

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001884

SITE DETAILS

Site: **ITC Limited Foods Division - Malur**

Address: Gangapura Village, Yeshwanthapura Gram Panchayat Malur Taluk, Malur, Karnataka, INDIA

Contact Person: Nitesh Nandlal Lunawat Jain

AWS Reference Number: AWS-000058

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2026-Mar-11

Validity of certificate: 2029-Mar-10

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Dec-15

Audit End Date: 2025-Dec-18

Lead Auditor: Suraj Upadhyay

Site Participants:

Girish H V EHS Executive,
Harish Babu H RSRO Program Manager,
Priyanka Mitra Program Executive,
Ansh Gupta Manager - HR,
Noel Fernandes Manager - HR,
Chitranjan Thakur Manager - Finance,
Chidambaram S Assistant Manager - Manufacturing Excellence,
Rahul Singh Sr. Maintenance Executive,
Raju Das Manager - Maintenance,
Balachandra - Executive - Security / Admin,
C Chethan Kumar MSK Consultant,
Sanjana P Civil Engineer - MYRADA,
Nitesh Nandlal Lunawat Jain Manager-Sustainability,
Manchiraju Nagendra - Senior Manager - Operations,
Muthu Krishna Moorthy General Manager,
Arun Gopalswamy Factory Manager,
Megha M Assistant Manager - EHS,
Sasikumar S Senior Technical Associate,
Naresh Kumar Senior Executive - Materials,

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 3 non-conformities and 11 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 04 February 2026.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline, evidence is to be submitted to WSAS (within 75 days) by 03 March 2026.

The audit team recommends re-certification of ITC Malur at the Platinum level pending closure of the non-conformities.

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

The client company operates a manufacturing facility located in Malur Taluk, Kolar District, Karnataka, India, approximately 20 km from Malur town and about 45 km east of Bengaluru city. The assessment covered all on-site facilities and operations, including production units, utilities (boilers, cooling and compressed air systems), water treatment and storage infrastructure, rainwater harvesting systems, wastewater treatment and reuse facilities, internal drainage, and WASH facilities. The site's core activities include food processing and packaging, with outputs comprising finished consumer food products, supported by auxiliary activities such as cleaning, utilities operation, and material handling.

The facility is situated in a hard rock terrain dominated by granitic-gneiss formations, characterized by limited surface water availability and dependence on groundwater from fractured aquifers. The area falls within a semi-arid to sub-humid climatic zone, with seasonal rainfall and groundwater recharge primarily occurring during the monsoon through tanks, check dams, and artificial recharge structures. The catchment is largely rural-agricultural, with traditional tanks playing a critical role in local water storage and groundwater replenishment.

The audit was conducted onsite on 15-18 December 2025.

The onsite site visit included assessment of the production areas, utilities (boilers and water use points), raw water abstraction and storage systems, rainwater harvesting structures, water treatment and reuse systems, wastewater treatment and Zero Liquid Discharge infrastructure, stormwater drainage, fire water systems, and WASH facilities. In addition, catchment-level interactions and field verification were carried out at selected tanks, recharge structures, schools, Anganwadis, and agricultural fields, along with stakeholder consultations with community groups and local institutions as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	11
Non-Conformity	3

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FINDING DETAILS

Finding No: TNR-022769
Checklist Item No: 1.2.1
Status: Open
Finding level: Observation
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 stakeholder list does not explicitly categorize or label these stakeholders under the specific categories required by the indicator. It is therefore recommended that the site clearly classify stakeholders in line with the AWS categories (e.g., vulnerable groups, women, minority groups, and Indigenous peoples, where applicable) to improve clarity and demonstrate full conformity with the indicator requirements.

Finding No: TNR-022467
Checklist Item No: 1.3.1
Status: Open
Finding level: Observation
Checklist item: Existing water-related incident response plans shall be identified.
Findings: The site has prepared an On-Site Water Emergency Response Plan (OSWEP) and listed key water-related emergency scenarios, including (i) water contamination, (ii) water scarcity due to groundwater depletion, (iii) interruption/non-availability of supply from the authorized water supplier, (iv) wastewater overflow, and (v) climatic events (droughts/floods). However, the OSWEP annexures (Page 15–19) do not clearly set out the corresponding response arrangements for the identified scenarios (ii) and (iii). While the scenarios are identified, the plan lacks sufficiently detailed response actions, assigned roles/responsibilities, and mitigation measures.

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Finding No: TNR-022468
Checklist Item No: 1.3.2
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Mar-18
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site has prepared a water balance; however, in several sections the balance does not identify intermediate losses and storage between inflow and outflow, as required under the AWS indicator. For example, in the Chemical Preparation area, Domestic Canteen, Plant (Domestic), Noodle Line-1, Noodle Line-2, Noodle Line-3, Kneader, Pasta, and S/B sections, only total inflow and final outflow have been reported. Water losses, evaporation, storage, or water embedded in product have not been identified. Consequently, the site water balance mapping remains incomplete and does not fully demonstrate traceability of water use across these processes in line with AWS Standard requirements.

Refer Page 22-23 of Step-1 PDF.
Corrective action: The site is working towards creating a holistic Water Balance that captures all the following aspects as identified in the NC:
1. Intermediate Losses
2. Storage between inflow and outflow (wherever applicable)
3. Water embedded in the product
Evidence of implementation: The Site has updated its Water Balance to detail out Evaporation losses, storage losses and water embedded in the Product

Finding No: TNR-022469
Checklist Item No: 1.3.3
Status: Open
Finding level: Observation
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: The site has prepared a water balance and quantified the annual variance in water usage rates; however, the water balance does not identify or quantify losses or storage between inflows and outflows. As a result, intermediate water uses such as losses, evaporation, storage, or water embedded in product are not clearly accounted for.

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Finding No: TNR-022764
Checklist Item No: 1.5.9
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.

Findings: The site has one packaging supplier, Ratna Packaging, which is located in the Hosur catchment. Accordingly, the site undertook a Core Area Perspective Plan (CAPP) exercise to assess the adequacy of WASH facilities within the Hosur catchment.

However, as per AWS requirements, the adequacy assessment is expected to cover all primary input suppliers' catchments. Against the total of nine (9) identified primary input suppliers, only one supplier's catchment has been covered under the CAPP exercise to date.

Finding No: TNR-022830
Checklist Item No: 1.6.1
Status: Open
Finding level: Observation
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.

Findings: Shared water challenges have been identified and prioritised based on site water data, catchment studies, stakeholder consultations, and Participatory Rural Appraisals. However, it is not clear if the site has done any additional or new efforts since the previous certification cycle to identify or update shared water challenges.

While it is acknowledged that groundwater depletion remains ongoing and continues to be the most urgent shared water challenge, an update is needed to reflect data/information updates or changes in stakeholder challenges.

It is therefore recommended that the site re-engage relevant stakeholders and consolidate the outcomes to clearly demonstrate ongoing identification and refinement of shared water challenges.

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Finding No: TNR-022765
Checklist Item No: 1.6.3
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
Future water issues shall be identified, including anticipated impacts and trends

Findings: The site has provided a forward-looking analysis describing how currently identified water challenges may evolve in the future, based on catchment studies and demand–supply projections. This analysis is useful as an outlook on the progression of existing issues.

However, Indicator 1.6.3 requires the identification and review of anticipated future water issues that may not yet be directly observable. While the site has briefly noted certain future issues—such as a recurring drought trend in Kolar District (approximately once every five years) and erratic/unusual rainfall patterns (fewer rainy days with increased rainfall intensity)—these points are presented only at a high-level and remain very brief, without sufficient assessment of anticipated impacts.

Overall, the submitted commentary primarily emphasizes projected improvements under planned scenarios and does not adequately identify or assess potential future risks, uncertainties, or emerging water-related issues—such as infrastructure deterioration, changes in demand patterns due to population growth and industrialization—along with their possible impacts.

Finding No: TNR-022831
Checklist Item No: 1.6.4
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.

Findings: The site has described several water-related activities and outcomes, including Zero Liquid Discharge (ZLD) operation, watershed interventions, and proactive data collection initiatives, and has characterized these primarily as having positive social benefits. However, while ZLD operation is cited to conclude that no negative social impacts exist from effluent discharge, the site has not assessed the potential social impacts of its groundwater abstraction, including possible effects on local community water availability, domestic users, or small farmers, using data or stakeholder feedback.

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Finding No:	TNR-022501
Checklist Item No:	2.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Mar-18
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:	The company has a Global Compliance Monitoring System (GCMS) in place; however, the compliance conditions stipulated under the Groundwater NOC—specifically the monthly submission of groundwater abstraction data to KGWA and the conduct and submission of pre-monsoon and post-monsoon groundwater quality analysis—are not mapped or monitored within the GCMS. Consequently, the site has not fully demonstrated systematic monitoring and management of all applicable groundwater regulatory compliance requirements in accordance with the AWS Standard.
Corrective action:	ITC has robust process for Compliance against the regulations It has a dedicated portal - GCMS to take care of the compliance requirements and for embedding any updates for the same During the audit it was found that several requirements related to Groundwater were maintained in an excel form and tracked accordingly To further strengthen the process the compliance process, ITC Malur is reevaluating the Ground Water NOC conditions and will update the same in the GCMS portal This will enable automatic reminders and embed any future changes in the portal
Evidence of implementation:	We have included the Ground Water NOC condition in our internal Gensuite portal, which is capable of giving automatic reminders and updates on the compliance points whenever the due date is near

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Finding No:	TNR-022503
Checklist Item No:	2.3.4
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator
Findings:	<p>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.</p> <p>ITC Malur has conducted water stewardship interaction sessions with group companies and suppliers located in another catchment. However, no documented evidence—such as meeting agendas, minutes of meetings, attendance records, or documented outcomes and action points—was made available for review. Only photographs of the sessions were provided in ITC Malur-AWS certification Manual Step 2, Page No. 18.</p>
Finding No:	TNR-022507
Checklist Item No:	3.7.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Mar-18
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	<p>As per ITC Malur-AWS certification Manual Step 2, Page No. 47, no documented evidence was provided to demonstrate that a target has been established for indirect water use. In the absence of defined targets or justification, the site has not adequately demonstrated conformity.</p>
Corrective action:	<p>ITC Malur has been on a journey to connect with its Suppliers in the Catchment and has been visiting their plants to discuss on their Water Use reduction initiatives</p> <p>The site is in discussion with the identified Supplier in the catchment to take a target on reducing its Water intensity</p> <p>The same will be updated in the Manual and accordingly we will modify the Water Stewardship plan that will reflect the Indirect Water use targets</p>
Evidence of implementation:	<p>ITC had reached out to the Major Flour supplier - Kesari Flour Mill for understanding their Water trend and for setting up a target</p> <p>Based on that they have taken a target of reducing their Water intensity by 9% as compared to 24-25 by the end of this year</p> <p>ITC based on the next year plan, will identify major suppliers as per the spend and repeat the process for their Major Suppliers in the value chain</p>

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Finding No: TNR-022508
Checklist Item No: 3.7.2
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site’s engagement related to indirect water use, shall be identified.

Findings: The site has claimed supplier engagement in the form of training and awareness sessions with the following suppliers: Mohini Corporation, ANS Paper Mills, and Swara Flour Mills.

While this claim is noted, adequate documentary evidence has not been provided to substantiate engagement with listed suppliers. Specifically, supporting records such as meeting agendas, training modules/topics, attendance sheets, or minutes of meetings were not submitted. Only photographic evidence related to one supplier was provided, which is insufficient to demonstrate engagement with all three suppliers.

Refer to Page No. 47 of ITC Malur-AWS certification Manual- Step 3.

Finding No: TNR-022832
Checklist Item No: 5.3.1
Status: Open
Finding level: Observation
Checklist item: A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.

Findings: A summary of the site’s water stewardship performance, including quantified performance against targets, has been disclosed to stakeholders at the catchment level. However, key water-regulatory stakeholders—specifically the Karnataka State Pollution Control Board (KPCB) and the Karnataka Groundwater Authority (KGWA)—were not included in the disclosure. In addition, the disclosure was not carried out with raw material suppliers located within the catchment.

Finding No: TNR-022515
Checklist Item No: 5.4.1
Status: Open
Finding level: Observation
Checklist item: The site’s shared water-related challenges and efforts made to address these challenges shall be disclosed.

