

Hydrocarbon Exploration program - Exploration Well Asopus-1 in Block 2 – Ionian Sea

ECF3008

Waste Management Plan (WMP)

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ABBREVIATIONS

ABBREVIATIONS	EXPLANATION
AH	Absolute Hazardous
ANH	Absolute Non-Hazardous
BAT	Best Available Techniques
CDW	Construction and Demolition Waste
BOP	Blowout Preventer
BWMS	Ballast Water Management System
EDS	Emergency Disconnect Sequence
ELW	European List of Waste
EPR	Extended Producer Responsibility
ESIA	Environmental and Social Impact Assessment
EU	European Union
GG	Government Gazette
HEREMA	Hellenic Hydrocarbon and Energy Resources Management
HSE	Health Safety and Environment
IMO	International Maritime Organization
JMD	Joint Ministerial Decision
LMP	Liquid Mud Plant
KPIs	Key Performance Indicators
LWD	Logging While Drilling
MH	Mirror Hazardous
MNH	Mirror Non-Hazardous
MODU	Mobile Offshore Drilling Unit
NADF	Non-Aqueous Drilling Fluids
NPHWM	National Hazardous Waste Management Plan
NoWO	Notification of Well Operations
NWMP	National Waste Management Plan
P&A	Plug and Abandonment
PAYT	Pay As You Throw
PPE	Personal Protective Equipment
PSV	Platform Supply Vessels
ROV	Remotely Operated Vehicle
WBDF	Water-Based Drilling Fluid
WBM	Water-Based Mud
WFD	Waste Framework Directive
WEEE	Waste Electrical and Electronic Equipment

ABBREVIATIONS	EXPLANATION
WM	Waste Management
WMP	Waste Management Plan
UCO	Used Cooking Oil
UNEP/MAP	United Nations Environment Programme / Mediterranean Action Plan

1 Introduction

1.1 Scope and Objectives of the Waste Management Plan

This Waste Management Plan (WMP) defines the scope, objectives and mandatory requirements for identification, handling, segregation, storage, transport, treatment and final disposal or recovery of all waste streams anticipated during the mobilization, drilling, and demobilization phases of the “Hydrocarbon Exploration program - Exploration Well Asopus-1 in Block 2 – Ionian Sea” ¹.

The WMP sets out procedures and operational controls for the classification, quantification, management, monitoring, reporting and recordkeeping of hazardous and non-hazardous wastes, and promotes waste minimisation, reuse and recovery in accordance with the EU waste hierarchy together with applicable national requirements, permit conditions and relevant industry guidance.

The WMP applies to all waste generated directly or indirectly by the Project, whether offshore or onshore, and to all personnel, contractors and subcontractors engaged in project activities. The WMP establishes clear roles and responsibilities for waste segregation, temporary storage, documentation, transport, treatment, recovery and final disposal, both offshore and onshore, in order to ensure traceability and control throughout the waste management chain.

Primary objectives of this WMP are to:

- Ensure safe, environmentally sound and legally compliant management of all waste streams generated by the Project, minimising environmental impacts to the marine and coastal environment.
- Provide clear roles, responsibilities and governance (onboard and onshore) for waste segregation, temporary storage, documentation, transport, treatment, recovery and final disposal.
- Establish procedures and operational controls for classification, quantification, monitoring, reporting and recordkeeping of hazardous and non-hazardous wastes.
- Promote waste minimisation, reuse and recovery in line with the waste hierarchy (prevention, reuse, recycling, recovery, disposal) and applicable national and EU legislative requirements, and to integrate Best Available Techniques (BAT) and industry guidance where applicable.
- Ensure personnel competence and awareness through training, inspections and audits, and provide a mechanism for continuous improvement of waste management performance during the project lifecycle.

1.2 Project Description

Energean Hellas Ltd (Operator), together with its partners ExxonMobil Exploration and Production Greece (Crete) B.V. and HelleniQ Upstream West Kerkyra S.A., proposes to drill **a single offshore exploration well, named Asopus - 1, in Block 2 of the Ionian Sea, offshore western Greece, in 2027.**

Table 1-1: Coordinates and Water Depth of proposed Asopus-1 exploration well

WELL	LEASE AGREEMENT	LATITUDE	LONGITUDE	WATER DEPTH
Asopus-1	Block 2	39° 37' 25.92" N	18° 57' 28.51" E	~ 840 m

¹ Hereinafter referred to as the “Project”

The objective of the proposed activity is to evaluate subsurface geological formations and assess the potential presence of hydrocarbons. The well will be drilled using a mobile offshore drilling unit (MODU), specifically the Stena DrillMAX drillship, which is purpose-designed for deepwater drilling operations.

The proposed activity is temporary and limited in scope, comprising the drilling, evaluation, and subsequent plugging and abandonment of the exploration well. The Project does not include hydrocarbon production, well testing, flowback or flaring activities. If hydrocarbons are identified, any further appraisal or development activities would be subject to separate permitting and environmental assessment processes.

The exploration drilling campaign is structured into three consecutive operational phases, managed across both offshore locations and onshore logistics bases:

- **Mobilisation Phase:** consists primarily of mobilisation, temporary installation and operational preparation activities. This phase includes readiness of the MODU and support vessels, temporary configuration of onshore support areas, delivery of drilling materials and equipment, and establishment of logistics, storage, safety and waste handling arrangements required for the drilling campaign.
- **Drilling Phase:** The operation phase consists of continuous offshore drilling and logistics support, conducted on a 24-hour/day, 7-day/week basis. The offshore unit will remain on station only for the time required to complete drilling, well evaluation and permanent plugging and abandonment. During operations, the total persons on board may reach up to 180 personnel on the drillship, while support vessels typically carry 12–18 personnel each.
- **Decommissioning Phase:** Involves well abandonment, offshore demobilisation and removal of all temporary support components. Onshore, all portable office units, temporary storage fixtures, and waste streams are completely removed to restore the areas at the port and airport to their original conditions. As part of the abandonment design, the wellhead will remain in situ on the seabed. Retention of the wellhead avoids additional seabed intervention and emissions associated with recovery activities and is consistent with the abandonment approach assessed for the Project.

The **well construction sequence** is defined by the indicative casing schedule presented in Table 1-2, which sets out the sections, casing sizes, drilling fluid systems, and approximate depths. Final casing setting depths and well design parameters will be confirmed during detailed well planning and within the approved NoWO.

Table 1-2: Indicative well casing plan for Asopus-1 Base - Case

NO.	SECTION NAME	DRILLING FLUID	HOLE SIZE		CASING SIZE		DEPTH BELOW SEABED	LENGTH OF HOLE SECTION
			IN	MM	IN	MM	M MD	M
1	36-in Conductor Jetting	Seawater / WBM	-	-	36	914	±70	±70
2	26-in Hole x 20-in Surface Casing	Seawater / WBM	26	660	20	508	±730	±660
3	17-1/2-in Hole x 13-5/8-in Intermediate Casing	WBM	17-1/2	444	13-5/8	346	±1,212	±482
4	12-1/4-in Hole x 9-5/8-in Intermediate Liner	WBM	12-1/4	311	9-5/8	245	±2,407	±1,195
5	8-1/2-in Hole	WBM	8-1/2	216	-	-	±3,750	±1,343

Based on the current well design, the **drilling sequence** comprises:

- Mobilise the drilling rig within the operational area. Prepare to start drilling (spud).
- Jet the 36-in conductor.
- Drill ahead the 26-in hole section. Run and cement the 20-in surface casing.
- Run the BOP on the marine riser.
- Drill the 17-1/2-in hole section. Run and cement the 13-5/8-in intermediate casing.
- Drill the 12-1/4-in hole section - this section has a contingent wireline logging programme.
- Run and cement the 9-5/8-in liner.
- Drill the 8-1/2-in hole section. Conduct wireline logging to evaluate the primary target.
- Following formation evaluation, permanently plug and abandon the well using the approved abandonment barriers. The wellhead will remain in situ, and temporary Project equipment will be removed from the seabed in accordance with the final abandonment programme.

The program reflects a conservative exploration design based on current geological understanding. The design and methods may be revised following detailed engineering during the actual well construction. Given the exploration nature of the location, it should be noted that there may be contingency activities such as sidetrack drilling, re-drilling sections and re-spudding of a well.

Well testing, flowback, and flaring are not included within the scope of the Project assessed in the ESIA. No produced hydrocarbons, formation water, or reservoir fluids will be intentionally flowed back to the drillship as part of the proposed activities. Well-construction returns will be managed through the MODU circulation, treatment and well-control systems. Small formation-fluid samples may be recovered in sealed downhole sampling chambers as part of formation evaluation and managed in accordance with applicable sampling and laboratory procedures.

The offshore operation will be supported by routine marine and aviation logistics, including helicopter operations from Corfu Airport and platform supply vessels (PSVs) operating along established navigation routes between the drillship and an existing onshore supply base at the port of Igoumenitsa. These support activities do not require new construction or modification of coastal or onshore infrastructure.

The supply base (39° 29'06.4"N 20° 15'31.7"E) will function solely as a logistics interface between onshore services and offshore operations. It will be used for the storage, staging, and loading or unloading of equipment, materials, consumables, and wastes associated with the Asopus-1 drilling campaign. Supply base activities will be conducted in accordance with existing port operating procedures and applicable health, safety, and environmental requirements. Its use does not require the construction of new infrastructure, expansion or modification of existing port facilities, or dredging or other seabed works within the harbour area. No liquid mud plant (LMP) will be required or installed for the proposed exploration activities. Waste management facilities will be provided for the temporary handling and segregation of domestic, organic and operational waste generated both at the Supply Base and by supply vessels. Waste handling, storage and disposal practices will be undertaken in accordance with applicable port requirements, EU/national legislation, and MARPOL requirements.



Figure 1-1: Indicative Shore Base Layout with Operational Zoning

The Asopus-1 exploration drilling campaign is planned to take place in 2027, with a planned start window in the first quarter of 2027 (Q1 2027), subject to regulatory approvals, contractor availability, and project readiness. Where practicable, the activity is planned to be undertaken outside the peak tourism season.

Once the drillship arrives at the operational area, drilling and associated activities will be carried out continuously, **24 hours per day, 7 days per week**, to ensure safe and efficient operations. The drillship will remain on location only for the period required to complete drilling, formation evaluation, and plugging and abandonment of the well.

The **offshore campaign** is expected to last approximately **57 days for a dry well or 67 days if hydrocarbons are encountered**, including drilling, formation evaluation and permanent plugging and abandonment. The ESIA assesses a maximum offshore duration of 90 days to accommodate delays and operational contingencies. Preparatory mobilisation, shore-base establishment, demobilisation and close-out activities may occur outside the offshore campaign period, as described and quantified separately in the applicable Project phases.

All offshore activities will cease once the exploration program is completed and the drillship departs the site.

2 Waste Management Strategy

The Waste Management (WM) Strategy for the Project has been specifically developed to address the operational characteristics and waste generation profiles of the Project. Building on foundational waste management principles, the strategy is tailored to the Project's activities. It focuses on integrating prevention, reuse, separation, and recycling within the Project's operations to minimize environmental impact while maintaining operational efficiency and compliance.

2.1 Waste Management Principles

The WM strategy is grounded in internationally recognized principles, adapted to the Project's context as follows:

Waste Hierarchy:

At the core of the strategy is the waste hierarchy, which prioritizes waste prevention and re-use as the most preferred options. These are followed by recycling (including composting), then recovery methods such as energy recovery. Disposal, particularly through landfilling, is considered only as a last resort.



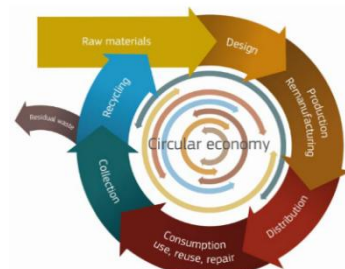
Expanding the "R" Principles

Traditionally, waste management followed the "3Rs" (Reduce, Reuse, Recycle). This approach has evolved to include the "7Rs" (Rethink, Refuse, Reduce, Reuse, Repair, Regift, Recycle) for a more comprehensive strategy. Some models further expand this to the "10Rs": Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture, Repurpose, Recycle, and Recover. Adopting these frameworks helps maximize resource efficiency and minimize waste throughout the project lifecycle.



Circular Economy:

The circular economy model addresses global challenges such as climate change, biodiversity loss, waste, and pollution. It emphasizes the efficient use of resources, prioritizing renewable inputs, maximizing product usage and lifespan to extract maximum value, and recovering or reusing by-products and waste to create new materials or products.



Green Growth and Circular Economy:

Managing the entire life cycle of natural resources - from extraction, design, and manufacturing to end-of-life disposal - is fundamental to green growth. This approach encourages smarter product design, enabling repair, re-use, remanufacturing, and recycling, ultimately supporting a resource-efficient and circular economy where nothing is wasted.

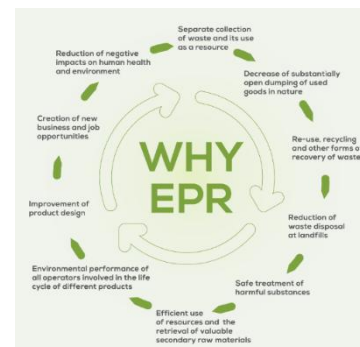


Sustainable Growth:

- Resource efficiency: Using resources more efficiently for a greener, more competitive economy.
- Eco-innovation: Enabling green growth and the transition towards a more circular economy.
- Raw Materials: Ensuring that the use of raw materials does not deplete the planet's resources.
- Production: Promoting greener products and supporting greener companies and organisations.
- Consumption: Providing transparent information to consumers enabling them to make greener choices.
- Waste prevention and management: Reducing waste and improving waste management.

Extended Producer Responsibility:

Producers and all entities in the product chain (manufacturers, processors, traders, sellers, importers, etc.) bear the primary responsibility for minimizing the environmental impact of products and packaging. EPR requires producers to finance the prevention, collection, re-use, recycling, and responsible end-of-life disposal of their products.



Polluter-Pays Principle:

The costs of waste management, including costs for the necessary infrastructure and its operation, should be borne by the original waste producer or by the current or previous waste holders.

Proximity Principle:

Enabling disposal or waste recovery in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, to ensure high level of protection for the environment and public health.

Precautionary Principle:

In order to avoid the threat or danger to the environment deriving from MSW, measures are implemented even if full scientific certainty is not available.

Sustainable Systems:

Develop systems to be adaptable, flexible, scalable, resilient, and appropriate to local ecosystem limits.

Closed Loop Systems:

Design systems to be closed loop rather than linear in their use of resources.

2.2 Waste Management Legal and Regulatory Framework

The Waste Management Legal and Regulatory Framework is provided in the following section. Specifically, §2.2.1 provides an overview of the relevant waste legislation. Section §2.2.2, titled "Provisions and Constraints," details the specific legal obligations and compliance requirements that apply directly to the Project's operations. All legal and regulatory provisions listed in §2.2.2 have been considered for the formulation of the WM Design. Together, these sections establish the mandatory regulatory foundation that guides the project's waste management planning and operations, ensuring environmental protection, and public health.

2.2.1 Overview

The Waste Management (WM) framework for the Project operates under a dual-jurisdictional model, necessitating a seamlessly integrated compliance strategy that bridges international maritime treaties with national statutory provisions. The regulatory matrix detailed in the following subsections interacts dynamically across the lifecycle of every waste stream generated throughout the campaign:

- **The Regulatory Interface:** While the offshore phase of the campaign operates outside the scope of national waste management laws, it is strictly bound by regional and international marine conventions. These treaties dictate exactly what can be treated or lawfully discharged at sea and what materials are strictly prohibited from marine discharge.
- **The Onshore Transition:** The moment any offshore waste is transferred to a support vessel and brought to port, it triggers the statutory framework of national WM laws and decisions. Offloading operations must strictly utilize approved Port Waste Reception Facilities (PRFs) governed by national port decrees, transitioning the waste entirely into the national regulatory domain.
- **Downstream Compliance:** Once on land, the storage, manifest tracking, logistics, and final treatment, disposal or recycling of this waste fall under the strict oversight of national WM legal framework.

The comprehensive legal and regulatory framework governing and affecting WM activities across the Project consists of the following:

Overarching legal and regulatory framework (Onshore Scope)

- The Environmental Terms of the Project
- Law 4819/2021 (GG 129/A/23.07.2021) Integrated Framework for Waste Management - Implementation of Directives 2018/851 and 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste and Directive 94/62/EC on packaging and packaging waste, organization of the Hellenic Recycling Agency and other relevant provisions, as amended
- Law 5151/2024 (GG/A/173/4.11.2024) Modernization of Waste Management Framework, Energy Saving, and Development of Energy Projects
- Law 4042/2012 (GG 24/A/13.2.2012) Protection of the environment through criminal law - Harmonization with Directive 2008/99/EC - Waste Production and Management Framework - Harmonization with Directive 2008/98/EC - Regulation of issues related to the Ministry of Environment, Energy and Climate Change, as amended
- Law 1650/1986 (GG 160/A/16.10.1986) on the protection of the environment, as amended

- **JMD 3122.3-15/71164/2021/2021 (GG 4790/B/18.10.2021):** Transposition of European Directive (EU) 2019/883 on port reception facilities for the delivery of waste from ships, amending Directive 2010/65/EU and repealing Directive 2000/59/EC.

Strategic (National and Regional) Waste Management Plans

- **Ministerial Council Act 39/31.08.2020 (GG 185/A/29.09.2020):** National Waste Management Plan (NWMP), as amended by Ministerial Council Act 5 (GG 94/A/18.04.2023).
- **JMD YPEN/DDA/124219/1717/2024 (GG B/6412/22.11.2024):** Approval of the Revised National Hazardous Waste Management Plan (NPHWM).
- **JMD 61490/5302 (GG 4175/B/23.12.2016):** Regional Waste Management Plan (PESDA) of the Epirus Prefecture. This plan remains fully in force and legally binding until the newly approved 2026 PESDA is officially published in the Government Gazette.
- **Local Solid Waste Management Plan** of the Municipality of Igoumenitsa, 2022.

International Maritime Conventions and Marine Pollution Framework (Offshore Scope)

- **The MARPOL Convention (73/78):** International Convention for the Prevention of Pollution from Ships, incorporated into Greek Legislation via Law 1269/1982 (GG 89/A/21.07.1982), as amended, governing operational discharges under:
 - **Annex I:** Regulations for the Prevention of Pollution by Oil (Bilge & machinery space runoff).
 - **Annex IV:** Regulations for the Prevention of Pollution by Sewage from Ships.
 - **Annex V:** Regulations for the Prevention of Pollution by Garbage from Ships (Plastics and food waste²).
- **The BWM Convention 2004:** International Convention for the Control and Management of Ships' Ballast Water and Sediments, ratified by Greece under Law 4470/2017 (GG 65/A/08.05.2017) and its amendments.
- **The Barcelona Convention and its Offshore Protocol:** Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean, along with its specific *Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil*. The Barcelona Convention, its amendments, and protocols were ratified by Greece through Laws 855/1978, 1634/1986, 3022/2002 and 3497/2006.
- **The London Convention and London Protocol:** Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, ratified by Greece under Law 1147/1981 (GG 110/A/23.04.1981).
- **Law 3983/2011 (GG 144/A/16.06.2011):** National Strategy for the Protection and Management of the Marine Environment – Harmonisation with Directive 2008/56/EC (Marine Strategy Framework Directive), as amended.

