CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001382

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **La Galvanina S.p.A - Via della Torretta**
Address: Via della Torretta 2, 47923, Rimini, ITALY
Contact Person: Sabrina Mesisca
AWS Reference Number: AWS-000764
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-May-13
Validity of certificate: 2028-May-12

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Dec-10
Audit End Date: 2024-Dec-11
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Freschi, Inspector

Site Participants:
Sabrina Mesisca, Sustainability Manager
Eleonora Panici, Factory EHS Manager
Bruno Piscaglia, Project Engineer
Alessandro Carlucci, Quality Controller
Gianluca Privitera, CEO
Roberta de Stefano, Quality manager

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Dec-11	09:00:00 - 18:00:00	09:00	Carlo Enrico Freschi	
2024-Dec-10	09:00:00 - 18:00:00	09:00	Carlo Enrico Freschi	

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 4 major non-conformities, 15 minor non-conformities, and 5 observations were raised. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to Water governance, IWRAs, and water balance.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report, by 15 March 2025.

The major non-conformities must be closed within 90 days of receipt of the report. To meet this timeline evidence is to be submitted to WSAS (within 75 days) by 30 April 2025.

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

The audit team recommends certification of La Galvanina - site Via della Torretta - Rimini 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 corrective action plans addressing all findings.
Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of La Galvanina – site Via della Torretta, 2, 47923 Rimini RN – ITALY against the AWS International Water Stewardship Standard Version 2 - Core level.
The audit was conducted on-site the 10 and 11 December 2024.
The site is producing bottled water and beverages. The onsite site visit included assessing the production lines (stopped for yearly maintenance), the springs and interconnecting underground tunnel between the springs and the storage tanks in the site, the warehouse for inlet/outlet products, the chemical storage, the utilities, and the site WASH facilities.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	5
Minor	15
Major	4

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FINDING DETAILS

Finding No:	TNR-015268
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The site did not collect information on the agricultural creek receiving the rainwater discharged from the site, such as flow seasonal variance, variance in flow during extreme events, use as a source for agricultural uses, and similar, to get a better understanding of it.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001382

Finding No:	TNR-015269
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2025-May-20
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:	While the groundwater recharge area was mapped, insufficient information and mapping of relevant surface water catchment was provided: the description mentions Po River Basin but the site is not located in this river basin. The catchment map of the relevant river basin was not provided, nor was it named. This needs to be addressed prior to certification for the catchment to be named on the certificate. The map of the catchment is still a draft and must be confirmed and in line with the description of the area.
Corrective action:	To resolve the non-compliance, we will update our certification documentation to explicitly identify the F. Marecchia basin as a relevant catchment area. This update will include a clear map and explicit basin designation based on the detailed study of the “F. Marecchia conoid.” At the same time, we will explain that the inclusion of the Po basin map was only intended to provide a broader regional context and does not reflect the actual hydrological situation at the site. In addition, regarding rainwater In Via Torretta, rainwater is drained into a farm ditch, which in turn goes to the consortium ditch. This drainage system is managed by HERA, the company responsible for the water service infrastructure in the area. Regarding stormwater, the manual states: “Outgoing stormwater is quantified by assuming that the output is equal to the input and is discharged to a surface water body (the ditch adjacent to the plant), as prescribed by AUA
Evidence of implementation:	The updated hydrogeological report is attached, providing the mapping of the F. Marecchia river basin and the detailed identification of the site's physical scope.

CERTIFICATION REPORT

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Finding No:	TNR-015272
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Major
Due date:	2025-May-20
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 identifying AWS Stakeholders is not effective. There is not enough evidence of stakeholder consultation activities to identify the water related challenges of different stakeholders. In addition, the process does not define the person with whom to maintain the engagement.
Corrective action:	The way of identifying shared water-related challenges with stakeholders will be updated by proposing in-person or call meetings. During these meetings, Galvanina's commitment to embarking on the AWS journey will be explained, the importance of taking coordinated actions will be emphasized, and brainstorming time will be held to identify opportunities.
Evidence of implementation:	In-person meetings have been held with main stakeholder, in particular with the Municipality (meeting on 08/04). A summary email of the meeting with the Municipality is attached. A follow-up meeting is planned for May to discuss upcoming activities. The identification of the process of stakeholder identification is represented in the file "Identificazione Stakeholder_AWS Galvanina"

Finding No:	TNR-015277
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-May-20
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site did not map their on-site water flows (including inflows, losses, storage, and outflows).
Corrective action:	The annual water balance of the plant is mapped in the file "Site Water Balance Galvanina". In 2025, monitoring will be automated to have more accurate data Rev 1: a diagram will be constructed to schematize the water balance, drawing input and output flows and also reporting numerical values
Evidence of implementation:	Attached you can find the document Site Water Balance Galvanina Rev.0.

Finding No:	TNR-016156
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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 2024 site water balance contains the description of a water loss from the firefighting system, but there is no evidence of actions to identify and quantify the different related processes. The assumption that evaporation and losses are considered negligible and that Inputs=outputs is biased and hides the unaccounted water. Site should be aiming to quantify the unaccounted water and try to identify, and possibly quantify, the different processes that contribute to evaporative and other losses.
Corrective action:	The water balance shown during the audit refers to the year 2023, while 2024 was shown in preview but only referring to the partial period January-June. The leak in the fire-fighting system was caused by a broken valve, as reported in the water balance, and not by a failure to monitor the outgoing water. Rev1: We started from the basis that, by definition, any mass balance must return to zero. Considering that there are no thermal sources on the company that could cause evaporation, all inputs, whether measured or estimated, have been balanced by the outputs, also measured or estimated. In the water balance file, in column G ‘Data type’, it is specified whether the volume of water entered refers to a direct measurement or an estimate.

Finding No:	TNR-015279
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Although this is not a legal requirement, important info can come from the knowledge and monitoring of the quality of the rainwater discharge in terms of quality (the water is also collected in the roads, truck parking, and loading area) and its impact on the receiver.

Finding No:	TNR-016160
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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:	The site made a good first step in identifying the relevant competent bodies for water governance initiatives. However, the identification of underlying initiatives like catchment plans and public policies were not identified. The relevant River Basin Management Plan (implemented under the WFD) and its measures have not been identified.
Corrective action:	The main specific initiatives of competent bodies where identified in column 3 of the table in the paragraph "Competent bodies/Enti competenti" in the sub-AWS Handbook, for example "Piano di Tutela delle Acque PTA" and " Piano di gestione del Distretto Idrografico del Fiume Po PGDPO". During the first periodic evaluation specific meaures foreseen by these initiatives will be explored in detail and reported.

Finding No:	TNR-016758
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
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 should also identify the relevant groundwater body's (established under the WFD) quantitative status, to compare with the balance identified for the smaller groundwater catchment.

Finding No:	TNR-016162
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	Assessment of the receiving water body quality was not identified (and if appropriate any seasonal variances).
Corrective action:	We'll add in the sub-AWS Handbook the most recent available data (2020) regarding the quality status of Marecchia river (the receveing body after the WWTP) that we collected but not reported in the Handbook. In particular, ARPAE, the regional environmental body, collects data on the Marecchia river regarding both ecological and chemical status.

Finding No:	TNR-016569
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Major
Due date:	2025-May-20
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 submitted information is related to shared water infrastructure. No list of identified IWRAs containing a description of them, their status, and any water-related risks or threats to these areas was identified, using scientific information and through stakeholder engagement. The site should refer to the guidance on special subject - IWRAs, in the AWS standard and revisit this indicator.
Corrective action:	Galvanina acknowledges the nonconformity regarding the lack of a detailed IWRA list and recognizes the need to incorporate the classification of the Ex Cava In.Cal.System as an IWRA. To address this, Galvanina intends to contact the qualified stakeholder who highlighted Ex Cava's relevance. This outreach aims to gather further insights on how the stakeholder can support the process. Additionally, in the updated hydrogeological report, we will classify Ex Cava as an IWRA, in accordance with the guidance provided in the AWS standard.
Evidence of implementation:	As evidence for addressing the IWRA nonconformity, we are providing the following attachments: the updated hydrogeological report and the email to the Municipality regarding Galvanina's potential support for the Ex Cava site, now classified as an IWRA.

