

Application Forms

Environmental Permit Variation

West Newton A Wellsite

East Riding of Yorkshire

PEDL 183

December 2018



APPROVAL LIST

	Title	Name	Signature
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Application for an environmental permit Part A – About you



You will need to fill in this part A if you are applying for a new permit, applying to change an existing permit or surrender your permit, or want to transfer an existing permit to yourself. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

About you

1

- 1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2 Printed off and filled in by hand. Please write clearly in the answer spaces.

Note: if you believe including information on a public register would not be in the interests of national security you must

tick the box in section 4 of F1 or F3 and enclose a letter telling us that you have told the Secretary of State. We will not include the information in the public register unless directed otherwise.

It will take less than one hour to fill in this part of the application form.

Where you see the term 'document reference' on the form, give the document references and send the documents with the application form when you've completed it.

Contents

- 1 About you
- 2 Applications from an individual
- 3 Applications from an organisation of individuals
- 4 Applications from public bodies
- 5 Applications from companies
- 6 Your address
- 7 Contact details
- B How to contact us

Are you applying as an individual, an organisation of individuals (fo Liability Partnerships) or a public body?	r example, a partnership), a company (this includes Limited
An individual	☐ Now go to section 2
An organisation of individuals (for example, a partnership)	☐ Now go to section 3
A public body	☐ Now go to section 4
A registered company or other corporate body	☐ Now go to section 5
2 Applications from an individual	
2a Please give us the following details Name	
Title (Mr, Mrs, Miss and so on)	
First name	L
Last name	
Date of birth (DD/MM/YYYY)	
Now go to section 6	
3 Applications from an organisation of individuals	
3a Type of organisation For example, a charity, a partnership, a group of individuals or a club	
3b Details of the organisation	
If you are an organisation of individuals, please give the details of the main representative below. If relevant, provide details of other members (please include their title Mr, Mrs and so on) on a separate sheet and tell us the document reference you have given this sheet.	L

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3	Applications from an organisation of individuals, or	continued
Con	tact name	
Title	(Mr, Mrs, Miss and so on)	
First	name	
Last	name	
Date	e of birth (DD/MM/YYYY)	
Now	go to section 6	
4	Applications from public bodies	
4a For 6	Type of public body example, NHS trust, local authority, English county council	
4b	Name of the public body	
4c An o	Please give us the following details of the executive officer of the public body authorised to sign on your behalf	
Nam	ne	
Title	(Mr, Mrs, Miss and so on)	
First	name	
Last	name	
Posi	tion	
Now	go to section 6	
5	Applications from companies or corporate bodies	
5a	Name of the company	
5b	Company registration number	
Date	e of registration (DD/MM/YYYY)	
If yo the i	u are applying as a corporate organisation that is not a limited coreference you have given the document containing this evidence	ompany, please provide evidence of your status and tell us below .
Doc	ument reference	
Now	go to section 6	
	Please give details of the directors levant, provide details of other directors on a separate sheet and	tell us the reference you have given this sheet.
Doc	ument reference	
Deta	ails of directors	
Title	(Mr, Mrs, Miss and so on)	
First	name	
Last	name	
Date	e of birth (DD/MM/YYYY)	

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6 Your address

Now go to section 7

Your main (registered office) address For companies this is the address on record at Companies House. Contact name Title (Mr, Mrs, Miss and so on) First name Last name Address Postcode Contact numbers, including the area code Phone Fax Mobile **Email** For an organisation of individuals every partner needs to give us their details, including their title Mr, Mrs and so on. So, if necessary, continue on a separate sheet and tell us below the reference you have given the sheet. Document reference for the extra sheet 6b Main UK business address (if different from above) Contact name Title (Mr, Mrs, Miss and so on) First name Last name Address Postcode Contact numbers, including the area code Phone Fax Mobile **Email**

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7 Contact details

7a Who can we contact about your application? This can be someone acting as a consultant or an 'agent' for you.	
Contact name	
Title (Mr, Mrs, Miss and so on)	
First name	
Last name	
Address	
Postcode	
Contact numbers, including the area code	
Phone	L
Fax	L
Mobile	L
Email	L
	L
	L
7b Who can we contact about your operation (if different from Contact name	om question 7a)?
Title (Mr, Mrs, Miss and so on)	
First name	L
Last name	L
Address	
	L
	L
	L
Postcode	
Contact numbers, including the area code	
Phone	L
Fax	L
Mobile	L
Email	L
	L

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7 Contact details, continued	
7c Who can we contact about your billing or invoice? As in question 7a As in question 7b Please give details below if different from question 7a or 7b. Contact name	
Title (Mr, Mrs, Miss and so on)	
First name	
Last name	
Address	
Postcode	
Contact numbers, including the area code	
Phone	
Fax	
Mobile	
Email	

8 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, or you would like us to review a decision we have made, please let us know. More information on how to do this is available at: www.gov.uk/government/organisations/environment-agency/about/complaints-procedure

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

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(You don't have to answer this part of the form, but it will help us improve our forms if you do.)						
We want to make our forms easy to fill in and our guidance not comments you may have about this form or the guidance note	tes easy to understand. Please use the space below to give us any es that came with it.					
How long did it take you to fill in this form?						
We will use your feedback to improve our forms and guidance made simpler.	notes, and to tell the Government how regulations could be					
•						
Would you like a reply to your feedback?						
Yes please						
No thank you						

Crystal Mark 19101 Clarity approved by Plain English Campaign

For Environment Agency use only	
Date received (DD/MM/YYYY)	Payment received?
	No 🗆
Our reference number	Yes ☐ Amount received
	_ f

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Application for an environmental permit – Part C2 – General – varying a bespoke permit



Fill in this part of the form, together with part A and the relevant parts of C3 to C7 and part F1 or F2, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or changing existing ones).

Waste operation changing to installation or vice versa?

If your changes mean that a waste operation becomes an installation (or vice versa) you also need to fill in either part C3 (waste to installation) or part C4 (installation to waste).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this form.

Contents

- 1 About the permit
- 2 About your proposed changes
- 3 Your ability as an operator
- 4 Consultation
- 5 Supporting information
- 6 Environmental risk assessment
- 7 How to contact us

Appendix 1 – Low impact installation checklist

1 About the permit

Note: If you are applying to convert your existing permit to a standard permit or add a standard facility you need to fill out form C1.

1a Discussions before your application

If you have had discussions with us before your application, provide the permit reference number or details on a separate sheet and tell us below the reference you have given the document.

tell us below the reference you have given the document.	
Permit or document reference number	
1b Permit number What is the permit number that this application relates to?	L
1c Site details What is the name, address and postcode of the site? Site name	L
Address	
Postcode	
2 About your proposed changes	
2a Type of variation What type of variation are you applying for? (Please tick)	
Standalone water discharge activity or point source groundwater activity	
Minor technical	
Normal variation	
Substantial	

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Form EPC: Application for an environmental permit - Part C2 general - varying a bespoke permit 2 About your proposed changes, continued Changes or additions to existing activities 2b Please give us brief details in the box below. More detailed information can be given in Table 1 below. Fill in Table 1 with details of all the proposed changes to current activities. In the final column of the table, give us the document reference for the proposed changes and send them to us with your filled in application form. Fill in a separate table for each activity you are applying to vary or add. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given this document. Document reference You only need to fill in one table for your mining waste operations. 2c Consolidating (combining) or updating existing permits If your proposed change is to modernise (update) your permit, now answer 2c1; otherwise go to 2d. If your proposed change is to consolidate (combine) a number of permits, now answer 2c2; otherwise go to 2d. Note: In both cases we may require additional information from you about, for example, your management system. Therefore we would always advise you to talk to us before you submit any application to modernise or consolidate permits. 2c1 Do you want to have a modern style permit? No 🗌 Yes 🗌 2c2 Identify all the permits you want to consolidate (combine) by listing the permit numbers in Table 2 below. Table 2 - Permit numbers 2d Treating batteries Are you proposing to treat batteries? No □ Yes Tell us how you will do this and send us a copy of your explanation Document reference for the explanation Ship recycling Is your activity covered by the Ship Recycling Regulations 2015? (See the guidance notes on part C2.) No \square Tell us how you will do this. Please send us a copy of your explanation and your facility recycling plan, and tell us below the Yes 🗌 reference numbers you have given these documents. Document reference for the explanation Document reference for the facility recycling plan Is this a renewal of an existing authorisation covered by the Ship Recycling Regulations 2015?

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No □

Yes Tell us the expiry date of your existing authorisation

(DD/MM/YYYY)

Table 1 – Changes to existing activities

Name	Installation schedule 1 references	Description of the installation activity	Description of waste operation	Description of the mining waste operations	Description of water discharge activity	Description of groundwater activity	Proposed changes document reference
i.e. name of installation, waste operation, mining waste operation, water discharge activity or groundwater activity							
Example – Effluent unique name					Example – treated sewage effluent		
If you do not have enough room, go to the line below or send a separate document and give us the document reference here							

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2 About your proposed changes, continued 2f Low impact installations (installations only) Will any changes mean that any of the regulated facilities will become low impact installations? No Now go to section 3 Yes 🗌 If yes, tell us how you meet the conditions for a low impact installation (see the guidance in appendix 1). Document reference for the explanation Tick the box to confirm you have filled in the low impact installation checklist in appendix 1 for each regulated facility. \Box Now go to section 3 3 Your ability as an operator If you are applying to add waste installations or waste operations to a permit that has not previously had them, you need to fill in all of section 3. If you are applying to consolidate (combine) two or more permits or have an updated permit you must fill in question 3d. This section does not apply for applications to surrender a permit. Relevant offences (installations and waste operations only – see the guidance notes on part C2) Have you, or any other relevant person, been convicted of any relevant offence? No Now go to question 3b Yes Please give details below Name of the relevant person Title (Mr, Mrs, Miss and so on) First name Last name Date of birth (DD/MM/YYYY) Position at the time of the offence Name of the court Date of the conviction (DD/MM/YYYY) Offence and penalty set Date any appeal against the conviction will be heard (DD/MM/YYYY) If necessary, use a separate sheet to give us details of other relevant offences and tell us below the reference number you have given the extra sheet. Now go to question 3b 3b Technical ability (specified waste management activities and waste operations only – see the guidance notes on part C2) Please indicate which of the two schemes you are using to demonstrate you are technically competent to operate your facility and the evidence you have enclosed to demonstrate this. **ESA/EU skills**

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I have enclosed a copy of the current Competence Management System certificate

3 Your ability as an operator, continued

CIWM/WAMITAB 9	scheme		
Please select one of			
 I have enclosed 	a copy of:		
 the relevant 	t qualification certificate/s		
or			
 evidence of 	deemed competence		
or			
 Environmer 	nt Agency assessment		
or			
 evidence of 	nominated manager status under the	transitional provisions for previously exempt	activities \square
and, if deemed over two years o		nere is evidence of a nominated manager, or if	the original qualification is
I have enclosed	a copy of the relevant current continui	ing competence certificate/s \qed	
	competent manager please give the fo elow the document reference you have	ollowing information. If necessary, use a separe given the extra sheet:	rate sheet to give us these
Title (Mr, Mrs, Miss a	and so on)		
First name		1	
Last name			
Date of birth (DD/MI	M/YYYY)		
Phone			
Mobile			
Email			
	unvironmental permit number/s and sit	te address for all other waste activities that th	e proposed technically
		cluding permits held by other operators.	e proposed teermedity
Permit number	Site address		Postcode
Document reference	of the extra sheet		
Now go to question	3c		
Please note that if y	ou knowingly or carelessly make a sta	mining waste operations – see the guida Itement that is false or misleading to help you ng an offence under the Environmental Permit	get an environmental
proceedings against		were a relevant person have current or past ba	nkruptcy or insolvency
No 🗆	Act of the common of the land of the control	and the state of t	
	details over page, including the requir ility against which a credit check may	red set-up costs (including infrastructure), ma be assessed.	intenance and clean up costs

We may want to contact a credit reference agency for a report about your business's finances.

