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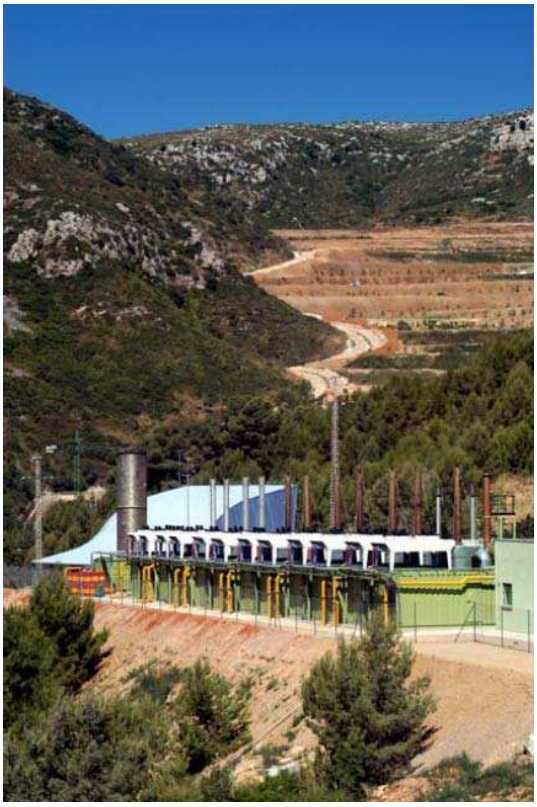
RECORD OF REVISIONS

Revision	Date	Reason and description
0	15/01/2007	First edition
1	31/01/2007	To bring Statement into line with observations made during internal audit
2	21/02/2007	To bring Statement into line with observations made during follow-up audit

1. INTRODUCTION

The Garraf biogas joint venture ("JV"), formed by Endesa Cogeneración y Renovables SAU and CLP Envirogás SL, is the concessionaire in charge of capturing and recovering biogas energy at the Controlled Deposit in the Vall d'en Joan, one of the largest in Spain. Since 1974 it has received the majority of the solid urban waste produced in the metropolitan Barcelona area (over 26,667,000 million tonnes until 31 December 2006 when it was closed). The controlled deposit is owned by EMSHTR (Metropolitan Entity for Hydraulic Services and Waste Treatment). Once this organic waste has decomposed, biogas is produced containing approximately 50% methane and whose calorific value is approximately half that of domestic natural gas. If this biogas seeps into the atmosphere it will contribute to the greenhouse effect (the global warming effect of methane is approximately 21 times higher than CO_2).



The Garraf biogas JV has built and operates a captation network which consists of approximately 260 biogas wells which are 20 metres deep and an energy recovery plant with 12 motorised generators each with a capacity of 1,048 kW (12,576 kW in total). Voltage at the substation is 66kV and the energy is transferred to the network via a newly installed electric power line.

The Garraf biogas JV facility therefore contributes significantly to sustainable development. Some statistics and positive aspects which contribute to the facility being able to work at full capacity include:

- The biogas is captured locally and suitably treated eliminating those unpleasant smells so characteristic of landfills.

The plant generates 100 million kWh a year which is the amount of energy the city of Barcelona consumes during a year in lighting its streets and monuments.

Some 56 million cubic meters of biogas are recovered a year and used as energy. Around 28 million cubic meters of methane are eliminated a year which is the equivalent of reducing CO_2 emissions by 420,000 tonnes a year.

2. DESCRIPTION OF THE FACILITY

The biogas plant is located at the controlled deposit of Garraf (Camí de la Sentiu s/n 08850 Gavà), in the province of Barcelona. The plant occupies approximately 2,000 m^2 and is accessed by the Sentiu motorway. The terrain is mountainous. The recovery facility is built on a long stretch of flat ground corresponding to the following coordinates: UTMx= 411,560 and UTMy=4,572,080.

The plant came on stream on 29 May, 2003 and is currently a fully stable operation.

The Garraf biogas JV does not have its own personnel and the day-to-day running and maintenance of the plant is contracted out to CLP Envirogás SL with six people employed at the plant. The operational and maintenance personnel are only present at the plant during standard working hours. Outside of these hours, the plant is operated automatically with no direct supervision. However, there is an automatic alarm system alerting the personnel on call of any incidences.

2.1. Biogas generated and captured at the Controlled deposit (CD)

The amount of biogas captured at the CD depends on the amount of theoretical biogas generated in the waste deposited and also the availability of captation areas and the kind of coverage. This is linked to the operation, closure and restoration programmes in place at the various areas described above.

During the first few years of operation, part of the CD was unavailable to capture biogas as it was in the area set aside for the effluent or because it was in the area

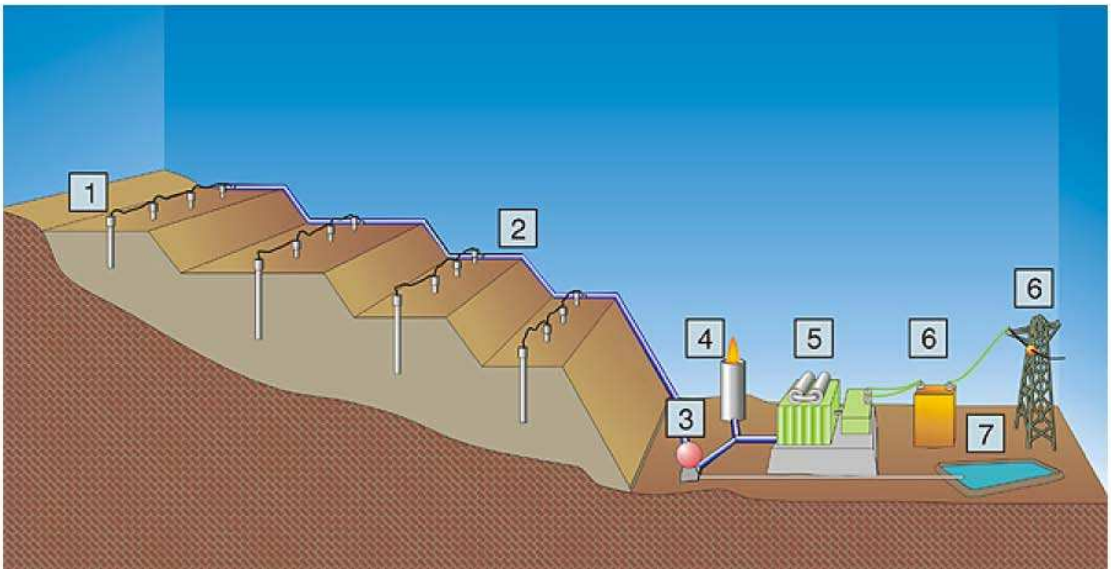
being restored. This demonstrates the difficulties in simultaneously carrying out landfill or restoration activities whilst operating a biogas plant at the same time given the interferences which may occur. However, the deposit ceased its activity as a dump on 31 December 2006. Therefore parts will be renovated in 2007 to expand its biogas capitation network.

