Environmental Management System Summary

Home Farm Grange

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CONTENTS

1. INTRODUCTION 1
2. LAYOUT OF THE EMS 1
3. CONTEXT OF THE EMS 1
4. MANAGEMENT OF THE EMS 1
5. POLLUTION PREVENTION PLANNING 1
6. COMPETENCE AND AWARENESS 1
7. COMMUNICATION 1
8. RECORDS AND CONTROL OF DOCUMENTS AND DATA 1
9. OPERATIONAL PLANNING AND CONTROL 1
10. EMERGENCY PREPAREDNESS AND RESPONSE 1
11. MONITORING AND MEASUREMENT 1
12. INTERNAL AUDIT 1
13. MANAGEMENT REVIEW 1
14. IMPROVEMENT 2
15. SITE CLOSURE AND DECOMMISSIONING 3

Acronyms and Abbreviations

Name	Description
AD	Anaerobic Digestion
EA	Environment Agency
EMS	Environmental Management System
TCM	Technical Competent Manager

1. INTRODUCTION

This document has been prepared for Engie Renewable Gases Ltd (hereafter referred to as '*Engie'*) and forms an Environmental Management System (EMS) Summary in support of a bespoke permit application for the proposed operation of an agricultural anaerobic digestion (AD) facility located on land east of A162, Low Farm, South Milford, Sherburn in Elmet, LS25 6FW.

The EMS will set out how the environment will be managed on site in accordance with their Environmental Permit and the Environment Agency Guidance '*Develop a management system: environmental permits'* (available at https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) ('EA Guidance'). The EMS explains what happens at the proposed AD Facility to ensure the following:

- The environment is protected from adverse impacts from the activities;
- The organisation is protected from environmental conditions such as floods or droughts;
- The Permit and environmental legislation is complied with;
- The sustainability of the operations is addressed; and
- Environmental information and performance is communicated to relevant interested parties.

This EMS will be developed and maintained by Engie and will be generally based on the framework for BS EN ISO 14001:2015 '*Environmental Management Systems'* ('ISO 14001').

2. LAYOUT OF THE EMS

The EMS will be laid out in a similar fashion to ISO 14001, focusing on a 'Plan-Do-Check-Act' cycle of management and control. Each section is briefly summarised in this document with reference to the requirements of the EA Guidance for clarity. The section headings are as follows:

- Risks and opportunities;
- Management of the EMS;
- Pollution prevention planning;
- Competence and awareness;
- Communication;
- Control of documents and data;
- Operational planning and control;
- Emergency preparedness and response;
- Monitoring and measurement;
- Internal audit;
- Management review;
- Improvement;
- Site Closure and Decommissioning.

3. CONTEXT OF THE EMS

The level of detail and complexity of the EMS will be determined using a life cycle approach based on compliance obligations, interested parties, internal and external issues and other issues and requirements such as the outcome of audits and management reviews.

Risks and opportunities associated with the environmental performance of Home Farm Grange AD Facility will be identified and recorded in the initial stages of the EMS design in order to prioritise significant environmental risks, consider the benefit of opportunities and have a thorough understanding of the scope of environmental protection required.

4. MANAGEMENT OF THE EMS

Managers of the Home Farm Grange AD Facility take their responsibility for environmental compliance and sustainability very seriously. To ensure commitment from all levels and functions of the business, the EMS will include an organisation chart, details on the organisational arrangements, a copy of the environmental policy and associated strategic plans.

Engie are keen to identify opportunities to prevent or mitigate adverse environmental impacts and enhance beneficial environmental impacts, particularly those with strategic implications, to remain effective in anaerobic digestion activities. Environmental management is therefore integrated into business processes, strategic direction and decision making, aligning it with other business priorities.

5. POLLUTION PREVENTION PLANNING

The following aspects of the business have been included in the environmental risk assessment, sourced from site plans and specialist reports:

- Authorised activities;
- Details of site drainage for surface water, foul and combined;
- Locations for mains water, gas and electricity supplies, where applicable;
- Buildings, relevant plant and equipment and security fencing;
- Storage facilities for waste materials;
- Spill kit locations and drain protectors;
- Emergency service routes in and out of the site;
- Pollution control inspection and monitoring points;
- Surface / foul water discharge points; and
- Vulnerable locations.

6. COMPETENCE AND AWARENESS

A training matrix will be in place to ensure that each member of staff that can affect the environmental performance of Home Farm Grange is competent based on their training, education and experience as appropriate. Records of training sessions and qualifications will be maintained as part of the EMS.

The training matrix details who the Technically Competent Manager (TCM) is for the site, who is responsible for various environmental procedures and which staff roles are relevant to the conditions of the Environmental Permit.

