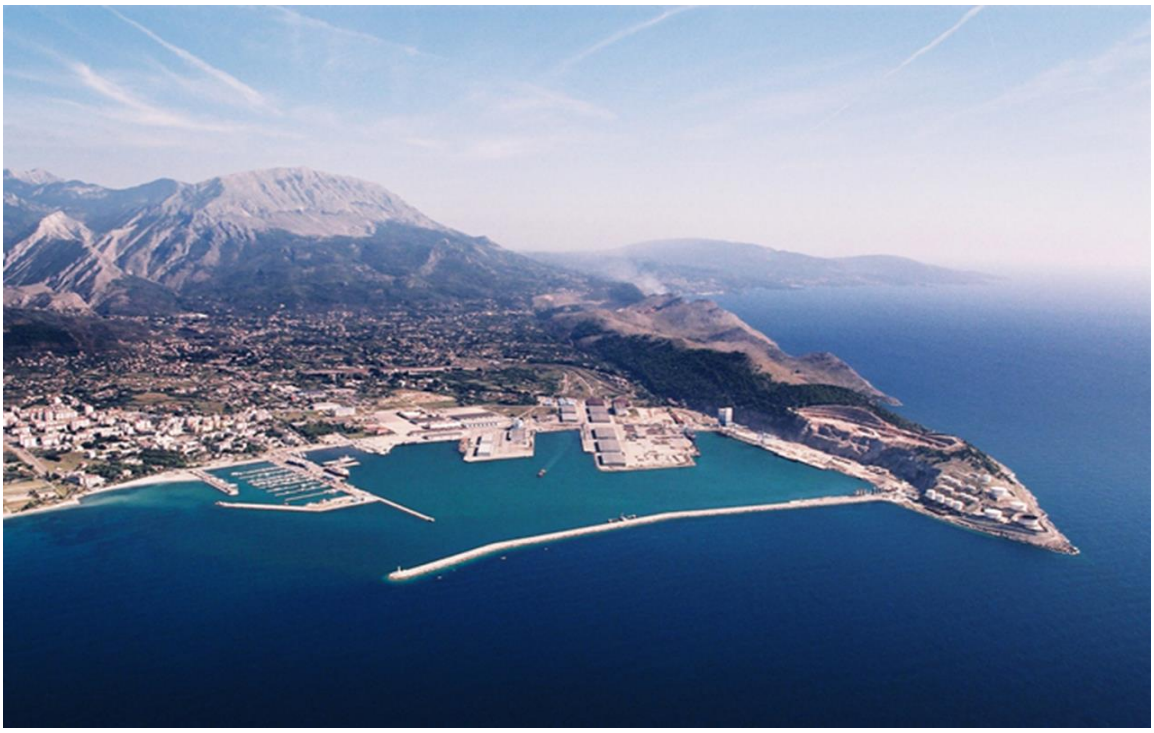
PORT ENVIRONMENTAL REVIEW SYSTEM (PERS)

PORT OF ADRIA JSC BAR



PORT OF ADRIA

June, 2019

Contents

1. INTRODUCTION

1.1 About the PERS

The Port Environmental Review System (PERS) is an initiative for the Eco Ports certification of ports belonging to the European Sea Ports Organization (ESPO). The PERS methodology is one of the tools of ESPO to demonstrate that the port meets various requirements relating to environmental protection and sustainable development.

The PERS certificate is valid for a period two years. At the end of this period, the sustainability and environmental protection of the port is reviewed anew. Port of Adria JSC Bar has decided to cooperate with ECOSLC in October, 2018.

The main environmental objectives in Environmental Code of Practice (2004) which ESPO should aim to achieve are:

- To contribute to the development of a sustainable logistics chain.
- To encourage wide consultation, dialogue and cooperation between port administrations and the relevant stakeholders at local level (port users, public, NGOs)
- To generate new knowledge and technology and to develop sustainable techniques which combine environmental effectiveness and cost efficiency.
- To enhance cooperation between port administrations in the field of environment and facilitate the exchange of experiences and implementation of best practices on environmental issues to avoid unnecessary duplication and enable port administrations to share the costs of environmental solutions.
- To increase awareness of environmental concerns and to integrate sustainable development into ports' policies, by encouraging port administrations to prepare a publicly available environmental policy setting out their strategies and methods of achieving them.
- To encourage port administrations to conduct appropriate environmental impact assessments for port projects and appropriate strategic environmental impact assessments for port development plans to assess, at an early stage.
- To stimulate continual improvement in the port environment and its port environmental management by promoting the use of Environmental Management Information System tools.
- To promote monitoring, based on environmental performance indicators, in order to measure objectively identifiable progress in environmental port practices.
- To promote environmental reporting as a means of communicating environmentally good behaviour to stakeholders.
- To intensify the communication about environmental improvements achieved by ports.

1.2 Port of Adria JSC Bar

1.2.1 General Information

Port of Adria JSC Bar was established by a decision on restructuring, by separation and establishment of a new company, reached by the extraordinary Shareholders' Assembly of Port of Bar JSC.

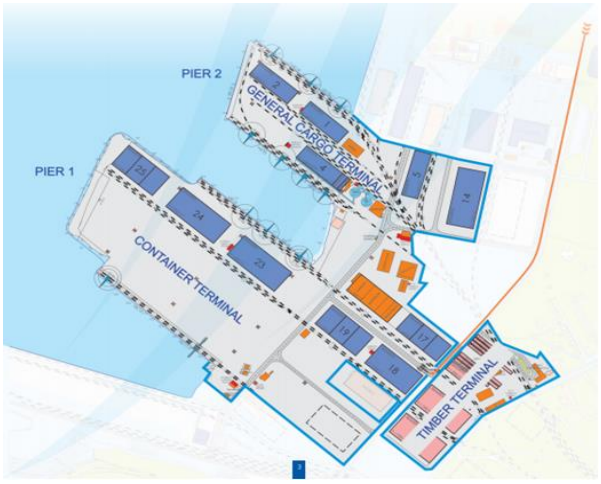
Bar is located in the south-eastern part of Montenegro, between the Adriatic Sea and Skadar Lake, with a favourable geographic position, being situated on the southernmost part of the Adriatic Sea with gravitating hinterland of continental Montenegro, Serbia, Macedonia as well as the Middle, Southeast and Eastern Europe , southern Italy, northern and northwestern Albania. The town of Bar is located at 42 ° 6 'latitude and 19 ° 6' longitude, at an altitude of 4 meters and has over 270 sunny days which makes it one of the sunniest cities in Europe.

Port of Adria, occupies 518,980 m² of the port area. It includes the Container Terminal (Pier I), the Terminal for General Cargo (Pier II), Timber Terminal, the Ro-Ro Terminal, the closed and open storage space.

Port of Adria has an operational quay of 1.440 meters long. There is a possibility to berth various types of ships on all nine berths at the same time as per international practices.

Port of Adria represents an important link in the intermodal transport chain in the region due to its integration with Bar-Belgrade railways and road transport network and an opportunity for establishing distribution centres for a range of product groups. Complete area of Port of Adria is under Free Zone regime and provides benefits in terms of exemption from customs duties, taxes and other duties.

The main business activity of Port of Adria JSC is cargo handling. In addition, the Company also carries out the following activities: storing, work of storages and warehouses for all types of cargo and cruise business.



OPERATIONAL QUAY	BERTHS	DRAFT (m)	LENGTH (m)
Pier 1, south quay	1.1	11,5	165
Pier 1, south quay	1.2	11,5	165
Pier 1, north quay	1.3	11,0	165
Pier 1, north quay	1.4	11,0	165
Pier 2, south quay	2.1	11,0	155
Pier 2, south quay	2.2	11,0	155
Pier 2, west quay	2.3	10,5	190
Pier 2, north quay	2.4	11,0	140
Pier 2, north quay	2.5	10,5	140

Figure 1: Port of Adria JSC Bar

1.2.2 Technical Information

Port Area: 518.980 m²

Container Terminal: 80.000 m²

General Cargo Terminal 127.982 m²

Timber Terminal: 5.800 m²

Ro Ro Terminal: 52.400 m²

Number of berths: 9

Reefer Station: 7000m²

Closed warehouses: 12 warehouses of total area 76.732 m²

Open storage space: 163.390 m²

Main Administration Building: 1200m²

Port equipment is as follows:

Cranes: 2 Portal crane Ganz– 5t, 2 Portal crane Ceretti e Tanfani – 8t, 2 Portal crane Ganz– 20t, 1 Container Crane Ceretti e Tanfani 40t, 1 Container Crane Liebherr 40/60/88 t

Mobile port cranes: 1 Mobile port crane Gottwald – 40/80 t, 2 Mobile port crane RHL 880D Terex Fuchs

Automobile cranes: 1 automobile crane – 12t

Towing vehicles: 4 tractors IMT, 2 trucks, 3 trucks MAFI, 1x truck SISU, 1 loco tractor IMT

Trailers: 28 trailers – 8t, 1 trailer – 50t, 3 trailers – 60t, 4 trailers – 65t, 1 trailers for MAN

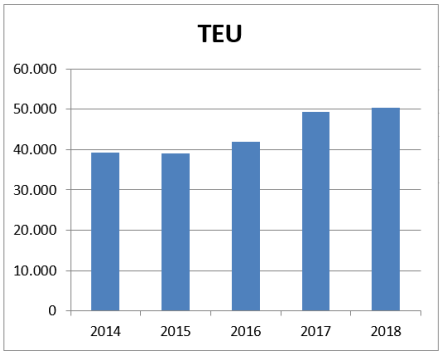
Forklifts: 3 diesel forklift – 2t, 16 diesel forklift – 3t, 3 diesel forklift – 6t, 2 diesel forklift – 6,5t, diesel forklift – 12,5t, 1 diesel forklift – 13t, 2 diesel forklift – 25t, 2 diesel forklift – 42t, 2 reach stacker – 45t, 3 electric forklift – 1,5t, 3 electric forklift – 3t

Loaders: 1 loader Radoje Dakić, 1 loader Hyundai HL757-9A, 1 compact loader Bobcat S650

1.2.3 Statistics

The number of cargo and cruise ships / ferries and passengers statistics which call to the Port of Adria between 2014 and 2018 is given in the tables below.

