



## SHANNON FOYNES PORT COMPANY

HARBOUR OFFICE, FOYNES, CO. LIMERICK

### PORT ENVIRONMENTAL REVIEW SYSTEM (PERS)



## ENVIRONMENTAL REPORT 2025/26

(PERS SECTION 1.5)

# Shannon Foynes Port Company

Port Environmental Review System (PERS)

## Environmental Report 2025/26

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The Environmental Report was prepared in accordance with the EcoPort PERS Version 5, December 2016

## 1. INTRODUCTION

This Environmental Report has been prepared by Shannon Foynes Port Company (SFPC) to provide members of the local Community and wider public with information on the environmental issues and performance of ~~the~~ port operations at SFPC managed terminals at Foynes and Limerick.

The Report has been prepared in accordance with the requirements and guidance of the internationally recognised ECO Ports certification scheme for ports – Port Environmental Review System, PERS.

PERS has been developed specifically to address the specific environmental attributes of ports within Europe as part of an increasing recognition of the vital importance of ports and other marine terminals within the economy, together with the central role they can play in ensuring high levels of environmental performance within the transport and infrastructure sector.

Furthermore, continually developing understanding and awareness of the environmental importance of our coastal and estuarine environments, and the pressures on these important ecological habitats, has resulted in the increasing implementation of voluntary approaches to environmental management of port operations.

Shannon Foynes Port Company is a member of the "EcoPort" Network (<http://www.ecoport.com>), which is administered by the European Sea Ports Organisation (EPSO).

The EcoPort PERS has over the past 27 years been established as the only port specific Environmental Management standard and has been implemented to date by 31 ports throughout Europe.

A central requirement of PERS is the public availability of information on a ports environmental performance - this Environmental Report fulfils EcoPort requirements for reporting in a format that will be updated biennially.

The Report furthermore demonstrates the commitment of the Board, Management and Staff at Shannon Foynes Port Company to continual improvements in environmental performance in and around the ports at Foynes and Limerick through proactive environmental management of SFPC operations and encouragement of the activities of other port users.

An electronic version of the Report is available at [www.sfpc.ie](http://www.sfpc.ie).

## 2. SHANNON FOYNES PORT COMPANY

Shannon Foynes Port Company (SFPC) ([www.sfpc.ie](http://www.sfpc.ie)) is the second largest Irish Port Operator handling 8.2 (2023) million tonnes of solid and liquid cargo annually through the six terminals currently operational within the Shannon Estuary. The Company is Ireland's largest bulk port company, having a 64.53% share of the market (IMDO Ireland Transport Economist Vol 120 (April-May 2013-20)). Between the years 2012 and 2022, this annual share has averaged at 57%.

Shannon Foynes Port Company is a Tier 1 Port of National Significance. It is a Core Network Port within the Trans-European Transport Network (TEN-T). The recently launched Irish National Ports Policy defines Shannon Foynes Port Company as a Port of National Significance (Tier 1).

Shannon Foynes Port Company is a Commercial Semi State Port. It has statutory jurisdiction over all marine activities on a 500km<sup>2</sup> area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The company was formed in 2000, under Statutory Instrument 283/2000, resulting from the merger of the former Shannon Estuary Ports and Foynes Port Companies; these in turn were originally formed in 1996 following the Harbour's Act of that year, which provided for the establishment of statutory port companies, free to operate independently with a strong commercial remit, while ownership was retained by the State.

There are six terminals within its jurisdiction – Tarbert (Oil) and Moneypoint (Coal/Oil) Generating Stations, Aughinish Alumina Ltd (AAL) Refinery (bauxite, hydrate, and chemicals), Foynes, Shannon Airport (fuel) and Limerick. In addition, Tarbert has recently undergone modifications to facilitate the storage of 140,000 tonnes of fuel oil as part of the National Strategic Reserve.

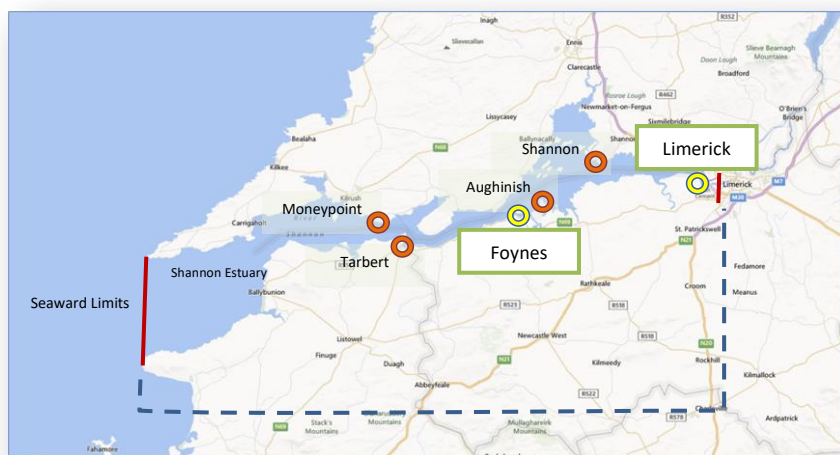


**Figure 1** Shannon Foynes Port – Extent of Jurisdiction

The Company specifically manages port operations at Foynes and Limerick.

SFPC handles trade from the many sectors critical to the on-going sustainability and competitiveness of the Mid West region. This includes staple traditional heavy industrial use to modern and emerging industries such as the energy, renewable, agricultural, tourism and manufacturing sectors. The volume of trade handled by the port in comparison to other Irish ports is summarised in Table 1.1.

Foynes Port has a long history, having first being surveyed in 1837, and is major deep-water seaport that caters for a wide variety of modes of trade including;

- dry bulk including fertilizers, animal feeds, salt, coal and alumina hydrate
- break bulk including, timber, construction materials, machinery and materials for the
- offshore industry
- liquids- primarily oils but also chemicals
- project cargoes including materials for the renewable wind energy industry
- cruise vessels

The total tonnage of cargo handled in 2023 was in the order of 1.93m tonnes.

Due to its favourable location on the west coast of Ireland and its modern deepwater facilities, Foynes Port is ideally positioned for additional European trading as well as for further increases in ocean energy resources.

Operations at Limerick docks also extend to the early 1800's - new wet docks were constructed during the 1820's to facilitate the import of timber, coal, iron and tar. Exports from Limerick included beef, pork, wheat, oats, flour and emigrants bound for North America during the Famine period.

Currently, operations at Limerick are chiefly associated with the export of cement, scrap metal, timber and logs, glass ~~and RDF~~. Imports are primarily ,and with the import of animal feed and fertilizers.

The total tonnage of cargo handled in 2023 was in the order of 647,000 tonnes.

Shannon Foynes Port Company launched its Masterplan - Vision 2041 – in February of 2013 which sets out the company's commitment to investing in infrastructure. Significant projects have already been delivered, including the joining of the West and East jetties in Q1 of 2024, involving the construction of an additional 117m of new quays and the associated infill behind the new quays. Adjacent Company lands have been developed as a port related industrial park, including the provision of access, utilities and flood mitigation measures. Substantial works have been completed to reinstate the rail network into the Port, with a direct link between Foynes and Limerick scheduled to re-open in 2027. —Substantial works have also been completed on a new road network that will link the Port to the National motorway network. The Port is currently developing plans for a new deepwater facility at Foynes Island that will facilitate the potential of the future ORE sector off the west coast of Ireland.

### 3. ACTIVITIES AT FOYNES AND LIMERICK PORTS

Activities at Foynes and Limerick Ports include the range of operations undertaken by SFPC, together with those of non-related third party organisations and companies who operate under lease or contract from SFPC.

**Foynes** is the principal deepwater general purpose terminal on the Estuary and caters for dry bulk, break bulk, liquid and project cargoes.

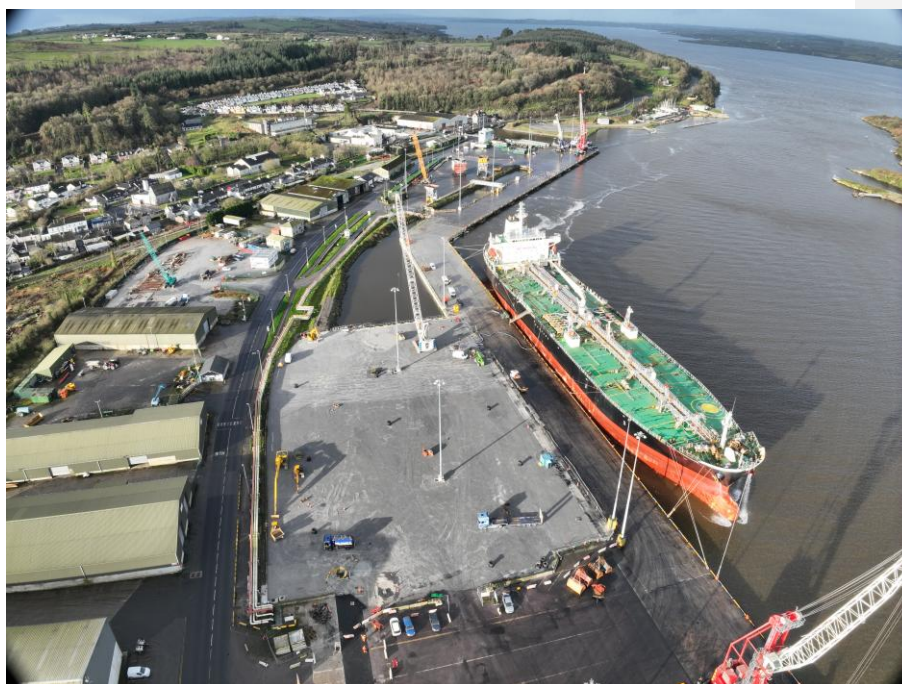


**Figure 2** Aerial Photo of Foynes Port showing 117m project to join West and East Jetties and associated infill.

Key details for Foynes are:

- Length of Jetties: West 293M; East 382M; Tanker 100 M
- Max length of vessel: 200 M (circumstances may allow greater)
- Max draught at berth: 10.5 M
- Max draught for channel from sea to berth: 7.8m + tide
- Max Beam: 32.3 M (daylight only at this beam)

- Unloading Rate: Depends on crane/material; see Cargo Handling Equipment and Storage pages for further details
- Bunker availability: By barge & truck
- Fresh Water: Yes
- Stores: Yes – no truck access to tanker jetty
- HFO Discharge: All pipes (oil & chemical) are 8 inch; rate 200 tph



**Figure 3** Aerial view of Limerick Port

**Limerick Port** is a general purpose terminal, some 100km upstream of the mouth of the Estuary at Limerick City, catering for dry bulk, break bulk, liquid and special cargoes.

