PUERTO DE MONTEVIDEO

ADMINISTRACIÓN NACIONAL DE PUERTOS
ÁREA SISTEMA NACIONAL DE PUERTOS
UNIDAD GESTIÓN DE MEDIO AMBIENTE

ECO SLC
Sustainable Logistic Chain

PORT ENVIRONMENTAL REVIEW SYSTEM (PERS)

Montevideo Port

2025

(Second Renewal)

Montevideo – Uruguay

1. PORT PROFILE

The Port of Montevideo is located on the shore of Río de la Plata river and it is geographically shaping up as the route for cargo transportation of MERCOSUR. It is the main port of the National Ports System of Uruguay and has been consolidated as a multipurpose port (containers, bulk cargo, fishing, cruise ships, transportation of passengers, vehicles, general cargo, etc.).

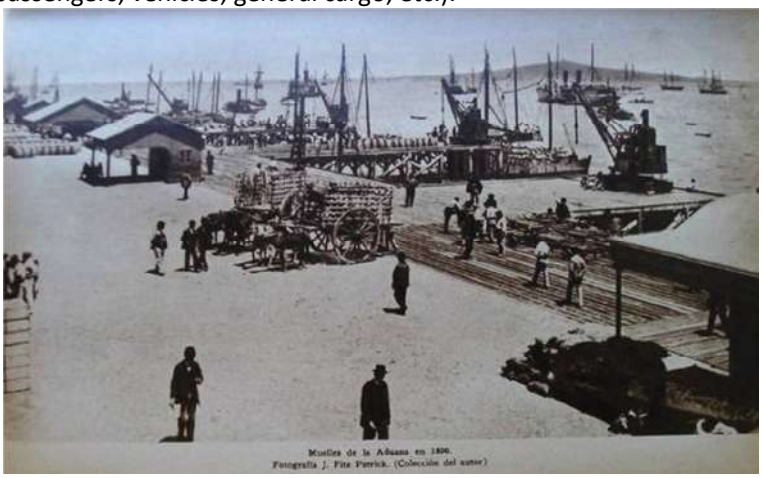


Fig. 1 - Port of Montevideo, year 1890.

The National Ports Administration (hereinafter referred to as "ANP") is the port authority in Uruguay, with the intervention of the corresponding Harbor Masters.

The Port of Montevideo has historically been defined as a military stronghold and strategic defense wall for the Viceroyalty of the Río de la Plata, which was based on the Port of Buenos Aires. Within that wall, business ventures started to develop related to the transport of goods by vessels from different places, and the inhabitants within said fortification started to carry out emerging activities related to exporting and selling bait, salted hides, sand for ballast, among others, to the vessels that arrived at the port. Those activities lead to a rapid development and the creation of the city of Montevideo. Over the subsequent centuries, the port and the city continued their expansion and the port-city relationship became so strong that: "*Without the bay and its port, Montevideo would not have had a purpose, it would not have existed.*"[1]

The Port of Montevideo had the important natural advantage of having a bay with natural shelter conditions ideal for a port, besides its depth and the infrastructure developed since 1901. The close relationship between the port and the city continued to grow over the years and underwent transformations in every respect: the port as a link in the maritime transport chain and the city as a social, industrial and commercial network. The industries established during that time in history, when there was no environmental awareness, generated elements that are part of the current environmental liabilities of the Bahía de Montevideo (Montevideo Bay). This situation is improving with the implementation of the environmental regulations in force, using different techniques and processes for its remediation.

ANP as port authority manages the Port of Montevideo and other 10 ports in Uruguay. The Port of Montevideo is the most relevant one from a commercial point of view, being a multipurpose port with terminals dedicated to containers, bulks, fishing, ship repair, etc. This operation, regulation and management network generates a sort of "sustainable industrial port activity."

[1] FERNÁNDEZ, José. Historia del Puerto de Montevideo (History of the Port of Montevideo). Montevideo, 2010.

Fig. 2 - Picture of the port area and the city.

Besides its natural conditions and infrastructure, the services and investment options it offers represent further competitive advantages.
The Port of Montevideo operates 24 hours a day, 365 days a year, and statistically the likelihood of strong winds and storms that may prevent operations is very low.

The Free Port system, which was implemented in Montevideo upon the entry into force of the Ports Law No. 16,246/92 and its Regulatory Decrees, caused Montevideo to become the first and only port of the Atlantic coast of South America to have a competitive logistics system for the transit of goods. This Law defined the ANP as a decentralized public body within the commercial domain of the State in coordination with the Ministry of Transport and Public Works (MTOP). The legal instrument that changed the national ports system states that ANP is responsible for enforcing it, encouraging the decentralization of Uruguayan ports, ensuring the coordination of any activities carried out in said ports and making sure that services are provided based on a free competition system. Article 1 of said Law states that the provision of efficient and competitive port services is a priority objective for the development of the country. It also sets forth that ANP is responsible for managing, maintaining and developing the Port of Montevideo, as well as for advising the Executive Branch on port issues, being entitled to submit proposals in that regard. It also establishes that ANP's Board of Directors has the authority to conduct construction works and, with the approval of the Executive Branch, to grant concession agreements, permits or authorizations for the performance of land and maritime port services.[2]

Port customs areas in which there is a free movement of goods and where the special tax and customs systems set forth in the Ports Law are applicable are considered free ports (Decree No. 455/94).

Maritime or land port services are the public, private or mixed activities carried out within the port area by natural persons or legal entities authorized for such purpose (Decree No. 412/92 and Decree No. 57/994).
The port services provided are classified as follows: vessel services, goods services, and passenger services.

ANP is a public company founded more than a hundred years ago. During those years, it has been under different managements based on port development goals set by different government authorities.

[2] AMOZA, Edgardo. Autoridades Portuarias Americanas (American Port Authorities), Montevideo, 2017.

The business model of the Port of Montevideo has led to its configuration as a Land Lord Port. Currently, the management of the Port of Montevideo is not based on a Land Lord Port model in its entirety, but on a mixed model where ANP is the port authority that owns the port as a whole and services are largely provided by private companies under concession agreements or permits for its exploitation in exchange for fees. The port is divided into independent terminals and port operators that perform their tasks in public multipurpose docks in which ANP also provides operational services according to their needs.

The current model is a result, to a greater or lesser extent, of State policies that consider port management based on integrated transport systems, logistics platforms and complex international production and distribution networks. The need for specialization of port services leads to the combination of a great variety of services and activities. The adaptation to increasingly fast technological advances generates the need to optimize time and improve performance, in line with stricter environmental regulations. The administrative efficiency of State agencies involved in port activities is crucial for the survival of ports.[3]

The port community includes public and private bodies, unions and the civil society, where ANP provides a place for negotiations and fostering relations. The Port Environmental Management Executive Committee (CEGAP) plays a relevant role in environmental matters as a management instrument to promptly resolve pressing environmental issues. This way of resolving matters is based on a cross-sectoral approach, as members of said committee (experts) are appointed by the corresponding bodies' authorities (public and private), and all environmental regulations to be applied to port operations (protocols, instructions, manuals, etc.) are approved unanimously and democratically.[4]

As mentioned above, the city and the port are integrated and their interrelation is crucial for the environmental aspects of port activities.

Mission/Vision

ANP's mission was determined by its Management Team under its Strategic Planning, as part of the vision for the country set forth in the government program and based on the values established for its performance:

"To position Uruguay as a logistics hub to link the region with the rest of the world based on the sustainable productive development of the country."

[3] AMOZA, Edgardo. Reforma del Estado en el ámbito portuario. Anuario de Derecho Administrativo (State reform in the port sector. Administrative Law Yearbook), Montevideo, 1998.

[4] VALLEJO, Ricardo. La protección ambiental en los puertos comerciales del Uruguay, Revista Uruguay Portuario AÑO IV, número 8 (Environmental protection at the commercial ports of Uruguay. Uruguay Portuario Magazine, 4th year, issue No. 8). Montevideo, 2017

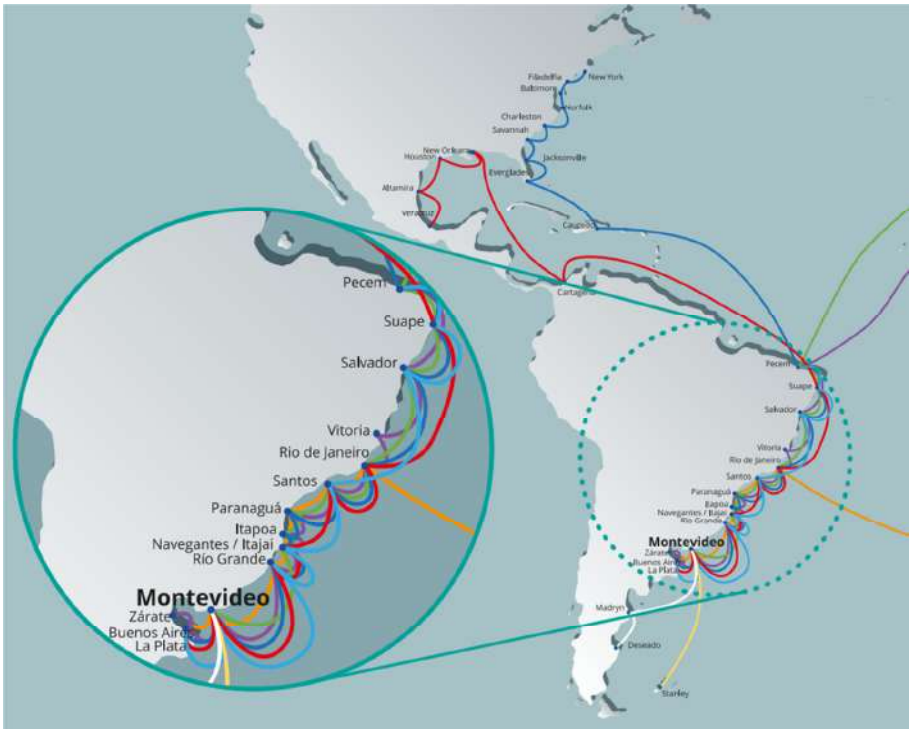


Fig. 3 - Connections of the Port of Montevideo, publication in *Uruguay Portuario* Magazine, issue No. 13 (ANP, 2023).

SERVICE (mostly weekly)	OPERATOR	Number of vessels per service	Carriers loading on these vessels	Port Destination Zone
IPANEMA	TCP	13 = 5 MSC + 4 Hapag + 4 ONE	HSDG, Hapag Lloyd, Maersk, Sealand, MSC, ONE, ZIM	Far East
NEW ASA I	TCP	13 Maersk	Maersk, HSDG, Hapag Lloyd, Hyundai MM, ONE, ZIM	
FAR EAST	MONTECON	COSCO: 4 + Evergreen	CMA-CGM, COSCO, Evergreen, Yang-Ming	
FIL (biweekly)	MONTECON	12 = 12 HMM	HMM (Hyundai Merchant Marine)	
MSC NORTH EUROPE (NWC I)	MONTECON	9 = 7 MSC + 2 Hapag	HSDG, Sealand, Hapag Lloyd, MSC, CMA-CGM	Northern Europe
NEO SIMBA	TCP	8 Maersk	Maersk, HSDG, CMA-CGM, COSCO, Hapag Lloyd, MSC, Hyundai MM	
GRIMALDI (biweekly)	MURCHISON	7 Grimaldi	Grimaldi	
LUX	TCP	8 = 5 COSCO + 3 ONE	COSCO, ONE	
MSC WEST MEDITERRANEAN	TCP	8 = 7 MSC + 1 Hapag	MSC, Hapag Lloyd, ZIM	Mediterranean
MSC USA GULF	TCP	8 MSC	MSC, ZIM	USA East Coast
TANGO (weekly for refrigerated fruit)	TCP	8 = 6 Maersk + 2 Hapag	Maersk, Sealand, Hapag Lloyd	
SANTA URSULA / ASIA CUB / ASIA LOOP 1 / LOOP 2	TCP	8 = 6 Hapag + 2 ONE	Maersk, Hapag Lloyd, ONE, ZIM, Sealand	Caribbean & Gulf
PLATA SERVICE (biweekly)	MONTECON	4 = 2 Mercosul + 2 Login	CMA-CGM, Mercosul, LOGIN	Brazil
PATAGONIA EXPRESS	TCP	2 Maersk	Maersk, Sealand, HSDG	Patagonia
SW6 (weekly for refrigerated cargo)	TCP	1 = 1 SW6	SW6 (South America Atlantic SE)	Falklands

Table 1: Frequency of shipowners that connect to the port of Montevideo.

1.2 Strategic Guidelines

For the 2018-2035 period, ANP set out its strategic guidelines in the Port of Montevideo Master Plan, which states as a main principle that *"National port development shall be environmentally sustainable, in line with the growth of the city and its surroundings."* In this way, ANP reaffirms its commitments to the protection of the environment.

1.3 Infrastructure

The area of the Port of Montevideo covers approximately 140 hectares (between operational areas and on-going works) for multipurpose storage berths. More than half of said area is dedicated to logistics operations at berths that have double-track rail connections. Additionally, the Logistics Port, located at Punta de Sayago, at the western side of the bay, has an area of 110 hectares.

To protect its activities, the Port of Montevideo has two breakwaters: the 1,300-meter Western Breakwater, which protects the terminal from southwest (pampero) winds, and the 900-meter Eastern Breakwater (Sarandí), which protects it from south and southeast winds. These structures also protect the port entry and exit, which is 320 meters wide, measured between the ends of the breakwaters, as well as the 200 hectares of the outer harbor for vessels at anchor or circulating towards the docks to

carry out operations. There is also a third protection structure: the offshore breakwater that is 2,000 meters long and enables safe operation at the docks 24 hours a day throughout the year, because it protects them from north winds and controls hydrodynamics.

Fig. 4 - Map of the Port of Montevideo with developing areas in color (see Annex).

DOCKS OF THE PORT OF MONTEVIDEO				
STRUCTURE	CONCESSIONAIRE	NUMBER OF BERTHS	LENGTH (m)	DEPTH (m)
TCP (Dock of Call)	Dedicated Container Terminal	Call New 1	350	14
		Call Old 2	283	14
Tebetur (UPM)	Cellulose Terminal	Tebetur Dock	365	13
TGM	Specilized Dry Bulk Terminal	TGM Dock	___	13
Dock C	Multipurpose	C Dock	330	12
Central Dock (Basin 1)	Multipurpose	3, 4 and 5	496	11
Dock B	Multipurpose	Head of Dock B	154	11
		6 and 7	294	
Basin 2	Multipurpose	8 and 9	328	11
Central Dock (Basin 2)	Refrigerated Warehouse	10 and 11	390	10
Dock A (Basin 1)	Multipurpose	Head of Dock A	50	10
		1 y 2	309	
Maciel Dock	Passenger Terminal	Maciel Berth	382	7
River Basin	National Navy	Navy Berths Base	353	7
Florida Dock	International Fishing	Florida Dock	90	7

1.4 Scale of the Port Business

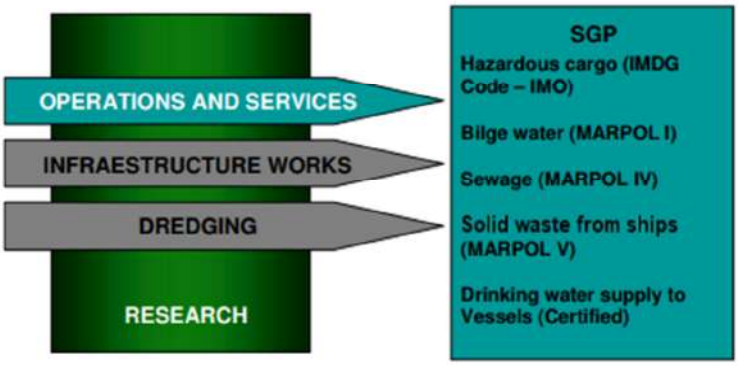
Activity of the Port of Montevideo					
Type	2020	2021	2022	2023	Average 2021 – 2023
Berthed Vessels	2.380	2.558	978	1.008	1.515
Cruise Ships	100	18	73	156	82
Passengers on Board	168.296	1.203	29.202	253.789	94.731
Embarked Passengers	7.074	212	1.380	11.976	4.523
Containers	471.998	576.470	631.263	649.779	619.171
Handled TEUS	779.054	976.506	1.093.524	1.124.570	1.064.867
Cars (Load / Unload)	41.688	68.059	75.871	90.407	78.112
Bulk Tonnes	1.986.968	1.778.212	2.410.259	2.202.960	2.130.477
Logs Tonnes	1.615.577	2.733.119	1.597.829	1.077.084	1.802.677
Wood Chips Cargo	208.970	770.483	988.737	895.452	884.891
Handled Tonnes	14.008.405	18.009.691	17.489.875	18.392.966	17.964.177
Handled Tonnes Without Container	8.010.533	9.805.189	9.355.375	9.886.438	9.682.334
River Passenger Transport	2020	2021	2022	2023	Average 2021 – 2023
Embarked Passengers	96.140	72.961	274.064	306.954	217.993
Disembarked Passengers	87.668	65.166	252.076	291.513	202.918
Loaded Cars	14.304	15.665	34.421	36.561	28.882
Unloaded Cars	12.453	11.820	30.958	34.334	25.704

1.5 Key areas of the Environmental Management System

The Environmental Management System of the Port of Montevideo, which is submitted to the Port Environmental Review System (PERS) for certification, is based on four pillars or main areas: operations and services, infrastructure works, dredging and research.

Fig. 5 - Basin 1 of the Port of Montevideo during cruise ship operations.

1.5.1 Operations and Services



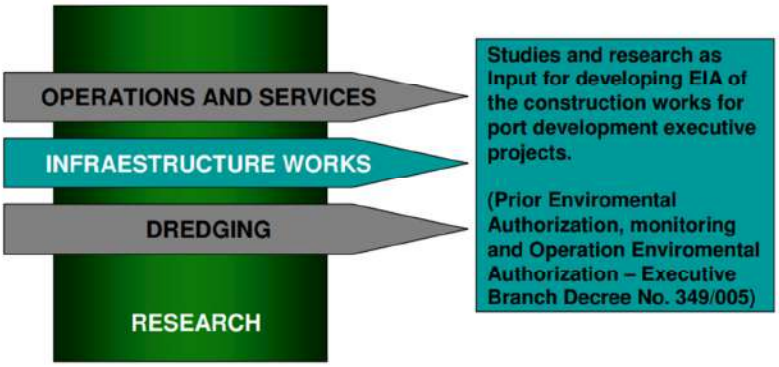
Port services, which are provided to vessels, goods and passengers, supply and logistics services, as well as services in general, cover key environmental aspects, mainly related to vessel waste management, which are regulated by the MARPOL Convention 73/78. This international Convention was ratified by Uruguay under Law No. 17,555.

Port operations include all activities carried out on a day-to-day basis within the port area that are necessary for its proper operation, such as vessel and cargo-related activities, as well as administrative, maintenance, cleaning, supply and emergency (medical service, firefighting, safety and security, spills, etc.) activities.

Within the Management System at the Port of Montevideo, the Port Environmental Management Executive Committee (CEGAP), which includes experts appointed by ministries, public and private bodies, unions, the civil society, etc., related to the port sector, creates operation protocols. The CEGAP was adopted as a proper legal instrument to promptly and practically address pressing environmental issues through technical procedures approved and legally adopted by the whole port community.[5]

Therefore, the CEGAP is the main management tool adopted within the Environmental Management System to act effectively, efficiently and productively when making strategic decisions for the port managed by ANP, and its application has an effect on the sustainable development of the country.

1.5.2 Infrastructure Works



All port development works are carried out under a government strategic master plan, managed through executive projects, and led by Construction Managers and the Environmental Technical Manager. Construction Managers are in charge of submitting executive projects according to a port and

[5] VALLEJO, Ricardo. Comité Ejecutivo de Gestión Ambiental, Revista Uruguay Portuario AÑO IV, número 8 (Environmental Management Executive Committee, *Uruguay Portuario* Magazine, 4th year, issue No. 8.) Montevideo, 2017.

maritime engineering methodology that is associated with the Environmental Impact Assessment (EIA) for each work, which is submitted by the Environmental Manager to national control agencies.

The EIA is an environmental management preventive instrument in Uruguay which involves a technical and participatory procedure for the identification and assessment, in advance, of the environmental consequences of a project that has not been implemented yet in order to eliminate, mitigate or remedy any negative environmental impacts.

The environmental authority, through its experts, assesses the studies submitted for construction, operation and abandonment.

The EIA assessment includes all environmental aspects of the economic and social initiatives, protected areas, landscape, i.e., the most relevant aspects for project classification. All projects shall be classified into one of the following three categories:
Class “A”: includes projects related to activities, construction or works that would only have non-significant negative environmental impacts as provided for in the regulations in force.
Class “B”: includes projects related to activities, construction or works that may have moderately significant environmental impacts and these negative effects might be eliminated or minimized by adopting well-known and easily applicable measures. In this case, an Environmental Impact Assessment shall be carried out.
Class “C”: includes projects related to activities, construction or works that may have significant negative environmental impacts, whether or not there are any prevention or mitigation measures in place. Said projects require a comprehensive Environmental Impact Assessment.

The EIA has contributed to raise general environmental awareness pursuant to the principles of the national environmental policy set forth in Laws No. 16,466/1994 and 17,283/2000 regarding environmental protection, making early precautionary actions possible. The flow chart below describes the process for determining the project classification, Environmental Impact Assessments, category, Prior Environmental Authorization (AAP) application, review and assessment by DINACEA, approval, public release, resolution by the Ministry of Environment to begin works and the Environmental Authorization for Operation (AOO) when operations start.
The EIA for infrastructure works was designed taking into account quantitative impacts. Therefore, every project shall have a positive, negative or neutral value. In case it is significantly negative, a Strategic Environmental Assessment is carried out together with the Board of Directors, General Management and Infrastructure Management, and the project might be discarded, under the “statu quo” concept.

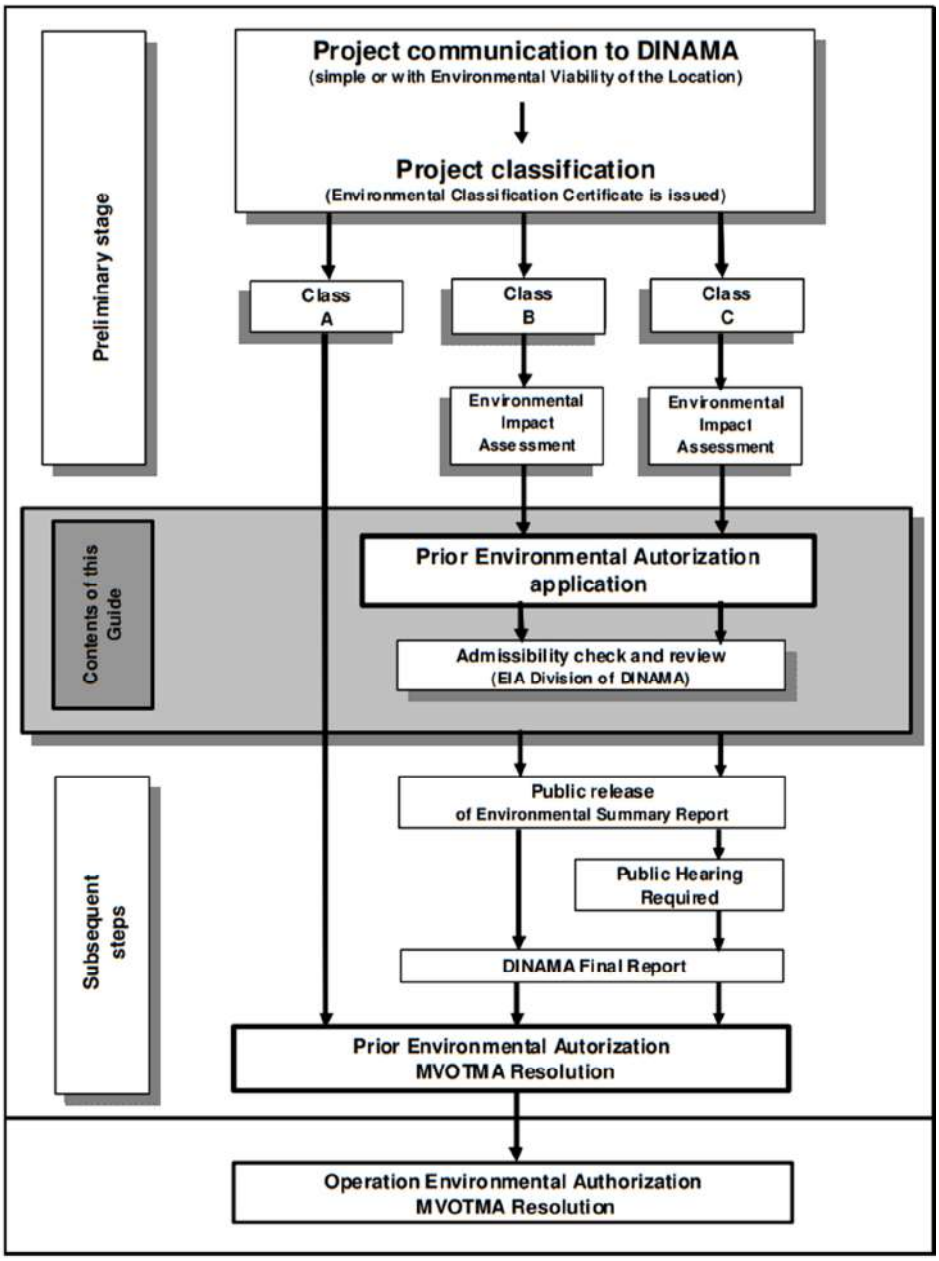
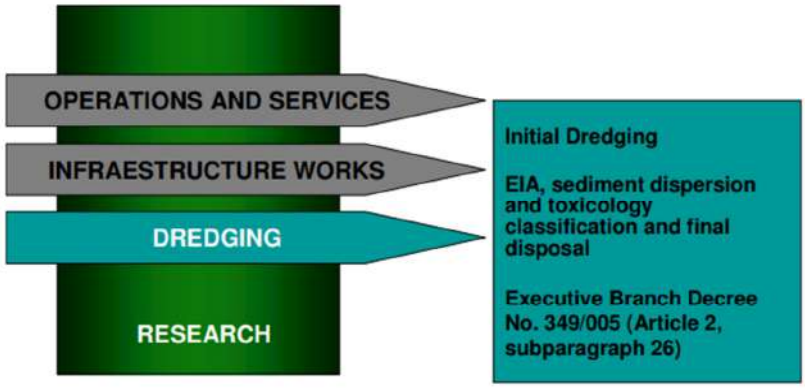


Fig. 6 - Environmental Authorization assessment flow chart

1.5.3 Dredging



Dredging operations at the Port of Montevideo are a highly sensitive environmental aspect in terms of sludge removal, extraction and disposal, which require specific toxicology studies and geotechnical tests, underwater archaeological heritage analysis, etc.

