CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001384

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Sanpellegrino S.p.A stabilimento San Giorgio in Bosco**
Address: Via Valsugana 5, 35010, San Giorgio in Bosco -PD, ITALY
Contact Person: Angela Midollini
AWS Reference Number: AWS-000668
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-May-08
Validity of certificate: 2028-May-07

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Feb-04
Audit End Date: 2025-Feb-06
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Enrico Freschi, Lead Auditor
Josè Manuel Gonzales, Observer

Site Participants:
Stefano Piscitelli, Site manager
Carmelo Fichera, SHE Manager
Paolo Zonta, Site source manager
Ludovico Calone, Source Manager
Mirco Nardo, Engineering Manager
Marco Pavan, Production manager
Marco Perin, Supply chain and Logistcs Manager
Andrea Levorato, Operations Finance Controller
Lorenzo MAgnago, Manager - Human Resource
Anna Farinazzo, Quality Manager
Pietro Adamo, Hydrogeologist
Riccardo Giusti, Site hydrogeologist
Fabia Ruggeri, Corporate Sustainability
Angela Midollini, Group AWS coordinator

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 major non-conformity, 6 minor non-conformities, and 7 observations were raised.

The client is requested to perform the root causes analysis and define corrective actions for the non-conformity and to submit this to WSAS within 30 days of receipt of the audit report by 09 May 2025.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within75 days) by 23 June 2025.

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

The audit team recommends certification of Sanpellegrino Spa - site of San Giorgio in Bosco at Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformity.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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Scope of Assessment: The scope of services covers the initial audit for assessing the conformity of Sanpellegrino S.p.A. - Site San Giorgio in Bosco (shortened as SGIB site) against the AWS International Water Stewardship Standard Version 2.
The Sanpellegrino S.p.A. - Site San Giorgio in Bosco within the Sanpellegrino organization covers the production of Acqua Vera (mineralized water extracted and bottled for one client owner of the brand which cover the distribution and sale of the product), and the production of soft drinks on its proper name. A department is also focused on the production of the pre-formed plastic bottles used on the other Sanpellegrino sites.

The plant is located in the municipality of San Giorgio in Bosco (3 km) while some wells are in the municipality of Cittadella (10km) in the province of Padua (30km) – Veneto region. The site is located at an altitude of about 30 m above sea level and is classified as low seismicity.
The plant is not located in an industrial area; it is located north of the center of the municipality and is surrounded on three sides mainly by meadows. On the fourth side (facing the main road named Valsugana), there are other companies.

The Sanpellegrino Plant and the municipality of San Giorgio in Bosco are not included in Natura 2000 protected areas.

The only watercourses that affect the municipality of San Giorgio in Bosco are the Brenta River and the Tergola stream; both are far from the plant.
At a geolithological level, the main lithotypes that affect the Municipality of San Giorgio in Bosco are deposits of limestone, clayey limestone, and marl.

The onsite site visit included the assessment of the production of bottled water and soft drink, of the main department of the site, of the water related area such as wells, the waste water treatment plan, the site waste and rain water discharge points to the external receivers, the wells located inside the site or in a nearby agricultural field,

The audit was conducted onsite on 4,5,6 February 2025.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	6
Major	1

FINDING DETAILS

Finding No:	TNR-016579
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:	Tthe site prepared a map with the indication of the wells, but the description of the hydrogeological protection areas needs to be improved.
Corrective action:	Asked to Veneto region Protect areas for our wells

Finding No:	TNR-017607
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2025-Jul-08
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:	Although the catchment (Brenta Bacchiglione (ITN003)) is named, a clear map with the catchment's boundaries and location of the site and the sub-catchment in the catchment, were not provided. As this is a cornerstone of water stewardship, it needs to be addressed prior to certification.
Corrective action:	please find attached new map with all the info required
Evidence of implementation:	please find attached files

Finding No:	TNR-016542
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site did not consider as Stakeholders: the Indigenous people living in the neighbohood of the site; the small business and agricultural sites located near the factory; the third parties related to the agricultural fields where the receiving creeks flow after receiving the site water discharges.
Corrective action:	we will update our SH list also including neighborhood

Finding No:	TNR-016580
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The correct management of waters produced during emergency activities, such as chemical spillage/firefighting, in terms of pollution content and flow at the discharge points, is not considered in the emergency response procedure.
Corrective action:	we will create a specific procedure to manage water produced during emergency activities

Finding No:	TNR-016903
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	The plant discharges its wastewater and rainwater into two creeks, which flow directly into the main River Brenta after a few kilometers. The water quality of the receiving body, the River Brenta, has not been quantified.
Corrective action:	The plant discharges its wastewater and rainwater into two canals, which flow into the main River Brenta after a few kilometers. The water quality of the receiving body, the River Brenta, has been quantified in the Catchement Water Quality Report. Please see attached file.

Finding No:	TNR-016902
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The unloading of WWTP chemicals from the transport tank takes place in a non-segregated area, where the truck is parked. In the event of an emergency spill, the chemicals would flow directly into a rain sewer that discharges into an external creek. The potential risk of external pollution in such a scenario was not considered.
Corrective action:	All the water coming from "chemical truck unloading area "will be collected and pump to the WWTP in order to completely eliminate the risk that this water contaminate stormwater (it will be collect & treat as industrial water and no more as storm water)

Finding No:	TNR-016549
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The site identified relevant water governance policies, plans, frameworks, and institutions that affect the site, but there is no evidence of the effort to acquire information on public water governance initiatives and summarize the requirements and expectations from the external to demonstrate how the understanding of those initiatives affects the site.
Corrective action:	These evidences was already uploaded in WSAS portal before the audit: you can find it under section 5.3.1 e 5.4.1

Finding No:	TNR-016576
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site has not identified existing or planned water-related infrastructure within the catchment, including its condition and potential exposure to extreme events.
Corrective action:	we will perform an hydrological balance of the two little drains close to the factory in order to better understand their capacity during extreme events, moreover we asked to our hydrogeological expert to perform a study on existing or planned water-related infrastructure within the entire catchment area, including its condition and any potential exposure to extreme events in order to understand the full impact on the entire system.

Finding No:	TNR-017551
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	It was not immediately clear whether the actions exceeded legislative requirements, which is necessary for them to be considered best practice. Compliance with legal standards alone does not constitute best practice.
Corrective action:	For next audit we will highlight the action/analyses exceeded legislative requirements

Finding No:	TNR-017557
Checklist Item No:	3.7.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Some internal site services, such as general cleaning, waste collection, removal, storage, and final disposal, as well as internal and external floor cleaning (both dry and wet), are provided by a supplier ("Cooperativa"). However, there is no evidence of its direct engagement with the site in good water management practices.
Corrective action:	We will organize for all internal site services a training on good water management

Finding No:	TNR-017570
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	It is not evident that the site has taken any actions that go beyond simply meeting legislative requirements in relation to water quality. Compliance with legal standards alone does not constitute best practice.
Corrective action:	We will better highlight the analyses/action exceed legal requirements

Finding No:	TNR-017571
Checklist Item No:	3.9.5
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	While the site meets the SHE requirements, best practices related to setting and implementing WASH targets, as outlined in the AWS indicator requirements, were not clearly articulated or demonstrated.
Corrective action:	we will highlight all action/analyses that exceed WASH legal requirement

Finding No:	TNR-017579
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
Findings:	Although the site uses the CRP 3.0 tool for stakeholder engagement, the evaluation of stakeholder consultation feedback—particularly regarding the site’s water stewardship performance and the effectiveness of its engagement process—was not clearly articulated.
Corrective action:	As you can see from the documents uploaded on WSAS portal, we had the evidence of stakeholder engagement and feedback

Finding No:	TNR-017581
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site's water-related challenges and the measures taken to address them had not been disclosed at the time of the audit but were scheduled for future disclosure.
Corrective action:	Just before the audit we had organized a meeting with SH in order to define and share water challenges, please see evidence uploaded on WSAS portal

Report Details

Report	Value
Report prepared by	Carlo Enrico Freschi
Report approved by	Ruth Wandera
Report approved on (Date)	08/04/2025

Surveillance

Proposed date for next audit
2026-Feb-04

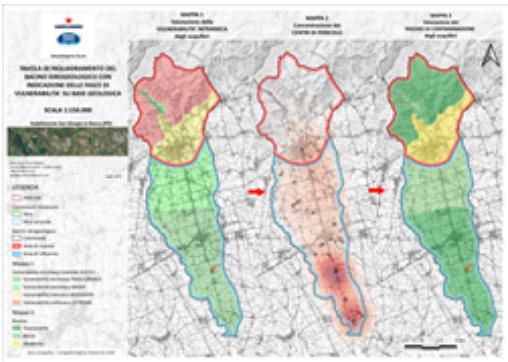
Stakeholder Announcements

Date of publication	Location
	Finding No: TNR-016375
03/12/2024	Public community Center - San Giorgio in Bosco
03/12/2024	Sanpellegrino Corporate website: https://www.sanpellegrino-corporate.it/it/valori
05/06/2024	AWS website: https://a4ws.org/wp-content/uploads/2024/12/AWS-000668_Nestle-Waters-San-Giorgio-in-Bosco_StakeholderAnnouncement_V3.0.pdf

