



**TTS**  
**TRANSPORT TRADE SERVICES S.A.**  
**BUCUREȘTI – ROMÂNIA**



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# ANNUAL EHS MONITORING REPORT

Reporting period: 01/01/2022 – 31/12/2022

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## 1. Reporting Framework

TTS (Transport Trade Services) S.A. ("TTS") implemented since 2012 an internal system for monitoring the main aspects of environmental protection and occupational health and safety at the level of TTS Group..

This process is materialized through an Annual EHS Monitoring Report ("EHS Report") which documents how TTS and a number of subsidiaries with a significant impact at the group level deal with the issues they face in terms of environmental protection, safety and occupational health and emergency situations. The first report elaborated was the one regarding the year 2014.

EHS reports cover the period from January 1 to December 31 of each calendar year.

The beneficiaries of the EHS Report are the members of the management of TTS and the monitored subsidiaries - BoD and executive management, who thus have at their disposal a tool based on 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/>), a company accredited ISO 14065/2013 by RENAR for the verification of greenhouse gas emission reports and ton-kilometer data according to Implementing Regulation (EU) 2018/2067 (the "Consultant").

Report date: June 30, 2023

## 2. Monitoring perimeter

The companies covered by the 2022 EHS Report are as follows:

Name	Main activities	Main and secondary offices
<i>TTS (Transport Trade Services) S.A. ("TTS")</i>	<i>Shipment of goods</i>	<i>București, Giurgiu, Oltenița, Bechet</i>
<i>CNFR Navrom S.A. ("Navrom")</i>	<i>Naval transport on the Danube</i>	<i>Galați, Drobeta-Turnu Severin, Constanța</i>
<i>TTS Operator S.R.L. ("TTS Operator")</i>	<i>Direct transshipment of bulk and packaged goods</i>	<i>Constanța</i>
<i>TTS Porturi Fluviale S.A. ("TTS Fluvial")</i>	<i>Port operation</i>	<i>Galați, Brăila, Drobeta-Turnu Severin</i>
<i>Canopus Star S.R.L. ("Canopus")</i>	<i>Grain port terminal operation</i>	<i>Constanța</i>
<i>NAVROM Shipyard S.R.L. ("NAVROM Shipyard")</i>	<i>Ship repairs</i>	<i>Galați, Cernavodă</i>

### 3. Management systems and performance standards

#### 3.1. Management standards evaluated and certified:

	ISO 9001	ISO 14001	ISO 45001	ISO 22000
TTS	<i>TIC 15100127867 Valid certificate 17.02.2021- 30.01.2024 (TÜV Thüringen)</i>	NO	NO	NO
Navrom	<i>16.11.2020 / 73 100 5711 / TÜV Hessen</i>	<i>16.11.2020 / 73 104 5711 / TÜV Hessen</i>	<i>09.12.2020 / 73 117 5711 / TÜV Hessen</i>	NO
TTS Operator	<i>RO2019.101.042Q /19.08.2019</i>	<i>RO2019.101.042.E /19.08.2019</i>	<i>RO2019.101.042.S /04.08.2020</i>	NO
TTS Fluvial	<i>10.11.2020 / C00111- N-R / Business Quality Cert</i>	<i>10.11.2020 / M00046-R / Business Quality Cert</i>	<i>10.11.2020 / SM00033-R / Business Quality Cert</i>	<i>10.11.2020 / SA00006-R / Business Quality Cert</i>
NAVROM Shipyard	<i>DNV GL 09.06.2020 277120-2018-AQ- ROU-RvA</i>	<i>DNV GL 09.06.2020 277123-2018-AE- ROU-RvA</i>	<i>DNV GL 24.06.2020 209145-2016-AHSO- ROU-RvA</i>	NO
Canopus	NO	NO	NO	NO

#### 3.2. Organizational capacity and competence

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

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

In addition, at the level of each company, a person responsible for waste management is appointed, who has the obligation, according to the legal requirements in force, to keep records of waste management on a monthly basis, to report quarterly to the EHS manager of the group (Florian Niculae) and annually to the local authority of competent environment.

#### 3.3. The environmental objectives identified based on ISO 14001 for the year 2021:

<i>Company</i>	<i>Objective</i>	<i>Deadline</i>	<i>Measures of achievement</i>	<i>Achieved</i>
NAVROM	<i>Prevention of accidental pollution with serious consequences caused by the company's ships</i>	<i>Permanent</i>	<i>Acquiring by the crews the roles of preventing and combating accidental pollution and carrying out practical training.</i>	<i>100%</i>
			<i>Equipping ships with the necessary facilities and materials for intervention in case of accidental</i>	<i>100%</i>

<i>Company</i>	<i>Objective</i>	<i>Deadline</i>	<i>Measures of achievement</i>	<i>Achieved</i>
	<i>Reduction of noxious emissions</i>	<i>Permanent</i>	<i>pollution, including hydrocarbon absorbers</i>	
			<i>Maintaining propulsion equipment in normal operating parameters</i>	<i>100%</i>
			<i>Timely performance of revisions and repairs</i>	<i>100%</i>
			<i>The use of Euro 5 diesel or &lt;0.1% Sulfur.</i>	<i>100%</i>
	<i>Selective collection of waste at company headquarters and branches and on board ships</i>	<i>Permanent</i>	<i>Modernization of the fleet of powered ships and technical ships, with the replacement of engines with new generation ones, with low nox emissions:</i> - tugs Centaur 1 and Centaur 2 - floating crane 872	<i>100%<sup>1</sup></i>
			<i>Equipping with the necessary equipment;</i>	<i>100%</i>
			<i>Staff training</i>	<i>100%<sup>2</sup></i>
			<i>Signing contracts with collection companies, for all categories of generated waste;</i>	<i>100%</i>
	<i>Reducing the risks of pollution by the discharge of dangerous goods from transport ships</i>	<i>Permanent</i>	<i>Carrying out a waste audit and establishing the necessary measures to reduce the amount of waste generated</i>	<i>100%</i>
			<i>Regular staff training through specialized courses</i>	<i>100%</i>
<i>TTS Fluvial</i>	<i>Inspection of vessels that are to transport dangerous goods by ANR, according to ADN requirements</i>		<i>100%</i>	
	<i>Efficient utilization of waste</i>	<i>Permanent</i>	<i>Staff training on how to collect and store waste</i>	<i>100%</i>
	<i>Fulfillment of legal requirements regarding environmental pollution during grain handling at the grain delivery facility to the barge</i>	<i>12.2022</i>	<i>Installation of the shiploader awning structure</i>	<i>100%</i>
	<i>Reduction of losses during handling in the silo</i>	<i>February - May 2022</i>	<i>Replaced rubber sorters silo equipment</i>	<i>50%</i>
	<i>Reduction of losses during handling in the silo</i>	<i>May 2022</i>	<i>Replacement of spill protection devices</i>	<i>50%</i>
	<i>Responsible and safe disposal of waste</i>	<i>Permanent</i>	<i>Delivery of waste resulting from the exploitation of ships to authorized companies.</i>	<i>100%</i>
	<i>Selective collection of waste</i>	<i>12.2022</i>	<i>Delivery of waste resulting from the activity carried out at the headquarters (paper + cardboard, plastic packaging, etc.) to authorized companies</i>	<i>100%</i>
<i>TTS Operator</i>	<i>Monitoring waste management, reducing and valorizing them</i>	<i>annual</i>	<i>Promoting campaign:</i> - personal training - delivery of waste to specialized units, record of waste management according to legislation and reporting to ANM	<i>100%</i>
	<i>Identifying and keeping under control all environmental aspects resulting from the activity of TTS</i>	<i>Permanent</i>	<i>Evaluation of environmental aspects and compliance with legislation</i>	<i>realized</i>

<sup>1</sup> The engines were replaced and checked; there are still secondary works in tug. Centaur 1 and MP 872 which will be completed in February-March. 2023.

<sup>2</sup> PO - 18

<i>Company</i>	<i>Objective</i>	<i>Deadline</i>	<i>Measures of achievement</i>	<i>Achieved</i>
	OPERATOR			
	<i>Preparation for emergency situations and response capacity</i>	<i>Permanent</i>	<i>Identification of emergency situations and accidents that may have an impact on the environment - drawing up plans for emergency situations - personnel training with the Plan for emergency situations.</i>	<i>100%</i>
<i>Navrom Shipyard</i>	<i>Establishing and applying operational intervention measures to prevent and/or limit the effects on the environment in case of accidents or disasters</i>	<i>Permanent</i>	<i>Emergency situations/ incidents/ Environmental accidents produced per year =0 No. Simulations of emergency situations and response/planning capacity=1</i>	<i>100%</i>
	<i>Improving waste management by reducing, recovering, recycling and/or eliminating them, paying particular attention to hazardous waste</i>	<i>Permanent</i>	<i>Contracts concluded with specialized companies (licensed for hazardous waste collection) in handing over waste for each type of waste.</i>	<i>100%</i>
	<i>Monitoring of environmental factors</i>	<i>Permanent</i>	<i>The number of parameters related to the measurements / monitoring carried out for each one separately, without exceeding the admissible limits.</i>	<i>100%</i>
	<i>Identification of all legal provisions and other requirements regarding the environment related to the activities carried out</i>	<i>Permanent</i>	<i>The number of non-conformities detected during the conformity assessment should be decreasing or zero compared to the previous data</i>	<i>80%</i>
	<i>Ensuring a suitable working environment and reducing risks, drawing up the program of PSI measures and implementing it.</i>	<i>Permanent</i>	<i>No. PSI means (fire extinguishers, etc.) loaded and checked/no. PSI extinguishing media required</i>	<i>100%</i>
<i>Navrom Shipyard - Cernavoda location</i>	<i>Identifying and keeping under control all environmental aspects resulting from the activity</i>	<i>Permanent</i>	<i>Evaluation of environmental aspects</i>	<i>100%</i>
	<i>Reducing the environmental aspects produced by the activity carried out</i>	<i>Permanent</i>	<i>Use processes, practices, technologies that control and reduce environmental aspects</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 machinery attendants</i>	<i>100%</i>
	<i>Efficient management - natural and energy resources</i>	<i>Permanent</i>	<i>Use of natural lighting, rational use of protective equipment, recovery of batteries and used machine parts</i>	<i>95%</i>
	<i>Efficient management of substances and their storage containers (propane, used oils)</i>	<i>Permanent</i>	<i>Personal training, validity check and technical sheets, specific conditions, proper storage of containers</i>	<i>100%</i>
	<i>Monitoring of emergency management and response capacity</i>	<i>Permanent</i>	<i>Personnel training. Delivery of waste to specialized companies</i>	<i>100%</i>
	<i>Emergency preparedness and response capacity</i>	<i>Permanent</i>	<i>Identification of emergency situations with an impact on the environment, development of a plan and training for the SU</i>	<i>100%</i>

<i>Company</i>	<i>Objective</i>	<i>Deadline</i>	<i>Measures of achievement</i>	<i>Achieved</i>	
CANOPUS	Reducing environmental pollution	Permanent	1. Monthly reports on the cleaning of the terminal premises 2. Quarterly bulletins for waste water analysis 3. Quarterly bulletins for the analysis of sedimentable powders in the air	100%	
TTS	Establishing legal and regulated requirements	Permanent	Permanent updating of the documentary fund with the normative acts in force	100 %	
	Identification and evaluation of environmental aspects	Decembre 2022	Annual analysis and updating of the list of environmental aspects	100 %	
	Competence, training and awareness	Annual planning	Informing employees about the rules and internal regulations on environmental protection	100 %	
	Environment protection		Permanent	Selective collection and recovery of waste	100 %
			Annual	Waste management reporting to APM Bucharest	100 %
			Permanent	Compliance with the equipment/machinery maintenance schedule	100 %
			Trim. IV	Reducing electricity consumption by installing economical bulbs and neon lights	100 %

### 3.4. Evaluation of environmental aspects

<i>Company</i>	<i>Non-significant aspects</i>	<i>Significant aspects</i>	<i>Details of significant aspects</i>	<i>Measures to keep under control</i>
TTS	7	0	-	-
NAVROM	23 <sup>3</sup>	1	Transport of dangerous goods by inland waterways	Training of the personnel involved through expert courses in the transport of dangerous goods (ADN) Preparation of ships involved in the transport of dangerous goods, according to the ADN provisions. Appropriation and application of the PO-19 procedure on the transport of dangerous goods. Appropriation and application of the Accidental Pollution Prevention and Combat Plan (PS-01) and the Security Plan for the Transport of High-Risk

<sup>3</sup> 16 aspects can become significant in case of accidents, breakdowns or emergency situations.



