



SHANNON FOYNES PORT COMPANY

HARBOUR OFFICE, FOYNES, CO. LIMERICK

PORT ENVIRONMENTAL REVIEW SYSTEM (PERS)



ENVIRONMENTAL REPORT 2020

(PERS SECTION 1.5)

Shannon Foynes Port Company

Port Environmental Review System (PERS)

Environmental Report 2020

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The Environmental Report was prepared in accordance with the EcoPort PERS Version 5, December 2016

1. INTRODUCTION

This Environmental Report has been prepared by Shannon Foynes Port Company (SFPC) to provide members of the local Community and wider public with information on the environmental issues and performance of the port operations at Foynes and Limerick.

The Report has been prepared in accordance with the requirements and guidance of the internationally recognised ECO Ports certification scheme for ports – Port Environmental Review System, PERS.

PERS has been developed specifically to address the specific environmental attributes of ports within Europe as part of an increasing recognition of the vital importance of ports and other marine terminals within the economy, together with the central role they can play in ensuring high levels of environmental performance within the transport and infrastructure sector.

Furthermore, continually developing understanding and awareness of the environmental importance of our coastal and estuarine environments, and the pressures on these important ecological habitats, has resulted in the increasing implementation of voluntary approaches to environmental management of port operations.

Shannon Foynes Port Company is a member of the "EcoPort" Network (<http://www.ecoport.com>), which is administered by the European Sea Ports Organisation (EPSO).

The EcoPort PERS has over the past 18 years been established as the only port specific Environmental Management standard and has been implemented to date by 23 ports throughout Europe.

A central requirement of PERS is the public availability of information on a ports environmental performance - this Environmental Report fulfils EcoPort requirements for reporting in a format that will be updated biennially.

The Report furthermore demonstrates the commitment of the Board, Management and Staff at Shannon Foynes Port Company to continual improvements in environmental performance in and around the ports at Foynes and Limerick through proactive environmental management of SFPC operations and encouragement of the activities of other port users.

An electronic version of the Report is available at www.sfpc.ie.

2. SHANNON FOYNES PORT COMPANY

Shannon Foynes Port Company (SFPC) (www.sfpc.ie) is the second largest Irish Port Operator handling 11.3 (2017) million tonnes of solid and liquid cargo annually through the six terminals currently operational within the Shannon Estuary. The Company is Ireland's largest bulk port company, having a 61% share of the market (IMDO Ireland Transport Economist Vol 10 (April 2013)).

The recently launched Irish National Ports Policy defines Shannon Foynes Port Company as a Port of National Significance (Tier 1).

Shannon Foynes Port Company is a Commercial Semi State Port. It has statutory jurisdiction over all marine activities on a 500km² area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The company was formed in 2000, under Statutory Instrument 283/2000, resulting from the merger of the former Shannon Estuary Ports and Foynes Port Companies; these in turn were originally formed in 1996 following the Harbour's Act of that year, which provided for the establishment of statutory port companies, free to operate independently with a strong commercial remit, while ownership was retained by the State.

There are six terminals within its jurisdiction – Tarbert (Oil) and Moneypoint (Coal) Generating Stations, RusAl Alumina Refinery (bauxite, hydrate, and chemicals), Foynes, Shannon Airport (fuel) and Limerick. In addition, Tarbert has recently undergone modifications to facilitate the storage of 140,000 tonnes of fuel oil as part of the National Strategic Reserve.

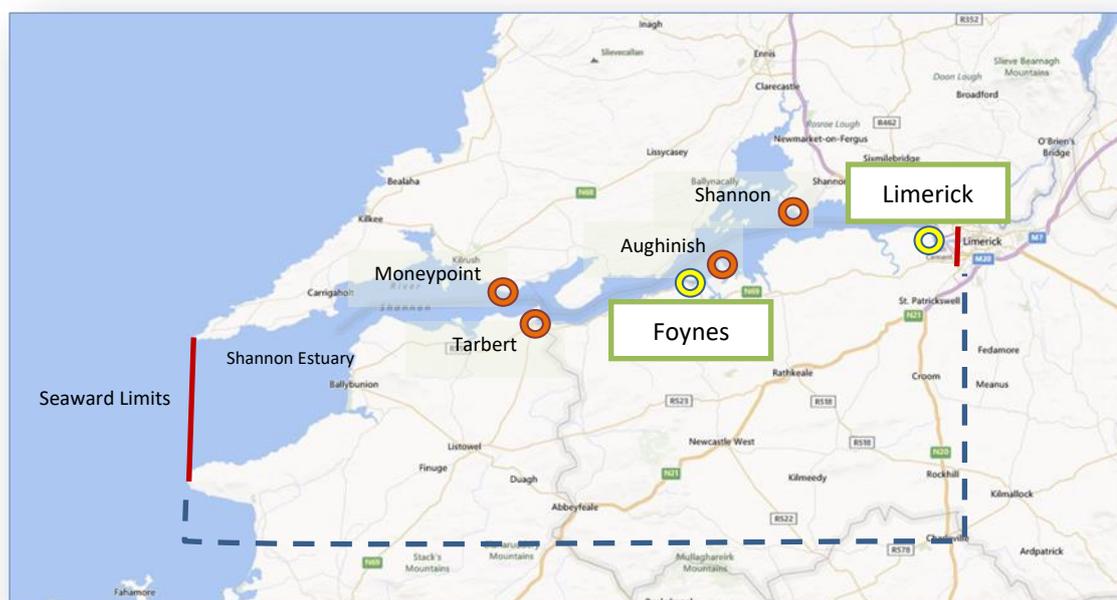


Figure 1 Shannon Foynes Port – Extent of Jurisdiction

The Company specifically manages port operations at Foynes and Limerick.

SFPC handles trade from the many sectors critical to the on-going sustainability and competitiveness of the Mid West region. This includes staple traditional heavy industrial use to modern and emerging

industries such as the energy, renewable, agricultural, tourism and manufacturing sectors. The volume of trade handled by the port in comparison to other Irish ports is summarised in Table 1.1.

Foynes Port has a long history, having first being surveyed in 1837, and is major deep-water seaport that caters for a wide variety of modes of trade including;

- dry bulk including fertilizers, animal feeds, salt, coal and alumina hydrate
- break bulk including, timber, construction materials, machinery and materials for the
- offshore industry
- liquids- primarily oils but also chemicals
- project cargoes including materials for the renewable wind energy industry
- cruise vessels

The total tonnage of cargo handled in 2019 was in the order of 1.78m tonnes.

Due to its favourable location on the west coast of Ireland and its modern deepwater facilities, Foynes Port is ideally positioned for additional European trading as well as for further increases in ocean energy resources.

Operations at Limerick docks also extend to the early 1800's - new wet docks were constructed during the 1820's to facilitate the import of timber, coal, iron and tar. Exports from Limerick included beef, pork, wheat, oats, flour and emigrants bound for North America during the Famine period.

Currently, operations at Limerick are chiefly associated with the export of cement, scrap metal, logs, glass and RDF, and with the import of animal feed and fertilizers.

The total tonnage of cargo handled in 2019 was in the order of 770,000 tonnes.

Shannon Foynes Port Company launched its Masterplan - Vision 2041 – in February of 2013 which sets out the company's commitment to investing in infrastructure. Significant projects identified in Vision 2041 to be delivered in the short to medium term include the East Jetty Infill at Foynes, completed by end of 2015, the joining of East and West Jetties starting in 2021, with subsequent additional backfill, and the reinstatement of the Limerick-Foynes rail line and new road network.

3. ACTIVITIES AT FOYNES AND LIMERICK PORTS

Activities at Foynes and Limerick Ports include the range of operations undertaken by SFPC, together with those of nonrelated third party organisations and companies who operate under lease or contract from SFPC.

Foynes is the principal deepwater general purpose terminal on the Estuary and caters for dry bulk, break bulk, liquid and project cargoes.



Figure 2 Aerial Photo of Foynes Port

Key details for Foynes are:

- Length of Jetties: West 271M; East 295M; Tanker 91 M
- Max length of vessel: 200 M (circumstances may allow greater)
- Max draught at berth: 10.5 M
- Max draught for channel from sea to berth: 7.8m + tide
- Max Beam: 32.3 M (daylight only at this beam)
- Unloading Rate: Depends on crane/material; see Cargo Handling Equipment and Storage pages for further details
- Bunker availability: By barge & truck
- Fresh Water: Yes
- Stores: Yes – no truck access to tanker jetty
- HFO Discharge: All pipes (oil & chemical) are 8 inch; rate 200 tph



Figure 3 Aerial view of Limerick Port

Limerick Port is a general purpose terminal, some 100km upstream of the mouth of the Estuary at Limerick City, catering for dry bulk, break bulk, liquid and special cargoes.

Key details for Limerick are:

- Total Quay length: 914M
- Max length of vessel: 152 M
- Max draught at berth: Tide dependent
- Max draught for channel from sea to berth: 1.2 M + tide – 0.5M
- Max Beam: 19M
- Cargo Handling: see Cargo Handling Equipment and Storage pages for further details
- Bunker availability: By road
- Fresh Water: Yes
- Stores: Yes

At both Foynes and Limerick sites, SFPC have responsibility for the loading and unloading of cargo, together with the provision of associated services including power, water, security, access control and storage.

Associated Activities

Limerick Cargo Handling

Limerick Cargo Handling (LCH), which provides a full range of logistics services, is a fully-owned subsidiary of Shannon Foynes Port Company, and is the main provider of stevedore services at Limerick Dock.

Storage & Warehousing

SFPC provides a range of storage facilities at its Limerick and Foynes facilities to facilitate traders. On-quay and near-quay open storage is available, together with a range of warehousing solutions available for short or long-term letting. Facilities include:

- 130,000 ft² of warehousing at Foynes, including 75,000 ft² of new purpose-built bulk storage
- 61,000 ft² of warehousing at Limerick Docks, including 30,000 ft² of new purpose-built bulk storage
- On-quay storage at Limerick Docks
- Substantial open storage at Foynes

Water Plant Services

SFPC makes its multi-cat vessel available for third party use.

