

ENVIRONMENTAL MANAGEMENT PLAN

Environmental Management System
NP EN ISO 14001

APA - ADMINISTRAÇÃO DO PORTO DE AVEIRO, S.A.

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1. ENVIRONMENTAL POLICY

APA - Administração do Porto de Aveiro, S.A. (Aveiro Port Management), a joint-stock company with exclusively public capital with the objective of the economic operation, conservation and development of Aveiro port. This will in the short term be one of the most dynamic and competitive ports on the Atlantic coastline of the Iberian Peninsula as regards short sea shipping and will be backed up by a large logistical and industrial development.

At the same time as being determined to play a leading role in the progress of the region and the vast community it serves, APA also endeavours to implement practices that respect the principle of sustainable development and preservation of the environment.

Therefore, Aveiro Port Management reiterates its environmental responsibilities and renews its commitment towards ongoing improvement, based on the following principles:

- ✓ Encourage rational and efficient management of resources, namely water and energy, especially focussing on the reduction of consumption and utilisation of renewable energies;
- ✓ Prevent pollution and minimise the significant environmental impacts linked to its activities;
- ✓ Comply with the legal requirements applicable to its activity and other regulations that APA subscribes to;
- ✓ Establish and review on a regular basis the aims and targets, taking into account the significant environmental aspects;
- ✓ Make sure that the supplies contracted and customers comply with the legal requirements and other internal regulations;
- ✓ Encourage the personal and professional development of the employees, guaranteeing that they pull together with the company management, a desire that extends to all the Port Community operators;
- ✓ Motivate the Port Community to strive for ongoing improvement in its environmental performance in all its activities, products and services;
- ✓ Cooperate with and encourage communication with external entities, such as government bodies and local authorities, in order to safeguard the environment and the general public;
- ✓ Disseminate the Environmental Policy adopted by all employees working for APA or in its name, keeping this policy permanently accessible to the public.

The Board of Directors will provide the facilities required to ensure full compliance with the obligations deriving from the implementation of the Environmental Management System of APA, in accordance with the NP EN ISO 14001 Standard.

The Board of Directors
December 2006

2. ABOUT THE ENVIRONMENTAL MANAGEMENT PLAN

2.1. PROMULGATION

APA continues to view environmental management as an important tool in the development and sustainable growth of Aveiro Port.

As such, the Environmental Management System shall remain in force, in accordance with the new NP EN ISO 14001:2004 standard, in order to guarantee suitable environmental performance, as well as encouraging the port community to adopt good practices that respect and preserve the environment.

Endeavouring to guarantee compliance with its environmental and social responsibilities, this Management acknowledges the importance of providing a management system in line with the ISO 14001 standard, which is used by a growing number of organisations, thus leading to national and international recognition of the management work carried out.

The Environmental Management Plan reflects the Environmental Policy of the company and establishes the basis of the Environmental Management System. Its content must be permanently respected and complied with by all employees of the company in its application.

The employee responsible for the Environmental Management System, the Environmental Officer, is in charge of making sure that all the requirements of this Manual are fully complied with.

APA Management makes a firm commitment towards preserving the environment, and as such promulgates this version of the Environmental Management Plan.

Forte da Barra, 12 September 2007

José Luís de Azevedo Cacho
(Chairman of the Board of Directors)

2.2. Aim

The Environmental Management Plan is the main operational document of APA's Environmental Management System (EMS). Moreover, it is a document that aims to divulge the EMS to any person or organisation interested or affected by the environmental performance of APA.

It contains the Environmental Policy of the organisation and describes the EMS established, and has the main functional aim of constituting a permanent reference point for the application and maintenance of the system.

The APA Environmental Management Plan reflects the requirements of the Portuguese Standard "NP EN ISO 14001:2004 - Environmental Management Systems - Requirements and guidelines for its use", including the Correction 1:2006 and has the following goals:

- Divulging APA's Environmental Policy to all employees of the organisation;
- Describing the Environmental Management System
- Describing the essential details of the EMS and its interactions;
- Providing guidelines about related documentation;
- Providing a document basis for the undertaking of EMS audits;
- Presenting APA's EMS to Clients or other interested parties to show compliance with the requirements of the reference standard.