<i>Company</i>	<i>Non-significant aspects</i>	<i>Significant aspects</i>	<i>Details of significant aspects</i>	<i>Measures to keep under control</i>
				<i>Goods (PS-02)</i>
<i>TTS Operator</i>	5	2 <sup>4</sup>	<i>Earthquake, flood, storm, blizzard, heavy rainfall, drought that could cause property damage or human life and environmental pollution</i>	<ol style="list-style-type: none"> <li>1. Event report</li> <li>2. Alarming intervention teams</li> <li>3. Rapid intervention to stop, spread and save lives</li> <li>4. Collaboration with the authorities and investigation of the causes</li> </ol>
<i>TTS Fluvial</i>	201	27	<p>23-generation of risk/explosion with impact on human health in emergency situations</p> <p>1-ship bilge water management</p> <p>3-water pollution with oil/ship fuel in emergency situations</p>	<ul style="list-style-type: none"> <li>- quality monitoring of handled, stored grains;</li> <li>-monitoring preventive maintenance program and technical equipment repair plan</li> <li>- delivery of bilge water to authorized agents as often as needed (APDM).</li> </ul>
<i>Navrom Shipyard</i>	-	122	<i>Abrasive suspension deposits</i>	<i>Specific measures managed by specialized personnel using monitoring and neutralization means.</i>
	-	61	<i>Slag deposits</i>	
	40	-	<i>Residual leaks</i>	
	34	-	<i>Emulsion and oil leaks</i>	
	30	-	<i>Paint packaging (soil pollution, noxious release)</i>	
	-	85	<i>Abrasive suspensions from polishing</i>	
	-	57	<i>Gas emanations from autogenous and electric welding</i>	
	-	85	<i>Suspensions of oxides in the air from autogenous cutting</i>	
	42	-	<i>Leaks of oil residues from piping installations</i>	
	-	61	<i>Leaks of emulsions and oils from chipping processing</i>	
	-	62	<i>Suspensions in the air appeared during the cleaning of the hull of the ship on Dock</i>	
	42	-	<i>Gases resulting from anti-corrosion protection</i>	
	30	-	<i>Slag resulting from electric welding</i>	

<sup>4</sup> Emergency situations due to natural and anthropogenic conditions

### 3.5. Preparation and response capacity in emergency situations

	<b>Intervention plan</b>	<b>Training plan</b>	<b>Proof of training</b>
TTS	<i>Emergency intervention plan</i>	<i>Annual training program 304/29.12.2021</i>	<i>Individual training sheets for fire protection and emergency situations</i>
Navrom	<i>- Security plan PS-03: Protection measures for emergency situations, - on board ships, the Roles for emergency situations apply (Fire, Man overboard, Damage - water hole, Abandonment or Pollution)</i>	<i>- PO-43-SU Organization of activities in the field of SU - IP-35-SU; organizing and conducting fire protection activities - Provision A21-7345/2021: emergency drills on board ships</i>	<i>- PO-44-SU Training of workers in the field of SU - Individual training sheets on the line of defense against fires and emergency situations</i>
TTS Operator	<i>Fire intervention plan</i>	<i>Training program 2022</i>	<i>Training report, SU/PSI training sheet</i>
NAVROM Shipyard	<i>Intervention plan for emergency situations, entered into force in 2018</i>	<i>Emergency training plan</i>	<i>Training report</i>
TTS Fluvial	<i>Fire intervention plans approved by the ISU for the operated ports: Galati, Brăila, Drobeta-Turnu Severin, Giurgiu, Oltenita</i>	<i>Annual training program</i>	<i>Individual training sheets for fire protection and emergency situations</i>
NAVROM Shipyard	<i>Action plan</i>	<i>Training plan in the SU field for the year 2022</i>	<i>Individual SU sheets, minutes of training, exercises</i>
Canopus	<i>Internal plan of action and intervention in emergency situations</i>	<i>Training program in the field of emergency situations</i>	<i>Exercise reports<sup>5</sup> SU sheets</i>

### 3.6. Inspections

#### ISU inspections

<b>Company</b>	<b>Emergency inspections</b>	<b>Identified non-conformities</b>	<b>Measures established</b>	<b>Follow-up actions</b>
<i>TTS Fluvial</i>	<i>ISU Mehedinți control report 04.07.2022</i>	<i>As per ISU Mehedinți control report 04.07.2022</i>	<i>As per ISU Mehedinți control report 04.07.2022</i>	<i>Answer to ISU Mehedinți: address nr. 1101TTS PF TS / 18.07.2022</i>
<i>Canopus</i>	<i>ISU control report nr.2454/22SUCT/ 05.10.2022</i>	<i>As per control report nr.2454/22SUCT/ 05.10.2022</i>	<i>As per control report nr.2454/22SUCT/05.10.2022 7 warnings without fines</i>	<i>Answer to ISU: Address nr.3708126/ 17.10.2022 6 warnings resolved and 1 in the process of being resolved. The budget was approved for the compliance of the changes made to the administrative building with the authorized situation..</i>

<sup>5</sup> fire simulation exercises

## Environmental inspections

<i>Company</i>	<i>Environmental inspections</i>	<i>Results</i>	<i>Follow-up actions</i>
<i>TTS Fluvial</i>	<i>Note of findings no. 522/11.08.2022 GNM Mehedinti Unplanned control to verify the conditions of the regulatory act at TTS PORTURI FLUVIALE SRL</i>	<i>1. In accordance with Law 104/2011 on ambient air quality, all measures will be taken to prevent, limit or reduce the impact on the environment when handling goods (coal, etc.). Term: Permanent measure 2. Appropriate management of goods/waste temporarily stored on the port platform with appropriate delimitation Deadline: 30.09.2022</i>	<i>Answer by Address no. 1468TTSPFTS/15.09.2022 According to Law 104/2011 on the quality of the surrounding air, all measures have been taken that lead to the prevention, limitation and reduction of the impact on the environment when handling goods handled through the Commercial Port: coal, iron ore, slag, fertilizers, etc.). - the training of the port staff regarding the full observance of the technological process of handling the goods mentioned above in order to avoid the generation of suspended powders in the surrounding air; -improving the maintenance activity of the means and handling equipment.</i>
<i>Navrom</i>	<i>In GALATI: Report no. 164/27.06.2022 Galati Environmental Guard</i>	<i>Updating the safety data sheets, the accidental pollution prevention plan, removing decommissioned equipment and handing it over to authorized operators and notifying the GNM of the completion of the measure.</i>	<i>Done.</i>
	<i>In Drobeta Turnu Severin: Report no. 578/10.10.2022 Mehedinți Environmental Guard</i>	<i>The reporting of the quantities of dangerous chemical substances and preparations managed will be sent to APM Mehedinti.</i>	<i>Done.</i>
<i>Navrom Shipyard</i>	<i>National Environmental Guard Inspection Report No. 210/13.09.2022</i>	<i>Environmental monitoring Waste management method Management of hazardous substances and hazardous waste</i>	<i>Handing over to an authorized company the expired dangerous chemical products in stock on the date of the control with the presentation to GNM Galati of the dispatch-transport forms according to HG 1061/2008</i>
<i>TTS Fluvial</i>	<i>Note of findings no. 522/11.08.2022 GNM Mehedinti Unplanned control to verify the conditions of the regulatory act at TTS PORTURI FLUVIALE SRL</i>	<i>-According to Law 104/2011 regarding the quality of the surrounding air, all measures will be taken to prevent, limit or reduce the impact on the environment when handling goods (coal, etc.). Term: Permanent measure -Proper management of goods/waste temporarily stored on the port platform with appropriate delimitation Deadline: 30.09.2022</i>	<i>Answer by Address no. 1468TTSPFTS/15.09.2022 According to Law 104/2011 on the quality of the surrounding air, all measures have been taken that lead to the prevention, limitation and reduction of the impact on the environment when handling goods handled through the Commercial Port: coal, iron ore, slag, fertilizers, etc.). - the training of the port staff regarding the full observance of the technological process of handling the goods mentioned above in order to avoid the generation of suspended powders in the surrounding air; -improving the maintenance activity of the means and handling equipment..</i>
<i>TTS Fluvial</i>	<i>Note of findings no. 831/17.11.2022</i>	<i>Informing APM Calarasi, ISUJ Calarasi and GNM CJ Calarasi</i>	<i>The goods and ferrous waste handled and temporarily stored on the port platform</i>

Company	Environmental inspections	Results	Follow-up actions
	GNM Calarasi Verification of the data from the Notification sent by the Company TTS PORTURI FLUVIALE SRL to SRAPM Calarasi, where it was registered with the number 12369 of 17.10.2022	when there is a significant increase in the quantity or a significant change in the nature or physical state of hazardous substances present on the site in accordance with Art. 7, paragraph 6 of Law no. 59/2016. Term: Permanent measure	were properly delimited to avoid contact between them and implicitly the production and propagation of a possible fire; The company that owns the ferrous waste was requested to sort and remove the combustible waste (plastics, textiles, rubber products, etc.) from the existing cargo stock in the port; The port staff was trained regarding compliance with the environmental legislation regarding the management and temporary storage of goods carried through the port No activity is taking place on the site on the date of the inspection. The stock of products on site at the date of the control is 0

## ITM inspections

Company	Inspection report	Inspection results	Non-conformities	Measures / way of solving
TTS Fluvial	Report 30922/01.02.2022 ITM Giurgiu (SSM)	-	Lack of internal controls on the OSH line	Carrying out internal controls at workplaces with written information from the employer. Address no. 759TTSPF/10.02.2022
	Report 80171/05.08.02022 ITM Galați (SSM)	-	-	-
	Report 29508/08.11.2022 ITM Braila (SSM)	Verbal warning	1. In the premises of the 0.4kv electrical station, two technological channels for the protection of the electrical cables are not covered with sheet metal covers along their entire length, there is a risk of stepping on the empty space; 2. In the mechanical workshop, the worker servicing the SN 400 type lathe does not have adequate information on the safe use of this work equipment; 3. In the premises of the unit, the permanent signaling of the means of first aid is not ensured to a sufficient extent	1. Protection with metal covers of the technological channels in the 0.4kv power station along the entire length; 2. Elaboration of instructions/worksheets 3. Completion of warning signs or obligation regarding the location and identification of first aid equipment within the premises of the unit. Address no. 2743 TTSPFBR/18.11.2022
Canopus	Report 1237/28.07.2022	NO	The document on protection against explosions was not drawn	Preparation of a document on

