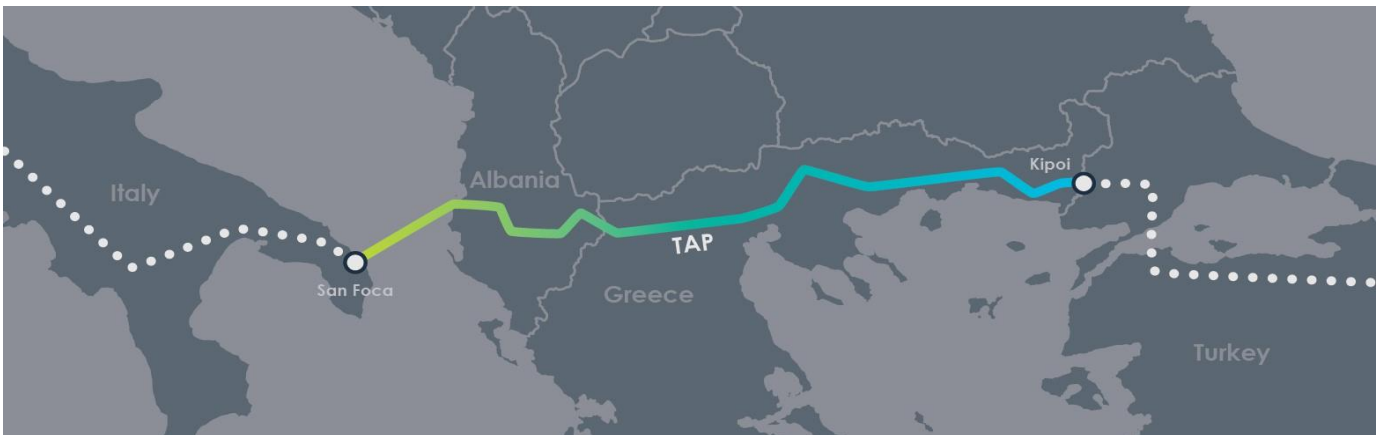




Trans Adriatic
Pipeline



Waste Control Procedure



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1. Introduction

This Waste Control Procedure describes the requirements and best practices for the minimisation and management of TAP AG operations waste to be implemented by TAP AG and its Operations and Maintenance (O&M) Contractor(s) to ensure compliance with commitments and standards and applicable national and EU legislation.

This procedure is subordinate to and shall be read in conjunction with TAP AG Environmental and Social Management Manual (Ref. 1), which provides an overview of all TAP AG environmental, socio-economic and cultural heritage aspects and how impacts are identified, avoided, mitigated or managed in accordance with TAP AG commitments and TAP Operations Environmental Standards (Ref. 2).

This document contains requirements in addition to any legal requirements applicable to TAP AG (arising from national and/or EU legislation and the ESIA approvals in place), and therefore no such provision has any effect whatsoever on the fulfilment of these legal obligations by TAP AG. This document includes additional requirements formulated by, and incumbent on, TAP AG and, therefore, does not give any right to third parties and are not enforceable by any third party beyond any legal rights they may have in accordance with applicable laws.

1.1 Scope

This procedure is applicable to the following TAP AG-owned and operated facilities in Greece, Albania and Italy:

- Pipeline right of way (550 km) from the border between Greece and Turkey in Kipoi up to the border between Greece and Albania, including the compressor station at Kipoi and 23 block valve stations
- Pipeline right of way (215 km) from Qendër, Bilisht in Korçë to 17 km north-west of Fier, approximately 400 m inland from the shoreline, the compressor station near Fier, the metering station near Bilisht, 8 block valve stations and 1 landfall valve station
- Pipeline right of way (105 km) pipeline traversing the Adriatic Sea to the Italian coast, the micro-tunnel site near the town of San Foca, the landfall valve station, the pipeline right of way (8.2 km), Pipeline Receiving Terminal (PRT) and back-up control centre in Brindisi.

This procedure applies to TAP AG and O&M contractors undertaking work within TAP AG operational facilities listed above, who are responsible for minimising the generation of waste, its handling and segregation onsite, its transportation and final disposal. It includes both non-hazardous and hazardous wastes generated by TAP AG operations.

This document shall take effect from the commencement of commercial operations and shall supersede the previous construction-phase TAP Waste Management Plan and Waste Management Contractor Control Plans .

The management of waste in TAP AG's offices is subject to separate procedures referenced in Section 2.0 of this document (Ref. 3-5).

1.2 Purpose

The purpose of this procedure is to guide the waste management process that shall be implemented and used as part of the TAP AG QHSE system.

The objectives of this document are:

- to outline the safeguards for ensuring the comprehensive control of waste, through the systematic application of the waste hierarchy, waste minimisation, waste identification



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and segregation, collection, handling and storage, waste transfer/transportation, reuse and recycling and disposal of wastes to be applied across the TAP AG facilities outlined in Section 1.1

- to outline required waste minimisation and management controls
- to detail the TAP AG waste management compliance monitoring process
- to meet TAP AG’s commitments from the approved TAP Environmental and Social Impact Assessments (ESIA) for Greece, Albania and Italy (Ref. 6-8), including subsequent approved amendments.

1.3 Abbreviations and Definitions

Abbreviation	Definition
CCP	Contractor Control Plan
ESIA	Environmental and Social Impact Assessment
EWC	European Waste Catalogue
IMO	International Maritime Organisation
QHSE	Quality, Health, Safety, and Environment
QHSE MS	Quality, Health, Safety, and Environmental Management System
SDS	Safety Data Sheets
NCR	Non-conformance report
O&M	Operations and Maintenance
PPE	Personal Protective Equipment
RENTRI	Italy National Electronic Register for Waste Traceability
STP	Sewage Treatment Plant
TAP AG	Trans Adriatic Pipeline AG
UoM	Unit of Measurement
WEEE	Waste electrical and electronic equipment
WTN	Waste Transfer Note

Term	Definition
Competent Authority	Any person or organisation that has the legally delegated or invested authority, capacity, or power to perform a designated function, such as a national ministry, a regional authority, a local council, or another public or private body that has been nominated and approved by the national government
Hazardous waste	Any industrial by-product that is destructive to the environment, flora or fauna or dangerous to public health, as defined by applicable legislation and displays one or more of the hazardous properties listed in Annex III of EU Directive 2008/98



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Term	Definition
Non-hazardous waste	Any industrial by-product that is not destructive to the environment, flora or fauna or is not dangerous to public health and is not covered by the Hazardous Waste definition above
TAP employee	Personnel under a direct employment contract with TAP AG
Waste	Any substance (solid or liquid) or object that belongs to a category of waste specified in the European Waste Catalogue, whose holder discards or intends, or is required to discard, and anything to be discarded, or otherwise dealt with, as if it were waste, shall be presumed to be waste until the contrary is proved.
Waste management	The system of waste segregation, collection, transport, recovery and disposal, including the supervision of such operations.
Waste Producer	Anyone whose activities produce waste (original waste producer) or anyone who carries out pre-processing, mixing or other operations resulting in a change in the nature or composition of this waste.
Waste Transporter	Subcontractor(s) to O&M Contractor(s) responsible for transporting waste from TAP AG facilities to waste receiver facilities
Waste Receiver	Subcontractor(s) to O&M Contractor(s) receiving waste from waste transporter and undertaking the recovery, recycling or disposal of waste.