Other Port Users

Lands at both Limerick and Foynes facilities are provided under short and long term leasehold to a range of port and cargo related activities including:

- *Fertiliser*
- *Animal Feeds*
- *Fuel Storage*
- *Marine Engineering Services*
- *Coal Storage*
- *Warehousing*
- *Construction Materials*
- *Frieght*
- *Manufacturing/Fabrication*
- *Renewable Energy (Turbine components) storage*
- *Offshore Suport Services*
- *SAR Base*

A number of these activities are carried out on sites which are Freehold, but fall within the perimeter of the SFPC Site.

The companies occupying the various sites do so under lease from SFPC, who have overall reponsibility for the site infrastucture (roads/drainage/perimeter/water supply) site security and traffic management. The individual companies however have sole responsibility for compliance with relevant environmental legislation.

For example, a number of companies operating from SFPC lands in Foynes are licensed or regulated by the Local Authority (Limerick County Council) , Environmental Protection Agency (EPA) or Health and Safety Authority under a range of measures as follows:

Limerick County Council – Licences under Section 4 of the Local Government Water Pollution Acts 1977 - 2007 to Discharge Trade Effluent or Sewage Effluent to Waters

Name	Discharge Licence Register No.
Atlantic Fuel Supply Co. Ltd	W109
CPL Fuels Ireland Ltd.	W119

Limerick County & City Councils – Waste Facility Permit

Name	Waste Permit Register No.
United Metals *	WFP-LKC-10-001-02
Clear Circle Metals*	WFP-LKC-11-001-01

** Both at Ted Russell Docks, Limerick*

Environmental Protection Agency – Waste Licence

Name	EPA Licence Register No.
Irish Bulk Liquid Storage Ltd	W0193-01
Greenport Environmental Limited	W0271-01

Environmental Protection Agency – Dumping at Sea

Name	EPA Licence Register No.
Shannon Foynes Port Company	S0009-02

Health & Safety Authority – Control of Major Accident Hazards Involving Dangerous Substances Regulations (Seveso II)

Name	Establishment Cat.
Atlantic Fuel Supply Company Ltd.	Upper
Irish Bulk Liquid Storage Ltd	Lower

4. SFPC ENVIRONMENT & ENERGY POLICY STATEMENT

SFPC EHS Policy		Environment & Energy Policy	
Doc No: EHS/093		Rev No.: 01	Page 1 of 1
Issue Date: 19.01.2021	Written by: M. Geoghegan	Approved by: P. Keating	

Shannon Foynes Port Company (SFPC) is the Port Authority with Statutory responsibility for commercial maritime activities within the limits defined in the Harbours Acts and associated amendments.

It is the policy of this company to implement and maintain, in so far as is reasonably practicable, systems and procedures to prevent or reduce maritime activities and actions that pose a threat or have a negative impact on the natural environment.

SFPC will;

- Develop and implement an integrated Management System which incorporates environmental & energy management that is appropriate to the nature, scale and impacts of our activities or services and in accordance with associated certification standards.
- Comply with statutory, non-statutory and best practice obligations as assigned by legislation, shareholder and industry best practice, in so far as is reasonably practicable
- Consult with employees, tenants, contractors and other interested parties on environmental & energy related matters and encourage participation in management programs and promoting a positive culture within the scope of SFPC responsibilities.
- Support the SFPC Energy Performance Officer (EPO) who will, in so far as is reasonably practicable, maintain Energy Management objectives agreed by Management and report directly to the CEO.
- Work to prevent environmental accidents and maintain a high level of preparedness to reduce the effects of accidents or incidents that occur.
- Evaluate and regularly review, environmental risks associated with the company's activities, documenting programs to eliminate or reduce, in so far as is reasonably practicable, any risks identified.
- In so far as is reasonable, purchase energy efficient products and services and design for energy performance improvement.
- Promote continual improvement through an ongoing program of monitoring and measurement and where required establish objectives and targets designed to promote improvement and efficient energy utilisation to reach national climate action and public sector energy efficiency targets.
- Support the provision of necessary resources to ensure the environment and energy policy is realised.
- Review this environmental & energy policy on a regular basis and/or where the business changes in nature, scale or size.
- Make available to stakeholders and the general public the PERs environmental report demonstrating sustainable development and environmental protection measures adopted by SFPC.

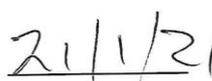
Copies of this Policy are made available at company locations and available to interested parties upon request.

The allocation of duties for environment & energy matters and particular arrangements to implement this policy are set out in the SFPC Integrated Management System Manual.

Responsibility for implementation and communication of the environment & energy policy and associated documentation lies with the Chief Executive Officer, the Board of Directors and Management team general, who will, in so far as is reasonably practicable, ensure the objectives of this policy are achieved.



Pat Keating
Chief Executive Officer



Date

5. ENVIRONMENTAL MANAGEMENT AT SFPC

Shannon Foynes Port Company has adopted a structured approach to management of its activities and operations throughout the Estuary.

SFPC has elected to use a formal system in order to facilitate the management and development of the company. This system is based on an integrated model and as a guiding principle the understanding and delivery of its Customer and/or interested parties' requirements is key to attaining its short and long-term objectives. Current standards include:

- ISO 9001:2018
- ISO 45001:2018
- Port Environmental Management System (PERS)

In consultation with our external certification support SFPC are also committed to a suitable management or change program to meet the requirements of ISO 9001:2018.

The core values of the Integrated Management System revolve around risk management. The management system is designed to meet the risk appetite of the company which is defined in the Board approved Risk Management Policy.

The management system is also established in line with the requirements of ISO 9001:2018 & ISO 45001:2018. SFPC are also committed to a suitable management or change plan to meet the requirements of ISO 9001:2018

The system is structured in three main tiers:

- Tier one: Organisational Policy & IMS manual
- Tier two: Procedures, Flowcharts
- Tier three: Forms and other supporting documents.

Within the overall management framework of the Company, environmental considerations are incorporated within day to day operations through procedural controls (SOP's) and through a structured assessment of the environmental risks.

These risks are ranked and provide a framework for monitoring and management of activities so as to reduce the level of risk. Comprehensive monitoring programmes are in place for key environmental parameters, including noise, dust and water.

This approach currently forms the basis for the implementation of PERS within Shannon Foynes Port Company.

Significantly, the management of activities and operations within Shannon Foynes Port Company takes places within the overall context of a Corporate Social Responsibility (CSR) Policy, which is approved at Board level.

The Policy sets out the key management areas for the Company, in terms of CSR, as:

- *Health & Safety*
- *Environment*
- *Community*
- *Marketplace*
- *Workplace*

Specifically, the CSR Policy provides over reaching policy objectives for environment in terms of:

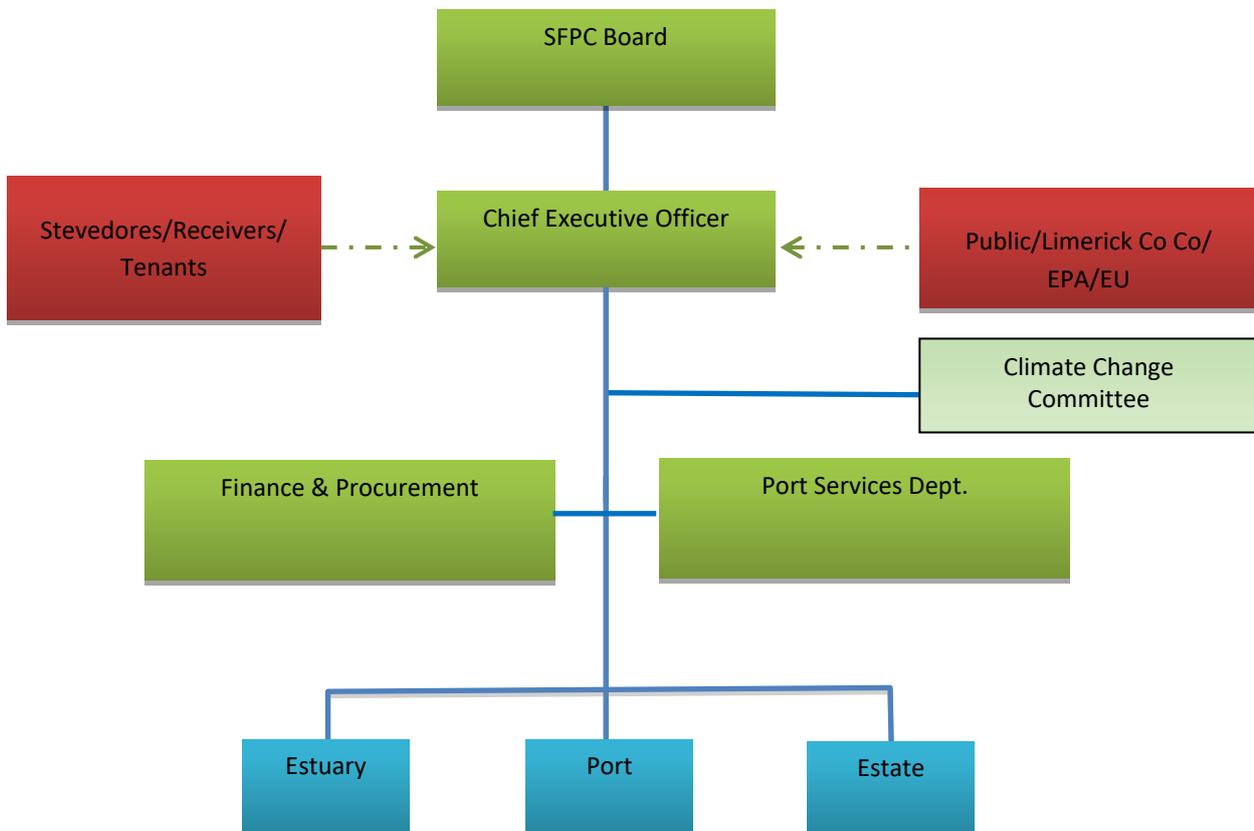
- *Commitment to environmentally responsible actions in energy efficiency, conservation, risk management, emergency planning and responsible waste management*
- *Encourage wide consultation, dialogue and cooperation between port users and stakeholders to facilitate sustainable economic development*
- *Embracing new technologies and management systems to assess and minimise the company’s ‘Carbon Footprint’*
- *Implementation of effective management systems (PERS) as a key component of business to drive continual improvement in environmental performance*

Related objectives under the CSR Policy address Community and Neighbour relationships.

