



**PREVENTION AND REDUCTION PROGRAMME
REGARDING THE QUANTITIES OF WASTE GENERATED
WITHIN THE COMPANY**

AMERICAN PAN EUROPE S.R.L.

2022

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1. INTRODUCTION AND CONTEXT

According to the amendments provided in the Emergency Ordinance no. 92/2021 with regard to the waste regime, which repealed Law 211/2011, any economic operators carrying out a commercial or industrial activity, for which the competent authority for environmental protection has issued an environmental permit/integrated environmental permit, are obliged to draw up and to implement a programme for the prevention and reduction of waste generated from its own activity or, as the case may be, from any manufactured product, including measures that comply with a certain product design, and to adopt measures to reduce the hazardousness of waste.

The programme for the prevention and reduction of waste generated must take into account some basic considerations, namely:

- ✓ Management of resources and, respectively, on-site waste;
- ✓ Product design;
- ✓ Establishing measurable objectives and indicators;
- ✓ Voluntary targets and other instruments.

In the sense of the Emergency Ordinance no. 92/2021 regarding the waste regime, the meaning of some terms is presented below:

- ✓ *waste* - any substance or object that the owner throws away or has the intention or obligation to throw away;
- ✓ *waste holder* - the waste producer or the natural or legal person in their possession;
- ✓ *waste producer* - any person whose activities generate waste, waste producer or any person who performs pretreatment, mixing or other operations, which lead to changes in the nature or composition of this waste;
- ✓ *waste management* - collection, transport, recovery (including sorting) and disposal of waste, including supervision of these operations and subsequent maintenance of disposal sites, including actions taken as a trader or broker;
- ✓ *recovery* - any operation whose main result is the fact that the waste serves a useful purpose by replacing other materials that would have been used for a certain purpose or the fact that the waste is prepared to serve that purpose, in companies or in the economy in general.
- ✓ *disposal* - any operation that is not a recovery operation, even if one of its secondary consequences would be the recovery of substances or energy;
- ✓ *used oils* - all mineral oils or synthetic lubricants or industrial oils which have become unsuitable for the purpose for which they were originally intended, such as oils used in combustion engines and transmission systems, lubricating oils, turbine oils and hydraulic systems.

The activities carried out must always take into account a **hierarchy of waste management options**. The first option should be **to prevent the production of waste, by choosing from the design phase the best technologies**.

According to the definition in *GEO no. 92/2021 with regard to the waste regime*, prevention is represented by the measures taken before a substance, material or product becomes waste, which reduces:

- a) the quantity of waste, including by reusing the products or extending their lifespan;
- b) the negative impact of the waste generated on the environment and the health of the population;
- c) the content of hazardous substances of materials, by-products, products;

In the list of waste hierarchies, waste prevention is a priority. Prevention aims to encourage waste management in order to reduce its negative effects on the environment.

Waste management refers to the temporary storage, reuse, collection, transport, treatment, recycling and disposal of waste, the main purpose being the saving of the raw material by reusing recyclable waste, thus contributing to the reduction of pressure on natural resources.

Waste is divided into two broad categories: non-hazardous and hazardous and is defined by categories in *Commission Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Directive 94/904/EC establishing a list of hazardous waste pursuant to Article 1(a). (4) of Council Directive 91/689/EEC on hazardous waste*, as amended. Each type of waste is represented by a code consisting of 6 digits, depending on the generating activity, to which is added an asterisk (*) if it belongs to the category of dangerous ones (e.g. 20 01 35*).

All categories of waste are collected separately and handed over to authorized economic operators. At each waste delivery, the confirmation receipt or the waste loading-unloading form will be requested and kept following their delivery to the authorized collectors.

Producers / holders of waste are obliged to hand over the waste generated from their activity to the economic operators authorized by the competent public authority (County Environmental Protection Agencies) and to carry out operations of collection, transport, recovery and / or disposal of waste under the conditions of the environmental legislation in force, the non-compliance of this provision being sanctioned with a fine from 20,000-40,000 lei (*GEO 92/2021, art. 62, paragraph 1, letter a*).

