CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001366

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Boehringer Ingelheim Spain - Barcelona**
Address: Carrer de Prat de la Riba, 50, Sant Cugat del Vallès, 08174, Barcelona, SPAIN
Contact Person: Monica Sanchez Ruiz
AWS Reference Number: AWS-000643
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Feb-28
Validity of certificate: 2028-Feb-27

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Nov-26
Lead Auditor: Juan Gorostidi

Audit team participants:
JOSÉ MANUEL GONZALEZ, Other

Site Participants:
Mercedes Morell, Production manager
Sergio Perez, Other
Amanda Gilabert, Other
Eduardo Lecea, Other
Sandra Duran, Human Resources
Hector Constenla, Other
Vasileios Markantonis, Other
Mónica Sanchez, Other
Javier Salvatierra, Other
David Corbella, Other
Josu Garcia, Other
Rubén García, Other

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 2 minor non-conformities and 2 observations were raised.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report, by 27 February 2025.

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

The audit team recommends the certification of Boehringer Ingelheim Spain – Barcelona at Core level pending approval of the corrective actions plan to close the non conformities.

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.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001366

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Boehringer Ingelheim Spain - Barcelona against the AWS International Water Stewardship Standard Version 2.

Boehringer Ingelheim Spain - Barcelona is a company dedicated to the pharmaceutical industry (production of medicines) and it is located in Carrer de Prat de la Riba, 50, Sant Cugat del Vallès, Barcelona.

Boehringer Ingelheim Spain has two pharmaceutical production plants in Sant Cugat (Catalonia):
- A plant for the manufacture of injectable and oral products (capsules and, in the future, antidiabetic tablets).
- Another plant is dedicated to the manufacture of aseptic cartridges and the packaging of the RESPIMAT® product range (inhalers).

In both facilities, Boehringer Ingelheim incorporates the latest technologies and new production concepts, with integrated and process-oriented systems.

The site is located in the Besòs River basin. The water consumed by the site comes from the Ter River basin and the discharge water reaches the Llobregat River.

The Besòs River basin, where the site is located, lies immediately to the north of the city of Barcelona, encompassing part of its metropolitan area. Its surface area, approximately 1,024 km², extends across the counties of Vallès Oriental and Vallès Occidental, as well as part of the Osona region.

The basin consists of an alluvial plain—with heterogeneous granular material ranging from silt to gravel—enclosed between the Coastal and Pre-Coastal mountain ranges, the Sant Llorenç hills, and the foothills of Montseny.

The audit was conducted onsite from 26 to 28 November 2024.

The onsitesite visit included the assessment of:

Production plants (Respimat and injectable and oral products).
Water supply connection.
Wastewater treatment plant.
Discharge of treated water.
Gardens.
Storage tanks and water treatment infrastructure (softened water, reverse osmosis, etc.).
Storage of hazardous and non-hazardous waste.
Wash facilities (restrooms, showers, etc., for workers).
Cooling towers.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	2
Minor	2

FINDING DETAILS

Finding No:	TNR-016026
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:	The site clearly identified the quality data available for the different water bodies in the catchment. It would be relevant to extract and summarise the data of the specific ultimate water source and ultimate receiving water bodies to show acknowledgement of existing quality issues.

Finding No:	TNR-014540
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	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.
Findings:	The site has identified and mapped the Important Water-Related Areas (IWRAs), including watercourses, reservoirs, protected natural areas, and Natura 2000 Network sites. For the evaluation of their status, data based on official sources regarding watercourses and reservoirs has been presented. However, no information has been provided on the status of protected natural areas or Natura 2000 Network sites, as the corresponding analysis has not yet been completed.
Corrective action:	Information on the status of protected natural areas or Natura 2000 Network sites, and subsequent assessment/analysis, has been included in the list of IWRAs identified and mapped for the site.
Evidence of implementation:	Please see the updated maps and the Excel file attached. In the Excel file, the sheet "Red2000" the updated informations has been include in columns G, H, I, J, K. The sheet "ANF" the updated informations has been include in columns E, F, G, H, I. And in the "RAMSAR" sheet, the updated informations has been include in columns E, F, G, H.

Finding No:	TNR-016027
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site should be careful to clearly separate risks that might occur to the site (i.e. water supply stop, unidentified water costs,...) that are related in 1.7.1 from shared water challenges that are shared with other stakeholders.
Finding No:	TNR-016032
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Although the site's water management plan is clearly structured and its objectives are aligned with sustainable water management principles, only Objective 1 (Reduce the site's total water consumption by at least 15% by 2030) is measurable and meets SMART criteria. For the remaining objectives in the plan, measurable targets have not been defined to indicate the targeted level of improvement that the site wants to achieve, and to enable effective monitoring of their progress.
Corrective action:	Review of specific objectives to include SMART criteria and update the strategy and plan accordingly.
Evidence of implementation:	Please see the updated "Water Stewardship Strategy" sheet on raw 19 about "Specific Targets"; and the column B on the "AWS Action Plan" sheet from the attached Excel file.

Report Details

Report	Value
Report prepared by	Juan Gorostidi Colas
Report approved by	Lorenzo Brioschi
Report approved on (Date)	27/01/2025

Surveillance

Proposed date for next audit
2025-Nov-26

Comment It is an initial audit.

Stakeholder Announcements

Date of publication	Location
01/11/2024	AWS website
	Boehringer Ingelheim Website

Comment AWS published the stakeholder announcement on its website in November 2024: https://a4ws.org/wp-content/uploads/2024/10/AWS-000643-Boehringer-Ingelheim-Spain-Barcelona-StakeholderAnnouncement-November-2024-V3.0.pdf

https://www.boehringer-ingelheim.com/es/gestion-sostenible-del-agua

Catchment Information

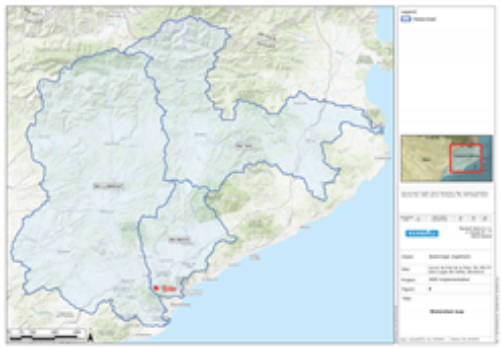

Figure - Catchment.jpg

Catchment Information

The Besòs River basin, where the site is located, lies immediately to the north of the city of Barcelona, encompassing part of its metropolitan area. Its surface area, approximately 1,024 km², extends across the counties of Vallès Oriental and Vallès Occidental, as well as part of the Osona region.

The site is located in the Besos River basin. The water consumed by the site comes from the Ter River basin and the discharge water reaches the Llobregat River.

The basin consists of an alluvial plain—with heterogeneous granular material ranging from silt to gravel—enclosed between the Coastal and Pre-Coastal mountain ranges, the Sant Llorenç hills, and the foothills of Montseny.

The water comes from the municipal water company (AGBAR), specifically from the Drinking Water Treatment Plant from Ter (Cardedeu, Catalonia). AGBAR is the public-private company responsible for wastewater sanitation and treatment services, ensuring its return to the natural environment or its reuse. It provides services to nearly 3 million people with complete health guarantees in the municipalities of the Barcelona metropolitan area.

The water reaches the site through a supply pipe connected to the municipal network, just like the drinking water consumed in the region.

Client Description and Site Details

Site layout.jpg

Figure - Site boundaries.jpg

Client/Site Background

Boehringer Ingelheim Spain - Barcelona is a company dedicated to the pharmaceutical industry (production of medicines) and it is located in Carrer de Prat de la Riba, 50, Sant Cugat del Vallès, Barcelona.

Boehringer Ingelheim Spain has two pharmaceutical production plants in Sant Cugat (Catalonia), both located in the same site:
- A plant for the manufacture of injectable and oral products (capsules and, in the future, antidiabetic tablets).
- Another plant is dedicated to the manufacture of aseptic cartridges and the packaging of the RESPIMAT® product range (inhalers).

In both facilities, Boehringer Ingelheim incorporates the latest technologies and new production concepts, with integrated and process-oriented systems.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The identified water challenges include:
1. Water availability (scarcity):
o Production disruptions due to lack of water supply.
o Increased costs for water procurement, treatment, and transportation.
o Compliance with stricter regulations during scarcity, which may require costly adjustments.
o Supply chain impacts affecting raw materials and transportation.
o Reputational and sustainability risks if not addressed appropriately.
o Need for investments in more efficient technologies or alternative water sources.
2. Water quality:
Contamination of distribution systems by chemicals, biotoxins, pathogens, or radionuclides can cause economic damage, injuries, or fatalities.
3. Extreme natural events:
Events such as earthquakes or pipe freezing due to extreme cold may damage water infrastructure. However, the site is considered to have low vulnerability to earthquakes and flooding.
4. Water costs:
o Lack of full understanding of all water-related costs, including cooling water and off-site transport.
o Risks of increased fees for water use and treatment, higher costs for desalination solutions, and restrictions on certain water and energy uses.
5. Flooding:
According to the National Cartography System and Flood Zones (SNCZI) and the Catalan Institute of Cartography and Geology, the site is not located in a flood risk area (risk exceeding a 500-year return period). The nearest flood risk area is 2.3 km west of the site. Based on this distance, location, and topography, climate change is not considered to increase flood risk significantly. No flooding events have been reported at the site.

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	Both the potable water connection, supplied by the municipal company SOREA, and the discharge of treated water at the outlet of the wastewater treatment plant were inspected during the audit.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site occupies one catchment, the Besós River catchment, in Catalunya.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	The site and scope of the proposed certification is under the control of a single management system.	
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 and scope of the proposed certification is homogeneous with respect to the primary production system, water management, product range and the main market structures.	