Joint Ministerial Decisions (JMD) and Presidential Decrees (PD) for Specific Waste Streams

- **JMD 114218/1997 (GG B 1016/17.11.1997)** Framework for Specifications and General Municipal Solid Waste Management Programs, as amended
- **JMD 7589/731/2000 (GG B 514/11.4.2000)** Measures and Conditions for Managing Polychlorinated Biphenyls (PCBs) and Polychlorinated Terphenyls (PCTs)

² Art. 3, Law 4819/2021: Food waste means all food as defined in Article 2 of Regulation (EC) No 178/2002 of the European Parliament and of the Council that has become waste.

- JMD 18083/1098/E.103/2003 (GG B 606/15.5.2003) Disposal/Decontamination Plans for PCB-Containing Equipment - General Guidelines for Collection and Disposal of PCB Equipment and Waste per Article 7 of JMD 7589/731/2000
- PD 82/2004 (GG A 64/2.3.2004) Measures, Conditions and Program for Alternative Management of Waste Oils (replacing JMD 98012/2001)
- PD 109/2004 (GG A 75/5.3.2004) Measures and Conditions for Alternative Management of End-of-Life Vehicle Tires and Related Program
- PD 117/2004 (GG A 82/5.3.2004) Measures, Conditions and Program for Alternative Management of Waste Electrical and Electronic Equipment (WEEE), in compliance with Directives 2002/95/EC (RoHS) and 2002/96/EC (WEEE), as amended
- PD 116/2004 (GG A 81/5.3.2004) Measures, Conditions and Program for Alternative Management of End-of-Life Vehicles (ELVs), Used Spare Parts and Deactivated Catalytic Converters, per Directive 2000/53/EC, as amended by JMD 42666/1345/E103/2013 (GG B 1879/1.8.2013), as amended
- PD 15/2006 (GG A 12/3.2.2006) Amendment of PD 117/2004 per Directive 2003/108/EC amending WEEE Directive 2002/96/EC
- JMD 13588/725/2006 (GG B 383/28.3.2006) Measures, Conditions and Restrictions for Hazardous Waste Management per Directive 91/689/EEC, as amended
- Law 3854/2010 (GG A 94/23.6.2010) Amendment of Packaging and Alternative Management Legislation and Establishment of National Organization for Alternative Management of Packaging and Other Products (EOEDSA), as amended
- JMD 36259/1757/E103/2010 (GG B 1312/24.8.2010) Measures, Conditions and Program for Alternative Management of Construction and Demolition Waste (C&DW), as amended
- JMD 41624/2057/E103/2010 (GG B 1625/11.10.2010) Measures, Conditions and Program for Alternative Management of Waste Batteries and Accumulators per Directives 2006/66/EC and 2008/103/EC, as amended
- JMD 146163/2012 (GG B 1537/8.5.2012) Measures and Conditions for Healthcare Waste Management
- JMD 36060/1155/E.103/2013 (GG B 1450/14.6.2013) Framework for Integrated Prevention and Control of Pollution from Industrial Activities per Directive 2010/75/EU (IPPC), as amended
- JMD H.P. 23615/651/E.103/2014 (GG B 1184/9.5.2014) Rules, Conditions and Requirements for Alternative Management of WEEE per Directive 2012/19/EU, as amended
- JMD 56366/4351/2014 (GG B 3339/12.12.2014) Specifications for Mechanical-Biological Treatment of Mixed Municipal Waste and Output Material Characteristics per Article 38(1)(b) of Law 4042/2012
- JMD 62952/5384/2016 (GG B 4326/30.12.2016) Approval of National Plan for Hazardous Waste Management (NPWHM) per Article 31 of Law 4342/2015
- JMD 41848/1848/2017 (GG B 3649/16.10.2017) Amendment of JMD 146163/2012 on Healthcare Waste Management
- Law 4736/2020 (GG A 200/20.10.2020) Transposition of Directive (EU) 2019/904 on Reduction of Single-Use Plastics Impact, as amended
- Circular YPEN/DDA/8437/176/28.1.2021 Collection and Transport of Non-Hazardous Waste per Article 36(4) of Law 4042/2012 as amended by Law 4685/2020 (corrected 9.2.2021)

- JMD YPEN/DDA/81490/1650/2021 (GG B 4382/22.9.2021) Transposition of Directive (EU) 2018/849 amending WEEE Directive 2012/19/EU - Amendment of JMD H.P. 23615/651/E.103/2014
- JMD YPEN/DDA/81492/1651/2021 (GG B 4382/22.9.2021) Transposition of Directive (EU) 2018/849 amending Batteries Directive 2006/66/EC - Amendment of JMD 41624/2057/2010
- JMD YPEN/DDA/90439/1846/2021 (GG B 4514/30.9.2021) Measures and Conditions for Sanitary Landfilling per Directive 99/31/EC as amended by Directive (EU) 2018/850
- JMD YPEN/ΔΔΑ/5632/128/2023 (GG B 1245/15.3.2023) Technical Specifications for Waste Treatment Facilities
- JMD YPEN/DDA/124219/1717/2024 (GG B 6412/22.11.2024) Approval of Revised National Plan for Hazardous Waste Management

2.2.2 Provisions and Constraints

According to the WM legal and regulatory framework, the waste management system of the Project strictly adopts, implements, and fully complies with the following primary legal provisions and constraints:

|| PAYT System

Legal and regulatory framework: As stipulated by Art. 37 of Law 4819/2021

Provisions/constraints: Promote source separation and recycling, given the "pay as you throw" (PAYT) system was introduced to the Integrated Framework for Waste Management (National Law 4819/2021) according to which waste producers shall be charged based on the actual amount of waste generated by them.

To be considered, not yet implemented by municipal entities/authorities involved in waste management.

In this context, this is NOT a requirement per se but a note to be considered to promote waste prevention, source separation and recycling to minimise waste management costs.

|| Source separation of paper, metals, plastics, glass, and textiles

Legal and regulatory framework: As stipulated by Art. 25 of Law 4819/2021

Provisions/constraints: Set up separate collection³ at least for paper, metal, plastic and glass, and, by 1 January 2024, for textiles at the national level.

Exceptionally, derogations are allowed, provided that at least one of the following conditions is met:

- (a) collecting certain types of waste together does not affect their potential to undergo preparing for re-use, recycling or other recovery operations in accordance with Article 4 and results in output from those operations which is of comparable quality to that achieved through separate collection;
- (b) separate collection does not deliver the best environmental outcome when considering the overall environmental impacts of the management of the relevant waste streams;
- (c) separate collection is not technically feasible taking into consideration good practices in waste collection;

³ Art. 3, Law 4819/2021: 'separate collection' means the collection where a waste stream is kept separately by type and nature to facilitate a specific treatment.

(d) separate collection would entail disproportionate economic costs considering the costs of adverse environmental and health impacts of mixed waste collection and treatment, the potential for efficiency improvements in waste collection and treatment, revenues from sales of secondary raw materials as well as the application of the polluter-pays principle and extended producer responsibility.

|| Source separation of Used Cooking Oil

Legal and regulatory framework: As stipulated by the National Waste Management Plan (GG 185/A/29.9.2020)

Provisions/constraints: Source separation of Used Cooking Oil (UCO), temporary storage and delivery to a waste collection/management service provider should be provided.

|| Source separation of WEEE, batteries and accumulators, and waste oils

Legal and regulatory framework: As stipulated by Art. 7 and 10 of Law 4819/2021 and JMD 41624/2057/2010 (GG/B' 1625/11-10-2010)

Provisions/constraints: Foresee separate collection and temporary storage of WEEE, batteries and accumulators, and waste oils and delivery to an appropriate permitted waste collection/management service provider for proper treatment through the Alternative Management Systems established in Greece under the EPR principle.

The legal framework ensures that producers finance and organize the separate collection, temporary storage, and proper treatment of these wastes through authorized Alternative Management Systems, in line with the Extended Producer Responsibility principle.

Established Extended Producer Responsibility (EPR) Schemes: Waste from Electrical and Electronic Equipment (WEEE), Batteries and Accumulators, Packaging Waste, Construction and Demolition Waste (CDW), End-of-Life Vehicles, Waste Tyres and Waste Oils.

In this context, this is not a requirement per se but a note to be considered to promote waste prevention, source separation and recycling in order to minimise waste management costs.

|| Source separation of hazardous waste, including hazardous municipal waste

Legal and regulatory framework: As stipulated for hazardous waste, including hazardous municipal waste by:

- Law 4819/2021, Art. 46, "Integrated Framework for Waste Management".
- National Waste Management Plan MD Act 39 31.8.2020 (GG 185/A/29.9.2020).
- JMD 13588/725/2006 (GG 383/B/28.3.2006) "Terms, conditions and restrictions for hazardous waste management"
- MD 62952/5384/2016 (GG 4326/B/30.12.2016) "Approval of the National. Hazardous Waste Management Plan (ESDEA)"

Provisions/constraints: Hazardous waste should be separately collected at source and recovery/disposal operations should be applied in accordance with the applicable legislation.

|| Source separation of biowaste

Legal and regulatory framework: As stipulated by Art. 50 of Law 4819/2021

Provisions/constraints: Biowaste⁴ is either separated and recycled at source or is collected separately and is not mixed with other types of waste, in order to encourage recycling, including composting and digestion, of bio-waste in a way that fulfils a high level of environment protection and results in output which meets relevant high-quality standards. Waste with similar biodegradability and compostability properties which comply with relevant European standards or any equivalent national standards for packaging recoverable through composting and biodegradation, may be allowed to be collected together with bio-waste.

|| Non-drilling discharges regulated by MARPOL

Legal and regulatory framework: As stipulated by MARPOL Annex I, Annex IV, Annex V

Provisions/constraints:

Machinery space bilge water / oily deck drainage: Discharge overboard only when the unit/vessel is en route, outside prohibited areas, and oil content of undiluted effluent is ≤ 15 ppm; any effluent > 15 ppm is automatically diverted/retained for shore disposal; no visible sheen at sea surface.

Treated sewage: Discharge of treated sewage permitted only when the approved plant is operating and effluent quality meets IMO performance standards and flag state criteria; otherwise retained on board for shore reception.

Untreated / non-compliant sewage (contingent): No routine discharge of untreated or non-compliant sewage; any exceptional discharge only under MARPOL Annex IV conditions (vessel en route, sufficient distance from land, moderate rate, administration approval)

Food waste: In the Mediterranean Special Area, only ground food waste (≤ 25 mm) may be discharged and only beyond the distances from land specified in Annex V; operational policy is to maximise landing of food waste ashore and avoid discharges where practicable; no discharge of packaging/plastics with food waste.

Other garbage (plastics, domestic and operational waste): No discharge of plastics or other garbage at sea; all such wastes retained on board and landed to authorised reception facilities

Cooling water: Discharged as clean, non-oily water with no visible sheen, discoloration or floating solids; must not contain oil or harmful substances in quantities that would cause pollution.

Desalination brine (evaporator + ROs): Discharged locally at the rig as a clean, high salinity stream without oil or added harmful substances; expected rapid dispersion at open sea location (~44 km from closest shoreline); no visible pollution.

Waste oils spent chemicals and liquid hazardous wastes: No discharge to sea under any circumstances; 100% of these wastes are transported to authorised onshore treatment or disposal facilities.

|| Non-drilling discharges regulated by Barcelona Convention - Offshore Protocol

Legal and regulatory framework: As stipulated by Barcelona Convention and Offshore Protocol

Provisions/constraints:

⁴ Biowaste means biodegradable garden and park waste, food and kitchen waste from households, offices, restaurants, wholesale, canteens, caterers and retail premises and comparable waste from food processing plants. This category of waste is subject to specific management requirements, including separate collection and recycling, such as composting or anaerobic digestion, to ensure high environmental protection standards and produce high-quality products (Article 22 of Directive 2008/98/EC, as amended by Directive (EU) 2018/851). In Greece, these provisions are incorporated into national law through N. 4819/2021, which provides a comprehensive framework for waste management, aligning with EU directives

Cooling / service water with biocide or corrosion inhibitor (if used): Residual concentrations of biocides/additives in discharge kept within manufacturer, flag state and permit defined limits and at levels not expected to cause harmful effects; no visible pollution at discharge

|| Non-drilling discharges regulated by BWM Convention Regulations

Legal and regulatory framework: As stipulated by BWM Convention Regulations B 1, D 1, D 2 and D 3; approved Ballast Water Management Plan and Ballast Water Record Book.

Provisions/constraints:

Ballast water: Under normal operations, ballast water discharged only after treatment to meet the D 2 performance standard for living organisms; in exceptional circumstances, sequential ballast water exchange to the D 1 standard may be used as a contingency measure in approved offshore areas, in line with the vessel's Ballast Water Management Plan

|| Extractive waste generated from offshore exploration, extraction, and processing of mineral resources regulated by Barcelona Convention - Offshore Protocol

Legal and regulatory framework: -

Provisions/constraints:

Extractive waste generated from offshore exploration, extraction, and processing of mineral resources is excluded from the scope of Law 4819/2021 and Joint Ministerial Decision 39624/2209/E103 (Government Gazette B/2076/25.9.2009) [Measures, conditions, and restrictions for the management of waste from the extractive industries, in compliance with the provisions of Directive 2006/21/EC of 15 March 2006 "on the management of waste from extractive industries and amending Directive 2004/35/EC" of the Council of 15 March 2006].

In accordance with the legally binding European List of Waste (ELW) (established under EU Decision 2000/532/EC), extractive waste is formally classified under Chapter 01 (Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals).

Consequently, the offshore management, treatment, and permissible marine discharges of these streams are governed strictly by regional and international frameworks (The London Convention and London Protocol, The Barcelona Convention and its Offshore Protocol)

|| Drilling discharges regulated by Barcelona Convention - Offshore Protocol

Legal and regulatory framework: As stipulated by Barcelona Convention and Offshore Protocol

Provisions/constraints:

The Protocol establishes specific controls on the use and discharge of drilling muds and associated cuttings, recognizing them as a significant source of marine pollution. Operators are required to minimize their environmental impact using less harmful substances and proper treatment. Discharges containing oil-based muds or hazardous substances are subject to strict limitations or prohibitions, and monitoring of their composition and quantities is mandatory.

Chemicals used in drilling materials and fluids shall be approved by the competent authority. The producer/supplier shall provide complete technical data sheets and hazard characteristics. Any use, discharge or disposal of chemicals

included in the restrictive or prohibitive lists of the Protocol shall be permitted only under the applicable authorisation requirements and subject to the specific monitoring and reporting conditions.

Drilling fluids shall be distinguished between water-based muds and oil-based muds. Oil-based muds and drill cuttings contaminated with toxic or prohibited substances shall not be discharged into the sea. Such streams shall be collected, treated and transferred to onshore facilities for appropriate management or final disposal.

Permissible discharge limits for oil contamination:

- For machinery space drainage, the maximum permitted oil content shall be 15 mg/l in undiluted effluent, as provided under Annex V of the Protocol.
- For produced water, the average oil content shall not exceed 40 mg/l in any calendar month, with a maximum instantaneous limit of 100 mg/l.

The discharge into the marine environment of fluids or drill cuttings containing substances classified as particularly hazardous or toxic under the Annexes of the Protocol is prohibited. For certain categories of substances, a special permit may be required, following assessment of environmental risk and compliance conditions.

Operators shall give preference to less harmful or biodegradable alternative fluids and chemicals, applying the principles of prevention and pollution minimisation in the planning and execution of drilling operations.

Systematic monitoring of discharge composition and quantities shall be ensured, together with the maintenance of records on volumes and chemical data, and the submission of periodic reports to the competent authorities in accordance with the Protocol requirements.

Waste streams that are not permitted to be discharged into the sea shall be delivered to licensed onshore treatment or disposal facilities, in compliance with applicable national and international standards.

Any discharge or derogation from the general prohibitions require the issuance of the relevant permit by the competent administration and compliance with any applicable notification or consultation obligations with the Parties to the Protocol, where required.

The operator shall maintain documentation demonstrating that design procedures, chemical selection, mitigation measures, monitoring and disposal arrangements comply with the requirements of the Protocol and shall make such documentation available to the inspection authorities upon request.

|| Drilling discharges regulated by Mediterranean Offshore Guidelines and Standards: Draft guidance on the disposal of oil and oily mixtures and on the use and disposal of drilling fluids and cuttings

Legal and regulatory framework: As stipulated by IMO 2019 / REMPEC/WG.45/13/2 Mediterranean Offshore common standards and guidance adopted under the Barcelona Convention framework

Provisions/constraints: The applicable framework requires drilling operations to be planned and conducted so as to prevent, reduce and control pollution from drilling fluids, drill cuttings, oil and oily mixtures, applying the best available techniques and environmentally effective practices. Water-based muds should be preferred wherever technically feasible, whereas oil-based muds, synthetic-based muds and other chemically enhanced fluids shall be subject to stricter control and environmental assessment. Drill cuttings and oily residues shall be managed according to their contamination level and residual oil content, with sea discharge allowed only where the applicable operational criteria are met, while storage, handling and disposal arrangements shall prevent leakage, spillage and uncontrolled release to the marine environment.

Water-Based Drilling Fluids (WBDF) & Cuttings: Discharge into the sea is permitted only upon prior written authorization/licensing by the competent national authority. Chemical additives must be of low toxicity and pre-approved. Strict heavy metal concentration limits are enforced for stock barite: maximum 1 mg/kg dry weight for Mercury (Hg) and maximum 3 mg/kg dry weight for Cadmium (Cd).

Non-Water Based Drilling Fluids & Cuttings: Absolute prohibition of discharge into the sea for oil-based muds and cuttings (Oil-Based Fluids/Cuttings). For synthetic muds (Synthetic-Based Fluids), the discharge of cuttings is permitted only if the synthetic fluid content on dry cuttings is below the designated threshold (typically < 1%). All surplus fluids and contaminated cuttings must strictly be transported to shore (skip-and-ship) or disposed of via downhole injection.

|| Electronic Waste Registry (HMA) and Waste Tracking

Legal and regulatory framework: As stipulated by Art. 53 of Law 4819/2021 and relevant Ministerial Decrees.

Provisions/constraints: The Project/Operator must be officially registered in the Hellenic Electronic Waste Registry (HMA) of the Ministry of Environment and Energy. Every waste stream generated on board and transferred ashore to Greek ports must be systematically logged, and all shipments of hazardous and non-hazardous waste must be accompanied by official digital Waste Tracking Forms to ensure full traceability until final recovery or disposal.

2.3 Staff Awareness and Education

Effective waste management relies not only on technical systems but equally on informed, engaged, and responsible staff. This chapter outlines the critical components of the Staff Awareness and Education program designed to ensure understanding, compliance, and continuous improvement of waste segregation, handling, and collection processes throughout operations.

- **Mandatory Basic Training**

All relevant staff should receive basic training sessions. These sessions will cover the principles of waste segregation, correct use of color-coded bins, internal waste logistics, and essential health and safety protocols related to waste handling. Training content will be tailored to the specific roles and operational responsibilities of each staff group.

- **Signage and Visual Instructions**

Clear, multilingual signage and visual instructions will be installed prominently near all waste containers, waste storage areas, and transfer points to assist staff in proper segregation and handling practices. Visual aids will include pictograms, color codes, and step-by-step procedures to minimize contamination and errors.

- **Defined Responsibilities**

Effective implementation of the Waste Management during the Project's operational phase relies on clear assignment of roles and responsibilities among all involved stakeholders. This ensures coordinated efforts for waste prevention, source separation, collection, transportation, treatment, and continuous monitoring.

- **Performance Reviews and Follow-Up Training Programs**

Periodic audits should be conducted to assess compliance with segregation protocols, storage safety, and operational procedures. Review results will be communicated transparently with staff and will form the basis for follow-up training programs organized regularly to reinforce good practices; address identified gaps and introduce any updated regulations or methods.