3. PRESENTATION OF APA

3.1. AVEIRO PORT MANAGEMENT

3.1.1. Background

APA – Administração do Porto de Aveiro, S.A. (Aveiro Port Management), is a joint-stock company with exclusively public capital, aimed at the economic operation, conservation and development of Aveiro port.

3.1.2. Area of Jurisdiction

The area of jurisdiction of APA, covering the councils of Aveiro and Ílhavo, includes:

The coastal strip within the limit of the maximum legal width of the maritime public domain, between the parallel + 108 000 (approximately 80 metres south of the South Wharf) and 50 metres north of the North Wharf;

The flattened land used for the operation and expansion of Aveiro port, which includes the South Terminal, the North Terminal, the Solid Bulk Terminal, the Liquid Bulk Terminal, the Roll-On/Roll-Off and Container Terminal, the Coastal Fishing Port and the High-sea Fishing Port;

The navigation channels adjacent to the flattened expansion land and respective banks, inside the Maritime Public Domain:

- In the Mira channel - located north of the Harbour bridge;
- In the São Jacinto channel - located south of the Pedra quay;
- In the Ílhavo channel - located north of the EN 109-7 bridge;
- In the main navigation channel in the council of Aveiro - west of the east vertex of Moleira marina;
- In the Espinheiro canal - located south of a line that unites the south vertex of Garras marina and the north vertex of Cancela do Mar marina or Cancela do Sudoeste.

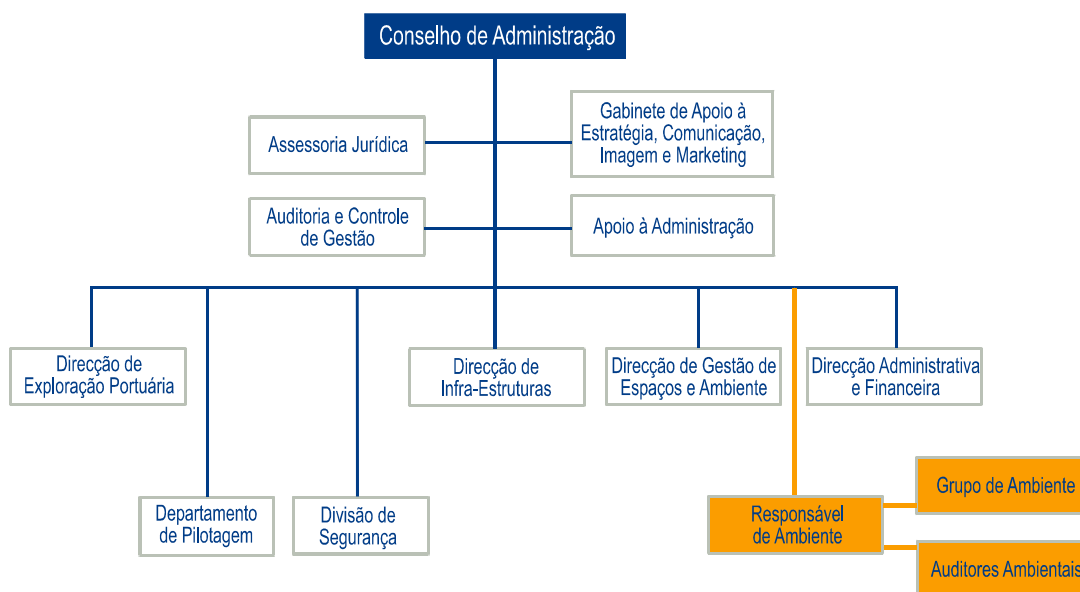
3.1.3. Administrative Organisation and Human Resources

Organisation

APA, as a joint-stock company, is managed by a Board of Directors, made up of a Chairman and two Board Members. It also has a General Assembly and the Statutory Auditor, whose powers are detailed in the statutes published in Decree-Law no. 339/98, of 3 November.

The APA hierarchy is split into 6 large functional areas shown in the organisational chart below and which combine a set of services destined to fully comply with the functions of each area of activity. The Management also includes 4 assistance and management support bodies.

It is pointed out that following the implementation of the EMS, the position of Environmental Officer was created, who is nominated by the Board of Directors, as well as an Environmental Group and a Group of Environmental Auditors.