Container cargo		
Year	TEU	Vessels
2014	39.186	149
2015	39.050	156
2016	41.828	167
2017	49.282	123
2018	50.444	148



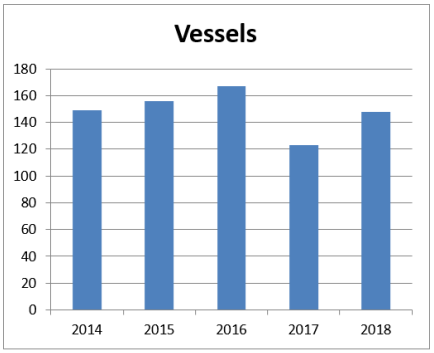
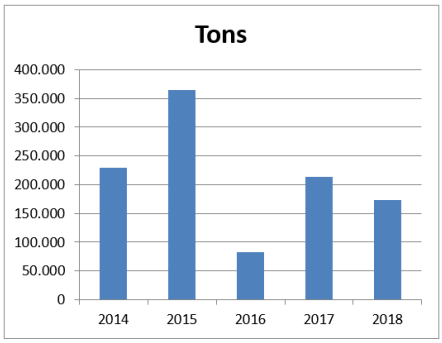


Table 1: Container vessels and TEUs statistics by year

General cargo		
Year	Tons	Vessels
2014	229.069	109
2015	365.267	123
2016	82.184	51
2017	213.207	74
2018	173.212	54



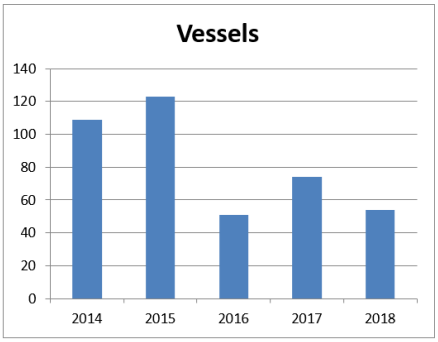
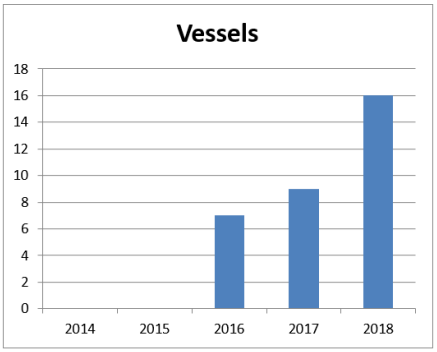


Table 2: General cargo vessels and tons statistics by years

Cruise		
Year	Vessels	Passengers
2014	0	0
2015	0	0
2016	7	8.660
2017	9	10.774
2018	16	22.473



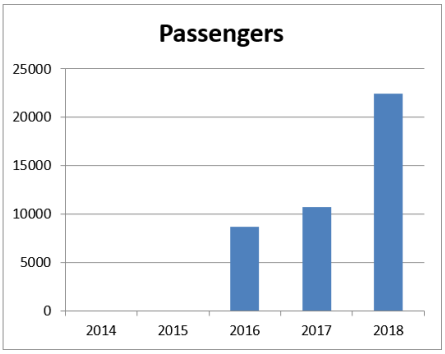


Table 3: Cruise ships and passengers statistics by years

2. POLICY STATEMENT

2.1 Environmental Policy

2.1.1 Introduction and Purpose

Business strategy and vision of Port of Adria JSC Bar is based on Integrated Management System (IMS) as a powerful tool for business improvement and successful management of business processes.

The Integrated Management System (IMS) integrates: quality management system (QMS 9001: 2015), environmental management system (EMS 14001: 2015) and occupational health and safety management (OHSAS 18 001: 2007).

Management of the Port of Adria Company complies with and commits to the principles of environmental management policy that are integrated in Port of Adria JSC Bar IMS policy:

IMS POLICY STATEMENT

IMS Policy of Port of Adria JSC Bar is focused on gaining and strengthening of trust of service users and other interested parties by fulfilling their requests, needs and expectations, through

- Establishment and continuous improvement of Integrated Management System – IMS: ISO 9001:2015 (QMS), ISO 14001:2015 (EMS) and OHSAS 18001:2007,
- Continuous improvement of business processes in accordance with standard requirements, expectations of users and increasing port service users satisfaction level,
- Engagement of all employees in the realization of processes and constant upgrading of their know-how, expertise and motivation,
- Planning of securing high professional staff and constant upgrading of employees for IMS,
- Integration with the processes of active management of transport and port trends, connecting with world maritime goods flow and international maritime institutions,
- Creating new tariff principles with the application of cost management system, liquidity management and achieving targeted profitability,
- Benchmarking with the best in port transport business with continuous improvement of overall Company performance,
- Commitment to prevention of injuries and health endangerment as well as commitment to continuous improvement of OH&S performances and OH&S management system,
- Commitment to compliance with legislation, international business norms and achieving business objectives by complying with ethical and legal principles as well as IMS standards requirements,
- Commitment to the environment through improving performances, waste management, rational use of resources and constant re-examining of context, risk and environmental aspects,
- Upgrading working conditions and modernization of equipment,
- Raising employees' awareness of the importance of responsible attitude towards resources, confidential information and business risks.

2.1.2 Scope

The scope of application of integrated management system refers to port and transport services, requests of stakeholders and external and internal factors.

The physical area of application is: works execution, warehouses, administrative and auxiliary facilities and supporting infrastructure and information systems.

2.1.3 Responsibilities

Responsibilities are precisely defined with IMS procedures and instructions.

2.1.4 Monitoring, Audit and Improvement Process

The Policy is regularly reviewed by the company management while the practices are continuously monitored, and relevant assessments are reported annually. The Policy was adopted by the CEO resolution on June 2018.b Internal and external audits are conducted every year.

2.2 Mission and Values

2.2.1 Mission

Port of Adria – dedicated to providing high-quality, reliable and fast services at all times to all; focused on development and application of highest international business standards and efficient and effective technology; oriented to sustainable growth and value creation for all stakeholders; recognized for its values and growing trust and loyalty of its partners; distinguished for its proactive approach to create exciting and dynamic work place environment blending experience and aspiration, leadership and teamwork.

2.2.2 Values

Accountability

- ✓ We take ownership and responsibility for our actions
- ✓ We are trustworthy and invest maximum efforts in fulfilling promises
- ✓ We set high standards in performance

Team work

- ✓ We create teams who share and have a strong relationship
- ✓ Best solutions result from working together, among colleagues and throughout cooperation with partners.

Quality

- ✓ We strive to upgrade quality in everything we do.
- ✓ We constantly develop and widen our know-how and competences.
- ✓ We build on trust by providing our best every time

Continuous Development

- ✓ We constantly invest time and efforts in adapting to changing conditions and trends
- ✓ We develop internally by sharing know-how and expertise

Smart Investment and Productivity

- ✓ We create value through dedication to our plans for the future
- ✓ We strive to achieve maximum results with optimum resources

Strong Communication

- ✓ We communicate intensively internally in order to provide timely and accurate information
- ✓ We opt for open, two-way, constructive, supportive communication

Caring and active member of community

- ✓ We monitor the needs of our immediate community
- ✓ We support and contribute to motivating young people to excel and grow professionally

3. ENVIRONMENTAL ASPECTS AND LEGAL REQUIREMENTS

The Port's environmental aspects and risks are mainly focused around natural resource, water and energy consumption, emissions, air and water pollution, natural disasters, handling of hazardous waste and effluents, and impacts on environment due to noise and vibration. The Company responds to these aspects and risks in a systematic and proactive manner in line with its environmental management system.

To foster environmental sustainability, the port manages environmental matters in line with laws and regulations where the port operates, international environmental standards and the port's Environmental Policy. The Board supervises determining and operating notifications, examinations, and enforcement mechanisms for non-compliance with rules and regulations regarding the Environmental Policy.

Environmental aspect is an element of the port's activities or services that interacts or can interact with the environment.
In accordance with the requirements of the Standards ISO 14001:2015, the Company has established a procedure for identifying environmental aspects (IP.14 Identification and evaluation of environmental aspects) that occur as a result of its activities and services, which the organization can control or are expected to have influences to determine aspects that have or may have a significant impact on the environment.
Evaluation of the significance of the aspects is determined by the defined criteria in accordance with the requirements of the standard and the legal regulations.
Significant aspects have priority when setting environmental protection objectives and creating programs for their fulfillment.

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
1	Handling operation/ warehouse – container/ there are no filters – separator for heavy metals separation	Lead concentrate goes directly to atmospheric sewage – sea - due to its spills	Discharge into sea	Operations Dept.	Law on environment Law on waste management Law on chemicals Law on waters Law on hazardous substances transport Law on ports	Rulebook on quality and sanitary and technical conditions on waste waters discharge in the recipient and sewage and the manner and procedure of waste waters quality survey, minimum number of surveys and the content of the report on determined waste waters quality	Measuring of quantity of exhausting substances into air, water and separator/ filter for heavy metals separation installation
						Rulebook on more detailed content of records on training employees in relation to dangerous substances transport and years report on application of safety measures in hazardous substances transport	
						Rulebook on the content of safety sheet for chemicals	
						Rulebook on manner of records keeping and the content of form about waste transport	

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
2	Equipment washing - there is no heavy metals separator	Equipment washing products (lead concentrate) goes to atmospheric sewage - sea	Discharge into water	Operations Dept.- Technical division	Law on environment Law on waste management Law on chemicals Law on waters Law on hazardous substances transport	Rulebook on quality and sanitary and technical conditions on waste waters discharge in the recipient and sewage and the manner and procedure of waste waters quality survey, minimum number of surveys and the content of the report on determined waste waters quality	Separator/ filter for heavy metals separation installation
						Rulebook on more detailed content of records on training employees in relation to dangerous substances transport and years report on application of safety measures in hazardous substances transport	
						Rulebook on the content of safety sheet for chemicals	
						Rulebook on manner of records keeping and the content of form on waste transport	

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
3	Old project design	Discharge of atmospheric sewage in port basin by the surrounding	Discharge into water	Operations Dept.- Technical division	Law on environment Law on waste management Law on chemicals Law on waters Law on hazardous substances transport	Rulebook on quality and sanitary and technical conditions on waste waters discharge in the recipient and sewage and the manner and procedure of waste waters quality survey, minimum number of surveys and the content of the report on determined waste waters quality	New project design
						Rulebook on more detailed content of records on training employees in relation to dangerous substances transport and years report on application of safety measures in hazardous substances transport	
						Rulebook on the content of safety sheet for chemicals	
						Rulebook on manner of records keeping and the content of form on waste transport	

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
4	Work process	Vapours and dust emission at the time of cleaning bulk lead concentrate with bob cat	Air emissions	Operations Department	Law on environment Law on waste management Law on chemicals Law on air protection Law on hazardous substances transport	Rulebook on business activities that affect and can affect air quality	Compliance with the prescribed work technologies
						Rulebook on determination of pollutant substances, limiting values and other quality standards	
						Rulebook on establishing the network of measuring instruments for monitoring air quality	
						Rulebook on the content and the manner of yearly information on air quality	

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
5	There is no device for purification – local problem	Fecal sewage discharge in the sea	Discharge into water	Bar Municipality	Law on environment Law on waters	Rulebook on quality and sanitary and technical conditions on waste waters discharge in the recipient and sewage and the manner and procedure of waste waters quality survey, minimum number of surveys and the content of the report on determined waste waters quality	Collector Installation
6	Clogged/ broken manholes	Soil pollution from flooded (uncleaned) broken manholes	Soil pollution	Operations – Technical Dept.	Law on environment Law on waste management Law on chemicals Law on hazardous substances transport	Rulebook on allowed quantities of dangerous and hazardous substances and methods for their examination	Manholes replacement and cleaning
7	Work process	Soil contamination due to spreading of lead concentrate	Soil pollution	Operations Department	Law on environment Law on waste management Law on chemicals Law on hazardous substances transport	Rulebook on allowed quantities of dangerous and hazardous substances and methods for their examination	Compliance with the prescribed work technologies

