

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001391

SITE DETAILS

Site: **Pernod Ricard India - Nashik**

Address: 126, Kadwa Malungi, Post. Valkhed, Dindori, 422202, Nashik, Maharashtra, INDIA

Contact Person: Anjali Mahajan

AWS Reference Number: AWS-000509

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Gold

Date of certification decision: 2025-Apr-14

Validity of certificate: 2028-Apr-13

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2024-Dec-02

Audit End Date: 2024-Dec-05

Lead Auditor: Sunil Kumar

Site Participants:

Anjali Mahajan, Manager - S&R

Kapil Gill, Senior Manager - Engineering

Roopam Bhattacharya, Assistant Manager - E&S

Jitendra Kumar, Assistant Manager

Monica Jain, Senior Manager - CSR

Garima, Assistant Manager - CSR

Sharad Nagare, Manager- External Affairs

Milind Datar, Head - EHSS

Sawinder Singh, Unit Head - Nashik

Vaibhav Deshmukh, Manager - EHSS

Kamalesh Dwivedi, Distillery Manager

Kavita Bharambe, Senior Manager - Production

Sandeep M Phuke, Senior Manager - HR

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 4 major non-conformities, 23 minor non-conformities, and 12 observations were raised. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to all the 5 AWS outcomes.

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 01 March 2025.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 16 April 2025.

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

The audit team recommends certification of Nashik Site at Gold level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

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Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nashik site of Pernod Ricard India against the AWS International Water Stewardship Standard Version 2.

Pernod Ricard India Private Limited (PRI) is a fully owned subsidiary of Pernod Ricard South Asia and a fast-growing multinational alcohol-beverage company delivering quality products to its consumers across the country. Home to renowned brands in each category, Pernod Ricard India holds one of the most dynamic and premium portfolios in the industry. Today, Pernod Ricard is present in over 160 countries and its global reach is testimony to 50 years of growth, and its transformation into a responsible and sustainable company for the future.

Nashik site of Pernod Ricard is located in a village Kadwa-Mhalungi, Block/ Taluka- Dindori, District- Nashik, Maharashtra, India. The Site is connected with city of Nashik by a village road connecting State-highway 18. Nearest railway station to the Site is Nashik Road Railway station located ~32 km south (by road), and nearest airport (Nashik Airport) for Site is located at ~19km south east (by road).

The facility operates a grain-based distillery with a production capacity of 60 KLD (Kilo Liters per Day), producing ethanol at 96% purity. Site is producing the ethanol with yield of 480 BL GNS / MT grain (GNS – Grain Neutral sprit) within the permitted capacity of 21900 KL/A. Packaging and Blending includes 8 packaging lines, having a 400+ SKU (Market and Brand combination) with a total filling capacity of 50,000 cases per day which is equivalent to 450 KLD, ensuring efficient and large-scale product packaging. The plant also includes a blending with storage capacity of 650 Final product, which prepares the final product by diluting ethanol with water. The blending capacity aligns with the packaging output, producing up to 450 KLD of finished product.

The audit was conducted onsite on 02 - 05 December 2024.

The onsite visit included the assessment of manufacturing facility ncluding water treatment plant, water storages, effluent treatment plants, sewage treatment plants, rain water harvesting and treatment system that were visited as part of the audit.

SCORE

50.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	12
Minor	23
Major	4

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FINDING DETAILS

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Finding No:	TNR-015047
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2025-May-01
Checklist item:	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.
Findings:	The site identifies 2 km radial area around the plant as core area and 5km radial area as buffer zone as the catchment area from the plant, however that does not meet the definition of a catchment in AWS standard or a generally accepted terminology. Besides, the area does not include the source of water for the site (Karanjwan dam) or its drainage basin. As catchment is a cornerstone of water stewardship, the identification of it needs to be addressed prior to certification. Additionally, the following deficiencies are noticed with respect to the pipeline networks; 1. The raw water pipelines and sewer network layouts are in draft form, a proper CAD drawings are not available. 2. The sewer network for the winery and Neev plots are not available. 3. Raw water pipeline (10 km from the source) layout is not available.
Corrective action:	We have included the source water catchment. Further, considering the fact that Site activities are likely to impact area in the vicinity of the Site, a buffer area of 5 km around the Site was considered for further engagement. Karanjwan Dam and its drainage basin, which are essential to understanding the broader environmental impact of our water usage. Catchment maps are included. Finalizing AutoCAD Drawings for Water Infrastructure: Our target is to ensure all water-related infrastructure is comprehensively mapped and available for audit purposes. Timeline: Draft AutoCAD drawings to be completed by 28th February EOD. Full finalized drawings will be available by the end of the first quarter. Owner: Site Engineering Team, External Consultants. A Study for the storm water pipeline and drain line was also on going at site by external consultant. Consultant has visited the site and MOM is shared by them.

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Evidence of implementation: We have included the source water catchment. Further, considering the fact that Site activities are likely to impact area in the vicinity of the Site, a buffer area of 5 km around the Site was considered for further engagement. Karanjwan Dam and its drainage basin, which are essential to understanding the broader environmental impact of our water usage. Catchment maps are included.

Finalizing AutoCAD Drawings for Water Infrastructure:
Our target is to ensure all water-related infrastructure is comprehensively mapped and available for audit purposes.

Action: We are already in the process of finalizing the AutoCAD drawings for raw water pipelines, sewer systems, and stormwater management. The draft layouts will be updated to full engineering plans, ensuring that all water systems, including those for the winery and Neev plots, are documented accurately.

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Finding No:	TNR-015059
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The communities located within a 5 km radius from the site are considered as key external stakeholders. However, the identification does not include indigeneous people in the region. In addition, the water source namely Karamjar reservoir is around 10 km away from the plant: the physical scope of the site for stakeholder identification does not include this area.

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Corrective action:

To enhance the stakeholder identification process, ensuring all relevant groups, those connected to the ultimate water source (Karanjaun reservoir), are included and consulted regarding water-related challenges.

Objectives:

1. Broaden the scope of stakeholder identification to encompass all relevant groups, including Indigenous peoples, women, minorities, and those affected by the ultimate water source.
2. Develop an inclusive consultation process that actively engages stakeholders in identifying and addressing water-related challenges from upstream.

Actions:

1. **Revise Stakeholder List:**
Expand the stakeholder identification process to include Indigenous groups, vulnerable communities, and those living within a 20 km radius of plant covering the villages directly affected by Karanjaun reservoir, the main water source.
2. **Stakeholder Consultation:**
Organize targeted consultation sessions with inclusive approach with relevant communities to understand their water-related challenges and interests.

Timeline:

Year 1 – Revise stakeholder list by Q1FY26

Year 2 – Strengthening the stakeholder engagement process

Responsibility :

CSR Team for CSR programmatic details

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Finding No:	TNR-015060
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Site's stakeholder identification process does not consider the stakeholders who can be impacted due to site's water withdrawal, the ultimate source of water is Karanjwan dam, which is around 10 km from the plant. Only regulatory body such as Water Resources Department who has control on reservoir for water allocation has been considered as stakeholder. Communities in the upstream or in and around of this dam have not been identified.
Corrective action:	To revise the stakeholder identification process to include upstream communities and better assess the potential degree of influence between the site and stakeholders within the catchment area, particularly regarding the Karanjwan Dam. Objective: 1. Identify and engage with upstream and surrounding communities near the Karanjwan Dam to assess their influence on, and the impact of, the site's water withdrawal. 2. Incorporate stakeholders in the broader catchment area into the site's water management and decision-making processes. Understand and mitigate the potential effects of water withdrawal on upstream and downstream stakeholders. Action: 1. Broaden Stakeholder Identification: Expand the scope of stakeholder identification to include upstream communities and those around the Karanjwan Dam, which is the site's ultimate water source. Identify key stakeholders in the catchment area, particularly those affected by or influencing water quality and availability. 2. Assess Potential Influence: Conduct an assessment of the degree of influence these upstream stakeholders may have on the site's water usage and vice versa. Identify any potential risks or concerns these communities may have regarding water management, availability, or quality. 3. Engagement Strategy: Develop a tailored stakeholder engagement plan that includes upstream communities in consultation and decision-making regarding water usage, availability, and quality. Responsibility : CSR Team for CSR programmatic details

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Finding No:	TNR-015105
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Nashik region is identified as zone III as per seismic zoning classification as per Bureau of Indian Standards. Vulnerability assessment based on seismic zoning classification of the region including the specific mitigation measures for pipeline rupture, ETP collapse are not worked out, for example alternate source identification, automatic monitoring system for raw water pipeline etc.
Corrective action:	The description of IoT in the ERP has been removed, and we have initiated predictive maintenance using NDT for the dam site water pipelines with defining frequency of half yearly, and the relevant reports were presented during the audit, with the same attached for reference. for further strengthening the process we are exploring new technique available for such predictive maintenance, and In parallel planning from geo seismic study from expert party.
Finding No:	TNR-015106
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	Site's water balance mapping is not complete in respect of discharges in winery plant, NEEV, boiler blow down and, hydrant losses. The identification and quantification of stormwater in the entire site, rainwater harvested and recycled through harvesting system in NEEV and mainplant are neither identified nor mapped.
Corrective action:	Installation of hour meter is done at fire pump house. Photos are attached for reference during the water balance calculation same will be calculated on the basis of rated pump discharge and run hour of meter. Total water used for charging of fire hydrant lines will be calculated and added in unaccounted water loss. There is no discharge from Nashik neev due to shutdown of plant for sanitization purpose WASH facilities at Distillation, Admin and Bottling unit are used which treats into our 80 KLPD STP plant.

