



## ENVIRONMENTAL DECLARATION

**Production site: Strada Turchino 30 Novi Ligure (AL)**

**Three-year period 2025 – 2028**

***All data included in this Declaration was updated on 30<sup>th</sup> June 2025***



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Environmental Declaration is available at ITP offices and on the website:

[www.internationaltinplate.com](http://www.internationaltinplate.com)

## REFERENCES

This document belongs to ITP and it has been issued spontaneously by using the structure regulated by Emas as a model.

The purpose of the Declaration is to communicate from ITP to its own Stakeholders:

- Aspects and environmental impacts
- Environmental performance
- Improving goals

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	<b>1. INTRODUCTION</b>	

With the present we are issuing the Environmental Declaration starting from the Initial Environmental Analysis (Analisi Ambientale Iniziale - AAI) by INTERNATIONAL TIN PLATE to establish the environmental impact of our company.

Environmental Declaration describes the environmental management system of INTERNATIONAL TIN PLATE S.R.L. applicable to all activities, products and services considering all possible interactions with the environment during ordinary working conditions, unusual conditions and potential emergency. This is being periodically updated in relation to the change of context and aspects, impacts and environmental performance.

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<b>2. COMPANY INTRODUCTION</b>		

## 2.1 COMPANY INTRODUCTION

The company International Tin Plate Srl, registered office:

Novi Ligure Strada del Turchino 30 and commercial site in Novi Ligure Strada Turchino 30, deals with processing of products / supplies the following services:

- Marketing of steel products, especially tin plate, chrome plate and black plate.
- Own account and third-party processing of the materials above.

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The productive site covers an indoor area of approx. 10.000 sqm and an open-air area of approx. 8000 sqm. Entirely company property.

Approx. 4000 sqm of the outdoor area is a green area.

The company was initially established in 1980 for steel products marketing (especially tin plate, chrome plate and black plate) then from 1994 it expanded the production of the above materials.

Thanks to the starting of the slitting line, the company became a Service Centre for own account and third-party production.

In 2003, the expansion of the operative site was completed, two new warehouses were built, and two new slitting lines were added.

From 2020 until today, the plant expanded further with the acquisition of nearby warehouse areas.

The machines are constantly updated for quality, security and environment-safe purposes.

	<b>2. COMPANY INTRODUCTION</b>
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ITP production consists in purchasing tin plate coils and cutting material into sheets, that will be processed by factories that make tin boxes.

The material is cut into sheets thanks to the slitting lines, that unroll the coils and cut the plate according to the measurement setting and thanks to a baler, completing the cutting process.

Sometimes the material is purchased directly in sheets that can be cut or trimmed. If required, they can be cut to measure by using a cutter or with rotary knives.

There is another activity that the company runs alongside marketing activities: material processing for third parties (coils cutting).

Working activities are divided into 2 daytime shifts and employers use the following machines:

- 3 slitting lines
- 2 manual cutters
- 1 automatic cutter
- 2 steamrollers
- 1 coil turning machine
- 2 sheets turning machine
- 7 electric forklift trucks

The sale of the material is directed mainly to internal market.

The product is mostly designed for box factories (for food, aerosols, enamel paint, etc.) and to produce crown caps.

The production process is constantly monitored and checked by following the quality standards according to ISO 9001, with the particular attention to environmental impacts, using management schemes of ISO 14001. The respect of health and safety at work is followed according to ISO 45001 rules.

The company follows the customer in every project ensuring skilled work and consolidated efficiency.

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	<b>COMPANY INTRODUCTION</b>	

**INTERNATIONAL TIN PLATE IS CERTIFIED ACCORDING TO THE INTERNATIONAL STANDARDS:**

- ⌚ UNI EN ISO 9001
- ⌚ UNI EN ISO 14001
- ⌚ UNI ISO 45001



**ISO 9001 regulation.** Management scheme for quality: it refers to what a management system requires for the enterprise quality.

ITP plans, acts, monitors and improves both operational and supportive process, planning and implementing the quality management system to reach goals. The customer satisfaction is key in ISO 9001;

**ISO 14001 regulation:** international certifying regulation for Environmental Management System (Sistemi di Gestione Ambientale - SGA), it sets the requirements for the enterprises to defying and improve their own environmental performances and manage the impacts.

It is not mandatory to get an ISO 14001 certification, ITP purposely decided to establish/activate/keep active/improve its own environmental management system. With the ISO 14001 certification, ITP wants to prove its valid management system that can control the environmental impacts of the activities, and it systematically searches improvement with coherency, efficiency and mainly sustainability.

**ISO 45001 regulation:** "Health and Safety at work is an international regulation that specifies which requirements a Health and Safety management system has to own. ITP decided to adopt this regulation, to give its enterprise a safe and healthy workplace and to prevent work-related accidents and health issues, proactively improving SSL.

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	<b>COMPANY INTRODUCTION</b>	

## ***2.2 ENVIRONMENTAL, HEALTH AND SAFETY INTEGRATED POLICY***

The policy “Quality, Environment and Safety” by International Tin Plate establishes the base of maintenance and constant improvement of its own internal management system, according to standards UNI EN ISO 9001 and UNI EN ISO 14001 and UNI ISO 45001

ITP intention is to commit to the environmental quality and safety, according to the following principles and goals:

- Satisfying well defined marketing needs, based on customer’s expectations while respecting the environment and reducing as much as possible the environmental impacts.
- Leading the process by respecting current legal regulations.
- Providing products/services featuring customer’s satisfaction.
- Introducing and maintaining goal-oriented inputs, towards dynamic goals and continuous improvement.
- Promoting flexibility to satisfy customer’s needs.
- Keeping in contact with customers to understand their needs to achieve customer’s loyalty.
- Evaluating the climate change impacts on business activities.
- Pursuing continuous improvement of the environmental performances by reducing the impact on climate change, especially referring to:
  - o Emissions control
  - o Reducing direct and indirect pollution
  - o Reducing energy and water resources waste
  - o Reducing plastic usage
  - o Using the correct special waste management and reducing general waste
  - o Preferring suppliers that support the sustainable development.
- Reducing environmental impacts generated by the business activities and production, especially by checking usage of energy resources usage and waste.
- Involving and rising awareness among suppliers concerning the importance of environmental aspects / safety expressed by the present policy.
- Perform periodically maintenance along constant renewing and maintaining infrastructures.

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- Managing the business activities by preventing accidents, work-related injuries and occupational illnesses and with focusing on constant improving in health and safety.
- Managing working environments, operating methods and organisational aspects to protect employees' health, third parties, company assets and the community where the business operates.
- Every employee must be informed and aware on risks at workplace, on activities of their own competence, on the responsibilities connected to the fulfilment of the activities and on the duty of checking and monitoring inside the integrated Management System.
- The whole company structure needs to participate to the pursuing of the given goals, according to its own skills and responsibilities.
- Cooperation among the different business functions must be promoted. Employees must be involved and participate in managing safety at work, also through RLS.
- Improving goals must be spread and shared among all corporate levels.

