

Environmental Report 2020



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2 Company Information

Company name	Dominion Steelcon A/S Lillebæltvej 93 og 95 DK-6715 Esbjerg N Tel.: +45 75 14 20 22 Fax.: +45 75 14 01 22 E-Mail: dominion.steelcon@dominion-global.com Website: www.steelcon.com
Management	Henrik.Pedersen@dominion-global.com
Quality management	Lars.Bjerrum@dominion-global.com
Environmental contact person	Thomas.Rislov@dominion-global.com
Quality system	DS / ISO 9001-2015
Type of company	Limited company
CVR No.	66631613
P – No.	1003162975
Year of foundation	1981
Number of employees	Approx. 80
Branch	Iron- and steel industry, manufacturing of steel constructions and part of such constructions. NACE Code 281100.
Accounting period	1 st January to 31 st December 2020
Main activities	Manufacturing of free-standing steel chimneys, ducts and other circular steel structure.
Environmental approval	The Company has been approved by the authorities on October 12, 2005 acc. to chapter 5 of the Miljøbeskyttelsesloven (Danish Law of Environmental Protection). The company is included in the list point A205 of the departmental order concerning approval of companies, No.1640 dated December 13, 2006.
Waste water	From sanitary facilities only; no connection permit is required.
Risk assessment	The company is not included in any risk assessment.
Supervisory authority	External environment: Esbjerg Kommune, DK-6700 Esbjerg. Working environment: Arbejdstilsynet Tilsynscenter 3.

3. Managements statement

Environmental information

For the estimation of the environmental information included in this Environmental Report, the conditions of the environmental approval have been considered, and the Report will therefore include the most important influences on the environment in connection with Steelcon's production.

Environmental report and deviations from the previous years

This Environmental Report has been changes with new reference year and new baseline where turnover and Ton finish goods are considered in the Index no, due to that Steelcon A/S in 2009 made a second factory in Slovakia.

The present Environmental Report is the 12th official edition with Steelcon A/S and is valid for the calendar year 2020, and we have included figures from 2019, 2018, 2017, 2016, 2015, 2014, 2013, 2012, 2011, 2010, 2009, as well.

Our comments on any deviations have been included in the paragraphs and have been compared with the previous years. Compared to our previous Environmental Report 2019, there has been no considerable deviation of the environmental conditions.

In this report we have stated the key figures of all consumption, as index no, due to competition. The key figures have been calculated on the basis of year 2009 as the reference year. All figures vary from one year to the next due to the fact that we deliver different chimney diameters and – heights.

Collecting information

Consumption of raw materials and consumable supplies has been determined on the basis of our internal purchasing statistics, the invoiced amounts as well as information from suppliers. Therefore, deviations might occur compared to the exact yearly consumption. We do not consider this aspect important as the deviation is almost the same every year. The consumption of energy and water has been determined on the basis of our own readings compared with the invoices from the suppliers, and consequently, the figures are the real figures of the year.

Working environmental conditions

Dominion Steelcon A/S is continuously working on improvement of the working environment, and in order to improve the level we have registered with Avidenz who carry out one or two announced safety inspections per year and provide assistance if necessary.

Health damaging materials should be avoided in the production, and where it is not possible, the necessary precautions must be taken.

Employees' involvement

It is of great importance for Steelcon A/S to involve and inform the employees about as many things as possible, among others about the external and internal environmental work. It will promote the understanding and the interest to improve the individual effort and commitment towards the environment.

Involvement in the environment work is provided through OSH organizations. The other employees are informed through articles in Steelcon News (internal magazine), information on our notice boards, during monthly production meetings and also during quarterly briefings.

Demands to Sub-suppliers

We have demands to our sub-suppliers who carry out work for Steelcon on sites or in our workshops. We hand out a pamphlet to them instructing them to observe the Arbejdsmiljøloven (the Danish Working Environment Statutes) and Steelcon's safety instructions.

After we have achieved the ISO 9001 certification, all our suppliers of raw - and filler materials are approved according to the requirements of the ISO 9001 – among other requirements to quality control system and observance of the requirements and statutes of the authorities. The fact is that approx. half of our suppliers are either certified according to ISO14001 or EMAS, or they have their own environmental management system. We do not demand any specific environmental requirements from our suppliers. We will in 2021/2022 work towards a certification in EN 14001, in this context, we will see a changing in the way we categorize our suppliers.

