

Staff Handbook

Section 3

Environmental Management Guidance

Holyhead Marine Services Ltd.

Newry Beach Yard

Holyhead

Anglesey LL65 1YB

North Wales, UK.

Contact:

Telephone: +44 (0)1407-760111

Fax: +44 (0)1407-764531

Contents

3.	Environmental Management Supplement.....	3
3.1	Introduction	3
3.2	Scope.....	3
3.3	Environmental Policy Statement	3
3.4	Environmental Aspects and Impacts.....	3
3.5	Legal Compliance Register	3
3.6	Objectives and Targets	4
3.7	Structure, responsibilities, and resources	4
3.8	Sub-Contractors, Suppliers and Ship Representatives	4
3.9	Training, Awareness and Competence	5
3.10	Communication (Internal & External)	5
3.11	EMS Documentation	8
3.12	Checking and Corrective Actions	8
3.13	Problem Identification, Corrective Action and Prevention	8
3.14	Environmental Management System Internal Audit	9
3.15	Management Review	9
3.16	List of Environmental Management Procedures	9
	PR-01. DOCUMENT CONTROL PROCEDURE.....	10
	PR-02. TRAINING AND COMPETENCE PROCEDURE	12
	PR-03. SPILL RESPONSE PROCEDURE	14
	PR-04. EMERGENCY RESPONSE PROCEDURE.....	17
	PR-05. NON-CONFORMANCE AND CORRECTIVE ACTION PROCEDURE	22
	PR-06. WASTE MANAGEMENT PROCEDURE.....	25
	PR-07. PLANNING AND DESIGN	27
	PR-08. INTERNAL AUDIT PROCEDURE.....	29

3. Environmental Management Supplement.

3.1 Introduction

Holyhead Marine Services recognises that its activities interact with the environment. In some cases it has been identified that these interactions can lead to adverse environmental impacts. The company aims to manage its environmental impacts through the implementation of an effective environmental management system. To demonstrate this commitment, the company will develop its environmental management system to conform to the requirements of ISO 14001:2015.

This will allow us to continually improve our environmental performance and conduct our activities in an environmentally responsible manner. In brief, the environmental management system will aim to achieve:

- Compliance with environmental legislation and other relevant requirements;
- Awareness amongst employees, contractors, customers and visitors of our main environmental impacts and how to control them;
- Determine company objectives and targets.
- We acknowledge our environmental impacts, risks and opportunities affecting our business both internally and externally.
- Continual improvement of the company's environmental performance.

This Manual describes how Holyhead Marine Services' management system meets the requirements of the Standard

3.2 Scope

The management of design and the construction and maintenance of marine craft including on-site and in-house fit out and refit. Manufacture and repair of machined and fabricated components.

3.3 Environmental Policy Statement

The company updates annually and publishes our Environmental Policy Statement. Please take the time to read it. It is available in the production office, on the Stores Health & Safety Notice Board and on our Website at <https://www.holyheadmarine.co.uk/>

3.4 Environmental Aspects and Impacts

Holyhead Marine assess our work activities and how these can impact the environment. It is important that all tasks are undertaken with careful consideration for preventing pollution and minimising waste. No oils, fuels or chemicals should be allowed to enter our drains, the sea or for dust and debris to blow over our boundary fences. Waste must be segregated and reused or recycled. Segregating waste is part of this and it's a legal requirement.

3.5 Legal Compliance Register

The company maintains a Legal Compliance Register which is checked and audited against our work activities to ensure compliance. It is important that we act responsibly and meet

our legal obligations. Inspections are made to ensure waste is managed correctly and that everyone reports spills as a non-conformance. Spill prevention and emergency action capability is vital to legal compliance. It is everyone's job to follow our environmental procedures and act responsibly, especially where waste segregation is concerned.

3.6 Objectives and Targets

Holyhead Marine Services establishes measurable environmental objectives which are instrumental to achieving continual improvement. Objectives are highlighted from the outputs from our Environmental Management System so ensuring good quality information and data including non-conformance reporting of covering spills and waste issues are vital.

3.7 Structure, responsibilities, and resources

Managing Director

The Managing Director has overall responsibility and decision-making powers for the company. The Managing Director is also responsible for ensuring adequate resources are available for an effective Environmental Management System. Periodic Production Meetings are arranged, and a range of current business matters are discussed, and strategic decisions are made. Health, Safety and Environmental matters are included on the Management Team weekly meetings.

Safety & Environment Manager

This role involves planning and designing the EMS. Performance measuring, investigations, advising, managing internal audit schedules, and participating in external audits. Individual members of staff throughout the company are available to facilitate this process.

Project Managers & Supervisors

Responsible for ensuring the requirements of the environmental management system are implemented on a day to day basis.

Workforce

Responsible for following the company rules, procedures and guidance and for working in a tidy responsible manner. Engineering Staff should also follow their training and pay consideration to how their activities may impact on the environment and work to reduce such impacts.

3.8 Sub-Contractors, Suppliers and Ship Representatives

Holyhead Marine Services is required to assess the standards of Sub Contractors and Suppliers to ensure they work in line with our Environmental Policy and are aware of Spill response and Emergency Action Procedures. Ships Crews and Customer Representatives have an induction. All personnel on site whether employed, Contracted or Customers have a responsibility to work within our environmental management system requirements.

3.9 Training, Awareness and Competence

All Holyhead Marine Services Employees have been provided with waste disposal and streaming requirements and Environmental Awareness Training including Spill Response and Emergency Action Procedure. Training needs are also regularly reviewed as part of a 6 monthly Management Review.

3.10 Communication (Internal & External)

Internal information relevant to the organisation particularly our Environmental Management System will be made available to staff members via their Supervisor, Project Manager or Safety and Environment Manager. External communications referencing parts, equipment or services will be provided through the Purchasing Office based on written or verbal instructions from the Management or Supervisors. If parts or services are ordered, then a Formal Requisition and Purchase Order must be raised. Purchasing of Goods or services should make consideration for positive environmental practice and awareness in line with our Environmental Policy. Written environmental procedures have also been developed with Spill and Emergency Action Plans. These are contained in this handbook.

