J/10/83/1991, R 1158050-COD FISCAL
Str.Transilvaniei, nr. 132 ,
Tel.: 0238/711 155, fax: 0238/710 697; 0238/710 722
BUZĂU-ROMÂNIA

PROGRAM FOR PREVENTION AND REDUCTION OF GENERATED WASTE QUANTITIES

APPROVED

CEO

HUANG LIANG NENG

Date: 26.05.2022

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1. GENERALITIES

Waste management refers to the temporary storage, reuse, collection, transport, treatment, recycling and disposal of waste, the main purpose being to save raw materials by reusing recyclable waste, thus helping to reduce the pressure on natural resources.

The main objective in the field of waste management, according to Directive 2008/98/EC is to reduce the quantity of waste generated and its associated impact on the environment.

Prevention and reduction of resource consumption, practical application of the "waste hierarchy", classifies the different waste management options, from the best to the least environmentally friendly, as follows:

- ✓ prevention,
- ✓ reuse,
- ✓ recycling,
- ✓ energy recovery and
- ✓ disposal by incineration or storage.

According to this hierarchy, priority is given to preventing waste generation, followed by minimizing the quantity of waste, reusing waste, recycling, energy recovery and lastly, disposal by incineration or storage.

The first option is to prevent the production of waste, by choosing from the design phase the best technologies. If avoiding waste is not always possible, then the quantity of waste generated by reuse, recycling and energy recovery must be minimized.

A program for the prevention and reduction of waste must take into account certain basic considerations, including:

- ✓ Efficient management of resources and, respectively, of on-site waste;
- ✓ Designing a product based on reducing the consumption of raw materials and energy, consisting of an economic circuit built from the design phase so that the resulting waste is reintegrated into the process;
- ✓ Establishing measurable objectives and indicators;
- ✓ Voluntary targets and other tools.

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According to the definition in GEO 92/2021 on waste management, prevention means all the measures that must be taken before a substance, material or product becomes waste, in order to reduce:

- ✓ the quantity of waste, including by reusing products or extending their life;
- ✓ the negative impact of the waste generated on the environment and the health of the population;
- ✓ the content of hazardous substances of by-products and products.

A waste reduction program needs the company's commitment to pollution prevention, starting with management and mastered at the level of each employee.

ROMCARBON SA has implemented and certified an Integrated Quality Management System - Environment - OSH, according to the standards ISO 9001: 2015, ISO 14001: 2015 and ISO 45001: 2018.

The waste management process is carried out according to a documented procedure and is audited internally by the organization at least once a year and externally by the certification body SRAC ROMANIA.

This PROGRAM FOR THE PREVENTION AND REDUCTION OF THE QUANTITIES OF WASTE GENERATED FROM OWN ACTIVITY, has been elaborated in accordance with the requirements of the provisions of art. 44, para. (1) of GEO 92/2021 regarding the waste regime, and the requirements of the reference standard ISO 14001/2015, based on the waste audit performed at the company's headquarters / working point in Str. Transylvania no. 132, 120012 Buzau, Buzau County.

Annually, following an analysis performed by the top management, the Management Program is elaborated with objectives, measures/actions, indicators, targets, managers and resources established for fulfilling the objectives.

This year, the Sustainability Report is also being elaborated, which also contains the part of innovation and competences for the environment.

Both in the 2022 Management Program and in the Sustainability Report, a program to reduce the amount of waste generated was developed and implemented.

This reduction of waste quantities is achieved by:

- ✓ Improving technological processes to minimize the quantity of resulting waste
- ✓ increase the quality of products to reduce the amount of non-compliant product

- ✓ reducing the quantity of paper used by encouraging electronic communication between sectors, using drafts, printing only if necessary, reducing fonts, etc.
- ✓ ensuring the selective collection of waste generated by type
- ✓ temporary storage in specially arranged spaces
- ✓ valorification and elimination through authorized companies
- ✓ keeping a strict record of the generated waste
- ✓ periodicaly deliver recoverable waste to authorized companies, in order to not create stocks that could endanger human health and safety and would harm the environment
- ✓ detailed control of the purchased products, in order to reduce the inputs of raw materials/non-compliant materials.
- ✓ Other

2. MAIN LEGISLATIVE PROVISIONS

The main legal provisions underlying the preparation of this program are:

- ✓ GEO 92/2021 on the waste regime;
- ✓ Law 249/2015 on the management of packaging and packaging waste, with subsequent amendments and completions;
- ✓ GD 856/2002 with the amendments in force, regarding the waste management records and for the approval of the list containing waste, including hazardous waste
- ✓ Order 794/2012 on the procedure for reporting data on packaging and packaging waste
- ✓ GD no. 1061/2008 regarding the transport of hazardous and non-hazardous waste on the Romanian territory ⎪ GEO 2/2021 on waste storage
- ✓ GEO 6/2021 on reducing the impact of certain plastic products on the environment
- ✓ Directive 2008/98 / EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives
- ✓ Commission Decision 2014/955/EU of 18 December 2014 amending Decision 2000/532/EC establishing a list of wastes under Directive 2008/98/EC of the European Parliament and of the Council
- ✓ GD 788/2007 on the establishment of measures for the application of Regulation 1013/2006 on the transfer of waste

According to GEO 92/2021, waste is defined as: any substance or object that the owner throws away or has the intention or obligation to throw it away; the same law defines the waste holder: - the waste producer or the natural or legal person in their possession;

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3. TYPES OF WASTE GENERATED BY ROMCARBON S.A.

S.C ROMCARBON S.A. was founded in 1952 in Buzau, initially under the name of Chimica and having as object of activity garments and fabrics of bakelite and aminoplasts.

The initial activity was much diversified by the implementation of new technologies:

- manufacture of activated carbon and respiratory protection materials;
- processing of plastics such as: polyethylene, PVC, PSE, polypropylene;
- manufacture of filters for automobiles, locomotives and other industrial fields;
- plastics recycling

For nearly 70 years, S.C. ROMCARBON S.A. is a very important player in the field of plastics on the market in Southeast Europe. The company obtains products made of polyethylene, polypropylene, polystyrene, polyvinyl chloride.

ROMCARBON S.A. operates in the green industry. Being aware of the impact that waste has on the environment, but also because we want to support Romania in fulfilling the objectives of recovery and recycling of packaging waste, ROMCARBON S.A. emphasizes selective collection and recovery, especially through recycling, but also through other recovery methods

As its own activity, in 2012, Romcarbon opened a new development direction in the field of plastics recycling and the production of virgin and recycled compounds. We have developed and perfected the process of transforming the waste of polyethylene, polypropylene, polystyrene, PVC, ABS, etc., taken from collectors or primary users, into regular raw materials.

Since 2021 we have the EUCERTPLAST certification which is based on the European standard EN 15343: 2007 and offers the company's suppliers and customers the assurance that pre- and post-consumer plastics processed by Romcarbon are treated according to best practices and with respect for the environment.

Obtaining by ROMCARBON S.A. EuCertPlast certification enables the company to comply with the requirements of the REACH Directive and contributes to the application of best practices on the traceability of recycled plastics (throughout the recycling process and the supply chain) and on the quality of the recycled content in the final product.

Waste management is an important topic for our company. This process has reached a high level of maturity and is regulated internally by a procedure that provides clear responsibilities for each sector of activity for the collection, sorting, selection, registration and reporting of waste generated in ROMCARBON in its capacity to:

- Waste generator from production activity - technological waste, packaging waste, waste resulting from: water use, forklift use, equipment maintenance, etc.
- Importer of packaged products, the respective packaging becomes waste
- Manufacturer of plastic packaging in Romania that will become waste
- Manufacturer of products that will become partially or completely waste: (car / industrial filters, individual respiratory protection equipment)

Our organization has defined and implemented mechanisms to ensure waste reduction, waste traceability at all stages, as well as proper reporting to the authorities.

In addition to the educational programs we have for our employees, we are constantly raising our customers' awareness of waste separation by marking special waste recycling codes on each of our products.

In recent years S.C. ROMCARBON S.A. has placed a strong emphasis on investing in the green economy, becoming one of the largest recyclers of plastic waste in Southeast Europe.

Due to the great diversity of activities carried out within the company, the generation of waste is also diverse, resulting mainly in non-hazardous but also hazardous waste (eg. laboratory reagents). As a percentage of waste generation, the largest amount of waste generated is technological waste, which is reintroduced into the technological flow or recycled to the "Compounds" section.

