

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000197



SITE DETAILS

Site: **San Pellegrino: Bergamo**

Address: Localita Ruspino, 24016, San Pellegrino Terme, Bergamo, ITALY

Contact Person: Walter Atriano

AWS Reference Number: AWS-000199

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Oct-10

Validity of certificate: 2023-Nov-30

AUDIT DETAILS

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

Audit Type(s): Surveillance Audit1

Audit Start Date: 2022-Feb-24

Lead Auditor: Claudia M. Jaime

Audit team participants:

Claudia M Jaime, Lead Auditor

Carlo Enrico Freschi, Local Auditor

Site Participants:

Walter Atriano, Factory H&S Manager

Stefano Tassis, Energy Manager

Nazareno Piermarini, Factory Manager

Piero Viola, Source Manager

Romano Barcella, Source Manager Site

Stefano Fioletti, Source Specialist

Giambattista Zani, WWT Manager

Fabia Ruggeri, Public Affairs

Mario Naldi, Consultant

Luigia Ferrari, Project Engineer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 4 major non-conformities, 3 minor non-conformities and one observation were raised during the certification audit. The client is requested to submit a corrective action plan for each of the non-conformities identified. All major non-conformities must be sufficiently addressed and closed out within 90 days. Minor non-conformities shall be closed out by the time of the subsequent surveillance audit.

CLOSURE OF FINDINGS:

The corrective action plan addressing all findings was submitted and approved by WSAS. The major non-conformities have been closed out.

The transfer of the site's AWS certification to WSAS has been approved. A WSAS certificate with the original validity date of 30th November 2023 has been issued.

Scope of Assessment: The scope of services covers the surveillance audit of San Pellegrino Bergamo against the AWS International Water Stewardship Standard Version 2.

The bottling business started in 1899 at Spa and moved to Ruspino in the 1960s, but it was not under Nestle Water control until 1998. The company's activity is the bottling of mineral water based products and non mineral water based products.

The facility is located in the San Pellegrino water basin. The catchment is located in San Pellegrino Terme, North of ITALY. There are 3 hydrological basins in the San Pellegrino Terme area:

- San Pellegrino Basin: feeds the deep mineral water aquifer (confined aquifer, San Pellegrino springs and wells) and the shallow aquifer in the upper Dolomite rock formation (unconfined aquifer, Boione spring and industrial water wells);
- Limpia Basin: feeds an unconfined aquifer in the fractured Dolomite rock formation with shallow springs/wells for industrial and/or potable use. The Limpia aquifer is therefore a natural runoff.
- Brembo River Basin: feeds the shallow aquifer hosted in the river bed, exploited by some shallow water wells for industrial use or to supply swimming pools (unconfined gravel/sand aquifer).

The audit was conducted onsite on 24th-25th February 2022.

The onsite visit included the assessment of the sites water sources (SPI, SPII y SPIII), as well as the main facilities including chemical storage, and their wastewater treatment plant. During the audit the audit team conducted interviews with stakeholders and held meetings with strategic members of staff in order to understand their achievements since last audit (remote) as part of the present audit (on site).

FINDINGS

Observation	1
Minor	3
Major	4

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FINDING DETAILS

Finding No:	TNR-000416
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	<p>During the inspection at the utilities chemical products deposit located at level -1 the following problems were noted related to a lack of operational control:</p> <ul style="list-style-type: none">• The anti-acid floor protection inside the segregated area is damaged,• the methods of operation and emptying of the drainage collection pit are not immediately available,• there is no evidence of planning and execution of the tightness test of this pit (found to be full at the time of the inspection);• some containers of chemical products are not stored on the suitable safety tanks provided to avoid spillage.
Corrective action:	The chemical tanks will be replaced
Finding No:	TNR-000419
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2022-Jul-01
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>A detailed water stewardship plan was created as part of the AWS process. The plan is broken into shared water challenge, risk, opportunity, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. The main AWS outcomes are identified in this plan. There are no planned time frames for achieving the targets identified. This should be corrected. Each target/action must have a defined timeframe/date for achieving the target. "Ongoing" is not an acceptable timeframe.</p>
Corrective action:	Update Plan as you requested