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes
Comment	All the different indicator-specific maps have been uploaded. In addition, the site has detailed plans of the water network system (sanitation, process, irrigation, etc.). The following documents were checked by the auditor: Map of the basin and sub-basins (Llobregat, Besos and Ter). Map of the discharge point, waste water service provider and ultimate receiving water body or bodies (Llobregat river and Waste Water Treatment Plant of Rubí). Map of Physical scope (area of influence) Municipality borders, drinking water treatment plants (DWTP), Waste Water Treatment Plant of Rubí (Catalonia) and Site. Map of site boundaries: Geographic site location. Map of water service provider, including: Ter River, Site and Drinking Water Treatment Plant from Ter (Cardedeu, Catalonia). Map of Water storage area and Wastewater treatment plant Map of infrastructures of the site (general layout). Map of the basins: Water source: River Ter. Site: Besos Basin Discharge: River Llobregat.	
1.2	*Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*	

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

Comment

A list of evidences of stakeholder engagement activities that have been carried out over the past few months was provided by the site.
These actions can be divided between direct communications with key stakeholders (letters) and public communications/disclosure at events (such as the roundtable or the water scarcity forum held at BI's facilities).
In addition, there is other evidence of BI communicating about its practices on water stewardship issues at other events.
Finally, the EHS Manager (Monica) has informed internally about the progress of the AWS implementation bimonthly in order to engage all the departments and the managing board in the water related tasks.
The site has provided an Excel file named 1.2._Stakeholders_analyisis_matrix_10_2024 containing the following information:
• Stakeholder
• Description
• Categories:
o Academic institutions
o Authorities
o Companies within the same catchment
o Internal
o Press / media
o Pressure groups / NGO's
o Society
o Suppliers
• Classification:
o (1) Those who impact on the organization;
o (2) Those on whom the organization has (or is perceived to have) an impact;
o (3) Those who have a common interest;
o (4) Neutral - those with no specific link, but with whom it is relevant to inform.
• Level of influence: 2,3 or 4.
• Level of interest: 2,3 or 4.
• Result: from 4 to 16.
• Priority:
o Facilitator
o Key stakeholder
o Primary stakeholder
o Secondary stakeholder
o Stakeholder´s role is not identified
• Water related challenge:
o Concern for the continuity of the site's productive activity and therefore, the business sustainability.
o Concern for water resources in a context of global warming and increasingly recurrent and intense periods of drought.
o Interest in expand the sustainable water managementy practices along the private sector in Catalonia.
o Interest in learning about water management by private companies and especially industry in order to broaden their knowledge.
o Interest in local environmental issues, among which water has been a topic of major interest in recent years for the Catalan population and therefore a focus for media research.
o Interest in protecting the resource and making responsible use of it, which is the basis of their economic activity.
o It enforces to the sustainable use of water in a critical situation for its users (population, industry, agriculture).
o It enforces water management legislation in order to protect the resource and make sustainable use of it.
o Local NGO with an interest and concern for the use of water by private companies in Catalonia.
o NGO with an interest and concern on the environmental impacts generated by private companies globally.
o Supplier of raw materials in the same catchment (same water stress risk).
o They are interested in better understanding the water management of all users in their water

network. In addition, they may have a special interest in stakeholders who are keen to improve their water management.
o They expect BI to act responsibly with the environment and ethically with the society.
o Those industrial companies with an intensive use of water (such as an agro-food industry) will have a special interest in preserving the sustainable use of water from their competitors of the same catchment.
• Online information
• Contact
• "1st Contact [Information on AWS implementation]"
• "2nd Contact [Information on AWS action plan]"
• "3rd Contact [Information on AWS performance]"

Moreover, the following documents were checked by the auditor:
2024_02_16_Jornada Buenas Prácticas Gestión Agua_BI v3 and Llistat dinscripcions: Power Point presentation of the conference on Good Practices in the use of water dated 02/16/2024 and list of attendants.
AWS Bimonthly Status Report - October 2024, including the following information:
• Last Key Accomplishments.
• Upcoming Milestones (according to actual timeline)
• Issues, Risks and Dependences
Charter for stakeholder participation in the framework of the implementation of the sustainable water management standard - Alliance for Water Stewardship.
Sustainable Water Management Plan – Communication to stakeholders.
Communications with stakeholders: Emails are verified on:
Intention to implement the AWS standard (30/11/2023).
Communication of AWS Plan and basin challenges (5/07/2024).
Communication of AWS Plan results and next audit (15/10/2024).

The process used for stakeholder identification is detailed in the Excel file named 1.2._Stakeholders_analyisis_matrix_10_2024.

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

The assessment of the degree of influence of stakeholders is included in the matrix attached in point 1.2.
The site has provided an Excel file named 1.2._Stakeholders_analyisis_matrix_10_2024 containing the following information (as detailed in 1.2.1):
• Classification:
o (1) Those who impact on the organization;
o (2) Those on whom the organization has (or is perceived to have) an impact;
o (3) Those who have a common interest;
o (4) Neutral - those with no specific link, but with whom it is relevant to inform.
• Level of influence: 2,3 or 4.
• Level of interest: 2,3 or 4.
• Result: from 4 to 16.
• Priority:
o Facilitator
o Key stakeholder
o Primary stakeholder
o Secondary stakeholder
o Stakeholder´s role is not identified
The degree of potential influence between the site and stakeholders has been identified and included in the Excel file. The information compiled is the following:

- Stakeholder
- Description
- Categories
- Classification
- Current level of site's influence to the stakeholders
- Current level of interest
- Current level of site's priority to engage with stakeholders
- Potential level of site's influence to the stakeholders
- Type of potential level of influence
- Level of stakeholder's influence on the site
- Priority
- Water related challenge
- Online information
- Contact
- 1st Contact [Information on AWS implementation]"
- 2nd Contact [Information on AWS action plan]
- 3RD Contact [Information on the performance of the AWS action plan]

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

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

Comment

Boehringer Ingelheim Sant Cugat has four procedures about incident response plans:
- Procedure in case of soil Contamination (1_135-02-BIE-0237 Cont suelos)
- Wastewater Treatment Plan Procedure (1_135-03-BIE-0249 PAR)
- Shutter system Procedure (1_135-03-BIE-0325 Obturador)
- Contingency Plan (Plan de contingencia del suministro de agua (BI-VQD-66010-N)
Emergency plans are reviewed and their adequacy is verified by the auditor.
The environmental protection management, which is the corporate instructions regarding protocols in relation to environmental and water-related incidents, is reviewed.

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

Comment	BI Sant Cugat has conducted a site water balance, which identifies, maps and quantifies the losses, storage, and outflows and has an error of less than 5%.The 2024 balance sheet is analysed, with a deviation of 0.43% for the first half of the year (January to June).The meters take daily readings. The site's water balance (Excel file) is reviewed, and it is confirmed that the balance includes inflows, losses, storage, and outflows, all identified and mapped.

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	In the Excel file Water_balance_2022-2023-2024, the following elements are tracked: - The consumption of mains water: total and consumption per building is shown. - Reclaimed water for irrigation: which comes from rainwater from the I&O roof, reclaimed water from the steam process from boilers and autoclaves; and rejects from the respimat building. - The volumes of water discharged. It can be seen that there is a significant difference between the summer and winter months due to the greater need for operation of the cooling towers. The site's water balance (Excel file) is reviewed (see 1.3.3), and it is confirmed that the balance includes inflows, losses, storage, and outflows, all identified and mapped for 2022, 2023 and 2024. There is a water-related challenge that would be a threat to good water balance for people or environment: water scarcity, therefore annual high and low variances are quantified.	
1.3.4	*Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*	Yes

Comment	Water quality is monitored internally as follows (Water Quality monitoring program is reviewed): - The Waste Water Plant (PAR): quarterly quality analyses are carried out. - Irrigation water: quality analyses are carried out every six months. - Legionella: monthly quality analyses are carried out (All analytics are stored on the BI server and are available for review). Legionella prevention plan for the 3 buildings are attached. In addition, authorities (Catalan Water Agency) carry out random testing (All analytics are stored on the BI server and are available for review). All analytics are stored in the site archive (available). The following documents are available: Boehringer Ingelheim Sampling Plan: Includes the 2024 BOEHRINGER INGELHEIM SAMPLING SCHEDULE, with the following information: Building Type of sampling Sampling point Analytical tests Reports received Samples taken Extra analyses Legionella Prevention and Control Plan for the different buildings on the site. 1.3.4. Water Quality Data 2024: It includes the following information: PAR Analyses: Month Day BOD5 SOL (Conductivity) 25 ºC µS/cm Phosphorus mg of P/l Nitrogen K mg N2/l Total COD (not decanted) mg O2/l Decanted COD mg O2/l M.O. 2/3 Decanted COD TSS mg/l Fats mg/l M.I. Equitox/m3 Anionic surfactants (Detergents) mg/l pH AOX mg/l Phenols mg/l Irrigation water analyses: Month Day Legionella ufc SOL (Conductivity) 25 ºC µS/cm Total phosphorus mg of P/l Total nitrogen (K + nitrate) mg N2/l Chlorides mg/l TOTAL COD = not decanted (total) mg O2/l TSS mg/l M.I. Equitox/m3 Anionic surfactants (Detergents) mg/l pH AOX mg/l Phenols mg/l	
1.3.5	*Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*	Yes