It is expected that the plant will capture the maximum amount of biogas in 2007 or 2008 once zone 3 of the CD has been restored and zone 4 closed.

2.2. General overview of the process

A total of 12 motorised generators each with a capacity of 1,048 kWe (12,576 kWe in total) have been installed both as containers and in a modular structure.

The following diagram shows the basic layout of the installation.



Approximately 300 captation wells have been drilled on the surface of the CD (1). A network of pipes leads to two general collection points measuring 355 mm in

diameter on both sides of the CD (2), carrying the biogas to the condensation separation unit and then on to the central extraction unit (3), which contains three fans each working at 3,000 m^3/h. These fans keep the whole biogas field depressed and propel the biogas towards the 12 motorised generators (5), which produce 12.5 MW of electricity at a voltage of 6.3 kV which is then raised to 66 kV at the substation and carried out to the electricity network via a new line (6). In order to correctly treat an excess of biogas at any given time, the plant has a high-temperature flame (4) which can reach temperatures in excess of 1,000ºC.

The condensed matter which had previously been separated in the suction unit is sent to the landfill's septic pond (7) to be correctly treated.

2.3. Summary of activities

The work carried out by the plant's personnel can be summarised as follows: -operation and preventative maintenance of the JV's installations, specifically the 12 motorised generators, the three fans, the flame and any additional equipment necessary for the correct working of the above.

-The corrective maintenance of the JV's installations and repair of any breakdowns which might occur.

-Management of the gas field and periodical analysis of the flow and quality of the biogas at each well.

-The coordination and supervision of any other job carried out at the Garraf biogas JV's installations.

3. ENVIRONMENTAL POLICY

The Garraf biogas JV regards environmental excellence as a bedrock value of its corporate culture. Accordingly, in all its activities the project is respectful of the environment and conforms to the principles of sustainable development, and it is firmly committed to the conservation and efficient use of resources.

To fulfil its environmental commitments, the Garraf biogas JV applies the following basic principles, which are enshrined in its environmental policy:

-Integration of environmental management and the concept of sustainable

development in corporate strategy, using environmental criteria documented in the planning and decision-making processes.

-Rational use of resources and reduction of waste production, emissions, effluents and other environmental effects, through the application of continuous improvement programmes and the establishment of environmental objectives and targets, ensuring that the Garraf biogas JV's plants and activities are increasingly respectful of the environment.

-Permanent safeguards to ensure that the provisions of current legislation and other requirements imposed by the organisation are met; and periodical reviews of the installation's environmental performance and safety and duly reporting the results.

-Conservation of the facility's natural surroundings by adopting measures designed to protect plants and animals and their habitats.

-Application of the cleanest, most efficient and economically viable technologies at its facilities and promotion of technological research and development of renewable energy sources.

-Raising awareness of and sensitivity to environmental protection issues, through internal and external training programmes and collaboration with public-sector authorities, institutions and citizens' associations in all areas where it is active.

-Encouraging contractors and suppliers to implement environmental policies based on these same principles.

-Encouraging energy saving and the rational and balanced use of the various energy sources.

4. DESCRIPTION OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

In order to guarantee that the Garraf biogas JV not only fulfils but will continue to fulfil the requirements established by legislation and its own environmental policy, an Environment Management System (EMS) was established in 2005 in accordance with UNE-EN ISO 14001:2004 standard and Regulation 761/2001 of the EU's Eco-Management and Audit Scheme (EMAS).

The EMS in place at the Garraf biogas JV is part of a general management system which is aimed at developing, implementing, carrying out, reviewing and up-dating its Environmental Policy. This includes:

- The organisational structure at the Garraf biogas JV;
- Planning activities which have or could have significant repercussions on the environment;
- Defining responsibilities at all levels of the organisation;
- The practices, processes and procedures, documented or otherwise, which are necessary to carry out the activities as planned;
- The necessary resources.

5. ENVIRONMENTAL INFRASTRUCTURE

The main mechanisms and systems installed to correctly control and treat environmental issues arising at the plant are described below:

5.1. Storage tanks for clean and used oil

Adjoining the building housing the motors there are two underground horizontal cylindrical tanks used for storing clean and used oil, respectively.

These tanks are equipped with pipes, valves and accessories such as the loading and unloading pumps used in the circuits for the clean and used oil. The tanks also include instruments which measure the level of the oil.

Also, in 2006, a new 25 m^3 above-ground oil storage facility was installed. This has its own opening which is connected to the motors' oil circuits meaning that the underground clean oil tank is now only used on certain occasions. The deposit has its own valve and level control system as well as concrete restraining units to avoid possible spillages.

These deposits facilitate the management of clean lubricating oil and used oil which is removed periodically by an authorised waste manager.

5.2. Continual emissions control system at motorised generator 1

In accordance with the Environmental Licence issued by the Gavà Town Council, the JV's installations have a continual emissions control system installed at motorised generator 1, namely the Siemens Ultramat 23 model.

