Green Isle Foods
IDA Industrial Estate
Monread Road
Naas
Co Kildare

IPPC Licence Reg No. P0805-01

Annual Environmental Report
2008
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| 1.11   | Site Environmental Policy            |          |
| 1.31   | Environmental Management Structure Chart |        |
| 2.11   | Section 4.2 Releases to Waters X Electronic AER P0805 2008 |        |
| 2.21   | Section 4.3 Releases to Sewer X Electronic AER P0805 2008 |        |
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Section 1.1 Introduction

The following is the Annual Environmental Report in accordance with Schedule D of the IPPC Licence Reg. P0805-01, concerning the activities of Green Isle Foods Ltd, IDA Industrial Estate, Monread Road, Naas, Co Kildare.

The current IPPC Licence was granted by the Agency on the 28th September 2007 and this AER report has taken information from Jan 2008 to Dec 2008.

Under the standard S.I. No.279 of 2006 the class of activities for the site are the following:

7.8 Treatments of processes for the purpose of the production of food products from

   a) Animal raw materials (other than milk) with a finished product production capacity greater than 75 tonnes per day
   b) Vegetable raw material with a finished product production capacity greater than 300 tonnes per day (Average value on a quarterly basis)

Green Isle Environmental Policy Statement

See Attachment 1.11- Green Isle Foods Environmental Policy 2004.
Section 1.20 Site Description

Green Isle Foods Ltd is part of the Northern Foods Group PLC., and is situated in Naas, Co. Kildare on a 20 acre site with a production floor space of 24,000 sq/metres.

The plant is a manufacturer and supplier of frozen pizza products primarily to the Irish and UK markets.

The manufacturing process itself is highly automated and involves the blending, mixing, forming, baking, freezing and packaging of food ingredients into saleable end product. The main ingredients used are water, flour, edible oils and yeast for the baking process and a combination of sauces, cheese, vegetables and meats for the pizza topping process. The process generates over one hundred ton of finished product daily.

The manufacturing facility operates mainly on shift pattern covering an average of 5-6 days per week. This is contingent upon customer demand. There are approximately 430 employees at the facility.

1.21 Process Description

The following Main processes are carried out at the Green Isle Foods facility:

- Goods Intake Area
- Bakery Process
- Sauce Room Process
- Pizza Topping Process
- Refrigeration process
- Packaging Process
- Goods Outwards
- Services
- Effluent Treatment Plant
- Microbiology Laboratory / Offices / Amenities / Administration.
1.3 Company Organisation & Site Management

Company Organisation

Green Isle Foods has a structured Management approach to the operation of the business in terms of Environment, Product Quality, Process Control, Safety, Training and Analytical Capability.

The installation has maintained BRC accreditation since 2003 and is licensed with the Department of Agriculture as a food plant.

Training of personnel is a key function in the successful operation of the installation and is certified to the FAS Excellence through People Standard.

Central to this structured approach is the Quality and Environmental Management Systems, which provide the structured framework for operational and quality control at the plant and provide for the maintenance and improvement in the plants environmental performance.

The Quality Management System is audited on an ongoing basis by a combination of internal audits and external certification surveillance audits.

**Green Isle Foods Management Structure Organisational Chart**

See Attachment 1.31 – Green Isle Foods Management Structure Chart
Section 2  Summary Information

The following section relates to a summary of environmental information related to the items listed, in accordance with the Guidance Note for Annual Environmental Report. The information contained is for the year January 2008 to December 2008.

2.1  Emissions to Water
2.2  Emissions to Sewer
2.3  Emissions to Air
2.4  Waste Management
2.5  Natural Gas Consumption
2.6  Electricity Consumption
2.7  Energy Consumption Summary
2.8  Water Consumption
2.9  Environmental Complaints
2.10 Environmental Incidents
Section 2.1  Emissions to Water

The following section summarises all data collected relating to emissions to water.

