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CAMBRIAN PET FOODS LIMITED

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

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1. INTRODUCTION

1.1 Background

Ramboll Environment and Health UK Limited ("Ramboll") was instructed by Cambrian Pet Foods Limited ("Cambrian", or the "Client") to develop a summary of the procedures, processes, tools and techniques which Cambrian has in place to manage the environmental impacts arising from the operation of the Llangadog manufacturing facility located at Tywi Valley Food Park, Station Road, Llangadog, Carmarthenshire, Wales, SA19 9LN (referred to herein as the "site" or the "Facility").

1.2 Scope

The Environmental Management System (EMS) has been developed to meet the criteria set out in the relevant Natural Resources Wales guidance and references how the system constitutes Best Available Techniques (BAT), as described in *PPN_00206_BAT Technical Assessment*.

It is intended to provide an overview of the current practices at the Facility, to manage and limit the environmental impacts arising from the activities at the site.

As a summary, this document provides a high-level overview of the current procedures, processes, tools and techniques employed at the Facility.

2. IMPLEMENTATION OF EMS

2.1 General description of the EMS

Cambrian operates an informal EMS that meets the requirements for Environmental Permitting, and which is consistent with the key requirements of the International Standard ISO14001:2015.

The scope of the EMS covers all activities of Cambrian at the Llangadog facility and will evolve as necessary to incorporate the planned development of the site.

The EMS is based upon:

- an environmental policy;
- the identification of environmental aspects and impacts associated with the facility's operations;
- an assessment of the significance of those aspects in respect of the environmental impacts;
- an assessment of applicable legal and other requirements;
- the implementation of operational controls and procedures to minimise significant environmental impacts and ensure legislative compliance; and
- the setting of environmental objectives and targets.

2.1.1 Site plans

Cambrian maintain a set of site plans, which are drawn to scale and are updated annually, or when processes or infrastructure on site has changed. These plans illustrate:

- The activities carried out;
- Discharge points;
- Drainage plans with surface and foul drains and the final destination of all drainage;
- The location of waste activities and storage areas;
- The location of oil and chemical storage facilities; and
- Sensitive local receptors- neighbours, sensitive wildlife area, rivers, underlying groundwaters.

2.2 Environmental Policy

The management system includes a defined Environmental Policy, developed by Cambrian's Operations Site Director. The policy defines the principles by which Cambrian will operate to minimise environmental impact.

The policy is displayed in communal areas at the Facility. The policy is reviewed by the Operations Director annually) or following a significant change to operations.

2.3 Environmental Aspects and Impacts

Cambrian have identified and prioritised the Environmental Aspects and related Environmental Impacts associated with processes carried out at the Facility. The process for the identification and evaluation of Aspects and Impacts is documented in *BSM-PR.12 Environmental Aspects*. Aspects and Impacts are recorded in *BSM PR09.01.02 Aspects Register Llangadog_A*, along with and evaluation of significance, any mitigating actions or procedures and a reference to applicable legislation.

The Register, which was developed through a review of site operations, operating procedures and risk assessments, is reviewed and updated at least annually, or when an activity, product or process changes.

Environmental aspects and associated impacts are identified not only in normal conditions but also abnormal conditions (during maintenance and shut down for example) and in emergency scenarios (spillage, fire, flood). This provides a defined procedure for identifying significant aspects and aids with the setting of environmental objectives and targets.

2.4 Compliance obligations

Cambrian has identified the legal compliance obligations applicable to the Installation and these are recorded in *BSM PR13.01 Register of Legislation*. The register is managed by the Technical Manager and is reviewed annually and updated as necessary.

2.5 Environmental objectives

Cambrian have developed environmental objectives to help reduce the environmental impact of their significant aspects. Environmental objectives are developed and agreed upon by the Operations Director and are regularly monitored by the objective owners and reviewed annually as part of the management review process.

3. RESOURCES AND COMPETENCE

3.1 Resources

The Operations Director ensures appropriate resources are in place for the appropriate running of the Facility. This includes assessing the resources required to implement and maintain the EMS and to adhere to the environmental permit, and providing resources accordingly. Resource requirements are reviewed at least annually as part of the Management Review Procedure.

3.2 Roles and Responsibilities

The Operations Director is accountable for the Facility's compliance with environmental legislation, requirements of the permit and conformance with the EMS.

At an operational level, overall responsibility for environmental management rests with the Technical Manager. This post is responsible for maintaining the EMS. Within the wider team there are a number of personnel responsible for specific environmental aspects including energy efficiency, waste management, effluent treatment etc.

3.3 Training and competence

The Facility operates a comprehensive training programme for all new employees. The HR Manager is responsible for ensuring that all employees are trained and competent to undertake their responsibilities where they have the potential to have an impact on the environment, or which relate to the EMS.