Company	Inspection report	Inspection results	Non-conformities	Measures / way of solving
			up (H.G.1058/2006)	protection against explosions according to H.G.1058/2006 (contract no. 184/04.10.2022)
Navrom	<u>Drobeta Branch:</u> Report no. 12492/ 23.02.2022 Mehedinti Territorial Labor Inspectorate	Compliance with the legal framework was verified.	There are OSH training sheets from TESA staff that show that the workplace training is not carried out by the direct supervisor of the workplace, but by the designated OSH worker.	Change in the sense of carrying out OSH training at the workplace by the direct manager of the workplace.
NAVROM SHIPYARD	Report 80201/10.06.2022	Compliance with the legal framework	NO	
	<u>Cernavoda branch</u> Report series CT no.24018/13.07.2022	Investigating the event of 23.08.2021	1. Locksmith work that involved working with an open fire was superimposed on painting work that generated volatile gases. The provisions of article 13 letter (a) of Law 319/2006 were violated. 2. The lack of necessary measures for the appropriate signaling of the area where ballast tank painting activities were carried out with warning/prohibition of access panels indicating the danger of fire/explosion. The provisions of art. 39 paragraph (a) and letter (k) of law 319/2006 were violated.	1. Fine in the amount of RON 4000i according to art. 39 paragraph 4 of law 319/2006 with subsequent amendments and additions. 2. Fine in the amount of RON 5000 according to art. 39 paragraph 9 of law 319/2006 with subsequent amendments and additions
	Report series CT no.24019/13.07.2022	Investigating the event of 23.08.2021	1. The Internal Prevention and Protection Service was NOT organized, contrary to the provisions of art. 18 paragraph (2) of Law 1425/2006. 2. The qualification of the workers regarding safety and health at work was NOT taken into account when work tasks were entrusted to Gâdea Marius Iulian and Poenaru Ionel without a welder qualification. The provisions of art. (7) paragraph 4 and letter (c) of Law 319/2006 were violated. 3. The activity of the workers Gâdea Marius Iulian and Poenaru Ionel was not verified by the higher ups. The provisions of art. 13 letter j) of law 319/2006 with subsequent amendments and additions were violated.	Sanctioned with a written warning according to art. 3 paragraph (2) letter (a) and art. 7 of OG 2/2001 with subsequent amendments and additions.

## Audits

Company	Internal audit	Non-conformities	Improvement measures	External audit	Non-conformities/Recommendations	Follow-up actions
Navrom	15.09.2022	Reorganization of the storage spaces, so that there are no more WEEE in the spaces intended for spare parts	Storage spaces for scrapped WEEE and more frequent scrapping (every 3-4 months) have been established to avoid collecting large quantities.	19.10.2022	Periodic request for environmental authorizations and annual approvals from collaborators, especially waste collection companies.	The activity was included in the plan of measures adopted after the external audit.
TTS	Internal audit report	-	<ul style="list-style-type: none"> <li>- for Canopus: Periodic maintenance and cleaning of equipment, machinery and outdoor spaces, annual preparation of the maintenance program;</li> <li>- for TTS:</li> <li>- Continue steps to obtain the fire authorization according to HG no. 571/2016 of the TTS headquarters.</li> <li>- Internal authorization of the electrician position according to Law 319/2006 Art 13, letter and with Art. 3.3.25 of Annex no. 1 to HG 1146/2006</li> </ul>	Audit extern		
TTS Fluvial	29.07-03.08.2022	-	-	16-17.08.2022 Supervisory audit 2	<ul style="list-style-type: none"> <li>- periodic reporting to the company management of the activities carried out by the process coordinators at the branches and work points, of the performances achieved and solutions to improve the activity</li> <li>- updating the certificates presented on the website in the "Certifications" section</li> </ul>	

Company	Internal audit	Non-conformities	Improvement measures	External audit	Non-conformities/Recommendations	Follow-up actions
					<ul style="list-style-type: none"> <li>- presentation on the website of the services offered in order to make the opportunities created by the conflict in Ukraine fruitful</li> <li>- updating the Register of Risks and Opportunities rev. 6 no. 1542TTSPF/31.03.2022, with the situation generated by the conflict in Ukraine</li> </ul>	
TTS Operator	YES	NO		27 -29.07.2022	<ul style="list-style-type: none"> <li>- updating the Plan of measures regarding the selective collection and waste management from 05.01.2021 as a result of the change in the legislation.</li> <li>- recording the last check of the installation in the Control Register for the detection, signaling, alarming, alerting, limiting and fire extinguishing installations.</li> </ul>	Solved
Navrom Shipyard	-	-	-	31.03.2022	Updating the Management Analysis	Management Analysis Planning

3.7. Relations with third parties

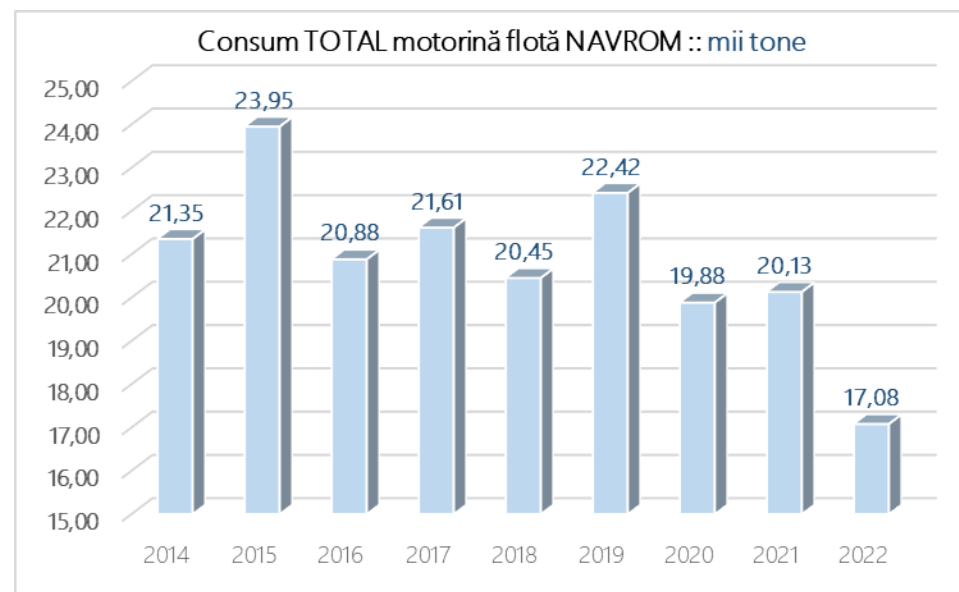
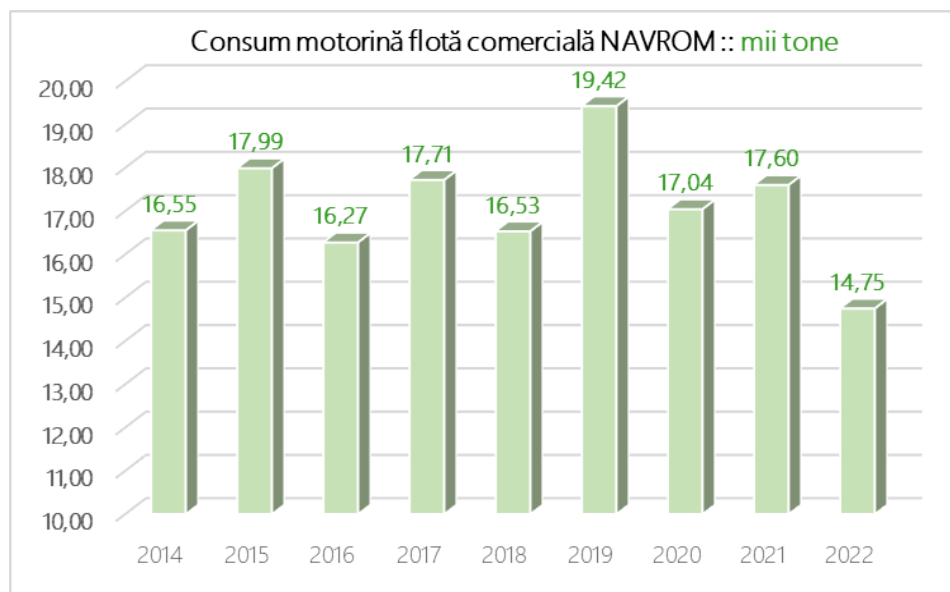
Company	Claims			
	Community	Neighbors	Clients	Suppliers
TTS	No	No	No	No
Navrom	No	No	<p>Depreciated goods: 18 complaints                      -damages = EUR 18,935.32 + RON 84,582.37, paid by NAVROM, of which RON 81,596.28 were recovered on the insurance policy;                      Missing goods when unloading: 6 complaints                      -damages = 21,018.60 RON and 12,228.00 EUR, of which 32,077.90 RON were recovered by insurance;                      Ships unfit for operation: 9 (no damage, the deficiencies identified initially have been remedied).                      Departure delays after loading: 1 complaint (without payment of damages).</p>	No
TTS Operator	No	No	No	No
TTS Fluvial	No	No	No	No
Canopus	No	No	No	No
Navrom Shipyard	No	No	No	No