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Finding No:	TNR-015107
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Quantification of water use and discharge is not done in the water balance chart in respect of the following: 1. Losses such as hydrant losses, 2. sewage discharge in winery plant and NEEV. 3. Storm water discharges in winery plant and NEEV. In addition, the basis for use of harvested rainwater is not presented. The water balance presented were of 2023, which are not updated with the present configuration of the plant processes, for example winery plant is not currently in operation. colling tower blowdown and boiler blowdown are not quantified. In the distillation section domestic use is identified as 5256 KL whereas the STP inlet from these domestic use areas as 20845.14 KL. The attachment is not meeting the requirement for quantification of water balance.
Corrective action:	1. The necessary inputs for installing an hour meter to track the operation of the fire hydrant pump were already available; however, the installation was pending at the time of the audit but got completed currently in the month of Feb. The same will be calculated for water used in fire hydrant from the month of feb. by multiplication of run hour of main and jockey pump with rated pump discharge . Water flow meter in fire hydrant cannot be installed as it will affect overall fire hydrant water pressure balancing. 2. We have provided flowmeters in both areas where water is used for drinking and hygiene purpose , Now we will be providing additional flowmeter on drinking side and calculate the water for sewage by subtract drinking water with main water supply. 3. As per the consent to operate there is no requirement for storm water system for Nashik Winery . Attached is the consent copy for Winery plant for reference. in rainy season storm water get consumed in vicinity of Winery premises. 4. In Nashik Neev we have 2 rain water harvesting pond whose total volume (capacity) is 15976 cum. meter. (KL). In rainy season storm water gets accumulated here in the pond, while the rest of excess storm water is getting percolated. Other than these the water we are using from the site to the Nashik Neev we will install flow meter for monitoring and accounting. 4. We will provide the revised latest water balance report for Q1 2025, as per the observation.

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Finding No: TNR-015187
Checklist Item No: 1.3.5
Status: Open
Finding level: Observation
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: Identification of the chemical storages is done in hand written in a drawing, consideration may be given to prepare a proper as built drawing. Containment arrangement of chemical storages are noted during site visit in most of the locations. It was found not adequate / not available in chemical storages adjacent to Hcl tank or STP.
Corrective action: Chemical hazardous storage room ready with chemical flooring . Impingement certificate is received from authorized vendor also training on spillage management is done with the cross functional team holder. Secondary containment was stacked properly addition spill kit also kept at chemical storage room near HCL tank. Attached of training record and videos is submitted for reference. Proposal for engineering layout for chemical storage room across the plant is shared with consultant for Auto CADD drawing and will be available by 1st April.

Also the measurement of Bund wall around HCL tank is done and completed to check whether the criteria for secondary containment capacity (i.e. 110% of total tank volume) is meeting or not. Which is found satisfactory

Finding No: TNR-015188
Checklist Item No: 1.3.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-06
Checklist item: On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings: Site has identified a canal which pass through the factory as the IWRA within the site. This canal carries water only when irrigation department releases the water. The site carries out regular inspection and cleaning as per defined frequency based on the records shown. However, during the site round, it was noted that the canal carries water which seems to be having waste dumped/oil patches. The cleaning and maintenance processes are not effective in maintaining the IWRA in good condition. However, the IWRA is identified as in good condition.
Corrective action: The area was immediately cleaned, and as part of the regular maintenance schedule, canal cleaning is conducted quarterly. Attached are the checklist, purchase order (PO), photos, and videos, including footage of water passing through the canal both within and outside the premises.

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Finding No:	TNR-015189
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The site has identified the rainwater harvesting structure as an IWRA. The stormwater harvesting structure is not considered an IWRA, but only a water infrastructure for the plant.

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Finding No:	TNR-015190
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Site water related cost compilation only covers the water purchase cost, treatment cost and effluent treatment cost. This does not include all water-related costs associated with water stewardship activities such as costs associated with water efficiency improvement programmes, IWRA maintenance, RWH maintenance, catchment area water harvesting structures development and maintenance, regulatory fees, consultancy fees, audit or inspection fee. Also description or quantification of the social, cultural, environmental, or economic water-related value generated by the site has not been provided.
Corrective action:	To capture annual water related costs of CSR programs on all the initiatives including audits and other assessments on the site and catchment. Objectives: 1. To prepare comprehensive statement of annual water related cost - including all water-related costs of catchment initiatives of CSR 2. Above statement should also capture the assessment & audit cost for implementing all such initiatives such as audit fees and assessment cost 3. Develop a framework to measure and map the multi-dimensional value generated from water interventions, covering social, cultural, economic, and environmental impacts for catchment Actions: 1. Year 1 – Comprehensive statement for annual cost of catchment initiatives under CSR. Measurements basis initiative through audits, assessment or reporting of CSR programs 2. Yearly audits for the initiatives of catchment & assessment as per the mandate of the CSR law. Timeline: Year 1 – Coming up with comprehensive statement & measurement process Year 2 – Continuing the same in upcoming years Responsibility : CSR & Site

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Finding No:	TNR-015191
Checklist Item No:	1.3.8
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	The plant has carried out an assessment of the adequacy and accessibility of toilets and latrines in accordance with Maharashtra factory standards. According to the assessment, 16 latrines/WCs should be provided for the female employees in the bottling section, while only 12 have been provided.
Corrective action:	As mentioned below after inclusion of WC for female in bottling the washroom count will be 16 which is complying the requirement as per the factory act. Drawing for the construction WC is attached for reference also re-attaching the revised Washroom details. For rest area all the W/C facilities for male and female are meeting the requirement.

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Finding No:	TNR-015192
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	While site has made efforts to identify the key suppliers and obtain the water use data, there is no data picked up on evidence of quality of water used by them and the potential water risks posed by these identified suppliers.

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Corrective action:

To ensure that our supplier water management practices are comprehensive and aligned with our water-positive goals, the following corrective actions will be implemented:

Year 1

1. Broader Supplier Engagement and Data Collection:

- Objective: Expand engagement with all critical suppliers and collect more detailed data on their water management practices, including water quality and regional water stress.
- Action: In addition to the current email engagements, we will enhance our supplier outreach by scheduling meetings to collect more detailed data and discuss water-related challenges.
- Timeline: Ongoing, with the first round of enhanced data collection to be completed within the next quarter.
- Owner: S&R Team, Procurement Team

2. Improved Template Incorporating Water Use and Quality:

- Objective: Revise and expand the template for water data collection to include water quality metrics and detailed catchment risk analysis.
- Action: Update the existing template to capture critical information such as water quality, sustainability measures, and the broader water risk within the suppliers' catchment areas. The revised template will also include questions about water-saving initiatives and any potential issues related to water sources.
- Timeline: Template update to be finalized by April.
- Owner: S&R Team, Procurement Team.

3. Supplier Catchment Risk Mapping:

- Objective: Map all critical suppliers according to the risks they pose within their catchment areas
- Action: Collaborate with the procurement team to develop a risk matrix that will map suppliers based on their water use, the quality of their water, and potential risks in their catchments. This matrix will help prioritize suppliers for closer monitoring and risk mitigation efforts.
- Timeline: Complete the catchment risk mapping exercise within 6 months.
- Owner: S&R Team, Procurement Team

Year 2

1. Identification of Water Optimization Initiatives with Suppliers:

- Objective: Work with suppliers to introduce water optimization initiatives that reduce both water consumption and associated risks.
- Action: Develop a program that encourages suppliers to adopt water-saving practices, such as optimizing irrigation, improving water recycling, and investing in efficient water management technologies. We will offer training, resources, and support to help them implement these changes.
- Timeline: Roll out the first phase of water optimization initiatives within the next quarter.
- Owner: S&R Team, Sustainability Team.

2. Water-Related Risk Review with Suppliers:

- Objective: Perform a detailed water-related risk review with all key suppliers to ensure their water usage practices are sustainable and aligned with our water-positive goals.
- Action: Extend our risk review process to include supplier water management practices, focusing not only on water withdrawal but also on the sustainability of their water sources, water quality, and the risks

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- posed by their operations in their respective regions.
- Timeline: Begin supplier risk reviews
 - Owner: S&R Team, Procurement Team.
3. Continuous Monitoring and Performance Evaluation:
- ☐ Objective: Ensure the effectiveness of the corrective actions by establishing ongoing monitoring and performance evaluation mechanisms.
 - ☐ Action: Develop key performance indicators (KPIs) for supplier water management, which will be regularly tracked to assess progress. Conduct quarterly reviews of supplier water data, optimizing engagement strategies as needed.
 - ☐ Timeline: Ongoing, with the first KPI review to be conducted at the end of the first quarter.
 - ☐ Owner: S&R Team, Procurement Team

Finding No:	TNR-015193
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	Although the document provided show the outsourced services to be considered in general, relevant outsourced services for the site, such as washing and cleaning of vehicles, construction activities, finished good transportation, etc. are not identified, whether these are in the same catchment area have also not been identified by the site.
Corrective action:	Flow meter is already installed to record and monitor the water usage in project for civil and construction purpose is already available. Photos of the flowmeter and logbook are attached for refrence purpose however we do not provide water cleaning of vehicle (loadaing and unloading trucks coming inside/outside the plant premises through our catchment area.

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Finding No:	TNR-015330
Checklist Item No:	1.5.2
Status:	Closed
Finding level:	Major
Due date:	2025-May-01
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	While compliance is observed for water consent conditions, Nashik Environment register does not include water related legal and regulatory requirements. specific to Factories Act, Water (Prevention and Control of Pollution) Act and the Water Resources department requirements for water allocation.
Corrective action:	"1. Process for up-dation of legal register considering all water related legal and regulatory requirements is done and quality analysis as per IS guideline. 2. At Organization level there is one more robust system has been introduced at site having all statutory and legal requirements built in that been reviewed at VP level on monthly basis, the system (I-comply) is exhaustive and include all water related compliance pertaining to factory act, irrigation department, local compliance, pollution control boards etc. 3. We have defined RACI for the same to monitor. Testing will be done half yearly pre & post monsoon in which covers various other parameters to ensure the safety and quality of drinking water. Some of these parameters include pH, turbidity, total dissolved solids (TDS), chemical contaminants (such as heavy metals, pesticides, and organic compounds), and odor and taste. 4. We have I-compliance tool for all the legal compliance monitoring and up-dation of the records which send prior notification to close the compliance observation. 5. Attachment of revised master legal register is done for reference."

