CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001250

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Sanpellegrino S.p.A stabilimento Levissima**
Address: via Nazionale 2- Cepina, 23030, Valdisotto - Sondrio, ITALY
Contact Person: Salvatore Sbriglione
AWS Reference Number: AWS-000669
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Jan-20
Validity of certificate: 2028-Jan-19

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Oct-14
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Freschi, Inspector

Site Participants:
Diletta Scapin, Factory Director
Katia Partesana, SHE Manager
Paolo Bracchi, Source Manager Site
Stefano Fioletti, Sources Coordinator
Michele Praolini, Energy Manager
Giorgio Della Croce, Geologist
Fabia Ruggeri, Corporate Sustainability
Angela Midollini, AWS coordinator

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Oct-15	08:30:00 - 18:30:00	10:00	Carlo Enrico Freschi	
2024-Oct-14	11:00:00 - 18:00:00	07:00	Carlo Enrico Freschi	
2024-Oct-16	08:30:00 - 17:00:00	08:30	Carlo Enrico Freschi	

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 minor non-conformity, and 15 observations were raised.
The client is requested to perform a root cause analysis and define corrective actions for the non-conformity and to submit this to WSAS within 30 days of receipt of the audit report by 19 January 2025.
Minor non-conformities must be closed out by the time of the next Surveillance audit.
The audit team recommends certification of Sanpellegrino Spa - stabilimento di Levissima at the Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans 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 certification audit of Sanpellegrino Levissima Factory against the AWS International Water Stewardship Standard Version 2.
The bottling business started at the beginning of 1900 century, but it was not under Nestle Water control until the end of 1900. The company's activity is the bottling of mineral water-based products.

The facility and the catchment are located in the Adda River water basin. Levissima mineral water is collected in the heart of the Central Alps, in a
protected and unspoiled area on the western edge of the Stelvio National Park, in the Valtellina territory of the county of Bormio. The main supply of the hydrogeological basin covers the eastern edge of the Cima Piazzi mountain group and then flows from high-altitude springs, in a recognized and renowned natural area. In this part of the Valtellina plateau, there are glaciers, alpine lakes, rivers and the Levissima springs.

The audit was conducted onsite on October 14, 15 and 16, 2024
The onsite visit included the assessment of the site's water sources the main production facilities including chemical storage, and the wastewater treatment plant. During the audit, the audit team conducted interviews with stakeholders and held meetings with strategic members of staff in order to understand their involvement in the water stewardship project.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	15
Minor	1

FINDING DETAILS

Finding No:	TNR-013853
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The map of the plant's underground wastewater piping networks which include industrial wastewaters, rainwaters, and clean industrial wastewaters should be updated and checked against the last modification of the plant layout. The connection between the site limit discharge, the connecting sewer to the public WWTP, and its final discharge into the Adda River should also be mapped. The boundaries of the identified catchments will need to be reviewed at the next audit.
Corrective action:	We will update wastewater piping networks, moreover we will map discharge point (with connection between site & public WWTP) and catchment boundaries

Finding No:	TNR-014745
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	the site should provide an abstract of the results of the CPR document related only to the Valdisotto area to ease the link between the SH expectations and the choice of the shared water challenges.
Corrective action:	The site has already implemented a report that split the results between Valdisotto community and Bormio, the other village included in the listening activity where the factory has an impact although the concession doesn't cover it. The evidence is in the report of Doxa attached

Finding No:	TNR-013467
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Other potential risks with their emergency response plans should be defined and investigated in a more detailed form regarding the events such as: failure of the wastewater discharge; potential soil contamination and oily water discharge in the external truck parking lot where there is a potential risk in case of truck oleo-mechanical system failure.
Corrective action:	We will review our emergency plan to cover this finding

Finding No:	TNR-013468
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
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:	An opportunity for improvement is to provide the sampling record form whenever the water is collected by internal or external operators for chemical analysis and to attach it to the analysis report
Corrective action:	we will evaluate how implement sampling record (asking to external lab to perform analyses and sampling record or if our internal lab can implement sampling record and external lab continue to perform only the analyses)

Finding No:	TNR-014744
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
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 should collected and evaluated the data on Adda River water as a receiver of the site's clear water.
Corrective action:	we will collect data on Adda River water quality

Finding No:	TNR-013927
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The wastewater discharge from the CIP system should be automatically controlled with an interlock to prevent any potential pollution due to an operator manual error.
Corrective action:	We will evaluate how we can automate CIP discharge in order to prevent operator manual error

Finding No:	TNR-014746
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	As an improvement to its AWS system the site should improve its knowledge of all catchment surfaces and groundwater, divided into water bodies, and information on the water quality of these water bodies as well as the quantitative status of groundwater bodies has to be covered by the sites catchment analysis
Corrective action:	We will collect some data in order to improve our knowledge on catchment water quality

Finding No:	TNR-015196
Checklist Item No:	1.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The site submitted their water stewardship plan indicating the shared water challenge and the risk related, the site can improve their risk assessment by highlighting the risks, their likelihood, severity of impact, associated costs and differentiating between the different type of risks, physical, regulatory, reputational...
Corrective action:	we will improve our risk assessment by highlighting the risks, their likelihood, severity of impact, associated costs and differentiating between the different type of risks, physical, regulatory, reputational...

Finding No:	TNR-013480
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site has identified best practices carried out by the site only, without consideration of practices by other relevant entities in the catchment, regional, or national levels.
Corrective action:	we will evaluate if there is some best practice indicated by other relevant entities in the catchment

Finding No:	TNR-015065
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site has identified best practices carried out by the site only, without consideration of practices by other relevant entities in the catchment, regional, or national levels to define the best practices to improve its water balance.
Corrective action:	we will evaluate if there is some best practice indicated by other relevant entities in the catchment

Finding No:	TNR-015066
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site has identified best practices carried out by the site only, without consideration of practices by other relevant entities in the catchment, regional, or national levels to define the best practices to improve its water quality.
Corrective action:	we will evaluate if there is some best practice indicated by other relevant entities in the catchment

Finding No:	TNR-015067
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site has identified best practices carried out by the site only, without consideration of practices by other relevant entities in the catchment, regional, or national levels to define the best practices to improve its IWRA management.
Corrective action:	we will evaluate if there is some best practice indicated by other relevant entities in the catchment

Finding No:	TNR-015186
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site has identified best practices carried out by the site only, without consideration of practices by other relevant entities in the catchment, regional, or national levels.
Corrective action:	we will evaluate if there is some best practice indicated by other relevant entities in the catchment

Finding No:	TNR-015011
Checklist Item No:	3.2.1
Status:	Open
Finding level:	Observation
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The checklist used for the internal audits to verify full legal and regulatory compliance could be improved by adding the AWS requirements.
Corrective action:	during annual internal compliance audit we will ask to cover also some AWS requirements (sample check)

Finding No:	TNR-015068
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-29
Checklist item:	A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	A comprehensive site’s water stewardship performance report, including quantified results against targets, is not yet disclosed to the stakeholders.
Corrective action:	We are updating the same file used for other Sanpellegrino Factory in order to disclose results to the stakeholders

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Finding No:	TNR-014748
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	the site should provide a plan for disclosure on all relevant targets and quantified performance against targets
Corrective action:	we will use the same disclosure plan already used in other SanPellegrino factories

Report Details

Report	Value
Report prepared by	Carlo Enrico Freschi
Report approved by	Nathalie Karam
Report approved on (Date)	19/12/2024

Surveillance

Proposed date for next audit
2025-Sep-29

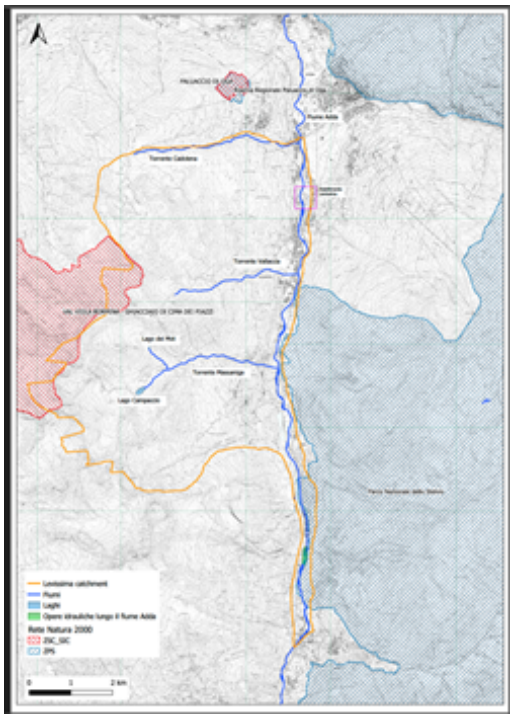
Stakeholder Announcements

Date of publication	Location
24/07/2024	Municipality of Valdisotto official website: https://comune.valdisotto.so.it/it/news/140597/levissima-alliance-for-water-stewardship-audit
20/07/2024	AWS website: https://a4ws.org/wp-content/uploads/2024/08/AWS-000669-San-Pellegrino-Spa-Cepina-Levissima-SA-Oct-24-V3.0.pdf