The Direction is committed to inform about the present Policy to all the individuals concerned and to periodically verify its execution.

The present Declaration is fully available in order share the awareness between institutions, public and private ones. It is constantly examined and updated to match with real effects coming from institutional activities and with targets and goals that are periodically established.

## 2. COMPANY INTRODUCTION

### 2.3 ORGANISATION CHART

#### Direction

#### Administration

1 Manager  
5 Operators

#### Purchase office

1 Manager  
1 Operator

#### Sales office

1 Manager  
1 Operator

#### Environmental quality and safety manager

1 SGQA Manager

#### Safety

- R.S.P.P. 1
- R.L.S. 1
- Fire marshal 6
- First Aid marshal 2
- Appointed Manager 2

#### Warehouse and deliveries

1 Line Manager  
1 Appointed manager  
3 Operators

#### Production

1 Line Manager  
1 Appointed manager  
11 Operators

#### Maintenance

1 Line Manager  
1 Operator

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<b>3. SITE CLASSIFICATION</b>		

### 3.1 ENVIRONMENTAL CONTEXT

The area of the Council of Novi Ligure is in the south-east of the Province of Alessandria and shares the border with the Councils of: Basaluzzo, Bosco Marengo, Cassano Spinola, Gavi, Pasturana, Pozzolo Formigaro, Serravalle Scrivia, Tassarolo and Villalvernia. It is situated in the south-west of Alto Monferrato (Basso Piemonte), in the historical area of Oltregiogo, on the left side of Valle Scrivia. The populated area is in the northern foothills of the mountains Appennino Ligure. Here is where the hills start to become gently rounded, most of them host vineyards while the remaining part is mainly woods. The council area features hills at the back of the historical town centre and the nearby boroughs. The alluvial plain ends by the river Scrivia. It covers a surface of 54,22 sqm, the heights go from 150m to 350m above sea level., including also the villages of Barbellotta and Merella.

It is an important industrial and commercial area, where many steel, metallurgical and mechanical industries are based: moreover, it is also known to produce food, sweets and wine. It is one of the sites where Gavi wine or Cortese di Gavi wine is produced, taking also part of the Associazione Nazionale Città del Vino (National Association City of Wine).

Speaking of infrastructures, Novi Ligure has a railway station, located in the town centre. In San Bovo area there is a logistic railway site, known as railway park of Novi San Bovo (it includes a designated station, built in 1885 it was called "il parco dei vagoni", the "park of carriages"). From the town starts Strada Statale 211 della Lomellina, a main road, that connects Novi to Novara. The road Strada Statale 35 bis dei Giovi runs around the town centre, connecting Novi to Alessandria northbound, and Serravalle Scrivia southbound. The road "SS35 Ter" was built due to intense traffic towards Serravalle. Novi is well connected to the other towns thanks to a motorway, of which entrance is situated on junction A26-A7: Novi's geographical location is ideal, as it lies in the middle of the industrial triangle of the cities of Turin - Genoa - Milan, ensuring quick connections to three of the main cities of North-western Italy and Liguria region.

The Council of Novi Ligure uses Piano Regolatore Generale (General Regulation Plan) drafted according to titolo III della L.R. 56/77 e s.m.i. approved with D.G.R. n. 48-1721 of 19/11/1990, lately integrated and amended by different variants.

The air quality of the Council of Novi Ligure is constantly monitored thanks to a station (Piazza Gobetti) run by ARPA of Alessandria, that detects concentrations in the atmosphere of polluting agents (CO, NO, NO2, SO2, PM10).

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The integrated water service is run by Gestione Acqua SpA (Provider of SII ATO 6) which provides water services, drains and water purification services.

The plant of ITP produces ordinary sewages (office services) and it is connected to public drain for the old warehouse, while for the new one (built in 2003), office sewages are contained into a watertight trench that needs to be periodically emptied (according to ARPA n. 1515 del 11/11/2002).

The management of waste recycling is run by the Council of Novi Ligure and the enterprise Gestione Ambiente srl (contract for city public hygiene, environmental decontaminations and waste disposal).

The Council of Novi Ligure uses an acoustic zoning approved by L. 447/95 (DCC n. 20 of 15/05/2002) and related Council Regulation for noisy activities (DCC n. 47 del 29/09/05, edited with DCC n. 30/11/09).

The council of Novi Ligure is categorised as seismic zone 2

SEISMIC ZONE	DESCRIPTION
Zone 1	It is the most dangerous zone. Strong earthquakes can happen.
Zone 2	In this zone there could be strong earthquakes
Zone 3	In this zone strong but rare earthquakes can happen
Zone 4	This is the less dangerous zone

The Council of Novi Ligure is in climate zone E

CLIMATE ZONE	DEGREES (C°) - DAY	PERIOD	N. OF HOURS
A	Council with GG $\leq$ 600	1/12 – 15/03	6
B	Council with GG $\geq$ 600 $\leq$ 900	1/12 – 31/03	8
C	Council with GG $\geq$ 900 $\leq$ 1400	15/11 – 31/03	10
D	Council with GG $\geq$ 1400 $\leq$ 2100	1/11 – 15/04	12
E	Council with GG $\geq$ 2100 $\leq$ 3000	15/10 – 15/04	14
F	Council with GG $\geq$ 3000	All-year-long	No limits

In the surroundings where ITP plant is located there are no public parks, protects species of animals or trees and plants; there are no touristic areas neither.