Comment	The potential sources of pollution are identified and mapped through the attached documents: - Environmental aspects register (ISO 14001): identified - Soil contamination prevention procedure: identified and mapped - Environmental Due Diligence Phase I: identified - Preliminary Soil Report: identified	
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	It is verified that the site has identified the IWRAs including: - Natura 2000 Network. - Protected Natural Areas (Natural Parks, ...). - Public forests: State, Autonomous Community, local entities, ... - Wetlands. - Water bodies. - Watercourses. There is no IWRA on the site (so, no description of their status is required)	
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	There is a record available in the site of all operational costs (opex: water consumption, analytics, royalties, etc.) and those related to investments (capex). In addition, all invoices are stored in the site's archive (available for review). The document (Excel file) 1.3.7. Water related costs was provided by the site and includes the following information (costs): • Water Consumption • Quarterly declaration of the volume of water consumed to the Catalan Water Agency. • Maintenance of the shutter system • Annual contract for the calibration of equipment (flowmeter, pH probe and data logger). • Contract for PAR and Irrigation analyzes (quarterly and semi-annually respectively) and drinking water • Legionella control • Other occasional jobs • Waste management: Incineration of wastewater from washings • Water footprint assessment	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	Although WASH is considered adequate in Spain, the following evidence are provided to confirm the correct sanitary conditions in relation to water: - The analytic/potability certificate for the drinking water supplied by the bottled water company (Aquaservice) - The contract with the municipal water supply company (Sorea) which supplies drinking water. - Hygiene conditions of workers (certified by ISO 45001). The documents provided by the site are reviewed. WASH related facilities were verified during the site visit.	
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 In the first tab of the Excel spreadsheet "1.4_Indirect_water_use", the purchases of raw materials have been analyzed.
There are no purchases of primary inputs that represent more than the 5% of total annual purchases in the same catchment (Ter-Llobregat).
The embedded water use of primary inputs is detailed in the Excel file 1.4_Indirect_water_use (first
tab). The following information is included:
• Vendor name
• Categorization
• Expense 2022
• Representativity
• Country
• City
• Water stress
• Same catchment?
• Water use

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 In the second tab of the Excel spreadsheet "1.4_Indirect_water_use", the main suppliers have been analyzed.
There is only one supplier (AMBIT BUILDING SOLUTIONS TOGETHER) that represents more than 5% of the total contracts with service providers within the same catchment. This company gives IT support to BI at the site. Its water consumption comes from the employees that are located at the site, which in total are 117. So, the water consumption is 35,100L/year and has been calculated as follows:
Number of employees (117) * Water use ratio (1.25 L/day) * Working days - holidays (approx. 240
days).
The embedded water use of outsourced services is detailed in the Excel file 1.4_Indirect_water_use
(second tab). The following information is included:
• Vendor Name
• Country
• City
• Global Category
• Commodity
• Net PO Value
• Representativeness
• Same catchment
• Water use (L)
• Water quality
• Water stress

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

The following initiatives / plans were identified by the site:

- River Basin Management Plan 2022-2027: The Management Plan for the River Basin District of Catalonia is the tool that has to determine the actions and measures necessary to develop the objectives of the hydrological planning of the River Basin District of Catalonia. The Management Plan is the roadmap for hydrological planning and is fully focused on mitigation and adaptation to climate change, with the inclusion of indicators and measures that allow guaranteeing water demands as well as the preservation and good condition of the water ecosystems.
- Flood Risk Management Plan 2022-2027: The Flood Risk Management Plan (PGRI) is the instrument that defines the flood risk assessment and management measures drawn up by the various competent bodies and whose main objective is to ensure that the current flood risk does not increase, in compliance with the provisions of the RDI and taking into account the status and environmental objectives of the bodies of water. The Catalan Water Agency is responsible for preparing and coordinating the risk management assessment in collaboration with the Civil Protection authorities and the competent coastal administration. The regulations on flood risk assessment and management define a complete risk management cycle that is updated cyclically every 6 years. Each planning cycle consists of three milestones to ensure proper flood risk management.
- Drought plan: The Special Action Plan for Situations of Alert and Possible Drought (PES) is the planning instrument that foresees the rules of operation of the systems and the measures to be applied in relation to the use of the public water domain and must be activated once the Catalan Water Agency, given the established indicators, formally declares a situation of alert and possible drought.
- Specific management programme for the public sewerage systems of Catalonia 2022-2033: In order to plan the execution of sanitation works, the Catalan Water Agency is initiating the processing of a specific Management Programme for the Public Upstream Sanitation Systems of Catalonia (PGSAC) to incorporate all the upstream wastewater sanitation works and actions to be executed in Catalonia between 2022 and 2033, in compliance with the provisions of Council Directive 91/271/EEC of 21 May on urban wastewater treatment.
- Monitoring and Control Programme 2019-2024: The Monitoring and Control Programme (PSiC) is the hydrological planning instrument that defines the mechanisms necessary to obtain a general, coherent and complete vision of the status of the bodies of water in the River Basin District of Catalonia. The results of this programme allow the other planning instruments to establish the degree of achievement of the environmental objectives for each body of water and to analyse the necessary measures to be applied to achieve them, as well as their evolution over time. The results of the Monitoring and Control Programme, whether the raw data obtained in the analysis of physico-chemical parameters, of biological or hydromorphological elements, or of priority or preferential substances, as well as their integration and combination, and the final analysis of the status of the water bodies, are incorporated into the Management Plan for the River Basin District of Catalonia.

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	All legislation (European, national, regional and local) related to water management has been identified in the second tab of the glossary "1.5._Water-related_data_for_the_catchment" (1.5.2). In addition, the site has all the laws downloaded to its server. The applicable laws are detailed in the Excel file 1.5._Water-related_data_for_the_catchment (second tab). The site has identified the following applicable legislation: • Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy • Directive 2008/105/EC of the European Parliament and of the Council of 16 December 2008 on environmental quality standards in the field of water policy • Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks • Regulation (EU) 2020/741 of the European Parliament and of the Council of 25 May 2020 on minimum requirements for water reuse • Royal Legislative Decree 1-2001, of 20 July, approving the revised text of the Water Law. • Royal Decree 817-2015, of 11 September, establishing the criteria for monitoring and evaluating the status of surface waters and environmental quality standards. • Royal Decree 903-2010, of 9 July, on the assessment and management of flood risks. • Legislative Decree 3-2003, of 4 November, approving the revised text of water legislation for Catalonia. • Ordinance for Water Saving in Sant Cugat del Vallès. There are no customary water rights identified. The site has a water supply through a municipal company (Sorea) and no third parties or communal water rights are affected.	
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 water balance of the catchment is presented, as well as its official sources. The catchment water-balance is detailed in the Excel file 1.5._Water-related_data_for_the_catchment (third tab). The site has identified the following documents: • Catchment water balance (Excel file): The projections are based on data from the Catalan Water Agency. Annual and seasonal variance is estimated. • Water balance Ter Llobregat System (pdf) • Annex IV. Groundwater resources and water balance (pdf) • Status of water reserves in reservoirs • Water consumption by counties in Catalonia	
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	Links to check the status of the catchment waters live are available at: https://aca.gencat.cat/es/laigua/estat-del-medi-hidric/estat-de-les-masses-daigua/ https://aplicacions.aca.gencat.cat/WDMA/cercarDiagnostics.do The Water Quality of the Catchment is detailed in the Excel file 1.5._Water-related_data_for_the_catchment (4th tab). The site has identified the following sources of information: • Annex 8. Status of water bodies and deadline for achieving objectives: The Appendix 8 shows the status of the water quality of the different water bodies in Catalonia (river, dams, sea) in year 2018 and its different scenarios. • https://aca.gencat.cat/es/laigua/estat-del-medi-hidric/estat-de-les-masses-daigua/ :This link redirects you to the options to view in real time the status of reservoirs and other water bodies, such as rivers (currently under web revision), sea or groundwater. • https://aca.gencat.cat/es/laigua/consulta-de-dades/dades-obertes/visualitzacio-interactiva-dades/ estat-embassaments/ :Status of reservoirs in Catalonia in real time. To see the reservoir that applies to the catchment of the site, select "Sau (Vilanova de Sau) in the first filter. • https://aplicacions.aca.gencat.cat/sdim21/filtre.do :This link redirects you to the options to view in real time the status of the different water bodies and different parameters. • https://aplicacions.aca.gencat.cat/WDMA/novaCerca.do :This link redirects to the qualitative category of status of different water bodies. There are no water-related challenges that would be a threat to good water quality status for people or environment identified.	
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.*	in progress

