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1. Study Objectives

The aim of this study is to provide useful information for the different maritime transport and logistics operators on good practices and challenges to achieve a Sustainable way of developing their transport business.

The study is focused on the main aspects that the company ACCIONA Trasmediterranea considers essential to develop and maintain a strategy on Sustainability. These aspects are the interaction with the different stakeholders of a shipping company, the management systems, the policy on Climate Change and the system developed for monitoring and reporting in Corporate Responsibility.

2. Target Stakeholders

- Ship and logistics operators interested to benchmark their strategies or to develop new systems
- Shippers and freight forwarders wishing to include sustainability performance criteria in their decision making processes
- Policy makers in analyzing policy strategies particularly related to MoS (Motorways of the Sea).

3. Glossary Terms

- **Management Systems:** the framework of processes and procedures used to ensure that the company can fulfill all tasks required to achieve its objectives. ACCIONA Trasmediterranea has developed four management systems according to the main strategic policies, which are: Safety Management System, Quality Management System, Environmental Management System, Safety and Health Management System.

- **MARPOL:** International Convention that covers prevention of pollution of the marine environment by ships from operational or accidental causes. It is a combination of two treaties adopted in 1973 and 1978 respectively and updated by amendments through the years. The Convention currently includes six technical Annexes:
 - Annex I: Regulations for the Prevention of Pollution by Oil
 - Annex II: Regulations for the Control of Pollution by Noxious Liquid Substances in Bulk
 - Annex III: Prevention of Pollution by Harmful Substances Carried by Sea in Packaged Form
 - Annex IV: Prevention of Pollution by Sewage from Ships
 - Annex V: Prevention of Pollution by Garbage from Ships
 - Annex VI: Prevention of Air Pollution from Ships

- **Motorways of the Sea (MoS):** short maritime routes between two points that combined with intermodal transportation, contribute significantly to improving logistics costs. They are the optimal routes between source and destination in terms of viability, profitability, sustainability and delivery times, when compared with shipping by road.

- **Stakeholders:** each of the parties that affect or are affected by the actions of the company as a whole. In this study is analyzed the impact of the business on shareholders, employees, clients, suppliers, local communities and society.

- **Sustainability Report:** bulletin that includes information of the environmental data analysis of the company. This information is based on environmental indicators and on the establishment of the necessary corrective measures when deviations are detected from the optimal values of operating or from the environmental objectives and targets set.

4. Introduction to ACCIONA Trasmediterranea

Compañía Trasmediterránea was founded in January 1917 for the transportation of passengers, vehicles and rolling cargoes by sea. At present it operates primarily in four marine areas of Spain: Mediterranean, South, Canary Islands and North.

It was acquired by the government in 1978 and in September 2002 it was purchased by ACCIONA and other minority shareholders becoming a private Company. Nowadays, ACCIONA Trasmediterranea is integrated into the ACCIONA Logistics and Transport Services division.

Currently the Company operates in 17 state-owned ports with a fleet of 23 ships of its own and many other charters. It also has an onshore infrastructure support with 15 delegations, 6 repair shops and 2 warehouses.

According to ACCIONA's positioning as "Pioneers in Development & Sustainability", Trasmediterranea stands for the values of the three cornerstones of Sustainability: the generation of shareholder value and promotion of sustainable initiatives, the contribution to social wellbeing and solidarity and the protection of the environment on all the aspects of its activity. According to these principles, the Company develops its business by considering the interests of society and by taking responsibility for the impact of its activity on all of its stakeholders: employees, clients, suppliers, government, local communities, shareholders, etc.

5. Management Systems

As a result of its commitment to Sustainability, ACCIONA Trasmediterranea has developed four management systems that contribute to keep its position as the largest operator of maritime transport for passengers and cargo in Spain and one of the largest in Europe.

Safety and Security

ACCIONA Trasmediterranea implemented a Safety Management System in 1995 which was certified by the government ("Dirección General de la Marina Mercante") in accordance with

the International Safety Management (ISM) code in 1996, becoming the first shipping Company in Europe with the aforementioned certification.

Quality

ACCIONA Trasmediterranea has a Quality Management System developed under the standards of ISO 9001:2000. This system was introduced as ISO 9002 in 1996 for the Technical Management and Security of the Fleet and, later, in 1999, the certification was expanded according to the specifications of ISO 9001.

