CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001338

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Haleon Italy Manufacturing S.r.l.**
Address: via Nettunense, 90, 04011, Aprilia, ITALY
Contact Person: Mattia Casale
AWS Reference Number: AWS-000698
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Apr-30
Validity of certificate: 2028-Apr-29

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Nov-26
Audit End Date: 2024-Nov-28
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Freschi, Lead Auditor

Site Participants:
Aseer Akther, Factory Director
Maria Cristina Di Mascio, Factory EHS Manager
Mattia Casale, EHS Engineer
Barbara Rossi, EHS Engineer
Giorgia Bonanotte, EHS Engineer
Chiara Bonanni, EHS Engineer
Michela Russo, EHS Engineer
Simone Natalizia, EHS Engineer
Guglielmo Davide, EHS Engineer
Marco Minotti, Engineering Manager
Giuseppe Campolo, Utilities Manager
Fabio Quattrocchi, Energy Manager
Anastasia De Castro, Quality manager
Daniel Rutsa, Corporate Sustainability

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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Nov-27	09:00:00 - 18:00:00	09:00	Carlo Enrico Freschi	
2024-Nov-26	09:00:00 - 18:00:00	09:00	Carlo Enrico Freschi	
2024-Nov-28	09:00:00 - 14:00:00	05:00	Carlo Enrico Freschi	

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 2 major non-conformities, 17 minor non-conformities, and 7 observations were raised.

The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to IWRAs.

The Client is requested to perform a root cause analysis, define corrective actions for each non-conformity, and submit these to WSAS within 30 days of receipt of the audit report, by 26 February 2025.

The major non-conformities must be closed within max 90 days of receipt of the report. To meet this timeline evidence is to be submitted to WSAS (within 75 days) by 12 April 2025.

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

The audit team recommends certification of Haleon - Site of Aprilia at the Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of Haleon Aprilia – Italy against the AWS International Water Stewardship Standard Version 2.
The Haleon Aprilia Site is in Via Nettunense 90, near Aprilia City, and is one of the Haleon Company manufacturing plants. The main business of Haleon is consumer healthcare products such as Over Counter products, Dietary Supplements, and Probiotics, with a capacity of around 100 million pieces per year
The audit was conducted onsite on 26, 27, and 28(am) November 2024.
The onsite site visit assessed its production processes, warehouse, laboratories, cooling towers, tank farm, boilers, chemical stores, WWTP, and WASH facilities.

FINDINGS

CERTIFICATION REPORT

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NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	17
Major	2

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

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FINDING DETAILS

Finding No:	TNR-015749
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The site defined the ultimate water source and receiving water body however, the physical scope of the site was not clearly defined and mapped in line with the AWS Guidance, taking into account the water source (and its catchment), the water receiving body (and its catchment) and the other information gathered for this indicator.
Corrective action:	Site will include a summary table to state which figures contain the specific requirements of criteria 1.1.1 to help to clarify also the physical scope of the Site.

Finding No:	TNR-015052
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The process of identification of new stakeholders is not clear. The process of identifying the water challenges with the stakeholders is not effective or proactive, as it is mainly based on the previous relation related to the existing water site problems. No consultation of stakeholders on their water-related interests and challenges was observed.
Corrective action:	Aprilia Site will review the Stakeholder Prioritization List considering also following main categories: • Suppliers that operate in the same watershed as the facility and have water-using operations • Outsourced services (e.g., employee uniform laundry) • Neighbors • Peer Industry • Industrial Park tenants • Local water/wastewater utility providers • Local government regulators (e.g., catchment management committees) • NGOs • Academia • Community-based organizations • Vulnerable populations, women, minority, and Indigenous people Aprilia Site will also include in the stakeholder meeting outcomes more details (e.g., record of new/amended best practices, shared challenges, and/or opportunities and risks that were identified).

Finding No:	TNR-015239
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The site did not provide an evaluation of the high and low variances during the year taking into consideration that water availability for new processes is one of the identified challenges
Corrective action:	Aprilia Site will provide a double water balance to assess water consumption variance during the year.

Finding No:	TNR-015240
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Although the expected influence of the water flow related to the Haleon discharge is low, the site has not collected and evaluated the quality of the receiving body upstream / downstream of the municipal WWTP managed by the public water service
Corrective action:	Aprilia Site will contact the municipal supplier and ask for water quality data/status reports on the receiving waterbody. Otherwise, Aprilia Site will look for publicly available studies on the waterbody.

Finding No:	TNR-015241
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	In the event of intense rainfall or a high rate of water used to extinguish a fire, the inlet flow of the WWTP must be reduced and a bypass activated, but the emergency plan does not assess the management, the final delivery, and the related consequences for these polluted waters.
Corrective action:	Aprilia Site will update the ERP to assess polluted waters management. Aprilia Site is evaluating the engagement of a external and qualified contractor to manage environmental incidents.

Finding No:	TNR-015242
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	The water-related costs divided between industrial and managing water stewardship were not considered for both short-term and long-term investments. The current cost analysis does not include the site's financial commitment and resources to support them
Corrective action:	Aprilia Site will include short-term and long-term investment costs (heat pump, boiler dismission, stormwater tank etc.) in the water template cost.

Finding No:	TNR-015244
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Site has not identified yet possible opportunities for water stewardship collective action from the water governance initiatives listed. The site should document its understanding of relevant governance institutions, including their initiatives, plans, policies, and goals relevant to the catchment, and also understand how changes are planned and made. This will give the site a better overview of possible opportunities for water stewardship collective action
Corrective action:	Aprilia Site is joining the Unindustria meetings with several local industries. The scope of meetings is to collect shared-challenges of different water users and propose to local authorities in order to create/update regulations or guidelines related to water management (i.e. guidelines for industrial water reuses).

Finding No:	TNR-015246
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The site has gathered considerable varied information for this indicator but has not yet identified a water balance in line with AWS guidance.
Corrective action:	Aprilia Site will provide a double water balance to assess water consumption variance during the year.

Finding No:	TNR-015771
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 identified IWRAs are not evaluated in terms of their actual status.
Corrective action:	Aprilia Site will provide photos of the on-site IWRAs to assess their general status. Data about Sorgente Del Carano could be provided if are publicly available due to it is an area managed by the Municipal Supplier to provide safe and drinking water to Aprilia City so it's not accessible to people.

Finding No:	TNR-015248
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The identified water risks are identified but not quantified and prioritized according to the likelihood and severity of impact, and potential costs and business impact of these were not identified.
Corrective action:	Water risks list will include potential costs and impacts.

Finding No:	TNR-015250
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site should provide evidence of water balance practices, that would be considered best practices in the context of their sector, site, and/or catchment (for example following BAT2 and 7). The site has not yet defined a rationale and a process for clearly defining its best practices (this last comment is valid for all 1.8 indicators).

Finding No:	TNR-015774
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Minor
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	(related to all 1.8 indicators): The site has not yet defined a rationale and a process for defining its best practices applied to its water balance.

Finding No:	TNR-015251
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site should provide evidence of dentification of best practices for water quality (for example following BAT 3 and 4)

Finding No:	TNR-015252
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site should provide evidence on identifying best practices for maintenance of site and catchment IWRA.

Finding No:	TNR-015253
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
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:	The AWS plan defines for each planned action a set of intermediate targets measurable in terms of Kpi and progress: good project management practice requires the definition of the evaluation parameters for these intermediate steps from the beginning of the planning.