Key details for Limerick are:

- Total Quay length: 914M
- Max length of vessel: 152 M
- Max draught at berth: Tide dependent
- Max draught for channel from sea to berth: 1.2 M + tide – 0.5M
- Max Beam: 19M
- Cargo Handling: see Cargo Handling Equipment and Storage pages for further details
- Bunker availability: By road
- Fresh Water: Yes
- Stores: Yes

At both Foynes and Limerick sites, SFPC have responsibility for the loading and unloading of cargo, together with the provision of associated services including power, water, security, access control and storage.

#### ***Associated Activities***

##### ***Limerick Cargo Handling***

Limerick Cargo Handling (LCH), which provides a full range of logistics services, is a fully-owned subsidiary of Shannon Foynes Port Company, and is the main provider of stevedore services at Limerick Dock.

### **Storage & Warehousing**

SFPC provides a range of storage facilities at its Limerick and Foynes facilities to facilitate traders. On-quay and near-quay open storage is available, together with a range of warehousing solutions available for short or long-term letting. Facilities include:

- 130,000 ft2 of warehousing at Foynes, including 75,000 ft2 of new purpose-built bulk storage
- 61,000 ft2 of warehousing at Limerick Docks, including 30,000 ft2 of new purpose-built bulk storage
- On-quay storage at Limerick Docks
- Substantial open storage at Foynes

### **Water Plant Services**

SFPC makes its multi-cat vessel available for third party use.

### **Other Port Users**

Lands at both Limerick and Foynes facilities are provided under short and long term leasehold to a range of port and cargo related activities including:

- *Fertiliser*
- *Animal Feeds*
- *Fuel Storage*
- *Marine Engineering Services*
- *Coal Storage*
- *Warehousing*
- *Construction Materials*
- *Frieght*
- *Manufacturing/Fabrication*
- *Renewable Energy (Turbine components) storage*
- *Offshore Suport Services*
- *SAR Base*

A number of these activities are carried out on sites which are Freehold, but fall within the perimeter of the SFPC Site.

The companies occupying the various sites do so under lease from SFPC, who have overall responsibility for the site infrastructure (roads/drainage/perimeter/water supply) site security and

traffic management. The individual companies however have sole responsibility for compliance with relevant environmental legislation.

For example, a number of companies operating from SFPC lands in Foynes are licensed or regulated by the Local Authority (Limerick City & County Council) , Environmental Protection Agency (EPA) or Health and Safety Authority (HSA) under a range of measures as follows:

**Commented [MK1]:** For MG - I have included some of the references to specific licences - assume sufficient?

**Commented [MG2R1]:** Nothing to add Mick.

***Limerick County Council – Licences under Section 4 of the Local Government Water Pollution Acts 1977 - 2007 to Discharge Trade Effluent or Sewage Effluent to Waters***

| Name                         | Discharge Licence Register No. |
|------------------------------|--------------------------------|
| Atlantic Fuel Supply Co. Ltd | W109                           |
| CPL Fuels Ireland Ltd.       | W119                           |

***Limerick County & City Councils – Waste Facility Permit***

| Name                      | Waste Permit Register No.   |
|---------------------------|-----------------------------|
| Niaron                    | COR/L/2024/229              |
| United Metals *           | WFP/L/2023/195/R1           |
| Limerick Metal Recycling* | WFP/L/2024/10/0001/01/R8/71 |

\* Both at Ted Russell Docks, Limerick

***Environmental Protection Agency – Dumping at Sea***

| Name                        | EPA Licence Register No. |
|-----------------------------|--------------------------|
| Shannon Foynes Port Company | S0009-02                 |
| Aughinish Alumina Limited   | S0026-02                 |

***Health & Safety Authority – Control of Major Accident Hazards Involving Dangerous Substances Regulations (Seveso II)***

| Name                              | Establishment Cat. |
|-----------------------------------|--------------------|
| Atlantic Fuel Supply Company Ltd. | Upper              |

#### 4. SFPC ENVIRONMENT & ENERGY POLICY STATEMENT

| SFPC EHS Policy        |                          | Environment & Energy Policy |             |
|------------------------|--------------------------|-----------------------------|-------------|
| Doc No: EHS/093        |                          | Rev No.: 01                 | Page 1 of 1 |
| Issue Date: 19.01.2021 | Written by: M. Geoghegan | Approved by: P. Keating     |             |

Shannon Foynes Port Company (SFPC) is the Port Authority with Statutory responsibility for commercial maritime activities within the limits defined in the Harbours Acts and associated amendments.  
It is the policy of this company to implement and maintain, in so far as is reasonably practicable, systems and procedures to prevent or reduce maritime activities and actions that pose a threat or have a negative impact on the natural environment.

SFPC will;

- Develop and implement an integrated Management System which incorporates environmental & energy management that is appropriate to the nature, scale and impacts of our activities or services and in accordance with associated certification standards.
- Comply with statutory, non-statutory and best practice obligations as assigned by legislation, shareholder and industry best practice, in so far as is reasonably practicable
- Consult with employees, tenants, contractors and other interested parties on environmental & energy related matters and encourage participation in management programs and promoting a positive culture within the scope of SFPC responsibilities.
- Support the SFPC Energy Performance Officer (EPO) who will, in so far as is reasonably practicable, maintain Energy Management objectives agreed by Management and report directly to the CEO.
- Work to prevent environmental accidents and maintain a high level of preparedness to reduce the effects of accidents or incidents that occur.
- Evaluate and regularly review, environmental risks associated with the company's activities, documenting programs to eliminate or reduce, in so far as is reasonably practicable, any risks identified.
- In so far as is reasonable, purchase energy efficient products and services and design for energy performance improvement.
- Promote continual improvement through an ongoing program of monitoring and measurement and where required establish objectives and targets designed to promote improvement and efficient energy utilisation to reach national climate action and public sector energy efficiency targets.
- Support the provision of necessary resources to ensure the environment and energy policy is realised.
- Review this environmental & energy policy on a regular basis and/or where the business changes in nature, scale or size.
- Make available to stakeholders and the general public the PERs environmental report demonstrating sustainable development and environmental protection measures adopted by SFPC.

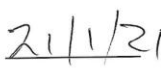
Copies of this Policy are made available at company locations and available to interested parties upon request.

The allocation of duties for environment & energy matters and particular arrangements to implement this policy are set out in the SFPC Integrated Management System Manual.

Responsibility for implementation and communication of the environment & energy policy and associated documentation lies with the Chief Executive Officer, the Board of Directors and Management team general, who will, in so far as is reasonably practicable, ensure the objectives of this policy are achieved.



Pat Keating  
Chief Executive Officer



Date

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Page 1 of 1

**Commented [MG3]:** Mick, I've submitted a DCO to renew the approval date on this policy. No change to content.

## 5. ENVIRONMENTAL MANAGEMENT AT SFPC

Shannon Foynes Port Company has adopted a structured approach to the management of its activities and operations throughout the Estuary.

SFPC has elected to use a formal system in order to facilitate the management and development of the company. This system is based on an integrated model and as a guiding principle the understanding and delivery of its Customer and/or interested parties' requirements is key to attaining its short and long-term objectives. Current standards include:

- ISO 9001:2018
- ISO 45001:2018
- Port Environmental Management System (PERS)

In consultation with our external certification support SFPC are also committed to a suitable management of change program to meet the requirements of ISO 9001:2015

The core values of the Integrated Management System revolve around risk management. The management system is designed to meet the risk appetite of the company which is defined in the Board approved Risk Management Policy.

The management system is also established in line with the requirements of ISO 9001:2008 & ISO 45001:2018. SFPC are also committed to a suitable management of change plan to meet the requirements of ISO 9001:2018

The system is structured in three main tiers:

- Tier one: Organisational Policy & IMS manual
- Tier two: Procedures, Flowcharts
- Tier three: Forms and other supporting documents.

Commented [MK4]: Assume still holds true?

Commented [MG5R4]: Yes. No change

Within the overall management framework of the Company, environmental considerations are incorporated within day-to-day operations through procedural controls (SOP's) and through a structured assessment of the environmental risks.

These risks are ranked and provide a framework for monitoring and management of activities so as to reduce the level of risk. Comprehensive monitoring programmes are in place for key environmental parameters, including noise, dust and water.

This approach currently forms the basis for the implementation of PERS within Shannon Foynes Port Company.

Significantly, the management of activities and operations within Shannon Foynes Port Company takes places within the overall context of a Corporate Social Responsibility (CSR) Policy, which is approved at Board level.

The Policy sets out the key management areas for the Company, in terms of CSR, as:

- *Health & Safety*
- *Environment*
- *Community*
- *Marketplace*
- *Workplace*

Specifically, the CSR Policy provides over-reaching policy objectives for environment in terms of:

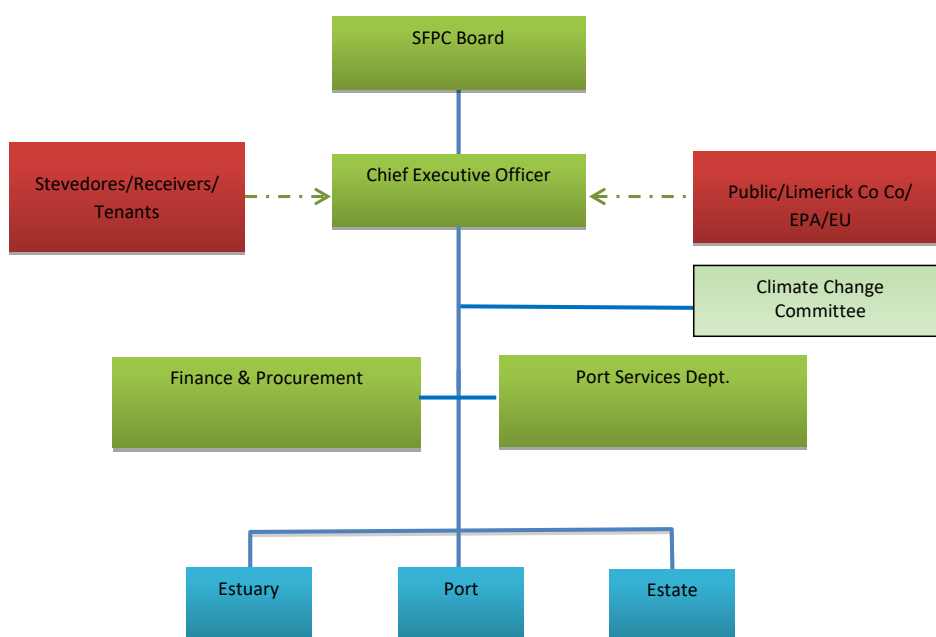
- *Commitment to environmentally responsible actions in energy efficiency, conservation, risk management, emergency planning and responsible waste management*
- *Encourage wide consultation, dialogue and cooperation between port users and stakeholders to facilitate sustainable economic development*
- *Embracing new technologies and management systems to assess and minimise the company's 'Carbon Footprint'*
- *Implementation of effective management systems (PERS) as a key component of business to drive continual improvement in environmental performance*

Related objectives under the CSR Policy address Community and Neighbour relationships.