Understanding the Context of the Organisation: External Communication

External Factors	Context	Interest Rating
Clients	Clients are generally focused on the Vessels build and delivery requirement. They have an interest in Environmental Management, but this is usually explored at the tendering process. The main client concern is that they are not working with a polluter or a company with a poor track record for meeting legal obligations.	
Competitors	Work is usually obtained through competitive tender. Competitors can be well resourced large organisations like BAE, Babcock, or Atlas Marine. Holyhead Marine must deliver its products and services at a competitive rate and demonstrate strong management systems are in place. Security of commercially sensitive information is also essential.	
Environmental / Geographical	Our site has direct access to the sea. While we are unlikely to be affected significantly by flooding, we must also be aware that our activities may easily cause sea pollution. Our geographic location may also hinder recruitment through reduced available skilled labour.	

Regulation & Legislation	Holyhead Marine is subject to UK and European Environmental legislation. We obtain information from various Organisations including the Institute of Environmental Management and Assessment and the Government website for Legislation www.legislation.gov.uk . Further updates and new letter are available from our British Marine Federation Membership	
Market Trends	Market trends are usually technical development that Clients seek to improve operational running of vessels. This communication is usually established during the design stage and documented.	
Suppliers	We have a wide range of suppliers from distributors to Original Equipment Manufacturers. Purchasing is through our Buyers and a clear line of communication exists through requisition to inspection and receipt.	
Shareholders / Board	Holyhead Marine Services is a family run firm. The Board are either family members or current or past employees. Communication is developed and exists for the attention of Senior Management.	
Public / Neighbours	External communication between our neighbours exists to the extent that we have the Coastguards and Stena Ports to consider as part of our work activities. The Public are also considered although not with any form of direct external communication requirements.	
Central / Local Government	Other than environmental legislation, the only other factors are matters of taxation & employment	
Political	It is difficult to influence this area, the UK's withdrawal from the European Union and the associated affects are currently largely unknown. Government grants or subsidies do not usually affect us however our largest customer is the MoD, and their requirements can be dependent on UK Political Policy and government spending restrictions.	

Understanding the Context of the Organisation: Internal Communication

Consideration is required for internal communication systems and how this can impact our environmental performance and working standards. Without internal communication we fail to be an effective organisation.

Business Planning – Considering products lifecycle, product design and resources.

Purchasing – Ensuring we are careful with our purchasing requirements, minimise waste and consider sustainability.

Company Accounting – We need to control operating costs and be profitable to be successful.

Training – The most important aspect of the organisation is the workforce, without understanding, capability, communication, and teamwork the organisation cannot function.

Teamwork – Vital to success and shared values.

Service Delivery – Ensuring our customers can trust us to deliver their expectations.

Meeting Standards – Proving Success, targets, objectives, and Performance Indicators all have an important role in measuring the organisations performance and can be used internally and externally.

Objectives and Targets – Setting goals and continually improving how we work is a necessary endeavour and part of ISO14001 Standard.

Document Control

A formal procedure is in place for controlling documents relevant to the environmental management system. The procedure details responsibilities and the methods used for creating, receiving, processing, distribution and storing documents, records, and data. This process is defined in the Environmental Management Manual – PR-01 Control of Documents Procedure.

Operational Control

As noted in 4.3 the significant aspects and impacts of the company's activities have been identified. Formal operational procedures exist to allow work task to be accomplished in a controlled manner whilst minimising the environmental impact.

Emergency Preparedness and Pollution Prevention

Holyhead Marine have a detailed Spill Response Plan and Emergency Action Plan.

The yard drain plan is also included in PR-03 Spill Response Procedure

Under no circumstances should substances be allowed to enter our Surface Water Drains. All surface water drains run to the sea therefore substances entering the drains will be almost impossible to contain before polluting the sea.

Under no circumstances should substances other than toilet waste be discharged into our foul or sewer drainage system. Toilet discharge is pumped to the town's wastewater treatment facility. Chemicals and substances not associated with biological waste can be extremely hazardous to sewage treatment plants and the people who maintain them.

Holyhead Marine strongly supports the legally enforceable polluter pays principle. IF WE DISCHARGE POLLUTANTS TO THE SEA OR LOCAL SEWAGE SYSTEM OR TO GROUND THEN WE ARE RESPONSIBLE FOR PAYING TO PUT THE DAMAGE RIGHT AND CLEAN UP OUR MESS AND THE ENVIRONMENTAL DAMAGED CAUSED.

3.11 EMS Documentation

The environmental management system operates 3 tiers of formal documents, as noted:

- Environmental Manual (with the Management System Procedures contained within)
- Work procedures and Processes
- Forms (including Incident Report Form)

3.12 Checking and Corrective Actions

Monitoring and Measurement

The company will set annual Objectives and Targets. These will be communicated as necessary. Reviewing and setting of environmental Objectives and Targets is a management review agenda item. Details of achievement, progress and opportunities for future improvement will be recorded in the Management Review meeting minutes.

Compliance for legal duties will be reviewed annually as part of our aspects register annual review. Actions from this will be risk assessed and become part of our prioritised significant hazards list. Significant Hazards review is part of our Management Review agenda.

Results from the above are analysed by the Safety and Environment Manager and decisions are made in conjunction with the Managing Director, Project Managers and Supervisors in relation to the requirement of any further action.

3.13 Problem Identification, Corrective Action and Prevention

The management system has PR-05 Non-Conformity and Corrective Action Procedure for controlling any non-conformity. Problems can be identified in a number of ways for example (but not limited to):

- Monitoring and measuring targets
- Evaluating legal compliance
- Site inspections
- Internal audits
- External audits
- Poor Housekeeping
- Complaints

Where non-conformities arise, the information will be recorded (in accordance with PR-05) and steps taken to mitigate any impacts.