Finding No:	TNR-015255
Checklist Item No:	3.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	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.
Findings:	The site did not define quantified targets for the expected water volumetric reduction. The indicator of water efficiency is considered and evaluated as a site's efficiency index in the Quality Management system but is not included and evaluated in the AWS water stewardship plan.
Corrective action:	Aprilia Site will include in the WSP amount and respective percentage of water consumption reduction against annual targets.

Finding No:	TNR-015776
Checklist Item No:	3.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	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.
Findings:	The site did not define quantified targets for the expected water quality improvements related to the defined projects.
Corrective action:	Aprilia Site will include in the WSP water quality target for defined projects related to water quality (i.e. WWTP revamping, PiE Calculator)

Finding No:	TNR-015778
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Major
Due date:	2025-Apr-27
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has not planned or implemented projects/activities to maintain and/or enhance the identified IWRAs, or looked for partners to develop larger projects which would be too big on their own but would be a good collective action.
Corrective action:	Plan and complete an off-site activity in one of the IWRAs placed in the same site catchment engaging a local NGO: - Formal NGO engagement evidence by the 26th Feb 2025 containing activity plan. - Report of completed activity by the 12th of April 2025
Evidence of implementation:	Please find attached report of Haleon Aprilia off-site activities: - CleanUp Day in the Circeo National Park (included in the Aprilia Site IWRAs) - CleanUp Day report by PlasticFree Stakeholder - World Water Day celebration event in the Aprilia Primary School

Finding No:	TNR-015256
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2025-Apr-27
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site has not planned best practices related to the maintenance of identified IWRAs, so no implementation could be checked during the audit.
Corrective action:	EHS to include off-site activities in the EHS plan to ensure periodical maintenance/enhance activities in the IWRAs. EHS plan is periodically reviewed by Site Leadership Team in the governance meetings. - Documented EHSW Strategy/Plan by the 12th April 2025
Evidence of implementation:	Please find attached official and approved version of the Aprilia Site EHSW Plan. Plan has been reviewed and approved by the Site Leadership Team.

Finding No:	TNR-015257
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site identified a budget cost to support projects defined in the Water Stewardship Plan, but the relevant value creation after their implementation has not yet been evaluated.
Corrective action:	Aprilia Site will assess in the WSP water savings generated and value created by water projects.

Finding No:	TNR-015258
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site should complete the identification and quantification (when applicable) of shared value benefits in the catchment for all the WSP activities and not only for the underground aquifer study.

Finding No:	TNR-015259
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site did not define consultation efforts with stakeholders on its water stewardship performance.
Corrective action:	Aprilia Site will include the Stakeholder Engagement in the annual performance review (i.e. complete at least an annual stakeholder meeting to share Site Water Stewardship Performance).

Finding No:	TNR-015261
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site did not share the water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes.
Corrective action:	Aprilia Site will share the WSP and water management performance in the periodical Stakeholder meetings.

Finding No:	TNR-015262
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	A summary of the water stewardship performance was not yet distributed to interested parties.
Corrective action:	Aprilia Site will share the WSP and water management performance in the periodical Stakeholder meetings.

Finding No:	TNR-015264
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site's shared water-related challenges and efforts made to address these challenges have not been disclosed.
Corrective action:	Aprilia Site will disclose AWS output in the annual EMAS environmental statement.

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Finding No:	TNR-015265
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-28
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The site has not yet identified and disclosed efforts to engage stakeholders and coordinate and support public-sector agencies.
Corrective action:	Site will provide evidence of several tentatives of engagement of local authorities (mail, photo or meeting minutes where available).

Report Details

Report	Value
Report prepared by	Carlo Freschi
Report approved by	Lorenzo Brioschi
Report approved on (Date)	24/01/2025

Surveillance

Proposed date for next audit
2025-Mar-03

Stakeholder Announcements

Date of publication	Location
01/06/2024	Haleon website: https://www.haleon.com/our-impact/environment
01/06/2024	https://a4ws.org/wp-content/uploads/2024/08/AWS-000698-Haleon-Aprilia_StakeholderAnnouncement_Month-11_V3.0.pdf

Comment

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

Catchment Information

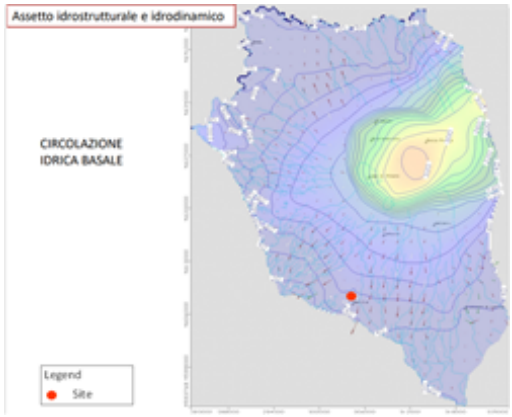
Catchment Information

The Site is located in the large "LATINA 1 - Costiero Sud" catchment, and in it is the sub-catchment "Astura River catchment".
The Astura River originates from Colli Albani (Albani hills), located north of Astura, where Albano and Nemi Lakes are located. The river has a length of around 17 km. The river flows through a predominantly agricultural territory with arable land. The water body closest to the Site is the Fosso della Ficoccia ditch, which takes its water from the Astura River. The ditch crosses various urban agglomerations and industrial settlements in the municipality of Aprilia, where it flows alongside municipal roads. The ditch is annually maintained but due to discharges from the Aprilia sewage system, there have been many reports of contamination.

The site is located within an area characterized by a rather poor level of water quality: the site is located between the 23 Loricina and 24 Astura river sub-catchment as defined by the Lazio Region as part of the studies for the implementation of the Regional Water Protection Plan, in which the quality of surface water has been assessed as "Very Bad" according to the current classification.

As regards the competencies in the field of Integrated Water service, the site is located within the Bacino Territoriale homogeneous. 4 (Southern Lazio – Latina), identified by the Regional Law no. 6 of 22 January 1996. Based on this Plan, the management of the Integrated Water Service was entrusted to a scope company founded with predominantly public capital Acqualatina SpA, and a private investor, through a specific agreement.
The canal system is under the responsibility of the North Coast Reclamation Consortium, established under Regional Law no. 4 of 21 January 1984, and which also deals with their maintenance and efficiency in bringing the water drained from the catchment to the sea. With a Regional Resolution, the entire regional area has been classified as a second-category reclamation area and six reclamation districts have been identified within which ten reclamation consortia have been defined.

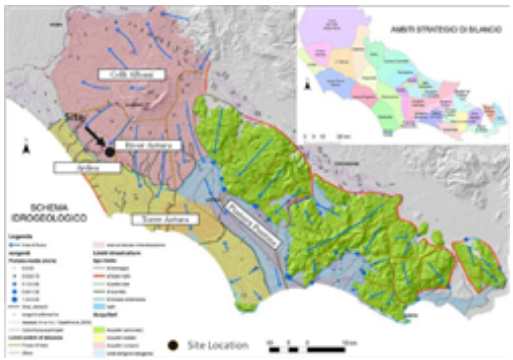
The main problems related to the environmental context in which the company is located are relative to the level of exploitation of the aquifer relevant for water abstraction, and the quality of surface water which might be influenced by the site final discharge. The municipality of Aprilia is included in the hydrogeological system of the Colli Albani, in particular in correspondence with the hydrogeological catchment of the watercourses of the western side, which from the Maschio dell'Artemisio, located in the central sector of the structure, extends to the Tyrrhenian coast, from the mouth of the Fosso Grande to the promontory of Anzio. In this area, the contribution of aquifers to the surface network (Fosso Spaccasassi, Fosso della Moletta, Rio Torto, Fosso Grande della Mola) and to the lake is currently reduced. Piezometry presents important dynamic piezometric depressions, including that of Campoleone-Aprilia.
A study was conducted by the Lazio Region, the Lazio Regional Basin Authority, the Tiber River Basin Authority, and the Roma Tre-Dip. Geological Sciences2 on the hydrogeological balance and the water resources available in the catchment shows that here the withdrawals have reached a rather high level (about 91% of the recharge value). This situation translates into the impoverishment of the water tables and the cancellation of the basic flow of the watercourses. The plant located within this area is classified as "critical"3. Nevertheless, the company has presented to the competent authorities a project for the expansion and development of the area and production site to obtain environmental authorizations that allow the company to have accessibility to greater quantities of water for industrial use. This request, supported by a joint project with other companies, is based on the fact that the largest user of water within the catchment was a company in the food sector that has now ceased operations and therefore part of its original consumption could be reallocated without providing an impact on the underground water level.