<table>
<thead>
<tr>
<th>Emission Point Reference No.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SW –1</td>
<td>Surface Water Discharge to a tributary of the Morell River</td>
</tr>
</tbody>
</table>

Emission Point Reference No.: SW 1

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Emission Limit Value</th>
<th>Monitoring Frequency</th>
<th>Av. Emission (mg/l)</th>
<th>Max Emission (mg/l)</th>
<th>Min. Emission (mg/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td>pH</td>
<td>*</td>
<td>Monthly</td>
<td>7.2</td>
<td>9.9</td>
<td>6.2</td>
</tr>
<tr>
<td>COD</td>
<td>*</td>
<td>Monthly</td>
<td>34.5</td>
<td>158</td>
<td>7</td>
</tr>
<tr>
<td>Total Nitrogen</td>
<td>*</td>
<td>Monthly</td>
<td>3.7</td>
<td>1</td>
<td>7.36</td>
</tr>
<tr>
<td>Conductivity</td>
<td>*</td>
<td>Monthly</td>
<td>342</td>
<td>1,022</td>
<td>59</td>
</tr>
<tr>
<td>Total Ammonia</td>
<td>*</td>
<td>Monthly</td>
<td>0.16</td>
<td>0.62</td>
<td>0.06</td>
</tr>
<tr>
<td>Visual Inspection</td>
<td>*</td>
<td>Daily</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* No Emission Limit Value specified in licence

The site’s IPPC licence requires that monitoring of surface water be carried out monthly for pH, COD, Total Nitrogen, Total Ammonia and Conductivity and Daily visual inspections as per schedule C.2.3.

This monitoring is being carried out, with a daily inspection log in place.

See Attachment 2.11 – Section 4.2 Green Isle Foods Electronic AER P0805-01 2008 for 2008 information.
Section 2.2  Emissions to Sewer

The following section summarises all data collected relating to emissions to sewer.

<table>
<thead>
<tr>
<th>Emission Point Reference No.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SE –1</td>
<td>Treated Effluent Final Discharge to sewer</td>
</tr>
</tbody>
</table>

Emission to Sewer - Emission Point Reference No. SE-1

All process wastewater is collected in the designated process water drainage system and conveyed to the effluent plant crude sump prior to pumping to the effluent treatment plant balancing tank. Effluent treatment on site is primary treatment.

Process effluents arise from the following areas:
- Bakeries.
- CIP system (Clean In Place)
- Boilers
- General washing within the processing areas
## Emission Point Reference No.: SE 1

<table>
<thead>
<tr>
<th>Parameter</th>
<th>IPPC ELV’s</th>
<th>Monitoring Frequency</th>
<th>Av. Emission (mg/l)</th>
<th>Max Emission (mg/l)</th>
<th>Min. Emission (mg/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flow</td>
<td>420 M3 / day</td>
<td>Continuous</td>
<td>291</td>
<td>420</td>
<td>150</td>
</tr>
<tr>
<td>Temperature</td>
<td>&lt;43ºC</td>
<td>Continuous</td>
<td>17.4</td>
<td>21.5</td>
<td>10.8</td>
</tr>
<tr>
<td>pH</td>
<td>5.5 – 9.5</td>
<td>Monthly</td>
<td>6.6</td>
<td>8.9</td>
<td>4.7</td>
</tr>
<tr>
<td>BOD</td>
<td>750</td>
<td>Monthly</td>
<td>336</td>
<td>550</td>
<td>200</td>
</tr>
<tr>
<td>COD</td>
<td>2,000</td>
<td>Monthly</td>
<td>667</td>
<td>1,146</td>
<td>351</td>
</tr>
<tr>
<td>Suspended Solids</td>
<td>500</td>
<td>Monthly</td>
<td>84.3</td>
<td>145</td>
<td>27</td>
</tr>
<tr>
<td>Total Nitrogen (as N)</td>
<td>80</td>
<td>Monthly</td>
<td>11.51</td>
<td>19.72</td>
<td>5.12</td>
</tr>
<tr>
<td>Orthophosphate (as P)</td>
<td>5</td>
<td>Monthly</td>
<td>0.02</td>
<td>0.078</td>
<td>0.004</td>
</tr>
<tr>
<td>Total Phosphorus (as P)</td>
<td>10</td>
<td>Monthly</td>
<td>0.28</td>
<td>0.693</td>
<td>0.066</td>
</tr>
<tr>
<td>Oils, Fats &amp; Grease</td>
<td>100</td>
<td>Monthly</td>
<td>19</td>
<td>37</td>
<td>1</td>
</tr>
</tbody>
</table>

As per table above, the emission limit values (ELV’s) are set as per Schedule B.3 of the site’s IPPC licence.

All analysis is carried out externally in an accredited laboratory.