Dredging of docks and navigation channels implies an environmental aspect which is taken into consideration in all studies conducted under the Management System in order to prevent impacts on the port, maritime and coastal environment.

The environmental authority (DINACEA) divides dredging into two categories: initial dredging and maintenance dredging.

1.5.3.1 – Initial Dredging

Initial Dredging is any dredging required to place a port infrastructure (for example: dock, navigation channel, maneuvering area, etc.) in a port area to be extended that was never dredged and which requires an Environmental Impact Assessment (EIA) as well as Prior Environmental Authorizations and Operation Authorizations pursuant to the provisions of Decree No. 349/05 (Article 2, subparagraph 26). Said dredging requires research as detailed in item 1.1.4.

Depending on sediment toxicology studies, the method to be used for final disposal of the dredged materials is assessed and adopted, based on mathematical models for dispersion, currents sedimentation, swell, wind, etc., to determine the dredge plume.

1.5.3.2 – Maintenance Dredging

It is carried out regularly according to a set schedule and the bathymetry is uploaded as layers to the Geographic Information System SIGPORT (http://sigport.anp.com.uy) of the Port of Montevideo.

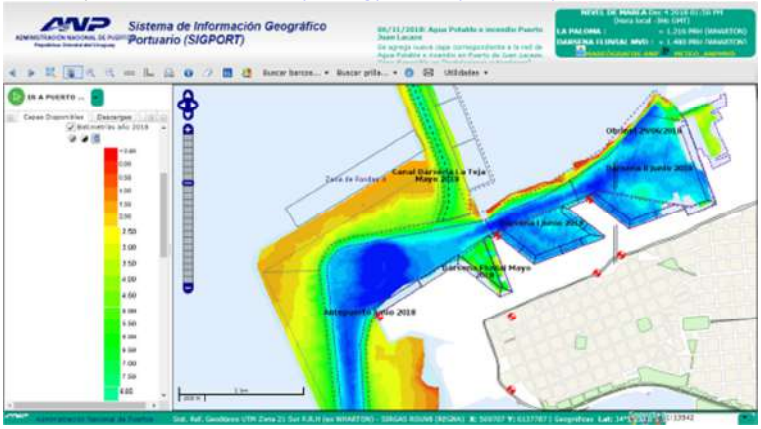


Fig. 7 - Dock and channel bathymetry

Dumping and disposal sites for this type of maintenance dredging are also shown in this application as follows:

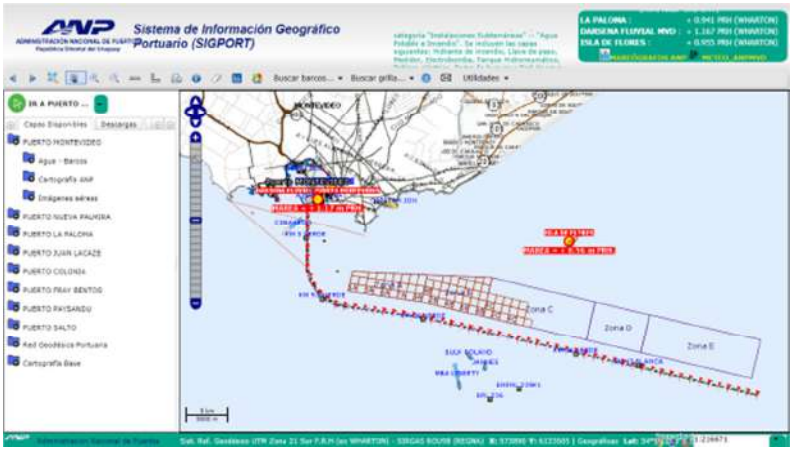
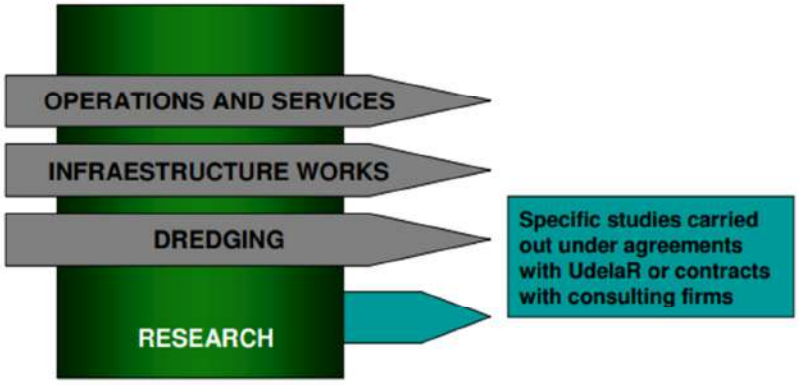


Fig. 8 - Dredged material dumping sites

These dumping sites were determined by hydrodynamic studies carried out by the Fluid Mechanics and Environmental Engineering Institute (IMFIA) of the Faculty of Engineering (Fing) of the University of the Republic (UdelaR) through agreements signed for such purpose.

1.5.4 Research



Regarding research, the Environmental Management System directly or through agreements with the University of the Republic (hereinafter referred to as “UdelaR”) or consulting firms gathers and analyses the necessary information to comply with environmental requirements using a budget specially allocated for such purpose. Specific studies carried out through agreements with UdelaR (Faculty of Engineering and Science) are very important for achieving continued improvements in the Environmental Management System or for conducting innovation projects.

Environmental studies conducted by ANP or through agreements with other institutions within the last 10 years:

Year:	STUDIES
2007	a) *Prospective environmental assessment of the Montevideo Bay and port development projects.* Agreement with UdelaR/Fing – IMFIA. b) *Studies on the thermodynamic impact of the water intakes of the Batlle Power Plant of the* State-owned electrical power company *(UTE).* Agreement with Udelar/Fing – IMFIA. c) Internship research on *Particulate matter in the air in bulk unloading (sulfur – wood chips and barley)*. Intern: Ana Gini; Supervisors: Prof. Eng. Raúl Prando of the Faculty of Engineering and Lic. Ricardo Vallejo of the ANP. d) *Noise monitoring in the port area, ANP's ships (dredgers and boats), the engine room and other compartments of the vessels that operated at the Port of Montevideo.*
2008	a) Sediment *toxicology at Puerto Sauce, Punta Sayago, and the anchorage area, and water quality of commercial docks of the Port of Montevideo in physical and chemical parameters.*
	b) *Environmental and structural pre-feasibility analysis of berths and protection works at a LNG port terminal in Punta Sayago, Montevideo* (UdelaR/Fing/IMFIA).
	c) *Environmental study at Puerto Capurro fishing terminal and other services at the riverbed of the Montevideo Bay* (UdelaR/ANP/Fing/IMFIA).
	d) Technical support for disasters occurred at the port area such as hazardous goods spills, vessel fuel spills and spills from docks, working together with the National Naval Prefecture (PNN), National Fire Department (DNB), Ministry of Public Health (MSP), Ministry of Livestock, Agriculture and Fisheries (MGAP), Municipality of Montevideo (IM), etc.
	e) Environmental analyses of the ports of Salto, Paysandú and Juan Lacaze (Puerto Sauce), which are part of the National Ports System (SNP), as a basis for river and sea revitalization in the country.
	f) Implementation of the REPAPEL project to support public schools and the CAIF (Child and Family Care Centers) Plan in the area around the Montevideo Bay.
2009	a) New technologies: Analysis and advice to the management team on new projects and innovative technologies for the sustainable development of ports.
	b) Environmental Impact Assessment (EIA) of Puerto Capurro National Module, EIA of bulk terminal.
	c) Environmental viability study and analysis of International Module for Puerto Capurro by private initiative.
	d) Sediment toxicology monitoring at anchorage area to the north of the offshore breakwater.
	e) *Study regarding the impact of the embankment constructions to the north of Dock 10 on the water intake of the Batlle Power Plant* (UdelaR/ANP/Fing/IMFIA).
	f) *Environmental analysis of the impact of the demolition of buildings at the Port of Colonia on the berthing conditions* (UdelaR/ANP/Fing/IMFIA).

2010	a*) Water quality of the commercial docks of the Port of Montevideo in physical and chemical parameters, studies regarding biological indicators*. Faculty of Science and Sectoral Commission of Scientific Research (CSIC) of the University of the Republic
	b) *Development of environmental quality indicators in situ for the aquatic ecosystem of the Port of Montevideo and determination of inputs to the aquatic environment arising from dry bulk operations*. (Faculty of Science and CSIC).
	c) *Assessment of embankments on soft soil at the Montevideo Bay* (UdelaR/ANP/Fing/IMFIA).
	d) *Assessment of the application of geotextile containers for dredged materials at the Montevideo Bay* (UdelaR/ANP/Fing/IMFIA).
2011	a) *Study on the extension of the Punta Sayago Port* (UdelaR/ANP/Fing/IMFIA).
	b) *Analysis of alternatives for the Punta Sayago Port* (UdelaR/ANP/Fing/IMFIA).
2012	a) *Hydrodynamic and hydro-sedimentological study of Bahía de Montevideo* (UdelaR/ANP/Fing/IMFIA).
	b) *Study of the nautical bottom at the Port of Montevideo*. (UdelaR/ANP/Fing/IMFIA).
2013	a) *Toxicological study of the effluent from geotextile containers filled with dredged materials at the Montevideo Bay* (UdelaR/ANP/Fing/IMFIA). b) *Analysis and development of a risk model for goods in transit at the Port of Montevideo* (UdelaR/ANP/Fing/Probability and Statistics Laboratory – LPE). c) *Specific study on the pre-feasibility analysis of berths and protection works at Punta Sayago* (UdelaR/ANP/Fing/IMFIA).
2014/ 2015	a) *Study on the gas emissions from vessels and other sources of pollution with greenhouse effect at the Port of Montevideo* (UdelaR/ANP/Fing/Institute of Physics).
	b) Specific studies:
	b.1) Determination of physical and chemical parameters of water quality, determination of zooplankton community indices (diversity and abundance), content of chlorophyll a, population indices of the nekton community.
	b. 2) Determination of community indices in sediments, environmental quality (AMBI – BENTIX) of the macrobenthic fauna; ECOTOX (UdelaR/ANP/Fcien/Oceanography).
2016	a) Regular water quality monitoring (physical and chemical) at the commercial docks. (ANP/SNP/UGMA) *
	* This activity started in 2007 as a pilot plan. It has been carried out on a monthly basis since 2011 and records of each campaign are kept.
	b) New framework agreement reached between UdelaR/ANP.
2017	a) Specific study on greenhouse gas emissions from vessels, sensitivity map by dock and innovation in the manufacture of a prototype for measuring gas emissions that will be the basis for the doctoral thesis of Engineer Matías Osorio. Upon completion of the study, the equipment obtained for such purpose will belong to the Port of Montevideo.

	b) Specific studies on tide levels in port areas of Uruguay from the Port of Montevideo to the Port of Paysandú.
2018/ 2019	a) Specific study regarding measurement of meteorological variables, particularly wind, at the Port of Montevideo and proposal of operation criteria.
2022	Characterization and classification of sediments for a new maneuvering area at the outer port of Montevideo.
2023	a) Archaeological evaluation and archaeological adaptation plan (Kateon Natie-TCP, EIA). b) Analysis of the effect on the waves of the deepening and extension of the access channel to the Port of Montevideo (FING-IMFIA). c) Effect of the expansion of the access channel on the circulation of the area (FING-IMFIA). d) Characterization studies of the bed and subsoil materials of the access channel to the Port of Montevideo, longitudinal and transversal seismic profiles, geological, geotechnical and chemical studies (EIA, GeoM-uy).
2024	a) Sediment Studies in Montevideo Bay (ANP). b) Study of the discharge of dredged material (FING-IMFIA). c) Characterization of the behavior of sediments during dredging activities based on measurement campaigns (FING-IMFIA). d) Study of agitation in Dock A for widening of Freu A (FING-IMFIA).

On top of the aforementioned studies, upon request of the Environmental Authority (DINACEA) or ANP's Environmental Manager, any necessary specific studies shall be carried out, such as monitoring of the variations in physical and chemical parameters of water, heavy metals, total suspended solids, total hydrocarbons and dissolved oxygen in the project area, as well as biological indicators, geotechnical tests of the soil that might provide data on environmental liabilities (heavy metals, total hydrocarbons, PCBs, aquifers, etc.).

Also, within the Environmental Management System, a monthly physical and chemical monitoring of water quality is carried out at the commercial docks of the Port of Montevideo. Besides, PM_{10} particulate measurements are made for dry bulk operations. We have been working with the different operators to adopt good practices for such operations in order to reduce their environmental impact.

2. ENVIRONMENTAL POLICY STATEMENT (Section 1.1 of PERS)

ANP's General Management, through the Environmental Management Unit, verifies that legal and regulatory requirements of all stakeholders are identified, known, updated and met, and makes sure that all the procedures properly and effectively identify the relevant environmental aspects in order to apply preventive, corrective or improvement measures.
Regarding the impacts associated with climate change, the Port of Montevideo has not yet developed a specific local policy or analysis of its effects on port operations, despite the Port Authority's recognition of the importance of this issue.

In this regard, it is important to highlight that the National Port Authority adheres to the national climate change policies established by the Climate Change Directorate of the Ministry of Environment of our country, which guide the environmental planning of our port, in line with the country's international commitments, such as the Paris Agreement and the United Nations Framework Convention on Climate Change (UNFCCC).

The Environmental Policy includes a series of Environmental Principles adopted by the National Ports Administration, which provide the general framework for management and a guideline for the Environmental Policy. Said principles are as follows:

2.1 ENVIRONMENTAL PRINCIPLES STATEMENT

The National Port Administration, as an essential actor in achieving the most appropriate sustainable port development and therefore directly supporting Uruguay's commercial activities, undertakes to:

1) *Respect current national environmental legislation as well as those conventions, guidelines, and resolutions internationally ratified by the Eastern Republic of Uruguay and aimed at protecting the port environment.*
2) *Act, in accordance with the Constitution, the Law, and other Agreements, in accordance with the ethics of sustainable development.*
3) *Take voluntary measures to consider, whenever possible and appropriate, the timely application of domestic environmental standards in accordance with the Law.*
4) *Oversee, through its General Management, environmental policies and measures in accordance with the guidelines issued by the Institution's Board of Directors.*
5) *Establish an Environmental Management System to introduce environmental protection as an integral part of business and management practices. The Environmental Management System (EMS) will aim to:*

- *Promote environmental ethics among port stakeholders, associated entities, or those related to them, and encourage the importance of individual responsibility in general and, specifically, in the application of the EMS.*
- *Establish response plans to address any potential incident in port areas, minimizing negative environmental impacts on river, marine, and land areas that could cause damage to the marine and coastal ecosystem and the environment in general.*
- *Conduct periodic reviews and revisions of the Environmental Policies and the Environmental Management System, taking into account the results of the most recent research related to the environment and trade dynamics.*
- *Provide all personnel with the necessary support to adopt proactive attitudes regarding environmental issues, emphasizing that the maintenance and preservation of environmental quality is the responsibility of all those who perform tasks in the Company.*
- *Integrate the environmental dimension into the Company's plans, programs, activities, and operations at all stages.*
- *Promote the most appropriate integration of ports into the respective cities.*
- *Incorporate procedures that guarantee compliance with current national and departmental*

environmental regulations.

• Adopt the necessary actions to implement comprehensive compliance with environmental guidelines, including those of MERCOSUR, IMO (MARPOL 73/78), relevant ISO standards, and the environmental directives of the World Trade Organization.

• Provide, whenever possible, adequate resources to support research on environmental issues related to the sector's activities.

• Constantly seek options for improving port environmental issues by studying and analyzing the most developed ports around the world, using the benchmarking methodology.

• The Environmental Management System will be a tool used to improve environmental parameters, such as air quality monitoring, and will allow for the establishment of corrective measures if necessary. This Environmental Management System will also aim to establish goals to reduce sources of pollution. It will also be a priority to work on optimizing port waste management as much as possible, initially promoting reduction and, if not possible, working toward waste recovery (recycling).

• The objective will be to participate in the development of proactive port development strategies, seeking to minimize the environmental impact that implementing actions that contribute to port development can have on the growth of the city.

• Monitoring mechanisms will be established for the quality of marine sediments, in order to protect ecosystems within the port's area of influence, as well as to control relevant parameters in the sediment disposal areas corresponding to dredging.

6) *Promote training for all ANP officials and those involved in port operations in environmental preservation and good practices.*
7) *Constantly seek environmental improvement at the Port by studying and analyzing other, more developed ports around the world using the benchmarking methodology.*

Approved by the Resolution of the Board of Directors 661/3,268 on 18/Dec/2002 (File No. 021758)
Updated by the Resolution of the Board of Directors 172/3,974 on 27/Mar/2019 (File No. 182118)
Updated by the Resolution of the Board of Directors 421/4,267 on 17/Jul/2025 (File No. 251462)

ADMINISTRACIÓN NACIONAL DE PUERTOS
República Oriental del Uruguay

ENVIRONMENTAL POLICY OF THE PORT OF MONTEVIDEO

Montevideo, 17 July 2025.

The Port of Montevideo acknowledges its responsibilities regarding environmental prevention and preservation as outlined in the Environmental Principles of the National Ports Administration. Therefore, it commits to:

1. *Adopting, documenting, implementing, and maintaining the necessary measures to minimise environmental impacts that may result from port operations in general.*

2. *Setting goals and objectives aimed at controlling emissions to land, sea, and air, striving for continuous environmental improvement of port activities within its scope. This requires the identification and control of the port's significant environmental aspects.*

3. *Recording all activities defined within management processes to serve as indicators of environmental performance.*

4. *Complying with and closely observing all environmental legal requirements, standards, and procedures within its direct jurisdiction and in its concession areas. This includes preventing adverse environmental effects, safeguarding the community, businesses, the port community, and the general population. Where possible, environmental standards will be improved beyond the requirements of legislation.*

5. *Maintaining an inventory of relevant environmental legislation and regulations, whether national, international, or derived from commitments undertaken. This inventory will be updated annually at the latest by the competent offices.*

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ADMINISTRACIÓN NACIONAL DE PUERTOS
República Oriental del Uruguay

6. Establish the necessary communication channels to broadly disseminate to staff, suppliers, concessionary companies, and society as a whole the procedures, established standards, and environmental programs through the publication of a biennial report (every 2 years) that outlines progress and new environmental requirements. This includes publishing environmental performance on our website.

7. Ensure the availability of the necessary resources for the implementation of the Environmental Policy so that port services meet the requirements that guarantee minimal environmental impact through their monitoring, in order to protect port areas and adjacent zones.

8. Promote and provide training on environmental topics to raise awareness among employees, encouraging them to incorporate good environmental practices into their daily activities. In addition, promote corporate social responsibility by collaborating with environmental NGOs.

9. Serve as the headquarters of the Executive Committee for Port Environmental Management (CEGAP) in order to provide a platform for engagement with Authorities, the Port Community, and society as a whole for the development of environmental programs and contingency prevention. Likewise, the CEGAP will be an essential tool for recognizing and addressing the needs and expectations of all port stakeholders.

10. In line with the objectives set by the United Nations (SDGs), our ports will strive to comply with those goals within their scope (in particular SDGs 7, 8, 9, 11, 12, 13, 14, and 17).

11. This Port Administration is committed to meeting the needs and expectations of our clients and other interested parties in accordance with the current legal framework.

12. This Policy shall be reviewed regularly or when its scope is expanded.

Approved by ANP Board Resolution No. 421/4.267.

Ing. Civil PABLO GENTA
President
Administración Nacional de Puertos

3. REGISTER OF ENVIRONMENTAL ASPECTS, LEGAL REQUIREMENTS AND PERFORMANCE INDICATORS (Section 1.2 of PERS)

3.1 Environmental Aspects

ANP, through the UGMA, establishes and follows a procedure for the identification of environmental aspects related to the most relevant operations and activities in services provided directly by ANP or through third parties.

3.1.1 Identification of Environmental Aspects

The steps to be followed for each process are:

- To identify relevant environmental aspects taking into account all activities and operations carried out.
- To identify all legal and regulatory requirements related to the environmental aspects of operational processes.

For the identification of different environmental aspects, the following is taken into account:

- ✓ Past, present or potential activities related to the process.
- ✓ Operation under normal, abnormal and emergency conditions.
- ✓ Legal and regulatory requirements identified.
- ✓ Assessment of the existing practices and procedures.
- ✓ Assessment of previous incident data.

The identification of environmental aspects should consider the following aspects:

- ✓ emissions to air
- ✓ dumping to watercourses
- ✓ waste management
- ✓ disposal into the ground
- ✓ impact on biodiversity
- ✓ impact on property
- ✓ use of raw materials and natural resources
- ✓ soil use
- ✓ energy consumption
- ✓ other local and community environmental issues

The UGMA and the person in charge of the process (Construction Manager, head of the corresponding area, etc.) make up a sort of Process Management Team (EGP), which records all environmental aspects identified in the Environmental Aspects Identification and Assessment Form. Any possible impacts associated with the identified aspects are included in said form.

3.1.2 Information Updating

The UGMA keeps the list of identified environmental aspects, legal requirements and related environmental impacts up to date. These aspects are reviewed in each Environmental Management System (SGA) Review carried out by ANP's management.

3.2 Legal and Other Requirements

There is a procedure for the identification of legal requirements related to environmental aspects of services and operations.

The UGMA takes part in the coordination to ensure compliance with such requirements through the Port Environmental Management Executive Committee (CEGAP), which includes representatives from ministries and other government agencies, as well as from the private sector, unions and the civil society. It provides a source of valuable information regarding possible changes and updates to legislation, regulations and guidelines, among others, in order to take early actions to update Environmental Management Protocols.

3.2.1 General Environmental Regulations

The regulations taken into account in the register of legal and regulatory requirements are the ones set forth in:

- International legislation
- Regional legislation (MERCOSUR)
- National legislation
- Departmental and local legislation

A routine periodic review of applicable legal and regulatory requirements is also carried out, prior to management review, when new ANP processes and services are implemented.

General environmental regulations applicable to the activities of the Port of Montevideo:

Article 47 of the Constitution of the Republic of Uruguay
Environmental protection is of general interest. People must refrain from any act that causes serious depredation, destruction or pollution to the environment. The law will regulate this provision and may provide sanctions for violators.

LAWS

Law No. 13.833/69
The aforementioned law prohibits, in its Article 12, the discharge into waters of any substance that in any way makes its use harmful or destroys the flora or fauna.

Law No. 14.885/79 and amendments: Law No. 15.995/88, Law No. 15.738
Adheres to the International Convention to Prevent Pollution from Ships (Marine Pollution Protection Convention, MARPOL). It includes rules to prevent pollution by hydrocarbons, harmful and harmful substances, dirty water and garbage.

Law No. 16.466 Law on Prevention and Environmental Impact Assessment
The Law and regulations stipulate that anyone interested in carrying out a project must submit a request for Prior Environmental Authorization (AAP) to the application authority, in this case the Ministry of the Environment. For the issuance or granting of such AAP, DINACEA may require the Executive Branch to involve the other ministries and departmental governments that have to do with the project in question. Defines the specialties of the liability regime for environmental damage.