3 Groundwater levels and direction.PNG

2 Sub-catchment (costiero sud) watershed and important lakes and rivers (google satellite).png

2 sub catchemnt .png



1 Hydrogeologic map of the province of Latina(1) catchment .PNG

Comment

Client Description and Site Details

Client/Site Background
Haleon Italy Manufacturing S.r.l. is a company belonging to the Haleon group, but with its own CEO and board of directors who certify its autonomy in the field of environmental and safety management in accordance with current regulations of the parent company.

Aprilia Plant expands for a total of 133.000 m2, of which 27.000 m2 are dedicated to manufacturing areas, utilities, and storage areas.
The industrial settlement consists of a production plant divided into various areas:
a) Production departments and control laboratories for an area of approximately 16,055 m2, on one or two floors.
b) Storage warehouses for an extension of about 6,500 m2.
c) Offices and services for an area of about 11,400 m2, on two floors.
d) Utilities for an area of about 2,341 m2
e) Uncovered area 106,793 m2 of which 45,207 m2 with about 445 tall plantations.

Approx 600 people work on the site.

In the Aprilia plant, there is the production of non-sterile, solid, ethical, and over-the-counter medicinal products. In dedicated areas, the manufacture and packaging of food supplements in solid form is carried out. A new process for packaging a gel product has also been introduced.
Production is mainly destined for foreign markets, and to a lesser extent for the Italian market.

The utilities and infrastructures for water management are:

2 Thermal power plants with 4 boilers powered by methane gas, for heating the rooms, producing hot water, and operating the drying ovens in the production departments.
2 boilers used for steam production
4 Refrigeration units, one of which is taken out of service, for the production of chilled water for the air conditioning systems of the production departments, offices and canteen
Fire-fighting system consisting of: a 450 m3 water storage tank, 3 pumps: one electric, one motor pump, and one jolly, a UNI45 and UNI70 hydrant system, and a powder and CO2 fire extinguisher system, an alarm system connected to a control unit communicating with the other fire extinguishing units, a smoke detection and sprinkler system.
The water system consists of an artesian well, connected to a tank with a capacity of 60 m3, a water treatment system with Sodium Hypochlorite and UV systems, and a system of main collectors and pipes.
A demineralized water system consists of 2 demineralizers, one of which is used to feed the thermal power plant and the other to power the thermal power plant and the glassware washers of the Control Laboratory.
Purified water system (exclusive use of departments related to the production cycle: dispensing, manufacturing departments, washing rooms, and QC laboratories) consisting of a system consisting of two reverse osmosis stages and an EDI (continuous electrode-ionizer) stage.
WWTP - Civil and industrial wastewater treatment plant of the activated sludge type with prolonged oxidation, whose outgoing water is discharged into the public sewer. Centrifuge for the treatment of sludge is present.

Figura 1: Sito produttivo Haleon Italy Manufacturing . S.r.l.

6 Haeon Aprilia Site .png

5 Site location within the sub-catchment of the Astura River watershed (google satellite)_page-0001.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site's identified shared water challenges are:
Water availability;
The Site is dependent on groundwater sources (for industrial processes) and municipal water (for internal use managed by Acqualatina S.p.a, ATO4).
Long□term water management may be achieved by undertaking measures to limit water withdrawal and consumption by adopting efficient processes and operations and spreading awareness among stakeholders (public entities and another production site in the area) to utilize the resource efficiently.
Water quality:
The Site discharges from its WWTP industrial and civil wastewater into the public sewer connected to the main municipal WWTP, having as final recipient the Fosso della Ficoccia, a heavily polluted ditch that is a branch of the Astura River with a final outlet in the near Tirreno Sea. Actions in coordination with the local authority and with the municipal WWTP are managed to improve the quality of the wastewater. In 2022, a WWTP equipment revamping was implemented to comply with wastewater discharge regulations issued by Acqulatina,
Water infrastructures:
The ATO4 potable water network supplying the Site faces substantial challenges, including high physical leakage rates, and old and corroded pipelines, leading to water losses and service interruptions, impacting reliability and costs.
WASH:
Since part of the population is unconnected to the sewage system, groundwater contamination could occur, which could lead to challenges for the Site in treating the incoming water, resulting in an increase of water□management costs. Moreover, the Site may face increased requirements and challenges related to wastewater collection and treatment, requiring possibly more effective waste management strategies. Regione Lazio features extensive sewage networks but faces substantial fluctuations in flow rate due to varying atmospheric conditions throughout the years. In
particular, 2020 saw increased volumes of rainwater entering the treatment plants.

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**
0.1.1	*Eligibility Criteria*
0.1.2	
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.* — Yes
Comment	The assessor, led by representatives of the AWS system, inspected the production departments, the warehouse of incoming raw materials, and the warehouse of finished products: in these areas, the management of chemical products and the methods of connecting the plants to the industrial sewer were discussed and positively evaluated. An inspection was subsequently carried out on the external parts and, in particular, on the utilities, the tank farm under construction, and the industrial wastewater treatment plant. The basin identified by the organization for the storage of emergency water and its shut-off valve was also inspected.
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.* — Yes
Comment	The site occupies one catchment
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.* — Yes
Comment	The 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 scope of the proposed certification is homogeneous with respect to the primary production system, water management, product, , 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.

in progress

Comment

The site provided several maps mapping the whole catchment giving details on the hydrogeologic catchment, Site Map, and water-related infrastructures.

Site Water Supply
Aprilia plant is supplied by Municipal Water to provide safe drinking water to the Site canteen and locker rooms. Municipal Water is managed by Acqualatina S.p.A. and related annual consumption is about 3,000 m3.
The origin of the water from where Acqualatina is taking its municipal drinking water is Aprilia Site is also allowed to withdraw 60,000 m3/year from an on-site authorized well according to the well authorization D.G.R. 7002_1988. Groundwater permits are managed and released by local authorities (Provincia di Latina). The actual well permit was obtained in 1998 for 30 years and included a list of each water user and respective water abstraction volumes placed in the same catchment basin. The actual annual consumption is about 110,000 m3. Aprilia site already asked for the well permit renewal to the Local Authority to increase the allowed water abstraction volume, and the new permit evaluation is ongoing. Groundwater is treated in a utility plant to remove pollutants (mainly arsenic) before storage in the on-site piezometric tank for site uses (demi, purified, and raw waters). The well also directly supply the fire-fighting system tank.
A lamination tank is going to be realized to reuse stormwater for irrigation. as part of the new project related to the new permit for higher well water consumption.