Findings: The site has disclosed its shared water-related challenges and the efforts undertaken to address these challenges to stakeholders; however, some key stakeholders were not included in this disclosure.

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Report Details

Report	Value
Report prepared by	Suraj Upadhyay
Report approved by	Sa-Myeong Gim
Report approved on (Date)	2026.Jan.28

Surveillance

Proposed date for next audit
2026-Dec-14

Comment Next audit will surveillance 1.

Stakeholder Announcements

Date of publication	Location
31/10/2025	AWS Website
31/10/2025	WSAS Website
27/10/2025	ITC Website
30/10/2025	Local news paper in local language-Vijay Karnataka

Comment The announcement was publicly disclosed through multiple channels, including publication on the AWS website, WSAS website, and ITC website, as well as in a local language newspaper (Vijay Karnataka). In addition, the announcement was displayed at various strategic locations within the site and shared directly with relevant stakeholders to ensure wider awareness and accessibility.

AWS Website;
https://a4ws.org/wp-content/uploads/2025/10/AWS-000058_ITC-Malur-India_StakrAnn25.pdf

WSAS Website:
https://watersas.org/wp-content/uploads/2025/11/AWS-000058_ITC-Malur-India_StakeAn_WSAS-Published.pdf

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Comment The following stakeholders have been actively engaged in planning, implementation, monitoring, and review of water stewardship actions:

A. Community & Local Institutions

- i. Gram Panchayats (GP Presidents, PDOs, GP Members)
- ii. Tank User Groups / Water User Groups (26 TUGs)
- iii. Village & farming communities (lead farmers, beneficiaries)
- iv. Self Help Groups (SHGs)

B. Education & WASH Institutions

- i. School Development & Monitoring Committees (SDMCs)
- ii. Mothers' Committees
- iii. Child Cabinets
- iv. Government schools and anganwadis

C. Government & Public-Sector Agencies

- i. Karnataka Ground Water Authority (KGWA)
- ii. Karnataka State Pollution Control Board (KSPCB)
- iii. Zilla Panchayat & Taluk Panchayat
- iv. Departments of Agriculture, Horticulture, Forest, Water Resources
- v. Education Department
- vi. Women & Child Development Department

D. Civil Society & Technical Partners

- i. NGOs: MYRADA, WASHi
- ii. Technical & study partners: Geovale, Urdhvam
- ii. Academic institutions (e.g., IISc for basin-level studies)

E. Internal & Business Stakeholders

- i. Site management and employees
- ii. Service providers (water suppliers, canteen, housekeeping, utilities)

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Catchment Information

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Catchment Name:

The site is located within the South Pennar River Basin. More specifically, the operational influence area of the site lies in the Malur sub-catchment, which forms part of the South Pennar basin system. For water stewardship planning, an immediate priority catchment of approximately 5,400 hectares around the Malur unit has been considered, further expanded to a 10 km radius covering multiple Gram Panchayats and villages.

Water Supply & Discharge Catchment:

The site relies primarily on groundwater sources abstracted through registered borewells located within the South Pennar River Basin. Supplementary water is sourced through authorized tanker suppliers, who also abstract groundwater from the same basin. The unit follows a Zero Liquid Discharge (ZLD) system. All process effluent is conveyed to the on-site Effluent Treatment Plant (ETP), treated, and fully reused for gardening and toilet flushing within the site and the adjacent warehouse area. There is no discharge into surface water bodies, municipal drains, or marine environments. Stormwater generated within the premises is collected and routed to an on-site rainwater harvesting pond, ensuring no off-site discharge.

Groundwater Aquifers:

Groundwater abstraction in the catchment occurs from hard rock aquifer systems, typical of the Deccan Plateau geology. Two main aquifer zones are present:

Upper weathered aquifer: A shallow aquifer with limited storage, highly dependent on seasonal rainfall recharge.

Lower fractured aquifer: A deeper aquifer accessed through borewells, characterized by fractures in granitic formations and partially confined conditions.

Recharge primarily occurs through monsoon rainfall, percolation from tanks, check dams, and watershed structures. The groundwater is not protected by a continuous impermeable layer, making it vulnerable to over-extraction. The Malur Taluk and surrounding taluks are classified as over-exploited groundwater zones, emphasizing the need for recharge and demand management interventions.

Catchment Water Service Providers:

There is no municipal water supply serving the site. Water service providers include authorized private groundwater tanker suppliers, who source water from borewells within the same catchment.

All water treatment (raw water treatment, RO, and effluent treatment) is carried out on-site. Treated wastewater is reused internally, and no treated effluent is discharged into any river, lake, or drain. Stormwater runoff is harvested within the premises through a dedicated rainwater collection pond, contributing to groundwater recharge.

Catchment Features

- Water Shortage

The catchment faces chronic groundwater scarcity. Groundwater extraction significantly exceeds annual recharge, with average stages of development exceeding 170–180%, classifying the area as over-exploited.

- Flood Proneness

While the region is predominantly drought-prone, localized flooding may occur during intense monsoon rainfall due to rapid runoff and limited drainage capacity, particularly in low-lying agricultural areas.

- Environmentally Protected Areas

The catchment includes several Important Water-Related Areas (IWRAs) such as traditional tanks, check dams, and biodiversity conservation plots. These structures play a crucial role in groundwater recharge and rural water security.

- Inter-Basin Transfers

There are no significant inter-basin water transfers supplying this catchment. Water availability is almost entirely dependent on local rainfall and groundwater.

- Climatic Conditions

The catchment falls under a semi-arid climatic zone, characterized by moderate to low

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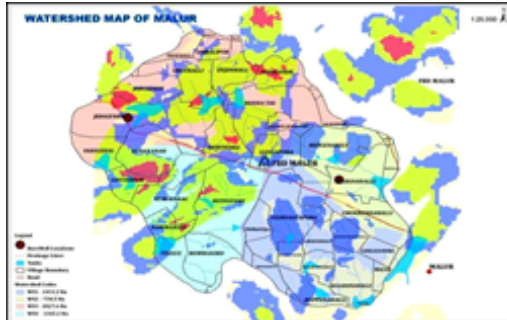
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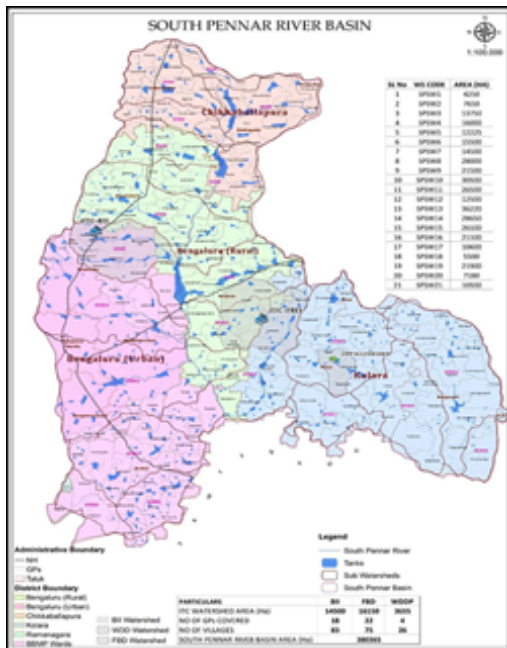
rainfall, high inter-annual variability, and frequent drought years.

- Dominant Water Uses

The drainage basin is dominated by agriculture, particularly rain-fed and groundwater-irrigated farming. Industrial water use is comparatively minor, but cumulative abstraction contributes to overall groundwater stress.



Watershed_Map_Malur_Enhanced_HQ.jpg



South_Pennar_River_Basin_High_Quality.jpg

Comment The site is located within the South Pennar River Basin.

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Client Description and Site Details

Client/Site Background

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Site Location:

The site is located at Gangapura Village, Yeshwanthapura Gram Panchayat, Malur Taluk, Kolar District, Karnataka, India. The nearest town is Malur, and the closest major city is Bengaluru, located approximately 40 km away.

Brief Description of Surroundings:

The site is not located within a designated Government Industrial Area. It is situated in a rural-industrial setting at Gangapura Village, Malur Taluk.

While the site itself is an industrial manufacturing facility, the surrounding land use is predominantly agricultural, with cultivation of vegetables, horticultural crops, and ragi, along with scattered rural habitations and limited industrial establishments.

The area reflects a mixed land-use pattern, where industrial operations coexist with agricultural activities, making groundwater and local water resources particularly important for both industrial and community needs.

Description of What the Site Produces:

The site manufactures noodles, pasta, and vermicelli.

Water use in production processes includes:

1. Noodles: Water is primarily used for dough preparation and seasoning on stretch conveyors.
2. Pasta and Vermicelli: Water is mainly used for dough preparation.
3. All product lines: Fresh water is used for line cleaning and boil-out operations to maintain hygiene and food safety standards.
4. Energy production: Steam required for process heating is generated using boilers, for which RO-treated water is used to prevent scaling and improve boiler efficiency.

Water-Related Infrastructure at the Site:

- Water Sources on Site:

- i. Three registered borewells located within the premises
- ii. Supplementary water sourced from authorized external water suppliers
- iii. No municipal water supply connection

- Water Treatment Facilities (WTP-225KLD):

- i. Raw water treatment system comprising sand filters, carbon filters, RO plant (12 m³/hr), chlorination, and UV disinfection

- Water Use for Production:

- i. Dough preparation, seasoning, and line cleaning for noodles, pasta, and vermicelli manufacturing
- ii. Water Use in Energy Facilities
- iii. RO-treated water used in boilers for steam generation

- Wastewater Treatment Facilities (200 KLD):

- i. On-site Effluent Treatment Plant (ETP) consisting of oil skimmer, equalization tank, DAF unit, aeration tank, clarifier, tertiary chlorination, and treated water storage tank

- Cooling Towers:

- i. A 500-litre cooling tower used for cooling compressed air systems

- Rainwater Harvesting Infrastructure:

- i. Rooftop rainwater harvesting system with storage (780 KL)
- ii. Rainwater harvesting pond within the premises

- Stormwater Management Infrastructure:

- i. Dedicated stormwater drains conveyance to rainwater harvesting pond

- Fire Water System:

- i. Dedicated fire water storage tanks (1193 KL) as per statutory safety requirements

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- Any Other Infrastructure:

- i. Separate treated water storage for reuse in gardening and toilet flushing

Wastewater and Stormwater Discharge:

- i. The site operates on a Zero Liquid Discharge (ZLD) basis.
- ii. Process wastewater is treated in the on-site ETP and fully reused for gardening and toilet flushing within the site and adjacent warehouse area.
- iii. Domestic sewage is also treated through the ETP cum STP system and reused.
- iv. Stormwater runoff from rooftops and paved areas is collected through stormwater drains and directed to the harvesting tank (780 KL) and the rainwater harvesting pond.
- v. No wastewater or stormwater is discharged outside the site boundary into surface water bodies or municipal drains.

Short Description of the Site:

- i. Number of employees: 904
- ii. Total site area: 7.358 acres
- iii. Built-up area: 5.191 acres
- iv. Nature of operations: Food manufacturing facility producing noodles, pasta, and vermicelli with integrated water and wastewater management systems



Location Map.jpg

Comment The site is located at Gangapura Village, Yeshwanthapura Gram Panchayat, Malur Taluk, Kolar District, Karnataka, India. The nearest town is Malur, and the closest major city is Bengaluru, located approximately 40 km away.

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Summary of Shared Water Challenges

Summary of Shared Water Challenges

ITC commissioned a Core Area Perspective Plan (CAPP) for the Sustainable Management of Water Resources and Water Security Programme in the Malur and Hoskote taluks to better understand the shared water challenges within the catchment in which it operates.

The primary shared water challenge affecting the site and other stakeholders within the catchment is groundwater scarcity in the South Pennar River Basin, particularly in Malur and surrounding taluks.


The catchment is classified as an over-exploited groundwater zone, where abstraction consistently exceeds natural recharge. This challenge is shared by industrial users, agricultural communities, tanker water suppliers, and local authorities, all of whom depend on the same hard-rock aquifer system for drinking water, irrigation, and livelihoods.

Key contributing factors include:

- i. Depleting groundwater levels due to prolonged over-extraction
- ii. High agricultural water demand, especially during dry seasons
- iii. Frequent drought conditions and erratic rainfall patterns
- iv. Increasing drinking water demand from growing rural and peri-urban populations
- v. Breakdown of traditional tank systems and limited surface water availability

Comment The primary shared water challenge affecting the site and other stakeholders within the catchment is groundwater scarcity in the South Pennar River Basin, particularly in Malur and surrounding taluks.

