CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001598

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **BAT Trieste S.p.A.**

Address: San Dorligo della Valle Dolina (TS) – Località Bagnoli della Rosandra SNC, 34018, Trieste, ITALY

Contact Person: Sofia Sancin Alfieri

AWS Reference Number: AWS-000692

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Aug-28

Validity of certificate: 2028-Aug-27

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2025-Jul-15

Audit End Date: 2025-Jul-17

Lead Auditor: Lorenzo Brioschi

Audit team participants:

Abbas El Toufaili, Observer

Lorenzo Brioschsi, Lead Auditor

Site Participants:

Sofia Sancin Alfieri, EHS Analyst

Marco Saule, EHS Analyst

Sasa Cvetkovic, TIH Engineering & Site Services Manager

Rocco De Rinaldis, Project Engineer

Yilmar Builes Zapata, EHS Project Manager

Christian Cicala, Line Lead

Ilaria Troncia, Sustainability and Water Stewardship advisor (HPC)

Beatrice Bizzaro, Technology Leader for Water Stewardship services (HPC)

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Jul-15	08:00:00 - 17:30:00	09:30	Lorenzo Brioschi	
2025-Jul-16	08:00:00 - 16:30:00	08:30	Lorenzo Brioschi	
2025-Jul-17	08:00:00 - 16:00:00	08:00	Lorenzo Brioschi	

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit no non-conformities and 9 observations were raised.

The audit team recommends certification of BAT Trieste at Core level.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Trieste S.p.A. against the AWS International Water Stewardship Standard Version 2.

The British American Tobacco Site of Trieste (here forward BAT Trieste S.p.A.) is located in Bagnoli della Rosandra, a small district of the Municipally of San Dorlingo della Valle, which belongs to the Province of Trieste in the Friuli Venezia Giulia Region (Figure 1), northeast of Italy.
BAT Trieste's premises cover an area of approximately 24,000 m² within Interporto Trieste, a logistics complex situated about 10 km southeast of the city of Trieste. The morphology of the area is generally flat, with an altitude of approximately 50 m above sea level. The site is located within the Interporto site, a logistics center related to the international port of Trieste.

The site was build in January 2022 and the first production started in January 2023. It currently employs about 350 FTE and expanding. The current production consists in nicotine pouches which raw materials are provided by other BAT sites. However, the site is currently commissioning a production line to produce the pouches materials and two additional lines for other smokeless products (New Department and NRT). The site is principally exporting in EU countries but also has some out of EU markets.

The geology of BAT Trieste's premises is composed of Upper Lutetian flysch deposits (FT – Flysch di Trieste). These deposits feature sedimentary rock sequences—such as sandstones, shales, and siltstones—typical of deep marine environments in tectonically active areas.

The Rosandra Stream is situated in close proximity to BAT Trieste's premises, approximately 260 meters to the west of its boundaries, flowing through the Rosandra Valley in a northeast-southwest direction.
The Municipal territory of San Dorligo della Valle, in which BAT Trieste S.p.A. is located, contains several significant geomorphological features that influence the local hydrogeology:
- Val Rosandra (Dolina Glinščice): a valley and protected area through which the Rosandra Stream flows, featuring deep gorges, cliffs, a rich diversity of flora and fauna, and important archaeological sites
- Carso Classico (Classic Karst region): a rocky limestone plateau featuring a unique landscape of exposed limestone, sinkholes, underground rivers, and caves. This plateau is part of a larger karst system that extends throughout the Friuli Venezia Giulia Region, Slovenia, and Croatia
- Karst aquifer system: a complex network of underground channels and aquifers that often resurfaces as springs. This system is characteristic of the local territory due to its limestone formations, where karst processes—such as weathering and dissolution caused by water interacting with permeable carbonate rocks—shape distinctive landforms.

The audit was conducted onsite on 15-17 July 2025.
The onsite site visit included the assessment of the different production halls, the warehouses, the offices, the canteen, the chemical storage area, water utilities, site surroundings, water inlet and outlets (when visible), the water and waste water storage.

FINDINGS

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001598

NUMBER OF FINDINGS PER LEVEL

Observation	9

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

FINDING DETAILS

Finding No:	TNR-019532
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site should continue the effort to understand what water-related challenges and interests different stakeholders have, by engaging stakeholders in an open way.

Finding No:	TNR-019601
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The catchment water balance was undertaken for part of the catchment rather than the whole catchment, although it is acknowledged that more uncertainty may be related to the complexity of the underground karstic system and the multiple water sources.

Finding No:	TNR-018794
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site identified some of the condition and potential exposure to extreme events based on existing literature and information publicly available. The site is encouraged to continue engagement efforts with water supplier to gather additional and more specific feedback on the condition and potential exposure to extreme events of the shared water-related infrastructure.

Finding No:	TNR-018770
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	Currently the site kept the complete list of shared water challenges identified by the stakeholders, however as commented during the audit, some stakeholder identified challenges seem to be less relevant when compared to available scientific data for the catchment. Although the site did a good analysis to understand water challenges in the catchment, it listed generically worded challenges (e.g. water quality) in its survey to stakeholders. It is suggested to review the list of shared water challenges to keep those that are pertinent and to engage differently the stakeholders by using less generic wording for the shared water challenges.

Finding No:	TNR-018872
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	Site identified some generic and some more specific initiatives. The majority of those would be governance initiatives, site is encouraged to identify specific actions within these governance plans (e.g. the flooding plan could contain some more practical actions in the plan that might be relevant for collective action).

Finding No:	TNR-019497
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The current WSP is made with targets set per each action instead of actions to achieve a set of targets as required by the AWS standard. The site should identify what are the overall targets on balance, quality, identified IWRAs, governance, or on specific shared water challenges and link the planned actions to them.

Finding No:	TNR-018841
Checklist Item No:	3.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	It is currently difficult to identify the contribution of separate water saving actions to the general water saving target as single actions targets are also set as a percentage reduction. The relevance of having an overall volumetric saving target for the plant is also questionable as the site is currently expanding and two new productions units are being finalised. It is advised to harmonise the accounting of the water savings actions in order to facilitate the water balance improvement efforts.