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
8	Work process	Lead concentrate dust emission at the time of simultaneous removal of tarpaulin from trucks, due to large number of trucks in front of warehouse	Air emissions	Operations Department	Law on environment Law on waste management Law on chemicals Law on hazardous substances transport	Rulebook on activities that affect or can affect air quality. Rulebook on determination of polluting substances, limiting values, and other quality standards Rulebook on establishing the network of measuring instruments for monitoring air quality Rulebook on the content and the manner of yearly information on air quality	Compliance with prescribed work technologies
9	Accident – operation with high voltage power switch or at the time of oil replacement	Gas emission from the switch and occurrence of dangerous and explosive mixture	Air emissions	Operations – Technical division	Law on environment Law on chemicals Law on air protection	Rulebook on business activities that affect and can affect air quality Rulebook on determination of polluting substances, limiting values, and other quality standards Rulebook on establishing the network of measuring instruments for monitoring air quality Rulebook on the content and the manner of yearly information on air quality	Compliance with the instructions for extraordinary situations

	2		3	4	5	6	7
No.	Activity	Aspect	Effect	Department	Legal regulations	By-laws	Control measures
10	Accident – cancellation of relay protection, the temperature of cooling device	Emissions due to ignition of piracy and transformer oil of transformers	Air emissions	Operations – Technical division	Law on environment Law on chemicals Law on air protection	Rulebook on business activities that affect and can affect air quality	Compliance with the instructions for extraordinary situations
						Rulebook on determination of polluting substances, limiting values, and other quality standards	
						Rulebook on establishing the network of measuring instruments for monitoring air quality	
						Rulebook on the content and the manner of yearly information on air quality	

Number	Activity/Location	All environmental aspects	Impact	Assessment
1	Handing operation/ storage - container/ there are no filters - heavy metals separator	Lead concentrate - due to spillage, it goes directly to the atmospheric sewage - sea	Leakage into water	1125
2	Equipment washing - there is no heavy metals separator	Equipment washing products (lead concentrate) goes to atmospheric sewage - sea	Leakage into water	1125
3	Old project design	Leakage of atmospheric sewage to the port basin from the surrounding	Leakage into water	1125
4	Work process	Steam and dust emissions - while cleaning the bulk lead concentrate with bob cat	Emission into air	750
5	There is no purifying device - local community problem	Leakage of fecal sewage into the sea	Leakage into water	625
6	Clogged/ broken manholes	Soil pollution from the flooded manholes (not cleaned /broken manholes)	Soil pollution	625
7	Work process	Soil contamination due to the spreading of lead concentrate	Soil pollution	450
8	Work process	Dust from lead concentrate emissions at the time of simultaneous tarpulines taking away from the trucks, due to large number of trucks in from of the warehouse	Emission into air	450
9	Accident - the failure of relay protection, cooling device temperture	Emissions due to ignition of piralen andtranformer station oil	Emission into air	450
10	Accident - handling with the high voltage switch or at the time of oil change	Gasses emissions from the switch and creation of dangerous explosive and flammable mixture	Emission into air	450
11	Large number of trucks simultaneously	Emissions from the means of transport	Emission into air	375
12	Washing products go to atmospheric sewage	Oil, lubricants anddetergent presence in the water	Leakage into water	300
13	The facility is not functional – there is compulsory ventilation	Steam emission from the service workshop, motor workshop in BOSH facility at the high temperatures	Emisije u vazduh	300
14	Oil change in trafos and oily cables	Evaporation of oily steams into the air at the time of heating il for trafos and cables	Emission into air	250
15	There is no ventilation in the workshop	Emissions from means of transport in the workshop	Emission into air	225
16	Aged transport vehicles	Emissions from transport vehicles	Emission into air	180

17	Wrong formation of working area	Cargo dropping into the water	Leakage into water	180
18	Disposal in te temporary waste storage	Soil contamination with bitulite, polyasbetol etc. .	Soil pollution	150
19	Disposal in te temporary waste storage	Glass wool particles emission, from salonite board	Emission into air	150
20	Inadequate speed or missing signals	Leakage due to wagon's popping out from the track	Soil pollution	150
21	There is no compulsory ventilation	Steam from the battery emission in the old batteries in the old workshop	Emission into air	150
22	Workshop washing	Presence of oils, dust etc. Remains in atmospheric sewage	Leakage into water	150
23	Workers lack of attention	Soil contamination with old oil due to oiling	Soil pollution	135
24	Bad formation of working area	Droping to the soil	Soil pollution	120
25	Normal working conditions	Batteries evaporation in the battery facility	Emission into air	100
26	Parts are on the ground/ storing conditions	Presence of oily parts on the soil	Soil pollution	60
27	At the time of work	Paints, thinner, polyasbitol and bitulite emissions	Emission into air	50
28	Substancesare deposed directly to the soil	Deposing the substances from manholes cleaning	Soil pollution	50
29	Ispumpavanje vode – radi korektivnog održavanja	Prisustvo zauljene i zakatranisane vode u zemlji	Soil pollution	50
30	Trafo facility elements cleaning due to prevention of electrical stroke tracks appearance	Evaporations at the time of cleaning with the thinner	Emission into air	50
31	Service user requests	Emissions at the time of re-packing bananas, food and other goods	Emission into air	50
32	Work regime	Electrical energy consumption	Use of raw materials and resources	25
33	Work regime	Water consumption	Use of raw materials and resources	25

34	Work regime	Fuel, oil, washing devices consumption	Use of raw materials and resources	25
35	Work regime	Electrical energy consumption	Leakage into water	25
36	Washing the mixer	Dropping the concrete into the atmospheric sewage	Leakage into water	5

NOTE: Aspects with risk level higher than 400 belong to the group of important aspects and are registered into the Registry of significant aspects, in accordance with the procedure IP.14- Identification and evaluation of environmental aspects

Environmental issues in the port operations primarily include the followings:

- Water usage
- Air emissions
- Waste management
- Energy management
- Noise
- Climate change resilience

3.1 Water usage

Water network is very complex and consists of various materials. Cross sections of water network vary from Ø1/2'' to Ø250.

Daily and weekly water spending control is carried out.

Preventing losses is carried out by monitoring critical points on water network. The length of water network whose cross section is bigger than Ø50 is cca 110000 m.

Water used on Port of Adria area is municipal, but beside that, the physical and chemical analysis and control is carried out once a year. Water quality is satisfactory.

Year	Water sales to cargo ships	Water sales to cruise ships	Water usage at port	Total Amount
2014	2657	0	39505,02	42162,02
2015	4396	0	22167,17	26563,17
2016	1631	1511	18976	22118
2017	4045	2120	28631,21	34796,21
2018	1558	1003	27594,01	30155,01

	1	2	3	4	5
Total Amount	42162,02	26563,17	22118	34796,21	30155,01
Water usage at port	39505,02	22167,17	18976	28631,21	27594,01
Water sales to cruise ships	0	0	1511	2120	1003
Water sales to cargo ships	2657	4396	1631	4045	1558

Table 3: Water usage by years

3.2 Air Emissions

Air emissions are generated from land- and sea-based sources during port and terminal activities. During the regular operation processes, land-based activities may result in combustion emissions from the use of port equipment, vehicles and engines (such as cranes, mobile port cranes, towing vehicles, trailers, forklifts, loaders, trucks, etc.).

During operations of a port, combustion exhaust emissions result mainly from diesel engines used for the propulsion of cruise ships, and ship-based auxiliary engines and boilers for power generation. In addition, combustion exhaust emissions are generated from land-based activities involving the use of vehicles.

Other sources of air emissions include volatile organic compound (VOC) emissions from waste transfer activities, in addition to dust emissions from operational phase activities.

PORT OF ADRIA

GLOBAL PORTS HOLDING

GREENHOUSE GASES								
			Unit	2015	2016	2017	2018	Info
SCOPE 1	1a	Diesel consumption - company vehicles - lt	litre	4719	5117	8317	10963	E.g. Petrol Ofisi records, company's purchase records
	1b	Gasoline consumption - company vehicles - lt	litre	/	/	/	/	E.g. Petrol Ofisi records, company's purchase records
	1c	Diesel consumption - Lorry/ truck /forklift etc. - lt	litre	149147	140075	202078	168595	E.g. Petrol Ofisi records, company's purchase records
	1d	LNG (Liquified Natural Gas) consumption - Lorry/ truck /forklift etc	kg	/	/	/	/	Purchase or inventory records
	1e	CNG (Compressed Natural Gas) consumption - Lorry/ truck /forklift etc	kg	/	/	/	/	Purchase or inventory records
	2a	Natural gas	m3	/	/	/	/	Invoice information
	2b	Fuel oil	litre	/	/	/	/	Purchase records/inventory movements
	2c	Solid Fuel (please indicate the type and unit)	kg	/	/	/	/	Purchase records/inventory movements
	2d	LPG (Liquefied petroleum gas)	kg	/	/	/	/	Purchase records/inventory movements
	3a	Refrigerant Gases - R22 (leak/year)	kg	/	/	/	/	If it is known, the amount of gas added to the cooling groups from the annual maintenance records. E.g: In 2015, during the maintenance of the cooling devices 25 kg of R410A gas was added. If these records do not exist, the second calculation option is the air conditioner devices, where the cooler gas capacities is calculated/devised from the Chiller group inventory. E.g. 9000 BTU / h split air conditioner contains 0.8 kg R410A gas. 10% annual leak rate is calculated on total inventory.
	3b	Refrigerant Gases - R410A (leak/year)	kg	/	/	/	/	
	3c	Refrigerant Gases - R407 (leak/year)	kg	/	/	/	/	
	3d	Refrigerant Gases - R404A (leak/year)	kg	/	/	/	/	
	3e	Refrigerant Gases - R134A (leak/year)	kg	/	/	/	/	
	4a	CO2 fire extinction system	kg	/	/	/	/	leak use + renewal
	4b	HFC 227 ea fire extinction (leak/year)	kg	/	/	/	/	FM 200 fire extinguishing systems total HFC227 ea gas capacity
	4c	SF6	kg	/	/	/	/	Transformer cutting gas, SF_6 gas capacity
	5	Generators (Diesel consumption)	litre	/	/	/	/	Purchase registrations / amount consumed or working hours of the generator
SCOPE 2	6a	Electricity Consumption	kWh	2.063.544,05	1.771.496,06	1.649.261,50	1.566.198,50	Invoice information
	6b	Steam, Hot water etc purchase from third party	kWh					
		GHG Reduction						
	7	Renewable Energy (please indicate the type)	kWh					(e.g. Wind, solar etc.)

Table 4: Greenhouse Gases Usage by years

3.2.1 Air Emissions from Combustion Sources

The primary emissions from combustion exhaust sources are Sulphur dioxide (SO2), nitrogen oxides (NOX), carbon monoxide (CO), particulate matter (PM), and greenhouse gases such as carbon dioxide (CO2). Depending on the fuel type and quality, other substances such as heavy metals, unburned hydrocarbons and other VOCs may be emitted in smaller quantities, but may have a significant influence on the environment due to their toxicity and/or persistence.

Recommended air emissions management strategies relevant to port and terminal operations include:

Application of air quality management procedures (including for GHG emissions) for ship operations while in port areas, such as:

- When practical and without affecting the safety of vessel navigation, use reduced ship propulsion power in port access areas.
- Where practicable, design port layouts and facilities to minimize travel distances and transfer points, for example from ships' off-loading and on-loading facilities to storage areas, and to avoid/minimize re-storage and reshuffling of cargo.
- Where practicable, upgrade land vehicle and equipment fleets with low emission vehicles, including use of alternative energy sources, and fuels/fuel mixtures (e.g., vehicle and equipment fleets powered by electricity or compressed natural gas, hybrid locomotives, etc.).
- Maintain cargo transfer equipment (e.g., cranes, forklifts, and trucks) in good working condition to reduce air emissions. Encourage reduced engine idling during on- and off-loading activities.