Incident response requirements are detailed in PR-04 Emergency Response Procedure and PR-03 Spill Response Procedure. Guidance on raising an incident report is also contained in PRO001 Spill Process Flow chart.

3.14 Environmental Management System Internal Audit

A programme of internal audits has been developed. Audits are required to test the effectiveness of our EMS and to ensure we are meeting the clause requirements of ISO14001:2015 Standard. The results of our internal audit and any non-conformities identified are part of the Management Review Agenda.

3.15 Management Review

The senior management chaired by the Managing Director will hold an annual Management Review of our Environmental performance to ensure its suitability, robustness and effectiveness in managing our environmental impacts, driving change and improve sustainability through planning, design and delivery of our products and services.

3.16 List of Environmental Management Procedures

PR-01 Control of Documents Procedure

PR-02 Training Procedure

PR-03 Spill Response Procedure

PR-04 Emergency Response Procedure

PR-05 Non-Conformity & Corrective Action Procedure

PR-06 Waste Management Procedure

PR-07 Planning and Design Procedure

PR-08 Internal Audit Procedure

PR-01. DOCUMENT CONTROL PROCEDURE

Purpose

The purpose of this procedure is to show how all the documents within the Company's Environmental Management System are controlled. This procedure ensures that all controlled documents that are in circulation are current and that a log of all past alterations is kept to create a history for reference.

Responsibilities

The Safety and Environmental Manager has overall responsibility for the procedure and to ensure that documents required for the Environmental Management System are approved and authorised prior to release and will be readily available, legible, readily retrievable at all times and retained as required.

Procedure

- 1.1 All documents essential to the operation of the Environmental Management System shall be identified by a document number, titles, issue / revision status and current issue date.
- 1.2 All procedures will be developed in line with this procedure.
- 1.3 All documents shall be reviewed and updated as necessary and re-approved if required. Before any new or amended documents can be released they must be seen and approved for adequacy prior to release by the Safety and Environmental Manager and Managing Director. No system documentation shall be amended within the Environmental Management System (EMS) without the approval.
- 1.4 Any changes to documents shall be recorded on the Controlled Documents Register so the summary of the history of revisions can be viewed. This also ensures current issue status.
- 1.5 Additional copies of certain documents may be issued however the master file will be held in the main office. Only the master file will be the most current copy. Relevant documents will be made available to staff at points of use.
- 1.6 Documents will be held electronically where possible - the electronic version will be deemed the controlled version. Any printed copies will be uncontrolled unless otherwise stated.
- 1.7 Relevant changes to system documentation shall be communicated to staff verbally or via email. Other interested parties shall be informed by e-mail or letter as required.
- 1.8 When revising existing documents, the issue number shall be increased and the document saved as a new version. The history of changes shall be kept on the controlled documents register.

1.9 Any obsolete documents will be identified as 'obsolete' to prevent unintended use. Obsolete documents will only be retained if deemed necessary for the effective running of the Environmental Management System. All superseded documents will be removed from the electronic folder into a superseded folder where they will remain until such time as the retention period for these documents has been decided. All superseded documents in the Master Folder will be removed and placed in another folder for superseded documents. Additional controlled copies apart from the above will be removed and destroyed.

1.10 All relevant documents required for the effective running of the Quality Management System will be adequately protected and electronic documents backed up externally to prevent loss.

1.11 Prior to submission for approval it may be necessary to submit a draft version of a management system document. Draft documents shall be marked with a DRAFT watermark across the document to avoid installation into the system until fully assessed, controlled and approved.

1.12 Records generated as part of the quality management system shall be controlled in such a way that they are easily identifiable, readily available and legible. All records shall be retained for the period of their immediate use unless a longer retention period is required for specific business purposes or to ensure compliance with legal requirements.

1.13 When records are no longer required paper records shall be destroyed by shredding; electronic records shall be deleted as appropriate. HMS has an approved waste stream for shredding and the disposal of confidential records.

External documents:

1.14 All external documents such as client manuals, standards, guidance notes, etc shall be entered into the *External Document Record Register* and all copies of the issue tracked by identification and issue record.

PR-02. TRAINING AND COMPETENCE PROCEDURE

Purpose:

The purpose of this procedure is to ensure the competence of persons undertaking work which may affect the performance and effectiveness of our environmental management system. Competence will be based on appropriate education, training and experience. This procedure outlines the company's intent and mechanisms for the training and development of its employees and others contributing to its services and controls how training needs are identified, set and monitored.

Responsibility:

The Safety and Environmental Manager is responsible for outlining any training requirements to ensure that all employees receive relevant training and to ensure that up-to-date records of staff training are documented and retained. Approval for all identified and proposed training must be authorised in advance by the Managing Director.

To enable training ensuring suitably qualified and experienced personnel to be available the Safety and Environmental Manager will hold an EMS Employees Training Matrix. This will also assist in the training review aspect of the Management Review Meetings. The EMS Training Matrix will be held electronically in V:\Hms-general Secure\Environmental Management ISO14001\Holyhead Marine EMS Documents\Training.

Procedure:

2.1 This procedure sets out the mechanisms in place for the training and awareness of the company's workforce and others associated with its activities, and identifies responsibilities where appropriate.

2.2 Training for employees shall be considered at appraisals or during management meetings where any business development requirements, changes in legislation or shortfalls in competence are examined. Training will be planned accordingly and highlighted on the training matrix.

2.3 The training matrix will identify any training in need of upgrading, renewal or over due. This will be monitored and kept up to date by the Safety and Environmental Manager and details of the training shall be reported to the management team to plan training for the coming months to make arrangements for the release of the individuals to undertake the training.

2.4 Training needs will be monitored periodically to ensure that all employees have undergone the necessary training and experience in order to perform their roles to a suitable level.

2.5 Induction training will be undertaken for all new members of staff to include health, safety, quality and environmental issues.

2.6 Training needs will be reviewed periodically to ascertain whether existing measures are working and to identify new training needs, which may become apparent if the company's processes or activities change.

