



DOCUMENT TITLE:

WASTE RECEPTION AND HANDLING PLAN

SCOPE:

MARINA PUNAT d.o.o.

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GOAL

According to Articles 56, 56a, and 58 of the Maritime Code (NN 181/04, 76/07, 146/08, 61/11, 56/13, 26/15, 17/19), Article 3, paragraph 1, item 7 of the Regulation on the Conditions to Be Met by Ports (NN 110/04), Article 61, paragraph 1 of the Ordinance on the Conditions and Methods for Maintaining Order in Ports and on Other Parts of Internal Waters and Territorial Sea of the Republic of Croatia (NN 72/21), Directive (EU) 2019/883 of the European Parliament and of the Council of 17 April 2019 on Port Reception Facilities for the Delivery of Waste from Ships, Directive 2010/65/EU of the European Parliament and of the Council of 20 October 2010 on Reporting Formalities for Ships Arriving in and/or Departing from Ports of the Member States, MARPOL 73/78 as amended, and the Waste Management Act (NN 84/21, 142/23), as well as following the authority of the Management of the Company Marina Punat d.o.o., Punat, Puntica 7, the following Plan is adopted on 21.08.2026 by the Company Management:

VESSEL WASTE RECEPTION AND HANDLING PLAN

for the area under the authority of Marina Punat d.o.o.

1. INTRODUCTION (GENERAL PROVISIONS)

- 1.1. Waste Reception and Handling Plan (from now on referred to as the "Plan") applicable to the area of the specialized port – nautical tourism port "Marina Punat" – under the authority of the Company Marina Punat d.o.o. (from now on referred to as the "Marina") regulates the reception and handling of waste from vessels in the area under the Marina's authority. It applies to all vessels, irrespective of the flag under which they sail, that dock and stay in the area of the specialized port – nautical tourism port "Marina Punat".
- 1.2. The area under Marina's authority includes the specialized port – nautical tourism port "Marina Punat" – the area used by the Marina (land and sea) following the Agreement on the Concession of Maritime Property for the Economic Use of the Specialized Port – Nautical Tourism Port Punat concluded with the Government of the Republic of Croatia on 19 November 1999, as well as the area used by Marina Punat d.o.o. for conducting its activities outside the area covered by the maritime property concession.
- 1.3. According to the Ordinance on the Categorization of Nautical Tourism Ports and the Classification of Other Facilities for the Provision of Vessel Berthing and Accommodation Services (NN 120/19) as part of the formal and legal establishment of the port system of the Republic of Croatia, Marina Punat is classified as a specialized port – nautical tourism port "Marina Punat" – of economic interest to the Republic of Croatia as well as a facility providing vessel berthing and accommodation services within the dry marina.



1.4. The Plan regulates:

- 1.4.1. the reception and handling of waste from vessels entering the Marina by sea or land, or resulting from the activities conducted by the Marina and its Users;
- 1.4.2. the methods and procedures for the management of accumulated waste;
- 1.4.3. the protection of the marine environment against the discharge or dumping of waste from vessels as well as the protection of the Marina's land area against pollution.

1.5. The Map of the Marina featuring the sites of the Port Waste Reception Facilities (as part of the Vessel Waste Reception and Handling Plan), including descriptions of the types of vessel-generated waste that can be received, along with instructions on utilizing said facilities, and a list of operators and services available, is published on the Marina Punat d.o.o.'s official website.

1.6. This Plan has been drawn up for the needs of the specialized port – nautical tourism port “Marina Punat” and its land and marine parts following the Ordinance on the Conditions and Methods for Maintaining Order in Ports and on Other Parts of Internal Waters and Territorial Sea of the Republic of Croatia (NN 72/21) (hereinafter referred to as the “Regulation”). Prior consultations were held with the authorized operators of the Port Waste Reception Facilities, including Ponikve eko otok Krk d.o.o., Ponikve voda d.o.o., Dezinskecija d.o.o. Rijeka, Crikvenica – Opatija – Eko d.o.o., Metis d.d., port users, local authorities, authorized collectors, and other interested persons and institutions.

1.7. The Concessionaire shall conduct regular consultations with port users, local authorities, authorized collectors, representatives of civil society, and other interested persons and institutions. Announcements and invitations regarding consultations are published on the Concessionaire's official website. Interested persons are given a deadline of 15 days from the date of the invitation to submit their statements via the Concessionaire's official website/bulletin board. The final consultation session for the current year should be scheduled no later than January 31st of the following year. Additional consultations will be organized before audits or Plan updates.