#### Environmental Management Structure and Responsibilities

The overall organisational structure having regard to environmental issues is shown below:

**SFPC Environmental Organisation Chart**



**Key Environmental Responsibilities at SFPC**

**Commented [MK6]:** Have amended - but open to corrections as necessary?

| Functions                                         | Job Title or Name               | Department         |
|---------------------------------------------------|---------------------------------|--------------------|
| Port Operations (Dredging)                        | John Carlton                    | Port Services      |
| Port Operations (Navigation)                      | Michael Kennelly                | Port Services      |
| Port Operations (Shipping)                        | Michael Kennelly                | Port Services      |
| Port Operations (Terminals)                       | John Carlton                    | Port Services      |
| Cargo Handling Operations                         | John Carlton                    | Port Services      |
| Jetty/Wharf Management                            | John Carlton                    | Port Services      |
| Site Management                                   | John Carlton                    | Port Services      |
| Strategic Planning                                | Pat Keating                     | CEO                |
| Supplies acquisition                              | Alma Moran                      | Port Services      |
| Licensing/Permits/Third Party Liaison             | John Carlton                    | Port Services      |
| Quality Management                                | Martin Geoghegan                | Compliance Officer |
| On site Contractor Management                     | John Carlton                    | Port Services      |
| Emergency Planning                                | Michael Kennelly                | Port Services      |
| Waste Management                                  | John Carlton/Michael Kennelly   | Port Services      |
| Marina / Slipway management                       | John Carlton / Michael Kennelly | Port Services      |
| Environmental Document Management                 | Aoife Lenihan                   | Port Services      |
| Environmental Data Management                     | Aoife Lenihan                   | Port Services      |
| Soil pollution assessment                         | John Carlton                    | Port Services      |
| Air Quality monitoring                            | Michael Kennelly                | Port Services      |
| Water Quality monitoring                          | Alma Moran                      | Port Services      |
| Energy and Carbon Footprint monitoring            | John Carlton                    | Port Services      |
| Noise management                                  | John Carlton                    | Port Services      |
| Vehicular Management of Terminal traffic/Security | John Carlton / Michael Kennelly | Port Services      |
| Port Construction/ Development                    | John Carlton                    | Port Services      |
| Environmental Monitoring                          | John Carlton / Michael Kennelly | Port Services      |
| Ecological Designations (SAC)                     | John Carlton                    | Port Services      |
| Environmental Training                            | John Carlton                    | Port Services      |
| Climate Change Management                         | Climate Change Committee        | All Departments.   |

### Environmental Targets and Continuous Improvement

Shannon Foynes Port Company is a Commercial Semi-State. Ownership ultimately lies with the State and oversight for the State (the Shareholder) is provided by the Department of Transport. Other key Departments include the Department of Climate, Energy and the Environment, the Department of Enterprise, Tourism and Employment, and the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitisation.

The management of SFPC conduct regular meetings with the Shareholder to provide assurance that the Company is being managed in line with Government Policy.

The key policy at this time is the Government Climate Action Framework for the Commercial Semi-State sector. The two key targets are a 51% reduction in greenhouse gas emissions by 2030 and net-zero emissions by 2050.

SFPC has engaged the services of external expertise to assist in the transition and is currently implementing a range of initiatives to ensure that the 51% reduction is met by the required target date.

Initiatives to date include:

- a. Retrofitting of existing office spaces to increase energy efficiency.
- b. Electrification of the SFPC fleet of company vehicles.
- c. Introduction of Solar PV to power office and canteen spaces.

A critical element will see the changeover of marine craft to alternate fuels. SFPC has engaged with engine manufacturers and has identified that HVO is suitable for use on both the company pilot boat and multicat workboat. Once a secure supply chain for HVO is secured, SFPC will commence this transition.

Continuous Improvement (CI) is a critical element of all SFPC operations, including Environmental management. CI is driven by way of lessons learned, feedback from Customers and the General Public, and a well embedded audit system.

SFPC has identified a number of Environmental Risks. These are managed as an integral part of our overall Integrated Management System. An extensive audit and review process is conducted on an ongoing basis. The overall system is subject to external audit and re-certification on an annual basis.

As both Foynes Port and TRD Limerick are located immediately adjacent to residential populations, fugitive dust is recognised as a key Environmental metric. On the basis of past incidents, including issues that have an adverse effect on our neighbours, SFPC has implemented a number of improvement programmes. These include:

- a. Retrofitting bulk cargo handling hoppers with dust suppression systems.
- b. Investment in water cannons that are deployed to limit fugitive dust.
- c. Proactive engagement with Stevedores to ensure that suitable measures are agreed and implemented in advance of any issue arising.

A significant development has seen the introduction of a new Environmental Management Plan (EMP) element when Stevedores are booking bulk solid discharges. Stevedores are required to upload an EMP onto the Port Management portal (CargoPro), detailing the measures they intend to deploy. Where SFPC considers that the

measures are not adequate, feedback is provided to the Stevedore. During discharge operations, the Stevedore is expected to actively manage the operation, including deploying additional control measures as necessary. Berth allocation is actively managed by SFPC to ensure that potentially sensitive cargoes are handled on berths where impact can be best managed.

### **Promoting Environmental Awareness**

As part of the overall Integrated Management System, SFPC has a number of forums for the dissemination of information, both internal to SFPC and also externally with Port Users and the wider public.

Internally, SFPC has a standing Safety Committee. All Incidents, including near-misses, that are raised on the reporting tool are discussed and addressed via this forum. This includes ENV related incidents.

SFPC also conducts regular (typically monthly) Management meetings and meetings specific to the Port Services Department. All incidents are raised and discussed at these meetings. Specific actions are also determined in response.

Externally, SFPC regularly meets with Port Users, and in particular the Stevedore group. These meetings address any issues or concerns.

SFPC meets with a representative group from the Local Community on an ad-hoc basis. ENV issues are a priority agenda item at these meetings.

In the past, fugitive dust was a recurring problem. SFPC has taken a proactive approach towards addressing this issue. In addition to considerable investment in equipment, SFPC has engaged with Stevedores to achieve greater 'buy-in' around the proactive management of bulk discharge operations. SFPC has also conducted training and workshops with personnel to educate around the issue.

SFPC promotes its activities via a number of means, including maintaining an active presence on social media. SFPC runs a competition for post-primary level schools on a 2-yearly basis, the COMPASS competition. The most recent edition concluded in April 2026. The competition is open to schools that border the Estuary and is intended to raise awareness around the importance of the Estuary, including the significant potential of the Estuary in assisting Ireland to meet Climate Targets. The theme for this edition was a short film competition with the title "Connecting our Future" that challenged entrants to explore the opportunities for the Estuary, particularly around renewables.

SFPC further engages with primary and secondary schools in the region, hosting regular visits and tours. SFPC also provides work experience opportunities for post-primary students completing transition year.

### **Future Proofing the Port**

SFPC is an active participant in a number of initiatives intended to ensure there is awareness and engagement around climate action, energy efficiency, resilience and sustainability.

The Ports Special Working Group, organised under the auspices of the Sustainable Energy Authority of Ireland (SEAI) is a port specific group that addresses a broad range of issues of interest to ports, including:

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a. Alternate fuels incl HVO, Hydrogen, Ammonia etc.

b. Onshore Power Supply (OPS)

c. Energy Efficiency

The Group seeks to engage with other public bodies and overseas Ports that have implemented initiatives including aorund alternate fuels.

SFPC is also a member of an OPS Working Group under the auspices of the Department of Transport. This WG keeps Ports updated aorund developments in both OPS and the wider alternate fuels sector. It seeks to connect Ports to funding and research opportunities. While SFPC does not currently meet the critieria around the provision of shore power facilities, SFPC has commenced engagement with key providers. In addition, the proposed new Port development at Foynes Island makes provision for OPS to be designed into the project.

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## 6. ENVIRONMENTAL PERFORMANCE AT FOYNES & LIMERICK PORTS

The Environmental Performance of the Company at Foynes and Limerick Ports is described in the following sections. The overall evaluation of performance is made based on an identification of the relevant Environmental Aspects, and assessment of their Significance.

### *Process for Identification & Evaluation of Environmental Aspects*

SFPC has a well-developed and structured approach to the management of its activities and operations. Risk Management is a fundamental component of the approach taken by SFPC to the management of all aspects of the business – from financial and commercial through engineering, human resources, quality, safety and environment.

Aspects are identified by a combination of developed processes including: Internal & external audits, Compliance and risks evaluations, EHS meetings and workshops, Accident/incident/Near Miss investigations, general communications (management, employees, port users, public).

Once identified, aspects (risks) are evaluated in a structured manner. SFPC use a consistent approach to risk assessment across the business units and it is this approach that has been used for assessment of Environmental Aspects.

The Assessment Method follows a 5 x 5 rating system using Likelihood (Probability of Occurrence) and Severity Criteria.

The Environmental Risk rating is illustrated on the risk matrix below and is processed using the SFPC RAMP – Risk Assessment Management Program (a software database).

### SFPC Risk Rating Matrix

|   | LIKELIHOOD                                                             | IMPACT     |                  |            |             |                   |
|---|------------------------------------------------------------------------|------------|------------------|------------|-------------|-------------------|
|   |                                                                        | 1<br>Minor | 2<br>Appreciable | 3<br>Major | 4<br>Severe | 5<br>Catastrophic |
| 1 | RARE:<br>Potential for occurrence in exceptional circumstances         | Very Low   | Very Low         | Low        | Low         | Medium            |
| 2 | UNLIKELY:<br>Unlikely, but potential for occurrence is reasonable      | Very Low   | Low              | Medium     | Medium      | High              |
| 3 | POSSIBLE:<br>Has occurred at least once (within 5 years)               | Low        | Medium           | Medium     | High        | High              |
| 4 | LIKELY:<br>Has occurred at least once (within 3 years)                 | Low        | Medium           | High       | Very High   | Very High         |
| 5 | ALMOST CERTAIN:<br>Occurs on a frequent basis (several times annually) | Medium     | High             | High       | Very High   | Very High         |

To ensure consistency across the organisation, the Company's Environmental Aspects have been evaluated using this approach, the output of the evaluation being a ranking as to the significance of all environmental aspects.

