

Environmental Statement 2007

(ORIGINAL EN ROJO)

BUREAU VERITAS CERTIFICATION
C/ Francisco Delgado, 11
Parq. Emp. Arroyo de la Vega
28108 Alcobendas (Madrid)

Declaración Medioambiental
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(CE) 761/2001
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This document represents the Environmental Statement of Befesa Escorias Salinas, S.A. for 2007. It has been drawn up in accordance with the requirements established under the ISO14001:2004 Environmental Management regulations and the 761/2001 Regulation of the European Union Eco-management and Eco-auditing.

This is a public document validated by Bureau Veritas Certification, S.A.U., an environmental controller with accreditation number E-V-0003 (ENAC) with premises at 11, Francisca Delgado, Parque Empresarial Arroyo de la Vega- 28108- Alcobendas (Madrid).

This Environmental Statement is valid for 12 months, the following validation to date from May 2009.

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1. Description of registry of the organisation in EMAS.

1.1 European Union Regulation N 761/2001

Regulation 761/2001 (repealing the previous Regulation 1836/93) or Eco-Audit known by the English initials EMAS (Environmental Management Audit Scheme) is a system by which permission is given for organizations to join of their own accord a community system of environmental management audits.

This regulation has three fundamental commitments:

- Internal control of the environmental impact of the operations and its corresponding registration under basic expected requirements relating to the fulfilment of applicable environmental legislation.
- Continuous reduction of these impacts, with the definition and publication of the objectives and actions for achieving this, as well as the control and results through continuous environmental audits.
- Commitment to total transparency regarding society and other bodies.

1.2 Environmental statement

This is the essential element of the system as it supposes putting the company's environmental data at the disposal of society:

- Consumption of raw materials, water, electricity, fuel, emissions, effluent, etc.
- The company's environmental policy, ensuring compliance with applicable regulations together with the commitment to continuous improvement based on quantifiable targets.
- Validation of the system's auditing along with compliance with the Regulation through an authorised controller.

In short, to inform society of our activity, provide key information and ensure that our company respects the environment.

1.3 Adhesion of Befesa Escorias Salinas, S.A. to the system

Befesa Escorias Salinas S.A. carries out its activities with respect for the environment.

From the time the industrial wastes arrive, followed by the processes of storing and treatment, care is taken to minimize the possible environmental effects or impact our company might produce. This has led Befesa Escorias Salinas S.A. to adhere to Regulation 761/2001, despite the voluntary nature of the latter.

In adopting the Regulation, there is an improved knowledge of the centre's different activities, which makes possible a better control and the minimizing of the potential environmental effects created.

The Regulation is a good tool for showing society the various commitments undertaken by Befesa Escorias Salinas S.A. in the area of the environment.

2. Location and site

Befesa Escorias Salinas, S.A. is situated within the municipal area of Valladolid. More specifically, it is 5 kilometres from the city centre of Valladolid and occupies approximately 29,100 m² of the former land used by Endasa. The nearest populated areas to the installations of Befesa Escorias Salinas, S.A. are the San Pedro Regalado neighbourhood, belonging to the municipality of Valladolid, at a distance of 1,400 metres, and the village of Santovenia de Pisuerga, 1,900 metres away.



3. Description of operations

The main activity of Befesa Escorias Salinas is the production of aluminium concentrates, aluminium oxides and crystallised salts, out of wastes from secondary aluminium production (salt slag, aluminium slag and filter fines). Therefore, the industrial activity of Befesa Escorias Salinas, S.A. is the recycling, recovery and valuation of wastes from secondary aluminium fusion. Authorisation is that of Agent for Dangerous (G.R. CL 4/96) and Non-Hazardous Wastes (G.R.N.P. C.L 8/02).

The salt slag recycling process operated by Befesa Escorias Salinas, S.A. permits the recovery of the free metal and the flux salts and the formation of a new product, composed to a large extent of aluminium oxide (Paval®).

The activities of Befesa Escorias Salinas, S.A. represent an important fundamental link in the aluminium life cycle. Aluminium is easily susceptible to air corrosion, and it is always associated with its oxide. For this reason, the metal recycling process is a complicated one and we can say that in fact refining takes place.

Traditionally, the most important process in aluminium recuperation has been metal aluminium fusion (first cycle). Nowadays, the salt slag obtained in this process are also treated. Recycling of the flux (second cycle) employed to fuse the metal completes the recycling process in the refineries. The aluminium oxide which inevitably accompanies the metal is finally recovered (third and last cycle). Thus, total recycling is carried out. The aluminium recycling industry is one which benefits the environment insofar as it values wastes from the primary industry, transformation and consumption with zero disposal.

Salt slag treatment is carried out in specific modern installations due to its recent incorporation in the recovery cycle. The production process involves mechanical crushing, a metals separation stage, dissolution of the salts in water, filtering of the inert material and crystallisation of the salts. In the related process production takes place of an aluminium concentrate, which returns to the metal recycling stage, the flux, which is also re-employed in the fusion, and an aluminium oxide, for diverse applications. This product is known by different names on the market designating various secondary raw materials with an aluminium oxide basis. In Spain we call it Paval®.

The products obtained in the process are the following:

- Salts, a mixture of ClNa and ClK in respective proportions of 70/30, 50/50 or the original proportion, with more than a 99% recovery of the content of salt slag salts, calculated at 52,000 t/year of salts produced for 130,000 t/year of salt slag.
- A highly aluminous concentrate, to which we give the commercial name Paval®, 60 to 70% in purity, with an estimated total of 80,000 t/year, and an average humidity of 20%.
- A 78% pure aluminium concentrate, estimated at 7,000 t for 130,000 t of salt slag.

Below is a description of the processes carried out in each of the previously-mentioned installations.

- Mechanical crushing of the material: the aim of this treatment is, on the one hand, to extract the metal aluminium contained in the salt slag and, on the other, to reduce the particles to an optimum size for ensuring the perfect dissolution of the salts. This dissolution is important, since the non-dissolved chlorides which result from the process and which are in the Paval make this product a contaminant, reducing its use and consequently its value.
- Dissolving, reaction and filtering: in this part of the process first of all water is added to the dust resulting from the crushing in order to dissolve the salts, CINa and ClK. Apart from the salts, in salt slag there are other aluminous compounds which, on contact with water, react by giving off certain gases. To control the emission of such gases, the slurry from the dissolving process goes to reactors until the reacting process is complete. After this, the two existing phases, brine and inert solids, are separated by vacuum filtering.
- Crystallization: evaporation followed by steam condensation permits the separation of the salts from the water. In this way we obtain a mixture of CINa and ClK and certain condensates which are re-employed in the process.
- Drying: the last stage in the process is an optional drying phase in which the salts obtained previously by crystallisation or the Paval can be dried in a rotating dryer formed essentially by a cylindrical trommel which by means of its inclination and a system of revolving blades causes the product inside to move forward and come into contact with the hot gases. Consequently, the material is gradually dried and the humid gases leave the trommel by aspiration with an induced draft fan. In the case of the salts, these can also be dried on a fluidised bed dryer, using the gases from the steam boilers.

The products supplied by Befesa Escorias Salinas, S.A. undergo a quality control and are perfectly identified, ensuring that a complete check can be made on the manufacturing process, the raw materials used and the controls carried out. All of this is thanks to our ISO 9001 certified Quality Management System in operation since 2003.

Furthermore, in concordance with its activities aimed at preserving natural resources and protecting the environment, we consider it necessary to conduct our operations with the least possible impact on the local environment. Aware of this need, in the year 2000 we decided to implement an Environmental Management System with ISO 14001 certification.

Within the framework of current legislation, Befesa Escorias Salinas, S.A. has complied with all the commitments undertaken for 2007, of which the following are significant:

- Periodic notification of contaminants to the PRTR register.
- Integrated Environmental Authorisation: the required application documents were presented in September 2006 and additional documentation requested by administration was presented in January 2007. In July 2007 the project was made public and during this period the project met with no claims. At the time of drawing up this report, Befesa Escorias Salinas has notification that its application is with the commission of the Valladolid Territorial Delegation of the Castile and Leon Regional Government (Decree 8/2008 of January 31, regulating the procedure of Renewal of Integrated Environmental Authorisation).

