AMIANTOP

Industrial model for the definitive elimination of asbestos.

CONFIDENCIAL DOCUMENT
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AMIANTOP

Definitive industrial elimination of asbestos.

AMIANTOP

Definitive Structural Elimination of Asbestos

Technical and Institutional Dossier
for the comprehensive environmental, industrial, and administrative permitting process of the FS GREEN® 10-08A Project.

La Rioja · Spain · 2026

Strategic Industrial Project

High-temperature thermal plasma mineral transformation technology
(Non - combustion process)

Also known as “Cold Plasma”
Ref. RCR9–FS10–08A

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EDITORIAL NOTE

The purpose of this document is to present, in a structured manner, the technical, territorial, and industrial approach of the AMIANTOP model for the definitive elimination of asbestos.

AMIANTOP is not conceived as a theoretical proposal nor as an incremental improvement of the existing management model, but as an industrial infrastructure designed to structurally resolve an environmental liability of intergenerational scale.

The content is presented with a technical and institutional purpose, integrating analysis of the problem, technological foundations, the operational framework, and the structural impacts resulting from its deployment.

This document does not constitute a commercial offer, but a technical presentation of the model and its potential contribution to public policies, territorial planning, and sustainable industrial strategies.

INTRODUCTION

Asbestos management represents one of the greatest structural challenges inherited by European public policies in terms of public health, environmental protection, and territorial planning.

Decades after its ban, millions of tons of asbestos-containing materials remain embedded in buildings, infrastructure, and industrial facilities. The prevailing model of removal and landfill storage has reduced immediate risks, but it has neither altered the physical nature of the material nor eliminated its long-term hazardous potential.

In this context, the **AMIANTOP** model proposes a conceptual evolution: replacing the logic of indefinite storage with an industrial infrastructure oriented toward structural transformation of the material and the definitive elimination of risk.

This dossier sets out the technical foundations, the operational framework, and the structural impacts of this approach.

The technological development underpinning AMIANTOP has been conceived by **EFI Ecotech Group**, integrating industrial capabilities and specialized technical expertise in collaboration with **RCR**, within a vision oriented toward structural and replicable solutions.

METHODOLOGICAL NOTE

This document has been prepared based on the technical and conceptual development of the AMIANTOP project by its promoters.

In the drafting, structuring, and graphic representation process, advanced tools supporting editing and document modelling have been used, including systems based on artificial intelligence, under technical supervision and expert human validation.

The graphs and diagrams included are illustrative and conceptual and do not replace, under any circumstances, the technical, regulatory, or engineering documentation supporting the project.

The content, industrial criteria, and strategic decisions reflected in this document are the full responsibility of the project leaders.

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Industrial infrastructure for the structural elimination of asbestos

1 - GENERAL FRAMEWORK AND STRUCTURAL SYNTHESIS

1.1 Nature of the Project

AMIANTOP constitutes a strategic industrial infrastructure conceived for the definitive elimination of the risk associated with asbestos through the application of FS Green® technology developed by EFI Ecotech Group, within a controlled, traceable technical environment fully integrated into the applicable regulatory framework.

The project is promoted with the participation of RCR as a specialized operator in the management of asbestos-containing materials in regulated environments, integrating technological development and industrial implementation within a single coherent operational structure.

AMIANTOP replaces the traditional model based on removal and long-term storage with an industrial process oriented toward the irreversible material transformation of the waste, eliminating the physical basis of its hazardous properties and thereby structurally closing the risk cycle.

Unlike approaches based on encapsulation, confinement, or landfill disposal, AMIANTOP proposes a structural shift in the management of the problem: **acting on the physical nature of the material to eliminate its hazardous properties irreversibly.**

1.2 Structural Problem

Asbestos remains present in millions of tonnes distributed throughout European and global territories.

The massive use of asbestos over decades in roofing, piping, insulation, and industrial structures has generated a distributed and heterogeneous accumulation, whose progressive removal represents a major technical, logistical, and budgetary challenge for public administrations.

Its removal is a progressive obligation from both a regulatory and public health perspective; however, the predominant post-removal management model — based on disposal in hazardous waste landfills — does not eliminate the risk but merely transfers it over time.

This approach generates:

- Long-term environmental liabilities.
- Intergenerational monitoring and maintenance obligations.
- Dependence on permanent storage infrastructure.
- Sustained public expenditure.

The asbestos problem is not merely logistical or administrative; it is a physical problem.

As long as its fibrous structure remains intact, the risk to public health persists.

This physical nature of the problem requires an equally physical and irreversible solution.

1.3 Technical Approach

AMIANTOP applies FS Green® technology as an industrial solution oriented toward the irreversible structural transformation of the material, operating within a closed and hermetic technological circuit, without combustion processes and with permanent monitoring of critical parameters.

The result is the definitive elimination of the hazardous properties associated with asbestos, preventing the generation of new liabilities and reducing dependence on hazardous waste landfills.

The project architecture incorporates from its design stage:

- Hermetic technological system.
- Automated control and continuous supervision.
- Integrated industrial safety criteria.
- Consistency with the current and prospective regulatory framework.

This approach transforms asbestos treatment into a standardizable, auditable, and replicable industrial process, overcoming the management model based exclusively on confinement.

1.4 Impact and Implications

The AMIANTOP project generates positive impact at multiple levels:

Public Health

- Structural reduction of the risk associated with future exposure.

Environmental

- Elimination of the liability rather than its indefinite storage.

Climate

- Estimated reduction of approximately 16,240 tonnes of CO_2/year in base configuration (9,8t/day), with industrial scalability capacity.

Industrial and Energy

- Integrated generation of electricity and hydrogen as technological vectors of the process, together with the recovery of valorisable mineral fractions.

- The valorisation of mineral fractions such as magnesium oxide (MgO), silicon dioxide (SiO_2), and combined mineral fractions enables integration of the project into existing industrial value chains, reducing secondary waste generation and promoting the circular economy.

1.5 Institutional Framework and Support

AMIANTOP is based on the convergence between:

- The technology developed by EFI Ecotech Group.
- The operational expertise of RCR in the real management of asbestos-containing materials in regulated environments.

The project is currently undergoing administrative processing and has been conceived to integrate into the applicable regulatory framework, ensuring technical, operational, and regulatory coherence.

This technological and operational convergence constitutes the structural foundation of the AMIANTOP project.

1.6 Synthesis

AMIANTOP does not merely represent an evolution in asbestos management, but a change in logic:

Replacing indefinite storage with the irreversible material elimination of risk.

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2 -THE STRUCTURAL PROBLEM OF ASBESTOS

2.1 Scale and Territorial Dimension

Asbestos was widely used for decades due to its thermal, mechanical, and chemical resistance properties. Its massive incorporation into roofing, insulation, piping, structural components, and industrial applications has generated an extensive, heterogeneous, and territorially distributed presence across Europe.

Despite its progressive prohibition, millions of tonnes of asbestos-containing materials remain integrated within public and private buildings, industrial infrastructure, logistics facilities, technical networks, and consolidated urban environments. This reality constitutes a large-scale accumulated environmental liability whose management cannot be addressed as a punctual or localized phenomenon.

The natural ageing of these structures progressively increases the risk of degradation and fibre release, raising potential population exposure and generating growing pressure on removal, confinement, and specialized storage systems.

The territorial dimension of the problem is defined not only by its volume but by its structural and distributed nature: asbestos forms part of the built infrastructure inherited from the 20th century. Consequently, strategies based exclusively on removal and indefinite storage transfer the risk over time without modifying its material basis.

The cumulative magnitude, geographical dispersion, and intergenerational projection of the liability require technically robust, structurally sustainable solutions capable of acting upon the physical nature of the material.

2.2 Public Health Risk

The hazardous nature of asbestos is directly linked to its microscopic fibrous structure. When these fibres are released and remain airborne, they may be inhaled and lodged within the respiratory system, generating severe pathologies after prolonged latency periods.

Image 1. Technical intervention on roofing with potential asbestos fibre release. Material handling requires strict safety protocols to minimize airborne exposure risk.

The risk associated with asbestos does not disappear over time. On the contrary, the progressive deterioration of asbestos-containing materials increases the likelihood of fibre release if not properly and structurally addressed.

Unlike other industrial waste streams whose hazardous properties may be neutralized through conventional physico-chemical processes, asbestos retains its harmful capacity as long as its fibrous morphology remains intact. Therefore, mere containment or storage does not eliminate the intrinsic risk but defers it over time and transfers it to future generations.

In this context, asbestos management is not merely a technical issue of maintenance or regulatory compliance, but a medium- and long-term public health matter with sanitary, environmental, economic, and territorial implications.

The accumulated scale of asbestos in Europe makes its treatment a strategic challenge at continental level. This challenge requires solutions that act on the material basis of the risk rather than exclusively on its external manifestations.

2.3 Predominant Model: Removal and Landfill

The currently dominant asbestos management model in Europe is structured in three successive phases:

1. Controlled removal of the material in accordance with specific safety protocols.
2. Packaging and transport as hazardous waste.
3. Disposal in authorized hazardous waste landfills.

Image 2. Disposal in an authorized landfill of asbestos-containing waste under the traditional prolonged confinement model.

This scheme has enabled the reduction of immediate exposure during asbestos removal operations, establishing rigorous technical procedures to protect workers and the population.

Packaging is commonly carried out using high-resistance polypropylene sacks (big bags) or other approved systems designed to contain the material during handling and transport under controlled conditions. These solutions provide an adequate level of short-term safety, provided they remain under technical supervision and in compliance with established procedures.

Image 3. Handling and temporary storage of asbestos-containing waste in approved big bags under established safety protocol.

Image 4. Mobile decontamination and logistical support unit devduring controlled asbestos removal operations.

However, from a structural perspective, the landfill model implies the prolonged storage of materials whose intrinsic hazardous properties have not been eliminated. Once deposited and buried, waste stability depends on the continued integrity of its containment systems and on the geotechnical and environmental conditions of the site.

Over time, waste compaction, ground stresses, and natural degradation processes may progressively alter initial confinement conditions. Consequently, the system requires permanent monitoring, maintenance of sealing infrastructure, and long-term control.

Conceptually, landfill constitutes a solution of confinement and storage, not a mechanism for definitive risk elimination.
The mineral nature of asbestos implies that its hazardous properties do not spontaneously degrade over time: as long as the crystalline fibrous structure remains intact, potential risk persists.

Although technically valid from an operational management standpoint, this model transfers the problem over time and generates intergenerational dependence on storage and surveillance infrastructure.