Human Resources

As regards Human Resources, as of 1 September 2007 APA had a workforce of 121 employees. As part of its maritime port policy, this Board of Directors has been changing its method of functioning and organisation, overseeing essentially coordination, administrative and inspection functions and carrying out its role of protecting the public interest. It therefore undertakes to furnish indispensable training to each employee in order not only to build on their current skills, but also to solidify bases for the expansion of knowledge, enhancing professional and personal fulfilment.

3.2. THE PORT COMMUNITY

A host of agencies operate at Aveiro Port, making up the Port Community, which can be divided into several groups. Of importance for the EMS are the inspection entities and/or inspectors; the navigation agents and their respective association; the stowage companies and Port Employment Association of Aveiro, and finally, the importers/exporters of commodities and transporters.

Most of these entities are interconnected to the Port Management System (Ship Dispatch Centre), which makes it an increasingly powerful communication tool, allowing the debureaucratisation and simplification of the procedures linked to port operations.

The port zone accommodates several private premises which are occupied with the permission of the Port Management, and are subject to concession or leasing contracts. Notwithstanding other licences that must be obtained, these entities are subject to the recommendations and standards imposed by APA, which must be fully complied with.

It is important to point out that the South Terminal is yielded to the company Socarpor - Sociedade de Cargas Portuárias (Aveiro), SA, the Fish Stalls and the Ice Factory of the Coastal Fishing Port to Docapesca - Portos e Lotas, SA and the tugboat activity to the company Tinita, Transportes e Reboques Marítimos, SA, and it is likely that the number of concessions to public service shall be widened in the coming years.

3.3. PORT INSTALLATIONS

The head office building of Aveiro Port is located in Barra Fortress, in an administrative zone that includes a set of other buildings occupied by entities and companies that work directly with Aveiro port. In addition to these administrative areas, APA also owns backup premises, such as workshops, garages and the warehouse.

In order to transport the different kinds of goods, Aveiro Port contains separate terminals geared towards general cargo, solid bulk, liquid bulk, roll-on/roll-off cargo, containers and fish. Around these terminals there are also complementary areas such as the Aveiro Logistical and Industrial Activities Zone (ZALI area), which will cover 130 hectares and possess 1 080 metres of mooring quay,

with depths of -12.00 m (Z.H.); the deposit and sale of inerts zone; the areas occupied by the shipyards. Road access to the facilities will soon be complemented by rail access.

North Terminal - Has a 1150-metre long mooring quay, depths up to -12.00 m (Z.H.) and 360 000 m² of flattened land.

The covered warehousing area is made up of eight warehouses, two of which are set aside for the reception and storage of cement in bulk, as well as a sacking unit.

This terminal is geared towards the transport of general cargo, with the following goods profile: Cement, cereals, paper paste, metal sections, wood agglomerates and clays.

Ro-Ro and Container Terminal - This terminal has a 450-metre long quay, depths up to -12.00 m (Z.H.), 138 000 m² of flattened land duly equipped with infrastructures for added value services.

South Terminal - the commercial operation at this terminal is yielded to a public service concessionaire Socarpor - Sociedade de Cargas Portuárias (Aveiro), SA. It is the port facility closest to the city of Aveiro. It has a mooring quay 400 metres long, depths up to -7.00 m (Z.H.) and approximately 47 000 m² of flattened land.

The covered warehousing area is made up of a roofed shelter and three warehouses, two of which are for reception and warehousing of cement in bulk.

The throughput at this terminal is chiefly metal products, cement, paper paste and food products.

Liquid Bulk Terminal - Specialised terminal, devoted exclusively to the transport of liquid bulk. It has 6 mooring posts: 3 posts at a depth of -12.00 m (Z.H.) and another 3 at a depth of -7.00 m (Z.H.). The facilities are run by different private companies who are specialised in the transport of chemical products (vinyl chloride, anilines, MDI, methanol, etc), winemaking products, petrol products and biodiesel.

Solid Bulk Terminal - this terminal has a 750-metre long quay, with depths of -12.00 m (Z.H.), with 450 metres dedicated to different bulk products and 300 metres geared towards the food segment. This terminal has 151 000 m² of flattened land duly equipped with infrastructures for added value services.

High-sea Fishing Port - This terminal runs along a 1950 m bank, to which 18 quay bridges are connected with depths up to - 7.00 m (Z.H.).