- The corresponding Administrations have been sent the report that has been prepared on hazardous merchandise, the Representative's Annual Statements, and the analyses regarding atmospheric emissions, waste water and cooling towers.
- In addition, the legal requirements laid down in the Law of Labour Risk Prevention and Royal Decrees relating to safety in the workplace, industrial hygiene and ergonomics have been met.

4. Integrated quality and environment management system

Our Management System is mainly composed of:

- An integrated Quality and Environment Labour Risk Prevention policy: this formally describes the directives and commitments adopted by Befesa Escorias Salinas, S.A., and is periodically revised in accordance with the changes undergone by the company, legislation, interested parties, etc. The Policy was last revised and modified during 2007.
- A Management Programme containing the necessary activities to be undertaken for the aims to be met.

Management System documentation consisting of:

- A Quality and Environment Integrated management Manual: this describes the responsibilities of the company along with the monitoring of activities and everything causing or likely to cause environmental effects.
- Management Procedures: these describe the development of the activities referred to in the Integrated Management Manual.
- Instructions and registers.
- Internal audits, as Management tools for assessing the development and effectiveness of the Environmental Management System implemented and identifying opportunities for improvement.
- Annual revision of the System by Management to assess implementation and effectiveness and establish fresh targets for continuously improving environmental protection.
- Assessment of environmental aspects.
- Registration of legislation and legal requisites applicable.

There are three main aims:

- The commitment to comply with the legal requirements and any others applicable to this installation.
- To carry out our recycling operations in an environmentally-friendly way, paying particular attention to activities and products which might prove hazardous for the environment.
- Continuous improvement from an environmental point of view.

These are part of the conditions laid down in our management policy.

Quality and environment Labour Risk Prevention integrated policy

As a leader in Salt Slag recuperation, Befesa Escorias Salinas S.A. acknowledges its responsibility and important role in promoting the quality of its products and processes, defence of the environment, safety for its workers and sustainable development.

The Management of Befesa Escorias Salinas S.A. is aware that the key to its successful operations is total satisfaction of its end customers, and we include here the recipients of our goods and services, our social environment and, of course, all the workers, both direct and indirect.

In accordance with this philosophy, we have also adopted the following commitments:

- To be in possession of the best technology available and the proper resources for the manufacturing process, ones which guarantee compliance with the legal and regulatory requirements, the safety of its workers, avoiding pollution, and observing the specific demands of the client, which means the quality expected of our products.
- To adopt a policy of continuous improvement so that we obtain the products we are aiming for by proven and reliable techniques, as well as the knowledge, control and reduction of environmental impacts, and the reduction, control and elimination of risks. For this purpose, we have established quantifiable annual targets in terms of quality, safety and environment, to be periodically reviewed and assessed by the Managing Director of Befesa Escorias Salinas S.A.
- To actively involve all company employees in improving our products and processes, reducing our environmental impact, and reducing, controlling and eliminating risks by means of a suitable internal communication system.
- To establish the bases for a programme of training, research and avoidance of defects and incidents by means of systematic planned strategies.
- To establish and maintain an integrated management system covering the areas of quality, safety and environment, to be reviewed and audited in line with acknowledged international regulations.

The General Management of Befesa Escorias Salinas S.A. will, by an appropriate training and communication plan, make sure that this policy is understood and accepted by all of its own and its outsourced workers. This policy will be available on demand to any interested party.

The General Manager of Befesa Escorias Salinas S.A. is responsible for upholding and interpreting this policy.

Carlos Ruiz de Veye
General Manager of Befesa Escorias Salinas S.A.
Valladolid, 19 September 2007.

In accordance with the requirements of the internationally recognised ISO regulation 14001:2004, the General Manager of Befesa Escorias Salinas S.A. has nominated the following person to deal with the application and maintaining of the Environmental Management System established:

- Inmaculada Paños Casteleiro, Quality, Labour Risk Prevention and Environment Manager, as the Management delegate to set up, implement and run the Management System, and at the same time guarantee compliance with all corresponding environmental requisites.

It should be noted that currently a policy of integrated management is being carried out for Quality, Prevention and Environment Systems. The aim is to make joint progress in the three areas, simplifying effort whilst at the same time ensuring the rigorous and serious approach characteristic of each so that the wellbeing of our future generations is not jeopardised.

5. Significant environmental aspects of the Company

Here we have selected each element of operations in Befesa Escorias Salinas which might interact with the environment. Identification of the aspects refers to those which may have negative or positive consequences for the environment.

The following list is a reference to the above-mentioned aspects:

- Waste waters.
- Atmospheric emissions.
- Production of wastes similar to urban types.
- Production of hazardous wastes.
- Consumption of natural resources.
- Accidents.
- Emergency situations.
- Others.

For each of the aspects identified a determination is made of the changes that they may bring about for the environment (environmental impacts).

The methodology used to make this evaluation has undergone important changes in order to enhance objectivity.

Under normal conditions environmental aspects are assessed on the basis of the following three environmental parameters: amount, duration and risk.

- **Amount:** weight, volume, concentration or extent of the environmental aspect.
- **Duration:** permanence or real duration in time of the environmental aspect.
- **Risk:** property by which a substance and/or a waste product may be characterised, or how this aspect might have a negative effect or repercussion, increasing in significance the nearer it gets to the legal limits or applicable reference points.

Under abnormal or emergency conditions, an evaluation is made with the following environmental bases: probability and environmental incidence.

- **Probability:** the possibility that the event will take place on the basis of previous cases of emergency situations.
- **Environmental incidence:** the intensity of the impact on the environment as a consequence of an accident or emergency situation associated with the means of protection in the installations.

Once we have applied the above systematisation to all the environmental aspects identified and the final results have been obtained, we will consider significant aspects both in normal as well as in abnormal and emergency situations all those with a score of 6 or more. If there are fewer than 3 aspects with a lower score, the 3 highest will be deemed significant.

Environmental aspects	Classification of the aspect	Environmental impact
Use of water	Significant	Reduction of natural resources
Use of natural gas	Significant	Reduction of natural resources
Use of diesel oil	Significant	Reduction of natural resources
Use of electrical energy	Significant	Reduction of natural resources
Treatment of slag, SALT slag and Filter Fines (Positive impact)	Significant	Elimination of hazardous wastes
Generation of hazardous wastes	Significant	Depending on the final destination - land use - recycling
Disposal of sanitation water	Significant	Contamination of continental waters
Use of NaOH	Significant	Reduction of natural resources
Use of flocculant	Not significant	Use of chemical products
Use of antifoam	Not significant	Use of chemical products
Noise emission	Significant	Acoustic contamination
Contaminating gas emissions	Not significant	Atmospheric contamination
Use of diesel oil	Not significant	Reduction of natural resources
Use of biocides, algicides and biodispersants in the cooling towers	Not significant	Use of chemical products

List for 2007.

The approach applied above will also be applied for indirect environmental aspects, that is, those in which the company does not have full management control.

Indirect environmental aspects	Effect on the environment		
	Low	Medium	High
	1	2	4
Transport of goods	Use of electrical means of transport (train)	Use of means of transport over 25t	Means of transport under 25t
Use of Salt by clients	In processes as a substitute for natural resources	In processes mixed with natural resources	Not replacing natural resources
Use of Paval by clients	In processes as a substitute for natural resources	In processes mixed with natural resources	Not replacing natural resources
Use of Aluminium by clients	In processes as a substitute for natural resources	In processes mixed with natural resources	Not replacing natural resources
Control of outsourcers	Acceptance and control of compliance with internal requirements	Acceptance and partial control of compliance with internal requirements	Acceptance and non-compliance with internal requirements