Law No. 17.283 General Law on Environmental Protection
Regulates Article 47 of the Constitution and declares “of general interest”:

• protection of the environment, air quality, water, soil and landscape;
• the conservation of biological diversity and the configuration and structure of the coast;
• the reduction and proper management of toxic or dangerous substances and waste of any type;

• the prevention, elimination, mitigation and compensation of negative environmental impacts;
• the protection of shared environmental resources and those located outside areas subject to national jurisdiction;
• regional and international environmental cooperation and participation in the solution of global environmental problems;
• the formulation, implementation and application of the national environmental and sustainable development policy.

Likewise, the protection and management of archaeological sites and entities are recognized in this law.

Law No. 17.852/04 Noise Pollution Law
Establishes permissible sound levels. It attributes to local and departmental authorities the establishment of acoustic zoning, the granting of permits for sound-emitting activities and their control. It assigns the MVOTMA the coordination of the actions of the State and public entities in general.

Law No. 18.610
Law No. 18.610 establishes the guiding principles of the National Water Policy, complying with the second paragraph of article 47 of the Constitution of the Republic. The art. 7 of Law No. 18,610 provides that every person must refrain from causing negative or harmful environmental impacts on water resources, adopting the necessary prevention and precautionary measures.

Law No. 19.101/2013
Approves the 1996 Protocol to the Convention on the Prevention of Marine Pollution by Dumping of Waste and Other Matter (London Convention, 1972).

Law No. 19.204: Approval of the 1997 Protocol to the MARPOL Convention 73/78
This Law adds Annex VI, entitled "Rules to prevent air pollution caused by ships."

Law No. 19.439 Approval of the Paris Agreement on Climate Change
Approves the Paris Agreement in the United Nations Framework Convention on Climate Change.

Law No. 19.829
Law No. 19.829 aims to protect the environment and promote a sustainable development model, in accordance with the provisions of Law No. 17.283, through the prevention and reduction of the negative impacts of the generation, handling and all stages of waste management and the recognition of its possibilities of generating value and quality employment.

DECREES

Decree No. 100/91 and subsequent modifications.
Regulation on the Use of Aquatic, Coastal and Port Spaces.

Decree No. 349/005 regulating Law No. 16.466/1994
It regulates the Environmental Impact Assessment system and determines the type of venture that must have Prior Environmental Authorization. It defines the administrative processes for the environmental licensing of the project and its operation introduces, among other innovations, the figure of the Environmental Operation Authorization for certain types of projects.
The installation of a port terminal requires Prior Environmental Authorization (AAP) from the Ministry of the Environment, as it is included in the scope of article 2, numerals listed below:
"5) Construction of new ports, both commercial and sports, or remodeling of existing ones where there are modifications to sea structures, whether breakwaters, docks, docks or works that involve reclaiming land from the sea.
6) Construction of oil or chemical products transfer terminals.

20) Installation of warehouses for dangerous substances or goods, whether or not they are divided.
29) Dredging of courses or bodies of water for navigation purposes; with the exception of maintenance dredging of navigable waterways.
31) Construction of docks, breakwaters or breakwaters.
33) Any construction or work that is planned in the coastal defense strip, defined by article 153 of the Water Code."

Decree No. 15/019
Decree No. 15/019 dictates regulations on the environmentally appropriate management of lamps and other waste with mercury. In particular, it is established that natural and legal persons, both public and private, who hold items containing mercury, are responsible for their proper handling and treatment, and, where appropriate, for the final disposal of their waste, so that the environment is not affected, according to what is established in this regulation.

Decree No. 153/021
Decree No. 153/021 dictates regulatory standards on air quality. The objective of this regulation is to protect the environment through the prevention of air pollution, by establishing air quality objectives to reduce risks to human health and ecosystems, and by setting maximum emission limits, both for fixed and mobile sources.

RESOLUTIONS

Resolution No. 1389/2017 Guide for the Request for Prior Environmental Authorization
It is a support tool for the preparation of the necessary documents in the presentation of the Request for Prior Environmental Authorization (AAP) of projects of activities, constructions or works, public or private, indicated in article 2 of the Regulation of Environmental Impact Assessment and Environmental Authorizations (EIA/AA Regulation, approved by Decree 349/005 regulating Law No. 16,466), which require it after having been communicated to DINACEA and classified in categories “B” or “C” of article 5 of said Regulation. The Guide is general in nature. The professionals responsible for preparing the documents and those interested in them must consider the particularity of each project and adapt the information to the characteristics of the activities, constructions and works involved.

Resolution No. 491/2023 Instructions for the process of Renewal of the Environmental Operation Authorization (AAO)
Resolution No. 491/2023 establishes the minimum requirements to process the application for Renewal of the Environmental Operation Authorization (AAO), defining the documentation and information that the proponents must present to the National Directorate of Evaluation and Environmental Quality (DINACEA), to evaluate and establish the conditions for the operation of the undertaking.

MARITIME PROVISIONS

Maritime Provision 151 “Management of operational safety and environmental protection in port facilities and/or terminals and off shore constructions”
The aforementioned Maritime Provision puts into effect the operational safety and environmental protection standards through the guidelines set out in the ISM (ISM) code for ships, boats and naval devices that operate or participate in maritime port works. Said vessels must have an approved operational safety and environmental protection management system manual, in accordance with the risks entailed by their participation in maritime or port operations, as well as those linked to Off Shore activities.

Maritime Provision 170 “Amended rules to prevent pollution by garbage from ships sailing in waters under national jurisdiction.”

This standard establishes rules to prevent pollution by garbage from ships that navigate in waters under national jurisdiction.

Maritime Provision 172 "Implementation of the International Maritime Code for Solid Bulk Cargoes (IMSBC) to be added in the category "embarkation and disembarkation of solid bulk cargoes"
This standard requires that ships transporting solid bulk cargoes and solid bulk dangerous goods by sea must comply with the provisions of the International Maritime Code for Solid Bulk Cargoes (IMSBC code). The main objective of the International Maritime Code for Solid Bulk Cargoes is to facilitate safe stowage and dispatch of solid bulk cargoes, as well as their safe transportation.

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Service for removal of bilge water from ships	Liquid waste discharge (bilge water)	Water pollution	Resolution MARPOL 73/78 – Annex I – Law No. 15,955/88	It makes it mandatory to provide services to ships	OILY BILGE WATER DISCHARGE AND FINAL DISPOSAL PROTOCOL
			Soil pollution	Decree No. 182/2013 (CATEGORY I) Regulations on Industrial and similar solid waste management	It regulates waste management	
			Air pollution	Law No. 14,859 as regulated by Decree No. 253/79 – Water Code	It sets limits for liquid effluents dumping	
			Impact on biodiversity	MVOTMA Resolution No. 15/2003 – Prohibition of oil dumping and bilge and ballast pumping	Prohibition of oil dumping and bilge and ballast pumping	
			Impact on property	MVOTMA Resolution No. 73/2003 – It sets acceptable parameters and ranges for oil disposal	It sets acceptable parameters for oil disposal	
				Law No. 16,688/1994 Articles 1 and 2 Environment – Ecology	Ships are prohibited from discharging oil and mixtures thereof in any way that breaches any provisions of the regulations in force	
				Maritime Provision No. 8 – Rules on safeguarding and stewardship of rights and resources of territorial waters, prohibition to dump noxious substances into water	Prohibition of oil dumping and bilge and ballast pumping	
			Visual pollution	Law No. 17,590/2002 – Protocol on Preparedness, Response and Cooperation to Pollution Incidents by Hazardous and Noxious Substances, 2000	Ships shall have an emergency plan in place in case of pollution incidents	
				Maritime Provision No. 143 – Rules on compliance with MARPOL ANNEX I by foreign-flagged ships not at berth	It makes it mandatory to comply with ship waste management set forth in Annex I	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Service for discharge of sewage from ships	Liquid waste discharge (sewage)	Water pollution Soil pollution	Resolution MARPOL 73/78 – Annex IV – Law No. 15.955/88	It makes it mandatory to provide adequate services for ship waste disposal	SEWAGE DISCHARGE PROTOCOL
			Air pollution Visual pollution	Law No. 14.859 as regulated by Decree No. 253/79 – Water Code	It sets limits for liquid effluents dumping to the sewer	
			Impact on public health	Decree No. 518/003 Resolution No. 34/ MERCOSUR- Criteria for the sanitary management of liquid waste and wastewater at ports, airports, terminals and border points within MERCOSUR	It sets responsibilities for sanitary waste	
			Impact on biodiversity Impact on property	Decree No. 497/1988 Prohibition of discharges in certain places by any kind of public or private vacuum trucks	Prohibition of uncontrolled vacuum trucks discharge	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Service for removal of solid waste from ships	Discharge of solid waste from ships	Water pollution	Resolution MARPOL 73/78 – Annex V – Law No. 15,955 of June 20, 1988	It makes it mandatory to provide adequate services for ship waste disposal	SOLID WASTE FROM SHIPS MANAGEMENT PROTOCOL
			Soil pollution	Maritime Provision No. 170 Regulations for the prevention of pollution by dumping of garbage from ships navigating in waters under national jurisdiction	It sets regulations for the prevention of pollution by garbage according to MARPOL, Treaty of Río de la Plata and UNCLOS	
			Air pollution	Decree No. 182/2013 Industrial and similar solid waste management Ministerial Resolution No. 1238/2021	It regulates waste management	
			Impact on biodiversity	Law No. 16.221 Ratification of the Basel Convention	Prohibition of transboundary movements of hazardous waste	
			Impact on property	Law No. 17.220/1999 Prohibition of entry of hazardous waste of any kind	Prohibition of hazardous waste entry	
			Impact on public health	MERCOSUR/GMC/Resolution No. 30/02 regulated in Decree No. 541/2007	It sets criteria for sanitary management of solid waste at MERCOSUR ports	
				Resolution of the Municipality of Montevideo Decree No. 1696/2007 on Waste Transport	Regulations for waste transport authorization	
			Visual pollution	Maritime Provision No. 143 Rules on compliance with MARPOL Annexes I and V by foreign-flagged ships not at berth	It sets criteria for waste from ships that are not at berth	
				Ministerial Resolution No. 1238 Standards for managing organic waste from foreign-flagged vessels.	Provides conditions for final disposal of organic waste	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Drinking water supply service for ships	Drinking water consumption	Use of natural resource	Article No. 47 of the Constitution of the Republic of Uruguay regarding drinking water and sewage regulation	N/A	WATER CONSUMPTION MEASUREMENT
	Electrical power supply service for ships and port facilities	Electrical power consumption	Use of natural resource	N/A	N/A	SUPPLY BY NETWORK UNIT AND ELECTRICAL POWER CONSUMPTION MEASUREMENT
	Bunkering service	Oil spills	Soil pollution	Maritime Provision No. 8 Prohibition of oil dumping, bilge and ballast pumping	Prohibition of oily dumping	REGULAR INSPECTIONS AT THE DOCKS UPON COMPLETION OF OPERATIONS
			Air pollution	Maritime Provision No. 157 Complementary regulations on the prevention of pollution of the marine environment	Foreign-flagged ships shall have an OSRO	
		Noise generation	Water pollution	Resolution No. 94/2015 of the National Naval Prefecture (PRENA)	Ships flying the national flag shall have an OSRO	
		GHG emissions	Impact on public health (noise)	Law No. 17.590/2002 Protocol on Preparedness, Response and Cooperation to Pollution Incidents by Hazardous and Noxious Substances, 2000	Ships shall have an emergency plan in place in case of pollution incidents	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Containerized cargo loading and unloading	Electrical power consumption (reefer and cranes)	Use of natural resource	Decree No. 183/1994 Articles 95 and 100 Regulations on Port Operations and Harbor Masters	Spill area cleaning	REGULAR INSPECTIONS AND SPILL CONTAINMENT FOR DISPOSAL AND TREATMENT
			Water pollution	MARPOL 73/78- Annex VI "Regulations for the Prevention of Air Pollution from Ships", ratified by Law No. 19,204	Regulations for the prevention of pollution	
		Container stowage (GHG emissions from power generators)	Soil pollution			
			Air pollution	Law No. 14.859 as regulated by Decree No. 253/79 – Water Code	Treatment and final disposal according to the spilled substance type	
		Containerized cargo leak or spillage	Visual pollution			
			Soil use			
	General cargo loading and unloading (vehicles, fishing, machinery, etc.).	Solid waste generation (pallets, boxes, etc.)	Soil pollution	Decree No. 183/1994 Articles 95 and 100 Regulations on Port Operations and Harbor Masters	Dock and warehouse cleaning	REGULAR INSPECTIONS AT THE DOCKS AND WAREHOUSES UPON COMPLETION OF OPERATIONS
			Water pollution			
		Handled cargo leak or spillage	Air pollution			
			Visual pollution			
		Stowage on the floor	Soil use			

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Loading and unloading of live animals	GHG emissions (methane) and odors generation	Water pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	REGULAR INSPECTIONS AT THE DOCKS UPON COMPLETION OF OPERATIONS
		Solid waste generation	Soil pollution			
		Liquid effluent generation	Air pollution	Decree No. 183/1994 Articles 95 and 100 Regulations on Port Operations and Harbor Masters	Dock cleaning	
		Particulate matter generation	Impact on biodiversity Impact on property			
	Dock cleaning	Waste removal from docks	Water pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	REGULAR INSPECTIONS, IMMEDIATE CORRECTIVE ACTIONS
			Visual pollution Soil pollution	Decree No. 183/1994 Articles 95 and 100 Regulations on Port Operations and Harbor Masters	Dock cleaning	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Ballast water management	Ballast water discharge	Water pollution Impact on biodiversity (invasive species) Impact on property Impact on public health (pathogens)	Maritime Provision No. 109 – Guidelines for the control and management of ships' ballast water	It sets guidelines for control and management of ships' ballast water	CONSENSUAL FORM FOR BALLAST WATER DISPOSAL UNDER SPECIAL NAVIGATION CONDITIONS
				Maritime Provision No. 109 Annex Alfa – Instructions and procedures	Ship deballasting procedure under exceptional conditions due to navigational risks	
				Maritime Provision No. 109 Annex Beta – Ballast water notification	Ballast Water Notification Form	
				Maritime Provision No. 8 Deballasting	It prohibits dumping to water or soil	
	Maintenance workshops	Solid waste generation	Soil pollution Water pollution Air pollution Depletion of natural resource Impact on property	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	WASTE REMOVAL, TREATMENT AND FINAL DISPOSAL
		Liquid waste generation		Decree No. 358/015 Regulations on management of tires and tubes that are no longer used	It regulates used tires management	
		Electrical power consumption				
		Drinking water consumption				
		Spills of chemical products (oils, solvents, etc.)		Decree No. 373/003 Regulations on handling and disposal of lead-acid batteries that are used or to be disposed	It regulates used batteries management	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Movement of passengers and private vehicles	Electrical power consumption	Use of natural resource Air pollution Soil pollution Water pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	WASTE REMOVAL
		Greenhouse gas emissions				
		Drinking water consumption				
		Solid waste generation				
		Sewage generation				
	Dry bulk loading and unloading	Particulate matter generation during operation, on machinery and docks	Soil pollution Water pollution Air pollution (emission/immission PM10) Impact on biodiversity Impact on property Impact on public health Use of natural resource Visual pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	REGULAR INSPECTIONS AT THE DOCKS UPON COMPLETION OF OPERATIONS
		Solid waste generation		Decree No. 183/1994 Articles 95 and 100 Regulations on Port Operations and Harbor Masters	Dock cleaning	
		Electrical power consumption (conveyor belt or cranes)				

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Administrative activities	Electrical power consumption Drinking water consumption	Use of natural resource Soil pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates port waste management	WASTE REMOVAL, TREATMENT AND FINAL DISPOSAL
		Solid waste generation (paper, WEEE, etc.)	Water pollution			PROJECT FOR RECYCLING USED OFFICE PAPER (INTO MATERIALS FOR PUBLIC SCHOOLS)
		Sewage generation				
	Firefighting services	Electrical power consumption	Use of natural resource	Maritime Provision No. 141	It makes it compulsory to have a service contract with a company that works to prevent pollution, Oil Spill Response Operator (OSRO)	TREATMENT AND FINAL DISPOSAL FIREFIGHTING AND OIL SPILLS
		Consumption of drinking water and water from the bay	Soil pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	WASTE REMOVAL
		Solid waste generation	Water pollution			

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Operations of ships, cranes, port equipment, trucks and vehicles of all sizes	GHG emissions Particulate matter generation	Soil pollution Water pollution	Resolution MARPOL 73/78- Annex VI "Regulations for the Prevention of Air Pollution from Ships" Ratified by Law No. 19,204	It sets measures related to air pollution from ships	MONITORING AND STUDIES FOR THE REDUCTION THEREOF
		Noise generation Fuel spills	Air pollution Impact on property	Law No. 17.590/2002 Protocol on Preparedness, Response and Cooperation to Pollution Incidents by Hazardous and Noxious Substances, 2000	It requires ships to have an emergency plan in place in case of pollution incidents	
		Vibration generation Fuel consumption	Impact on public health Use of natural resource	Law No. 17.852/04 Noise pollution	It aims at preventing, monitoring and correcting noise pollution	SOLID WASTE MANAGEMENT

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Hazardous cargo handling within the Port of Montevideo	Hazardous cargo handling management	Water pollution	Resolution MARPOL 73/78 – Annex III – Law No. 15.955/88 and IMDG Code from IMO version 2016	Compliance with IMDG Code	DOCUMENT CONTROL RECORDS (Decrees on hazardous cargo) REGULAR INSPECTIONS, IMMEDIATE CORRECTIVE ACTIONS
			Soil pollution	Maritime Provision No. 146 Training of ground staff that handles and transports hazardous cargo	Ground staff training	
			Air pollution	Law No. 17.283 Article 1, C and Article 21	The reduction and proper handling of toxic or hazardous substances and waste of any kind and the protection of the environment against any impact arising from handling or disposal of waste of any kind are matters of general interest.	
			Impact on biodiversity	Law No. 16.221 Ratification of the Basel Convention	Prohibition of transboundary movements of hazardous waste	
				Law No. 17.220/1999 Prohibition of entry of hazardous waste (Articles 1, 2 and 3).	Prohibition of hazardous waste entry	
			Impact on property	Decree No. 346/2011 Labeling of Chemicals. Globally Harmonized System (GHS)	Compliance with GHS Code	
				Decree No. 158/85 Regulations on operations and transport involving hazardous goods	Storage, segregation and training regulations (PNN)	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Operations and Services Area	Hazardous cargo handling within the Port of Montevideo	Hazardous Cargo Handling Management	Impact on public health	Decree No. 183/1994 Regulations on port operations and harbor masters - Port Services	Storage, segregation and training regulations (ANP)	
				Law No. 19.056 Radiological safety and protection of people, property and the environment	Prohibition of radioactive substance discharge at the port	
			Visual pollution	Law No. 17.590/2002 Protocol on Preparedness, Response and Cooperation to Pollution Incidents by Hazardous and Noxious Substances, 2000	Vessels shall have an emergency plan in place in case of pollution incidents	
	Control of foreign-flagged vessels illegal fishing when entering national ports	Impact on fishery resources and ichthyofauna	Impact on biodiversity	Law No. 19.017/2012 Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing Decree No. 323/2017 – Regulation of Law No. 19,017/2012	DINARA is suggested to keep a record of violating ships, take police actions in coordination with the National Naval Prefecture through Port State Control and report to ANP whether or not they are authorized to use the port	ANP has access to the single window system at the website of DINARA with a user and password in order to check whether the fishing vessel is authorized or not to legally operate
		Accidents and incidents	Soil pollution	Decree No. 289/2010 Foreign-flagged fishing vessels. Conditions for entry to national ports	Insurance coverage for accidents/incidents, removal of wrecks and abandonment costs is required (P&I Clubs or certified insurance companies)	Submission of the insurance policies covering the mentioned risks
		Removal of wrecks	Water pollution			
		Abandonment costs	Air pollution			

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Emergency	Health care 24 hours a day, 365 days a year at the Port of Montevideo	Hospital waste generation	Impact on people's health within the Port of Montevideo area	Decree No. 586/009 Regulations on sanitary waste	It regulates hospital waste management (only for the medical service of the Port of Montevideo)	RESPONSIBLE HANDLING OF HOSPITAL WASTE FOR ITS REMOVAL, TREATMENT AND FINAL DISPOSAL
		Accidents within the port area		Decree No. 506/009 Hospital waste management	It defines waste and responsibilities for hospital waste management (only for the medical service of the Port of Montevideo)	

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Fleet and Dredging Area	Cleaning of body of water at commercial docks	Solid waste generation	Water pollution	Decree No. 182/2013 Industrial and similar solid waste management	It regulates waste management	PROTOCOL ON "NELSON ALTIER" BOAT WASTE REMOVAL FROM THE WATER SURFACE AT COMMERCIAL DOCKS
		Fuel Consumption	Use of natural resource			
	Service for initial and maintenance dredging of channels and access	Disposal of dredged material	Soil pollution (benthos or seabed)	Decree No. 349/005 Article 2, subparagraph 26 Regulations on Environmental Impact Assessment and Environmental Authorizations	Regulations on environmental impact studies required for initial dredging	ENVIRONMENTAL IMPACT ASSESSMENT AND PRIOR ENVIRONMENTAL AUTHORIZATION BY NATIONAL ENVIRONMENTAL AUTHORITY
		Generation of waste similar to urban waste	Water pollution			
		Liquid effluent generation	Air pollution			COMMUNICATION OF FINDINGS RELATED TO SINKINGS TO THE HERITAGE COMMISSION, IDENTIFICATION AND PRESERVATION (ANCHORS, CANNONS, ETC.)
		Generation of solid waste similar to industrial waste	Use of natural resource			
		Fuel Consumption	Impact on public health	Law No. 14.040 National Historical, Artistic and Cultural Heritage	To ensure the preservation of the heritage and property found	
		Emissions to air	Impact on biodiversity			STUDIES ON SINKINGS WITH HISTORICAL VALUE
		Sediment extraction	Impact on archaeological cultural heritage			

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Infrastructure Area	Infrastructure Construction Works	Relevant environmental aspects in the influence area of the port infrastructure of the projects	Soil pollution	Decree No. 349/005 REGULATIONS ON ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL AUTHORIZATIONS	Regulations on environmental impact studies required for infrastructure works	EXECUTIVE PROJECT ACCORDING TO RECOMMENDATIONS FOR MARITIME WORKS ENVIRONMENTAL MANUAL ON CONSTRUCTION WORKS FOR THE PORT SECTOR ASSESSMENT OF THE ENVIRONMENTAL IMPACT AND ENVIRONMENTAL VIABILITY OF THE LOCATION, PRIOR ENVIRONMENTAL AUTHORIZATION APPLICATION AND CLASSIFICATION
		Land reclamation filling	Water pollution			
		Generation of waste similar to urban waste	Air pollution			
		Generation of construction work waste (temporary facilities)				
		Liquid effluent generation (works and temporary facility)	Use of natural resource			
		Particulate matter emission to air				
		Noise and vibration generation	Impact on public health			
		Electrical power consumption				
		Fuel consumption				
		Gas emissions				
		Drinking water consumption				
		Consumption of natural resources (use of quarries, sandbank of Río de la Plata, etc.)	Impact on biodiversity			
		Traffic generated by trucks and machinery	Impact on hydrodynamics			
		*Other aspects depending on the Executive Project				

AREA	ACTIVITY	ENVIRONMENTAL ASPECT	ENVIRONMENTAL IMPACT	APPLICABLE LEGISLATION	LEGAL REQUIREMENTS	CONTROL MEASURES
Fleet and Dredging Area	Abandoned ships	Solid waste generation	Water pollution Visual pollution Air pollution	Mailshot Dirme No. 02/2015 Decree No. 182/2013 Industrial and similar solid waste management	Submit a Plan for Scrapping Ships and Naval Artifacts It regulates waste management	MANAGEMENT OF ABANDONED SUNKEN OR HALF-SUNKEN SHIPS
		Changes in the landscape due to physical presence	Soil pollution Impact on biodiversity			

The legal inventory was carried out by an external law firm. It is attached to this document as Annex.

3.2.2 Environmental Aspects Assessment

The UGMA defines which aspects are significant taking into account the following criteria: Importance (as a result of the algorithm based on the criteria), frequency or likelihood of occurrence, severity, compliance with legislation (existing relevant legislation and level of compliance) and impact on the public image of the Port of Montevideo. A matrix with the process activities and environmental aspects is created, where each is classified by: Frequency, Severity, Compliance with Legislation, Public Image.

The rating scale for each of them is shown in the following chart:

ITEM	CLASSIFICATION	
Frequency (F)	1- Very Low	More than 2 years
	2- Low	Once every 2 years
	3- Medium	Once every year
	4- High	Twice a year
	5- Very High	Three times a year
Severity (S)	1- No Risk	
	2- Potential Risk	
	3- Minimum Risk	
	4- Moderate Risk	
	5- High Risk	
Compliance with legislation (L)	1- There is no applicable legislation	
	2- It fully complies with the applicable legislation	
	3- It partly complies with the applicable legislation	
	4- It partly complies with some legislation	
	5- It does not comply with legislation	
Negative public image (IP)	0- Neutral public image	
	1- Public image of low importance	
	2- Public image of medium importance	
	3- Public image of high importance	
Importance of the Aspect (Λ)	It is determined by the following formula: Λ= [(F x S x L) + IP]	

Ratings over 40 points are considered “significant values” and that classification is given to the significant environmental aspect.

