BEFESA Befesa Zinc Aser

BEFESA



This Environmental Statement is intended to inform collaborators, public authorities, customers, suppliers, media and neighbours about our Management Policy and to likewise propose a constructive dialogue.

The data provided in this statement are from 2014.

Table of Contents

1. Description of the organisation and summary of activities	3
2. Description of the Environmental Management System	5
3. Relation to other related organisations	7
4. Environmental Aspects	8
4.1. Significant environmental aspects	8
5. Environmental programme. Objectives and goals	8
5.1. Summary of 2014 Objectives and Programmes	9
5.2. Proposed objectives for 2015	10
6. Basic indicators	10
6.1. Recycling of steelworks dust for recovery of Zn and Pb	10
6.2. Efficiency in the consumption of materials	.11
6.3. Energy eficiency	12
6.4. Water	. 13
6.5. Emissions	14
6.6. Waste	16
6.7. Biodiversity	18
7. Applicable Environmental Legislation	18
8. Validation of the Environmental Statement	19
9. Site Plan of the installations	20
Annex I: Glossary of Terms	21



1. Description of the organisation and summary of activities

Befesa Zinc Aser is located close to Bilbao, having begun its industrial activity in 1987. It is the only plant in Spain for recycling of the dust generated in steelworks with electric arc furnaces, recovering the zinc and the lead that they contain.

The residual dust generated in the electric arc steelworks (EAF dust) with high metal content, mainly Zn, Fe and Pb, is classified as hazardous waste for the environment by the legislation of all developed countries, as in natural conditions its lixiviates solubilise heavy metals.

The main motivation of Befesa Zinc Aser is to recover these metals (primarily Zn) from these wastes for reincorporation into the market, when otherwise they would have to be extracted from natural mine resources.

This activity has a dual environmental benefit: on one hand it prevents the pollution

caused by discharging steel works dust and on the other it is an inexhaustible source for obtaining metals as compared to mining extraction, consequently prolonging the depletion rate of the planet's resources.

The activity of Befesa Zinc Aser, S.A.U. is recovery and recycling.

The process of recycling and recovery carried out in Befesa Zinc Aser is by means of two processes:

- 1. Pyrometallurgical, "the Waelz process",
- 2. Hydrometallurgical, "the Double Leaching Waelz Oxide process".

Both processes are considered as BAT (Best Available Technology) in the "Reference Document for the Best Availably Technologies for Non-Ferrous Metallurgy" prepared at the request of the European Commission.



Galvanised steel zinc recycling circuit diagram

The residual dusts from the steelworks are fed into a Waelz furnace where the necessary reduction/oxidation reactions are produced to separate the heavy metals, mainly Zn and Pb, which are reoxidised forming the Waelz Oxide, from the rest of the elements of the steelworks dusts.

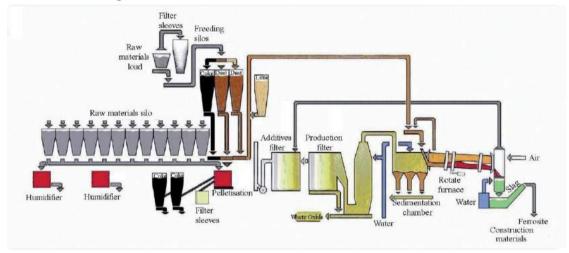
These other elements, mainly oxides of iron, lime and silica, give rise to non-ecotoxic inert slags which, when transformed, make up a by-product called Ferrosite[®], with a number of applications such as, secondary

Waelz Plant Diagram

aggregate in construction.

The consumption of lime depends of the basicity of the treated wastes, that is, on the quantity of Ca, Si and Mg that they contain.

The Waelz Oxide is transported by the gaseous current that flows from the furnace to the gas leaching system, consisting of a sedimentation chamber, a conditioning tower, an electro filter and a sleeve filter.



The leached gases are evacuated through the chimney with continuous measurement of the presence of particles, thereby complying with the environmental regulations applicable to the Company.

