

Integrated Management System

PUK-SMS-COM-003

Document Owner Full Name: Function	Andy Denton : QSSHE Manager		
Revision Date	01/11/2025	Revision Number	Rev 11
Next Mandatory Review Date	01/05/2029	Review Period	5 Years
Approved Full Name: Function	Andy Denton : QSSHE Manager		

Uncontrolled When Printed

This Page Intentionally Blank

Contents

Section	Page
1.0 Purpose	7
2.0 Scope	7
3.0 Document Structure	7
4.0 Context of the Organization	8
4.1 Organizational Context	8
4.1.1 Context	8
4.1.2 Intended Outcomes	9
4.1.3 Context Analysis	9
4.1.4 Issue Identification	10
4.2 Needs and Expectations of Interested Parties	12
4.3 Scope of the IMS	12
4.4 Safety and Environmental Management System (SEMS)	13
5.0 Leadership and Commitment	15
5.1 Environmental Policy	15
5.2 Health and Safety Policy	15
5.3 Organisational Roles, Responsibilities and Authorities	15
5.4 Consultation and Participation of Workers	16
6.0 Planning	17
6.1 Actions to Address Risks and Opportunities	17
6.1.1 General	17
6.1.2 Risk Management	17
6.1.3 Compliance Obligations	18
6.1.4 Planning Action	19
6.2 IMS Objectives and Planning Actions	19
6.2.1 Management Systems Objectives	19

6.2.2	Planning Actions to Achieve Integrated management System Objectives	20
7.0	Support	21
7.1	Resources	21
7.2	Competence	21
7.3	Awareness	21
7.4	Communication	22
7.4.1	General	22
7.4.2	Internal Communication	22
7.4.3	External Communication	23
7.5	Documented Information	24
8.0	Operations	25
8.1	Operational Planning and Control	25
8.1.1	General	25
8.1.2	Eliminating Hazards and Reducing Risks	25
8.1.3	Management of Change	26
8.1.4	Procurement	26
8.2	Emergency Preparedness and Response	27
9.0	Performance Review	29
9.1	Monitoring, Measurement, Analysis and Evaluation	29
9.1.1	General	29
9.1.2	Evaluation of Compliance	30
9.2	Internal Audit	30
9.2.1	General	30
9.2.2	Internal Audit Programme	30
9.3	Management Review	31
10.0	Improvement	33
10.1	General	33
10.2	Incident, Nonconformity and Corrective Action	33
10.3	Continual Improvement	34

11.0 Assurance & Review	36
11.1 PUK Assurance Frame Work	36
11.2 Document Review	36

Appendices

Appendix A	Perenco UK Letter of Engagement
Appendix B	Abbreviations and Definitions
Appendix C	References and Links

Figure		Page
Figure 4-1	Structure Context Analysis Framework	10
Figure 4-2	Overview of ISO 45001:2018 Occupational Health and Safety Management System	14
Figure 8-1	Overview of ISO 45001:2018 Occupational Health and Safety Management System	25

Amendment Record

Rev. No	Issue Date	Incorporated by	Amendment Summary
01	15/06/2018	C. Goodman / G Nxumalo	
02	29/04/2019	Iain Brown	
03	May 2020	Ann-Marie Fowler	
04	May 2021	Ann-Marie Fowler	
05	Sep 2021	Luke Steaggles	
06	May 2022	Luke Steaggles	
07	Jan 2023	Ben Crussell	Change of document owner, non-content based revision.
08	Feb 2023	Marie Kindberg	Update to abbreviations, contents and Section 11 – Assurance & Review and Assurance Protocol added.
09	June 2023	Ben Crussell	Change of document owner, non-content based revision.
10	May 2025	Chris West	Full revision to Integrated Management System
11	October 2025	Mia Fitzgerald	Update to add in 'QSHE Interface RACI' – Appendix D

1.0 Purpose

This document details:

- The overall Integrated Management System (IMS) structure and processes implemented by Perenco UK Southern North Sea (PUK-SNS) and its contractors whilst carrying out the activities described in Section 4.3;
- Key IMS procedures and practices;
- The arrangements for the administration of the IMS;
- How the IMS detailed above conforms to the requirements of International Standard ISO 14001:2015 Environmental Management System and ISO 45001:2018 Occupational Health and Safety Management Systems - Requirements with guidance for use.
- The integration of Perenco UK Occupational Health and Safety management system and Environmental management system into a combined system and approach.

2.0 Scope

This document applies to PUK-SNS, as described in Section 4.3.

3.0 Document Structure

The following sections of this document are structured to reflect the clauses of the International Standard ISO 14001:2015 Environmental Management System and ISO 45001:2018 Health and Safety Management Systems - Requirements with guidance for use standard, to simplify cross referencing with the standard.

4.0 Context of the Organization

4.1 Organizational Context

4.1.1 Context

Perenco UK Southern North Sea (PUK-SNS) is part of Perenco UK Ltd (PUK), a registered company which is a holding of Perenco, an independent oil & gas company with operations in Northern Europe, Africa, South America and Southeast Asia. Perenco is involved in oil and gas operations both onshore and offshore.

PUK-SNS's key strategic objective or 'its purpose' is to efficiently produce natural gas resources from mostly mature or declining gas fields by careful management and life extension of aging facilities in line with the North Sea Transition Authority (NSTA) Maximising Economic Recovery Strategy. This includes looking at novel in-house techniques for the safe decommissioning and disposal of assets, and ensuring we achieve the UK Net Zero commitments.

The PUK-SNS core business involves extraction of natural gas, and associated fluids, from offshore gas fields and processing onshore to sales gas specifications for entry into the National Transmission System (NTS).

In the North Sea, PUK-SNS operates a number of attended offshore gas fields and associated infrastructure. These fields are operated from a number of 'hubs', these are:

- Leman 27B Normally Attended Installation (NAI) and its associated satellite Normally Unattended Installation (NUI) fields.
- Cleeton NAI and its associated NUIs and subsea tiebacks.
- Ravenspurn North NAI and its associated NUIs.
- West Sole Alpha, which can be manned but predominately operated as a NUI and its associated NUIs, include the LAPS area.

There are also several assets shutdown waiting Cessation of Production (CoP) or in active decommissioning. PUK-SNS's gross gas production is estimated to be 35,000 barrels of oil equivalent per day (boepd) on an annual basis.

The main business products are natural gas fluids with highly flammable gases and liquid gas condensate. Natural gas is supplied to the NTS whilst liquid hydrocarbons are exported for sale as feedstock for catalytic cracking and fuel.

In addition to its own gas, and that of its joint-venture partners, PUK-SNS transports a significant quantity of third-party gas through its operated infrastructure and its two operated gas terminals, Bacton and Dimlington.

Perenco UK Ltd also holds a 90% interest in the Wytch Farm and Wareham fields, and a 100% interest in the Kimmeridge field at the Wytch Farm oil field in Dorset. As Wytch Farm is operated separately to PUK-SNS, it is considered outside the scope of this document.

4.1.2 Intended Outcomes

The intended outcomes of the IMS are detailed in the Perenco Health Safety and Environmental Policies, which are updated on a bi-annual basis or when there has been a significant change in operations. To summarise, the intended outcomes of the IMS are to;

- Operate in a safe and productive manner;
- Support an enhancement of occupational health, safety and environmental performance in all areas of control and areas of influence (such as through contractors and supply chain);
- Prevent occupational health, safety, and environmental incidents through elimination of Hazards and minimisation of Risk;
- Ensure conformance to legal compliance obligations;
- Fulfil management system objectives; and
- Meet the Net Zero goals.

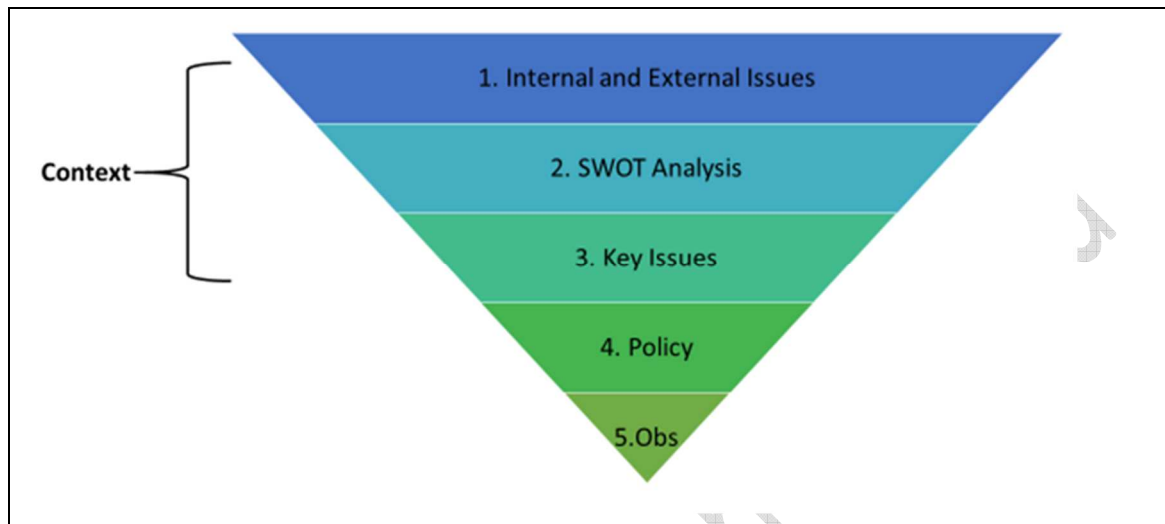
4.1.3 Context Analysis

To determine the context of the organisation in relation to ISO 14001:2015 and ISO 45001:2018, it is important to identify the internal and external issues that can affect the organisation and interested parties. To do this PUK-SNS uses a 'Structured Context Analysis Framework', as displayed in figure 4-1. These documents are reviewed on a bi-annual basis or when a major change has occurred. This framework uses the following:

- (1) PUK-SNS internal risk management processes to identify the internal factors that pose opportunities and risks;
 - Environmental Risk Management processes can be located within SEMs under "Compliance" and are prefixed with PUK-SMS-COM-"XXX". These are summarised within the Environmental Risk and Opportunity Assessment Procedure (PUK-SMS-COM-004)
 - Occupational Health and Hygiene Risks Management processes can be located within SEMs under "Occupational Health" and are prefixed with PUK-SMS-OH-"XXX". These are summarised in the Management of Occupational Health and Hygiene Risks Procedure (PUK-SMS-OH-018)
 - Safety Risks Management processes can be located within SEMs under "Risk Management" and are prefixed with PUK-SMS-RM-"XXX". A procedure to summarise these processes is in draft, however a SEMs mapping guide is available to aid in process identification.
- (2) Political, Economic, Social, Technology, Legal, and Environmental (PESTLE) analysis management framework to analyse the key external factors influencing PUK-SNS from the outside. This includes the needs of interested parties.
 - PUK-SMS-COM-003-01 - PUK PESTLE to understand Organisational Context
- (3) A planning tool to distil items identified in the preceding two processes and categorise internal and external using a Strengths, Weaknesses, Opportunities and Risks (SWOT) analysis.
 - PUK-SMS-COM-003-02 – PUK SWOT Analysis

Once key issues are identified, these form the basis for the Health, Safety and Environmental Policies, and input into the development of annual Health Safety and Environmental objectives.

Figure 4-1 Structure Context Analysis Framework



4.1.4 Issue Identification

A summary of the output of the structured content analysis is detailed below;

Internal:

The organisations internal context is the environment in which it aims to achieve the strategic objectives. Several issues that can influence the intended outcome of the management system are listed below;

- PUK-SNS facilities have a large age range, therefore management of spares and maintenance can be an issue;
- PUK-SNS is a predominately NUI based organisation;
- Several PUK-SNS facilities have reached, or are approaching, the end of their economic life, and decommissioning activity is an increasing component of the business;
- PUK-SNS use another part of the Perenco Group, Petrodec, as a contractor to execute the decommissioning work scope;
- PUK-SNS organisational culture and mix of companies the organisation was developed from;
- PUK is a privately owned company.

External:

The organisations external context is influenced by issues that arise from PESTLE issues. Some of the issues that can influence the intended outcome of the management system are;

- PUK-SNS activities are regulated under UK legislation. The key regulators are the Health and Safety Executive (HSE), Department for Energy security and Net Zero (formerly Department for Business, Energy and Industrial Strategy (BEIS) and the Environment Agency (EA), with the NSTA being responsible for main production licensing and consents.
- Changing legislation or increased requirements and expectations as part of the existing legislation. This may be driven by political changes and preferences, both domestically and globally.
- The NSTA work with PUK-SNS to determine when an asset can be put forward for CoP. They also provide a positive influence on extended life project providing economic drivers.
- The business is subject to significant variations in gas pricing over time that can affect the level of activity and investment.
- PUK-SNS operations in the Southern North Sea (SNS) are conducted in proximity to several designated coastal and marine protected areas.
- The organisation procures products and services for its operations. The extent of its influence on suppliers for services provided outside of PUK-SNS facilities is deemed to be limited to those issues which have a direct bearing on the environment, for example waste disposal, chemicals and equipment specifications. Influence in the supply chain is highlighted, where relevant, in the Life Cycle Perspective of the Aspects and Impacts Register;
- Divestment potential; and
- Critical skill shortages and ability to succession plan due to aging societal workforce and the perception of the oil and gas industry in new entrants to the workforce.

Environmental Conditions:

Environmental conditions affect PUK-SNS's activities and services and the key conditions that can bring risk have been identified as:

- Erosion of the cliffs and sea level rise in the vicinity of the terminals;
- Fog restricting the crew changes and vessels being worked;
- Frequency of 10-100-year storms increasing and affecting integrity of platforms;
- Storms restricting work outside and on drilling rigs including snowstorms;
- Strong currents and poor visibility restricting subsea operations;
- Changing seabed conditions pose challenges with regards to key pipeline stability, this can be either gradual change or more immediate events from storms.

As climate change predictions in the UK suggest that we can expect more extreme weather, including a higher frequency of storms and changes in rainfall patterns and intensity, environmental conditions are likely to pose an increased challenge. To assess the potential impacts of climate change, a detailed risk assessment 'Climate Change Risk Assessment' has been completed for PUK-SNS's onshore sites.

Bacton SNS-1012003

Dimlington SNS-1011985

Health Conditions:

Health conditions affect PUK-SNS's activities and services and the key considerations that can bring risk have been identified as:

- Aging workforce
- Chemical agents
- Physical agents
- Biological agents
- Psychosocial

Safety Conditions

Safety conditions affect PUK-SNS's activities and services and the key considerations that can bring risk have been identified as:

- Major Accident Hazards
- Personal Safety
- Process Safety
- Behavioural Safety
- Human Factors
- Cyber and Physical Security

4.2 Needs and Expectations of Interested Parties

PUK-SNS understands that there are several parties with interest in the organisation and its Health, Safety and Environmental performance. These organisations are identified in PUK-SMS-COM-026 Stakeholder Management. This document also identifies the needs and expectations of these interested parties, and documents which of these are deemed by PUK-SNS to constitute its legal compliance obligations.

4.3 Scope of the IMS

The IMS described in this document covers PUK-SNS activities, products and services, arising during:

- The exploration, production, processing, transport and storage of natural gas and condensate; and
- The design, construction, commissioning, operational and decommissioning phases of facilities to carry out the above activities at the following locations:
 - Offshore manned platforms and NUIs, and associated pipelines and subsea systems;
 - Other remote or standalone well locations;
 - Dimlington Terminal and associated onshore pipelines;
 - Bacton Terminal and associated onshore pipelines;
 - Onshore warehouses and workshops; and
 - Onshore office support Norwich.

The scope of the IMS includes those activities that PUK-SNS controls. The scope includes work carried out at PUK-SNS facilities by contractors and work within an offshore platform 500m exclusion zone when activities are controlled by PUK-SNS. Where PUK-SNS has overall control but contractors are coming in and out of the 500m zone, such as Emergency Response and Recovery Vessels (ERRV), then a bridging arrangement will be in place and the vessel will operate under its own procedures. A similar arrangement will be in place for drilling contractors, whilst they are under the umbrella of the IMS the drilling rig will operate under a Combined Operations Process (COMOPS), which includes the Safety and Environmental Management System (SEMS) bridging document.

Where PUK-SNS has influence rather than control, it will use this influence to drive and support Health, Safety and Environmental improvements in the contracting base and supply chain.

The scope also includes the impact of our operations on our interested and affected parties and how we manage and maintain those relationships.