Comment	The following documents were reviewed: - Annex XI lists all water-related protected areas in Catalonia. - Figure elaborated internally showing all the protected areas in relation to water in the catchment of study: the Ter Llobregat system. Auditor´s comments: The site has identified the IWRA (Important Water-Related Areas) as the protected areas included in Annex XI of the "Catalonia River Basin District Management Plan 2022-2027," which includes the following elements: • Protected areas for water abstraction intended for consumption. • Protected areas for economically significant aquatic species. • Protected areas for recreational use. • Protected areas in relation to nutrient input: vulnerable and sensitive areas. • Vulnerable areas under Directive 91/676/EEC. • Protected areas for habitats or species. • Protected areas in inland and coastal water bodies. • Protected areas for habitats and/or species in inland water bodies according to environmental regulations. • Areas declared under special protection for habitats and/or species within the framework of hydrological planning. • Protected coastal water bodies. • Protected areas and groundwater bodies. • Hydrological reserves. • River natural reserves. • Lacustrine natural reserves. • Underground natural reserves. • Protection perimeters for mineral and thermal waters. • Special protection areas in water bodies. The IWRA map includes the following elements: wetlands, water bodies, and hydrographic network (map: Figure - IWRA in the catchment). ***Finding No: TNR-014540***
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 identified the following elements: • Sau dam: The Sau dam is located on the Ter River, in the northeast of central Catalonia, in the Osona region. The dam is located in the municipality of Vilanova de Sau, as is most of the reservoir. The construction of the Sau intake, with a reservoir capacity of 165 hm3, represents a significant improvement in the regulation system of the Ter River, together with the Susqueda and Pasteral I reservoirs. The main purpose is to supply water to Barcelona and its metropolitan area, supply Girona and towns on the Costa Brava, irrigation of the Ter and hydroelectric use. • Wastewater Treatment Plant (WWTP) of Rubí: The sanitation system, managed by the Catalan Water Agency, consists of a Wastewater Treatment Plant (WWTP) that has a biological treatment of half-load activated sludge. • Ter Wastewater Treatment Plant: The Ter Wastewater Treatment Plant is located in the municipalities of Cardedeu, Llinars and La Roca del Vallès and began operating in 1966. The plant has a treatment capacity of 8 m3/s and can store up to 557,664 m3. • List of Reservoirs in Catalonia. • The distribution network: The ATL distribution network receives water from the Llobregat, Ter and Cardener rivers, and from the desalination plants located at the mouths of the Llobregat and Tordera rivers. The water from the Ter river is collected in the Pasteral reservoir, downstream from the Sau and Susqueda reservoirs. From this collection it reaches the Ter wastewater treatment plant (8 m3/s) located in the municipalities of Llinars del Vallès, Cardedeu and La Roca del Vallès. Water from the Llobregat river is collected at the Llobregat wastewater treatment plant, located in the municipality of Abrera (3.2 m3/s). The water of the Cardener river, from the La Llosa del Cavall reservoir, is treated at the Cardener DWTP (0.35m3/s), located in the municipality of Navès. Once made drinkable, the water is stored in the general tanks of both plants to be distributed, through the network, to the delivery points of the municipalities that are part of ATL's supply. The two desalination plants capture sea water and transform it into drinking water. That of La Tordera (20 Hm3/year) is distributed between the municipalities of the coastal area of the La Selva region with the municipalities of Blanes, Lloret de Mar and Tossa de Mar; the Maresme Norte with the towns of Palafolls, Arenys de Mar, Arenys de Munt, Canet de Mar, Malgrat, Pineda, Sant Cebrià de Vallalta, Sant Iscle, Sant Pol de Mar and Santa Susanna; as well as the Ter water treatment plant. The water from the Llobregat desalination plant (60 Hm3/year) is sent, once drinkable, to the Fontsanta tanks, located in Sant Joan Despí. ATL supplies drinking water directly to 116 municipalities in 9 regions: Alt Penedès, Anoia, Baix Llobregat, Barcelonès, Garraf, Maresme, La Selva, Solsonès, Vallès Oriental and Occidental. The general condition of the aforementioned infrastructure is considered to be good. The site has identified and evaluated the potential exposure to extreme events in the Excel file 1.5. Water related data for the catchment.	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	✓ Yes

Comment	Links with technical information on the DWTP of Ter, distribution stations and distribution network: https://www.atl.cat/es/estacion-distribuidora-de-la-trinitat_3498 https://www.atl.cat/es/estacion-distribuidora-de-fontsanta_3537 https://www.atl.cat/es/estaciones-de-tratamiento-de-agua-potable-etap_2452 https://www.atl.cat/es/la-red-de-distribucion_3776 It has been verified that data on water quality, WASH, distribution networks, wastewater treatment plants, etc., are publicly available to the competent authorities. In addition, the risks of "Unimproved/No Drinking Water" and "Unimproved/No Sanitation" have been assessed according to Aqueduct and the site is classified as low risk for both aspects (see glossary).
1.6	*Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*
1.6.1	*Shared water challenges shall be identified and prioritized from the information gathered.* Obs.

Comment

Although the main water challenge identified in Catalonia is the Water availability (water scarcity), there are other challenges, such as the quality of water supply, the extreme natural events, the water costs or the flooding.

The site has identified the following water challenges (see excel file 1.6._Shared_water_challenges):
• Water availability (water scarcity): The risk of water scarcity can apply in several ways:
- Production disruption: water scarcity can lead to interruptions in the water supply, affecting industrial processes and causing production delays or shutdowns.
- Increased costs: industries may face higher costs for water procurement, treatment, and transportation during water shortages.
- Regulatory compliance: stricter water usage regulations imposed during scarcity may require costly
adjustments to industrial operations.
- Supply chain impact: water scarcity can disrupt the supply chain, affecting the availability of raw
materials or transportation.
- Reputation and sustainability: failure to address water scarcity risks can harm a company's reputation and sustainability goals.
- Infrastructure investment: industrial sites may need to invest in water-efficient technologies or
alternative water sources.
• Quality of water supply: Contamination of the water distribution system (e.g. from pollution in reservoir, or leaky pipework) with a chemical/biotoxin/pathogen/radionuclide to cause deaths, injuries and/or economic damage.
• Extreme natural events: Extreme natural events that could cause damage to water infraestructure
(e.g. earthquake, freezing pipes and breakages due to extreme cold). The vulnerability of the site to extreme natural events is considered low in terms of earthquakes and floodings.
• Water costs: The site does not have a full understanding of all its water costs, i.e. cooling water and
water trucked off-site costs.
In addition, there is a risk of increasing fees for water use and treatment:
- Increased used of costly desalinisation solutions
- Price hikes on water supply
- Restrictions on certain types of water and energy use
• Flooding: According to National Cartography System and Flood Zones (Sistema Nacional de Cartografía y Zonas Inundables - SNCZI) and to the Catalan Institute of Cartography and Geology, which provide information of the flood risk areas, the site is not located in an flood risk area (i.e. the flood risk is exceeding the 500-year return period).
The nearest flood risk area (a 500-year return period flood risk area) is 2.3 km west of the site. Based on this distance, the site location and topography, the site is not considered to be at increased flood risk due to climate change.
The site representatives reported no known occurrences of flooding.

The site has identified the priority and reflected the result of the analysis in the Priority for Site tab:
• Water availability (water scarcity): High.
• Quality of water supply: Low.
• Extreme natural events: Low.
• Water costs: Low.

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

Comment	Interesting and relevant initiatives promoted by the authorities have been identified to address the challenges, except for the challenge related to water costs. The site has identified the following initiatives to address shared water challenges (see excel file 1.6._Shared_water_challenges): • Water availability (water scarcity): Special drought plan (ACA) and Sabadell regenerated water plant. • Quality of water supply: PHDC Measures Plan: Objective 3: “Recovery and improvement of the quality of the river space, its biodiversity and the derived ecosystem services”. • Extreme natural events: PROCICAT: Civil protection plan of Catalonia • Flooding: "Flood Risk Management Plan (PGRI) Civil Protection information for cases of rain and flooding.	
1.7	*Understand the site’s water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*	
1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes

Comment	Numerous risks related to water management have been identified and their criticality for the company has also been assessed (see first tab of the Excel file 1.7. Water risks and opportunities). One aspect has been identified as high risk (Water scarcity / availability due to droughts), and three others as medium risk (Disruption of the Water Supply, Regulatory Risk, and Sustainable Water Balance). The rest have been classified as low risk. The site has identified the Water risks (see excel file 1.7._Water_risk_and_opportunities_matrix), including the following information for each one of them: • Risk • Risk detail applicable to BIESA • Category • Likelihood • Severity for BIESA • Risk Score • Mitigation and response measures / Opportunities The identified risks are: • Water scarcity / availability (Drought) • Disruption of the Water Supply • Regulatory Risk • Sustainable Water Balance • Incident Response • Water Supply Pollution (quality) • Wastewater Discharge (Impact on Ecosystem) • Extreme natural events • Important Water Related Areas (IWRAs) • Water costs • Flooding • Supplier water risk • Population Growth • Social tensions and conflicts • Catchment Governance • Dependence on hydropower • Future water availability • Internal Water Management Program Opportunities • Stakeholder Engagement The analysis (see Excel) assesses the potential costs and business impact in terms of lost production in ranges of 0-25%, 25-75% and more than 75%).	
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	Several opportunities have been identified from the risk analysis. (see second tab) One of them has been classified as a high priority: Plan for the sustainable management of the water cycle. The site has identified the following water opportunities: • Plan for the sustainable management of the water cycle: The Site has the opportunity to develop a long term water management pplan that will provide water resilient operations and a collaboration with important stakeholders to mobilise joint and sustainable solutions in the area. In this context, the site has already a plan for the sustainable management of the water cycle in accordance with the requirement of the Sant Cugat del Vallès municipal ordinance on water savings for large consumers with a consumption of more than 5,000 m3/year. • Legal register: Develop a legal register that meets all legal water requirements to achieve and maintain regulatory compliance (as required by the criteria 2.2. of AWS) and update the legal register on a regularly basis (at least twice a year). • Water balance: To develop in greater detail the water balance of the plant in order to know exactly the possible peaks of water consumption to avoid, possible leaks... This would help to decide on the scale of priority for water efficiency measures to be implemented. • Prevention on water costs: - Increase expected budget for water fees - Invest in water saving equipment (toilets, showers, laundry and pools) - Water saving landscaping (types of gardening) • Supply chain continuity: Evaluate the risk of suppliers, and whether their geographical location is prone to water crisis or disaster. • Best practices: To develop or document the site related best practices for each global best practices.
1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*
1.8.1	*Relevant catchment best practice for water governance shall be identified.*

Yes

Comment	The relevant catchment best practice for water governance identified by the site are the following (see 1.8._Best_practices_AWS): • Designate a plant water stewardship responsible • A comprehensive water stewardship plan that is routinely reviewed and updated. • Water Stewardship program is sponsored by a member of the plant leadership team. • Training of all employees on the principles of water stewardship and how they can incorpórate them within their daily tasks and responsibilities • Understand the key basin stakeholders, has a system in place to monitor water stewardship policies, and engages as appropriate. • Engaging with peer plants and stakeholders to promote water stewardship • Communicating plant's water stewardship commitment to set a leading example to others • Carry out study and calculation of direct water footprint • Implement and mantain an ISO14001 environmental management system and an ISO50001 energy management system. • Provision of a service/platform specialized in environmental legislation for alerting and evaluating compliance with legal requirements and information on best available techniques. • Monitoring: Improve the monitoring and measurement • Establish an internal policy for the efficient use of water, addressed to all the people of BIESA/BIAHE • Communication campaigns for the internal awareness on the use of water. • Suppliers evaluation, with consideration of water saving criteria in the selection of those that are associated with activities with significant water consumption. • Implement and comply with an environmental management system (EMS) • Establish and maintain an inventory of water and waste gas flows, as part of the environmental management system • Use data and innovation to guide water planning The interviews conducted as part of the audit show that the company's staff is aware of the good practices identified and has participated in the corresponding analysis.	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes

Comment	The relevant catchment best practice for water balance identified by the site are the following (see 1.8._Best_practices_AWS): • Site has a qualified water sustainability owner • Site has established and End to End water management team with key technology and consumption owners • Detailed water map exists and is updated annually or with major changes to site water system. • Meters installed at water sources, discharges, and major water user locations. • Site tracks its water costs • A system is in-place to maintain Utility and Process systems at Base Condition • Site annually assesses current best available technologies and reapplication projects for utility and cleaning and sanitization systems • Water-related changes are incorporated into site Change Management program and followed for changes impacting any plant water system. • Sustainability Project Impact Assessments are completed for all major projects • Sustainability Water Project Action Plan is written and updated annually. • Complete a water reuse/recycling assessment and incorporate findings into the masterplan. • Evaluate installation / expansion of Rain Water capture and reuse. • Efficiency measures in the use of water in the production area • Efficiency measures in water facilities • Efficiency measures in the irrigation system of green areas • Harvesting rainwater from the roof of the I&O building • Efficiency measures in the use of water in sanitary facilities (bathrooms, changing rooms) • Study of measures to minimize water consumption in production area • Study of measures to minimize water consumption in the wastewater treatment plant • Study of measures to minimize water consumption by Engineering systems • Study of measures to minimize water consumption in green areas • Study of measures to minimize water consumption in sanitation facilities • Study of measures to minimize water consumption in the kitchen • General actions to minimize water
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* — Yes

Comment	The relevant catchment best practice for water quality identified by the site are the following (see 1.8._Best_practices_AWS): • An appropriate wastewater treatment process in place and maintained • The wastewater treatment process is designed and maintained for spill protection • There is monitoring with a BMS system with daily consumption monitoring for prompt action in the event of possible leaks and daily, monthly and annual analysis to detect improvements. • Effective maintenance plan for water supply facilities • There is refrigeration by refrigeration groups and by means of refrigeration towers, with efficient operational control in terms of preventive maintenance, purge control, control and prevention of legionellosis. Open circuit refrigeration systems are not available. • Carrying out automatic purges using conductivity probes. • Control major process parameters (including continuous monitoring of wastewater flow, pH and temperature) at key locations (e.g. pre-treatment inlet and final treatment inlet) • Control emissions to water in accordance with EN standards, at least with the minimum frequency indicated in the Decision. If EN standards are not available, BAT is to apply ISO standards or other national or international standards that ensure data of equivalent scientific quality are obtained. • Separate uncontaminated wastewater streams from wastewater streams that require treatment. • Provide adequate buffer storage capacity for wastewater generated under conditions other than normal operating conditions, based on a risk assessment (taking into account, for example, the type of pollutant, effects on subsequent treatment and on receiving environment) and take other appropriate measures (e.g. control, treatment, reuse). • Use an integrated wastewater management and treatment strategy that includes an appropriate combination of the following techniques: • Pre-treat wastewater that contains contaminants that cannot be adequately removed during final wastewater treatment by appropriate techniques. • Use an appropriate combination of the following final wastewater treatment techniques. • APIs reduction Add all the work that we are already doing for analytical measurements for the APIs and reflects BI's Clean Water Index on the site. The interviews conducted as part of the audit show that the company's staff is aware of the good practices identified and has participated in the corresponding analysis.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes

Comment	The relevant catchment best practices for site maintenance of Important Water-Related Areas identified by the site are the following (see 1.8._Best_practices_AWS): Selection of Mediterranean Native Species In addition to these, succulent plants, typically originating from areas with low rainfall, are also selected. The selection of species prioritizes traits that maximize water efficiency, such as an abundance of evergreen shrub species and annual plants; reduced leaves, the presence of scales, and, in extreme cases, features like spines, water-storage organs, the absence or transformation of leaves, etc. Create and Maintain Green Areas on the Site Maintain a sufficient percentage of green areas on the site (at least 10% of the total site area). Additionally, provide a site map illustrating all green areas and keep a record of plant species. Activity in the Llobregat Riverbed A garbage collection activity in the Llobregat Riverbed conducted by employees in collaboration with SEO Birdlife. The interviews conducted as part of the audit show that the company's staff is aware of the good practices identified and has participated in the corresponding analysis.
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* — Yes
Comment	The relevant catchment best practices for site provision of equitable and adequate WASH services identified by the site are the following (see 1.8._Best_practices_AWS): • Annually, the WASH survey should be completed, and outages addressed. • Sanitation facilities in each building. • Hand washing and sanitation spots. • PPE (Personal Protection Equipment) plan, stations and instructions • Regular employee trainings on WASH issues. • WASH contact points at site level. • Effective preventive and corrective maintenance plan for water supply facilities. The interviews conducted as part of the audit show that the company's staff is aware of the good practices identified and has participated in the corresponding analysis.

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 COMMITMENT LETTER signed by Daniel Marquardt (Site Head) was reviewed: "Boehringer Ingelheim España, S.A. commits to supporting the pursuit of responsible water stewardship within the Corporate MORE GREEN initiative. As head of the site I will support the local site's efforts to achieve the outcomes of water stewardship, namely good water governance, good water balance, good water quality and healthy important water-related areas when relevant. In the context of implementing the AWS Standard, I am committing that: • We will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes. • The implementation of the AWS Standard on our site will be aligned to and in support of existing catchment sustainability plans. • The site's stakeholders will be engaged in an open and transparent way. • We will allocate appropriate resources to implement the AWS Standard and ensure that there is sufficient organizational capacity to continually improve and adapt its water stewardship actions and plans."	
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	A permanent subscription is maintained with an external legislative update service that, through a platform, determines how the legal requirements that affect the organization apply regardless of the scope of the issuing Administration (local, regional, state or European). The platform provides access to all legal requirements applicable to the organization and includes a consulting service in the application itself. In addition, communications are received with legislative changes and bimonthly summaries of the changes and their impact. All personnel who are an interested party in these new legal requirements and other requirements have access to the platform and relevant communications. The description of the legal compliance system (see Word file: "Sistema de cumplimiento legal.docx") and the audit report for verification of legal compliance (see Word file: "Auditoría cumplimiento legal 2023.docx") were reviewed. The Manual EHS (reviewed by the auditor) includes the following information: • Identification of responsible persons/positions within facility organizational structure. • Process for submissions to regulatory agencies.	

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

This requirements are met in Water Stewardship Strategy, including:

Mission
The site of Boehringer Ingelheim in Sant Cugat works to ensure the water security in its operations as well as a responsible management of the water resource in the catchment. The objective is to mitigate the impacts of its operation, by controling water consumption and keeping water clean, and strength the parnterships with the public sector and other stakeholders to promote a responsible water stewardhship.

Vision
Boehringer Ingelheim aims to position its site in Sant Cugat as a responsible water steward among the pharma industry in Spain, by working to ensure the quality and the quantity of the resource in the catchment, as well as by working together with private and public stakeholders to address the local water challenges.

Goals
Boehringer Ingelheim, in its commitment with the responsible management of the water resource and to respond the local water challenges, has defined three areas of action to prioritise the efforts of its water stewardship strategy:
- Water stewardship: Ensure responsible water management on-site and in the value chain, as well as collaborate with stakeholders to promote good water practices and sustainable solutions in the catchment of operation.
- Reduce water consumption by implementing water saving and water efficiency measures.
- Clean water: Reduce the concentration of Active Pharmaceutical Ingredients in its wastewater discharge.

Specific targets
1. Reduce at least 15% the site's overall water consumption by 2030 (vs. 2019)
2. Further improve water monitoring on-site and track water efficiency.
3. Ensure that APIs in the site's wastewater discharge are below effect level by 2030.
4. Establish an internal continous process for collaboration with the catchment's water stakeholders and promotion of water stewardship.
5. Implement awareness actions for water stewardship.

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.

No

Comment

An Action Plan has been developed to implement initiatives to guide the achievement of the AWS
Strategy's objectives.
It can be seen in the different columns that all the initiatives have been assigned a person in charge, a
timeframes and the resources needed.
The Action Plan is reviewed (see Excel file 2024_10_AWS_Action_Plan_BIESA), and it is verified that it
includes the following information:

- ID
- AWS Objective
- Actions
- Description / Comments
- AWS Outcome
- Reference
- Business Unit
- Responsible
- Status
- Start
- End
- Measure / Evidence of the Outcome
- AWS Criteria
- Performance Evaluation (4.1.1)
- Value Creation (4.1.2)
- Shared Benefits in the Catchment (4.1.3)
- Changes (4.4)

Finding No: TNR-016032

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 Mitigation or Adaptation Plan is reviewed (see Excel file 2.4_Adaptation_and_mitigation_plan), and it is verified that it includes the following information:

- Mitigation / Adaptation Measure
- Risk mitigated
- Related stakeholder / external agency

For example, for the mitigation / Adaptation Measure: "Development and regular updating of the
"Sustainable management of the water cycle" in accordance with the requirement of the Sant Cugat del Vallès municipal ordinance on water savings for large consumers with a consumption of more than 5,000 m3/year.", the Risk mitigated is "Water scarcity / availability (Drought)" and the Related
stakeholder / external agency is Sant Cugat del Vallès City Council.

