

EDGE CLOSE GREEN ENERGY LIMITED

Environmental Management System Manual

ANIMAL BY-PRODUCT PROCESSING AND OIL EXTRACTION

Main Road, Flagg, nr Buxton

Issue 1

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	1 of 19

EM1 - Environmental Manual

Environmental Manual

Contents:

1.0	Introduction
1.1	Scope
2.0	References
3.0	Definitions
3.1	Abbreviations
4.0	Environmental Management System Requirements
4.1	General requirements
4.2	Environmental policy
4.3	Planning
4.3.1	Environmental aspects
4.3.2	Legal and other requirements
4.3.3	Objectives and targets
4.4	Implementation and operations
4.4.1	Structure and responsibility
4.4.2	Training, awareness and competence
4.4.3	Communication
4.4.4	Environmental Management System documentation
4.4.5	Document control
4.4.6	Operational control
4.4.7	Emergency preparedness and response
4.5	Checking and corrective action
4.5.1	Monitoring & measurement
4.5.2	Non-conformance and corrective and preventive action
4.5.3	Records
4.5.4	Environmental Management System audit
4.6	Management review

Appendices

1	Environmental Policy
2	Environmental Management Structure
3	Environmental Procedures
4	Amendment status record sheet
5	Amendment Details

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	2 of 19

EM1 - Environmental Manual

1.0 Introduction

Edge Close Green Energy Ltd has been established to operate an animal carcass and by-products processing and oil extraction plant, with associated electricity generation on a site adjoining the premises of F Redfern and Sons Limited who operate an established knackery, animal carcass incinerator and pet crematorium at their premises at Main Road, Flagg, nr Buxton. The Company will receive carcasses and by-products from the adjoining knackery and Intermediate Plant. Extracted oil will be used to generate electricity on site, for use by the Installation, the adjoining knackery and for export to the Grid. Meat and bone meal will be taken off-site for use in energy generation.

This environment manual relates to prescribed activities carried out at the animal carcass processing and oil extraction Installation of Edge Close Green Energy Ltd that can have an impact on the environment and has been written to conform to the requirements of Operator Performance within the scope of IPPC-OPRA.

1.1 Scope

This Environmental Management System is intended to cover the animal carcass processing and oil extraction activities that can impact on the environment of the Installation of Edge Close Green Energy Ltd at their site at Main Road, Flagg.

2.0 References

The Environmental Permitting (England and Wales) Regulations, 2016.

3.0 Definitions

Continual improvement - process of enhancing the Environmental Management System to achieve improvement in overall environmental performance in line with the organisation's environmental policy.

Environment - surroundings in which an organisation operates including air, water, land, natural resources, flora, fauna, humans, and their interrelations.

Environmental aspect - an element of an organisation's activities, products or services that can interact with the environment with positive or negative effect.

Environmental impact - any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services.

Environmental Management System - the part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	3 of 19

EM1 - Environmental Manual

and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental Management System audit - a systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's Environmental Management System conforms to the audit criteria set by the organisation, and for communication of the results of this process to management.

Environmental policy - statement by the organisation of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.

Environmental objective - overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.

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

Environmental performance - measurable results of the Environmental Management System, related to an organisation's control of its environmental aspects, based on its environmental policy, objectives and targets.

Organisation - company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Prevention of pollution - uses of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.

3.1 Abbreviations

EMR	Environmental Management Representative
OHS	Occupational Health & Safety
EMS	Environmental Management System
LA	Local Authority
EA	Environment Agency
EPR	The Environmental Permitting Regulations
COSHH	Control of Substances Hazardous to Health
EFSIS	European Food Safety Inspection System
HACCP	Hazard Analysis Critical Control Point
EA-OPRA	Environment Agency – Operator Performance Risk Assessment
IPPC	Integrated Pollution Prevention and Control

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	4 of 19

EM1 - Environmental Manual

4.0 Environmental Management System requirements

4.1 General requirements

This EMS has been drawn up to control the environmental impact of the facility and its operation; this EMS also satisfies the requirements of operator performance within IPPC.

4.2 Environmental policy

The Senior Management has defined the organisation's environmental policy.