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Finding No:	TNR-015197
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Information collected has gaps: physical and biological status/parameters are not covered; in addition, seasonal variations are not identified through a trend analysis.
Corrective action:	Started analysis of physical, chemical, and biological parameters through external lab on monthly basis. Test are done on 64 parameters as per IS 10500 . Report is attached for the reference. This help is evaluating the external water quality also. Water analysis report for both outside Well for Odor, PH, TDS,TSS,BOD,COD, Chloride, Sulphate and Oil and grease are being attached from Jul 2023 till date for reference.
Finding No:	TNR-015199
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The existing and planned infrastructure for the region by the government has been identified by the site such as dams, upper godavari project and water diversion schemes. However, the same does not include the condition of these infrastructures and potential exposure to extreme events , especially from climate change impacts.
Corrective action:	Site has identified planned and existing water related infrastructure. We will consult governing agencies to identify potential exposure to extreme events. Also CSR Water stewardship plan of the catchment will factor in Climate resilient infrastructure which can withstand calamities like extreme rainfall, earthquake, etc

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Finding No:	TNR-015202
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	Site has documented the shared water challenges as poor water quality, lack of solid waste management, deteriorating water structure and lack of local water resources. However, from the information gathered through stakeholder engagements and other sources (such as public information), how these are prioritised as the shared water challenges as well as for action is not evident.
Corrective action:	To conduct prioritization for the shared water challenges of the catchment and mapping of initiatives and actions (under CSR) accordingly. Objectives: 1. To establish clear strategy for prioritization of shared water challenges 2. To map actions/ initiatives according to the program timelines & prioritization matrix. Actions: 1. Document the Prioritization Process: Clearly define the criteria and methodology used to prioritize the shared water challenges based on stakeholder consultations, surveys, baseline reports, and other data sources. 2. Alignment of the programs with prioritization matrix & program timelines Timeline: Year 1 – Prioritization of shared water challenges & alignment of programs accordingly – Q2FY26 Year 2 – Implementation of the initiatives accordingly going forward Responsibility : CSR Team
Finding No:	TNR-015260
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The site identified only the site's own initiatives. It should also look whether there are also any other initiatives (initiated by others) that also aim to address shared water challenges – this could point to possible areas for collaboration or collective action.

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Finding No:	TNR-015275
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The opportunities within the catchment level are not identified for its assessment and prioritisation of potential savings and business opportunities. Consideration may be given for assessing the potential savings and business opportunities for the CSR initiatives.
Finding No:	TNR-015290
Checklist Item No:	2.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Findings:	An organogram on legal compliance is presented, however it is not clear which person/ position is responsible for legal compliance for water and wastewater management. Only for environmental statement to MPCB, there is a flow chart indicating the person responsible for reporting to Pollution Control Board. Prime Environment and Sustainability Playbook details about environmental compliance requirement and environment and sustainability committee. However, at the site level there is only a draft document on committee available which does not clearly define responsibility for ensuring legal compliance.
Corrective action:	Contact details of FPR is updated in organogram with mobile number mail id and name mentioned as same is displayed on the factory gate. This is specific to water related grievance further to add more master legal register is also attached where the name of the responsible person are mentioned and display at the site. Also monitoring and executing the legal requirements we have integrated I compliance tool which is used for completing and closing of all legal and statutory requirements of the site.

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Audit Number: AO-001391

Finding No:	TNR-015291
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-May-01
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Site has presented site level water road map and the performance and also the water stewardship achievements for the catchment 2023-24. Site has achieved the water positive status in line with the organisation goal. However, a comprehensive water stewardship plan aligning with the shared water challenges in the region with planned action, timeframe, financial budgets, measurement & monitoring and responsibilities could not be shown.
Corrective action:	To develop a comprehensive water stewardship plan that extends beyond the plant's boundaries, addressing shared water challenges, and aligning with AWS outcomes, integrating water conservation strategies for a more structured, long-term approach to water sustainability. Actions and Timeframes: 1. Develop a Comprehensive Water Stewardship Plan - o Action: Design a strategic, long-term water stewardship plan that includes detailed financial allocations, measurable targets, clear timelines, and responsibilities. - o Timeline: Finalize the plan by the end of Year 1, with the first phase of implementation rolling out by April 2025. Owner: Sustainability Team, CSR Team, Site Team
Evidence of implementation:	1. Develop a Comprehensive Water Stewardship Plan - o Action: Design a strategic, long-term water stewardship plan that includes detailed financial allocations, measurable targets, clear timelines, and responsibilities. - o Timeline: Finalize the plan by the end of Year 1, with the first phase of implementation rolling out by April 2025. Owner: Sustainability Team, CSR Team, Site Team

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Finding No: TNR-015292
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-06
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings: The water risk at Nashik level document provides potential costs and business impact for 2040 scenario. However, there is no documented plan for mitigating or adapting risks in coordination with public sector or infrastructure agencies or evidence of the efforts to start developing it. Although site mentioned that they are in discussion with Water Resources Department for desliting activities, there is no documentation available in this respect.
Corrective action: We will discuss with the agencies or authorities in the catchment which will help increasing engagement. We will provide a detailed explanation of its discussion with various public sector agencies and its submission

Finding No: TNR-015327
Checklist Item No: 3.2.1
Status: Closed
Finding level: Major
Due date: 2025-May-01
Checklist item: A process to verify full legal and regulatory compliance shall be implemented.
Findings: Process for verification of legal and regulatory compliance is not effectively implemented. As per Agreement with Water Resources Department no. AZ211487 dated 25.03.2021 water allocation of 0.655 million KL is for portable water supply to residential colonies & agricultural purpose. However, this is used for industrial purpose also. Similarly as per the factories rules the total number of Latrines/WC for females in bottling section should be 16 as per their assessment., whereas only 12 are provided. No evidence of corrective action initiated to close this. These show that system for legal compliance monitoring has not been effectively implemented.
Corrective action: Further in continuation attaching the acknowledgement copy (supplementary agreement) of the irrigation department compliance report in which its clearly mentioned the water consuming is for industrial purpose. Also attaching the copy of water bill Oct & Nov 24 where its clearly mentioned the water uptake for the industrial purpose.

As mentioned below after inclusion of WC for female in bottling the washroom count will be 16 which is complying the requirement as per the factory act. Drawing for the construction WC is attached for reference also re attaching the revised Washroom details. For rest area all the W/C facilities for male and female are meeting the requirement.

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Finding No:	TNR-015305
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	(a) Site has not set water quality targets beyond legal compliance in the water stewardship plan. (b) Data on effluent quality till 2023 were presented, which were meeting the standards. However, since there is no data on the latest treated effluent quality (for year 2024), the compliance could not be verified.
Corrective action:	The source water is used only after proper treatment. There are targets/standards set by PRIPL is core requirements for water quality. Plant has a pre-treatment system in place to achieve the water quality standards. The site is monitoring water quality through regular testing by internal and external laboratories. Site also has a target for waste water treatment inlined to MPCB Consent requirement and testing is carried out via internal and external laboratory. Test results are monitored. Attaching the external lab report for last quarter in excel format. PRIPL has already developed in-house pre-treatment facilities for groundwater to meet the process and WASH water quality requirements, these comprises filtration, ultra-filtration, DM and finally passing through UV. Also at most importance is given to water quality in-house water treatment process monitoring and water quality is verified on daily basis. PRIPL has its own core requirements to assured water quality. PRIPL has developed robust pre-treatment standard operating procedures and the operators are well-trained. PRIPL has adopted Monthly testing of treated raw water for Coliform count as per the Good Management Practices (GMP). The quality of the surface water is within the prescribed norms for all Physico-chemical parameters. Total Coliform is detected in the raw water, Facility has been monitoring the surface water quality at the site twice in a year and the TDS levels during the pre-monsoon and post-monsoon seasons are recorded. The facility also monitors the water quality in the surface twice in a year through NABL, MoEF&CC & CPCB approved laboratory. PRIPL has identified the water quality targets such as COD, BOD, TDS, pH for the treated wastewater and For raw water quality targets such as pH, TDS, Chlorides and Total Coliform in the updated water stewardship plan. Treated Wastewater Quality: Treated wastewater quality is daily monitored in the in-house laboratory for quality checks. Also one sample in a month is tested through an NABL, MoEF&CC and CPCB approved laborato

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Finding No: TNR-015345
Checklist Item No: 3.4.2
Status: Open
Finding level: Observation
Checklist item: 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.
Findings: Site meets the effluent quality norms as per the consent. Site has plan to upgrade ETP to meet the additional effluent load from malt. Although there is a plan of ETP improvement, consideration may be given to set a continual improvement target beyond legal compliance by the site.

Finding No: TNR-015307
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-06
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: Site has demonstrated plans and programmes for cleaning the canal running through the plant. Feedback on the status of the canal subsequent to each time's cleaning has also been obtained from Panchayat. Procedure for regular cleaning and record & photos of the same were also available. However, on the day of the audit during the site round, the condition of the canal was not good and does not give an impression that it is maintained in good condition at all times. The solid waste was noticed in side the canal.
Corrective action: The area was immediately cleaned, and as per the maintenance schedule, canal cleaning is carried out quarterly. Attached are the checklist, purchase order, photos, and videos documenting the cleaning process, along with footage showing water passing through the canal both within and outside the premises.

Finding No: TNR-015309
Checklist Item No: 3.6.1
Status: Open
Finding level: Observation
Checklist item: 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.
Findings: System for regular inspection of onsite facilities is established by the site. However, during the site tour it was noted that the toilet for workers in distillation plant is not maintained in good condition both from adequacy of facilities and hygiene. But, the records of inspection for the same day shows all are in good condition.