This sector serves essentially high-sea fishing and fish catch processing industries.

Specialised Fish Discharge Terminal - This specialised terminal is part of the High-Sea Fishing Port. It is 160 metres long and has a platform containing a building and other infrastructures needed for the functioning of a facility of this nature.

Coastal Fishing Port - This sector is equipped with a set of land and maritime infrastructures that allow the unloading of the fish catch carried out by small boats providing daily services, as well as the storage and selling of the fish.

The fish stalls and the ice factory are yielded to the company Docapesca, Portos e Lotas, SA.

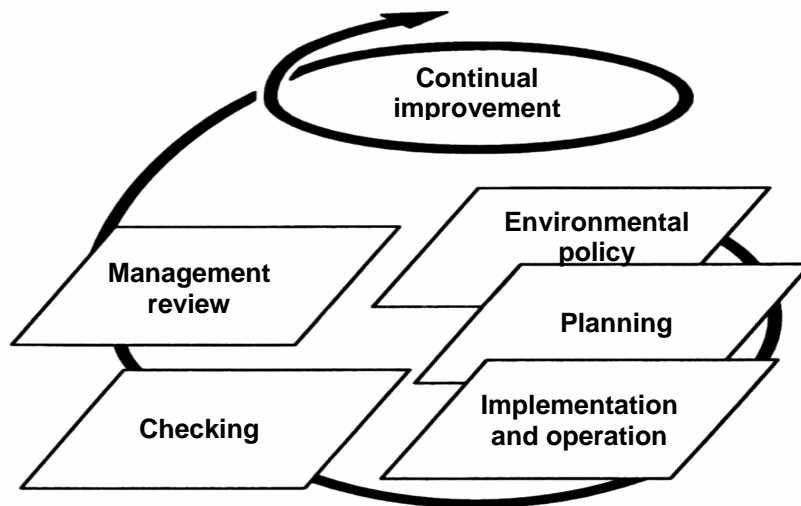
Shelter Port for Small Fishing Boats - Located next to the Coastal Fishing port is a surrounding bank protection, to which two floating gangways are connected, with capacity for 136 boats.

The land infrastructures include 1 support building and 72 preparation warehouses.

4. DESCRIPTION OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

4.1. GENERAL REQUIREMENTS AND SCOPE OF EMS

The APA EMS was initially implemented in accordance with the requirements of the Portuguese standard, NP EN ISO 14001:1999. Subsequently, with the publication of the new version of this Standard, this system transited to *NP EN ISO 14001:2004 + Correction 1:2006*, henceforth named NP EN ISO 14001, based on a model translated in accordance with following figure:



In the initial phase, in defining the scope of the EMS, it was considered that no benefit would be gleaned from excluding areas under the port's jurisdiction. Therefore, the EMS was drawn up to cover the whole activity of APA within its area of jurisdiction, as defined in 3.1.2.

Therefore, the scope of the EMS implemented is the "Economic operation, conservation and development of Aveiro Port, including its entire area of jurisdiction".

4.2. ENVIRONMENTAL POLICY

APA revised this document, drawing up and approving the new Environmental Policy on 13 December 2006. This is presented in Chapter 1 - Page 3, of this Manual and expresses the position of the Board of Directors with regard to the company's relation with the Environment.

The Environmental Policy may be reviewed and changed if the APA Board of Directors deems it appropriate to do so.

Considering the importance of the EMS for the organisation and for the different interested parties, the Environmental Policy is always available in writing to the public and actively communicated to all staff and the general public.

4.3. PLANNING

4.3.1. Environmental aspects

The identification and assessment of APA's Environmental Impacts constitutes the first step in the EMS planning phase. This process is undertaken in accordance with a written procedure (P01 - Environmental Aspects) and results from the permanent and updated data concerning the Main Environmental Aspects of the activities, products and services that APA can control and influence. The positive and negative environmental aspects are classified in accordance with their characteristics and may be:

- the result of the normal functioning of APA,
- induced by emergency situations,
- associated to future projects or activities,
- environmental liabilities resulting from past activities,
- indirectly generated by activities that APA cannot control but can influence.

Their significance is defined according to a strict methodology, based on objective criteria such as how to control the impact and the effect on the environment.

Finally, of particular importance is the fact that any APA employee or other interested party may contribute to the identification of new environmental aspects to be dealt with as part of the EMS.