Considerable complaints

Steelcon A/S has not received any considerable complaints.

Previous Environmental Report:

Last official edition of the Environmental Report was submitted in April 2019.

Next Environmental Report

The next official edition of the Environmental Report will be handed-in in February 2021.

Dominion Steelcon A/S
January-2020

Henrik Holm Pedersen
Managing Director

4. Environmental Policy

Steelcon's environmental policy includes the external- and working environment as well as safety.

Steelcon intends to be an environmentally conscious company and will therefore always prepare environmental- and safety improvements, and participate at the current discussions openly, actively and objectively.

Steelcon intends to be a safe place of work. The target is to achieve a safe, healthy and good working environment.

Environmental- and safety improvements will be implemented, if financially and technically possibly.

The safety policy includes the whole company and must be observed by each employee during his/her daily functions, tasks and actions.

Steelcon will on a continuing basis draw up new targets for future efforts to be made, and these efforts will be registered, and the results will be documented.

As a minimum Steelcon intend to observe the valid environmental- and safety legislation.

In accordance with Steelcon's targets and the management's attitude, we intend to:

- communicate openly with the public and the authorities about the influence of environment and safety risks due to the processes and products of the company,
- implement and continue the efforts of the energy-, environmental- and safety improvements,
- make sure that contractors working in Steelcon's workshop and our area outside the workshop or on behalf of Steelcon observe our demands to environment and safety.

By means of education and information, Steelcon motivates their employees, suppliers and customers to make improved environmental- and safety efforts.

5. Specification of the Production

Steelcon A/S is a company that manufactures orders such as:

- Factory made steel chimneys
- Ducting
- Other circular steel structure
- Silencers

The production is carried out in 2 different workshops which are divided in sections.

The main workshop is situated at Lillebæltsvej 93 and has a total space of 2543m² of which the 234m² are offices/cantinas and 103m² is the indoor storage. The workshop is mainly used for production with black steel.

The workshop has 4 overhead cranes of which the 2 ones have a lifting capacity of 20 tons and the 3rd one a lifting capacity of 10 tons. The lifting capacity of the 4th crane is 5 tons. Furthermore, there is machinery for:

Flame cutting, rolling, submerged arch welding, TIG-, MIG/MAG welding, drilling, plate cutting, sawing, grinding etc.

The other workshop is situated at Lillebæltsvej 95 and has a total space of 1218m² of which the 96m² are offices/cantinas and 45m² is storage. The workshop is mainly used for working with stainless steel. The workshop has 2 overhead cranes each with a lifting capacity of 5 tons. Furthermore, there is machinery for:

Rolling, plate cutting, TIG- MIG-/MAG welding, sawing, drilling etc.

A typical production progress in a steel chimney production is as follows: steel plates (purchased in agreed lengths) are rolled into plates for shells and liners; then they will be welded together as finished shells and liners. Shells made of black steel are mainly produced in the large workshop, and the stainless liners are mainly produced in the small workshop.

The liners will then be insulated and mounted into the shells after which the flue gas inlets, ladders, chimney tops and various equipment will be mounted. Then the chimneys will be transported to the painter's shop/a sub-supplier in order to be given a surface treatment.

The steel chimneys are produced with diameters up to 6,0 m and heights up to 140 m.

