

## EU CODE OF CONDUCT ON RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES

*A common aspirational path  
towards achieving sustainable food systems*

### Annual Report – Natural Mineral Waters Europe

Name in full + acronym	Natural Mineral Waters Europe (NMWE)
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N° in the transparency register	562370525222-50
Date of signature of the Code	05 July 2021
Step of the food chain represented (ex: primary production, production, processing, trade, retail, ...)	Primary production, production
Who do you represent? (e.g., number of members, companies, SMEs)	Over 500 producers (mostly SMEs) of natural mineral and spring water via 24 associations in 21 EU and 2 non-EU European countries and 7 direct corporate members

NMWE endorses the aspirational objectives set out in this Code. In the past year, it undertook the following actions.

- *to promote and disseminate this Code with(in) their constituency/ies*

In line with our commitment to the EU Code of Conduct, we have undertaken numerous activities to promote and disseminate the Code within our constituency.

The Code has become a strategic centerpiece of NMWE, guiding our activities in the area of environment and sustainability.

To ensure awareness and understanding of the Code, we have integrated it into our internal processes. It serves as a framework for NMWE's Environmental and Sustainability Committee meetings, presenting and discussing the advances made on the Code commitments.

The importance of the Code was reiterated at board meetings and our annual meeting, where our membership actively participates. We ensure that the Code's commitments are taken into account during the yearly budget preparation, with appropriate allocations in the environmental and sustainability chapter to address the needs arising from our Code commitments.

While we did not conduct specific workshops or events focused solely on the Code, we take every opportunity to present NMWE's commitments and related activities to stakeholders, internal and external. This included:

- International Association of Hydrogeologists (IAH) 3rd International Multidisciplinary Conference on Mineral and Thermal Waters, Caserta, Italy, June 2022
- National Conference of Water and Beverage Producers, Karpacz, Poland, October 2022
- Portuguese Association of Natural Mineral and Spring Water Industries (APIAM)'s Workshop on reusable packaging, Lisbon, November 2022, in the presence of the Portuguese Environment Agency, and many industry associations from the Beverage Value Chain.
- Future of Plastics conference, Athens, Greece, February 2023, in the presence of the Greek Ministry of Environment and Energy
- World Water Day celebration by the Croatian Association of Beverage Producers (GIUPPH), March 2023, Zagreb, with the support of the Croatian Ministry of Agriculture and in the presence of the Croatian Environment and Energy Efficiency Fund.
- Environnement et Emballages Plateforme, Luxembourg, April 2023

Whether speaking at member-led meetings or engaging with organizational partners in Brussels, we consistently highlight our commitment to the EU Code of Conduct among our activities, emphasizing its role in guiding our environmental initiatives and sustainability practices.

- *to encourage their members to align their sustainability actions and/or business practices to the aspirational objectives and targets of the Code and invite them, on a voluntary basis, to adhere to this Code, as appropriate*

The comprehensive integration of the Code into our organization's documents and presentations has created a culture where our membership is well aware of the Code's aspirational targets and actively endorses them. We have observed a growing awareness and engagement among our members regarding our activities derived from the Code of Conduct. The dedication and involvement of our corporate members who have voluntarily adhered to the Code further demonstrates the commitment of select members to align their practices with the Code's targets.

- *explore the possibility of developing sector-specific tools and resources in support of this Code*

NMWE is committed to aligning its actions with the aspirational objectives of the EU Code of Conduct. The association has identified four areas of commitment that correspond to the aspirational objectives of the Code:

1. Our decarbonisation commitment aligns with the no. 3 aspirational objectives of the Code.
2. Our biodiversity commitment aligns with the no. 6 aspirational objectives of Code.

3. Our water efficiency commitment aligns with the no. 4 aspirational objective of Code.
4. Our packaging circularity commitment aligns with the no. 4 aspirational objective of Code.

NMWE has undertaken significant efforts to develop tools and resources to support these commitments and advance sustainability in the sector.