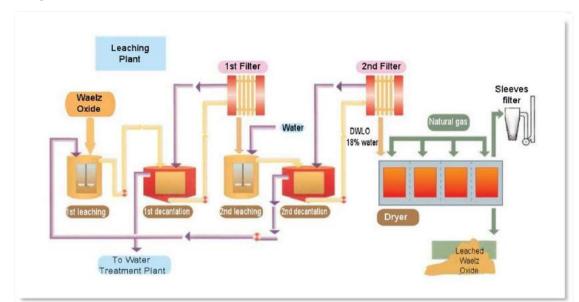
When the WO has been captured, it undergoes a process of lixiviation, to eliminate the halogens (predominantly chlorides) and the alkalines that it contains.

The water used in the lixiviation process is pumped to the water treatment plant where it undergoes a physical-chemical treatment that causes the precipitation and separation of the residual metals.

This leached Waelz Oxide, called D-L.W.O., can be used in zinc and lead pyrometallurgical or in electrolytic zinc companies.

Waters originating from the Lixiviation plant undergo a process of physicalchemical leaching in the Water Treatment Plant itself, where the metallic compounds that they might contain are leached out. Metallic sludge removed from the effluent are treated in the Waelz furnace.

Diagram of the Waelz Oxide Lixiviation Plant



2. Description of the Environmental Management System

Befesa Zinc Aser currently has implemented an Integrated Quality and Environmental Management System.

Historical record of certificates and adhesions:

•1995: Certification as per the International Standard ISO 9001 (SGI 1942018).

• 1997: Certification as per the International Standard ISO 14001 (SGI 1942018).

1998: Voluntary adhesion the to Community Ecomanagement and Ecoauditing System (EMAS) under registration number ES-EU-000002.

As the cornerstone of the IMS, Befesa Zinc Aser's Management has developed and adopted Integrated Quality an Environment Management, and Occupational Health and Safety in the Workplace Policy. This policy contains the intended general management guidelines and is a "living document" and as such has undergone several revisions over the years, so as to ensure that they meet the requirements of the ISO 9001 and 14001 Standards and EMAS.

BEFESA

Zinc Aser S.A.U.

Zinc Comercial S.A.U.

Quality Management, Environment and Prevention of Occupational Health and Safety Risks Policy Revision no : 3 Date: 12:05:2010

Belase Znc Aser: S.A.U. and Belase Znc Comence. S.A.U dedicate their admittes to the pyrometallurgical recovery of znc and lead contained in ferrous and non-ferrous industry wate and the subsequent manifesting of the product doctined.

With this Policy, which provides the reference transpoor for setting and reviewing contribuous improvement objectives, both companies state as their objective that their products, services, systems and processes are carried out amend at the hall spatiation of all customers, in namous with the environment and surroundings, and in safe and safetrious working conditions for its workers.

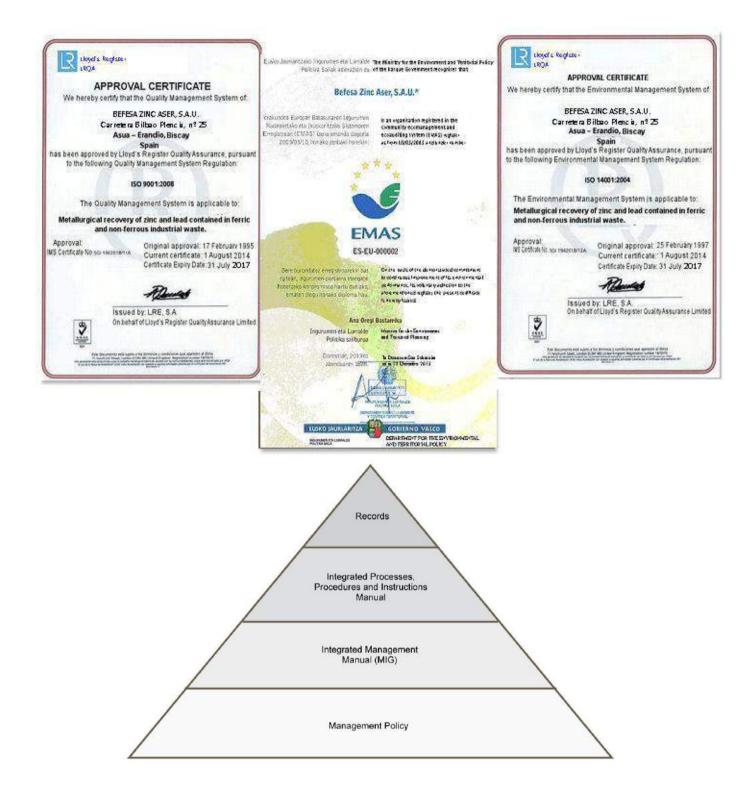
Management herein specifically undertakes to