The Environmental Aspects identified as relevant to the activities at SFPC are tabulated below.

#### List of Environmental Aspects at SFPC

Commented [MK7]: Where can I check/confirm?

| Tag | Environmental Aspect                              |
|-----|---------------------------------------------------|
| A   | Air Emissions – Particulates                      |
| B   | Air Emissions – VOC's                             |
| C   | Aqueous Discharge / Surface Water                 |
| D   | Chemical Use                                      |
| E   | Contracted Services                               |
| F   | Water Use                                         |
| G   | Hazardous Waste – Liquid                          |
| H   | Hazardous Waste – Solid                           |
| I   | Noise & Vibration                                 |
| J   | Disposal of Solid Non-Hazardous Waste to Landfill |
| K   | Past Activities                                   |
| L   | Recycling                                         |
| M   | Transport                                         |
| N   | Visual Impact                                     |
| O   | Emergencies                                       |
| P   | Soil/Sediments                                    |
| Q   | Ecosystems - Marine                               |
| R   | Ecosystems - Terrestrial                          |
| S   | Construction Activities                           |
| T   | Maintenance Activities                            |
| U   | Energy                                            |

Scope

Only those Aspects within the direct control of SFPC have been considered for the continuing development of the PERS system. The functional areas and activities considered for Foynes and Limerick are:

1. Estuary
2. Port (including berths)
3. Estate
4. Projects
5. Emergencies

The Aspects are further described and evaluated in the Register of Environmental Aspects (Attachment 1).

In addition to meeting Statutory requirements, the priority for improvement plans is very much based on both the Integrated Management System, including the series of audits and findings from same, and also an intent that the Port will not impact adversely on the neighbouring Community.

Arising from both influences, the key areas identified for active management and improvement include;

Air Quality – with a particular focus on reducing fugitive dust emissions that impact the local Community.

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Noise – ensuring that operations are controlled and conducted in a manner that ensures they are not a nuisance.

Water Quality – ensuring that harmful discharges into the Estuary do not occur.

Waste Management – SFPC manages and coordinates all waste collection across all terminals, under a Plan approved by both the Department of Transport and the Department of Agriculture.

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Emergency Management – SFPC engages with Stakeholders, Port Users and the Principal Response Agencies to develop and implement suitable response Plans for potential scenarios across the Estuary, including both on shore and on water. This includes an Oil/HNS Response Plan that is subject to the approval of the Irish Coast Guard.

A summary of environmental performance at Foynes and Limerick sites include:

#### **Air Quality**

The Company has placed six dust monitors around the Foynes facility and have installed three monitors at the Limerick site. Sites at Foynes include off-site locations to ensure that impact on the neighbourhood is accurately tracked and addressed as required.

Dust monitoring is by Bergerhoff type gauges for evaluation of dust deposition on a monthly basis in accordance with Standard Method VDI2119 (Measurement of Dustfall, Determination of Dustfall using Bergerhoff Instrument (Standard Method) (German Engineering Institute) by an external contractor.

Although there are no statutory limits for dust deposition applicable to SFPC, in Ireland guidance on dust deposition defines nuisance levels dust at 350 mg/m<sup>2</sup>/d.

Monthly data is recorded, trended and included as a major KPI in the SFPC ISO 9001 QMS.

Where elevated levels of dust deposition arise, SFPC investigates to determine the cause and recommend corrective actions, if relevant.

This measurement system was introduced to measure and retain information in the event of complaints from stakeholders or neighbours.

Generally, levels of dust deposition are well below the levels which would give rise to nuisance (and complaints). This is due largely to work undertaken by SFPC on restricting the generation of fugitive dust emissions, by restricting operations at certain berths during certain wind conditions (Ref: [ESOP001 - Control of Dust Emissions from bulk cargo operations](#)).

A real-time monitoring station was installed in Foynes in february of 2025 to provide a better early warning detection system in the event of fugitive dust emissions. The data gathered from this site is under continuous assessment.

Over the past number of years SFPC has invested heavily in physical measures to reduce/prevent fugitive dust emissions during cargo operations. Two hoppers have been retrofitted with dust suppression measures. Water cannons have been purchased for both Foynes and Limerick and are available to deploy in the event that wind and environmental conditions or the nature of the cargo, lead to an increased risk of fugitive emissions.

SFPC is currently engaging with Stevedores at both Foynes and Limerick around the introduction of a more formalised system. This will require that Stevedores make provision for environmental controls when booking port handling equipment for bulk operations. The portal will allow for the booking of dust suppression hoppers and water cannons.

**Noise**

Although there are no statutory emission limits applied to SFPC in respect of noise, the company operates a policy of testing all plant equipment noise sources (cargo handling equipment) annually to ascertain the sound power level of each piece of machinery.

This work is carried out by the Port Services Department who keeps, on file, a record of each result. In this way we can track whether machines are producing noise profiles which deteriorate on an ongoing basis or otherwise – in which case remedial work can be carried out.

Noise measurements at various locations at both ports are compared against typical Planning and Environmental Standards applied in Ireland, as follows:

|            |            |
|------------|------------|
| Daytime    | 55dBA LA90 |
| Night-time | 45dBA LA90 |

Generally, noise levels during day time periods within the port itself (at the jetties) are within the range 35 – 49dBA during daytime periods, and 32 – 49dBA night time. Attenuation due to distance and other local screening has the effect of reducing these levels significantly at the Port perimeter and beyond.

Observations made during measurements have noted the contribution from road traffic along the N69 during all measurement periods.

Overall, port related noise recorded at NSLs during the survey complied with the EPA limit values. SFPC controls noise emission by limiting bulk discharge operations to the hours of 0600 – 2359hrs daily.

**Water Quality**

Discharges to surface waters from the jetties and shore side operations at Limerick and Foynes are due to rainfall - there are no discharges of trade effluent associated with the port activities.

Surface water runoff during rainfall events runs directly from the surface of piers and jetties in to the River Shannon. In the case of Foynes, runoff from the yard and estate areas is collected in a network of surface water drains, and conveyed to a point where it is discharged to the Shannon Estuary.

The River Shannon Estuary is classified as a transitional water body and is subject to a series of quality standards and classification based on the requirements of the EU Water Framework Directive, which is implemented in Ireland by the European Communities Environmental Objectives (SURFACE WATERS) Regulations 2009 – 2012.

Discharges of surface water runoff are not currently subject to Licensing in Ireland and, as the waste is taken to be clean runoff, no limits are required.

SFPC has a responsibility however to ensure that no potentially polluting substances enter the River Shannon from its facilities. Runoff from jetties is managed by ensuring that the potential for cargo spillages onto the jetty deck is minimised through good handling practice, together with good housekeeping and cleaning practices to ensure that minor spills for hoppers or grabs are swept up.

The requirement to collect and properly dispose of cargo residues on the jetties is the responsibility of both the ship and the Stevedores/Cargo Receivers. SFPC then clean and leave the berth in a clean condition so as to minimise the potential for cargo residue to become entrained in surface water runoff to the Estuary (Ref EHS 024 Waste Management Plan 2018).

In the context of shore based areas, SFPC have developed a plan for the upgrade of the drainage system by retrofitting interceptors on all discharges into the River Shannon within its control to ensure no polluted surface water enters into a water body. SFPC are upgrading all of our port roads with a biennial surface water drainage system to endeavour to achieve compliance with the relevant legislation, this includes all surface road run off directed through interceptors prior to discharging into a water body. Phase 1 and the East Jetty has been completed and Phase 2 is about to commence.

The Company has also written to all tenants and freehold property owners within SFPC estates, requesting that they demonstrate adequate levels of control of potentially polluting substances (such as oils and other chemicals) within their operations.

All future developments within SFPC facilities will be required to have current loss control and containment systems included at design stage, with the objective of preventing pollution entering the River Shannon.

To further reduce cargo waste after the completion of bulk discharge operations, SFPC has amended it's Waste Management Plan and has installed dedicated covered waste cargo receptors immediately adjacent to the quayside in both Foynes and Limerick. The immediate availability of these units reduces the handling of cargo waste and reduces the volume entering the water during berth cleaning operations.

Potable water supply within the Port is subject to very careful monitoring and is captured on the CMMS. All lines are flushed on a monthly basis with routines captured on CMMS. An annual test is conducted or more frequently if required. There is also a specific regime around Legionella disease. A total of ten (10) sample points are monitored across both Foynes and Limerick.

### **Waste Management**

SFPC have prepared a comprehensive Waste Management Plan (WMP), which was most recently approved in July 2022.

The new Plan, now developed with a waste contractor in 2020, includes the use of compactors rather than skips for ship landed waste, category 1 material. This has reduced the requirement for weekly collection and is now on as need basis, normally a collection every 6 to 8 weeks thereby reducing the environmental impact and use of landfill.

In addition, as part of the new contract SFPC have developed an SOP, approved by Department of Agriculture for the management of Category 1 ship landed waste, and now part of the Waste Management Plan.

SFPC with the Department of Agriculture have completed workshops with DOA Officials, port employees and Ships agents on the management of ships waste during 2015.

The WMP was designed primarily to cater for all ship waste has been expanded to encompass all waste generated, as follows:

| Waste Type     | Sub Category | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ships Waste    | General      | Includes packaging, bottles, cartons, wood, paper, and many other items and generally the largest component of waste. Reception facilities for this will be a skip on the shore, accessible to all vessels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                | Swill        | Generally defined as wastes containing material of animal or poultry origin, and food waste. The Department of Agriculture has granted the contractor a licence to remove and dump swill. The Harbour has responsibility to provide through its contractor, adequate reception and storage facilities.<br><br>The removal, conveyance and safe disposal of swill will be subject to control by an authorised officer of the Department of Agriculture, food and forestry (DAFF) (Portal Veterinary Supervisor).                                                                                                                                                                                                                                                                                                                                                                                                            |
|                | Hazardous    | Includes all types of oils, oil contaminated materials (rags etc.), paint containers, other hazardous chemicals used on board.<br><br>Designated wheelie bins are provided for solid hazardous waste – oil tanks for liquid residues.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Port Waste     |              | Includes all non- ship generated waste, and does not include waste generated by companies operating within the port area, who will provide for their own waste disposal.<br><br>Storage is provided for the collection and disposal of Port waste at Limerick and Foynes. In addition an additional 12 cubic yard skip will be supplied at Foynes for the reception of road sweepings. Other installations will provide their own facilities for the disposal of port waste.<br><br>The areas for Port waste collection will be remote from Ship waste compactors and clearly marked. As with ship waste the Port waste will be segregated into general and hazardous waste and disposed of accordingly.<br><br>As with ship waste receipts for the collection and disposal will have to be logged and recorded for inspection. The contractor for ship's waste will also have responsibility for the port waste disposal. |
| Cargo Waste    |              | The ship and the Stevedores/Cargo Receivers are responsible for the collection, storage and proposer disposal of waste accumulated from the load/discharge of cargo.<br><br>It is expected that the Stevedore/Receiver will, as soon as possible after completion of cargo, dispose of any cargo residues remaining on the berth. SFPC will then clean and leave the berth in a clean condition for the next vessel.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Asbestos Waste |              | The potential for asbestos waste arises from the presence of asbestos containing material (ACM) in cladding and sheeting on warehouse and shed structures within the port. The SFPC Waste Management Plan has been updated for 2014 to take account of the presence of ACM in undertaking construction or repair works at SFPC and makes provision for its safe handling, storage and disposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

SFPC maintain detailed records of all wastes removed from site. These records, with the help of Waste Management Contractors include the identification of recycled waste from January 2016, in order to set and achieve targets going forward.