1.4 Roles and Responsibilities

TAP AG organisation, with headquarters in Switzerland, includes roles such as the Operations Director, who shall support the roles and responsibilities presented below.

1.4.1 Operations and Maintenance Country Manager

Environmental Management of hot commissioning activities, the introduction of hydrocarbons and the operation and maintenance of the TAP pipeline systems in each host country has been delegated to Operations and Maintenance Country Manager(s), who shall be responsible for:

- Ensuring compliance with and implementation of TAP AG standards and QHSE Management system, including applicable environmental and urban and land planning legislation, Lenders and ESIA requirements, and the implementation of practices for the prevention of pollution and management of waste
- Ensuring implementation of the waste minimisation and management controls outlined in Section 3 of this procedure.

1.4.2 TAP AG QHSE Officer

The QHSE Officer shall be responsible for:

- Preparation, implementation, periodic review and update of this procedure to ensure consistency with the TAP AG operations.
- Supporting TAP’s Permitting Team in making applications for waste permits or registration with competent authorities, if necessary



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- Identification and classification of waste produced by the TAP AG worksites as per Section 3.3 of this procedure
- Supporting selection and assessment of waste contractors in Albania and waste subcontractors proposed by O&M Contractor(s) in Greece and Italy as part of the TAP AG approval process
- Conducting assessments of the Waste Contractor in Albania and O&M Contractors' waste subcontractors in Greece and Italy engaged in the transportation, receipt and off-site reuse, recycling, recovery, treatment and disposal of waste, and generation of Waste Facility Inspection Reports as per Section 3.2 of this procedure
- Maintaining waste tracking, recording and recording documentation as per Section 3.6 of this procedure.
- Undertaking compliance monitoring as per Section 3.4.4 of this procedure and reporting results to the TAP AG management.
- Recording and reporting waste-related incidents
- Providing training and guidance to TAP AG personnel on waste management and minimisation requirements
- Compiling annual statistics on waste management performance and presenting them to TAP AG management.
- External waste reporting to relevant competent authorities as required under national legislation
- Carrying out analysis of the waste performance data (including review of recycled and reused waste volumes and proportions) and making necessary recommendations for improvement.

1.4.3 O&M Contractor in Greece and Italy and Waste Contractor in Albania

TAP Operations and Maintenance Contractor(s) in Greece and Italy and the Waste Contractor in Albania, shall be responsible for:

- Acting in accordance with the relevant Maintenance contract in Greece and Italy / Waste Contractor in Albania, in relation to waste management, and this procedure
- Ensuring full compliance by all personnel (and waste subcontractors' personnel in Greece and Italy) with the provisions of this procedure and applicable national legal requirements
- Pre-qualification of waste management subcontractors prior to selection and contractual agreements being put in place
- Uploading valid waste management licenses in Albania and waste subcontractor licences in Greece and Italy into AGORA
- Include waste management subcontractor audits in annual audit plans and provide copies of audits to the TAP AG Officer upon request
- Providing necessary information to the TAP QHSE Officer in relation to waste streams produced or expected to be generated at the TAP AG worksite to support the identification and classification of waste
- Reporting every month to the TAP QHSE Officer on the volumes of waste generated, stored onsite and removed offsite. The format of the waste report is provided in Appendix 6.



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1.4.4 All TAP AG and O&M Contractor Personnel

Personnel have a responsibility to segregate, handle and dispose of all waste generated in line with this procedure and shall:

- Follow waste segregation and handling requirements outlined within Section 3.3-3.5 of this procedure
- Promptly report all faulty/defective (i.e. non-compliant with this procedure) waste collection or storage equipment to the QHSE Officer
- Contact the QHSE Officer or the designated O&M Contractor person (as the case may be) in the event of encountering unidentified waste or when unclear on segregation and disposal requirements.
- Follow health and safety precautions specified within Safety Data Sheets (SDS) when handling hazardous waste.

1.4.5 Waste Receiver(s) and Waste Transporter(s)

Subcontractor(s) to O&M Contractor(s) in Greece and Italy and Waste Contractor in Albania transporting waste from TAP AG facilities or receiving waste generated by TAP AG facilities shall follow the requirements of applicable European and national legislation. Each waste transporter and receiver shall provide:

- A copy of the waste documentation (i.e. waste transfer note) for each consignment transported and received from a TAP AG worksite, acknowledging transportation and receipt of the waste
- A copy of the permit or licence from the relevant competent authority or evidence of registration in the relevant register of a national authority authorising them to transport, receive, process and dispose of waste streams received from TAP AG worksites.

Upon request by TAP AG, each waste transporter shall provide documented evidence that its waste-transporting vehicles comply with the requirements of applicable European and national legislation.

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2. References

No	Document title	Document Number
1	Environmental and Social Management Manual	CAL00-TAP-QHSE-Y-TMT-0001
2	TAP Operations Environmental Standards Manual	CAL00-TAP-QHSE-Y-TMT-0002
3	Office Waste Management Procedure (Albania)	AAL00-TAP-QHSE-Y-TPA-0001
4	Office Waste Management Procedure (Baar, Switzerland)	CAL00-TAP-QHSE-Y-TPA-0011
5	Office Waste Management Procedure (Greece)	GAL00-TAP-QHSE-Y-TPA-0001
6	TAP Greece Environmental and Social Impact Assessment	GAL00-ENT-642-Y-TAE-0001
7	TAP Albania Environmental and Social Impact Assessment	AAL00-ENT-641-Y-TAE-0001
8	TAP Italy Environmental and Social Impact Assessment	IAL00-ERM-643-Y-TAE-1011
9	Pollution Prevention Procedure	CAL00-TAP-QHSE-Y-TPA-0001
10	Non-Conformity Management Procedure	CAL00-TAP-QHSE-X-TPA-0002
11	QHSE Training Procedure	CAL00-TAP-QHSE-X-TPA-0006
12	Waste and Resource Consumption Minimisation Procedure	CAL00-TAP-QHSE-Y-TPA-0016
13	Records Retention Guidelines	CAL00-TAP-LEG-X-TPA-0001
14	QHSE Management System Manual	CAL00-TAP-QHSE-X-TMQ-0002



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3. Waste Control Procedure

The process of TAP AG waste control is presented in Figure 1 below. Further details on the process are provided in Sections 3.1 – 3.6 of this procedure.