5.1 Water consumption

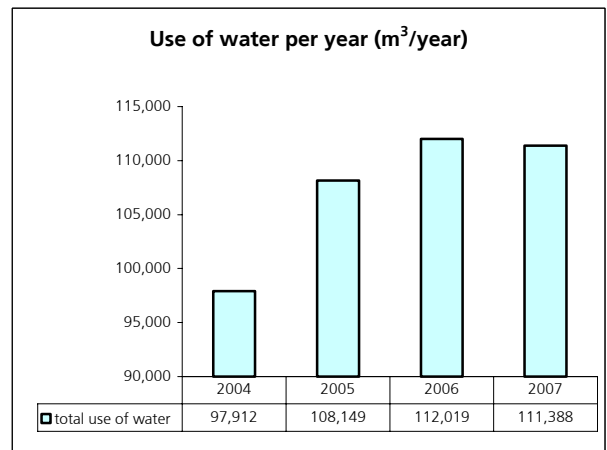
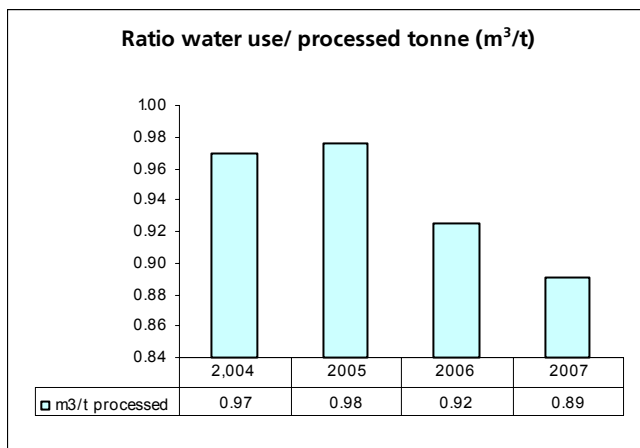
Water forms a fundamental part of the process in Befesa Escorias Salinas, S.A., as it is necessary for dissolving the salts in the salt slag. Therefore, the consumption of water is proportional to that of raw materials. The water employed in salt dissolution is evaporated, in order to obtain ClNa and ClK by crystallisation, and later re-condensed for use in new productive processes.

All the condensates from the evaporation stage are sent to the storage tanks, from which water is fed to the different points of consumption:

- Boilers for producing steam.
- Washing of oxides and/or dissolving of salts.
- Pump seals and cleaning of pipes and plant. After being used in the seals, this water is also sent to the salt dissolving stage.

The process has been designed to reduce as far as possible the use of water from the elimination process, maximising performance and recycling the waters generated in this process and those of rainwater. Fresh water is used only to make up for water loss for the water content in the salts and Paval®.

This fresh water comes from an underground deposit for which Befesa Escorias Salinas, S.A. has the necessary administrative authorisation. Befesa Escorias Salinas, S.A. carries out no pre-treatment of the waters it receives.



Record of water use in the treatment process (average annual use from January 2007 to December 2007, inclusive).

5.2 Energy consumption

The main fuel of Befesa Escorias Salinas, S.A. is natural gas, which is employed in the steam boilers and the Paval® dryer.

Electrical energy is used to feed the engines of the pumps, mills, conveyor belts, fans, etc., as well as to control the whole installation.

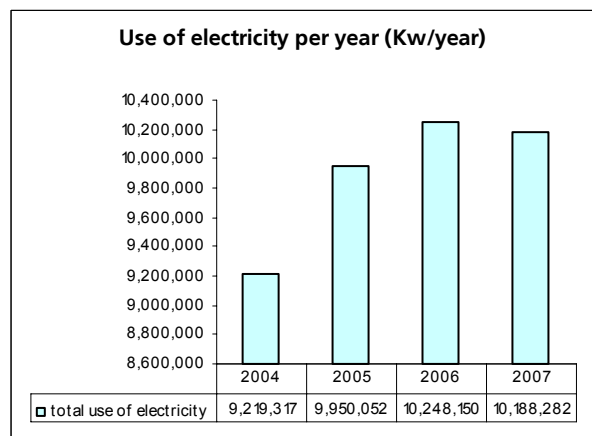
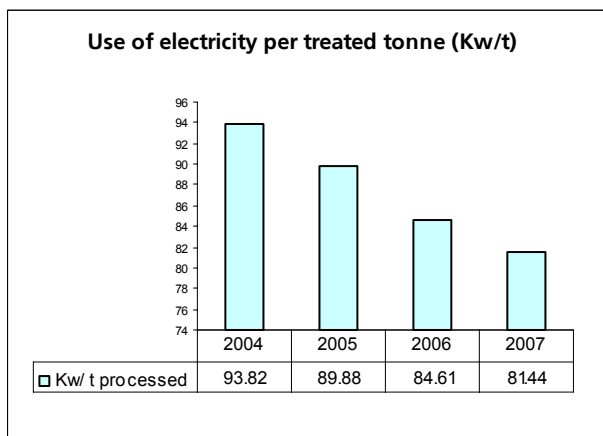
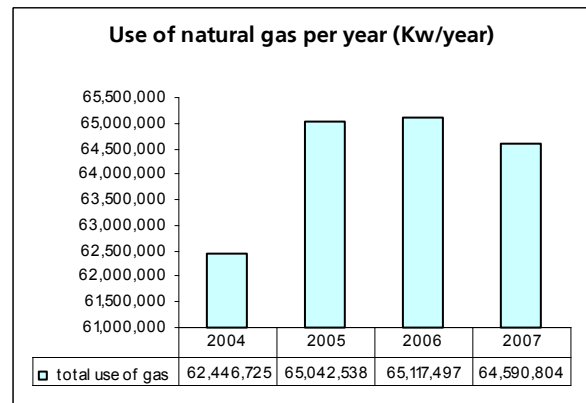
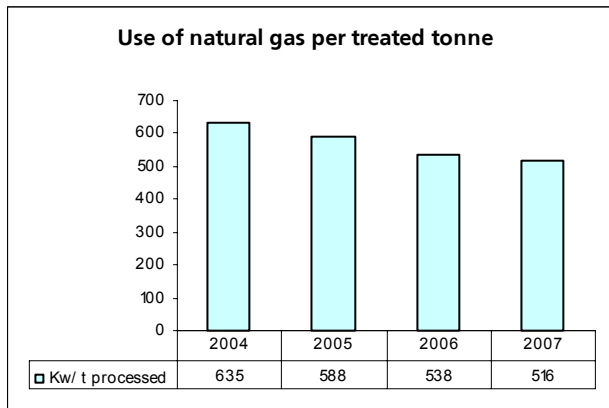
Diesel oil is not used in production but only for internal means of transport (load buckets and lift trucks).

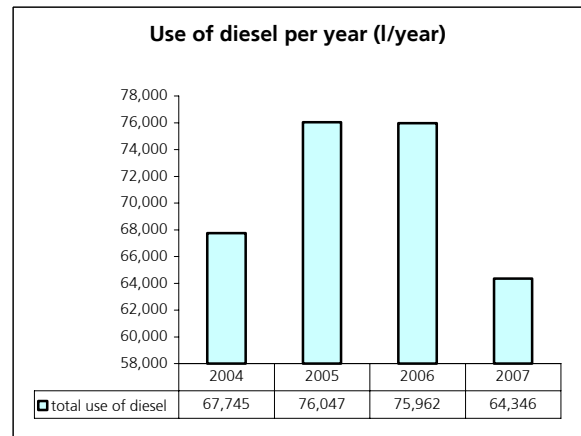
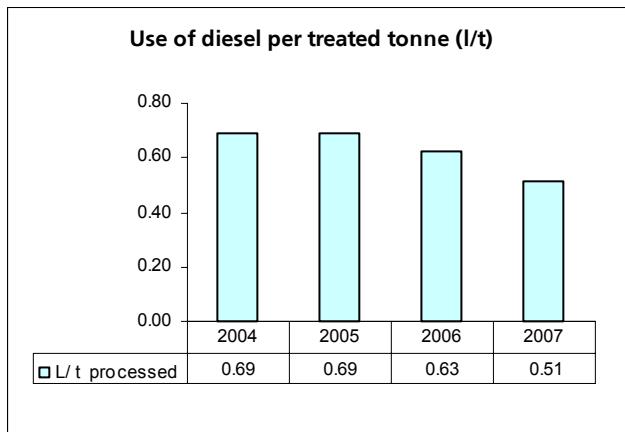
The aim of Befesa Escorias Salinas is always to reduce its energy consumption. In this last few years it has managed to gradually reduce all of its costs through improved management of its equipment and reorganising its processes.

In the installations of Befesa Escorias Salinas, S.A. there is a nitrogen tank which is the property of the supplier. The nitrogen is used in operations involving making the reactors inert and maintaining the seal of the flare. The storage tank is situated in a fenced-off external area and had a total consumption last year of 0.25 m³/t treated.

The diesel oil and nitrogen storage systems comply with the conditions laid down in the Royal Decree 1523/1999 of October 1, regarding MI-IP 03 on storing installations for consumption in the same installation.