This policy shall be reviewed by senior management on at least an annual basis at an environmental management review meeting. The Policy shall take account of information gathered in procedure EM2.

The Environmental Policy Statement can be found in Appendix EM1-1.

4.3 Planning

4.3.1 Environmental aspects – Risk Assessment

The Company has established a procedure for reviewing environmental aspects and subsequent risk assessment. All known environmental aspects were listed as part of an initial environmental review.

Aspects were reviewed by the EMR under the following headings, under normal, abnormal and emergency operating conditions:

- Point / fugitive emissions to atmosphere
- Point / fugitive emissions to water
- Point / fugitive emissions to land
- Raw materials and natural resources
- Waste management
- Noise
- Odour
- Other environmental and community issues

This information was then used to carry out an initial risk assessment using a simple model. The management then used the assessment to select a short list of environmental aspects having most impact and significant effect on the environment. This list was used to set environmental objectives and targets.

Environmental Aspects are listed in the appendix to EM1-2 – Environmental aspects

Reference

EM2 – Environmental Aspects

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	5 of 19

EM1 - Environmental Manual

4.3.2 Legal and other requirements

The identified Acts of Parliament and EU Regulations applicable to the site are currently:

- The Health & Safety at Work Act 1974, as amended
- The Environment Act 1995
- The Environmental Protection Act 1990
- Pollution Prevention and Control Act 1999
- Prevention of Oil Pollution Act 1971
- Noise and Statutory Nuisance Act 1993
- The Clean Air Act 1993
- The Water Resources Act 1991
- The Town and Country Planning Act 1990, as amended
- EU 1069/2009 Animal By-Products Regulations
- The Waste Management Licensing Regulations 1994
- The Environmental Permitting Regulations (England and Wales) 2016

4.3.3 Objectives and targets

The Management uses a teamwork approach for setting objectives and targets aimed at the prevention or reduction of pollution; these objectives are then put before the senior management for approval.

The Company sets its objectives consistent with its environmental policy. Objectives are set to reduce the impact of the identified significant environmental effects, concentrating on:

- Reducing fugitive risks to land and surface water – the prevention of spillages and leakages
- Reducing emissions to air (odour)
- Security
- Managing emergency situations

Reference

EM2 Environmental aspects and objectives

4.4 Implementation and operation

4.4.1 Structure and responsibility

The Senior Management has delegated the responsibility for implementing an ongoing EMS to the EMR.

The responsibilities of the EMR have been written down along with those of other key members of management.

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	6 of 19

EM1 - Environmental Manual

Management shall provide human resources and specialised skills, technology, and financial resources essential to the implementation and maintenance of the EMS

The full structure for environmental management on the site is shown in Appendix EM1-2

4.4.2 Training, awareness and competence

The manager of the facility shall be experienced in the handling and treatment of animal carcasses and fully aware of the legislative requirements for the handling of Category 1 animal by-products; there is no recognised training qualification for this activity.

The Company shall provide induction training to new starters to inform them about the environmental management policy, objectives and programmes, and training to the level appropriate to the work to be undertaken.

Awareness training shall be provided by the personnel and EMR to existing employees and explanatory booklets shall be provided detailing the company environmental policy and outlining the elements of their job which could have an impact on the environment.

Senior management shall lead by example by including environmental management as a topic at senior management meetings.

Employees shall be advised of the environmental aspects of the Company that have significant effects on the environment. They shall be asked to consider how their own work activities might be carried out so as to minimise adverse effects to the environment.

Employees shall be instructed as to what their response should be in the event of an emergency.

Managers shall identify ongoing environmental management training needs in liaison with the EMR and skills enhancement training shall be provided as required.

4.4.2.1 References

T1 Training, Awareness and Competence

4.4.3 Communication

4.4.3.1 Internal communications

The Managing Director shall communicate information to employees about the EMS. The communication shall either be in written form such as the explanatory booklets given to all employees, or verbally by EMR at minuted briefing meetings.

4.4.3.2 Sub-contractors

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	7 of 19

EM1 - Environmental Manual

The person engaging sub-contractors is responsible for informing sub-contractors about the company environmental policy and the need for sub-contractors to pay due care and attention to the environment whilst attending on site. Attention will be drawn to the need to clear up and remove waste to the relevant waste containers during and at the end of sub-contract work on site. Attention will also be raised to spillages and other procedures in place on the site.

