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Issued by: Environmental Engineer:	Approved by: General Manager:	



**ENVIRONMENTAL MANAGEMENT SYSTEM
MANUAL**

EN ISO 14001:2004

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1. Confidentiality

The Environmental Management System Manual describes the Environmental Management Policy of ANTEA Cement Sh.A. In addition, this document describes the organization and responsibilities for the implementation of this policy.

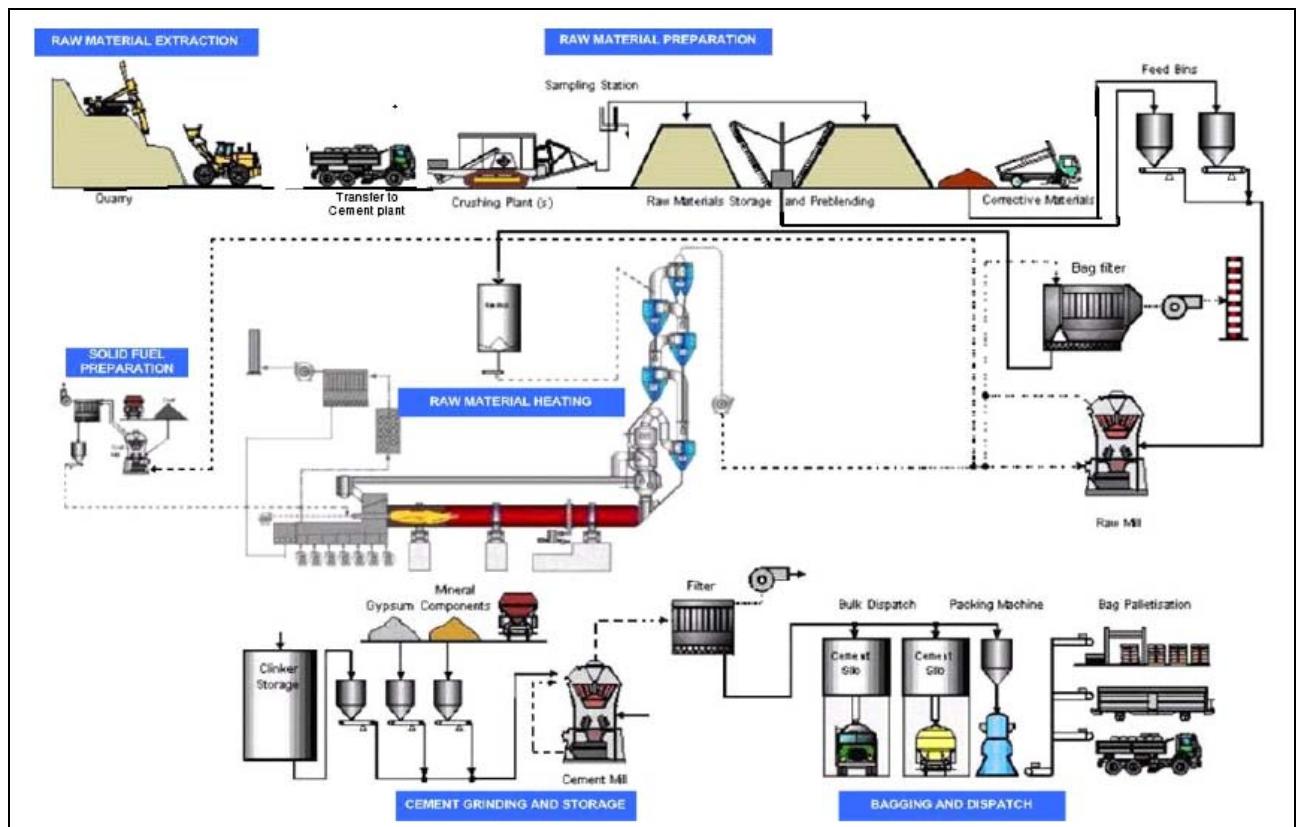
The policy and the procedures cover the cement Plant and the Quarries of ANTEA Cement Sh.A.

This Manual is the intellectual property of ANTEA Cement Sh.A. and should not be given, all or parts of it, to third parties, unless the General Manager or the Environmental Engineer has approved it.

