Safran Landing Systems Services UK LTD

Environmental Risk Assessment

Application for a Variation to Environmental Permit EPR/BL0138IP

July 2026

Document Control Sheet

Identification	
Client	Safran Landing Systems Services UK Limited
Document Title	Environmental Risk Assessment
Bureau Veritas Ref No.	30637505

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Configuration				
Version	**Date**	**Author**	**Reason for Issue/Summary of Changes**	**Status**
1.0	02/07/2026	E Haymer	Issued for client comment	Draft
1.1	02/07/2026	E Haymer	Incorporating client comments	Final

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1 Introduction

This report has been produced to support Safran Landing Systems Services UK LTD (SLSS) with a variation application under the Environmental Permitting (England and Wales) Regulation (EPR) 2016[1]. The Site currently operates under Environmental Permit (EP) (reference: EPR/BL0138IP) at Meteor Business Park in Gloucester. The variation notice number is EPR/BL0138IP/V005.

The facility provides metal plating services for aircraft landing gear components as part of the aerospace refurbishment industry. Safran is installing a new zinc nickel electroplating line at the site, which requires a substantial variation to the existing environmental permit. The new line is fully installed and awaiting commissioning.

This Environmental Risk Assessment (ERA) has been undertaken in accordance with the Environment Agency (EA) guidance Risk Assessments for your Environmental Permit[2]. The aim of the ERA is to identify any potential significant risks to the environment and human health and demonstrate that the risk of pollution or harm will be acceptable by taking the appropriate measures to manage these risks.

1.1 Purpose of Assessment

The aim of this ERA is to identify potential significant risks to the environment and human health, demonstrate that the risk of pollution or harm will be acceptable through appropriate management measures, and comply with the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

1.2 Scope of Variation

The variation introduces:

- One new emission point to air (A3) serving the zinc-nickel plating line
- Extension of the permitted site boundary to accommodate new infrastructure at Hangar 5
- New zinc-nickel electroplating and passivation facility replacing manual cadmium plating operations
- Enhanced closed-loop water treatment system with vacuum evaporation

Note: This assessment focuses exclusively on the new zinc-nickel line. Existing permitted operations (chromium plating line A1 and nickel/cadmium plating line A2) are not being modified and are not reassessed.

[1] https://www.legislation.gov.uk/uksi/2016/1154/schedule/1
[2] https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

2 Risk Assessment Approach

This ERA follows the six-step approach specified in EA guidance:

Step 1: Identify and consider risks for the site and sources of risks

Step 2: Identify receptors at risk from the site

Step 3: Identify possible pathways from sources to receptors

Step 4: Assess risks and check they are acceptable

Step 5: State what will be done to control risks if too high

Step 6: Submit risk assessment

2.1 Screening of Risks

The following potential impacts have been identified for detailed assessment:

- Point source emissions to air (nickel and zinc compounds)
- Accidents (chemical spills, fire, flooding)
- Noise and vibration (extraction systems, process equipment)
- Fugitive emissions (chemical handling, storage, transfer operations)
- Global warming potential (energy consumption)

The following have been screened out as not applicable:

- Process effluent discharge (closed-loop system with zero discharge)
- Bioaerosol release (not generated by electroplating processes)
- Odour (chemicals used do not generate significant odour)

3 Identifying the Risks

3.1 Site Description

Location: Meteor Business Park, Cheltenham Road, Gloucester, GL2 9QL

National Grid Reference: SO 88319 22011

Site Setting: Industrial/commercial estate approximately 4 km northeast of Gloucester

3.2 Surrounding Land Use

Table 3.1 – Surrounding Land Use

Boundary	Description
North	Industrial/commercial premises, with open land beyond
East	Industrial/commercial premises with residential properties beyond (700 m)
South	Industrial/commercial premises, Gloucestershire Airport
West	Industrial/commercial premises, golf complex and isolated residential properties

3.3 Geology, Hydrogeology and Hydrology

Bedrock[3]**:** Rugby Member-Mudstone and limestone, interbedded

Superficial Deposits[4]**:** None present

Source Protection Zone[5]**:** None present

Flood Risk[6]**:** Flood Zone 1 (low probability <0.1% annual)

Surface Water: Hatherly Brook, approximately 50 m to the north of site at the closest point. Normans Brook (700 m southwest)

3.4 Ecological and Cultural Heritage

Within 10 km:

- Cotswold Beechwoods SAC (7.2 km S)

Within 2 km:

- Prior's Grove LWS (1.5 km N)
- Several Grade II listed buildings within 2 km, the closest being Lower Court Farmhouse, approximately 1.5 km northeast of site