Within the general policy of improving service and involvement of all employees of the Company in such processes, ACCIONA Trasmediterranea was in 2000 awarded the EFQM Excellence Award (Europe's most prestigious award for organizations) being the first European shipping Company to receive the awarded.

Environment

ACCIONA Trasmediterranea implemented an Environmental Management System ISO 14001:2004 that was certified in 2006. The main axes of the EMS are the use of specific procedures and good practices to prevent and minimize the impact on the environment, the compliance with legislation (MARPOL, SOLAS, etc.), a responsible consumption of natural resources and energy, an efficient waste management (reducing the generation of hazardous, MARPOL I and MARPOL V wastes and eliminating the dumping of waste at sea), climate change (according to ACCIONA's commitment to pursue a sustainable transition towards a low carbon economy), reduction of atmospheric and acoustic emissions and the minimization of environmental impact of the ships by using the most advanced technologies. The certificate has recently been renewed (April 2009) until May 2012.

Also with the intention of increasing levels of Sustainability of the business, ACCIONA Trasmediterranea is currently pursuing the following objectives:

- Implementation of an onboard separate waste collection.

- Plan for reducing emission gases that deplete the ozone layer, both onboard and onshore.
- Installation of CLT propellers in certain vessels to reduce fuel consumption.
- Study the possibility of installing evaporators on board vessels with bilge water separators.

To manage risks efficiently, the Company has created the Operations Control Center (CCO), which works 24 x 7 monitoring the proper implementation of all the shipping services of the Company.

The center is permanently connected with all ports, both delegations and agencies, with the fleet and all the departments of the Company: maintenance, security, cargo, passenger services onboard, etc.

Supported by the best information and communication technologies, the CCO controls the exact position of the fleet, and has information of the weather and the forecast passenger load for each of the trips. With all this information, the CCO can assist or take decisions and, where possible, anticipate the impact of changes and deviations more rapidly.

It should be noted that so far the Company has no ongoing litigation relating to the protection and improvement of the environment. To improve cover for contingency, the Company has contracted liability insurance (Bunkers 2001) for each and every one of their vessels in addition to the compulsory certificates needed for their operation.

Occupational safety and health

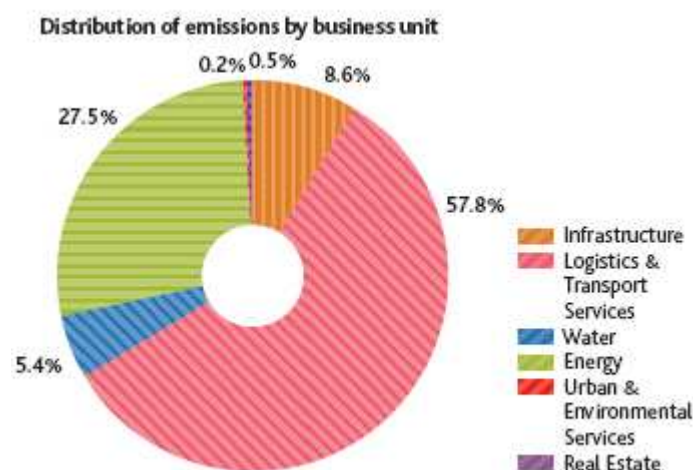
ACCIONA Trasmediterranea has an Occupational Safety and Health Management System developed in 2006 with which the Company intends to continue with the increasing integration of preventive measures in order to assess any risk of existing labor and thus the corresponding corrective action.

6. Key Strategies on Climate Change

Transport is one of the industries where CO₂ emissions have risen most in recent years. In 2005, emissions from the transport sector were 83% higher than in 1990, the baseline year used in calculating reduction goals under the Kyoto Protocol.

Aware of this, ACCIONA Trasmediterranea is committed, from the energy point of view, to using clean and efficient transport modes that encourage the transition to a low-carbon economy. Nowadays ACCIONA Trasmediterranea is working intensely to seek environmentally-sustainable, low-carbon solutions that provide strategic and competitive advantages in the market.

