CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000570

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **La Galvanina Val Di Meti - Apecchio**
Address: Localita' Pian de Molino, 61042, Appechio (PU), Marche, ITALY
Contact Person: Gianluca Privitera
AWS Reference Number: AWS-000560
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Oct-10
Validity of certificate: 2026-Oct-10

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-May-30
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Freschi, Lead Auditor

Site Participants:
FRANCESCA LANDI, Department Head HSE
GIANLUCA PRIVITERA, Director
STEFANIA PRESTA, Consultant
MAURO FIORENZATO, Consultant

ADDITIONAL INFO

Summary of Audit Findings: A total of 24 findings were raised during the certification audit: 3 major non-conformity, 12 minor non-conformities and 9 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 10 October 2023.

The major non-conformity must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 10 November 2023.

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

The audit team recommends certification La Galvanina - Stabilimentio di Val di Meti Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformity and submitted the corrective action plan addressing all findings.
Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of La Galvanina – site of Val di Meti hereinafter referred to as “the site”) against the AWS International Water Stewardship Standard Version 2.0 dated March 2019.

On May 30 and 31, June 1 2023 WSAS conducted the conformity assessment of the site’s facilities and activities with regard to certification to the AWS Standard.
The audit plan is attached as a separate document.

During the conformity assessment, the audit team spent 2 hours on the stakeholder consultation meetings, and 0,75 days on the inspection of the site's installations and activities, its water sources and wells area, raw water storage tank, bottling plant, and WWTP, together with personnel interviews and document reviews.

The catchment is a hilly area that extends between the areas of the Apennine mountains up to the coast of the Adriatic Sea. The Meti valley is made up of an uninhabited wooded hilly area upstream where the two main springs and the factory are located. The hilly area represents the syncline structure, made up of Cenozoic terrigenous formations of the Umbria-Marche succession and of minor ridges in which Mesozoic and Cenozoic calcareous-marl formations emerge. In the valley flows the Biscubio stream which feeds the Candiglianio stream which in turn flows into the Metauro river, of greater flow which characterizes the area and then flows into the Adriatic Sea.

The catchment has been defined as the only Val di Meti area where the Biscubio flows; La Galvanina plant is located approximately in the middle of the valley.

The building includes areas for the storage of raw materials, the lines for glass and PE bottling, packaging, and shipping, and a building for office activities. Outside the building, but still, within the perimeter of the property, there are the incoming water storage silos and the outgoing wastewater treatment plant.
All springs, wellheads, internal and external areas have been inspected.

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	9
Minor	12
Major	3

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

FINDING DETAILS

Finding No:	TNR-004668
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	Current degree of influence has been identified, however the potential degree of influence in water stewardship between the site and stakeholders within the catchment, has not been identified.

Finding No:	TNR-004669
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Due date:	2024-May-30
Checklist item:	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.
Findings:	The site discharges the rainwater into the river: this water is flowing from the car and truck parking area, from the site's external roads, and from a dangerous waste deposit partially not covered. The site has not quantified the risk related to potential pollution in terms of quality and quantity. This point might be a threat to good water quality status for people or environment and it's also linked with indicator 1.3.5.

Finding No:	TNR-004670
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The site discharges the rainwater into the river: this water is flowing from the car and truck parking area, from the site's external roads, and from a dangerous waste deposit partially not covered. The site has not identified this as a potential source of pollution. This point is linked with indicator 1.3.4.
Corrective action:	it is planned to add to the "Potenziali fonti di inquinamento" chapter of the AWS Handbook rev03 the identification of cited sources of pollution

Finding No:	TNR-005303
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	No all data is up to date, there is data from 2021, for example: variable costs of maintenance of water infrastructure and products shipped by Val di Meti. There is not estimation of the variable budget allocated to the AWS project.

Finding No:	TNR-005348
Checklist Item No:	1.3.8
Status:	Open
Finding level:	Observation
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	The access of WASH services was checked during the site visit by the auditor. However, there is no evidence of identification of the levels of access and adequacy of WASH at the site.

Finding No:	TNR-005247
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The identified actions to address the shared water challenges are most related to the communication outcome. It is recommended to extend them to sustainable water balance and good water quality status.

Finding No:	TNR-005342
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	It is not clear how the assessment of the opportunities will be done.
Corrective action:	It is planned to include in handbook, among the tasks of the Water Team, at the annual review, the evaluation of opportunities in order to determine new goals or the updating of them.

Finding No:	TNR-005343
Checklist Item No:	1.8.1
Status:	Closed
Finding level:	Major
Due date:	2023-Nov-10
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	It is not clear which actions from ISO 140001 certification are considered as relevant catchment best practices for water governance.
Corrective action:	Under the chapter "Best Practice" of the AWS Handbook added other actions considered relevant.

Finding No:	TNR-005250
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Major
Due date:	2023-Nov-10
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	It is not clear which of the AUA prescriptions in terms of IWRA's are identified as best practices. Legal/regulatory requirements are not considered best practice.
Corrective action:	Under the chapter "Best Practice" of the AWS Handbook added other actions considered relevant.

Finding No:	TNR-005345
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Major
Due date:	2023-Nov-10
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	It is not clear why the site's water infrastructure to provide water for employees and visitors is considered as best practice. Legal/regulatory requirements are not considered best practice.
Corrective action:	Under the chapter "Best Practice" of the AWS Handbook added other actions considered relevant.

Finding No:	TNR-005251
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Findings:	The policy is dated 07-11-2022 and signed by the previous legal representative. The new CEO from 04-05-2023 signed the Policy shown during the audit (to be published on the website). The new version has not been disclosed in the website.

Finding No:	TNR-005253
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	There are not targets and actions linked with these two AWS outcomes: Important Water Related Areas and WASH.
Corrective action:	Once new best practices inherent in IWRA and WASH are identified (from corrective actions of NC Majors), the water stewardship plan is expected to be updated to include the newly defined objectives

Finding No:	TNR-004674
Checklist Item No:	3.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The site used the process to verify legal and regulatory compliance already in place for ISO 14001, but the requirements related AWS System and water rights are not covered. The check list used to demonstrate the legal compliance (used for legal compliance for EMS certification) doesn't cover: -AUA requires the planning of maintenance activities and the periodical monitoring of the total flow to confirm the max total volume of treated water allowed per year. The site doesn't have an internal procedure and record to cover this requirement. -AWS general requirements as voluntary system adopted by the site, internally becomes equivalent to legal obligation and therefore must be taken into consideration according to 14001.
Corrective action:	ISO 14001 system procedures will be updated to take over the items currently not covered

Finding No:	TNR-004677
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	It is not clear which practices the site will implement to maintain and/or enhance the Important Water-Related Areas. Refer to indicator 2.3.2, there are not targets/actions linked to the IWRA's outcome.
Corrective action:	Once new best practices inherent in IWRA are identified (from corrective actions of NC Majors), the water stewardship plan is expected to be updated to include the newly defined objectives

Finding No:	TNR-004678
Checklist Item No:	3.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings:	There is no evidence that the water distributed onsite for all workers is certified as potable and safe for drinking. There are not targets set for WASH in the Water Stewardship Plan, refer to 2.3.2.
Corrective action:	Galvanina makes the water it produces available to employees. It is planned to add a description of this practice in the "WASH" chapter. Plans are made to update the AWS plan based on newly identified best practices

Finding No:	TNR-005349
Checklist Item No:	3.9.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	It is not clear which actions from ISO 140001 certification are considered as relevant catchment best practices for water governance. Thus, there is no evidence of implementation of these. Refer to indicator 1.8.1.
Corrective action:	As documented by the EU the very implementation of a voluntary Environmental Management System is considered a best practice that Galvanina has adopted. In any case, additional best practices, which resolve the major will be taken up and added to the chapter "Best practice" of the AWS Handbook

Finding No:	TNR-005350
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	It is not clear which of the AUA prescriptions in terms of IWRA's are identified as best practices. Refer to indicator 1.8.4. Legal/regulatory requirements are not considered best practice. Thus, there is no evidence of implementation of these.
Corrective action:	Once new best practices inherent in IWRA are identified (from corrective actions of NC Majors), the water stewardship plan is expected to be updated to include the newly defined objectives

Finding No:	TNR-005351
Checklist Item No:	3.9.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	It is not clear why the site's water infrastructure to provide water for employees and visitors is considered as best practice. Legal/regulatory requirements are not considered best practice. Refer to indicator 1.8.5. Thus, there is no evidence of implementation of these.
Corrective action:	Once new best practices inherent in WASH are identified (from corrective actions of NC Majors), the water stewardship plan is expected to be updated to include the newly defined objectives

Finding No:	TNR-005369
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site will be required to present evidence of the performance evaluation at the Surveillance 1 Audit

Finding No:	TNR-005370
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site has not presented evidence of how they plan to evaulate Value Creation from the WS Plan. Evidence will be required at the Surveillance 1 Audit.
Corrective action:	In the AWS Handbook the methodology found for assessing the value generated by the implementation of the WS plan will be explored in depth

Finding No:	TNR-005371
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.