Environmental Management Structure and Responsibilities

The overall organisational structure having regard to environmental issues is shown below:

SFPC Environmental Organisation Chart



Key Environmental Responsibilities at SFPC

Functions	Job Title or Name	Department
Port Operations (Dredging)	John Carlton	Port Services
Port Operations (Navigation)	Hugh Conlon	Port Services
Port Operations (Shipping)	Hugh Conlon	Port Services
Port Operations (Terminals)	John Carlton	Port Services
Cargo Handling Operations	John Carlton	Port Services
Jetty/Wharf Management	John Carlton	Port Services
Site Management	John Carlton	Port Services
Strategic Planning	Pat Keating	CEO
Supplies acquisition	Alma Moran	Port Services
Licensing/Permits/Third Party Liaison	John Carlton	Port Services
Quality Management	Martin Geoghegan	Compliance Officer
On site Contractor Management	John Carlton	Port Services
Emergency Planning	Hugh Conlon	Port Services
Waste Management	John Carlton/Hugh Conlon	Port Services
Marina / Slipway management	John Carlton / Hugh Conlon	Port Services
Environmental Document Management	Hugh Conlon / Aiofe Lenihan	Port Services
Environmental Data Management	Aoife Lenihan	Port Services
Soil pollution assessment	John Carlton	Port Services
Air Quality monitoring	Hugh Conlon	Port Services
Water Quality monitoring	Tom Treacy	Port Services
Energy and Carbon Footprint monitoring	John Carlton	Port Services
Noise management	John Carlton/Hugh Conlon	Port Services
Vehicular Management of Terminal traffic/Security	John Carlton / Hugh Conlon	Port Services
Port Construction/ Development	John Carlton	Port Services
Environmental Monitoring	Hugh Conlon	Port Services
Ecological Designations (SAC)	John Carlton	Port Services
Environmental Training	John Carlton	Port Services
Climate Change Management	Climate Change Committee	All Departments.

Identification of relevant stakeholders including identification of their needs and expectations, engagement of stakeholders with the environmental port activities

Interested Parties Register

Interested Parties

The need for organisations to understand the needs and expectations of interested parties is a mandatory requirement of ISO 9001:2018 and future standards. The standard defines interested parties as a "person or organisation that can affect, be affected by, or perceive itself to be affected by a decision or activity"

Understanding the needs and expectations of interested parties:

Due to their effect or potential effect on the organisation's ability to consistently provide services that meet customer and applicable statutory and regulatory requirements, the organization shall determine:

- a) The interested parties that are relevant to the quality management system;
- b) The requirements of these interested parties that are relevant to the quality management system. The organization shall monitor and review information about these interested parties and their relevant requirements.

The Purpose of this Register

This register will be used to capture and record relevant interested parties associated with SFPC and its operational activities. The register should determine:

- a) The external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended result(s) of its quality management system
- b) Needs and expectations of interested parties.

The register is not intended to capture all interested parties rather just "key" external and internal influencers that could affect its ability to achieve the intended result(s) of the integrated management system. For the purpose of this register the intended result(s) of the IMS is aligned with the scope of services certified under current IMS certification and defined as: "anything that can prevent the organisation from achieving its objectives to provide a safe haven for shipping in the Shannon Estuary by traffic management within the port limits, the maintenance and development of terminal and shore-site facilities and the operation of cargo handling and logistics services".

Power & Interest of Interested Parties

The below table should be used to determine the significance of the interested party registered.

		Level of Interest	
		Low	High
Power	Low	A. Minimal Effort	B. Keep Informed
	High	C. Keep Satisfied	D. Key Player

Relevant Interested Parties

Interested party	Origin		Detail of Requirement	Legislative		How is requirement met	Significance	Monitoring / Measurement	Frequency
	Int	Ext		Yes	No				
Europe / European Government		✓	Comply with European & State requirements	✓		Representation at European Level Regular attendance at European meetings	B / C	Representation at European Level Regular attendance at European meetings	Periodic
European Transport Network		✓	Comply with European & State requirements	✓		Representation at European Level Regular attendance at European meetings	D	Representation at European Level Regular attendance at European meetings	Regular
Department of Transport		✓	Comply with State requirements	✓		Representation at State Level Regular Department Communications	D	Board meeting minutes Subject to internal/risk audit	Regular / Periodic
Other Government Departments & Agencies		✓	Comply with State requirements	✓		Regular Communications	B / C	Board meeting minutes Subject to internal/risk audit	Regular / Periodic
Board of Directors	✓		Required as part of Companies Act and COP for State Bodies	✓		Board members appointed Terms of Reference approved Report at Board Meetings	D	Board meeting minutes Subject to internal/risk audit	Regular / Periodic
Board Appointed Committees	✓		Required as part of COP for State Bodies	✓		Committee members appointed Terms of Reference Committee meetings	D	Committee meeting minutes Subject to internal/risk audit	Regular / Periodic
Internal & External Auditors		✓	Required as part of Companies Act and COP for State Bodies		✓	Audit plans Audit report / findings Audit & Risk committee meetings	D	Audit plans approved Audit & Risk committee meeting minutes Subject to internal/risk audit	Regular / Periodic
Insurance Brokers & Underwriters		✓	Insurance liability interest		✓	Annual insurance review Annual cover	B / C	Annual insurance review Annual cover	Annual

Local / Regional Communities and/or Community Representative Organisations			Corporate & Social Responsibility	✓		Regular Communications	B / C	Representation at Local/Regional Level	Regular
SSI Service		✓	EU-wide protocol to monitor and exchange information about maritime traffic within EU territorial waters.	✓		Regulated through Marine Operations	A	Monitored daily by Marine Operations	Daily/ Weekly
Shipping Companies		✓	Requirement to regulate commercial shipping within port limits	✓		Regulated through Agents & Marine Operations	A	Monitored daily by Marine Operations	Daily/ Weekly
Marine Surveyors Office		✓	Regulates the safety, security, pollution prevention, living and working conditions of all Irish ships and crews and foreign flagged ships and crews in Irish ports.	✓		Coordinated through Marine Operations	B / C	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	Daily/ Weekly
Commissioners of Irish Lights		✓	Provide marine aids to navigation (AtoN) under the Safety of Life at Sea (SOLAS) convention.		✓	Regulated through Marine Operations	B / C	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Pilots & Pilot Boat Operations		✓	Requirement to pilot ships entering port limits	✓		Regulated through Marine Operations / CARGO PRO	D	Monitored daily/weekly by Marine Operations Subject to internal/risk audit	Daily/ Weekly / Periodic
Tug Boat Services		✓	Requirement to use tugs on some vessels entering port limits	✓		Regulated through Marine Operations / CARGO PRO	D	Monitored daily/weekly by Marine Operations Subject to internal/risk audit	Daily/ Weekly / Periodic
Agents		✓	Regulate agent activity within port limits	✓		Regulated through Marine Operations	B / C	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Stevedores	✓	✓	Regulate stevedore activity within port limits	✓		Regulated through Marine Operations & Agents	B / C	Monitored daily/weekly by Marine Operations Subject to internal/risk audit (TRD)	Daily/ Weekly / Periodic

Port Security	✓		Comply with ISPS security code	✓		Security plans in operation	B / C	Monitored daily/weekly by Marine Operations Subject to internal/risk audit (TRD)	Daily/ Weekly / Periodic
Shannon Ferry Group Ltd		✓	Regular ferry crossing between		✓	Regulated through Marine Operations	B / C	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Foynes Yacht Club		✓	Recreational activities on the water		✓	Regulated through Marine Operations	B / C	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Rusal / Aughinish		✓	Key customer importing and exporting materials		✓	Regulated through Marine Operations & Agents	D	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	Daily/ Weekly
ESB Tarbert / Moneypoint		✓	Key customer importing and exporting materials		✓	Regulated through Marine Operations & Agents	D	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	Daily/ Weekly
Shannon Airport		✓	Key customer importing aviation fuel		✓	Regulated through Marine Operations & Agents	D	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	Daily/ Weekly
Irish Navy		✓	Statutory maritime component of the Defence Forces of Ireland and may on occasion need to use port facilities		✓	Regulated through Marine Operations	C	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	
Ship Owners / Captain		✓	Key customer importing and exporting materials		✓	Regulated through Marine Operations & Agents	D	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Other Customers		✓	Customers importing and exporting materials		✓	Regulated through Marine Operations & Agents	D	Monitored daily/weekly by Marine Operations	Daily/ Weekly
St Michaels Rowing Club		✓	Recreational activities on the Shannon		✓	Regulated through Marine Operations	B/C	Monitored daily/weekly by Marine Operations	Daily/ Weekly

Irish Coast Guard		✓	Statutory maritime component and emergency service provider. May on occasion need to assist or use port facilities	✓	Regulated through Marine Operations	D	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	As required
Work boats (assist lines and safety)		✓		✓	Regulated through Marine Operations & Agents	D	Monitored daily/weekly by Marine Operations	Daily/Weekly
County councils		✓	Regulate and engage in flood prevention and shoreline emergency activities	✓	Regulated through Marine Operations	B/C	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	Daily/Weekly
Customs & Excise (Revenue)		✓	Statutory body who monitor import and export activities in the port	✓	Regulated through Marine Operations	D	Monitored daily/weekly by Marine Operations	Daily/Weekly
Garda		✓	Statutory role during the discharge of certain cargos	✓	Regulated through Marine Operations	B/C	Monitored daily/weekly by Marine Operations	As required
Annual events (Glin swim, regattas etc.)		✓	Recreational activities on the Shannon	✓	Regulated through Marine Operations	C	Regular contact with HM/Marine Operations and activities coordinated through Marine Operations.	As required / Annual
Kilrush Marina		✓	Recreational activities on the Shannon and on occasion may need to moor pilot boat	✓	Regulated through Marine Operations	B/C	Regular contact with HM/Marine Operations	As required
Maintenance Dredging Services		✓	Maintain advertised depths	✓	Regulated through Port Services / CMMS	D	Monitored by CMMS Subject to internal/risk audit	Daily/Weekly / Periodic
Sounding / Ploughing Services	✓		Maintain advertised depths	✓	Regulated through Port Services / CMMS	D	Monitored by CMMS Subject to internal/risk audit	Daily/Weekly / Periodic
Port Side Infrastructure Support Services i.e. berths, pontoons etc.	✓		Maintain and provide port side infrastructure	✓	Regulated through Port Services / CMMS	B / C	Monitored by CMMS Subject to internal/risk audit	Daily/Weekly / Periodic
Plant & Equipment Support Services	✓		Maintain plant & equipment in good order	✓	Regulated through Port Services / CMMS	B / C	Monitored by CMMS Subject to internal/risk audit	Daily/Weekly / Periodic

Local Authorities / Other local government agencies	✓		Comply with requirements i.e. permits, licences etc	✓		Regulated through Port Services	B / C	Monitored by PSD	Daily/ Weekly
Agents		✓	Regulate agent activity within port limits	✓		Regulated through Marine Operations	B / C	Monitored daily/weekly by Marine Operations	Daily/ Weekly
Stevedores	✓	✓	Regulate stevedore activity within port limits	✓		Regulated through Marine Operations & Agents	B / C	Monitored daily/weekly by Marine Operations Subject to internal/risk audit (TRD)	Daily/ Weekly / Periodic
Port Users	✓		Regulate port users using port facilities	✓		Contracts, letting / lease agreements, licences	B / C	Monitored daily/weekly by Management Subject to internal/risk audit (TRD)	Daily/ Weekly / Periodic

6. ENVIRONMENTAL PERFORMANCE AT FOYNES & LIMERICK PORTS

The Environmental Performance of the Company at Foynes and Limerick Ports is described in the following sections. The overall evaluation of performance is made based on an identification of the relevant Environmental Aspects, and assessment of their Significance.