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3 Your ability as an operator, continued

Landfill, Category A mining waste facilities and mini	ng waste facilities for hazardous waste only
How do you plan to make financial provision (to operate a landfill financially capable of meeting the obligations of closure and after	
Bonds	
Escrow account	
Trust fund	
Lump sum	
Other	
Provide a plan of your estimated expenditure on each phase of the	e landfill or mining waste facility.
Give the document plan reference number	
Now go to question 3d	
3d Management systems	
You must have an effective, written management system in place by using a certified scheme or your own system.	that identifies and reduces the risk of pollution. You may show this
Your permit requires you (as the operator) to ensure that you management system. You can find guidance on management syst environment-agency.	age and operate your activities in accordance with a written ems on our website at www.gov.uk/government/organisations/
You can find guidance on management systems on our website at	www.gov.uk/government/organisations/environment-agency.
Tick this box to confirm that you have read the guidance and that your management system will meet our requirements.	
What management system will you provide for your regulated facil	ity?
EC Eco-Management and Audit Scheme (EMAS)	
EMAS Easy	
ISO 14001	
BS 8555 (Phases 1–5)	
Acorn	
Green Dragon	
Own management system	
Please make sure you send us a summary of your management sy	stem with your application.
Document reference or references for this summary	
4 Consultation (fill in 4a to 4c for installations and	waste operations and 4d for installations only)
Could the waste operation or installation involve releasing	any substance into any of the following?
4a A sewer managed by a sewerage undertaker?	
No 🗆	
Yes Please name the sewerage undertaker	
4b A harbour managed by a harbour authority? No □	
Yes Please name the harbour authority	
4c Directly into relevant territorial waters or coastal water	ors within the see fisheries district of a local fisheries
committee?	sis within the sea fisheries district of a local fisheries
No 🗆	
Yes Please name the fisheries committee	
4d Is the installation on a site for which	
4d1 a nuclear site licence is needed under section 1 of the Nuclear	ar Installations Act 1965?
No 🗆	
Yes 🗌	

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continued 4d2 a policy document for preventing major accidents is needed under regulation 5 of the Control of Major Accident Hazards Regulations 1999, or a safety report is needed under regulation 7 of those regulations? Yes 🗌 5 **Supporting information** Provide a plan or plans for the site (see the guidance notes on part C2 for what needs to be marked on the plan) Document plan reference or references Do any of the variations you plan to make need extra land to be included in the permit? No □ Yes 🗌 Please provide a site report for the extra land. Document report reference or references Provide a non-technical summary of your application Document reference 5d Are you applying for an activity that includes the storage of combustible wastes? This applies to all activities excluding standalone water and groundwater discharges. Yes 🔲 Provide a fire prevention plan (see the guidance notes on part C2). You need to highlight any changes you have made since your pre-application discussions. No \square 5e Adding an installation If you are applying to add an installation, tick the box to confirm that you have sent in a baseline report and provide a reference. Document reference of the report Environmental risk assessment (if you need one – see the guidance notes on part C2) Provide an assessment of the risks each of your proposed activities cause to the environment. The risk assessment must follow the methodology set out in 'Risk assessments for your environmental permit' at https://www.gov.uk/guidance/risk-assessments-foryour-environmental-permit or an equivalent method. Document reference of the assessment How to contact us If you need help filling in this form, please contact the person who sent it to you or contact us as shown below. General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm) Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm) Email: enquiries@environment-agency.gov.uk Website: www.gov.uk/government/organisations/environment-agency

Consultation (fill in 4a to 4c for installations and waste operations and 4d for installations only),

touch with you more easily.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with

our service, please tell us how we can improve it.

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Feed	L -	_	ı
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You don't have to answer this part of the form, but it will help us improve our forms if you do.)					
asy to understand. Please use the space below to give us any t came with it.					
s, and to tell the Government how regulations could be					
11					

Crystal Mark 19110 Clarity approved by Plain English Campaign

For Environment Agency use only	
Date received (DD/MM/YYYY)	Payment received?
	No □
Our reference number	Yes Amount received
	_ f

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Plain English Campaign's Crystal Mark does not apply to appendix 1. Appendix 1 – Low impact installation checklist

Installation reference				
Condition	Response	Do you meet this?		
A – Management techniques	Provide references to show how your application meets A.			Yes
	References			No □
B – Aqueous waste	Effluent created		m³/day	Yes No
C – Abatement systems	Provide references to sho	w how your application	meets C.	Yes
	References			No □
D – Groundwater	Do you plan to release any substances or non-hazard the ground?		Yes □ No □	Yes No
E – Producing waste	Hazardous waste		Tonnes per year	Yes 🗌
	Non-hazardous waste		Tonnes per year	No 🗆
F – Using energy	Peak energy consumption		MW	Yes □ No □
G – Preventing accidents	Do you have appropriate measures to prevent spills and major releases of liquids? (See 'How to comply'.)			Yes \[\] No \[\]
	Provide references to show how your application meets G.			
	References			_
H – Noise	Provide references to show how your application meets H.			Yes 🗌
	References No 🗆			
I – Emissions of polluting substances	Provide references to show how your application meets I.			Yes 🗆
	References No L			
J – Odours	Provide references to show how your application meets J.			Yes 🗆
	References No			
K – History of keeping to the regulations	Say here whether you have been involved in any enforcement action as described in Compliance History Appendix 1 explanatory notes.			

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Application for an environmental permit Part C3 – Variation to a bespoke installation permit



Fill in this part of the form, together with part A, part C2 and part F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.

2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than three hours to fill in this part of the application form.

Contents

- 1 What activities are you applying to vary?
- 2 Emissions to air, water and land
- 3 Operating techniques
- 4 Monitoring
- 5 Environmental impact assessment
- 6 Resource efficiency and climate change
- 7 How to contact us

Appendix 1 – Specific questions for the combustion sector Appendix 2 – Specific questions for the chemical sector Appendix 3 – Specific questions for the intensive farming

Appendix 3 – Specific questions for the intensive farming sector

Appendix 4 – Specific questions for the clinical waste sector Appendix 5 – Specific questions for the hazardous and non-

hazardous waste recovery and disposal sector Appendix 6 – Specific questions for the waste incineration sector

Appendix 7 - Specific questions for the landfill sector

1 What activities are you applying to vary?

Fill in Table 1a below with details of all the activities listed in schedule 1 of the Environmental Permitting Regulations (EPR) and all directly associated activities (DAAs) (in separate rows), that you propose to carry out at the installation.

Fill in a separate table for each installation you are applying to vary. Use a separate sheet if you have a long list and send it to us with your application form. Tell us below the reference you have given the document.

Document reference

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Table 1a – Types of activities

Schedule 1 references (See note 1)	Description of the Activity (See note 2)	Activity capacity (See note 3)	Annex I (D codes) and Annex II (R codes) and descriptions	Hazardous waste treatment capacity (if this applies) (See note 3)	Non-hazardous waste treatment capacity (if this applies) (See note 3)
Put your main activity first			For installations that take waste only	For installations that take waste only	For installations that take waste only
s (See note 4)					
	Description of the DAA (plea	ase identify the schedule 1 ac	ctivity it serves)		
them					
aste	Total storage capacity (See note 5 below)				
	Annual throughput (tonnes	each year)			
	Put your main activity first s (See note 4)	Put your main activity first See note 4) Description of the DAA (pleatherm) Them Total storage capacity (See	Put your main activity first Description of the DAA (please identify the schedule 1 activem	(See note 1) (See note 2) note 3) Annex II (R codes) and descriptions For installations that take waste only For installations that take waste only See note 4) Description of the DAA (please identify the schedule 1 activity it serves) them Total storage capacity (See note 5 below)	See note 1) (See note 2) note 3) Annex II (R codes) and descriptions treatment capacity (if this applies) (See note 3) Put your main activity first Put your main activity first Por installations that take waste only For installations that

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1 What activities are you applying to vary?, continued

Notes

- 1 Quote the section number, part A1 or A2 or B, then paragraph and sub paragraph number as shown in part 2 of schedule 1 to the regulations.
- 2 Use the description from schedule 1 of the regulations. Include any extra detail that you think would help to accurately describe what you want to do.
- 3 By 'capacity', we mean:
 - the total incineration capacity (tonnes every hour) for waste incinerators;
 - the total landfill capacity (cubic metres) for landfills;
 - the total treatment capacity (tonnes each day) for waste treatment;
 - the total storage capacity (tonnes) for waste storage operations;
 - the processing and production capacity for manufacturing operations; or
 - the thermal input capacity for combustion activities.
- 4 Fill this in as a separate line and give an accurate description of any other activities associated with your schedule 1 activities. You cannot have DAAs as part of a mobile plant application.
- 5 By 'total storage capacity', we mean the maximum amount of waste, in tonnes, you store on the site at any one time.

Types of waste accepted

For those installations that take waste, for each line in Table 1a (including DAAs), fill in a separate document to list those wastes you will accept on to the site for that activity. Give the List of Wastes catalogue code and description (search for 'Technical guidance on how to assess and classify waste' at www.gov.uk/environment-agency).

. If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. Send it to us with your application form.

Please provide the reference for each document.

You can use Table 1b as a template.

If you want to accept any wastes with a code ending in 99, you must give us more information and a full description.

Document reference for this extra information

Table 1b – Template example – types of waste accepted and restrictions

Waste code	Description of waste
Example	Example
02 01 08*	Agrochemical waste containing hazardous substances
06 01 02*	Hydrochloric acid

2 Emissions to air, water and land

Fill in Table 2 below with details of the emissions that result from the operating techniques at each of your installations. Fill in one table for each installation.

Table 2 - Emissions

Installation name				
Point source emissions to air				
Emission point reference and location	Source	Parameter	Quantity	Unit

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2 Emissions to air, water and land, continued

Table 2 - Emissions, continued

Point source emissions to water (other than $% \left(1\right) =\left(1\right) \left(1\right) \left($	sewers)			
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to sewers, effluent to	reatment plants or oth	ner transfers off site		
Emission point reference and location	Source	Parameter	Quantity	Unit
Point source emissions to land				
Emission point reference and location	Source	Parameter	Quantity	Unit

Supporting information

3 Operating techniques

3a Technical standards

Fill in Table 3 for each activity, at the installation you have referred to in Table 1a above. List the relevant technical guidance note (TGN) or notes you are planning to use. If you are planning to use the standards set out in the TGN, there is no need to justify using them.

You must justify your decisions in a separate document if:

- there is no technical standard;
- the technical guidance provides a choice of standards; or
- you plan to use another standard.

This justification could include a reference to the Environmental Risk Assessment provided in part C2 (general bespoke permit) of the application form.

The documents you have referenced in Table 3 should summarise the main measures you use to control the main issues identified in your risk assessment (search for 'Risk assessment for your environmental permit' at www.gov.uk/environment-agency) or technical guidance. For each of the activities listed in Table 3, describe the type of operation and the options you have chosen for controlling emissions from your process.

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3 Operating techniques, continued

Table 3 - Technical standards

Fill in a separate table for each activity at the installation.

Installation name		
Description of the schedule 1 activity or directly associated activity	Relevant technical guidance or best available techniques as described in BAT conclusions under IED (see footnote below)	Document reference (if appropriate)
*Directive 2010/75/EU of the European Parliament a pollution prevention and control)	and of the Council of 24 November 2010 on indu	ustrial emissions (integrated
f appropriate, use block diagrams to help describe t	the operation and process. Provide the reference	ces for the description.
Document reference for the diagram or description		
3a1 Does your permit (in Table 2.1 Operating 1 documents or parts of documents submitted a No ☐ Go to 3b Yes ☐ Tell us in a separate document what document reference.	s part of a previous application for this si	te?
Tell us below the reference number you have given t	he document and send it in with your application	on.
Document reference	L	

3b General requirements

Fill in a separate Table 4 for each installation.

Table 4 – General requirements

Name of the installation	
If the TGN or your risk assessment shows that emissions of substances not controlled by emission limits are an important issue, send us your plan for managing them	Document reference or references
Where the TGN or your risk assessment shows that odours are an important issue, send us your odour management plan	Document reference or references
If the TGN or your risk assessment shows that noise or vibration are important issues, send us your noise or vibration management plan (or both)	Document reference or references

Search for 'Risk assessment for your environmental permit' at www.gov.uk/environment-agency.

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3 Operating techniques, continued

3c Types and amounts of raw materials

Fill in Table 5 for all schedule 1 activities. Fill in a separate table for each installation.

Table 5 - Types and amounts of raw materials

Name of the installation				
Capacity (See note 1 bel	ow)			
Schedule 1 activity	Description of raw material and composition	Maximum amount (tonnes) (See note 2 below)	Annual throughput (tonnes each year)	Description of the use of the raw material including any main hazards (include safety data sheets)

Notes

- 1 By 'capacity', we mean the total storage capacity (tonnes) or total treatment capacity (tonnes each day).
- 2 By 'maximum amount', we mean the maximum amount of raw materials on the site at any one time.

Use a separate sheet if you have a long list of raw materials, and send it to us with your application form. Please also provide the reference for this extra sheet.

Document reference for the sheet	

3d Information for specific sectors

For some of the sectors, we need more information to be able to set appropriate conditions in the permit. This is as well as the information you may provide in sections 5, 6 and 7. For those activities listed below, you must answer the questions in the related document.

Table 6 – Questions for specific sectors

Sector	Appendix
Combustion	See the questions in appendix 1
Chemicals	See the questions in appendix 2
Intensive farming	See the questions in appendix 3
Clinical waste	See the questions in appendix 4
Hazardous and non-hazardous waste recovery and disposal	See the questions in appendix 5
Incinerating waste	See the questions in appendix 6
Landfill	See the questions in appendix 7

General information

4 Monitoring

4a Describe the measures you use for monitoring emissions by referring to each emission point in Table 2 above

You should also describe any environmental monitoring. Tell us:

- how often you use these measures;
- the methods you use; and
- the procedures you follow to assess the measures.

Document	reference
----------	-----------

4b Point source emissions to air only

Provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must use M1 (search for 'M1 sampling requirements for stack emission monitoring' at www.gov.uk/environment-agency).

Document reference of the assessment	

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5a Have your proposals been the subject of an environmental impact assessment under Council Directive

5 Environmental impact assessment

our service, please tell us how we can improve it.

