ENVIRONMENTAL POLICY MANUAL

RE-02-002

Rev 7

July 2020

Business Management Structure

For All Documents Created for Rathlin Energy (UK) Limited

APPROVAL LIST

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Revision History

Revision	Reason for Revision	Date of Revision
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CIRCULATION LIST

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

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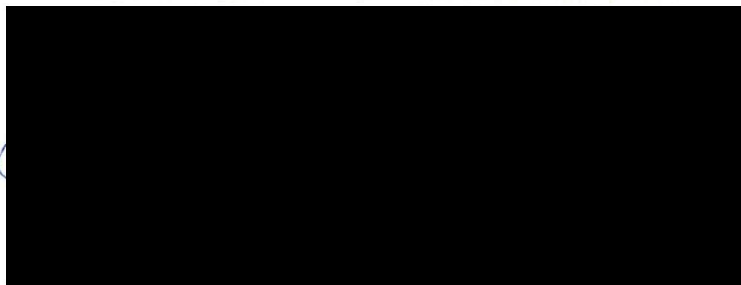
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FOREWARD

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 Health and Safety Policy is contained in (RE-01-001) and the Environmental Protection Policy is contained in (RE-01-002).

Director with Accountability for Health, Safety and Environment

Rathlin Energy (UK) Limited

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Contents

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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 Director with Accountability for Health, Safety and Environment.
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 an environmental 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 and permits, 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 Operating Techniques i.e. the Waste Management Plan, 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 offices and operated sites and facilities 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.

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.

Environmental Policy

Overall intentions and direction of Rathlin Energy related to its environmental performance, as formally expressed by the Director with Accountability for Health, Safety and Environment.

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.

4   Environmental Management System Requirements

4.1   General Requirements

Rathlin Energy **shall** establish, document, implement, maintain and continually improve an EMS in accordance with the requirements of ISO 14001 and **shall** 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 Health and Safety Policy (RE-01-001); and
- 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 Director with Accountability for Health, Safety and Environment, on behalf of the Rathlin Energy Board, incorporating best industry practices and is 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; or
- A change in the scope of Rathlin Energy activities or key environmental issues.

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 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 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).

All sources of actual and potential environmental impact **shall** be comprehensively identified, including potential non-routine and emergency situations. The review **shall** 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 outlined 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).

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 health.	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.	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 utilising it	Actions/operations result in slight impairment of corporate environmental image or policy
Positive	An enhancement in some ecosystem or population parameters.	An enhancement in the availability or the quality of a resource(s) benefiting persons utilising it.	Enhancement of corporate environmental image 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 Rating	Consequence Rating			
	Major	Moderate	Minor	Negligible
5				
4				
3				
2				
1				

Final Significance Rating		
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 aspect 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.

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 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; and

- 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;

- Valid from date; and

- Expiration date.

In addition to the register, each asset/site **shall** 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's 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

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; and
- 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

A matrix identifying roles and responsibilities relating to the EMS is included within Appendix 1.

Process

Organisational Structure

The overall responsibility for the Rathlin Energy EMS is held within the Rathlin Energy Management Team. This team comprises the Director with Accountability for Health, Safety and Environment, 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; and
- Delivery and evaluation of training.

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; and
- 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;
- H_2S Training;
- Environmental spills and clean up Training;
- Confined Space Entry Training;
- Environmental legislation Training;
- EMS auditing Training; and
- 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; and
- Excellence programme will provide a roadmap of expected qualifications and competencies for environmental professionals.

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; and
- 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; and
- Emergency organisations.

Statutory and Regulatory Bodies

Communication with regulators generally occurs at two levels:

(1) Strategic and policy issues; and

(2) Operational issues.

Strategic and policy issues are communicated externally by the Country Manager and / or the HSE Manager in liaison with the Director with Accountability for Health, Safety and Environment.

Requests received at the site from external parties regarding operational issues are to be communicated to the Country Manager with the support of the HSE Advisor as required.

Information on environmental performance is communicated to regulators by the Compliance and Environment Team as required within the applicable site Permits and Consents.

