

COURTESY TRANSLATION OF THE WITNESS STATEMENT
OF RENE ALTAMIRANO PÉREZ

1. My name is Rene Altamirano Pérez. From September 12, 1985 to January 31, 1994, I held the position of General Director for Prevention and Control of Environmental Pollution in the former Secretariat of Urban Development and Ecology (SEDUE). I later established *Asesores Ambientales Asociados, S.A. de C.V.*, an environmental consulting company. I am currently living in Argentina, where I work as a consultant for the Argentinean Government on environmental matters, a position that I will hold for approximately two more years.

2. As General Director, I participated in the initial authorization process for the La Pedrera site, when it was owned by Mexican investors. This is how I came to learn about some of the events that gave rise to this controversy. Given that my participation goes as far back as 1990, I have refreshed my memory by looking at some official documents. I will refer to those documents in order to assist the Tribunal in understanding the events that transpired. Each is attached as an exhibit to my witness statement.

3. I was the federal public servant who, in accordance with the powers vested in me through Article 24, paragraph I, IV, VIII, IX and XIV of the Internal Regulations of the Secretariat for Urban Development and Ecology, issued COTERIN's permit to construct a temporary transfer station at La Pedrera.

4. To the best of my recollection, Mr. Salvador Aldrett and I met for the first time around ten years ago. At that time, the federal environmental department was of the opinion that the Mexquitic landfill operated by Mr. Aldrett had reached the end of its useful life and due to technical considerations decided to close it. Mr. Aldrett informed me that he had an important group of clients who were accustomed to complying with the provisions of the new federal law on the subject matter. He wished to continue to provide such services to these clients and Mr. Aldrett requested that the federal authority, support him in establishing a new hazardous waste landfill at the site that he owned, known as La Pedrera.

5. The La Pedrera site was an important issue for SEDUE. Along with another site in Nuevo Leon State, it was among the first sites to be the subject of an application under the 1988 law and, naturally, was one of our first experiences with the entire procedure. We proceeded cautiously due to the implications of the project. In the first few months of 1990, Mr. Aldrett submitted the La Pedrera site for consideration by my office. On August 24, 1990, after establishing that the general characteristics of the subsoil met the environmental regulations in effect, I authorized him to continue with the procedures to obtain the permits. The second step required the preparation of an Executive Report and an Environmental Impact Statement on the 814 hectares which comprised the La Pedrera

site.

6. The approval process for a hazardous waste landfill site must proceed in stages. It is a delicate process that requires that a series of highly specialized studies and tests be carried out, which must be analyzed by the competent authority in order to approve the construction and operation plans. This is only one of a number of permits that must be obtained from the competent authorities. Since it takes considerable time, Mr. Aldrett asked us, on many different occasions, to consider the possibility of allowing him to continue to receive waste for its temporary storage, because he had many clients for whom he had provided this service for numerous years in Mexquitic and, at that time, there were no other options enabling him to comply with the law.

7. It must be pointed out that these clients continued their production activities, which meant that they continued to generate waste. In other words, with or without a landfill, waste was still being generated daily. In this case, we found ourselves with a group of waste producers who were accustomed to complying with the applicable regulations for waste disposal.

8. As General Director, my responsibility was to find solutions to the problems presented to us, and I have no doubt that the disposal of hazardous waste was, and still is, a major environmental challenge facing Mexico.

9. Therefore, after reviewing the problem, I concluded that the legislation and the powers that it vested in me, in particular Article 24, paragraphs I, IV, VIII, IX and XIV of the Internal Regulations of SEDUE, enabled me to provide a technical and environmentally secure solution for the temporary storage of the waste. This technical solution was deemed a Transfer Station. Thus, on October 31, 1990, within the scope of my responsibilities, I authorized COTERIN to construct a transfer station, in accordance with the technical requirements that were conditions to such authorization. A photocopy of the October 31, 1990 permit is attached as Exhibit 1.

10. Unfortunately, some time after receiving the authorization to build the transfer station, and while the Environmental Impact Statement for the establishment of the controlled landfill was being prepared along with the detailed technical studies, COTERIN began to receive hazardous waste without constructing the authorized transfer station, which basically consisted of an environmentally safe storehouse. The wastes received were simply placed on or in the land, without any neutralization or treatment. COTERIN did not have any authorization to receive the waste under these conditions.