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Finding No:	TNR-016143
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	There was no indirect water use set in the water stewardship plan, as it was stated that there are no major suppliers from the same catchment. However, this may not be true as the catchment identification does not meet the requirements. This indicator will need to be re-visited when the catchment identification is addressed.

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Audit Number: AO-001391

Finding No:	TNR-015311
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Site has conducted supply chain assessment through an external agency (copy of report attached). The report identifies the water use by various identified suppliers. However, this does not include the service providers. In addition, it is also not evident what actions are being initiated as a result of site's engagement in managing the water risks in the supply chain.

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Corrective action:

we will include broad supplier list inclusive of service providers . To ensure that our supplier water management practices are comprehensive and aligned with our water-positive goals, the following corrective actions will be implemented:

Year 1

1. Broader Supplier Engagement and Data Collection:

- Objective: Expand engagement with all critical suppliers and collect more detailed data on their water management practices, including water quality and regional water stress.
- Action: In addition to the current email engagements, we will enhance our supplier outreach by scheduling meetings to collect more detailed data and discuss water-related challenges.
- Timeline: Ongoing, with the first round of enhanced data collection to be completed within the next quarter.
- Owner: S&R Team, Procurement Team

2. Improved Template Incorporating Water Use and Quality:

- Objective: Revise and expand the template for water data collection to include water quality metrics and detailed catchment risk analysis.
- Action: Update the existing template to capture critical information such as water quality, sustainability measures, and the broader water risk within the suppliers' catchment areas. The revised template will also include questions about water-saving initiatives and any potential issues related to water sources.
- Timeline: Template update to be finalized by April.
- Owner: S&R Team, Procurement Team.

3. Supplier Catchment Risk Mapping:

- Objective: Map all critical suppliers according to the risks they pose within their catchment areas
- Action: Collaborate with the procurement team to develop a risk matrix that will map suppliers based on their water use, the quality of their water, and potential risks in their catchments. This matrix will help prioritize suppliers for closer monitoring and risk mitigation efforts.
- Timeline: Complete the catchment risk mapping exercise within 6 months.
- Owner: S&R Team, Procurement Team

Year 2

1. Identification of Water Optimization Initiatives with Suppliers:

- Objective: Work with suppliers to introduce water optimization initiatives that reduce both water consumption and associated risks.
- Action: Develop a program that encourages suppliers to adopt water-saving practices, such as optimizing irrigation, improving water recycling, and investing in efficient water management technologies. We will offer training, resources, and support to help them implement these changes.
- Timeline: Roll out the first phase of water optimization initiatives within the next quarter.
- Owner: S&R Team, Sustainability Team.

2. Water-Related Risk Review with Suppliers:

- Objective: Perform a detailed water-related risk review with all key suppliers to ensure their water usage practices are sustainable and aligned with our water-positive goals.
- Action: Extend our risk review process to include supplier water management practices, focusing not only on water withdrawal but also

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on the sustainability of their water sources, water quality, and the risks posed by their operations in their respective regions.

- Timeline: Begin supplier risk reviews
- Owner: S&R Team, Procurement Team.

3. Continuous Monitoring and Performance Evaluation:

- ☐ Objective: Ensure the effectiveness of the corrective actions by establishing ongoing monitoring and performance evaluation mechanisms.
- ☐ Action: Develop key performance indicators (KPIs) for supplier water management, which will be regularly tracked to assess progress. Conduct quarterly reviews of supplier water data, optimizing engagement strategies as needed.
- ☐ Timeline: Ongoing, with the first KPI review to be conducted at the end of the first quarter.
- ☐ Owner: S&R Team, Procurement Team

Finding No: TNR-015315

Checklist Item No: 4.1.1

Status: Open

Finding level: Observation

Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.

Findings: Site has clear road map for reduction of water use efficiency for the plant which is progressing as per plan. For catchment level, the goal is to achieve water positive for Nashik region by 2030, which has already been achieved. However, the site has not prepared a report on comprehensive target versus achievement for targets to meet shared water challenges. For example, water quality issues, solid waste management, WASH infrastructure improvement etc.

Finding No: TNR-015317

Checklist Item No: 4.1.2

Status: Open

Finding level: Observation

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

Findings: Not all water management interventions of the CSR programmes have been evaluated in a similar way to the cost-benefit analysis for the water conservation project in the plant operations.

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Finding No:	TNR-015103
Checklist Item No:	4.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	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.
Findings:	While reviewing the ERPs for water, it was found that implementation of preventive measures as identified in ERPs are not implemented, nor these are reviewed for its adequacy. For example, ERP for water identifies measures such as alternate source identification (borewell, water tankers), vulnerability mapping, automatic monitoring through SCADA or IOT, which are not established. Spill control measures identifies about the containment provision, however, some areas are noticed with inadequate or absence of containment areas. Foe example STP and chemical storage adjacent to HCl tank
Corrective action:	1. ERP is updated, In case of water shortage or water unavailability in Dam. Buffer storage for 2 days of plant operation is kept. 2. Action plan for taking water tank after quality check for operation and drinking purpose is also included in ERP. 3. After discussion irrigation authorized person its confirmed there end that Karanjwan dam from where we are lifting water for drinking and operation no use, no other industries are up-taking or using the same water source. Apart from our organization the other purpose for which dam water is used is for irrigation and drinking in local villages

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Finding No:	TNR-015321
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
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:	Site has provided compiled sheet of learnings and challenges from WASH projects such as response time, mobilisation delays and land acquisition etc. (document attached). However, how these learnings are considered for modification of water stewardship plan is not evident.
Corrective action:	To ensure that learnings from previous projects, including challenges faced, are systematically used to modify and adapt the water stewardship plan, ensuring continuous improvement. Objectives: 1. Demonstrate how lessons learned from WASH projects and other initiatives are used to refine and improve the water stewardship plan. 2. Create a clear process of review for incorporating relevant insights into the planning and execution of water stewardship activities. 3. Provide documentation of integration of these learning in the water stewardship plan. Actions: 1. Establish a system to document learnings with relevant stakeholders (Communities, Govt., implementation partners) as per set frequency. 2. Review the learnings and implement course corrections with proper documentation. 3. Incorporation of learnings in the larger water stewardship plan. Timeline: Year 1 – • System establishment at all levels – July'25 • Review of learnings on a quarterly basis of every catchment program and incorporate changes accordingly Year 2 – Strengthening of the process accordingly going forward Responsibility : CSR Team

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Finding No:	TNR-015346
Checklist Item No:	5.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	A flow chart for compliance with local laws and regulations related to water and the escalation matrix is displayed on the front door. It is not clearly indicated which position is responsible for compliance.
Corrective action:	To ensure that learnings from previous projects, including challenges faced, are systematically used to modify and adapt the water stewardship plan, ensuring continuous improvement. Objectives: 1. Demonstrate how lessons learned from WASH projects and other initiatives are used to refine and improve the water stewardship plan. 2. Create a clear process of review for incorporating relevant insights into the planning and execution of water stewardship activities. 3. Provide documentation of integration of these learning in the water stewardship plan. Actions: 1. Establish a system to document learnings with relevant stakeholders (Communities, Govt., implementation partners) as per set frequency. 2. Review the learnings and implement course corrections with proper documentation. 3. Incorporation of learnings in the larger water stewardship plan. Timeline: Year 1 – • System establishment at all levels – July'25 • Review of learnings on a quarterly basis of every catchment program and incorporate changes accordingly Year 2 – Strengthening of the process accordingly going forward Responsibility : CSR Team

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Finding No:	TNR-015323
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Water stewardship report of 2023-24 is a performance report of water positive status of the company for each site. The same does not include the water stewardship plan for the site based on catchment level shared water challenges. How these are communicated to relevant stakeholders is also not described.
Corrective action:	To inculcate catchment water stewardship plan through various communication channels to relevant stakeholders, highlighting how it contributes to AWS Standard outcomes and addressing shared water challenges under CSR programs. Objectives: 1. Develop a comprehensive water stewardship plan at the catchment level, addressing the shared water challenges in the catchment area under CSR programs. 2. Establish dissemination channels to communicate to relevant stakeholders on how these plans are getting achieved and contributes to AWS Standard outcomes. Actions: 1. Develop a Water Stewardship Plan for catchment 2. Establish Stakeholder Communication Process 3. Incorporate the water stewardship plan in the reporting 4. Strengthen stakeholder engagement for effective communication Timeline: Year 1 – • Comprehensive water stewardship plan for catchment – July'25 • Establishment of communication process with different stakeholders – Oct'25 Responsibility : CSR Team for CSR Programs

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Finding No:	TNR-015325
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Integrated report FY 2024 of the company generally describes about the water stewardship and the performance for the whole organisation (page no, 80). This does not provide Nashik site level performance. Similarly, CDP disclosures are also on global level, however, partly covers the Nashik site performance, but it is not of current performance, data is of 2021. Universal registration document also does not provide quantified performance data against target for the site.
Corrective action:	We will prepare a comprehensive water stewardship plan & By next servileince audit will be able to disclose the efforts made by the site to engage various stakeholders to address the shared water challenges and opportunities. Details of the same will be presented in next surveillance audit
Finding No:	TNR-016082
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-06
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The CSR 2023-24 report covers the company's interventions with respect to improving water availability through recharge, improved irrigation and rainwater harvesting practices and good water quality, sanitation and hygiene. Activities carried out internally and also programmes to improve water quality, wastewater quality, etc. have not been included. As well as disclosures of efforts made to comprehensively address all shared water challenges.
Corrective action:	This was the first phase for us. we will develop a comprehensive water stewardship plan. By next surveillance audit will be able to disclose the efforts made by the site to engage various stakeholders to address the shared water challenges and opportunities. Details of the same will be presented in next surveillance audit

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Finding No:	TNR-015349
Checklist Item No:	5.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	Site has not identified water related legal compliance violations and hence there was no disclosure made. However, there were legal non compliance identified in this audit, which require correction and disclosure to concerned stakeholders
Finding No:	TNR-015350
Checklist Item No:	5.5.2
Status:	Open
Finding level:	Observation
Checklist item:	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings:	Site has not identified water related legal compliance violations and hence there was no disclosure made. However, there were legal non compliance identified in this audit, which require root cause identification and implementation of corrective to prevent recurrence and disclosure to concerned stakeholders.

