



# Environmental Statement



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Date: July 2018

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Date: July 2018

**Environmental Statement  
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AGROAMB Administrator



Date: July 2018

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## 1. AGROAMB PRESENTATION

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**AGROAMB PRODALT, SL** was created in 1999 to provide a destination for organic waste generated in the agri-food industry and at wastewater treatment plants. In addition to removing and transporting organic, industrial, construction and demolition and urban-type waste, it gives value to waste generated in the wastewater treatment process (WWTP and IWWTP sludge), slurry, poultry manure, ash, vegetable and food remains, feed and flour sweepings, oils and animal fats, all within the framework of current legislation.

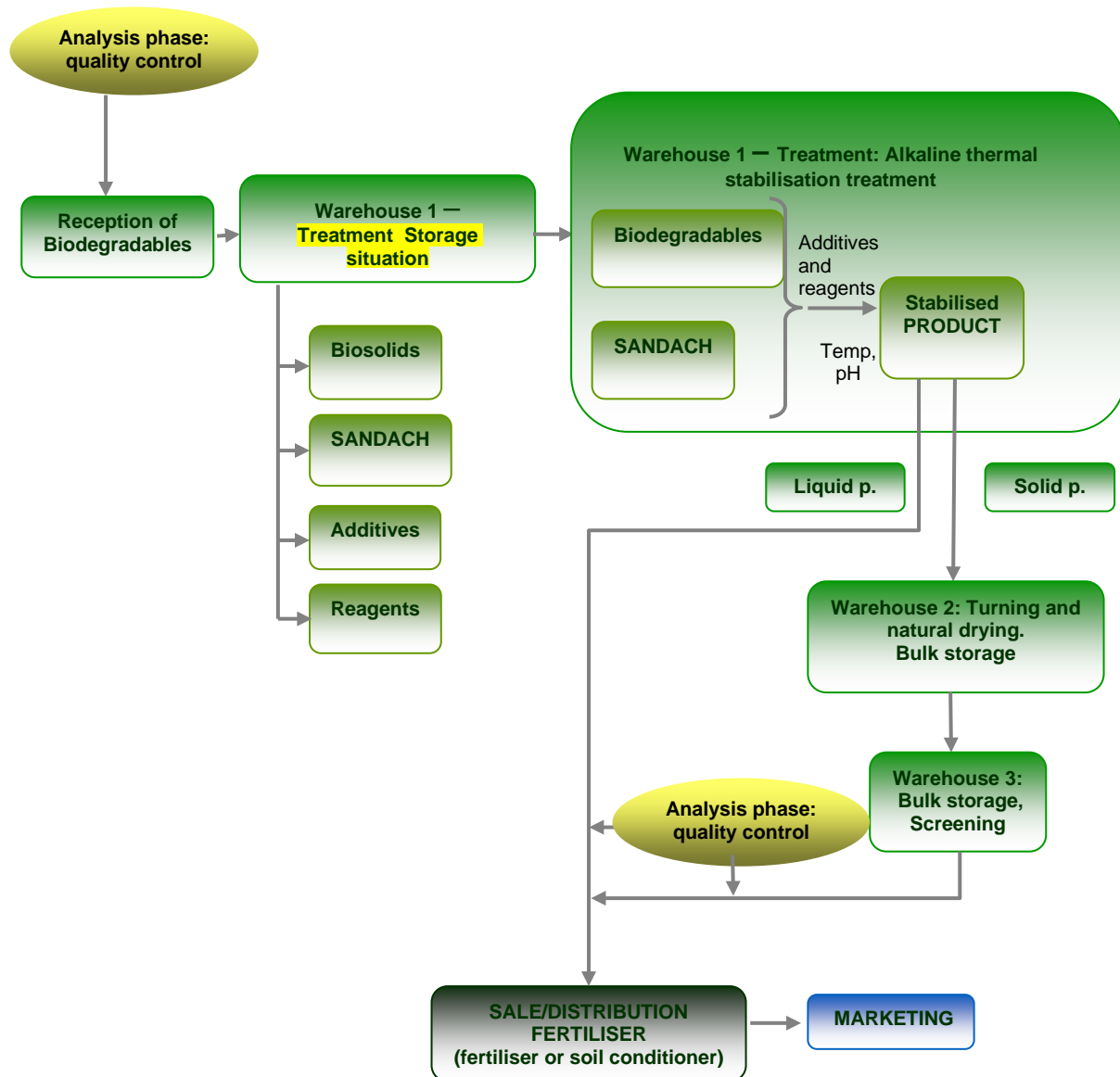
The company is authorised by the *Consellería de Medio Ambiente e Desenvolvemento Sostible* (Regional Department of the Environment and Sustainable Development) of the *Xunta de Galicia* (Regional Government of Galicia) to conduct its activity as a manager of non-hazardous waste of domestic and industrial origin, conducting collection, transport and subsequent valorisation as fertiliser and as Technosols. The plant is also authorised by the *Consellería de Medio Rural* (Department of Rural Affairs) for the treatment of SANDACH type biosolids and for their transport.

Activity at **AGROAMB** focuses on two primary lines: biosolid management and the production and marketing of organic fertilisers. **AGROAMB**'s clients include standard and industrial wastewater treatment plants, companies in the agri-food industry (tinned goods, meats, dairy, etc.) and intensive livestock farm owners who apply fertilisers on their farms. With a view to improving support to its clients and provide an integrated service of the highest quality, in January 2016, **AGROAMB** incorporated management of the transport and logistics services provided by TRESAMB Loxística de Contedores, expanding the scope of the environmental management system.

**AGROAMB** is firmly committed to research and innovation, taking part in and promoting waste recycling and reuse projects, collaborating in the improvement and care of the environment. Within this framework of innovation, AGROAMB develops a line of biosolid treatment for subsequent application in agriculture as fertiliser, guaranteeing proper management of these wastes in an environmentally and economically viable way. The process of alkaline thermal stabilisation treatment carried out at the plant, based on biodegradable waste rich in nutrients and organic material, produces a low-cost fertiliser apt for both agricultural and forestry use. The fertilisers produced by **AGROAMB** are characterised by their

degree of porosity and their ability to retain water as a result of the significant amount of organic material, enabling them to significantly improve the soil structure.

The general process carried out at the plant for the production of fertilisers based on biosolids is summarised in the following diagram:



**AGROAMB** currently has 15 fertilisers on the market:

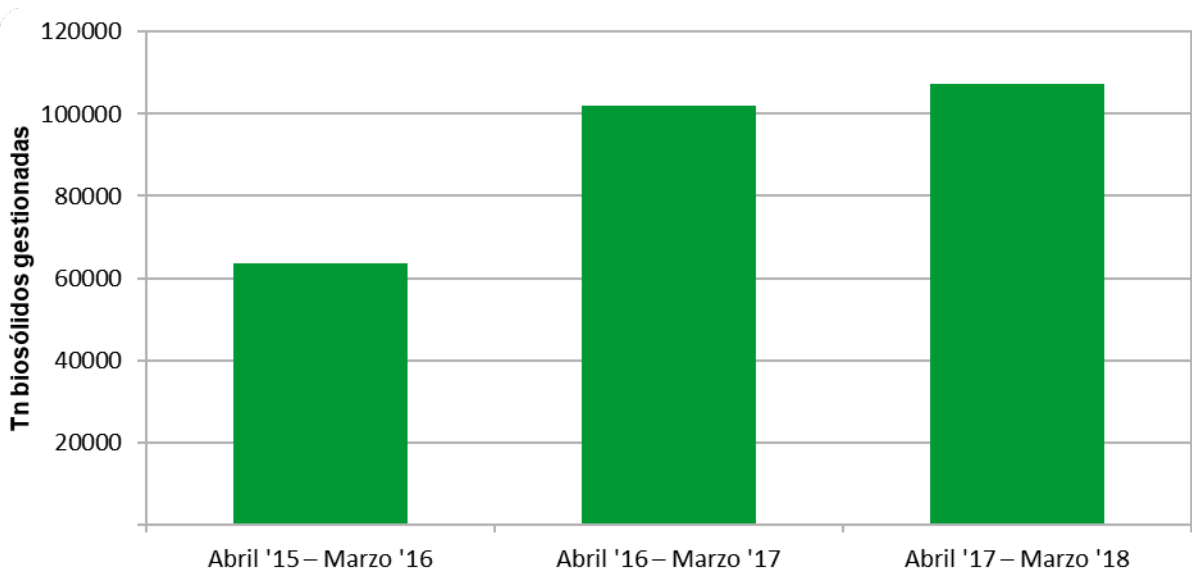


- Organic NPK fertiliser of animal and plant origin: AGROTHAME ORGANITE START
- Nitrogen liquid organomineral fertiliser: AGROTHAME ORGANITE N-L
- NK liquid organomineral fertiliser: AGROTHAME ORGANITE PURINE
- NP liquid organomineral fertiliser: AGROTHAME ORGANITE LIQUID
- NPK organomineral fertiliser: AGROTHAME ORGANITE AGRO, AGROTHAME ORGANITE SULFAGRO
- Organic compost soil conditioner: AGROTHAME ORGANITE COMPOST and AGROTHAME ORGANITE COMPOST START
- Organic humic soil conditioner: AGROTHAME ORGANITE HUMIC START, AGROTHAME ORGANITE HUMIC, AGROTHAME ORGANITE HUMIC ZEN, AGROTHAME ORGANITE HUMOST, AGROTHAME ORGANITE HUMIC GREEN\*, AGROTHAME ORGANITE HUMIC HUMEC\*, AGROTHAME ORGANITE HUMIC HUMIC\*

\* Fertilisers included in the Fertilising Product Registry in March 2017.

You can consult the complete list and the agronomic traits of each fertiliser in the following link:

<http://www.mapama.gob.es/app/consultaFertilizante/ListadoFertilizantes.aspx?idFabricante=506&NombreComercial=&Provincia=>



**Graphic No. 1: Biosolid management at Agroamb Prodalt (2015 – 2018)**

Throughout this period, AGROAMB determined the carbon footprint associated with the process of producing its fertilisers. The calculation was verified by EQA, obtaining a carbon footprint of 0.0259 Tn of CO<sub>2</sub>/Tn of fertiliser sold for 2017.

**AGROAMB** is a member of the *Galician Agrofood Platform* of the *Galician Environmental Technology Platform* (ENVITE) and also takes part in different environmental, management and waste transport associations.

## 2. ACTIVITY SUMMARY. SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

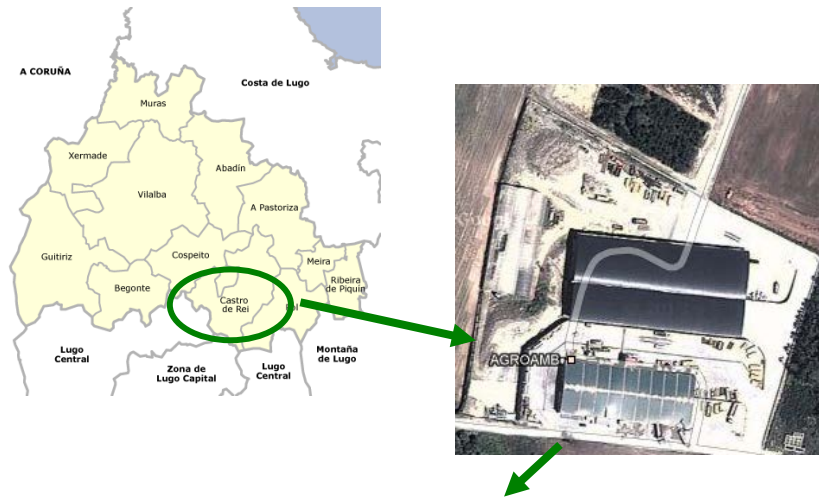
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### 2.1. LOCATION AND CHARACTERISTICS OF THE FACILITIES

<b>Company Name</b>	Agroamb Prodalt, SL		
<b>Tax ID</b>	B27257666		
<b>CNAE/ NACE</b>	3811 – Non-hazardous waste collection 2015 – Manufacture of nitrogen-based fertilisers and compounds		
<b>NIMA</b>	2700008773		
<b>Company Address (Plant)</b>	Ponte de Outeiro, nº 7 27256 - Castro de Rei (Lugo)		
<b>Coordinates</b>	<b>UTM</b>	X: 6296159 Y: 4788095	<b>Geographical Coordinates</b> Lat. 43° 14' 0.63'' N Long. 7° 24' 13.89'' W
<b>Office</b>	Calzadas das Gándaras, 11 bajo 27203– Lugo		

The **AGROAMB** plant, where the activities related to the valorisation of waste are carried out in the production of fertilisers, is located in O Xesto, in the Ponte de Outeiro parish (Castro de Rei), on a 12.45 Ha lot. The plant is distributed in three covered warehouses in which the thermal stabilisation treatment, subsequent maturing and bulk storage of the fertiliser are carried out. These warehouses, together with the concrete slabs on which the raw material loading and unloading operations are conducted, cover 27.55% of the lot (3.43 Ha).