ACCIONA Trasmediterranea represents the 70% of ACCIONA Logistics and Transport Services division's turnover. This division produced the greatest amount of greenhouse gases (GHG) emissions within the Company in 2008: 57.8% of the total.



Nevertheless, the division reduced its CO₂ emissions by 39% compared to the previous year by the implementation of a *Climate Strategy* based on the following actions:

Monitoring and tracking emissions generated and avoided

The information about consumption of fuel and marine gasoil is collected from each ship on a month basis, allowing for a detailed tracking of emissions generated. Key features of the procedure include flexibility, precision, effectiveness and transparency, enabling the Company to measure the emission reductions resulting from improvement actions.

Promotion of the awareness about Climate Change

In 2008 ACCIONA distributed a Manual of Best Practices in Energy Efficiency to all Group employees accompanied by a large internal communications campaign with a view to reminding them about the importance, in their daily activities, of taking steps and adopting new habits to eliminate unnecessary energy consumption. In the forthcoming years, employees will continue to receive information via the intranet, flyers, brochures, etc., and building maintenance supervisors will receive technical instructions for monitoring and implementing all measures.

Energy Efficiency Plan

As part of the 2008-2011 Environmental Efficiency Plan launched by ACCIONA in 2008 this Energy Efficiency Plan aims at reducing the Group's CO₂ emissions. There are two types of actions taken which are explained below:

1. Actions taken onshore:

- Illumination:

Use new low consumption technologies reducing consume more than 80%: compact fluorescent lamps, electronic ballasts, use of presence and natural light detectors, art lighting, LED technology.

- Climate Control:

Automatic adjustment of HVAC equipment at optimum temperatures for comfort, adjust the temperature in areas with less need for air conditioning, not to use air conditioning systems when is not needed and softening the dress of employees in the summer to improve thermal comfort. To support this initiative, a procedure for implementing and tracking this initiative was designed and distributed to all maintenance supervisors at selected office buildings. This technical document focused particularly on instructions for correctly monitoring and tracking results.

- Efficiency and electronic office equipment:

Purchase of efficient computer equipment, use new technologies for telework, training and employee awareness.

- Employee mobility and logistics:

Promoting good practice and sustainable mobility, alternative fuels and fleet renewal.

2. Actions taken on fleet

- Reducing specific fuel consumption:
 - Adoption of the most economical speed (fuel consumption/nautical mile) on scheduled routes.
 - Use of a new system which optimizes engine speed on the basis of weather conditions to reach adequate levels of efficiency (ETAPILOT).
 - Changes in sailing times to respond to travellers' actual needs.
 - Rigorous control of sailing schedules.
 - Improvements in scheduled maintenance.
- Reduction of activity levels:
 - Reducing the number of miles travelled by cutting round trips and improving utilization levels (occupancy).

The implementation of these different actions has meant a saving of 16,635 T of fuel and therefore has avoided the generation of 51,848 T of CO₂. This steady improvement, year after year, is the result of ACCIONA's efforts to fulfill its commitments and reflects the effectiveness of the energy efficiency policies that are in place.

"Motorways of the Sea". Sustainable alternative transportation

In terms of CO₂ emissions, road haulage generates much more pollution than cargo ships. Surveys showed that an intermodal option based on short-sea shipping produced 2.5 times less pollution by CO₂ emissions, than the road option.

For that reason, ACCIONA is working on developing short-sea shipping routes (also known as “MoS”) which, through intermodal transportation, contribute significantly to improving logistics costs. Routes between source and destination are optimised in terms of viability, profitability, Sustainability and delivery times, when compared with shipping by road.

ACCIONA Trasmediterranea currently has two short-sea shipping routes in operation:

- **Vigo-Saint Nazaire:** operational since 2005 to support the transport of vehicles and car parts from Group PSA Peugeot-Citroën in Spain to France’s Atlantic coast. This short-sea shipping route removes an average of 30,000 trucks and 125,000 vehicles from the road each year.
- **Barcelona-Canary Islands:** in operation since June 2006. This route contributes significantly to the decongestion of roads by removing 25,000 trucks and 7,000 vehicles travelling between Barcelona and the Canary Islands, via Cadiz.

In 2008, the two shipping routes avoided 37,802 tones of CO₂ emissions to the atmosphere.