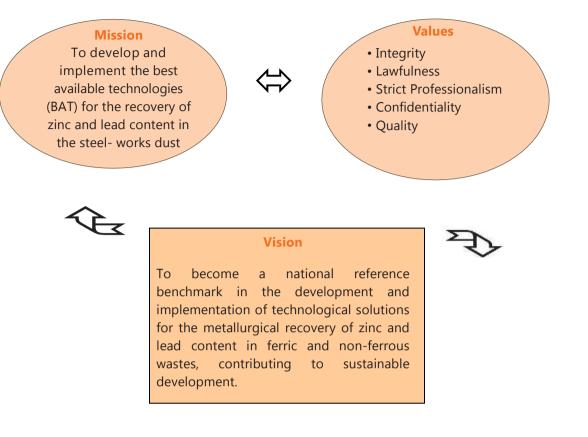
- Management herein specifically undertakes to
 Company with current legislation and other commitments that the company subscribes to applicable to the abovementationed activity.
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The Integrated Management System of Befesa Zinc Aser is underpinned in its documentary structure, which can be summarised as:





3. Relation to other related organisations

Befesa Zinc Aser co-operates actively with numerous environmental bodies.

Of the various Associations working on behalf of the environment and in which the Company participates directly, noteworthy are:

- Asegre: "Association for Waste Management Companies and Special Resources". Brings together companies in Spain whose business activity is the management of hazardous wastes.
- Aclima: "Cluster Association of Environment Industries of Euskadi". Brings together companies and institutions in the Basque Country whose purpose is the implementation of actions that are considered appropriate for the improvement of the competitiveness of the Basque eco-industry and related industries.

• **Stop CO₂ Euskadi:** Stop CO₂ Euskadi is the first action initiative in the fight against climate change launched in the Autonomous Community of the Basque Country which encompasses the actions of the general public, companies and public administrations. It is an open initiative which can accommodate actual commitments to reduce emissions of greenhouse gases by the members of the Basque society.

• 2010-2014 Ecoefficiency programme in Basque companies: intends to increase the competitiveness of Basque companies through environmental behaviour improvement.

4. Environmental Aspects

The reason for drawing up a register of significant environmental aspects is to identify the main areas of work so as to minimise the environmental impact of the Company, to ensure continuous improvement and the awareness-raising and training of the work force.

4.1.Significant environmental aspects

The significant direct environmental aspects resulting from the evaluation of all the environmental aspects in 2014 and its relation with the improvement objectives are as follows.

Aspect	Туре	Impacts	Improvement aims
Consumption of energy sources	Petroleum coke	Depletion of natural resources	The significance of these three aspects is due to the considerable quantity consumed and to its nature as an energy resource that is difficult to reverse. However, it is an essential resource for the operation of the production process and its control is tailored to its real needs. To that end, it is not necessary to set any improvement objective, although a process objective has been set for maintenance of the level of consumption per quantity of raw material treated in the furnace.
Generation of non-hardouse waste	Surplus slag	Depletion of natural resources	This aspect is significant because of the quantity generated, and its use. It cannot be separated from the manufacturing process and this surplus is a temporary happenstance and depends on the current economic situation. The management of this waste is adequate and its generation depends on external causes and thus it is not considered necessary to set a specific improvement objective or improvement action in this regard.

The direct significant aspects under normal operating situations are:

There has been no significant environmental aspect under abnormal operating conditions, incidents or emergencies.

No indirect environmental aspect has been identified as significant following its evaluation. In any event, management practices are being performed on some of them.

5. Environmental programme. Objectives and goals

Each year the Management Committee selects a number of objectives and goals with the aim of advancing towards continuous improvement in our plant.

The people in charge of each objective are responsible for drawing up specific Objectives Files, which are described in detail, so as to achieve the associated goals.