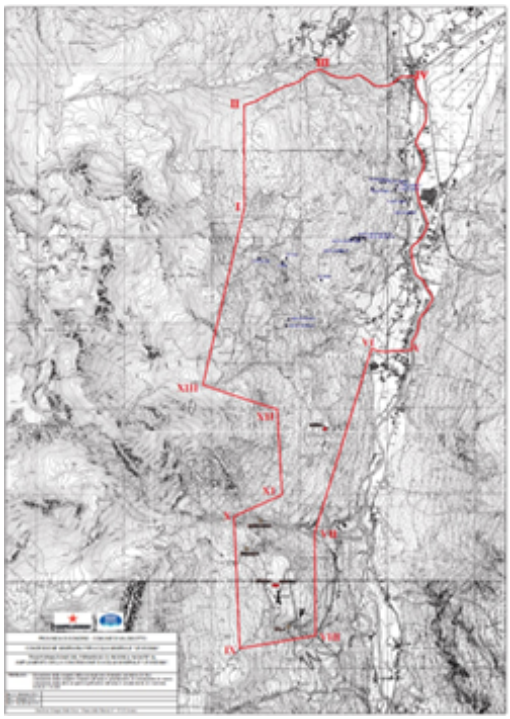
Comment: The Stakeholder AWS announcement was prepared for the certification audit.
The announcement was published on the AWS website, on the company website, on the website of the Municipality of Valdisotto
The publication has been verified during the audit.
The Lead Auditor did not receive any request for information or complaint before the audit.

Catchment Information

0 geografical location.png

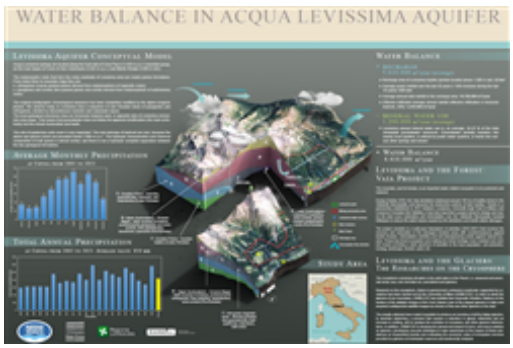


5 Catchment e IWRA Levissima.png



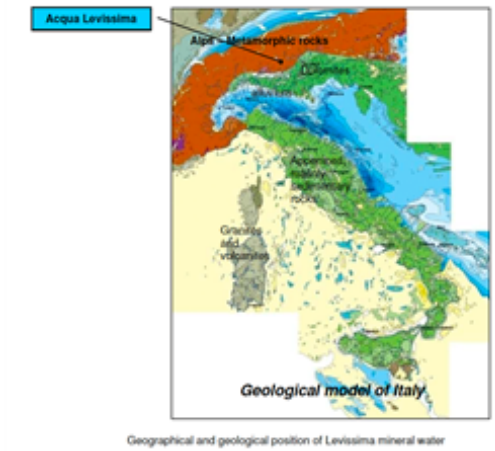
4 concession area.png

3 concession area visual.png



6 Nestle_Water_Levissima_Poster_English.jpg

2 catchement.png



Geographical and geological position of Levissima mineral water

1 geology.png

Catchment Information

The main catchment is a large area hydraulically defined as VALTELLINA – Adda River Valley -(approx 120km long and 60km wide.) extending from the glaciers to the Como Lake. A small part of it, where there is direct hydraulic influence with the site, can be called VALDISOTTO sub-catchment covering upstream the concession area, a short part of the Adda River valley, and downstream the Adda River valley down the junction with the Cadolena River having a higher average water flow, coming from the later valley of the same name

The Catchment area has been delimited according to geological, hydrogeological, geomorphological, and hydrographic criteria and has a greater extension than the Concession area, including the recharge area.
The north side of the Catchment has been delimited by exploiting the hydrographic and geological/hydrogeological criterion of the area.
The west side of the Catchment coincides with the mountain ridge of the Cima Piazzi – Corno di San Colombano complex: the delimitation follows the natural watershed (coinciding with the hydrogeological limit) that connects the Corno di San Colombano, Monte Rinalpi, Cima Riacci, Pizzo Coppetto, Sasso Terraccio.
The sector located to the southeast delimits the glacial cirque of Campaccio up to the valley floor of the Adda River. The stretch of the western valley floor of the Catchment develops along the Adda River up to the locality of Le Prese, at the confluence with the Rezzalasco Creek.

Comment

Client Description and Site Details

Client/Site Background

The site covers the main area:
The Levissima sources inside the concession area: they are located on the East side of Cima Piazzi (3.439 m a.s.l.) mountain group, on the east slopes of Corno Di San Colombano (3.022 m a.s.l.) and Monte Rinalpi (3.009 m). On the North side of Cima Piazzi there is the glacier of the same name, not directly connected with Levissima mineral water. Adda River (east), Cadolena Valley (north), and the alignment Monte Tiola (south) are also the boundaries of the mineral water concession area. Extension of the concession area: 984.08 ha (released on 2.03.2018, before the extension was 635 ha). Expiry date 21.03.2035.
extension of the production plant is 101.305m2
The Production Plan: the Levissima site in Cepina - Valdisotto (So) where the mineral water is bottled.

The mineral water comes from the springs located on the right bank of the Adda, at an altitude between 1440 and 1900 m. above sea level, it is conveyed with stainless steel pipes into 4 stainless steel tanks, with a capacity of about 800 m° each, installed inside the plant. From the tanks, with special pumps, the water is sent to the "bells" of the fillers of the individual bottle filling lines, through stainless steel pipes.
The following production activities are carried out in the plant:
1. Production of preform bottles and PET plastic bottles
The PET resin arrives at the plant by truck and is discharged pneumatically into special stainless steel silos.
From the silos, the resin is sent pneumatically to the departments in special tanks that feed the dryers of each forming press.
The dried resin is extruded to create the preforms, which are stored in special boxes called "Octabin" (intended to feed the in-line blow molding machines) or sent, for some lines, directly to the blow molding machines that produce the bottles.
2. Bottling and packaging of mineral water and flavored water in plastic bottles (PET). The PET bottles, produced by blow molding machines installed at the beginning of the line, are sent to the filling area. Here they are filled, corked, and labeled, and then forwarded to the packaging department. In this department, the bundles of bottles are prepared and then packaged in pallets which are then wrapped and transported to the warehouse with forklifts and from there loaded onto trucks for shipping to customers.

Water-related infrastructure:
Levissima mineral water is the product of the mixing of 8 groups of springs (the total number of single springs actually in the mineral water mix is 19 single springs and a group of 4 wells (three vertical wells and one horizontal well). Sources (wells and springs) are located at an elevation ranging from 1151 m a.s.l. To 1849 m a.s.l. .

Springs: mineral water is intercepted by means of galleries cutting the first soil layer constituted by dendritic and weathered silt and clay and penetrating for several meters into the subsoil. Some galleries reach the bedrock, some remain in quaternary cover. Where possible due to the geomorphological conditions, the soil above the catchment has been waterproofed to avoid local infiltrations.
Wells: wells intercept the water at the basis of the deep local quaternary cover and the top of fractured bedrock. They are completed with stainless steel casing and sealed in the upper portion (to the ground level) with a cement-bentonite mixture.

In the area of the "Levissima" plant in the municipality of Valdisotto (So) there are 4 groundwater diversion works, subject to concession. All the wells capture the underground sub-river flow of the Adda River for industrial and internal potable use.

The discharges of industrial wastewater at the "Levissima" plant have a double point of final delivery:
the industrial portion is collected and sent to the public sewer (S5 is discharged into the public sewer after ph neutralization treatment in the tanks of the "homogenizer"; s7, s8, and s9 are directly connected to the public sewer).);
the remaining portion(mainly rain or spring overflows) passes through a pH neutralization treatment in the tanks of the "neutralizer", and is then released into the Adda River.

9 site winter overview.png

7 Where we are.png

8 downstram catchment overview .jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges
Being part of a Group, the site considered as a starting frame the input received from the Nestlè Water department applicable on all sites:

"Before 2025. regenerate in the catchment of reference as much water as we withdraw through projects that impact the quantity, quality, and accessibility of the resource, collaborating with local stakeholders to address local needs".

Starting from this general assumption to be applied in the catchment and its local stakeholder point of view, and expectations, the Levissima site has identified the following main local water challenges applicable within the catchment:

Governance:
Climate Change: Extreme weather events - Storm Vaia (2018); project shared with the Municipality of Valdisotto and Consorzio Forestale Alta Valtellina: mitigate the damage caused by storm Vaia in the area
Abandonment of the mountains by residents and the impact of unsustainable tourist development; project shared with the Municipality of Valdisotto : enhancing the territory and sustainable tourism
Lack of water availability for the municipality's drinking water supply. project shared with the Municipality of Valdisotto and SECAM, the public company in charge of the water-integrated service Modernization and safety of the public spring against possible landslides, improvement of the collection chamber, and replacement of the pipes to the aqueduct.

WASH:

Drinking water supply to the Municipality of Valdisotto; project shared with the Municipality of Valdisotto and SECAM, the public company in charge of the water integrated service.
Transfer of the source to the Municipality and, subsequently, to SECAM for management.
Support to the Municipality in obtaining authorizations.