In addition to the Department of Agriculture requirements, SFPC also works to MARPOL requirements. MARPOL is intended to reduce discharge into the oceans. SFPC has recently increased shore reception facilities to include oily rags, empty paint drums and other waste that can be categorised as 'general'.

As mentioned in the previous section around "Water Quality" enclosed units have been placed immediate to the jetties at Foynes and Limerick to allow for the easy collection and disposal of cargo waste, specifically animal feed products. In addition to reducing potential discharge into the water as a result of jetty washing, this also eliminates the necessity to have a dedicated storage area for such waste.

### **Conservation**

The Lower River Shannon is an area of high ecological value and conservation interest and is designated a Special Area of Conservation (SAC) and a Special Protection Area (SPA) for Birds – both Natura 2000 sites.

SFPC operations therefor take place both within and adjacent to sensitive and important habitats and species of mammal and bird.

Through effective control of activities at both Limerick and Foynes, the potential for impact on the flora and fauna of the area is significantly reduced. Developments proposed by SFPC will be subject to Environmental Impact Assessment (EIA) and Appropriate Assessment (AA), which will assess the wider potential for impact on designated Natura 2000 sites.

The Vision 2041 Masterplan has been subjected to Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (HAD) which will ensure that the relevant environmental aspects are taken to more detailed consideration at future planning stages.

### **Oil Pollution Control**

The Company philosophy on this issue has always been to amalgamate all those companies on the Estuary who have a duty to provide a response, into one cohesive unit such that there is adequate equipment and personnel available.

This ensures that the equipment available is extensive in nature instead of every organization having the minimum required which in the event of an incident would be of little or no value.

The entity formed is called "Shannon Estuary anti-Pollution Team" (SEA-PT) and details of it are to be found on the company web site at [www.sfpc.ie](http://www.sfpc.ie).

The members of the team include four local Authorities, Port Company, three oil companies, and three external companies. Each member contributes to maintain the equipment in hand, provide training courses and purchase new equipment.

SFPC provides day-to-day management for this group and organises and hosts regular meetings for Members. In June of 2025 SFPC received approval from the Irish Coast Guard for the Oil/HNS Spill Contingency Plan, with a validity of three (3) years.

SEAPT continues to adopt to both Member requirements and the threat level in the Estuary. The maintenance, training and support element is subject to competition and a new 5-year Contract was issued in March 2025.

SEAPT provides both annual training and an annual exercise for Members. Annual Exercise is typically conducted each April, with a week of annual training being provided in October of every year. SFPC was the lead responding Member for the 2025 exercise, held in Foynes Port in April.

The SEAPT group provides SFPC with a forum to engage with a broad range of Stakeholders. Members include five Local Authorities as well as terminal operators and oil importers. SEAPT members meet at least four times each year. Emerging threats are analysed and there is a continuous assessment of capabilities, to ensure the group can respond to any contingency. The forum also allows for Stakeholders to share best practice, discuss any minor incidents/issues and emerging environmental concerns.

### ***Dredging***

In Ireland there is a very strict licensing regime for dredging which ensures that operations are undertaken in compliance with all the legislative requirements - both National and EU.

The Licensing process has since 2010 fallen under the control of the Environmental Protection Agency (EPA), who are the Statutory Body responsible for issuing consent for dredging operations.

The EPA has granted a 6 year licence (from Dec 2020) to SFPC to undertake maintenance dredging and dispose of dredged material. Maintenance dredging, by ploughing, is also permitted under the EPA Licence S0009.

Conditions of the dredging licence to which SFPC comply include:

- Accommodating a Dolphin Watch (Marine Mammal Observer (MMO))
- Limits on the amount of spoil to be dredged and dumped
- Defining the exact area of the dumpsite
- Defining the time of year at which dredging may take place

A successful Capital dredging programme was completed in June 2018 in Foynes with no adverse findings, complying with all necessary licences and procedures. This included the tendering of the contract, ensuring that the dredging vessel complied with all requirements and records of dredge spoil dumped were recorded and in compliance. Next programme starting Spring 2021.

### ***Compliance***

Within SFPC, the role of [Compliance Officer-Corporate & Regulatory Assurance](#) exists as a focal point for the identification, assessment and evaluation of compliance with all; statutory requirements which affect the Company – including Corporate Governance, Environment, Health & Safety etc.

**Commented [MK8]:** Can you amend as required?

~~This is done using a proprietary on line system Pegasus Legal Register (<http://www.pegasuslegalregister.com/en/>) which identifies environmental and health and safety legislation applicable specifically to SFPC activities.~~

Compliance Evaluation is covered by internal Procedures, which sets out how SFPC identifies, evaluates and measures legal compliance associated with activities and operations within the Company.

~~SFPC utilise a number of external and certified information sources to identify legislation that may be relevant to the organisation. Information can be in the form of legislation, best practice and/or other information useful to assist the company to identify requirements and maintain standards. In addition, SFPC Management can also at any time highlight any additional items which may be relevant to operations / activities of the Company.~~

~~Identification of the relevant legislation is outsourced to Pegasus Legal Register, while the SFPC Compliance Officer is responsible for managing the evaluation process.~~

### **Energy**

~~A detailed energy audit was undertaken by External consultant at Shannon Foynes Port Company, Foynes, Co. Limerick in accordance with the European Energy Efficiency Directive which is transposed into Irish Law by SI 426 of 2014 European Union (Energy Efficiency Regulations) 2014. The site visits were conducted during November and December of 2016. The purpose of this energy audit was to develop energy efficiency opportunities for SFPC to implement and contribute to reaching the overall national energy efficiency targets and to make the organization more energy efficient.~~

Energy management is an all-encompassing process that should include every aspect of an organisation from finance, human resources and public relations to maintenance, purchasing and planning. ~~An Energy Management Diagnostic Questionnaire was completed for the site. The purpose of the questionnaire was to assess the current level of energy management on site according to the 5 pillars of energy management:~~

- ~~1. Commitment: to energy management is vital to its success. When senior management commits to the process then formal plans can be made. Without this support there is a risk that any actions taken will be less effective.~~
  - ~~2. Identify: once you have secured Commitment and the resources necessary to manage energy use, it is essential to develop an understanding of energy use and the factors that drive it. This will help focus attention and resources where the greatest impact can be made.~~
  - ~~3. Plan: After commitment has been secured and an understanding of energy use and its factors has been achieved. Putting energy savings opportunities in place is the next step. It is important to plan how these energy goals and savings opportunities can be put into action.~~
  - ~~4. Take Action: It is important that the key people who effect significant energy consumption in the organisation are aware of the opportunities and motivated to act. This can be achieved through communication, training & energy awareness.~~
  - ~~5. Review: Monitoring and reviewing are vitally important stages in the process. With energy performance indicators in place, information obtained from measuring and monitoring energy use can be used to review and modify the on going energy management system. This helps achieve continual improvement in the management of energy.~~
- ~~Three energy performance indicators were recommended for SFPC. The first recommended energy performance indicator is to monitor and compare electricity consumption in relation to tonnes imported on a weekly or monthly basis. The second is to monitor marked diesel consumption compared with monthly tonnes of product imported through the ports. Thirdly monitor monthly marked diesel consumption on pilot boats relative to tonnes of product imported through the ports.~~

**Commented [MK9]:** Is this ok with you - this is previous report I think??

**Commented [MG10R9]:** I've amended a nice bit here Mick. I've reduced a lot back to generic to reduce the number of changes required in future.

~~Using these indicators the energy performance of the organisation can be compared “benchmarked” with previous performances of the organisation in order to track progress.~~

#### **Energy Management**

~~Energy management is an all-encompassing process that should include every aspect of an organisation from finance, human resources and public relations to maintenance, purchasing and planning. The appointed~~ Energy Performance Officer provides leadership in the application of approved energy policy and any objectives, targets and programs approved by the executive. ~~Additional~~ energy management supports ~~include~~:

Project Coordinator - Energy efficient procurement and project management

Maintenance Team - Maintain operational performance in line with objectives and targets

Compliance Officer - Data management & reporting

External Consultant - Provide advice, guidance and support.

#### **Initiatives Adopted by SFPC to Identify and Achieve Improvement**

##### **Appointed Energy Performance Officer**

The Governance Structure of the Public Sector Energy Efficiency Strategy requires all public sector bodies to designate an Energy Performance Officer (EPO). Ultimately at SFPC the Management Team will be accountable for energy management and performance however the EPO will be in a position to work closely and possibly influence the Management Team with regard to potential energy improvement opportunities. The SFPC EPO will provide advice and leadership regarding energy management in the organisation and act as chair to the climate action committee.