The costs of waste management, including those related to the necessary infrastructure and its operation, are to be borne by the initial waste producer or by the current or previous owners of the waste according to the “the polluter must pay” principle (GEO 92/2021, art. 22, paragraph 1).).

The economic operators authorized for environmental protection for carrying out the collection and transport operations have the obligation to selectively collect the waste and to transport it only to the installations authorized for carrying out the treatment / disposal operations.

Waste producers and / or owners have the obligation to recover the waste in compliance with the hierarchy of options for their management and without endangering human health and the environment. Otherwise, the applicable sanctions are between 20.00-40,000 lei (GEO 92/2021, art. 62, paragraph 1, letter a).

Hazardous waste (the waste that is mentioned with an asterisk) must be stored separately depending on the physico-chemical properties, compatibility and nature of the extinguishing agents that can be used for each category of waste in case of fire, so that a high degree of protection of the environment and the health of the population, can be ensured, including ensuring traceability from the place of generation to the final destination. Failure to comply with the aforementioned requirements entails sanctioning with a fine of 20,000-40,000 lei (GEO 92/2021, art. 62, paragraph 1, letter a).

Traceability is awarded to the waste generator through waste management records in accordance with Annex 1 of HG856 / 2002. The waste management records should be prepared for each type of waste, should be sent annually to the environmental agency and are kept for at least 3 years (GEO 92/2021, art. 48 para. 5). Lack of aforementioned records entails the application of a fine between 20,000-40,000 lei (GEO 92/2021, art. 62, paragraph 1, letter a).

The present PROGRAM FOR THE PREVENTION AND REDUCTION OF THE QUANTITY OF WASTE, was elaborated by GREEN ENVIRONMENT SUPPORT in accordance with the requirements of the Emergency Ordinance no. 92/2021 on the waste regime, with subsequent amendments and completions, for the company AMERICAN PAN EUROPE S.R.L. based on the audit of the waste generated at the working point in Str. Dunarii, nr. 277, Corp C10, Alexandria Municipality, Teleorman County.

As a consequence of the inquires undertaken, the company developed and implemented a plan to reduce the quantities of generated waste, by ensuring the selective collection of recyclable waste, reuse and periodic delivery of recoverable waste to authorized companies and detailed control of products purchased/sold, thus reducing in particular the amount of waste that is handed over for final disposal in landfills.

2. CURRENT SITUATION

2.1. General data

NAME OF THE OPERATOR	AMERICAN PAN EUROPE S.R.L.
LEGAL REPRESENTATIVE	Str. Dunarii, nr. 277, corp C10, Municipiul Alexandria, Judetul Teleorman
VAT/ REGISTRY OF COMMERCE	RO 15058949 / J34/400/13.06.2005
LEGAL REPRESENTATIVE	Anca Ciaus
WORKING POINT	Str. Dunarii, nr. 277, corp C10, Municipiul Alexandria, Judetul Teleorman
ECONOMIC ACTIVITY (NACE)	2599 – Fabricarea altor articole din metal n.c.a
VERIFIED AREAS	Birouri, Depozit si Fabrica
NAME RESPONSIBLE / CONTACT	Anca Ciaus - aciaus@americanpan.com
DATA REGARDING THE DEVELOPER	
COMPANY NAME	GREEN ENVIRONMENT SUPPORT
COMPANY CONTACT DETAILS	Sos. Fabrica de Glucoza nr.9B, BC1203 020331, Sector 2, Bucuresti, Romania TEL 0765649435, E-mail contact@solutiidemediu.ro
DEVELOPER NAME	Alexandru Prodan
CONTACT DETAILS OF THE DEVELOPER	0785 285 720 / alexandru.prodan@solutiidemediu.ro

2.2. Date privind activitatatea desfasurata

The activities carried out by the company AMERICAN PAN EUROPE S.R.L. are the following:

- ✓ Production of trays used in the baking process
- ✓ Office activities

2.3. Data regarding the types of generated waste

The waste generated on site, specific office activities are:

Nr. crt.	Types of generated waste	Waste code	The source of waste generation	Method of management
1.	Mixed municipal waste	20 03 01	Offices, Kitchen	Disposal
2.	Paper and cardboard packaging	15 01 01	Offices, Kitchen	recycle
3.	Plastic packaging	15 01 02	Offices, Kitchen	recycle
4.	Fluorescent tubes and other mercury-containing wastes	20 01 21*	Offices, Kitchen	Recovery
5.	Waste printer toner containing hazardous substances	08 03 17*	Offices, Kitchen	Recovery

Table 1 Specific generated wastes

The generated waste, specific to the production activities of the trays used in the bakery process, are presented in the table below:

Nr. crt.	Types of generated waste	Waste code	The source of waste generation	Method of management
1.	Mixed municipal waste	20 03 01	The personnel in the production area	Disposal
2.	Paper and cardboard packaging	15 01 01	Personalul din zona de productie, aprovizionarea cu materii prime	Recovery
3.	Plastic packaging	15 01 02	Personalul din zona de productie, aprovizionarea cu materii prime	Recovery
4.	Metal packaging	15 01 04	Personalul din zona de productie, aprovizionarea cu materii prime	Recovery
5.	Wooden packaging	15 01 03	Personalul din zona de productie, aprovizionarea cu materii prime	Recovery
6.	Absorbents, filtering materials, polishing materials, protective clothing contaminated with dangerous substances	15 02 02*	Production process	Disposal / Recovery
7.	Pile and ferrous chip	12 01 01	Production process	Recovery
8.	Non-ferrous filings and chips	12 01 03	Production process	Recovery
9.	Halogen-free used emulsions and lubrication solutions	12 01 09*	Production process	Disposal / Recovery
10.	Waste sandblasting materials	12 01 17	Production process	Disposal / Recovery
11.	Non-chlorinated hydraulic mineral oils	13 01 10*	The machines in the production hall	Disposal / Recovery
12.	Non-ferrous metals	16 01 18	Production process	Recovery

13.	Iron and Steel	17 04 05	Production process	Recovery
14.	Aqueous sludges containing ceramic materials	08 02 02	Production process	Disposal / Recovery
16.	Aqueous suspensions containing paints and varnishes and organic solvents or other dangerous substances	08 01 19*	Production process	Disposal / Recovery
17.	Waste paint and varnish containing organic solvents or other dangerous substances	08 01 11*	Production process	Disposal / Recovery
18.	Fluorescent tubes and other mercury - containing wastes	20 01 21 *	Illumination of the production hall	Recovery
19.	Packaging that contains residues or is contaminated with hazardous substances	15 01 10*	Production process	Disposal / Recovery

Table 2 Specific generated waste

A good waste management can contribute to:

- ✓ improving resource efficiency - saving energy and reducing material consumption, by preventing, reusing and recycling waste;
- ✓ protecting public health through the safe management of potentially hazardous substances;;
- ✓ protection of ecosystems (soils, groundwater, air emissions).

1. MEASURES REGARDING THE MANAGEMENT OF THE WASTE GENERATED ON THE SITE

- ✓ Temporary storage of waste must comply with applicable law. All categories of waste must be stored in such a way that they do not affect the environment, in plastic / metal containers / bags, etc., labeled according to the waste code. Avoid the formation of stocks that could present a risk of fire, odors, etc. for neighborhoods;

No. Crt.	Waste name, according to EU Decision 955/2014	Waste code, according to EU Decision 955/2014	The correct way of storage
1.	Mixed municipal waste	20 03 01	Labeled plastic container,
2.	Paper and cardboard packaging	15 01 01	Labeled plastic or metal container
3.	Plastic packaging	15 01 02	Labeled plastic or metal container
4.	Metal packaging	15 01 04	Labeled plastic or metal container
5.	Wooden packaging	15 01 03	Bulk covered, labeled area
6.	Absorbents, filter materials, polishes, protective clothing contaminated with hazardous substances	15 02 02*	Metal container, provided with a retention tank in case of accidental spills, labeled
7.	Ferrous filings and chips	12 01 01	Labeled plastic or metal container
8.	Non-ferrous filings and chips	12 01 03	Labeled plastic or metal container
9.	Halogen-free used emulsions and lubrication solutions	12 01 09*	Metal container, provided with a retention tank in case of