Below we can see the average annual energy consumption (from January to December, inclusive) during the last four years:





Records of energy consumption in the treatment process (mean annual consumption from January of the year of reference through to December, inclusive).

5.3 Raw materials

The raw materials used in Befesa Escorias Salinas, S.A. are considered dangerous wastes from the aluminium metallurgy process called secondary fusion.

In Befesa Escorias Salinas we consider their consumption and treatment to have a positive environmental impact, insofar as our process avoids dumping whilst managing to reuse our products produced due to the treatment of the raw materials, thereby reducing the consumption of natural resources in the aluminium industry.

They can be classified depending on their origin in three groups:

- Salt slag: these come directly from the rotating furnace and are the mix of the flux employed to retain the impurities in the aluminium slag.
- Aluminium slag: these come from fusion furnaces and are the result of clearing with non-cooled slag. Due to their low metallic content, they are unsuitable for fusion in rotating furnaces, and for this reason they undergo a process of milling, in which the metal content is increased; the dust resulting from the milling is the waste we treat in Befesa Escorias Salinas.
- Filter fines: these come from gas purification in the rotating furnaces. They have a very low metal and a high salt content. The typical composition of these materials are shown in the table below:

	Salt slag	Aluminium slag	Filter fines
European Waste List Code	100,308	100,321	100,323
Metal aluminium (%)	4-6	15-20	Traces
Al₂O₃ (%)	45-55	70-75	40
ClNa + ClK (%)	40-55	10	60
Others (%)	1	-	-

Typical compositions of raw materials treated in Befesa Escorias Salinas, S.A.

The annual use (January to December, inclusive) of these raw materials over the last four years was as follows:

Year	Total treated raw material	Total treated salt slag	Total treated aluminium slag	Total treated filter fines
2004	101,037	98,269	2,115	652
2005	119,655	110,701	7,343	1,610
2006	130,154	121,120	7,306	1,727
2007	135,848	125,107	9,142	1,598

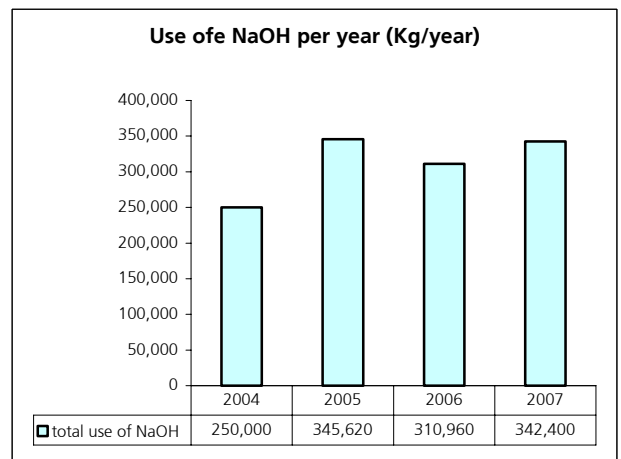
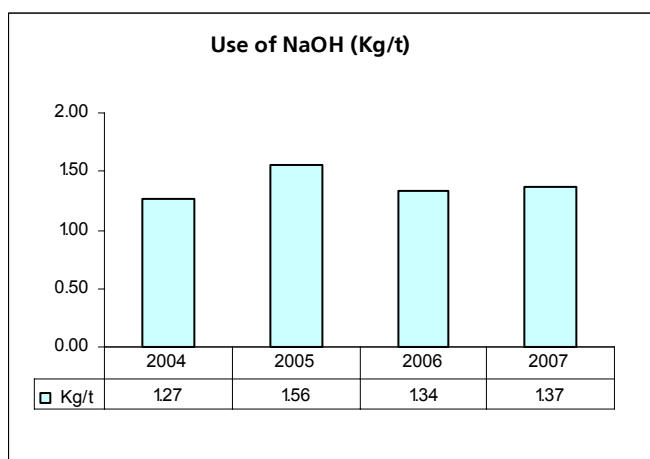
Amount of raw material processed by Befesa Escorias Salinas, S.A, from January to December in the last four years.

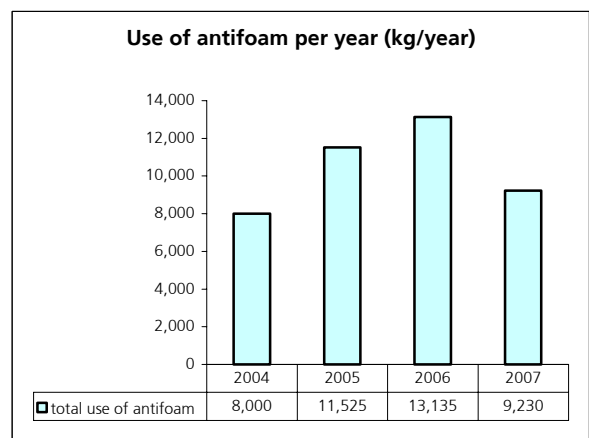
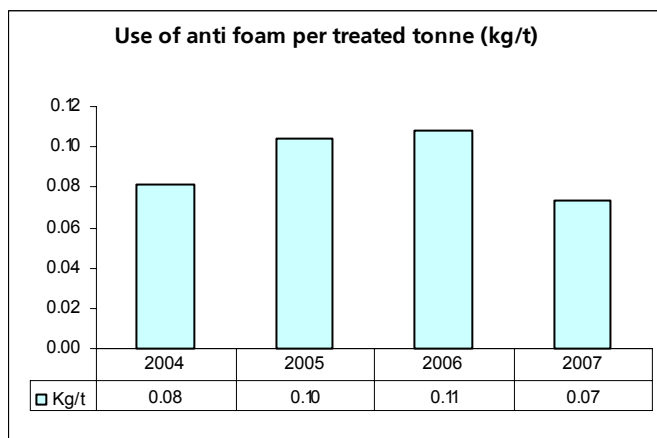
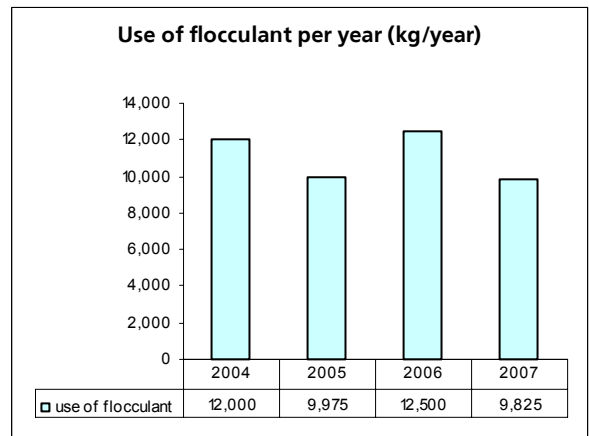
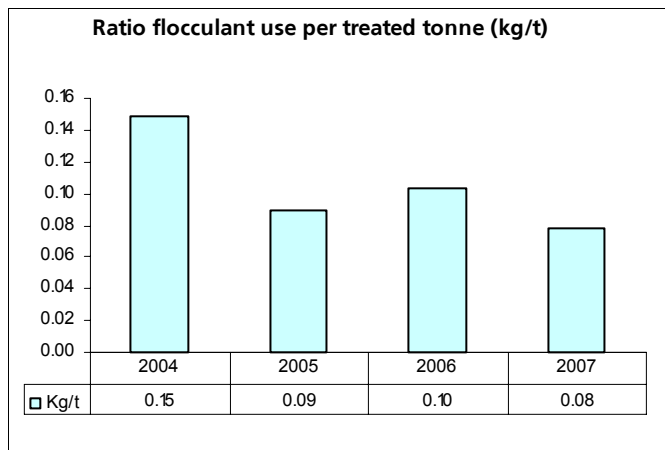
5.4 Use of additives

Besides the above-mentioned raw materials, Befesa Escorias Salinas, S.A. uses the following chemical products as additives:

- NaOH: this is employed in order to maintain a basic pH in the brine, reducing the point of co-crystallisation of the aluminium oxide.
- Flocculant: this is used in the reacting-decanting process to facilitate separation of the solid-liquid inter-phase.
- Salt antifoam: this is employed in the salt crystallisation process to reduce the formation of foams.