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 are 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 **must** 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.

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.

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, 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); and
- 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;
- 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; and
- 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 shall determine:
  - o Whether the incident is of a 'major' or 'minor' nature. Note: all incidents requiring action beyond site boundaries shall be classified as 'major';
  - o The cause of the incident; and
  - o 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; and

- 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.

Pollution Hazard Schedule

POLLUTION HAZARDS	POLLUTION CONTROL MEASURES
Fuel leaks from plant and work equipment	Drip trays to be placed beneath static plant. Plant/work equipment regularly inspected for defect and records of such inspections to be recorded in the appropriate register.
Fuel spillage during refueling operations	Designated refueling area to be established onsite. 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 wagons or washout process	Bespoke washout area to be established on site with suitable containment system in place
Pollution from accidental release of hazardous substances	All hazardous substances to be properly stored in appropriate containers in such a manner as to prevent damage or accidental spillage.
Dust and Noise from operational activities	See below

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 Environmental Plan which will include the following:

- Waste Transfer Log;

- Table of Waste Streams Generated;
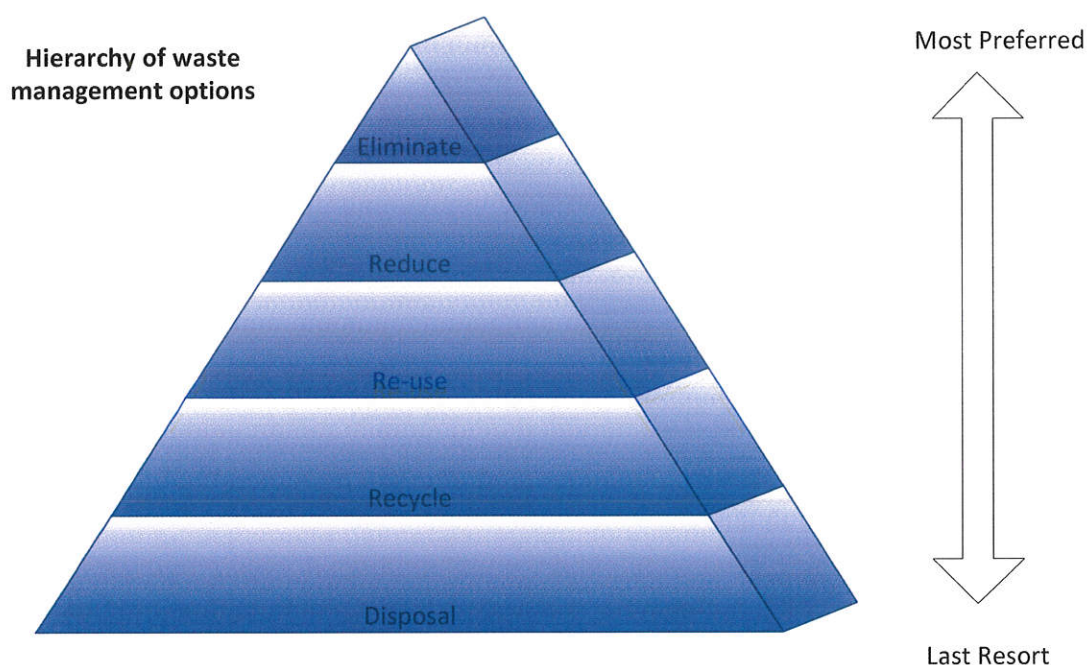
- Table of final Waste Receptors.

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:

Hierarchy of waste management options

Eliminate

Reduce

Re-use

Recycle

Disposal

Most Preferred

Last Resort

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; and
- Avoiding damage by handling and storing correctly.

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

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 **shall** be available to all personnel involved with or affected by the work. Appropriate Personal Protection Equipment (PPE) **shall** 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 **shall** 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 **shall** choose methods of work and equipment which **shall** reduce the potential exposure to Site personnel. PPE **shall** 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

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

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 environmental aspects; or

- 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; and
- External audits and inspections, including regulatory checks.