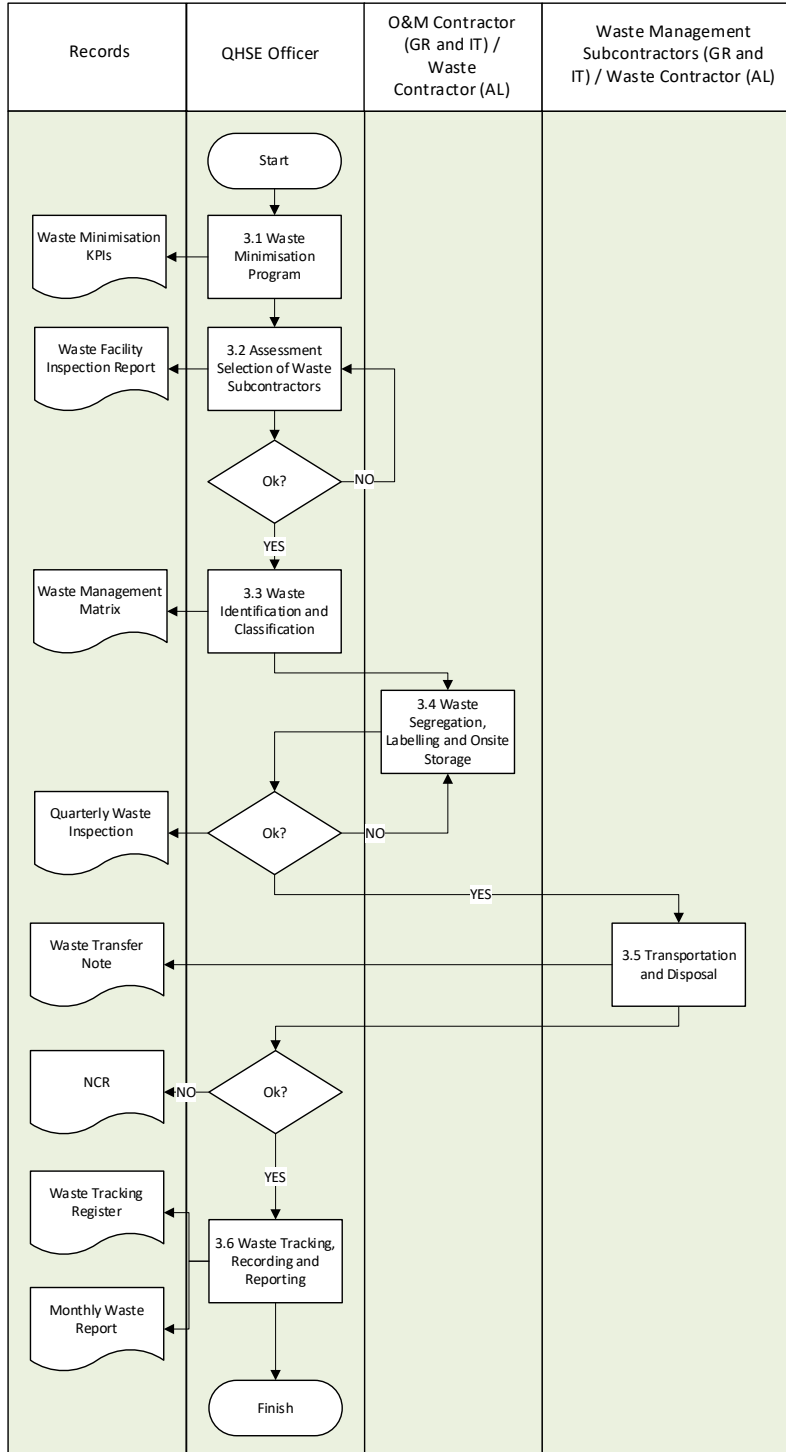


Figure 1 Waste Control Process



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3.1 Waste Minimisation Program

TAP AG Operations shall adopt TAP AG’s Waste Management Hierarchy (Figure 2), that preferentially avoids or minimises waste generation at source to reduce its harmfulness as much as possible, as well as reducing the quantity of waste disposed of to landfill or other final methods of disposal.

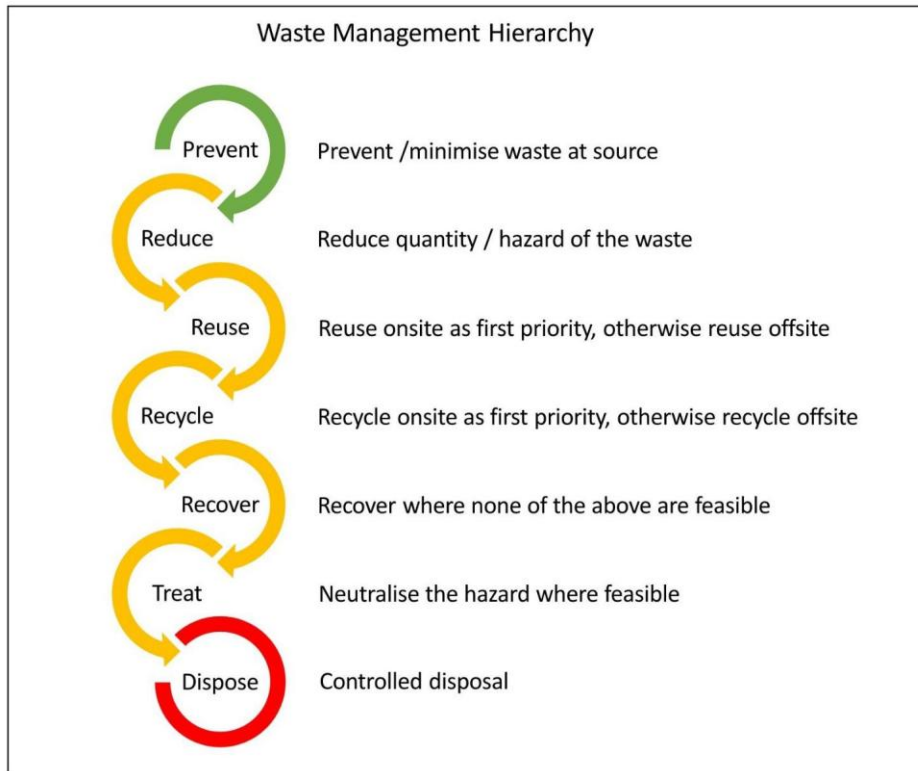


Figure 2 TAP Waste Management Hierarchy

TAP AG has developed and implemented the Waste and Resource Consumption Minimisation Procedure (Ref. 12) in line with the Waste Management Hierarchy, to reduce waste production through better use of resources and more sustainable consumption patterns. The waste minimisation programme shall be based on the following principles:

- alignment of procurement practices, including product and/or reusable packaging specifications and return of surplus materials to vendors
- provision of employee training and awareness programs on the maximisation of onsite and offsite waste segregation and minimisation opportunities and benefits
- where practical use of onsite waste minimisation techniques, such as de-watering, crushing, composting, etc. to reduce volumes and waste transportation frequencies
- preventive maintenance program for vehicles and equipment at established frequencies
- continual exploration of opportunities onsite and offsite to reuse and recycle wastes and reduce the amount of waste sent for disposal.



