



Headquarters,
Johnstown Castle Estate,
County Wexford, Ireland

GREENHOUSE GAS EMISSIONS PERMIT

Permit Register Number: IE-GHG048-10367-6

Operator: Pelagia Feed (Ireland) Limited
Donegal Road
Killybegs
Donegal
F94 V8CT

Installation Name: Pelagia Killybegs

Site Name: Pelagia Killybegs

Location: Donegal Road
Killybegs
Donegal
F94 V8CT
Ireland

Introductory Note

This introductory note does not form a part of the Greenhouse Gas Emissions Permit.

This Greenhouse Gas Emissions Permit authorises the holder to undertake named activities resulting in emissions of Carbon Dioxide from the listed emission sources. It also contains requirements that must be met in respect of such emissions, including monitoring and reporting requirements. This Greenhouse Gas Emissions Permit places an obligation on the Operator to surrender allowances to the Agency equal to the annual reportable emissions of carbon dioxide equivalent from the installation in each calendar year, no later than four months after the end of each such year.

Contact with Agency:

If you contact the Agency about this Greenhouse Gas Emissions Permit please quote the following reference: Greenhouse Gas Emissions Permit N^o IE-GHG048-10367.

All correspondence in relation to this permit should be addressed to:

Email: help.ets@epa.ie

By Post: Climate Change Unit, Environmental Protection Agency
P.O. Box 3000, Johnstown Castle Estate,
Co. Wexford

Updating of the permit:

This Greenhouse Gas Emissions Permit may be updated by the Agency, subject to compliance with Condition 2. The current Greenhouse Gas Emissions Permit will normally be available on the Agency's website at www.epa.ie and [ETSWAP](#).

Surrender of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially surrendered, a written application must be made to the on-line ETS portal, and written permission received from, the Agency through [ETSWAP](#).

Transfer of the permit or part of the permit:

Before this Greenhouse Gas Emissions Permit can be wholly or partially transferred to another Operator a joint written application to transfer this Greenhouse Gas Emissions Permit must be made (by both the existing and proposed Operators) to, and written permission received from, the Agency through the on-line ETS portal [ETSWAP](#).

Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. (as of the date of this permit):

IPC/IE Licence Register Number
P0416-4

Status Log

Current Permit

Permit number	Date application received	Date Permit issued	Comment
IE-GHG048-10367-6	26 March 2021	25 June 2021	<p>The decommissioned steam generator S6, its associated emission point A1-4 and its fuel source LPG-002 (Bulk) have been removed from the permit.</p> <p>Also, the serial numbers of the two fuel meters associated with D-001 (Gas/Diesel Oil for Heating) have been removed from the permit and the emission points map has been updated.</p>

Previous Permits

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG048-10367-1	GHG Permit Application	17 December 2013	10 January 2014	
IE-GHG048-10367-2	GHG Variation	25 February 2014	05 June 2014	Change to the Activity Data Tiers for Gas/Diesel Oil and Liquefied Petroleum Gases.
IE-GHG048-10367-3	GHG Variation	23 December 2014	27 January 2015	<ol style="list-style-type: none"> 1. Addition of previously omitted emission sources (Acetylene, portable generators). 2. Update of minor meters details (gas oil).

Permit number	Change Type	Date application received	Date Permit issued	Comment
IE-GHG048-10367-4	GHG Variation	18 January 2016	02 February 2016	<p>1. Replacement of emission source (S3) in May 2015 from an 8.5 MW Low Temperature heater to a 19.60 MW boiler.</p> <p>2. IE Licence Register Number updated.</p>
IE-GHG048-10367-5	GHG Variation	09 March 2017	22 January 2018	<p>Emission source MFO added on 13th March 2017.</p> <p>Operator name changed to Pelagia Feed (Ireland) Limited on 31 October 2017 .</p> <p>Installation name changed to Pelagia Killybegs on 12/12/2017.</p> <p>Holding Company details updated to Pelagia AS.</p> <p>Source Streams Gas/Diesel oil used for central heating (D-001 and D-002) amalgamated to D-001.</p>

End of Introductory Note

Glossary of Terms

For the purposes of this permit the terms listed in the left hand column shall have the meaning given in the right hand column below:

The Agency	Environmental Protection Agency.
Agreement	Agreement in writing.
Allowance	Permission to emit to the atmosphere one tonne of carbon dioxide equivalent during a specified period issued for the purposes of Directive 2003/87/EC by the Agency or by a designated national competent authority of a Member State of the European Union.
Annual Reportable Emissions	Reportable Emissions of carbon dioxide made in any calendar year commencing from 1 January 2005 or the year of commencement of the activity, whichever is the later.
A & V Regulation	Commission Regulation (EU) No 600/2012 of 21 June 2012 on the verification of greenhouse gas emission reports and tonne-kilometre reports and the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Category A Installation	As defined in Article 19.2 (a) of the M&R Regulation.
Category B Installation	As defined in Article 19.2 (b) of the M&R Regulation.
Category C Installation	As defined in Article 19.2 (c) of the M&R Regulation.
The Directive	Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.
Emissions	The release of greenhouse gases into the atmosphere from sources in an installation.
EPA	Environmental Protection Agency.
Fall-Back Methodology	As defined in Article 22 of the M&R Regulation.
GHG	Greenhouse gas.
GHG Permit	Greenhouse gas emissions permit.
Greenhouse Gas	Any of the gases in Schedule 2 of the Regulations.
IPC/IE	Integrated Pollution Control/Industrial Emissions.
Installation	Any stationary technical unit where one or more activities listed in Schedule 1 to the Regulations are carried out. Also any other directly associated activities which have a technical connection with the activities carried out on that site and which could have an effect on emissions and pollution. References to an installation include references to part of an installation.

Installation with low emissions	As defined in Article 47 of the M&R Regulation.
Major Source Streams	As defined in Article 19.3 (c) of the M&R Regulation.
M&R Regulation	Commission Regulation (EU) No 601/2012 of 21 June 2012 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and any amendments or revisions thereto.
Mis-statement	An omission, misrepresentation or error in the Operators reported data, not considering the uncertainty permissible pursuant to Article 12(1)(a) of Regulation (EU) no 601/2012.
N/A	Not applicable.
Monitoring Plan	The Plan submitted and approved in accordance with Condition 3.1 of this permit and attached at Appendix 1.
Non-conformity	Any act or omission by the Operator, either intentional or unintentional, that is contrary to the greenhouse gas emissions permit and the requirements of the Monitoring Plan.
The National Administrator	The person so designated in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC.
The Operator (for the purposes of this permit)	Pelagia Feed (Ireland) Limited
“operator”	Any person who operates or controls an installation or to whom decisive economic power over the functioning of the installation has been delegated.
Person	Any natural or legal person.
Reportable emissions	The total releases to the atmosphere of carbon dioxide (expressed in tonnes of carbon dioxide equivalent) from the emission sources specified in Table 2 and arising from the Schedule 1 activities which are specified in Table 1.
The Regulations	European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 (S.I. No 490 of 2012) and any amendments or revisions thereto.
The Verifier	A legal person or another legal entity carrying out verification activities pursuant to Regulation (EU) No 600/2012 and accredited by a national accreditation body pursuant to Regulation (EC) No 765/2008 and Regulation (EU) No 600/2012 or a natural person otherwise authorised, without prejudice to Article 5(2) of Regulation (EC) No 765/2008, at the time a verification report is issued.
The Registry	The Registry as provided for under Article 19 of Directive 2003/87/EC.

Schedule 1

Schedule 1 to the Regulations.