Port of Adria JSC does not carry out ship operations - handling bulk cargoes, only storing and container stuffing. All measures of precaution are taken with the defined technological procedures so that air emissions are minimized.

The calculation of data on emission of GHG is shown in the table below:

	Adria/POR		
(tons CO_2)	2016	2017	2018
Scope 1	389,9	565,0	482,2
Tools	389,9	565,0	482,2
F-gasses & SF6	0,0	0,0	0,0
Fuels used in buildings	0,0	0,0	0,0
Generators (diesel)	0,0	0,0	0,0
Scope 2	522,6	486,5	462,0
Electricity consumption	522,6	486,5	462,0
TOTAL	912,5	1.051,5	944,2

Table 5: Port of Adria Scope 1 and 2 CO2 emission

3.2.2 Dust

Emission of dust in the Port of the Adriatic Sea occurs during technological operations.

The main source of dust that is cast during the handling and storing operations of bulk cargoes (unloading from truck to warehouse, loading cargo with the loader / bob cat with loading spoon, handling from warehouse to the container).

Emissions from transport vehicles on concession area of Port of Adria also make a significant share in the total emissions fund, as well as secondary dust emission from active surfaces under wind influence.

It is quite certain that, under certain conditions, small fractions can be carried at greater distances. Under these circumstances, it is necessary to apply technological solutions to prevent the raising of small fractions, or to reduce total dust emissions.

Regular wiping /cleaning and vacuuming of operational and storage areas, with spill kit equipment and a mobile industrial vacuum cleaner for vacuuming dust, solid, dry and wet material is carried out.

Port of Adria JSC uses the following equipment and techniques for controlling fugitive dust on operational surfaces of terminal and warehouses:

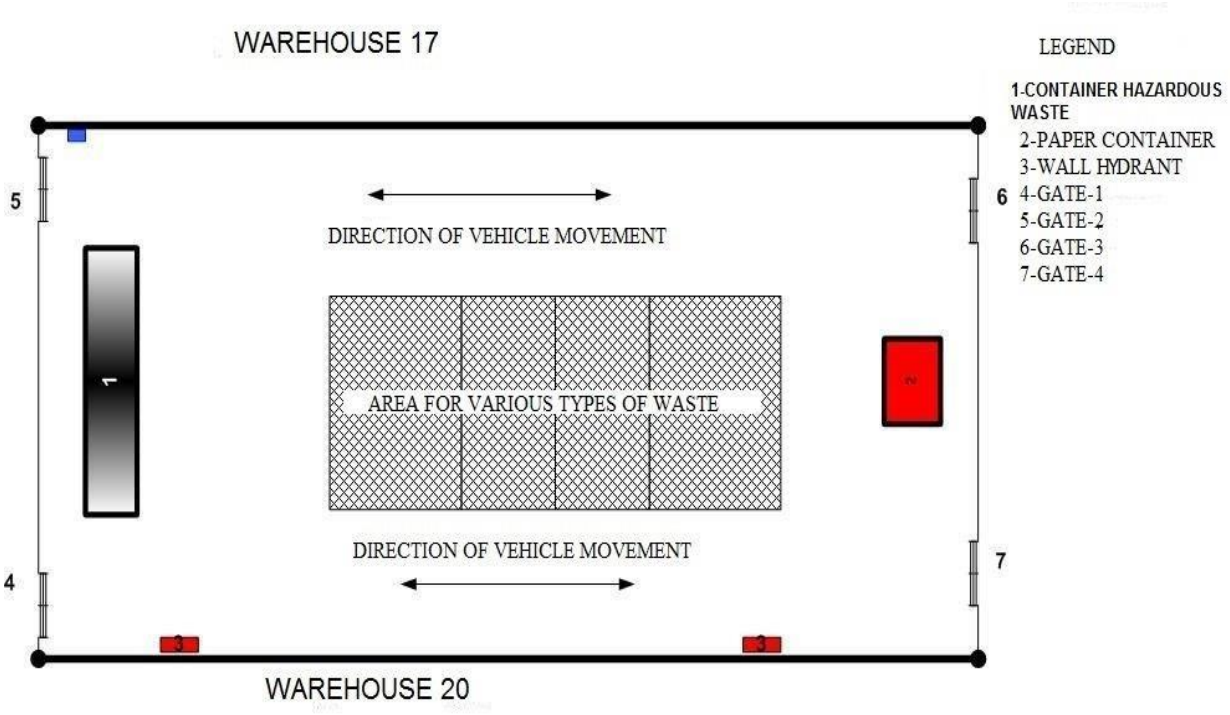
- Use telescoping arms and chutes to minimize free fall of materials and eliminate the need for slingers;
- Regularly sweep docks and handling areas, truck and rail storage areas, and paved roadway surfaces, and use vacuum collectors at dust-generating activities;
- Minimize dry cargo pile heights and contain piles with perimeter walls and/or wind break fencing;
- Cover transport vehicles.

3.3 Waste Management

Waste refers to any material or object resulting from production, service and other activities, objects out of use, as well as waste materials resulting from consumption and which are not for further use and must be discarded from aspect of producers and consumers. (Law on Waste Management (Official Gazette of Montenegro, No.39/16 as of 29.06.2016)).
Waste management is one of the key environmental management issues in Port of Adria JSC Bar.

Waste in Port of Adria is treated in a manner that ensures the protection of environment and prevents harmful impacts of waste. Waste collecting after the generation of certain amount of waste, its sorting on site (by origin, character, category), temporary storage, and its efficient removal are carried out in an organized manner by handing it over to certified waste management operators, in accordance with the procedure IP.15 Waste management and IU.03. Temporary Waste Storing (EMS Standard 14 001: 2015 request) and legal regulations.
Waste generated by Port of Adria JSC in all its technological / operational processes, mainly includes industrial waste. A smaller part of non-hazardous waste has a status of secondary raw material.

Port of Adria JSC has temporary location for waste disposal- temporary waste storage; between warehouse no. 17 and warehouse no.20. Temporary location for disposal of waste/temporary storage is in accordance with requirements of law and by-laws and it meets conditions which ensure protection of harmful effect of waste to environment, OHS of employees and firefighting protection.
Also, in accordance with Rulebook on the manner and conditions of waste storage (Official Gazette of MNE, 65/15 as of 20.11.2015), during storage of waste, a special attention is paid so that different types of waste do not mix, especially different types of hazardous waste, as well as the waste not yet categorized, until obtaining laboratory finding on examination of that waste.



3.3.1 Types of waste

By reviewing technological/operational processes and materials which are used in the process, the waste types generated on the Port of Adria JSC's area are identified and given below. According to the Waste Catalogue they are as follows:

11 - WASTES FROM CHEMICAL SURFACE TREATMENT AND COATING OF METALS AND OTHER MATERIALS; NON-FERROUS HYDRO-METALLURGY

11 01 other waste containing hazardous substances

13 – OIL WASTES AND WASTES OF LIQUID FUELS (except edible oils, and those in chapters 05, 12 and 19)

13 01- other hydraulic oils

13 02 – waste engine, gear and lubricating oils

15 – WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED

15 01 – packaging (including separately collected municipal packaging waste)

15 02 – absorbents, filter materials, wiping cloths and protective clothing

16 – WASTES NOT OTHERWISE SPECIFIED IN THE LIST

16 01 – end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance

16 02 – wastes from electrical and electronic equipment

16 06 - batteries and accumulators

17 – CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)

17 01 – concrete, bricks, tiles and ceramics

17 02 – wood, glass and plastic

17 04 – metals (including their alloys)

17 06 – insulation materials and asbestos-containing construction materials

20 – MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS

20 03 – other municipal wastes

3.3.1.1 Waste oils and oily cloths

Waste oil treatment, as a separate waste stream, which is generated in Port of Adria area, is carried out in accordance with the Rulebook on Waste Oil Treatment (Official Gazette of Montenegro No. 64/11). These oils are also collected and temporarily stored in an underground tank, of the capacity of 20,000l. The underground reservoir is protected from atmospheric influences, located on a solid foundation.

Oily cloths are temporarily stored in barrels with the label for the type of waste and the label for hazardous waste.

3.3.1.2 Sludge and damp water

Sludge and damp water are formed when cleaning and washing fuel and separator tanks. Cleaning, washing of fuel reservoirs and disposal of sludge from a separator is carried out by an authorized operator, with which Port of Adria concluded a Contract on Service Provision.

3.3.1.3 Waste tires

On Port of Adria area, a certain amount of waste tires is generated. Waste tires are temporarily placed at a specific location of the temporary waste storage.

Waste Tire Management is regulated by Article 49 of the Law on Waste Management ("Official Gazette of Montenegro" No. 39/16).

3.3.1.4 Waste from electronic and electrical products

Waste from electronic and electrical products is generated on the Port of Adria area, (when replacing computer equipment, etc.). This type of waste can have characteristics of hazardous and non-hazardous waste.

This kind of waste has to be disposed at the place where it is generated, in the work premises and then disposed by waste type, temporarily stored in a separate box in the temporary warehouse.

Waste management of electrical and electronic products is regulated by Article 46 of the Law on Waste Management ("Official Gazette of Montenegro" No. 39/16 as of 29th June 2016)

3.3.1.5 Waste from batteries and accumulators

Waste batteries and accumulators management is regulated by Article 50 of the Law on Waste Management ("Official Gazette of Montenegro" No. 39/16 as of 29th June 2016). The places of generation of this type of waste are work machines, forklifts, cranes, passenger vehicles etc.

Waste from batteries and accumulators is temporarily disposed in temporary storage, in a box with the indication of the waste type and the indication for hazardous waste.

3.3.1.6 Construction waste containing asbestos

Construction work involving asbestos-based construction waste generated in Port of Adria is carried out in accordance with the Rulebook on Construction Waste Management, Method and Procedure for Construction Waste Processing, Conditions and Method for Deposing Cement Asbestos of Construction Waste (Official Gazette of Montenegro no. 50/12).

Asbestos waste will be temporarily stored in bags, with indication of the waste type and hazardous waste mark. Bagged hazardous waste is visibly and clearly marked.

Transport of asbestos waste to a temporary disposal site will be carried out in bags, to prevent the emission of asbestos fibers to the greatest extent.

Hazardous Waste Storage is regulated by the Rulebook on the Method and Conditions of Waste Storage (Official Gazette of Montenegro number 65/15). Hazardous waste is stored in storage containers (barrels, containers and other containers) on site - temporary storage, which is secured and under constant surveillance.

Information on the amount of hazardous waste generated is kept in accordance with the Rulebook on the form, content and manner of filling in the waste transport and waste records form, annual waste report, contents and manner of keeping the data register and the content and form of the summary report (Official Gazette of Montenegro, No.46 / 10).

Given that in Montenegro there is no landfill for hazardous waste, the Port of Adria, as its generator, is obliged to temporarily and adequately store this properly marked waste, temporarily storing it in a prescribed manner until its final disposal, i.e. takeover by an authorized institution.

The standard hazardous waste management procedure consists of collection at the place of generation, classification, records keeping, temporary storage and disposal of waste.