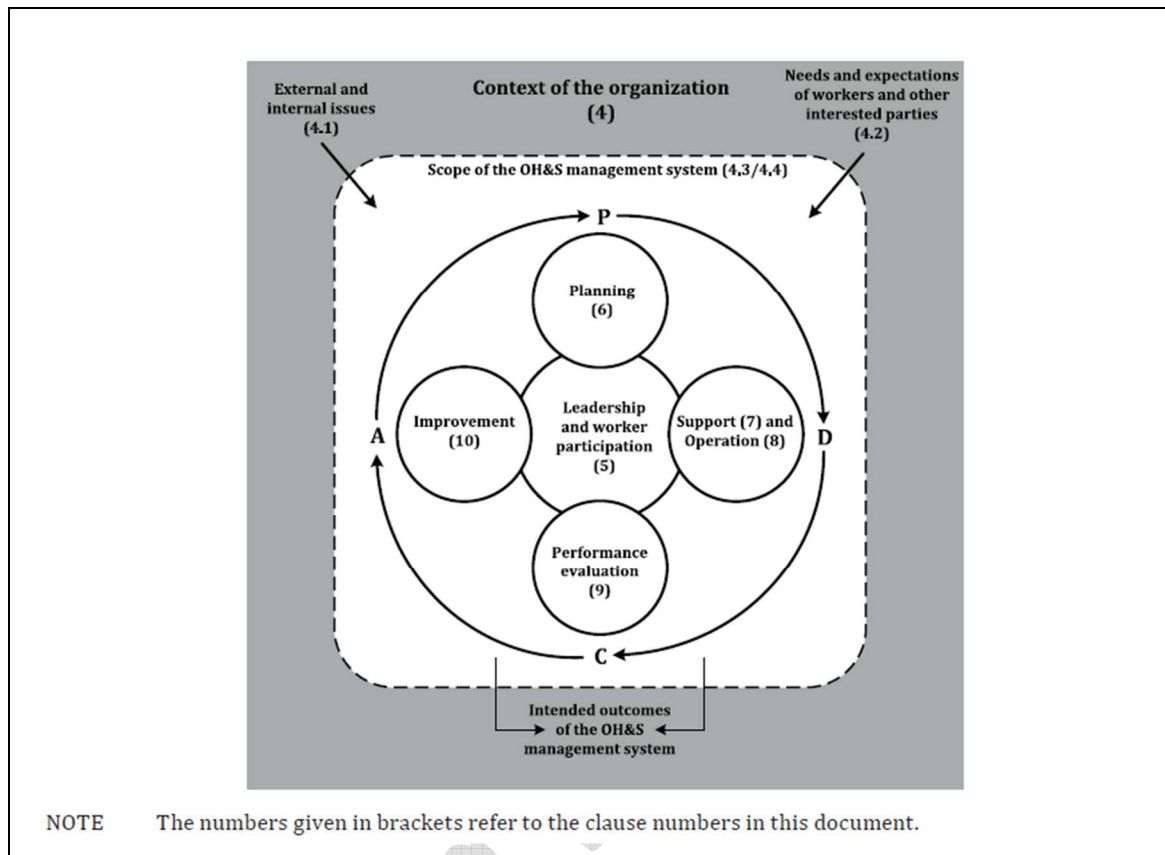
The scope of our IMS is available to interested parties on request either directly or via the regulator.

4.4 Safety and Environmental Management System (SEMS)

The IMS is a component part of PUK-SNS SEMS. Some elements of the IMS consist of standalone procedures, whilst others are integrated into existing operational systems and procedures.

Figure 4-2 provides an overview of the IMS in accordance with ISO Plan-Do-Check-Act Cycle, with reference to the relevant following sections of this document.

Figure 4-2 Overview of ISO 45001:2018 Occupational Health and Safety Management System



5.0 Leadership and Commitment

The PUK-SNS General Manager, delegated to the Operations Director, is accountable for:

- The effectiveness of the IMS;
- Ensuring that the Health, Safety and Environmental policy and objectives are established and are consistent with the strategic direction and context of the organization;
- Ensuring the integration of the IMS requirements into business processes;
- Ensuring that the resources required for the IMS are available;
- Communicating the importance of effective health, safety and environmental management and conforming to the IMS requirements;
- Ensuring that the IMS achieves its intended outcomes;
- Directing and supporting persons to contribute to the effectiveness of the IMS;
- Promoting continual improvement;
- Supporting other management roles to demonstrate their leadership as it applies to their areas of responsibility; and
- Ensuring that the responsibilities and authorities for relevant roles are assigned and communicated within the organisation.

5.1 Environmental Policy

The PUK Environmental Policy is detailed in PUK-SMS-COM-019 Environmental Policy. This policy is displayed at all company premises, including offshore facilities, and communicated to all staff and contractors during the induction process. The policy is also available to interested parties upon request.

5.2 Health and Safety Policy

The Perenco Group Health and Safety Policy is detailed in the group QSHE Management system, linked to SEMs via “Corporate Policies”. This Policy is displayed at all company premises, including offshore facilities and communicated to all staff and contractors during the induction process. The Policy is also available to interested parties upon request and on the Perenco Group Website.

5.3 Organisational Roles, Responsibilities and Authorities

The PUK-SNS QSSHE Manager has delegated responsibility for:

- The administration of Health, Safety and Environmental management in PUK-SNS;
- Ensuring that the IMS conforms to the requirements of ISO 14001:2015 and ISO 45001:2018;
- Monitoring the performance of the IMS, and reporting this to the General Manager;
- Providing guidance on Health, Safety and Environmental management; and
- Taking corrective action when necessary and revising procedures for which that person is the Document Owner.

Environmental Team is responsible for:

- Implementing environmental management procedures and practices;
- Arranging the annual Environmental Management Review;
- Monitoring performance of the IMS and environmental performance; and
- Providing guidance on environmental management issues in their areas.

Operational Safety Team is responsible for:

- Implementing safety management procedures and practices;
- Arranging monthly QSHE Performance review;
- Arranging weekly QSHE Performance review;
- Monitoring performance of the IMS and Safety performance; and
- Provide guidance on safety management issues in their areas.

Occupational Health Team is responsible for

- Implementing occupational health management procedures and practices;
- Monitoring performance of the IMS and occupational health performance; and
- Developing and implementing occupational health strategies.

Defined roles and responsibilities between QSHE teams and wider Perenco are outlined within the 'QSHE Interface RACI' (see Appendix D).

5.4 Consultation and Participation of Workers

Specific roles and responsibilities for personnel are set out in each procedure within SEMS.

Contractors are made aware of the extent and limitation of their area of responsibility through contractual procedures, work planning, pre-job conversations, briefings and toolbox talks.

It is the responsibility of line managers and the Human Resources (HR) department to ensure that, where relevant, health, safety and environmental responsibilities are included in job descriptions and annual objectives and that the annual staff appraisal process reflects Health, Safety and environmental performance and training needs. The Training Coordinator is responsible for the management of training programs and the maintenance of Training Records.

6.0 Planning

6.1 Actions to Address Risks and Opportunities

6.1.1 General

The fundamental basis of the IMS is to provide PUK-SNS with a framework within which to address its risks and opportunities, by integrating Health, Safety and Environmental management into the organization's business decision making process and strategic direction.

The core elements of this framework are documented in a number of SEMS procedures, which determine the risks and opportunities related to the organisation's health, safety and environmental aspects (Section 6.1.2) and compliance obligations (Section 6.1.3), considering the context of the organization (Section 4.1), needs and expectations of interested parties (Section 4.2), and the scope of the IMS (Section 4.3).

6.1.2 Risk Management

Environmental

The PUK-SMS-COM-004 Environmental Risk procedure describes the process for identifying the environmental risks and opportunities, 'aspects', of PUK-SNS activities and determining which aspects have a potentially significant environmental impact.

Occupational Health

The PUK-SMS-OH-018 Management of Occupational Health and Hygiene Risks procedure describes the processes established, implemented and maintained for the hazard identification for Occupational health and Hygiene risks and opportunities.

Safety

The multiple processes documented within SEMs Risk Management section, document prefixed with PUK-SMS-RM-"XXX", describe the processes established, implemented, and maintained for the hazard identification for Major accidents and Personal Safety risks and opportunities. Safe systems of work are described within SEMs Control of Work Section, document prefixed with PUK-SMS-OWC-"XXX".

Holistic Assessments

It is important to note that several other SEMS procedures document risk assessment processes that may include the identification and assessment of health safety and environmental aspects for specific activities or projects. The method of assessment of significance used in these processes must be consistent with that described within the core documents listed above.

These include, but are not limited to:

- PUK-SMS-RM-005 HAZID/ENVID Procedure and PUK-SMS-RM-001 Guidance on HAZOP, which detail the process for identification of safety and environmental

hazards during the Hazard and Environmental Identification Study (HAZID/ENVID) and Hazard and Operability Study (HAZOP) processes.

- PUK-SMS-RM-002 Layers of Protection Analysis, which details the method for evaluating the effectiveness of independent protection layers (control systems, alarms and safety instrumental systems, pressure valves, bunds etc.) in reducing the frequency or consequence of hazardous events.
- PUK-SMS-PRJ-001 Project Management Procedure which governs the management of projects, including environmental risk assessment, risk prevention, control and mitigation measures.
- PUK-SMS-RM-004 Inherently Safer Design describes the process for hazard prevention and control in projects by safer design.
- PUK-SMS-RM-003 Total Risk Management Review describes the process for ensuring risk and opportunities are highlighted early in the project processes.

6.1.3 Compliance Obligations

PUK-SNS subscribe to a legislation update service provided by Simplifi-Solutions, which has an online database of applicable regulations and guidance relevant to the industry. The service provides regular updates and notifications of changes, which must be reviewed to confirm relevance and impact. Once assessed, relevant legislation forms part of the Legal Register and is mapped to, for example, appropriate SEMS procedure(s) or other documents. This online database of applicable regulations and guidance allows PUK to assess compliance.

For major projects, PUK-SNS Environmental Team also utilise the Weston PLANC Manager, which allows the identification and tracking of permits, licences and consents.

Key compliance obligations are also detailed in a number of SEMS procedures that address compliance with key regulations. These are signposted against the relevant item of legislation in the Simplified Solutions database.

Where compliance obligations result in risks and opportunities being identified, these are assessed in the process described in Section 6.1.2.

Legislative Relevance

The relevance of the legislation to the organisational context is categorised within the register utilising the following criteria:

- Yes - Applicable to organisation.
- No - Not applicable to organisation.