IWRA:
following the 2018 VAIA storm: Degradation of the forest cover of the mountain slope potentially exponential due to the spread of the bark beetle; project shared with the Municipality of Valdisotto and Consorzio Forestale Alta Valtellina: mitigate the damage caused by storm Vaia in the area
Lack of awareness of the effects of climate change on glaciers; Partnership with Stelvio National Park - education & scholarships (Trudi project)

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**
0.1.1	*Eligibility Criteria*
0.1.2	
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.* — Yes
Comment	The auditor visited the main bottling site including the outside yards the wastewater treatment plant the different discharging points to the Adda River, one spring chosen by the sample, and the relevant connection piping system to the plant.
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.* — Obs.
Comment	The Valdisotto sub-catchment where the site is located Levissima mainly covers the concessions area on one side of Adda River and its first and second-order tributaries (side-stream tributaries). The higher limit of the sub-catchment is not clearly identified. The right part of the sub-catchment can be considered equal to the Levissima Basin mineral water concession from the top of its hydrogeologic down to the Adda River. All the Levissima mineral springs are located in this area in the concession area. In the middle of the valley, the Adda River flows over a suspended e impermeable formation The upstream of the river is considered part of the catchment up to the geographic limit of the concession. Downstream the Adda River flows for a few kilometers before mixing with another river coming from the lateral Cadolena valley with its river, having a water flow on average more consistent with the one flowing inside the Adda River.
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.* — Yes
Comment	The site is managed under a single-based management system by Sanpellegrino SPA
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's primary production process is bottling mineralized water. Other lines process different kinds of Water, Flavoured Water, Italian Sparkling soft Drinks.

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.

Obs.

Comment

A point of strength of the site is the knowledge and management of the concession area from the hydrogeological approach is strictly related to the company's core business.
The site provided the following documents:

1. Water Resources Study update 31122023: is the Levissima natural mineral water hydrogeological report
2. Diagram of the water distribution system for hygienic use: plan of the drinking water distribution network for hygienic use within the site;
3. General plan of plant discharges: plans of the underground networks of the plant which are divided between industrial water that is delivered to after a site pre-treatment to the municipality WWTP with final discharge to the Adda Rive and a network for rainwater and clean industrial water that can be discharged directly into the Adda River;
4. General plan of the industrial network: plan of the water networks for industrial use coming from the wells;
5. PLA Drains 2024 - Drain 18.07.2024.pdf plan: Wastewater outlet points plan as per authorization;
6. Levissima_catchment and pipelines: plan of the underground networks that connect the collection points (springs and wells related to the water sources from where the bottled water originates.) with the plant;
7. Municipal Sources: plan of the municipal springs for public use that are present within the catchment;
8. Mining concession: plan of the mining concession that delimits the areas in which the collection of sources for producing mineral water is permitted; A map containing the buffer areas must be respected to safeguard the springs. As per Italian law, the areas are listed in : The absolute protection zone consists of the area immediately surrounding the catchments or derivations: It must have an extension of at least a 10 m radius from the point of the source. The buffer zone consists of the portion of land surrounding the absolute protection zone that is subject to constraints and uses such as to protect the water resource captured qualitatively and quantitatively. As a general rule, the buffer area is 200m radius.
9. Simplified mineral circuit plant: plan of the main water networks of the site;
10. Catchment and IWRA Levissima: plan of catchment and identified IWRAs

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.*	Obs.

Comment

The site has identified a group of stakeholders according to a Group process called CRP: Community Relation Process.
The stakeholders are divided into five categories:
LOCAL REPRESENTATIVES (7)
LOCAL BUSINESSES (10)
LOCAL INFLUENCERS (13)
LOCAL COMMUNITY (3)
The identified SH covers all parties interested in improving the catchment water stewardship.
A table summarizes for each SH: category, name, expectation, the influence of SH on site, the influence of site on SH, position vs AWS project, the influence of SH on catchment,
Within the activities of CRP, a specific Nestlè Group SH consultation, the site performed a Diagnosis Survey scheduled every three years and managed by an external independent consultant in communities affected by the factories Acqua Panna, Levissima, S.Pellegrino, and Nestlé Vera. The Research conducted for NESTLÈ WATERS was done in Q1 Q2 2024.
The new CRP 2024 full report was prepared by the consultant in Q3 2024.
The document was developed to provide Sanpellegrino with technical and scientific support for planning water replenishment actions related to the production activities carried out at its industrial plant in Valdisotto.
The CRP is based on the following assumptions:
Qualified stakeholders: 10 one-to-one interviews made by the Plan Director to top representatives to present and share the water common challenges and define the strategies for their development.
General public: The basic rules for the statistics are:
Telephone interviews (CATI system, Computer-Assisted Telephone Interviewing)
Structured 10 minutes questionnaire
• 50% men / 50% women
• aged 18 y.o. +
• residents in the areas around the NW production sites
• Aware of the NW plant near their home
For a total of 150 interviews in Bormio / Valdisotto
The results are presented with evaluations of data and focus on the Legal Accessibility index.
The document was developed to provide Sanpellegrino with technical and scientific support for planning water replenishment actions related to the production activities carried out at its industrial plant of Levissima.
In Valdisotto / Bormio, satisfaction with the presence of the Sanpellegrino Levissima plant is overall high as well. In particular, the citizens surveyed expressed high judgments about their pride in living in this area, but also about Nestlé's good management of the water resource.
Compared to the past, positive ratings about the management of the environmental impact, the contribution to local development and the factory's presence in the area rise.
The points for improvements are related to increased care/development of forest areas and pest control (bostrico abete rosso = A pest that attacks plants).

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.*	Yes

Comment — Stakeholders are related to the site's catchment. The site has identified and evaluated the expected stakeholders' ability to influence or be influenced. The stakeholders are classified according to their level of Influence/Interest (4 levels from low to critical) and their opinions towards Sanpellegrino Stabilimento Levissima.

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

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

Comment — The incident response is addressed in some site documents: all scenarios are also managed for the ISO 14001 system and described in 1.3.1 0871.IN.PR.002.04 Procedura gestione rischio chimico e prodotti chimici..
The water-related incident responses are:
- accidental spills of chemicals. A specific operating instruction 1.3.1 0871.SE.IO.024.04_Spandimenti accidentali di prodotti chimici has been prepared and applied to all liquid products in the establishment included in the chemical and oil/grease categories. The Risks associated with the spillage of liquid substances (hazardous and non-hazardous) are represented by the possibility of contamination of the environment (soil and waterways through company discharges). Protection against chemical spillage (action regulated with 1.3.1 0871.SE.SOP.131.00 Procedura contenimento durante sversamento sostanze pericolose.) and flow into the sewer are the containers placed under each chemical storage and the interception kit located in several parts of the site kept under regular control. (as decribed in 1.3.1 0871.SE.D.011 Ubicazione Kit Antispandimento e aree stoccaggio prodotti pericolosi).

Other scenarios are taken into consideration:
- Wells and sources area intrusion: All wells and springs are inside protected areas (segregated and with remote control).
- Source area protection: as said above this is regulated by law with defined protection areas around the sources. Anti-intrusion equipments are also installed in the sources.
- Interconnecting pipes degradation: all underground pipes from the well and sources to the site storage tanks are in SS.
- Snow avalanches which might affect the soil stability and thus the quality of the mineralized water,

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

Comment — The Site identified and mapped all major inputs, outputs, and storage of water related to the production site.
The focus is on the mineral sources (with a variable flow of which only a part is used for production and considered while the overflow is directly discharged back to the natural environment via a collecting system).
The main inputs are mineral water springs and wells, industrial wells, rainwater falling on the site;
The main outputs are: bottled mineral waters, industrial treated wastewater to municipal plan, clean industrial and rainwater to river Adda, evapotranspiration, losses on the underground collecting system (not on mineral water piping and storage).

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	Data showing detailed water inflows, outflows, and losses are available on 1.3.3 Factory Water Mapping YTD 2023. Data are collected from instruments that are periodically calibrated under a maintenance program to have trustworthy figures. The rainwater is estimated from the data from the pubic meteorological station 1.3.3 Bilancio acque piovane. Annual variances are not relevant. The data analysis (excel) contains detailed data on mass balance, The site utilizes a Water Withdrawal (WW) index to evaluate efficiency, measuring m3 of water used (including overflows and overfilling) to produce a m3 of product. The indicator is considered a site general efficiency index, but there is no evidence that it would be a threat to good water balance for catchment people or the environment. The evolution of this indicator of performance is checked periodically and they can compare these data between years and let to check the evolution. - 2023: 1,3 l/l the kpi is in line with water bottling plants using only plastic bottles. The Group recently introduced a new global index. The new SHEPM Group kpi is to reduce global water consumption by 20% within 4 years (2024-2028) related to the CSW sustainability project (internal/external water balance within the catchment). The Group's general commitment is to return/make available the quantity of water to the community at least equal to what is withdrawn. A local project of water consumption reduction is related to the optimization of the use of water for the steam production process (purges and leaks)for an expected quantity of 4000m3/year.	
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 analyzes the mineralized water coming from the wells and sources: these analyses show that the mineralization over the years is preserved.
The Site considers this an essential point of strength for the evaluation of the business and industrial company.
The mineralized water quality is under continuous monitoring by the analysis performed by The University of Pavia. (LEVISSIMA_LEVISSIMA_BATT_UFF_2023 (2).pdf; LEVISSIMA_LEVISSIMA_CHIM_UFF_2023 (1).pdf)
A periodical control is also performed by the Nestlè Group Quality Control main accredited laboratory.