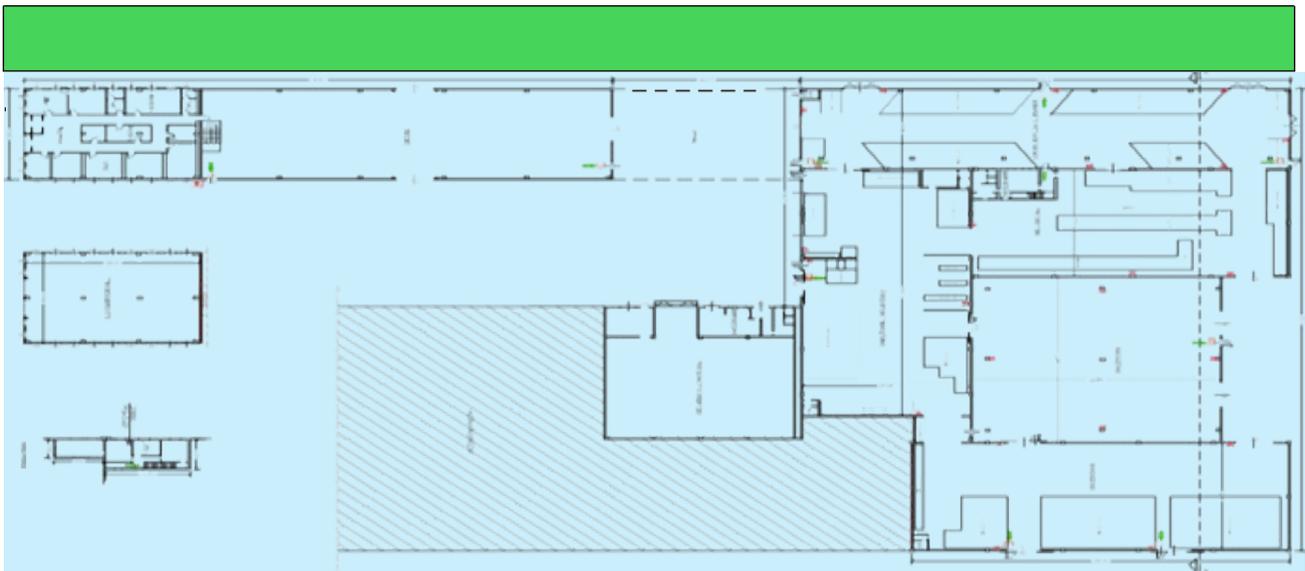
There are no SIC (Sites of community interest) or ZPS (Special protection Zones):

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<b>3. SITE CLASSIFICATION</b>		

### 3.2 ORGANISATIONAL AREAS

The enterprise activities are divided into the following zones:

- **Office Area:** it includes 7 offices, and it is located on the ground floor of what is known as warehouse 6, where commercial activities take place.
- **Unload Area:** service area covered by a shed located in between warehouse 6 and 5, where the external trucks unload and load operations take place by using forklifts.
- **Productive Area:** The main productive area is situated in the warehouse called “1”, where there are 3 slitting lines and 1 coil turning machine. Some other production areas are in the warehouse called “2”, where the manual selection area and 2 sheets turning machines are. Other areas are partially used for production, and they are in the warehouse called “3”, where there are 3 sheets cutters. Another productive area is in the warehouse called “4”, where there is a table saw with suction system, used to prepare pallets.
- **Warehouse Area:** Warehouse areas for raw materials. They are in the warehouses called 2, 3, 5, 6, 7, 8.
- **External Areas:** They feature entrance and exit corridors for trucks, 2 parking areas, 3 service areas between warehouses, 1 outdoor area for non-hazardous waste, 1 sheltered area for hazardous waste disposal. 1 property green area dedicated to gardening nearby warehouses.



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	<b>4. CONTEXT, AREAS CONCERNED AND ENVIRONMENTAL MANAGEMENT SYSTEM</b>	page 14 of 36

Here following a chart with elements of context, areas concerned and related hazard evaluation / opportunity given to build an environmental management system by International Tin Plate

FIELD	FACTOR	CONCERNED PARTS	OPPORTUNITY HAZARD	ACTION
Cultural/Social	Staff needed	Workers Citizenship	Vacancies on local area	Collaboration with job agencies for hiring, internships and scholarships
Regulatory/Legal	Legal framework mandatory regulatory and voluntary applicable	Employees Direction Trade Unions RLS Customers	Failing to respect the regulations and legal prescription, compliance obligation	Keeping non-defaulted monitored through the monitoring procedures expected in the legal prescription chart. Monitoring Plan
Regulatory/Legal	Legal framework mandatory regulatory and voluntary applicable	Direction. Employees Trade Unions RLS Customers	Employees' health and safety not guaranteed  Sanctions risk	Keeping DVR updated. Continuous monitoring of regulatory compliance. Monitoring plan of training and updating employees' learning process.
Technologic	Technologic innovation of the market concerned	Employees/ Trade Unions Direction	Increase of productivity thanks to new machinery	Ensure continuous updating of the machines to the new technologies
Technologic	Technologic innovation of the market concerned	Employees/Trade Unions Direction	Increase of safety level of the machines and reduction of accident risk.	Continuous maintenance of equipment. Guarantee effective plans of maintenance. Reduction of accident risk by increasing the capability of prediction and analyse situation or behaviour at risk /Near miss
Competitive	Presence of competitors and their commercial policy	Direction Competitor	Increase customer number thanks to cooperative policy with competitors	Monitoring the possibility to increase productive capability to grab market shares that competitors want to drop. Monitoring the possibility to increase the service offering by adapting the lines to new technologies that allow to perform new types of cutting.

**4. CONTEXT, AREAS CONCERNED AND ENVIRONMENTAL MANAGEMENT SYSTEM**

FIELD	FACTOR	CONCERNED PARTS	OPPORTUNITY HAZARD	ACTION
Human Resources	Involvement and awareness	Employees Trade Unions	Absence Involvement	Keeping employees involved through regular meetings about topics concerning quality - environment and safety. Schedule individual meetings to improve the communication about working, personal and expectative issues.
Human resources	Involvement and awareness	Employees Trade Unions	Improving workers involvement in environmental and safety issues.	Keeping employees involved through regular meetings about topics concerning quality - environment and safety Keeping employees involved on managing the topics about safety referring to the annual survey; Near Miss management.
Infrastructures	Business strategic lines	Direction Employees	Reduction of the accident hazard linked to the availability of space and to the condition of the infrastructure.	Continuous maintenance of the structure. Identification of the possibility to obtain new reduced environmental impact areas. Constant improvement of workplaces security in relation to the different steps of production.
Information Systems	Legal framework	Workers / Trade Unions Customers Suppliers	Risk of sanctions regarding processing of sensitive data. Data leak after malware or computer crash or external cyber-attacks.	Keeping computer systems updated to guarantee: Data safety Data privacy Data integrity Data availability
Environmental Climate change	Hydrogeological risk	Employees/ Trade Unions RLS Local community	Increasing risk of heavy and unexpected rain with flooding	Scheduling monitoring and maintenance of ditches and drainage system and manholes. Storing material safely.
Environmental Climate change	CO2 emissions and particulate for indoor heating.	Employees/ Trade Unions RLS Local community	Risk of overtaking the emission limit in the atmosphere	Keeping atmosphere emissions monitored. Regular checking and maintenance of boilers. Regular updates of facilities and infrastructures

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	<b>4. CONTEXT, AREAS CONCERNED AND ENVIRONMENTAL MANAGEMENT SYSTEM</b> <b>5. IDENTIFICATION, RELEVANCE AND EVALUATION OF ENVIRONMENTAL ASPECTS</b>	