## 4. Fuel and energy consumption

### 4.1. NAVROM fleet

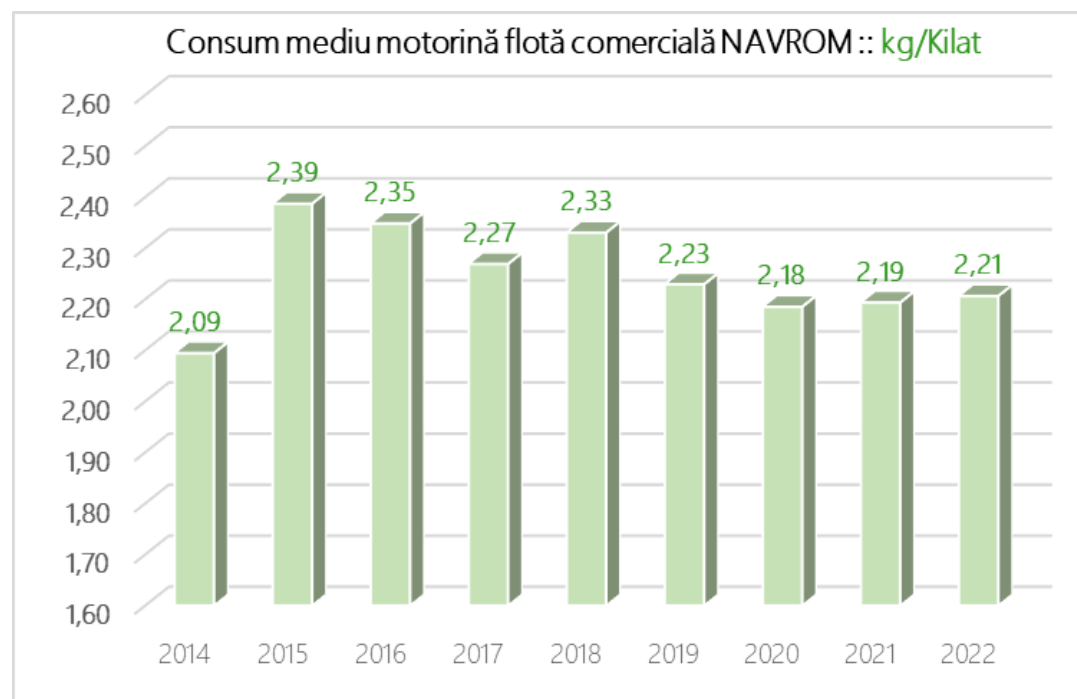
#### Diesel consumption



Diesel consumption [tons]	2014	2015	2016	2017	2018	2019	2020	2021	2022
Pushers	16.550,6	17.985,6	16.270,3	17.714,5	16.528,4	19.419,5	17.039,6	17.598,9	14.745,7
Ships of the line and maneuvering	3.477,9	4.448,9	3.350,3	2.553,3	2.594,1	2.146,2	1.884,0	1.661,3	1.444,6
<b>Commercial fleet consumption</b>	<b>20.028,4</b>	<b>22.434,6</b>	<b>19.620,6</b>	<b>20.267,8</b>	<b>19.122,5</b>	<b>21.565,7</b>	<b>18.923,6</b>	<b>19.260,2</b>	<b>16.190,3</b>
Other ships	1.322,2	1.512,7	1.259,4	1.345,2	1.326,6	850,5	957,2	868,4	887,3
<b>Total NAVROM fleet consumption</b>	<b>21.350,7</b>	<b>23.947,2</b>	<b>20.880,0</b>	<b>21.612,9</b>	<b>20.449,1</b>	<b>22.416,2</b>	<b>19.880,8</b>	<b>20.128,6</b>	<b>17.077,6</b>

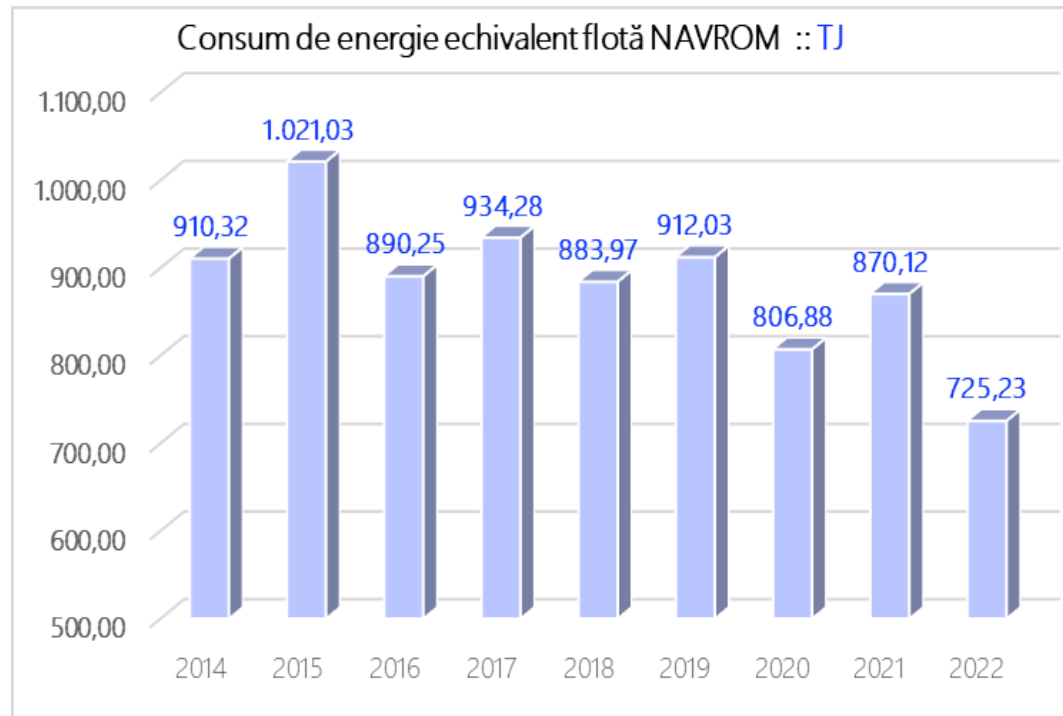
## Average commercial fleet diesel consumption

	2014	2015	2016	2017	2018	2019	2020	2021	2022
Commercial fleet diesel consumption [tons]	20.028,4	22.434,6	19.620,6	20.267,8	19.122,5	21.565,7	18.923,6	19.260,2	16.190,3
Physical distance traveled [thousand tons*km]	3.612.942	4.038.411	3.597.869	3.844.273	3.626.731	4.533.089	4.228.998	4.189.425	3.176.092
Work performed [kilats]	9.563.635	9.399.623	8.356.059	8.932.878	8.206.762	9.675.075	8.661.075	8.781.509	7.339.391
<b>Average diesel consumption</b>									
[kg/1.000 tons*km]	5,54	5,56	5,45	5,27	5,27	4,76	4,47	4,60	5,10
[kg/kilat]	2,09	2,39	2,35	2,27	2,33	2,23	2,18	2,19	2,21



## NAVROM total fleet equivalent energy consumption

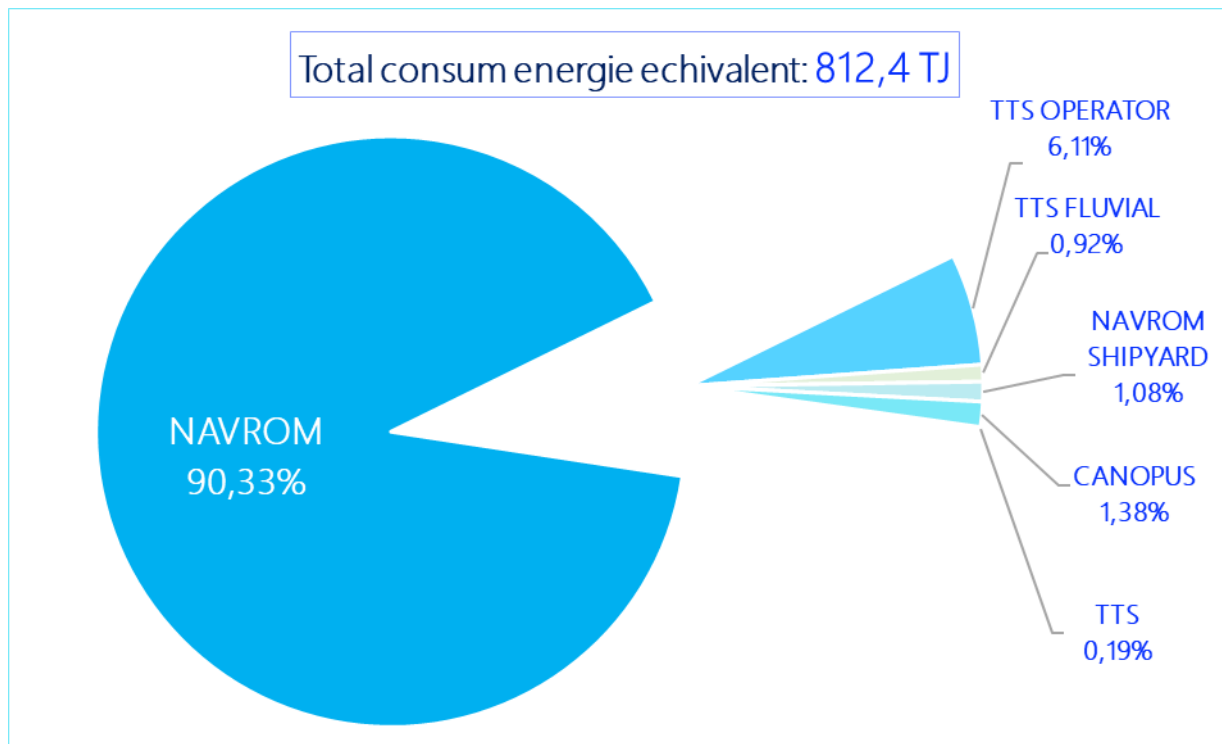
	2014	2015	2016	2017	2018	2019	2020	2021	2022
Total diesel fuel consumption NAVROM fleet [tons]	21.350,68	23.947,22	20.879,97	21.612,93	20.449,09	22.416,24	19.880,77	20.128,56	17.077,57
Diesel calorific value [MJ/Kg]	42,6366	42,6366	42,6366	43,228	43,228	40,686	40,586	43,228	42,467
<b>Total fleet equivalent energy consumption [TJ]</b>	<b>910,32</b>	<b>1.021,03</b>	<b>890,25</b>	<b>934,28</b>	<b>883,97</b>	<b>912,03</b>	<b>806,88</b>	<b>870,12</b>	<b>725,23</b>



4.2. The companies in the monitoring perimeter

Total equivalent energy consumption

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	TOTAL
Diesel fuel [tons]	5,60	17.186,0	1.147,0	37,75	65,16	5,16	18.446,6
Diesel calorific value: 42.467 GJ/ton							
Equivalent energy consumption [TJ]	0,238	729,8	48,71	1,60	2,77	0,219	783,4
Gasoline [tons]	3,22	3,92	3,51	2,99	8,68	0	22,33
Gasoline calorific value: 43.51 GJ/ton							
Equivalent energy consumption [TJ]	0,140	0,171	0,153	0,130	0,378	0	0,971
Natural gas [thousand m <sup>3</sup> ]	20,93	11,76	0	64,65	53,36	75,19	225,89
Natural gas calorific value: 36.51 MJ/m <sup>3</sup>							
Equivalent energy consumption [TJ]	0,764	0,429	0	2,36	1,95	2,75	8,25
Electricity [MWh]	103,5	935,5	207,3	944,1	1.020,7	2.281,5	5.492,6
Electricity conversion factor: 3.6 MJ/kWh							
Equivalent energy consumption [TJ]	0,373	3,37	0,746	3,40	3,67	8,21	19,77
<b>TOTAL Energy Consumption [TJ]</b>	<b>1,52</b>	<b>733,8</b>	<b>49,61</b>	<b>7,49</b>	<b>8,77</b>	<b>11,18</b>	<b>812,4</b>

