



Annex O

MARS HSSE Management Plan

**ENGINEERING, PREPARATION, DECOMMISSIONING AND
RECYCLE OF FLUMINENSE FPSO**

For

the BIJUPIRA AND SALEMA (BJSA) DECOMMISSIONING Project

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References

Table 1 HSSE Plan Related Documents

<i>Ref., Number, and doc. Title</i>	
[1]	EHS-POL-100 EHS Policy
[2]	EHS-POL-101 Environmental and Waste Management Policy
[3]	HRO-MAN-200 Employee Handbook
[4]	HRO-FRM-503 Training Record
[5]	EHS-PRO-351 Site Specific Emergency Response Plan – Frederikshavn
[6]	EHS-PRO-322 Permit to Work System
[7]	EHS-FRM-510 Cold Work Permit
[8]	EHS-FRM-500 Hot Work Permit
[9]	EHS-FRM-512 Confined Space Entry Permit
[10]	EHS-FRM-515 Lock-Out Tag-Out Permit
[11]	EHS-PRO-327 Working at Height
[12]	EHS-FRM-533 Workplace Inspection Report
[13]	EHS-WIN-410 Crane & Rigging Inspection and Colour Coding (LAG)
[14]	EHS-WIN-411 Incident Management Team Instructions
[15]	EHS-PRO-334 Cranes & Rigging (LAG)
[16]	EHS-PRO-302 COSHH Control of Substances Hazardous to Health
[17]	EHS-PRO-304 Dangerous Goods/Hazardous Materials Transportation
[18]	EHS-PRO-305 Hazard Communications – Right to Know
[19]	EHS-PRO-306 Waste and Materials Management Plan
[20]	EHS-PRO-307 Hazardous Materials Response
[21]	EHS-PRO-309 Incident and Injury Reporting and Investigation
[22]	EHS-PRO-301 Welding and Flame Cutting
[23]	EHS-PRO-315 Personal Protective Equipment
[24]	EHS-PRO-321 Environmental Monitoring
[25]	EHS-PRO-337 Incident Management Procedure
[26]	EHS-PRO-338 Emergency Action and Medical Evacuation Guidelines
[27]	EHS-FRM-254 Sound Level Form

[28]	EHS-FRM-509 Management of Change Form
[29]	QMS-MAN-200 Quality Manual
[30]	EHS-PRO-332 Scaffold and Ladder Safety
[31]	HRO-PRO-320 Training Procedure
[32]	HRO-FRM-504 Training Matrix Form
[33]	HRO-FRM-505 Competence Matrix Form
[34]	EHS-PRO-320 SIMOPS procedures
[35]	EHS-PRO-329 Asbestos procedure
[36]	EHS-PRO-372 Procedure for Handling of NORM (Naturally Occurring Radioactive Material)
[37]	EHS-PRO-371 Mercury
[38]	EHS-PRO-374 COVID-19
[39]	EHS-PRO-308 Legal and Other Requirements
[40]	QMS-PRO-308 Procedure for Document Control and Sharing Information
[41]	IMS-PRO-304 Interested Parties
[42]	EHS-PRO-373 Lifesaving rules
[43]	EHS-PRO-316 Occupational health procedure
[44]	EHS-PRO-352 Health & Safety Organization
[45]	EHS-PLN-604 H.S.S.E. Activity Plan
[46]	EHS-POL-102 Stop work policy
[47]	EHS-PRO-381 Prevention of Dropped Objects
[48]	EHS-WIN-410 Stored Energy Awareness
[49]	IOGP 423 H.S.S.E. Management – guidelines for working together in a contract environment
[50]	IOGP 459 Life-saving rules
[51]	EHS-WIN-408 Scaffold and ladder inspection work instruction
[52]	HRO-PRO-302 Code of Business Conduct and Ethics

Table above with procedures replace Appendix B from ITT Section VIII – HSSE.

Abbreviations

AMO	Arbejdsmiljøorganisation (Work environment organization)
APV	Job Safety Analysis (risk assessment)
C.R.	Company Representative
CEO	Chief executive officer
Company	SHELL BRASIL PETRÓLEO LTDA.
Contractor	Modern American Recycling Services Europe A/S
COSHH	Control of Substances Hazardous to Health
EHS	Environment, Health, and Safety
Fluminense FPSO	Vessel
FPSO	Floating Production Storage and Offloading
HAZMAT	Hazardous Materials
HIRA	Hazard Identification & Risk Assessment
HR	Human resources
HSSE	Health, Safety, Security and Environment
IOGP	International Association of Oil & Gas Producers
ISO	International Organization for Standardization
JSA	Job Safety Analysis
KPI	Key Performance Indicator
LMRA	Last minute risk assessment
LTI	Lost time injury
M.A.R.S.	Modern American Recycling Services Europe A/S
NIHL	Noise induced hearing loss
NORM	Naturally Occurring Radioactive Material
OHS	Occupational Health and Safety
PCP	Phencyclidine
PM	Project manager
PPE	Personal Protective Equipment
PTW	Permit to work system
QHSSE	Quality, Health, Safety, Security and Environment

RA	Risk Assessment
SDS	Safety Data Sheet
SIF	Serious Incident Frequency
SoW	Scope of Work
SM	Site Manager
Subcontractor	Contractor of Contractor
TBT	Toolbox Talk
TRIF	Total Recordable Injury Frequency
Vessel	Fluminense FPSO

Terms and definitions

Table 2 Terms and definitions

Term or Designations	Definition / Description
Audit	Systematic, internal documented process which obtains evidence and evaluates it objectively to determine whether or not the audit.
Adapted or Restricted Work Activity Case	Number of workdays where injured person of work-related incident which considers no lost workdays performs “adapted work” or “restricted work”.
Blood borne pathogen	Pathogenic microorganisms that are present in human blood and cause disease in humans.
Cold Work	Operations which are not covered by Hot Work activities. (Examples: Work at height, Work aloft, housekeeping).
Collective and personal protective equipment	Collective protective equipment is used to protect a group of people from specific hazards that may result in physical health problems.
Confined space	Space that is large enough for an employee to enter and perform the assigned work but that has a limited or restricted means for entry or exit.
Controlled substance	Opiates (including heroin); Hallucinogens (marijuana, mescaline, peyote); Cocaine; Phencyclidine (PCP); prescription drugs used without valid prescription or prohibited by

	Company for use on site.
Competent Person	Someone who by virtue of their training or experience, or a combination of both, has been deemed competent by the Company for specific function or functions through an assessment process.
Days away from work case	Cases where employee or contractor is away from work one day or more after the day of work-related injury or illness.
Ergonomics	Or human factors. Scientific discipline concerning interactions between humans and other elements of a system, e.g. their professional activity.
External service	Third party that supports the company about Occupation Health and Safety aspects (e.g., for medical examinations).
Environmental incident	Situation, which results in negative impact for the environment (soil, air, water).
First aid case	Limited to treatment for only minor injuries with non-prescription medication and, if necessary, subsequent observation.
Hierarchy of controls	Risk should be reduced to the lowest reasonably practicable level by taking preventive measures, in order of priority.
High Potential Incident	An Incident or Near Miss in which the potential consequence(s) could result in: <ul style="list-style-type: none"> • Permanent total disability, fatality or multiple fatalities • Major or massive damage to asset, community and/ or environment.
Heavy lift	Lift greater than 25000kg and/or greater than 75% of the rated capacity (per load chart) of the crane or hoist being used.
Hot work	Activity that results in sparks, fire, molten slag or hot material, which has the potential to ignite a combustible or flammable substance. Gas free.

Incident	An unplanned event or chains of events that result or could result, as in the case of near misses, in injury or illness to people or damage to assets, the environment or community.
Lost time incident	Number of workdays where injured person of work-related incident was not able to perform his/her tasks. and absent from work. Also “days away from work”.
Loss of primary containment (LOPC)	An unplanned or uncontrolled release of any material from primary containment irrespective of whether the material is released into the environment or into a secondary containment or into other primary containment not intended to contain the material released under normal operating conditions.
Last minute risk assessment (LMRA)	Short risk assessment, carried out by the person that executes a job, prior to start working (stop and think) and necessary to discover risk factors.
Medical treatment case	All other cases that do not result in Days Away from Work or Restricted Duty but are more serious than first aid cases.
Motor vehicle	Any self-propelled means of transportation, heavy equipment and other motor or electrically moveable equipment capable of transporting its operator and workers.
Motor vehicle Incident (MVI)	An incident involving a vehicle driven on business by an employee, whether on or off road, that has resulted in fatality, injury, or damage to assets, irrespective of cost of repair or responsibility cause.
Near miss	Situation with potential negative consequences for the health/safety of the employees, the environment, assets, and reputation of the company.
Permit to work	Formal, written authorization to carry out certain activities. This document indicates that hazards or risks associated with the activity to be performed.
Positive alcohol test	Having a blood alcohol concentration above 0,00% while on duty.
Risks and hazards	A hazard is a source or situation that can cause injury or illness to personnel or damage to property and is intrinsically linked with people, equipment,

	environment, products and the organization. The risk is the probability or threat of a hazard resulting in an adverse event while causing injury, illness or property damage, damage to the reputation or the service a company provides. Example: HAZARD = working at height, Risk = falling.
Working at height	Includes all situations where people are at risk of falling from one level to another and all circumstances where work is executed at height of > 2 m.

1 General Information

1.1 Purpose and validity

This Project H.S.S.E. Execution Plan is developed for the decommissioning and disposal of Fluminense FPSO and defines Modern American Services Europe A/S (hereinafter M.A.R.S. Europe) requirements and risk control measures for all M.A.R.S. Europe activities for the entire period of the project.

During execution of this project, it is M.A.R.S. Europe utmost priority to ensure the safety of its personnel, subcontractors, and client. M.A.R.S. Europe will adapt to and integrate with the Projects Safety culture as well as the M.A.R.S. Europe own safety initiatives.

This Project H.S.S.E. Plan includes a summary of:

- The scope of the activities to be conducted.
- H.S.S.E. Organization Capability Plan.
- Roles and Responsibilities for Health, Environment and Safety of all concerned in the activities.
- The potential risks and control measures during the execution of the activities.
- Compliance assurance plan.
- Site specific requirements, regulation, and competency-based trainings.
- Emergency Response and Spill Prevention Actions.
- Environment Protection and Waste Management Process.
- Comprehensive Safety and Occupational Health program.
- The management of measures implemented to operate equipment and protect personnel should night working be required.

The objectives of this document are:

- To summarize all health, environment and safety engagements and procedures established at the start and during the progress of the project. This to establish an integrated H.S.S.E. specific plan for the entirety of the activities to be conducted on this project.
- To create awareness and culture of safety first towards all aspects of the project and the surrounding environment. M.A.R.S. Europe culture is Safety First.
- To ENSURE an absolute safety culture between different contractor interfaces through detailed engineering, coordination, communication, and planning.

The H.S.S.E. Plan is valid until final completion of the Fluminense FPSO disposal project. Updates will be provided during disposal project.

1.2 Project description

Fluminense FPSO was originally built in 1974 by Kockums Mekaniska Verkstad AB shipyard in Malmo, Sweden as the “Sea Saint” Ultra Large Crude Carrier (ULCC). It was fabricated under Lloyds Register Rules as a steam turbine tanker. The vessel changed names to the “Safina Sahara” in 1981 and later to “Sahara” in 1984. In 2003, the tanker was converted to the Fluminense FPSO at the Jurong Shipyard in Singapore. The FPSO was designed to store 1.2 million barrels of oil, using the center cargo tanks for oil storage. The wing tanks are not used and are void spaces, thus

providing the double-sided single bottom concept. There are 8 cargo tanks, 4 ballast tanks, 2 slop tanks and 15 void tanks.

1.3 Principal interfaces

M.A.R.S Europe principal interfaces linked to the H.S.S.E. Management system are represented by document control and sharing information. (MDR- Share point and “Mellora” document Centre). Procedure QMS-PRO-308 [40] establish a method for sharing and controlling documents and information, internal and external. M.A.R.S. Europe will make sure that we keep a high standard for document control and create a safe space for sharing information.

1.4 Legislative requirements

M.A.R.S Europe management system is according to national legal requirements. To ensure that legal and other requirements are consistently reviewed and met by the organization a procedure was developed by M.A.R.S.(EHS-PRO-308) [39]. This procedure applies to the monitoring and compliance with all marine and general health, safety and environmental legal requirements for M.A.R.S. Europe operations, facilities, and sites.

1.5 Distribution

This document will be distributed to:

Table 3 M.A.R.S. Europe personnel

<i>Function</i>	<i>Name</i>
CEO	Kim Thygesen
CPO	Cecilie Nielsen
Project Manager	TBA
Head of Engineer	Pawel Serafinski
Site Manager	Jacob Panduro
H.S.S.E. Manager	Alexandru Simion
Site H.S.S.E Supervisor	Flemming Jensen

Table 4 Client Personnel

<i>Function</i>	<i>Name</i>
To be determined by Client	Per Client Document Distribution Matrix (DDM)

Table 5 Other parties' personnel

<i>Function</i>	<i>Name</i>
Waste Management	Marius Pedersen
NORM & Mercury Handling	Semco Maritime A/S

This Project H.S.S.E. Plan will be communicated by the M.A.R.S. Europe H.S.S.E. Team in internal safety meeting(s) and discussed by the Project Manager, Project

Engineer, Site Manager and/or Site Supervisor with all parties involved in the project activities.

2 Scope of work description

Project involves the planning, engineering, dismantling and disposal of Fluminense FPSO. Main activities are to provide of a yard suitable for receipt of the structures, dismantling, demolition, and transport of waste.

M.A.R.S. Europe scope of work is as following:

- Yard mobilization to receipt of Fluminense FPSO.
- Receipt of Fluminense FPSO.
- Make Safe, Mapping, Hazmat inspection and Cleaning.
- Materials / Equipment sorting and segregation, Waste management
- Piece large cutting and transport to process field.
- Cutting/processing into desired pieces for recycling.
- Material's transport for final disposal.

3 M.A.R.S. Europe HSSE Management System

3.1 General description

The philosophy behind our Q.H.S.S.E. Management System is based on the requirements as described in the ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and Executive Order 1409:2020 standards. (Annex 12, 13, 14)

M.A.R.S Europe is certified by Bureau Veritas in ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and Executive Order 1409:2020 standards.

The H.S.S.E. Management System has been integrated into M.A.R.S. Europe's overall management system. It influences everything we do as a company.

In Annex 15 are listed M.A.R.S Europe most important procedures to fulfill the ISO standards. (Annex 15 replaces Appendix A Contractor HSSE-MS from ITT Section VIII - HSSE)

3.2 HSSE leadership and commitment

Leadership cultivates the foundation of culture to empower employees to achieve the company mission and realize how vital each of their contributions is to further those goals. M.A.R.S Europe have implemented a weekly management and operation meetings, for a better connection and communication between operations and management regarding all projects on the yard. Objectives, missions, visions, project progress, H.S.S.E. statistics, Lessons learned, weekly activities and operations, major topics. For workforce supervision the Site supervisors' program (according to organization structure) is working efficient, in which every team is aware of the responsibilities and daily operations, for better workforce management and planning. Leadership training combined with technical safety training ensures that safety leaders are grown within an organization.

H.S.S.E. department implemented a training schedule for new employees and site supervisors, to gain more experience and improve their skills and safety culture.

Training focuses on taking charge(responsibility) and leading the employees, inspiring and being an example for them in daily operations. Learning how to motivate them, know each employee and their capabilities will make the team more effective. (Risk management and mitigating actions, permit to work system ownership, how to conduct a toolbox talk, meeting attendance to learn the process, competency matrix for site supervisors to be fulfilled, radio communication standard practices, crowd, and crisis management).

M.A.R.S Europe is providing internal / external courses, seminars for H.S.S.E. leadership to the management team.

4 M.A.R.S. Europe policies

4.1 QHSSE Policy

M.A.R.S. Europe embraces Quality, Health, Safety and Environment (Q.H.S.S.E.) objectives as core business values.

The company shall endeavor to provide for employee's livelihood, client needs, and shareholder returns through the application of management systems that protect the environment, safeguard employee's health eliminates injuries to people. M.A.R.S. Europe believes these goals may best be achieved by:

- Senior Management leadership and involvement.
- Education of employees on safe work performance.
- Proactive hazard identification, elimination, and control.
- Continuous Q.H.S.S.E. improvement process.
- Promotion of an "Incident and Injury Free Safety Culture" both on and off the job.
- Accepting that Safety is good business and a critical aspect of a high-performance organization.
- Taking action to reduce environmental impact before it happens.

M.A.R.S. Europe's business plans include measurable H.S.S.E. Objectives, Targets and Goals so that everyone who performs work for the company is responsible to help achieve these targets.

M.A.R.S. Europe's scope is onshore decommissioning, disposal, and recycling of offshore and maritime structures.[1]

M.A.R.S. Europe H.S.S.E. and Quality Policies: Annex 8 & Annex 9.

4.1.1 Equal opportunity policy

M.A.R.S. Europe provides equal opportunity to all qualified employees and applicants without regard to race, colour, religion, gender, national origin, age, disability, or any other category protected by Danish and European laws. This policy applies to all aspects of the employment relationship, including recruitment, hiring, compensation, promotion, transfer, disciplinary action, layoff, return from layoff, training, and social and recreational programs. All such employment decisions will be made without unlawfully discriminating [3].

4.1.2 Drugs and alcohol policy

M.A.R.S. Europe is committed to providing a safe, healthy, and productive workplace for its employees, contractors, and visitors. M.A.R.S. Europe recognizes that drugs and alcohol can affect an individual's fitness to work and can be a contributing factor in workplace injury and incidents. M.A.R.S. Europe drug and alcohol policy are designed to keep all employees, visitor, and contractors as safe as is practicable while on site. The implementation of this policy requires the cooperation and support of all our employees, contractors, and visitors [3].

4.1.3 Stop work policy

M.A.R.S. Europe philosophy is that, in the performance of our work, the Health, Safety and Welfare of our people, the protection of assets and the environment are of primary concern.

Therefore, should any occasion arise where it is felt that to commence or continue with a work activity, the stop work policy (EHS-POL-102) [46] applies:

**ALL PERSONNEL ARE EXPECTED AND
OBLIGATED TO CEASE OPERATIONS
WHENEVER THEY FEEL THAT CONDITIONS
ARE UNSAFE OR THERE IS AN
UNACCEPTABLE RISK TO PERSONNEL,
EQUIPMENT OR THE ENVIRONMENT.**

Figure 1 Stop work policy

4.1.4 M.A.R.S. HSSE Objectives

Occupational health and Safety objectives

1. 200 permit to work inspections in 2022.
2. Receive observation reports on psychological issues in 2022
3. Decrease the lost time injury frequency in 2022, compared to 2021.

Action Plan

1. Daily site inspections by EHS department
Adequate resources for inspections

- Document site inspections
- Weekly QEHS meetings
- 2. Campaign for promotion of psychological observation reports
 - Training in observation reporting, digitally and paper version
 - Occupational health training
 - AMO meetings
- 3. Basic safety training
 - Share safety alerts with all production workers
 - Monitoring of statistics

Key Performance Indicators

1. HSEQ Reports checklist for site inspection
 - Action trackers from weekly QEHS meetings
2. HSEQ Report statistics and trends
 - Annual management review
 - Training matrices/records
 - Action tracker from AMO meetings
3. Training matrices/records
 - EHS statistics

Environmental objectives

1. Minimum 90% of complete structural weight to be recycled in 2022.
2. Receive minimum 50 observation reports on environmental issues in 2022.
3. Upgrade minimum one waste stream in 2022.

Action Plan

1. Planning of demolition and cleaning
 - Proper sorting of materials, waste, and equipment.
 - Employee waste management and segregation training.
 - Ensuring adequate resources for demolition
2. Campaign for promotion of environmental observation reports
 - Training in observation reporting, digitally and paper version
 - Environmental training

3. Market search on possibilities for upgrading
Investigate solutions for implementation of upgrade(s)

Key Performance Indicators

1. Weekly site plans
Waste accounting and reporting.
Waybills.
Training matrices/records
2. HSEQ Report statistics and trends
Annual management review
Training matrices/records
3. Material breakdown list
Report from waste subcontractor

Environmental objectives allow M.A.R.S Europe to be more energy efficient.

4.2 External environment

IMS-PRO-304 define the Interested Parties (clients, customers, subcontractors, suppliers, workers, board members, and other interested parties) of M.A.R.S. Europe and determines the needs and expectations of each group.

4.3 Ethics and compliance

M.A.R.S Europe embraces the highest standards of honesty, ethics, and integrity as core business values, and will do business only in lawful and ethical ways. The Company expects both its employees and anyone doing business on its behalf to comply with all applicable laws.

M.A.R.S Europe implemented a procedure “Code of Business Conduct and Ethics” (HRO-PRO-302).[52]

The purpose of the procedure is:

- to make clear the standards of behavior and conduct that the Company has adopted to govern its worldwide operations
- to provide guidance when faced with difficult situations while conducting business on behalf of the Company
- to provide guidance on how to relate to our fellow employees, our customers, our vendors, or governments.

Our Code of Business Conduct and Ethics (“Code”) is an overview of how we should strive to conduct our business with a commitment to integrity. The code has integrated guidelines for compliance and compliance with law and regulations.

5 M.A.R.S. Europe organizational and responsibility chart

5.1 General

The different operations within the project require a stringent coordination between the various personnel involved, with clear and unique command lines. The organization will be built up with well experienced and trained personnel. (Refer to Annex 3 M.A.R.S. Europe Organizational Chart)

5.2 HSSE Key Personnel

Reference is made to Annex 4 which includes the specific key positions within the M.A.R.S. Europe dismantling and disposal project team organization that shall be accountable and directly responsible for developing and implementing the different components of the Contractor H.S.S.E. Execution Plan.

5.3 Roles and responsibilities

During the project preparation and project execution, below described assigned roles and responsibilities. For project management team see the Fluminense Quality plan.

Project Manager:

- The M.A.R.S Europe Project Manager have the following responsibilities, accountabilities, and assignments of activities concerning H.S.S.E.:
- Champion H.S.S.E. by providing leadership in the implementation of all H.S.S.E. initiatives.
- Agree with the strategy and the implementation of the H.S.S.E. plans.
- Decide with senior managers, line managers and H.S.S.E. managers the necessary resources required to achieve specified activities and task achievement of project key performance indicators.
- Ensure that each sub-contractor has developed and implemented a detailed H.S.S.E. plan.
- Ensure that the sub-contractor and supplier management are involved in H.S.S.E. implementation.
- Provide adequate resources for emergency response systems.
- Accountable for ongoing development and implementation of engineering and procurement H.S.S.E. activities and H.S.S.E. practices.
- Ensuring appropriate engineering health and H.S.S.E. standards are developed and implemented.
- Specify and make available resources to enable execution of H.S.S.E. activities.
- Monitor incident/hazard reports.
- Schedule site visits and audit participation.
- Review of audit findings and close-out reports.
- Review of incident and hazard reports and approval of close-out reports.
- Review with H.S.S.E. department, quality, and frequency of sub-contractor H.S.S.E. activities.
- Require regular H.S.S.E. reviews, audits, and hazard assessments of project operations.

- Participate in investigations of serious or potentially serious incidents and hazard investigations.
- Review overall project H.S.S.E. performance.
- Involvement and attendance at H.S.S.E. meetings.
- Review and discuss incident/hazard reports.
- Consult with H.S.S.E. advisors on H.S.S.E. promotional concepts.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).