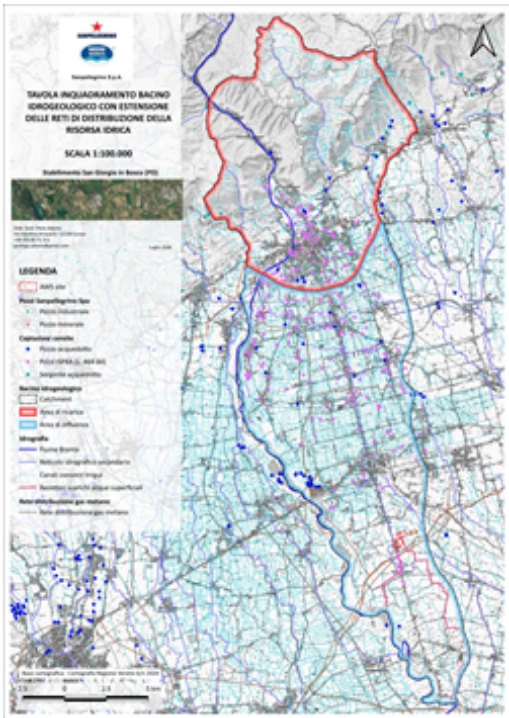
Comment: The announcement was published on the AWS website, on the company website, and on a public communication panel in the San Giorgio in Bosco Community Center.
The publication has been verified during the audit.
The Lead Auditor received no request for information or complaint before the audit.

Catchment Information

6 TAVOLA AREE PROTEZIONE POZZI GENERALE_Rev_page-0001.jpg

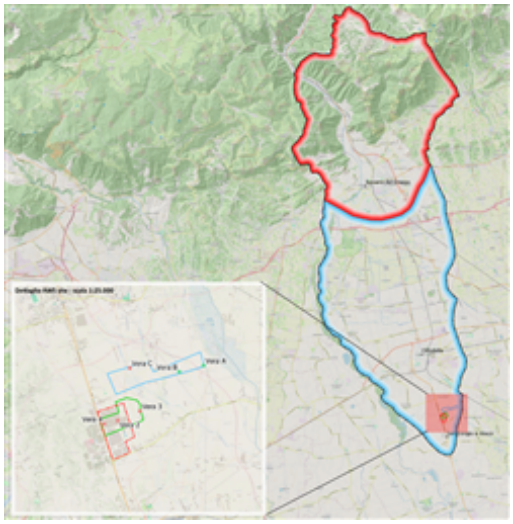


5 TAVOLA VULNERABILITA'_Rev.01_page-0001.jpg

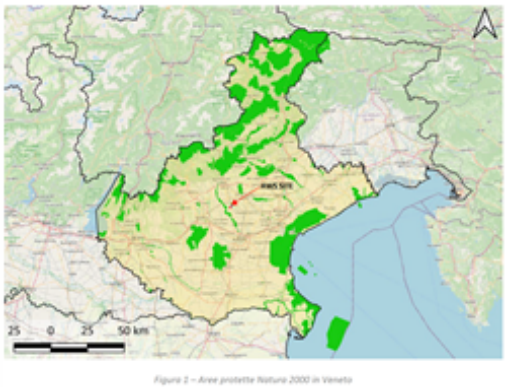


4 TAVOLA DELLE RISORSE IDRICHE NEL CATCHMENT_Rev.01_page-0001.jpg

8 TAVOLA CONDOTTE DI ADDUZIONE_Rev.01_page-0001.jpg



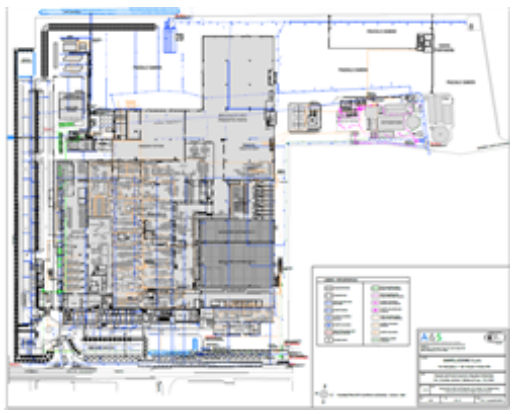
1 subcatchment.png



3 Natura 2000 IWRA.png

2 infografica.jpg

0 CATCHMENT_page-0001.jpg



9 rainwater collection system.png

1 1 TAVOLA BACINO IDROGEOLOGICO_Rev.01_page-0001.jpg

12 TAVOLA BOSCO LIMITE_Rev.01_page-0001.jpg

11 TAVOLA IWRA_Rev_page-0001.jpg

10 WWTP.png

Catchment Information

The name of the catchment is Brenta Bacchiglione (ITN003) – The sub-catchment is San Giorgio in Bosco - Cittadella

The Brenta-Bacchiglione basin (about 5,700 km² of surface) is the result of the union of the hydrographic basins of the Brenta, Bacchiglione, and Gorzone rivers. These rivers, characterized by interdependence and interconnection, reach the sea through a single mouth.
The Brenta river originates in Trentino from Lake Caldonazzo and in its intricate course subtracts and yields flows, often even considerable, to numerous canals and irrigation ditches. Its main tributaries are the Cismon and the Muson dei Sassi.
The Bacchiglione River is a very complex hydrographic system composed of watercourses that drain from foothill basins and resurgence streams. It crosses Vicenza, Padua, and Venice and finally flows into the Brenta near Chioggia.
The Gorzone River was born as Fratta, taking its first waters from a small stream to which are added the water contributions in the hilly area between Costo di Arzignano and Trezze to finally bend up to the mouth near that of the Bacchiglione.
Within the main catchment, there is a part (sub-catchment) that has a direct correlation with the site and the areas subject to the mining concessions for the extraction of mineral water. This area is characterized by two parts:
• Recharge Area (catchment of origin): which includes the primary water infiltration area or recharge area. It extends from Bassano del Grappa to the Venetian Prealps, up to an altitude of 1300 - 1400 meters a.s.l., as indicated by isotopic evaluations. The Supply area has an area of 136.96 Km2. By feeding area is that area of the Veneto Pre-Alps where the infiltration of liquid and solid precipitation takes place, which is captured by the fracturing systems of the Monte Grappa area. These waters, based on what is reported by isotopic investigations, feed the deep aquifers captured in San Giorgio in Bosco. To these waters are added those coming from the apical part of the alluvial fan of the Brenta, in which the aquifer is undifferentiated.

• Influence Area: which contains the Sanpellegrino S.p.A. wells and mineral concessions area. This is the area through which waters move from the recharge area to the wells zone without connection with the surface. The Influence Area in the plain area is bounded to the west by the Brenta River, to the east it is delimited by the boundaries of the hydrographic basins that drain eastwards towards Castelfranco Veneto and they are not connected to the aquifers of interest. The Area of influence has an extension of 152.22 Km2. The area is the sector in which there is no direct interconnection between the surface and the deep groundwater. At depth, the water is captured through the wells in the site mining concessions.
The surface water bodies present in the basin area do not directly affect the deep aquifers, but rather the upper aquifer.
These elements are mainly the Brenta River and the network of irrigation canals managed by the Land Reclamation Consortia, which derive surface water directly from the Brenta and distribute it throughout the territory, providing most of the water needs of the agricultural and also industrial sectors.
In this area, the balance of the local water resource is evaluated, detailing according to the uses, based on the knowledge acquired through research at the bodies in charge and distributors of the water resource.
The interactions with stakeholders are mainly located in this area of influence.

Downflow area: the Sanpellegrino site has two water outlets: in front in the creek FOSSO DI GUARDIA S.P.47 (a main road lateral service creek) and in the back in the creek Roggia Chioro (an agricultural secondary creek).
After a few kilometers both creeks join the Brenta River: due to their very reduced flow, the influence of the two creeks on the main river is negligible, and thus the sub-catchment ends.

Client Description and Site Details

Client/Site Background

The San Giorgio in Bosco (SGIB) plant is an operating unit of the Sanpellegrino Group that has as its object the production of PET preforms, the bottling of mineral water, and the production and bottling of soft drinks of the group's brands.
The company was founded at the dawn of the century as a sole proprietorship operating in the distillation of grappa as well as the production of liqueurs, wines, and carbonated waters.
The company was purchased in the early 50s by the Vera brand.
Vera mineral water began to be bottled in 1979, having obtained the necessary authorizations after a few years of sampling and analysis. Hydrogeological research had led to the location, in the mountains north of Bassano del Grappa, of a vast underground aquifer of mineral water. This aquifer collects the waters of the snowfields of the Brenta and Valsugana Dolomite group, filtered through layers of sand and rocky debris that give them various mineral components.
The company transformed into a joint-stock company in 1980 with the name "So.Ge.A.M. – Società Gestione Acque Minerali S.p.A." began its take-off in 1982, the year in which the production with PET containers began among the first companies in the sector.
In 1993 Perrier acquired the majority stake in the company and in 1994, following the purchase of Perrier by Nestlé, it became part of the Nestlé Group.
In 1997 Perrier also acquired the majority of the Sanpellegrino group, present in Italy with several operating units.
On 1 January 1999 Acqua Vera S.p.A. was absorbed by Sanpellegrino S.p.A. and became part of an Italian group with numerous production plants scattered throughout the country.
Production is carried out inside numerous warehouses made up of prefabricated concrete elements with a covered area of about 50,000 square meters, inside which the process plants are arranged.
The adjacent building is home to the technical and administrative offices, as well as the analysis laboratories dedicated to the quality control of raw materials and finished products, of the entire Nestlé group.
As of 1 December 2021, Sanpellegrino S.p.A has sold the Aqua Vera brand and the two associated factories (S. Rosalia in Sicily and Fonte Naturae in Castrocielo) to a company already operating in the S. sector that takes care of marketing and sales.