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Report Details

Report	Value
Report prepared by	Sunil Kumar
Report approved by	Gregorio Crespo
Report approved on (Date)	29 January 2025

Surveillance

Proposed date for next audit
2025-Dec-05

Comment This was the implementation audit. The next audit will be the first surveillance audit and should be planned accordingly.

Stakeholder Announcements

Date of publication	Location
28/10/2024	AWAS website
28/10/2024	AWS website
05/11/2024	Pernod Rircard website
Comment	Stakeholder announcements were done in three media as indicated below. For pernod ricard site , visit https://www.pernod-ricard.com/en/locations/india

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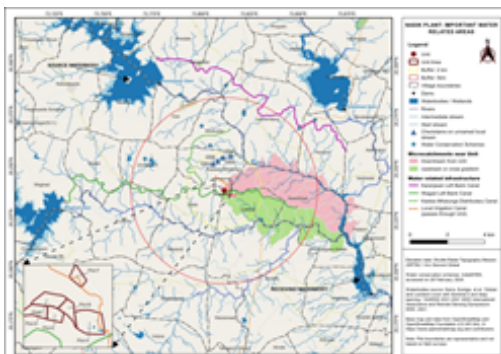
Catchment Information

Catchment Information

Site is located in a village Kadwa-Mhalungi, Block/ Taluka- Dindori, District- Nashik, Maharashtra, India. The Site is connected with city of Nashik by a village road connecting State-highway 18. Nearest railway station to the Site is Nashik Road Railway station located ~32 km south (by road), and nearest airport (Nashik Airport) for Site is located at ~19km south east (by road).

Hydrologically Site is located in Godavari basin. Site is dependent on freshwater withdrawn from the Karanjwan dam for its water requirements. The dam is located ~10.5 Km NE from site. The dam was constructed in 1974 which has a catchment area of 248 sq/ km. The dam has gross storage of around .175.56 -161.43MCM with dead storage of 9.43 MCM and live storage of 166.22 -152.09 MCM. The Kadwa river is the tributary of Godavari river. The river originates in the Western Ghats (Sahyadri) near village Desosane along the ridge in the northern part of the Karanjwan dam catchment. the elevations in the catchment vary between 645-927 m-amsl (above mean sea level). dominant geological formation in the area is deccan trap. Deccan trap is an igneous rock with low primary porosity resulting in low permeability. Groundwater is mainly limited to secondary porosities such as joints and fractures. Geomorphology further impacts the water regime (both the surface and groundwater) as it controls the infiltration and groundwater recharge. most of the catchment area is covered by croplands with limited coverage under range lands, and tress along the southern and northern boundaries of the catchment. Presence of relatively strong slopes along the ridges and absence of tree cover may lead to higher soil erosion in the catchment. Such soil erosion may lead to sedimentation of the Karanjwan dam resulting in reduced storage capacity. Moreover, the run-off from the croplands (agricultural area) may bring contaminants like nutrients from the fertilisers and other agrochemicals such as pesticides to the reservoir. Site is located on the ridge of the catchments of Kadwa river (on the north), and Kolwan river (on the south). Awankhed (located in Kawdwa river catchment) and Walkhed (located in Kolwan river catchment) are the villages located within the Site catchment.

Site considered that operations of the factory are likely to impact area in the vicinity of the Site, a buffer area of 5 km around the Site was considered for further engagement. As presented in Figure 25, elevation within the 5 km buffer area of the Site are observed to vary between ~708 m-amsl on the north eastern side (near Umrle Kh.) and south-eastern periphery to ~590 m-amsl along Kawda, and Kolwan rivers. Site is observed to be located at relatively higher elevation of ~650 m-amsl. Slope on other hand is observed to vary between nearly level to strong. Relatively steeper slopes (strong) are observed along the ridges and river banks.

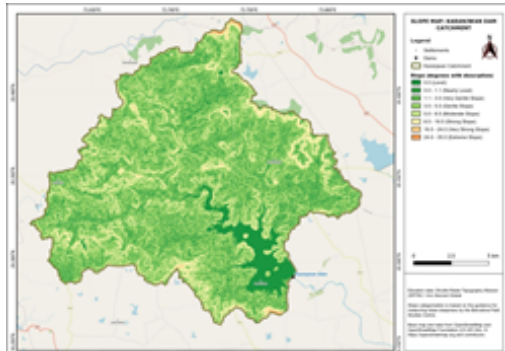


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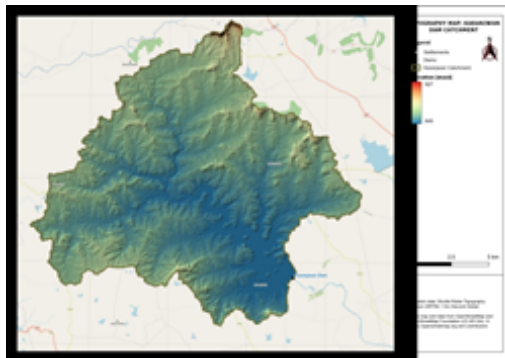
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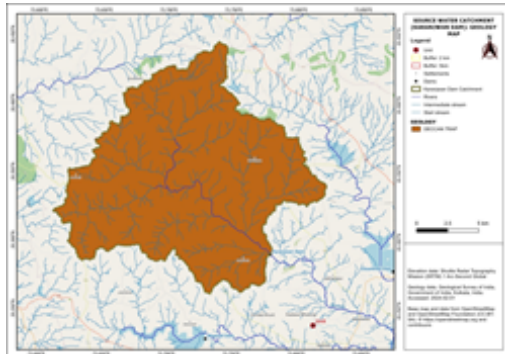
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PRI_Nashik_catchmentmaps-06.jpg



PRI_Nashik_catchmentmaps-05.jpg

Comment Catchment area defined by site only considers around 5km around the site, assuming that these are the impact zone from the operations perspective. The major impact of withdrawal of water is from dam, which has not been considered in the catchment area.

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Client Description and Site Details

Client/Site Background

Pernod Ricard India's Nashik facility, located at 126 Kadwa, Mhalungi, Taluka Dindori, Nashik, Maharashtra, 422007, houses a distillery, packaging, and blending unit. This state-of-the-art site supports the production of high-quality ethanol and finished products. Operating across three shifts, the facility employs approximately 2,500 personnel, including both on-roll and off-roll employees. The total area of the site is 1,31,100.00 sq.m. (Latitude - 20°14' 25.15" N Longitude - 73°48' 42.38" E).

The facility operates a grain-based distillery with a production capacity of 60 KLD (Kilo Liters per Day), producing ethanol at 96% purity. Site is producing the ethanol with yield of 480 BL GNS / MT grain (GNS – Grain Neutral spirit). Site is permitted to produce ethanol 21900 KL/A as per consent. Packaging and Blending includes 8 packaging lines, having a 400+ SKU (Market and Brand combination) with a total filling capacity of 50,000 cases per day which is equivalent to 450 KLD, ensuring efficient and large-scale product packaging. Site can produce finished good up to 162000 KL/A as per the consent. The plant also includes a blending with storage capacity of 650 Final product, which prepares the final product by diluting ethanol with water. The blending capacity aligns with the packaging output, producing up to 450 KLD of finished product.

Site is dependent upon freshwater drawn from the Karanjwan dam for its water requirement. The dam is located around 10.5 Km NE from site. The Site has established a jackwell upstream of the Karanjwan dam and water is withdrawn from the dam and is transferred to the Site through Mild Steel (MS) pipeline. Site has two water treatment plants for treatment of raw water received from Karanjwan reservoir. Site has also installed rainwater collection and treatment to facilitate reuse of harvested rainwater within the site. At present Site has two (2) effluent treatment plants, one each for bottling and distillery unit. ETP for bottling plant has a capacity of 270 KLD with an average operational loading of 150 KLD. Whereas, ETP at distillery unit has design capacity of 550 KLD with average loading of 150 KLD. Accordingly, both the ETPs have surplus treatment capacity relative to current loading. Water treated at ETP is further treated at zero liquid discharge plant before being recycled for utilities (cooling tower) and flushing purposes.

Site has MBBR based 80 KLD STP operating at 60KLD loading. Previously Site had two STPs of capacities of 5 KLD and 20 KLD which are no longer operational. Treated sewage is further utilised for gardening purposes. The storm water drainage system is connected to rainwater harvesting pond, excess water during heavy rain is discharged out.

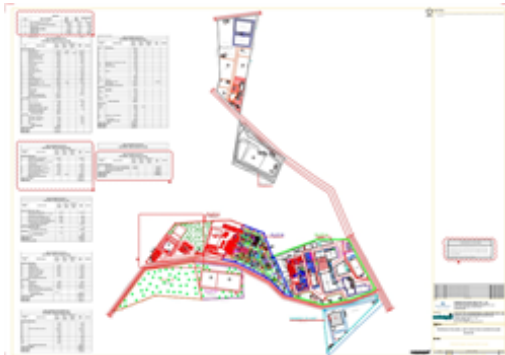


1.1.1_Layout map showing water & waste water infrastructures.PNG

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1.1.1_Att 1 Plant Layout.jpg

Comment Site is located in Nashik in the Maharastra state of India.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Following are the four shared water challenges for the region

1. Poor groundwater quality in respect of higher concentration of nitrate and presence of microbial contamination. Higher concentration of nitrate is mainly due to significant agriculture activities. Groundwater being the major source for drinking water, this could have serious health implications for the community.
2. Inadequate availability of water during summer season. Although Nashik region is not identified as water scarce region, there are concerns raised about scarcity of water during summer season. This could be mainly due to absence of proper rainwater collection and use, and heavy dependence of rainwater for agriculture activities with inefficient irrigation practices.
3. Inadequate maintenance of IWRAs such as poor condition of water harvesting structures result in inadequate percolation and heavy siltation. For example, absence of management of tributaries, regular desiltation of dam, upkeep of weirs, maintenance of drains etc.
4. Absence of proper solid waste management results in poor quality, blockages in drain leading to ineffective percolation to aquifer. Presence of plastic packagings, PET bottles in drains not only result in flooding but also lead to microplastics in water. However, there is no study to support this fact specific to Nashik.