0.0.1 Water Source & Discharge Locations

0.01 *Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.* 
Yes

Comment During the audit, the following water source and water-related infrastructure locations were visited:

- i. On-site borewells located within the plant premises
- ii. Raw water collection and storage tanks
- iii. Water Treatment Plant (WTP)
- iv. Effluent Treatment Plant (ETP)
- v. Rainwater harvesting pond and stormwater management structures

The site operates on a Zero Liquid Discharge (ZLD) basis; therefore, no wastewater or stormwater discharge points outside the site boundary exist. Treated wastewater is fully reused for gardening and toilet flushing within the site and the adjacent ITC warehouse. Accordingly, there are no off-site discharge locations to be visited.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



Yes

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Comment The physical scope of the site has been mapped considering the regulatory landscape and the zone of stakeholder interests, and includes the following elements:

Site Boundaries:

The site boundary has been clearly demarcated and mapped, including all operational areas, utilities, water-related infrastructure, and associated facilities within the premises.

Water-Related Infrastructure:

All water-related infrastructure owned and managed by the site has been mapped, including the internal piping network, raw water storage tanks, water treatment plant (WTP), reverse osmosis (RO) system, boilers, cooling systems, effluent treatment plant (ETP), treated water storage tanks, rainwater harvesting structures, stormwater drains, and fire water systems.

Water Sources Owned or Managed by the Site:

Water sources mapped include on-site borewells located within the premises. These sources abstract groundwater from the local aquifer system within the South Pennar River Basin.

Water Service Providers:

Where applicable, external water suppliers have been identified and mapped, including the locations of their borewells within the same catchment. The ultimate water source for these suppliers is groundwater from the South Pennar River Basin.

Discharge Points and Wastewater Service Providers:

The site operates on a Zero Liquid Discharge (ZLD) basis. There are no wastewater discharge points outside the site boundary. All process effluent and domestic wastewater are treated in the on-site ETP and reused for gardening and toilet flushing within the site and the adjacent warehouse. Consequently, there is no ultimate receiving surface water body.

Catchment(s) Affected and Relied Upon:

The site is located within the South Pennar River Basin from a surface drainage perspective. However, the site's only water source is groundwater abstraction; therefore, the site has identified and assessed its groundwater catchment/aquifer system as the basis of operational water dependency.

According to detailed hydrogeological investigations conducted by Geovale Services Pvt. Ltd., the site relies on a hard rock aquifer system characteristic of the Malur region. This groundwater system is hydraulically disconnected from perennial surface river flows and is recharged primarily through local rainfall, infiltration, and engineered recharge structures. The extent and boundary of the groundwater catchment have been defined using hydrogeological and scientific criteria. On this basis, the Geovale study defines a Malur Study Area of approximately 100 km² (10 km × 10 km). This area is not a simple radius, but a scientifically justified hydrogeological assessment area that captures:

- Recharge and discharge zones influencing the site's abstraction wells;
- Structural controls (fractures, lineaments, and lithology) governing groundwater movement; and
- Areas where ITC-supported interventions demonstrably influence groundwater levels and availability.

Refer Page 6-8 of ITC_Malur-AWS_certification_Manual-Step_1



1.2

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

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1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - <i>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> - <i>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> - <i>Provide evidence of stakeholder consultation on water-related interests and challenges;</i> - <i>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> - <i>Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	 Obs.
Comment	<p>Based on the information submitted by the site, stakeholders who could reasonably be considered vulnerable groups, women, and local community representatives have in fact been identified. These include, for example, Gram Panchayat representatives, Tank/Water User Groups, village and farming communities, the Women and Child Welfare Department, and local NGOs working with rural and community-based groups.</p> <p>However, the stakeholder list does not explicitly categorize or label these stakeholders under the specific categories required by the indicator. It is therefore recommended that the site clearly classify stakeholders in line with the AWS categories (e.g., vulnerable groups, women, minority groups, and Indigenous peoples, where applicable) to improve clarity and demonstrate full conformity with the indicator requirements.</p>	
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Yes

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Comment The site has identified the current and potential degree of influence between itself and relevant stakeholders within the catchment, considering the site’s ultimate water source (groundwater within the South Pennar River Basin) and its ultimate receiving water body for wastewater (not applicable, as the site operates on a Zero Liquid Discharge basis).

Stakeholder influence has been assessed using the site’s Stakeholder Identification and Engagement Procedure, which evaluates:

- i. Level of interest in water-related issues
- ii. Level of influence of stakeholders on the site
- iii. Level of influence of the site on stakeholders

Based on this assessment:

High mutual influence stakeholders include Gram Panchayats, Water User Groups, farming communities, and key government departments, as water availability and groundwater sustainability directly affect both the site’s operations and community livelihoods.

Regulatory stakeholders such as the State Groundwater Authority and State Pollution Control Board have high influence on the site through permitting, abstraction limits, and compliance requirements, while the site’s influence on them is primarily through compliance and data sharing.

Water suppliers and service providers have moderate influence on the site due to dependency during periods of groundwater stress, while the site influences them through contractual requirements, water quality standards, and stewardship expectations. Community stakeholders, including village residents and schools, are influenced by the site through water stewardship initiatives, awareness programs, and WASH interventions, while their influence on the site is expressed through local water availability concerns and social license to operate.

The analysis of influence has been carried out within the defined catchment boundary and considers shared reliance on groundwater resources. Outcomes from this assessment are used to prioritize stakeholder engagement, identify shared water challenges, and design collective actions aimed at improving long-term water security in the catchment.

See Step 1 PDF for Evidence

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.*


Obs.

Comment The site has prepared an On-Site Water Emergency Response Plan (OSWEP) and listed key water-related emergency scenarios, including (i) water contamination, (ii) water scarcity due to groundwater depletion, (iii) interruption/non-availability of supply from the authorized water supplier, (iv) wastewater overflow, and (v) climatic events (droughts/floods). However, the OSWEP annexures (Annexures 15–19) do not clearly set out the corresponding response arrangements for the identified scenarios (ii) and (iii). While the scenarios are identified, the plan lacks sufficiently detailed response actions, assigned roles/responsibilities, and mitigation measures. As a result, the OSWEP does not comprehensively address identified water-related emergency scenarios as required under the AWS Standard.

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


No

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Comment The site has prepared a water balance; however, in several sections the balance does not identify intermediate losses and storage between inflow and outflow, as required under the AWS indicator. For example, in the Chemical Preparation area, Domestic Canteen, Plant (Domestic), Noodle Line-1, Noodle Line-2, Noodle Line-3, Kneader, Pasta, and S/B sections, only total inflow and final outflow have been reported. Water losses, evaporation, storage, or water embedded in product have not been identified. Consequently, the site water balance mapping remains incomplete and does not fully demonstrate traceability of water use across these processes in line with AWS Standard requirements.

Finding No: TNR-022468

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.* 🔍
Obs.

Comment The site has prepared a water balance and quantified the annual variance in water usage rates; however, the water balance does not identify or quantify losses or storage between inflows and outflows. As a result, intermediate water uses such as losses, evaporation, storage, or water embedded in product are not clearly accounted for. Consequently, the indicator requirement is not fully met, as the site has not demonstrated a complete and transparent water balance in accordance with the AWS Standard.

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

Comment The site is a Zero Liquid Discharge (ZLD) unit, and no effluent is discharged outside the plant premises into any receiving water bodies. A detailed water analysis plan has been provided on page no. 25 of the AWS Manual Step-1. Effluent samples are analyzed regularly through in-house laboratory facilities as well as Government-approved external laboratories. The testing reports were reviewed during the audit and have been attached as supporting evidence.

Based on the review and site-level assessment, it is concluded that all parameters of the treated effluent are well within the prescribed Indian Government standards.

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

Comment Potential sources of pollution at the site have been identified and mapped, including all chemicals used or stored on-site. These include fuel storage areas (HSD/FO), WTP and ETP chemical storage and treatment units, vegetable oil storage, transformer and DG oil handling areas, lubrication and hydraulic oil storage, and hazardous waste storage areas.

All such areas are provided with secondary containment measures such as bund walls, dyke walls, spill containment trays, and impervious flooring. The identified sources are documented in the Aspect-Impact Register, and preventive controls and inspection procedures are in place to minimize risks to soil, groundwater, and stormwater systems.

See Step 1 PDF for Evidence.

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

Comment The site's water infrastructure does not qualify as an IWRA unless it demonstrates a shared value (ecological, cultural, or social) beyond the site boundary and/or is publicly available. Accordingly, the RWH pond, which supports groundwater recharge, can be considered an IWRA due to its potential shared value. However, the on-site borewell should be treated as regular site infrastructure rather than IWRA.

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- 1.3.7** *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.* ✔
Yes
- Comment The site has identified and tracks annual water-related costs, including expenditure on raw water procurement (groundwater and tanker water), operation and maintenance of water treatment and wastewater treatment systems, energy consumption for water and wastewater management, monitoring and compliance activities, and investments in rainwater harvesting and water stewardship initiatives.
- While the site does not generate direct revenues from water use, it creates measurable water-related value, including:
- Environmental value through reduced freshwater abstraction, Zero Liquid Discharge operation, wastewater reuse, and groundwater recharge initiatives.
- Social value through improved water security in the surrounding catchment via community water conservation, tank desiltation, and awareness programmes.
- Economic value through improved water-use efficiency, reduced dependency on external tanker water, and lower long-term water-related operational risks.
- These costs and values are reviewed annually and are used to inform the evaluation and prioritisation of actions under the Water Stewardship Plan in accordance with Clause 4.1.2.
- See Step 1 PDF for Evidence
- 1.3.8** *Levels of access and adequacy of WASH at the site shall be identified.* ✔
Yes
- Comment The site has mapped all drinking water and toilet facilities. A table has been prepared listing the number and locations of drinking water fountains available to staff. Similarly, handwash stations have been identified and mapped across the site. Access to drinking water and sanitation facilities has been assessed and found to be in compliance with the requirements of the Factories Act, 1948 (Section 18), and the Karnataka Factories Rules, 1969.
- See Step 1 PDF for Evidence on Page-
- 1.4** *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*
- 1.4.1** *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* ✔
Yes
- Comment The primary inputs used in the production of noodles include maida flour, palmolein oil, corrugated boxes, and laminates. Among these, maida flour is the major raw material in the noodle manufacturing process. None of the suppliers of these primary inputs are located within the site's catchment area.
- 1.4.2** *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* ✔
Yes


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Comment The site has identified the embedded water use of outsourced services. Outsourced services at the site include canteen services, housekeeping, security, and utilities maintenance.

None of these outsourced services originate within the site’s catchment area. Therefore, the embedded water use within the catchment is not applicable and has not been quantified. Where relevant, water use associated with these services is limited to minor cleaning and domestic activities and does not pose a significant water risk to the catchment.

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

Comment The site has quantified the embedded water use of its primary inputs in their respective catchments of origin using secondary data sources and publicly available water footprint studies. Key primary inputs assessed include maida flour, palmolein oil, corrugated boxes, and laminates.

The quantification considers:


- Quantity of each primary input procured,
- Average water footprint per unit of material at the place of origin, and
- Water stress status of the source catchments.

The assessment indicates that maida flour contributes the highest embedded water use, as it is derived from agricultural raw material with comparatively high water demand. The embedded water use of primary inputs originating from high water-stressed regions has been identified and documented.

These findings are used to inform supplier engagement, risk prioritisation, and indirect water stewardship actions under the site’s Water Stewardship Plan.

See Step 1 PDF for Evidence.

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

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Comment Relevant water governance initiatives within the catchment have been identified to inform opportunities for collective water stewardship action. These include catchment-level plans, public policies, and government-led programmes implemented by key agencies such as the Karnataka Ground Water Authority (KGWA), Department of Watershed Development, Departments of Agriculture and Horticulture, Rural Drinking Water and Sanitation Department (RDWSD), and local Panchayati Raj Institutions.

Key initiatives include groundwater regulation and permitting, integrated watershed development programmes, micro-irrigation and water-use efficiency schemes, tank and water body restoration, and WASH programmes for rural communities, schools, and Anganwadis. The site also aligns with long-term basin-level planning through the South Pennar River Basin study.

