



Group Environment, Health & Safety Plan

2021/22

Work safe. **Home safe.**



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FOREWORD FROM MARK WHITWORTH, CEO

I am pleased to confirm that Peel Ports continues to meet its strategic Environment, Health and Safety (EHS) goals. The number of lost time incidents has fallen from 55 in 2017/18 to 3 in 2020/21.



This improvement has been driven by your commitment to safe working and I would like to take this opportunity to thank you all. Across Peel Ports operations in the United Kingdom and Ireland, fifteen out of sixteen ports and terminals have worked for over one year without a one-day lost time incident. Peel Ports is now recognised as the safest port Group in the UK, which is something we can all be very proud of. We must now build upon this improved safety performance by focussing on reducing injuries of all types.

The ports environment is hazardous, and it is our duty to recognise and control them. It takes a few minutes before each task to consider what could go wrong and whether we have gone far enough to ensure the safety of our colleagues. This is the culture that will help us continue on the path of zero injuries.

Furthermore, our commitment to sustainable operations has never been greater. Climate change is a global concern and presents a growing risk to ports operations. To highlight the importance of business planning for climate change, workshops ran in January and November 2020 with colleagues from across the Peel Ports Group. The workshops highlighted climate change projections for Peel Ports and encouraged attendees to identify the risks that climate change could pose to our operations. Following the first workshop, Peel Ports signed up as a supporter of PIANC (World Association for Waterborne Transport Infrastructure). Their "Navigating a Changing Climate" initiative will support our business planning and we have now established a strategic Climate Change Working Group.

Last, but not least, I must turn to the subject of the international pandemic. Thanks to your support for a wide variety of changes to business processes and practices, infection rates among staff have been consistently lower than the general public. Collectively as key workers, you have played a central role in ensuring the continued supply of essential goods to the United Kingdom and Ireland. At various times this has included medical equipment, medicines, PPE and a wide variety of essential produce.

It has been an extraordinary year and one that will live long in the memory. You may rest assured that you have played your part. You have demonstrated that we can look to the future with confidence in our ability to manage risks to a high standard and deliver our strategic goal of safe and sustainable operations.

Mark Whitworth
CEO, Peel Ports Group

1. INTRODUCTION

The delivery of the 2021/2022 EHS plan will make a significant contribution to:

- reducing the risk of injury to employees, contractors, visitors and members of the public;
- protecting the health of employees e.g. from the potentially harmful effects of exposure to noise, vibration, dust etc;
- building a strong and effective safety culture among employees at every level;
- maintaining Peel Ports reputation as a 'responsible operator' among all stakeholders including the communities in which we operate;
- driving towards sustainable operations, seeking ways to mitigate the projected impacts of climate change
- reducing emissions to air, land and water
- demonstrating full compliance with all statutory requirements as they relate to health, safety, welfare and environmental legislation.

This document presents the Peel Ports Group Environmental, Health and Safety objectives and targets for 2021/2022.

Core values

Peel Ports "Core Values" represent the five pillars that help to guide our thriving and successful business. During 2018, the first Value, "Personal Responsibility" was amended to ensure that our values refer explicitly to our company's safety commitment.

1. Personal responsibility

We are accountable for our decisions and actions, together with the outcomes we create and the impact on others.

This is true of all business activities and most importantly those that could affect the health and safety of our colleagues. We must ensure that everyone returns home safely to their families every day.

2. Integrity and honesty

Having integrity and being honest are fundamental requirements of personal development.

Honesty and integrity produce trust, which, in turn, produces confidence and encourages us to take risks in order to fulfil our goals.

3. Strive for excellence

We follow and uphold the rules and standards set for our business and remain committed to quality outcomes, have a thirst to learn and to continuously improve.

4. Heartfelt customer service

Creating positive customer experience is what we strive to do. Our customer relationships are long term and need to be sustained; they are not simply transactional.

5. One team

Whatever the strength of individuals, we will always accomplish more together. We put the team ahead of our personal success and commit to building its capability.

These core values are the essence of Peel Ports' identity.

2. EHS MARKETING PLAN AND COMMUNICATIONS

Peel Ports commitment to a safe and sustainable environment is supported by the EHS Marketing and Communications Plan. The success of the plan is based on the adoption of robust standards and the communication to employees supports the effective management of change. Effective communications are a key component of the success of any workplace vision.

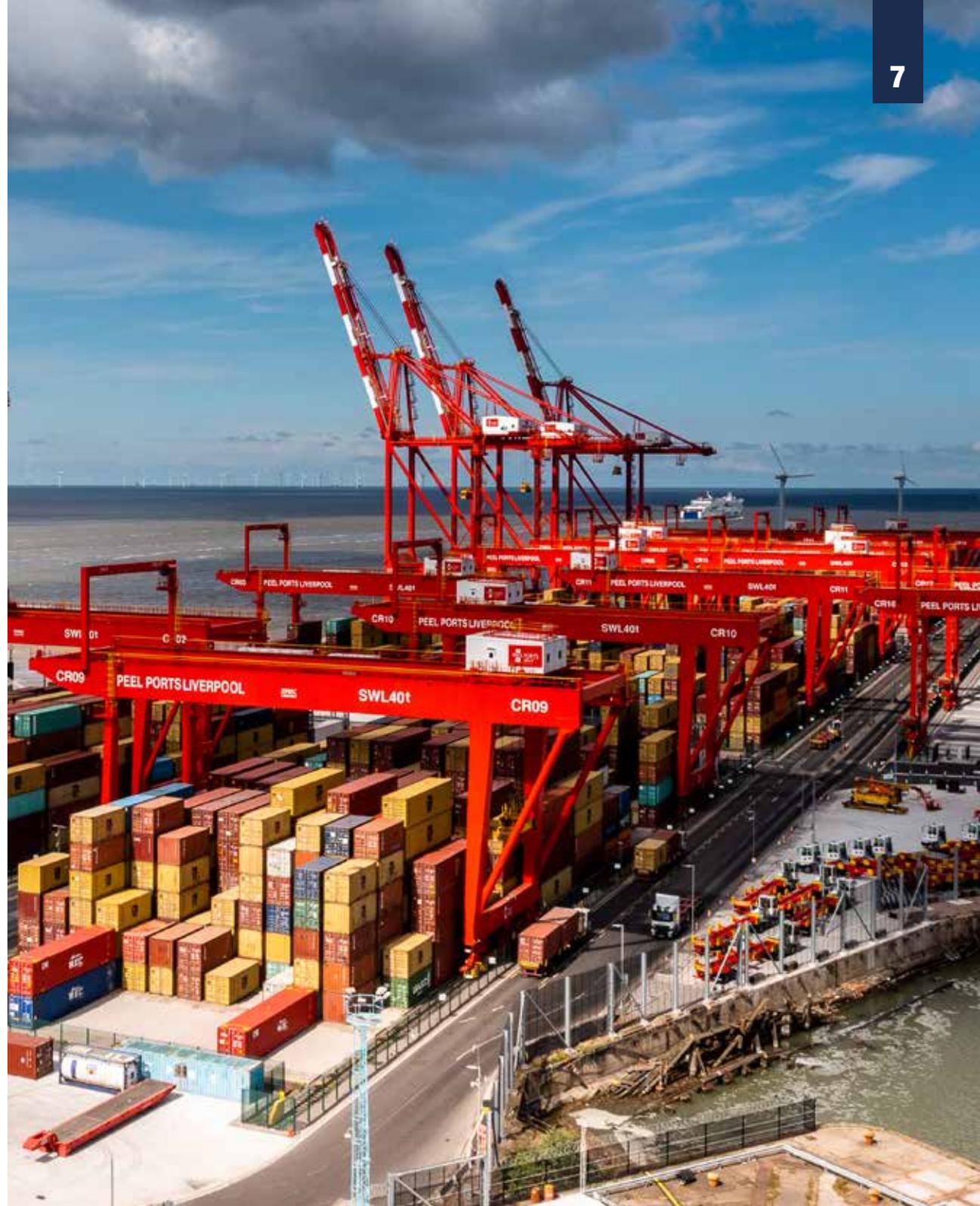
The Institute of Occupation Safety and Health states that 'Communication is not simply the transmission of messages; rather, it is the mutual exchange of understanding and shared meaning leading to co-operation and better practices.'

Our EHS teams work closely with Peel Ports Marketing team to promote effective media including EHS campaign materials, newsletters, bulletins, briefings, alerts, awards and digital media including the company intranet and internet.

During 2021, the Safety Climate Survey will again gather feedback on employees' views of communications, and these will be used to further improve the methods and media employed. Peel Ports quarterly environmental newsletter improves the environmental narrative by promoting and discussing relevant topics. The newsletter includes stories on internal work and publications, general environmental awareness items and changes in legislation. It is distributed to managers around the Group and forwarded to interested parties as appropriate.

The EHS team has adopted a new version of Microsoft SharePoint for document storage. An increasing quantity of information will be distributed through SharePoint by providing live links to documents. This has improved version control because there is only one 'master' version in circulation. This approach means that we are also lowering our carbon footprint by excluding attachments from emails, decreasing the carbon footprint of these media by approximately 95%.

	Target Title	Owner	Due Date
Target #1	Prepare and publish an EHS Marketing and Communications Plan for all relevant media.	Ron Hunter, Alex Pepper and Kelly Ralph	30 Jun 2021
Target #2	Produce a quarterly newsletter for staff during the year.	Ron Hunter, Alex Pepper and Kelly Ralph	30 Mar 2022



3.

SAP FOR ENVIRONMENT, HEALTH AND SAFETY

In 2019 Peel Ports shareholders approved an investment for an integrated business-wide IT platform known as “SAP”. Implementation is ongoing and will include the benefits associated with leveraging a modern and comprehensive business system.

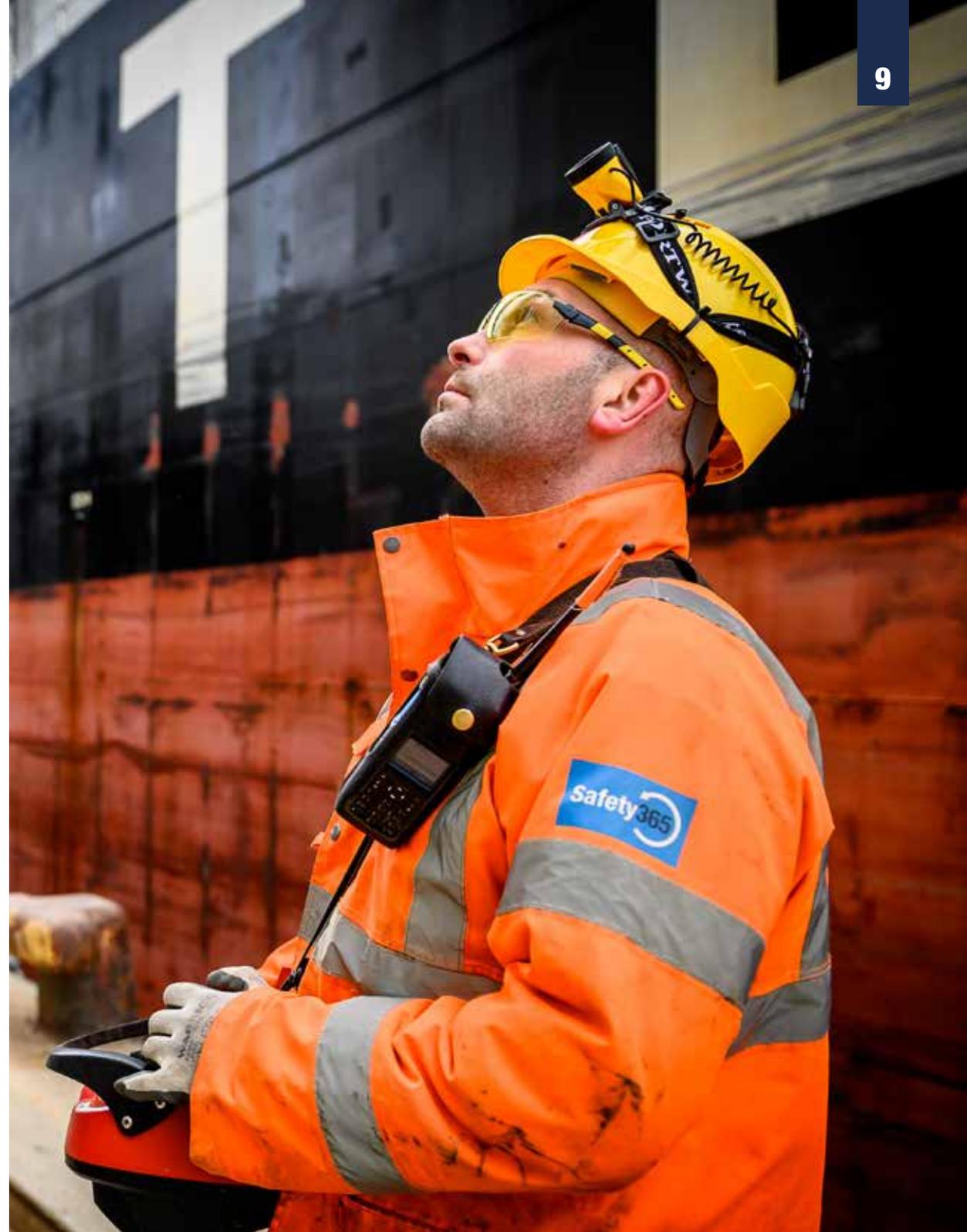
Implementing the SAP system is allowing us to manage our operations in the same way as other large and diverse businesses using best practice processes and procedures.

Our ambitious growth and operational plans are dependent on us being able to utilise current technology which includes systems that can give us fast access to reliable business information. SAP gives us the opportunity to transform the Peel Ports Group.

A host of business teams are already benefiting from SAP’s extensive toolsets however these will now start to encompass processes that support environment, health and safety from a landside and marine perspective.

This phase of the project launched in April 2021 and is targeted to deliver in November 2021.

	Target Title	Owner	Due Date
Target #3	Identify the business resources (including Project Manager) required to join the implementation team, in support of a successful SAP implementation.	Ron Hunter and Alex Pepper	1 April 2021
Target #4	Establish the backfill requirements (for project resources) to provide continuity for port operations.	Ron Hunter and Alex Pepper	1 April 2021
Target #5	Ensure that existing SAP processes are examined, and Peel Ports requirements are communicated and incorporated in SAP system design.	Ron Hunter and Alex Pepper	1 Aug 2021
Target #6	Agree SAP launch requirements in terms of employee training and systems and user documentation.	Ron Hunter and Alex Pepper	1 Aug 2021
Target #7	Support a successful launch of the SAP application.	Ron Hunter and Alex Pepper	30 Nov 2021



4. GROUP ISO STANDARDS AND CERTIFICATION

ISO (International Organisation for Standardisation) is an independent, non-governmental, organisation that develops documented standards for environmental management, health & safety management and quality management (among many other disciplines).

ISO certification certifies that a management system, operational processes, services and procedures have the requirements for standardisation and quality assurance.

The main benefits of ISO certification include:

- suitability for small and large port operations
- providing an aid to improved internal management
- helping to improve efficiency and avoid waste
- supporting increases in productivity and profit
- assisting customer satisfaction, retention and acquisition
- encouraging consistent and appropriate processes

ISO certification demonstrates an independent standard, widely recognised by stakeholders.

The principle ISO standards in scope for Peel Ports are:

- Environmental Management: ISO14001
- Health and Safety Management: ISO45001
- Quality Management: ISO9001

The strategy for Peel Ports is to progress to full certification for port operations within two years.

This will help to standardise EHS processes, share good practice and promote continual improvement. Each of the standards is based on the 'plan, do, check, act' philosophy which is already embedded in our EHS approach.

Until the new international health and safety standard ISO45001 was developed, many organisations used the British Standard OHSAS18001. With the publication of ISO45001 however organisations transitioning from OHSAS 18001 to ISO 45001 have until September 2021 to migrate to the new standard. This is already underway for all terminals in scope.

ISO45001 focuses on the same core subjects as OHSAS18001, which help to reduce occupational injuries and make organisations safer and more secure places to work. Like other ISO standards, ISO 45001 uses a structured framework to integrate policies, processes and controls.

Peel Ports currently holds a number of certifications. These include full certification for the Mersey Biomass and Steel & Metals terminals and the Port of Great Yarmouth. Many other areas within the Group, have partial certification or are structuring their management systems on an ongoing basis, with the goal of seeking certification in the future.

Further significant progress is planned for 2021/22. Sheerness will achieve ISO14001 and complete their suite of EHS standards. In doing so, the Peel Ports South East Cluster will become the first cluster to be fully certified.

Meantime the Mersey Cluster bulk terminals will complete their ISO certifications by obtaining all three ISO standards for the Animal Feed Terminal and the Grain Terminal.

And, at Peel Ports Logistics, Ellesmere Port, the ISO9001 standard currently held will provide the foundation for obtaining certification in 2021/22 for ISO14001 and ISO45001. At Runcorn all three ISO standards will be introduced and certified to the same timescale.

These targets for 2021/22 will then lead to the full certification of all operational sites by the end of March 2023.

	Target Title	Owner	Due Date
Target #8	Sheerness will achieve ISO14001 and complete their suite of EHS standards.	Richard Goffin	31 Mar 2022
Target #9	Mersey's Animal Feed Terminal will deliver certification to ISO14001, ISO45001 and ISO9001.	Phil Hall	31 Mar 2022
Target #10	Mersey's Grain Terminal will deliver certification to ISO14001, ISO45001 and ISO9001.	Phil Hall	31 Mar 2022
Target #11	Peel Ports Logistics at Ellesmere Port will deliver certification to ISO14001 and ISO45001.	Seb Gardiner	31 Mar 2022
Target #12	Peel Ports Logistics at Runcorn will deliver certification to ISO14001, ISO45001 and ISO9001.	Seb Gardiner	31 Mar 2022
Target #13	The Peel Ports Group will deliver ISO certification for all three standards for all operational areas.	Ron Hunter and Alex Pepper	31 Mar 2023

5. EHS PERFORMANCE DASHBOARD

The Peel Ports Board receive a monthly performance report which details EHS performance and status over a range of key performance indicators. This is shared on the intranet each month for all employees to view.

The current report requires considerable manual intervention to draw information from multiple sources (Sphera, the VFL system, Success Factors and spreadsheets).

“Microsoft BI” is an analytics tool which offers a real-time picture of performance derived automatically from a variety of sources. With up to date, accurate data on EHS performance the business will have the information needed to respond to emerging trends in a timely fashion. This will naturally support well-informed decision making aimed at making our ports safer and protecting the environment.

A project has been launched to introduce Microsoft BI for EHS in 2021/22. The resulting reports will also be used by our ports and terminals so that everyone has access to the same quality of data and analyses.