Comment Although site has identified the following shared water challenges, the prioritisation for action to mitigate these shared water challenges is not systemically done. There are several large scale projects on water management being implemented within the region, however, how these are prioritised for mitigative action is not clearly detailed.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.2	
0.1.2.1	<i>Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.</i> Comment The water withdrawal point at the Karanjwan dam, pipeline bringing water to site, water treatments plants at site, effluent treatment plants, sewage treatment plant, and rainwater harvesting structure including the recharge pit.
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i> Comment There is only one catchment. However, site has not defined this catchment properly based on a scientific method.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> Comment Yes. the proposed certification is under control of one management system.
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i> Comment Yes the proposed certification is homogeneous with primary production system. water management, product or service range and main market structures.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



closed

Comment Plant layout delineates the site boundaries. Site has basically 4 separate land parcels adjacent, which are bottling plant, distillation unit, winery plant and Neev (training centre). Winery plant is not in operation during the audit period. The training centre, is used only when programs are conducted, which includes a rainwater harvesting pond, aw water and sewer network is in draft layout, as built drawing is not prepared. Effluent treatment and water treatment layout maps for the main plants are available. All drawings are attached. The site identifies 2 km radial area around the plant as core area and 5km radial area as buffer zone as the catchment area from the plant, however that does not meet the definition of a catchment in AWS standard or a generally accepted terminology. Besides, the area does not include the source of water for the site (Karanjwan dam) or its drainage basin. As catchment is a cornerstone of water stewardship, the identification of it needs to be addressed prior to certification.

Finding No: TNR-015047

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

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

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



in progress

Comment Site has a process to identify stakeholders in various groups including, vulnerable, women, minority sections and regulatory bodies, implementation partners and local governing bodies. This identification does not include indigenous people group. Evidences of stakeholder consultation are also presented through their CSR programmes. The engagement frequencies based on their level of interest and influence, are presented in the documents attached. Minor NC raised on deficiencies in stakeholder identification and detailed in the NC report.

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Finding No: TNR-015059

- 1.2.2** *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*  in progress
- Comment The attached document depicts the degree of influence and interest on water related issues between site and stakeholders. In this respect of the ultimate water source, the only one stakeholder namely Water Resource Department was identified. Other stakeholders in the receiving water source area has not been identified, due to inaccurate identification of catchment area. Minor NC raised in this respect.

Finding No: TNR-015060

- 1.3** *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*
- 1.3.1** *Existing water-related incident response plans shall be identified.*  in progress
- Comment Site has developed incident response plan related to ETP operations, chemical spillage, spource contamination, source non availability, pipeline rupture as per the attached procedures (attached). Minor NC raised for non identification of specific requirements for management of emergency during earthquake.

Finding No: TNR-015105

- 1.3.2** *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*  in progress
- Comment Site has prepared water charts based on the monitoring the incoming water from dam, transit losses, storage, lossess in process and outflows including raiwater collected and reused. Water use in NEEV (training centre) as well as discharges are not identified. Similarly attached document, water use in winery plant identified but discharges are not in the water balance chart. Storm water generation and discharges are not identified in the water balance considering all three separate land parcels belonging to the site.

Finding No: TNR-015106

- 1.3.3** *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*  in progress
- Comment Site water balance identifies inflows, outflows and losses. Attached is the water balance chart. Site also tracks the variation in water usage rates on monthly basis. However, site's quantification in some are not complete as detailed in minor NC raised.

Finding No: TNR-015107

- 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 Site conducts water quality test for raw water, treated water, trade effluent and sewage. The raw water quality meets the IS 10500 standard for drinking water purpose as per the external lab report 14 June 2024. Ph, TDS, hardness and turbidity are measured internally on regular basis. Both inlet and outlet effluent quality is monitored by both external and internal laboratories. Inlet quality of sewage and outlet concentration of treated swage are monitored regularly. Attached documents show the results.

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

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Comment	Plant layout identifies the locations of chemical storages, diesel and hazardous waste. Details are provided in the map. Most of these places are protected with dyke to prevent spillages. However, during site visit, containment arrangement was found not adequate / not available in chemical storage in STP and near Hcl tank. Photographs attached.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 in progress
Comment	Site has identified a canal which pass through the factory as the IWRA within the site (layout map attached). This canal contains water only when irrigation department releases the water. The site carries out regular inspection and cleaning as per defined frequency (attached the records of June and sept 24). However, the present status of the IWRA is not satisfactory and hence minor NC raised. In addition, site has identified rainwater harvesting structure also as an IWRA. This needs to be corrected, as RWH structure is not considered as IWRA, it is only water infrastructure for the factory.	
		Finding No: TNR-015188 Finding No: TNR-015189
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 in progress
Comment	Site water related cost compilation only covers the water purchase cost, water treatment cost and wastewater treatment cost. This does not include all water-related costs associated with water stewardship activities such as water efficiency improvement programmes, IWRA maintenance costs, RWH maintenance costs, catchment area water harvesting structures development and maintenance costs including theirsocio-cultural, environmental and economic value. Minor NC raised.	
		Finding No: TNR-015190
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 in progress
Comment	Site has identified the number of WASH facilities provided in the factory. The assessment of the same with respect to Maharashtra Factory rules is available. As per the document attached, as per the factory act, female employees to have 16 latrines/WC in bottling section whereas only 12 have been provided. Adequate numbers were available in Distillation as per the record.	
		Finding No: TNR-015191
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 in progress
Comment	Site has conducted a comprehensive supplier assessment through an external consultant. Report is attached. The study focussed on the GNS and glass suppliers, major primary inputs. Site has also collected quantity of water used by these major supplier. Water risk assessment of the main suppliers using aqueduct is also presented.	
		Finding No: TNR-015192
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 in progress
Comment	Site has identified the services used by the company such as finished good transportation, construction activities. The site has not identified embedded water used by these outsourced services.	

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Finding No: TNR-015193

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

Comment Site has conducted a supply chain assessment through an external agency for GNS and glass suppliers. Site has also engaged with GNS supplier and glass suppliers to receive water consumption data as per the attached document. Site has also obtained water use information for the grains procured for the distillation.

Score 7

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *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.* ✔
Yes

Comment Site has identified major policies of the government such as National Water policy, Maharashtra state level policies, water quality monitoring policies. Water user group or committee is identified as one such initiative for collective actions along with community members.

1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔
closed

Comment The attached legal and regulatory document Nashik Environment Legal Register does not indicate the legal requirements specific to water under various laws or regulations. For example Factories Act, Water (Prevention and Control of Pollution) Act and the Water Resources department requirements are not included in the above document. Compliance specific to water consent was available for review.

Finding No: TNR-015330

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

Comment Site has identified the catchment level water balance based on the data /document collected from Water Resources Department and other government agencies like MPCB and CPCB. The data covers water uses for various purpose upstream and downstream of the dam, recharge based on rainfall and seasonal variations. (document attached)

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

Comment Catchment level water quality from the published data from MPCB and CGWB compiled by the site is attached. In addition, Site has started monitoring a few parameters on water quality. Reports attached. However, these do not include physical and biological parameters. Also trend analysis based on seasonal variation has not been carried out by the site. Minor NC raised.

Finding No: TNR-015197

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

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Comment Based on the interaction with community members and government bodies such as water resources department, site has identified important water related areas in the region. Mainly bandharas and check dams built across the streams feeding into Kadwa and Kolwan river. Six IWRAs are identified and the conditions are assessed and presented in the attached document.

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

Comment The existing and planned infrastructure for the region by the government has been identified in the attached document such dams, upper godavari project and water diversion schemes. However, the same does not include the condition of these infrastructures and potential exposure to extreme events , especially from climate change impacts. Minor NC raised.
Finding No: TNR-015199

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

Comment Site conducted community survey in Awankhed, Valkhed, Lakhmapur, Mheluske, Oze, Kadawa Mhalungi, Umrade Khurd, Pade, Chelharpada and Deogarh to assess the existing condition of WASH infrastructure. Report attached. About 85-90% of the catchment population have access to good water and wastewater services.

1.5.8 *Advanced Indicator
Efforts by the site to support and undertake catchment level water-related data collection shall be identified.*  No

Comment Site has initiated process of catchment level data monitoring for borewell water. A schedule of monthly monitoring is available for borewell water quality. However, this doesnot provide the water quality of the catchment level, catchment identification done by the site is not correct. In addition, wate quality monitoring is limited to a few chemical parameters, physical and biological parameters are not covered.

1.5.9 *Advanced Indicator
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.*  N/A

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*  in progress

Comment Site has identified shared water challengs based on the need survey conducted through implementation partners in the region. Shared water challenges, poor water quality, lack of solid waste management, deteriorating water structure and lack of local water resources. However, it is not evident how these are prioritised for initiatives. Baseline survey results and the compiled shared water challenges are attached.

Finding No: TNR-015202

1.6.2 *Initiatives to address shared water challenges shall be identified.*  Obs.