Data on types and quantities of hazardous waste							
No.	Hazardous waste name	Hazardous waste number	Method of determination (measuring, calculation)	Hazardous waste quantity			
				2017		2018	
				Processing	Removal	Processing	Removal
				t/year	t/year	t/year	t/year
1	Polyasbitol	08 04 09*	Measuring	/	0,17	/	/
2	Other motor oils, oils for gear sticks and lubrication	13 02 08*	Measuring	/	8,91	/	2,18
3	Sludge from oil and water separator	13 05 02*	Measuring	/	2,6	/	0,15

4	Oily water from oil/water separator	13 05 07*	Measuring	/	/	/	0,93
5	Oily cloths/ carpets	15 02 02*	Measuring	/	5,28	/	/
6	Oil filters	16 01 07*	Measuring	/	0,24	/	0,29
7	Batteries	16 06 01*	Measuring	/	1,534	/	/
8	Non-organic waste containing hazardous substances	16 03 03*	Measuring	/	/	/	2
9	Soil and rocks containing hazardous substances	17 05 03 *	Measuring	/	2,18	/	/

3.3.2. Non – hazardous waste

Waste paper and cardboard is separated and collected in the organizational units where it is created and is then disposed at the determined location on a temporary storage, protected from atmospheric impacts.

In March 2018, Port of Adria launched activities on separation and collection of waste paper, with the aim of further handing over to recycling, by placing cardboard boxes at certain locations in departments.

Construction waste is temporarily stored at a defined location in a temporary warehouse.

Waste wood (pallets) is temporarily stored in an open space, at a precisely defined place for temporary storage.

Metal waste is temporarily stored in a defined location, which is marked and available for access of vehicles carrying out loading and / or taking over.

In the previous period, Port of Adria sold scrap metal (scrap iron) through bidding, to authorized organizations, which have taken it over and continued distributing it, and on 30.03.2018, Port of Adria JSC concluded the contract with "Hemosan" Bar.

3.3.3. Communal waste

Mixed municipal waste is disposed in containers on Port of Adria JSC locations and those are emptied by the competent Hemosan Company according to the defined work dynamics. This waste is not initially classified, i.e. there are no specific containers for bio waste, plastics, glass etc. We plan to place specific containers and classify the waste in that manner, and by doing so, to provide separate transport to treatment/recycling.

Data on types and quantities of non-hazardous waste							
No.	The name of non-hazardous waste	Number of non-hazardous waste	Method of determination (measuring, calculation)	Quantity of non-hazardous waste			
				2017		2018	
				Processing	Removal	Processing	Removal

				t/year	t/year	t/year	t/year
1	Meticulous metals	17 04 07	measuring	/	/	/	57,74
2	Meticulous construction waste	17 09 04	measuring	/	51	/	/
3	Run off electronic equipment and electrical equipment	20 01 36	measuring	1,92	/	/	/
4	Metals	20 01 40	measuring	/		/	11,94
5	Meticulous communal waste	20 03 01	measuring	/	1493 m^3	/	1493m^3

3.3.1 Ship Generated Wastes

Port of Adria JSC Bar has concluded the contract with the authorized institution for collection of ship generated waste.

3.3.2. Spill Prevention and Control Planning

Leaks, liquid, oils and emulsions spills (hazardous substances or waste with the properties of hazardous substances) may occur due to inadequate handling, inadequate packaging or storing conditions.

While working with the hazardous substances, including hazardous waste, incidents (undesired events without consequences) and accidents (undesired events with consequences) occur.

In order to prevent serious consequences of leaks and spills, Port of Adria provides adequate protective equipment for spills: 200 l container, absorbents (pillows, sand, zeolite, sponge masses etc.), shovel with long handle, the small shovel and also the obligatory equipment for employees engaged in possible recovery actions (eye glasses, protective suit, gloves, boots resistant to acids and bases). Equipment for incident leaks is on storing and handling locations on easily accessible places (so called spill kit usage is recommendable).

Leaks and spills of hazardous substances must be recovered as per the Instruction and internally registered.

Prior to commencement of every new business project – new cargo handling, Port of Adria requests its partners to submit MSDS (Material Safety Data Sheet) in order to prepare its area and employees and provide adequate equipment.

As per requirements of ISO 14001 EMS standard and legal regulation, Port of Adria JSC has a Procedure for reacting in extraordinary situations and Instructions for reaction in extraordinary situations in place. The team with clear duties and responsibilities for reacting in extraordinary situations is also appointed.

Pursuant to legal requirements of Montenegro, Port of Adria engaged external, third party, Advisor for safety in the transport of dangerous cargoes, who identified and marked all areas in the port sensitive to spills and leaks of hazardous substances.

3.3.3 Wastewater (Port Sewage, Storm water, and Ship Wastewater)

There are atmospheric water and water from separator for oil and lubricants on Port of Adria JSC area.

Atmospheric sewage on Port of Adria JSC is very complex, connected to exhaust pipes on pier quays and is designed for large amount of waters.

Atmospheric sewage is built from different types of materials, and cross section varies from Ø75 to Ø900. There are drainage wells on piers that are also connected to the existing atmospheric sewage.

Fecal sewage on Port of Adria JSC area is very complex, its total length is 9000m and its cross sections vary from Ø50 to Ø250.

The main pipe of fecal sewage passes through Port of Adria JSC area as well as the pre-pumping station of the main municipal sewage is located on Container Terminal.

The pressure pump directs fecal sewage to the pipe behind Volujica hill, which lets the sewage in the sea.

In case of the pressure pump malfunction, there is a pre-pumping station that lets fecal sewage to the port basin, in the sea between Pier 1 and Pier 2. (The leakage occurred in 2018 once, and sea water analysis showed negative results, as stated in 5.2.1).

Separator for purifying waste waters (for oil and lubricants) is located near the equipment wash spot. Separator and reception bars cleaning is carried out by the authorized company, as per Port of Adria JSC request. In 2018, physical and chemical analysis of waste waters from the separator was carried out (as stated in 5.2.1).

3.4 Energy Management

Electric and magnetic power of Bar port is a separate part of the power system, which is connected to power supply network of Bar and Montenegro by twin 35 kV cable. The power grid of the Bar port consists of 35 kV, 10 kV and 0.4 kV cables. All the cables in the Bar port are underground. The largest part is laid in cable sewerage and coastal energy channels and tunnels. Only 35 kV cables are placed directly on the ground along the entire length. Flexible rubber cables through which the coastline mechanism is connected to the network are exception. These cables are connected to the ground ones in the manholes directly or through the appropriate sockets and if necessary partially extruded on the concrete board, and partly wound on the cable drum, which carries the means of mechanization on itself.

On Port of Adria JSC area there are the following sub-stations:

- One substation 35 / 10kV "Luka Bar" 2x8MVA

- Nine substations 10 / 0,4kV, power of 1x630kVA to 2x1000kVA + 630kVA, TS-3, TS-4, TS-7, TS-8, TS-10, TS-17 TS- Reefer station.

Port of Adria JSC Bar receives the electrical power of the voltage of 35 kV and 10 kV, which is then transmitted to third parties, after being decreased to the voltage of 10 kV and 0, 4 kV. Also, Port of Adria JSC pays only for the 50 % of electrical power difference between the amount that it spends and the amount transmitted to third parties (companies in the vicinity of the company). Other 50 % are paid by Port of Bar JSC, the other company in the vicinity, with which we share the electrical network. The price that Port of Adria JSC Bar pays to Elektroprivreda (National Company for power generation and supply) is lower than the price as per which Port of Adria JSC Bar sells to the third parties on the voltage of 10 kV and 0,4 kV. In that light, if the situation is that if more electrical power is submitted to third parties, than Port of Adria JSC spent, Port of Adria can even obtain financial gain from Elektroprivreda.

Year	Total kWh - sum	Total kWh - third parties	Difference (sum / third parties)	Port of Adria JSC - kWh (50%)	Port of Bar JSC KWh (50%)	Percentage Third parties / sum
2014	9.757.885,00	5.369.704,13	4.388.180,87	2.194.090,44	2.194.090,44	55,03
2015	9.709.837,00	5.582.748,90	4.127.088,10	2.063.544,05	2.063.544,05	57,50
2016	9.569.610,00	6.026.617,90	3.542.992,10	1.771.496,05	1.771.496,05	62,98
2017	9.046.110,00	5.747.587,00	3.298.523,00	1.649.261,50	1.649.261,50	63,54
2018	9.041.663,00	5.909.266,00	3.132.397,00	1.566.198,50	1.566.198,50	65,36
TOTAL:	47.125.105,00	28.635.923,93	18.489.181,07	9.244.590,54	9.244.590,54	60,77

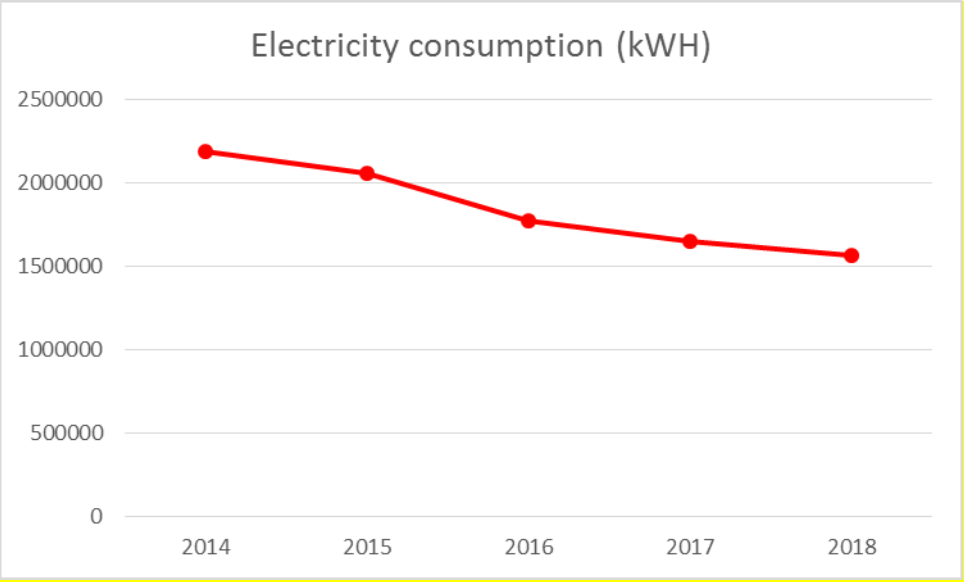


Table 8: Electricity Consumption by years

3.4.1 Creating a Strategy for Sustainable Energy Modernization

Ensuring reliability throughout that modernization of the electric system requires a combination of policy, process and technology-driven solutions. Port of Adria Bar works closely with local authorities, regional and agencies to develop a long-term strategy.

3.5 Noise

Noise is generated from several sources in Port of Adria JSC, including ship traffic, port operations, maintenance equipment, all of which is of temporary character with the highest degree of presence at the location of the works execution.

The favorable circumstance that the Port of Adria JSC concession area is located in the industrial zone, so that the level of noise to the first individual and residential buildings is lower than the allowed values, bearing in mind that the allowed noise level is 60dBza day and 50 dB per night.

As per legal and OHSAS 18001:2007 requirements, Port of Adria carried out the examination of working environment conditions – micro climate parameters, lightening, noise, vibrations and chemical hazards. As per evaluation of the measured values, the finding was that noise and vibrations were not a hazard on any of the work places.