The Site performs analysis of its industrial wastewater before the discharge. The Site complies with the limits and regulations according to the permit (AUA Autorizzazione Unica Ambientale) to discharge into the river and into the sewer going to the local municipal wastewater treatment plant.
The public environmental authorities can perform inspections without notice at any time. These controls have never identified any problem.
On the main industrial wastewater outlet S5 the authority SECAM performs a sample and analysis twice a year collecting a three-hour medium sample. The site performs voluntary periodical routine analysis on the industrial wastewater outlet with an external laboratory every month. . (attached 1.3.4 240802-002 S1 Sanpellegrino_Stabilimento di Valdisotto (acqua di scarico).pdf; 1.3.4 240911-001 S2 Sanpellegrino_Stabilimento di Valdisotto (acqua di scarico).pdf 1.3.4 240911-002 S4 Sanpellegrino_Stabilimento di Valdisotto (acqua di scarico).pdf; 1.3.4 240913-001 S5 Sanpellegrino_Stabilimento di Valdisotto (acqua di scarico).pdf

The outlet water is monitored by making chemical and biological analyses; the samples are taken by the site maintenance but there is no evidence of the sampling procedure which may affect the results.

All evidence of testing results is available as a record, and data is analyzed with their trends.

The stormwater after collection is considered at the discharge point of good quality as it comes from roofs and paved external areas. This water is not metered (volumes after evaporation are estimated as 90% of the rainwater).
The outlet water permit does not require quality control on the site discharge of rainwater but a proactive action could be its quality monitor.

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

Obs.

Comment

The site has identified and mapped all chemical products.
A map is provided with the chemical deposits' location and the spill kit equipment's location (see attached plan).
A list is provided for all the chemical products approved for use in the factory, with all necessary indications for H&S and environmental correct handling.
According to the group policy, dangerous chemical products should be avoided and plans to reduce their use are in place.
All chemicals are stocked only in a dedicated area in a segregated area and moved into the production area only for daily consumption.
The CIP system for the filling lines produces some wastewater which is connected to two different underground sewer pipelines, one for industrial water where all the drains containing chemicals must be discharged to be collected to the wastewater treatment plant and one for clean rinse water discharged without treatment.
The choice of the plant outlet is manually controlled. A mistake could cause potential pollution.

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

Sanpellegrino Levissima has identified and mapped the most important on-site IWRA including the mineral springs, which are part of the site:

Environmental importance: the sources are fundamental for the activity of the plant. Industrial production is the bottling of mineral water that comes from the springs. The management of the sources and the areas where they are located is the subject of the agreement that allows their capture and exploitation. Maintaining the areas within the concession in an environmentally protected state is the basis of the company's entire business.

Community importance: the satisfaction of workers' needs in terms of drinking water and services is optimal and guaranteed by law.

Cultural importance: the water sources identified above in the past were of free use even if not exploited and the water was released free-flowing into the rivers. Even today in the area rich in water there are other unexploited springs that feed the network of local rivers.

Economic importance: the free flow of water from the springs on the coast of the valley has allowed the establishment of a forest that is now a protected area of significant naturalistic value for the catchment.

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

Yes

Comment

The Site keeps under control a list of annual water-related costs, water-related revenues, and shared-value creation.
The site keeps under control a description/quantification of social, environmental, or economic value generated related to the water management, by the site to the catchment(as described in the attached document).
For the main projects, all details are given in a table with information such as description, Water-related costs, revenues and shared value creation, Responsible Amount Comments

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

Yes

Comment

The condition of the WASH facilities at the site is naturally controlled. There are enough facilities such as toilets, changing rooms with shower facilities, availability of bottled drinkable water, and cafeteria for all categories of workers during the different shifts, taking account of gender and mobility, including contracted workers.
Panel explaining the basic rules for hygiene education on site (also related to HACCP rules of the food management system), both in text and pictograms are widely available.
The water distributed with internal piping to the sinks comes from industrial wells in the Adda River an underground flow and it is only filtered. The water is of a very good purity level, similar to the one used for bottled water, it is periodically monitored by the internal lab with the same analytical method as the bottled water on samples taken at the exit of the filtration plant.
An external lab performs the Legionella analyses. According to Italian law, a legal requirement states that only an accredited lab can provide analysis to prove the water's potability. The site performs regular control analysis.
A project is under evaluation to connect the internal water distribution network to the local municipality aqueduct.

1.4 *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*

Yes

Comment
The site carried out a study to identify all major suppliers. (the main categories of material are Self-adhesive tape, labels, capsules, self-adhesive labels, plastic capsules, plastic films, screw caps, glues, paper labels, plastic preforms, plastic caps, crown caps, interlayers, cartons, wooden pallets,)
They all come from their production area outside the catchment, so they do not have a direct influence on the catchment water balance.
Nevertheless, having identified the packaging material as the one whose production requires a greater consumption of water, the Group has started to identify possible improvements in the water cycle at the supplier premises (first approach to advanced indicator 1.4.3)
Nestlè Group for its Water companies Is also working on a general LCA study (including C2 emission) where a water section is present.

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

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.
These institutions ensure responsible governance, policies, and frameworks for the sharing of water resources in the interests of all users (stakeholders and Indigenous people) and the natural environment in line with the principles of water stewardship and the company's goals.
The site has implemented a system to understand and share with the stakeholders the above matters.
All the projects cover initiatives that are shared with the stakeholders such as.:
Progetto MASSANIGA
Progetto PRESURINE
Progetto PRESURINE 2.0 2024
Progetto SANTA MARI 2023 A
Progetto TIOLA
Progetto VAIA 2023

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 yearly assesses its compliance with legal and regulatory requirements according to the requirements of its ISO 14001 management system.

Every three years another audit from the group according to the NER Nestlè Environmental Requirement is performed.
Spring water: Special focus is always given to the mineralized water concessions from where the raw water for production is taken. The concessions contain limits in terms of quantity.
Industrial wells: the concessions contain limits in terms of quantity.
Wastewater: the WWTP discharge is regulated by the AUA permit to discharge into the municipal sewer connected to the public wastewater plant and into the
Adda River: a comprehensive technical attachment to the permit gives all the requirements to be respected in terms of quality and quantity.
A complete set of all the legal permits for abstraction and discharge was presented during the audit.

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 catchment water balance with precipitation, punctual source flows, subsurface flow runoff, hydrogeological characteristics and data were provided for different areas:
- A 3D model for the catchment
- The Adda River
- The mineralized water springs
- The water extracted from wells

The total quantity of water flowing through the catchment is almost constant and there are no relevant seasonal fluctuations as the flow is regulated by an upstream dam serving a hydroelectric power station. In winter time the snow is present in the catchment in a relevant quantity (Bormio and all the surrounding mountains are well-known ski resorts).

The scarcity of water is not a problem in the area.

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.*	Obs.

Comment

Throughout the catchment, the quality of the water is at a high level. The underground water that flows from the sources is used for bottling due to its characteristics, while other sources are dedicated to refilling the aqueducts for the indigenous populations. In the catchment flows the Adda River whose waters are extremely clean as there are no production sites upstream could create a significant level of pollution. All civil and industrial wastewater within the catchment is conveyed and purified.
The quality of all waters in the catchment is kept under control by the local authority.

The site analyzes chemical parameters on all industrial wells and on the mineralized water springs under a periodical schedule. It also includes the physical and biological status of the catchment according to its commitment to the environment and the territory.
All mineralized waters are kept under strict control for production quality control.
The wastewater outlets and the rainwater/clean process water are also periodically controlled according to the discharge permit regulations and more frequently analyzed by the internal laboratory.
Industrial wastewater usually turns out to contain essentially not dangerous products used during the CIP process which is then neutralized before the discharge.

All data are carefully recorded and monitored.
Other water quality data for the catchment are obtained from various sources such as regulators, environmental agencies, and academic studies.