Finding No:	TNR-019499
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site is encouraged to think about what can be done to address issues/threats in identified IWRAs, i.e. what can be done to address issues/threats identified in 1.5.5. The practices set in the water stewardship plan should aim to address existing issues on identified IWRAs.

Finding No:	TNR-018859
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Currently the site did not gather a full year data and could not identify the water savings that completed actions allowed and subsequent value creation (or financial savings). Note that this cost saving analysis (or value creation) should be available to be reviewed for the next surveillance audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001598

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Lorenzo Brioschi
Report approved by	Neringa Pumputyte
Report approved on (Date)	28 August 2025

Surveillance

Proposed date for next audit
2026-Jul-13

Stakeholder Announcements

Date of publication	Location
29/04/2025	https://www.batitalia.com/content/dam/endmarkets/it/it/download/sutainability-and-responsibility/BAT_Trieste_Stakeholder_Announcement_2025_-_ENG.pdf
29/04/2025	https://a4ws.org/wp-content/uploads/2025/05/AWS-000692_BAT-Trieste_StakeholderAnnouncement_July-2025_V3.0.pdf
30/05/2025	Il Piccolo - local newspaper from Trieste.

Catchment Information

Catchment Information

Strictly speaking, the site is located in the surface water catchment of the Rosandra stream which start its course in Slovenia and ends in the Adriatic Sea. However, the site identified the whole Levante basin as their surface catchment on which they will focus their water stewardship activities. As for the groundwater catchment, the municipal water supplier has several water sources which catchment area are also considered in the site water stewardship plan:
- Pianura (Alta) dell'Isonzo aquifer, a groundwater body characterized by highly permeable material (alluvial and fluvial-glacial deposits) which guarantees significant and good groundwater quality reserves
- The Sardos spring - main water source for the site - originates from the limestones formation of the karst aquifer system and emerges at the surface in proximity to San Giovanni di Duino village;
- Timavo Spring, a spring which marks the resurgence of the Timavo River.

The Levante basin has a total area of approximately 1,275 km², of which about 940 km² lie within Slovenian territory. It is composed of two geomorphologically very different zones: the easternmost edge of the Friulian plain, east of the Isonzo River, where a series of artificial canals flow, and the Karst area.

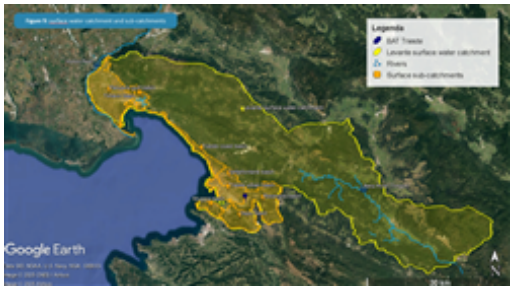
The Karst area is crossed by three main watercourses: the Timavo River, the Ospo stream, and the Rosandra torrent.

The Timavo is considered the "classic river of karst hydrology" because, after a long surface course through Slovenian territory, it disappears into the grand chasm of San Canziano and reemerges several kilometers later in Italian territory, not far from the sea. In reality, the Timavo is less the continuation of the surface course of the Reka and more the collector of all the underground waters drained from the vast Karst area.

Zaule Municipal Wastewater treatment plant is treating the waste water and discharging it directly in the Adriatic sea. The rainwater (both roof and parking) are discharged directly in the Rosandra river after passing through an oil separator. The industrial waters are stored and incinerated a couple of times per year into the ITS Ecologia S.r.l. incinerator located near Trieste (outside catchment).

As for the groundwater bodies they are identified as the following depending on the source of water used:
Pianura (Alta e Bassa) dell'Isonzo aquifer – the groundwater aquifer in which the 13 water wells of San Pier d'Isonzo and Staranzano are located
Karst aquifer system (Carso Classico Isontino e Triestino) - Karst aquifer system of the Carso Classico from which the Timavo and Sardos Springs originates
Flysch Triestino aquifer – the groundwater aquifer which encompasses the City of Trieste, the Gulf of Trieste and BAT Trieste

The site is located nearby an environmental protected area: the Natural Parc of the Rosandra steam. As for catchment features, there is no specific water shortage in the area nor flooding risks. As for the inter-basin exchanges, it is difficult to identify because of the karstic nature of the groundwater aquifers. It was however identified that most of the Timavo river that is disappearing underground in Slovenia, is actually not the water of the same river coming out in the Italian side as the underground river is draining waters from the whole region.



Levante basin.png

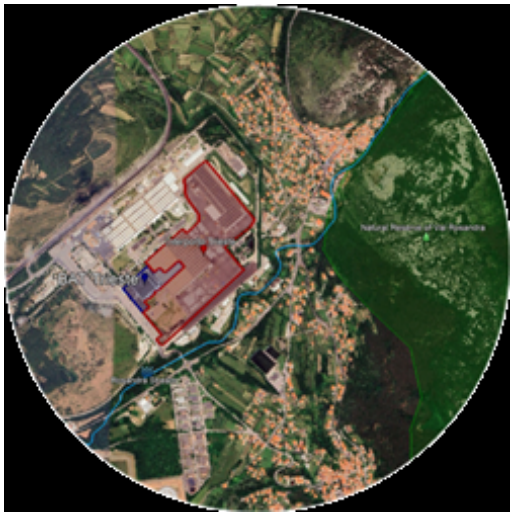
Client Description and Site Details

Client/Site Background

The British American Tobacco Site of Trieste (here forward BAT Trieste S.p.A.) is located in Bagnoli della Rosandra, a small district of the Municipally of San Dorlingo della Valle, which belongs to the Province of Trieste in the Friuli Venezia Giulia Region (Figure 1), northeast of Italy.
BAT Trieste's premises cover an area of approximately 24,000 m² within Interporto Trieste, a logistics complex situated about 10 km southeast of the city of Trieste. The morphology of the area is generally flat, with an altitude of approximately 50 m above sea level. The site is located within the Interporto site, a logistics center related to the international port of Trieste.