The continual control system installed in the extraction conduit of the motor allows the continual monitoring of CO and O_2 to ensure compliance with the limits established in the above mentioned Environmental Licence. In order to correct the emission figures of the components measured in standard conditions, the flow, temperature and pressure of the gases are measured.

The data are input into a computer which then calculates and exhibits the emission levels under normal conditions.

5.3. Waste storage unit

In order to optimise waste management, a qualified waste manager was hired and a waste storage unit was built next to the existing warehouse.

The various containers are labelled correctly and are housed in this unit. This is where the waste is stored prior to being collected, managed and treated by the authorised manager.

5.4. Other environmental infrastructure

The plant has other mechanisms in place to control the environmental features, of which we would highlight:

-A flow meter measuring the flow of condensed effluent in TIRSSA's septic pool.
-Continual control of the flame.
-A control of the motorised generators to optimise emissions.

6. KEY ENVIRONMENTAL FEATURES

The EMS in place at the Garraf biogas JV states that a specially prepared questionnaire will be used to determine the nature of the aspects and their impacts at the plant. Those environmental aspects which meet some of the following conditions are considered "significant":

a) There are legal limits set (or voluntarily assumed by the Garraf biogas JV) for certain environmental aspects and the value measured (or estimated) may not exceed the percentage set as a benchmark. In the specific case of emissions into the atmosphere, the benchmark percentage is 75% (unless the limit is conditional upon exceeding a certain flow in which case the benchmark value would be 90% of the flow).
b) If the aspect refers to the production of waste and the amount generated (or

estimated) represents at least a 25% increase over the previous value, so long as the residue is removed at least once every three months.

c) If the aspect relates to the consumption of raw materials or energy and the value measured (or estimated) shows an increase of at least 25% compared to the previous valuation.

d) If the aspect relates to dangerous raw materials and the volume or frequency of manipulation are high. In any case, if it is deemed necessary to carry out a valuation, justification must be given (possibility of confinement, level of threat posed, etc...).

e) If the aspect is associated with an emergency situation and there has been an accident in the past year.

f) If the aspect is associated with some kind of "significant" environmental impact. The following criteria are used to gauge the "significance" of the environmental impact:

- A legal limit has been set for the Garraf biogas JV's legal limit, or has been assumed voluntarily, for the impact and value measured (or estimated) so that the contribution of the JV's installations may exceed the benchmark percentage. The benchmark percentage shall be 80% of the limit when evaluating the impact.

g) The aspect relates to an indirect aspect of the activity carried out by the Garraf biogas JV, if some of the following situations arise: -There is no evidence that the person or company directly in charge of the aspect is authorized by the competent body to carry out said responsibility

- -There is evidence that the person or company directly in charge of the aspect has not fulfilled some of the requirements established by the competent body to carry out said responsibility.
- The person or company directly responsible for the aspect does not have an EMS, or

h) The aspect is indirectly related to the subcontractors at the Garraf biogas JV who carry out tasks at the plant, and a statement of non-conformity with said contractors has been submitted in the past year.

All “significant” and “non-significant” environmental aspects which meet the following condition are deemed to be controlled:

- The Garraf biogas JV is obliged to keep these under control under the terms of the applicable environmental legislation or on a voluntary basis.

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6.1. Significant environmental aspects

Significant environmental aspects at the Garraf biogas JV are as follows:

-Emissions into the atmosphere from motorised generators 1 to 12.

-Used lubricating oil.

The atmospheric emissions from the motorised generators are significant in terms of CO emissions which, even though they do not exceed the limits established in the Environmental Licence, are above the 75% limit of 1,000 mg/Nm3. Also, with regard to some of the motorised generators, namely numbers 2, 5 and 6, COT emissions are also significant as these are always below the limits established in the Environmental Licence. The environmental impact linked to emissions is the ambient immission of the gases in question.

The lubricating oil used and the frequency with which it is handled (it is collected on a monthly basis) and the possible impact a spillage could have as well as the contamination of the soil and underground water systems. With regard to the various aspects concerning oil, we would note the significant changes made to the storage of clean oil as the frequency with which it is delivered has fallen notably with only two deliveries during 2006 (in 2005 there were 11 deliveries); also the oil filters have been changed due to an internal suggestion and the number of filter changes has fallen considerably although, as it is collected so infrequently, we are unable to clearly quantify this.

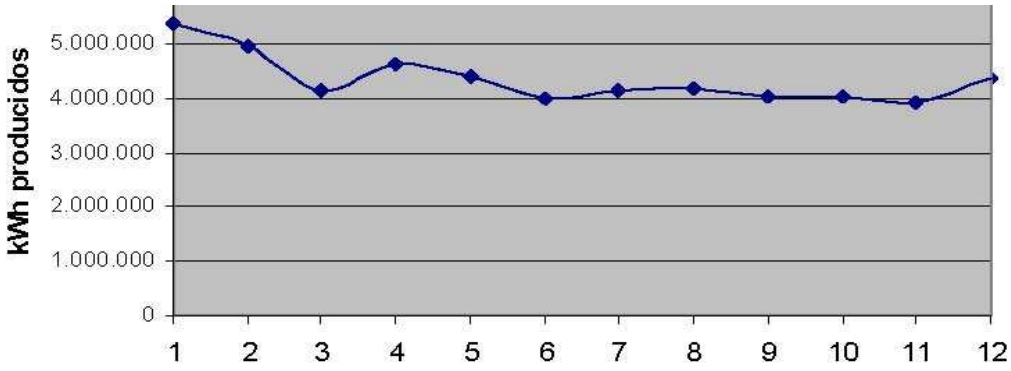
No significant aspect has been detected from the indirect aspects.