The site is located in a moderately anthropized environment in a typical high-medium plain, covered by crops, forest, and swamp and crossed by river Brenta streams and by a rich network of artificial creeks.
The plant and the municipality of San Giorgio in Bosco are not included in environmental protected areas.

The water supply is provided by pumping from 4 active wells (2, 3, 4, and C) for mineral water, and two active wells (A and B) for industrial (soft drinks and plan utilities) and drinking water (for human use). There is a fifth well (called a fire pit) that is currently not used as the authorization protocol has not yet been activated. Two wells are inside the perimeter of the plant, while the rest are outside in a nearby agricultural field.

The wells outside the perimeter of the plant are included in the site object of the AWS system as well as the pipes connecting the wells and the site. The wells have a buffer area of approx 20 by 20 meters and are fenced with a net equipped with barbed wire and access gates; inside the well, security is guaranteed by motion sensors connected to a telephone alarm. The rooms of the masonry wellhead have a reinforced concrete roof and are closed with armored doors with opening sensors.
The wells are monitored daily by internal staff.

The water is transported to the plant with underground steel pipes that are also part of the AWS site. The water from the wells is used for all the needs of the plant: bottling, industrial, and civil users. The pumped water separated from mineral and industrial is collected in external tanks and distributed through two rings that feed the production lines (bottled water under the Vera brand) and a line (industrial water) for soft drinks, the syrup room, utilities, services, and offices.

The farm is equipped with a biological purification plant that collects and treats the

company's wastewater, in particular:
- bottle rinse water (containing traces of hydrogen peroxide or peracetic acid)
- drinks consisting of water, juices, sugars/sweeteners and flavorings
- aqueous solutions of detergents and sanitizers for cleaning systems
- domestic drains (showers, canteen, toilets)
- first rainwater of some areas such as waste pitch.

The purified water is discharged as surface water in a creek managed by Veneto Strade through an underground pipeline equipped with a sampling point..
The creek is a derivation fed by the "Roggia Brentella" and rejoins the Roggia near the village of San Giorgio in Bosco; the final receiver of the Roggia Brentella is the Brenta River.
In addition, there are two collection open pitches for the first rainwater, one serving the ecological area, the other serving the truck loading yard.
The overflow water is discharged into the Roggia Chioro (different from the one into which the purifier discharges) with the authorization of the Brenta consortium.

Comment

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site provided a list of shared water challenges that it has identified in consultation with its stakeholders. The challenges are also prioritized according to the application of defined criteria. The main water challenges are:

Climate Change / Extreme Weather Events – Hydrogeological Instability. : the challenge is to put in place actions to reduce a possible flooding in case of heavy rains due to poor maintenance of the receiving water collection channels. This is shared with Veneto strade and Consorzio di bonifica e delle risorgive.

Lack of knowledge of the basin and water resource : Demonstrate that the surface aquifer is not connected with the deep mineral aquifer. This is shared with Veneto Region and Consorzio di bonifica e delle risorgive.

Water as a limited resource: the need to optimize consumption : reduction of site water consumption per unit of final product to reduce the impact on the local water availability. Shared with the Municipality of San Giorgio in Bosco.
Lack of knowledge of the impact of the plant Engagement and education of new generations: social engagement of the site with local school on education on water saving and site open meeting with local population.

Participation in Water Resources Governance: difficulties in water management and/or access to it . Improvement of the distribution and quality of water to the local population. This is shared with the Municipality of San Giorgio in Bosco.

Impact of human activities on catchment: Technical Tables for the implementation of regional and local measures for the protection of aquifers. This is shared with Municipality of i San Giorgio in Bosco , Municipality of Cittadella, Regione Veneto, Consorzio di Bonifica Brenta, ETRA.

Impact of climate change on the Resurgence Belt and the Brenta River: Tutela della Fascia delle Risorgive e miglormaneto accessibilità Palude di Onara. This is shared with Ente PArco Brenta and municipality of Tombolo.

0.1	General Requirements for Single Sites, Multi-Sites and Groups

0.1.1

0.1.2

0.1.2.1 Yes

Comment: During the audit, the following parts of the site were visited by the auditor:
the internal production lines of mineral water and soft drinks;
the warehouses of raw materials, chemicals, and flavours;
in the external areas: the cooling towers and the civil and industrial water treatment plant; the rainwater lifting stations and the first rainfall lamination pits;
In addition, the Vera wells one and two in the area adjacent to the plant were visited.
The plant is not connected to an external source for inlet / potable water.
The plant discharges its wastewater and rainwater in two creeks leading after few kilometres directly to the main River Brenta.

0.1.1.1 Yes

Comment: The site is located in one catchment.

0.1.1.2 Yes

Comment: The site is managed under a single-based management system by Sanpellegrino SPA.

0.1.1.3 Yes

Comment: The site's primary production process is bottling mineralized water.
Other lines process different kinds of Water, Flavoured Water, and Italian Sparkling soft Drinks.
In a dedicated building, the site produces plastic pre-forme for water and soft drink production for internal use and for different group water bottling sites.

1	STEP 1: GATHER AND UNDERSTAND

1.1

1.1.1

No

Comment

The name of the catchment is Brenta Bacchiglione (ITN003) – The sub-catchment is San Giorgio in Bosco - Cittadella.

The physical scope of the site includes the concession area and the production site.
The water sources are the minerals and industrial wells.
Extension of the concession area:
- "vera" 18.26 ha (released on 13.03.2007). Expiry date 28.03.2028
- "vera seconda" 18.26 ha (released on 29.06.2021). Expiry date 14.05.2042
- Sgib sources are located in the Bolzanella area, on the northwest side of the SGIB factory. Mineral concession areas are located in the countryside and are partially covered by crops and partially by the production plant of Sanpellegrino spa.

Brenta River is not directly connected with sgib mineral and industrial water.

The main water-related infrastructures are:
The site clean water inlet points are:
San Giorgio MINERAL water is the product of the mixing of a group of several wells. The wells are located at an elevation ranging from 33.3 m a.s.l. to 34.2 m a.s.l. Wells intercept the water at the base of the deep local quaternary cover. They are completed with stainless steel casing and sealed in the upper portion (to the ground level) with a cement-bentonite mixture.

San Giorgio industrial water is the product of the mixing of a group of wells. The wells are located at an elevation ranging from 33.1 m a.s.l. to 33.7 m a.s.l.

The plant discharges its wastewater and rainwater in two creeks leading after few kilometres directly to the main River Brenta.
The site wastewater discharge points are:
Discharge to above ground creek FOSSO DI GUARDIA S.P.47
- DEP1 industrial discharge located. The water treated in the biological treatment plant is discharged into surface water through an underground pipe and equipped with a sump for sampling (upstream of the final well.
- DEP1 cooling drain. The cooling water flows into the same endpoint; before the confluence, there is the relative sampling well
- PF PP 1 direct without oil separatorand ; PF PP 3; PF PP 4 collecting rain waters
- SP collecting rain waters. (the latter in water monitoring meteoric 1.3.4 is not indicated

Discharge to above ground creek Roggia Chioro
- PF PP 2 collecting rainwater.

The site provided the following maps:
- 1.1.1 Hydrogeological basin map: overall table with the definition of catchment, recharge areas, concession areas, and areas of influence.
- 1.1.1 B21_WATER DISCHARGES-Layout1- 500: Plan of sewerage: sewer networks, treatment systems, and liquid discharge emission points. The document is the table attached to the application for Integrated Environmental Authorization - non-substantial modification.
- 1.1.1 c10.0_WATER DISCHARGES-layout 1-tav 500: plan of the sewerage: sewer networks, treatment systems, and emission points of liquid discharges;
- 1.1.1 c10.1_ WATER DISCHARGES- scarichi november_2021_mp-a3-100. plan of the sewer networks from ecological areas and relevant drainage areas;
- 1.1.1 Water discharges from Syrup room ;
- 1.1.1 Plan Ring 1 mineral water; the internal distribution of mineral water;
- 1.1.1 Plan Ring 2 water potabile ; the internal distribution of potable water;
- 1.1.1 Well Protection Areas .pdf:
- 1.1.1 Table of wells “Vera seconda” and relevant protection area.
- 1.1.1 table ok wells “Vera” and relevant protection area.

A point of strength of the site is the knowledge and management of the concession area from the hydrogeological approach, which is strictly related to the company's core business.