- Emergency Response and Safety

A specific emergency response plan will be maintained for waste-related incidents (e.g., spillage, hazardous handling, contamination). Staff will be trained for timely, safe responses minimizing health and environmental risks.

- Monitoring Framework

Periodic audits form part of the performance monitoring and continuous improvement mechanism. The monitoring and improvement system includes the following components:

- **Regular Monitoring and Reporting:** Scheduled inspections and audits to assess waste segregation accuracy, collection efficiency, and adherence to handling protocols. Data on waste quantities, types, recycling rates, and disposal methods will be systematically recorded and reported.
- **Performance Indicators:** Specific key performance indicators (KPIs) such as rates of waste diversion from landfill, compliance with hazardous waste procedures, and participation rates in waste reduction initiatives will be defined and tracked.
- **Staff Training and Engagement:** Continuous training programs will be delivered to all relevant personnel, emphasizing best practices, regulatory updates, and roles in the waste management system. Feedback mechanisms should encourage staff input to identify operational challenges and improvement opportunities.
- **Periodic Review and Waste Management System Update:** The WM System should undergo formal reviews. These reviews would analyze monitoring results, audit findings, and stakeholder feedback to identify necessary adjustments and enhancements.
- **Corrective Actions:** Prompt implementation of corrective action plans will address non-compliance or underperformance, with follow-up audits verifying the effectiveness of these interventions.

2.4 Personal Protective Equipment (PPE)

During waste handling, appropriate safety measures shall be taken. Personnel involved in waste management shall be fully equipped with appropriate Personal Protective Equipment (PPE). The aforementioned equipment includes:

- Work overalls.
- Protective goggles.
- Gloves:
 - Rubber gloves shall be worn when handling hazardous waste.
 - Safety gloves shall be worn when handling non-hazardous waste.
- Mask:
 - Appropriate respiratory protection shall be used when dealing with hazardous waste (solid and liquid).
 - Suitable respiratory protection shall be used when dealing with non-hazardous waste.
- Safety boots (steel-toed).
- Safety helmet.

2.5 Strategic Pillars and Implementation Measures

The Waste Management (WM) goals of the Project are well-aligned with EU waste management principles, legal requirements, and the Project's overarching operational strategy. These goals demonstrate a strong commitment to minimizing environmental impact, maximizing resource efficiency, and advancing circular economy practices. By integrating waste reduction, reuse, and recycling within the Project's operations, the Project aims to set a benchmark for best practices in the drilling sector.

G1	Mitigate risks to the environment and human health through integrated planning, design, and operation of waste management systems
G2	Ensure that appropriate waste collection arrangements are in place for all anticipated project waste streams.
G3	Establish comprehensive source separation for key waste categories including paper/cardboard, metals, plastics, glass, biowaste, special waste streams and hazardous waste
G4	Promote the separate collection and responsible management of special and hazardous waste streams
G5	Implement dedicated separate waste collection systems that support efficient recycling and composting processes
G6	Develop and encourage waste prevention and circular economy practices, including reuse, repair, and lifecycle thinking, to minimize waste generation at the source
G7	Minimize landfill disposal by maximizing waste diversion through reuse, recycling, and recovery
G8	Reduce all discharges to land, water, and air—including greenhouse gases—that pose threats to planetary, human, animal, or plant health
G9	Establish robust tools and systems for recording, analyzing, monitoring, and making informed decisions on waste management issues
G10	Promote effective public awareness and education programs to enhance understanding and participation in waste management
G11	Increase waste management system efficiency by encouraging active involvement and partnerships with the private sector
G12	Ensure all personnel involved in waste management operations are fully protected against occupational hazards

To ensure that the Project's strategy is effectively executed, the high-level goals are structured into specific Strategic Pillars linked directly to targeted Implementation Measures. This framework bridges the gap between regulatory mandates and daily execution, establishing a clear roadmap for compliance, monitoring, and environmental performance.

STRATEGIC PILLAR & GOALS	PRIMARY IMPLEMENTATION MEASURES
P1: Risk Mitigation & Environmental Protection <i>G1: Mitigate risks to the environment and human health through integrated planning, design, and operation of waste management systems.</i> <i>G8: Reduce all discharges to land, water, and air—including greenhouse gases—that pose threats to planetary, human, animal, or plant health.</i>	• Integrated Planning & Design. • Chemical Substitution Strategy to eliminate high-hazard additives prior to procurement. • Discharge Controls & Monitoring. • Mandatory treatment of ballast water. • Drilling Discharges Control (Fluids & Cuttings). • Operational Shipboard Discharges Management. Automatic diversion of non-compliant effluent to dedicated holding tanks. • Absolute ban on sea discharge for Oil-Based Fluids and contaminated cuttings. • Prior written authorization by the competent national authority for Water-Based Fluids and cuttings discharge • Offshore / onshore waste separate collection and safe storage
P2: Full Logistics Coverage & Management G2: Ensure that appropriate waste collection arrangements are in place for all anticipated Project waste streams.	• Waste logistics and traceability arrangements will be maintained for Project waste from generation through transfer to the authorised receiving facility, in accordance with applicable documentation and reporting requirements. • Complete Lifecycle Oversight.
P3: Comprehensive Source Separation <i>G3: Establish comprehensive source separation for key waste categories including paper/cardboard, metals, plastics, glass, biowaste, special waste streams and</i>	• Source Segregation. • Dedicated and clearly labeled collection streams to maximize recycling and eliminate cross-contamination.

STRATEGIC PILLAR & GOALS	PRIMARY IMPLEMENTATION MEASURES
<i>hazardous waste.</i> G5: Implement dedicated separate waste collection systems that support efficient recycling and composting processes.	
P4: Extractive, Hazardous & Special Waste Management G4: Promote the separate collection and responsible management of special and hazardous waste streams.	• Hazardous waste isolation and deployment of dedicated, bunded, and weather-proof containment areas • Hazardous waste separate collection. • Secure Onboard/Onshore storage with continuous maintenance • Hazardous drilling waste containment utilizing the Skip-and-Ship model.
P5: Source Reduction & Circular Economy G6: Develop and encourage waste prevention and circular economy practices, including reuse, repair, and lifecycle thinking, to minimize waste generation at the source.	• Waste Prevention through strict procurement controls and absolute bans on targeted single-use plastic products. • Green Procurement protocols requiring supply chain vendors to utilize bulk packaging and reusable transit containers to minimize packaging waste at source.
P6: Landfill Diversion & Resource Recovery G7: Minimize landfill disposal by maximizing waste diversion through reuse, recycling, and recovery.	• Landfill Minimization utilizing dedicated onshore sorting infrastructure at Port Reception Facilities to maximize recovery rates. • Direct integration with certified Alternative Waste Management Systems and EPR Schemes for specialized streams like waste oils, tyres, batteries, WEEE and packaging.
P7: Traceability, Monitoring & Governance G9: Establish robust tools and systems for recording, analyzing, monitoring, and making informed decisions on waste management issues.	• Digital Traceability. • Data-Driven Decision Making. • Operational Auditing & KPIs. • Digital Traceability through direct, daily logging of all generated and transferred waste. • Data-Driven Decision Making using digital Waste Tracking Forms and manifests for every shipment from the offshore installation to the onshore base. • Operational Auditing and tracking of specific Key Performance Indicators.
P8: Workforce Engagement & Competence G10: Promote effective public awareness and education programs to enhance understanding and participation in waste management.	• Targeted Staff Training. • Multi-lingual Visual Controls. • Follow-Up Training Programs.
P9: Institutional & Market Synergies G11: Increase waste management system efficiency by encouraging active involvement and partnerships with the private sector.	• Private Sector Partnerships established with licensed, certified private waste management contractors and port reception facilities. • Contractor assurance and oversight through audits, inspections or other verification activities, as appropriate to contractor risk, contractual arrangements and regulatory requirements.
P10: Occupational Health & Waste Safety G12: Ensure all personnel involved in waste management operations are fully protected against occupational hazards.	• Mandatory PPE Enforcement ensuring all waste-handling personnel are fully equipped with work overalls, protective goggles, steel-toed safety boots, and safety helmets. • Task-Specific Safety Protocols.

3 Offshore Waste Classification, Quantification and Management

3.1 Offshore Waste Types

Offshore waste generated throughout the project's phases is classified into two primary categories: drilling waste and associated operational waste. In alignment with EU and national waste management legislation and maritime regulations, these waste streams are classified in accordance with the European List of Waste (ELW), as detailed in Table 3-1. Within this classification system, codes appended with an asterisk (*) denote waste streams categorized as hazardous. Detailed descriptions and inventories for each individual waste stream are provided in the subsequent sections.

Waste and discharges originating from the drilling unit and its associated support vessels are strictly governed by a comprehensive matrix of international, regional, and national statutory instruments. Management and disposal practices are designed to ensure full compliance with:

- The MARPOL Convention: The International Convention for the Prevention of Pollution from Ships - Annex I (Oil), Annex IV (Sewage), and Annex V (Garbage).
- The BWM Convention: The International Convention for the Control and Management of Ships' Ballast Water and Sediments, regulating the treatment and exchange of ballast water to protect marine biodiversity.
- The Barcelona Convention and its Offshore Protocol: The Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean along with its specific Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil.
- EU/ National Legislation (please. refer. to §2.2)

Table 3-1: Classification of offshore waste according to the ELW

ELW CODE	ELW DESCRIPTION
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 05	drilling muds and other drilling wastes
01 05 04	freshwater drilling muds and wastes
01 05 99	wastes not otherwise specified
13	OIL WASTES AND WASTES OF LIQUID FUELS (except edible oils, and those in chapters 05, 12 and 19)
13 02	waste engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
13 04	bilge oils
13 04 03*	bilge oils from other navigation (MARPOL Exempt Discharge)
14	WASTE ORGANIC SOLVENTS, REFRIGERANTS AND PROPELLANTS (except 07 and 08)
14 06	waste organic solvents, refrigerants and foam/aerosol propellants
14 06 03*	other solvents and solvent mixtures
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED

ELW CODE	ELW DESCRIPTION
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 07	glass packaging
15 01 10*	packaging containing residues of or contaminated by hazardous substances
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	wastes from electrical and electronic equipment
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	batteries and accumulators
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (except kitchen and restaurant wastes not arising from immediate health care)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste (MARPOL Exempt Discharge - Food wastes)
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 25	edible oil and fat (Cooking oil, MARPOL Annex V)
20 01 27*	paint, inks, adhesives and resins containing hazardous substances
20 01 29*	detergents containing hazardous substances
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (E-waste, MARPOL Annex V)
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35 (E-waste, MARPOL Annex V)
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	Plastics (Plastics, MARPOL Annex V)

ELW CODE	ELW DESCRIPTION
20 01 40	metals
20 03	other municipal wastes
20 03 01	mixed municipal waste (Domestic Waste, MARPOL Annex V)
20 03 99	municipal wastes not otherwise specified (MARPOL Exempt Discharge - sanitary wastewater, grey water)
MARPOL Operational Discharge from DrillMax⁵:	
N/A	ballast water, cooling water, brine from water maker (Evaporator/RO), boiler drain, drain system (deck runoff) ----- <i>Note: A rigorous regulatory distinction is maintained between waste streams and routine operational marine discharges generated onboard the Stena DrillMAX. In accordance with international maritime jurisprudence and European environmental law, high-volume operational liquid streams—specifically ballast water, machinery cooling water, desalination brine, and chemical-free boiler blowdown—are legally excluded from classification under the European List of Waste (ELW).</i> <i>The statutory boundary separating land-based waste frameworks from permitted maritime discharges is established under Article 2 of Directive (EU) 2019/883, transposed into Greek national legislation via Joint Ministerial Decision (KYA) 3123.1/81938/2022 (GG B' 6085/29.11.2022). Pursuant to Article 2(3) of the Directive, the definition of "waste from ships" is strictly limited to substances falling under the scope of Annexes I, II, IV, V, and VI of the IMO MARPOL 73/78 Convention that are intended for delivery to Port Reception Facilities (PRFs).</i>

The classification of waste as hazardous or non-hazardous, and, in particular, understanding when and under what circumstances waste is to be considered hazardous is a crucial decision in the entire chain of waste management from generation to final treatment. When a waste is correctly classified as hazardous, a number of important obligations are triggered, for instance on labelling and packaging, but also in terms of the available compliant treatment. It is noted that the classification of waste, shall be carried out in accordance with the provisions of the "Commission Notice on technical guidance on the classification of waste" (2018/C 124/01) (pl. ref. to §7), based on the Waste Framework Directive 2008/98/EC, which has been transposed into Greek legislation through Law 4819/2021 (GG 129/A/23.07.2021), and Regulation (EC)⁶ No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (CLP Regulation).

3.2 Drilling Waste and Discharges

Drilling waste constitutes the primary waste stream generated during the operational phase of the offshore drilling campaign. These operations inevitably generate extractive wastes, consisting primarily of drill cuttings and drilling mud (fluid). In accordance with the legally binding European List of Waste (ELW) (established under EU Decision 2000/532/EC), these categories are formally classified under Chapter 01 (Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals).

From a national regulatory perspective, extractive wastes resulting from offshore exploration, extraction, and processing of mineral resources are explicitly excluded from the scope of Greek Law 4819/2021 and Joint Ministerial Decision (JMD) 39624/2209/E103 (GG B/2076/25.9.2009) regarding "Measures, conditions, and

⁵ Operational marine discharges (specifically ballast water, machinery open-loop cooling water, desalination brine, rainwater drainage, and chemical-free boiler blowdown, as well as onboard-treated bilge, sewage, and food waste) are functionally managed and discharged subsea in strict accordance with the United Nations Convention on the Law of the Sea (UNCLOS 1982, Article 211), the IMO MARPOL 73/78 Convention (Annex I, IV, V), and the IMO BWM Convention 2004 (ratified by Greek Law 4470/2017).

⁶ Current consolidated version: 01/07/2026: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1272-20260701>

restrictions for the management of waste from the extractive industry, in compliance with the provisions of Directive 2006/21/EC of the Council of March 15, 2006".

Consequently, the offshore management, treatment, and permissible marine discharges of these streams are governed strictly by regional and international frameworks, including:

- The London Convention and London Protocol: Regulates the prevention of marine pollution from the dumping of wastes at sea.
- The Barcelona Convention and its Offshore Protocol: Governs environmental protections for exploration and exploitation activities on the Mediterranean continental shelf and seabed.

Under these applicable frameworks, drilling wastes are managed based on chemical composition. While Annex I of the Offshore Protocol (The "Black List") completely prohibits the offshore disposal of drilling materials contaminated with persistent oil residues or toxic compounds, non-hazardous water-based drilling muds (ELW 01 05 04) or authorized synthetic fluids may only be discharged if they meet predefined quality thresholds, ensuring high dilution and no adverse impact on the Mediterranean marine ecosystem. Any hazardous or oil-contaminated drilling muds and cuttings failing these criteria will follow a strict containment and onshore transfer protocol to certified receiving facilities.

3.2.1 Drill Cuttings and Drilling Discharges

Drilled cuttings will have 6-15% coating of drilling fluid. The Drilling Fluid is used to maintain hydrostatic pressure, transport rock cuttings to the surface, and lubricate, cool the drill bit, among other functions. All well sections will use low-toxicity water-based mud (WBM).

Although the UNEP/MAP Common Standards and Guidelines permit low-toxicity NADF in deeper sections with strict discharge controls, NADF will not be used or discharged for Asopus-1.

The drilling-fluid components are included in the Chemical Use Plan (CUP). Chemicals in the CUP are included to support specific drilling-fluid functions, including well-pressure control, wellbore stability, inhibition, viscosity, fluid-loss control and management of the temperature and geological conditions encountered during drilling. The CUP includes chemicals proposed for planned use and contingency chemicals that will be used only if required by the well conditions encountered. The inclusion of a chemical in the CUP does not necessarily mean it will be used.

Table 3-2 summarises anticipated discharges of drilling fluid and cuttings. The quantities are based on the current well design and drilling-fluid programme. The final well design and mud and cement programmes will be confirmed before drilling through the applicable well-planning and regulatory processes.

Table 3-2: Estimated Drilling Fluids and Cuttings

Hole Section / Mud Type	DISCHARGES WHILE DRILLING (CONTINUOUS)					BATCH DISCHARGE OF WBM AT END OF SECTIONS			
	Discharge Type, Location, Orientation	Interval Length (m)	Continuous discharge rate (m³/h)	Cuttings Discharge (MT)	WBM Discharge (MT)	Discharge Type	Batch Discharge rate (m³/h)	Emptying of Sand Traps Mud Discharge (MT)	Whole mud displacement WBM Discharge (MT)
36" Conductor Jetting with seawater, gel sweeps, and PAD mud	Continuous, discharged at seabed, vertically upwards	70	20.0	82.7	-	-	-	-	-
26" Hole Drilling x 20" Casing & Cement, with seawater, gel sweeps, and PAD mud		660	20.0	407.0	1317.7	-	-	-	-
17-1/2" Hole Drilling x 13-5/8" Casing & Cement, with WBM	Continuous for cuttings. Discharged 12m below sea level	482	14.3	152.1	101.7	Batch. Discharged 12m below sea level	76.3	80	414.2
12-1/4" Hole Drilling x 9-5/8" Liner & Cement, with WBM		1,195	14.3	212.9	111.7		76.3	80	131.7
8-1/2" Hole Drilling with WBM		1,343	7.2	87.8	43.5		76.3	40	155.4
Plug and Abandonment with WBM & seawater	-	-	-	-	-		76.3	80	1232.1
TOTAL				942.5	1574.6			280	1933.4

Notes: WBM = water-based mud, PAD = pump-and-dump mud, which is a type of water-based mud.

3.2.1.1 Riserless Section – Seawater and WBM

Seawater combined with high-viscosity gel sweeps will serve as the drilling fluid for the initial conductor jetting and 26-in surface-hole section, with discharge at the seabed. The gel sweeps will contain water-based additives required to provide the necessary viscosity and fluid properties during riserless drilling. Cuttings and water-based drilling fluids will be discharged at the seabed during the riserless sections. Up to approximately 490 tonnes of claystone and calcareous cuttings and approximately 1,318 tonnes of drilling fluids will be discharged during top-hole drilling.

The discharge of WBM and cuttings at the seabed during the riserless sections has been assessed against the applicable requirements of the Barcelona Convention Offshore Protocol and relevant UNEP/MAP standards and guidelines. The discharge quantities and predicted environmental effects are addressed in the corresponding impact-assessment sections of this ESIA.

3.2.1.2 Risered Section– WBM

After completing the riserless sections, a marine riser and a blowout preventer (BOP) stack are installed to connect the well to the MODU and enable a closed-circulating system. The MODU's primary solids control equipment, including shale shakers and a centrifuge, removes cuttings from mud before recirculating the fluid back to the well.

Intermediate and target-hole sections will be drilled with water-based mud. Different shaker screen mesh sizes will be installed to remove specific particle sizes, thereby optimising drilling fluid properties.

Under normal operating conditions, cuttings associated with WBM are not expected to contain free reservoir hydrocarbons at levels that would make them unsuitable for discharge and will be discharged in accordance with the applicable regulatory requirements. Discharged cuttings typically range from very fine particles of approximately 20 µm to coarse fragments of less than approximately 1 cm in diameter following separation from the drilling fluid. The rate of cuttings discharge generally decreases with increasing well depth due to progressively smaller hole diameter and changes in penetration rate. Discharge will be intermittent because active drilling will not occur continuously while the MODU is on location.