4.4.3.3 External communications

Communications, queries and complaints with respect to the environment shall be routed to the EMR. Replies must be passed by the Managing Director prior to release.

4.4.4 Environmental management system documentation

The documented EMS consists of this 'Environmental Manual' and a separate 'Environmental Procedures'.

A full list of all procedures notes is detailed in Appendix EM1-3

4.4.5 Document control

The EMR is responsible for the controlled issue and updating of the environmental manual and the environmental procedures. Issue of manuals is controlled by issuing numbered copies of the manual to a controlled distribution list. The EMR shall update the controlled manuals whenever the contents change.

The EMR is responsible for updating the contents of manuals.

The page or document issue level is raised and the issue number is changed for each amendment. The details of the amendments are recorded on amendment record sheets at the front of the environment manual or in the appendix of procedures.

The EMR shall retrieve updated obsolete pages and insert amended pages into controlled manuals, to ensure that all manuals are up to date at all times; the EMR shall destroy controlled copy obsolete pages.

The EMR and internal auditors shall ensure that issued controlled copies of the manuals are available at locations where operations essential to the effective functioning of the environmental management system are performed e.g. administration, management, production and maintenance areas.

4.4.5.1 Uncontrolled manuals

Uncontrolled copies of the environment manual may be issued at the discretion of the Managing Director.

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	8 of 19

EM1 - Environmental Manual

These manuals shall not be amended after being issued and are outside of the environmental management document control system.

Copies of the environmental procedures manual must not be taken off site without the written permission of the Managing Director

4.4.5.2 Legal documents

Legal documents relating to the environment such as consents and permits shall be held by the Company Secretary. Copies shall be held by the EMR within the paper copy of this EMS which shall be retained on site and available at all operational times; an electronic copy may also be maintained.

4.4.5.3 Records

Records of Waste Transfer notes shall be retained and maintained in compliance with the conditions within the Permit and in accordance with the EPR or other relevant regulations.

4.4.5.4 References

MM, OC and Training procedures

4.4.6 Operational control

Site operations consist of:

- Reception and weighing of pre-bagged and boxed veterinary waste
- Transfer to aggregated bulk storage
- Off-site shipment of aggregated bulk loads
- Ancillary operations

The full list of OC procedures notes are detailed in Appendix EM1-3

4.4.7 Emergency preparedness and response

The Emergency Plan covers major emergencies including:

- Fire
- Spillages/leakages
- Flood (if shown on indicative flood areas)

The emergency plan may appoint two key controllers for major emergencies as follows:

- Incident controller
- Site controller

Their responsibilities are specified in the Emergency Plan OC10.

The policy of Edge Close Green Energy Ltd shall be to move swiftly to mitigate any adverse environmental effects arising from emergencies.

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	9 of 19

EM1 - Environmental Manual

The Company will seek to liaise with local authorities in affecting mitigating actions.

4.4.7.1 Reference

OC10 Emergency Preparedness and Response

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	10 of 19

EM1 - Environmental Manual

4.5 Checking and Corrective action

4.5.1 Monitoring and measurement

All incoming raw material shall only be accepted for direct input into the process; no storage of animal carcasses and by-products on site shall take place. Records, in accordance with the requirements of the conditions of the Permit and the EPR, and other relevant legislation from time to time, are maintained on site. The limited trade effluent from the operation of the facility flows to a sump, and thereafter to external storage tanks – there are no uncontrolled flows or disposals.

Energy and water consumption are monitored regularly as part of the environmental improvement objective.

The EMR plays an overall role in monitoring compliance with relevant environmental legislation.

The EMR shall constantly monitor environmental aspects on behalf of the Senior Management.

4.5.1.1 References

MM procedures notes are listed in Appendix EM1-3

4.5.2 Non-conformance and corrective and preventive action

The EMR is responsible for handling and investigating non-conformance related to the environmental management programme. This could be in the form of non-conformance with legal requirements, permit conditions, the results of complaints from neighbours, members of the public or employees. Non-conformance can arise from internal audits.

