



Ferrer

Disclosure Report
Date Submitted: January 23rd, 2025



Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Energy Intensive Industries
Summary of Issue	<p>As a company in the chemical and pharmaceutical product manufacturing industry, Ferrer operates in an industry that is recognized as an energy-intensive industry due to its manufacturing processes. The scope of the company's operation include:</p> <ul style="list-style-type: none">- 2 Pharmaceutical Production Centers in Spain- 1 Chemical plant in Spain- 1 Logistics Center in Spain- 1 Warehouse in Spain- 1 R&D Center in USA- 8 Offices (Spain, Portugal, Germany, México, Perú, Chile, Costa Rica, Austria) <p>The energy intensive parts of the company's operation are the steam boilers in their production plants as well as mobility. The main GHG contributor is natural gas combustion.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>In the previous fiscal year, 100%% of Ferrer revenue was earned from the sale of pharmaceutical products and 49,14% of Ferrer's revenue came from products manufactured in Ferrer's facilities during 2023.</p> <p>Ferrer's manufacturing facilities have an energy intensity of 0,00057 GJ/ per euro (€) of revenue from products produced.</p> <p>Greenhouse gas emissions represented a total of 72,902 tCo2eq in FY2023, representing an emissions ratio of 0.013 tCO2eq/thousands of euros. Their emissions are divided in the following emission scopes:</p> <p>Scope 1: 10% Scope 2: 0 Scope 3. 90%</p> <p>The renewable energy consumed by Ferrer in 2023 represents 48% of the total energy used, amounting to a total of 32.675 MWh. 100% of Ferrer's electricity consumption comes from renewable sources.</p>
Impact on Stakeholders	Energy intensive activities, such as chemical and

	<p>pharmaceutical manufacturing, pose an environmental risk due to the related emissions derived from energy use. The extent of environmental impact is dependent on the energy sources utilised and the management practices in place to manage energy use.</p> <p>Ferrer uses electricity, natural gas and diesel. Electricity is the largest energy source, and 100% is derived from renewable sources. The company's main GHG contributor is natural gas, which is used in their operations to produce steam for all production processes. In 2023, natural gas contributed to 7% of Ferrer's global carbon footprint.</p>
<p>Implemented Management Practices</p>	<p>Ferrer's environmental strategy includes, within the Climate Action pillar, a section focused on energy. In order to control energy resources and reduce consumption, energy audits are carried out periodically by independent, specialized and certified companies. The objective of these audits is to evaluate the current state of the energy management of the centers and to propose measures for continuous improvement to optimize resources.</p> <p>Ferrer's objective is to seek continuous improvement, and therefore an annual budget item is set aside to implement some of these measures. There are steam, natural gas and electricity meters. The company also has an ISO14001-certified environmental management system that covers energy issues, and there are also specifically assigned people in the operating plants to manage energy issues.</p> <p>Ferrer has implemented the following practices to manage their energy and emissions in their production plants:</p> <ul style="list-style-type: none"> - Commissioned new industrial steam generation boilers that will help reduce the total consumption of industrial steam; -LEED certification for 100% of their production centres of more than 1,000 m2; - Energy efficiency program in place that includes monitoring and optimization of all consumption; - Energy setting mode when there is no production; - Refrigeration equipment in cold room updated by introducing models that work with CO2 (GWP of 0) instead of traditional refrigerants with a high GWP. -Energy efficiency program in line with their commitment to reduce energy consumption by 10% by 2025 in their Chemical