Site Wastewater Management
The site's Environmental Authorization (AUA - Autorizzazione Unica Ambientale n.7437/2017) disciplines air emission, external noise, and wastewater management. Aprilia site is used to treat all site wastewater (including civil wastewater from office areas) by an on-site biological WWTP before discharging in the municipal sewer. Civil wastewaters are treated again by Municipal WWTP located at via del Campo before discharging in the receiving waterbody properly named Fosso della Ficoccia. Waste area stormwater and filter washing areas are collected in the site WWTP. Stormwater is currently not treated before discharging it into the surface water. Aprilia site planned an on-site stormwater treatment for Tank Farm stormwater before conveying it in the on-site WWTP.
The onsite WWTP has a design capacity of 1500 PE, 6 m3/h. WWTP includes an Equalization tank, two oxidation tanks, and two secondary sedimentation lines. Sludges are treated and recirculated within oxidation tank I and sedimentation lines.

Finding No: TNR-015749

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.*	in progress
Comment	The identified stakeholders represent parties with whom the site had already entered into relationships in the past for the management of its water-related site authorization issues, mainly related to the scarcity of supply or the quality of the effluent. A criterion for identifying stakeholders, starting a consultation, and identifying their expectations has not been defined. The site took into consideration its SH from the following groups: public sector, local government, local community, regulatory body, neighboring industry, service provider, NGO, and internal employees. Haleon presented tables summarizing for each SH: : SH group, SH name, influence on SH; interest of SH, evaluation of importance, level of influence of site on SH, SH water-related challenge, interest or concern, the SH Water Related Challenges, Interests, Concerns, level of engagement, details of contacts and interactions, New or Existing Relationship. ***Finding No: TNR-015052***	
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 site defined a procedure to identify the current and potential degree of influence between the site and its stakeholders based on an initial meeting on the AWS system and the recording of the reason why the stakeholder is important for the site and vice versa.
If, after the engagement, the influence and interest are deemed lower or higher, it can be changed.

In the initial phase of listing potential stakeholders having a level of interest in water, the following list was prepared.

High Interest:
- Acqualatina S.p.a., municipal water supplier
- North Coast Reclamation Consortium (CBLN)
- Latina Province
- Lazio Region
- ARPA Lazio (ARPA: "Regional Environmental Protection Agency". It is the regional environmental protection agency for Lazio)
- ASL Latina

Moderate interest:
- Employees
- Abbvie S.r.l.
- Catalent Pharma Solutions S.P.A.
- Intervet Productions S.r.l.
- Arset S.r.l.
- Soc. Irvim Elettronica S.P.A.
- Soc. Cosmet S.P.A.

Low interest:
- Environmental Wildlife Guard

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

Aprilia site has an Emergency Response Plan to remediate adverse events such as fire, explosion, spillage, loss of containment, etc.
Aprilia Site has also a Site Risk Register and a Business Continuity Plan to map the site's major risks and mitigate them when occur.
Aprilia Site performed environmental risk assessment in all site areas to map environmental risks and mitigate them when required.
The identified major water-related risks of an incident are related to:

Overflow of the WWTP Plant ;
Spreading of extinguishing water in case of fire;
Flooding of plant areas.

For chemical spills and spills, a specific procedure defines the actions to be taken in case of an event. During the site walk the chemical absorbent emergency kit was checked near the pollution points, accessible, with type and quantity suitable for the chemicals stored.

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

Comment

All the main points of water intake, process uses and final discharge point are correctly monitored and metered with adequate instrumentation.

The inlet water pumped from the well is divided into four macro-uses:
1) irrigation: a part of the water pumped is used for the irrigation of the green areas of the entire plant
2) antifire: a 500 cubic meter fire-fighting tank is kept constantly at a full level in order to ensure its immediate use in the event of an emergency. consumption in 2023 derives from plant maintenance/modification interventions for which it was necessary to empty and replenish the system circuit (about 30 cubic meters).
3) evaporation towers & chillers: the largest amount of water consumption is given by the eight evaporative towers with nominal capacity 1652 l x 4 and 1826 l x 4 served by three refrigeration units
4) piezometric tank from which it branches off into the various users. The piezometric tank has a capacity of 50 cubic meters and has the function of accumulating/storing treated water ready to be distributed in the service lines.
The treatments provided are as follows:
- DEARSENIFICATION: Plant consisting of 2 tanks capable of processing up to 30 mc/h and returning water decontaminated from arsenic thanks to the use of iron hydroxide
- FILTRATION: Further filtration process using quartz sand in decreasing grain aimed at the coarse removal of any residues present.
- CHLORINATION: Initial chlorination process carried out in a volumetric manner.
- UV LAMPS: Process for bacterial decontamination of water by exposure to UV rays of water

Once the preliminary treatments have been completed, the water is stored in the piezometric tank and kept perpetually in motion thanks to adjacent pumps. If necessary, the water undergoes a second chlorination.
The lines used for the civil use of water consist of toilets, changing rooms, etc., for the staff of the plant. The lines belonging to the Utilities, on the other hand, consist of hot water and purified water production systems, steam generators to meet the energy needs of the entire plant as well as all plant washing and maintenance activities.

In addition to the water pumped from the well, the site uses public drinking water for the users of the canteen and the staff toilets.

The outlet water both from industrial production and from civil uses is collected and treated in the WWTP and discharged to the municipal sewer. The flow is monitored. It becomes part of the public wastewater collection heading to a main town wastewater treatment plan managed by the public authorities.

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.*

No

Comment

Aprilia site presented the 2023 water balance and the 2024 current year's water balance forecast. Water consumption varies seasonally as there is a greater Use for refrigeration units and evaporative towers. In the area, the water management authorities do not impose limitations on the use of water in summer as the availability does not vary significantly with the season, so there is no direct influence between the water consumption of the plant and the availability of water outside in the catchment. (the supply point of the aqueduct is the Sorgente del Carano (identified as IWRA), which is outside the influence of the site.

Finding No: TNR-015239

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.*

No

Comment

The WWTP of Haeon has a permit to discharge into the public sewer in which it mixes with all the wastewater collected in the area. The water is then conveyed to the municipal wastewater plant, which in turn carries out a subsequent treatment before being released into the river.
The site did not collect information on the final receiving body.
According to the site AUA authorization, the site performs wastewater samplings to control and check the WWTP status with weekly analysis, monthly monitoring to check specific parameters such as COD, BOD, SST, P, N, etc., and a complete analysis every 6 months.
Aprilia site also monitors stormwater, municipal water, and groundwater (after Utility treatments) annually. The quality of the wastewater is not related to a seasonal variance.
Site effluent water is tested for COD externally by a laboratory that is ISO 17025 accredited, while pH and conductivity are done by the internal laboratory. The data are available for annual variance but are not currently tracked or trended by Haleon.
The site also provides constant monitoring of all other significant waters: water arriving from the aqueduct for drinking use, well water, water after the arsenic removal plant, and rainwater discharge.
All the test relating to the sampling are timely managed through a general schedule on the SAP computer system.

Finding No: TNR-015240

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

Obs.

Comment

EHS risks are regularly assessed and periodically reviewed in the Environmental Risk Assessment according to site internal procedure (EHS31) and Local Regulations based on a detailed map of potential sources of pollution. .
The risks are identified in the EHS document "31_Identificazione and assessment of environmental aspects and risks at work". The risks are then evaluated in the document Environmental Risks Matrix - May 2023.