Important parameters

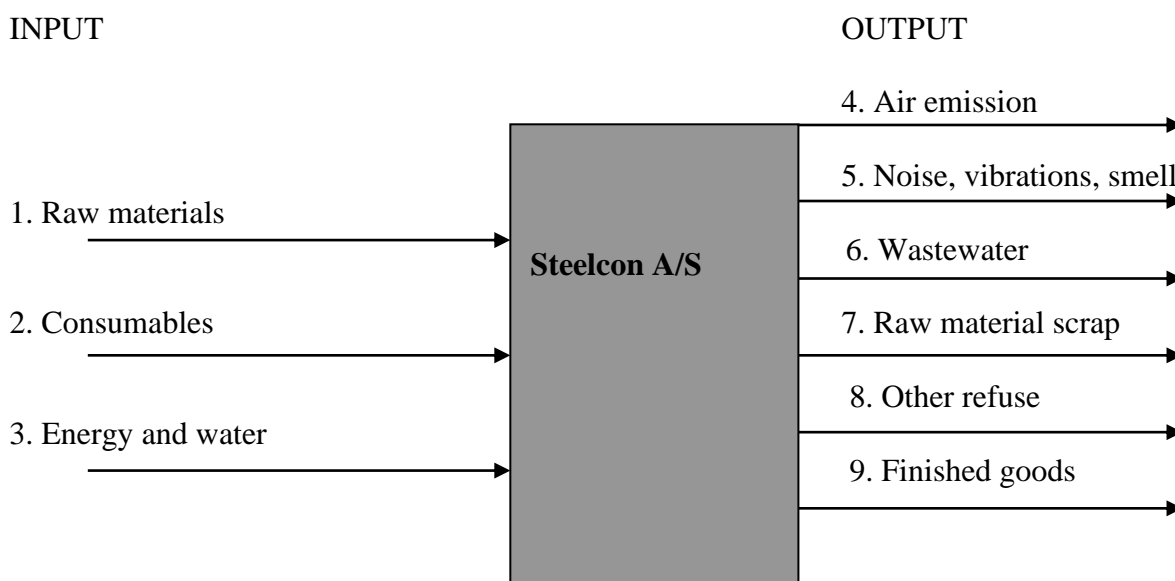
- | | |
|---------------------|---|
| • Raw materials | Steel plates, pipes, bar steel (black steel and stainless steel) as well as insulation. |
| • Filler materials | Welding thread and powder, oxygen, argon, CO ² propane gas, acetylene, hydraulic oil and cooling liquid. |
| • Power consumption | Lighting, process exhaustion, ventilation, welding, cranes, rollers etc. |
| • District heating | Heating and hot water for domestic use. |
| • Diesel oil | Forklifts for internal transport and 1 van. |
| • Propane gas | Flame cutting table and forklifts for internal transport. |
| • Water consumption | Water for domestic use and very little for our products. |

Important environmental parameters

- Air emission Power supply, district heating, exhaustion, gas, diesel and transport to painter's shop.
- Noise Exhaustion, transport, machinery and the different working processes.
- Waste Raw material scrap, filler material scrap, packing material and chemicals.
- Wastewater From sanitary installations only. We have no discharge of wastewater from the production.
- Environmentally non-acceptable substances We have no discharge into the earth, air or waters of any substances that are included in the list of substances +of non-acceptable substances

6. Specification of external Influence on the Environment

The most important external environmental parameters of the company are:



The influence of the company on the environment could be illustrated as the above example. In the below paragraphs we have stated all kinds of important environmental influence.

6.1. The most important raw materials purchased amounts

Table 1 Key figures of the most important raw materials used by the company. Year 2009 is reference

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021
Black steel	100	95	74	76	75	71	53	55	60	58	61	
Stainless steel	100	114	75	73	64	70	75	75	92	81	75	
Insulation	100	94	72	57	67	75	70	71	66	67	65	

Year i.e. index 100. Black- and stainless steel are stated as purchased amounts \pm materials on stock and turnover are also considered in the no. The insulation has been calculated on the basis of the purchased amounts.

The variation in consumption of stainless steel is due to change of markets. At the same time, we have started production in Slovakia where an increasing share of the total production is executed year after year. The figures in this environmental statement are for Esbjerg only.

We have analysed all index no. again, it looks like there have been big changes, but looking at the welding filler material, the average amount is nearly the same during the last years, that means that the output has not been less as it looks under point 6.1 table 1, this only shows that the investments we made in machineries, to save material, has given its results. Moreover, we have used all powder thread we had in our stock; therefore, the purchase has been so low as the index shows.