Reasons for the Decision

The Agency is satisfied, on the basis of the information available, that subject to compliance with the conditions of this permit, the Operator is capable of monitoring and reporting emissions in accordance with the requirements of the Regulations.

Activities Permitted

Pursuant to the Regulations the Agency issues this Greenhouse Gas Emissions Permit, subject to any subsequent revisions, corrections or modifications it deems appropriate, to:

The Operator:

Pelagia Feed (Ireland) Limited
Donegal Road
Killybegs
Donegal
F94 V8CT

Company Registration Number: 8639

to carry out the following

Categories of activity:

Annex 1 Activity
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

at the following installation(s):

Pelagia Killybegs **Installation number:** 38

located at

Donegal Road
Killybegs
Donegal
F94 V8CT
Ireland

subject to the five conditions contained herein, with the reasons therefor and associated tables attached thereto.

Conditions

Condition 1. The Permitted Installation

- 1.1 This permit is being granted in substitution for the previous GHG permit granted to the Operator as listed in the Status Log of this GHG permit.
- 1.2 The Operator is authorised to undertake the activities and/or the directly associated activities specified in Table 1 below resulting in the emission of carbon dioxide:

Table 1 - Activities which are listed in Schedule 1 of the Regulations and other directly associated activities carried out on the site:

Installation No.: 38

Activity Description
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
Directly Associated Activity Description
(WWTP) Wastewater Treatment Plant

- 1.3 Carbon dioxide from Schedule 1 activities shall be emitted to atmosphere only from the emission sources as listed in Table 2 below:

Table 2 Emission Sources and Capacities:

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S2	No. 2 Boiler	11.2	MW
S1	No. 1 Boiler	11.2	MW
S3	No. 3 Boiler	19.6	MW
S4	Office Central Heating Boiler	0.24	MW
S5	Garage Central Heating Boiler	0.06	MW
S7	Acetylene for Workshop Use	0.01	MW
S8	Small Generator (Yanmar) - S16F - 180/A	0.01	MW

Emission Source Reference	Emission Source Description	Capacity	Capacity Units
S9	Large Generator - FG Wilson P110-2	0.09	MW

- 1.4 The activity shall be controlled, operated and maintained so that emissions of carbon dioxide shall take place only as set out in this GHG Emissions Permit. The permit does not control emissions of gases other than carbon dioxide. All agreed plans, programmes and methodologies required to be carried out under the terms of this permit, become part of this permit.
- 1.5 This GHG Permit is for the purposes of GHG emissions permitting under the European Communities (Greenhouse Gas Emissions Trading) Regulations 2012 and any amendments to the same only and nothing in this permit shall be construed as negating the Operator’s statutory obligations or requirements under any other enactments or regulations unless specifically amended by the Regulations.
- 1.6 Any reference in this permit to ‘installation’ shall mean the installation as described in the Greenhouse Gas Emissions Permit application and any amendments approved by the Agency.

Reason: To describe the installation and clarify the scope of this permit.

Condition 2. Notification

- 2.1 No alteration to, or reconstruction in respect of, the activity or any part thereof which would, or is likely to, result in a change in:
 - 2.1.1 the nature or functioning of the installation;
 - 2.1.2 the capacity of the installation as detailed in this permit;
 - 2.1.3 the fuels used at the installation;
 - 2.1.4 the range of activities to be carried out at the installation
 that may require updating of the GHG permit shall be carried out or commenced without prior notice to and without the prior written agreement of the Agency.
- 2.2 The Operator shall notify the Agency in writing of the cessation of all or part of any activity listed in Table 1 of this permit no later than one month from the date of cessation or by 31 December of the year of cessation, whichever is sooner.
- 2.3 The Operator shall apply for an update of this GHG Permit where there is a change to the Operator name and/or registered address of the Operator, within seven days of the change.
- 2.4 For installations or parts of installations which have not come into operation when the application for this permit was made the Operator shall notify the Agency of the date of commencement of the activity within seven days of commencement.
- 2.5 The Operator shall notify the Agency in writing within three days of becoming aware of any factors which may prevent compliance with the conditions of this permit.
- 2.6 The Operator shall submit to the Agency by 21 January of each year a declaration of operability. The declaration submitted shall be in the format required by the Agency.
- 2.7 All notifications required under Condition 2 above shall be made to the address given in the Explanatory Note included with this permit.

- 2.8 The Operator shall submit to the Agency by 31 December of each year all relevant information about any planned or effective changes to the capacity, activity level and operation of an installation. The information submitted shall be in the format required by the Agency.

Reason: To provide for the notification of updated information on the activity.

Condition 3. Monitoring and Reporting

- 3.1 The Operator shall monitor and record greenhouse gas emissions on site in accordance with the M&R Regulation and the approved Monitoring Plan attached at Appendix 1 to this GHG permit and in compliance with any other guidance approved by the Agency for the purposes of implementing the Directive and/or the Regulations.
- 3.2 The Operator shall modify the monitoring plan in any of the following situations:
- 3.2.1 new emissions occur due to new activities carried out or due to the use of new fuels or materials not yet contained in the monitoring plan;
 - 3.2.2 the change of availability of data, due to the use of new measurement instrument types, sampling methods or analysis methods, or for other reasons, leads to higher accuracy in the determination of emissions;
 - 3.2.3 data resulting from the previously applied monitoring methodology has been found incorrect;
 - 3.2.4 changing the monitoring plan improves the accuracy of the reported data, unless this is technically not feasible or incurs unreasonable costs;
 - 3.2.5 the monitoring plan is not in conformity with the requirements of the M&R Regulation and the Agency requests a change;
 - 3.2.6 it is necessary to respond to the suggestions for improvement of the monitoring plan contained in the verification report.

The Operator shall notify any proposals for modification of the monitoring plan to the Agency without undue delay. Any significant modifications of the monitoring plan, as defined in Article 15 of the M&R Regulation, shall be subject to approval by the Agency. Where approved these changes shall be implemented within a timeframe agreed by the Agency.

- 3.3 Temporary changes to the monitoring methodology:
- 3.3.1 Where it is for technical reasons temporarily not feasible to apply the tier in the monitoring plan for the activity data or each calculation factor of a fuel or material stream as approved by the Agency, the Operator shall apply the highest achievable tier until the conditions for application of the tier approved in the monitoring plan have been restored. The Operator shall take all necessary measures to allow the prompt restoration of the tier in the approved monitoring plan. The Operator shall notify the temporary change to the monitoring methodology without undue delay to the Agency specifying:
- (i) The reasons for the deviation from the tier;
 - (ii) in detail, the interim monitoring methodology applied by the Operator to determine the emissions until the conditions for the application of the tier in the monitoring plan have been restored;
 - (iii) the measures the Operator is taking to restore the conditions for the application of the tier in the approved monitoring plan;