Samples of risks identified for releases into sewers, surface water, and groundwater, have been positively controlled during the assessment in a documental way and the relevant management requirements were checked during the site tour.

In the event of an emergency such as flooding due to extraordinary rain OR To consequence of water use to extinguish a fire, the water leaving the production site is diverted by closing a special shutter to a specially identified depressed green area in order not to discharge it to the external purification plant. This basin is currently maintained.

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

Yes

Comment

The site provided a map with all the IWRA identified by the Municipality of Aprilia on its territory.
The Site is located in a flooding risk area based on PRG (Municipal Master Plan). In addition, there are archaeological (ancient Roman road) and legislative (declassified water courses) constraints near the Site's boundary.
No farmers and/or agricultural landowners as well as industrial associations in the vicinity of the Plant and within the industrial area have been identified.

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.*

in progress

Comment	The site provided a document: Aprilia Site Water Related Costs with a three-year detailed analysis and forecast. The costs are divided into two main categories: Inlet water costs: supply costs, contract costs, utility salaries, incoming water treatment costs, maintenance costs for water-related equipment, and heating and cooling energy costs. Personal training. Outlet water costs: discharge costs, contract costs, utility salaries, outgoing water treatment costs, sampling and testing costs, maintenance costs, energy costs, and personal training. ***Finding No: TNR-015242***	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	During the onsite walk the following were positively checked in quality, number (including contracted workers), hygiene, and safety. : dressing rooms including sink, WC, and shower which are provided divided by gender located in both the production area and office area. Wastewater from WASH facilities is connected to the site WWTP and from there to the municipal facility.	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes
Comment	The site reviewed its primary inputs, and the result was that none of them was coming from the catchment. The site implemented a process shared with the internal Purchasing department to evaluate all its suppliers and where they are located. No primary inputs/goods that go into the product are created within the catchment, including packaging.	
1.4.2	*The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*	Yes
Comment	The site individuated as outsourced services within the catchment, only the laundry and the supply of dispenser water beverages for employees. Laundry is the only service located outside the site in an external area not directly connected with the catchment	
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.*	Obs.

Comment

The site maintains many communications with the authorities that control the management of water in the catchment on specific problems directly related to their authorizations for the withdrawal of water and for the discharge of wastewater.
Obtaining and properly managing these authorizations is essential for the proper management of the site.

The site has implemented a system resulting in the management of a table with an analysis of the following aspects:
- Type of catchment□wide water□related plan/policy/initiative/goal
- Reference
- Implementation Agency
- Short description of the relevant aspects of the catchment□wide plan/policy/initiative/goal

The table contains a clear indication of the governance duties of each public authority/agency and its responsibilities and involvement in identifying water-related governance, policies, and plans.
However, the site has not yet extended the system in accordance with its AWS policy to cover the identification of common initiatives of a higher level of governance and water stewardship plans and strategies.

As an example, some of the main topics are related to:
- Regione Lazio: underground water availability: governance of potential water sources available to meet the needs,
- Minister of the Environment and Energy Security: flood risk management is defined, highlighting, in particular, the reduction of potential negative consequences for human health, land, property, the environment, cultural heritage, and economy.
- Regione LAzio and Acqualatina: Protection, governance, and public management of water, which the Region sets itself the objective of promoting conditions for the definition and development of a public and participatory government of the entire integrated of water, capable of guaranteeing its sustainable and fair use.

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

Yes

Comment

The site uses a dedicated software (ARS) to manage periodical EHS aspects and to be updated on the latest EHS news and regulation.
The site provided a table used to manage the legal requirements of all water-related legal and regulatory requirements that apply to the site.
Water-related regulatory requirements at the site level include permits for wastewater effluents (AUA), legionella control (state law), and WASH requirements including the potable water characteristics to be maintained from the site entry point to every point of use.

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

No

Comment

The site did not provide a general catchment water balance (surface and groundwater) to highlight the interconnections with the site water management and its influence on it.
The site provided other documents shared with Local Authorities with a technical study developed by a geologist to provide evidence of the underground water situation in the area.

The site has started to evaluate some data on the availability of water in the catchment and in detail the data of the Supply of Corano and Campoleone, as well as a study on the presence of arsenic in the water,
Data on the subsoil water flow rate available for pumping are available and evaluated in the context of the project of increasing the flow rate of wells, but not yet included in a broader catchment water balance.

Finding No: TNR-015246

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*

Yes

Comment

The site keeps under control the catchment underground water quality and implemented several treatments on its well water before using it in its manufacturing processes. The quality of the water is monitored with periodical control.
The quality of the water is not subject to variance during the year.
The presence of arsenic due to underground geological configuration is also an IWRA concern for the Municipality. The water is treated and purified before distribution as potable water in the area.

The effect of the water discharged into the sewer and after the municipal WWTP will be evaluated in future (see also the NCm of indicator 1.1.1)

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.*

No

Comment

The Site identified Important Water-Related Areas (IWRAs) on-site and off-site described in the following documents:
a) List of Important Water-related Areas.pdf
b) Map of Important Water-Related Areas – on Site.png
c) Map of Important Water-Related Areas – in Site's Catchment.png

The IWRA in site are:
Archeological area: An ancient Roman road is located to the northeast of the site which is considered an archaeological constraint.
Declassified water courses: Declassified water courses are located northeast of the Site, which implies legislative constraints.
Flood hazardous area: A flood hazardous area is located to the northwest of the site, which implies legislative constraints as the area needs to
be managed to reduce the chance of flood.

The main IWRA in the catchment are:
Sorgente del Carano: Sorgente del Carano, or the Carano spring, is a significant water source supplying the Pontine Aqueduct, as it utilizes wells to tap into the underground aquifer flow originating from the Colli Albani aquifer. Situated in an area abundant with a buried, highly permeable lava flow, fractured in nature, these wells act as conduits for the underground water
flow. The well field is not open to the public and is managed by Acqualatina.
Astura River: The River Astura holds great significance for the municipality of Aprilia due to its proximity to the site. Originating from a branch of the Allacciante Astura near Torre Astura, which marks the border between the provinces of Rome and Latina, this river stretches for approximately 17 kilometers from its mouth to the confluence of the main ditches. In the southern part of the Astura basin, a network of torrential watercourses are located.
Other IWRA are:
Pianura Pontina
Lake Nemi
Circeo National Park
Piscina Della Verdesca
Lake Fogliano
Castelli Romani
Regional Park
Mediterranean Sea

Finding No: TNR-015771

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

Yes

Comment

The site attached three documents describing water-related infrastructure in the Site and catchment.

As regards the public infrastructures for the management of the catchment area, the reference body is ATO 4, which is the body for the management of the integrated water service. ATO4 has issued its report with the quality objectives and the intervention program for maintenance and strategic works that the site has taken into consideration. According to the law, all water service operators in the different regions In Italy must adopt a tool for the assessment of potential risks to extreme weather events.
As far as the site is concerned, a project is being studied to extend the equalization tank at the inlet of the WWTP for the lamination of the flow peaks in the event of significant events of rain. The control of the maximum flow

Acqualatina, which manages the public downstream treatment plant requested a lamination of the water flowrate in case of high quantity to be released gradually during agreed night hours in order not to overload its public plant. In this regard, Haleon has opened a specific CAPEX (with a project included in the AWS Plan)

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

Comment

The access and availability of water and in general of all the WASH for the population in Italy is guaranteed by law.
Nevertheless, the site has carried out a specific investigation with questionnaire to detect accessibility and compliance with WASHs within the site for some categories such as office workers, plant operators, external suppliers, drivers, staff working remotely, point this assessment was made on the following topics: availability of drinking water availability of toilets with soap and easily accessible, availability of feminine hygiene products in toilets, degree of cleanliness of toilets. The results of the analyzes are all positive.