A procedure will be established for checking the training and qualifications of external providers in advance of carrying out work on site. They are provided with the information necessary to work in accordance with any future Home Farm Grange Environmental Permit.

7. COMMUNICATION

Communication with relevant interested parties will be determined based on the information that needs to be communicated and the associated circumstances. Different types of communication will be considered in order to promote understanding of the EMS and engagement with interested parties at all levels.

Staff will have access to the EMS and are required to understand their duties and responsibilities as part of induction and ongoing training.

A process will be established for receiving communications from and responding to internal and external communications, taking into account the needs and expectations of the interested parties.

Complaints will be managed and recorded using procedures that lay out how complainants should be communicated with and how their complaint must be investigated.

To aid public awareness of the nature of the site, a noticeboard will be displayed by the entrance that provides the essential site details and Environmental Permit authorisation with the Environment Agency's emergency number.

8. RECORDS AND CONTROL OF DOCUMENTS AND DATA

Documented information for the EMS will be developed, maintained and controlled to ensure effective operations. Records required by the Environmental Permit will be managed according to processes described in the EMS, including a list of their retention times. They include the following documents:

- Environmental Permit;
- Senior Manager Commitment;
- Compliance Obligations;
- Duty of Care transfer notes for non-hazardous waste and consignment notes;
- Management plans and procedures, such as,
  - Accident Management Plan;
  - Odour Management Plan;
  - Site Condition Report;
  - Inventory of waste streams;
  - A product and residues management plan;
  - Site infrastructure plans;
  - Environmental and Climate Change Risk Assessment;
  - Bioaerosol Risk Assessment
  - Operating Procedures;
  - A written procedure for proposing, considering and approving changes to procedures or infrastructure related to storing or treating waste or pollution control
- Sectoral Benchmarking review
- Staff Recruitment, Awareness, Competence and Training Matrix;
- Site and Equipment Maintenance Record;
- Records of compliance checks and audits, findings of investigations and actions taken;
- Records of complaints made, findings of investigations and actions taken;
- Audit Reports including findings and actions taken; and
- Management reviews and changes made to the management system.
- Inspection reports and daily site logs.

Data is protected through software and online security controls.

A Site Condition Report will be maintained that records the condition of land and groundwater as applicable throughout the life of the Environmental Permit, including:

- Incidents that took place before operations began;
- Protective measures taken to protect land and groundwater as applicable since operations began; and

- Measures to avoid pollution risk from the activities on site during operations.

9. OPERATIONAL PLANNING AND CONTROL

The AD Facility has been designed to accept approximately 100,000 tonnes per annum and proposes to accept a variety of green, agricultural and organic waste types suitable for anaerobic digestion. Much of this waste is odorous in nature and will be stored in a fully enclosed waste reception building, fitted with an odour control unit.

The site activities and processes will be conducted in a controlled way by identifying what types and levels of controls are needed where and for what purpose. The relevant procedures list the steps taken to prevent or minimize risks to the environment from each activity and process, with a focus on understanding the nature of the waste involved in each one. Staff and other interested parties will have access to all the documents they need and understand that to operate effectively the processes making up the EMS must be carried out as planned.

The operational controls consist of procedures, work instructions, physical controls and the use of competent personnel. The type of control used is based on the skills and experience of the people carrying out the operation, and its complexity and environmental significance. Steps to determine controls include choice of method and operating criteria (e.g. measurements, features on the plant), writing down how processes should be planned, carried out and controlled, designing documents such as records and reports and applying technological options such as automated systems and software. Requirements of the management plans produced for odour and accidents are captured in procedures and other measures taken on site to prevent pollution.

The EMS will house a full waste storage plan to effectively manage waste during its lifespan on site. The waste storage plan will include the following types and levels of control as required.

The waste storage plan and associated procedures include the following information for each area:

- Storage time and volumes for each type of waste (worst-case scenario);
- Control of storage limits, considering permitted volumes and odour emissions;
- Height of storage piles for each waste type, where applicable;
- Waste segregation, where necessary; and
- Waste acceptance procedures for all waste types, where applicable.

The controls will be monitored to check they continue to be effective, and action is taken if there are changes or improvements to be made.

Maintenance of site infrastructure and machinery will be carried out according to the manufacturers or supplier's recommendations using the appropriate instructions, guidelines and manuals.

Contingency plans will be in place for a robust response to minimise the impact on the environment of any breakdowns, enforced shutdowns and any other changes in normal operations, for example due to flooding or other extreme weather based on climate change knowledge and trends.