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	Several communication actions (external and internal) in order to promote good water stewardship within the catchment have been conducted. In addition, the site has closely followed up on the potential installation of a reclaimed water plant in Sabadell (follow-up emails are available as evidence in indicator 3.8). Evidence of the site's participation in various outreach events related to good catchment governance is reviewed: • ENVIRONMENTAL FOOTPRINT (VISIONARIES CONFERENCE: Innovation and Future in Respiratory Diseases). Presented in 2023 by Mónica Sánchez (Head of Environment, Health & Safety). • SUSTAINABILITY IN THE PHARMACEUTICAL INDUSTRY (ISPE). Presented in 2024 by Mónica Sánchez (Head of Environment, Health & Safety). • Internal communication within the company: STATE OF EMERGENCY declared due to DROUGHT in the Ter-Llobregat system. Tips are provided to employees for water conservation.	
3.1.2	*Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*	Yes
Comment	The site consumes water provided by a third party (official supplier) and the water use does not involve other people's water rights. The site has respected the limitations on water use when the regional administration has established limitations on consumption, reducing industrial water consumption by 25%.	
3.2	*Implement system to comply with water-related legal and regulatory requirements and respect water rights.*	
3.2.1	*A process to verify full legal and regulatory compliance shall be implemented.*	Yes

Comment

The EHS system has a planning for legal compliance (see section 5.3. of the EHS Manual) and the
department also has tools to alert them of communications to be made (register and calendar).
The document BIE-EHS-Healthy Company, Occupational Health and Safety, Environment, Road Safety
and Energy Efficiency Integrated Manual (BI-VQD-80491-N EHS Manual) is reviewed, which establishes the legal and regulatory control system in the following sections:
5.3. LEADERSHIP OF THE EHS SYSTEM
5.3.1. Management Commitment
5.3.2. Organigram
5.3.3. Roles and responsibilities
5.4. EHS SYSTEM PLANNING
The following evidence is reviewed:
- Environmental control audit report (done by Dekra).
- Analyses of the Catalan Water Agency
- Basic Declaration of Water Use and Pollution (every 4 years).
- Quarterly declaration of volumes of water consumed.
- Sustainable water cycle plan (every 4 years).
No legal violations ocurred in the last years. The satekeholders interviewed in the audit claimed they wer not aware of any legal violation.

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 site receives water through an official supplier and there is no impact on the water rights of others in the use of water or in the company's activities. The site has respected the limitations on water use when the regional administration has established limitations on consumption, reducing industrial water consumption by 25%.

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

All actions related to water use efficiency (or reduction of water consumption) are tracked and the volume reduced per action is calculated.
In addition, water consumption is tracked in the water consumption excel (see 1.3.3. Water consumption) or in the water balance (see 1.3.2. Water balance).

The water balance as of the audit date (November 2024) is as follows:

Water Input: 28,976 m³.
Water Output: 29,100 m³.
Water Balance (Input - Output): A deficit of -124 m³.
Percentage Deviation Relative to Total Input: -0.43%.

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 first target of the AWS Strategy is:
"1. Reduce at least 15% the site's overall water consumption by 2030 (vs. 2019)"
Up to 14 initiatives related to this objective are currently under study or under implementation. See
AWS Action Plan Excel.
Evidence is available on the progress of all actions (both implemented and in progress). Available for
review in the site archive.
The actions implemented for "1. Reduce water consumption by 15% by 2030 (vs. 2019)" identified in
the AWS Action Plan are as follows:
Project for recovering water discarded during the cooling of WFI water, which comes in at 80ºC and is
cooled to 25ºC, to be used in production washing or utilities.
Study the use of company network water for cleaning rooms that is currently purified.
Conduct a study on the application of Best Available Techniques (BATs) related to water-saving
technologies in production processes during the design phase of aseptic processes.
Review kitchen practices to minimize water consumption by the company managing the canteen. For
example, reviewing water consumption in displays used to keep food warm.
Use of rainwater from the ECO roof.
Study the possibility of recovering water from the 3rd and 4th washes of manufacturing processes for
reuse in cleaning, or alternatively, sending it to the irrigation tank, ensuring no contamination of
irrigation water with APIs.
Study of greywater recovery and use.
Install 100% flow-limited showers (< 6 l/min).
Review the cleaning of production equipment: Review validated cleaning methods to optimize water
use in the process. Review cleaning validations in production with water-saving criteria.
Expansion of dry garden areas.

3.3.3 *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*

Yes

Comment

The site has respected the limitations on water use when the regional administration has established limitations on consumption, reducing industrial water consumption by 25%. The pharmaceutical company has an official water supplier and does not have the obligation or need to reallocate water to social, cultural, or environmental needs, for the following reasons:
• Controlled water use: The site receives water from an official supplier that manages its distribution
and supply in accordance with local regulations. This means the company does not have direct control over the allocation or reallocation of water resources, as the supplier already fulfills legal and social obligations.
• Lack of direct responsibility: Since the site does not extract water from natural sources or manage
its distribution, it is not in a position to reallocate water to social, cultural, or environmental needs. The management and regulation of water fall to the official supplier, which ensures its appropriate use according to local regulations.
• Absence of legal obligations: The site is not legally obligated to reallocate water for other purposes,
as its operations and consumption are within the terms established by the contract with the official
supplier. This means it has no direct obligation to modify the use or distribution of water to meet these purposes.

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

Since the main element of water quality control is the Active Pharmaceutical Ingredient (APIs), all water quality initiatives of the AWS Action Plan are related to this element. The Clean Water corporate
certificate is attached, as well as evidence of participation in an information day on APIs.

In addition, as shown in indicator 1.3.4. there are:
- A legionella prevention control involving regular analytics of incoming water.
- A quality controls program for the discharges.

The AWS Objective related to water quality is as follows:
3. Ensure that APIs in the site's wastewater discharge are below effect levels by 2030.
The planned actions include conducting the corporate "PIE-Side assessment" every 3 years to achieve
100% of the Clean Water Index: all values (PECs and MECs) below effect level (PNEC).
The following documents have been reviewed:
PEC/PNEC A SSESSMENT (date: August 2023), including:
• 01 List of APIs
• 02 List of available PNECs
• 03 Waste effluent flowchart
• 04 PEC theoretical calculation
• 05 MEC actual measurements
• 06 Final statement per compound incl. PEC/PNEC or MEC/PNEC ratio
• 07 Project status
• 08 Action plan
Certificate of Clean Water Index. Result: Clean Water Index (December 2023): 100 %
Conference on Pharmaceutical industry and environment. Aspects related to water. Date: April 2024.

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	It is not a water challenge classified as high priority, however, several actions are conducted at the site, and participation on external events is recurrent. The Good Practices regarding water quality are the following: • An appropriate wastewater treatment process in place and maintained • The wastewater treatment process is designed and maintained for spill protection • There is monitoring with a BMS system with daily consumption monitoring for prompt action in the event of possible leaks and daily, monthly and annual analysis to detect improvements. • Effective maintenance plan for water supply facilities • There is refrigeration by refrigeration groups and by means of refrigeration towers, with efficient operational control in terms of preventive maintenance, purge control, control and prevention of legionellosis. Open circuit refrigeration systems are not available. • Carrying out automatic purges using conductivity probes. • Control major process parameters (including continuous monitoring of wastewater flow, pH and temperature) at key locations (e.g. pre-treatment inlet and final treatment inlet) • Control emissions to water in accordance with EN standards, at least with the minimum frequency indicated in the Decision. If EN standards are not available, BAT is to apply ISO standards or other national or international standards that ensure data of equivalent scientific quality are obtained. • Separate uncontaminated wastewater streams from wastewater streams that require treatment. • Provide adequate buffer storage capacity for wastewater generated under conditions other than normal operating conditions, based on a risk assessment (taking into account, for example, the type of pollutant, effects on subsequent treatment and on receiving environment) and take other appropriate,measures (e.g. control, treatment, reuse). • Use an integrated wastewater management and treatment strategy that includes an appropriate combination of the following techniques: • Pre-treat wastewater that contains contaminants that cannot be adequately removed during final wastewater treatment by appropriate techniques. • Use an appropriate combination of the following final wastewater treatment techniques. • APIs reduction Add all the work that we are already doing for analytical measurements for the APIs and reflects BI's Clean Water Index on the site.
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

One action has been identified in this regard:
In july 2023, Nearly 200 of the company's employees have actively participated in corporate volunteering activities for three weeks as a sign of the company's commitment to sustainability.
These initiatives are part of an internal meeting that the pharmaceutical company organizes annually to reflect among all its employees on the company's internal culture and values.
The employees have visited the Red Cross humanitarian and emergency center in Sant Martí de Tous, collaborating in the classification of products received, and in the collection, accounting and delivery of essential products with the Spanish Federation of Food Banks (FESBAL).
Also, 284 kg of waste have been collected along the banks of the Llobregat River through cleaning campaigns with the SEO Birdlife organization.
Committed to people's well-being and health, more than 150 Boehringer Ingelheim Spain employees have participated in volunteering actions for three weeks, with the help of the Red Cross humanitarian and emergency centre in Sant Martí de Tous (Barcelona), SEO Birdlife, Fundació Assis and the Spanish Federation of Food Banks (FESBAL). In line with the company's efforts to conserve natural spaces and preserve their biodiversity, clean-up drives have been organised on the banks of the Llobregat river through which, together with SEO Birdlife, employees have managed to collect 284 kg of waste, and they have done so with the help of homeless people from Fundació Assis.

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 contract with the municipal water network (Sorea) and the certificate of potability from the bottled water supplier (Aquaservice) were reviewd by the auditor (see attached file).
The provided documentation verifies that access to safe drinking water, effective sanitation, and
protective hygiene (WASH) is guaranteed for all workers onsite. During the main audit, facilities related to WASH were thoroughly reviewed to ensure legal compliance (including local regulations) and adequacy.
The auditor's site visit also verified that access to drinking water and WASH-related facilities (showers, sinks, toilets, etc.) were adequate.