Searches on MAGIC map confirmed that none of the following are present within a 2 km radius of the site:

- Scheduled monuments
- Registered parks and gardens
- Registered battlefields

[3] https://geologyviewer.bgs.ac.uk/?_ga=2.199972843.411345504.1782977759-1957278197.1782977759
[4] https://geologyviewer.bgs.ac.uk/?_ga=2.199972843.411345504.1782977759-1957278197.1782977759
[5] https://magic.defra.gov.uk/MagicMap.html
[6] https://flood-map-for-planning.service.gov.uk/map?cz=388335,222119,15

- World Heritage sites

3.5 Identified Receptors

Human Receptors:

- Residential properties (nearest 400 m southwest, 700 m east)
- Site workers and contractors
- Local road users (Cheltenham Road East
- Gloucestershire Airport

Ecological Receptors:

- Prior's Grove LWS (1.5km N)
- Cotswold Beechwoods SAC (7.2km S)
- Priority species: Lapwing, Curlew

Environmental Receptors:

- Local air quality
- Soil and land quality

4 Environmental Risk Assessment

4.1 Air Emissions Risk Assessment

Table 4.1 – Air Emissions Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Emissions from zinc-nickel plating line stack (A3): nickel and zinc compounds	Human receptors (closest residential properties 400 m SW, 700 m E); Ecological receptors (Prior's Grove LWS 1.5km N, Cotswold Beechwoods SAC 7.2km S)	Air dispersion	**Design Controls:** Local exhaust ventilation with lids on extracted tanks; lip extraction ducts on both sides; fume blow-down fans; maximum 2 lids open at any time; manual/automatic damper control; centrifugal fan with inverter drive and sound attenuation. **Emission Limits:** Nickel 10 mg/m³, Zinc 5 mg/m³ (consistent with BAT). **Monitoring:** Bi-annual stack testing by accredited laboratory. **Dispersion Modelling:** Demonstrates compliance with air quality objectives - maximum nickel PC 59.3% of AQS, zinc PC <0.1% of EAL at human receptors; nickel deposition 27.1% of limit, zinc deposition 6.8% of limit. **Maintenance:** Planned preventative maintenance per manufacturer requirements; weekly external inspection of ducts; quarterly internal cleaning; LEV testing.	Low	Pollution, harm to environment and human health	**Low**
Visible emissions from stack during	Human and ecological receptors within 2 km	Air dispersion	**Operational Controls:** Automated process control minimises start-up emissions; PLC-controlled	Low	Nuisance, potential pollution	**Low**

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
start-up or process upset			transporter system; temperature and pH monitoring with alarms; visual inspection during operation. **Maintenance:** Regular maintenance per schedule prevents equipment malfunction; operator training on abnormal conditions.			

4.2 Fugitive Emissions Risk Assessment

Table 4.2 – Fugitive Emissions Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
TO AIR: Emissions during transfer of chemicals (filling/emptying tanks, deliveries)	Human receptors (site workers, nearby residents); Local air quality	Air dispersion	**Operational Procedures:** Deliveries from approved suppliers only; fully supervised chemical transfers; portable spill barriers positioned during transfers; spill kits available at strategic locations; tank emptying is an automated process to the 30,000-litre bunded effluent tank; dry brake connections are incorporated to reduce risk during effluent disposal. **Design Controls:** IBC containers in dedicated bunded areas; lockable chemical storage cages; closed transfer systems where practicable; chemical additions are controlled through a fully extracted dissolution tank. **Training:** All operators trained in chemical handling procedures; emergency response training; annual refresher training. **Monitoring:** Daily visual inspections of storage areas; monthly stock level verification by Environmental Chemist.	Low	Pollution, harm to environment and human health	**Low**
Tank breathing during normal operation	Human receptors; Local air quality	Air dispersion	**Design Controls:** All process tanks fitted with lids; extraction system captures vapours; tanks only open during loading/unloading (max 2 at a time); automatic damper control balances airflow.	Low	Pollution, harm to environment and human health	**Low**

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
			Process Control: PLC-controlled operations minimise tank opening time; temperature control prevents excessive evaporation; pH monitoring prevents off-gassing.			
TO WATER: Runoff from process areas (generator and tank locations)	Groundwater, soil and land	Overland flow, percolation through ground	**Primary Containment:** All process tanks containerised; tanks designed with 110% secondary containment. **Secondary Containment:** Concrete bunding (minimum 250 mm height) around all chemical storage and process areas; bunds sized for 110% of largest container or 25% of total volume; impermeable construction; spillage detection and sumps. **Leak Detection:** Spillage detection systems and sumps for early leak identification and containment. **Inspection:** Bi-weekly inspection of tanks and weekly inspection of containment by site personnel; integrity checks of hardstanding; immediate repair of defects; tanks will be spark tested as part of the maintenance program.	Low	Pollution, harm to environment and human health	**Low**