Cuttings are discharged 12 m below the water line, while drilling mud is recirculated. For the base-case well design, up to 453 tonnes of calcareous and carbonate-based cuttings and 1,158 tonnes of drilling fluids may be discharged on the well sections drilled with a riser in place. A further discharge of 1,312 tonnes of drilling fluid may be conducted during the well plug and abandonment process.

An LWD indication of a potentially hydrocarbon-bearing interval will inform monitoring and operational decision-making but will not, by itself, establish that the returned cuttings are hydrocarbon-contaminated. Where cuttings or drilling returns are identified as contaminated with reservoir hydrocarbons such that they are unsuitable for discharge under the applicable requirements, discharge of the affected material will cease. The affected cuttings and fluids will be contained onboard and transferred ashore for management at an authorised facility.

Actual discharge quantities may vary depending on the final well depth and the drilling conditions encountered. The contingency envelope includes potential additional WBM and cuttings associated with lost circulation, wellbore washout, re-spudding, sidetracking, re-drilling of individual sections and contingency casing strings.

3.2.1.3 Bulk Materials

Cement and barite are transported as dry bulk and pneumatically transferred from support vessels to MODU storage tanks using compressed air. Displaced air will be released through the tanks' venting and dust-control systems.

Minor fugitive losses of dry material may occur during transfer. The estimated campaign loss will be calculated using the total quantity of dry bulk transferred during the campaign and the verified transfer-loss factor.

3.2.2 Cementing Discharges

The 36-in conductor will be jetted in without cementing. A 20-in surface casing string will then be installed and cemented using approximately 336 m³ of slurry in the 26-in hole, with sufficient excess cement. Most of the slurry will remain within the casing–formation annulus. Cement returns to the seabed may occur during cementing of the surface casing.

For subsequent cementing operations, fluids will be returned to the MODU through the riser, as follows:

The 13-5/8-in intermediate casing will be cemented. The anticipated top of cement is approximately 300 m below the 20-in casing shoe. Cement slurry will remain within the wellbore unless circulation or remedial action is required.

The 9-5/8-in intermediate liner will be cemented, with the anticipated top of cement at the liner top. Residual cement and cement-contaminated fluids above the liner top may be circulated to the MODU. Following treatment and management onboard, limited discharge may occur in accordance with the applicable requirements. Cleaning the cementing unit may result in a further discharge. The total estimated routine surface discharge is approximately 15 m³.

P&A may generate up to approximately 24 m³ of cement or cement-contaminated fluid requiring management and discharge from the MODU.

If a cementing operation must be terminated because of equipment failure, blocked lines or another operational problem, up to approximately 48 m³ of cement slurry or cement-contaminated fluid may require discharge from the MODU. This represents a contingency case and is not part of the planned base-case discharge.

3.2.3 Pipe Dope

Pipe dope (also referred to as thread compound) is a lubricating and sealing compound applied to threaded connections on drill pipe, casing and other tubulars during make-up and break-out operations. Its primary purpose is to reduce friction and galling, provide corrosion protection and help ensure pressure-tight connections during drilling operations.

The Project will use commercially available thread compounds selected in accordance with the Project's chemical management procedures (including review of Safety Data Sheets and environmental / hazard screening).

These compounds are classified as non-discharged chemicals during normal operations. However, minor incidental losses to the marine environment may occur, such as wash-off from the rig floor during cleaning or rainfall, or limited transfer to the wellbore during tripping.

Controlled application and good housekeeping practices will be used to minimise excess thread compound and incidental losses. Waste thread compound, contaminated materials and empty containers will be collected and transferred ashore as waste in accordance with the Project Waste Management Plan

3.2.4 BOP Discharges

Following installation, operation and testing of the subsea BOP, diluted hydraulic-control fluid may be released at the seabed. The hydraulic-control fluid is Stack Magic Eco V2, mixed with potable water at approximately 4.5% Stack Magic and 95.5% water by volume.

Planned operations are estimated to discharge approximately 21.2 m³ of diluted hydraulic-fluid mixture. Including the assessed contingency operations, the maximum campaign total is approximately 42.9 m³, comprising approximately 40.97 m³ of water and 1.93 m³ of Stack Magic Eco V2. The maximum campaign total is equivalent to approximately 0.64 m³/day when averaged over 67 days; actual releases will occur intermittently rather than as a continuous daily discharge. A single rigid-conduit release may be up to approximately 18 m³. The discharge is conveyed through a pipe with a diameter of DN12 and is released at seabed level.

Table 3-3: Estimation of BOP discharges

FUNCTION	VOLUME (L)	FREQUENCY		TOTAL VOLUME PER WELL (L)					
		PLANNED	CONTINGENCY	PLANNED	CONTINGENCY	TOTAL			
						HYDRAULIC FLUID MIX	POT WATER	STACK MAGIC	
Accumulator Dump	2000	1	1	2,000	2,000	4,000	3,820	180	
Failsafe (12 per BOP)	3	400	400	1,200	1,200	2,400	2,292	108	
Rigid Conduit volume	18,000	1	1	18,000	18,000	36,000	34,380	1,620	
EDS	500	0	1	0	500	500	478	22	
Totals				21,200	21,700	42,900	40,970	1,930	

Stack Magic Eco V2 is water-soluble and biodegradable. At the assessed dilution of approximately 4.5%, operational releases will consist predominantly of water and will disperse after release from the subsea BOP system. The potential effects of the planned and contingency releases are assessed using the product characteristics, discharged quantity, dilution and receiving-environment conditions. The releases are expected to be localised and short-term.

3.2.5 Summary of Drilling Discharges

Table 3-4 summarises the anticipated drilling discharges while Table 3-5 presents scenario-specific contingency discharges. It should be noted that seawater may also be discharged throughout the drilling process. The discharge quantities presented in this section represent conservative upper-bound estimates based on the assessed design envelope. Actual discharge volumes may vary depending on final well design, drilling conditions and operational requirements.

Table 3-4: Drilling Discharges under normal operating conditions

DISCHARGE TYPE	TYPICAL MAXIMUM QUANTITY
Drilling Cuttings – Seabed Discharge ⁷	189 m ³ / 490 tonnes
Drilling Cuttings – Discharge 12m below sea level	174 m ³ / 453 tonnes
Water-based Mud – Seabed Discharge	1,156 m ³ / 1,318 tonnes
Water-based Mud – Discharge 12m below sea level	2,058 m ³ / 2,470 tonnes
Primary Cementing Operations	
Cement Slurry Seabed Discharge (riserless)	64.6 m ³ / 155 tonnes (if returns at seabed are identified early)
Cement Slurry Surface Discharges from Residuals, e.g., testing, line flushing, excess volumes	15 m ³ / 28 tonnes
BOP Installation and Function Testing	
BOP Hydraulic Fluids	2. Approximately 21.2 m ³ of diluted hydraulic-control fluid from planned operations. The maximum planned-plus-contingency campaign envelope is approximately 42.9 m ³ , comprising approximately 40.97 m ³ of water and 1.93 m ³ of Stack Magic Eco V2. Releases occur intermittently at seabed level.
Well P&A	
Contaminated Cement Surface Discharge	24 m ³ / 45 tonnes
Non-displaced wellbore content	Left inside the well
Water-based Mud inside wellbore and riser before displacing to Seawater – Surface Discharge	1,150 m ³ / 1,312 tonnes

Table 3-5: Drilling Discharges during contingency operations

CONTINGENCY ACTIVITIES	TYPICAL MAXIMUM QUANTITY	DISCHARGE AREA
Cuttings – Well re-spud (riserless / riser in place), m ³	152	Seabed / From MODU below sea level
Cement – Well re-spud (riserless / riser in place), m ³	35	Seabed / From MODU below sea level
Cuttings – Sidetrack ¹ (riser in place), m ³	174	From MODU below sea level
Cuttings – Emergency Disconnect ² (riser in place), tonnes	12.4	Seabed
WBM fluids - Emergency Disconnect ² (riser in place), m ³	174	Seabed
Failed cement job / cement contamination (riser in place)	48 m ³	From MODU below sea level
Contingent Cementing Operations (riser in place)	60 m ³	From MODU below sea level

Note: ¹ Indicative based on a 12-1/4-inch sidetrack hole

⁷ Drilling returns will be monitored through LWD, mudlogging and observation of the returned cuttings and drilling fluid. Where cuttings or drilling returns are identified as contaminated with reservoir hydrocarbons such that they are unsuitable for discharge under the applicable requirements, discharge of the affected material will cease and it will be contained onboard for transfer ashore.

The quantities in Table 3-5 represent scenario-specific upper-bound estimates. They are not expected to occur routinely and should not be summed as a single combined contingency discharge unless the underlying scenarios can occur cumulatively.

Emergency-disconnect quantities represent the estimated riser contents released during the same assessed EDS event. Actual quantities will depend on the drilling phase and the contents of the riser when disconnection occurs

3.3 Associated MODU and PSV Operational Waste

The drilling campaign will be executed utilizing a Mobile Offshore Drilling Unit (MODU), specifically the Stena DrillMAX drillship. Beyond the primary drilling waste, the daily operation, maintenance, and crew accommodation activities on board the Stena DrillMAX and its associated support vessels will continuously generate a distinct stream of associated operational wastes. These wastes are classified under the relevant chapters of the European List of Waste (ELW), primarily Chapter 13 (Oil Wastes), Chapter 14 (Solvents), Chapter 15 (Packaging and Absorbents), Chapter 16 (E-waste and Batteries), Chapter 20 (Municipal Wastes).

The management, segregation, and offshore treatment of these operational waste streams and effluents are strictly regulated to minimize any environmental footprint on the marine ecosystem, in absolute compliance with international maritime statutory instruments:

- The MARPOL Convention: Applied as the primary regulatory mechanism governing all shipboard operational discharges. Specifically, machinery space runoffs and bilge oils (ELW 13 04) are managed under Annex I (Oil); sewage and sanitary wastewater are treated under Annex IV (Sewage); and galley refuse, plastics, and general domestic waste are strictly controlled under Annex V (Garbage).
- The BWM Convention: Governing the automated treatment, neutralization, and high-seas exchange of ballast water to safeguard localized marine biodiversity from invasive aquatic species.
- The Barcelona Convention and its Offshore Protocol: Ensuring that all operational discharges within the Mediterranean jurisdiction are restricted to non-hazardous fractions and meet predefined regional water-quality criteria.

For all waste streams where offshore discharge is strictly prohibited under MARPOL and the Barcelona Convention—such as plastics, hazardous chemicals/packaging, cooking oils, mineral-based lubricating oils etc., the Stena DrillMAX will utilize a comprehensive management system, as detailed below.

Unlike offshore wastes, the management of these vessel-generated wastes upon arrival at the onshore base is governed directly by Greek legislation. Once these wastes are transferred to shore via support vessels, their offloading, handling, and subsequent transport to licensed recycling, treatment or disposal facilities will be executed through approved Port Waste Reception Facilities, in strict compliance with relevant legislation.

3.3.1 MODU Waste Management System and Procedures

The waste management system and procedures (L4-DOC-MAX-3473) of Stena DrillMAX drillship provide guidance for waste planning, segregation, collection, storage, processing, disposal and documentation for all materials, which have been brought onboard or discharged from the Stena DrillMax. Any exemption from the procedures below requires prior written approval of Rig Manager and Operations Manager.

3.3.1.1 Responsibilities

Master/OIM: Overall responsibility for implementing and monitoring the Waste Management System onboard the Stena DrillMax in line with applicable laws and operator requirements.

Barge Master: Ensure the Waste Management System is implemented on vessel and responsibility to record all waste discharges from the vessel, in the Waste Record Book according to MARPOL regulation.

Operator: The Operator has full responsibility for all well-related wastes.

3.3.1.2 Waste Segregation

All waste is segregated by type prior to sending it for disposal or recycling. Hazardous and non-hazardous and liquid and solid materials are kept in separate containers. Incompatible hazardous wastes shall not be mixed. Waste segregation, labelling and ship disposal methods are described in §Table 3-7.

3.3.1.3 Waste Storage And Backload

Designated waste separation and storage area onboard is located at the forward starboard corner of Main Deck (Deck 4). All solid waste generated onboard is collected and separated into the dedicated storage, each identified with type of waste. Then waste is transferred to waste skips and backloaded to Supply Vessels.

Accommodation waste bins are located on every deck level in front of the staircase. Waste from these bins is transferred to separation and storage on Deck 4.

3.3.1.3.1 Galley and Domestic Waste

The domestic waste⁸ will be backloaded to a Supply Vessel for shore disposal. Waste papers and packaging will be compacted prior to transfer to waste skips. Paper and plastic are shredded, if possible, to reduce the volume. No hazardous materials must be disposed of in this way, this includes empty aerosols, chemical containers (bleach etc.) and other packaging or materials likely to cause a hazard.

3.3.1.3.2 Waste Drums, Barrels, Cans

Any drum, barrel or can that contained hazardous or dangerous cargoes will be backloaded in a separate skip or container. This will include empty paint drums etc. All of these items must be resealed with their original closures and be intact. Care must be taken that all items loaded in a skip are compatible and in a safe condition for shipment.

When backloaded they must be accompanied by dangerous or hazardous goods documentation including data sheets on the products. The skips or containers will be clearly marked with the correct cargo labels. The supply vessel master must also be notified of the dangerous cargoes and be provided with the requisite data sheets.

Other drums, barrels or cans which have not contained hazardous materials can be treated as scrap metal. Only clean empty drums and other metal containers will be disposed of in this way. Empty paint, thinners containers etc. must not be placed in with this waste unless they are cleaned of residues. It may include electrical fittings but not lights or fluorescent tubes. This will be back loaded in skip or half height and consist of scrap metals only.

⁸ Domestic wastes means all types of wastes not covered by other Annexes that are generated in the accommodation spaces on board the ship. Domestic wastes does not include grey water (MARPOL Annex V Regulation 1).

3.3.1.3.3 Chemical Waste

Chemical waste generated offshore is handled in accordance with the drillship's waste management system and applicable national legislation, and are transferred onshore for treatment, recycling or disposal through licensed waste contractors. No disposal of chemical waste to sea is planned, other than permitted operational discharges of diluted water-based drilling fluids in accordance with the approved well programme and regulatory requirements.

Unused, surplus or unopened offshore chemicals will, where practicable, be returned to shore for re-use, restocking or return to suppliers. Empty containers and chemical packaging generated during operations are collected, segregated and managed as waste in accordance with applicable waste management procedures (pl. refer to §3.3.1.3.4.)

3.3.1.3.4 Waste Chemical Sacks

This will be back loaded in a container (palletised) or skip in one tonne hessian bags and will consist of wrappings and packaging from chemicals shipped to the rig that are of a hazardous or dangerous nature. Care must be taken that only substances that are compatible are placed in the same bag.

When backloaded they must be accompanied by dangerous or hazardous goods documentation including data sheets on the products. The skips or containers will be clearly marked with the correct cargo labels. The supply vessel master must also be notified of the dangerous cargoes and be provided with the requisite data sheets.

3.3.1.3.5 Hazardous Waste (Other)

This will be backloaded in a skip or container and consist of all other types of waste not defined above.

When backloaded they must be accompanied by dangerous or hazardous goods documentation including data sheets on the products. The skips or containers will be clearly marked with the correct cargo labels. The supply vessel master must also be notified of the dangerous cargoes and be provided with the requisite data sheets.

It will be the responsibility of the service company personnel to ensure that waste materials from their operation are correctly disposed of. The following are examples of mud chemicals that should not be disposed of together:- Ammonium Thiocyanate, Caustic Soda, Potassium Hydroxide, Sodium Hypochlorite, Ammonium Bisulphate, Lithium Hypochlorate and Lime. All the above substances and their packaging must be individually stowed and returned for disposal.

Waste oil should normally be shipped backed to base in bulk tanks and classified as hazardous goods. Waste oil tanks should not be used for the disposal of helifuel, thinners or solvents. If oil drums are used, they must be of the type used for clean oil and must be clearly marked as 'Waste Oil'. They will be shipped either in a container on pallets or in a half height clearly labelled.

When shipping hazardous or dangerous waste for disposal ashore the operators' logistics department must be contacted and informed of the shipment so that arrangements can be made for a waste contractor to be available at the port of entry.

3.3.1.4 Disposal / Transportation

All the waste from the Stena DrillMax will be shipped to shore using a Supply Vessel or sent to Port Reception Facilities when in port. All transportation will be as per the transportation of dangerous goods regulation. When the

ship is in transit mode from one country to another, waste will be stored on board with a consideration of “safety first” and practicability.

Although the vessel procedure provides for the use of the onboard incinerator in certain circumstances, onboard incineration is not planned for the Asopus-1 Project. Project waste covered by this WMP will be retained onboard and transferred ashore through the Project logistics chain or delivered to an authorised port reception facility, as applicable.

3.3.1.5 Documentation

All disposed waste shall be summarised monthly by the Storeman.

The Storeman onboard the Stena DrillMax is responsible for all waste documentation onboard, with the exception of the Garbage Log Book which is the Barge Master’s responsibility and stored in the Marine office. All waste that is sent ashore must be logged here.

Waste is to be grouped into categories for the purposes of recording in parts I and II of the Garbage Record Book as follows:

Table 3-6: Garbage Categories for the purposes of recording Garbage Record Book - Stena DrillMax

CATEGORY	DEFINITION ⁹
Category A	Plastics means a solid material which contains as an essential ingredient one or more high molecular mass polymers and which is formed (shaped) during either manufacture of the polymer or the fabrication into a finished product by heat and/or pressure.
Category B	Food waste means any spoiled or unspoiled food substances and includes fruits, vegetables, dairy products, poultry, meat products and food scraps generated aboard ship.
Category C	Domestic waste means all types of wastes not covered by other Annexes that are generated in the accommodation spaces on board the ship. Domestic waste does not include grey water.
Category D	Cooking oil means any type of edible oil or animal fat used or intended to be used for the preparation or cooking of food but does not include the food itself that is prepared using these oils.
Category E	Incinerator ash means ashes and clinkers resulting from shipboard incinerators used for the incineration of garbage.
Category F	Operational waste means all solid wastes (including slurries) not covered by other Annexes that are collected on board during normal maintenance or operations of a ship or used for cargo handling and stowing.
Category G	Animal carcass means the bodies of any animals that are carried on board as cargo and that die or are euthanized during the voyage.
Category H	Fishing gear means any physical device or part thereof or combination of items that may be placed on or in the water or on the seabed with the intended purpose of capturing marine or estuarine organisms.
Category I	E-waste means electrical and electronic equipment used for the normal operation of the ship or accommodation, including all components, subassemblies and consumables which are part of the product at the time of discarding.

⁹ MARPOL Annex V

CATEGORY	DEFINITION ⁹
Category J	Cargo residues mean the remnants of any cargo which remain on deck or in holds following loading or unloading [...] and do not meet the criteria for being harmful to the marine environment (Non-HME).
Category K	Cargo residues mean the remnants of any cargo which remain on deck or in holds [...] and do meet the criteria for being harmful to the marine environment (HME).

Consigned Special Waste shipped by sea from Stena DrillMax must be accompanied by a shipping Manifest. The waste will be identified by using the U.N. Dangerous Goods Code and by its waste category.

Copies of Hazardous Waste Consignment notes received back from the licensed waste carrier must be attached to the respective Rig to Shore Shipping Manifest and retained for at least three years.

The cargo Manifests will indicate the following in sequential order: (proper scientific) shipping name, hazardous class, identification number UN#, package group.