85/3 3 No □	37/EEC of 27 June 1985 [Environmental Impact Assessn	nent]?
Yes 🗌		if the procedure has been completed:
6 I	Resource efficiency and climate change	
If the s	site is a landfill, you only need to fill in this section if the appli	cation includes landfill gas engines.
6a I	Describe the basic measures for improving how energy	y efficient your activities are
Docun	nent reference for the description	
6b I	Provide a breakdown of any changes to the energy you	r activities use up and create
Docun	nent reference for the description	
No □	Document reference for the description	energy efficiency.
	nent reference of the justification	substances and water that you will use
6e l If you p	Describe how you avoid producing waste in line with Co	and financially impossible to recover the waste, describe how you
Docun	nent reference of the description	
If you if General Textph Email:	How to contact us need help filling in this form, please contact the person who sal enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm) none: 03708 422 549 (Monday to Friday, 8am to 6pm) enquiries@environment.agency.gov.uk	sent it to you or contact us as shown below.
websi	te: www.gov.uk/environment-agency	

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with

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tee	ш	U	a	L	١

(You don't have to answer this part of the form, but it will help us improve our forms if you do.) We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.					
How long did it take you to fill in this form?					
We will use your feedback to improve our forms and guidance notes,	and to tell the Government how regulations could be				
made simpler.					
Would you like a reply to your feedback?					
Yes please					
No thank you					



For Environment Agency use only	
Date received (DD/MM/YYYY)	Payment received?
	No 🗆
Our reference number	Yes ☐ Amount received
I	

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Plain English Campaign's Crystal Mark does not apply to appendices 1 to 7.

Appendix 1 - Specific questions for the combustion sector

1 Identify the type of fuel burned in your combustion units (including when your units are started up, shut down and run as normal). If your units are dual fuelled (that is, use two types of fuel), list both the fuels you use

Fill in a separate table for each installation.

Installation reference			
Type of fuel	When run as normal	When started up	When shut down
Coal			
Gas oil			
Heavy fuel oil			
Natural gas			
WID waste			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Biomass (see notes 1 and 2 below)			
Other			

Notes

- 1 Not covered by Industrial Emissions Directive 2010/75/EU.
- 2 'Biomass' is referred to in www.opsi.gov.uk/si/si2002/20020914.htm.

Give extra information if it helps to explain the fuel you use.

Document reference	

2 Give the composition range of any fuels you are currently allowed to burn in your combustion plant

Fill in a separate table for each installation.

Fuel use and analysis						
Installation reference						
Parameter	Unit	Fuel 1	Fuel 2	Fuel 3	Fuel 4	
Maximum percentage of gross thermal input	%					
Moisture	%					
Ash	% wt/wt dry					
Sulphur	% wt/wt dry					
Chlorine	% wt/wt dry					
Arsenic	% wt/wt dry					
Cadmium	% wt/wt dry					
Carbon	% wt/wt dry					
Chromium	% wt/wt dry					
Copper	% wt/wt dry					
Hydrogen	% wt/wt dry					
Lead	% wt/wt dry					
Mercury	% wt/wt dry					
Nickel	% wt/wt dry					
Nitrogen	% wt/wt dry					
Oxygen	% wt/wt dry					
Vanadium	mg/kg dry					
Zinc	mg/kg dry					
Net calorific value	MJ/kg					

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Appendix 1 – Specific questions for the combustion sector, continued

3 If NOx factors are necessary for reporting purposes (that is, if you do not need to monitor emissions), please provide the factors associated with burning the relevant fuels

Fill in a separate table for each installation.

Installation reference		
Fuel	NOx factor (kgt ⁻¹)	
Fuel 1		
Fuel 2		
Fuel 3		
Fuel 4		
Note: kgt ⁻¹ means kilograms of nitrogen oxides released for each	tonne of fuel burned.	
4 Will your combustion plant be subject to Chapter III of the Industrial Emissions Directive 2010/75/EU? (see Government Guidance)		
No Now fill in part F		
Yes □		
5 Is your plant		
an existing plant (a plant licensed before 1 July 1987)?		
a new plant (a plant licensed on or after 1 July 1987 but before		
27 November 2002, or a plant for which an application was		
made before 27 November 2002 and which was put into		
operation before 27 November 2003)?		
or a new-new plant (a plant for which an application was made on		
or after 27 November 2002)?		
	the same type of plant on your installation, please list then	
in the table below		
Fill in a separate table for each installation.		
Installation reference		
Type of plant	Number within installation	
Existing		
New		
New-new		
Gas turbine (group A)		
Gas turbine (group B)		
 7 If you run an existing plant, have you submitted a decof Chapter III of the Industrial Emissions Directive? No \(\subseteq \text{ Now go to section 9} \) Yes \(\subseteq \text{ Have you subsequently withdrawn your declaration?} \) 	claration for the 'limited life derogation' set out in Article 33	
No □		
Yes □		

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9 List the existing large combustion plants (LCPs) which have annual mass allowances under the National Emission Reduction Plan (NERP), and those with emission limit values (ELVs) under the LCPD

Installation reference	
LCPs under NERP	LCPs with ELVs
10 Do you meet the monitoring requirements of	Chapter III of the Industrial Emissions Directive?
Yes	
Document reference number	
11a Are you substantially refurbishing an existing	g installation according to the meaning given in Article 14 of the
Energy Efficiency Directive?	
No 🗆	
Yes 🗌 Please go to question 11b	
11b Have you carried out a cost-benefit assessmoower) or district heating under Article 14 of the E	ent (CBA) of opportunities for cogeneration (combined heat and nergy Efficiency Directive?
No Please provide supporting evidence of why a CB	BA is not required (for example, an agreement from us)
Document reference number of this evidence	
Yes ☐ Please submit a copy of your CBA	
Document reference number of the CBA	· f

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Appendix 2 - Specific questions for the chemical sector

1 Please provide a technical description of your activities

The description should be enough to allow us to understand:

- the process;
- the main plant and equipment used for each process;
- all reactions, including significant side reactions (that is, the chemistry of the process);
- the material mass flows (including by products and side streams) and the temperatures and pressures in major vessels;
- the all emission control systems (both hardware and management systems), for situations which could involve releasing a significant amount of emissions particularly the main reactions and how they are controlled;
- a comparison of the indicative BATs and benchmark emission levels standards: technical guidance notes (TGNs); additional guidance 'The production of large volume organic chemicals' (EPR 4.01); 'Speciality organic chemicals sector' (EPR 4.02); 'Inorganic chemicals sector' (EPR 4.03); and best available techniques reference documents (BREFs) for the chemical sector.

'Inorganic chemicals sector' (EPR 4.03); and best available	techniques reference documents (BREFs) for the chemical sector.
Document reference	
If you are applying for a multi-purpose plant, do you changes? No Provide a copy of your protocol to accompany this appli	u have a multi-product protocol in place to control the
Document reference	ication .
3 Does Chapter V of the Industrial Emissions Directive No □ Yes □ Fill in the following	e (IED) apply to your activities?
3a List the activities which are controlled unde	r the IED
Installation reference	
Activities	
3b Describe how the list of activities in question 3a above meets the requirements of the IED	
Document reference	<u>.</u>
Appendix 3 – Specific questions for the intensive fa	orming sector
1 For each type of livestock, tell us the number of ani	
***	inat places you are applying for
Installation reference	
Type of livestock	Number of places
2 Is manure or slurry exported from the site? No Yes Is manure or slurry spread on the site?	
No □ Yes □	

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Appendix 4 - Specific questions for the clinical waste sector

If you are applying for an activity covered by Chapter IV of the Industrial Emissions Directive and wish to accept clinical waste you should fill in questions 1, 2 and 3 of this appendix.

Note: If your procedures are fully in line with the standards set out in 'Technical guidance for managing clinical waste' (EPR 5.07) then you should tick the 'yes' box and provide the procedure reference from EPR 5.07. There is no need for you to supply a copy of the procedure.

	are pre-acceptance procedures in place that are full 5.07 and which are used to assess a waste enquir	y in line with the appropriate measures set out in section 2.2 before it is accepted at the installation?
No 🗆	Provide justification for departure from EPR 5.07 and su	ubmit a copy of your procedures
	Document reference	
Yes 🗌	EPR 5.07 procedure reference	
2.2 of rejecti	EPR 5.07, and which are used to cover issues suching waste, and keeping records to track waste?	ully in line with the appropriate measures set out in section as loads arriving and being inspected, sampling waste,
No 🗆	Provide justification for departure from EPR 5.07 and su	ubmit a copy of your procedures
	Document reference	
Yes 🗌	EPR 5.07 procedure reference	
appro	priate measures set out in section 3.2 of EPR 5.07?	
No 🗆	Provide justification for departure from EPR 5.07 and su	ubmit a copy of your procedures
	Document reference	
Yes 🗌	EPR 5.07 procedure reference	
4 A EPR 5.	- · · · · · · · · · · · · · · · · · · ·	line with the appropriate measures set out in section 3.3 of
No 🗆	Provide justification for departure from EPR 5.07 and su	ubmit a copy of your procedures
	Document reference	
Yes 🗌	EPR 5.07 procedure reference	
5 A	re you proposing to either	
	cept an additional waste not included in Table 2.1 of secti	
apNo □	ply a permitted activity to a waste other than that identifi	ed for that waste in Table 2.1?
Yes 🗌	Provide justification	
	Document reference	
	lease provide a summary description of the treatm the general principles set out in section 2.1.4 of EP	nent activities undertaken on the installation. This should PR 5.07
Docum	ent reference for summary	
	lease provide layout plans detailing the location ouns for the treatment plant	f each treatment plant and main plant items and process flow
Docum	ent reference	

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Appendix 5 - Specific questions for the hazardous and non-hazardous waste recovery and disposal sector

Note: If your procedures are fully in line with the standards set out in 'Recovery and disposal of hazardous and non-hazardous waste' (SGN 5.06) then you should tick the 'yes' box and provide the procedure reference from SGN 5.06. There is no need for you to supply a copy of the procedure.

Are pre-acceptance procedures in place that are fully in line with the appropriate measures set out in section

2.1.1	of SGN 5.06, and which are used to assess a waste enq	uiry before it is accepted at the installation?
No 🗆	Provide justification for departure from SGN 5.06 and submi	t a copy of your procedures
	Document reference	
Yes 🗌	SGN 5.06 procedure reference	
2.1.2 c	re waste acceptance procedures in place that are fully of SGN 5.06, and which are used to cover issues such a ng waste, and keeping records to track waste?	in line with the appropriate measures set out in section s loads arriving and being inspected, sampling waste,
No 🗆	Provide justification for departure from SGN 5.06 and submi	t a copy of your procedures
	Document reference	
Yes 🗌	SGN 5.06 procedure reference	
	re waste storage procedures and infrastructure in plac section 2.1.3 of SGN 5.06?	e that are fully in line with the appropriate measures set
No 🗆	Provide justification for departure from SGN 5.06 and submi	t a copy of your procedures
	Document reference	
Yes 🗌	SGN 5.06 procedure reference	
and st		ation is based, the infrastructure in place (including areas ay be dangerous to store together) and capacity of waste
Docum	ent reference	
princip	rovide a summary of the treatment activities carried outles set out in section 2.1.4 of SGN 5.06 and the specifioriate of SGN 5.06	
Docum	ent reference for summary	
	rovide layout plans giving details of where each treatn is flow diagrams for the treatment plant	nent plant is based, the main items at each plant, and
Docum	ent reference or references	

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Form EPC: Application for an environmental permit - Part C3 varying a bespoke installation permit Appendix 6 – Specific questions for the waste incineration sector If you are proposing to accept clinical waste please also fill in questions 1, 2 and 3 of appendix 4 above. Do you run incineration plants as defined by Chapter IV of the Industrial Emissions Directive (IED)? No \(\square\) You do not need to answer any other questions in this appendix Yes | IED applies 1b Are you subject to IED as an incinerator or co-incinerator? As an incinerator As a co-incinerator Do any of the installations contain more than one incineration line? No Now go to section 4 Yes 🗌 3 How many incineration lines are there within each installation? Fill in a separate table for each installation Installation reference Number of incineration lines within the installation Reference identifiers for each line You must provide the information we ask for in questions 4, 5 and 6 below in separate documents. The information must at least include all the details set out in section 2 ('Key Issues') of \$5.01 'Incineration of waste: additional guidance' (under the sub heading 'European legislation and your application for an EP Permit'). You must answer questions 7 to 13 on the form below. Describe how the plant is designed, equipped and will be run to make sure it meets the requirements of IED, taking into account the categories of waste which will be incinerated Document reference Describe how the heat created during the incineration and co-incineration process is recovered as far as possible (for example, through combined heat and power, creating process steam or district heating) Document reference Describe how you will limit the amount and harmful effects of residues and describe how they will be recycled where this is appropriate Document reference For each line identified in question 3, answer questions 7 to 13 below Question 3 identifier, if necessary Do you want to take advantage of the Article 45 (1)(f) allowance (see below) if the particulates, CO or TOC continuous emission monitors (CEM) fail? No □ This allows 'abnormal operation' of the incineration plant under certain circumstances when the CEM for Yes 🗌 releases to air have failed. Annex VI, Part 3(2) sets maximum half hourly average release levels for particulates (150mg/m³), CO (normal ELV) and TOC (normal ELV) during abnormal operation. Describe the other system you use to show you keep to the requirements of Article 13(4) (for example, using another CEM, providing a portable CEM to insert if the main CEM fails, and so on).