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 company has an official water supplier and does not affect the human right to safe water and sanitation of communities through their operations,, for the following reasons: Controlled water use: The pharmaceutical company receives water from an official supplier that manages its distribution and supply in accordance with local regulations. This means the company does not have direct control over the allocation or reallocation of water resources, as the supplier already fulfills legal and social obligations. Lack of direct responsibility: Since the company does not extract water from natural sources or manage its distribution, it is not in a position to reallocate water to social, cultural, or environmental needs. The management and regulation of water fall to the official supplier, which ensures its appropriate use according to local regulations. Absence of legal obligations: The company is not legally obligated to reallocate water for other purposes, as its operations and consumption are within the terms established by the contract with the official supplier. This means it has no direct obligation to modify the use or distribution of water to meet these purposes. The site has developed water-related incident response plans (see 1.3.1): - Procedure in case of soil Contamination (1_135-02-BIE-0237 Cont suelos) - Wastewater Treatment Plan Procedure (1_135-03-BIE-0249 PAR) - Shutter system Procedure (1_135-03-BIE-0325 Obturador) - Contingency Plan (Plan de contingencia del suministro de agua (BI-VQD-66010-N) The site receives water through an official supplier and there is no impact on the water rights of others in the use of water or in the company's activities. The site has respected the limitations on water use when the regional administration has established limitations on consumption, reducing industrial water consumption by 25%.	
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	Actions related with the indirect water use are: - Update the water stress risk analysis of suppliers and raw materials (annually). - Evaluation of suppliers, considering water saving criteria in the selection of those associated with activities with significant water consumption. The evaluation and water stress risk analysis of suppliers and raw materials was checked by the auditor.	
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	An EHS questionnaire is carried out for all suppliers asking whether they implement water efficiency actions. The excel file with the results of all questionnaires was checked by the auditor.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes

Comment	In addition to numerous water-related communications with local authorities (City Council, regional administration, Catalan Water Agency), the regenerated water project to be installed in Sabadell has been closely monitored. Evidence of this monitoring was checked by the auditor.. Evidences of the participation of the company in the Workshop on best practices in water management and the use of reclaimed water (date: February 2024) were reviewed in the audit. The OFFER FOR THE SERVICE OF TRANSPORT, SUPPLY, AND TRANSFER OF RECLAIMED MUNICIPAL WATER TO BOEHRINGER INGELHEIM (SANT CUGAT) from the Comunidad de Propietarios Centro Comercial Glorias (email and offer) was also reviewed.	
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	Several communication actions (external and internal) in order to promote good water stewardship within the catchment have been conducted. In addition, the site has closely followed up on the potential installation of a reclaimed water plant in Sabadell (follow-up emails are available as evidence in indicator 3.8). Evidence of the site's participation in various outreach events related to good catchment governance is reviewed: • ENVIRONMENTAL FOOTPRINT (VISIONARIES CONFERENCE: Innovation and Future in Respiratory Diseases). Presented in 2023 by Mónica Sánchez (Head of Environment, Health & Safety). • SUSTAINABILITY IN THE PHARMACEUTICAL INDUSTRY (ISPE). Presented in 2024 by Mónica Sánchez (Head of Environment, Health & Safety). • Internal communication within the company: STATE OF EMERGENCY declared due to DROUGHT in the Ter-Llobregat system. Tips are provided to employees for water conservation. The appointment of Monica Garcia as water manager at the site is verified: https://www.boehringer-ingelheim.com/es/sobre-nosotros/etica-y-responsabilidad/monica-sanchez	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes

Comment

Best practices related to Water Balance were identified, as requested in step 1 (1.8) and the implementation has been evaluated in the excel file, see tab "Best Practices".
Various actions were planned and implemented;
Site has a qualified water sustainability owner
Site has established and End to End water management team with key technology and consumption owners
Detailed water map exists and is updated annually or with major changes to site water system.
Meters installed at water sources, discharges, and major water user locations.
Site tracks its water costs
A system is in-place to maintain Utility and Process systems at Base Condition
Site annually assesses current best available technologies and reapplication projects for utility and cleaning and sanitization systems
Water-related changes are incorporated into site Change Management program and followed for changes impacting any plant water system.
Sustainability Project Impact Assessments are completed for all major projects
Sustainability Water Project Action Plan is written and updated annually.
Complete a water reuse/recycling assessment and incorporate findings into the masterplan.
A appropriate wastewater treatment process in place and maintained
The wastewater treatment process is designed and maintained for spill protection
There is monitoring with a BMS system with daily consumption monitoring for prompt action in the event of possible leaks and daily, monthly and annual analysis to detect improvements.
General actions to minimize water

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

Yes

Comment

Best practices related to Water Quality were identified, as requested in step 1 (1.8) and the implementation has been evaluated in the excel file, see tab "Best Practices".Various actions are planned:
A appropriate wastewater treatment process in place and maintained
The wastewater treatment process is designed and maintained for spill protection
There is monitoring with a BMS system with daily consumption monitoring for prompt action in the event of possible leaks and daily, monthly and annual analysis to detect improvements.
ERvidences were checked by the auditor.

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 action has been identified in this regard:
In july 2023, Nearly 200 of the company's employees have actively participated in corporate volunteering activities for three weeks as a sign of the company's commitment to sustainability.
These initiatives are part of an internal meeting that the pharmaceutical company organizes annually to reflect among all its employees on the company's internal culture and values.
The employees have visited the Red Cross humanitarian and emergency center in Sant Martí de Tous, collaborating in the classification of products received, and in the collection, accounting and delivery of essential products with the Spanish Federation of Food Banks (FESBAL).
Also, 284 kg of waste have been collected along the banks of the Llobregat River through cleaning campaigns with the SEO Birdlife organization.
Committed to people's well-being and health, more than 150 Boehringer Ingelheim Spain employees have participated in volunteering actions for three weeks, with the help of the Red Cross humanitarian and emergency centre in Sant Martí de Tous (Barcelona), SEO Birdlife, Fundació Assis and the Spanish Federation of Food Banks (FESBAL). In line with the company's efforts to conserve natural spaces and preserve their biodiversity, clean-up drives have been organised on the banks of the Llobregat river through which, together with SEO Birdlife, employees have managed to collect 284 kg of waste, and they have done so with the help of homeless people from Fundació Assis.

3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Best practices related to WASH were identified, as requested in step 1 (1.8) and the implementation has been evaluated in the excel file, see tab "Best Practices". The implementation of an ISO environmental management system (ISO 14001) is reviewed as evidence. See Excel files.	

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: The Performance Evaluation for each initiative is made in the "AWS Action Plan" excel file. See column "Performance evaluation (4.1.1)".
For each AWS objective and action, the site has identified the following elements in the AWS Action
Plan (4.1 2024_10_AWS_Action_Plan_BIESA):
• Start date
• End date
• Measurement/Evidence of Outcome
• AWS criteria
• Performance evaluation (4.1.1): detailing the extent to which the objectives are being met.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* ✓ Yes

Comment: The Value creation for each initiative is made in the "AWS Action Plan" excel file. See column U "Value
creation (4.1.2)".
For each AWS objective and action, the site has identified the following elements in the Water Action
Plan (4.1 2024_10_AWS_Action_Plan_BIESA):
• Start date
Value creation is considered in terms of savings in € or in qualitative terms (reduction of water stress in the basin, increase in the site's knowledge of water use,...).
• End date
• Measurement/Evidence of Outcome
• AWS criteria
• Value creation (4.1.2): assessing the value generated from the sustainable water management
plan.

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

Comment: The evaluation of the Shared benefits in the Catchment for each initiative is made in the "AWS Action Plan" excel file. See column V "Shared benefits in the Catchment (4.1.3)".
For each AWS objective and action, the site has identified the following elements in the Water Action
Plan (4.1 2024_10_AWS_Action_Plan_BIESA):
• Start date
• End date
• Measurement/Evidence of Outcome
• AWS criteria
• Shared benefits in the catchment (4.1.3): identifying the shared value benefits within the catchment area.

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 root cause analysis of the only water-related emergency in 2024 is presented. The incident occurred in April and was due to a very heavy rainfall event that caused flooding in a specific area of the site.
The incident has been assessed according to the site's established template and methodology for all
types of emergencies, which includes a root cause analysis and identification of corrective actions.
The investigation of the sole incident that occurred in 2024, specifically on 29/04/2024, was reviewed.
The incident involved the following:
"On the afternoon of April 29, 2024, an intense, localized rainfall event occurred. Water seeped through
pillars and specific roof slab points down to the 2nd floor of the I&O building, affecting the technical
area and several production zones. Three events were opened detailing the affected areas and systems:
• PR#1971406: AHU57 malfunction due to rain episode.
• PR#1972041: Water leakage in production area due to rain episode.
• PR#1973880: Overpressure alarms in the dispensing area (Injectables and Orals).
The affected production areas were Capsules (Fette S05 room), Central Weighing Area (M09 dressing
room), and Tablets. There were no impacts on the safety of personnel or equipment. Additionally, the
pump room and PCI room located in the basement of the building also experienced water infiltration."
The results of the investigation and the corrective actions taken by the site are detailed below:
• Root Cause: Water accumulation on the roof of the pump room, the roof of FFI&O, and the PAR
area, resulting in minor water infiltration.
• Corrective Actions: Unclogging of rainwater drains.
• Preventive Measures: Deadline: 30-05-2024.
o Review of the maintenance plan for drainage systems, with improved descriptions of tasks and
frequency.
o Awareness-raising through training/information for maintenance personnel on the importance of
these tasks.
o Identification of drains to allow for a more effective response if needed.
o Updating the emergency call protocol and contact numbers, as well as notifying the Emergency
Director for informational purposes.

