



EU CODE OF CONDUCT ON RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES

*A common aspirational path
towards achieving sustainable food systems*

2026 Annual Report



Natural Mineral Waters Europe
Natural Mineral & Spring Waters



General information

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 25 associations in 20 EU and 3 non-EU European countries and 7 direct corporate members

NMWE endorses the aspirational objectives set out in the EU Code of Conduct on Responsible Food Business and Marketing Practices.

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Highlights of NMWE's EU Code of Conduct

2026 Annual Report



NMWE launched SkySource, a research project dedicated to collecting, and interpreting data on TFA contamination in rainwater, to better understand its sources, patterns, and temporal development across Europe

NMWE launched [Sources for Nature](#), a two-year project developed with IUCN to pilot the sector's biodiversity guidance, bringing together seven companies operating at 17 locations and two national associations across 10 countries



NMWE supported smaller companies in responding to sustainability reporting requirements by promoting the VSME-compliant [Workable Method](#) tool and customising it to reflect the specificities of the sector

NMWE published, disseminated, and promoted the [DRS Playbook](#) and together with its partners launched the development of the next biennial PET Market in Europe – State of Play report.



1. Advancing tools and resources for the sector

NMWE has continued to dedicate significant efforts to **develop tools and resources** to support its commitments and advance sustainability in the sector.

Sustainable water management commitment

Following the publication of the **European Water Resilience Strategy** (EWRS), NMWE focused on leveraging its quality expertise and focus on water stewardship to support the implementation of the Strategy and ensure that the natural mineral and spring water sector can contribute constructively to the emerging policy debate.

In line with the EWRS's goal to work on preventing pollution at source and tackling PFAS, NMWE aspires to advance knowledge about the sources of trifluoroacetic acid (TFA). This short chain PFAS is being detected globally, even in the most pristine environments, and is a concern for the quality of underground water resources.

Thus, NMWE has partnered with the Norwegian Geotechnical Institute and SGS Fresenius to launch the **SkySource project**. Under the project, precipitation sample will be collected across more than 60 different European watersheds over a one-year period and analysed. The objective is to assess atmospheric deposition as a primary source of TFA and look at possible measures to limit TFA infiltration in groundwater.

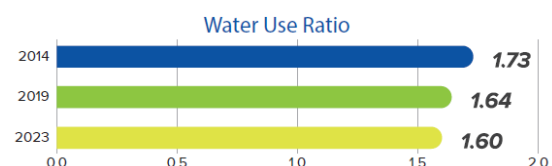
In October 2025, NMWE organised a stakeholder **field trip** to Spadel's catchment area in Spa, bringing together senior representatives from the EU institutions, environmental NGOs, and the food sector. The discussions focused on two key pillars of the EWRS: restoring healthy water cycles through nature-based solutions and improving industrial water efficiency.

To strengthen the sector's technical contribution, NMWE established an **internal**

expert group on water resilience. The group advised NMWE on its engagement under the EWRS and initiated work on a Sectoral Compass for Sustainable Watershed Management.

NMWE also participated in the first **European Water Resilience Forum** in December 2025 and co-moderated FoodDrinkEurope's **event in the European Parliament** dedicated to water resilience in the food sector. In the first half of 2026, NMWE focused primarily on advocating for **maintaining the high level of protection provided by the Water Framework Directive**, a focus expected to continue in the second half of 2026.

Alongside the wider water stewardship context, NMWE has been mapping and encouraging water efficiency action among its members. While such action has until recently been driven voluntarily by individual companies, recent instances of collective action at the national level, such as the adoption of the EWRS reduction target of 10% or national water efficiency guidelines, will be disseminated and leveraged by NMWE to support the sector in its continuous improvement in water efficiency.



The **interactive map of the sector** is now fully operational, allowing users to view the sector's geographical distribution against hydrological layers such as WFD river basins or HydroBASINS. The tool will allow public and private stakeholders to engage in water

stewardship with the sector based on companies' locations.

Biodiversity commitment

Following the publication of the biodiversity recommendations developed with IUCN in May 2025, NMWE focused on **promoting the use of this guidance** among its members.

The English-language foldable brochure containing a comprehensive checklist was translated into four other languages: Portuguese, French, Spanish and Polish.

In order to move from a static guidance document to dynamic piloting and a true community of practice, NMWE launched a new project, **Sources for Nature**, to pilot these recommendations. Equipped with a standalone [website](#), the project has brought together seven companies operating at 17 locations and two national associations, altogether in 10 countries.



Throughout the 24-month project, participants will systematically implement the recommendations, attend webinars, and share learnings with their peers under the oversight of IUCN experts. The project was **launched on 31 March 2026**; participants are currently implementing the first of the four phases. The project also reinforces NMWE's broader water stewardship work, recognising the close relationship between healthy and resilient water catchments and biodiversity.