7. ENVIRONMENTAL MANAGEMENT

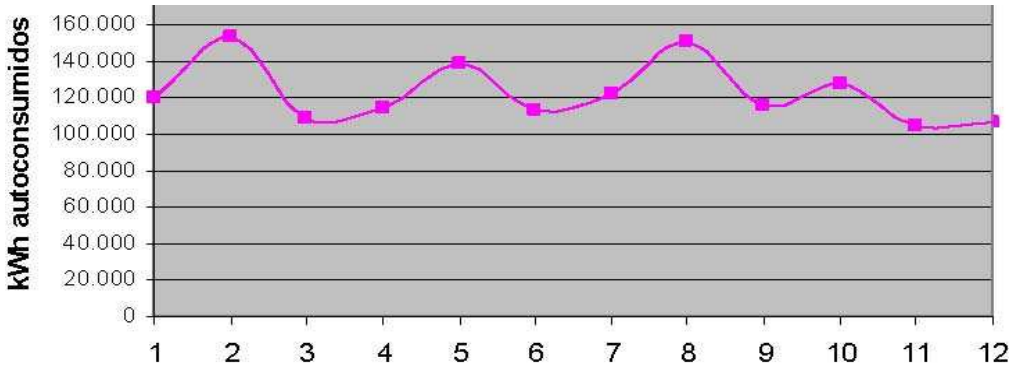
7.1. Follow-up of development

The graphs below who the operating results at the Garraf biogas JV during 2006. WE would note that the plant was not working at full capacity.

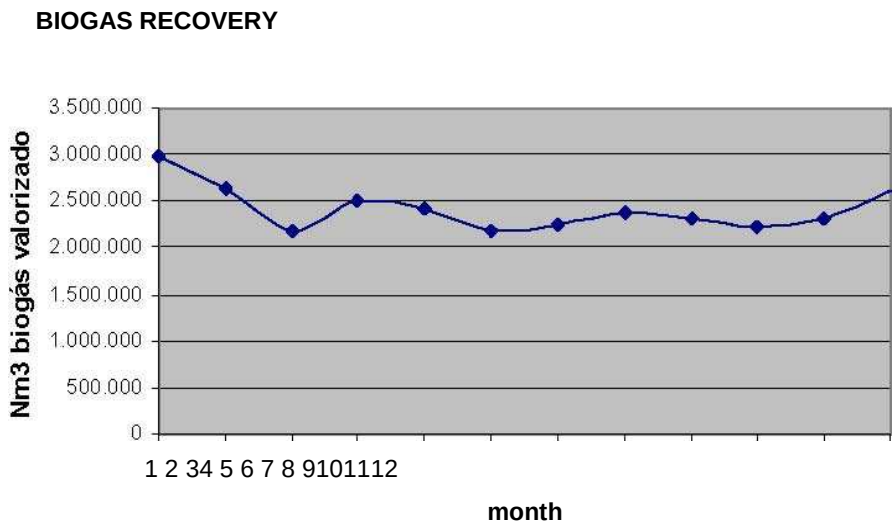
ELECTRICAL PRODUCTION



month ELECTRICITY CONSUMPTION



month



The installation has operated correctly during the period under review with no significant changes in production or consumption, although production did fall in the first quarter of the year. We should point out that the biogas reduced is not measured directly at the plant but is an estimate based on the gross energy generated by the motors.

7.2. Quantifying environmental aspects

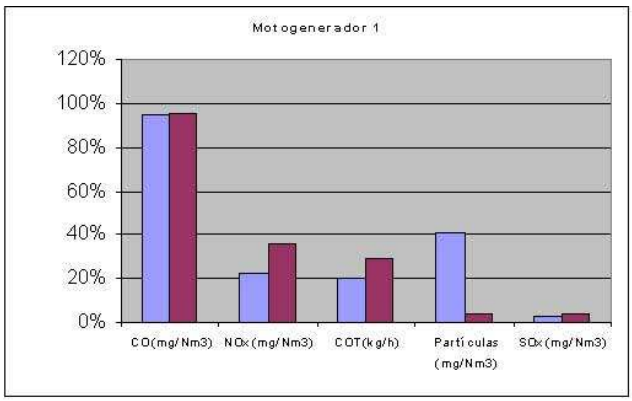
Even though the Environment Management System was not operational at the beginning of 2005, we have made comparisons with figures from that year providing they could be fully checked. Therefore, we would quantify some environmental aspects.

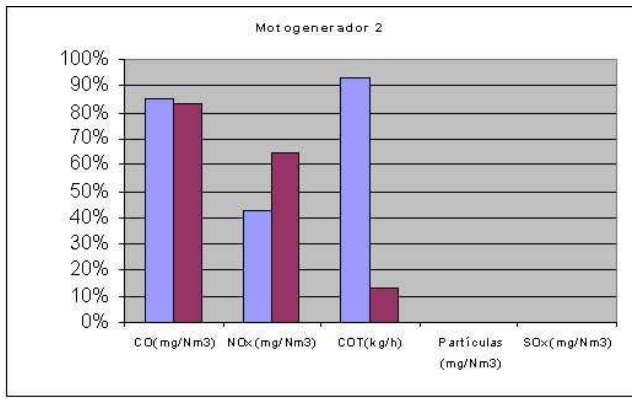
7.2.1. Atmospheric emissions

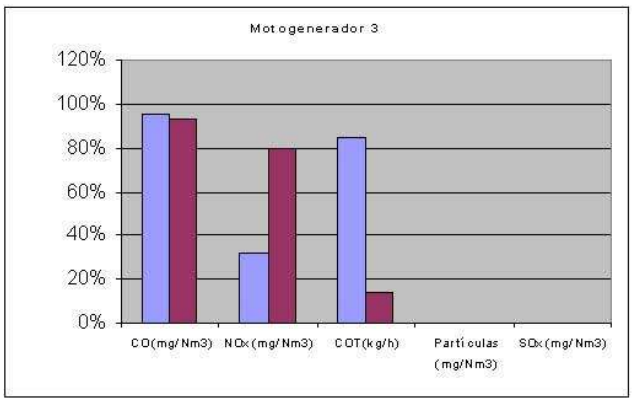
The following graphs show performance of the atmospheric emissions of each of the 12 motorised generators (emission sources) at the controls carried out to date, namely, the second control for the Environmental Licence dated 28/02/06, and the third periodical control dated 02/01/07.