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

IWRAs (Important Water-Related Areas) represent an important selection of points/areas that, if compromised or lost, could negatively impact the ecosystem of the analyzed basin (Catchment). They therefore represent significant points within the basin itself. In the specific case of Levissima Catchment.
The Site has identified and mapped the following IWRA and the status of different protection areas in the catchment:

1. TORRENTI CADOLENA, VALLACCIA E MASSANIGA
These are perennial streams located on the slope under study. The streams are classified pursuant to Legislative Decree 42/2004, as expressed by the P.G.T. Valdisotto.
Cadolena
MAIN Creek: At the outlet into the Adda, the riverbed of both watercourses risks suffering an excessive reduction in officiousness due to solid transport coming from upstream. The instability manifests itself with considerable phenomena of longitudinal and transverse instability. They are at risk of flooding the inhabited centers of Oga and Santa Lucia. The trim lines provide for the reduction of the solid contribution from the slopes and of the transport solid along the rod, the improvement of the capacity of outflow in flood at the Adda confluence, Adaptation of the level of protection for built-up areas and road infrastructure.
SLOPES: Landslides can be recognized along both sides of waterways: along the Oga on the right bank in correspondence of the confluence with the Adda and in correspondence with the village of Oga, along the Cadolena upstream of the Canton locality.
Vallaccia
MAIN creek: The Vallaccia stream is characterized by a high potential for solid transport downstream with the risk of obstruction of the ducted section in the town of Cepina due to the inadequate section. The trim lines provide for the reduction of solid transport and the protection of the town of Cepina.
SLOPES: Near Cepina, in the winter season, there are numerous avalanches. The trim lines provide for the protection of the town of Cepina.
Massaniga:
MAIN creek: Torrential activity causes phenomena of undermining at the foot of the banks, with the triggering of slope instability and risk of obstruction
of the Adda riverbed at the confluence. The lines of are aimed at reducing transport and the erosive capacity of the watercourse,
as well as the adaptation of the defensive systems in fan to protect the town of Fontane.
SLOPES
The lines of the structure provide for the consolidation of surface erosion through widespread interventions of Naturalistic engineering and turf maintenance
forest.

2. FIUME ADDA
is the main watercourse of Valtellina. This river, in addition to being classified pursuant to Legislative Decree 42/2004 as expressed by the Valdisotto P.G.T., is the subject of numerous studies, including collection of flow dates, monitoring points, etc ...; the hydrograph and the quality of the Adda River are intrinsically connected with the operation of the infrastructural works for the production of hydroelectric energy (operator: A2A), all located in the upper portion of the catchment area of the river itself, upstream of the Levissima plant.

3. LAGHETTO DI CAMPACCIO E LAGHETTO MOT
These are two lakes located in the central-southern sector of catchment of which there is a buffer zone of 150 m pursuant to Legislative Decree 42/2004, as expressed by the Valdisotto PT. To date, no specific monitoring is available.

4. SIC - Val Viola Bormina - Ghiacciaio di Cima dei Piazzi -
Natura 2000 Network Areas (SAC, SPA, SCI) areas. Natura 2000 is the main instrument of the European Union's policy for the conservation of biodiversity. It is an ecological network spread throughout the territory of the Union, established under Directive 92/43/EEC "Habitats" to ensure the long-term maintenance of natural habitats and species of flora and fauna threatened or rare at the Community level. The network consists of Sites of Community Interest (SCI), identified by the Member States by the provisions of the Habitats Directive, which are subsequently designated as Special Areas of Conservation (SACs), and also

include the Special Protection Areas (SPAs) established under Directive 2009/147/EC "Birds" concerning the conservation of wild birds. The following areas fall under this classification:
- Val Viola Bormina – Cima Piazzi Glacier.
- Stelvio National Park.
- Paluaccio di Oga
All three areas are marginal to catchment, (e.g. Stelvio Park, Val Viola Bormina – Cima Piazzi Glacier) or completely external (e.g. Paluaccio Oga). Please refer to the relevant folder for further information on the status of the SCI of greatest ecosystem interest due to its proximity to the catchment (SCI Val Viola Bormina and Piazzi Glacier): to date there are no specific projects funded by Sanpellegrino S.p.A. on the area, however as part of a multi-year research agreement with the University of Milan, scientific research in the glaciological field in the sector of the Rhaetian Alps in Alta Valtellina is financed. the results of which are transversal to the various glacial bodies existing in the area.

5. FONTI LEVISSIMA E FONTI AD USO PUBBLICO -
Progetto VAIA During the evening of October 29th, 2018 severe showers and thunderstorms developed across northern Italy.
One particular cluster of storms spawned one whirlwind near Valdisotto area, where Levissima factory and its water sources are located.
Most of the damages are related to uprooted trees, and associated structural damage (e.g. road access to the catchments interrupted by fallen trees, and damages to enclosures).
This class includes Levissima catchments, catchments shared between Levissima and the Valdisotto Municipality (Presurine springs), and municipal springs; this IWRA, in addition to catchment, also belongs almost entirely to the site subject to certification. Levissima catchments have an important economic-environmental resource for the area, while municipal catchments have great value from a territorial point of view, as they feed the local aqueduct network.
The IWRA was impacted by Storm Vaia (October 2018), and an important land cover restoration project has been underway since 2022 in partnership with the University of Milan, the Alta Valtellina Forestry Consortium, and the Municipality of Valdisotto, 100% financed by Sanpellegrino S.p.A. with a multi-year investment and maintenance plan.

6 Attività UNIMI_ 2020-2022 (see 1.8.4)
7 Analisi Ghiacciaio dei Forni

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

Comment The site has submitted a map with the existing water-related infrastructure, including the underground water pipelines
and the location of the springs and wells under concession. During the past years, the infrastructure of the wells has been maintained and rehabilitated.
Surveillance is maintained to prevent or reduce the consequences of potential extreme events.

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

Comment The adequacy of available WASH services within the catchment has been identified as good. The population of Cepina has access to sanitation, drinking water, and hygiene (including schools).
The site supports as a main sponsor different local social activities. The site provided bottled water supplies to schools, local charities and environmental organizations to maintain high standards of hygiene and ensure access to safe, drinkable water.

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 provided a list of their shared water challenges, that it has identified in consultation with their stakeholders. The challenges are also prioritized according to the application of defined criteria.
The main water challenges are:

(IWRA): Climate change

(IWRA): Climate Change & Biodiversity

(Governance) Abandonment of the mountains by residents and the impact of unsustainable tourist development. Need for greater direct integration in governance with the bodies and technical bodies for the management of the drinking water cycle and the prevention of hydrogeological instability.

(WASH) : Shared managing of the underground aquifer from where both the site for its mineralized water and the Municipality for its Drinking water supply, have springs.
(WASH): Need to optimize water consumption as a finite resource.

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

Yes

Comment

The identified initiatives related to each water challenge are listed in a table of the Water Stewardship plan.
The initiatives cover the expectations of the site and the stakeholders,
For each initiative the following points are defined: :
Main Project; Sub Project; Action to achieve and maintain; Main related AWS outcome; Position of the person responsible for action and achieving task; Planned timeframe to achieve Project/ Sub Project; Planned timeframe to achieve Action; On time?; Status of the subproject/actions: Active- Deleted-Completed- To be launched;
Date of last meeting in which we check the % of advancement to the project target;
Surveillance; % of advancement; : % of reaching of the Main project target; "Impact of delay of the action on the project and AWS Outcomes; Financial budget allocated for action; Capex ; Amount of budget required (K Euro); Target of main Project; "Sub Project KPI;; post Project evaluation: Main Project Results and lesson learn or new relevant info; Value creation: Other project co-benefits; Best practice; Evidence of stakeholder engagement

Here is an example of the site water initiatives:

Water quality:
reduction of the consumption of chemical products for the bottle washing process and optimization of the washing cycles of the lines;

Water quantity:
Water consumption for the production of ozonated water for rinsing PET bottles with the elimination of rinsers and the related process;
Water consumption for power evaporative towers: Installation of a heat pump for building heating, which allows the recovery of process waste heat that would otherwise have to be disposed of through the use of evaporative towers;
Improvement of the process that involves the use of disposable mineral water flushing (waste) for CIP: non-optimized evaporative tower concentration cycles with consequent waste of industrial water;
Non-optimization of the use of water related to the steam production process (purges and leaks);

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

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

Comment

The site has identified a list of water risks related to shared water challenges and the main production process.
For each risk the following points are defined: Type of risk (risk to the site OR from the site, Nature of risk for the site, severity of impact, Likelihood of occurrence, Current status; Future trends, and Priority.

The main external risks related to shared water challenges are:
Degradation of forest cover on the mountain slope is potentially exponential due to the spread of the bark beetle;
Lack of awareness of the effects of climate change on glaciers;
Lack of awareness of the effects of climate change on the ecosystem and biodiversity;
Limited economic and social development of the territory;
Lack of water availability for the municipality's drinking water supply;
Lack of water availability for the municipality's drinking water supply;
Progressive inaccessibility of the structure due to hydrogeological instability;

The main internal risks related to the site production are:
Water consumption for ozonated water production for bottle rinsing;
Water consumption for cooling towers;
At each CIP disposable mineral water flushing (waste);
Evaporative tower concentration cycles not optimized with consequent waste of industrial water;
Non-optimization of the use of water related to the steam production process (purges and leaks);
Water waste linked to the obsolescence of the technology used and the non-optimization of the line CU;
Non-optimization of the use of water related to the steam production process (purging) and greater use of chemicals for the conditioning of feed water greater use of water linked to the technology currently used.

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

Comment

The site has identified a list of water opportunities related to shared water challenges.
For each opportunity the following points are defined: Type of opportunity (opportunity to the site OR from the site, Nature of opportunity for the site, Scope, Type of impact, Description of potential impact, time frame, Ease of implementation, and Priority.