The EMR shall formally record non-conformance, results of investigations, and corrective and preventive actions arising from investigations.

The EMR shall use a formal Non-conformance and Corrective and Preventive Action procedure to record non-conformance and corrective and preventive actions.

The EMR shall record any changes in the documented procedures resulting from corrective and preventive action.

4.5.2.1 Reference

MM7 Non-conformance and Corrective and Preventive Action

4.5.3 Records

The function of the environmental records system is to demonstrate the effective operation of the environmental management system, and to provide an audit trail.

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	11 of 19

EM1 - Environmental Manual

Records shall be kept in retrievable hard copy paper files and/or electronic data contained in computer files as appropriate.

Record holders shall be identified against specific records in the detailed procedures.

Note: all environmental system records are copyright to the Company and may not be copied without the permission of the Managing Director.

Records shall be retained at least for the period specified in the Permit or for a period of three years or longer at the discretion of the EMR.

4.5.3.1 References

All MM procedures

4.5.4 Environmental management system audit

Trained internal auditors shall regularly audit the environmental management system in accordance with an internal audit procedure

Any non-conformance noted during audits shall be formally recorded on non-conformance report forms.

4.5.4.1 Follow up

The EMR shall review outstanding corrective actions continuously until the corrective actions are complete and signed off.

The results of investigations, corrective and preventive actions shall be reported at the next management review meeting following each internal audit of the environmental management system.

4.5.4.2 References

AR1 Environmental Management System Audit and Reporting

4.6 Management review

The EMR shall convene environmental management system review meetings at least once per annum and more frequently if deemed necessary.

The purpose of the meetings is to review policy, objectives, targets, and the whole environmental management programme.

The results of internal environmental management system audits shall be reviewed.

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	12 of 19

EM1 - Environmental Manual

All audit reports must be available to the management review meeting members before the EMS review meetings are convened.

Minutes shall be taken during the meetings and actions allocated to people attending the meeting where relevant.

Standing members of the environmental management review meeting shall include:

- Managing Director
- EMR
- Facility Manager
- Plus other members as deemed necessary by the Director chairing the meetings.