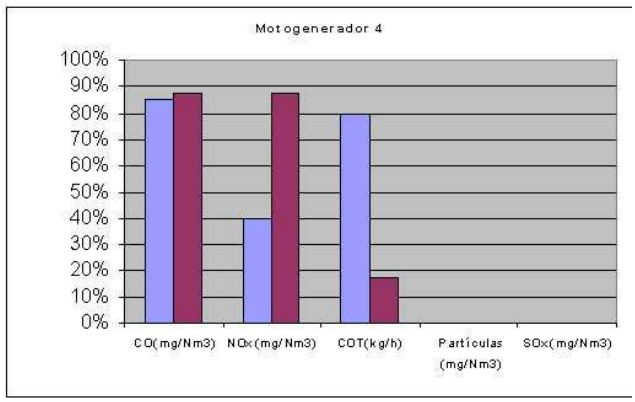
We should point out that in the both periodical controls we only measured CO, NOx and COT, expect for in motor 1 where all emissions stated in the Environmental Licence were measured.

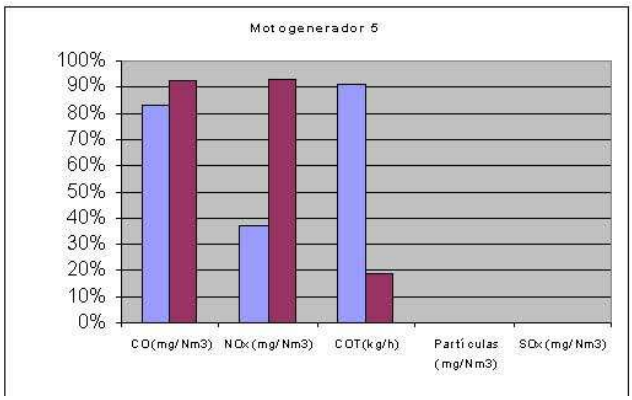
The table below shows the various atmospheric emissions measured as percentages over the limit stipulated in the Environmental Licence for each of them. The blue indicates the measurements taken at the second control whilst the red corresponds to the measures taken at the third periodical control.

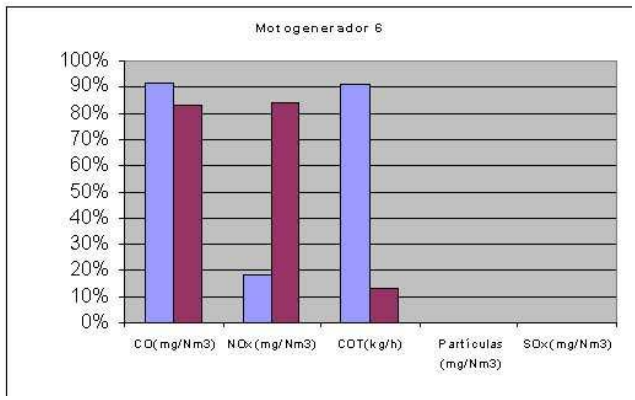






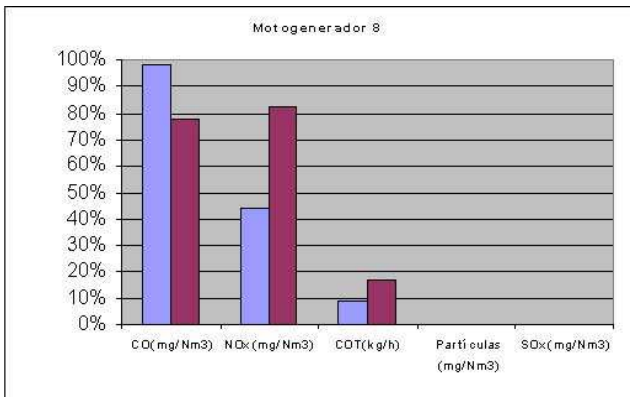




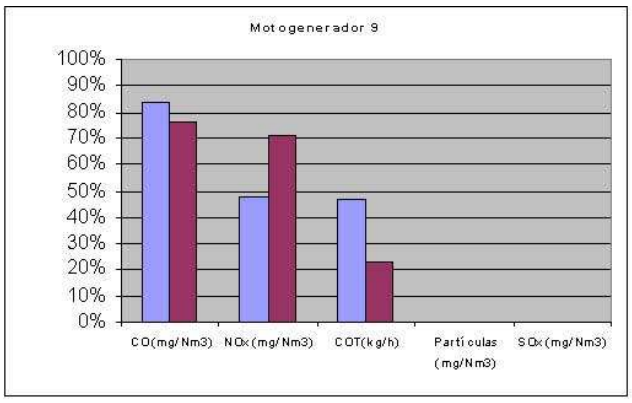


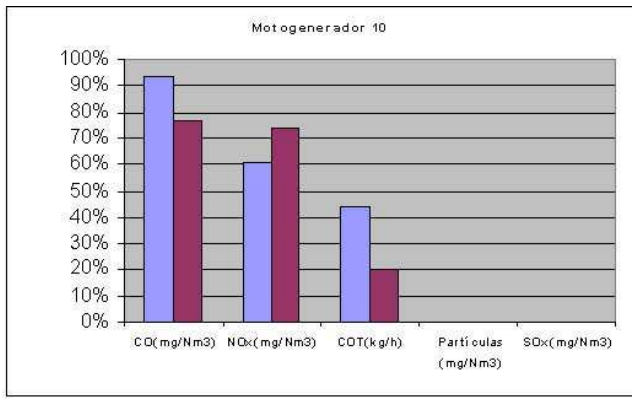
Motorised Generator 7

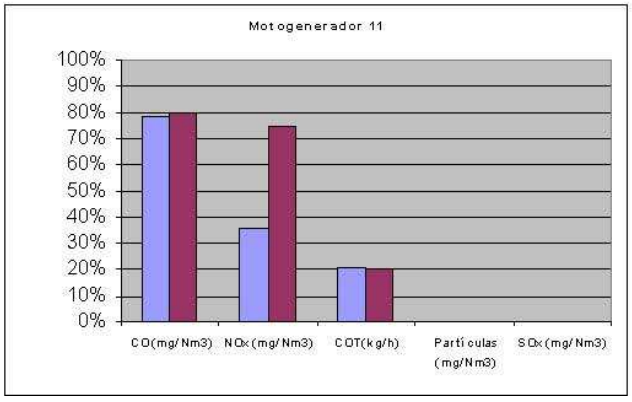
100% 90% 80% 70% 60% 50% 40% 30% 20% 10% 0%