2. Antea Cement SH. A.


Antea Cement, part of the Greek owned Titan Group, constructs a cement production facility in Albania, built and operated to world class design and technological standards. The facility will be capable of producing 3 300 tonnes per day (tpd) of clinker (the main component of cement) and will incorporate the development of two quarries associated with producing the main raw materials for this operation. The location of the development is near the communities of Burizana, Picrraga and Brett in Albania.

The plant will produce cement from solid raw materials extracted from the adjacent quarries. The raw materials are heated to a very high temperature causing the thermal reactions which produce cement clinker. This clinker is then crushed to produce the cement for sale. A Process Flow Diagram illustrating the process is presented in the following figure.



A brief summary of each stage of the production process is as follows:

- Raw Material Extraction:** Extraction of the raw materials is from local quarries. The main raw materials are limestone (chalk) and silica-aluminate (a clay-like material also known as "flysch"). The extracted materials will be loaded on to transporters and taken to the cement plant area. In order to prevent dust emissions during the transport of extracted materials, all raw material preparation will take place in a controlled

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environment at the cement plant. No crushing will take place at the quarries. In the event that incidental dust emissions do arise at the quarries or during transport of quarried materials to the cement plant, the quarried materials and roadways will be sprayed with water to prevent wind entrainment of the dust.


- Raw Material Preparation:** Once the raw materials have arrived at the cement plant they are crushed in separate crushers to produce the correct size of stone for feeding into the cement production process. In order to minimize dust emissions at crusher inlets, water curtains will be used. Crushed materials will be stored in large covered stock piles. No crushed materials will be stored outdoors. The process of crushing, stacking and reclaiming for the purpose of feeding into the next stage of the process also achieves raw material 'pre-blending'. The raw materials then fed in to separate feed bins.

An iron source and bauxite are also required to make cement and these will be delivered to site from external sources and stored in silos. These materials will be needed in relatively small quantities.


From the feed bins, the raw materials are fed to the raw mill, where they are ground to a fine powder. Before entering the raw mill, each material is weighed to adjust the chemistry of the raw mix. The ground raw material (raw meal) is transported to the homogenization silo, where it is blended (homogenized), by following a certain extraction sequence as the material leaves the silo.

At all stages of raw material preparation, appropriate methods will be used to prevent escape of dust, including enclosed conveyors and storage, minimization of material drops, use of bag filters at the raw mill. All bag filters will be designed and operated to ensure particulate emissions below 30 mg/Nm³, in accordance with industry standards.

- Solid Fuel Preparation:** The production of cement requires a significant amount of energy. In order to provide this energy, conventional solid fuels are burned, e.g. coal, petroleum coke or lignite. The fuels will be transported to the cement plant by lorries from local ports. In this case, most probably Durres. The fuel used in the Antea cement plant will have been extracted overseas. Before being burnt, the fuels, like the raw materials, have to be crushed prior to feeding into the cement production process.
- Raw Material Heating:** The raw materials are added and heated to high temperatures; the cement "clinker" being formed as a result of thermal reaction. The Antea cement plant will use the most modern and efficient design for undertaking this process. The raw materials are first fed into a 5 stage 'pre-heater' heated by hot gases from next stages of the process. The end part of the pre-heater is called the 'pre-calciner', where more than half the fuel is burnt and the chemical reactions are well underway. The raw material mix enters the large, horizontal kiln where the remaining fuel is burnt and the final high temperature chemical reactions take place. The produced clinker is then cooled before storage.

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- **Cement Grinding and Storage:** The clinker is ground with additives (e.g. gypsum, limestone, fly ash) depending on the quality requirements of the final cement. The cement dust is then stored in large silos.
- **Bagging and Dispatch:** Part of the cement will be sold in bulk and will be transported in specialized bulk road transporters. The rest will be bagged on site at a bagging plant, before being dispatched to the customer.