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Appendix 6 – Specific questions for the waste incineration sector, continued

monitorir Under this level belov	you want to replace continuous HF emission monitoring with periodic hydrogen fluoride (HF) emission ng by relying on continuous hydrogen chloride (HCl) monitoring as allowed by IED Annex VI, Part 6 (2.3)? syou do not have to continuously monitor emissions for hydrogen fluoride if you control hydrogen chloride and keep it to a w the HCl ELVs.
No 🗆	
Yes 🗌 Pl	lease give reasons for doing this
	you want to replace continuous water vapour monitoring with pre-analysis drying of exhaust gas samples, as by IED Annex VI, Part 6 (2.4)?
	s you do not have to continuously monitor the amount of water vapour in the air released if the sampled exhaust gas is dried emissions are analysed.
No 🗌	
Yes 🗌 Pl	lease give your reasons for doing this
	you want to replace continuous hydrogen chloride (HCl) emission monitoring with periodic HCl emission ng, as allowed by IED Annex VI, Part 6 (2.5), first paragraph?
	s you do not have to continuously monitor emissions for hydrogen chloride if you can prove that the emissions from this
	will never be higher than the ELVs allowed.
No □	
	lease give your reasons for doing this
163 L F	tease give your reasons for doing this

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Appendix 6 – Specific questions for the waste incineration sector, continued

Do you want to replace continuous HF emission monitoring with periodic HF emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph? Under this you do not have to continuously monitor emissions for hydrogen fluoride if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed. No 🗆 Yes

Please give your reasons for doing this Do you want to replace continuous SO_2 emission monitoring with periodic sulphur dioxide (SO_2) emission monitoring, as allowed by IED Annex VI, Part 6 (2.5), first paragraph? Under this you do not have to continuously monitor emissions for sulphur dioxide if you can prove that the emissions from this pollutant will never be higher than the ELVs allowed. No □ Yes

Please give your reasons for doing this If your plant uses fluidised bed technology, do you want to apply for a derogation of the CO WID ELV to a maximum of 100 mg/m³ as an hourly average, as allowed by IED Annex VI, Part 3? No □ Does not apply Yes

Please give your reasons for doing this

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Appendix 6 – Specific questions for the waste incineration sector, continued

Ene	rgy Efficiency Directive?
No	
Yes	☐ Please go to question 14b
pov No Doc Yes	14b Have you carried out a cost-benefit assessment (CBA) of opportunities for cogeneration (combined heat and ver) or district heating under Article 14 of the Energy Efficiency Directive? Please provide supporting evidence of why a CBA is not required (for example, an agreement from us) ument reference number of this evidence Please submit a copy of your CBA ument reference number of the CBA
Ap	pendix 7 – Specific questions for the landfill sector
1	Provide your Environmental Setting and Installation Design (ESID) report
Doc	ument reference
2	Provide your hydrogeological risk assessment (HRA) for the site
Doc	ument reference
3	Provide your stability risk assessment (SRA) for the site
Doc	ument reference
4	Provide your landfill gas risk assessment (LFGRA) for the site
Doc	ument reference
	nave developed templates for these four reports which can be found at s://www.gov.uk/government/collections/environmental-permitting-landfill-sector-technical-guidance
5	Provide your proposed plan for closing the site and your procedures for looking after the site once it has closed
Doc	ument reference

14a Are you substantially refurbishing an existing installation according to the meaning given in Article 14 of the

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Application for an environmental permit Part C5 – Varying a permit to become a mining waste operation permit or varying a bespoke mining waste permit



Fill in this part of the form, together with part A, part C2 and part F1, if you are applying to vary (change) the conditions or any other part of the permit. Please check that this is the latest version of the form available from our website.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new facility or making changes to existing ones).

You do not need to resend any information from your original permit application if it is not affected by your proposed changes.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

- 1 What activities are you applying to vary?
- 2 Waste-management plan
- 3 External emergency plans
- 4 Additional information
- 5 How to contact us

1 What activities are you applying to vary?

1a Tick the relevant box below (to see the full description	of each activity see the guidance notes on part C5)	
Management of any extractive waste in a Category A mining waste facility		
Management of hazardous waste		
Management of non-inert, non-hazardous extractive waste that includes a mining waste facility		
Management of non-inert, non-hazardous extractive waste that does not include a mining waste facility		
Management of inert extractive waste that includes a point- source discharge to water		
Management of inert extractive waste by passive treatment that is controlled by the conditions for the discharge set in the permit; for example, a settlement pond that becomes part of the site restoration when dry		
2 Waste-management plan		
Tick the box to confirm that you have filled in and attached the relevant waste-management plan template (see the guidance notes on part C5)		
3 External emergency plans (for Category A mining waste facilities only)		
Please provide the information we need so the relevant emergency planner can draw up an external emergency plan for the miningwaste facility or facilities.		
Document reference		
4 Additional information		
4a Does the mining waste operation include one or more in No $\ \square$	nert mining waste facilities?	
Yes Provide the number of inert mining waste facilities		

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4	Additional information, continued		
4b	Sector category		
Tick t	he correct category below:		
Cons	truction minerals		
Meta	llic minerals		
Indus	strial minerals		
	gy minerals		
Othe	r sectors		Please provide details below
Wat	er discharge		
4c No [Will the mining waste operation include an integral wat	er d	scharge regulated facility?
Yes [Provide reference number		
4d	Will the mining waste operation include an integral gro	und	water regulated facility?
No [
Yes [Provide reference number		
5	How to contact us		

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk Website: www.gov.uk/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

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Feed	ha	cl	<

You don't have to answer this part of the form, but it will help us improve our forms if you do.) We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments you may have about this form or the guidance notes that came with it.				
How long did it take you to fill in this form?				
We will use your feedback to improve our forms and guidance notes, made simpler.	, and to tell the Government how regulations could be			
Would you like a reply to your feedback?				
Yes please				
No thank you				

Crystal Mark 19113 Clarity approved by Plain English Campaign

For Environment Agency use only	
Date received (DD/MM/YYYY)	Payment received?
	No 🗆
Our reference number	Yes ☐ Amount received
	f

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Application for an environmental permit Part F1 – Charges and declarations



Fill in this part for all applications for installations, waste operations, mining waste operations, water discharges, point source groundwater discharges and groundwater discharges onto land. Please check that this is the latest version of the form available from our website.

Please read through this form and the guidance notes that came with it.

The form can be:

- 1 Saved onto a computer and then filled in. Please note that the form follows a logic that means questions will open or stay closed depending on a previous answer. So you may not be able to enter text in some boxes.
- 2 Printed off and filled in by hand. Please write clearly in the answer spaces.

It will take less than two hours to fill in this part of the application form.

Contents

- 1 Working out charges
- 2 Payment
- 3 The Data Protection Act 1998
- 4 Confidentiality and national security
- 5 Declaration
- 6 Application checklist
- 7 How to contact us
- 8 Where to send your application

1 Working out charges (you must fill in this section)

You have to submit an application fee with your application. You can find out the charge by searching for 'Environment Agency charging scheme and guidance: environmental permits' at www.gov.uk/government/organisations/environment-agency.

Please remember that the charges are revised on 1 April each year and that there is an annual subsistence charge to cover the costs we incur in the ongoing regulation of the permit.

Table 1 Type of application (add number if more than one)

Installation	Waste	Mining waste	Water discharge/point source discharge to groundwater	Groundwater spreading onto land

Table 2 Charge type (A)

Activity description	Activity reference		Percentage charge (see charges tables)				Amount	
		100	60	50	30	20	10	
Total A	,	'			1		1	

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1 Working out charges (you must fill in this section), continued

Table 3 Additional component charges (B)

Part 1.19 Cha	arges for plans and assessments			Tick appropriate
Reference	Plan or assessment		Charge	
1.19.1	Waste recovery plan		f1,231	
1.19.2	Habitats assessment		£779	
1.19.3	Fire prevention plan		£1,241	
1.19.4	Pest management plan		£1,241	
1.19.5	Dust management plan		£1,241	
1.19.6	Odour management plan		£1,246	
1.19.7	Noise and vibration management plan		£1,246	
1.19.8	Ammonia emissions risk assessment		£620	
1.19.9	Dust and bio-aerosol management plan		£620	
	Advertising		£500	
Total B				
Гotal charges Г otal A plus to				
Cash Credit or debi			k below to confirm you are en e application	ciosing cash with
Electronic trar	nsfer (for example, BACS)			
Remittance nu				
Date paid (DD How to pay	/MM/YYYY)			
	eque, postal order or cash			
Cheque detail	s			
Cheque made	payable to			
Cheque numb	er			
Amount	£			
f it is not alrea	ake cheques or postal orders payable to 'Environme ady printed on.		•	,
	he name of your company and application reference cept cheques with a future date on them.	number or	ı tne back of your cheque or po	ostal order.
enclose your a	ommend sending cash through the post. If you canrapplication reference details. Please tick the box belo			ivery postal service and
have enclose	ed cash with my application			

Paying by credit or debit card

If you are paying by credit or debit card, either we can call you or you can fill in the separate form CC1 and enclose it with the application. We will destroy your card details once we have processed your payment. We can accept payments by Visa, MasterCard or Maestro card only.

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2 Payment, continued

Please call me to arrange payment by debit or debit card \Box I have enclosed form CC1 with my application \Box

Paying by electronic transfer BACS reference

If you choose to pay by electronic transfer you will need to use the following information to make your payment.

Company name Environment Agency

Company address SSCL (Environment Agency), PO Box 797, Newport Gwent, NP10 8FZ

Bank RBS/NatWest

Address London Corporate Service Centre, CPB Services, 2nd Floor, 280 Bishopsgate, London EC2M 4RB

Sort code 60-70-80

Account number 10014411

Account name EA RECEIPTS

Payment reference number PSCAPPXXXXXYYY

You need to create your own reference number. It should begin with PSCAPP (to reflect that the application is for a permitted activity) and it should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). The reference number that you supply will appear on our bank statements.

You should also email your payment details and reference number to ea fsc ar@sscl.gse.gov.uk.

If you are making your payment from outside the United Kingdom, it must be in sterling. Our IBAN number is GB23NWK60708010014411 and our SWIFTBIC number is NWBKGB2L.

If you do not quote your reference number, there may be a delay in processing your payment and application.

Now read section 3 below.

3 The Data Protection Act 1998

We, the Environment Agency, will process the information you provide so that we can:

- deal with your application;
- make sure you keep to the conditions of the licence, permit or registration;
- process renewals; and
- keep the public registers up to date.

We may also process or release the information to:

- offer you documents or services relating to environmental matters;
- consult the public, public organisations and other organisations (for example, the Health and Safety Executive, local authorities, the emergency services, the Department for Environment, Food and Rural Affairs) on environmental issues;
- carry out research and development work on environmental issues;
- provide information from the public register to anyone who asks:
- prevent anyone from breaking environmental law, investigate cases where environmental law may have been broken, and take
 any action that is needed;
- assess whether customers are satisfied with our service, and to improve our service; and
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows). We may pass the information on to our agents or representatives to do these things for us.

Now read section 4 below.

4 Confidentiality and national security

We will normally put all the information in your application on a public register of environmental information. However, we may not include certain information in the public register if this is in the interests of national security, or because the information is confidential.

You can ask for information to be made confidential by enclosing a letter with your application giving your reasons. If we agree with your request, we will tell you and not include the information in the public register. If we do not agree with your request, we will let you know how to appeal against our decision, or you can withdraw your application.

Only tick the box below if you wish to claim confidentiality fo	ryour application
---	-------------------

Dl ++ +l ! f+!			
Please treat the information	in my application	i as conndentiai	

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4 Confidentiality and national security, continued

National security

You can tell the Secretary of State that you believe including information on a public register would not be in the interests of national security. You must enclose a letter with your application telling us that you have told the Secretary of State and you must still include the information in your application. We will not include the information in the public register unless the Secretary of State decides that it should be included.

You can find guidance on national security in 'Environmental permitting guidance: core guidance', published by Defra and available via our website at gov.uk.

You cannot apply for national security via this application.

Now go to section 5.

5 Declaration

If you knowingly or carelessly make a statement that is false or misleading to help you get an environmental permit (for yourself or anyone else), you may be committing an offence under the Environmental Permitting (England and Wales) Regulations 2010.

A relevant person should make the declaration (see guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

Each individual (or individual trustee) who is applying for their name to appear on the permit must complete this declaration. You will have to print a separate copy of this page for each additional individual to complete.

If you are transferring all or part of your permit, both you and the person receiving the permit must make the declaration. You must fill in the declaration directly below; the person receiving the permit must fill in the declaration under the heading 'For transfers only'.

Note: we will issue a letter to both current and new holders to confirm the transfer. If you are changing address we will need to send this letter to your new address; therefore please tell us your new address in a separate letter.

If you are unable to trace one or more of the current permit holders please see below under the transfers declaration.

I declare that the information in this application is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted. I confirm that my standard facility will fully meet the rules that I have applied for (this only applies if the application includes standard facilities) Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well) Tick this box if you do not want us to use information from any ecological survey that you have supplied with your application (for further information please see the guidance notes on part F1) Title (Mr, Mrs, Miss and so on) First name Last name on behalf of (if relevant; for example, a company or organisation and so on) Position (if relevant; for example, in a company or organisation and so on) Today's date (DD/MM/YYYY)

For transfers only – declaration for person receiving the permit

A relevant person should make the declaration (see guidance notes on part F1). An agent acting on behalf of an applicant is NOT a relevant person.

I declare that the information in this application to transfer an environmental permit to me is true to the best of my knowledge and belief. I understand that this application may be refused or approval withdrawn if I give false or incomplete information.

