

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

1. Purpose

- 1.1. Covers all communications (including complaints) that deal with issues relating to the environmental and aspects of the company's performance.
- 1.2. Covers all communications that deal with issues relating to the energy performance and energy management system.
- 1.3. Covers internal and external environmental and energy communications.
- 1.4. Covers incoming and outgoing communications with regulatory authorities.
- 1.5. Covers communications with Saint-Gobain environmental and site risk personnel.

2. Scope

2.1. This procedure outlines how to deal with internal and external communications. In addition to this it details the communication requirements outlined in:

- Condition 2, 5, 6 and condition 11 of Saint-Gobain Construction Products (Ireland) Ltd. IED licence P0519(-current version number).
- Condition 2 and condition 3 of Saint-Gobain Construction Products (Ireland) Ltd. Green House Gas Permit IE GHG002-10335(-current version number)
- BES 6001 Responsible Sourcing of Construction Products

3. Responsibility

- 3.1. Operations Director
- 3.2. Plant/ Site Manager
- 3.3. EHS Partners
- 3.4. Technical Manager
- 3.5. Department Managers
- 3.6. All employees

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

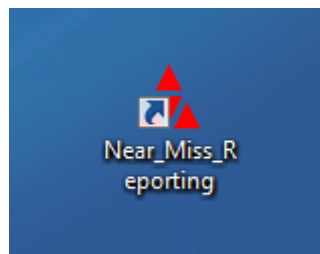
4. General

- 4.1. Communications may be of an internal or external nature and include incidents, observations, complaints, suggestions or queries.
- 4.2. Communications can be either incoming or outgoing.
- 4.3. Report all internal communications using the near miss icon located on desktops or on the Environmental Communications Form Env-Proc-8 which is available on QPulse, Sláinte or through your supervisor. In the case of incoming external communications, the recipient must complete the form.
- 4.4. Environmental and Energy communication of performance and topical issues is conducted through the monthly brief and business update.
- 4.5. EMAT's also incorporate communication including reinforcement of good practices and suggestions for improvement.

5. Procedure

5.1. Reporting observations using the near miss icon available on desk tops

- 5.1.1. Click on the Near Miss icon (shown below)



- 5.1.2. Select the relevant options from the dropdown menus, i.e. site, date etc.
- 5.1.3. Select the type of incident (Descriptions are included)

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

Type of Incident
Level of severity

- TF1 - Lost Time Incident
- TF2 - Medial Treatment
- TF3 - First Aid
- TF4 - Near Miss
- TF5 - Unsafe Act/Condition
- EVE1 - Major accident / incident
- EVE2 - Significant accident / incident
- EVE3 - Moderate accident / incident
- EVE4 - Environmental Near Miss
- EVE5 - Poor environmental Acts / Conditions

5.1.4. Include the aspect

Aspect
For Environmental incidents please select which aspect is impacted most:

- Air
- Biodiversity
- Land
- Noise / Nuisance
- Spill
- Waste
- Water

5.1.5. Give as much detail as possible about the incident including any suggested corrective actions.

5.1.6. Attach a photo of the incident (if possible)

5.1.7. Click Submit.

5.1 Reporting Observations

5.1.1 Complete all sections on side 1 of the report

5.1.2 Record suggestions that may be relevant to prevent a re-occurrence

5.1.3 Inform your supervisor of the observation

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

5.1.4 Return the completed form to the EHS Department or to your supervisor

5.2 Logging Observations – EHS Department

5.2.1 Copy and file the report

5.2.2 Classify the communication using the appropriate EvE indicator. See Appendix 1

5.2.3 Record details on Sláinte as an environmental corrective action request.

5.2.4 Forward the copy to the Department Manager/ Supervisor concerned

5.2.5 Arrange an investigation meeting as required

Uncontrolled when Printed

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

5.3 Initiating preventative/ corrective actions

The Department Manager/ Supervisor responsible for the observation must:

- 5.3.1 Review the observation
- 5.3.2 Set the target date for completion in conjunction with the EHS Department
- 5.3.3 Record details of the preventative or corrective actions in conjunction with the EHS Department
- 5.3.4 Initiate the preventative/ corrective action
- 5.3.5 Return the completed form to the EHS Department
- Respond to originator as required

5.4 Closing out the Observation

The EHS Department must:

- 5.4.1 Review the preventative/ corrective action for effectiveness.
- 5.4.2 Complete the remaining sections on the Sláinte record.
- 5.4.3 File the Communication form and any accompanying documentation including completed work order's.