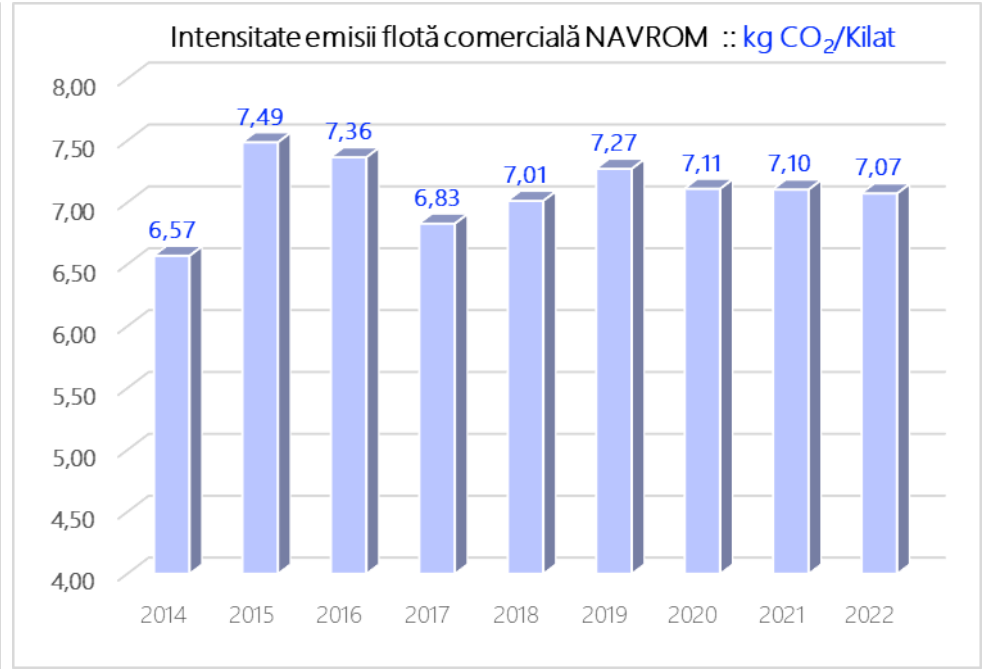
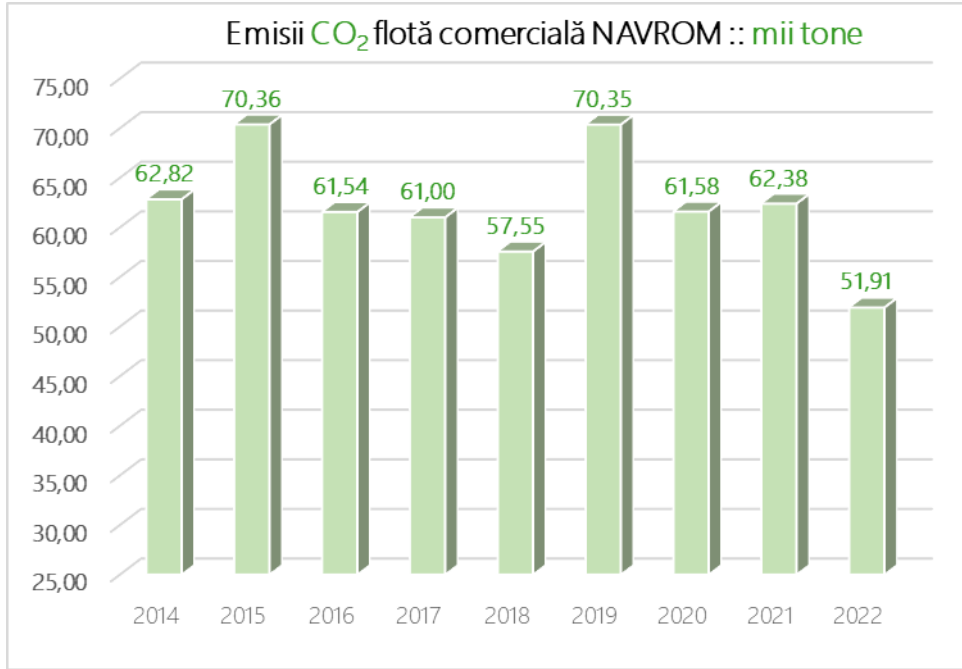


## 5. CO<sub>2</sub> emissions

### 5.1. NAVROM fleet

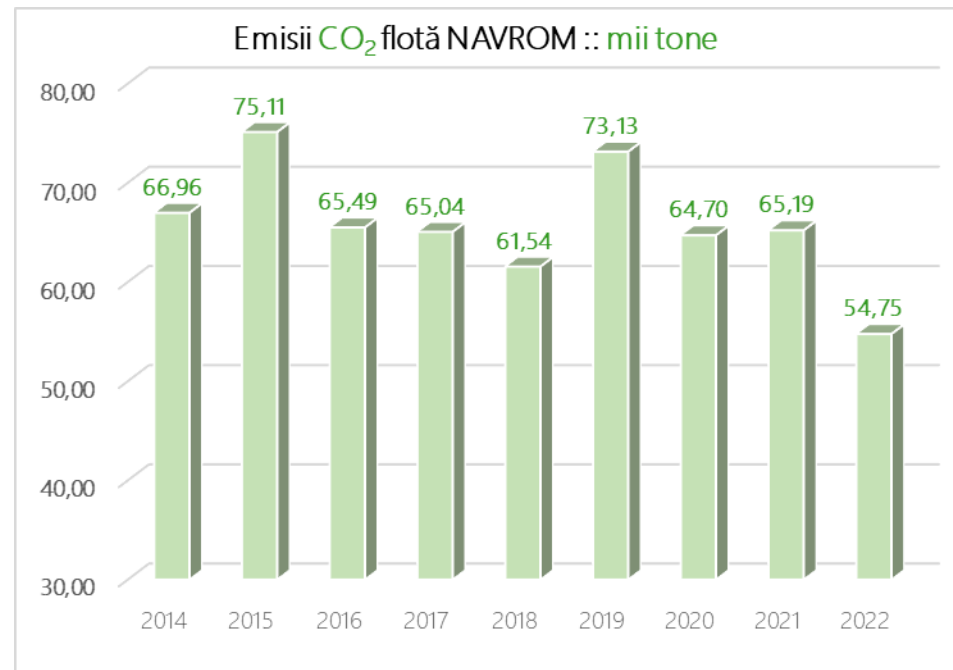
#### CO<sub>2</sub> emissions and commercial fleet CO<sub>2</sub> emission intensity

	2014	2015	2016	2017	2018	2019	2020	2021	2022
Commercial fleet diesel consumption [tons]	20.028,4	22.434,6	19.620,6	20.267,8	19.122,5	21.565,7	18.923,6	19.260,2	16.190,3
Emission factor [tons of CO <sub>2</sub> / tons of diesel]	3,1363	3,1363	3,1363	3,0095	3,0095	3,2622	3,2542	3,2389	3,2060
<b>CO<sub>2</sub> emissions [tons]</b>	<b>62.815,2</b>	<b>70.361,5</b>	<b>61.536,0</b>	<b>60.995,9</b>	<b>57.549,2</b>	<b>70.351,6</b>	<b>61.581,2</b>	<b>62.381,9</b>	<b>51.906,1</b>
Physical route of goods [thousand tons*km]	3.612.942	4.038.411	3.597.869	3.844.273	3.626.731	4.533.089	4.228.998	4.189.425	3.176.092
Work performed [kilats]	9.563.635	9.399.623	8.356.059	8.932.878	8.206.762	9.675.075	8.661.075	8.781.509	7.339.391
Intensity of CO <sub>2</sub> emissions									
[kg/1,000 tonnes*km]	17,39	17,42	17,10	15,87	15,87	15,52	14,56	14,89	16,34
<b>[kg/kilat]</b>	<b>6,57</b>	<b>7,49</b>	<b>7,36</b>	<b>6,83</b>	<b>7,01</b>	<b>7,27</b>	<b>7,11</b>	<b>7,10</b>	<b>7,07</b>



## Total NAVROM fleet CO<sub>2</sub> emissions

	2014	2015	2016	2017	2018	2019	2020	2021	2022
NAVROM fleet diesel fuel consumption [tons]	21.350,68	23.947,22	20.879,97	21.612,93	20.449,09	22.416,24	19.880,77	20.128,56	17.077,57
Emission factor [tons of CO <sub>2</sub> / tons of diesel]	3,1363	3,1363	3,1363	3,0095	3,0095	3,2622	3,2542	3,2389	3,2060
<b>CO<sub>2</sub> emissions [tons]</b>	<b>66.962,1</b>	<b>75.105,7</b>	<b>65.485,8</b>	<b>65.044,1</b>	<b>61.541,5</b>	<b>73.126,3</b>	<b>64.696,0</b>	<b>65.194,4</b>	<b>54.750,7</b>



5.2. The companies in the monitoring perimeter

Direct CO<sub>2</sub> emissions – Scope 1 GHG

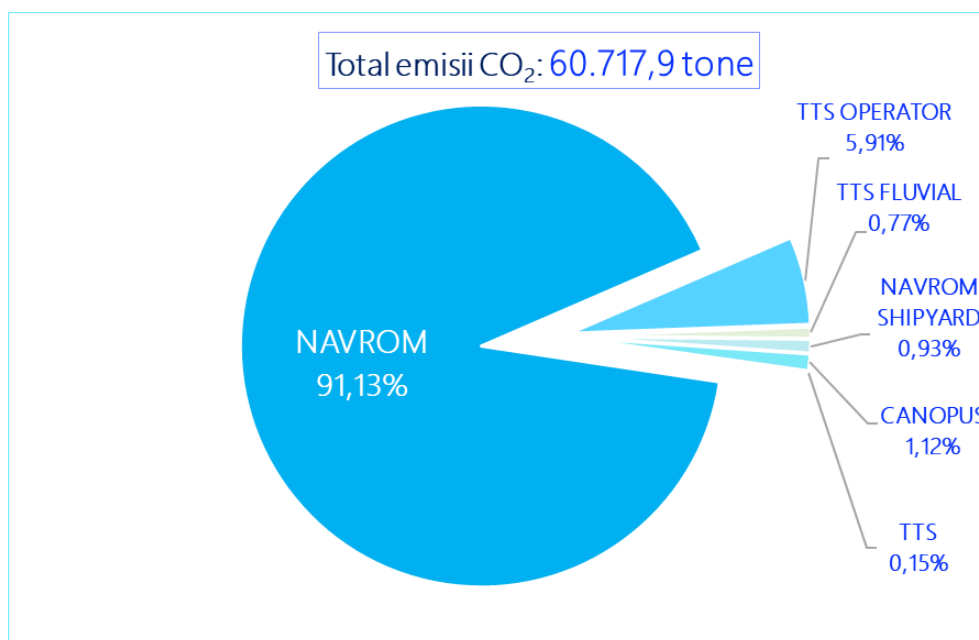
	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	TOTAL
Diesel consumption [tons]	5,60	17.186,0	1.147,0	37,75	65,16	5,16	18.446,6
Emission factors: for the fleet 3,206 t CO <sub>2</sub> / t diesel (Source: European Commission); for other mobile sources 3.077 t CO <sub>2</sub> / t diesel (Source: Ministry of the Environment)							
CO <sub>2</sub> emissions from diesel [tonnes]	17,24	55.084,4	3.529,4	116,2	200,5	15,88	58.963,6
Gasoline consumption [tons]	3,22	3,92	3,51	2,99	8,68	0	22,33
Emission factor: 3.116 tons of CO <sub>2</sub> / ton of gasoline (Source: Ministry of the Environment)							
CO <sub>2</sub> emissions from petrol [tonnes]	10,05	12,22	10,94	9,31	27,05	0	69,58
Natural gas consumption [thousand m <sup>3</sup> ]	20,93	11,76	0	64,65	53,36	75,19	225,9
Natural gas emission factor: 2,030 tons of CO <sub>2</sub> / m <sup>3</sup> of natural gas (Source: Ministry of the Environment)							
Natural gas CO <sub>2</sub> emissions [tons]	42,50	23,88	0	131,2	108,3	152,6	458,6
<b>Total direct CO<sub>2</sub> emissions [tons]</b>	<b>69,78</b>	<b>55.120,5</b>	<b>3.540,3</b>	<b>256,7</b>	<b>335,9</b>	<b>168,5</b>	<b>59.491,7</b>