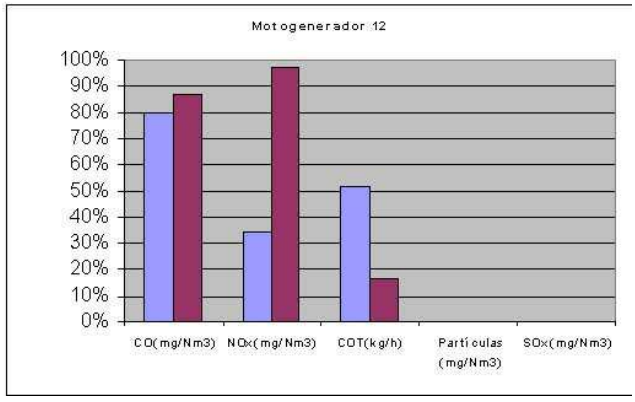


CO (mg/ Nm3) NOx (mg/ Nm3) COT(kg/ h) SOx particles (mg/ Nm3) (mg/ Nm3)









The Environmental Licence sets the following emission limits:

NOx <1,500 mg/Nm^3 referred to 5% of O2

CO < 1,000 mg/Nm^3 referred to 11% of O2

SOx <300 mg/Nm^3 referred to 5% of O2

Particles <50 mg/Nm^3 referred to 5% of O2

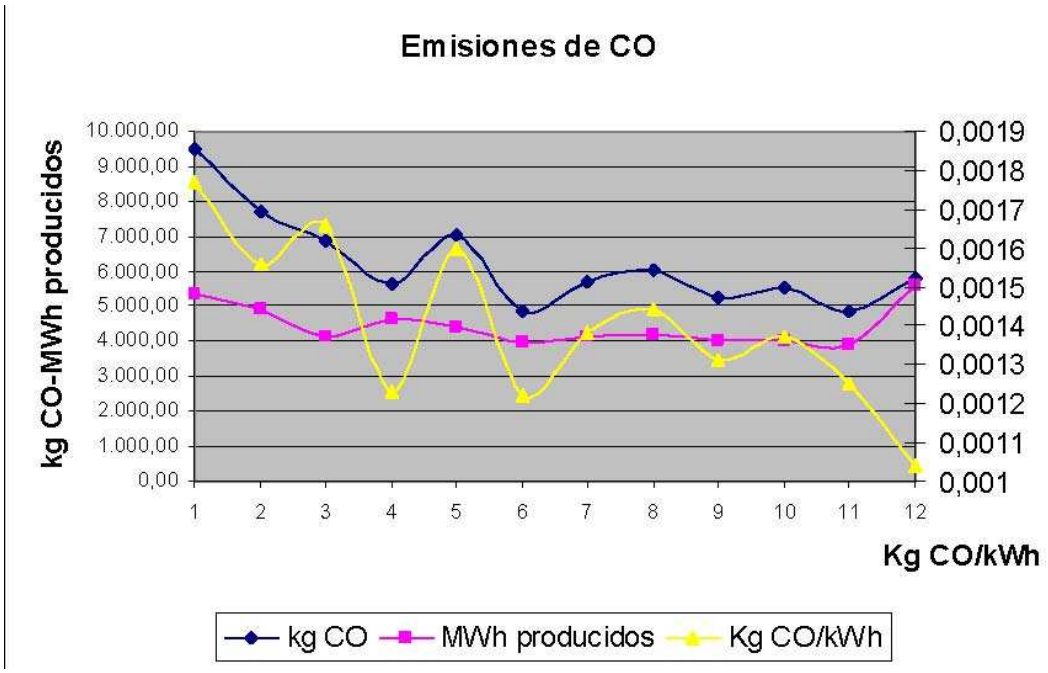
COT < 150 mg/Nm^3 as of 3 kg/h All of the emission limit measurements refer to dry gas and are expressed under normal temperature (0 ºC) and pressure (760 mm Hg) conditions.

The differences in the readings are mainly due to various specific features of the installation which produce the following most significant alterations:

- The irregular composition of biogas depending on the area it is taken from, the type of rubbish deposited and how old it is and the pressure which has been used to extract the biogas. It is important to remember that biogas is used in the motors and any alteration can affect emissions.
- The motors are all maintained in accordance with the programme established by the manufacturer although it is true to say that this maintenance is carried out at specific given moments whilst some motors may be close by to others which are undergoing preventative maintenance works or to others where work has been carried out recently. This can also contribute to fluctuations and decreases in emissions concentration.
- In spite of this, emissions levels are always below the limits established by the Environmental Licence. It is therefore safe to state that we shall continue to carry out maintenance on the motors in the same way as in the past.

The ongoing control of CO emissions enables us to chart the total CO emissions (kg month), taking the measures from motor 1 as being representative of the average of the rest of the motors as contemplated in the Environmental Licence for the Garraf biogas JV. Likewise, these emissions are benchmarked to the monthly gross production of electricity giving the indicator of CO/ kWh of energy produced.

The chart shows how CO emission figures approximately follow the trend of electricity production apart from two months when specific CO emissions are slightly higher. Even so, the fact that there is only a discrepancy in one reading would appear to indicate that CO emissions are being correctly controlled.