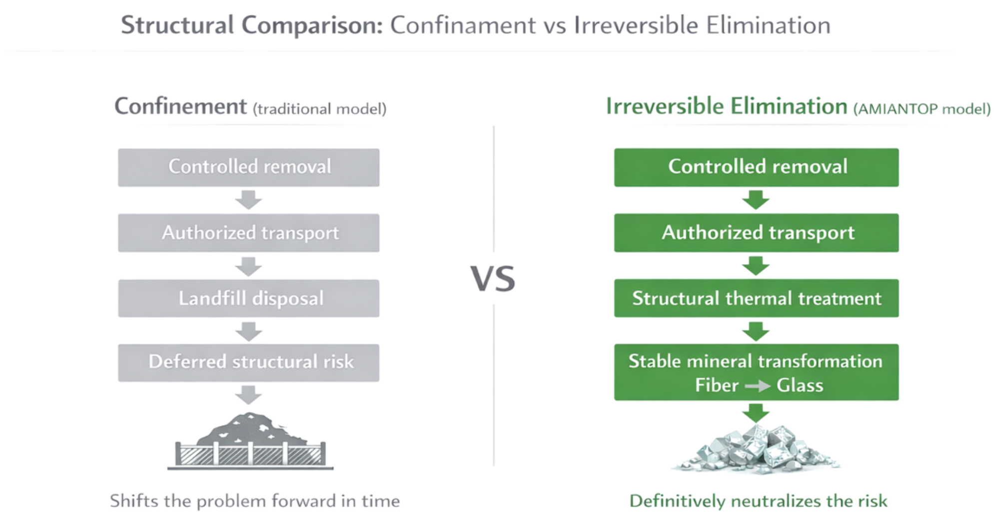

Figure 1. Structural comparison between the landfill confinement model and the irreversible mineral transformation model applied in AMIANTOP.

2.4 Generation of Intergenerational Liability

The indefinite storage of asbestos-containing waste consolidates a structural environmental liability.

From a territorial and temporal perspective, this model entails:

- Permanent occupation of industrial or specialized land.
- Requirement for long-term sealing, isolation, and monitoring infrastructure.
- Transfer of technical, environmental, and economic responsibility to future generations.
- Continued dependence on the availability and maintenance of authorized landfills.

Landfill does not eliminate the inherent risk of the material but confines it within a system whose stability must be guaranteed for decades. Waste management thus extends beyond the lifecycle of the buildings

or infrastructure where asbestos was originally used, generating an intergenerational monitoring obligation.
This scheme produces an accumulative liability whose magnitude increases over time, both through the continuous incorporation of new waste and through the need to maintain existing storage infrastructure.

From a structural standpoint, the current model resolves the operational urgency of removal but does not transform the mineral nature of the material nor eliminate its physical basis of hazardous properties. Consequently, technical and environmental responsibility is projected into the future, relying on the prolonged stability of confinement systems and decades-long surveillance.

2.5 Structural Limitations of the Current Approach

The model based exclusively on removal and storage presents structural limitations that prevent definitive resolution of the asbestos problem.

From a technical standpoint:

- It does not eliminate the intrinsic hazardous properties of the material.
- It does not alter its fibrous crystalline structure.
- It maintains the need for indefinite monitoring and control.

From a territorial perspective:

- It depends on storage infrastructure with limited capacity.
- It generates increasing pressure on specialized landfills.
- It commits industrial land for extended time horizons.

From an economic and strategic standpoint:

- It transfers long-term maintenance and supervision costs.
- It does not generate industrial or energy added value.
- It consolidates a reactive model based on confinement rather than transformation.

Given significant territorial scale and an increasingly demanding regulatory framework, the expansion of the landfill model alone does not constitute a structural response to the asbestos problem but rather an extension of deferred storage logic.

2.6 Need for a Definitive Industrial Solution

The risk associated with asbestos is physical and mineral in nature. As long as its fibrous structure remains intact, potential hazardous properties persist.

Structurally resolving the problem requires acting upon the material basis of the waste, irreversibly eliminating the properties that make it hazardous through industrial processes capable of modifying its crystalline structure and transforming it into stable, non-fibrous, and technically valorisable mineral compounds.

Within this framework, AMIANTOP proposes:

- Replacing an indefinite storage model with industrial infrastructure oriented toward structural transformation of the material.
- Moving from a logic of confinement to a logic of definitive risk elimination.
- Integrating treatment within a controlled, monitored, and energy-optimized industrial scheme.

From this perspective, the solution does not consist in isolating the problem over time, but in modifying its physical nature to definitively close the risk cycle.

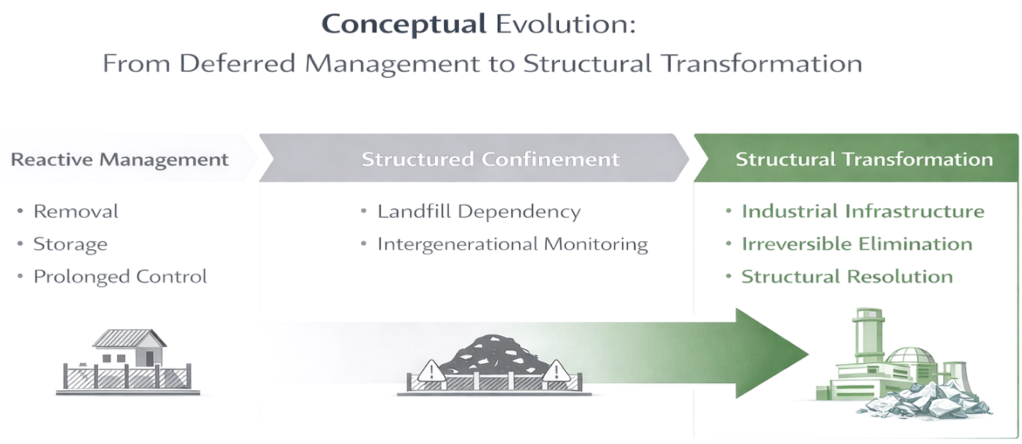

Figure 2. Conceptual evolution of the asbestos management model: from deferred storage-based management to irreversible structural transformation of the material.

3 - STRATEGIC VISION: FROM MANAGEMENT TO ELIMINATION

3.1 From Indefinite Management to Structural Resolution

Traditional asbestos management has historically focused on risk control: encapsulate, isolate, remove, and store.
This approach has reduced immediate exposure but has not modified the physical nature of the material. The risk remains latent as long as the fibrous structure of asbestos remains intact.

AMIANTOP is based on a different premise:

- A hazardous material ceases to be hazardous only when it irreversibly loses the physical properties that define its hazardous characteristics.

This shift in approach transforms asbestos management into a matter of industrial engineering oriented toward the structural elimination of risk.

It introduces a logic of industrial policy applied to the management of historical liabilities: the objective is not merely to remove and store, but to intervene in the physical nature of the material in order to definitively close the risk cycle.

3.2 The Problem as a Physical Phenomenon

Asbestos is not an administrative issue nor exclusively a regulatory one. It is a physical problem linked to a microscopic structure whose stability determines the persistence of risk.

As long as that structure exists:

- Potential hazardous properties persist.
- Risk requires control.
- Responsibility extends over time.

From this perspective, solutions based on storage constitute a strategy of containment, not resolution.

AMIANTOP addresses the problem at its material root: acting upon the physical structure to definitively eliminate the basis of its hazardous properties.

3.3 Irreversible Elimination as a Technological Objective

The objective of AMIANTOP is not to optimize storage nor to improve confinement, but to achieve irreversible structural transformation.

This implies:

- Replacing the logic of permanent control with a logic of definitive intervention.
- Reducing dependence on prolonged storage infrastructure.
- Preventing the generation of new intergenerational liabilities.

The irreversible elimination of risk substantially modifies the framework of territorial and environmental planning.

This transformation shifts the debate from waste management toward the engineering of structural neutralization of the material.

3.4 Integration within the European Framework

The approach adopted by AMIANTOP aligns with:

- European energy transition policies.
- The reduction of historical environmental liabilities.
- Circular economy principles.
- The need for structural industrial solutions to inherited challenges.

The project does not propose an incremental improvement of the existing model, but a transition toward a different industrial paradigm: from indefinite storage to structural transformation.

In this context, AMIANTOP is configured as a strategic infrastructure aligned with the European industrial transition aimed at the structural reduction of inherited environmental risks.

3.5 Paradigm Shift

The transition from management to elimination implies a conceptual shift:

- From containment to treatment.
- From confinement to industrial process.
- From accumulative liability to structural resolution.

This paradigm shift constitutes the foundation upon which the technological proposal developed by EFI Ecotech Group and applied within the framework of the AMIANTOP project is built.

The change is not merely operational but structural: it redefines the role of industry in the resolution of historical environmental liabilities.

This approach redefines asbestos management as an industrial engineering intervention oriented toward the material resolution of risk, rather than its temporary containment.

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4 - FS GREEN TECHNOLOGY APPLIED TO AMIANTOP

4.1 Physical Principle of Structural Transformation

The technology applied in AMIANTOP is based on an industrial process of irreversible structural transformation of asbestos through controlled thermal treatment within a completely hermetic environment.

The objective of the process is not to encapsulate or superficially stabilize the material, but to definitively modify its fibrous crystalline structure, eliminating the physico-chemical basis of its hazardousness properties.

From a material standpoint, asbestos is a silicate with a fibrous crystalline structure.

As long as that structure remains intact, the risk associated with the release of respirable fibres persists.

The adopted technological approach acts directly on that structure, inducing its mineralogical disorganization and transition toward a stable vitreous phase.

The result is not containment of risk, but its structural elimination.

4.2 Transformation Process

Asbestos-containing waste is introduced into a completely closed system and subjected to a controlled thermal cycle within high-temperature chambers.

During this process, the following occurs:

- Irreversible breakdown of the fibrous crystalline network.
- Melting of the material and total loss of its original morphology.
- Transition toward a stable vitreous mineral matrix.

The technological circuit operates under hermetic conditions, with automated control and continuous supervision of temperature, pressure, and process stability.

There is no open combustion or uncontrolled oxidation.

The transformation is carried out under monitored and reproducible parameters, ensuring operational stability and technical traceability.

