

Environmental Management System

Elsham Wold Site

Anhydrous Ammonia Recycling

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0 Terms and Definitions

Auditor Person with the competence to conduct an audit

Continuous improvement Recurring process of enhancing the environmental management system in order to achieve improvements in performance consistent with the organisation's environmental policy.

Corrective action Action to eliminate the cause of a detected nonconformity.

Document Information and its supporting media

Environment Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental aspect (EA) Elements of an organisation's activities or products or services that can interact with the environment.

Environmental impact Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.

Environmental management system (EMS) Part of an organisation's 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 an organisation sets itself to achieve.

Environmental performance Measurable results of an organisation's management of its environmental aspects.

Environmental policy Overall intentions and directions of an organisation related to its environmental performance as formally expressed by top management.

Environmental target Detailed performance requirement applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested party Person or group concerned with or affected by the environmental performance of an organisation.

Internal audit Systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the environmental management system is complied with.

Nonconformity Non-fulfilment of a requirement.

Organisation Blended Products Ltd

Preventive action Action to eliminate the cause of a potential nonconformity.

Prevention of pollution Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental impacts.

Procedure Specified way to carry out an activity or a process.

Record Document stating results achieved or providing evidence of activities performed.

Work Instruction Document detailing a specific procedure

1 Introduction

1.1 Purpose of this Manual

1.1.1 This Manual defines the Environmental Management System (EMS) of Blended Products Ltd and contains:

- a) The Environmental Policy;
- b) Statements of responsibility and authority;
- c) An overview of the company's environmental procedures and controls;
- d) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- e) The arrangement for periodic management reviews.

The purpose of this Manual is to provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

1.2 Scope of EMS

The EMS applies to the Anhydrous Ammonia Pressure Desorption Recycling Plant and Operation at Blended Products Ltd Elsham Wold site.

2 Environmental Policy

Blended Products Ltd is committed to protecting the environment of the Earth.

To minimise environmental impacts concerning our activities, products and services, we shall:-

- Strive to minimise pollution, reduce waste and minimise the consumption of resources.
- Educate, train and motivate employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among suppliers and subcontractors.

The Company is committed to continuous improvement of environmental performance.

This Policy will be communicated to all staff, contractors and suppliers, and be available for the public.