Legislative Risk Consequence

The Risk factor presented to the organisation by the associated legislation is categorised within the register utilising the follow criteria:

- Severity of potential consequence as defined within PUK-SMS-MOI-001 Appendix A. Severity is Ranked 1-5 depending on the potential risk consequence presented by non-compliance, modelled against the potential impact to Health Safety and Environmental.

Legislative Compliance

The IMS compliance to the legislation itself is captured within the register utilising the following criteria:

- **Not Assessed** – No assessment has been made against the organisations IMS and the legislation.
- **Non-compliant** – The assessment has identified significant gaps between the reorganisations IMS and the legislation.
- **Partially compliant** – The assessment has identified opportunities for improvement and actions have been raised align the IMS fully to legislation.
- **Fully compliant** – The assessment has identified the IMS is fully compliant with legislation, requiring periodic review.

Legislative Review

It is the joint responsibility of the Operational Safety Team Lead, Occupational Health Lead and Environmental Lead to administer the register and ensure that the legislation within their respective fields is maintained.

6.1.4 Planning Action

Risk and Opportunities

PUK-SNS establishes Health, Safety and Environmental objectives to address its significant aspects, compliance obligations and identified risks and opportunities. The process for doing this is described in more detail in Section 6.2.

Legal Requirements

In addition to the process described within section 6.1.3 for the management of legislation, the organisation describes the process for addressing legal actions within PUK-SMS-COM-037 Management of Regulatory Interventions & Commitments.

Emergency Response:

Emergency response is covered within SEMS PUK-SMS-ER-001 PUK-SNS Emergency response Strategy.

Action Tracking:

Action tracking is provided by the PTRAC tool as described within Section 10.2.

Effectiveness Review:

The organisation evaluates the effectiveness of objectives and actions via the methods described within Section 10.2.

6.2 IMS Objectives and Planning Actions

6.2.1 Management Systems Objectives

As part of its normal business processes and in line with company Policy, PUK-SNS sets annual health, safety, and environmental objectives to improve performance and reduce the impact of operations these elements.

Objectives take account of:

- The organisations strategic business objectives set by Perenco Group (Reference:CORP-HSE-REG-001)
- Significant risks identified in the Environmental Aspects and Impacts Register that are not controlled to As Low as Reasonably Practicable (ALARP) or Best Available Techniques (BAT) standards;
- Significant risk identified in the Major Accident Hazard Risk Register.
- Business risks relating to continuing non-compliance with regulations and PUK-SNS standards;
- New projects with potential health, safety and environmental consequences;
- Outcomes of audits and reviews that point to the need to strengthen health, safety and environmental management including procedures and practices;
- The organisation's business risks and opportunities.
- Industry expectations around Net Zero;

SMART Objectives

Objectives shall be Specific, Measurable, Achievable, Resourced and Time-bound (SMART). The objectives will be documented with annual Environmental Objectives and Targets plans available on QSHE Communications. Where appropriate, this will be translated into the SNS QSSHE Plan, Installation QSSHE Plan, Project Plans or Operations Support & Engineering Plan. Progress against objectives will be regularly monitored by the plan owner and reported at the Annual Management Review, which forms part of the continual improvement process detailed in Section 10.3.

Published Objectives

Objectives are published on SEMS as a supporting document to this procedure with reference PUK-SMS-COM-003-03

6.2.2 Planning Actions to Achieve Integrated management System Objectives

Objectives shall be supported by work plans that break down what will be done, the resources required, who is responsible, when they will be achieved, and how the results will be evaluated, including indicators to evaluate and demonstrate the progress towards achieving each objective.

Objectives may be phased where appropriate. For example, as a first step, a feasibility study that considers technological options and cost-benefits.

The QSSHE Manager is responsible for preparing the draft objectives in consultation with Department Managers. Progress against objectives and Key Performance Indicators (KPIs) (see section 9.1) are discussed at the Monthly Operational QSHE Leadership meeting.

The Annual Management Review discusses progress on the objectives and considers the themes for the following year. It also reviews the effectiveness of the previous year's objectives.

The organisation maintains and retains all documentation associated with these objectives on SEMS and within QSHE Central drives.

7.0 Support

7.1 Resources

It is the delegated responsibility of the PUK-SNS Operations Director, together with the QSSHE Manager, to provide sufficient resources to establish, implement, maintain and continually improve the IMS.

Roles and responsibilities related to the IMS are discussed in Section 5.3.

7.2 Competence

The competency management process is described in PUK-SMS-PTC-004 Policy for the Management of Safety and Environmentally Critical Competencies, which details the overall PUK-SNS approach to competency management at operated sites. This procedure sets out how PUK-SNS aims to ensure compliance with company standards, current regulations and good practice.

The PUK-SNS Competency Assurance Process (PCAP) database identifies and tracks competency requirements for key roles. This includes competencies of persons doing work that can affect the organisation's environmental performance or ability to fulfil its compliance obligations. In addition to PCAP, HR Training Records are maintained by line management and HR to demonstrate the competencies of all personnel, including key contractors.

Specific competencies for Offshore Installation Managers (OIMs) are detailed in procedure PUK-SMS-PTC-003 OIM Competence and Appointment, which includes requirements for Managing HS&E and Emergency Response.

PUK-SMS-PTC-005 Incident Management Team Competence specifies the experience and training requirements for the various roles undertaken by responders during an incident. This includes environmental competency requirements of specific Incident Management Team (IMT) roles.

When accessing the SEMS through the Intranet, the SEMS reading list groups SEMS procedures by role. It is the responsibility of everyone to maintain familiarity with SEMS procedures identified in this list as relevant to their role.

7.3 Awareness

The PUK-SNS Health and Safety Policy, and Environmental Policy PUK-SMS-COM-019, are communicated to all employees, contractors and suppliers through the company induction (PUK-SMS-PTC-001 Employee Induction Procedure) and contract award processes.

The Environmental Aspects and Impacts Register is communicated to specific personnel at each site, as detailed within PUK-SMS-COM-004 Environmental Risk, to ensure that significant environmental aspects, potential impacts and associated control and mitigation measures are understood by those in control of the related work. This process also identifies the risks and opportunities associated with significant environmental aspects.

For Environmental specific sections of the IMS, awareness training is provided to key personnel to give an overview of the IMS and aid familiarisation with key procedures, this is included in the Environmental Onshore & Offshore Computer Based Training (CBT) modules.

Awareness of site Health Safety and Environmental requirements and standards are provided through the site HSE induction process (PUK-SMS-PTC-001 Employee Induction Procedure, SNS-1011193 Bacton Induction Process, Dimlington Induction CD & Site Standards Handout), and PUK-SMS-COM-006 Operational Environmental Standards.

7.4 Communication

7.4.1 General

The following sections describe the processes for internal and external communication related to the IMS.

7.4.2 Internal Communication

The PUK-SNS QSSHE Manager, delegated to the Occupational Health, Operational Safety and Environmental Team, is responsible for ensuring communication of IMS information among the various levels and functions of the organization, using established communication channels, including:

- QSSHE Weekly Report issued by PUK-SNS QSSHE Manager;
- Attendance at the asset 'morning calls';
- Monthly KPI report;
- QSSHE Team site visits;
- Safety and Environmental Alerts, Bulletins and Safety Flashes.
- The Major accident hazards register described within PUK-SMS-COM-039
- The Environmental Aspects and Impacts Register, as described in PUK-SMS-COM-004 Environmental Risk Assessment; and,
- Ad hoc advice to site managers on environmental management issues during formal and informal meetings, phone calls and discussions as required.

Operational Line Managers are responsible for ensuring communication of IMS information within their areas of responsibility. This includes information related to:

- The management of health, safety and environmental risks;
- Health, safety, and environmental compliance obligations; and,
- Roles and responsibilities, including competency, training & awareness.

This communication should utilize routine communication mechanisms such as, Teams meetings, pre-job risk assessments, toolbox talks and town hall meetings. Line Managers may routinely utilize QSSHE personnel to assist with this process.

The PUK-SNS observation Safety technique is also promoted across the organisation as an alternative method of communication for the work force, allowing for contribution to continual improvement and the reporting of unsafe conditions or acts, positive health

safety and environmental behaviours, and improvement ideas. This process is described within PUK-SMS-COM-031 Behavioural Safety Observation Programme.

PUK-SNS has a legal obligation to adhere to SI971 for the use of Elected safety Representative offshore. The regulations are written for Manned assets, however, to promote internal communication the organisation extends the role to all elements of the business. Including, NUI/W2W operations, Warehouse, Norwich Office and the terminals. This line of communication is described within PUK-SMS-PTC-002 Elected Safety representatives' procedure.