The importance is related to the organization and its context. An aspect outside the classification of said algorithm could be regarded as significant. ANP’s Board of Directors together with the Environmental Manager may classify an environmental aspect with greater significance and determine that such aspect shall be considered a significant aspect based on a Strategic Environmental Assessment that takes policies, programs and projects for the development of the country into account.

ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
(*) Infrastructure construction works	Executive Project, Environmental Impact Assessment	5	5	2	3	53	1
Bilge water from ships removal service	Liquid waste discharge (bilge water)	5	5	2	2	52	2
Service for initial and maintenance dredging of channels and access	Disposal of dredged material	5	4	2	3	43	3
Solid waste from ships removal service	Discharge of solid waste from ships	5	4	2	3	43	4
Service for initial and maintenance dredging of channels and access	Sediment extraction	5	4	2	3	43	5
Hazardous cargo handling within the port area	Hazardous cargo handling management	4	5	2	3	43	6
Sewage from ships discharge service	Liquid waste discharge (sewage)	5	4	2	3	43	7
Dock cleaning service	Waste removal from docks	5	4	2	2	42	8
Ballast water management	Ballast water discharge	5	4	2	1	41	9
Cleaning of body of water at commercial docks	Solid waste generation	4	3	3	5	41	10
Administrative activities	Solid waste generation (paper, WEEE, etc.)	5	3	2	3	33	11

ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	GHG emissions	5	3	2	2	32	12
Loading and unloading of live animals	Liquid effluent generation	5	2	3	1	31	13
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	Particulate matter generation	5	3	2	1	31	14
Movement of passengers and private vehicles	Solid waste generation	5	3	2	1	31	15
Administrative activities	Sewage generation	5	3	2	1	31	16
Service for initial and maintenance dredging of channels and access	Generation of solid waste similar to industrial waste	5	3	2	1	31	17
Abandoned ships	Solid waste generation	4	3	2	3	27	18
Health emergencies service	Hospital waste generation	4	3	2	1	25	19
Maintenance workshops	Spills of chemical products (oils, solvents, etc.)	3	4	2	1	25	20
Abandoned ships	Changes in the landscape due to physical presence	5	2	2	3	23	21
Control of foreign-flagged vessels illegal fishing when entering national ports	Accidents and Incidents	5	2	2	3	23	22

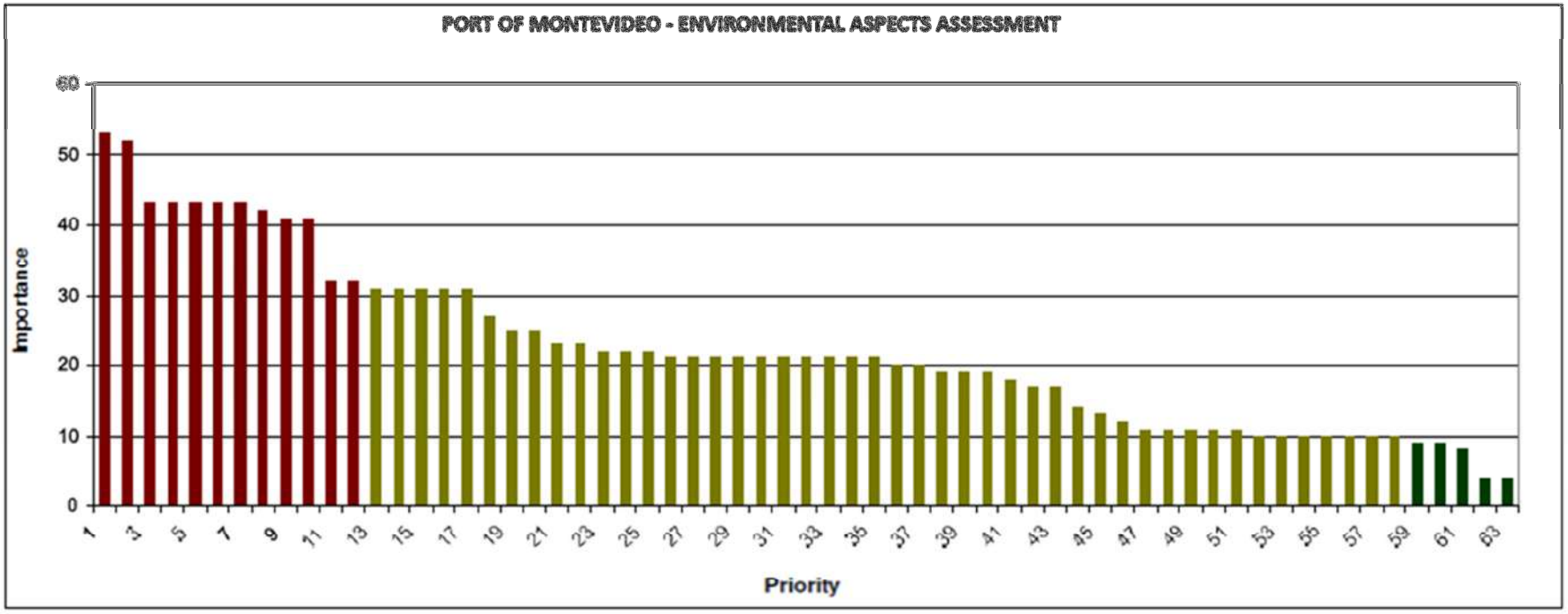
ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
Control of foreign-flagged vessels illegal fishing detained when entering the Port of Montevideo	Impact on fishery resources and ichthyofauna	5	2	2	3	23	23
Loading and unloading of live animals	Particulate matter generation	5	2	2	2	22	24
Dry bulk loading and unloading	Particulate matter generation during operation	5	2	2	2	22	25
Dry bulk loading and unloading	Solid waste generation	5	2	2	2	22	26
Loading and unloading of live animals	Solid waste generation	5	2	2	1	21	27
Containerized cargo loading and unloading	Container stowage	5	2	2	1	21	28
General cargo loading and unloading (vehicles, fishing, machinery, etc.)	Solid waste generation (pallets, boxes, etc.)	5	2	2	1	21	29
General cargo loading and unloading (vehicles, fishing, machinery, etc.)	Stowage on the floor	5	2	2	1	21	30
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	Noise generation	5	2	2	1	21	31
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	Vibration generation	5	2	2	1	21	32

ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
Movement of passengers and private vehicles	Sewage generation	5	2	2	1	21	33
Service for initial and maintenance dredging of channels and access	Generation of waste similar to urban waste	5	2	2	1	21	34
Service for initial and maintenance dredging of channels and access	Liquid effluent generation	5	2	2	1	21	35
Service for initial and maintenance dredging of channels and access	Emissions to air	5	2	2	1	21	36
Emergency service in case of fire	Drinking water consumption	5	2	2	0	20	37
Emergency service in case of fire	Solid waste generation	5	2	2	0	20	38
Control of foreign-flagged vessels illegal fishing detained when entering the Port of Montevideo	Accidents and incidents	4	2	2	3	19	39
Control of foreign-flagged vessels illegal fishing detained when entering the Port of Montevideo	Removal of wrecks	4	2	2	3	19	40
Control of foreign-flagged vessels illegal fishing detained when entering the Port of Montevideo	Abandonment costs	4	2	2	3	19	41

ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	Fuel spills	2	4	2	2	18	42
Containerized cargo loading and unloading	Electrical power consumption (Reefer)	4	2	2	1	17	43
Containerized cargo loading and unloading	Containerized cargo leak or spillage	2	4	2	1	17	44
General cargo loading and unloading (vehicles, fishing, machinery, etc.)	Handled cargo leak or spillage	2	3	2	2	14	45
Loading and unloading of live animals	GHG emissions (methane) and odors generation	5	1	2	3	13	46
Bunkering service	Oil spills	1	5	2	2	12	47
Drinking water supply service for ships	Drinking water consumption	5	1	2	1	11	48
Electrical power supply service for vessels and port facilities	Electrical power consumption	5	1	2	1	11	49
Movement of passengers and private vehicles	Electrical power consumption	5	1	2	1	11	50
Administrative activities	Electrical power consumption	5	1	2	1	11	51
Administrative activities	Drinking water consumption	5	1	2	1	11	52

ACTIVITIES	ENVIRONMENTAL ASPECT	FREQUENCY (F)	SEVERITY (S)	COMPLIANCE WITH LEGISLATION (L)	PUBLIC IMAGE (IP)	IMPORTANCE OF THE ASPECT (Λ)	PRIORITY
Dry bulk loading and unloading	Electrical power consumption (conveyor belt)	5	1	2	0	10	53
Maintenance workshops	Electrical power consumption	5	1	2	0	10	54
Operations of vessels, cranes, port equipment, trucks and vehicles of all sizes	Fuel consumption	5	1	2	0	10	55
Movement of passengers and private vehicles	Drinking water consumption	5	1	2	0	10	56
Emergency service in case of fire	Electrical power consumption	5	1	2	0	10	57
Cleaning of body of water at commercial docks	Fuel Consumption	5	1	2	0	10	58
Service for initial and maintenance dredging of channels and access	Fuel Consumption	5	1	2	0	10	59
Bunkering service	Noise generation	4	1	2	1	9	60
Bunkering service	GHG emissions	4	1	2	1	9	61
Maintenance workshops	Drinking water consumption	4	1	2	0	8	62
Maintenance workshops	Solid waste generation	1	2	2	0	4	63
Maintenance workshops	Liquid waste generation	1	2	2	0	4	64

(*) Port Development Infrastructure Works require Environmental Impact Assessments where all significant aspects and the way of eliminating or mitigating said aspects are analyzed for each work. For ANP, all infrastructure works have high importance in terms of compliance with the national legislation and the sustainable development of said works.


PORT OF MONTEVIDEO - ENVIRONMENTAL ASPECTS ASSESSMENT
Importance
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Priority

3.3 Environmental Performance Indicators (IDAs)

Environmental Performance Indicators are a management tool to improve environmental quality through actions on environmental aspects and, more specifically, to achieve the environmental goals set out.
They also provide useful information for decision-making and to assess the effectiveness of the actions taken. Environmental Performance Indicators are classified as follows:

Indicators	Scope of measurement and applicability
Management Performance Indicators (IDGs)	They provide information regarding management efforts to impact environmental performance of the port administration.
Operational Performance Indicators (IDOs)	They provide information regarding environmental performance of port operations.
Environmental Condition Indicators (ICAs)	They provide information regarding the environmental condition that might be affected by the port.

The UGMA defines Environmental Key Performance Indicators (ekPis) based on the following criteria: Importance, Equivalence, Verifiability, Clarity and Completeness, selecting the most suitable indicators for the environmental assessment of the services provided by ANP at the Port of Montevideo.

The order of the analytical process is as follows: identification, assessment, and adoption of the corresponding management and technological measures to improve performance based on the indicators that present the greatest weaknesses. For those that exhibit the highest performance, it is assessed whether improvement actions should be taken based on the sustainable development criterion, balancing the environmental, economic and social components.

The methodology applied is as follows:

- The process and service to be measured are analyzed.
- The most suitable indicator type and the value in which it will be expressed are chosen.
- This indicator is used for assessing and monitoring the environmental improvements of the process, notwithstanding other statistical and parametric data considered to be relevant, mainly regarding compliance with legal requirements.

The indicators defined to measure each process are expressed as follows:

MANAGEMENT INDICATORS (IDGs)	
Environmental training	• No. of environmental trainings offered
Hazardous cargo	• No. of inspections / Containers* • Nonconformities / Inspections * Containers with hazardous cargo
OPERATIONAL INDICATORS (IDOs)	
Hazardous cargo	• Incidents
Discharge of sewage from ships. MARPOL IV	• m^3 or tonnes
Discharge of solid waste from ships. MARPOL V	• m^3 or tonnes
Bilge water discharge. MARPOL I	• m^3 or tonnes
Maintenance dredging	• m^3 of maintenance dredging
Initial dredging	• m^3 of initial dredging • m^3 of beneficial use of dredged material / total m^3 of initial dredging
Electrical power	kW/h
Used office paper	Kg of paper collected for recycling Number of supplies delivered to public schools
ENVIRONMENTAL INDICATORS (ICAs)	
Physical and chemical quality of water at commercial docks	• Temperature °C • Conductivity $mS.cm^{-1}$ • Salinity ppt • Turbidity $g.L^{-1}$ - NTU • Dissolved oxygen $mg.L^{-1}$ • pH $[H^+]$

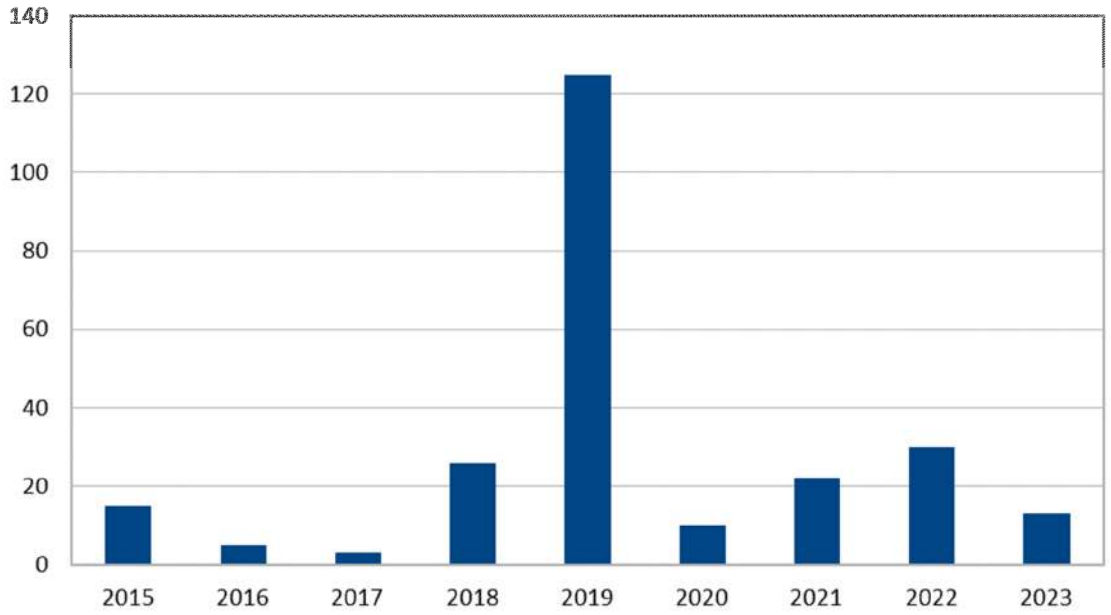
(**) Annual indicators.

3.3.1 Staff Training

The Port of Montevideo provides orientation courses when hiring new employees and staff training regarding relevant environmental aspects in line with the Environmental Policy.

It also maintains the necessary communication channels to disseminate key environmental issues and the way to cooperate for their mitigation. Trainings related to the environmental aspects of the organization include courses regarding hazardous cargo (IMDG Code of IMO - Maritime Provision No. 146), port orientation with an emphasis on port environmental management and training on environmental management systems given by the Instituto Uruguayo de Normas Técnicas (Uruguayan Institute of Technical Standards, UNIT).

Year	Employees with environmental training
2015	15
2016	5
2017	3
2018	26
2019	125
2020	10
2021	22
2022	30
2023	13



It should be noted that the training provided in 2021 and 2022 was solely for Port Induction, while in 2023, the training of 13 employees corresponded to 7 employees trained through Port Induction, one employee trained in Environmental Quality and Sustainable Development, one employee trained in Noise Control and 4 employees trained through a Workshop on the safe handling of Hazardous Chemical Substances.

3.3.2 Hazardous Cargo (IMDG Code - IMO)

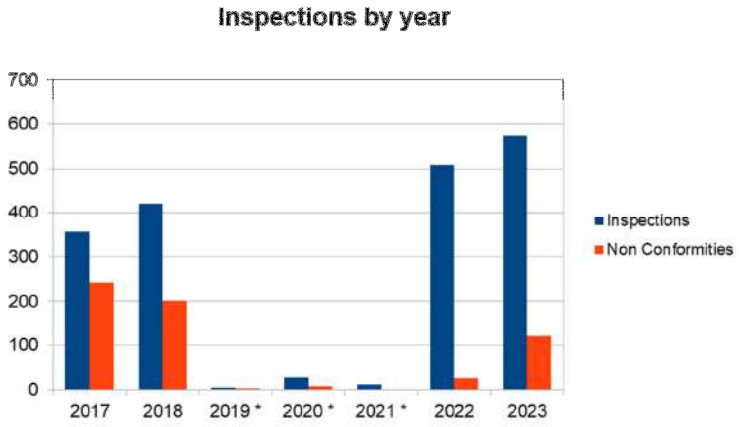
Hazardous cargo is controlled once it is unloaded and stowed in container terminals or warehouses within the port. These controls involve an adequate cargo segregation and identification. Controls according to Decree No. 183/994, under the authority of the Harbor Master of the Port of Montevideo, are also carried out. Said regulation sets forth the conditions for the storage, stowage and segregation of hazardous cargo both at terminals and in warehouses within the port.

In 2021, the UGMA created, an continues to update, a Practical guide for port safety and hazardous cargo (IMDG-IMO) at the Port of Montevideo, the latest version of this document is available at the institutional website.
https://www.anp.com.uy/sites/default/files/archivos/parrafo-colapsable/2021-01/Manual%20de%20Seguridad%20Portuaria%20y%20Cargas%20Peligrosas%20%28Versi%C3%B3n%20Noviembre%202020%29.pdf

The aim of these controls is to prevent risks with this kind of cargo and those that are directly dispatched (Mandatory Direct Dispatch -DDO) undergo a stricter preventive function due to the close relationship between the port and the city that surrounds it. Also, inspections are carried out in container storage areas to terminals and cargo deconsolidated and stored in warehouses to control stowage segregation, labeling, packaging conditions and possible spills or leaks.

Year	Inspections	Non Conformities
2016	460	130
2017	356	243
2018	420	202
2019 *	5	2
2020 *	28	9
2021 *	12	0
2022	507	26
2023	573	120

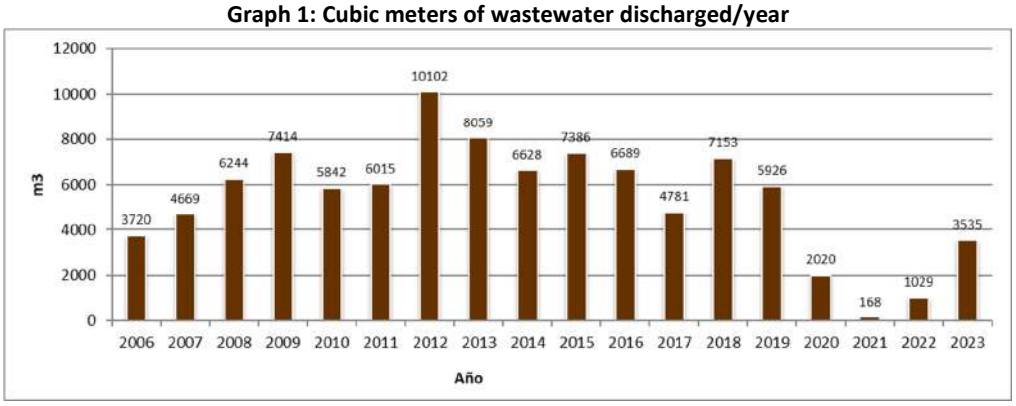
*** Note:** The period between 2019 and 2021 was affected by the global COVID-19 pandemic.



3.3.3 Discharge of Sewage from Ships (MARPOL IV)

In line with the Environmental Policy and in compliance with the international agreements approved by our Parliament, in this case the Convention for the Prevention of Pollution from Ships (MARPOL 73/74), sewage is being discharged according to MARPOL IV since 2002, when a testing period began and changes were made so that ships finally had direct connection to the sewage network of the city of Montevideo.

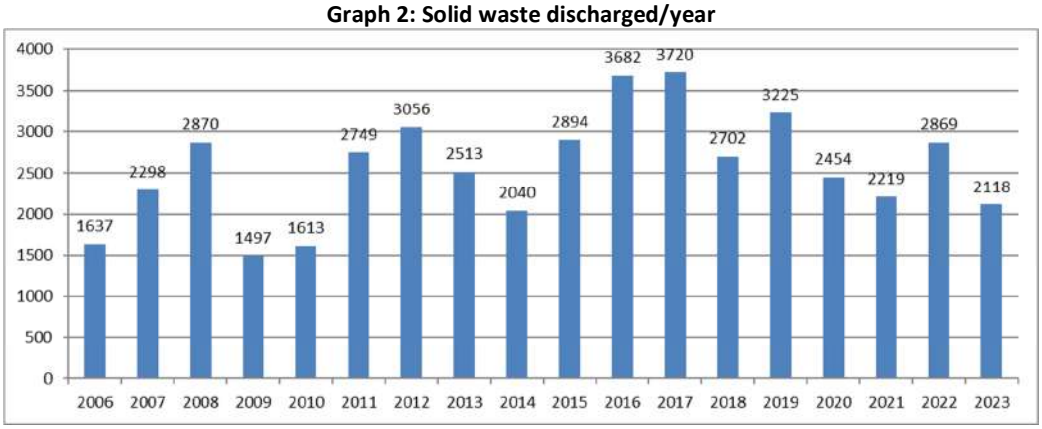
Graph 1: Cubic meters of wastewater discharged/year



3.3.4 Discharge of Solid Waste from Ships (MARPOL V)

The indicators for solid waste discharge from ships referred to in this section are based exclusively on waste originating overseas, meaning that its provisioning takes place in other countries and therefore may pose a health risk, particularly those with an organic composition. Until September 2021, the latter was managed following the procedure described below: prior to shipment, organic waste was placed in dumpsters and covered with layers of lime (calcium carbonate) and then diverted to the landfill. However, as of September 2021, a new Resolution of the Ministry of the Environment (No. 1238/2021) came into force, establishing the mandatory management of the final disposal of organic waste of foreign origin through incineration or autoclave methods, in order to eliminate potential biological risks. Solid waste from nationally flagged vessels provisioned in the country (Uruguay) is considered and treated as household solid waste because its risk is known.

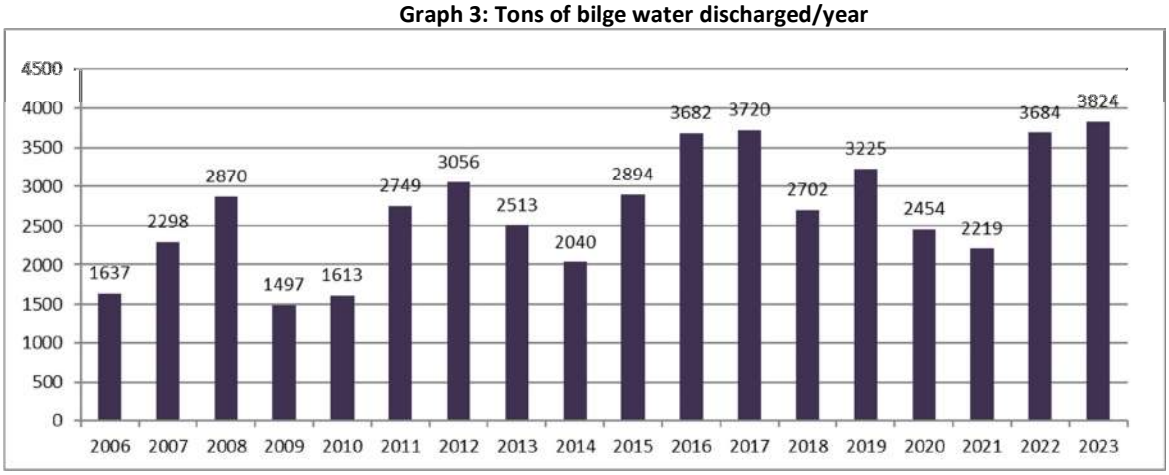
Graph 2: Solid waste discharged/year



3.3.5 Discharge of Bilge Water from Ships (MARPOL I)

The Port of Montevideo also receives bilge water from ships, which is discharged into tanker trucks and transported to a treatment plant to separate the oil phase from the water (FOAS). The latter is treated in treatment lagoons until it reaches the levels required by the Water Code (Decree No. 257/79) for disposal thereof into watercourses, while the oil phase is sent to Portland cement plants to be used as secondary fuel. Other operators separate the oil phase of the bilge water by centrifugation and heating until they reach the values required by the regulations in force.