Finding No:	TNR-005373
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has not addressed this indicator and evidence will be required at Surveillance 1
Corrective action:	In the AWS Handbook the methodology found for assessing the value generated by the implementation of the WS plan will be explored in depth

Finding No:	TNR-005372
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site has not incorporated yet any relevant information and lessons learned from their evaluations at its Water Stewardship Plan: to be verified at the first surveillance.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000570

Finding No:	TNR-004683
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-30
Checklist item:	The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations has not been disclosed.
Corrective action:	It will be planned to publish the organizational chart, specifying the people who have influence on the implemented AWS system, on the website and on the boards within the company

Report Details

Report	Value
Report prepared by	Carlo Freschi
Report approved by	Monserrath Zamora
Report approved on (Date)	10 August 2023

Surveillance

Proposed date for next audit
2024-May-28

Stakeholder Announcements

Date of publication	Location
	https://www.galvanina.com/wp-content/uploads/2023/04/2.1.1_POLITICA_AWS_Ed01_Rev00_06-04-2023.pdf?_gl=1*a87ahn*_ga*OTM2MTQ3OTYxLjE2ODcxNjAxNjM.*_up*MQ.. AWS Website: https://a4ws.org/wp-content/uploads/2023/03/AWS-000560-La-Galvanina-2023-Stakeholder-Announcement.pdf WSAS Website: https://watersas.org/wp-content/uploads/2023/03/Stakeholder-Announcement-La-Galvanina-Spa.pdf

Comment

The stakeholder announcement was published on the AWS site two months before the certification date.

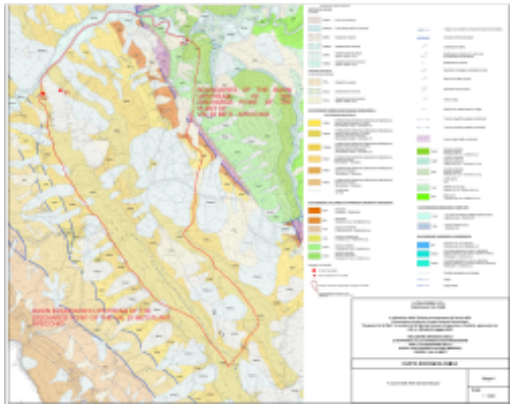
Stakeholders were first notified at large scale, PA side, customers and suppliers, by email (from 06/03/2023 to 12/04/2023).

For the majority framed Stakeholders, such as municipality of Apecchio, University of Bologna, Confindustria PU, the detail and transmission emails are provided as evidence, which were followed by an alignment call or phone call:

-University of Bologna call on 24/05/2023.
-Confindustria Pesaro Urbino call on 31/05/2023.
-Apecchio Municipality meeting in Presence 08/05/2023.

Catchment Information

Metauro Catchment.png



Metauro Catchment 1.png

Catchment Information

The Galvanina site to which this AWS relates is "Val di Meti"; mineral water, natural and sparkling, and flavored waters, both in glass and plastic, are produced and bottled here. The plant is located in the valley of the same name in the municipality of Apecchio, province of Pesaro-Urbino, Marche, Italy. The address is Zona Pian di Molino Loc. Caselle, 61042 Apecchio (PU). The building includes areas for raw material storage, bottling, packaging, and shipping, and areas for office activities. Outside the building, but still within the property perimeter, are storage silos for incoming water and the outgoing wastewater treatment plant.

The AWS operation system includes the water resource abstraction areas (springs and wells), the pipeline systems connecting the catchments to the plant, the production plant, and the point of discharge of wastewater into surface water bodies.

The physical hydraulic infrastructure is composed by:

-Intake and pipeline works: there are two intake springs and four wells. The oligomineral spring from which Galvanina draws its water is called Val di Meti and flows naturally from Mount Carda, a rocky outcrop on the west side of Mount Nerone, about 700 m above sea level. Galvanina draws water from this spring at two separate points (S1 and S2). Here the water resource is simply "collected" by fall, conveyed to a sedimentation tank and pushed against gravity (S1) or by a system of pumps (S2) to the plant. Another source of the same mineral water is a well about 50 meters deep, located approximately 1km downflow of the plant, made of stainless steel (well 3 or P3) mainly kept as a “spare” source in case of any problem in the two main springs.

S1,S2 and P3 fall within the same mineral water mining concession area called "Val di Meti," with a total extension of one hundred hectares. At the level of infrastructure ownership, all works falling within the mining concession (springs, wells, pipelines, storage silos) are unavailable state property. In compliance with the requirements within the aforementioned mining concession, Galvanina performs the measurement of the flow rate of individual springs and wells every year in the presence of an official of the competent service of the Area Vasta 1 Territorial and pays the Marche Region the annual fee for the use of the existing catchment works in the mining concession.

The maximum limit of abstraction from the catchments is 18 L/s total, as per the mining concession, but the actual average flow rate is about 10 L/s; therefore, there is no evidence of a risk of excessive pressure on groundwater and springs. The connection between the sources and the plant is made with pipelines without branches.

-Wells for service water: they are called "purifier well," "canopy well," and "house well"; they are located near the building. The pumped water comes from the sub river flow of the nearby Biscubio Creek, comparable to a surface water withdrawal, and is therefore authorized with the so-called Derivation Directive. This water is a limited quantity used only for industrial use.
-The two discharge flows (industrial treated wastewater and rainwater) are connected to the Biscubio Creek. In the WWTP a chemical + biological process purifies the industrial water (mainly from unbottled water, water from bottle washing, plant cleaning, and toilets) before discharge. To date, no recirculation of treated wastewater is done. Rainwater runoff from yards and roofs is collected and discharged directly into a ditch that drains into the Biscubio Creek.
-The plant does not have a public aqueduct connection.

The "AWS catchment" starts up flow on the recharge area and ends downflow at the confluence of the Biscubio Creek (average 2m3/s) into the Candigliano River (average 10m3/s), belonging to the catchment area of the Metauro River (average 20m3/s), which flows into the Adriatic Sea. In between La Galvanina direct influence starts at the limited area defined by the concession for water resource abstraction areas (springs and wells), the pipeline systems connecting the catchments to the plant, the production plant, and ends at the point of discharge of wastewater into the Biscubio creek (0,0005m3/s).

Client Description and Site Details

Site Boundaries La Galvanina.png

Site boundaries, water sources and effluent.png

Water Sources.png

Site.png

Client/Site Background
The production on-site mainly consists of:

-Silos: outside the plant, oligomineral water is collected in storage silos (6 larger ones for bottling water and 3 smaller ones for service water), which act both as lungs for production and as pressure reservoirs; with the help of suitable pumps, the water is relaunched from the silos inside to the bottling plant.
-Production (bottling and warehouse): inside the plant, there is a bottling plant (with differentiated lines for glass and PET), which also includes bottle-washing operations.
-Wastewater treatment before discharge: all kind of wastewater (unbottled water, water from bottle washing, plant cleaning, and toilets) is collected and sent to the treatment plant located next to the main building. The treatment plant is a mixed chemical-biological type and consists of the stages of screening, equalization, pH neutralization, primary sedimentation, activated sludge biological oxidation, final sedimentation, and sludge regeneration.