4.3 Industrial Architecture of the System

The AMIANTOP infrastructure is organized into integrated functional modules:

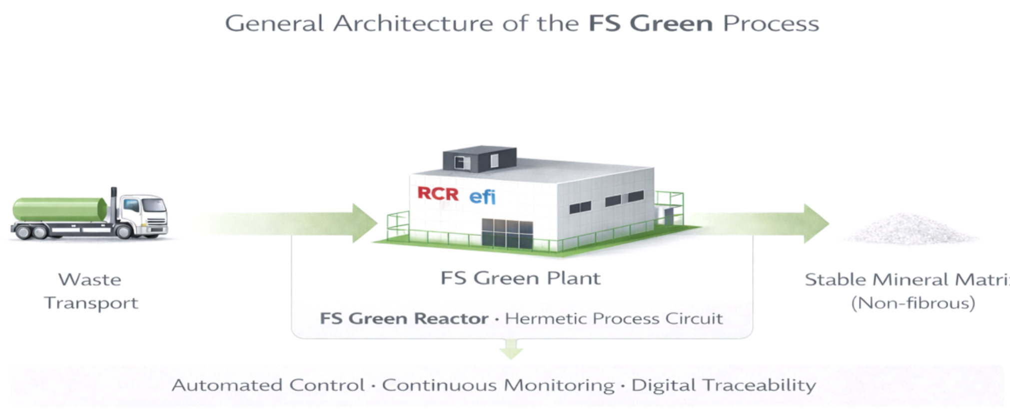

Figure 3. General architecture of the industrial process of structural asbestos transformation through FS Green® technology applied in the AMIANTOP infrastructure.

1. Controlled reception and preparation of the material.
2. Introduction into the closed system.
3. Structural thermal transformation.
4. Progressive cooling of the molten mineral phase.
5. Classification and management of resulting fractions.

The entire system operates within a hermetic technological circuit designed to:

- Prevent uncontrolled particle release.
- Ensure stability of operational parameters.
- Enable full process traceability.

Industrial automation incorporates:

- Continuous monitoring of critical variables.
- Real-time environmental supervision.
- Digital recording of operational parameters.

- Integrated industrial safety protocols.

This design ensures reproducibility, stability, and technical coherence of the system.

4.4 Fully Hermetic System

One of the differentiating elements of the model applied in AMIANTOP is its structurally closed configuration.

The material does not come into contact with the external environment during treatment.

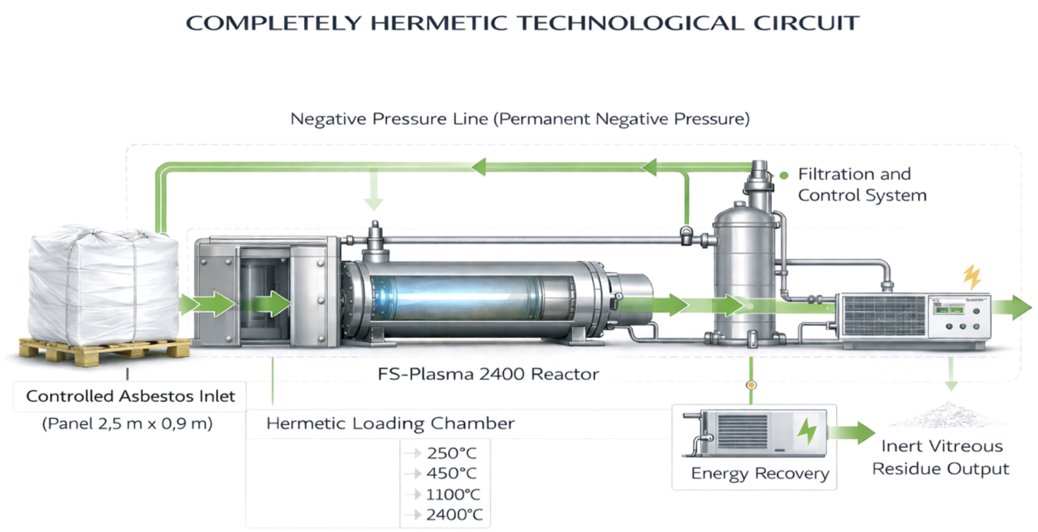

Figure 4. Functional diagram of the hermetic technological circuit of the FS Green® system, based on a horizontal reactor operating under permanent negative pressure, with integrated filtration, energy recovery, and total containment at all stages.

The hermetic architecture of the system:

- Minimizes operational risks.
- Reduces personnel exposure.
- Controls emissions at source.
- Prevents secondary contamination.

This approach responds to advanced industrial safety and environmental control criteria applicable to facilities operating with hazardous waste.

4.5 Absence of Combustion

Unlike conventional thermal treatments associated with incineration or oxidation, the system applied in AMIANTOP is not based on material combustion.

The process is conducted in a controlled environment, without flame and without open oxidation, which allows:

- Avoidance of typical incineration processes.
- Exclusion of combustion-derived by-products.
- Maintenance of thermal stability under defined parameters.
- Operation within a monitored closed circuit.

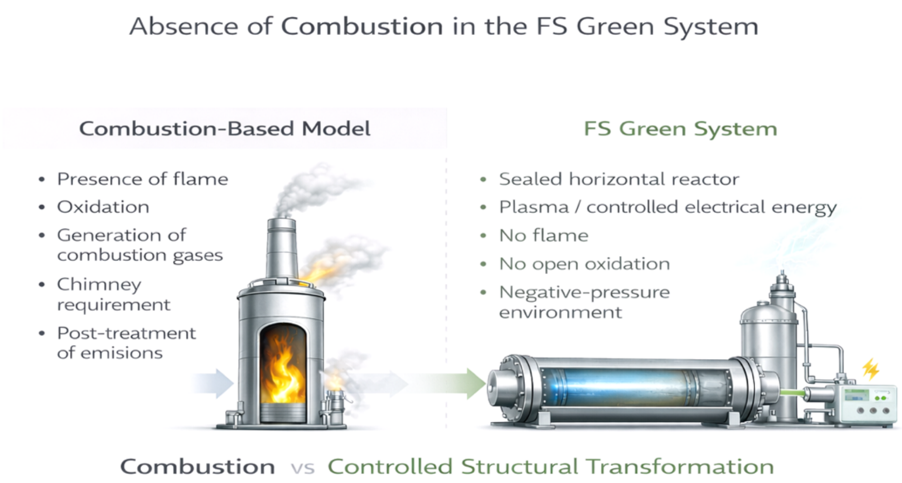

Figure 5. Conceptual representation of the absence of combustion in the FS Green® system, differentiating it from oxidation- and flame-based thermal processes.

The design is oriented toward structural transformation of the material rather than its destruction through combustion, constituting an essential distinction from traditional thermal models.

4.6 Process Outcome and Mineral Stabilization

Following the process, the fibrous structure of asbestos is transformed into a stable vitreous mineral matrix, fundamentally composed of consolidated mineral oxides originally present in the material.

Among the resulting fractions:

- Magnesium oxide ($MgO \geq 90\%$)
- Silicon dioxide ($SiO_2 \geq 90\%$)
- Combined mineral fraction (stabilized mixture of other oxides)

As a consequence of the transformation:

- The characteristic fibrous structure disappears.
- The material acquires physico-chemical stability.
- The hazardous properties associated with fibre inhalation are eliminated.
- Management as hazardous waste is no longer required.

The final product presents as a technically stable solid vitreous residue, suitable for valorisation as secondary raw material in controlled industrial applications, including:

- Cement industry.
- Glass industry.
- Construction materials manufacturing.

This approach replaces an indefinite storage model with a structural transformation model allowing subsequent industrial integration.

4.7 Energy Integration

The technological architecture applied in AMIANTOP incorporates integrated energy management that enables:

- Generation of electricity for self-consumption or grid integration.
- Production of hydrogen as a process gas.
- Optimization of the system's internal energy balance.

This integration reinforces the project's industrial coherence and contributes to its alignment with European energy transition and decarbonization objectives.

4.8 Applicable Technical Regulatory Framework

The technological development applied in AMIANTOP is framed within compliance with European and national provisions relating to:

- Hazardous waste management.
- Public health protection against asbestos fibre exposure.
- Industrial emissions and integrated environmental control.
- Industrial safety and risk prevention.
- Traceability and extended operator responsibility.

The industrial model has been conceived to integrate into the corresponding environmental authorization regime, ensuring coherence between technological design, industrial operation, and current and foreseeable regulatory requirements.

The irreversible structural transformation of the material enables replacement of indefinite storage with a model compatible with European principles of:

- Progressive elimination of historical liabilities.
- Circular economy.
- Industrial decarbonization.
- Long-term structural risk reduction.

4.9 Technological Differentiation from Conventional Thermal Models

The system applied in AMIANTOP is technologically and operationally distinct from conventional thermal treatments based on incineration or open combustion.

Structural differences include:

- It does not operate through waste combustion.
- It does not pursue mere volumetric reduction.
- It does not generate typical open-oxidation by-products.
- It operates within a fully hermetic technological circuit.
- It is oriented toward irreversible crystalline transformation of the material.

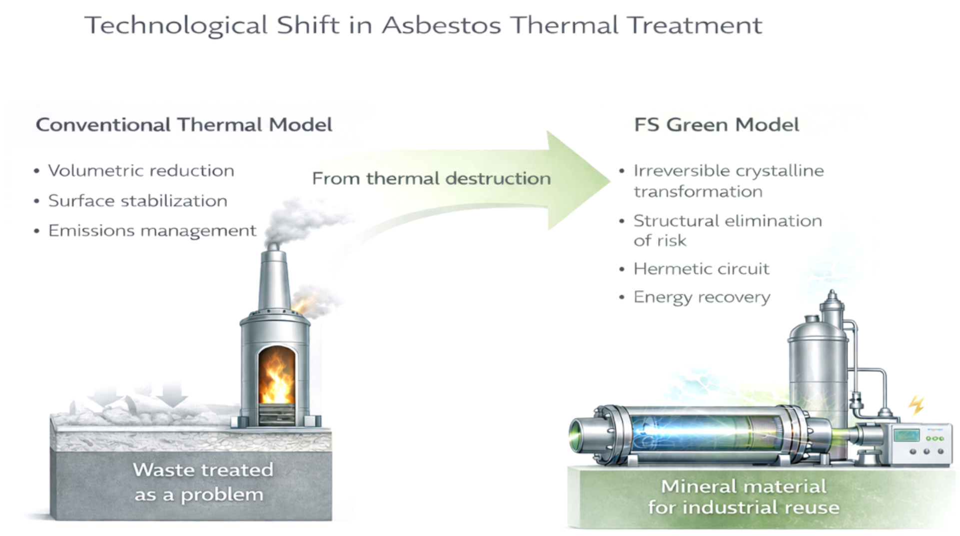

Figure 6. Conceptual differentiation between conventional thermal models and the structural approach applied in the FS Green® system.

Whereas traditional thermal models focus on destruction or superficial stabilization of waste, the approach applied in AMIANTOP acts upon the structural nature of the material, eliminating the physical basis of its hazardousness properties.