These initiatives and associated goals—such as groundwater sustainability, improved water-use efficiency, drought resilience, and equitable access to drinking water and sanitation—are used by the site to identify and prioritize collective action opportunities with government agencies, NGOs, Water User Groups, and local communities.

See Step 1 PDF for Evidence

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

Comment The site has identified all applicable water-related legal and regulatory requirements relevant to its operations and the catchment. Key applicable regulations include the Water (Prevention and Control of Pollution) Act, 1974, the Water Cess Act (as amended), the Karnataka Ground Water (Regulation and Control of Development and Management) Act, the Factories Act, 1948, and the Karnataka Factories Rules, 1969.

The site holds valid consents and approvals from the Karnataka State Pollution Control Board (KSPCB) and complies with conditions related to water abstraction, wastewater treatment, and Zero Liquid Discharge operation. Borewells are registered, and abstraction is carried out in accordance with NOCs issued by the Karnataka Ground Water Authority (KGWA), including compliance with withdrawal limits, monitoring requirements, and restoration charges.

At the catchment level, no legally defined or stakeholder-verified customary water rights specific to the site have been identified. Drinking water and domestic water supply to communities are the responsibility of the State Government and local bodies, and the site does not infringe upon community water rights.

See Step 1 PDF for Evidence

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

Audit Number: AO-001884

Comment The catchment water balance and level of scarcity have been quantified using secondary data from CGWB reports and catchment-level water budgeting studies. The Malur–Hoskote catchment is classified as an over-exploited groundwater zone, with an average stage of groundwater development of approximately 182%, indicating abstraction significantly exceeds recharge.

A baseline water balance assessment (2019) for the priority catchment (~16,100 ha) showed:

- Net water availability: 1,664 Ha-m
- Annual water demand: 3,196 Ha-m
- Water deficit: -1,532 Ha-m

A midline assessment (2025) indicated improvement due to watershed and demand-side interventions:

- Net water availability: 1,697 Ha-m
- Annual water demand: 2,870 Ha-m
- Water deficit: -1,173 Ha-m

Seasonal variability is significant, with peak water stress during pre-monsoon and summer months and partial recharge during the monsoon season. These quantified results confirm chronic water scarcity in the catchment and are used to prioritize collective water stewardship actions.

See Step 1 PDF for Evidence

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.*


Yes

Comment The water quality status of the catchment has been identified and quantified using data from CGWB reports, hydrogeological studies, and site-level monitoring. The assessment covers physical and chemical parameters of groundwater, which is the primary water source in the catchment. Biological water quality data are not applicable, as there are no surface water bodies used for drinking purposes in the catchment.

Groundwater quality in the catchment is characterized by moderate to high TDS and hardness, typical of hard rock aquifer systems. Seasonal variations are observed, with relatively higher concentrations of TDS and hardness during pre-monsoon/summer periods and comparatively lower values during the post-monsoon season due to recharge.

The key water quality challenge identified is the gradual deterioration of groundwater quality associated with over-extraction and limited recharge. Annual and seasonal high and low variations of key parameters such as pH, TDS, and hardness have been identified and documented. These findings are used to inform prioritization of groundwater protection, recharge, and pollution prevention interventions at the catchment level.

Water quality trends have been assessed through a comparative analysis of test results for FY 2024–25 and FY 2025–26, as presented on page 55 of the AWS documentation.

See Step 1 PDF for Evidence.

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 Important Water-Related Areas (IWRAs) within the catchment have been identified and mapped, and their status has been assessed using scientific information and stakeholder engagement. The identified IWRAs include traditional irrigation tanks, lakes, check dams, recharge structures, biodiversity conservation plots, and groundwater recharge zones within the priority and extended catchment areas.

The status assessment of IWRAs has been carried out using a standardized condition rating scale (0–5) based on physical condition, functionality, and risk of degradation. The assessment indicates that several tanks and recharge structures are degraded or partially functional due to sedimentation, encroachment, and reduced inflows, posing a threat to groundwater recharge, drinking water security, and local livelihoods.

Stakeholder consultations were conducted with Gram Panchayats, Water User Groups (WUGs/TUGs), farmers, and line departments to validate the identification, condition, and prioritization of IWRAs. These findings are documented and are used to prioritize restoration, protection, and collective action interventions under the site’s Water Stewardship Plan.

See Step 1 PDF for Evidence.

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

Comment The site is not reliant on any public infrastructure for water supply or effluent disposal. Existing and planned water-related infrastructure within the catchment has been identified, and its condition and potential exposure to extreme events have been assessed using secondary data and stakeholder inputs. Existing infrastructure includes traditional irrigation tanks, lakes, check dams, recharge structures, borewells, drinking water supply schemes, and stormwater drainage systems.

The condition assessment indicates that several tanks and recharge structures are partially degraded due to sedimentation, encroachment, and reduced inflows, making them vulnerable to drought conditions and erratic rainfall patterns. Borewell-based infrastructure is exposed to groundwater depletion risk, particularly during prolonged dry periods.

Planned and ongoing infrastructure interventions under government and collective programmes include tank restoration, desiltation, construction of check dams, recharge shafts, farm ponds, and stormwater management structures, aimed at improving resilience to droughts and extreme rainfall events.

See Step 1 PDF for Evidence.

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

Comment The adequacy of WASH services within the catchment has been identified through secondary data and stakeholder consultations. The assessment indicates gaps in access to safe drinking water, sanitation, and handwashing facilities in several villages, schools, and Anganwadis, particularly during summer and drought periods. These findings are used to prioritise catchment-level WASH interventions through collective action.

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

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Comment The site actively supports and undertakes catchment-level water-related data collection through collaboration with NGOs, Gram Panchayats, Water User Groups, and technical partners. Key activities include groundwater level monitoring, water quality testing, water balance studies, IWRA assessments, and Participatory Rural Appraisals (PRAs) across both the priority and extended catchment. The resulting data is documented and used to track trends, assess impacts, and inform collective catchment-level water stewardship actions.

The site has conducted multiple catchment-level studies and monitoring initiatives over a defined timeframe, including:

- 2015–16: Assessment of Water Security Risks for Malur, including hydrological and hydrogeological studies in and around the project site.
- 2017–18: Detailed situational analysis of hydrology and hydrogeology for the Malur region.
- 2019–20: Planning and design of monitoring systems to measure the efficacy of groundwater conservation interventions in and around Malur, Karnataka.
- Core Area Perspective Plan (CAPP): Prepared in 2015–16 and updated in 2021–22.

Building on these studies, the site has identified and implemented a catchment-level water management plan. Groundwater levels are monitored at multiple locations within the catchment on a quarterly basis.

Since the previous audit, the site has further strengthened its monitoring framework by initiating catchment water quality analysis, which was not previously practiced. Water quality monitoring is now conducted during both pre-monsoon and post-monsoon periods, improving data availability and supporting more informed catchment-level decision-making.

See Step 1 PDF for Evidence

1.5.9 *Advanced Indicator* 🔍
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified. Obs.

Comment The site has one packaging supplier, Ratna Packaging, which is located in the Hosur catchment. Accordingly, the site undertook a Core Area Perspective Plan (CAPP) exercise to assess the adequacy of WASH facilities within the Hosur catchment.

However, only the Hosur catchment (associated with one of the nine primary input suppliers) has been assessed for WASH adequacy to date. To fully meet AWS requirements, additional WASH adequacy assessments are required for the remaining eight (8) primary input suppliers' catchments.

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.* 🔍
Obs.

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Comment Shared water challenges have been identified and prioritised based on site water data, catchment studies, stakeholder consultations, and Participatory Rural Appraisals. The priority challenges include: (1) depletion of groundwater levels; (2) water shortages for agriculture and drinking; (3) prolonged drought and irregular rainfall; (4) high agricultural and horticultural water demand; (5) low water efficiency; and (6) high water-guzzling crops. These challenges have been ranked considering severity, stakeholder impact, and relevance to the site, and are used to inform the Water Stewardship Plan and collective action initiatives. However, the site has not demonstrated any additional or new efforts since the previous certification cycle to identify or update shared water challenges. While it is acknowledged that groundwater depletion remains ongoing and continues to be the most urgent shared water challenge, an update is needed to reflect any changes in stakeholder perceptions regarding the other previously identified challenges, as well as the potential emergence of any new or evolving shared water challenges. It is therefore recommended that the site re-engage relevant stakeholders and consolidate the outcomes to clearly demonstrate ongoing identification and refinement of shared water challenges.

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



Yes

Comment Initiatives to address the identified shared water challenges have been identified based on catchment studies and stakeholder consultations. These include groundwater recharge and tank restoration, watershed development, demand-side water-use efficiency in agriculture, WASH improvement in schools and Anganwadis, community awareness programs, and data-driven water governance initiatives implemented in collaboration with Gram Panchayats, government departments, NGOs, and Water User Groups.

Suggested feedback from stakeholders:

- Introduction of new rainfed crop-Chiya
- Introduction of Dryland Horticulture
- Soil test-based fertiliser application
- Soil moisture indicator-based Irrigation
- New IPM & INM for Crops

See Step 1 PDF for Evidence.

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



Obs.

Comment The site has provided a forward-looking analysis describing how currently identified water challenges may evolve in the future, based on catchment studies and demand–supply projections. This analysis is useful as an outlook on the progression of existing issues.

However, Indicator 1.6.3 requires the identification and review of anticipated future water issues that may not yet be directly observable. While the site has briefly noted certain future issues—such as a recurring drought trend in Kolar District (approximately once every five years) and erratic/unusual rainfall patterns (fewer rainy days with increased rainfall intensity)—these points are presented only at a high-level and remain very brief, without sufficient assessment of anticipated impacts.

Overall, the submitted commentary primarily emphasizes projected improvements under planned scenarios and does not adequately identify or assess potential future risks, uncertainties, or emerging water-related issues—such as infrastructure deterioration, changes in demand patterns due to population growth and industrialization—along with their possible impacts.

1.6.4 *Advanced Indicator*
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.



Obs.

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Comment The site has described several water-related activities and outcomes, including Zero Liquid Discharge (ZLD) operation, watershed interventions, and proactive data collection initiatives, and has characterized these primarily as having positive social benefits. However, while ZLD operation is cited to conclude that no negative social impacts exist from effluent discharge, the site has not assessed the potential social impacts of its groundwater abstraction, including possible effects on local community water availability, domestic users, or small farmers, using data or stakeholder feedback.

As a result, the site has not adequately demonstrated a comprehensive water-focused social impact assessment, covering both potential negative and positive impacts, supported by clear methodology, evidence, and conclusions, as required by the AWS Standard.

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

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

Comment Water risks faced by the site have been identified and prioritised based on catchment studies, site water data, stakeholder inputs, and future risk trends. The key risks include groundwater scarcity due to over-exploitation, Breakdown of site water treatment plant, Breakdown of site effluent treatment plant, Water suppliers rejecting supply of water to the site, Non-compliance to conditions of water parameters of treated water, Waste water discharge from site causing water pollution, Deviating from the water quality parameters as laid down by statute for the use of water in process & wash facilities etc.

These risks have been evaluated considering likelihood, severity, timeframe, potential costs, and business impacts, including risks to production continuity, increased water procurement costs, compliance obligations, and reputational impact.

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

Comment Water-related opportunities have been identified based on site performance trends, catchment assessments, and stakeholder consultations. Key opportunities include improving on-site water-use efficiency, increasing wastewater reuse and rainwater harvesting, reducing dependency on tanker water, and strengthening groundwater recharge through catchment interventions.

Opportunities for participation include collective action with Gram Panchayats, NGOs, and government departments on watershed restoration, WASH improvement, and data-driven water governance. These opportunities have been assessed and prioritised based on potential water savings, cost reduction, risk mitigation, regulatory resilience, and reputational and business value, and are incorporated into the Water Stewardship Plan.

See Step 1 PDF for Evidence.





