

CIRCULAR LETTER

RE: Renewal of the Integrated Environmental Authorization - A.I.A. - Decision DDAA2-74-2009 of 27/3/2009 Prot. Gen. N.20090043169 and subsequent amendments - issued to Nuova Solmine SpA of Serravalle Scrivia by the Province of Alessandria

Dear Customer,

Hereby and with reference to the Integrated Environmental Authorization - A.I.A. - quoted in subject, the deadline of which to be subjected to the procedure review had been postponed to March 27th 2021 due to the regulatory changes to part II of Legislative Decree 152/06 and subsequent amendments, introduced by Legislative Decree 46/2014 - see Decision DDAP1-734-2014 of 22/12/2014 Prot. Gen. N. 20140115097 of the Province of Alessandria - we hereby confirm the following:

- a) With reference to art. 29 of Legislative Decree no. 46/2014, with effect from April 11th 2014, the competent authority will review the AIA in the following cases:
 - within 4 years from the date of publication in the Official Journal of the EU of the decisions relating to the conclusions on BAT referring to the main activity of an installation;
 - 12 years after the AIA has been released *or after the last review carried out on the entire installation* for installations that were respectively certified UNI EN ISO 14001 when the AIA was issued; therefore in case the AIA currently valid for the activities carried out at our Serravalle Scrivia plant by March 29th 2021.
- b) Our Company submitted, within the terms provided by and agreed with the Province of Alessandria, the request to Renewal the current AIA having passed 12 years from the date of issue of the same.
- c) The Province of Alessandria - on 27/11/2020 with letter Prot. Gen. 67112 – started the procedure - for the RENEWAL, according to Presidential Decree 160/10 and art. 29 octies of Legislative Decree 152/06 and subsequent amendments, of the Integrated Environmental Authorization issued with deed no. DDAA2-74 / 43169 of 03/27/09 and subsequent amendments for the plant located in Via Nuova Vignole n. 38 - 15069 SERRAVALLE SCRIVIA (AL) - DELLA NUOVA SOLMINE S.P.A. – (see the attached communication).

- d) In the aforementioned communication, the Province of Alessandria confirms that, according to Legislative Decree 152/06 and subsequent amendments, art. 29 quater and without prejudice to the provisions of paragraph 8), the Renewal procedure should have been complete within 150 days from November 20th 2020 and therefore by APRIL 18th 2021.
- e) The aforementioned paragraph 8 of Legislative Decree 152/06 and subsequent amendments provides that, as part of the Conference of Services, the Competent Authority may request additional documentation indicating the maximum deadline not exceeding ninety days for the presentation of the supplementary documentation. In this case, the deadline for concluding the procedure remains suspended until the supplementary documentation is presented.
- f) On February 4th, 2021, the first Services Conference was held to examine the documentation sent by Nuova Solmine SpA regarding the request for Renewal the current AIA. The competent authority requested the presentation of supplementary documents to the documentation presented.
- g) On October 5th, 2021, the second Services Conference was held to examine the documentation sent by Nuova Solmine SpA and the competent authority requested the presentation of new supplementary documents to the documentation presented.
- h) On June 20th, 2022, Nuova Solmine presented, through the SUAP of Comune di Serravalle Scrivia, the new and supplementary requested documents and we are now waiting that the Provincia di Alessandria organize the new Service Conference mentation presented.

In the meantime, as provided by current legislation, the current AIA authorization remains fully in force and the activities carried out by us continue in accordance with the requirements provided for mentioned current permission (AIA).

We will promptly notify you of the updates on the procedure in progress and, once the new authorization is issued, we will send you the new permission.

We remain at your disposal for any clarification or information you may need,

Best Regards.

Walter Pizzoni
Direttore Generale
Nuova Solmine SPA –Serravalle Scrivia

Serravalle Scrivia, July 28th 2022