Finding No: TNR-016579
Finding No: TNR-017607

1.2

1.2.1

in progress

Comment

The stakeholders are divided into five categories:
LOCAL REPRESENTATIVE ORGANISATIONS including REGULATORY (4)
LOCAL BUSINESS (7)
LOCAL INFLUENCERS (2)
LOCAL COMMUNITY (4)
FACTORY INFLUENCERS (2)

The identified SH covers all parties interested in improving the catchment water stewardship. A table summarizes for each SH: category, name, expectation, the influence of SH on site, the influence of site on SH, position vs AWS project, the influence of SH on catchment, and interest in water management.

The process is based on the Group Policy, which is focused on developing and maintaining good relations with local communities living next to NW operations sites through listening, monitoring, dialoging, and responding to their concerns, which is a key prerequisite to local acceptance and long-term growth.
The site has identified the stakeholders according to the CRP process:: Community Relation Process (CRP). The tool is part of Nestlé Waters' commitments to consultation and Creating Shared Value and Water Stewardship. Community relations are a key pillar of the Company's local strategy.
The tool helps to:
- Identify issues, concerns, and expectations at the local level.
- Design a local strategy and action plan.

The process is applied on a three-year basis in all the major sites.
All the results are summarized in a Local Acceptability Index giving a stratified, general overview and trend on how the sites are seen from the local SH.

The Survey is managed by an external independent consultant in communities affected by the factory of SGIB, S.Pellegrino.
The last Research conducted for NESTLÉ WATERS was done in Q1 Q2 2024. The CRP 2024 full report was prepared by the consultant in Q3 2024.
The tool proposes a methodology of 5 stages: mapping of stakeholders, internal diagnosis, external diagnosis, action plan, and evaluation.
The CRP is based on the following assumptions:
- Qualified stakeholders: 10 one-to-one interviews made by the Plan Director to top representatives to present and share the water's common challenges and define the strategies for their development.
- General public: The basic rules for the statistics are:
Telephone interviews (CATI system, Computer-Assisted Telephone Interviewing) structured 10 minutes questionnaire to:
- 50% men / 50% women
- aged 18 years or + ;
- residents in the areas around the NW production sites;
- be Aware of the Sanpellegrino plant;

For a total of 150 interviews in SGIB divided into two equal groups of Indigenous people originating from Cittadella and San Giorgio in Bosco.
The main questions were related to:
- Concern level about the availability of water resources;
- Water resource management
- Environmental impact management
- Contribution to local development
- Plant presence in the community
- Community pride/sentiment

The results are presented with evaluations of data and generate the Legal Accessibility Index in a document developed to provide Sanpellegrino S.p.A. with technical and scientific support for planning water replenishment actions related to the production activities at the industrial plants.

In San Giorgo in Bosco, satisfaction with the presence of the Sanpellegrino plant is overall high as well. In particular, the citizens surveyed expressed high judgments about their pride in

living in this area but also about Nestlé's good management of the water resource. Compared to the past, there is a positive rising rating about the management of the environmental impact, the contribution to local development, and the factory's presence in the area

Finding No: TNR-016542

1.2.2

Yes

Comment

The site has identified and evaluated the stakeholders and their expected potential to influence or be influenced.
The site evaluated and classified the stakeholders according to their level of :
- Influence on the site;
- Influence from the site;
- Attitude;
- Influence of the SH on the catchment;
- Interest in water management.

Each point is graded in 4 levels from low to high value.

1.3

1.3.1

Obs.

Comment

All incident response scenarios are managed for the ISO 14001 system and described in several site documents:
- FMEA table for emergency identification and classification,
- Piano Emergenza Ambientale Sanpellegrino_01-2023

The water-related risks associated with the spillage of liquid substances (hazardous and non-hazardous) are represented by the possibility of contamination of the environment (soil and waterways through site discharges). The incident responses are mainly related to accidental spills of chemicals. :
- Accidental spills of chemical products indoors, in which leakage is conveyed to the internal WWTP. Protection containers against chemical spillage and consequent flow into the site sewer are placed under each chemical storage, and absorption kits are located in several parts of the site and kept under regular maintenance control.
- accidental spillage of chemicals on paved uncovered areas whose collection sewer network is directly connected to WWTP. It is not considered that the discharging area of the WWTP chemical plant is directly connected to a rainwater collection sewer discharging directly to the outside.

If there is a well-founded risk of having contaminated wastewater in the external sewer system, the Coordinator must inform the External authority as soon as possible, providing all the necessary and requested information. to allow the characteristics of the intervention to be carried out to be better identified.

1.3.2

Yes

Comment

The Site identified and mapped all major inputs, outputs, and storage of water related to the production site.
All internal uses of water, such as storage, piping, use, and discharge of all main lines, are also mapped.

1.3.3

Yes

Comment

The main water inputs are the mineral water wells (DEEP WELL 2; DEEP WELL 3; Deep Well 4; Deep Well C); and industrial water wells (Deep Well A; Deep Well B),
Pumping is also constrained by authorization limits, which have never been reached nor approached by the production of the plant.

The main outputs are: bottled products (Product Line 8A; Product Line 18: Product Line 19; Product Line 9B; Product Line 20; Product Line 21; Product Line 22), industrial treated wastewater to municipal plan, clean industrial and rainwater to river, evapotranspiration, losses on the underground collecting system (not on mineral water piping and storage).

All the main flows are measured with dedicated instrumentation, regularly controlled and calibrated to keep good confidence in the results.
An evaluation of the in/out quantity of rainwater is contained in a dedicated document.

The site utilizes a Water Withdrawal (WW) index to evaluate efficiency, measuring m3 of water used (including overflows and overfilling) to produce an m3 of product. The indicator is considered a site general efficiency index, but there is no evidence that it would be a threat to good water balance for catchment people or the environment.
The site declared that the kpi is not comparable to other sites as in SGIB the production is composed of two streams: mineralized water and soft drinks.
The evolution of this indicator of performance is checked periodically, and they can compare these data between years and check the evolution.
The 2024 KPI related to the total production of mineralized water and soft drinks is 1,2 l/l. The kpi is in line with water bottling plants using only plastic bottles.

1.3.4

closed

Comment

The site keeps a detailed chart for planning and monitoring all (in and out) necessary sampling and analysis. The normal routine and process control analysis are done by the internal accredited (point of strength) laboratory, while the official periodical analysis to be shared with the external authorities is made by an external accredited laboratory.
All evidence of testing results is available as a record, and data is analyzed with their trends.

The excellent quality of the water from the wells from an organoleptic point of view is guaranteed by its long stay in the aquifer, linked to the distance traveled from the recharge area to the collection and protection of the surface clay levels as well as by the cementation of the deposits of the undifferentiated aquifer, which protect it from interference with the most vulnerable surface aquifer, directly influenced by human activities.
The Site periodically analyzes the mineralized water coming from the wells: these analyses show that the mineralization over the years is preserved and its quality remains constant. The Site considers this an essential point of strength for the evaluation of the business and industrial company.
The mineralized water quality is under continuous monitoring by the analysis performed by the University of Pavia.
The industrial water used for the soft drinks is also kept under strict monitoring, and there have been no variations in its quality during the last years or in the different seasons.
Industrial water is also used for internal WASH distribution (such as canteen and water distribution in toilets and changing rooms): special analyses are regularly performed to ensure that this water is potable (including the absence of legionella).

The Site performs analysis of its industrial wastewater before the discharge. The Site complies with the limits and regulations according to the permit (PIANO DI TUTELA DELLA ACQUE - DGRV n. 842 del 15/5/2012 Allegato B Tabella 1- Scarico in acque superficiali e prescrizioni tecniche contenute nell'autorizzazione AIA N. 488/IPPC/2022, to discharge into aboveground creek. The analysis is performed on a monthly basis on a mixed 24-hour sample.
The public environmental authorities can perform inspections without notice at any time. These controls have never identified any problem.
The stormwater after collection is separated between the first rain (quantity equivalent to 5mm of rain) and the following flow. The first one is collected in an underground tank and sent to the WWTP (checked during the plant site visit), while the second flow is discharged directly into the external creek as it is considered of good quality. This water is not metered (volumes after evaporation are estimated as 90% of the rainwater). The site AIA outlet water permit does not require quality control on rainwater.

Finding No: TNR-016903

1.3.5

No

Comment

The site has identified and mapped all chemical products, and the locations where they are stored are considered a potential source of pollution.
A map is provided with the chemical deposits' location and the spill kit equipment's location.
A list of all the chemical products approved for use in the factory, with all necessary indications for H&S and environmental correct handling together with SMDS is available.

The dangerous chemicals are stocked only in a dedicated area with a segregated emergency spill collection and moved into the production area only for daily consumption.
The CIP system for the filling lines produces wastewater which is connected to underground sewer pipelines for industrial water where all the drains containing chemicals are discharged and collected to the WWTP.

Finding No: TNR-016902

1.3.6

Yes

Comment

The site does not have any on-site IWRA.
Sanpellegrino SGIB has identified and mapped as on-site protection area surrounding the 7 deep wells.
According to the authorization, each well is protected by a fence for absolute protection and by a wider protection area.
There is an internal department, “Sorgenti” specifically focused on the management and control of the wells; according to the concession, the site also nominated an external specialized consultant as “Direttore di Miniera” with defined responsibilities and duties regarding the correct exploitation of the sources.
The good maintenance of the wells is a focus point for the company's business.

A rich availability of easily accessible water can be found in the area around the site: there are a lot of private, low deep underground wells, and the local population has its well for water supply.