- (iv) the anticipated point in time when application of the approved tier will be resumed.
- 3.3.2 A record of all non-compliances with the approved monitoring plan shall be maintained on-site and shall be available on-site for inspection by authorised persons of the Agency and/or by the Verifier at all reasonable times.
- 3.4 The Operator shall appoint a Verifier to ensure that, before their submission, the reports required by Condition 3.5 below are verified in accordance with the criteria set out in Schedule 5 of the Regulations, the A&V Regulation and any more detailed requirements of the Agency.
- 3.5 The written report of the verified annual reportable emissions and the verification report in respect of each calendar year shall be submitted to the Agency by the Operator no later than 31 March of the following year. The reports shall be in the format required by the Agency and meet the criteria set out in the M&R and A&V Regulations.
- 3.6 The Operator shall enter the verified annual reportable emissions figure for the preceding year into the Registry no later than 31 March of the following year. This figure shall be electronically approved by the Verifier in the registry no later than 31 March of each year.
- 3.7 Where an Operator is applying the Fall-Back methodology, the Operator shall assess and quantify each year the uncertainties of all parameters used for the determination of the annual emissions in accordance with the ISO Guide to the Expression of Uncertainty in Measurement or another equivalent internationally accepted standard and include the verified results in the written report of the verified annual reportable emissions to be submitted to the Agency by 31 March each year.
- 3.8 An Operator shall submit to the Agency for approval a report containing the information detailed in (i) or (ii) below, where appropriate, by the following deadlines:
- (a) for a category A installation, by 30 June every four years;
 - (b) for a category B installation, by 30 June every two years;
 - (c) for a category C installation, by 30 June every year.
- (i) Where the Operator does not apply at least the tiers required pursuant to the first subparagraph of Article 26(1) and to Article 41(1) of the M&R Regulation, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply the required tiers. Where evidence is found that measures needed for reaching those tiers have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan and submit proposals for implementing appropriate measures and its timing.
- (ii) Where the Operator applies a fall-back monitoring methodology, the Operator shall provide a justification as to why it is technically not feasible or would incur unreasonable costs to apply at least tier 1 for one or more major or minor source streams. Where evidence is found that measures needed for reaching at least tier 1 for those source streams have become technically feasible and do not incur unreasonable costs, the Operator shall notify the Agency of appropriate modifications to the monitoring plan, submit proposals and a timeframe for implementing appropriate measures.
- 3.9 Where the verification report states outstanding non conformities, misstatements or recommendations for improvements the Operator shall submit a report to the Agency for approval by 30 June of the year in which the verification report is issued. This requirement does not apply to the Operator of an installation with low emissions where the verification report contains recommendations for improvements only. The report shall describe how and when the Operator has rectified or plans to rectify the non-conformities identified and to implement recommended improvements. Where recommended improvements would not lead to an improvement of the monitoring methodology this must be justified by the Operator. Where the recommended

improvements would incur unreasonable costs the Operator shall provide evidence of the unreasonable nature of the costs. The Operator shall implement the improvements specified by the Agency in response to the report submitted in accordance with this Condition in accordance with a timeframe set by the Agency.

- 3.10 The Operator shall make available to the Verifier and to the Agency any information and data relating to emissions of carbon dioxide which are required in order to verify the reports referred to in Condition 3.5 above or as required by the Agency to facilitate it in establishing benchmarks and/or best practice guidance.
- 3.11 Provision shall also be made for the transfer of environmental information, in relation to this permit, to the Agency's computer system, as may be requested by the Agency.
- 3.12 The Operator shall retain all information as specified in the M&R Regulation for a period of at least 10 years after the submission of the relevant annual report.
- 3.13 A record of independent confirmation of capacities listed in this permit shall be available on-site for inspection by authorised persons of the Agency at all reasonable times.
- 3.14 The Operator shall keep records of all modifications of the monitoring plan. The records shall include the information specified in Article 16.3 of the M&R Regulation.
- 3.15 The Operator shall ensure that members of the public can view a copy of this permit and any reports submitted to the Agency in accordance with this permit at all reasonable times. This requirement shall be integrated with the requirements of any public information programme approved by the Agency in relation to any other permit or licence held by the Operator for the site.

Reason: To provide for monitoring and reporting in accordance with the Regulations.

Condition 4. Allowances

4.1 Surrender of Allowances

- 4.1.1 The Operator shall, by 30 April in each year, surrender to the Agency, or other appropriate body specified by the Agency, allowances equal to the annual reportable emissions in the preceding calendar year.
- 4.1.2 The number of allowances to be surrendered shall be the annual reportable emissions for the preceding calendar year plus such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due. This includes allowances to cover the amount of any annual reportable emissions in respect of which allowances were not surrendered in accordance with Condition 4.1.1 in the previous year, and the amount of any reportable emissions which were discovered during the previous year to have been unreported in reports submitted under Condition 3 in that or in earlier years.
- 4.1.3 In relation to activities or parts of activities which have ceased to take place and have been notified to the Agency in accordance with Condition 2.2 above, the Operator shall surrender to the Agency allowances equal to the annual reportable emissions from such activities in the preceding calendar year or part thereof, together with such allowances as may be necessary to cover any earlier calendar year in respect of which allowances remain outstanding and due as described in Condition 4.1.2 above.
- 4.1.4 The Operator may, from 2008 onwards, subject to the provisions of the Regulations and the relevant National Allocation Plan for that compliance year, surrender emission reduction units (ERUs) and certified emission reduction units (CERs) in place of allowances.

- 4.2 The holding, transfer, surrender and cancellation of allowances shall be in accordance with the requirements of any Regulations adopted as provided for under Article 19.3 of Directive 2003/87/EC, any amendment or revision to the same and any guidance issued by the Agency or the National Administrator.
- 4.3 The Operator shall provide the National Administrator with all the necessary information for the opening of an Operator holding account for the installation described in Condition 1 of this permit within twenty working days of the issue of this permit, unless such an account is already open.

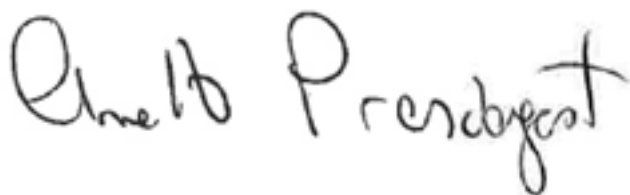
Reason: To provide for the surrendering, holding, transfer and cancellation of allowances in respect of reported emissions.

Condition 5. Penalties

5.1 Any Operator who fails to comply with Condition 4.1 above shall be subject to the provisions of the Regulations, including, but not limited to the payment of penalties.

Reason: To provide for the payment of excess emissions penalties as required under the Regulations.

Signed by the Authorised Person on this the 25 June 2021:



Ms. Annette Prendergast
Inspector/ Authorised Person

Appendix 1 to Greenhouse Gas Emissions Permit Number IE-GHG048-10367

Monitoring Plan

1. Guidelines & Conditions

1. Directive 2003/87/EC as amended by Directive 2009/29/EC (hereinafter "the (revised) EU ETS Directive") requires operators of installations which are included in the European Greenhouse Gas Emission Trading Scheme (the EU ETS) to hold a valid GHG emission permit issued by the relevant Competent Authority and to monitor and report their emissions and have the reports verified by an independent and accredited verifier.

The Directive can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2003L0087:20090625:EN:PDF>

2. The Monitoring and Reporting Regulation (Commission Regulation (EU) No 601/2012) (hereinafter the "MRR") defines further requirements for monitoring and reporting.

The MRR can be downloaded from:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:181:0030:0104:EN:PDF>

Article 12 of the MRR sets out specific requirements for the content and submission of the monitoring plan and its updates. Article 12 outlines the importance of the Monitoring plan as follows:

The monitoring plan shall consist of a detailed complete and transparent documentation of the monitoring methodology of a specific installation [or aircraft operator] and shall contain at least the elements laid down in Annex I.

