

**FITZGERALD-BASSEY CONSULTANCY LIMITED**

**ENVIRONMENT, HEALTH AND SAFETY MANUAL**

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**EXECUTIVE SUMMARY**

This Environment Health and Safety Management System Manual is the principal EHS management document of Fitzgerald - Bassey Consultancy Limited (FBassey). It sets out the primary elements of the company's EHS Management System and defines accountabilities at the various levels of Management. It provides an essential reference for the company's staff in the planning and implementation of operations and ensures that necessary processes are in place to allow the EHS objectives of the company to be met. This manual enables anyone involved in the activities of the company to obtain a clear understanding of the mechanisms that have been put in place to ensure continuous improvement in EHS performance. It enables shareholders and other interested parties to understand how EHS is managed as an integral part of the business. The EHS Management System Manual is reviewed annually and updated accordingly.

# 1. INTRODUCTION

## 1.1 The EHS Management System

The EHS Management Systems of Fitzgerald - Bassey Consultancy Limited (FBassey) is built on the Model: PLAN, DO, CHECK and ACT and satisfies the ISO 14001:2004 standards.

PLAN: establish the objectives and processes necessary to deliver results in accordance with FBassey environmental policy.

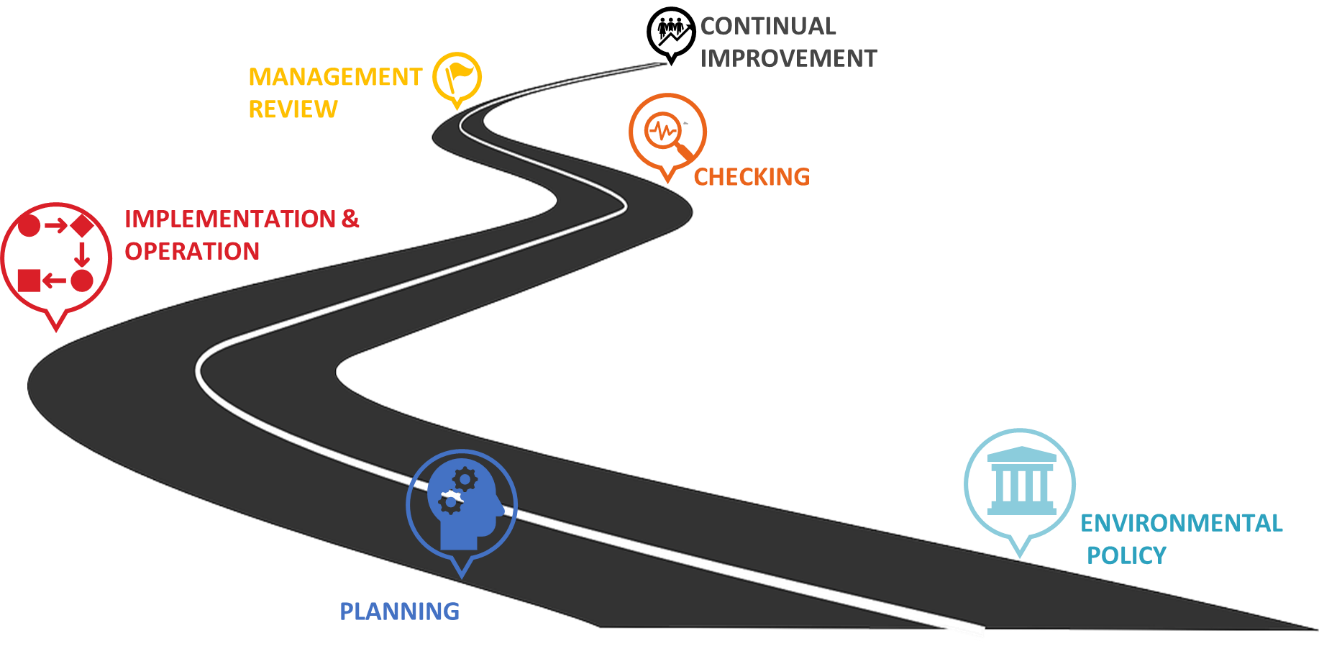
DO: implement the processes.

CHECK: monitor and measure FBassey processes against environmental policy, objectives, targets, legal and other requirements, and report the results.

ACT: take actions to continually improve performance of the EHS Management System.