1.8. In environmental management, the application of the ISO 14001 standard is ensured, for which the Company holds a valid certificate issued by an authorized certification body. Accordingly, this Plan has also been prepared in compliance with the requirements of the specified standard.

2. GENERAL INFORMATION ABOUT THE PORT

2.1. According to the classification of ports based on the Regulation on the Classification of Ports Open to Public Transport and Specialized Ports (NN 110/04 and NN 82/07), Marina Punat is classified as a specialized port in the category of ports significant for the Republic of Croatia based on its size and importance, as well as a nautical tourism port based on its activities. According to the Ordinance on the Categorization of Nautical Tourism Ports and the Classification of Other Facilities for the Provision of Vessel Berthing and Accommodation Services (NN 120/19), the nautical tourism port “Marina Punat” is classified as a marina. According to the Decision on Categorization, Class Up/I-335-05/16-09/1, Reg. No. 529-03-16-7, dated 9 May 2016, the Marina has a permanent capacity of 1,300 berths in total, including 1,000 in the water and 300 on land. Their size matches vessel dimensions, although the capacity may vary by up to 20% as a result of market demands. Moreover, its services, infrastructure, and offer meet the requirements for the 4-Anchor category. It is located on the eastern side of the Puntarska draga bay on the island of Krk, in the town of Punat.

2.2. Given the intended purpose and nature of traffic in the special purpose port – the nautical tourism port Marina Punat, ships with a gross tonnage exceeding 300 or yachts with an overall length of 45 meters or more, to which the obligation of submitting advance waste notification pursuant to Article 64 of the Ordinance on the Conditions and Manner of Maintaining Order in Ports and Other Parts of the Internal Waters and Territorial Sea of the Republic of Croatia would apply, do not call at the port in regular traffic. Vessels normally using the port belong to categories exempted from the specified obligation pursuant to Article 65 of the mentioned Ordinance.



3. DEFINITIONS

The following definitions are used for this Plan:

- 3.1. **Waste Management** – the prevention and reduction of waste generation and its harmful effects on the environment and the treatment of waste following economic principles.
- 3.2. **Waste** – any substance or object identified according to the waste categories prescribed in the Annexes to MARPOL 73/78 and the Waste Management Act (NN 84/21 with all subsequent amendments), which the possessor has to or intends to dispose of.
- 3.3. **Waste Information Follow-Up Sheet** – a form prescribed in the Ordinance on Waste Management (NN 81/20).
- 3.4. **Port** – a seaport, i.e. a sea area and land area directly connected to the sea, with built-up and undeveloped shores, breakwaters, devices, installations, and other facilities intended for mooring, anchoring, and protection of yachts and boats, loading and unloading of passengers and goods, storage and other handling of goods, production, refining and finishing works on ships, yachts, and boats, as well as other economic activities associated with said activities from an economic, transport or technical standpoint.
- 3.5. **MARPOL 73/78** – International Convention for the Prevention of Pollution from Ships, dated 1973, as amended by the Protocol of 1978 and all subsequent amendments.
- 3.6. **Maritime Code** (NN 181/04, 76/06, 146/08, 61/11 56/13, 26/15, 17/19) and all subsequent amendments) – it serves to define the maritime and underwater areas of the Republic of Croatia along with the legal relations regulated therein, the safety of navigation in inland sea waters and the territorial sea of the Republic of Croatia, the protection and preservation of natural marine resources and the marine environment, as well as fundamental material and legal relations with regard to vessels, contractual and other mandatory relations with regard to vessels, registration of vessels, limitations of the ship owner's liability, vessel lien, and vessel insurance. Unless otherwise stipulated in the Maritime Code, its provisions apply to vessels located or sailing in inland waters and the territorial sea of the Republic of Croatia.
- 3.7. **Vessel** – in the context of this Plan, any registered object (yacht or boat) intended for sailing which is the subject of the Permanent Berth Contract or the Transit Berth Contract.
- 3.8. **Owner** – a person designated as the owner of the Vessel in the relevant legal document.
- 3.9. **User** – a natural or legal person who has entered into the Permanent or Transit Berth Contract with the Marina.
- 3.10. **Attorney-in-Fact** – a person to whom the Vessel Owner or Vessel User has granted the authorizations outlined in a written Power of Attorney. The Marina reserves the right to evaluate the validity of the authorization within the Power of Attorney and may seek the approval of the Owner or User.
- 3.11. **Charter** – engaging in the economic activity of leasing a Vessel with or without crew.
- 3.12. **Berth** – an area in sea or on land temporarily assigned to the Berth User by the Marina for the accommodation of their Vessel.
- 3.13. **Permanent Berth Contract** – a contract entered into by the Berth User with the Marina, typically spanning a period of at least six months.
- 3.14. **Transit Berth Contract** – a contract entered into by the Berth User with the Marina for a generally



shorter period, up to 6 months.