5.1. Summary of 2014 Objectives and Programmes

Belowwedescribetheenvironmentalimprovementobjectivesofthatworkwhichhasbeenperformedin2014, as well as its attainment:

Aspect	Impacts	Objectives/Goals	Actions in 2014	Deadline	Status
Diffuse emissions in the pellitisation area and raw material hoppers	Emissions to air	Reduction of diffuse emissions in order to eliminate wind emissions and to thus attain a better working performance of the equipment	Covering of the pellitisation area	Late 2014	Closed satisfactorily
Consumption of energy resources	Depletion of natural resources	 Implementation and certification of theISO5001Standard(Energy Management Systems) so as to: Reduce consumption Increase the energy efficiency of the organisation Continuous improvement of the energy performance. Reduction of associated GHG emissions 	 Undertaking of an external energy assessment Drawing up/implementati on of set procedures/doc uments 	Late 2015	Ongoing
Not applicable	Not applicable	Detailed structuring of the environmental management documentation for environmental vectors	Definition of new environmental vector structure and procedure model	Late 2015	Ongoing
Consumptio n of energy resources	Depletion of natural resources	Increased energy efficiency in the lighting system	Change of lighting in the building's offices 1. Energy savings of 41,154 MWh per year obtained	Late 2016	Ongoing
Consumptio n of energy resources	Depletion of natural resources	Increased energy efficiency in the compressed air system. Estimated savings of 515 MWh per year	Energy study to confirm the projected savings in the external energy assessment	Late 2015	Ongoing

5.2. Proposed objectives for 2015

In 2015 it is intended to continue or conclude the environmental improvement objectives commenced in 2014. Furthermore, a new objective has been set for its commencement in 2015:

Aspect	Impacts	Objectives/Goals	Actions	Deadline
Diffuse emissions in the storage area	Air emissions	Reduction of diffuse emissions generated mainly by the storage and handling of materials	1 st stage. Delimit the production warehouse	Late 2016

6. Basic indicators

As our business activity is not tailored to any of the sectorial guidelines as regards the published EMAS, this statement is made on the basis of that stipulated in Regulation 1221/2009 (EMAS III) and the Resolution of the Commission of 4 March 2013.

Given the consumption of materials, emissions and waste generation are

always dependent on the amount of waste treated in the process, it is interesting to consider that this treated waste is used as a reference to calculate the specific data (ratios), rather than the product produced.

These ratios represent the actual efficiency of these indicators.

6.1 Recycling of steelworks dust for recovery of Zn and Pb

Shown below is an evolution over the last five years of the treatment of wastes

and recovered Zn:

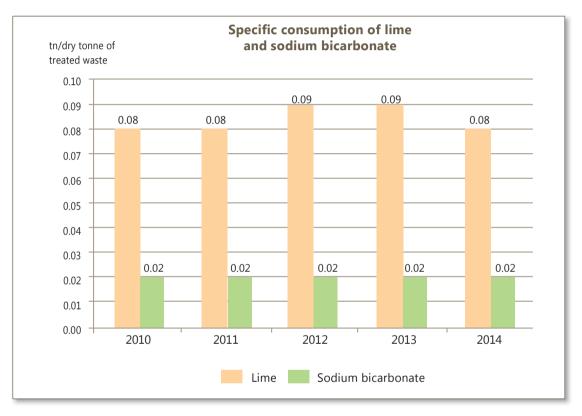


6.2. Efficiency in the consumption of materials

Shown below are the absolute consumption (tn) and relative consumption (amount per dry tonnes of treated waste) of

ption the main auxiliary materials used in the t per production process over the last five years:

Resource	Units	2010	2011	2012	2013	2014
Lime		12,093	13,537	13,210	12,767	11,539
Sodium bicarbonate	Tonnes	3,467	3,730	3,679	3,300	2,909





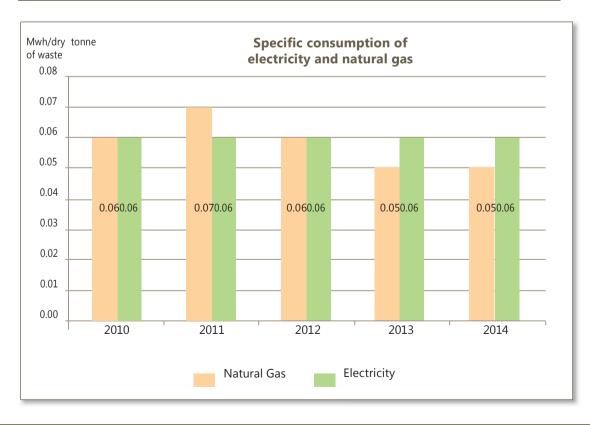
Firebrick

6.3. Energy efficiency

Shown below are the absolute consumption (MWh, t and L) and relative) consumption (amount per dry tonnes of

treated waste) of the main energy resources used in the production process over the last five years:

Resource	Units	2010	2011	2012	2013	2014
Deducing	Tonnes	23,921	25,763	25,109	25,133	23,359
Reducing agents	tn/dry tns of treated waste	0.16	0.16	0.16	0.17	0.17
Notural gas	Mwh	8,852	11,751	9,83	7,187	7,599
Natural gas	Mwh/dry tns of treated waste	0.06	0.07	0.06	0.05	0.05
	Mwh	9,046	9,482	8,916	8,423	8,123
Electricity	Mwh/dry tns of treated waste	0.6	0.06	0.06	0.06	0.06
	Litres	97,240	92,000	76,343	77,359	74,189
Diesel	L/dry tns of treated waste	0.65	0.58	0.49	0.52	0.53



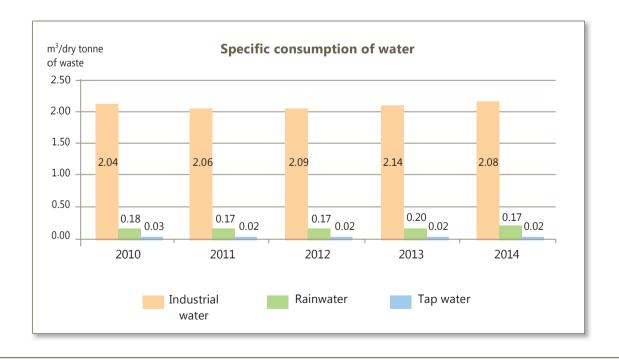
6.4. Water

With in the basic indicator as regards water two different aspects must be considered; on one hand the consumption of different types of water and the other the volume of water discharged in to the sewer of the Water Consortium of Biscay.

Consumptions

Shown below are the absolute consumptions (m³) and relative consumptions (amount per dry tonne of treated waste) of water over the last five years:

Consumed resources	Units	2010	2011	2012	2013	2014
Industrial water	m ³	304,065	329,151	322,972	315,254	290,666
Rainwater	m³	26,955	27,563	26,458	29,011	23,233
Tap water	m ³	5,086	3,122	2,981	3,245	3,012
TOTAL	m³	336,106	359,836	352,411	347,510	316,911



•Spillage to the sewer of the Water Consortium of Biscay

In 2014 the volume of discharged water rate rose to 214,245 m³. The following table shows the values measured in 2014 of the parameters

set in the Sewer Discharge Permit and its comparison with the maximum permissible limit values:

Parameter	Units	Daily limit value	2010 Maximum	2011 Maximum	2012 Maximum	2013 Maximum	2014 Maximum	Complianc e
Solids in suspension	mg/L	600	29.7	25.8	12.1	11.1	22.0	\checkmark
Sulphates	mg/L	3000	2,472.3	2,349.6	2,463.6	2,381.5	2,513.5	\checkmark
Dissolved sulphates	mg/L	4	0	0	0	0	0.4	\checkmark
Silver	mg/L	1	0	0	0	0	0	\checkmark
Lead	mg/L	3	1.30	1.73	0.82	1.55	1.27	\checkmark
Zinc	mg/L	15	5.64	2.70	2.99	2.04	3.97	\checkmark
Arsenic	mg/L	1.5	0.23	0.32	0.40	0.36	0.21	\checkmark
Cadmium	mg/L	1.5	0.23	0.15	0.11	0.04	0.12	\checkmark
Chromium	mg/L	0.75	0.27	0.04	0.04	0.03	0.02	\checkmark
Copper	mg/L	7.5	0.08	0.06	0.05	0.03	0.03	\checkmark
Iron	mg/L	150	4.37	0.30	0.28	0.36	0.32	\checkmark
Mercury	mg/L	1.5	0	0	0	0	0	\checkmark
Nickel	mg/L	5	0	0	0	0	0	\checkmark

Remark: The specified values refer to data obtained in the measurements made by the company's laboratory.