Graph 3: Tons of bilge water discharged/year



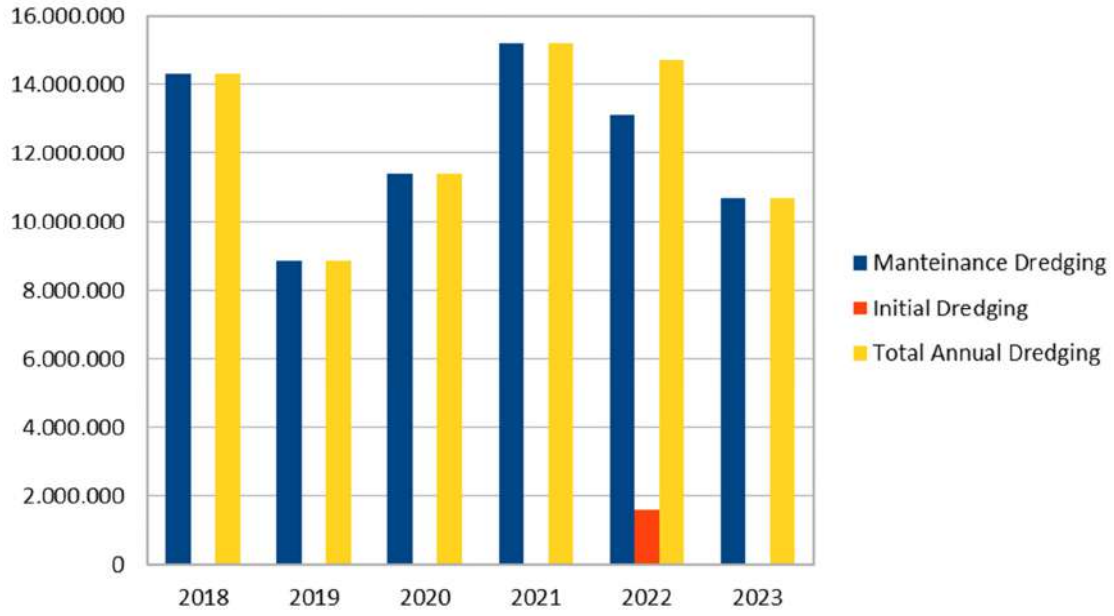
3.3.6 Dredging

One of the main duties of the National Ports Administration is to regularly dredge the basins and channels, which is carried out through the Fleet and Dredging Department. This is considered maintenance dredging and there are specific sites for disposal. Initial dredging for port infrastructure construction works requires an environmental authorization by the DINACEA and the dredged material disposal is conducted as per international standards after its classification.
During 2021, and in the context of the institutional project named "Puerto de Capurro" ("Capurro Port"), the ANP implemented a new way of beneficially managing dredging material, where the material extracted from the area during the deepening works was disposed in geotextiles, generating flocculated sludge to be used in fillers and foundations of the works.

Dredging type/year	2018	2019	2020	2021	2022	2023
Manteinance Dredging	14.319.578	8.884.480	11.390.590	15.224.055	13.135.275	10.713.708
Initial Dredging	0	0	0	0	1.605.000	0
Total Annual Dredging	14.319.578	8.884.480	11.390.590	15.224.055	14.740.275	10.713.708

*Volumes correspond to transported m^3

Graph 4: Cubic meters of dredged material/year



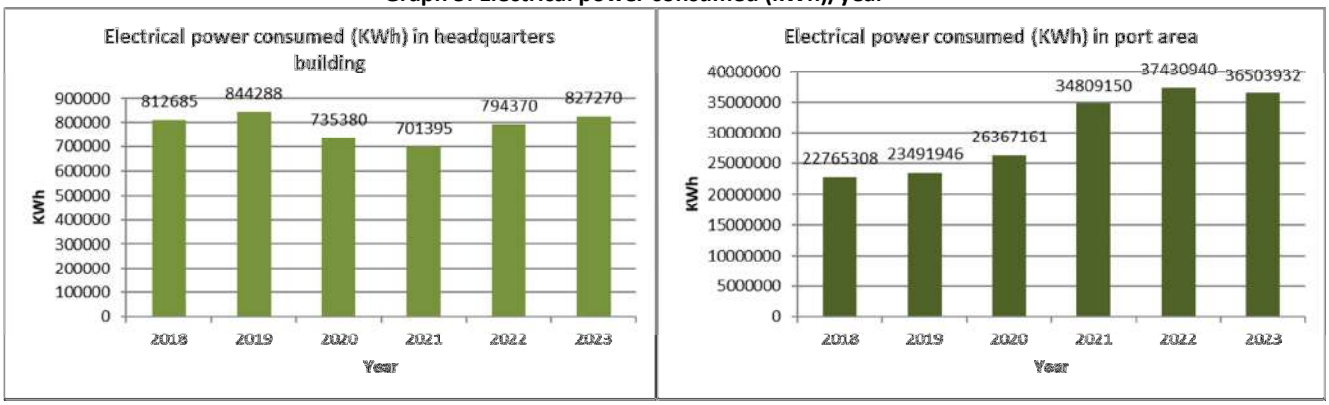
3.3.7 Electrical Power Consumption

ANP, through the Networks Unit of the Infrastructure Area, has a network of substations available to supply electrical power taken from the national network and distributed to the port area with different voltages, amperages and powers, depending on the requirements.

It also records the consumption of several areas granted under concession agreements and other relevant State facilities within the port operational area to which energy is supplied.

Electrical power consumed (kWh)						
Year	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**
Headquarters building	812685	844288	735380	701395	794370	827270
Port area	22765308	23491946	26367161	34809150	37430940	36503932

Graph 5: Electrical power consumed (kWh)/year



It is also important to highlight that there have been changes to the energy grid, introducing the use of more environmentally friendly energy sources. Some examples of these improvements include:
I. Replacement of split air conditioning units at the Port of Montevideo's River and Maritime Terminal with more energy-efficient VRV systems incorporating environmentally friendly refrigerants - 2021.
II. Replacement of 400 high-pressure sodium lights with LED technology at the Port of Montevideo's passenger terminal - 2023.
We highlight that this National Port Administration obtained renewable energy certificates issued by the state-owned utility, Power Plants and Electric Transmissions (UTE), under the Ministry of Industry, Energy, and Mining, for the years 2021, 2022, and 2023. These certificates are presented as Annexes (Annex B).

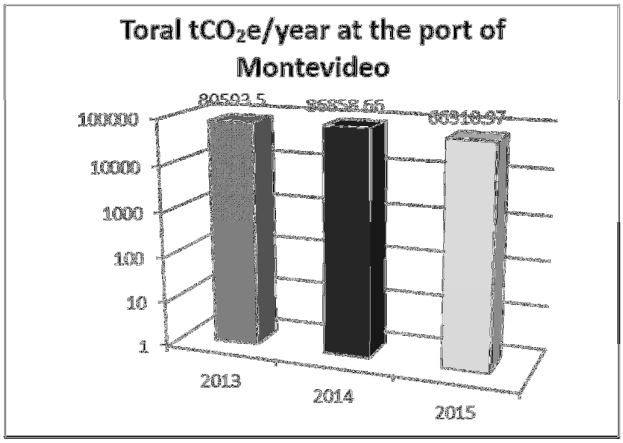
3.3.8 Carbon Footprint

This indicator was measured through a study carried out under an agreement with the University of the Republic (Faculty of Engineering - Institute of Physics) where different emission sources were identified: vehicle circulation both within and outside the port area, ships, port machinery, oil refinery of the State-owned oil company (ANCAP), “Jose Batlle y Ordoñez” thermal power plant that belongs to the State-owned electrical power company (UTE), which became a back-up plant when the energy mix of the country changed and, therefore, there are random emissions from oil combustion depending on the electrical power demand.

The carbon footprint value is a baseline value. The possibility of having equipment with fixed sensors in the future, to record the values for a continuous monitoring and, among other measures, designing related projects in order to reduce said value, is being considered.

Carbon footprint measurement studies were not carried on during the years 2019-2020, as a consequence of the pandemic situation of COVID-19 at a national level. This reduced the research studies dependent on the University of the Republic together with this Port Administration, since the renewal of the agreement between said university and this Port Administration is pending and the formalities have been delayed as a result of the administrative processes affected by the health situation of the country.

Years	CO_2	NO_2	CH_4	Total tCO_2e
2013	79455.99	1117.97	19.54	80593.5
2014	65632.72	1204.87	21.06	86858.66
2015	65382.94	919.96	16.08	66318.97



	2015	2016	2017	2018
Port ships	1.1	0.9	1.1	1.3
Offshore ships (1)	90.7	93.3	105.3	144.9
Total, Criterion 1	91.8	94.1	106.4	146.2
Offshore ships (2)	66.2	73.8	82.3	128.9
Total, Criterion 2	67.2	74.6	83.4	130.2
Total (Average)	**79.5** ± 15%	**84.4** ± 15%	**94.9** ± 12%	**138.2** ± 6%

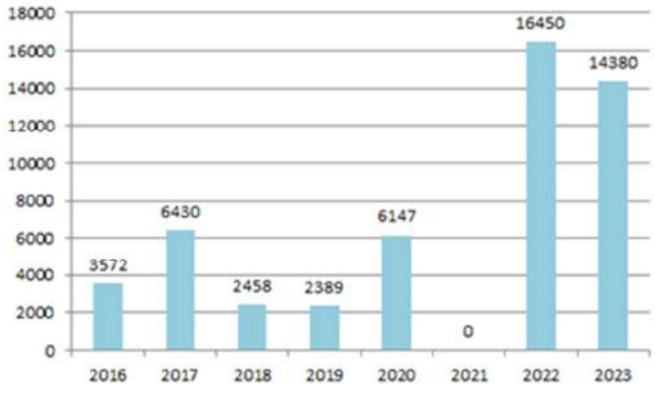
Table 24.- Annual emissions for ships in hotelling mode in kton of CO2 equivalent, according to the adopted criteria. The final average value represents the real emissions.

3.3.9 Office Paper Recycling

All ANP's employees collect waste paper from the offices that is then used as raw material for the REPAPEL Project, which involves the development of the environmental education project, talks, workshops and the delivery of school supplies made of recycled paper to public schools, thus supporting public schools located in the area surrounding the Montevideo Bay. Besides being an environmental and educational project, this is a Corporate Social Responsibility (RSE) action.

Fig. 9 - Day of delivery of school supplies to public schools.

Year	2016	2017	2018	2019	2020	2021	2022	2023
Paper (Kg)	3572	6430	2458	2389	6147	0	16450	14380



3.3.10 Physical and Chemical Quality of Water at Commercial Docks

Between 2008 and 2011, the Environmental Management Unit set the baseline for the physical and chemical parameters of water at commercial docks. Parameters are measured with a multiparameter probe, the length of which has changed based on the deepening of the basins, using the units (boats) of the Fleet and Dredging Department as a platform.

Since 2008 and until the edition of this document, the following parameters have been recorded on a monthly basis:

- Temperature °C
- Conductivity $mS.cm^{-1}$
- Salinity ppt
- Turbidity $g.L^{-1}$ - NTU
- Dissolved oxygen $mg.L^{-1}$
- pH $[H^+]$

Turbidity is measured using a probe in ($g.L^{-1}$) and a Secchi disc to obtain the values in nephelometric turbidity units (NTU) in order to generate a water quality index (ICA), which is currently being developed.

This pilot plan has become a regular program carried out annually through campaigns. Under the program for physical and chemical quality of water at the commercial docks several measurements have been carried out, such as monitoring of the works for the construction and extension of Dock C.

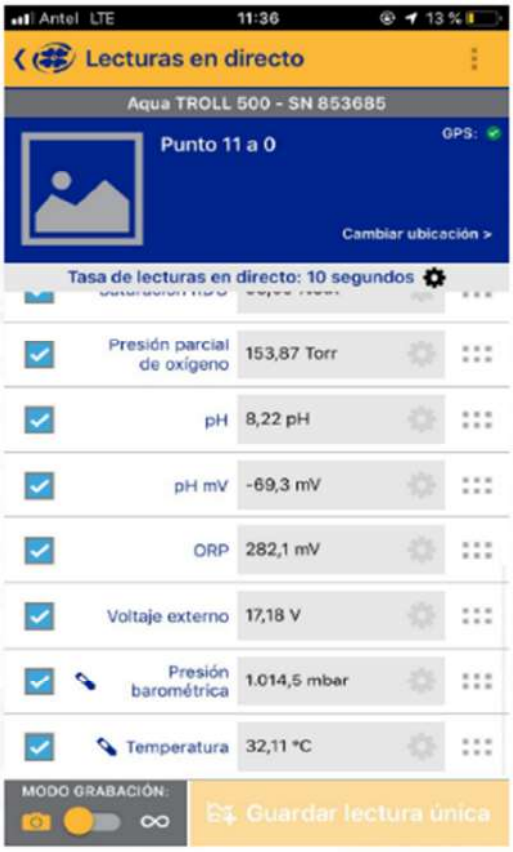
In 2021, the National Ports Administration purchased a new multiparameter probe “IN- Situ Aqua TROLL 500”. The Aqua TROLL 500 is a fully customizable multiparametric probe with interchangeable sensors and a smartphone interface that provides accurate data and enables simplified calibration, panoramic data display and reporting.

This new tool enabled the incorporation of new sensors which will help this port administration to monitor new indicators, such as:

- Chlorophyll a
- fluorescein WT

The data obtained and processed for the different parameters during the years 2019 and 2020 is contained in the environmental indicators report. Below are some examples of the work screen displayed in a smart device connected to the multiparameter probe.

Images of smart device connected to the probe.



3.3.11 Policy and indicators

Table 1 - Policy and indicators								
Results of Environmental Policy action plans							Measurable goals	
N°	Significant environmental aspect	Environmental impact/problem	Port Policy	Measure taken	Responsible actor	Performance indicator	2023	2024
1	**Infrastructure Works**	Relevant environmental aspects in the area of influence of the port infrastructure works	Control environmental pollution from different port operations	Manage all corresponding permits before the Ministry of Environment of Uruguay	General Manager, National Port System Area Manager and Infrastructure Area Manager	Number of procedures carried out at the Ministry of Environment	**3**	**3**
2	**Ship bilge water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) managed	**3824**	**3465**
3	**Solid waste removal services from ships**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) managed	**2118**	**2060**
4	**Grey and black water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (m3 managed).	**2971**	**4624**

5	**Handling of Dangerous Cargo**	Pollution to water, soil, biodiversity, public health or visual health.	Environmental care and application of international and national regulations	Inspections of terminals and intraport warehouses	General Manager, National Port System Area Manager.	Number of inspections performed.	**573**	**297**
6	**Stakeholder engagement in environmental issues at the Port of Montevideo**	All environmental impacts/problems	Development of areas of participation (CEGAP - Port Coordinator)	Number of meetings per year	National Port System Area Manager and Operations Manager	Number of Meetings	**42**	**41**
7	**Quality of dredged material and its disposal**	Pollution of the seabed or body of water	Compliance with international and national standards	Sediment sampling and analysis in external laboratories.	Head of Environment and Environmental Representative Professional	Number of Samples	**316**	**0**
8	**Ship operations, cranes, and port equipment. (*)**	Generation of greenhouse gases	Adopt and implement measures to minimize environmental impacts in port operations	Changing equipment or vehicles to hybrid or electric systems	Terminal managers and/or port operators	Quantity of vehicles or equipment purchased	**0**	**12**

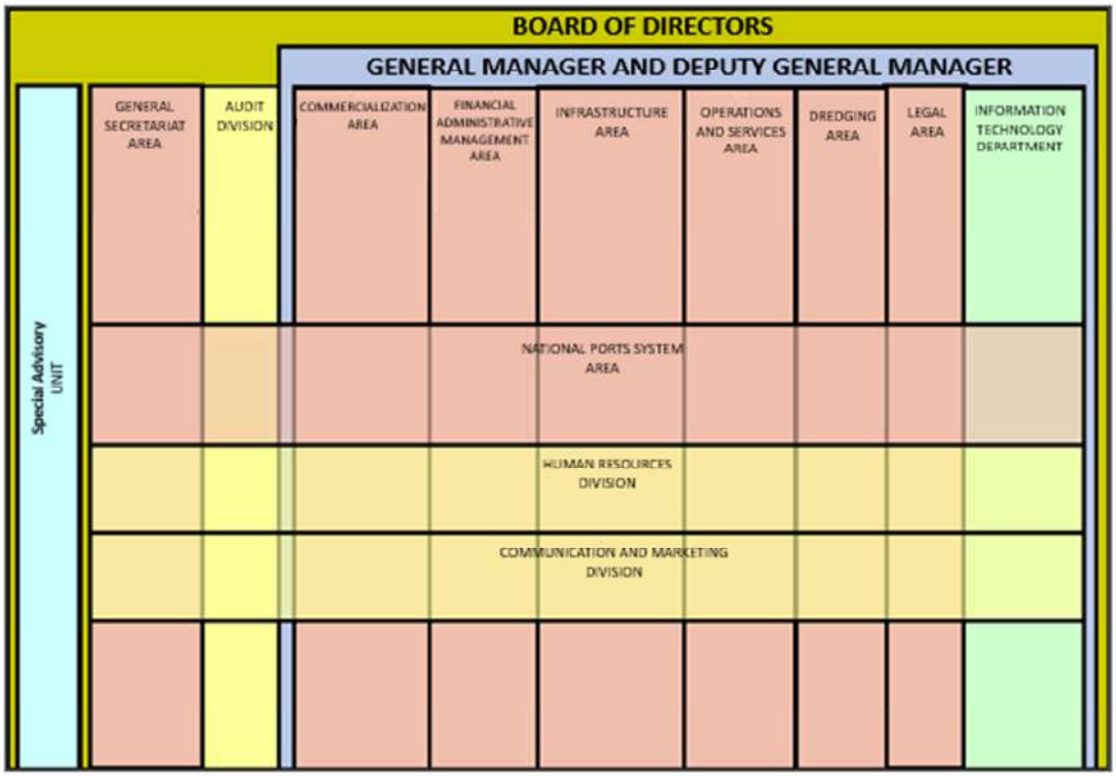
4. DOCUMENTED RESPONSIBILITIES AND RESOURCES RELATED TO ENVIRONMENTAL ASPECTS (Section 1.3 of PERS)

4.1 Structure of the Organization

The National Ports Administration, and particularly the Port of Montevideo, have a matrix organization where the operational, administrative and support areas are horizontally integrated through the National Ports System Area.

This Area is comprised of the Management Systems Department, which includes the Environmental Management Unit.

The relations between the different areas, departments and the management level defined for the Port of Montevideo are detailed in the following figure:


BOARD OF DIRECTORS
GENERAL MANAGER AND DEPUTY GENERAL MANAGER
Special Advisory UNIT
GENERAL SECRETARIAT AREA
AUDIT DIVISION
COMMERCIALIZATION AREA
FINANCIAL ADMINISTRATIVE MANAGEMENT AREA
INFRASTRUCTURE AREA
OPERATIONS AND SERVICES AREA
DREDGING AREA
LEGAL AREA
INFORMATION TECHNOLOGY DEPARTMENT
NATIONAL PORTS SYSTEM AREA
HUMAN RESOURCES DIVISION
COMMUNICATION AND MARKETING DIVISION

4.2 Environmental Responsibilities of Key Personnel

Taking into account the scope defined, the following chart shows the personnel within the organization who have direct responsibilities that have been established and described regarding the environmental aspects of the operations to be certified.

RESPONSIBILITIES OF KEY PERSONNEL		
AREAS OF RESPONSIBILITY	**JOB TITLE OR POSITION**	**DEPARTMENT**
Senior Management and Strategic Planning	President	President's Office and Board of Directors (Management Team)
Environmental System Management	Environmental Technical Representative	Environmental Management Unit
Port management actions coordination Adoption of actions in order to protect the port environment	Delegates with technical expertise appointed by public and private bodies, port union, etc. (Port community)	Port Environmental Management Executive Committee
Assessments and Applications of Environmental Authorizations	Environmental Technical Representative	Environmental Management Unit
Port infrastructure construction works	Construction Managers	Infrastructure Area
Planning prior to dredging (sediment toxicology)	Environmental Technical Manager	Environmental Management Unit
Planning for dredging execution	Head of Dredging Area	Dredging Area
Dredging execution	Head of Fleet and Dredging Department	Fleet and Dredging Department
Port Operations Management of waste from ships 1 - Sewage 2 - Solid waste from ships 3 - Bilge water	Head of Health and Supply Unit Head of Operations and Services Area	Health and Supply Unit Operations and Services Area
Port Operations (hazardous cargo) Decrees regarding hazardous cargo classification Authorization to operate with	Head of Environmental Management Unit	Environmental Management Unit (hazardous cargo)

hazardous cargo at the port area Inspections of terminals and warehouses		
Emergency planning	Port Facilities Protection Officer (OPIP) Coordination of contingency plans with competent authorities	Operations Area Competent authorities: (Prefecture, Fire Department, Ministry of Public Health, Environmental Management Unit, Occupational Health and Safety Unit, Customs, Police, National Emergency System, etc.)

4.2.1 Environmental Technical Representative

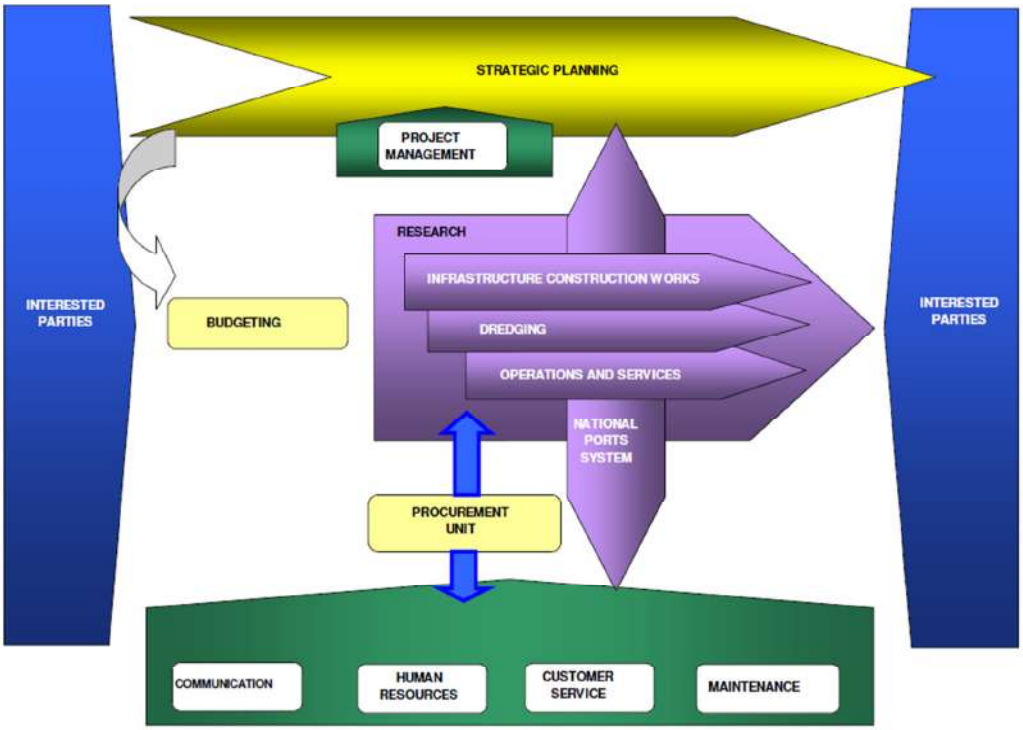
Position	Name	Telephone	Mail
Chemistry Graduate	**Lorena Leal**	**+5982 1901/ 2864**	**lleal@anp.com.uy**

Duties:

- To disseminate the environmental principles and the environmental policy defined by ANP by every possible means.
- To provide technical advice regarding environmental issues to the Board of Directors and all Areas of ANP for the adoption of measures to prevent environmental impacts, and to search for and propose the purchase of environmental technology equipment to improve the system.
- To organize and oversee the implementation of an Environmental Management System and monitor it in a continuous improvement process.
- To foster relations and coordinate studies and research with universities and technological and scientific institutes in order to define assessments of the aspects that might have a negative impact on air, soil or water, and look for remediation and innovation solutions to achieve sustainable improvements.
- To plan yearly activities according to measurable objectives and assess their performance at the end of the year.
- To represent ANP before national and international organizations dedicated to environmental issues.
- To produce Environmental Impact Assessments for the development of port projects to be submitted to DINAMA (Decree No. 349/005).
- To study and analyze the Environmental Impact Assessments of projects carried out by private environmental consulting firms that involve port development initiatives.
- To create prevention plans for possible environmental impacts analyzing nonconformities of port operators, warehouses and terminals, and to provide technical advice regarding the corrective measures to be implemented.
- To coordinate the Port Environmental Management Executive Committee.
- To address claims from users, employees and neighbors regarding environmental issues, keep a record thereof and provide advice on possible solutions.
- To disseminate information and provide training regarding environmental issues to all employees, as well as all parties within the port sector and other stakeholders.
- To provide advice to government authorities within the scope of their duties on environmental assessment from a strategic point of view.

4.2.2 Process Flowchart

The following diagram is an overview of the interrelations of the processes to be certified and their internal and external components.



4.3 Courses on Environmental Aspects

4.3.1 Port Orientation Course

When new staff is hired, orientation regarding all aspects of port activity is provided and the staff is taken to the site to have a comprehensive picture of the activities, roles and risks related to work and the environmental impacts of the operations and services.