Note: If you cannot trace a person or persons holding the permit you may be able to transfer the permit without their declaration as above. Please contact us to discuss this and supply evidence in your application to confirm you are unable to trace one or all of the permit holders.

If you deliberately make a statement that is false or misleading in order to get approval you may be prosecuted.

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5 Declaration, continue	ed				
Tick this box to confirm that you understand and agree with the declaration above, then fill in the details below (you do not have to provide a signature as well) Name					
Title (Mr, Mrs, Miss and so on)					
First name					
Last name					
on behalf of (if relevant; for exar and so on)	nple, a company or organisation				
Position (if relevant; for example and so on)	e, in a company or organisation				
Today's date (DD/MM/YYYY)					
Now go to section 6					
6 Application checklist	(you must fill in this sectio	n)			
submit your application.	te we will return it to you. If you are	n't sure about w	hat you need to send, speak to us before you		
You must do the following:	form that are relevant to you				
Complete legibly all parts of this and your activities	form that are relevant to you				
Identify relevant supporting info it with the application	rmation in the form and send				
List all the documents you are self necessary, continue on a sepa also needs to have a reference n it in the table below	rate sheet. This separate sheet				
For new permits or any changes that meets the standards given it					
Provide a supporting letter for a confidential	= '				
Get the declaration completed b (not an agent)	y a relevant person				
Send the correct fee					
Question reference	Document title		Document reference		
Question reference	Document title		Document reference		

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7 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

General enquiries: 03708 506 506 (Monday to Friday, 8am to 6pm)

Textphone: 03702 422 549 (Monday to Friday, 8am to 6pm)

Email: enquiries@environment-agency.gov.uk

Website: www.gov.uk/government/organisations/environment-agency

If you are happy with our service, please tell us. It helps us to identify good practice and encourages our staff. If you're not happy with our service, please tell us how we can improve it.

Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily.

8 Where to send your application (for how many copies to send see the guidance note on part F1)

Please send your filled in application form to:

For water discharges by email to PSC-WaterQuality@environment-agency.gov.uk

For waste and installations by email to PSC@environment-agency.gov.uk

Ωr

Environment Agency Permitting and Support Centre Environmental Permitting Team Quadrant 2 99 Parkway Avenue Parkway Business Park Sheffield S9 4WF

Do you want all information to be sent to you by email?

Please tick this box if you wish to have all communication about this application sent via email (we will use the details provided in Part A) \Box

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Feedback

(You don't have to answer this part of the form, but it will	help us improve our forms	if you do.)		
le want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any omments you may have about this form or the guidance notes that came with it.				
How long did it take you to fill in this form?				
We will use your feedback to improve our forms and guid	ance notes, and to tell the (Government how regulations could b	oe	
made simpler.				
Would you like a reply to your feedback?				
Yes please				
No thank you				

Crystal Mark 19132 Clarity approved by Plain English Campaigr	>
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For Environment Agency use only	
Date received (DD/MM/YYYY)	Payment received?
	No 🗆
Our reference number	Yes ☐ Amount received
	_ f

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SUMMARY OF ENVIRONMENTAL MANAGEMENT SYSTEM

Revision: R0 1 | Page



Environmental Management System POLICY MANUAL

Rathlin Energy (UK) Limited

David Montagu-Smith Chairman of the Board November 2018

This document sets out Rathlin Energy (UK) Limited's Environmental Management System (EMS). It highlights the systematic approach in the way Rathlin Energy (UK) Limited manages its business activities and the belief that our performance can always be improved over time. The management system integrates environmental performance into our day to day business activities and is the key to successful environmental management.

Rathlin Energy	Applies To: Rathlin Energy (UK) Limited	RE-02-002
Prepared By: Tony Fildes	Uncontrolled, If Printed	Rev: 5.00

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CIRCULATION LIST

This Policy Manual is a controlled document. The Rathlin Energy (UK) Limited HSE Advisor must ensure that all amendments are circulated and obsolete copies are removed and filed.

This Policy Manual is held on the Rathlin Energy (UK) Limited server and distributed to the following personnel by the Rathlin Energy (UK) Limited HSE Advisor.

Copy No:	Recipient:	Position:	Location:
Master	Caroline Foster	Operations Engineer	Rathlin Beverley Office
1	David Montagu-Smith	Chairman of the Board	Rathlin Server
2	Tom Selkirk	Country Manager	Rathlin Server
3	Jonathan Foster	HSE Manager	Rathlin Server
4	Tony Fildes	HSE Advisor	Rathlin Server
5	Mat Martin	Construction Manager	Rathlin Server
6	Sean Smart	HSE Advisor	Rathlin Server
7	Stephen Croft	Field Technician	Rathlin Server
8	Andrew Sloan	Wells Manager	Rathlin Server
9	Katie Dawson	Office Administrator	Rathlin Server
10			

All employees shall have access to this Policy Manual held on the Rathlin Energy (UK) Limited server under the control of the Rathlin Energy (UK) Limited Operations Engineer.

Printed copies of this document, other than those listed above, will not be revised. As a result, such copies are considered "Uncontrolled Copies" and shall be marked accordingly.

AMENDMENT HISTORY

This document is amended by the distribution of new revisions of all or part of Policy Manual to the personnel detailed within the Circulation List. The history of amendments is recorded below.

Date:	Revision	Section / Page	Reason	New Revision	Authorised
	No:	No. Revised:	for Revision:	No:	By:
01/01/2012	0	All	First Issue	1	JFo
26/02/2014	1	All	Management Review	2	JFo
19/12/2014	2	All	Management Review	3	JFo
02/02/2016	3	All	Management Review	4	JFo
26/11/2018	4	All	Management Review	5	JFo

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FOREWARD

Rathlin Energy (UK) Limited recognises the importance of an effective Environmental Management System (EMS) which contributes significantly to the company's long-term business strategy.

This document sets out Rathlin Energy (UK) Limited's Environmental Management System (EMS). It highlights the systematic approach in the way Rathlin Energy (UK) Limited manages its business activities and the belief that our performance can always be improved over time. The management system integrates environmental performance into day to day business activities and is the key to successful environmental management.

The application of its processes, interactions and implementations, requires participation and commitment from personnel throughout the organisation and contractors at all levels.

It is imperative that everyone involved in the business of Rathlin Energy (UK) Limited familiarise themselves fully with their roles and responsibilities within the document to ensure there is a unified effort and commitment. Only by total commitment by everyone can we ensure a positive organisational culture and the best possible protection of our employees, contractors, the public, our assets and the environment.

Rathlin Energy (UK) Limited Corporate HSE Policy is contained in (RE-01-001) and the Environmental Protection Policy is contained in (RE-01-002).

David Montagu-Smith

Chairman of the Board

Rathlin Energy (UK) Limited

David monly. Suy

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1. Terminology

Term	Use of Term Infers	Dispensation for Area Covered by Term All dispensations are to be recorded and retained in the Management of Change Form (RE-05-FO-001)
Must	Legislative Requirement.	No dispensation can be granted. Inform Chairman of the Board.
Shall	Minimum requirement stipulated across assets/sites.	Approval by Country Manager
Should	UK Best Practice or Recommended/Preferred option	Approval by Divisional Manager or HSE Manager

2. Purpose

The purpose of this document is to enable Rathlin Energy (UK) Limited (Rathlin Energy) to develop and implement a policy and objectives that take account of legal requirements and other requirements to which Rathlin Energy subscribes. This is in line with the requirements of the International Standards Organisation (ISO) 14001 Environmental Management System (EMS).

The 'other requirements' to which Rathlin Energy subscribes include the Safety Management System (SMS), other Rathlin Energy practices, Environmental Agency (EA) legislations, Planning permissions and consents, commitments to partners in joint ventures and corporate obligations such as annual environmental reporting.

This document should be read in conjunction with the site specific Environmental Plan (RE-04-006) and the site specific Health and Safety Plan as required under the Borehole Sites and Operations Regulations (BSOR) 1995.

3. Scope

This document applies to all Rathlin Energy's operated sites and facilities in the United Kingdom involved in exploration, production, transportation, processing and storage of hydrocarbons and all contractors who work on these sites. It also includes all aspects within British Standard (BS European Norm (EN)) ISO 14001 that are deemed to be applicable.

Contractor-operated facilities will be managed in accordance with contractor management processes.

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3.1 Definitions

Environment

Surrounding in which Rathlin Energy operates, including air, water, land, subsoil, natural resources, flora, fauna, humans, and their interrelation.

Environmental Aspect

Elements of Rathlin Energy activities, products or services that can interact with the environment. A significant environmental aspect can, or has the potential to, have a significant environmental impact.

Environmental Impact

Any change to the environment, whether adverse or beneficial, that is wholly or partially resulting from Rathlin Energy environmental aspects.

Environmental Management System

Environmental Management System used to develop and implement its environmental policy and manage its environmental aspects.

Environmental Objective

Overall environmental goal, consistent with the environmental policy, that Rathlin Energy sets itself to achieve.

Environmental Performance

Measurable results of the management of Rathlin Energy environmental aspects.

HSE Policy

Overall intentions and direction of Rathlin Energy related to its environmental performance, as formally expressed by the Chairman of the Board.

Environmental Target

Detailed performance requirements, applicable to Rathlin Energy arising from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Internal Audit

Systematic, independent of the site and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria set by Rathlin Energy are fulfilled.

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4. Environmental Management System Requirements

4.1 General Requirements

Rathlin Energy <u>shall</u> establish, document, implement, maintain and continually improve an EMS in accordance with the requirements of ISO 14001 and <u>shall</u> determine how it will fulfil these requirements.

4.2 Environmental Policy

Aim

The Environmental Policy directs Rathlin Energy in its overall goal of meeting 'no damage to the environment' and also meets ISO 14001 Requirement 4.2 Environmental Policy, through committing to:

- Preventing pollution;
- Continual improvement of environmental performance;
- Compliance with applicable legal requirements and with other requirements to which Rathlin Energy subscribes;
- Rathlin Energy HSE Policy (RE-01-001);
- Rathlin Energy Environmental Protection Policy (RE-01-002).

Process

The following sub-heading describes the responsibilities for the development and review of the policy, with details of how it is communicated both internally and externally.

Policy Development

The policy is developed by the Chairman of the Board, on behalf of the Rathlin Energy Board, incorporating best industry practices and to be applicable to all assets/sites.

Policy Review and Publication

The annual management review considers whether policy needs updating to support the outputs of the review. The policy will also be reviewed whenever a significant change occurs including:

- A change in senior management;
- A change in the structure of the organisation;
- A change in the scope of Rathlin Energy activities or key environmental issues.

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The policy will not typically require changes in light of legislative changes, environmental incidents or particularly good or bad environmental performance, as the policy statement is necessarily a high level document. The policy is published in the annual environmental statement and will be made available on request from any member of the public. The process for communicating the policy and making it publicly available are described further in Paragraph 4.4.3.

4.3 Planning

4.3.1 Environmental Aspects

Aim

This paragraph details the process that enables the initial identification of the relevant environmental aspects and the level of significance of identified aspects to be evaluated. It comprises a basic environmental risk assessment methodology:

Environmental Significance = Severity x Likelihood

The process is designed to enable management to make an informed decision regarding the importance of environmental issues and objective professional judgement **should** be used. This ensures that the outcome reflects the importance to the business of the issues concerned.

Each Asset/Site will maintain a site-specific environmental aspects register.

Risk Management

The first step towards achieving the Rathlin Energy aim of 'no damage to the environment' is to understand what effects our activities have, or might have, on the environment. This is achieved through identification and significance testing of the aspects of Rathlin Energy operations that can or could result in environmental impacts. This enables us to identify those environmental aspects that need to be managed within the EMS and need to be considered when setting environmental objectives and targets.

A requirement of this Paragraph 4.3 is to comply with:

ISO 14001 Requirements 4.3.1 Environmental Aspects

Process

Identification

Prior to operations beginning on a new asset/site, a workshop/brainstorm session involving key representatives from across the business must identify areas where operations and activities can interact with the environment. This is sometimes referred to as an Environmental Impact Identification (ENVID).

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All sources of actual and potential environmental impact <u>shall</u> be comprehensively identified, including potential non-routine and emergency situations. The review <u>shall</u> include, but not be limited to, the following considerations.

Global climate change and air quality	Cumulative impacts
Water and sediment quality	Habitats and species conservation
Waste disposal	Operations
Physical presence of facility	Liability management
Oil spill and emergency planning	Resource use

Evaluation of Significance

Once the aspects have been identified, they are then evaluated for their significance using the process outline below:

(1) Environmental issues will be reviewed, with the severity of the potential associated impacts assessed using Table 1 as a balance between the following;

(a) Environmental Consequence

For a risk assessment, this can be broadly summarised from scientific evidence, for example, laboratory studies indicating toxic effects which are demonstrated in the field etc.

(b) Non-financial Impact

Policy drivers may be driven by current legislation, operating licences, operational permits and consents, and company practices, procedures and targets etc.

- (2) Consider the likelihood of the impact occurring, using Table 2.
- (3) Use the simple matrix of severity and probability (refer to Table 3) to determine the significance of the overall impact.

Environmental Aspects Register

The outcome from the identification and evaluation process shall be recorded in the Environmental Aspects Register(s) (RE-05-LOG-015).