Criteria 4 set in the Monitoring BREF "Reference Document on the General Principles on Monitoring" published in July 2003, the values below the detection limit were calculated using the following formula (100%-% of the values below the detection limit)*detection limit value is adhered to.

6.5. Emissions

Befesa Zinc Aser has a single source of emissions, which is the Waelz chimney. Among the different emitted parameters are the following:

• Total Annual Emission Of Greenhouse Gases (GHG):

Currently, our company is accredited as per the ISO 14064 Standard (Quantification of green house gas emissions) and is affected

as a new entrant inthe2013-2020 period by the Emission Trading Scheme (ETS).

Absolute and specific total emissions in recent years affected by the EU emissions trading system (EU ETS) are shown in the following table[.]

	Emissions	(t CO2 eq)	Emissions (t CO ₂ e/ dry tns of treated waste)		
	2013	2014	2013	2014	
Direct	80,947	80,947 74,382		0.53	
Indirect	1,485	1,485 1,335		0.01	
Total	82,432	75,717	0.56	0.54	

• Emissions to the atmosphere of other pollutants:

The total emissions of $SO_{2^{\prime}}$ NO_x and dust particles from the Waelz chimney and the mobile combustion of diesel corresponding to the last five years in absolute and

Specific values per tonne of treated waste are shown in the following table:

	2010		2011		2012		2013		2014	
Parameters	Emissions (kg)	Specific emissions (kg/tonne per waste)								
SO ₂	4,565.83	0.03	4,009.67	0.03	425.84	0.00	750.37	0.01	11,105.85	0.08
NOx	19,742.81	0.13	264.51	0.00	47,817.19	0.31	40,794.20	0.28	21,667.64	0.16
Solids particles	965.64	0.01	1,559.93	0.01	2,032.67	0.01	2,598.60	0.02	2,066.42	0.01

As regards to the emissions to the Integrated Environmental Authorisation and atmosphere by the Waelz chimney, the following table shows the values measured in 2014 of the limited parameter oft he

its comparison with maximum permitted limit values.

Parameter	Units	Limit Value	2010 Maximum	2011 Maximum	2012 Maximum	2013 Maximum	2014 Maximum	Compliance
Solid particles	mg/m³N	20	3.4	5.6	3.8	5.4	3.5	\checkmark
SO ₂	mg/m³N	150	42.0	37.0	0.5	2.2	63.2	\checkmark
Pb+Cr+Cu+Mn	mg/m³N	5	0.159	0.607	0.082	0.123	0.131	\checkmark
Ni+As	mg/m³N	1.00	0.006	0.042	0.019	0.019	0.004	\checkmark
Cd+Hg	mg/m³N	0.20	0.099	0.165	0.169	0.096	0.024	\checkmark
NO _x	mg/m³N	300	52.4	-	80.2	77.8	40.9	\checkmark
HCI	mg/m³N	-	1.1	-	0.3	0.2	0.4	\checkmark
VOC	mgC/m³N	-	259.6	131.0	131.0	626.5	747.7	\checkmark
Dioxins and furanes	I-TEQng/m ³ N	-	0.026	0.028	0.044	0.056	0.07	\checkmark

Remark 1: As regards to metals, the value shown is the sum of the values obtained in the particulate and gaseous stages.

Remark 2: In terms of the methodology in calculating the values below the detection limit. Criteria 4 set in the Monitoring BREF "Reference Document on the General Principles on Monitoring" published in July 2003, which states that the values below the detection limit should be calculated using the following formula: (100% - % of values below the detection limit)* detection limit value is adhered to

6.6. Waste

In Befesa Zinc Aser waste of various kinds from maintenance operations and ancillary activities are generated, reason why it is not dependent on the manufacturing process. In our facilities there are have several waste recycling points properly marked and labelled where the waste is deposited depending on their nature for its subsequent treatment, recovery or recycling.