La Galvanina has installed flow meters in the Val di Meti plant that can monitor the amount of water emitted and collected from wells and springs on a daily basis. By having, in addition, a flow meter also in output, at the level of the inlet to the treatment plant and monitoring the amount of bottled water, it is able to estimate the plant water balance.

The workforce of the production site is approx. 38 internal + 10 external workers.

La Galvanina has been assisted with the preparation of its system by Spinlife (a spin-off of the University of Padua founded by prof Scipioni).The consulting company provides tailored consulting plans regarding strategic environmental management and sustainability management techniques. Spinlife mainly operates in three broad areas:

-Life Cycle Assessments
-Business sustainability services
-Carbon strategy

Summary of Shared Water Challenges

Summary of Shared Water Challenges
Some of the shared water challenges are:

-Creating and maintaining a corporate culture that promotes socially and culturally equitable, environmentally sustainable and cost-effective water use (intenal stakeholders)
-Compliance with legislative requirements; informing the public about respect for the land (Municipality of Apecchio).
-Promotion of quality content among members to the association (Cofindustria).
-Connecting university and enterprise (University of Bologna).
-Efficient water resource management processes to minimize waste (suppliers).
-Preservation of natural heritage through the supply and rational use of water resources (Marche Land Reclamation Consortium).

0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	*Eligibility Criteria*	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site is located in Metauro Catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	La Galvanina site consists of: -Two intake springs and one well of oligomineral water. -Intake pipelines from the sources to the production site. -One production site (including inlet water tanks, bottling plant, in/out warehouse, external area, WWTP, and three service wells).	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The site "Val di Meti" is managed under a single "site-based" management system which has been developed taking into consideration the general policy of the group La Galvanina S.p.A. It is planned to include two other production plants "Galvanina" and "San Giuliano" in the scope by 2025.	

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	✓ Yes
Comment	The site has presented the following maps: -Map showing the boundaries of the area relevant to the site's water stewardship actions and engagement. -Geological map. -Hydro geologic map of the source respect area (larger than the one under Galvanina's control as there are also other sources managed by third parties as Marche Multiservizi, the local public potable water provider). -Cadastral maps of the existing concession (35 Ha) and the one under study for expansion (65 Ha). -Planimetry of the plant sanitary water system. -Planimetry of the plant rainy water sewer networks. -The site's catchment/s is fully identified and mapped. -Discharge point and ultimate receiving water body are mapped in evidence provided in criteria 1.5. The catchment is formed, upstream of the production site, by the recharge area of the springs and the mineral water well and, downstream, by the stretch of the Biscubio stream between the point of discharge of wastewater leaving the treatment plant and the point where the Biscubio flows into the Candigliano River.	
1.2	*Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*	
1.2.1	*Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* *- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;* *- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;* *- Provide evidence of stakeholder consultation on water-related interests and challenges;* *- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;* *- Identify the degree of stakeholder engagement based on their level of interest and influence.*	✓ Yes

Comment

The site has evaluated and identified the main stakeholders of its water-related challenges:

-4 in the Trade union (3 workers representatives)/1 employee association.
-4 within the communities (1 neighbor – a brewery; local population; 2 universities with which they have relationships regarding projects on food standards and bottled drinking water analysis).
-14 from public bodies (administrative, environmental, and H&S safety control bodies, at municipal and regional levels).
-4 within direct management (company investors, top management, internal auditing, workers).
-3 in commercial relationships (suppliers, clients,s and final product consumers).

They are mapped in the Stakeholders, sfide, rischi e opportunità table.

The local population is a stakeholder figure who suffers the consequences of la Galvanina's activity in a very limited way.

Withdrawal of water upstream: La Galvanina is authorized to exploit two springs in a large hilly area that is rich in other sources which are not exploited and feed the natural outflow of the streams which run through the valley.
Restitution of water downstream: the quantity of purified and in any case, non-polluting waste water returned to the Biscubio stream (later Candigliano) is negligible compared to the flow of the rivers.

All stakeholders, based on Galvanina's prior stakeholder knowledge and/or specially collected feedback, are associated with any shared, water-related challenges. Based on the required engagement and the shared challenges identified, specific engagement actions are drafted. Each stakeholder, in addition, is associated with one or more risks or opportunities related to water management. Each risk or opportunity is evaluated on the basis of the Probability of the potential event becoming a reality and the Magnitude of the impact that would result. The two indicators are combined by a product to assess the resulting significance of the risk or opportunity (Significance = Probability x Magnitude). The results have been evaluated at a Site Management level and approved in the Water Team meeting date April 6, 2023.

The stakeholder consultation was carried out primarily through the dissemination of a company notice regarding the launch of the AWS program and the presentation on the company website of the initiative.

The level of stakeholder engagement is taken up by the organization based on feedback received. Actions taken to date: for example, the meetings with the Apecchio schools have been highly appreciated by the Municipality.

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*

Obs.

Comment

The Stakeholders are mapped in the SH document listing for each stakeholder, how they are linked to the organization, any water-related concerns or challenges they face, and a summary of communications with them.

The action plan, called "Water Stewardship Plan" is created by RAWS (Responsible for WAS) and shared with Galvanina's management. For each goal, practical actions are defined so that their completion leads to the achievement of the set goal and contributes, in general, to improve the management of the water resource. The objectives and actions are defined in such a way as to reflect the materiality analysis of stakeholders and therefore act mainly, but not exclusively, on those for whom the required involvement was found to be "Moderate" or "Advanced."

To assess the appropriate level of stakeholder involvement to be implemented, a level of interest and influence on water-related challenges is assigned and the two aspects are combined through a product (Required Involvement = Interest x Influence).

All stakeholders, based on Galvanina's prior stakeholder knowledge and/or specially collected feedback, are associated with any shared water-related challenges. Based on the required involvement and shared challenges identified, specific engagement actions are drafted. Each stakeholder, in addition, may be associated with one or more risks or opportunities related to water management. Each risk or opportunity is evaluated on the basis of the Probability of the potential event becoming a reality and the Magnitude of the impact that would result. The two indicators are combined by a product to assess the resulting significance of the risk or opportunity (Significance = Probability x Magnitude).

Current degree of influence has been identified, however the potential degree of influence in water stewardship between the site and stakeholders within the catchment, has not been identified.

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1 *Existing water-related incident response plans shall be identified.* Yes

Comment

As part of its management system 14001, the site adopted a procedure P EME 2 on how to assess and manage environmental damages, if the event is potential to contaminate the site or if historical contamination is discovered (e.g., substance spills). The mode of management is in accordance with the Italian mandatory requirements that define different levels of external communication and self-reporting with the environmental control agency in charge.

Moreover environmental emergency management procedures are in place, with the purpose of defining how to handle an event to minimize the consequences of the event or contamination found and to coordinate emergency services, personnel, and management. The scope of the procedures is limited to the plant; there is currently no contingency plan for water withdrawal areas where a safety and health document (DSS) covers the risk specific to the mining sector, compulsory by law. The latter covers all activities within a radius of 200 m (source protection area) from the extraction point.

The environmental emergency taken into consideration for the plant is chemical spills. Last drill was was on September 14, 2022.

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

Comment

The Site uses a water chart containing data referring to one solar year 2021 and 2022.