The cooperation between NMWE and IUCN has successfully translated into action at the national level. In 2026, as a result of collaboration with IUCN-MED, ANEABE, NMWE's Spanish national association, has finalised its own biodiversity **project tailored to the Spanish context**.

Decarbonisation commitment

In previous years, NMWE reported on the finalisation of the sector's decarbonisation report and the launch of the sectoral environmental footprint assessment tool. With these basic tools operational, NMWE focused on exploring where under-equipped companies might need to collect, process, and communicate LCA data.

The area identified was sustainability reporting, particularly for smaller companies outside the scope of CSRD, still required by their customers, e.g. retailers, to report. To address the practical challenge of companies facing a large number of mutually incompatible sustainability questionnaires, NMWE actively supported and promoted the adoption of **Workable Method – a widely accessible, non-profit, VSME-compliant sustainability reporting tool** by the food and drink umbrella federation FoodDrinkEurope. NMWE promoted this tool at its committees, participated in the training session and currently is in the process of customising the tool's manual to reflect the specificities of the companies in the sector.



By helping smaller companies respond efficiently to sustainability information requests, NMWE aims to strengthen

environmental data flows across the supply chain and support future decarbonisation efforts.

Circularity commitment



Following the **publication of the Deposit Return System (DRS) Playbook** in September 2025, NMWE focused on its **dissemination and implementation**. The Playbook has been physically printed and promoted at meetings and field visits. It was distributed to key legislators from the European Parliament and Council and provided to national associations for local use. A French translation is under

preparation. NMWE continued its active **participation in the European Alliance for Best-in-Class DRS**, participated as a speaker at the **first EDRSA conference** and organised a **dedicated DRS session** during its Annual Meetings. The association also supported members facing **national policy discussions on DRS** implementation and devoted considerable effort to the implementation of the Packaging and Packaging Waste Regulation, recognising that well-designed DRS remain central to achieving high-quality packaging circularity.

On the data collection side, NMWE conducted its **annual circularity survey**. It indicated an increase in the incorporation of recycled content, especially in previously underperforming countries, arguably in connection with the SUPD-mandated target of 2025. However, it also revealed serious aggregated data shortages in many countries, as member associations attempted to increase the certainty of the values submitted annually. NMWE will address this shortage of quality data in the upcoming periods.

Finally, in the first half of 2026, together with UNESDA, PETCORE EUROPE and PRE, NMWE launched the development of the biennial **PET Market in Europe – State of Play** report, with the aim of providing a robust picture of circularity in the PET sector in Europe and its outlook.

2. Supporting actions – promote and engage

By signing the EU Code of Conduct, NMWE also committed to:

- promoting and disseminating this Code within its constituency,
- encouraging its members to align their sustainability actions and/or business practices with the aspirational objectives and targets of the Code and inviting them to adhere to this on a voluntary basis, as appropriate, and
- continuing 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 partnerships.

Internal promotion

The EU Code of Conduct continued to be the **strategic centrepiece** of NMWE's environmental and sustainability action:

- it provided the framework for 6 meetings of NMWE's Environmental and Sustainability Committee,
- it was integrated into project rationales, ensuring that new sector initiatives are consistent with the aspirations of the Code, and
- it supported budget planning, especially within the environmental and sustainability chapter.

Over the reporting period, NMWE actively promoted the Code at:

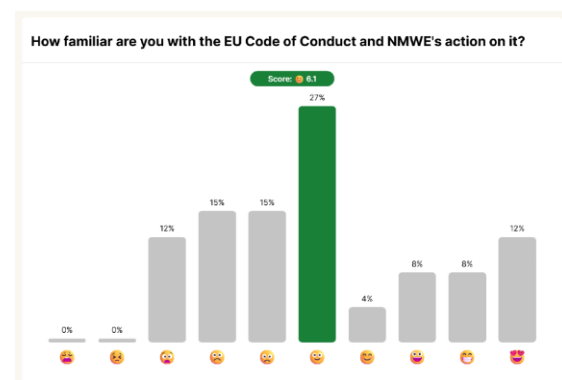
- international conferences (such as FoodBev's 23rd Global Water Drinks Congress, November 2026, Barcelona) and meetings of national member associations in various countries and the global sectoral association (International Council of Bottled Water Associations),
- NMWE's Annual Meetings in Ljubljana (June 2026), and
- internal board-level and governance meetings.

In August 2026, NMWE will launch an internal process to reinvigorate the activities

under the Code to better match evolving reality and legislative environment.

Alignment among members

NMWE **members' awareness of and alignment** with the Code remains constant. Certain stagnation in terms of awareness can be assigned to turnover among member representatives.