Site Managers:

The M.A.R.S. Europe Site Manager have the following responsibilities, accountabilities, and assignments of activities concerning H.S.S.E.:

- Studies specifications to plan procedures of the construction process to ensure the health and H.S.S.E. of the crew and all environmental concerns are efficient for all facilities and port operations.
- Staff projects according to necessary manpower for each phase of the construction process.
- Accountable for ongoing development and implementation of project H.S.S.E. activities and H.S.S.E. practices during all projects.
- Review and monitors H.S.S.E. commitment by all crew and sub-contractors to Company and client standards.
- Specify and make available resources to enable execution of H.S.S.E. activities.
- Monitor incident/hazard reports.
- Monitor hazard assessments and JSA's.
- Review and discuss incident/hazard reports.
- Review and approve H.S.S.E. training initiatives.
- Review work planning and hazard analysis requirements.
- Consult with H.S.S.E. managers on H.S.S.E. promotional concepts.
- Review quality of sub-contractor H.S.S.E. activities and promote meaningful feedback.
- Review quality of JSA and inspection reports.
- Determine with superintendents/foremen and sub-contractors balance between H.S.S.E. and workload and develop appropriate interventions.
- Motivate and inspire superintendents /foremen and H.S.S.E. personnel through positive discussion on H.S.S.E. initiatives.
- Identify and discuss with superintendents /foremen concerns with disciplinary aspects of H.S.S.E. program and develop suitable interventions.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).
- Ensure that management of change procedure is followed and approved when methods of execution are identified prior / during site operations.

Project Engineer:

The M.A.R.S. Europe Project Engineer have the following responsibilities, accountabilities, and assignments of activities concerning H.S.S.E.:

- Communicate safety objectives and expectation to the Project Team.
- Communicate safety expectations and desired results to Contractors.
- Accountable to Project Manager for safety performance of relevant project personnel and Contractors.
- Endorse and support implementation, verification and close out of the Site Specific H.S.S.E. Plan.
- Actively participate in kick-off meetings with Contractors.
- Participate in Safety Workshops, Safety Inspections, and relevant audits.
- Participate in incident investigation process and responsible for incident reporting process and systems.
- Provide Subject Matter Expert advice to the Site H.S.S.E. Supervisors.
- Participate in periodic site safety assessments.
- Review and endorse Risk Assessments and Method Statements.
- Report incidents to the relevant Project Manager.
- Ensure hazards and mitigation steps identified in mitigation steps are included in work procedures.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).
- Ensure that engineering solutions and documentation comply with the safe execution requirements.
- Ensure that contract requirements are implemented.
- **Site Supervisors:**
- The M.A.R.S. Europe Foreman have the following responsibilities, accountabilities, and assignments of activities concerning H.S.S.E.:
- Participate in and adhere to all project H.S.S.E. instructions, procedures and H.S.S.E. activities.
- Train employees to perform work safely.
- Report all incidents and hazards to their supervisor.
- Wear Personal Protective Equipment (PPE) and clothing provided and promote the PPE usage through the employees.
- Advise fellow employees of hazardous situations.
- Present a mature approach to working safely.
- Comply with statutory requirements.
- Train, instruct, and reinforce employees in the use of safe work methods, materials, tools, and equipment.
- Monitor and enforce employee adherence to safe work practices and other requirements.
- Conduct regular worksite H.S.S.E. inspections and take corrective action when required.
- Promote a high degree of employee participation – solicit ideas for promoting H.S.S.E. at work from employees.
- Motivate employees to report all incidents and hazards.
- Plan and incorporate H.S.S.E. into all work plan and activities.
- Participate in incident investigations and corrective actions.
- Run the daily and weekly H.S.S.E.-meetings for appropriate crew members.

- Conduct JSAs, risk assessment and permit to work system on selected tasks.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).
- Focus on SIMOPS operations, coordinating the toolbox talk / operations between teams involved and address operations potential risk (RA, LMRA).
- Ensure that LMRA is implemented together with permit to work system. (LMRA checklist). Establish common understanding of risks, mitigating action, and methods to perform operations, sharing information with team members.

All Other Personnel / Sub-contractors:

All M.A.R.S. Europe personnel are accountable to their appropriate managers or supervisors, and have the following responsibilities, accountabilities, and assignments of activities concerning H.S.S.E.:

- Participate in and adhere to all project H.S.S.E. instructions, procedures and H.S.S.E. activities.
- Report all incidents and hazards to their supervisor.
- Wear Personal Protective Equipment (PPE) and clothing provided.
- Advise fellow employees of hazardous situations.
- Present a mature approach to working safely.
- Comply with statutory requirements.
- Report hazardous conditions.
- Provide H.S.S.E. suggestions.
- Report non-injury/damage events.
- Remain alert for colleague's safety.
- Conduct task/work assessments.
- Participate at H.S.S.E. meetings.
- Participate in H.S.S.E. inspections.

OHS Representatives: (The Occupational Health and Safety OHS Representative represents the employees. OHS Representative shall be the contact person between the employees and the Occupational Health and Safety (OHS) organization. Elected by employees). EHS-PRO-330 Health and Safety Risk Assessment (APV) is referring to OHS representative trainings and legal requirements. An external work environment course is mandatory for each safety representative, according to Danish legal requirements.

- Participate in and adhere to all project H.S.S.E. instructions, procedures and H.S.S.E. activities.
- Report all incidents and hazards to their supervisor.
- Wear Personal Protective Equipment (PPE) and clothing provided.
- Present a mature approach to working safely.
- Provide H.S.S.E. suggestions.
- Remain alert for colleague's safety.
- Participate at H.S.S.E. meetings.
- Participate in H.S.S.E. inspections.
- Be in contact with the employees.
- Identify risks and make complaints if the working conditions are not safe and healthy.

- Participate in Occupational Health and Safety (OHS) meetings.
- Assist with APV (risk assessment).
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).

5.4 Responsibilities concerning HSSE documentation

Concerning health and safety-related documentation, following responsibilities (parties directly or indirectly involved in the specific task) are established:

Table 6 Responsibilities concerning HSSE documentation

Task	Project Management	Site Management	Supervision	O.H.S. Representatives	Yard Workers (including subcontractor)
Site induction	✓	✓	✓	✓	✓
RA & MS	✓	✓	✓	✓	-
Start work meetings	-	✓	✓	✓	✓
Toolbox talks	-	✓	✓	✓	✓
(Q)H.S.S.E. briefings	✓	✓	✓	✓	✓
Daily inspections	✓	✓	✓	✓	-
Incident/accident reporting	✓	✓	✓	✓	-
Performance reporting	✓	✓	-	-	-

5.5 HSSE field support team

H.S.S.E. Manager, designated H.S.S.E. Supervisor position and Project Permit manager are the planned resources for the decommissioning and disposal project of Fluminense FPSO.

5.6 Working time

Extended working times are only allowed in special cases and with permission of the Project Manager (PM). If required a modified Risk Assessment (RA) is foreseen, covering the extension of the working time.

Work will be performed in two shifts and each shift will work under separate permit to work system. Handover checklist and meetings will be used to share essential information's between shifts. Lighting system is in place to cover both shifts and assessed according to operation's needs.

In case if work shall be done in low lighting condition when the need arises, Project Team shall undertake the following steps:

Planning:

- Project Team needs to identify priorities and set targets for improvement.

- Assess whether the lighting design is suitable and safe for the type of work being performed.
- Also need to consider any future changes in the work conditions as this may require different lighting design.

Monitoring:

- The monitoring and reviewing of lighting conditions is important in ensuring proper health and safety performance.
- Pause and consult procedure is applicable.
- Monitoring involves checking of workplace conditions and ensuring site requirements are met.
- Reviewing involves the checking of standards, planning and control and changing them, when necessary, to improve health and safety, for example installing new lighting designs may create different health and safety risks, therefore standards may need to be changed or altered.

Risk Assessment:

- Site Manager must assess possible risks in workplace, for example, whether work lighting arrangements are suitable or whether pose any significant risks to workers using workplace.

Where there is a possible risk to workers, action needs to be taken to remove, reduce or control.

5.7 Lifesaving rules

Life Saving Rules aim to target safety hazards, which M.A.R.S. employees, contractors, and visitors working/visiting at the M.A.R.S. Europe site in Frederikshavn can be exposed to. This procedure (EHS-PRO-373) [42][50] aims to put focus on safe behaviour, how to conduct oneself and to look after others working on site, thus embracing the buddy system and is in accordance with IOGP 459. Lifesaving rules are based on incidents resulting in serious injuries, which have occurred throughout the shipyard industry and O&G industries in recent years. Focusing on the subjects chosen for these procedures does by no means exclude anyone working on site from staying alert, when working in areas not covered specific by these procedures and adhering to all site rules and regulations.

Implementation of lifesaving rules

During the safety induction process M.A.R.S. employees are familiarised with lifesaving rules concept. Further trainings are provided to raise the lifesaving rules procedure knowledge. Refresh courses is also part of the training schedule. A poster will be prepared and posted on the yard with M.A.R.S. Europe lifesaving rules.

5.8 Health and working environment

According to the Danish law on working environment, any company with employees must create a Health & Safety Risk Assessment (APV).

The assessment should consist of five phases:

- 1) Identification and surveying of the Company's total work environment

- 2) Description and assessment of the Company's health and safety problems
- 3) Inclusion of the Company's record of absenteeism due to sickness
- 4) Prioritization of the Company's health and safety issues and action plan
- 5) Guidelines to follow up on the action plan.

The Health & Safety Risk Assessment must be revised any time there is a significant change in the workplace that have implication for health and safety, or at least every three years.

Health and working environment requirements are monitored as per procedure EHS-PRO-308 [39] Legal and other requirements.

5.9 Occupational health

Occupational health procedure (EHS-PRO-316) [43] aims to provide rules and guidance for all employees and contractors working at the M.A.R.S. Europe site in Frederikshavn on how to stay in good health both during and after working for M.A.R.S. Europe. The procedure further set rules and guidance for health testing. All workers should know their rights and duties, be educated in how to maintain a good health by taking precautions when working on site.

Occupational Health & Safety Organization (EHS-PRO-352) [44] was developed by M.A.R.S Europe to ensure that the health and safety work is performed in a cooperative manner between management and employees.

5.10 Third part HSSE interfaces

Regularly meetings are performed with third parties performing work on M.A.R.S. Europe Site (planning the operations, logistics, H.S.S.E. topics). All third parties are working under M.A.R.S Europe permit to work system, being trained by H.S.S.E. department with Permit to Work system, Risk assessment. Permit to work audits are performed on the yard by H.S.S.E. Supervisor, checking and monitoring the operations of M.A.R.S Europe third parties.

Third parties H.S.S.E. procedures/ forms are reviewed/bridge by M.A.R.S Europe before approval in document center. After approval M.A.R.S employees will receive a familiarization training.

5.11 Work care program

M.A.R.S Europe is ensuring that personnel involved in site activity live and work in a safe, healthy, and ethical environment. Human rights audit is performed by M.A.R.S Europe team, ensuring that international human rights and labor laws are followed. Employee safety representatives and AMO meetings ensure that a secure environment is in place for M.A.R.S employees. E.H.S department monitor the safe, health and hygienic environment on M.A.R.S yard, ensuring that emergency response, quality rest and privacy, infrastructure, and facilities (offices/ canteens), exposure to risks health are monitored.

5.12 Worker welfare plan

M.A.R.S Europe implemented a welfare program for its employees to improve life balance. An employee who feels appreciated will be more fulfilled, satisfied and more productive. This will not lead only to high productivity but also satisfied customers. A satisfied employee will also not search for other job opportunities, and MARS will get to keep the best talents and record low employee turnover.

M.A.R.S Europe employees are working under Industrial Agreement, are enrolled to a pension scheme and a Health insurance, allowing to get access to different medical services, without need of appointment at the personal medic. Salary rises according to years in MARS and a Sick bonus is part of welfare plan.

All projects' achievements are celebrated with hot dogs, hot meals, cakes, or refreshments.

M.A.R.S Europe is always looking to bring something back for local community and employees. Using sponsorship, MARS helps local children football club.

M.A.R.S Europe created a 2-year study program together with a school from Frederikshavn, allowing students to develop and integrate in the workforce field.

6 Project Control

6.1 General

This section outlines the requirements and methods for control of work activities.

The H.S.S.E. Plan is to be applied together with the Project Quality Plan, Execution Plans, Incident and Injury Reporting and Emergency Response Procedure. Combined they shall as a minimum allow to:

- Safely undertake all disciplines outlined in the Scope of Work.
- Protect against damage to any property and material, on site within the boundaries of related compound working areas of the Project Parameter.
- Protect the environment.
- Clearly inform all parties concerned about the potential hazards & risks whilst working on site and related areas.

6.2 Quality objectives

M.A.R.S. Europe has developed and installed a documented Quality System that will ensure its products and services will meet the requirements of the Project. It will operate to the standard as depicted in ISO 9001:2015 and ensure that all staff are fully conversant with the standard and the requirement for its implementation and maintenance. Reference is given to Quality Manual QMS-MAN-200 [29] or Fluminense Quality Plan.

6.3 Management of change

6.3.1 General

Managing change means managing risk and the Risk Assessment is the primary tool to be utilized in managing the risks arising from changes.

Managers and Supervisors are responsible for ensuring that suitable Risk Assessments are carried out when managing changes within their area of responsibility. The goal of the Risk Assessment is to bring together the key personnel who have the right competencies and relevant experience for the purpose of discussing, collecting, and assessing concerns, ideas, and operational inputs which will reduce risks and ensure the safe and effective execution of the change(s) or task(s) under consideration.

The Site Manager along with the Project Manager, H.S.S.E. Manager shall, if within their range of competence and/or authority, carry out an assessment of both the change and the associated risk to allocate correct categorization. As a minimum, they shall discuss the change proposed and agree to the preliminary assessment of the risk (Low, Medium, or High). The Site Manager is responsible for defining the change (i.e.: what is the change and what are the reasons for the change?), along with input from any additional personnel or departments as appropriate. See EHS- FRM-509 [28].

It is the responsibility of the on-site supervisor to access the level of change in conjunction with the Project Manager/ H.S.S.E. Manager.

6.3.2 Minor deviation

Minor changes are within the scope of normal operations and are covered by Basic Operating Procedures or JSA's, standards, policies, and generic risk assessments. Work task is well within the capability and competence of the people at the site. Minor changes shall require approval of immediate supervisor and do not require completion of the management of change form.

6.3.3 Major deviation

Major changes deviate from the scope of work or standards, procedures, and assessments. The assessment of the work task is deemed to be within the capability of people and equipment at the site. Major changes require an approved management of change form. If the changes are major and persistent, a workplace assessment is carried out at the site.

6.3.4 Critical deviation

Critical changes require further assessment by project personnel. Critical changes require an approved management of change form. See EHS-FRM-509 [28].

6.3.5 Recording

A record of authorized changes during scope of work will be included within each work specific Method Statement. This record will be task specific related to the intended operations.

7 HSSE Programs

7.1 Competency

M.A.R.S. Europe will ensure that selection measures and competency of hired candidates into the Project match with necessary skills and ability to undertake general and specific activities both in office and on site including medical and

physical fitness to work. Additional specific trainings will be provided in case of identification of deficiencies in knowledge and increase competency.

Personnel will be evaluated on their performance by their supervisors and/or Site Manager. Documentation of the evaluations will be kept on site.

7.2 Training plan

M.A.R.S. Europe has established a training matrix for yard workers. The training matrix shows the level of education, experience and side-by-side training that are required for the specific job type. Further, a thorough competence requirement description has been established for each of the job types. To ensure that all yard workers possess the required level of training and competencies, M.A.R.S. Europe has established procedures for Recruiting, Onboarding, Internal Courses and Evaluation/Performance Plans.

According to Training Procedure (HRO-PRO-320) [31] and Training and Competence Matrix Form (HRO-FRM-504, HRO-FRM-505) [32][33] Training Record Form (HRO-FRM-503) [4].

All new employees will undertake an H.S.S.E. training program, familiarizing with M.A.R.S. Europe policies, procedures and permit to work system. All trainings are recorded in the new “Musskema” software by HR department, allowing to oversee the training status of each employee. After 4 weeks since started work, an employee evaluation will be conducted, assessing the training needs, safety culture and performance. M.A.R.S. Europe has a training room facility, equipped with all necessary to deliver high standards trainings. A training schedule will be presented in the H.S.S.E. Activity Plan.

7.2.1 Site supervisor program

The production workers at M.A.R.S. are divided into 5 subgroups: cleaners, cutters x2, scaffolders, maintenance, and logistic. Each subgroup has one to four dedicated site supervisors, depending on the size of the group.

As a policy, M.A.R.S. do not hire a supervisor directly – it is always yard workers who shows dedication, motivation, leadership skills, and high level of competencies that are offered to be promoted to supervisor.

When a production worker is promoted to site supervisor, he/she will be handed the site supervisor job description.

Job Title:	Site Supervisor	Job Category:	Yard Worker
Department/Group:	Production Worker	Employee Nr:	ME-
Location:	M.A.R.S. Frederikshavn	Work Hours:	37 hrs / week
Salary:	Hourly paid	Position Type:	Full time
Role Description:		Individual Tasks:	
<p>The site supervisor is the leader of a team of approx. 5 workers. All jobtypes at the yard has minimum one designated site supervisor.</p> <p>The site supervisor must:</p> <ul style="list-style-type: none"> - Be able to perform Job Safety Analyses - Be trained in issuing and opening work permits - Conduct Toolbox Talks - Be familiar with all relevant work- and safety procedures issued by MARS. - Ensure that all jobs are carried out in safe, environment conscious and efficient manner. - Must assist, if need it, with other work-related operations. - Must attend all internal / external trainings or drills. - Ensure that all established reporting procedures and routines are followed. - Attend safety meetings and safety drills. - Report any undesired events, unsafe practices or near misses observed and attempt to rectify. 		<ul style="list-style-type: none"> - Division of tasks among team members - Monitor productivity of team and individual workers - Report staffing requirements - Plan overtime - Coordination of tasks - Ensure the team has proper tools and that the tools are maintained properly - Daily reports to supervisor and/or foreman <p>Authorization</p> <ul style="list-style-type: none"> - All have the authorization to stop the work, if the area is not safe 	
Competencies			
Qualifications and Education Requirements			
<p>No specific education or competence requirements. Site Supervisors are chosen from the Production Workers, based on assessment and evaluation of the individuals. Site Supervisors are chosen based on their ability to lead, understand and use of permit system, communication skills, and authority.</p>			
Preferred Skills			
<p>Basic fire fighting First aid Team Management experience Fluent in English</p>			

Figure 2 Job description, Site Supervisors

All site supervisors need to go through internal training, dependent on their subgroup:

Table 7 Internal training site supervisors program

Subgroup / Internal Training	M.A.R.S. EU Polices	Permit to work system	Hot Work	Cold Work	COSHH	HIRA	QHSE Reporting (Observation card, incident reporting, document center).	P.P. E.	Emergency Response Plan	Waste management	Handheld radios	Respiratory protection	Standard Operating procedures	Emergency action and medical Evacuation	Job Safety Analysis Program	Leadership and H.S.S.E. Responsibilities
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Cleaner	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Cutter	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Scaffolder	x	x	x	x		x	x	x	x		x		x	x	x	x
Maintenance	x	x	x	x	x	x	x	x	x	x	x		x	x	x	x
Logistic	x	x	x	x	x	x	x	x	x	x	x		x	x	x	x

All site supervisors take part in the weekly operational meeting, together with the Site Manager, H.S.S.E. Manager, and CEO. Further, site supervisors take part in, are often lead, every pre-job safety meeting / toolbox talk.

7.3 HR Plan and efficient execution

M.A.R.S Europe HR department implemented a software to ease HR process and a procedure HRO-WIN-401 “Evovia.dk”. Evovia.dk is a HR-platform and should be seen as a work tool, that collects and eases the process with employee information. Evovia.dk offers following modules: EDP, Ongoing 1:1, Competence spiderweb, TDP, WPA, Sickness Absence Dialogue, CV, Competence development, manager evaluation, Onboarding, Offboarding and Survey.

M.A.R.S Europe has currently implemented the following plan:

- EDP

The purpose With the EDP Module is to send out yearly questionnaires to employees before their annual EPV (employee survey) conversation. Subsequently the module is used for reporting of the conversation, registration and follow up on agreements made during the EPV conversation.

- CV

The purpose with EDP module is to register and document alle employees’ competences, certificates, education, driver license, and any work-related vaccines and bloodwork. EDP module is used as a tool for the daily management of production workers.

- Onboarding

Is a tool that can make be used, to secure that our new employee is well received and that all information about the employee is passed. In onboarding there are several employee satisfactions surveys, which after a certain time, is sent out to the new employee.

- Survey, Internal – external

Can be used for both intern and extern. It’s a tool that makes it possible for us, to get feedback on the product that we deliver, regarding extern costumers. It can also be used to make intern surveys, so for example, thriving on the workplace can be examined and evaluated on.

EDP modules is used for collecting, storing, and analyzing information about our employees and customers, ensuring and efficient execution of HR operations. Internal audits and management review are quality checks performed to assess the processes.

7.4 HSSE Activity plan

An H.S.S.E. activity plan is developed yearly by M.A.R.S Management, considering company strategy, objectives, existing project, employees need of training, and safety campaigns. (EHS-PLN-604) [45]. All activities are recorded in M.A.R.S Europe Action tracker form to track the status of each planned activity. H.S.S.E. activity plan will also include the safety holds points, according to project executions planning. H.S.S.E. Activity plan will be in accordance with IOGP 432.

7.5 M.A.R.S. Europe safety booklet

The H.S.S.E. department developed a safety booklet to increase safety culture, create a safe and healthy workplace, protecting the environment. Each M.A.R.S. employee received a printed copy (A6 Size), using it in day-to-day operation.

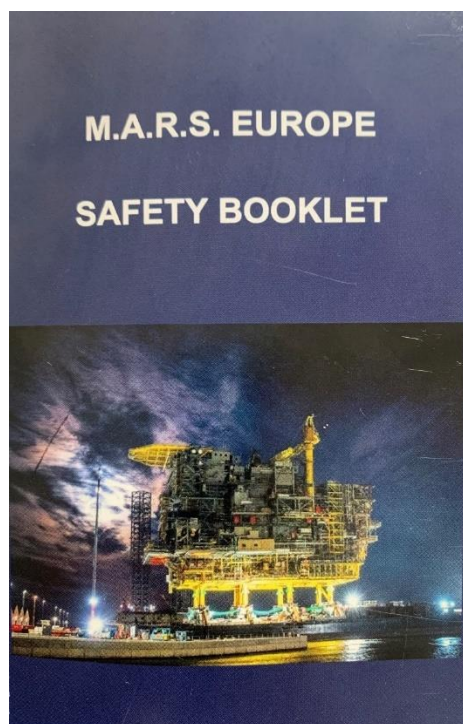


Figure 3 M.A.R.S. Europe safety booklet cover page

7.6 Office plan

M.A.R.S Emergency Response Plan (Annex 16) is including M.A.R.S site layout, together with office plans. Client offices are equipped with conference room, toilets, kitchen, training room and area for lunch. Parking available in near vicinity of the offices. A cleaning schedule is in place to ensure the quality of the services. During safety induction each person is familiarized with the facilities available on site.

8 Site Specific HSSE requirements

8.1 Access

8.1.1 Access application forms for personnel

Before access is granted to M.A.R.S Europe yard, each personnel or subcontractor must meet the above requirements:

- M.A.R.S. Europe Safety Induction. (Safety induction form to be filled).
- No M.A.R.S. Europe employee or subcontractor will undertake any form of work unless trained, certified and competent. (M.A.R.S. HR department, Subcontractor HR department).
- Any other requirements to be determined depending on operations/activity.