### **Decarbonisation Commitment**

NMWE has undertaken a significant step towards decarbonisation by conducting a sectorial decarbonisation study. This study, nearing completion, serves as the first step on the sector's path to carbon neutrality by 2040. It highlights and promotes the right actions to be taken, especially for members with limited resources. The study will include a library of impactful interventions, encompassing individual member actions, collaborative efforts in decarbonising logistics and packaging, and identifying enablers and potential carbon removal strategies. It will be a valuable tool for engaging with stakeholders, to explain the sector's decarbonisation challenges, and identify necessary steps but also to engage with suppliers to encourage environmentally friendly practices upstream.

New specific actions, such as identifying and addressing gaps in legislation, standards, and knowledge, developing a communication platform on best practices, an LCA carbon calculation tool, and decarbonisation guidelines for companies, are currently under consideration for future implementation. These plans will be further evaluated in the context of the outcomes of the decarbonisation study, ongoing discussions with stakeholders, and the availability of resources.

### **Biodiversity Commitment**

NMWE has taken significant strides in promoting biodiversity conservation within the sector. The association has collaborated with the International Union for Conservation of Nature (IUCN) to review member policies and practices linked to biodiversity and water stewardship. This collaboration has resulted in the development of a practical framework for monitoring biodiversity and implementing water stewardship. NMWE has collected extensive best practices in the field of biodiversity, which are accessible through the [interactive map available on the NMWE website](#). The association actively participates in the European Business and Biodiversity Platform, leveraging its resources and encouraging member engagement to benefit from the platform's webinars and tools.

### **Water Efficiency Commitment**

NMWE was committed to report biannually on water use ratio (WUR) at factory level, and the next report is planned to take place in the second half of 2023, to be reported on in 2024. The WUR report from 2021 showed that the WUR is very low (1.64 for all plants) and has been consistently declining since 2006 (2.02).

While it would be interesting to document whether this declining tendency continues, it seems that two things are necessary to ensure that the NMWE's water efficiency commitment has a relevant positive impact on environment: first, to draw conclusion from what the WUR reports reveal and develop a targeted action to further decrease the WUR. Anyway, a further decrease of WUR can only have marginal impact on the environment. Therefore, the second and more important necessary action is to expand the commitment to make it more meaningful for the environment. Given the constraints of NMWE's budget, the aim is to prioritize this action over another WUR report.

Thus, NMWE aims to go beyond simple reporting on factory-level WUR and adopt a more comprehensive approach to water sustainability. To achieve this, NMWE has designed and is preparing a workshop with water experts to discuss key considerations, measurement approaches, and monitoring frameworks specific to natural mineral water extraction and production. The outcomes of this workshop will guide the reformulation and delivery of NMWE's commitment on water use, considering industry expertise and best practices. These efforts aim to establish a more robust and meaningful approach to water conservation and environmental impact reduction.

### **Circularity Commitment**

NMWE remains committed to promoting packaging circularity within the sector. Collaborating with UNESDA (Soft Drinks Europe) and Zero Waste Europe (ZWE), the association has developed a paper outlining the minimum requirements for well-designed deposit and return systems (DRS). NMWE actively advocates for the implementation of DRS and emphasizes its role in achieving high collection rates of materials with high purity. As part of these efforts, NMWE has created an interactive [DRS map on its website](#), showcasing the progress and locations of DRS implementation. The interactive map serves as a valuable resource for members and stakeholders, facilitating their understanding and engagement in promoting packaging circularity.

- *continue to engage in dialogue with other food chain/systems actors and EU and international policymakers to forge (new) relationships, exchange good practices and discuss challenges encountered, learn from each other (studies, projects) and create better mutual understanding, and identify opportunities for collaboration and potential partnership.*

NMWE remains actively engaged in dialogue with other actors in the food chain/system and policymakers at the EU and international levels.

On the topic of circularity, NMWE has engaged with DRS systems in several countries, industry partners representing other beverage sectors, representatives of the packaging supply chain such as FEVE, PETCORE or PRE, civil society representatives such as Zero Waste Europe, Changing Markets Foundations, or Reloop, and policy makers.

On the topic of biodiversity and water stewardship, NMWW has engaged with IUCN, WWF and a number of other institutes and universities to shape the sector's respective monitoring frameworks.

On decarbonisation, NMWE has been in dialogue with supply chain partners about further update of the product environmental footprint category rules.