4.3 Accident Risk Assessment

Table 4.3 – Accident Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Leak from chemical storage tanks or process tanks	Soil; Surface water	Overland flow, percolation	**Bunding:** Concrete bunds (250 mm minimum height) around all storage; bunds sized for 110% largest container or 25% total volume; impermeable construction; separate bunds for incompatible chemicals; bunding is provided via an ACO channel which discharges into the main sump; spillage detection and sumps. **Monitoring:** Routine monitoring and compliance evaluation. **Emergency Response:** Spill kits at strategic locations; trained response teams; basement spillage procedure (EMS 4.4.7.4); 24-hour security monitoring; emergency communication systems.	Low	Pollution, harm to environment and human health	**Low**
Discharge of chemicals outside bunded area (spillage during delivery or transfer)	Groundwater; Soil; Surface water; Human receptors	Overland flow, percolation, direct contact	**Operational Controls:** Deliveries from approved suppliers only; delivery procedures in EMS. **Site Design:** All site drainage passes through interceptors before discharge; no direct pathway to watercourses. **Emergency Response:** Spill kits immediately available; absorbent materials; trained personnel;	Low	Pollution, harm to environment and human health	**Low**

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
			spill procedure in EMS; immediate clean-up protocol; licensed waste contractor for disposal. **Storage Security:** Lockable chemical storage areas; access control; inventory management; COMAH compliance monitoring.			
Fire in process area or chemical storage	Human receptors (site workers, nearby residents); Ecological receptors; Air quality; Groundwater (firewater runoff)	Air (smoke), overland flow, water	**Fire Prevention:** Fire detection and suppression systems; regular fire risk assessments; temperature gauges to ensure no overheating. **Emergency Response:** Emergency procedures in EMS; evacuation procedures with regular drills; firefighting equipment such as extinguishers located across site.. **Separation:** Incompatible chemicals stored separately; flammable materials separated from oxidising agents; spontaneously combustible materials in dry conditions.	Low	Pollution, harm to environment and human health	**Low**
Security breach and vandalism	Human receptors; Environment (potential chemical release)	Air, land	**Physical Security:** 24/7 security presence; perimeter security fencing; site access control system; visitor sign-in/sign-out procedures. **Chemical Security:** Lockable chemical storage cages; inventory control; COMAH compliance monitoring; restricted access to process areas.	Low	Pollution, harm to environment and human health	**Low**

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Flooding (surface water or fluvial)	Human receptors; Environment (potential chemical mobilisation)	Land, water	**Flood Risk:** Site in Flood Zone 1 (low probability <0.1% annual); Hatherly Brook is located approximately 50 m away from site (N/NE). Emergency response procedures prioritise preventing entry to Hatherly Brook and Normans Brook (700 m SW) in the event of a spill. **Site Design:** All site drainage leaves site via interceptors allowing more time to take remedial action; drainage channel surrounding the industrial site on which the subject site is located. **Monitoring:** Environment Agency flood warnings monitored; annual reviews are carried out to assess any change to flood risk.	Low	Pollution, harm to environment and human health	**Low**

4.4 Noise and Vibration Risk Assessment

Table 4.4 – Noise Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Noise from extraction system (centrifugal fan, dampers)	Residential receptors; Site workers	Air propagation	**Design Controls:** Centrifugal fan with high-efficiency motor and inverter drive (variable speed control); sound attenuating box on air blower; inverter drive allows speed reduction during sensitive periods. **Operational Controls:** 24/7 operation maintains consistent noise levels (no start-up/shutdown peaks); automatic damper control minimises unnecessary extraction; smart parking function optimises transporter movements. **Noise Assessment:** BS4142:2014+A1:2019 assessment demonstrates Low impact at all NSRs; rating levels well below background sound levels; predicted specific sound levels: NSR1 16dB, NSR2 19dB, NSR3 9dB, NSR4 18dB (night-time worst case); new plant does not increase existing site noise at NSRs; impacts below Lowest Observed Adverse Effect Level (LOAEL). Gloucestershire Airport (immediately south): Industrial receptor, no significant impact anticipated given existing airport noise environment. **Maintenance:** Regular maintenance per schedule prevents equipment degradation; lubrication of moving parts; replacement of worn components; annual noise monitoring.	Low	Nuisance	**Low**