The main opportunities are:
Understanding the impact of climate change on glaciers and water supplies;
Promoting the territory and respect for nature;
Measuring the effects of climate change and extreme events (Vaia) on biodiversity;
enhancing the territory and sustainable tourism ;
make available the technical knowledge and financial resources of the company to contribute to the drinking water supply of the municipality;
Sustainable use of water resources.

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.* Obs.

Comment

The availability of water in the catchment is very high and above the average in Italy, however, the local authority is overseeing the savings of water and demand side management to optimize availability.

Best practices done by the site:
The site has identified several actions to define and implement applicable good practices relevant to the AWS system.
The site obtained the certification for its Environmental Management system according to ISO 14001:2015 which is considered a best practice.
The site keeps a good relationship with all the stakeholders who are interested in good water and groundwater management in local/catchment, regional, and national contexts.
A project is:
(Governance) Progetto IUSS CLIMATE: in cooperation with Scuola Universitaria Superiore - Pavia . Increased temperatures, altered precipitation patterns, and more frequent extreme weather events can affect mountain environments, leading to profound ecological and socio-economic consequences.

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.* Obs.

Comment

The site has identified several actions with a specific focus on the management of water quantity.
The site studied the implementation of actions that can be classified as best practices shared with the involved stakeholder.
The projects can be classified as best practice as they are shared with a qualified stakeholder of a top scientific level.

For example:

Progetto MASSANIGA: During the activities related to the Monte research permit, the artifact for the collection of the water captured from the Massaniga spring was made safe at the expense of Sanpellegrino S.p.A., Levissima as part of the sharing of water resources with the Municipality of Valdisotto, through the protection with a cliff with large blocks and the structural reinforcement of the masonry and the roof, as well as an improvement in waterproofing. The collection point on the slope, about 10 m upstream of the spring, has not been modified.
For the safe water supply downstream, Sanpellegrino Levissima installed a multilayer food-grade pipe certified for food use, which must be connected to use.
A rather high low flow rate of the spring was found, again > 4 l/s. The spring is intended to increase the availability of water for public drinking use.

Progetto PRESURINE and progetto PRESURINE 2.0: : The Presurine springs 1, 2 and 3 are historically municipal springs..
The three springs, in the period 2003/2006 were completely renovated by Sanpellegrino through works of complete collection of the available water (which was previously largely lost) and general hygienic arrangement of the area concerned.
A portion of water equal to 5 l/s is used by Levissima as mineral water (after completing the authorization process) and the rest of the resource is used for public aqueducts. The Presurine 1 spring is located in an isolated position above the Presura local road, while the Presurine 2 and 3 springs are located at the head of the Presurina valley. The present restoration project concerns the area of the Presurine Springs 2 and 3.
In this area there have been some surface gravitational instabilities along the access road to the P2 spring, on a very steep slope, instability that can create risk situations for the operators of Levissima and the aqueduct operator, but also for the quality of the water.

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

Comment

The site has identified several actions with a specific focus on actions to improve.the management of water quantity.
The site studied the implementation of actions that can be classified as best practices shared with the involved stakeholder.
The projects can be classified as best practice as they are shared with a qualified stakeholder of a top scientific level.

One of the main projects related to the control of water quality is:

Progetto SANTA MARIA : The side affected by this project was affected in autumn 2018 by the so-called Vaia Storm, which caused the fall of many plants over large areas within which there was a zeroing of the forest cover.
In the months following the dramatic event, the Alta Valtellina Forestry Consortium partially recovered the crashed timber, however, there is still woodland, and in particular in the area of interest unstable plants and partially uprooted, as well as a part of the twigs, and stumps in some cases of considerable dimensions.
In general, the lifting of root plates related to the crashes of single trees and the subsequent overturning of the stumps released as a result of the previous works arrangement of the area has led to the creation of holes and the alteration of the water regime with the consequent triggering of hydrogeological instability phenomena due to accumulation and excavation.
Once the cutting and removal of unstable and wooded plants and stumps has been completed, and residual organic material, the slope is restored, with the of a small landslide niche (description follows), and to the safety of some very fractured rocky areas, over which a sheet will be placed
waterproofing and a provisional retention net, which will be followed by greening In correspondence with the collection works, it will also be restored
local waterproofing immediately upstream of the individual springs, damaged by the events related to storm Vaia
During the waterproofing works, the springs will be drained to avoid possible interference (turbidity) due to the works.

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

Comment

The site has identified several actions with a specific focus on actions to improve the management of its IWRA.
The site studied the implementation of actions that can be classified as best practices shared with the involved stakeholders.
The projects can be classified as best practice as they are shared with a qualified stakeholder of a top scientific level such as he University for Environmental Science and Policy.

Progetto UNIMI: Thanks to Levissima's support for glaciological research, it was possible to continue with the monitoring activities of the Alpine glaciers of Lombardy (and beyond) in the three-year period 2020-2022, which saw the involvement of numerous Italian and foreign researchers.
A comparative study of snowmelt mitigation techniques applied on the Dosdè and Presena Glaciers has been published for the first time in Italy (i.e. Senese et al., 2020a). This study began in 2008 thanks to the contribution of Levissima.

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

Comment	The site has identified several actions with a specific focus on actions to improve the management of its WASH, including the certification of its EMS according to IAO 14001 based on a target and improvement plan. The site studied the implementation of actions that can be classified as best practices shared with the involved stakeholders. The projects can be classified as best practice as they are shared with a qualified stakeholder of a top scientific level such as the Valdisotto Municipality and the local Water Public Company. There are specific projects related to catchment WASH services: TIOLA SPRING – Construction of a new spring for public water supply. Levissima has always contributed to the potable water supply to Valdisotto municipality (where Levissima mineral water concession is located). Close to the Tiola village, after hydrogeological surveys, Levissima has built a new spring. The spring is located at a height of 1525 m asl. The water capture is made by seven drain holes. The shallow portion of the drain is protected by means of a cemented casing, 10 m in length. The flow rate is very high, and Tiola Spring supplies not only Tiola and Santa Maria Maddalena, but most of the municipality. Tiola Spring is one of the most important public water supply resources at Alta Valtellina. INDIRECT BENEFITS: The groundwater captured by the spring, is part of water that circulates at the basis of a DGPV (deep gravitational deformation of the slope). The drainage of water from the basis of the ancient landslide improves the general stability of the area. Major water stewardship initiative, municipality people are beneficiaries, very high shared water challenge in the Levissima concession area. Progetto MASSANIGA: Revamping and securing the public water source Progetto PRESURINE: and PRESURINE 2.0 – Improvement and refurbishment and security of the water sources

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*

2.1.1 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Yes

Comment: The site has published its statement signed by the new factory manager on the web page

https://www.sanpellegrino-corporate.it/sites/default/files/2024-07/Lettera%20Commitment%20Levissima_0.pdf

The Sanpellegrino Levissima site statement should be read in conjunction with the global Nestle Water commitment to water stewardship:

hhttps://www.sanpellegrino-corporate.it/sites/site.prod1.sanpellegrino-corporate.it/files/2023-06/NESTLÉ%20WATERS%20PUNTA%20A%20UN%20IMPATTO%20IDRICO%20POSITIVO%20_3.pdf

They include the listed commitments, are signed and publicly disclosed: The two letters are published together on the website and made available on the site communication boards.

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 organization chart identifies responsible persons/positions within the facility's organizational structure with a focus on the H&S management system. A signed and publicly disclosed site statement of the organizational document has been defined.
The Site Manager is the only mandated representative regarding legal issues.
The SHE team manager reports directly to the site factory manager who is the responsible person for the factory's legal environmental compliance including water and wastewater management. All official communication with regulatory agencies is prepared by the SHE manager but officially signed and in the name of the factory manager.
A very strict management system is in place to ensure that all environmental permit renewal or periodical data submissions to the regulatory agencies are performed correctly and on time (a requirement also covered by the 14001 certified management 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	A water stewardship strategy statement signed by the factory manager was provided and reviewed. At a group level Sanpellegrino SPA strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements and Group Policy. The local strategy is a consequence. There is coherence between the Targets and Actions described in the WSP and the overarching mission, vision, and goals described in the Water Stewardship Strategy. The AWS Factory plan is in coherence with the high-level strategy.	
2.3.2	*A water stewardship plan shall be identified, including for each target:* *- How it will be measured and monitored* *- Actions to achieve and maintain (or exceed) it* *- Planned timeframes to achieve it* *- Financial budgets allocated for actions* *- Positions of persons responsible for actions and achieving targets* *- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.*	Yes
Comment	A detailed Water Stewardship Plan was created as part of the AWS process. The plan details for each water challenge several related risks and opportunities named as projects with measurable AWS outcomes. Each project or target contains detailed info such as actions to achieve, maintain, update, name of the responsible person and owner, timeline, and budget. A section is dedicated to continuous monitoring with periodical evaluation with KPI, ongoing and final evaluation by the AWS team.	
2.4	*Demonstrate the site's responsiveness and resilience to respond to water risks*	
2.4.1	*A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	Yes

Comment	The Site has included in its Water Stewardship Plan a plan to mitigate water risks identified for the main water risks shared with the stakeholders and above listed,. For each project, the involvement of all interested parties is clearly defined as well as possible consequences on water quantity (availability) or quality. For example. Project Vaia: The intervention is part of the broader "Vaia - Water Regeneration Project", promoted by the Levissima Group with the involvement of the University of Milan and Consorzio Forestale Alta Valtellina, with the aim of restoring the functionality of the woods of the Municipality of Valdisotto damaged by the Storm Vaia and the subsequent secondary damage due to the proliferation of the Ips bark beetle typographus,. The risk is related to the presence of fallen trees as it was not possible to completely remediate the areas and numerous small groups of crashed plants remained on the ground. Starting from these nuclei then manifested secondary damage due to the proliferation of the Ips bark beetle typographus, which is currently of some concern because the infestation with part of the parasite does not tend to decrease, continuously affecting new healthy spruce surfaces. The response to mitigate the risk are: 2023 Action Plan: reclamation of part of the area 2024 Action Plan: Reclamation of part of the area, removal of widespread uprootings and replanting The water quality was strictly monitored and there were no problems in the results of the analysis always performed for monitoring the situation. The full project documentation was provided by the site.