	<p>and Pharmaceutical plants.</p> <ul style="list-style-type: none"> - 100% electricity derived from renewable sources. <p>To achieve commitment to sustainable transport, Ferrer has implemented the following practices:</p> <ul style="list-style-type: none"> - Set target to achieve a 100% electric fleet by 2030, a 20% reduction in the carbon footprint associated with logistics and a 5% reduction in the carbon footprint of business travel. -21% of the company's fleet are electric vehicles, and 75 charging points have been installed. -Electric fleet certified as sustainable through the Spanish Association Fleet and Mobility Managers (AEGFA, see link below) -100% of the people with company vehicles in the central office in Spain and 87% of the area managers have electric vehicles. <p>As part of Ferrer's zero emissions commitment the company has set targets to reduce direct greenhouse gas emissions by 50% and indirect GHG emissions by 25% by 2030 and to achieve carbon neutrality in their direct emissions in the same year. In addition the company aims to achieve a positive carbon balance in their direct emissions by 2030 and in their overall emissions by 2050. The company has publicly communicated their decarbonization targets through the Science Based Targets Initiative (SBTi, see link below) with a commitment to reducing direct emissions by 50% and indirect emissions (which account for 90% of overall emissions) by 25% by 2030.</p> <p>Ferrer is part of different forums and associations where benchmarks are made with other companies in the same sector (chemical and pharmaceutical) in different indicators such as safety, consumption of natural resources (eg water, natural gas, electricity), policies or relationship with stakeholders. Ferrer is member of:</p> <ul style="list-style-type: none"> - The Catalan Chemical Industry Federation (FedeQuim, see link below) - Business Federation of Spanish Chemical (FeiQue, Federación Empresarial de Química Española, see link below) - Spanish Association of Fine Chemical Producers (Asociación Española de Fabricantes de Productos de Química Fina, AFAQUIM, see link below); - Association of Security and Environment in the Chemical Related industry (COASHIQ, see link below);
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	<ul style="list-style-type: none"> - Farmaindustria (Farmaindustry Association, see link below); - International Society for Pharmaceutical Engineering (Ispe, see link below). <p>In addition, the exercise and the transparency of the companies reporting CDP Climate results allows the company to compare its energy performance with other companies in the sector.</p> <p>Further information is available in the company's Sustainability Report (See link below).</p>
Report	Ferrer Sustainability Report AEGFA Science Based Targets Initiative (SBTi) Ferrer website Liveable Planet pilar FedeQuim AFAQUIM

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Water Intensive Industries
Summary of Issue	As a company in the Chemical/ Pharmaceutical industry, Ferrer operates in an industry that is recognized as a water-intensive industry due to its manufacturing processes. The most water intensive part of Ferrer's operations is Active Pharmaceutical Ingredients (API) Manufacturing in its chemical plant.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>In the previous fiscal year, 100% of Ferrer revenue was earned from chemical products (pharmaceutical products). 49.14% of Ferrer's FY2023 revenue came from the sale of products manufactured in Ferrer's facilities.</p> <p>Ferrer's manufacturing facilities have a water intensity of 0,0005 cubic meters (m³) per euro (€) of revenue from products produced.</p>
Impact on Stakeholders	<p>As a water intensive industry, the manufacturing of pharmaceutical products poses risks such as water stress or depletion of local water sources if water used is not appropriately managed.</p> <p>The company uses the municipal water source for its manufacturing processes.</p> <p>The main stakeholders affected are other water users in the regions of operation, such as local water authorities & regulators, residents, other industrial plants, farmers, and the local biodiversity.</p> <p>Ferrer's operations are located in Catalonia. According to the Water Risk Atlas, Catalonia includes areas with high water stress, mainly due to low water availability caused by droughts and high population density. Aware of the situation in the area where Ferrer operates, water has been included as a block within the Natural Capital pillar of the environmental strategy and a water management plan is periodically submitted to the competent administrations.</p>
Implemented Management Practices	Ferrer's environmental strategy includes, within the Natural Capital pillar, a section focused on water management. Ferrer drafted and implemented a Sustainable Water Cycle Management Plan for their chemical and pharmaceutical plants.

	<p>This plan proposed a series of measures to reduce the water footprint of the production centers with the aim of reducing water consumption by 5% in 2025 and a global target to reduce water consumption by 10% in 2030. Since the implementation of the Management Plan in 2019, water consumption has been reduced by 20.55 % compared to that year. The company also has an ISO14001-certified environmental management system that covers water management issues, and there are also key figures in the operating plants to manage these issues.</p>
	<p>Multiple actions have been carried out to reduce water consumption, such as:</p> <ul style="list-style-type: none"> - The installation of meters with daily automated reading that allow the sectorization of all areas/services of the production centers; - Water efficiency studies in main production plants; - The automation and optimization of the cooling systems by means of an industrial steam condensate pump; - of the refrigeration and condensate systems or the reuse of osmosis rejection water; - Collection and reuse of part of the wastewater from the company's production systems for other uses; - Reuse of rainwater to irrigate landscaped areas and green roofs; - Implementation of a water saving project called "Aquavida" in the area of solid pharmaceutical product manufacturing, extending period between cleaning - Installation of new greywater treatment system in the company's logistics center- to reuse water from sinks, washbasins and showers; - Installation of a dry pump for reducing water consumption in the Chemical Production plants; - Programming of alarm system that warns of excessive water consumption in equipment.
	<p>The company is part of different forums and associations where benchmarks are made with other companies in the same sector (chemical and pharmaceutical) in different indicators such as safety, consumption of natural resources (water, natural gas, electricity), policies or relationship with stakeholders. The forums and associations that Ferrer is part of are outlined in the Energy Intensive Disclosure. In addition, the exercise and the transparency of the companies reporting CDP Water results allow the company to compare its water performance with other companies in the sector.</p>
	<p>Further information on the company's actions and targets related to sustainable water management is available in the</p>



	company's Sustainability Report (see link below).
Report	Ferrer Sustainability Report Ferrer website Liveable Planet pillar