FIELD	FACTOR	CONCERNED PARTS	OPPORTUNITY HAZARD	ACTION
Environmental Climate change	Acoustic emissions	Local community Local authorities	Risk of overtaking legal limits	ITP productive framework is recorded as class V (mainly for industrial areas) in the acoustic zoning of Novi Ligure. ITP tested environmental noises in 2011 and in 2019, after the expansion of the plant. In 2022, ITP tested noises and vibrations inside the plant. Performing a new test of environmental noise levels related to productive activity every time work and infrastructure condition change.
Environmental Climate change	Greenhouse gas emissions	Local community Local authorities	Risk of overtaking legal limits	Keeping energy efficiency of cooling/heating pump monitored and the potential greenhouse gas leaks.
Environmental Climate change	Energy consumption Fuels	Local community Staff Direction	Environmental impact due to high power consumption from non-renewable sources	Keeping power efficiency monitored. Own production of power from renewable sources
Environmental Climate change	Emissions in atmosphere (indirect)	Local community Staff Outsourcing	Environmental impact of exhaust gases from trucks	Use of low-emissions transport for long distances (railway, natural gas). Evaluation of emission class of the means of transport employed. Evaluation of the possibility to compensate CO2 emissions from transport.
Environmental Climate change	Waste generation	Local Community Customers Suppliers Local authorities	Opportunity to reduce waste from packaging	Reducing packaging waste by: - R e - u s i n g -packaging saving -recycling waste purchasing low environmental impact packaging - Environmental label

In order to evaluate the relationship between the enterprise and the environment correctly, it is necessary to perform a complete identification of all the environmental aspects within the business.

Identification is performed under the following operative conditions:

- Ordinary (everyday activities)
- Exceptional (machines start and stop for maintenance)
- Emergency (e.g. fire, oil leaks indoor or outdoor, etc.)

Environmental aspects, direct and indirect, identified in the multiple operative conditions, must be noted on “Registro degli Aspetti e degli Impatti Ambientali” (Record of Aspects and environmental impacts) (All. PGA 01 01).

Where there are non-remarkable or exceptional events that require an emergency operation, GSQA provides yearly to review “Registro degli Aspetti e degli Impatti Ambientali”. This process must consider possible legal requirements and company environmental aspects changes, including internal monitoring and audit.

The outcome of this activity must be noted on the re-examination of environmental system record and updated if anything changes.

Once indirect and direct environmental aspects have been detected, connected to the business activities, it is necessary to identify the related environmental impact and assess it where possible.

According to the regulation, the aspect that could have an impact on the environment is considered a remarkable aspect, therefore it is necessary to identify which environmental impacts are also remarkable.

Such evaluation is performed based on the enterprise chosen standards, being aware of the different operative conditions.

The enterprise considers the remarkable environmental aspects while assessing, operating and maintaining active its management system.

The less or the more relevance of the different environmental aspects is generally linked to considerations about internal and external evaluation standards, that can be connected to the following factors:

- Intensity of the environmental impact (direct and indirect)
- Environmental sensitivity (direct and indirect aspects)
- Adequacy of technologies (direct aspects)
- Impact intensity on climate change
- Level of management (direct aspects)

The evaluation of the environmental aspects, based on standards adopted, has given the following results, generally considered with low or medium relevancy:

**5 IDENTIFICATION, RELEVANCE AND EVALUATION OF ENVIRONMENTAL ASPECTS**

**5.1 Direct Aspects**

Connected activities and/or services	Environmental aspect	Operative conditions	Environmental impact	Evaluation					relevancy	Standards/ indicators
				Affected by regulation	Local sensitivity	Technological aspect	intensity	Climate change		
Goods loading/unloading	Waste generation from spillage	Exceptional	Fuel spillage /oils/acids batteries unloading area	●	●				<b>medium</b>	Accidents/ near miss
Goods loading/unloading	Acoustic emissions and vibrations	Ordinary Exceptional Emergency	Overtaking noise limit environment circumstances						<b>low</b>	Environmental noise test
Unpacking coils/sheets	Waste generation	Ordinary	Non-hazardous waste disposal (packaging)	●			●	●	<b>Medium</b>	Tons of mixed packaging
Production	In-air emissions	Ordinary Exceptional Emergency	Dispersion of heating pollutants in air	●	●	●		●	<b>low</b>	Boiler follow-up chart CO2 emissions Raw materials usage
Production	In-air emissions	Ordinary Exceptional Emergency	Dispersion of wooden dust in air	●	●	●			<b>low</b>	Eventual relevant authorities' inspection
Production	Power and gas consumption	Ordinary Exceptional Emergency	Natural resources consumption				●		<b>low</b>	KW used Cubic meters of gas used CO2 emissions Raw materials usage
Production	Waste generation	Ordinary Exceptional Emergency	Non-hazardous waste disposal iron, wooden and paper packaging	●			●		<b>Medium</b>	Tons or iron packaging Tons of wooden packaging Tons of paper packaging
Production	Acoustic emissions and vibrations	Ordinary Exceptional Emergency	Overtaking noise limit	●	●				<b>low</b>	Noise test
Production	Presence of hazardous substances for the environment	Ordinary Exceptional	Waste generation of hazardous products	●	●				<b>low</b>	Accidents/ near miss
Packaging	Waste generation	Ordinary Exceptional	Natural resources consumptions				●	●	<b>Medium</b>	CO2 emissions Percentage of recyclable and recycled material Product life cycle

**5 IDENTIFICATION, RELEVANCE AND EVALUATION OF ENVIRONMENTAL ASPECTS**

Connected activities and/or services	Environmental aspect	Operative conditions	Environmental impact	Evaluation						Standards/ indicators
				Affected by regulation	Local sensitivity	Technological aspect	intensity	Climate change	relevancy	
Lab	Waste generation	Ordinary	Hazardous waste generation	●					low	Yearly water form lab
Lab	Presence of hazardous substances	Ordinary Exceptional	Acid spillage		●				low	Accidents / near miss
Maintenance	Power and gas consumption	Ordinary Exceptional	Consumption of natural resources				●		none	KW used Cubic metre of gas used
Maintenance	Waste generation	Ordinary Exceptional Emergency	Hazardous waste generation (waste oil – water compressors)	●			●	●	medium	Yearly Tons of hazardous waste generation
Maintenance	Presence of hazardous substances	Ordinary Exceptional Emergency	Dispersion of hazardous waste (oils)		●			●	low	Eventual relevant authorities' inspection
Office activity	In-air emissions	Ordinary Exceptional Emergency	Dispersion of heating pollutants in air	●			●		low	Boiler follow-up chart CO2 emissions Raw materials usage
Office activity	Emissions of greenhouse gas	Ordinary Exceptional Emergency	Greenhouse gas leaks from air conditioning system	●			●		medium	Boiler follow-up chart – maintenance outcome
Office activity	Water and drainage consumption	Ordinary Exceptional Emergency	Natural resources consumption Spillage on soil	●	●		●		low	Trench discharge follow up chart Cubic metre of water consumption
Office activity	Power and gas consumption	Ordinary Exceptional Emergency	Natural resources consumption				●		low	KW used Mc gas used
Office activity	Waste generation	Ordinary Exceptional Emergency	Generation of non-hazardous waste (paper- general waste)				●		low	Tons of mixed packaging