Administrative activities are conducted at the main office of **AGROAMB**, at a commercial premises. The office is distributed into a conference room, an office, a common area and a small toilet.



Aerial images of the AGROAMB PRODALT plant in Ponte de Outeiro - Castro de Rei

## 2.2. ACTIVITIES INCLUDED WITHIN THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

The Environmental Management System defined applies to all activities conducted at **AGROAMB**, which include:

- ✓ Treatment and valorisation of biodegradable waste for the production of organic fertilisers.
- ✓ Collection and transport of non-hazardous, hazardous and animal by-product waste (SANDACH)
- ✓ Overland domestic transport of non-hazardous goods.

### 3. REGULATION 2017/1505 (EMAS III) AT AGROAMB

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**AGROAMB** has an environmental management system certified in accordance with Standard UNE-EN ISO 14001:2004, certified since September 2008 (10143-E), and it has been modified to adapt it to the requirements of Standard UNE-EN ISO 14001:2015.

In 2010, **AGROAMB** decided to follow the EMAS Regulation (ES-GA-000306), considering it to be the most appropriate way of showing its commitment to society, improving the company's image and increasing the levels of credibility and trust before the public authorities, citizens, employee and clients by publishing the Environmental Statement. The implementation and maintenance of EMAS III enable the organisation to continue down the path of continuous improvement, ensuring strict compliance with legislation and adequate performance in the environmental indicators, verifying information through the auditing process. **AGROAMB** has gradually adapted to the successive modifications to *Regulation (EC) No. 1221/2009*, adapting currently to the requirements defined in *Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No. 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS)*.



By promoting participation by the workers at key points in the management system, such as defining objectives or goals or drafting the Environmental Statement, we have notably increased the quality of the working environment, providing incentives to personnel and encouraging teamwork.

Over the years, AGROAMB has oriented its steps toward improving environmental performance. To do so, it has set a series of objectives that have been reached with great effort both by management and by the staff. The actions taken include the following:

1. Emissions of dust and odours have been reduced significantly by conditioning the facilities and paving the perimeter area.
2. Expanding the facilities has increased plant capacity, not only for the thermal stabilisation process, but also for subsequent bulk storage of the fertiliser, enabling a better definition of the different stages in the production process.



3. The environmental awareness actions carried out with AGROAMB employees have gradually reduced the consumption of energy and products such as paper and toner, which also leads to a minimisation of waste.
4. The Environmental Risk Assessment in accordance with Standard UNE 150008 improved the level of knowledge regarding possible environmental impacts.
5. **AGROAMB** offers a unique service to companies, enabling them to valorise their waste (authorised for over 50 LER codes) and achieving a unique benefit for the environment, through the agricultural application of the fertilisers. To continue advancing and to maintain a privileged position on the market, **AGROAMB** focuses on optimising the fertiliser production process to offer clients the greatest quality. Currently, there are 15 fertiliser products registered with the Spanish *Ministry of Agriculture, Fishing and Food*.
6. The level of knowledge has improved in the activities of **AGROAMB** and their impact on the environment by determining the carbon footprint associated directly with the fertiliser production process.

This **Environmental Statement** is a key piece of our environmental management system, as it is used to periodically transmit all the information related to the environmental performance of **AGROAMB** to clients and to any other stakeholder.

This Statement is available to the public at any time:

- ✓ Published on the company's website: [www.agroamb.es](http://www.agroamb.es)
- ✓ In hardcopy format at the **AGROAMB** facilities, accessible to anyone on demand for consultation.
- ✓ A copy will be distributed to all stakeholders who request it.

**AGROAMB** provides its Environmental Statement, corresponding to the April '17 - March '18 period, below.

#### 4. ENVIRONMENT POLICY

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In Regulation (EC) 1505/2017, the Environmental Policy establishes a framework for action and setting environmental objectives and goals, defined as: *the intentions and direction of an organisation relating to its environmental performance as formally expressed by top management including compliance with all applicable legal requirements relating to the environment and also a commitment to continuous improvement of environmental performance*.

The Environmental Policy of **AGROAMB** is integrated with the rest of its policies and includes the commitment to continuous improvement aimed at the prevention of environmental aspects that can have a negative effect.

## ENVIRONMENT POLICY

**AGROAMB**, a company dedicated to management and valorisation, seeks to provide a satisfactory response to the increasingly intense concern within the business world for more environmentally friendly production systems. That is why our company, as an organisation immersed in society, with which it inevitably interacts, cannot detach itself from the general concern for environmental issues, reflected legislatively by laws, directives and other provisions.

In this context, **AGROAMB** considers that its accession to the European EMAS III system and its certificate in UNE-EN ISO 14001, reinforce its commitment to maintaining proper environmental management in its activities, which is developed in our **Environmental Policy**, which is supported on the following pillars:

1. Orienting the company towards sustainable development, seeking an appropriate balance between environmental respect, promotion of progress and social welfare and economic interests, to create value permanently.
2. Ensuring compliance with the applicable legal and regulatory norms (international, European, national, regional and local), as well as the will to adapt to future norms, client and social requirements, as a commitment and responsibility of all.
3. Guaranteeing the continuous improvement of our environmental performance, and prevention of pollution through management system updating and monitoring, using the resources necessary to achieve the planned objectives and goals and improving the environmental performance of our company.
4. Protecting the environment through sustainable utilisation of natural resources and efficient use of energy, optimising the usage of raw materials and encouraging practices of reduction, reuse, valorisation and waste recycling.
5. Promoting research, development and the use of new technologies and processes to avoid or minimise environmental impacts whenever possible.
6. Ensuring at all times that the management and control of the environmental aspects related to our transport, treatment and organic fertiliser production are integrated into our working methods and procedures, as well as in the selection and assessment of suppliers, in planning new activities, products and services or in modifying existing ones to contribute to sustainable development.
7. Reinforcing accessibility and dissemination of our Environmental Policy to our employees, clients and the general public, and drafting and implementing training plans for employees based on their respective activities, facilitating their systematic participation and environmental awareness.
8. Developing lines and channels for communication to inform and dialogue with the stakeholders on the environmental actions, making our **Environmental Statement** available to the public.
9. Management is committed to reviewing the Environmental Policy periodically, when circumstances make it advisable, adapting it to the new organisational, environmental or market demands that may arise.

Signed, Administrator

July 2018



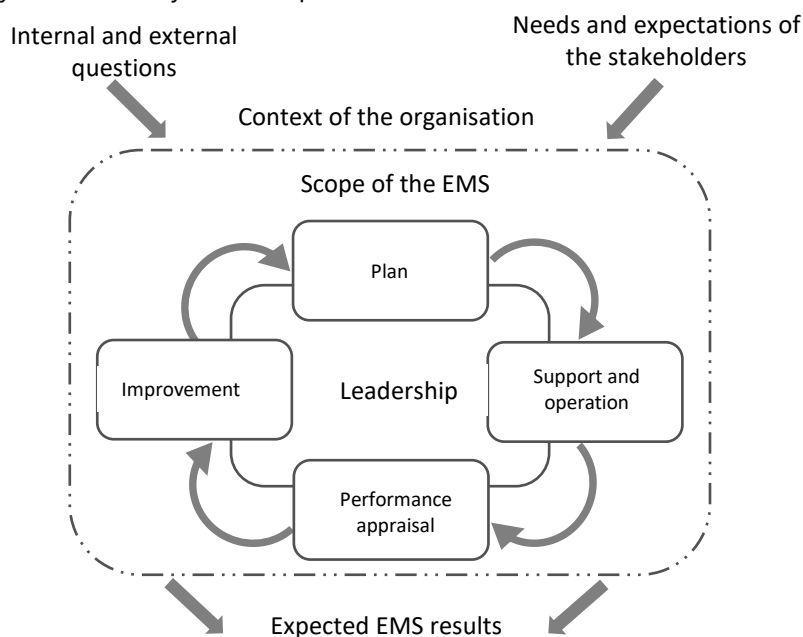
## 5. THE AGROAMB ENVIRONMENTAL MANAGEMENT SYSTEM

The environmental management system established voluntarily by **AGROAMB and integrated into the organisation's general management** makes it possible to improve environmental performance through strict compliance with current applicable legislation and regulations in environmental aspects, continuous improvement and strong involvement by all employees.

The environmental management system implemented at **AGROAMB** is based on the requirements defined in *Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No. 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS)* and the requirements of Standard *UNE EN ISO 14001:20015, Environmental Management Systems. Requirements with guidance for use*.

The environmental management system is based on the concept of plan-do-check-act (PDCA), an iterative method that enables AGROAMB to advance on the road to continuous improvement through the following stages:

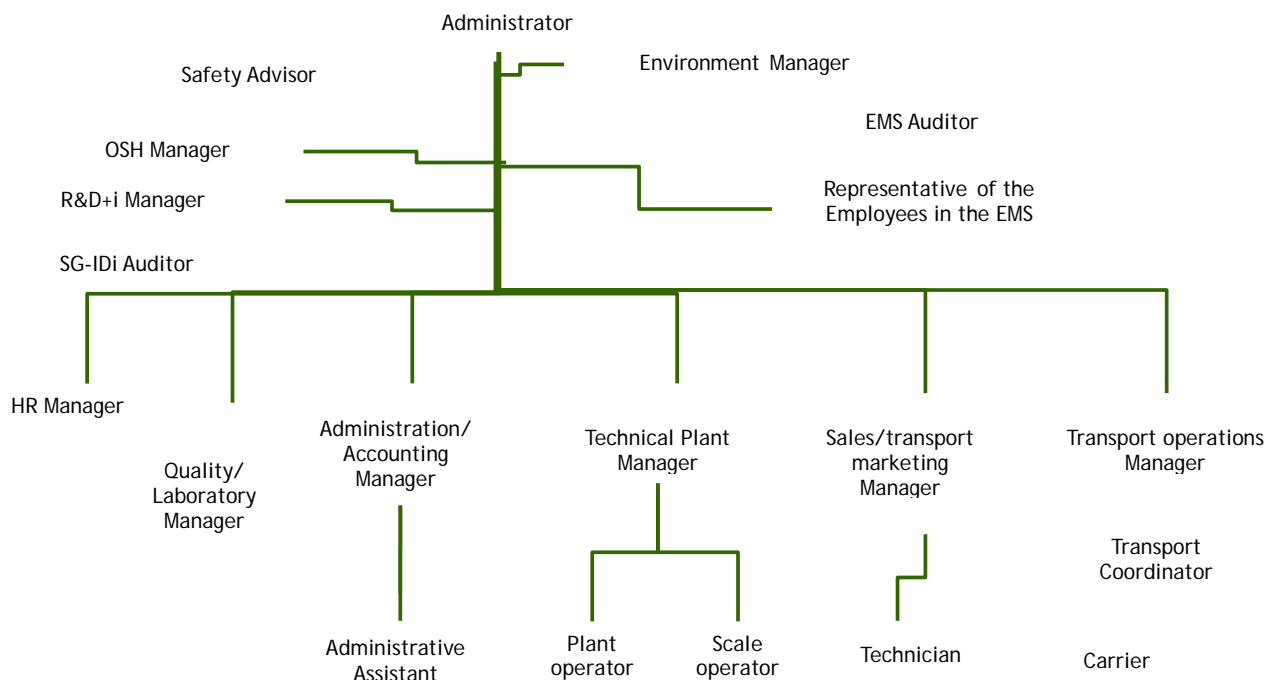
- **Plan:** AGROAMB establishes the environmental objectives and processes necessary to provide results in accordance with the environmental policy, adequately tackling the risks and opportunities that can arise from direct and indirect environmental aspects or from legal and other requirements that may apply.
- **Do:** AGROAMB implements its processes in accordance with the planning through adequate management of resources, competence and awareness, communication, documented information, operational control and preparation and response in the event of emergencies.
- **Check:** AGROAMB monitors and measures its processes with respect to the environmental policy, commitments, environmental objectives and operational criteria, providing information on the results obtained through the internal auditing processes and management review.
- **Act:** to ensure continuous improvement of the EMS, AGROAMB takes corrective actions as necessary to resolve any non-compliance.