8.1.2 Safety induction

M.A.R.S. Europe will perform a site safety induction for all new employees. This presentation must discuss site specific regulations, Q H.S.S.E. aspects and risks as well as required preventive measures that must be followed.

Information relating to general health and safety matters, site-specific information and statutory notices will be displayed on the site notice boards.

- Introduction to M.A.R.S
- Organizational overview
- Site Rules
- Security and access
- M.A.R.S H.S.S.E. Management System
- Emergency procedures (evacuation / fire / first aid)
- Incident / hazard reporting
- Use of PPE
- Trainings
- Site Tour

Safety induction needs to be carried out on the first day of arrival. The new employee will not be allowed to work prior to completing site safety induction.

8.1.3 New personnel

M.A.R.S. Europe plans to hire both experience people and inexperienced. Experienced personnel will carry supervision and lead on new, inexperienced persons. All personnel must complete courses needed for designated job prior starting the job. A student program is developed by M.A.R.S. Europe together with local authorities to integrate students (inexperienced persons) in workforce environment. The study period will be for 2 years, familiarising with the environment, equipment, machines, operations, and a job will be offered for the competent students at the end of the program.

8.1.4 Transport and vehicle entrance

All drivers shall have appropriate and valid driver license. All drivers will be made aware of the site rules and must follow them (speed limit, personal protective equipment, smoking, mobile phone etc.). The access to site is controlled by M.A.R.S guard employees, registering in the logbook.

External vehicles entering site will require following functional safety equipment:

- Fire extinguisher.
- First – aid kit.
- Suitable spare wheel and tire along with suitable tools for changing (e.g. wheel wrench and jack).

- Driver, centre, and passenger side rear - view mirrors.
- Road safety kit (flood light, cones/warning triangles, reflective vests).
- Wheel nut indicators (including all types of buses).

For Heavy vehicles (e.g. telescopic cranes):

- Single-piece rims as available.
- Reversing alarm system (incl. other vehicle with limited rear-visibility).
- Wheel chocks (on passenger side).
- Wheel nut indicators.

8.1.5 Vehicle speed limit

Vehicle speed limit depends on the vehicle type:

- 20 km/h for all vehicles.
- 10 km/h for Heavy vehicles

8.1.6 Driver behaviour safety

Apart from momentary changes of hand positions on the steering wheel, M.A.R.S. Europe requires that all M.A.R.S. Europe employees have two hands on the steering wheel while driving Company or personal vehicles on Company business. In other words, employees must not initiate or answer a text message, email, or any other form of non-voice communication while driving a vehicle. It is strongly prohibited that M.A.R.S. Europe employees use mobile phones while operating a M.A.R.S. Europe vehicle. While mobile phones may be left switched on during a trip, the driver should safely leave the road and bring the vehicle to a stop in a safe area before initiating or answering a telephone call. Passengers may answer the phone but should not distract the driver or act as a middleman in any conversation. Subject to the limitations and recommendations of this policy, drivers may use a hands-free device to answer telephone calls, but this practice should be the exception and not the normal course of conduct. Violation of the cellular phone policy and texting prohibition shall include disciplinary action, up to and including termination.

8.2 Health management

This Health Management System defines the processes that will be utilized to discharge responsibility in respect to safeguarding employee health. This process is built upon corporate procedures, the health requirements of the Project applicable regulatory requirements and other local regulation applicable.

8.2.1 Medical insurance

Work related insurance in Denmark is mandatory. All M.A.R.S. Europe employees are covered for occupational injury.

8.2.2 First aid organization

In each First Aid structure serving the Project, the number and level of qualified First Aid personnel shall be defined in accordance with the number of associated personnel, the particulars of the location, health risk assessment in such a way to ensure efficiency of activities aimed at preserving employee health. As a minimum there will be 1 trained worker for every 50 people on site. There will be also a trained worker with every work group operating in designated workplace. All M.A.R.S. Europe Q H.S.S.E. coordinators will have first aid training.

The first point of contact for any injury in site will be the M.A.R.S. Europe onsite medical point (site manager office). The first assessment will be carried out there by the qualified personnel. The decision will be made by the team to move the patient for further treatment to the Hospital (Sygehus Vendsyssel or Regionshospital Nordjylland) [5].

M.A.R.S Europe implemented a First Aid Van (clearly marked), equipped with all rescue and first aid equipment, for fast reaction on the site. (First aid kits, rescue at height equipment, rescue from confined space equipment, breathing apparatus, lifejackets, stretcher, e.q) The van is parked across the site entrance, and only authorized person could use this van, and only in case of emergency.

8.3 HSSE supporting documents

8.3.1 “Mellora” (QHSSE Reports)

M.A.R.S. Europe implemented a new QHSSE reporting tool named “Mellora” (www.mellora.no). This system is meant to streamline our reporting (Observations, Incidents, Near-Misses) and Risk Assessments, JSAs and Quality Risk Analyses, to create checklists for various inspections and audits, publish messages and information and to improve M.A.R.S. Europe’s document structure. Digitalizing our safety management system by integrating “Mellora” is fitting M.A.R.S needs to monitor incidents efficiently, analyse trends, reduce administrative work, and report faster all observations card regarding workplace and environment. Using the “Mellora” Info Centre option, all employees will be informed about any updates in the H.S.S.E. management system manual, procedures, forms, and distributing various information. Easy access to the H.S.S.E. management system will make our employees work effectively and efficiently, engaging them in safety programs, improving safety culture and awareness, building a safe workplace.

8.3.2 Hazard Identification and Risk Assessment (HIRA)

Risks will be defined by using Risk Matrix and risks will be ranked/evaluated based on:

- The potential consequences (Consequence) with no safeguards. Select the corresponding matrix consequence level.
- How probable (Likelihood) the above consequence would be considering the safeguards in place. Select the corresponding matrix likelihood level.
- The Consequence and Likelihood levels are combined to determine the Risk Ranking from the matrix. This also determines required follow-up action.

Tables below are describing ranking of risks, consequence, and likelihood.

Table 8 Risk assessment matrix

PROBABILITY	Frequent	-5	-10	-15	-20	-25
	Likely	-4	-8	-12	-16	-20
	Occasional	-3	-6	-9	-12	-15
	Unlikely	-2	-4	-6	-8	-10
	Highly unlikely	-1	-2	-3	-4	-5
		Negligible	Slight / Minor	Moderate / Significant	Serious	Very Serious
CONSEQUENCE						

Table 9 Risk criteria

RISK CRITERIA (ALARP = As Low As Reasonably Practicable)		
Low Risk	L	Operations can proceed without further controls. Consider any cost benefits which can be achieved.
Medium Risk	M	May need further consideration or unacceptable risk reduction measures / contingency plan being applied to achieve ALARP.
High Risk	H	Operations must not proceed. Alternative methods or risk reduction measures must be developed.

Table 10 Probability guidelines

PROBABILITY GUIDELINES	
Highly Unlikely	A possible event but never experienced. Extremely remote chance of this occurring.
Unlikely	An event is not likely during operations or equipment design life.
Occasional	An infrequent event that may occur during operations or equipment design life.
Likely	An event that is likely to occur one or more times during operations or equipment design life.
Frequent	A common event that is likely to occur one or more times a year.

These matrices will be used to support the planned activities at site, supported by Method Statements & drawings before the start of any activities.

“Mellora” Risk assessment is in accordance with above tables, allowing to reduce the processing time and digitalizing H.S.S.E. department.

A projects specific risk registry will be developed during the scope to monitor all risk raised. The risk registry will be updated during the project, and project completion.

8.3.3 Last Minute Risk Assessment

Before the start of an important or high-risk task, a “Last Minute Risk Assessment (LMRA)” is executed. It is an individual self-assessment which be a short time to pause and think before executing the job.

LMRAs’ are required for work designated as high risk.

The LMRA is based on a checklist. Refer to Annex 5 for LMRA checklist.

IF THE LMRA IS NEGATIVE THE PAUSE & CONSULT PROCEDURE IS FOLLOWED

8.3.4 Permit to Work Requirements

The Permit to Work process is MANDATORY for prescribed tasks including general work, hot work, confined space entry and isolation Lock-out/Tag-out [10] on Decommissioning and Disposal project, where M.A.R.S. Europe undertakes the scope of work.

All scope of work will be managed in strict compliance with the Permit to Work System outlined in EHS-PRO-322 [6] and the following M.A.R.S. Europe Permits will be applied:

Table 11 Type of work permits

Work Permit Type	Safety Instruction No.
Cold Work Permit [7]	EHS-FRM-510
Hot Work Permit [8]	EHS-FRM-500

Each operation/activity/task will be covered by a specific permit to work, according to the area, activity, procedures, SIMOPS involved, PPE, or other specific task. A specific risk assessment is associated with the permit to work system, assessing the hazards, mitigating actions and exposure to other personnel who are not directly involved in the operations. M.A.R.S. Europe use a 3-layer paper permit system, a copy of the permit will be posted on the Permit Board, one with the responsible authority performing the task and one with H.S.S.E. permit manager. Permits are registered in the permit register sheet. All questions and issues must be raised within the M.A.R.S. Europe H.S.S.E. representative.

8.3.5 Method Statements

Method Statements are documents that provide all involved parties with guidance and a methodology for the intended activities. These Method Statements include drawings and a step by step written methodology that allows tasks to be performed the safest way. In the Method Statements there are:

- **Safety Points:** These are placed between different tasks and are designed to reiterate the tasks to be performed, the associated risks and contingency measures to remove / reduce the risks.
- **Hold Points:** These are placed between tasks that require verification and sign off that previous tasks are completed as per the methodology and before proceeding further.

Safety points and hold points will be conducted through E.H.S meetings for work packages and an action tracker will register the task, roles and responsibilities assigned, employees' involvement and documents issued.

8.3.6 Checklist

Two types of Checklists are distinguished:

- Equipment Specific Checklist:

These Checklists have been prepared for the operator of the machine / equipment to verify and ensure that the machine / equipment is ready for use and that all necessary checks are completed. These are mandatory and it is the responsibility of the operator to fill this checklist in on a daily basis or after every reconfiguration (e.g. setup of telescopic crane). These Checklists are available in English and Danish languages. A maintenance plan developed by M.A.R.S Europe is in force.

- Operation Specific Checklists:

These Checklists have been prepared for the Supervisor in charge of the operation to reiterate and ensure all necessary requirements, precautions & verifications are completed prior to start of the operation. These are mandatory and it is the responsibility of the Supervisor to fill this checklist in for each Operator. These Checklists are available in English and Danish languages.

Throughout of the Dismantling and Disposal projects, the checklists will be used as shown in Table below. During operation new checklist might be added and current one will evolve the match the project requirements.

Table 12 Operations checklists

<i>Item</i>	<i>Responsible</i>	<i>Frequency</i>	<i>Doc. No.</i>
Mobile Crane Checklist	Crane Operator	Daily or after every repositioning	EHS-FRM-535
Heavy Lift Checklist	Heavy Lift Supervisor	Every Lift	EHS-FRM-531 EHS-FRM-535
Crane Rigging Checklist	Rigging (Crane) Supervisor	Every Re-rigging	EHS-FRM-522 EHS-FRM-536

8.4 Hierarchy of controls

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.

Based on the Risk Assessment, measures must be determined to eliminate or at least reduce the risk. To effectively define these controls, the "hierarchy of controls" must be followed:

8.4.1 Elimination of Risk

If possible, avoid the risk altogether, for example do the work in a different way, taking care not to introduce new hazards; use mechanical pile cropping techniques to avoid the use of jack hammers and subsequent exposure to Hand Arm Vibration Syndrome (HAVS).

8.4.2 Substitution of Risk

Replace the material or process with a less hazardous one. For example, use a small Mobile Elevated Work Platform (MEWP) to access work at height instead of step ladders. Care should be taken to ensure the alternative is safer than the original.

8.4.3 Engineering Control

Use work equipment or other measures to prevent falls where you cannot avoid working at height. Install or use additional machinery such as local exhaust ventilation to control risks from dust or fume. Separate the hazard from operators by methods such as enclosing or guarding dangerous items of machinery/equipment. Give priority to measures which protect collectively over individual measures.

8.4.4 Administrative Control

These is for identifying and implementing the procedures you need to work safely. For example: reducing the time workers are exposed to hazards (e.g. by job rotation); prohibiting use of mobile phones in hazardous areas; increasing safety signage and performing risk assessments.

8.4.5 Education and Training

Ensuring that workers and others understand the risk and know what they must do, for example by giving toolbox talks on health issues, or running through the method statement during induction training.

8.4.6 Personal Protective Equipment (PPE)

M.A.R.S. Europe will provide required Personal Protective Equipment (EHS-PRO-315) [23] to work on the yard:

- Safety helmet.
- Safety glasses.
- Safety footwear.
- Safety Overalls with long sleeves (fireproof where required).
- Gloves appropriate to task.
- Hi Visible Work clothes.

Additional PPE may be required according to the site rules or the task specific risk assessment, this may include:

- Safety harness + double retractable lanyards.
- Life vests when working near water.
- Gas Detector

- Escape breathing mask (EBDS).
- Hearing protection.
- Best available gloves for operations type (e.g Manual handling operations, lifting operations): cut resistant or impact gloves in accordance with EN388.

During extreme weather, M.A.R.S. Europe will also provide:

- Appropriate PPE, i.e., winter coat, winter boots, winter overalls, raincoat, summer overalls, etc.
- Other specific PPE requirements may be identified during Pre-Operations.

8.5 Q H.S.S.E. Meeting and Talks

An essential element in the Q H.S.S.E. policy of a project is a good instruction. Instructions on how to work in a safe way can be communicated through meeting/ talks including the following:

8.5.1 Toolbox Talks

A toolbox talk is delivered in English and/or Danish languages, to inform the project personnel about general risks, how these risks should be prevented, or at least reduced and the planning of the operation (method, tools, rescue equipment). These toolbox meetings will be organized by the Site manager or the Site Supervisor. In this way people are encouraged to think about the on-going topics and interactive discussions are held where identifying, minimizing, and reporting of risks are highlighted. All the toolbox talks need to be registered (subject, name, signature) and recorded in H.S.S.E. System. (EHS-FRM-530). A permit to work is not valid, if a toolbox talk was not held by the participants.

Every Monday/ Wednesday and Friday, M.A.R.S H.S.S.E. department and Site's manger are conducting a toolbox with all the yard, briefing about future operations/projects, safety moments and lessons learned, PPE usage, and/or other relevant topic.

8.5.2 Safety Alerts/ Lesson Learned

Both incident reporting and the distribution of safety alerts following an accident, incident, near miss or even an observation contribute to hazard communication. The contents of safety alerts can be included in the toolbox talks, can be delivered immediately in the field or in a safety training. Safety Alerts will be posted on Information Boards on M.A.R.S. Europe facilities.

8.5.3 Initial Task Briefing

Before the start of any activity an Initial Task Briefing is delivered to all personnel directly involved with the operations, together with any other personnel who may be directly affected by the operations. At this briefing, the planned activities will be explained by means of method statements and drawings, the risk assessments will be discussed and the necessary control measures to mitigate these risks will be explained.

The Initial Task Briefing is not complete until the M.A.R.S. Europe person leading the briefing is satisfied that everyone involved clearly understands the work to be

carried out and what their responsibilities and tasks are to ensure that the work is safely completed.

At the completion of the Initial Task Briefing all personnel in attendance must sign a record sheet to confirm both their attendance and their understanding of the content of the briefing.

If the activities cannot be carried out as per the documented methodologies or drawings, or there is a better, safer way to perform the activity, the work will stop, and the Management of Change Procedure consulted and followed. Work will only commence again once the approvals are given, and a new Initial Task Briefing is given and adhered to.

8.5.4 Q.H.S.S.E. Meetings

Additional to the start work meetings, M.A.R.S. Europe holds weekly and monthly Q.H.S.S.E. meetings (Operational and Management meeting) to discuss all kinds of related topics such as incidents, preventive measures, operations planning, results of audits etc. According to client specifications, M.A.R.S. Europe will adapt increase the frequency of these meetings. Additional to this, M.A.R.S. Europe will participate in client H.S.S.E. meetings and briefings.

8.5.5 Management Review Meeting

A management review meeting should be organized at least once a month, in which H.S.S.E. inputs are discussed i.e. incident/accident statistics, audit findings and follow-up of corrective actions, status of ISO implementation, if applicable and etc). Relevant Management Review report will be completed and shared based on distribution list. It is the responsibility of the Project Management to organize and follow up the actions of this Management Reviews. H.S.S.E. Manager must participate in this meeting.

8.5.6 Project specific meetings (Work packages, HAZID, HAZOP)

M.A.R.S Management and Operations will hold Project-specific meetings. Before starting operation on each work package, a meeting will be planned, covering all processes from work package, lifting points, cutting points, engineering lifting, hazards, and risks management for the work package.

An initial HAZID meeting is planned to identify all hazards associated with the demolition process involving the H.S.S.E., OHS representatives, Engineering, Operation department involved and Project Management departments. A final report will be issued to the client and updated during the project development if changes appear in the process, activities, or equipment. A HAZID action tracker will be attached to the report and document further clarification or engineering controls until they are closed.

A HAZOP meeting will be held prior each disposal process and the report will be issued to the client, together with relevant documents.

8.6 Project digitalization

M.A.R.S Europe implemented during company development digital solution to ensure efficiency and safe operations. Evovia.dk, Optimoor and Mellora systems are external

software acquired and implemented in Management System and will be used during Fluminense project. Evovia.dk is used in HR department, Optimoor is used for mooring plans and Mellora is used for risk assessment, observation cards, incident reports, checklist, safety inductions, safety tour reports, document centre, info centre.

Inhouse soft / tools were developed to ease maintenance process (Microsoft access data base) or permit to work system (Permit to work register).

M.A.R.S Europe is always assessing the market and looking in new solutions which will increase efficiency and productivity.

9 Compliance and assurance plan

9.1 Workplace inspection on site

Workplace inspections (WPI) are internal audits executed by a PM, SM, site supervisor, group leader or a member of the safety department. The goal of the WPI is to check whether the correct documents are on site, communication is running good, efficient leadership on site, operational safety issues, in relation with the M.A.R.S. Europe and client requirements Refer to [12] and Annex 7 for Workplace Inspection Report form. Workplace Inspection shall be performed once a week and completed report shall be submitted to H.S.S.E. Department, which will analyse the workplace inspection reports and note the findings together with the corrective or preventive measures. A checklist was developed in “Mellora” for permit to work inspection on site. Internal auditing

Detailed comprehensive audits will be undertaken by the M.A.R.S. Europe EQ / H.S.S.E. Managers during the project to ensure compliance against the Quality, Environmental Management and Health and Safety Plans for M.A.R.S. Europe personnel and their contractors. A specific Fluminense audit plan will be developed by M.A.R.S. Europe. Fluminense Quality plan present in detail how the audits are planned and monitored.

9.2 H.S.S.E. compliance

Site H.S.S.E. manager is responsible to perform the internal auditing on compliance with Decommissioning and Dismantling project procedures. Record of audits together with findings will be kept on site for Project review. An internal audit plan is followed by M.A.R.S Management. (IMS-PLN-600).

9.3 Subcontractor management

All M.A.R.S Europe subcontractors performing operations on site are working under M.A.R.S Europe management system and under current H.S.S.E Plan. Subcontractor procedures are reviewed by E.H.S department and bridge towards M.A.R.S Europe system. Training is provided by E.H.S Department to all subcontractors, such as safety induction, permit to work system, risk assessment, H.S.E checklists, toolbox talk, SIMOPS, and other trainings as per needs.

9.4 Inspection of work equipment

9.4.1 Rigging Gear Inspection Requirements

LAG Equipment: Slings (wire rope, chain, soft slings, nylon sling, webbing slings), shackles, chains, chain falls, come-a-longs, snatch blocks, hooks, tuggers, lift bags and rigging, and other lifting accessories).

LAG equipment Inspection:

- All rigging equipment will be subject to a mandatory annually inspection conducted by a third-party contractor.
- Rigging and lifting equipment will undergo an internal, quarterly inspection and be colour coded. Internal inspection to be one by a qualified person (M.A.R.S Employee). The quarterly inspection is not intended to replace the mandatory annually inspection by a third-party contractor.
- Equipment should be visually inspected at handout and when returned to rigging loft. To be inspected for wear and tear, damages and confirmed to be correct colour coded. If the item does not fulfil requirements, it will be put in quarantine until re-certification / re-inspection or destruction.
- Equipment found on decommissioning assets will be put in quarantine and can be re-certified by a third-party contractor or destroyed. Items that will not be used for lifting operations will be coloured red and only used for pulling operations.
- All equipment certificates are stored at Site Supervisors office in a hard copy and in the M.A.R.S Certificate Bank.

Inspection of work equipment is described in detail in Crane & Rigging Inspection and Colour Coding (LAG) (EHS-WIN-410) [13].

9.4.2 Equipment / Tools Inspections

All equipment and PPE must be visually inspected prior to every use by the user him/herself. Designated employee for handing / receiving equipment's /tools/ lifting equipment was implemented by M.A.R.S Europe. According to his job description, he is responsible to check all equipment/ tools and quarantine the equipment/tools if defect is observed.

9.4.3 Inspection of major equipment

All service points on machinery will be logged in M.A.R.S' Planned Maintenance System as per listed in the machine manufacturers service manual. (Planned Maintenance System - *Microsoft Access database developed in house. Holds a list with all machinery on site that M.A.R.S is responsible for maintaining.*)

Each machine service points are logged in the database and will give an indication when attention is required on basis of machine running hours or last done date. Machine service points are fed into the database as per service manual for each machine. Under the service points maintenance history and actions are recorded to keep track of actions and documents related to service point.

All yearly inspection sheets, CE Approval and other relevant documents are attached to the individual machine and can be viewed in the database.

Inspections and Maintenance

Daily visual inspections:

The machine operator must make daily visual inspections and fill the checklist. The checklist is delivered to Site Foreman and kept on site. Only running hours filled into the daily checklist are forwarded to Site Engineer. Running hours to be logged in PMS and Weekly Running Hours sheet.

Maintenance:

The Maintenance team consists of trained welders, trained mechanics, and trained electricians. The maintenance conduct maintenance checks of machines and is responsible for conducting service and repairment when needed. Third-party company can be hired to some maintenance tasks.

Weekly logged operating hours on machinery serve as the basis for when maintenance checks are to be performed. Next week's checks will be planned accordingly, depending on running hours logged on Fridays.

Maintenance Team receives instructions from Site Engineer on the machines and equipment that needs maintenance checks.

10 Operational safety

10.1 Security

M.A.R.S Europe is an ISPS facility (International Ship and Port Facility Security Code). A risk assessment was conducted for security breaches by H.S.S.E. Department, assessing potential hazards and mitigating them, implementing solution for a secure workplace. (Controlled access, site guards - 2 shifts, register all employees, visitors, contractors entering the yard, CCTV and alarm system installed on the site.)