5.5 Public Communications

- 5.5.1 Communications received from the public must be ratified by the EHS Department
- 5.5.2 Respond to the originator by letter and attach a copy of the letter to the Communication form or Near Miss record.
- 5.5.3 External communication of the energy policy or the environmental or energy management systems' performance must be ratified by the EHS Department.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

5.5.4 On an annual basis external communication is undertaken through completion of the online workbook with Sustainable Energy Ireland (SEAI) whereby the actual Energy Performance at Saint-Gobain Construction Products (Ireland) Ltd. is reported for inclusion in the preparation of the Large Industry Energy Network (LIEN) annual report.

5.5.5 This annual reporting is completed using the secure web access link issued to all LIEN users on enrolment.

5.5.6 Annually, communication is undertaken through completion of the online portal for the Central Statistics Office's (CSO) Business Energy Use (BEU) Survey, communicating the quantities and cost of energies used.

5.6 Regulatory Authorities

The EHS Department must:

5.6.1 Prepare a summary report of the quantity of explosive used and blast monitoring results which is uploaded to the EPA's EDEN system on a quarterly basis.

5.6.2 Prepare a summary report for the mine (quarterly) and for the process site (biannually) and uploaded to the EPA's EDEN system.

5.6.3 Any environmental incidents are to be reported to EPA as outlined on EDEN portal as soon as reasonably practical. Include details of any non-compliances in the Annual Environmental Report (AER).

5.6.4 Record details of complaints (where they arise). Complaints received by Saint-Gobain Construction Products (Ireland) Ltd. are not included in the EDEN system. Complaints may be received by phone, email or directly via the reception. The EHS contact details are available to the public on signage on the perimeter fence at the front of the process and mine sites.

5.6.5 Ensure the AER is forwarded to the EPA on or before March 31st every year.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

5.6.6 Notify the following bodies in the event of an emergency situation which has the potential to have significant environmental impact

- Kingscourt: Meath County Council
- Knocknacran/Drummond: Monaghan County Council
- The Inland Fisheries Board
- The EPA
- Irish Water

5.7 Monaghan County Council

5.7.1 In accordance with planning permission PI 18/5/67892 the following information is submitted to Monaghan County Council (civic offices located in Carrickmacross) on a monthly basis.

- Condition 2 water levels in observation boreholes M101P, M102P & M103P (See map number KCENVMN16)
- Condition 4 (b) (iii) The 24 hour noise level records for monitoring stations MS1, MS2 and MS3 (See map number KCENVMN 11)
- Condition 7(b) Results for dust monitoring at stations MS1, MS2, and MS3 (See map number KCENVMN11)

5.8 Communication of Material changes to the activity.

5.8.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a material change or increase in:

- The nature or quantity of any emission,
- The abatement / treatment or recovery systems,
- The range of processes to be carried out,

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

- The fuels, raw materials, intermediates, products or wastes generated, or
- No changes in the site management or controls with adverse environmental significance shall be carried out or commenced without prior notice to, and without prior written agreement of, the agency.

5.8.2 In the event of a material change to the activity the EHS Department will ensure that an environmental impact assessment is completed.

5.8.3 Completion of the EIA will establish if completion of KCENV 37 is required.

5.8.4 The EHS Department will also ensure that the appropriate communications to the agency are completed.

5.9 Notification requirements within the Green House Gas Permit.

5.9.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a material change or increase in:

- The nature or functioning of the installation
- The capacity of the permit as detailed in the permit,
- The fuels used in the installation,
- The range of activities to be carried out at the installation
- That may require updating of the GHG permit shall be carried out or commenced without prior notice to and without the prior written agreement of the agency

5.9.2 Notification is required in writing of the cessation of all or part of any plant listed in table 1 of the permit no later than one month from the date of cessation.

5.9.3 Notification is required for installations or part of installations which have not come into operation (during permit application). Saint-Gobain Construction Products (Ireland) Ltd.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

must notify the agency of the date of commencement of the activity within 7 days of commencement.

5.9.4 Notify the agency in writing within three days of becoming aware of any factors which may prevent compliance with the conditions of the permit.