Indirect CO<sub>2</sub> emissions – Scope 2 GHG

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	TOTAL
Electricity consumption [MWh]	103,5	935,5	207,3	944,1	1.020,7	2.281,5	5.492,6
Electricity emission factor: 223.25 g CO <sub>2</sub> / kWh (Source: ANRE)							
<b>Total indirect CO<sub>2</sub> emissions [tons]</b>	<b>23,10</b>	<b>208,8</b>	<b>46,28</b>	<b>210,8</b>	<b>227,9</b>	<b>509,3</b>	<b>1.226,2</b>

Total CO<sub>2</sub> emissions

	TTS	Navrom	TTS Operator	TTS Fluvial	NAVROM Shipyard	Canopus	TOTAL
<b>Total CO<sub>2</sub> Emissions [tons]</b>	<b>92,89</b>	<b>55.329,3</b>	<b>3.586,6</b>	<b>467,5</b>	<b>563,8</b>	<b>677,8</b>	<b>60.717,9</b>





## 6. Waste management

### Canopus

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Mixed municipal waste	20 03 01	mc	226.380	226.380	SALPORT S.A.
Technologically biodegradable waste	20 02 01	mc	566	566	Salport S.A., IRIDEX Grup Salubrizare SRL
Paper and cardboard	20 01 01	kg	89	89	Greentech Servicii Ecologice SRL
Paper and cardboard packaging	15 01 01	kg	89	89	
Plastic material packaging	15 01 02	kg	20	20	
Plastic materials	20 01 39	kg	1.190	1.190	
Scrapped equipment. other than those specified in 16 02 09 to 16 02 13	16 02 14	kg	20	20	
Printer toner waste containing hazardous substances	08 03 17*	kg	47	47	
Scrap iron	15 01 04	kg	450	450	
Wood waste	15 01 03	kg	1,992	1,992	PF Criciu Dumitru

### TTS Fluvial

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Mixed municipal waste	20 03 01	mc	170.088	170.088	ECO SA, Rosal Grup/United Waste Solutions, IRIDEX Group Salubrizare, Brantner Servicii Ecologice, APDM Galați
Biodegradable waste from kitchens and canteens	20 01 08	mc	2.380	2.380	
Paper and cardboard packaging	15 01 01	to	0.594	0.594	SP Ecosal, First Recycler, Bca Vio Service
Plastic material packaging	15 01 02	to	0.172	0.172	
Bilge oils	13 04 01*	mc	9	9	APDM Galați
Glass packaging	15 01 07	kg	15	15	SP Ecosal
Printer toner waste containing hazardous substances	08 03 17*	kg	3	3	First Recycler
Used tires	16 01 03	to	0.050	0.050	Eco Metal Recycler
Non-chlorinated mineral motor oils. transmission and lubrication	13 02 05*	to	0.050	0.050	First Recycler

### TTS Operator

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Used petroleum jelly	13 08 99*	to	1.120	1.120	Greentech Servicii Ecologice
Materials contaminated with hazardous substances	13 02 02*	to	0.760	0.760	

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Oil filters	16 01 07*	to	0.275	0.275	
Non-chlorinated mineral motor oils. transmission and lubrication	13 02 05*	to	2.8	2.8	
Battery waste	16 06 01*	to	0.188	0.188	Caranda Baterii SRL/MBC Auto SRL
Mixed municipal waste	20 03 01	to	26.172	26.172	Salport SA / IRIDEX
Paper and cardboard	20 01 01	to	0.343	0.343	Greentech Servicii Ecologice
Paper and cardboard packaging	15 01 01	kg	23	23	
Printer toner waste containing hazardous substances	08 03 17*	kg	2	2	
Bilge water	13 04 03*	to	0.053	0.053	CNAMPC- Nave Tehnice Port Constanta
Other motor oils. transmission and lubrication	13 02 08*	kg	30	30	
Scrapped equipment. other than those specified in 16 02 09 to 16 02 13	16 02 14	kg	83	83	Greentech Servicii Ecologice
Plastic	15 01 02	kg	15	15	
Ferrous metals	16 01 17	to	39.120	39.120	Steel Cems SRL/REMAT Constanta

## Navrom

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Non-chlorinated mineral motor oils. transmission and lubrication	13 02 05*	to	71.223	71.223	A.P.D.M. S.A. Galați, A.P.M. Constanța, A.P.D.F. Giurgiu (port Călărași, port Cernavodă; port Dr Tr. Severin), Port Bratislava, Port Budapesta, Port Regensburg
Bilge oils	13 04 01*	to	232.050	232.050	A.P.D.M. S.A. Galați, A.P.D.F..Giurgiu (port Călărași, port Cernavodă; port Severin), Port Bratislava, Port Budapesta, Port Regensburg, A.P.M. Constanța
Oil filters	16 01 07*	to	5.199	5.199	A.P.D.M. S.A. Galați, Sara Transport S.R.L., Port Regensburg, APDF Giurgiu (port Călărași, port Severin), Port Bratislava, Port Budapesta
Ferrous metals	16 01 17	to	17.430	17.430	S.C. EcoMetalRecycling S.R.L.
Used batteries	16 06 01	to	3.825	3.825	ZETAS BATROM IMPEX
Paper and cardboard	20 01 01	to	0.746	0.746	A.P.D.M. Galați, ECOSAL Galati, Sara Transport S.R.L.
Plastic materials	20 01 39	to	1.758	1.758	A.P.D.M. S.A. Galați, Ecosal Galati
Household waste	20 03 01	to	93.221	93.221	ECOSAL Galati, A.P.D.M. S.A. Galați , JT Grup SRL , A.P.D.F. Giurgiu (port Cernavodă, port Giurgiu), Port Budapesta, Port Bratislava,
DEEE	20 01 36	to	2.864	2.864	EcoMetalRecycling S.R.L.
Packaging that contains residues or is contaminated with dangerous substances	15 01 10*	to	0.477	0.477	Port Regensburg, Port Bratislava, A.P.D.F. Giurgiu (port Cernavodă, port Giurgiu), Port Budapesta

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Absorbents. filter materials (including oil filters without other specification). polishing materials. protective clothing contaminated with dangerous substances	15 02 02*	to	1.760	1.760	A.P.D.M. S.A. Galați, Port Regensburg, A.P.M. S.A. Constanța, Port Bratislava Port Budapesta, A.P.D.F. Giurgiu (port Severin)
Printer toners	08 03 18	to	0.1	0.1	EcoMetalRecycling S.R.L., Sara Transport SRL
Wood waste	20 01 38	to	0.790	0.790	ECOSAL Galati
Glass waste	16 01 20	to	0.025	0.025	A.P.D.M. S.A. Galați
Used antifreeze	14 01 14	to	0.647	0.647	A.P.D.F. Giurgiu (port Cernavodă)
TEXTILE	20 01 11	to	0.835	0.835	EcoMetalRecycling S.R.L.
Edible oils and fats	20 01 25	to	0.6	0.6	Puco Proverde IMD S.R.L.,
Absorbents. filter materials. polishing materials and protective clothing. other than those specified in 15 02 02	15 02 03	to	1.476	1.476	Port Budapesta, Sara Transport SRL
Fluorescent tubes and other mercury-containing waste	20 01 21*	to	0.130	0.130	Asociația RECOLAMP

## Navrom Shipyard

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Household waste	20 03 01	to	196.13	196.13	Ecosal Gospodărie comunală
Ferrous metals	16 01 17	to	486.45	486.45	Eco-Metal
Absorbents. filter materials (including oil filters without other specification). polishing materials. protective clothing contaminated with dangerous substances	15 02 02*	kg	10	10	
Used tires	16 01 03	To	1.172	1.172	
Materials Plastic/rubber	19 12 04	To	0.21	0.21	
Copper cable	17 04 01	To	0.16	0.16	
aluminum	17 04 02	kg	5	5	
Expired paint	08 01 11*	to	0.320	0.320	
Glass packaging	15 01 07	kg	50	50	RCV Industry SRL
Scrap electrical and electronic equipment. other than those specified in 20 01 21. 20 01 23 and 20 01 35	20 01 36	Buc	99	99	Ingradi
Scrap electrical and electronic equipment. other than those specified in 20 01 21 and 20 01 23 containing dangerous components*6)	20 01 35*	Buc	1	1	
Paper and cardboard packaging	15 01 01	kg	165	165	Ecosal, Sara Transport RCV
Iron filings/chips	12 01 01	to	6.730	6.730	Eco-Metal, MSD COM Buzau
Packaging that contains residues or is contaminated with dangerous substances	15 01 10*	to	1.06	1.06	Eco-Metal, Sara Transport RCV

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Printer toner waste containing hazardous substances	08 03 17*	to	0.01	0.01	Sara Transport RCV
Iron and steel	17 04 05	to	19.298	19.298	Eco-Metal, MSD COM BUZAU
Plastic	15 01 02	kg	384	384	Ecosal, Sara Transport RCV
Bilge oils	13 04 01*	mc	7.4	7.4	Sara Transport RCV
Fluorescent tubes and other mercury-containing waste	20 01 21*	kg	40	40	VASTIM ECO TREND
Absorbents. filter materials. polishing materials and protective clothing. other than those specified in 15 02 02	15 02 03	to	1.23	1.23	Eco-Metal, Sara Transport RCV
Sludge from tanks	05 01 03*	to	0.94	0.94	Sara Transport RCV
Oily waters	13 05 07	to	0.86	0.86	Sara Transport RCV
Non-chlorinated mineral motor oils. transmission and lubrication	13 02 05*	to	0.82	0.82	Sara Transport RCV

## TTS

Waste	Waste code	MU	Generated quantity	Recicled Quantity	Companies authorized for recycling
Mixed municipal waste	20 03 01	to	11.375	11.375	SUPERCOM SA
Paper and cardboard packaging	15 01 01	to	1.355	1.355	
Plastic material packaging	15 01 02	to	0.546	0.546	
Fluorescent tubes and other mercury-containing waste	20 01 21*	kg	8	8	Asociația Ateliere fără Frontiere
Scrapped equipment. ELECTRONIC	16 02 13*	kg	31	31	
Scrapped equipment. other than those specified in 16 02 09 to 16 02 13	16 02 14	to	0.147	0.147	

## 7. Working conditions

### 7.1. Labor relations

Company	No. of employees	Union organization	Collective labor contract
TTS	47	No	No
Navrom	646	No	No
Canopus	10	No	No
TTS Fluvial	153	No	No
TTS Operator	196	No	No
NAVROM Shipyard	267	Navrom Galati naval repairs	CLC No. 155/27.09.2022

In companies where trade unions have not been established, the task of resolving employee notifications and complaints rests with the management of the companies.