	Target Title	Owner	Due Date
Target #14	Establish cross-functional team to design and develop a new EHS Performance Dashboard	Chris Ingham	30 Apr 2021
Target #15	Develop the dashboard in discussion with members of the Group EHS Governance Committee	Chris Ingham	31 May 2021
Target #16	Launch the new Performance Dashboard and place monthly on the Peel Ports Intranet	Chris Ingham	30 Jun 2021



6. LEARNING MANAGEMENT SYSTEM FOR EHS

One of the key deliverables of the SAP IT system (see Section 3) is a new “Learning Management System (LMS)”. An LMS is a software application for the administration, tracking, reporting, and delivery of training programmes.

The LMS is used to design training programmes and identify training gaps. It uses analytical data and reports to confirm the delivery of successful training programmes. Ensuring that employees are trained and competent are key components of a safety management system (and a legal obligation).

Peel Ports LMS activities during 2021/22 will be focused on:

- data cleansing of legacy systems; examining existing training records for accuracy and suitability for transfer to SAP LMS
- developing “assignment profiles” to record the appropriate training interventions according to role, and making these consistent (where appropriate) across the Group
- developing proactive reporting methods so that the status of training and employees’ future training requirements are understood and actioned by the relevant business area whilst giving clear visibility at Port Director and Executive level

These activities are targeted to complete by 30th September 2021.

	Target Title	Owner	Due Date
Target #17	Complete the programme of data cleansing, examining training records for accuracy and suitability for transfer.	Amanda Willis	31 May 2021
Target #18	Develop “assignment profiles” according to role and making these consistent (where appropriate) across the Group.	Amanda Willis	31 May 2021
Target #19	Deliver proactive reporting methods so that the status of training and employees’ future training requirements are understood and actioned.	Amanda Willis	30 Sep 2021



7. EHS DOCUMENT MANAGEMENT SYSTEM

Peel Ports has recently introduced a centralised document management system for environment, health and safety information based on Microsoft “SharePoint Online”. This presents a central “hub site” for EHS and is further divided into portals for functions and ports.

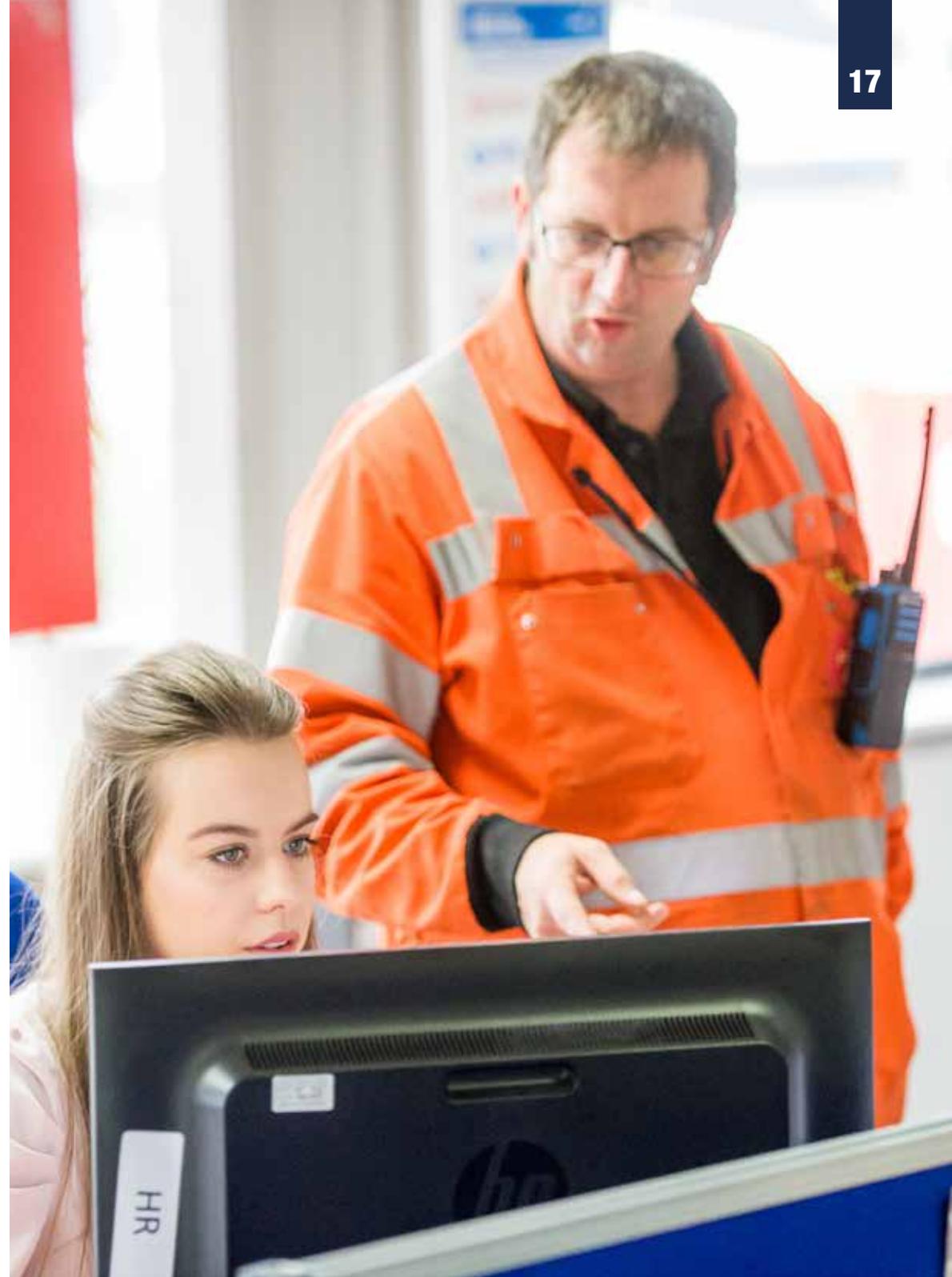
Within each site there are further pages for news and communications, policies and procedures, permits and consents, safety bulletins, toolbox talks etc.

Documents are categorised and tagged (via metadata) by department, cluster, terminal, document type (e.g. policy, procedure, inspection, permit etc.) and can be filtered and viewed accordingly. There is also a folder structure which includes policies, procedures, audits, permits, operational documents etc.

Adopting a consistent approach to the management of documents across the Group will help all employees locate documents easily for reference and information. It will also support the maintenance of controlled documents.

This initiative provides a high degree of alignment with our strategies for ISO accreditation (Section 4) which will run in parallel. Document Controllers have been identified for every port and they will work with the Group Head of EHS and Group Head of Energy and Environment, to continue to develop and derive best value from the system.

	Target Title	Owner	Due Date
Target #20	Establish a monthly working group for Peel Ports document controllers to monitor completion of the transfer of EHS documents to SharePoint Online.	Chris Ingham/ Alex Pepper	31 Jul 2021
Target #21	Embed Peel Ports design of the document repository e.g. the consistent application and use of metadata to support high standards of document management.	Chris Ingham/ Alex Pepper	31 Dec 2022
Target #22	Further develop Group guidance and materials as necessary to support the successful adoption of the new Document Management System.	Chris Ingham/ Alex Pepper	31 Dec 2022
Target #23	Port Directors to ensure that EHS documents are captured and transferred to the new Document Management System.	Port Directors	31 Mar 2022



8. PEEL PORTS TENANT INTERFACE POLICY

Peel Ports' tenants have the potential to impact on Peel Ports' environment, health and safety goals. This may arise for example, from a pollution event that contaminates our drains and pollutes the river. This would be expected to impact on public perceptions of our sites and Peel Ports reputation as a responsible operator.

Our Operational Estates team has recently implemented a "Tenant Interface Policy" which applies to all sites. The contractual process has been amended to ensure that tenants engaging in new or updated contracts, declare the requirement for new permits or consents for planned operations.

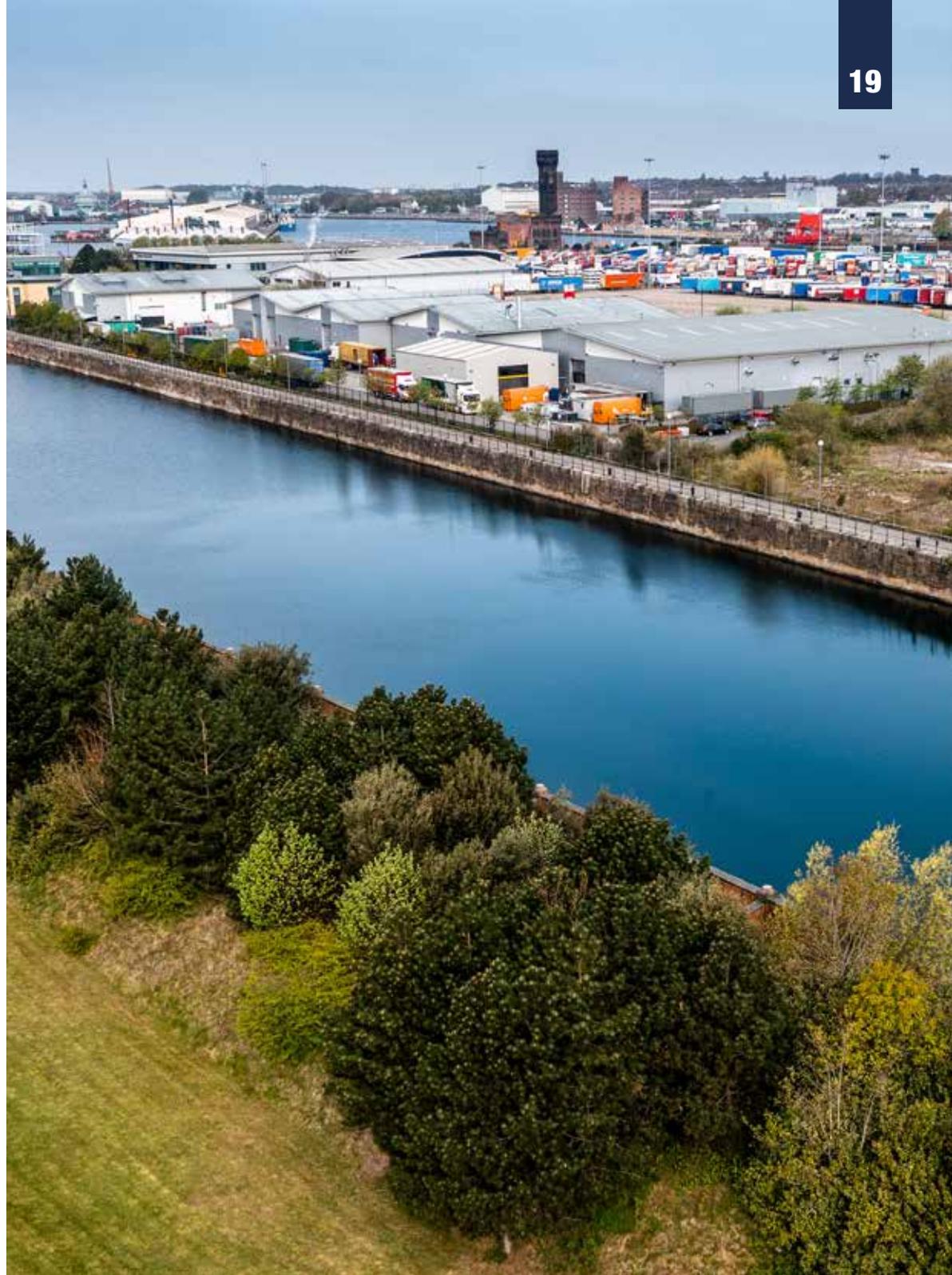
We have also progressed a review of public registers (against existing leases) to establish which tenants hold environmental consents on our landholdings.

These policies will embed a consistent, proactive management approach that is applied to all third-party occupiers to ensure they comply with Peel Ports Group's EHS obligations and standards for occupancy. They cover the interface at site level of each Tenant's occupation lifecycle, starting at lease inception, through to occupation and expiry/vacation.

Roles and responsibilities have been established for the estates team (for management of the policy), local Port Directors (incorporating tenant risk into local risk registers) and the EHS team (maintaining up to date records of tenants' environmental consents).

These processes will help to ensure that risks arising from the tenant interface are well-controlled and the processes will be audited on an ongoing basis.

	Target Title	Owner	Due Date
Target #24	An audit will be progressed each year (starting Jul 2022). In the interim, Group EHS will include this topic in the audit programme from Sep 2021.	Ron Hunter	31 Mar 2022



9. THE MANAGEMENT OF CHANGE

During 2020/21, Peel Ports introduced a Group standard (PRC 230 PPG HSE) for the Management of Change (MoC). Change management is a process that helps to ease organisational transitions. It helps employees and stakeholders understand risk, commit to, accept, and embrace change.

Change can occur in an organisation in many ways including strategic, leadership and technological changes. Change management communicates why change is happening, what it will look like and how it will benefit the stakeholders. It helps to ensure the change is conducted safely and in an environmentally responsible manner. Keeping employees informed from the start helps smooth the transition and increase the chances of success.

Change management involves:

- routine change: a preauthorised change that is low risk, common, and follows a procedure or work instruction (e.g. the routine replacement of worn bearings)
- emergency change: a change that must be implemented as soon as possible (e.g. electrical switchgear taken out of service following an incident).
- significant change: any change that's not a standard or emergency change (e.g. changing the cargo or product that is normally stored in a warehouse)
- temporary change: a change that is limited by time. It is important that, where appropriate, significant risks introduced by a temporary change are treated with the same rigour as for a permanent change

Among the categories above, this guidance is most relevant to “emergency change”, significant change” and “temporary change”. Peel Ports plans to build on the introduction of the standard in 2020/21 and embed its application across the group.

	Target Title	Owner	Due Date
Target #25	Training in the MoC process will be provided to approvers to promote consistency and improvement.	Ron Hunter	31 Mar 2022
Target #26	Group EHS will include MoC in its annual compliance audits including checking on the adequacy and consistency of MoC records and change registers.	Ron Hunter	31 Mar 2022



10. AUDIT AND REVIEW OF EHS

Establishing an EHS Governance Committee, led by the Chief Executive, provided the ideal forum for reviewing the status of the organisation with respect to legal compliance, the delivery of our strategic plans and the promotion of good practice.

The HSE states “Larger public and private sector organisations should have formal procedures for auditing and reporting health and safety performance. The senior management team should ensure that audits are perceived as a positive management and boardroom tools. Various codes and guides (many of them sector specific) are available to help organisations report health and safety performance and risk management as part of good governance”.

This year, we will integrate environmental topics into the existing health and safety audit programme to monitor the adoption and understanding of group environmental standards across our ports.

To audit effectively, there must be objective standards to reference. Compliance with legal requirements is one such reference, another is the company’s own policies and procedures and a third is presented by internationally recognised health and safety management systems (e.g. ISO14001 and ISO45001).

Over the course of the year, internal and external audits will also be progressed in support of demonstrating compliance with these references. This will deliver a comprehensive audit framework which will continue to be developed as a key component of our continual improvement strategy.

	Target Title	Owner	Due Date
Target #27	Integrate environment topics into the health and safety audit programme.	Alex Pepper	30 Jun 2021
Target #28	Prepare a Group wide EHS audit plan for 2021/22.	Ron Hunter	30 Jun 2021
Target #29	Deliver minimum of 12 EHS compliance audits at port and terminal level and present findings to the Governance Committee.	Ron Hunter	31 Jan 2022
Target #30	Ensure that ports and terminals prepare an improvement plan and action tracker to respond to EHS audit findings.	Ron Hunter	31 Mar 2022



11. ENVIRONMENTAL MANAGEMENT

Our Enviro365 Strategy

In 2020/21 we implemented the following changes in support of our Enviro365 strategy:

- Developed 10 new environment-based standards
- Moved our documents onto SharePoint Online
- Developed a number of toolbox talks and checklists
- Created an Environment Newsletter circulated internally to staff
- Reported to the EHS Governance Meeting on a monthly basis, providing key updates and tracking our environmental reporting
- Undertook a review of our main energy consuming operations and developed a list of opportunities for further investigation
- Worked with Royal Haskoning consultants, to better understand our air emission profiles and identify suitable actions

Environmental Management System (EMS)

We recognise the need to bring a clear process and structure to our environmental management programme. We have introduced an Environmental Management System (EMS) based on the traditional management principles of Plan, Do, Check and Act. This cycle ensures we strive to continuously improve our processes through regularly reviewing what we have in place and revisiting materials when required.

Our EMS is based on a clear hierarchy of documents, which mirror the structure of the Group Health and Safety system and naming conventions around:

- Policies
- Golden Rules
- Standards
- Procedures

The EMS is consistent with the approach to other group documents and based on the standards of ISO14001. Where ports or terminals have their own EMS or accredited system, those systems continue to be run alongside the group documents and complement one another. Many of our sites already have excellent local documents and procedures and where appropriate, these may form the foundation of future group standards.

Enviro365 Golden Rules

The Enviro365 Golden Rules launched during 2020, creating a simple set of rules for environmental management on our ports. The understanding of these rules does not require training or expertise, they establish clear environmental standards to be followed.

ENVIRO 365 GOLDEN RULES

Peel Ports is committed to managing its operations in a way that minimises its impact on the environment. We will do this by creating environmental standards in our Environmental Management System which will apply to all operations. We will also ask our employees and contractors to have regard to the environment in all that they do.

The Golden Rules have been created to explain the high-level principles that will form part of our environmental standards.



DO ACT RESPONSIBLY

We all have a role to play in ensuring our operations have as little impact as possible on the environment.



DO NOT POLLUTE

Ensure that your operation is not causing unnecessary pollution, to land, water or the air. If something is leaking report it.



DO NOT WASTE ENERGY

If it is safe to do so, switch off items that are not in use. Think about conveyors, monitors, shed lighting and engine idling.



DO REDUCE AIR EMISSIONS

Do not allow equipment to unnecessarily idle. Can you operate in a way that is more efficient?



DO RE-USE & RECYCLE

Place your waste in the correct bins and re-use containers and bottles where possible.



DO NOT LITTER

Ensure items are disposed of correctly and that they cannot cause pollution.



DO NOT CAUSE UNNECESSARY NOISE

Noise pollution can affect the surrounding environment, turn off equipment as soon as the operation has finished.



DO FOLLOW THE RULES & PROCESSES

Our standards have been created to protect both our operations and the environment.



DO REPORT ENVIRONMENTAL INCIDENTS

If you spot something that doesn't look right - raise an alert straight away and then report it using Sphera.



DO NOT TRAVEL UNNECESSARILY

Could you safely walk, car share or Skype?

These rules are applicable across all the Peel Ports locations and operations and summarise the environmental minimum standards that must always be observed by employees, contractors and all other port users.