Average annual consumption (January to December, inclusive) over the last four years is given below:





Record of additive use (mean annual consumption from January to December, inclusive).

5.5 Generation of significant amounts of hazardous waste

The most important wastes created in the plant of Befesa Escorias Salinas, S.A. in terms of the total amount generated, are the big-bags used for transporting the filter fines and the aluminium slag which we receive as raw material as well as wastes produced in milling and plant modifications, in this case scrap which is totally recyclable.

The amounts of wastes generated are directly associated with the company's production process, as a result of which the total yearly amount depends directly on how much of this particular material is treated. Befesa Escorias Salinas does not have the capacity at this moment to reduce its creation of these two wastes, as both are the product of the raw materials received.

The amounts generated by Befesa Escorias Salinas between January and December, inclusive, during the last three years are as follows:

Type of waste	European Waste List Code	Amount generated 2005	Amount generated 2006	Amount generated 2007
Empty sacks (big-bags)	150,110	51,320 kg	20,540 kg	25,390 kg
Scrap	160,117	1,265 t	2,096 t	1,471 t

Yearly amounts of significant wastes generated between January and December, inclusive.

5.6 Indirect environmental aspects

In accordance with the above-mentioned parameters, these are classified as:

Indirect environmental aspects	Classification of the aspect	Environmental impact
Transportation of goods	Not significant	Reduction of natural resources Atmospheric contamination
Use of salt by clients (Positive impact)	Not significant	Replaces the use of natural resources
Use of Paval by clients	Not significant	Replaces the use of natural resources
Use of Aluminium by clients	Not significant	Replaces the use of natural resources
Control over outsourcers	Not significant	Generation of wastes on site

6. Atmospheric emissions

Nowadays the plant has six pollution points associated with and under the authorisation of the main production installations:

- Point No. 1: boiler.
- Point No. 2: boiler.
- Point No. 3: extraction belt filters.
- Point No. 4: flare pipe.
- Point No. 5: extraction of crushing plant bag filter.
- Point No. 6: extraction rotating dryer bag filter.

Emissions from the boiler are exclusively composed of gases resulting from natural gas combustion.

In the third point, the vacuum belt filters, the steam from the washcake of the aluminium oxide (Paval®) is eliminated.

The gases produced in the reactors are burnt in the fourth point.

In the final two cases, the emissions of solid particles are controlled by an aspiration system at all points where powder might appear and by the treatment of the particles aspired in a bag filter, thereby achieving an atmospheric emission rate below 5 mg/Nm³, considerably lower than the 150 mg/Nm³ permitted by legislation.

Emissions are controlled every three months by an authorised monitoring body and the data is sent to the environmental authorities of the Autonomous Community.

6.1 Atmospheric impact

Every three months an officially certified laboratory collects samples of the emissions from each of the contamination points, analysing the components indicated in each case by the hazardous wastes management authority. Information is provided on the following contaminants: opacity, chlorides, NH₃, SH₂, COVs, CO, SO₂ and NO_x.

All of the inspection chimneys comply with the Order of 18 October 1976 on contamination prevention and correction. The installation, layout and size of the connections and accesses are suitable for measuring and sampling. All the results from the last inspection are within current legal requirements.

Parameter assessed	2005	2006	2007	Units	Applicable legislation	Maximum value
CO	<48	<48	<60	ppm	Section 27 del annex IV of D833/75	500
Daily maximum value CO	<50	48	457			
SO₂	<140	<140	<160	mg/m ³ N	Section 27 of annex IV of D833/75	4,300
Daily maximum value SO₂	142	140	140			
NO_x	95.5	87.6	<100	ppm	Section 27 of annex IV of D833/75	300
Daily maximum value NO_x	203	100	84.33			
Opacity	<1	<1	<1	Bacharach	Section 27 of annex IV of D833/75	2
Daily maximum value opacity	<1	<1	<1			

Average annual results (January to December, inclusive, of the year in question) of the inspection for point No. 1: boiler. The "maximum daily value" is the maximum value obtained in each year of reference.

Parameter assessed	2005	2006	2007	Units	Applicable legislation	Maximum value
CO	<50	<48	<48	ppm	Section 27 of annex IV of D833/75	500
Daily maximum value CO	<50	48	130			
SO₂	<140	<140	<140	mg/m ³ N	Section 27 of annex IV of D833/75	4,300
Daily maximum value SO₂	<143	140	<140			
NO_x	75	83	<100	ppm	Section 27 of annex IV of D833/75	300
Daily maximum value NO_x	138	100	85			
Opacity	<1	<1	<1	Bacharach	Section 27 of annex IV of D833/75	2
Daily maximum value Opacity	<1	<1	<1			

Average annual results (January to December, inclusive, of the year in question) of the inspection for point No.2: boiler. The "maximum daily value" is the maximum value obtained in each year of reference.

Parameter assessed	2005	2006	2007	Units	Applicable legislation	Maximum value
HCl	<1.6	<1.6	<1,6	mg/m ³ N	Section 27 of annex IV of D833/75	460
Maximum daily value HCl	<1.6	<1.6	<1.6			
NH ₃	163.6	186	228	mg/m ³ N	--	--
Maximum daily value NH ₃	641.1	304	456			

Average annual results (January to December, inclusive, of the year in question) of the inspection for point No.3: extraction belt filters. The "maximum daily value" is the maximum value obtained in each year of reference.

Parameter assessed	2005	2006	2007	Units	Applicable legislation	Maximum value
HCl	<1.6	<1.6	<1.6	mg/m ³ N	Section 27 of annex IV of D833/75	460
Maximum daily value HCl	1.6	33	<1.6			
NH ₃	<38	<38	<0,76	mg/m ³ N	--	--
Maximum daily value NH ₃	7.5	3036	<0.76			
SH ₂	<3.8	<3.8	<3.8	mg/m ³ N	Section 27 of annex IV of D833/75	10
Maximum daily value SH ₂	<3.8	<3.8	<3.8			
Organic Carbon	13,419	14,260	13,395	mg C /m ³ N	--	-
Maximum daily value organic carbon	15,663	15,511	14,688			

Average annual results (January to December, inclusive, of the year in question) of the inspection for point No.4: flare pipe (results prior to the burning of the gases). The "maximum daily value" is the maximum value obtained in each year of reference.

Parameter assessed	2005	2006	2007	Units	Applicable legislation	Maximum value
Particles	5	<5	<20	mg/m ³ N	Section 27 of annex IV of D833/75	150
Maximum daily value particles	5	20	1.5			

Average annual results (January to December, inclusive, of the year in question) of the inspection for contamination point No.5: extraction of crushing plant bag filter. The "maximum daily value" is the maximum value obtained in each year of reference.

Parameter assessed	2005	2006	2007	Units	Applied legislation	Maximum value
Particles	<5	<5	<20	mg/m ³ N	Section 27 of annex IV of D833/75	150
Maximum daily value particles	0.23	<5	<20			
NH3	3.19	<0.76	<0.76	mg/m ³ N	--	
Maximum daily value NH3	8	0.76	0.76			
HCl	<1.6	<1.6	<1.6	mg/m ³ N	Section 27 of annex IV of D833/75	460
Maximum daily value HCl		1.6	3.1			
CO	50	<48	<48	ppm	Section 27 of annex IV of D833/75	500
Maximum daily value CO	50	48	5			
SO2	143	<140	<140	mg/m ³ N	Section 27 of annex IV of D833/75	4,300
Maximum daily value SO2	143	140	0			
NOx	10	<10	<100	ppm	Section 27 of annex IV of D833/75	300
Maximum daily value NOx	10	10	9.6			
Opacity	<1	<1	<1	Bacharach	Section 27 of annex IV of D833/75	2
Maximum daily value opacity	<1	<1	<1			

Average annual results (January to December) of the last inspection for Point No.6: extraction of rotating dryer bag filter. The "maximum daily value" is the maximum value obtained in each year of reference.

6.2 Measures for avoiding, reducing and controlling atmospheric emissions

Befesa Escorias Salinas, S.A. has, thanks to its Integrated Management System, a series of procedures referring to measures for preventing, reducing and controlling atmospheric emissions, as well as action plans in abnormal operation situations due to leaks, breakdowns or any type of possible emergency in the plant:

- Identification, assessment and updating of environmental aspects (PG-01).
- Follow-up and measurement of operations (PGCMA-05).
- Operational control (PGCMA-06).
- Avoidance and Control of environmental emergency situations (PGCMA-04).
- Auto-protection Plan (PG-29).