The environmental management system implemented at **AGROAMB**, in compliance with the requirements defined in Regulation 1505/2017, includes the following documentation:

- **Environmental Policy.** Shows the principles of action defined by **AGROAMB** management for the purpose of protecting the environment and prevent pollution.
- **Environmental Programme.** Includes the objectives and goals defined annually with the activities necessary to carry them out, in addition to the responsibilities and resources needed to conduct them within the planned period of time.
- **Environmental Management Manual.** Describes both the responsibilities of the **AGROAMB** employees and the control systems established for activities that can have a negative impact on the environment.
- **Procedures** necessary to describe the activities defined in the scope of the environment manual.
- **Work Instructions.** Provide detailed descriptions of how a determined task is carried out and complements the operating procedures.
- **Records.** Offer evidence of proper completion of the processes conducted, reaching the expected results.

The responsibilities deriving from the implementation and maintenance of the environmental management system fall directly on the environment manager who must keep the **AGROAMB** Administrator informed at all times. The hierarchical structure of the **AGROAMB** employees is represented in the following organisation chart:



**AGROAMB** management considers that properly trained personnel enables continuous improvement in the organisation's environmental performance. To guarantee the competence of all employees who conduct tasks with a significant environmental impact, specific training actions will be planned to minimise the possible negative effects on the environment.

But in addition to training the employees, **AGROAMB** must guarantee awareness with regard to the importance of complying with the policy, of the significant environmental impacts of their activities of the consequences of the failure to comply with the requirements of the management system and of the benefits to the environment of improved personal behaviour. That is why, in addition to the different training activities, **awareness campaigns** are also conducted, accessible to all company employees.

To ensure active participation by all company employees and their implication in the environmental management system, a **communication** system was created to enable the fluid exchange of information among all **AGROAMB** workers regarding the aspects, objectives, goals and the environmental management system in general. This enables all personnel to contribute their ideas and suggestions by email and, in addition, to promote participation, a suggestion box has been installed in the office to enable them to express their environmental concerns or any other issue of interest for the continuous improvement of the organisation.

Complementarily, to improve the involvement of **AGROAMB** personnel in the development and maintenance of the EMS, an environment committee has been established that meets annually to discuss matters such as the objectives programme or the environmental statement. At these meetings, the person designated as the workers' representative in the EMS acts as a liaison between senior management and the rest of the staff.

All clients and third parties interested in environmental aspects at **AGROAMB** can express their concerns through the company website ([www.agroamb.es](http://www.agroamb.es)) where they can also access this Environmental Statement. Through the environmental statement, **AGROAMB** communicates with the stakeholders, providing them with all the information related to: direct and indirect environmental aspects related to its activities and to the possible impacts associated with them on the environment and the level of environmental performance by **AGROAMB**.

The **AGROAMB** Administrator reviews the environmental management system annually to evaluate the level of implementation and effectiveness. This review also sets out the annual programme of environmental objectives and goals that will enable continuous improvement in the company's environmental performance. The EMS is monitored by the environment manager in the annual reviews and in any extraordinary meetings held following any circumstance that may have more or less severe consequences for the environment.

The internal audit process objectively evaluates the suitability and effectiveness of the EMS implemented at **AGROAMB**. The system is also validated through an independent, impartial and recognised verifier.

## 6. SIGNIFICANT ENVIRONMENTAL ASPECTS

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**AGROAMB** identifies the **direct environmental aspects** (those that it can control and manage adequately through the associated environmental system), both in normal situations and in situations of emergency or potential accident, and the **indirect environmental aspects**, controlled primarily through the selection of providers/contractors, choosing services or range of products, etc.

The identified environmental aspects are evaluated based on a simple method suited to the activities

included within the scope of the environmental management system implemented at **AGROAMB**. To conduct the evaluation, the following criteria must be taken into consideration:

**TABLE 1: EVALUATION METHOD FOR DIRECT ENVIRONMENTAL ASPECTS IN NORMAL, ABNORMAL AND EMERGENCY CONDITIONS**

**1. Normal/abnormal conditions**

- P<sub>1</sub>:** Toxicity/nature of the aspect
- P<sub>2</sub>:** Receiving area or environment to which emitted or affected/Type of management
- P<sub>3</sub>:** Relative amount generated/extension affected
- P<sub>4</sub>:** Corrective Measures Implemented
- P<sub>5</sub>:** Generation frequency
- P<sub>6</sub>:** Company image (environmental legislation and stakeholders)
- P<sub>7</sub>:** Critical parameter value
- P<sub>8</sub>:** Modification of the characteristics

**Direct Significant Environmental Aspect □**

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**2. Emergency situation or potential accident**

$$\text{Risk} = \text{Severity} * \text{Probability}$$

**Direct Significant Environmental Aspect:** Risk= moderate, significant, intolerable

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**TABLE 2: EVALUATION METHOD FOR INDIRECT ENVIRONMENTAL ASPECTS**

AA: Assessment of the indirect aspect taking into account the degree, nature or danger

EMA: Environmental management assessment of the service or activity (environmental performance of providers and contractors)

**Significant Indirect Aspect:** 50% of the aspects evaluated have a VF assessment = bad or very bad

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The **direct environmental aspects** derived from the activities carried out by **AGROAMB** that are significant are included in the following table, which also indicates the environmental impacts associated with each of them:

TABLE 3: SIGNIFICANT ENVIRONMENTAL ASPECTS - NORMAL CONDITIONS		
	Significant DEA	Associated environmental impact
<b>TRANSPORT OF BIOSOLIDS</b>	Diesel consumption	Depletion of non-renewable natural resources
		Contamination of water and soil
	Atmospheric emissions	Contribution to the alteration of air quality at a regional level
		Contribution to climate change
<b>PROCESS OF PRODUCING ORGANIC FERTILISERS</b>	Water consumption	Depletion of non-renewable natural resources
		Depletion of non-renewable natural resources
	Electricity consumption	Contribution to the alteration of air quality at a regional level
		Contribution to climate change

There were no significant environmental aspects in abnormal conditions following the evaluation. Abnormal conditions were considered to be maintenance and cleaning tasks for facilities, vehicles and replacement of electrical and/or electronic equipment or vehicles not in use.

To identify the **direct environmental aspects in a situation of emergency or potential accident** the following situations were taken into account: fire, explosion, flood, biosolid spill, traffic accident, forced ventilation system breakdown, failure in the fertiliser production process or during the analytics. During the period of April'17 – March'18, there was no accident related to the activities of **AGROAMB**.

The following table includes the environmental aspects that were deemed significant following the evaluation, along with the impacts associated with each of them:

TABLE 4: SIGNIFICANT ENVIRONMENTAL ASPECTS - EMERGENCY CONDITIONS		
	Significant DEA	Associated environmental impact
<b>TRAFFIC ACCIDENT:</b>	Accidental spillage of biosolids (without treatment or prior	Water pollution (heavy metals, pathogenic microorganisms, etc.)

<b>TRANSPORT VEHICLE DUMPING</b>	analysis) on the soil or dumping into water.	Eutrophication of the waters due to an excess of nutrients (N, P)
		Soil pollution (heavy metals, pathogenic microorganisms, etc.)

**AGROAMB** has an Environmental Emergency Plan, coordinated with the Evacuation and Emergency Plan established to maintain the health and safety conditions of the workers, suited to the characteristics of their facilities and the situations that could arise. Workers have the equipment necessary to put out a possible fire (ABC and CO<sub>2</sub> extinguishers), both in the plant and in the office, and all vehicles have a portable extinguisher.

The Emergency Plan is proportional to the potential environmental aspects that are significant. It clearly defines the action criteria that make it possible to minimise the derived environmental impacts and the associated responsibilities, and all workers are aware of them. To improve the efficiency of the Emergency Plan, periodic drills are held.

The **indirect environmental aspects**, though they cannot be managed and controlled directly by **AGROAMB**, can have a negative environmental impact, so they are evaluated following the method indicated above. The evaluation method used by the organisation places special importance on providers or subcontractors having a certified or verified environmental management system, as that enables them to guarantee that they have a control system for each of the environmental aspects. The following table shows the indirect environmental aspects identified at **AGROAMB** that were deemed significant following the evaluation, along with the possible associated impacts.

<b>TABLE 5: INDIRECT SIGNIFICANT ENVIRONMENTAL ASPECTS</b>		
<b>Direct Significant Environmental Aspect:</b>	<b>Associated environmental impact</b>	
<b>EXTERNAL FACILITIES MAINTENANCE SERVICE</b>	Consumption of hazardous products derived from pest and rodent control	Contamination of the soil or water
	Hazardous products derived from pest and rodent control	Contamination of the soil or water
<b>EXTERNAL SERVICE VEHICLE AND MACHINERY MAINTENANCE</b>	Consumption of hazardous products in vehicle and machinery maintenance operations (oil, grease, etc.)	Contamination of the soil or water
	Generation of spills derived from vehicle washing operations: hydrocarbon waters	Contamination of the soil or water
	Hazardous waste derived from vehicle and machinery maintenance operations	Contamination of the soil or water
<b>EXTERNAL TECHNOLOGY</b>	Consumption of fuel in transfers to the AGROAMB facilities	Depletion of non-renewable natural resources
		Contamination of water and soil



SERVICES	Consumption of hazardous products derived from the analytics conducted on the soil and biosolid samples	Contamination of the soil or water
	Hazardous waste derived from the analytics conducted on the soil and biosolid samples	Contamination of the soil or water

Despite **AGROAMB** not having complete control over the management of the indirect aspects identified that are significant due to the special toxicity of the products used and the wastes derived from them, seeks at all times to promote environmental best practices and to comply with the requirements established in the environmental management system implemented between the providers and the contractors, guaranteeing proper management of the waste through an authorised company or responsible consumption of natural resources, requesting all the information related to those aspects from them (registration as a small producers, waste acceptance document, etc.). In addition, when contracting a new provider or contractor, priority will be given to the company having a certified/verified EMS that ensures adequate control of all environmental aspects that could be derived from the services provided by **AGROAMB**.

## 7. ENVIRONMENTAL PERFORMANCE

Through this Environmental Statement, **AGROAMB** publishes the basic indicators related to its direct environmental aspects and other environmental performance indicators in the organisation.

These indicators provide details related to the actual impact/consumption, characterised by:

- i. Offering an exact assessment of the environmental performance at **AGROAMB**.
- ii. Being understandable and unequivocal.
- iii. Enabling a year-on-year comparison to evaluate the organisation's environmental performance.
- iv. Making it possible to establish a comparison on a sector, regional or national scale.
- v. Enabling an adequate comparison with the regulatory requirements.

The indications in Annex IV of Regulation 1221/2009 are taken into account to calculate the basic indicators:

- A: total annual impact/consumption in the field considered (MW\*h, m<sup>3</sup>, Tn, m<sup>2</sup> construction area, TE CO<sub>2</sub>)
- B: annual global production of the organisation. In this case, B = tonnes of biosolids managed
- R = A/B

The following includes the environmental performance indicators at **AGROAMB** following the requirements defined in *Regulation 2009/1221* and *Regulation 2017/1505* (green indicates that the environmental performance was positive for the environmental aspect and orange indicates that it was negative). The degree of environmental performance is calculated considering the periods of April'16 – March'17 and April'17 – March'18.

