



Nr. Reg. Com.: J40/296/1997
Cod Fiscal: RO 9089452
Capital social subscris și vărsat: 60.000.000 LEI

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EHS ANNUAL MONITORING REPORT

Reporting period: 01/01/2021 - 31/12/2021

1. Reporting framework

Since 2014, TTS (Transport Trade Services) S.A. ("TTS") has launched an internal process to monitor the main aspects of environmental protection and occupational safety and health, both in its activity and in the activity of its main subsidiaries.

This process is materialized in an EHS Annual Monitoring Report ("EHS Report") which documents how TTS and a number of subsidiaries with a significant impact at the group level address the issues they face in terms of environmental protection, safety and security, occupational health and emergencies. EHS reports cover the period from 1 January to 31 December of each calendar year.

The beneficiaries of the EHS Report are the members of the management of TTS and of the monitored subsidiaries - Board of Directors and Executive Management, who thus have at their disposal a tool on the basis of which they can make all the necessary and useful decisions regarding the monitored areas.

In carrying out the monitoring and EHS Reports, TTS is assisted by TQ Consultanță și Recrutare S.R.L Galați (<https://tqconsult.ro/>), an ISO 14065/2013 accredited company by RENAR for the verification of greenhouse gas emission reports and tons-kilometer data in accordance with Implementing Regulation (EU) 2018/2067 ("the Consultant").

Report date: March 31, 2022

2. Monitoring perimeter

The companies covered by the EHS 2021 Report are the following:

Name	Main activities	Main and secondary offices
TTS (Transport Trade Services) S.A. ("TTS")	Freight forwarding	București, Giurgiu, Oltenița, Bechet
CNFR Navrom S.A. ("Navrom")	Danube shipping	Galați, Drobeta-Turnu Severin, Constanța



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Name	Main activities	Main and secondary offices
TTS Operator S.R.L. ("TTS Operator")	Direct transshipment of bulk and packaged goods	Constanța
TTS Porturi Fluviale S.A. ("TTS Fluvial")	Port operation	Galați, Brăila, Drobeta-Turnu Severin
Canopus Star S.R.L. ("Canopus")	Cereal port terminal operation	Constanța
Cernavodă Shipyard S.R.L. ("Cernavodă Shipyard")	Ship repairs	Cernavodă

3. Management systems and performance standards

3.1. Evaluated and certified management standards:

	ISO 9001	ISO 14001	ISO 45001	ISO 22000
TTS	TIC 15100127867 Valid certificate 17.02.2021- 30.01.2024 (TÜV Thuringen)	NO	NO	NO
Navrom	16.11.2020 / 73 100 5711 / TÜV Hessen	16.11.2020 / 73 104 5711 / TÜV Hessen	09.12.2020 / 73 117 5711 / TÜV Hessen	NO
TTS Operator	RO2019.101.042Q /19.08.2019	RO2019.101.042.E /19.08.2019	RO2019.101.042.S /04.08.2020	NO
TTS Fluvial	10.11.2020 / C00111- N-R / Business Quality Cert	10.11.2020 / M00046-R / Business Quality Cert	10.11.2020 / SM00033-R / Business Quality Cert	10.11.2020 / SA00006-R / Business Quality Cert
Cernavodă Shipyard	TÜV 05.03.2021 TIC 151001810280	TÜV 05.03.2021 TIC 15104181612	TÜV 05.03.2021 TIC 1511618864	NO
Canopus	NO	NO	NO	NO

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3.2. Environmental objectives identified on the basis of ISO 14001 for the year 2021:

Company	Objective	Term	Measures	Realized
Navrom	Prevention of accidental pollution with serious consequences caused by company ships	Permanent	Acquisition by crews of the roles of preventing and combating accidental pollution and performing practical training.	100%
			Equipping ships with the necessary facilities and materials for intervention in the event of accidental pollution, including oil and gas absorbers.	100%
	Reducing emissions	Permanent	Maintaining propulsion equipment in normal operating parameters;	100%
			Timely revisions and repairs;	100%
			Use of diesel Euro 5 / <0.1% Sulf.	100%
			Modernization of the fleet of propelled ships and technical ships, with the replacement of engines with new generation ones, with low emissions: - pusher Mercur 209- pusher Mercur 309-workshop ship Cibin - Centaur 1 și 2 tugs (completion 2022) - floating crane 512 - floating crane 872 (completion 2022)	100%
	Selective collection of waste at company and branch offices and on board ships	Permanent	Equipping with the necessary equipment;	100%
			Staff training (PO – 18)	100%
			Concluding contracts with collection companies for all categories of waste generated	100%
			Carry out an audit of the waste and establish the necessary measures to reduce the amount of waste generated	100%
Reducing the risk of pollution by discharging dangerous goods off ships	Permanent	Regular training of staff through specialized courses	100%	
		Verification of ships carrying dangerous goods by ANR according to ADN requirements	100%	
TTS Fluvial	Efficient recovery of	Permanent	Training of staff on how to collect and store	100%

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Company	Objective	Term	Measures	Realized
TTS Fluvial (cont.)	waste		waste	
	Compliance with the requirements of the integrated management system	12.2021	Internal staff training on the company's environmental policy	100%
	Compliance with the environmental legislation regarding the obtaining of the environmental authorization-taking over the grain silo	12.2021	Revision of the environmental authorization no. 44/2013 due to the takeover of the grain silo and modification of the conditions that were the basis for the revision	05.03.2021
	Reduction of silo handling losses	05.2021	Replacement of spill protection devices	Reprogrammed for 2022
	Responsible and safe disposal of waste	Permanent	Delivery of waste resulting from the operation of ships to authorized companies.	100%
	Selective waste collection	Permanent	Delivery of waste resulting from the activity carried out at the headquarters (paper + cardboard, plastic packaging, etc.) to authorized companies	100%
TTS Operator	Identifying and keeping under control all environmental aspects resulting from the environmental assessment	Permanent	Assessment of environmental aspects and compliance with legislation	100%
	Diminishing the environmental impacts produced in carrying out the	Permanent	Use of processes, practices, technologies that control or reduce environmental impact: <ul style="list-style-type: none"> • Water splashes of operating berths • Substantiation of maintenance plan for 	100%