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Finding No:	TNR-000414
Checklist Item No:	3.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Jul-01
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The Site has submitted its action plan and all results presented are for the period 2018-2019. There is no evaluation of the results achieved in 2020 and 2021.
Corrective action:	The site has updated the WS Plan to include the status of achieving the water balance targets.
Finding No:	TNR-000411
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Due date:	2023-Mar-31
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	<p>The site has presented its progress against each objective which can be seen in the following documents:</p> <p>Shared risk opportunity plan KPI 2017,2018,2019</p> <p>However, the 2021 progress has only been presented in printed form. For next audit the site is requested to provide evidence of most recent assessments (2020-2022) of their performance and contribution to achieving the water stewardship outcomes.</p>
Finding No:	TNR-000412
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site has submitted as evidence the Shared Risk opportunity and Plan_.However, it does not include the evaluation of its results for the immediately preceding year (2021).
Corrective action:	The site will Calculate cost savings from all measures put in place, e.g. lower taxes paid. Take 2020 data and compare it with 2021 data to show the cost savings.

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Finding No: TNR-000413
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Mar-31
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: The shared value benefits in the catchment have been identified according to documents from 2020; however, the site has not described their shared value benefits in the catchment for 2021. They have not quantified the activities related to site rehabilitation and soil protection from erosion, mentioned in their "SP narrative water strategy" document (2.3.1); and described on the 1st day of the audit.
Corrective action: Site restoration and soil protection from erosion: conducting an assessment of the value generated for the community.
Summary of costs and benefits
Giving monetary value to costs and benefits
Compare the two values

Finding No: TNR-000442
Checklist Item No: 4.4.1
Status: Closed
Finding level: Major
Due date: 2022-Jul-01
Checklist item: The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings: The Site has performed a cost benefit analysis updated to 2021; however they have not incorporate any relevant information and lessons learned from their evaluations in their Water Stewardship Plan.
Corrective action: In the Plan, you find the sheet "action log water" in this sheet you find all action link to cost and benefit

you find the monthly meeting, in this meeting we checked all Project and take action

but in 2021 we had close the project, but this project we don't need analysis cost and evidence as internal,

In attached the procedure

Regards
Walter

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Finding No:	TNR-000410
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Jul-01
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has not produced an annual summary of their water stewardship performance including quantified performance against targets for 2021. No evidence of disclosure was provided.
Corrective action:	You find in the file Sustainability balance for 2022, you find the information on Factory Page 135 in this moment, the report is only italian Language, the next month, There will be in english, Update with Plan that we communication to SH
Evidence of implementation:	Please provide and attached evidence of disclosure.

Signature WSAS

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Report Details

Report	Value
Report prepared by	Claudia M Jaime
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	31/03/2022

Surveillance

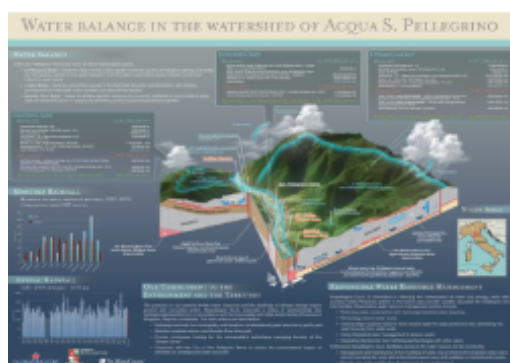
Proposed date for next audit
2023-Feb-28

Comment The following audit will include the revision of all the indicators marked N/A in this audit.

Stakeholder Announcements

Date of publication	Location
Comment	Not applicable for Surveillance Audit

Catchment Information



Water Balance in the Watershed of Acqua S Pellegrino.png

Catchment Information

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The site defines its catchment area as the mineral water aquifers under the control of SANPELLEGRINO S.p.A. in the municipality of SAN PELLEGRINO - Bergamo Region Lombardy Italy.