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Rating	Environmental Consequence	Stakeholder Factors	Regulatory/Policy Driver
Major	Actions/operations result in the quantifiable degradation or loss of habitats of flora and fauna, ecological systems, and property, where the recovery would not be achieved until several years following the cessation of the activity. Impact on the status and health of internationally or nationally protected sites, habitats or human beings.	Documented and widely held concerns in society and the scientific community, including perception of threats to the global environment. Decrease, or perceived decrease, in the availability or the quality of resources to the extent of affective the long-term wellbeing of the persons utilising or benefiting from the resource. Will have an effect on human	Actions/operations result in the breach of UK/EU legislation that results in a fine or court proceedings.
Moderate	Actions/operations result in the quantifiable degradation or loss of habitats of flora and fauna, ecological systems and property where the recovery would clearly be underway within 1 to 2 years following the cessation of the activity. Impact on locally protected or important sites, habitats or health of human beings.	health. Local concerns at the community or broad interest group level. Decrease, or perceived decrease, in the availability or the quality or a resource to the extent of affecting the short-term wellbeing of the persons utilising or benefiting from the resource. Possible, but unlikely effects on human health.	Actions/operations result in the breach of Rathlin Energy performance contracts. Impact on corporate goals and targets on specific activities, beyond regulatory requirements.
Minor	Actions/operations result in the potential degradation of habitats of flora and fauna, ecological systems and property where total recovery would be achieved within 1 year following the cessation of the activity. Impact on individual organisms within specific ecosystems.	Issues that may affect individuals, single businesses and single interest groups at a local level. A temporary decrease, or perceived, in the availability or the quality or a resource affecting the wellbeing of local person utilising or benefiting from the resource.	Actions/operations result in the breach of individual performance contracts.
Negligible	Effects on actions/operations are not measurable from background variation.	A slight decrease in the availability or the quality of a resource that is unlikely to be noticed by the persons	Actions/operations result in slight impairment of corporate

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			utilising it	environmental image or policy
I	Positive	An enhancement in some	An enhancement in the	Enhancement of
		ecosystem or population	availability or the quality of a	corporate
		parameters.	resource(s) benefiting persons	environmental image
Į			utilising it.	or policy

Table 1 Severity Matrix

Probability Rating	Routine (Planned) Operation Frequency	Probability
5	Continuous, over several years	Likely > one per year
4	Regular, intermittent over each year; typical one per year	Possible > one in 10 years
3	Regular, intermittent, every 2 to 5 years	Unlikely > one in 100 years
2	One-off event, over several days	Remote > one in 1000 years
1	One-off event, up to 1 day in duration	Extremely remote > one in 10,000 years

Table 2 Categories for Assessing Likelihood

Probability		Consequence Rating			
Rating	Major	Moderate	Minor	Negligible	
5					
4					
3					
2					
1					

Final Significance Rating					
High	High Medium Low				

Table 3 Categories for Assessing Environmental Probability

Review

On an annual basis, or as required through the Management of Change Standard (RE-03-003), a review of the relevant Environmental Aspect Register will take place. The review **should** be attended by a representation of the personnel from the Asset/Site. The review will identify any changes to the operations, or impacts that **should** be captured in the Environmental Aspect Register.

For major changes to the aspects or additions to the scope, such as new projects, this environmental aspects process **should** be used. This will identify the aspects and then assess their significance. Where appropriate, the findings will be fed into the operational control procedures.

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4.3.2 Legal and Other Requirements

Aim

This paragraph sets out how Rathlin Energy identifies applicable legal and other requirements, in relation to our environmental aspects. It also details how Rathlin Energy ensures compliance, particularity with legal requirements.

The Rathlin Energy Legal Register (RE-05-LEG-001) sets out regulatory HSE compliance.

A requirement of this Paragraph 4.3.2 is to comply with ISO 14001 Requirements 4.3.2 Legal and Other Requirements.

Process

The process comprises the identification of legislation, and other requirements, the management of permits and consents and the evaluation of compliance.

Identification of Legislation

The primary method for identifying legal and other requirements is a quarterly review of information provided by the HSE Advisor. In addition, to this primary method, the following is used:

- Consultation with regulators;
- Environmental/Project HSE/other functions network meetings;
- Attendance at conferences and workshops;
- Membership of professional bodies, e.g. the institute of Environmental Management and Assessment (IEMA) and Institute of Occupational Safety and Health (IOSH).

Environmental Legislation Register

The Rathlin Energy Legal Register (RE-05-LEG-001) is reviewed, updated and audited on a regular basis.

Legal Compliance

Within each asset/site, processes **shall** be in place to identify the regulatory permits required and to ensure that permit applications are submitted in a timely manner.

Consents and Permits Register

The Asset, Consents and Permits Register (RE-05-LOG-003) will be reviewed and updated periodically and will be used to identify when renewals are required. The register contains the following information, as a minimum:

Type of asset, consent and / or permit

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- Valid from date
- Expiration date

In addition to the register, each asset/site <u>shall</u> retain hardcopies of the consents and permits, display hardcopies of the relevant consents/permits on site and, provide electronic copies for the asset/site server if necessary.

Obtaining Consents and Permits

The HSE Advisor is responsible for obtaining environmental consents and permits and will seek the Country Manager (or their delegate's) assistance with site specific content.

On receipt of any permit or consent, the Country Manager, with input from the HSE Advisor, **shall** ensure that the permit accurately reflects the application. It is the Country Manager responsibility to ensure that the new consent/permit is communicated within the asset/site and that all permit conditions are met. The HSE Advisor **should** provide support and advice as required.

Conformance with Other Requirements

Where 'other requirements' have been identified, these are incorporated into annual objectives and targets, asset plans and monitoring schedules in accordance with the processes described in Paragraphs 4.3.3 and 4.5.1.

Evaluation of Compliance

Compliance with permit/consent limits will be checked at an appropriate frequency by the HSE Advisor, as he submits environmental data and reports on asset/site performance.

Checks on compliance are also included in Paragraph 4.5.3.

4.3.3 Objectives, Targets and Programmes

Aim

This paragraph details how Rathlin Energy sets objectives, targets and environmental programmes to deliver continual improvements in environmental performance. This is to ensure that the Rathlin Energy goal of 'no damage to the environment' is pursued.

A requirement of this paragraph is to comply with ISO 14001 Requirements 4.3.3 Objectives, Targets and Programme(s).

Process

Define Rathlin Energy Environmental Activities

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The Rathlin Energy environmental activities are set in line with the business planning process.

When establishing and reviewing the environmental activities, the following will be taken into consideration:

- Current and future legal and regulatory requirements and 'other' requirements;
- Individual site's environmental performance;
- All significant environmental aspects and impacts, including any changes due to new or altered procedures or plant;
- Opinions, concerns and requirements of interested parties;
- Financial, operational and other matters, as appropriate;
- Likely new projects, which might occur inside the next planning cycle;
- Behavioural safety programmes and Hazard Report Form (HRF) cards.

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibility and Authority

Aim

This paragraph defines the organisational structure that allows Rathlin Energy to establish, implement, maintain and improve the Environmental Management System (EMS).

A requirement of this paragraph is to comply with ISO 1400 Requirement 4.4.2 Resources, Roles, Responsibility and Authority.

Role and Responsibilities

The following matrix shows roles and responsibilities relating to the EMS.

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							Clause							
Role	4.2 Policy	4.3.1 Aspects	4.3.2 Legal and Other Requirements	4.3.3 Objectives, Targets and Programmes	4.4.1 Resources, Roles, Responsibilities and Authority	4.4.2 Competence Training and Awareness	4.4.3 Communication	4.4 Documentation, 4.4.5 Control of Document, 4.5.4 Control of Records	4.4.6 Operational Control	4.4.7 Emergency Preparedness and Response	4.5.1 Monitoring and Measurement, 4.5.2 Evaluation of Compliance	4.5.3 Non- conformity and Corrective and Preventative Action	4.5.5 Internal Audit	4.6 Management Review
Chairman of the Board	Endorsement of the policy Development and review of policy Scheduling policy annual/other reviews Implementing changes to policy				Ensure sufficient resources are available to implement, maintain and improve the EMS.			Ownership of environmental documents.						Attend and provide input at the annual management review.
Country Manager			Ensure assets/sites are in compliance with relevant legislation through the provision of adequate competent resources.	Accountable for: Ensuring that Rathlin Energy environmental requirements are included in asset specific objectives and targets within the asset plan.			Ensure polices and environmental requirements are communicated to all employees and contractors.		Ensure implementation of operational control.			Encourage all personnel to identify and communicate non-conformances		Hold a management review of the EMS annually.
Divisional Managers		Review aspects register with cross-section of asset team. Ensure aspects register is filed appropriately and is readily available	Maintain consents and permits register Provide the Operations Manager with support required for the environmental elements of consent/permit preparation and submission.	Provide support to the Operations Manager in delivering the environmental requirements of the plan.	Implement and maintain asset/site level processes and documentation.	Responsible for promoting training and seeking assurance that it is being undertaken for the asset/site.	Communicate: Relevant legal and other requirements to the site Key EMS structure and responsibilities to the site Site environmental performance, findings from audits/inspections, non-conformances in relation to Rathlin Energy (UK) Limited performance and management review outcomes	Ensure that all EMS asset/site specific documentation: • Is held within the asset/site document control system • Has an identified owner and a defined periodicity date	Drive implementation of, and conformance with, operating control procedures related to key environmental systems.	Ensure that: The emergency plans are kept up to date for operations, drilling and new projects.	 Identify which aspects will be monitored and measured and communicate to the site. Seek assurance that monitoring and reporting that is related to regulatory compliance is carried out Seek assurance that consent and permit conditions are complied with at all times. 	Ensure all environmental non-conformances are recorded in the action tracker (RE-05-LOG-001)	Ensure that: Logistics have been arranged for the audits Actions are entered into the action tracker (RE-05-LOG-001) and closed out.	Organise and minute the asset/site level management review Track progress against actions resulting from the asset/site level management review Provide the minutes, including actions to the EMS Single Point of Accountability (SPA) Review and update asset level objectives and targets.

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	1	T		T	1	1	T		
HSE Advisor		Maintain the legislative		Liaise with national			• Identify	Carry out	
1		register and ensure periodic		and international	1		potential risks	audits in line	
		reviews are undertaken		government			associated with	with	
		according to the reviewed		departments and	1		emergency	procedures	
		procedures.		non-government	1		conditions,	Communicate	
				organisation,			including	the scope of	
				pressure groups, the			release of	the audit to the	
				public and the			hydrocarbons	site	
				media.			Make the Site		
				media.			Supervisor	Review	
							aware of these	previous audits	
								conducted at	
							risks, to ensure	the site prior to	
							that they are	the audit	
							incorporated in	• Ensuring the	
							relevant	report is	
							emergency	entered into	
							response plans.		
								the server by	
								sites and	
1	1				1			actions	
1	1				1			distributed.	
								Approving	
	1				1			action close-	
1	1				1			out and	
1					1			providing	
								challenge	
								where close-	
								out is	
								insufficient.	
								Ensuring the	
								final report is	
								filled in with	
								the	
								corresponding	
								report number	
								(see RE-03-	
	 	- "			- "			001).	
HSE Manager or	Ensure annual	Responsible for	EMS focal point and	Communicate the	Responsible for:	Ensure that the	Provide assistance	Ownership and	Attend and
delegate	review of	ensuring the site	responsible for	following:	 Allocation of 	defined Rathlin	and guidance in	maintenance of	support the
	aspects	specific	establishing,	Rathlin Energy	document	Energy practices	update and	the internal	Chairman of the
	register	environmental plan	implementing and	environmental	owners	and processes are	approval of	auditing	Board at the
		adequately covers	maintaining the EMS	requirements and	 Ensuring that 	communicated to	Emergency Plans,	schedule	annual
		environmental	across the	plan	reviews are	all sites/assets.	co-ordinating this	Facilitation of	management
		activities.	sites/assets.	Rathlin Energy	undertaken	•	process if	audit teams for	review
	1		,	(performance,	within each		required.	all internal	Consolidate
	1			significant	document's			audits	
1	1			findings from	defined			Advising	asset/site level
	1								management
1	1			audits or	periodically			auditor of areas	reviews for the
				inspections and				of focus for the	Corporate
	1			environmental	1			year	annual
	1			non-	1			Ensuring audits	management
	1			conformances	1			reports are kept	review
1	1			Rathlin Energy	1			and available	Track progress
	1			annual	1			for sharing	
				environmental				Analysing audit	from the
]				statement				data and	management
	1				1				reviews
	1			Key EMS structure	1			communicating	 Keep records of
	1			and	1			system risks	all management
				responsibilities to	I	1		Facilitation of	
1				l l					review for
				the Site				external audits	review for minimum 5
				the Site Supervisor					minimum 5 years

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Site Supervisor	Ensure that the following Responsible for:	Ensure	• Test the	Manage non- Ensure that	Attend the
	are undertaken: Delivering the	implementation		conformances in sufficient priority	
	Populate consents and environmental	of site specific	•	heir area of is placed on	annual
	permits register activities contained	operational		esponsibility. undertaking	management
		controls.		environmental	reviews.
	· · · · · · · · · · · · · · · · · · ·	controis.	• Record		reviews.
	of consents/permits and		learning's from	audits.	
	if necessary, provide		the exercises on		
	electronic copies		the server.		
	Notify the Operations		Ensure the		
	Manager when		appropriate		
	expiration is due and		level of		
	seek assistance in a		environmental		
	timely manner		training across		
	Apply to the relevant		the site is up to		
	authority in a timely		date.		
	manner for				
	consents/permits, to				
	ensure an adequate				
	consultation period can				
	be undertaken				
	Issue consents/permits				
	to ensure awareness of				
	the conditions across				
	the site				
	tile site				J

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Process

Organisational Structure

The overall responsibility for the Rathlin Energy EMS is held within the Rathlin Energy Management Team. This team comprises the Chairman of the Board, Country Manager and their delegates.