Said orientation course is taught by staff and experts from Human Resources and the Management Systems Department, Environmental Management Unit, Occupational Health and Safety Management Unit and the Port Union (SUPRA), in order to provide and/or level out knowledge and raise awareness among employees about all the environmental aspects related to the port activity.

Upon completion of the course, ANP generates an internal record stating the training provided, which is also recorded in the personal file of each employee. An example of compliance with the orientation course is posted on ANP's YouTube channel and can be accessed through the following link. https://www.youtube.com/watch?v=8At_rBXJ-HQ
Due to the fact that several professionals and experts work as facilitators of the EIA of Executive Projects, staff from Infrastructure, Dredging, Operations and Services Areas, as well as Environmental Management Unit experts, were strategically trained in Environmental Management Specialist courses.

4.3.2 Course on Hazardous Cargo

ANP provides training regarding hazardous cargo through the centers authorized by the National Naval Prefecture as a representative of the International Maritime Organization (IMO) for the Republic of Uruguay. Said training is available for all employees whether they handle hazardous cargo or not. Said centers issue the

corresponding training certificates and ANP, through the Department of Human Resources, keeps a record of them.

This training also complies with Maritime Provision No. 146/014, under which all ground staff that works directly with hazardous cargo or is involved in hazardous cargo operations is required to be up to date with said training.

4.3.3 Environmental Management Specialist Course

ANP, through the Uruguayan Institute of Technical Standards (UNIT), provides training to become an Environmental Management Specialist under the UNIT-ISO 14000 standard. Said training enables staff to implement, assess and improve environmental management systems according to the model of the UNIT-ISO 14000 standard. The training requires passing the following courses:

- Quality Management and Integrated Systems
- Standardization and Conformity Assessment
- Management System Manuals and Documents
- Environmental Quality and Sustainable Development
- Environmental Management and Performance
- Clean and End-of-pipe Technologies
- Eco-labeling and Life Cycle Assessment
- Solid Waste Management
- Environmental Auditing

4.3.4 Ibero-American Course on Port Technology, Operations and Environmental Management (CIP/OAS)

The purpose of this course is to provide technical, specialized, and state-of-the-art training in the areas of port operations and port environmental management, using the most advanced methodologies and techniques in these fields, with special reference to Spanish cases and experiences.

The courses are assessed and certified by the Universities of Cataluña and Menéndez Pelayo.

4.3.5 Communication

ANP's General Management, the National Ports System Area, the Management Systems Department and its Environmental Management Unit ensure that appropriate communication channels are established according to the internal and external communication procedure.

An example of communication through ANP's YouTube channel, is the video shown on the monitoring of the physical and chemical quality of water at the commercial docks of the Port of Montevideo. https://www.youtube.com/watch?v=6g2TQVtVlHw

Other communication channels include *Puertonline*, where different port milestones are posted and information about sustainable environmental activities (such as the REPAPEL project) and outreach activities related to the World Environment Day are disseminated.

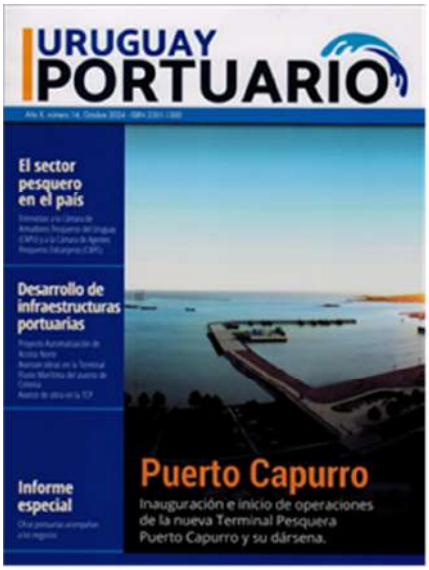


Fig. 10 - *Uruguay Portuario* magazines

ANP's *Uruguay Portuario* magazine, where articles on port activity are published, is also used as a communication channel.

Other outreach activities regarding Port Environmental Management are carried out in coordination with different educational institutions, as well as involvement in conferences and congresses as speakers on environmental issues.

ANP's Website, Port of Montevideo - Port Environmental Management link:
http://www.anp.com.uy/inicio/institucional/sistemas_de_gestion/gestion_medio_ambiente

4.4 Overview of Allocated Resources

	BUDGET FOR ENVIRONMENTAL MANAGEMENT		
	UYU	**USD**	**Comment**
Consulting and calibrations		160,000.00	for calibration (life jackets, multigas RKI equipment, altair equipment), geotechnical studies, laboratory analysis (precious metals and hydrocarbon/PCBs) and other environmental impact studies
Access channel dredging consulting		**200,000.00**	**for access channel dredging to 14 m.**
Investments		25,000.00	multiparameter probe for water quality monitoring (according to C/S 1573/21 final cost was USD 15,000)
Technology		**2,102,850.00**	**mobile ballast water treatment plant (validity in doubt)**
Agreement with UDELAR	7,250,000.00		
Trainings			**no specific amount stipulated for training in the 2022 budget or in the 2021 hiring plan**

Compliance Review Table										
Results of Environmental Policy Action Plans							Measurable goals		Conclusions on the policy outcomes of the past two years and recommendations for the coming years.	Conclusions on the political plans for 2025-2026
N°	Significant environmental aspect	Environmental impact/problem	Port Policy	Measure taken	Responsible actor	performance indicator	2023	2024		
1	**Infrastructure Works**	Relevant environmental aspects in the area of influence of the port infrastructure of the projects	Control environmental pollution from different port operations	Manage all corresponding authorizations before the Ministry of Environment of Uruguay	General Manager, National Port System Area Manager and Infrastructure Area Manager	Number of procedures carried out at the Ministry of Environment	**3**	**3**	The objective has been met, with all necessary permits obtained from the Ministry of the Environment.	The objective has been successfully met and is intended to be maintained for the next two years.
2	**Ship bilge water removal services**	Water, soil, biodiversity, public health or visual pollution.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (Tons) managed	**3824**	**3465**	All requests for vessels in port have been met.	It is considered that sufficient experience has been acquired to study the expansion of the bilge water reception service for vessels operating offshore.
3	**Solid waste removal services from ships**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) Managed	**2118**	**2060**	All requests for vessels in port have been met.	The goal is to improve solid waste management in order to increase waste recovery (recycling). Possible alternatives during collection to facilitate management are being studied.
4	**Grey and black water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (m3) managed.	**2971**	**4624**	All requests for vessels in port have been met.	The Ministry of the Environment is reviewing Decree 253/79, which contains water quality parameters, at the request of delegates from the CEGAP (National Water Commission) as a way to optimize this service.
5	**Handling of Dangerous Cargo**	Pollution to water, soil, biodiversity, public health or visual health.	Environmental care and application of international and national regulations	Inspections of terminals and intraport warehouses	General Manager, National Port System Area Manager.	Inspections carried out.	**573**	**297**	The objective is met.	The objective has been successfully met and is intended to be maintained for the next two years.

6	**Stakeholder participation in environmental issues at the Port of Montevideo**	All environmental impacts/problems	Development of areas of participation (CEGAP - Port Coordinator)	Number of meetings per year	National Port System Area Manager and Operations Manager	Number of Meetings	**42**	**41**	The objective is met.	CEGAP meetings have been increased, incorporating a monthly environmental meeting in addition to those already held by the sub-coordinator.
7	**Quality of dredged material and its disposal (*)**	Pollution of the seabed or body of water	Compliance with international and national standards	Sediment sampling and analysis in external laboratories	Head of Environment and Environmental Representative Professional	Number of Meetings	**316**	**9**	The objective of evaluating the dredged material prior to carrying out opening dredging works is met.	The objective has been successfully met, and it is intended to remain the same for the next two years.
8	**Ship operations, cranes, port equipment. (*)**	Generation of greenhouse gases	Adopt and implement measures to minimize environmental impacts in port operations	Changing equipment or vehicles to hybrid or electric systems	Terminal managers and/or port operators	Quantity of vehicles or equipment purchased	**0**	**12**	The greenhouse gas reduction target is met through the adaptation of hybrid or electric equipment.	The objective has been successfully met, and it is intended to remain the same for the next two years.

(*) The quality of the dredged material is assessed in opening dredging, not maintenance dredging.

Expediente 23094 - (Zona de giro TCP - 52 muestras de sedimento (39 superficiales y 13 a profundiad de -1m)
Expediente 231210- Canal de acceso a -14m- 65 puntos de cateo - 264 muestras

5. CONFORMITY REVIEW OF ENVIRONMENTAL POLICY AND LEGAL REQUIREMENTS (Section 1.4 of PERS)

The National Ports Administration manages its operations and services in compliance with the environmental regulations in force and applicable to each activity, in line with its Environmental Policy, which is reviewed and adjusted as appropriate.

In order to comply with these requirements, several management tools are used to ensure their agreement with the benchmarks set in the corresponding regulations and said requirements are included in manuals, procedures, protocols, instructions, etc.

These documents are reviewed and updated on a regular basis, including when amendments are made to the applicable legislation or regulations. In July 2023, Guyer & Regules was hired to provide external legal advice specializing in environmental law for the analysis and verification of the environmental regulations issued by the ANP. This advice verified that the ANP's report on current national and international regulations was up-to-date and complete. The memorandum corresponding to this legal advice is attached (Annex A) to this document.

The ANP also has financial, human and material resources available for achieving the environmental goals, acting by itself and in cooperation with other agencies, universities or consulting firms hired for such purpose.

Studies commissioned under agreements with the University of the Republic (UdelaR) provide relevant scientific and technical information for new port development projects (inputs for the EIA and other requirements set forth in the legislation in force) and for the improvement of port environmental management as a whole.

ANP, and particularly the Environmental Management Unit, maintains close ties with other organizations, government and municipal agencies, and port operators through the Port Environmental Management Executive Committee in order to take actions aimed at complying with regulations and improving the processes and approach to new challenges related to port environmental aspects.

Based on the data obtained from its records (statistics, inspections, sampling, reports, etc.) and from studies commissioned under agreements, Environmental Performance Indices are created. Said indices are set forth in this document and will be used as reference for subsequent reviews, in order to assess the improvements in management, and for further certifications.

Item 5 - Stakeholder Engagement					
STAKEHOLDERS		**MANAGEMENT**	**NEEDS**	**EXPECTATIONS**	**GOALS**
Customers	Shipowners Customs Brokers Carriers Maritime Agencies	Close collaboration, personalized attention, and appropriate handling of complaints.	Stay informed about changes in port operations as well as the daily status of the Port (work stoppages, operational closures due to weather reasons, etc.)	Personalized attention. Receive the services you request in the shortest possible time. Receive 24/7 information on the status of the requested services.	Annual
Business Chambers	Navigation Center (CENNAVE) Chamber of Fishing Industries of Uruguay Chamber of Foreign Fishing Agents Chamber of Commerce and Services of	Close collaboration, personalized attention, and appropriate handling of complaints.	Stay informed about changes in port operations as well as the daily status of the Port (work stoppages, operational closures due to weather reasons, etc.)	Personalized attention. Receive 24/7 information on the status of the Port.	Annual

	Uruguay Union of Exporters of Uruguay				
Suppliers	Waste Managers	Working closely together, ensuring proper treatment of port waste	Promptness in performing the services requested by the Port. Submitting supporting documentation.	Receive waste in conditions that can be managed, without the presence of other waste unrelated to the management agreed to be carried out	Monthly
Autoridades	Ministry of Environment	I work closely together, providing requested documentation regarding authorizations and/or complaints received.	Stay informed of the status of the procedures submitted to the Ministry as well as the status of the environmental management of the Port	Receive responses to inquiries as quickly as possible. Receive documentation for ongoing procedures with all the information required to carry them out. Submit periodic reports on port environmental management in a timely manner.	Monthly
	Ministry of Public Health (MSP)	Working closely together, jointly managing the presence of vectors in the port area	Stay informed about the presence of vectors in the port area	Receive information on the presence of vectors in the port area	Annual
	Intendance of Montevideo	Working closely together, jointly managing waste from the services the Port provides to ships.	Stay informed about the status of the waste received by the Intendancy as a result of the services offered by the Port to ships	Receive information regarding the status of the waste received by the Intendancy as a result of the services offered by the Port to ships	Annual
	Ministry of Livestock, Agriculture and Fisheries (MGAP)	Working closely together, joint management of organic waste from internationally flagged vessels	Stay informed about the status of organic matter from internationally flagged vessels	Receive information regarding the status of organic products from internationally flagged vessels	Annual
	Ministry of Industry, Energy and Mining (MIEM)	Working closely together, joint management of cargo classified as "Radioactive" arriving at the Port	Keep us informed about the status of cargo classified as "Radioactive" arriving at the Port. Coordinate with the Ministry at the time of the operation.	Receive information regarding the status of cargo classified as "Radioactive" arriving at the Port and the relevant operations that will be carried out with them.	Annual
	National Fire Department (DNB)	Working closely together, jointly managing incidents that occur during port operations.	Keep us informed of incidents that occur in port operations	Receive information about incidents that occur in port operations	Annual
	National Naval Prefecture (PNN)	Working closely together, jointly managing incidents that occur during port operations, coordinating the inspection and clearance of warehouses with dangerous cargo.	Stay informed of incidents occurring in port operations and of non-compliance detected in warehouses with dangerous cargo	Receive information on incidents that occur in port operations and on non-compliance detected in warehouses with dangerous cargo	Annual
General	Port Community	Close collaboration to carry out joint care of the environment	Receive social assistance, not environmental pollution.	Implementation of the environmental management system, compliance with the Port's Social Responsibility Program.	Annual

6. ENVIRONMENTAL REPORT (Section 1.5 of PERS)

Environmental Protection at the Port of Montevideo

Fig. 12 - The Port of Montevideo with the *Cerro (Hill)* area in the background.

During the 19th and 20th centuries, several industries (meat salting and meat processing plants, tanneries, etc.) grew and then disappeared at the Montevideo Bay, where the port is located. In light of new sustainable development concepts, which were not applied back then, said industries left their environmental liabilities.

Since 2003, based on the guidelines arising from the Rio Summit in 1992, port environmental issues have been addressed by gradually incorporating port services and port development works into the aforementioned sustainability criteria and environmental regulations adopted by the Uruguayan government, as well as international agreements ratified by its Parliament.

The aim of the Environmental Policy of the National Ports Administration (ANP) is to preserve, prevent and improve the environmental conditions of the Port of Montevideo. For that purpose, several actions and research activities are carried out and new technologies are incorporated for the preservation and reduction of impacts on the environment so that it remains in suitable conditions for use by future generations.

In order to comply with national and international environmental protection laws and regulations, ANP created, within its structure, the National Ports System Area and the Management Systems Department, which includes the Environmental Management Unit, based on a cross-sectional approach, with the aim of taking into consideration the relationship between development and sustainability.

The Environmental Management Unit has been working with a key tool to ensure compliance with environmental legal requirements for operations and services. This tool is the Port Environmental Management Executive Committee (CEGAP), which is composed of experts from public bodies and port-related government agencies, as well as the private sector and the Single Union of Workers of the Port and Related Sectors (SUPRA), so that the Environmental Policy is reflected in the jointly coordinated actions carried out.

Besides these joint actions with the port community, ANP also has to comply with the requirements of Decree No. 349/05 regarding Environmental Impact Assessment due to its location, because port works are carried out in the coastline or at supralittoral, eulittoral and infralittoral areas (such as initial dredging). Environmental impact assessments are to be conducted for all works and submitted to the corresponding authorities.

The authorizations required include the Environmental Viability of the Location (VAL), aiming at developing urban and land planning instruments according to the land use planning (POT) of the Municipality of Montevideo and the land planning requirements of the National Directorate of Land Planning (DINOT) of the Ministry of Housing and Land Planning , as well as the environmental authorizations required by the Ministry of Environment (DINACEA) for activities, constructions or works projects as per the aforementioned decree.

Description of the nature and size of port activities at the Port of Montevideo

Goods handled by cargo type in 2023			
TYPE	LOADING	UNLOADING	TOTAL
General cargo	2.224.965	355.965	2.580.930
Containers (*)	5.283.993	4.602.067	9.886.060
Bulk cargo	2.235.097	1.159.453	3.394.550
TOTAL	9.744.055	6.117.485	15.861.540

Total tonnes including container weight, preliminary data.
(*) Includes containerized transshipments.

Containers and TEUs handled in 2023			
	FULL	EMPTY	TOTAL
Containers	490.663	159.781	650.444
TEUs	836.235	289.519	1.125.754

River and sea terminal - Movement of passengers in 2023			
TYPE	EMBARKING	DISEMBARKING	TOTAL
River passengers	306.954	291.513	598.467

(**)Passengers on board/Does not include crew

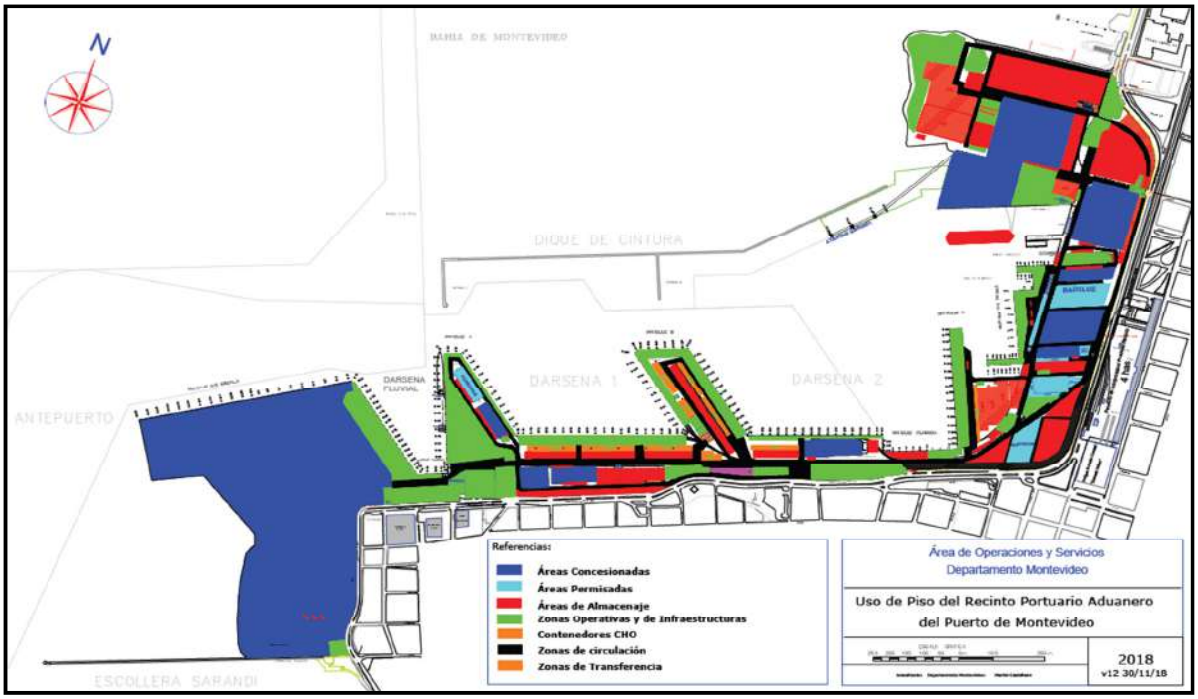


Fig. 13 - Map of the areas of the Port of Montevideo

ENVIRONMENTAL PRINCIPLES STATEMENT OF THE
NATIONAL PORTS ADMINISTRATION

The National Port Administration, as an essential actor in achieving the most appropriate sustainable port development and therefore directly supporting Uruguay's commercial activities, undertakes to:

1) *Respect current national environmental legislation as well as those conventions, guidelines, and resolutions internationally ratified by the Eastern Republic of Uruguay and aimed at protecting the port environment.*
2) *Act, in accordance with the Constitution, the Law, and other Agreements, in accordance with the ethics of sustainable development.*
3) *Take voluntary measures to consider, whenever possible and appropriate, the timely application of domestic environmental standards in accordance with the Law.*
4) *Oversee, through its General Management, environmental policies and measures in accordance with the guidelines issued by the Institution's Board of Directors.*
5) *Establish an Environmental Management System to introduce environmental protection as an integral part of business and management practices. The Environmental Management System (EMS) will aim to:*

• *Promote environmental ethics among port stakeholders, associated entities, or those related to them, and encourage the importance of individual responsibility in general and, specifically, in the application of the EMS.*

• *Establish response plans to address any potential incident in port areas, minimizing negative environmental impacts on river, marine, and land areas that could cause damage to the marine and coastal ecosystem and the environment in general.*

• *Conduct periodic reviews and revisions of the Environmental Policies and the Environmental Management System, taking into account the results of the most recent research related to the environment and trade dynamics.*

• *Provide all personnel with the necessary support to adopt proactive attitudes regarding environmental issues, emphasizing that the maintenance and preservation of environmental quality is the responsibility of all those who perform tasks in the Company.*

• *Integrate the environmental dimension into the Company's plans, programs, activities, and operations at all stages.*

• *Promote the most appropriate integration of ports into the respective cities.*

• *Incorporate procedures that guarantee compliance with current national and departmental environmental regulations.*

• *Adopt the necessary actions to implement comprehensive compliance with environmental guidelines, including those of MERCOSUR, IMO (MARPOL 73/78), relevant ISO standards, and the environmental directives of the World Trade Organization.*

• *Provide, whenever possible, adequate resources to support research on environmental issues related to the sector's activities.*

• *Constantly seek options for improving port environmental issues by studying and analyzing the most developed ports around the world, using the benchmarking methodology.*

• *The Environmental Management System will be a tool used to improve environmental parameters, such as*

air quality monitoring, and will allow for the establishment of corrective measures if necessary. This Environmental Management System will also aim to establish goals to reduce sources of pollution. It will also be a priority to work on optimizing port waste management as much as possible, initially promoting reduction and, if not possible, working toward waste recovery (recycling).

• The objective will be to participate in the development of proactive port development strategies, seeking to minimize the environmental impact that implementing actions that contribute to port development can have on the growth of the city.

• Monitoring mechanisms will be established for the quality of marine sediments, in order to protect ecosystems within the port's area of influence, as well as to control relevant parameters in the sediment disposal areas corresponding to dredging.

6) *Promote training for all ANP officials and those involved in port operations in environmental preservation and good practices.*
7) *Constantly seek environmental improvement at the Port by studying and analyzing other, more developed ports around the world using the benchmarking methodology.*

Approved by the Resolution of the Board of Directors 661/3,268 on 18/Dec/2002 (File No. 021758)
Updated by the Resolution of the Board of Directors 172/3,974 on 27/Mar/2019 (File No. 182118)
Updated by the Resolution of the Board of Directors 421/4,267 on 17/Jul/2025 (File No. 251462)

ADMINISTRACIÓN NACIONAL DE PUERTOS
República Oriental del Uruguay

ENVIRONMENTAL POLICY OF THE PORT OF MONTEVIDEO

Montevideo, 17 July 2025.

The Port of Montevideo acknowledges its responsibilities regarding environmental prevention and preservation as outlined in the Environmental Principles of the National Ports Administration. Therefore, it commits to:

1. *Adopting, documenting, implementing, and maintaining the necessary measures to minimise environmental impacts that may result from port operations in general.*

2. *Setting goals and objectives aimed at controlling emissions to land, sea, and air, striving for continuous environmental improvement of port activities within its scope. This requires the identification and control of the port's significant environmental aspects.*

3. *Recording all activities defined within management processes to serve as indicators of environmental performance.*

4. *Complying with and closely observing all environmental legal requirements, standards, and procedures within its direct jurisdiction and in its concession areas. This includes preventing adverse environmental effects, safeguarding the community, businesses, the port community, and the general population. Where possible, environmental standards will be improved beyond the requirements of legislation.*

5. *Maintaining an inventory of relevant environmental legislation and regulations, whether national, international, or derived from commitments undertaken. This inventory will be updated annually at the latest by the competent offices.*

ADMINISTRACIÓN NACIONAL DE PUERTOS
República Oriental del Uruguay

6. Establish the necessary communication channels to broadly disseminate to staff, suppliers, concessionary companies, and society as a whole the procedures, established standards, and environmental programs through the publication of a biennial report (every 2 years) that outlines progress and new environmental requirements. This includes publishing environmental performance on our website.

7. Ensure the availability of the necessary resources for the implementation of the Environmental Policy so that port services meet the requirements that guarantee minimal environmental impact through their monitoring, in order to protect port areas and adjacent zones.

8. Promote and provide training on environmental topics to raise awareness among employees, encouraging them to incorporate good environmental practices into their daily activities. In addition, promote corporate social responsibility by collaborating with environmental NGOs.

9. Serve as the headquarters of the Executive Committee for Port Environmental Management (CEGAP) in order to provide a platform for engagement with Authorities, the Port Community, and society as a whole for the development of environmental programs and contingency prevention. Likewise, the CEGAP will be an essential tool for recognizing and addressing the needs and expectations of all port stakeholders.