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

1.8.1 *Relevant catchment best practice for water governance shall be identified.* ✔
Yes

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Comment	<p>The site has identified best practices in governance through their own commissioned studies and also the government studies and initiatives. Engaging with stakeholders has extended this knowledge and understanding.</p> <p>The best practices for addressing the shared water challenges are identified from the recommendations made from the two study reports (Geovale & Urdhwam) and also from the standard manual for the Integrated Watershed Development Program (IWMP) and the Watershed Guidelines Manual.</p> <p>See Step 1 PDF for Evidence.</p>	
1.8.2	<p><i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i></p>	 Yes
Comment	<p>Relevant sectoral and catchment-level best practices for water balance have been identified based on food-processing industry benchmarks, catchment studies, and government guidelines. These include process water-use efficiency measures, adoption of water-efficient cleaning practices, Zero Liquid Discharge (ZLD) operation with maximum reuse, rainwater harvesting, and groundwater recharge through watershed structures.</p> <p>At the catchment level, best practices include demand-side management in agriculture (micro-irrigation, crop diversification), restoration of traditional tanks, construction of check dams and recharge structures, and integrated water budgeting. These practices are used to reduce total water abstraction, improve recharge, and enhance long-term water balance within the catchment.</p> <p>See Step 1 PDF for Evidence.</p>	
1.8.3	<p><i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i></p>	 Yes
Comment	<p>Relevant sectoral and catchment-level best practices for water quality have been identified based on food processing industry standards, regulatory requirements, and scientific studies. Sector best practices include regular monitoring of raw, processed, drinking, and treated wastewater as per BIS, CPCB, and KSPCB norms; adoption of Zero Liquid Discharge (ZLD); robust operation and maintenance of WTP and ETP; and preventive controls for chemical and oil handling.</p> <p>Catchment Best Practices for Water Quality</p> <p>Key catchment best practices include micro-irrigation, which reduces water losses and fertilizer runoff; catchment treatment and water harvesting structures, which reduce runoff velocity, soil erosion, and turbidity; solid waste management, preventing drain choking and rainwater contamination; Integrated Pest and Nutrient Management (IPM/INM), lowering chemical pesticide and fertilizer leaching; and organic mulching, which reduces evaporation, improves soil moisture retention, and enhances soil health—collectively contributing to improved surface and groundwater quality.</p> <p>See Step 1 PDF for Evidence.</p>	
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p>	 Yes
Comment	<p>Relevant catchment best practices for the maintenance of Important Water-Related Areas (IWRAs) have been identified based on watershed management guidelines and stakeholder experience. These include regular desilting and protection of tanks and water harvesting structures, prevention of encroachment, maintaining vegetative buffer zones, periodic inspection and upkeep of recharge structures, and community-based monitoring through Gram Panchayats and Water User Groups.</p> <p>See Step 1 PDF for Evidence.</p>	
1.8.5	<p><i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i></p>	 Yes

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Comment Relevant sectoral and catchment-level best practices for equitable and adequate WASH services have been identified based on national guidelines, public health standards, and community programmes. These include ensuring universal access to safe drinking water, gender-segregated and accessible sanitation facilities, functional handwashing stations with soap, regular operation and maintenance of WASH infrastructure, and hygiene awareness programmes.

At the catchment level, best practices include WASH improvements in villages, schools, and Anganwadis through government schemes and community participation, with a focus on equity, inclusiveness, and reliability of services, particularly during water-scarce periods.

See Step 1 PDF for Evidence.

Audit Number: AO-001884

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> <i>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> <i>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> <i>- That the site's stakeholders will be engaged in an open and transparent way</i> <i>- That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	<p>A signed and publicly disclosed site water stewardship commitment statement has been identified.</p> <p>The statement is signed by the Site Head, who is the senior-most authority responsible for water at the site.</p> <p>The site water stewardship commitment statement is prominently displayed at the main gate of the factory, where it is freely accessible to all. In addition, the statement is displayed at various strategic locations across different departments within the site, ensuring visibility and access for all employees and visitors. Apart from on-site display, the water stewardship commitment is also shared with stakeholders during meetings, ensuring awareness and transparency beyond the site premises.</p> <p>To further strengthen effective communication with the local community, it is recommended that the statement also be displayed in the local language.</p>	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i></p>	 Yes
Comment	<p>A signed and publicly disclosed organizational water stewardship commitment statement has been identified. The statement is signed by the organization's senior-most executive / governance body and explicitly covers all requirements specified under Indicator 2.1.1, including commitment to implementation of the AWS Standard, disclosure of progress, alignment with catchment sustainability plans, transparent stakeholder engagement, and allocation of adequate resources.</p>	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> <i>- Identification of responsible persons/positions within facility organizational structure</i> <i>- Process for submissions to regulatory agencies.</i> 	 No

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Alliance for Water Stewardship (AWS)

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Comment The company has a Global Compliance Monitoring System (GCMS) in place; however, the compliance conditions stipulated under the Groundwater NOC—specifically the monthly submission of groundwater abstraction data to KGWA and the conduct and submission of pre-monsoon and post-monsoon groundwater quality analysis—are not mapped or monitored within the GCMS. This gap was previously noted as an observation during the Surveillance-2 audit. As the issue remains unaddressed, it is now raised as a Non-Conformance. Consequently, the site has not fully demonstrated systematic monitoring and management of all applicable groundwater regulatory compliance requirements in accordance with the AWS Standard.

Finding No: TNR-022501

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

Comment A documented Water Stewardship Strategy has been identified, which defines the organization's vision, mission, and goals towards good water stewardship in line with the AWS Standard.

Vision: Water to All for Today and Tomorrow

Mission: To achieve water security for all stakeholders by ensuring a positive water balance, strengthening water governance at the site and catchment level, and adopting sustainable and water-efficient manufacturing practices following the reduce, reuse, recycle, and reserve principles.

Goals: Long-term goals include reduction in specific water consumption, creation of rainwater harvesting potential exceeding net water consumption, maintenance of good water quality, protection of Important Water-Related Areas, and equitable and adequate WASH access for stakeholders.

See Step 2 PDF for Evidence

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


Yes

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Comment A documented Water Stewardship Plan has been identified for both site-level and catchment-level actions, which defines clear targets and, for each target, specifies:

Measurement and monitoring mechanisms, including KPIs such as Specific Water Consumption, treated water quality parameters, IWRA condition checks, and quarterly/annual progress tracking through master lists, audits, and external verification;

Defined actions and interventions to achieve and maintain targets, covering water-use efficiency, wastewater reuse, rainwater harvesting, groundwater recharge, watershed development, sustainable agriculture, IWRA maintenance, and WASH improvement;

Planned timelines and milestone dates extending up to 2030, with annual and multi-year targets;


Allocated financial budgets, clearly documented for site-level interventions and catchment programmes through annual plans and NGO agreements;

Assigned roles and responsibilities, including Engineering, EHS, Operations Managers at site level and Program Managers for catchment interventions; and

Linkages between targets, shared water challenges, and AWS outcomes, demonstrating alignment with Water Balance, Water Quality, IWRA, Water Governance, and WASH outcomes.


The Water Stewardship Plan is formally documented, communicated to internal stakeholders, reviewed periodically, and used as the primary tool for implementation and tracking of water stewardship performance

See Step 2 PDF for Evidence

2.3.3 *Advanced Indicator* 
Yes
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.

Comment The site's partnership and water stewardship activities with other sites within the same catchment have been identified and described. ITC Malur Factory, in collaboration with its neighbouring warehouse located within the same catchment, has jointly implemented a rainwater harvesting initiative to capture rooftop runoff from the warehouse, thereby reducing dependence on fresh groundwater abstraction. Further, ITD (Indian Tobacco Division) Bangalore is also working on AWS-aligned water stewardship initiatives within the South Pennar Basin, and coordination meetings have been conducted for knowledge sharing, alignment of actions, and strengthening catchment-level outcomes.

See Step 2 PDF for Evidence




2.3.4 *Advanced Indicator* 
Obs.
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.

Comment ITC Malur has conducted water stewardship interaction sessions with group companies and suppliers located in another catchment. However, no documented evidence—such as meeting agendas, minutes of meetings, attendance records, or documented outcomes and action points—was made available for review. Only photographs of the sessions were provided in ITC Malur-AWS certification Manual Step 2, Page No. 18.

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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>	 Yes
Comment	<p>Stakeholder consensus on the site's water stewardship plan has been sought and evidenced at both the site and catchment levels.</p> <p>At the site level, the submitted Minutes of Meeting (MoM) records demonstrate alignment among key decision-makers (Plant Head, Heads of Departments, EHS Manager, supervisors) on the agreed agenda and actions to reduce specific water consumption, including the target improvement from 2.30 KL/MT to 2.28 KL/MT.</p> <p>At the catchment level, stakeholder consensus has been obtained and documented through engagements with Tank User Groups, farmer communities, and Anganwadi representatives. Stakeholders expressed agreement on key outcomes/targets, including: (i) improved water availability through tank and check dam interventions; (ii) reduced agricultural water requirements; (iii) increased agricultural income; and (iv) improved WASH conditions in schools and Anganwadi centres. During the audit, signed registers, letters, and stakeholder records were reviewed, and the consensus outcomes are also documented in the AWS Manual submitted as supporting evidence.</p>	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes
Comment	<p>A documented plan to mitigate and adapt to identified water risks has been identified, developed in coordination with relevant public-sector agencies, local institutions, and infrastructure stakeholders. The plan addresses key risks such as groundwater scarcity, seasonal water stress, declining recharge, and climate variability.</p> <p>Mitigation and adaptation measures include groundwater recharge and watershed interventions, rainwater harvesting, demand-side water-use efficiency, WASH improvements, and data-driven water governance initiatives, implemented in collaboration with Gram Panchayats, line departments, NGOs, and water user groups. The plan is aligned with government programmes and catchment sustainability plans and is used to guide site- and catchment-level actions for long-term water security.</p> <p>See Step 2 PDF for Evidence</p>	
2.4.2	<i>Advanced Indicator</i> <i>A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes

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Comment A documented plan to mitigate and adapt to water risks associated with climate change projections has been identified, developed in coordination with relevant public-sector and infrastructure agencies. Climate risk identification and action planning are informed by state-level climate change projections and drought assessments issued by the Government of Karnataka and the Karnataka State Natural Disaster Monitoring Centre (KSNDMC).

The plan addresses anticipated climate-related risks such as declining groundwater availability, increased frequency of droughts, erratic rainfall patterns, and prolonged dry spells. Mitigation and adaptation actions include watershed development and recharge interventions, creation and renovation of water harvesting structures, hydrogeological and future water projection studies (Geovale and Urdhvam studies), and promotion of climate-resilient and climate-smart agriculture practices in collaboration with the Watershed Development Department, Agriculture and Horticulture Departments, Gram Panchayats, and Water User Groups.

See Step 2 PDF for Evidence

Audit Number: AO-001884

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i> ✔ Yes
Comment	<p>Evidence that the site has supported good catchment governance has been identified. The site has initiated and supported hydrogeological studies, water balance assessments, CAPP studies, and community need assessments to strengthen data-driven decision-making in the catchment. It has partnered with technical, implementation, and government stakeholders (including MYRADA, WASHi, Geovale, Agriculture, Horticulture and Forest Departments) and promoted community institutions such as Tank User Groups, SDMCs, Mother Committees, and Child Cabinets.</p> <p>The site has facilitated capacity building, regular meetings, participatory planning, and stakeholder consultations, enabling collective planning, implementation, and monitoring of water-related interventions. These actions demonstrate active support to inclusive, participatory, and transparent catchment governance.</p> <p>ITC Manual Step 3 PDF as evidence.</p>
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i> ✔ Yes
Comment	<p>Measures to respect the water rights of others have been implemented. The site operates with regulated groundwater abstraction, valid statutory permissions, and a Zero Liquid Discharge (ZLD) system, ensuring that its operations do not adversely affect community access to water resources.</p> <p>There are no Indigenous peoples' customary water rights identified within the site or immediate catchment. Nevertheless, the site ensures respect for community water rights by avoiding off-site discharge, supporting groundwater recharge and watershed interventions, strengthening drinking water and WASH infrastructure in villages, and engaging transparently with Gram Panchayats and community institutions. These measures collectively ensure that the site's operations do not infringe upon the water rights of others.</p> <p>ITC Manual Step 3 PDF as evidence.</p>
3.1.3	<i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i> ✔ Yes
Comment	<p>Evidence of improved water governance capacity, including stakeholder engagement activities and local WASH governance support, has been identified from the baseline year 2018–19, with measurable progress between 2024–25 and 2025–26.</p>
3.1.4	<i>Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i> ✔ Yes

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Comment Evidence from a representative range of stakeholders demonstrates consensus that the site is positively contributing to good water governance within the catchment. Feedback obtained through stakeholder consultations, Participatory Rural Appraisals (PRAs), Gram Sabha meetings, NGO partner reports, and government interactions indicates recognition of the site's role in data-driven planning, transparent engagement, and support to community-based water institutions.