Endorsed by

Simon Barker

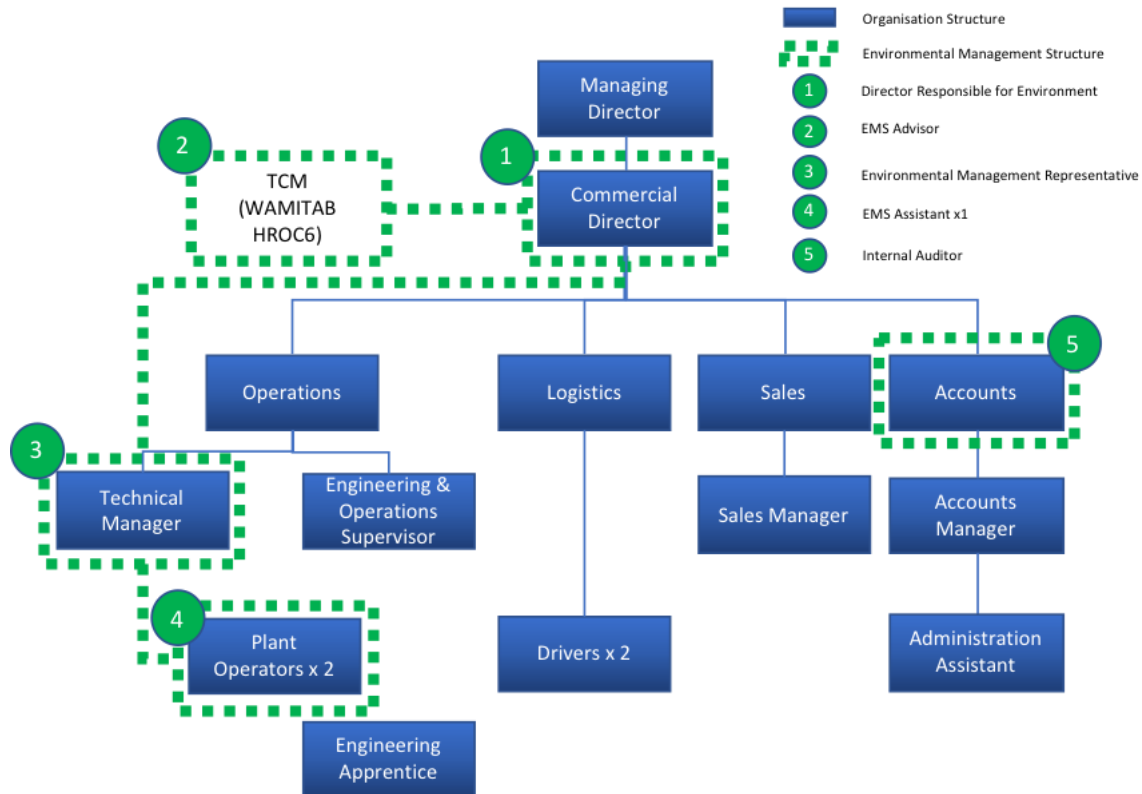
Commercial Director

Date :

-

3 Organisation

3.1 Organisation Chart



3.2 Roles and Responsibilities

3.2.1 Director Responsible for Environment (DRE)

The Commercial Director shall be appointed DRE at the Elsham Wold Site and is responsible for:

- endorsing the environmental policy;
- ensuring appropriate resources are provided to enable the effective operation and continuous improvement of the EMS.

3.2.2 Environmental Management Representative (EMR)

The Technical Operations Manager is the appointed EMR and is responsible for:

- ensuring that EMS requirements are established, implemented and maintained;
- ensuring that sufficient resources are allocated to the implementation of the EMS;
- regularly reviewing the effectiveness of the EMS;
- liaising with external agencies on matters requiring guidance and/or subject matter expertise (Consultants; Government Agencies etc);
- leading the EMS Committee to establish and implement the EMS;

- e) coordinating internal EMS audits and ensuring completion of arising action plans;
- f) handling and investigating nonconformity, ensuring corrective and preventive action has been taken to mitigate any impacts caused;
- g) reporting on the performance of the EMS to the Management Review Committee.

3.2.3 Deputy Environmental Management Representative (DEMR)

The Health and Safety Coordinator is the appointed DEMR and has responsibility for:

- a) assisting the EMR to ensure the EMS is effectively implemented and maintained;
- b) assuming the responsibility and action of the EMR when the EMR is unavailable.

3.2.4 Environmental Management System Committee (EMS Committee)

The EMS Committee is responsible for:

- a) the establishment and implementation of the EMS;
- b) the establishment and review of objectives;
- c) ensuring the effective implementation of environmentally-related controls;
- d) internal communication of environmental matters;
- e) promoting environmental awareness among company staff;
- f) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- g) any other EMS activities that are assigned by the EMR;
- h) holding regular EMS meetings (at approximately three-month intervals).

3.2.5 Management Review Committee

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the DRE, EMR, DEMR, and designated Function / Departmental Managers.

3.2.6 Training Manager

The EMR is the appointed Training Manager and responsible for:

- a) defining environmental training needs for all employees and contractors;
- b) preparing an annual environmental training plan;
- c) ensuring that all staff and contractors are trained in accordance with the environmental training plan;
- c) development, deployment and maintenance of appropriate training courses and associated resources (information; materials; external provisions etc)

- d) Reviewing the effectiveness and driving continuous improvement of the training plan and its associated courses and resources.
- e) keeping and maintaining training records.

3.2.7 Internal Auditor

The EMR is the appointed Internal Auditor and is responsible for:

- a) conducting 6-monthly audits of the EMS
- b) producing and presenting audit findings by formal report to the EMS Committee

3.2.7 Function / Departmental Manager

The Function / Departmental Managers are responsible for:

- a) establishing controls for the identified significant environmental aspects for their area of responsibility according to procedures and instructions
- b) ensuring that the EMS is properly implemented and that environmental matters are properly handled at all stages.