The area where the site is located includes three hydrological micro-basins:

- San Pellegrino basin, which feeds two aquifers: the first deep mineral water aquifer and the second shallow aquifer of the upper Dolomite rock formation (this is the main water source for the site);
- Lìmpia Basin, which feeds an unconfined aquifer in the fractured Dolomite rock formation with springs and shallow wells for industrial and/or drinking use.
- Brembo river basin, which feeds a shallow aquifer hosted in the river bed, where some wells are located for industrial use or to supply swimming pools (unconfined gravel/sand aquifer).

The Brembo river, which flows close to the factory, is not included as a primary catchment element.

The catchment is located in San Pellegrino Terme, North of ITALY.

The Brembo river flowing nearby the factory is not included as a primary element of the catchment. It flows from a spring located in Pizzo Tre Signori – Alpi Orobie at 12142m and downstream joins the Adda River approx. 40 km away. The whole Brembo river area is a controlled area for fishing. Biodiversity is not regulated in the area.

A general narrative description has been provided.

Client Description and Site Details

Client/Site Background

The area of the hydrological basin of San Pellegrino Terme is a historically anthropized area.

The healthy properties of the water of San Pellegrino were already known at least in the twelfth century (legend has it that Leonardo da Vinci also visited the source), but the systematic use of water for therapeutic treatment began in the eighteenth century and flourished in the nineteenth century, thanks to scientific research on the benefits of mineral waters and, in this specific case, the development of the road network that in 1824 made San Pellegrino accessible daily by the postal service and cars.

The impulse started in the nineteenth century by the birth of the Società delle Terme, which included both the thermal baths and the bottling plant, gave way to a rapid and exponential development of the territory, which still today is "read" in the grandiose Liberty architecture of the country, in particular the Casino and the Grand'Hotel. San Pellegrino Terme became, at the turn of the two centuries, a renowned European spa resort, with peaks of up to 50,000 presences.

The opportunity to bottle mineral water, to continue the spa treatments on site and enjoy the benefits even at home, gave impetus to the birth of the mineral water market in Italy - of which S.Pellegrino was the driving force and produced at the top - reserved in the first decades of the '900 ad a niche of consumers but destined to grow and become part of the consumption habits and Italian culture starting from the 50s and 60s, in conjunction with the economic boom.

S.Pellegrino soon became an excellent table water and thanks to its international vocation that characterized the brand already at the beginning of the century, when it was exported overseas, today it is present in the best restaurants around the world.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The shared challenges related to the water resource can be summarized in the following points.

- Sustainable brand growth
- Protection of groundwater in a heavily anthropized territory
- Greater direct integration in the governance of technical bodies and bodies for the management of the drinking water cycle and the prevention of hydrogeological instability
- Protection of the water quality of the Brembo River
- Enhancement of the water resource asset of the territory in a context of revival and strong tourist impulse.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	<p>The San Pellegrino Basin hydrographic system consists of a main drainage axle (Brembo River) and first and second-order tributaries (side-stream tributaries). Specifically, the San Pellegrino Basin is located on the right side of the wall and does not interfere with the Brembo River (which is suspended on the immeable formation of riva di Solto clays on the entire hydrogeological basin projection). The only continuing tax authority is Torrente Borlezza which is some lower-order and outlets (channeled) towards Brembo in correspondence of the former San Pellegrino plant.</p>
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	<p>The site is managed under a single-based management system by Nestlé Waters San Pellegrino SPA</p>
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
Comment	<p>The site's primary production process is bottling water.</p>

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1 STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none"> - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Comment	The site has presented maps where the site boundaries are included at the catchment level; as well as their water related infrastructure, including piping network. The maps also include the water sources providing water to the site that are managed (concessions) by the site, discharge points and their own waste water treatment plant.
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Comment	The site has identified a group of stakeholders, they considered 12 SH as relevant. In its evaluation of SH the site took into consideration local people, local authorities, local businesses, employee engagement and leadership.
1.2.2	<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>
Comment	Stakeholders are related to the site's catchment and the site has identified the stakeholders' ability to influence or be influenced. The stakeholders are characterized according to their level of Influence/Interest (low to critical) and their opinions towards NW San Pellegrino SPA are described.
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>