It should be remembered that when methane is burnt CO_2 is produced but that as this comes from residual organic matter (i.e. non-fossil), this contributes nothing to the CO_2 balance.

7.2.2. Liquid effluent

The Garraf biogas plant has three types of effluent:

-Waste which is condensed when capturing biogas
-Sewage water

-Rain water

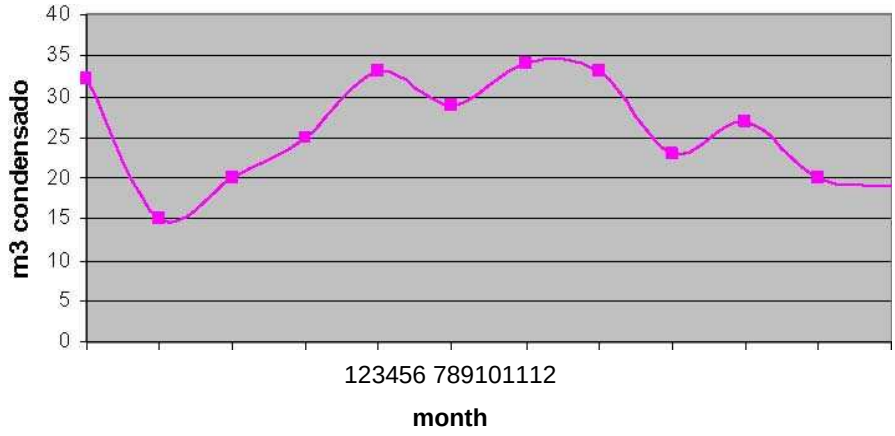
With regards to rain water, any run-off is channelled directly to a collection point and then on to a natural lake.

Household sewage: showers, washbasins etc. are channelled to a building where they are pumped out by TIRSSA, the public company which operates the CD, which then channels the water to the Gavà Viladecans purification plant. A copy of the relevant permit issued to the Gavà Viladecans purification plant by the EMSHTR, owner of all the controlled deposit installations, is available for inspection. This permit guarantees that all the sewage water at the Garraf biogas JV is correctly managed.

Waste which is condensed when capturing biogas When the biogas leaves the controlled deposit it is coated in moisture which is then condensed in the conduits leading to the motorised generators. An automatic electric pumping system has been installed at the lowest point of the biogas transport circuit when it is being transported to the fans. This system sends the condensed biogas which has been separated to the septic pool owned by TIRSSA, and is then treated at the septic plant. Quarterly reports presented to the Waste Board are kept on file. These confirm the correct treatment and management of the condensed particles transported from the Garraf biogas JV by TIRSSA.

There is a flow meter available which calculates the amount of condensed material sent to the septic pool. The following is a monthly record of the amount of condensed material sent to the septic pool.

CONDENSED WASTE PASSED TO TIRSSA



This amount is less than 1% of the volume collected directly by the activity of the CD itself bearing in mind that in the first six months of 2005, 2,956 m^3 of septic waste was captured a month.

7.2.3. Waste

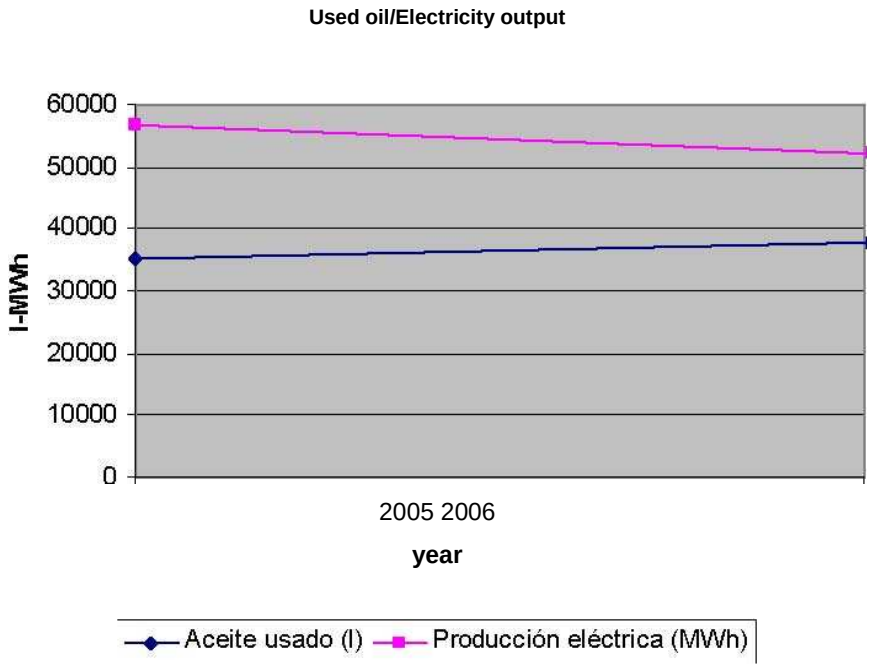
During 2006, only two types of waste were managed by the Garraf biogas JV: used lubricating oil and oil filters/contaminated cloths as not enough of the other types of waste generated at the installations was produced. The amount of waste produced during the period which this statement covers was:

	2005	**2006**
Used lubricating oil (l)	35,100	37,850
Filters, contaminated cloths (kg)	1,467	998

The Garraf biogas JV holds the certificates and procedure documentation issued by the waste management companies hired guaranteeing the correct transport and treatment of the waste.

The chart below shows the evolution of the lubricating oil generated used in the

production of electricity. Despite lower electricity output, more used lubricating oil was generated, rising from 0.61 l/MWh in 2005 to 0.73 l/MWh in 2006. However, this difference is not disproportionate and is largely due to the fact that, as of March, maintenance work for the overhaul of eight motors was carried out which meant providing for oil changes at the majority of the motors.



7.2.4. Noise and vibrations

No significant changes have been made at the installations, therefore no noise survey was performed in 2006. Therefore, the study carried out when the Environmental Licence was first awarded remains valid. This study deemed the measures carried out as sufficient.