The inlet:
-The springs with a variable flow of which only a part is used (measured) for production while the overflow is directly discharged to nature.
-Since the natural water flow, cannot be modified, once the reservoir is filled at 100 percent, the excess water that flows from the spring simply skims over and returns to the overground natural water collecting system. This excess is called "overflow". There are instantaneous flow meters without totalizer at the springs; the sensors are located upstream of the filling tank and therefore it is not possible to separate the flow of water that returns directly to nature from the amount that is piped to the plant and their totalized. Within the perimeter of the building, the "overflow" system of the raw water tanks is also active: when the volume of water exceeds the amount needed for production, the excess water is skimmed off into the rainwater sewerage system, along with the runoff water. A flow meter is not available for this discharge due to structural impediments.
-Collecting system (not measured).
-Well and industrial wells (measured).
-Rainwater not reused (estimated).

The outlet:
-Bottled water (measured).
-Treated water from WWTP (measured).
-Discharge of rainwater (estimated).
-Evaporation is considered negligible (related only to rainwater).

Water storage components (such as pipes, storage tanks, and reservoirs) are connected in process, related to a negligible quantity as compared to annual consumption, and can be considered unchanged during the whole period of time.

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 provided data for 2021 and 2022.

Galvanina has installed flow meters in the Val di Meti plant capable of monitoring the amount of water pumped and collected from wells and springs on a daily basis. Furthermore, by having a flow meter also in the effluent, at the level of the entrance to the purifier and monitoring the quantity of bottled water, it is possible to estimate the water balance of the plant.

It is important to point out that the maximum limit of abstraction from the catchments is 18 L/s total, as per the mining concession, but the actual average flow rate is about 10 L/s; therefore, there is no evidence of a risk of excessive pressure on groundwater and springs.

Galvanina monitors the quality of the water leaving the purifier, to check that all the parameters are below the limit threshold for discharge into surface water. The impact of these quantities is negligible on the water catchment balance.

Among the goals of Galvanina's 2021-2025 sustainability plan is to improve the efficiency of the Val di Meti plant, aimed at maximizing valuable output, namely bottled water. The Kpi is the water efficiency rate given by:

WER = (bottled water + process discharged water)/(bottled water)

The KPI is:
2021: 1,202
2022: 1,188

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.*

Obs.

Comment

The site periodically realizes analysis of the mineral water coming from wells and sources: these analysis 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.

Controls of chemical-physical and microbiological parameters and flow rate are regulated under the Quality Management System. In general, the following controls, are carried out:
-On S1 and S2, microbiological and chemical-physical analysis and flow rate control in L/s on a weekly basis.
-On P3, microbiological and chemical-physical analysis on a weekly basis.

Other waters from industrial wells are also under control before use in the plant.

The site performs an analysis of its industrial wastewater after the WWTP. The site complies with the legal limits defined in the discharge permit AUA. On the WWTP discharge, monthly chemical self-control (sampling and laboratory analysis carried out internally by La Galvanina), accounting of the total volume of effluent discharged on a monthly basis in m3, annual microbiological analysis (sampling carried out by Galvanina according to an internal procedure, laboratory analysis carried out externally).

According to the AUA authorization, the following parameters must be analyzed once a year: pH; coarse materials, sedimentable solids, total suspended solids, Biochemical Oxygen Demand (BOD5), Chemical Oxygen Demand (COD), chlorides (chloride ion), total phosphorus (as P), ammonium nitrogen (ammonium ion), nitrous nitrogen (as N), nitrate nitrogen (as N), surfactants total, total nitrogen (as N).

All data for 2022 and 2023 are far within the limits.

The plant has other water discharge points, which require attention: rainwater comming from the building roof, car park area, truck waiting and loading area, uncovered waste deposit. The discharge point is not subject to a specific legal permit but water might potentially be polluted due to potential pollution. This point must be taken into consideration and monitored. The site discharges the rainwater into the river.

The site has not quantified the risk related to potential pollution in terms of quality and quantity. This point might be a threat to good water quality status for people or environment and it's also linked with indicator 1.3.5.

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

in progress

Comment

Galvanina has identified the accidental spillage of chemical products as the main source of potential pollution (see EMS 14001 documents). To reduce the risk, the chemical products are grouped together in the storage warehouse and placed above suitable collection basins; the containers for the aromas are stored outside the building in a polar box; waste deriving from chemical products is located in the temporary deposit and accompanied by a containment basin. There are also absorbent kits (sheets, pillows, cuttlefish, etc.) for the immediate management of any emergency. The aspect register is updated and the pollution source mapping document with the index adequately covers the requirement of this indicator.

A map with the location of the deposit of chemical product is also present.

The site discharges the rainwater into the river: this water is flowing from the car and truck parking area, from the site's external roads, and from a dangerous waste deposit partially not covered. The site has not identified this as a potential source of pollution. This point is linked with indicator 1.3.4.

Preventive action/potential improvement point: The site has not evaluated the possible substitution of some dangerous products for other more eco-friendly ones to reduce the presence of potential pollution sources. The list of chemical substances commonly used in the site during production and cleaning contains products marked as dangerous for the environment.

Finding No: TNR-004670

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 has identified and mapped the IWRA's as areas related to the hydrogeological and hydrological basin pertaining to the concession. A description of the status of the IWRA's was provided.

The external areas are the S1 and S2 sources and the P3 well from which it obtains its water supplies. They are located into the following areas:

• Natura 2000 Code: IT5310017 - Monte Nerone - Gorgo gorge in Cerbara - ZSC/SIC area
• Natura 2000 Code: IT5310018 - Serre del Burano - ZSC/SPA area

The on-site IWRA's include other areas of importance: the flood risk areas that lie on the site of the river branches. The Val di Meti plant is part of a floodable plain, according to the map of the Hydrogeological Asset Plan (PAI) of the District Basin Authority of the Central Apennines, however, the area of the Biscubio stream and neighboring stretches, in the Plan of Flood Risk Management (PRGA) of the Marche regional basins, are not affected by structural measures intended for high-risk areas.

In order to respect the aforementioned habitats, Galvanina complies with prohibitions and obligations of point 5 of DGR 1471/2018 of the Marche Region, regarding SPAs characterized by the presence of river environments. In general, the company respects the areas in question by acting in accordance with the requirements of the mining concession, the Single Environmental Authorization to other applicable environmental legislative requirements (see EMS).

In addition, as far as service water wells are concerned, it should be mentioned that the "purifier well," as a sub□bore well equated with a surface water body, has undergone the environmental risk assessment related towater derivations (see "Directive for the ex ante environmental assessment of water derivations in relation to the environmental quality objectives defined by the Management Plan of the Central Apennine River Basin District"). It was found that the aforementioned derivation does not interfere with other derivations for drinking water use, is not subject to compliance with the Minimum Vital Flow (since it has a flow rate of less than 2 l/s) and is compatible with the chemical and ecological status of the water body (Biscubio River Section 1 C.I._A).

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

Obs.

Comment

The site includes a list of annual water-related costs, revenues and description of social, cultural and environmental value generated related to the water management, by the site to the catchment in the document “AWS handbook”. On the other hand, the economic savings deriving from the efficiency of the water resource are not quantified, as they are considered negligible.

No all data is up to date, there is data from 2021, for example: variable costs of maintenance of water infrastructure and products shipped by Val di Meti. There is not estimation of the variable budget allocated to the AWS project.

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

No

Comment

At La Galvanina plant, where about a hundred workers are employed, well water is used as service water for drinking purposes and is available in toilets for both staff and visitors. The quality is considered good, being the water coming from the same underground origin as the bottled water. Only the bottled water is covered by continuous monitoring.

To avoid waste, all toilets are equipped with double-button flushers and all sinks are equipped with photocells.

Since the Covid-19 pandemic period, there is signage in the company regarding proper handwashing; there are also hygiene signs in production departments related to HACCP procedures.

Compliance with the requirements related to discharges is crucial for La Galvanina, since the water from the Biscubio, after flowing into the Candigliano River and subsequently into the Metauro, is captured and destined for drinking use.

Dressing rooms including sinks, WC and showers are provided divided by gender, located both in the production and office area. The number is higher than required by H&S law. The number and quality of service room was checked during the site visit by the auditor.