7.4.3 External Communication

PUK-SNS does not routinely communicate externally about its significant health safety and environmental aspects, with the following exceptions:

- Publication of an Annual Public Statements to report environmental performance for offshore facilities as required by OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems by the Offshore Industry to produce a Public Statement;
- Publication of an Annual Report to describe the environmental performance for onshore terminals as required by the Environmental Permitting (England & Wales) Regulations 2010 (as amended) and the associated Environmental Permitting Regulations (EPR) Permit for each facility;
- Inclusion of Green House Gas (GHG) data in the PUK Annual Directors Report as required by the Streamline Energy & Carbon Reporting (SECR) scheme;
- Environmental and Emissions Monitoring System (EEMS);
- Publication of information to meet other regulatory requirements, for instance related to new developments, decommissioning projects etc. This might include issue of Public Notices, stakeholder consultation activities and publication of an Environmental Statement (ES); and,
- Publication of information on a case-by-case basis in response to requests for information from external parties. These include information requests from the regulators as part of inspections or investigations (OPRED, HSE, EA, CAA).
- Injury and Incident data submitted to OEUK as part of their Quarterly Personal Injury Data Request for the industry.
- As part of bi-annual presentations call Operations Consultation Meetings (OCM's) to our commercial partners in relation to the assets to which they have a financial investment in.
- To the NSTA as part of Appendix C submission, which form part of a request to transfer well operator.

PUK-SNS has identified stakeholders and parties with an interest in the PUK-SNS IMS and environmental performance. As far as possible, a single point of contact has been allocated for each party. These are identified in PUK-SMS-COM-026 Health Safety and Environmental Stakeholder Management.

Stakeholders and interested parties may include:

- Regulatory authorities, particularly the Health and Safety Executive (Offshore and COMAH), Department for Energy Security and Net Zero and the EA;
- Statutory Consultees: Joint Nature Conservation Committee (JNCC), Centre for Environment, Fisheries and Aquaculture (CEFAS), Regional Sea Fisheries Committees, Natural England, local District Councils;
- Local communities and Parish Councils;
- Non-Governmental Organisations (NGOs);
- Offshore Energies UK (OEUK) (formerly Oil and Gas UK);
- Partners and joint ventures; and,
- PUK-SNS staff and contractors.

Protocols for communication with regulators are set out in PUK-SMS-COM-037 Management of Regulatory Interventions & Commitments. Routine information reporting required by regulatory agencies is covered by PUK-SMS-COM-005 Offshore Environmental Permit Compliance, PUK-SMS-COM-011 Onshore Environmental Permit Compliance and PUK-SMS-MOI-001 Incident Reporting & Investigation.

Complaints or queries communicated to onshore terminals are dealt with in accordance with the Bacton and Dimlington complaints procedures.

7.5 Documented Information

PUK-SNS arrangements for maintaining, reviewing, updating and storing documents and identification, storage, retrieval and disposal of records are detailed within PUK-SMS-DCC-004 PUK Document Retention and Disposal Policy and PUK-SMS-DCC-006 PUK Document Control and Records Management Policy.

8.0 Operations

PUK-SNS maintains documented processes governing the planning and control of operational activities, as well as the preparation and response to emergency situations.

8.1 Operational Planning and Control

All planned activities are governed by documented procedures or systems, as detailed below.

8.1.1 General

Operations

Operational activities are controlled by a suite of PUK-SNS procedures, installation operating procedures, and other systems and processes.

Projects

The control and management of 'Projects' is governed by PUK-SMS-PRJ-001 Project Management Procedure, which covers the design, procurement, construction and commissioning phases of all project supported modifications. Within this project process, specific plans and procedures may be developed for each project.

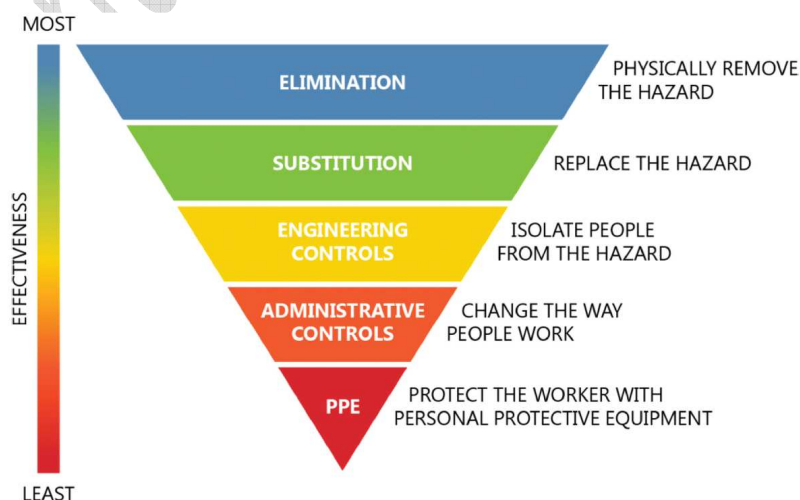
Decommissioning

The control and management of decommissioning activities are governed by PUK-SMS-PRJ-002 Decommissioning Strategy and the PUK-SMS-PRJ-006 End of Life (EoL) Offshore Decommissioning document.

8.1.2 Eliminating Hazards and Reducing Risks

The methods PUK-SNS use to eliminate and reduce risk are formed around the principles of the hierarchy of controls.

Figure 8-1 Overview of Hierarchy of Controls



The application of these principles are defined within PUK-SMS-OH-018 Management of Occupational Health and Hygiene Risks, PUK-SMS-RM-“XXX” Risk management procedures, PUK-SMS-OWC-“XXX” Control of work procedures, and PUK-SMS-COM-004 Environmental Risk and Opportunity Assessment Procedure.

8.1.3 Management of Change

The management of change process assesses the potential risk or impact of changes to plant, process and equipment. In PUK-SNS this is governed by PUK-SMS-MOC-001 Management of Change, which is implemented through the Perenco electronic Management of Change (PeMOC) online system. The impact of change on health safety and environment aspects is captured in this process and those items are allocated to an appropriate QSSHE Advisor to review.

8.1.4 Procurement

Contractors

The provisions for the management of contractor are outlines within PUK-SMS-COM-046, PUK-SNS-Contractor Management Procedure.

Outsourcing

PUK-SNS uses several third-party products and services, including service providers who carry out activities on PUK-SNS facilities.

The system describing these elements of the supply chain management are defined within the documents within PUK-SMS-SCM-XXX.

Key procedures of importance are:

- PUK-SMS-SCM-002 – SNS PUK Supply Chain Procurement Procedure

The purpose of this document is to ensure that PERENCO UK (PUK) Supply Chain Management is effective in the purchase and delivery of materials and services at the most efficient cost, consistent with quality, time control and PUK procedures. The goal being the promotion of the company's best interest through intelligent action and fair dealing, utilising the highest ethical standards and in accordance with all applicable laws and regulations. This policy is aimed to help, as a guideline, to all personnel involved in the purchasing of material and services within SAP regardless of the department(s) they are assigned to. The intention is to clarify the supply chain management process and to highlight obligations and responsibilities. This document outlines the processes needed to achieve a seamless supply chain process. The aim of this document is to provide clear instructions that cover the procurement process.

- PUK-SMS-SCM-003 – Vesting Certificate Process

The purpose of this document is to ensure there is a consistent and controlled approach with defined standardised process to ensure that all reasonable risks are mitigated when Perenco UK LTD(PUK) owned materials are stored at a supplier's premises.

- PUK-SMS-SC-009 – Vendor Creation Request Procedure

The purpose of this document is to ensure there is a consistent and controlled approach, with defined financial and quality checks applied, to ensure that due diligence is undertaken when onboarding a new vendor to the PUK Approved Vendor List.

It is the responsibility of the department requesting the product and/or service, assisted by QSSHE and procurement personnel, to ensure any third party/service provider has in place an HSE Management System of their own that meet PUK-SNS Quality Guidelines.

PUK-SNS Approved Vendor List (AVL) holds copies of third party/service providers ISO14001 and ISO9001 certificates and prior to placement of any contract these must be checked for validity by department/QSSHE/Procurement.

The Services Master Agreement for third party contracts details standard QSSHE requirements placed on third parties by PUK-SNS and provides an overview of interface requirements between PUK-SNS and the third party. In certain cases, additional requirements may be issued to address specific risks or issues.

PUK-SNS-AS-001 PUK Assurance Programme details the requirements for approval of third-party vendors, including verification of safety and environmentally critical services.

Products and Services

PUK-SNS has considered the need to provide information about potential significant environmental impacts associated with the transportation and delivery, use, end of life treatment and final disposal of its products and endeavours to take a life cycle perspective view where possible. These products are natural gas, supplied to the national grid, and liquid hydrocarbons exported for sale as feedstock for catalytic cracking and fuel. Due to the hazardous nature of these products, there are strict controls placed around their onward transportation. The potential environmental aspects of natural gas combustion are widely appreciated, as are the potential impacts of use of liquid hydrocarbons as cracking feedstock. Therefore, PUK-SNS has determined that the provision of further information associated with its products is not necessary.

8.2 Emergency Preparedness and Response

Emergency preparedness and response is key to the Perenco business and is driven by company and legislative requirements. Key legislative requirements are identified in the legislation register on Simplifi.