Process for Identification & Evaluation of Environmental Aspects

SFPC has a well-developed and structured approach to the management of its activities and operations. Risk Management is a fundamental component of the approach taken by SFPC to the management of all aspects of the business – from financial and commercial through engineering, human resources, quality, safety and environment.

Aspects are identified by a combination of developed processes including: Internal & external audits, Compliance and risks evaluations, EHS meetings and workshops, Accident/incident/Near Miss investigations, general communications (management, employees, port users, public).

Once identified, aspects (risks) are evaluated in a structured manner. SFPC use a consistent approach to risk assessment across the business units and it is this approach that has been used for assessment of Environmental Aspects.

The Assessment Method follows a 5 x 5 rating system using Likelihood (Probability of Occurrence) and Severity Criteria.

The Environmental Risk rating is illustrated on the risk matrix below and is processed using the SFPC RAMP – Risk Assessment Management Program (a software database).

SFPC Risk Rating Matrix

		IMPACT				
		1 Minor	2 Appreciable	3 Major	4 Severe	5 Catastrophic
LIKELIHOOD	1 RARE: Potential for occurrence in exceptional circumstances	Very Low	Very Low	Low	Low	Medium
	2 UNLIKELY: Unlikely, but potential for occurrence is reasonable	Very Low	Low	Medium	Medium	High
	3 POSSIBLE: Has occurred at least once (within 5 years)	Low	Medium	Medium	High	High
	4 LIKELY: Has occurred at least once (within 3 years)	Low	Medium	High	Very High	Very High
	5 ALMOST CERTAIN: Occurs on a frequent basis (several times annually)	Medium	High	High	Very High	Very High

To ensure consistency across the organisation, the Company's Environmental Aspects have been evaluated using this approach, the output of the evaluation being a ranking as to the significance of all environmental aspects.

The Environmental Aspects identified as relevant to the activities at SFPC are tabulated below.

List of Environmental Aspects at SFPC

Tag	Environmental Aspect
A	Air Emissions – Particulates
B	Air Emissions – VOC's
C	Aqueous Discharge / Surface Water
D	Chemical Use
E	Contracted Services
F	Water Use
G	Hazardous Waste – Liquid
H	Hazardous Waste – Solid
I	Noise & Vibration
J	Disposal of Solid Non-Hazardous Waste to Landfill
K	Past Activities
L	Recycling
M	Transport
N	Visual Impact
O	Emergencies
P	Soil/Sediments
Q	Ecosystems - Marine
R	Ecosystems - Terrestrial
S	Construction Activities
T	Maintenance Activities
U	Energy

Scope

Only those Aspects within the direct control of SFPC have been considered for the continuing development of the PERS system. The functional areas and activities considered for Foynes and Limerick are:

1. Estuary
2. Port (including berths)
3. Estate
4. Projects
5. Emergencies

The Aspects are further described and evaluated in the Register of Environmental Aspects (Attachment 1).

A summary of environmental performance at Foynes and Limerick sites include:

Relationship with local community. (EPI4)

It is a key objective of Shannon Foynes Port Company's 30 Year Plan "Vision 2041" and a policy imperative for SFPC that the development and operation of the Ports must benefit the wider community and in particular those living in the town of Foynes and Limerick City. Societal integration of the Port of Foynes and Limerick Docks is seen as an integral part of the corporate social responsibility (CSR) of SFPC. SFPC using the COMPASS initiative sets to achieve part of this in addition to dealing with any issues that arise from port activity .

Number of complaints from community.

Interested Party	Ref	Date Received	Issue	Issued to
Foynes Resident	CM102	03/02/2020	Dangerous overtaking manoeuvre within the village	Engineering & Port Services Manager
Limerick Resident	CM105	30/07/2020	Late night / early morning noise levels coming from Limerick Docks	Engineering & Port Services Manager
Limerick Resident	CM106	30/07/2020	I have been directed by the Limerick Dept. of Environment to register my complaint about the noise emanating from Limerick Docks	Engineering & Port Services Manager
Limerick Resident	CM108	18/09/2020	noise pollution coming from Limerick Dock	Engineering & Port Services Manager
Foynes Resident	CM109	18/09/2020	Dust Complaint - coal dust from the CPL yard	Engineering & Port Services Manager
Limerick County Council	CM110	24/11/2020	Dust Complaint Limerick Docks.- Paul O'Grady Limerick City & County Council forwarded email to Harbour Master following a phone call on 23/11/2020	Engineering & Port Services Manager
Limerick resident	CM111	05/12/2020	Noise pollution from the port happening outside noise pollution hours.	Engineering & Port Services Manager

All issues were recorded and closed with report back to interested party.

Air Quality

The Company has placed six dust monitors around the Foynes facility and have installed three monitors at the Limerick site.

Dust monitoring is by Bergerhoff type gauges for evaluation of dust deposition on a monthly basis in accordance with Standard Method VDI2119 (Measurement of Dustfall, Determination of Dustfall using Bergerhoff Instrument (Standard Method) (German Engineering Institute) by an external contractor.

Although there are no statutory limits for dust deposition applicable to SFPC, in Ireland guidance on dust deposition defines nuisance levels dust at 350 mg/m²/d.

Monthly data is recorded, trended and included as a major KPI in the SFPC ISO 9001 QMS.

Where elevated levels of dust deposition arise, SFPC investigates to determine the cause and recommend corrective actions, if relevant.

This measurement system was introduced to measure and retain information in the event of complaints from stakeholders or neighbours.

Generally, levels of dust deposition are well below the levels which would give rise to nuisance (and complaints). This is due largely to work undertaken by SFPC on restricting the generation of fugitive dust emissions, by restricting operations at certain berths during certain wind conditions (Ref: [ESOP001 - Control of Dust Emissions from bulk cargo operations](#)).

SFPC commissioned OES in late 2015 to complete an analysis of all cargoes handled at Foynes and Limerick with regard to their individual characteristics and effect of the environment and health. Health data sheets (MSDS) were taken for all cargoes loaded and discharged at the Foynes site and each cargo sampled for test purposes. This report is now available.

Noise

Although there are no statutory emission limits applied to SFPC in respect of noise, the company operates a policy of testing all plant equipment noise sources (cargo handling equipment) annually to ascertain the sound power level of each piece of machinery.

This work is carried out by the Port Services who keeps, on file, a record of each result. In this way we can track whether machines are producing noise profiles which deteriorate on an on-going basis or otherwise – in which case remedial work can be carried out.

Noise measurements at various locations at both ports are compared against typical Planning and Environmental Standards applied in Ireland, as follows:

Daytime	55dBA L _{A90}
Night-time	45dBA L _{A90}

Generally, noise levels during day time periods within the port itself (at the jetties) are within the range 35 – 49dBA during daytime periods, and 32 – 49dBA night time. Attenuation due to distance and other local screening has the effect of reducing these levels significantly at the Port perimeter and beyond.

Observations made during measurements have noted the contribution from road traffic along the N69 during all measurement periods.

OES Consulting (OES) was commissioned by Shannon Foynes Port Company (SFPC) to undertake a baseline environmental noise survey and prepare a noise management plan for port activities at Foynes, Co. Limerick. This has been completed in 2018 with the following noted;

Survey Summary Findings

Overall, port related noise recorded at NSLs during the survey complied with the EPA limit values.

Recommendations

Noise

Hearing protection should be selected on the basis that daily exposure is reduced to below 85 dB based on an 8-hour shift.

However, based on the monitoring completed, observation of tasks, the variability of work undertaken and the potential for uncertainty encountered, it is recommended that hearing protection be worn as mandatory during the operations identified as above the LAV also and for areas where SFPC employees are likely to be exposed.

These activities/areas for Limerick, Kilrush and Foynes based on the 2018 survey are listed as follows:

1. Inside engine rooms of all cranes and boats;
2. Mitsubishi forklift operators;
3. Ground workers unslinging and tallying;
4. Operating Sumitomo crane;
5. Operating excavators in feed warehouse;
6. Hopper washing;
7. Working in the ship hold sweeping up fertiliser and operating bobcat.

Peltor Optime I ear muffs or similar will be sufficient for most activities with the exception of the engine rooms where Peltor Optime III are recommended overall. Specialist ear muffs can be provided where communication is an important consideration.

It is recommended that the requirements of the legislation set out in Table 1 for areas/activities where the LAV, UAV and ELV values are exceeded are reviewed internally.

The following specific measures are recommended:

No employees were observed wearing hearing PPE. Ensure employees are aware of the risks to hearing and wear the PPE provided. Conduct refresher training if not already completed.

The method of loading rods directly onto trucks observed in Foynes could be considered for the Limerick Docks to reduce noise levels and the use of forklifts during this activity.

Service all equipment regularly and consider units with low noise ratings when replacing.