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 Actionee's 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.

A Lead Auditor **should** be someone who has done 10 to 12 audits over a reasonably short time i.e. 3 to 4 years. They **should** have completed an EMS auditor course (or similar). Prior to becoming a Lead Auditor, they **should** 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; and
- 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; and
- History of non-compliance/conformance.

Conducting the Audit

The Lead Auditor **should** 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) **should** be used as an auditing guide. It is not anticipated that all subject areas are audited. The Lead Auditor **should**, 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 **shall** 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 **shall** 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.

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

A management review meeting **shall** be conducted annually.

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 ISO 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.

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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Appendix 1 – Roles and Responsibilities

Role	Key Responsibilities	Clause(s)
Director with Accountability for Health, Safety and Environment	- Endorsement of the policy; - Development and review of the policy; - Scheduling policy annual reviews /other reviews; and - Implementing changes to policy.	4.2 Policy
	Ensure sufficient resources are available to implement, maintain and improve the EMS.	4.4.1 Resources, Roles, Responsibilities and Authority
	Ownership of environmental documents.	4.4 Documentation 4.4.5 Control of Document 4.5.4 Control of Records
	Attend and provide input at the annual management review.	4.6 Management Review
	Ensure assets/sites are in compliance with relevant legislation through the provision of adequate competent resources.	4.3.2 Legal and Other Requirements
	Ensuring that Rathlin Energy environmental requirements are included in asset specific objectives and targets within the asset plan.	4.3.3 Objectives, Targets and Programmes
Country Manager	Ensure polices and environmental requirements are communicated to all employees and contractors.	4.4.3 Communication
	Ensure implementation of operational control.	4.4.6 Operational Control
	Encourage all personnel to identify and communicate non-conformances.	4.5.3 Non-conformity and Corrective and Preventative Action
	Hold a management review of the EMS annually.	4.6 Management Review

Role	Key Responsibilities	Clause(s)
	▪ Review aspects register with cross-section of asset team and ▪ Ensure aspects register is filed appropriately and is readily available.	4.3.1 Aspects
	▪ Maintain consents and permits register; and ▪ Provide the Operations Manager with support required for the environmental elements of consent/permit preparation and submission.	4.3.2 Legal and Other Requirements
	▪ Support the Country Manager in delivering the environmental requirements of the plan.	4.3.3 Objectives, Targets and Programmes
	▪ Implement and maintain asset/site level processes and documentation.	4.4.1 Resources, Roles, Responsibilities and Authority
	▪ Responsible for promoting training and seeking assurance that it is being undertaken for the asset/site.	4.4.2 Competence Training and Awareness
	▪ Communicate relevant legal and other requirements to the site; ▪ Communicate key EMS structure and responsibilities to the site; and ▪ Communicate site environmental performance, findings from audits/inspections, non-conformances in relation to Rathlin Energy performance and management review outcomes.	4.4.3 Communication
	Ensure that all EMS asset/site specific documentation: ▪ Is held within the asset/site document control system; and ▪ Has an identified owner and a defined periodicity date.	4.4 Documentation 4.4.5 Control of Document 4.5.4 Control of Records
	▪ Drive implementation of, and conformance with, operating control procedures related to key environmental systems.	4.4.6 Operational Control
Divisional Managers	▪ Ensure that the emergency plans are kept up to date for operations, drilling and new projects.	4.4.7 Emergency Preparedness and Response
	▪ 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; and ▪ Seek assurance that consent and permit conditions are complied with at all times.	4.5.1 Monitoring and Measurement 4.5.2 Evaluation of Compliance
	▪ Ensure all environmental non-conformances are recorded in the action tracker (RE-05-LOG-001).	4.5.3 Non-conformity and Corrective and Preventative Action
	▪ Ensure that Logistics have been arranged for the audits; and ▪ Ensure that Actions are entered into the action tracker (RE-05-LOG-001) and closed out.	4.5.5 Internal Audit
	▪ 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); and ▪ Review and update asset level objectives and targets.	4.6 Management Review