The site currently employs about 350 FTE and expanding. The current production consists in nicotine pouches which raw materials are provided by other BAT sites. However, the site is currently commissioning a production line to produce the pouches materials and two additional lines for other smokeless products.

Here is the description of the water infrastructure on site:
1. The site is connected to the municipal water provider, water supplier. Water supplier manages an extensive drinking water distribution network across the Province of Trieste. The network includes: main supply lines, one of which was built in 1929 and running parallel to the coast from the area of Duino-Aurisina to the area of Muggia, and a second underwater pipeline running across the Gulf of Trieste; 16 pumping stations; +30 storage tanks with a total capacity of 129,000 liters. No other water sources are used.
2. There are no water treatment facilities on site and water used in production. Water consumption is mainly used for sanitary and the canteen. Water uses in production is currently only used to humidify the pouches. The water used for this process is municipal drinking water and do not require any specific treatment. The future production of pharmaceutical grade products will require the use of RO water, that will be produced thanks to a mobile RO unit.
5. Wastewater treatment facilities - The sanitary waste water is discharged into the local sewers and treated by the Zaule Municipal Waste Water Treatment Plant which discharges the treated effluent into the Adriatic Sea. Industrial waste water are stored in an underground tank and transported outside catchment in Trieste where supplier ITS Ecologia S.r.l. incinerate the waters containing high Nicotine residuals. The rain and stormwaters are collected and discharged to the Rosandra stream without treatment. An oil separator managed by Interporto is protecting the stream from possible gasoline residuals coming from the parking lots.
6. Cooling towers - Currently closed loop cooling towers are in use. These air cooled towers use an air humidifier to increase cooling during summer months. That water is also recycled in a loop and as such the water consumption of these cooling towers is quite low.
7. Rainwater harvesting infrastructure - Rain water is currently not harvested.
8. Stormwater management infrastructure - no specific storm water infrastructure on site, water are conveyed to the Rosandra Stream nearby.
9. Fire water. Three 100 m3 tanks can be found on site to cover the fire water needs of all three production halls.



site boundaries.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The shared water challenges identified through stakeholders consultations are:
- Infrastructure vulnerability.
- Flooding: Extreme rainfall events, see level increasing and flooding the city center of Trieste (at the moment once per year).
- Water Quality Degradation
- Water scarcity - but does not seem to be confirmed by scientific literature.

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes

Comment

The site boundaries are identified clearly within the Interporto site. It is important to note that some of the site water infrastructure is common between the Interporto warehouse and the BAT Trieste site: degreaser of the rain and storm water; the rainwater outlet to the Rosandra stream.

The site is located in the Rosandra stream catchment (surface catchment), which starts in Slovenia and ends its course in the Adriatic Sea a couple of kilometres from the BAT Trieste site.

The water supply strictly comes from the municipal water supplier which uses several water sources:
- Pianura (Alta) dell'Isonzo aquifer, a groundwater body characterized by highly permeable material (alluvial and fluvial-glacial deposits) which guarantees significant and good groundwater quality reserves
- The Sardos spring - main water source for the site - originates from the limestones formation of the karst aquifer system and emerges at the surface in proximity to San Giovanni di Duino village;
- Timavo Spring, a spring which marks the resurgence of the Timavo River.

The sanitary waste water is discharged into the local sewers and treated by the Zaule Municipal Waste Water Treatment Plant located which discharges the treated effluent into the Adriatic Sea. Industrial waste water are stored in an underground tank and transported outside catchment in Trieste where supplier ITS Ecologia S.r.l. incinerate the waters containing high Nicotine residuals, as such it is not considered in the physical scope of the site. The rain and stormwaters are collected and discharged to the Rosandra stream without treatment. An oil separator managed by Interporto is protecting the stream from possible gasoline residuals coming from the parking lots.

BAT Trieste Physical Scope has been identified based on the following surface and groundwater catchment areas, located within the Italian national borders:
- The surface water catchment area of Levante, which includes the following sub-catchment areas:
Rosandra – the sub catchment area of the Rosandra Stream, in which Interporto Trieste discharges BAT Trieste's rain and stormwaters
Muggia and Ospo – the sub-catchment areas of the Muggia and Ospo Stream, located at approximately 2 and 5 km from BAT Trieste
Timavo – the sub-catchment area in which the Timavo and Sardos Springs are located, from which water supplier withdrawals its raw waters via the Randaccio Aqueduct.
Panzano gulf - the sub-catchment area in which the 13 water wells of San Pier d'Isonzo and Staranzano are located
Trieste urban, Trieste coast and Settefontane - the sub-catchment areas of the city of Trieste in which the Zaule WWTP is located and discharges in the Adriatic Sea
- The groundwater catchment area of the following aquifer bodies:
Pianura (Alta e Bassa) dell'Isonzo aquifer – the groundwater aquifer in which the 13 water wells of San Pier d'Isonzo and Staranzano are located
Karst aquifer system (Carso Classico Isontino e Triestino) - Karst aquifer system of the Carso Classico from which the Timavo and Sardos Springs originates
Flysch Triestino aquifer – the groundwater aquifer which encompasses the City of Trieste, the Gulf of Trieste and BAT Trieste