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Waste and Resource Consumption Minimisation Procedure (Ref. 12) establishes waste and consumption reduction initiatives for implementation in countries of operation.

As part of the QHSE induction, all TAP AG employees shall be made aware of waste segregation, handling and disposal requirements outlined within this procedure, including:

- Roles and responsibilities of everyone
- Identification and segregation of the different waste streams
- Identification of risks associated with handling hazardous wastes
- Personal protective equipment requirements
- Safety Data Sheets (SDS) precautions
- Reporting of unidentified waste

Training and awareness-raising shall be conducted in accordance with the QHSE Training Procedure (Ref. 11).

O&M Contractor(s) shall be responsible for providing relevant training to their personnel and ensuring that their subcontractors provide the same.

3.2 Assessment and Selection of Waste Management Contractors and Subcontractors

In Greece and Italy, the O&M Contractor shall establish service agreements with subcontractors engaged in the transportation, receipt and off-site reuse, recycling, recovery, treatment and disposal of waste. In Albania, TAP AG shall establish such a service agreement.

These waste subcontractors in Greece and Italy and the Waste Contractor in Albania, shall be subject to a prequalification assessment based on:

- due diligence checks, including checks on the availability and validity of relevant permits and licences
- technical capacity and capability to provide the relevant waste transportation and disposal service in a manner compliant with TAP AG's standards.

All waste management subcontractors in Greece and Italy and the Waste Contractor in Albania, shall be registered in AGORA so that valid licenses can be uploaded periodically. Audits of waste management subcontractors in Greece and Albania shall be included in O&M Contractor annual audit plans, with copies of the reports provided to TAP AG upon request.

Waste transporters and waste receiving facilities engaged in providing waste management services to TAP comply with the waste documentation requirements outlined in Section 3.6 of this procedure.

Vehicles of the waste transporters shall hold appropriate certification under national legislation to carry the given waste streams and shall be:

- appropriate for the waste being transported
- equipped to prevent leaks or spills
- covered to prevent loss of wastes during transit.

The suitability and sufficiency of O&M Contractors' / Waste Contractor's internal and external waste management resources shall be assessed by the TAP AG every three (3) years to assess their ongoing compliance with TAP AG's standards using the Waste Transporting and Receiving Facility Inspection Checklist provided in Appendix 1.



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In the event of non-compliance with this procedure, the QHSE Officer shall record the corresponding non-conformity in accordance with the Non-Conformity Management Procedure (Ref. 10).

3.3 Waste Identification and Classification

The TAP QHSE Officer shall develop an individual facility Waste Management Matrix (template for which is provided as Appendix 2) detailing waste streams generated from each worksite.

The Waste Management Matrix shall be developed by the TAP QHSE Officer (with input from the O&M Contractor(s) and the TAP Operations team) and reviewed and revised quarterly to reflect any new waste streams generated at the worksite.

Waste streams shall be identified using the EWC 6-digit code and classified depending on the degree of health and environmental hazard into:

- Hazardous wastes
- Non-hazardous wastes

Furthermore, the classification of waste shall take into account the waste classification stipulated in the European (e.g., EWC) and national legislation of the country of operation. Approximate annual quantities of expected waste streams shall be estimated in the individual facility Waste Management Matrix to enable planning of temporary onsite storage, transportation, and disposal arrangements.

3.4 Waste Segregation, Labelling and Onsite Storage

Waste collection, storage, and labelling practices shall comply with the applicable European and national legislation, as well as with the TAP AG requirements outlined in this section.

3.4.1 Waste Segregation

Across all TAP AG facilities (listed in Section 1.1), waste management shall be controlled at all times, especially for wastes that may pose a hazard to the safety and health of workers or the environment. Both TAP AG and the O&M Contractor(s) shall be responsible for depositing waste in the appropriate collection containers and for preventing mixing of waste streams (e.g., plastic and paper) within those containers.

The TAP QHSE Officer shall record in the facility Waste Management Matrix (template for which is provided in Appendix 2) the details of segregation and storage arrangements for each waste stream. Wastes that are not disposed of in skips or containers shall be suitably packaged in accordance with the Waste Management Matrix to facilitate loading and safe onward handling.

The process shall aim for 'at-source' segregation with the objectives to:

- eliminate potential health and environmental hazards associated with the storage and handling of mixed incompatible wastes
- enable further reuse and recycling of wastes to the maximum
- comply with TAP standards and legislative requirements for waste handling and temporary storage.

In the event a worker is unable to classify a waste stream, he/she shall contact the TAP QHSE Officer or designated O&M Contractor representative (as the case may be) for guidance.

3.4.2 Waste Labelling

Each waste collection and temporary onsite storage container, and each temporary waste storage area, shall be labelled in the host country language and in English. The labels shall be legible and indicate the contents of the container according to the EWC, known hazards and pictograph. Each facility may elect to apply a



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colour-coding system to waste containers in addition to labelling; this will be decided individually for each facility.

3.4.3 Onsite Temporary Waste Storage

On-site temporary storage of waste pending collection shall meet applicable European and national regulatory requirements regarding maximum storage periods, maximum volumes, and packaging requirements. These shall be detailed for each waste stream within the worksite Waste Management Matrix (Appendix 2).

Waste shall be disposed of only into approved waste containers and stored within temporary onsite waste storage facilities, which shall be designed to meet the requirements of applicable European and national legislation and standards and shall meet the requirements detailed below:

- Locations of waste storage facilities shall minimise the exposure of workers to waste
- The deployed number of waste containers and the size of temporary onsite waste storage areas shall be commensurate with the volumes and streams of wastes generated based on experience from operating other facilities.
- The design of the temporary waste storage facilities shall account for:
 - the prevention of ground pollution, including safeguards such as impermeable surface, use of secondary containment (up to 110% capacity) for liquid wastes
 - vehicular access
 - weather protection, e.g. to prevent exposure to sun, filling of the bunding with rainwater, dislodging containers due to high winds, etc.
 - Adequate dimensions to allow for segregation of incompatible hazardous wastes according to the SDS of the stored waste streams
 - Signage, demarcation and correct labelling of all storage areas and containers
 - SDS for hazardous substances that have become waste in the host country language and English
 - Fire prevention and emergency response arrangements (PPE, extinguishers, spill kits, eye wash station, etc.)
 - envisaged use of waste compacting, composting and crushing equipment
 - restriction of unauthorised access.