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Company	Objective	Term	Measures	Realized
TTS Operator (cont.)	activity		equipment, ships, floating cranes <ul style="list-style-type: none"> • Implementation of loading-unloading instructions for goods (reduction of the crane-ship / barge distance, stops in time of strong wind) • Observance of the procedure for planning the operation of vehicles, cranes, equipment (elimination of downtime) • Acquisition of equipment with low noise and vibration levels • Training of staff working on tools, cranes, equipment • Acquisition of appropriate protective equipment (helmets, goggles, protective masks) 	
	Prevention of environmental pollution	Permanent	- Training of employees on selective waste collection - Development of waste management plan	100%
	Permanent communication on the field of environmental protection	Permanent	Communication of the environmental policy statement within the company	100%
	Efficient management of natural and energy resources	Permanent	- use of natural lighting - rational use of work equipment - inventory and capitalization of batteries, tires and used parts from the car workshop.	100%
	Management of substances with an impact on the environment and storage containers (oxygen, acetylene, propane, diesel, waste oil)	Permanent	- personal training - checking the validity of the technical data sheets regarding the specific conditions - labeling of these substances and their proper storage	100%
	Waste management	Permanent	- personal training - handing over waste to authorized units	100%

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Company	Objective	Term	Measures	Realized
	<i>monitoring</i>		<i>- purchases of bins, special containers</i>	
Cernavoda Shipyard	<i>Identifying and keeping under control all aspects of the environment</i>	<i>Permanent</i>	<i>Environmental assessment</i>	<i>100 %</i>
	<i>Diminishing the environmental aspects resulting from the activity</i>	<i>Permanent</i>	<i>Use of processes, practices, technologies that control and reduce the impact on the environment</i>	<i>95 %</i>
	<i>Prevention of environmental pollution</i>	<i>Permanent</i>	<i>Identification of training needs, RMM training, personnel for selective waste and equipment servicers</i>	<i>100 %</i>
	<i>Efficient management of natural and energy resources</i>	<i>Permanent</i>	<i>Use of natural lighting, rational use of protective equipment, use of batteries and used equipment parts</i>	<i>95 %</i>
Cernavoda Shipyard (cont.)	<i>Management of substances with an impact on the environment and storage containers (propane, waste oils)</i>	<i>Permanent</i>	<i>Personnel training, validity check and technical data sheets, specific conditions, proper storage of containers</i>	<i>100 %</i>
	<i>Waste management monitoring</i>	<i>Permanent</i>	<i>Personnel training. Delivery of waste to specialized companies</i>	<i>100 %</i>
Canopus	<i>Reducing environmental pollution</i>	<i>Permanent</i>	<i>- Monthly reports on cleaning the grain terminal - Test reports - wastewater: Report / 15.03.2021, Report / 08.06.2021, Report /12.09.2021, Report / 11.12.2021 - Test reports - sedimentable dusts in air: Report / 18.04.2021, Report / 24.08.2021</i>	<i>100%</i>
TTS	<i>Identifying and keeping under control all aspects of the environment</i>	<i>12.2021</i>	<i>Annual analysis and updating of the list of environmental issues</i>	<i>100 %</i>

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Company	Objective	Term	Measures	Realized
	Prevention of environmental pollution	Permanent	- Selective collection and recovery of waste, arrangement of collection spaces - Reducing the risk of pollution by disposing of handled goods: staff training, compliance with equipment maintenance schedule, purchase of absorbent	100 %

3.3. Assessment of environmental aspects

Company	Insignificant aspects	Significant aspects	Details on significant issues	Control measures
TTS	7	0	-	-
Navrom	24 (16 of them may become significant in the event of accidents, damage or emergencies)	1	Transport of dangerous goods by inland waterways	Personnel training for dangerous goods - expert training courses (ADN) Preparation of ships involved in the transport of dangerous goods, according to the provisions (ADN). Adoption and application of procedure PO-19 (transport of dangerous goods) Assimilation and implementation of plans PS-01 (accidental pollution prevention and control) and PS-02 (freight security)
TTS Operator	5	2 (Emergency situations due to natural and anthropogenic)	Earthquake, floods, storms, blizzards, heavy rainfall, droughts that could cause property damage or loss of life	1. Reporting the event 2. Alarming the intervention teams 3. Quick intervention to save lives 4. Collaboration with the

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Company	Insignificant aspects	Significant aspects	Details on significant issues	Control measures
		conditions)	and environmental pollution	authorities and investigation of cases
TTS Fluvial	221	27	-generation of risk / explosion with impact on human health in emergencies (26) -water bilge management (1)	-monitoring the quality of handled, stored cereals; -monitoring preventive maintenance program and technical equipment repair plan -delivery of bilge water to authorized agents (APDM).
Canopus	8	0	-	-
Cernavodă Shipyard	10	1	Use of electrical installations	Monthly training and follow-up

3.4. Emergency preparedness and responsiveness

	Intervention plan	Training plan	Proof of training
TTS	Emergency response plan	Annual training program 03.01.2021	Individual training sheets on the line of fire protection and emergencies
Navrom	- Security plan PS-03: Emergency protection measures, - Emergency Roles apply on board ships (Fire, Flood, Damage, Man Overboard, Abandonment or Pollution)	- PO-43-SU Organization of activities in the field of ES - IP-35-SU; organizing and carrying out fire protection activity - Provision A21-7345 / 2021: emergency exercises on board ships	- PO-44-SU Training of workers in the field of ES - Individual training sheets on fire and emergency protection
TTS Operator	Fire response plan	2021 training program	Training report
Cernavodă Shipyard	Action plan	Emergency training plan	Training reports
TTS Fluvial	Fire intervention plans approved by ISU for its own ports (Galați, Brăila and Drobeta-Turnu Severin) and for TTS ports (Giurgiu, Oltenița)	Annual training program	Individual training sheets on the line of fire protection and emergencies
Cernavodă	Action plan	Emergency training plan	Training reports

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	Intervention plan	Training plan	Proof of training
Shipyards			
Canopus	<i>Emergency action plan</i>	- ES files - Training program in the field of emergency situations	<i>Reports of exercises performed</i>

3.5. Organizational capacity and competence

The EHS managers from each company in the monitoring perimeter (Elena BOTEA - Navrom, Eduard Cristian CATANĂ - TTS Operator, Liliana MANEA - TTS Fluvial, Alina LICU - Canopus, Dorin BUCĂ - Cernavoda Shipyards) collect the monitored information and send it periodically to the EHS manager at group level (Florian Niculae-TTS), who together with the Consultant centralizes them and prepares the EHS Report.