The changes in the maintenance manual were checked (date: November 2024):
“REV.MAINTENANCE OF ROOFS 4M
General overhaul of roofs of Site and auxiliary buildings
10[ ]Visual inspection general condition of roof finishes
20[ ]Perimeter cleaning by patching.
In case of filter slab, lift slabs.
30[ ]Removal of any rooted plants, cleaning up the area.
40[ ]Collection of leaves, plastics or debris blown in by the wind which can cause
that can cause blockages in the downpipes.
50[ ]Cleaning of drains, gutters and downpipes.
60[ ]Checking of joints between PVC or asphalt sheeting.
70[ ]Checking of crowning plates and fixings.
80[ ]Technical volumes
90[ ]Canopies
100[ ]Boiler room
110[ ]Vertical cores
120[ ]Stores
130[ ]Others:

Request PTE in Height for anchoring to life line
Request PTE at height for the use of a lifting platform.

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

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

Comment The direct communications with the key stakeholders are followed at the Stakeholder Analysis Matrix.
See the excel file in indicator 1.2.1.
The he Stakeholder Analysis Matrix. was reviewed (see 1.2). The following documents were checked by the auditor regarding stakeholder´s involvement:
1. 2024_02_16_Jornada Buenas Prácticas Gestión Agua_BI v3 and Llistat dinscripcions: Power Point
presentation of the conference on Good Practices in the use of water dated 02/16/2024 and list of
attendants.
2. AWS Bimonthly Status Report - October 2024, including the following information:
• Last Key Accomplishments.
• Upcoming Milestones (according to actual timeline)
• Issues, Risks and Dependences
3. Charter for stakeholder participation in the framework of the implementation of the sustainable
water management standard - Alliance for Water Stewardship.
4. Sustainable Water Management Plan – Communication to stakeholders.
The main audit will evaluate, through stakeholder interviews, the degree of involvement and projects
developed jointly with stakeholders.

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 changes and adaptations of wach initiative of the AWS action plan is made in the excel file. See
column W "Changes (4.4.)".
For each AWS objective and action, the site has identified the following elements in the Water Action
Plan (4.1 2024_10_AWS_Action_Plan_BIESA):
• Start date
• End date
• Measurement/Evidence of Outcome
• AWS criteria
• Changes (4.4.)
The detected changes are used to modify the AWS Action Plan if necessary.
The Water Use Efficiency Plan (see attached Excel) was reviewed by the auditor.

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	On the site's website there is a specific section where the water manager (including compliance with laws and regulations) is presented: https://www.boehringer-ingelheim.com/es/sobre-nosotros/etica-y-responsabilidad/monica-sanchez Communications on the water internal governance has been done through the following ways: - Stakeholders engagement letters, where there are the signatures of the EHS Manager (Monica Sanchez) and the Plant Manager (Mercedes Morell) - Events, such as the roundtable celebrated in February 2024, where the Site Managaer and the EHS Manager presented their roles. - In the authorities' inspection reports, where David Corbella appears as the Environmental Technician responsible of the water issues. - In the AWS related articles disclosed in the website: https://www.boehringer-ingelheim.com/about-us/sustainable-development/more-green/every-drop-counts-water-stewardship-boehringer The Stakeholder Excel included in indicator 1.2 details contacts with stakeholders, mainly e-mail communications. In the stakeholder interview it was verified that these communications have been received and that a collaborative relationship is maintained with the two stakeholders interviewed (AGC and "San Cugat empresarial").
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	Attached is the communication letter of the AWS strategy in Spanish and Catalan, as well as the mails sent to key stakeholders. In addition, several communications have been made in events (see engagement activities highlited in 1.2.) and in the website: https://www.boehringer-ingelheim.com/about-us/sustainable-development/more-green/every-drop-counts-water-stewardship-boehringer https://www.boehringer-ingelheim.com/es/gestion-sostenible-del-agua The communication with stakeholders regarding the Sustainable Water Management Plan has been verified through the document Water Management Plan_Stakeholder Communication_BI Format_ESP (v1). Key points include: • Water Efficiency: Diverse strategies to reduce water consumption, including advanced technologies and optimized processes, achieved a 16% reduction in 2023 (compared to a three-year average) and an 8% reduction in early 2024. • Water Monitoring and Control: Enhanced water control systems, including updated water balances and additional metering across the infrastructure, support detailed tracking and identification of improvement areas. • API Discharge Limits: Consistent efforts ensure that active pharmaceutical ingredients (APIs) in wastewater remain below effect levels, validated by achieving a 100% Clean Water Index. • Stakeholder Collaboration: Two events promoting sustainable water management were held in 2024, engaging over 90 companies from public and private sectors. • Awareness and Education: Awareness campaigns and ongoing training sessions were conducted, especially in light of the 2024 drought in Catalonia, to educate employees and visitors on water conservation. In the stakeholder interview it was verified that these communications have been received and that a collaborative relationship is maintained with the two stakeholders interviewed (AGC and “San Cugat empresarial”).	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site’s annual water stewardship performance and results against the site’s targets.*	
5.3.1	*A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	Yes

Comment	The water stewardship performance has been disclosed through the following actions: - Annual sustainability report (EINF 2023). Although no reference to the implementation of the AWS standard has been included this year, progress on the water strategy set out in 2024 and on the implementation of the AWS standard will be included in the sustainability report in the coming years. - In addition, in order to keep key stakeholders informed, a direct letter has been sent by email informing them about the most relevant developments of the strategy. - Finally, a Linkedin communication on the objectives and performance on water issues by BI Sant Cugat is planned for the coming weeks. It has been checked by the auditor that, on October 15, 2024, a communication has been sent to stakeholders regarding compliance with the AWS objectives: 1. Increase water use efficiency. Various strategies have been implemented to reduce water consumption in all operations. This includes the adoption of advanced technologies, process optimization and the implementation of water saving initiatives, contributing to the conservation of this vital natural resource. In fact, at our Sant Cugat del Vallès headquarters, water consumption has been reduced by 16% in 2023 compared to the average of the previous three years and, during the first half of 2024, a reduction of 8% has been recorded compared to the previous three years. 2. Improve water control on site and monitor water efficiency. Water control systems are being improved, including increased deployment of meters and analysis and digitalization tools to accurately monitor water use (water balance) and identify areas for improvement. The water balance has been updated and enhanced with new data sources. In addition, the number of meters installed throughout our infrastructure has been increased. 3. Ensure that APIs in the plant's wastewater discharges are below the effect level by 2030. We are committed to maintaining the highest levels of water quality. We are currently ensuring that active pharmaceutical ingredients (APIs) present in wastewater discharges from our facilities are below the effect level, as demonstrated by obtaining the corporate Clean Water Index of 100%. 4. Establish an ongoing internal process of collaboration with stakeholders in the river basin to promote sustainable water management. So far this year, two events dedicated to "Sustainable Water Management" have been organized at the Sant Cugat headquarters. The first was held on February 16, 2024, with the participation of more than 60 companies, including public companies supplying and managing water infrastructure. The second event was held on May 30, 2024, with the participation of more than 30 companies more focused on the private sector. 5. Implement awareness-raising actions for water management. Given the situation experienced in Catalonia related to water scarcity and drought during 2024, an awareness campaign has been carried out that has been projected on all the screens of our site with the aim of informing about this situation and raising awareness among both BI workers and visitors who access our site. In addition, the on-boarding processes and biennial training sessions that include awareness-raising content on water use are maintained. In the stakeholder interview it was verified that these communications have been received and that a collaborative relationship is maintained with the two stakeholders interviewed (AGC and "San Cugat empresarial").	
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*	
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	✓ Yes

Comment

The shared water-related challenges and efforts made to address these challenges have been disclosed in different ways:
- Stakeholder engagement letter, where the main water challenges of the catchment were identified.
- Presentation on the roundtable (with presence of the public and the private sectors), where the water stress in Catalonia was presented.

In the stakeholder interview it was verified that these communications have been received and that a collaborative relationship is maintained with the two stakeholders interviewed (AGC and "San Cugat empresarial").

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

Yes

Comment

The sending of three communications in relation to sustainable water management to the stakeholders identified as Public Administration was verified:
- Catalan Water Agency
- Sant Cugat City Council
- Ter-Llobregat Water Supply Company

As reported in the previous indicators, there has been a continous and proactive engagement with public sector agencies. These can be checked through:
- The three letters sent to the key stakeholders, which include the public sector (Municipality, Catalan Water Agency and the Municipal Water Supply company)
- The celebration of the Roundtable in February 2024 with presence and participation of the public sector (they had time to present their water related initiatives).
- Several meetings with the Sant Cugat municipality.
- The monitoring of the regenerated water plant project with the authorities (see indicator 3.8)
- Finally, all the mandatory communications with the authorities (such as the random controls conducted by the Catalan Water Agency or the remittance of the water charge).

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

The EHS system has a planning for legal compliance (see section 5.3. of the EHS Manual) and the
department also has tools to alert them of communications to be made (register and calendar).
The document BIE-EHS-Healthy Company, Occupational Health and Safety, Environment, Road Safety
and Energy Efficiency Integrated Manual (BI-VQD-80491-N EHS Manual) is reviewed, which establishes the legal and regulatory control system in the following sections:
5.3. LEADERSHIP OF THE EHS SYSTEM
5.3.1. Management Commitment
5.3.2. Organigram
5.3.3. Roles and responsibilities
5.4. EHS SYSTEM PLANNING
The following evidence is reviewed:
- Environmental control audit report (done by Drekra).
- Analyses of the Catalan Water Agency
- Basic Declaration of Water Use and Pollution (every 4 years).
- Quarterly declaration of volumes of water consumed.
- Sustainable water cycle plan (every 4 years).
No water-related compliance violations occurred in the last years. The stakeholders interviewed in the audit claimed they were not aware of any legal violation.

5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	No water-related compliance violations occurred in the last years (see 5.5.1). The stakeholders interviewed in the audit claimed they were not aware of any legal violation.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	No water-related compliance violations occurred in the last years (see 5.5.1). The stakeholders interviewed in the audit claimed they were not aware of any legal violation.	

Photographic Evidence from Audit

Yes

Comment: The photos have not been presented for confidentiaity reasons.

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
Comment	Main audit (not applicable).	