Furthermore Article 74(1) states:

Member States may require the operator and aircraft operator to use electronic templates or specific file formats for submission of monitoring plans and changes to the monitoring plan as well as for submission of annual emissions reports tonne-kilometre data reports verification reports and improvement reports. Those templates or file format specifications established by the Member States shall at least contain the information contained in electronic templates or file format specifications published by the Commission

3. All Commission guidance documents on the Monitoring and Reporting Regulation will be published at the link below as they become available:

http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

(a) Information sources:

EU Websites:

EU-Legislation: <http://eur-lex.europa.eu/en/index.htm>

EU ETS general: http://ec.europa.eu/clima/policies/ets/index_en.htm

Monitoring and Reporting in the EU ETS: http://ec.europa.eu/clima/policies/ets/monitoring/index_en.htm

Environmental Protection Agency Website:

<http://www.epa.ie>

Environmental Protection Agency Contact:

GHGpermit@epa.ie

2. Application Details

The Installation Name, Site Name and the address of the site of the installation are detailed below. The Site Name and address can be updated from the Organisation Details Page on the ETSWAP website. The Installation Name can only be updated by your Competent Authority.

Installation name Pelagia Killybegs

Site name Pelagia Killybegs

Address Donegal Road
Killybegs
Donegal
F94 V8CT
Ireland

Grid reference of site main entrance E172192, N377527

Licence held pursuant to the Environmental Protection Agency Act 1992, as amended. Yes

IPC/IE Licence Register Number	Licence holder	Competent body
P0416-4	United Fish Industries	Environmental Protection Agency

Has the regulated activity commenced at the Installation? Yes

Date of Regulated Activity commencement 01 January 2008

This information is only required to identify the first relevant reporting year of an installation. If the installation was in operation from the beginning of 2008 and held a Greenhouse Gas Emissions Permit from this point, 1 January 2008 will be used where the actual date of commencement is not readily known.

3. About the Operator

The information about the "Operator" is listed below. The "Operator" is defined as the person who it is proposed will have control over the relevant Regulated Activities in the installation in respect of which this application is being made.

(b) Operator Details

The name of the operator and where applicable the company registration number are detailed below. These details can only be updated by the Environmental Protection Agency.

Operator name Pelagia Feed (Ireland) Limited

Company Registration Number 8639

Operator Legal status

The legal status of the operator is: Company / Corporate Body

(c) Company / Corporate Body

Is the trading / business name different to the operator name? No

Registered office address

Address Line 1	Donegal Road
Address Line 2	N/A
City/Town	Killybegs
County	Donegal
Postcode	F94 V8CT

Principal office address

Is the principal office address different to the registered office address? No

Holding company

Does the company belong to a holding company? Yes

Holding company name Pelagia AS

Holding company address

Address Line 1	Bradbenken 1
Address Line 2	N/A
City/Town	Bergen 5003
County	N/A
Postcode	Norway
Company registration number	989 094 823

Is the holding company principal address different to the holding company address? No

(d) Operator Authority

Does the operator named above have the authority and ability to:

- a. manage site operations through having day-to-day control of plant operation including the manner and rate of operation Yes
- b. ensure that permit conditions are effectively complied with Yes
- c. control monitor and report specified emissions Yes
- d. be responsible for trading in Allowances so that at the end of a reporting period allowances can be balanced against reported emissions. Yes

4. Service Contact

e. Service Contact

Address	Donegal Road Killybegs County Donegal F94 V8CT Ireland
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5. Installation Activities

f. Installation Description

Below is a description of the installation and its activities, a brief outline description of the site and the installation and the location of the installation on the site. The description also includes a non-technical summary of the activities carried out at the installation briefly describing each activity performed and the technical units used within each activity.

The plant takes in fish and fish trimmings to produce fish meal and fish oil. There are two boilers with thermal input of 11.2 2 MW each, and more recently another boiler rated at 19.60 MW to give a total of 42.41 MW.

2. The liquid portion of the fish is refined in to make fish oil.

Steam is supplied from the site boiler house through a header pipe and lines, (which is not metered), to the cookers and to the Driers.

The steam is generated by burning either HFO, MFO or tallow in either of the two 11.2MW boilers or by burning HFO/MFO in the new 19.60 MW boiler.

Tallow maybe used as a bio-liquid fuel and only sources meeting the criteria set out in Article 17(1) of the RES-D will be used and the proper certification sought.

Consequently, as the sustainability criteria will be applied for biofuels and bio-liquids that are consumed by Pelagia Killybegs a zero-rated emission factor for greenhouse gas emissions will be used.

g. Annex 1 Activities

The table below lists the technical details for each Annex 1 activity carried out at the installation.

Note that 'capacity' in this context means:

- Rated thermal input (for combustion installations) which is defined as the rate at which fuel can be burned at the maximum continuous rating of the installation multiplied by the calorific value of the fuel and expressed as megawatts thermal.
- Production capacity for those specified Annex I activities for which production capacity determines ETS eligibility.

Annex 1 Activity	Total Capacity	Capacity units	Specified Emissions
Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)	42.41	MW	Carbon Dioxide

h. Site Diagram

The table below lists attachments (if available) that provide a simple diagram showing emissions sources source streams sampling points and metering/measurement equipment.

Attachment	Description
GHG Map 2021.pdf	GHG Map for Pelagia Killybegs, updated 2021

i. Estimated Annual Emissions

Detail of the estimated annual emission of CO₂ equivalent. This information enables categorisation of the installation in accordance with Article 19 of the MRR and is based on the average verified annual emissions of the previous trading period data OR if this data is not available or is inappropriate a conservative estimate of annual average emissions including transferred CO₂ excluding CO₂ from biomass.

Estimated Annual Emissions (tonnes CO _{2(e)})	16000
Justification for the use of a conservative estimate of CO ₂ emissions.	Based on projected tonnes of raw material (i.e. fish) expected at the factory.

Installation Category: A

6. Emissions Details

j. About your emissions

Annex I of the Monitoring and Reporting Regulations (MRR) requires that monitoring plans include a description of "the installation" and activities to be carried out and monitored including a list of emission sources and source streams. The information provided in this template relates to the Annex I activity(ies) comprised in the installation in question and should relate to a single installation. It includes any activities carried out by the operator and does not include related activities carried out by other operators.

k. Emission Sources

The table below lists all the emission sources at the installation, which may include directly associated activities/excluded activities.

Emission Source Reference	Emission Source Description
S2	No. 2 Boiler
S1	No. 1 Boiler
S3	No. 3 Boiler
S4	Office Central Heating Boiler
S5	Garage Central Heating Boiler
WWTP	Wastewater Treatment Plant
S7	Acetylene for Workshop Use
S8	Small Generator (Yanmar) - S16F - 180/A
S9	Large Generator - FG Wilson P110-2

The table below lists the emission sources which are linked to the Regulated Activities at the installation.

Emission Source Reference	Emission Source Description
S2	No. 2 Boiler
S1	No. 1 Boiler
S3	No. 3 Boiler
S4	Office Central Heating Boiler
S5	Garage Central Heating Boiler
S7	Acetylene for Workshop Use
S8	Small Generator (Yanmar) - S16F - 180/A
S9	Large Generator - FG Wilson P110-2

I. Emission Points

The table below lists all the emission points at the installation, which may include directly associated activities/excluded activities.

Emission Point Reference	Emission Point Description
A1-2	No.2 Boiler Stack
A1-1	No.1 Boiler Stack
A1-3	No. 3 Boiler Stack
B3	Office Central Heating Boiler Stack
B4	Garage Central Heating Boiler Stack
WWTP-1	Wastewater Treatment Plant Tanks
A1-5	Workshop
EMG-01	Small Generator (Yanmar) Exhaust
EMG-02	Large Generator (FG Wilson) Exhaust

m. Source Streams (fuels and/or materials)

The table below lists the source streams which are used in Schedule 1 Activities at the installation.