## 1.2 Application

The EHS Management System of FBassey applies to all the company's facilities and activities, including subsidiaries and/or joint ventures.

Figure 1 Fitzgerald-Bassey Consultancy Limited EHS Management System Model

## 1.3 EHS Management System Manual

This EHS Management System Manual is the principal EHS Management document of Fitzgerald - Bassey Consultancy Limited. It sets out the primary elements of the EHS Management System and defines accountabilities at the various levels of Management. It provides an essential reference for the company's staff in the planning and implementation of operations and ensures that necessary processes are in place to allow the EHS objectives of the company to be met. This manual enables anyone involved in the activities of the company to obtain a clear understanding of the mechanisms that have been put in place to ensure continuous improvement in EHS performance. It enables shareholders and other interested parties to understand how EHS is managed as an integral part of the business. The EHS Management System Manual is a controlled document issued in accordance with the company's document control procedure. All hard copies are clearly identified, and an accurate record of all holders is maintained by the EHS Management System Custodian. The EHS Management System will be reviewed annually and the EHS Management System Manual updated accordingly. In addition, a review of the manual may be triggered by an incident which reveals shortcomings in the EHS Management System. Deficiencies revealed by audits or reviews may also trigger a revision of the manual.

### 1.3.1 EHS Management System Owner

The Senior Managing Partner is the Owner of the EHS Management System. Ultimate responsibility for the implementation of the EHS Management System and the approval of the EHS Management System Manual's contents are vested in the EHS Management System Owner.

### 1. 3.2 EHS Management System Holder

The EHS Advisor is the Holder of the EHS Management System on behalf of the Management Team of Fitzgerald-Bassey Energy Resources Limited. The Holder is responsible

* For the administration of the EHS Management System
* To keep the gates at Management Review Team (MRT) Meetings
* To report to the management team progress against the EHS Management System and needs for improvement
* To ensure that FBassey is in compliance with all legislation and policy requirements
* Ensure appropriate controls are in place to manage all identified EHS hazards effectively
* Review proposals for changes to the Manual
* Participate as the principal auditor in audits and reviews of the EHS Management System

### 1.3.3 EHS Management System Custodian

The EHS officer is the Custodian of the EHS Management System. The EHS officer is responsible for preparing the EHS Management System Manual for review by the EHS Management system Holder. He is also responsible for ensuring that revisions and updates are prepared when necessary. The Custodian ensures that the distribution of the manual is controlled and maintains a list of persons/positions who receive the manual and subsequent updates.

# 2. EHS POLICY

Fitzgerald-Bassey Consultancy Limited and its affiliates are committed to achieving excellence in Environment, Health and Safety (EHS). It is the responsibility and commitment of both top management and employees to operate safe, clean and efficient fuel storage, distribution and all related activities in an environmentally and socially responsible manner.

## 2.1 POLICY OBJECTIVES

* Provide all employees, contractors and visitors to our facilities with a safe and healthful workplace.
* Communicate the EHS concerns regarding our operations and products to our employees, contractors and the public.
* Provide our distributors and customers with the information necessary to handle and manage our products safely.
* Comply with applicable EHS legal and other requirements to which the organization subscribes and recognizes this, as the minimum standard for operations performance.
* Strive for continuous improvement through the implementation of responsible and well recognized standards in order to prevent pollution of the Environment and injury to people.
* Ensure that all managers, employees and contractors are aware of this policy and have been trained on their specific responsibilities for EHS
* Set EHS objectives and targets for improvement and continually review to achieve EHS process excellence.
* Maintain open communication with the public with regard to our policy and its implementation.

# 3. ENVIRONMENTAL ASPECTS/IMPACTS AND OH&S HAZARDS/RISK

## 3.1 Environmental Aspect/Hazard Identification

Fitzgerald - Bassey Consultancy Limited has identified the environmental aspects of its activities, products and services so that it can control and influence taking into account planned or new developments or new or modified activities

The effects of activities on operations, processes are considered by the multi compulsory consensus team comprising of the EHS Advisor and other employees. The evaluation technique allows an analysis of the activities operating under normal, abnormal, start up and shut down conditions as appropriate.

The ranking of significant rating is agreed by the consensus team, taking into accounts, legal implications, impacts severity and the frequency of aspect occurrence.

The EHS Advisor will regularly review the evaluation of aspects/hazards.