- 3.15. **Yacht or boat length** – length overall (LOA).
- 3.16. **Port Waste Reception Facilities** – any fixed mobile or floating facility, equipment or vessel of the Concessionaire that is suitable for the reception of accumulated vessel-generated waste or cargo residues.
- 3.17. **Concessionaire** – for the purposes of this Plan, this is a legal or natural person who has been granted a concession for the area of the specialized port – nautical tourism port Marina Punt – and has entered into a contractual agreement for the reception of vessel-generated waste intended for transportation and processing or disposal.
- 3.18. **Accumulated Vessel-Generated Waste** – all waste, including fecal water and other residues other than cargo residues from the Vessel generated during its journey. This waste is covered by the MARPOL Annexes I, IV, and V. Accumulated cargo waste is defined in the Guidelines for the Application of the MARPOL Annex V.
- 3.19. **Municipal Vessel-Generated Waste** – vessel-generated waste exhibiting properties and composition akin to household waste.
- 3.20. **Hazardous Waste** – waste containing substances exhibiting any of the following properties: explosivity, reactivity, flammability, irritancy, harmfulness, toxicity, infectivity, carcinogenicity, mutagenicity, teratogenicity, ecotoxicity, oxidizing properties, corrosive properties, and the property of releasing toxic gases by chemical reaction or biological decomposition. Municipal, industrial, packaging, construction, electrical, and electronic waste as well as waste vehicles are categorized as hazardous waste if they exhibit hazardous waste properties.
- 3.21. **Non-Hazardous Waste** – waste that does not exhibit any of the properties associated with hazardous waste.
- 3.22. **Oily Wastewater** – liquid mixtures with oil content of any kind.
- 3.23. **Waste Oils** – liquid or semi-liquid products from various applications that have become unsuitable for their original purpose during use, storage or transport (e.g. used engine oil, sediment from heavy oil separators, oily water from engine room bilges, etc.).
- 3.24. **Fecal Water** – wastewater as defined in Regulation 1 of the MARPOL Annex IV.
- 3.25. **Waste Disposal** – the activity of controlled and permanent disposal of waste in designated facilities such as landfills or any other permanent waste disposal activity.
- 3.26. **Food Waste** – any spoilt or sound part of food, including fruits, vegetables, dairy products, poultry, meat products, and food scraps generated on board.
- 3.27. **Waste Processor** – a legal or natural person who carries out waste processing or disposal activities.
- 3.28. **Waste Processing** – the activity in which the properties of waste are changed during a physical, chemical or biological process, including sorting, with the aim of reducing its quantity and/or hazardous properties, thus facilitating its handling or improving its utilization.
- 3.29. **Waste Recycling** – the activity of reprocessing waste in the production process, including organic recycling, but not its utilization for energy purposes.
- 3.30. **CIMIS** – Croatian Integrated Maritime Information System.
- 3.31. **Authorized Waste Management Company** – a legal or natural person within the port authorized by the management of the Marina to enter the port area in order to carry out waste collection activities with the



aim of transporting waste for processing or disposal.

- 3.32. **Port Concessionaire** – a legal entity that has been granted the use of the port area to carry out its activities under the Concession Contract.

4. WASTE MANAGEMENT

- 4.1. In the Marina area, waste disposal shall be conducted in a manner that prevents the following:
- a) risk to human health,
 - b) risk to flora and fauna,
 - c) pollution of water, sea, soil, and air beyond the prescribed limits,
 - d) uncontrolled disposal and incineration,
 - e) explosion or fire,
 - f) occurrence of noise and unpleasant odours,
 - g) occurrence and multiplication of harmful animal and plant organisms, development of pathogenic microorganisms,
 - h) disturbance of public order and peace.
- 4.2. It is strictly forbidden to discharge oily and polluted water, waste oil, and other oily or solid substances into the sea in the Marina area.
- 4.3. The objectives of vessel-generated Waste Management include:
- a) selective waste collection and separation for secondary recovery,
 - b) prevention of irresponsible Waste Management,
 - c) raising awareness of Waste Management.
- 4.4. Waste Management in the area under Marina's authority shall be conducted following this Plan and other applicable regulations of the Republic of Croatia.