1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

1.2.1	*Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* *- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;* *- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;* *- Provide evidence of stakeholder consultation on water-related interests and challenges;* *- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;* *- Identify the degree of stakeholder engagement based on their level of interest and influence.*	Obs.
Comment	The attached stakeholder list and memorandum clearly specify the identification process, and inclusively cover all relevant stakeholders groups including vulnerable (the minority Slovenian language population is represented by the association) and the Consorzio Italiano di Solidarietà (ICS) - a private NGO who helps the vulnerable people seeking for asylum. - The stakeholder identification process consider the physical scope identified in 1.1.1 and stakeholders are mapped in Google Earth. - The consultation efforts are detailed in the Memorandum (specific contact) and QA summary (questionnaire sent and feedback received). The degree of stakeholder engagement is indicated in the column O and includes the level of interest and influence. - All stakeholders were invited to an on site event where the site water stewardship journey was presented and stakeholders could exchange on their interests and challenges. More than 10 stakeholders joined the event.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes
Comment	The degree of influence of site to stakeholder and stakeholders' to site is identified in column J to M.	
1.3	*Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*	
1.3.1	*Existing water-related incident response plans shall be identified.*	Yes
Comment	The following water-related incident response plans are identified: - BAT Trieste Emergency Plan: This is the general emergency and incident plan of the site. Chapter 16 is specifically addressing water supply and flooding incidents. Chapter 14.8 is related to chemical spills. - BAT Trieste Natural Event Plan: considers the natural disasters like flooding, earthquakes, fires and power failures. - BAT Trieste Procedure for the management of chemical spills in the logistic and the training records of the different departments (also Interporto personnel). - BAT Trieste procedure to handle Nicotine. The site is thinking to merge the natural disasters into the site Emergency Plan in the future.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes
Comment	A water balance was done by the site on a Sankey diagram, it successfully include all the water inputs and outputs on-site and their relative size within the site along with the storages. Losses in NRT production and losses caused by evaporations are also identified on the diagram.	

1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*

Yes

Comment

- The site water balance exercise for 2024 and partially for 2025 were submitted by the site.
- A seasonality is indicated because of the cooling towers water usage. June and August months are particularly high. To note that in that year the site passed to a 24/7 production and therefore the water consumption of the last month of the year was particularly high compared to the rest of the year. As the site is currently implementing new production lines, it is expected to have an increase in overall water consumption in the next months/years.

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*

Yes

Comment

- Site elaborated a water and waste water sampling plan in 2024 as per attached document. It covers the analysis of the drinking water, waste water and rain water on site. It also identifies the analysis made by other stakeholders on the relevant waters.
- Microbiological analysis is performed on several samples in both production and from the water inlet. The frequency is once per year.
- This includes waste water tank analysis, potable water (chemical and biological), Legionella.
- The water discharged to sewers are mixed with the Interporto ones and are in charge of the Interporto AUA Act. This means that as for the authorities, the responsibility of compliance is for Interporto. Nevertheless, the site is now performing an annual analysis to confirm that the discharged water is conforming with legislation.
- An analysis of the Rosandra river before and after the rainwater discharge.
- The rainwater discharge is all in charge of Interporto - The 2024 analysis is available but the analysis for 2025 was not yet performed. The water is sampled after the de-greaser which is the last accessible point before the discharge to the Rosandra stream.
- The 2024 water quality test results are summarised in the "1.3.4 - g. BAT Trieste water and wastewaters quality sampling plan 2025.pptx" document. No quality issues were identified.

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

Yes

Comment

- The site provided a list a hazardous substances with current storage location and amounts in storage at last performed verification.
- The site does not use any diesel or other fuel on site, forklifts are electrical and with lithium batteries.
- Site visit allowed to confirm the presence of spill kits in specific production locations and special parking drains isolators in the parking area.

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

Yes

Comment

No IWRA identified on site and confirmed during the site tour.

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

Yes

Comment

- An annual water-related costs/revenues was provided in document 1.3.7 BAT Trieste site water costs. This is an exploded cost analysis of the water costs that the site encountered per month.
- For each actions the social, cultural, environmental or economical value generated is identified directly in the WSP.
- No identified revenues related to water identified by the site.

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

Comment
- Site did a WASH Self-Assessment
- The site provided the directive 123/2006 related to the WASH requirements on workplace. The directive requires 1 shower per 8 employees and 1 WC/sink per 10 employees. The attached count consider the employees per shift, as there are three shifts per day. The site is currently compliant with current production and future production areas that are being commissioned.

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

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

Comment
No primary suppliers included in the site catchment identified. The top10 (in weight) of supplier list indicate only suppliers outside Italy. The site has nevertheless identified them, and the amount of product that they bought to them in 2024.

The powder used in the MO product is not included in the analysis as it is supplied by another BAT site (outside Italy) and not considered as a supplier, however, it would be beneficial to the analysis include it.

Note that this analysis should be kept updated in the next audit iterations by reflecting the changes in production (currently the site will have three new production units in the near future).

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

Comment
- Six service suppliers were identified in the catchment. Only one of them identified the amount of water used. The site engaged them to get the information, but only half answered and the other half only one answered the question. For instance the canteen did not had a water meter, which was now fixed as per WSP action.
- The quantification of some of the catchment services was not completed but it is an ongoing work

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* Yes

Comment
The attached document lists the governance initiatives identified by the site so far:
- The rehabilitation of Trieste's sewer system by water supplier.
- World Water Day by water supplier - visits for public.
- Riserva regionale della Val Rosandra - two visits in the Rosandra parc on springs and streams and mills.
- Mare Nordest 2025 initiatives - an event where sustainability of the marine ecosystem are presented to the public to raise awareness.
- Piano di conservazione e sviluppo - Val Rosandra - currently not available on the website, the stakeholder was engaged about it.
- Piano di Gestione dell'Acque delle Alpi Orientali (PdGA) (2022-2027) - Oriental Alps district basin management plan as per WFD.
- Piano Regionale di Tutela Delle Acque (PRTA) Friuli-Venezia-Giulia - regional water management plan as per Italian legal framework.

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

Comment

- A list of regulatory requirements in general was identified in a document.
- The contract with water supplier SPA was provided. No specific limits of withdrawal are set. The site is not considered as a big water user. The contract with water supplier for the discharge of sanitary water in the sewers is also available.
- The AUA Interporto di Trieste - the permit to discharge rainwater to the Rosandra and some sanitary waters to the sewers is delivered to the Interporto as they are owners of the land. The report includes the specific requirements of the water discharges of rainwater (tests) and the sewers.
- Parameters of effluent-the AUA calls out for the Table 3 of the ART. 152 of the Italian legislation about effluent being discharged into the Rosandra stream. Interporto is in charge of monitoring their quality according to the document.
- The AUA of BAT Trieste specifies that if the industrial effluent would be connected to the Interporto effluent then a new AUA should be requested to approve the action.