TABLE 6: ENVIRONMENTAL PERFORMANCE INDICATORS					
Unit	INDICATOR	Environmental performance			
		A	B	R=A/B	
<b>ENERGY</b>					
Total direct energy consumption <sup>(1)</sup>	MW*h / Tn biosolid managed	2780.11	107197	0.0259	<b>2.9 %</b>
<b>MATERIALS</b>					
Total lime consumption	Tn / Tn biosolid managed	2993.66	107197	0.0279	<b>6.2 %</b>
Total paper consumption		0.444	107197	4.14*10 <sup>-6</sup>	<b>8.2 %</b>
<b>WATER</b>					
Total annual water consumption <sup>(2)</sup>	m <sup>3</sup> / Tn biosolid managed	1657	107197	0.0155	<b>38.2%</b>
<b>WASTE</b>					
Total generation of paper waste <sup>(3)</sup>		0.1445	107197	1.35*10 <sup>-6</sup>	<b>6.9 %</b>
Total generation of container waste <sup>(4)</sup>	Tn / Tn biosolid managed	0.1655	107197	1.54*10 <sup>-6</sup>	<b>10.4 %</b>
Total hazardous waste generation <sup>(5)</sup>		0.002	107197	1.87*10 <sup>-8</sup>	<b>N/A</b>
<b>ATMOSPHERIC EMISSIONS</b>					
Total annual emission of GHG (CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFC, PFC, SF <sub>6</sub> )	Tn CO <sub>2</sub> / Tn biosolid managed	824.26	107197	0.0077	<b>2.7 %</b>
Total annual atmospheric emissions (SO <sub>2</sub> , NO <sub>x</sub> and PM)	Tn/ Tn biosolid managed	10.02	107197	9.35*10 <sup>-5</sup>	<b>2.6 %</b>
<b>SOIL OCCUPATION RELATED TO BIODIVERSITY</b>					
Land occupancy	m <sup>2</sup> built area/ Tn biosolid managed	34300	107197	0.3200	<b>4.6%</b>

NOTE:

<sup>(1)</sup> Includes the total electricity consumption at the office and at the plant, as well as the diesel consumption in machinery and vehicles. Does not include the indicator corresponding to the "total consumption of renewable energy" as that type of energy is not currently generated at the AGROAMB facilities, all energy is purchased from the supplier.

<sup>(2)</sup> The total water consumption includes the water consumed at the office (municipal supply) and consumption at the plant (well)

<sup>(3)</sup> This includes the paper waste generated at the plant and at the office

<sup>(4)</sup> This includes the container waste generated at the plant and at the office

<sup>(5)</sup> No assessment is made of the environmental performance with regard to the generation of hazardous wastes, as there is no data for the previous period. These wastes are generated as a result of an emergency situation.

TABLE 7: ENVIRONMENTAL PERFORMANCE INDICATORS			
	Unit	INDICATOR	Performance
Environmental objectives	% objectives reached	75%	
Noncompliance	NC closed/NC open*100	100%	
Environmental communications	(No. of external environmental communications received/No. of external environmental communications answered)*100	100%	
Training actions	(Training actions carried out/training actions planned)*100	85%	

Throughout the period covered by the Environmental Statement, environmental performance at **AGROAMB** has improved slightly compared to the previous period after reorganising the processes and activities carried out by the organisation with the modification of the scope of the EMS and the increase in production, although it is still necessary to continue promoting environmental best practices, both at the office and at the technical plant. The improvement of the environmental performance at **AGROAMB** depends in large part on the employees, so it is essential to place emphasis on issues such as communication, both internal and external, and training and awareness for the workers, seeking to improve the organisation's environmental performance at all levels.

The following sections offer a detailed description of the environmental performance at **AGROAMB** in recent years, with regard to waste generation, consumption of raw materials, water and energy, local issues, emissions into the atmosphere and spills.

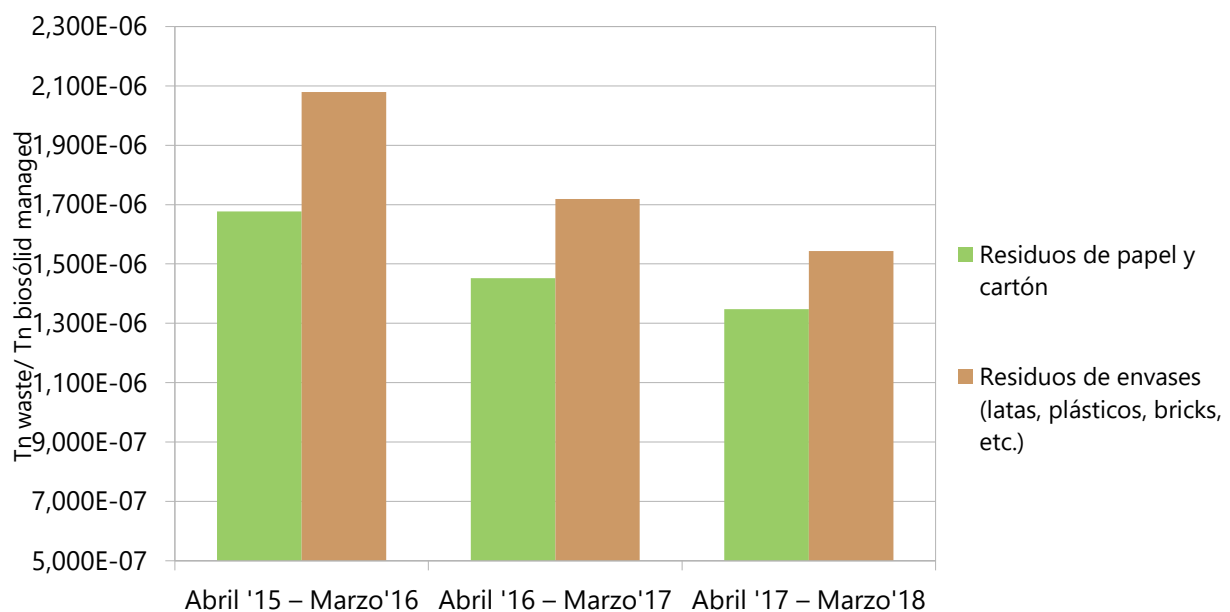
### 7.1. WASTE GENERATION

**AGROAMB** has registries that enable it to control the amount of waste generated at its facilities by type. AGROAMB employees separate the waste to facilitate selective collection by the local government of Lugo, as each type of waste is deposited in its corresponding container (paper, glass, containers) for subsequent management by SOGAMA.

TABLE 8: WASTE GENERATION			
Type of waste	A '15 - M' 16	A '16 - M' 17	A '17 - M' 18
(Tn/ Tn biosolid managed)			
Paper and cardboard waste	1.68*10 <sup>-6</sup>	1.45*10 <sup>-6</sup>	1.35*10 <sup>-6</sup>
Container waste	2.08*10 <sup>-6</sup>	1.72*10 <sup>-6</sup>	1.54*10 <sup>-6</sup>
Plant rejects	1.20*10 <sup>-4</sup>	1.43*10 <sup>-4</sup>	1.46*10 <sup>-3</sup>
Hazardous waste generation			1.87*10 <sup>-8</sup>
(no. units/ Tn biosolid managed)			
WEEE	1.40*10 <sup>-4</sup>		
Toner waste	9.36*10 <sup>-5</sup>	5.87*10 <sup>-5</sup>	8.40*10 <sup>-5</sup>

NOTE: In the case of container and paper waste generated at the plant, in the A'15 - M'16 period there is only information for the month of June.

During the period, it is possible to assess the environmental performance positively with regard to the generation of commercial-type waste, as there was a decrease in the generation of paper waste (6.9%) and containers (10.5%), considering the total amounts generated in the offices of Lugo and Ponte de Outeiro. To maintain this positive trend, we will continue to emphasise awareness actions aimed at minimising waste.



**Graph No. 2: Evolution in commercial waste generation (2015-2018)**

During the period, no WEEE were generated deriving from the replacement of office lights. In the case of printing consumables, toner waste increased by 43% due to the increased amount of administrative bureaucracy.

Sometimes, when the biosolids reach the treatment plant for valorisation, there may be plastics, bottles, cans, etc. mixed in. When this happens, these wastes (LER 150105 and 191212) are separated and managed appropriately by depositing them in the right container, or they are delivered to an authorised manager if necessary. During the April'17 – March'18 period, there was a significant increase in this type of waste (920%), which are rejected from the process as a result of the arrival of a greater amount of biosolids at the plant.

Bulk wood waste can also be generated at the **AGROAMB** plant as a result of the arrival of biosolids on pallets. In this case, the producers are responsible for collecting them for subsequent reuse (otherwise, they are delivered to an authorised manager).

The only hazardous waste generated by **AGROAMB** is derived from the maintenance operations carried out at the company's facilities. This is the responsibility of the companies that make the repairs and, in any case, **AGROAMB** will monitor to ensure that the management is carried out correctly. In

addition, in an emergency situation or accident, there may be small spills of hazardous substances (grease, oils) that require absorbent materials for appropriate treatment and are delivered to an authorised manager.

## 7.2. USE OF NATURAL RESOURCES AND RAW MATERIALS

### 7.2.1. OFFICE PAPER AND CONSUMABLES

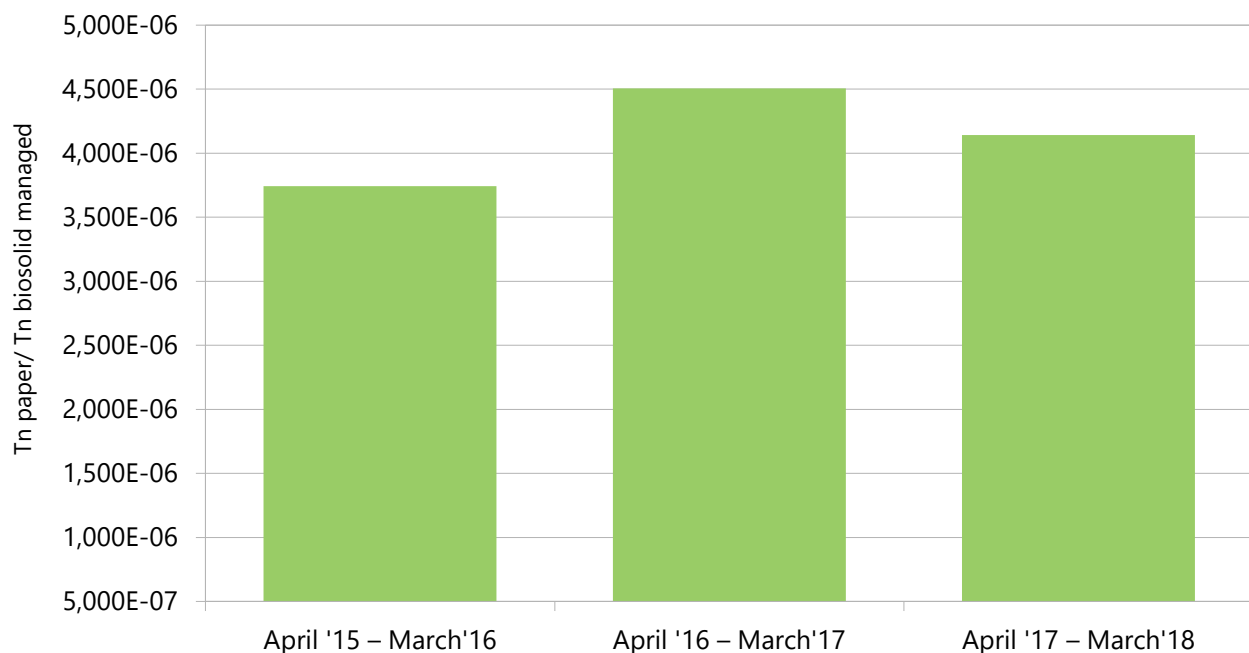
**Paper** consumed at **AGROAMB** is derived mostly from the many administrative processes required to comply with the applicable legislation on waste management. These processes are carried out at the organisation's offices.

**AGROAMB** personnel, aware that excessive paper consumption means depleting non-renewable natural resources and increasing deforestation, attempt to reduce this consumption to the extent possible. Thus, whenever possible, the administrative processes are carried out by email and reuse is encouraged.