All concluded employment contracts provide for the following rights for employees:

- 8-hour working day and 48-hour<sup>6</sup> working week with the legal exceptions in force in accordance with the provisions of the ILO Hours of Work (Industry) Convention, 1919 (No.1) and the ILO Hours of Work (Commerce and Offices) Convention, 1930 (No .30)
- Paid rest leave of at least 21 working days per year
- Paid medical leave

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

Companies have a documented complaint management system procedure.

Annually, company managements analyze and order measures regarding the internal management system of employee notifications and complaints.

Some companies contract workers through staff leasing service providers, under the law. These companies ensure that the suppliers have a good reputation and that the contracted workers have access to the complaints resolution mechanism available to the company's employees.

In 2022, Navrom, TTS Operator and NAVROM Shipyard turned to staff leasing services.

## 7.2. Health and safety at Work

Employees	TTS	NAVROM	TTS OPERATOR	TTS FLUVIAL	NAVROM SHIPYARD	CANOPUS	TOTAL
Total hours of work	82.016	1.167.524	335.053	307.224	512.040	16.500	2.420.357
No. fatal work accidents	0	1	0	0	0	0	1
No. non-fatal work accidents	0	5	0	0	2	0	7
<b>No. work accidents</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>8</b>
No. working days lost due to accidents	0	329	0	107	153	0	589
LTIR <sup>7</sup>	0,0	0,857	0,0	0,0	0,781	0,0	0,578
Fatal accident frequency rate <sup>8</sup>	0,0	0,171	0,0	0,0	0,0	0,0	0,083
TRIR <sup>9</sup>	0,0	1,028	0,0	0,0	0,781	0,0	0,661

Contracted	TTS	NAVROM	TTS OPERATOR	TTS FLUVIAL	NAVROM SHIPYARD	CANOPUS	TOTAL
Total hours of work	0	349.392	88.572	0	74.296	0	512.260
No. fatal work accidents	0	0	0	0	0	0	1
No. non-fatal work accidents	0	0	0	0	0	0	7
<b>No. work accidents</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

<sup>6</sup> The provisions apply to full-time employment contracts. Part-time contracts provide for working times of less than 8h/day, 48h/week

<sup>7</sup> Injury severity rate [working days lost due to accidents / 1,000,000 work hours]

<sup>8</sup> [fatal accidents / 1,000,000 working hours]

<sup>9</sup> Frequency rate of occupational accidents [occupational accidents / 1 million working hours]

Contracted	TTS	NAVROM	TTS OPERATOR	TTS FLUVIAL	NAVROM SHIPYARD	CANOPUS	TOTAL
No. working days lost due to accidents	0	0	0	0	0	0	0
LTIR	N/A	0,0	0,0	N/A	0,0	N/A	0,0
Fatal accident frequency rate	N/A	0,0	0,0	N/A	0,0	N/A	0,0
TRIR	N/A	0,0	0,0	N/A	0,0	N/A	0,0

### 7.3. Occupational health and safety training

	TTS	Navrom	TTS Operator	TTS Fluvial	Canopus	NAVROM Shipyard
Annual OSH training program	x	According to the PO-26 procedure	x	x	The annual training program for employees in the field of OSH	x
OSH training plan	x	Test training program	IIG training planning, periodic ILM	x	x	OSH theme
Proof of training	Individual training sheets	Individual training sheets	OSH training sheets	OSH training sheets	OSH training sheets	Individual training sheets Training minutes for contractors

### 7.4. Fire safety

#### Navrom

Fire Safety Check Activities	Required frequency	Execution dates
Fire drills	Annual	Annual chart
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	Annual	Annual chart
Inspection of portable fire extinguisher, refilling/recharging	Annual	Annual chart

Fire extinguishers 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, which are replaced if necessary. After verification, the respective companies issue quality/warranty certificates for the fire extinguishers in question.

#### Canopus

Fire Safety Check Activities	Required frequency	Execution dates
Fire drills	Annual	12.09.2022
Inspection and certification of electrical and mechanical fire	Quarterly	* PRAM bulletins:

<i>Fire Safety Check Activities</i>	<i>Required frequency</i>	<i>Execution dates</i>
detection and extinguishing systems.		30.05.2022, 28.11.2022 * Revision of the office building fire system 27.01.2022, 10.08.2022 * Revision of the fire system of grain warehouses 12.05.2022, 07.09.2022
Inspection of portable fire extinguisher, refilling/recharging	Annual	Series 1 – Jan. 2022 Series 2 – July 2022 Series 3. – Sept.2022

### NAVROM Shipyard

<i>Fire Safety Check Activities</i>	<i>Required frequency</i>	<i>Execution dates</i>
Fire drills	Annual	Annual chart
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	Annual	* PRAM bulletins: 13.04.2022 * Revision of the office building fire system: 16.12.2022
Inspection of portable fire extinguisher, refilling/recharging	Annual	Series 1 – March. 2022 Series 2 – Sept. 2022

### TTS Operator

<i>Fire Safety Check Activities</i>	<i>Required frequency</i>	<i>Execution dates</i>
Fire drills	Annual	20.05.2022 17.06.2022
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	According to the OHS/PSI/Environment agreement concluded between TTS and Canopus, the responsibility for checking the PSI equipment rests entirely with the owner - Canopus	
Inspection of portable fire extinguisher, refilling/recharging		

### TTS

<i>Fire Safety Check Activities</i>	<i>Required frequency</i>	<i>Execution dates</i>
Fire drills	Annual	21.11.2022
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	Annual	25.06.2022
Inspection of portable fire extinguisher, refilling/recharging	Annual	February 2022

TTS Fluvial

<i>Fire Safety Check Activities</i>	<i>Required frequency</i>	<i>Execution dates</i>
Fire drills	Annual	17.03.2022, 31.03.2022, 12.05.2022, 07.06.2022, 17.06.2022, 16.09.2022, 01.11.2022, 02.11.2022, 04.11.2022, 25.11.2022, 05.12.2022
Inspection and certification of electrical and mechanical fire detection and extinguishing systems.	Annual	PRAM bulletins: 27.01.2022, 25.02.2022, 01.03.2022, 11.03.2022, 10.05.2022, 19.10.2022
Inspection of portable fire extinguisher, refilling/recharging	Annual	05.01.2022, 08.03.2022, 25.03.2022, 12.05.2022, 14.06.2022, 15.06.2022, 01.07.2022, 08.07.2022, 05.08.2022, 22.08.2022, 9.09.2022, 28.09.2022, 10.10.2022, 11.10.2022, 04.11.2022



## 7.5. Work accidents

### Navrom

Type of accident	Date	Description of the accident	Documents sent to the authorities	Documents received from the authorities	Measures taken
Temporary work disability	08.01. 2022	At around 12.30, during the maneuver to reposition and equalize in convoy the barges ANR 798ex20034 and ANR 1292ex20040, by restoring the links (made of metal ropes) between the barges, the sailor B.E.C., misjudging the level of slackening of the rope and the tendency to stretch, grabbed with the right hand, the rope's eye in close proximity to the point of contact with the bit, on the inside of the eye, at which point the rope extended, the bit pressing the hand over the collar of the bit, catching the palm of his right hand in that area. As the grip was superficial, the moment he felt the pain, the sailor immediately withdrew his hand from the point of grip, the glove being caught between the line and the batten	Investigation report + FIAM	Notice to the Investigation report and FIAM	- Report processing; - risk reassessment; - PPP update
Temporary work disability	13.03. 2022	At around 08.30, P. R. F., a sailor on the ship POIENARI 1, participating in the transfer of materials for repairs from the ship Poienari 1 to the barge ANR 560 / Ex 30061, in the harbor of the Galati river port, caught the pants of his overalls in a tambuchi cap fastening element in the bow area of the ship POIENARI 1, became unbalanced and fell on the deck. Later, alleging a trauma to the ankle of the left leg, he presented himself at the Emergency Department of the Galati County Emergency Hospital, where he was admitted for investigations and specialized medical treatment, undergoing surgery with the diagnosis of "Bimalleolar Ankle Foot Fracture Left".	Investigation report + FIAM + FIAM annex	Notice to the Investigation report and FIAM + FIAM annex	- Report processing; - risk reassessment; - PPP update
Temporary work disability	17.06. 2022	Around 2:00 p.m., during the convoy reconfiguration maneuver of pusher MERCUR 206, sailor C. I. caught the fingers of his left hand with his glove between the gauntlet and the stern of a barge. Later, after he was transported to the Galati County Hospital, the diagnosis of "trauma on fingers 3 and 4 of the left hand" was established, and he underwent surgery.	Investigation report + FIAM + FIAM annex	Notice to the Investigation report and FIAM + FIAM annex	- Report processing; - risk reassessment; - PPP update
Minor accident	29.07.2022	At around 22.00, T. S., a sailor on pusher MERCUR 203, participating in the convoy reconfiguration maneuver in the Călărași-Danube port area Km 408, hit the fingers of his left hand while handling the tying rope in the starboard stern area of the barge ANR 1080. Initially the sailor thought it was something superficial and continued his work on board under normal conditions. Since the next day there were signs of injury in the area of the tips of the II and V fingers of the left hand, the sailor was disembarked and transported to the Galati County Hospital, where the diagnosis was established "Left hand contusion II and IV fingers". The sailor	Investigation report	Notice to the Investigation report	- Report processing; - risk reassessment; - PPP update

Type of accident	Date	Description of the accident	Documents sent to the authorities	Documents received from the authorities	Measures taken
		<i>was given permission to leave the medical facility.</i>			
Temporary work disability	19.08.2022	<i>At around 7:20 p.m., while operating the starboard bow mooring winch from ANR barge 893 of the MERCUR 307 convoy, at anchor in the port area of Izmail/Ukraine – Danube-Braț Chilia Km 91, river helmsman C. V. was injured on the right hand, in the area of the V finger, where it was struck by the manual winch steering wheel. Initially, the helmsman was transported to the Izmail Hospital, where he received emergency medical assistance, and then he received specialized medical assistance at the Galați County Hospital, where he received the diagnosis "Contusion wound of the right hand, metatarsal V base fracture" and was plaster cast and splint applied.</i>	<i>Investigation report + FIAM + FIAM annex</i>	<i>Notice to the Investigation report and FIAM + FIAM annex</i>	<i>- Report processing; - risk reassessment; - PPP update</i>
Death	23.10.2022	<i>At around 06.30, sailor R. C. from the crew of the tug-pusher "Tg. Ocna 6", located in the port of Constanța, while the ship was mooring to the ANR barge "770" (ex 30095), wanting to transfer the metal tying line from the thruster to the barge, he lost his balance and fell into the water. He was recovered by the crew, he was given first aid, but later the sailor died. The 112 emergency service was requested. The crew on the special vehicle confirmed the death.</i>	<i>Documents requested by ITM Constanta for case investigation</i>	<i>Requests for documents and clarifications on documents</i>	<i>- Processed the case with the navigation staff</i>
Temporary work disability	05.12.2022	<i>At around 11:30, sailor T. A. V, from the crew of pusher "Mercur 206", during the mooring maneuver at the ANR barge "750" in the area of river km 523+700 on the Danube (upstream of Giurgiu), injured the fingers of his left hand, during the operation of the tie-down winch in the center aft area of the ship. Afterwards, "Mercur 206" moved to the port of Giurgiu, from where an ambulance with a medical crew picked up the sailor and transported him to the Giurgiu County Emergency Hospital. The sailor was transferred to the Emergency Clinical Hospital "Bagdasar-Arseni" in Bucharest, where he was hospitalized and underwent surgery.</i>	<i>Investigation report + FIAM</i>	<i>Notice to the Research File and FIAM</i>	<i>- Report processing; - risk reassessment; - PPP update</i>