Finding No:	TNR-016164
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site did not collect and evaluate the General WASH data applicable to the area regarding the integrated water service.
Corrective action:	Corrective action not needed, because this aspect is already identified in the chapter of the sub-AWS Handbook "Infrastrutture del bacino/Catchment's infrastructures" where the aqueducts, sewage and WWTP are described, as an evidence of adequate access to safe water and hygiene. Rev1: a more detailed analysis of population access to potable water, percentages of residences connected to municipal sewers by taking information from reports and bibliographic sources such as ASviS 2024 report, ISS report, and statistics from ISTAT will be added to the sub-AWS Handbook under the WASH chapter

Finding No:	TNR-016573
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	There is a lack of evidence that shared water challenges were identified based on information gathered in step 1 and by linking the water challenges identified by stakeholders with the site's water challenges (refer to the finding on 1.2.1). And shared water challenges should be directly related to water: the Ecosister project seems to be very broad and indirectly related to water.
Corrective action:	In February, a new edition of the Ecosister project will begin, focusing on water-related challenges that we plan to leverage for the benefit of the site. Additionally, during year 2025 the Water Team will review Step 1 to ensure that the water challenges identified by stakeholders are properly aligned with the site's water issues and that the relevant shared water challenges are adequately addressed.

Finding No:	TNR-016165
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	Once the shared water challenge identification is revised in response to the finding on 1.6.1, this indicator should be revisited, by looking for existing initiatives to address those challenges, and new ideas.

Finding No:	TNR-016166
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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 current risk assessment is focussed on risks related to actions in the WSP or shared water challenges. A broader risk analysis is missing, covering physical risks to the site, regulatory, or reputational.
Corrective action:	We will provide full visibility of this analysis in our sustainability statement, which is scheduled for publication by the end of June, through a comprehensive double materiality analysis.

Finding No:	TNR-015287
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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 WSP does not contain quantified KPI in terms of water balance or savings related to the plant activity. Also, the clear indications of SMART targets for each goal would help monitor the following steps. knowing where the site wants to go with all the subsequent actions.
Corrective action:	This topic will be addressed by our Water Team during the first periodic review. At that time, we will define clear KPIs with associated objectives and integrate them into our Water Plan. We have already conducted a preliminary assessment of potential improvement measures at the factory and are exploring financing options to implement these interventions. Depending on which measures can be economically executed, the relevant KPIs and WSP will be defined and updated accordingly.

Finding No:	TNR-016169
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	(related to the previous finding on targets in the WSP). The status of progress towards meeting the water target can not be done until the clear water balance target is set.
Corrective action:	This KPI will be evaluated when the the water balance target will be set.

Finding No:	TNR-016158
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The KPI related to the embedded water is not considered in the AWS plan, and there is no project connected with its improvement. While no primary suppliers were identified in the catchment, site is invited to consider to identify the primary suppliers outside catchment in the future.

Finding No:	TNR-016382
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The site planned to engage the owners (HERA) about any concerns regarding the catchment infrastructures before the first surveillance audit but engagement was not yet done.
Corrective action:	The engagement with HERA regarding any concerns about the catchment infrastructures was performed in December 2024, and we are currently awaiting their response.

Finding No:	TNR-016173
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site did not perform a clear comparison of the current performance against the targets set in the WSP, using the metrics for the respective targets. This finding is related to finding in 2.3.2.
Corrective action:	This topic will be addressed by our Water Team during the first periodic review. At that time, we will define clear KPIs with associated objectives and integrate them into our Water Plan. We have already conducted a preliminary assessment of potential improvement measures at the factory and are exploring financing options to implement these interventions. Depending on which measures can be economically executed, the relevant KPIs and the WSP will be defined and updated accordingly.

Finding No:	TNR-015294
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site is at initial stages and has not yet clearly evaluated the shared value benefits to the catchment from implemented actions in the WSP.
Corrective action:	After the reinforced stakeholder engagement that we are currently performing we will update the WSP with the specific shared value benefits that we foresee.

Finding No:	TNR-015295
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The process of consultation has not yet been carried out. It is linked to the above finding 1.2.1 about the difficulty of identifying stakeholders.
Corrective action:	The process of consultation is ongoing and the result will be reported in the periodic evaluation module.

Finding No:	TNR-015297
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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 external communication on the AWS system has just started and the water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, has not yet been communicated to stakeholders.
Corrective action:	We plan to communicate the WSP to our stakeholders along with details on how it contributes to AWS Standard outcomes, by June 2025 in conjunction with the release of Galvanina's Sustainability Report.

Finding No:	TNR-015299
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The external communication summary of the site's water stewardship performance has not yet been completed.
Corrective action:	We plan to communicate the summary of the site WSP performance by June 2025 in conjunction with the release of Galvanina's Sustainability Report.

Finding No:	TNR-016174
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-11
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 the challenges have not yet been disclosed.
Corrective action:	We will update the WSP as soon as we identify specific shared water related challenges and we will report the efforts in our periodic evaluation.

Report Details

Report	Value
Report prepared by	Carlo Enrico Freschi
Report approved by	Lorenzo Brioschi
Report approved on (Date)	11/02/2025

Surveillance

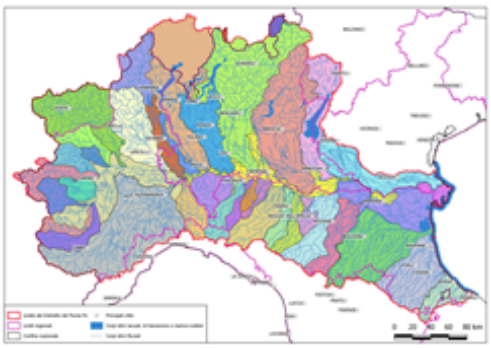
Proposed date for next audit
2026-Feb-16

Stakeholder Announcements

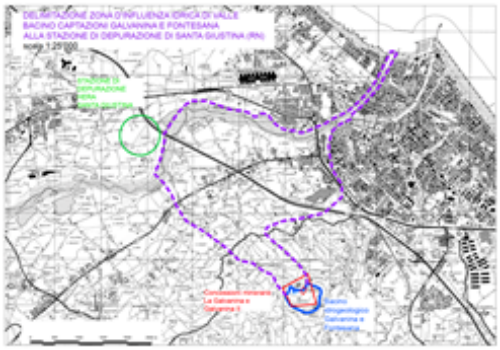
Date of publication	Location
01/06/2024	La Galvanina website: https://www.galvanina.com/chi-siamo/certificazioni/?_gl=1*o0ajx7*_up*MQ..*_ga*MjA5NTEzMTU5OC4xNzM1MDQ2ODEx*_ga_SYWZZDGMFB*MTczNTA0NjgxMC4xLjAuMTczNTA0NjgxMC4wLjAuMA..
01/06/2024	AWS website: https://a4ws.org/wp-content/uploads/2024/09/AWS-G-000032_La-Galvanina-Rimini_StakeholderAnnouncement_Jul24_V3.0-003.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 was verified during the audit.
The Lead Auditor did not receive any request for information or complaint before the audit.