3.6 Climate Change Resilience

Climate impacts on environment of Port of Adria

Port of Adria JSC is certified and implementing the Quality Management and Environmental Management System in accordance with the ISO 14001: 2015 standard, which confirms the commitment to the quality of processes and services, as well as the tendency to preserve the environment. ISO 14001 was first published in 1996 and specifies the requirements for a robust environmental management system, through improvement of environmental performance, fulfillment of obligations for harmonization and achievement of environmental objectives. It is applied to significant aspects of the environment, in accordance with the criteria set by the Company to determine its significant aspects.

The following potential environmental impacts were identified by Port of Adria:

- Water
- Air
- Land

The environmental impact of Port of Adria’s operation is not expected to be significantly affected by climate change. Under pressure from climate change, the following potential environmental impacts need to be considered:

- Increased energy use and associated GHG emissions due to the effect of increased temperatures on refrigeration

- Increased run-off due to precipitation

Increased energy use for refrigerated containers due to higher temperatures will increase Port of Adria's GHG emissions to the atmosphere.

Refrigerated containers, which are stored on a frigo station in the Port of Adria area, contain refrigerant fluid groups HFC - R134a.

Freon R -134 has no effect on the destruction of the ozone layer, but has a significant effect on global warming, as well as on the impact on the occurrence of acid rain.

Designers of products and equipment currently using HFC are looking for alternatives with lower GWPs, which provide, among other things, a high degree of energy efficiency and good environmental performance, which is a combination of high energy efficiency and low GWP (global warming factor and used to compare impact different cooling fluids to global warming).

Climate change models predict that significant changes in rainfall levels will occur as a result of temperature rise. In theory, changes in rainfall could increase the risk of negative impacts on water quality, through increased run-off, overwhelming of the drainage system and exceeding the capacity of oil/water separators. However, very increased precipitation is unlikely to overwhelm the port's drainage system and lead to surface flooding, because the atmospheric sewerage system of the port is designed to receive large amounts of water. Atmospheric sewage on the area of Port of Adria JSC is very scattered and connected by lateral pipes to the piers quays.

Adaptation and the environment

The priority of the Company, through education and continuous awareness, is to encourage change in behavior, to build employee awareness of climate change, with the necessary primary adaptation measures for the purpose of prevention, preparedness and action to prevent, mitigate and adapt to climate change.

4. RESPONSIBILITIES AND RESOURCES

4.1 GPH Headquarters and Port of Adria Organization Structures

Global Ports Holding (GPH) has a well-defined operating model that relies on four distinct pillars: organization, governance, functions and technology. The proprietary GPH operating model centralizes management for every major structure's operations within its enterprise and is based on operational and commercial synergies to promote maximum efficiency. There are significant differences (from concessions to legislation) in the operations of each of GPH's ports, and as a result, there is no single operating model which covers all ports and headquarters.

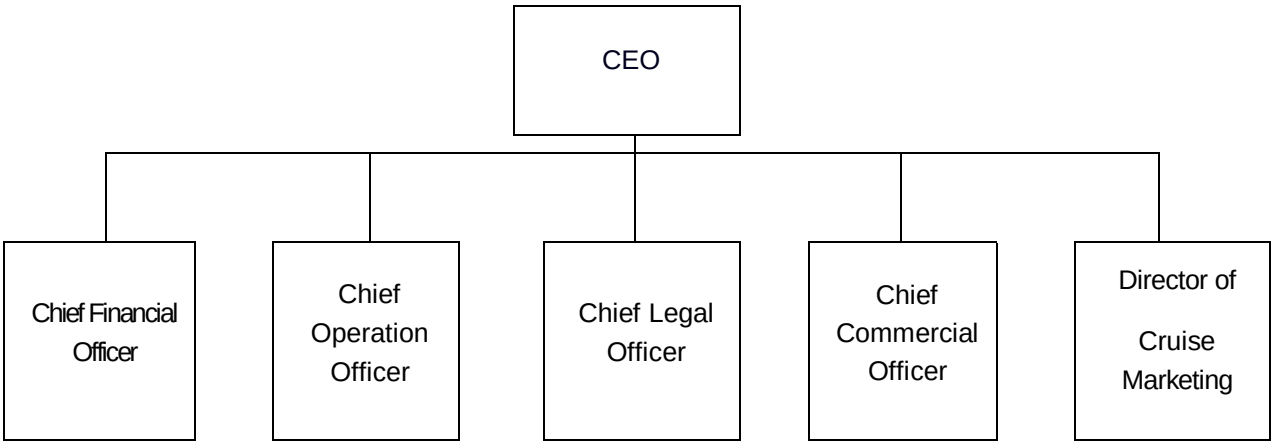


Figure 3: GPH Organization Structure

The operating model's pillars are defined in harmony within GPH's consolidation agenda: potential synergy, service opportunities and operational efficiency. As such, GPH headquarter operations and port operations are able to share and combine best practices.

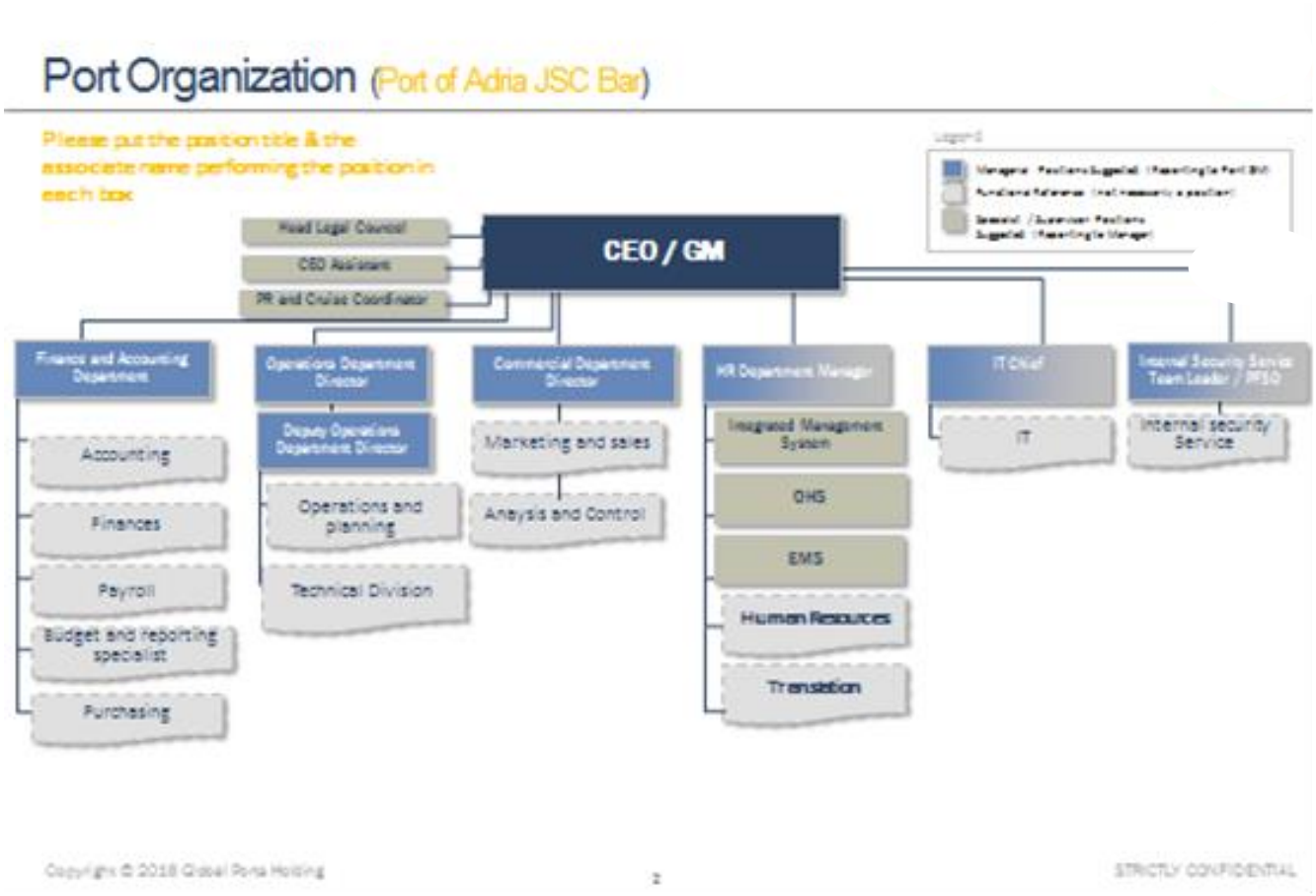


Figure 4: Port of Adria Organization Structure

4.2 Responsibilities of Departments on Environmental Activities

The below table refers those liabilities affecting the environment at Port of Adria JSC, which are specified in the requirements of PERS certification. These are tasks that may cause, control or minimize environmental impacts when defined. And that may cause environmental impacts if control was lost, or may conclude in a breach of environmental policy guidelines or regulations.

TASK	JOB TITLE	DEPARTMENT
Port Operations (Dredging)	*There is not any operation to be specified under this section.*	
Port Operations (Navigation)	*There is not any operation to be specified under this section*	
Port Operations (Shipping)	*There is not any operation to be specified under this section.*	
Port Operations (Terminals)	Operations Director	Operation Department
Cargo Handling Operations	Operations Director	Operation Department
Jetty/Wharf Management	*There is not any operation to be specified under this section.*	
Site Management	Operations Director/ Technical Manager	Operation Department
Strategic Planning	*General Manger*	*Top Management*
Supplies acquisition	*There is not any operation to be specified under this section.*	
Licensing/Permits	*EMS Specialist/ Technical manager*	*HR Department/Operations Department*
Quality Management	*IMS Coordinator*	*HR Department*
On site Contractor Management	*Technical manager/ Operations Director*	*Operations Department*
Emergency Planning	*Operations Director/ PFSO*	*Operations Department/ Internal Security Service*
Waste Management	*Responsible person for waste management/ EMS Specialist*	*Operations Department/ HR Department*
Marina / Slipway management	*There is not any operation to be specified under this section.*	
Environmental Document Management	*EMS Specialist/ Responsible person for waste management*	*HR Department/ Operations Department*
Environmental Data Management	*EMS Specialist/ Responsible person for waste*	*HR Department/ Operations Department*
Soil pollution assessment	*Environmental Consultant*	*Independent Consulting Company*
Air Quality monitoring	*Environmental Consultant*	*Independent Consulting Company*
Energy and Carbon Footprint monitoring	*Environmental Consultant*	*GPH Head Office*
Water Quality monitoring	*Environmental Consultant*	*Independent Consulting Company*
Noise management	*Environmental Consultant*	*Independent Consulting Company*
Vehicular Management of Terminal traffic	*Operations Director*	*Operation Department*

Table 9: Environmental Responsibilities of Key Personnel

5. CONFORMITY REVIEW

Port of Adria strives to do business responsibly and aims to integrate environmental sustainability to the core of its business strategy. The Port is aware of the environmental risks inherent within the business and committed to manage and reduce environmental footprint caused by its activities.

The Port's environmental impacts and risks are mainly focused around natural resource, water and energy consumption, emissions, air and water pollution, handling of hazardous waste, effluents, and impacts on marine ecosystems due to noise and vibration. The Port responds these impacts and risks in a systematic and proactive manner in line with its environmental management systems.