However, there is no evidence of identification of the levels of access and adequacy of WASH at the site.

Finding No: TNR-005348

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

Galvanina has conducted a preliminary Organization Water Footprint study, concerning the Val di Meti plant, to assess the potential environmental impacts on the water resource, resulting from its direct activities (energy consumption, air, and water emissions, waste generated) and indirect activities (transportation into the plant, procurement of raw materials, distribution of finished products).

There are no suppliers of goods or services in the relevant catchment area. In addition to what has just been described, the chemical analysis of wastewater, exiting from the sewage treatment plant located in the company, was also taken into account. The Water Footprint study carried out was prepared by ISO 14046, ISO 14040, and ISO 14044.The study is attached as evidence.

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

Comment There are no suppliers of goods or services in the relevant catchment area.

The water consumption of internal plant service (laundry, canteen) is neglectable in quantity and already taken into consideration in the general service water of the plan.

The site has started a wider Water footprint study in the Water use category and with reference to 2021 data, the main impact is from packaging (91 percent), which includes PET preforms (about 3 million kg), glass bottles (about 1.5 million kg), caps and labels; the impact associated with preforms is 78 percent, however, the value of uncertainty is very high.

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

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* Yes

Comment Catchment water governance is strictly regulated and controlled by government agencies, institutions, and other organizations. It includes water resources management, protection, allocation, monitoring, quality control, treatment, regulation, policy, and distribution. The institutions ensure responsible governance, policies and frameworks for sharing of water resources in the interests of users and the natural environment in line with the principles of water stewardship and society's goals.

The site has implemented a system to understand and share the above matters and consider them as a starting point to define its risks and opportunities.

The more important institutions which are considered in the stakeholder's lists and their main involvements are:

COMUNE DI APECCHIO-Control of the territory of competence, communications with the citizenship.
PROVINCIA DI PESARO URBINO-AUA release.
REGIONE MARCHE -Water Protection Plan.
UNIONE MONTANA DEL CATRIA E NERONE-Management of Natura 2000 sites.
CONSORZIO BONIFICA MARCHE-studies for the mitigation of hydrogeological risk.
AUTORITÀ DI BACINO DISTRETTUALE DELL' APPENNINO CENTRALE -Drafting Management Plan of the Central Apennines Hydrographic District (PGDAC), Flood Risk Management Plan of the Central Apennines Hydrographic District (PGRAAC), Plan for the Hydrogeological Structure PAI) Marche. Information bulletin of the observatory. Status of water resource and water severity.
ARPAM -agenzia per la protezione ambientale Marche-Quality report of river water bodies Groundwater report.

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 developed a comprehensive legal register and has the assessment of its compliance with legal and regulatory requirements yearly according to the requirement of its internal management ISO 14001 system. The register is continuously updated by the external consultant and any change is internally evaluated for consequent actions.

Special focus is always given to the mineralized water concessions abstraction (for production) and wastewater discharge quality (regulated by permit).

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

Yes

Comment

The site included in its AWS manual an evaluation of the general flow of the catchment with a general evaluation of precipitation, point source flows, wells flow, subsurface flow runoff, and hydrogeological characteristics. Most data on the whole catchment is not available and is out of the control of the company.

The study is mainly focused on the connection between the hydrogeological sources of the springs and the source of Biscubio Creek, which could bring consequences on the oligominarale characteristics of the bottled water. Another point is the minimum vital runoff of the creek and its possible interference with the well P3.

The whole catchment area doesn't have scarcity/drought problems.

A tentative catchment water balance gives the following results:

-Average annual rainfall: about 1100 mm.
-Average infiltration over the basin: 15-18%
-Basin area: estimated 6.74 sq. km
-Total balance value: about 17-20 L/s
-Share of infiltration: 2/3-1/2 → Average annual infiltrated water in the basin: about 665,000 cu m.
-Share of lateral outflow (for 'hanging' aquifers and lateral perennial aquifers, present at elevations above 600m): 1/3-1/2 → Surface runoff: about 665,000 cu m in the range of 10 L/s.

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 quality of the water in the whole catchment is good and there are no water quality issues/challenges in the catchment.

Water quality data for the catchment are obtained from various sources such as regulators, environmental agencies, and academic studies.

The current groundwater status is evaluated by ARPAM, both quantitatively and qualitatively, from a chemical standpoint. Individual water bodies are accordingly distinguished into Good or Poor status classification. The monitoring carried out by ARPAM, both for the three-year period 2015 - 2017 and for the three-year period 2018-2020, shows a "good" chemical status index (SCAS) in the source recharge area.

At the level of monitoring the health status of the water body, the Biscubio stream is currently classified with a "good" ecological state and a "good" chemical state, which is the best state for both scales.

All mineralized waters are kept under strict control for production quality control; the wastewater treatment plant outlet is also periodically controlled according to the discharge permit regulations and more frequently analyzed with a kit method. All data are carefully recorded and monitored.

The site analyzes chemical parameters on all the industrial wells yearly.

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

Comment

Areas of importance related to the water compartment include Sites of Community Importance (SCIs), areas identified on the basis of the Habitats Directive 92/43/EEC, designed to ensure the conservation of species and habitats are defined. There are no threats to people or the natural environment and the areas have been mapped.

-The Area of Community Importance "Monte Nerone - Gola di Gorgo a Cerbara" covers an area of 8155 ha in the province of Pesaro and Urbino between the municipalities of Cagli, Urbania, Piobbico, and Apecchio; the site is included in the SPA IT5310030 "Monte Nerone and Monti di Montiego". It is a mountain complex of relevant biogeographic interest and represents the northernmost edge of the limestone ridge of the Umbria-Marches Apennines. Some examples of the typical environments of the range can be found there are: from hilly forests to beech forests, from mesophilic to xerophilic grasslands to rocky areas and hypogean complexes. Of great scenic and ecological value is the Gorgo Gorge in Cerbara incised by the Candigliano River. Habitats present related to the water compartment: 3270 - Rivers with muddy banks with Chenopodion rubri p.p. and Bidention p.p. vegetation.

-The Site of Community Importance "Serre del Burano" covers 3720 ha in the province of Pesaro and Urbino between the municipalities of Cagli, Apecchio and Cantiano. The morphology is mostly hilly. The marly arenaceous substrate favors the spread of a wide forest cover, characterized by acidophilous forests, mostly of turkey oak, typical of the central-northern Apennines among which the Tecchie Forest stands out; in the lower areas there are significant portions of rural landscape. Important area for forest species, in particular the very rare Middle Spotted Woodpecker is reported, although not recently. Habitats present related to the water compartment: 3270 - Rivers with muddy banks with Chenopodion rubri p.p. and Bidention p.p. vegetation.

In order to respect the water sources of the aforementioned habitats, Galvanina complies with the prohibitions and obligations of point 5 of DGR 1471/2018 of the Marche Region. In general, the company respects the areas in question by acting in accordance with the requirements of the mining concession, the Single Environmental Authorization to other applicable environmental legislative requirements.

Finally, other areas of importance related to the water sector are the flood-prone areas bordering river courses. The Val di Meti plant falls within an overflowable plain, according to the map of the Plan for Hydrogeological Structure (PAI) of the Central Apennine District Basin Authority, however, the area of the
Biscubio Torrent and neighboring stretches, in the Flood Risk Management Plan (PRGA) of the UoM regional basins of the Marche region, are not affected by structural measures intended for high-risk areas.

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

Yes

Comment

Within the catchment area of reference, the water related infrastructure is managed by Marche Multiservizi Spa as part of the integrated water service, namely a water network of about 5,000 km, sewage networks for about 2,000 km and 107 sewage treatment plants for urban wastewater treatment.

The infrastructure condition and potential exposure to extreme events has been identified.