			accidental spills, labeled
10.	Waste sandblasting materials	12 01 17	Labeled plastic or metal container
11.	Non-chlorinated hydraulic mineral oils	13 01 10*	Metal container, provided with a retention tank in case of accidental spills, labeled
12.	Non-ferrous metals	16 01 18	Labeled plastic or metal container
13.	Iron and steel	17 04 05	Labeled plastic or metal container
14.	Aqueous sludges containing ceramic materials	08 02 02	Metal container, labeled
16.	Aqueous suspensions containing paints and varnishes and organic solvents or other dangerous substances	08 01 19*	Metal container, provided with a retention tank in case of accidental spills, labeled
17.	Waste paint and varnish containing organic solvents or other dangerous substances	08 01 11*	Metal container, provided with a retention tank in case of accidental spills, labeled
18.	Fluorescent tubes and other mercury - containing wastes	20 01 21 *	Labeled plastic or metal container
19.	Packaging that contains residues or is contaminated with hazardous substances	15 01 10*	Metal container, provided with a retention tank in case of accidental spills, labeled

Table 3 Waste storage method and recommendations

- ✓ When handing over the waste, the proving forms regarding the traceability of the hazardous or non-hazardous waste are requested and kept according to the legislation;

- ✓ The formation of stocks that could endanger human health and harm the environment (risks of pollution of *water, air, soil, fauna, flora, odor generation, risk of fire for neighborhoods*) should be avoided;
- ✓ The transport of waste should be performed only by economic operators that hold an environmental permit according to the legislation in force for the activities of collection / temporary storage / treatment / recovery / disposal based on GD 1061/2008 on the transport of hazardous and non-hazardous waste in Romania;
- ✓ When handing over the waste, the forms for loading-unloading of non-hazardous waste (Annex 3) or the Hazardous waste shipment / transport form (Annex 2) will be filled in 3 copies, as the case may be, for each type of waste, in accordance with GD 1061/2008 on the transport of waste within the territory of Romania. They will be signed and stamped by, the generator, the transporter and the authorized collector / recovery / final disposer, a copy being returned to the waste producer (the generator, the one who delivers this waste). This copy may also be sent by fax or post, with acknowledgment of receipt, to the generator, which keeps it as part of the waste management records drawn up in accordance with GD 856/2002;
- ✓ In order to ensure the traceability of the generated waste, regardless of the category of waste handed over (non-hazardous or dangerous) the forms for loading-unloading non-hazardous waste or the forms for the dispatch / transport of hazardous waste must be completed in full, to have a number and series, the data of each operator involved, the category of waste transported, the code and the quantity collected, as well as the final destination (recovery / disposal);
- ✓ Also, the company holds the contracts with all the collectors that are authorized to take over the generated waste and their environmental authorizations, which mentions the activity of taking over, collecting, transporting waste in order to perform the recovery and / or disposal operations, and most importantly, the codes of the collected waste. If the waste is taken over for temporary storage at the collector's site (this is not the final recoverer / eliminator), it has the obligation to make available to the generator any and all data regarding the installation where the recovery / recycling / disposal operation will be performed (name of economic agent, environmental authorization, as the case may be the certificate of recovery / disposal of the received waste);

2. 2. MEASURES REGARDING THE PREVENTION AND REDUCTION OF THE QUANTITIES OF GENERATED WASTE

The activities carried out must always take into account a hierarchy of waste management options, according to fig. 1.