4.6.1 References

AR2 Management Review

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	13 of 19

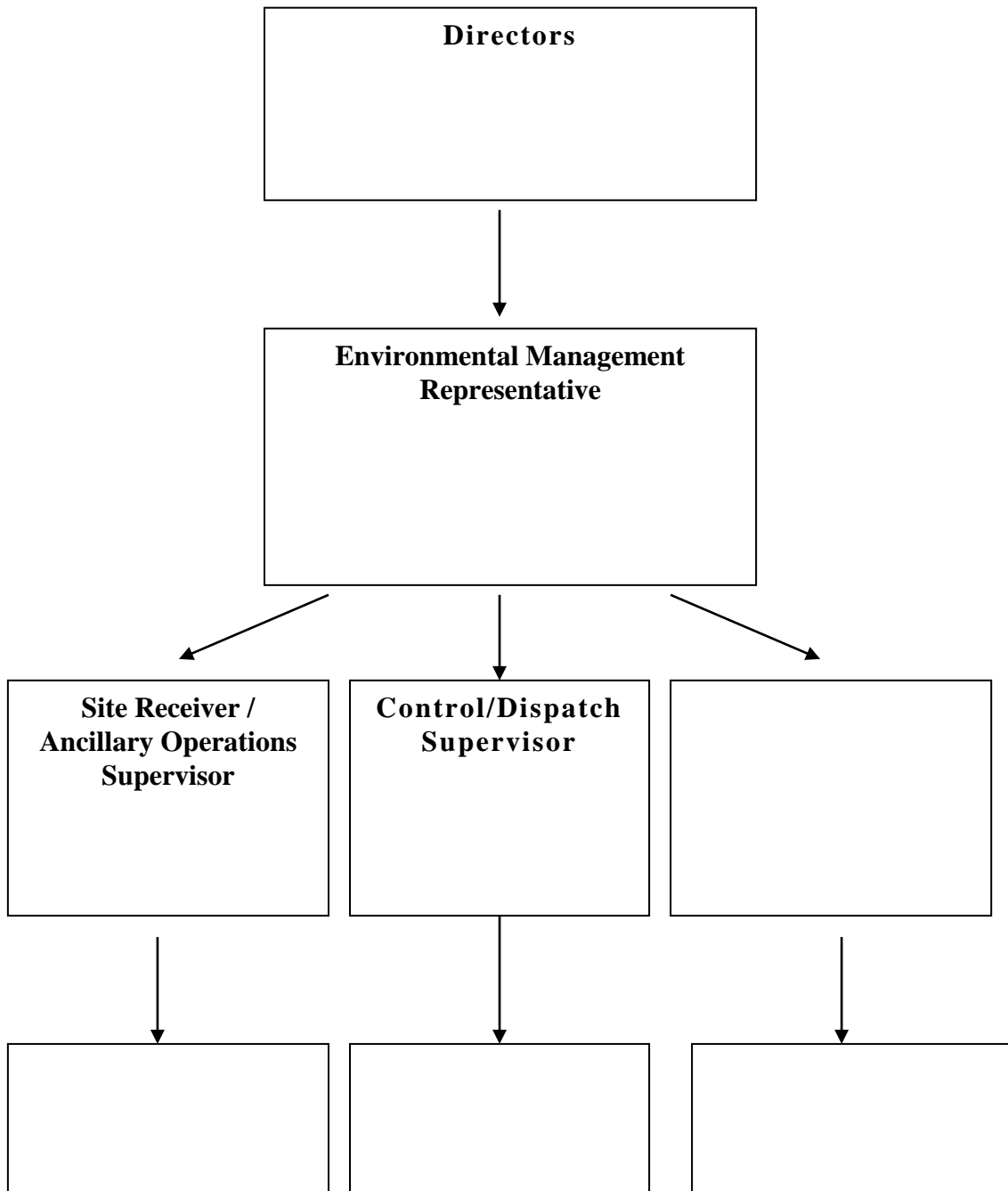
EM1 - Environmental Manual

Appendix EM1-1: Environmental Policy

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	14 of 19

EM1 - Environmental Manual

Appendix EM1-2: Management Structure



Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	15 of 19

EM1 - Environmental Manual

Appendix EM1-3: Environmental Procedures

ENVIRONMENTAL MANAGEMENT SYSTEM

EM1	Environmental Management system	i) Policy ii) Responsibility iii) Procedure iv) Monitoring v) Auditing
EM2	Environmental Aspects –Risk Assessment	i) Environmental Aspects ii) Review of Aspects iii) Risk Assessment

Operational Control

OC1	SUSPENDED	
OC2	SUSPENDED	
OC3	SUSPENDED	
OC4	SUSPENDED	
OC5	Water	i) Source ii) Use
OC6	SUSPENDED	
OC7	SUSPENDED	
OC8	Odour abatement	i) Containment
OC9	SUSPENDED	
OC10	Emergency	

Monitoring and Measurement

MM1	SUSPENDED	
MM2	SUSPENDED	
MM3	Odour	Note: Combined in OC8
MM4	SUSPENDED	
MM5	SUSPENDED	
MM6	Site & operations	Note: Combined in OC3
MM7	Non-conformance and Corrective and Preventive Action	i) Permit conditions ii) Corrective action iii) Legal compliance
MM8	SUSPENDED	
MM9	Complaints and Incident investigation	i) Investigation ii) Public complaints iii) Implementation and monitoring

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	16 of 19

EM1 - Environmental Manual

Training

T1	Training	i) Site controller ii) EMR (s) iii) All staff
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Audit and reporting

AR1	Environmental Management System Audit and Reporting	i) Environment system audit ii) Annual reporting
AR2	Management Review	i) Annual review meeting

Roles and Responsibilities

SM1	Staff Responsibilities	i) Legal Obligations ii) Responsibilities
MR1	Management Responsibilities	i) Legal Obligations ii) Responsibilities

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	17 of 19

EM1 - Environmental Manual

Appendix EM1-5: Amendment Details

This record shows details of all amendments.

Amend No.	Date	Section	Page No.	Details of Amendments	Issue No.
-	25.01.17	All	All	New Document	1

Filename	Issue No.	Date	Issued by	Authorisation	Page
EM1 - Manual	1	25.01.17	GBPP	ECGE	19 of 19