6.2. The most important other consumables, key figures

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021	
Weld filler material													
TIG, MIG and MAG thread	100	115	93	96	91	92	84	80	83	81	82		
Powder thread	100	124	94	121	99	93	109	39	62	59	60		
Powder flux compared to thread	100	93	100	79	92	98	77	204	134	129	131		
Thread consumption in % of powder consumption	100	120	109	105	106	81	78	77	75	74	77		
Gasses													
Oxygen in tanks*	100	94	99	87	83	99	98	92	72	69	71		
Oxygen in bottles	100	77	29	41	18	38	9	5	3	4	3		
Argon in tanks*	100	96	114	95	113	136	127	103	79	81	77		
Argon in bottles	100	196	197	146	119	145	150	153	79	80	78		
Argon mix in bottles - Atal	100	317	258	56	0	23	0	21	0	0	1		
CO ² in bottle battery and tank	100	96	105	88	97	117	103	89	87	86	85		
Propan tank - LGP mix.	100	94	81	76	81	78	80	71	51	64	63		
Acetylene in bottles	100	97	50	59	74	95	110	47	37	40	36		
Oil and cooling liquid													
Hydraulic oil	100	129	112	208	153	228	159	110	105	107	103		
Cooling liquid	100	0	0	0	55	0	60	0	0	0	0		

Table 2 Key figures of the important other consumables of the company, calculated on the basis of the amount per ton of finished products / turnover compared to the measured/purchased amounts. Year 2009 is reference year, i.e. index 100.

* = measured consumption

TIG, MIG and MAG threads are used as welding filler material when carrying out hand welding. Powder thread and powder flux are used as welding filler material for the powder welding towers.

The oxygen in tanks is mainly used at the cutting table and the oxygen in bottles is mainly used for the flame cutting hand tools/heating torches.

Argon in the tanks and CO₂ in the tanks are getting mixed in a blending plant and is then used as protection gas for welding.

The propane gas is used at the cutting table and for gas trucks.

The acetylene in bottles is used for flame cutting hand tools/heating torches.

Hydraulic oil is used for vibration dampers of the type of HDL.

Cooling liquid is used for vibration dampers of the TDL.

The consumption depends on the type of vibration damper that has been calculated for the individual steel chimney. You cannot compare the proportion between oil and cooling liquid due to the fact that only small amount oil is used for a HDL damper whereas the consumption of cooling liquid for a TLD damper is much higher.

However, for the last couple years we haven't manufacture dampers of the type TLD, that is why the consumption of cooling liquid is index 0.

6.3. Energy and Water

The heat consumption is solely district heating.

The water supply is from Esbjerg Kommunes water works (local authorities of Esbjerg).

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021
Electricity / power	808 Mwh	719 Mwh	804 Mwh	761 Mwh	686 Mwh	615 Mwh	552 Mwh	536 Mwh	548 Mwh	547 Mwh	599	
District heating	2153 Gj	2849 Gj	2437 Gj	2613 Gj	2491 Gj	1936 Gj	1765 Gj	1902 Gj	2008 Gj	1986 Gj	1855 Gj	
Water	902 m ³	825 m ³	863 m ³	843 m ³	745 m ³	665 m ³	609 m ³	588 m ³	651 m ³	651 m ³	638 m ³	
Diesel for truck	9918 ltr.	11699 ltr.	11996 ltr.	12810 ltr.	9719 ltr.	7919 ltr.	7138 Ltr.	8568 Ltr.	8093 Ltr.	8017 Ltr.	8001 Ltr.	

Table 3 The company's energy- and water consumption, measured amounts.

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021		
Electricity/ power	100	92	90	89	93	98	82	72	64	62	68			
District heating	100	107	104	109	120	137	104	100	92	90	89			
Water	100	96	104	108	102	108	106	118	119	117	115			
Diesel for truck	100	121	109	119	107	103	86	94	76	75	73			

Table 3a. The company's key figures of the energy- and water consumption, measured amounts.

Power consumption and diesel based on ton finished goods/turnover. District heating, dependant on weather and temperatures, based on m³ of the buildings. Water consumption based on number of employees. Year 2009 is reference year, i.e. index 100.

The energy consumption has been reduced in the latest couple of years, which is due to the larger and heavier steel chimneys we manufacture; we do not consume much power compared to the weight for the manufacturing of these large steel chimneys, and that's why we also expected a decrease of power consumption in general.

The large increase in heat consumption in 2009 and 2014 is mainly due to the extremely cold winters. In connection with our heat recovery system, there are some very long ventilation pipes externally which have not been insulated. At low temperatures, the heat recovery system has almost no effect. We have insulated the ventilation pipes by end of year 2014, and therefore a decrease is seen in 2015.

Furthermore, the many tons of steel we use for our production are very heat consuming as the steel is stored outside and that can have an influence on this.