Please ensure you adhere to all Environment 365 rules

Targets for 2021/22

To support the delivery of our Enviro365 programme, we have identified around 40 environmental targets for 2021/22. These are a mix of quantitative and qualitative targets in support of the Enviro365 programme. These targets show the direction and focus of the company and communicate what we aim to achieve by the end of the financial year.

We have identified 40 environment targets for the year to March 2022. It is an ambitious programme covering a broad range of subjects at a high-level and creating the foundations for future continual improvement. These build on last year's programme adding detail and support mechanisms.

Environmental Reporting

In common with health and safety management, the importance of reporting environmental incidents and near misses is unquestioned. Analysis of Sphera incidents is already helping us to recognise trends, understand root causes and prevent environmental damage.

We have a Group Standard on Reporting Environment Incidents and we have developed promotional materials that can be used locally to increase awareness. We will continue to promote reporting of environmental issues across the Group and use the analysis of reports to target areas of focus.

Last year, we received 608 environmentally themed reports (incidents, near misses or hazard observations). These were broadly categorised as shown below. We have used this analysis to help shape our thinking and to prioritise areas of work.



Total: 608 Environment Reports

Resource Consumption

Within the UK, Peel Ports plays a significant role, facilitating the movement of essential goods through its ports. Shipping is often cited as one of the greenest methods of transport, per tonne manoeuvred. Allowing goods to be delivered close to their final destination reduces road miles and associated air pollution.

In providing these facilities and services, Peel Ports is naturally a consumer of energy and resources. The management of these resources is important to minimise the impact we have on the environment as well as ensuring we are managing our cost base efficiently.

We have introduced a Resource Management Policy (Appendix I) which will help us to focus on the management of resources as well as our journey to decarbonise and innovate in the ports sector.

See also the section on “**Decarbonisation & Resource Management**” for more details.



Environmental Management Priorities

Good environmental management is simply good management. Many of the port industry's environmental priorities fit 'hand in glove' with managing a responsible and profitable business. For this reason, environmental management should be fully integrated with key business processes (e.g. procurement and investment) and not seen as a separate consideration.

Port Directors are responsible for overseeing relevant activities on their sites, following Group policy and standards.

Training, Awareness and Understanding

Over the past year we have been working to raise the awareness of environmental priorities across the Group. We aim to better understand our environmental impacts so that we can target effective means of reducing those impacts.

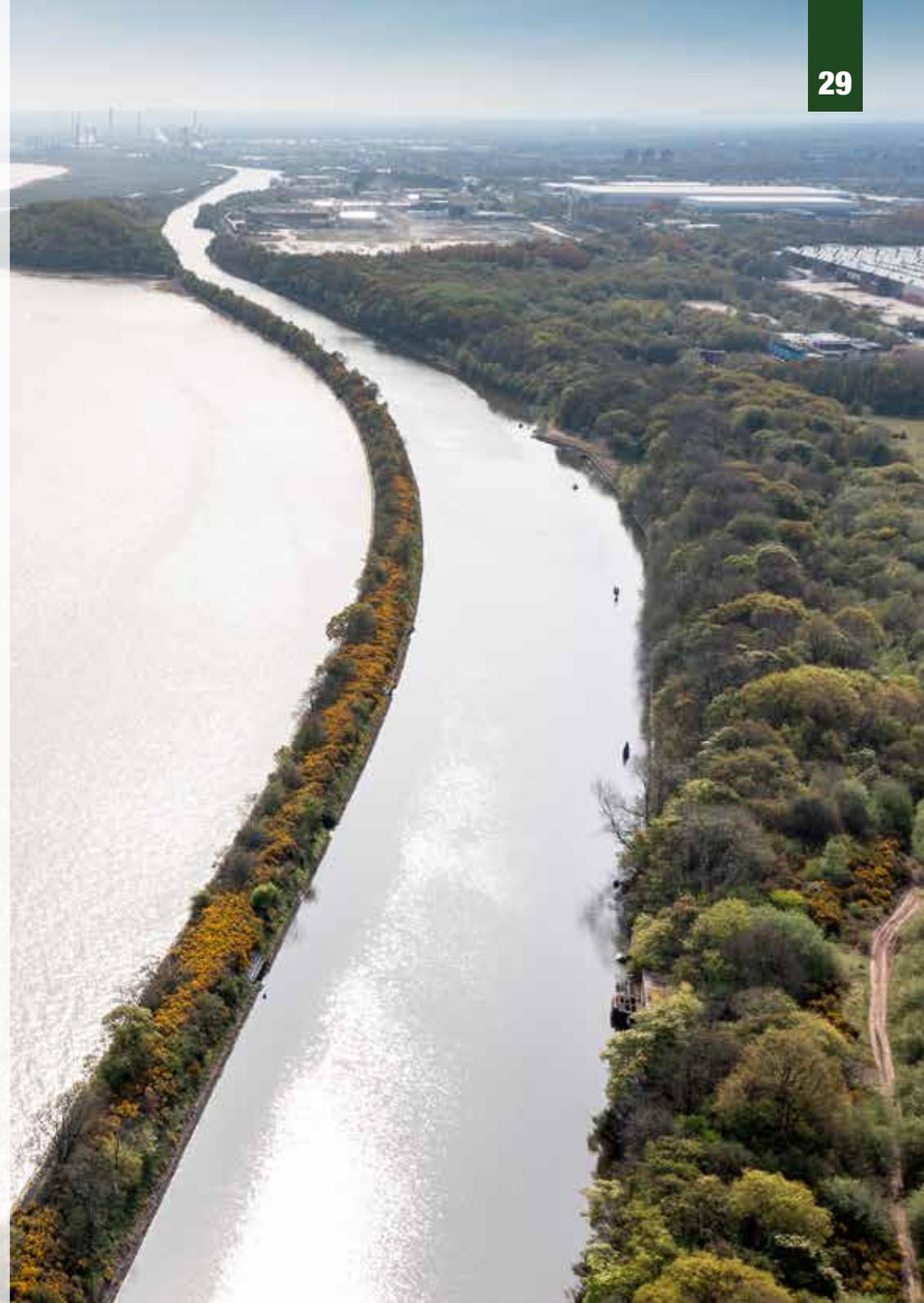
We have been developing our environmental culture in the business by adapting policies, providing training resources and reviewing procedures. In doing so, we can be confident our operations will run safely and efficiently with minimum impact on the environment.

In addition to acting responsibly across our operations, we aim to promote good environmental awareness and practice among our employees. We will continue to make information and resources widely available and encourage effective behavioural changes that can apply to home and working environments.

Consideration will be given to how we may adapt our working environment to help our employees embrace a lower impact lifestyle. We will maintain an effective environmental narrative, seeking opportunities to include environmental priorities in our messaging.

We will encourage our teams to consider how they may support their local environments e.g. volunteering for environmental projects or complementary environmental activities that can also promote teambuilding.

	Target Title	Owner	Due Date
Target #31	Create at least 2 training modules on the LMS, focused on environmental awareness and other areas of improvement.	Archie McCluskey	31 Mar 2022
Target #32	Promote the membership of IEMA to group environment leads and support CPD routes to Practitioner Membership.	Alex Pepper	30 Sep 2021



Greater Consistency

Over time, we will deliver a consistent approach to environmental management across our ports and terminals. This will give us confidence that our ports and terminals are managed to a high standard.

Last year, we started to build a comprehensive suite of environmental standards to support our Group Environment Policy (Appendix III). These standards were developed with the support of colleagues across the business, particularly those with certified environmental management systems.

Work will continue to identify and develop new standards as required on environmental priorities. A consistent environmental narrative will be delivered to all new starters and contractors as part of their company induction.

	Target Title	Owner	Due Date
Target #33	Develop tools to assist adherence to group standards, including toolbox talks, checklists and sharing of best practice.	Archie McCluskey	31 Dec 2021
Target #34	Each site shall prepare their own environment plans, following the group template and guidance.	Port Directors	31 May 2021

Policies and Procedures

Last year, we published our first Group Environment Plan and released 10 environmental standards to support our Group Environment Policy (Appendix III). These standards summarise the requirements of relevant legislation and advise on the adoption of best practice supporting compliance on our sites.

We produced additional supporting materials, where needed. These guide our sites towards the measures available that support high standards, including checklists and pre-populated registers. This year we will be adding selected subjects to our Group EHS audits to verify compliance.

We will expand our library of subjects where a Group standard is needed to help improve our environmental management. We are committed to continually reviewing our standards with respect to changing legislation and documenting good practice.



DO FOLLOW THE RULES & PROCESSES

Our standards have been created to protect both our operations and the environment.



Air Quality

Shipping remains one of the most fuel-efficient and sustainable ways to transport goods between countries. Emissions per tonne of cargo are much less than air, road and freight rail operations.

At Peel Ports we understand we have a significant role to play in providing port services to meet the demand for seaborne traffic and in facilitating modal shifts to less carbon intensive methods.

The UK Government published the latest Clean Air Strategy in January 2019, which highlighted the need to reduce the impact of emissions from the Maritime sector. The Clean Maritime Plan was released in July 2019 to chart the way forward to deliver the Government's goal, part of which included a request from the Department for Transport (DfT) for English ports above one million tonnes per annum to publish a Port Air Quality Strategy (PAQS).

Peel Ports responded to this request from DfT by engaging consultants Royal Haskoning to assist with the production of a baseline emissions inventory for our English ports.

The PAQS provides a corporate position and a basis for each site to understand their emissions and develop action plans. Through a combination of local and corporate actions, we will seek opportunities to reduce emissions of air pollutants at each location. Corporate measures outlined in the PAQS will be considered for relevant ports and terminals.

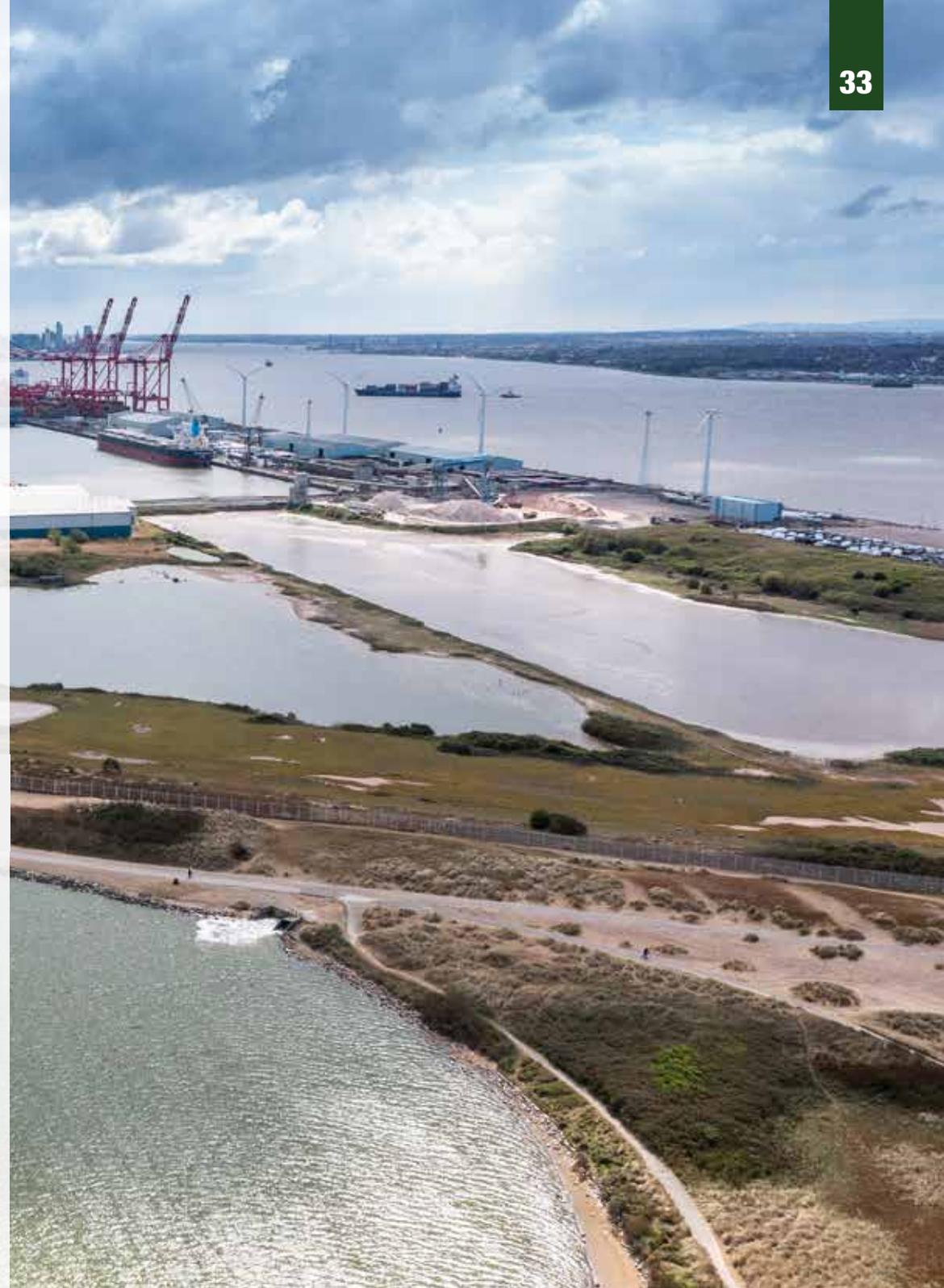
One of our Enviro365 Golden Rules is related to air quality and how we may minimise emissions. This Golden Rule is applicable to many of our operations and particularly relevant to the consumption of resources and Peel Ports procurement choices.



DO REDUCE AIR EMISSIONS

Do not allow equipment to unnecessarily idle.
Can you operate in a way that is more efficient?

	Target Title	Owner	Due Date
Target #35	Progress corporate actions identified in the Group Air Quality Strategy document.	Alex Pepper	31 Mar 2022
Target #36	Ports shall identify and progress local air quality actions as part of their site EHS plan.	Port Directors	31 Mar 2022
Target #37	We will develop a forum for Air Quality discussions to share opportunities, projects and best practice.	Alex Pepper	31 Jul 2021



Climate Change

Climate change presents one of the greatest international challenges.

It is clear that weather patterns are changing as a result of climate change; the environment in which we operate is changing too. Whether it is more extreme weather events, localised flooding, sea-level rise or warmer summers, we can be certain that these changes will impact our operations.

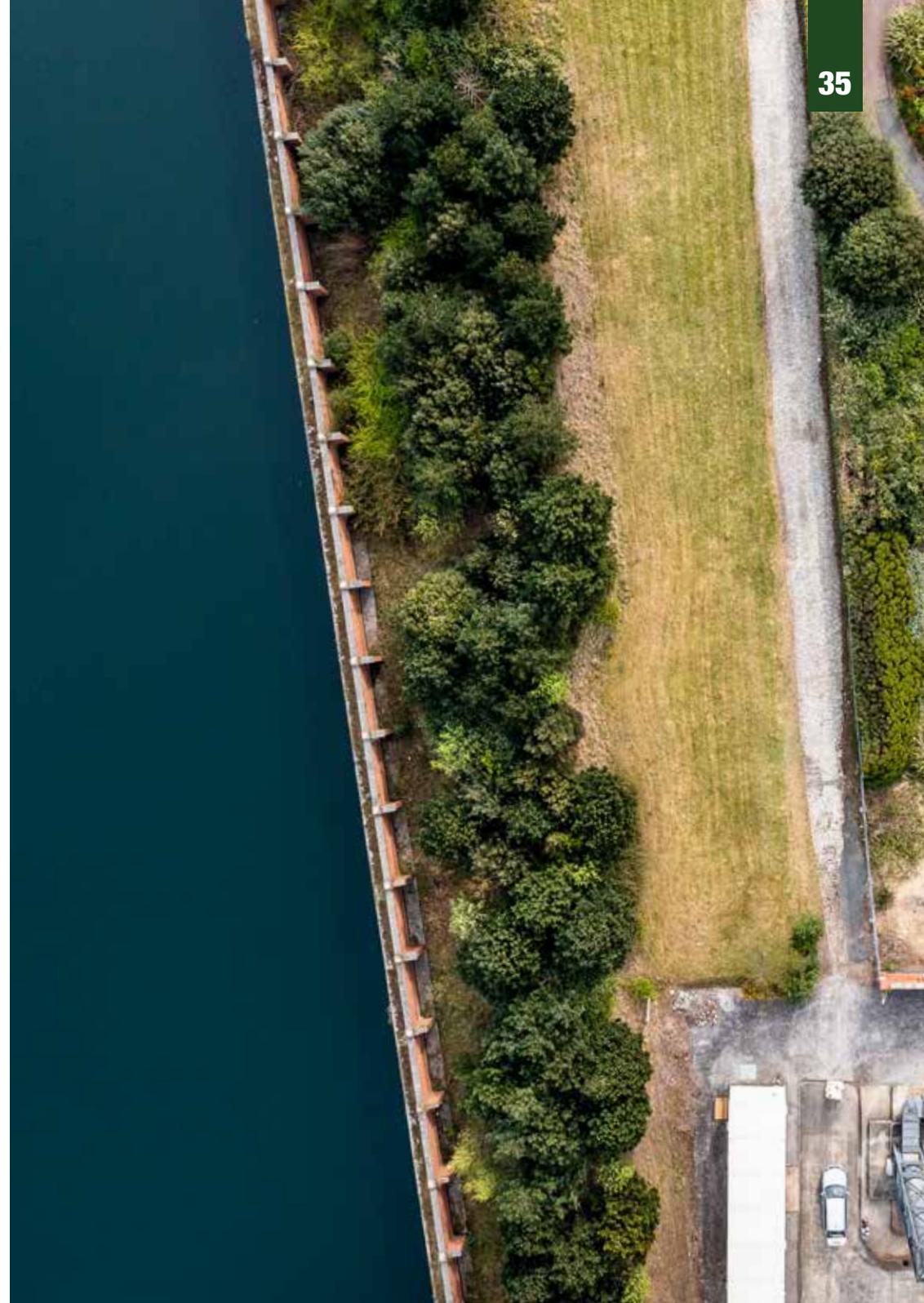
Climate change projections give a range of scenarios of how climate change may impact over the short, medium and long term. As an infrastructure owner and operator, it is important that we consider these projections and plan for resilience. It is particularly important that we future-proof our investments to withstand the changes predicted for asset lifecycles.

In January 2020 our Marine team arranged a workshop to consider climate change projections and the threats and opportunities that climate change may bring. A further workshop was held later in the year and a Climate Change Policy (Appendix II) was developed. A Steering Group was formed to embed the policy within Peel Ports over the coming year.

The Steering Group will consider mitigation and adaptation and develop clear strategies. On climate change adaptation, Liverpool and Sheerness ports participated in the DEFRA Climate Change Adaptation reporting in 2012. We have been invited to contribute again and will submit a further report by the end of 2021.