Dampen metal hatches on hoppers to prevent peak levels above 140 dB(C) during power washing.

Activities such as cement unloading were not assessed during the current survey. It is recommended that the measures set out in the 2015 report with regards to activities not assessed in 2018 should be implemented if not already completed.

Vibration

The daily exposure whole body vibration action value set out in the General Application Regulations 2007 was exceeded for the operation of the Mitsubishi forklift.

It is possible that false peaks/vibration occurred during the measurement however, it is recommended that a precautionary approach be taken by reviewing the seating/anti-vibration mounts in the Mitsubishi units and replace where necessary. Additionally, potential exposure can be reduced by alternating staff between duties. As set out in Section 5.1, unslinging of metal can be done directly onto HGVs rather than with the use of forklifts.

It is recommended that the cabin seat in the Sumitomo be replaced/reconditioned as it is worn. The LH60 cabin could also be reviewed for potential upgrades.

As set out in the 2011 OES report the following general measures apply:

SFPC is required to comply with the duty to reduce exposure to mechanical vibration and attendant risks to a minimum by establishing and implementing a programme of technical or organizational measures, or both, appropriate to the activity and consistent with the risk assessment.

In particular, the following should be taken into account:

- a. Other methods of work which reduce exposure to mechanical vibration;
- b. The choice of work equipment of appropriate ergonomic design which, taking account of the work to be done, produces the least possible vibration;
- c. The provision of auxiliary equipment which reduces the risk of injuries caused by vibration, such as seats that effectively reduce whole-body vibration and handles which reduce the vibration transmitted to the hand-arm system;
- d. Appropriate maintenance programmes for work equipment, the places of work, workstations and systems of work,
- e. The design and layout of places of work and workstations;
- f. Adequate information and training to instruct employees to use work equipment correctly, safely and without risk to health in order to reduce their exposure to mechanical vibration to a minimum;
- Limitation of the duration and intensity of exposure to mechanical vibration;
- h. Appropriate work schedules with adequate rest periods, and,
- i. Provision of clothing to protect workers from exposure to cold and damp.

It is further recommended to conduct additional whole-body vibration monitoring on a more regular basis and also during different handling activities not assessed during the current survey.

Proposed measures listed in this report will ensure continuously improving environmental performance and compliance with EcoPorts criteria.

Water Quality

Discharges to surface waters from the jetties and shore side operations at Limerick and Foynes are due to rainfall - there are no discharges of trade effluent associated with the port activities.

Surface water runoff during rainfall events runs directly from the surface of piers and jetties in to the River Shannon. In the case of Foynes, runoff from the yard and estate areas is collected in a network of surface water drains, and conveyed to a point where it is discharged to the Shannon Estuary.

The River Shannon Estuary is classified as a transitional water body and is subject to a series of quality standards and classification based on the requirements of the EU Water Framework Directive, which is implemented in Ireland by the European Communities Environmental Objectives (SURFACE WATERS) Regulations 2009 – 2012.

Discharges of surface water runoff are not currently subject to Licensing in Ireland and, as the waste is taken to be clean runoff, no limits are required.

SFPC has a responsibility however to ensure that no potentially polluting substances enter the River Shannon from its facilities. Runoff from jetties is managed by ensuring that the potential for cargo spillages onto the jetty deck is minimised through good handling practice, together with good housekeeping and cleaning practices to ensure that minor spills for hoppers or grabs are swept up.

The requirement to collect and properly dispose of cargo residues on the jetties is the responsibility of both the ship and the Stevedores/Cargo Receivers. SFPC then clean and leave the berth in a clean condition so as to minimise the potential for cargo residue to become entrained in surface water runoff to the Estuary (Ref EHS 024 Waste Management Plan 2018).

In the context of shore based areas, SFPC have developed a plan for the upgrade of the drainage system by retrofitting interceptors on all discharges into the River Shannon within its control to ensure no polluted surface water enters into a water body. SFPC are upgrading all of our port roads with a biennial surface water drainage system to endeavour to achieve compliance with the relevant legislation, this includes all surface road run off directed through interceptors prior to discharging into a water body. Phase 1 and the East Jetty has been completed and Phase 2 is about to commence.

The Company has also written to all tenants and freehold property owners within SFPC estates, requesting that they demonstrate adequate levels of control of potentially polluting substances (such as oils and other chemicals) within their operations.

All future developments within SFPC facilities will be required to have current loss control and containment systems included at design stage, with the objective of preventing pollution entering the River Shannon.

The Potable water gets analysed on an annual basis and last test was completed in April 2018 and results were satisfactory and within EU regulation.

Waste Management

SFPC have prepared a comprehensive Waste Management Plan (WMP), which was most recently approved in April 2017.

The new Plan, now developed with a waste contractor in 2020, includes the use of compactors rather than skips for ship landed waste, category 1 material. This has reduced the requirement for weekly collection and is now on as need basis, normally a collection every 6 to 8 weeks thereby reducing the environmental impact and use of landfill.

In addition, as part of the new contract SFPC have developed an SOP, approved by Department of Agriculture for the management of Category 1 ship landed waste, and now part of the Waste Management Plan.

SFPC with the Department of Agriculture have completed workshops with DOA Officials, port employees and Ships agents on the management of ships waste during 2015.

The WMP was designed primarily to cater for all ship waste has been expanded to encompass all waste generated, as follows:

Waste Type	Sub Category	Description
Ships Waste	General	Includes packaging, bottles, cartons, wood, paper, and many other items and generally the largest component of waste. Reception facilities for this will be a skip on the shore, accessible to all vessels.
	Swill	<p>Generally defined as wastes containing material of animal or poultry origin, and food waste. The Department of Agriculture has granted the contractor a licence to remove and dump swill. The Harbour has responsibility to provide through its contractor, adequate reception and storage facilities.</p> <p>The removal, conveyance and safe disposal of swill will be subject to control by an authorised officer of the Department of Agriculture, food and forestry (DAFF) (Port Veterinary Supervisor).</p>
	Hazardous	<p>Includes all types of oils, oil contaminated materials (rags etc.), paint containers, other hazardous chemicals used on board.</p> <p>Designated wheelie bins are provided for solid hazardous waste – oil tanks for liquid residues.</p>
Port Waste		<p>Includes all non- ship generated waste, and does not include waste generated by companies operating within the port area, who will provide for their own waste disposal.</p> <p>Storage is provided for the collection and disposal of Port waste at Limerick and Foynes. In addition an additional 12 cubic yard skip will be supplied at Foynes for the reception of road sweepings. Other installations will provide their own facilities for the disposal of port waste.</p> <p>The areas for Port waste collection will be remote from Ship waste compactors and clearly marked. As with ship waste the Port waste will be segregated into general and hazardous waste and disposed of accordingly.</p> <p>As with ship waste receipts for the collection and disposal will have to be logged and recorded for inspection. The contractor for ship's waste will also have responsibility for the port waste disposal.</p>
Cargo Waste		<p>The ship and the Stevedores/Cargo Receivers are responsible for the collection, storage and proposer disposal of waste accumulated from the load/discharge of cargo.</p> <p>It is expected that the Stevedore/Receiver will, as soon as possible after completion of cargo, dispose of any cargo residues remaining on the berth. SFPC will then clean and leave the berth in a clean condition for the next vessel.</p>
Asbestos Waste		The potential for asbestos waste arises from the presence of asbestos containing material (ACM) in cladding and sheeting on warehouse and shed structures within the port. The SFPC Waste Management Plan has been updated for 2014 to take account of the presence of ACM in undertaking construction or repair works at SFPC and makes provision for its safe handling, storage and disposal.

SFPC maintain detailed records of all wastes removed from site. These records, with the help of Waste Management Contractors include the identification of recycled waste from January 2016, in order to set and achieve targets going forward.

Conservation

The Lower River Shannon is an area of high ecological value and conservation interest and is designated a Special Area of Conservation (SAC) and a Special Protection Area (SPA) for Birds – both Natura 2000 sites.

SFPC operations therefor take place both within and adjacent to sensitive and important habitats and species of mammal and bird.

Through effective control of activities at both Limerick and Foynes, the potential for impact on the flora and fauna of the area is significantly reduced. Developments proposed by SFPC will be subject to Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), which will assess the wider potential for impact on designated Natura 2000 sites.

The Vision 2041 Masterplan has been subjected to Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (HAD) which will ensure that the relevant environmental aspects are taken to more detailed consideration at future planning stages.

Oil Pollution Control

The Company philosophy on this issue has always been to amalgamate all those companies on the Estuary who have a duty to provide a response, into one cohesive unit such that there is adequate equipment and personnel available.

This ensures that the equipment available is extensive in nature instead of every organization having the minimum required which in the event of an incident would be of little or no value.

The entity formed is called “Shannon Estuary anti-Pollution Team” (SEA-PT) and details of it are to be found on the company web site at www.sfpc.ie.

The members of the team include four local Authorities, Port Company, three oil companies, and three external companies. Each member contributes to maintain the equipment in hand, provide training courses and purchase new equipment.

Shannon Foynes Port Company and all members of SEAPT have completed oil pollution response exercises during 2019 and 2020.

The 2020 Annual Shannon Estuary Anti-Pollution Team (SEAPT) exercise took place in December as outlined below;

Exercise Shannon Resolve

Date: Thursday 10th December 2020

Time: 09.45 – 13.00

Location: Clayton Hotel and remote access via Zoom

The exercise commences on Day Two of an on-going incident in the lower reaches of the Shannon Estuary. In poor weather, a vessel carrying hydrocarbons into Shannon Foynes Port has grounded due to engine failure and attempts to re-float the vessels have failed. On the morning of Incident Day 2 as the weather deteriorates further, the vessel becomes structurally unsound and the Shannon Estuary Pollution Plan is activated and SEAPT mobilised.

Objectives:

Mobilise SEAPT

Ensure all members are suitably acquainted with the requirements of the National Contingency Plan for Oil and HNS Spills published in June 2020

Test the ability of SEAPT members to work remotely with a central Command Centre using on-line conferencing facilities.

Test the ability of SEAPT to create an effective Incident Action Plan for the given scenario

Execution:

The exercise directing team will operate from the Clayton Hotel following full Covid 19 safe precautions. A limited number of additional SEAPT members will also operate from this location, sufficient to form a core IMT. All other participants will engage remotely utilising the Zoom platform*. A link will be sent for this. The exercise will proceed using whole group and break-out sessions in order to simulate the work of various incident command team sections.