2.7 Refresher training shall be carried out as considered appropriate to raise awareness of Environmental requirements especially when non-conformities in specific areas have been identified.

2.8 The company shall arrange 'in-house' training by competent and experienced personnel as necessary for ensuring good environmental practice is maintained, to improve company culture and awareness and deliver continual improvements to our environmental practices.

2.9 All external training providers shall be qualified and competent to deliver the required training. In addition, quotes shall be obtained and any funding possibilities identified and secured.

2.10 Records of external training shall be filed in training/personnel files.

2.11 The training matrix shall be updated by the Safety and Environmental Manager as required once training has been received.

2.12 In order to improve the performance of the company's professional and technical staff specific training may be arranged. Staff can request training either during appraisals or by completing a training request form. This will be reviewed by the discretion of the Director.

2.13 Holyhead Marine Services shall ensure that when allocating tasks or positions to employees that it takes into account the abilities, capabilities and competence of each employee. Should an employee be placed in such a position of authority then they are to assume that Holyhead Marine Services are confident of their competence for that task.

2.14 Should an employee, once given or offered such a position, feel not competent for that particular post or task, then they should inform the Safety and Environmental Manager, Line Manager or Managing Director immediately so that appropriate training can be arranged for the employee.

PR-03. SPILL RESPONSE PROCEDURE

Purpose

The following procedure details the measures that should be undertaken when dealing with a spillage in order to avoid an environmental incident. This procedure also refers to the waste management procedure regarding the disposal of any spill clean-up materials.

Responsibilities

It is the responsibility of all employees to ensure that spillages are minimised during activities. The Safety and Environmental Manager will ensure that appropriate spill kits are made available and that staff are competent in how to use them.

Procedure

1 Assess the severity of the spillage. Is it safe to approach and can you contain it yourself? If not then inform any supervisor or manager who will notify the relevant emergency service.

*** Your first priority is to yourself. DO NOT put yourself in danger to contain a spillage***

2 If it is safe to do so identify the spilled material (from labelled material or Safety Data Sheets) and turn off any electrical equipment.

3 Wearing appropriate PPE limit the spill area by blocking, diverting or confining the spill to stop the spill entering any drains/watercourses.

4 At all times the approach adopted will be to:-

Confine the spill (especially from entering a watercourse) – limit the spill area by blocking, confining or diverting the spill using appropriate spill materials socks, booms, barriers

Stop the source of the leak – turn things off, close valves, plug the leak in damaged containers

Contain – by using spill kits. Do not spread by hosing down

Absorb – by using absorbent pads, booms or skimmers. Dispose of all contaminated materials in appropriate containers/heavy duty bags.

Clean up - Remove all used absorbent materials

Dispose – put contaminated materials in an appropriate container. The container will be removed to a licensed site by the approved contractor. Waste consignment notes to be completed and kept as part of the Waste documentation. Waste management procedures apply.

Report – all pollution incidents to the relevant manager and system representatives who will take the appropriate administrative action and contact the necessary governing bodies. Head Office to be contacted and an Environmental Incident form to be completed.

Reorder – replace all used spill kits (even after minor incidents)

5 A supply of pollution control equipment will be made available. For Minor Spills please use the absorbent pads and rags from the store. Bagged sawdust is also available in the Shipwrights Workshop. For significant spills generating an Emergency Situation, in addition to the stores spill materials there is also an Emergency Spill kit in a yellow Wheeled Bin in Bay 3 by the stores door.

Emergency Spill Kit Contains (Bay 3)

- Absorbent Pads – for containment
- Absorbent Socks – can also be used over the narrow drain slits across the main door entry
- Yellow Drain Mat Cover – Polyurethane reusable drain cover. Yard drain Cover
- Large Absorbent Pillows
- Plastic disposable bags for used absorbent waste materials

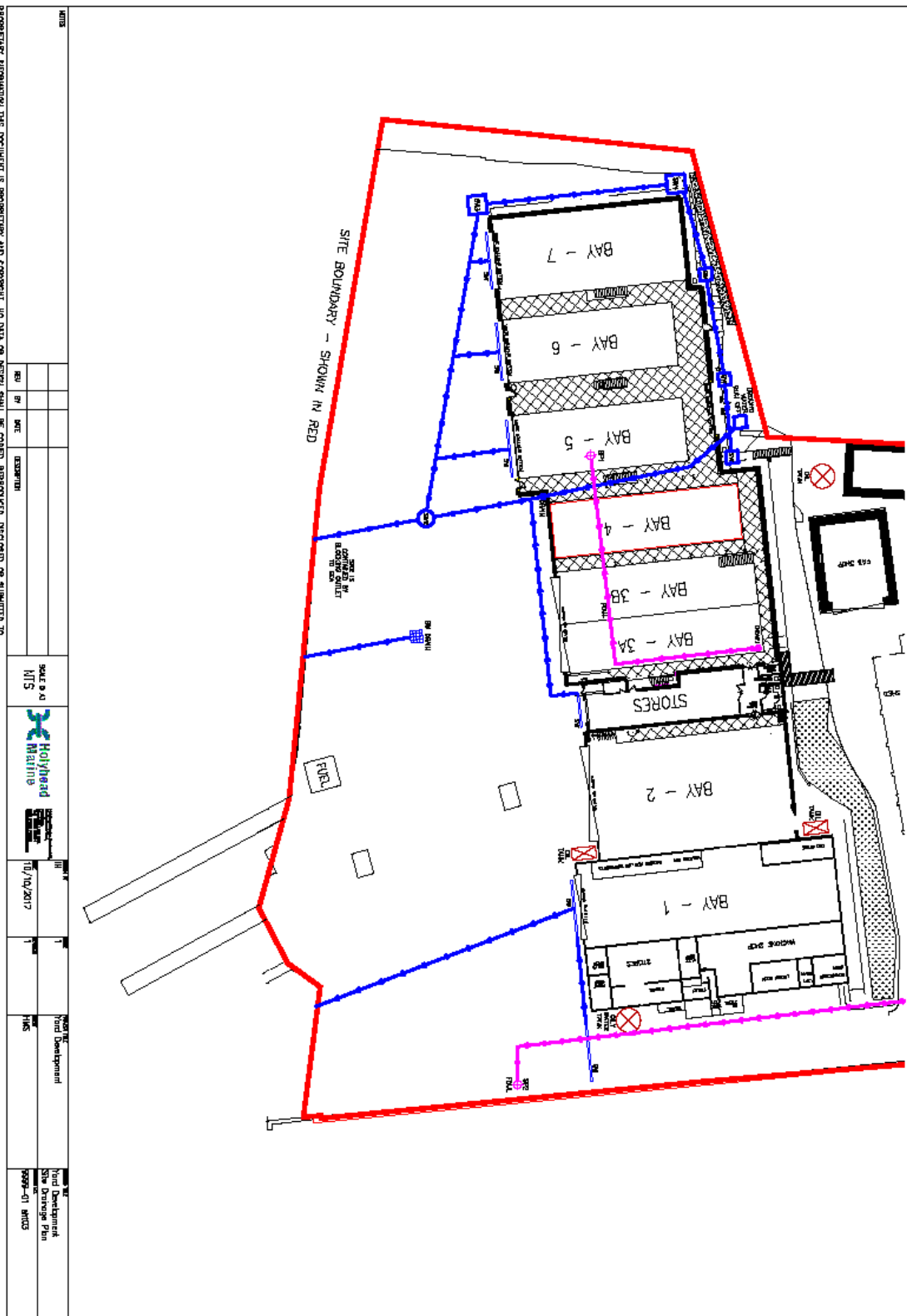
The Emergency Kit is intended for significant spills whereby spillage need containing to prevent the substance from entering the drains or the sea. For Minor spills please use the absorbent materials held in the stores. If spill kits are used the Safety and Environmental Manager must be informed.