##### **Formation of Climate Action Committee**

~~In 2020 the company formed a~~ The Climate Action Sub Committee to the Management Team ~~which~~ is populated by representatives from compliance, financial control & procurement, port services and engineering ~~and~~ marine operations ~~and business development~~. The Committee is chaired by the Companies Compliance Corporate & Regulatory Assurance Officer. ~~The first objective of this committee was to develop an SFPC climate action plan for approval by Management. P Since its inception the committee has overseen the development of documented information including registers to serve as the foundation to record objectives, improvements, and potential opportunities for the future.~~

##### **Promoting Green Teams & Employee Participation**

~~SFPC continue to encourage engagement, discussion and employee participation. In 2020 the company set in place objectives to highlight the ambitious targets set by the state to improve energy performance and as such requested employees to get involved and assist by developing “Green Teams”. To date a number of employees have signed up and participated in discussion to find opportunities to improve.~~

##### **Climate Action Plan**

~~SFPC have a documented Climate Action Plan which by design details the management systems in place to regulate sustainability and climate resilience within the organisation. The plan includes information on legal and other requirements, stimulating business opportunities, operational efficiency, performance monitoring & measurement and stakeholder engagement. The plan is formally adopted to the Integrated Management System (IMS) approved document list and is subject to audit and inspection as part of the annual audit program.~~

**Commented [MK11]:** As above - does this need to be updated.

~~This Climate Action will serve as the foundation to record and document ongoing improvements and opportunities to improve for the foreseeable future. Actions arising from the Climate Action Plan will be assigned to relevant departments and be tracked by the Climate Action Sub Committee to determine progress.~~

#### ~~2021 Goals.~~

~~Continue to Implement Environment & Energy Policy~~

~~Action recommendations to improve and measure effectiveness~~

~~Utilise funding / financial / grant aids available~~

~~Maintain logical approach to improve energy efficiency while meeting obligations and duties of the organisation.~~

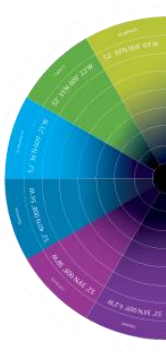
~~Promote energy efficiency and energy projects~~

## 7. SELECTED EXAMPLES OF BEST PRACTICE AND PLANNED ACTIVITIES

SFPC has been at the forefront of Port Environmental Initiatives in Ireland over the past number of years.

The Board and Management of SFPC is committed to the on-going development of a sustainable commercial future on the Shannon Estuary, in a way that recognises and addresses the natural and ecological significance of its environs, the value of which is recognised Nationally and at European level through the Natura 2000 network.

A number of examples of the practical ways in which this commitment is demonstrated are provided in the following pages:



### VISION | 2041

SFPC has undertaken the preparation of a Masterplan in order to promote and support the provision of port infrastructure and services in the Shannon Estuary over the next 30 years. The Masterplan looks specifically at growth and expansion options and consideration of non-core assets at its facilities at Foynes Port and Limerick Docks.

SFPC needs to be able to adapt to the continuous fluctuating business environment that exists and needs to be able to positively respond to potential

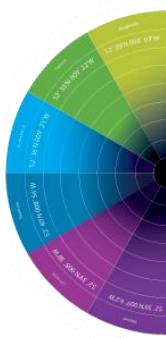
**Commented [MK12]:** I propose slimming this back and instead inserting 2 or 3 examples - not copying previous.

**Commented [MG13R12]:** I agree. I didn't change anything but I did note a number of dates etc that could be stripped out / removed.

investment opportunities in the region. It needs to ensure that the Port of Foynes and Limerick Docks will be ready and able to handle larger trade volumes efficiently and competitively when the opportunities arise and in doing so realise the economic potential of the natural resource that is the Shannon Estuary.

The Masterplan is part of a bigger picture for the Shannon Estuary as SFPC develops its vision for the future and focusses on the positive promotion of the Port as a strategic economic driver for the Mid West Region.

The approved SFPC Masterplan can be found at <http://www.sfpc.ie/about-us/port-development/sfpc-masterplan/>.



### SFPC Waste Management Plan (WMP)

SFPC have prepared a comprehensive and detailed Waste Management Plan (WMP) (<http://www.sfpc.ie/about-us/environment/waste-management/>) which has been approved by the Marine Transport Division of the Irish Department of Transport, Tourism & Sport.

The purpose of the Plan is to ensure:

- Compliance with relevant legislation;
- Company's responsibilities are discharged and transparent;
- Port users are aware of their obligations;
- All vessels using the Estuary are aware of their obligations and the systems in place with regard to waste management;
- Local Authorities, when planning for waste management in their region, allow for the proper reception of port related waste;
- Department of Agriculture requirements in relation to waste management are met;

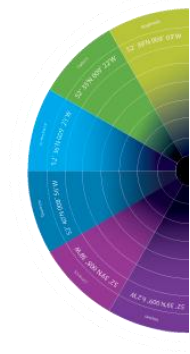
and covers all of the Shannon Estuary under the jurisdiction of SFPC, including the facilities at the following berths; Foynes, Aughinish, Shannon Airport, Limerick, ESB Moneypoint and Endesa Tarbert.

The Plan is a live document which is updated regularly (at least annually) to take account of changing legislation and developments regarding waste.

The Plan was approved in 2017 for 5 years, and will include the changes as a result of a new contract; development of new practices with the Department of Agriculture which now includes the use of compactors at all SFPC sites, and the development of a new SOP for the landing and management of the waste from vessels.

Owing to the way in which the Plan has been developed to manage waste contractors, there is a high level of information available to SFPC on which to analyse and assess the performance of waste management practices at both Foynes and Limerick. The recording of recycled waste has commenced in January 2016 with a view to develop targets in the future.

**Commented [MG14]:** Mick, I propose to remove specific references like this but your call as to best approach.



### **Shannon Estuary Anti-Pollution Team Ltd (SEA - PT)**

SFPC has been instrumental in the formation and operation of an Oil Pollution Consortium known as the Shannon Estuary Anti-Pollution Team Ltd. (SEA-PT) (<http://www.seapt.ie/>).

The team consists of the SFPC, Local Authorities and oil importers and was initiated to form a unified coordinated response to pollution incidents on the Shannon Estuary. Each member contributed initially to provide pollution response equipment and support tools. This equipment is available to respond to any pollution incident or threat. Members contribute annually to maintain equipment, carry out exercises and training and purchase new and replacement equipment.

The group has been in operation for the past 25 years under a committee of pollution officers representing the members. The aim of the group is to provide a unified response to oil pollution within the region, even though each member has individual responsibility for their own area.

Significant investment has been made in the development and updating of an oil Spill Tracking Model, Geographic Information System, Environmental Atlas, Sensitivity Study, Oil Spill Response Strategy, Hydrocarbon Baseline Study and Emergency Response Plans for the region.

A new plan was approved in 2018 valid for 3 years.



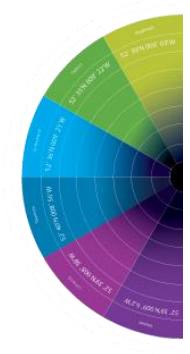
### **Shannon Estuary Oil / HNS (Chemical) Spill Contingency Plan**

SFPC have developed a Contingency Plan to address a major oil/HNS spill (or potential spill) within the Estuary.

The plan, which is approved by the Minister for Transport (Irish Coast Guard Section) under the Sea Pollution (Amendment) Act 1999, is developed to address:

- A major accident occurs involving an oil/HNS spill.
- An uncontrolled event occurs which could be reasonably expected to lead to a major oil/HNS spill.

A major accident under this plan is an occurrence resulting from uncontrolled developments, leading to serious danger to human health or the environment, immediate, or delayed, inside or outside the Shannon Estuary, and involving one or more polluting or dangerous substances.



### **Corporate Social Responsibility (CSR)**

The SFPC Corporate Social Responsibility Policy is a publicly available document, approved by the Board of the Company, which sets out the Company's CSR Policy Objectives (<http://www.sfpc.ie/about-us/corporate-governance/>).

In addition to the implementation of programmes to achieve increasing levels of environmental performance, SFPC is, through its CSR Actions, examining issues around the Physical Quality and Visual /Landscape aspects of the Ports.

It is a key objective of Shannon Foynes Port Company's 30 Year Plan "Vision 2041" and a policy imperative for SFPC that the development and operation of the Ports must benefit the wider community and in particular those living in the town of Foynes and Limerick City. Societal integration of the Port of Foynes and Limerick Docks is seen as an integral part of the corporate social responsibility (CSR) of SFPC.

The best way to communicate with the general public is to activate them and bring them into the Port, either in a guided way or on their own initiative. This implies that the port area should be attractive and accessible for visitors, taking into account security regulations. In line with this initiative, therefore, a general cleaning up of Port activity must be promoted and which is subsequently addressed in Vision 2041. SFPC commits to making the Ports more accessible and to build on its existing public access strategy which facilitates organised tours including schools & university visits.

Solutions devised:

- School visits
- COMPASS Post Primary Transition Year Competition
- Liaising with local Universities with regard to Graduate and Post Graduate studies
- Other institutes such as SOLAS (Formerly FÁS) who provide a range of training options available to Job Seekers to assist their re-entry into the labour market.

Solution Form 3 outlines the work completed on the COMPASS programme which is ongoing in its second competition, with the first competition completed in February 2015.



## Air Quality

SFPC have implemented a programme of dust monitoring at operations in Foynes, and more recently in Limerick, to establish overall levels of dust generations associated with cargo handling operations.

Although not a Statutory requirement, SFPC have implemented monitoring in order to provide real information on the levels of dust which may arise during cargo handling, and to provide a performance measurement against which the dust controls on cargo handling operations can be evaluated.

SFPC have commissioned OES in late 2015 to complete an analysis of all cargoes handled at Foyers and Limerick with regard to their individual characteristics and

effect of the environment and health. This report commenced early 2018 and is now available.



It is a key objective of Shannon Foynes Port Company's 30 Year Plan "Vision 2041" and a policy imperative for SFPC that the development and operation of the Ports must benefit the wider community and in particular those living in the town of Foynes and Limerick City. Societal integration of the Port of Foynes and Limerick Docks is seen as an integral part of the corporate social responsibility (CSR) of SFPC.

It is an objective of SFPC that these functions are facilitated along with the implementation of initiatives which are aimed at securing greater integration of the Ports into communities. The relationship between cities and their ports remains one of interdependency and should be ruled by long-term strategic vision and planning. It is therefore important to both SFPC and to the people of Limerick and Foynes to strengthen their association. This policy objective will underpin both how SFPC operates its current business and any development proposals envisaged under Vision 2041. In this regard it is proposed to undertake a number of initiatives in the short term and over the course of Vision 2041 to achieve integration between the Port of Foynes and Foynes town and between Limerick Docks and Limerick city.

The best way to communicate with the general public is to activate them and bring them into the Port, either in a guided way or on their own initiative. This implies that the port area should be attractive and accessible for visitors, taking into account security regulations. In line with this initiative, therefore, a general cleaning up of Port activity must be promoted and which is subsequently addressed in Vision 2041. SFPC commits to making the Ports more accessible and to build on its existing public access strategy which facilitates organised tours including schools & university visits.

One of the main objectives of this integration is to ensure public accessibility through the hosting of "open days" and organised tours. The Board and Management Team, on this topic, decided to develop further on school tours and include these under COMPASS, Creating our Marine Ports and Schools synergy, with a Post Primary Schools competition, which would include visits to our Ports and in addition, our staff visiting schools to promote the ports message.