The process of monitoring and drafting the EHS Report is coordinated by the Corporate Governance and Investor Relations Department within TTS, through Gabriel-Andrei ȚECHERĂ and Tudor BOBOC.

EHS managers in companies ensure that environmental, health and safety policies are promoted and are concerned with meeting national legal requirements for the environment, health and safety (which, in most cases, are transpositions of European law).

In addition, at the level of each company, a waste management officer is appointed, who has the obligation, according to the legal requirements in force, to keep a monthly record of waste management, to report quarterly to the group's EHS manager (Florian Niculae) and annually to the competent local environmental authority.

3.6. Inspections

ISU inspections

Company	ISU inspections	Identified nonconformities	Measures	Follow-up actions
Navrom	In Galați: 23.03.2021 ISU Galați	Smoking area is not marked.	Warning	The smoking area has been marked
		Access to the fire hydrant is not free (it is under a wooden paneling).		The paneling is permanently open. The furniture cannot be modified
		Exit lighting requires maintenance		Maintenance measures have been taken.
	In Drobeta Tr. Severin: Report no. 72	The boiler room could not be reviewed PSI instructions were not	Warning	Keeping the access key in the unit. PSI instructions were

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Company	ISU inspections	Identified nonconformities	Measures	Follow-up actions
	/ 26.07.2021 ISU Mehedinti	displayed in fire hazard areas		displayed in fire hazard areas
		Electrical installation with faults and without periodic inspection by an authorized company		The faults have been fixed
		Library shelves do not ensure a minimum fire reaction A2 (they have wooden elements)		Replace the wooden elements
TTS Fluvial	Report from 16.03.2021 ISU BRAILA	The location of the technical means of fire protection does not take into account the requirements regarding the height of accessibility (maximum 1.4 m height from the floor) and fixing them so as not to prevent the evacuation of persons in case of fire	The technical means of fire protection have been repositioned	Answer to ISU Braila by the address no.742TTS PF BR / 14.04.2021;
TTS Fluvial (cont.)		The access lanes between the stacks of goods inside the storage spaces are not delimited and marked accordingly	The delimitation and marking of the corridors was done	Answer to ISU Braila by the address no.742TTS PF BR / 14.04.2021;
		PRAM bulletins issued following the measurement of the dispersion resistance of the installations for capturing and draining the ground of static electricity do not comply with the deadlines specific to the degree of soil moisture	PRAM bulletins will be prepared in compliance with the deadlines specific to the degree of soil moisture	Answer to ISU Braila by the address no.742TTS PF BR / 14.04.2021;
		The water supply network of the external hydrant fire extinguishing installation does not ensure its proper supply, with the necessary flows and pressures and for the normed time, according to the provisions of the specific technical regulations	The installation of external hydrants is in progress, (fire safety notice 1034/21 / SU-BR)	Answer to ISU Braila by the address no.742TTS PF BR / 14.04.2021;

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Company	ISU inspections	Identified nonconformities	Measures	Follow-up actions
TTS Fluvial (cont.)	Control report from 13.07.2021 ISU Mehedinti	-During the storage and handling of products, their physico-chemical properties are not taken into account, so that the contact between them does not produce / spread the fire, in the sense that in the scrap metal piles there were also combustible wastes such as masses plastics, textiles and rubber products	I informed the owner of the goods METALROM SRL and I requested the sorting and removal of combustible waste from the stock of goods	Answer to ISU Mehedinti by the address no.1007TTS PF TS / 29.07.2021
		- The electrical installation is operated outside without observing the technical norms regarding the protection of the electrical contactors against combustible materials (electrical extension cord placed on the wooden frame of the door) and it has not been periodically checked with a certified legal person	The cable of the electric extension cord was laid according to the regulations in force	Answer to ISU Mehedinti by the address no.1007TTS PF TS / 29.07.2021
		-Access to the external hydrant located on the S concrete platform is difficult due to the placement of some iron rolls	The access road to the external hydrant has been cleared	Answer to ISU Mehedinti by the address no.1007TTS PF TS / 29.07.2021
		-Access to an indoor hydrant in the general cargo warehouse is hampered by the placement of big bags of fertilizer in the vicinity	The access road to the external hydrant has been cleared	Answer to ISU Mehedinti by the address no.1007TTS PF TS / 29.07.2021

Environmental inspections:

Company	Environmental inspections	Results	Follow-up actions
Canopus	Environmental guard Finding notes no. 15 / 21.01.2021 and no.90 / 10.05.2021	Air particles monitoring	Air particle monitoring - quarterly analysis: Test report no. 41 / 18.04.2021
	Environmental guard	Contraventional sanction for non-	Closed

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Company	Environmental inspections	Results	Follow-up actions
	Observation note Nr. 87 / 10.05.2021	compliance with the provisions of art. 79 paragraph (2) letter b of Law no. 104 of 2011.	
Navrom	<u>GALAȚI:</u> report no. 257 / 24.08.2021 Galati Environmental Guard	Disposal and elimination of all existing waste at the site by authorized companies.	Done
		Reorganization of external storage spaces and separation of discarded equipment from spare parts.	Done
		Ensuring the selective collection of all categories of waste generated.	Done
	<u>Drobeta Turnu Severin:</u> Finding note no. 508 / 14.07.2021 Mehedinti Environmental Guard	Prohibition of pontoon placement for the ship "Mehedinți" without holding all the documents in terms of environmental protection and building permit.	-
	<u>Drobeta Turnu Severin:</u> Finding note no. 518 / 20.07.2021 Mehedinti Environmental Guard	Verification of the manner of fulfillment of the environmental protection norms by the ship "Mehedinți"	No action was taken.
	<u>Drobeta Turnu Severin:</u> Finding note no. 604 / 01.10.2021 Environmental Guard + Mehedinti Naval Transport Police	Verification of compliance with legal measures for environmental protection and safety of navigation Verification by the Environmental Guard of the wastewater quality analysis bulletins.	Done
	<u>Drobeta Turnu Severin:</u> PV 12550 / 15.11.2021 Mehedinti Environmental Guard	Contravention sanction for pontoon placement without the necessary approvals on the line of environmental protection.	Done

ITM inspections

Company	Inspection report	Nonconformities	Measures taken
CNFR Navrom S.A. Galati	PV 512/06.05.2021 ITM inspection at Constanța branch	No non-compliances were found	No action has been taken

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Company	Inspection report	Nonconformities	Measures taken
	PV 11837/08.02.2021 ITM inspection at Drobeta branch	The OSH designated worker did not take the postgraduate course in assessing the risks of accidents and occupational diseases.	The OSH designated worker was enrolled in the postgraduate course assessing the risks of occupational injury and illness.
	PV 12456/11.08.2021 ITM inspection at Drobeta branch	The prevention and protection plan does not contain all the risks of accidents and occupational diseases existing in the workplace.	The prevention and protection plan has been revised.