The HR Manager is responsible for ensuring that training and competency records are maintained. In addition to the induction, relevant line managers regularly assess the competency of staff within their areas. A training matrix is retained detailing additional training needs for specific job roles, and engineers are given training as appropriate.

Work Instructions give further instruction and guidance on specific tasks, and include environmental aspects, for example, compliance with relevant environmental legislation.

Members of staff with direct responsibility for the management of the EMS are deemed to be competent to fulfil their roles through professional experience and academic qualification, and evidence of a good understanding of the requirements of environmental legislation and environmental management.

3.4 Awareness and communication

All new employees receive an induction, which includes general environmental information and responsibilities. This induction also informs all employees of the procedures for responding to environmental incidents. All employees are required to complete an Environmental Awareness Competency Test, which is documented and refreshed every 3 years.

Cambrian communicate environmental information to relevant stakeholders as required. Cambrian will communicate environmental information as required by the environmental permit.

3.5 Contractor controls

Only approved contractors are allowed on-site, all of whom are assessed for suitability against a range of criteria dependant on the work to be carried out. During the planning stage the work is assessed and risk assessments and method statements produced. All contractors undergo a site induction and are issued with a permit to work, highlighting risks to health, safety and environment.

4. OPERATIONAL CONTROL AND MAINTENANCE

4.1 Procedures

The Facility has established and implemented Work Instructions (WIs) and operating procedures to control day-to-day operations that have the potential to have significant environmental impacts. These include WIs relating to the operation and maintenance of the Effluent Treatment Plant.

4.2 Planned Preventative Maintenance

Maintenance requirements are determined by the Operations Manager and are based on Cambrian's experience of the machines and the service schedule recommended by the manufacturer. These planned preventative maintenance requirements are recorded on the maintenance schedule, which indicates what will be maintained and when.

4.3 Installation security

Either production staff or cleaners are present on-site Monday to Friday from 5am until late-night. The site is locked up when no staff are on site, and the Engineering Manager is on call throughout the night and over weekends. CCTV covers the site, which is secured by fencing and turnstile type gates with authorised access only. All visitors and contractors enter through the reception area and are escorted by site personnel when on site. The size of the Facility, and low staff numbers means that any person trespassing on the premises would be easily identified and escorted off-site.

4.4 Closure

Cambrian will develop a site closure plan once the Environmental Permit has been issued.

5. ACCIDENTS, INCIDENTS AND SUPPORT

5.1 Accident and incident management and Business Continuity Planning

The environmental aspects process (2.3) is the first stage of developing an Accident and Incident Management Plan and a Contingency Plan. The environmental aspects process is a risk assessment that considers the environmental impact that would result from reasonably foreseeable emergency situations and incidents affecting the business which may lead to adverse environmental impacts, e.g. a fire or flood, or failure of a key piece of plant such as the effluent treatment plant. As such significant environmental aspects are the basis from which emergency and business continuity plans are developed.

Cambrian has developed and implemented a spill response procedure. which provides detailed information relating to the actions required to respond to a spillage at the Installation.

5.2 Complaints

Complaints received by the site (for example, noise or odour complaints) are recorded, to ensure appropriate follow-up and subsequent closure of the complaint.

In the event that a valid complaint is received, Cambrian will:

- Identify the cause;
- Minimise the impact of the activity causing the problem;
- Investigate the root cause of the problem;
- Take steps to ensure the problem is not repeated, which may include replacing a piece of equipment or procedure;
- Record the complaint and the actions taken to investigate and resolve it;
- Amend the management system to reflect any changes;
- Communicate feedback and corrective actions to relevant interested parties, including neighbours and the complainant; and
- Reflect on the outcome of any investigation to continually improve operations and the management system.

Management of noise, odour and other nuisance complaints is described fully in the Cambrian Noise and Odour Management Plan.

5.3 Documented information

Cambrian ensure that documented information relating to the EMS is:

- controlled;
- made available to relevant employees;
- is suitable for use;
- adequately protected;
- identifiable; and
- regularly reviewed and approved as necessary.

Documented information includes records of monitoring and measurement, the environmental policy, this manual, minutes and outcome of management reviews and compliance assessments.

6. PERFORMANCE EVALUATION

6.1 Monitoring and Measurement

Cambrian adheres to procedures for the monitoring and measurement of certain environmental aspects associated with the facility's operations. This includes utility and raw material use as well as waste generation and emissions monitoring.

Analysis of water discharge is carried out daily, and waste production, energy and water usage are recorded and analysed on a monthly and annual basis. The results of this monitoring are used to calculate production efficiency in terms of waste and raw material and utility usage per tonne of finished product, allowing targets to be set and Key Performance Indicators (KPIs) monitored.