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

Yes

Comment

The availability of potable water for the local population is guaranteed by the public service (Marche Multiservizi). The same public company provides the sewerage connection to all private and industrial sites and wastewater treatment. Evidence was provided in indicator 1.5.6 (Repor Sostenibilità 2021, Marche Multiservizi Spa, MMS).

MMS manages the integrated water service consisting of waterworks, sewerage and purification: three activities essential to the lives of citizens and the development of the territory, merged in a point management. Through a water network of about 5 000 km, it supplies more than 32 million cubic meters of water whose quality is guaranteed by its own specialized laboratory.

The operation and maintenance of about 2 000 km of sewer networks, allows the constant collection of urban wastewater of civil origin then treated in the 107 purification plants managed, which allow water to be reintroduced into the environment in an environmentally friendly manner.

The level of sanitation and hygiene in the catchment is high according to the Italian standard regulated by law. MMS is present in the management of water service in 47 municipalities, for a catchment area users of about 275 thousand habitants served and, through the supply of drinking water to Aset S.p.A, provides for the needs of almost of the entire province of Pesaro and Urbino (more than 350 thousand habitants).

With a sewerage network of about 2 000 km, the coverage of sewer service is equal to 90 percent of the territory's needs (population equivalent), while the sewage service covers 82.5 percent of the equivalent habitants, up one percentage point from 2020. The sewage service is managed through 107 purifiers.

No basin issues are identified with regard to people's access to clean and sufficient water to quench one's thirst, prepare food or wash up, nor to access to toilets of decent quality.

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.*

Yes

Comment

The Site included a prioritized list of their identified Shared Water Challenges:

Advance:
-Creating and maintaining a corporate culture that promotes socially and culturally equitable, environmentally sustainable, and economically beneficial water use.
-Creation and maintenance of a corporate culture that promotes socially and culturally equitable, environmentally sustainable, and cost-effective water use.

Medium:
-Promotion of quality content among association members.
-Connecting university and business
-Compliance with legislative requirements; informing the public about respect for the land
-Creating and maintaining a corporate culture that promotes socially and culturally equitable, environmentally sustainable, and cost-effective water use.
-Efficient water resource management processes to minimize waste.

For each challenge defined in the Shared Water Challenges document, consequent tables define risks and opportunities, SH expectations and actions. The identified actions to address the shared water challenges are most related to the communication outcome.

The external communication with the relevant SH are based on the adoption at the same time of the AWS Standard and the SA8000 Social Certification Program.

Evidence provided for step 3 (3 - Stakeholder, sfide, rischi e opportunità rev1.3 (1)).

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

Comment: Initiatives to address shared water challenges have been identified. Evidence provided for step 3 (3 - Stakeholder, sfide, rischi e opportunità rev1.3 (1)).

The identified actions to address the shared water challenges are most related to the communication outcome. It is recommended to extend them to sustainable water balance and good water quality status.

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: The site has identified a list of water risks related to the stakeholder analysis, some examples are:

-SH: Provincia di Pesaro Urbino which is the Environmental Control body: non-compliance with legislative requirements (therefore the risk of fines or production block)(physical).
-SH: Autorità Di Bacino Distrettuale Dell' Appennino Centrale: risk of excessive exploitation of aquifer (physical) and flood risk on site (physical).

The measures in place are considered efficient to reduce the risk to acceptable and no new action is planned as an improvement.

Water risks have been prioritized, including likelihood and severity of impact, potential costs and business impact.

Evidence provided for step 3 (3 - Stakeholder, sfide, rischi e opportunità rev1.3 (1)).

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* No

Comment: Some of the water opportunities related to the stakeholder analysis identified by the site are:

-Reduce business costs by making water management more efficient.
-Increase the level of detail on water balance data.
-Improve Galvanina's image to the outside world.
-Sales of products with voluntary certification expanding in the market.

Water-related opportunities have been identified, including how the site may participate, prioritization of potential savings and business opportunities. However, it is not clear how the assessment of these opportunities will be done.

Evidence provided for step 3 (3 - Stakeholder, sfide, rischi e opportunità rev1.3 (1)).

Finding No: TNR-005342

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.* closed

Comment Water Governance Best Practices: BAT1, transposed through ISO 14001 EMS implementation.

It is not clear which actions from ISO 140001 certification are considered as relevant catchment best practices for water governance.

Finding No: TNR-005343

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* Yes

Comment Best practice for water balance:

-BAT2, implemented through the water balance envisaged by the AWS certification itself and by the related improvement plans.
-BAT7, implemented where possible: Galvanina has adopted some waste reduction policies over the years, making improvements such as the elimination of returnable glass (the bottle and crate washing process involved high water consumption) and the recovery of bottle rinsing water (the process consists of two steps washing, the first with ammonia and the second without; the water used for the second washing is recovered to be used during the first washing of the next batch of bottles, allowing a water saving of about 7 m3/h); photocells and double-button flushes have been installed in the bathrooms and the cleaning cycles of the systems have been optimized over time.

The Site works very closely with the local environmental authorizing entity to assure a global water balance suitable for production use but also respectful of local needs.

1.8.3 *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* Yes

Comment Best practices for water quality: BAT3 and BAT4, substantially implemented through AUA prescriptions. The possibility of intensifying the frequency of monitoring will be evaluated under AWS in the coming years.

AUA gives strict requirements on the outlet-treated wastewater analysis. Galvanina is performing analysis internally as routine control and externally as periodical official reports to monitor the quality of the treated water. In AUA a tertiary section (filtration and phosphorous removal section is given as a possible future requirement should the plan stop to fulfill the requirement or in case of change (reduction) of the concentration level of some pollutant.

BAT 3 is to monitor the main process parameters (e.g., continuous monitoring of wastewater flow, pH and temperature) at key points (e.g. at the pre-treatment inlet and/or outlet, at the final treatment, at the point where the emissions leave the installation). AUA requires frequencies and types of analysis that Galvanina wants to increase as an application of BAT 3. BAT is to monitor emissions to water at least as frequently as given in a table and in accordance with EN standards, the best practice is to foresee higher frequencies than those defined.

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

Comment Best practice for maintaining IWRAs: no specific BAT, refer to AUA requirements.

The site works very closely with the local environmental authorizing entity to assure a global water balance suitable for production use but also respectful of local needs. The AUA gives strict requirements on the outlet-treated wastewater analysis. Galvanina is performing analysis internally as routine control and externally as periodical official reports to monitor the quality of the treated water.

It is not clear which of the AUA prescriptions in terms of IWRA's are identified as best practices. Legal/regulatory requirements are not considered best practice.

Finding No: TNR-005250

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

closed

Comment

Best practice for the provision of fair and adequate WASH services: no specific BAT, please refer to the site's water infrastructure (well for WASH for use by employees and visitors).

It is not clear why the site's water infrastructure to provide water for employees and visitors is considered as best practice. Legal/regulatory requirements are not considered best practice.