When purchasing paper, **AGROAMB** takes into account environmental criteria and is currently consuming mostly chlorine-free paper with the European Ecological Label or similar (*FSC-Mixed Sources*).

**TABLE 9: OFFICE PAPER CONSUMPTION (Tn)**

A'15 - M'16	A'16 - M'17	A'17 - M'18
$3.74 \times 10^{-6}$	$4.51 \times 10^{-6}$	$4.14 \times 10^{-6}$



**Graphic No. 3: Evolution of paper consumption (2015-2018)**

Paper consumption is controlled through invoicing data. After including the paper consumption at the technical plant office, there was an 8.2% reduction in this period.

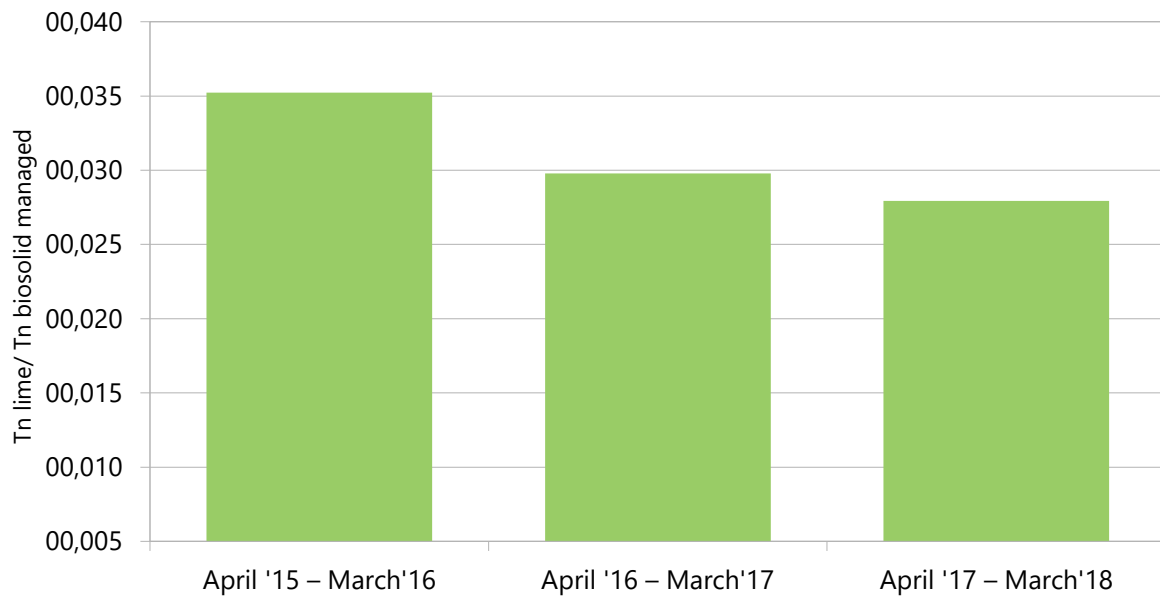
AGROAMB employees receive periodic awareness actions to disseminate the environmental best practices associated with the administrative processes conducted at the office, because it is considered to be the best way to improve environmental performance in this environmental aspect.

**7.2.2. LIME**

During the reactive thermal stabilisation process of the Sandach derivatives, it is necessary to add lime to achieve a base medium. The lime is store appropriately at the **AGROAMB** facilities, keeping it away from direct contact with the soil.

**TABLE 10: LIME CONSUMPTION (Tn/ Tn biosolid managed)**

<b>A'15 - M'16</b>	<b>A'16 - M'17</b>	<b>A'17 - M'18</b>
0.0352	0.0298	0.0279



**Graphic No. 4: Evolution of lime consumption (2015 - 2018)**

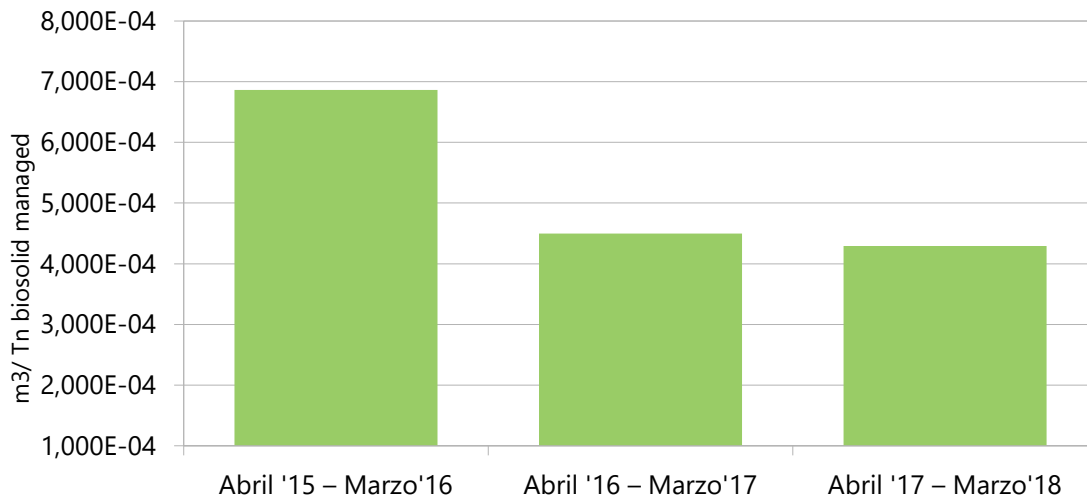
Currently, the biosolids managed by AGROAMB are subjected to an alkaline stabilisation treatment to obtain fertilisers. During this process, the amount of biosolids managed at the plant has been stabilised, which has also stabilised the consumption of lime in the production process (6.2% decrease).

### 7.2.3. WATER

Considering that water is a depletable natural resource, it is very important to take this aspect into account when assessing the environmental performance of **AGROAMB**. Water consumption at the office is derived primarily from the use of toilets by the employees and is controlled through the quarterly bills issued by the local government of Lugo.

**TABLE 11: WATER CONSUMPTION IN OFFICE (m<sup>3</sup>/ tn biosolid managed)**

A'15 - M'16	A'16 - M'17	A'17 - M'18
$6.86 \cdot 10^{-4}$	$4.50 \cdot 10^{-4}$	$4.29 \cdot 10^{-4}$

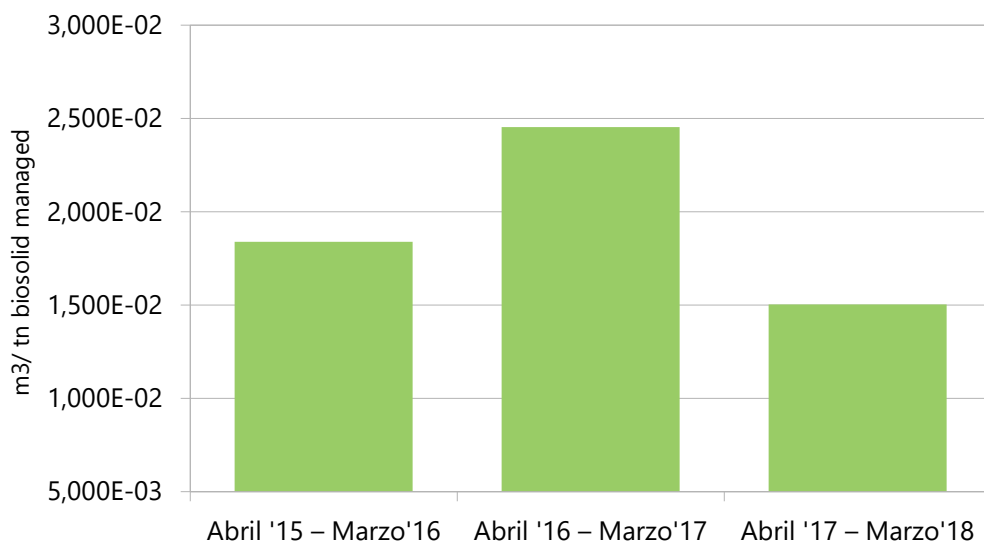


**Graphic No. 5: Evolution of office water consumption (2015-2018)**

Water consumption at the plant is derived primarily from the use of toilets and showers, cleaning the warehouses and wetting the adjacent land to avoid the generation of dust. The water is collected from a well near the plant, and consumption is controlled through an approved meter.

**TABLE 12: WATER CONSUMPTION AT PLANT (m³/ tn biosolid managed)**

A'15 - M'16	A'16 - M'17	A'17 - M'18
1.84*10 <sup>-2</sup>	2.45*10 <sup>-2</sup>	1.50*10 <sup>-2</sup>



**Graphic No. 6: Evolution of plant water consumption (2015-2018)**

The evolution of the water consumption data, both at the plant and at the offices of **AGROAMB**, is compared considering the periods April'16 – March'17 and April'17 – March'18. There has been a decrease in water consumption at both sites (38.8% at the plant and 4.6% at the office) associated with



the promotion of environmental best practices related to water saving measures, both in the use of toilets and in the plant cleaning and maintenance processes.

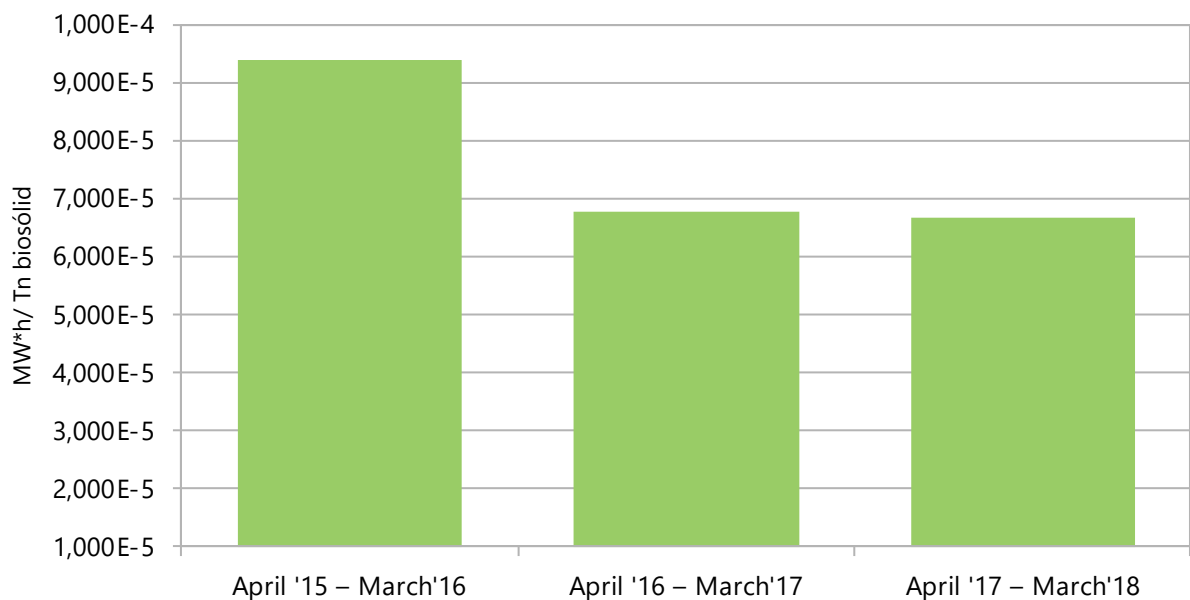
#### 7.2.4. ENERGY

##### A. Electricity

Electricity consumption at the **AGROAMB** offices is controlled through the monthly and bimonthly bills from the electric companies that supply both the office and the plant, where there is a low-voltage line.