Our operations consume fuel and energy which have associated greenhouse gas emissions. We will work to set an emissions reduction target which is informed by a review of our greenhouse gas emission levels and consistent with UK reduction targets (see also the section on Decarbonisation & Resource Management for further information).

	Target Title	Owner	Due Date
Target #38	Undertake targeted climate change risk assessments for our ports and terminals.	Climate Change Steering Group and Port Directors	31 Mar 2022
Target #39	Participate in the third round of DEFRA's climate change adaptation project for Liverpool and Sheerness and extend reporting to other sites.	Climate Change Steering Group and Port Directors	31 Dec 2021



Decarbonisation and Resource Management

Major industrial port operations naturally consume large amounts of energy. This ranges from the fuel we use to operate mobile plant to the electricity we use to heat offices. Given that energy has a cost and also a carbon footprint, it is important that we use it responsibly and conserve energy where we can. That is why we made energy conservation one of our Golden Rules.



DO NOT WASTE ENERGY

If it is safe to do so, switch off items that are not in use. Think about conveyors, monitors, shed lighting and engine idling.

Peel Ports Resource Management Policy (Appendix I) sets out key principles that will apply to resource usage.

In early 2021 the Power BI energy usage dashboard was introduced. This interactive reporting tool allows users to monitor and analyse their energy consumption. With access to better data and a greater understanding of our energy use and costs, we can make informed decisions about when and how we use energy. Throughout 2021 this will be developed further to integrate more datasets giving users more details of their consumption.

In addition to the Resource Management Policy, the resource opportunities database has been developed using Energy Savings Opportunity Scheme (ESOS) recommendations. The purpose of this document is to have a centralised database holding all energy saving opportunities for the Group. This document will allow ports to plan future capital projects, monitor progress with ongoing projects, identify new opportunities and share best practice.

Decarbonisation

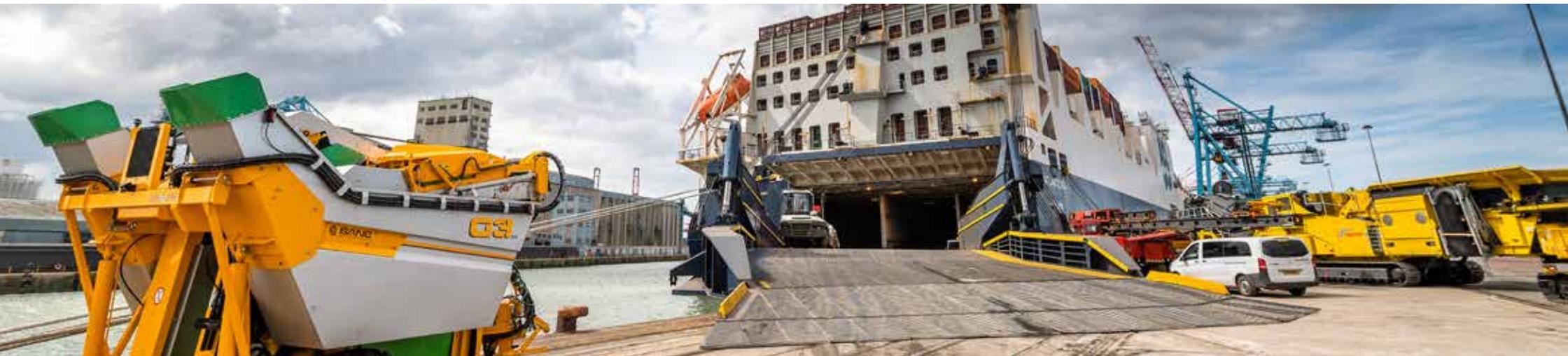
In September 2019, the UK set the target of “net zero by 2050”. Discussions are underway about adopting an interim 2035 target.

Although ports and shipping make up a relatively small proportion of UK greenhouse gas emissions, we have an important role to play to rise to the decarbonisation challenge.

We will continue to explore how alternative fuels such as ammonia and hydrogen may be used in the future. We will also consider how renewable energy generation such as solar (photovoltaic), wind and hydroelectric power can potentially play a part in reducing our greenhouse gas emissions.

Shore-side power, which allows vessels to turn off their engines and plug into an electrical grid whilst berthed, could have an important role to play in reducing emissions and improving air quality. Work to explore shore-side power opportunities throughout the Group is continuing, with feasibility studies being undertaken where appropriate.

	Target Title	Owner	Due Date
Target #40	Undertake a site review examining the potential for the provision of shoreside power facilities and develop an action plan.	Stuart Walls	31 Dec 2021
Target #41	Embed the use of the Opportunities Database and ensure there are appropriate processes in place for its ongoing use.	Stuart Walls	30 Sep 2021
Target #42	Develop a Peel Ports decarbonisation strategy.	Alex Pepper and Stuart Walls	31 Dec 2021



Drainage

Ports occupy a strategically important location on the land/sea interface. In terms of drainage this often means our sites drain directly to a watercourse or the sea, rather than to a public sewer.

Where our drainage discharges are consented by environmental regulators, it is important that we manage them in line with consent requirements. Some of our activities have the potential to release pollution into the drainage infrastructure and we often have silt traps or interceptors to capture these potential pollutants. Where we have additional drainage infrastructure, it is important that this is maintained in line with the manufacturer's guidance and appropriate to usage.

By effectively managing and maintaining our drainage infrastructure, we will protect our sites from localised flooding (which could interrupt operations or damage cargo) and ensure that our rainwater and runoff is treated appropriately before being discharged to watercourses.

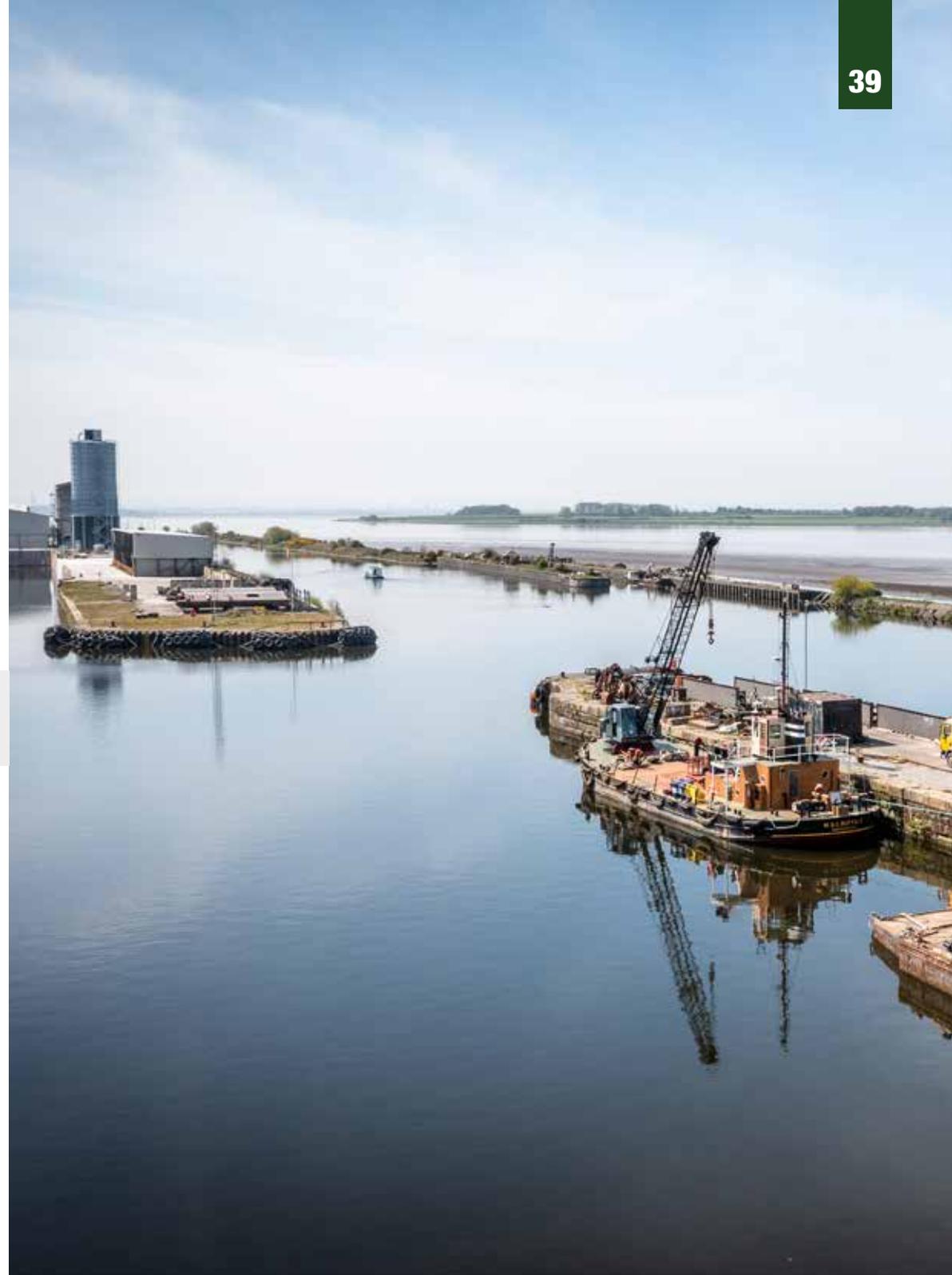
The Group Drainage Standard outlines our obligations regarding drainage management, including permitting, maintenance and additional infrastructure, such as silt traps and oil interceptors. One of our Enviro365 Golden Rules is related to preventing pollution. It is important that we inform our staff about local drainage infrastructure so they can take appropriate action to protect surface water drains.



DO NOT POLLUTE

Ensure that your operation is not causing unnecessary pollution, to land, water or the air. If something is leaking report it.

	Target Title	Owner	Due Date
Target #43	Establish a project to refresh Drainage Management Plans (Group Standard "POL 350 PPG HSE"). Record the means by which drainage systems will be assessed, managed and maintained.	Port Directors	31 Mar 2022
Target #44	Develop materials for ports and terminals to support the implementation of the standard for drainage management.	Alex Pepper	30 Sep 2021



Environmental Incident Reporting and Response

Reporting environmental incidents, as with any type of incident, is key to understanding what happened, why it happened and how it can be prevented from happening again. It also supports the identification of priorities that may need further guidance or training.

Reporting environmental incidents is one of our Enviro365 Golden Rules.

We use Sphera for capturing all types of reports, including environmental hazard observations, near misses and incidents. We have gained good traction using Sphera over the last year for environmental reporting, making the best use of an already familiar tool.

During the past year, we raised awareness and understanding of what environmental incidents are and how to report them through publication of the Group Standard on Reporting Environmental Incidents. This was supplemented by a toolbox talk detailing what to report and how to report it. Since we started raising awareness in FY21, the number of environmental incident reports has risen to 176 over 12 months, compared to 54 incidents the previous year.

The Sphera process ensures that all reports are reviewed and where necessary investigations are conducted, to identify the root cause and opportunities to prevent a re-occurrence. On a monthly basis, we categorise reports in Sphera with an environmental aspect and assign report types. This analysis is reported to the EHS Governance Committee, where trends are shown of environmental reports by site.

Analysing and categorising report trends helps to prepare materials that educate and guide our sites on opportunities for prevention and improvement.

We aim to refine our incident analyses and automate them via enhancements to EHS reporting and the transition to SAP.



DO REPORT ENVIRONMENTAL INCIDENTS

If you spot something that doesn't look right - raise an alert straight away and then report it using Sphera.

	Target Title	Owner	Due Date
Target #45	Develop our Environment Reporting capabilities and seek opportunities to transfer analyses to Power BI.	Archie McCluskey	31 Mar 2022



Environmental Permitting

Peel Ports recognises the importance of securing and maintaining all appropriate environmental permits (this may include consents, licences and process exemptions) for our operations. Where we have permits, we need to understand and comply with each permit requirement.

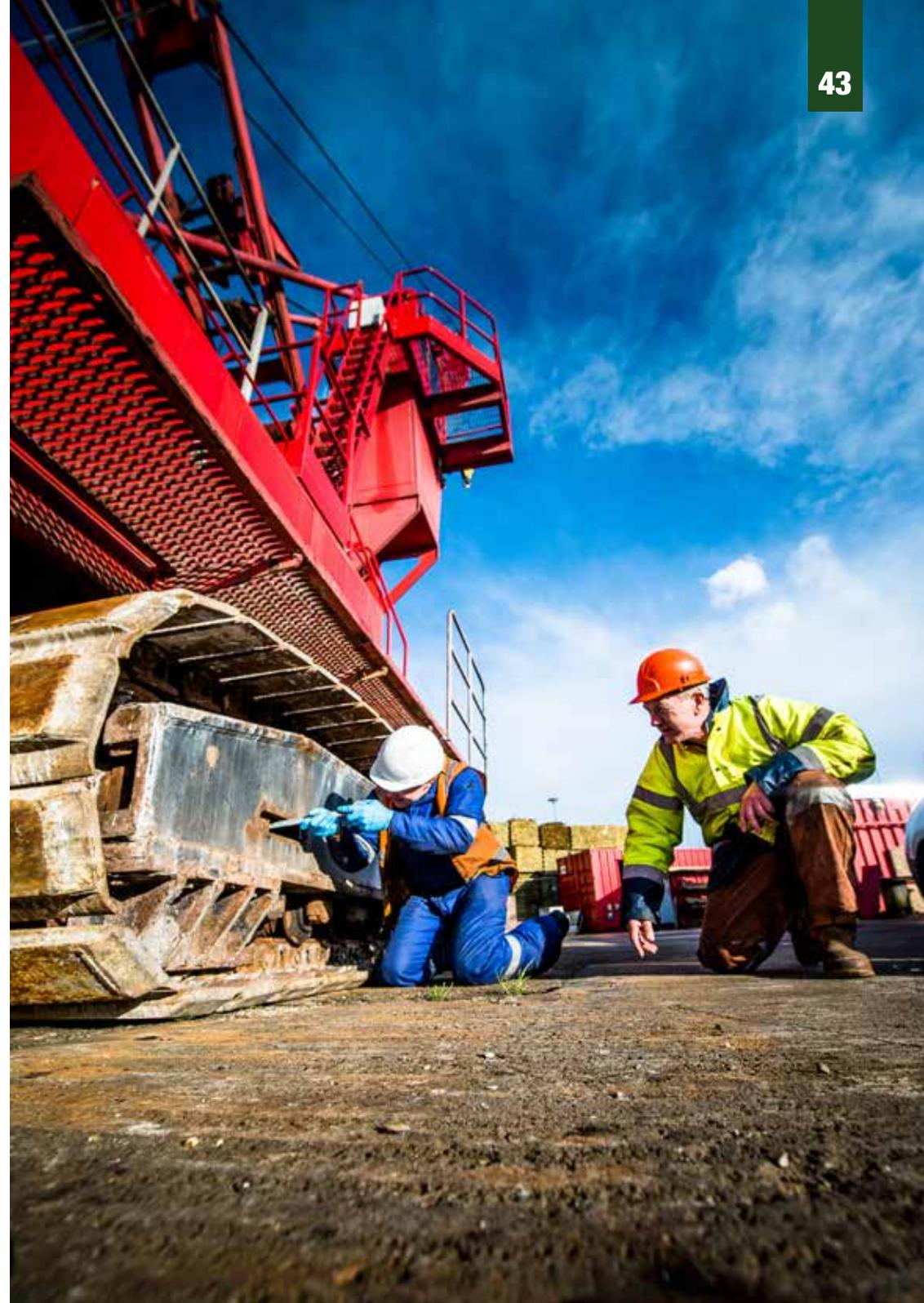
Permits and their conditions/controls are established to ensure that we manage our operations in a legally compliant manner and minimise risks to the environment. Failure to comply with a permit could lead to the permit being revoked, disruption to operations, harm to the environment and potentially, a fine or prosecution.

As a responsible operator Peel Ports will ensure that we manage our operations in line with permit conditions and industry best practice. All environmental permits will be logged in a Group permit register and standards will be put in place to ensure that these permits are owned and managed by responsible persons.

All new operations and developments will be reviewed to ensure the permitting landscape is understood and any required permits/consents are identified at an early stage. It should be noted that many of our tenants and partners will operate under their own environmental permits (further information is presented in the Property & Land Management section of this document).

We will be auditing compliance with permits held and our Group standards during the coming year.

	Target Title	Owner	Due Date
Target #46	Sites will complete the annual review of Environment Permits.	Port Directors	31 May 2021
Target #47	Group Environment will review the annual returns and store relevant details on SharePoint.	Alex Pepper and Archie McCluskey	30 Jun 2021
Target #48	Develop criteria for auditing Environmental Permits and include them in the next round of EHS audits.	Alex Pepper and Archie McCluskey	31 Oct 2021
Target #49	Create guidance for our commercial teams on how environmental permitting should be considered when considering new enquiries.	Alex Pepper and Archie McCluskey	30 Sep 2021



Fuels and Chemicals

As a major operator of industrial plant and equipment, we use and store various fuels and chemicals. Many of these items will be subject to a COSHH (Control of Substances Hazardous to Health) assessment and will have documented controls to ensure that they are stored and used safely.

From an environmental perspective there are also regulations that apply to the storage of fuels and chemicals to ensure that the environment is protected from the risk of leaks and spills.

Oil Storage

The Control of Pollution (Oil Storage) Regulations 2001 (and the equivalent regulations in Scotland and Ireland) detail legal requirements for storing oils, fuels, solvents, lubricants and other oil-based products. They include requirements relating to the use of storage containers and specific requirements for bunding, protection and maintenance. It is important that staff understand these requirements and comply with the regulations.

Peel Ports introduced a Group Standard on the Storage of Fuels and Chemicals to promote a common approach to managing these assets. We also developed a fuel tank register for all fuel and chemicals where we receive deliveries or have responsibility for tank maintenance.

This register is stored on SharePoint and will be updated when new tanks are introduced or decommissioned. We plan to link maintenance routines with our tank checklists, so that the condition of each tank can be monitored, and maintenance conducted to maintain compliance.

Environmental reports concerning fuel and chemical storage are among the most common. Over the coming year, we will consider further how we respond to these reports and what equipment and training is needed to deal effectively with landside spills.

Polychlorinated Biphenyls (PCBs)

PCBs are a specific type of oil that is governed by legislation due to their environmental toxicity. PCBs may be present in transformer oils, capacitors, vacuum pumps and other systems.

PCBs are banned from use in new equipment, but still can be present in legacy equipment, some of which require registration with the appropriate regulatory authority. By the end of 2025, holders must remove any remaining PCBs via a responsible, licensed disposal route.