*The Zoom platform is being used to ensure that all participants will be able to access the exercise online and give the exercise directing staff (meeting host) full control of the meeting, breakout rooms and access. Experience has shown that our various member organisations utilise different on-line portals with varying levels of access authority. This is further complicated by personnel using different devices.

Key Deliverables:

The key deliverable for this exercise is to understand the issues surrounding remote working of an incident and agree a path forward for future Remote Incident Management Interface.

Agenda for 10th December:

09.45 – log-on and register

10.00 introduction

1015. Operations Briefing – SFPC Incident Commander

10.30 IMT set up and activities as per IC Objectives

12.30 End Ex and Debrief

13.00 Close

Dredging

In Ireland there is a very strict licensing regime for dredging which ensures that operations are undertaken in compliance with all the legislative requirements - both National and EU.

The Licensing process has since 2010 fallen under the control of the Environmental Protection Agency (EPA), who are the Statutory Body responsible for issuing consent for dredging operations.

The EPA has granted a 6 year licence (from Dec 2020) to SFPC to undertake maintenance dredging and dispose of dredged material. Maintenance dredging, by ploughing, is also permitted under the EPA Licence S0009.

Conditions of the dredging licence to which SFPC comply include:

- Accommodating a Dolphin Watch (Marine Mammal Observer (MMO))
- Limits on the amount of spoil to be dredged and dumped
- Defining the exact area of the dumpsite
- Defining the time of year at which dredging may take place

A successful Capital dredging programme was completed in June 2018 in Foynes with no adverse findings, complying with all necessary licences and procedures. This included the tendering of the contract, ensuring that the dredging vessel complied with all requirements and records of dredge spoil dumped were recorded and in compliance. Next programme starting Spring 2021.

Compliance

Within SFPC, the role of Compliance Officer exists as a focal point for the identification, assessment and evaluation of compliance with all; statutory requirements which affect the Company – including Corporate Governance, Environment, Health & Safety etc.

This is done using a proprietary on line system - Pegasus Legal Register (<http://www.pegasuslegalregister.com/en/>) – which identifies environmental and health and safety legislation applicable specifically to SFPC activities.

Compliance Evaluation is covered by internal Procedures, which sets out how SFPC identifies, evaluates and measures legal compliance associated with activities and operations within the Company. Identification of the relevant legislation is outsourced to Pegasus Legal Register, while the SFPC Compliance Officer is responsible for managing the evaluation process.

Energy

A detailed energy audit was undertaken by External consultant at Shannon Foynes Port Company, Foynes, Co. Limerick in accordance with the European Energy Efficiency Directive which is transposed into Irish Law by SI 426 of 2014 – European Union (Energy Efficiency Regulations) 2014. The site visits were conducted during November and December of 2016. The purpose of this energy audit was to develop energy efficiency opportunities for SFPC to implement and contribute to reaching the overall national energy efficiency targets and to make the organization more energy efficient.

Energy management is an all-encompassing process that should include every aspect of an organisation from finance, human resources and public relations to maintenance, purchasing and planning. An Energy Management Diagnostic Questionnaire was completed for the site. The purpose of the questionnaire was to assess the current level of energy management on site according to the 5 pillars of energy management:

1. Commitment: to energy management is vital to its success. When senior management commits to the process then formal plans can be made. Without this support there is a risk that any actions taken will be less effective.
2. Identify: once you have secured Commitment and the resources necessary to manage energy use, it is essential to develop an understanding of energy use and the factors that drive it. This will help focus attention and resources where the greatest impact can be made.
3. Plan: After commitment has been secured and an understanding of energy use and its factors has been achieved. Putting energy savings opportunities in place is the next step. It is important to plan how these energy goals and savings opportunities can be put into action.
4. Take Action: It is important that the key people who effect significant energy consumption in the organisation are aware of the opportunities and motivated to act. This can be achieved through communication, training & energy awareness.
5. Review: Monitoring and reviewing are vitally important stages in the process. With energy performance indicators in place, information obtained from measuring and monitoring energy use can be used to review and modify the on- going energy management system. This helps achieve continual improvement in the management of energy.

Three energy performance indicators were recommended for SFPC. The first recommended energy performance indicator is to monitor and compare electricity consumption in relation to tonnes imported on a weekly or monthly basis. The second is to monitor marked diesel consumption compared with monthly tonnes of product imported through the ports. Thirdly monitor monthly marked diesel consumption on pilot boats relative to tonnes of product imported through the ports. Using these indicators the energy performance of the organisation can be compared “benchmarked” with previous performances of the organisation in order to track progress.

6. SFPC Energy Efficiency 2019 (EPI 2)

In general, SFPC have achieved some positive progress in relation to Energy Efficiency. SEAI Annual Report on Public Sector Energy Efficiency reported that SFPC had achieved 30.3% better than baseline 2009. Taking this into consideration achieving the proposed 33% reduction by 2020 remains realistic for SFPC however greater challenges remain ahead. The 2019 Climate Action Plan set out 2030 targets for the Public Sector. They include:

- o reduce CO2 equivalent emissions from the sector by 30%
- o improve energy efficiency by 50%.

In line with the statutory responsibility of public bodies SFPC must continue to engage in a process to identify opportunities to improve. SEAI is working with stakeholders to fully define the targets and is

consulting with public bodies to define the methodology that will be used to track progress towards the targets

Energy Management

Energy Performance Officer - Provides leadership in the application of approved energy policy and any objectives, targets and programs approved by the executive

Energy Management Supports:

Project Coordinator - Energy efficient procurement and project management

Maintenance Team - Maintain operational performance in line with objectives and targets

Compliance Officer - Data management & reporting

External Consultant - Provide advice, guidance and support.

Initiatives Adopted by SFPC to Identify and Achieve Improvement

Appointed Energy Performance Officer

The Governance Structure of the Public Sector Energy Efficiency Strategy requires all public sector bodies to designate an Energy Performance Officer (EPO). Ultimately at SFPC the Management Team will be accountable for energy management and performance however the EPO will be in a position to work closely and possibly influence the Management Team with regard to potential energy improvement opportunities. The SFPC EPO will provide advice and leadership regarding energy management in the organisation and act as chair to the climate action committee.

Formation of Climate Action Committee

In 2020 the company formed a Climate Action Sub Committee to the Management Team which is populated by representatives from compliance, financial control & procurement, port services and engineering, marine ops and business development. The Committee is chaired by the Companies Compliance Officer. The first objective of this committee was to develop an SFPC climate action plan for approval by Management.

Promoting Green Teams & Employee Participation

SFPC continue to encourage engagement, discussion and employee participation. In 2020 the company set in place objectives to highlight the ambitious targets set by the state to improve energy performance and as such requested employees to get involved and assist by developing "Green Teams". To date a number of employees have signed up and participated in discussion to find opportunities to improve.

Climate Action Plan

This Climate Action will serve as the foundation to record and document ongoing improvements and opportunities to improve for the foreseeable future. Actions arising from the Climate Action Plan will be assigned to relevant departments and be tracked by the Climate Action Sub Committee to determine progress.

2021 Goals.

Continue to Implement Environment & Energy Policy

Action recommendations to improve and measure effectiveness

Utilise funding / financial / grant aids available

Maintain logical approach to improve energy efficiency while meeting obligations and duties of the organisation.

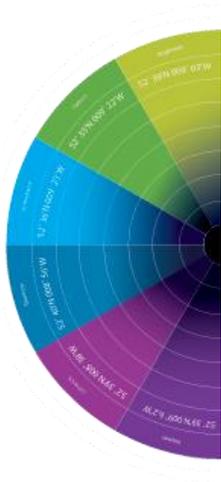
Promote energy efficiency and energy projects

7. SELECTED EXAMPLES OF BEST PRACTICE AND PLANNED ACTIVITIES

SFPC has been at the forefront of Port Environmental Initiatives in Ireland over the past number of years.

The Board and Management of SFPC is committed to the on-going development of a sustainable commercial future on the Shannon Estuary, in a way that recognises and addresses the natural and ecological significance of its environs, the value of which is recognised Nationally and at European level through the Natura 2000 network.

A number of examples of the practical ways in which this commitment is demonstrated are provided in the following pages:



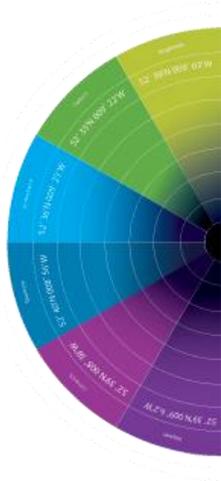
VISION | 2041

SFPC has undertaken the preparation of a Masterplan in order to promote and support the provision of port infrastructure and services in the Shannon Estuary over the next 30 years. The Masterplan looks specifically at growth and expansion options and consideration of non-core assets at its facilities at Foynes Port and Limerick Docks.

SFPC needs to be able to adapt to the continuous fluctuating business environment that exists and needs to be able to positively respond to potential investment opportunities in the region. It needs to ensure that the Port of Foynes and Limerick Docks will be ready and able to handle larger trade volumes efficiently and competitively when the opportunities arise and in doing so realise the economic potential of the natural resource that is the Shannon Estuary.

The Masterplan is part of a bigger picture for the Shannon Estuary as SFPC develops its vision for the future and focusses on the positive promotion of the Port as a strategic economic driver for the Mid West Region.

The approved SFPC Masterplan can be found at <http://www.sfpc.ie/about-us/port-development/sfpc-masterplan/>.



SFPC Waste Management Plan (WMP)

SFPC have prepared a comprehensive and detailed Waste Management Plan (WMP) (<http://www.sfpc.ie/about-us/environment/waste-management/>) which has been approved by the Marine Transport Division of the Irish Department of Transport, Tourism & Sport.

The purpose of the Plan is to ensure:

- *Compliance with relevant legislation;*
- *Company's responsibilities are discharged and transparent;*

- Port users are aware of their obligations;
- All vessels using the Estuary are aware of their obligations and the systems in place with regard to waste management;
- Local Authorities, when planning for waste management in their region, allow for the proper reception of port related waste;
- Department of Agriculture requirements in relation to waste management are met;

and covers all of the Shannon Estuary under the jurisdiction of SFPC, including the facilities at the following berths; Foynes, Aughinish, Shannon Airport, Limerick, ESB Moneypoint and Endesa Tarbert.