## 8. CONTACT INFORMATION

For Further Information, SFPC contact details are as follows:

Shannon Foynes Port Company,  
Harbour Office,  
Foynes,  
Co. Limerick,  
Ireland

T: +353 69 73100

F: +353 69 65142

E: [info@sfpc.ie](mailto:info@sfpc.ie)

W: [sfpc.ie](http://sfpc.ie)

## Register of Environmental Aspects

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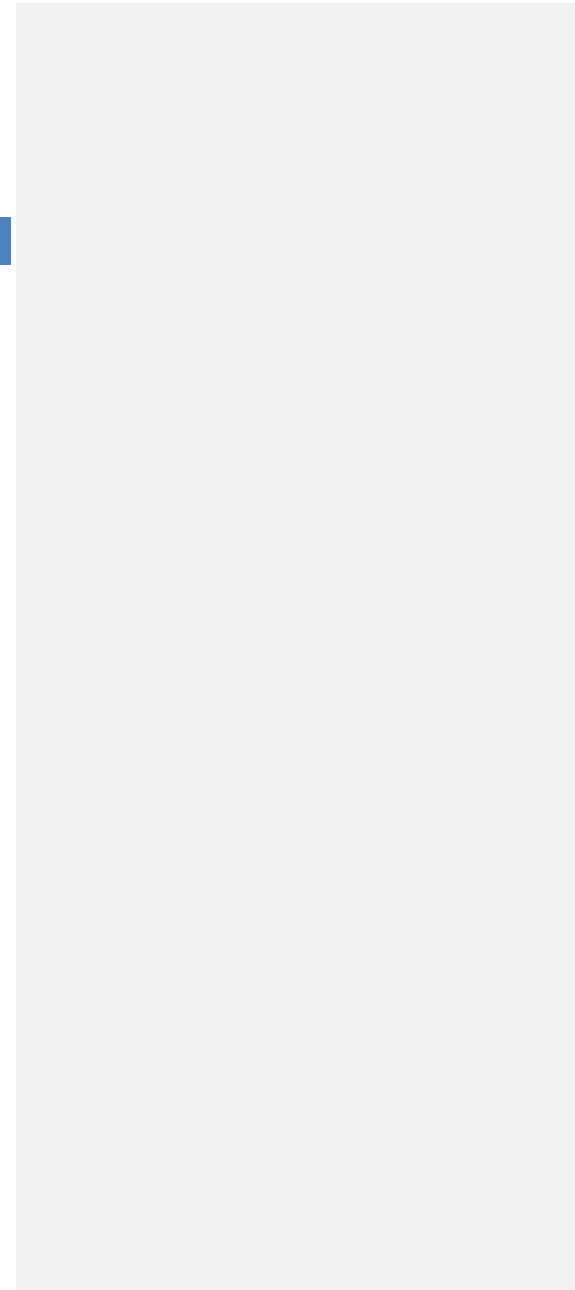
|                                      |                                                    |  |
|--------------------------------------|----------------------------------------------------|--|
| <b>Environmental Aspect Register</b> | <b>Port of:</b> <i>Shannon Foynes Port Company</i> |  |
|--------------------------------------|----------------------------------------------------|--|

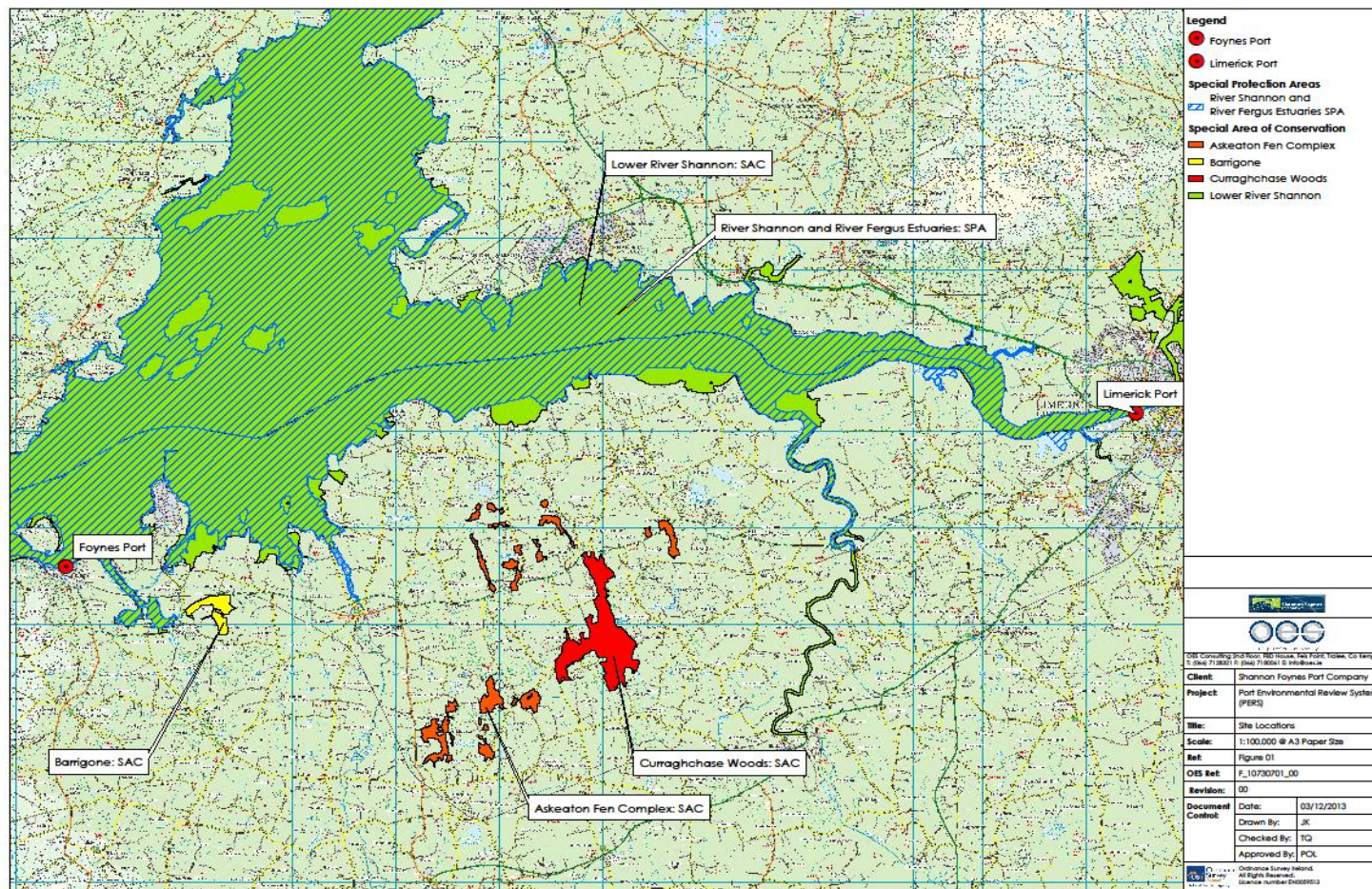
| 1        | 2                                   | 3                 | 4                                 | 5                                                                                                                                                           | 6                                                                                                                                                                 |
|----------|-------------------------------------|-------------------|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ref. Nr. | (sub) department, tenant, operators | Impact on         | Responsible person / organisation | Legal and other requirements                                                                                                                                | Remarks                                                                                                                                                           |
|          | <b>Aspects</b>                      |                   |                                   |                                                                                                                                                             |                                                                                                                                                                   |
|          | <b>Port</b>                         |                   |                                   |                                                                                                                                                             |                                                                                                                                                                   |
|          | Marine Operations                   |                   |                                   |                                                                                                                                                             |                                                                                                                                                                   |
| H1       | Bunkering – Spillage of Fuel        | Water/Soil        | Harbour Master                    | Local Government (Water Pollution) Acts 1977 – 2009<br>Shannon Estuary Marine Emergency Plan 2020<br>SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018 | EHS 014 Emergency Preparedness & Response Procedure<br>ESOP/012 Prevention of pollution from vessels bunkering at anchor or alongside any facility on the estuary |
| H2       | Shipping - Noise                    | Community/Ecology | Harbour Master                    | Environmental Protection Agency Act 1992 (Noise) Regulations 1994                                                                                           | Generally low-level noise, broad band in nature, transient during shipping arrivals/departures                                                                    |
|          | Shipping– Waste Removal             | Water/Soil        | Harbour Master                    | Dumping at Sea (DAS) Acts 1996 to 2012<br>Waste Management Acts 1966 – 2012                                                                                 | EHS 024 Waste Management Plan 2018                                                                                                                                |
|          | Shipping – Ballast water            | Water             | Harbour Master                    | Local Government (Water Pollution) Acts 1977 – 2009                                                                                                         | ESOP/008 Control of discharge of waste water in the estuary                                                                                                       |
|          | Shipping – Hold washings            | Water/Ecology     | Harbour Master                    | Local Government (Water Pollution) Acts 1977 – 2009                                                                                                         | SESOP/004 Control the discharge of ship hold washings into estuary waters                                                                                         |

| 1        | 2                                      | 3                               | 4                                 | 5                                                                                                 | 6                                                                                                                                                           |
|----------|----------------------------------------|---------------------------------|-----------------------------------|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ref. Nr. | (sub) department, tenant, operators    | Impact on                       | Responsible person / organisation | Legal and other requirements                                                                      | Remarks                                                                                                                                                     |
|          | Shipping - Emergencies                 | All Environmental Media         | Harbour Master                    | Local Government (Water Pollution) Acts 1977 – 2009<br>Shannon Estuary Marine Emergency Plan 2020 | ESOP/002 Prevention of pollution from vessels breaking away from any facility on the estuary                                                                |
|          |                                        |                                 |                                   |                                                                                                   |                                                                                                                                                             |
|          | <b>Port Services &amp; Engineering</b> |                                 |                                   |                                                                                                   |                                                                                                                                                             |
| M1       | Dredging – Sediment Disposal           | Water/Ecology                   | Ports Services & Eng. Mgr.        | Dumping at Sea (DAS) Acts 1996 to 2012                                                            | EPA Dumping at Sea Permit Reg. No S0009-02                                                                                                                  |
| M2       | Dredging - Sediment Contaminants       | Water/Ecology                   | Ports Services & Eng. Mgr.        | Dumping at Sea (DAS) Acts 1996 to 2012<br>Habitats Directive/ Birds Directive                     | EPA Dumping at Sea Permit Reg. No S0009-02                                                                                                                  |
| M3       | Port Development/Construction          | Water/Waste/Air /Noise /Ecology | Ports Services & Eng. Mgr.        | SFPC Waste Management Plan 2019<br>SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018         | Noise/Dust Monitoring; MMO during works (dolphin monitoring)<br>ESOP/013 To ensure port development does not impact on eco systems or habitats              |
| M4       | Port Infrastructure - Drainage         | Water/Ecology                   | Ports Services & Eng. Mgr.        | Local Government (Water Pollution) Acts 1977 – 2009<br>Shannon Estuary Marine Emergency Plan 2020 | Drainage system inspected and maintained by SFPC.<br><br>ESOP/008 Control of discharge of waste water in the estuary<br><br>Monitoring plan being developed |
| M5       | Contracted Services                    | All Environmental               | Ports Services & Eng. Mgr.        | Local Government (Water                                                                           | Approved Contractors with                                                                                                                                   |