11. In the summer 1991, after receiving complaints from the local community, the office of the President of the Republic requested that SEDUE provide information on the site's situation. A report was prepared for the office of the President dated August 5, 1991. A photocopy of this report is included as Exhibit 2.

12. On August 19, 1991, SEDUE ordered that COTERIN, among other things, build the transfer station in two weeks, in accordance with the requirements previously established. Similarly, after an inspection carried out the following day, SEDUE granted the company 48 hours to submit a remediation plan for the violations detected during the last on-site inspection. Photocopies of these documents are included as Exhibits 3 and 4, respectively. By the end of August, we were very concerned because there was little progress in the construction of the transfer station and, nevertheless, it appeared that COTERIN was continuing to receive wastes.

13. One month later, in response to an allegation by the Municipal President of Guadalcázar that a very large shipment of hazardous waste was being unloaded at the site, an inspection of the La Pedrera site was carried out by SEDUE-SLP on the night of September 19, 1991 lasting until dawn the next day. SEDUE-SLP found that COTERIN had, indeed, continued to receive waste. The amount of waste found was approximately 800 tons. The company was ordered to return the waste immediately. A photocopy of the on-site inspection is included as Exhibit 5.

14. On September 21, 1991, two SEDUE-SLP inspectors were detained by people from the local community as they left the landfill after having conducted an inspection. The protesters demanded SEDUE's intervention to shut down the site and held the inspectors in their custody for approximately eight hours.

15. Three days later, the Auditor General of SEDUE instructed me to apply the corresponding sanctions against the company, given that the transfer station situation was in violation of what was required by the inspection report dated September 19, 1991. A photocopy of the Auditor General's letter is attached as Exhibit 6.

16. I therefore ordered another inspection of the company on September 25, 1991. This visit revealed that the company had not complied with the September 19, 1991 order to return the waste previously found. Based on this violation and the repeated non-compliance by the company, I ordered its complete and temporary closure, as a security measure. Closure seals were placed on the site, only allowing access to vehicles carrying out the order to return the waste to its place of origin and to undertake on-site maintenance and security. Copy of the closure order is attached as Exhibit 7.

17. Later, we received several requests by the company to lift the closure. SEDUE rejected all these petitions. Photocopies of SEDUE's letters to COTERIN are attached as Exhibit 8.

18. From that time on, the federal department had to deal with a very difficult situation. Around 55,000 containers of dangerous waste (approximately 20,500 tons) had been deposited on the site, be it simply placed on top or partially buried in the land without the appropriate treatment or any safety measures at all.

19. The situation was complex. On the one hand, one of the department's objectives was the installation of certain number of controlled hazardous waste landfills in different sites throughout the Mexican Republic in order to meet the needs of the country in this area. Further, the results of the studies requested from COTERIN showed that the La Pedrera site was suitable for this purpose. On the other hand, COTERIN had created an environmental hazard by receiving unauthorized dangerous waste, significantly damaging its credibility as the operator. This resulted in the distrust of COTERIN in the local community and, moreover, had damaged the credibility of the federal environmental authorities.

20. Eventually, we decided that it was necessary to continue to work on the site for two principle reasons. First, we believed that the geology of the site made it suitable for the installment of a controlled hazardous waste landfill (this was indicated by the preliminary studies presented by the company, although a final opinion could not be issued until the review of the Environmental Impact Statement was concluded).

21. Second, the Interior Regulation of the Secretariat for Social Development sought to encourage the establishment of this type of service. The Tribunal should know that, at the time, there were no more applications for the establishment of a hazardous waste landfill, the country needed these services, and we were obligated by law to analyze the proposal on the terms in which it was submitted and to approve it, if it complied with the necessary requirements. This explains why the environmental impact authorization and the permit to establish a hazardous waste landfill were granted to COTERIN on January 27, and August 10 of 1993, respectively. In other words, we decided to approach the problem as two separate components. First, the technical aspects of the land and the eventual approval of the site, and, second, the violation of the regulations in force.

22. I also want to emphasize that this was the first hazardous waste landfill permitted under the new law. The first commercial facility was Mexquitic, but that was long before the 1988 *Ley General del Equilibrio Ecológico y la Protección al Ambiente*, the Regulations of the *Ley en Materia de Desechos Peligrosos* and the Regulations of the *Ley en Materia de Impacto Ambiental*. Thus, we permitted La Pedrera to manage a small amount of hazardous waste. The respective authorizations of January 27, 1993 and the August 10, 1993 established that the landfill was authorized to receive approximately 36,000 tons a year. We first wanted to see how the operator worked before increasing the landfill's capacity.