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.* Yes

Comment

The site has carried out a study of its shared water challenges, but the process can be improved according to the action taken in reference to the NC raised in point 1.2.1.
The site provided a list of the potential water challenges within the catchment and mapped them in a table.
The map contains each water challenge the relevance/rationale for stakeholders and the relevance/rationale for the site, the priority for the site, and the rationale for prioritization. All challenges are prioritized as high.
The main water challenges are:
- Water availability;a
- Water quality;
- Water infrastructures.

The process is based on internal information and evaluation criteria

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

Comment

The site presented two documents:
Shared Challenges containing the identified challenges for each one of the four Water Challenges with a high priority.
Haleon Water Stewardship Action Plan_Aprilia_contening the main actions related to the objectives

Initiatives coming from the identified challenges have been identified and included in the Water Stewardship Plan.
One of the main initiatives which can be described as an example is:
Water availability : Actions: "
1. Evaluate the feasibility of creating a detailed hydrogeologic study for the Site's area through the implementation of a groundwater model. The study can be used as a management tool. "
2. Evaluate the feasibility of drilling monitoring wells to allow for periodic assessment of groundwater situation (i.e., water level, water quality).
3. Align with Haleon best practices on water usage reduction and implement water reduction policies (e.g., closed-loop cooling tower design to reduce 30% of current water consumption, stormwater reuse, implementation of automation system in production cleaning, low water consumption and high-efficiency technology design, water leaks elimination, and water usage optimization).

The project is shared with :
1- The Government Agency (ADBAC - Autorità Di Bacino dell'Appennino Centrale) takes commitment to renew the Hydrogeolical Risk Assessment to have visibility on the actual status of the catchment;
2- Municipal Authority declared that many water users listed in the Well Permit released in 1998 are not still in use (i.e. One of the users listed in the permit was allowed to abstract 2.000.000 m3/y and dismissed manufacturing plant more than 10 years ago).1:1048576
3- The farm near Aprilia Site completed the well permit renewal to decrease water abstraction volumes from 600.000 m3/y to 150.000 m3/y.

A hydrogeological study will be conducted by Roma3 University after an official commitment from ADBAC (Autorità Di Bacino dell'Appennino Centrale) to continuously monitor the status of the catchment basin where Aprilia Site is located. Project forecast continuous monitoring of groundwater level for each new permit released and spot monitoring carried out by the University to monitor groundwater level on existing user points and have visibility on the actual status of the catchment. The project's due date is Dec-2025. Aprilia site will also be able to monitor independently the catchment status using monitoring drills that will be required by Local Authorities during the environmental authorization renewal (still ongoing with local authority).

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.*

in progress

Comment

The site identified but did not prioritize water issues/risks classified as physical, reputational, and regulatory.
The table is missing the evaluation of their likelihood and severity of impact within an identified timeframe, how they are prioritized, and the consequent potential costs, and business impact.

Finding No: TNR-015248

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

Yes

Comment	The site identified water opportunities classified as physical, reputational, and regulatory. For each opportunity, the site described its participation and an evaluation of the potential savings or business opportunities.	
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 site identified best practices for catchment water governance. These included a comprehensive water stewardship plan, employee training, engagement with peer plants in the catchment and within the group and communication of commitments. The site obtained the ISO 14001 environmental system certification the EMAS Registration and the Responsible Care certification which can be considered the best environmental governance issue according to BAT.1 Aprilia Site also joined Unindustria and has periodical benchmarking on water-related topics such as new regulations, best practices, new technologies, water-saving projects, etc.	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Obs.
Comment	The site identified best practices for water balance. These included installing meters, tracking water costs, maintaining utility and process systems, etc. In order to correctly manage its main water projects Aprilia site included in CAPEX plan different sustainability projects to reduce Site Water Consumption and improve water discharge quality. Aprilia Site agreed on sustainability targets with corporate stakeholders using the waterfall template to report the timeline of water-saving projects status.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Obs.
Comment	Aprilia site completed the Pharmaceuticals in the Environmental (PiE) Risk Assessment to determine areas, activities, and products that release APIs in the wastewater. Aprilia Site also completed an APIs mass balance to determine the APIs amount in the wastewater and submit results in the PiE Calculator tool as required by the Haleon Sustainability Program. The site has different water plants in the Utilities area to treat groundwater to be compliant with G&P regulations. All these actions can be classified as high-level activity, but the site should also consider the best practices.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Obs.
Comment	The site did not provide evidence of on-site and catchment best practices, that would be considered best practices for these IWRAs to be implemented with the help of other organizations and Stakeholders. These included maintaining and restoring onsite and offsite IWRAs.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Aprilia site launched a digital survey to better understand if access to safe drinking water is adequate for Haleon Employees. The site provide safe and drinking water to Haleon employees through the municipal supplier, groundwater treatments, and by free beverage services. Groundwater and Municipal water are periodically sampled to ensure compliance with local regulations (for example: analysis of potable water at local distribution points, legionella controls, etc. ill be checked)	

2	**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	The site is considered a starting point for the Group policy on the same water management commitment A corporate-level document on Haleon's position on water stewardship is also available on the Haloen.com website. The site identified a signed and disclosed site statement that includes the management commitments. signed by Site Director, SLT members have been onboarded during the EHS Council occurred in July 2024. The site commitments are: - 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 - The site will allocate resources to implement the standard. The statement was posted in its site lobby and It is published on the Halon Italy website. The stakeholder announcement has been published on the AWS network and the Haleon website.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes

Comment	The site identified a system that lists water-related compliance obligations, responsible people, and processes for submission to regulatory agencies. The organization chart for the AWS system has been published The site manages many water-related compliance obligations based on state, regional, and municipal rules. Aprilia Site uses dedicated software (ARS) to be compliant with Italian Regulations and complete environmental activities such as periodic wastewater samplings, groundwater abstraction communication, etc. EHS06 is the internal procedure that manages the WWTP according to Italian Regulations and Site Environmental Authorization. EHS06 defines the roles and responsibilities of wastewater management. The AWS system covers a clear process of all kinds of regulation management and the documentation, the definition of which person(s) or position(s) in the organizational structure has the responsibility to maintain compliance obligations for water and wastewater management who and when submits which types of required reports on water.
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	Haleon Group has a Corporate Water Policy on the Haleon Website. They are high level principles with mission, vision, and targets for Water globally. A description of the site's mission, vision, and goals towards good water stewardship at the site level starting from the corporate directives, is part of the water stewardship plan in coherence between the Targets and Actions. The main points of Its vision are for the sustainable and equitable management of water resources, recognising their impact on the resource. Its mission is to integrate water stewardship and waste circularity into its operations to meet targets to achieve AWS standard certification by 2025 and to achieve water neutrality. Its goals include increasing on-site efficiency, monitoring, awareness, and controls on-site, and working with stakeholders to implement best practices.
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.* 🔍 Obs.
Comment	The Water stewardship plan covers water challenges, risks, opportunities, and actions. Each action is associated with different targets, each with its, timing, responsible person, status, resources in terms of budget and manhours, and other criteria. Each project will be monitored with its KPI and reported.
2.4	*Demonstrate the site's responsiveness and resilience to respond to water risks*
2.4.1	*A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.* ✓ Yes

Comment	The site included water availability risk and related mitigation plan in the Site Business Continuity Plan. The site is developing new water-saving projects to reduce water consumption. The BCP will be released by the end of the year 2024. The Site has an ERP in place to face adverse events including spills or catastrophic events such as earthquakes etc. A drill is regularly performed to train the people to operate correctly in case of emergency. According to Italian law, the safety emergency plan for activities classified non highly dangerous must not be shared with the relevant public agency.