1.3.7

Yes

Comment

The site keeps under control a description/quantification of social, environmental, or economic value generated related to the water management.
The details are managed and periodically updated in a list of annual water-related costs, water-related revenues, and shared-value creation in a table with information such as description, Water-related costs, revenues, shared value creation, and Budget Responsible Comments.
Each project contained in the WSP is associated with its economic details and budget.

1.3.8

Yes

Comment

The on-site WASH, including access to potable water and changing rooms, are strictly regulated by law D.lgs 81/08 (covering all H&S requirements) and the site is very strict on its application, according to Sanpellegrino group approach.
The condition of the WASH facilities at the site can be classified as high standard. There are enough facilities such as toilets, changing rooms with shower facilities, availability of bottled drinkable water, and a cafeteria for all categories of workers during the different shifts, taking into account gender and mobility, including contracted workers and external truck drivers.
The potable water piping and the distribution points are mapped.
Panels explaining the basic rules for hygiene education on site (also related to HACCP rules of the food management system), both in text and pictograms, are widely available.
The water distributed with internal piping to the sinks and the canteen comes from industrial wells. The water is of a very good purity level, the same used for bottled soft drinks. It is periodically monitored by the internal lab with the same analytical method as the bottled water on samples taken at the more distant point of distribution. The internal lab performs the Legionella analyses. According to Italian law, a legal requirement states that only an accredited lab can provide analysis to prove the water's potability. The site laboratory is officially accredited, including legionella.

1.4

1.4.1

Yes

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

1.4.2

Yes

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

1.5

1.5.1

Obs.

Comment	Catchment water governance is strictly regulated and controlled by government agencies, institutions, and other public organizations. It includes water resources management, protection, allocation, monitoring, quality control, treatment, regulation policy, and distribution. These institutions ensure responsible governance, policies, and frameworks for the sharing of water resources in the interests of all users (stakeholders and Indigenous people) and the natural environment in line with the principles of water stewardship and the company's goals. The site has implemented a system to understand and share with the stakeholders the above matters.

1.5.2

Yes

Comment	The Site has developed a comprehensive legal register and yearly assesses its compliance with legal and regulatory requirements according to its ISO 14001 management system. The register contains all legal obligations and scheduling of the periodical checks, duties, and official communications. Every three years, another audit from the group, according to the NER Nestlè Environmental Requirement, is performed. Industrial wells: The concessions contain limits in terms of quantity. Wastewater: the WWTP discharge is regulated by the AIA permit to discharge into the nearby creeks flowing to the main River Brenta: a comprehensive technical attachment to the permit gives all the requirements to be respected in terms of quality and quantity. A complete set of all the legal permits for abstraction and discharge was presented during the audit. A monthly report on the fulfillment of all legal requirements is prepared by the SHE and presented to the Top Management.

1.5.3

Yes

Comment

The site presented a detailed water balance of the sub-catchment with a specific focus on the availability of both surface and deep water. There are no water scarcity problems in the area. The following areas have been identified:

- The mountain sector is characterized by fractured or karst aquifers linked to the infiltration into the rock mass of rainwater from both solid (snow) and liquid rainfall
- The sector of the Upper Plain is characterized by a succession of undifferentiated coarse deposits (gravels and sands) In the Upper Plain, the levels of fine and cemented materials are not continuous; therefore, a single free aquifer is considered to be fed by the losses of the Brenta and its tributaries, by the rainwater supply and by deep waters coming from the fractured aquifer of the bedrock.
- The transition to the aquifer of the Middle Plain is delimited by the area of the resurgences, in which the strong differentiation of the aquifer, linked to the presence of conspicuous and continuous levels of fine clayey deposits, creates a separation on several levels of independent aquifers. The waters tend to rise to the surface, also given the presence of fine deposits that are scarcely permeable on the surface, aligning of lowland springs (resurgences) that form a new surface hydrography.

The underground water collected by the "Vera" and "Vera Seconda" concessions used by Sanpellegrino S.p.a., is located in depth, protected by a clayey level, which locally allows them to have no interconnection with the surface aquifer. These are groundwater of medium depth (40-70 m from p.c.) in aquifer or gravel.
The fraction of the excreted compared to the total groundwater available annually is not very significant, being equal to 0.11% of the total.

The site influences the flow rate of the creeks that receive the treated industrial water and rainwater. In the second case, important atmospheric events could significantly affect the overall flow rate of these receiving bodies.

The surface water balance in the catchment based on the data provided is in surplus.

1.5.4

Yes

Comment

In all the catchment, the quality of the raw underground water is at a high level. The quality of all waters in the catchment is kept under control by the local authority.
The site provided a detailed report on the status of the catchment major underground and surface waters..

The underground water that flows from the mountains is taken in the wells and used for bottling due to its mineral characteristics or as industrial water, while other private wells in the area are used for different private uses by the native populations. All mineralized waters are kept under strict control for production quality control.

The site's industrial wastewater is treated in the WWTP before discharging, reaching the level of quality defined in the discharge permit.
The site analyzes chemical parameters on all industrial and mineral wells under a periodical schedule.
The wastewater outlets and the rainwater/clean process water are also periodically controlled according to the discharge permit regulations and are more frequently analyzed by the internal laboratory.
All data are carefully recorded and monitored.

Other water quality data for the catchment are available from various sources, such as regulators, environmental agencies, and academic studies

The chemical state of the Brenta basin in the area of interest is assessed in accordance with Legislative Decree 152/2006. No exceedances of the Water Quality Standard (SQA) have been reported for this area.

The ecological assessment of the relevant stretch of the Brenta basin indicates that the LIMeco index is generally classified as high or good, with no detected exceedances of the SQA.

For surface water used for irrigation, an evaluation for the 2022–2023 period found that no stretches fall into the worst classification, where irrigation use would be discouraged. In 62% of the assessed stretches, water can be used for irrigation with restrictions, while in the remaining 38%, it can be used without restrictions.

For groundwater, chemical quality is assessed based on Legislative Decree 152/2006, considering halogenated substances, inorganic pollutants, metals, nitrates, pesticides, and PFAS. Exceedances were observed in 2023.

1.5.5

Yes

Comment

The site provided a detailed document containing a study of the catchment IWRAs. The study identified and mapped the most important IWRA, which are all Natura2000 sites and different protection areas in the catchment and their status. The main IWRAs are:

Onara Marsh: The Onara Marsh is currently not managed by a central organization but by volunteer organizations. In the marshy environment of Onara, among reeds, woods, and meadows, there are interesting varieties of aquatic flora and numerous species of birdlife. People from the vicinity come to the Park to relax, hike, bike, and engage in outdoor activities in general.

Brenta River Park: The Brenta River Park is currently managed by a Regional Authority based in Carmignano di Brenta (PD) with offices and a visitor center. The area of the Brenta River Park is included in the Natura 2000 Site "Grave and Brenta Wetlands". The park is involved in the EU's "Life 20302" project on water quality. The site plays a key role in the supply of drinking water, being one of the most important sources in the region, with a potential withdrawal of over 2500 liters per second.
Sanpellegrino Spa is involved in the "Bosco Limite" Project within the boundaries of the Park.

Bosco Limite: Sanpellegrino S.p.A. undertakes a groundwater re-infiltration project to recharge the water table through the limit forest project. The initiative involves the infiltration of 50 l/s, with peaks of 100 l/s, of surplus water derived from the Brenta Reclamation Consortium. Through the construction of dispersing canals within a new forest, the flow rate will be able to be absorbed by the layers of gravel and drainage material found in the subsoil and ensure a recharge of the underground aquifers with water-controlled from the point of view of quality and safety.

1.5.6

in progress

Comment

The site identified and mapped the water infrastructures, including piping connecting the wells to the production site.

Finding No: TNR-016576

1.5.7

Yes

Comment

Approximately 400,000 people live within the mineralized water feeding area (ISTAT 2021-2024 data). Access to adequate WASH service is available for all of them.

In some sectors of the basin, in particular in the municipalities of Cittadella, San Giorgio in Bosco, Tombolo, Fontaniva, Gallera Veneta, Tezze sul Brenta, and Cartigliano, the aqueduct network is very limited, as most of the users have direct access to drinkable water through their own wells.
The local public company managing integrated water service (ETRA) is trying to encourage the connection to its aqueduct,

1.6

1.6.1

Yes

Comment

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

Climate Change / Extreme Weather Events – Hydrogeological Instability. : The challenge is to put in place actions to reduce a possible flooding in case of heavy rains due to poor maintenance of the receiving water collection channels. This is shared with Veneto Strade and Consorzio di Bonifica e delle Risorgive.

Lack of knowledge of the basin and water resource: Demonstrate that the surface aquifer is not connected with the deep mineral aquifer. This is shared with Regione Veneto and Consorzio di Bonifica e delle R
Water as a limited resource: the need to optimize consumption: reduction of site water consumption per unit of final product to reduce the impact on the local water availability. Shared with the Municipality of San Giorgio in Bosco.

Lack of knowledge of the impact of the plant Engagement and education of new generations: social engagement of the site with local school on education on water saving and site open meeting with local population.