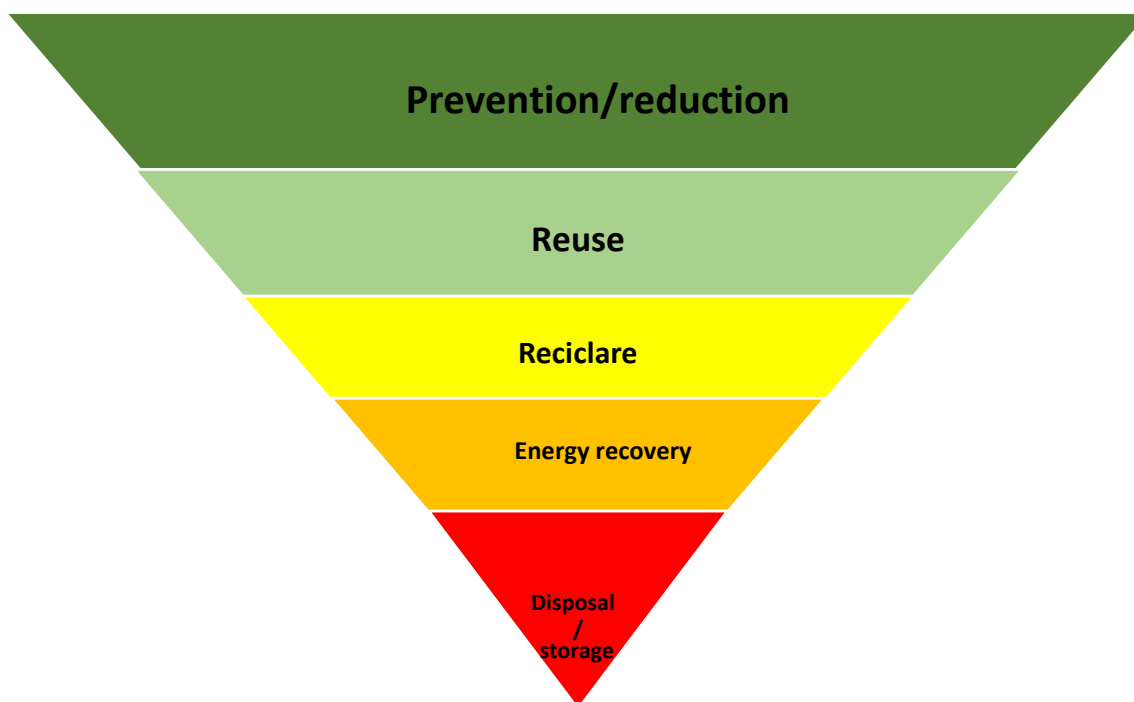


Figure 1 Waste management pyramid

The first option is to prevent waste production by choosing, from the design stage, the best technologies. If avoiding the production of waste is not always possible, then the amount of waste generated by reuse, recycling and energy recovery must be minimized. Thus, the selective collection of waste for its recovery contributes to the reduction of the amount of waste that is disposed of through storage.

The waste disposal stage must be applied only after the other means have been used until exhaustion, and responsibly, as not to produce negative effects on the environment.

The quantities of waste generated are centralized in the Registry of waste management that shall be filed monthly, in accordance with GD 856/2002 with regard to the evidence of waste management and for the approval of the list of waste, including hazardous waste. The report on the record of waste management is sent monthly and annually to the County Agency for Environmental Protection.

Specific measures regarding the prevention and / or reduction of the quantities of waste resulting from one's own activity can be achieved by implementing policies and practices such as:

- ✚ Efficient management of packaging (codes: 15 01 01, 15 01 02, 15 01 03, 15 01 04)

Measures:

- ✓ Optimal location and use of containers for selective collection of packaging waste generated on site;
- ✓ Purchasing unpackaged products or products without excessive packaging;
- ✓ Reuse of wood / metal / plastic packaging used for the transport of products sold and left on site after unpacking or returning them to the supplier for reuse;
- ✓ Encouraging imports of certain types of packaging for which there are recycling / recovery technologies;

Responsible: Anca Ciaus – Head of Legal

- ✚ Improving inventory control

Measures:

- ✓ Ordering products in minimum quantities to avoid the formation of stocks and their expiration;
- ✓ Restrictions on buying products that are overpackaged;
- ✓ Choosing suppliers who sell "green" products or biodegradable packaging.