**5 IDENTIFICATION, RELEVANCE AND EVALUATION OF ENVIRONMENTAL ASPECTS**

**5.2 Indirect aspects**

Connected activities and/or services	Environmental aspect	Operative conditions	Environmental impact	Valutazione							Parametri/indicatori
				Affected by regulation	Local sensitivity	Technological aspect	intensity	Climate change	Controllo gestionale	relevancy	
Freight activity	In-air emissions	<b>Ordinary</b>	CO2 emissions		●		●	●	M	medium	Yearly percentage of train trips Conveyors environmental chart
Raw material purchase	In-air emissions Consumption of natural resources	<b>Ordinary</b>	CO2 emissions Minerals extraction	●	●		●	●	L	medium	Number of raw materials suppliers that own 14001 certificates
Environmental performance. Facilities Maintenance companies	Waste generation	<b>Exceptional</b>	Generation of hazardous waste	●	●				L	medium	Reports and complaints
Environmental performance waste collection companies	Waste generation	<b>Ordinary Exceptional Emergency</b>	Hazardous and non-hazardous collection and waste disposal		●			●		medium	authorisation and means follow-ups
Environmental performance cleaning companies	Raw material consumption Waste generation	<b>Ordinary</b>	Usage of hazardous products General waste generation		●					medium	authorisation and means follow-ups

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	<b>IDENTIFICATION, RELEVANCE AND EVALUATION OF ENVIRONMENTAL ASPECTS</b>	

### **5.3 PRODUCT LIFE CYCLE**

The tin plate (tin-plated stainless steel) has a reduced environmental impact compared to many other materials, especially thanks to its high recyclable features and to the employment of recycled material for its production. This allows to save energy and reduce pollution. The negative impact comes from the extraction of raw materials (iron and tin) that can cause destruction of habitats and release of toxins, in addition to the energy employed during production, coming mainly from fossil fuels. Tin plate is a permanent material, suitable for circular economy. The industry has improved its process to reduce emissions and chemical substances usage.

Production impact:

- **Raw materials extraction:**

The extraction of iron and tin, that are used to produce the tin plate, requires a process that destructs habitats and eco-systems.

- **Productive process:**

The factories that produce tin plate use energy and they can generate greenhouse gas, even if the employment of recycled materials reduces significantly the energy demand and the air pollution compared to the complete cycle of production.

Advantages of the tin plate:

- **High recyclability:**

The tin plate is a permanent material, and it has high recyclable features. This allows to reuse used containers and production scraps.

- **Energy consumption reduction:**

Stainless steel recycled for the production requires much less energy, followed up by less air pollution compared to the production of raw materials.

- **Circular economy:**

Tin is a permanent material and is naturally suitable for a circular economy model.

- **Process improvement:**

The industry has made progress by reducing green house gas emissions by removing the use of acids and oils during the process of pickling.

To sum up:

The tin plate has a significant environmental impact linked to the extraction of raw materials and to the energy used in production. However, its high recyclable features and its recycling efficiency make the tin plate a more sustainable choice, compared to other materials, mainly considering the continuous technological improvements to reduce environmental impact.

## 5.4 ENVIRONMENTAL LABEL

All of our products have an environmental chart (an example will follow) for a better understanding of how to dispose the goods at the end of their life cycle.



Subject: **PACKAGING ENVIRONMENTAL LABEL**

ITP declares the use of the following materials to pack and ship its own products, referring to the mandatory environmental labelling, regulated by 129/97/CE.

MATERIAL	REFERENCE	DESCRIPTION	DISPOSAL INSTRUCTIONS
Plastic straps	PET 1	Plastic	Recyclable waste – Verify Council instruction
Cardboard angles	PAP 21	Paper	Recyclable waste – verify Council instruction
Plastic angles	PP 5	Plastic	Recyclable waste – verify Council instruction
Wooden platform	FOR 50	Wood	Reusable platform Return to ITP or Recyclable waste – verify Council instruction
Extensible film	LDPE 4	Plastic	Recyclable waste – verify Council instruction
Protective cardboard	PAP 21	Paper	Recyclable waste – verify Council instruction
Identification label	PAP 22	Paper	Recyclable waste – verify Council instruction
Label badge	PAP 22 biobased	Paper	Compostable Recyclable waste – verify Council instruction

	<b>ENVIRONMENTAL DECLARATION</b>	<b>Section 6</b>
	<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS:</b>	<b>CONSUMPTIONS</b>

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ITP is aware that the optimisation of energy consumption guarantees economic savings and an advantage for the environment. The energy sources employed are electric power and natural gas.

### 6.1 ELECTRIC POWER

<p><b>In April 2022, ITP installed a solar power system to produce electricity which rated power is 80 kWp. The energy produced during the three-year period 2022-2025 covers an average of 73% of the plant needs.</b></p>	
<b>Energy produced</b>	<b>CO2 savings</b>
<b>378 MWh</b>	<b>201 Tons</b>

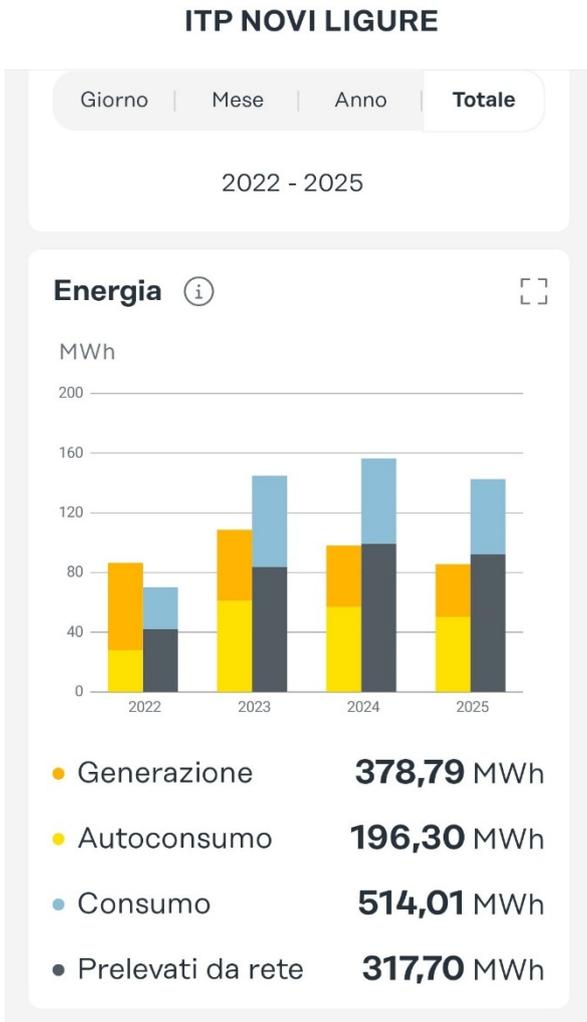
ITP uses electric power for office activities, production and moving goods with electric forklifts. Power is also used for air conditioning and heating inside the office areas. The data provided in the below chart resumes consumptions during the last few years.