Participation in Water Resources Governance: difficulties in water management and/or access to it. Improvement of the distribution and quality of water to the local population. This is shared with the Municipality of San Giorgio in Bosco.

Impact of human activities on catchment: Technical Tables for the implementation of regional and local measures for the protection of aquifers. This is shared with Municipality of i San Giorgio in Bosco, Municipality of Cittadella, Regione Veneto, Consorzio di Bonifica Brenta, ETRA.

Impact of climate change on the Resurgence Belt and the Brenta River: Safeguard of Fascia delle Risorgive and improve accessibility to Palude di Onara. This is shared with Ente Parco Brenta and the municipality of Tombolo.

1.6.2

Yes

Comment

See the activities described in the previous point.

1.7

1.7.1

Yes

Comment

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

A business impact analysis is also developed in a series of tables related to each activity and part of the site. The developed scenarios related to water are flooding, snowfall, and interruption of water supply. Each of these scenarios is developed to develop a business continuity plan or preventive action.

1.7.2

Yes

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

1.8

1.8.1

Yes

Comment The site prepared, with the help of a consultant, a comprehensive analysis of its water-related activities versus the best practice identified in the applicable BAT document. The document maps and examines the best available horizontal and sectoral techniques, applicable to the activities listed in point 6.4 b) of Annex I of Directive 2010/75/EU; specifically, the Implementing Decision (EU) 2019/2031 of 12 November 2019, which establishes conclusions on best available techniques (BAT) for the food, beverage, and milk industries, under Directive 2010/75/EU. In addition, the site has an AIA environmental authorization, which makes direct reference for the identification and management of the prescriptions to the BAT of the sector.
It has therefore prepared an in-depth Technical Report which aims to highlight and analyze the state of application of the aforementioned BAT, with particular focus on the use of water resources and the related water discharges produced.
In particular, as far as the government is concerned, it is also important that the site obtained the certification for its Environmental Management system according to ISO 14001:2015, which is considered a best practice.
The site keeps good relationships with all the stakeholders who are interested in good water and groundwater management in local/catchment, regional, and national contexts

1.8.2

Yes

Comment The site has identified several actions with a specific focus on the management of water quantity starting with the evaluation of the applicable BAT.
In particular, action has been taken to establish, maintain, and regularly review a water balance inventory within the EMS, monitoring the consumption of water, energy, and raw materials, and water flows and discharges.

Specific examples are found on page 8 of 14 of the document '1.8.1 BAT acqua_Sanpellegrino_01.2025' as follows:
- There is no wasted water ; The water used in the rinser of line 20 is reused in the L20-21 can pasteurizer.
- The rinser of line 21 is also equipped with a similar system for recovering the used water, by sending it to the pasteurizer.
- There are automatic controls for the supply of process water so that it can be used when needed.
- Inverter-controlled pumps are present for managing the flow of chilled water or process cooling.

1.8.3

Obs.

Comment

The site has outlined several actions, specifically focusing on enhancing water quality management by analyzing the applicable Best Available Techniques (BAT).
The site studied the implementation of actions that can be classified as best practices shared with the involved stakeholders.
The incoming water is constantly monitored, but no action can be taken.
As regards the water leaving the WWTP, the company monitors the intermediate phases of the process weekly through the collection and analysis of samples in the laboratory inside the factory, according to the established analytical plan. The company also carries out weekly checks (including ammoniacal nitrogen, nitrites, nitrates, and phosphorus), as well as monthly and half-yearly checks to monitor the parameters required in the DEP 1 Industrial discharge authorization.

1.8.4

Yes

Comment

The site has identified several actions with a specific focus on actions to improve the management of IWRA starting from the analysis of the applicable BAT..
For example, for the wetland restoration project, the best practices refer to scientific documents in the sector such as:
SDAGE RMC 2022-2027 Fundamental guidelines Preserving and restoring the functioning of aquatic environments and wetlands pages 209-283
SAGE VNVC Provision 4.3 Quality of surface water and associated aquatic environments part C pages 173-187.

1.8.5

Yes

Comment

The best practices identified refer to both Group standards and international documents such as:
"Nestlé Guidelines on respecting the Human Rights to Water and Sanitation": Guidelines used to install WASH facilities in factories;
Product Donation guidelines; Group document to manage donation of bottles of water to the community within the catchment to support events where access to water is limited
"2211. IN. RG.005-Reference Legislation Register 2022 1.5.2 OJ decree no. 18 of 23 Feb 2023": checklist with annual official analysis, communications, controls, monitoring, and everything required by current legislation.
BCSD Pledge for Access to Safe Water, Sanitation and Hygiene (WASH) at the Workplace: ways to manage punctual problems such as legionella.

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

2.1

2.1.1

Yes

Comment

The site has published its statement signed by the new factory manager Piscitelli on the web page https://www.sanpellegrino-corporate.it/sites/default/files/2024-07/Lettera%20Commitment%20SGIB_0.pdf

The Sanpellegrino SGIB site statement should be read in conjunction with the global Nestlé Water commitment to water stewardship: https://www.sanpellegrino-corporate.it/sites/site.prod1.sanpellegrino-corporate.it/files/2023-06/NESTLÉ%20WATERS%20TIP%20A%20A%20IMPACT%20WATER%20POSITIVE%20_3.pdf

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

The policies are also contained in the 2024 Sustainability Report on page 38.

2.2

2.2.1

Yes

Comment

The Site´s organization chart identifies responsible persons/positions within the facility's organizational structure with a focus on the H&S management system. A signed and publicly disclosed site statement of the organizational document has been defined.
The Site Manager is the only mandated representative regarding legal issues. All operations activities to ensure legal compliance are delegated to the SHE manager.
The SHE team manager reports directly to the site factory manager, who is the person responsible for the factory's legal environmental compliance, including water and wastewater management. All official communication with regulatory agencies is prepared by the SHE manager but officially signed in the name of the factory manager.
A very strict management system is in place to ensure that all environmental permit renewals or periodical data submissions to the regulatory agencies are performed correctly and on time (a requirement also covered by the 14001 certified management system).

2.3

2.3.1

Yes

Comment

A water stewardship strategy statement signed by the factory manager was provided and reviewed. At a group level Sanpellegrino SPA strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements and Group Policy. The local strategy is a consequence.
There is coherence between the Targets and Actions described in the WSP and the overarching mission, vision, and goals described in the Water Stewardship Strategy.

2.3.2

Yes

Comment

The site Water Stewardship Plan details for each water challenge several related risks and opportunities named as projects with measurable AWS outcomes.
Each project or target contains all the info: identification, management, measuring, reporting, and updating are defined.
The table is kept updated regularly during the periodical Management meeting.

2.4

2.4.1

Yes

Comment

The Site has included in its Water Stewardship Plan a plan to mitigate water risks identified and shared with the stakeholders and listed above.

External communication related to environmental risks is also regulated by the AIA authorization. There is a special environmental emergency plan communicated to the control authorities. This is managed in collaboration with the crisis unit of Nestlé Water Italia. In addition, in procedure L0872 SE. PR.010.07 Purification plant and water discharges. Relating to the surveillance and management activities of the WWTP, it is envisaged how to manage the activities in the event of exceeding the limit of a parameter with a series of actions of greater severity up to the complete closure of the discharge and elimination as waste of the entire quantity of polluting waste concerned.
The plant area is not classified as at risk of flooding of the adjacent canals as the adjacent agricultural land is at a lower altitude.

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

3.1

3.1.1

Yes

Comment

An identified starting activity to support good catchment governance and Stakeholder engagement was the meeting with catchment stakeholders held in the factory in January 2025. ,

The Site provided documentation of its efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies, and continuing to expand education on AWS and outcomes toward good water governance. This was confirmed during the auditor stakeholder interviews.
The site has identified within its shared water challenges related to governance several actions and signed with the interested SH a governance, economic, and technical agreement regarding, for example:
- Municipality of San Giorgio for works in the field of environment and water.
- Etifor for the technical support on the IWRA project such as Bosco Limite

3.1.2

Yes

Comment

The site made an effort to identify any water rights not covered by law, but no special points were disclosed.
The continuous monitoring of the influence on the hydraulic area helps to prevent any change or influence on the interests of other parties.
This is also regulated by the well mining authorization.
The water rights for local people are guaranteed by Italian laws and they are mentioned as a point of interest in the Sanpellegrino policy.
The AWS system helps to keep a special focus on specific topics such as:
- Compliance with the requirements of the concessions (Flow rate and buffer areas) as the water flowing from the wells is a common good and must therefore be respected;
- Compliance with the parameters of the discharge water from the site in order not to create pollution issues downstream of the site.

3.2

3.2.1

Yes

Comment

The site process to verify full legal and regulatory compliance is implemented with three different actions.
Every year, an internal audit on legal compliance is performed as a requirement for the 14001 certifications followed by the third part EMS audit; the Bureau Veritas certification audit, although it cannot be considered a legal compliance audit, gives an evaluation of the internal management of the compliance level.
A site internal group audit is also performed with the issue of a NER Nestlé Environment Requirement Self-Declaration covering a Verification of compliance with legislative requirements.
Every 3 years, an audit classified as NIA (Nestle Internal Audit) is performed by an intergroup team highlighting findings in case of negative evidence. The last NIA audit (with an external qualified auditor) was performed in 2024 with a positive result (only one observation regarding the management of documents).