The TAP QHSE Officer shall develop a Waste Collection and Storage Map for each facility, identifying dedicated waste collection and temporary onsite waste storage areas.

In Greece and Albania, a dedicated, separate 'quarantine' area within temporary waste storage areas shall be provided for unidentified waste pending further assessment and investigation by the TAP QHSE Officer. Until waste is identified and the TAP QHSE Officer confirms its classification, such waste shall remain within the quarantine area as hazardous waste. The TAP QHSE officer shall review the Waste Collection and Storage Map annually to ensure that any changes to waste storage facilities or arrangements are reflected in it.

In Italy, any unidentified waste shall be assigned a preliminary EWC code pending any confirmation by dedicated test reports and placed in a dedicated container that identifies the EWC code and the waste producer in the temporary storage areas (A3a for non-hazardous waste and A3b for hazardous waste).



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Collection and storage of wastes on-board vessels engaged in the provision of services to TAP facilities shall be managed in accordance with this procedure, TAP Operations Environmental Standards (Ref 2.) and as outlined in Annexes IV and V of MARPOL 73/78 and relevant IMO circulars.

3.4.4 Onsite Compliance Monitoring

Every 6 months, the TAP QHSE Officer shall conduct a planned Waste Management Inspection to review worksite waste management practices and storage arrangements to assess compliance with this procedure. The inspection checklist format is provided in Appendix 3.

3.5 Waste Transportation and Disposal

3.5.1 Waste Transportation

Waste removed from TAP AG facilities shall be transported only by licensed subcontractor(s) to O&M Contractor(s) in Greece and Italy and a licensed Waste Contractor in Albania following their assessment and approval by TAP AG as outlined in Section 3.2 of this procedure. TAP AG waste shall be delivered only to waste-receiving facilities that are licensed to receive, process, and dispose of the received waste stream.

The frequency of waste collection and transportation to minimise health and safety and environmental hazards associated with the accumulation of certain waste streams shall be established by the TAP QHSE Officer in accordance with applicable legislation. The TAP QHSE Officer shall engage O&M Contractor(s) in Greece and Italy / Waste Contractor in Albania to arrange the removal of waste from TAP AG's temporary onsite waste storage areas.

The vessel operator shall manage all the wastes generated by vessels in compliance with the relevant host country legislation and MARPOL 73/78.

The TAP QHSE Officer shall record and maintain details of transportation and disposal arrangements for each waste stream produced at each TAP AG worksite in the worksite Waste Management Matrix (Appendix 2).

The O&M Contractor in Greece and Italy / Waste Contractor in Albania shall ensure that the following documentation accompanies each waste consignment collected by the waste transporter:

- Authorisation as waste producer, if so required.
- Valid waste transporter license and vehicle certification
- Waste Transfer Note as detailed in Section 3.6.1
- SDS for hazardous waste
- Any other documentation that may be required under the national legislation of the country of operation.

The O&M Contractor in Greece and Italy / Waste Contractor in Albania shall be responsible for providing the TAP QHSE Officer with a copy of the waste transfer form, with the waste receiver acknowledging acceptance of the stated volume and each waste stream from the waste transporter.

Where no hazardous waste treatment facilities are available in the host country, the waste is to be transferred to the licensed holding facility for further transportation in line with the requirements of the Basel Convention on Transboundary Movement of Hazardous Wastes and the applicable EU and national legislation.

3.5.2 Management of Specific Waste Streams

The following general principles shall apply to TAP AG facilities listed in Section 3.1 in relation to the management of specific waste streams where applicable:



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- Contaminated soil arising from hydrocarbon spills: any proposed treatment methodologies are subject to approval by TAP AG and authorisations (as the case may be) pursuant to the applicable legislation
- Specific hazardous wastes: such wastes (e.g. radioactive, asbestos, explosive, etc.) shall be handled and disposed of in line with national legislation of the host country and TAP Operations Environmental Standards (Ref. 2), whichever is more stringent, with engagement of a specialist subcontractor and TAP AG approval for disposal methodology
- Medical waste is handled by trained medical personnel, and licensed facilities are engaged for disposal in accordance with the national legislation of the host country
- Hazardous liquid waste arising from site activities such as maintenance, vehicle wash-down, is either:
 - treated on site to TAP Operations Environmental Standards (Ref. 2) at a permitted location or
 - to be transported for treatment and disposal by a licensed subcontractor

Where no liquid hazardous wastewater treatment facilities are available in the host country, the waste shall be transferred to the licensed holding facility for further transportation in line with the requirements of the Basel Convention on Transboundary Movement of Hazardous Wastes and the applicable EU and national legislation.

Drainage water and bilge water onboard vessels shall be collected, treated, and discharged in line with provisions of TAP Operations Environmental Standards (Ref. 2) and MARPOL 73/78 Annex I.

- Sewage and grey water: disposal of domestic sewage from onshore and offshore facilities is handled via the following options, whichever proves the most feasible for each site and subject to being permitted under applicable legislation:
 - direct connection to or transfer via tankers to the existing municipal sewage network
 - treatment to TAP AG Operations Environmental Standards (Ref. 2) and as per regulatory requirements by an onsite sewage treatment plant (STP) and permitted discharge into the environment
 - collection in septic tanks and transfer via tankers to a licensed wastewater treatment facility

Where an on-site STP is to be used, its design, discharge monitoring and maintenance requirements shall comply with TAP Pollution Prevention Procedure (Ref. 9).

In cases where the collection and storage of untreated sewage and grey water onboard vessels is not feasible and occasional limited discharge is required, such discharges shall be undertaken in line with the provisions of TAP Operations Environmental Standards (Ref. 2) and requirements of Annex IV and V of MARPOL 73/78.

- Sewage sludge is to be collected and transported by vacuum tanker for disposal at a licensed facility. Proposals for alternative disposal methods shall be subject to approval by TAP AG and applicable legislation
- Ballast water: project vessels shall de-ballast in accordance with TAP AG Operations Environmental Standards (Ref. 2) and the requirements of IMO Guidelines. The discharge of any water collected from outside the Mediterranean Sea shall be avoided



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The details of the waste management options applied for each waste stream shall be recorded in the worksite Waste Management Matrix (Appendix 2). The worksite Waste Management Matrix shall remain a 'live' document continuously updated as new activities commence, new waste streams are generated, and new third-party waste facilities and management options emerge.

3.6 Waste Recording and Reporting

3.6.1 Waste Recording

The QHSE officer shall track the movement of waste from generation to delivery at the receiving facility by implementing a chain-of-custody documentation system.