Benefits in ACCIONA s MoS projects

- The reliability of vessels to guarantee a regular service (98% on time in 2007). This commitment enables customers to use the services.
- Unaccompanied transport enables road haulage companies to make the best use of their tractor units and drivers by increasing the number of semi-trailers.
- It is a commitment to sustainable transport by removing traffic from the roads and, therefore, reducing atmospheric pollution.
- The distance between ports is shorter by sea than by road and, consequently, the cost of the sea route is lower.
- Terminals are directly linked by fast access routes and provide services areas, security services and other facilities for drivers.

7. Analysis of Stakeholders

7.1. Employees

To ensure a proper organization, policies, objectives and processes, management of human resources are planned, developed and reviewed annually by the Directorate of Corporate Resources through the Department of Human Resources and Organization.

The level of experience of the employees is, as an average, of 28 years. This indicates that the Company is a good place to work; there is a deeply rooted and a traditional character corporate culture.

To guarantee the continuous training of its employees, ACCIONA Trasmediterranea produces an annual Training Plan, which includes training for both technical and management skills. To complement this plan, an On-Line system was launched in 2007 for training all employees directly on their workplaces. This project was launched with two types of courses, Occupational Safety and Health, which is mandatory for all employees of the Company and two voluntary courses for familiarization with new technologies: Internet and use of e-mail. In 2008 an on-line course on Gender Equality was launched for all managers and supervisors, which will be mandatory for all the employees of the Company in the future.

In addition to this training plan, the Company uses a performance evaluation process for the employees of the Company and there are currently several ongoing projects to be launched in 2010.

ACCIONA Trasmediterranea gathers information from its employees in a systematic way through the meetings organized by the commitment as well as by the scheduled "Surveys on working environment", which report on strengths and improvement opportunities identified and facilitate the implementation of action plans. These surveys provide information to check or review the Company's strategy.

Social Benefits

There is a set of means to promote social and cultural activities between the employees of the Company, among which are:

- Free tickets for ships of the Company
- Discount in onboard stores.
- Transportation service from Madrid to the headquarters of ACCIONA
- Camps for children of employees.
- Special loans.
- Sports Competitions.
- Policy Group life insurance:
 - Marriage
 - Birth of a child of employee
 - Death of parents, children and spouse of the employee
 - Death of employee
- Assist in the geographical mobility.
- Early retirement.
- Bonus for retirement at 65 years.
- Additional vacation days.

7.2. Clients

The Company has the business segmented into two main blocks that represent the vital processes involved in the activity: cargo and passengers. Both have similar billing rates and same importance level when developing policies and objectives.

To ensure a predictable and efficient fulfillment of its commitments to clients and all terms of contracts, the CEO of ACCIONA Trasmediterranea develops an annual Fleet Plan that considers an integral fulfillment of all services and seasons, stranded, maintenance, etc.

The brand of ACCIONA Trasmediterranea is fully consolidated in the market due to its historical presence in the shipping transport and the innovation provided in the wheeled traffic, as well as in ships, terminals and facilities. The presence of ACCIONA is well considered not only at a national level but also internationally. One of the reasons that makes its services more appreciated is the wide geographical and sectorial positioning which help to provide solutions for distribution and logistics in more than one sector.

Underway collaborative projects with clients

Improvement of the accessibility of the vessels in toilets for disabled passengers:

- Bathrooms, access and design of cabins.
- Collaboration with the ONCE Foundation for the adequacy of the design to the needs of these stakeholders.

Integration of cultures: Vessels operating in the south-Strait zone have been adapted to allow Muslims to have mosques, washbasins for religious rituals, food tailored to their beliefs, and so on. As part of this initiative, the Company has also worked with the DGT (Spanish traffic organization) for the creation of rest areas for people that travel to or from the south and has reduced waiting times to cross the Strait from 2 days to 45 minutes.

Improvement of conditions for truck drivers: the drivers of trucks engaged in long journeys receive a more personalized treatment by having their specific rooms, the same food as the ship crew, drinks, special pricing and priority treatment in the allocation of cabins.

Programs for residents: the Company offers reduced rates for residents in Ceuta, Melilla, Canary and Balearic Islands additional to those for being registered in the cities, to facilitating the dependence with the Iberian Peninsula.