6 Fuelling vessels afloat or in the yard.. In the event of a spillage stop the fuel supply from the tanker use absorbent to contain on deck and report the spill. If you are at the Marina report the spill to the marina office who have the equipment and capability to tackle water borne pollution from fuel oils.

7 All the contaminated material and absorbents will be disposed of in accordance with the Waste Management Procedure through their correct waste stream.

8 All spillage into the Sea, (all waste liquid that is allowed to run into the yard Surface Water Drains will end up in the sea) must be reported to the Safety and Environmental Manager Immediately. The company must also report spillages to Natural Resources Wales as soon as possible. So please be aware of the significance of spillages and the release of waste liquids into the environment. They are considered very serious events.

DISCLAIMER: APPROVED THE DOCUMENT IS PROVIDED AS A GUIDE TO DATA OF DESIGN ONLY. THE CLIENT, APPROXIMATE, DESIGNED OR PLANNED TO
 FOR THIS PLAN ON BASIS FOR INFORMATION ON INFORMATION ONLY. IN THE EVENT OF ANY PROBLEMS, DESIGNER SHALL BE RESPONSIBLE OF ANYTHING WHICH SERVICES LTD



PR-04. EMERGENCY RESPONSE PROCEDURE

Purpose

This procedure sets out the mechanisms in place for addressing the emergency preparedness and response requirements by good emergency planning and rehearsed emergency response to minimise the potential for environmental pollution and or significant harm to personnel or assets. The procedure below demonstrates the company's emergency preparedness and response mechanisms.

Responsibility

The Health, Safety and Environmental Manager will have responsibility for identifying and planning for health and safety and environmental emergencies and the response mechanisms required. All relevant staff shall be made aware of the emergency procedures in order to ensure that emergency situations can be dealt with effectively. Everyone has a responsibility to prevent spills and to ensure waste water, chemicals and fuels are not permitted to run onto the yard or workshop floor. We also have duty to keep our workplace tidy and free from obstructions and indiscriminate waste. We must all work to maintain a normal, clean and tidy working environment every day.

Procedure

4.1 General

4.1.1 Potential Emergency situations have been identified as minor and major spillages, fire and flooding. These have been detailed to prevent pollution with actions to prevent or mitigate adverse environmental impacts from emergency situations. Information relating is held in the Site Emergency File.

4.1.4 Emergency procedures will be displayed on site and communicated during site induction and toolbox talks.

4.2 Fire safety planning and control

4.2.1 An electronic fire alarm and heat detectors are fitted within the workshops, fire extinguishers are in place and maintained by Dragon Fire. Visual checks are carried out monthly on fire-fighting equipment, fire routes and fire escapes by the Safety and Environment Manager.

4.2.2 Our fire risk assessment is assessed regularly and we have a high priority status with the Fire Brigade.

4.2.3 In the event of a fire the person discovering the fire shall raise the alarm and those on the premises shall evacuate the building / site immediately and the responsible person shall

summon the emergency services. Copies of the evacuation procedure and responsible persons are posted in appropriate locations within the site.

4.2.4 At an appropriate time the responsible person shall record details of the incident and the action taken.

4.2.5 Fire alarm tests and evacuation should be regularly undertaken with drills recorded.

4.2.6 In the event of a fire the yards emergency fire action plan must be followed as a priority over spill prevention actions. In terms of environmental protection the Fire Brigade will require one point of contact either the Fire Warden (Blue) Supervisor for Incident Information / Fire Brigade Contact, Safety and Environmental Manager or Managing Director. This person will work with the fire service as liaison. If it is possible to cover the drains then this should be done to prevent fire water run entering the sea, however due to the proximity of the sea this may become almost impossible to stop. The Fire Brigade may require the site evacuated depending on the size and nature of fire. Their instructions overrides any company procedure for Environmental Management.

4.3 Spillage/pollution of land and water

4.3.1 All materials with the potential to cause a pollution incident such as oil, fuel, antifreeze, oily bilge water, chemicals and hazardous materials are to be stored in appropriate containers and banded where necessary.