Source Stream Reference	Source Stream Type	Source Stream Description
HFO-001	Combustion: Other gaseous & liquid fuels	Fuel Oil
TAL-001	Combustion: Other gaseous & liquid fuels	Other Liquid Biofuels
LPG-001 (Bottled)	Combustion: Other gaseous & liquid fuels	Liquefied Petroleum Gases
D-001 (Gas/Diesel Oil for heating)	Combustion: Commercial standard fuels	Gas/Diesel Oil
ACET-1	Combustion: Other gaseous & liquid fuels	Acetylene
D-003 (Gas/Diesel Oil for Generators)	Combustion: Commercial standard fuels	Gas/Diesel Oil
MFO-001	Combustion: Other gaseous & liquid fuels	Fuel Oil

n. Emissions Summary

The table below provides a summary of the emission source and source stream details in the installation.

Source streams (Fuel / Material)	Emission Source Refs.	Emission Point Refs.	Annex 1 Activity
HFO-001	S1,S2,S3	A1-1,A1-2,A1-3	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
TAL-001	S1,S2	A1-1,A1-2	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
LPG-001 (Bottled)	S1,S2,S3	A1-1,A1-2,A1-3	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
D-001 (Gas/Diesel Oil for heating)	S4,S5	B3,B4	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
ACET-1	S7	A1-5	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
D-003 (Gas/Diesel Oil for Generators)	S8,S9	EMG-01,EMG-02	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)
MFO-001	S1,S2,S3	A1-1,A1-2,A1-3	Combustion of fuels in installations with a total rated thermal input exceeding 20 MW (except in installations for the incineration of hazardous or municipal waste)

o. Excluded Activities

Certain activities that result in greenhouse gas emissions may be excluded under the EU ETS Directive for example truly mobile sources such as vehicle emissions.

Do you have any excluded activities which need to be identified in your monitoring plan? Yes

Detail of these activities:

Source Stream Refs	Emission Source Ref	Emission Point Ref
n/a	WWTP	WWTP-1

7. Low Emissions Eligibility

p. Low Emissions Eligibility

The operator may submit a simplified monitoring plan for an installation where no nitrous oxide activities are carried out and it can be demonstrated that:

(a) the average verified annual emissions of the installation during the previous trading period was less than 25 000 tonnes CO_{2(e)} per year or;

(b) where this data is not available or inappropriate a conservative estimate shows that emissions for the next 5 years will be less than 25 000 tonnes CO_{2(e)} per year.

Note: the above data shall include transferred CO₂ but exclude CO₂ stemming from biomass.

Does the installation satisfy the criteria for installations with low emissions (as defined by Article 47 of the MRR)? Yes

If the installation is an installation with low emissions as defined above there are a number of special provisions which may be applied to provide a simplified monitoring plan. These provisions are set out in Article 47 of the MRR.

8. Monitoring Approaches

q. Monitoring Approaches

Emissions may be determined using either a calculation based methodology ("calculation") or measurement based methodology ("measurement") except where the use of a specific methodology is mandatory according to the provisions of the MRR. [MRR Article 21].

Note: the operator may subject to competent authority approval combine measurement and calculation for different sources. The operator is required to ensure and demonstrate that neither gaps nor double counting of reportable emissions occurs.

Please specify whether or not you propose to apply the following monitoring approaches. Select all monitoring approaches that are applicable to you. The consecutive sections will become mandatory based on the selected approaches.

Calculation	Yes
Measurement	No
Fall-back approach	No
Monitoring of N ₂ O	No
Monitoring of PFC	No
Monitoring of transferred / inherent CO ₂	No

9. Calculation

r. Approach Description

The calculation approach including formulae used to determine annual CO₂ emissions:

All fuels for major scheduled activities on site are brought in over our weighbridge, we are basing our annual usage on opening stocks plus the amount of fuel taken in over the weighbridge, for the reporting year, minus closing stocks. The storage facility for HFO/MFO/TAL contains less than 5% of the overall consumption and is therefore removed the requirement for uncertainty assessment of stock takes in accordance with Article 28 (2) of the MRR.

This method will be used for Heavy Fuel Oil (HFO-001), Medium Fuel Oil (MFO-001) and tallow (TAL-001). The boilers burning either HFO, MFO or tallow, are lit using bottled LPG for a pilot flame. This bottled LPG is a 'de minimis' fuel and quantities used will be based on a fuel purchase only scheme (LPG-001).

Gas/Diesel oil is stored in a tank on-site. Usage is for central heating and generators. The de minimis source stream, D-001 is for the central heating boilers. Two local in-line meters are used with meter readings taken on a weekly basis (one in cellar, one in garage). Year end calculations will then be submitted as part of the final report. Because the volumes are low, this fuel is also classed as de minimis. D-003 is for fuel used in the on site generators. Because the volumes are low, this fuel is also classed as de minimis. The volume used for the large generator is based on hours run at an average loading. The small generator volume used is based on the number of tank fills by the Maintenance Team.

Heavy Fuel Oil, Medium Fuel Oil, Tallow & bottled LPG are all measured in Kg or tonnes. Diesel is measured in Litres and the density used to convert to tonnes will be taken from supplier. NCV and EF for HFO, MFO, GO and LPG will be from the Country Specific Net Calorific Values of the EPA.

Tallow: As this bio-liquid is free from fossil fuel, as we will only source from suppliers meeting the criteria set out in Article 17(1) of the RES-D and as it is zero-rated for greenhouse gas emissions. Tallow is rarely used due to its high price and low availability.

Tallow is treated in exactly the same way as HFO/MFO from a calculation point of view; the weighbridge is used to determine the weight of tallow delivered to site. The same calculations are used to determine the carbon dioxide output of tallow but this will always be zero as the emission factor will always be zero. GD3 - 'Biomass Issues in EU ETS' has been taken into account when assessing the use of tallow on site. If and when Tallow is used on site it will be sampled and analysed 4 times a year by the supplier to determine the emission factor and NCV based on carbon analysis.

Acetylene Consumption: CO₂ emissions from acetylene are very small. Acetylene consumption will be based on invoiced quantities. We use an Emission Factor based on the stoichiometric ratio of acetylene to carbon dioxide. The

stoichiometric ratio of acetylene to carbon dioxide is based on the equation $2C_2H_2 + 5O_2 \rightarrow 4CO_2 + 2H_2O$. The molar mass of acetylene is 26.04 g/mol and for carbon dioxide the molar mass is 44.01 g/mol. The ratio of acetylene molecules to carbon dioxide molecules is 1:2, therefore the stoichiometric ratio is 26.04 : 88.02. This means that 1 g of acetylene will produce 3.38 g of carbon dioxide. Therefore the emission factor used is 3.38. This is consistent with the application of Tier 1 emission factor of 70.4 t CO₂/TJ and the Tier 1 NCV of 48 TJ/kt for acetylene (ref: EPA Document "Country Specific Net Calorific Values and CO₂ Emission Factors for use in the Annual Installation Emission Report").

The CO₂ Emission is calculated from the formula:

CO₂ emissions = Activity data * Emission factor * Oxidation factor

s. Measurement Devices

Below is a description of the specification and location of the measurement systems used for each source stream where emissions are determined by calculation

Also a description of all measurement devices including sub-meters and meters used to deduct non-Annex I activities to be used for each source and source stream.