10. In line with the objectives set by the United Nations (SDGs), our ports will strive to comply with those goals within their scope (in particular SDGs 7, 8, 9, 11, 12, 13, 14, and 17).

11. This Port Administration is committed to meeting the needs and expectations of our clients and other interested parties in accordance with the current legal framework.

12. This Policy shall be reviewed regularly or when its scope is expanded.

Approved by ANP Board Resolution No. 421/4.267.

Ing. Civil PABLO GENTA
President
Administración Nacional de Puertos

Main Environmental Aspects, Impacts and Environmental Performance of the Port of Montevideo

The main environmental aspects related to port operations and services of the Port of Montevideo are those considered to be significant by ANP according to an algorithm that determines their importance, as well as those considered to be a priority for sustainable development by the Board of Directors jointly with the Environmental Manager.

- Aspects related to port development works
- Bilge water discharge
- Sewage discharge
- Discharge of solid waste from ships
- Extraction and disposal of dredged material
- Hazardous cargo handling
- Waste management
- Abandoned ships

Said aspects are identified using the environmental aspects identification procedure and assessed according to its guideline.
The applicable environmental legislation is identified using the regulatory and legal requirements procedure and updates thereof.

For infrastructure works, the Port of Montevideo also has an environmental manual on construction works (port sector) available at ANP's website.

The provisions regarding hazardous cargo handling (IMDG) are available on the website and in the link above, the Manual for Handling Hazardous Cargo, pursuant to Decree 183/94 (Harbor Masters):

https://www.anp.com.uy/sites/default/files/archivos/parrafo-colapsable/2021-01/Manual%20de%20Seguridad%20Portuaria%20y%20Cargas%20Peligrosas%20%28Versi%C3%B3n%20Noviembre%202020%29.pdf

The chart below shows a summary of the Environmental Management Indicators of the Port of Montevideo:

MANAGEMENT INDICATORS (IDGs)	
Environmental training	• No. of environmental trainings offered
Hazardous cargo	• No. of inspections / Containers* • Nonconformities / Inspections * Containers with hazardous cargo
OPERATIONAL INDICATORS (IDOs)	
Hazardous cargo	• Incidents
Discharge of sewage from ships. MARPOL IV	• m^3 or tonnes
Discharge of solid waste from ships. MARPOL V	• m^3 or tonnes
Bilge water discharge. MARPOL I	• m^3 or tonnes
Maintenance dredging	• m^3 of maintenance dredging
Initial dredging	• m^3 of initial dredging • m^3 of beneficial use of dredged material / total m^3 of initial dredging
Electrical power	kW/h
Carbon footprint	tCO_2e
Used office paper	Kg of paper collected for recycling Number of supplies delivered to public schools
ENVIRONMENTAL INDICATORS (ICAs)	
Physical and chemical quality of water at commercial docks	• Temperature °C • Conductivity $mS.cm^{-1}$ • Salinity ppt • Turbidity $g.L^{-1}$ - NTU • Dissolved oxygen $mg.L^{-1}$ • pH $[H^+]$

Performance of the Environmental Management System

REQUIREMENT	DESCRIPTION	IMPLEMENTED ACTIONS
Environmental policy	Established as a general framework to contribute to the environmentally sustainable development of the Port of Montevideo.	Adoption of measures to minimize the environmental impact of the operations in the Port of Montevideo. Goals were set out with their management, operational and environmental indicators, based on the assessment of significant environmental aspects of the Port of Montevideo. Availability of resources for environmental management were detailed in the budget of ANP. All the new employees that joined the administration received training.
Legal requirements related to environmental aspects	Collection of regulations applicable to port environmental management and to environmental aspects of port activities	Periodical verification of applicable regulations as well as compliance and updating thereof. The legislation applicable to each environmental aspect is verified depending on the regulations, through compliance, inspection, etc. (See the Conformity review of environmental aspects chart).

Environmental assessments	Assessments performed under agreement with the University of the Republic or other organizations, consulting firms, etc., as inputs for EIA, improvements in the Environmental Management System and innovation	The Port of Montevideo, in accordance with the environmental policy and the goals set out, has financial and specific resources for conducting these environmental assessments in different areas based on the required goal.
Training	Education in environmental matters in connection with the port activity	There is a budget and a training plan in the organization.
Air quality	Process of identification of air pollutants generated as a result of the port activity	Monitoring of solid bulk operations (PM10). Recommendations for environmental management plans (PGA) adapted to different operations. Request of PGA for bulks by companies and monitoring thereof. Assessment of the impact of bulk operations on the water mirror. Change of the vehicle fleet to vehicles powered by electric power. Replacement of dredger engines with others with greater power efficiency.
Water quality	Process of monitoring physical, chemical and biological conditions of the water at commercial docks	Monitoring of physicochemical parameters carried out by ANP. Incorporation of new parameters of fluorescence to chlorophyll and BGA-PC fluorescence of blue green algae as an effective form of measuring phycocyanin cyanobacteria
Soil use	Process of expansion of the port area to reduce congestion and increase the efficiency and safety of operations.	Master plan of the Port of Montevideo and successive revisions thereof, which contains a plan for construction works for the expansion and improvement of port facilities.
Relation with the port community	Coordination between different stakeholders in the port community. Interrelation with society, striving for peaceful coexistence	Within the framework of the Policy, ANP serves as headquarter for the integration of the port community in its different sectors, and in the case of the environment it is carried out by the CEGAP. Engaging in cultural activities for the promotion of environmental and port education. Improvement of port accessibility and planification of uses of port areas for the city. Communication with the community through social media (YouTube, Twitter).
Electrical power consumption	Power consumed at the Port of Montevideo, public and private sector	Independent air conditioning systems were removed and replaced with a centralized system with inverter technology at the headquarter building. In addition, a plan is being implemented to replace existent doors and windows with others of greater insulation efficiency. Change of light bulbs to energy-saving or LED ones in its facilities.

Description of the Port of Montevideo environmental management organization

The annual planning performed by the Environmental Management Unit is designed according to the matrix organization system of the Port of Montevideo and addresses the environmental aspects of the key areas of the management system, acting as facilitator in said task.
The Port Environmental Management Executive Committee is a fundamental tool for the development of the system.

6.1 Environmental Responsibilities of Key Personnel

By virtue of the detailed organization, the following chart provides a summary showing the personnel within the organization having direct responsibilities that have been established and described regarding environmental aspects of the operations.

RESPONSIBILITIES OF KEY PERSONNEL		
AREAS OF RESPONSIBILITY	**JOB TITLE OR POSITION**	**DEPARTMENT**
Senior Management and Strategic Planning	President	President's Office and Board of Directors (Management Team)
Environmental System Management	Environmental Technical Representative	Environmental Management Unit
Port management actions coordination Adoption of actions in order to protect the port environment	Delegates with technical expertise appointed by public and private bodies, port union, etc. (Port Community)	Port Environmental Management Executive Committee
Assessments and Applications of Environmental Authorizations	Environmental Technical Manager	Environmental Management Unit
Port infrastructure construction works	Construction Managers	Infrastructure Area
Planning prior to dredging (sediment toxicology)	Environmental Technical Manager	Environmental Management Unit
Planning for dredging execution	Head of Dredging Area	Dredging Area
Dredging execution	Head of Fleet and Dredging Department	Fleet and Dredging Department
Port Operations Management of waste from ships 3 - Sewage 4 - Solid waste from ships 3 - Bilge water	Head of Health and Supply Unit Head of Operations and Services Area	Health and Supply Unit Operations and Services Area
Port Operations (hazardous cargo) Decrees regarding hazardous cargo classification Authorization to operate with hazardous cargo at the port area Inspections of terminals and warehouses	Head of Environmental Management Unit	Environmental Management Unit (hazardous cargo)

Emergency planning	Port Facilities Protection Officer (OPIP) Coordination of contingency plans with competent authorities	Operations Area Competent authorities: (Prefecture, Fire Department, Ministry of Public Health, Environmental Management Unit, Occupational Health and Safety Unit, Customs, Police, National Emergency System, etc.)

The Environmental Management System is complemented by the Port Environmental Management Executive Committee (CEGAP), which includes experts appointed by ministries, public and private bodies, the port union, the civil society and other interested parties related to the port sector.

The CEGAP creates protocols on risk prevention management for the normal functioning of operations and services provided at the Port of Montevideo. This Committee is an efficient tool to promptly address key issues arising from the intense port activity carried out by the stakeholders of the port community.

The CEGAP is the main management tool adopted within the Environmental Management System to act effectively, efficiently and productively when making strategic decisions for the port managed by ANP, and its application has an effect on the sustainable development of the country.

Regarding port coordination and management, the Environmental Management Unit also participates in other organizations, such as the Permanent Commission on Hazardous Goods, which addresses and defines criteria for issues related to hazardous cargo handling, and it is a member of the Environmental Advisory Technical Group of the CIP-OAS and the American Association of Port Authorities (AAPA).

Identification of stakeholders and their needs, expectations and engagement

Fig. 13 represents those members of the Port Community who are dedicated to environmental aspects. The structure they form resembles a network of connections which, although brief, represent the interwoven tapestry of interactions generated by port activity.

The Port of Montevideo brings together maritime, port, customs and municipal authorities, those related to sanitary barriers for humans, animals and vegetables, as well as natural and environmental resources, with the port commercial activity carried out by the private sector: (export, import, transit, movement of passengers, etc.); that operates in specific services at the docks and also in terminals and warehouses, and all this is coordinated with society, trying to maintain an optimal relationship between the city and the port.

Environmental objectives, actions and projects

We think it is possible to achieve a sustainable development where vessel, cargo and passenger port services, as well as new infrastructure construction works, coexist. All of them are necessary and crucial so that the Port of Montevideo becomes a strong link in the trading chain of the country and the region.

The Port of Montevideo manages its operations and services through its port operators and terminals in line with its environmental policy, which is reviewed and adjusted as appropriate. These operations and services are the objectives of the port and, as mentioned before, many of them involve environmental aspects that need to be managed in order to reduce or, if possible, prevent any environmental impacts related thereto.

As an example of the actions taken, there are protocols in place regarding solid waste from ships, sewage and bilge water removal services, and the management and final disposal thereof are monitored.

Port management of hazardous cargo involves controlling and checking the cargo manifests of each ship, recording the findings in an official document called “Hazardous cargo statement”, before arrival in Montevideo, and, among other actions, inspecting them in order to find any irregularities in stowage, segregation or possible spills for the purpose of adopting the corresponding mitigation measures.

Due to the fact that the port development projects are located on the coastline, an Environmental Impact Assessment (EIA) is required, as well as the corresponding Prior Environmental Authorization application (initial stage of works) and the Environmental Authorization for Operation when operations start.

These Environmental Impact Assessments are created based on the information of executive projects and construction managers, as well as data directly obtained from official sources and studies carried out by the Environmental Management Unit or commissioned under agreements with UdelaR.

Studies commissioned under agreements with UdelaR provide relevant scientific and technical information for new port development projects (inputs for the EIA and other requirements set forth in the legislation in force) and for the improvement of port environmental management as a whole. These inputs are sediment samplings for sediment toxicology analysis, geotechnical and hydrodynamic studies, etc.

Documents of the Environmental Management System (SGA), as well as the environmental aspects, are reviewed and updated on a regular basis, including when amendments are made to the applicable legislation or regulations. Said system (SGA) also has financial, human and material resources available for achieving environmental goals, acting by itself and in cooperation with other agencies, universities or consulting firms hired for such purpose.

ANP, through the Environmental Management Unit, maintains close ties with other national and international organizations, government and municipal agencies, and port operators in order to coordinate actions and streamline management aimed at complying with national and international regulations, thus improving the processes and approach to new challenges related to port environmental aspects.

Based on the data related to environmental aspects of the operations and services (statistics, inspections, sampling, reports, etc.) and from studies commissioned under agreements, environmental performance indices are created. Said indices are set forth in this document and will be used as reference for subsequent reviews, in order to assess the improvements in management, and for further certifications.

Compliance Review Table										
Results of Environmental Policy Action Plans							Measurable goals		Conclusions on the policy outcomes of the past two years and recommendations for the coming years.	Conclusions on the political plans for 2025-2026
N°	Significant environmental aspect	Environmental impact/problem	Port Policy	Measure taken	Responsible actor	performance indicator	2023	2024		
1	**Infrastructure Works**	Relevant environmental aspects in the area of influence of the port infrastructure of the projects	Control environmental pollution from different port operations	Manage all corresponding authorizations before the Ministry of Environment of Uruguay	General Manager, National Port System Area Manager and Infrastructure Area Manager	Number of procedures carried out at the Ministry of Environment	**3**	**3**	The objective has been met, with all necessary permits obtained from the Ministry of the Environment.	The objective has been successfully met and is intended to be maintained for the next two years.
2	**Ship bilge water removal services**	Water, soil, biodiversity, public health or visual pollution.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (Tons) managed	**3824**	**3465**	All requests for vessels in port have been met.	It is considered that sufficient experience has been acquired to study the expansion of the bilge water reception service for vessels operating offshore.
3	**Solid waste removal services from ships**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) Managed	**2118**	**2060**	All requests for vessels in port have been met.	The goal is to improve solid waste management in order to increase waste recovery (recycling). Possible alternatives during collection to facilitate management are being studied.
4	**Grey and black water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (m3) managed.	**2971**	**4624**	All requests for vessels in port have been met.	The Ministry of the Environment is reviewing Decree 253/79, which contains water quality parameters, at the request of delegates from the CEGAP (National Water Commission) as a way to optimize this service.
5	**Handling of Dangerous Cargo**	Pollution to water, soil, biodiversity, public health or visual health.	Environmental care and application of international and national regulations	Inspections of terminals and intraport warehouses	General Manager, National Port System Area Manager.	Inspections carried out.	**573**	**297**	The objective is met.	The objective has been successfully met and is intended to be maintained for the next two years.

6	**Stakeholder participation in environmental issues at the Port of Montevideo**	All environmental impacts/problems	Development of areas of participation (CEGAP - Port Coordinator)	Number of meetings per year	National Port System Area Manager and Operations Manager	Number of Meetings	**42**	**41**	The objective is met.	CEGAP meetings have been increased, incorporating a monthly environmental meeting in addition to those already held by the sub-coordinator.
7	**Quality of dredged material and its disposal (*)**	Pollution of the seabed or body of water	Compliance with international and national standards	Sediment sampling and analysis in external laboratories	Head of Environment and Environmental Representative Professional	Number of Meetings	**316**	**9**	The objective of evaluating the dredged material prior to carrying out opening dredging works is met.	The objective has been successfully met, and it is intended to remain the same for the next two years.
8	**Ship operations, cranes, port equipment. (*)**	Generation of greenhouse gases	Adopt and implement measures to minimize environmental impacts in port operations	Changing equipment or vehicles to hybrid or electric systems	Terminal managers and/or port operators	Quantity of vehicles or equipment purchased	**0**	**12**	The greenhouse gas reduction target is met through the adaptation of hybrid or electric equipment.	The objective has been successfully met, and it is intended to remain the same for the next two years.

(*) The quality of the dredged material is assessed in opening dredging, not maintenance dredging.

Expediente 23094 - (Zona de giro TCP - 52 muestras de sedimento (39 superficiales y 13 a profundiad de -1m)
Expediente 231210- Canal de acceso a -14m- 65 puntos de cateo - 264 muestras

The documents submitted have the technical endorsement of:

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7. BEST PRACTICES (Section 1.6 of PERS)

7.1 Ship Scrapping

Port of:	Montevideo – Republic of Uruguay
Contact person:	Mr. Federico Piñeiro Chem. Grad. Lorena Leal Chem. Eng. Gianfranco Ferraro
Position:	Environmental Management Unit manager and professional staff of the Unit
E-mail:	gestionambiental@anp.com.uy
Environmental issue:	6 – Conservation Areas 12 – Garbage/Port Waste 14 – Habitat/Ecosystem Loss (Water) 21 – River Pollution 23 – Port Development (Water-Related) 24 – Sediment Pollution (Marine) 29 – Ship Debris 32 – Relationship with the Local Community 34 – Water Quality
Relevance to the 5 Es framework:	Exemplify, encourage and enforce

Ship Scrapping

With the goal of improving environmental and operational conditions at the Port of Montevideo, the ANP has been working since 2021 on a project to remove and scrap vessels abandoned in the capital's bay. This process goes hand in hand with the modernization of port operations and the implementation of new infrastructure that will radically change traffic at the country's main port.

Pursuant to Decree No. 61/2018, it was decided to proceed with the scrapping and management of scrap and debris generated by vessels declared abandoned and located in the port area and under the jurisdiction of the ANP, as they constitute a serious and risky impact on port operations and safety. This action contributes to achieving a cleaner port.

Currently, the ANP has Contract No. 2049 (2021) that contemplates the scrapping of 28 vessels, 19 of which have already been completed. The general work plan includes the scrapping of the vessel on site or its lightening and refloating for subsequent transfer to the Port of Punta Sayago, an authorized location for the fractionation of cut vessels. It is worth noting that the TSAKOS Dock, which had collapsed within the port in 2022, was scrapped this year.

The benefits achieved with the removal of these vessels from the port and the bay have included the elimination of obstacles and hazards to navigation, with a consequent increase in operational areas in anchorage zones. Access to these areas and areas where port expansion works are underway have also been cleared, as has a substantial improvement in the bay's image, fostering the concept of a clean port.

7.2 Disposal of material from the UPM – Puerto Montevideo train project for use in filling areas.

Port of:	Montevideo – República Oriental del Uruguay
Contact person:	Mr. Federico Piñeiro Chem. Grad. Lorena Leal Chem. Eng. Gianfranco Ferraro
Position:	Environmental Management Unit manager and professional staff of the Unit
E-mail:	gestionambiental@anp.com.uy
Environmental issue:	22 – Port development (land-related) 32 – Relationship with the local community
Relevance to the 5 Es framework:	Exemplifies and encourages

Disposal of material from the UPM – Puerto Montevideo train project for use in filling areas.

During the 2022-2023 period, construction work was carried out on the railway tracks connecting the Port of Montevideo with the UPM plant in Paso de los Toros. This project generated a large volume of earth and debris, which were removed to lay the tracks and build the necessary infrastructure.
Since all this material was waste to be managed for the railway project, it was decided, as a best practice, to use it as fill for the Capurro Port project. This allowed it to be transformed and reused as a useful input for the project, promoting reuse and reducing the consumption of material resources during the port construction.
In total, 30,000 m3 of fill from the railway project were used at Capurro Port, equivalent to approximately 1,500 truckloads of fill material.

8. REPORT ON ENVIRONMENTAL INDICATORS YEAR 2021 TO 2023.

Based on the assessment of the most significant environmental aspects to be monitored (page 50), the National Port Administration determined the main activities to be evaluated using indicators. Below, we analyze the results obtained from the indicators:
The detailed table below shows the environmental indicators selected by the National Port Administration for the years 2021 to 2023:

MANAGEMENT INDICATORS (IDGs)	
Environmental training	• No. of environmental trainings offered
Hazardous cargo	• No. of inspections / Containers* • Nonconformities / Inspections * Containers with hazardous cargo
OPERATIONAL INDICATORS (IDOs)	
Hazardous cargo	• Incidents

Discharge of sewage from ships. MARPOL IV	• m^3 or tonnes
Discharge of solid waste from ships. MARPOL V	• m^3 or tonnes
Bilge water discharge. MARPOL I	• m^3 or tonnes
Maintenance dredging	• m^3 of maintenance dredging
Initial dredging	• m^3 of initial dredging • m^3 of beneficial use of dredged material / total m^3 of initial dredging
Electrical power	kW/h
Used office paper	Kg of paper collected for recycling Number of supplies delivered to public schools
ENVIRONMENTAL INDICATORS (ICAs)	
Physical and chemical quality of water at commercial docks	• Temperature °C • Conductivity $mS.cm^{-1}$ • Salinity ppt • Turbidity $g.L^{-1}$ - NTU • Dissolved oxygen $mg.L^{-1}$ • pH $[H^+]$

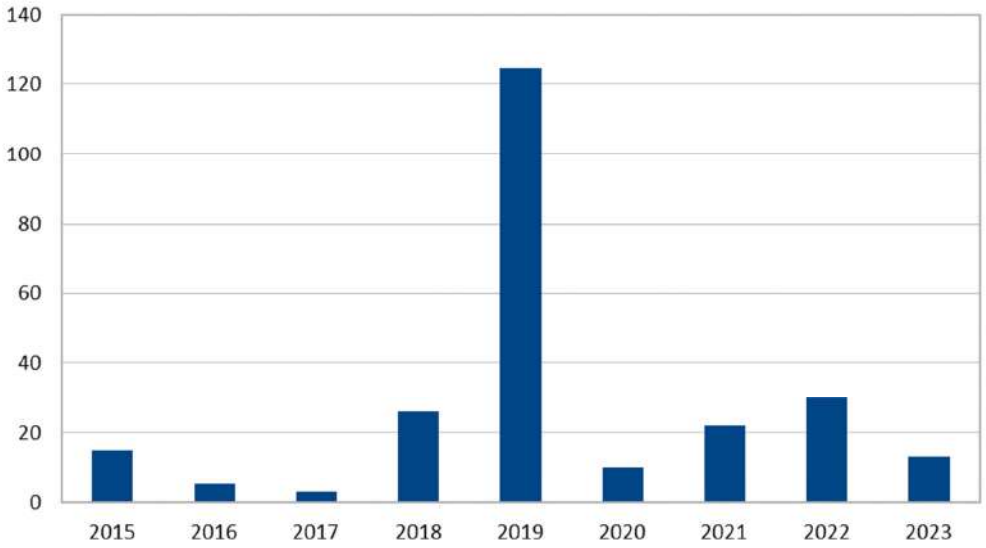
(**) Annual indicators

MANAGEMENT INDICATORS

1- Staff Training

In accordance with the guidelines of the Environmental Policy and related to those Environmental Aspects that have impacts, the Port of Montevideo trains its personnel in both pre-employment induction and its other staff. It also maintains communication channels that allow for the dissemination of critical environmental issues and how to cooperate in mitigating them. Among the training courses related to the organization's Environmental Aspects are courses on Dangerous Cargo (IMO IMDG Code - Maritime Provision No. 146), Port Induction with an emphasis on port Environmental Management, and training in Environmental Management Systems taught by the Uruguayan Institute of Technical Standards (UNIT).

Year	Employees with environmental training
2015	15
2016	5
2017	3
2018	26
2019	125
2020	10
2021	22
2022	30
2023	13



It should be noted that the training provided in 2021 and 2022 was solely for Port Induction, while in 2023, the training of 13 employees corresponded to 7 employees trained through Port Induction, one employee trained in Environmental Quality and Sustainable Development, one employee trained in Noise Control and 4 employees trained through a Workshop on the safe handling of Hazardous Chemical Substances.

2- Dangerous Cargoes (IMDG-IMO Code) and Environmental Inspections

Dangerous cargo is inspected once it is unloaded and stowed in container terminals or intraport warehouses. These controls involve proper segregation and identification of the cargo. Control is also carried out in accordance with Decree No. 183/994, a power of the Montevideo Port Authority. This regulation establishes conditions for the storage, stowage, and segregation of dangerous cargo, both in terminals and intraport warehouses.

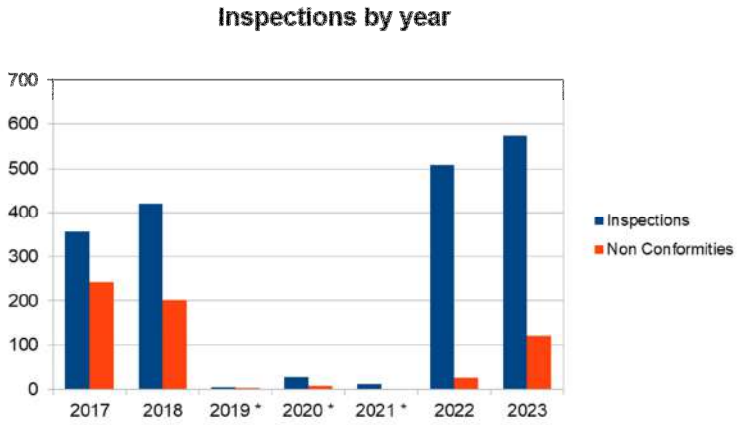
In 2022, the UGMA prepared and updated a Port Security and Dangerous Cargo Manual (IMDG-OMI) for the Port of Montevideo. The latest version of this document is available on the institution's website. https://www.anp.com.uy/sites/default/files/archivos/parrafo-colapsable/2022-01/Manual%20de%20Seguridad%20Portuaria%20y%20Cargas%20Peligrosas-19%20de%20enero%20de%202022.pdf

These controls aim to prevent risks associated with this type of cargo, and those dispatched directly (Mandatory Direct Clearance – DDO) fulfill a stricter preventive function due to the close relationship between the City and the Port that surrounds and encompasses us. In addition, inspections are carried out in container storage areas at Terminals and deconsolidated cargo stored in Warehouses, monitoring stowage segregation, labeling, container conditions, and possible spills or leaks.