4.3.2 Appropriate spill kits/spill materials to be made available in the stores or emergency spill kits appropriate to deal with any potential spillages which may occur. Instructions in the use of the kit shall be held with the equipment for reference. After use, the spillage control materials shall be suitably placed for disposal by the correct route following waste procedures. Spill materials can be obtained from the stores.

4.3.3 In the event that a pollution incident should occur the result of spillage shall be addressed locally by the relevant Supervisor who shall urgently arrange the clean-up of the spill or contaminated area so as to prevent washing into water courses.

4.3.4 All spillages shall be contained by use of spillage kits, absorbent granules etc. to prevent pollution of water courses following the spill response procedure.

Major and minor spillages have been determined below:

For Minor spillages (which occur under abnormal situations):

These include minor spills in the yard or washing equipment that has resulted in a slight oily residue contained within yard water run-off. Liquids and substances left unattended in marked containers, unmarked ports and containers contain unspecified liquids not exceeding 5 litres. Untidy working areas and unapproved items present on the walkways.

Minor spillage response

These are to be contained and cleaned up using spill containment materials from the stores. Contain all water, detergents and degreasers during washing mechanical parts especially strong acids like pickling pastes. Dispose of all wastes and used absorbent materials appropriately as outlined in the Waste Management Procedure. Managers and Supervisors hold overall responsibility for ensuring the engineering staff under their control keep the workplace tidy preventing abnormal situations.

Major Spillages (which occur under emergency situations)

These include significant spills that has resulted in clear sea water pollution with oily films present on the sea extending beyond our travelift piers. Significant spills of chemicals or fuels that required action as identified in PR-3 Spill Response Procedure. These Spills must be reported to the Safety and Environmental Manager or Managing Director Immediately. They may also require Fire Brigade response if loss of control or containment is likely.

Major Spill response

Use the 'Emergency spill kits' located in the workshop. For emergency situations resulting in a significant spillage that has led to environmental harm or a spill that has resulted in the containment of substance that have the potential for serious pollution follow PR-3 Spill Response Procedure. The emergency spill kit contains various absorbent materials and a drain cover for the square drain in the centre of the yard.

Absorbent pads and booms available in stores and in the emergency spill kit are all intended to prevent substances from going into our sties surface water drains (Please see the site drain plan)

If the spillage is extensive and it is likely we may lose control of the incident the Safety and Environment Manager and Managing Director should be informed at the earliest opportunity. Fire Brigade response may be required to cope. Holyhead Fire Station have an environmental tender appliance equipped with extensive spill containment equipment and pumps. It is the responsibility of the Safety and Environmental Manager or the Managing Director to call the fire brigade to assist in a major spillage / pollution incident and therefore should be informed at the earliest opportunity of a situation of this scale.

4.3.5. All contaminated spillage control materials shall be disposed of in accordance with legislative requirements, e.g. hazardous waste following waste procedures.

4.3.6 Spillages of substantial amounts of hazardous materials shall be reported to the authorities – including the fire authorities if the materials are flammable and have spread to dangerous areas. The Safety and Environment Manager must be informed of spillages of this nature and is responsible for informing the authorities.

4.3.7 If an Emergency situation occurs the Supervisor leading the engineering team on the job connected to the spillage must record the incident in the company's Non Conformance Register and report the pollution/spillage to the Safety and Environmental Manager.

4.4 Flooding

In order to prevent flooding resulting in an emergency situation a regular maintenance programme is in place to regularly review and maintain the drainage system on site. A drain plan has been developed and the manholes are regularly checked. This is detailed in the pollution prevention plan and emergency response file.

4.5 Response practise

4.5.1 The Health, Safety and Environmental Manager shall ensure that the emergency preparedness procedures referred to above are practised at appropriate intervals and that the emergency preparedness equipment is checked at regular intervals.

4.5.2 Fire drills will be carried out annually and the results of the evacuation recorded. Where issues are identified (e.g. excessive time taken to evacuate premises or non compliance with the fire plan) corrective actions will be implemented to resolve the problems.

4.5.3 Procedures for other emergency situations, will be tested either by physical drills or desk top reviews as appropriate at least once per year or once per project. Results of the tests will be recorded and where issues are identified actions will be implemented to resolve the problems.

4.5.4 Where emergency situations could impact on people other than those working on and behalf of The Company, e.g. neighbours, they will be included in any planning/ communication of the tests and results of the tests as appropriate.

Response review

4.5.5 These procedures shall be reviewed and revised as necessary following any incident or emergency.

4.6 Communication

4.6.1 Information on the actions to be taken in the event of an emergency will be effectively communicated to all employees during the induction process and periodically should there be any significant changes to the procedures.

4.6.2 The identity of persons with responsibilities in the event of an emergency (i.e. first aiders, spill team) will be communicated to all employees.

4.6.3 Emergency procedures will be posted in prominent positions around the site to instruct employees of the procedures to follow in the event of an environmental incident or accident.

4.7 Emergency contact details

HEALTH AND SAFETY ACCIDENTS AND INCIDENTS

- Report to Safety and Environment Manager or General Manager.

ENVIRONMENTAL INCIDENTS

- Spillages – Refer to PR03-Spill Response procedure
- Emergency Actions – Refer to PR04 Emergency Response Procedure
- Fire – Refer to Health & Safety, Fire Action Plan
- Report Incidents to Safety and Environment Manager or Managing Director as detailed in PR03 Spill Response Procedure and PRO001 Spill Process Flow Chart.

SITE ENVIRONMENTAL AND HEALTH AND SAFETY EMERGENCY CONTACT DETAILS SHALL BE POSTED ON NOTICE BOARDS WHERE RELEVANT.

All Health Safety and Environmental incidents shall be reported and recorded and appropriate action taken to prevent recurrence.