**TABLE 13: OFFICE ELECTRICITY CONSUMPTION (m<sup>3</sup>/ tn biosolid managed)**

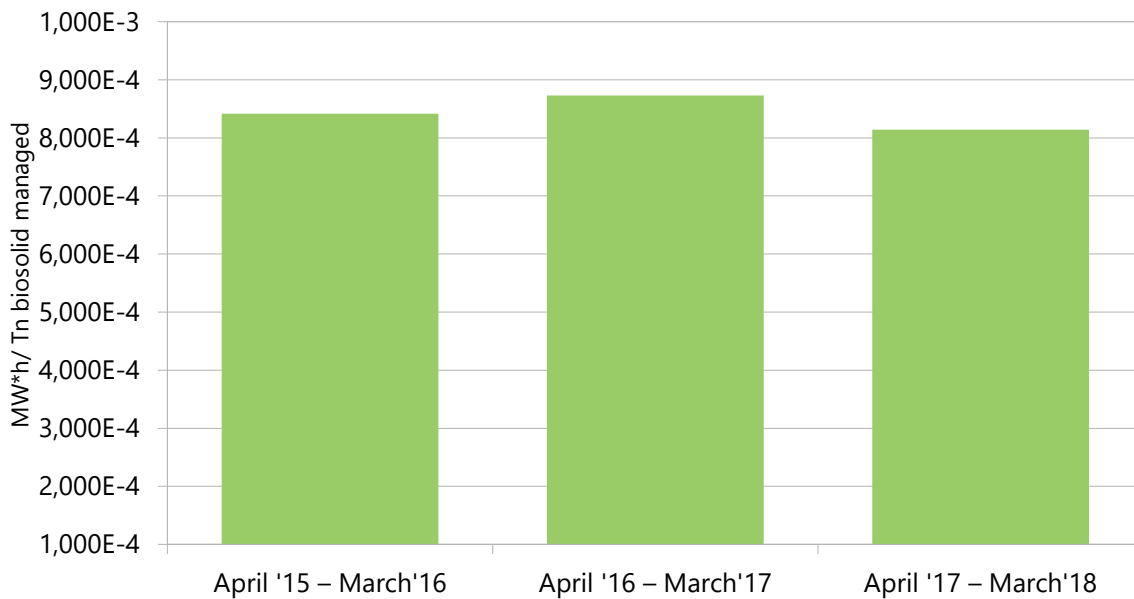
A'16 - M'17	A'17 - M'18	A'18 - M'19
6,77*10 <sup>-5</sup>	6,68*10 <sup>-5</sup>	4,48*10 <sup>-5</sup>



**Graphic No. 7: Evolution of office electricity consumption (2015-2018)**

**TABLE 14: PLANT ELECTRICITY CONSUMPTION (m<sup>3</sup>/ tn biosolid managed)**

A'15 - M'16	A'16 - M'17	A'17 - M'18
8.42*10 <sup>-4</sup>	8.73*10 <sup>-4</sup>	8.14*10 <sup>-4</sup>



**Graphic No. 8: Evolution of plant electricity consumption (2015-2018)**

During the April'17 – March'18 period, there was a 1.3% decrease in electricity consumption at the office, highlighting the best practices implemented and the energy savings represented by the gradual replacement of light bulbs with more efficient LED versions. Consumption at the plant, meanwhile, has decreased by 6.8%.

AGROAMB has contracted IBERDROLA as its electricity supplier. Some 65% of this energy comes from renewable energy sources.

The **AGROAMB** plant also has a wind turbine, currently out of service, with enough power to light the plant. It is expected to be repaired in the long term to take advantage of this renewable energy.

## B. Diesel

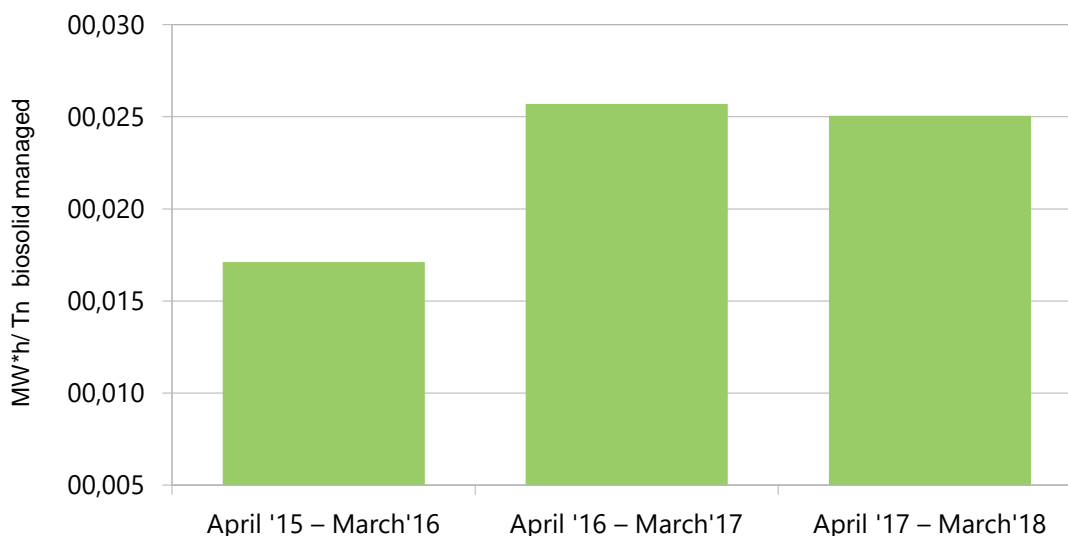
The **AGROAMB** has fuel tanks (diesel A) located in an enclosure with a concrete base to prevent possible damage to the soil due to fuel spills. The total capacity is 6,700 m<sup>3</sup>, and vehicles access as necessary to ensure the diesel supply.

Diesel consumption includes refuelling both at the tank owned by the organisation and at service stations. Diesel A consumption by vehicles owned by AGROAMB and the equipment used at the plant (wheel loaders, transport belts, sweeper, etc.) is grouped together.

**TABLE 15: VEHICLE DIESEL CONSUMPTION (m<sup>3</sup>/ tn biosolid managed)**

A'15 - M'16	A'16 - M'17	A'17 - M'18
0.0171	0.0257	0.0251

**NOTE:** The diesel consumption data were converted based on the data provided by the IDAE at the Ministry of Industry, Tourism and Trade (*Primary energy conversion factors and CO2 emission factor for fuels, thermal uses and electricity*). 1TEP=1170 l of diesel; 1.12 TEP=13.023 MW\*h



**Graphic No. 9: Evolution of vehicle diesel consumption (2015-2018)**

During the period considered in this environmental statement fuel consumption has been optimised through the promotion of efficient driving practices among employees. There has been a 2.7% decrease, so diesel consumption can be considered to have remained stable.

Throughout this period, the electricity generator was not used at the plant, so associated diesel consumption was null.

### 7.3. LOCAL PROBLEMS: NOISE AND ODOURS

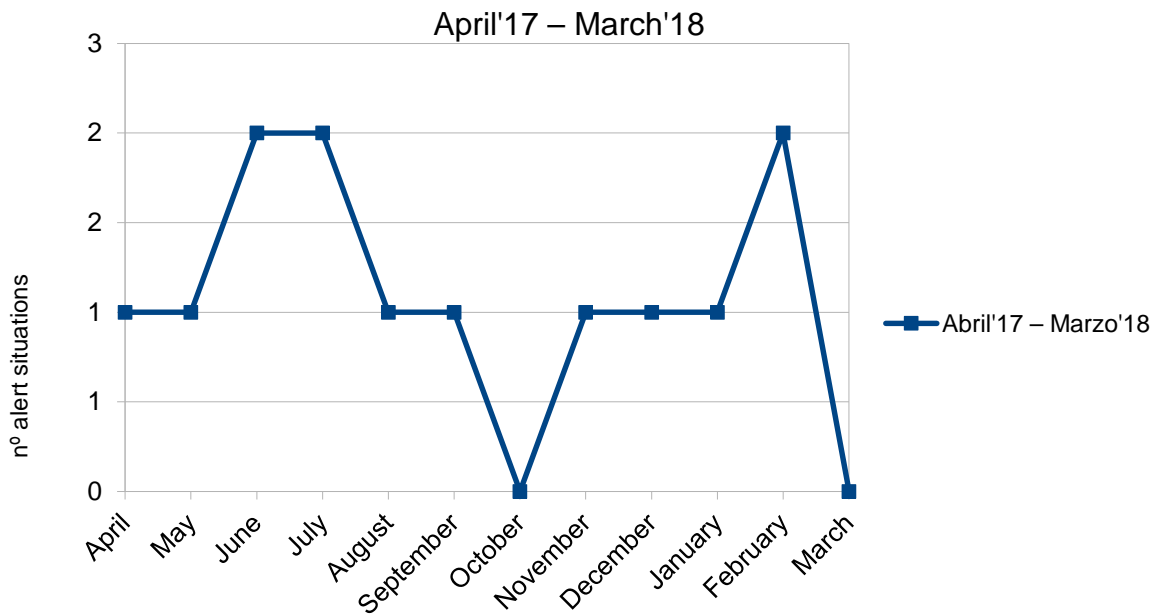
The **AGROAMB** treatment plant is far from any population centre, in an area dedicated primarily to intensive farming, so the environmental impact of possible odours or noises on population centres or nature areas is not significant. Despite that, given the activities conducted by **AGROAMB**, it is necessary to establish a system to control those aspects so that they minimise any possible disturbances associated with them in neighbouring population centres.

As a result of storing biosolids at the **AGROAMB** plant or in the process of mixing them with lime during the stabilisation treatment there may be odours due to the presence of compounds such as ammonia, hydrogen sulphide or amines. This odour can be controlled with the biofilters installed in the warehouse, integrated in the maintenance plan established in the organisation for the equipment.

As an additional control measure, a registry has been created to control the odours generated at the plant. They are used daily by employees to indicate, always based on subjective observation, whether the odour generated is within acceptable, alert or unacceptable limits. If an employee detects unacceptable levels at any time, or if a neighbour reports any incident, a noncompliance situation will be opened, and appropriate actions will be taken immediately.

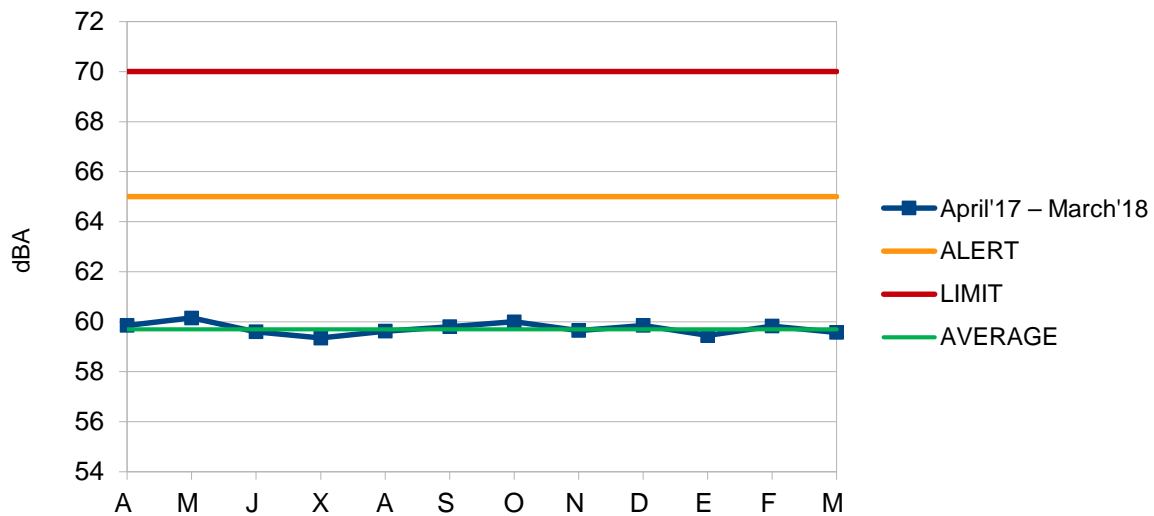
Throughout the April'17 - March'18 period, there were a total of 13 alert situations due to odours (the rest of the registry entries reference acceptable levels), with an increase compared to the previous period (5 alert situations). These situations are due primarily to the mixing or agitation processes in the liquid pit, fertiliser transfer or emptying the treatment warehouse. The alerts were detected during working hours, they were extremely limited in time and they were controlled immediately, so there was

not significant effect on the areas near the plant due to excessive or intolerable levels of bad odours. A company external to AGROAMB drafts an annual odour report that provides evidence on this control measures and their efficiency in preventing disturbances to the population centres.