| 1        | 2                                   | 3                 | 4                                          | 5                                                                                                                                                           | 6                                                                                                                     |
|----------|-------------------------------------|-------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Ref. Nr. | (sub) department, tenant, operators | Impact on         | Responsible person / organisation          | Legal and other requirements                                                                                                                                | Remarks                                                                                                               |
|          |                                     | Media             |                                            | Pollution) Acts 1977 – 2009<br>Waste Management Act 1996<br><br>SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018                                      | prior approval to access the port areas<br>Speed limit applied on site<br>List of approved chemicals for use in port. |
|          | <b>Environmental Department</b>     |                   |                                            |                                                                                                                                                             |                                                                                                                       |
| E1       | Port Operations - Noise             | Community/Ecology | Ports Services & Eng. Mgr./ Harbour Master | Environmental Protection Agency Act 1992 (Noise) Regulations 1994                                                                                           | EHS 038 Noise Monitoring & Control<br>ESOP/019 Prevention of noise pollution arising from cargo operations            |
| E2       | Port Operations – Spillages         | Water/Air         | Ports Services & Eng. Mgr./ Harbour Master | Local Government (Water Pollution) Acts 1977 – 2009<br>Shannon Estuary Marine Emergency Plan 2016<br>SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018 | ESOP/009 Control of cargo spillages onto jetties during cargo operations                                              |
| E3       | Port Operations – Fugitive Dust     | Air/Land/Water    | Ports Services & Eng. Mgr./ Harbour Master | Air Pollution Act 1996                                                                                                                                      | ESOP/001 Control of Dust Emissions from bulk cargo operations<br>Monitoring                                           |
| E4       | Port Operations – Water Supply      | All Personnel     | Ports Services & Eng. Mgr.                 | EC (Quality of Water Intended for Human Consumption) Regulations, 1988                                                                                      | Monitoring                                                                                                            |
|          | <b>Tenants and Organisations</b>    |                   |                                            |                                                                                                                                                             |                                                                                                                       |

| 1        | 2                                               | 3                                                 | 4                                 | 5                                                                                                                                                | 6                                                                                                      |
|----------|-------------------------------------------------|---------------------------------------------------|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Ref. Nr. | (sub) department, tenant, operators             | Impact on                                         | Responsible person / organisation | Legal and other requirements                                                                                                                     | Remarks                                                                                                |
| T1       | Trade Activities - Discharges of Trade Effluent | Water/Soil                                        | Tenant Companies                  | Local Government (Water Pollution) Acts 1977 – 2009<br>S4 Discharge Licences from Local Authority                                                | Tenants responsible for compliance with Local Authority Licences                                       |
| T2       | Trade Activities - Waste                        | Water/Soil                                        | Tenant Companies                  | Waste Management Act 1996<br>EPA Waste Licence<br>Local Authority Waste Permit                                                                   | Tenants responsible for compliance with Local Authority /EPA Licences                                  |
| T3       | Trade Activities - Noise                        | Community/Ecology                                 | Tenant Companies                  | Planning & Development Act 2001<br>Environmental Protection Agency Act 1992<br>(Noise) Regulations 1994                                          | Tenants responsible for noise levels. Complaints re-directed to Tenant if received by SFPC.            |
|          | Trade Activities - Dust                         | Air/Land/Water                                    | Tenant Companies                  | Air Pollution Act 1996                                                                                                                           | ESOP/014 To control dust emissions from trucks loading ex stores / warehouses<br>Monitoring            |
| T4       | Trade Activities - Spillages                    | Water/Soil/Air                                    | Tenant Companies                  | Local Government (Water Pollution) Acts 1977 – 2009<br>Planning & Development Act 2001<br>SFPC Oil / HNS (Chemical) Spill Contingency Plan, 2018 | EHS 014 Emergency Preparedness & Response Procedure<br>ESOP/010 Control of cargo spillages from trucks |
| T4       | Trade Activities - Emergencies                  | Water/Soil/Air                                    | Tenant Companies                  | SEVESO II Directive                                                                                                                              | Notification to HAS                                                                                    |
| T5       | Local Community                                 | Community, Development, business and environment. | Port Services, Senior Management  | Business continuity                                                                                                                              | Interaction with local community, addressing complaints and information flow.                          |





## SFPC H&amp;S Policy

|                        |                          |                                   |             |
|------------------------|--------------------------|-----------------------------------|-------------|
| <b>SFPC EHS SOP</b>    |                          | <b>Health &amp; Safety Policy</b> |             |
| Doc No: EHS/001        |                          | Rev No.: 09                       | Page 1 of 1 |
| Issue Date: 28.05.2024 | Written by: M. Geoghegan | Approved by: P Keating            |             |

**Shannon Foynes Port Company – Health & Safety Policy**

Shannon Foynes Port Company (SFPC) is the Port Authority with Statutory responsibility for commercial maritime activities within the limits defined in the Harbours Acts and amendments 1996-2015.

It is the policy of this company to implement and maintain, in so far as is reasonably practicable, systems and procedures to prevent maritime activities and actions that pose a threat or have a negative impact on human health & safety or damage to the natural environment.

All employees have the responsibility to cooperate with Management, Supervision and principle staff members to achieve the satisfactory implementation of this policy.

SFPC is committed to:

- Developing and implementing an integrated Management System which incorporates H&S management that is appropriate to the nature, scale and impacts of our activities or services and in accordance with ISO 45001:2018
- Comply with our statutory, non-statutory and best practice obligations as outlined by legislation, shareholder and industry best practice in so far as is reasonably practicable.
- Promote participation & consultation with employees, tenants and contractors on H&S matters and encourage involvement in H&S management programs, promoting a positive H&S culture within the scope of SFPC responsibilities.
- Evaluate and regularly review, H&S risks associated with the company's activities, documenting programs to eliminate or reduce, in so far as is reasonably practicable, any risks identified.
- Promote continual improvement of the H&S management system through performance measurement setting and reviewing objectives and targets approved as part of H&S management programs.
- Develop awareness amongst staff and employees of their responsibility for their own safety and that of their colleagues.
- Facilitate elected H&S representatives in all matters regarding H&S at SFPC.
- Ensure this H&S Policy is reviewed annually and/or if the business changes in nature or size.

Employees are hereby notified of the company policy and encouraged to comply with their statutory duties and to notify company management of identified H&S hazards the workplace.

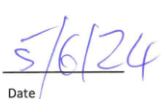
Copies of this Policy are made available at company locations and available to interested parties upon request.

The allocation of duties for H&S matters and particular arrangements to implement this policy are set out in the SFPC Integrated Management System Manual.

Responsibility for implementation and communication of the H&S Policy and associated documentation lies with the Chief Executive Officer, the Port Services Manager (H&S Manager), the Board of Directors and Management team general, who will ensure the objectives of this policy are achieved.



Pat Keating  
Chief Executive Officer



Date

SFPC CSR  
Policy

Approved by: Board  
Date: 05<sup>th</sup> Oct 2012

**Corporate Social Responsibility Policy Statement**

Shannon Foynes Port Company, Ireland's second largest port operation, has statutory jurisdiction over all marine activities on a 500km<sup>2</sup> area on the Shannon Estuary, stretching from Kerry/Loop Heads to Limerick City. The strategic location of our terminals offers access to the vibrant economy and population of a large part of Ireland.

Our key activities centre on the provision of a safe haven for shipping in the Shannon Estuary by traffic management within the port limits; the maintenance and development of terminal and shore-side facilities; and the operation of cargo handling and logistic services.

Our corporate social objectives aim to apply good business behaviour over and above legal requirements where reasonably practicable, to areas such as health & safety, environmental impact, customer service, working conditions and the community.

SFPC is committed to the development of modern and efficient systems and recognises good Corporate Social Responsibility to be of equal importance to other prime business considerations.

**SFPC key CSR Management Areas:***Health & Safety:*

- Significant investment in health and safety management, administration and training
- Use of the OHSAS 18001 management system to drive best practice and meet legal obligations.
- Maintain safe and secure port entry within all facilities
- Annually review safety performance with an objective to continually improve.

*Environment:*

- Commitment to environmentally responsible actions in energy efficiency, conservation, risk management, emergency planning, and responsible waste management
- Encourage wide consultation, dialogue and cooperation between port users and stakeholders to facilitate sustainable economic development.
- Embracing new technologies and management systems to assess and minimise the company's 'carbon footprint'
- Implementation of effective management systems (PERS) as a key component of business to drive continual improvement in environmental performance

*Community:*

- Embracing co-habitation and dialogue with national, regional & local authorities and local communities
- Conserve good relations with those effected by our activities and operations
- Promote public awareness through local media, company website and familiarisation programmes such as open days & school visits
- Improve support and interaction with local residential and business communities.
- Improve the image of our ports within the communities of Foynes & Limerick, different ranges of external stakeholders, wider communities and general public
- Facilitate public access to our archived records in a controlled environment.

*Marketplace:*

- Maintain the highest ethical standards in accordance with the code of practice for governance of state bodies.
- Use the externally validated ISO 9001:2008 management system to provide and measure appropriate 'duty of care' and service in respect of stakeholders, customers and suppliers
- Enhancing the international reputation of the Shannon Region as a unique natural environment available for sustainable development.
- Develop strategic plans to promote and support the provision of port infrastructure and services in the Shannon Estuary into the future
- Promote our Ports as key economic drivers within the region
- Monitor and evaluate customer satisfaction and promote continual improvement

*Workplace:*

- Providing best practice labour standards and employee welfare
- Support Human Resources to ensure all aspects contribute to business success
- Promote equal opportunity and progress equality and diversity throughout the company.
- Support training and development programmes to provide core skills requirements, personal development and continuous professional development to facilitate business success
- Provide proper management, custody, care and conservation of records and archives.

**Responsibility:**

The Responsibility for the overall direction of the CSR Policy lies with Board and the Chief Executive. The Chief Executive and Management Team ensure that the Policy is understood, implemented and maintained at all levels of the organisation.

SFPC will provide resources in terms of people, materials and equipment to ensure the delivery of this policy.

Signed: \_\_\_\_\_  
*Pat Keating*  
*Chief Executive Officer*

Date: \_\_\_\_\_