Customer service

To offer clients shipping services that meet their specific needs, the Company has reactive methods (The Voice of the Client, Complaint forms, etc.) and proactive (Marketing Studies, Quality Surveys, etc.) for the detection of these needs. In this sense, ACCIONA Trasmediterranea has recently opened a Shared Services Center that includes a customer service and a travel agency (ACCIONA Travelling) whose purpose is to provide clients a permanent communication channel for bookings, queries or suggestions and for the resolution of complaints or incidents.

The Customer Service introduced in 1998 a survey system to measure and control the level of client satisfaction. The results of these studies and analysis provide information for the improvement of existing services or for the creation of new ones.

The Company processes all documents received through The Voice of the Client, the channel that ACCIONA Trasmediterranea offers the traveler to give its opinion. In all cases the Company provides a written response and, as far as possible, offers a tailored solution.

Likewise, ACCIONA Trasmediterranea has established a Commitment of Time against delayed departures or suspensions, which provides financial compensation and alternative arrangements for passengers in case of incidents.

7.3. Suppliers

ACCIONA Trasmediterranea has more than 1500 suppliers in its database. To guarantee a control of their services, the Company has developed a general procedure in its Quality Management System called Communication and Control of suppliers, according to which it has established a classification based on risk criteria and frequency and has selected those that have:

- Low risk but high frequency
- High-risk but low frequency
- High Risk and High Frequency

According to this model, a total of 60-80 suppliers are selected as representative of 98% of the turnover of the Company and all of them are evaluated using Criteria for the Evaluation.

Once evaluated, these suppliers are classified in an approval level (first to fourth), which in turn determines the frequency of re-evaluation to maintain the continuously updated Registry of Approval. To ensure transparency and fairness, the Company has recently created a mailbox through which the users may report any deficiencies with the reliability of supplies (quality, time and administrative) so as the Department of Purchasing can contact the supplier for corrective measures.

All suppliers of ACCIONA Trasmediterranea that may have some kind of environmental impact are also monitored through a procedure of the EMS called Environmental Communication and Control of Suppliers. According to this procedure, all suppliers receive a letter in which they are informed about the Environmental Management System implemented

in the Company and the environmental requirements for each business. This letter has to be signed by the supplier as a measure of commitment.

7.4. Local Communities

The major public contributions of ACCIONA Trasmediterranea in the social and environmental field to the local communities are:

- Maritime Public Services
- Straits Crossing Operation (OPE)
- Contribution to policy development in the Maritime Sector

Maritime public services

Since 1920, ACCIONA Trasmediterranea has been providing maritime public services under contracts of five years on itineraries considered of public interest with a preset definition of regularity, frequency, capacity and quality.

In 2006, ACCIONA Trasmediterranea renewed its contract for its services of public interest in the three maritime zones (South, Balearic and Canary Islands) so the entire fleet of ACCIONA Trasmediterranea is designed or purchased with a commitment to adapting to the particular conditions of these contracts (authorization, military, etc.).

Straits Crossing Operation (OPE)

The geographical position of Spain between Africa and Europe makes it play a role in the communication and provision of associated services between those two continents. One of the most important is the so-called Straits Crossing Operation (OPE), which ensures every year the access of hundreds of passengers from the Iberian Peninsula to North African countries in the best conditions and in the most efficient possible way.

This operation takes place from mid June to mid September. During this period an average of 10,270 rotations are performed to allow the transportation of 2.8 million passengers and 741,000 vehicles.

ACCIONA Trasmediterranea contributes to its success providing all necessary resources and experience in maritime transport of passengers offering around 40,000 seats a day, a dozen ships and high speed ferries operating in the connections Algeciras-Tangier, Algeciras-Ceuta, Malaga-Melilla, Almeria-Melilla, Nador-Almeria, Almería-Ghazaouet and Alicante-Oran in both directions.