The Marina will communicate information regarding Waste Management within its jurisdiction to the public through its official website.

Additionally, the Marina implements and consistently applies procedures and regulations related to environmental protection and Waste Management. Furthermore, it regularly enhances the visual identity of the port by conducting necessary maintenance works and interventions.

5. ASSESSING THE NEED FOR PORT WASTE RECEPTION FACILITIES

- 5.1. The person responsible for Waste Management in the Marina shall provide data on the types and quantities of waste to the designated personnel within the Marina Punat Group. This information shall then be forwarded to the competent ministry through the Environmental Pollution Register (ROO) electronic data processing system. The Marina is obligated to be registered in compliance with the provisions outlined in the Ordinance on Environmental Pollution.
- 5.2. To determine the quantity of waste delivered, the year 2021 serves as the reference year, during which an average of 1,366 vessels on permanent berth utilized the services provided by both the Marina and the dry marina.
- 5.3. Should the quantities of waste change, the Plan will be reassessed and updated.



6. CAPACITY OF PORT WASTE RECEPTION FACILITIES

- 6.1. Waste collection within the Marina area is conducted by specialized companies employing a variety of environmental protection equipment and waste collection vehicles. The Marina is permitted to manage a specific quantity of hazardous and non-hazardous waste within its premises until it is handed over to authorized waste collectors with whom the Company concluded contractual agreements. Waste, including oily water, contaminated paint cans, wood, used tires, oil drums, paper, glass, plastic, ferrous waste, municipal waste, etc., is gathered at designated eco-points up to a specified quantity and subsequently handed over to an authorized disposal company. The Marina extracts fecal water and feces directly from vessels using a portable vacuum pump with a tank. This type of waste is not stored within the port area, nor does the Marina have reception facilities for it. Containers for cardboard and plastic are available at various locations within the Marina area.

The list of specialized companies and contact persons, working hours, and types of waste collected in the Marina area can be found in the Annex to this Plan (Form No. 1).

- 6.2. The current capacities of the existing Waste Reception Facilities adequately fulfill the requirements for waste collection in the Marina area. Should there be a need to expand the reception capacities within the projected three-year period (2022–2025), the Marina will collaborate with existing concessionaires or invest independently to meet these needs.

7. COLLECTION OF VESSEL-GENERATED WASTE

- 7.1. The Marina is obligated to accept both sorted and unsorted vessel-generated waste falling within the scope of the MARPOL Convention and to ensure its sorting, separate collection, storage, and handover in compliance with regulations on Waste Management, as well as other types of waste generated through activities in the Marina.

Once the waste is transferred from the vessel to the Port Waste Reception Facility, the Marina automatically assumes possession of the waste. During these procedures, the waste possessor is obligated to utilize the services offered by persons authorized to conduct Waste Management procedures. When handling waste, specifically during its handover, the possessor is obligated to fill out the accompanying Waste Information Follow-Up Sheet (Form No. 7, attached to this Plan).

- 7.2. The nature of Waste Management in the Marina area is visually represented in the Annex to this Plan, Form No. 3. Waste generated in the Marina (vessel-generated waste, waste from its own activities or those of subcontractors, and waste generated by other Users of the Marina area) can be classified into three groups:

- municipal waste
- non-hazardous technological waste
- hazardous technological waste
- vessel-generated fecal water

- 7.2.1. **Municipal waste** – Municipal waste encompasses waste generated in offices and commercial premises, waste from room maintenance activities, and waste from vessels berthed in the Marina (at sea or ashore) by Marina Users.

Municipal Waste Reception

Marina users, including employees and subcontractors responsible for waste generated through their own activities, as well as other individuals utilizing the Marina area, are kindly requested to appropriately separate municipal waste and dispose of it in designated containers. As per their contractual agreement, a utility company transports municipal waste to the city landfill.

The Port Waste Reception Facilities for the collection of vessel-generated waste are equipped with plastic containers with matching lids for separate waste collection. These containers vary in



volume and color as follows:

- a) glass containers are grey and have a capacity of 140 l;
- b) biodegradable waste containers are brown and have a capacity of 240 l, 360 l and 1100 l;
- c) paper, cardboard, and multilayer cardboard packaging containers are blue and have a capacity of 360 l and 1100 l;
- d) plastic and metal containers are yellow and have a capacity of 360 l and 1100 l;
- e) mixed municipal waste containers are green and have a capacity of 360 l and 1100 l;
- f) semi-underground containers with a capacity of 3000 l and 5000 l have a round shape with colour-coded lids for waste identification; they are additionally marked with a plate in several languages indicating the type of waste.