Navrom: Non-conformities identified in 2020 with remedial deadline 2021

Nonconformities from 2020	Measures taken and closing date
It is recommended that an annual reassessment of the legal requirements and compliance obligations be met.	They were included in the internal audit report and are analyzed annually in the management meeting. 24.09.2021
It is recommended to specify the financial resources needed to carry out the activities in the action plans.	Included in the action plan. 24.09.2021
It is recommended to collect evidence during the exercises on how to act in emergency situations on ships (photo, film, etc.).	Provision A21-7345 / 2021 regulating the execution of emergency drills has been issued and disseminated to ships. Crews send photos or videos of the rehearsals 31.12.2021
It is recommended to implement an automatic fire warning and extinguishing system on board ships	Fire warning systems have been installed on 6 ships (Mercury, Mercury 208, Mercury 206, Mercury 209, Mercury 305, Mercury 309). The other ships will be fitted as they undergo long-term repairs. Fireball-type automatic fire extinguishing systems have been fitted to all line and shuttle vessels. 31.12.2021

Navrom: customer complaints

a) *Depreciated goods: 11 complaints*

- damages = 2,903 EUR + 110,899 RON, paid by NAVROM, all values being under the deductible of the insurance policy;

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- b) Lack of goods at unloading: 3 complaints
 - damages = RON 64,121.95, of which RON 13,096.83 were recovered on insurance;
- c) Ships unfit for operation: 20 (no damage, deficiencies initially found have been remedied).
- d) Delays in arrival: 2 complaints (due to difficulties in crossing the thresholds on low waters).

4. Working conditions

4.1. Labor relations

Company	Number of employees	Trade union organization	Collective labor agreement
TTS	48	No	No
Navrom	543	No	No
Canopus	9	No	No
TTS Fluvial	159	No	No
TTS Operator	170	No	No
Cernavodă Shipyard	57	No	No

Given that the employees of the companies have not set up trade unions and the companies have not concluded collective bargaining agreements, the task of resolving the complaints and grievances of the employees rests with the management of the companies.

Complaints and complaints are received by fax, e-mail, mail / courier service or directly at the company's headquarters, are registered by the registry in the register of issued / received documents, and then addressed to the person responsible for solving the reported problems.

Companies have a documented grievance management system.

Annually, the management of the companies analyzes and orders measures regarding the internal management system of the notifications and complaints of the employees.

Some companies hire workers through personnel leasing service providers, in accordance with the law. These companies ensure that suppliers have a good reputation and have their own social and environmental management procedures. The criteria for selecting suppliers include the existence of such procedures. Contract workers have access to the mechanism for resolving complaints and grievances available to company employees.

In 2021, Navrom, TTS Operator and Cernavoda Shipyard turned to personnel leasing services.

In 2021, there were no complaints from employees or contract workers.

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4.2. Health and safety at Work

TTS	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	46	0	43	0
Number of hours / person worked	89.472	0	90.311	0
Number of deaths at work	0	0	0	0
Number of days with occupational injuries	0	0	0	0
Number of working days lost (accidents at work)	0	0	0	0
Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0
Injury rate	0	0	0	0
Frequency rate of accidents at work	0	0	0	0

Navrom	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	543	264	526	0
Number of hours / person worked	1.219.200	0	1.056.208	0
Number of deaths at work	1	0	1	0
Number of days with occupational injuries	3	0	0	0
Number of working days lost (accidents at work)	521	0	0	0
Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0
Injury rate	2,4	0	0	0
Frequency rate of accidents at work	427,3	0	0	0

TTS Operator	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	170	0	176	109
Number of hours / person worked	310.332	0	350.592	217.120
Number of deaths at work	0	0	0	0
Number of days with occupational injuries	0	0	0	0
Number of working days lost (accidents at work)	0	0	0	0
Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0

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Injury rate	0	0	0	0
Frequency rate of accidents at work	0	0	0	0

Cernavodă Shipyard	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	57	33	63	32
Number of hours / person worked	103.960	53.911	105.890	65.245
Number of deaths at work	0	0	0	0
Number of days with occupational injuries	0	0	0	0
Number of working days lost (accidents at work)	0	0	0	0
Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0
Injury rate	0	0	0	0
Frequency rate of accidents at work	0	0	0	0

TTS Fluvial	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	159	-	137	0
Number of hours / person worked	21394	-	20597	0
Number of deaths at work	0	0	0	0
Number of days with occupational injuries	1	0	0	0
Number of working days lost (accidents at work)	20	0	0	0
Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0
Injury rate	0	0	0	0
Frequency rate of accidents at work	0	0	0	0

Canopus	2021		2020	
	Hired	Contracted	Hired	Contracted
Number of employees	9	0	7	0
Number of hours / person worked	15.968	0	10.265	0
Number of deaths at work	0	0	0	0
Number of days with occupational injuries	0	0	0	0
Number of working days lost (accidents at work)	0	0	0	0

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Number of new cases of occupational diseases	0	0	0	0
Number of accidents with injuries	0	0	0	0
Injury rate	0	0	0	0
Frequency rate of accidents at work	0	0	0	0

4.3. Occupational safety and health training

	TTS	Navrom	TTS Operator	TTS Fluvial	Canopus	Cernavodă Shipyard
Annual OSH training program	x	According to the PO-26 procedure	x	x	x	x
OSH training plan	x	- Test training program - Course participation planning	x	x	OSH theme	x
Proof of training	Individual training sheets	Individual training sheets	Individual training sheets Training minutes for contractors	Individual training sheets	Individual training sheets	Individual training sheets

- The following periodic trainings and trainings shall be performed on board ships:
 - periodic labor protection training: monthly, at the entrance to the shift;
 - mode of action of the crew in emergency situations (fire, water hole, man overboard, abandonment of the ship, accidental pollution, etc.): monthly, at the entrance to the shift; the action procedures in these situations are permanently displayed on board the ships, in visible places (usually in the square / dining room), with the mention of the attributions of each member of the crew in the respective situation; when the crew enters the shift, the commander updates the crew list so that each crew member knows what to do in an emergency, after which the training is performed.
- TESA staff (technical, economic, socio-administrative) is trained once a year for at least 2 hours. In addition to this training, half-yearly training is provided on fire protection and emergencies.
- Due to the pandemic, the course attendance plan was disrupted (it was partially fulfilled, some companies that organized courses suspended their activity).