10.2 Make Safe Process

The "Make safe" process represents the first operation to be done on an area to allow employees to have a safe work environment. A pre-make safe will be done by a qualified team (such as H.S.S.E. Department, Site Manager, Project Manager, Cleaning Team Supervisor), assessing the area's risk/hazards/hazardous materials. (If a level 2 mapping report exists, it will be consulted before pre-make safe.) After the pre-make safe inspection completion, a "make safe" plan will be developed and discussed with all parties involved. Ventilation, lights installing, housekeeping for loose objects/ dropped objects, safety signs, hazmat mapping and marking, firefighting equipment, first aid, and escape routes. All operations will be done under the permit to work system, with risk assessment and toolbox talk. A "make safe" checklist will be filled up, certifying that the process was completed, with evidence from before/after the process. All employees involved in this process are qualified, certified, and experienced. Hazardous materials will be removed (if present) as per SDS sheets and by competent persons. Chemical risk assessment is mandatory for this task. Hazmat points from hazmat mapping will be clearly marked by designated person and a label tag will be used (contact details, type of hazard). All persons involved in hazmat mapping, cleaning is qualified and trained, ready to recognize all the hazards and find solutions to mitigate, such as asbestos.

10.3 Welding and flame cutting

Many hazards are associated with welding and cutting, but as in other operations they can be controlled by appropriate preventative measures. Unless these control measures are taken, the hazardous situations can easily give rise to personal injury and /or material damage.

At all locations where hot work produces an ignition source capable of igniting gas-air mixtures, vapours or other flammable materials, a written Hot Work Permit shall be obtained prior to commencing the work.

Procedure for welding and flame cutting [22] operations (EHS-PRO-301), which provide appropriate safeguards for the health of the worker, is therefore essential and applied for all relevant operations. Drill and sniff in pipes are part of standard procedure in M.A.R.S Europe. All pipes which are cleaned and drained are marked with green colour, meaning that is ready to be removed. Gas detectors are always used in environment which can occur presence of hazardous gases. (Pipes, tanks, equipment). Barriers management is preventing the exposure of other personnel around the cutting process.

10.4 Confined Space

Confined Space procedure (EHS-PRO324) [9] will apply to all M.A.R.S. Europe controlled work sites, facilities, and vessels, both offshore and land-based where entry into a confined space is necessary. This Procedure applies to all M.A.R.S. Europe employees and locations worldwide. **This procedure does not apply** when work is being performed on a M.A.R.S. Europe facility or vessel, by a third-party contractor or shipyard, that has in place **a confined space procedure that has been reviewed and approved by M.A.R.S. Europe management**. M.A.R.S. Europe personnel are still required to approve confined space entry permits on a M.A.R.S. Europe facility or vessel issued by third parties and shipyards.

Throughout the entire recycling process, M.A.R.S. Europe will ensure that, prior to entry and during work, enclosed spaces, and other areas where the atmosphere is dangerous are monitored to ensure that they remain Safe-for-Entry and safe for continued activity. The M.A.R.S. Europe shall ensure that shipboard spaces are not entered until a Safe-for-Entry certificate has been issued by a Competent person.

10.5 Work at height

Working at height procedure [11] (EHS-PRO-327) aim of establishing minimum fall protection requirements for personnel working where a fall hazard exists. It further aims to provide maximum prevention and protection against falls and dropped objects.

It is mandatory that anyone 2 meters (6 feet) or more above a working surface or within 2 meters (6 feet) of a leading edge shall use a fall protection system 100% of the time. Work conducted less than 2 meters (6 feet) above a working surface, where there is a high probability of injury from a fall, should consider fall protection. When working on slippery areas at heights under 2 meters (6 feet) e.g., areas covered with ice, snow, or marine growth, it is mandatory to use a fall protection system. All tasks requiring an employee to work at a height of 2 meters (6 feet) above a surface or within 2 meters (6 feet) of a leading edge not protected by handrails or working over water

not protected by handrails shall obtain a “Cold Work Permit”. Hard barrier will be established by scaffold department if the leading edge is less than 2 meters from an access area/walk area.

10.6 Dropped Object

Drop objects are covered by Prevention of Dropped Objects EHS-PRO-381[47] and is an important process from Make Safe operation. Preventive campaigns and drop object training are performed by H.S.S.E. department to raise the awareness and improve employee’s safety culture.

After pre-Make Safe, all areas which present risk of dropped objects will be clearly marked, and a plan to address the prevention will be implemented together with a risk assessment. (Covering and securing all openings in decks, toe boards installation, housekeeping for loose objects, barriers management, access tunnel covered for drop object preventions, tool register aloft is part of the prevention process for drop objects, risk register for drop object.)

DROPS Calculator is used to developing the risk assessment stage, raise awareness, and implement prevention control and barrier management. No entry and restricted access zone will be clearly marked and managed after the risk assessment was conducted, until the area will become free of drop objects. Dropped object incident rate will be monitor by H.S.S.E. statistics and presented to the client.

Drop object awareness training is provided at the initial stage to all employees involved in Fluminense projects, presenting the drop object risk register and pictures from the areas before the make-safe process. All trainings are recorded in the company training matrix.

DROPS inspection will be conducted regularly on Fluminense to find drop object hazards and the potential exposure of the employees. Each employee is encouraged to look and observe the work area before starting any operations and stop the work until the hazards are mitigated.

Work at height checklist is provided with a tool register log, sign in / off all the tools used for the operation.

10.7 Barrier management

Barrier management is part of the “Make Safe” process and daily operations through a permit-to-work system. The barrier management log records all the barriers installed on M.A.R.S. yard and is part of H.S.S.E. supervisor duties.

Once potential hazards have been identified and assessed, the necessary barrier functions and components must be identified, and the implementation process will start. Barriers management is also evaluated in the early design stages of decommissioning process by the engineering department. Barrier management is a fundamental condition for safe operations and M.A.R.S monitors barrier performance. H.S.S.E. department followed up and improved from the entire lifecycle. After the barriers were physically installed, a label will be attached to the area, with information about the barrier owner, contact details, phone number, radio channel, barrier area details, and validity period of the barrier. For lifting operations, a watchman will be outside of the barriers to monitor the process until completion. The

watchman will wear a marked vest to be always visible. During the implantation of the barrier's vulnerability and barrier, performance will be assessed/ tested by the H.S.S.E. department. Barrier removals represent an essential step of the process, and at the closure of the permit to work system, the barrier is signed off in the barrier management log.

10.8 Scaffold and ladders

M.A.R.S Europe implemented a procedure for Scaffold and Ladder Safety (EHS-PRO-332) [30].

Scaffolds

All temporary walkways / platforms shall be equipped with solid decking that is free of openings and has an approved guardrail system in place, unless in the opinion of the Site Manager and H.S.S.E. Manager these components create a greater hazard. This must be covered in a Management of Change document. All temporary platforms (i.e., scaffolding) must meet or exceed the current standards for temporary work platforms. They must also be built by a qualified person and approved by a designated Competent Person and inspected daily. Personnel involved in erecting, altering, or dismantling scaffolding, must be qualified for such operation and be supervised by a Competent Person which is designated in writing. Completed inspection tag will be attached to the scaffold at the access point for personnel review. At no time shall personnel access a scaffold that is not tagged. Any scaffold over 3 m (10 feet) or 2 sections high must be secured to an adjacent structure. If this is not possible, guy wires or outriggers must be considered. Only qualified employees can erect /modify scaffolds. The procedure is following national legal requirements, which is having at the base EU scaffolding legal requirements standards.

Ladders

Falls from portable ladders (step, straight, combination and extension) are one of the leading causes of occupational fatalities and injuries.

All movable/temporary ladders at an asset or facility are to be inspected monthly and logged on a Ladder Inspection Form, EHS-FRM-519. Complete permanent caged ladders that are being used to access a complete permanent structure do not require the use of a safety harness and lanyards if there are no other fall potentials. These ladders must be inspected during workplace inspections and Hazard Hunts. The use of the ladder must be covered in the pre-job safety meeting, Toolbox Talk, and JSA. All ladders shall be secured to prevent movement. Personnel ascending ladders that are not yet secured at the top must have another employee hold the ladder at the bottom until it can be properly secured. This also includes the last trip down after untying the ladder at the top. A designated watchman will be always present when working with ladders.

Scaffold and ladder inspection work instruction EHS-WIN-408 [51] was developed by M.A.R.S. Europe to assist in the elimination of accidents and injuries because of faulty or defective equipment.

10.9 SIMOPS

Simultaneous Operations (SIMOPS) is defined as all concurrent activities occurring within the project that have the potential for more than general work planning and permitting interaction requiring:

1. Consideration of the work interfaces
2. Participation of all groups involved with the work interfaces in planning and communication
3. Risk assessment of the work task and subsequent risk assessment of the interaction with other work tasks

Simultaneous Operations are controlled under the Project Management System (MS) and involve a structured approach to all work activities which occur within the project and ensure a coordinated safe and efficient work program communicated to all personnel and organizations that are directly involved or potentially impacted.'

SIMOPS may involve:

- Lifting Operations
- Hot Work Operations
- Confined Space Entry
- Installation
- Construction
- Vessel Move
- Vehicle Move
- Pressure Testing
- Leak Testing
- Offloading
- Cargo Tank Inspection
- Shears operations
- Team working adjacent to or over and under each other

SIMOPS procedures (EHS-PRO-320) [34] covers preliminary analysis of SIMOPS for the project. This document shall be developed further during detailed planning and engineering. A HAZID/HIRA shall be carried out to develop the SIMOPS Manual/Matrix and to identify the associated hazards. SIMOPS operations will be performed under permit to work system, toolbox talk, LMRA, and planning of operations meetings, with approval of site managers.

10.10 Manual Handling

Avoid lifting heavy objects. Before lifting, always take a moment to look at the load and assess the weight and possible ways to lift it and look at the underground and the route you need to travel. Try to remove any trip hazards or obstacles. Use lifting aids when available (e.g., cart, forklift). Try not to reach too far for lifting an object and avoid lifting over obstacles. Additionally, make sure that you never use chairs, boxes, or other unstable devices to stand on.

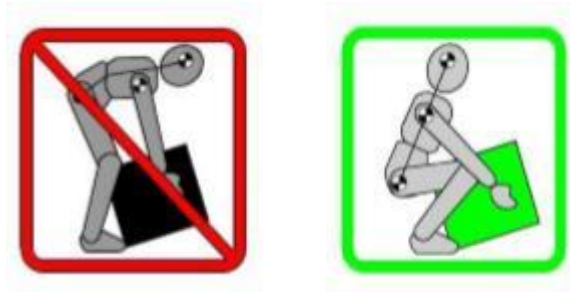


Figure 4 Lifting of heavy objects

When lifting:

Try to stand right in front of the load and as closely to it as you can.

- Keep both feet flat on the ground, positioned left and right of the object.
- Bend the knees and keep your back straight.
- Take a firm hold of the object.
- Take a deep breath; this will help to further support your spine.
- Start lifting gradually using your legs.
- Hold the load close to your body while lifting.
- Don't twist or turn your back while lifting.
- Don't attempt to lift above your shoulders or your head.

When setting the object down, again: use your legs and keep your back straight.

10.11 Noise and vibration

It is important to minimize any adverse effects of noise (occupational noise-induced hearing loss or NIHL) and vibration resulting from dismantling activities.

- Personnel will be made aware of the risks relating to noise and vibrations.
- Noisy equipment will be located as far as practicable from workers.
- All vehicles and equipment will be turned off when not in use.
- Regular maintenance of vehicles and equipment will be conducted to ensure they are kept in good working order.
- Hearing protection shall be worn when ≥ 85 dB (A) at 1-meter distance.

The following limits as shown on Table below for vibrations (standard 8h reference) are applicable:

Table 13 Exposure limits to vibration

	Daily exposure limit	Daily action value
Hand-arm vibrations	5 m/s ²	2.5 m/s ²
Whole body vibrations	1.15 m/s ²	0.5 m/s ²

Detailed description of the noise/vibration testing is provided in form [27].

10.12 Leaks, spill, and soil contamination

Leak, spills, and soil contamination procedures are detailed described in Hazardous Material Response [20]. The following procedures identify the clean-up and control measures to be utilized event of a spill of oil, fuel and a hazardous substance during a project.

RESPOND ONLY TO THE LEVEL OF YOUR TRAINING

If a spill or release cannot be stopped or contained immediately by one-person, alert other crew members before starting to respond to a spill or release. This will ensure that help is being mobilized if the spill or release increases or gets beyond the control of a single person.

Spill Kits

A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials.

A typical spill kit aboard a ship or barge should contain as a minimum the following:

- 10 sections sorbent boom.
- 5 oil pillows or socks.
- 20 sorbent pads.
- large size, 6 mil, polyethylene bags.
- pair latex gloves.
- 1 temporary storage drum (Overpack drum).

Oil/Fuel Spills

- Small spills and leaks must be stopped and cleaned-up as soon as feasible.
- Use adsorbent pads wherever possible to reduce the number of contaminated articles.
- Restrict the spill by stopping or diverting flow to the oil/fuel tank or collection container.
- If the release exceeds the containment system capacity, immediately construct additional containment using available suitable material. Every effort must be made to prevent the seepage of oil into the waterways.
- If a release occurs into a waterway, immediately follow spill response plan in [20]. Try to absorb any floating layer using absorbent pads and/or deploy an oil boom if sea conditions permit.

If possible, pump or skim any floating oil into a suitable holding tank or container.

- After all recoverable oil has been collected and drummed, place contaminated absorbent pads, booms, and/or articles in containers.

- For larger quantities of contaminated material, construct a temporary waste containment area using plastic liners placing the contaminated material on top of the plastic and covered by plastic. Plastic-lined roll-off bins or skips should be leased for storing this material as soon as feasible.
- Label the drum following the procedures outlined in the Company's Waste Management Plan. Move drum to secure staging or storage area.
- Document and report activities to the Site Manager or Project Manager and H.S.S.E. department as soon as possible.

Hazardous Substance Releases

- Identify the material and quantity released.
- Block off drains and containment areas to limit the extent of the spill.
- Never wash down a spill with water.
- Ensure that Personal Protective Equipment and containers are compatible with the substance.
- Collect and reclaim as much of the spill as possible using absorbent pads, a hand pump or similar device.
- Containerize contaminated material in appropriate waste container.
- Never place incompatible materials in the same drum.
- Sample the substance for analysis and waste profiling, according to instructions from the H.S.S.E. department.
- Decontaminate all equipment in a contained area.
- Collect and containerize decontamination fluids.
- Label the drum following the procedures outlined by H.S.S.E. department or Waste Procedures.
- Move the drum to secure staging or storage area.
- Document and report activities to the Site Manager or Project Manager and H.S.S.E. department as soon as possible.

10.13 Weather Condition

General

Temperature, humidity, and radiance from the sun all affect the level of physical comfort and stress a person may experience. Heat poses hazards to the safety and health of personnel, such as dehydration, sunburn, fatigue, decreased concentration, and objects can slip from sweaty hands. These risks must be always avoided.

- Take sufficient breaks and work in the shade whenever possible.
- Make use of tools as much as possible.
- Drink enough! Drink at regular intervals and make sure the loss of water and salts is countered quickly.
- Limit the entry or generation of hot air into the offices and work areas and

ensure adequate ventilation.

Cold Environments:

M.A.R.S. Europe yard, localized in the Port of Frederikshavn, is not exposed to extremely low temperatures. Anyway, it is important that the hazards and risks associated with the cold environment are well understood and counteracted.

- Extra attention to weather conditions & forecasts (wind speed, heavy fog).
- Extra caution on site roads and when working on heights (ice, snow, slippery surfaces).

Adequate lighting on site and during working in the dusk or times of poor light (when required).

Exposure to extreme cold may cause frostbite or hypothermia:

- “Frostbite” is freezing damage done to local tissues. It may be superficial or deep. Superficial frostbite usually affects the outer layer of skin. Skin may seem white, waxy, and firm to the touch, but tissues underneath is soft. Casualty may complain of pain followed by numbness in affected area.
- Deep frostbite is much more serious, usually involving an entire hand, foot, etc. and affects the tissues beneath the outer layer of skin. Skin may seem white, waxy, and becoming almost greyish blue as it worsens, turning cold and hard. Casualty may complain of lack of feeling in affected area. Deep or severe frostbite can lead to infection and possible loss of extremities. Individuals with history of past frostbite tend to be more susceptible to re- injury.
- Hypothermia is a generalized cooling of the body, usually developing from exposure to abnormally low temperatures over an extended period or contact with cold water, which drains body heat rapidly. Hypothermia may be mistaken for drunkenness, stroke, or drug abuse, as the casualty may seem disoriented, irrational, sleepy, with slurred speech, and shivering. Casualty may lose consciousness and coma, or death is possible if not treated.

Risk of frostbite or hypothermia is increased with:

- Low temperatures combined with strong winds (called wind-chill).
- Person is weakened because of lack of food, fatigue or using alcohol, Tabaco, or drugs.
- Wet clothing from sweating or immersion in water.

To prevent cold injuries:

M.A.R.S. Europe provide all employees with a winter pack of clothing and advice.

- Prepare for poor weather - take extra clothing when working outside.
- Stay warm - wear several layers of loose-fitting clothing that breathes. Wear gloves. Wear CSA approved steel toed, insulated footwear with suitable soles, winter boot. Use extra socks if possible (Note: use extra care and caution around operating equipment when wearing bulky clothing).
- Stay dry - avoid getting wet. Outer clothing layer should be wind or water

resistant, yet in compliance with site clothing standards. (Fire Retardant Coveralls).

- Use hard hat liner and balaclava-style face protection (loose or hanging scarves are not allowed).
- Eat well - eat high-energy foods, often, at regular intervals.
- Stay hydrated - hot, sweet drinks are best, but water is fine if nothing else is available.
- Stay safe - limit the time spent in the cold; frequent breaks in a warm, sheltered area may be warranted. Work in pairs so that co-workers can monitor each other for signs of fatigue/injury.
- Avoid fatigue - rest periodically in sheltered areas.
- Remove heavy outer clothing when indoors to reduce sweating, which can increase body cooling problems upon returning to the outdoors.
- Avoid use of alcohol, tobacco, or drugs - these add to heat loss and affect a person's thinking abilities.
- Use/erect wind breaks or hoarding, where practical.
- Winter coveralls.

First Aid for Superficial Frostbite:

- Prevent further heat loss.
- Re-warm affected part gradually with body heat.
- Do not apply direct heat.
- Do not rub or put snow on affected area.

First Aid for Deep Frostbite:

- Treat frozen part gently to avoid further tissue damage.
- Prevent further heat loss.
- Do not rub or put snow on affected area.
- Do not allow casualty to move needlessly.
- Thaw frozen part gradually if: medical help is not available, casualty is in a warm environment, and there is no immediate danger of refreezing. To do so, remove clothing gently from affected area, warm the affected part using warm water (approx. 40°C) until colour no longer improves. Hotter water must not be used, as it will cause extreme pain and possible further injury.
- Obtain medical aid if sensation or feeling does not return to affected area.

First Aid for Hypothermia:

- Handle casualty gently with least possible movement.
- Remove casualty to warm shelter.

- Re-warm casualty with blankets, coats etc., and remove wet clothing as needed.
- Give conscious casualty something warm and sweet to drink.
Monitor casualty and seek medical attention as needed.

If a person is found unconscious in a frozen state, call for immediate medical help so that re-warming may take place under controlled conditions.

10.14 Housekeeping

To work safe on site, order and cleanliness is crucial. Below are some instructions on how to accomplish this:

At the Workplace:

- Clean up the workspace at the end of the day.
- Throw waste in correct container (according to site / national regulations).
- Make sure that the machinery is neat as well from the inside as from the outside.
- Store equipment and tool each time after the execution of a task, do not leave them on site when they are not used.
- In case of problems report this to the person in charge.

In the Containers, Canteen, Sanitary Facilities, Changing Rooms:

- Wash your hands before eating.
- Eat only in rooms that are approved to eat in (canteen).
- Do not leave any leftovers after the break.
- Change dirty clothes in time and on regular basis.
- Keep the changing rooms and lockers hygienic.
- Dispose of waste in correct container (according to site / national regulations).

In case of problems report this to the person in charge.

10.15 Lifting and rigging operation

Crane and rigging procedure (EHS-PRO-334) [15] is to provide crane operators and associated personnel, both shore-based and on vessels, with clear safe guidelines for operating cranes, winches, and other lifting equipment. It is a starting point from which all personnel can develop an understanding and achieve a uniform standard within the company for proper LAG (Lifting Appliances and Gear) procedures.

The Crane Operator will be properly trained, certified, and authorized to operate the equipment he is assigned to. The Crane Operator is responsible for the safe operation of the crane. He is in overall control of the crane and its functions but must rely on guidance from the Riggers. The Crane Operator is responsible for checking the equipment before use. The Crane Operator must be aware of all applicable safety

precautions and instructions prior to and during crane operations. He must understand all signals used by the Riggers. Radio communication is used at all times between logistic department, with designated radio channel, so the communication will not be interfered by other operations. He has the authority to suspend lifting operations when a situation arises, or a condition exists, where in his opinion the safety of personnel, plant or equipment may be jeopardized.

All Riggers and Signalman (Banksman) will be properly trained for the task assigned. It is the Rigger's responsibility (either Signalman or Rigger) to conduct a visual inspection prior to use of all lifting equipment associated with the lifting operation for any signs of corrosion, damage, or misapplication. This visual inspection is critical to ensure that the lift can be done safely.

All employees have the responsibility to call an "All Stop" to lifting operations when a situation arises, or a condition exists, where in their opinion, the safety of personnel, plant or equipment may be in jeopardy. Care must be exercised so that when stopping the operation, it will not increase the risk to personnel.

10.15.1 General Requirements for Safe Lifting and Rigging Operations

- A Hazard Analysis shall be performed to identify all hazards associated with lifting and rigging operations and mitigations.
- Lifting and rigging devices and attachments shall be used in accordance with the intended design purposes and specified limits of the manufacturer as well as safe work practices.
- No one shall be permitted to operate any lifting equipment unless they are trained and qualified by a competent person in the use and operation of the equipment.
- Ensures that the area, in which the hoisting movement and the lift path takes place, will be clearly fenced off with appropriate material. No subcontractors or client representatives may enter the "lift exclusion zone" without specific authorization of the M.A.R.S. Europe lifting supervisor or M.A.R.S. Europe site supervisor.
- Confirm weight of the load (in accordance with documentation, calculations) and establish the load's centre of gravity prior to beginning the lifting operation.
- Establish clear pick-up and lay-down areas that are within the crane's load lifting radius prior to starting the lift.
- Ensure the load path from the beginning of the lift to the lay-down area is clear of obstructions.
- When a load is moved horizontally, it must be kept at least 0.5 meters above the objects that it passes over.
- The distance between moving parts of a crane and nearest building, structure, or another load shall be not less than 1 m.
- Personnel shall not be allowed in the truck hold, cabin or gondola wagons during crane assisted loading/unloading thereof.
- Stationary racks or overhead platforms shall be arranged on permanent truck/gondola loading/unloading stations.
- Riggers may stay close to the load being hoisted or lowered if the hoisting height does not exceed 1m above the ground level.
- Gloves must be always worn when handling and using a tag line.

- Workers must never ride on a load being hoisted.
- Barricades shall be established around lifting operations to prevent unauthorized entry and lifting operations shall be stopped if any non-essential personnel enter the barricaded area.
- Workers must not stand or pass under a suspended load.
- All rigging and lifting arrangements shall be done in compliance with M.A.R.S. Europe instruction.
- Person in Charge will be the responsible for the lifting operations, being a person within the specific lift team, and it will lead the specific lift operations. (From normal to critical lifts).
- Designated appointed persons (lifting supervisor / site manager) is approving the critical lift before operations starts. The critical lift checklist will be completed and signed, confirming that the operation, rigging equipment and rigging points, documentation is according to the plan.