There were 2 reported licence exceedances during 2008 as follows:

1. **pH** – This was exceeded on one occasion on the 2/10/2008, and corrective & preventative actions have being put in place.

2. **Daily Volume** – High discharge volumes recorded between 18/04/08 – 21/4/08 were as a result of an error in the recording equipment. This flow measuring equipment is now being calibrated annually by a certified external contractor.

See Attachment 2.31 – Section 4.3 Green Isle Foods Electronic AER P0805-01 2008 for 2008 information.
Section 2.3  Emission to Air

The following section summarises all data collected relating to emissions to Air.

**Main Emission Points** – There are no main emission points as all are deemed as minor as boiler thermal input is below the 20 MW cut-off point.

**Minor Emission Points - Boiler Emissions** - There are currently two boilers on site. The boilers are used to generate steam to a pressure of 10bar. This steam is used in the manufacturing process and supply of hot water for washing and cleaning purposes.  
*It should be noted that only one boiler (Beel Cochran – gas only) is operated and the second boiler (HDS Boiler – duel fuel) is a cold stand-by.*

<table>
<thead>
<tr>
<th>Reference No.</th>
<th>Location</th>
<th>Emission Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1 - 1</td>
<td>Roof Area Over main steam boiler house</td>
<td>Stack - HDS Boiler</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A1 - 2</td>
<td>Roof Area Over main steam boiler house</td>
<td>Stack - Beel Cochran Boiler</td>
</tr>
</tbody>
</table>

Two boiler efficiency tests were carried out in December 2008 by Newtown Technical and Combustion Services Ltd.

Results of this analysis are shown below.

**Table 6  Emissions to Atmosphere Summary**

<table>
<thead>
<tr>
<th>Date</th>
<th>Emission Pt</th>
<th>Low/High Fuel</th>
<th>Parameter</th>
<th>Value Recorded</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/12/2008</td>
<td>Boiler 1 HDS Boiler</td>
<td>High Fuel</td>
<td>Efficiency</td>
<td>82.2%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NOx</td>
<td>79 ppm</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>SOx</td>
<td>0 ppm</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>CO</td>
<td>2 ppm</td>
</tr>
<tr>
<td>9/12/2008</td>
<td>Boiler 2 Beel Cochran</td>
<td>High Fuel</td>
<td>Efficiency</td>
<td>81.9%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NOx</td>
<td>104 ppm</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>SOx</td>
<td>0 ppm</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>CO</td>
<td>1 ppm</td>
</tr>
</tbody>
</table>

No guidance values or ELV’s are given in the IPPC licence with regards to atmospheric emissions. However, an efficiency of more than 80% is usually taken to be acceptable so the boiler’s efficiencies are above acceptable limits. NOx and SOx levels are both low.

See Attachment 2.32 – Section 4.1 Green Isle Foods Electronic AER P0805-01 2008.
Section 2.4 Waste Management

This section summarises all data relating to waste emissions and recycling of waste products for Green Isle Foods. Waste Management forms part of the site’s Environmental Management Programme.

The following waste streams are generated from the site.