Finding No: TNR-005345

2	**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Obs.
Comment	The site has published its statement on the web page: https://www.galvanina.com/wp-content/uploads/2023/04/2.1.1_POLITICA_AWS_Ed01_Rev00_06-04-2023.pdf?_gl=1*a87ahn*_ga*OTM2MTQ3OTYxLjE2ODcxNjAxNjM.*_up*MQ.. The policy is dated 07-11-2022 and signed by the previous legal representative. The new CEO from 04-05-2023 signed the Policy shown during the audit (to be published on the website). The new revision is disclosed at the site entrance but not yet in the website.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The site's chart identifies responsible persons/positions within the facility's organizational structure. A new organization chart was updated on 04-05-2023. Legal responsibilities are on the CEO with unlimited economical resources on Environment and Health and safety compliance. All legal permit and authorization on EH&SMS are in the name of the CEO; the files are prepared and the submission to the authorities are under the responsibilities of the Responsible HSE Manager. According to the job description dated 17-01-2022 for Responsible HSE Manager, is in charge of: -Assuring EHS legal compliance. -Monitor and update the legal compliance. -EMS, H&SMS and AWS. Legal Register and Legal Compliance Procedure are in place under the control of the EMS 14001 system.	
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	The site presented its Water Stewardship Plan, where the water stewardship strategy has been identified including the vision, mission and goals.	
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.*	closed
Comment	A detailed Water Stewardship Plan (rev.1) was created as part of the AWS process and approved by the AWS Committee. The plan defines for each goal: actions, KPI, starting point, periodical monitoring deadlines, review, effective deadline, target deadline, budgets, stakeholders, responsible and main AWS outcomes. Projects are managed and reported by the process owner in a separate form. For each target the timeframe and consequent intermediate evaluation of the planned activities are due on a quarterly frequency with an evaluation of the Water Team. The main projects with reference to the water outcomes are: -Good water governance: 6 -Good water quality status:1 -Sustainability water balance:2 -Important Water-Related Areas:0 -Safe Water, Sanitation And Hygiene For All (Wash):0 Two examples of actions are: -Perform chemical analysis of wastewater leaving the treatment plant and in the surface water body before and after the point of discharge to monitor and give evidence of good water resource management. Completed with positive results (no change in characteristics due to the Galvanina WWTP discharge). -Calculate the Water Efficiency indicator annually and gradually reduce it over the years according to programmed dimensionless indices. The index is in place, but there is no evidence of the detailed associated program. There are not targets and actions linked with these two AWS outcomes: Important Water Related Areas and WASH. ***Finding No: TNR-005253***	
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	For each risk identified and evaluated in the risk analysis, a mitigation action and operating control procedure also according to the 14001 EMS system is defined. For example: -Risk: reputational impact of events associated with environmental disasters. Action: maintenance and improvement of the environmental management system. -Risk: investments associated with infrastructural adjustments necessary and prescribed by environmental legislation and by the local authorities (considered as SH). Action: The ability to plan investments in the context of the management review of the environmental management system combined with constant relations with the local authorities, who are the promoters, in the context of the update of the integrated environmental permit, of the infrastructure investments aimed at compliance with the requirements set out as BAT, makes it possible to make investments economically sustainable and capable of ensuring environmental infrastructural compliance.

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts

3.1 *Implement plan to participate positively in catchment governance.*

3.1.1 *Evidence that the site has supported good catchment governance shall be identified.* — Yes

Comment

The Site has taken many steps to establish good relations with catchment authorities and SH: meetings, presentations, technical sessions, shared projects.

From the Water Stewardship Plan, the following activities are linked with the good water governance outcome:

-Plan and execute training events for employees on AWS and its founding principles: done in February 2023.
-Creation of the Water Team responsible for planning and design of improvement goals on the water resource: done in December 2022.

Some examples of other activities are:

-University of Camerino: cooperation and study on the quality of the oligomineral water from springs.
-University of Bologna: cooperation on the program on the Food sector.
-Municipality of Apecchio: compliance with legislative requirements; information of citizens on respect for the territory.

Future activities:

-Municipality of Apecchio: development of a pedestrian trekking route called water trails within the concession area, accessible to the public.
-Confindustria: organization of a conference in September on sustainability with a special focus on water resource protection.

This approach was confirmed in the stakeholder interviews.

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* — Yes

Comment

The site regularly monitors the quality of the water effluent and the parameters are complying with limits.

The site is not over extracting water, they are respecting the concession limits.

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.* — No

Comment

The site has developed a comprehensive legal register for EMS 14001. Every year an internal audit on legal compliance is performed (as a requirement for the 14001 certifications). The external auditor is qualified for EMS 14001.The third-party SGS certification audit, can't be considered a legal compliance audit, it gives anyhow an evaluation of the compliance level and management system to fulfill the legal requirements.

The main environmental authorization in place (AUA) is relating to the authorization to discharge the purification plant: obligations are defined for the operation and monitoring of the plant, in addition to the chemical, physical, and biological concentration limits for discharge into surface waters.

The WWTP operation and maintenance audit does not cover some requirements contained in the AUA permit as the planning of maintenance activities and the periodical monitoring of the total flow in order to confirm the max total volume of treated water allowed per year (i.e: water balance vs AUA).

The site used the process to verify legal and regulatory compliance already in place for ISO 14001, but the requirements related to AWS System and water rights are not covered.

The check list used to demonstrate the legal compliance (used for legal compliance for EMS certification) doesn't cover:

-AUA requires the planning of maintenance activities and the periodical monitoring of the total flow to confirm the max total volume of treated water allowed per year. The site doesn't have an internal procedure and record to cover this requirement.

-AWS general requirements as voluntary system adopted by the site, internally becomes equivalent to legal obligation and therefore must be taken into consideration according to 14001.

Finding No: TNR-004674

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

The water rights of people external to the site (within the catchment) are guaranteed by law and run by public service. The influence of La Galvanina can only be related to the correct management of environmental requirements contained in the AUA or in other environmental aspect and requirements identified though its internal system.

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

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

Comment

The due date for water balance targets is December 2023. Actions are in progress.

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* Yes

Comment

The site is located in an area that is not considered scarce in water. However, the site has set targets to reduce water consumption annually, the water reuse plan in the glass bottle washing plant, and improve the ratio of bottled water/industrial water discharged.

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 The Minimum Vital Outflow relating to the hydrographic basin underlying the mineral springs was assessed, to verify whether the conditions of potential interference existed from the use of the Val di Meti natural mineral water spring, on the chemical-physical and biotic structure of the surface outflow of the area of hydrogeological interest.

The surface drainage network (springs and lake) reaches the bed of the Biscubio stream, fed by the discharge of the natural body of water.

The assessment of the Minimum Vital Outflow was performed using the specifications referred to in the PTA Water Protection Plan of the Marche Region. In correlation to the assessment of the DMV (1.41 L/s), the average annual flow rate of surface outflow of the Fosso di Cerasa, at the closing section of the Val di Meti mineral water spring. The surface runoff value obtained of about 10 L/s on an annual average is clearly higher than that obtained from the calculation of the DMV (1.41 L/s).

Above all, the surface outflow value is conservative, since the underground water flows inside the Cerasa River basin and comes to light at other spring points of the Val di Meti springs complex.

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.* Yes

Comment Water quality entering the site from sources and well is kept under continuous monitoring for production quality control.

Water quality from the WWTP effluent is measured in quantity and periodically tested (for the main parameters with a kit) by the internal laboratory and once a year (or during unannounced visits) by the official Environmental Agency. The limits defined in the permit have been always respected.

Refer to evidence provided for indicator 1.3.4.

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.* Yes

Comment One of the requirements of the AUA environmental permit for the WWTP is the provision for the inclusion of tertiary treatment downstream before final discharge in the event of a change in outlet water quality. Since the discharge currently fully complies with the required limits, there are no plans for changes.

There are not shared water quality challenges.

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.* closed

Comment Some important water-related areas have been identified within the catchment and specific action implemented for stakeolders involment and sharing.

It is not clear which practices the site will implement to maintain and/or enhance the Important Water-Related Areas. Refer to indicator 2.3.2, there are not targets/actions linked to the IWRA's outcome.

For example: the actions that La Galvanina is planning to support the project Natura 2000 are not defined and managed with the tools defined by the system.

Finding No: TNR-004677

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*

in progress

Comment

The drinking water is available to everybody throughout the site with local dispenser feeds with bottled controlled water.The number and quality of service room was checked during the site visit.

The water distributed as drinkable inside the company toilets is classified as industrial, coming from the three wells on the site.

Monthly monitoring is carried out on these waters to check their parameters versus the requirements of industrial water (to be used for production services such as glass returnable bottle washing before reuse). According to Italian law at their use of any water is potable (see monitoring plan 3.6.1 TAB 7506 VDM control plan(1)) must be proved with an official certification of drinkable water which is not available. This is a formal legal requirement although there is no evidence that the distributed water from industrial wells is not drinkable.

There are not targets set for WASH in the Water Stewardship Plan, refer to 2.3.2.