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3. Environmental Policy

ANTEA Cement Sh.A., part of the Greek owned Titan Group, constructs a cement production facility in Albania, which will produce cement from solid raw materials extracted from adjacent quarries. ANTEA Cement has established, documented, implemented and maintains an Environmental Management System and continually improves its effectiveness in accordance with the requirements of the standard ISO 14001: 2004. The scope of the System is to cover all environmental issues concerning the construction of the plant, the production of cement and the exploitation of its quarries.

The System places the means for setting, promoting, reviewing and resetting environmental targets and objectives for the continual improvement of ANTEA Cement environmental performance and prevention of the negative impacts to the environment, through:

- Continuous effort for abatement of the adverse consequences of the Company's activities to the environment.
- Full compliance with the applicable national, legal and other requirements.
- Controls of the production processes for ensuring the effectiveness of the protection measures for the environment.
- In the design and operation of the installations to consider the mitigation of the environmental impact as well as the efficiency in the use of energy aiming at the preservation of natural resources.
- Providing continuous training, education and encouragement to the personnel for the increase of its environmental awareness and responsibility.
- Monitoring the performance of the Environmental Management System towards continuous improvement by setting targets on an annual basis.
- Aiming at the promotion and adoption of the Company's environmental policy from its contractors, suppliers and collaborators.
- Promoting and encouraging of the exchange of environmental knowledge and experiences between the Company and the local authorities.
- Participation of the Company in the determination of industrial sectoral targets and in the enactment of national standards for the sector.
- Supporting, and participating in research programs in pursuit of environmental excellence.

The Management of ANTEA Cement hereby commits to:


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- Continuously improve the Environmental Management System and constantly promote its improvement in accordance with the requirements of ISO 14001.
- Establish, monitor and revise all relevant aims and goals as well as the programs for their fulfillment, provide the required funds for their realization and constantly improve the company's environmental performance.
- Ensure that all employees are fully aware of their responsibilities and obligations described in the Environmental Management System, and participate actively in it.

General Manager

The Environmental Policy has been posted accordingly on the Notice Boards of ANTEA's workplace and offices and is available to all interested parties.

It is noticed that for the Construction Phase the role of Plant Manager in the system procedures will be played by the Technical Project Manager as far as the operational issues are concerned, wherever such procedures are applicable.

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4. Environmental Aspects

The Company establishes and maintains procedures to identify and handle the environmental aspects of its activities within the defined scope of the Environmental Management System (see Procedure IP.300).

Based on the legislative, regulatory and other requirements to which the Company subscribes (see Procedure PP.200) as well as on the Company's environmental policy, the Environment Board draws up tables of environmental aspects of all the Company's activities.

The Environment Board identifies the environmental aspects taking into account current and past activities, planned or new developments, new or modified activities (including purchased materials and activities of suppliers), normal and abnormal operations, shut-down and start-up conditions, as well as reasonably foreseeable emergency situations.

The Environment Board defines and records for each environmental aspect the resulting impacts, the evaluation criteria, the significance of each aspect, the objectives, the measures to be taken (e.g. Working Instructions, Programs) and the indicators and targets.

At least every year (see Procedure EP.410), or when the current analysis of environmental aspects is no longer valid or if there are significant changes (e.g. in equipment, legislation), a review of the environmental aspects takes place by the Environment Board.

All major suppliers and subcontractors are evaluated by the Company prior to any co-operation with them. The Purchase Department in co-operation with the Environmental Engineer collects data relative to the environmental performance of major suppliers / subcontractors. Responsible for approving or rejecting major suppliers / subcontractors is the Purchase Manager, who uses all the available data regarding the environmental performance of major suppliers, as well as other appropriate data. The environmental performance of major contractors is re-evaluated if it's necessary (see Procedure IP.330).


Relevant Procedures

PP.200 Legislation / Regulation Monitoring and Application Compliance

IP.300 Environmental Aspects

IP.330 Suppliers / Subcontractors

EP.410 Management Review

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5. Legal and Other Requirements


The Environmental Engineer is responsible for seeking, collecting, categorizing, maintaining and updating the respective legislation, regulations and other relevant documents that are applicable to the Company's environmental aspects. These documents may be, among others national legislation, state / provincial / departmental legal requirements, permits and licenses, International / European standards and regulations, agreements with public authorities, public commitments of the Company, Corporate / Company requirements etc.