In addition, the company has undertaken the continuous implementation of measures to reduce the contaminating potential of its emissions. Such measures are shown in the following table:

Measures implemented	Aims	Year
Asphalting the whole of the factory site with PAVAL	To reduce diffuse dust emissions	2001
Incorporation of a new reactor	To ensure reaction and minimise gas immixing	2002
Eliminating gases in the chemical plant	To reduce immixing	2002
Installation of a new flare	To ensure that the gases from the reactors are burned	2002
Installation of a new system for controlling the plant	To standardise and control the process	2003
Installation of a new burner for drying the salts	To reduce emissions and save energy	2004
Installation of a new system for controlling the reactors	To maximise reaction	2005
Using the gases from the boiler to dry the salt	Energy efficiency	2006
Installation of two new reactors	To maximise reaction in order to avoid the emission of gases once the process is over	2007
Installation of a new steam production boiler	To reduce natural gas consumption	2007
Installation of a new system for eliminating dust	To reduce dust emissions	2007

Measures implemented to avoid, reduce and control atmospheric emissions.

6.3 Noise

The noises and vibrations produced are the result of factory activity due to working machinery and lorries.

After exhaustive checking of sound pressure levels inside the plant by means of periodic measurements by our Joint Prevention Service, we can say that the main sources of noise from the Befesa Escorias Salinas, S. A. installations are to be found in the areas of milling and separation of the raw material, both of which are inside the manufacturing plant.

To a lesser extent a source of appreciable noise is the movement of loading and unloading vehicles.

In July 2005 noise emissions were measured by a monitoring body, and it was seen that for both the night shift and day shift the noise levels in Befesa Escorias Salinas, S.A. complied with those established by the legislation. Since that time Befesa Escorias Salinas has revised and checked its noise emissions internally on a

yearly basis. Every three years noise emissions are measured by Monitoring Bodies. The next will be in July 2008.

Date	Point 1	Point 2	Point 3	Point 4	Point 5	Point 6
6/07/2005	53.2	54.3	57.6	56.1	57.0	57.1
15/07/2006	58.2	58.5	52.2	60.5	63.1	59.9
30/08/2007	59.3	57.6	54.8	72.5	64.3	59.8

Results of noise emissions carried out internally.

In point 4 noise emission limits are exceeded due to the proximity of the measurement point to the train lines.

7. Disposal in rivers

Befesa Escorias Salinas, S. A. has no river disposal point as the total amount of industrial waters from the production processes or rainwater are collected at the same point and pumped from here to the process.

Externally, Befesa Escorias Salinas, S.A. has the authorisation of the Duero Hydrographic Confederation to dispose of waste water, once purified, onto the land. This disposal is characterised as "Urban".

7.1 Quality of water

As a consequence of the above authorisation, Befesa Escorias Salinas, S.A. is obliged to make a periodic report, over a maximum period of one year, to the Duero Hydrographic Confederation, of waste water analyses concerning the flow and composition of the effluent. This analysis has to be undertaken by a "collaborating concern", as laid down in article 253 of the Public Water Regulation.

Parameter	2005	2006	2007	Protocol	Maximum value applicable until Dec 07
DBO5	70±23	129±41	122±39	Incubation, 5 days at 20°C (PN/22)	120 mg/l
Solids in suspension	37	91	39.3	Gravimetry (PN/56)	180 mg/l

Average annual results of the quality of waste water.

The results for 2007 were reported during the given period to the DHC; the incidence of DBO₅ limits exceeding those permitted was later redressed by corrective actions in the filtering system. These involved improvements in the installation together with the re-sowing of bacteria for clarification. A new analysis by a certified organisation showed the following figures:

Parameter	04/07/08	Protocol	Maximum value applicable from Dec 07
DBO5	21±6,7	Incubation, 5 days at 20°C (PN/22)	60 mg/l
Solids in suspension	14,3±2,6	Gravimetry (PN/56)	90 mg/l

On 18/12/2007 authorisation from the DHC was renewed regarding the disposal of sanitation water; here the new disposal limits are indicated.

Parameter	Protocol	New limit
DBO5	Incubation, 5 days at 20°C (PN/22)	60 mg/l
Solids in suspension	Gravimetry (PN/56)	90 mg/l

7.2 Measures for avoiding, reducing and controlling waste water disposal

To guarantee good management and continuous improvement, sanitation waters from Befesa Escorias Salinas, S.A. are treated by filtering prior to final disposal. This filtering system comprises the following elements:

- 2 septic tanks.
- Decanter.
- Biological filter.

Besides the latter, the company also previously adopted the following measures:

Measures introduced	Aims	Year
Tank for waste water to be subsequently treated in the plant	To ensure the reuse of waste water and rainwater	2001
Enlargement of the storm tank	To minimise disposal in the case of storms	2004
Improvements in water pipes	To guarantee the total re-employment of rainwater	2006

Measures to prevent, reduce and control waste water disposal.

In addition, Befesa Escorias Salinas, S.A. has introduced a series of procedures reflecting steps taken to prevent, reduce and control disposal. It has also created plans of action in abnormal working circumstances due either to leaks and breakdowns or to any other type of emergency which may arise in the factory:

- Identification, assessment and updating of environmental aspects (PG-01).
- Follow-up and operations measurement (PGCMA-05).
- Operations control (PGCMA-06).
- Avoidance and control of environmental emergency situations (PGCMA-04).
- Auto-protection plan (PG-29).

8. Production of waste (non-significant amounts)

Below is a list of the kinds of hazardous wastes produced, in non-significant amounts, in the Befesa Escorias Salinas S.A. plant:

Type of waste	European Waste List code	Source	Amount generated 2005	Amount generated 2006	Amount generated 2007
Used oil (kg)	130,205	Maintenance	2,000 kg	2,000 kg	2,900 kg
Absorbent material (kg)	150,202	Maintenance	--	50 kg	160 kg
Chemical products past expiry date	180,205	Laboratory	120 kg	100 kg	160 kg
Chemical products containers (kg)	150,110	Maintenance laboratory	-	655	54
Metal containers (kg)	150,110	Maintenance	100 kg	100 kg	380 kg
Used lighting (kg)	200,121	Maintenance	10 kg	-	25 kg

Hazardous wastes generated by Befesa Escorias Salinas, S.A.

The inert industrial wastes produced in the factory are basically those resulting specifically from repairs, reforms or improvements. These and their particular areas are as follows:

Type of waste	European Waste List code	Source	Amount generated 2005	Amount generated 2006	Amount generated 2007
Solid urban wastes (kg)	200,301	Various	31,240 kg	26,590 kg	58,750 kg
Used paper (kg)	191,201	Offices	800 kg	2,570 kg	980 kg
Septic tank slurry (kg)	200,304	Sanitation water treatment	6,600 kg	16,720 kg	32,020 kg

Inert industrial wastes generated by Befesa Escorias Salinas, S.A.

8.1 Measures for avoiding, reducing and controlling waste production

In accordance with ISO certification 14001:2004, within the Quality and Environment General Procedures, PGCMA-14 deals with Waste Management. This procedure clearly details and specifies both hazardous and non-hazardous wastes, their separation and storage, and their transportation to management installations. In addition, ensuing documentary control and the ensuing environmental registration are specified. These are basically:

- Requesting the management organisation to accept the waste.
- Waste acceptance documents by the authorised wastes representative.
- Duly completed control and monitoring documents.
- Copy of the administrative authorisation from the wastes representative.
- Copy of the administrative authorisation from the waste transporter.
- Registration of the waste produced.

The most important measures taken to prevent, reduce and control wastes are:

Measures introduced	Aims	Year
Installation of a press for big-bags	To reduce the size of big-bags	2003
Replacement of the polyelectrolites machine	To ensure its maturation, reducing its consumption and the generation of used bags.	2004
Construction of a waste storehouse	To improve storage and separation	2005

Steps taken to prevent, reduce and control generated wastes.