3.2.2

Yes

Comment

The water rights of people outside the site (within the catchment) are guaranteed by law and provided by public service. Sanpellegrino SGIB's influence can only be related to the correct management of environmental requirements regulated by the AIA (site wastewater discharge) or by the mineralized water concessions.
No other specific water rights in legal and regulatory requirements.

3.3

3.3.1

Yes

Comment

The site has complete control of its site water balance, mainly related to its primary production of mineralized water. There is no problem or shortage of water available for production and site utilities.
The Sanpellegrino SGIB site is involved in the following major internal projects (details contained in the AWS Plan):
- Recovery of water from the factory's rinsers for reuse in pasteurizers: the project is still in its preliminary phase with a target of a 50% reduction in the water consumption of the rinsers.
- Eliminate the nano filtration system and replace it with a reverse osmosis plant: the plant engineering part is expected by June 2025 with an annual saving of 7000m3 of water.
- Plant first rainwater analysis
- Plan a campaign of monitoring and analysis of the first rainwater to verify the possible impact on external receiving bodies.

3.3.2

Yes

Comment

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

The site presented also a WATER RESOURCE STUDY E BILANCIO IDROGEOLOGICO study signed by a geologist stating at § 9 that "Given the conditions of substantial stability of the aquifers during pumping and given the substantial decrease in exploitation that has occurred in the last 10 years, it is possible to determine that the groundwater resource is managed with a rational method, guaranteeing recharge and avoiding the depletion of the aquifer.".

Nevertheless, for the catchment, the Nestlé Group water balance target is focused on a compensation of water consumption. .
This project takes on water replenishment actions to compensate for the production activities carried out at the plant located in San Giorgio in Bosco (PD), accounting for both the water used for the industrial processes and the bottled water, for a total amount of 600.00 m3/year of water (target 2025). The base idea is, therefore to carry out these actions within the catchment area of the plant to address water issues that are shared with local communities and stakeholders (SWCs). The Plant is located in the Veneto Plain close to the town of Cittadella, within the province of Padua. Specifically, the Plant is located 20 km South of the Pre-Alps, 23 km North of Padua, and 21 km. East of Vicenza.

3.3.3

Yes

Comment

No water reallocation. Not applicable

3.4

3.4.1

Yes

Comment

Water quality from the authorized water outlet effluent is periodically tested by the internal laboratory and twice a year (or during unannounced visits) by the official Environmental Agency, according to the AIA authorization. The limits defined in the permit have always been respected.
The respect of the water quality targets is kept under control in the management review.

3.4.2

Yes

Comment

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

3.5

3.5.1

Yes

Comment

On-site, the IWRA are the heads of the wells: there are no improvements expected.
The IWRA identified within the catchment are taken into consideration in the Water Stewardship Plan with specific actions:
- Onara Marsh; An initial feasibility study of the project has been launched.
-Brenta River Park; meetings were held with all stakeholders to define the technical scope of the project.
- Bosco Limite: The project has been underway since 2024; many meetings have been held with all interested parties to define the technical scope of the project, which is part of the group's water refurbishment plans. Analytical surveys of the waters concerned were carried out, and the type of water sprinkling in the soil was defined.

3.6

3.6.1

Yes

Comment

Provision for WASH access to all workers inside the site is granted by law, and it is not a potential problem in the Site location. Drinking water is available to everybody throughout the site with local dispensers and bottled water, which is provided in unlimited numbers for the use of the employees, contractors, and external drivers.
The site continuously monitors the quality of the distributed water in terms of potable characteristics and legionella.
Good provision of sanitation services was observed on site. The number and quality of changing rooms and toilets were checked during the site visit: their number and quality are higher than the requirements defined by the H&S legal regulations.

3.6.2

Yes

Comment

The respect of human rights related to access to WASH for local communities within the catchment are granted by law, and it is not a potential problem in the Site location.
The site is not impinging on the human right to safe water and sanitation of communities through its operations.
The site is constantly respecting the quantity of water withdrawn from the wells in accordance with the concessions. This is declared annually to the Authority, who make a strict control on the data.
The local water authority in the area ETRA is conducting a campaign to invite all the residents (industrial and private citizens) who are now holding a permit to run its proper well to connect to the municipal network. These wells are normally collecting water on the first underground water lens while the site takes its mineralized water from the deeper layers.
The site declared that there have been no complaints, grievances, or legal actions related to WASH.

3.7

3.7.1

Yes

Comment

There is no relevant supplier's company located in the catchment.
Nevertheless, Sanpellegrino SGIB started in cooperation with Nestlè Water a project to involve all the major suppliers (also not directly located in the relevant catchment) in the correct water management related to their production.

3.7.2

Obs.

Comment

Sanpellegrino SGIB started, in cooperation with Nestlè Water, a project to involve all the major suppliers (although not directly located in the catchment) in the correct water management related to their production.
The packaging supplier also provided some KPIs on their internal management of the water cycle. The Group Water Team recently had A meeting with CDS Smith (packaging supplier). The next step will be a meeting with the Can Supplier, which is also a supplier of another site (producing soft drinks) that was previously AWS-certified.

As regards the producers of citrus fruits and fruit concentrates in general, the requirement of regenerative agriculture practice (with a focus on CO2 and water consumption) has been introduced. The use of suppliers who implement regenerative culture is a group goal.

Inside the site, some services such as general cleaning, waste collection, renoval, storage and final disposal, internal and external floor dry or wet cleaning are provided by a supplier. ("Cooperativa"). Some of these activities might be relevant for the site's water management. The site did not provide evidence of an involvement of the supplier in the AWS system.

3.8

3.8.1

Yes

Comment

The site engaged in official communication with the public authorities about its water and Environmental authorization and permit:
- Regione Veneto Region for concessions for the water expungement from wells.
- Veneto Strade: for the concession and management of the agricultural creek receiving the water leaving the plant (in front):
- The authority has issued prescriptions that are regularly followed and respected (e.g., prescriptions: periodic cleaning of the canal in the section of the discharge). The site carries out this activity through a supplier whose evidence of carrying out the activity has been shown.
- the Consorzio di Bonifica for the Chioro Creek: the concession of the Province of Padova no. 0111947/201is available 1 discharge authorization: there are no prescriptions.
The site correctly manages and keeps evidence of all the mandatory communications in a dedicated register.

3.9

3.9.1

Yes

Comment

The site water department, in cooperation with the Nestlé Group Water department, is always working to implement the best practices related to water governance (see 1.8.1).
- The company adopts a certified environmental management system compliant with the requirements of the UNI EN ISO 14001:2015 standard.
- The plant adopts an AIA PMC for the collection of raw materials and auxiliary data collection, water resources, energy consumed and produced, as well as the frequency of self-control, the source of the data, and reporting activities. The company uses performance indicators on the specific consumption of raw materials (additives, sweeteners, extracts, juices, and flavors), energy consumption, and purified water.
- The site organizes yearly meetings with the local water public authority demonstrating support for good water governance and stewardship with appropriate authorities and stakeholders.- The site participates in a global Nestle working group: the Gruppo Nestle - Water dpt monthly meetings with an exchange of experience on water management, internal benchmarking, and comprehensive water stewardship. This includes documentation of best practice actions, the benefits, and detailed approaches to implementation to enable other sites to do the same.

The actions proposed for the San Giorgio in Bosco Plant follow the two main themes:
- Impact of climate change on the Brenta River and its Resurgence Belt
- Impact of human activities on catchment

The following projects are related to these issues:
- Bosco Limite Project (water regeneration)
  - opening of a technical table with the Veneto Region to discuss possible protection measures in the Catchment;
- protection of the Palude di Onara;
  - chemical and microbiological monitoring of the spy piezometer carried out in 2024;
  - Involvement of neighboring municipalities in the most vulnerable parts of the basin: Cittadella, Tezze sul Brenta, Rosà, Bassano del Grappa, etc...;

3.9.2

Yes

Comment The site implemented some steps to implement its best practice-defined objectives in terms of quantity. For example:

- There is no waste of water; water not intended for production is reused; Resource quantities are recorded on monthly reports.
- Water consumption for rinsing bottles is monitored and reduced to a minimum.
- The water used in the rinser of line 20 is reused in the can pasteurizer L20-21.
- The rinser of line 21 is also equipped with a similar system for recovering the water used by sending it to the pasteurizer.
- A similar system is used for Line 22, with delivery to the pasteurizer.
- Where possible, there are recovery cycles for washing water from rinsers.
- There are inverter-controlled pumps for managing chilled water flows or process cooling.

3.9.3

Obs.

Comment The site implemented some steps to implement its best practice-defined objectives in terms of quality. For example:
- Analytical checks are carried out according to authorization requirements, and in particular, following table 2.1.4 of the AIA PMC, which provides for weekly monitoring through an accredited internal laboratory.
- The company carries out the monitoring of the "critical" phases every week through the collection and analysis of samples in the factory's internal laboratory, according to the analytical plan established in point 2.1.4 of the AIA PMC.
- The sampling points are:
- • Accumulation/equalization;
- • Oxidation tanks;
- • Industrial DEP1 purification discharge;
- • DEP1 final drain.
- Weekly evaluation is carried out for the monitoring of ammoniacal nitrogen, nitrite, nitrate, and phosphorus in the purification discharge and the DEP1 Industrial treated water outlet point.