Sites and capacities of the municipal Waste Reception Facilities in the Marina (12 sites in total):

Zone A – five sites in the southern part of the Marina, as follows:

1. Waste Reception Facility located behind the Market Marina shop comprises:
 - 3 paper, cardboard, and multi-layer cardboard containers with a capacity of 1100 l
 - 1 plastic and metal container with a capacity of 1100 l
 - 1 glass container with a capacity of 140 l
 - 1 biodegradable waste container with a capacity of 360 l
 - 1 mixed municipal waste container with a capacity of 1100 l
2. Waste Reception Facility located by the sanitary facility and the Bistro “9 bofora” comprises:
 - 2 mixed municipal waste containers with a capacity of 1100 l
 - 2 plastic and metal containers with a capacity of 360 l
 - 1 paper, cardboard, and multi-layer cardboard container with a capacity of 1100 l
 - 2 biodegradable waste containers with a capacity of 360 l
 - 5 glass containers with a capacity of 140 l
3. Waste Reception Facility located behind the Bistro “9 bofora” (by the entrance to the underpass) comprises:
 - 2 mixed municipal waste containers with a capacity of 1100 l
 - 2 paper, cardboard, and multi-layer cardboard containers with a capacity of 1100 l
 - 1 plastic and metal container with a capacity of 1100 l, 1 plastic and metal container with a capacity of 360 l, and 1 plastic and metal container with a capacity of 120 l
 - 5 glass containers with a capacity of 140 l
 - 1 biodegradable waste container with a capacity of 360 l and 1 biodegradable waste container with a capacity of 1100 l
4. Waste Reception Facility located on the way to the Yacht Service reception desk comprises:
 - 1 mixed municipal waste container with a capacity of 360 l
 - 2 plastic and metal containers with a capacity of 360 l
 - 1 paper, cardboard, and multi-layer cardboard container with a capacity of 360 l
 - 1 biodegradable waste container with a capacity of 360 l
 - 2 glass containers with a capacity of 140 l
5. Waste Reception Facility located **in front of the Yacht Service building** comprises:
 - 1 mixed municipal waste container with a capacity of 360 l



- 1 plastic and metal container with a capacity of 1100 l, 1 plastic and metal container with a capacity of 360 l
- 2 paper, cardboard, and multi-layer cardboard containers with a capacity of 1100 l
- 1 biodegradable waste container with a capacity of 360 l
- 2 glass containers with a capacity of 140 l

Zones B and C – five sites in the northern part of the Marina, as follows:

6. Waste Reception Facility located on the plateau in the charter zone comprises the following semi-underground containers:
 - 1 mixed municipal waste container with a capacity of 5000 l
 - 2 plastic and metal containers with a capacity of 5000 l
 - 1 paper, cardboard, and multi-layer cardboard container with a capacity of 5000 l
 - 1 biodegradable waste container with a capacity of 3000 l
 - 1 glass container with a capacity of 3000 l
7. Waste Reception Facility located between the dry docks D1–D2 by the fence comprises:
 - 3 mixed municipal waste containers with a capacity of 1100 l
 - 2 plastic and metal containers with a capacity of 1100 l
 - 2 paper, cardboard, and multi-layered cardboard containers with a capacity of 1100 l
 - 1 biodegradable waste container with a capacity of 240 l
 - 3 glass containers with a capacity of 140 l
8. Waste Reception Facility located between D1–D3 by the fence comprises:
 - 1 mixed municipal waste container with a capacity of 1100 l
 - 1 plastic and metal container with a capacity of 1100 l
 - 1 paper, cardboard, and multi-layered cardboard container with a capacity of 1100 l
 - 1 biodegradable waste container with a capacity of 240 l
 - 2 glass containers with a capacity of 140 l
9. Waste Reception Facility located by (behind), and within the Marina restaurant facility comprises:
 - 1 mixed municipal waste container with a capacity of 1100 l
 - 1 plastic and metal container with a capacity of 360 l
 - 1 paper, cardboard, and multi-layered cardboard container with a capacity of 1100 l
 - 1 bio-degradable waste container with a capacity of 360 l
 - 1 glass container with a capacity of 140 l
10. Waste Reception Facility by the fence near the road crossing leading to the dry marina comprises semi-underground (underground) waste receptacles :
 - 1 mixed municipal waste container with a capacity of 5000 l
 - 2 plastic and metal containers with a capacity of 5000 l
 - 1 paper, cardboard, and multi-layered cardboard container with a capacity of 3000 l
 - 1 biodegradable waste container with a capacity of 3000 l
 - 1 glass container with a capacity of 3000 l