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Industries reliant on chemicals

Topic	Ferrer manufactures and sells pharmaceutical products based on chemical inputs
Summary of Issue	As a company that manufactures and sells pharmaceutical products, Ferrer operates in an industry where chemical inputs are a material issue. Ferrer's products are based on chemical inputs, but Ferrer doesn't utilize any Substances of Very High Concern (SVHCs) as listed by REACH norm regulated by the European Chemicals Agency (ECHA).
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	100% of Ferrer's products contain chemical inputs.
Impact on Stakeholders	The primary potential impacts of chemical use in pharmaceutical products are potential negative effects to the environment and potential negative health impacts to workers exposed to chemical ingredients. In the last five years, Ferrer has not experienced any incidents and/or fines related to environmental or worker impacts of its chemical use.
Implemented Management Practices	<p>Ferrer has a product safety unit that is responsible for detecting, evaluating, and improving the management of hazards for all chemical products during all aspects of the lifecycle (transportation, manufacturing, and disposal).</p> <ul style="list-style-type: none"> - The level of hazard is analysed in terms of human exposure, physical danger (e.g. risk of explosion) and environmental negative effects through an integrated management system (common for all the factories). - Identified risks are mitigated by improving protocols, adapting facilities or designing protective gear for factory workers, among others. <p>All the products have been tested and approved as safe and effective by the Spanish Agency of Medicines and Health Products.</p> <ul style="list-style-type: none"> - All the products include an information leaflet that, amongst other things, informs about the possible adverse reactions and the probability of occurrence. - There is a pharmacovigilance unit that is responsible for detecting, evaluating and improving adverse reaction to drugs.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Animal Testing

Topic	Animal testing required by law
Summary of Issue	As required by law, 100% of Ferrer's drug products are experimented with animals described in the ICH M3(R2) guideline. The regulations of the different regulatory pharmaceutical agencies explicitly and in detail require the carrying out of studies in experimental animals. Additionally, some chemical substances manufactured by Ferrer also need to be tested on animals according to the law when no alternative or no bibliographic data is available.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Approximately 100% of Ferrer's drug products revenue and 50% of its chemical products revenue are derived from products tested with animals.
Impact on Stakeholders	Animal testing is a material issue in the pharmaceutical industry due to the potential for adverse health reactions caused to animals involved in the process.
Implemented Management Practices	<p>Ferrer does not carry out animal studies at its facilities. Animal studies included in the research and development programs are outsourced third-party suppliers and vendors. Ferrer sponsors animal studies if there is a specific legal or regulatory requirement to do so, in order to make a health benefit claim.</p> <p>Ferrer partners with public universities, public hospital research institutes, and contract research companies (CRO). All the centers that Ferrer hires comply with the European directives (Directive 2010/63 / EU as amended by Regulation (EU) 2019/1010) as well as the regulations of the Member States and the regions on the subject, including mechanisms for approving protocols and Ethical Committees for Animal Welfare.</p> <p>Ferrer uses criteria 3Rs. The 3Rs initiative (Replacement, Refinement, Reduction) seeks to reduce the use of experimental animals (www.understandinganimalresearch.org.uk/animals/three-rs/) by applying replacement criteria for in vitro experiments or for inferior species (eg using invertebrates instead of vertebrates), optimization of protocols to increase animal welfare and reduction of number of animals used. Additionally, the Ferrer Commitment with Animal Welfare has been included as part of</p>

	the R&D Responsible Policy. In parallel, Ferrer has established an internal procedure describing the management process of non-clinical health and environmental safety studies to ensure the animal welfare and the Good Laboratory Practice (GLP) compliance (C2600-D-RD-001).
Report	For more information on the 3Rs initiative, visit: www.understandinganimalresearch.org.uk/animals/three-rs/