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

Comment

A catchment water balance exercise was performed by a consultant for an area that is part of the Levante basin, encompassing Italian part of the basin. The analysis concludes that the year 2024 resulted in an important deficit between water inputs, outputs and storage (about 281 millions m3). However it is to be noted that the complexity of the underground karstic system and the multiple water sources used makes the water balance difficult to quantify. Several assumptions and approximations had to be taken in order to complete the exercise and the results are to be taken with precaution. Overall the trends indicate that the amount of rainfall is decreasing compared to the preceding decades.

To be noted that the available literature shows an overall good quantitative status for all the aquifers located in the catchment area.

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

Comment

Based on results from the 6-year monitoring period 2014-2019 and 2022 quantitative data, the following conclusions can be made related to the groundwater status of BAT Trieste's catchment area:
Chemical status:
overall good chemical status
poor groundwater quality is mainly associated with the mountainous free non-confined aquifer in the southeastern part of the catchment, associated to the Flysh Triestino aquifer, which reported exceedances in Nickel and Trichloromethane levels
the deepest layer of Bassa Pianura Isontina aquifer, along with its local free non-confined groundwater is in good chemical status, but highlighted as groundwater bodies at risk. In general, poorer water quality is typically linked to free, non-confined aquifers, which are more sensitive to pollution, especially in heavily urbanized areas.

There is no water-related challenge that would be a threat to good water quality status for people or environnement. Overall except a bad chemical status for some coastal areas located near the river outlets in the Adriatic Sea, and the municipal WWTPs.

Catchment water quality summary:
- Marine quality: macrobenthos Excellent and stable, phytoplankton - Excellent (good for two that became excellent)
- Surface water:
Rosandra: Diatoms/Macrophytes/Macrobenthos - High, ND, Good
Timavo: Diatoms/Macrophytes/Macrobenthos - High Sufficient, Bad
Chemicals good for all the six years.
TRIX: Good and stable
LIMeco index Rosandra went from High to Good.

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*

Yes

Comment

- A list of catchment IWRAs identified is attached. This includes the reason why it is considered as an IWRA, the type of IWRA, the value, the governance authority and if special protection area, if in the site, etc and the Status assessment.
- Stakeholder engagement is done through questionnaire and through scientific information. Evidence of the engagement was available (University of Trieste, Sissa international school, etc.) but no feedback received for that. NOTE: The site is encouraged to continue efforts to get relevant stakeholders feedback to improve the analysis.

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

Obs.

Comment

- Infrastructure plans from the drinking water and WWTP supplier is available. (see 1.5.1 water supplier plans)
- The attached analysis was prepared to identify the catchment water related infrastructure - and when identified, the infrastructure condition and exposure to extreme events.
- A specific questionnaire was sent, but they did not answer all questions specifically related to infrastructure as they said they wanted to sign an NDA first. Work is ongoing.

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

Yes

Comment

Identification of WASH adequacy in Italy was identified through available data (United Nations, JMP, UNICEF, etc.). The supporting documents identifies the following:
- The 93% of Italy's population has access to safe drinking water.
- 79,03% of population has access to sanitation safely managed and the rest has basic access.
- Data from Unicef and another source.
- Water supplier also provides 99.89% of compliant water to chemical and microbiological requirements. 100% of Trieste's urban population is connected to a WWTP. The loss of the water network passed from 40.7% to 38.9%.

As such, the WASH services adequacy in the catchment is considered as very high.

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

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

Comment

Stakeholders were engaged with a specific questionnaire related to share water challenges. The list of shared water challenges identified by stakeholders is the following:
- Water Scarcity
- Floodings
- Degradation of water quality
- IWRA deterioration
- WASH access
- Governance of water resources
- Normative challenges
- Vulnerability of infrastructure
- Reputational damage (in case of water issues caused by stakeholders).

However based on scientific information and further discussions with stakeholders the site identified as relevant the following challenges:
- Floodings (from heavy rains and from sea level rising, sporadically the Trieste city centre is flooded by the see that is rising).
- Water quality degradation: particularly on the coastal water nearby the two municipal WWTP - for chemical quality.
- Infrastructure vulnerability: while the water supplier is investing a lot in the infrastructure, the sewers and some other infrastructure is old and not particularly adapted to some new climate previsions.
- Water scarcity: while water scarcity is not an issue right now, the future climate change trends and pressure on possible future trends, as such it is still considered as relevant.

It seems that most stakeholders misunderstood the concept and indicated some site specific water challenges rather than a shared water challenges. It would be suitable to find a way to clarify that to the stakeholders. The current water challenges are broad and not really representative of the catchment water challenges. To be noted that the catchment is not subject to a lot of water stresses in a general way.

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

Comment

Some initiatives for the different water challenges were identified within the shared water challenges document and designated as opportunities. These include governance initiatives (Piano di Gestione delle Acque FVG) but also some more specific projects like the construction of a new on-site WWTP.