Under the Rathlin Energy Management Team, the responsibilities for establishing, implementing and maintaining the EMS lies with the Rathlin Energy Compliance and Environment Team made up by the HSE Manager, HSE Advisor and Operations Engineer.

In addition, Rathlin Energy expects the participation, commitment and involvement of personnel within Rathlin Energy. All staff are responsible in ensuring that environmental matters are satisfactorily managed within Rathlin Energy.

Organisational Capability

It is the responsibility of senior management to ensure that resources are available to establish, implement, maintain and improve the EMS. This is achieved by the annual organisational capability review, which identifies future resources and actions that are required.

The HSE Manager is the Rathlin Energy EMS Single Point of Accountability (SPA). The Rathlin Energy selection process will ensure that this position is filled by a competent person.

4.4.2 Competence, Training and Awareness

Aim

This paragraph outlines how Rathlin Energy is assured that it has the necessary competence, training and awareness to deliver the commitments in the environmental policy and to achieve the annual objectives and targets.

A requirement of this paragraph is to comply with ISO 14001 Requirement 4.4.2 Competence, Training and Awareness.

Process

The process involves:

- Identification of training needs to develop the appropriate environmental competency;
- Delivery and evaluation of training;

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Identification of Training

The training matrix in HSE Training Standards (RE-05-FO-023) defines roles against training modules, based upon the responsibility and importance of the role with regards to the potential to cause environmental harm.

Training Delivery

These are standard classroom based and site based training courses listed below. In addition to these, and to address specific training needs, other forms of training may be used for example:

- Inductions for Turnarounds (TARs)/Projects/Drilling Campaigns;
- Toolbox Talks;
- Safe System of Works;
- Environmental Hazard Identification and Reporting Training.

Environmental Classroom-based Training (CBT) and Site-based Training

These include, but not limited to the following:

- Control of Substances Hazardous to Health (COSHH) Training;
- Environmental Awareness Training;
- Emergency Response Training;
- H₂S Training;
- Environmental spills and clean up Training;
- Confined Space Entry Training;
- Environmental legislation Training;
- EMS auditing Training;
- Waste Management Training.

Training Evaluation

The evaluation of individual training is undertaken through the following processes:

- Competence management will identify the training requirements of individuals managed by the HSE Advisor.
- Excellence programme will provide a roadmap of expected qualifications and competencies for environmental professionals.

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4.4.3 Communication

Aim

This paragraph sets out how the Rathlin Energy communicates on environmental management issues, both internally and externally. A requirement of this paragraph is to comply with ISO 14001 Requirement 4.4.3 Communication.

Process

Internal Communication

Internal communication will be circulated to Rathlin Energy employees in writing or via e-mails.

The formal process for internally communicating legislation, compliance and performance is through the annual management review at Paragraph 4.6, which takes place at Asset/Site and Corporate Leadership Team Levels.

In addition to management reviews the following tools are used for internal communication and data management:

- Regular Health, Safety, and Environment (HSE) meetings at an asset/site level;
- Environmental Reporting;
- Internal updates on changes in legislation;
- Daily site meetings;
- Annual environmental forum for communications with site representatives;
- Email and other forms of internal correspondence;
- Annual environmental statement prepared for Rathlin Energy;
- Records of internal communications can be stored on the server and other storage facilities;
- Action tracker used to report and monitor data relating to environmental incidents such as spills and material releases.

External Communication

Communications directly between Rathlin Energy Asset/Site and external groups occur with:

- Statutory and regulatory bodies;
- Vendors and contractors;
- Emergency organisations.

Statutory and Regulatory Bodies

Communication with regulators generally occurs at two levels:

(1) Strategic and policy issues

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(2) Operational issues

Strategic and policy issues are communicated externally by the Country Manager and / or the HSE Manager in liaison with the Chairman of the Board. Operational issues may be communicated by appropriate site personnel directly with the applicable external party, with the support of the HSE Advisor as required.

Performance information is communicated to regulators by the Compliance and Environment Team as required by applicable site Permits and Consents. In addition, environmental performance review meetings are held with government agencies as required.

Communication that has a realistic potential for being used in legal proceedings **shall** be approved by the HSE Manager and Country Manager before issue.

Vendors and Contractors

Communications with a range of external organisations is required in environmental emergency situations. These arrangements are detailed in the relevant site Health and Safety Plan, Emergency Response Plan Offsite (RE-04-004) and Emergency Response Plan Onsite (RE-04-005).

Emergency Organisations

Communication with a range of external organisations is required in environmental emergency situations. These arrangements are detailed in relevant procedures and in line with site specific operations.

Other External Communication

Liaison with National Governmental departments and Non-Government Organisations (NGOs), pressure groups and the public is typically carried out by the Country Manager and HSE Manager. Prior to communicating with media (including statements, interviews and press releases) the Divisional Manager seeks advice from the Country Manager or Compliance and Environment Team.

External communications such as those from government departments, NGOs or other parties with concerns are directed to, and managed at, a Managerial level. All environmental complaints are acknowledged and investigated, and an appropriate response made in a timely fashion. Complaints are initially assessed by the appropriate Divisional Manager, who then liaises with the Country Manager, as required, in determining an appropriate response. All responses **shall** be endorsed by the relevant Divisional Manager.

Following a complaint from an external party, details <u>must</u> be recorded along with any required actions entered into the Action Tracker (RE-05-LOG-001). Once entered, actions are tracked until they are closed by the responsible party.

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4.4.4 Documentation and Records

Aim

The purpose of this paragraph is to define what documentation needs to be available and to whom, processes for storing and maintaining documentation relating to Rathlin Energy EMS. It also shows how Rathlin Energy controls environmental records to ensure sufficient information is obtained to assess compliance with its EMS and to continue to learn lessons from past experiences.

A requirement of this paragraph is to comply with:

• ISO 14001 Requirements 4.4.4 Documentation, 4.4.5 Document of documents and 4.5.4 Control of Records

Process

Document Control

The Document Control Procedure (RE-03-001) describes how the EMS documents are maintained, reviewed and updated. Each document will clearly state the document owner and the revision date.

Consents, Permits and Other Requirements

Copies of all Permits, Consents and Licences **shall** be held in a central location for a minimum of 3 years. Electronic copies can also be held on servers at the discretion of the Divisional Manager.

Other regulatory correspondence will be held in accordance with the Document Control Procedure (RE-03-001).

Environmental Aspects Register

An electronic copy of the Asset Environmental Aspects Register (RE-05-LOG-015) **shall** be held in a central location that is accessible by all relevant personnel as per Paragraph 4.3.1.

Training Records

Records of environmental training **shall** be recorded within the Rathlin Energy Training Matrix (RE-05-FO-023)

When training is provided, paper certificates or letters **should** be held by the individual.

4.4.5 Environmental Operational Control

Aim

This paragraph details the processes in place for ensuring that operations are conducted in such a way as to minimise environmental impact and to facilitate continuous improvement.

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Good Practice

A requirement of this paragraph is to comply with:

- ISO 14001 Requirement 4.4.6 Operational Control
- Operational control of the environmental management system is managed through a number of Level 3 Standards and Procedures and Site Specific Documentation and other guidance documents.

These documents include:

- Site Specific Environmental Plan;
- Site Rules (RE-04-001);
- Site Induction (RE-04-003);
- Emergency Response Plan Offsite (RE-04-004);
- Emergency Response Plan Onsite (RE-04-005);
- Legal Register (RE-05-LEG-002);
- Environmental Aspects Register (RE-05-LOG-015);
- Site Specific Health and Safety Plan (RE-05-BSOR-##);
- Site Specific Bridging Document (RE-05-BRG-##);
- Well Design and Operations Standard (RE-03-009);
- Written Scheme For Independent Well Examination (RE-05-WES-001);
- Consents and Permits Register (RE-05-LOG-003);
- Action Tracker (RE-05-LOG-001);
- Audit Scope Checklist (RE-05-CHK-006);
- Housekeeping Checklist (RE-05-CHK-007);
- Audit Report Form (RE-05-FO-019);
- Training Matrix (RE-05-FO-023);
- HSE Objectives and Targets (RE-05-FO-024).

4.4.6 Environmental Control Arrangements

During induction to the asset/site and as part of task specific risk assessments, all personnel **shall** be made aware of 'spill kit' locations and how to check and replace these items if used. Drip trays **shall** be used and spill kits present at all times when plant is being used, such as portable generators. All fuels **shall** be stored in such a way to contain any spills.

This will be within an impermeable bund, or mobile fuel bowser with a secondary containment system (double skin bund). All mobile bowsers **should** also be sited on an impermeable barrier such as "visqueen" sheeting.

In the event of an environmental spill the procedure **shall** be:

STOP NORMAL WORK immediately;

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- If spillage is flammable, remove or extinguish all possible sources of ignition;
- Identity the sources of pollution and if possible isolate the source;
- Put on appropriate PPE;
- Contain the spillage using earth/sand to construct a bund around the spill to stop it spreading or where available use the spill kit;
- Protect sensitive areas (e.g. watercourses or surface water drains, use drain covers or use earth/sand to construct a bund);
- Contact the Project Manager immediately;
- Clean up the spill. Use absorbent granules/pads to soak up the spill. Large pools of oil or spills which cannot be absorbed should be removed using a gulper;
- Dispose of all contaminated material (soil/absorbent material) correctly, those containing substances such as oil, diesel or paint will be hazardous waste;
- Never wash or hose a spill into the drainage system. Always use absorbent materials.

The Site Supervisor **shall** take all reasonable measures to ensure that:

- Any release is contained and that harm to human health and the environment is minimised, both within and beyond the site boundary;
- Once the release has been contained, any environmental damage is appropriately remediated (with advice from the Environmental Agency if required);
- Contaminated clean up materials are handled, stored and disposed of as hazardous waste in accordance with the Hazardous Waste (England and Wales) Regulations 2005;
- Environmental incidents are fully investigated. Such investigation with help from the HSE Advisor and Divisional Manager <u>shall</u> determine:
 - (i) Whether the incident is of a 'major' or 'minor' nature. Note: all incidents requiring action beyond site boundaries **shall** be classified as 'major';
 - (ii) The cause of the incident;
 - (iii) If existing emergency procedures are adequate or require revising.
- Environmental complaints/incident reports are completed and issued to the Country Manager;
- Any pollution incident classified as 'major' is reported to the relevant regulatory authority (Environmental Agency), as soon as possible;
- Contractors working on behalf of Rathlin Energy are made aware of the contents of this procedure and that they are required to comply with its provisions.

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Pollution Hazard Schedule

POLLUTION HAZARDS	POLLUTION CONTROL MEASURES	
Fuel leaks from plant and	Drip trays to be placed beneath static plant.	
work equipment	Plant/work equipment regularly inspected for defect and records of	
	such inspections to be recorded in the appropriate register.	
Fuel spillage during refueling	Designated refueling area to be established onsite.	
operations	Fuel tanks to be fitted with locks and delivery hose to be kept within	
	bunded tank area when not in use.	
	Spill kit to be provided and kept close to fuel tank.	
	Drip bund to be formed below filler hose.	
	Protective barrier or bund to be installed to prevent impact damage	
	to fuel tank.	
Pollution from delivery	Bespoke washout area to be established on site with suitable	
wagons or washout process	containment system in place	
Pollution from accidental	All hazardous substances to be properly stored in appropriate	
release of hazardous	containers in such a manner as to prevent damage or accidental	
substances	spillage.	
Dust and Noise from	See below	
operational activities		

Potential pollutants include:

Gas Oil (plant fuel) – estimated weekly consumption unknown at this point.

Silted water (surface water run-off and pumped groundwater) quantities unknown at this point.

Other hazardous substances (various) estimated quantities unknown at this point.

Waste Management & Housekeeping

A high standard of housekeeping **shall** be maintained at all times. The Divisional Manager and Site Supervisor will monitor performance throughout the project (RE-05-CHK-007). All waste and packaging will be disposed of as it is generated. Litter is unacceptable and all personnel will be reminded of the requirements to dispose of waste during induction.

Segregated walking routes and roadways **shall** be maintained effectively by road sweeping as necessary.

It is Rathlin Energy's target to reduce the amount of waste being sent to landfill by implementing a hierarchy of control and by segregating waste onsite. The Divisional Manager and/or Site Supervisor **shall** consolidate all transfer and consignment notes and record the information within the Site

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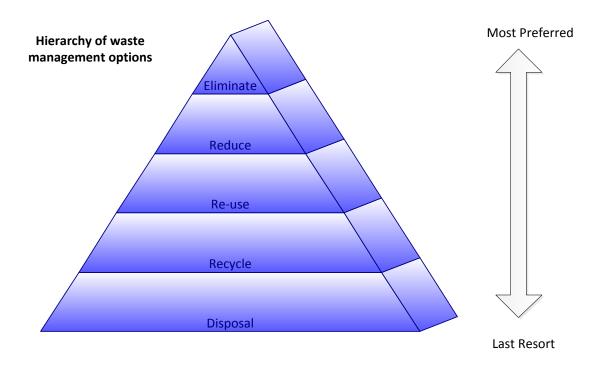
Environmental Plan. Rathlin Energy **shall** endeavor to recycle whatever cannot be re-used and when ordering materials, recycled products will be purchased wherever practicable.