Source Stream Refs.	Emission Source Refs.	Measurement Device Ref.	Type of Measurement Device	Measurement Range	Metering Range Units	Specified Uncertainty (+/- %)	Location
HFO-001,MFO-001,TAL-001	S1,S2,S3	Lucid (serial no 40364)	Weighbridge	20-60000	kg	0.05	Adjacent to weighbridge office
LPG-001 (Bottled)	S2,S1,S3	N/A	Fuel Purchase Based	N/A	N/A	N/A	Accounts Dept. - Killybegs
D-001 (Gas/Diesel Oil for heating)	S4,S5	Aqua Metro VZO8 and Aqua Metro VZO8	Rotary meter	4-200 litres	Litres/hr	1	Cellar (Office Building) and Garage
HFO-001,TAL-001,MFO-001	S1,S2,S3	ST-001	Tank dip	0.1-15	m	0.1	Main tank farm
D-003 (Gas/Diesel Oil for Generators)	S8,S9	Maintenance logs	Hours run	2600	Hours	N/A	Workshop
ACET-1	S7	Invoice	Supplier Invoices	N/A	N/A	N/A	Accounts Department - Killybegs

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
HFO-001,MFO-001,TAL-001	Lucid (serial no 40364)	Batch	Operator	N/A	N/A	N/A
LPG-001 (Bottled)	N/A	Batch	Trade partner	Yes	Yes	Yes

Source Stream Refs.	Measurement Device Ref.	Determination Method	Instrument Under Control Of	Conditions Of Article 29(1) Satisfied	Invoices Used To Determine Amount Of Fuel Or Material	Trade Partner And Operator Independent
D-001 (Gas/Diesel Oil for heating)	Aqua Metro VZO8 and Aqua Metro VZO8	Continual	Operator	N/A	N/A	N/A
HFO-001,TAL-001,MFO-001	ST-001	Batch	Operator	N/A	N/A	N/A
D-003 (Gas/Diesel Oil for Generators)	Maintenance logs	Continual	Operator	N/A	N/A	N/A
ACET-1	Invoice	Batch	Trade partner	Yes	Yes	Yes

t. Applied Tiers

The table below identifies the tiers applied against the relevant input data for each source stream and confirms whether a standard (MRR Article 24) or mass balance (MRR Article 25) approach is applied.

(i) The highest tiers as defined in Annex II of the MRR should be used by Category B and C installations to determine the activity data and each calculation factor (except the oxidation factor and conversion factor) for each major source stream. Category A installations should apply as a minimum the tiers listed in Annex V.

(ii) Operators may apply a tier one level lower than those referred to in sub paragraph (i) above for Category C installations and up to two levels lower for Category A and B installations with a minimum of tier 1 if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier. The justification for not applying the higher tier should be recorded when completing the tier table.

(iii) The competent authority may allow an operator to apply even lower tiers than those referred to in the sub paragraph (ii) with a minimum of tier 1 for a transition period of up to three years if the operator can demonstrate to the satisfaction of the competent authority that this is not technically feasible or would lead to unreasonable cost to apply the higher tier and provides an improvement plan detailing how and by when at least the tier referred to in sub paragraph (ii) will be achieved. The improvement plan should be referenced in subsequent table and provided to the competent authority at the time of submission of this plan.

(iv) For minor source streams operators shall apply the highest tier which is technically feasible and will not lead to unreasonable costs with a minimum of tier 1 for activity data and each calculation factor. For de-minimis source streams operators may use conservative estimations rather than tiers unless a defined tier can be achieved without additional effort (MRR Article 26(2)).

(v) Installations with low emissions as identified in section 6(d) may apply as a minimum tier 1 for determining activity data and calculation factors for all source streams unless higher accuracy is achievable without additional effort.

* Note 1: For commercial standard fuels the minimum tiers listed in Annex V of the MRR may be applied for all activities in all installations.

* Note 2: If you are intending to apply a fall-back approach please complete the table below and select "n/a" for the tiers to be applied for each source stream where a fall-back approach is used. Section 10 "Fall-back" must also be completed for these source streams.

* Note 3: For biomass or mixed fuels the emission factor is the preliminary emission factor as defined in Definition 35 Article 3 of the MRR.

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
HFO-001	S2,S1,S3	Lucid (serial no 40364),ST-001	<1.5%	Standard	4	2a	2a	N/A	1	N/A	N/A	8000	49.88	Major	Yes	n/a	n/a
TAL-001	S2,S1,S3	Lucid (serial no 40364),ST-001	<1.5%	Standard	4	3	3	N/A	1	N/A	n/a	0	0	De-minimis	N/A	n/a	n/a
LPG-001 (Bottled)	S2,S1,S3	N/A	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	1	0.01	De-minimis	N/A	n/a	n/a

Source Stream Refs.	Emission Source Refs.	Measurement Device Refs.	Overall Metering Uncertainty (less than +/- %)	Applied Monitoring Approach	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied	Estimated Emissions tCO _{2(e)}	% of Total Estimated Emissions	Source Category	Highest Tiers Applied	Justification for not applying the highest tiers	Improvement Plan Reference (where applicable)
D-001 (Gas/Diesel Oil for heating)	S4,S5	Aqua Metro VZO8 and Aqua Metro VZO8	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	37	0.23	De-minimis	N/A	n/a	n/a
ACET-1	S7	Invoice	N/A	Standard	No tier	1	1	N/A	1	N/A	N/A	1	0.01	De-minimis	N/A	n/a	n/a
D-003 (Gas/Diesel Oil for Generators)	S8,S9	Maintenance logs	N/A	Standard	No tier	2a	2a	N/A	1	N/A	N/A	1	0.01	De-minimis	N/A	n/a	n/a
MFO-001	S1,S2,S3	Lucid (serial no 40364)	<1.5%	Standard	4	2a	2a	N/A	1	N/A	N/A	8000	49.88	Major	Yes	n/a	n/a

Total Estimated Emissions for Calculation (tonnes CO_{2(e)})

16040

u. Applied tiers

Applied tiers for each source stream

Source Stream Ref.	Emission Source Refs.	Activity Data Tier Applied	Net Calorific Value Tier Applied	Emission Factor Tier Applied	Carbon Content Tier Applied	Oxidation Factor Tier Applied	Conversion Factor Tier Applied	Biomass Fraction Tier Applied
HFO-001	S2,S1,S3	4	2a	2a	N/A	1	N/A	N/A
TAL-001	S2,S1,S3	4	3	3	N/A	1	N/A	n/a
LPG-001 (Bottled)	S2,S1,S3	No tier	2a	2a	N/A	1	N/A	N/A
D-001 (Gas/Diesel Oil for heating)	S4,S5	No tier	2a	2a	N/A	1	N/A	N/A
ACET-1	S7	No tier	1	1	N/A	1	N/A	N/A
D-003 (Gas/Diesel Oil for Generators)	S8,S9	No tier	2a	2a	N/A	1	N/A	N/A
MFO-001	S1,S2,S3	4	2a	2a	N/A	1	N/A	N/A

v. Justification for Applied tiers

Justifications for the applied tiers for each major source stream where highest tiers are not currently achieved.

Source Stream Ref.	Emission Source Refs.	Justification for the applied tier	Improvement Plan Reference (where applicable)
N/A	N/A	N/A	N/A

10. Calculation Factors

w. Default Values

The table below lists, for each parameter, where default values are to be used for calculation factors.

Source Stream Refs.	Emission Source Refs.	Parameter	Reference Source	Default Value applied (where appropriate)
HFO-001,MFO-001	S1,S2,S3	NCV, EF & OxF	Ireland's National Greenhouse Gas factors as published by the EPA.	n/a
LPG-001 (Bottled)	S1,S2,S3	NCV, EF & OxF	Ireland's National Greenhouse Gas factors as published by the EPA.	n/a
D-001 (Gas/Diesel Oil for heating),D-003 (Gas/Diesel Oil for Generators)	S4,S5,S8,S9	NCV, EF & OxF	Ireland's National Greenhouse Gas factors as published by the EPA.	n/a
ACET-1	S7	NCV, EF & OxF	Ireland's National Greenhouse Gas factors as published by the EPA.	n/a

Sampling and Analysis

Do you undertake sampling and analysis of any of the parameters used in the calculation of your CO₂ emissions? No

11. Management

x. Monitoring and Reporting Responsibilities

Responsibilities for monitoring and reporting emissions from the installation are listed below:

Relevant job titles/posts and provide a succinct summary of their role relevant to monitoring and reporting are listed below.