Stakeholders including Gram Panchayat representatives, Water User Groups, farmers, schools, Anganwadis, NGOs, and line departments have acknowledged the site's contribution towards strengthening governance mechanisms, improving coordination, and enabling collective decision-making for sustainable water management in the catchment. This stakeholder feedback is documented and reviewed as part of the site's water stewardship programme.

See ITC Manual Step 3 PDF as evidence

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

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



Yes

Comment All applicable legal and regulatory requirements related to water have been fully complied with, and the site is operating in accordance with the prevailing statutory provisions.

While a gap in the compliance management system was identified under Indicator 2.2.1 (i.e., certain KGWA Groundwater NOC conditions are not fully mapped/monitored within GCMS), this system gap has not resulted in actual regulatory non-compliance, and the required submissions/requirements are being met in practice.

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



Yes

Comment At the site level, water-related rights are defined and respected through compliance with the Karnataka Factories Rules, 1969 and IS 1172:1993, as identified under Indicator 1.3.8, ensuring adequate access to drinking water and sanitation facilities. At the catchment level, the site has well-documented evidence demonstrating respect for the water rights of others, through regulated abstraction, Zero Liquid Discharge operations, groundwater recharge initiatives, and transparent engagement with local communities and institutions.

See ITC Manual Step 3 PDF as evidence.

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

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



Yes

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Comment The status of progress towards meeting water balance targets set in the Water Stewardship Plan has been identified and documented. The site has tracked performance against targets for specific water consumption (2.28 KL/Ton for 2025-26), rainwater harvesting, groundwater recharge, and catchment-level supply- and demand-side interventions.

Progress shows that while specific water consumption targets were partially impacted in FY 2024–25 due to production mix and increased cleaning requirements, the additional water demand was offset through rainwater harvesting, with approximately 9,250 KL of water met through harvested rainwater, thereby reducing freshwater abstraction. At the catchment level, cumulative achievements against water balance targets demonstrate exceedance of recharge and storage creation goals, with 574,125 cum of additional storage created against a target of 332,000 cum, indicating overall positive progress towards sustainable water balance.

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 As the site has started using harvested rainwater in process operations, Specific Water Consumption (SWC) has been analysed excluding rainwater and considering only freshwater sourced from suppliers. This provides a clearer assessment of actual freshwater dependency.

Based on this analysis, Specific Freshwater Consumption has shown a consistent reduction, decreasing from 2.08 KL/ton in FY 2023–24 to 2.01 KL/ton in FY 2024–25, and further to 1.87 KL/ton in FY 2025–26 (H1).

In addition, total volumetric freshwater withdrawal has reduced from 56,818 KL in FY 2023–24 to 52,313 KL in FY 2024–25, with 29,618 KL withdrawn up to September FY 2025–26.

Accordingly, due to the rainwater harvesting initiative, the site has achieved an actual reduction of approximately 8% in freshwater withdrawal, demonstrating effective implementation of annual water-use efficiency targets in a water-scarce catchment.

See ITC Manual Step 3 PDF as evidence.

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 Legally binding documentation for the re-allocation of water to social, cultural, or environmental needs is not applicable to the site. The site does not hold any water entitlements that are subject to formal re-allocation under law.

However, the site contributes to social and environmental water needs through voluntary and collective actions, including groundwater recharge, watershed development, tank restoration, and WASH interventions within the catchment, implemented in coordination with local institutions and government programmes. These actions support catchment water security without requiring legal re-allocation mechanisms.

3.3.4 *Voluntary Advanced Indicator
The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.* ✔
Yes

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Comment The site does not directly supply water to nearby village communities or for specific social or cultural uses. However, as a voluntary water stewardship action, the site shares treated wastewater with a nearby warehouse facility for gardening purposes, thereby reducing the warehouse's dependence on fresh groundwater.

The total volume of treated water voluntarily re-allocated is as follows:

FY 2024–25: 6,462 KL

FY 2025–26 (till September): 1,691 KL

This voluntary reuse of treated water represents a quantified re-allocation of site water savings, contributing to environmental sustainability and reduced freshwater abstraction at the local level. The physical transfer of treated water is supported by a dedicated pipeline from the site to the warehouse, as evidenced.

Approximately 9,250 KL of freshwater has been voluntarily re-allocated through substitution with harvested rainwater, resulting in reduced groundwater abstraction. This voluntary water saving supports environmental sustainability and community water availability at the catchment level.

See ITC Manual Step 3 PDF as evidence.

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.



Comment The status of progress towards meeting water quality targets defined in the Water Stewardship Plan has been identified and documented. Regular monitoring of treated wastewater indicates that key parameters including pH, Total Dissolved Solids (TDS), Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), and oil & grease are consistently within applicable regulatory limits and internal targets.

See ITC Manual Step 3 PDF as evidence

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.



Comment Where water quality is identified as a shared water challenge, the site has demonstrated improvement towards best practice in effluent management through Zero Liquid Discharge (ZLD) operations. The effluent treatment system is regularly optimized and monitored, ensuring treated wastewater quality (pH, BOD, COD, TSS, oil & grease) consistently meets applicable regulatory and internal targets.

The site has implemented the following initiatives to improve water quality:

- i. A multi-grade sand filter has been installed at the inlet of the rainwater harvesting storage tank to remove suspended solids and improve physical water quality.
- ii. An auto-chlorination system has been installed at the outlet of the rainwater storage tank to reduce microbial load.
- iii. Manual chlorination has been upgraded to an auto-chlorination system for process water, ensuring consistent and controlled disinfection.

The site is a zero discharge site, all water is re-used. The site treats to better than the local state standard. Best practice is reuse and not discharge. Continual improvement is not necessary in this case.

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Audit Number: AO-001884

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

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


Yes

Comment The practices defined in the Water Stewardship Plan to maintain and enhance the site's IWRAs have been effectively implemented. These practices include regular upkeep and maintenance of rainwater harvesting structures, stormwater management systems, and groundwater recharge features within the site premises.

The site has also identified relevant catchment IWRAs and implemented interventions in line with the Water Stewardship Plan.

Interventions include auto-chlorination systems and multi-grade sand filters to improve water quality, and tank/check dam renovation, desiltation, and new/rehabilitated structures to increase storage, reduce runoff, and support groundwater recharge. Additional measures include farm ponds for critical irrigation, open well renovation and recharge units to enhance shallow aquifer use and reduce dependency on deeper aquifers, and recharge zones supported through recharge pits, well recharge structures, and managed aquifer recharge works.

Soil and water conservation actions on common lands and interventions in shallow aquifer zones further contribute to improved recharge, ecosystem services, and reduced pressure on deeper groundwater resources.

See ITC Manual Step 3 PDF as evidence.

3.5.2 *Advanced Indicator
Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified.
Restored areas may be outside of the site, but within the catchment.*


Yes

Comment Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas (IWRAs) from the site-selected baseline year has been identified. Restoration activities have been undertaken outside the site boundary but within the catchment, focusing on traditional tanks, water harvesting structures, and recharge systems that were previously degraded due to siltation and reduced inflows.

The restored IWRAs are now functioning effectively, contributing to improved groundwater recharge, enhanced water availability, and ecosystem benefits for local communities. Where applicable, community use and local cultural values associated with these water bodies have been respected and strengthened through stakeholder engagement and participatory implementation. Evidence of restoration and outcomes is documented through completion reports, photographs, and stakeholder validation.

The site has mapped the number and location of the IWRAs, whose status they have improved over the recent years. Maps, tables, and pictures are available in ITC Manual Step 3 PDF. The site has excellent performance in this area.

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


Yes

Audit Number: AO-001884

Comment	<p>Evidence from a representative range of stakeholders demonstrates consensus that the site is positively contributing to the healthy status of Important Water-Related Areas (IWRAs) within the catchment. Feedback from Gram Panchayats, Tank/User Groups, farmers, NGOs, and line departments obtained through stakeholder consultations, PRA exercises, meeting records, and field visits confirms improvements in the functionality and condition of restored tanks and recharge structures.</p> <p>Stakeholders have acknowledged the site's role in restoration, maintenance, and protection of IWRAs, leading to enhanced groundwater recharge, improved water availability, and environmental benefits. This consensus is documented and reviewed as part of the site's water stewardship programme.</p>
3.6	<p><i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i></p>
3.6.1	<p><i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i></p>
Comment	<p>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all onsite workers has been identified and quantified. The site provides treated potable drinking water through adequately distributed water points, gender-segregated and well-maintained toilet facilities, and handwashing stations with soap across production, utility, and administrative areas.</p> <p>Access and adequacy are assessed against statutory requirements under the Factories Act, 1948, Karnataka Factories Rules, 1969, and IS 1172:1993. Periodic inspections, housekeeping records, and monitoring data confirm 100% coverage for employees and contract workers, with no identified gaps.</p> <p>These have already been identified in and quantified in Indicator 1.3.8 and 3.2.2. See ITC Manual Step 3 PDF</p>
3.6.2	<p><i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i></p>
Comment	<p>Evidence confirms that the site is not impinging on the human right to safe water and sanitation of surrounding communities through its operations. The site operates with regulated groundwater abstraction, valid statutory permissions, and a Zero Liquid Discharge (ZLD) system, ensuring no off-site discharge or contamination of community water sources.</p> <p>There are no identified Indigenous peoples' customary or traditional water access rights within the site or immediate catchment. Local community water access rights are respected through non-interference with public water sources, support to groundwater recharge and watershed interventions, and WASH improvement programmes implemented in coordination with Gram Panchayats and local institutions.</p> <p>Evidences presented for 2.3.2, 2.3.5, 2.4.1, 2.4.2, 3.1.1-3.1.4, 3.5.1-3 should justify this. No adverse impacts or grievances related to water or sanitation have been reported. Accordingly, no remedial actions have been required, and existing measures are considered effective in safeguarding community water and sanitation rights.</p> <p>See ITC Manual Step 3 PDF</p>
3.6.3	<p><i>Advanced Indicator</i> <i>A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i></p>

Yes

Yes

Yes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001884

Comment A list of actions taken by the site to support access to safe drinking water, adequate sanitation, and hygiene awareness for stakeholders within the catchment has been identified. These actions include installation and restoration of drinking water infrastructure in villages, schools, and Anganwadis; construction and improvement of sanitation facilities; and provision of handwashing stations in coordination with Gram Panchayats and line departments.

In addition, the site has supported hygiene awareness programmes, WASH education campaigns, and community engagement activities through NGO partners, focusing on safe water handling, sanitation practices, and personal hygiene. These actions are documented and contribute to improved WASH outcomes and community well-being within the catchment.

The site has a well developed programme of working with schools to improve WASH situation throughout the catchment. See attached document.


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

Comment Evidence of efforts taken by the site, in coordination with relevant public-sector agencies, to share information and advocate for improvements in access to safe drinking water and sanitation has been identified. The site has actively engaged with Gram Panchayats, Rural Drinking Water and Sanitation Department, Education Department, Women & Child Development Department, and NGOs to share WASH assessment findings, data, and best practices.

These efforts include joint planning meetings, awareness programmes, and alignment with government WASH schemes, aimed at improving drinking water reliability, sanitation coverage, and hygiene practices in villages, schools, and Anganwadis. The engagement supports systemic improvements in WASH access in water-stressed areas of the catchment.


See ITC Manual Step 3 PDF

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* 
No

Comment As per ITC Malur-AWS certification Manual Step 2, Page No. 47, no documented evidence was provided to demonstrate that a target has been established for indirect water use. In the absence of defined targets and supporting justification or baseline data, the site has not adequately demonstrated setting and monitoring of indirect water use targets as required under the AWS Standard.

Finding No: TNR-022507

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* 
Obs.





Comment The site has claimed supplier engagement in the form of training and awareness sessions with the following suppliers: Mohini Corporation, ANS Paper Mills, and Swara Flour Mills.

While this claim is noted, adequate documentary evidence has not been provided to substantiate engagement with listed suppliers. Specifically, supporting records such as meeting agendas, training modules/topics, attendance sheets, or minutes of meetings were not submitted. Only photographic evidence related to one supplier was provided, which is insufficient to demonstrate engagement with all three suppliers.