3.9.4

Yes

Comment The site collaborates for the implementation of IWRA projects with the competent authorities for the management of the water cycle for the scientific and technical part with a consulting company. The activities are carried out according to a high level of specialization and updated to the latest and best technologies available. -
For example, for the WATER REPLENISHMENT FEASIBILITY STUDY of "Area forestale di infiltrazione, case study - Stabilimento Acqua Vera, San Giorgio in.
Bosco:" The project goal is to design and verify the environmental feasibility of a Forested Infiltration Pond as a water compensation action. This water replenishment action returns to the local hydrogeological system a water volume equal to or greater than the water collected annually by the plant to meet the needs of local stakeholders.

3.9.5

Obs.

Comment The activities implemented are part of the normal operational management of the site and are under the constant monitoring of the SHE sector.

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

4.1

4.1.1

Yes

Comment

For all the projects detailed in the AWS Plan, the site keeps control of its progress and performance against each quantified target with Monthly meetings.
The meeting is attended by the entire Factory Leadership Team. During the meeting, the WSP scoreboard is updated in Columns O and P.
During the meeting, an update covering the AWS system with a focus on data and the project's advancement is discussed and evaluated. A comparison between the achieved and the expected results is performed to evaluate the efficiency of the project against the expected targets. The management of each project is done with an internal project management tool shared with all the Nestlé Water Group departments.
The process owner presents the progress of the project to the Management and the Water team.
Some projects have a duration of more than one year; in this case, intermediate steps are defined to monitor the progressive steps of the projects.
When a specific CAPEX is related to an objective, an evaluation of the milestones is also carried out.
There is a procedure for managing CAPEX: Appendix 5 relates to environmental and sustainability evaluation.
For other projects to save water or reduce pollutants and within the site as process optimization, the SHEPM methodology is specific to the Group for sustainability projects and is used to give traceability.
Other similar projects in the context of regeneration (for example: Bosco) have their own separate design and control methods because they also involve external parties.

4.1.2

Yes

Comment

In the AWS plan, the cost for each objective is defined and approved by the top management as a budget before starting operations on it.
The goal (i.e.: water consumption reduction, construction of a new sewage system) is indicated. whenever possible and applicable, the goal is quantified in terms of value or technical measurement. The value benefit is evaluated during the management review.
Most objectives are related to a qualitative more than quantitative target: the follow-up and updating of the evaluation is not easily measurable.
The site also provided a separate table summarizing all costs and benefits for each activity with a detailed financial analysis.

.

4.1.3

Yes

Comment

Some projects contained in the AWS plan will bring future benefits to the community.
For example, on the Bosco Limitet, the goal is water regeneration. The benefit for the stakeholders in the catchment is defined in the project. The organizations Bluerisk and Valuing Impact will provide to the SGIB site a tool to model volumetric benefits,

According to the general environmental approach of Sanpellegrino SGIB, a special focus is also dedicated to CO2 emission reduction: the water savings projects can also contribute to this project.

4.2

4.2.1

Yes

Comment

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

4.3

4.3.1

closed

Comment

As part of Nestlé Waters' commitments to creating Shared Value and Water Stewardship, community relations are the key pillar of the Company's local strategy. Developing and maintaining good relations with local communities living next to Nestlé WATER sites through listening, monitoring, dialogue, and answering to their concerns is a key prerequisite for local acceptance and long-term growth.
Nestlé Waters has developed the COMMUNITY RELATIONSHIP PROCESS (CRP) 3.0 to improve their relations with the local stakeholders.
The tool proposes a methodology of 5 stages: mapping of stakeholders, internal diagnosis, external diagnosis, action plan, and evaluation. In 2024, the survey was run by DOXA (750 interviews in total for the four sites) with an evaluation of the Local Acceptability Index.
The detailed report prepared by DOXA covers the measurement of how Stakeholders experience the reality of the factory on the territory, with general topics of factory impact on the territory including site water management. The results are very positive for all the sites, including SGIB.
Another tool for consultation and presentation of the WSP projects is planned with the main SHs: Meetings have already been put in place by the factory manager or by the person responsible of the project. at the beginning of 2025. This consultation is finalized to confirm shared water challenges and Important Water-Related Areas in the catchment. The form of the consultation is appropriate for the local context.

The interview with Mayor Pettenuzzo of San Giorgio in Bosco was sampled: the only concern is about the pressure on the water resource availability for the community that requires monitoring and management to be shared with the Municipality. The report is classified under the Issue "lowering of the water availability" and therefore related to the Bosco Limite project.
Also, from the DOXA interviews, the problem is highlighted by the population.

For updates on the progress and results of individual projects, communication is continuous with the help and coordination of the Group support. The Site is engaged in active communication with the main stakeholders. Direct communications are planned at least once per year to communicate and review the water stewardship performance.

Finding No: TNR-017579

4.4

4.4.1

Yes

Comment

The WSP is kept updated at every management meeting. The previous revision of the files is available as a record.
Any change on a project is indicated, discussed, evaluated, and agreed upon, and the plan is changed accordingly.

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

5.1

5.1.1

Yes

Comment

The Site has an organization chart with the people named in a hierarchical order related to the governance of environmental matters, including the water issues and AWS responsibility. A second organizational chart is issued related to HSE.
The charts are disclosed in the internal intranet and published in the internal communication board.
A dedicated team is nominated for the implementation of the Standard AWS- international water stewardship standard
All legal environmental responsibilities are in the responsibilities assigned to the Factory Manager (S.M.) as stated in an official delegation of power.

5.2

5.2.1

Yes

Comment

External communication is regularly issued according to the Communication process.
A Sanpellegrino Sustainability Report at the Group level is published every year.
The water stewardship plan, including its contributions to AWS Standard outcomes, is communicated to relevant stakeholders.
The feedback is kept under control by analyzing the results of the interviews with Stakeholders done by the site manager: they confirmed that the site keeps an active communication related to the implementation of the AWS outcomes.

The dedicated central office in Milan, covering four sites, manages external communication through press releases, publications, and local presentations with interested parties to support local communication.
The group produces an aggregate sustainability report available at this link: https://www.sanpellegrino-corporate.it/it/news-media/press-office/sustainability-report-2024 with the data up to 2023. .
The AWS Sanpellegrino SGIB project and challenges were shared with the external stakeholders, the two local mayors, and institutions in the presentation meeting held on 27 January 2025.
The general meeting dedicated to all internal staff was held in December 2024.

5.3

5.3.1

Yes

Comment The site will produce a summary of their annual WSP performance in an abstract of the WSP. This includes quantified performance against targets, which will be communicated to interested stakeholders.
General information on the AWS system is given in the internal communication periodical news, in the internal standard communication channel, and on the commitment and policy.
The website's general presentation will be used for clients and guests.
The actual Sanpellegrino Sustainability Report 2024 contains info on water consumption and the commitment to water stewardship and is available on the company website. The good management of water and relevant associated problems was already a focus point of the site before the AWS implementation..

5.4

5.4.1

closed

Comment The site will share water challenges, including associated efforts to address the challenges; engagement with local authorities, public-sector agencies, other local companies, organizations, and community groups in the area; and other companies within the Nestlé Water group.
A first presentation meeting was held on 27 January 2025 to present the effort made to implement the AWS system and collect any info or proposals on shared water challenges from the external stakeholders.
A general follow-up meeting is planned once a year.
The Sanpellegrino Water Team always organizes activities for World Water Day, and the SGIB site always attends and is involved in the planned activities. For the SGiB site, particular emphasis was given to the project to recharge the Brenta aquifer.

Finding No: TNR-017581

5.4.2

Yes

Comment Efforts have been made by the site to engage stakeholders and coordinate and support public sector agencies in collectively address shared water challenges.
For all the projects contained in the WSP and described here above, a general introduction meeting was performed in January 2025. For each project, meetings are regularly planned for the development of the projects and recorded in working minutes of meetings.
An example of stakeholder engagement in a project is the contract for the water replenishment project (Bosco in CArmignan di Brenta) signed on 22 June 2023 with ETIFOR (consulting company of Padova University).
Another project is the activity for the schools that started in 2024: "A Scuola d'acqua" project available through a platform dedicated to primary school teachers: it offers tools and activities that can be proposed to students on water management and savings.

Some of the projects in the WSP involve the following organisations
-Municipality of Carmignano Brenta
- Land Reclamation Consortium
- Basin Authority - Veneto Region

5.5

5.5.1

Yes

Comment No water-related compliance violations have occurred in-house.
According to a legal AIA authorization requirement, any violation that would occur must be disclosed to the local authorities.

5.5.2

Yes

Comment The requirement was evaluated, but the site declared that no violation had occurend for several years.

5.5.3

Yes

Comment The requirement was evaluated, but the site declared that no violation had occurred since several years.

Photographic Evidence from Audit

IMG-20250206-WA0013.jpg

20221005_160727.jpg

IMG-20250206-WA0003.jpg

IMG-20250206-WA0009.jpg

Yes

IMG-20250206-WA0004.jpg

IMG-20250206-WA0006.jpg

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Previous Findings

N/A