Job Title / Post	Responsibilities
Engineering Manager	The Engineering Manager, along with the Quality Manager and Accounts Manager, is responsible for all monitoring and recording functions relating to Greenhouse Gas Emissions. The Engineering Manager is responsible for Reporting GHG emissions.
Accounts Manager	The Accounts Manager, along with the Quality Manager and Engineering Manager, is responsible for all monitoring and recording functions relating to Greenhouse Gas Emissions.
Quality Manager	The Quality Manager, along with the Accounts Manager and Engineering Manager, is responsible for all monitoring and recording functions relating to Greenhouse Gas Emissions.

Attachment	Description
Weighbridge Cert 2016.pdf	UFI Weighbridge Cert 2016
Weighbridge Cert Sept 2016.pdf	Weighbridge Cert Sept 2016
Lucid weighbride Cert 31082017.pdf	Lucid Weighbridge Calibration Cert 31/08/2017

y. Assignment of Responsibilities

Details of the procedure used for managing the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR:

This procedure identifies how the monitoring and reporting responsibilities for the roles identified above are assigned and how training and reviews are undertaken.

Title of procedure	ORGANISATION AND MANAGEMENT RESPONSIBILITIES
Reference for procedure	QM04
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Organisational structure with a description of roles and responsibilities to ensure the proper management of the assignment of responsibilities for monitoring and reporting within the installation and for managing the competencies of responsible personnel in accordance with Article 58(3)(c) of the MRR.
Post or department responsible for the procedure and for any data generated	Administration, Environmental & Engineering
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

z. Monitoring Plan Appropriateness

Details of the procedure used for regular evaluation of the monitoring plan's appropriateness covering in particular any potential measures for the improvement of the monitoring methodology:

Title of procedure	Procedure for calculation of Greenhouse Gas Emissions
Reference for procedure	ENV-402
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Calculation procedure for submission of Greenhouse Gas Emission figures. This procedure will cover the following: <ul style="list-style-type: none"> - Checking the list of emissions sources and source streams, ensuring completeness of the emissions and source streams and that all relevant changes in the nature and functioning of the installation will be included in the monitoring plan; - assessing compliance with the uncertainty thresholds for activity data and other parameters (where applicable) for

the applied tiers for each source stream and emission source; and

- assessment of potential measures for improvement of the monitoring methodology applied.

Post or department responsible for the procedure and for any data generated	Engineering & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

aa. Data Flow Activities

Details of the procedures used to manage data flow activities in accordance with Article 57 of the MRR:

Title of procedure	Procedure Outlining the Sequence of Interactions for Monitoring and
Reference for procedure	ENV-403
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Outlines the roles, responsibilities and sequence of interactions for the monitoring and reporting of Greenhouse Gas Emissions on site to manage data flow activities in accordance with Article 57 of the MRR.
Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A
List of primary data sources	HFO/MFO - Weighbridge Tallow - Weighbridge Bottled LPG - Fuel Purchase Scheme Diesel - In-Line Metering (for central heating) and hours run at an average loading/number of tank fills (for generators) Acetylene - Consumption
Description of the relevant processing steps for each specific data flow activity.	5.0 PROCEDURE
Identify each step in the data flow and include the formulas and data used to determine emissions from the primary data. Include details of any relevant electronic data processing and storage systems and other inputs (including manual inputs) and confirm how outputs of data flow activities are recorded	5.1 The sources of GHG emissions are clearly identified (ENV401) and communicated to all appropriate individuals within the organisation (managers and staff responsible for ordering combustible fuels). 5.2 Contributory consumption GHG materials (i.e. fuels) are clearly identified and communicated to the appropriate

individuals within the organisation (managers and staff responsible for ordering combustible fuels).

5.3 All fuels are ordered by the production manager.

5.4 Receipt and quantity of fuel consumed is recorded for the individual fuels as follows:

5.4.1 Tallow (TAL-001), Heavy fuel oil (HFO) and Medium Fuel Oil (MFO)

By the weights recorded in the weighbridge, which are recorded in the form of a weighbridge docket. The supplier also gives a reading of volume discharged in the form of a meter reading docket (delivery docket).

5.4.2 Diesel

By metered flow recordings taken by the production manager weekly (applicable to the office and garage boilers).

5.4.3 Commercial propane (LPG)

Delivery dockets received from BOC gases outlining the number of LPG gas bottles bought.

Acetylene Consumption: CO2 emissions from acetylene are very small. Acetylene consumption will be based on invoiced quantities.

Submit relevant documents to record data flow activities

Attachment	Description
N/A	N/A

bb. Assessing and Controlling Risks

Details of the procedures used to assess inherent risks and control risks in accordance with Article 58 of the MRR:

Title of procedure	Procedure for Assessing and Controlling Risks and Data Flow Activities
Reference for procedure	ENV - 408
Diagram reference	N/A

Brief description of procedure. The description should cover the essential parameters and operations performed	Risk assessment carried out to identify control risks in the monitoring and reporting of greenhouse gases to assess inherent risks and control risks in accordance with Article 58 of the MRR.
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Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

cc. Quality Assurance of Metering / Measuring Equipment

Details of the procedures used to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Title of procedure	Procedure for Maintenance and Calibration of Equipment used to determine factors impacting on GHG emission Estimations
Reference for procedure	ENV - 404
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Outline the roles, responsibilities for the maintenance and calibration of equipment to ensure quality assurance of measuring equipment in accordance with Article 58 and 59 of the MRR.

Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

dd. Quality Assurance of Information Technology used for Data Flow Activities

Details of the procedures used to ensure quality assurance of information technology used for data flow activities in accordance with Article 58 and 60 of the MRR:

Title of procedure	Procedure for Assessing and Controlling Risks and Data Flow Activities
Reference for procedure	ENV - 408
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Risk assessment carried out to identify control risks in the monitoring and reporting of greenhouse gases. 2 servers are used for the majority of information necessary so data is constantly backed up, to ensure quality assurance of

information technology used for data flow activities in accordance with Article 58 and 60 of the MRR.

Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

ee. Review and Validation of Data

Details of the procedures used to ensure regular internal reviews and validation of data in accordance with Articles 58 and 62 of the MRR.

Title of procedure	Procedure Internal Audit and Review Procedure
Reference for procedure	ENV - 406
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	The quality manager is responsible for internal quality audits. It is the responsibility of the quality manager to organise and prepare all internal quality audits and to keep all relevant details on file. It is the responsibility of the quality manager draw up an audit schedule which will outline all areas to be audited, the auditor responsible for the audit and the section to be audited in accordance with Articles 58 and 62 of the MRR.

Post or department responsible for the procedure and for any data generated	Quality Manager
Location where records are kept	GHG Emissions Public File, Reception Office
Name of IT system used	N/A
List of EN or other standards applied	N/A

ff. Corrections and Corrective Actions

Details of the procedures used to handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR:

Title of procedure	Procedure for Corrective and Preventive Actions relating to the recording, measurement and reporting of Greenhouse Gas Emissions
Reference for procedure	ENV - 405
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Outlines actions to be taken in the event of a non-conformance or potential non-conformance in any aspect of recording, measurement and reporting of GHG's, to

handle corrections and corrective actions in accordance with Articles 58 and 63 of the MRR.