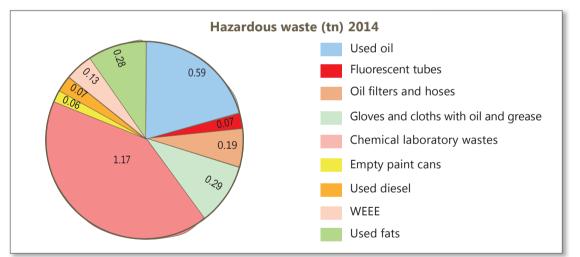
Waste recycling points in Befesa Zinc Aser



In the last five years the following amounts of waste have been generated:

		2010	2011	2012	2013	2014
	tn	250.64	6,663.26	46,583.01	95,353.18	89,191.08
Non- hazardous waste	tn/dry tn of treated waste	0.00	0.04	0.30	0.65	0.64
	tn	7.42	4.09	4.23	3.27	2.84
Hazardous waste	tn/dry tn of treated waste	0.00	0.00	0.00	0.00	0.00
Total waste		258.05	6,667.35	46,587.24	95,356.45	89,193.92

Both hazardous and non-hazardous wastes are delivered to an authorised waste manager.



	2014
Non-hazardous waste	tn
RAU in container	46.93
Paper and cardboard	1.50
Scrap metal	11.38
Toner and cartridges	0.04
CDs and DVDs no longer in use	0.01
Excess slag	89,131.22

6.7. Biodiversity

Befesa Zinc Aser has 26,570 m² of paved and constructed land.

Nevertheless, there is no impact to biodiversity, given that the land is not included nor is sufficiently close enough to have any environmental impact on any Protected or special interest area regarding biodiversity.

The specific occupation of paved land per tonne of treated waste treated is 0.19.

7. Applicable Environmental Legislation

The Company has hired a service for • identification, supply and updating of legal texts every quarter.

Using this information the new requirements or their amendments are found and the legislative data base itself is updated with the requirements applicable to the Company.

The following is a non exhaustive list of the most relevant applicable environmental legislation:

Specific legislation:

- Resolution of 24 July 2007 where in the IEA is granted to Befesa Zinc Aser.
- Sewer Discharge Permit from the Water Consortium of Bilbao-Biscay in 2006 and its 2007 amendment.
- Resolution of 5 October 2009 from the Deputy Ministry for the Environment wherein the IEA granted to Befesa Zinc Aser was amended and come into force. This resolution was granted following an environmental inspection by the inspectorate service of the Deputy Ministry for the Environmental of the Basque Government.
- Order of 2 March, 2010 from the Ministry for the Environment wherein a ruling was handed down regarding the appeal filed against the Resolution of 5 October 2009 by the Deputy Ministry for the Environment.

- Resolution of 20 May 2011 by the Deputy Ministry for the Environment wherein the IEA was amended.
- Resolution of 14 December 2012 by the Deputy Ministry for the Environment wherein the emission of greenhouse gases permit was granted to Befesa Zinc Aser for its plant located in the municipality of Erandio and the amendment contained in the resolution of 1 February, 2013 by the Deputy Ministry for the Environment, as well as the updating of Annex I which was attached to the latest resolution.

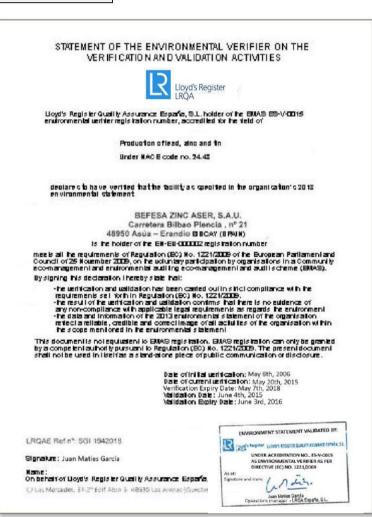
Generic legislation

- Legislation applicable to new entrants in 2013 to the emissions rights trading scheme.
- Legislation applicable to IPPC companies.
- Legislation applicable to E-PRTR companies.
- Legislation applicable to waste management companies.
- Legislation applicable to manufactured/marketed products (REACH).
- Legislation applicable to facilities where activities are carried out which can generate emissions that can potentially pollute the atmosphere (APCA).