<table>
<thead>
<tr>
<th>Waste Material</th>
<th>Method of Disposal</th>
<th>Transport Company Responsible</th>
<th>Handling Facility Permit No.</th>
<th>2008 Total Tonnage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effluent Sludge</td>
<td>Land Injection</td>
<td>Clearpower Ltd</td>
<td>WCP/KE/428C/17b</td>
<td>2,329</td>
</tr>
<tr>
<td>Food Waste CAT 3</td>
<td>Licensed Rendering</td>
<td>O’Toole Composting WCP/KE/310C/05B</td>
<td>Waterford Proteins IPPC 586 DOA No. R919</td>
<td>857</td>
</tr>
<tr>
<td>Food Waste CAT 3</td>
<td>Licensed Rendering</td>
<td>O’Toole Composting WCP/KE/310C/05B</td>
<td>Munster Proteins DOA no. R914</td>
<td>44</td>
</tr>
<tr>
<td>Food Waste CAT 3</td>
<td>Licensed Rendering</td>
<td>O’Toole Composting WCP/KE/310C/05B</td>
<td>Food Surplus Management, DOA No. ID9</td>
<td>15</td>
</tr>
<tr>
<td>Food Waste - Bakery</td>
<td>Animal Feedstuff</td>
<td>Millstream Power Ltd WCP/KE/218cC/07C</td>
<td>WP 0605</td>
<td>3645</td>
</tr>
<tr>
<td>Food Waste - Bakery</td>
<td>Animal Feedstuff</td>
<td>AES Ltd WCP/KE/51C/05C</td>
<td>Michael Wall DOA No. I1140544</td>
<td>155</td>
</tr>
<tr>
<td>Landfill waste</td>
<td>Landfill</td>
<td>AES Ltd WCP/KE/51C/05C</td>
<td>KTK Landfill W008-01</td>
<td>399</td>
</tr>
<tr>
<td>Landfill waste – packaged pizza waste</td>
<td>Landfill</td>
<td>O’Toole Composting WCP/KE/310C/05B</td>
<td>Carlow Landfill, Co Carlow W0025-01</td>
<td>40</td>
</tr>
<tr>
<td>Cardboard / Paper</td>
<td>Recycling</td>
<td>AES Ltd WCP/KE/51C/05C</td>
<td>WCP/KE/51C/05C</td>
<td>295</td>
</tr>
<tr>
<td>Plastic</td>
<td>Recycling</td>
<td>AES Ltd WCP/KE/51C/05C</td>
<td>WCP/KE/51C/05C</td>
<td>85</td>
</tr>
<tr>
<td>Wood (Pallets)</td>
<td>Re- Use</td>
<td>Plunkett Pallets Ltd</td>
<td>Not applicable – pallets being re-used.</td>
<td>173</td>
</tr>
<tr>
<td>Steel / Tin</td>
<td>Recycling</td>
<td>Hegarty Metal Recycling</td>
<td>WP – 05-04</td>
<td>83</td>
</tr>
<tr>
<td>Oily Water from oil interceptors</td>
<td>Hazardous Disposal</td>
<td>Enva Ireland Ltd.</td>
<td>WP 184 - 1</td>
<td>3</td>
</tr>
<tr>
<td>Fluorescent Bulbs</td>
<td>Hazardous Disposal</td>
<td>Irish Lamp Recycling Ltd WCP/KE/61C/05C</td>
<td>WP 104-1</td>
<td>0.9</td>
</tr>
</tbody>
</table>

Full details of the above waste streams are provided for reference, in a copy of the Electronic AER sent in to the EPA. This contains all information as recommended on page 10 of EPA Guidance Note for Annual Environment Report.

See Attachment 2.41 – Section 5 Green Isle Foods Electronic AER P0805-01
Section 2.4 Waste Management - Sludge

Introduction - Sludge Holding Facility

All Green Isle Foods process effluent and associated wastewater is piped to the on site’s primary treatment plant. This effluent comprises only of those arising from general processing operations, all domestic sewage is discharged direct to County Council sewer.

The associated food-based sludge is collected in a Sludge Holding Tank with a solids content of 4%. This sludge is then transported off-site for storage and consequent land injection as a nutrient substitute.

A request has been submitted to the agency 27/1/09 to have this facility licenced under the Green Isle Foods IPPC licence.

The 2008 NMP for the site was submitted in April 2008.

In 2008, the sludge was land-injected on two farms as per the table below.

This section summarises all data relating to Land Injection of Sludge for Green Isle Foods. The information contained is for the year January 2008 to December 2008.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Sludge Produced</th>
<th>Farmer</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>1,277 Tonnes</td>
<td>Gowran Grange, Co Kildare</td>
</tr>
<tr>
<td>2008</td>
<td>1,052 Tonnes</td>
<td>Derrylea, Monsteravin, Co Offaly</td>
</tr>
</tbody>
</table>

See Attachment 2.41 – Section 5 Green Isle Foods Electronic AER P0805-01
**Organic Waste Analysis (effluent plant sludge)**

According to Schedule C.4, organic waste must be analysed annually by standard methods to determine the % Dry Matter, Total N, Total P, Total K, pH, Fats, oils & Greases and analysed monthly to determine the volume/mass in storage.

A two-monthly report is received from the contractor which details volumes of sludge removed from site and also details available storage. This report is submitted to the agency on a bi-monthly basis.

Results for waste analysis are quoted in the Nutrient Management Plan for 2008. A summary of the results quoted in the NMP is shown in the Table below.

Table 9  Summary of % Dry Matter and Total N/P/K Data.