4. WASTE MANAGEMENT.

The general principles underlying waste management are:

- The principle of using exclusively those waste management activities that do not harm health and the environment,
- The principle of protection of primary resources
- The principle of prevention The principle of preliminary measures
- The polluter pays principle correlates with the principle of the responsibility of the producer and that of the responsibility of the user;
- The principle of proximity, which requires that waste be recovered and disposed of as close as possible to the place of generation;
- The principle of using the best available techniques, without incurring excessive costs;
- The principles of non-discrimination, consent and permission to transport hazardous waste only in those countries that have adequate disposal technologies that must be observed in international trade in waste.
- The principle of integration that establishes that waste management activities are an integral part of the socio-economic activities that generate them.

It is forbidden to abandon, dispose of or dispose of waste in an uncontrolled manner. Selective collection is a waste management process by which materials with a potential for recycling (paper, cardboard, plastic, metal, oil, fuel, thinners) are recovered and directed to be recycled, or recovered by various methods.

Each type of waste according to the list of records is stored separately, starting from its place of production to storage at the organization level, in baskets/bins/containers/bags/bags, identified by labels with the type of waste for which it is intended.

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Hazardous waste is identified and recorded at each place of production, unloading or storage. Romcarbon selectively collects the waste generated, especially due to the responsibility of the workers, due to the implemented programs, the special investments made regarding the selective collection since the waste generation.

After the selective collection from the point of generation, the waste is deodorized in specially arranged places, and prepared for a later capitalization, by companies authorized in this respect. Plastic waste generated by all sections of ROMCARBON S.A. are collected separately and capitalized by recycling within the company, at the COMPOUNDS section.

Waste generated within SC ROMCARBON SA:

- paper/cardboard waste (wrapping paper/cardboard, bags, waste paper, newspapers, etc.)
- ferrous scrap (waste, scrap metal, carcasses, waste from processing and repair, etc.) including those from dismantling.
- non-ferrous waste (waste from processing and repair, span, etc.).
- recoverable polypropylene waste
- recoverable polyethylene waste
- waste from polyethylene recoverable PVC
- waste technological/recoverable
- waste from expanded polystyrene wood waste impure
- wood waste
- waste from impure plastic materials,
- textile waste
- paint waste, sludge and filter cakes contaminated with hazardous substances
- transmission oils / mineral / hydraulic / lubricating / emulsions / Vaseline / degreasing mixture / solvent based inks
- hazardous reagent / additive
- waste metal / plastic packaging waste containing hazardous substances (inks, adhesives, acids, etc.)
- waste electrical / electronic equipment / light bulbs / neon tubes used batteries / accumulators
- household waste

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5. MEASURES TO MINIMIZE THE QUANTITY OF GENERATED WASTE

Strategic Objective Level I	Operational Objectives Level II	Planned activities	Responsibilities

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Objective: Improving environmental performance **Term: 31.12.2022**	**Specific objective:** Efficient use of raw materials, other materials **Indicator:** reduction of the amount of technological waste generated/total Amount of production obtained (measured in tons) **Target: 2%**	Framing in the specific consumption of raw materials by: • compliance with manufactured recipes and technology • compliance with the maintenance plan of the equipment and installations • compliance with the metrological verification plan • rigorous monitoring of waste quantities • checking the supplied raw materials, including the accompanying documents Optimization of production planning to eliminate interruptions / stops in the case of work equipment with continuous flow (extrusion) Sorting products declared non-compliant and using them for other destinations Training and awareness of all staff on compliance with recipes and technological processes, proper monitoring of equipment, reduction of non-compliant product quantities	Production Sector Environment responsible person
Objective: Improving environmental performance **Term: 31.12.2022**	**Specific objective:** Promoting an awareness and motivation information system for all employees **Indicator**: Degree of compliance with the legal requirements applicable to the assessment of compliance with the legal requirements on the environment **Target: 100%**	• Training and awareness of all staff on proper waste management. • Evaluation of training	Production Sector Environment responsible person
		• Adherence to the measurement and environmental monitoring program • Identification of applicable legal requirements • Ensuring compliance with legal requirements • Achieving compliance with legal requirements • Establishing, implementing and implementing measures necessary to comply with legal requirements • Reporting to the authorities according to legal requirements	Environment responsible person

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Objective: Improving environmental performance **Term: 31.12.2022**	**Specific objective:** Recovery of as much waste as possible from the total amount of waste generated **Indicator:** Increasing the amount of waste recovered from the total amount of waste generated **Target: 2%**	• Selective waste collection • Establishment of areas intended for temporary storage of waste • Training and monitoring of operators to ensure selective collection • Identification and selection of suppliers who collect waste for recycling • Identification and selection of suppliers that can use waste for energy recovery	The whole organization Production Sale Sector Logistics