5.9.5 The Operations Director will also ensure that the appropriate communications to the agency are completed.

5.10 Classification of Environmental incidents

5.10.1 Details of incidents must be submitted to the EPA via the EDEN system.

5.10.2 All reported incidents shall be ranked into one of the rankings listed in the table below.

5.10.3 An incident is typically defined as:

- (i) An emergency
- (ii) Any emission which does not comply with the requirements of the licence
- (iii) Any exceedance of the daily duty capacity of the waste handling equipment
- (iv) Any trigger level specified in the licence
- (v) Any indication that environmental pollution has, or may have, taken place.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

Table 1 Environmental Impact Assessment Criteria

Ranking	Classification	Impact on the environment
1	Minor	<ul style="list-style-type: none"> No contamination, localised effects Minor effect on air quality as evidenced by dust or odour complaint(s) ELV breaches An emission which does not comply with the requirement of the licence/COA (A pattern of repeated minor incidents should be taken into account when considering the level of response)
2	Limited	<ul style="list-style-type: none"> Simple contamination, localised effects of short duration Local limited impact to water, land and air Notification to and short term closure of potable water extractors required
3	Serious	<ul style="list-style-type: none"> Simple contamination, widespread effects of extended duration Significant effects on water quality Major damage to an ecosystem (e.g. significant impact on fish population) Longer term closure of potable water extractors Significant reduction in amenity value Significant Damage to agriculture or commerce Significant Impact on man
4	Very Serious	<ul style="list-style-type: none"> Heavy contamination, localised effects of extended duration
5	Catastrophic	<ul style="list-style-type: none"> Very heavy contamination, widespread effects of extended duration

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

5.11 Saint-Gobain Environmental and Site Risk Reporting Requirements

5.11.1 All major incidents and enforcement notices must be reported to the business Managing Director. Details must also be circulated to the group health and safety manager and the Gyproc activity Environmental advisor. Reference Saint-Gobain Standard 7

5.11.2 Examples of Major Incidents Requiring Notification include:

- Explosion causing a rupture of vessel or pipe.
- Failure of a lifting device causing the load to fall.
- Overturn of any mobile plant.
- Fracture of live services pipes or cables by excavation or any other means.
- Striking live overhead electrical services or cable.
- An incident causing a loss by damage or business interruption of over €75,000.
- A major pollution incident resulting in losses of hazardous materials to air, water or ground on or off site of substances likely to cause harm to the environment that may require 3rd party remedial action.
- Any other incident, which results in the evacuation of personnel not including a false alarm or a fire, that takes less than 15 minutes from discovery to extinguish.
- Collapse of structure, buildings, silo, large scaffold etc.
- Any unplanned movement of ground, including landslide or roof fall in work areas.
- Large scale release of flammable substances.
- Any incidents likely to cause adverse public/media attention and/or reporting.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

- Any enforcement notices, prohibitions or prosecutions issued by National or Local Safety, Health, Fire or Environmental Enforcement Agencies should be notified via the Immediate Report Incident.

5.11.3 All EvE 1 and EvE 2's must be reported to the group health and safety manager and the Gyproc activity Environmental advisor. Reference Saint-Gobain Environmental Standard 1 (version 2).

5.11.4 The EHS Department will report on environmental performance to the Operations Director on a monthly basis.

5.11.5 The Operations Director will instruct the EHS Department to report on EvE indices/ Major incidents as appropriate using Health and Safety Standard 7.

5.12 Review of Communications

5.12.1 Environmental and Energy Communications are discussed at the annual management review meeting.

5.13 Using the Eden system

5.13.1 The EHS Department is the administrator for the site and can grant access to users as required.

5.13.2 Logon to the EDEN system at <https://www.edenireland.ie> using your email address and password.

5.13.3 Under EDEN applications click Licensing Management Application

5.13.4 Click on 'Licences' at the top of the page.

5.13.5 Click on the circle shown below, this will take you to the overview page for licence number P0519-(current number)

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

Show 10 entries Search:

Licence	County	Reg Number	Status	Date of Application	Commencement Date	
Saint-Gobain Construction Products (Ireland) Limited	Monaghan	P0519-02	Replaced		18/02/2005	
Saint-Gobain Construction Products (Ireland) Limited	Monaghan	P0519-03	Licensed		30/07/2015	

Showing 1 to 2 of 2 entries First Previous 1 Next Last

5.1.1 From this page you can report and manage incidents reported to the agency, requests for approval and you can also upload monitoring reports.

5.1.2 Click the appropriate button on the screen and follow the prompts; selecting the most appropriate description at each stage.