<table>
<thead>
<tr>
<th>Dry Matter</th>
<th>Total N</th>
<th>Total P</th>
<th>Total K</th>
<th>pH</th>
<th>Oils, Fats &amp; Greases</th>
</tr>
</thead>
<tbody>
<tr>
<td>WWTP Sludge</td>
<td>4</td>
<td>350</td>
<td>18.6</td>
<td>Not available</td>
<td>5.7</td>
</tr>
</tbody>
</table>

On revision of the 2008 sludge analysis, it was noted that Total K was not analyzed.

All relevant parameters as per schedule C.4 of the sites IPPC licence will be analyzed during 2009.
Section 2.5 Natural Gas Energy Consumption 2008

Gas usage forms part of our Environmental Management Programme.

The table below details the annual Gas usage for Green Isle Foods for 2008.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Product Produced</th>
<th>Total Gas Usage</th>
<th>Gas Usage per Tonne Produced</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>36,113 Tonnes</td>
<td>27,019,786 KWh</td>
<td>748 KWh / Tonne Produced</td>
</tr>
</tbody>
</table>

Section 2.6 Electricity Energy Consumption 2008

Electricity usage forms part of our Environmental Management Programme.

The table below details the annual Electrical usage for Green Isle Foods for 2008.

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Product Produced</th>
<th>Total Electricity Usage</th>
<th>Electricity Usage per Tonne Produced</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>36,113 Tonnes</td>
<td>22,178,965 KWh</td>
<td>614 KWh / Tonne Produced</td>
</tr>
</tbody>
</table>
Section 2.7 Energy Efficiency Report Summary 2008

As a result of the energy audit carried out in June 2008, the following initiatives are being assessed and implemented at the site:

1. Lighting: All light fittings in the service roof void area have now been replaced with PLOR-CS 51 watt fittings, which in turn have reduced electricity usage from 244,000 to 35,600 KW per annum.
2. An extensive electricity, gas and water metering system has been put in place during 2008.
3. An ultrasonic air leak meter is now being used to detect all air leaks on site, with plan in place to reduce all leaks by 100% by end of 2009.
4. CHP system currently being installed and commissioning expected to be mid-May 2009, and this is expected to reduce electricity consumption by 30%.
5. A project involving Heat recovery from the refrigeration plant is being assessed.
6. 2 out of 5 freezer fan invertors installed which will reduce electricity consumption. Remaining invertors to be installed by May 2009.
7. A project involving evaporator temperature reduction is currently in place, with -37 C achieved, reduced from -39 C freezer temperatures.
8. The shut-down and start-up procedures have being put in place which will reduce gas consumption in throughout the Bakery Department.
9. Boiler head pressure being assessed with a view to reduce.
10. Staff awareness campaign on energy usage was introduced in 2008.
Section 2.8 Water Consumption 2008

This section summarises all data relating to Water usage for Green Isle Foods.

All Green Isle Foods water is provided by the mains supply.

<table>
<thead>
<tr>
<th>Total Water Usage For 2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>On Site Water Extraction</td>
</tr>
<tr>
<td>Municipal Water Supply</td>
</tr>
</tbody>
</table>

Section 2.9 Environmental Complaints

This section summarises all data relating to Environmental Complaints received during the period January 2008 to December 2008.

There were No Environmental Complaints received during 2007.

<table>
<thead>
<tr>
<th>Complaint</th>
<th>Odour</th>
<th>Noise</th>
<th>Water</th>
<th>Procedural</th>
<th>Dust</th>
<th>Miscellaneous</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Section 2.10 Environmental Incidences

This section summarises all data relating to Environmental Incidents received during the period January 2008 to December 2008.

There were No Environmental Incidences during 2007.

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Total No. Incidences</th>
<th>Type of Incident</th>
<th>Date of Incident</th>
<th>Authorities Informed</th>
<th>Incident Follow Up</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
</tbody>
</table>
Section 3.0 Management of the Activity

This section summarises all data relating to Environmental Management of the Facility for the period January 2008 to December 2008.

Section 3.1 Environmental Objectives and Targets

The purpose of this procedure is to define the process of setting out environmental objectives and quantify applicable targets in the production of frozen ready meals, [including the minimisation, (and where possible) elimination of wastes from the production processes]. The procedure also defines the process for establishing and maintaining an Environmental Management Programme (EMP) that will successfully meet the stated environmental objectives and targets.