10.15.2 Risk Associated with Lifting Operations

The hazards: associated with the use of lifting equipment are:

- Hazards related to the loads, e.g. crushing due to impact of moving objects or loads falling from vehicles because they are not slinged properly or the wrong type of slings were used.
- Hazards from moving vehicles or collapsing structures, i.e. cranes falling over because of improper fixation or strong wind, unsafe loads, loads exceeding the safe weight limits, trapping/crushing risk in the use of mobile elevating work platforms (MEWPs) while working at height, falling from height, limbs or bodies caught in machinery.
- Falling from lifting platforms or being crushed when the platform moves.
- Being crushed under the falling cargo.
- Contact with overhead electrical cables.

Possible causes of these hazards: poor mechanical design (breaks in use, not powerful enough, components fracture or malfunction), poor workplace design, malfunction of the (manual, mechanical, electronic) signalling system, not using the proper equipment for the purpose or misuse (not using as designed, e.g. the load was too heavy), loads insecurely attached, poor maintenance (breaks or emits noxious gases) or untidy workplace, human error when operating machines, the lifted load not completely free from the main structure or gets caught up during the lift.

10.16 Stored energy

Stored energy in decommissioned structures can be very difficult particularly in steel structural members. Cutting, or removing structural members, hydraulic systems, residuals materials in pipes, residual powers sources, are some of the hazards found during decommission process. M.A.R.S Europe are instructed and trained to recognise the potential stored energy hazards. Risk assessment and toolbox talk are the primary tools to controlled stored energy, plus the operational controlling measures on location. Special chapter regarding stored energy can be found in M.A.R.S Europe Safety booklet. Stored Energy Awareness EHS-WIN-410 [48] was created by E.H.S

department to increase the employee's safety culture. In these methods of safe controlling/ releasing stored energy are exemplified, such as pipes drill & sniff.

10.17 Asbestos awareness

Asbestos procedure (EHS-PRO-329) [35] is to provide and maintain safe, healthy working conditions, safe equipment, and safe work procedures for all employees in accordance with the company's initiative of an Incident and Injury Free Workplace. The purpose of this standard is to establish guidelines and procedures about asbestos containing materials and to protect all employees, contractors, visitors, and suppliers from potential health hazards of asbestos related diseases.

This procedure will apply to all buildings, vessels, and barges at the M.A.R.S. Europe yard, to all employees and subcontractors, and to occupants of Company buildings and to external organizations that may come into contact with or disturb asbestos-containing material. It applies to routine work during which an employee might encounter asbestos, as well as work undertaken to repair or remove asbestos-containing material.

When working with asbestos and materials that contain asbestos, dust is created that contains fine, needle-like fibres. At the maximum safety limits set, the dust cannot be seen with the naked eye. Because of the structure of asbestos, the fibres can constantly split along their length, ultimately becoming very thin. There is a risk that if inhaled, they can pass all the way down into the most delicate branches of the lungs where they can accumulate. Exposure to asbestos fibre involves the risk of developing asbestosis and various forms of lung and bowel cancer. Asbestos and smoking can amplify the damaging effects of each other, increasing the risk of lung cancer.

All operations regarding the asbestos removal are done by competent persons, and M.A.R.S employees are trained to identify and handle asbestos.

10.18 PCB awareness

M.A.R.S Europe implemented a PCB (polychlorinated biphenyl) procedure (EHS-PRO-385).

10.19 NORM

NORM can occur as scale, sludge or produced water. Current decontamination projects will primarily comprise cleaning of scale, which is hard radioactive deposits on the inside of pipes, tubes, valves and other production equipment from the oil and gas industry. The scale settles on the inside of the equipment during the production of oil. The cleaning of the NORM contaminated objects will be carried out by means of high-pressure water jetting which is carried out inside a specially designed container called a "decontamination unit". Where water is unable to remove the NORM contamination, entrained abrasives may be used in accordance with Working Procedure for Handling of NORM (Naturally Occurring Radioactive Material) (EHS-PRO-372) [36].

10.20 Mercury

The following EHS-PRO-371 [37] procedure is part of an introduction to Mercury and the hazards associated with the exposure to it. This procedure clearly identifies measures to be taken to ensure the safety of personnel who are working where there is a potential for exposure. Mercury is known to occur naturally in crude, condensate,

or gas streams during production operations. Experience has shown that Mercury is present within the process; it has also been present within the Glycol and produced water systems.

Any vessel/platform entry will be carried out in accordance with above procedure. Wherever there is a risk of exposure to Mercury, suitable monitoring should be carried out prior to the job commencing using a Jerome Monitor or other certified Mercury monitoring device. When the exposure level has been recorded the appropriate level of RPE shall be ascertained. During the planning phase of the work scope, it will be clearly identified who will carry out the monitoring offshore. This will be detailed in the work pack. A copy of all measurements and exposure recordings will be passed to/documented by the Supervisor.

Any vessel internals/furniture removed from the vessel shall be double bagged or sheeted and clearly labelled if mercury contaminated and taken to a designated controlled area for decontamination or disposed of as directed by client. A full worksite risk assessment must be carried out and included in the work pack. Where adequate control of exposure cannot be attained by the hierarchy of control, suitable PPE shall be used. The PPE must be appropriate to the work activity identified by the COSHH assessment.

No hot work operations will be allowed on mercury contaminated equipment and piping due to release of mercury vapours into the atmosphere. All cutting operations will proceed after the completion of mercury cleaning process. All cleaned equipment/pipes will be painted with green colour. (Safe for removal/cut).

10.21 COVID 19

The following EHS-PRO-374 [38] is established to ensure that everybody, personnel and third parties, entering the M.A.R.S. Europe site is not infected with the Covid-19 virus. This procedure is following all national guidelines and rules. Applies to all personnel, subcontractors, clients, and third parties entering the M.A.R.S. Europe site, during the Covid-19 pandemic. M.A.R.S Europe has the possibility to make quick blood test to track Covid-19 and certified employees to perform the test. (Site Manager).

10.22 Access to Fluminense

When the engineering department develops suitable access, a HAZID and HAZOP will be performed. During the execution phase, all operations will be under permit to work system and controlled by H.S.S.E. department. Information's about the access will be posted in the near vicinity (weather limit, maximum capacity), and a tally station will be installed (T-card, first aid kit, fire extinguisher, general alarm buttons -one at the quay side, other on the Fluminense). The Tally station will be positioned at the quay side, close to access point. The access will be verified and tested before usage.

A Fluminense T-card will be assigned to all employees/visitors/client's supervisors to track all persons on the asset. The T card will be removed from the tally station at the end of operations. All personnel assigned to the project will get a Fluminense safety induction (access details, escape routes, first aid points, alarms, muster points).

Daily visuals and weekly structural checks will be performed by M.A.R.S. designated person, which will be documented (scaffolds).

In case of adverse weather and the access limit will be reached due to high wind, the area will be barrier off, and all parties informed. The weather forecast, wind anemometers, and Port of Frederikshavn weather data will be used to assess the weather.

10.23 Marine growth (Biofouling)

Marine growth removal methods will be covered by HAZID, HAZOP, work package and the permit to work system. Further information's will be presented when the removal method will be selected.

10.24 Ballast/deballast operations

Ballast / deballast operations will be covered by HAZID, HAZOP, work package, and the permit to work system. During the offshore survey, M.A.R.S. representatives will familiarize themselves with the ballast system, pumps, and tank status and analyze the best method for this operation. Ballast / deballast operations will be performed only by competent and qualified personnel.

10.25 Offshore survey

M.A.R.S. Europe will assure that all attendants to offshore survey will have all courses and trainings required by company. A HAZID and HAZOP will be developed prior the offshore survey.

During offshore survey, E.H.S department will familiarize with Fluminense layout, focusing on mapping hazards and risk, hazardous materials (SDS), escape routes, firefighting / lifesaving equipment and ballast system (tank status, ballast operations), but not limited to all above.

10.26 Diving Operations

If diving operations will be needed during the operations, M.A.R.S Europe already audited a local diving company, with offshore experience operations. Before the diving operations will start, M.A.R.S will share all data / procedures available with the client for approval.

10.27 Readiness review

Readiness review is part of M.A.R.S Europe management system. Prior to start main operations, readiness review checklists are developed according to the operations scope. Readiness review will focus, but not limited to resources, facilities, organizations, materials, tools, HAZID, HAZOP. All items from readiness review will be closed, prior the operations will be performed. A planned meeting is performed, where all aspects are monitored / checked from readiness review checklist with all parties

11 Environmental Protection Plan

11.1 Site Environmental Plan

Site Environmental Plan will address environmental measures to mitigate impact to the environment applied to meet Denmark legislation and M.A.R.S. Europe requirements on dismantling project. Details are described in [2] [19][24].

Site Environmental Plan will be consistent with M.A.R.S. Europe Management System covering all relevant site-specific environmental aspects of the project.

Any degradation of environmental assets is prohibited and will be considered a violation of the environmental specifications of the project.

Environmental degradation considered:

- Enter on foot or by vehicle in a prohibited area, protected or sensitive.
- Cause a fire in a wooded area.
- Deface in any manner whatsoever equipment environmental protection (silt barrier, control basin, skimmer, signalling a sensitive area, decontamination kits, etc.).
- Capture, injure or kill any animal whatsoever (including fish and coral).
- Picking fruits or seeds of native plants without authorization.
- Manage inappropriately solid and liquid waste (dumping garbage to illegal area).
- Disturbing the soil without authorization (without a work permit / mining) or without safeguards/mitigation have been implemented.
- Leaks of hazardous chemical products.
- Washing equipment and/or vehicles out of washing area.
- No respect of waste selection.

11.2 Waste removal

Waste management and removal is described in Waste & Material Management Plan [19].

Removal of hazardous waste:

The removal and cleaning of hazardous waste and materials will be performed by skilled and experienced workers with the necessary training and certificates. All removal and cleaning will be carried out according to all applicable laws. Description of handling of specified hazardous materials is attached in [19].

As soon as there is any hazardous waste from decommissioning/cleaning it will be packed according to ADR regulations before it will be removed from the sealed area. Everything will be safely packed so that it is ready to be transported on the roads outside the area. Some fractions will be transported directly to final disposal. Some fractions will be stored temporarily in a warehouse or secure location at the facility.

Minor storage of hazardous waste in the warehouse:

The different waste fractions will get its own designated, well-marked area. The signs set up ensure acids and bases are divided, there will be no mixing of different waste fractions (both liquid and solids) and safe handling when stored and picked up for transportation.

Waste generated at Facility:

Besides the waste generated by the decommissions process there will be waste generated at the facility from the support operations and processes e.g. office, crew/staff facilities and warehouse.

Storage and handling of reusable and recyclable materials:

Materials for recycling either waste or metals, woods etc. will be handled according to waste plan and environmental approval.

Recyclable materials are sub-fractioned and stored on hinterland areas until collection and transportation can take place.

Metals and other materials will predominantly be transported from site via ship, hence lifted to ships moored by docks. Some fractions, possibly smaller fractions of non-alloy steel fractions, could, however, also leave the site by road transportation.

Transport to final disposal

Transport of hazardous waste will be done according to ADR regulations. See EHS-PRO-304 Dangerous Goods Hazardous / Materials Transportation [17].

Only authorized transporters and facilities are used.[19].

11.3 Hazardous substances

Reference to [20].

11.3.1 Storage

Hazardous Materials will be stored according to the manufacture's requirements detailed on the SDS. Chemical and hazardous substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals and hazardous materials should be kept in closed containers and stored so they are not exposed to the environment conditions or the possibility of contaminating the ground or storm water. All chemical and hazardous materials containers will be properly labelled. Labels must be in good condition, readable, and visible. A guideline for the storage of container, tanks, and cylinders is listed below.

Containers

- All containers should be stored in such a way that they are surrounded by a containment barrier. Small cans of gasoline, diesel, solvents, etc., should be stored within a containment area when not in use.
- No incompatible materials shall be stored in the same containment area.
- Containment areas for storage of drums should be either fixed or a portable manufactured rack with a containment feature.

- Containment areas should be capable of containing 110% of the volume of material stored in these areas.
- All container storage areas shall be inspected daily for leaks and deterioration.
- Leaking and/or deteriorated containers shall be replaced as soon as the condition is first detected.

Tanks

- Tanks for fuel, oil, and materials storage above ground, will meet the approval the regulating agency.
- All tanks will be constructed with materials compatible with the contents of each tank.
- All above ground tanks and storage areas shall be inspected daily for leaks and deterioration.
- Equipment mounted tanks shall be inspected and equipped with flame/spark arrestors on all vents, as required, to ensure that self-ignition does not occur.
- Tanks will not be used to store incompatible materials in sequence unless first thoroughly decontaminated.

11.3.2 Identification

Consult the SDS or H.S.S.E. Department to determine the hazards of the material being used and proper disposal procedures. See EHS-PRO-302 COSHH [16], EHS-PRO-305 Hazard Communications - Right to Know [18] and EHS-PRO-307 Hazardous Materials Response [20] procedure for more detailed information.

All identified hazardous waste and materials identified during the Hazard Assessment/Walk Through (ship/barge/platform) will be recorded by location, type, and amount. Physical locations on the vessel will be identified by already installed labelling or signage, which will be annotated by the inspector's permanent mark alongside the label, or by permanent labelling by the inspector at the location.

11.3.3 Material Safety Data Sheets (SDS)

Company employees or its representatives shall not accept chemical deliveries without an SDS. This includes chemicals delivered "in house" from company inventory to facilities.

The company representative who initially takes delivery of the chemical shall be responsible for obtaining and forwarding the SDS to the supervisor or person in charge so that it may be filed in the SDS book.

If any information is missing on the SDS, the shipping and receiving coordinator or supervisor must request a revised SDS from the supplier.

The Site Manager shall review all SDS and distribute approved/revised chemical SDS to applicable supervisors.

The site manager is responsible for distribution of SDS to his personnel. The SDS are to be placed in the SDS book or added to the database where applicable.

When material is transported, a copy of the SDS must be transported with the material.

11.3.4 Protection of Users

The requirement for chemical protective clothing and equipment to be used during a response is outlined in [20]. Personnel must be trained in the use of this equipment before use. See EHS-PRO-315 Personal Protective Equipment [23] for details of standard PPE.

11.3.5 Leak Treatment

- Small spills and leaks must be stopped and cleaned-up as soon as feasible.
- Use adsorbent pads wherever possible to reduce the number of contaminated articles.
- Restrict the spill by stopping or diverting flow to the oil/fuel tank or collection container.
- If the release exceeds the containment system capacity, immediately construct additional containment using available suitable material. Every effort must be made to prevent the seepage of oil into the waterways.
- If a release occurs into a waterway, immediately follow spill response plan in [20]. Try to absorb any floating layer using absorbent pads and/or deploy an oil boom if sea conditions permit. If possible, pump or skim any floating oil into a suitable holding tank or container.
- After all recoverable oil has been collected and drummed, place contaminated absorbent pads, booms, and/or articles in containers.
- For larger quantities of contaminated material, construct a temporary waste containment area using plastic liners placing the contaminated material on top of the plastic and covered by plastic. Plastic-lined roll-off bins or skips should be leased for storing this material as soon as feasible.
- Label the drum following the procedures outlined in the Company's Waste Management Plan. Move drum to secure staging or storage area.

Document and report activities to the Site Manager or Project Manager and H.S.S.E. department as soon as possible.

11.4 Dust prevention

Table 14 Dust prevention

Activity		Frequency	Responsibility
Dust nuisance	In periods with risk of dust nuisance that can impact the surroundings relevant site areas must be wetted or humidified.	When at risk	Worksite Manager/ EQ Manager

Dust nuisance Remediation	Surface water will be gathered in on-site tanks. In case of need for wetting, water from tanks may either be sprinkled on surfaces by means of pump, hoses and spray nozzles or pumped to truck mounted tank and sprayed on relevant areas.	As Needed to reduce dust	Need for wetting is decided by Worksite Manager/ EQ Manager.
Dust nuisance Equipment	Wetting capacity will be ensured following detailed planning of the drainage system. In case capacity is insufficient either municipal water or water from the harbour basin may be used. Necessary equipment including hoses, pumps, truck mounted tanks etc. will be kept in operational state and maintained according to company maintenance plans.	Monthly Yearly	Worksite Manager/ EQ Manager
Registration of impacts on surroundings	Dust nuisance impacting the surroundings should be registered in the operation record. See EHS-PRO-321 - Environmental Monitoring. Any dust complaints submitted directly to the company or via the municipality and the relevant mitigation actions must be registered in company log and be available to the authorities on demand.	Continuous	Worksite Manager / EQ Manager

11.5 NORM

Semco Maritime A/S will handle all NORM contaminated material that may be at the M.A.R.S. Europe Site in an environmentally safe matter. See ANNEX 11 for NORM handling Flow Chart.

11.6 Environment monitoring

M.A.R.S Europe implemented a procedure for environment monitoring (EHS-PRO-321).[24] Environment emissions are monitored and inserted in Environmental Accounting and Reporting system (EHS-FRM-539), assessing the environment impact. Quarterly reports are delivered to client.

12 Emergency planning

This section outlines the emergency response actions to be taken by all personnel on the Project in the event of emergency scenarios. Details are described in Emergency Action and Medical Evacuation Guidelines [26].

12.1 Reporting and notification of emergencies

Any emergency shall be reported immediately to the employees' supervisor or senior site supervisor. Raise the alarm and get help before responding. Management will notify all site personnel by the most appropriate means available. This could be by alarms, signals, radios, word of mouth, or public address system.

Employees are to respond to an injury, fire, spill, or uncontrolled release only to the level of their training.

As appropriate for the emergency, evacuate the area so the emergency personnel and equipment can safely approach the area. Evacuation plans and route are to be displayed in public areas.

Certain personnel will be designated to assist in directing emergency crews and evacuation routes, clearing buildings and work area, responding to the emergency, and assigned to shut down or operate critical equipment or emergency apparatus. After any emergency evacuation or drill, a muster of personnel will be made to account to all employees, sub-contractors, and visitors.

12.2 Emergency Response Plan

The Emergency Response Plan (ERP) has been developed with the intention of providing practicable guidelines in case of an incident/emergency. To keep it as short as reasonably possible, only the most necessary pieces of information are included in the plan.

This plan addresses the following emergency situations:

- Accidental injuries
- Medical emergencies
- Fires & explosions
- Hazardous spills
- Accidental collapses of structures and vehicles
- Other accidents/incidents which lead to an emergency.

M.A.R.S Europe Emergency Response Plan (EHS-PRO-351) implemented rescue teams for fire, first aid, confined space/ work at height rescue, NORM contamination, MOB, and other. (Annex 16).

A Fluminense Specific Response Plan will be developed after contract awarding, including the client contact details, Fluminense access, Alarm system, Safety points,

Lifesaving appliances/ fire equipment, Evacuation points, Risk analysis, Escape routes plans. The specific response plan will work together with M.A.R.S Europe emergency plan.

12.3 External Emergency Assistance

Medical Evacuation



Call 112 and inform

- Address (Where the accident has happened)
- Type of accident (What has happened)
- Number of injured persons
- Telephone number called from

Agree where the emergency vehicle(s) are met

Figure 5 Medical Services

Fire



Call 112 and inform

- Address (Where the fire has broken out)
- What is burning
- Number of persons in danger
- Telephone number called from

Agree where the emergency vehicle(s) are met

Internal Firefighting

- If possible, trained personnel must fight the fire with on-site material until the fire department arrives and takes over

Environmental Emergency



Call 112 and inform about larger or dangerous spills

- Address (Where the accident has happened)
- Type of accident (spill, smoke, fumes, etc.)
- Number of persons in danger
- Telephone number called from

Agree where the emergency vehicle(s) are met. All spills must be cleaned up using personnel trained for this kind of work!

Small or non-dangerous spills – stop spill from spreading

Figure 6 Firefighting services

12.4 M.A.R.S Contact Information

M.A.R.S. H.S.S.E. Manager: Alexandru Simion +45 40 41 02 17
M.A.R.S. Site Emergency Number: Site Guard +45 40 41 81 39
M.A.R.S. CEO: Kim Thygesen
+45 53 36 51 79

On the back of work ID card, the contact information's are clearly marked, for fast reaction time in case of emergency.

12.5 Drills and Emergency teams

An emergency drill schedule plan (EHS-FFO-913) was developed by M.A.R.S Europe, conducting exercises and train employee to react safe and calm in case of a dangerous situation. Emergency rescue teams were created according to experience and training (fire team, first aid, oil pollution, confined space, work at height). A drill report is filled up, monitoring the events, and is used to process the data gathered, to improve reaction time and is presented as lesson learned to all employees.

13 Observation card and reporting system

The procedures are described in [14] [21] and [25].

Observation card system (paper/digital- “Mellora”) is the system in place for fast reporting an incident. Site supervisors are equipped with work phone with emergency contact numbers and training was provided with procedures above. All observations are monitored and tracked down, providing inputs for M.A.R.S Europe KPI.

- Report incident/ near miss / unsafe condition immediately to the M.A.R.S. Europe Site Manager, H.S.S.E. Manager or H.S.S.E. Supervisor.
- Take preventive and damage-limiting measures as soon as possible.
- Fill out and transmit the Unsafe/Near Miss/Incident report to the M.A.R.S. Europe H.S.S.E. Department within 24 hours. (via observation card system - paper/ digital).
- Supply the Company with a copy of this form, if required.
- Unsafe/Near Miss/Incident reporting can be done verbally (immediately) and written (within 24 hours).

An incentive program was implemented by M.A.R.S Europe, in which the best observation card of the month, is rewarded. The observation is presented to the entire yard during the site toolbox talk meetings, to raise awareness between employees.

14 Incident investigation and reporting

The investigation and reporting processes and analysis of work-related accidents, ill health, incidents and near misses forms a critical element in improving management of health and safety. A thorough and well conducted investigation will provide a deeper understanding of the risks associated with work activities and enable effective, well thought-out risk control measures to be put in place. Only by prompt reporting of work-related accidents, ill health, incidents and near misses can this occur. M.A.R.S. Europe will follow the incident investigation and reporting procedures [21].

Table 15 Incident severity matrix

Type (actual/potential)	Level 1	Level 2	Level 3
Personal injury	FAID	MTC/RWC	LTI or Fatality

Type (actual/potential)	Level 1	Level 2	Level 3
Near Miss	Low Potential, Lifesaving rules Event, Dropped object	Medium Potential	High Potential
Environmental <i>Onsite = all is contained and cleaned, for onshore nothing is permeated into ground or water (LOPC)</i>	-Onsite spill -Misabeled or miss handled waste	-Spill to environment -misabeled hazardous waste shipped	-Spills to environment >1000 l -knowingly / willingly harming the environment with the examples of level 3 -incidents with heavy local or any regional environmental impact
Damage <i>(3rd party is, but not limited to, client, subcontractor, port or other vessels)</i>	Damage to asset <30.000 DKK	30.000 DKK < Damage to asset < 1.000.000 DKK	1.000.000 DKK < Damage to asset < 1.000.000 euro Damage to third party assets
Security (ISPS)	Attempt of unauthorized people accessing property	Unauthorized people on property	Attack on site, employees, or assets with malicious intent
Notification distribution	Company representative (Max 4 hours) On site / Call Within 24 hours (written)	Company representative (Max 4 hours) On site / Call Within 24 hours (written)	Company representative (Max 4 hours) On site / Call Within 24 hours (written)
Investigation Report distribution	Within 30 days, Withing 7 days for Violation for lifesaving rules	Within 30 days	Within 30 days

The initial step in the investigation shall be to complete the Incident Report relative to the type of incident, as soon as possible after the incident, such as a notification report. Routing of the report shall be as set forth on the form or electronic workflow on the computer form. A copy of the notification Incident Report shall become part of the Incident Investigation Report. All applicable areas of the incident report must be completed, the injured persons contact information, time on shift, physical and mental status if applicable, witness contact information, time of day, environmental conditions, etc.