Hazardous material must appear first on the Manifest or be clearly identified by use of a box or Hazardous column. Additionally, the CHIP must be the only entry on the first line. Comments below the first line should be used to describe the waste product for internal or Third Party clarification.

The Barge Master is to co-ordinate with the Client Logistics and ensure that all certificates for waste disposal are stamped by the Third Party Company who collect/recycle/treat the waste, or any government authority who might be involved in the waste disposal process in the country of location. These are obtained by the Client Logistics downloading the waste disposal receipts from their online portal and providing copies to the Barge Master. All this certification shall be retained for future reference and audits by Flag State or Class

3.3.1.6 Training

General Waste Management awareness is raised amongst personnel through the Rig Induction, Toolbox Talks, presentations and the use of posters, as applicable. Personnel with more specific responsibilities for the Management of Waste will attend further training courses as applicable. All personnel must attend an Environmental Awareness and waste management courses as per and in accordance with the Training Matrix.

3.3.1.7 Waste Location and Disposal Method

Table 3-7 provides the vessel's waste storage locations and the disposal methods.

Table 3-7: Waste Location and Disposal Method - Stena DrillMax

WASTE LOCATION AND DISPOSAL METHOD - STENA DRILLMAX			
WASTE STREAM	CATEGORY	LOCATION OF BINS/SKIPS/TOTE TANKS	DISPOSAL METHOD
Domestic Waste	Non-hazardous	Deck 4, stbd fwd, compactor bags	Backload waste skips to supply vessel
Paper	Non-hazardous	Deck 4, stbd fwd, compactor bags	Backload waste skips to supply vessel
Plastic (not contaminated with food)	Non-hazardous	Deck 4, stbd fwd, compactor bags	Backload waste skips to supply vessel
Aluminium cans (containing drinkable liquids only)	Non-hazardous	Galley deck, metal waste skip	Backload waste skips to supply vessel

WASTE LOCATION AND DISPOSAL METHOD - STENA DRILLMAX			
WASTE STREAM	CATEGORY	LOCATION OF BINS/SKIPS/TOTE TANKS	DISPOSAL METHOD
Batteries (Ni/Cd, alkaline)	Hazardous	Deck 4, 10, stbd fwd, 200ltr drums. Larger battery packs, crates	Battery terminals shall be taped prior to disposal in to waste Bins. Backload in mini container to supply vessel
Cardboard	Non-hazardous	Deck 4, stbd fwd, compactor bags	Backload waste skips to supply vessel
Metal	Non-hazardous	Galley deck, metal waste skip	Backload waste skips to supply vessel
Fluorescent Lamps	Hazardous	Deck 4, lamp crusher, contents disposed of into 200ltr click top drums	Backload to supply vessel
Food waste	Non-hazardous	Galley, line overboard	Only food waste (except large bones) will be macerated into 25mm size and flushed overboard or frozen and backloaded to approved waste receiver when in port
Oily rags	Hazardous	Deck 4, aft, purpose designed waste baskets with lids (toolbox).	Backload to supply vessel
Oil Waste	Hazardous	Deck 4 aft, drums	Backload to supply vessel
Hydrocarbon-contaminated cuttings	Hazardous	Ship and skip station, prt, dedicated skips	Backload to supply vessel
Empty paint cans	Hazardous	Deck4. stbd aft, compactor bags	Backload waste skips to supply vessel
Aerosol Cans	Hazardous	Deck 4, stbd fwd, compactor bags	Backload waste skips to supply vessel
Glass	Non-hazardous	Galley deck, glass waste compactor bags	Backload waste skips to supply vessel
Wood	Non-hazardous	Waste wood skip, galley deck	Backload waste skips to supply vessel
Oil filters	Hazardous	Oil waste drums or cutting skips	Backload to supply vessel
Used Cooking oil	Hazardous	Cooking oil waste drum, galley deck	Incinerate on board or backload to supply vessel
Medical Waste	Hazardous	Waste bin in the hospital	Backload in mini container to supply vessel
Used Lube Oil	Hazardous	Sludge tank	Incinerate on board or backload to supply vessel
Oil sludge	Hazardous	Sludge tank	Incinerate on board or backload to supply vessel
Paint and Thinner	Hazardous	Waste paint drum, AFT deck, stbd	Backload in mini container to supply vessel
Toner	Hazardous	Deck 4, stbd fwd, open top IBC	Backload to supply vessel
Electrical Waste	Non-hazardous	Deck 4, stbd fwd, open top IBC	Backload to supply vessel

3.3.2 MODU Hazardous Waste Quantities

Hazardous waste generated during drilling operations will primarily comprise machinery sludge, contaminated oil wastes, paints and solvents, and chemical wastes associated with maintenance and offshore drilling activities.

Table 3-8: Estimated hazardous waste - Stena DrillMAX

HAZARDOUS WASTE STREAM	DESCRIPTION	ESTIMATED QUANTITY	MANAGEMENT METHOD
Sludge	Oily sludge generated from machinery spaces, fuel purification systems, bilge water treatment, and maintenance activities	3 m ³ /week	Collected and transferred to licensed onshore waste management facilities for treatment and disposal
Oil contaminated waste	Oil-contaminated absorbents, used filters, empty chemical or lubricant containers, contaminated hoses, and maintenance materials containing hydrocarbons or lubricants	480 kg/week	Segregated, stored onboard, and transferred to licensed onshore facilities for recovery or disposal
Paints and solvents	Residual marine coatings, epoxy and anti-corrosion paints, paint thinners, cleaning solvents, degreasers, contaminated paint containers generated during vessel maintenance activities	150 kg/week	Stored in designated hazardous waste areas and transferred to licensed onshore facilities
Chemical waste	Spent, contaminated or unusable drilling chemicals, mud additives, cement additives and maintenance chemicals; waste hydraulic fluids, detergents and contaminated chemical containers.	750 kg/week	Collected separately and transferred to licensed onshore treatment or disposal facilities

The quantities presented are indicative weekly generation estimates based on comparable vessel operations. Actual quantities will depend on maintenance activities, chemical use and operational conditions. Waste will be classified according to its composition and applicable waste-classification requirements before transfer ashore.

Hazardous waste will be segregated, temporarily stored in designated onboard storage areas, and transferred to licensed onshore waste management facilities for treatment, recovery, or disposal in accordance with applicable national and international waste management requirements.

3.3.3 MODU Non-Hazardous Waste Quantities

3.3.3.1 MSW

Municipal solid waste (MSW) will be generated onboard the MODU and PSVs as a result of routine accommodation, catering, maintenance and operational activities. Waste streams are expected to include general domestic waste, paper and cardboard, plastics, metals, electrical and electronic waste, packaging materials and used cooking oil. Based on anticipated personnel levels and historical operational data, estimated waste generation during the drilling campaign includes approximately 1,200 kg of general non-recyclable waste, 1,520 kg of paper, wood and cardboard, 56 kg of plastics, 2,350 kg of metals, 375 kg of electrical waste and 75 kg of used cooking oil.

In accordance with MARPOL Annex V, the Mediterranean Sea Special Area requirements, Greek implementing legislation and the pollution prevention objectives of the Barcelona Convention Offshore Protocol, the discharge of plastics and other municipal or operational garbage to sea is prohibited, and other municipal and operational wastes will be retained onboard except where a specific discharge is permitted under MARPOL Annex V Values represent indicative upper-bound estimates as outlined in Table 3-9.

Table 3-9: Estimated non-hazardous waste - Stena DrillMAX

WASTE STREAM	INDICATIVE WEEKLY GENERATION RATE	ESTIMATED TOTAL (67 DAYS)
General non-recyclable	1,200 kg	~11,600 kg
Paper, wood and cardboard	1,520 kg	~14,600 kg
Plastics	56 kg	~540 kg
Metals	2,350 kg	~22,600 kg
Electrical waste	375 kg	~3,600 kg
Cooking oil	75 kg	~720 kg

All MSW will therefore be managed under the vessel's approved Garbage Management Plan, with waste segregation undertaken at source to maximise opportunities for recycling, recovery and appropriate treatment. Waste materials will be collected in designated, clearly labelled containers, compacted where appropriate, and stored in enclosed waste-handling areas to prevent littering, odour generation, and accidental loss to the marine environment.

All municipal and operational solid waste, including plastics, paper, cardboard, metals, packaging materials, waste electrical equipment, and used cooking oil, will be retained on board and transferred to authorised shore reception facilities via the project logistics chain. Waste will subsequently be managed by licensed waste contractors in accordance with applicable waste management regulations and the Waste Management Plan (WMP). No processing of these waste streams for overboard disposal will occur. All waste transfers will be documented through the vessel's waste-tracking procedures, including maintenance of the Garbage Record Book, to ensure traceability from generation through to final treatment or disposal. Personnel will receive appropriate training in waste segregation, storage and pollution prevention measures to minimise the risk of accidental releases to the marine environment.

3.3.3.2 Food Waste

Food waste will be generated primarily from galley and catering activities associated with accommodation facilities onboard the MODU. Based on historical data from comparable drilling campaigns (1.05 kg per person per day, maximum 1.16 kg/person per day) and a maximum accommodation level of 180 persons on board (POB), food waste generation is estimated at approximately 189 kg/day, with a maximum generation rate of approximately 209 kg/day, resulting in an estimated total of approximately 12.7 tonnes over the 67-day drilling campaign.

Food waste will be managed in accordance with the vessel's Garbage Management Plan, MARPOL Annex V, the Mediterranean Sea Special Area provisions and applicable Greek regulatory requirements. Food waste will be segregated from other waste streams at the source and managed to prevent contamination by plastics, packaging materials, or other non-food waste. Where discharge is permitted under MARPOL Annex V requirements, food waste will first be macerated to a particle size of 25 mm or less and discharged only where the MODU is located beyond the applicable minimum distance from the nearest land. Discharges will occur through the vessel's dedicated food waste discharge system, located approximately 12 m below sea level.

Food waste may be discharged where the applicable MARPOL Annex V conditions are met. Where compliant discharge is not available or operationally practicable, food waste will be retained onboard and transferred to an authorised shore reception facility.

Given the biodegradable nature of food waste, the relatively small quantities involved compared with the receiving marine environment, compliance with MARPOL Annex V discharge requirements and the offshore location of drilling activities, significant adverse environmental effects from food waste management are not anticipated.

3.3.4 MODU Discharges - Type and Quantities

Operational discharges from the MODU and associated support vessels will be managed in accordance with MARPOL (Annexes I, IV and V), the International Convention for the Control and Management of Ships' Ballast Water and Sediments, and the corresponding EU, Greek and flag-state implementing requirements, in a manner consistent with Greece's obligations under the Barcelona Convention and its Offshore Protocol,, as summarised in Table 3-10.

Table 3-10: Non-Drilling Discharge Streams - Stena DrillMax

DISCHARGE STREAM	SOURCE / DESCRIPTION	TREATMENT / CONTROL MEASURE	DISCHARGE LIMIT / PERFORMANCE STANDARD	APPLICABLE CONVENTION / STANDARD / CONTROL BASIS
Bilge water / oily deck drainage	Oily mixtures from machinery spaces and any contaminated deck drainage on the MODU and support vessels	Collection in bilge tanks; processing through approved 15-ppm oily water separator (OWS) with oil content monitor and automatic stopping device; discharge conditions recorded in Oil Record Book	Discharge overboard only when the applicable MARPOL Annex I conditions are satisfied, and the oil content of the undiluted effluent does not exceed 15 mg/L. If the discharge criteria are not met, overboard discharge will be stopped, and the effluent retained for further treatment or transfer to an authorised port reception facility.	MARPOL Annex I, Regulation 15 (control of discharge of oil); approved 15-ppm oily water filtering equipment and Oil Record Book requirements.
Ballast water	Seawater used in ballast tanks on the MODU and support vessels	Implementation of an approved Ballast Water Management Plan; use of a certified Ballast Water Treatment System (BWTS) to meet the D-2 standard for ballast water discharges, with D-1 open-ocean exchange retained only as a contingency method where applicable; all ballast operations recorded in the Ballast Water Record Book.	Under normal operations, ballast water discharged only after treatment to meet the D-2 performance standard for living organisms; in exceptional circumstances, sequential ballast-water exchange to the D-1 standard may be used as a contingency measure in approved offshore areas, in line with the vessel's Ballast Water Management Plan	BWM Convention Regulations B-1, D-1, D-2 and D-3; approved Ballast Water Management Plan and Ballast Water Record Book.
Cooling water (non-contact)	Non-contact cooling water from engines, thrusters and auxiliary systems	Non-contact cooling system segregated from oily and contaminated drains; marine growth	Discharged as clean, non-oily water with no visible sheen, discoloration or floating solids; must not contain oil or	MARPOL general pollution-prevention obligation (Annex I/ Convention articles) for discharges free of oil and harmful

DISCHARGE STREAM	SOURCE / DESCRIPTION	TREATMENT / CONTROL MEASURE	DISCHARGE LIMIT / PERFORMANCE STANDARD	APPLICABLE CONVENTION / STANDARD / CONTROL BASIS
		prevention treatment addressed below.	harmful substances in quantities that would cause pollution	substances; Greek environmental legislation on discharges free of oil/harmful substances.
Cooling water with marine-growth-prevention treatment	Seawater systems, including desalination pre-treatment, where biocides or corrosion inhibitors may be dosed	Treatment chemical applied at the operational dosage required to maintain cooling-system performance and managed under the applicable vessel chemical-management and regulatory requirements.	Residual concentrations of biocides/additives in discharge kept within manufacturer, flag-state and permit-defined limits and at levels not expected to cause harmful effects; no visible pollution at discharge	Barcelona Convention Offshore Protocol; UNEP/MAP Common Standards and Guidelines for the Use and Disposal of Drilling Fluids and Cuttings and offshore chemicals in the Mediterranean; operator chemical management procedures.
Stena DrillMAX Desalination brine (1 evaporator + 2 ROs)	Concentrated brine/reject from a thermal evaporator and two reverse osmosis plants producing freshwater	Brine kept segregated from oily and chemical systems; no deliberate addition of oil or harmful substances; operational controls minimise any pre-treatment chemical residuals	Discharged locally at the rig as a clean, high-salinity stream without oil or added harmful substances; expected rapid dispersion at open-sea location (~44 km from closest shoreline); no visible pollution	MARPOL general pollution-prevention obligation for discharges that do not contain oil or harmful substances; Greek environmental legislation for discharges free of oil and harmful substances.
Treated sewage	Blackwater from toilets and sanitary facilities; greywater from showers, wash basins, laundries and galley facilities is treated through the final stage of the sewage-treatment system.	Collection in sewage system; treatment in IMO-approved sewage treatment plant operated in accordance with its certificate; discharges logged in Sewage Record / PMS	Discharge of treated sewage permitted only when the approved plant is operating and effluent quality meets IMO performance standards and flag-state criteria; otherwise retained on board for shore reception	MARPOL Annex IV (sewage); IMO performance standard for sewage treatment plants; International Sewage Pollution Prevention Certificate / equivalent flag-state certification.
Untreated / non-compliant sewage (contingent)	Sewage in case of treatment plant unavailability or non-compliance	Diversion to holding tanks; no planned overboard discharge; transfer to shore reception facilities at first opportunity	No routine discharge of untreated or non-compliant sewage; any exceptional discharge only under MARPOL Annex IV conditions (vessel en route, sufficient distance from land, moderate rate, Administration approval)	MARPOL Annex IV, discharge conditions for untreated sewage; vessel sewage management procedures and holding-tank arrangements.

DISCHARGE STREAM	SOURCE / DESCRIPTION	TREATMENT / CONTROL MEASURE	DISCHARGE LIMIT / PERFORMANCE STANDARD	APPLICABLE CONVENTION / STANDARD / CONTROL BASIS
Waste oils, spent chemicals and liquid hazardous wastes	Lube and hydraulic oils, spent chemicals, paint residues, collected small spills and similar	Collection in dedicated tanks/containers; labelling and secure storage; transfer to licensed onshore waste contractors; no shipboard treatment for sea discharge	No planned discharge to sea. These waste streams will be retained onboard and transferred ashore to authorised recovery, treatment or disposal facilities. Accidental releases are addressed through the spill-response and accidental-events arrangements.	MARPOL Annex I and Annex V prohibitions on disposal of oil and harmful substances at sea; Greek hazardous-waste legislation; company waste-management standards.
Note: Greywater is routed through the final stage of the sewage-treatment system for treatment and chlorine disinfection before discharge. Greywater quantities are reported separately in Error! Not a valid result for table.				

Firewater discharges may occur during system testing or emergency response. Such discharges are infrequent and managed under the Project's emergency response procedures and chemical management systems, with notification and reporting as required.

Operational discharges from the drillship and support vessels are managed in accordance with established pollution-prevention and environmental management systems, consistent with applicable international and national requirements. Discharge types, controls, applicable standards and discharge quantities are summarised in **Error! Not a valid bookmark self-reference.** overleaf.

Table 3-11: Stena DrillMAX Discharge Estimates

NO.	DISCHARGE STREAM	SOURCE / DESCRIPTION	TREATMENT / CONTROL MEASURE	DISCHARGE LIMIT / PERFORMANCE STANDARD	AVG. DAILY VOLUME (M ³ /DAY)	MAX VOLUME (M ³ /DAY OR EVENT)	TOTAL VOLUME (67 DAYS)	PIPE DIAMETER (MM)	DISCHARGE DEPTH (M)
1	Bilge water / oily deck drainage	Machinery spaces and contaminated drainage	Oily Water Separator (15 ppm OCM, auto shut-off, Oil Record Book)	≤15 ppm oil; no visible sheen; MARPOL Annex I compliant discharge conditions	4.5	20.0	302	DN65	+1 / -12
2	Boiler blowdown	Boiler system purge	No treatment	No harmful substances; controlled discharge	0.5	15.0	36	DN65	-12
3	Drain system (deck runoff)	Rainfall + deck washing	OWS for contaminated runoff (<15 ppm)	≤15 ppm oil; no visible sheen	Not applicable – rainfall dependent. Worst-case ref. 319.7	Approximately 525 m ³ /day under the assessed peak wet-weather scenario	Not estimated – dependent on actual cumulative rainfall during the campaign	—	+1 to -12
4	Ballast water	Ballast tanks (MODU + support vessels)	BWTS + Ballast Water Management Plan	D-2 standard (primary); D-1 exchange (contingency only)	22	28,000 (one-off transit discharge)	29,474	DN700	-1
5	Cooling water (all systems)	Engines, thrusters, machinery cooling	Non-contact cooling; no oil contamination	No oil or harmful substances; no visible pollution	90,080	97,760	6,035,360	DN125–350	-6 to -12
6	Evaporator brine	Freshwater production (1 evaporator)	Dilution with cooling water; segregated system	No oil or harmful substances; rapid dispersion	1,174	1,174	78,658	DN125	-5
7	RO brine	Freshwater production (2 RO units)	Dilution with cooling water; segregated system	No oil or harmful substances; rapid dispersion	238	238	15,919	DN125	-12
8	Treated sewage (black water)	Toilets, sanitary systems	IMO-approved sewage treatment plant	MARPOL Annex IV effluent standards	20.5	20.5	1,371	DN50 / DN65	-12
9	Greywater	Showers, laundry, galley wastewater	Routed to the final stage of the sewage treatment plant for treatment and chlorine disinfection prior to discharge.	MARPOL Annex IV compliant discharge conditions where applicable	45.0	45.0	3,015	DN200	-12

3.4 Drilling-Related Decommissioning Waste

Waste generated during decommissioning will be managed in full compliance with applicable legislation, featuring separate collection for safe and temporary offshore storage, transportation to the onshore supply base, and subsequent transfer by authorized service contractors for recycling, treatment, or final disposal.