Graphic No. 10: Alert situations due to odours at the plant (April'17 – March'18)

To control noise outside the plant that occurs during loading operations and during production or storage, the levels of noise are measured using a sound level meter monthly so that proper actions may be taken in the event of any incident or complaint. The average value of the noise intensity around the **AGROAMB** plant during the April'17 – March'18 period is 59.7 dBA, maintaining the same levels as the previous period. The average noise levels never exceeded the alert level of 65 dBA in any case and remained far from the maximum level allowed by the applicable legislation.



Graphic No. 11: Noise measurements at the plant (April'17 – March'18)

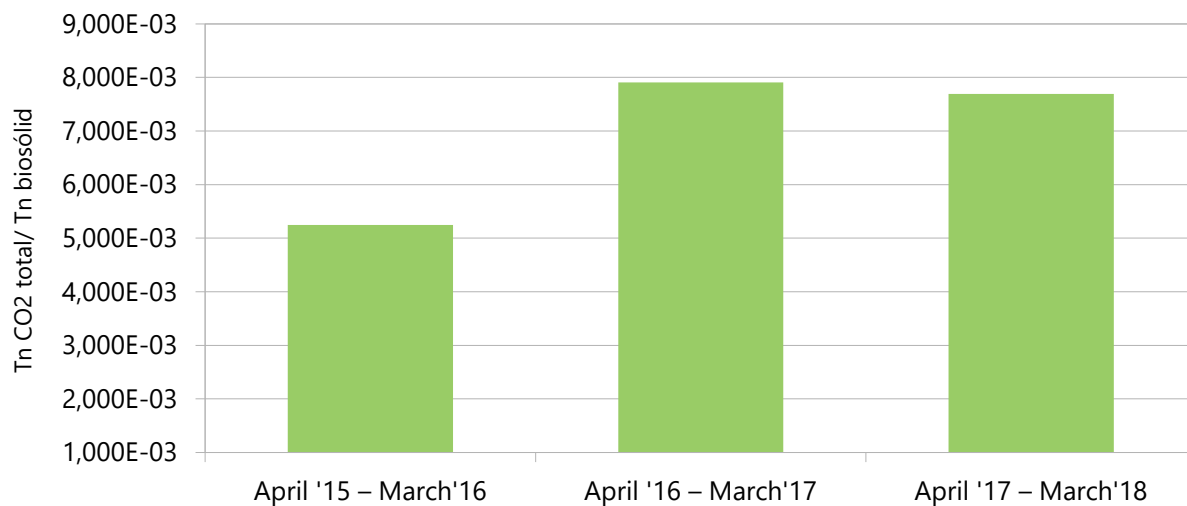
#### 7.4. ATMOSPHERIC EMISSIONS

**AGROAMB** vehicles are considered mobile emission points as a result of the diesel fuel. All vehicles undergo technical inspections and maintenance, ensuring both the particle emission limits and the noise levels are kept within the parameters required by law. Also, during the transport of biosolids, there may be faint unpleasant odours, so **AGROAMB** ensures that all lorries are duly conditioned, covered with impermeable tarps that prevent not only the proliferation of odours or dust particles, but also losses or spills.

**TABLE 16: GREENHOUSE GAS EMISSIONS (Tn CO<sub>2</sub>/ Tn biosolid)**

	A'15 - M'16	A'16 - M'17	A'17 - M'18
<b>Electricity</b>	2.09*10 <sup>-4</sup>	3.36*10 <sup>-4</sup>	3.14*10 <sup>-4</sup>
<b>Diesel</b>	5.04*10 <sup>-3</sup>	7.57*10 <sup>-3</sup>	7.37*10 <sup>-3</sup>
<b>Joint emissions</b>	5.25*10 <sup>-3</sup>	7.90*10 <sup>-3</sup>	7.69*10 <sup>-3</sup>

**NOTE:** The GHG calculation considered the conversion factors provided by the IDAE at the Ministry of Industry, Tourism and Trade (*Primary energy conversion factors and CO<sub>2</sub> emission factor for fuels, thermal uses and electricity*). In the case of electricity, the emission factor considered was 0.375 kg CO<sub>2</sub>/ kW\*h E final ([http://www.minetad.gob.es/energia/desarrollo/EficienciaEnergetica/RITE/Reconocidos/Reconocidos/Otros%20documentos/Factores\\_emision\\_CO2.pdf](http://www.minetad.gob.es/energia/desarrollo/EficienciaEnergetica/RITE/Reconocidos/Reconocidos/Otros%20documentos/Factores_emision_CO2.pdf)). The following conversion factors were considered for diesel consumption: 1TEP=1.170 l of diesel; 1TEP=3.423 tn of CO<sub>2</sub> equivalent.


**Graphic No. 12: Evolution of total GHG emissions (2015-2018)**

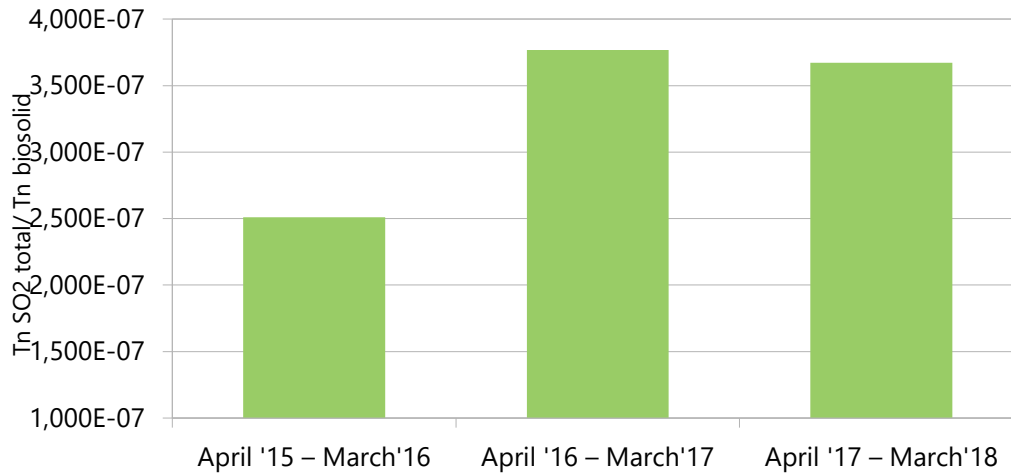
The following includes a list of the total emissions into the air, taking into account the emissions of SO<sub>2</sub>, NO<sub>x</sub> and PM. Emissions deriving from diesel combustion are included (vehicles and plant machinery), as there are not sufficient objective data in the available sources to complete the calculations related to the emissions deriving from electricity consumption.

**TABLE 17: TOTAL AIR EMISSIONS (SO<sub>2</sub>, NO<sub>x</sub>, PM) (Tn CO<sub>2</sub>/ Tn biosolid)**

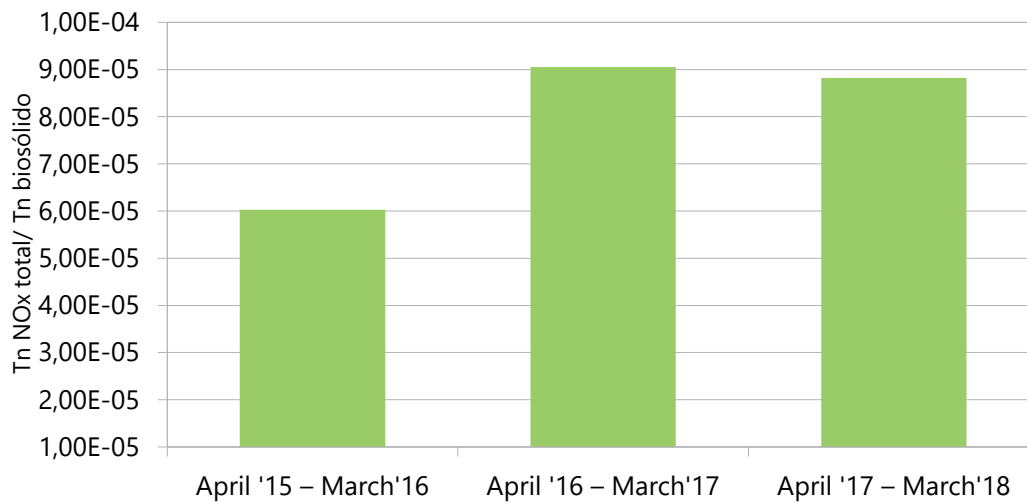
	A'15 - M'16	A'16 - M'17	A'17 - M'18
<b>SO<sub>2</sub></b>	2.51*10 <sup>-7</sup>	3.77*10 <sup>-7</sup>	3.67*10 <sup>-7</sup>
<b>NO<sub>x</sub></b>	6.03*10 <sup>-5</sup>	9.05*10 <sup>-5</sup>	8.82*10 <sup>-5</sup>
<b>PM</b>	3.44*10 <sup>-6</sup>	4.94*10 <sup>-6</sup>	5.04*10 <sup>-6</sup>

**NOTE:** Conversion factors obtained from the study “BRT Environmental Benefits and Technological Perspectives” (2007) prepared for Volvo.

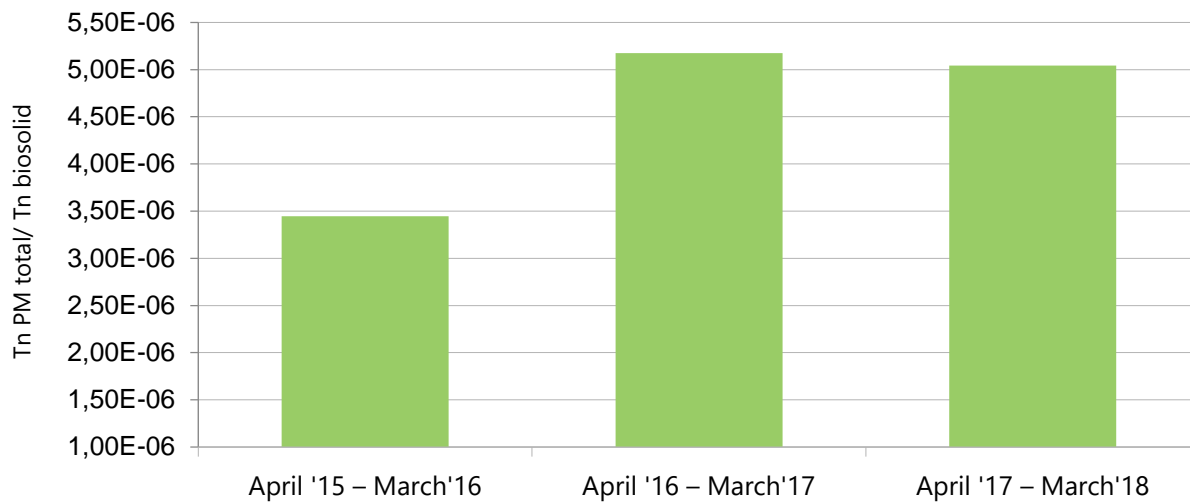
SO2 emissions: 0.8325 kg/l with a maximum S content in diesel of 350 ppm; Emissions NOx: 0.035 kg/l; Emissions PM: 0.002 kg/l



Graphic No. 13: Evolution of the total SO<sub>2</sub> air emissions (2015-2018)



Graphic No. 14: Evolution of the total NO<sub>x</sub> air emissions (2015-2018)



**Graphic No. 15: Evolution of total PM air emissions (2015-2018)**

Following the significant increase in GHG emissions and total emissions into the air in the previous period, the data show that environmental performance in these areas has stabilised, with a slight decrease of 2.7 and 2.6%, respectively.

### 7.5. DISCHARGES TO WATER

The **AGROAMB** plant stores biosolids awaiting incorporation into the production process, so leaching may occur. The composition of this leaching depends in large part on the type of biosolid, but it tends to be characterised by a high nitrogen content and a concentration of heavy metals well below the levels established by current legislation.

Leaching is collected in a deposit pool (isolated from the soil by a concrete tub that prevents filtrations into the ground) through an effluent collection channel on one side of the warehouse. The warehouse is on a slight grade to facilitate the collection, and it also has an impermeable floor so that any leaching in the reception area does not filter into the soil.

Once the pool reaches 80% of its capacity, the leached liquids are stabilised and valorised as fertiliser or added to the biosolid treatment process. An analysis is run first to check that all parameters (agricultural, microbiological, etc.) meet the requirements established by law so that there is no associated environmental impact.