The distinction is both technological and conceptual: from waste management to structural risk resolution.

4.10 Industrial Safety and Integrated Environmental Control

Industrial safety constitutes a structural axis of AMIANTOP's design.

From its conception, the model incorporates:

- A completely closed and automated system.
- Continuous control of temperature, pressure, and operational stability.
- Real-time environmental monitoring.
- Digitally traceable process recording.
- Exclusion of uncontrolled emissions.

This approach enables:

- Minimization of operational risks.
- Reduction of personnel exposure.

- Guaranteed thermal stability under defined parameters.
- Facilitation of technical verification and regulatory auditing.

Environmental control is not incorporated as a corrective measure, but as a constitutive element of technological design.

4.11 Integrated Control of Critical Process Parameters

The operation of the AMIANTOP system is based on continuous and automated control of critical parameters determining thermal stability, operational safety, and environmental integrity.

From its conception, the technology integrates permanent supervision acting upon key variables, including:

- Temperature by thermal zones (drying, preheating, intermediate formation, and maximum energy zone).
- Permanent negative pressure within loading chamber and reactor.
- Gas flow and composition within the internal circuit.
- Energy consumption and electrical system stability.
- Structural integrity and operating conditions of the horizontal reactor.

Each variable is monitored in real time through strategically distributed sensors connected to a digital control system enabling:

- Automatic adjustment of operating conditions.
- Continuous and traceable recording of the process.
- Preventive activation of safety protocols.
- Documentary verification for technical and regulatory audit.

The model operates not on estimated parameters but on measured and verified operational data, ensuring thermal stability under defined values and reducing variability inherent to conventional thermal treatments.

Control is not an additional layer, but a structural element integrated into the technological design.

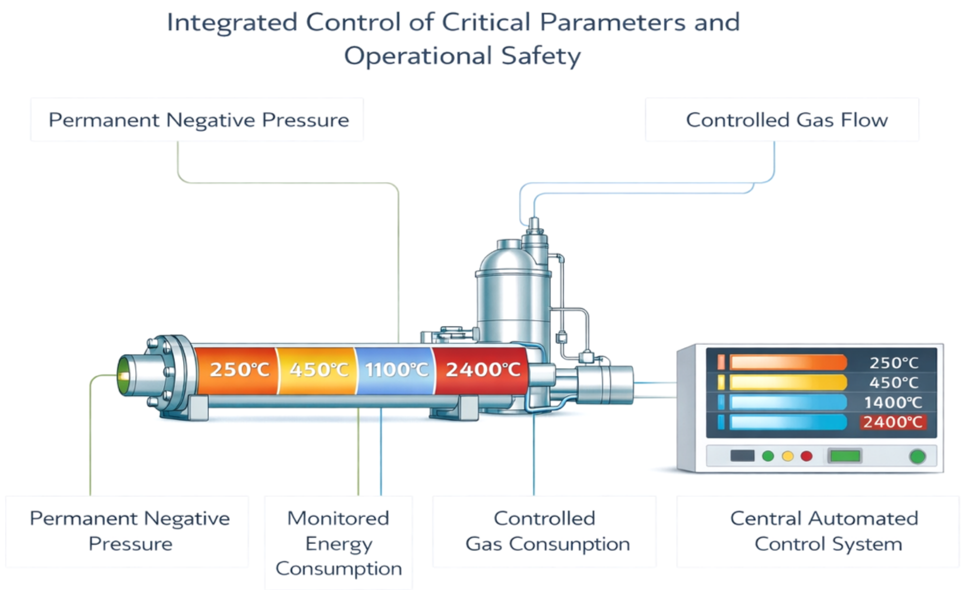

Figure 7. Integrated system of control, industrial safety, and real-time monitoring of the FS Green® process, including supervision of critical parameters, permanent negative pressure, digital traceability, and exclusion of uncontrolled emissions.

4.12 Systemic Integration and Operational Coherence

The system applied in AMIANTOP must not be interpreted as a sum of independent modules, but as an integrated technological architecture in which mineral transformation, industrial safety, environmental control, and energy recovery form part of a single operational ecosystem.

From its conceptual design, each subsystem is interconnected and coordinated:

- Structural hermeticity conditions environmental control.
- Environmental control feeds the monitoring system.
- Monitoring regulates thermal behavior.
- Thermal stability ensures irreversible crystalline transformation.
- Energy recovery optimizes overall system performance.

This integration avoids the fragmentation typical of conventional models, in which thermal treatment, filtration, and environmental control are managed as successive stages rather than as a single coherent circuit.

The result is a unitary technological model where safety, energy efficiency, and structural risk elimination are conceived as inseparable components of the same industrial process.

Thus, environmental control is not incorporated as a corrective measure, but as a constitutive component of the design.

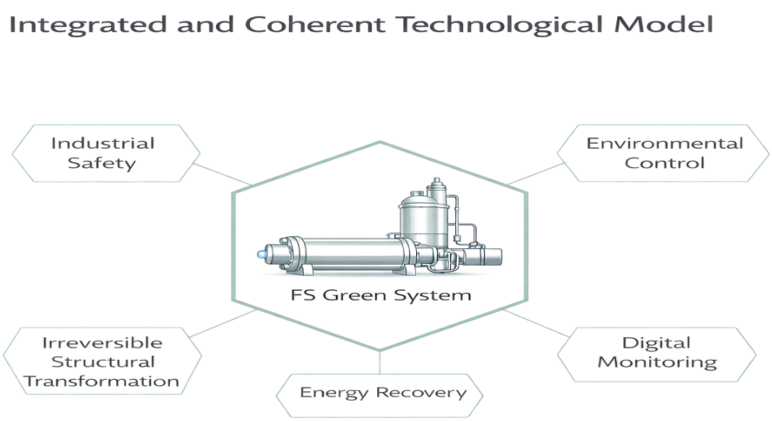

Figure 8. Systemic integration of the FS Green® model, showing structural interconnection between mineral transformation, industrial safety, environmental control, digital monitoring, and energy recovery.

5 - SAFETY AND ENVIRONMENT

5.1 Structural safety through hermetic technological design

The AMIANTOP infrastructure has been conceived under the principle of integrated safety from the engineering phase, incorporating structural prevention criteria into the system design.

Safety is not conceived as a corrective measure applied afterwards, but as a constitutive element of the technological model. The industrial architecture incorporates:

- Functional separation of operational areas.
- Minimization of direct manual intervention.
- Automation of critical process phases.
- Continuous monitoring of operational parameters.
- Redundant supervision systems.

This approach responds to a logic of risk elimination at source, consistent with the principle of irreversible structural transformation of the material.

5.2 Hermetic Technological Confinement

Treatment of asbestos-containing material is carried out within a completely closed technological circuit, preventing contact between the material and the external environment throughout the entire process.

The hermetic design of the system integrates:

- Primary containment of the material during transformation.
- Secondary containment in critical technical areas.
- Emission control at source.
- Thermal stability under defined and monitored parameters.

This model enables operation under a principle of integrated emission control at source, eliminating risks associated with particle dispersion and reinforcing the project's structural environmental protection.

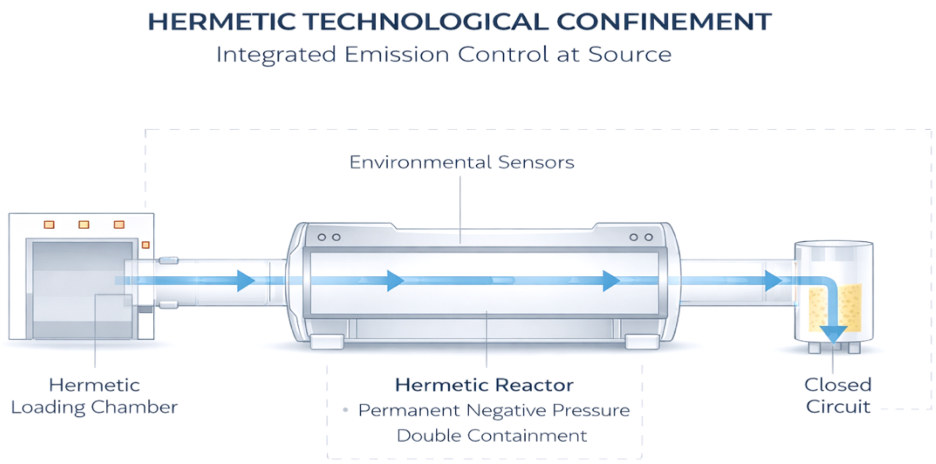

Figure 9. Integrated emission control model at source based on a hermetic technological circuit, primary and secondary containment, and permanent negative pressure, preventing primary and secondary emissions to the environment.

5.3 Advanced Monitoring and Digital Traceability

The system incorporates a continuous monitoring scheme ensuring operational stability and documentary traceability:

- Permanent control of thermal and pressure parameters.
- Supervision of internal reactor conditions.
- Digital recording of critical variables.
- Environmental monitoring at defined system points.

The generated information is auditable and ensures technical coherence, process reproducibility, and compliance with regulatory requirements applicable to industrial facilities and hazardous waste management.

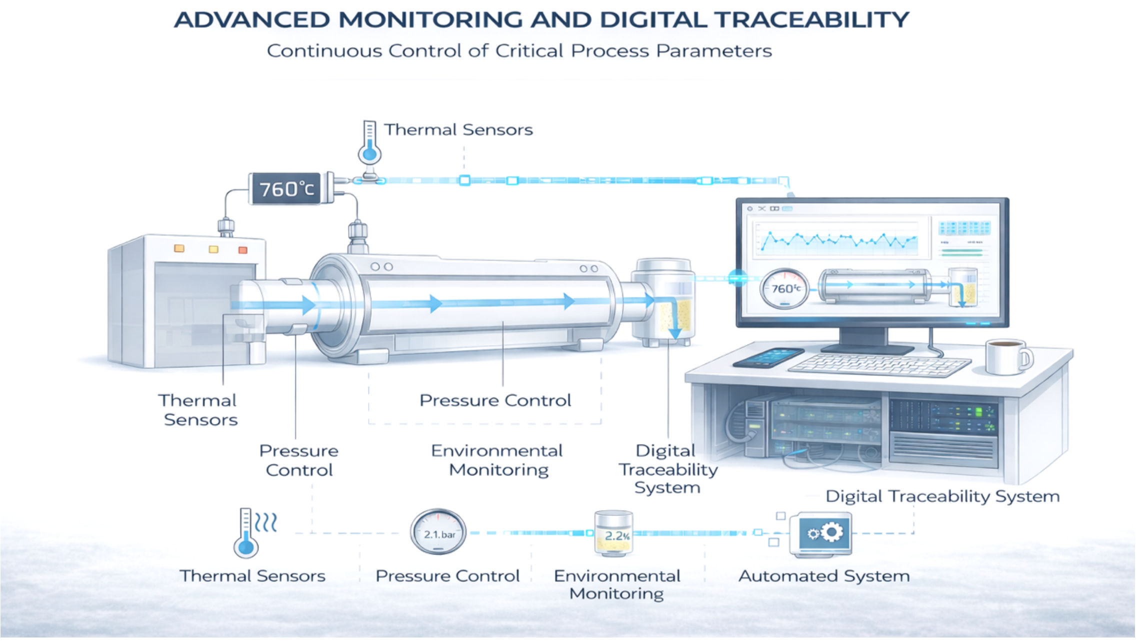

Figure 10. Advanced monitoring and digital traceability system of the FS Green® process, including continuous control of critical parameters (temperature, pressure, operational stability), traceable digital recording, and automated supervision within a hermetic environment.