The Environmental Engineer reviews the collected documents and determines how legal and other requirements apply to the Company's environmental aspects. The identified requirements are incorporated in the Environmental Management System by drawing up and implementation of relevant Working Instructions or Environmental Management Programs, by informing and training the involved personnel etc.

The Environmental Engineer reviews the compliance of the Plant and Quarries operation with the legal and other requirements applied to them, in regard with the environmental aspects, at least on an annual basis and maintains the relevant records (see Procedure PP.200).

Relevant Procedures

PP.200 Legislation / Regulation Monitoring and Application Compliance

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6. Environmental Objectives, Targets and Programs

The Company establishes and maintains environmental objectives and targets for each aspect, arising from the environmental policy. The analysis and the objectives / targets and relevant measures are approved by the Plant Manager.


Working Instructions and Environmental Management Programs are implemented in order to meet the environmental objectives and targets. The Environmental Management Program is the document in which the specific practices, the resources and the sequence of activities related to a particular project are described. In case it is decided by the Environment Board that a Program must be implemented, a responsible person is appointed. Action plan describes all actions to be done for the Program execution (see Procedure IP.310).

The Company establishes measuring indicators for following up of the progress of the environmental objectives and the measurement of the performance. The environmental performance indicators provide information on the Company's capability and efforts in managing matters such as training, legal and other requirements, resources allocation, environmental cost management, documentation, preventive and correcting actions which have influence on the Company's environmental performance, dangerous materials' handling, equipment etc. (see Procedure IP.300).

The environmental performance indicators and the corresponding targets are defined by the Environment Board and examined during the annual reviews of the Environmental Management System (see Procedure EP.410).

Relevant Procedures

- IP.300 Environmental Aspects
- IP.310 Environmental Management Programs
- EP.410 Management Review

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7. Organization and Responsibilities

The Company's Management provides resources essential for implementation, control and improvement of the Environmental Management System. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

The Company has appointed a Management Representative (Environmental Engineer) who is responsible for:

- ensuring that Environmental Management System requirements are established, implemented and maintained in accordance with the EN ISO 14001:2004 Standard,
- reporting on the performance of the Environmental Management System to the Company's Management for review and as a basis for the improvement of the System, and
- liaising with external parties and associates on matters related to the System.

The Company has also appointed the Environment Board, which is responsible to identify the environmental aspects, to determine the emergency situations and the need for preparation of emergency plans, to review on annual basis the Environmental Management System etc.


Company's organization chart is presented in Appendix A. The Company also provides job descriptions for all positions that are involved in environmental issues and aspects.

It is noticed that for the Construction Phase the role of Plant Manager in the system procedures will be played by the Technical Project Manager as far as the operational issues are concerned, wherever such procedures are applicable.

Relevant Procedures

OP.100 System Organization and Responsibilities

IP.300 Environmental Aspects

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8. Competence, Training and Awareness


The Company's employees are appropriately trained and able to perform their duties in conformance with the Company's Environmental Policy, Objectives and Targets, and the Environmental Management System standards that have been implemented.

The Environmental Engineer, in cooperation with the Plant Management, are responsible for ensuring the competent employees' training and awareness and, in cooperation with the Personnel Department, for determining the requirements of training courses and other awareness programs.

Training needs are identified, programs are planned and implemented. In the end the programs are evaluated and new training needs are identified.

Relevant Procedures

OP.110 Training

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9. Communication

The Company's policy concerning the environment is communicated to persons working for or behalf of the Company, including contractors working at the Company's facilities and is available to interested parties.

The Environmental Engineer is responsible to inform the employees on environmental issues. The employees are informed through:

- discussion / training on specific topics (OP.110 "Training"),
- posted notices on the Notice Board, and
- personal communication.

Employees may inform the Environmental Engineer for environmental issues.

The Environmental Engineer decides, in cooperation with the General Manager the way of communication that will be used by the company for external communication. Any kind of official document, communication with the authorities or written publication concerning the environmental consequences of the Company's activities ought to be documented, in order to be handled properly.

The Company informs suppliers and subcontractors on environmental issues (IP.330).