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4.4. Fire safety

4.4.1. Navrom

<i>Fire safety activities</i>	<i>Mandatory frequency</i>	<i>Execution dates</i>
<i>Exercises in case of fire</i>	<i>Annually</i>	<i>Annual schedule</i>
<i>Inspection and certification of electrical and mechanical fire detection and extinguishing systems.</i>	<i>Annually</i>	<i>Annual schedule</i>
<i>Portable fire extinguisher inspection, refilling / recharging</i>	<i>Annually</i>	<i>Annual schedule</i>

Extinguishing devices are checked annually. The portable fire extinguishers are transported to the headquarters of specialized companies (usually the companies from which the fire extinguishers were purchased), where both the loads and the valves or other components are checked and replaced if necessary. After verification, the respective companies issue quality / guarantee certificates for the extinguishers in question.

4.4.2. Canopus

<i>Fire safety activities</i>	<i>Mandatory frequency</i>	<i>Execution dates</i>
<i>Exercises in case of fire</i>	<i>Annually</i>	<i>Annual schedule</i>
<i>Inspection and certification of electrical and mechanical fire detection and extinguishing systems.</i>	<i>Quarterly</i>	* PRAM Bulletins: 27.04.2021 19.10.2021 * Office building fire system overhaul 04.06.2021 16.12.2021 * Overhaul of grain storage fire system 04.06.2021 16.12.2021
<i>Portable fire extinguisher inspection, refilling / recharging</i>	<i>Annually</i>	Series 1- jan. 2021 Series 2 – jul. 2021 Series 3 – sept.2021

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4.4.3. Cernavodă Shipyard

<i>Fire safety activities</i>	<i>Mandatory frequency</i>	<i>Execution dates</i>
<i>Exercises in case of fire</i>	<i>Quarterly</i>	<i>March 2021 November 2021</i>
<i>Inspection and certification of electrical and mechanical fire detection and extinguishing systems.</i>	-	-
<i>Portable fire extinguisher inspection, refilling / recharging</i>	<i>Annually</i>	<i>08.03.2021</i>

4.4.4. TTS Operator

<i>Fire safety activities</i>	<i>Mandatory frequency</i>	<i>Execution dates</i>
<i>Exercises in case of fire</i>	<i>Annual</i>	<i>25-29.06.2021</i>
<i>Inspection and certification of electrical and mechanical fire detection and extinguishing systems.</i>	<i>Under the OHS / PSI / Environment Agreement between TTS Operator and Canopus, the responsibility for checking the PSI equipment rests entirely with the owner - Canopus</i>	
<i>Portable fire extinguisher inspection, refilling / recharging</i>		

4.4.5. TTS

<i>Fire safety activities</i>	<i>Mandatory frequency</i>	<i>Execution dates</i>
<i>Exercises in case of fire</i>	<i>Annually</i>	<i>07.10.2021</i>
<i>Inspection and certification of electrical and mechanical fire detection and extinguishing systems.</i>	<i>Annually</i>	<i>24.06.2021</i>
<i>Portable fire extinguisher inspection, refilling / recharging</i>	<i>Annually</i>	<i>November 2021</i>

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4.4.6. TTS Fluvial

Fire safety activities	Mandatory frequency	Execution dates
Exercises in case of fire	Annually	18.03.2021, 22.03.2021, 31.03.2021 11.06.2021, 14.06.2021, 25.06.2021 14.09.2021, 01.11.2021, 02.11.2021 26.11.2021, 02.12.2021, 03.12.2021 13.12.2021
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	-	-
Portable fire extinguisher inspection, refilling / recharging	Annually	05.03.2021, 24.03.2021. 23.04.2021, 11.05.2021, 11.06.2021 17.06.2021, 02.07.2021, 06.08.2021 18.08.2021, 09.09.2021, 23.09.2021, 24.09.2021, 27.10.2021 04.11.2021, 05.11.2021

4.5. Work accidents

4.5.1. Navrom

Type of accident	Date	Description	Documents	Aviso	Measures taken
Temporary disability	16.02.2021	Staff involved: helmsman on Mercury 306 Activity: mooring maneuver Place: Chernavoda Shipyard Injuries: poly-trauma	FIAM investigation file	Aviso Decizion Inv.gr.III	-processing research report; - risk reassessment; - PPP update
Temporary disability	28.05.2021	Staff involved: Mercury sailor 209. Activity: reconfiguration of the convoy Loc: Dunaujvaros (HU) Injuries: severe pain in the left knee. After examination and medical assistance, the sailor received permission to return to the ship.	Investigation file	Aviso	-processing research report; - risk reassessment; - PPP update
Temporary disability	25.08.2021	Personnel involved: Mercury sailor 303.	Investigation file	Aviso	-processing research report;

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Type of accident	Date	Description	Documents	Aviso	Measures taken
		Activity: convoy training Place: Cernavoda harbor Injuries: Injury to the little finger of the right hand. After examination and medical assistance, the sailor received permission to return to the ship.			- risk reassessment; - PPP update
Deceased	06.11.2021	Staff involved: Mercury sailor 209. Activity: disappeared while the convoy was anchored at Km 793 Danube, Calafat port road. On 20.01.2022, the dead body was found.	Documents requested by the Calafat Naval Transport Police	-	- case processing

4.5.2. TTS Fluvial

Type of accident	Date	Description	Documents	Aviso	Measures taken
Temporary disability	06.12.2021	Staff involved: port worker Activity: mechanized unloading of goods Place: port Drobeta Tr. Severin Injuries: back bumps and falling pelvis	- Event research file - event research report - FIAM for verification and approval - FIAM for registration	Approval of research file	- Sanctioning two employees with a written warning - Processing the research report - Supplementing the regular training of port workers - Review the OSH worker risk assessment of docker - Revision and completion of the prevention and protection plan on the branch / office where port workers (dockers) are employed

5. Fuel and energy consumption and CO2 emissions

5.1. NAVROM fleet

Due to its specific activity, the NAVROM fleet produces over 90% of the CO2 emissions of the companies in the monitoring perimeter. For this reason, the consumption, emissions and efficiency indicators of the fleet are presented separately.