4.3.2. Legal and Other Requirements

The importance APA attaches to keeping up to date and complying with all legal and other requirements that the organisation is signed up to justifies the existence of a documented procedure (P02 - Legal and other Requirements) that allows these requirements to be known and complied with in a systematic form.

The legal requirements are grouped into environmental indicators, so that they can be easily linked/applied to the environmental aspects.

The execution of this procedure involves the perusal of information sources such as the *Diário da República*, 1st and 2nd Series, as well as the Official Journal of the European Community and implies close collaboration between the Administrative and Financial Department and the Environmental Officer of APA.

4.3.3. Aims, Targets and Programme(s)

APA's Environmental Aims and Targets are defined by a group of employees from different functional areas of the company, integrated into the Environmental Group. The different Aims and Targets are defined taking into account the Environmental Policy, including the commitments made in relation to prevention of pollution, compliance with legal requirements and other regulations applicable to APA, so as to bring about ongoing improvement. It also takes into account the significant environmental aspects, as well as the applicable legal requirements and other regulations the company subscribes to. Also considered are the statements from interested parties, and the financial, operational and business requirements.

The prosecution of the approved Aims and Targets constitutes an essential planning tool for continuous improvement and prevention of pollution. Given the importance of the Aims and Targets for APA's EMS, they are defined for the pertinent functions and levels and are documented in the Environmental Management Programme, after being approved by the Management.

The Environmental Group also outlines in the Environmental Management Programme the different actions to be carried out by the company to achieve its Aims and Targets. The programme defines

deadlines, responsibilities, the human, material, technological and financial resources and any statements issued by interested parties.

The Environmental Management Programme is approved by the Management and may be reviewed at any time by the Environmental Group upon the appearance of any significant change in the circumstances that are at the basis of its preparation and justify its revision.

Although some Aims may have periods of more than a year for compliance, the Environmental Management Programme is reviewed and updated on an annual basis.

The APA Environmental Officer monitors the execution of the programme, and should communicate any non-compliance to the Management, as well as triggering corrective or preventive actions in accordance with procedure P11 - Non-conformity, Corrective and Preventive Actions.

4.4. IMPLEMENTATION AND OPERATION

4.4.1. Resources, Attributes, Responsibilities and Authority

APA has established a written procedure P03 - Structure and Responsibility, in order to define, document and communicate the functions, responsibilities and authority of the employees involved in the EMS in order to make it effective.

The Administrative and Financial Department of APA is in charge of drawing up a Manual of Responsibilities which clearly outlines the functions/duties, responsibilities and authority of its entire staff, in particular in relation to the EMS.

This document is approved by the Management and kept up to date by the APA Administrative and Financial Department which is also responsible for its dissemination to the company staff.

The functional and organic structure of APA can be seen and clearly understood in the Organisational Chart that is also written in the company's Manual of Responsibilities.

The recruitment of a new employee is also of particular importance for the EMS. Any new employee must be integrated into the functioning management system.

With regard specifically to the Environmental function, the existence of an implemented and working EMS necessarily involves the whole workforce in a continuous effort without which the whole system does not make sense. However, some of the functions are of particular importance and should be highlighted, namely:

- A board member, from the Board of Directors, directly charged with and responsible for monitoring the entire EMS.
- An environmental area, dependent on the Port Zones and Environment Management Board, which is responsible for:
 - Guaranteeing the improved quality of the environment in the port area;
 - Ensuring compliance with the applicable legal standards;
 - Monitoring and promoting APA studies, projects and works at the environmental level;
 - Monitoring and promoting the port activities at the environmental level;
 - Producing and divulging the information required for compliance with the applicable environmental standards and ensuring knowledge of the state of the environment in its area of jurisdiction, etc.
- The Management has nominated an Environmental Officer as the Management's specific representative for the EMS. This officer, regardless of other responsibilities, has functions, responsibilities and authority defined for:
 - Ensuring the EMS is established, implemented and maintained, in compliance with the NP EN ISO 14001 standard;
 - Reporting to the Management on the performance of the Environmental Management System for review or as a basis for improving it.
- Finally, a consultancy body has been set up, the Environmental Group, which is made up of staff of acknowledged competence and experience in their areas of activity at APA, contributing towards the drawing up, discussion and analysis of various environmental matters.