Working to the requirements of the Group PCB Standard, our site leads will create a plan to manage these assets in accordance with legal obligations. The first stage is knowing which assets fall within the legislation and their PCB concentration. Our registers for these assets will be stored on SharePoint, providing the appropriate references for staff.

Fluorinated Gases (F-gases)

“F-Gases” are a group of fluorinated greenhouse gases that have a damaging impact on the environment and a high global warming potential if released. The use of these gases is therefore tightly controlled, and they must be disposed of responsibly by authorised persons.

F-gases are commonly found in refrigeration equipment, air-conditioning systems, switchgear and heat pumps that could be found on our sites.

It is important that we manage our F-gas assets in accordance with all associated requirements and to look at more environmentally friendly options when considering new and existing assets.

As with PCBs, a Group register of assets is being developed to make it clear what the asset is and how we intend to manage it, including information on frequency of leak checks. F-gas leads at each site will be responsible for meeting our Group Standard on the responsible management of F-gases.

	Target Title	Owner	Due Date
Target #50	Develop a central register of fuel tanks to be linked to inspection routines for each tank.	Alex Pepper and Archie McCluskey	30 Nov 2021
Target #51	Create a central repository for PCB registers. Sites with assets containing PCBs will create a plan to remove the PCBs from site before the end of 2025.	Alex Pepper, Archie McCluskey and PCB Leads	30 Nov 2021
Target #52	Create a central repository for F-gas registers.	Archie McCluskey	30 Nov 2021
Target #53	Develop a F-gases briefing note for the supply chain team, so that they may take appropriate actions.	Archie McCluskey	30 Sep 2021

Nature, Wildlife and Habitats Conservation

Located in key strategic locations. They also have a substantial landholding which we manage and maintain. Many of our sites are on or adjacent to areas of high conservation value and it is important that we understand the environments in which we operate.

Environmental Designations

Whilst ports are industrial sites, they often create space for nature as they are large, secure and public access is often limited. Our port facilities can therefore provide a haven for certain species due to the reduced disturbance.

We published a Group Standard on Biodiversity & Conservation which outlined site obligations on the subjects of protected species, invasive non-native species and natural designations. We included a summary of these obligations in a toolbox talk and produced maps of each site to visualise natural designations in relation to property boundaries, which can be relevant to permitting requirements for certain activities.

In addition, we have encouraged sites to look at conservation and biodiversity more generally, identifying areas where we may enhance biodiversity and to consider working with local conservation groups to further the interests of all parties.

	Target Title	Owner	Due Date
Target #54	Promote the use of GIS mapping to help our sites to understand their local designations.	Archie McCluskey	31 Mar 2022
Target #55	Develop materials to help sites identify and manage invasive non-native plants.	Archie McCluskey	31 Dec 2021



Port Development

Some of our ports and maritime connections have hundreds of years of history. Our vision to create sustainable environments, where people and businesses can flourish, has cemented us as an organisation that changes thinking, shapes the future and transforms industries and lives.

Ports in the last 100 years have been transformed, as the world has adapted to the changes in shipping, and our ability to transport goods. Gone are a lot of manual processes, and in their place, infrastructure and technology have been developed to support shipping in a safe and efficient manner.

As we look forward, we can see that ports will continue to be vital hubs for the movement of goods. The challenges ahead mean that our customers, cargoes and ways of working will continue to evolve. New low carbon fuels and cargoes will become a more significant part of our business and our sites and customers will adapt to these changing needs.

Many ports have “Permitted Development Rights” for activities that do not need approval through the planning system. We have been given these rights to support operations and to allow us to accommodate the changing needs of our customers. For example, these rights could allow us to construct a warehouse (of a certain size) for handling port cargoes or to change the internal road network. Our planning team work closely with the local planning authorities to ensure that we use Permitted Development Rights in full compliance with all legal requirements.

For our larger sites we have engaged in the Port Master Planning process and produced port plans. These plans are consulted on with the local stakeholders and help to co-ordinate medium-term planning. These plans clearly set out our strategic intentions over the medium to long term (in excess of 20 years) and help to inform port users, employees and local communities as to how our ports may develop.

For port developments we carefully consider each one, examining relevant planning and environmental considerations. For larger projects, or projects that may have an environmental impact, we work with the relevant authorities and progress Screening and Scoping studies to establish whether an Environmental Impact Assessment is required and what it needs to include; also whether the requirements of the Habitats Directive are relevant.

New developments will seek to incorporate the best technologies and to minimise environmental impacts wherever possible. Examples of this include warehousing where we recently installed the latest in lighting technology and controls. This helps to ensure that lighting is low energy and only used when needed.

For some sites there is potential to build on existing natural assets, developing, conserving and enhancing biodiversity. Considering these subjects from the outset helps to consider innovative design proposals. Examples include site designs that make use of existing trees for screening and shading, using natural barriers for internal site boundaries and preserving green space for use as drainage management areas.

We have adopted a Sustainable Procurement Policy which apply to our procurement and capital investment plans. This policy will help to ensure we consider all options at a time when we have the opportunity to influence change. To achieve this, we are considering further guidance and standards on sustainable design criteria.



Property and Land Management

Our ports are home to a diverse variety of operations including many that are leased to tenants, some of whom are our customers or suppliers. We promote close working relationships with these stakeholders with the aim of supporting a strong port community.

Many tenants operate their own facilities and are significant employers in their own right. They are responsible for obtaining and maintaining relevant permits and consents.

As a landlord we protect our property via the terms of our leases and the processes we follow prior to and following occupancy. We have reviewed our processes for onboarding new tenants, including a review of the standard clauses covering environmental issues within leases.

Our onboarding process ensures we have a good understanding of proposed activities and have appropriate requirements in the lease. We also require that tenants notify us of any changes, particularly if additional or revised permits are required.

Land Management

We are also responsible for non-operational land holdings and marine interests (seabeds, some islands and intertidal areas). This property estate is documented through our SAP system and integrated with GIS mapping tools. We are continually improving the quality of this information and working with other departments to ensure we have accurate records of land holdings and responsibilities.

We carefully examine our land holdings and at the point of any development, we undertake site investigations to ensure that we know what the works will entail. Many developments result in industrial sites being remediated and brought back into a new use, such as the redevelopment of the former Thames Steel plant at Sheerness which included a plan for addressing environmental sensitivities.

We will review our processes in the coming year and consider the need for a standard process and permit to break ground. This will cover the smaller maintenance type works that may fall outside of the Group Projects management processes.

	Target Title	Owner	Due Date
Target #56	Raise awareness and understanding of the new Tenant Interface Policy	Mark Robinson	30 Sep 2021
Target #57	Consider the need to develop a process for dealing with fly-tipped materials.	Alex Pepper and Mark Robinson	31 Jan 2022
Target #58	Review with sites the known status and understanding of invasive species on our landholdings.	Alex Pepper and Group Property	28 Feb 2022



Purchasing and Capital Investment

Our procurement and capital investment programmes offer many opportunities to reduce our environmental impacts.

What we buy has a direct relationship on what we consume and ultimately generate as waste. Whilst examining the whole-life cost of a purchase, we can also consider running and disposal costs and environmental impacts.

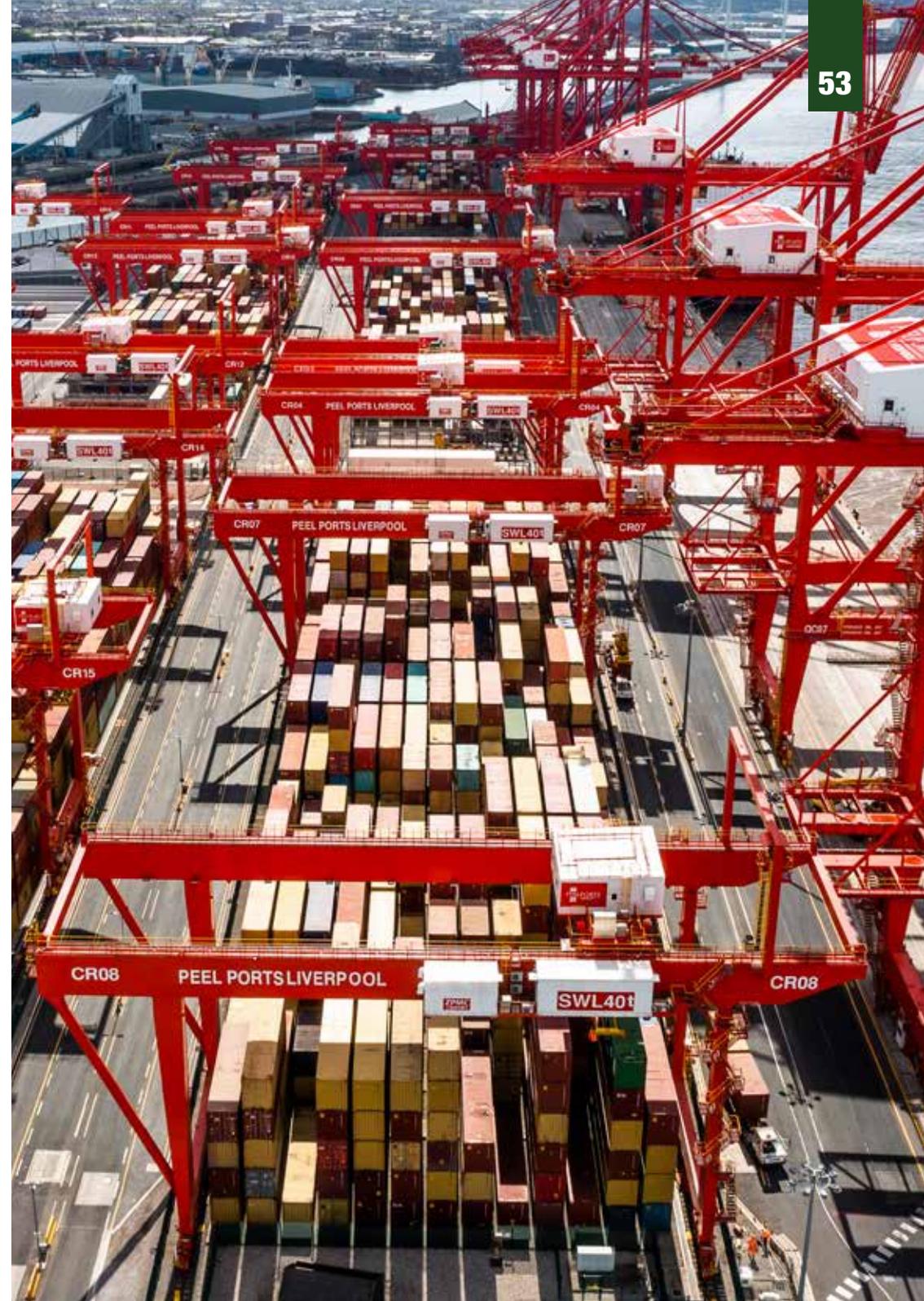
We have introduced a Sustainable Procurement Policy to help us select suppliers, goods and services. We have also introduced a Supplier Code of Conduct which includes a requirement for suppliers to have clear procedures in place to ensure that direct and indirect environmental impacts associated with the goods and services they supply are understood, measured and managed.

Suppliers are also asked to commit to Peel Ports social and environmental aims and objectives. We will be working with new and established suppliers, to encourage them to sign-up to our code of conduct.

Our capital investment programme makes investments for the long term. The decisions we make can have an impact on our operations for many years. It is therefore important that we design-in efficiencies (best available technologies, controls etc.) from the start of a project.

We will review our current processes to ensure that we consider sustainable development principles and the environmental impacts of our operations.

	Target Title	Owner	Due Date
Target #59	Target 60% of our supply base (by spend) signed up to the Supplier Code of Conduct.	James Riddick	30 Sep 2021
Target #60	Work with the Supply Chain Sustainability School to achieve a Silver standard in procurement and sustainability across the Peel Ports Group.	James Riddick	31 Jan 2022
Target #61	Develop Sustainable Design Criteria for projects.	James Riddick, Stuart Walls and John McCormack	31 Dec 2021



Relationships with The Local Community

Peel Ports recognises that our sites form part of the local community and are local employers. We are also community neighbours and our operations must be well-managed and our external impacts (noise, dust etc) minimised wherever practicable.

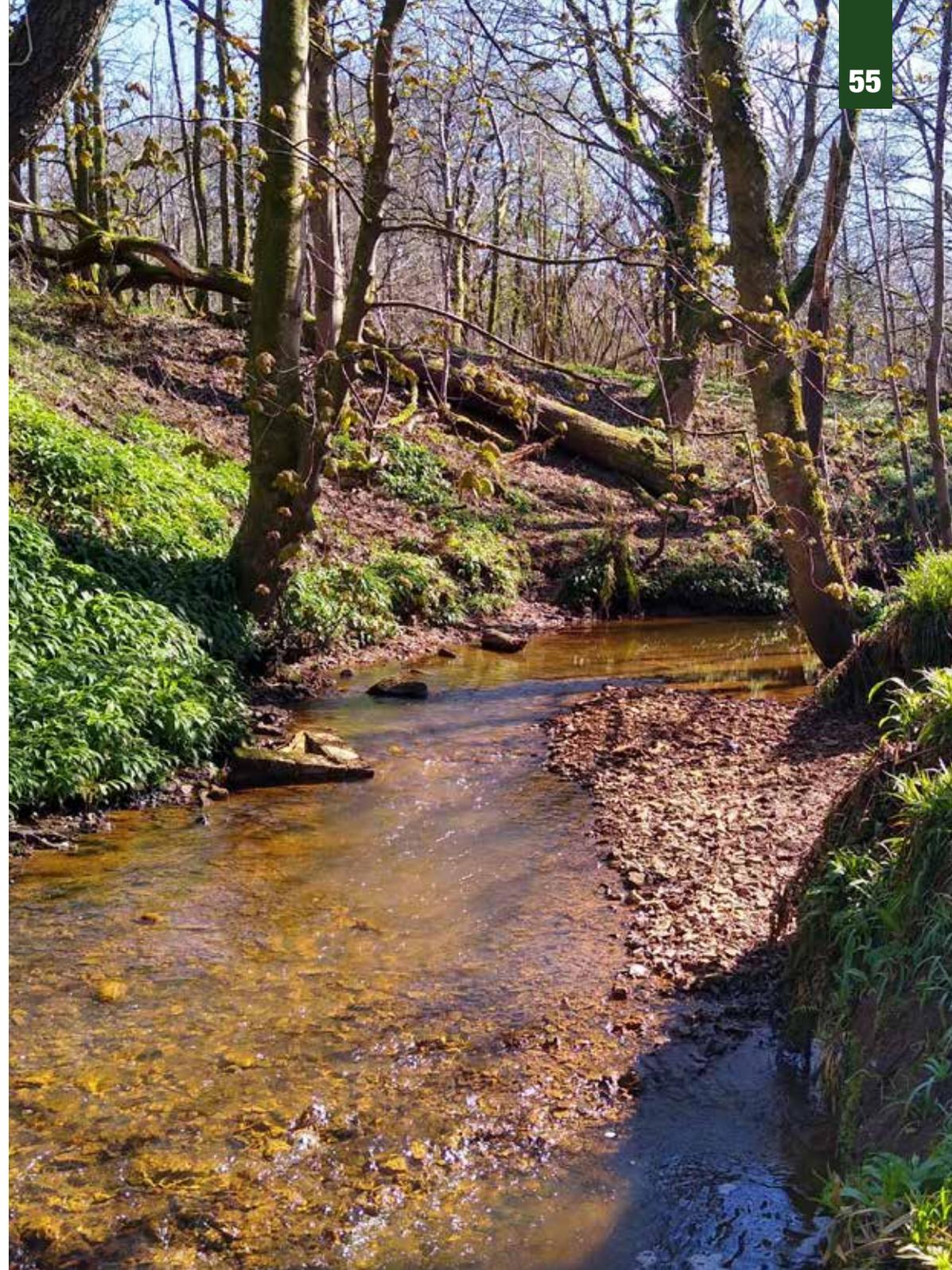
By their nature, ports are busy sites, handling the transit of goods and services. As a responsible operator it is important that we manage these operations such that we minimise impacts on local communities. There are many of examples of how this is managed via established procedures. We review these procedures regularly and aim to continually improve our approach.

In some instances, our activities may prompt complaints from the local community. We have published Group Standards on Environmental Noise Management and on Handling Environmental Nuisance Complaints. These describe the means by which we manage these incidents.

These standards, with supporting worksheets, cover our processes for investigating complaints and support the identification of opportunities to reduce our impacts. Often a complaint is found to be caused by a change in our operations which may be short-term e.g. local infrastructure works. In other instances, we may be able to change or adapt our operations to reduce the impact.

For larger sites we have engaged in the Port Master Planning process. Local stakeholders are consulted to assist with the preparation and coordination of plans. These communicate our strategy and help to inform port users, employees and local communities about planned developments.

	Target Title	Owner	Due Date
Target #62	Raise awareness of recording community nuisance complaints in our reporting systems so they can be appropriately managed.	Alex Pepper	31 Oct 2021
Target #63	Develop a training module, to be hosted on Peel Ports Learning Management System advising employees on the management of nuisance complaints.	Archie McCluskey	31 Dec 2021



Risk Assessment and Pollution Prevention

In order to manage environmental and compliance risks, we must have a good understanding of relevant environmental legislation and its requirements. This includes for example, regulations that cover waste, oil storage, drainage and species protection.