Dry marina zone – two sites, as follows:

11. Waste Reception Facility located by the entrance to the dry marina comprises:



- 2 mixed municipal waste containers with a capacity of 1100 l
- 2 plastic and metal containers with a capacity of 1100 l and 360 l
- 2 glass containers with a capacity of 140 l
- 1 paper, cardboard, and multi-layered cardboard container with a capacity of 360 l
- 2 biodegradable waste containers with a capacity of 240 l

12. Waste Reception Facility located by the hall in the dry marina comprises:

- 2 mixed municipal waste containers with a capacity of 1100 l
- 3 plastic and metal containers with a capacity of 360 l
- 1 biodegradable waste container with a capacity of 1100 l
- 3 paper, cardboard, and multi-layered cardboard containers with a capacity of 1100 l
- 2 glass containers with a capacity of 140 l

The combined capacity of all municipal waste containers in the Marina is 71.56 cubic meters. The disposal and quantities of municipal waste in the Marina are not tracked, as the service provided by the Waste Collector operates under a flat-rate contract aligned with the applicable Price List for berths (marinas and ports), determined by the Marina's capacity rather than the volume of waste generated. Only the Waste Collector (Ponikve Eko otok Krk d.o.o. – Ponikve usluga d.o.o.) has access to information regarding the quantities of municipal waste generated in the Marina.

7.2.2. **Non-hazardous technological waste** – Non-hazardous technological waste encompasses waste generated within the Marina, such as cooking oil and the contents of grease separators installed in **our food service establishments (restaurants)**. Other types of waste may occur occasionally, such as certain metal, wood, and similar waste resulting from maintenance activities on buildings or installations in the Marina or major construction projects (e.g. remodeling)).

Non-hazardous technological waste is typically generated intermittently rather than regularly. Waste cooking oil is disposed of in its original packaging, as received by the catering establishment, and is handed over to the cooking oil supplier. The contents of kitchen grease separators, containing only cooking oils and fats, are disposed of by an authorized Waste Management company immediately after cleaning. In other words, this type of waste is neither stored nor disposed of within the Marina.

Non-hazardous technological waste is disposed of by handing it over to an authorized Waste Management company along with the prescribed form titled WASTE INFORMATION FOLLOW-UP SHEET attached to this Plan, Form No. 7.

Types of non-hazardous technological waste that may be generated in the Marina area bear the following EWC codes:

	CODE	DESCRIPTION
1	17 04 05	iron and steel
2	19 08 09	grease and oil mixture from oil/water separation containing only edible oil and fats
3	20 01 25	edible oil and fat

7.2.3. **Hazardous technological waste**

Hazardous technological waste is generated within the Marina area through various sources:

- activities conducted by subcontractors within the Marina area. Alternatively, it may also include hazardous vessel-generated waste disposed of during the contracted berth period,



such as used engine oil, oil-containing waste, non-specified oily waste, oil filters, packaging containing residues of or contaminated with hazardous substances, batteries, IT equipment, etc.

- wastewater treatment plants and equipment – oil separators, kitchen grease separators, i.e. equipment and plants for wastewater purification, namely: sludge from paints and varnishes, sludge from wastewater processing, etc.

Reception of hazardous technological waste at reception sites

Marina Users, including employees and subcontractors, as well as other individuals utilizing the Marina area who generate waste, are instructed to temporarily dispose of hazardous technological waste in the designated waste containers located in the mobile eco-storage facilities. Furthermore, plastic containers have been provided specifically for the disposal of used automotive batteries.

Mobile eco-storage facilities designed for the reception of hazardous waste are constructed from steel sheet metal and include a bund wall with an outlet to manage potential liquid spills effectively. They feature a galvanized floor grid covering the entire surface. The entire structure is enclosed and engineered to facilitate forklift or crane manipulation using its grab slots. The container for used automotive batteries is a gray plastic box measuring 1x1m or 2x0.8m, covered with a matching lid. The box features a label indicating the name and code number of the hazardous waste type.

In the Marina, three mobile eco-storage facilities are available for the disposal of hazardous waste, including containers for used automotive batteries. They are located in the charter area, namely by the sanitary facilities and the Bistro "9 bofora".