4.4.2. Skills, Training and Awareness

APA uses a written procedure, P04 - Training, Awareness and Skills to ensure that the training needs are periodically identified and that all the staff whose work may have a significant environmental impact have appropriate training and skills.

This procedure allows the periodic identification of the training needs of all the APA staff, based on which the annual training plan shall be drawn up, approved by the Management.

All internal or external training shall be registered in its own right. Whenever applicable, the efficacy of the training actions attended by the APA staff shall be assessed.

The company's Manual of Responsibilities also contains minimum requirements for the performance of given functions, especially with regard to environmental issues.

The investment made in training the APA staff is in line with the normal development of the organisation and its environmental performance.

4.4.3. Communication

APA has developed and maintains a documented procedure, P05 - Communication, that aims to ensure the internal communication of the EMS, as well as external communication to interested parties when relevant.

This procedure defines all the internal means of communication at APA that are used as part of its EMS and outlines the process of receiving external requests for information from an interested party, the respective internal forwarding and response, when the request is considered relevant.

As well as all the relevant information, APA has defined simple mechanisms to provide information to any interested party in relation to the significant environmental aspects of the organisation and the company's Environmental Policy.

Communication with the media deserves special attention, and should be undertaken by the Chairman of the Board of Directors or a person designated by him for the purpose.

This policy of communication is proof of the importance it constitutes for the company, both at internal level and at external level, as an indispensable mechanism for the efficacy and visibility of APA's environmental management.

4.4.4. Documentation

This Environmental Management Plan describes the essential details of the EMS implemented at APA and its interactions, also providing guidelines about related documentation. The intention is to have an updated EMS always available in the organisation.

The Environmental Officer is responsible for drawing up, reviewing and distributing this manual, which the Management shall subsequently approve.

4.4.5. Control of Documents

The documents establish, as part of the EMS, reference situations for the organisation or the way to carry out an activity.

In order to control all the EMS documentation, APA maintains a documented procedure: P07 - Control of Documents. This procedure is aimed at ensuring that all documents related to the EMS can be located, are periodically analysed and reviewed, and are issued, distributed and stored in a controlled manner.

The controlled internal documentation includes the environmental policy, this environmental management plan and other manuals, procedures, plans, work instructions and forms. Some external documentation produced outside APA is also subject to control owing to its importance.

These documents are managed using codes to help in their referencing. APA maintains controlled documentation both for hard copies and for documentation existing only in digital form.

4.4.6. Operational Control

Through the procedure P08 – Operational Control, it is possible to identify and plan the activities associated with the main environmental aspects of APA, including their maintenance, so that they are fully controlled.

For all the operations and activities associated with the environmental aspects classified as significant, including maintenance operations, the organisation defines a specific operational control procedure.

Whenever the lack of documented procedures may lead to failure to comply with APA's environmental policy, aims and targets, an Operational Control Work Instruction is used for the respective operation or activity. If this specific procedure is not documented, then the implementation of practices is monitored to make sure that these operations or activities are undertaken in a controlled manner.

These Operational Control Work Instructions must contain, whenever applicable:

- Operational criteria so that any discrepancies from the reference situation are clear to see;
- Figures, drawings, flowcharts and other graphical details to facilitate understanding and execution.

4.4.7. Emergency Preparedness and Response

The formal safety management structure is extremely extensive and documented, in accordance with the particularities and responsibilities of an entity such as APA. The organisation has a Safety Division which acts in the areas of safety of the premises and emergency response, and a Piloting Department that is responsible for prevention in the field of navigation safety.

In order that the prevention and emergency response set-up can guarantee the prevention and reduction of the environmental impacts of its operation, APA has developed and maintains a

documented procedure - P09 - Prevention and Emergency Response, with an the interface between safety and the environment.

This interface with the Safety Division and Piloting Department is particularly important with regard to:

- Identification of environmental impacts arising from potential accidents or emergency situations;
- Collaboration in the prevention procedures and in the response to these situations so as to prevent and reduce the environmental impacts inherent to the accident or emergency;
- Support in the review and updating of documentation;
- Registration of emergency or accident situations;
- Support in planning simulation actions.