Mixed municipal waste collected in waste storage containers (outside of the GCS00 permitter fence in Greece and within the PRT boundary in Italy) and removed by the municipality shall be exempt from the requirements of this Section.

Where national legislation prescribes the format of the waste chain of custody documentation, the form prescribed by that legislation shall be used. Where no such format is provided by national legislation, the Waste Transfer Note (WTN), the template for which is provided in Appendix 4, shall be used.

In Italy, since the adoption of the Ministerial Decree 4 April 2023, No. 59, regulating the implementation of the RENTRI System (National Electronic Register for Waste Traceability) in compliance with Article 188-bis of Legislative Decree No. 152/2006 (Environmental Code) and Legislative Decree No. 213/2022, the waste recording and reporting must follow the requirements applicable both to producers, intermediates, transporters and receivers.

The O&M Contactor(s) shall ensure that:

- Any movement of waste from a temporary onsite waste storage area or any other point of waste collection by a waste transporter is accompanied by a WTN, supplemented by MSDS for hazardous waste consignments, and any other documentation required under national law
- Relevant sections of the WTN are completed by TAP AG as the waste producer, by the waste transporter(s) and the waste receiver(s). A triplicate document shall be used, allowing each party to retain a copy.

The TAP QHSE Officer shall additionally maintain the following documentation:

- An electronic Waste Tracking Register, the template for which is provided as Appendix 5, containing information collated from the WTNs. The Waste Tracking Register shall be updated on a monthly basis and shall include the following as a minimum:
 - waste stream and EWC waste code
 - consignment date
 - quantity of transferred waste
 - ID number of WTN accompanying the waste shipment
 - Waste transporter
 - transporting vehicle registration
 - destination of waste shipment
 - Waste management option applied as per Waste Management Matrix.



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All contractor vessels engaged in the provision of services to TAP AG operational facilities shall maintain the following additional waste management documentation as required by IMO Circular FAL.2/Circ.127 dated 1 July 2013, as amended, namely:

- Garbage Management Plan and Garbage Record Book (required by MARPOL Annex V)
- International Sewage Pollution Prevention Certificate and detailed logs of overboard discharges associated with the above (required by MARPOL Annex IV) - all vessels with a marine sanitation device.

In addition to the above, all vessels of 400 gross tonnage and above shall carry:

- International Anti-fouling System Certificate and Anti-fouling Declaration (required by AFS Convention Annex 4)
- Ballast Water and Sediment Management Plan, Ballast Water Record Book and an International Ballast Water Management Certificate (required by Ballast Water Convention) and detailed logs of associated overboard discharges.

The TAP QHSE Officer shall verify the availability of relevant vessel documentation upon the hire of new vessels for TAP AG operations.

3.6.2 Waste Reporting

The QHSE Officer shall be responsible for producing a Monthly Waste Report, the template for which is provided as Appendix 6. The Waste Report to TAP operations management shall summarise the performance of TAP AG worksites in waste management and minimisation. The Monthly Waste Report shall include volumes of wastes generated, stored and removed offsite by TAP O&M Contractors in Greece and Italy / Waste Contractor in Albania. On an annual basis, TAP operations management shall review waste reporting information to promote the implementation of the waste hierarchy.

Where required by applicable national legislation, the QHSE Officer shall also provide waste reports to competent authorities in the formats required by local legislation in the country of operation (e.g. RENTRI reporting system in Italy).

Waste management compliance indicators shall be reported in accordance with Appendix 1 of the ESMM (Ref. 1).



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4. Risk Assessment

N/A



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5. Records

Record	Document Code/Number	Generated By	Resp. To Store	Storage Method	Location	Storage Period Prior to Disposition
Copies of licenses or permits and certification for all waste transporters and waste receivers	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Copies of waste transfer notes signed by waste transporters and waste receivers	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Waste Management Matrix	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Waste Management Map	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Waste Tracking Register	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Facility Waste Inspection Reports	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
Waste Management Contractor / Subcontractor Inspection Reports	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
External waste inspection reports by competent authorities (if any)	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)
External waste reports to	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention



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Record	Document Code/Number	Generated By	Resp. To Store	Storage Method	Location	Storage Period Prior to Disposition
competent authorities						Guidelines (Ref. 13)
Internal monthly waste reports	N/A	QHSE Officer	QHSE Officer	Electronic / Hard copy	TAP Facility	In accordance with Records Retention Guidelines (Ref. 13)



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6. Changes Since Last Revision

Summary of Changes (Brief)	Section	Page
Document title changed from 'Waste Control Procedure' to 'Waste Management Procedure'	All	All
List of facilities updated	1.1	3
Abbreviations and Definitions updated	1.3	4
Figure 1 updated for alignment with roles and responsibilities	3	9
The term 'Material Safety Data Sheet (MSDS)' has been replaced with the term 'Safety Data Sheet (SDS)' throughout the document.	All	All
Requirement for a waste quarantine area revised for Italy	3.4.3	13
Requirements to follow RENTRI system in Italy added	3.6.1	16
Changes made to reflect direct waste contractor arrangements for TAP operations in Albania	All	All
New section 4 Risk Assessment added for compliance with new document template requirements	4	18
Records section updated	5	19-20
Appendix 6 Monthly Waste Report Template updated	Appendix 6	-



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7. List of Appendices

Appendix 1 Waste Transporting and Receiving Facility Inspection Checklist (see separate file on PIMS)


Appendix 2 Waste Management Matrix Template (see separate file on PIMS)


Appendix 3 Waste Management Inspection Checklist (see separate file on PIMS)


Appendix 4 Waste Transfer Note Template (see separate file on PIMS)


Appendix 5 Waste Tracking Register Template (see separate file on PIMS)


Appendix 6 Monthly Waste Report Template (see separate file on PIMS)