PR-05. NON-CONFORMANCE AND CORRECTIVE ACTION PROCEDURE

Purpose:

The purpose of this procedure is to ensure that mistakes and errors which may occur during the implementation of the Company's policies, procedures and services are addressed in a manner which not only allows for appropriate action to rectify the error but provides a means by which the cause of the error can be determined and the error prevented from reoccurring. By addressing non-conformances in a meaningful way, the company can demonstrate continual improvement in its performance. The procedure below sets out the mechanism to be followed for addressing non-conformances, including complaints, associated with the implementation of its Environmental Management System.

Responsibility:

It is the responsibility of all staff to ensure they work with consideration for the Environment and within the policies and instructions issued by the company. If any non-conformities occurs within areas concerning Pollution, Waste Management, and Spillages or with the company procedures, it is the responsibility of the Safety & Environmental Manager to investigate and review the actions. Non conformities may also be raised for poor housekeeping standards and issued to the Supervisor concerned and the person responsible.

Procedure:

Non-conformities can be identified during internal audits, during manufacture, during routine inspections, during normal operating circumstances or as a result of investigations. All nonconformities should be addressed in the manner set out below.

5. Product non-conformities

5.1 Complaints

5.1.1 Complaints may be received directly from our customers, members of the public, a fellow employee or through an enforcement agency like Natural Resources Wales, the Police or Fire Brigade. Stena Ports and the Coastguard may also convey complaints. These organisations are listed in the EMS Interested Parties Document for further contact details.

5.1.2 All complaints shall be recorded in the nonconformity register by the recipient of the complaint, identifying their contact details, details of the complaint, etc. with any report forwarded to the Safety & Environmental Manager.

5.1.3 The Safety and Environment Manager or Managing Director shall respond to the complaint urgently to minimise the risk to the company and to ensure that the complainant recognises the importance the company places on the concern raised.

5.1.4 Details of the findings, recommendations and corrective action taken along with any associated information shall be entered on the non-conformity report form or nonconformity (complaints) register. The Safety and Environmental Manager or Managing

Director shall liaise with the supervisor/operative and any other appropriate personnel to ensure the satisfactory implementation of the actions identified and shall follow up the complaint after the action has been taken to ensure that the complainant is satisfied with the outcome (using discretion as appropriate, dependent on individuals involved).

5.2 Non-conformity at work

5.2.1 A non-conformity exists where circumstances are such that either pollution has occurred or there is a significant danger of pollution occurring. Please also refer to PR04 Emergency Action Procedure for the specification what leads to an Emergency Situation. If an Emergency Situation has occurred or there is potential for an emergency through poor substance/articles storage, handling, waste management or poor housekeeping then a Non Conformity should be raised.

5.2.2 The above requirement should be considered for areas covering spills, housekeeping, legal duties, waste handling and disposal and Documentation.

5.2.3 Work actions completed which have led to environmental damage or generated an Emergency Situation must be reported to the Safety and Environmental Manager and the details recorded on a non-conformance report. In addition and where appropriate, photos shall be taken to show details of the non-conformance.

5.2.4 Non-conformance Reports are also required for poor storage of substances/articles or inappropriate housekeeping that has the potential to create an emergency situation.

5.2.5 The action to be taken to deal with the non-conformity and to prevent recurrence shall be recorded and addressed.

5.2.6 If the environmental non-conformity occurs on a customer based project for example a new vessel causes pollution while on sea trials then company shall ensure that the customer is made aware of this non-conformities as appropriate to the contractual terms. Yard based in house non-conformities like spillages and housekeeping issues do not require any customer notification. These are to be managed within our Environmental Management System.

5.3 Supplier non-conformities

5.3.1 Supplied non-conforming products or services shall be addressed as a nonconformity and recorded and reported as above. (Further details on Supplier requirements and specification that may lead to non-conformities are contained in EMS Procedure PR-07 Planning and Design).

5.4 Review of the effectiveness of the corrective and preventative actions

5.4.1 All non-conformances shall be reviewed and signed off by the Safety and Environmental Manager or Managing Director. In addition, all non-conformances raised shall be reviewed at the routine management review meetings and the effectiveness of the actions taken confirmed. Where trends in non-conformances are detected, changes to the

management system shall be introduced or implementation reinforced. In the case of supplier or sub-contractor non-conformities, the supplier/subcontractor may be removed from the approved suppliers / sub-contractors list.

PR-06. WASTE MANAGEMENT PROCEDURE

Purpose

The purpose of this procedure is to communicate how Holyhead Marine Services manages its business waste. It deals with waste generated through normal business activities. However as our work is diverse we may also produce waste that is unusual and may not necessarily fit into our current waste disposal routes. Should this occur then please seek the advice of the Safety and Environmental Manager before disposal.

Responsibilities

Everyone has a duty to dispose of their waste carefully and in the right way. We have legal duties to manage waste properly. It is upto each of us to keep our work area, benches or vessels tidy at all times and to encourage others to do so through good housekeeping and professionalism. It is the responsibility of the Supervisors to ensure this is achieved and applies across the all teams.

Procedure

The yard is equipped with colour coded bins for different types of waste. It is important that the correct waste gone into the right bin.

Waste disposal routes are notified on the notice board outside stores. This notice board contains a "Waste Items" list which is colour coded to match the relevant bins for the waste product. The list also details bin locations and materials acceptable for disposal. If you have a waste item not listed then please seek the assistance of the Safety and Environmental Manager before disposal.

There mixing waste is unacceptable and dangerous particularly paint or resin activator/hardener. This type of waste must be advised to the Safety and Environmental Manager who will arrange disposal. Activator/Hardener should remain in its original packaging and have a secure tight lid on the container.

If for any reason you are unsure of the correct disposal route for a waste item then seek advice from your Supervisor, Project Manager or Safety and Environmental Manager first before throwing it away.

General Waste (Green Bins) should not contain paint contaminated rags, rollers, brushes or empty tins. Nor should Oily waste or oil contaminated rags, aerosols or any of the other waste items listed in the "Waste Items" list on the stores Notice Board. Likewise the colour coded bins should only contain their intended items. Failure to wilfully dispose of items in the wrong bins will result in an immediate final written warning for the individual as the consequences to the company of poor waste management is significant.