4.5. CHECKING

4.5.1. MONITORING AND MEASUREMENT

In accordance with documented procedure P10 - Monitoring and Measurement, APA maintains specific and documented processes for periodic monitoring and measurement of the characteristics of its operations and activities with a significant environmental impact.

An important distinction is made between the concept of monitoring, i.e. the use of instrumental techniques to obtain values relative to any environmental characteristic, such as noise or pollutants in waters, and the concept of measurement understood as the monitoring of any environmental characteristic using numerical, accounting, direct observation and registration methodologies, for instance.

Both for monitoring and measurement, environmental indicators are established that relate the characteristics of an environmental character with other APA management data, in order to track the evolution of the environmental performance of the organisation. These indicators are also used

to track the performance of the relevant operational controls and compliance with the environmental aims and targets of the organisation.

The environmental monitoring or measurement of relevant parameters for the EMS implies the use of equipment subject to calibration or maintenance, which is carried out both using outsourcers and internally. Hence, when using outsourcers, a guarantee of the operability of the equipment is requested from the providers of this kind of service and the respective registers are maintained in accordance with the APA procedure, already outlined in this document. When the calibration or maintenance is carried out internally, APA will keep the equipment operating in accordance with the rules of its EMS.

4.5.2. Assessment of Conformity

Compliance with the legal and other requirements applicable to APA, as well as being specifically controlled at the level of different monitoring and measurement procedures, is also systematically checked in an internal audit.

For this purpose a specific audit is included in the Annual Auditing Programme to assess the conformity of the legal requirements and other applicable regulations.

APA will carry out the joint assessment of conformity of the legal requirements and other regulations, using a checklist, a copy of the “Legal Requirements and Other Regulations - Assessment of Conformity” file, which includes all the requirements applicable to APA.

4.5.3. Nonconformance, Corrective and Preventive Action

Non-conformity describes situations that deviate from defined reference procedures or regulations, such as those outlined in the APA Environmental Policy, the EMS documentation, the applicable legislation or the NP EN ISO 14001 standard.

To systematise responsibilities and authority to investigate and deal with non-conformity, take measures to minimise the impacts caused, begin and complete corrective or preventive actions, a documented procedure is established, P11 - Nonconformance, Corrective and Preventive Action.

This procedure distinguishes between real and potential non-conformity, as well as detailing the different forms of dealing with it through corrective and preventive action.

An essential factor in dealing with non-conformity involves identifying and acting on the cause of the occurrence and checking on the efficacy of the measures triggered to solve it. As such this methodology intends to avoid repetition of the same non-conformity.

It should be added that any employee can trigger the non-conformity procedures by identifying the case, and likewise any employee can be involved in the actions leading to its rectification.

Finally, it is pointed out that this tool of the EMS also allows the identification and possible undertaking of improvement opportunities, even if not related to situations of real or potential non-conformity, which are registered as observations.

4.5.4. Records

The records of an EMS constitute a useful objective tool for carrying out any activity or dealing with any situation.

APA has defined and maintains a procedure, P12 - Control of Records, in order to ensure that all the EMS records are identified, compiled, organised and able to be located. Archives shall also be established and maintained, and eliminated when no longer relevant.

4.5.5. Internal Audit

Internal environmental audit constitute the most important method of keeping control over the functioning of the EMS and are vital for producing continuous improvement.

The procedure P13 - Internal Audits allow the planning and undertaking of internal audits at defined intervals, to check the conformity of the EMS with the requirements of the NP EN ISO 14001 standard and its efficacy.

The demands and complexity of undertaking internal audits calls for the need for clear criteria regarding the qualification of staff or people outside APA as members of the Auditing Team. The team shall use its own auditing methods and shall always strive to be objective and impartial.

The undertaking of an internal EMS audit is always a carefully planned process that may involve any area or employee of the organisation. Non-conformities are observed and an audit report is drawn up with shall be divulged internally.

The success of internal audits and the benefit of this activity is directly proportional, on the one hand, to good planning, and on the other hand to the collaboration of all parties involved, whether auditors or staff being audited.

4.6. MANAGEMENT REVIEW

The review of APA's EMS is the last stage of the set of phases outlined in point 4.1 of this Environmental Management Plan (Planning, Implementation and Operation, Checking, Management Review) and simultaneously translates into the closing of a cycle and the start of a new one. It is therefore an essential step in the commitment towards continuous improvement.