Role	Key Responsibilities	Clause(s)
	▪ Ensure annual review of aspects register.	4.3.1 Aspects
	▪ Responsible for ensuring the site-specific environmental plan adequately covers environmental activities.	4.3.3 Objectives, Targets and Programmes
	▪ EMS focal point and responsible for establishing, implementing and maintaining the EMS across the sites/assets.	4.4.1 Resources, Roles, Responsibilities and Authority
	▪ Communicate the Rathlin Energy environmental requirements and plan; ▪ Communicate the Rathlin Energy (performance, significant findings from audits or inspections and environmental non-conformances; ▪ Communicate the Rathlin Energy annual environmental statement; and ▪ Communicate the key EMS structure and responsibilities to the Site Supervisor.	4.4.3 Communication
HSE Manager or delegate	Responsible for: ▪ Allocation of document owners; and ▪ Ensuring that reviews are undertaken within each document's defined periodically.	4.4 Documentation 4.5 Control of Document 4.5.4 Control of Records
	▪ Ensure that the defined Rathlin Energy practices and processes are communicated to all sites/assets.	4.4.6 Operational Control
	▪ Provide assistance and guidance in update and approval of Emergency Plans, co-ordinating this process if required.	4.4.7 Emergency Preparedness and Response
	▪ Ownership and maintenance of the internal auditing schedule; ▪ Facilitation of audit teams for all internal audits; ▪ Advising auditor of areas of focus for the year; ▪ Ensuring audits reports are kept and available for sharing; ▪ Analysing audit data and communicating system risks; and ▪ Facilitation of external audits.	4.5.5 Internal Audit
	▪ Attend and support the Director with Accountability for Health, Safety and Environment at the annual management review; ▪ Consolidate asset/site level management reviews for the Corporate annual management review; ▪ Track progress from the management reviews; and ▪ Keep records of all management review for minimum 5 years.	4.6 Management Review

Role	Key Responsibilities	Clause(s)
HSE Advisor	▪ Maintain the legislative register and ensure periodic reviews are undertaken according to the reviewed procedures.	4.3.2 Legal and Other Requirements
	▪ Liaise with national and international government departments and non-government organisation, pressure groups, the public and the media.	4.4.3 Communication
	▪ Identify potential risks associated with emergency conditions, including release of hydrocarbons; and ▪ Make the Site Supervisor aware of these risks, to ensure that they are incorporated in relevant emergency response plans.	4.4.7 Emergency Preparedness and Response
	▪ Carry out audits in line with procedures; ▪ Communicate the scope of the audit to the site; ▪ Review previous audits conducted at the site prior to the audit; ▪ Ensuring the report is entered into the server by sites and actions distributed; ▪ Approving action close-out and providing challenge where close-out is insufficient; and ▪ Ensuring the final report is filled in with the corresponding report number (see RE-03-001).	4.5.5 Internal Audit
	▪ Populate consents and permits register; ▪ Retain on file hard copy of consents/permits and if necessary, provide electronic copies; ▪ Notify the Operations Manager when expiration is due and seek assistance in a timely manner; ▪ Apply to the relevant authority in a timely manner for consents/permits, to ensure an adequate consultation period can be undertaken; and ▪ Issue consents/permits to ensure awareness of the conditions across the site.	4.3.2 Legal and Other Requirements
Site Supervisor	▪ Delivering the environmental activities contained within the plan.	4.3.3 Objectives, Targets and Programmes
	▪ Ensure implementation of site-specific operational controls.	4.4.6 Operational Control
	▪ Test the response plans on a regular basis; ▪ Record learning's from the exercises on the server; and ▪ Ensure the appropriate level of environmental training across the site is up to date.	4.4.7 Emergency Preparedness and Response
	▪ Manage non-conformances in their area of responsibility.	4.5.3 Non-conformity and Corrective and Preventative Action
	▪ Ensure that sufficient priority is placed on undertaking environmental audits.	4.5.5 Internal Audit
	▪ Attend the asset/site level annual management reviews.	4.6 Management Review