All decommissioning activities will be conducted in accordance with the HEREMA-approved Notification of Well Operations (NoWO) and applicable regulatory requirements. The decommissioning phase of the Asopus-1 exploration well will commence immediately following completion of drilling and formation evaluation activities. As the project is limited to exploration drilling, no production phase is planned. Accordingly, cessation of operations will occur upon completion of the well evaluation program and confirmation of the well status.

The MODU will be disconnected from the well and prepared for demobilisation. The blowout preventer (BOP) and marine riser will be disconnected, flushed with seawater as required, and recovered to the drillship.

The MODU will then depart the operational area using its own propulsion system. As no anchors are deployed during operations, no anchor recovery or associated seabed disturbance is required.

Well decommissioning will be undertaken through plug and abandonment (P&A), in accordance with the NoWO and established offshore drilling practices. Cement plugs will be installed to create rock-to-rock barriers across the reservoir section and any permeable formations with flow potential, preventing crossflow and minimising the risk of unintended fluid release.

Following installation and verification of abandonment barriers using the methods specified in the final abandonment programme, the wellhead will be left in situ.

After the recovery of the subsea equipment, the MODU-deployed ROV will undertake a post-operation seabed survey to confirm recovery of Project equipment and the absence of Project-related debris in the vicinity of the well.

Overall, no specific restoration measures beyond removal of equipment and confirmation of seabed clearance are required.

During the offshore demobilisation phase, no new waste streams or European List of Waste codes are anticipated to be generated beyond those previously identified in the operational phases; consequently, all waste management, handling, and disposal protocols remain unchanged and will be executed in accordance with established project waste management procedures.

4 Onshore Waste Classification, Quantification and Management

4.1 Onshore Waste Types

The operation of the onshore base throughout the Project's lifecycle will generate various waste streams resulting from vessel offloading, warehouse logistics, machinery maintenance, and administrative support activities. In absolute contrast to offshore operations, all waste generated, stored, or handled within the onshore base boundaries falls strictly and entirely under the jurisdiction of nation WM and environmental legislation. For all waste streams the onshore base will utilize a comprehensive management system, as detailed below.

The waste categories estimated to be generated offshore during the Project's operation is classified in accordance with the European List of Waste (ELW), as detailed in Table 4-1. In this classification, codes appended with an asterisk (*) denote waste streams categorized as hazardous. Detailed descriptions and inventories for each individual waste stream are provided in the subsequent sections of this section.

Table 4-1: Classification of onshore waste according to the ELW

ELW CODE	ELW DESCRIPTION
13	OIL WASTES AND WASTES OF LIQUID FUELS (except edible oils, and those in chapters 05, 12 and 19)
13 02	waste engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 07	glass packaging
15 01 09	textile packaging
15 01 10*	packaging containing residues of or contaminated by hazardous substances
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 02	wastes from electrical and electronic equipment

ELW CODE	ELW DESCRIPTION
16 02 11*	discarded equipment containing chlorofluorocarbons, HCFC, HFC
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	batteries and accumulators
16 06 01*	lead batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	glass
20 01 08	biodegradable kitchen and canteen waste
20 01 11	textiles
20 01 21*	fluorescent tubes and other mercury-containing waste
20 01 27*	paint, inks, adhesives and resins containing hazardous substances
20 01 29*	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 04	septic tank sludge
20 03 07	bulky waste

The classification of waste as hazardous or non-hazardous, and, in particular, understanding when and under what circumstances waste is to be considered hazardous is a crucial decision in the entire chain of waste management from generation to final treatment. When a waste is correctly classified as hazardous, a number of important

obligations are triggered, for instance on labelling and packaging, but also in terms of the available compliant treatment. It is noted that the classification of waste, shall be carried out in accordance with the provisions of the “Commission Notice on technical guidance on the classification of waste” (2018/C 124/01) (pl. ref. to § 7), based on the Waste Framework Directive 2008/98/EC, which has been transposed into Greek legislation through Law 4819/2021 (GG 129/A/23.07.2021), and Regulation (EC)¹⁰ No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (CLP Regulation).

4.2 Onshore Base Waste Management System and Procedures

The onshore base at the Port of Igoumenitsa will manage waste generated from both offshore operations and onshore operations.

Segregated waste received from offshore and generated at the base will be transferred to appropriate receiving, recycling, or licensed waste management facilities, as applicable, in accordance with the Project Waste Management Plan and relevant regulatory requirements via the Project’s shore base at the Port of Igoumenitsa.

Waste management system at the shore base is designed to ensure the safe handling, temporary staging, transportation, and treatment of all waste generated from offshore drilling and associated port/base operations. Waste management practices are implemented in accordance with applicable Greek environmental legislation, port authority requirements, MARPOL requirements, and IMDG Code provisions where applicable.

4.2.1 Responsibilities

Operational applicability: Drilling Manager is ultimately accountable for the fulfilment of the Onshore Waste Management Plan.

HSE Manager shall ensure this plan is implemented and followed, periodically ensure audits of the plan, provide resources (personal, training, and equipment) for the implementation of the plan, provide for the development and implementation of appropriate assets and personnel for monitoring and control of the plan.

Onshore Drilling Superintendent: shall ensure all waste management procedures are complied with and that appropriate attention is given to all aspects of waste handling associated with any work offshore, and ensure appropriate action is taken to prevent the reoccurrence of a non-conformity.

Base Manager shall be responsible for:

- Compliance with the procedures outlined in the Plan and in accordance with applicable regulatory requirements.
- Training personnel of the Waste Management Plan requirements and implementation.
- Responsible for waste labeling, handling, transport, shipping, and documentation requirements.
- Ensure receipts proving the proper transfer and disposal of hazardous waste are maintained
- Ensure monthly reports detailing the quantities of hazardous waste disposal, transportation and disposal is maintained and submitted as detailed in this Waste Management Plan
- Review the Waste Register monthly at a minimum.

¹⁰ Current consolidated version: 01/07/2026: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1272-20260701>

Environmental Specialist shall be responsible for:

- Guiding other roles involved with managing and disposing of waste
- Reviewing progress of waste management at an Asset level and, where required, coordinating waste reduction, reuse, recycling schemes, and targets
- Providing a focal point and coordinating progress towards the aim of eliminating waste
- Ensuring all relevant service providers along the chain of waste handling and disposal are following relevant regulations and company requirements
- Verify the disposal of all dangerous goods to the dangerous waste disposal site as appropriate ensuring the delivery is categorized as dangerous goods with the appropriate 'manager approval' as defined by the Business Licensing Regulations (Dangerous Goods Waste Disposal) (1990)
- Collecting the data on waste produced, disposal route taken, etc.
- Communicating targets, performance against targets, and completing audits of offshore facilities and waste contractor sites
- Providing the focal point for external waste management contractors to ensure consistency of data handling
- Providing guidance to assets on legislative and technical developments

Health Safety Environment & Compliance Officer shall be responsible for:

- Provide advice and support related to waste management
- Audit waste management / disposal procedures
- Provide guidance and training on waste management procedures
- Conduct risk assessments on all hazardous materials
- Coordinate and evaluate storage of hazardous waste materials
- Report and investigate hazardous waste incidents / events
- Continuously improve waste management awareness

Materials Dangerous Goods Supervisor shall be responsible for:

- Facilitate the development, implementation, and ongoing management of a Waste Management Plan for the Igoumenitsa Port shore base.
- Ensure the Plan is compliant with the requirements outlined in the Greek regulations
- Maintain the Approved Transporter/Disposal List
- Waste classification
- Maintain register of corrective actions for nonconformances
- specify and inspect activities performed by contractors
- Facilitate regular site and record reviews of all parties involved to ensure the procedures contained in this Plan are being carried out or under revision
- Developing training, as appropriate
- Working closely with the Logistics Base Manager, Operations Supervisor, Lead Operator, Vendors, Suppliers, Contractors, Governmental Agencies, Corporate HSE and the public.
- Recommend Management regarding formal policy procedures and resource allocation; assistance with training efforts, assessment, and evaluation of new ideas and/or programs.

- Ensure the Waste Register is created and maintained for all waste shipped to and generated at Igoumenitsa Port shore base.
- Ensure waste is properly classified, segregated, packaged, labeled, and handled as specified in the Waste Register.
- Communicate with the Person-In-Charge at each rig regarding any changes to their respective waste registers to ensure the shore base is prepared to properly handle the waste once it reaches the Igoumenitsa Port shore base.
- Maintain the Waste Management Plan.
- Review the Plan prior to operations and thereafter as required following material changes to project scope, waste streams, regulatory requirements or operational arrangements.

The Offshore Medic/Paramedic/Nurse shall ensure that clinical waste is collected in appropriate containers and will complete the consignment documents for carriage and disposal of all clinical waste.

All personnel are responsible for minimizing the generation of waste and ensuring that all waste is handled, segregated, and disposed of appropriately. Everyone has a 'duty of care' responsibility to ensure that waste is handled and disposed of appropriately. All staff must be made aware of waste handling requirements.

- The responsibilities of the shore base HSE officer are to
- Monitor the actions taking place in the shore base
- Verify that operations and procedure are performed according to Greek laws and regulations
- Verify that operations are being held in HSE responsible manner
- Report and inform the Base Manager and Operations Supervisor about any issue or improvements.

4.2.2 Offshore Waste Inspection

The Igoumenitsa shore base functions primarily as a transit and transfer location for waste arriving from offshore facilities. Long-term waste storage is not permitted at the port or shore base. Waste is temporarily staged only for the minimum period required to coordinate transfer to approved transportation contractors and licensed disposal or recycling facilities.

Waste management activities are based on the following principles:

- Minimization of waste generation.
- Segregation of waste at source.
- Prevention of environmental contamination.
- Proper classification, packaging, and labelling of waste.
- Full traceability of waste from generation to final disposal.
- Use of licensed transporters and authorized treatment or disposal facilities only.

All waste generated offshore will be segregated at source prior to backload to shore. Hazardous and non-hazardous wastes are separated and packaged in suitable containers appropriate to the waste type and transportation requirements. Waste streams will be clearly identified and maintained separately to prevent cross-contamination.

Typical hazardous waste streams that will be managed through the shore base include:

- Waste oils

- Oil contaminated materials
- Chemical waste
- Paints and solvents
- Aerosols
- Batteries
- Clinical waste
- Contaminated packaging
- Flammable materials,

Typical non-hazardous waste streams include:

- Scrap metal
- Wood
- Glass
- Aluminum cans
- Domestic waste
- Food waste
- Electronic waste
- Non-contaminated packaging materials

All waste arriving at the shore base will be inspected prior to transfer from the vessel, to verify proper waste segregation, correct packaging and container integrity, correct labelling. Manifests and shipping documentation will be available, to ensure compliance with IMDG and transport requirements where applicable.

Minor deficiencies, such as missing labels or unsecured lids, will be corrected immediately. Any damaged, leaking, or improperly packaged waste containers will be isolated and reported to the Base Manager and HSE personnel for corrective action. Waste that does not meet handling or transport requirements will not be accepted for transfer until the non-conformance has been resolved.

4.2.3 Waste handling and transport

All waste must be properly handled and stored as required by the relevant WM legislation. The shore base functions primarily as a transit and transfer location for waste arriving from offshore facilities. Long-term waste storage is not permitted at the port or shore base. Waste is temporarily staged only for the minimum period required to coordinate transfer to approved transportation contractors and licensed disposal or recycling facilities. Temporary staging areas for different waste categories will be designated at the shore base, including:

- Hazardous waste containment areas
- Non-hazardous waste skips
- Scrap metal collection areas
- General waste skips
- Liquid waste transfer locations

Hazardous waste will be stored in designated areas with appropriate containment measures to prevent spills or environmental release. Incompatible waste streams will be segregated to prevent reactions or contamination. Liquid

wastes, including waste oil and slops, will not be stored for extended periods at the shore base. Transportation to the final disposal or treatment facility is arranged prior to vessel arrival whenever possible.

Waste packaging will be selected to ensure safe transport and prevent leaks, spills, or damage during handling operations. Hazardous waste containers will be sealed and maintained in good condition during handling and transport activities.

All liquid wastes will not be stored; transport must be arranged to the treatment facility before the vessel is in port.

Waste transportation will be conducted only by approved and licensed waste contractors. Transportation arrangements will be coordinated before waste arrives at the shore base to minimize staging time. Waste will be transferred directly from the shore base to authorized disposal, treatment, recovery, or recycling facilities. Hazardous waste shipments will be accompanied by the required hazardous waste documentation and Safety Data Sheets (SDS) where applicable. All waste documentation will be retained in accordance with company and regulatory recordkeeping requirements.

Waste handling activities will be performed using appropriate spill prevention measures and Personal Protective Equipment (PPE).

In the event of a spill or environmental incident:

- Immediate containment measures will be implemented
- The affected area will be isolated
- The Base Manager and HSE personnel will be notified
- Port emergency procedures will be followed where required.

All incidents and non-conformances will be investigated and corrective actions implemented to prevent recurrence.

Personnel involved in waste handling activities will receive training appropriate to their responsibilities, including waste segregation and labelling requirements, hazardous waste handling, spill response, PPE use.

4.2.4 Waste Staging Location

A layout of the base, including operational zoning, is presented in Figure 1-1. The exact area used within the Port of Igoumenitsa may vary depending on concurrent port activities and operational requirements; however, any such variation will remain within the designated operational zone and will not alter the overall logistics approach and waste management procedures.

The Base is expected to comprise an open yard storage area of up to approximately 13,000 m² of level paved or interlocked hardstanding located within a secure port facility compliant with the International Ship and Port Facility Security (ISPS) Code. The yard will include appropriate drainage and operational lighting systems together with internal access routes suitable for heavy vehicle movements and logistics operations.

Temporary covered storage facilities may also be utilised, comprising warehouses or sheltered storage areas with concrete flooring and lighting. The indicative covered storage area is expected to range between approximately 500 and 1,000 m², depending on operational requirements.

Utilities and ancillary services are expected to include electricity supply, operational lighting and fresh water supply capability at the quayside, provided via pipeline connection.

Waste management facilities will be provided for the temporary handling and segregation of domestic, organic and operational waste generated both at the Base and by supply vessels. Waste handling, storage and disposal practices will be undertaken in accordance with applicable port requirements, national legislation and MARPOL requirements.

4.2.5 Waste reporting and recordkeeping

4.2.5.1 Reporting Requirements

The Shore base's Waste Disposal Logs are used to record waste shipped to port and then from port to its final disposal site. The Materials Supervisor shall ensure the Waste Disposal Logs are maintained and shall obtain shipping documentation for long term transport.

4.2.5.1.1 Waste reporting

Materials Supervisor shall collect the waste disposal logs at the beginning of each month for the previous month and email the EHS Coordinator.

4.2.5.1.2 Waste spill

Contractors shall report all spills to Base Manager and Materials Supervisor. Within the Port of Igoumenitsa there is an environmental supervisor and a safety department.

Verbal notice shall be provided when Environmental Officer of the Port Authority become involved.

Any noncompliance that may endanger health or the environment shall be reported. Such report shall be given verbally as soon as reasonably practicable and in writing within 24 hours from the time the noncompliance is known to the Base Manager, EHS Team Lead and Corporate EHS International Manager. The Incident Reporting Procedures shall be followed, if applicable.

4.2.5.1.3 Non-conformance

Non-conformance(s) and corrective action(s) noted by contractors or personnel shall be reported to the Shore base manager and Materials Supervisor. Non-conformities that are not resolved immediately should be noted, investigated, and brought to resolution. The Corrective Action Request (CAR) Form shall be used in when non-conformity requires time and potential approvals to be resolved. The Base Manager and Materials Supervisor shall routinely review reported non-conformance reports to ensure appropriate corrective actions are being implemented on time.

4.2.5.2 Recordkeeping requirements

The Waste Management Plan and all relevant documentation such as SDSs, shipping waste manifests, sampling reports, etc. shall be stored in a central location at the base. This includes but is not limited to the following:

- Current Waste Management Plan including Waste Register, Copies of the Waste Manifests, Disposal Log, Shipping Paperwork and supporting documentation
- Monthly waste reports, submitted to the Corporate EHS International Manager
- Log of non-conformances
- Any permits, approvals, notifications or regulatory authorisations applicable to the Project waste management activities

These records shall be retained for a period of five (5) years at a minimum. Then it shall be retained as specified by Energean's Corporate Record Retention Schedule.

4.2.6 Training

Training, initial and ongoing, is provided to ensure all environmental policies and procedures can be effectively achieved and managed.

The training is the responsibility of the operations supervisor and will include orientation training, ongoing task specific training, emergency drills and spill response.

4.3 Onshore Waste Quantities

Onshore activities will be limited to logistical support at the Project's shore base at the Port of Igoumenitsa, including storage, vessel support, and coordination activities. No industrial or maintenance works are planned at the shore base.

Waste received at the shore base will be temporarily stored in designated areas prior to transfer to licensed contractors, in accordance with site procedures and regulatory requirements for storage, handling and segregation.

Waste quantities are driven by logistical handling, storage and packaging activities and are consistent with the aggregated phase-based estimates presented in Table 4-2. Total quantities are based on indicative weekly generation rates scaled to project phase durations (mobilisation, drilling and demobilisation).

All onshore wastes will be managed through the shore base waste management system and transferred to authorised facilities. Table 4-2 presents the waste expected to be generated by temporary shore-based logistics and welfare activities. It excludes waste generated offshore and backloaded through the Supply Base, which is reported separately in Sections 3.3.2 and 3.3.3. Backloaded offshore waste will be temporarily staged at the Supply Base but will not be counted again as onshore-generated waste.

Table 4-2: Estimated Non-Hazardous Waste – Onshore Base

WASTE STREAM	INDICATIVE WEEKLY GENERATION RATE (KG/WEEK)			ESTIMATED TOTALS (KG)		
	MOBILISATION	OPERATIONS SUPPORT	DEMobilISATION	MOBILISATION (8 WEEKS)	OPERATIONS SUPPORT (67 DAYS)	DEMobilISATION (8 WEEKS)
General non-recyclable	60	135	60	480	1,290	480
Paper, wood and cardboard	76	171	76	610	1,640	610
Plastic	5.6	8.4	5.6	45	80	45
Metal	117.5	176.3	117.5	940	1,690	940
Food waste	28	63	28	220	600	220
			Total	2,300	5,300	2,300

At the onshore logistics base, a maximum of six personnel is expected to be present during operational activities. Municipal waste generated from routine office and welfare activities, including food packaging, paper products and general housekeeping waste, is conservatively estimated at approximately 10–12 kg/day. These wastes will be managed through the port's established waste management systems, including segregation, temporary storage and transfer to authorised waste management contractors for recycling, recovery or disposal.

Sanitary facilities for shore base personnel will be provided by portable chemical toilets located within the designated operational area of the Supply Base. The chemical toilets will be supplied, maintained and serviced by a licensed contractor at regular intervals to ensure hygienic conditions and adequate capacity. Waste collected from the units will be removed and transported by authorised service providers for treatment and disposal at appropriately licensed facilities in accordance with applicable national regulations and port requirements. Given the limited number of personnel and the temporary nature of the activity, wastewater volumes generated from these facilities are expected to be minor.

The quantification of the remaining waste streams anticipated to be generated at the onshore support base during the Project's operational phase (such as WEEE, batteries, spent lubricating oils, etc., as detailed in Table 4-1) is not possible at this stage, given that their generation is strictly event-driven and correlated with unscheduled maintenance or equipment replacement cycles. Nevertheless, these waste fractions are fully accounted for and seamlessly integrated into the compliance protocols and logistics framework of this Waste Management Plan.