IREN is the power provider that ITP uses for the remaining power needed. IREN guarantees a contract with a percentage of renewable energy. The power consumptions are constantly monitored thanks to the continuous awareness to employees from Direction.

<b>Communication related to National energy mix and to IREN MERCATO (pre-final data of 2023)</b>				
The below chart shows the result of calculation divided into sources and year, according to "articolo 8, comma 3, del DM 224 of 14 <sup>th</sup> July 2023"				
	Composition of energy mix per contract	Composition of energy mix used to produce power sold by IREN MERCATO	Composition of energy mix used to produce power pumped into the electric system	Composition of National complementary mix used to produce power pumped into the Italian electric system
<b>Primary sources used</b>	%	%	%	%
- Renewable sources	7.02	55.18	46.31	7.02
- Coal	18.96	9.14	5.27	18.96
- Natural gas	62.32	30.04	42.99	62.32
- Oil products	1.66	0.80	0.90	1.66
- Nuclear	2.99	1.44	0.00	2.99
-Other sources	7.05	7.40	4.53	7.05

<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: CONSUMPTIONS</b>	
	

**ITP's self-generated power**



**ITP's power consumptions**

Year	kW	kW/Ton
2010	117m	7,4
2011	128m	7,5
2012	135m	6,8
2013	157m	5,6
2014	182m	5,2
2015	166m	5,9
2016	162m	4,1
2017	186m	4,7
2018	170m	4,6
2019	186m	3,3
2020	188m	3,2
2021	205m	2,9
2022	125m	2,6
2023	144.m	1,5
2024	156m	<b>2.0</b>

ITP's power consumptions vary according to the amount of work and the scheduled working shifts, that can change during the year.

Fluctuations during the latest years are also due to the warehouse extension that has been in progress since 2018.

The best way to evaluate ITP energy efficiency is the relation between Kw and tons of the final product, which has been constantly going down during the latest years.

**6.2 NATURAL GAS FOR HEATING**

ITP uses 3 natural gas boilers for heating purposes for office and production sites.

Normally, the plant consumes 12,000 cubic metres per year.

The energy efficiency and smoke control is performed yearly by a qualified company with the issue of inspection reports.

**Boilers**

Type	KW	Position	Maintenance	Energy efficiency
Thermal power station	75	Offices – Changing rooms	Yearly	Yearly
Boilers	23	canteen	Yearly	Two-year
Thermal power station	115	Production	Yearly	Yearly
	115		Yearly	Yearly
	115		Yearly	Yearly

**Consumptions**

YEAR	Cubic metres	YEAR	Cubic metres
2018	17114	2022	12178
2019	14755	2023	7434
2020	8360	2024	12062
2021	15662	2025	

**6.3 WATER RESOURCES**

ITP supplies water form public water system through the managing company. ITP uses water for domestic purposes only; the data provided in the chart resumes water consumption, that

normally total up to 500 cubic metre per year. Consumption data is taken from the supplier invoices.

YEAR	CUBIC METRES	YEAR	CUBIC METRES
2018	17114	2022	12178
2019	14755	2023	7434
2020	8360	2024	12062
2021	15662	2025	

### 6.4 PACKAGING

ITP uses packaging such as platforms, cardboard, extensible film, cardboard and plastic angles for its products. ITP has subscribed to CONAI and the payments are regular.

In the below chart the composition of packaging

PRODUCT	% OF RECYCLED MATERIAL	% RECYCLABILITY
Wooden platform	100% (Only reusable platforms)	100% Reusable/wooden
Reggia in Pet	100%	100% Pet
Black angle in polythene	100%	100% LDPE04
Polythene film LLDPE	0%	100% LDPE04
Label badge envelopes	0%	100% Biodegradable
Interlayers	100%	100%
Gimo angles in pressed cardboard	80,91%	100% Pap 21

### 6.5 RAW MATERIALS

	<b>ENVIRONMENTAL DECLARATION</b>	<b>Section 7</b>
	<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: LIQUID WASTE, EMISSIONS, WASTE</b>	

The only material used by ITP is the tin plate (BSE). ITP only changes dimensions through cutting.

The tin plate (tin plated steel) has a reduced environmental impact compared to other materials, mainly thanks to its high recyclability and thanks to the recycled material used for production. This allows to remarkably save on energy and reduce pollution.

YEAR	Tons in European market	Tons in Extra-European market
2022	53715	6453
2023	27804	5795
2024	16264	13425
2025		

	<b>ENVIRONMENTAL DECLARATION</b>	<b>Section 7</b>
	<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: LIQUID WASTE, EMISSIONS, WASTE</b>	

### 7.1 LIQUID WASTE

The production activity doesn't generate industrial-type liquid waste. The waste is only about domestic type (toilets and showers).

A part of the water waste is disposed into the public drainage system; another part goes into a sealed trench that is being periodically emptied.

### 7.2 IN-AIR EMISSIONS

ITP's production activities generate in-air emissions from thermal plants used for heating purposes for offices and warehouses.

The above emissions are monitored through maintenance and emissions checks.

Implant booklets are provided, along with a step-by-step plan to help monitoring checks due to be done.

Ultimately, the emissions produced by load and unload activities are considered in indirect environmental aspects, as they are generated by third-party means.

Total green-house gas emissions of CO2 equal

YEAR	Natural gas Cubic metre	In-air CO2 tons
2022	12178	21,9 T
2023	7434	13,3 T
2024	12062	21,7 T
2025		

### 7.3 WASTE GENERATION

The below chart shows the waste type generated by ITP in 2024 and the management and disposal of it.