Comment The Risk Management Review was assessed and the Incident response were addressed in the plans. The water-related incident response related the well management are:

- Wells area intrusion: All wells are inside protected areas (segregated and with remote control).
- Aquiferous pollution from the surface: SP2 and SP3 have a 72 / 100m layer of clay between the surface and the aquiferous. P1 is inside a building in a controlled area.
- Aquiferous pollution for vibration coming from the surface: specific precaution taken during the refurbishment of the new spa around source SP1: all activities controlled as a deconstruction Controlling the vibration to prevent underground movement. the site covered from the rain. The whole new building is protected with double lining to avoid infiltration.
- Interconnecting pipes degradation: all underground pipes of wells and from well to the storage tanks and site are in coated SS.
- Potential soil Contamination in the new car parking where part of the new pavement is draining to allow stormwater drain but there is a risk in case of truck oleo mechanical system failure.

One emergency has been recently (November 2021) experienced:

Finding: loss of oil from a truck.

Action: immediate remediation followed by stopping of the well n.9 which could be potentially affected.

End of emergency: evaluation after a long period of the water pumped from the well without oil presence.

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


Yes

Comment The Site prepared and provided water maps containing inputs and outputs of water at this facility. Data showing monthly water inflows, outflows, and losses were reviewed. The site utilizes a Water Withdrawal (WW) to evaluate efficiency, measuring m3 of water used to produce a m3 of product.

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.*


Yes

Comment The site water balance contains a general analysis of a few indicators. The main indicator is the water used per product (m3 of industrial water used to prepare 1 m3 of sold product)

The evolution of this indicator of performance is checked periodically and they can compare these data between years and let to check the evolution. Document added at the former indicator (1.3.2)

- 2018: 2,10
- 2019: 1,94
- 2020: 1,92
- 2021 1,75

Apart from this high-level water balance the site. carefully controls the production of water bottling allocated in different products (drinks, glass, PET and ESSENZA+ACQUA IN LATTINA different lines) to control the evolution along different years.

Thanks to specific projects the site. is continuously improving its environmental indicators achieving to reduce the water consumption by a 20% within 4 years.








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

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Comment	The Site periodically realizes analysis on the water coming from the wells: these analyses show that the mineralization over the years is preserved. This is considered by the Site as a point of strength for the business and industrial company evaluation. The Site performs analysis from its industrial wastewater after the treatment plant. The Site complies with their limits and regulations; during the visit they mention they could have inspections without notice and never have identify any problem. These analyses are performed monthly.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 No Finding No: TNR-000416
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	No on-site IWRAs were identified.	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 Yes
Comment	The Site includes a list of annual water-related costs, revenues and description / quantification of social, environmental or economic value generated related to the water management, by the site to the catchment in the document "Cost revenues CSV 26_6 dati Anno 2020-2021"	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	According to the documentation and different exhibits presented by the site and what has been observed during the conduction of the present audit, it can be confirmed that the access and adequacy of WASH at the site is guaranteed. A new project related to the reuse of stormwater for sanitary use is ongoing and included in the new facility master plan. This will bring to a reduction of consumption of potable water, now taken from the industrial wells distribution system, with a lower suction from the wells in the Brembo catchment.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes

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Comment	<p>A list of significant publicly led initiatives and water related public policy goals for the catchment was provided. A description of actions related to governance outcome is included in the catchment plan review summary provided and discussed.</p> <p>The collaboration with the Municipality has always been very strong, with the shared goal of defending the sources of a product that bears the name of the country from which it comes, known all over the world and strategic for local employment, as Sanpellegrino is the largest industrial reality in the valley.</p> <p>This collaboration has been expressed over the years in the participation of Sanpellegrino S.p.A. , together with other private players, the program agreements agreed with the Municipality, aimed mostly at relaunching tourism in the area and enhancing the water resource, consistent with the historical role of the company that has always operated in a perspective of public-private synergy.</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The Site has the assessment of its compliance with legal and regulatory requirements yearly according to the requirement of its internal management ISO 14001 system.</p> <p>Special focus is always given to the mineralized water concessions from where the raw water for production is taken.</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	<p>The catchment water balance with precipitation, point source flows, subsurface flow runoff, hydrogeological characteristics and ET data were provided for the San Pellegrino Spa includes the three hydrological basins. Including the data summary of these three hydrological water balances. (from Model My Watershed Multiyear Model)</p>	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	<p>The site analyzes chemical parameters on all the industrial wells yearly and weekly on the mineralized water. It also includes physical and biological status of their catchment according to their commitment to the environment and the territory.</p>	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	<p>The Site has identified IWRA and the status of different protection areas around the basins into the catchment.</p>	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	<p>The site has submitted a map with the existing infrastructure including the water pipelines (underground) and the location of the wells under concession. During the past year the infrastructure of the wells has been maintained and rehabilitated and surveillance is maintained to prevent or be alert for potential extreme events.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	<p>The adequacy of available WASH services within the catchment has been identified as satisfactory. The population of San Pellegrino has access to sanitation, drinking water and hygiene (including schools). During the pandemic, the site has provided water and sanitisers to schools and authorities to maintain high standards of hygiene and ensure access to safe drinking water.</p>	

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1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>The Site included a list of their identified shared water challenges:</p> <ul style="list-style-type: none">• Sustainable growth in San Pellegrino brand volumes, compatible with source charging capabilities• Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock)• Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention• Brembo River quality and quantity protection• Valorization of the territory's water asset in a context of revitalization and strong tourism drive. <p>The document Shared risk opportunity and plan defines risk and opportunities, SH expectations, action, Kpi and the Water Stewardship plan; it also includes its level of priority</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>A list of existing initiatives was provided and reviewed.</p>	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>The site has identified a list of water risks related to shared water challenges and other risks not related to shared water challenges; the list includes a prioritization, current status likelihood of occurrence and future trends.</p>	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	<p>A list of opportunities has been reviewed including prioritization,</p>	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 N/A
Comment	<p>The indicator was not assessed during Surveillance 1.</p>	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 N/A
Comment	<p>The indicator was not assessed during Surveillance 1.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 N/A
Comment	<p>The indicator was not assessed during Surveillance 1.</p>	

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1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	The site has published its statement on the web page https://www.sanpellegrino-corporate.it/it/creazione-di-valore-condiviso-del-gruppo-sanpellegrino-456	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	The Site's chart identifies responsible persons/positions within the facility organizational structure with a focus on the H&S management system. A signed and publicly disclosed site statement OR organizational document has been identified in this page: https://www.sanpellegrino-corporate.it/it/creazione-di-valore-condiviso-del-gruppo-sanpellegrino-456	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	A water stewardship strategy statement signed by the factory manager was provided and reviewed. NW San Pellegrino SPA strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements. Also published at the Site web page.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 	 closed

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Comment

A detailed water stewardship plan was created as part of the AWS process. The plan is broken into shared water challenge, risk, opportunity, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, timing, responsible person, status, and other criteria. The main AWS outcomes are identified in this plan. There are no planned time frames for achieving the targets identified.

Finding No: TNR-000419

2.4

Demonstrate the site’s responsiveness and resilience to respond to water risks

2.4.1

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

Yes

Comment

The Site has include in their Water Stewardship Plan a plan to mitigate and adapt water risks describe it at SP narrativa water strategy def.