6.2 Emissions and monitoring

Cambrian carries out monitoring of its emissions to air and surface water to maintain compliance with permits and discharge consents, and to ensure that emissions are not having a negative impact on the environment, or sensitive receptors. Table 6.2 identifies emission points, receptors and the measures in place to control these emissions, including frequency of monitoring, methods used, and the procedures followed to assess these measures.

Table 6.2 Monitoring and measurement

| Emission/ usage | Frequency of monitoring | Parameter | Location reference | Procedures used to assess the measure | Receptors |
|------------------------|--------------------------------|---|---------------------------|--|--------------------------|
| Air- Boiler | One off analysis | NO _x (as NO ₂) NO CO SO ₂ CO ₂ Total particulate matter PM ₁₀ / PM _{2.5} Oxygen Moisture Gas Flow | A1 | BS EN 14792 MCERTS Accredited BS EN 14792 MCERTS Accredited BS EN 15058 MCERTS Accredited BS EN 14791 MCERTS Accredited BS EN 12039 MCERTS Accredited BS EN 13294-1 MCERTS Accredited BS EN ISO 23210 BS EN 14789 MCERTS Accredited BS EN 14790 MCERTS Accredited BS EN 13294-1 MCERTS Accredited | Air, workers, residents. |
| Air- Boiler | Annual | NO _x O ₂ CO ₂ CO Temperature Efficiency | A1 | Annual service by certified gas contractor. | Air, workers, residents. |

| Emission/ usage | Frequency of monitoring | Parameter | Location reference | Procedures used to assess the measure | Receptors |
|--|--------------------------------|--|--|---|--------------------------|
| Air- Boiler | 3-yearly | NOx CO | A1 | BS EN 14792 MCERTS Accredited BS EN 15058 MCERTS Accredited | Air, workers, residents. |
| Surface water- Afon Tywi (Discharge Consent, issued by the Environment Agency (BG0002801), for the discharge of treated trade effluent) | Daily | pH Temperature Suspended solids COD Phosphate Nitrate | S1 | Samples sent to external lab monthly for MCERTS Accredited testing. Results compared for calibration of internal methods. | Afon Tywi SSSI & SAC |
| Surface water- Afon Tywi | Monthly | pH Temperature BOD Suspended solids | S1 | Results supplied by NRW | Afon Tywi SSSI & SAC |
| Odour | Daily | Sniff test | M1, M2, M3, M4, M5 (locations where monitoring takes place) | Complaints monitoring External assessment by Carmarthenshire County Council | Local residents |
| Noise | Daily | | M1, M2, M3, M4, M5 (locations where monitoring | Complaints monitoring | Local residents |

| Emission/ usage | Frequency of monitoring | Parameter | Location reference | Procedures used to assess the measure | Receptors |
|---|---|---|--|--|---------------------------------------|
| | | | takes place) | | |
| The facility also has 5 wells for the abstraction of groundwater, four of which are currently in use. | Daily | Volume extracted | W1, W2, W3, W4, W5 | | |
| Groundwater monitoring wells | Monitoring undertaken in 2018 (no contamination present). Regular monitoring not considered necessary due to no contamination and the low risk of further contamination occurring. | NA | WS02, WS03, BHA, BHB, BHC, BH1, BH2, BH7, BH8, BH10. | See Environmental Permit Site Condition Report | Groundwater |
| Energy | Monthly | Electricity Natural Gas | Site | Meter readings, bills from utilities provider | Climate, air quality |
| Waste | Monthly | Volume, waste type and destination (landfill or recovery) of all wastes collected from site | Site | Data provided by waste contractor | Various – dependent on disposal route |

6.3 Evaluation of compliance / internal audit

At least annually Cambrian undertake an evaluation of compliance against:

- the requirements of the environmental permit;
- environmental legislation; and
- the requirements of this EMS.

The results of the evaluation are reviewed during the management review process and are taken into account when environmental target and objectives are being set and reviewed.

Any nonconformity identified will be managed using the non-compliance and corrective action procedure (6.4).

6.4 Non-compliance and corrective action

Cambrian can identify non-conformance against the environmental permit requirements, environmental legislation or the Cambrian EMS during normal activities, after emergency scenarios, through the evaluation of compliance / internal audit process (6.3), during normal activities and after emergencies and incidents.

Non-conformities are recorded, and corrective actions determined and tracked.

6.5 Management review

At least once per year the senior management team of Cambrian undertake a management review meeting to review the EMS to ensure its continuing suitability, adequacy and effectiveness. This meeting includes a standard agenda covering the review of environmental aspects, resource requirements, progress against environmental objectives, agreeing objectives for the forthcoming year, reviewing any accidents or incidents or non-conformances.