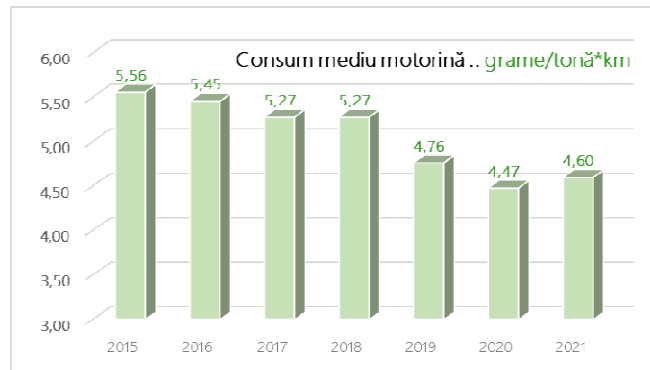
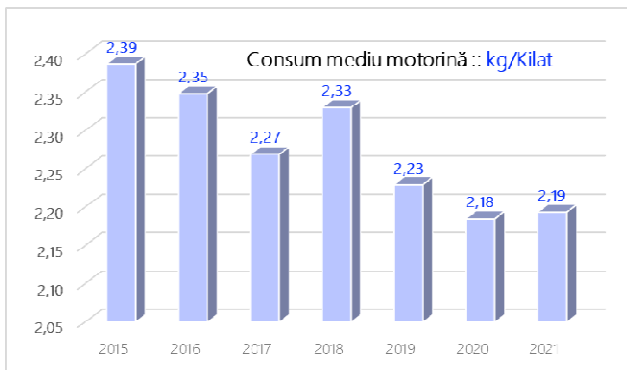
5.1.1. Liquid fuel consumption

<u>Aggregate diesel consumption [tons]</u>	2021	2020	2019	2018	2017	2016	2015	2014
Pushers	17.598,9	17.039,6	19.419,5	16.528,5	17.714,5	16.270,3	17.985,6	16.550,6
Line and maneuvering ships	1.661,3	1.884,3	2.146,2	2.594,1	2.553,3	3.350,2	4.448,9	3.447,9
Total propelled ships	19.260,2	18.923,6	21.565,7	19.122,5	20.267,8	19.620,6	22.434,6	20.028,4
Other consumers	868,4	957,2	850,6	1.326,6	1.345,2	1.259,4	1.512,77	1.322,2
Total NAVROM fleet	20.128,6	19.880,8	22.416,2	20.449,1	21.612,9	20.879,0	23.947,2	21.350,7

<u>Average diesel consumption</u>	2021	2020	2019	2018	2017	2016	2015
Aggregate consumption of diesel propulsion vessels [tons]	19.260,2	18.923,6	21.565,7	19.122,5	20.267,8	19.620,6	22.434,6
Physical journey performed [thousand tons * km]	4.189.425	4.228.998	4.533.089	3.626.731	3.844.273	3.597.869	4.038.411
Work done [kilot]	8.781.509	8.661.075	9.675.075	8.206.762	8.932.878	8.356.059	9.399.623
Average diesel consumption							
[grams / ton * km]	4,60	4,47	4,76	5,27	5,27	5,45	5,56
[kg/kilot]	2,19	2,18	2,23	2,33	2,27	2,35	2,39

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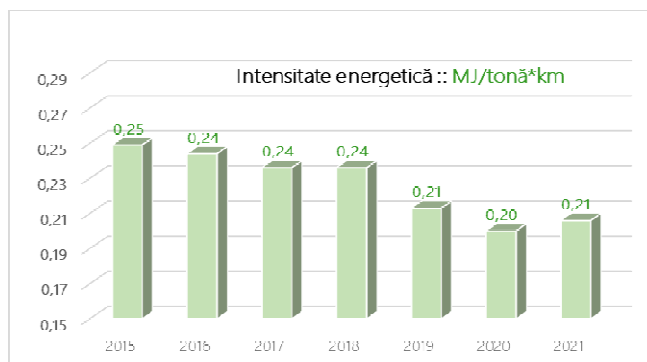
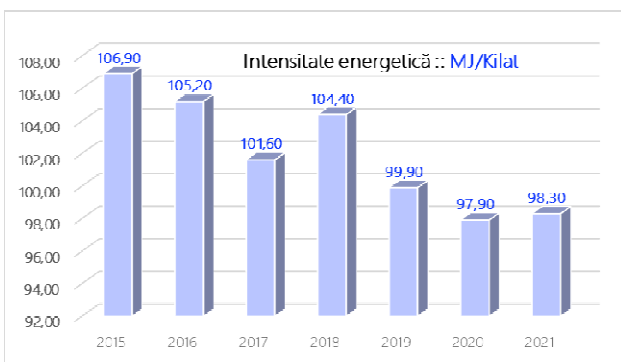
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5.1.2. Energy intensity

Energy consumption and energy intensity	2021	2020	2019	2018	2017	2016	2015
Aggregate consumption of diesel propulsion vessels [tons]	19.260,2	18.923,6	21.565,7	19.122,5	20.267,8	19.620,6	22.434,6
Equivalent energy consumption [TJ]	862,9	847,8	966,1	856,7	908,0	892,7	1.005,1
Physical journey performed [thousand tons * km]	4.189.425	4.228.998	4.533.089	3.626.731	3.844.273	3.597.869	4.038.411
Work done [kilat]	8.781.509	8.661.075	9.675.075	8.206.762	8.932.878	8.356.059	9.399.623
Energy intensity							
[MJ/tons*km]	0,206	0,200	0,213	0,236	0,236	0,244	0,249
[MJ/kilat]	98,3	97,9	99,9	104,4	101,6	105,2	106,9

Note: Diesel calorific value: 44.8 MJ / Kg (source: https://ro.frwiki.wiki/wiki/Pouvoir_calorique).