Both the water-tight nature of the tanks and the collection channel is checked visually each month, but also, to avoid possible environmental impacts on the water or the soil (during the wet and dry seasons), piezometers are used twice a year upstream and downstream near the **AGROAMB** warehouse to characterise the soils and ground waters, ensuring that there is no contamination due to leaching at either of the two measurement points.

Sewage water from the plant showers or toilets are dumped to the biosolid storage pool and returned to the process.



## 8. DEGREE OF COMPLIANCE WITH THE APPLICABLE ENVIRONMENTAL LEGISLATION

In its Environmental Policy, **AGROAMB** is committed to complying with environmental legislation and regulations applicable to its activities. To do so, it has an efficient methodology that identifies this legislation. The environmental management system has registries that are updated periodically which include all the applicable legal and regulatory requirements in addition to all other requirements that **AGROAMB** has chosen to adhere to voluntarily.

At least once a year, the degree of compliance with the legal and other environmental requirements applicable to regular activities is verified so that if any noncompliance is observed the appropriate measures are taken immediately to resolve it. In addition, during the internal audit, the legislation is reviewed exhaustively.

On 20/07/18, the check list of legal requirements was reviewed, identifying the legislation and evaluating the degree of compliance by **AGROAMB**: the result was satisfactory. This check list considers the following scopes:

- i. Classified activity
- ii. Environmental responsibility
- iii. Water: supply and sewage
- iv. Material emissions into the atmosphere: diesel combustion in vehicles
- v. Energy emissions into the atmosphere: noise
- vi. Industrial waste (hazardous and non-hazardous), waste from electrical and electronic devices (WEEE) and batteries.
- vii. Soil effects
- viii. Waste management and transport. Goods transport.
  
- ix. Fertilisers
- x. Technosols
- xi. Safety
- xii. Fuel storage
- xiii. Pressure equipment
- xiv. Low voltage electrical installation
- xv. Other requirements adhered to voluntarily by the organisation.

**AGROAMB** has the licenses necessary to conduct its activities both at the office (Lic. No. 124/2010, pursuant to Law 9/2013) and at the plant, issued by the councils of Lugo and Castro de Rei, respectively. It also has the authorisations and permits required by applicable legislation, necessary to conduct the activities included in the scope of the environmental management system, which was recently extended following the merger with TRESAMB, another AGROAMB group company. They include:

Authorisation	Applicable legislation
Plant with registration number ES.27.04.PTEC for the treatment of category 2 and 3 SANDACH	RD 476/2014, of 13 June, which regulates the national registry of the movement of animal by-products and derivative products not destined for human consumption. Royal Decree 1528/2012, of 8 November, which establishes

		the standards applicable to animal by-products and derivative products not destined for human consumption.
SC-U-NP-PM-00006	Urban waste at mobile plant (PM-U) Technosol preparation	Law 22/2011, the Waste and Contaminated Soils Act Decree 174/2005, which regulates the legal framework for the production and management of waste and the General Registry of Waste Producers and Managers of Galicia,
SC-I-NP-PM-00030	Industrial waste at mobile plant. Technosol preparation	Law 10/2008, the Galician Waste Act, Decree 59/2009, which regulates the traceability of waste ITR/01/08 for the production of technosols derived from waste.
SC-U-NP-XV- 00040	Urban waste valorisation manager (XV-U). Fertilizer production	Law 22/2011, the Waste and Contaminated Soils Act Decree 174/2005, which regulates the legal framework for the production and management of waste and the General Registry of Waste Producers and Managers of Galicia,
SC-I-NP-XV-00064	Industrial waste valorisation manager (XV-I). Fertilizer production	Law 10/2008, the Galician Waste Act, Decree 59/2009, which regulates the traceability of waste RD 506/2013, on fertiliser products
SC-I-NP-XRT-00056	Professional industrial waste carrier (XRT-I)	Law 22/2011, the Waste and Contaminated Soils Act
LU-RP-P-TP-00028	Professional hazardous waste carrier	Law 22/2011, the Waste and Contaminated Soils Act
LU-NP-NP-00006	Industrial waste trader (NR-I)	Law 22/2011, the Waste and Contaminated Soils Act
LU-I-NP-AR-00001	Industrial waste agent	Law 22/2011, the Waste and Contaminated Soils Act

NOTE: The following link shows the current authorisations for AGROAMB PRODALT, together with the LER codes assigned to each of them <http://sirga.cmati.xunta.es/xestores>

As regards the operation of the facilities, **AGROAMB** has the permits and authorisations necessary for private use of the well that supplies the plant (art. 85 of the Water Public Domain Regulation) and of the low-voltage line (RD 824/2002, of 2 August, which approves the low-voltage electro-technical regulation).

Although the only hazardous waste generated are those derived from vehicle and machinery maintenance, which are carried out by organisations external to the organisation, **AGROAMB** is registered in the "Rexistro Xeral de Productores e Xestores de Galicia" ("General Registry of Producers and Managers of Galicia") (Registration No.: LU-RP-P-PP-00808) to guarantee proper management of any hazardous waste generated in abnormal situations or in situations of emergency (Decree 174/2005, which regulates the legal regime for the production and management of waste and the General Registry of Waste Producers and Managers of Galicia).

## 9. OBJECTIVES AND GOALS. ENVIRONMENTAL MANAGEMENT PLAN

Through the Environmental Policy, **AGROAMB** establishes its principles of action with regard to the prevention of contamination and environmental protection. These general objectives are extended through the Environmental Objectives and Goals Programme, which also plans the activities necessary

to achieve these objectives, defining both the resources and the responsibilities and establishing the periods of execution.

Over the years, **AGROAMB** has made efforts to improve its environmental performance, and from the beginning ambitious objectives have been established that require significant economic investments to improve the available infrastructures and general plant conditioning. The environmental objectives and goals defined by AGROAMB are consistent with our environmental policy and with our general commitments, including continuous improvement.



The following includes the Environmental Objectives and Goals Programme defined by AGROAMB for the period covered by this statement, studying the degree of achievement of each of them.

**ENVIRONMENTAL ASPECT: ELECTRICITY CONSUMPTION**

**Objective No. 1: Optimise electricity consumption at the plant**

<b>Goal No. 1: Reduce electricity consumption by 1%</b>	<b>Actions</b>	Designing an awareness programme for the AGROAMB employees aimed at environmental best practices with regard to electricity consumption associated with the use of machinery and working equipment.
		Posting 1 informative poster.
		Replacing light bulbs at the plant with LED systems
	<b>Persons Responsible</b>	Environment Manager.
	<b>Resources</b>	HR Economic resources
	<b>Term of execution</b>	June 2018

DEGREE OF ACHIEVEMENT: During the period, thanks to the awareness and information measures put into practice and the installation of 58 LED type bulbs, electricity consumption was reduced by 2.3%.  
100% OBJECTIVE ACHIEVED

**ENVIRONMENTAL ASPECT: HAZARDOUS AND NON-HAZARDOUS WASTE GENERATION PRODUCT CONSUMPTION**

**Objective No. 2: Optimise the use of material resources (machinery, equipment, etc.) available in the organisation**

<b>Goal No. 1: Design a preventive maintenance plan suited to the needs of AGROAMB</b>	<b>Actions</b>	Conduct an exhaustive inventory of the material resources (equipment, machinery, etc.) and analyse the most appropriate preventive maintenance activities in each case.  Plan the preventive maintenance actions based on specific needs, also considering the regulatory inspections that must be conducted.
	<b>Persons Responsible</b>	Environment Manager Plant Manager
	<b>Resources</b>	Economic resources HR
	<b>Term of execution</b>	August 2018

DEGREE OF ACHIEVEMENT: For reasons of planning, it was not possible to design the maintenance plan in accordance with the objectives programme. Considering that it is an objective that will make it possible to optimise the processes conducted at the plant significantly, it has been moved to the next period.

OBJECTIVE NOT ACHIEVED

**ENVIRONMENTAL ASPECT: ATMOSPHERIC AND OTHER EMISSIONS**
**Objective No. 3: Improve the environmental performance of AGROAMB**

<b>Goal No. 1: Increase the environmental awareness of clients and stakeholders</b>	<b>Actions</b>	Participate in 2 events (workshops, conferences, courses, etc.) related to the environment  Email-based information campaign for the events to be conducted with clients, collaborators, etc.  Design information brochures or similar to hand out at the events.
	<b>Persons Responsible</b>	Environment Manager
	<b>Resources</b>	HR Economic resources
	<b>Term of execution</b>	August 2018
<b>Goal No. 2: Analysis of GHG emissions derived from the inclusion</b>	<b>Actions</b>	Conduct an inventory of the emission sources associated with the activity.  Collect the emission factors.  Conduct the GHS emissions calculation (carbon footprint) associated with the AGROAMB activity.

of transport activities within the scope of the AGROAMB EMS.

Analyse the evolution of the carbon footprint calculation considering the data collected in the 2016-2018 period.

**Persons Responsible** Environment Manager

**Resources** HR  
Economic resources

**Term of execution** August 2018

DEGREE OF ACHIEVEMENT: Throughout the period, AGROAMB has taken part in different events (1st Cycle of Forestry EPS Conferences, Somos Paisaxe Awards, Innovative SME Award, etc.), conducting information campaigns through different media (email, web page, social media, etc.) with stakeholders. The AGROAMB carbon footprint was verified in July (0.0259 Tn of CO<sub>2</sub>/ Tn of fertiliser sold for 2017). In the coming years, a new calculation will be conducted to analyse the evolution of the footprint based on the measures developed.

100% OBJECTIVE ACHIEVED

**Objective No. 4: Optimise the communication process with the stakeholders in all matters related to the EMS**

**Actions** Review the design of the website, including access to social media, environmental information, etc.

Adapt the content to ensure two-way communication with the stakeholders.

**Goal No. 1: Review and improve the corporate website**

**Persons Responsible** Environment Manager

**Resources** HR  
Human resources  
Material resources

**Term of execution** August 2018

DEGREE OF ACHIEVEMENT: Throughout the period, the design of the website was improved significantly, facilitating two-way communication with the stakeholders.

100% OBJECTIVE ACHIEVED

The following includes the objectives defined in July 2018 for the next period:

**ENVIRONMENTAL ASPECT: HAZARDOUS AND NON-HAZARDOUS WASTE GENERATION. PRODUCT CONSUMPTION**

**Objective No. 1: Optimise the use of material resources (machinery, equipment, etc.) available in the organisation**

<b>Goal No. 1: Design a preventive maintenance plan suited to the needs of AGROAMB</b>	<b>Actions</b>	Train the plant maintenance manager specifically (master's programme organised by a renowned entity).
	<b>Actions</b>	Conduct an exhaustive inventory of the material resources (equipment, machinery, etc.) and analyse the most appropriate preventive maintenance activities in each case.
	<b>Actions</b>	Plan the preventive maintenance actions based on specific needs, also considering the regulatory inspections that must be conducted.
	<b>Persons Responsible</b>	Environment Manager Plant Manager
	<b>Resources</b>	Economic resources HR
<b>Term of execution</b>	August 2020	

**ENVIRONMENTAL ASPECT: WATER CONSUMPTION**

**Objective No. 2: Optimise water consumption at the plant**

<b>Goal No. 1: Reduce water consumption at the plant by 1%</b>	<b>Actions</b>	Acquisition of a washing machine with greater energy and water consumption efficiency.
	<b>Persons Responsible</b>	Environment Manager Plant Manager
	<b>Resources</b>	Economic resources
	<b>Term of execution</b>	August 2019

## 10. VERIFIER DATA

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This Environmental Statement was submitted during the Audit conducted on 24 July 2018 before the verifier certified by ENAC: EUROPEAN QUALITY ASSURANCE SPAIN, SL with code ES-V-0013.

## 11. PERIOD FOR THE NEXT STATEMENT

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The next verification of the environmental management system and validation of the Environmental Statement in accordance with the requirements of *Regulation 2009/1221* and *Regulation 2017/1505 (EMAS III)* will take place in July 2019.

Environmental Statement approved by:



Mr Severiano Ónega Ares  
AGROAMB ADMINISTRATOR