See Attachment 3.21 – Environmental Objectives and Targets
Section 3.2 Environmental Management Programme

The procedure referred to in section 3.1 defines the process for establishing and maintaining an Environmental Management Programme (EMP) that will successfully meet the stated environmental objectives and targets.

See the EMP for 2008 Attachment 3.21

See Attachment 3.21 –Environmental Management Programme

Section 3.3 Public Access to Environmental Information

See Attachment 3.31 –Public Access to Environmental Information

The purpose of this procedure is to outline the procedure involved in showing a member of the public information on the Sites Environmental performance.

Section 4.0 Pollutant Release and Transfer Register 2008

This section summarises all data relating to the Pollutant Release and Transfer Register during the period January 2008 to December 2008.

As a result of change in the reporting of PRTR and the new electronic system copies are attached for reference to the applicable sections.

See Attachment 2.11 – Section 4.2 Green Isle Foods Electronic AER P0805-01 2008
See Attachment 2.32 – Section 4.1 Green Isle Foods Electronic AER P0805-01 2008
See Attachment 2.21 – Section 4.3 Green Isle Foods Electronic AER P0805-01 2008
See Attachment 2.41 – Section 5 Green Isle Foods Electronic AER P0805-01 2008

Section 5.0 CRAMP report 2008

As per conditions 10.2, 10.3 and 10.4 of the site’s IPPC licence, a CRAMP report was prepared for the site in 2008.

This report has been reviewed and updated.
Section 6.0 Noise Report 2008

According to Condition 6.12 of the licence, environmental noise must be monitored annually. A noise survey was conducted on 25\textsuperscript{th} April 2008 by Euro Environmental Services Ltd and the results submitted to the EPA (Report No. 3750/M01). This survey concluded that:

- The vast majority of noise audible at this location was due to continual traffic during the day and night-time periods.
- 2009 report is to provide more detail on site specific and traffic related noise.
- Site is also to assess site specific location noise as per the 2009 EMP, in particular the refrigeration compressor units.

Section 7.0 ELRA Report 2008

According to Condition 12.3 of the licence, an Environmental Liabilities Risk Assessment (ELRA) report was prepared for the site on 22-10-08, report no. EL1209 by Panther Environmental Solutions Ltd and this report was submitted to the EPA.

The combined resources of Northern Foods Group are such as to underwrite the liabilities and financial commitments associated with the remediying of the risks identified in this report.

This report is attached as per Appendix No. 4.11

This ELRA report will be updated in October 2009.
2.0 ENVIRONMENTAL POLICY STATEMENT

Protection of the environment is a priority task to the Green Isle Food Group. To this end the company operate a formally documented Environmental Management System (EMS) to manage the environmental impacts associated with the manufacture of it's food products.

The company is committed to complying in full with all relevant EU and national environmental legislation and with Regulatory Authority guidance. The Green Isle Foods Group is committed to the continued improvement of the environmental performance of the company.

In general the company is committed to the continuing identification and control of the significant environmental impacts associated with the manufacturer of its food products. These include:-

- Effluent discharge
- Odour
- Noise
- Solid Waste Management
- Sustainable use of natural resources (e.g. energy and water) compatible with the economic sustainability of the organisation.

The Green Isle Food Group will seek, as far as reasonably practicable, to protect the global environment and local environment and have due regard to the communities living in the environs of the company site.

The above commitments form the basis for a set of Environmental Objectives and Targets within the EMS.

The General Manager, Management team and operators actively support the environmental policy and have been integral in its initiation, development and implementation.

Company relevance of this Environmental Policy will be reviewed at the Annual Environmental Management Review.

Signed: .................................................. ..................................................
Position: General Manager                             Green Isle Foods Group
Date: .................................................. ..................................................
Environmental Management Organisation Chart

Brendan O’Reilly
General Manager

Adrian Masterson
Environmental Manager

Sarah Hunt
Health & Safety Manager

Seamus Hartnett
Services Manager

Seamus O’Shea
Senior Quality / Technical Manager

Liam Murray
Engineering Maintenance Manager

Pat Dunne
Energy / Projects Manager

Kevin Sheehan
Manufacturing Business Unit Manager

Brendan Scully / Seamus Brady
Effluent Plant Engineers

Department Quality Managers

Bakery / Topping / Packing Engineering Managers

Department Production Managers
1.1 **Effluent Treatment Plant**

**Priority No: 1**

1.2 **Objective:**

- To comply with all effluent discharge parameters as per the site’s IPPC licence limits.