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Comment	Site's CSR initiatives are focussed on addressing the shared water challenges. These programmes are implemented through implementation partners namely Ecosan, Techno Service, WOTR, Vanbarai etc. Projects are mainly directed for improving availability and quality of ground water, improving sanitation activities etc. Under WAL (Water, Agriculture and Livelihood) programmes, the group focuses on harnessing water through water harvesting structure both for ground water and surfacewater, enhancing efficient use of water through micro irrigation in agriculture and WASH facilities improvement in schools and menstrual hygiene. Attached documents provide evidences. The site identified only the site's own initiatives. It should also look whether there are also any other initiatives (initiated by others) that also aim to address shared water challenged – this could point to possible areas for collaboration or collective action.	
1.6.3	<i>Advanced Indicator</i> <i>Future water issues shall be identified, including anticipated impacts and trends</i>	 Yes
Comment	Site has carried water risk assessment using water risk filter and projected scenarios under optimisitic, pessimistic and current trend pathways. The study also details on risks on regulatory, physical and reputational. Trends on scenarios presented for 2030 and 2050. However, same does not provide the anticipated impacts specifically for the site. Relevant documents attached.	
Score	3	
1.6.4	<i>Advanced Indicator</i> <i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 No
Comment	Site has shared a draft environmental impact assessment report conducted for the proposed 16 KLD grain based distillery in 2017. This is done about 7 years back and it may not have much relevance in 2024. In addition, this is mostly identifies the impacts on environment due to proposed project in 2017. It doesnot include identification of potential social impacts with specific focus on water, resulting in social impact assessment. (attached EIA report)	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	The water risk at Nashik level document provides potential costs and business impacts for 2040 scenario. The sustainability strategy of NSB and NSD provide water saving initiatives and benefis. Operational level risks are identified at the aspect impact assessment documents. Attached are relevant documents	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Obs.
Comment	Site has identified several water saving initiatives within the manufacturing operations. Cost of savings are identified as per the attachement. However, these initiatives are limited to site operations. The opportunities within the catchment level are not identified for its assessment and prioritisation of potential savings and business opportunities. For example, site conducts several CSR initiatives which are yet to be assessed in this way. Observation raised	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes

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Comment	Site has identified OECD principles for water governance, water governance in the context of development assistance documents. Some of the practices are already as part of the CSR initiatives also (baseline surveys).	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	Site has identified sector level or catchment level best practices identified from various sources such as BIER water replenishment insights final, BMPS for industrial best practice, water conservation best management practices guide and other BIER best practices. Documents attached.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	Site identified best practices water quality from guidelines for use of treated effluent for irrigation, water use and water recycled based on context, best management practices for recycle reuse, spill prevention, soil management and vegetation. (Documents attached).	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	Site has identified best practices defined in the maintenance of IWRA for manual on artificial recharge of ground water by ministry of water resources, compendium-of-Best-Practices-in-Water-Management by Niti Ayog, Government of India. Documents attached.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	Site has identified sector best practices such as sanitation infrastructure development, hygiene education and solid waste mangement. Relevant documents are attached.	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	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.	
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	 Yes
Comment	Policy commitment signed by Plant Head dated 28.10.2024 does not directly mention about resource allocation for implementation of the standard, however, the same is mentioned indirectly in the last paragraph of the statement.	
2.1.2	Advanced Indicator 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.	 Yes
Comment	The statement signed by CEO is publicly displayed at the notice board and also in the website. (https://www.pernod-ricard.com/sites/default/files/inline-files/PRIPL.pdf).	
Score	1	
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.	
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	 in progress
Comment	A system for legal compliance monitoring has been established. The organogram on legal compliance is presented, however it is not clear which person/ position is responsible for legal compliance for water and wastewater management. Attached is the copy of the organogram. Only for environmental statement to MPCB, there is a flow chart indicating the person responsible for reporting to Pollution Control Board. Prime Environment and Sustainability Playbook details about environmental compliance requirement and environment and sustainability committee. However, there is only a draft committee which does not clearly define responsibility for ensuring legal compliance. Finding No: TNR-015290	
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	 Yes

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Comment	The document S&R strategy toolkit 2022 is presented which define organisational goal of 100% of water balanced in high risk countries by 2030 which includes Nashik plant also. Nashik site has already achieved this goal.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> - 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.	 closed
Comment	Site has presented water road map & performance and also water stewardship achievements of 2023-24 for the catchment. Site has achieved the water positive status in line with the organisation goal. However, comprehensive water stewardship plan aligning with the shared water challenges in the region with planned action, timeframe, financial budgets and responsibilities could not be shown.	
Finding No: TNR-015291		
2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	 N/A
2.3.4	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i>	 N/A
2.3.5	<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>	 N/A
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 in progress
Comment	The water risk at Nashik level document provides potential costs and business impact for 2040 scenario. However, there is no documented plan for mitigating or adapting risks in coordination with public sector or infrastructure agencies. Although site mentioned that they are in discussion with Water Resources Department for desliting activities.	
Finding No: TNR-015292		
2.4.2	<i>Advanced Indicator</i> <i>A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 N/A

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✓ Yes
Comment	The evidences of various projects being implemented for improvement in water quality, implementation of water harvesting structure and improvement in WASH infrastructures include good governance practices like participation in meetings, interacting with local bodies, organizations on water-related studies, formation of self help groups and/or consultations. Examples include Saksham project, Ankur Udayam program and Project Unnati, documents of which are attached.
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. ✓ Yes
Comment	Water is allocated to the site by water resources department as per rules and regulations for various uses such as domestic, agriculture, and industrial. As per the consent to operate issued by Pollution Control Board to the site, there is no requirement to allocate water to community including indigenous people. However, CSR projects of PRI do benefit the indigenous people of the area.
3.1.3	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified. ✗ No
Comment	Site has provided documents on Prime Environmental and sustainability play book and environment and sustainability committee charter. However, it is not evident whether these lead to improvements in water governance capacity from a site selected baseline date, as there no site specific date for baseline identified.
3.1.4	Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified. ✓ Yes
Comment	The testimonials from beneficiaries and the implementation partners' reports show that the several stakeholders agree that the site has positively contributed towards good water governance, through stakeholders engagements, formation of committees, projects monitoring etc. copies of these reports attached. During the interaction with stakeholders during the audit, they mentioned about site's involvement and contribution for good water governance.
Score	2
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. ✓ closed
Comment	Documents such as Nashik Environmental Legal register, quarterly compliance reports and annual reports to Pollution Control Board are evidences of legal and regulatory compliances of the site. The environmental legal register identifies the requirements, regulatory body, frequency of monitoring, reporting etc. Process for verification of legal and regulatory compliance not effective. Major NC raised.

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3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	 Yes
Comment	Site is not legally mandated to supply water to any communities including indigenous communities as per Consent issued by Pollution Control Board. Further, the water is allocated to the site by water resources department as per rules and regulations. Site has not exceeded its water withdrawal above the allocated volume.	
3.3	Implement plan to achieve site water balance targets.	
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	 Yes
Comment	The attached document on catchment level water balance performance report show that they are already meeting the organisation goal of water positivity for the site, which is 4.5 times water positive in 2023-24. Site level water reduction programmes and achievements are line with the targets set for the site. Documents attached.	
3.3.2	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.	 Yes
Comment	The annual targets for water use efficiency for bottling plant and distillation plants are separately defined and monitored. Bottling plant KPIs are met in line with target, whereas the distillation plant actual water use ratio is more than target. Reasons are analysed and actions are in place. Relevant documents are attached.	
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	 Yes
Comment	There is no legal binding for the site to re-allocate water to social, cultural and environmental needs. As per the consent site should recycle 100% of treated effluent with the plant premises.	
3.3.4	Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.	 N/A
Comment	Not applicable for the site	
3.4	Implement plan to achieve site water quality targets	
3.4.1	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	 in progress
Comment	Site has not identified water quality targets in the water stewardship plan. Legally mandated effluent quality standards stipulated in the water consent are being complied. NC being raised.	
	Finding No: TNR-015305	
3.4.2	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.	 Obs.
Comment	Site's effluent quality meets the consent requirements. Site has plan to upgrade to meet the additional effluent load from malt. Although there is a plan of ETP improvement, no continual improvement plans to achieve best practice for site's effluent.	
3.5	Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	

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3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.		in progress
Comment	Site has demonstrated plans and programmes for cleaning the canal running through the plant. Feedback on the status of the canal subsequent to each time's cleaning has also been obtained from Panchayat. Procedure for regular cleaning and record & photos of the same were also available. However, on the day of the audit during the site round, the condition of the canal was found not good and does not give an impression that it is maintained in good condition at all times. The waste including patches of oil was noticed in side the canal. Photo attached.		
Finding No: TNR-015307			
3.5.2	Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.		No
Comment	Projects Ankur Uday, Saksham and Jalsanjeevani (improvement in water quality, availability) reports are the examples submitted by the site, which has completed several water harvesting structures for improving agriculture and thus sustainable livelihoods in the region. These are newly developed water harvesting structures and not specific to improving the non functioning or severely degraded IWRAs.		
3.5.3	Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.		No
Comment	Evidence of letter from panchyat about cleaning activities done for canal is attached. Consideration may be given to obtain stakeholders consensus from a wider range of stakeholders rather than limiting only to one or two stakeholders.		
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.		
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.		Obs.
Comment	Site has assessed the WASH provisions as per Factories Act. System for regular inspection of onsite facilities is also established. DW points, wash stations are mapped in the attached document. The drinking water test report is also attached. During the site tour it was noted that onetoliet for workers in distillation plant is not maintained in good condition both from infrastructure and hygiene point view. However, the records of inspection for the same day shows all in good condition.		
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	There is no evidence to indicating that the site impinges on the human right to water and sanitation. Site continuously makes efforts to reduce the water use for their operations and there is no effluent discharge outside the plant premises.		
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 hvaiene awareness shall be identified.		Yes