 Waste Transporting and Receiving Facility Inspection							
Name of the Facility:	TAP Representative(s):						
Name of the Operator:	Contractor Representative(s):						
Date of Inspection:	Date of previous TAP inspection (if any) and report number:						
Date of Report:							
General Facility Information							
Names and positions of contact/interviewed personnel:							
Geographical location:							
Number of years in operation:							
TAP waste streams received. For each waste stream please indicate: 1) any treatment / recycling / recovery / reuse applied 2) whether the waste stream is taken further elsewhere for disposal 3) whether waste stream is stored 4) whether waste steam is landfilled							
Site description and proximity to residential and social receptors and environmental receptors eg rivers, natural habitat							
Has the facility been audited/inspected by the regulatory authorities in the past (please indicate date of the last audit/inspection and authority)							
Is contract in place for engagement of the services of the facility to remove and handle TAP waste.							
Does the facility operator also transports waste from TAP sites?							
Area of Inspection	Applies?		Assessment				Observation Notes
	Applicable	Not applicable	Non-Compliant	50% Compliant	75% Compliant	100% Compliant	
Compliance Monitoring and Reporting							
Facility holds a valid licence for disposal of all waste streams received from TAP sites covered by the licence (please indicate licence number, scope, expiry date and issuing authority).							
Facility holds a valid licence for treatment/recycle/recovery of all waste streams received from TAP sites covered by the licence (please indicate licence number, scope, expiry date and issuing authority).							
Non-compliances identified during regulatory audit/inspection have been closed out.							
Facility undertakes regular reporting to relevant authorities (please indicate the format of reporting and frequency)							
Onsite temporary storage of waste pending collection meets applicable national regulatory requirements pertaining to maximum storage periods, maximum volumes and packaging needs.							
Where facility has been previously assessed/inspected by TAP, have all corrective actions and recommendations been implemented.							
Is contract in place for engagement of the services of the facility to remove and handle TAP waste.							
Subtotal for Compliance Monitoring and Reporting	0	0	0	0	0	0	#DIV/0!
Facility Design and Site Practices							
Site is secure preventing unauthorised entry by public and stray animals.							
Adequate vehicular access is available for receiving wastes and within the facility itself.							
Incompatible wastes are stored separately to prevent creation of health and environmental hazards.							
Emergency equipment available and is suitable for response to emergency that may arise from the quantities and types of waste present within the facility.							
Waste contains, tanks, areas, drums etc are labelled in languages appropriate for the site personnel and indicate the hazard associated with the stored waste.							
MSDS had been made available in host country language(s) at the hazardous waste storage areas and to the waste transporter and waste receiver.							
TAP waste is accompanied by waste manifests, disposal (or recover, reuse) certificates are available and submitted to TAP.							
Waste inventory maintained by the facility operator identifying volumes and quantities of wastes on site.							
Site personnel has appropriate training in handling hazardous wastes and is issued with PPE.							
Subtotal for Facility Design and Site Practices	0	0	0	0	0	0	#DIV/0!
Pollution and Nuisance Control							

 Waste Transporting and Receiving Facility Inspection										
Name of the Facility:					TAP Representative(s):					
Name of the Operator:					Contractor Representative(s):					
Date of Inspection:					Date of previous TAP inspection (if any) and report number:					
Date of Report:										
Dust kept at a minimum (no speeding by vehicles) and dust suppressed when necessary										
Facility design prevents ground pollution and liquid waste stored on impermeable surface with bunding available.										
Leachate control (lined cells) for landfill sites.										
Leachate treatment or containment and offsite treatment										
Process waste water discharges and site drainage treatment monitoring in line with permit requirements										
General housekeeping maintained throughout the site.										
Subtotal for Pollution and Nuisance Control	0	0	0	0	0	0	0		#DIV/0!	
Cultural Heritage, Social and Health and Safety										
Are there any Cultural Heritage concern or recommendations? (please specify)										
Are there any social concerns or recommendations? (please specify)										
Are there any health and safety concerns or recommendations? (please specify)										
Subtotal for CH, Social and H&S	0	0	0	0	0	0	0		#DIV/0!	
INSPECTION TOTAL:	0	0	0	0	0	0	0		#DIV/0!	
ID	Actions / Recommendations / Notes								Agreed Close Out Date	Actual Close out Date

		Waste Transporting and Receiving Facility Inspection	
Name of the Facility:		TAP Representative(s):	
Name of the Operator:		Contractor Representative(s):	
Date of Inspection:		Date of previous TAP inspection (if any) and report number:	
Date of Report:			
Photographs			
PHOTO 1:		PHOTO 2:	
PHOTO 3:		PHOTO 4:	

		Waste Management Inspection					
General Location:		Weather Conditions:					
Specific Sites Assessed:		Date of Inspection:					
TAP QHSE Officer:		Date of Report:					
Contractor Representative:							
Area of Inspection	Applies?		Assessment				Corrective Action
	Applicable	Not applicable	Non-Compliant	50% Compliant	75% Compliant	100% Compliant	
Resources							
Adequate resources are allocated to manage appropriate collection and segregation of waste and timely removal from site.		0	0	0	0	0	0
Sufficient number of personnel responsible for implementation of Waste Control procedure		0	0	0	0	0	0
Subtotal for Resources		0	0	0	0	0	0
Waste Contractors							
All waste streams are covered by third party agreements for removal, recycling/reuse or disposal (indicate if any waste is stored on site due to lack of third party arrangements).		0	0	0	0	0	0
All waste contractors (transporters, receiver, brokers etc.) been approved by Company?		0	0	0	0	0	0
Are waste contractors made aware of any safety or environmental procedures or requirements relevant to Company worksite?		0	0	0	0	0	0
Do waste transportation vehicles meet Company requirements (e.g. covered, spill kits available, etc.)		0	0	0	0	0	0
Subtotal for Waste Contractors		0	0	0	0	0	0
Waste Minimisation and Segregation							
Any waste recycling / minimisation initiatives implemented on site (e.g. such as maceration, de-watering, crushing, composting).		0	0	0	0	0	0
Adequate number of waste storage containers to enable correct segregation		0	0	0	0	0	0
Wastes not discarded to skips or containers are suitably packaged to facilitate loading and safe onward handling		0	0	0	0	0	0
Secondary containment with a capacity of 110% of the largest container in storage for all liquid waste provided.		0	0	0	0	0	0
Correct labelling of waste containers in English and host country language with indication of the contents and known hazards and colour coding where applicable		0	0	0	0	0	0
Evidence of correct waste segregation on site		0	0	0	0	0	0
Personnel aware of steps to take and where to seek guidance if unable to classify a waste stream.		0	0	0	0	0	0
Subtotal for Waste Minimisation and Segregation		0	0	0	0	0	0
Temporary onsite waste storage							
No waste is stored in other than approved temporary site storage/waste collection.		0	0	0	0	0	0
The temporary site waste collection/storage facilities designed to meet the TAP standards and specifications and had been approved by Company.		0	0	0	0	0	0
Locations of temporary waste facilities minimise exposure of workers to waste, and eliminate potential health and environmental hazards associated with storage and handling of mixed incompatible wastes		0	0	0	0	0	0
Design meets Company specifications for prevention of ground pollution, vehicular access, secondary containment and weather protection.		0	0	0	0	0	0