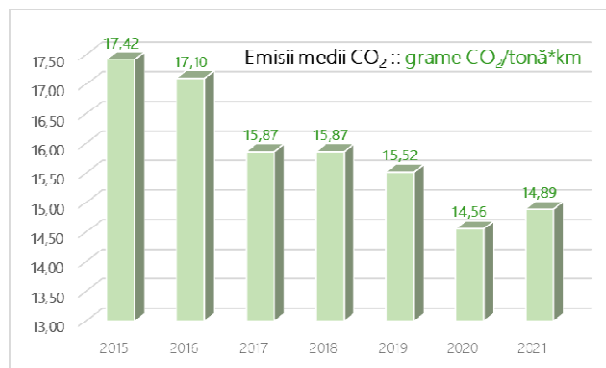
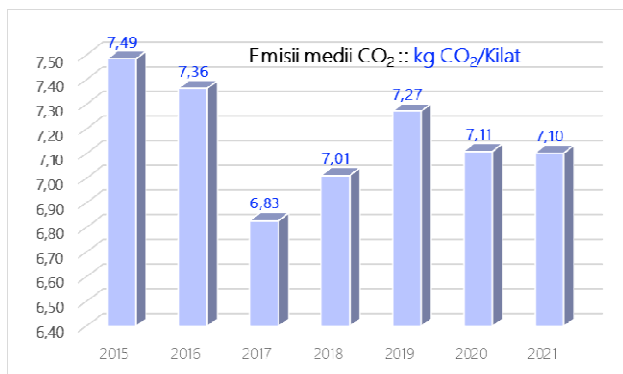


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5.1.3. CO2 emissions from propelled ships

	2021	2020	2019	2018	2017	2016	2015
CO2 emissions powered by ships [tons]	62.382	61.581	70.352	57.549	60.996	61.536	70.361
Physical journey performed [thousand tons * km]	4.189.425	4.228.998	4.533.089	3.626.731	3.844.273	3.597.869	4.038.411
Work done [kilot]	8.781.509	8.661.075	9.675.075	8.206.762	8.932.878	8.356.059	9.399.623
Average CO2 emissions							
[grams/ton*km]	14,89	14,56	15,52	15,87	15,87	17,10	17,42
[kg/kilot]	7,10	7,11	7,27	7,01	6,83	7,36	7,49



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5.2. Companies in the monitoring perimeter

5.2.1. Energy consumption

	TTS	Navrom	TTS Operator	TTS Fluvial	Cernavoda Shipyard	Canopus	TOTAL
Diesel consumption [tons]	7,6	20.190,3	1.120,6	48,8	19,6	6,3	21.393,2
Diesel equivalent energy consumption [TJ]	0,34	904,52	50,20	2,19	0,88	0,28	958,41
Gasoline consumption [tons]	2,55	2,44	3,25	2,91	0,77	0	11,90
Gasoline equivalent energy consumption [TJ]	0,12	0,12	0,15	0,14	0,04	0,0	0,57
Natural gas consumption [thousand m3]	25,25	42,73	0	112,92	0	202,10	383,00
Natural gas equivalent energy consumption [TJ]	0,99	1,68	0	4,43	0	7,93	15,03
Electricity consumption [MWh]	117,0	864,8	238,9	1.079,0	423,3	2.149,6	4.872,7
Energy equivalent energy consumption [TJ]	0,42	3,11	0,86	3,88	1,52	7,74	17,53
Total energy consumption [TJ]	1,87	909,43	51,21	10,64	2,44	15,95	991,54

Note Diesel calorific value: 44.8 MJ / Kg, Diesel calorific value: 47.3 MJ / Kg (source: https://en.fwiki.wiki/wiki/Pouvoir_calorique), Calorific value of natural gas: 10.9 kWh / m3, conversion factor: 1 kWh = 3.6 MJ

5.2.2. Emisii CO2

Liquid fuels consumption and CO2 emissions	TTS	Navrom	TTS Operator	TTS Fluvial	Cernavoda Shipyard	Canopus	TOTAL
Diesel consumption (tons)	7,6	20.190,3	1.120,6	48,8	19,6	6,3	21.393,2
Diesel CO2 emissions (tons)	23,8	63.322,8	3.514,5	153,1	61,5	19,8	67.095,5
Gasoline consumption (tons)	2,55	2,44	3,25	2,91	0,77	0	11,9
CO2 emissions from petrol (tons)	7,8	7,5	10,0	8,9	2,4	0,0	36,5
Total CO2 emissions (tons)	31,6	63.330,3	3.524,5	162,0	63,9	19,8	67.132,0

Note: CO2 from diesel / petrol combustion (kgCO2) = amount of diesel / petrol (liters) x FE (Kg CO2 / liter);
 FE gasoline = 2.3 KgCO2 / liter; FE diesel = 2.7 KgCO2 / liter;

Natural gas - consumption and CO2 emissions	TTS	Navrom	TTS Operator	TTS Fluvial	Cernavoda Shipyard	Canopus	TOTAL
Natural gas consumption (thousand m3)	25,25	42,73	0	112,92	0	202,10	383,00
CO2 emissions from natural gas (tons)	51,4	86,9	0	229,7	0	411,1	779,1

Note: CO2 resulting from natural gas combustion (tonsCO2) = Quantity of natural gas consumed (m3) x PCN (TJ / m3) x FE (tons CO2 / TJ), PCN in Romania = 36.58 MJ / m3 (national value), FE in Romania = 55.61t CO2 / TJ (national value)

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Electricity consumption and CO2 emissions	TTS	Navrom	TTS Operator	TTS Fluvial	Cernavoda Shipyard	Canopus	TOTAL
Electricity consumption (MWh)	117,0	864,8	238,9	1,079,0	423,3	2.149,6	4.872,7
Indirect CO2 emissions from electricity (tons)	31,0	228,9	63,3	285,6	112,0	569,0	1.290,0
Note: CO2 resulting from electricity consumption (gCO2) = electricity consumption (KWh) x FE (gCO2 / KWh); FE (gCO2 / KWh) = 264.69 According to the National Regulation on the Labeling of Electricity, revision 1, approved by the Order of the President of ANRE, 0.3709tCO2 / KWh http://www.anre.ro/ro/energie-electrica/rapoarte							

6. Waste management

Canopus

Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Household waste	20.03.01	mc	211,9	211,9	S.C. Salport S.A
Technologically biodegradable waste	20.02.01	mc	1313	1313	
Paper and cardboard	20.01.01	kg	119	119	S.C. Greentech Servicii Ecologice
Paper and cardboard packaging	15.01.01	kg	178	178	
Plastic packaging	15.01.02	kg	54	54	
Plastic materials	20.01.39	kg	10	10	
Scrapped equipment	16.02.14	kg	35	35	
Printer toners	08.03.17*	kg	34	34	
Wooden packaging	15.01.03	kg	1578	1578	Handover report Criciu Dumitru
Lighting equipment	20.01.21*	kg	38	38	S.C. Recolamp S.R.L.