8. Validation of the Environmental Statement

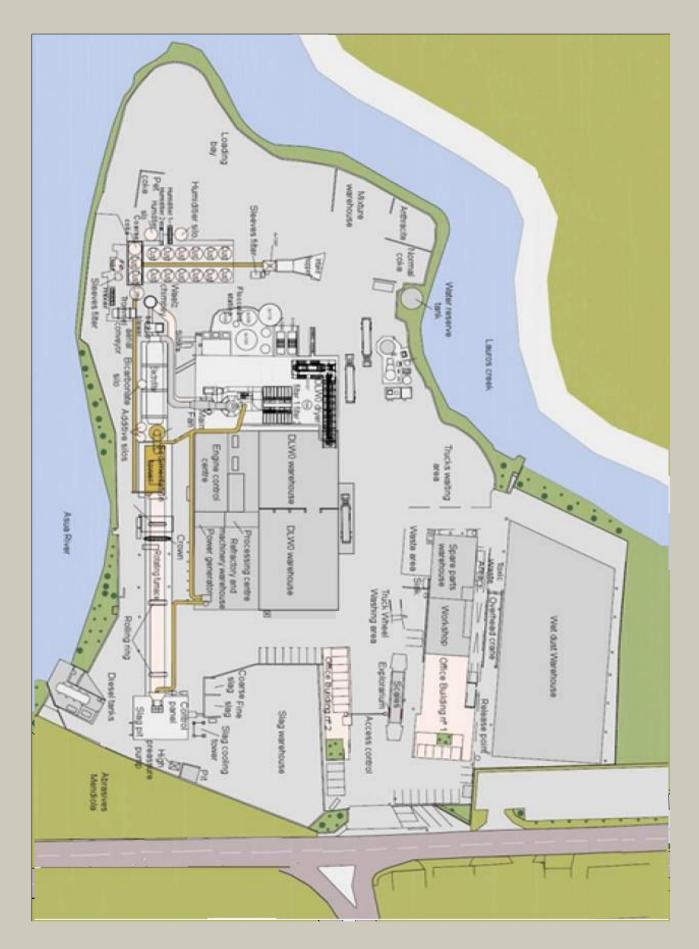
The contents of this Environmental Statement must be validated by an independent and accredited environmental verifier. Thus, this report has been validated by Lloyd's Register Quality Assurance in May2015.

CNAE Accreditation No.	ES-V-0015
Accredited Verifier	Lloyd's Register Quality Assurance España, S. L. C/LasMercedes,31-2.º Edif.Abra3 Las Arenas (Getxo) Biscay
Statement date	May2015



Befesa Zinc Aser's CNAE classification (Ver2) no. is 24.43. Date of Next Environmental Statement: May 2016.

9. Site Plan of the installations



Annex I: Glossary of Terms

IPPC:	The Integrated Pollution Prevention and Control Directive.
O.W.:	Waelz Oxide.
D-L.W.O.:	Leached Waelz Oxide.
Zn:	Zinc.
Pb:	Lead.
CI:	Chlorine.
SO ₂ :	Sulphur dioxide.
Cr:	Chromium.
Cu:	Copper.
Mn:	Manganese.
Ni:	Nickel.
As:	Arsenic.
Cd:	Cadmium.
Hg:	Mercury.
Fe:	Iron.
NOx:	Nitrogen Oxide.
VOC:	Volatile organic compounds.
HCI:	Hydrochloric acid.
BREF:	BAT Reference. Best Available Techniques. Document for the Best Available Technologies.
RAEE:	Waste electrical and electronic equipment.
RAU:	Solid waste. Similar to that produced within an Urban Environment.
RCD:	Construction and Demolition Waste.
GEI:	Green house Gases.
AAI:	Integrated Environmental Authorisation.
t:	Tonne.
m ² :	Square metre.
m ³ :	Cubic metre.
t CO ₂ eq:	Tonnes CO ₂ equivalent.
mg/m ³ N:	milligrams per cubic metre under normal conditions.
mg/l:	milligrams per litre.
Mwh:	megawatts per hour.
E-PRTR:	European Pollutant Release and Transfer Register.
REACH:	Regulation governing the registration, evaluation, authorisation and restriction of chemical substances.



Ctra. Bilbao Plencia, 21 48950 Erandio **Biscay (Spain)** Tel: +34 944 535 030 Fax: +34 944 533 380 zinc.aser@befesa.com www.befesa.es