4.4 Onshore Decommissioning Waste

Once the drilling campaign concludes and the MODU departs, the temporary logistics base will be gradually demobilised. All project-specific temporary facilities and equipment, including portable offices, storage units, handling tools, temporary fencing, signage, and barriers, will be dismantled and removed from the port area.

Remaining materials and backload items will be processed for return to suppliers, transfer to licensed waste management facilities, or transport to other operational bases. Temporary signage, barriers, and traffic management systems installed for the project will be dismantled. The Project area will be inspected and left in the condition agreed with the Port Authority. Demobilisation activities will be conducted in accordance with environmental, health, and safety procedures, with particular attention to spill prevention, waste handling, and minimising disruption to ongoing port operations.

The Project will utilise existing facilities at the Igoumenitsa supply base and does not include construction of permanent onshore infrastructure. Upon completion of offshore activities, use of the logistics base for the Project will cease.

Any materials, equipment, or wastes associated with the drilling campaign will be removed from the site in accordance with operational procedures and applicable regulatory requirements.

All equipment and materials mobilised in support of the drilling campaign, including chemicals, drilling consumables, and wastes returned from offshore operations, will be removed from the logistics base in accordance with operational procedures and applicable regulatory requirements. Materials will be returned to suppliers, reused, or managed through appropriate waste handling and disposal routes in accordance with applicable requirements.

During the demobilisation phase of the onshore logistics base, no new waste streams or European Waste Catalogue (EWC) codes are anticipated to be generated beyond those previously identified in the operational phases; consequently, all waste management, handling, and disposal protocols remain unchanged and will be executed in accordance with established project waste management procedures.

5 Waste Management Scheme

Following the detailed description of waste classification, quantification and management of the project's waste streams presented in §3 (Offshore) and §4 (Onshore), this section delivers a consolidated operational overview of the entire waste logistics chain. It maps the comprehensive, step-by-step flow of each waste stream from its precise point of generation to its final recovery, treatment, or disposal.

The overall Waste Management Scheme is designed to ensure strict source segregation, absolute traceability, and uncompromised environmental compliance during the mobilization, drilling, and demobilization phases of the Asopus-1 exploratory campaign. To provide a clear, actionable reference for daily operations and regulatory auditing, the master framework is synthesized in the comprehensive matrix below. This matrix tracks each waste stream by its official European List of Waste (ELW) code, detailing its onshore/offshore origin, intermediate containment requirements, and authorized final disposal or recovery pathways.

5.1 Operational Waste Management Flow

- **Waste Generation and Segregation at Source:**

Waste is generated at multiple operational points, primarily on board the Mobile Offshore Drilling Unit (MODU), support vessels, and associated onshore logistics and staging areas. At the point of generation, waste streams are segregated according to their classification as hazardous or non-hazardous, and further separated by waste type in accordance with the established waste handling procedures. Clear labeling, designated containers and color-coded segregation systems, where applicable, are used to prevent cross-contamination and facilitate safe subsequent handling.

- **Collection and Internal Transfer:**

Waste generated in operational areas is collected by trained personnel on a routine basis and transferred to the designated temporary storage locations within the MODU or at the onshore base. Internal handling is carried out using appropriate equipment and procedures to avoid spillage, leakage, exposure or damage to waste containers. Special care is taken for hazardous waste, oily waste and potentially contaminated materials, which are managed separately from general non-hazardous waste.

- **Temporary Storage:**

All waste is temporarily stored in designated areas prior to offloading, transport or treatment. Offshore storage areas are arranged to provide secure containment, segregation, adequate identification and safe access for handling and inspection. Storage conditions are maintained in accordance with applicable safety, environmental and operational requirements, with particular attention to the containment of hazardous materials, liquids and waste requiring special handling. Waste is retained in temporary storage only for the period necessary to allow scheduled backloading or transfer to approved reception facilities.

- **Backloading and External Transfer:**

Waste is transferred from the MODU to support vessels or directly to shore-based reception facilities through controlled backloading operations. These transfers are planned in coordination with the drilling contractor, marine logistics provider and the onshore waste management chain to ensure continuity of containment and traceability. All waste movements are accompanied by the appropriate documentation and are performed in accordance with the relevant maritime, port and waste transport requirements.

- **Onshore Reception and Intermediate Handling:**

Upon arrival at the designated onshore facility or port reception area, waste is inspected, recorded and directed to the appropriate temporary holding area, treatment route or licensed contractor. Waste requiring further segregation, bulking, packaging or consolidation is handled at the onshore stage before final transport to authorised recovery, treatment or disposal facilities. Waste acceptance criteria, transport documentation and handover procedures are applied to ensure full chain-of-custody control.

- **Transport to Licensed Facilities:**

Waste is transported by duly licensed collectors to authorised facilities for recovery, treatment or disposal, depending on the nature and classification of the waste. Hazardous waste is transferred only to licensed facilities equipped to manage the relevant waste stream in compliance with applicable legal and technical requirements. Non-hazardous waste is directed to approved recovery or disposal routes, with priority given to reuse, recycling and recovery wherever feasible.

- **Recovery, Treatment and Final Disposal:**

Where practicable, waste is sent for recovery or recycling in accordance with the waste hierarchy and the applicable regulatory framework. Waste that cannot be recovered is treated and/or disposed of at authorised facilities using environmentally sound methods. Final disposal routes are selected based on waste classification, physical and chemical characteristics, and regulatory acceptance criteria.

- **Monitoring, Reporting and Continuous Improvement:**

Waste movements, quantities, storage durations, contractor handovers and final disposal routes are monitored throughout the Project. Records are maintained to ensure traceability and support internal reporting, compliance verification and regulatory documentation. The performance of the waste management system is reviewed regularly so that corrective actions, operational improvements and additional training can be implemented where required.

5.2 Waste Management Scheme Matrix

To synthesize these operational steps into a structured and easily auditable reference framework, the operational flow for each specific waste stream is detailed below. Table 5-1 acts as the core operational index, tracking each waste category by its official European List of Waste (ELW) code and defining its precise management pathway from the offshore or onshore generation point down to its final approved regulatory destination.

Table 5-1: Waste Management Scheme Matrix

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
01 05 04	freshwater drilling muds and wastes	Offshore: Riserless WBM ¹⁴ & cuttings	N/A (Direct discharge)	None	N/A	None	None (Discharge) Direct seabed discharge ¹⁵)
		Offshore: Riser-Based WBM	Continuous routing through closed-circulating system	MODU Mud Tanks	N/A	None	None (Discharge) Discharge 12m below sea level ¹⁶)
		Offshore: Riser-Based Cuttings	N/A (Direct discharge)	None (Directly routed to discharge chute)	N/A	None	None (Discharge) Discharge 12m below sea level ¹⁶)
		Offshore: Well P&A: WBM inside wellbore and riser before displacing to seawater	Separate collection ¹⁷ / MODU's Dedicated Waste Storage Location	MODU Mud Tanks	N/A	None	None (Discharge) Batch discharge 12m below sea level ¹⁶)
01 05 99	Wastes not otherwise specified	Offshore: Excess cement (riserless)	N/A (Direct discharge)	None	N/A	None	None (Discharge (riserless)) Direct seabed discharge ¹⁵)
		Offshore: Excess cement (riser)	N/A (Direct discharge)	None	N/A	None	None (Discharge 12m below sea level)
		Offshore: Cement slurry surface discharges from residuals, e.g., testing, line flushing, excess volumes	N/A (Direct discharge)	None	N/A	None	None (Discharge) Direct sea discharge)
		Offshore: Bulk material transfer fugitive	N/A (Fugitive dry atmospheric dust)	None	N/A	None	<i>Atmospheric venting and natural dispersion during</i>

¹¹ External Collection refers specifically to waste pick-up from the onshore base at Igoumenitsa Port, which must be implemented in strict compliance with the Port Reception Facilities (PRF) regulations.

¹² «Treatment»: recovery or disposal operations, including preparation prior to recovery or disposal. Recovery means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. (Art. 3, DIRECTIVE 2008/98/EC)

¹³ In accordance with the Barcelona Convention Offshore Protocol and UNEP/MAP guidelines.

¹⁴ Seawater will be used for drilling fluid preparation and cementing operations

¹⁵ Seabed discharge applies only to riserless drilling sections, where drilling fluids and cuttings are discharged at the seabed in the immediate vicinity of the well location.

¹⁶ Subsea discharge refers to discharge of fluids and associated materials through the marine riser system at approximately 12 m below mean sea level.

¹⁷ «Separate collection»: the collection where a waste stream is kept separately by type and nature so as to facilitate a specific treatment (Art. 3, DIRECTIVE 2008/98/EC)

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
		emissions (less than 0.05 m ³)					<i>pneumatic bulk transfers of dry cement and barite from support vessels.</i>
		Offshore: BOP Hydraulic Fluids ¹⁸	N/A (conveyed through a pipe with a diameter of DN12)	None	N/A	None	None (Discharge) Direct seabed discharge)
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils	Offshore / Onshore: Waste Oil	Separate collection at source/ MODU's Dedicated Waste Storage Location	UN-approved steel drums	Supply vessels (PSVs) to onshore supply base / UN-approved steel drums	Offshore / Onshore: UN-approved steel drums	Collection (transportation) by the contracted Alternative Management System / Treatment facility
13 04 03*	Bilge oils from other navigation	Offshore: Oily mixtures from machinery spaces and any contaminated deck drainage on the Stena DrillMAX and support vessels	Separate collection at source/ MODU's Dedicated Waste Storage Location	Bilge tanks (processing through approved 15 ppm oily water separator (OWS) with oil content monitor and automatic stopping device)	N/A	None	None (Discharge) Discharge conditions recorded in Oil Record Book Discharge overboard only when the unit/vessel is en route, outside prohibited areas, and oil content of undiluted effluent is ≤ 15 ppm; any effluent > 15 ppm is automatically diverted/retained for shore disposal; no visible sheen at sea surface)
14 06 03*	Other solvents and solvent mixtures	Offshore / Onshore: Residual marine coatings, epoxy and anti-corrosion paints, paint thinners, cleaning solvents, degreasers, detergents	Separate collection at source/ MODU's Dedicated Waste Storage Location	UN-approved steel drums	Supply vessels (PSVs) to onshore supply base / Mini container	Offshore / Onshore: UN-approved drums	Collection (transportation) by authorized hazardous waste collection, transportation and management service contractors / Treatment facility
20 01 27 *	Paint, inks, adhesives and resins containing hazardous substances						
20 01 29 *	Detergents containing hazardous substances						

¹⁸ Discharges of BOP hydraulic control fluid, where they occur, are incidental, limited in volume, and highly diluted.

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
15 01 01	Paper and cardboard packaging	Offshore / Onshore: Paper and cardboard packaging waste	Separate collection at source/ MODU's Dedicated Waste Storage Location	Compactor bags	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore: Skip containers	Collection (transportation) by Port Reception Facilities and/or Igoumenitsa Municipality / Treatment facility
15 01 05	Composite packaging	Offshore / Onshore: Packaging made of two or more layers of different materials that cannot be separated by hand				Onshore: Bin EN 840-2/5/6	
20 01 01	Paper and cardboard	Offshore / Onshore: Paper Waste (Office paper, newspapers, non-packaging cardboard)					
15 01 02	Plastic packaging	Offshore / Onshore: Plastic packaging waste	Separate collection at source/ MODU's Dedicated Waste Storage Location	Compactor bags	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore: Skip containers	Collection (transportation) by Port Reception Facilities and/or Igoumenitsa Municipality / Treatment facility
20 01 39	Plastics	Offshore / Onshore: Plastic Waste (Bottles, non-packaging plastics)	Separate collection at source/ MODU's Dedicated Waste Storage Location			Onshore: Bin EN 840-2/5/6	
15 01 03	Wooden packaging	Offshore / Onshore: Wood packaging waste	Separate collection at source/ MODU's Dedicated Waste Storage Location	Skip containers	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore: Skip containers	Collection (transportation) by Port Reception Facilities and/or Igoumenitsa Municipality / Treatment facility
20 01 38	Wood other than that mentioned in 20 01 37	Offshore / Onshore: Wood waste (broken pallets)	Separate collection at source/ MODU's Dedicated Waste Storage Location			Onshore: Bin EN 840-2/5/6	
15 01 04	Metallic packaging	Offshore / Onshore: Metallic	Separate collection at source/	Skip containers	Supply vessels (PSVs) to onshore supply	Offshore: Skip containers	Collection (transportation) by Port Reception

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
		packaging waste	MODU's Dedicated Waste Storage Location		base / Skip containers	Onshore: Bin EN 840-2/5/6	Facilities and/or Igoumenitsa Municipality / Treatment facility
20 01 40	Metals	Offshore / Onshore: Metal waste (aluminium beverage cans, clean scrap metal parts)	Separate collection at source/ MODU's Dedicated Waste Storage Location				
15 01 07	Glass packaging	Offshore / Onshore: Glass packaging waste	Separate collection at source/ MODU's Dedicated Waste Storage Location	Compactor bags	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore: Skip containers Onshore: Bin EN 840-2/5/6	Collection (transportation) by Port Reception Facilities and/or Igoumenitsa Municipality / Treatment facility
20 01 02	Glass	Offshore / Onshore: Glass waste (bottles, jars)	Separate collection at source/ MODU's Dedicated Waste Storage Location				
15 01 10*	Packaging containing residues of or contaminated by hazardous substances	Offshore / Onshore: Empty pipe dope containers, empty chemical containers, empty paint cans, empty aerosol cans	Separate collection at source/ MODU's Dedicated Waste Storage Location	Compactor bags	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore / Onshore: UN-approved drums, UN-approved boxes and Skip containers	Collection (transportation) by Port Reception Facilities and/or authorized hazardous waste collection, transportation and management service contractors / Treatment facility
15 02 02*	Absorbents, filter materials, wiping cloths, protective clothing contaminated by hazardous substances	Offshore / Onshore: Contaminated pipe dope residues ¹⁹ , contaminated rags or absorbents, used filters / oil filters, oil-contaminated absorbents	Separate collection at source/ MODU's Dedicated Waste Storage Location	UN-approved drums, UN-approved boxes, portable pollution response unit containing big bags for	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore / Onshore: UN-approved drums, UN-approved boxes, portable pollution response unit containing big bags for	Collection (transportation) by Port Reception Facilities and/or authorized hazardous waste collection, transportation and management service contractors / Treatment facility

¹⁹ Incidental operational discharges of thread compounds (pipe and casing dope) are minimised through the application of best operational practices (e.g., using specialised applicator brushes to prevent over-doping) and are supported by supplier-provided environmental certification data.

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
				waste placement		waste placement	
16 02 11*	Discarded equipment containing chlorofluorocarbons, HCFC, HFC	Offshore / Onshore: Hazardous WEEE (A/C units, fridges, freezers, water coolers)	Separate collection at source/ MODU's Dedicated Waste Storage Location	Intermediate Bulk Container (IBC) and Skip containers	Supply vessels (PSVs) to onshore supply base / IBC - Skip containers	Offshore: IBC - Skip containers Onshore: WEEE Bin provided by Alternative Management System	Collection (transportation) by the contracted Alternative Management System / Treatment facility
20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	Offshore / Onshore: Small household-type electronic devices containing hazardous components					
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13	Offshore / Onshore: Non-hazardous WEEE (IT equipment, galley appliances, monitors)	Separate collection at source/ MODU's Dedicated Waste Storage Location	Open top Intermediate Bulk Container (IBC)	Supply vessels (PSVs) to onshore supply base / Open top IBC	Offshore: Open top IBC Onshore: WEEE Bin provided by Alternative Management System	Collection (transportation) by the contracted Alternative Management System / Treatment facility
16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15	Offshore / Onshore: Non-hazardous electrical components (Cables, fuses, circuit boards)					
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	Offshore / Onshore: Small household-type electrical and electronic appliances from accommodation and offices					
16 06 01*	Lead batteries	Offshore / Onshore: Batteries	Separate collection at source/ MODU's Dedicated Waste Storage Location	Drums, packs and crates	Supply vessels (PSVs) to onshore supply base / Mini containers	Offshore: Mini containers Onshore: Batteries Bin provided by Alternative Management System	Collection (transportation) by the contracted Alternative Management System / Treatment facility
16 06 02*	Ni-Cd batteries						
16 06 04	Alkaline batteries (except 16 06 03)						
16 06 05	Other batteries and accumulators						
20 01 33*	Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators						

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
	containing these batteries						
20 01 34	Batteries and accumulators other than those mentioned in 20 01 33						
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection	Offshore: Medical waste (infectious materials, used gauze, needles, syringes)	Separate collection at source / MODU's Hospital	Clinical Waste Bins, Sharps Containers	Supply vessels (PSVs) to onshore supply base / Mini containers	Offshore: Mini Containers	Collection (transportation) by authorized hazardous waste collection, transportation and management service contractors / Treatment facility
20 01 08	Biodegradable kitchen and canteen waste	Offshore: Food waste (MARPOL Annex V)	Separate collection at source / MODU's Galley (line overboard)	None	N/A	-	None (Discharge) Macerated to a particle size of ≤25 mm and flushed overboard only beyond the legal distance-from-land requirements)
		Onshore: Biowaste	N/A	None	N/A	Onshore: Bin EN 840-2/5/6	Collection (transportation) by Igoumenitsa Municipality / Treatment facility
15 01 09	Textile packaging	Onshore: Textile packaging waste, textile waste	N/A	None	N/A	Onshore: Bin EN 840-2/5/6 or Textiles Bin provided by Alternative Management System	Collection (transportation) by the contracted Alternative Management System / Treatment facility
20 01 11	Textiles						
20 01 21*	Fluorescent tubes and other mercury-containing waste	Offshore / Onshore: Fluorescent tubes (WEEE)	Separate collection at source / MODU's Dedicated Waste Storage Location	Drums	Supply vessels (PSVs) to onshore supply base / Drums	Offshore: Drums Onshore: WEEE Bin provided by Alternative Management System	Collection (transportation) by Port Reception Facilities and/or the contracted Alternative Management System / Treatment facility
20 01 25	Edible oil and fat	Offshore: Used cooking oil (MARPOL Annex V)	Separate collection at source / MODU's Galley	Used cooking oil waste drums	Incinerate on board or backload to Supply vessels (PSVs) to onshore supply base	Offshore: Used cooking oil waste drums	Collection (transportation) by Port Reception Facilities and/or the contracted Alternative Management

ELW CODE	ELW DESCRIPTION	PROJECT WASTE STREAM (OFFSHORE / ONSHORE GENERATION)	COLLECTION / OFFSHORE TEMPORARY STORAGE	EQUIPMENT FOR OFFSHORE TEMPORARY STORAGE	INTERNAL TRANSPORTATION (OFFSHORE ► ONSHORE)	EQUIPMENT FOR ONSHORE TEMPORARY STORAGE (OFFSHORE AND ONSHORE GENERATED WASTE)	EXTERNAL COLLECTION ¹¹ (TRANSPORTATION) / TREATMENT ^{12, 13}
							System / Treatment facility
20 03 01	Mixed municipal waste	Offshore: Domestic waste, (MARPOL Annex V) Onshore: Mixed municipal waste	Separate collection / MODU's Dedicated Waste Storage Location	Compactor bags	Supply vessels (PSVs) to onshore supply base / Skip containers	Offshore: Skip containers Onshore: Bin EN 840-2/5/6	Collection (transportation) by Port Reception Facilities and Igoumenitsa Municipality / Treatment or disposal facility
20 03 04	Septic tank sludge	Onshore: Wastewater from chemical toilets	N/A	None	N/A	None	Collection (transportation) by authorized waste collection, transportation and management service contractors / Treatment facility
20 03 07	Bulky waste	Onshore: Non-hazardous bulky waste	N/A	None	N/A	Onshore: In bulk	Collection (transportation) by the Igoumenitsa Municipality or private service provider / Treatment facility
20 03 99	Municipal wastes not otherwise specified	Offshore: Sanitary wastewater, grey water (MARPOL Annex IV)	N/A (Collection in sewage system; treatment in IMO approved sewage treatment plant)	None	N/A	None	None (Discharge) Discharge of treated sewage permitted only when the approved plant is operating and effluent quality meets IMO performance standards and flag state criteria; otherwise retained on board for shore reception)

A regulatory distinction is maintained between waste streams and routine operational marine discharges generated onboard the Stena DrillMAX. In accordance with international maritime jurisprudence and European environmental law, high-volume operational liquid streams—specifically ballast water, machinery cooling water, desalination brine, and chemical-free boiler blowdown—are legally excluded from classification under the European List of Waste (ELW).