TTS Fluvial

Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Household waste	20 03 0	mc	33,200	33,200	SP ECOSAL
Paper and cardboard packaging	15 01 01	to	0,012	0,012	SP ECOSAL
Plastic packaging	15 01 02	to	0,055	0,055	SP ECOSAL
Waste water	13 04 01	mc	3,300	3,300	APDM GL
Waste oils	13 04 01	to	2,97	2,97	APDM GI

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TTS Operator

Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Used Vaseline	13 08 99*	to	1,470	1,470	Sc Greentech Servicii Ecologice
Hazardous waste packaging	15 0110*	to	0,040	0,040	
Oil and diesel filters	16 01 07*	to	0,280	0,280	
Mineral oils	13 02 05*	to	5,910	5,910	
Battery waste	16 06 01*	to	0,160	0,160	
Household waste	20 03 01	to	26,645	26,645	SC Salport SA
Paper and cardboard	20 01 01	to	0,280	0,280	Greentech Servicii Ecologice
Paper and cardboard packaging	15 01 01	to	0,040	0,040	
Printer toner waste	08 03 17*	to	0,042	0,042	
Waste water	13 04 03*	to	55,000	55,000	CNAMPC- Nave Tehnice Port Constanta
Other engine oils, transmission and lubrication	13 02 08*	to	0,160	0,160	Sc Greentech Servicii Ecologice
Scrapped equipment	16 02 14	to	0,015	0,015	
Plastic	15 01 02	to	0,025	0,025	
Fluorescent tubes	20 02 21*	to	-	-	
Ferrous metals	16 01 17	to	1886,03	1886,03	

Navrom

Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Used oil	13.02.05*	to	76,467	76,467	A.P.D.M. S.A. Galați
					A.P.M. Constanța
					A.P.D.F. Giurgiu-port Călărași
					Port Bratislava
					Port Budapesta
					Port Regensburg
Waste water	13.04.01*	to	328,250	328,250	A.P.D.M. S.A. Galați
					A.P.D.P.Giurgiu-port Giurgiu
					A.P.D.F. Giurgiu-port Dr.Tr.Severin
					A.P.D.M. S.A. Galați –port Brăila
					Port Bratislava
					Port Budapesta
					Port Regensburg
Oil filters	16.01.07*	to	3,981	3,981	A.P.M. Constanța
					A.P.D.M. S.A. Galați

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Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
					S.C. Sara Transport S.R.L. Port Regensburg
Scrap iron	16.01.17	to	7,530	7,530	S.C. EcoMetalRecycling S.R.L.
Worn batteries	16.06.01	to	6,680	6,680	S.C. ZETAS BATROM IMPEX S.R.L. ROMBAT
Paper	20.01.01	to	3,533	3,533	A.P.D.M. Galați S.C. EcoMetalRecycling S.R.L. S.C. Sara Transport S.R.L.
Plastic	15.01.02	to	0,196	0,196	A.P.D.M. S.A. Galați Ecosal Galati
Household waste	20.03.01	to	95,520	95,520	ECOSAL Galati A.P.D.M. S.A. Galați S.C. JT Grup SRL A.P.D.F. Giurgiu-port Cernavodă A.P.D.F. Giurgiu-port Giurgiu S.C. Best NicMarine S.R.L. Port Budapesta S.C. Salport S.A.
Waste electrical and electronic equipment	20.01.36	to	2,084	2,084	S.C. EcoMetalRecycling S.R.L.
Contaminated packaging	15.01.10*	to	0,249	0,249	Port Regensburg Port Bratislava S.C. Sara Transport SRL
Hydrocarbon-soaked cloths	15.02.02*	to	1,002	1,002	A.P.D.M. S.A. Galați Port Regensburg A.P.M. S.A. Constanța S.C. Sara Transport S.R.L. Port Bratislava Port Budapesta
Printer toners	08.03.18	to	0,067	0,067	S.C. TinFactory S.R.L. Sara Transport SRL
Cardboard packaging	15.01.01	to	0,357	0,357	ECOSAL Galati
Textile waste	15.02.03	to	0,260	0,260	S.C. EcoMetalRecycling S.R.L.
Edible oils and fats	20.01.25	to	0,770	0,770	S.C. Pucio Proverde IMD S.R.L.,
Used filters	15.02.03	to	0,450	0,450	S.C. Eco Bio Magic S.R.L. Sara Transport SRL
Fluorescent tubes	20.01.21*	to	0,088	0,088	Asociația RECOLAMP

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Cernavoda Shipyard

Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Household waste	20.03.01	to	18,13	18,13	Utilitati publice Gospodarie comunala
Metal filings and chippings	12.01.01	to	2	2	MSD COM BUZAU
Glass packaging	15.01.07	kg	50	50	RCV Industry SRL
Textile waste	15.02.02*	to	0.4	0.4	SARA TRANSPORT
Paper	15.01.01	kg	165	165	Sara Transport RCV Industry
Packaging containing residues or soaked in dangerous substances	15.01.10*	kg	510	510	Sara Transport
Printer toners	08.03.17*	to	0.01	0.01	SARA TRANSPORT
Iron and steel	17.04.05	to	160.480	160.480	MSD COM BUZAU
Plastic	15.01.02	kg	200	200	Sara Transport RCV Industry
Waters contaminated with oil	13.05.07*	to	0.86	0.86	SARA TRANSPORT
Gas discharge lamps	20.01.21*	to	0.04	0.04	VASTIM ECO TREND
Absorbents, filtered materials	15.02.03	to	0.55	0.55	SARA TRANSPORT
Slurry from the tanks	05.01.03*	to	0.94	0.94	SARA TRANSPORT
Used bilge oil	13.04.01*	to	0.4	0.4	SARA TRANSPORT
Used oil	13.02.05*	to	0.82	0.82	SARA TRANSPORT



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TRANSPORT TRADE SERVICES S.A.
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Waste	Waste code	UM	Quantity generated	Recycled quantity	Authorized recycling companies
Household waste	20 03 01	to	6,60	6,60	SUPERCOM SA,
Paper and cardboard packaging	15 01 01	to	0,361	0,361	SUPERCOM
Plastic packaging	15 01 02	to	0,260	0,260	SUPERCOM
Fluorescent tubes and other mercury-containing wastes	20.01.21*	to	0,0068	0,0068	Asociatia Ateliere fara Frontiere
Electrical and electronic equipment waste	16 02 14	to	0,028	0,028	Asociatia Ateliere fara Frontiere