3.2.8 All Employees

All employees are responsible for:

- a) working in accordance with documented environmental procedures and instructions;
- b) reporting problems or deviations associated with environmental issues and the EMS to the EMS Committee.

4 Environmental Management System Requirements

The EMS is developed to manage significant environmental aspects so as to limit their impacts on the environment. Procedures for each component are given in the relevant Environmental Procedures (EPs) listed in Annex A.

4.1 Environmental Management System Documents

The purposes of these EMS documents are as follows:

Environmental Policy describes the intention and principles to be adopted in relation to environmental performance.

Environmental Management System Manual (EMS Manual) describes the EMS and outlines how the requirements are achieved.

Objective(s) are the overall environmental goals that Blended Products Ltd set to achieve.

Target(s) are the measurable performance requirements that Blended Products Ltd establishes to achieve the objectives.

Programmes(s) are the activities that Blended Products Ltd implements to achieve the objectives and targets.

Environmental Procedures (EPs) define the roles, responsibilities, and actions to be taken to ensure that activities are performed and the EMS implemented.

Work Instructions Instructions (WIs) Describe in step-by-step detail how activities should be performed to manage significant environmental aspects and to comply with the EMS.

Environmental Forms/Records Record information for the audit trail and the assessment of environmental conditions and performance.

Register of Environmental Aspects compiles the environmental aspects that are derived from the activities and services of Blended Products Ltd; detailing the respective operational controls for significant environmental aspects.

Register of Legal and Other Requirements Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to Blended Products Ltd.

4.2 Environmental Policy

Blended Products Ltd's Environmental Policy is included in Section 2 of this document and outlines the environmental commitments of Blended Products Ltd.

The policy shall stipulate the commitments of Blended Products Ltd to continuously improve its environmental management. Blended Products Ltd is also committed to comply with applicable legal requirements and other requirements to which Blended Products Ltd subscribes in relation to its environmental aspects. The environmental policy shall provide a framework for setting and reviewing objectives and targets.

4.3 Planning

Blended Products Ltd shall follow a "plan-do-check-act" process to facilitate continuous environmental performance improvements. The planning process includes the identification and updating the Register of Environmental Aspects, and Register of Legal and Other Requirements.

4.3.1 Environmental Aspects

The planning process commences with the evaluation of environmental aspects. In order to evaluate the impacts of its activities to the environment, Blended Products Ltd shall identify the environmental aspects of its activities, products or services that it can control and those that it can influence considering planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

Blended Products Ltd shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

4.3.2 Legal and Other Requirements

Blended Products Ltd shall identify and comply with legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects.

Blended Products Ltd shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

4.3.3 Objectives, Targets and Programmes

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within Blended Products Ltd. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, Blended Products Ltd shall consider legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, compliance with applicable legal requirements and other requirements, and to continuous improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

The DRE shall approve the objectives, targets and programmes proposed by the EMS Committee before implementation. The EMR shall ensure that the objectives and targets are measurable and that the progress towards achieving the objectives and targets is continuously monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the EMS Committee every 3 months. The EMR shall lead the EMS Committee in revising the objectives, targets and programmes as necessary.

Blended Products Ltd shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EMR shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

The EMR shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

4.4 Implementation and Operation

The implementation of the EMS requires Blended Products Ltd to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

4.4.1 Resources, Roles, Responsibility and Authority

Top management of Blended Products Ltd shall commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

Blended Products Ltd has appointed the Technical Operations Manager as the Environmental Management Representative (EMR), and the Health and Safety Coordinator as the Deputy Environmental Management Representative (DEMUR) for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

4.4.2 Competence, Training and Awareness

Blended Products Ltd shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

Blended Products Ltd shall ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

Blended Products Ltd shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- a) the roles and responsibilities in achieving conformity with the environmental management system
- b) the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS
- c) the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance
- d) the potential consequences of departure from specified operating procedures

4.4.3 Communication

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available and communicated to employees.

Employees are encouraged to report enquiries or concerns regarding to the EMS and/or environmental issues pertaining to the business activities of Blended Products Ltd to the EMR. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement an appropriate programme for this external communication. External communication is not to be undertaken without written authority if the EMS Committee.