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✓
Comment	Yes The Site provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand education on AWS and outcomes toward good water governance. This was confirmed through stakeholder interviews. The site has identified two shared water challenges related to governance: Priority 1: Need for more direct integration in governance with the bodies and technical bodies managing the drinking water cycle and preventing hydrogeological instability Priority 2: Enhancement of the water resource asset of the territory in a context of relaunch and strong tourism impulse. (Source: Shared water challenges at shared risk opportunity and plan).
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. ✓
Comment	Yes The water rights are guaranteed by Italian law and it is included at the San Pellegrino SPA. policy.
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. ✓
Comment	Yes The mineral and industrial wells authorizations were checked. These water catchment authorizations are given by the competent authority. The mineral water authorizations are undefined (SP1), while for SP2, SP3 and industrial water they have 30-year period concessions. On the treated wastewater discharge San Pellegrino SPA. have the environmental authorization where the concentration of pollutants limit values at the discharge point are set. San Pellegrino SPA. keeps strict control on the inlet/outlet water quality with periodical analysis according to the NW regulatory requirements (which are more strict than the national) and complemented with additional analysis as an internal requirement. Relevant documents (only for wells)
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. ✓
Comment	Yes Water Rights are guaranteed by Italian Law
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. ✓
	closed

Finding No: TNR-000414

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3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	San Pellegrino, SPA. is located in an area not considered water scarce. However, the site has set targets to reduce water consumption annually, the water reuse plant and improve the ratio bottled water / catchment water. "KPI 2017 2018 2019 2020 and 2021	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legally enforced reallocation of water to social, cultural or environmental needs in the region.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Water Quality is one of the shared water challenges and has been identified as a top priority. It is considered relevant for the quality of the water resource in the area.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The Site has identified the Brembo River as the most important water-related area (IWRA). It has also established cooperation agreements with the municipality to manage this area.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	

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3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 N/A
Comment	The indicator was not assessed during Surveillance 1.	

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4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	Q Obs.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	✗ No
	Finding No: TNR-000412	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	✗ No
	Finding No: TNR-000413	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	↓ N/A
Comment	The indicator was not assessed during Surveillance 1.	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	✓ Yes
Comment	<p>The Site has engaged an active communication with the identified stakeholders to be repeated once a year to review its water stewardship performance and share with the stakeholders the site's performance. This consultation is finalized to confirm shared water challenges and Important Water-Related Areas in the catchment. The form of the consultation is appropriate for the local context and the stakeholders engaged. Direct consultation will be repeated every year.</p> <p>The Site has the commitment to improve its knowledge of the Community Relation Process performed on 2019 an evaluation on NWI Local Acceptability Index: trend, a detailed survey prepared by DOXA covering different topics including site water management. The updates is planned for April 2022</p>	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	✗ No
	Finding No: TNR-000442	

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	 Yes
Comment	The site presented evidence of meetings via TEAMS with stakeholders to present the progress of the implementation of the AWS standard (date 2-6 Nov. 2020). During the interviews with stakeholders it was confirmed that the site keeps an active communication related to the implementation of the AWS outcomes.	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	 No
Finding No: TNR-000410		
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
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.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	

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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.	 N/A
Comment	The indicator was not assessed during Surveillance 1.	

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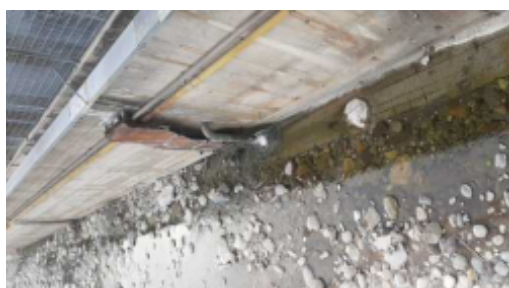
Photographic Evidence from Audit



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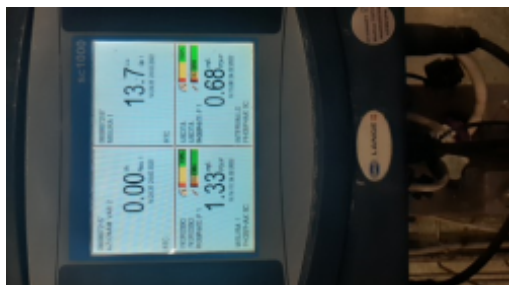


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Yes

Previous Findings

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



Yes