23. To the best of my recollection, I met the Metalclad representatives at the beginning of 1993. I understand from the information submitted by Mr. Kesler in his witness statement that they were already involved in 1992, in a waste incinerator project in San Luis Potosí. I did not know this at that time. I thought the company was only interested in acquiring La Pedrera. I knew of the Santa María del Río project, but I did not know that Metalclad was involved in it. On February 25, 1993, my office approved the Santa María del Río Environmental Impact Statement, but to the best of my recollection, it was abandoned thereafter. The project was promoted by Mexican investors and consisted of a center for hazardous and non-hazardous hydrometallurgic treatment process and

incineration, but did not include a hazardous waste landfill, only a landfill for the ashes produced by the incinerator.

24. I think that the man I met on that occasion was Mr. Daniel Neveau. What I recall is that he visited Mexico frequently. I believe I met Mr. Kesler on only one occasion. My conversation with him was very general.

25. I remember very clearly that Mr. Neveau spoke about Metalclad's experience in the field of industrial waste in the United States and, I believe, in Canada. I did not ask anything more about the company's previous experience, as this was not my responsibility. SEDUE does not undertake exhaustive reviews of investor's representations; it is assumed that such representations are made in good faith. As the individual responsible for granting the permits, my responsibility was limited to assuring myself that the technical aspects of the project and the specific conditions of the site were adequate.

26. I have two additional observations with respect to Mr. Neveau. First, he seemed to be an intelligent man. However, it was also clear that he did not have, nor pretended to have, technical experience in the field (I assumed technical personnel assisted him). Second, he did not speak Spanish, and although I speak English, I always discussed the technical matters in Spanish in order to avoid or to minimize the risk of possible misunderstandings. I remember that, to my great surprise, in September 1993, Mr. Humberto Rodarte Ramón quit his job at SEDUE and became a corporate representative for Metalclad. I do not recall his official title, but my impression was that he was in charge of facilitating and accelerating the granting of permits for the La Pedrera project. Once he joined Metalclad, he facilitated the communications and translation during our discussions.

27. I direct the Tribunal's attention to the matters concerning the language in which we communicated because I am absolutely certain that I discussed the issues regarding federal jurisdiction with the Metalclad representatives. I remember that I specifically said that the authorization granted only referred to the approval of the conditions of the site and of the technology planned to be used there. This authorization did not mean that the Federal Government could approve land usage, because that was an issue concerning the State and the Municipality. I have no doubt that I made this very clear in my discussion with the Metalclad's representatives.

28. I also remember that Mr. Rodarte Ramón gave the impression that he believed that they would prevail over the state and municipal concerns. He thought the influence of the Federal Government could tilt the decision in favor of the project.

29. However, I was always careful in my position as General Director to ensure that the powers conferred on the federal authority to grant permits were fully exercised, but never invading the local government's sphere of jurisdiction. The Tribunal should know that in Mexico the environmental laws with broad scope are relatively new, and that many of the matters relating to the division of jurisdiction have not yet been resolved. For example, in 1983 the Constitution was amended to give more powers to the Municipal Governments. These powers have not been fully exercised, but are recognized by the

Constitution. Therefore, as a federal public servant, it is clear I had wide powers, though not absolute nor exhaustive. As shown in Exhibit 9 attached to my statement, when the departmental technical group approved the application, I authorized COTERIN's Environmental Impact Statement and the Risk Study on January 27, 1993, and granted the federal permit for environmental impact, I specifically stated the following:

"TENTH.- This authorization is issued without prejudice to the holder's need to apply for and obtain other authorizations, concessions, licenses, permits or such, that are necessary to conduct the works result of this authorization, or its operation or other stage of the project, pursuant to other Laws and Regulations that shall be applied by the Secretariat for Social Development and/or by other federal, state or municipal authorities. [emphasis added]"

This meant that the authorization could not be considered as an authorization satisfying all legal requirements the company had to meet in order to establish a hazardous waste landfill. In other words, it meant that this authorization did not superseded other federal, state or municipal authorizations the applicant, in addition, needed to obtain to construct and operate the hazardous waste landfill.