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10. EMERGENCY PREPAREDNESS AND RESPONSE

To ensure a comprehensive response to any emergency, consideration will be given to the initial environmental impact and the secondary environmental impact that could result, e.g. fighting a fire can lead to water and air pollution.

The scale of accident management covers incidents from spillages of digestate, wastes or specified chemicals to large-scale events such as floods that could endanger humans and the environment to a broader extent.

The Accident Management Plan details incidents or events that could result in pollution, including the likelihood of an accident occurring and the potential consequences, measures to avoid the accident happening in the first place, and corrective actions in the event an accident does take place. The following potential accidents have been considered as a minimum:

- Breach of Environmental Permit;
- Equipment breakdowns;
- Enforced shutdowns;
- Fire or risk of explosion;
- Vandalism;
- Flooding;
- Extreme weather based on climate change knowledge and trends such as heat waves, hot days and storms; and
- Other than normal operational conditions.

Accidents will be recorded, including any investigation and response.

To assist staff in the event of an accident, a record form and a list of emergency contacts and how to reach them will be included in the plan, and an up-to-date list of materials and substances stored. The Accident Management Plan will be reviewed annually or after any incident.

The emergency services will be aware of the activities on site and the clean-up cost will be covered by insurance. Staff will have access to site information remotely in the event they cannot get on site safely.

11. MONITORING AND MEASUREMENT

A monitoring and measurement plan will be in place to analyse and evaluate the environmental performance of the business. The environmental risks, compliance obligations and operational controls are taken into account when determining how monitoring and measurement will be carried out and how it will be recorded and communicated. Results are used to identify nonconformances, e.g. triggers that indicate a permit limit may be breached, look at performance trends and find opportunities for improvement.

12. INTERNAL AUDIT

A process will be established to evaluate the extent to which the organisation's compliance obligations are fulfilled, by conducting regular internal audits and providing information to management on the performance of the EMS.

The internal audit programme will be based on the environmental risks and opportunities, the results of previous audits, monitoring and measurement results and management reviews. Audit findings are captured in a report including action lists and action close-outs where appropriate.

13. MANAGEMENT REVIEW

Management reviews that include the environment on the agenda will be held regularly throughout the year to check compliance with the Environmental Permit, procedures and management systems. There will be an annual environmental management review with a fixed agenda to review the year's environmental compliance, suitability of the procedures and the adequacy and effectiveness of the EMS in achieving environmental improvements. This enables decisions on priorities and resources for the EMS to be balanced with other business priorities and resource needs.

Inputs to the management review include:

- Audit results;
- Fulfilment of compliance obligations;
- Data showing environmental performance trends;
- Status of corrective actions;
- Follow-up actions from previous management reviews;
- Responses to changing circumstances;
- Adequacy of resources; and
- Recommendations for improvement.

Outputs of the management review include:

- EMS suitability, adequacy and effectiveness;
- Opportunities for continual improvement;
- Need for changes to physical, human and financial resources;
- Actions related to changes;
- Actions related to integrating the EMS into business processes; and
- Implications for the strategic direction of the company.

The EMS will be reviewed and updated under the following circumstances:

- Changes made to the site, operations or equipment that affect permitted activities;
- After any significant accident, complaint or breach of permit; and
- After identification of a new environmental problem or issue with new control measures.

A record of changes to the EMS will be kept, including the following:

- Changes to the maximum amount of waste stored on site;
- New abatement or process equipment; and
- Implementation of significantly new or different control measures.

14. IMPROVEMENT

Improvement opportunities will be identified from the following EMS processes:

- Communication with interested parties including staff, customers and the authorities;
- Monitoring and measurement;
- Analysis of data and information relating to environmental performance;
- Evaluation of compliance obligations;
- EMS audits; and
- Management reviews.

The detection of non-conformities such as potential permit breaches or procedures not being followed is critical for improvement.

In the event of non-conformity, an investigation will be carried out to determine where the EMS needs improving and action will be taken to make the appropriate changes and eliminate the cause where possible so the incident will not re-occur. All changes are communicated to relevant staff and the relevant EMS training updated to reflect said changes.

Improvement findings from all sources will be fed back into the Plan-Do-Check-Act cycle for continual improvement.

15. SITE CLOSURE AND DECOMMISSIONING

Site closure and decommissioning of the site will be detailed within the sites full EMS.

A site closure plan will be maintained that demonstrates that the site can be decommissioned to avoid any pollution risk and return the site to a satisfactory state. The plan will be updated if any changes are made to the site.

When the time comes to surrender the permit, a closure and decommissioning plan will be provided to the Environment Agency demonstrating how the site will be returned to a satisfactory state with no long term pollution issues.