	ENVIRONMENTAL DECLARATION			
	CER code	Classification (dangerous/dangerous)	Quantity generated in 2024	Way of management / disposal currently in use
<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: LIQUID WASTE, EMISSIONS, WASTE</b>				
Metal packaging	15.01.04	Not dangerous	152 Ton	Disposed in a demountable container and collected by Roni srl company
Waste generated by mechanical processing of metals	12.01.99	Not dangerous	162 Ton	Disposed in a demountable container and collected by Roni srl company
Mineral oil waste for engines and mechanisms	13.02.05*	Dangerous	135 Kg	Disposed in barrels and collected by Grassano company
Lab water waste	07 05 01*	Dangerous	0	Disposed in barrels and collected by Grassano company
Steamroller steam discharge	13 08 02*	Dangerous	146 Kg	Disposed in barrels and collected by Grassano company
Cardboard and paper packaging	15 01 01	Not dangerous	22,5 Ton	Disposed in a demountable container and collected by Seval Casei company
Paper, cardboard and packaging made of cellulose	15 01 01	Not dangerous	N/A	Disposed in the council waste bins of "Gestione ambiente" collected weekly
Coils packaging and sheets in mixed materials	15.01.06	Not dangerous	41,3 Ton	Disposed in a demountable container and collected by Seval Casei company
Plastic packaging	15 01 02	Not dangerous	N/A	Disposed in the council waste bins of "Gestione ambiente" collected weekly
General waste	Included in urban waste	Not dangerous	N/A	Disposed in the council waste bins of "Gestione ambiente" collected weekly
Wooden waste	15.01.03	Not dangerous	59,6 Ton	Disposed in a demountable container and collected by Relife company

#### 7.4 EXTERNAL NOISE

Valutazione di Impatto Acustico (Evaluation of Acoustic impact) ai sensi della L. 447/1995 art. 8 commi 2 e 4 has been established.

According to the investigation of the Technician in Acustica Ambientale (Environmental noise), it has been assessed that the noise produced by machinery at work, while keeping the warehouse doors closed, is compatible with the regulations about acoustic pollution.

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	<b>ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: LIQUID WASTE, EMISSIONS, WASTE</b>	

### **7.5 VISUAL IMPACT**

ITP plant does not cause a visual impact in the environmental background, thanks to its position in the industrial area and the land around it.

### **7.6 TRAFFIC**

ITP is located in the industrial area of the Council of Novi Ligure, few kilometres away from the A7 motorway, Novi Ligure junction.

The traffic in the area is not particularly significant compared to the local context, thanks to the organisation of the production cycles, daily shipments and unloading process. Every shipment is operated by external companies.

### **7.7 ASBESTOS**

There is no asbestos in the old or neither in the new ITP plant building.

### **7.8 PCB e PCT**

ITP does not have in-site transformer stations, and it does not have oil processors for oils containing PCB-PCT.

### **7.9 POWER PLANTS**

The power plants installed in the plant comply with the regulations (norma CEI 64-8). The plant engineers have regularly released compliance statements.

There is also a grounding system, regularly checked every two years by an authorised technician. The building is considered self-protected thanks to the atmospheric discharge facility according to the regulation: CEI EN 62305 as found in technical reports.

## **7.10 USE OF SUBSTANCES DANGEROUS TO THE OZONE LAYER**

There is an air conditioning system to cool down the offices model Aermec containing gas R410A amounting to 13 kg.

The leakages test, according to regulations, is performed yearly and recorded on the portal F-GAS. According to the regulations, a plant manual is required.

## **7.11 EMERGENCIES**

During the initial environmental review, possible environmental emergencies had been identified for each area of the organisation.

The situations of environmental emergency connected to significant environmental aspects are being examined, prevention and emergency management are being evaluated in order to verify the need for further measures to prevent and to reduce the environmental impact that could follow.

A review of the possible environmental emergency situations is performed in case of a significant process change, facilities change, substances used, work procedures change and after situations of non-considered environmental emergencies.

A special emergency plan has been introduced to manage emergencies, and First Aid Marshal and Fire Marshal have been nominated.

Moreover, the lists of number to contact in case of emergency have been clearly placed inside the plant.

ITP identified various scenarios for environmental emergencies.

For each of them, it has identified the ways to contain them and the proper answers, to protect employees and everything concerned and to preserve the surrounding environment. Recorded emergency drills are performed yearly.



## ENVIRONMENTAL DECLARATION

**Section 7**

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### ASPECTS AND DIRECT ENVIRONMENTAL IMPACTS: LIQUID WASTE, EMISSIONS, WASTE

Emergencies		Preventive measures	Management measures	Regular drills	Environmental damage	Improvement activity
Fire	Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	<ul style="list-style-type: none"> <li>➤ Regular anti-fire checks (<i>Registro Antincendio – Anti-fire record</i>)</li> <li>➤ Wood quality test</li> <li>➤ Worker's training, especially fire marshals</li> </ul>	<ul style="list-style-type: none"> <li>➤ Emergency plan and evacuation</li> <li>➤ Company's health and safety regulations</li> </ul>	Yearly fire evacuation drill		Fire marshals work in shifts to ensure coverage. Improving extraction system and fire system
Acid leakage due to forklift's battery damage while charging	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>➤ Charging batteries only in specific areas</li> <li>➤ Presence of absorbing substances in the charging areas</li> <li>➤ Staff training</li> </ul>	<ul style="list-style-type: none"> <li>➤ Use of absorbing substances in the charging areas</li> <li>➤ Disposal according to health and safety rules</li> </ul>	Yearly drill With leakage of acid or diesel scenario		
Leakage due to special waste bins break	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>➤ Presence of absorbing substances in the stock areas</li> <li>➤ Stocking of bins on designated platforms to contain eventual leakages</li> <li>➤ Presence of instruction signs in the relevant areas</li> </ul>	<ul style="list-style-type: none"> <li>➤ Use of absorbing substances</li> <li>➤ Disposal according to health and safety rules</li> </ul>			
Leakage of diesel during load and unload operations	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>➤ Presence of absorbing substances in the stock areas</li> <li>➤ Presence of magnetic pads to close manholes</li> </ul>	<ul style="list-style-type: none"> <li>➤ Use of absorbing substances</li> <li>➤ Disposal according to health and safety rules</li> </ul>	Yearly drill With leakage of acid or diesel scenario		Adapting availability of magnetic pads and absorbing substances
Water leakage due to flood	Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>➤ Presence of bags and anti-flood barriers</li> <li>➤ Regular cleaning of drains and channels</li> </ul>	<ul style="list-style-type: none"> <li>➤ Emergency evacuation plan</li> <li>➤ Disposal of dangerous substances in raised tanks</li> </ul>			Increasing water exits Yearly checks of drainage efficiency



