MAJOR ACCIDENT PREVENTION POLICY

ATLANTIC FUEL SUPPLY COMPANY LIMITED – FOYNES OIL TERMINAL

The Major Accident Prevention Policy (MAPP) for Atlantic Fuel Supply Company Ltd. (AFSC) has been established in line with the requirements of the Chemicals Act control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (S.I. No. 209 of 2015).

AFSC is involved in the receipt of product from shipping and pipeline, storage and dispensing to road vehicles, pipeline or ship. The following products are handled:

- Gasoline (ULP)
- Dual Purpose Kerosene (DPK)
- Derv (DERV)
- Gas Oil (GO)
- Heavy Fuel Oil (HFO)
- Denatured Ethanol (ETDN)
- Fatty Acid Methyl Ester (FAME) for blending.

The facility also stores small quantities of petroleum based marker dyes, blends and product additives.

AFSC is the operator of the facility and it has engaged Inter Terminals Shannon Ltd (ITSL) to manage the terminal on a day-to-day basis.

This facility is an ‘Upper Tier’ site as defined in S.I. No. 209 of 2015, and the Company recognises that the nature of its activities gives rise to major accident hazards. In recognition of its responsibilities to its employees, the public and the environment, this MAPP is designed to guarantee a high level of protection of human health and the environment.

AFSC Ltd’s mission statement in Health, Safety and the Environment is zero harm to people or the environment and zero accidents or losses.

1. Overall Aims and Principles

AFSC and the terminal management company, ITSL, are committed to ensure a high level of protection of human health and the environment, and will:

- Through its Safety Management System (SMS), which shall be proportionate to the hazards, activities and complexity of its operations and of which the MAPP is a part, identify potential major accidents involving dangerous substances at the facility and assess their likelihood and potential consequences.
- Identify and implement the means for preventing major accidents
- Operate systems and procedures that enable it to minimise the consequence to its own employees, contractors, visitors and neighbours, the general public and to the environment of any such accidents, should they occur.
- Make available the necessary resources to ensure that the risks in respect of major accidents are as low as reasonably practicable.

The principles by which AFSC will achieve these aims are:

- Provision of suitable equipment and facilities (designed to accepted European standards or equivalent) for receipt of product from shipping, storage and dispensing to road going distribution vehicles / ships of petroleum products.
- Provision of suitable documented instruction and training for staff operating and using the facility.
• Provision of a Safety Management System integrated with the operation of the facility.
• Setting a zero target for accidents that could cause harm to people and the environment and by reporting and evaluating accidents and near misses.
• Ensuring compliance with the general duties of operators in Regulation 7 of S.I. No. 209 of 2015 and all other relevant legislation.
• Being pro-active in promoting best practices.
• Managing health, safety and environmental protection as a critical business activity by including it in staff objectives and appraisal.

2. Roles and Responsibilities

The management of AFSC and ITSL have overall responsibility for the effective performance of the SMS and for maintaining a culture of continuous improvement of personnel involved in the management of major hazards.

The SMS describes the roles and responsibilities of personnel involved in the management of major hazards at all levels in the organisation including, where appropriate, contactors.

The SMS provides for systematic identification of the training needs for such personnel by the regular review of competence requirements.

3. Identification of Major Accident Hazards

The SMS provides for:

• The identification and assessment of major accident hazards and the assessment of their likelihood and severity. This is done by the use of independent consultants who are charged with the preparation of risk and consequence analysis, and by undertaking hazard operability analysis on its plant.
• The adoption and implementation of procedures for systematically identifying major hazards arising from normal and abnormal operations including subcontracted activities.
• The examination and assessment of existing plant, equipment and procedures through hazard studies and business management reviews. As a consequence of these programmes of actions to address any deficiencies are created.
• The examination and assessment of all new or modified plant and equipment, materials, processes and procedures before their introduction to the facility. This is primarily done by the operation of a management of change system.

4. Safe Operation

The SMS provides for:

• The making of the necessary arrangements and the prescription of the necessary procedures for the safe start-up, operation and shutdown of the plant. A preventative maintenance system for monitoring and condition of all equipment including safety critical plant, ageing plant, instrumentation and control systems.
• Regular review of the processes and review when new technical information is available on materials or process steps.
• The provision of personnel in appropriate numbers and levels of competence, and the identification of the roles and responsibilities of personnel involved in the management of major hazards at all levels in the organisation.
5. Management of Change

The SMS provides for management of change procedures. These ensure that modifications and new installations are assessed to determine safety, health and environmental implications, and the appropriate means to minimise risk. All changes, which are not “like-for-like”, are subject to our management of change system.

6. Emergency Procedures

The SMS provides for:

- The establishment and maintenance of on-site emergency plans and procedures to control and mitigate the consequences of foreseeable major accidents.
- The use, identification and assessment of major accident hazards as the basis for the emergency plans and procedures.
- The testing and review of emergency plans, resources and procedures will be undertaken regularly, with liaison with external emergency services. The provision of emergency training to operators and subcontracted personnel.

7. Monitoring, Audit and Review

AFSC is committed to continuously improving the control of major accident hazards by continuously monitoring the performance of the SMS against the aims and principles set out in this MAPP. The SMS provides for:

- Procedures for ongoing audit and review of compliance with the objectives set out in the MAPP and the SMS.
- Identification of non-compliances and the necessary, corrective action in the form of revised or new procedures, additional safety equipment, further training, re-organisation etc.
- Procedures for reporting incidents.
- Investigation of all such incidents, according to written procedures, and prescription of corrective action on the basis of lessons learnt.
- Continuous monitoring of the effective performance of this MAPP and the SMS by the management of both AFSC and ITSL. Appropriate Key Performance Indicators (KPIs), covering both process and personal safety are reviewed monthly and corrective action taken as necessary.

8. Assessment

This MAPP and the effectiveness and suitability of the SMS is formally reviewed and assessed annually. The SMS provides for:

- Procedures for the review
- Documentation of the review
- Updating of the MAPP and SMS by senior management, based on the conclusions of the review

9. Statement

AFSC is fully committed to implementing this Major Accident Prevention Policy, as stated above and in the Company Safety Report.

Signed: ___________________________       Date: ________________

Chris O’Callaghan
Managing Director, AFSC Ltd