Catchment Information

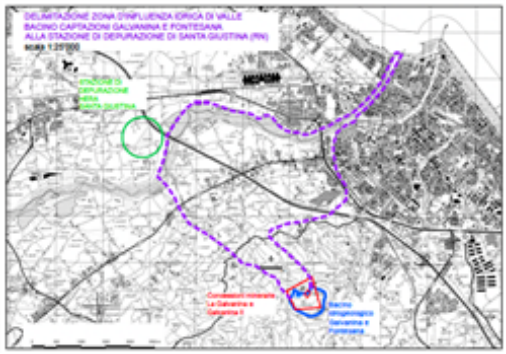


2 a bacino del po.jpeg



1.5_-_Confini_bacino-catchment_Galvanina%2c_blu_monte_-_viola_valle.png

4 Concession area .jpg



1.5 - Confini bacino-catchment Galvanina, blu monte - viola valle.png

3 Fonte Galvanina .jpg

1 Rimini.jpg

Catchment Information

The Name of the Catchment is Colle di Covignano – Conoide del Marecchia

Upstream:
Upstream the underground catchment basin has been identified in the Covignano hill where also the concession ara is located.
The catchment area is indicated as larger than the hydrogeological basin including the entire syncline structure identified longitudinally, and the monoclinal part from the permeable limit upstream of the geological formation of the Savignano Clays facies Red Cave.
The area of the catchment areas of Galvanina and Fontesana mineral waters concerns the following Lithostratigraphic series:
- Blue clays with a higher substrate, with low/no permeability (marly clays and marls clays of the middle-lower Pleistocene);
- Sandstone and Clay of Savignano, as a body of low/no permeability in the clayey part, with medium primary permeability in the upper sandy/arenaceous portion AQUIFER (lithofacies of the Red Grotto), of the Lower Pleistocene;
- Imola sands consist of sands and sandstones prevalent in MEDIUM/high permeability AQUIFERS primary, Middle Pleistocene.
The area of the concessions located inside the catchment is characterized by the important presence of aquifers above indicated according to an overall synclinal structure in the transverse direction (NO-SE), and of type monoclinal longitudinally from upstream to downstream (SW-NE),
The Buffer Zones, in compliance with Legislative Decree 152/06, art. 94 "Regulation of the areas of protection of the surface and groundwater intended for human consumption": The buffer zone consists of the portion of territory surrounding the absolute protection area to be subject to constraints and intended uses such as to protect the resource qualitatively and quantitatively water collected and can be divided into a restricted buffer zone and an enlarged buffer zone, depending on the type of intake or collection structure and the local situation of vulnerability and risk of the resource.
The springs and wells of the Soc. the Galvanina do not affect the needs of the nearby population, as the influences of the wells are limited and the springs are naturally outflowing.
In the middle of the catchment La Galvanina is the owner of the mineral water concessions called La Galvanina and Galvanina II of mineral waters for bottling, located in the territory of the Municipality of Rimini (RN), on the hills from San Fortunato, where the authorized water bottling catchments are located natural mineral Galvanina (Galvanina Spring and Galvanina Well 1) and Fontesana (Fontesana Spring and Pozzo Fontesana 1).
All the water sources of the two concessions are equipped with the hydraulic equipment necessary for their use and monitoring, with masonry and hydraulic works to protect against possible contamination, and the surrounding areas are designated as an Absolute Protection Area.
The Fontesana water is not currently used, even if at the time of use the estimated values of production could be assumed, with limited influence of the aquifer in pumped wells, and the springs with natural unforced outflow, therefore conservative in respect of the potential of the catchments and hydrogeological balance.
The industrial water for site utilities comes from the aqueduct network.
The Galvanina does not affect the needs of the population upstream or downstream.

Downstream:
Downstream, all the industrial water runoff streams which include the area connected to the site surface first rainwater channel, are pumped up to the municipal Santa Giustina WWTP plant with an authorized project potential of 560,000 IE. The water treated in the municipal WWTP is discharged into the Marecchia river which then flows into the Adriatic Sea.
As regards the limitation of the downstream basin with regard to the discharge into the sewer, the site considered that the influence of the Torretta site following the introduction of wastewater into the sewer is negligible.

Client Description and Site Details

7 tubazione.jpg

6 fonte storica.jpg

5 a stabilimento.jpg

5 b stabilimento .jpg

9 schema gallerie .jpeg

8 Fontanella.jpg

Client/Site Background

The plant is located on the outskirts of Rimini, Emilia-Romagna, Italy. The address is Via della Torretta, 2, 47923 Rimini (RN).
Galvanina manages three production sites in central Italy, in the Emilia-Romagna and Marche regions: via Torretta / Galvanina, via Popilia / Sacramora, and Val di Meti. The sites are located near the three sources from which mineral water supplies come. Each of the plants is responsible for producing different types of beverages. In 2023, Galvanina exported to over 50 countries around the world. Each site is implementing an AWS system.
The site to which this AWS system document refers is "Galvanina" via Torretta-Rimini; here, organic drinks and mixers, as well as iced teas, in glass, are produced and bottled. Mineral, still, and sparkling water can also be produced.
The building includes areas for the storage of raw materials, bottling, packaging, and shipping, and areas for office activities. Outside the building, but always within the perimeter of the property, there are silos for the storage of incoming water.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site's identified shared water challenges are:

With Area Territoriale di Ricerca di Bologna, parte del Consiglio Nazionale delle Ricerche (CNR):
- Connecting research at the University level and business with the project Ecosister

With SH PWC:
- Connecting universities and business: PwC will be the operator that will support ART-ER in the provision of the planned activities between the University of Parma, the Bologna Research Area, and Enterprises

With SH from the Indigenous population:
- Take care of the Buffer Zones of the Galvanina concessions
- To create awareness in the territory on the fact that water resources are managed with respect, by the law, and with continuous and voluntary improvement plans.

With SH Regione Emilia Romagna:
- Have up-to-date models for assessing the health status of the hydrogeological basins

With SH from Suppliers:
- water resource management to minimize waste

With Comune di Rimini:
- Enhancement of the Galvanina thermal baths now not in use; carry out activities within the territory.

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 onsite site visit included the assessment of the production lines (stopped for yearly maintenance), the springs and interconnecting underground tunnel between the springs and the storage tanks in the site, the warehouse for inlet/outlet products, the chemical storage, the utilities, the site WASH facilities.
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. La Galvanina owns three sites: VAl di Meti, Torretta, Valdimeti. Each site participates in the AWS program and will own its proper certification. All the documents related to the general company management are in common, while each site produces its own technical and application documents. The top management and owner of the AWS system process are the same for the three sites, and they are supported locally by the site structure.
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 concerning 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.*	No

Comment

The geographical area of reference for the operation of the site includes the areas where the water resource is withdrawn (springs and wells), the pipeline systems that connect the catchments to the plant described above, the plant itself and the point of discharge of wastewater into the surface water body; A map is provided by the site.

In general, the Galvanina plant has the following water infrastructure:
- Storage tanks: located between the plant and the Galvanina spring, there are 4 storage tanks for the storage of mineral water taken from springs and wells, before entering the plant. Pool 1 also has an overflow system to manage excess water. The size of the tanks varies from 150,000 to 290,000 litres.
- Production plant: the bottling plant is active inside the plant, which also includes the operations of washing the bottles and mixing the ingredients for the creation of drinks. In the building there are also toilets for staff and visitors;
- Discharge of processing water and first rain from the area used as a pallet storage area and future ecological island (for non dangerous wastes) : all the resulting water are collected in the industrial waste network to be discharged into the public sewer. Only the first rainwater, before connection to the drainage network, is accumulated in a first rain tank;
- Discharge of second rain water and rainwater from roofs/outdoor areas are instead conveyed into a surface water agricultural creek.
- Waste water from sanitaries: there is a first treatment in Imhoff tanks and the resulting flow is discharged to the public sewer.

There are several water flows, entering the plant for different uses and origins:
SPRINGS/WELLS for mineral water
Galvanina Spring: for mineral water
Fontesana Spring : for mineral water
Fontesana 1 Well for mineral water
Galvanina 1 Well for mineral water
- "Mineral water" flow for production: this flow refers to the water coming from the Galvanina spring of the "La Galvanina" concession, from the Galvanina 1 well, from the Fontesana spring (at the time of writing this report not used) and from the Fontesana 1 well of the "Galvanina II" mining concession. All the mineral water is conveyed to some storage tanks and then shipped to the storage silos inside the plant, from which it will be taken for production and bottling. In the case of the production of flavored water and soft drinks, at the exit of the hydraulic power plant, the water performs a preliminary passage in the syrup room for the creation of the drink;
- Another inlet flow is the "Service water" flow: this flow refers to the water coming from the municipal aqueduct network HERA, used for support services for the plant's activities.

There are water outlet flows originating from the plant:
- Bottled mineral water and other bottled products;
- Industrial wastewater and first rain: the site holds a permit for discharging industrial water up to 63,000m3/year with a limit of 3l/sec. The discharge is in the public collecting sewer connected to the municipal wastewater treatment plant Rimini WWTP - via Fiumicino 6 – Santa Giustina . after settling and degreasing pre-treatment.
- Sanitary waters of human origin inside the plan.
- the rainwater is discharged in a dry inter-farm drainage which then goes to an agricultural irrigation channel managed by a land reclamation consortium.

At the level of infrastructure ownership, all the artifacts falling within the mining concession (springs, wells, tanks, pipelines, storage silos) are untransferable assets of the State. The plant is connected to the public aqueduct.
All the hydraulic works of collection, sampling, and delivery pipes are made of stainless steel, with wall protection compartments also for vertical wells, with hydraulic and electrical equipment necessary for the correct lighting and management of the water points. The hygienic-sanitary aspects of the intake structures, pipelines, and silos are periodically monitored.
The verification of any water leaks is delegated to the operators who electronically and continuously monitor the flow of water entering the plant.

Finding No: TNR-015268
Finding No: TNR-015269

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.

closed

Comment

Galvanina identifies and lists the main stakeholders in a special matrix; considering both internal (e.g. employees) and external (e.g. public bodies) stakeholders.
All identified stakeholders are listed in a table and classified into:
- stakeholders involved by commercial interests (e.g. suppliers, customers),
- legal authorities (e.g. Municipality, Province, ARPA),
- community interests (e.g. residents of the district, universities, ONG).