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 provided documentation of its efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies, and continuing to expand education on AWS and outcomes toward good water governance. This was confirmed during the auditor stakeholder interviews.
The site has identified the following shared water challenges related to governance:

Climate Change: Extreme weather events - Storm Vaia (2018): Degradation of the forest cover of the mountain slope potentially exponential due to the spread of the bark beetle. Vaia Project in partnership with the municipality of Valdisotto and the Alta Valtellina forestry consortium.

Abandonment of the mountain by residents and the impact of unsustainable tourist development. Limited economic and social development of the territory. Levissima Regeneration communication campaign.
A fitness trail made of recycled material will be installed in the Cepina recreational park. In 2023 the campaign "The Keys to Regeneration" with Francesca Michelin. Preparation of docufilms conveyed on social media and on the Levissima website to promote sustainable use of the mountains.

Supply of drinking water to the Municipality of Valdisotto: Presurine Project: - Modernization of the collection structure and related structures - Transfer of the source to the Municipality and, subsequently, to the municipal company (SECAM) for management. Support the Municipality in obtaining authorizations. An agreement that provides for the use of 5 l/s for mineral purposes has been signed.

Supply of drinking water to the Municipality of Valdisotto Massaniga Project: modernization and safety of the public spring against possible landslides, improvement of the collection chamber, and replacement of the pipes to the aqueduct.

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 highest part of Valtellina is a highly populated area. The site is in the vicinity of Bormio, a well-known sky and touristic place where the 2026 Winter Olympic Games will be hosted.
The site made an effort to identify any water rights not covered by law but no special points were disclosed.
The water rights for local people are guaranteed by Italian laws and they are mentioned as a point of interest in the San pellegrino policy.
The AWS system helps to keep a special focus on specific topics:
- Compliance with the requirements of the concessions (Flow rate and buffer areas) as the water flowing from the springs is a common good and must therefore be respected;
- Compliance with the parameters of the discharge water from the site in order not to create pollution issues in the subsequent uses of the Adda River water downstream of the site.

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.* 🔍 Obs.

Comment

The site has developed a comprehensive legal register.
Every year an internal audit on legal compliance is performed as a requirement for the 14001 certifications followed by the third part EMS audit; the Bureau Veritas certification audit, although cannot be considered a legal compliance audit, gives anyhow an evaluation of the internal management of the compliance level.
An internal group audit is also performed with the issue of a NER Nestlé Environment Requirement Self Declaration.
Every 3 years an audit classified as NIA (Nestle internal audit) is performed by an intergroup team highlighting findings in case of negative evidence.
There is a legal compliance form covering all scheduled activities for E&HS.

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 outside the site (within the catchment) are guaranteed by law and provided by public service. Sanpellegrino Levissima's influence can only be related to the correct management of environmental requirements regulated by the AIA (site wastewater discharge) or by the mineralized water concessions.

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

There are no concerns with the water balance at the catchment.
The site has complete control of its water balance mainly related to its primary production of mineralized water. There is no problem or shortage of water available both for production and site utilities.
The Nestle Group water balance target is focused on a final total compensation of water consumption applied in the Sanpellegrino Levissima site in two major projects:

1. At each CIP there are mineral water flushes (with consequent production of wastewater). The concentration cycles of the evaporative towers are not optimized resulting in industrial water waste. The main project is developed in two phases: optimization of mineral and industrial water consumption through the recovery of water, flushing, and tank bottom and its subsequent reuse for the CIP and for feeding the evaporative tower circuit. The activity for 2024 is the feasibility study and concept design. The expected savings are 18,000 m3/year of mineral water and the transition from 2 to 12 cycles on the evaporative towers with consequent savings to be quantified. To date, the project has been evaluated at 40% on time with forecasts.
2. The actual use of water related to the steam production process (purges, leaks, and blowdown) is not optimized. The project will improve the management of the thermal energy of the plant (steam elimination) with a consequent reduction of industrial water emitted; the expected saving is -4000 m3/year of industrial water (steam saving) To date, the project has been evaluated at 30% on time with forecasts.

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 Levissima site is located in an area without water scarcity.
Anyhow, the site has set targets to reduce water consumption annually and improve the ratio of bottled water/service water. The value by comparison to other Nestlè Water sites is already very good since the dismantling at the site of the returned glass bottle washing.
The water consumption for the bottling is under control with a KPI. The total site water consumption split for the different sources and uses is monitored.

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

Sanpellegrino Levissima site identified one project to reallocate water to the local population by continuing to ensure the maintenance and improvement of the Presurine springs and their technical equipment.
The project of water exploitation improvement is regulated by an official agreement with the Valdisotto municipality, which can be defined as a legally binding document.
In the Levissima mineral water concession area, Presurine 1, 2, and 3 springs were in a state of complete decadency, and not used for public water supply.
The three old municipal sources were completely rebuilt by Sanpellegrino Levissima, deepening the water binding point in the subsoil and collecting all the available groundwater.
Works concerned the demolition of ancient springs and their rebuild. The discharge rate increased to a minimum of 11-16 L/s. At a lower level, a new technical building has been built (by Sanpellegrino). In this building, there is the pipeline collecting the three springs (and there is also the arrival of the pipeline coming from the Tiola area to supply the northern part of the municipality area). A total of 5 L/s of water coming from Presurine Springs is due to SP against payment of the fee (with a special agreement with the municipality). The estimated minimum flow from Presurine Springs to public water: 240 Mio/L/y (8 L/s)

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 from the authorized water outlet effluent is 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.
The progress towards the respect of the water quality targets is kept under control in the management review.

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

The effluent quality at the different outlet-authorized discharge points is constantly monitored and legally compliant with the AUA environmental permit requirements, and there are no relevant trends.
Since the quality of the discharge currently fully complies with the required limits, and there is no technical indication towards a higher quality of the outlet flow, this possibility is considered but evaluated as not applicable in a short time.
There are no shared challenges in terms of water quality both in the inlet flow from the concession area and in the receiving water bodies.

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

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

Yes

Comment

The IWRA identified within the catchment and taken into consideration in the Water Stewardship Plan with specific actions are:
Awareness of the effects of climate change on glaciers: understanding the impact of climate change on glaciers and water reserves and action was taken by the University of Milan Department of Glaciology.
Awareness of the effects of climate change on the ecosystem and biodiversity: Promoting the territory and respect for nature Partnership with Stelvio National Park - education & scholarships (Trudi project);
- Measuring the effects of climate change and extreme events (Vaia) on biodiversity.
- Funding of study projects at the University of Milan

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.*	Yes
Comment	The provision for WASH access to all workers inside the site is granted by law and it is not a potential problem in the Site location. The drinking water is available to everybody throughout the site with local dispensers and bottled water which is provided in unlimited number for the use of the employees. The site continuously controls the quality of the distributed water in terms of potable characteristics and legionella. Good provision of sanitation services was observed on site. The number and quality of changing rooms and toilets were checked during the site visit.	
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	The respect of human rights related to access to WASH for local communities within the catchment granted by law and it is not a potential problem in the Site location. The site is not impinging on the human right to safe water and sanitation of communities through its operations.	
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 is no relevant supplier's company located in the catchment. Nevertheless, Sanpellegrino Levissima started in cooperation with Nestlè Water a project to involve all the major suppliers (also not directly located in the relevant catchment) in the correct water management related to their production.	
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	There is no supplier resident in the catchment. There is no relevant company located in the catchment. Nevertheless, Sanpellegrino Levissima started in cooperation with Nestlè Water a project to involve all the major suppliers (also not directly located in the relevant catchment) in the correct water management related to their production. A meeting was performed with CDS Smith (packaging supplier)	
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.*	N/A
Comment	There is no shared 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.*

Yes

Comment

The site water department, in cooperation with the Nestlé Group Water department, is always working to implement the best practices related to water governance (see 1.8.1).