Emergency preparedness and response measures are documented in several of PUK-SNS procedures and installation operating response plans. The Aspect Registers references specific procedures relevant to the individual environmental aspects and the following documents are available on SEMS:

- Installation Emergency Response Plans detail the offshore response to an incident;
- PUK-SMS-ER-003 SNS Incident Management Plan details the onshore response to an incident and the support response operations;
- Installation Offshore Oil Pollution Emergency Plans (OPEPs), consisting of Action Plans (detailing steps to be taken in the event of a spill) and Non-Operational Handbooks (providing supporting information);

- UKCS-EM-015 Onshore Oil Pollution Emergency Plan, detailing the onshore response to an offshore spill and to support offshore response operations;
- 114-00004-005 Dimlington Terminals Emergency Response Plan details the response to an incident at Dimlington Terminal;
- 808-138273-001 Dimlington Terminals Pipeline Emergency Procedures details the response to an incident involving the offshore pipelines terminating at Dimlington Terminal;
- Dimlington Terminal Off Site Control of Major Accident Hazards (COMAH) Plan, detailing the attendance of emergency services and the interaction with other organisations, including the public, during an incident at Dimlington Terminal;
- PUK-BAC-ERP-001 Bacton Terminal Emergency Response Plan details the response to an incident at Bacton Terminal;
- XXX-MA-L-10000 Bacton Pipelines Emergency Procedures details the response to an incident involving the offshore pipelines terminating at Bacton Terminal; and
- Bacton Terminal Complex Off Site COMAH Plan detailing the attendance of emergency services and the interaction with other organisations, including the public, during an incident at Bacton Terminal.

Immediate response and mitigation measures, including those to mitigate health safety and environmental impact are detailed within Oil Pollution Emergency Plans and Emergency Response Plans, listed in Section 8.2.

PUK-SMS-COM-005 Offshore Environmental Permits Compliance and PUK-SMS-COM-011 Onshore Environmental Permit Compliance detail permit non-compliance and internal and external reporting requirements, which are also covered in PUK-SMS-MOI-001 Incident Reporting and Investigation.

PUK-SMS-MOI-001 Incident Reporting and Investigation details the process for investigating non-conformities, identifying causes, and implementing corrective actions. Incident investigation and actions are tracked in the Management of Incidents (MOI) tracking system.

PUK-SMS-MOI-001 describes the process of reviewing the effectiveness of actions raised to prevent re-occurrence for high severity incidents. This aligns to the 6.1.4 Planning action.

9.0 Performance Review

PUK-SNS routinely monitors, measures and analyses its environmental performance, evaluates its performance and fulfilment of its compliance obligations, and conducts comprehensive internal auditing to assess whether the IMS meets the requirements of PUK-SNS and the ISO14001:2015 standard, and is implemented and maintained effectively. The Monthly Operations QSHE Leadership Meeting is one of the forums with a review of QSSHE performance, compliance and management.

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

Many key monitoring and measurement activities relate to specific requirements of regulatory Permits and Consents. These requirements are detailed within the following SEMS procedures:

- PUK-SMS-COM-005 Offshore Environmental Permit Compliance;
- PUK-SMS-COM-007 PPC and EU Emission Trading Scheme Compliance Management;
- PUK-SMS-COM-009 Oil Discharge Permit Application and Compliance.
- PUK-SMS-COM-010 Compliance with Offshore Chemicals Regulations Permits (Chemicals Use and Discharge);
- PUK-SMS-COM-011 Onshore Environmental Permit Compliance (terminals);
- PUK-SMS-COM-012 Waste Management; and
- PUK-SMS-COM-013 Radioactive Substances.
- PUK-SMS-COM-039 Major Accident Hazard Strategy
- PUK-SMS-TI-040 Corrosion Management Strategy for SNS Pipelines
- PUK-SMS-TI-022 Potential Dropped Object Management (PDO)
- PUK-SMS-TI-019 Inspection Body Onshore Facilities Quality Management System
- PUK-SMS-TI-027 Solids Management Strategy
- PUK-SMS-RM-015 Alarm Management
- PUK-SMS-MOC-001 Management of Change Procedure
- PUK-SMS-AS-001 PUK-SNS Assurance Programme
- PUK-SMS-COM-033 Action Management Procedure
- PUK-SMS-COM-003 Environmental Management Procedure

The QSSHE Manager in consultation with:

- The Environment Team is responsible for establishing Environment Performance Indicators where appropriate. These may be Key Performance Indicators (KPIs) e.g. spills to sea, regulatory reports (PON 1, PON 2, PON 10, schedule 5) and greenhouse gas emissions.
- The Major Accident Hazard (MAH) board is chaired by the General Manager and attended by Operations, QSHE and Technical Leadership. The MAH Board reviews all MAH risks on a six-monthly frequency through the relevant key performance

indicators (KPI's) and significant findings from the HSE Assurance Programme that relate to MAH. Key MAH risks are communicated to the Perenco Group CEO as part of the annual TCM.

- The Assurance Manager is responsible for the development and implementation of the PUK-SNS Assurance program across the business providing support, coaching and advise to sites. As well as establishing and maintaining relevant auditing tools to collect, analysis and review performance (leading and Lagging) metrics from internal and external data (regulatory / Industry) to ensure the assurance programme is relevant and fit for purpose.
- The Operational Safety Lead is responsible for establishing indicators for the monitoring of the business's safety performance, including injury trends, management of POST Cards, incident investigations and the timely closure of associated actions.
- The Occupational Hygiene Lead is responsible for establishing monitoring and evaluation of Occupational Health medical data trends and Occupational Hygiene exposure data to hazardous agents.

A review of Health, Safety and Environmental performance, progress against objectives and established KPIs, and any compliance issues identified, are reviewed at the Monthly Operations QSHE Leadership Meeting.

9.1.2 Evaluation of Compliance

The process for evaluating compliance against Occupational Health and Safety, and Environmental legal requirements is achieved through regular review of the legal register (held on Simplifi).

PUK-SMS-COM-005 and PUK-SMS-COM-011 Offshore and Onshore Environmental Permit Compliance respectively details the requirements for the evaluation and reporting of environmental compliance, incorporating issues identified by audit, as well as non-compliance records.

9.2 Internal Audit

9.2.1 General

PUK-SNS has a system of internal auditing, described in PUK-SMS-AS-001 PUK Assurance Programme.

9.2.2 Internal Audit Programme

The Assurance Programme describes the framework for planning, implementing and evaluating the internal audit, monitoring and review process. Including those required to undertake assurance activities (roles and responsibilities) and identified training requirements. The assurance framework is focused on delivering a systematic and proportionate risk-based programme, to assess compliance against SEMS elements associated to Occupational Health, Safety and Environmental processes, legal compliance and risk control measures, associated to major accidents.

A four-level tiered system is used to provide perspective from Norwich HQ (Level 1 & 2) and self-verification of operational delivery at site level (3 & 4) so that sites can directly learn from the findings.

The outputs of assurance findings are risk ranked and recorded within the action tracking system (P-Trac) and are reviewed periodically to analyse non-compliance against SEMS, weak signals associated to MAH and opportunities to improve the management system and close-out tracked to completion in compliance with Action Tracking Procedure (PUK-SMS-COM-033).

Assurance activity findings are reviewed periodically communicated through the following;

- Monthly Assurance Report – High level overview of all assurance outputs, shared with Senior Leadership, Senior Management and Site Management.
- Quarterly Assurance Review Meeting – Presentation provided to Senior Leadership and Senior Management Team to evaluate performance, actions and opportunities to improve.
- Six-monthly Major Accident Hazard (MAH) Board meeting to review significant risks from assurance outputs that require major change to QSHE and operational processes.

The assurance program itself is reviewed annually by the Assurance Advisory Committee representative of Site and HQ management, Technical Authorities, Department Heads and Elected Safety Representatives to ascertain that it is;

- (i) fit for purpose in terms of delivery of the programme and assurance levels (1-4)
- (ii) driven by a suitable ranking of risk
- (iii) The review will also include HSE performance, compliance and management using indicators such as internal assurance outputs, IVB actions, HSE/OPRED Inspections etc. to determine future assurance requirements. The assurance plan delivery (audits complete against the original plan), that findings are shared and actions completed on time and in a sustainable manner.

9.3 Management Review

The PUK Management Team is responsible for the regular review of HSE performance, compliance and management, including the ongoing suitability, adequacy and effectiveness of the IMS. In addition to the health safety and environmental performance reviews conducted at the Monthly Operations QSSHE Leadership Meeting (Section 9.1.1), a broader Integrated Management Review is held annually (unless there is significant business change).

The Occupational Health, Operational Safety and Environmental Teams are responsible for the preparation of an agenda in accordance with Section 9.3 of the Standard, provision of relevant information for review, and to ensure that minutes are kept and retained.

The Integrated Management Review will generally cover:

Item
Progress on outstanding actions from previous meetings
Review and highlight any changes in; • External and internal issues that are relevant to the IMS • The needs and expectations of interested parties, including compliance obligations (e.g. partners, NSTA/ Department for Energy Security and Net Zero/ consultees on Decommissioning/HSEEx) • Significant aspects; Risk and opportunities
The extent to which IMS objectives have been achieved and a review of their effectiveness.
Review of PESTLE and SWOT
Information on the health safety and environmental performance, including trends in; 1. Competency 2. Incidents, nonconformities, corrective actions, and continual improvements 3. Monitoring and measurement results (including HSEEx/OPRED actions close out and effectiveness review) 4. Fulfilment of compliance obligations 5. Audit results (internal)
Relevant communications from interested parties; including complaints (e.g. Bacton & Dimlington; Waste non-compliances)
Approval of new objectives
Adequacy of resources
Opportunities for continual improvement

The QSSHE team are responsible for producing the Minutes documenting the output of the review, which shall include:

- Conclusions on the continuing suitability, adequacy and effectiveness of the IMS;
- Subsequent decisions related to identified opportunities for continual improvement; and
- Any need for changes to the IMS, including the environmental policy and objectives.