30. This permitting process is similar to those in the United States where if the county does not grant a land use permit for a hazardous waste landfill, the site cannot be authorized. For example, I know of at least six cases in the United States where the local authority has prevented very large investments. As Metalclad had held themselves out to be professionals in the area of hazardous waste management, they ought to have been aware of this risk. Especially, given that they were planning to invest heavily in Mexico.

31. I have reviewed Metalclad's translation of the Spanish version of the permit. Although my English is not perfect, it seems to me that Metalclad's translation of the above mentioned paragraph is inadequate. Metalclad's translation states "*This authorization is granted without detriment if the holder applies for and obtains other authorizations, concessions, licenses, permissions or such, that are required for the realization of the work...*" while the permit actually states that "*This authorization is issued without prejudice to the holder's need to apply for and obtain other authorizations, concessions, licenses, permits or such, that are necessary to conduct the works...*" A photocopy of the noted paragraph in the English translation, provided by Metalclad in this matter, is included as Exhibit 10.

32. I want to refer to the scope of the authorizations granted to COTERIN by the National Institute of Ecology (INE) in 1993 and to draw the Tribunal's attention to the text of such authorizations and to the legal basis for it being granted. Metalclad refers to those authorizations as final construction and operation permits. However, those permits are not legally construction nor operation permits, and are, instead, authorizations prior to the construction and operation of a controlled hazardous wastes landfill. That is why, for example, the federal permits necessary for the establishment of a hazardous waste landfill

and the state permits for land use, govern different regulatory jurisdictions and therefore are not in opposition; one does not prejudice the other.

33. On January 27, 1993, my Department granted COTERIN the authorization with respect to environmental impact matters. This authorization means that the Environmental Impact Statement submitted by the company was properly prepared and demonstrated that the environmental impact could be prevented or mitigated as set out in the studies submitted. In other words, that the project was in compliance with the technical environmental regulations existing at that time and that it could operate in the environmental context in which the construction and operation of the landfill would be carried out. The *Ley General del Equilibrio Ecológico* in force at that time. Article 29 set out that:

“The onus is on the Federal Government, by means of the Secretariat, to evaluate the environmental impact... when related to the following matters: (VI) Installations for the treatment of hazardous wastes, as well as radioactive wastes...”

34. The Regulations of Environmental Impact Law which supplement the provisions of the Law (Article 5 of the Regulations reproduces Article 29 of the Law) set out the following in Article 6 and 20:

(Article 6) In order to obtain the authorization referred to in Article 5 of the Regulations, the interested party prior to carrying out the works or activity referred to, shall submit an environmental impact statement to the Secretariat. In the case of works or activities considered to be highly dangerous, in addition to what is mentioned in the above paragraph, should submit to the Secretariat a Risk Study in accordance with the terms set out by the Regulations which govern those activities.

(Article 20) Once the environmental impact statement of the work or activity referred to is evaluated, submitted in the corresponding manner, the Secretariat will formulate and communicate to the interested parties, the corresponding decision, in which it might (I) Authorize the performance of the work or activity in the terms and conditions mentioned in the corresponding Statement...

35. Thus, the January 27, 1993 authorization states:

I refer to the project named “Construction and Operation of a Hazardous Wastes Controlled Landfill in the rural site of La Pedrera, Municipality of Guadalcázar, San Luis Potosí,” represented by the company *Confinamiento Técnico de Residuos Industriales S.A. de C.V.* (COTERIN, S.A. de C.V.) located in the Municipality of

Guadalcázar, San Luis Potosí, which submitted to the then General Directorate for Regulation and Ecological Standards, an Environmental Impact Statement in accordance with the specific requirements, Risk Study with the required Detailed Risk Analysis (A.D.R.) and additional information, with the objective of obtaining the environmental impact authorization.

With regard to this matter, I inform you that, having analyzed the information submitted, this office considers that the project, as presented, is suitable subject to the following:

FIRST.- The present authorization grants the company, COTERIN, S.A. de C.V., the right to carry out within the stated terms, the works for the construction and operation of a Technical Hazardous Waste Landfill...(emphasis added)

36. The paragraphs cited from the Law, the Regulations and the authorization dated January 27, 1993, along with clause ten of this authorization, quoted above, clearly shows that a construction permit was never granted, but, instead, what was granted was an authorization in relation to the requirement regarding environmental impact as shown by the Mexican legislation.