**ENVIRONMENTAL DECLARATION**

**Section 8**

**8. INDIRECT ENVIRONMENTAL ASPECTS AND IMPACTS**

Connected activities and/or services	Environmental aspect	Operative conditions	Environmental impact	Evaluation							Standards / indicators
				Subject to regulations	Local sensitivity	Technological aspect	Intensity	Climate change	Controllo gestionale	relevancy	
Freight activity	In-air emissions	Ordinary	CO2 emissions		●		●	●	M	medium	Yearly percentage of train trips. Conveyors environmental chart
Raw material purchase	In-air emissions Consumption of natural resources	Ordinary	CO2 emissions Minerals extraction	●	●		●	●	B	medium	Number of raw materials suppliers that own 14001 certificates
Environmental performance Maintenance companies	Waste generation	Exceptional	Generation of hazardous waste	●	●				B	low	Reports and complaints
Environmental performance waste disposal companies	Waste generation	Ordinary Exceptional Emergency	Hazardous and non-hazardous collection and waste disposal		●			●		medium	Authorisation and means follow-ups
Environmental performance cleaning companies	Raw materials consumptions Waste generation	Ordinary	Use of hazardous products. General waste generation		●					low	Health and Safety rules follow-ups

	<b>ENVIRONMENTAL DECLARATION</b> <del>ENVIRONMENTAL DECLARATION</del>	<b>Section 9</b>
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	<b>INDIRECT ENVIRONMENTAL ASPECTS AND IMPACTS:</b>	

The company developed policies that define the way to check incoming goods by the staff in charge, to ensure that suppliers respect the environmental objectives.

While updating the suppliers' list, ITP added environmental considerations in the evaluation chart. ITP's suppliers have a very high importance in the international industry, while ITP has a very low or zero management control on them.

The policy of maintaining the qualification is mostly linked to the presence of environmental certifications from the supplier.

In case that works on the company site are done by external companies or construction sites are opened, the contractor must implement on the executive project (or on the offer) with an analysis of the environmental aspects produced during the activity.

	<b>9. APPLICABLE REGULATORY REQUIREMENTS</b>
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The regulations, the laws and the agreements eventually set by the company with other organisations (ex. Trade Association) are shown on the system document “Elenco prescrizioni legali e conformità legislativa “(“List of legal prescription and legal compliance”).

ITP guarantees the constant identification and application of environmental rules applicable according to established modality recorded in the relevant management procedure.

To identify the above, ITP relies on Associazioni di Categoria e a Consulenti Esterni (Category Associations and External Consultants) and performs an AUDIT at least once a year. The legal requirements are listed on the document "Piano di monitoraggio" (“Monitoring Plan”) updated every six months.

The main Authorisations/Environmental laws that apply to ITP, are listed below:

- Testo Unico Ambientale D. Lgs.152/06 s.m.i e D.lgs 116/2020 del 26/09/2020;
- Testo Unico Per la salute e Sicurezza dei Lavoratori D. Lgs.81/08 s.m.i;
- Regolamento (UE) n.1907/2006 del 1/12/2006 (REACH);
- Regolamento (UE) 2020/878 “nuove prescrizioni compilazione SDS”;
- Decreto del 10 feb 2014, shows samples of the site manual and audit reports.
- D.lgs. n. 152 del 03/04/2006 e s.m.i. – Environmental regulations (Part 3 – Regulations about water protection from pollution and water resources management);
- D.lgs. n. 46 del 4/03/2014 – Application of directory 2010/75/UE related to Industrial emissions (prevention and reduction of pollution).
- DPR 15 feb 2006, n.147 – Policy about how to check and recover the leakage of substances harmful to the ozone from refrigeration devices and air conditioning, regulated by CEE/UE n° 2037 del 29/06/2000
- Legge n. 447 del 26/10/1995 – Acoustic pollution law.



## ENVIRONMENTAL DECLARATION

**Section 10**

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### 10. GOALS AND ENVIRONMENTAL PROGRAMS FOR IMPROVEMENT

**Year 2025/2026**

Project	Goal for improvement	Achievement	Program		Feedback on tasks carried out	RESULT
			means	by		
Waste	<b>% of general waste</b>  <b>&lt; 9%</b>	Improving the ability to separate packaging products during the coil unpacking process.	Engagement and awareness towards staff Increase of number of bins available Relocation of the area for coil unpacking and containers	December 2025	Staff meetings. Ask "gestione ambiente" to supply more waste bins. Change to the operation of coil unpacking.	<b>First staff meeting to increase awareness on the environmental topic. In progress, waiting for the end tunnel works</b>
		Increasing reusable packaging	Tell customers about the possibility to recycle part of ITP packaging for: - Wooden platforms - Plastic corners	June 2025	Communication to main customers. Supply of designated waste containers Customer feedback	<b>The project has been completed for all the main customers: Trivium - Emmeti – Metalcolor. Achieved good feedback</b>

Project	Goal for improvement	Achievement	Program		RESULT
			means	by	
Reducing consumptions related to heating and air conditioning	<b>Gas consumption</b>  <b>&lt; 12000 cubic metre</b>	Energy savings up to 30% Reduction of heat loss, efficiency improvement	Change of all the windows in the office area and in the new changing rooms	June 2025	<b>All the windows in the office area and in the new changing rooms have been replaced with new ones to ensure less heat loss.</b> <b>The boiler has been replaced with a better energy efficient one.</b> <b>All the air conditioning units have been replaced.</b>
			Boiler replacement	June 2025	
			Replacement of all the air conditioning in the office area and in the new changing rooms	June 2025	



**ENVIRONMENTAL DECLARATION**

**10. GOALS AND ENVIRONMENTAL PROGRAMS FOR IMPROVEMENT**

**Year 2025/2026**

Project	Goal for improvement	Achievement	Program		Feedback on tasks carried out	RESULT
			means	by		
Reducing the percentage of power consumption emissions	<b>Power consumption &lt;1.9kw/Ton</b>	Improving efficiency Energy saving up to 10%	Installation of a high energy efficiency boiler in the offices and changing rooms	June 2025	Project Installation	<b>New boiler installed and working in the offices and changing rooms</b>
			Roof replacement in the new warehouse to increase brightness	June 2025	Project Installation	
			Engine replacement in the slitting lines with a higher efficiency one	June 2025	Quotation Purchase Installation	<b>New warehouse roof replaced</b>  <b>Engine replaced in the slitting lines 1 and 2</b>
			Installation of self-closing solenoid valves in the compressed-air system to avoid leakages and self-start of non-operating machines	December 25	Quotation Purchase Installation	
			Inverter installation in the slitting lines to improve engine efficiency	December 25	Quotation Purchase Installation	
			Replacement of straighteners in forklifts with high frequency models	December 25	Quotation Purchase Installation	
			Replacement of neon lights with LED lights	December 25	Quotation Purchase Installation	