The site organizes regular meetings with the local water public authority demonstrating support for good water governance and stewardship with appropriate authorities and stakeholders.
The site participates in a global Nestle working group: the Gruppo Nestle - Water dpt monthly meetings with an exchange of experience on water management, internal benchmarking, comprehensive water stewardship
This includes documentation of best practice actions, the benefits, and detailed approaches to implementation, to enable other sites to do the same.
The site always maintains the certification for its Environmental Management system according to ISO 14001:2015.

The site keeps efforts toward achieving best practices with continuous support to the project: (Governance) Progetto IUSS CLIMATE: in cooperation with Scuola Universitaria Superiore - Pavia . Increased temperatures, altered precipitation patterns, and more frequent extreme weather events can affect mountain environments, leading to profound ecological and socio-economic consequences. Sanpellegrino Spa undertakes to pay IUSS € 18,000.00 for the co-financing of the PhD course on National Interest in Sustainable Development and Climate Change. These funds can be used by the IUSS School for co-financing a research grant on: "Climate Change in the Alps: High-Resolution Modeling and Socio-Economic Impacts in Alta Valtellina", for three years

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

Yes

Comment

The main projects put in place towards achieving best practices towards an efficient water balance are:
Progetto PRESURINE and progetto PRESURINE 2.0: Progetto MASSANIGA: (see 1.8.2)

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

Yes

Comment

The site implemented some steps to implement its best practice-defined objectives.
For example:
Progetto SANTA MARIA: see 1.8.3

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.*

Yes

Comment

One of the projects related to IWRA is related to the glacier life with the University of Milano.

Progetto UNIMI:
The research activities also continue, made possible thanks to the help of drones that since 2014 have made it possible to quantify the intensity and speed of changes to the front and surface of glaciers.
The University of Milan, using high-resolution orthophotos, thanks to Levissima's contribution, produced in 2015 and updated in 2016 the New National Glacier Cadastre, an inventory that describes the 903 glaciers in Italy. The results of this study have also been included in an international scientific publication.

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

Yes

Comment	The action to achieve a WASH objective is the following project: TIOLA SPRING – see 1.8.5

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.*	Yes
Comment	For all the projects detailed in the AWS Plan, the site keeps control of its progress and performance against each quantified target with Monthly meetings. During the meeting, an update covering the AWS system with a focus on data and the project's advancement is discussed and evaluated. A comparison between the achieved and the expected results is performed to evaluate the efficiency of the project against the expected targets. The management of each project is done with an internal project management tool shared with all the Nestlé Water Group departments. The process owner presents the progress of the project to the Management and the Water team. Some projects have a duration of more than one year: in this case, intermediate steps are defined to monitor the progressive steps of the projects. When a specific CAPEX is related to an objective, an evaluation of the milestones is also carried out. There is a procedure for managing CAPEX: appendix 5 relates to environmental and sustainability evaluation. For other projects, the SHEPM methodology specific to the Group for sustainability projects is used.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Yes
Comment	In the AWS plan, the cost for each objective is defined and approved by the top management as a budget before starting operations on it. The goal (i.e.: water consumption reduction, construction of a new sewage system) is clearly indicated. For each target, an evaluation in terms of a financial cost-benefit is not completed yet, as the system has just been implemented. The indicator will be investigated more in future surveillance audits.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Yes
Comment	Some projects contained in the AWS plan will bring a benefit to the community. According to the general environmental approach of Sanpellegrino Levissima a special focus is also dedicated to CO2 emission reduction: the water savings projects can also contribute to this project. For each target, an evaluation in terms of a financial cost-benefit is not completed yet, as the system has just been implemented. The indicator will be investigated more in future surveillance audits.	
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

The Site Manager declared that in recent years no environmental (including water management) emergency events have been recorded.
In accordance with the internal system procedures (for emergency management, NC, CA, and PA procedure; business continuity plan), the episode would be recorded and the root causes evaluated. Where applicable, a subsequent corrective action is put in place which will help prevent future occurrences.
Should an emergency present, it would be analyzed in the Management Review.
A BCP plan is in place to define rules and actions in case of a shutdown due to major flooding.

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

As part of Nestle Waters' commitments to Creating Shared Value and Water Stewardship, community relations are a key pillar of the Company's local strategy. Developing and maintaining good relations with local communities living next to Nestlè WAter sites, through listening, monitoring, dialoguing, and responding to their concerns, is a key prerequisite to local acceptance and long-term growth.
To structure and improve its relations with local stakeholders, Nestlé Waters has developed the COMMUNITY RELATION PROCESS (CRP) 3.0,
The tool proposes a methodology of 5 stages: mapping of stakeholders, internal diagnosis, external diagnosis, action plan, and evaluation. In 2024 a survey was run by DOXA (750 interviews in total for the four sites) with an evaluation of the Local Acceptability Index.
A detailed report prepared by DOXA covers the measurement of how Stakeholders experience the reality of the factory on the territory, on more general topics of factory impact on the territory including site water management. The results are very positive are very positives for all the sites including Levissima.

Another tool for consultation and presentation of the WSP projects is planned with the main SHs Meetings have already been planned for the second part of 2024 by the factory manager, while for updates on the progress and results of individual projects, communication is continuous with the help and coordination of the Group support. The Site has engaged in active communication with the main stakeholders to be repeated once a year to communicate and review its water stewardship performance and share with them the site's performance.
This consultation is finalized to confirm shared water challenges and Important Water-Related Areas in the catchment. The form of the consultation is appropriate for the local context.
The consultation is made directly by the Site manager with the top representative of the stakeholders: the results are recorded on an interview checklist for future reference. In 2024: 10 interviews were recorded.

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

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

Yes

Comment

The WSP is kept updated at every management meeting. For each project, there is an evaluation based on an approach to a lesson learned.
The previous revision of the files is available as a record.
Any change on a project is indicated, discussed, evaluated, and agreed and the plan is changed accordingly.

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.*	✓ Yes
Comment	The Site has an organization chart with the people named in a hierarchy relating to the governance of environmental matters including the water issues and AWS responsibility. A second organization chart is issued related to HSE. The charts are disclosed in the internal intranet and published in the internal communication board. A dedicated team is nominated for the implementation of Standard AWS- international water stewardship standard All legal environmental responsibilities are in the position of the Factory Manager (S.M) as stated in an official delegation of power.	
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	External communication is regularly issued according to the Communication process. Sanpellegrino Sustainability Report at the Group level is published every year. The water stewardship plan, including its contributions to AWS Standard outcomes, is communicated to relevant stakeholders. The feedback is kept under control by analyzing the results of the interviews with Stakeholders done by the site manager: they confirmed that the site keeps an active communication related to the implementation of the AWS outcomes. The dedicated central office in Milan, covering four sites, manages external communication through press releases, publications, and local presentations with interested parties to support local communication. The group produces an aggregate sustainability report available at this link: https://www.sanpellegrino-corporate.it/it/news-media/press-office/sustainability-report-2023. The AWS Levissima project and challenges were shared with the external stakeholders in a presentation meeting held on June 19, 2024. While a general meeting dedicated to all internal staff was held on June 18.	
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.*	🔍 Obs.

Comment	The site will produce a summary of their annual WSP performance in an abstract of the WSP. This includes quantified performance against targets, which will be communicated to interested stakeholders. General information on the AWS system is given in the internal communication periodical news, in the internal standard communication channel, and on the site general presentation used for clients and guests. The Sanpellegrino Sustainability Report 2023 contains info on water consumption, on the commitment to water stewardship. .
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.* Obs.
Comment	The site shared water challenges, including associated efforts to address the challenges; engagement with local authorities, public-sector agencies, other local companies, organizations, and community groups in the area, and other companies within the Nestle Water group. As an example of the activities carried out in the period 2023 to 2024, we can mention: the collaboration with the Ravasio Foundation for the awareness of the community living in the area adjacent to the site on issues related to water through the sponsorship of puppet shows for children in the main municipalities of the valley. Over 500 people participated in the shows provided; Post-evaluation and feedback collection are ongoing. Collaboration with the Municipality for the enhancement and increase of tourism in the area is also linked to the mineral water resource Several meetings have been held, the last of which was in August 2024 on this topic. The Sanpellegrino Water Team always organizes activities for World Water Day, and the Ruspino site always attends and is involved in the planned activities.
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* Yes
Comment	Efforts have been made by the site to engage stakeholders and coordinate and support public-sector agencies in collectively addressing shared water challenges. For all the projects contained in the WSP and here above described, several meetings were performed and where necessary recorded.
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	No water-related compliance violations have occurred in the 2023-2024. In case of any violation, the point will be evaluated at the most relevant Company level and recorded as a NC.
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* Yes
Comment	The requirement was evaluated but there is no violation 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	The requirement was evaluated but there is no violation recorded.

Photographic Evidence from Audit

Yes

5 Adda river downflow the factory.jpg

2 mineralized water spring.jpeg

8 liquid dangerous waste secluded deposit.jpeg

1 mineralized water spring.jpeg

9 chemicaò storage at waste water section.jpeg

7 chemical storage.jpeg

6 chemical storage.jpeg

4 VAIA Project recovered area.jpeg

3 internal of a mineralized water spring..jpg

Upgrade or Downgrade of Certification

Justification for Upgrade or Downgrade

Summary of Evidence which led to change

Previous Findings

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

N/A