To foster environmental sustainability, the Port manages environmental matters in line with laws and regulations where the Company operates, international environmental standards and the Company's Environmental Policy.

5.1 Environmental Impact Assessment Legislation

The Agency for the Protection of Nature and Environment has conducted a procedure of environmental impact assessment and has issued its approval – Decision on:

1. Study on environmental impact assessment: Rehabilitation of the Pier 1-Nort Quay, construction of RO-RO ramp in Port of Bar, No. UPI -101 / 2-02-728 / 19 as of June 8,

2. Study on environmental impact assessment: Rehabilitation of the Pier 1 No.02- UPI-1484/20 as of 03.11.2016.

5.2 Environmental Permit and License

5.2.1 Waste Management

1.Agency for the protection of nature and environment, pursuant to Article 54 of the Law on Waste Management (Official Gazette of Montenegro no. 64/11 and 39/16) issued a Decision number UPI- 101-1556 / 1-02-90 / 3, as of 01.09.2017 and approved the Waste Management Plan for the following types of waste: 13 02 08 * other motor oils, lubricating oil, 13 01 13 * Other hydraulic oils, 13 02 06 * Synthetic, motor oils, gear oils and lubricants, 11 01 98 * Other wastes containing hazardous substances, 16 01 03 waste tires, 16 01 07 * oil filters, 15 02 02 * absorbents, filter materials (including filters not otherwise specified) wipes, protective clothing, which are contaminated with hazardous substances, 16 06 01 * lead batteries, 20 01 36 Electronic and electrical wastes, 20 03 01 mixed communal waste,

Approval of the Waste Management Plan is issued for the period until 01.09.2020. (Attached)

2. Agency for the Protection of Nature and Environment, pursuant to Article 54 of the Law on Waste Management (Official Gazette of Montenegro no. 64/11 and 39/16) , issued the Decision No. 101/2 -02-1557 / 1, as of 11.09.2018 and approved the Non-hazardous construction waste management plan, which refers to the following types of waste: 17 01 01 concrete, 17 01 02 bricks, 17 01 03 tiles and ceramics, 17 02 01 wood, 17 02 02 glass, 17 02 02 plastics, 17 01 06 * The size of a particular fraction of concrete, bricks, plate and ceramics, 17 04 07 Mixed metals, 17 06 01 * Insulating material containing asbestos-glass wool.

Approval of the Waste Management Plan for Construction Waste is issued for the period until 28.09.2021. (Attached)

By Decision of the Agency for Nature and Environment protection, Port of Adria JSC obligation is stipulated, that after temporary storage of waste, lasting up to 1 year pursuant to Article 77 paragraph 1, to create a solution for permanent waste disposal (waste disposal to collector, processor or company registered in the register of companies with physical waste take-over or export of waste).

When a certain amount of waste is collected in temporary storage, a person responsible for waste management initiates the waste disposal activities to the authorized operator by the prescribed procedures from the framework of the Environmental Management Committee and the IMS and the waste is dispatched according to the prescribed documentation, the requirements of Standard and legislation:

- Weighing sheet (IZ.35.14)

- Waste Disposal Record (IP 21)

- Waste Transport Form (Rulebook on the manner of waste records keeping and the contents of the waste transportation form 3. Official gazette of Montenegro, No. 50/12 of 01.10.2012)

- When it comes to hazardous waste, the authorized operator with which Port of Adria JSC has a contract is under an obligation to make a timely notification in writing that the waste is destroyed in the quantity delivered by submitting evidence / document on the dispatch of hazardous waste across the border (since Montenegro does not have the operator to destroy the hazardous waste, it is dispatched to Austria and Hungary) certified by waste recipient.

Port of Adria JSC engages the authorized organization Hemosan from Bar, which has the appropriate permit for adequate waste disposal and its further treatment, for the dispatch of waste in accordance with the applicable legal regulation. Port of Adria JSC has concluded the following contracts with Hemosan:

1. Contract for takeover, disposal and treatment of communal and construction waste, No. 1563 as of 30 March 2018,

2. Contract for takeover, disposal and treatment of hazardous waste, no. 1569 as of 30 March 2018.

By the Decision, it was also ordered that Port of Adria, as a waste producer, is responsible for submitting a report to the Agency for the Protection of Nature and Environment for the produced quantities of waste, during the previous year, until 1st March of the current year at latest, according to the Rulebook on the manner of keeping the records of waste and the contents of the form on the waste transport (Official Gazette of Montenegro, No. 50/12). Pursuant to the aforementioned, Port of Adria, submitted the Annual Waste Report for 2018 to the Agency for the Protection of Nature and Environment, No. 03-D-207/1, as of 19th February 2019 (attached).

5.2.2 Water and Waste Water Management

In October 2018, samples of sea water were taken, by the authorized institution- the Center for Eco toxicological Studies in Podgorica, Montenegro.

According to the results of the Report on the physical-chemical analysis of seawater samples, no. 5564/3 as of 15.11. 2018, the findings are as follows:

1. No. 919/04 – Seawater sample taken from the northern quay of the Pier II head, corresponds to the A3 class of the Rulebook on Classification and Categorization of Surface and Ground Waters (Official Gazette of Montenegro No. 02/07)

2. No. 920/04 – Seawater sample taken from the southern quay of the Pier II head does not correspond to any of the classes of the Rulebook on Classification and Categorization of Surface and Ground Waters (Official Gazette of Montenegro No. 02/07) due to increased content of nitrite, orthophosphate and ammonium ion detected and unpleasant odor of the observed water sample, as a result of the spillage of municipal waste water due to damage to the urban collector system that passes through this part of port basin.

3. No. 921/04 - Seawater sample taken from between Pier I and Pier II corresponds to the A3 class of the Rulebook on Classification and Categorization of Surface and Ground Waters (Official Gazette of Montenegro No. 02/07)

In July 2018, a physical and chemical analysis of wastewater from the separator for oil and oil derivatives was carried out by the Public Health Institute, Podgorica Montenegro.

On the basis of the report on results of laboratory tests and expert reviews, no. 5031 as of 17.10.2018, it was determined that the tested sample CORRESPONDS TO the conditions under the provisions of Article 1 of the Rulebook on the Amendments to the Rulebook on Quality and Sanitary and Technical Conditions for Discharging Wastewater to the Recipient and the Public Sewage, Method and Wastewater Quality Test Procedure, Minimum Test Number and Content of the Report on the established quality of wastewater (Official Gazette of Montenegro 45 / 08,9 / 10, 26 / 12,52 / 12 I 59/13).

5.2.3 Emission Management

In October 2018 air quality measurements were carried out by the authorized institution – Eco - toxicological Testing Center from Podgorica Montenegro, at one metering point, 24 hours, in front of warehouse no. 5, used for storing lead concentrate.

The monitoring includes measurement of all basic polluting substances (SO2, NO, NO2, O3, CO, PM10, C6H6, Pb, Cd, As, Ni, BaP) prescribed by the Act on Determining Pollutants, Limit Values and Other Air Quality (Official Gazette of Montenegro , No.25 / 12). Based on the results of Report no. 5564/2 as of 15th November 2019, only lead content in the twenty-four-hour sample of suspended PM10 particles was 1.91 compared to the prescribed standard for a middle annual value of 0.5µg / m3. The cause of this high measured lead value is emissions during operations with a lead concentrate at warehouse No. 5.

5.2.4 Noise Management

The noise that occurs during the technological procedures on Port of Adria area is primarily due to the means of mechanization, means of transportation and maintenance equipment, which is of temporary and is highest on the very site of works/ processes.

The favorable circumstance that the Port of Adria JSC concession area is located in the industrial zone, so that the level of noise to the first individual and residential buildings is lower than the permissible values, bearing in mind that the permissible noise level is 60dBza day and 50 dB per night.

5.2.5 Soil Pollution Management

In October, 2018, the land from cadastral parcel 111/4; on the concession area of Port of Adria JSC was sampled, physical and chemical analysis was carried out by the Center for Eco toxicological Examination Podgorica and report number 5564, as of 15.11 .2018 was submitted and it stated the following:

The Rulebook on Permitted Amounts of Hazardous and Hazardous Substances and Methods for their testing (Official Gazette of Montenegro, no. 018 / 17), determine the maximum permitted quantities of hazardous and harmful substances in the soil, which can lead to its pollution, and it refers to agricultural soil; It is not applicable to the soil, which is subject to physical-chemical analysis, as it is located in the industrial zone.

In order to provide an adequate opinion, the results of the analysis are compared with the maximum permitted concentrations for the chemical elements and organic substances prescribed in the EU countries, i.e. Italy, which prescribes the strictest criteria for all types of land.

By comparing the determined lead content (640mg / kg) with the maximum permissible concentration of lead in the industrial zone (1000mg / kg) and the zinc content in the analyzed soil (574mg / kg) with the maximum permissible concentration of zinc in the industrial zone (1500mg / kg), it is concluded that they are below the

standard values for the industrial zone. The content of polyromantic carbon dioxide is below the level, which is standardized in Italy for the industrial zone as maximum permitted (100mg / kg).

The content of all other analyzed elements and organic substances is below the standards defined by the Rulebook on permitted quantities of hazardous and harmful substances and methods for their testing.

5.2.6 Chemicals Management

Port of Adria provides safety sheets (MSDS – Material Safety Data Sheet) at the time of chemicals handling and storing, from the aspect of environmental protection (and also OHS, fire protection, etc.) in accordance with the requirements of the legal regulations and the Integrated Management System, for the purpose of preparation and implementation of environmental protection measures.

In warehouses where certain types of chemicals are stored, the Port of Adria highlights / puts safety sheets at the sites already foreseen, so that the employees who participate in certain business and operational activities are familiar with the dangers and hazards of the goods / chemicals, as well as with the handling, handling in the event of a fire, in case of first aid, fire extinguishing.

Waste oil treatment, as a separate waste stream, which is generated in Port of Adria area, is carried out in accordance with the Rulebook on Waste Oil Treatment (Official Gazette of Montenegro No. 64/11). These oils are also collected in an underground tank in a temporary storage, of capacity of 20,000l. The underground reservoir is protected from atmospheric influences and is situated on a solid foundation.

When cleaning and washing the fuel tank and separator for oil and oil derivatives, sludge and oily water are formed. Hemosan Bar with which Port of Adria has a Contract on service provision, purifies, cleanses and takes over the mentioned waste.

5.2.7. Environmental Pollution Cadaster

Pursuant to the Rulebook on the more detailed content and method of taking records of environmental pollution cadaster (Official Gazette of Montenegro, 045/17 of 12th July 2017), Port of Adria is under an obligation to conduct monitoring of polluting substances emissions and submits the Form with Data on releasing pollutants for the previous year, no later than March 31 of the current year to the Agency for protection of nature and environment. Pursuant to aforementioned, Port of Adria, submitted the Form for Pollutant Release Data for the year 2018, number 03-D-598/1, as of 11 March 2019. (Attached).

5.2.8. Conclusion

In accordance with the requirements of the IMS Standards, and according to the IP 12 Compliance evaluation (with the Legislation) procedure, compliance with legal and other requirements in the field of environmental protection with the help of legal professionals from the Port of Adria JSC is periodically verified and the results are recorded in the Conformity Assessment Report IZ.12.01 (Attached please find the Report on compliance evaluation).