A copy of incident investigation report will be provided with client, according to the agreement.

A written notification report will be issued to clients within 24 hours for first aid/near miss/ minor oil spill investigations events, for medical treatment/ restricted work case investigation (verbal and written).

The final investigation report will be issued withing 30 days for first aid /near miss/ minor oil spill, medical treatment / restricted work case/ and for Level 3 investigation 1 to 2 months, depending on documenting all events and evidence.

A project Fluminense incident action tracker will be developed, keeping evidence of all incidents and the status of actions assigned.

15 Performance reporting (KPI)

Weekly and monthly information concerning health and safety performance must be reported both internally to the M.A.R.S. Europe H.S.S.E. department and to the client. The safety performance report must include information on accidents, incidents, injury, and job hours as well as basic causes of incidents/accidents.

M.A.R.S. Europe safety management will liaise closely with company safety management and where safety trends are identified, will assist in developing and implementing safety campaigns.

M.A.R.S. Europe may also use observations to identify any M.A.R.S. Europe specific safety trends and use 'in house safety campaigns.

M.A.R.S. Europe is using "Mellora" for KPI Trending and the EHS-FRM-552 KPI register form (example in tables below).

Table 16 M.A.R.S. HSSE Statistics

M.A.R.S. H.S.S.E. Statistics																	
H.S.S.E. Reportable performance	Working Hours	Near Miss	High Potential Near Miss	First Aid	Medical Treatment	Restricted Work Case	LTI	Fatalities	TRIF	Security	Minor Oil Spill	Major Oil Spill	Loss of Primary Containment (LOPC)	Dropped Object	Lifesaving rules violation	Motor Vehicle Incident	Process Safety Event
Month																	
Year to Date																	
Contract to Date																	

M.A.R.S H.S.S.E. Statistic								
H.S.S.E. Reportable performance	Cold Work Permits	Hot Work Permits	Observation Cards	Safety Inductions	Trainings	Permit to Work Audits	Drills Planned	Drills Performed
Month								
Year to Date								
Contract to Date								

16 Annex

16.1 Annex 1 Everyone Committed Policy



M.A.R.S. Europe

Revision: B	Environmental, Health, & Safety	EHS-POL-103
Date: 03FEB22		Page 1 of 2
TITLE: Everyone Committed Policy		

SAFETY: everyone committed

INVOLVEMENT

- Doing a high-quality job safely is your first concern

RETURN HOME SAFE AND SOUND

- Apply the STOP & CONSULT procedure
- Wear the prescribed Personal Protective Equipment
- Do a Last Minute Risk Assessment prior to starting a job
- Use the appropriate equipment and tools
- Report dangerous situations

MINDSET AND BEHAVIOUR

- Safety starts with yourself
- Rather lose 1 minute of your life on working safely than lose your life in 1 minute by working unsafe
- Be aware of the risks, take action to eliminate or reduce them
- Know and apply the procedures and instructions
- There are no good excuses to work in an unsafe way
- Never mistake "action" for "hurry"
- Good behavior deserves a pat on the back

ORGANIZATION

- Tools and equipment are safe to use
- A neat and clean working environment is a must
- A proactive approach is required
- Take 5 minutes to prepare and prevent losing 5 hours to correct

Chief Executive Officer

Date

16.2 Annex 2 Drug and Alcohol Policy

M.A.R.S. Europe



Revision: B	Environmental, Health, & Safety	EHS-POL-104
Date: 03FEB22		Page 1 of 2
TITLE: Drug and Alcohol Policy		

Drugs and Alcohol Policy

M.A.R.S. Europe is committed to maintaining a healthy and productive workplace through the highest standards of safety and employment practice, concern for the environment and reduction of risk in all its areas of activity.

M.A.R.S. Europe recognizes that the use of illegal drugs, misuse of legal drugs (including solvents) and the abuse of alcohol can impair job performance at work and can be a serious threat to safety, health, productivity and the environment.

All M.A.R.S. Europe staff, sub-contractors, staff and labor agencies, consultants and any of their employees are required to comply with this policy when providing services at M.A.R.S. Europe or on M.A.R.S. business. M.A.R.S. Europe will ensure that they are made aware of this policy as part of its induction and communication procedures.

No member of the M.A.R.S. Europe staff, work force or subcontractors, labor agencies, consultants and any of their employees shall:

- Report for duty under the influence of alcohol or illegal drugs, or the misuse of legal drugs (including solvents).
- Report for duty in an unfit state due to the use of alcohol, illegal drugs, or the misuse of legal drugs (including solvents).
- Consume alcohol or illegal drugs, or misuse legal drugs (including solvents) whilst on duty.

M.A.R.S. Europe reserves the right to test 'with cause' if any of the above characteristic are suspected. M.A.R.S. Europe routinely carries out random drugs and alcohol testing on projects and at offices.

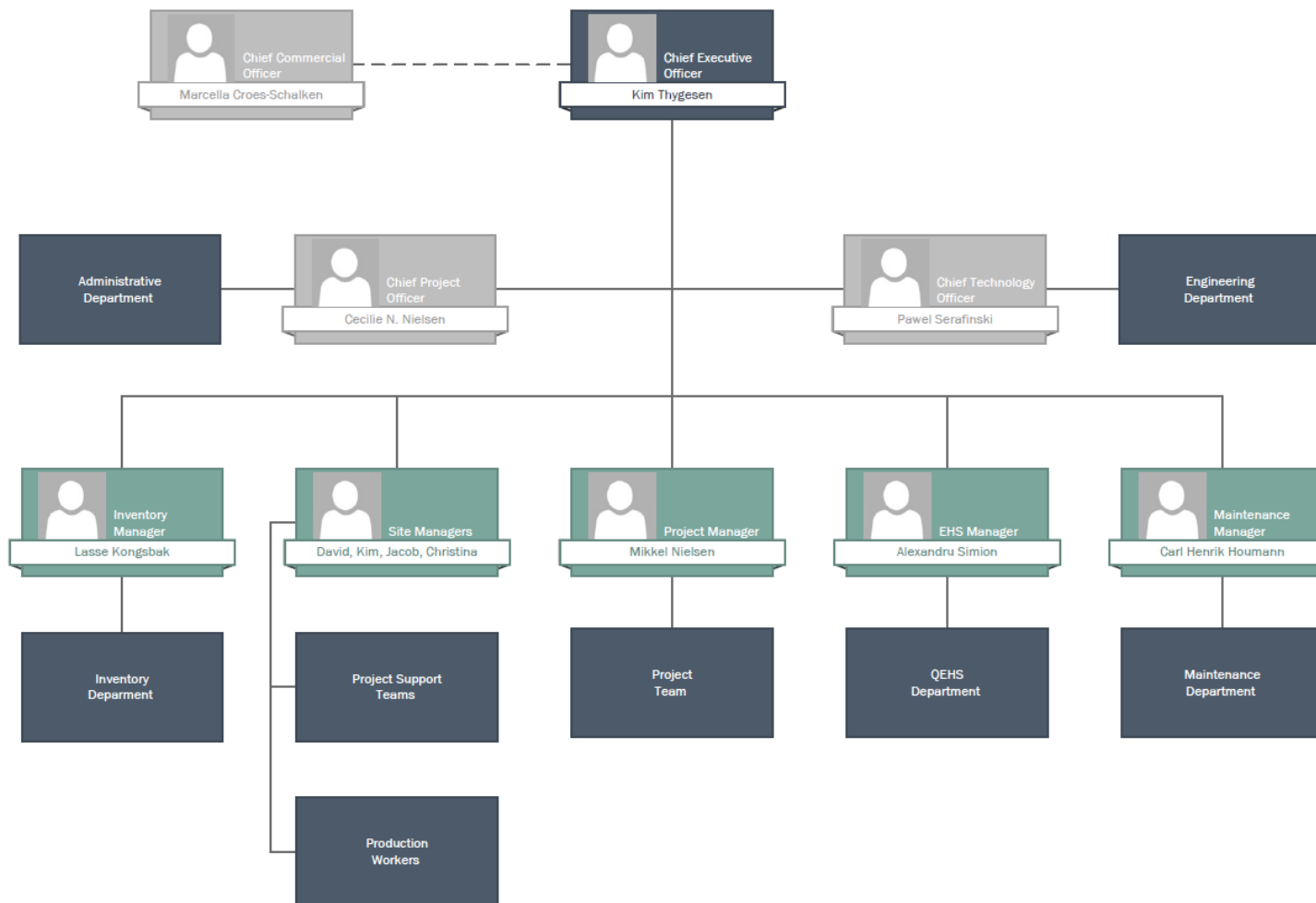
All work activities will be carried out with proper regard for this policy and associated procedures. All those engaged to work with M.A.R.S. Europe on a site with specific client requirements are expected to comply fully with the provisions and working practices on that site including any additional client specific requirement.

Any worker found in breach of this Policy will be excluded from their place of work and will be liable to disciplinary action, which may ultimately result in dismissal. Any person so excluded may be refused access to the yard/office in the future.

Chief Executive Officer

Date

16.3 Annex 3 Organization structure



16.4 Annex 4 List of H.S.S.E. key personnel

16.4.1 H.S.S.E. Manager

Responsibilities

- Remain abreast of all relevant H.S.S.E. laws, codes of practices and standards.
- Provide project management with H.S.S.E. information current to their requirements.
- Ensure H.S.S.E. standards developed for the project meet with international best practices.
- Provide project management with feedback on H.S.S.E. performance.
- Work with project management on development of suitable hazard controls interventions.
- Schedule and coordinate H.S.S.E. activities.
- Liaise with statutory authorities and industry bodies on H.S.S.E. requirements and systems.
- Review overall project performance and reports.
- Develop emergency response systems.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).

Activities

- Regularly contact statutory and industry bodies in cooperation with the client.
- Receipt and circulation of relevant H.S.S.E. information.
- H.S.S.E. audits and reviews.
- Develop and implement H.S.S.E. training program.
- Statistical analysis and injury/damage trends.
- H.S.S.E. plan and procedures development and review.
- Attendance at senior H.S.S.E. meetings.
- Site visits and liaison with M.A.R.S. Europe management, sub-contractor management, H.S.S.E. personnel and employees.

16.4.2 H.S.S.E. Supervisor / Permit Manager

Responsibilities

- Remain abreast of project relevant H.S.S.E. laws, codes of practice and standards applicable to the project.
- Provide construction and operations management with H.S.S.E. information current to their requirements.

- Ensure project H.S.S.E. standards meet with international best practice.
- Interface with the client's H.S.S.E. representative when required.
- Provide project line-managers with feedback on H.S.S.E. performance and trends.
- Work with project line-managers on the development of suitable hazard controls and interventions.
- Necessitate equipment mobilization inspections.
- Schedule and coordinate H.S.S.E. activities.
- Review area H.S.S.E. performance and advise line-managers of findings and potential solutions.
- Act as a role model for all employees. (PPE usage, safety standards, communication, behavior, respect, integrity, trust, accountability, positivity).

Activities

- Regular contact with supervisors/foremen and employees on H.S.S.E. requirements and issues.
- Receipt and circulation of relevant H.S.S.E. information.
- Workplace H.S.S.E. inspections, audits, and reviews.
- Provide information and H.S.S.E. training for employees.
- Provide feedback on emergency requirements and exercises.
- Provide information and H.S.S.E. reports for the weekly H.S.S.E. meetings and reviews.
- Assist with the ongoing review and development of H.S.S.E. plans and procedures.
- Attendance and involvement at H.S.S.E. meetings.
- Provide feedback on H.S.S.E. equipment suitability and usage.
- Permit control and review.
- Provide feedback on incident/hazard reporting requirements and investigation standards.
- Conduct H.S.S.E. Induction courses for new arrivals/visitors.
- Implementation of Emergency Response system and procedures.
- Coordinate Emergency Response Teams.
- Coordinate Permit to work system

16.6 Annex 6 Toolbox talk registration form



Revision: D	M.A.R.S. Europe	EHS-FRM-530
Date: 11 NOV20	Environmental, Health, and Safety	Page 1 of 1
TITLE: Toolbox Talk Form (TBT)		

Toolbox Talk Number:

All Toolbox / Pre-start Talks are recorded on this form and signed by participants.

All corrective actions noted on this form are implemented and signed by the nominated person. It is the responsibility of the Works Supervisor to ensure that all corrective actions are completed and reviewed for effectiveness. Change of work criteria = new TBT

Date: _____ Project: _____

Location: _____ Facilitator: _____

Topics: _____

Participants:


	Print Name	Company	Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			

Tasks:

Comments: _____

Corrective Actions: _____

16.7 Annex 7 Workplace inspection report



Workplace Inspection Report

Inspection Location: _____ Date of Inspection: _____
 Department / Areas Covered: _____ Time of Inspection: _____

Observations					For Future Follow-Up		
Item and Location	Hazard(s) Observed	Repeat Item Y/N	Priority A/B/C	Recommended Action	Responsible Person	Action Taken	Date

Copies to: _____ Inspected by: _____

Page 1 of 1
EHS-FRM-533 RevA
09Sep19

16.8 Annex 8 H.S.S.E. Policy



M.A.R.S. Europe		
Revision: E	Environmental, Health, & Safety	EHS-POL-100
Date: 10FEB22		Page 1 of 2
TITLE:		EHS Policy

Environmental, Health, and Safety Policy Statement

M.A.R.S. Europe embraces environmental, health and safety objectives as core business values. The company is committed to fulfill the environmental obligations outlined in the Environmental Approval, and all legal and other requirements.

The company is committed to encourage participation and consultation of all workers and workers' representatives.

The company strives to provide for employee's livelihood, client needs, and shareholder returns through the application of management systems that protect the environment, safeguard employee's health, and eliminates injuries to people.

M.A.R.S. Europe believes these goals may best be achieved by:

Senior Management leadership and involvement.

Education of employees on safe work performance.

Proactive hazard identification, elimination, and control.

Continuous EHS improvement process.

Promotion of an "Incident and Injury Free Safety Culture" both on and off the job.

Accepting that Safety is good business and a critical aspect of a high-performance organization.

Taking action to reduce environmental impact before it happens.

M.A.R.S. Europe's business plans include measurable EHS objectives and targets so that everyone who performs work for the company is responsible to help achieve these objectives.

M.A.R.S. Europe's scope is **onshore decommissioning, disposal, and recycling of offshore and maritime structures.**

Chief Executive Officer

Date

16.9 Annex 9 Quality Policy



M.A.R.S. Europe

Revision: C	QUALITY MANAGEMENT SYSTEM	QMS-POL-101
Date: 10FEB22		Page 1 of 2
TITLE: Quality Policy		

Corporate Quality Policy Statement

The Quality mission of M.A.R.S. Europe and its subsidiaries is to diligently pursue operational and financial objectives while maintaining the highest regard for the management of Quality performance and ensure continual improvement. M.A.R.S. Europe will be the Recycling Services provider of choice through continued customer satisfaction with "Incident and Injury Free" work environments.

As such, we will provide our customers with products and services that meet or exceed industry standards, customer specifications and regulatory requirements. Through our Quality Management System, we will provide these products and services on time and within specifications, the first time and every time.

M.A.R.S. Europe's executive management fully supports the establishment and implementation of the Quality Management System. The Senior Leadership Team shall promote a quality work environment that encourages continual improvement in all operational and QEHS processes, and a commitment from all employees to provide the highest quality of work in all day-to-day activities.

M.A.R.S. Europe Quality Management System scope is documented as follows:
Onshore decommissioning, disposal, and recycling of offshore and maritime structures

COO

Date



16.10 Annex 10 Environmental policy



M.A.R.S. Europe

Revision: F	Environmental, Health, & Safety	EHS-POL-101
Date: 20MAY22		Page 1 of 2
TITLE: Environmental and Waste Management Policy		

Waste Management Policy

In conjunction with the Laws and Regulations of the countries we operate in, the EU Directive on Waste, and Environmental best practices M.A.R.S. Europe will endeavor to reduce waste generated and to dispose of waste in a way that minimizes impact to the environment. It is M.A.R.S. Europe's Policy that:

No waste will be transferred from a facility, barge or vessel without a proper container, identifying label and a completed Bill of Lading, Declaration of Dangerous Goods, or Hazardous Waste Transfer Manifest.

M.A.R.S. Europe, will employ the **The Three Rs of Environmental Management:**

Reuse

- Reuse engines, storage tanks and other merchantable items.
- Reuse containers, boxes, and packaging materials.
- Reuse office equipment.

Reduce

- Manage propane, diesel, water & electric power economically.
- Manage water consumption by using storm water for dust prevention.
- Reduce the use of disposable cups and dinnerware.
- Give preference to washable mugs and cups.

Recycle

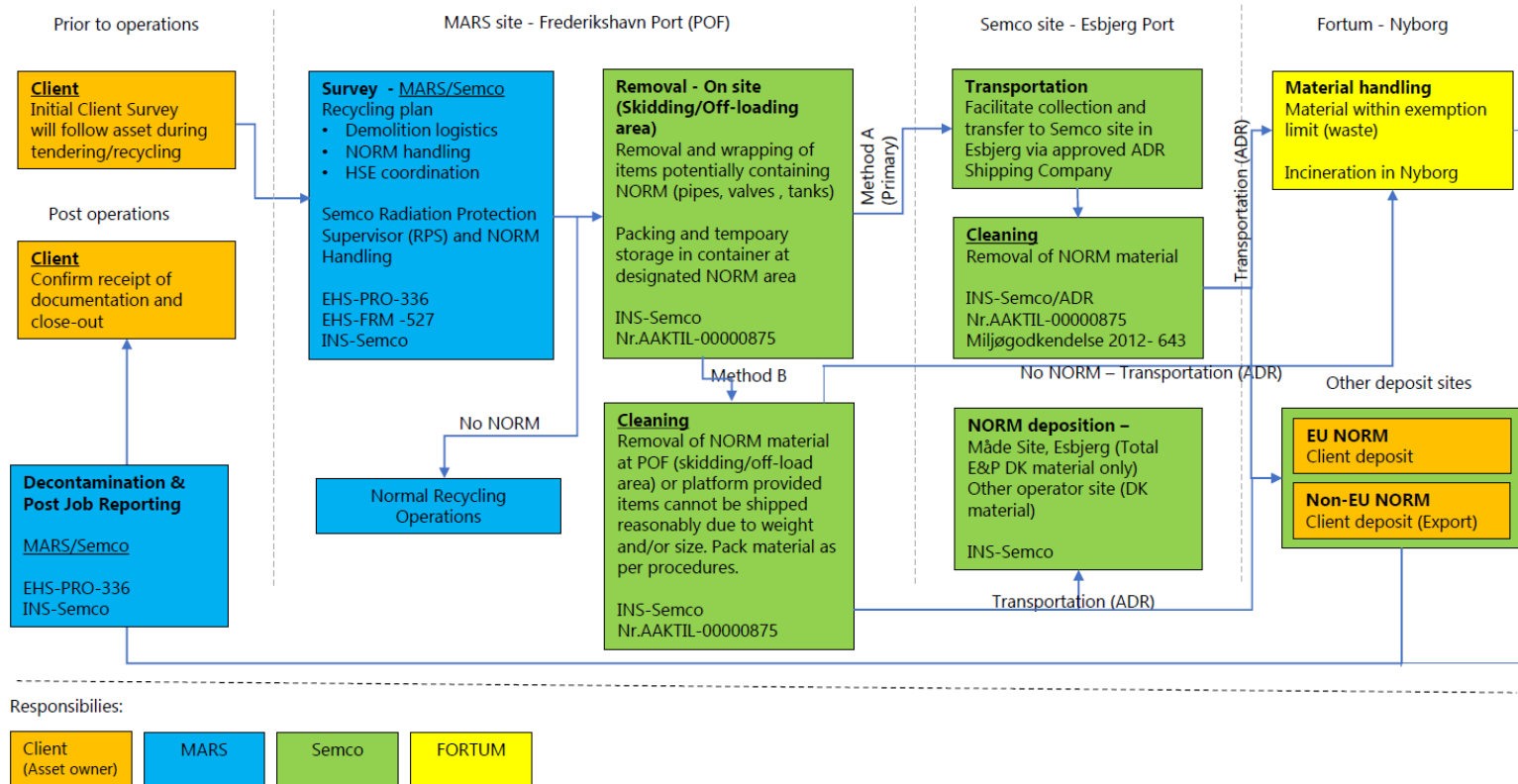
- Use recycled products where possible.
- Recycle metals, plastic, paper, and other material.



.....
CEO

.....
Date

16.11 Annex 11 NORM Flow Chart



16.12 Annex 12 ISO 9001 Certificate

Bureau Veritas Certification


BUREAU VERITAS

Modern American Recycling Services Europe

Sandholm 55 H, 9900 Frederikshavn, Denmark

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 9001:2015

Scope of certification

Onshore decommissioning, disposal, and recycling of offshore and maritime structures.



Original cycle start date:	04-05-2021
Expiry Date of Previous Cycle:	NA
Certification/Recertification Audit Date:	NA
Certification / Recertification cycle start date:	04-05-2021
Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on:	03-05-2024

Certificate No.: **DK014317** Version: **1** Issue Date: **04-05-2021**



Certification Body Address: 5th Floor, 66 Prescott Street, London, E1 8HG, United Kingdom
Local Office: Bureau Veritas Certification Denmark A/S, Oldenborggade 25-31, 7000 Fredericia


0008

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: (+45) 77 311 000



Date: 26.06.2023
Rev.: 01

Contract: N/A
Doc. ID: BJSA-MAR-000-PM-PLN-0003
Doc. Title: HSSE Management Plan



Modern American Recycling Services Europe

ISO 9001:2015

Scope of certification

Site Name/Location	Site Address	Site Scope
Modern American Recycling Services Europe	Sandholm 55 H, 9900 Frederikshavn, Denmark	Onshore decommissioning, disposal, and recycling of offshore and maritime structures.
Sandholm 55A	Sandholm 55A, 9900 Frederikshavn, Denmark	
Sandholm 60	Sandholm 60, 9900 Frederikshavn, Denmark	

Certificate No.: **DK014317** Version: **1** Issue Date: **04-05-2021**

Philipp Absalonson



0008

Certification Body Address: 5th Floor, 66 Prescott Street, London, E1 8HG, United Kingdom

Local Office: Bureau Veritas Certification Denmark A/S, Oldenborggade 25-31, 7000 Fredericia

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: (+45) 77 311 000



16.13 Annex 13 ISO 14001 Certificate

Bureau Veritas Certification



Modern American Recycling Services Europe

Sandholm 55 H, 9900 Frederikshavn, Denmark

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Holding SAS – UK Branch certifies that the Management System of the above organisation has been audited and found to be in accordance with the requirements of the management system standards detailed below

ISO 14001:2015

Scope of certification

Onshore decommissioning, disposal, and recycling of offshore and maritime structures.