The water consumption has been rather constant from 2009-2015, however, the water consumption has decreased due to various water saving initiatives such as water-saving sprinkling roses in shower cabins and water-saving toilets and have more or less also followed the no off employees.

The increase in 2017, was due to waterpipe had broken during Easter, which amounted to app. 75m³

6.4. Emission

The company does not cause any considerable emission from polluting processes. There is a process air suction system at the flame cutting table and at the welding working places. The process air suction systems are equipped with filters and cyclones acc. to the environmental legislation.

When we compare 2018 to 2017, there has been a decrease in the no off section, there also needed to be painted inside, that gives fewer transport to and from the paint shop.

The key figures of total emissions caused by power -, heat-, diesel-, and gas consumption as well as transport to/from painter's shop appear from the below table 4a.

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021
Total CO ₂ per ton finished goods	100	92	78	70	83	73	49	102	75	73	83	
Total SO ₂ per ton finished goods	100	116	96	103	118	100	79	153	117	114	112	
Total NO _x per ton finished goods	100	103	79	83	82	75	61	118	86	84	81	

Table 4a Key figures of the Company's total emission. They have been based on the figures from 2009 (reference year). Electricity and heating are the measured amounts. Diesel and gas are purchased amounts. Transport to painter's shop has been calculated on the basis of the average figures. No exact figures are available as the transports are carried out by external shipping agents. Calculated figures are based on Key2Greens' key figure tables/spread sheet.

6.5. Noise, vibrations and smell

Noise is a working environmental problem in Steelcon's workshops as the noise is generated indoors in connection with the handling and processing of the materials. The worst noise source is when we use hammers and grinders on steel plates and rolled plate sections for chimneys and liners.

The most effective result we have had was based on the use of noise absorbing walls that we mount in the workshop in order to reduce the noise as close as possible to the noise source.

We also purchased noise cushions for our welding towers which have further reduced the noise.

The external noise level is estimated to be within the limiting value as mentioned in the environmental approval.

Dust and smoke come from the welding- and cutting table processes. The dust and smoke are collected by filters and cyclones of our process air suction systems which are empties according to our maintenance system. The total amount of dust from stainless department (Lillebaeltsvej 95) is delivered as dangerous waste disposal.

We have never received any complaints from our neighbours concerning dust or noise.

There are no vibrations or smell that could be due to the company.

6.6. Waste Water

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021	
Amount of waste water	100	92	95	94	83	74	68	65	72	70	68		

Table 5 Key figures of amount of wastewater, calculated using the measured quantity of water consumption for vibration dampers. Index figures are based on figures from year 2009, i.e. index 100.

The total amount of wastewater of the company comes from the water consumption in connection with our internal/sanitary facilities and the waste water is discharged through public sewer system to Esbjerg kommunale rensningsanlæg (Esbjerg public waste water treatment). Look also 6.3. Energy and Water

The company's wastewater amount is below the water consumption, as a part – equivalent to the consumption of cooling liquid – is delivered together with our products.
The rainwater is discharged to the municipal rainwater system.

6.7. Raw Material waste

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021
Scrap % of used amount of black steel	100	86	100	87	117	209	167	149	114	116	132	
Scrap % of used amount of stainless steel	100	108	99	128	198	100	182	184	148	151	143	

Table 6 Key figures of the company's raw material waste (scrap). Scrap percentage is the weighed/invoiced scrap amount compared to steel consumption.

Scrap iron is stored in separate containers and from Jan. 2019 it is collected by the company Stena Esbjerg

6.8. Waste from other consumables, key figures

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021
Waste deposit/ton finished goods	100	77	82	56	69	74	61	57	60	59	58	
Powder and slags, collected weight.	100	103	126	50	77	37	0	0	0	0	0	
Cardboard and paper, collected weight	100	113	96	94	90	111	118	93	87	84	88	
Plastic wrap, collected weight	100	84	150	82	0	93	132	57	108	106	76	
Combustible waste for deposit	100	108	68	164	256	667	528	533	394	374	401	
Chemical waste (oil), collected weight	0	0	0	0	0	0	0	0	0	0	0	
Chemical waste (paint remains), collected weight	100	0	0	0	0	0	0	0	0	0	0	

Table 7 Key figures of the company's waste of other consumables. Year 2009 is reference year, i.e. index 100. The figures have been calculated on the basis of statement of waste deposit in kg. Waste deposit is per ton finished goods / turnover. Key figures of powder slags are calculated on the basis of key figures of reference year 2009, i.e. index 100. The rest is key figures based on the statement of the collected weights.