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

1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes
Comment	Risk analysis is available in the attached document. Currently no high risk identified by the site. The risk and opportunities (see 1.6.2) are linked one to the other and prioritised as per risk level. The risk assessment includes the assessment of the different requirements of 1.7.1. Risks like leaks in site water pipelines, non-compliances in waste water parameters (both sewage and to incinerator) are considered as medium but are the highest ranking risks.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	Opportunities related to each risk are identified in the table uploaded in 1.7.1.	
1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*	
1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	Identified governance best practices: - Go to universities to share site sustainability and water stewardship activities; - Engagement of stakeholders; - Routine water governance reviews; - Partnership with sustainability organisations (NGOs, governments or research institutions)	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	Identified water balance best practices: - Rainwater harvesting - Water recycling and re-use - recycling water used by the cooling towers - Promoting water efficient diet choices in the canteen	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Identified water quality best practices: - Using eco friendly chemicals - On-line biomonitoring of effluent data - Install an on-site waste water treatment plant for treatment of industrial waste water (currently incinerated) - Real-time water quality monitoring	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	Identified water quality best practices: - Tree planting campaigns to reduce flooding risks and increase water infiltration - Promote sustainable fishing in the Adriatic Sea - Buffer Zone restoration/maintenance around rivers	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes

Comment	Identified WASH best practices: - Installation of educational posters in employee restrooms with simple water-saving tips. - Water efficient fixtures. - Refugees and Migrants Support - providing clean water and sanitation in temporary shelters - Providing free water efficient aerators to employees in order to decrease water consumption at employees home.

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

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

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

Yes

Comment

A commitment in three languages was written; Slovenian, Italian and English that covers the requirements of indicator 2.1.1 was shared on the BAT Italia website at the following link: https://www.batitalia.com/sostenibilita-e-responsabilita/il-nostro-approccio-esg

Internally it was shared on all billboards around the site (picture of the canteen one) and per email. Additionally the commitment was shared by email to all stakeholders.

Signed by the Area Operations Director Italy and Adria - the management representative which stands over the Facility Director.

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

Yes

Comment

The BAT Trieste list of responsible personelle for water management and AWS is indicating that the EHS Manager - RSPP - Enrico Vermi is responsible of all the Environmental & Health Safety conformity and compliance obligations.

A document called EHS-A-4-2023 will track all the legislation and compliance obligations including those related to water. At the moment only the Legionella testing is indicated as there are no obligations related to the site effluents or incoming water.

The site is taking municipal water from water supplier and discharging in the municipal sewers. As such, the contracts with water supplier are the only relevant legal documents and are not requesting any specific monitoring activities or obligations (the water discharged is only sanitary water and not industrial water).

The rainwater and cooling water discharged into the rain system is managed by Interporto which is in charge of monitoring it as per the AUA provided by the site.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.* Yes

Comment The site produced a separate document describing the strategy, mission, vision and goals of their water stewardship plan as indicated below:

Mission: Build image of the site as a sustainable and eco-friendly one. Ensure the responsible use of water throughout our operations by integrating sustainable practices, provide necessary human and financial resources and also tools for achieving the goals.

Water vision: Our vision is to implement innovative, efficient, and environmentally responsible practices that minimise water consumption, reduce waste, and ensure the longterm availability of water for future generations. We strive to integrate water conservation into every aspect of our operations, from production processes to community partnerships. Through continuous improvement, transparency, and collaboration with stakeholders, we envision a future where our factory operates in harmony with the environment, contributing to global efforts in safeguarding water resources and promoting a circular economy.

Water strategy:
- Implement solutions to reduce water consumptions and improve water efficiency
- Ensure compliance with local and international water regulations
- Identify risks related to water scarcity, pollutions, climate change and IWRAs and develop mitigation plans
- Engage relevant stakeholders in promoting responsible water use
- Provide access to clean drinking water and high sanitary conditions for everyone
- Raise awareness about sustainable water practices

General Targets for 2025: -35% of water withdrawn and 30% of Water recycled and AWS certification.

2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Obs.

Comment The attached WSP is meeting the requirements of the 2.3.2 indicator and
Examples of current ongoing projects:
- Mapping of the water balance and identification of missing water meters to be installed. For instance cooling towers, canteen, sanitary water, New Department, new production department, etc. The goal is to identify the specific water use in order to decrease water use. Also, creation of own WWTP to avoid sending the industrial water to third party for treatment.
- Quality: make a water quality testing plan, check the WW tank for leakage, quotation for the commissioning of a on-site WWTP for treating the industrial waste water.
- IWRAs: a clean-up event was organised in the Val Rosandra natural area nearby the site. 190 kg of litter were collected by 19 BAT employees.
- WASH: self-assessment WBCSD Wash Pledge - WaterAid. Site did a self-assessment of their WASH access.

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

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

Comment	The risk identified in 1.7.1 includes water supply stop but at a low/medium level. This was discussed with the water supplier to identify if it was possible for them to provide alternatives in case of supply stop. Both inlet quality issues and supply stop are considered as low risk in the risk analysis but it is indicated as opportunity to address the possible issue with the water supplier. The site contacted the supplier to discuss about possible implementation of live metering in the whole plant and their identification of leakage.

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

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

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

Comment

Good catchment governance actions from the site:
- Water stewardship internal awareness training to employees
- World Water Day - awareness email shared with all employees
- Including the Natural Plan in the site Emergency Response Plan to completely include those external risks in the EMP.
- AWS Standard vs. ISO - Presentation at the University of Trieste to present the AWS journey of the site and the differences between AWS and the ISO 14001 certification.
- Benchmarking and best practices with stakeholders to strengthen site water stewardship efforts.
- Meeting with water supplier at the site (two meetings).
- Internal audit of the kitchen to assess water management in the canteen. Feedback requested to include water stewardship activities in the canteen checklists (HCCP). Awareness panel on water saving were also added to the kitchen sinks too. Creation of menu with low water consumption.
- Low water aerators distribution to employees for them to install them at home.
- Training of the correct use of spill kits to Interporto (stakeholder, owner of the land and neighbouring company).

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* ✓ Yes

Comment

- Italian laws to respect the water rights were identified by the site.
-There is no identification of water rights not being respected by the site, especially knowing that they purchase water from municipal supplier and as such, are subject to their management in the same way as other users.
- Site is thinking to work with a NGO on water access to the migrants taking the "Balkan Route".
- No waters rights other than the one in 3.2 are identifiable in the site and therefore no measures are necessary.