5.4 Operational Culture and Certified Experience

The AMIANTOP project is supported by RCR's operational experience in the controlled removal and management of asbestos-containing materials in regulated environments.

This experience provides:

- Practical knowledge of safety protocols.
- Field-based risk management.
- Application of technical standards in sensitive operations.

Activities are carried out under certified environmental management and occupational safety systems in accordance with international standards, providing a structured and audited framework for industrial implementation of the model.

5.5 Structural Environmental Impact

The base AMIANTOP plant has been dimensioned for an approximate capacity of **9,8 tonnes per day of asbestos-containing material.**

In this configuration, the model enables an estimated reduction of approximately **16,240 tonnes of CO_2 annually** compared to schemes based exclusively on removal and prolonged landfill storage.

Additionally, the model avoids indirect greenhouse gas generation associated with prolonged landfill storage schemes, including potential methane (CH_4) emissions derived from anaerobic processes in final disposal environments.

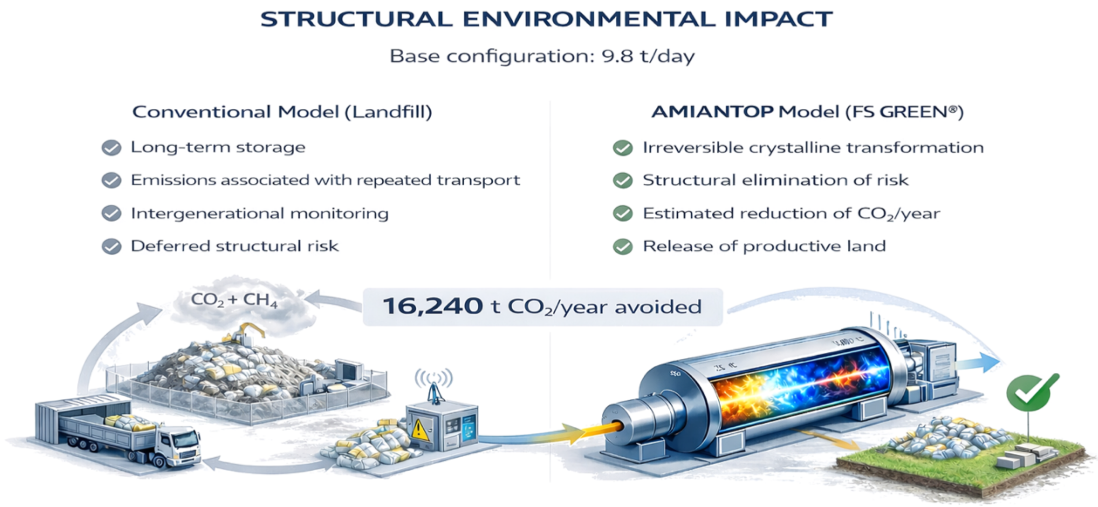

Figure 11. Structural environmental impact of the AMIANTOP model in base configuration of9,8 t/day, showing estimated CO_2 emission reduction compared to conventional removal and landfill storage schemes.

This estimate corresponds to the base configuration of 9,8 tonnes per day and is based on the integrated operational model described in this document.

The reduction is linked to:

- Logistical optimization.
- Elimination of indefinite storage infrastructure.
- Internal energy integration of the system.
- Partial substitution of virgin raw materials through mineral valorisation.

The model transforms an accumulative environmental liability into a controlled industrial flow, reducing medium- and long-term impacts associated with permanent storage.

5.6 Technological Scalability

The technology developed by EFI Ecotech Group has been conceived as a modular and scalable platform.

In addition to the base configuration of 9,8 t/day, developments exist for higher capacities (30 and 90 tonnes per day), adaptable to different territorial contexts.

Scalability enables:

- Adaptation to regional volumes.
- Replicability of the model.
- Territorial optimization.
- Increased structural impact without altering the central technological principle of definitive risk elimination.

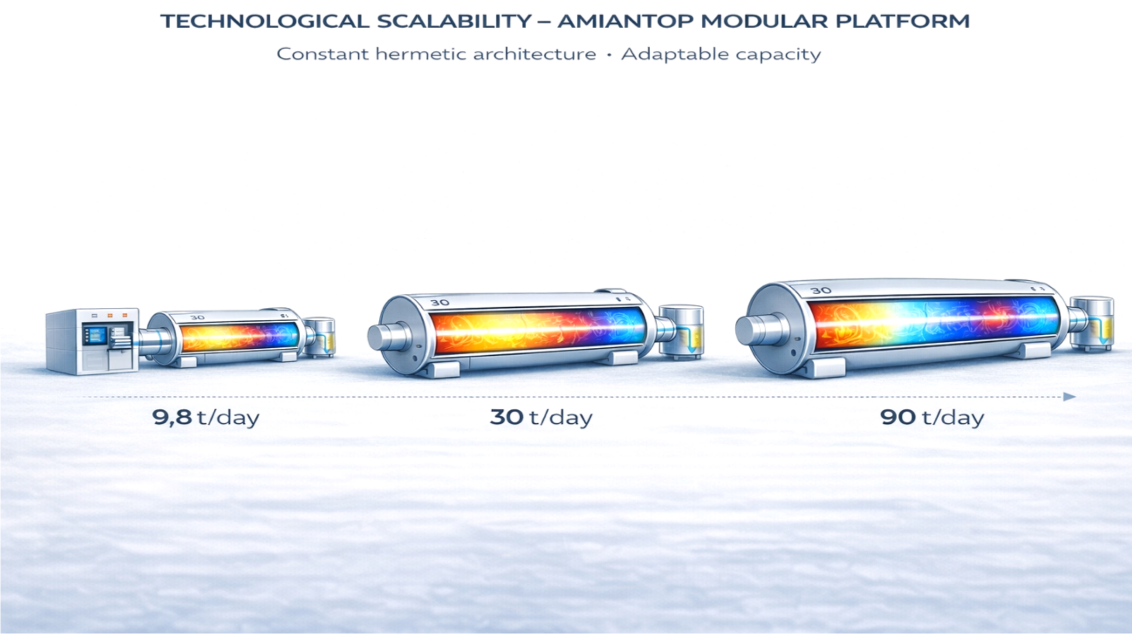

Figure 12. Modular architecture and progressive scalability of the AMIANTOP system (9,8 –30–90 tonnes/day).

5.7 Elimination of Environmental Liabilities

Unlike the landfill model, which entails indefinite storage of hazardous waste, AMIANTOP enables material transformation and elimination of its structural hazardousness properties.

This approach:

- Reduces the need for intergenerational monitoring.
- Decreases territorial pressure associated with specialized landfills.
- Prevents accumulation of new environmental liabilities.
- Releases land for productive uses.

Industrial intervention replaces a deferred management model with a structurally resolutive solution.

5.8 Regulatory Coherence

AMIANTOP has been conceived to integrate within the current regulatory framework in relation to:

- Hazardous waste management.
- Industrial safety.
- Environmental protection.
- Industrial emissions.

The project is currently undergoing administrative processing in accordance with the procedures required by applicable legislation, including the corresponding authorization instruments.

The technical architecture has been designed to ensure compatibility with current regulatory requirements and their foreseeable evolution.

6 - AMIANTOP INFRASTRUCTURE

Image 5. AMIANTOP industrial infrastructure – Base configuration with FS GREEN® technology (9,8 t/day).

6.1 Concept of Strategic Industrial Infrastructure

The AMIANTOP infrastructure materializes, at a specific industrial site, the operational application of the structural transformation model developed in the preceding chapters.

Conceived as an integrated industrial unit, it has been designed to operate under strict criteria of territorial, environmental, and regulatory compatibility, ensuring coherence between technology, physical implementation, and the applicable regulatory framework.

The project's implementation responds to:

- Industrial safety criteria.
- Controlled logistical accessibility.
- Integration within suitable industrial land.
- Compliance with required distances and technical standards.

The design ensures coexistence with the surrounding environment, minimizing impacts and guaranteeing operational control.
The implementation follows a structurally strategic industrial infrastructure model, conceived not as an isolated facility but as a territorial node for structural waste transformation, integrated into compatible industrial environments under preventive technical planning criteria.

6.2 Base Operational Configuration (9,8 t/day)

The base operational configuration of 9,8 tonnes per day integrates, within an autonomous industrial unit, the complete set of process, control, and environmental management systems of the AMIANTOP model.

This configuration constitutes the first territorial deployment scale and allows validation of the system's technical coherence under real industrial conditions, ensuring operational stability, full traceability, and regulatory compliance.

The base unit incorporates:

- Hermetic structural thermal transformation system.
- Sealed loading chamber and closed process circuit.
- Integrated gas purification and control system.
- Continuous monitoring of critical parameters.
- Internal energy management with recovery and optimization of the system's energy balance.

The architecture has been conceived under a scalable modular principle, allowing capacity expansion through the incorporation of replicable modules without altering the technological core or the structural coherence of the system.

Thus, the base configuration does not constitute an isolated solution but the first operational expression of an industrial platform adaptable to different territorial magnitudes.