Subject	ENVIRONMENTAL & ENERGY COMMUNICATIONS		
Owner:	McEntegart, Patrick	Document No. Ene-Doc-14	Kingscourt ✓
Compiled By:	C McCullagh	Rev. 1	Head Office
Date of Issue:	17/02/2025 00:00:00		Mining

- 5.1.3 All incidents must be investigated in accordance with Env-Proc-9. All relevant findings planned corrective actions and preventative actions must be uploaded to the EDEN system as soon as practicable after the incident occurs. Minor incidents should be closed out within two months of being noticed.
- 5.1.4 File communications to the EDEN system in hardcopy in the communications folder and in soft copy to V:\Environmental\EPA communications (select the current year)
- 5.1.5 Incoming communications received from the EPA are also received through EDEN. The EPA may raise a request for information, approvals or compliance investigations using the EDEN system. Where a response is required, this will be indicated by the EPA.

Uncontrolled when Printed

Indicator	Definition	Non-exhaustive list of examples
EVE 1 Major Incident/Accident	Loss of Permit, Licence, Consent or Authorisation (temporary or permanent); Prosecution, Financial Penalty or any Enforcement Action; Formal warning or demand for action from regulatory authority (written or verbal); National or International Media impact (includes NGO's or other stakeholders); Impact out of the zones of activity of the site that requires emergency action or the deployment of an emergency plan in order to limit or treat the impact; Environmental impact that causes major pollution/contamination to occur; Failure to ensure the correct Permits/Consents/Licences/Authorisations are in place; Unless there are <u>exceptionally mitigating circumstances</u> , normally any chemical or fuel spill >1000 litres should automatically be classified as an EVE1.	Any incident that has caused major pollution or contamination of air, land, water and/or groundwater; Improvement Notice or letter from the Regulatory Authority warning of the need for improvement or demanding action following an incident; Suspension or prohibition notice issued; Changes made on site that require amendment to existing authorisations or new permits/consents – but appropriate authorisation has not been obtained; Major damage caused to a nearby protected habitat or species.
EVE 2 Significant Incident/Accident	Any non-compliance event (not already covered by EVE 1) that needs to be reported to the Regulatory Authority; Impact within the zones of activity of the site and requiring the: Activation of an existing emergency plan; or Use of unplanned techniques or external means to limit or treat the impact; Impact out of the zones of activity of the site that does not require emergency action and does not cause major pollution or contamination; Local media attention/community complaints as a result of our Activities.	Statutory non-compliance requiring a declaration to the Regulator e.g. breach of consented emissions (reportable) due to failure of dust abatement plant; Complaint from the local disposal/recycling operator or haulage contractor due to problems with waste from a Saint-Gobain site; Complaints from neighbours (odour, noise, dust, vibration, light pollution etc).
EVE 3 Moderate Incident/Accident	Impact within the zones of activity of the site that requires the use of planned techniques (e.g. Standard Operating Procedures) to limit or treat the impact Non compliance event that is not reportable to Regulatory Authority Any other environmental incidents not already covered in EVE1 or EVE2	Exceedance of emission limits (non-reportable) during a start up or shut down event; Moderate or minor spillage contained on site within zone of activity; Wind blown dust from outdoor gypsum stockpile that does not result in a complaint from the public or Regulator.
EVE 4 Near Miss (NM) & Significant NM	Significant near misses (SNM) that almost resulted in EVE 1-2 above Other environmental near misses with the potential to result in EVE 1-3 above.	Tanker delivery hose connected to the wrong tank – but no delivery of material; Bund ² identified as full, but not overflowing during routine inspection; Forklift has to swerve to avoid puncturing an IBC/SBC that is sitting next to a drain leading to the local river; Contents from bulk chemical or fuel tank lost but retained in bund; Loss of chemical, fuel or pollutant that could have been EVE 1 or EVE 2, but that is identified and prevented by luck/good fortune.
EVE 5 Poor Environmental Acts or Conditions	Poor Environmental Acts, conditions, circumstances or behaviours Wastage of resources – energy, water etc Non-conformance with site policy or procedures not already covered by EVE 1-4	Filling hose left outside bunded area; Oil drum left in an area where it could be knocked over/damaged; Operator leaving the lid off a drum full of oil or chemical; Poor housekeeping standards; Operator not properly reviewing continuous monitoring data; Environmental abatement equipment operating below design parameters; Lack of waste segregation bins in an area where wastes are generated; Poor labelling of chemical or fuel tanks or waste bins (no legal requirement).