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

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

Comment

- Currently the rain waters discharged to the Rosandra stream are regulated by the AUA authorisation of the Interporto company, as all the rainwaters on site are gathered and discharged together. As such, it is the responsibility of Interporto to monitor the effluent water quality as submit to the authorities (ARPA) as indicated in the attached AUA.
- Nevertheless, the site maintains a water testing plan and could provide the related test reports that were reviewed during the audit.
- The document "2.2.1-3.2.1_-_b._BAT_Trieste_list_of_responsible_personelle_for_water_management_and_AWS_implementation" lists the legal responsibilities of employees on site.
. The document "2.2.1-3.2.1_-_a._BAT_Trieste_water-related_legal_register" lists the water related legislation that the site needs to comply with.

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.* ✓ Yes

Comment	No water rights part of legal and regulatory requirements for other including indigenous peoples were identified.	
3.3	*Implement plan to achieve site water balance targets.*	
3.3.1	*Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*	Yes
Comment	Note that while the site is still at the premises of their water stewardship journey and as such, did not complete yet a full year a stewardship activities. The status of progress is monitored within the WSP. Here is the progress of the water balance targets: - Awareness campaign on water saving to the kitchen - Low water consumption menu on the 23rd of July - Installation of new water meters - is still ongoing 10% - request of quotation for site WWTP. - aerators installed and proposed to the site.	
3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Obs.
Comment	Water scarcity is not a shared water challenge. However, the site set up some annual targets for the volumetric total use for some specific projects are monitored. It was however discussed that since the site is currently in expansion (two additional production areas are planned (New Department and NRT); setting a target on total volumetric consumption decrease is not be the best solution at the moment.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	Not applicable, no reallocation of water.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes
Comment	Completed activities related to water quality targets: - Mini audit to approve the water-related aspects on site from third party. - Install spill kits and manhole covers and sump trays within the factory (see maps also to add to step 1). - Conduct a spillage simulation to assess the process efficiency. - Replacement of chemical floor cleaners with biodegradable (currently 90% changed with a goal of 100%). - Monitoring Plan of all water outputs and inputs (completed at 80%). - Rainwater quality testing before oil interceptor handled by Interporto and compare with the results of Interporto test after the oil interceptor (not a legal monitoring requirement) (completed at 60%). - Leak test for wastewater tank - 80% (waiting for test report of third party consultant)	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes

Comment - Water quality is not a shared water challenge as the Rosandra stream is considered in good chemical quality, in addition only the site rainwater is discharged into the stream.
- Sanitary effluents are discharged to the sewers and treated by the municipal WWTP then discharged to the Adriatic Sea.
- The site industrial waste water are incinerated and therefore not discharge in the aquatic environment.
The site is thinking of commissioning an on-site waste water treatment plan to treat this water, if this projects is completed, the site will have to re-assess the situation.

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

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

Comment - Clean-up event in the Rosandra river catchment in the nearby woods of San Dorligo della Valle. 19 employees from BAT were involved in 21st of June 2025. The area is located in the "Balkan route" where refugees are passing by to go to northern Europe and various rubbish is left behind.

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* Yes

Comment - The self-assessment of WASH was performed by the site. In addition the site provides the necessary showers and WC. Feminine Hygiene products are provided for free in the bathrooms and water fountains can be found around the offices and in the cantine. Water dispenser are located in specific rest areas for all employees.
-

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* Yes

Comment No evidence that the site is impinging on the human right to safe water and sanitation of communities was observed during the site tour. In addition, the fact that the water is purchased from the municipal supplier is putting the site at the same level as other municipal water users.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* Yes

Comment Actions towards indirect water use:
- Water meters were just installed in the canteen to identify the water consumption of the canteen itself.
- A "low water consumption" meal was planned by the site with the canteen stakeholder in order to make a first step of consuming less water (10% less than a normal meal) this is planned the 23rd of July.
- As indicated in indicator 1.4.1 there is no primary inputs supplier located within the site catchment.

3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	Evidence of communication with canteen for both the low water consumption meal and the change of chemicals used for cleaning with more biodegradable ones was reviewed during the audit.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	Feedback from a questionnaire sent to the water supplier with specific data, feedback on infrastructure requested to the water supply and water treatment plan owner; However so far the stakeholder refused to provide some of the requested information (specifically the vulnerability of some infrastructure). The site is confident that more information will be shared as an ongoing NDA will be signed between both parts.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	Identified best practices identified and implemented in the water stewardship plan: - Implement incentive actions with stakeholders to promote water stewardship: a meeting with all identified stakeholders was held at the site to present the site AWS journey. - Call for action among universities - engage academic institutions to raise awareness and promote sustainable practices : site presented their AWS standard and the differences with the ISO 14001 to a classroom of engineering students at the University of Trieste. - Installation of educational posters in employee restrooms with simple water-saving tips - Water Conservation Training – Educate staff on efficient water use and encourage sustainable behaviors - distribution of low flow aerators to employees for free to raise awareness on water consumption and decrease the amount of water used at home.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Identified best practices identified and implemented in the water stewardship plan: - Facility-Wide Water Balance Mapping and Optimization Strategy: Installation of a remote water consumption monitoring dashboard provided by our water supplier - Water Recycling & Reuse – Implement closed-loop systems to treat and reuse process water, reducing overall consumption - Wastewater Treatment Plant project (WWTP): site is studying the treatment of their industrial effluent on site in order to be able to re-use it in specific applications. Currently the industrial effluent is stored and then sent out to a service supplier which treats it in a separate location. - WASH Facility Optimization through Water-Efficient Fixtures - Installation of aerators in bathroom taps - Recycling water used for cooling towers (closed loop cooling towers but with humidification of the air used as coolant).	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes