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- 3.7.3** *Advanced Indicator* 
Yes
Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
- Comment Actions taken to address water-related risks and challenges associated with indirect water use outside the catchment have been documented and evaluated. The site has identified key indirect water risks linked to primary inputs, particularly agricultural raw materials such as maida, which originate outside the site's catchment.
- To address these risks, the site has undertaken supplier engagement and risk assessment using secondary data, promoted best practices for water-use efficiency, Integrated Pest and Nutrient Management (IPM/INM), and micro-irrigation through its broader sustainability programmes, and incorporated water risk considerations into procurement and supplier evaluation processes.
- The effectiveness of these actions is periodically reviewed through data updates, supplier interactions, and alignment with organizational sustainability frameworks, ensuring that indirect water risks are identified, managed, and progressively reduced.
- 3.8** *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*
- 3.8.1** *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* 
Yes
- Comment Evidence of stakeholder engagement has been identified, including documentation of meetings, consultations, workshops, PRA sessions, Gram Sabha interactions, and written communications with internal and external stakeholders. Key messages relayed covered shared water challenges, water stewardship objectives, planned and ongoing interventions, roles and responsibilities, and progress updates.
- Confirmation of receipt and participation is available through meeting minutes, attendance registers, photographs, acknowledgement emails, and signed records, demonstrating that information was effectively communicated and received by relevant stakeholders.
- ITC Manual Step 3 PDF for evidence.
- 3.9** *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*
- 3.9.1** *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* 
Yes
- Comment Actions towards achieving best practice in water governance have been implemented, in line with the Water Stewardship Plan and catchment governance frameworks. These actions include transparent stakeholder engagement, participation in catchment planning processes, data-driven decision-making through water balance and quality assessments, strengthening of community water institutions, and coordination with government agencies and NGOs.
- Regular reviews, documentation, and disclosure of progress demonstrate continuous improvement and alignment with recognized best practices in water governance at both site and catchment levels.
- ITC Manual Step 3 PDF for evidence.
- 3.9.2** *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* 
Yes

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Comment Actions towards achieving best practice for water balance have been implemented, including improvements in water-use efficiency, maximisation of rainwater harvesting, reuse of treated wastewater, and catchment-level recharge interventions. These actions have resulted in reduced freshwater abstraction and positive progress against site and catchment water balance targets, in line with the Water Stewardship

ITC Manual Step 3 PDF for evidence.

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*



Comment Actions towards achieving best practice for water quality have been implemented, including robust operation of WTP and ETP systems, Zero Liquid Discharge (ZLD), continuous monitoring of key parameters (pH, TDS, BOD, COD, TSS, oil & grease), and preventive controls for contamination. These measures ensure consistent compliance with regulatory standards and continual improvement in water quality performance.

The site recognizes that water quality challenges at the catchment level cannot be addressed by the unit alone. Accordingly, the site has focused on interventions that address key drivers of water quality degradation, particularly agricultural runoff and excessive fertilizer use. The following best practices have been promoted and implemented within the catchment:

- Micro-Irrigation: Reduces water conveyance losses and applies water directly to the root zone, resulting in 40–50% water savings. Enables fertigation, thereby reducing fertilizer runoff and contamination of surface and groundwater.
- Catchment Treatment and Water Harvesting Structures (WHSs): Construction of catchment treatment measures and WHSs reduces runoff velocity, soil erosion, and turbidity, contributing to improved water quality.
- Integrated Pest and Nutrient Management (IPM & INM) – Soil Test–Based Fertilizer Application: Promotes optimized fertilizer application based on soil health, reducing chemical fertilizer use, lowering nutrient leaching to water bodies, and reducing GHG emissions.
- Integrated Pest and Nutrient Management (IPM & INM) – Silt Application: Application of nutrient-rich silt improves soil health and crop yield, reduces dependency on chemical fertilizers, and minimizes agricultural return flows to aquifers.

These actions demonstrate the site's implementation of best practices aimed at improving catchment water quality, complementing its Zero Liquid Discharge (ZLD) operations at the site level.

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*



Comment Same as the previous indicator on IWRA. The site has a comprehensive programme for the maintenance of IWRAs on site, including maintenance of rainwater collection pond, tanks, etc. With regard to the catchment, the site also has implemented the enhancement of IWRAs (tank dams, open wells, and check dams), all of which improves access to water for the villages across the catchment.

Evidence has been provided in ITC Manual Step 3 PDF for evidence.

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*



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Comment These have already been discussed in detail in Indicators 1.8.5, 3.6.3 & 3.6.4. All activities taken up for improving WASH in the catchment, as showcased in 3.6.3 & 3.6.4, are based on best practices recommended by the Swachh Bharat Guidelines by the Ministry of Urban Development.

At the site level, actions are being taken to implement best practices to achieve targets related to WASH, such as the implementation of a robust system of housekeeping of the WASH facilities. Dedicated expert agency BVG India Ltd. has been deployed to continuously maintain the hygiene and cleanliness of the WASH facilities. All toilet facilities are cleaned every half an hour by trained professionals through defined checklists and records maintained.

ITC Manual Step 3 PDF for evidence

3.9.6 *Voluntary Advanced Indicator* ✔
Yes
Achievement of identified best practice related to targets in terms of good water governance shall be quantified.

Comment Achievement of identified best practices related to good water governance has been quantified. Since the baseline year, the site has supported 100+ stakeholder engagements (Gram Panchayats, Tank/User Groups, NGOs, line departments), facilitated catchment studies and data collection covering the priority and extended catchment, and enabled the formation/strengthening of multiple community water institutions (e.g., Tank User Groups and village committees).

These actions have resulted in regular participatory planning cycles, improved availability and use of water data for decision-making, and documented consensus among stakeholders on governance improvements—demonstrating measurable progress towards best practice in catchment water governance.

The site has presented evidence to support very good performance on this indicator. The site works consistently with all levels of government and public sector agency and water user groups in villages all for the better management of water across the catchment. See ITC Manual Step 3 PDF for evidence.

3.9.7 *Voluntary Advanced Indicator* ✔
Yes
Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.

Comment Achievement of identified best practices related to sustainable water balance has been quantified. At the site level, freshwater withdrawal has reduced by ~8% through rainwater harvesting and efficiency measures, with ~9,250 KL of freshwater substituted by harvested rainwater.

At the catchment level, 574,125 m³ of water storage/recharge potential has been created against a target of 332,000 m³, demonstrating net positive contribution towards long-term water balance and groundwater sustainability.

Evidence of all interventions is given in ITC Manual Step 3 PDF

3.9.8 *Voluntary Advanced Indicator* ✔
Yes
Achievement of identified best practices related to targets in terms of water quality shall be quantified

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Comment Achievement of identified best practices related to water quality targets has been quantified. At the site level, 100% compliance with internal and regulatory standards for treated wastewater quality has been consistently achieved, with key parameters (pH, BOD, COD, TSS, oil & grease) remaining within prescribed limits under Zero Liquid Discharge (ZLD) operations.

At the catchment level, water-quality-oriented interventions such as micro-irrigation, IPM/INM practices, soil test-based fertilizer application, silt application, and catchment treatment/WHS construction have been implemented, resulting in reduced fertilizer usage, lower agricultural runoff, and reduced turbidity, thereby contributing to measurable improvement in practices addressing non-point source pollution risks and supporting long-term catchment water quality.

ITC Manual Step 3 PDF

3.9.9 *Voluntary Advanced Indicator* 
Yes
Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.


Comment Achievement of identified best practices related to the site's maintenance of IWRA's has been implemented and quantified. At the site level, 100% of identified IWRA's (including rainwater harvesting structures and stormwater systems) are regularly inspected and maintained as per the Water Stewardship Plan.

At the catchment level, restoration and maintenance of multiple traditional tanks and recharge structures have been completed, resulting in 574,125 m³ of additional storage/recharge capacity created against a target of 332,000 m³, demonstrating measurable contribution to the protection and enhancement of IWRA's within the catchment

The site has presented data under 3.5.1, 3.5.2, and 3.5.3, where they have set targets for the development of ponds, tanks, check dams, borewell rehabilitation, etc., in villages in the catchment and have provided data on the number that have been achieved.

The auditors were able to witness some of these in practice in the villages during the catchment tours.

ITC Manual Step 3 PDF

3.9.10 *Voluntary Advanced Indicator* 
Yes
Achievement of identified best practice related to targets in terms of WASH shall be quantified.

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Comment Achievement of identified best practices related to WASH targets has been quantified. At the site level, 100% of employees and contract workers have continuous access to safe drinking water, gender-segregated sanitation facilities, and handwashing stations, in compliance with statutory norms.

At the catchment level, the site has supported WASH interventions in villages, schools, and Anganwadis, including provision/improvement of drinking water and sanitation facilities and hygiene awareness programmes, resulting in improved access to WASH services for community stakeholders, particularly in water-stressed areas.

At the catchment level, achievement of best practice in WASH has been quantified through infrastructure creation and coverage. The site has supported WASH facilities in 50 Government schools and 41 Anganwadis, covering 3,918 school students and 1,240 Anganwadi children. Interventions include construction/renovation of 32 school toilet blocks, 15 Anganwadi toilets, drinking water facilities in 27 schools and 33 Anganwadis, and handwashing platforms in 37 schools and 41 Anganwadis.


In addition, WASH awareness programmes have been conducted across 14 Gram Panchayats, reaching 6,976 students, with institutional strengthening of 35 SDMCs, 15 Mother Committees, and 22 Child Cabinets to ensure sustained operation and maintenance of WASH infrastructure.

ITC Manual Step 3 PDF

3.9.11 *Voluntary Advanced Indicator* 
Yes
A list of efforts to spread best practices shall be identified.

Comment A list of efforts undertaken to spread best practices has been identified and documented. These efforts include knowledge-sharing workshops and trainings for farmers on micro-irrigation, IPM/INM, soil test-based fertilizer application, and mulching practices; demonstration plots and field days to showcase water-efficient and water-quality-protective practices; and capacity-building sessions for community institutions (Tank/User Groups, SDMCs, Mother Committees, Child Cabinets).

The site has provided evidence to show that they have worked extensively to spread Best Practice in water stewardship throughout the catchment; the main interactions have been around Water User Groups meeting and street games for locals, organised by NGO and gram panchayat. The projects that are best practice and are shared with them have been listed in the ITC Manual Step 3 PDF.

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

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Comment A list of collective action efforts has been identified and documented, including participating organizations, responsible persons, and the role played by the site. Key collective actions include:

Catchment studies and water governance: Conducted in partnership with MYRADA, WASHi, Geovale, and academic/technical experts, with coordination support from Gram Panchayats and line departments. Role of the site: funding support, facilitation, data sharing, and review of findings.


Watershed development and IWRA restoration: Implemented with Department of Watershed Development, Agriculture and Horticulture Departments, and local NGOs, involving Tank/User Groups and community leaders. Role of the site: co-planning, financial support, technical inputs, and monitoring.

WASH interventions in schools and Anganwadis: Undertaken with Education Department, Women & Child Development Department, and NGO partners. Role of the site: needs assessment, infrastructure funding, coordination, and impact monitoring.

Agriculture water-use efficiency and water quality initiatives: Promoted with farmer groups, NGOs, and extension agencies through trainings and demonstrations on micro-irrigation, IPM/INM, and soil test-based nutrient management. Role of the site: capacity building, demonstration support, and knowledge dissemination.

Each collective action has designated focal persons from partner organizations (e.g., Panchayat officials, department nodal officers, NGO programme managers), while the site's EHS/Water Stewardship Lead serves as the primary coordinating point. These efforts demonstrate structured, multi-stakeholder collaboration towards shared water stewardship outcomes.

The site has prepared a table showing the collective actions and the role played by ITC and the institutions and the people involved from the entities.
See ITC manual Step-3 PDF

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

Comment Collective action since the baseline has delivered 574,125 m³ of additional water storage (173% of target), strengthened 26 water institutions (vs. 22 planned), expanded micro-irrigation to ~1,008 ha, and improved WASH access across 50 schools and 41 anganwadis, benefiting ~3,918 students. Stakeholder records (TUGs, GPs, departments) confirm the site's material and positive contribution to these outcomes.

See ITC manual.