Finding No: TNR-004678

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

Yes

Comment

Since the discharge currently fully complies with the required limits, the site is not impinging on the human right to safe water and sanitation of communities through its operations.

This is crucial for La Galvanina, since the water from the Biscubio, after flowing into the Candigliano River and subsequently into the Metauro, is captured and destined for drinking use.

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.*

Yes

Comment

There are no suppliers of goods or services in the relevant catchment area.

However, the site has started a project to Improve the accuracy of Water Footprint calculation (set in the Water Stewardship Plan): sending questionnaires to suppliers to increase the level of data accuracy to lower the coefficient of variation in calculating the plant's Water Footprint. Due date: december 2023.

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.*

Yes

Comment	Inside the plant, a cleaning company and one for the management of warehouse handling, operate as suppliers on a permanent basis. In the training sessions on AWS of 29-11-2022/09-02-2023/15-02-2023, external personnel were involved.	
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	The site doesn't share any water-related infrastructure.	
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.*	in progress
Comment	Refer to indicator 1.8.1. It is not clear which actions from ISO 140001 certification are considered as relevant catchment best practices for water governance. Thus, there is no evidence of implementation of these. ***Finding No: TNR-005349***	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	BAT2, implemented through the water balance envisaged by the AWS certification itself and by the related improvement plans. Several actions have been put in place to assure a more accurate set of data to improve the water balance and have evidence to demonstrate best practices in achieving targets in the water balance: -Installation of a rain gauge for improvement and mass balance data; action included in the Water Stewardship plan and completed in December 2022. The data will be used for improve the site water balance and will be also useful to evaluate the forecast for Biscubio stream and neighboring stretches, in the Plan of Flood Risk Management (PRGA). -During the next (due three times a year) Water Team meeting, a deep analysis of the BAT 7 is planned to define any specific point.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes

Comment

No action can be taken on the quality of the mineral waters at the sources: the constancy of the chemical and microbiological characteristics of the waters is one of the strengths of the sales of mineral waters.

Best practices for water quality: BAT3 and BAT4, substantially transposed through AUA prescriptions. The possibility of intensifying the frequency of monitoring will be evaluated within the AWS system in the next few years. In details:

BAT 3. With regard to emissions to water identified as relevant in the inventory of wastewater streams (see BAT 2), BAT is to monitor the main process parameters (e.g. continuous monitoring of flow, pH and wastewater temperature) at key points (e.g. at the pre-treatment inlet and/or outlet, at the final treatment inlet, at the point where emissions leave the installation).
BAT 4. BAT is to monitor emissions to water at least with the frequency given below and in accordance with EN standards. If no EN standards are available, BAT is to apply ISO standards, national standards or other international standards which ensure that data of equivalent scientific quality are obtained.

The water team in cooperation with the site technical manager is always working to implement the best practice for water management (the main focus is on the quality of treated wastewater).

The main project related to the quality of the water used for the production (bottled water) is run in cooperation with Universities and their laboratories.

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.*

in progress

Comment

The best practice concerning the IWRA can be considered covered by the correct management of all the AUA requirements.

The site works very closely with the local environmental authorizing entity to assure a global water balance suitable for production use but also respectful of local needs. The AUA gives strict requirements on the outlet-treated wastewater analysis. Galvanina is performing analysis internally as routine control and externally as periodical official reports to monitor the quality of the treated water.

It is not clear which of the AUA prescriptions in terms of IWRA's are identified as best practices. Refer to indicator 1.8.4. Legal/regulatory requirements are not considered best practice.

Finding No: TNR-005350

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

in progress

Comment

Best practice for the provision of fair and adequate WASH services: no specific BAT, refer to site water infrastructure (whether drawn for WASH for use by employees and visitors).

It is not clear why the site's water infrastructure to provide water for employees and visitors is considered as best practice. Legal/regulatory requirements are not considered best practice. Refer to indicator 1.8.5.

Finding No: TNR-005351

4	STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *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.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* Obs.

Comment: The water Stewardship plan defines for each KPI a quarterly periodical check made by the process owner. The process owner presents the progress of the project to the Management and the Water team.

The monitoring system is not started yet.

The site presented a minute for the periodic inspection of the water team: 06/04/2023.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* in progress

Comment: The value creation resulting from the implementation of the Water Stewardship plan shall be evaluated at Surveillance.

Finding No: TNR-005370
Finding No: TNR-005371

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* in progress

Comment: The shared value benefits in the catchment resulting from the implementation of the Water Stewardship plan shall be evaluated at Surveillance.

Finding No: TNR-005373

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: In recent years there have been no emergency events.

In accordance with internal system procedures if an event occurs then the root cause analysis will be prepared.

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: The site has engaged in active initial communication with the identified stakeholders to be periodically repeated on its water stewardship performance. This consultation is finalized to confirm shared water challenges and collect commentary from identified stakeholders on the site's performance.

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

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

Comment The Water Team is responsible for reviewing the entire system annually, with the objective of:

-analyzing the results of actions performed in response to the objectives set in the plan and the degree to which they have been achieved, as well as assessing the effectiveness of any corrective actions taken;
-assessing the adequacy of AWS system documentation, staff competencies, and operating procedures;
-checking the validity of EMS and SGSSL certifications as a guarantee of legislative compliance;
-updating stakeholder mapping, shared challenges, risks and opportunities, goals to be achieved in the coming year, and related action plans;
-updating or confirming the Policy;
-establishing how system trends are reported.

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.* — in progress
Comment	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations has not been disclosed. ***Finding No: TNR-004683***
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 Sustainability Report is published every year, in the next early edition the AWS project for Val di Medi will be mentioned. During the interviews with stakeholders, it was confirmed that the site keeps communication related to the implementation of the AWS outcomes. The water stewardship plan is published here: https://www.galvanina.com/wp-content/uploads/2023/05/2.3.1-WaterStewardshipPlan_rev0.pdf
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.* — Yes
Comment	Internally, the plan is published annually on the bulletin board and on the intranet. Externally, the Water Plan is available on the website (the initial one of 7 November is currently available): https://www.galvanina.com/wp-content/uploads/2023/05/2.3.1-WaterStewardshipPlan_rev0.pdf
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.* — Yes

Comment

The site made several efforts to collectively address shared water challenges, including efforts to address the challenges; of engagement with other companies (via Confiundustria), organizations, and community groups (Municipality) in the area, and coordination with public-sector players (University).

Meeting with Apecchio local school (students 6 to 13 years): June 1, 10.00 am. title: “Water and the territory”.

The site organized its own communication and involvement event with the first-grade schools of Apecchio on the third day of the audit. The Lead auditor was therefore able to briefly take part to this event which was attended by elementary school students during which the person in charge of the system held for about two hours a lesson on the water cycle. In addition to the school leaders, the mayor and a strong representation of the Town Hall were also present.

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

Comment

External communication actions are mainly aimed at external stakeholders, with a focus on local challenges and compliance with current regulations.

This also includes disclosure of information about site governance in relation to water, including the positions of those responsible for water legal compliance (see ISO 14001). The tools suitable for this purpose are, by way of example but not limited to uploading information on the web page and/or on social networks, sending/publishing the sustainability report, sending emails, and events such as public conferences or webinars organized by Galvanina or by other public or private organizations (public bodies, universities, trade associations, etc.).

Galvanina, through RAWS, commits to communicating the water management plan to stakeholders and to disseminating the site's annual water management summary, including relevant information on the site's annual water management performance and achievements against targets of the site. It also pledges to disclose efforts to collectively address shared water challenges, including associated efforts to address challenges; engagement with stakeholders; coordination with public sector bodies.

Refer to indicator 5.4.1

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.* Yes

Comment

There are not water-related violations recorded.

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

Comment

There are not water-related violations recorded.

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

There are not water-related violations recorded.

Photographic Evidence from Audit

Yes

Comment No photographic evidence was taken during the audit.