The yard does not produce food waste however any waste from packed lunches should go into the canteen bins only at break time. It is not permitted to have food in the workshops.

Food waste in the Workshop bins is also a disciplinary offence as no bins are provided for this type of waste.

Non-conformance reports are also required for poor storage of substances/articles or inappropriate housekeeping that have the potential to create an emergency situation must be identified and immediate preventative action taken to remove the potential Hazard or barrier, segregate or und the item or article until the situation can be made safe. All relevant personnel shall be informed of the prevention situation. This requirement is also detailed in PR06 Waste Management Procedure.

PR-07. PLANNING AND DESIGN

Purpose

Holyhead Marine Services has a duty to consider environmental controls at the design stage of the work packages or vessel new build project. It is vital that environmental issues throughout the products life cycle are built into these decision processes.

To this end jobs should consider environmental impacts at key product realisation milestones to deliver best current environmental practices for Design, In-Service Life and End Disposal of the product.

Responsibilities

It is the responsibility of the Project Managers in partnership with the Managing Director to consider and guide work planning and decision process. This includes providing guidance and leadership to Naval Architects and if appropriate to Customers, to build in good environmental performance for the product and its manufacture thereby reducing its environmental impacts throughout the lifecycle from concept to delivery and end disposal.

Procedure

Holyhead Marine Services Management have the responsibility to ensure environmental aspects of our work are considered and the environmental impacts of our actions are minimised at the following stages of our products or services lifecycle.

- Pre-Qualifying

We must demonstrate commitment to good environmental management by holding and retaining ISO14001 Accredited Environmental Management System.

- Tendering

Show commitment and leadership with proposals that clearly establish good practice. The priority is to understand the customer needs as a failure to understand this is the most wasteful outcome of all. Planning and design should be detailed enough to ensure we fully understand the customer and they understand us. Holyhead Marine should hold documented evidence of design requirements and acceptance at the tendering stage.

- Planning/Design

Plan the work or vessel design to incorporate environmentally friendly options in terms of substituting materials and machinery in preference for environmentally sound options, reducing chemical agent for water based products or minimising harmful substance use. Also demonstrate consideration for how vessels/equipment will be maintained and how maintenance activities impact on the environment. Ways to extend product life span through maintenance and design leading to easy upkeep by exchange for major components, and also for sustainable purchasing through suppliers that design and manufacture components using renewable materials or materials made using recycled raw materials.

The design element of the product and service delivery must be supported by documented evidence of design discussion, records of meetings and drawing that are approved and accepted by the customer.

- Contract

Working with the customer to recognise the importance of suitability and to identify how the product in turn can be reused or recycled at the end of its functional life. Evidence of funding or staged payment plans should also be available to ensure the design and product realisation as planned can be achieved.

- Delivery

To deliver a vessel, service or engineering solution that has been built with care and thought for the environment, that is functional and meets the customers' requirements with a long service life.

Smaller Jobs including maintenance work should be viewed in the same way as new build projects with consideration for substituting processes, materials and substances for more environmentally friendly options, purchasing for sustainability and minimising environmental impacts of the job.

Supplier non-conformities

Parts or services bought in should be chosen at the design stage for sustainability ensuring parts obtained are from a sustainable source or are manufactured from recycled material.

Non-conforming products or services shall be addressed as a nonconformity and recorded and reported in line with procedure PR-05 Non-conforming and Corrective Action procedure.

PR-08. INTERNAL AUDIT PROCEDURE

Purpose

Internal auditing is essential to the effective running of the yards ISO14001 Environmental Management System. Many areas will also cross over with ISO9001 Quality Management System.

The aim is to test our own working activities to ensure we are meeting both the requirements of the relevant International Standard and that we also achieve our own goals, targets, procedures and methods of work which we have set out.

Internal audits help identify any failings, classed as Non-conformities, our Environmental Management System (EMS) seeks to prevent these, in particular breaches of legislation, spill prevention and emergency action planning as well as top management commitment, leadership and commitment so we can deliver good practice and levels of environmental awareness associated to the business activities for everyone concerned internally and externally of the Organisation.

Responsibilities

8.1 Our Managing Director and Safety & Environmental Manager are responsible for meeting the requirement of our Environmental Policy and its delivery in practical terms through work outputs.

8.2 Environmental & Safety Manager is responsible for planning, arranging and scheduling our internal auditing programme, including implementing corrective actions.

8.3 The Safety & Environmental Manager is not permitted to undertake internal audits to ensure an impartial audit is achieved.

Procedure

***All EMS Documents are held electronically in HMS General Secure/Quality and Environmental Folder/Environmental Management ISO14001/Holyhead Marine EMS Documents ***

- Review the electronic document: Internal Audit Plan. This should be used to help you plan your internal audit. It will be updates from the previous audit so any outstanding areas of the standard not previously tested at internal audit can be included.
- Use the Internal Audit Plan to help review major areas of work and how these areas can be applied to the ISO14001 Standard Clause Sections 4 to 10. It is important that all the Clauses within the Standard are applied to an internal audit at least once per year. The table in the Internal Audit Plan helps identify this.

- Choose a job and some associated focus areas from the Internal Audit plan to plan and conduct your audit.
- Record within your audit which focus areas you have applied, so following audits can look at any remaining areas to cover all the standard clause areas. The Safety and Environmental Manager will update the Audit Plan and implement any recommendations or corrective actions as a result of the audit findings.
- As part of your audit planning ensure that our EMS Procedures and Processes are included as applicable to your audit and record in your audit which procedures you have considered and tested.
- Internal and External Reference documents for use in the Audit are listed at the bottom of the Internal Audit Plan electronic document.

Process Requirements - Use the following Internal Audit approach.

1. Review Set Standards, HMS EMS Documents, and ISO Standard 14001.
2. Examine our Activities to the Set Standards to measure Current Practice.
3. Compare results and identify any failures.
4. Make recommendations for change and review.