The generation of hazardous waste is by no means consistent; it varies seasonally and depends on the volume of work and the number of users present in the Marina. Users dispose of hazardous waste at one of the three available mobile eco-storage facilities as follows:

- engine oil is temporarily stored in covered tanks with a bund wall at three locations in the Marina,
- oil-containing waste and oily water from separators are temporarily stored in 200-liter drums,
- oily waste that is not otherwise specified is temporarily stored in 200-liter drums,
- packaging containing or contaminated with residues of hazardous substances and oily PVC packaging are temporarily stored in PVC bags,
- oil filters are disposed of and temporarily stored in 200-liter metal drums,
- packaging containing or contaminated with residues of hazardous substances and buckets with paint residues are disposed of and temporarily stored in separately labelled drums,
- batteries are disposed of and temporarily stored in a separate container located by the eco-storage facility,
- old electrical and electronic devices are disposed of and temporarily stored in a separate room,
- paint and varnish sludge are disposed of and temporarily stored in metal drums,
- sludge resulting from wastewater processing is disposed of and temporarily stored in metal drums and bags.

Once a sufficient quantity has been collected, the Marina will hand over said hazardous waste to an authorized Waste Management company for treatment. The Marina will also submit the completed "WASTE INFORMATION FOLLOW-UP SHEET" for each shipment of hazardous waste (attached to this Plan, Form No. 7).

Types of hazardous waste that may be generated in the Marina area bear the following EWC codes:

	CODE	DESCRIPTION
1	06 05 02*	sludges from on-site effluent treatment containing hazardous substances



2	08 01 13*	sludges from paint or varnish containing organic solvents or other hazardous substances
3	13 02 08*	other engine, gear, and lubricating oils
4	13 05 02*	sludges from oil/water separators
5	13 05 07*	oily water from oil/water separators
6	15 01 10*	packaging containing residues of or contaminated by hazardous substances
7	15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
8	16 01 07*	oil filters
9	16 06 01*	lead batteries
10	16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
11	20 01 21*	fluorescent tubes and other mercury-containing waste
12	20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)

Special mandatory records are kept for **non-hazardous technological waste and hazardous waste**:

- Form RECORD OF WASTE GENERATION AND FLOW – ONTO, attached to this Plan, Form No. 4,
- Form RECORD OF WASTE OIL GENERATION AND FLOW – ONTOU, attached to this plan, Form No. 5,
- Form RECORD OF WASTE BATTERY AND AUTOMOTIVE BATTERY GENERATION AND FLOW – ONTOBA, attached to this plan, Form No. 6.

7.2.4. Vessel-Generated Fecal Water

The disposal of fecal water is carried out using a portable vacuum pump with a 500-liter tank. Pumping is done through a connection to the existing sanitary facility in the port.

The captain is required to notify the Marina of their intention to utilize the fecal water disposal service. Following confirmation of the service date by the Marina, they are required to navigate the vessel to the designated "Pump Out Area".

The registration and processing of orders are conducted electronically through the Marina's business application. Upon request, the captain may obtain a copy of this record.

Sites of Port Waste Reception Facilities are marked on the map of the Marina. They are indicated on information boards by zones as well. Additionally, these sites are accessible on the Marina's official website and detailed in its informative publications accompanying this Plan, specifically in Form No. 2.

8. NOTICE OF VESSEL-GENERATED WASTE DELIVERY

- 8.1. Ships with a gross tonnage of 300 or less, warships, public ships, fishing boats, traditional ships, yachts under 45 meters LOA, and small boats are exempt from the obligation to provide prior notice of waste



delivery.

- 8.2. Ships with a carrying capacity of less than 300 gross tons or yachts with a length of up to 45 meters, owned either by a foreigner or by a legal entity or a natural person from the Republic of Croatia, may deliver waste to the Port Waste Reception Facility following this Plan without prior notice. The responsible authority overseeing port management is obligated to make information about the types of waste typically received by the Marina, the presence of adequate waste reception facilities, and the associated cost structure publicly available. Users can access this information via the Marina's official website in both Croatian and English.
- 8.3. In exceptional cases, the captain or an authorized representative may notify the Marina at least 24 hours in advance and request the pump-out of fecal water using the portable vacuum pump ("pump-out device").

9. POOR SERVICE COMPLAINTS

- 9.1. Upon receipt of a complaint regarding defects in the Port Waste Reception Facilities, the person responsible for the implementation of this Plan shall take the necessary corrective measures to rectify the shortcomings and ensure user satisfaction.
- 9.2. Defects in the Port Waste Reception Facilities may also be reported to the competent port authority specifying the cause of the problem.