7.2.5. Handling and storage of hazardous substances

The storage of clean oil is one of the aspects which changed from Significant in 2005 to a

Not Significant/Controlled in 2006. The following chart compares the amounts of oil supplied and the amount transported (and therefore tanker loads).

	2005	**2006**
Clean oil supplied (l)	109,385	46,264
Number of times clean oil transported	11	2
Average amount transported (l/transport)	9,944	23,132
Specific amount of clean oil supplied (l/MWh)	1.91	0.89

The lower supply of clean oil in 2006 is largely due to the lower electricity output and also lower consumption by motors as an overhaul was carried out in March-June. Even still, these figures are not proportionately logical as we can see from the figure for the specific amount of clean oil. This is largely due to the new 25,000 l storage deposit which means that amounts stored at the beginning and end of the year are particularly relevant. Therefore, if we consider that the level of clean oil at the end of 2005 was 32,500 l (the 25,000 l tanker was not available at the beginning of 2005, so we do not consider the level there might have been as significant), and that at the end of 2006 this was 18,410 l, the previous table can be amended as follows:

	2005	**2006**
Clean oil used (l)	76,885	60,354
Specific amount of clean oil used (l/MWh)	1.34	1.16

It is also worth noting the decrease in the number of times oil was transported in 2006 due to the satisfactory installation of the new oil tank.

7.2.6. Use of resources

The following table shows a breakdown of consumption at the plant compared to 2005 (in some cases supplies are practically the same as consumption as there is very little storage capacity).

	2005	2006
Supply of liquid fuel (l)	6,000	6,899
Supply of drinking water (l)	60,000	60,000
Specific supply of drinking water (l/MWh)	1.05	1.15
Consumption of oil in motors (l)	41,785	24,752
Specific consumption of oil in motors (l/MWh)	0.73	0.48

Supply of liquid fuel is closely linked to the activity of biogas production, much more than electricity production. In 2005 and 2006 the figure is practically identical. The specific supply of drinking water is reasonable. It is worth noting that specific oil consumption by the motors was much less, largely due to the overhauls carried out in Mach-June 2006. In order to calculate oil consumption we have considered the levels of the oil tanks at the end of the year.

7.2.7. Other

Finally, as regards emergency situations, even though a fire broke out in one of the motors in October, the alarm system worked properly and the personnel on call were alerted and the fire was put out using the extinguishers available.

7.3. Environmental training

In 2006, the entire plant's workforce completed an environmental training course:

- Technical and practical training regarding pollutant emissions in alternative internal combustion motors of the Otto cycle (28/06/2006). This was given by the UPC's Department of Machinery and Thermal Motors. Programme:
    - Introduction, parameters affecting pollutant emissions
    - Training in mixing types according to dosage
    - Ready-mixed combustion
    - Pollutant emissions: causes and ways of reducing these
    - The Garraf plant: architecture and control criteria for the motors

-Pollutant emissions' measuring techniques The second course planned for 2006 on separating waste at source did not take place and was postponed until the first quarter of 2007.

7.4. Environmental programme

The Environmental Management Programme is part of the Garraf biogas JV's ongoing improvement programme.

The Garraf biogas JV's objectives are based on:

- The JV's production objectives and targets.
- Environmental policy.
- Environmental objectives and targets for the current year and level of achievement.
- Actions to be carried out due to changes to the legislation and those forecast for the future.
- Significant environmental features and impacts.
- Technological options available.
- Financial, operational and business requirements.
- The opinion of the interested parties.

7.4.1. Objectives

The Garraf biogas JV has set up an EMS for 2007 with the following environmental objectives and targets:

1. Increase the CD's degasification capacity by 15% vs. 2006
    i. Drawing up a technical proposal to boar the maximum number of wells possible depending on the availability of areas at the landfill site while trying to maximise the efficiency of each well.

ii. Study and request offers to supply the components, materials and labour necessary to carry out the boarings.
iii. Choose the best offer and formalise order.
iv. Monitor the project during the boaring and connection phase.

2. Reduce the environmental impact of the fan platform
    i. Carry out a technical study specifying the effect of minimising the impact of the fan platform in terms of noise and visual impact.
    ii. Contract and supervise the work needed to reduce the environmental impact of the fan platform.

3. Reduce the number of collections of used lubricating oil
    i. Drawing up a technical study to minimise the frequency of oil collections and, thereby, reduce the risks of the possible impact of handling used lubricating oil.
    ii. Study, request and choose offers to supply the components, materials and labour necessary to carry out the technical project.
    iii. Monitor the project during the installation and implementation phase.

The first objective is aimed at improving the capture of biogas and helping the degasification of the landfill thereby preventing biogas seeping into the atmosphere unchecked. The second objective is mainly aimed at minimising the possible environmental impacts the fan platform might have, i.e. noise and visual impact. The third is aimed at making significant changes to the handling of “used lubricating oil” as the less often this dangerous residue is handled, the less likely spillages are to happen and therefore the lower the negative environmental risks.

7.4.2. Fulfilling the Environmental Management Programme

The 2005/2006 Environmental Management Programme was fulfilled within the established timeframe. A new 25,000 l oil facility has been installed which has significantly reduced the frequency of deliveries and a waste control database has

been set up.

The following environmental objectives and targets were set out in the previous Environmental Management Programme:

1. Reducing the number of clean oil unloadings

    i. Drawing up a technical proposal to minimise the frequency of orders for oil and therefore, reducing the risk of possible oil spillages when filling up oil tanks.
    ii. Study and request offers to supply the components, materials and labour necessary to carry out the technical project.
    iii. Choose the best offer and formalise order.
    iv. Monitor the project during the installation and implementation phase.

2. Create a waste management data base

    i. Code and sort by type the waste in each specific container for separation.
    ii. Create a data base to optimise the management and control of waste management.
    iii. Make the database available to the plant foreman and explain to him how it works, to ensure it is monitored and updated.

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