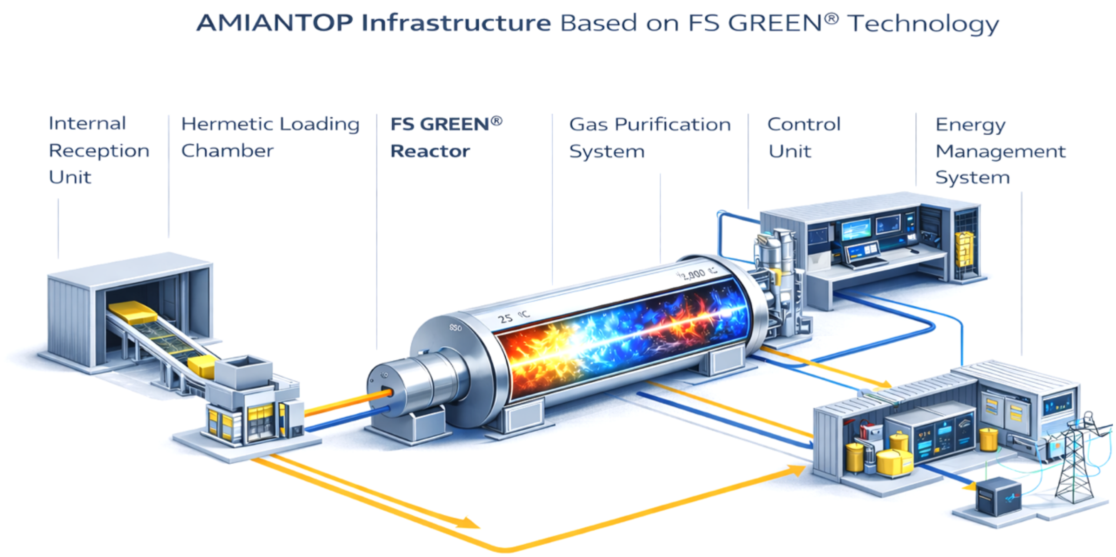

Figure 13. AMIANTOP base operational configuration (9,8 t/day), showing functional integration of the FS GREEN® reactor, sealed loading chamber, gas purification system, control unit, and energy management.

6.3 Functional Organization of the Plant

The AMIANTOP infrastructure is structured into differentiated functional areas, organized under a principle of preventive industrial compartmentalization aimed at maximizing safety, operational efficiency, and integrated environmental control.

The functional organization follows a coherent technical sequence in which each area fulfills a specific role within a unitary industrial circuit:

- Controlled reception zone for material entry, documentary verification, and initial preparation.
- Preparation and feeding area, where controlled introduction into the hermetic circuit is carried out.
- Technological core of structural transformation, integrating the horizontal reactor, thermal system, and automated control of critical parameters.
- Mineral fraction management area, dedicated to stabilization, classification, and technical storage of transformed products.
- Auxiliary energy and control systems ensuring energy recovery, continuous monitoring, and overall operational stability.

This organization does not follow a fragmented logic of independent successive stages but a unitary operational configuration in which each area is interconnected with the centralized control system.

Physical and functional compartmentalization reinforces structural safety, reduces operational exposure, and facilitates full traceability of the industrial process.

6.4 Energy Integration

The AMIANTOP infrastructure incorporates an integrated energy management system conceived as a structural component of the industrial model, rather than an accessory element.

The system design enables optimization of the internal energy balance through recovery and reuse of energy generated during the structural thermal transformation process.

Energy integration includes:

- Electricity generation for industrial self-consumption or grid integration in accordance with the applicable regulatory framework.
- Hydrogen production as a process gas integrated into the system's operational scheme.
- Thermal recovery and optimization of internal energy flows.
- Reduction of external energy dependence.

This approach reinforces operational self-sufficiency and improves overall system efficiency, aligning it with progressive decarbonization and industrial energy transition principles.

Energy is not incorporated as an incidental by-product but as an integrated vector within the technological architecture, contributing to structural coherence and long-term territorial viability.

Auxiliary energy and control systems ensuring energy recovery, continuous monitoring, and overall operational stability.

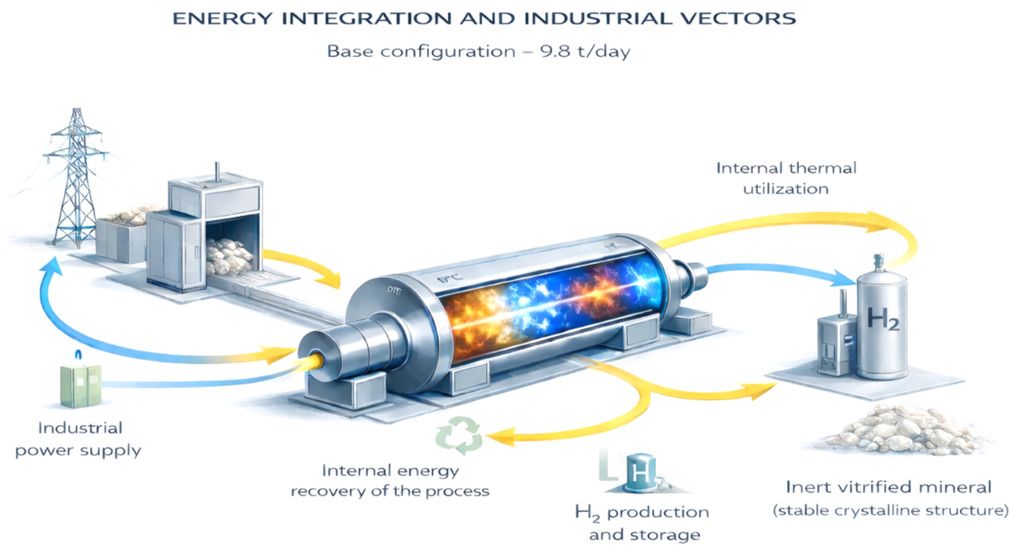

Figure 14. Energy integration scheme of the AMIANTOP (FS GREEN®) infrastructure, showing electrical connection, internal energy generation and recovery, hydrogen production as process gas, and optimization of operational energy consumption.

6.5 Modular Scalability

The technology developed by EFI Ecotech Group enables modular configuration of the infrastructure.

In addition to the 9,8 t/day base plant, the system can be adapted to higher-capacity configurations, including developments of 30 and 90 tonnes per day.

This modularity enables:

- Adaptation to different territorial volumes.
- Replicability at other locations.
- Progressive scaling according to regional needs.

Without altering the system's central technological principle.

This scalability positions AMIANTOP as a technological platform adaptable to different territorial scenarios while maintaining the invariant principle of structural risk elimination.

6.6 Administrative Phase

The technology developed by EFI Ecotech Group has been conceived under a principle of structural modularity enabling adaptation of AMIANTOP's operational capacity to different territorial magnitudes without modifying the technological core.

The base configuration of 9,8 tonnes per day constitutes the first scale of industrial deployment. From this unit, the model allows expansion through the incorporation of replicable modules maintaining:

- The fully hermetic architecture of the process.
- Automated control and continuous monitoring of critical parameters.
- Thermal and operational stability.
- The principle of irreversible mineral transformation of the material.

The currently developed indicative configurations include:

- 9,8 t/day → Base territorial deployment.
- 30 t/day → Regional scale.
- 90 t/day → Supra-regional scale or national progressive elimination programs.

Capacity increase does not modify the technological foundation but expands operational dimension according to the volume of existing environmental liability.

This scalability positions AMIANTOP as an adaptable industrial platform capable of integration within different regulatory and territorial contexts while maintaining technical coherence, operational stability, and structural environmental control.

6.7 Infrastructure as a Structural Solution

AMIANTOP is not configured as an isolated industrial installation but as a strategic infrastructure oriented toward the material resolution of a historical environmental liability.

Its design integrates within a single operational architecture:

- Irreversible structural transformation of the material.
- Hermetic safety by design.
- Integrated environmental control and continuous monitoring.

- Structurally incorporated energy management.
- Modular scalability adaptable to different territorial realities.

This combination transforms the infrastructure into a replicable model within compatible industrial environments, capable of replacing an indefinite storage-based management scheme with a structurally resolutive intervention model.

The infrastructure ceases to operate under a logic of prolonged containment and becomes an industrial node for structural risk transformation.

Integrated into the productive fabric, the model aligns with principles of territorial sustainability and intergenerational responsibility.
Thus, AMIANTOP does not merely treat waste but redefines the role of industrial infrastructure in the management of accumulative environmental liabilities, shifting the focus from risk administration to its definitive material elimination.

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7 - RESULTS AND IMPACTS

7.1 Public Health Impact

The structural elimination of asbestos through irreversible mineral transformation entails the definitive disappearance of the physical basis of risk associated with future exposure.

Unlike the indefinite storage model, in which hazardous properties remain latent, the industrial treatment applied in AMIANTOP eliminates the fibrous morphology responsible for health risk.

This change implies:

- Structural long-term risk reduction.
- Decreased dependence on intergenerational monitoring.
- Greater long-term public health stability.

The impact is not limited to the short operational term but modifies the nature of the problem at its material foundation.
This approach shifts risk management from prolonged monitoring toward material elimination at source.

The irreversible elimination of risk redefines asbestos management as a structural preventive public health policy.

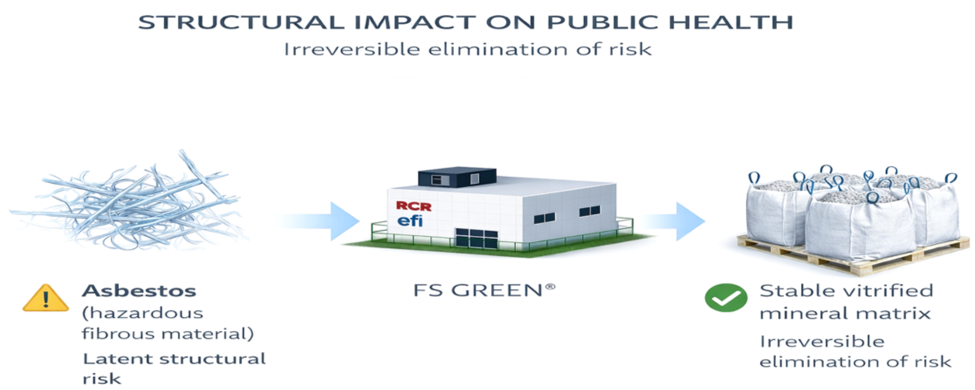

Figure 15. Structural public health impact derived from irreversible elimination of asbestos-related risk through the AMIANTOP model.

7.2 Environmental Impact

The applied model replaces the logic of confinement with a logic of transformation.

This implies:

- Progressive elimination of environmental liabilities associated with prolonged storage.
- Reduced dependence on specialized landfills.
- Decreased long-term territorial pressure.

Environmental impact extends beyond the immediate operational phase and projects across the entire waste management cycle.

7.3 Climate Impact

Replacing the indefinite storage model with an integrated industrial transformation scheme allows significant reduction of emissions associated with the traditional management cycle.

Logistical optimization, elimination of repeated transport and storage cycles, and internal energy integration contribute to a structural reduction of emissions linked to the conventional management model.