Remains for deposit, cardboard and paper, plastic refuse and items for combustion are collected by Marius Pedersen (Esbjerg Refuse Collection); they arrange the further working up/storing.

Chemical waste is received by I/S Esbjerg Modtagestation; they send the chemical waste to Kommunekemi.

The increase in Combustible waste for deposit from 2012 – 2020 is due to better sorting of waste in the workshops, there for the Waste deposit is also decreased more or less the same.

Since December 2017 NCC Industry Energivej 30 5260 Odense S has been collecting the powder and slags, after they have been collecting, we do not weigh the powder and slags anymore.

6.9 Finished goods

The finished goods are free-standing steel chimneys, ductings and pylons; the goods will be sent to a sub-supplier (painter's shop) for surface treatment.

Please also see the description under paragraph 5 Specification of Production.

The amount cannot be stated in relevant figures to be used as index figures due to the fact that the heights vary from 6 m to 130 m, and the diameters vary from ø 0.4 m to 6,0 m.

The estimated total weight of the finished goods has been calculated, i.e. purchased raw materials minus scrap and adjusted by the goods on stock. Please see the key figures in table 8.

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021	
Key figures of weight of finished goods	100	98	73	75	72	67	52	54	62	59	58		

Table 8 Key figures of the company's finished goods in tons total weight / turnover. The calculated amounts have been based on the purchased raw materials adjusted by the goods on stock less scrap.

7. Risks, Operational Disturbances

The company has no processes or stored goods that should be subject to the regulations of the risk assessment.

According to our estimation, operational disturbances should not course any increase in pollution. All types of oil and chemicals are stored indoors, and if an accident or waste should occur it would not cause any increase in pollution, as any waste would be absorbed by means of absorption materials.

The diesel oil- and hydraulic oil tanks above ground level are stored on Trays which are able to contain the contents of the tanks, and therefore any pollution of the earth or subsoil water would be avoided.

All machines are provided with necessary emergency stop devices.

In case of errors or choking up of filters of the air suction installation for welding smoke, the alarms will be activated, and the welding work will be stopped.

We have had no accidents or operational disturbances; therefore, there have been no inconvenience or pollution.

8. Own control

Steelcon make out monthly reports on consumption of power, water, refuse and scrap and yearly reports on consumption of raw materials and other consumables, replacement of filters/emptying of dust box of the air suction installation for welding smoke. Reports are kept of the yearly compulsory inspections/maintenance of the fork-lift trucks, cranes, gas tanks and fire extinguishing equipment.

The air suction- and ventilation installations are controlled twice a year by an authorised company. There are alarms for filter replacement/emptying of dust box on all air suction installations.

9. Results of measuring compared to the conditions

Except for a few times where the estimated consumption of filler materials has been increased, no deviations have been demonstrated compared to the conditions of the environmental approval.

- Hydraulic oil: estimated consumption 7.000 l/year, actual consumption 2016-2018: 5883 l/year. This result is due to the development of the product vibration dampers, according to Norm there are sometimes 2 dampers on one Chimney, therefore we have also changed the estimate per year and we do only a small number of liquid dampers, but more or less only use hydraulic oil.
- CO₂: the estimated consumption 3.000 Nm³/year, actual consumption 2016-2018: 3175 Nm³/year.

Since 2008, the CO₂ is delivered in tanks instead of bottle batteries, and the consumption has increased considerably due to higher evaporation in a tank, and leaks are more likely to occur as the gas is distributed in the factory in gas pipe system.

As to the amounts of scrap, there is one exceeding compared to the conditions.

- Powder and slags for recycling: estimated 20 t/year, ton is estimated on the average in the past 6 years: 20,8 t/year. This result is positive as the powder and slags are recycled.