Original cycle start date:	04-05-2021
Expiry Date of Previous Cycle:	NA
Certification/Recertification Audit Date:	NA
Certification / Recertification cycle start date:	04-05-2021
Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on:	03-05-2024

Certificate No.: **DK014319** Version: **1** Issue Date: **04-05-2021**



Certification Body Address: 5th Floor, 66 Prescott Street, London, E1 8HG, United Kingdom
Local Office: Bureau Veritas Certification Denmark A/S, Oldenborggade 25-31, 7000 Fredericia

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: (+45) 77 311 000



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BUREAU
VERITAS

Bureau Veritas Certification

Modern American Recycling Services Europe

ISO 14001:2015

Scope of certification

Site Name/Location	Site Address	Site Scope
Modern American Recycling Services Europe	Sandholm 55 H, 9900 Frederikshavn, Denmark	Onshore decommissioning, disposal, and recycling of offshore and maritime structures.
Sandholm 55A	Sandholm 55A, 9900 Frederikshavn, Denmark	
Sandholm 60	Sandholm 60, 9900 Frederikshavn, Denmark	



Certificate No.: **DK014319** Version: **1** Issue Date: **04-05-2021**

Philip Absalonsen



0008

Certification Body Address: 5th Floor, 66 Prescott Street, London, E1 8HG, United Kingdom

Local Office: Bureau Veritas Certification Denmark A/S, Oldenborggade 25-31, 7000 Fredericia

Further clarifications regarding the scope and validity of this certificate, and the applicability of the management system requirements, please call: (+45) 77 311 000



16.14 Annex 14 ISO 45001 & Executive Order 1409 Certificate

Bureau Veritas Certification



Modern American Recycling Services Europe

Sandholm 55 H, 9900 Frederikshavn, Denmark

This is a multi-site certificate, additional site(s) are listed on the next page(s)

Bureau Veritas Certification Denmark A/S certifies that the Management System of the above organization has been audited and found to be in accordance with the requirements of the management system standards detailed below.

Standard

ISO 45001:2018

Executive Order Nr. 1409/2020

Scope of certification

Onshore decommissioning, disposal, and recycling of offshore and maritime structures.



Original Cycle Start Date:	04-05-2021
Expiry date of previous cycle:	NA
Certification/Recertification Audit date:	NA
Certification/Recertification cycle start date:	04-05-2021
Subject to the continued satisfactory operation of the organization's Management System, this certificate expires on:	03-05-2024

Certificate No.: **DK014322** Version: **1** Issue Date: **04-05-2021**





DANAK
SYSTEM Reg.nr. 6502

Certification Office: Bureau Veritas Certification Denmark A/S Oldenborggade
25-31, 7000 Fredericia, Denmark

Further clarifications regarding the scope of this certificate and the applicability of the Management System requirements may be obtained by consulting the organization. To check this certificate validity, please call: (+45) 77 311 000.

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BUREAU
VERITAS

Bureau Veritas Certification

Modern American Recycling Services Europe

Standard

ISO 45001:2018

Executive Order Nr. 1409/2020

Scope of certification

Site Name/location	Site Address	Site Scope
Modern American Recycling Services Europe P-no.: 1023664530	Sandholm 55 H, 9900 Frederikshavn, Denmark	Onshore decommissioning, disposal, and recycling of offshore and maritime structures.
Sandholm 55A P-no.: 1026708474	Sandholm 55A, 9900 Frederikshavn, Denmark	
Sandholm 60 P-no.: 1026708466	Sandholm 60, 9900 Frederikshavn, Denmark	

Certificate No.: **DK014322** Version: **1** Issue Date: **04-05-2021**

DANAK
SYSTEM Reg.nr. 6502

Certification Office: Bureau Veritas Certification Denmark A/S
Oldenborggade 25-31, 7000 Fredericia, Denmark

Further clarifications regarding the scope of this certificate and the applicability of the Management System requirements may be obtained by consulting the organization. To check this certificate validity, please call: (+45) 77 311 000.



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16.15 Annex 15 M.A.R.S. Europe Master Document Register

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
M.A.R.S EUROPE INTEGRATED MANAGEMENT SYSTEM				
M.A.R.S. EUROPE STRATEGY	IMS-POL-100	C	26-Jan-22	yearly
IMS MANUAL	IMS-MAN-200	A	13-Jan-21	3 Year
MANAGEMENT REVIEW	IMS-PRO-300	H	1-Mar-22	3 Year
ANALYSIS OF INTERNAL AND EXTERNAL ENVIRONMENT	IMS-PRO-301	B	1-Mar-22	3 Year
INTERNAL AUDIT	IMS-PRO-302	B	8-Mar-22	3 Year
ASSESSING RISKS AND OPPORTUNITIES	IMS-PRO-303	C	18-Feb-22	3 Year
INTERESTED PARTIES	IMS-PRO-304	E	6-Jan-22	3 Year
MANAGEMENT OF CHANGE	IMS-PRO-306	D	12-Feb-21	3 Year
MANAGEMENT REVIEW	IMS-FRM-500	E	1-Mar-22	3 Year
PROCESS DESCRIPTION	IMS-FRM-502	A	13-Jan-20	3 Year
Management of Change Form	IMS-FRM-504	C	12-Feb-21	3 Year
ENVIRONMENTAL, HEALTH & SAFETY POLICY				
ENVIRONMENTAL, HEALTH & SAFETY POLICY	EHS-POL-100	E	10-Feb-22	Yearly
ENVIRONMENTAL AND WASTE MANAGEMENT POLICY	EHS-POL-101	E	8-Feb-22	Yearly
STOP WORK POLICY	EHS-POL-102	C	3-Feb-22	Yearly
EVERYONE COMMITTED POLICY	EHS-POL-103	B	3-Feb-22	Yearly
DRUG AND ALCOHOL POLICY	EHS-POL-104	B	3-Feb-22	Yearly
NORM POLICY	EHS-POL-105	C	28-Mar-22	Yearly
ENVIRONMENTAL OBJECTIVES	EHS-POL-106	B	6-Jan-22	Yearly
OHS Objectives	EHS-POL-107	B	6-Jan-22	Yearly
No Blame Policy	EHS-POL-108	C	3-Feb-22	Yearly
No Smoking Policy	EHS-POL-109	B	3-Feb-22	Yearly
MERCURY MEMO				
MERCURY MEMO	EHS-MAN-201	C	16-Feb-21	3 Year
GENERAL EHS PLAN				
GENERAL EHS PLAN	EHS-MAN-202	B	14-Feb-22	Yearly
HOT WORK PERMITTING				
HOT WORK PERMITTING	EHS-PRO-300	F	28-Jun-22	Yearly
WELDING & FLAME CUTTING				
WELDING & FLAME CUTTING	EHS-PRO-301	E	26-Jan-22	Yearly
COSHH CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH				
COSHH CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH	EHS-PRO-302	D	8-Dec-20	3 Year
STOP WORK AUTHORITY (SWA)				
STOP WORK AUTHORITY (SWA)	EHS-PRO-303	D	15-Feb-22	3 Year
HAZARDOUS GOODS / HAZARDOUS MATERIALS TRANSPORTATION				
HAZARDOUS GOODS / HAZARDOUS MATERIALS TRANSPORTATION	EHS-PRO-304	D	30-Nov-20	3 Year
HAZARD COMMUNICATIONS - RIGHT TO KNOW				
HAZARD COMMUNICATIONS - RIGHT TO KNOW	EHS-PRO-305	D	15-Feb-22	3 Year
WASTE AND MATERIAL MANAGEMENT PLAN				
WASTE AND MATERIAL MANAGEMENT PLAN	EHS-PRO-306	H	17-Nov-20	3 Year
HAZARDOUS MATERIALS RESPONSE				
HAZARDOUS MATERIALS RESPONSE	EHS-PRO-307	D	16-Aug-18	3 Year
INCIDENT AND INJURY REPORTING				
INCIDENT AND INJURY REPORTING	EHS-PRO-309	F	12-May-21	3 Year
SECOND LEVEL INCIDENT INVESTIGATION GUIDANCE				
SECOND LEVEL INCIDENT INVESTIGATION GUIDANCE	EHS-PRO-310	C	28-Mar-22	3 Year
JOURNEY MANAGEMENT AND DRIVING STANDARD				
JOURNEY MANAGEMENT AND DRIVING STANDARD	EHS-PRO-311	C	28-Mar-22	3 Year
HAZARD IDENTIFICATION AND RISK ASSESSMENT				
HAZARD IDENTIFICATION AND RISK ASSESSMENT	EHS-PRO-313	E	26-Mar-21	3 Year
JOB SAFETY ANALYSIS PROGRAM.				
JOB SAFETY ANALYSIS PROGRAM.	EHS-PRO-314	C	18-May-21	3 Year
PERSONAL PROTECTIVE EQUIPMENT				
PERSONAL PROTECTIVE EQUIPMENT	EHS-PRO-315	E	17-May-21	3 Year

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
OCCUPATIONAL HEALTH	EHS-PRO-316	E	26-Mar-21	3 Year
ROOT CAUSE ANALYSIS	EHS-PRO-317	E	15-Feb-22	3 Year
LONE WORKER POLICY	EHS-PRO-319	D	16-Feb-22	3 Year
SIMOPS PLANNING	EHS-PRO-320	E	16-Feb-22	3 Year
ENVIRONMENTAL MONITORING	EHS-PRO-321	D	16-Dec-21	3 Year
PERMIT TO WORK SYSTEM	EHS-PRO-322	F	28-Jun-22	Yearly
COMPETENT PERSONS	EHS-PRO-323	D	16-Feb-22	3 Year
CONFINED SPACE	EHS-PRO-324	F	11-Oct-21	Yearly
BLINDING	EHS-PRO-325	C	16-Feb-22	3 Year
LOCKOUT TAGOUT	EHS-PRO-326	D	18-May-21	3 Year
Working At Height	EHS-PRO-327	F	28-Jun-22	Yearly
Asbestos	EHS-PRO-329	D	23-Mar-21	3 Year
OZONE DEPLETING SUBSTANCES (ODS)	EHS-PRO-331	D	16-Dec-21	3 Year
Scaffold and Ladder Safety	EHS-PRO-332	D	18-May-21	3 Year
RESPIRATORY PROTECTION	EHS-PRO-333	C	28-Mar-22	3 Year
Cranes and Rigging (LAG)	EHS-PRO-334	C	18-May-21	3 Year
Naturally Occurring Radioactive Material (NORM)	EHS-PRO-336	J	17-Mar-22	3 Year
Benzene	EHS-PRO-341	B	12-Jun-18	3 Year
Lead	EHS-PRO-342	C	8-Feb-22	3 Year
Cadmium Awareness	EHS-PRO-343	C	1-Jun-22	3 Year
H2S Guidelines	EHS-PRO-345	B	12-Jun-18	3 Year
Explosive Atmospheres	EHS-PRO-346	C	28-Mar-22	3 Year

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
Hexavalent Chromium Awareness	EHS-PRO-348	C	1-Jun-22	3 Year
Control of Monitoring & Measuring Devices	EHS-PRO-350	C	28-Mar-22	3 Year
Site Specific Emergency Response Plan	EHS-PRO-351	L	19-Aug-22	3 Year
Occupational Health & Safety Organisation	EHS-PRO-352	E	8-Dec-20	3 Year
Standard Operating Procedure - Cleaning (Change name)	EHS-PRO-354	A	9-Dec-19	3 Year
Hazardous waste - Labelling and Packagaing	EHS-PRO-355	A	6-Dec-19	5 year
Ship Recycling Facility Plan (SRFP)	EHS-PRO-357	D	16-Mar-22	3 Year
Standard Operating Procedure - Cleaning and maintenance	EHS-PRO-361	C	18-May-21	3 Year
Ship-breaking and Decommissioning, Flow Charts	EHS-PRO-362	C	1-Aug-17	
NORM-handling Flow Chart	EHS-PRO-363	B	26-Nov-19	3 Year
Dismantling of Non-Hazardous Waste	EHS-PRO-364	B	9-Mar-20	3 Year
Waste warehouse flow	EHS-PRO-365	A	9-Mar-20	3 Year
Operations & Maintenance Plan, M.A.R.S. Europe site	EHS-PRO-366	C	16-Mar-21	3 Year
Appendix for O&M Plan	EHS-PRO-367	B	31-Jul-20	3 Year
Handling of NORM (P-SEMCO-0074)	EHS-PRO-372	A	19-May-20	3 Year
Life Saving Rules	EHS-PRO-373	B	18-Mar-21	3 Year
Handheld Radios	EHS-PRO-375	A	31-Jul-20	3 Year
Mapping Flow	EHS-PRO-377	C	7-Jan-21	3 Year
Dismantling/Stripping Accommodation	EHS-PRO-378	B	28-Mar-22	Yearly
Lifting with Man Basket	EHS-PRO-379	A	8-Feb-21	3 Year
Work Schedule Extension	EHS-PRO-380	A	11-Feb-21	3 Year
Prevention of Dropped Objects	EHS-PRO-381	B	16-Dec-21	3 Year
UHP and HP Water Jetting	EHS-PRO-382	B	30-Jun-22	Yearly
Infectious Diseases Management	EHS-PRO-383	A	25-Oct-21	3 Year
Draining Procedure	EHS-PRO-384	B	24-Nov-21	3 Year
PCB Procedure	EHS-PRO-385	A	7-Dec-21	3 Year
Make safe process	EHS-PRO-386	A	7-Dec-21	3 Year

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
Tributyltin (TBT) Awareness	EHS-PRO-387	A	6/1/2022	3 Year
ENVIRONMENTAL ASPECT REGISTER PDF	EHS-RPT-701	E	10-Jan-22	5 year
OHS Organization Chart	EHS-RPT-708	B	16-Mar-22	Yearly
EHS Organization Chart	EHS-RPT-709	A	16-Mar-22	Yearly
Use of Floating Booms	EHS-WIN-402	D	28-Mar-22	3 Year
Dust Prevention	EHS-WIN-403	C	28-Mar-22	3 Year
Fall Protection Equipment Inspections	EHS-WIN-407	C	10-Feb-21	3 Year
Scaffold and Ladder Inspections	EHS-WIN-408	C	9-Feb-21	3 Year
RESPIRATORY PROTECTION INSPECTIONS	EHS-WIN-409	D	28-Mar-22	Yearly
Cranes Rigging and LAG Inspections	EHS-WIN-410	C	10-Feb-21	Bi-Yearly
Stored Energy	EHS-WIN-416	B	28-Jun-22	Yearly
Strong wind and storms	EHS-WIN-417	A	18-Jan-22	Yearly
HOT WORK PERMIT	EHS-FRM-500	C	27-Oct-20	5 year
Witness Statement Form	EHS-FRM-503	C	26-May-20	5 year
Job Safety Analysis FORM	EHS-FRM-505	B	30-Nov-17	5 year
HIRA Form	EHS-FRM-507	D	4-May-20	5 year
MoC Form	EHS-FRM-509	B	28-May-18	5 year
Cold Work Permit	EHS-FRM-510	C	27-Oct-20	5 year
Safe of Entry Certificate	EHS-FRM-513	B	8-Jun-18	5 year
FIRE EXTINGUISHER INSPECTION	EHS-FRM-520	B	9-Jun-18	5 year
Tool Box Safety Meeting	EHS-FRM-530	D	11-Nov-20	5 year
Lift Plan Check List	EHS-FRM-531	A	21-Oct-19	5 year
Last Minute Risk Assessment	EHS-FRM-532	A	23-Sep-19	5 year
Environmental Accounting and Reporting System	EHS-FRM-539	C	20-Nov-20	5 year
Waste accounting and reporting system	EHS-FRM-540	A	20-Aug-20	5 year
Safety Induction Form	EHS-FRM-541	A	23-Oct-20	5 year
Permit Register Form	EHS-FRM-542	A	23-Oct-20	5 year
Emergency Drill Plan	EHS-FRM-543	B	28-Mar-22	5 year
ISPS Employees Register Form	EHS-FRM-547	A	30-Oct-20	5 year
ISPS Visitors Register Form	EHS-FRM-548	A	30-Oct-20	5 year
Lifting Equipment Color Code	EHS-FRM-549	A	6-Nov-20	5 year
Work at Height Checklist	EHS-FRM-550	B	22-Aug-22	5 year
Environmental Inspection Plan	EHS-FRM-551	B	8-Feb-22	3 Year
Critical Lift Plan	EHS-FRM-552	D	2-May-22	5 year
KPI Register Form	EHS-FRM-553	A	8-Dec-20	5 year
Work schedule extension form	EHS-FRM-560	A	12-Feb-21	5 year
Scaffolding in operation	EHS-FRM-562	A	12-Feb-21	5 year
Scaffold - Inspection (danish)	EHS-FRM-563	A	12-Feb-21	5 year
Safety Induction Presentation_Employees	EHS-FRM-564	B	29-Mar-21	5 year
Local Chemicals	EHS-FRM-566	A	19-May-21	5 year
Register, Chemicals	EHS-FRM-567	A	19-May-21	5 year
EHS Weekly Progress Report	EHS-FRM-568	A	4-Jan-22	5 year
Prework Safety Inspection Checklist	EHS-FRM-569	A	5-Jan-22	5 year
Weekplan, Site Management	EHS-FRM-570	A	12-Jan-22	5 year
Confined Space checklist	EHS-FRM-571	B	22-Aug-22	5 year
Confined Space Rescue Plan	EHS-FRM-572	A	28-Mar-22	5 year

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
Hot Work Checklist	EHS-FRM-573	B	22-Aug-22	5 year
Emergency Response Exercise Report - Drill Report	EHS-FRM-580	A	28-Mar-22	5 year
WEHRA - Working Environment Health Risk Assessment	EHS-FRM-581	A	23-May-22	5 year
M.A.R.S. Europe Buildings	EHS-PLN-600	A	9-Dec-19	3 Year
Waste Warehouse Plan	EHS-PLN-601	E	2-Mar-20	3 Year
Site traffic plan	EHS-PLN-605	A	25-Feb-21	3 Year
List of Legal and Other Requirements	EHS-FFO-915	B	8-Jun-21	3 Year
QUALITY OBJECTIVES	QMS-POL-100	B	6-Jan-22	Yearly
QUALITY POLICY	QMS-POL-101	C	10-Feb-22	Yearly
QUALITY PLAN	QMS-PRO-201	C	7-Nov-22	3 Year
DOCUMENT CONTROL AND SHARING INFORMATION	QMS-PRO-308	B	22-Mar-21	3 Year
COLLECTING CUSTOMER FEEDBACK	QMS-PRO-309	A	15-Jan-20	3 Year
Inspection and Maintenance	QMS-PRO-313	B	22-Mar-22	3 Year
LEGAL AND OTHER REQUIREMENTS	QMS-PRO-315	G	1-Jun-22	Yearly
Daily Check, Reachstacker	QMS-FRM-503	C	18-Mar-21	5 year
Daily Check, Fuchs MHL 360	QMS-FRM-505	C	18-Mar-21	5 year
Daily Check, Manitowoc 18000	QMS-FRM-506	C	18-Mar-21	5 year
Daily Check, Terex Telelift 4017	QMS-FRM-509	C	18-Mar-21	5 year
Weekly Running Hours - M.A.R.S. Machinery	QMS-FRM-512	B	8-Feb-22	5 year
Weighbill, Materials and Steel	QMS-FRM-513	B	18-Feb-21	5 year
Daily Check, Mustang 1650R	QMS-FRM-516	A	18-Mar-21	5 year
Daily checklist, Grove GMK 6300L	QMS-FRM-517	A	17-Feb-22	Bi-Yearly
Daily checklist, Liebherr LR11350	QMS-FRM-518	A	17-Feb-22	Bi-Yearly
Daily checklist, CAT ST180 Excavator	QMS-FRM-519	A	17-Feb-22	Bi-Yearly
Daily checklist, CAT 950K Wheel Loader	QMS-FRM-520	A	17-Feb-22	Bi-Yearly
Daily Checklist, Kalmar Forklift	QMS-FRM-521	A	6-May-22	Bi-Yearly
Maintenance and Inspection Plan, 2022	QMS-FFO-901	B	24-Mar-22	Yearly
Assessment and approval of subcontractors	SCM-PRO-309	D	20-May-22	3 Year
Subcontractor Questionnaire	SCM-FRM-515	C	20-May-22	3 Year
Transport form	SCM-FRM-522	A	26-Sep-22	3 Year
Tracelink	SCM-WIN-400	B	22-Mar-22	3 Year
Recruiting Strategy	HRO-POL-101	B	11-Jun-21	3 Year
Anti-Corruption Compliance Policy	HRO-POL-102	B	31-Oct-17	5 year
Employee Handbook	HRO-MAN-200	O	24-Nov-22	3 Year
Organisation Structure	HRO-MAN-201	H	10-Mar-22	3 Year
Code of Business Conduct and Ethics	HRO-PRO-302	C	15-Feb-21	3 Year
Onboarding Procedure	HRO-PRO-304	B	5-Jan-22	3 Year
Training Matrix	HRO-PRO-305	E	16-Mar-22	Yearly

M.A.R.S Europe Master Document Register



Title	Number	Revision	Date	To be updated/reviewed
Competence Requirements - Burner, Process Field	HRO-PRO-309	B	1-Mar-22	Yearly
Competence Requirements - Hazmat Cleaner	HRO-PRO-311	B	1-Mar-22	Yearly
Competence Requirements - Burner, Hunker	HRO-PRO-313	B	1-Mar-22	Yearly
Competence Requirements - Machine Operator	HRO-PRO-319	B	1-Mar-22	Yearly
Training Procedure	HRO-PRO-320	C	17-May-22	Yearly
Instructions for Screenwork	HRO-WIN-400	B	16-Dec-21	3 Year
Musskema.dk	HRO-WIN-401	A	18-Jan-22	3 Year
Job Description Form	HRO-FRM-507	A	12-Nov-19	5 year
Attendance Sheet	HRO-FRM-508	A	27-Feb-20	5 year
Personal Information, new employees	HRO-FRM-512	D	7-Mar-22	5 year
Emergency contact person	HRO-FRM-513	A	12-Dec-20	5 year
Internal Training Certificate	HRO-FRM-514	A	1-Sep-21	5 year
General Data Protection Regulation (GDPR) Procedure	LGL-PRO-300	C	2-Feb-22	5 year

16.16 Annex 16 Emergency Response Plan

Procedure

Emergency Response Plan

Frederikshavn

L	22-AUG-22	Revised Document	Alexandru Simion	Cecilie Nielsen	Kim Thygesen
K	01-AUG-22	Revised Document	Alexandru Simion	Cecilie Nielsen	Kim Thygesen
J	27-OCT-21	Revised Document	Alexandru Simion	Kim Pedersen	Kim Thygesen
I	11-OCT-21	Revised Document	Alexandru Simion	Cecilie Nielsen	Kim Thygesen
H	08-DEC-20	Revised Document	Alexandru Simion	Cecilie Nielsen	Kim Thygesen
G	18-AUG-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	Kim Thygesen
F	22-JUL-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	Kim Thygesen
E	25-MAY-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	Kim Thygesen
D	20-MAY-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	Kim Thygesen
C	22-APR-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	
B	25-FEB-20	Revised Document	Dan T. Christensen	Cecilie Nielsen	
A	16-JAN-20	Initial Document	Dan T Christensen	Pawel Serafinski	
REV.	DATE	DESCRIPTION	WRITER	CONTROL	APPROVAL
			M.A.R.S. INTERNAL DOC NUMBER: EHS-PRO-351		

M.A.R.S. Europe

Environmental, Health, & Safety

Revision: L
Date: 19AUG22

EHS-PRO-351
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TITLE: Emergency Response Plan - Frederikshavn

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Environmental, Health, & Safety

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1.0 Introduction

1.1 Purpose

The purpose of this plan is to ensure that M.A.R.S. Europe can respond rapidly and appropriately in case of an emergency on the M.A.R.S. Europe’s dismantling projects to mitigate consequences. The Emergency Response Plan (ERP) has been developed to provide practicable guidelines in case of an incident/ or emergency. All M.A.R.S. Europe’s personnel, Company personnel, subcontractors, vendors, and visitors shall comply ERP when on the M.A.R.S. Europe’s Site in Frederikshavn, including storage facilities and offices.