Most stakeholders, whose identification is based on Galvanina's previous knowledge or relationship, are associated with shared challenges related to site water management.
Based on the required involvement and the shared challenges identified, specific engagement actions are defined.
Furthermore, each stakeholder may be associated with one or more risks or opportunities related to water management.
Each risk or opportunity is assessed based on the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it, both with a value assigned in the range from 1 to 3 for each aspect. The two values are combined with each other by means of a product to define the resulting significance of the risk or opportunity (Significance = Probability x Magnitude).
Each stakeholder can be associated with the three sites or with a single site.: its involvement is traced with the site of interest in the appropriate column so as to unequivocally identify the scope of interest..
The matrix, once drawn up, is periodically updated in all its parts.

Finding No: TNR-015272

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

To assess the appropriate degree of stakeholder expected involvement a level of interest and influence on water-related challenges are assigned and the two aspects are combined through a product (Required Involvement = Interest x Influence) with a value assigned in the range from 1 to 3 for each aspect.

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

Galvanina has an Environmental Management System certified according to ISO 14001:2015 standard. Within the system, environmental emergency management procedures are in place, to define the methods for managing an event potentially capable of contaminating a site or the activities related to the identification of historical contamination, in order to minimize the consequences of the event or contamination found and to coordinate emergency services, personnel, and company management.
The scope of the procedures is applicable to the site.

The site on June 19, 2024, made a drill for the management of an accidental chemical spill situation and the practical test of the procedures contained in the emergency plan.

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

closed

Comment

The Galvanina plant draws mineral water from four points: two natural springs, in which the water table rises naturally above the surface of the ground, and two wells, from which the water resource is pumped mechanically. There is also an aqueduct supply for service water. In the case of springs, there is no need to use energy carriers for water withdrawal, as it is only necessary to prepare a "container" of the latter. Since it is impossible to act on the natural water flow, once the tanks are 100% filled, the excess water that flows into this space simply grazes and returns to the ground.

To quantify the incoming water, there are meters arranged as follows:

- 2 meters for input water from Sorgente Galvanina and sorgente Fontesana
- 2 meters from the aqueduct (one used for civil and one used for industrial uses)

At the input level, the atmospheric precipitation volume is also considered; it is estimated starting from the millimeters of precipitation detected by the control station closest to the plant, multiplied by the reference area (15.355 square meters). The installation of the rain gauge is one of the targets of the AWS plan.
The water resource leaving the plant is quantified as the remaining water from the production control system, thanks to which it is possible to know the volume of bottled water and the number of units produced.

Finding No: TNR-015277

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.*

in progress

Comment

Between the tanks and the plant, there is a meter capable of quantifying the volume of water that flows inside for production purposes; there are also two meters at the plant for the supply of aqueducts intended for service uses.
For the output water, a production control system is active, thanks to which it is possible to know the volume of bottled water and the number of units produced. In addition, there is also a meter for measuring the discharge of industrial water into the public sewer. Rainwater, on the other hand, is collected and discharged into a neighbor's creek without treatment and without passing through a meter.
Evaporation and losses are considered negligible.

The annual water balance of the plant (where INPUT = OUTPUT) is therefore given by:
• INPUT: volume of bottleable water (Galvanina spring, Fontesana spring, Fontesana well 1, Galvanina well 1) + volume of service water (aqueduct) + volume of atmospheric precipitation on site.
• OUTPUT: volume of bottled water + volume of untreated water (collected atmospheric precipitation) + volume of treated wastewater (waste).

Finding No: TNR-016156

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.*	N/A

Comment

The controls of chemical-physical and microbiological parameters and flow rate are regulated within the Quality Management System. In general, the following checks are carried out:
- Sources, chemical-physical and microbiological analyses;
- Mineral water line, microbiological analyses every week;
- Softened water line, microbiological analyses every week;
- Bottled mineral waters, chemical-physical and microbiological analyses, on a sample basis for each production batch;
- Bottled drinks, chemical-physical and microbiological analyses, on a sample basis for each production batch.

Input water quality:
- As regards the input water resource, the Quality Management System provides a procedure that applies to the analysis of mineral water, non-alcoholic beverages, and mains water, an activity that is carried out in Galvanina's internal laboratory. The chemical-physical and microbiological controls to be carried out are provided in the "control plan" attached to the procedure. Since the laboratory is not accredited, a "feedback plan" has been prepared and attached to the procedure to compare the values obtained internally with the test reports of the external reference laboratory, accredited according to ISO 17025; if the internal results are out of range, the feedback analysis is performed again on the unacceptable result parameter.

- An external geologist is in charge of the annual inspection regarding the "Checks of the director responsible for cultivation points concessions obligations Legislative Decree 624/96". The latest DSS, Health and Safety Document coordinated under Legislative Decree 624/1996, was drawn up in September 2020 by SGAI Srl.
On 26/08/2010 the confirmation of the concession for the exploitation of the mineral water deposit "Galvanina II" located in the territory of Rimini was determined in favor of the company "La Galvanina Spa" based in Rimini Via della Torretta 2, with provision no. 264 issued by the province of Rimini. The duration of the continuation is 30 years, expiring on 27/04/2040. The "Galvanina" plant also has a perpetual concession "La Galvanina" located in the municipality of Rimini, registered with the Court of Auditors on 15/06/1931 (Reg. 3 – Corporations Sheet no. 260).
The working environment includes:
- Mineral water springs: Galvanina Spring, Fontesana Spring, Galvanina Well 1 and Fontesana Well 1;
- Spring rooms/underground cabins protection wells: containing the hydraulic works in stainless steel.
Galvanina is equipped with instruments for monitoring the chemical-physical parameters and flow rate of the pumped water. As part of the water collection and use cycle, the following activities are carried out:
- Control and management of the mineral water pumping system with sampling for chemical-physical and microbiological checks;
- Conveyance of water to the storage tanks of the bottling plant, through suitable adduction systems;
- Maintenance of water points: bleeding and sanitization, any interventions on the hydraulic valve, the submersible electric pump, electrical panels of the wells and lighting of the spring compartments, cleaning and small construction work on the protection compartments, any extraordinary maintenance
The Supervisor monitors the correct functioning of all works; in the event of critical issues, unless it can be resolved by the same Supervisor with the employees in charge, this is reported to the Employer and Responsible Director for subsequent delegation of intervention. Health and safety risks are assessed and managed; information on this is contained in the DSS.
***
Output water quality.
- Concerning wastewater discharges, Galvanina has an Autorizzazione Unica Ambientale (AUA) issued with resolution no. 2906 of 22/08/2016 to the "company la Galvanina SpA - registered office in via della Torretta, n° 2 Municipality of Rimini (RN) - Rimini plant located in via della Torretta 2 - carrying out the production and bottling of non-alcoholic and slightly alcoholic drinks and mineral waters".
The AUA is conditioned by the requirements contained in the HERA file n°42/2021 Request

for opinion Prot. 115105 of 22/12/2021, summarized in Annex B of the AUA.
- The industrial discharges allowed are those deriving from the production and bottling of soft drinks and fruit juices and first rainwater; rainwater flows from the area of 180m2 where non-dangerous wastes are located; domestic wastewater discharges are allowed in compliance with the technical standards of the Integrated Water Service Regulations; second rail waters to be discharged locally above ground.
- The discharge must comply with the emission limits indicated in Table B of the Integrated Water Service Regulations except:
  - BOD5 < = 1500mg/l;
  - COD < = 3000 mg/l;
- The exceptions of the previous point are granted based on a discharge volume not exceeding 63,000 cubic meters/year; 3 l/sec
- The industrial water must be treated in a grid, settling, oil, and grease removal tank;
- The flow must be measured and pumped to the sewer;
- The instruments will be periodically calibrated;