The EHS Advisor will maintain a register of significant environmental impacts and intolerable OH&S risks (Aspect and HIRA Registers) and regularly reviews the registers for the inclusion/exclusion of any impacts/risks from processes and activities that are new or obsolete

## 3.2 Legal and other Requirement

The EHS Manager maintains a register of regulatory and other policy requirements. The register of legislative, regulatory and other policy requirements is detailed in the Legal register.

This is regularly reviewed and updated by the EHS Manager to its validity. When necessary the Management Review Team (MRT) shall seek additional information on new legislation and further interpretation by contacting relevant third parties; Industrial associations or groups, or other FBassey affiliates

## 3.3 Objectives and Targets.

Fitzgerald-Bassey Consultancy Limited seeks to set objective and targets which will serve as points of assessment of performance of its Management system.

In order to effectively prioritize areas to be managed, FBassey has in place an aspect/HIRA register which analyses all applicable aspects/hazards associated with its operations to identify those considered significant based on impact to the environment and ability to control.

Refer to the risk Management Plan.

# 4. IMPLEMENTATION AND OPERATIONS

## 4.1 Structure and Responsibility

### 4.1.1 Responsibility and Authority

The EHS responsibilities of the staff of FBassey are described below.

4.1.1. a. Chief Executive Officer

The Chief Executive Officer is the Owner of the EHS Management system and is responsible for ensuring that EHS is managed properly in Fitzgerald-Bassey . He/She is responsible for establishing policies on EHS, developing the organisation and providing the resources required to implement the policies. He/She is the chairman of the EHS Management Committee.

4.1.1. b. Line Managers and Supervisors

Each line manager is responsible for the EHS performance of their area of jurisdiction. They are responsible for ensuring the provision of resources for the implementation of EHS policies, standards, procedures and controls that constitute elements of the EHS Management system, for the health and safety of all employees, contractors, visitors, customers and others who may be affected by the conduct of our business and for ensuring that due regard is given to the protection of the environment in all activities. Specific responsibilities include:

* Involvement, where required, in the preparation of EHS Cases
* Establishing the organization and controls to ensure that all activities are conducted in accordance with the EHS Management systems.
* Promoting and maintaining a high level of EHS awareness and commitment amongst all staff in their department
* Ensuring that decisions involving EHS issues and the management of hazards are given equal importance to any other critical business activity
* Providing adequate resources to meet EHS policy requirements and objectives
* Formulating and adopting safe and environmentally sound working systems, procedures and practices which meet Woodfield’s standards and comply with local statutory requirements
* Maintaining the technical integrity of the physical assets
* Ensuring that EHS responsibilities of all employees and contractors under their control are clearly defined
* Developing EHS objectives for the department which arise from the corporate objectives
* Monitoring the performance of the department against EHS objectives and the performance of line managers with respect to departmental targets
* Establishing individual tasks and targets for EHS and monitoring the performance of each employee and contractor against these targets through the staff appraisal and contractor review processes
* preparation of and / or input to annual EHS Plans

The responsibilities of line managers cascade down to supervisors. They play a key role by providing the communication link between senior management and employees. Their other responsibilities include:

* Promoting a high level of EHS awareness among the employees
* Encouraging and forwarding feedback from employees to senior management through meetings
* Participating in site audits and reviews
* Ensuring and promoting the implementation of the EHS management system at their area of operation

4.1.1. c. Company Employees and Contractor Employees

All company and contractor employees are responsible for co-operating fully in the implementation of all EHS policies and plans. They are required to actively participate in the development and maintenance of EHS Cases involving the facility or operation appropriate to them. They participate in unsafe act auditing, near-miss reporting and potential incident (PI) reporting.

4.1.1. d. EHS Manager

The EHS Manager is responsible for providing advice and support to the Management Team, Department Heads and line managers to assist them in the discharge of their EHS responsibilities as set out in this manual. The EHS Manager is the custodian of the EHS Management System.