Tools and equipment **shall** not be left unattended and **shall** be stored in the designated areas.

All waste skips, bins and segregating areas **shall** be sited away from temporary site offices. In the event of an accidental fire or fire caused deliberately, this may reduce the risk of fire spreading to other cabins and creating nuisance smoke to the atmosphere.

The Site Supervisor is responsible for the implementation of the Site Environmental Plan on a day to day basis.

The options for waste on site are illustrated as follows:



Eliminate the waste

Every effort will be made to eliminate the waste produced at source. Control measures will include:

- Avoiding packaged materials where practicable;
- Ordering correct quantities;
- Avoiding damage by handling and storing correctly.

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Reduce the amount of waste produced

This includes planning to reduce over ordering of materials, providing suppliers with sufficient information to supply correctly, avoiding damage or deterioration from poor handling or storage methods.

Re-use

Only dispose of waste which cannot economically or practically be re-used or recycled. Materials such as drilling fluids can be readily reused.

Recycle

Waste will be segregated onsite to allow for recycling off site. Additionally, materials that are recycled **shall** be procured for use onsite where practicable and where the specification permits.

Dispose

Waste that cannot be reused or recycled practicably <u>shall</u> be disposed of responsibly and in compliance with Rathlin Energy duty of care obligations. All waste <u>shall</u> be removed from site by a licensed waste carrier to a licensed waste site.

Control of Substances Hazardous to Health (COSHH) & Storage of Materials

COSHH assessments will be produced for any hazardous materials used onsite. COSHH assessments **shall** be appended to the relevant risk assessment and communicated to those people involved with or affected by the tasks, by the Site Supervisor. All fuels or materials with the potential to cause an environmental incident **shall** be stored where any spills can be contained. This will be within an impermeable bund, or mobile bowser with a secondary containment system (double skin bund).

Wherever possible substances will be substituted with nonhazardous alternatives. Where this is not possible Rathlin Energy **shall** apply the hierarchy of control measures as outlined in the Control of Substances Hazardous to Health Regulations 2002.

The quantity of any flammable material stored onsite <u>shall</u> be kept to a minimum to reduce the potential for fire hazard. No fuels <u>shall</u> be stored in any area where surface run-off migrates directly into water drains. All materials <u>shall</u> be stored in stockpiles of reasonable gradient to prevent collapse. The storage area <u>shall</u> be fenced off and secured to exclude trespassers when not in use. All waste materials <u>shall</u> be stored in suitable skips/containers etc. All flammable waste skips <u>shall</u> be stored at least ten metres from any adjacent cabin. The storage area <u>shall</u> be fenced off and secured to prevent unauthorised access where possible. Recovered and waste materials awaiting transport <u>shall</u> only be stored within the site or the site compound. Stored materials <u>shall</u> not obstruct access to any other part of the asset/site.

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Dust & Noise Mitigation

Airborne dust generated by operations will, in general, be controlled by damping down with water. Various techniques will be adopted across the site to reduce the production of dust. Each specific task carried out onsite will have its own standard operating procedure and will detail measures to be taken to reduce the production of dust. It may be that one measure alone will be sufficient for a task or it may require a series of measures to ensure that dust is kept to an acceptable level. All dust suppression methods using water will be done in a controlled manner in order that sufficient water is used to suppress the dust but not excessive quantities that causes run off.

All Site personnel will be aware of the care required to minimise the production of dust and will be informed of this in various forms including, site inductions, risk assessment instruction, tool box talks, time out for safety, and general supervision instruction onsite.

The associated COSHH assessments <u>shall</u> be available to all personnel involved with or affected by the work. Appropriate Personal Protection Equipment (PPE) <u>shall</u> be worn in accordance with the task specific risk assessment.

Appropriate plant and equipment **shall** be utilised to ensure that site noise is kept to a minimum. All work equipment **shall** be adequately maintained to avoid unnecessary noise and be fitted with appropriate working silencers and noise insulation where available. No plant **shall** be left idling. Plant **shall** be sited in such a position so as to reduce noise pollution.

Site personnel <u>shall</u> be reminded of the requirement to keep noise down to an acceptable level during their site induction. Due to the tasks involved in the operation, Rathlin Energy <u>shall</u> choose methods of work and equipment which <u>shall</u> reduce the potential exposure to Site personnel. PPE <u>shall</u> be provided and enforced should the noise levels exceeds 80 and 85 dba respectively. The HSE Advisor will monitor noise levels during the works at various locations across the asset/site.

4.4.7 Emergency Preparedness and Response

Aim

This paragraph specifies the arrangements for key personnel, operating procedures and supporting information necessary for an effective response to potential environmental emergency situations.

Risk Management

A requirement of this paragraph is to comply with:

• ISO 14001 Requirement 4.4.7 Emergency Preparedness and Response

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Emergency response plans set out the procedures for managing responses to environmental incidents. Emergency Response Plan Offsite (RE-04-004) and Emergency Response Plan Onsite (RE-04-005) are the two principle plans for Rathlin Energy.

Process

The responses to most major emergency scenarios in the upstream and business are covered by legal obligations and Rathlin Energy policy, as provided for, for example, in Borehole Sites and Operations Regulations 1995, Incident Investigation and Reporting (RE-03-008), Identification of Health and Safety Risks (RE-03-005), reports and emergency management plans.

Emergency Plans

This contains information on the resources available during spill response, the procedures for contacting external agencies and data on the environmental sensitivities.

Emergency Exercises

The emergency preparedness of the assets/sites <u>shall</u> be regularly tested at all levels of response. All assets/sites <u>shall</u> periodically undertake emergency exercises to test the emergency response plans at the site. Outcomes from these exercises <u>must</u> be recorded and any specific actions taken to improve the response <u>shall</u> be tracked.

Arrangements for responding promptly and effectively to potential emergency situations **should** be tested with sufficient frequency to ensure their continued appropriateness and the competence of personnel regarding their particular responsibilities. Lessons learned from tests or actual incidents **should** be reflected through amendment of relevant procedures and plans.

4.5 Checking

4.5.1 Monitoring and Measurement

Aim

This paragraph details how Rathlin Energy monitors and measures those environmental impacts that have been deemed of medium or high significance. It also details how Rathlin Energy evaluates and tests the compliance with legal and other requirements to which it subscribes.

A requirement of this paragraph is to comply with:

• ISO 14001 Requirements 4.5.1 Monitoring and Measurement and 4.5.2 Evaluation of Compliance

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Process

Area of Performance for Monitoring

It is impractical to monitor and measure all of Rathlin Energy potential and actual environmental impacts; therefore, the focus is on those that qualify by either of these points:

- Have been identified by Paragraph 4.3.1 as being of medium or high significance
- Are specified for measurement through consents and permits, or by other regulatory bodies

Assets/sites **shall** identify their own specific monitoring and measurement requirements. All monitoring data for reporting **shall** be held within the server and be populated by the asset/site.

Monitoring and Measurement Records

Records of internal audits, external audits, inspections and management reviews **shall** be retained electronically, where all relevant personnel have access.

All monitoring and measurement reports that are submitted to regulators **shall** be held by the asset/site for the duration required under specific legislation of Rathlin Energy retention requirements.

4.5.2 Non-conformity and Corrective and Preventative Action

Aim

This paragraph sets out how Rathlin Energy manages non-conformity, in addition to corrective and preventative action.

A requirement of this paragraph is to comply with:

ISO 14001 Requirement 4.5.3 Non-conformity, Corrective Action and Preventive Action

Process

This process describes the methods used for identifying and addressing actual and potential non-conformities within Rathlin Energy.

Identifying Non-conformity

A number of tools are used to identify non-conformities, including:

- EMS audits;
- Safety and Environmental Observations and Conversation;
- Hazard Report Form (HRF) cards;
- External audits and inspections, including regulatory checks.

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Some of these tools are explained in more detail below.

Addressing Non-conformity

Following initial identification of the non-conformity, the necessary actions required to prevent recurrence are agreed with the actionees and, where appropriate, entered into the Action Tracker (RE-05-LOG-001), in accordance with Incident/Accident Reporting and Investigation (RE-03-008).

Regulatory Non-conformity

Managing regulatory non-conformity is specified in the Correction and Preventative Action Standard (RE-03-012).

Monitoring Progress

Where actions have been entered into the Action Tracker (RE-05-LOG-001), the actions are tracked to closure by the responsible party. Once the action is closed out, the originator is informed and is given the opportunity to verify that the action has been closed out to his/her satisfaction.

Management of Change

If any identified non-conformity requires a change of personnel, process or procedure, the relevant Management of Change process will be applied. Changes to the EMS documentation **shall** be carried out through the Document Control and Data Records Standard (RE-03-001).

4.5.3 Internal Audit

Aim

This paragraph explains what steps are needed to determine whether the EMS is functioning as intended and is supporting a path towards continuous improvement in environmental performance.

Sites will be expected to complete one internal EMS audit per annum and, additionally, a combination of waste, pollution and external EMS audits as required by the HSE Advisor. If this is not practicable, dispensation **shall** be sought from the HSE Manager.

The audit scope and housekeeping checklist can be found in (RE-05-CHK-006) and (RE-05-CHK-007).

A template for audit reports can be found in (RE-05-FO-019).

A requirement of this paragraph is to comply with:

• ISO 14001 Requirement 4.5.5 Internal Audit

All EMS Auditors are required to undergo Institute of Environmental Management and Assessment (IEMA) accredited audit training (3-day course) before undertaking internal audits or seeks dispensation from the HSE Manager, if they have equivalent experience or training.

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A Lead Auditor <u>should</u> be someone who has done 10 to 12 audits over a reasonably short time i.e. 3 to 4 years. They <u>should</u> have completed an EMS auditor course (or similar). Prior to becoming a Lead Auditor they <u>should</u> be observed by an existing Lead Auditor to ensure they have the necessary skills.

Process

Planning

The EMS Single Point of Accountability (SPA) shall provide leadership and direction of the process to:

- Select a Lead Auditor and, if required, additional members of the audit team;
- Highlight any specific areas for the audit to focus on, as appropriate (see Internal Audit RE-03-004).

When determining the frequency and effort of audit activity, or suggesting amendments to existing internal audit schedule, the following **should** be taken into account:

- Changes in the organisation;
- Changes in activities, products and services;
- Changes in risk;
- Environmental performance;
- History of non-compliance/conformance.

Conducting the Audit

The Lead Auditor <u>should</u> convene an opening meeting with the appropriate member of the management team to explain the scope and purpose of the audit, and the roles and responsibilities. During the audit, the Audit Scope Checklist (RE-05-CHK-006) <u>should</u> be used as an auditing guide. It is not anticipated that all subject areas are audited. The Lead Auditor <u>should</u>, be make reference to the agreed scope of the audit for the asset/site.

After the audit is concluded, a meeting **shall** be held between the audit team and appropriate members of the management team to review findings, identify corrective and preventative action and, based on the roles and responsibilities the next steps to be taken.

Actions arising from the audit **shall** be entered into the Action Tracker (RE-05-LOG-001) as individual actions. The audit itself is to be recorded on the server as an EMS audit.

The Lead Auditor <u>shall</u> reach a verbal agreement on actions that are appropriate for the facility, regarding each finding from the audit. The site representative or a nominated individual <u>shall</u> enter and distribute actions arising from this discussion into the Action Tracker (RE-05-LOG-001). The approver of these actions **shall** be the Lead Auditor.

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Closure of these actions will be monitored and overdue actions highlighted by the HSE Advisor. Actions for closure **should** be attached to the Action Tracker (RE-05-LOG-001).

Records of internal audits, external audits, inspections and management reviews **shall** be retained electronically, where all relevant personnel have access.

Shared Learning

The EMS SPA **shall** review all internal audit findings on a regular basis and provide a summary to Senior Managements.

4.6 Management Review

Aim

This paragraph sets out how management reviews are conducted. The aim of management reviews is to provide visibility to senior leadership of the performance of the EMS. It also provides an opportunity to improve performance through amendment of the HSE policy and objectives and targets.

A requirement of this paragraph is to comply with:

• ISO 14001 Requirement 4.6 Management Review

Process

Two levels of management review **shall** be conducted annually, one at asset/site level and one at managerial level.

Asset/Site Management Review

The purpose of this management review is to consider asset environmental performance. As a minimum, the review will cover items (a) to (h) of 1SO 14001 Requirement 4.6.

The site/asset senior leadership and the HSE Advisor, in addition to asset team member(s), **shall** attend the review.

The outcomes of the asset management review are fed into the managerial management review, through the EMS SPA.

Managerial Management Review

This management review looks at overall Rathlin Energy environmental performance, taking into account the outcomes of asset management reviews.

As a minimum, the review will cover items (a) to (h) of ISO 14001 Requirement 4.6.

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These can be reviewed under the framework of the Management Review Standard (RE-03-006).

Review Outputs

A nominated person will take minutes of the reviews (these can be incorporated into the slides used). Actions will be entered into the Action Tracker (RE-05-LOG-001) and the action numbers sent to the EMS SPA. These are retained for a period of 3 years. The HSE Advisor will track the progress of actions highlighted at the management review meetings.

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