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Noise from process equipment (pumps, agitation systems, transporter)	Residential receptors; Site workers	Air propagation	**Design Controls:** Equipment selected for low noise operation; pumps and motors in enclosed areas; vibration isolation mounts; acoustic lagging where appropriate. **Operational Controls:** Equipment operates within design parameters; no unnecessary operation; maintenance prevents noisy operation. **Worker Protection:** Hearing protection provided where required; noise exposure monitoring.	Low	Nuisance, potential hearing damage (workers)	**Low**
Noise from deliveries (chemical tankers, waste collection)	Residential receptors	Air propagation	**Operational Controls:** Deliveries during daytime hours only (except emergencies); considerate vehicle operation; segregated delivery areas away from site boundary. **Site Layout:** Delivery areas located away from nearest residential receptors; intervening industrial buildings provide screening; distance to nearest residents (370 m) provides significant attenuation.	Low	Nuisance	**Low**
Vibration from process equipment	Residential receptors; Site workers; Building structures	Ground transmission	**Design Controls:** Vibration isolation mounts on all rotating equipment; equipment foundations designed to minimise transmission; no percussive or impact processes. **Assessment:** Operational vibration impacts scoped out due to low vibration levels and separation distances (370 m+); no perceptible vibration impacts predicted at sensitive receptors.	Very Low	Nuisance, structural damage	**Very Low**

4.5 Global Warming Potential Risk Assessment

Table 4.5 – Global Warming Risk Assessment

Hazard	Receptor	Pathway	Risk Management	Probability	Consequence	Overall Risk
Generation of CO_2e emissions from energy consumption (electricity for process equipment, heating, cooling, extraction)	National and global climate; Air quality	Atmospheric emissions	**Energy Management:** Energy consumption integral to EMS; monthly monitoring of electricity and gas consumption; annual reporting to Environment Agency; sustainability programme aligned with Safran Group 50% reduction target by 2030. **Energy Efficiency Measures:** Design measures to minimise drying energy; exhaust Fan (Centrifugal direct driven) with high efficiency motor and inverter drive. **Process Optimisation:** Vacuum evaporator reduces energy consumption and increases the evaporation rate; automated process control prevents unnecessary operation; smart parking function optimises transporter movements; temperature control prevents over-heating/cooling. **Benchmarking:** Energy usage per unit of production monitored; electricity and gas consumption trends tracked; energy intensity ratios reviewed monthly at policy deployment meetings; annual management review; participation in Safran Group benchmarking. **Estimated Additional Consumption:** Electricity 2,346 MWh/y (no additional gas) (current 3,552 MWh/y).	Medium	Harm to environment, contribution to climate change	**Medium**

Note: While energy consumption and associated CO_2e emissions are unavoidable for the proposed operations, the site has implemented comprehensive energy efficiency measures and participates in corporate sustainability programmes targeting 50% reduction by 2030. The risk is managed to as low as reasonably practicable through application of BAT.

5 Environmental Management System and Emergency Response

SLSS operates an integrated management system that fully incorporates Safety, Health, Environment and Quality (SHEQ) Management Systems, certified to ISO 14001:2016. The Environmental Management System (EMS) has been established to enable the organisation to proactively improve environmental performance and reduce the environmental impact of activities carried out by staff, visitors and contractors on site.

5.1 Environmental Management Framework

The organisation has determined internal and external issues relevant to its purpose and ability to achieve EMS intended outcomes. This includes consideration of:

- Political, Economic, Social, Technological, Environmental and Legislative factors (PESTEL analysis)
- SWOT analysis (Strengths, Weaknesses, Opportunities, Threats)
- Needs and expectations of interested parties including regulatory authorities, suppliers, contractors, workers, customers and community services

The EMS encompasses all operations at the Gloucester facility, including:

- Metal finishing and electroplating (cadmium, chromium, nickel, zinc-nickel)
- Materials processing and heat treatment
- Chemical storage and handling
- Effluent treatment operations
- Waste management systems

The system operates on a Plan-Do-Check-Act (PDCA) cycle, ensuring continual improvement whilst maintaining compliance with environmental legislation and COMAH requirements.

Top management demonstrates active leadership through regular "I for Environment" campaigns, monthly policy deployment reviews, direct oversight of environmental objectives and resource allocation for environmental programmes. The Environmental Policy commits to preventing pollution, minimising environmental impact, complying with legal requirements and operating responsibly with consideration for community impacts.

5.2 Environmental Management Framework

The Managing Director ensures all hazards associated with site activities are assessed for risk, considering routine and non-routine activities, external hazards, contractor activities, changes to systems and processes, emergency situations and human behaviour.