The Plan is a live document which is updated regularly (at least annually) to take account of changing legislation and developments regarding waste.

The Plan was approved in 2017 for 3 years, and will include the changes as a result of a new contractor, development of new practices with the Department of Agriculture which now includes the use of compactors at all SFPC sites, and the development of a new SOP for the landing and management of the waste from vessels.

Owing to the way in which the Plan has been developed to manage waste contractors, there is a high level of information available to SFPC on which to analyse and assess the performance of waste management practices at both Foynes and Limerick. The recording of recycled waste has commenced in January 2016 with a view to develop targets in the future.



Shannon Estuary Anti-Pollution Team Ltd (SEA - PT)

SFPC has been instrumental in the formation and operation of an Oil Pollution Consortium known as the Shannon Estuary Anti-Pollution Team Ltd. (SEA-PT) (<http://www.seapt.ie/>).

The team consists of the SFPC, Local Authorities and oil importers and was initiated to form a unified coordinated response to pollution incidents on the Shannon Estuary. Each member contributed initially to provide pollution response equipment and support tools. This equipment is available to respond to any pollution incident or threat. Members contribute annually to maintain equipment, carry out exercises and training and purchase new and replacement equipment.

The group has been in operation for the past 25 years under a committee of pollution officers representing the members. The aim of the group is to provide a unified response to oil pollution within the region, even though each member has individual responsibility for their own area.

Significant investment has been made in the development and updating of an oil Spill Tracking Model, Geographic Information System, Environmental Atlas, Sensitivity Study, Oil Spill Response Strategy, Hydrocarbon Baseline Study and Emergency Response Plans for the region.

A new plan was approved in 2018 valid for 3 years.



- Liaising with local Universities with regard to Graduate and Post Graduate studies
- Other institutes such as SOLAS (Formerly FÁS) who provide a range of training options available to Job Seekers to assist their re-entry into the labour market.

Solution Form 3 outlines the work completed on the COMPASS programme which is ongoing in its second competition, with the first competition completed in February 2015.



Air Quality

SFPC have implemented a programme of dust monitoring at operations in Foynes, and more recently in Limerick, to establish overall levels of dust generations associated with cargo handling operations.

Although not a Statutory requirement, SFPC have implemented monitoring in order to provide real information on the levels of dust which may arise during cargo handling, and to provide a performance measurement against which the dust controls on cargo handling operations can be evaluated.

SFPC have commissioned OES in late 2015 to complete an analysis of all cargoes handled at Foynes and Limerick with regard to their individual characteristics and effect of the environment and health. This report commenced early 2016 and is now available.



It is a key objective of Shannon Foynes Port Company’s 30 Year Plan “Vision 2041” and a policy imperative for SFPC that the development and operation of the Ports must benefit the wider community and in particular those living in the town of Foynes and Limerick City. Societal integration of the Port of Foynes and Limerick Docks is seen as an integral part of the corporate social responsibility (CSR) of SFPC.

it is an objective of SFPC that these functions are facilitated along with the implementation of initiatives which are aimed at securing greater integration of

the Ports into communities. The relationship between cities and their ports remains one of interdependency and should be ruled by long-term strategic vision and planning. It is therefore important to both SFPC and to the people of Limerick and Foynes to strengthen their association. This policy objective will underpin both how SFPC operates its current business and any development proposals envisaged under Vision 2041. In this regard it is proposed to undertake a number of initiatives in the short term and over the course of Vision 2041 to achieve integration between the Port of Foynes and Foynes town and between Limerick Docks and Limerick city.

The best way to communicate with the general public is to activate them and bring them into the Port, either in a guided way or on their own initiative. This implies that the port area should be attractive and accessible for visitors, taking into account security regulations. In line with this initiative, therefore, a general cleaning up of Port activity must be promoted and which is subsequently addressed in Vision 2041. SFPC commits to making the Ports more accessible and to build on its existing public access strategy which facilitates organised tours including schools & university visits.

One of the main objectives of this integration is to ensure public accessibility through the hosting of “open days” and organised tours. The Board and Management Team, on this topic, decided to develop further on school tours and include these under COMPASS, Creating our Marine Ports and Schools synergy, with a Post Primary Schools competition, which would include visits to our Ports and in addition, our staff visiting schools to promote the ports message.

8. CONTACT INFORMATION

For Further Information, SFPC contact details are as follows:

Shannon Foynes Port Company,
Harbour Office,
Foynes,
Co. Limerick,
Ireland

T: +353 69 73100

F: +353 69 65142

E: info@sfpc.ie

W: sfpc.ie

Register of Environmental Aspects

Environmental Aspect Register	Port of: <i>Shannon Foynes Port Company</i>
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1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
	Aspects					
	Port					
	Marine Operations					
H1	Bunkering – Spillage of Fuel	Water/Soil	Harbour Master	Local Government (Water Pollution) Acts 1977 – 2009 Shannon Estuary Marine Emergency Plan 2020 SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018	Pollution of waterways	EHS 014 Emergency Preparedness & Response Procedure ESOP/012 Prevention of pollution from vessels bunkering at anchor or alongside any facility on the estuary
H2	Shipping - Noise	Community/Ecology	Harbour Master	Environmental Protection Agency Act 1992 (Noise) Regulations 1994	Average noise levels < 60 dB(A)	Generally low-level noise, broad band in nature, transient during shipping arrivals/departures
	Shipping– Waste Removal	Water/Soil	Harbour Master	Dumping at Sea (DAS) Acts 1996 to 2012	Waste Management	EHS 024 Waste Management Plan 2018

1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
				Waste Management Acts 1966 – 2012		
	Shipping – Ballast water	Water	Harbour Master	Local Government (Water Pollution) Acts 1977 – 2009	Pollution of waterways	ESOP/008 Control of discharge of waste water in the estuary
	Shipping – Hold washings	Water/Ecology	Harbour Master	Local Government (Water Pollution) Acts 1977 – 2009	Pollution of waterways	SESOP/004 Control the discharge of ship hold washings into estuary waters
	Shipping - Emergencies	All Environmental Media	Harbour Master	Local Government (Water Pollution) Acts 1977 – 2009 Shannon Estuary Marine Emergency Plan 2020	Emergency preparedness	ESOP/002 Prevention of pollution from vessels breaking away from any facility on the estuary
	Port Services & Engineering					
M1	Dredging – Sediment Disposal	Water/Ecology	Ports Services & Eng. Mgr.	Dumping at Sea (DAS) Acts 1996 to 2012	Maintenance of habitat and ecosystems	EPA Dumping at Sea Permit Reg. No S0009-02
M2	Dredging - Sediment Contaminants	Water/Ecology	Ports Services & Eng. Mgr.	Dumping at Sea (DAS) Acts 1996 to 2012 Habitats Directive/ Birds Directive	Maintenance of habitat and ecosystems	EPA Dumping at Sea Permit Reg. No S0009-02
M3	Port	Water/Waste/Air	Ports Services & Eng.	SFPC Waste	Ecosystem and	Noise/Dust Monitoring;

1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
	Development/Construction	/Noise /Ecology	Mgr.	Management Plan 2019 SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018	built environment	MMO during works (dolphin monitoring) ESOP/013 To ensure port development does not impact on eco systems or habitats
M4	Port Infrastructure - Drainage	Water/Ecology	Ports Services & Eng. Mgr.	Local Government (Water Pollution) Acts 1977 – 2009 Shannon Estuary Marine Emergency Plan 2020	Pollution of waterways	Drainage system inspected and maintained by SFPC. ESOP/008 Control of discharge of waste water in the estuary Monitoring plan being developed
M5	Contracted Services	All Environmental Media	Ports Services & Eng. Mgr.	Local Government (Water Pollution) Acts 1977 – 2009 Waste Management Act 1996 SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018	Pollution of waterways	Approved Contractors with prior approval to access the port areas Speed limit applied on site List of approved chemicals for use in port.
	Environmental Department					