Contribution to policy development in the Maritime Sector

ACCIONA Trasmediterranea is involved in projects that contribute to the development of maritime sector policies collaborating with associations and foundations as Innovamar, ANAVE, Short Sea Shipping Spain, Spanish Maritime Cluster, etc. In this regard, ACCIONA Trasmediterranea is currently participating in 7 R&D projects in the maritime sector, including:

- **2 Projects in collaboration with the Spanish Government (framed within the CENIT Program and the AVANZA Program):** designed to promote cooperation between enterprises, universities and Government to boost research and development.
- **5 Projects in collaboration with the European Commission (framed within the Seventh Framework Program FP7):** ACCIONA Trasmediterranea participates, as a private Company, in the development of different projects of the European Commission Framework, making it a very enriching experience for both the Company itself and for the advancement of the maritime industry on an international scale.

7.5. Society

ACCIONA Trasmediterranea, as a traditional Company, has worked throughout history in many projects since it has a strong social culture:

- **Collaboration in sea rescue exercises:** A ship of ACCIONA Trasmediterranea is annually selected by the government to perform an exercise that evaluates the ability

of emergency response on board and the coordination between the agencies and governments that are involved in an emergency.

- **Collaboration with NGOs:** The Company provides regularly free tickets for the transportation of volunteers, food and goods from Spain to Africa. In 2008, ACCIONA Trasmediterranea collaborated with the following organizations:
 - ATLAS TOURS Group
 - Panáfrica
 - Barcelona Acció Solidària
 - www.hu-man.org
 - www.sonrisamedica.org
 - Dentistas sobre ruedas

Also, the Company has been involved throughout history in numerous projects, which include:

- Sponsorship of the Maritime Museum of Barcelona
- Member of the Committee that oversees the Quality Certification in Ports
- Sponsorship of the Nautical Week of Melilla
- Transport of the Paris-Dakar vehicles

8. Sustainability Monitoring and Reporting

ACCIONA Trasmediterranea has developed a detailed control system of its major environmental aspects through the different procedures of its Environmental Management System. In each of the procedures, the environmental parameters to control are defined with the frequency, the method of conducting the measurement and, when applicable, its registration.

With the aim to monitoring the environmental performance of the Company, data from the operational control on each vessel, delegation and workshop are periodically collected (monthly for vessels and quarterly at delegations and workshops). These data make up the so-called Environmental Indicators System of the Company, which allows the establishment of the necessary corrective measures when deviations are detected from the optimal values of operating or from the environmental objectives and targets set.

To strengthen the analysis and treatment of the indicators, these data (consumption, waste, spillages, emissions, quality etc.) are introduced every six months in the ACCIONA tool called METRICA AMBIENTAL (corporate tool for storing and analysing environmental data). Key features of the procedure include flexibility, precision, effectiveness and transparency; enable the Company to measure the information resulting from improvement actions. This software collects all the information necessary to develop the annual Sustainability Report of ACCIONA which includes information from all the companies of the Group.

ACCIONA Trasmediterranea is currently working on the development of its own Environmental Report which will be published every 2 years and will incorporate detailed information of its activity, environmental performance, lines of action and its commitment with future generations in Sustainability.

9. Working Lines for the Future

The Company is working on the development of an *Integral Plan on Sustainability* that will cover all the major aspects of Corporate Responsibility:

- Sustainability Policy
- Objectives and Training Plan on Sustainability
- Integration of Quality and Environmental Management Systems
- Action Plan on Stakeholders
- Code of Ethics
- Plan to Improve Accessibility in ships
- Equal Opportunities Plan
- Sustainability Report

10. Conclusion

Corporate Responsibility Practices are getting more and more common in companies that try to channel their activities in a sustainable way, not only for their own benefit but for the benefit of the entire society.

In this regard, it is important to consider a number of key factors that determine the implementation of a Corporate Responsibility strategy such as the development of management systems (quality, environment, safety and security, occupational safety and health, etc.), a climate change strategy or methods of interaction with the different stakeholders to develop an appropriate management model that incorporates all these elements and is therefore as complete as possible.

The present study is a tool for the dissemination of the methodology used in ACCIONA Trasmediterranea as part of a large group of companies whose primary concern is the contribution to sustainable development.

After developing a system as the one described above, it will be essential to comprise adequate tools for monitoring and measurement. These tools are necessary to determine the effectiveness of its implementation and to detect early deviations of the different indicators and parameters. It will also be essential to develop a good internal and external communication strategy for disseminating all the actions carried out.

This study is only an example of the different alternatives that can be useful to direct a company towards sustainable management.

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