10. Specification of Environment

Number of industrial accidents:

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2020	2021	
Number of accidents (notified)	3	5	3	2	4	2	1	1	1	1	2		
Frequency of accidents (Number of accidents per 1.000.000 working hours)	27,8	49,5	28,4	22,1	45,7	24,2	13,2	12,8	12,9	12,7	21,8		
Absence due to accidents – in hours (notified)	249	308	180	80	599	97	91	133	91	89	79		
Absence due to accidents – in hours (not notified – less than 1 day)	81	97	20	8	0	0	0	0	0	0	1		

Table 9 The company's rate of industrial accidents and the resulting sickness absence rate.

Notified accidents of work are accidents causing absence of more than 1 day.

Absence due to accident less than 1 day is usually due to "welding eyes", but also small injuries such as scratches etc.

11. Statement of Targets and Plan of Action from 2020 to 2022

Target	Plan of Action	Summary of Progress															
Target No. 1 – Reduction of total power consumption per ton finished goods by 2% per year.	Compressed-air system to be checked for leaks 2 times/year	Check of compressed-air system has been carried out, and the leaks have been repaired. The check is carried out twice a year.															
	Gas system to be checked for leaks 2 times/year	Check of gas system has been carried out, and the leaks have been repaired. The check is carried out twice a year.															
	Improved control of heat- and power consumption, and ventilation	<p>The table includes all consumption: Power-, heat-, diesel- and propane gas consumption.</p> <table><tr><th>Year</th><th>% Compared to year 2009</th><th>Compared to previous year</th></tr><tr><td>2018</td><td>20 %</td><td>-5 %</td></tr><tr><td>2019</td><td>18 %</td><td>-2 %</td></tr><tr><td>2020</td><td>20 %</td><td>-3 %</td></tr></table> <p>The target has been reached in 2018. Work continues to achieve keep the target.</p>	Year	% Compared to year 2009	Compared to previous year	2018	20 %	-5 %	2019	18 %	-2 %	2020	20 %	-3 %			
Year	% Compared to year 2009	Compared to previous year															
2018	20 %	-5 %															
2019	18 %	-2 %															
2020	20 %	-3 %															
Target No 2 – A reduction of heat consumption per ton/ finished goods to below the 2009 level.	Insulation of outdoors ventilation pipes at the for the heat recovery system.	<p>The table includes only heat consumption. Adjusted acc. to weather conditions and temperatures.</p> <table><tr><th>Year</th><th>% Compared to year 2009</th><th>Compared to previous year</th></tr><tr><td>2018</td><td>-37 %</td><td>-28 %</td></tr><tr><td>2019</td><td>-35 %</td><td>-20 %</td></tr><tr><td>2020</td><td>-3 %</td><td>-28 %</td></tr></table> <p>The target has been reached. Work continues to achieve keep the target.</p>	Year	% Compared to year 2009	Compared to previous year	2018	-37 %	-28 %	2019	-35 %	-20 %	2020	-3 %	-28 %			
Year	% Compared to year 2009	Compared to previous year															
2018	-37 %	-28 %															
2019	-35 %	-20 %															
2020	-3 %	-28 %															
Target No. 3 – Further reduction of the amount of waste for deposit by 5% per year/ton finished goods.	<p>1. Analysis of waste for deposit</p> <p>2. Improved sorting of waste</p>	<table><tr><th>Year</th><th>% compared to year 2009</th><th>Compared to previous year</th></tr><tr><td>2016</td><td>-43 %</td><td>-7 %</td></tr><tr><td>2017</td><td>-40 %</td><td>6%</td></tr><tr><td>2018</td><td>-41 %</td><td>3%</td></tr></table> <p>In total, the target has been reached since 2009. 2017 we had extra deposit of due to extra cleaning of the workshop. Work continues to achieve keep the target.</p>	Year	% compared to year 2009	Compared to previous year	2016	-43 %	-7 %	2017	-40 %	6%	2018	-41 %	3%			
Year	% compared to year 2009	Compared to previous year															
2016	-43 %	-7 %															
2017	-40 %	6%															
2018	-41 %	3%															
Target No. 4 – Reduction of waste of raw materials. Keep the scrap percentage below 10%.	Investments in a new rolling machine for profiles and a milling cutter in order to avoid a large waste when cutting flanges.	<table><tr><th>Year</th><th>Scrap percentage</th><th>Compared to 2009</th></tr><tr><td>2016</td><td>14,7</td><td>53,0</td></tr><tr><td>2017</td><td>11,7</td><td>22,0</td></tr><tr><td>2018</td><td>12,6</td><td>25,0</td></tr><tr><td>2020</td><td>13,6</td><td>26</td></tr></table> <p>The target is not quite reached. Work continues to achieve the target.</p>	Year	Scrap percentage	Compared to 2009	2016	14,7	53,0	2017	11,7	22,0	2018	12,6	25,0	2020	13,6	26
Year	Scrap percentage	Compared to 2009															
2016	14,7	53,0															
2017	11,7	22,0															
2018	12,6	25,0															
2020	13,6	26															
Target No. 5 – Reduction of frequency of accidents to 20 before end of 2017.	Focus on “order and tidiness” and 5S	<table><tr><th>Year</th><th>Frequency of accidents</th></tr><tr><td>2016</td><td>12,8</td></tr><tr><td>2017</td><td>12,9</td></tr></table>	Year	Frequency of accidents	2016	12,8	2017	12,9									
Year	Frequency of accidents																
2016	12,8																
2017	12,9																