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation and Arbitration

Issue Date	2019, 2021 and 2022
Topic	Litigation and Arbitration related to Contract Disputes
Summary of Issue	In the last 5 years, the company has had 3 cases related to contract disputes. One of these cases were settled out of court and two cases are still pending resolution.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The total amount claimed in these cases represents less than 1% of the company's annual revenue.
Impact on Stakeholders	Contract dispute litigations can arise from various situations where parties involved in a business relationship disagree over the terms, performance, or interpretation of a contract. Among the most common negative impacts of this type of case are reputational and financial harm for the parties involved.
Resolution	Two cases are pending resolution and one case was settled out of court with payments.
Implemented Management Practices	Ferrer shared that it ensures that all the contracted services are based on a formal contract which includes detailed payments, standard of service to be delivered, termination clauses and the cases in which they apply. The company is also updating partnerships to maintain business standards across the globe.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Penalties

Issue Date	June/2024
Topic	Investigation into alleged unfair price fixing of the product Remodulin in Colombia between 2018 and 2022
Summary of Issue	<p>On June 25, 2024, Colombia's Superintendency of Industry and Commerce (SIC) notified FERRER INTERNACIONAL, S.A., FERRER COLOMBIA, S.A., and Ferrer's local distributor of the initiation of an investigation into alleged unfair price fixing of a product sold in Colombia between 2018 and 2022.</p> <p>Ferrer has a local distributor for the Colombian market. FERRER INTERNACIONAL, S.A. holds the product's registration in Colombia but does not participate in its marketing strategy or price setting, which are the sole responsibilities of the local distributor.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In July 2022 there was a new legislation (Circular 13) where the price of a product in Colombia was internationally referenced and was adjusted according to the new legislation. The price referred to in the ongoing investigation was reduced by approximately 50%.
Impact on Stakeholders	Pricing decisions directly affect the affordability and accessibility of products globally. There is ongoing debate among stakeholders in the pharmaceutical industry over the pricing of pharmaceutical products, heavily due to lack of transparency around the pricing methodology and R&D practices of pharmaceutical companies. Transparency is essential in order to address accessibility issues in the industry. In addition, to further address accessibility issues, companies can adopt "equitable pricing strategies" by taking into account the ability of individuals and healthcare systems to pay at a local level.
Resolution	The investigation is still ongoing. The company reiterates that Ferrer is not directly involved in the commercialization and price setting that are currently under investigation.
Implemented Management Practices	The Ferrer Pricing Model for Excellence (F PRIME) is the governance model developed to respond to pricing needs and ensure Ferrer's pricing policy is correctly implemented, as well as complying with the company's value and strategy. F PRIME ensures that all stakeholders are accountable for their work and

More information on the company's pricing policy is available on the company's public [B Corp profile](#).



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Disclosure Nuclear Power or Hazardous Materials

Issue Date	January 2024
Topic	Total Organic Carbon (TOC) leak in one of the company's facilities.
Summary of Issue	<p>Ferrer is a pharmaceutical company headquartered in Spain. In January 2024 one of the company's facilities experienced a Total Organic Carbon (TOC) emissions discharge. TOC is an analytical parameter quantifying the total organic carbon concentration released into the atmosphere. The incident happened as the Regenerative Thermal Oxidizer (RTO) broke down and stopped treating correctly the gases that were directed to it, being detected by the Automatic Measurement System (AMS). Alternative measures, including scrubbers and condensation, were used when the RTO was not operational.</p> <p>The emissions exceeded the 20 mg/Nm³, but the Emissions Value Limit (VLE) exceedance was within the legal framework of the regional legislation of Catalonia where the company operates. According to this legislation, emissions can be emitted above the VLE during specific and continuous hours during the year, the maximum allowable anomalous operation for pharmaceutical activity is 120 hours per year and/or 24 consecutive hours, neither of these limits have been exceeded by the company.</p> <p>The incident happened once in the last 5 years.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>There are currently a total of 40 emitting sources in the chemical plant. The incident occurred in one of these sources, in the regenerative thermal oxidizer (RTO).</p> <p>The surface area of the RTO is 3 m², while the total built surface area of the chemical plant is 3877 m², so the percentage affected is less than 0.07%.</p> <p>No penalties or fines were paid.</p>

Impact on Stakeholders	These emissions could impact air quality.
Management Practices	As a corrective action to mitigate harm caused by this discharge, or to prevent similar occurrences in the future, the company implemented alternative measures, such as the use of scrubbers or condensation to take the emissions to other gas treatment facilities, until the Regenerative Thermal Oxidizer (RTO) was repaired.