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

Yes

Comment

Galvanina monitors and manages the safety of the water it bottles, and consequently the potential sources of pollution, through implemented and certified systems:
HACCP (Hazard Analysis Critical Control Point), is an international standard based on the principles of the Codex Alimentarius. It defines the requirements for effective control of food safety. This methodology is currently the most widespread for assessing, with a preventive approach, the risks and dangers related to the hygienic safety of products, and production processes and for establishing appropriate control measures.
BRC (British Retail Consortium), is a global standard for food safety owned by the British Retail Consortium. Founded in 1998, it guarantees that branded products are obtained according to well-defined quality standards and in compliance with minimum requirements.
IFS FOOD (International Food Standard), aims to promote an effective selection of suppliers of food products by large-scale retailers, based on their ability to supply safe products that comply with contractual specifications and legal requirements. It is a model recognized both in Europe and in the rest of the world. This certification is also part of the food safety standards recognized by the Global Food Safety Initiative (GFSI).
Galvanina also manages legislative compliance, environmental protection, healthy workplaces, and personnel safety globally through the Environmental Management System according to the international standard ISO 14001:2015 and the Management System for Health and Safety at Work according to the international standard ISO 45001:2018, including the management of chemicals used in the laboratory (reagents), in maintenance activities (oils, greases, sealants and the like) and in the purification plant (sulfites and other chemicals necessary for the correct degradation of the organic load).
Galvanina, within the systems described above, has identified the accidental spillage of chemicals as the main source of potential pollution. To reduce the risk, the chemicals are grouped in the storage warehouse and placed on appropriate collection basins. Waste from chemical products is located in temporary storage and accompanied by a containment basin. There are also absorbent kits (towels, pillows, cuttlefish, etc.) for the immediate management of any emergency. A further source of potential pollution is the run-off of the external surfaces since it could carry pollution from accidental vehicles or spills from the temporary waste deposit. The Environmental Management System has not reported similar accidents so far therefore, the probability of occurrence is considered low. The temporary storage contains mainly non-hazardous waste in terms of volume and, to a lesser extent, hazardous waste (in any case resting on containment basins). Therefore, the severity of this type of accident is considered low. The risk resulting from the probability of damage is low, and it is not considered necessary to take mitigation actions.
The site provided a map for all the chemical storage in the warehouse and of the place of use inside the production.

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 identified 4 IWRA: spring and well named Galvanina and spring and well named Fontesana.
The area surrounding the catchments is designated as a Protected Area of Absolute Protection, as prescribed by Legislative Decree 152/06 art.94 paragraph 3, which establishes that: The absolute protection area consists of the area immediately surrounding the catchments or diversions; in the case of groundwater and, where possible, for surface waters, it must have an extension of at least ten meters in radius from the point of collection, it must be adequately protected and must be used exclusively for collection or intake works and service infrastructures.
Therefore, all the mineral water collection points of Galvanina and Fontesana are fully protected from any potential contaminants, within a fenced area of ownership and with controlled access.
In addition, in compliance with Legislative Decree 152/06, art. 94, the Buffer Zones have been defined for the hydrogeological protection of the resources, as circular areas with a radius of 200m with a center on catchments. They consist of portions of territory surrounding the areas of absolute protection, to be subject to constraints and intended uses such as to protect the water resource captured qualitatively and quantitatively. Some activities are prohibited in the buffer zones, as reported in the SGAI Report in Chapter 3.
No other important areas for water resources have been detected, nor have any further areas of risk been identified that could compromise the quality of the water resource under Galvanina's jurisdiction. In general, the company respects the areas in question by acting in compliance with the requirements of the mining concession, the Single Environmental Authorization, and the other applicable environmental legislative requirements (cf. SGA).

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

Yes

Comment

The following are taken into account in terms of costs:
- Variable bottling tax: Euro 1.04 per cubic meter;
- Water exploitation tax;
- Costs related to the water service;
- Variable maintenance costs of water infrastructure;
- Variable budget allocated to the AWS project for implementation of actions, payment of support consultants, payment of WSAS certification body, miscellaneous related to the project

The following are taken into account in terms of revenues:
- Turnover (item A.1 income statement): products shipped from the Galvanina plant in 2023.

The following are taken into account in terms of the value generated by the AWS system from a social, cultural, and environmental point of view:
- Enhancement of the Galvanina spring, already made known by the concessionaire, as a socio-cultural heritage of the territory, as a factor of social and economic development of the population of the district, as recognition of the valuable environmental resources of the medium and high hilly sector and as an incentive for the overall territorial excellence of the Province of Rimini.

All the objectives present within the Water Stewardship Plan are taken into account at the level of value generated by the AWS system, in which this value is identified and quantified.

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

Yes

Comment

During the inspection of the production plant, the availability of toilets and changing rooms were verified. Divided by gender and in adequate numbers by Italian legal requirements, Dlgs 81/08. The presence of a refreshment area and the availability for all operators of access to the water distributed free of charge was also verified.
Waters that fall under the definition of "Safe drinking water, sanitation, and hygiene" (WASH) are crucial for human health and well-being. In the Galvanina plant, all the water that is made available to employees comes from bottles of purchased mineral water, which each person can take through the water bottles provided. To avoid waste, all toilets are equipped with a double-button flush.

Therefore, there are no problems with people's access to clean and sufficient water to quench their thirst, prepare food or wash, nor access to decent quality toilets.
A procedure defines responsibilities, criteria, and operating methods for the management and execution of Cleaning and Sanitation, carried out within the site.

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

It should be noted that the study presented for the Torretta site refers to the Sacramora plant. However, considering the Galvanina plant is comparable to Sacramora in terms of production, the profile of the environmental impacts related to the hydrosphere is comparable, especially thinking in relative and not absolute terms.
Galvanina conducted an Organisational Water Footprint study concerning the Sacramora plant to assess the potential environmental impacts on water resources, deriving from its direct activities (energy consumption, emissions into the atmosphere and water, waste generated) and indirect activities (transport into the plant, procurement of raw materials, distribution of finished products). There are no suppliers of goods or services in the catchment area. In addition to what has just been described, the chemical analysis of the wastewater coming out of the purifier present in the company was also taken into consideration.
The Water Footprint study carried out was drawn up by ISO 14046, ISO 14040, and ISO 14044. The impact categories analyzed are as follows:

- Eutrophication terrestrial and freshwater (mol H+ eq);
- Eutrophication Freshwater (kg P eq.);
- Eutrophication Marine (kg N eq.);
- Freshwater Ecotoxicity (CTUe);
- Water Use (m3 depriv.).

An uncertainty analysis was conducted on the results that emerged to understand where to focus efforts to improve inventory analysis and have more accurate results. Currently, in the Water use category and concerning 2021 data, the main impact is given by the raw materials (ingredients) used to produce the beverages sold (85%). However, the value of uncertainty is very high due to the calculation method adopted, which is, in turn, influenced by the regionalization of datasets and the water balances of the field phase of the ingredients, which are not always closed due to lack of data.

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*

Yes

Comment

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

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.*

in progress

Comment

The most relevant competent bodies: involved in the water governance policies are::
MUNICIPALITY OF RIMINI: Control of the territory of competence, communications to citizens
PROVINCE OF RIMINI:: Water Protection Plan (PTA)
HERA Integrated Water Service Regulations
ARPAE – Emilia-Romagna Energy Environment Prevention Agency -
unica-ambientale-aua AUA Release
PO RIVER DISTRICT BASIN AUTHORITY Drafting of the Management Plan of the Po River Basin District (PGDPO), Flood Risk Management Plan (PGRA), Hydrogeological Asset Plan (PAI)
ROMAGNA RECLAMATION CONSORTIUM Hydraulic defense and the environment.
The site keeps good relations with all of them due to its legal water obligations.
New initiatives related to the AWS projects are just started. and to be developed.

Finding No: TNR-016160

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

Galvanina manages legislative compliance, environmental protection, workplace healthiness, and personnel safety globally through the Environmental Management System according to the international standard ISO 14001:2015 and the Occupational Health and Safety Management System according to the international standard ISO 45001:2018.
Evidence of compliance with the law are given by internal and third-party audits.

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

Obs.

Comment

The basin water balance is generally defined by a basic equation:
(Water Outflow) = (Water Inflow) + (Change in Storage Volume).
The water balance of a basin is commonly given by the combination of parameters relating to surface and groundwater interacting with each other and is normally carried out on a time scale of one year. It may also be appropriate to calculate it over a shorter timeframe if there is significant seasonal variability in availability and/or demand.

Below is a water balance hypothesis to estimate the amount of water that reaches the Galvanina II concession on average in a year:
For the upstream part, a hypothesis of upstream water balance to estimate the amount of water that reaches the Galvanina II concession on average in a year:

1. Average annual rainfall 2023: about 777.4 mm.
2. Average infiltration on the basin: 6.5%
3. Basin area: estimated 1.2 sq km
4. Runoff: on average 22%
5. Evapotranspiration: 580mm
6. Total balance value: about 1.7 l/s per square kilometer of infiltration into the subsoil (with an estimated basin potential of 2 l/s on an annual average)

For the downstream part, based on the report carried out by the SGAI study for the Sacramora site, an estimate of the downstream water balance of the Galvanina site, identified in a portion of the same Marecchia Conoid, is shown below:

1. Basin area: estimated 40 sq km;
2. Average annual rainfall 2023: about 644.6 mm;
3. Total balance sheet value: about 1000 l/s;
4. Share of the recharge due to infiltration: on average 30-40% of precipitation (depending on the type of soil), therefore about between 160 l/s and 210 l/s;
5. Part of the recharge due to the river: about between 790 l/s and 840 l/s.