		<h2 style="text-align: center;">Waste Management Inspection</h2>					
General Location:		Weather Conditions:					
Specific Sites Assessed:		Date of Inspection:					
TAP QHSE Officer:		Date of Report:					
Contractor Representative:							
Provision of appropriate training and PPE to personnel assigned duties within collection areas							
Emergency response equipment is available.							
Waste removed from site by waste contractors in a timely manner and at adequate frequencies.							
Onsite temporary storage of waste pending collection by contractors meets applicable national regulatory requirements pertaining to maximum storage periods, maximum volumes and packaging needs.							
Storage of wastes onboard vessels: managed in accordance with Company Operations Environmental Standards and as outlined in Contractor Vessel Garbage Management Plan.							
Subtotal for Temporary Onsite Waste Storage	0	0	0	0	0	0	#DIV/0!
Management of Specific Wastes							
Contaminated soil arising from hydrocarbon spills: collected, packaged and removed by a licensed Contractor.							
For onsite treatment of contaminated soils (if applicable): the treatment methodology has been approved by Company and regulatory license is held by Contractor.							
Specific hazardous wastes (radioactive, asbestos, explosive, etc.) are handled and disposed of in line with national legislation of the host country and Company ESCH standards and specifications, whichever is more stringent, with engagement of a specialist waste contractor and Company approval for disposal methodology							
Medical waste is handled by trained personnel and licenced facility.							
Hazardous liquid waste: collected on site in line with Company Operations Environmental standards and transported, treated and disposed of by a licenced waste facility.							
For onsite treatment of hazardous liquid wastes (if applicable): the results of treated liquid wastes are monitored and verified for compliance to Company Operations Environmental Standards and are reported to Company							
Drainage water and bilge water onboard vessels: collected, treated to and discharged in line with provisions of Company Operations Environmental Standards and MARPOL 73/78 Annex I.							
Sewage and grey water is either (specify which): a) collected in tanks and disposed of by a licenced waste contractor b) direct connection to or transfer via tankers to existing municipal sewage network c) treated onsite and discharged into environment under a permit							
For onsite treatment of sewage (if applicable): treatment plant designs has been approved by Company, the results of treated sewage are monitored and results are verified for compliance to Company Operations Environmental Standards and are reported to Company.							
For onsite treatment of sewage (if applicable): sewage sludge is collected and transported by vacuum tanker for disposal at a licensed facility.							
For vessels where collection and storage of untreated sewage and grey water onboard is not feasible, the discharge is undertaken in line with provisions of Company Operations Environmental Standards and requirements of Annex IV and V of MARPOL 73/78							
Waste incinerator (if applicable) design approved by Company and covered by a permit under national legislation. Monitoring programme and disposal of ash in line with requirements of the Company Operations Environmental Standards.							




Waste Management Inspection

General Location:				Weather Conditions:					
Specific Sites Assessed:				Date of Inspection:					
TAP QHSE Officer:				Date of Report:					
Contractor Representative:									
Ballast water discharged (at least 200 nm from the nearest land and in water at least 200 metres in depth) or if unable as meet above then in all cases at least 50 nm from the nearest land and in water at least 200 metres in depth. Discharge of any water collected from outside of the Mediterranean Sea avoided.				0	0	0	0	0	0
Subtotal for Management of Specific Waste				0	0	0	0	0	#DIV/0!
Waste Tracking and Monitoring									
Waste tracking documentation is filled in correctly and accompanies every waste shipment from site along with any other documentation required under local legislation.				0	0	0	0	0	0
Is the following waste documentation available: • electronic Waste Tracking Register containing information from WTNs • electronic Waste Inventory for each onsite temporary waste storage facility detailing quantities of each waste type, which is updated on daily basis.				0	0	0	0	0	0
Within waste documentation the wastes are classified with the waste codes as outlined in the European Waste Catalogue (EWC)				0	0	0	0	0	0
MSDS had been made available in English and host country language(s) at the hazardous waste storage areas and to the waste transporter and waste receiver.				0	0	0	0	0	0
Where no liquid hazardous wastewater treatment facilities are available in the host country, waste is held at a licensed holding facility for further transportation in line with the requirements of the Basel Convention.				0	0	0	0	0	0
All Contractors construction vessels maintain the following required under MARPOL: • Garbage Management Plan and Garbage Record Book • International Sewage Pollution Prevention Certificate and detailed logs of overboard discharges - all vessels with marine sanitation device.				0	0	0	0	0	0
All Contractor construction vessels of 400 gross tonnage and above carry: • International Anti-fouling System Certificate and Anti-fouling Declaration • Ballast Water and Sediment Management Plan, Ballast Water Record Book and an International Ballast Water Management Certificate and detailed logs of associated overboard discharges.				0	0	0	0	0	0
Subtotal for Waste Tracking and Monitoring				0	0	0	0	0	#DIV/0!
INSPECTION TOTAL:				0	0	0	0	0	#DIV/0!
Action Items / Notes								Agreed Close Out Date	Actual Close out Date
ID	Action Items (from this inspection)								
ID	Overdue Actions from previous inspection (agreed close out dates not met)								
ID	Completed Actions (record only once)								



Waste Management Inspection

General Location:	Weather Conditions:
Specific Sites Assessed:	Date of Inspection:
TAP QHSE Officer:	Date of Report:
Contractor Representative:	
Photographs	
PHOTO 1:	PHOTO 2:
PHOTO 3:	PHOTO 4:

 <div style="text-align: center;">WASTE TRANSFER NOTE</div>					
Registration No: _____					
Source Site/Location:			Date:		
EWC Code	Waste Stream	Quantity	Units (kg, L, m ³)	Containment / Packaging (Containers / Skips / Drums)	Classification (haz. / non-haz.)
Additional information (handling, transport, precaution, condition of container, requirements to return empty container)					
Waste shall be sent to: TAP Facility <input type="checkbox"/> Third Party Facility <input type="checkbox"/>					
Part A to be Completed by Producer					
Receiver					
Facility Owner					
Facility Address					
Certification			I declare that information I provided in Part A are accurate, that the consignment is accurately described and is in appropriate condition for transportation		
Name		Signature / Date			
Part B to be completed by Transporter					
Transporter name		Company			
Driver License Number		Vehicle Number			
Contact		Address			
Certification		I declare that information provided by Generator in Part A and by me, the Transporter in Part B accurate.			
Name		Signature / Date			
Part C to be completed by Receiver					
Date and time received		Receiver is same as indicated in Part A		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Receiver observations on containment (good/poor conditions, appropriate consignment number and content received)					
Receiving location coordinates / address		Facility Name			
Certification		I declare that I received the wastes as described in Part A of this manifest, with the discrepancies, irregularities listed above. I also declare that the information in Part C is correct and complete.			
Name		Signature / Date			
Part D to be completed by Producer					
<input type="checkbox"/> Landfill		<input type="checkbox"/> Incineration		<input type="checkbox"/> Reuse / Recycle through Company (Name and Address)	
Certification		I declare that the information in Part D is correct			
Name		Signature / Date			

Where national legislation provides for the format of the waste chain of custody documentation, the form required by the national legislation shall be used. Where no such format is provided by national legislation this template shall be implemented.