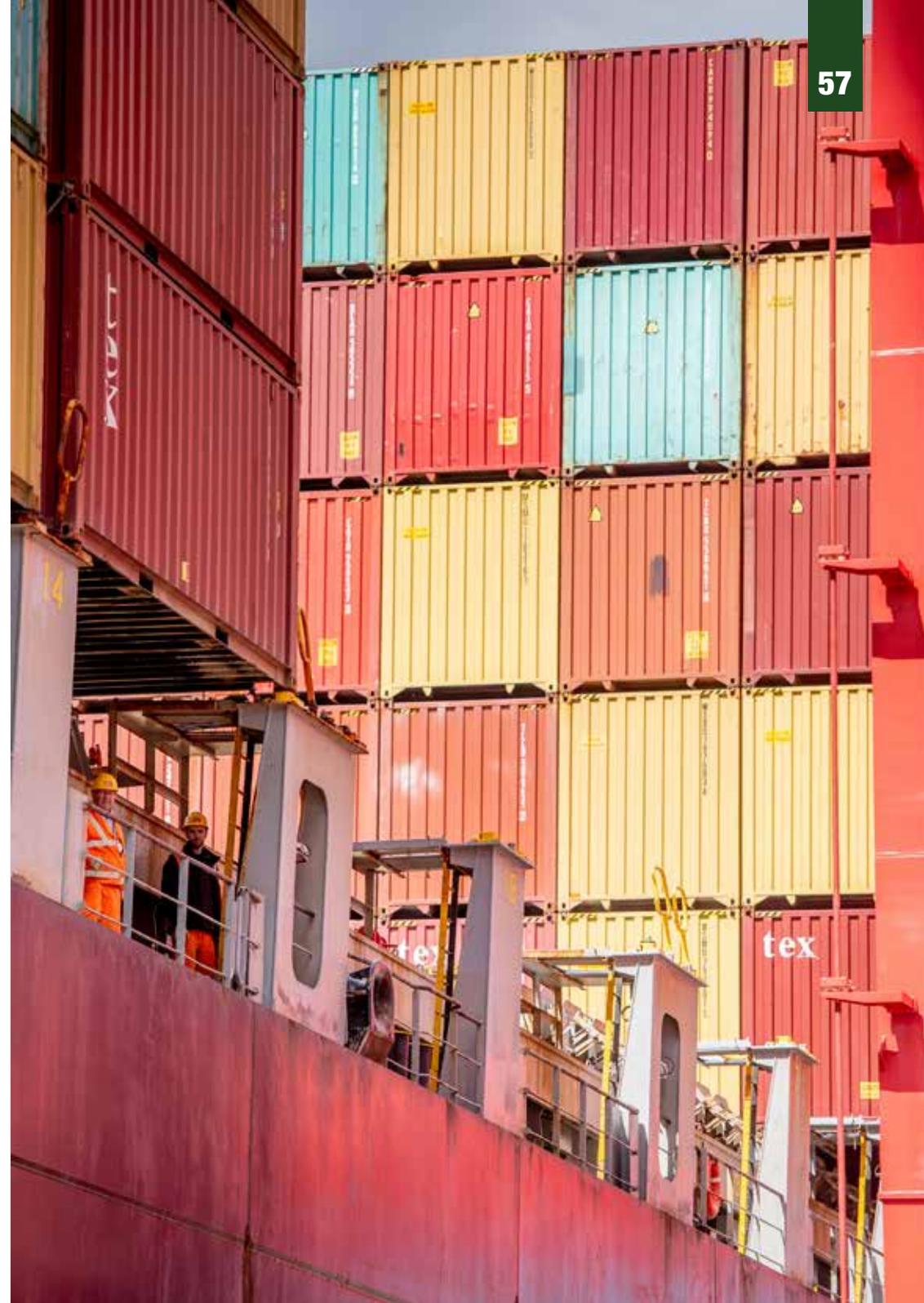
Failure to comply with environmental regulations poses risks to the business of reputational damage, fines, operational disruption and in some cases can result in prosecution of the company or employees. In many cases the regulations make a breach a criminal offence.

We continue to develop our Group Environmental Standards to address compliance with environmental legislation. Where we identify a requirement for a new or improved standard, we introduce it to our improvement plans.

We have developed an environmental legal register and will be supported by an external compliance monitoring service to maintain a customised inventory of environmental legislation. This service offers legislation updates, notifications on relevant subjects and provides briefing documents on key subjects. We will also populate our SharePoint site with information to help employees access the legal register and relevant information.

Last year we reviewed our approach to environment risk assessment. We have committed to developing our risk matrix to bring in environmental rating criteria. We have also agreed to rollout Environmental Aspect Registers for our sites, which is in line with the requirements of ISO14001.

	Target Title	Owner	Due Date
Target #64	Review the EHS risk rating criteria and develop an appropriate matrix for environmental issues.	Alex Pepper and Archie McCluskey	30 Jun 2021
Target #65	Develop a process for managing the environment legal register and monitoring compliance requirements.	Archie McCluskey	31 Jul 2021
Target #66	Create a group template for sites/terminals to develop an Environmental Aspect Register, including supporting guidance on aspects and impacts.	Alex Pepper	30 Sep 2021



Sustainable Asset Management

Our plant and equipment are core to port operations. These allow our ports to function in a safe and sustainable manner whilst facilitating the movement of a wide variety of cargoes.

A key aspect of our business concerns the operation of mobile plant including tugs, forklifts, cranes and shipping container handlers. Increased awareness and understanding of climate change are helping to drive the identification of risks and opportunities associated with management of these mobile assets. This leads to a shift in thought processes across the investment chain, affecting the risks, returns and value for our customers and our business.

The management of mobile assets is key to ensuring they are appropriately utilised. We have established monitoring systems and telematics which assist with vehicle tracking and ensures they are operating safely and efficiently. This data helps us influence fleet usage and patterns of operator behaviour, such as unnecessary engine idling.

We will continue to monitor innovation in the ports sector and the emergence of greener fuels, so that we can transition our fleet and reduce our carbon footprint over time.

	Target Title	Owner	Due Date
Target #67	Explore the opportunity and potential environmental benefits of alternative fuels for current fossil fuelled mobile plant.	Malcolm Oliver-White	31 Dec 2021
Target #68	Create a strategy for the future of our mobile plant, including fuel sources and decarbonisation.	Malcolm Oliver-White and Stuart Walls	31 Dec 2021

Waste Management

It is important that we manage all waste streams responsibly. The Environmental Protection Act 1990 imposes a Duty of Care on persons concerned with waste, including producers. We must ensure that our waste is handled, stored and disposed of appropriately by contractors licenced to take the waste, following completion of correct documentation by both parties. As well as fulfilling our duty of care responsibilities, we also must comply with the UK waste regulations. Since 2015 it has been a requirement for businesses to separate recyclable materials (primarily paper, plastic and glass) from other waste.

We have developed a Group Standard on Landside Waste Management which includes the adoption of the waste hierarchy of Reduce, Reuse, Recycle, Recover, Dispose. Our sites will use this hierarchy when reviewing their waste strategies and take appropriate action. Legal obligations and best practice are described within the Group standard. Support materials have also been developed (checklists and toolbox talks) to assist the sites in complying with our standards.

Last year, issues surrounding waste management were the most frequently reported environmental topic. We will continue to work with sites to understand opportunities for reducing the number of waste reports. This may involve considering the source of litter and waste on site and what can be done to prevent inappropriate disposal.

Two Enviro365 Golden Rules relate to waste and highlight behaviours that will help us manage our waste streams responsibly.



DO RE-USE & RECYCLE

Place your waste in the correct bins and re-use containers and bottles where possible.



DO NOT LITTER

Ensure items are disposed of correctly and that they cannot cause pollution.

	Target Title	Owner	Due Date
Target #69	Develop a process for sites/terminals to report on the amount of waste collected on a monthly basis.	Alex Pepper and Chris Ingham	31 May 2021
Target #70	Sites will review waste streams with regards to the waste hierarchy and seek opportunities to reduce waste and facilitate recycling and recovery.	Port Directors	30 Nov 2021

12. HEALTH AND SAFETY MANAGEMENT

Approach to Health and Safety Planning

The Health and Safety Executive (HSE) and the Institute of Directors (IoD) have published guidance for the effective leadership of health and safety. It is designed for use by all directors, governors, trustees, officers and their equivalents. The guidance states, "Failure to include health and safety as a key business risk in management decisions can have catastrophic results. Many high-profile safety cases over the years have been rooted in failures of leadership".

Health and safety law places duties on organisations and Directors can be personally liable when these duties are breached. Peel Ports Directors have both collective and individual responsibility for recognising and effectively mitigating health and safety risks.

The approach taken during the development of the Group Health and Safety Plan has followed this guidance promoting a 'plan, do, check, act' philosophy in line with the majority of recognised management system approaches including the new international standard for Occupational Health and Safety, ISO45001.

The Group EHS Governance Committee provides the ideal forum to demonstrate the desired level of corporate oversight, planning and review. The participation of Governance Committee members in VFL tours provides the 'visible leadership' recommended in the guidance.

Protecting the health and safety of employees or members of the public who may be affected by Peel Ports' activities is an essential part of risk management and will be led by the Group EHS Governance Committee.



Performance 2020/21

Leading Indicators

Peel Ports employs a number of leading indicators to record our proactive investments in injury prevention. These include Visible Felt Leadership (VFL) tours, hazard reports, near-misses and internal audits.

Attention to leading indicators was greatly aided by the launch of the Sphera reporting system in May 2018. Any incident (leading or lagging) can be conveniently reported online or via the mobile app. Increasing use of the Sphera toolset has helped to increase the number of reports.

During 2020/21 colleagues reported 7183 hazard reports (an increase of 60%), conducted 3855 VFL tours (a new record) and reported 135 near misses. These reports have no doubt helped to prevent injury and ill-health among staff.

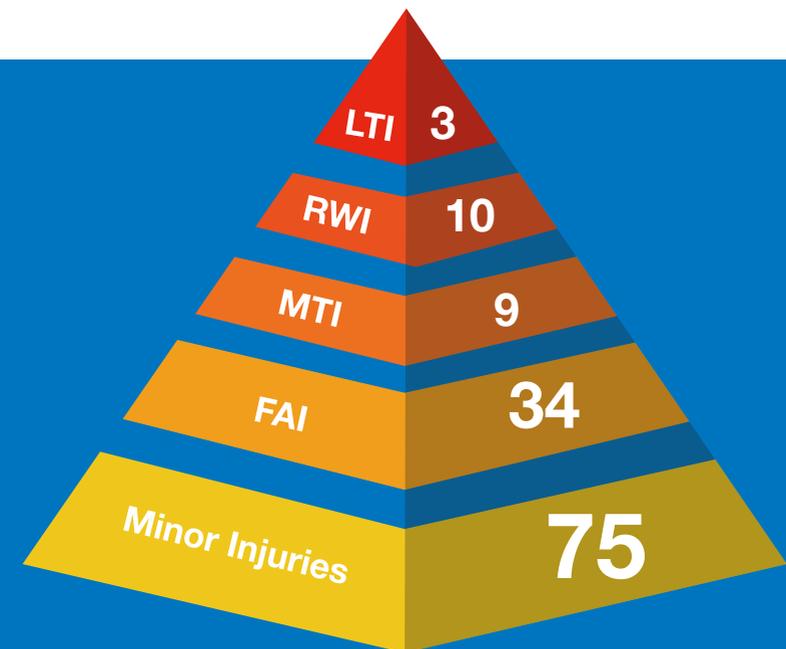
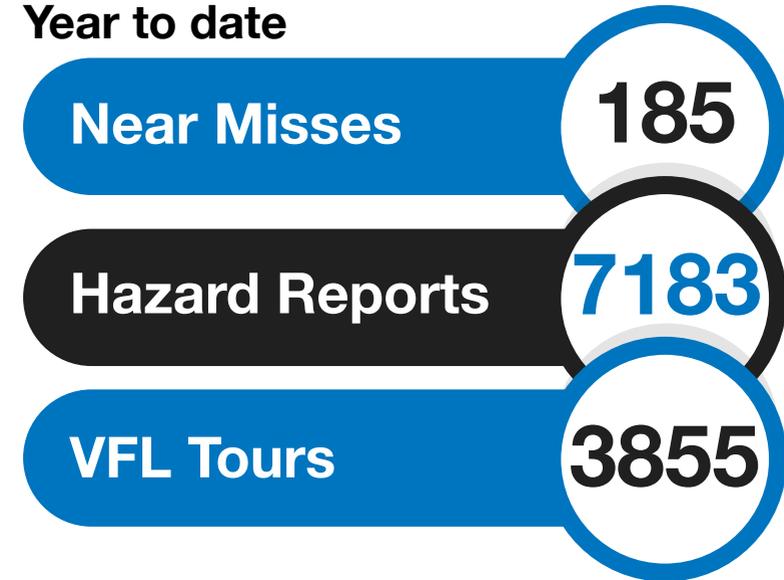
Lagging Indicators

Lagging indicators are the “acid test” for reporting a company’s progress in health and safety management as they point to the frequency and severity of injury and ill-health.

Peel Ports recorded 3 one-day lost time injuries during 2020/21, a record low for the Group and the lowest injury frequency for the major UK ports.

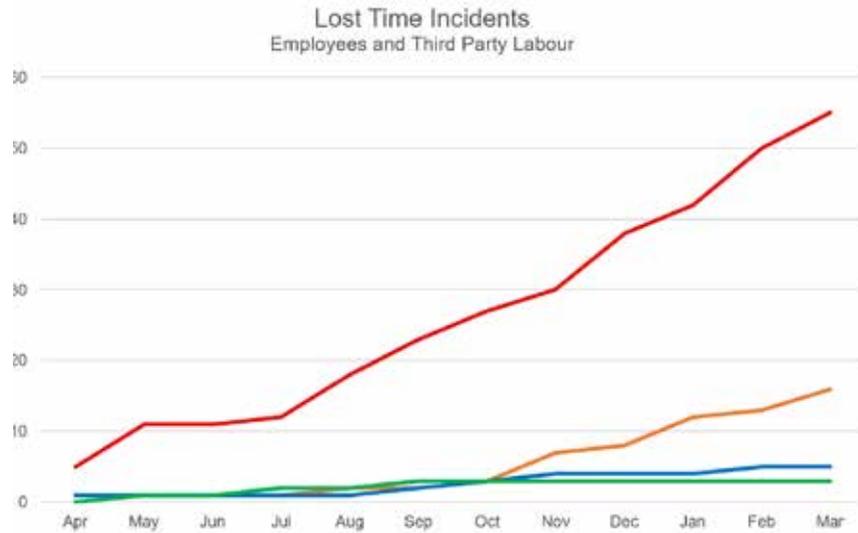
Our ‘incident’ triangle for 2020/21 has a good shape but the number of minor injuries is still relatively low for a company of our size suggesting that minor injuries are often unreported. Increased attention in this area will help us identify and deal with sources of harm – the next injury may not be so minor.

Year to date



Year on Year Improvement

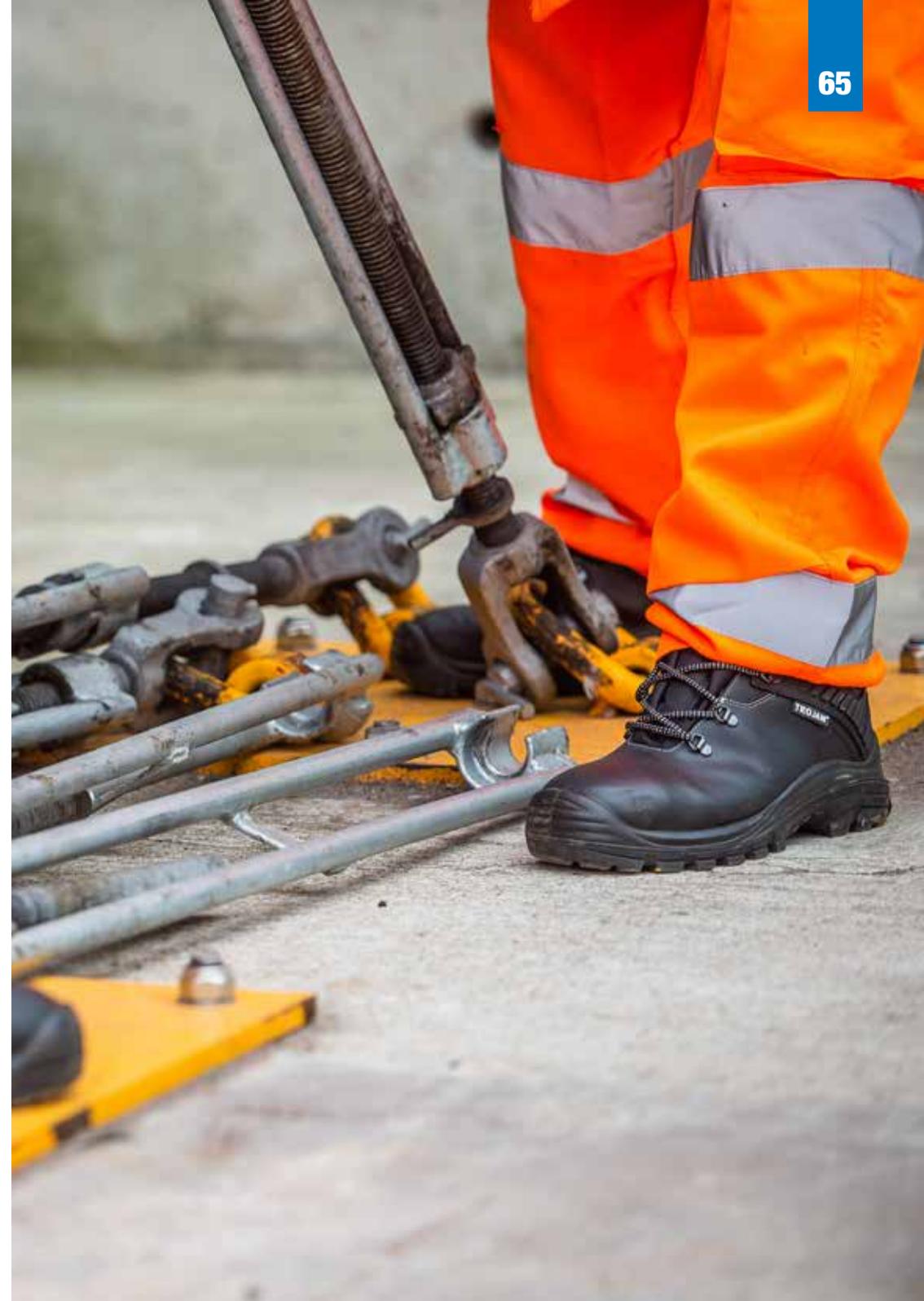
All staff deserve to be congratulated for delivering more than a 90% reduction in significant injuries over three years. Sustained improvement on this scale is testament to your efforts to keep colleagues safe from all causes of harm.



You can play your part by keeping your eyes and ears open and intervening whenever you see something that may not be safe. Speak up and you may prevent an injury. You would hope for the same consideration from others. Report all hazards and near misses in Sphera.

If you lead a team, make sure they understand your expectations for safe working, every day. Your safety leadership will be the single most important factor that ensures your team returns home to their families safe and well.

This is a significant responsibility that rests with supervisors at every level.



Port Cluster Targets For 2021/22

This section sets out the key strategic targets adopted by the Group Environment Health and Safety (EHS) Governance Committee.

In support of the delivery of Peel Ports strategic goals, each port cluster is set a number of targets as set out below. This year, as a direct result of our continued improvement in safety management, it has become clear that the low number of LTIs currently reported by our ports, means that it is no longer the appropriate measure to monitor performance.

A wider metric is required and going forward we will expand our measure to include a broader range of injury events combining Lost Time Incidents (LTIs), Restricted Workday Injuries (RWIs) and Medical treatment Injuries (MTIs).

These will be measured by a new key performance indicator (KPI) known as “Total Recordable Injury Rate, (TRIR)”.

$$\text{TRIR} = \frac{(\text{LTIs} + \text{RWIs} + \text{MTIs})}{100,000 \text{ hours}}$$

We divide the total number of injuries by 100,000 hours because this is approximately the number of hours a typical employee would work in a lifetime. So, a TRIR of 1.0 means that the rate of injury is equivalent to one for each worker during their career.