The Environmental Engineer collects and follows all incoming messages relating to environmental issues (OP.120).

Relevant Procedures

OP.110 Training

OP.120 Communication

IP.330 Suppliers / Subcontractors

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10. Documentation


The Company establishes and maintains a documented Environmental Management System, which includes controlled documents, like:

- Environmental Manual that briefly describes the Environmental Management System and is structured according to the international standard ISO 14001: 2004
- Procedures
- Working Instructions
- Environmental Management Programs
- Emergency Plans
- Other documents of external origin (applicable legislation, permits and licenses, International / European standards and regulations).

A list of the procedures that are included in this Environmental Management System are presented in Appendix B. The document control is described in the next paragraph.

Relevant Procedures

OP.130 System Documentation Management

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11. Document Control

Controlled documents are regulatory documents that give guidance to Company's personnel during the implementation of Environmental Management System activities and describe what must be done, by whom, when, and how it is documented.

For the controlled documents a standard format is used including the document's identification data (type of document, persons having the responsibility for preparation and approval, the revision data etc.).

The Environmental Engineer is responsible for handling controlled documents relating to the Environmental Management System.

The Environmental Engineer keeps:

- The controlled documents in force.
- A copy of the past versions of revised controlled documents, if there is such a need, otherwise he destroys all past versions.


The distributed documents are recorded in the "Distribution List of Environmental Management System Documentation", by the Environmental Engineer.

The controlled documents are reviewed at least once a year during the annual review.

Relevant Procedures

OP.130 System Documentation Management

EP.410 Management Review

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12. Operational Control

Based on the legislative, regulatory and other requirements to which the Company subscribes as well as on the Company's environmental policy, the Environment Board draws up tables of environmental aspects of all the Company's activities.

The Environment Management Board identifies the environmental aspects taking into account current and past activities, planned or new developments, new or modified activities (including purchased materials and activities of suppliers), normal and abnormal operations, shut-down and start-up conditions, as well as reasonably foreseeable emergency situations. For each activity the environmental aspect and impact is recorded and a significance level of each aspect is given.


Decisions are taken about:

- the objectives and targets for each aspect followed by the appropriate control measures and documents;
- the need of drawing up and implementing an Environmental Management Program or, alternatively, of issuing specific Working Instructions and monitoring their implementation;
- the person(s) that will be responsible for the above mentioned actions;
- the measuring indicators (if any) that will be used for follow up of the progress and the measurement of the environmental performance.

The analysis and the objectives / targets and relevant measures are approved by the Plant Manager.

Relevant Procedures

IP.300 Environmental Aspects

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13. Emergency Preparedness and Response

The Environment Board examines the Company's activities and identifies the cases where situations can occur that may lead to events that will have an adverse effect on the environment.

The Company establishes and maintains Emergency Plans, in order to respond effectively to the emergency situations.

In the Emergency Plans the objectives are clearly stated, so that both the duration and the consequences can be minimized.


For effective implementation of the Emergency Plans, training programs of the people involved are performed.

After handling an emergency situation, a report with the facts is prepared by the Emergency Plan team leader. The report is submitted to the Environmental Engineer, who keeps records of the events. The Emergency Plans are reviewed and revised, after the event or on an annual basis, in order to find out any possible improvements.

The Company must periodically inspect and verify the level of the personnel's preparedness for managing emergency situations. This is done by conducting practice drills, in order to test the corresponding Emergency Plan and verify its effectiveness. In case of unsatisfactory results, the Emergency Plan may be revised. The frequency of practice drills is defined in each Emergency Plan.

Relevant Procedures

PP.210 Emergency Preparedness and Response

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14. Monitoring and measurement

The Environment Board reviews all the Company's activities that may have a significant environmental impact, draws up a list of environmental aspects, records environmental impacts and sets the respective environmental objectives and targets.

The Company, through the managers, Heads of Sections etc. audits and proceeds with the appropriate actions (Non-Conformity Reports, corrective and preventive actions etc).


In order to measure and monitor its environmental performance, the Company has defined appropriate environmental performance indicators (see Procedure IP.300).