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	Aprilia site has periodical benchmarks with all Haleon networks by the Community of Practices organized by the Haleon Central Team. The site participates in the Business Network Meeting which takes place quarterly, some meetings are about water and some other items. Aprilia site has also internal governance meetings in place to monitor, review, and analyze Site energy consumption against targets. Meetings are managed by the Energy Manager. External activities: Unindustria is a private association of factories that organizes periodical meetings between members to have benchmarking for water-related topics. Haleon is a supporting member of these meetings. Acqualatina is the Municipal Supplier that manages public water and wastewater in Aprilia City. Consorzio di Bonifica del Litorale Nord (CBLN) is a public agency that is responsible for surface water bodies management. Haleon shares a technical discussion on the WWTP discharge water quality and a potable water supply. The PIE project is also of common interest, although the results are still under evaluation before an official disclosure. . Regione Lazio is the Regional Authority that organized the Conferenza dei Servizi (official meeting with relevant local authorities for the Site Environmental Authorization Renewal Request). The common interest is related to the possible increase of water spillage from the wells.
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	No water rights of others are affected by the site activity.
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	Aprilia Site is certified as ISO14001 and EMAS and its EHS management system is in place. The site uses a Legal Compliance spreadsheet based on a specialized SW called ARS: it includes Site Environmental Authorization Requirements to manage environmental activities such as samplings, monitoring, external communication, etc. the documents is shared with ISO 14001. ARS sends a periodical reminder to the task owner in case of a fixed tasks.
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 indigenous groups were identified during the stakeholder identification and engagement as the people living near the site, but no critical requirements or measures were identified. Nevertheless, the water rights of the local community surrounding the site are considered and they are mainly related to the quality of the waste waters discharged under several classifications.
Industrial wastewater discharge quality parameters as requested in the environmental authorization, minimize Site environmental impacts on the local community.
Also, stormwater is monitored once per year even if it's not required by Site Environmental Authorization.
The API monitoring to assess API concentration has been started on the wastewater even if this is not yet required by Italian Regulation.

Aprilia Site also monitors public water quality provided by the Municipal Supplier to ensure safe drinking water provisions to its employees on site.

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

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

Yes

Comment

The Water Stewardship Action Plan reports different actions related to a sustainable water balance.
Project status is monitored in dedicated councils and metrics are monitored in the Energy Meeting.

Aprilia Site included in the CAPEX plan different water-saving projects to reduce site water consumption.
Project status is monitored in dedicated councils and metrics are monitored in the Energy Meeting.
The site is currently waiting for the new permit for a higher flow from the wells issued by the Regione Lazio as agreed in the Conferenza dei Servizi. Up to now only preliminary technical meetings and document preparation has been completed.
The site already received all the approval to realize a natural buffer tank to reduce the discharge of rainwater into the surface water body. Rainwater will be collected in the buffer tank to be reused for on-site irrigation to reduce site water consumption. The project has not been completed yet.

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.*

in progress

Comment

Energy efficiency monitoring is part of the Haleon Sustainability Strategy that requests to map energy-saving opportunities and improvements. Water savings are directly connected to this Strategy.

A further investigation was performed on the water consumption: the site production with processes that do not have a significant water consumption. Nevertheless, at the level of the quality management system and energy control, an index has been defined for the control of the overall water consumption of the plant compared to production. to evaluate efficiency, measuring m3 of water used to produce a ton of product. This index is managed in the quality system and has not yet been introduced in the AWS system to identify a possible saving in overall water consumption.

Some activities aimed at reducing water consumption have recently been implemented such as the eruption of the double flow of water for the discharge of VC points, and the adoption of a cooling circuit for the granulator process that has been modified from water to disposable to closed circuit.
Actions present in the WSP are the reuse of second rainwater for irrigation, the decrease of wastewater from the reverse hormone plant, the improvement of thermal pasteurization cycles on purified water, and the reuse of discarded water for other uses used in evaporation towers.

Finding No: TNR-015255

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 does not reallocate water. In addition, the site indicated that its legally binding permit does not require the reallocation of water to social, cultural, or environmental needs.

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: The Water Stewardship Action Plan reports different actions related to water quality.
For its major AWP projects, Aprilia Site included in the CAPEX the plan for the WWTP revamping project which could be an opportunity to reuse wastewater before discharging and reduce Site water consumption and costs. The CAPEX is strictly monitored and regular management meetings confirm the activity step by step according to the initial schedule.

Aprilia Site assessed areas, activities, and processes that release APIs in the wastewater even if it's not required by the Site Environmental Authorization. The API project is defined in a specific internal procedure.
Aprilia Site completed an API mass balance to estimate the amount of API contained in the wastewater and report results in the PiE Calculator Tool. Up to now the results were good and the application did not end in any risk classified as red (high risk of pollution).

Haleon Central Team requested manufacturing sites to perform punctual samplings on the input and the output of the WWTP to confirm APIs mass balance assessment. Samplings have been completed by 21st September 2024. Aprilia Site has just received the results which will be evaluated in the next monthly meeting.

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.* — in progress

Comment: The outlet flow is always compliant with the permit limit. Periodical analyses are done on the effluent to keep continuous monitoring of the outlet flow.

Finding No: TNR-015776

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

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

Comment: Aprilia plant is placed near an ancient Roman road, a flood-hazardous area, and an area of declassified water courses then, the site may face limitations in expansion or the implementation of new water infrastructures due to archaeological constraints and relevant legislation.

Finding No: TNR-015778

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 site uses Municipal Water to ensure safe water in the canteen and in the locker rooms. The site monitors according to Italian Regulations the Municipal Water once per year. the site provided a set of documents to give evidence that it has listed all WASH facilities onsite and compared their provision against national regulations or guidelines, confirming that they meet the requirement (including legionella). Only once at the end of 2023, a problem was detected in relation to a parameter on water after an incorrect mixing manoeuver between aqueduct water and well water in any case already treated as industrial water. The situation was promptly managed and after a few days, the situation was resolved. in order to maintain good control and management of the internal pipings, the site provided a plan for the sampling to control all possible end-of-pipe distribution points.	
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	Wastewater sampling results report that the site wastewater discharge is compliant with local regulations and does not create problems at its discharge to the municipal sewer or after the municipal WWTP. Aprilia site monitor also rainwater to be aware of possible contamination The site water management is always focused on avoiding any potential possible impingement on the human right to water.	
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	
3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Yes
Comment	There are no targets on indirect use of water.	
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	No suppliers are in the site catchment of the site, so there is not opportunity to engage them on water stewardship process and there is no additional business risk. Aprilia site will quantify water consumption for laundry outsourced service, although the expected result is negligible.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	The site provided evidence of communication with the public company that manages the area public WWTP regarding the chemical characteristics of the water discharged into the public sewer and the possible regulation during the day in order to laminate the flow according to the plant requirements. Other documentation is available with the Regione Lazio concerning the request to improve the suction flow from the wells.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes

Comment	The site receives an EMS audit yearly from a third-party certification body to confirm its EMS 14001 certification and EMAS registration. The site engaged Unindustria to be represented in public meetings, and conventions with Public Authorities.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Site CAPEX plan includes several projects to reduce Site Water Consumption including the natural buffer tank to reuse collected stormwater for irrigation.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	Aprilia Site completed the API's mass balance and now it's performing wastewater samplings to assess API's concentration in the wastewater and submit results in the PiE. The API project is defined in a specific internal procedure. The project for WWTP revamping and improvement is also an action to achieve best practices, including the new section for phosphorous removal (sludge recirculation + injection of Ferrum chloride. Another application is the implementation of the PIE procedure to evaluate and control the final concentration of specific chemicals used in the production, in the final water recipient.	
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.*	No
Comment	The site did not start any action related to IWRAs. ***Finding No: TNR-015256***	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	The site launched the WASH survey and action will be taken accordingly if any problem will come from the evaluations of the replies.	