9. Accident prevention

The company has not only foreseen the abnormal or emergency situations that might arise, but has implemented the necessary preventive measures aimed at reducing the likelihood of these occurring. Such measures are specific for each type of emergency, as can be seen below:

Type of emergency	Preventive measures introduced
Fires	<ul style="list-style-type: none"> • Incorporation of first aid teams and emergency chiefs. • Network of ionic detectors, extinguishers and alarms. • All the factory built of concrete.
Explosions	<ul style="list-style-type: none"> • Incorporation of first aid teams and emergency chiefs with continuous training. • Application of ATEX regulation.
Leaks	<ul style="list-style-type: none"> • Incorporation of first aid teams and emergency chiefs with continuous training.
Losses	<ul style="list-style-type: none"> • Incorporation of first aid teams and emergency chiefs with continuous training. • Emergency equipment with absorbent materials distributed throughout the plant. • Waterproofing of the floors.
Failures in the gas purification systems	<ul style="list-style-type: none"> • Incorporation of first aid teams and emergency chiefs with continuous training. • Periodic inspection of the installations.
Failures in the waste purification systems	<ul style="list-style-type: none"> • Daily auto-control of the proper functioning of the feed pumps. • Water collection tank always empty.

Regarding the mitigation of environmental effects associated with emergency situations, the management of Befesa Escorias Salinas, S.A. will make an assessment, once the emergency period is over, of the situation and decide on the means required to lessen these effects as far as is reasonably possible.

10 Technology employed and comparison with the best possible applications

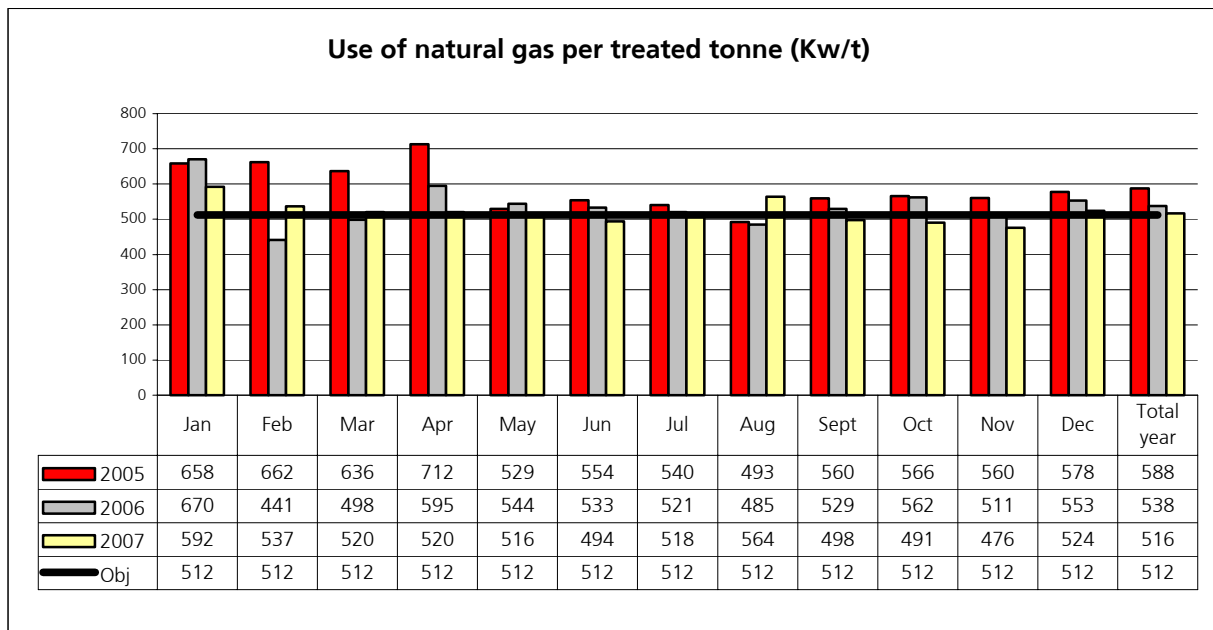
Best possible application	Current situation of the company
Storage	
Covered storage of dangerous wastes for recuperation (salt slag, aluminium slag, filter fines).	Covered areas totally installed for the separate storage of the different types of raw materials.
Process	
Shredding, crushing, milling and sifting to recuperate the aluminium contained in the treated salt slag.	Total installation of the corresponding mills and sieves.
Physical-chemical process to recuperate the salts from the treated salt slag.	Fully installed dissolving tanks, reactors, decanters, crystallisers and dryers.
Collecting and gas elimination systems	
Milling plant: <ul style="list-style-type: none"> • Dust: bag filter Reactors: <ul style="list-style-type: none"> • Gases: extraction of ammonia and burning of combustible gases. Decanters and crystallisers: <ul style="list-style-type: none"> • Gases: steam extraction 	<ul style="list-style-type: none"> • Aspiration and bag filter systems in the raw material loading hoppers (elimination of diffuse emissions). • Elimination of the ammonia from dissolving by washing with water and flare burning of the gases. • Steam extraction by the corresponding elimination to collect all the steam generated during production.
Waste waters	
Collection and use of internal rainwater. Re-employment of waters in the productive process.	Water evaporated during production is re-used by means of refrigeration systems. Internal rainwater is collected by the drainage system and incorporated into the productive process.
Wastes	
Prevention, minimising and reusing the waste generated.	The filter fines produced during milling are incorporated into production. The aluminium concentrates after salt slag milling and sifting treatment are re-employed in new fusion processes of aluminium recycling.
Environmental management	
Implementing and adhesion to a voluntarily accepted international system.	Befesa Escorias Salinas, S.A. has, since the year 2000, been internationally acknowledged by ISO 14001 certification.

11.Environmental aims 2007

Befesa Escorias Salinas S.A. applies on a yearly basis a series of environmental aims defined in the Aims and Targets Plan. The individuals targets are outlined as well as the corresponding quota of human resources and materials. Below is a description of the environmental objectives for 2007, with a brief summary of the extent to which these are already operational:

Objective 1: to maintain gas consumption at levels targeted for 2007.

Compliance indicators: gas consumption/ t of treated salt slag (Objective 512 Kwh/t).

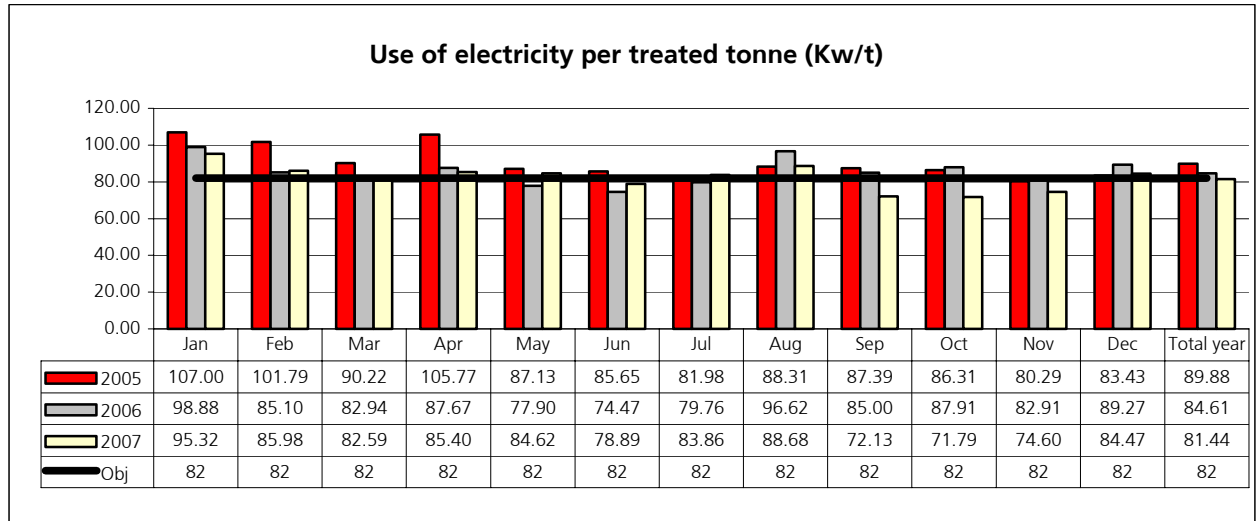


The boilers are revised biannually and the combustion gases are checked quarterly so that, if necessary, extraordinary inspection of the burners can be carried out.