The statutory boundary separating land-based waste management frameworks from permitted maritime operational discharges is established under Article 2 of Directive (EU) 2019/883, transposed into Greek national legislation via Joint Ministerial Decision (JMD) 3123.1/81938/2022 (GG B' 6085/29.11.2022). Pursuant to Article 2(3) of the Directive, the definition of "waste from ships" is strictly limited to substances falling under the scope of Annexes I, II, IV, V, and VI of the IMO MARPOL 73/78 Convention that are intended for physical delivery to Port Reception Facilities (PRFs). Consequently, any continuous or intermittent discharge executed in strict compliance with MARPOL parameters is managed via the vessel's Safety and Environmental Management Systems rather than land-based waste registries.

In the event that any unforeseen hazardous or non-hazardous waste stream, not explicitly identified within the Master Compliance Matrix, is generated during the mobilization, drilling, or decommissioning phases of the Project, the following immediate mitigation protocol shall be activated:

- **Regulatory Categorization:** The waste stream shall be immediately characterized and classified according to its chemical/physical properties under the appropriate code of the European List of Waste.
- **Source Isolation:** The material must be segregated at source to prevent cross-contamination and transferred directly to the designated offshore temporary waste storage area or the onshore base.
- **Containment Specification:** Storage shall utilize appropriate, certified, and UN-approved equipment aligned with the specific characteristics of the waste.
- **Compliance Integration:** The Operator shall be formally notified to secure a licensed waste management contractor, ensuring full chain-of-custody documentation, shipping manifest alignment, and legal compliance with Greek Law 4819/2021 before any external transfer takes place.

6 Waste Management Plan Implementation

6.1 Monitoring

The present Waste Management Plan (WMP) constitutes the mandatory framework for the implementation and execution of the Project's integrated waste management system. It serves as the primary reference document, setting out binding directions for integrated waste management, actions to be implemented, and operational objectives to be met.

To ensure continuous improvement and adaptation to new data, the WMP shall undergo formal reviews, with necessary modifications or updates implemented as required. The specific form and baseline frequency of monitoring shall be finalized prior to the commencement of operations and updated dynamically as the project progresses.

Monitoring the achievement of WMP objectives shall be carried out through systematic data collection from the waste management system. This data shall include both quantitative and qualitative characteristics to enable detailed performance tracking. The data collected by the respective waste collection, transport, and management staff and operators shall consist, indicatively and not exhaustively, of:

- Quantities of collected waste (by ELW code)
- Qualitative analysis of generated and collected waste
- Financial data and related cost efficiency analyses (e.g., cost per tonne)
- Number, type, and attendance rates of staff awareness-raising actions

Evaluation of the achievement of WMP objectives shall be measured through the continuous tracking of the following key performance indicators (KPIs):

- Reduction rate of total waste generation
- Landfill diversion rate (reduction of waste quantities sent to landfill)
- Increase in the volume of waste collected by alternative waste management systems
- Reduction in the quantity of waste collected that falls outside alternative waste management systems
- Reduction of contamination rates in segregated recyclable materials

6.2 Inspection and Control

The Project Operator shall carry out daily operational checks and inspections to ensure that all collection and temporary storage equipment and facilities remain in optimal condition, and that the procedures of this WMP are strictly followed.

Furthermore, the Project Operator shall conduct regular, formal compliance inspections including, but not limited to, the following core areas:

- Practical field implementation of the WMP across all sectors
- Adherence to operational procedures outlined in this plan
- Accurate and immediate recording of hazardous and non-hazardous waste
- Timely reporting of hazardous and non-hazardous waste in the Electronic Waste Registry (HMA)
 - Verification of required waste transport documentation

In the event of any audit findings, deviations, or instances of non-compliance, formal corrective and preventive measures shall be implemented immediately, with follow-up verifications recorded.

6.3 Annual Waste Generation Report

In accordance with Article 53 of Law 4819/2021, the Project Operator shall submit comprehensive annual data and information regarding the generation and management of all applicable waste types covered by the European Waste Catalogue (EWC) to the Electronic Waste Registry (HMA) of the Ministry of Environment and Energy (YPEN).

This mandatory submission shall explicitly detail:

- The waste producer identification
- The specific type of waste (classified by EWC code)
- The exact quantities generated and transferred
- The licensed destination waste management facility
- The specific disposal or recovery operations (D/R codes) utilized

7 Appendix 1: Waste Classification

The evaluation and classification of wastes are applied to each separate waste stream produced, after obtaining a representative sample. In the case where more than one type of waste exists, each type must be assessed separately. This ensures that any hazardous waste batches or elements:

- are not misclassified as non-hazardous due to mixing (dilution) with other wastes.
- are identified timely to prevent mixing with other wastes, e.g., in containers, bags, piles, or bins.

Only mixed municipal waste originating from households is exempt from these obligations.

Waste classification must be performed according to the instructions contained in the “Commission Notice on technical guidance for the classification of waste C/2018/1447.”²⁰

Briefly, the general waste classification stages are as follows:

Stage 1: Is the Waste Framework Directive 2008/98/EC (WFD), which has been incorporated into Greek legislation by Law 4819/2021 (Government Gazette 129/A/23.07.2021), applicable?

- First, it must be confirmed that the substance or object under consideration constitutes waste (as defined by the WFD). Determining whether the substance or object is waste under the WFD is a prerequisite for further hazard assessment. For this particular assessment, the WFD Guidance provides guidance on the key definition of ‘discarding’ under the WFD, and related concepts under the WFD such as ‘by-product’ and ‘end-of-waste’.
- Second, it must be checked whether certain specified waste streams are excluded from the WFD scope. Even if the substance or object is considered waste, it must be evaluated whether any of the exemptions in Article 2 of the WFD apply. The WFD guidance provides detailed clarifications on selected exemptions. If an exemption applies, neither the WFD nor the waste list applies (an exceptional case is the mining waste directive, which is outside the WFD scope but requires classification according to the waste list if conditions apply).

All waste streams not explicitly excluded from the WFD scope must be classified according to the WFD and the waste list, following the approach outlined in the technical guidance note. This obligation also applies when additional legislation exists for a given waste stream, as referenced in Article 2(4) of the WFD.

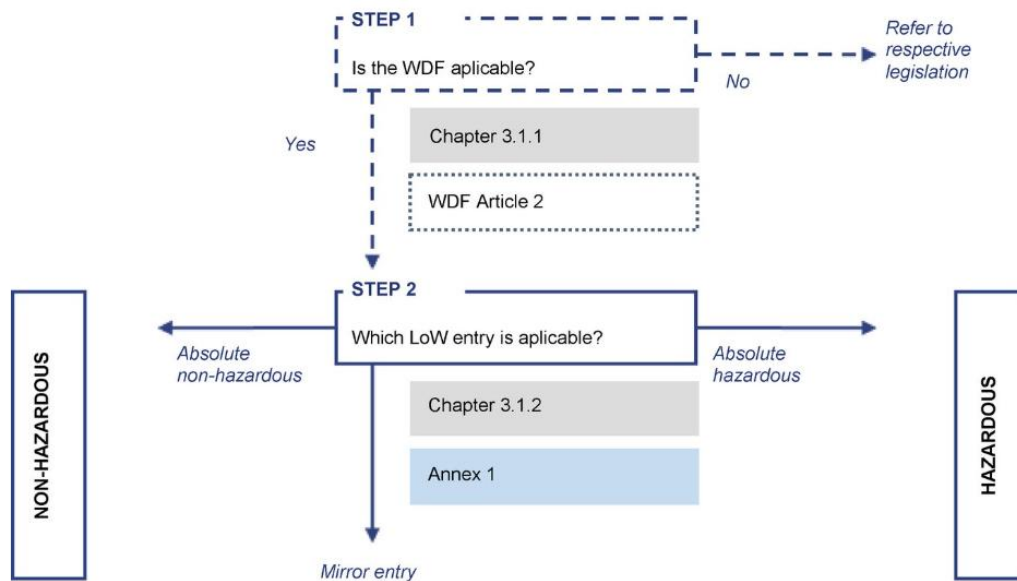
Stage 2: Which entry of the List of Waste (LoW, 2000/532/EC (L 226), as amended) is applicable?

The LoW contains 20 chapters (two digit codes), further divided into sub-chapters (four digit codes) and entries (six digit codes). The assignment of a specific entry is made by following the procedure for use of the list of waste. This procedure creates an order of precedence for chapters. Any waste which can be identified by an entry marked with an asterisk (*) should be considered as hazardous. Wastes defined by all other entries are considered non-hazardous.

To complete Step 2 and identify the applicable entry or entries of the LoW, Upon completing the first two stages, the following should be known:

- whether the substance or object falls under the WFD and the waste list, and
- whether an “absolute” classification (Absolute Hazardous - AH or Absolute Non-Hazardous - ANH) or a “mirror” classification (Mirror Hazardous - MH or Mirror Non-Hazardous - MNH) applies, and consequently, whether further assessment (Stages 3 to 5) is required.

²⁰ <https://eur-lex.europa.eu/legal-content/EL/ALL/?uri=CELEX%3A52018XC0409%2801%29>



Stage 3: Are sufficient data available regarding the composition of the waste to determine whether it exhibits hazardous properties, either through calculation or testing as described in Stage 4.

Collecting adequate information on the presence and content of hazardous substances in the waste in order to determine whether the waste may exhibit one or more of the hazardous properties HP1 to HP15 is an essential stage of waste classification. Certain information on the composition of the waste is required regardless of the method used to assess the hazardous properties (calculation or testing), as described in Stage 4. There are several ways to obtain information on the relevant composition of the waste, the hazardous substances potentially present, and the hazardous properties that may arise:

- I. Information on the production process/physical or chemical process generating the waste and on related input substances and intermediates, including expert judgement (useful sources may include BREFs, industry handbooks, process descriptions, and lists of input materials issued by the producer, etc.),
- II. Information from the original producer of the substance or object before it became waste, e.g. safety data sheets (SDS), labels, or product sheets (Annex 2 of the Guidance),
- III. Waste analysis databases at Member State level,
- IV. Sampling and chemical analysis of the waste (see Annex 4 of the C/2018/1447 guidance).

Once information on the composition of the waste is collected, it becomes possible to assess whether the identified substances are classified as hazardous, i.e., whether they must be assigned hazard statements according to the criteria set out in the CLP Regulation.

CLP²¹ Regulation on Classification, Labelling and Packaging

The CLP Regulation sets out the criteria for the classification of substances and mixtures for hazardous properties. According to the CLP Regulation, waste is not considered a substance, mixture, or article. Nevertheless, the hazardous properties applied to waste are linked to the criteria in the CLP Regulation. Moreover, the classification of substances under CLP may be useful for the classification of waste.

Although Annex III of the WFD is based on the CLP Regulation, the criteria set out in the CLP Regulation have not been fully incorporated on a one-to-one basis. Instead, for waste classification purposes, it should be noted that some HP criteria in Annex III of the WFD refer directly to the hazard classes and categories under CLP, as well as to hazard statements and their associated classification criteria. Many mirror entries refer specifically to "hazardous substances." Substance classification is carried out in accordance with CLP, while the presence of hazardous substances in the waste must be assessed based on Annex III of the WFD (for further information, see Annex 3 of the Guidance). Furthermore, Table 3.1 of Part 3 of Annex VI of the CLP Regulation provides a set of official harmonised classifications of substances. Where such harmonised classification is available, it must be used in the classification of waste (for information on this, see Annex 2 of C/2018/1447).

Stage 4: Does the waste exhibit any of the hazardous properties HP1 to HP15²²?

Annex 3 of C/2018/1447 and Annex III of the WFD describe the 15 properties (HP1 to HP15) that render waste hazardous.

By the end of Stage 3, sufficient information should exist regarding the relevant composition of the waste under consideration. This means that the hazardous substances present in the waste and their classification (e.g. whether they correspond to relevant hazard statement codes under the CLP Regulation) should be known to a sufficient degree to allow application of at least one of the following methods to determine whether the waste exhibits hazardous properties:

- **Calculation:** if the amount of hazardous substances in the waste equals or exceeds the threshold values based on hazard statement codes (individually, depending on properties HP4 to HP14 – see Annex 3 of C/2018/1447),
- **Testing:** to determine whether the waste exhibits hazardous properties or not.

Annex 3 of C/2018/1447 provides detailed descriptions and guidance on how to assess each of the hazardous properties HP1 to HP15 via calculation or testing.

With regard to the calculation method, it should be noted that the content values of hazardous substances in the waste, as determined, e.g. by sampling and chemical analysis, must be compared to the concentration limits listed in Annex III of the WFD. Furthermore, it must be explicitly stated that according to Article 7(4) of the WFD, dilution or mixing of the waste in order to reduce the initial concentration of hazardous substances is not permitted. It is also noted that the concentration limits in Annex III of the WFD do not apply to pure metal alloys in solid form, provided they are not contaminated with hazardous substances. Further information on metal alloy classification is available in Annex 1, section 1.4.6 of C/2018/1447.

²¹ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.

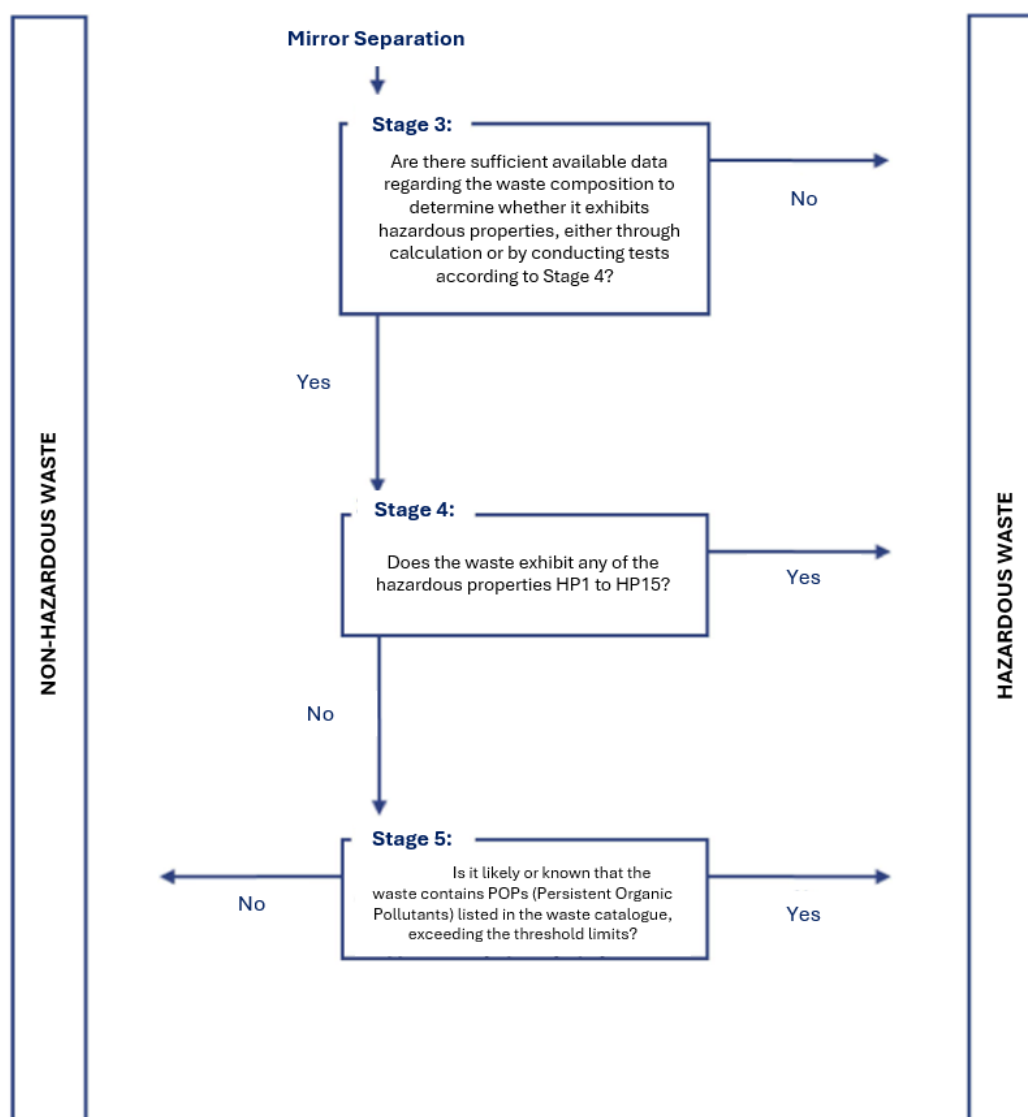
²² The 15 properties (HP1 to HP15) of waste that render it hazardous, as set out in Annex III of the Waste Framework Directive (WFD) and Annex III of Law 4819/2021.

Further guidance on waste sampling and chemical analyses for the purpose of applying the calculation method is provided in Annex 4 of C/2018/1447.

Direct testing: In certain cases, it may be useful to determine whether the waste exhibits a specific hazardous property (e.g., physical properties such as HP1 “Explosive,” HP2 “Oxidising,” or HP3 “Flammable”).

According to the Waste List Annex, “Where a hazardous property of the waste has been assessed both by testing and by using the concentrations of hazardous substances set out in Annex III of Directive 2008/98/EC, the test results shall prevail.”.

Finally, if the waste exhibits one or more of the 15 hazardous properties, it must be assigned the relevant MH (Mirror Hazardous) entry. If, on the other hand, it does not exhibit any hazardous properties, then Stage 5 must be carried out to assess whether the waste contains certain specific POPs in quantities above the relevant thresholds. This is the final stage before a decision can be made to assign the MH or MNH (Mirror Non-Hazardous) entry to the waste under consideration.



Stage 5: Is it likely or known that the waste contains POPs listed in the Waste List Annex?

Stages 3, 4, and 5 must be used when selecting the appropriate mirror entry. Moreover, these sections may also be used to identify hazardous properties of waste related to AH (Absolute Hazardous) entries, as such information may be required to ensure compliance with the provisions set out in Article 19 of the WFD (Article 45 of Law 4819/2021) regarding proper labelling of hazardous waste (e.g., for completing waste transfer tracking forms).

Upon completion of Stages 3 to 5, it should be finally determined whether the waste under consideration contains hazardous components and whether it exhibits one or more hazardous properties (HP1 to HP15), and/or whether it contains relevant POPs. Subsequently, a decision can be made on whether the waste is hazardous or non-hazardous.

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