## Navrom Shipyard

Type of accident	Date	Description of the accident	Documents sent to the authorities	Documents received from the authorities	Measures taken
Temporary work disability	06.05.2022	<i>Locksmith N. G., at the beginning of the program at 07.20, was hit by the leg of the Tb crane of Dock 595 which was moving</i>	<i>Investigation report + FIAM + FIAM annex</i>	<i>Medical decision</i>	<i>- Report processing; - risk reassessment; - PPP update - retraining employees with OSH instructions for ship repair</i>
Temporary work disability	20.09.2022	<i>Locksmith V. M. was scared by the falling of a sheet of the bottom of the barge 20022 and</i>	<i>Investigation report + FIAM + FIAM</i>	<i>Medical decision</i>	<i>- Report processing; - risk reassessment;</i>

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<i>Type of accident</i>	<i>Date</i>	<i>Description of the accident</i>	<i>Documents sent to the authorities</i>	<i>Documents received from the authorities</i>	<i>Measures taken</i>
		<i>avoiding the dock deck fell on the same level on the dock deck, hitting his head.</i>	<i>annex</i>		

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## 8. Environmental protection

### 8.1. Environmental Permits and Reporting Obligations

#### TTS Fluvial

##### Workpoint Bechet

Environmental authorization issued by APM Dolj no. 98/14.06.2021

- Waste statistics. Questionnaire 4: PRODDDES, annually, upon request;
- Waste management reporting, annually, until March 31, for the previous year;
- Air, soil analysis bulletin - at the request of the environmental authority;
- Required data of APM Dolj and CJ Dolj of GNM - upon request

##### Workpoint Brăila

Environmental authorization issued by APM Brăila no. 44/26.03.2013 (last revision 05.03.2021)

- Waste management reporting, annually, until March 31, for the previous year;

##### Workpoint Drobeta Turnu Severin

Environmental authorization issued by APM Mehedinți no. 1/05.01.2021

Data that will be reported to the authority for environmental protection and periodicity:

- Emission limit values for noxes from the thermal power plant - annually;
- Statistical survey regarding waste management, questionnaire type GD - PRODDDES;
- Reporting centralized data on waste management - annually;
- Quantities of used oil: semiannually;
- Other reports, requested by the CFM Office, as the case may be

##### Workpoint Oltenița

*PL Oltenița submitted the necessary documents for the issuance of the environmental permit*

##### Workpoints Giurgiu și Galați

*The activity in PL Giurgiu does NOT require environmental authorization*

#### Canopus

AUTORIZATIE DE MEDIU Nr. 84/25.03.2020

WATER MANAGEMENT AUTHORIZATION No. 66/05.05.2022

- Bulletin reporting analysis of purified water discharged into the port basin - quarterly
- Waste management reporting (H.G. NO. 856/2002), annually, until March 31, for the previous year;
- Noise level determination - at the request of the environmental authority
- AIR MONITORING IS NOT A REQUIREMENT IMPOSED BY THE ENVIRONMENTAL AUTHORIZATION
- Monitoring of sedimentable and airborne dusts, quarterly.

#### NAVROM Shipyard

##### Workpoint Galați

ENVIRONMENTAL AUTHORIZATION No. 229/28.12.2022

- Noise level reporting at the limit of the functional areas, at the peak hour of the activities carried out - annually
- Waste management reporting according to H.G. no. 856/2002 – quarterly
- Management plan for organic solvents containing organic compounds - annually
- Clear reporting of freshly used oil and the generated used oil - semi-annually and at the request of A.P.M. Galati
- Statistical survey on waste management, questionnaire type GD - PRODDDES - annually and at the request of A.P.M. Galati
- Reporting of evidence of substances and chemical preparations used by types and quantities - annually, until January 31 for the previous year
- Immediate reporting of any event that could have an impact on environmental factors

#### Workpoint Cernavodă

ENVIRONMENTAL AUTHORIZATION No. 197/26.06.2013

WATER MANAGEMENT AUTHORIZATION No. 4/07/01/2022

- Bulletin reporting analysis of total suspended powders and sedimentable powders - semiannually
- Centralizer of analysis bulletins of drained wastewater - annually
- Determination of noise level - at the request of APM Constanta
- Waste management reporting (H.G. NO. 856/2002), annually, until March 31, for the previous year;
- Reporting the quantities of chemical products used - annually

#### NAVROM

#### Workpoint Drobeta Turnu Severin - Restaurant „Vraja Dunării”

ENVIRONMENTAL AUTHORIZATION No. 125/14.09.2012, Revised on 14.10.2021

WATER MANAGEMENT AUTHORIZATION No. 109/12.09.2022

- Waste statistical reporting: GD PRODES - annually, until March 15, the data corresponding to the previous year
- Waste management reporting in written format - annually, until March 15, the data corresponding to the previous year
- Reporting the quantities of dangerous chemical substances and preparations managed - annually, until January 31, the data corresponding to the previous year
- Waste water monitoring report - semiannually to S.G.A. MEHEDINȚI
- Other reports at the request of the C.F.M. Office. from A.P.M. MEHEDINȚI

#### Workpoint Drobeta Turnu Severin – Passenger port at river km 937 (Mehedinți SHIP)

ENVIRONMENTAL AUTHORIZATION No. 58/18.12.2015, Revised on 17.12.2020

- Waste management reporting (H.G. NO. 856/2002), annually, until March 31, for the previous year;
- Waste statistical reporting: GD PRODES - annually, until March 31, for the previous year
- Drinking water monitoring - annually

#### Constanța branch

ENVIRONMENTAL AUTHORIZATION No. 123/18.08.2022

- 
- Presentation of analysis bulletins for Ph, suspended matter and biodegradable detergents - at the request of the environmental authority
  - Waste management reporting in written and electronic format, according to OUG no. 92/2021 - annually, until March 15, the data corresponding to the previous year
  - Waste management reporting in S.I.M. - at the request of the environmental authority
  - Presentation of noise level determination bulletins - at the request of the environmental authority
  - Reporting the amount of used oil, until April 30 of the year following the one for which it is reported
  - Presentation of analysis bulletins for waste water discharged into the sewer network - at the request of the environmental authority
  - Any accidental pollution will be reported immediately to the environmental authority

### Galati branch

- Waste management reporting in written and electronic format, according to GEO no. 92/2021 - annually, until March 31, the data corresponding to the previous year
- Reporting the management of fresh and used oil generated, in accordance with H.G. no. 235/2007 - quarterly and at the request of APM Galati (within the term mentioned in the request)
- Reporting of evidence of dangerous substances and preparations used - annually at APM Galati until January 31 of each year, for the previous year
- Immediate reporting to APM Galati and G.N.M. - C.J. Galati of any event that could have an impact on environmental factors
- Reporting any exceedances of the allowed limit values to the quality indicators of the pollutants allowed to be discharged into the environment
- Immediate reporting to APM Galati and GNM - CJ Galati in case of an event (regardless of the affected environmental factor - water, air, soil) that can occur in ecological accidents/incidents, accidental pollution and the transmission of the Information Report in case of pollution accidental, according to the Annexes displayed on the website of APM Galati - information of public interest section, within 2 hours at most from the occurrence of the event
- Other data at the request of the environmental authority

## 8.2. Monitoring and Compliance

Company	Monitoring program	Waste reporting	Compliance (parameter monitoring)				Degree of achievement
			Air	Soil	Noise	Water	
TTS - Bechet	A.M. Nr. 98/14.06.2021	ANNUAL	ON REQUEST	ON REQUEST	-	-	Yes
TTS - Giurgiu	-	ANNUAL	-	-	-	-	Yes
TTS - Oltenița	-	ANNUAL	-	-	-	-	Yes
TTS Fluvial - Galați	-	ANNUAL	-	-	-	-	Yes
TTS Fluvial - Brăila	A.M. Nr. 44/26.03.2013	ANNUAL	-	-	-	-	Yes
TTS Fluvial – Tr. Severin	A.M. Nr. 1/05.01.2021	ANNUAL	Report of verifications, trials and samples No. 11/20.01.2022	-	-	-	Yes
Canopus	A.M. Nr. 84/25.03.2020	MONTHLY	Reports on the analysis of dust in the air: 424/25.11.2022, 230/18.07.2022, 19/22.03.2022	ON REQUEST	-	Waste water analysis reports 3039/11.12.2022, 2324/10.09.2022, 1248/07.06.2022, 547/22.03.2022	Yes
TTS Operator	-	ANNUAL	-	-	-	-	Yes
NAVROM	A.M. Nr. 173/29.10.2019	ANNUAL	-	-	-	-	Yes
NAVROM Drobeta Tr. Severin - Nava Mehedinți	A.M. Nr. 58/18.12.2015 Rev. 2020	ANNUAL	-	-	-	Test report (drinking water from onboard tanks) no. 1226 / 04.11.2022	Yes
NAVROM Drobeta Tr. Severin Restaurant „Vraja Dunării”	A.M. Nr. 125/14.09.2012 Rev. 2021	ANNUAL	-	-	-	Waste water analysis reports nr.392 / 16.08.2022	Yes
NAVROM Sucursala Constanța	A.M. Nr. 123/18.08.2022	ANNUAL	-	-	ON REQUEST	ON REQUEST	Yes
NAVROM SHIPYARD - Galați	A.M. Nr. 229/19.12.2012 REV. 2015	QUARTERLY	C.O.V. Report Nr. 6241/09.03.2022	-	Sonometric analysis bulletin nr.4083/18.07.2022	-	Yes
NAVROM SHIPYARD - Cernavodă	A.M. Nr.197/26.06.2013	ANNUAL	Test reports: 3814/ 28.06.2022 (Sedimentable powders), 813/28.06.2022 (Suspended powders)	Centralization report of used chemical products 505/ 29.06.2022	LA SOLICITARE	Testing reports 11/16.02.2022, 43/16.05.2022 82/05.09.2022, 113/28.11.2022	Yes

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## Note

<sup>1</sup> Regarding liquid fuel consumption, energy intensity and CO2 unit emissions, the EHS Report is focused on the NAVROM fleet, the largest consumer in the reporting area. For this reason, the report presents statistics starting from 2014, thus allowing the appreciation of NAVROM's evolution over a period of 7 years.

Fleet efficiency indicators are presented in two versions:

- Related to the physical distance traveled [thousand tons\*km]
- Related to the work performed [kilats]

The work done by a propelled ship is a quantity derived from the physical course which, in addition to the distances traveled and the quantities of cargo transported, takes into account the mass of the pusher and the barges that make up the convoy as well as the navigation conditions, namely:

- direction of travel: upstream or downstream,
- the degree of difficulty of navigation on each stretch of water that the convoy crosses

For clarity, the statistics also include the values of the physical routes performed and the work performed by the NAVROM fleet in each of the monitored periods.