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Comment	Hygiene awareness is conducted through various training programmes through implementation partners. Project Unnati focussed on menstrual hygiene and WASH at the village (document attached). Site has also provided drinking water provision in schools; 3 schools are provided with RO drinking water provisions in 2022-23.	
Score	5	
3.6.4	<i>Advanced Indicator: In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i>	 N/A
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Obs.
Comment	There was no indirect water use target set in the water stewardship plan, as it was stated that there are no major suppliers from the same catchment. However, this may not be true as the catchment identification does not meet the requirements. This indicator will need to be re-visited when the catchment identification is addressed.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 in progress
Comment	Site has conducted supply chain assessment through an external agency (copy of report attached). The report identifies the water use by various identified suppliers. However, this does not include the service providers. In addition, it is also not evident what actions are being initiated as a result of site's engagement in managing the water risks in the supply chain. Minor NC raised	
Finding No: TNR-015311		
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 No
Comment	Site has carried out a study on supply chain which includes the water use by the major suppliers, current practices followed. The study does not bring out the water risks and challenges for these suppliers and the actions taken to address the risks. Supply chain assessment report attached.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	Site carries out rejuvenation of water retaining structures, ponds and irrigation canals. One example is rejuvenation of Nalwadi canal and pond where several farmers and villagers depend upon for the irrigation and domestic use. Details of completion of work confirmed by Panchayat and feedback of relevant stakeholders are attached. During the interactions with stakeholders at the catchment area, they mentioned about the benefits of rejuvenation work done such as availability of water for farming and improvement in water level in borewell.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	

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3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Some of the best practices on water governance implemented by Site is interaction with goevernments and other agencies, formation of water user committees, consultation meetings, monitoring and reviews. A reports of baseline survey and actions implemented are presented in the reports attached.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Site has implemented best practices such as identification of baseline water use data, target for achieving the water positive for Nashik, and collection of water in collaboration with others. etc. The report identifies the best practices implemented for the site.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Actions taken by the site towards achieving best practice on water quality are provision of RO units, water ATMs, community level sensitisation for good water quality, consultation on water quality wirh water user groups etc. Examples are attached.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Actions taken towards best practices related to maintenance of IWRA in the catchment are detailed by the site. Some examples are the rejuvenation of check dams, dug wells. Sample testimonials and actions taken with photos are attached	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The focus areas on actions implemented towards best practices related to WASH are mensural health management, development of women development centres, sanitation including contruction of toilets. Schools and community centre where WASH improvement programms conducted were visited and found to be implemented as per CSR reports.	
3.9.6	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	One of the best practices implemented by the site is number of water user groups created as best practices for good water governance. For example 7 for Ankur Uday, 3 for Saksham, 4 for Jal Sanjeevani water user committees. In addition, there are several meetings for implementation and progress review with the WUC, implementation partners and panchayat sarpanch and other members. More details are in the attached document.	
Score	8	
3.9.7	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	Site has implemented structures taking into consideration of locations, contours, geological formations which included check dams, ponds, earthen nala bunds, farm bunds, gabions etc. These have led to water positive status for the Nashik plant. In addition, water efficiency programmes implemented within the site reduction in water use ratios significantly. About 19% reduction in bottling plant and 39% for distillation plant for specific water consumption over 3 years.	
Score	8	

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3.9.8	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 No
Comment	Site has provided RO drinking water unit and water ATMs as examples of best practices related to water quality. This indicator is focussed on improving the water quality both for freshwater and effluent. The provision of RO water unit and water ATMs are considered as part of WASH facilities.	
3.9.9	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes
Comment	Out of the total 39 structures, 11 IWRA's were noticed under depleting conditions as per survey and the site has done rejuvenation for 8 structures. These include revamping of checkdams, dug wells and desilting activities to improve the water holding etc. Details are provided in the attached report. These activities helped one rabi season crop for farmers.	
Score	8	
3.9.10	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	Implementation of best practices in WASH such as awareness on Menstrual hygiene, sanitation, drinking water quality, number of WASH facilities have been resulted in several benefits. These include installation of RO water units in 6 schools, toilets in 3 schools, awareness on menstrual health and hygiene, 8 Adolescent girls groups with 80+ active participants, establishment of 2 Women's Development Centers, 8 village level MHM systems (pad vending machines), 3 schools with proper WASH facilities for girl students and teachers and capacity building in 8 communities and 3 schools. Additional documentation and details are attached.	
Score	8	
3.9.11	<i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 No
Comment	PRI has actively participated in In-person BIER Water Collaboration Meeting held on 22 April 2024 in New Delhi. PRI discussed on activities related watershed management, Agri & livelihood creation, etc. The focus was Ganges-Brahmaputra Yumana river basin. Specific aspects related to Nashik or Godavari basin not presented.	
3.9.12	<i>Advanced Indicator</i> <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 N/A
3.9.13	<i>Advanced Indicator</i> <i>Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 N/A

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4 STEP 4: EVALUATE - Evaluate the site's performance.		
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	Q Obs.
Comment	Site's water efficiency targets are defined for bottling plant and distillation plant and the progress of achieving these targets are indicated year to year in the attached sheet. From a long term perspective these in are in line with overall goal. For catchment level, the goal is to achieve water positive for Nashik region by 2030, which the site has already achieved. However, the site has not preped a comprehensive report on target versus progress for other shared water challenges. For example, water quality, solid waste management, WASH infrastructure improvement etc.	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	Q Obs.
Comment	Site has carried out a cost benefit analysis of various water saving initiatives implemented within the factory. The economic, environment and social values for each interventions are evaluated and presented in the cost benefit analysis sheet. While the NSK impact assessment report- IDTV also identifies the intervention impacts, it is not clear from environment, economic and social. Observation is raised.	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	✓ Yes
Comment	Site has provided a report on NSK Impact Assessment report - IDTV, which provides details of benefits to the stakeholders. This includes improvement in ground water recharge and storage - increased availability of water for both agriculture and domestic use, resulting in increased yield per acre thus increased financial benefit. Average yield for wheat gone up from 16 to 20 quintal per acre and for onion from 70 to 100 quintal per acre subsequent to the interventions as per the report.	
4.1.4	<i>Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>	✗ No
Comment	Monthly steering committee meeting namely "Nakshtra" (records of two meetings attached) reviews the performance of water use ratio of the plant. However, there is no evidence that reviews of shared water challenges, risks and opportunities and water cost savings or benefits realised are done in such meetings comprehensively.	
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>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	✗ in progress

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Comment Water incident plans are in place. It was stated that there was no emergency incidents in the last one year. While reviewing the ERPs for water, it was found that implementation of preventive measures as defined in ERPPs are not implemented, nor these are reviewed for its adequacy. For example, ERP for water identifies measures such as alternate source identification (borewell, water tankers), vulnerability mapping, automatic monitoring through SCADA or IOT, which are not established. Spill control measures identifies the containment provisions for chemical storage areas, however, some areas are noticed with inadequate or absence of containment areas. For example STP and chemical storage adjacent to HCl tank. Minor NC raised.

Finding No: TNR-015103

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

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


Yes

Comment CSR programme has an established system to conduct a need assessment which includes interaction with the concerned stakeholders and the feedbacks are considered in the program finalisation. Similarly at the completion of each program an impact assessment is conducted which also provides the testimonials from the beneficiaries and other stakeholders. Sample program and photos of consultation meetings are attached.

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


No

Comment Headquarters' efforts to address shared water challenges are assessed on the basis of stakeholder feedback. However, only CSR projects and the views of communities, sarpanch panchayat and beneficiaries are considered. The views of stakeholders such as public sector agencies, infrastructure development agencies and regulatory bodies, which could cover the five outcome areas of AWS, have not been taken into account.

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

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


in progress

Comment Site has provided compiled sheet of learnings and challenges from WASH projects (attached). However, how these learnings are incorporated in the water stewardship plan is not evident.

Finding No: TNR-015321

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5STEP 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.	 Obs.
Comment	Attached is the organogram for compliance to local laws and regulations related to water and excavation matrix and displayed at the main gate. However, it is not clearly stated which position is responsible and accountable for compliance.	
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.	 in progress
Comment	The attached water stewardship report of 2023-24 mainly is a performance report of water positive status of the company for each site. The same does not include the water stewardship plan for the site based on shared water challenges. How the water stewardship performance is contributed to all the five AWS standards outcomes not described and how this is communicated to relevant stakeholders, is not evident.	
Finding No: TNR-015323		
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.	 in progress
Comment	Integrated report FY 2024 of the company generally describes about the water stewardship and the performance for the whole organisation (page no, 80). This does not provide Nashik site level performance. Universal registration document attached also does not provide quantified performance against target for this site. CDP disclosure partly covers the Nashik site performance, however, the performance data is of 2021.	
Finding No: TNR-015325		
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	 No
Comment	Integrated Report of the Company does not disclose the site's efforts to implement AWS standard	
5.3.3	Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	 No
Comment	Although site has described very briefly company's efforts in water management, it has not explicitly provided quantified performance of the company from implementing AWS standards on the Annual report.	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	

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5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*  No

Comment Site's CSR report 2023-24 describes all CSR activities of the company. The report covers the interventions of the company with regard to enhancing water availability through recharge, better irrigation practices & rainwater harvesting and good water quality, sanitation & hygiene. Such disclosures do not include the activities being performed inhouse and also programmes for improving water quality, wastewater quality etc. In this respect, all shared water challenges and the efforts made to address the same are not disclosed.

Finding No: TNR-016082

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

Comment The attached CSR report 2023-24 describes about the efforts made by the company in terms of engaging with key stakeholders such as communities, farmers, women and panchayat to implement various interventions. Evidences to show that they coordinate with public sector agencies in addressing shared water challenges may also be included in CSR report.

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

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

Comment Site has not identified water related legal compliance violations and hence there was no disclosure made. However, there are legal non compliances identified in this audit (detailed in 3.2.1) which require associated correction and disclosure to stakeholders.

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

Comment Site has not identified water related legal compliance violations and hence there was no disclosure made. However, there are legal non compliances identified in this audit (detailed in 3.2.1), which require root cause identification, corrective action implementation to prevent recurrence and disclosure to relevant stakeholders

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

Comment Site has confirmed that there is no site water related violations that may pose significant risk and threat to human or ecosystem which need to be communicated to regulatory agencies.

Photographic Evidence from Audit

 Yes

Comment Attached the photos taken during the audit.

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.  Yes

Comment This is the initial certification audit.