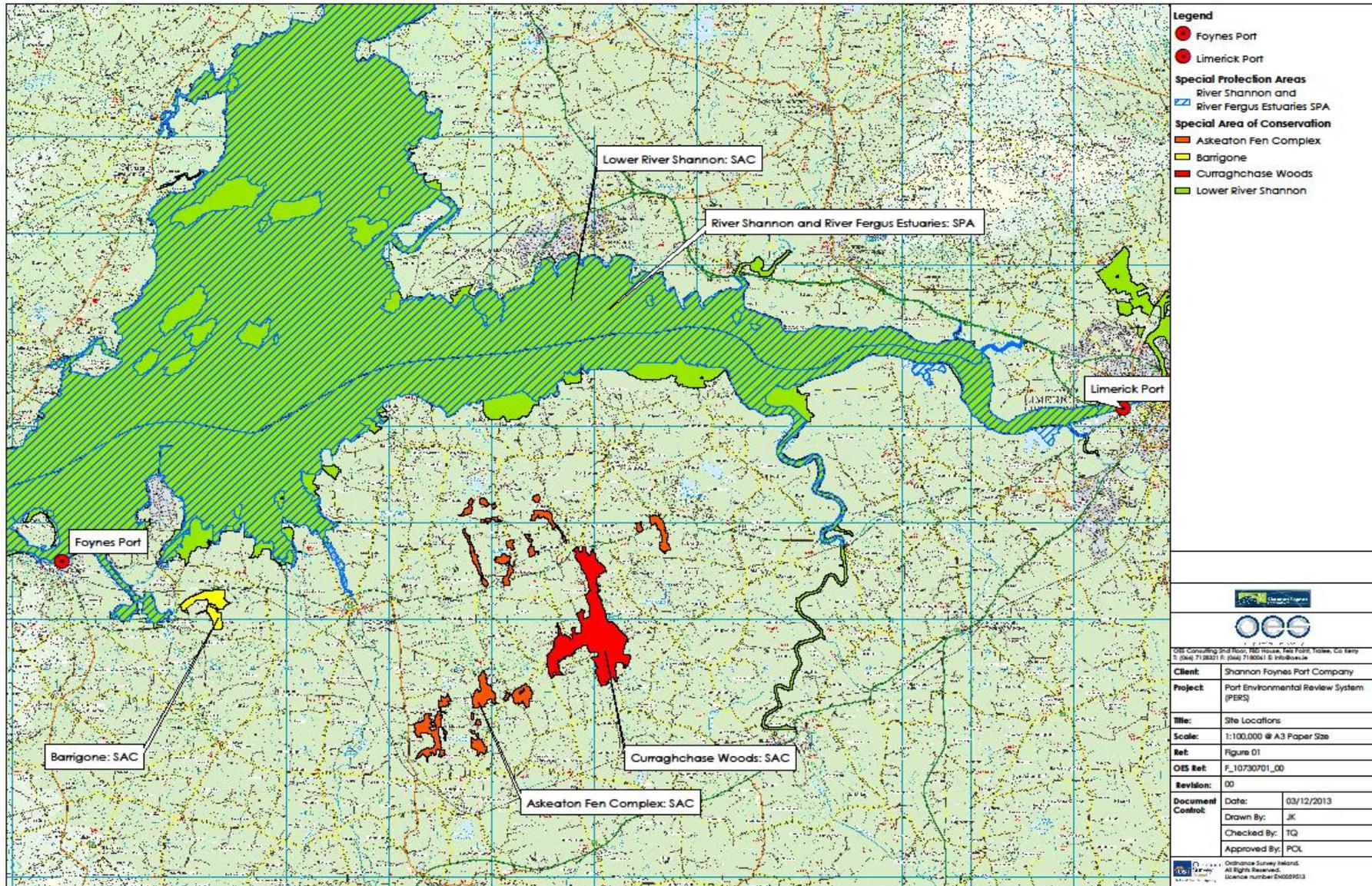
1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
E1	Port Operations - Noise	Community/Ecology	Ports Services & Eng. Mgr./ Harbour Master	Environmental Protection Agency Act 1992 (Noise) Regulations 1994	Regulation of noise	EHS 038 Noise Monitoring & Control ESOP/019 Prevention of noise pollution arising from cargo operations
E2	Port Operations – Spillages	Water/Air	Ports Services & Eng. Mgr./ Harbour Master	Local Government (Water Pollution) Acts 1977 – 2009 Shannon Estuary Marine Emergency Plan 2016 SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018	Pollution of waterways	ESOP/009 Control of cargo spillages onto jetties during cargo operations
E3	Port Operations – Fugitive Dust	Air/Land/Water	Ports Services & Eng. Mgr./ Harbour Master	Air Pollution Act 1996	Air Quality	ESOP/001 Control of Dust Emissions from bulk cargo operations Monitoring
E4	Port Operations – Water Supply	All Personnel	Ports Services & Eng. Mgr.	EC (Quality of Water Intended for Human Consumption) Regulations, 1988	Control of potable water	Monitoring
	Tenants and Organisations					
T1	Trade Activities - Discharges of Trade Effluent	Water/Soil	Tenant Companies	Local Government (Water Pollution) Acts 1977 – 2009	Pollution of waterways	Tenants responsible for compliance with Local Authority Licences

1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
				S4 Discharge Licences from Local Authority		
T2	Trade Activities - Waste	Water/Soil	Tenant Companies	Waste Management Act 1996 EPA Waste Licence Local Authority Waste Permit	Management of waste	Tenants responsible for compliance with Local Authority /EPA Licences
T3	Trade Activities - Noise	Community/Ecology	Tenant Companies	Planning & Development Act 2001 Environmental Protection Agency Act 1992 (Noise) Regulations 1994	Regulation of noise	Tenants responsible for noise levels. Complaints re-directed to Tenant if received by SFPC.
	Trade Activities - Dust	Air/Land/Water	Tenant Companies	Air Pollution Act 1996	Air quality	ESOP/014 To control dust emissions from trucks loading ex stores / warehouses Monitoring
T4	Trade Activities - Spillages	Water/Soil/Air	Tenant Companies	Local Government (Water Pollution) Acts 1977 – 2009 Planning & Development Act 2001 SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018	Pollution of waterways	EHS 014 Emergency Preparedness & Response Procedure ESOP/010 Control of cargo spillages from trucks
T4	Trade Activities - Emergencies	Water/Soil/Air	Tenant Companies	SEVESO II Directive	Emergency preparedness	Notification to HAS

1	2	3	4	5	6	7
Ref. Nr.	(sub) department, tenant, operators	Impact on	Responsible person / organisation	Applicable legislation	Legal requirements	Control measures
T5	Local Community	Community, Development, business and environment.	Port Services, Senior Management	Business continuity	Sustainability operations and future development	Interaction with local community, addressing complaints and information flow.

ATTACHMENT 2

Location Map



ATTACHMENT 3

SFPC H&S Policy

SFPC EHS SOP		Health & Safety Policy	
Doc No. : EHS/001		Rev No.: 07	Page 1 of 1
Issue Date: 18.07.2016	Written by: M. Geoghegan	Approved by: J. Carton	

Shannon Foynes Port Company - Health & Safety Policy

Shannon Foynes Port Company (SFPC) is the Port Authority with Statutory responsibility for commercial maritime activities within the limits defined in the Harbours Acts and amendments 1996-2015.

It is the policy of this company to implement and maintain, in so far as is reasonably practicable, systems and procedures to prevent maritime activities and actions that pose a threat or have a negative impact on human health & safety or damage to the natural environment.

All employees have the responsibility to cooperate with Management, Supervision and principle staff members to achieve the satisfactory implementation of this policy.

SFPC is committed to:

- Developing and implementing an Integrated Management System which incorporates H&S management that is appropriate to the nature, scale and impacts of our activities or services and in accordance with BS OHSAS 18001
- Comply with our statutory, non-statutory and best practice obligations as outlined by legislation, shareholder and industry best practice in so far as is reasonably practicable
- Consult with employees, tenants and contractors on H&S matters and encourage participation in H&S management programs, promoting a positive H&S culture within the scope of SFPC responsibilities.
- Evaluate and regularly review, H&S risks associated with the company's activities, documenting programs to eliminate or reduce, in so far as is reasonably practicable, any risks identified.
- Promote continual improvement of the H&S management system through performance measurement setting and reviewing objectives and targets approved as part of H&S management programs.
- Develop awareness amongst staff and employees of their responsibility for their own safety and that of their colleagues.
- Facilitate elected H&S representatives in all matters regarding H&S at SFPC.
- Ensure this H&S Policy is reviewed annually and/or if the business changes in nature or size.

Employees are hereby notified of the company policy and encouraged to comply with their statutory duties and to notify company management of identified H&S hazards the workplace.

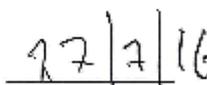
Copies of this Policy are made available at company locations and available to interested parties upon request.

The allocation of duties for H&S matters and particular arrangements to implement this policy are set out in the SFPC Integrated Management System Manual.

Responsibility for implementation and communication of the H&S Policy and associated documentation lies with the Chief Executive Officer, the Port Services Manager (H&S Manager), the Board of Directors and Management Team general, who will ensure the objectives of this policy are achieved.



Pat Keating
Chief Executive Officer



Date

ATTACHMENT 4

SFPC CSR
Policy

Approved by: Board
Date: 05th Oct 2012

Corporate Social Responsibility Policy Statement

Shannon Foynes Port Company, Ireland's second largest port operation, has statutory jurisdiction over all marine activities on a 500km² area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The strategic location of our terminals offers access to the vibrant economy and population of a large part of Ireland.

Our key activities centre on the provision of a safe haven for shipping in the Shannon Estuary by traffic management within the port limits; the maintenance and development of terminal and shore-side facilities; and the operation of cargo handling and logistic services.

Our corporate social objectives aim to apply good business behaviour over and above legal requirements where reasonably practicable, to areas such as health & safety, environmental impact, customer service, working conditions and the community.

SFPC is committed to the development of modern and efficient systems and recognises good Corporate Social Responsibility to be of equal importance to other prime business considerations.

SFPC key CSR Management Areas:

Health & Safety:

- Significant investment in health and safety management, administration and training
- Use of the OHSAS 18001 management system to drive best practice and meet legal obligations.
- Maintain safe and secure port entry within all facilities
- Annually review safety performance with an objective to continually improve.

Environment:

- Commitment to environmentally responsible actions in energy efficiency, conservation, risk management, emergency planning, and responsible waste management
- Encourage wide consultation, dialogue and cooperation between port users and stakeholders to facilitate sustainable economic development.
- Embracing new technologies and management systems to assess and minimise the company's 'carbon footprint'
- Implementation of effective management systems (PERS) as a key component of business to drive continual improvement in environmental performance

Approved by the Board of Directors

1 of 2

Community:

- Embracing co-habitation and dialogue with national, regional & local authorities and local communities
- Conserve good relations with those effected by our activities and operations
- Promote public awareness through local media, company website and familiarisation programmes such as open days & school visits
- Improve support and interaction with local residential and business communities.
- Improve the image of our ports within the communities of Foynes & Limerick, different ranges of external stakeholders, wider communities and general public
- Facilitate public access to our archived records in a controlled environment.

Marketplace:

- Maintain the highest ethical standards in accordance with the code of practice for governance of state bodies.
- Use the externally validated ISO 9001:2008 management system to provide and measure appropriate 'duty of care' and service in respect of stakeholders, customers and suppliers
- Enhancing the international reputation of the Shannon Region as a unique natural environment available for sustainable development.
- Develop strategic plans to promote and support the provision of port infrastructure and services in the Shannon Estuary into the future
- Promote our Ports as key economic drivers within the region
- Monitor and evaluate customer satisfaction and promote continual improvement

Workplace:

- Providing best practice labour standards and employee welfare
- Support Human Resources to ensure all aspects contribute to business success
- Promote equal opportunity and progress equality and diversity throughout the company.
- Support training and development programmes to provide core skills requirements, personal development and continuous professional development to facilitate business success
- Provide proper management, custody, care and conservation of records and archives.

Responsibility:

The Responsibility for the overall direction of the CSR Policy lies with Board and the Chief Executive. The Chief Executive and Management Team ensure that the Policy is understood, implemented and maintained at all levels of the organisation.

SFPC will provide resources in terms of people, materials and equipment to ensure the delivery of this policy.

Signed: _____
Pat Keating
 Chief Executive Officer

Date: _____

Approved by the Board of Directors

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