4.4.4 Documentation

The Environmental Management System documentation encompasses four levels as described below :

- a) **Environmental Management System Manual** (this document) details the principal objectives and environmental commitments of Blended Products Ltd.
- b) **Environmental Procedures (EPs)** provide a detailed description of the EMS elements and define who should do what, how and when.
- c) **Work Instructions (WIs)** provide detailed instructions for specific Tasks.
- d) **Environmental Records** include various reports and meeting records.

4.4.5 Control of Documents

All documentation pertaining to implementation of and compliance with the EMS are listed at Annex A and shall be controlled through Blended Products Ltd's Document Control System (DMS) with the following provisions:

- a) they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- b) the current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- c) documents of external origin determined by the organization to be necessary for the planning and operation of the EMS shall be identified and their distribution controlled;
- d) obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use

4.4.6 Operational Control

Blended Products Ltd shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

Blended Products Ltd shall ensure that all operations and activities, carried out by its employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Work Instructions (WIs), are communicated to personnel whose tasks may result in significant environmental aspects.

4.4.7 Emergency Preparedness and Response

Blended Products Ltd shall, within its Major Emergency Plan (MEP), identify potential emergency situations and responses in order to prevent and/or mitigate environmental impacts that may associate with them.

Blended Products Ltd shall also periodically test the Major Emergency Plan where practicable.

4.5 Checking

While implementing the EMS, Blended Products Ltd shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

4.5.1 Monitoring and Measurement

Blended Products Ltd shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

4.5.2 Evaluation of Compliance

To meet the company's commitment to compliance, Blended Products Ltd shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements and other requirements that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

4.5.3 Nonconformity, Corrective and Preventive Action

Continuous improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Blended Products Ltd shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- a) handle and investigate nonconformity
- b) take action to mitigate the impacts caused
- c) initiate and complete corrective and preventive actions
- d) ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered
- e) record the results of corrective and preventive actions taken
- f) review the effectiveness of corrective action and preventive action taken

4.5.4 Control of Records

Records shall be maintained of Blended Products Ltd's environmental performance, to demonstrate conformity to the requirements of the EMS..

Blended Products Ltd shall establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

4.5.5 Internal Audit

Blended Products Ltd shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- a) determine whether or not the environmental management system:
 - i) conforms to planned arrangements for environmental management
 - ii) has been properly implemented and maintained
- b) provide audit results and information for management review for environmental improvement.

4.6 Management Review

The DRE shall conduct a management review of the environmental management system at least annually to ensure its suitability, adequacy and effectiveness.

The EMR shall schedule the management review and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The DRE, EMR and DEMR together with the EMS Committee shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, business activities, technology, and learnings from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- a) review of the environmental policy, objectives, targets, and programmes;
- b) review of legal compliance and compliance with other requirements (including contractor compliance on Blended Products Ltd's activities);
- c) environmental aspects of activities and their disclosure to public;
- d) findings of the internal audits;
- e) review of nonconformities and the status of corrective/preventive actions;
- f) communications from external interested parties, including complaints;

- g) areas for improvement with respect to environmental performance;
- h) adequacy of emergency preparedness and response;
- i) changing circumstances, including developments in legal and other requirements related to its environmental aspects,
- j) identify the need for modification of the existing EMS in light of the above items, and
- k) follow-up action from previous management reviews.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record.

Controlled Document List

Document No.	Document/Form Name
BPL-CP-01	Environmental Policy
BPL-O&T-YYYY	Objectives, Targets and Programmes
BPL-EAR-01	Register of Environmental Aspects
BPL-LR-01	Register of Legal and Other Requirements
BPL-EMS	Environmental Management System Manual
BPL-EP-01	Identification of Environmental Aspects and Significance Evaluation
BPL-EP-02	Review of Legal and Other Requirements
BPL-EP-03	Training
BPL-EP-04	Control of Documents
BPL-EP-05	Environmental Emergency Preparedness and Response
BPL-EP-06	Environmental Monitoring and Evaluation of Compliance
BPL-EP-07	Enquiry / Complaint / Nonconformity Handling
BPL-EP-08	Control of Records
BPL-EP-09	Internal Audit