Comment	Identified best practices identified and implemented in the water stewardship plan: - Emergency Response Plans – Develop plans for water contamination incidents or equipment failures. - Installation of spill kits, manhole covers, and sump trays for safe spill management - Spill kit simulation training for hazardous substance spills - Integrated Water Quality Monitoring Program - Creation of detailed water sampling plan for the factory - Leak Detection & Repair Programs – Regularly inspect and maintain pipelines and equipment to prevent water loss. - Leak test for wastewater tank;	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes
Comment	Identified best practices identified and implemented in the water stewardship plan: Buffer Zones – Maintain vegetation buffers around rivers, lakes, and wetlands to filter pollutants - Clean-up event in the woods of San Dorligo della Valle around the Rosandra river, by cleaning up the river banks the litter and pollutants related to it will not be carried away by runoff water.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Identified best practices identified and implemented in the water stewardship plan: Workplace Hygiene Standards-Mandating clean sanitation facilities and regular cleaning in workplaces. - Self-assessment and employee survey on WASH on-site	

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	✓ Yes
Comment	In the WSP the column R to V are dedicated to the evaluation of each targets. This is done every quarter except if an actions is already completed. Example: - Installation of spills kits around the site: currently 70% of the fixed target (indicated in an environmental audit report requested by the site) were installed. The last 30% are pending delivery of the materials. - Commissioning of a re-use system for the water cooling towers - 90% Commissioning completed but site wants to wait until the end of the year to see if the planned savings are effective (15% compared to previous year). The contribution of each actions to an AWS outcome is indicated in the column Y with explanation in column Z. Note that the site properly started their water stewardship activities beginning of 2025, and while many targets and data could be already evaluated for year 2024, some actions still require the complete year to be evaluated and will be evaluated during the next audit iteration.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	🔍 Obs.
Comment	Value creation for each action is indicated in the WSP column W and X. The type of value creation (economical/Environmental/Social) is indicated and an explanation is added on the column X.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	✓ Yes
Comment	The actions that were considered as creating value in the catchment are described in the same value creation column than in 4.1.2. For instance: - The AWS physical event with all stakeholders invited at the site: the event created social value through the transparent sharing of the asp awith stakeholders and the collection of feedback to improve future actions. A moment of dialogue and listening that strengthens trust participation and shared commitment. - The clean-up action in nearby Rosandra valley: Reducing pollution in natural environment and demonstrating corporate responsibility by cleaning up the woods nearby factory in a high polluted area . - Presentation of AWS vs ISO 14001 to University of Trieste students: Providing students with insights into AWS standards, thereby increasing awareness of sustainable water management in future professionals and allowing them to share feedback and suggestions. - Meeting and benchmarking with industrial stakeholder: promoting the exchange of the best practices with a stakeholder and raising awareness on water stewardship practices.	
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	
4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	✓ Yes

Comment	- No water related incidents were reported in year 2024. This is confirmed by an email of the EHS manager and the relevant EHS team. - The BAT Trieste Internal procedure for reporting near misses and incidents is attached to support the indicator. - A monthly EHS meeting is held to review the incidents that occurred every month. - An annual meeting was done for year 2024 with the health incidents - if any environmental issue incident would happen it would be included in that review. - The incidents are recorded in a "Near Miss" document and include a description of incident and root-cause analysis. Then reported to the the EHS team which record a sheet with corrective actions (if necessary).	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Yes
Comment	- Stakeholders were invited to a meeting on-site with the AWS journey and present results. - One project for each AWS outcome was presented to the stakeholders. The consultation is clear and sufficient especially noting that the site did not complete a full year of water stewardship year. 4 of the 13 stakeholders responded to a questionnaire requesting feedback on the presented slides. The complete WSP was sent out to all the stakeholders that attended the meeting with further link to the same questionnaire in case they wanted to anwser (for those that did not).	
4.4	*Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*	
4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	Yes
Comment	- Note that the site did not complete a full year of water stewardship yet. - The comments and lessons learnt are indicated in the column AA of the WSP. - The intentions is to create a new WSP for 2026 at the end of 2025 that would include the long-term actions that are in the plan plus the unfinished actions. The Lessons learned column would help to identify any changes required to the building of next year. To be assessed when the next version of the WSP will be completed.	

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	*Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*	
5.1.1	*The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*	Yes
Comment	- The site water-related organisational chart was sent to all the stakeholders along with explanation of the team roles - however for confidentiality reasons the name of the employees was not disclosed, only the role. - The RSPP (Enrico Vermi) is in charge of all the EHS compliance of the site as per Italian legislation.	
5.2	*Communicate the water stewardship plan with relevant stakeholders.*	
5.2.1	*The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.*	Yes
Comment	- The complete WSP plan was sent out to all stakeholders by email as per attached evidence. The contribution to the AWS outcome is included in the WSP. - In addition, a presentation was held with all the stakeholders that attended (all were invited) and presented the different actions that were ongoing.	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*	
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	Yes
Comment	- A Water Stewardship Report 2025 was shared on the BAT Italia website https://www.batitalia.com/content/dam/endmarkets/it/it/download/sutainability-and-responsibility/BAT_Trieste_Water_Stewardship_Report_2025_-_ITA.pdf This includes a summary of the water stewardship relevant actions (mostly those completed) and their performance and lesson learned.	
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*	
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	Yes
Comment	- A Water Stewardship Report 2025 was shared on the BAT Italia website https://www.batitalia.com/content/dam/endmarkets/it/it/download/sutainability-and-responsibility/BAT_Trieste_Water_Stewardship_Report_2025_-_ITA.pdf This includes the shared water challenges identified through stakeholders engagement.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes

Comment	The following efforts were identified: - The memorandum that can be found within the stakeholder list document records all the communication efforts that the site identified. Engagement with public-sector agencies can easily be identified along with a short summary of the content of the engagement. - Communication the municipality of San Dorligo della Valle. The mayor of San Dorligo della Valle came to the AWS event organised by the site. He also came to visit during the clean-up event. - With the City of Trieste: an assessor of the Municipality of Trieste joined the AWS event on site.	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	No water-related compliance violations identified in 2024 as confirmed by the EHS responsible and team with written confirmation.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	See 5.5.1.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	No water-related violation identified. See 5.5.1. 2.2.1 procedure called "BAT Trieste environmental incidents and non-conformities management" will detail the person to contact in case of environmental incident with significant risk. The document clearly indicate to communicate with the minitry of environment, the municipality and the region.	

Previous Findings

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