

Environmental Management System (EMS) Summary – Form C2 (3d)

EPR/PP3439GG – Fine Organics Limited

Permit Variation Application V008

1. Introduction and Purpose

Lianhetech Seal Sands (LSS), a trading name of Fine Organics Limited, operates a certified Environmental Management System (EMS) aligned with ISO 14001. The EMS ensures that all permitted activities are managed to minimise environmental impact, prevent pollution and comply with Environmental Permitting Regulations. The EMS is a structured framework of policies, procedures and controls that defines how environmental risks are identified, managed, monitored and reviewed across all site operations.

2. Scope of the EMS

The EMS applies to all activities, products and services undertaken at the Seal Sands site, including:

- Manufacture of fine chemicals
- Storage and handling of raw materials and waste
- Utilities and energy use
- Emissions to air, water and land

A life cycle perspective is applied, considering impacts from raw material sourcing through production, distribution and end-of-life where influence is possible.

3. Environmental Policy and Commitments

LSS maintains an Environmental Policy Framework consisting of:

- Environmental Management & Sustainability Policy
- Emissions to Air Policy
- Climate Change Policy
- Energy Management Policy
- Water Management Policy
- Waste Management Policy
- Land & Biodiversity Policy

These policies commit the organisation to:

- Compliance with legal and permit requirements
- Pollution prevention and environmental protection
- Sustainable resource use
- Climate change mitigation and adaptation
- Continual improvement in environmental performance

Policies are communicated to staff and made available to stakeholders.

4. Management Structure and Responsibilities

Environmental management is led by the Senior Leadership Team (SLT), who:

- Ensure EMS effectiveness and resource provision
- Approve environmental policy and objectives
- Lead management review

The Safety, Health and Environment (SHE) department:

- Maintains the EMS
- Oversees compliance and auditing
- Develops environmental objectives

Departmental managers and employees are responsible for implementing controls within their areas.

5. Risk Assessment, Environmental Aspects and Compliance

LSS operates a structured process to:

- Identify environmental aspects and impacts
- Assess significance using defined criteria
- Maintain an environmental aspects risk register
- Identify risks under normal, abnormal and emergency conditions (risks include emissions, waste handling, loss of containment and climate-related impacts).

The organisation maintains a legal register to identify and comply with:

- Environmental permits (e.g. EPR/PP3439GG)
- National and international legislation
- Regulatory, stakeholder and other requirements

6. Operational Control and Procedures

Operational controls are implemented to manage environmental risks, including:

- Emissions control systems and monitoring points
- Waste segregation, storage and disposal procedures
- Water and drainage management controls
- Energy efficiency and resource use processes
- Contractor and process change management

All operations are supported by documented procedures within the Business Management System.

7. Site Infrastructure and Maintenance

The site includes multiple production workshops with defined emission points and supporting utilities.

Environmental protection is ensured through:

- Engineered containment systems (bunds, drainage, impermeable surfaces)
- Preventative maintenance programmes
- Inspection of pipelines, drainage and storage systems
- Site drainage plans and infrastructure controls

8. Accident Prevention and Emergency Planning

LSS is an upper-tier COMAH site and maintains robust emergency arrangements, including:

- On-site and off-site emergency plans
- Spill control and containment procedures
- Incident response and escalation processes

Potential accident scenarios (e.g. fire, loss of containment) are considered within risk assessments, with controls in place to minimise environmental impact.

9. Monitoring, Measurement and Record Keeping

Environmental performance is monitored through:

- Permit-required emissions monitoring
- KPIs and performance indicators
- Routine inspections and audits
- Environmental reporting systems

Compliance is evaluated via:

- Internal audits
- Management review
- Regulatory reporting

Records are maintained and controlled in accordance with document management procedures.

10. Training, Competence and Awareness

LSS ensures all personnel are competent through:

- Role-based training programmes
- Key Skills and Training Matrix
- Environmental awareness communication

Employees are required to understand environmental risks and operate in accordance with permit and EMS requirements.

11. Communication and Complaints

The EMS includes processes for:

- Internal communication via intranet, meetings, and reports
- External communication with regulators and stakeholders
- Providing policy and environmental information where required

Complaints and external feedback are managed, investigated and used to drive improvements.

12. Review and Continuous Improvement

The EMS is subject to continual improvement through:

- Internal and external audits
- Incident investigation and root cause analysis
- Corrective and preventive actions (CAPA system)
- Annual management review (evaluates performance, compliance, risks and opportunities, and sets environmental objectives).

13. Site Closure and Environmental Protection

The EMS includes controls to:

- Prevent land and groundwater contamination
- Maintain a Site Protection and Monitoring Plan (SPMP)
- Manage end-of-life conditions and restoration

Land and groundwater protection measures are embedded within operational controls and monitoring programmes.

14. Certification

The EMS is certified to ISO 14001 and aligned with Environmental Permitting Regulations 2016.

Certification documentation is provided as part of the permit application,

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