7.4 Industrial Impact and Circular Economy

Structural transformation of asbestos enables:

- Definitive elimination of its physical hazardous properties.
- Recovery of stable mineral fractions:

- Magnesium oxide ($MgO \geq 90\%$)
- Silicon dioxide ($SiO_2 \geq 90\%$)
- Combined mineral fraction

Valorisation of stabilized mineral fractions introduces a structural circular economy model in which an environmental liability is transformed into a technical resource integrable into existing production processes, reducing extraction of natural raw materials.

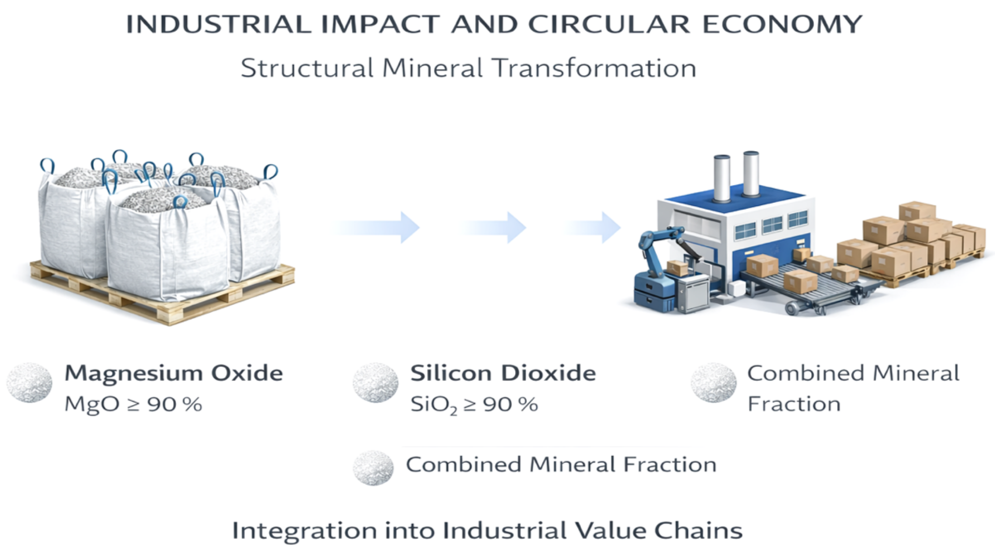

Figure 16. Industrial integration and circular economy derived from structural mineral transformation of the treated material.

Potential Applications of Mineral Fractions

The fractions obtained after transformation present physico-chemical stability and suitability for integration into existing industrial value chains.

Depending on composition and purity level:

- **Silicon dioxide ($SiO_2 \geq 90\%$)** may be used in applications related to the cement, ceramic, glass, and refractory industries.

- **Magnesium oxide ($MgO \geq 90\%$)** presents applications in refractory industries, special cements, fire-resistant materials, and technical construction solutions.

- The **combined mineral fraction** may be destined for use as technical aggregate or stabilized mineral material in industrial and infrastructure applications.

Incorporation of these fractions into existing production processes reduces natural raw material extraction, contributing to a coherent and structurally integrated industrial valorisation model.

7.5 Structural Economic Impact

Although the primary objective of the project is definitive risk elimination, the applied model presents structural economic implications:

- Reduction of costs associated with indefinite storage.
- Decrease in long-term maintenance obligations.
- Territorial optimization of infrastructure.

Economic impact is presented as a systemic consequence of structural liability elimination, not as the primary justification of the project.

7.6 Territorial Impact

Deployment of an industrial transformation infrastructure enables:

- Integration within compatible industrial environments.
- Reduced dependence on specialized landfills.
- Adaptation to different territorial contexts through modular scalability.

The proposed infrastructure does not function as a punctual solution but as a replicable industrial tool within compatible territorial frameworks, contributing to strategic planning for environmental liability management.

Figure 17. Territorial impact of the AMIANTOP model through progressive elimination of environmental liabilities associated with indefinite storage.

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8 - INDUSTRIAL PROJECTION AND SCALABILITY

AMIANTOP has been conceived not as an isolated installation, but as a replicable industrial infrastructure oriented toward the structural elimination of historical environmental liabilities.

Its technical architecture enables the asbestos problem to be addressed from a systemic, scalable, and territorially adaptable perspective, while maintaining the invariant physical principle of irreversible material transformation.

8.1 Structural Technological Platform

The technological core developed by EFI Ecotech Group is based on a stable principle:

- Irreversible physical transformation of the waste.
- Hermetic process architecture.
- Internal energy integration.
- Industrial valorisation of resulting mineral fractions.
- This core does not depend on specific territorial variables, allowing deployment in different compatible industrial environments without altering its technical coherence.

The model can therefore be considered a structural technological platform rather than a punctual solution.

8.2 Scalability Through Operational Modules

The industrial architecture allows configuration of the system at different capacities while maintaining:

- The fully integrated hermetic design.
- Automated control and continuous monitoring.
- Thermal and operational stability of the process.
- The structural principle of risk elimination.

Indicative configurations:

- 9,8 t/day → Base territorial deployment plant.
- 30 t/day → Regional scale.
- 90 t/day → Supra-regional scale or national programs.

Capacity expansion does not alter the technological foundation but adapts its dimension to the magnitude of the existing territorial liability.

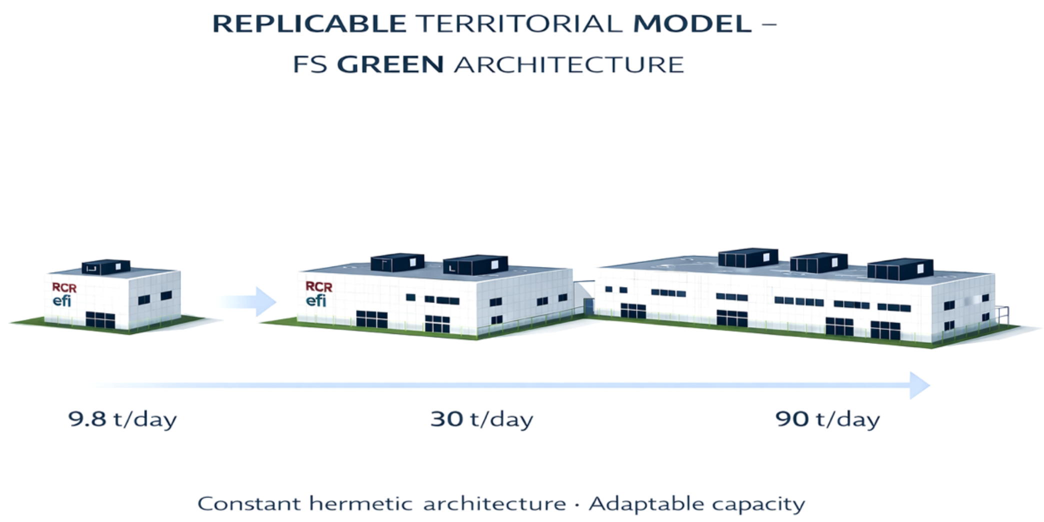

Figure 18. Replicable territorial model of AMIANTOP infrastructure in modular configuration adaptable to different industrial environments.

8.3 Integration into Public Strategies for Progressive Elimination

The model enables structuring of territorial programs for progressive asbestos elimination based on:

- Structural transformation instead of storage.
- Progressive reduction of dependence on specialized landfills.
- Elimination of intergenerational risk.
- Energy integration and logistical optimization.

In this regard, AMIANTOP aligns with:

- European ecological transition strategies.
- Policies aimed at reducing historical environmental liabilities.
- National asbestos removal plans.
- Principles of structural circular economy.

It does not introduce new long-term structural burdens but reduces accumulated liabilities.

8.4 Infrastructure as a Strategic Territorial Asset

AMIANTOP is not merely a treatment facility but a strategic industrial infrastructure with a triple dimension:

1. Irreversible physical elimination of risk.
2. Integrated energy production.
3. Generation of valorisable mineral materials.
4.

This approach transforms a defensive management model into a structural industrial resolution model.

The infrastructure ceases to be a confinement center and becomes an industrial asset for territorial transformation.

8.5 European Projection and Replicability

The asbestos problem presents common characteristics across multiple Member States:

- Widespread presence in buildings and infrastructure.
- Historical dependence on the landfill model.
- Generation of accumulative environmental liabilities.

The modular replicability of the model allows:

- Adaptation to different regulatory frameworks.
- Progressive deployment by regions.
- Integration into existing industrial ecosystems.
- Coordination with decarbonization strategies.

AMIANTOP therefore constitutes a technological foundation suitable for phased deployment across different European territories while maintaining technical, environmental, and regulatory coherence.

8.6 AMIANTOP as an Instrument of Environmental Industrial Policy

AMIANTOP transcends the condition of a technical infrastructure to configure itself as an **operational instrument of environmental industrial policy,** oriented toward structural resolution of a historical liability of territorial and European scope.

The model enables a transition from a management scheme based on indefinite storage toward an industrial system of irreversible physical risk elimination, aligned with principles of structural sustainability and intergenerational responsibility.

From this perspective, implementation of the model may contribute to:

- Effective execution of public plans for progressive asbestos removal.
- Structural reduction of accumulated environmental liabilities.
- Decrease in territorial pressure associated with specialized landfills.
- Integration of industrial infrastructure within ecological transition strategies.
- Generation of coherence between environmental, industrial, and energy policy.

AMIANTOP does not propose an incremental improvement of the existing model, but a change in logic:

- From prolonged containment to irreversible material transformation.

In this sense, the infrastructure may be considered a vector of:

- Preventive public health policy.
- Policy for elimination of historical environmental liabilities.
- Sustainable industrial modernization policy.
- Territorial policy oriented toward reduction of intergenerational burdens.

The structural approach allows replacement of indefinite monitoring obligations with a material resolution model, contributing to more stable and technically grounded environmental planning.

In doing so, AMIANTOP positions itself as an industrial tool aligned with European strategic objectives of ecological transition, structural circular economy, and progressive decarbonization, without generating new future environmental burdens.