1. Record details of any non-conform arising from the following processes to the relevant responsible person authority or the verifier depending on the significance of the non-conform.
 - (a) Weighbridge fault or out of calibration.
 - (b) Missing weighbridge docketts.
 - (c) Incorrect tallies between ordered stock and accounted for stock.
 - (d) Incomplete data entry to fuel usage and other relevant files
 - (e) Incorrect calculation of data.
 - (f) Incorrect Reporting of data
 - (g) Obsolete procedures
 - (h) Incorrect or out-dated conversion factors used.
 - (i) Diesel flow meter fault.
 - (j) Preventative action form
2. The Engineering manager and quality manager will evaluate the significance of the non-conform.
3. Decide on what action to take and on any further action that can be taken to prevent re-occurrence and write all details in the in the CAR Form.
4. A decision regarding the acceptability of the non-conforming work can be made either by the engineering manager or quality manager.
5. If the non-conform is serious in nature, which may have an effect on reported work or work that will be used in future reporting exercises, a decision to inform the appropriate authorities will be made.
6. If a fault develops on a vital piece of equipment such as the weighbridge-alternative arrangements will be made to use another nearby calibrated weighbridge.

Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Server
Name of IT system used	N/A
List of EN or other standards applied	N/A

gg. Control of Outsourced Activities

Details of the procedures used to control outsourced processes in accordance with Articles 59 and 64 of the MRR.

Title of procedure	N/A
Reference for procedure	N/A
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	No out source activities have been noted by the Operator, however, the operations are regularly reviewed and should some out source activities arise they will be controlled in accordance with Articles 59 and 64 of the MRR.
Post or department responsible for the procedure and for any data generated	N/A
Location where records are kept	N/A
Name of IT system used	N/A
List of EN or other standards applied	N/A

hh. Record Keeping and Documentation

Details of the procedures used to manage record keeping and documentation:

Title of procedure	Procedure Outlining the Sequence of Interactions for Monitoring and Reporting
Reference for procedure	ENV - 403
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	Outline the roles, responsibilities and sequence of interactions for the monitoring and reporting of Greenhouse Gas Emissions on site to ensure they are kept for a minimum of 10 Years.
	All fuels are ordered by the production manager.
	Receipt and quantity of fuel consumed is recorded for the individual fuels as follows:

5.0 PROCEDURE

5.1 The sources of GHG emissions are clearly identified (ENV401) and communicated to all appropriate individuals within the organisation (managers and staff responsible for ordering combustible fuels).

5.2 Contributory consumption GHG materials (i.e. fuels) are clearly identified and communicated to the appropriate individuals within the organisation (managers and staff responsible for ordering combustible fuels).

5.3 All fuels are ordered by the production manager.

5.4 Receipt and quantity of fuel consumed is recorded for the individual fuels as follows:

5.4.1 Heavy fuel oil (HFO)/Medium Fuel Oil (MFO) and Tallow (Tal).

By the weights recorded in the weighbridge, which are recorded in the form of a weighbridge docket. The supplier also gives a reading of volume discharged in the form of a meter reading docket (delivery docket).

5.4.2 Diesel

By metered flow recordings taken by the production manager weekly (applicable to the office and garage boilers for central heating). The volume used for the large generator is based on hours run at an average loading. The small generator volume used is based on the number of tank fills by the Maintenance Team.

5.4.3 Commercial propane (LPG)

Delivery dockets received from BOC gases outlining the number of LPG gas bottles bought.

Acetylene Consumption: CO₂ emissions from acetylene are very small. Acetylene consumption will be based on invoiced quantities.

It is the responsibility of the production manager to transfer all Dockets, Receipt and Meter reading information to the accounts office.

The Assistant production manager is responsible getting the weighbridge calibrated each year.

Diesel meters will be calibrated every five years as per

manufacturers instructions.

All Dockets and meter readings are transferred to the accounts manager, and are recorded in the appropriate fuel usage file in the S drive/Environmental folder/Fuel Usage.

The dockets are stored in the appropriate files by the accounts manager.

These figures are then utilised by the engineering manager, for the calculation of CO2 emitted from the installation when submitting the AEIR report and the pre-verification report.

Post or department responsible for the procedure and for any data generated	Engineering, Quality & Administration
Location where records are kept	Servers
Name of IT system used	N/A
List of EN or other standards applied	N/A

ii. Risk Assessment

The results of a risk assessment that demonstrates that the control activities and procedures are commensurate with the risks identified:

Attachment	Description
N/A	N/A

jj. Environmental Management System

Does your organisation have a documented Environmental Management System? Yes

Is the Environmental Management System certified by an accredited organisation? No

12. Changes in Operation

kk. Changes in Operation

Article 24(1) of Commission Decision 2011/278/EC requires that Member States must ensure that all relevant information about any planned or effective changes to the capacity activity level and operation of an installation is submitted by the operator to the competent authority by 31 December each year. Article 12(3) of the MRR further provides that Member States may require information to be included in the monitoring plan of an installation for the purposes of meeting these requirements.

Details of the procedure used to ensure regular reviews are carried out to identify any planned or effective changes to the capacity activity level and operation of the installation that have an impact on the installation's allocation:

The procedure specified below cover the following:

- planning and carrying out regular checks to determine whether any planned or effective changes to the capacity activity level and operation of an installation are relevant under Commission Decision 2011/278/EC; and
- Procedures to ensure such information is submitted to the competent authority by 31 December of each year.

Title of procedure	PROCEDURE FOR HOLDING INTERNAL QUALITY AUDITS AND MANAGEMENT REVIEW MEETINGS
Reference for procedure	QSOP01
Diagram reference	N/A
Brief description of procedure. The description should cover the essential parameters and operations performed	<p>It is the responsibility of the quality manager to draw up the internal audit schedule and ensure that internal audits are carried out according to the procedure outlined and in a timely fashion.</p> <p>It is the responsibility of the quality manager to schedule and prepare for management review meetings and to keep all relevant records on file.</p> <p>It is the responsibility of each auditor to draw up the checklist for his/her area.</p> <p>This procedure refers to 'R-053 - Internal audit schedule', which includes GHG verification</p>
Post or department responsible for the procedure and for any data generated	Quality Department
Location where records are kept	Server
Name of IT system used	N/A

13. Abbreviations

II. Abbreviations Acronyms or definitions

Abbreviations acronyms or definitions that have been used in this monitoring plan:

Abbreviation	Definition
N/A	N/A

14. Additional Information

Any other information:

Attachment	Description
Boiler burner photos.docx	Confirmation of new No. 3 boiler thermal input
12 Dec 2017 new Installation name.pdf	Installation name change to PELAGIA KILLYBEGS

15. Confidentiality

mm. Confidentiality Statement

It is the Environmental Protection Agency's policy to make information received by it in the course of its work open to inspection by any person on request. This is in accordance with the provisions of the European Communities (Access to Information on the Environment) Regulations 2007 to 2011.

In the event that you considered that some of the information being submitted of a confidential nature, then the nature of this information and the reasons why it should be considered confidential, with reference to the European Communities (Access to Information on the Environment) Regulations 2007 to 2011 and any amendments must be explicitly requested using the facility below. The Board of the Environmental Protection Agency will consider the requests and if the information can be deemed as confidential and necessary.

Notwithstanding any request for confidentiality, the Environmental Protection Agency explicitly reserves the right to release data to the Commission, including emissions and allocations to the public, on the basis that the data will be used for the purposes foreseen in Directive 2003/87/EC of the European Parliament and of the

Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

Please tick this box if you consider that any part of your form should be treated as commercially confidential/sensitive: false

END of Appendix I.