	Target Title	Owner	Due Date
Target #71	Peel Ports will adopt Total Recordable Injury Rate (TRIR) as its primary lagging indicator. This allows a broader range of injury types to be tracked.	Mark Whitworth	1 Apr 2021
Target #72	Deliver reduction (to 0.55) in cluster Total Recordable Injury Rate. TRIR = (LTIs +RWIs + MTIs) / 100,000 hours.	David Huck	31 Mar 2022

We wish to introduce a quality standard to the status and progress of port investigations into safety and environmental incidents. This measure will help to ensure that significant incidents are tracked to a satisfactory and timely conclusion.

	Target Title	Owner	Due Date
Target #73	Ensure TRIR incidents, pollution events, near misses are tracked by Port Directors ensuring timely and appropriate investigation. Group H&S will audit.	Port Directors	31 Mar 2022

Similarly, we are introducing a quality standard for hazard reporting. This will help to ensure that hazard reports are good quality and are addressed in a timely fashion. Please note that this measure includes environmental hazard reports.

	Target Title	Owner	Due Date
Target #74	Ensure “Hazobs” are tracked by Port Directors, ensuring timely closure and feedback to reporter. Group H&S will audit.	Port Directors	31 Mar 2022

Peel Ports is currently delivering a comprehensive environment, health and safety improvement plan agreed by investors, the “EHS Shareholder Plan”. The Board has agreed to verifiably deliver the plan’s requirements across 19 Objectives by March 2022.

	Target Title	Owner	Due Date
Target #75	Deliver EHS Shareholder Plan in full. Also, to satisfy target, relevant cluster must demonstrate improved employee engagement score as indicated by Safety Climate Survey results Q4 FY22.	Port Directors	31 Mar 2022

Peel Ports aims to satisfy all legal requirements as a minimum standard and we will often go considerably further to ensure the safety of our staff. Therefore, our target is to ensure that there are no regulatory enforcement activities that arise from our port operations.

	Target Title	Owner	Due Date
Target #76	Deliver zero enforcement actions by health and safety regulators in the UK and Ireland.	Mark Whitworth	31 Mar 2022

Visible Felt Leadership (VFL)

“HSE recognises the importance that behavioural safety can play in helping avoid accidents and ill-health at work.... up to 80% of accidents are often attributed to human error” (HSE website).

Understanding errors, whether violations, mistakes or lapses and how they combine with other workplace factors is key to improving health and safety management. Peel Ports behavioural safety programme (which we call “Visible Felt Leadership” or VFL) offers practical guidance on instigating a sustainable change in workplace behaviour.

VFL is a key pillar of our safety strategy. Ultimately it is about line managers, at every level, engaging positively with the workforce and exploring opportunities to identify and embed exemplary safety behaviours.

World class standards of safety management can only be attained by delivering a strong safety culture where safety is not a forethought or an afterthought – it is naturally and deeply ingrained in the way that we plan and execute tasks.

“We work safely at Peel Ports; it’s just the way things are done around here”.

Some 400 colleagues have been trained in VFL techniques. They conduct regular safety tours and have played a key role in delivering a 90% reduction in significant injuries (as measured by one-day lost time incidents).

It is often reported that delivering a culture-change in safety management takes around five to seven years. Peel Ports is now four years into its strategy. We remain on track and we are wholly committed to delivering a safe and healthy working environment.

	Target Title	Owner	Due Date
Target #77	Over the financial year, deliver a minimum of six VFL training courses for 50 staff. These may be new delegates or those requiring a refresher course.	Ron Hunter	31 Mar 2022



Safety Leadership Development

During 2021, Peel Ports will launch a new programme which will introduce an integrated programme of safety leadership for supervisors & managers. This will be launched within the Liverpool Container Terminal.

The goal will be to create, communicate & deliver a customised programme of learning & development for supervisors and managers across the port, enhancing skills in effective safety leadership providing context to company processes and tools.

The programme will be delivered by “STC INSISO” who have more than 20 years’ experience in the design and delivery of training in management, health & safety, communication skills and business management.

Attendees from Directors to Supervisors will consider safety leadership, techniques for safety management and effective interventions. The content will be customised by creating learning experiences based upon company specific scenarios and processes, whilst delivering all the required learning outcomes.

	Target Title	Owner	Due Date
Target #78	Deliver a safety leadership intervention from STC for senior members of the Executive Team.	Chris Ingham	30 Sep 2021
Target #79	Progress the safety Leadership Development Programme for managers and supervisors in the Liverpool Container Terminals.	Chris Ingham	30 Nov 2021
Target #80	Review the success of the programme and prepare a report and actions for the Group EHS Governance Committee.	Chris Ingham	31 Dec 2021



Designated Person (Landside)

Peel Ports operates within two independent regimes for the management of safety. The first is often described as ‘landside’ safety which is the traditional health and safety regime with the Health and Safety at Work Act at its foundation and regulated by the Health and Safety Executive (HSE).

This regime does not mandate a national standard for a safety management system, instead companies draft their own systems in compliance with the law and available guidance. Companies may adhere to the ISO45001 standard; however, it is not prescriptive, and compliance is entirely voluntary.

The second regime surrounds the UK’s marine operations and takes a different approach. Marine operations must adhere to the “Port Marine Safety Code (PMSC)” which is a Department for Transport standard, written in consultation with the ports industry. The code was developed to improve safety in UK ports and to enable harbour authorities to manage their marine operations to nationally agreed standards. It provides the framework against which the policies, procedures and the performance of harbour authorities can be measured. It also describes the role of board members, officers and key personnel in relation to safety of navigation and summarises the main statutory duties and powers of harbour authorities.

Naturally, elements of best practice can often be found in both approaches. The PMSC provides for the role of a Designated Person who must be appointed to provide independent assurance concerning the operation of the PMSC and marine safety management system. The designated person plays a key role in monitoring and reviewing compliance via independent audit. Thus, a level of governance and assurance is provided.

Within the coming year, Peel Ports will consider a similar approach for the oversight of landside EHS compliance with relevant legislation.

	Target Title	Owner	Due Date
Target #81	Explore the governance and assurance benefits associated with mirroring the role of the marine Designated Person for landside safety management.	Ron Hunter	31 Dec 2021
Target #82	If appropriate, identify a suitable organisation or individual and make the necessary appointment.	Ron Hunter	31 Mar 2022

Work at Height

The nature of port operations is such that “Work at Height” presents a significant hazard. With the right approach however, all hazards can be controlled, and the safety of employees can be ensured.

Some key examples of Work at Height risks arise from working on board container vessels (some of which have unprotected edges to lower levels), work on top of cargoes (necessary to sling the cargoes for unloading), working from access platforms and work over water. Peel Ports has a “Golden Rule” concerning work at height which requires that all work at height is risk assessed. This reflects a key aspect of relevant legislation the United Kingdom and Ireland.

However, analyses of injury cause in Peel Ports, suggests that the Golden Rule should be reviewed and strengthened to emphasise the company’s requirements and commitment to safe operations.

The new wording will be “DO NOT work at height without a risk assessment and protection from a fall”. To emphasise the point, this will be issued as a “Life Saving Rule”. Thus, we will easily recognise any out of date references to the Golden Rules and ensure they are updated.

	Target Title	Owner	Due Date
Target #83	Establish a work at height action Group to consider any interim steps required to meet the new standard.	Chris Ingham	31 Apr 2021
Target #84	Prepare launch materials with Marketing e.g. replacements for the Golden Rules posters.	Chris Ingham	31 Jul 2021
Target #85	Launch new work at height standard on 1st August 2021.	Chris Ingham	1 Aug 2021

Asbestos Management

Asbestos is a term for a group of naturally occurring minerals made of microscopic fibres. Before its dangers were known, asbestos was often used in buildings for insulation, flooring and roofing and sprayed on ceilings and walls.

Recognising the historical damage that asbestos had caused to workers across many industries, the use of asbestos was banned in the UK in 1999. Buildings constructed before that date will often have asbestos in them. If the asbestos-containing materials inside these buildings remain intact, they pose very little risk. It's only when these materials are damaged or disturbed that tiny asbestos fibres can be released into the air and breathed into the lungs where they can eventually cause harm. The symptoms of asbestos-related disease can take many years – even decades – to appear after the original exposure.

Workers are at higher risk of damage to their lungs if they've been exposed to asbestos in high concentration, for long durations and frequently. There is no safe level of exposure however and so asbestos containing materials (ACMs, and those materials that may contain asbestos) must be carefully managed.

The “Duty to Manage Asbestos” is contained in Regulation 4 of the Control of Asbestos Regulations 2012. The “duty to manage” requires that employers manage the risk from asbestos by:

- finding out if there is asbestos in the premises (or assessing if ACMs are liable to be present and making a presumption that materials contain asbestos, unless there is strong evidence that they do not), its location and what condition it is in;
- making and keeping an up-to-date record of the location and condition of the ACMs or presumed ACMs in the employer's premises;
- assessing the risk from the material;
- preparing a plan that sets out in detail how to manage the risk from this material; taking the steps needed to put the plan into action;
- reviewing and monitoring the plan and the arrangements made to put it in place; and
- setting up a system for providing information on the location and condition of the material to anyone who is liable to work on or disturb it.

Peel Ports is responsible for the safe management of hundreds of buildings across the United Kingdom and Republic of Ireland. Many of these buildings date from before 1999 and a considerable number have historical significance.

It is essential that an appropriate asbestos management regime is implemented and maintained.

To meet the required standards, Peel Ports has adopted a world-class governance approach to the topic of asbestos management.

- New asbestos management standards have been published. These may be found in the Group H&S document suite. A new Asbestos Policy Statement was published, and a refreshed Group Asbestos Management Plan was issued during 2020
- A network of Board-appointed asbestos Duty Holders has been established to assist in the safe management of asbestos and mitigate health risks to staff and contractors.
- Each Duty Holder is trained to the British Occupational Hygiene Society (BOHS) P405 standard for the management of asbestos in buildings.
- The Group Health and Safety Director chairs a quarterly meeting to review the progress of asbestos plans.
- Duty Holders across the group are required to make an annual statement of asbestos assurance to the Board. The first such statements were made in 2019 and new statements were made in November 2020.
- Peel Ports has entered into a national partnership with AEC, one of the UK's leading asbestos consultants and surveyors.

The targets for asbestos management during 2021/22 are as follows:

	Target Title	Owner	Due Date
Target #86	Review the Group Asbestos Policy and Asbestos Management Plan and verify that they remain fit for purpose.	Ron Hunter	31 Mar 2022
Target #87	Progress quarterly Duty Holder governance meetings reviewing the progress of asbestos management planning.	Ron Hunter	31 Mar 2022
Target #88	Ensure that all buildings constructed after 1999 continue to be supported by an asbestos survey unless exempt (e.g. a building secured and unoccupied).	Ron Hunter	31 Mar 2022
Target #89	Deliver annual Duty Holder statements for each port cluster to the Board via the Group EHS Governance Committee.	Ron Hunter	31 Dec 2021
Target #90	Maintain Board Appointments Register for Asbestos Duty Holders and maintain coverage at all ports.	Ron Hunter	31 Mar 2022
Target #91	Ensure integration of AEC asbestos portal and Property Management database (building names and references by the common asset name or number).	Ron Hunter	30 Sep 2021

Fire Risk Management

Employers (and/or building owners or occupiers) must carry out a fire safety risk assessment for occupied buildings and keep it up to date. This shares a similar approach to health and safety risk assessments and can be carried out either as part of an overall risk assessment or as a discrete exercise.

Based on the findings of the assessment, employers need to ensure that adequate and appropriate fire safety measures are in place to minimise the risk of injury or loss of life in the event of a fire. The risk assessment should identify what could cause a fire to start, i.e. sources of ignition (heat or sparks) and substances that burn, and the people who may be at risk. Once the risks have been identified, appropriate action is required to control them. Thereafter, risk assessments should be reviewed regularly.

Historically, Peel Ports has used a variety of approaches to conduct Fire Risk Assessments. A number of formats have been used with some conducted in-house and others outsourced. Over the course of the next 12 months Peel Ports will continue to develop its approach to fire management and maintain a consistent and high standard for Fire Risk Assessment.

	Target Title	Owner	Due Date
Target #92	Review buildings registers to confirm scope of buildings requiring fire risk assessment. Progress gap analysis for all locations.	Ron Hunter	31 Mar 2022
Target #93	Ensure that all relevant buildings have an associated Fire Risk Assessment.	Ron Hunter	31 Mar 2022
Target #94	Deliver annual Duty Holder statements for each port cluster to the Board via the Group EHS Governance Committee.	Ron Hunter	31 Jul 2021
Target #95	Maintain Board Appointments Register for Fire Management Duty Holders and maintain coverage at all ports.	Ron Hunter	31 Mar 2022
Target #96	Complete the population of live links between Group Estates' new building registers and the Group's Fire Risk Assessments.	Ron Hunter	30 Sep 2021



Health and Safety Climate Survey

Health and safety climate surveys (also known as employee engagement or culture surveys) are used to measure employee engagement and perceptions of the working environment. Safety climate describes how people feel about safety and offers insights into an organisation's safety culture.

Safety culture is one of the strongest indicators of organisational health and safety performance. Not only does a positive safety climate have a favourable effect on accident rates, it also supports productivity, reliability, competitiveness and employee morale.

With up to 95% of incidents having a human factor associated with them, many workplaces are choosing to measure their safety climate as a proactive step towards improving their health and safety performance.

The survey results allow managers to gauge the safety maturity of the organisation and helps to determine areas of focus. This leads to an action plan that directly responds to the perceptions of the workforce.

Climate surveys normally comprise an anonymous questionnaire and are structured around key indicators of employee engagement. Using a proprietary tool, allows companies to compare their results with other companies in the same (or other) industrial sectors.

The Health and Safety Executive offers a mature safety climate tool that is widely used in industry. It uses an online questionnaire which explores employees' attitudes and perceptions in key areas of health and safety, namely:

- Organisational commitment
- Health and safety orientated behaviours
- Health and safety trust
- Usability of procedures
- Engagement in health and safety
- Peer group attitude
- Resources for health and safety
- Accident and near miss reporting

When the survey has been completed, it generates a comprehensive report and provides guidance that will help improve the organisation's safety culture. The report can be filtered by demographic, making it a very powerful tool to help target areas that require most attention. The report also highlights areas of good practice.

The ability to break down data for different groups means that managers can identify where the most significant risks lie within the workforce including areas demonstrating most and least engagement.

Peel Ports conducted its first safety climate survey in September 2020 using the HSE Climate Survey tool. In addition to the standard safety questions, Peel Ports added an environment question to take the opportunity to obtain additional feedback for this key area. Our ports have reviewed their responses and are currently delivering improvement plans that respond to staff feedback. To a large extent, these will be completed by September 2021.

At that time, we will progress our second survey and this will assess the progress made in the eyes of employees. Our third survey will be conducted in March 2022.

	Target Title	Owner	Due Date
Target #97	First survey (Sep 2020) submit progress tracker to the Group EHS Director and close out actions.	Port Directors	31 May 2021
Target #98	Second survey (Sep 2021); ensure all staff are invited, encouraged and have the opportunity to complete the second survey.	Port Directors	30 Sep 2021
Target #99	Second survey (Sep 2021); collate and present the results of the second survey to the Governance Team indicating comparisons with the first survey.	Port Directors	30 Oct 2021
Target #100	Second Survey (Sep 2021); prepare an action plan that responds to the principle findings of the second safety climate survey.	Port Directors	30 Nov 2021
Target #101	Third survey (March 2022); ensure all staff are invited, encouraged and have the opportunity to complete the third survey.	Port Directors	28 Feb 2021

Group Electrical Safety Rules (ESRs)

Peel Ports Group Electrical Safety Rules (ESRs) have been implemented across all ports and terminals.

The Electrical Safety Rules for Low Voltage and High Voltage Systems apply to all relevant electrical works carried out on Peel Ports Group premises where the Company has control of the danger, whether the works are authorised, managed, controlled and executed by the Company or are authorised by the Company and are managed, controlled and executed by another organisation.

These Rules form part of the Company Engineering Safety Management System (ESMS) which contains amongst other items, specific Management Procedures and Approved Procedures which relate directly to the application of these rules. The ESMS details the policies, processes, procedures and other documents, which together, form a safety management system based on risk management principles for the safe operation of Low Voltage and High Voltage Systems.

A network of Board Appointments has been made for relevant “Duty Holders” and “Authorised Persons” to formalise roles and responsibilities under the Group Electrical Safety Rules. A Governance Group was established the direction of the Group Health and Safety Director to oversee the management of the rules. The Governance Group meets quarterly.

In 2020/21 each division of Peel Ports is required to conduct a detailed internal audit of ESR compliance and Authorised Engineers are required to make a statement of compliance to the Board.

	Target Title	Owner	Due Date
Target #102	Review and maintain Peel Ports network of Board Appointments and competencies for Electrical Safety Rules.	Ron Hunter	31 Mar 2022
Target #103	Progress quarterly meetings of the ESR Governance Group attended by Authorising Engineers.	Ron Hunter	31 Mar 2022
Target #104	Conduct ESR audits at every location as per the Group ESR audit standard.	Ron Hunter	31 Nov 2022
Target #105	Deliver ESR audit results and Duty Holder compliance statements to the Group EHS Governance Committee.	Ron Hunter	31 Dec 2021



Mobile Plant Safety

Traffic management is a key hazard on ports and one of the principle risks involves the need for separation and segregation of employees on foot. The goal is always to keep pedestrians well away from operating mobile plant.

In a limited number of circumstances, the nature of port operations is such that full segregation can be difficult to achieve, and so careful consideration must be given to alternative controls. Technology solutions are increasingly available including:

- The FTC Pedestrian Detection Camera System. This uses the latest technology to make operators more aware of pedestrians working in the vicinity of materials handling equipment.

With the ability to differentiate between objects and pedestrians, the system is usually installed with one rear facing camera however it can also be integrated to accommodate a front facing camera to help protect pedestrians at the front and rear of the vehicle. The system works by using an algorithm which detects moving and static pedestrians and alerting the operator to the presence of a colleague

- The Briggs “Fleet Aware” system. This uses ultra-wideband (UWB) technology to provide a proximity warning system. Unlike RFID based systems Fleet Aware offers pin-point accuracy in setting proximity zones around hazardous equipment allowing for the detection of personnel. With the capability of programming two distinct 360° detection zones (warning and danger) Fleet Aware can trigger audible and visual alerts to warn operators of the presence of a pedestrian.

Both of these potential technology solutions will be tested in 2021/22.