Legal requirements are determined with reference to the HSE website and Legislation Update Service, with new requirements recorded within management review meetings and communicated to all personnel.

All changes to the business are managed in line with Safran Standards and WP161 Change Management Procedure, ensuring risks are identified before implementation with appropriate mitigation measures.

5.3 Emergency Preparedness and Response

The company has identified potential emergency situations including tank leakage/rupture, chemical spillage during additions, overflow due to operator error, fire in adjacent areas, inadvertent mixing of incompatible plating solutions and toxic gas release (hydrogen cyanide).

Detection and Response Systems:

- HCN gas detection systems installed in MFF basement linked to alarm system
- 24-hour security monitoring with emergency coordination
- Trained spill response teams with chemical spill kits at strategic locations
- Basement spillage procedure (EMS 4.4.7.4) for plating solution releases
- Evacuation procedures (WP0079) with annual drills

Emergency Equipment:

- Spillage containment kits positioned around site
- Clay matting/drain covers for external incidents
- Fire detection and suppression systems
- Emergency communication systems linked to security lodge

Major Accident Prevention:

The site maintains a Major Accident Prevention Policy (MAPP) addressing inventory control to prevent exceeding Lower Tier thresholds, segregation protocols preventing mixing of incompatible chemicals, permit-to-work systems for basement access during production and contractor management requiring risk assessments.

Off-Site Communication:

- Annual public notification leaflet to adjacent Staverton area sites
- Risk cards held at security for emergency services
- Coordination with Gloucestershire Airport emergency plans
- Environment Agency notification protocols

Aquatic Environment Protection:

- All site drainage passes through interceptors before discharge
- Emergency response prioritises preventing entry to Normans Brook (700 m SW) and Hatherley Brook (50 m N)
- Spill response targets <1 kg chemical loss to drainage systems
- Basement bunding prevents escape of process solutions

Atmospheric Releases:

- Local Exhaust Ventilation (LEV) systems minimise airborne chemical releases
- Prevailing south-easterly winds considered in emergency planning
- Dispersion modelling completed for worst-case scenarios
- Air quality monitoring protocols established

5.4 Monitoring and Performance Evaluation

Routine Monitoring

- Monthly stock level verification by Environmental Chemist
- Bi-weekly tank content analysis by Laboratory Team
- Weekly bund integrity inspections (basement areas)
- Monthly spillage kit checks by Process Operatives
- Bi-annual LEV testing with records maintained
- Chrome mist testing every two weeks

Compliance Evaluation

- Legislation updates via Legislation Update Service (monthly)
- Annual compliance review in Management Review meetings
- Environment Agency inspections under IPPC Permit BL0138IP
- Internal audits annually per ISO 14001 requirements
- BSI certification audits for EMS maintenance

Management Review

Management review meetings undertaken at least annually in accordance with ISO 14001 and 45001 requirements, attended by the Managing Director and relevant interested parties, reviewing all pertinent aspects with actions taken as required.

5.5 Incident Management and Continuous Improvement

All personnel required to record incidents (accidents, near misses, deviations, environmental spills) via Non-conformance Report or Fabriq portal. The HSE Supervisor defines corrective actions, records actions and monitors progress until closure. Structured Accident Investigation procedures involve staff from relevant business areas and subject matter experts.

SLSS operates a continual improvement procedure with a Continual Improvement Manager controlling the system. All projects and programmes controlled through change management process and reviewed against continual improvement in line with company aims. Staff encouraged to raise improvement ideas annually through Improve application on Smartsheet portal.

5.6 Training and Competence

SLSS ensures only personnel with suitable qualification and experience are employed on work tasks with potential to cause harm. The company takes action to ensure training requirements are met, monitors training effectiveness, conducts personnel appraisals regarding competence and maintains records of training, education, qualification and experience.

Staff awareness maintained through company intranet access, notice boards, regular company briefings (all staff attending) and monthly Company Brief by Managing Director covering HSE aspects.

6 Conclusions

The proposed zinc-nickel electroplating line has been designed and will be operated in accordance with Best Available Techniques, incorporating comprehensive environmental protection measures. All identified risks have been assessed and appropriate management measures identified to reduce risks to acceptable levels.

The assessment demonstrates that:

- Emissions to air will comply with relevant air quality standards and environmental assessment levels
- Fugitive emissions will be prevented through robust containment and operational controls
- Accident risks will be managed through prevention, detection and response measures
- Noise impacts will be below significance thresholds
- Energy and resource efficiency is optimised through BAT application

The environmental risks associated with the proposed variation are acceptable and will be managed in accordance with the site's ISO 14001:2016 certified Environmental Management System.