Specific responsibilities include:

* Developing and assisting in the implementation and maintenance of corporate policies and guidelines on EHS
* Assisting in formulating corporate short-term and long-term EHS objectives and plans
* Drawing up, obtaining approval and coordinating the implementation of EHS plans
* Monitoring, evaluating and reporting performance against corporate EHS plans and targets
* Providing proposals for initiatives to sustain commitment to EHS and assisting line management in efforts to maintain momentum in awareness promotion
* Obtaining and providing specialist technical support and advice on any of the elements of the EHS Management System whenever needed
* Maintaining EHS auditing expertise and ensuring execution of an annual EHS audit program
* Maintaining contacts with external parties regarding EHS, including government authorities, legislative bodies and industry groups

### 4.1.2 Competence, training and Awareness

Fitzgerald - Bassey Consultancy Limited has established procedures for identifying training needs of all employees. Line Managers are responsible for identifying individual training needs. The competence profiling exercise forms the basis of the identification of individual EHS training needs Training may be provided through formal courses and/or through structured development in the workplace. Individual training records are kept for each employee.

The training will include the importance of complying with the company's EHS policy, objectives and implementation of the EHS Management program.

## 4.2. Communications

The formal line of communication on EHS matters within Fitzgerald-Bassey, both downwards and upwards, will be via the EHS committee structure. The interlocking structure of EHS committees ensures that information is passed down from senior management to employees, and that feedback and input from employees is communicated up to management in an efficient manner. In addition, newsletters, notices on notice boards, videos, competitions, posters, etc., are fully exploited to assist in raising awareness and maintaining a high profile for EHS.

The EHS Management Committee, chaired by the Senior Managing Partner includes all Departmental Heads. It meets two times per year, or more if required, for the specific purpose of reviewing:

* Corporate EHS policies, strategic objectives and the EHS Management System
* Performance against targets, and making changes where necessary
* Progress on the implementation of action plans from audits, incident and Potential Incident investigations

The second level consists of Terminal management and Heads of other relevant departments. They assess the fitness of the facility and the implementation of operational procedures and processes for the issuance of assurance to management.

The third level consists of Site EHS Committees for Tema and Takoradi sites. The committees involve Departmental Heads and other line managers (direct reports) responsible for the relevant activities. Each committee meets on a quarterly basis to discuss operational strategies and performance against targets.

The fourth level-involves all stakeholders on site (staff, security, transporters and all other contractors working on site. They meet daily. The respective departmental head and the EHS Manager are expected to attend at least once a quarter.

The meetings of all the above committees have formal agenda. Minutes of all meetings are produced, including agreed action items which identify responsible parties and target completion dates.

Tool-box meetings are brief, informal meetings organised by line managers or supervisors. They involve all staffs who are engaged in specific operations and they aim to:

* Raise awareness of EHS issues of particular relevance to the staff
* Give feedback on key EHS issues from the previous week
* Get across specific EHS messages relevant to non-standard tasks planned for the week ahead
* Obtain feedback on EHS matters from employees and contractors

## 4.3 Documentation and Document Control

The EHS and associated EHS cases will be thoroughly documented. They will be reviewed and audited by either internal or external parties if required.

All policies and procedures to be used under the EHS Management System shall be issued by a member of top management or an approved deputy and approved for adequacy for usage by either the Senior Managing Partner or the Manager of the Environmental Health and safety Department prior to acceptance and usage.

The applicable documents shall bear the following information:

1. Name/ title of the document
2. Unique number/ ID of the document
3. Date of issue
4. Issuing and approval authorities
5. Version number
6. Reason for issue/ reissue
7. Distribution list

Company standards and documents are issued in accordance with the company's document control procedure.

## 4.4 Operational Control

Fitzgerald - Bassey Consultancy Limited operates a system which details the responsibilities for the operational control by use of procedures and works instructions and job descriptions. All procedures and Works Instructions are subject to approval by Line Managers and Supervisor prior to issue and to ensure that all personnel understand the operational control, reviews and approval mechanisms.

Environmental and OH&S monitoring will be carried out in accordance with approved company instructions whether they are in the form of procedure or works instructions etc.

Acceptance criteria for each significant EHS parameter are detailed on Work Instructions and the appropriate actions to be taken if these parameters are not complied with.

Emergency Procedures are prepared where necessary to address accidents, which would significantly and adversely affect FBassey Environmental Impact and OH&S risks and cause contravention of legislative requirements. Procedures are in place that ensures the identification of significant environmental aspect and OH&S hazards of goods and services used by FBassey and communicating the applicable procedures and requirements to suppliers, including contractors.