The EMS review is a documented process, undertaken by the top-level Management at least once a year. Its goal is to allow the Management to carry out a critical analysis of the functioning of the EMS, in order to ensure that it remains adequate, sufficient and effective.

This review process is based on information prepared by the Environmental Officer.

This information must necessarily include: details that allow assessment of the level of execution of the different Programmes and Plans approved by the Management, status of the corrective and preventive actions, as well as communications from external interested parties; the results of the audit processes; the follow-up actions of the previous revision and information processes in relation to alteration of circumstances which influence the environmental performance of APA or the functioning of the EMS. It may also include other details that the Environmental Officer or the Environmental Group considers relevant for this process.

The Management shall, as part of the review, produce a set of guidelines, grounded whenever possible, which enable the guiding principles to be established for a new functional cycle of the EMS implemented.

5. COLLABORATION WITH OTHER ENTITIES

The functioning of an Environmental Management System, in accordance with the Portuguese standard NP EN ISO 14001, involves the endeavour in the first instance of APA, in collaboration with different entities.

As a management system developed and maintained focussing on a value as all-encompassing as the Environment, which does not depend solely on APA's activity and which goes beyond the physical limits of its area of jurisdiction, there are several situations that necessitate the intervention and collaboration of other entities, which should be highlighted:

The **Portuguese Environmental Agency** oversees, at nationwide level, the management of the environment, namely in the areas of air quality, environmental impact, waste, prevention of serious risks, integrated control of pollution and environmental education.

Health Authority - responsible for determining precautionary measures to minimise the effects of water consumption when this involves risks to human health.

Municipal Councils (Aveiro and Ílhavo) - responsible for the planning and ordering of the territory, including the port area. The councils issue statements on projects/works undertaken by third parties in the area under the jurisdiction of APA, inside the respective councils, and on port infrastructure projects. They also license the exercising of some activities.

Aveiro Port Captaincy - local maritime authority involved in the Clean Sea Plan in the event of pollution of sea waters, ports and estuaries with hydrocarbons and other dangerous substances. It collaborates in emergency situations, upon request from APA and in line with its powers. It also regulates the Maritime Public Domain.

Aveiro District Centre of Emergency Operations and Civil Protection - regional coordinating entity in the event of an emergency at Aveiro Port, whenever the consequences of a possible accident go beyond the area of jurisdiction of APA.

Coordinating Committee and Regional Development of the Centre (CCDR-C) - responsible for the management of water in the port jurisdiction area, licensing of water catchments and wastewater rejection, and for coordination of some Environmental Impact Assessment processes. It also issues

statements with regard to wide-ranging environmental issues under its scope, with special emphasis on the National Ecological Reserve and noise pollution.

Port Community - made up of a vast group of entities, associations and companies that intervene in the port activity, jointly responsible for the environmental impact resulting from the normal operation of Aveiro port and which are influenced by the EMS. This community includes, among others, inspection and/or licensing entities, Navigation Agents and respective Association, Stowage Companies and the Port Employment Association, importers and exporters of commodities, transporters, companies that have their private or yielded premises in Aveiro Port and the public service concessionaires.

Voluntary Fire Brigade - Ílhavo and Aveiro fire brigade corporations (Old and New) are responsible for intervention in the event of an accident (emergency response), through a protocol established between these entities and APA.

Suppliers - organisations duly licensed for activities involved in the implementation of the EMS, namely waste management companies, noise assessment entities, water analysis laboratories, among others.

Nature Conservation Institute (ICN) - issues binding statement on all the projects that are located in the Special Protection Zone of *Ria de Aveiro*.

Port and Maritime Transport Institute (IPTM) - authorises and controls, at national level, dredging operations and the immersion of dredged materials as part of the Oslo Convention. Assesses and approves Waste Reception and Management Plans for ports for waste coming from ships or cargo operations. It also carries out inspections as part of the Port State Control.

Waters and Waste Regulating Institute (IRAR) - ensures, at national level, the quality of the water for human consumption.

Other interested parties - there are also a set of the other entities, such as Parishes, nautical clubs, environmental protection associations and opinion groups that are interested or involved in the environmental performance of APA, namely with regard to its interaction with the zone of high environmental value - *Ria de Aveiro* - and which can lend their voice to environmental issues.