The site presented a document in relation to the sustainability of the management of the hydrogeological basin of the GALVANINA and FONTESANA MINERAL WATERS USED IN THE GALVANINA BOTTLING PLANT prepared by its geologist consultant. The final conclusion is that regarding the exploitation of the two concessions and the points in reference to its current and future sustainability in relation to climate change:
- the optimal current state of management in QUANTITATIVE and QUALITARY hydrogeological efficiency of the captured water bodies, and TECHNICAL of the capture points, and bottling process,
- SUSTAINABILITY and RATIONAL USE of the intercepted water bodies, IN FULL RESPECT HYDROGEOLOGICAL AND HYDROGEOLOGICAL of the availability of the resources of the feeding hydrogeological basin,
- OPTIMAL VISION to address future climate change, with planning of systematic monitoring within the mineral water mining concessions.

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

Obs.

Comment	From the analysis conducted, it emerges that the hydrographic basin in which the Galvanina plant is located is not influenced by its production activities from the point of view of quality and water availability. From a qualitative point of view, there is compliance as a chemical state with the absence of undesirable contaminating chemical compounds in the bottling water, systematically monitored as part of the process quality procedures. Even in process wastewater in the sewer system, Hera is in complete chemical and environmental discharge compliance. From the point of view of water availability, there is a withdrawal of a conservative resource in compliance with the potential of catchments and the hydrogeological balance. The pumping of the plant does not affect the needs of the upstream or downstream population. As regards the limitation of the downstream basin about the point of discharge into the sewer, it is believed that the influence of Galvanina following the introduction of the wastewater into the sewer is minimal. In the event of a pollutant spillage, it would remain enclosed within the sewage system (closed pipes) and, therefore not in contact with the external environment. Since the wastewater joins other discharges conveyed in the same network, the dilution effect would reduce the possible damage. The wastewater finally flows into the WWTP, which, through primary and secondary treatments, would be able to absorb the potential damage due to the pollutant.	
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	Within the catchment, the infrastructures are managed by the Hera Group as part of the integrated water service. Specifically, there are: • Aqueducts, with a distribution network that mainly supplies inhabited centers. Information on the size of the network in the province of Rimini is not known, but in the Emilia Romagna region, this service covers 227 municipalities serving about 3.4 million inhabitants; • Sewerage, with a network present over most of the territory of the Province of Rimini, whose task is to convey wastewater to the treatment plants in the area. Sewage systems ensure efficient coverage for domestic and industrial wastewater treatment. Also, in this case, the extension of the sewerage network of the Province is not known, but in the Emilia Romagna region, it extends for 19,286 km; • Purification plants, managing several within the province of Rimini. Among the most important is certainly the Ca' Baldacci plant. In the region, Hera manages over 200 purification plants. Hera has launched a strategic project called the "Bathing Protection Plan" (PSBO), together with the local authorities, to improve the quality of bathing water in the province of Rimini and reduce untreated discharges into the sea, which occur mainly during heavy rains. One of the main interventions was the doubling of the Santa Giustina purification plant, located in the hinterland near the Marecchia River. This expansion has made it possible to increase the wastewater treatment capacity, improving the efficiency of the purification system in the area and reducing the risk of discharges into the sea. Another important intervention was the conversion of the Rimini Marecchiese purification plant into a storage tank, which has the function of collecting excess water during periods of heavy rain. This system avoids overloading the sewer network and the purifier itself, reducing the risk of untreated rainwater being discharged into the sea. In terms of drinking water supply and purification services, Hera guarantees complete coverage of the integrated water service for all the municipalities served. In Romagna, however, the water distributed by Hera is purchased wholesale by Romagna Acque - Società delle Fonti: in the Rimini area, the supply is mainly from groundwater. The two main sources of groundwater supply are represented by the Marecchia fan and the Conca fan, where there is also the dam of the same name. In line with the company strategy and with the plans developed by the Emilia-Romagna Region (PTA), Romagna Acque is committed to favoring the use of surface water and to containing groundwater withdrawals, to use at least 70% of surface water on the total water injected. On the purification side, in the specific case of the Galvanina plant, the discharges of industrial wastewater deriving from the production process are conveyed into the black sewer, which is then delivered to the Santa Giustina purification plant (Via Fiumicino 6, Santa Giustina, Rimini). This industrial wastewater is subjected to suitable purification treatment and discharged, in compliance with the legal limits set, into the surface water body "Marecchia River" with downstream flow into the Adriatic Sea. The purification plant, which serves the agglomeration of "Rimini-Valmarecchia-San Marino" with an authorized project potential of 560,000 IE, is constantly manned and subjected to periodic maintenance in compliance with the requirements given in the Authorization Act DET-AMB-2023-3128 of 19/06/2023. ***Finding No: TNR-016569***
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	Yes

Comment For the identification of the infrastructures see here above 1.5.5.

From the analysis of the regional APSFR (Area of Potential Significant Flood Risk) document, defined by the Po River District Basin Authority, the area is particularly vulnerable due to the presence of watercourses (Marecchia River).
The main risk caused in these areas is river floods caused by heavy rainfall and overloading of the hydrographic network in the lower part of the catchment. The hazard maps show greater exposure along the river banks, with a high risk of flooding. The most likely scenarios include flooding of nearby housing and production areas, resulting in risk to the population and significant economic damage.
Risk mitigation can be implemented at the territorial level, identified in:
- Strengthening of river defense works, such as embankments and expansion basins, to limit the impact of floods;
- The implementation of continuous monitoring systems to predict and manage any emergencies promptly;
- The promotion of maintenance interventions of the hydrographic network, to improve the drainage capacity of rainwater and reduce the risk of overflows.

Galvanina delegates to the competent authorities the definition of a mitigation plan coordinated and implementable by companies located in places at risk.

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

in progress

Comment During the inspection of the production plant, the availability of toilets and changing rooms were verified. Divided by gender and in adequate numbers according to the Italian legal requirements (ref. Dogs 81/2008). , the presence of a refreshment area, the availability for all operators of access to the accounted water distributed free of charge.
General WASH data applicable to the area regarding the integrated water service supplier (HERA) are not identified.

Finding No: TNR-016164

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.*

in progress

Comment All challenges have been prioritized with a criterion that takes into account the probability of project realization and the intensity/magnitude of the associated impact.
The scores were assigned by the AWS committee.
The ECOSISTER challenge is a priority to open up the possibility of access to the development of new technologies to be applied in production.
For the challenge of physical protection of the territory of the sources, priority is given to the need to involve private individuals who insist on the buffer zone of the sources.

Finding No: TNR-016573

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

Obs.

Comment The sustainability practices suggested by the participation in the ECOSISTER – OIS Open Innovation scouting project can improve the corporate image and meet consumer and regulatory expectations, promoting long-term growth. The operational opportunity will be identified based on the technical meetings that are planned in the coming months. The initiatives that have been implemented to date are the participation in conferences and technical meetings for the definition of the projects.

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 completed the stakeholder table with an evaluation of what may be associated with one or more risks related to water management. (column q to v) Each risk is assessed based on the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it. The two indicators are combined using a product to assess the resulting significance of the risk (Significance = Probability x Magnitude).

As a sample, one of the major identified risks is the Lack of transparency of suppliers to Galvanina's requests and non-adherence to the code of conduct with the Impossibility of improving the water footprint and the creation of a breach of trust between Galvanina and suppliers. Suppliers are companies from which Galvanina purchases the raw materials and packaging for the production of its products. Not everyone is sensitive to the issue of sustainability, but Galvanina can use the commercial relationship as a lever to ask for collaboration in the management of water resources in the supply chain.

Finding No: TNR-016166

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

Applying the same methodology used for the risk, The site completed the stakeholder table with an evaluation of what may be associated with one or more opportunities related to water management. (column q to v) Each opportunity is assessed on the basis of the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it. The two indicators are combined using a product to assess the resulting significance of the opportunity (Significance = Probability x Magnitude).

As an example, related to the points above described: - participation in the ECOSISTER Project has been assessed as a significant opportunity to collaborate on research projects and strategies that promote sustainability and resource management. - Access to research funds - By implementing best practices in water resource management and sustainability, thanks to PWC"s vast experience and knowledge, the company's image could improve and meet consumer and regulatory expectations, promoting long-term growth. However, integrating PWC's recommendations into existing business processes may require additional time, costs, and resources.