# 5. CHECKING AND CORRECTIVE ACTIONS

## 5.1 Monitoring and Measurement

FBassey has established and maintains documented procedures for monitoring and measuring, on regular basis, key Environmental Indicators of its significant environmental impacts and OH&S risks.

The monitoring includes water consumption, electricity usage, number of complaints and etc. Effluent measurements are also monitored. These include the pH values, BOD, COD etc. Ambient noise and air quality is also monitored within the company boundaries.

These measurements are taken according to regulation requirements. The results are analysed and used to determine the areas of success and to identify activities requiring corrective actions and improvement. The Senior Managing Partner and line managers are informed of the results.

The instruments shall be calibrated according to manufacturers’ instructions. The EHS Manager maintains a record of these results.

## 5.2 Evaluation of Compliance

FBassey has established a procedure for the process for evaluating compliance of the Environmental aspects and OH&S risks identified in the EHS Management System of FBassey to legal and other requirements.

The Terminal Manager shall assess the level of compliance of EHS and take reasonable action(s) recommended by the EHS Manager to fulfil or achieve compliance within a specified time frame.

Evaluation of compliance will be conducted on regular basis or when it becomes necessary or based on previous compliance or a specific legal requirement.

## 5.3 Accident/Incident Investigation

All accidents and incidents, including Potential Incidents, involving staff, contractors, customers or third parties arising from the business activities of Fitzgerald-Bassey are thoroughly investigated. The process for accident and incident investigation in Fitzgerald-Bassey is in accordance with accident investigation record keeping and reporting. These guidelines provide guidance on immediate action, reporting, recording and investigation of incidents.

Every incident will be investigated and a detailed investigation report compiled. The level of investigation will depend on the severity of the potential consequences of the incident.

The purpose of the incident investigation report is:

* To identify the immediate and root causes of the incident
* To identify the corrective actions necessary to prevent recurrence of similar incidents
* To permit the structured communication of findings and recommendations to all appropriate staff and contractors and, where appropriate, communication within the Fitzgerald-Bassey Group in order to share learning points.

The EHS Manager is responsible for ensuring that corrective actions are implemented and for reporting on their implementation each quarter to the company's EHS Management Committee.

## 5.4 Non-Conformance, corrective and Preventive Action

Fitzgerald - Bassey Consultancy Limited has established a procedure for non-conformance and complaints.

Complaints reports from external parties are referred first to the EHS Manager who decides on what line of action to be taken. Cases of non-conformance are always referred to the EHS Manager who initiates the required action. Internal non-conformance reports first goes to the EHS Manager/EHS Officer who then takes the appropriate action.

The procedures for Monitoring and Corrective Actions is EMS Procedures 2.9

## 5.5 EHS Management Records

Fitzgerald - Bassey Consultancy Limited has established and maintains procedures for the identification, maintenance and disposition of EHS records.

i) EHS Management System Manual

The EHS Manager is responsible for the necessary regulatory registration and keeps records of the EHS Management System, its objectives and its programmes. The records are stored according to a predetermined period

ii) Key Performance Indicator

The EHS Manager keeps records of water consumption, electricity usage, incidents, effluent monitoring and other measurements from significant impacts and OH&S risks.

Other Records

Records regarding calibration are kept by the responsible department. Training records of personnel are kept permanently in the training file by EHS department.

The EHS Manager keeps records regarding internal and external EHS audits.

## 5.6 EHS Management System Audit

Fitzgerald - Bassey Consultancy Limited has established and maintains an Internal Environmental Audit Procedures to satisfy the requirements of the ISO 14001:2004

The Audit plan will ensure that the EHS Management System activities conform to the requirements of the EHS Management Programme; FBassey systems are effective and properly implemented and maintained.

# 6. MANAGEMENT REVIEW

The top Management of Fitzgerald-Bassey monitors company EHS performance through regular feedback on performance against plans and targets, audit findings, accident / incident investigation reports and recommendations et alia.

Additionally, the top Management will, at least once per year, review the corporate EHS Management system and its performance. The review process will check on:

* How well the system has been implemented
* How well the system is being maintained
* How effective the system is
* Whether targets are being satisfactorily achieved and the desired results being obtained
* The continued suitability of the system in the light of any changes to the business, legislation or external factors.

The Senior Managing Partner will chair the meeting.

Approved………………………….

**Kwabena Peprah**

**(Managing Partner)**