



Environmental Impact Measurement Framework

Doc No: EPOL 020 **Title:** Environmental Impact

Issue Date: 14/01/2026 **Issue:** 1

Author: Jim Higgins

Authorised: Robert Fenton

Company: East Lancashire Chemical Company Ltd

Linked Policy: Environmental Policy (EPOL 006, Issue 2, 10/10/2025)

Effective From: 2026

Approved By: Group Managing Director

1. Purpose

This document sets out how East Lancashire Chemical Company Ltd (ELCC) will **identify, measure, monitor, and review its environmental impacts** going forward. It translates the principles of the Company Environmental Policy into practical, auditable processes and performance indicators, ensuring compliance with UK environmental legislation and continual improvement of environmental performance.

2. Scope

This framework applies to all ELCC operations, including:

- Manufacturing processes
- Utilities and energy use (water, gas, electricity)
- Industrial boiler operation
- Waste generation, handling, recycling, and disposal
- Emissions to air, land, and water
- Purchased utilities and services
- Contractors and suppliers where relevant

3. Legislative and Regulatory Framework (UK)

ELCC will measure and manage environmental impacts in compliance with all applicable UK legislation, including but not limited to:



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3.1 Core Environmental Legislation

- Environmental Protection Act 1990
- Environment Act 2021
- Pollution Prevention and Control Act 1999
- Climate Change Act 2008 (as amended)

3.2 Waste and Recycling

- Waste (England and Wales) Regulations 2011
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- Duty of Care Regulations

3.3 Water and Effluent

- Water Resources Act 1991
- Environmental Permitting Regulations 2016
- Trade Effluent Regulations (local water authority requirements)

3.4 Air Emissions and Energy

- Clean Air Act 1993
- Industrial Emissions Directive (as retained in UK law)
- Medium Combustion Plant Directive (MCPD) requirements
- Energy Savings Opportunity Scheme (ESOS) Regulations
- Streamlined Energy and Carbon Reporting (SECR)

3.5 Chemicals and Substances

- UK REACH Regulations
- Control of Substances Hazardous to Health Regulations (COSHH)

ELCC will maintain a **legal register** which is reviewed at least annually to ensure ongoing compliance.



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4. Environmental Aspects and Impact Identification

ELCC will maintain an **Environmental Aspects and Impacts Register**, identifying:

- Normal operations
- Abnormal operations
- Emergency situations

Each aspect will be assessed for significance based on:

- Legal requirements
- Severity of environmental impact
- Likelihood of occurrence
- Stakeholder and regulatory concern

5. Measurement and Monitoring by Environmental Sector

5.1 Water Usage and Supply

Impacts Considered:

- Consumption of mains water
- Trade effluent and surface water discharge
- Risk of contamination or leaks

Measurement Methods:

- Metered water usage (monthly and annual reporting)
- Water intensity metrics (m³ per tonne of product)
- Monitoring of effluent volumes and consent limits
- Incident and spill reporting



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Performance Indicators:

- Total water consumption (m³)
- Water consumption per unit of production
- Number of water-related incidents or permit breaches

5.2 Gas Usage and Supply

Impacts Considered:

- Fossil fuel consumption
- Greenhouse gas emissions (Scope 1)

Measurement Methods:

- Gas meter readings
- Conversion to CO₂e using UK Government emission factors
- Monitoring against production volumes

Performance Indicators:

- Total gas consumption (kWh)
- CO₂e emissions from gas use
- Energy intensity (kWh per tonne of output)

5.3 Electricity Usage and Supply

Impacts Considered:

- Indirect greenhouse gas emissions (Scope 2)
- Grid dependency and energy efficiency

Measurement Methods:

- Electricity meter readings
- Supplier invoices and half-hourly data (where available)



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- CO₂e conversion using UK grid factors

Performance Indicators:

- Total electricity consumption (kWh)
- Electricity intensity per unit of production
- Scope 2 CO₂e emissions

5.4 Industrial Boiler Operations

Impacts Considered:

- Combustion emissions (NO_x, CO, CO₂)
- Fuel efficiency
- Compliance with MCPD and permit conditions

Measurement Methods:

- Fuel usage records
- Boiler efficiency checks and servicing records
- Emissions testing and statutory inspections

Performance Indicators:

- Fuel consumption per operating hour
- CO₂e emissions from boiler operations
- Number of non-compliances or breakdowns

5.5 Waste Generation and Recycling

Impacts Considered:

- Hazardous and non-hazardous waste
- Disposal methods (landfill, recovery, recycling)
- Duty of Care compliance



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Measurement Methods:

- Waste transfer notes and consignment notes
- Contractor reports and weights
- Waste audits

Performance Indicators:

- Total waste generated (tonnes)
- Recycling and recovery rate (%)
- Hazardous waste generated per tonne of production

6. Data Management and Reporting

- All environmental data will be recorded, retained, and controlled in line with company procedures.
- Environmental performance will be reviewed at least annually by senior management.
- Data will support statutory reporting requirements including SECR and ESOS where applicable.

7. Targets and Continuous Improvement

ELCC will:

- Set measurable environmental objectives and targets
- Prioritise energy efficiency, waste reduction, and emissions reduction
- Consider best available techniques (BAT) when upgrading processes

Progress against targets will be tracked and reviewed through internal audits and management review.



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8. Auditing and Review

- Internal environmental audits will be conducted periodically to verify compliance and performance.
- Findings will be documented and corrective actions tracked to completion.
- This framework will be reviewed at least annually or following significant operational or legislative change.

9. Roles and Responsibilities

- **Group Managing Director:** Overall accountability for environmental performance
- **Management Team:** Implementation of this framework and achievement of objectives
- **Employees:** Compliance with procedures and reporting of environmental concerns
- **Contractors:** Compliance with ELCC environmental requirements

10. Commitment

East Lancashire Chemical Company Ltd is committed to measuring, managing, and reducing its environmental impacts in line with legal requirements, best practice, and the principles set out in its Environmental Policy.

Robert Fenton
Group Managing Director
14th January 2026