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.*

Yes

Comment

For AWS purposes according to the corporate level in the "Best Practices" section, the following best practices are considered for this site:

- The European BAT 1 is applicable; however, it has already been implemented through the implementation of the ISO 14001 EMS. This environmental management system has already been adopted by Galvanina and is maintained annually.
- Effective participation in the ECOSISTER project of the University of Parma for the application of BAT in private companies aimed at protecting the climate and natural resources

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

Yes

Comment	For AWS purposes and based on the corporate level in the "Best Practices" section, the following best practices are considered for this site: • The European BAT 2 is applicable, already implemented through the water balance provided for by the same AWS certification and the related improvement plans; The best practice relating to the preparation of a system for the automatic download of data from the instantaneous reading of the various water sensors already present in the company, with the creation of a virtual archive, is applicable. This system will allow you to have control over historical data and to reason about potential variations in water flows over time, as well as create forecast models based on environmental parameters such as temperature, expected rainfall, etc. All the new instrumentations have been ordered from the producer and will be delivered for installation in 2025 Q2. • The European BAT 7 is applicable, and already implemented where possible: double-button drains have been installed in the bathrooms and the cleaning cycles of the systems have been optimized over time.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	✓ Yes
Comment	The following best practices are considered for this site: The European BAT 3 and BAT 4 are applicable, already substantially implemented as they have been merged into the Italian legal system and therefore applied by the company through the requirements of the AUA. The possibility of intensifying the frequency of monitoring will be evaluated within the AWS system in the future years.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	✓ Yes
Comment	The following best practices are considered for this site: The best practice relating to the request for collaboration of private individuals who insist on the areas of respect for wells and springs is applicable, to be able to enforce the constraints imposed, for example, the prohibition of carrying out some activities that are potential sources of ground pollution. Identification of best practices on other IWRA will be checked at surveillance.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	✓ Yes
Comment	The following best practices are considered for this site: The best practice regarding the addition of non-mandatory sanitization points is applicable. Galvanina has installed columns for the dispensing of sanitizing gel in all the different production departments and offices to minimize the risk of contamination through hand contact.	

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	Galvanina management drafts, signs, and publishes a Policy for the three sites for the management of water resources, containing the following statement: - that each site implements and disseminates progress on water management programs aimed at achieving tangible improvements; - that the implementation of each site is aligned with and in support of the existing basin sustainability plans; - that the stakeholders of each site are involved openly and transparently; - that each site allocates the resources necessary to implement the Standard. The Policy is available on the website.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	✓ Yes
Comment	The organization identified the CEO as the person responsible for environmental legal compliance, and the HSE manager as the operational manager for managing all consequent obligations and managing relationships with control bodies. The HSE manager prepared a schedule with all the obligations and related deadlines to monitor the actual fulfillment of the legal requirements.	
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	Based on all the data and information with particular reference to the shared challenges, opportunities, and risks identified, Galvanina defined its mission, vision, and concrete objectives to improve the management of the water resource under its jurisdiction. The company management then draws up a Water Stewardship Strategy, which serves as a reference for the subsequent development of an action plan.	

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.

in progress

Comment

The action plan, named d the "Water Stewardship Plan" (hereinafter "the plan"), is created by RAWS (responsible for the AWS system) and shared with the Management of Galvanina.
For each objective, actions are defined so that their completion leads to the achievement of the set objective and contributes, in general, to improving the management of water resources.
The objectives and actions are defined, but not exclusively, on those for whom the required involvement was "Moderate" or "Advanced".
For each action in the plan, the estimated budget for the completion of the action is defined (which may include fixed personnel costs or variable costs for the purchase of material or external consultancy), as well as an expected closing date. These values are not considered definitive and may be modified if there are unbudgeted costs or the need for different timing.
For the first year of AWS system at a site, the plan is proposed by RAWS at the same time as the first issue of the Handbook. For monitoring and any changes in progress (e.g., on costs and times), as well as for updating the plan in subsequent years, the responsibility is delegated to the entire Water Team.
The completion of each specific action is monitored through the creation of a KPI (Key Performance Indicator), created ad hoc. It is the responsibility of RAWS to define the successful completion of the actions.

Finding No: TNR-015287

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

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

Yes

Comment

For the identified risks, the action plans are defined.
With reference to the top risk identified in § 1.7.1 about the study of the water footprint, the following actions were defined and managed with the AWS Plan:
VAL_3, : Collaboration in the FOOD HUB project to find innovative solutions for the correct management of water resources. The project (started with the first certification of the Val di Medi site is abandoned for the moment.)
VAL_4 : 4_setting of relationships with primary packaging suppliers to define a plan for the reduction of water consumption – the project is on going.
WF_1: 1_preparation of questionnaires to primary packaging suppliers to increase the level of accuracy of the data in order to lower the coefficient of variation in the calculation of the plant's Water Footprint. The first part of the activity is completed and the Water Footprint is updated with primary data from primary packaging suppliers

The Company Business continuity plan will be considered for surveillance 1 audit.

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

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

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

Comment: The site made efforts to start active engagement with governance initiatives in collaboration with local authorities such as:
- Emilia Romagna Region: General Directorate of Territory and Environment: Soil Protection Sector. Geology, Soil and Seismic Area. The first communication was on September 27th followed by a series of exchanges of technical information with the geologist Forastieri SGAI which allowed the preparation of the hydrogeological report document of the site.
- Start collaboration with the ECOSISTER working group – Emilia Romagna Region (meetings on 13 and 26 November) for the identification of the best available technologies and university collaboration for the identification of the best available technologies in terms of optimizing the use of resources.

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 other than those captured by legal and regulatory requirements can be identified. The mining concession's exploitation activities do not limit the rights of others on the use of water at the sources since the concession is granted only after the granting public body has carried out all the necessary checks on the availability and invariance of the resource.

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.* ✓ Yes

Comment: The site has produced the internal control checklist M 4.3 A, which has the aim of verifying, in detail and on all applicable topics, compliance with legislative compliance in the environmental field. Even taking into account the AWS requirement, as regards the part relating to water, the verification was carried out on 100% of the applicable requirements. Furthermore, within the scope of the ISO 14001 certification that the site manages under certification by an accredited third party, this checklist has been verified as consistent and correct within the scope of the annual certification audit.

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 local public integrated water service HERA is responsible for maintaining control over the legal compliance of the water distributed, collected as waste, and subsequently discharged downstream of the WWTP.
This respect can be found within public service documents.
The analyses of the potability of the distributed water are available on the municipal website and the evaluations on the proper functioning of the system are available in the ARPAER (Emilia environmental control body) report.

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.*	in progress
Comment	The evaluation of progress towards meeting water targets will be possible only after the definition of the targets (see the findings in the previous points). ***Finding No: TNR-016169***	
3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Yes
Comment	Water scarcity is not a water challenge applicable to the site.	
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 point is not applicable to the site.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes
Comment	Water quality is regulated by legal requirements: The incoming water has the characteristics of mineral water that do not depend on the company's activity. The authorization for wells and springs is based on the maintenance of the characteristics of this mineral water. The outgoing industrial water is regulated by a specific AUA authorization that defines the qualitative and quantitative parameters for the discharge. The quality limits are always respected. The site annually verifies the discharge water quality within the authorization limits with analyses carried out by an accredited laboratory.	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	Water quality is not a shared water challenge in terms of continual improvement. The plant effluent is always legally compliant. The site discharge goes to a sewer connecting the site to the municipal WWTP, which is a plant of 500K equivalent inhabitants (domestic and industrial), and its total flow and outlet water characteristics are not influenced by the site. Also, the final receiving water body is not directly influenced by the site discharge.	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	
3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	Yes
Comment	The AWS plan includes one action related to IWRA: To monitor the good condition of the water at the source / well, an activity involving the (private) owners present in the buffer zones has been started. The aim is to sensitize third parties to respect the rules that help to maintain the safeguarded areas.	
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	During the inspection of the production plant, the availability of toilets and changing rooms were verified. Divided by gender and in adequate numbers according to the Italian legal requirements (ref. Dogs 81/2008). Water bottles are distributed to all employees, and a drinking water supply point was made available, with free recharge from sanitized containers provided by a specialized supplier.	
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	Yes
Comment	The site's activity does not influence the availability of water for local populations.	
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.*	Obs.
Comment	No suppliers of primary inputs or outsourced services are identified within the catchment The embedded water indicator is not considered in the AWS system.	
3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	There are no indirect water uses within the catchment,	
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.*	in progress
Comment	The infrastructures identified above as shared with external parties (drinking water inlet aqueduct and sewerage network between the plant and the WWTP) are managed by third parties (HERA) and the risk and opportunity analysis has not identified any common challenges to share. The commitment to comply with the legal obligations associated with the authorization remains. Communications in this regard are periodically made (communication of water sampling; and analysis of water discharged into the sewer). The site have planned to engage the owners (HERA) about any concerns regarding the catchment infrastructures before the first surveillance audit. ***Finding No: TNR-016382***	
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 AWS site representative participated in the kickoff meetings of the ECOSISTER project. The agenda of events of 22-10-24; 13-11; 26-11 and 03-12. was provided.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes

Comment	The best practice BAT 2 is related to the preparation of a system for the automatic download of data from the instantaneous reading of the various water sensors already present in the company, with the creation of a virtual archive, is applicable. This system will allow the site to have control over historical data and evaluate potential variations in water flows over time, as well as create forecast models based on environmental parameters such as temperature, expected rainfall, etc.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	the site did not define any action on this indicator, as the quality of the inlet/outlet waters is strongly regulated by law.	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes
Comment	Following the acquisition of data relating to the information obtained from the owners within the buffer zones and the evaluation of the data a master plan for activities will be implemented, followed by an on-site audit to verify the actual situation in the field.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	The presence of sanitizer dispensers is kept active even following the cessation of obligation for pandemic management.	

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.*

in progress

Comment

The Water Team has the task of carrying out periodic checks, with the aim of monitoring the progress of the actions planned to achieve the objectives and, if necessary, implementing corrective actions.
The Water Team also has the task of annually reviewing the entire system, with the aim of:
- analyze the results of the actions carried out in response to the objectives set out in the plan and the degree to which they have been achieved, as well as assess the effectiveness of any corrective actions taken;
- Assess the adequacy of AWS system documentation, staff skills, and operating procedures;
- check the validity of EMS and H&SMS certifications as a guarantee of legislative compliance;
- update stakeholder mapping, shared challenges, risks and opportunities, objectives to be achieved in the following year, and related action plans;
- update or confirm the Policy;
- establish system trends as communication.

The frequency of Water Team meetings for each calendar year is: :
Q1 first periodic check
Q2 second periodic check
Annual review

The first Water Tram annual review held on December 10 contained the following evaluations:

Objectives completed:
RESP1_ training events for new employees and refresher courses for existing ones, on AWS and its founding principles:. almost completed
RESP2_Distribution of water bottles to all employees: almost completed
WF1_Delivery of questionnaires to primary packaging suppliers to increase the level of accuracy of the data in order to lower the coefficient of variation in the calculation of the plant's Water Footprint; a response was received from the supplier and the primary data on water consumption provided by the supplier were reprocessed into the calculation model, The same was found to be less impactful than the benchmark.
BAT4_Partecipation is effective for the ECOSISTER project of the University of Parma for the application of BAT in private companies aimed at protecting the climate and natural resources:. The final event for presenting the results of the program's first edition and a summary of the best projects launched is scheduled for February 28, 2025.

The following objectives have only been partially achieved:
VAL5_inspections in the Buffer Zones provided for by the mining concession in correspondence with private areas by the feedback received with the questionnaire,
MON4_ Installation of rain gauge for the timely monitoring of inputs deriving from Rimini's atmospheric precipitation:
MON5_ Improve the water sustainability studies by the company consultant SGAI of the basin by collaborating with the competent bodies in the Emilia-Romagna Region,
BAT2_ Installation of the water data system.

Finding No: TNR-016173

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

Yes

Comment	The first Water Tram annual review held on December 10 contained the evaluations of the value related to the objectives achieved on the Water Stewardship Plan. For example: the value was evaluated with a questionnaire recently submitted showing that the internal training to employees on the certification was positively accepted; certification has significantly improved collaboration with suppliers and other external stakeholders about water sustainability for 80% of respondents, AWS certification has generated internal value for the company, for 70% certification has significantly improved water management processes and increased internal awareness on the importance of sustainability.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Obs.
Comment	The first Water Tram annual review held on December 10 did not evaluate the benefit related to the objectives achieved on the Water Stewardship Plan, as they were not clearly defined and shared.	
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	There were no environmental emergencies related to water management at the site in the previous year.	
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.*	in progress
Comment	Communication with stakeholders on the site stewardship performances is still to be defined. ***Finding No: TNR-015295***	
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 first Water Tram annual review held on December 10 contained the following evaluation: - The AWS certification was initially implemented only in the Val di Meti plant. The experience gained in managing the system for a year was transferred as a value on which to implement the system and also in the other two plants in Rimini. Also, in the future, there will be the opportunity to exchange experiences and evaluations of the system between the three plants in order to share lessons learned and the experiences gained. - The AWS system documentation is currently adequate; however, it appears necessary to increase proactive stakeholder involvement activities in order to identify problems or opportunities for improvement related to water resources to which Galvanina can actively contribute. - The General Site improvement plan contains the annual objectives linked above all to the production process, and, among these, there are efficiency objectives to minimize production waste and consequently lead to less waste of water resources. In January 2025, Quality will review the objectives during the annual review and propose to adopt the relevant objectives for the AWS system as well. This will be followed by an update by the Water Team and approval of the Water Stewardship Plan for the year 2025.

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

Galvanina decided to create a group of people within the company to coordinate the entire water resource management system.
This group of people was identified by the Management and called the "Water Team". The same was formally constituted with a special meeting, called by the Management.
The Water Team is composed of:
- the AWS System Manager (RAWS, the person who holds the role of Sustainability Manager) and the EHS Manager.
o The Site plant manager;
o Extra variable: composed of one or more people who are competent in one of the aspects required by AWS.

In the chart, it is indicated that the EHS position is accountable for compliance with water-related laws and regulations.
The organizational charts are made available within the Galvanina SharePoint intranet.

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

All the actions implemented in the AWS management system that Galvanina has implemented or will implement over time are subject to communication and dissemination to the identified stakeholders, in different ways.
Internal communication actions are aimed only at internal stakeholders (those who belong to the organization and have a direct economic relationship with it, i.e. Galvanina's top management, employees, and ownership) and consist of disseminating both information and notions on the functioning of the AWS system, and periodic and timely updates on the decisions taken by the Water Team. The tools suitable for this purpose are, by way of example but not limited to: internal training/information events, posting of information on physical bulletin boards, uploading documents to the company Intranet, steering committee meetings, sending emails, including the AWS plan.

External communication actions will mainly be aimed at external stakeholders, with a focus on the challenges of the territory and compliance with current regulations; This also includes disclosure of information about the site's governance of water, including the positions of those responsible for legal compliance with water (see ISO 14001). The tools suitable for this purpose will be, by way of example but not limited to: uploading information on the web page and/or social networks, sending/publishing the sustainability report, sending emails, and events such as public conferences or webinars organized by Galvanina or other public or private organizations (public bodies, universities, trade associations, etc.).

Finding No: TNR-015297

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	Galvanina commits to communicating the water management plan to stakeholders and to disclose the annual summary of the site's water management, including relevant information on the site's yearly water management performance and results against the site's objectives. It also commits to disseminate the efforts made to collectively address shared water challenges, including associated efforts to address the challenges, engagement with stakeholders, and coordination with public sector bodies. The person responsible for the communication is the RAWS.	
	Finding No: TNR-015299	
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	The results obtained regarding the AWS plan will be included in a chapter of the Sustainability Report, which is due to be issued in April 2025. See 5.3.1	
	Finding No: TNR-016174	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	Galvanina is proceeding with the identification and involvement of stakeholders, and the action is still ongoing (see also the finding highlighted above). The engagement activities are differentiated by stakeholder, such as: Emilia Romagna region: hydrogeological technical office: communications aimed at obtaining hydrogeological data of the catchment ECOSISTER: meetings to define projects of common interest and collaboration;	
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	With a policy of complete transparency in terms of environmental compliance, Galvanina, through RAWS, will make available on request the details of any violations of the site's water compliance and the corrective actions taken to prevent them from occurring in the future. The legal management of violations refers to the procedures in the ISO 14001 system.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The site will take actions to address the causes of the violation if any, to prevent future occurrences of similar violations. This 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

7 tubazione.jpg

6 fonte storica.jpg

8 Fontanella.jpg

9 schema gallerie .jpeg

Previous Findings	
All non-conformities raised in the previous audit have been satisfactorily closed.	N/A