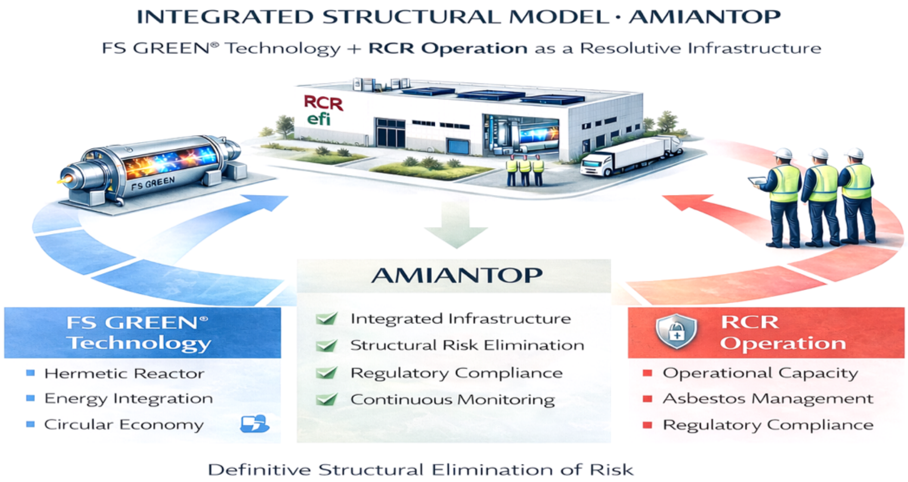

Figure 19. AMIANTOP as an instrument of environmental industrial policy, integrated into public planning and aligned with the European strategic framework for ecological transition.

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9 - TECHNOLOGICAL CONVERGENCE AND OPERATIONAL ROBUSTNESS

9.1 Integration of Technological and Industrial Capabilities

AMIANTOP is developed through the convergence between the technological capacity of EFI Ecotech Group, responsible for the development of FS Green® technology, and the operational experience of RCR in the management of asbestos-containing materials within regulated environments. This integration of technological knowledge and industrial implementation constitutes the structural foundation of the project.

The technology provides:

- Irreversible structural transformation of the material.
- Hermetic process architecture.
- Energy integration.
- Valorisation of stabilized mineral fractions.

Operational experience provides:

- Real management of asbestos-containing materials.
- Practical knowledge of safety protocols.
- Continuous interaction with regulatory frameworks.
- Application of certified procedures.

The integration of both domains eliminates the traditional fragmentation of the removal–transport–landfill model and configures a coherent and structured industrial solution.

The coordinated participation of EFI Ecotech Group and RCR enables integration of technological development, operational execution, and regulatory adaptation within a single coherent industrial framework, reinforcing the technical and administrative viability of the model.

Figure 20. Technological and industrial convergence of the AMIANTOP model: FS GREEN® technology, RCR operational capacity, and integrated infrastructure.

9.2 Operational Robustness in Regulated Environments

The AMIANTOP model is not conceived as an experimental solution, but as infrastructure designed to operate within established regulatory frameworks.

Accumulated experience in removal operations and controlled management of asbestos-containing materials enables:

- Precise identification of operational risks.
- Systematic application of safety protocols.
- Documentary management and traceability.
- Structured interaction with competent authorities.

Industrial operation is supported by organizational and management systems certified in accordance with applicable international standards in quality, environmental management, and occupational safety.

This framework provides stability, predictability, and coherence in the implementation of the model.

9.3 Technical Governance of the Project

AMIANTOP is structured under a defined technical governance scheme integrating:

- Technological coordination.
- Operational supervision.
- Control of critical parameters.
- Digital recording and process traceability.

Technical governance ensures:

- Reproducibility of the model.
- Coherence between design and implementation.
- Continuous supervision of industrial performance.
- Capacity for technical and regulatory auditing.

This approach prevents dissociation between conceptual design and operational reality, reinforcing system reliability.

The model incorporates a clearly defined structure of technical responsibility, with differentiated roles and hierarchical supervision, strengthening operational stability.

9.4 Real Implementation Capacity

The project is supported by existing industrial capabilities and experience in execution of complex technical projects.

Implementation is conceived under criteria of:

- Structured planning.
- Territorial compatibility.
- Integration with existing industrial infrastructure.
- Progressive administrative coordination.

The combination of validated technology, operational experience, and organizational structure enables the implementation phase to be approached from a solid and technically grounded foundation.

9.5 Elimination of Traditional Model Fragmentation

The traditional asbestos management model involves multiple disconnected phases:

- Removal.
- Transport.
- Confinement.
- Indefinite monitoring.

AMIANTOP integrates these phases within a single coherent industrial scheme in which the material is not transferred as latent risk but structurally transformed within controlled infrastructure.

This integration reduces:

- Operational fragmentation.
- Prolonged dependence on landfills.
- Multiplication of logistical risks.
- Intergenerational burdens associated with permanent storage.

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10 - EUROPEAN STRATEGIC FRAMEWORK AND PUBLIC POLICY

10.1 From Waste Management to Structural Elimination of the Liability

Traditional asbestos management in Europe has been based on removal and confinement of the material in specialized landfills, configuring a model of indefinite risk storage.

AMIANTOP introduces a structural shift in this logic by replacing prolonged containment with irreversible physical transformation of the material, eliminating the structural basis of its hazardous properties.

This approach enables a transition from deferred management to a model of definitive industrial resolution, aligned with principles of intergenerational responsibility and territorial stability.

10.2 Alignment with the European Ecological Transition

The European Union has established a strategic framework oriented toward:

- Reduction of historical environmental liabilities.
- Progressive decarbonization of the economy.
- Promotion of a structural circular economy.
- Modernization of industrial infrastructure.

The AMIANTOP model integrates coherently within this context by:

- Reducing dependence on specialized landfills.
- Integrating mineral and energy valorisation.
- Decreasing cumulative impacts associated with indefinite storage.
- Contributing to structural reduction of indirect emissions.

The coherence is not declarative, but functional.

10.3 Elimination of Intergenerational Burdens

Indefinite storage of asbestos-containing materials transfers monitoring and maintenance obligations to future generations.

Irreversible structural transformation of the material eliminates this transfer of responsibility, replacing a model of permanent monitoring with a model of material risk resolution.

In this regard, AMIANTOP contributes to:

- Reduction of accumulated environmental liabilities.
- Stabilization of territorial planning.
- Minimization of long-term uncertainty.
- Improvement of regulatory predictability.

10.4 Operational Instrument of Public Policy

AMIANTOP may act as a technical implementation tool for:

- Public programs for progressive asbestos removal.
- Regional strategies for elimination of historical liabilities.
- National plans for sustainable industrial modernization.
- Energy transition initiatives with industrial integration.

The infrastructure does not introduce new structural burdens but transforms a historical environmental liability into a controlled and stable industrial process.

10.5 Regulatory Coherence and Administrative Viability

The model has been conceived from its design phase with integration of the applicable regulatory framework concerning:

- Hazardous waste management.
- Industrial safety.
- Environmental protection.
- Industrial emissions.

Regulatory compatibility is addressed structurally, avoiding the need for subsequent adaptations that could compromise the system's technical coherence.

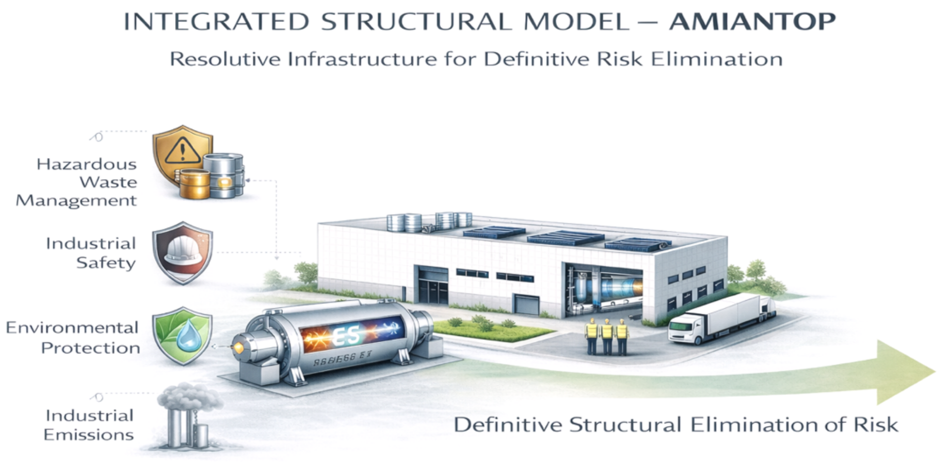

Figure 21. Integrated structural model of AMIANTOP as infrastructure for definitive risk elimination.

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11 - STRATEGIC MANIFESTO

Asbestos is not merely a residue inherited from Europe's industrial past. It is a structural liability that affects territory, public health, and intergenerational responsibility.

For decades, the dominant approach has been deferred management: removal, transport, and controlled storage. An administratively ordered model, yet materially inconclusive.

The risk does not disappear.

- It is displaced.
- It is encapsulated.
- It is postponed.

Technological evolution and industrial maturity now introduce a different scenario.

When real capacity exists to irreversibly transform the physical nature of a hazardous material, the conceptual framework changes.

AMIANTOP represents that transition.

Not through rhetoric, but through the convergence of technological knowledge, operational capability, and industrial infrastructure.

FS GREEN® technology, developed by EFI Ecotech Group, provides the scientific basis to structurally alter the mineral configuration of asbestos, neutralizing its intrinsic hazardous properties.

The industrial capability of RCR ensures its application under real conditions, with demanding technical standards and operational coherence.

Integration between technology and industrial capacity transforms technical possibility into functional infrastructure.

And that distinction is decisive.

AMIANTOP does not optimize the previous model.
It represents a conceptual advancement beyond it.

It replaces the logic of indefinite storage with the logic of irreversible transformation.

It introduces a structural principle:

Historical environmental liabilities should not be administered indefinitely when they can be definitively resolved.
This approach is not sectoral.
It is systemic.

It impacts public health by eliminating a potential source of future exposure.
It impacts environmental policy by reducing the need for intergenerational storage.
It impacts industrial policy by integrating advanced technology into the resolution of historical legacies.

Within the context of the European ecological transition and industrial strategic autonomy, management of accumulated liabilities ceases to be solely a regulatory matter.

It becomes a matter of infrastructure.
The transition does not consist only in preventing new impacts.

It also consists in structurally closing inherited ones.

The technology exists.
Industrial capacity exists.
The European regulatory framework is evolving in that direction.

The time of deferred management gives way, naturally, to resolutive models.

AMIANTOP represents that evolution.

A model in which historical liabilities are not transferred but transformed.
In which risk is not administered indefinitely but structurally eliminated.
In which industrial infrastructure assumes its role in the definitive resolution of past legacies.
This is not a future hypothesis.
It is an already integrated technical and industrial capacity.

As such, it redefines the horizon from which Europe can address the asbestos legacy.
AMIANTOP does not prolong risk management.
It establishes the conditions for its structural elimination.

Definitive industrial elimination of asbestos.

Irreversible mineral transformation technology.

FS GREEN 10-08A

La Rioja – España

Febrero 2026