It can be seen that from 2005 to 2007 gas consumption by treated ton decreased by almost 12.5%. From 2005 to 2006 there was an improvement in energy efficiency, as a result of the equipment being thermally insulated as well as improvements in production, aimed at reducing stoppage times and increasing brine density to optimise energy consumption. Between 2006 and 2007 the boiler is replaced; a new one instead of the two used previously is more efficient from the point of view of energy.

Objective 2: to maintain electricity consumption levels according to figures targeted for 2007.

Compliance indicators: electricity consumption/t of treated salt slag (Objective 82 Kw/h/t).



A monthly consumption follow-up was carried out. Consequently, it was possible to take the measurements if the indicator was not in line with the target; in this case, consideration was made of estimated consumption by the manufacturers at the time electrical equipment was purchased. Besides, production equipment has been simplified: the use of pumps and engines has undergone considerable rationalisation and simplification. Improvement in dealing with stoppages and a lighting plan have optimised the use of energy.

Management indicators:

Just as compliance indicators were monitored for each of the processes defined in Befesa Escorias Salinas, in 2007 management indicators were monitored by the integral control panel.

Treatment of salt slag	Total	Aim
Water consumption/t of treated salt slag	0.89	0.87 m ³ /t
Consumption of nitrogen/t of treated salt slag	0.25	0.25 m ³ /t
Consumption of diesel oil/ t of treated salt slag	0.51	0.65 l/t
Consumption of caustic soda/ t of salt produced	1.5	1.25 kg/t
Consumption of flocculant / t of treated salt slag	0.078	0.11 kg/t

The consumption of water by ton of treated salt slag is directly related to brine density. A continuous working system saturates brine dissolution and improves water consumption. Auto-control procedures have been implemented and a water reuse project has been introduced throughout the factory.

As for the use of nitrogen, it has a direct relationship with making the equipment inert. It increases after the Christmas and summer breaks due to the inert reactors.

The diesel oil is related to the number of bucket loaders in the factory.

The caustic soda has crystallised pH and fine crystals present in the brine. Its consumption is more than the planned target, due to processing problems at specific times.

Finally, the development of the flocculant is positive because of the behaviour of the polyelectrolite.

Treatment of aluminium slag	Total	Aim
Cost of treating wastes from used big-bags/t treated slag	413	430 €/t

An attempt is made to employ used big-bags which minimise the weight/volume ratio.

Quality, Prevention and Environment	Total	Aim
Obtaining Integrated Environmental Authorisation	Pending	
Deviations from internal and external audits	12	< 10 /year
Average life of Problem Resolution Reports	40	60 days
Legislative compliance with emissions and water disposal	100	100 %
Open reports on resolution of problems	50	35/year

Management indicators for Labour Risk Prevention, Quality or Environment show almost 100% compliance, as can be observed in the above table. IEA has still to be awarded, since Befesa Escorias Salinas is awaiting the decision of the authority responsible; therefore, at the close of the 2007 indicators, this is pending. More deviations than expected have come from audits, which has positive implications in that it obliges us to seek continuous improvement; our management systems are the object of various types of auditing throughout the year. The average life of the Problem Resolution Reports has increased over the year since the information is cumulative for this period; but even with this consideration we are within the target. Regarding legal compliance with emissions and water disposal, the current legislation is adhered to. Finally, the Reports on-going after a year have increased over the months, as they have appeared in paper format, making their application more accessible to those people without a computer, and also as a consequence of the audits, safety inspections and the monthly Reports meetings; all of this means a higher degree of implementation.

12. Environmental aims 2008

Objective 1: to reduce natural gas consumption by 2% compared with 2007.

Goals		Periods	Areas responsible
1	Monthly follow-up on gas consumption	Monthly	Production manager
Compliance indicator: gas consumption/ t of treated salt slag		Objective 512 Kwh/t	

Objective 2: to reduce water consumption by 5% compared with 2007.

Goals		Periods	Areas responsible
1	Monthly follow-up of water consumption	Monthly	Production manager
2	Installation of crystallisation and dissolution flow-meters	April	Maintenance
3	Rationalisation of water use in the factory	August	Production/projects
Compliance indicator: m ³ / t processed		Objective 0.84 m ³ /t	

Objective 3: to maintain levels of electricity use at targeted figures for 2008.

Goals		Periods	Areas responsible
1	Monthly follow-up of electricity consumption	Monthly	Production manager
2	To detect deviations in consumption and adopt corrective measures	Monthly	Production manager
3	Creation of an energy map	February	Maintenance
4	Optimization of the consumption points in the factory	August	Production manager
Compliance indicator: use of electricity/t of treated salt slag		Objective 82 Kwh/t	

Objective 4: reducing the emission of greenhouse gasses.

Goals		Periods	Areas responsible
1	Use of bio-diesel in the bucket loaders	2008	Labour Risk Prevention, Quality and Environment management
2	Use of flare gases in the boiler	August	Projects
Compliance indicator: % of bio-fuel employed out of the total percentage of flame gases used in the boiler		Objective 100%	

Objective 5: environmental certification in EMAS.

Goals		Periods	Areas responsible
1	Preparation of Environmental Statement	March 2008	Labour Risk Prevention, Quality and Environment management
2	Environmental Management System check by certified controller	March 2008	Labour Risk Prevention, Quality and Environment
3	Validation of environmental statement	March 2008	LRP, Quality and Environment
4	EMAS registration in the authorised body	March 2008	LRP, Quality and Environment
Compliance indicator: degree of progress		Objective 100%	

Management indicators:

Use of nitrogen/t of treated salt slag (Objective 0.25 kg/t)

Use of fuel/t of treated salt slag (Objective 0.45 l/t)

Use of caustic soda/t produced (Objective 1.254 kg/t)

Use of flocculant/t of treated salt slag (Objective 0.10 kg/t)

Deviations as a result of internal and external audits (Objective <10/year).

On-going action for improvement

Resolution reports for on-going problems (Objective 35/year).

13. Further relevant activities in the area of the environment

- To achieve our aims Befesa Escorias Salinas S.A. has always been aware of the need to count on the collaboration of highly qualified motivated personnel. Consequently, each year an ambitious training plan is drawn up related to Quality, Prevention and Environment, in which both fixed staff and newly recruited members actively participate. During 2007 almost 2,000 hours have been invested in staff training.
- Befesa Escorias Salinas S.A., conscious of the fact that to carry out its environmental policy as well as the aims and targets set it was necessary to implement an advanced environmental management system, had its system certified in the year 2000 by the B.V.Q.I. certification body, in accordance with ISO norm 14001. In line with its environmental commitment, Befesa Escorias Salinas S.A. has decided to adhere voluntarily to the EMAS community system of environmental management and auditing.
- According to ISO norm 14001 and the EMAS European Regulation, Befesa Escorias Salinas S.A. has submitted itself to the corresponding environmental audits, both internal and external, in order to check the propriety of the environmental management system implemented. Auditing is a key element for ascertaining both the validity of the data obtained by the different departments during operations, as well as that of the procedures and instructions designed to achieve correct management. When, during the auditing sessions, there is found to be Non-Conformity with the Integrated Management System, then the Corrective Actions are activated to bring a solution to this situation. The internal and external auditing programme has been satisfactorily applied throughout 2007.
- Befesa Escorias Salinas S.A. possesses the corresponding authorisation for managing dangerous wastes.
- Befesa Escorias Salinas S.A. belongs to and actively participates in the following associations:
 - Spanish Quality Association (AEC).
 - Spanish Confederation of Metal Organisations CONFEMETAL, and an active member of the Environment Committee.
 - Members of the Permanent Environmental Forum of the Official Chamber of Commerce of Valladolid.
 - Spanish Association of Special Wastes Managers ASEGRE: This includes companies within Spain whose activity is managing dangerous wastes.
- Befesa Escorias Salinas S.A. regularly participates in R+D+I programmes with various research centres and other European firms fundamentally involved in improving recycling, assessment and maximum yield from aluminium industry wastes.

14. Complaints and claims

During 2007 operations, no complaints or claims have been received related to the environment.

15. Next environmental statement

The aim of this Environmental Statement is to inform collaborators, authorities, clients, suppliers, means of communication and neighbours about our Management Policy, and at the same time to promote constructive dialogue.

The next Validated Environmental Statement will be drawn up in March 2009.

Befesa Escorias Salinas S.A.
Valladolid March 2008