Members' alignment with the Code is generally dictated by the societal, economic and legislative environment in which they operate. For example, while we have noticed decreased interest in the topic of decarbonisation, the topic of water resilience has received more attention from previously less interested members. Traditionally strong alignment on circularity commitments can be assigned to existence of mandatory targets (collection, r-content) and imminent legislation (SUPD, PPWR, CEA), whereas biodiversity remains a topic

widely driven by front-runners and requires systematic promotion by NMWE.

Especially well-resourced members routinely promote NMWE's tools among their membership and implement national follow-up projects in their own countries.

Engagement with other stakeholders

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

Internal promotion activities described above often involved external stakeholders – internal committees, annual meetings, members' events, field trips. When interacting with stakeholders bilaterally, NMWE's Code of Conduct commitments were often reminded and presented as a strategic framework of the sector. Finally, specific activities, such as the water protection advocacy campaign, the SME sustainability reporting tool, or the Sources for Nature project, are by design carried out together with other stakeholders of the food system.

Conclusion

NMWE has further progressed on its commitments under the EU Code of Conduct across all four areas of action, yet this is happening in an environment of evolving political priorities and expectations. The political prioritisation of addressing environmental challenges that was present at the time of the original EU Code of Conduct introduction gave way to a focus on the stagnating European economy and geopolitical instability. As a result, the policy environment is less able to provide the necessary enablers for the sector to increase its sustainability credentials.

Nevertheless, the sector remains committed to continuous improvement despite these headwinds. NMWE will continue operationalising these ambitious aspirations and will continue equipping its members — especially SMEs — with practical tools and resources that will enable them to contribute to these shared goals.

In Brussels, 12 August 2026



Patricia Fosselard, Secretary General, Natural Mineral Waters Europe

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Annex: Updated NMWE's EU Code of Conduct commitment

The update of autumn 2024 maintained the original structure of the report: four areas, each with a sectoral aspiration and a concrete action from NMWE. The four areas align with aspirational objectives of the EU Code of Conduct.



Sustainable water management

Aligns with the aspirational objective no. 4 of the Code

Aspiration

Drive sustainable water management in the sector, on the one hand, by promoting efficient use of water in member operations and supply chain, and, on the other hand, by promoting water stewardship as engagement beyond factory gates. By this, NMWE aims at positive impact on water balance, water quality, water-related ecosystems, extreme weather events mitigation, encompassing social, cultural, and economic value of water.

Concrete action

NMWE will

- support companies by facilitating collaboration and providing tools such as monitoring, benchmarking, KPI, guidance, or best practice database
- carry out a study at least every two years to measure and report on water usage in the sector's operations, gradually transitioning to a wider water stewardship context



Biodiversity

Aligns with the aspirational objective no. 6 of the Code

Aspiration

Actively contribute to preserving and restoring biodiversity in catchments of our operations, with results reported using an accepted methodology by 2030, as part of our approach to water stewardship.

Concrete action

NMWE will

- in dialogue with scientific experts and academia, define and test biodiversity indicators to be used by natural mineral and spring water producers, incl. SMEs
- promote the use of the developed indicators to measure and monitor the state of biodiversity by the companies in the sector
- put in place a reporting framework, establish a community of practice for exchange and capacity building, and develop tools to support national associations and companies
- support dialogue with relevant stakeholders to facilitate involvement of its member companies in nature preservation and restoration projects



Decarbonisation

Aligns with the aspirational objective no. 3 of the Code

Aspiration

Drive the sector towards net zero by 2050 in all scopes, with decarbonisation of scopes 1 and 2 by 2040. As a priority by 2030, support members in transition to low-carbon energy.

Concrete action

NMWE will

- provide companies in the sector with tools to measure their carbon footprint with a consistent robust methodology
- gather knowledge on the path to decarbonisation, collect and share good practices, identify enablers, and develop and regularly update non-binding decarbonisation guidance for the companies in the sector
- maintain dialogue with all types of relevant stakeholders in the form of meetings, workshops, and conferences



Circular packaging

Aligns with the no. 4 aspirational objective of the Code

Aspiration

Strive towards full circularity for all sector's packaging (incl. glass, PET and aluminium) by using only recyclable packaging by 2025, by incorporating 50% alternative (e.g. recycled) materials in new plastic bottles by 2030 (30% by 2025) and deploying reusable packaging where it brings sustainability benefits.

Concrete action

NMWE will

- continue to actively promote well-designed deposit return systems (DRS) alongside well performing EPRs, in collaboration with the whole value chain
- liaison with academia to leverage latest scientific developments for further improving the circularity of our packaging
- combat material downcycling and material losses alongside the whole lifecycle loop