	Target Title	Owner	Due Date
Target #106	Evaluate the FTC Pedestrian Detection Camera System to enhance the driver's awareness of colleagues who may be working nearby.	Malcolm Oliver-White	31 Oct 2021
Target #107	Appraise the Briggs “Fleet Aware” proximity warning zone system.	Malcolm Oliver-White	30 Sep 2021

Peel Ports Drugs and Alcohol Policy

The Company is committed to promoting the health, safety and well-being of all employees by providing a safe and productive work environment. The aim of the Drug and Alcohol Policy is to ensure that employees are aware of the risks associated with alcohol or drug use or misuse and the potential consequences, including the legal implications, of their actions.

The Company recognises that drug and/or alcohol dependency is an illness and encourages those employees who are experiencing difficulties with substance misuse to seek help and support from the Company.

The inappropriate use of alcohol or drugs can damage the health and well-being of employees and have far-reaching effects on their personal and working lives. In the workplace, alcohol or drug misuse can result in reduced levels of attendance, poor work performance and increased health and safety risks not only for the individual concerned but also for others, such as work colleagues, members of the public, contractors and service users as well as impacting upon the Company's reputation.

Peel Ports policy provides for alcohol and drug testing when considering an employment offer, when a line manager has a reasonable suspicion of a potential breach, following an incident and also on a randomly selected basis.

During 2019, Peel Ports made several significant changes to the policy for the purposes of harmonising the policy as it applies to all staff. The policy's threshold for the failure of an alcohol test reduced from 35 micrograms to 22 micrograms per 100 ml of breath-alcohol concentration. This brought the policy into line with the Scottish road driving limit and the latest Maritime and Coastguard Agency (MCA) guidelines for seafarers.

During 2021/22, Peel Ports is adopting a target across the group for randomly testing a minimum of 10% of employees each year.

	Target Title	Owner	Due Date
Target #108	Ports will conduct random testing, for a minimum of 10% of Peel Ports staff tested prior to Mar 2022.	Port Directors	31 Mar 2022

13. OCCUPATIONAL HEALTH MANAGEMENT

Occupational Health is about the effect of work on health and about ensuring that employees are fit for the work that they are required to do. Services will be provided across all aspects and functions of the Group incorporating;

- the effects of work on health including noise, dust, stress and musculoskeletal issues;
- employee fitness for work including mandatory health surveillance and capability assessments for the varying roles within the port environment;
- the wellbeing of our employees, including the promotion of general health.

If you have any questions surrounding the management of Occupational Health in Peel Ports, please contact the Occupational Health team.

Health Surveillance and Screening

UK and European legislation determine that Health Surveillance must be undertaken where indicated by risk assessment. This is to protect the workforce from health ill-effects such as noise or dust. The aim of health surveillance is to identify the risks, address them and ensure adequate control measures in place remain effective.

Whilst Health Screening is not a legal requirement, it helps to ensure the worker is fit to undertake their role therefore ensuring their wellbeing and safety in the workplace. It is therefore expected that employees, where identified in certain roles, will undertake screening to ensure their suitability to work at night, drive plant, work at height and/or in confined spaces without detriment to themselves or others.

Health Surveillance and Screening are clearly based upon risks identified and the associated risk assessments are underpinned by occupational hygiene monitoring to ensure that the programme is suitable and sufficient to protect colleagues and fulfil legal obligations.

Requirements have been identified on a site basis and set out in a Surveillance and Screening plan which is continually adjusted to meet changing needs. This will facilitate meeting the Occupational Health targets for 2021/22 of a minimum of 95% completion for surveillance and 90% for screening giving some flexibility for long term absences and shift patterns at year end. It is essential that Occupational Health continue to work collaboratively with business functions to ensure these risk assessments are reviewed and adapted where required.

	Target Title	Owner	Due Date
Target #109	Identify hazards and undertake risk assessments underpinned by occupational hygiene monitoring	Port Directors	31 Mar 2022
Target #110	Ensure health screening is undertaken on employees, advising when there have been changes to job roles that affect surveillance & screening requirements	Port Directors	31 Mar 2022
Target #111	Monitor the Health Surveillance and Screening plan for 2021/22 to ensure it meets the requirements identified by risk assessment	Wendy Freeman	31 Mar 2022
Target #112	Quarterly review to ensure occupational hygiene monitoring and associated risk assessment are suitable and sufficient for identifying health surveillance needs	Wendy Freeman, Ron Hunter	Quarterly
Target #113	Complete a minimum of 95% surveillance and 90% of screening across Group.	Wendy Freeman	31 Mar 2022



Promoting Attendance

Occupational Health Advisors support the business by providing objective advice given by qualified and experienced health professionals with a first-hand knowledge of the workplace and work roles.

They are responsible for planning, implementing and evaluating rehabilitation programmes to facilitate a prompt and safe return to work at an appropriate time. They provide clinical advice and liaise with employees, Human Resources and line management in identifying appropriate adjustments to prevent or reduce sickness absence whilst also providing support to those who are unable to work due to ill-health at present.

Occupational Health aims to develop collaborative working between line managers and Human Resources colleagues to support employees with attendance at work. This involves regularly reviewing absences and facilitating tailored vocational rehabilitation programmes that are appropriate to both the employee and the business and promptly addressing health issues to minimise the need for sickness absence wherever possible.

Whilst the company remains committed to supporting employees returning to work following illness or injury, adjustments to role should be temporary, clinically supervised and of short duration. Consultation is also required between Occupational Health, the relevant line manager and the employee. Role adjustments are arranged to support employees returning to work and should not be undertaken when a return to full capability will not take place within a short timeframe.

	Target Title	Owner	Due Date
Target #114	Ensure work-related injuries are referred to Occupational Health where the injured party is unable to undertake their substantive role	Port Directors	31 Mar 2022
Target #115	Work-related ill-health to be referred to Occupational Health urgently via management referral process	Port Directors	31 Mar 2022
Target #116	Weekly Occupational Health review of all amended duties clinically supervised by the Occupational Health Team	Wendy Freeman	Weekly
Target #117	Undertake absence review meetings with HR/ Management Teams	Wendy Freeman	Monthly



Health Promotion

Employees can spend up to 60% of their waking hours at work. There is a positive, proven link between wellbeing and performance and the workplace is an ideal location to promote the benefits of healthy and active lifestyles.

Occupational Health aims to create a culture within the Company to promote a climate and environment where employees can access resources and advice in order to improve their health. It is also our objective to raise awareness to minimise the risk of ill health due to work activities thus reducing absence and the potential impact upon the individual, their families and the organisation.

	Target Title	Owner	Due Date
Target #118	Utilise health surveillance and screening appointments to provide health information relating to risks associated with their roles and personal lifestyle issues.	Wendy Freeman	30 Sept 2021
Target #119	Refresh and maintain the "Health365" Portal for relevant employee information.	Wendy Freeman	31 Dec 2021

Key Performance Indicators

To ensure the Occupational Health Service meets the needs of employees and the Group, continual monitoring and reevaluating the effectiveness of Occupational Health is required through the use of clearly visible key performance indicators:

- Health Surveillance completion of 95% minimum for 2021/22
- Health Screening completion rate of 90% minimum for 2021/22
- Urgent referrals to be responded to within one week
- Long term absence referred to Occupational Health at 28 days
- Report to be submitted to manager with consent within 3 working days of appointment
- Work-related injuries referred by the next working day for assessment
- Adjusted duties to be managed within policy limits

Further information is available from the Occupational Health team

Information on Confidentiality

Occupational Health records including health questionnaires are categorised as medically sensitive under the General Data Protection Act (2018) and is therefore protected as confidential. Occupational Health records can only be accessed by Peel Ports' Occupational Health Team, and by the individual employee in accordance with current Data Protection legislation.

This also includes any information obtained from GPs and specialists with the written consent of the employee under the Access to Medical Reports Act 1988. The only exception to this is where prior written consent has been given by the employee for the information to be disclosed to other named persons.

In interpreting the information, Occupational Health will inform Peel Ports whether the employee is fit for work or not and if any work restrictions should apply but may not disclose any medically confidential information without the employee's prior written consent.

Medical records are held within the Occupational Health Departments at Liverpool and Medway in locked cabinets in rooms that are also locked unless a Practitioner is in attendance.

These files are only accessible by Occupational Health Advisors who are legally bound to confidentiality by the Nursing and Midwifery Council, their governing body, as well as Data Protection legislation. Access to these files will not be granted to any individual outside of Occupational Health without employee consent under any circumstances.

Appendix 1:

RESOURCE MANAGEMENT POLICY

RESOURCE MANAGEMENT POLICY

Purpose

This Resource Management Policy sets out Peel Ports Group's intentions and goals with respect to resource use and management. Its purpose is to help embed efficiency and environmental awareness into everyday business. At Peel Ports we understand that good resource management goes hand in hand with good business. We are therefore committed to delivering good resource management across our group and to use resources in an appropriate and responsible way.

This policy sits alongside our other group policies, including the Group Environmental Policy Statement, which states that we will pursue the responsible and efficient use of natural resources and energy with the view to ensuring sustainability of resources and reduction in carbon emissions. This policy applies to our use of electricity, water and fuels.

It is Peel Ports Group Policy to:

- Plan for our future resource requirements, including options to decarbonise
- Consider energy use and requirements for projects including assessing potential suppliers against the whole life cost of their solutions, including energy and resource use over the life of their assets
- Adopt sustainable design principles
- Make available the information, tools and resources required to undertake energy management to a high standard across the organisation
- Comply with legal and relevant energy and carbon reporting requirements
- Share best practices and encourage action
- Train and empower our employees to use resources efficiently
- Work with our supply chain to encourage the use, development and purchase of energy-efficient plant and equipment
- Understand and benchmark our energy consumption in order to improve performance and efficiency
- Manage and report our energy use and greenhouse gas emissions
- Set reduction targets and to work on projects to deliver agreed targets, projects will be recorded in an Opportunities Database

Commitment

As part of our commitment to good resource management we will look to embed these principles in all that we do across the organisation. Our management teams will be challenged to understand and appropriately manage the resources used in their operations. Our employees will be encouraged to take a positive approach to resource management and to ensure we are using resources efficiently and identifying opportunities to continuously improve. We will review this policy on an annual basis to ensure it remains relevant and fit for purpose for the business.

Mark Whitworth
CEO, Peel Ports Group



Date: April 2021 | Issue 01

Appendix 2:

CLIMATE CHANGE POLICY

CLIMATE CHANGE POLICY

Climate change is recognised as one of the most pressing challenges facing the world today. International commitments have been made, through the United Nations, recognising the threats and challenges posed by climate change and the need for wide ranging international action.

Peel Ports Group recognises the importance of the climate change challenge and the role it can play in responding to it. This includes the need to both adapt to current and future pressures and opportunities that climate change presents to the business, as well as to look at our own contribution with an aim to mitigate this impact. Ports will have a key role to play in decarbonisation as businesses adapt to lower carbon technologies and modes of transport. We believe that ports, as key gateways, will be central to the low carbon economy of the future, supporting the efficient transport of goods and services as well as the development and deployment of renewable technology.

In order to address the challenges posed by climate change, Peel Ports Group will:

- Establish a Climate Change Steering Group to provide focus, visibility and direction on Climate Change issues relevant to our business
- Integrate climate change considerations into the business as a whole, for the purposes of adaptation and mitigation
- Measure and monitor our carbon footprint
- Use natural resources responsibly
- Look for opportunities to decarbonise our operations, including identifying ways to reduce our greenhouse gas emissions and the consideration of alternative fuels and technologies
- Work with our current supply chain partners on these subjects, encouraging them to innovate and propose new products and services that acknowledge the requirements to adapt to and mitigate climate change impacts
- When selecting new supply chain partners, we will actively assess their approach, credentials and experience so as to proactively reduce the impact they have on climate change in the goods, works and services they provide to us
- Work with others, including our port users and tenants, to help enable low carbon transitions
- Recognise our role in facilitating a similar transition to a lower-carbon future across the maritime and transport sectors as a whole
- Understand and report on our climate change risks and opportunities in order to inform our approach towards adapting to climate change
- Focus on flexible and adaptive infrastructure, systems and operations to promote 'future-proofing' solutions that are able to cope as conditions change
- Consider the use of nature-based solutions and adaptive management

Peel Ports Group will continue to contribute to the local, national and global discussions on climate change to ensure that port interests are promoted, protected and ultimately part of the solution for a sustainable future.

Mark Whitworth
CEO, Peel Ports Group



Date: April 2021 | Issue 01

Appendix 3:

GROUP ENVIRONMENT POLICY

ENVIRONMENTAL POLICY STATEMENT

Peel Ports Group operates as a statutory harbour authority, licencing authority, port operator and a landowner in numerous locations around the UK and Ireland.

Government Policy requires harbour authorities to strike an appropriate balance between long term protection of the environment and securing of sustainable economic growth.

In discharging its duties the Peel Ports Group will be committed to manage its obligations to the environment in a responsible manner and to develop its business to meet the needs of our customers in a manner which has due regard to sustainable development both for its business and the environment.

It is Peel Ports Group Policy to:

- Comply with environmental legislation and other compliance obligations that relate to our business
- Protect the environment from negative impact including pollution and contamination,
- Follow best environmental practice when conducting business and managing the Company's estate
- Maintain a high level of preparedness and respond in an appropriate and timely manner to any incident or emergency that may impact on the environment
- Ensure that our staff and contractors are given appropriate and relevant environmental information and training
- Minimise any significant adverse environmental impacts of new developments and work towards sustainable development
- Reduce waste generation and strive to recycle waste wherever possible to minimise the use of landfill
- Maintain communication with relevant regulators and authorities where there are common environmental interests
- Prepare, publish and monitor environmental objectives and targets with the view of continual improvement
- Pursue the responsible and efficient use of natural resources and energy with the view to ensuring sustainability of resources and reduction in carbon emissions
- Enforce the responsible management of environmental impacts among our tenants when they have the potential to affect our environmental obligations
- Communicate and engage with employees, stakeholders and port users on environmental matters

This policy applies to all Peel Ports' employees and contractors. It is the responsibility of all employees to adhere to any environmental procedures, guidance or instructions detailed by the business. **This policy will be reviewed in 12 months time.**

Mark Whitworth
CEO, Peel Ports Group



Date: September 2020 | Issue 04

Appendix 4:

GROUP HEALTH, SAFETY AND WELFARE POLICY

GROUP HEALTH, SAFETY AND WELFARE POLICY

Peel Ports Group (“the Group”) considers that the interests of the Group and its employees are best served by a positive and committed approach to Health, Safety and Welfare management. This approach will help to prevent work related injuries and ill health whilst also helping to ensure the continuing prosperity of the Group and its employees.

The Group recognises and accepts its responsibilities under the Health and Safety at Work Act 1974 and is fully committed to delivering on these responsibilities.

It is the responsibility of Management at all levels to prioritise Health, Safety and Welfare matters during the decision making process and to promote good practice in the planning and execution of all work related activities.

In support of the most appropriate outcomes, Management will also consult with employees on Health, Safety and Welfare matters, and in particular in the development and review of safe systems of work.

Employees will, in the course of their employment, receive information, instruction and training regarding workplace hazards along with the mitigations available to control and eliminate them. Employees must execute tasks in compliance with statutory provisions and the Group’s policies and procedures in such a way as to minimise the risk of injury and ill health.

Employees, contractors, other workers and visitors to the Group’s sites will be expected to comply with the Group’s requirements in relation to Health, Safety and Welfare matters.

The Group is committed to continuous improvement in Health, Safety and Welfare management and will deliver this goal by setting plans, objectives and targets. The delivery of our plans will be monitored and our systems will be continuously audited to verify compliance and adherence to Group policies.

This Policy Statement applies to every employee and contractor of the Group. You should make yourself fully aware of its content, adhere to it at all times and support its implementation.

The Group is committed to creating robust Health, Safety and Welfare management systems offering protection to all parties who may be directly or indirectly affected by our operations. To assist us in fulfilling these objectives the Group requires that all parties identify workplace hazards ensuring that they are appropriately mitigated. Where workplace hazards have the potential to affect the health of our employees, we will conduct such health surveillance and screening as may be necessary to verify that our controls are effective.

For and on behalf of the Governance Committee,

Mark Whitworth
CEO, Peel Ports Group



Date: October 2020 | Issue 6.3

Appendix 5:

GLOSSARY OF TERMS

All incidents should be recorded once, in the highest appropriate category.

Lost Time Incident (LTI): An incident that prevents normal and amended duties from being performed for the whole of a future rostered shift.

Restricted Workday Incident (RWI): An incident that prevents normal duties from being performed on the next rostered shift however the employee is fit for (and given) amended duties.

Medical Treatment Incident (MTI): An incident requiring treatment beyond the competency of a first aider (e.g. from a doctor, nurse or dentist). Note that a precautionary visit to hospital (including x-ray or scan) does NOT trigger an MTI classification unless additional medical treatment (e.g. stitches) is required.

First Aid Incident (FAI): An incident requiring treatment by a first aider only.

Minor Injury: A minor injury that does not require first aid or other treatment e.g. minor cut, bruise or graze.

Separately from the five injury classifications above, there are parallel definitions and statutory reporting obligations arising from the RIDDOR Regulations 2013:

RIDDOR Reportable Injury:

1. An injury that results in an employee being away from work, or unable to perform their normal work duties, for more than seven consecutive days. This period does not include the day of the incident but does include weekends and rest days. A report of the incident must be submitted to the Health and Safety Executive (HSE) within 15 days.

2. One of the “Specified Injuries” described in the regulations that must also be reported to the HSE regardless of any absence period.

RIDDOR Dangerous Occurrence: An incident falling within one of the 27 ‘Dangerous Occurrences’ described in the regulations. Reports of such incidents must be made immediately by the quickest practicable means and followed up by a written notification within 10 days.

RIDDOR Reportable Diseases: One of the specified “Reportable Diseases” described in the regulations linked to occupational exposure to specified hazards. Reports must be made by the quickest practicable means and followed up by a written notification within 10 days.

BPA	British Ports Association
COSHH	Control of Substances Hazardous to Health
CO	Carbon Monoxide
DfT	Department for Transport
EA	Environment Agency
EHS	Environment, Health and Safety
EMS	Environmental Management System
ESOS	Energy Savings Opportunity Scheme
FY	Financial Year
HFCs	Hydrofluorocarbons
GIS	Geographical Information Systems
INNS	Invasive Non Native Species
MEIN	Marine Environment Information Note
MMO	Marine Management Organisation
MSMS	Marine Safety Management System
NMVOCs	Non-Methane Volatile Organic Compounds
NO	Nitrogen Oxides
PAQS	Port Air Quality Strategy
PCBs	Polychlorinated Biphenyls
SHA	Statutory Harbour Authority
UKMPG	UK Major Ports Group

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