An elected safety rep shall be present at the meeting to ensure that the consultation and participation of workers is captured.

Actions arising from the review shall be recorded in P-Trac and tracked to completion.

10.0 Improvement

10.1 General

PUK-SNS establishes and implements appropriate actions to realise agreed opportunities for improvement arising from the performance evaluation (Section 9.1), internal audit (Section 9.2) and management review (Section 9.3) processes, through the setting of objectives as described in Section 6.2.

10.2 Incident, Nonconformity and Corrective Action

Management of Incidents

The management of incidents is described with PUK-SMS-MOI-001.

All incidents are captured within the Management of incident system (MOI) on the Perenco intranet.

Incidents within PUK-SNS which meet the minimum criteria of PUK-SMS-MOI-001 are investigated and simple causation completed to determine root cause and define SMART actions with the aim to, recover, reduce likelihood or severity, and prevent re-occurrence.

Investigations of Severity 3, 4 and 5 require a Safety Rep to participate in the associated investigations.

Action Tracking

P-TRAC (Perenco Action Tracking) is PUK-SNS's Action tracking tool. The process of tracking actions is described within PUK-SNS-COM-033.

Actions can also be generated in MOI, however these are typically shorter term actions. Any actions which have been open or will take longer than three months should be entered into P-trac. Action tracking in MOI is also covered within PUK-SNS-COM-033.

Non-Conformance Report (NCR) Process

The NCR process is defined within PUK-SNS-QA-004 and is utilised to ensure that non-conformances are identified and corrective actions are undertaken, communicated and escalated where necessary by PUK personnel. The aim of the procedure is to avoid the recurrence of non-conformances through the application of continual improvement principles.

Each NCR will be entered into P-TRAC and tracked to completion.

CAPA Log

Specific nonconformities raised against the ISO:14001 2015 and ISO:45001 2018 standards are documented in the respective Corrective Action and Preventive Action (CAPA) Log. The CAPA includes the nonconformity identified and the action required. All nonconformances require investigation of the root cause and a date for the corrective action to be completed.

Each nonconformity and corrective action will be entered into P-Trac and tracked to completion.

Effectiveness Review

The effectiveness of actions raised are reviewed by the following methods:

- The evaluation of effectiveness of actioned raised to prevent the re-occurrence of High potential incidents are described within PUK-SMS-MOI-001
- PUK-SNS-AS-001 process provides review of the effectiveness of corrective action taken, through targeted asset assurance planning. Asset assurance monitoring plans, which are periodically tailored to align to influencing factors, such as incident trends, significant procedural modifications, regulatory intervention.
- Monthly Key Performance Indicators
- Weekly and Monthly QSHE performance reviews
- Annual Management Systems Objective Review.
- Periodic action reviews by a joint QSHE and Operations team.

To ensure the effectiveness of the action take to close the action within P-TRAC, the systems is configured to ensure a gated review process for Regulatory, HAZOP, LOPA and MOI actions. This ensures that a review of the action taken to meet the requirement of the action raised is consistent. This process is described within PUK-SMS-COM-033.

10.3 Continual Improvement

As detailed within the Perenco Health Safety and Environmental Policies, PUK-SNS is committed to continual improvement of the IMS to enhance its performance. This principle is an integral component of the IMS, from the Policy through the setting of objectives via the QSSHE Plans, to investigation and corrective action response to incidents.

Continual improvements plans are established and maintained for each Normally Attended sites and onshore Terminals. These improvement plans are developed by reviewing key components of the management system at the site level and physical improvements to advance health safety and environmental performance.

Other useful sources of information for continual improvement include:

- Experience gained from nonconformities and related corrective actions.
- External benchmarking against best practices.
- OEUK / IOGP
- Step Change in Safety (SCiS)
- New or proposed legislation.
- Audits and reviews.
- Evaluation and analysis of monitoring and measurement results.
- Literature on advancement in technology.
- Views of interested parties, including employees, customers and suppliers.

When opportunities for improvements are identified, they will be evaluated to determine what actions should be taken. The steps determined to meet the opportunity will be established.

The workforce is encourage to participate in the continual improvement by the use of the Perenco safety observation technic system (POST). Promoting the reporting of health safety and environmental observations, unsafe acts, unsafe conditions. Positive behaviours and improvement ideas. Continuous improvement is also championed by the Elected Safety Representatives as described within PUK-SMS-PTC-002/

Any opportunities for improvement requiring action will be entered into P-Trac and tracked to completion.

11.0 Assurance & Review

11.1 PUK Assurance Frame Work

Assurance activities are defined within the PUK-SNS Assurance Framework (PUK-SMS-AS-001) which captures all Audit, Monitoring & Review processes.

Assurance activities are planned, performed, recorded and actioned through a risk-based approach (unless stated otherwise within this procedure) considering the importance of the task / process / activity and influenced by other factors such as industry guidance, previous incidents and audit findings.

All assurance activities and associated actions to be logged in the PUK action tracking system (P-Trac).

11.2 Document Review

The **5-yearly** periodic review of this document will ensure that it is still effective and fit for purpose. The document owner should look at:

- Whether it sets out clear objectives and method on the subject matter.
- How associated procedures related to the document are effective and complement one another.
- Seek independent technical guidance / industry standards on the subject matter to ensure the document remains fit for purpose.
- Consider how changes to the document will be communicated effectively to the workforce and ensure that those who use it are informed and fully conversant with the changes.

Note: Changes to legislation and/or industry standards which affect this document fall outside the periodic review and require immediate update by the document owner.

Appendix A Perenco UK Letter of Engagement



Adobe Acrobat
PDFXML Document



PERENCO

30 May 2025

Subject: Letter of intent

As the General Manager of Perenco SNS, I reaffirm our commitment to implementing a health, safety, and environmental protection policy that aligns with the strategic direction of the Perenco Group.

Perenco SNS, as a responsible and prudent operator, is committed to continually strengthen its culture of risk prevention. This includes promoting the health and safety of our staff and protecting the environment and biodiversity of the areas in which we operate.

The technical and operational support that Perenco SNS HQ offers to other Perenco SNS Assets provides a valuable resource. It enables us to document and assess the potential impacts of our activities on the health and safety of our workforce and their working environment. These risk analysis processes underpin a process of continuous improvement, helping to enshrine best practices in health, safety and environmental management across all relevant activities involving Perenco staff in the SNS.

By upholding these principles of continual improvement and encouraging the active involvement of all staff, we aim to directly meet the standards of ISO 14001:2015 and ISO 45001:2018.

Perenco SNS has discussed and agreed on local objectives, which we are committed to delivering. These are defined within PUK-SMS-COM-003-03 - PUK SNS Objectives and Targets. Our objectives are aligned with the Group's strategic vision, as reflected in the CORP-HSE-REG-001 Corporate Objectives OHS.

We will achieve these goals through the effective deployment and continuous improvement of the company's Integrated Management System (Health, Safety at Work & Environment).

Our intent as an organisation is to secure certification in accordance with our corporate health safety and environmental policies. Ultimately, our priority is to ensure the health and safety of our staff and to ensure the environment around us is protected from harm.

Yours sincerely

For and on behalf of
Perenco UK Limited

Jonathan White
SNS General Manager

Appendix B Abbreviations and Definitions

1 Abbreviations

Abbreviation	Description
ALARP	As Low As Reasonably Practicable
AVL	Approved Vendor List
BAT	Best Available Techniques
BEIS	Department for Business, Energy, and Industrial Strategy
Boepd	Barrels of oil equivalent per day
CAPA	Corrective Action and Preventive Action
CBT	Computer Based Training
CEFAS	Centre for Environment, Fisheries and Aquaculture
COMAH	Control of Major Accident Hazards
COMOPS	Combined Operations Process
CoP	Cessation of Production
EA	Environment Agency
EEMS	Environmental Emissions Monitoring System
EoL	End of Life
EPR	Environmental Permitting Regulations
ERRV	Emergency Response and Recovery Vessels
ES	Environmental Statement
GHG	Green House Gas
HAZID/ENVID	Hazard and Environmental Identification Study
HAZOP	Hazard and Operability Study
HR	Human Resources
IMS	Integrated Management System
IMT	Incident Management Team
JNCC	Joint Nature Conservation Committee
MAH	Major Accident Hazard
MOI	Management of Incidents
NGOs	Non-Governmental Organisations
NMA	Normally Attended Installation
NTS	National Transmission System
NTSA	North Sea Transition Authority
NUI	Normally Unattended Installation
OEUK	Offshore Energies UK
OIM	Offshore Installation Manager

Abbreviation	Description
OPEPs	Oil Pollution Emergency Plans
OSPAR	Oslo and Paris (conventions)
PCAP	Perenco Competency Assurance Process
PeMOC	Perenco electronic Management of Change
PESTLE	Political, Economic, Social, Technology and Environmental
PPC	(Integrated) Pollution Prevention and Control
PUK	Perenco UK
PUK-SNS	Perenco UK Southern North Sea
QSSHE	Quality Security Safety Health Environment
SECR	Streamline Energy & Carbon Reporting
SEMS	Safety and Environmental Management System
SNS	Southern North Sea
SMART	Specific, Measurable, Achievable, Resourced and Time-bound
SWOT	Strengths, Weaknesses, Opportunities and Risk
TRM	Total Risk Management

Appendix C References and Links

1 References

114-00004-005 Dimlington Terminals Emergency Response Plan

PUK-BAC-ERP-001 Bacton Terminal Emergency Response Plan

PUK-SMS-AS-001 Assurance Programme

PUK-SMS-ER-003 SNS Incident Management Plan

PUK-SMS-COM-004 Environmental Risk

PUK-SMS-COM-005 Offshore Environmental Permit Compliance

PUK-SMS-COM-006 Operational Environmental Standards

PUK-SMS-COM-007 PPC and EU Emission Trading Scheme Compliance Management

PUK-SMS-COM-009 Oil Discharge Permit Application and Compliance.