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>Performance against all targets in the site's Water Stewardship Plan has been systematically evaluated and achieved, with measurable improvements demonstrated across water balance, water quality, WASH, IWRAs, and water governance. The site's actions have made a clear and quantified contribution to AWS outcomes, verified through third-party audits, management reviews, and documented catchment-level results.</p> <p>Refer ITC Malur-AWS certification Manual-Step 4 PDF</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>Value creation resulting from the Water Stewardship Plan has been evaluated and demonstrated across economic, environmental, social, and governance dimensions.</p> <p>Environmental Value</p> <ul style="list-style-type: none"> - 574,125 m³ of recharge/storage capacity created in the catchment against a target of 332,000 m³ (173% achievement), contributing to long-term groundwater sustainability. - About 9,250 KL of freshwater was substituted with harvested rainwater at the site level, reducing pressure on shared groundwater resources. - Zero Liquid Discharge (ZLD) maintained with 100% compliance of treated effluent quality parameters (pH, BOD, COD, TSS, Oil & Grease), preventing environmental contamination. <p>Economic Value</p> <ul style="list-style-type: none"> - About 8% reduction in freshwater withdrawal, leading to direct cost savings associated with water sourcing, pumping, and treatment. - Reduced long-term water risk exposure enhances operational resilience and business continuity in a water-stressed catchment. <p>Social Value</p> <ul style="list-style-type: none"> - WASH infrastructure and services were supported in 50 schools and 41 Anganwadis, benefiting 3,918 students and 1,240 Anganwadi children, along with hygiene awareness for 6,976 students. - Improved community water availability through recharge and watershed interventions, contributing to public health and social well-being. <p>Governance and Reputational Value</p> <ul style="list-style-type: none"> - Strengthening of 26 community water institutions (against a target of 22) and 100+ stakeholder engagements has improved participatory water governance. - Positive stakeholder feedback confirms the site's material contribution to collective action and catchment resilience, enhancing trust and social licence to operate. <p>Refer to the ITC Malur-AWS certification Manual-Step 4 PDF</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>

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Comment Shared value benefits generated in the catchment through implementation of the Water Stewardship Plan have been identified and, where applicable, quantified.

Water Availability & Environmental Benefits
 - 574,125 m³ of additional water storage/recharge capacity created through collective watershed and IWRA restoration interventions, against a target of 332,000 m³, improving groundwater availability for agriculture, domestic use, and ecosystems.
 - Reduced pressure on shared groundwater resources due to ~9,250 KL of freshwater savings at site level, indirectly benefiting other water users in the catchment.

Social & Community Benefits
 - WASH improvements implemented in 50 government schools and 41 Anganwadis, benefiting 3,918 school students and 1,240 Anganwadi children, along with hygiene awareness for 6,976 students across 14 Gram Panchayats.
 - Enhanced reliability of drinking water and sanitation facilities contributing to public health, dignity, and school attendance.

Livelihood & Agricultural Benefits
 - Promotion of micro-irrigation, IPM/INM, soil test-based fertilizer application, and silt application has improved water-use efficiency, soil health, and crop productivity, while reducing fertilizer runoff and input costs for farmers.
 - Agricultural best practices adopted across ~1,008 hectares, supporting sustainable livelihoods and reduced water quality risks.

Governance & Institutional Benefits
 - Strengthening of 26 community water institutions (Tank/User Groups, SDMCs, committees) has improved participatory planning, transparency, and collective decision-making.
 - 100+ stakeholder engagements have built trust, coordination, and long-term collaboration among communities, NGOs, and government departments.

Refer to the ITC Malur-AWS certification Manual-Step 4 PDF

4.1.4 *Advanced Indicator* ✔
Yes
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.

Comment The site conducts an annual executive-level review led by the Executive Vice President (EVP), during which shared water challenges, water-related risks and opportunities, water-related cost savings and benefits realized, and AWS performance against defined targets are reviewed and discussed.

As supporting evidence, the site provided the Minutes of Meeting dated 25 November 2025, and photographic evidence confirming the EVP's participation. Presentations and minutes from the executive review are also referenced in the ITC Malur – AWS Certification Manual, Step 4.

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

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

Comment No water-related incidents were recorded at the site in the previous year.

Refer ITC Malur-AWS certification Manual-Step 4 PDF

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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 Consultation efforts with stakeholders on the site's water stewardship performance have been identified and documented. Engagement has been carried out with a representative range of stakeholders through structured and periodic forums, including:

i. Gram Sabha and Panchayat-level consultations held during FY 2024–25 and FY 2025–26 in villages within the priority catchment (Malur and Hoskote taluks), involving Gram Panchayat members, farmers, SHG representatives, and community leaders, to discuss groundwater status, watershed interventions, and shared water challenges.

ii. Participatory Rural Appraisal (PRA) exercises conducted in selected villages during FY 2024–25, involving Water User Groups, Tank User Groups, women groups, and youth, focusing on evaluation of water balance improvements, IWRA restoration outcomes, and WASH needs.

iii. Multi-stakeholder review meetings held at the site and block level (Malur) with participation from line departments (Watershed Development, Agriculture, Horticulture, RDWSD, Education), NGO partners (MYRADA, WASHi), and technical experts, to review performance against Water Stewardship Plan targets and catchment-level impacts.

iv. School and Anganwadi-level interactions conducted during FY 2024–25 across 50 schools and 41 Anganwadis, involving teachers, SDMC members, Anganwadi workers, and students, to review WASH facility improvements and hygiene awareness outcomes.

v. Internal employee consultations through EHS committee meetings and management reviews at the site during FY 2024–25 and FY 2025–26, focusing on site water performance, efficiency improvements, and risk management.

Feedback from these consultations has been formally recorded through minutes, attendance registers, PRA documentation, photographs, and action trackers, and has been used to refine priorities, strengthen collective action, and inform continual improvement of the Water Stewardship Plan.

Refer ITC Malur-AWS certification Manual-Step 4 PDF

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



Yes

Comment The site's efforts to address shared water challenges have been evaluated by stakeholders across all five AWS outcome areas, and their feedback and suggestions for continual improvement have been documented and acted upon. Evaluation was carried out at village, catchment, and departmental levels through Tank/User Groups (TUGs), Farmer Field Schools (FFSs), Gram Panchayats, SDMCs, Anganwadi Mother Committees, NGOs, and government departments.

Stakeholders reviewed outcomes including water balance (574,125 m³ storage created; 185% of target), water quality improvements through sustainable agriculture, restoration of 595 IWRA's benefiting ~2,226 ha, WASH improvements in 50 schools and 41 Anganwadis benefiting ~5,158 children, and strengthened governance via 26 community institutions. Stakeholder feedback—recorded through meeting minutes, testimonials, and appreciation letters—confirmed the site's material and positive contribution, with suggestions leading to refinements such as enhanced O&M of WASH infrastructure, expanded micro-irrigation, and biodiversity-focused plantations

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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.*



Yes

Comment

The site has modified and adapted its Water Stewardship Plan, including the catchment plan, based on internal reviews, external evaluations, and stakeholder feedback. The site follows a structured practice of periodically revisiting long-term plans and conducting detailed stakeholder consultations through Participatory Rural Appraisal (PRA), focus group discussions, key informant interviews, and field/site visits to identify evolving stakeholder priorities. Based on these learnings, annual action plans are revised and implemented.

At the catchment level, a Core Area Perspective Planning (CAPP) study conducted in 2015–16 identified priority community needs, leading to focused interventions such as water harvesting, school infrastructure development, and Solid Waste Management programmes. In line with ITC's vision for inclusive and sustainable development, a CAPP 2.0 planning exercise was subsequently undertaken to reassess catchment needs. The findings indicated significant changes in developmental priorities, resulting in reframing and realignment of catchment-level water stewardship interventions.

In addition, action plans are dynamically modified based on stakeholder feedback received during implementation. For example, during discussions with Anganwadi Mothers' Committees (referenced under Indicator 4.3.2), the importance of operation and maintenance of WASH infrastructure was highlighted. In response, the site introduced community-managed fund boxes and soap boxes in Anganwadis and schools, promoted Child Cabinets for hygiene education, and strengthened SDMC orientation programmes to improve long-term operation and maintenance of WASH facilities.

Refer ITC Malur-AWS certification Manual-Step 4 PDF

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	<p>The site's water-related internal governance structure has been publicly disclosed, clearly identifying the roles, responsibilities, and positions accountable for compliance with water-related laws and regulations. The governance structure is displayed at the main gate of the factory, where it is freely accessible to employees, visitors, auditors, and other stakeholders.</p> <p>A formal Water Committee is in place with clearly defined responsibilities, including water conservation planning, budgeting, performance review, water reuse and recycling, employee awareness programs, and coordination of catchment-level water stewardship activities.</p> <p>Within this governance framework, the EHS Manager is designated as the accountable authority for ensuring compliance with all applicable water-related legal and regulatory requirements. The public display of this governance structure within the site premises ensures transparency, accountability, and accessibility.</p> <p>Supporting evidence is provided in the ITC Malur – AWS Certification Manual, Step 5.</p>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	<p>The Water Stewardship Plan, including its contribution to AWS Standard outcomes, has been effectively communicated to relevant stakeholders through multiple formal and informal channels.</p> <p>In addition, the plan and progress against AWS outcomes were communicated internally to ITC employees via meetings and awareness sessions (e.g., World Water Day events), and externally to community stakeholders through village-level meetings, PRAs, workshops, wall paintings, brochures, and public displays across the Malur catchment. These communications covered water balance, water quality, WASH, IWRA, and water governance outcomes, ensuring transparency and understanding among stakeholders.</p> <p>Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence.</p>
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>

Yes



Yes

Obs.

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Comment	A summary of the site's water stewardship performance, including quantified performance against targets, has been disclosed to stakeholders at the catchment level. However, key water-regulatory stakeholders—specifically the Karnataka State Pollution Control Board (KPCB) and the Karnataka Groundwater Authority (KGWA)—were not included in the disclosure. In addition, the disclosure was not carried out with raw material suppliers located within the catchment. Consequently, the site has not fully demonstrated comprehensive disclosure of water stewardship performance to all relevant stakeholders as required under the AWS Standard.	
5.3.2	<i>Advanced Indicator</i> <i>The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>	 Yes
Comment	The site's efforts to implement the AWS Standard have been disclosed in the organization's Annual Report, demonstrating transparent communication of water stewardship commitments, actions, and performance to all stakeholders. ITC's Annual Sustainability Report is used as the formal medium to disclose and highlight the Malur site's performance against the Water Stewardship Plan. The report includes information on AWS-aligned commitments, actions, targets, and outcomes and is publicly available, ensuring transparent and easy access for all stakeholders. Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence	
5.3.3	<i>Voluntary Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Yes
Comment	Same report as above. Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Obs.
Comment	The site has disclosed its shared water-related challenges and the efforts undertaken to address these challenges to stakeholders; however, some key stakeholders (KGWA, KPCB) were not included in this disclosure. As a result, the site has not fully demonstrated comprehensive and inclusive disclosure to all relevant stakeholders as required under the AWS Standard.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies have been identified and documented. The site actively collaborates with a wide range of stakeholders including farmers, Water/Tank User Groups, Gram Panchayats, Block Development Offices, Agriculture, Horticulture and Watershed Departments, Education and Women & Child Development Departments, and NGOs such as MYRADA and WASHi. Support and coordination include joint planning and implementation of watershed works, groundwater recharge structures, sustainable agriculture and micro-irrigation promotion, forest commons and biodiversity conservation, and WASH interventions. Evidence of engagement comprises MoUs, official letters, Gram Sabha resolutions, departmental acknowledgements, work completion certificates, training records, stakeholder meeting minutes, and photographs, demonstrating structured coordination and sustained public-sector support across village, block, and state level. Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence	

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

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

Comment There have been no site water-related compliance violations during the reporting period. Accordingly, no corrective actions were required. The site maintains full compliance with applicable water-related legal and regulatory requirements, supported by regular internal reviews, statutory monitoring, and management oversight.

Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence

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

Comment No water-related compliance violations were identified during the reporting period; therefore, disclosure of corrective actions is not applicable. Nevertheless, the site has implemented preventive measures including regular compliance reviews, statutory monitoring, maintenance of water infrastructure, staff training, and management oversight to prevent potential future occurrences.

Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence

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 No site water-related violations posing significant risk or threat to human or ecosystem health were identified during the reporting period. Accordingly, no immediate communication to public agencies was required.

The site has established procedures to ensure that any such violation, if it occurs, will be immediately reported to the relevant public authorities and transparently disclosed to stakeholders, in line with AWS requirements and applicable legal obligations.

Refer ITC Malur-AWS certification Manual-Step 5 PDF for evidence

Previous Findings

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

Comment All previous NC reviewed and closed.