PORT OF ADRIA		Report on compliance evaluation 2018			
No.	Regulation	Frequency of reporting	Responsibility	Conformity	Deadline of compliance
1.	Law on environment protection (Official Gazette of Montenegro 052/16 as of 09.08.2016)				
	-waters protection	1 year	Top management/ EMS Specialist	yes	finalized
	- prevention from harmful chemicals effect Seveso facility	5 years	Top management/ EMS Specialist	yes	finalized
	-soil protection	1 year	Top management/ EMS Specialist	yes	finalized
	-Cadaster of pollutants	1 year	EMS specialist	yes	finalized
2.	Law on air protection (Official Gazette of Montenegro 043/15 as of 31.07.2015)	1 year	Top management/ EMS Specialist	yes	finalized
3.	Law on waste management (Official Gazette of Montenegro no. 064/11 as of 29.12.2011, 039/16as of 29.06.2016)				
	-Protection from harmful influence of waste – Plans on waste management	1 year/3 years	EMS Specialist	yes	finalized

	Rulebook on the manner of records keeping on waste and the content of the form on waste transport/ Waste report	1 year	EMS Specialist	yes	finalized
4.	Law on environment impact assessment (Official Gazette of Montenegro as of 09.08.2016)	As per process needs	Process owners/ EMS Specialist	yes	finalized
5.	Concession Agreement (27.12.2013)	1 year	CEO/ PoA Management	yes	Finalized
6.	ESAP –EBRD	At least once a year	CEO Assistant	partly	End of 2018

Drafted by: OHS and EMS Specialist		Approved by: CEO	

LEGEND:

YES – TOTALLY COMPLIES

NE- DOES NOT COMPLY

PARTLY – ONE PART OF REQUIREMENTS IS FINISHED/ THE OTHER PART IS UNDERWAY

CONFORMITY REVIEW TABLE

Significant environmental issues of Port of Adria	Index item	Calculation method	Target value	Indicator presentation (calculation details)	
				2017	2018
Saving of natural resources					
Water	legislation	measuring the annual water consumption	reduction in water consumption, the coefficient is lower by 2% compared to the previous year	34796,21 m^3	30155,01 m^3
Energy management	legislation	measuring Annual electric consumption	Reduction in electricity consumption, coefficient by 2% lower than in the previous year	1649261,5kW	1566198,5 kW
Fuel	legislation	Measuring annual fuel consumption	Reduction of fuel consumption, coefficient lower by 2% compared to the previous year	202 078 l	168 595 l
Paper	legislation	record of annual paper consumption	Reduction in paper consumption lower by 1% compared to the previous year	827 pieces (stacks) 71 (boxes of payrolls)	561 pieces (stacks) 42 (boxes of payrolls)
Sea water					
Sea water	legislation	Measurement / physical-chemical analysis of sea water	Positive Findings	/	Positive finding of sea water analysis
Soil					
Soil	legislation	Measurement / physical-chemical analysis of the soil	Positive Findings	/	Positive finding of soil analysis
Wastewater from oil separator and oil derivatives					
Coastal waters	legislation	Measurement / Physico-	Positive Findings	/	Positive finding of wastewater analysis

		Chemical Analysis of Waste Water			
Waste management					
Hazardous waste					
Old oil	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	8,91 t	2,18t
Oiled rags / carpets	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	5,28t	45kg
Oil filters	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	0,24t	0,29t
Batteries	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	1,534t	/
Sludge from oil / water separator	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	2,60t	0,15t

Land and rock containing dangerous substances	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	2,18t	/
Computers and electrical products	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	1,92t	/
Waste tires	Regulation on Waste Management	Measuring	Reduction, proper disposal and disposal of hazardous waste (2018 as a reference, without inspector's negative finding)	47 pieces	/
Non hazardous waste					
Paper, cardboard	Regulation on Waste Management	Measuring	Decrease, proper disposal and transport of non hazardous waste, (hand over of 50 % of collected paper)	/	4 t
Metal waste	Regulation on Waste Management	Measuring	Selection, collection and sale/ handover of metal waste	57,94t	11,94 t
Mixed building waste	Regulation on Waste Management	Measuring	Proper disposal and takeover of non hazardous waste	51t	/
Mixed municipal waste	Regulation on Waste Management	Measuring	to set up dedicated containers on the entire Port of Adria JSC area, by which this waste sorting will be carried out and thus separate treatment / recycling provided.	1493 m^3	1493 m^3
Air emissions					

Emissions into the air	Legislative regulations on the emission limit values of pollutants in air	Measurement of emissions of polluting substances into the air	Reducing all types of emissions through constant optimization of operations processes and strict application of technological processes	/	Measuring parameters SO_2, NO_2, PM_{10}, Ozone, CO, benzene, heavy metals (arsenic, cadmium, nickel) are within allowed limits. The content of Pb is only increased due to lead concentrate handling
Noise					
Noise	noise regulation.	Measurement of noise level	noise level that meets the appropriate legal requirements	Daytime Leq 100% Evening Leq 100% Nighttime Leq 100%	Daytime Leq 100% Evening Leq 100% Nighttime Leq 100%
Raising ecological awareness					
Raising ecological awareness of employees	Standard EMS 14001: 2015 requirements	Number of realized activities	12 activities per year	4 activities /year	12 activities/year

External stakeholders			Requirements relevant to EMS
Number	Stakeholder	Needs and requirements	
1	Clients	Security, quality and fast service	YES
2	Suppliers	Precise requests/ orders	YES
		Long - term cooperation	YES
3	Regulatory bodies/ Competent bodies/ Courts/ Government/ Port Authority	Compliance with laws and bylaws Decrease of court cases Compliance with the Concession agreement and Sales and Purchase Agreement Successful privatization	YES YES YES YES
4	Logistics operators Transporters	Increase of total efficiancy of logistics and transport direction Bar. Good cooperation that reflects to the possibility of attration of new goods (partners)	YES
5	Municipality	Paying taxes and municipial taxes	YES
6	Local community	Environmental protection (waste, pollution and noise)	YES
		Social responsibility (support to citizens and city development)	YES
		Contribution to unhindered traffic	YES
7	Competition	Presence and larger share on the market and PoA hinterland	YES
8	Waste operators	Managing waste and taking it over in accordance with the legislation	YES
Internal stakeholders			Requirements relevant to EMS
Number	Stakeholder	Needs and requirements	
1	Employees	Adequate working conditions	YES
		OHS	YES
		Clearly defined working duties	YES
		Good training in order to obtain comptenecies	YES
2	Owners/ Shareholders	Business volume increase	YES
3	Trade Unions	Compliance with all relevant laws and bylaws	YES
		Consistent compliance with General colective agreement	YES
		Signing Individual Collective Bargaining Agreement	YES
		Employees' safety and security	YES

6. ENVIRONMENTAL REPORT

As Appendix, we herewith submit the Environmental Report. The report consists of a total 20 pages and includes the year of 2018 data.

7. BEST PRACTISES

7.1 Costs for environmental protection

Environment protection involves expenses representing the sum of investments and ongoing expenses for activities related to environment protection.

Investments for environment protection comprehend the investments referring to environment protection activities (methods, technologies, processes, equipment and its parts etc.) in order to gather, teat, follow, control, reduce, prevent or remove pollution or any other environment degradation resulting from business activities.

Current affairs for environment protection comprehend the expenses for functioning and maintaining equipment for environment protection and paying the third parties for environment protection services in order to prevent, reduce, treat or remove pollution or any other environment degradation resulting from business activities.

1. Environment protection investments:

	First quarter of 2018	Second quarter of 2018	Third quarter of 2018	Fourth quarter of 2018
Procurement of spill kit equipment	429,50€	/	/	/
Industrial vacuum cleaner procurement	3.544,20€,	/	/	/
Temporary waste storage design	3.500,00 €	/	/	/
Procurement of cardboard boxes for separation and collection of waste paper	107,00€	/	/	/
Consulting services for standards implementation (QMS+EMS+OHSAS)	/	/	6 600,00€	/
Certification expenses (QMS+EMS+OHSAS) (with two yearly recertification visits for 2019 and 2020)	/	/	11.000,00 €	/
Plan on accident prevention draft	/	/	/	1 700,00€
TOTAL	7.580,70 euros	/	17 600,00 €	1 700,00€
Total investments in environment protection (first + second + third + fourth quarter)				26 880,70€

2. Current expenses for environment protection

	First quarter of 2018	Second quarter of 2018	Third quarter of 2018	Fourth quarter of 2018
Handing over communal waste	6 420,00€	6 420,00€	6 420,00€	6 420,00€
Separator for oils and waste removal cleaning	/	1 090,00€	/	/
Eco fee for hazardous waste	/	/	524,24€	786,36€
Handing over dangerous waste	/	/	2 200,00€	/
Waste waters analysis	/	639,10€	/	/
Sea water, air and soil monitoring	/	/	/	2 919,06€
Total	6 420,00€	8 149,10€	9 144,24€	10 125,42€
Total current expenses (first + second + third + fourth quarter) 33 838,76€				

7.2. Best practices

The best examples of good practice in Port of Adria refer to different categories of issues: energy, recycling, awareness and employees' awareness raising.

Port:	Port of Adria JSC Bar
Country:	Montenegro
Contact Person:	Marko Dedić
Position:	Operations and project coordinator
E-mail:	marko.dedic@portofadria.me
Environmental issue:	Energy efficiency Relevance to the 5 Es framework of the ESPO Green Guide: Exemplify, Enable, Engage, Encourage

- Port of Adria JSC is carrying out works in its Main Administration Building (total area) works on a complete replacement (350 bulbs in total) of standard lighting and introduces new system (LED) that lasts longer, heats less and uses less energy than other bulb types.

- Port of Adria has replaced wear off windows with a PVC, five chamber, A class, hard profile windows of 2, 8 mm thickness (158 windows totally) by which the energy saving is achieved and is useful in multiple ways, for Port of Adria JSC as a single user (heating and cooling price), and for the whole community (energy savings at the national level), and the global level of environmental protection in every aspect.

-Also, the replacement of AC devices is taking place in the Main Administration Building, with a higher energetic efficiency class for the purpose of decreasing electrical energy consumption.

Port:	Port of Adria JSC Bar
Country:	Montenegro
Contact Person:	Olivera Živanović
Position:	Responsible person for waste management
E-mail:	olivera.zivanovic@portofadria.me
Environmental issue:	Recycling Relevance to the 5 Es framework of the ESPO Green Guide: Exemplify, Enable, Engage, Encourage

In Port of Adria JSC waste is managed in a way that ensures the protection of environment and prevents harmful impacts of waste, where, after organized collection, sorting on the spot (by origin, character, and category) and is stored at a temporary location for waste disposal - temporary storage of waste. To arrange a temporary warehouse with additional equipment, cca 6 000 € is allocated in 2018.

- In March of the year 2018, we started activities on separation and collection of waste paper in our company, and one of the initial activities was to set up carton boxes at defined locations within business premises / facilities in Port of Adria JSC area for the purpose of office paper disposing and handing it over to recycling . We are in the process of negotiations with the authorized organization Podgorica “Deponija” for the removal of waste paper (the amount of collected waste is cca 4 t)

- In 2017, 1.9t of electronic and electrical waste was handed over to the authorized organization "Hemosan" for procession and recycling