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 WSP is evaluated and updated in the monthly management EHS Council meetings.

The review is finalized to make a clear comparison of current performance against the targets set in the WSP, using the metrics for the respective targets e.g. actual water use efficiency compared to the target and to evaluate the contribution of each target to water stewardship outcomes.

The mid-year 2024 meeting is attached as evidence of the decision to start the AWS project. In next year's meetings, the evaluations will cover with more details the application and results achieved.

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

Comment: AWS action plan is included in the Site EHS Plan and periodically monitored in the EHS Council meetings. The WSP contains a section related to allocated resources and the potential cost of the risks.

The organisation should aim to provide a financial cost-benefit analysis and report in their investment in water stewardship

Finding No: TNR-015257

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

Comment: The study of the underground water basin and its water capability is related to the request of the site to improve the flows for its industrial uses, but it is also a shared challenge for other factories located in the same area with the same problem and for the local potable water provider which can all take benefit of the hydrogeologic evaluation of the basin.
The project is shared with Unindustria and other factories located nearby.
The site presented a technical study developed by a geologist to the Regional Authority during the Conferenza dei Servizi to demonstrate that the underground water basin catchment is in good condition. Regional Authority will upgrade the Local Regulation to unblock the release of new well permits in the Region.
The working group has recently received an official communication of the opening of a Conferenza di Servizi.

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

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

Comment

In case of adverse events, they are investigated and reported in the EHS system as required by internal procedures.
The Site also receives alerts and incident reports from other Group Company sites to assess and prevent the same situations on site. During the last year, no emergency situations related to water were experienced.
A few years ago the site experienced an emergency due to an out-of-limit concentration of phosphorus in the outlet from its WWTP, which has been managed correctly as a near miss as the value was higher than the internal limit defined as a precaution at a lower level than the official permit limit. As an action to solve the NC, the site decided on a process modification adding a new section for the iron chloride dosing pump.

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.*

No

Comment

Aprilia Site did not yet define an external communication plan towards relevant stakeholders identified in the Stakeholder Engagement Plan to provide consultation about the AWS commitment of Haleon Aprilia.
The site held recent meetings in November 2024 where only two nearby factories participated. These recent communications with SH were only related to gathering information about the AWS system and not
sharing site water stewardship performance with them. The site should communicate its water stewardship efforts to its stakeholders in order to get feedback on its performance.

Finding No: TNR-015259

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 Haleon corporate manages COP Communities of Practice. Every meeting will produce a report, and the record will be maintained (according to the general rules for documentation in common with the other management system).
For now, the site has not yet participated but a meeting between the managers of the AWS programs between the plants is planned. To date, there have only been informal meetings in which experiences on the certification process have been exchanged from the other plants already certified. (Maidenhead UK)

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts

5.1 *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

5.1.1 *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*

Yes

Comment: The duty holder matrix is in place and reviewed periodically. It includes all actors involved in each site-specific risk management, such as regulatory compliance and environmental sustainability, including water compliance.
The water stewardship organizational chart is shared with the EHS Council.
The AWS organizational chart is completed with the indication of the breakdown of each position accountable for compliance with water-related laws and regulations and the relevant identification of a responsible person.
The matrix is internally disclosed according to the site's standard procedure for the organization's charts and is also contained in the EMAS declaration, which is disclosed to the public on the website.

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.*

in progress

Comment: The stakeholder announcement with all relevant stakeholders was published on the company website. No communication as WSP or documents system was arranged.

Finding No: TNR-015261

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.*

in progress

Comment: The water stewardship plan is included in the Site EHS plan and periodically reviewed during EHS Council meetings.
A monthly meeting was held in July with an overview of the AWS in the implementation phase and in the last November of meeting a first evaluation of the implementation of the system was held.

Finding No: TNR-015262

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.*

in progress

Comment: Aprilia site uses governance meetings such as the EHS Council and the EMAS declaration for its external environmental communication. The last Dichiarzione Ambientale EMAS is dated September 2024.

The site will disclose documents on its water-related challenges only related to the management of its obligations related to environmental permits and authorizations.

Finding No: TNR-015264

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* — No

Comment: In relation to the permit to run the well for underground water exploitation, The site involved different public authorities in the Conferenza dei Servizi to request a new environmental authorization and an upgrade on local groundwater regulations, providing evidence to support.

Finding No: TNR-015265

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: Aprilia site investigates and reports each adverse event for the EHS Management System. Site Environmental Authorization does not provide escalation for water-related violations as per the air emission exceedance.

If there were any compliance violations within the AWS system, a description of the violation and associated corrections should be disclosed or made available to any stakeholder requesting the information.

There is a case in the past that can be cited as a good example of management: from the analysis of the outgoing WWTP water, a high value was detected (not yet above the authorization limit) for the presence of phosphorus. The problem was managed as a near miss as it is still considered an internal control. The problem was then handled as an internal non-conformity.

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

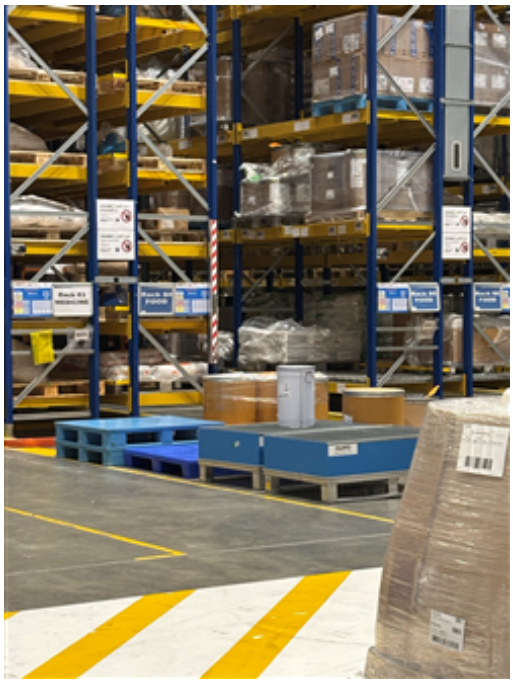
Comment: The site takes actions to address the causes of the violation if any, to prevent future occurrences of similar violations. These procedure is also covered by the certified EMS management system.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.* — Yes

Comment: The site never experienced episodes of violation of the environmental authorization that could lead to risks or threats to the health of the population or of SHs in general.

Photographic Evidence from Audit

Yes



15 chemical temporry storage.jpg

12 emergency kits.jpg

12 Basin for cheical storage and emergency kit.jpg

13 oil container.jpg

14 Dangerous liquid wastes segregated container.jpg

11 chemical refillig station.jpg

Upgrade or Downgrade of Certification

Justification for Upgrade or Downgrade

Summary of Evidence which led to change

Previous Findings

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

N/A