Environmental inspections are also carried out, some of them assisted by the Ministry of the Environment (the highest authority in our country on environmental matters) to verify compliance with the various current regulations.

Year	Inspections	Non Conformities
2016	460	130
2017	356	243
2018	420	202
2019 *	5	2
2020 *	28	9
2021 *	12	0
2022	507	26
2023	573	120

*** Note:** The period between 2019 and 2021 was affected by the global COVID-19 pandemic.



OPERATIONAL INDICATORS

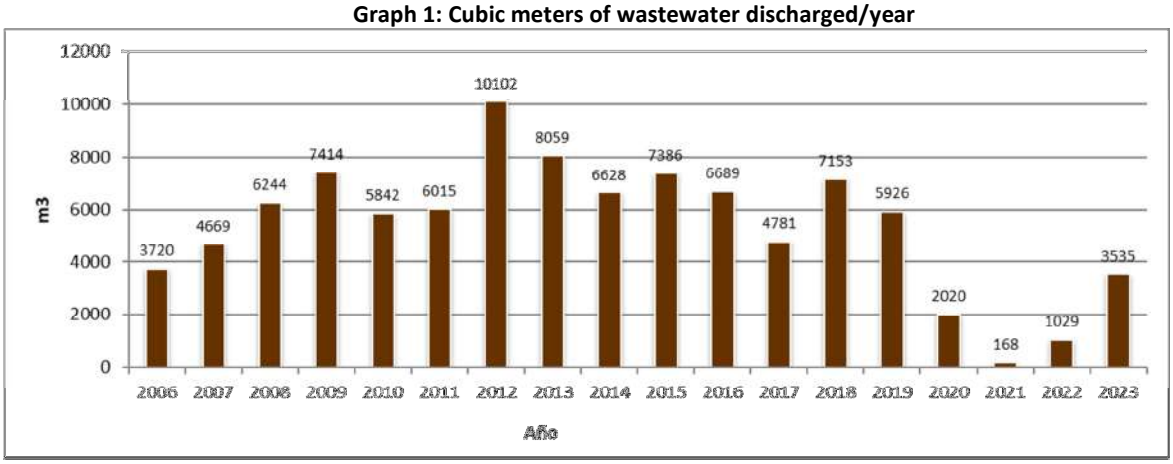
3- Incidents with Hazardous Cargo

No incidents were recorded involving hazardous cargo transported in packages (containers, among others) or in bulk during the various operational processes (loading, unloading, removal, etc.).

4- Discharge of Sewage from Ships. MARPOL IV

In keeping with the guidelines of the Environmental Policy and in compliance with the international agreements approved by our Parliament, in this case the Maritime Pollution Convention (MARPOL 73/74), MARPOL IV Grey and Black Waters have been discharged since 2002, during which a period of testing and changes was carried out that ultimately led to the direct connection of the vessels to the sanitation network of the City of Montevideo.

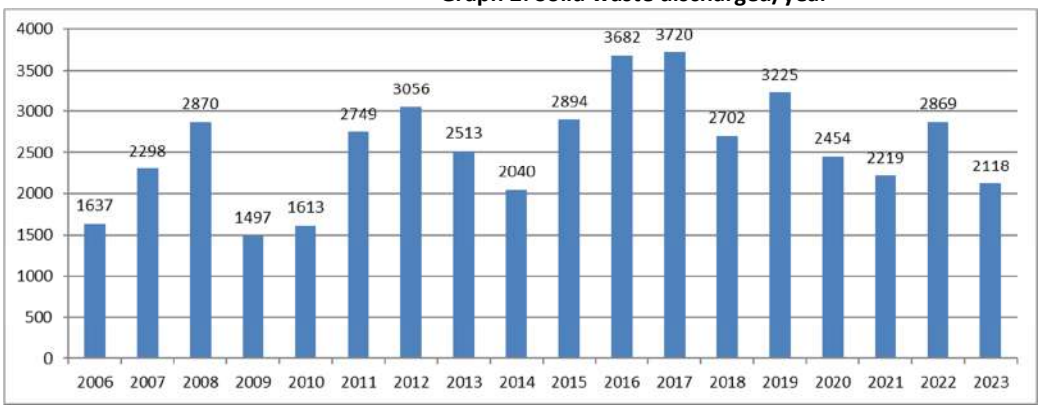
Graph 1: Cubic meters of wastewater discharged/year



5- Discharge of Solid Waste from Ships. MARPOL V

The indicators for solid waste discharge from ships referred to in this section are based exclusively on waste originating overseas, meaning that its provisioning takes place in other countries and therefore may pose a health risk, particularly those with an organic composition. Until September 2021, the latter was managed following the procedure described below: prior to shipment, organic waste was placed in dumpsters and covered with layers of lime (calcium carbonate) and then transferred to a landfill. However, as of September 2021, a new Resolution of the Ministry of the Environment (No. 1238/2021) came into force, establishing the mandatory management of the final disposal of organic waste of foreign origin through incineration or autoclave methods, in order to eliminate potential biological risks. Solid waste from nationally flagged vessels provisioned in the country (Uruguay) is considered and treated as household solid waste because its risk is known.

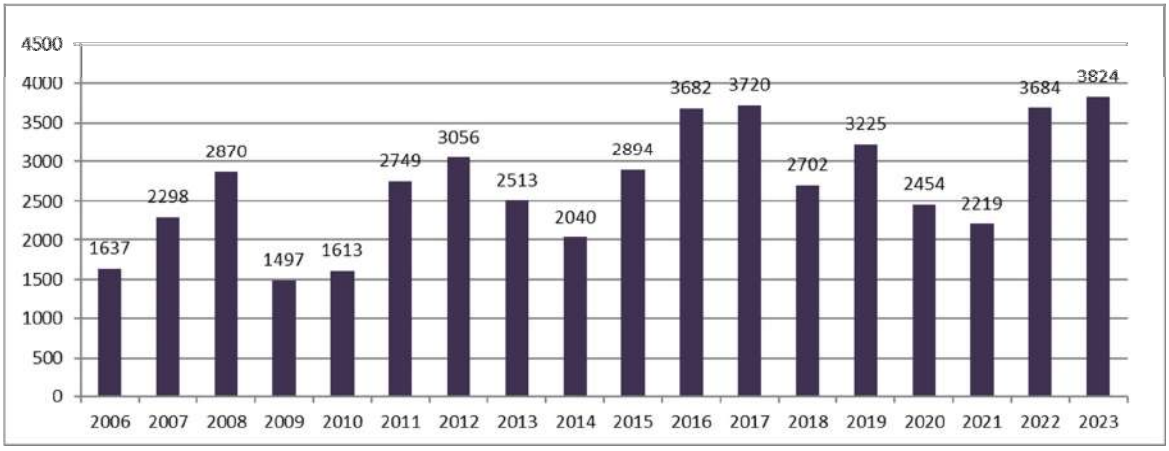
Graph 2: Solid waste discharged/year



6- Discharge of Bilge Water from ships (MARPOL I)

The Port of Montevideo receives bilge water from ships, which is unloaded into tanker trucks and transported to a treatment plant that separates the oily fraction (FOAS) from the water. The latter is treated in treatment lagoons until it reaches the levels required by the Water Code (Decree No. 253/979) for disposal into waterways, while the oily fraction is sent to Portland cement production plants for use as secondary fuel. Other operators separate the FOAS by centrifuge and heat it until it reaches a value that meets regulations.

Graph 3: Tons of bilge water discharged/year



7- Dredging

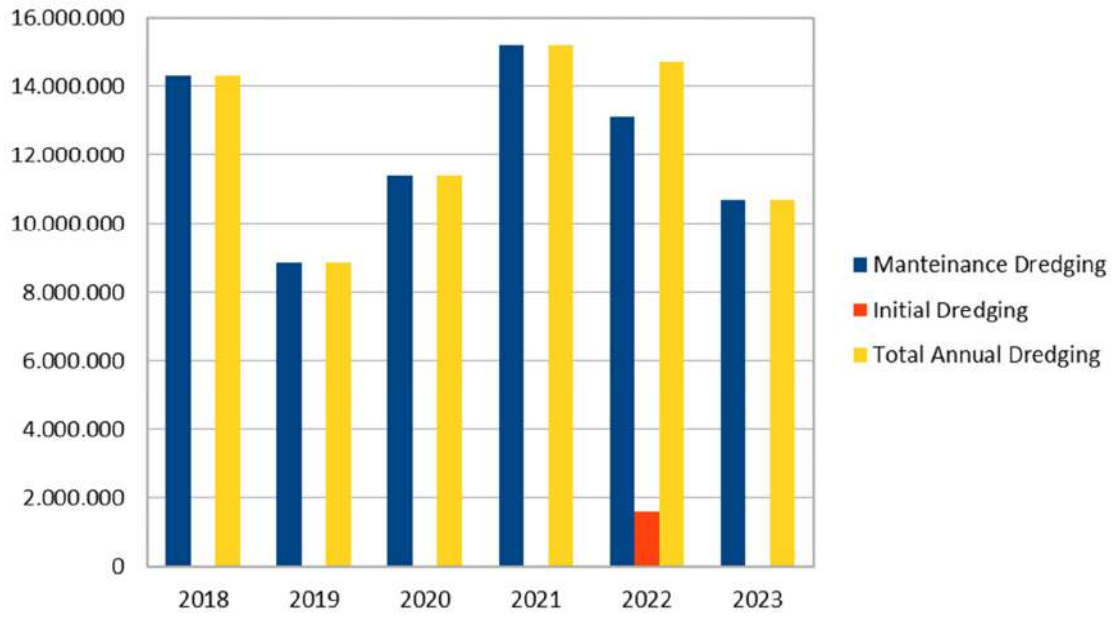
One of the main responsibilities of the National Port Administration, through the Fleet and Dredging Department, is to regularly dredge basins and channels. This dredging is considered maintenance work and has specific disposal sites. Likewise, dredging for opening port infrastructure projects requires Environmental Authorization from DINACEA, and the dredged material is disposed of in accordance with international standards after being characterized.

During 2021, within the framework of the institutional project known as "Puerto de Capurro," the ANP implemented a new method of beneficially managing dredged material. For this purpose, the material extracted in the area during deepening works was disposed of in geotextiles, generating flocculated sludge for use in fillings and foundations for the works.

Dredging type/year	2018	2019	2020	2021	2022	2023
Manteinance Dredging	14.319.578	8.884.480	11.390.590	15.224.055	13.135.275	10.713.708
Initial Dredging	0	0	0	0	1.605.000	0
Total Annual Dredging	14.319.578	8.884.480	11.390.590	15.224.055	14.740.275	10.713.708

* Volumes correspond to transported m^3

Graph 4: Cubic meters of dredged material/year



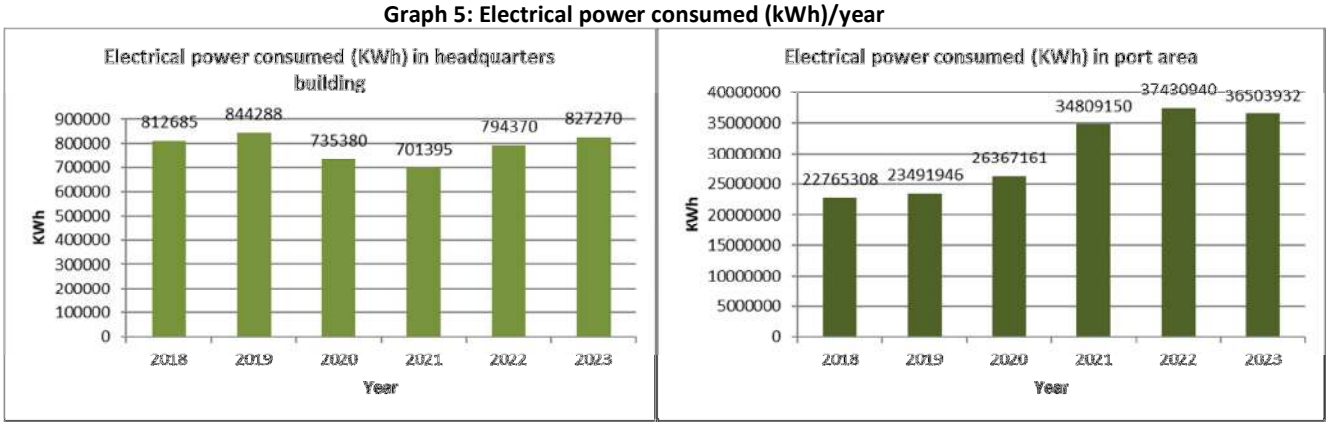
8- Electrical Power Consumption

ANP, through the Networks Unit of the Infrastructure Area, has a network of substations available to supply electrical power taken from the national network and distributed to the port area with different voltages, amperages and powers, depending on the requirements.

It also records the consumption of several areas granted under concession agreements and other relevant State facilities within the port operational area to which energy is supplied.

Electrical power consumed (kWh)						
Year	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**
Headquarters building	812685	844288	735380	701395	794370	827270
Port area	22765308	23491946	26367161	34809150	37430940	36503932

Graph 5: Electrical power consumed (kWh)/year



It is also important to highlight that there have been changes to the energy grid, introducing the use of more environmentally friendly energy sources. Some examples of these improvements include:

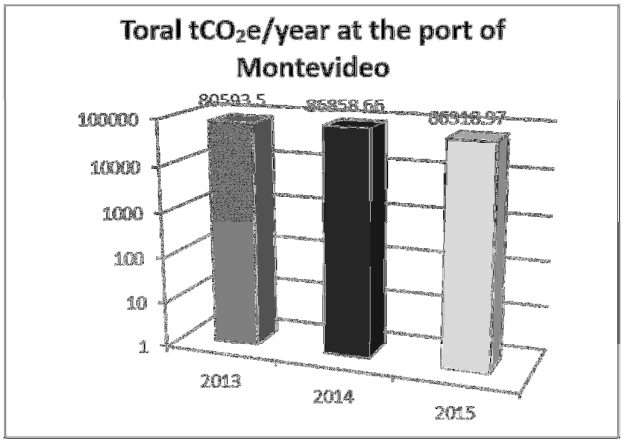
I. Replacement of split air conditioning units at the Port of Montevideo's River and Maritime Terminal with more energy-efficient VRV systems incorporating environmentally friendly refrigerants - 2021.
II. Replacement of 400 high-pressure sodium lights with LED technology at the Port of Montevideo's passenger terminal - 2023.
We highlight that this National Port Administration obtained renewable energy certificates issued by the state-owned utility, Power Plants and Electric Transmissions (UTE), under the Ministry of Industry, Energy, and Mining, for the years 2021, 2022, and 2023. These certificates are presented as Annexes (Annex B).

9- This indicator was measured through a study carried out under an agreement with the University of the Republic (Faculty of Engineering - Institute of Physics) where different emission sources were identified: vehicle circulation both within and outside the port area, ships, port machinery, oil refinery of the State-owned oil company (ANCAP), “Jose Batlle y Ordoñez” thermal power plant that belongs to the State-owned electrical power company (UTE), which became a back-up plant when the energy mix of the country changed and, therefore, there are random emissions from oil combustion depending on the electrical power demand.

The carbon footprint value is a baseline value. The possibility of having equipment with fixed sensors in the future, to record the values for a continuous monitoring and, among other measures, designing related projects in order to reduce said value, is being considered.

Carbon footprint measurement studies were not carried on during the years 2019-2020, as a consequence of the pandemic situation of COVID-19 at a national level. This reduced the research studies dependent on the University of the Republic together with this Port Administration, since the renewal of the agreement between said university and this Port Administration is pending and the formalities have been delayed as a result of the administrative processes affected by the health situation of the country.

Years	CO_2	NO_2	CH_4	Total tCO_2e
2013	79455.99	1117.97	19.54	80593.5
2014	65632.72	1204.87	21.06	86858.66
2015	65382.94	919.96	16.08	66318.97



	2015	2016	2017	2018
Port ships	1.1	0.9	1.1	1.3
Offshore ships (1)	90.7	93.3	105.3	144.9
Total, Criterion 1	91.8	94.1	106.4	146.2
Offshore ships (2)	66.2	73.8	82.3	128.9
Total, Criterion 2	67.2	74.6	83.4	130.2
Total (Average)	**79.5** ± 15%	**84.4** ± 15%	**94.9** ± 12%	**138.2** ± 6%

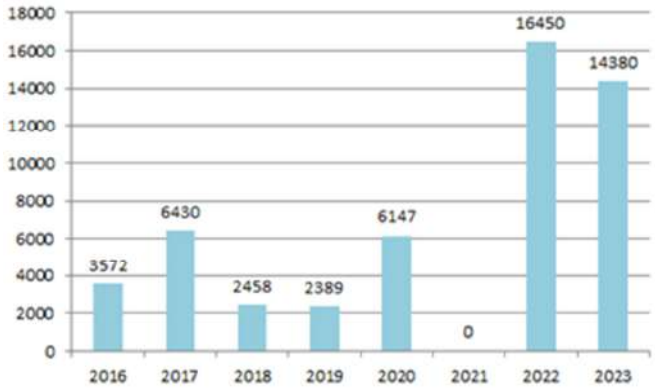
Table 24.- Annual emissions for ships in hotelling mode in kton of CO2 equivalent, according to the adopted criteria. The final average value represents the real emissions.

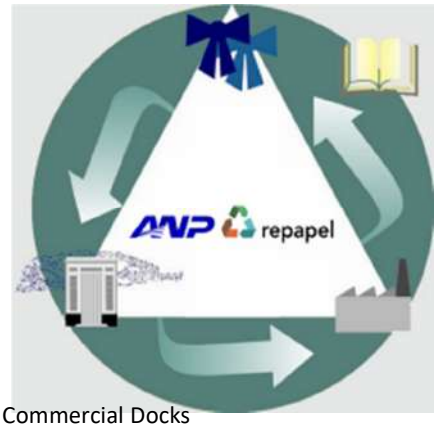
9- Office Paper Recycling

All ANP's employees collect waste paper from the offices that is then used as raw material for the REPAPEL Project, which involves the development of the environmental education project, talks, workshops and the delivery of school supplies made of recycled paper to public schools, thus supporting public schools located in the area surrounding the Montevideo Bay. Besides being an environmental and educational project, this is a Corporate Social Responsibility (RSE) action.

Fig. 9 - Day of delivery of school supplies to public schools.

Year	2016	2017	2018	2019	2020	2021	2022	2023
Paper (Kg)	3572	6430	2458	2389	6147	0	16450	14380





10- Physical and Chemical Quality - Water at Commercial Docks

Since 2010, the National Ports Administration performs a monthly monitoring of the water quality of the commercial docks of the Port of Montevideo. For this purpose, a multiparameter probe is used, which measures a variety of physical and chemical parameters, such as the following:

- Temperature (℃)
- Conductivity (µS/cm)
- Salinity (ppt) or (%) o (gl-1)
- TDS (mg/L)
- DO Concentration (mg/L)
- PH

In 2021, the National Ports Administration purchased a new multiparameter probe "IN- Situ Aqua TROLL 500".
The Aqua TROLL 500 is a fully customizable multiparametric probe with interchangeable sensors and a smartphone interface that provides accurate data and enables simplified calibration, panoramic data display and reporting.
This new tool enabled the incorporation of new sensors which will help this port administration to monitor new indicators, such as:

- Chlorophyll a
- Fluorescein WT

The results obtained from the analysis of the data are the following:

- The water quality of the commercial docks during the 2021-2023 season was optimal for the activities carried out, based on the data collected on physical and chemical parameters. Likewise, the variation in all physical and chemical parameters over the years has remained stable throughout the various summer seasons. This has demonstrated that, despite the wide variety of infrastructure projects carried out at the Port of Montevideo during the years 2010-2023, water quality based on the physical and chemical parameters monitored monthly did not show significant variations.

- Dissolved oxygen is considered a relevant indicator of water quality. The data obtained indicate that its concentration decreased during the summer months, which may be associated with rising temperatures, but its average value was within the expected concentration..

8.2 Upcoming Studies

From the previously conducted evaluation of environmental indicators, the need arises to further investigate the studies associated with dredging. For this reason, the ANP is currently in the process of contracting for the following environmental studies:
I- Sedimentation Study of the Access Channel to the Port of Montevideo – IMFIA – Faculty of Engineering – ANP.
II- Study of the Agitation in Dock A Due to the Widening of the "Freu A" – IMFIA – Faculty of Engineering – ANP.
Currently, the ANP is in the process of signing an agreement with the University of the Republic (UDELAR) to gain access to all faculties within the public education system, thereby expanding the contracting possibilities for environmental studies.

8.3 Main environmental aspects and regulatory compliance

Among the main environmental aspects that may generate environmental impacts due to their significance are those associated with port development projects. The environmental regulations governing these projects are Decree No. 349/005, Regulations on Environmental Impact Assessment and Environmental Authorizations (Law

No. 16,466). This regulation has been fully complied with, with all the required environmental authorizations and Environmental Impact Studies for the infrastructure works carried out in the Port of Montevideo being processed.

Regarding dredged material, as there are no national regulations for sediment toxicology, the 2017 Guidelines for the Characterization of Dredged Material and its Relocation in Public Maritime-Terrestrial Waters of the Interministerial Commission on Marine Strategies of the Government of Spain have been used as a reference.
Regarding environmental aspects associated with vessel operations (solid waste, bilge water, and sewage), the company has complied with national and international regulations. These regulations are Decree No. 182/2013 (Solid Waste Management Plan) and the international maritime convention MARPOL 73/78 (ratified by Law No. 14885/79). All environmental authorizations have also been obtained, using waste management systems authorized by the Ministry of the Environment.

Regarding the discharge of gray and black (sewage) water into the sewer and for monitoring the water quality of Montevideo Bay, the company has complied with the provisions of Decree No. 253/79 (Water Codes).

Table 1 - Policy and indicators

Results of Environmental Policy action plans							Measurable goals	
N°	Significant environmental aspect	Environmental impact/problem	Port Policy	Measure taken	Responsible actor	Performance indicator	2023	2024
1	**Infrastructure Works**	Relevant environmental aspects in the area of influence of the port infrastructure works	Control environmental pollution from different port operations	Manage all corresponding permits before the Ministry of Environment of Uruguay	General Manager, National Port System Area Manager and Infrastructure Area Manager	Number of procedures carried out at the Ministry of Environment	**3**	**3**
2	**Ship bilge water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) managed	**3824**	**3465**
3	**Solid waste removal services from ships**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantities (Tons) managed	**2118**	**2060**

4	**Grey and black water removal services**	Pollution to water, soil, biodiversity, public health or visual health.	Control environmental pollution from various port operations and comply with international and national regulations.	Appropriate final disposal of waste/compliance with the MARPOL Convention and national regulations	General Manager, National Port System Area Manager and Operations Area Manager	Quantity (m3 managed).	**2971**	**4624**
5	**Handling of Dangerous Cargo**	Pollution to water, soil, biodiversity, public health or visual health.	Environmental care and application of international and national regulations	Inspections of terminals and intraport warehouses	General Manager, National Port System Area Manager.	Number of inspections performed.	**573**	**297**
6	**Stakeholder engagement in environmental issues at the Port of Montevideo**	All environmental impacts/problems	Development of areas of participation (CEGAP - Port Coordinator)	Number of meetings per year	National Port System Area Manager and Operations Manager	Number of Meetings	**42**	**41**
7	**Quality of dredged material and its disposal**	Pollution of the seabed or body of water	Compliance with international and national standards	Sediment sampling and analysis in external laboratories.	Head of Environment and Environmental Representative Professional	Number of Samples	**316**	**0**
8	**Ship operations, cranes, and port equipment. (*)**	Generation of greenhouse gases	Adopt and implement measures to minimize environmental impacts in port operations	Changing equipment or vehicles to hybrid or electric systems	Terminal managers and/or port operators	Quantity of vehicles or equipment purchased	**0**	**12**

ANNEX

DEFINITIONS

EGP- Process management team
MTOP- Ministry of Transport and Public Works
ANP- National Ports Administration
UGMA- Environmental Management Unit
CEGAP- Port Environmental Management Executive Committee
PNN- National Naval Prefecture
MVOTMA- Ministry of Housing, Land Planning and Environment
DINAMA- National Environmental Authority
DINOT- National Directorate of Land Planning
IM- Municipality of Montevideo
POT- Land use planning
UNIT- Uruguayan Institute of Technical Standards
CENNAVE- Navigation Center
EIA- Environmental Impact Assessment
AAP- Prior Environmental Authorization
AAO- Environmental Authorization for Operation
VAL- Environmental Viability of the Location
DDO- Mandatory Direct Dispatch
NC- Nonconformities
SEA- Strategic Environmental Assessment
ekPis - Environmental Key Performance Indicators
IDAs- Environmental Performance Indicators

Guyer& Regules

Date: Montevideo, July 16th, 2025

Declaration

The undersigned, attorneys of law in Guyer & Regules, have controlled the overview of legal Requirements in the PERS report of the Port of Montevideo and declares that the contents are related with the applicable laws and regulations.

This declaration applies to the ECOSLC's EcoPorts Certification only and was made based on the information provided by the Port of Montevideo.

Signature

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