New target set to - Reduction of frequency of accidents to 10 before end of 2019.		2018	12,7
The target is reached I 2018. Work continues to achieve keep the target.			

Table 10 Summary of targets and plan of action 2016-2020

12. Evaluation and priority

The evaluation and the priority have been made on the basis of the level of:
Operational costs, whether there is a conflict with the law, or whether there is an easy solution.

Environmental impact	Evaluation by experts/scoring	Evaluated highly by the authorities	Cust. interest	Employee inter.	Neighbour inter.	Appr. oper. costs/year	Conflict with law	Easy Solution	Subject to politics	Priority by Man. ment
Power cons.	9	No	No	No	No		No	Yes	Yes	2
Heat cons.	9	No	No	No	No		No	Yes	Yes	2
Water cons.	3	No	No	No	No		No	No	Yes	4
Waste deposit	12	Yes	No	No	No		No	Yes	Yes	3
Waste raw materials	6	No	No	No	No		No	Yes	Yes	1
Powder cons.	3	No	No	No	No		No	No	No	6
Noise level internally	18	Yes	No	Yes	No		No	No	Yes	5

Tabel 11 Evaluation and priority of subjects to be observed

13. Subject to be observed, Targets and results from 2018 to 2020

As the basis of subjects to be observed and priority, the following principles have been chosen:

Conflict with the law, conflict with the working environment, rate of environmental impact, subjects to cause economical savings, avoid disturbances of neighbours. Compulsory subjects and whether there are an obvious/easy solution to the problem.

Power	Target:	To reduce the power consumption currently.
	Result:	Reduction of the total power consumption by 2% per production hour/year
Heating:	Target:	Reduction of heat consumption.
	Result:	Reduction of the heat consumption to below the 2009 level.
Waste:	Target:	Further reduction of the amount of waste for deposit by improving the pre-sorting of waste.
	Result:	Reduction of the amount of waste by 5% per

year/ton finished goods.

Waste raw materials: Target: Reduction of waste of raw materials (scrap percentage).

Result: To keep the scrap percentage below 10%.

Accidents: Target: Reduction of frequency of accidents.

Reduction of frequency to 10 before the end of 2021.

All targets will be evaluated in Marts-2021 and changes to lower level to keep continuously working on get better and better.

14. Plan of Action

Energy:

Responsible Deadline

- | | | |
|--|----|----------------|
| 1. Inspection of any leaks of compressed-air system twice a year | DH | April and Oct. |
| 2. Inspection of any leaks of gas system twice a year | DH | April and Oct. |
| 3. Improvement of management of the ventilation system | TR | ongoing |

Waste:

- | | | |
|--|----|------------|
| 1. Analysis of waste for deposit | DH | 01.10.2018 |
| 2. Improved pre-sorting of waste acc. to the pre-sorting lists | DH | 01.10.2019 |

Waste of raw materials:

- | | | |
|---|----|---------|
| 1. Continue the project concerning the rolling of profile so the flanges should not be cut any longer with a large amount of waste. | TR | ongoing |
|---|----|---------|

Accidents:

- | | | |
|---|----|---------|
| 1. Work environmental group puts extra focus on accidents to avoid these. | TR | ongoing |
|---|----|---------|

Dominion Steelcon A/S
March-2020

Lars Bjerrum
QA Manager

Thomas Risløv
Factory manager.