Form No. 8

10. DATA COLLECTION AND REPORTING REQUIREMENTS

- 10.1. The Marina, i.e. the person responsible for Waste Management in the Marina, is obligated to record data on the types and quantities of stored waste and waste handed over to authorized Waste Management providers. This information is recorded using accompanying sheets and the ONTO record (Record of Waste Generation and Flow), as well as on other measures outlined in accordance with the applicable legal regulations of the Republic of Croatia, following the procedure described in Item 6 of this Plan.

11. COST RECOVERY SYSTEM

- 11.1. The cost recovery system for the collection, storage, transport, and disposal of waste is established through an indirect payment method, as specified in the Price List, contracts, Terms and Conditions, and/or Service Proposal.
- 11.2. Berth fees are calculated based on vessel properties, including its LOA, maximum width, position, and the berthing period specified in the Berth Contract. The indirect fee for waste reception, regardless of actual waste delivery from boats and yachts, is included in the fee charged by the Marina under the Permanent or Transit Berth Contract. This fee constitutes a flat rate of 1% of the Berth Price following the Ordinance on the Conditions and Methods for Maintaining Order in Ports and on Other Parts of Internal Waters and Territorial Sea of the Republic of Croatia.

12. WRITTEN GUIDELINES

- 12.1. The Marina has prepared comprehensive written guidelines for its personnel with regard to waste collection procedures, waste flow, waste disposal, and reporting procedures.



13. USER COMPLAINTS

- 13.1. Users may lodge complaints regarding any shortcomings with regard to the Port Waste Reception Facilities.
- 13.2. Upon receiving a complaint about said shortcomings, the person responsible for implementing this Plan shall take all necessary steps to address the issue promptly and ensure user satisfaction. The Marina follows documented procedures for complaint management under the ISO 9001 quality system. Complaints that Marina personnel can resolve within 5 days are classified as minor non-conformities and are recorded accordingly. However, complaints that cannot be resolved by the Marina personnel are considered serious non-conformities and are referred to the competent Marina authority.
- 13.3. Reports of inadequacies with regard to the Port Waste Reception Facilities for vessel-generated waste may also be submitted to the competent port authority, detailing the cause of the problem.

14. PLAN IMPLEMENTATION COORDINATOR

- 14.1. The person responsible for the implementation of this Plan is:

Company CEO: Bernarda Renata Marević
Telephone: +385 51 654 111
E-mail: marina-punat@marina-punat.hr

15. FINAL PROVISIONS

- 15.1. Expert supervision of the implementation of the provisions outlined in this Plan, the protection of the sea from vessel-source pollution, the regulations adopted in the field of navigation safety, and the protection of the marine environment based on this Plan shall be carried out by navigation safety inspectors from the Ministry of the Sea, Transport, and Infrastructure as well as by the Port Authority of Rijeka.
- 15.2. This Plan shall be approved by the Port Authority of Rijeka for a maximum duration of three years.
- 15.3. This Plan shall enter into force on the eighth day following its approval by the Port Authority of Rijeka.

This Plan has been approved by the Republic of Croatia, Ministry of Maritime Affairs, Transport and Infrastructure, Navigation Safety Administration, Port of Rijeka Authority, **Maritime Safety Service** by Order, Class: UP/I-342-21/26-01/36, Reg. No: 530-04-5-1-26-2, on the 25th of August 2026. The Approval forms an integral part of this Plan.

I hereby confirm that this Plan entered into force and was published on Marina's website on the 25th of August 2026.

Bernarda Renata Marević
Marina Punat d.o.o. manager

RECORDS

- List of Authorized Waste Reception and Waste Management Companies in the Marina Area – Form No. 1
- Map of the Marina featuring sites of Port Waste Reception Facilities – Form No. 2



- Diagram titled "Waste Management in the Marina area" – Form No. 3
- Form Record of Waste Generation and Flow – ONTO, attached to this Plan, Form No. 4,
- Form Record of Waste Oil Generation and Flow – ONTOU, attached to this plan, Form No. 5,
- Form Record of Waste Battery and Automotive Battery Generation and Flow – ONTOBA, attached to this plan, Form No. 6.
- Waste Information Follow-Up Sheet – Form No. 7
- Defects in the Port Waste Reception Facilities – Form No. 8
- Environmental Pollution Register (ROO) Electronic Data Processing System Form

ARCHIVING: Maintenance service

Map of the Marina featuring sites of Port Waste Reception Facilities