37. Within the same context, the authorization for the establishment of a hazardous waste landfill was granted on August 10, 1993. The General Law of Ecological Equilibrium and Environmental Protection, in force at that time, provides in Article 151, that:

The installation and operation of systems for the collection, storage, transport, lodging, reuse, treatment, recycling, incineration and final disposal of hazardous wastes shall require the previous authorization of the Secretariat.

38. The authorization granted states:

Regarding application No. 011-MRP/93 and in order to comply with Articles 151 of the Ley General del Equilibrio Ecológico, clause 10 of the Regulations regarding Hazardous Wastes; Article 36, numeral XVII of the Internal Regulations of the Secretariat for Social Development; and Article 12 numeral XV of the Agreement regulating the Organization and Internal Functioning of the National Environmental Institute and of the Procuraduría Federal de Protección al Ambiente (PROFEPA), AUTHORIZATION is granted. (emphasis added)

39. As is observed, the authorization clearly states that it is made based on Article 151 cited above. Neither the law, nor the authorization provide that it is an operating permit. The legislation is clear when it provides that it is an authorization prior to the

establishment and operation of a hazardous waste landfill. In other words, any person who seeks to establish and operate a hazardous waste landfill must have previously obtained both federal authorizations, which COTERIN, in fact, obtained in January 27 and August 10, 1993. However, the legislation does not provide that only those authorizations are needed or that those authorizations are sufficient to construct and operate such a facility without the need to comply with the applicable state and municipal legislation. This regulation is set out in the tenth clause of the authorization for environmental impact. It is a principle that Metalclad's lawyers should have been completely aware of.

40. Metalclad has referred to a meeting that my superior Mr. Reyes Luján and I had with Governor Sánchez Unzueta. I remember this meeting and I wish to make the following comments. First, it is true that Mr. Reyes Luján offered to meet with the Governor in order to explain to him the benefits of having a hazardous waste site in San Luis Potosí. He firmly believed that Mexico should have more hazardous waste landfills and, with this type of project, it was common for him to travel to meet with the Governor of a State in which the project planned to be developed in, to try to personally convince him of its benefits. In this way, his visit with Governor Sánchez Unzueta was not unusual.

41. Second, it was very clear to us, and it should also have been very clear to Metalclad, that obtaining the federal permit was not enough. Otherwise, why would my superior meet with the Governor to try to get his support? To ask him to violate the laws of his state?

42. Third, during the two meetings, the Governor was open to the project, but never expressly accepted it, nor did he offer his support. It was obvious that he was not convinced that there was local support for the project. Furthermore, his adviser, Dr. Pedro Medellín, was of the opinion that the La Pedrera project should not proceed.

43. Dr. Rodarte Ramón's witness statement reminded me of events that occurred after Mr. Reyes Luján and I met with the Governor and Dr. Medellín in 1993. When we finished the meeting, Mr. Rodarte Ramón was waiting for us outside of the Governor's office. Mr. Reyes Luján informed him of the meeting and told him that, in his opinion, there was progress, due to the fact that a technical meeting between the experts of SEDESOL and the State Government had been agreed to in order to determine how to proceed. However, Mr. Reyes Luján asked Dr. Rodarte Ramón not to make statements that could complicate the process. I remember that shortly thereafter, Metalclad informed the press that the project had been approved.

44. In my opinion, these types of actions complicated the federal-state relationship, as it damaged the direct relationship with the Governor, who, I believe, viewed them as unacceptable attempts to force him to side in favor of their project.

45. The La Pedrera project became very controversial for SEDUE, for Mr. Reyes Luján, and for me personally. In September of 1995, after having left office, Mr. Reyes Luján and I, among other officials, were the subject of a complaint filed by the Mexican Center for Environmental Law before the *Procuraduría General de la República*. The complaint referred mainly to actions of the officials who granted the permits to COTERIN in San Luis Potosí. Particularly, the complaint focused on the allegation that the permit to install a transfer station was granted in an irregular manner in that it did not require the completion of an Environmental Impact Statement. This led to a major investigation by the prosecuting attorney's office (*Ministerio Público*). I spent considerable time examining the file to defend both Mr. Reyes Luján's and my own actions. A photocopy of a document I submitted to the prosecutor's office in charge of the case (*ministerio público*) is attached as Exhibit 11. In this document, I maintained, and I still maintain, that we acted in complete accordance with the Law. The Law did not require an environmental impact statement for the authorization of a temporary hazardous waste storehouse, as is, instead, required for the authorization of a hazardous waste landfill. The latter of which we did, in fact, demand in due time, as I previously explained.