PUK-SMS-COM-010 Compliance with Offshore Chemicals Regulations Permits (Chemicals Use and Discharge)

PUK-SMS-COM-011 Onshore Environmental Permit Compliance (terminals)

PUK-SMS-COM-012 Waste Management

PUK-SMS-COM-013 Radioactive Substances.

PUK-SNS-COM-019 Environmental Policy

PUK-SMS-COM-026 Health, Safety, and Environmental Stakeholder Management

PUK-SMS-COM-028 Compliance with Fluorinated Greenhouse Gases (HFCs) Regulations (F-GAS)

PUK-SMS-COM-037 Management of Regulatory Interventions & Commitments

PUK-SMS-COM-046 PUK-SNS Contractor Management Procedure

PUK-SMS-DCC-004 PUK Document Retention and Disposal Policy

PUK-SMS-DCC-006 PUK Document Control and Records Management Policy

PUK-SMS-MOC-001 Management of Change

PUK-SMS-MOI-001 Incident Reporting and Investigation

PUK-SMS-PRJ-001 Project Management Procedure

PUK-SMS-PRJ-002 Decommissioning Strategy

PUK-SMS-PRJ-006 End of Life (EoL) Offshore Decommissioning document

PUK-SMS-PTC-001 Employee Induction Procedure

PUK-SMS-PTC-003 OIM Competence and Appointment

PUK-SMS-PTC-004 Policy for the Management of Safety and Environmentally Critical Competencies

PUK-SMS-PTC-005 Incident Management Team Compete

PUK-SMS-RM-001 Guidance on HAZOP
PUK-SMS-RM-002 Layers of Protection Analysis
PUK-SMS-RM-003 Total Risk Management Review
PUK-SMS-RM-004 Inherently Safer Design
PUK-SMS-RM-005 HAZID/ENVID Procedure
SNS-1011193 Bacton Induction Process?
UKCS-EM-015 Onshore Oil Pollution Emergency Plan
XXX-MA-L-10000 Bacton Pipelines Emergency Procedures
PUK-SMS-COM-003-01 IMS PESTLE
PUK-SMS-COM-003-02 IMS SWOT
PUK-SMS-COM-003-03 IMS Objectives and Targets
CORP-HSE-REG-001-2 Corporate Objectives OHS - ENV

2 Links

BSI Environmental Management Systems – Requirements with guidance for use

[BSENISO14001-2015.pdf](#)

Appendix D QSHE Interface RACI

		Teams								
Activity		PUK QSHE	PUK Operations	PUK Projects	PUK Wells	PUK Drilling	PUK Integrity	PUK Decom	PUK Finance	PUK Legal
NSTA	COP	I	R+A		I			I		
	S29							I		R+A
	Wells Licence	C*			R+A			C*		
	Stewardship Survey		R	R	R	R		R	R+A	
	Tier 2 Meetings - Stewardship Review (dependent on subject)	C*	R+A	C*	C*	C*	C*	C*		
	WONS	C			R+A			C		
	Vent Consent	R	A							
	PWA Variation - Operation		R+A				C			
	PWA Variation - Decom							R+A		
	Deposit Consent (DEPCON) - Operation		R+A				C			
	Deposit Consent (DEPCON) - Decom							R+A		
	Supply Chain Action Plans (SCAP) - Projects			C						R
	Supply Chain Action Plans (SCAP) - Decom							R+A		
	Production Consent	I	A		R					
	IPR						R+A	I		
WIOS - Operatorship transferred to PDEC							R+A			

EA	IWS Permit							R+A		
	IWS Financial Guarantee							A	R	
HSE	PSR Notification - Operation						R+A			
	PSR Notification - Decom						C	R+A		
	Schedule 9 - Wells	C			R+A					
	Schedule 9 - Decom				C			R+A		
	NORM Permit Variations - Operations	R	A							
	NORM Permit Variations - Decom							R+A		
	Sealed Source Radiation Permit Variation - Operations	R	A							
	Sealed Source Radiation Permit Variation - Decom							R+A		
	Safety Zone Order - Establish for subsea structure			R+A						
	Surface Installation Safety Zone - Manage		R+A							
	Safety Zone Order - Revoke						C	R+A		
	Safety Zone Order - Extend protection to cover phased decommissioning							R+A		
	Material Change to PUK Ops Safety Case (SC)	R	A							
	Dismantlement SC (HCF, LH, SKIDDING, JACKET)	R						A		
	Combined Operations (COMOPs)	R+A	C	C	C	C	C	C		
	HSE Audit	R+A	C	C	C	C	C	C		

OPRED Survey Permit - Production	Installation Survey Licence	R+A	C							
	Installation Survey Notification	R+A	C							
	PL Survey Licence	R+A	C				C			
	PL Survey Notification	R+A	C				C			
	PL Crown Estate Licence	R+A	C				C			
OPRED Survey Permit - Decommissioning	Installation Survey Licence							R+A		
	Installation Survey Notification							R+A		
	PL Survey Licence						C	R+A		
	PL Survey Notification						C	R+A		
	PL Crown Estate Licence						C	R+A		
OPRED Reporting	OPRED Audit	R+A	C	C	C	C	C	C		
	EEMS Reporting	R+A	C	C	C	C	C	R		
	Non-Compliance (PON1, PON2, PON10) (OIM responsible for submission)	R	R+A*	R	R	R	R	R		
OPRED Decommissioning	Decommissioning Program (DP)		C		C		C	R+A		
	Environmental Appraisal (EA)	C						R+A		
	Comparative Assessment							R+A		
	Installation Progress Report and Close Out Report							R+A		
	OPRED Qtly Meetings							R+A		
	OPRED Qtly Reports							R+A		

OPRED Wells / Installation Permits (HCS)	WIA MAT EIA (activity dependent)	R*			A			R*		
	P&A Marine Licence	R			A			R		
	P&A OPPC	R			A			R		
	P&A Chemical Permit	R			A			R		
OPRED Other - Production	PROD MAT EIA	R	A*	A*	A*	A*				
	Consent to Locate	R	A							
	SSA	I	R+A							
	CRA	R	A*	A*						
	VTS / NRA	R		A						
	OPEPS, TOOPEP, CIPs	R+A								
	Wild Birds Disturbance Licence	R	A					R		
OPRED Other - Decommissioning	Consent to Locate							R+A		
	SSA							R+A		
	CRA							R+A		
	VTS / NRA							R+A		
	Wild Birds Disturbance Licence							R+A		
	Updating / revoking OPEPS, TOOPEP, CIPs post-COP							R+A		
	Active Waste Management Plan							R+A		

Monitoring and Reporting	Collection and reporting of GHG emission data	R+A	R	R	R	R		R		
	Bird Management Portal	R+A	R					R		
	Annual OSPAR substitution report	R+A						C		
Other - Internal	F-Gas management - pre-COP	C	R+A							
	F-Gas management - post-COP	C						R+A		
	PUK-SNS Environmental Risk Register	R+A	R	R	R	R	R	R		
	Responsibilities for updating and maintaining the Simplifi Aspects and Legal Register	R+A	R	R	R	R	R	R		
	PUK Internal Environmental Reporting	R+A	C	C	C	C	C	C		
	Incident Investigation (activity dependent)	R*	R+A*	R*	R*	R*	C*	R*		
	Permit Condition Tracking - EmTRAX	R+A	C*	C*	C*	C*	C*	C*		
Other External	AIS licence (OfCom) (activity dependent)		R+A*	R+A*				R+A*		
	Notification of Decom							R+A		
	Kingfisher Notification (activity dependent)	R+A*	R*	R*				R+A*		
	UKHO Notification (activity dependent)	R+A*	R*	R*				R+A*		
	Helideck Cess. Of Use (MCA)		R+A					I		
	Crown Estate Notification (activity dependent)			R+A*				R+A*		

Uncontrolled When Printed