1.3 **Strategy:**

- Carry out water usage audit in factory and determine main users.  
  **Action: AM by April 30th 2009.**

- Install 2 tray washer water meters to determine the main bakery total usage.  
  **Action: Eng by August 30th 2009.**

- Assess night cleaning water usage, using HE water meter.  
  **Action: Eng by April 30th 2009.**

- Assess mixing/aeration of effluent plant balancing tank.  
  **Action: AM by May 30th 2009.**

- Install effluent plant discharge volume and temperature meter to determine daily factory total usage.  
  **Action: Eng by Feb 28th 2009.**

1.4 **Monitoring:**

- Monitoring of final effluent and water usage on a daily basis.

1.5 **Target:**

- To comply with all relevant parameters as per the IPPC licence, by end of EMP year 1, December 2009.
- To reduce water usage by 10% by December 2009.
2.1 Food Waste – CAT 3

Priority No: 2

2.2 Objective:
- Objective is to minimise disposal of CAT 3 Food waste to rendering.

2.3 Strategy:
- **Carry out waste audit of CAT 3 waste on site to determine what can be reduced.**

2.4 Monitoring:
- Record details of all Food waste, including landfill and sludge leaving the site.

2.5 Target:
- To reduce CAT 3 Food wastes to rendering by 2% based on 2008 tonnages.
3.1 Chemical Usage and Bunding

Priority No: 3

3.2 Objective:
- To have a procedure to deal with spills if they occur.
- To provide bunding for all liquid chemicals stored on site.

3.3 Strategy:
- Carry out corrective actions as per June 2008 Pipe and Bund inspection report.
  Action: Eng by Dec 31st 2009

- Assess the chemical room spillage containment capacity.

- Review and train spillage containment and ammonia leak procedures.

- Obtain MSDS sheets for all chemicals on site.

3.4 Monitoring:
- Recording the number of chemical spillages per annum.

3.5 Target:
- To maintain zero spillages during 2009.
4.1 **Resource Consumption**

Priority No: 4

4.2 **Objective:**

- To assess energy usage per unit production based on Jan 2008 – December 2008 levels.

4.3 **Strategy:**

- **Continue monthly energy consumption reduction group meetings.**
  Action: Eng on-going.

- **Continue assessing and implementing the sites 2009 energy reduction plan.**
  Action: Eng by Dec 31st 2009

4.4 **Monitoring:**

- Monitoring of electricity and gas usage on a weekly basis.
  Action: Engineering.

4.5 **Targets:**

- To examine and evaluate all available data and set achievable target for December 2009.
5.1 **Noise**

**Priority No: 5**

5.2 **Objective:**
- To maintain noise level below 55 dB (A) outside boundary during daytime hours.
- To maintain noise level below 45 dB (A) outside boundary during night-time hours.

5.3 **Strategy:**

- Address plant Services Area for Noise Reduction i.e. Air Compressor Units and subsequent housing.  
  Action: AM by May 30th 2009

- Conduct noise surveys at boundaries annually.  
  **Action: AM annually.**

5.4 **Targets:**

As objectives above.
Purpose:
To outline the procedure involved in showing a member of the public information on the Sites Environmental performance.

Responsibility:
The Environmental Officer is responsible for the implementation of this procedure.

Documentation:
Public Information Folder.

Procedure:
1. The company shall have a folder at reception that contains information on the environmental performance of the company.
2. The Environmental Officer is responsible for the maintenance and updating of the Public folder.
3. In the absence of the Environmental Officer it shall be the responsibility of the H&S Officer to assist members of the public seeking environmental information.
4. Members of the public, upon appointment of up to 24 hours notice, can view the folder Monday - Friday 09.00am – 16.00 pm.
5. Members of the public requesting environmental information outside the time specified shall be requested to return during the specified hours. If this is not possible then they will be requested to submit a written request detailing the information required.
6. A member of staff shall remain with the member(s) of the public at all times during the viewing of the Public Access folder.
7. The folder at reception shall contain the following information, or an index to the following information:
   - Company activity
   - List of relevant Contacts
   - A copy of the IPPC Licence
   - Copy of Environmental Policy.
   - Copy of Environmental Objectives and Targets.
   - Environmental graphs of landfill waste, recycled materials, energy usage and effluent discharge.
8. A member of staff, upon return, shall check the Public Access folder after viewing by a member of the public.