Responsible: Anca Ciaus – Head of Legal

- ✚ Training of employees with regard to:

- ✓ The importance of preventing waste generation and the obligation to reuse products and selective waste collection;
- ✓ Awareness and increased attention regarding the verification of documents before printing in order to reduce the probability of printing documents that need revisions;
- ✓ Printing front and back where possible;
- ✓ Use of recycled paper;
- ✓ Using the database and other materials in electronic format, as well as electronic correspondence (invoices, addresses, contracts, works) and storing them in electronic format;

Responsible: Anca Ciaus – Head of Legal

- ✚ Reduction of the quantities of WEE:
 - ✓ Purchasing IT equipment (phones, laptops, etc.) to have compatible chargers to reduce the amount of waste they will generate when they are decommissioned;
 - ✓ Opting for the repair / reconditioning of electrical and electronic equipment and lamps in authorized services to prolong their life and to limit the purchase of new ones;
 - ✓ With regard to printing equipment, the purchase of such equipment to use a refillable cartridge / toner;
 - ✓ To check if the electrical and electronic equipment, batteries and lamps and other products imported from outside the European Union comply with European standards;
 - ✓ Opting for products / substances contained in a product with as little impact on the environment as possible in case of accidental pollution: to check the compounds of the respective substances, their effect on the environment and more environmentally friendly alternatives;
 - ✓ Deployment of a UPS voltage stabilization system to avoid damage to electrical equipment / lamps during electricity fluctuations;
 - ✓ Periodical verification of electrical and electronic equipment for the possible extension of their life;
 - ✓ Opt for the purchase of electrical and electronic equipment used in office activities of the reconditioned type, as long as they comply with the technical specifications for which they are intended to be purchased;
 - ✓ Opting for electrical and electronic equipment sold on a large scale for which you can easily find spare parts for their repair;
 - ✓ The use of electrical and electronic equipment within the limit of the production / daily use / e capacity (if this is written on the technical sheet of the product or on the warranty certificate).
 - ✓

Responsible: Anca Ciaus – Head of Legal

- ✚ Measures to reduce the amount of waste from products containing hazardous chemicals:
 - ✓ Collection by authorized operators can be done more often, in order to avoid the formation of large stocks of waste on the site;
 - ✓ Avoiding the formation of stocks of products with a short shelf life;
 - ✓ The use of packaging that presents a low risk of destruction and with higher volumes in the case of substances that are used in considerable quantities not only for small repairs in order to avoid generating a large quantity of contaminated packaging.

Responsabil: Anca Ciaus – Head of Legal

✚ Measures regarding the prevention and reduction of the quantities of waste oils:

- ✓ Avoid mixing waste oils with different characteristics and with other types of waste or substances, as this can lead to preventing their recovery / disposal;
- ✓ Keeping track of the oil consumed annually in order to track the progress and reduce the quantities used;
- ✓ Energy recovery of non-hazardous waste oils with the help of thermal power plants authorized in terms of environmental protection without causing atmospheric damage;
- ✓ Reuse of used oil to exhaustion as fuel for industrial machinery;
- ✓ The use of high-performance oils, which ensure extended exchange intervals and a significant reduction in consumption;
- ✓ Purchase of oil micro-filtration plants to remove solid contaminants, oil and water aging products, which can help extend oil change intervals and reduce the amount of generated waste oil .

Responsible: Anca Ciaus - Head of Legal

✚ Reducing the amount of residential waste:

- ✓ Selective collection of waste by type of material and their delivery to authorized collectors;
- ✓ Washing packaging in which food or other non-hazardous products have been purchased and recycling them;
- ✓ Concluding a contract for recyclable waste with the sanitation collector or with another authorized collector;
- ✓ Separate collection of vegetable and fruit residues in order to prepare for composting with own resources or handing over to an authorized collector.

Responsible: Anca Ciaus - Head of Legal

- ✚ Reduction of production waste:
 - ✓ Supply with raw materials that come in as few packages as possible;
 - ✓ Improving the technological flow by modernizing the production equipment so as to avoid as much as possible the production of non-compliant products or scrap;

Responsible: Anca Ciaus - Head of Legala