Measuring and test equipment used in environmental measurements are checked, maintained and calibrated according to relevant Instructions by the Company's personnel or, where this is not possible, by external specialists such as laboratories or manufacturers.

The condition of any measuring and test equipment, as far as proper function and calibration are concerned, is mentioned on an appropriate label on the equipment (see Procedure PP.220).

Relevant Procedures

- PP.220 Handling of Measuring Equipment
- IP.300 Environmental Aspects
- EP.400 System's Internal Audits
- EP.410 Management Review

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15. Non-conformities, Corrective and Preventive Actions

The Company has established a Procedure for recording, monitoring and handling of non-conformities, as well as of the corresponding corrective and preventive actions following a non-conformity or covering any potential ones.

Anyone of the Company's employees that will detect a non-conformity has to report it to one of the responsible persons, as mentioned in the relevant procedure.

The non-conformities identified are communicated immediately to the Plant Manager and the General Manager, who, if they evaluate them to be of significance, direct the Environmental Engineer to further investigate the issue


The Environmental Engineer, in cooperation with the supervising / responsible persons investigates the cause of the problem and defines the corrective - preventive actions to be taken, as well as the due time and person(s) responsible for implementation.

The responsible person(s) for implementation proceeds to all necessary actions, which are recorded. Results of these actions are also recorded.

Preventive actions are also possible for improvements of the Environmental Management System, irrespective of a non conformity (see Procedure IP.320).

Relevant Procedures

IP.320 Non-Conformities Management: Corrective and Preventive Actions

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16. Environmental Management System Records

Records are documents / forms used for the registration of activities during the implementation of the Environmental Management System. These documents / forms are described, filled in, signed and maintained as it is mentioned in the relative Procedures, Working Instructions etc. of the Environmental Management System.

These records may be in printed or electronic form.


The Procedures of the Environmental Management System describe the way that records are kept and the persons responsible for keeping them.

The Environmental records are legible, identifiable and traceable to the activities involved.

Relevant Procedures

OP.130 System Documentation Management

All Procedures and Working Instructions

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17. Environmental Management System Internal Audit

At the end of each year an audit plan is prepared for the next year, taking into consideration the status and importance of the processes and areas to be audited, the risk associated with the failure of the various elements of the Environmental Management System, the environmental importance of the operations concerned, as well as the results of previous audits.

All Company activities regarding the environment are audited at least once per year.

During the audit, the auditor records his comments, if they exist, using the Procedure IP.320 "Non-Conformities Management: Corrective and Preventive Actions" that is applied in such occasions.


All audit reports are communicated by the auditor to the Environmental Engineer and the results of the internal audit are discussed in the Management Review.

Relevant Procedures

IP.320 Non-Conformities Management: Corrective and Preventive Actions

EP.400 System's Internal Audits

EP.410 Management Review

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18. Environmental Management System Review

An annual review of the Environmental Management System is performed, in order to ensure its continuing suitability, adequacy and effectiveness and accomplish the System objectives. The regular review meeting of the Environmental Management System is carried out on a date arranged by the Environmental Engineer.

The standard issues of the review meeting are the following:

- the assessment of progress made to address pending issues from the previous review,
- the setting of new objectives.

An exceptional review meeting is called:

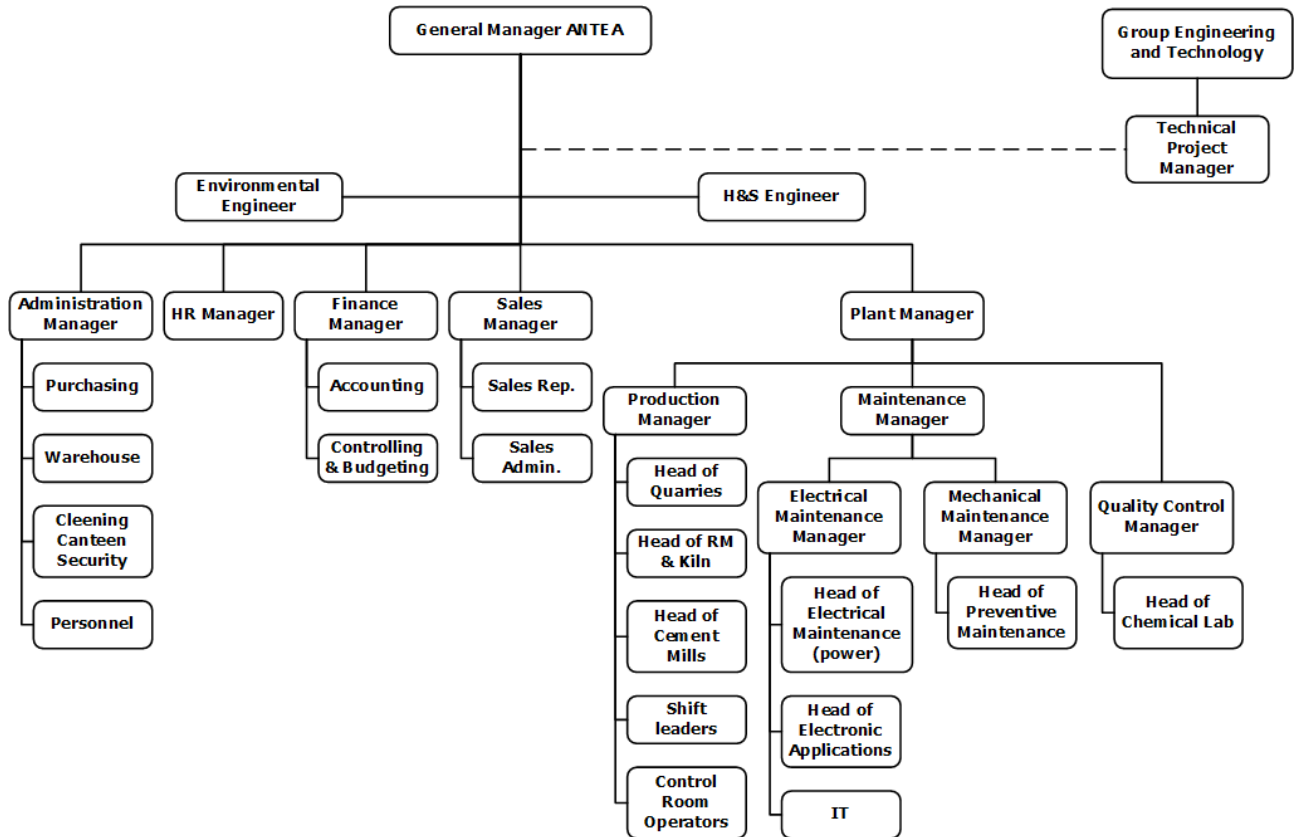
- following the Environmental Engineer's initiatives, in case of:
 - plans and recommendations concerning the changes in the Plant's organizational and/or functional structure, which will result in the re-assignment of responsibilities and duties,
 - detection of deficiencies in the applied system,
 - problems in the Environmental Management System,
 - changes / amendments in the legislation, which may affect and/or modify the Plant's Environmental Management System policy.
- by the General Manager or the Plant Manager for issues that in his judgment may affect the Plant's Environmental Management System.


Any decided required actions are scheduled and those responsible for their implementation are appointed. The Environmental Engineer is responsible for follow up of the decisions taken and for keeping the relevant records.

Relevant Procedures

EP.410 Management Review

Appendix A: Company's organization chart



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Appendix B: List of Procedures

Category 1: Organization Procedures (OP)

- OP.100 System Organization and Responsibilities
- OP.110 Training
- OP.120 Communication
- OP.130 System Documentation Management

Category 2: Planning Procedures (PP)

- PP.200 Legislation / Regulation Monitoring and Application Compliance
- PP.210 Emergency Preparedness and Response
- PP.220 Handling of Measuring Equipment

Category 3: Implementation Procedures (IP)

- IP.300 Environmental Aspects
- IP.310 Environmental Management Programs
- IP.320 Non-Conformities Management: Corrective and Preventive Actions
- IP.330 Suppliers / Subcontractors

Category 4: Evaluation Procedures (EP)

- EP.400 System's Internal Audits
- EP.410 Management Review