46. In the document that I filed with the prosecuting attorney's office, I stated that:

In 1991, as a delegated responsibility from the Secretary of the SEDUE, based on Article 24 numerals I, IV, VIII, XI and XIV of the Internal Regulations of the Secretariat for Urban Development and Environment (DOF 23/09/88), the then General Director for the Prevention and Control of Environmental Pollution authorized the construction of an environmentally secure hazardous waste storehouse; for this, he set out a series of technical requirements, which precisely provided that said construction would only allow for the temporary storage of waste and, therefore, the authorization is not related to the treatment, recycling and/or confining of industrial waste.

This storehouse was called a Transfer Station. It must be pointed out that presently the National Environmental Institute as the Environmental Authority, has enacted official Mexican Standards applicable for all the producers of infectious-contagious hazardous waste, providing that this waste be sheltered inside their own premises in the same manner that the undersigned demanded from COTERIN five years ago.

In accordance with the above mentioned, the authorization of the Transfer Station, which is nothing more than a temporary storage, did not require the submission of an Environmental Impact Statement to INE, because Article 29 of the *Ley General del Equilibrio Ecológico y Protección al Ambiente*, and Article 11 of its Hazardous Waste Regulation, do not provide, as a federal requirement, the need for such a statement to obtain the authorization for hazardous waste storage.

47. The complainant never provided any basis for its complaint and the prosecutor's office accepted our arguments. We were never prosecuted and the case was closed. I refer to this investigation in order to demonstrate to the Tribunal how the case was very politically charged.

48. I have reviewed the Memorial and the witnesses statements mentioning my specific participation in the matter, and I have the following comments. Metalclad asserts that Mr. Reyes Luján and I gave them assurances that the federal authorizations took precedence over the local permits, and that we would take care of the State issues. I deny both allegations. I am very surprised that a company that represented itself as an experienced investor now makes these allegations. As I have already explained, we clearly noted in the authorizations issued that they did not relieve the applicant from the other requirements of federal, state and municipal law. I personally told them to pay attention to the state land use requirements. In addition, I thought I was dealing with an established company seeking to invest in a foreign country, and I assumed that such an investor would have retained Mexican legal counsel that would know this basic principle of our federal system. In establishing a business, especially a highly regulated facility such as a hazardous waste landfill facility, requires multiple authorizations from different authorities.

49. In addition, at that time, Metalclad did not even behave as if they were confident of our alleged "assurances" that the federal authorization was enough or that we would take care of the State issues. I remember very well that before we granted the August 10, 1993 authorization, Mr. Neveau told me that they had received the written support of the Governor of San Luis Potosí for the La Pedrera project. They never showed me the letter mentioned, but it was clear that they knew it was not enough to only have the federal authorizations and the "assurances" of federal authorities for their project to succeed.

50. Regarding "taking care of state" issues, I was not in a position to offer or deliver upon such promise. I did not make it, and to the best of my recollection, Mr. Reyes Luján never did in my presence. Mr. Reyes Luján did offer to talk with the Governor, as he did, but he did not say he would take care of the State issues.

51. There were a series of factors at play that, in my opinion, explained why the project failed. The most important of them was the prior conduct of COTERIN. This made the task of finding the necessary support that much more difficult.

52. Second, there was local opposition to the project and it seemed to me that the Governor was not sure of how to respond to it. At that time, the opposition forces were well organized and the project was not a popular one to say the least.

53. Finally, I have no doubt that in addition to those factors, there was a bigger problem at the La Pedrera project, namely, a communication problem. We were never capable of explaining the situation in a simple and clear way. We were never able to

approach the people and tell them, "this is the situation, this is what we have been doing," and this occurred continually. I have no doubt there we lacked clear lines of communication between the technical experts and the local community.

54. I make this declaration with the intention of providing evidence that will assist this Tribunal in resolving the dispute. I am aware that I can be called to provide more evidence and to be cross-examined on the evidence that I present. I make this declaration with the promise to tell the truth and, in those areas where I have testified on matters which I did not witness directly, I declare that the information contained in my witness statement is in my understanding and to the best of my knowledge the most accurate and truthful information.

SIGNED IN THE ORIGINAL:

Rene Altamirano Pérez