1.2 Scope

The scope of the Emergency Preparedness Plan includes following:

- Fires & explosions.
- Hazardous spills.
- Medical emergencies.
- Rescue from Confined Space/ Work at height
- NORM emergencies
- Man overboard
- Ship/Asset drifting (Loose mooring lines)
- Security Breach
- Other accidents/incidents which lead to an emergency

1.3 Responsibilities

This ERP is prepared and kept updated by M.A.R.S. Europe EHS. Manager. It is done in coordination with regulations, site management, safety representative and relevant authorities. Site management is responsible for the execution of the ERP with the support of the EHS Manager.

The Emergency Response Organization structure is presented in Appendix 1 “Incident Categories”.

1.4 Terms and definitions

Term or Designations	Description / Definition
Audit	Systematic, internal documented process which obtains evidence and evaluates it objectively to determine whether or not the audit.

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Adapted or Restricted Work Activity Case	Number of workdays where injured person of work-related incident which considers no lost workdays performs “adapted work” or “restricted work”.
Confined Space	Space that is large enough for an employee to enter and perform the assigned work, but that has a limited or restricted means for entry or exit.
Competent Person	Someone who by virtue of their training or experience, or a combination of both, has been deemed competent by the Company for specific function or functions through an assessment process.
Emergency Response Plan	Emergency Response Plan are a critical component of workplace safety. Response time is an important aspect of emergency response. This refers to how long it takes emergency responders to arrive at the scene of an emergency after the emergency response system has been activated.
Environmental incident	Situation, which results in negative impact for the environment (soil, air, water).
Medical Emergency case	Limited to treatment for only minor injuries with non-prescription medication and, if necessary, subsequent observation.
Hierarchy of controls	Risk should be reduced to the lowest reasonably practicable level by taking preventive measures, in order of priority.
Incident	An unexpected event that leads to a loss of status quo or increased risk regarding human wellbeing, energy yield, environmental safety, device integrity.
Lost time incident	Number of workdays where injured person of work-related incident was not able to perform his/her tasks and absent from work. Also “days away from work”.
Last Minute Risk Assessment (LMRA)	Short risk assessment, carried out by the person that executes a job, prior to start working (stop and think) and necessary to discover risk factors.
Major Injury	Any fracture, amputation, dislocation of the shoulder, hip, knee, or spine. Loss of sight (whether temporary or permanent). A chemical or hot metal burn to the eye or penetrating injury to the eye. Any injury resulting from an electric shock or electrical burn (including any electrical burn caused by arcing or arcing products) leading to unconsciousness or requiring resuscitation or

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	<p>admittance to hospital for more than 24 hours. Any burns bigger than 3% of total body coverage due to flames or chemicals Any other injury:</p> <ul style="list-style-type: none"> • leading to hypothermia, heat-induced illness or to unconsciousness, • requiring resuscitation, or • requiring admittance to hospital for more than 24 hours. <p>Loss of consciousness caused by asphyxia or by exposure to a harmful substance or biological agent. Either of the following conditions which result from the absorption of any substance by inhalation, ingestion or through the skin:</p> <ul style="list-style-type: none"> • acute illness requiring medical treatment; or loss of consciousness. <p>Acute illness which requires medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.</p>
Medical treatment case	All other cases that do not result in Days Away from Work or Restricted Duty but are more serious than Medical Emergency cases.
Medical evacuation	All emergency transports will be performed by public ambulance. Non-emergency medical evacuation may be accomplished by ambulance or private vehicle depending on the nature and severity of the injury/illness and availability of transportation. If possible, the decision should be made by a doctor or a paramedic.
Minor Injury	Injury not listed as major injury (see above)
Motor vehicle	Any self-propelled means of transportation, heavy equipment and other motor or electrically moveable equipment capable of transporting its operator and workers.
Near miss	Situation with potential negative consequences for the health/safety of the employees, the environment, assets, and reputation of the company.

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Risks and hazards	A hazard is a source or situation that can cause injury or illness to personnel or damage to property and is intrinsically linked with people, equipment, environment, products, and the organization. The risk is the probability or threat of a hazard resulting in an adverse event while causing injury, illness or property damage, damage to the reputation or the service a company provides. Example: Hazard = working at height, Risk = falling.
Working at height	Includes all situations where people are at risk of falling from one level to another and all circumstances where work is executed at height of > 2 m.

1.5 Abbreviations

AED	Automatic External Defibrillator
ASAP	As Soon As Possible
MDR	Master Document Register
EMT/Para	Emergency Medical Team/Paramedic
ERP	Emergency Response Plan
EHS/HSE	Health, Safety & Environment
ERT	Emergency Response Team
EST	Emergency Support Team
FA	Medical Emergency
M.A.R.S.	Modern American Recycling Services
MOB	Man Overboard
NOK	Next of Kin
NORM	Naturally Occurring Radioactive Material
SIS	Danish Health Authority
PoF	Port of Frederikshavn
PPE	Personal Protective Equipment
SOPEP	Ship Oil Pollution Emergency Plan

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2.0 Emergency Procedures

2.1 Contact Information

Emergency number for Frederikshavn is: **112 (Ambulance, Fire Department, Police)**

Addresses for M.A.R.S. Europe Management:

Sandholm 55h, 9900 Frederikshavn (Main Office)

Sandholm 60, 9900 Frederikshavn (Site Office)

Sandholm 55A, 9900 Frederikshavn (Client office/ Changing rooms)

M.A.R.S. Emergency Number:	Site Emergency Guard +45 40 41 81 39
M.A.R.S. EHS Manager:	Alexandru Simion +45 40 41 02 17
M.A.R.S. Site Manager:	Morten H. Knudsen +45 40 41 18 57
M.A.R.S. CEO:	Kim Thygesen +45 53 36 51 79

2.1.1 Management Notification

In all emergencies, Site Emergency Number must be contacted ASAP. This person will then inform the ERT according to Appendix I “Incident Categories” responsibilities.

2.1.2 Client Notification

In case on emergency on an asset, EHS Manager or M.A.R.S Europe’s management is responsible to notify the client representative.

2.1.3 Next of Kin Notification (NOK)

M.A.R.S Europe’s HR department is responsible for NOK notification of the injured person. (M.A.R.S Employees only). For subcontractors, M.A.R.S Europe will notify subcontractor management to assist.

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2.2 General Emergency Guidelines

All emergencies must be immediately reported to the Site Emergency Guard. If is necessary the evacuation of the employees, from the area/asset, the general alarm shall be raised by the team supervisor (or employee/visitors/ if supervisor is not present in the area), and all personnel must report to muster station. The general alarm points are clearly marked, and employees familiarized with their presence and usage. (By conducting drills). A T-card system is monitoring all person on assets, which is installed in the Tally Station. At the muster point, the Site Emergency Guard is recording all person present, by considering the daily site presence (SmarTID), visitor logbook, and the On Scene Commander will coordinate the Search and Rescue operations, in case of a missing person.

2.3 Evacuation from site / buildings

The Site Assembly point (muster station) is clearly marked on site layout plan and is part of the site safety induction presentation. Site layout, buildings plans are presented in Appendix II Site/Building Layouts.

The main office / client office Muster point is in front of the building and is clearly marked with safety signs. A designated person is appointed by EHS Manager, which is assuring that the area was evacuated, and no persons are left behind. The designated person will be trained and familiarized with responsibilities and duties.

2.4 Evacuation from vessels/assets

During “Initial Make Safe” Process, the evacuation routes will be clearly marked, and employees familiarized with the safe evacuation. Safety signs and lights will be installed on evacuation routes. Specific vessels/assets drawings will be presented in Vessel/Asset Specific Emergency Response Plan.

2.5 Incidents

2.5.1 Risk Levels

There are 3 levels of emergency to be used per guidance listed below.

Type <i>(actual/potential)</i>	Level 1	Level 2	Level 3
Personal injury / Incidents	FAID, Near Miss	MTC/RWC High Potential Near Miss	LTI or Fatality

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Type <i>(actual/potential)</i>	Level 1	Level 2	Level 3
Environmental <i>Onsite = all is contained and cleaned, for onshore nothing is permeated into ground or water</i>	-Onsite spill -Mislabelled or miss handled waste	-Spill to environment -mislabelled hazardous waste shipped	-Spills to environment >1000 l -knowingly / willingly harming the environment with the examples of level 3 -incidents with heavy local or any regional environmental impact
Damage <i>(3rd party is, but not limited to, client, subcontractor, port or other vessels)</i>	Damage to asset <30.000 DKK	30.000 DKK < Damage to asset < 1.000.000 DKK	1.000.000 DKK < Damage to asset < 1.000.000 euro Damage to third party assets
Security (ISPS)	Attempt of unauthorised people accessing property	Unauthorised people on property	Attack on site, employees, or assets with malicious intent

All incidents are reported to the EHS Department who records and make incident investigation, reporting to clients and authorities. A copy of incident investigation report will be provided with client, according to the agreement.

A written notification report will be issued to clients within 24 hours for Medical Emergency/near miss/ minor oil spill investigations events, and 12 hours for medical treatment/restricted work case investigation (verbal and written). For formal investigation notification will be issued ASAP via phone, followed by a written email.

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The final investigation report will be issued within 7 days for Medical Emergency /near miss/ minor oil spill, 14 days for medical treatment / restricted work case/ and for formal investigation 1 to 2 months, depending on documenting all events and evidence.

2.5.2 Incident reporting

The observation card system (paper/digital- “Mellora”) is in place for fast reporting an incident. Site supervisors are equipped with work phones with Emergency Guard number, and training was provided with procedures above. All observations are monitored and tracked down, providing inputs for M.A.R.S Europe KPI.

- Report incident/ near miss / unsafe condition immediately to the Site Emergency Guard. (Via phone, face to face discussion, observation card system - paper/ digital)
- Take preventive and damage-limiting measures as soon as possible.

2.5.3 Communication

When reporting an incident, the communication must be clear, repeat the message, and share relevant facts. On the M.A.R.S. site, all supervisors are equipped with a working phone, and on the back of each employee’s I.D. has marked Emergency Guard's names and numbers.

2.6 Emergency Response Teams

M.A.R.S Europe developed emergency response teams for fast reaction in managing emergencies. Further information regarding team members is presented in Appendix I “Incident Categories”. Drills are performed according to annual drill schedule to increase the emergency team reaction. A drill report is completed, with lessons learned and corrective action, if exist.

2.7 Incident Categories

The incident categories are presented in Appendix 1 “Incident Categories”.

Additional to M.A.R.S Europe’s Emergency Spill/ Leak Response team, Semco (M.A.R.S Europe’s Subcontractor) develop an emergency team, ready to take corrective actions. Drills are conducted on regular basis, together with Semco.

2.7.1 Spill/Leak on the ground / Vessel

Additional to M.A.R.S Europe’s Emergency Spill/ Leak Response team, Semco (M.A.R.S Europe’s Subcontractor) develop an emergency team, ready to take corrective actions. Drills are conducted on regular basis, together with Semco. Refer to Chapter 5.1.3.

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2.7.2 NORM Emergency Response

The M.A.R.S. Europe site is in a fenced-off ISPS. area with cameras, lighting, alarm, and two security guards. In addition, a second lockable fence is in place and marks the NORM storage facility within site. Thus, all stored NORM is under double lock and stored in containers, which can be moved by forklift or reach stacker in case of fire or other emergencies. M.A.R.S. Europe site was built as a flood-proof area. Details can be found in C.O.W. I's Environmental Impact Assessment (V.V.M) made for the Municipality of Frederikshavn before the expansion of the harbor. The Environmental Approval issued to M.A.R.S. Europe by the Municipality of Frederikshavn is also mentioning that the area is flood-proof.

Semco, M.A.R.S. Europe's subcontractor are equipped with an on-site emergency response team, for NORM emergencies. M.A.R.S Europe NORM emergency response team will assist / cooperate with Semco NORM Team.

All operations will be performed over the decontamination process/ area. Refer to Chapter 5.1.6.

2.7.3 Ship/Asset Drifting (loose mooring lines)

M.A.R.S Europe is assessing daily the weather condition and prepare for heavy winds / bad weather in advance. A mooring plan will assess the maximum wind and direction which represent a risk for mooring lines. Mooring lines monitoring / checking is M.A.R.S Europe's daily standard practice. CCTV system can always offer, a clear overview of the mooring lines condition, even by nighttime. An agreement was made by M.A.R.S Europe with local tugs company for emergency reason (Svitzer, L&N Supply Ships). Refer to Chapter 5.1.8.

2.7.4 Security breach on Ground / Vessel

The M.A.R.S. Europe site is in a fenced-off ISPS area with CCTV, lighting, alarm, movement sensors, two guards shift and is monitored 24/7 by port authority. The access to the yard is controlled by guards (visitors /cars/trucks) and magnetic ID cards (employees), allowing safe monitoring. Port of Frederikshavn is managing the ISPS regulation on the site. Security rounds are part of M.A.R.S Europe's guards' daily tasks. In case of a security breach on ground level, the alarm will be raised by sensor automatically, and all parties involved will receive a notification on the phone. Refer to Chapter 5.1.9.

3.0 Records

Logs of drills and trainings are recorded in M.A.R.S. Europe Management System.

Emergency teams records are posted on the site Tally Station, vessels/assets Safety Points.

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4.0 Authorization

This procedure must be revised at least every three years.

This procedure is approved by the company EHS Manager.

Alexandru Simion

22.08.2022

EHS Manager

Date



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5.0 APPENDIX


5.1 Appendix I "Incident Categories"

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5.1.1 Fire on the ground level

Fire discoverer (witness)			
Can the fire be extinguished without assistance?	YES	Use fire equipment to extinguish the fire, keep clear of the area	Fire extinguisher, Water Sprayer, Fire Hoses
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Do the process field need to be evacuated? (Due to smoke)	YES	<p>Press the evacuation alarm button</p> <p>Report to Muster station</p>	
	NO	Use fire equipment to extinguish the fire, keep clear of the area	Fire extinguisher, Water Sprayer, Fire hoses
Was the fire extinguished?	YES	Standby in the area to ensure that fire will not start again	15 minutes waiting
	NO	<p>Call emergency number</p> <p>Use fire equipment to extinguish the fire until emergency teams are in the area</p>	Follow steps above

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Emergency Guard Number			
Are Emergency Services (Fire Department) needed?	YES	<p style="text-align: center;">Call Emergency Services (112)</p> <p>Call Duty On-Scene Commander / Fire Tractor / Fire Team / Medic</p>	<p>Information to give:</p> <ul style="list-style-type: none"> • Address (Where the fire has broken out) • What is burning • Number of persons in danger • Point of contact with Emergency Services
	NO	<p style="text-align: center;">Call Duty On-Scene Commander Call Fire Tractor Call Fire Team Members Call Site medic (if needed) POB Control on Site Muster Station</p> <p>Information regarding the fire:</p> <ul style="list-style-type: none"> • Where the fire has broken out/ Project • What is burning • Number of persons in danger • Type of assistance need it • Asset / Vessel evacuated? 	<p>Fire Tractor Team: 00 45 51 81 08 69 Fire Tractor</p> <p>Fire Team: 00 45 40 41 10 19 Fire Team Member 1 00 45 40 41 85 55 Fire Team Member 2 00 45 40 41 12 54 Fire Team Member 3</p> <p>On-Scene Commander: 00 45 29 44 16 22 Commander 1 00 45 30 30 27 64 Commander 2</p> <p>Site Medic: 00 45 40 41 18 57</p>
Are Emergency Services (Fire Department) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the fire location	Create safe corridor(access) for Emergency Services Update Emergency Services with additional data Point of contact with Emergency Services
	NO	Guide Fire Tractor Team to the fire location	Point of contact with Fire Tractor Team Muster station counter (Count POB)
Inform M.A.R.S Management about Fire	YES	Notify M.A.R.S. Management about the Fire Continuous Updates from the area	00 45 40 41 10 19 EHS office
Inform M.A.R.S Supervisors about Fire	YES	Notify Site Supervisors about the Fire	Radio Channel 1

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On-Scene Commander (Assembly in max 5 minutes)

Command / Coordinate the site fire extinguishing operations	YES	Report to Fire area (Wear the On-Scene Commander Visible Vest) Evacuate the area Take control of the operations Assess the event needs Coordinate crane/excavator assistance (if needed) Provide additional fire equipment's, if needed Coordinate with Site Medic	Radio Channel 1
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Direct communication with Fire Tractor Team / Fire Team	YES	Continuous update regarding the event Coordinate the Fire Tractor Team / Fire Team Provide additional fire equipment's, if needed	Radio Channel 1
Ensure that the fire area is clear	YES	Monitor the barrier (Install additional barriers) Assess the weather condition (Wind)	Evacuate the adjacent area where smoke present a risk

Fire Tractor Team (Assembly in max 5 minutes)

Fire Tractor Team	YES	Fire Tractor Member 1: Storekeeper Fire Tractor Member 2: Maintenance	00 45 51 81 08 69 00 45 40 12 97 84
Report to fire tractor station	YES	Start Fire Tractor (5 minutes KPI) Communicate with On-Scene Commander	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1

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Extinguish the fire / Limit the spread of fire	YES	Use fire equipment available	Fire Tractor
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill tractor's water tank Check equipment integrity	

Fire Team (Assembly in max 10 minutes)			
Fire Team Members	YES	Fire Team Member 1 Fire Team Member 2 Fire Team Member 3 Fire Team Member 4	00 45 40 41 85 55 00 45 40 41 10 19 00 45 40 41 12 54 00 45 40 41 02 31
Report to fire station	YES	Equip with fire equipment (5 minutes KPI) Communicate with On-Scene Commander	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Extinguish the fire / Limit the spread of fire	YES	Use fire equipment available	Fire extinguisher, Fire Blankets, Fire Hose, Water Sprayer
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill BA Bottles Check equipment integrity Arrange equipment in the Fire Station	

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Site Medic (Assembly in max 10 minutes)			
Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with On-Scene Commander	Radio Channel 1
Assist On-Scene Commander	YES	Stand-by in the fire area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Check the Tally Station POB	YES	Start Search for missing persons Process Report to Emergency Number Guard	00 45 40 41 81 39 Radio Channel 1


EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the fire area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting

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5.1.2 Fire on the assets /Vessels

Fire discoverer (witness)			
Can the fire be extinguished without assistance?	YES	Use fire equipment to extinguish the fire, keep clear of the area	Fire extinguisher, Water Sprayer, Fire Hoses
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Do the process field need to be evacuated? (Due to smoke)	YES	Press the evacuation alarm button Report to Muster station	
	NO	Use fire equipment to extinguish the fire, keep clear of the area	Fire extinguisher, Water Sprayer, Fire hoses
Was the fire extinguished?	YES	Standby in the area to ensure that fire will not start again	15 minutes waiting
	NO	Call emergency number Use fire equipment to extinguish the fire until emergency teams are in the area	Follow steps above

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Emergency Guard Number			
Are Emergency Services (Fire Department) needed?	YES	<p style="text-align: center;">Call Emergency Services (112)</p> <p style="text-align: center;">Call Duty On-Scene Commander / Fire Team / Medic</p>	<p>Information to give:</p> <ul style="list-style-type: none"> Address (Where the fire has broken out) What is burning Number of persons in danger Point of contact with Emergency Services
	NO	<p style="text-align: center;">Call Duty On-Scene Commander Call Fire Team Members Call Site medic (if needed) POB Control on Site Muster Station</p> <p>Information regarding the fire:</p> <ul style="list-style-type: none"> Where the fire has broken out/ Project What is burning Number of persons in danger Type of assistance need it Asset / Vessel evacuated? 	<p>Fire Team:</p> <p style="background-color: green; color: black;">00 45 40 41 10 19</p> Fire Team Member 1 style="background-color: green; color: black;">00 45 40 41 85 55 Fire Team Member 2 style="background-color: green; color: black;">00 45 40 41 12 54 Fire Team Member 3
Are Emergency Services (Fire Department) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the fire location	Create safe corridor(access) for Emergency Services Update Emergency Services with additional data Point of contact with Emergency Services
	NO	Guide Fire Team to the fire location	Point of contact with Fire Team Muster station counter (Count POB)
Inform M.A.R.S Management about Fire	YES	Notify M.A.R.S. Management about the Fire Continuous Updates from the area	00 45 40 41 10 19
Inform M.A.R.S Supervisors about Fire	YES	Notify Site Supervisors about the Fire	Radio Channel 1

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On-Scene Commander (Assembly in max 5 minutes)			
Command / Coordinate the site fire extinguishing operations	YES	Report to Fire area (Wear the On-Scene Commander Visible Vest) Evacuate the area Take control of the operations Assess the event needs Coordinate crane/excavator assistance (if needed) Provide additional fire equipment's, if needed Coordinate with Site Medic	Radio Channel 1
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Direct communication with Fire Team	YES	Continuous update regarding the event Coordinate the Fire Team Provide additional fire equipment's, if needed	Radio Channel 1
Ensure that the fire area is clear	YES	Monitor the barrier (Install additional barriers) Assess the weather condition (Wind)	Evacuate the adjacent area where smoke present a risk

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Fire Team (Assembly in max 10 minutes)			
Fire Team Members	YES	Fire Team Member 1 Fire Team Member 2 Fire Team Member 3 Fire Team Member 4	00 45 40 41 85 55 00 45 40 41 10 19 00 45 40 41 12 54 00 45 40 41 02 31
Report to fire station	YES	Equip with fire equipment (5 minutes KPI) Communicate with On-Scene Commander	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Extinguish the fire / Limit the spread of fire	YES	Use fire equipment available	Fire extinguisher, Fire Blankets, Fire Hose, Water Sprayer
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill BA Bottles Check equipment integrity Arrange equipment in the Fire Station	

Site Medic (Assembly in max 10 minutes)			
Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with On-Scene Commander	Radio Channel 1
Assist On-Scene Commander	YES	Stand-by in the fire area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Check the Tally Station POB	YES	Start Search for missing persons Process Report to Emergency Number Guard	00 45 40 41 81 39 Radio Channel 1


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EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the fire area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting


5.1.3 Spill / Leak on the Ground / Vessel

Spill / Leak discoverer (witness)			
Can the spill / leak be contained without Emergency Spill Response Team) assistance?	YES	Use SOPEP equipment (Yellow bins on the ground/vessels)	Gloves, suites, rags, sand, oil absorbents 

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	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Does the area need to be evacuated?	YES	Press the evacuation alarm button	
		Report to Muster station	
	NO	Use SOPEP equipment (Yellow bins on the ground/vessels)	Gloves, suites, rags, sand, oil absorbents
Was the spill / leak was contained?	YES	Ensure the area is cleaned	No residues left in the area
	NO	Use SOPEP equipment (Yellow bins on the ground/vessels)	Gloves, suites, rags, sand, oil absorbents

Emergency Number Guard			
Are Emergency Services (Authorities) needed?	YES	<p>Call Emergency Services (112)</p> <p>Call Site Spill Emergency Response Team to assist</p>	<p>Information to give:</p> <ul style="list-style-type: none"> • Address (Where the spill/leak happened) • Type of the accident • Number of persons in danger • Point of contact with Emergency Services
	NO	<p>Call Duty On-scene Commander</p> <p>Call Site Spill Emergency Response Team</p> <p>Information regarding the spill / leak:</p> <ul style="list-style-type: none"> • Where the spill /leak happened • Type of the accident • Number of persons in danger • Type of assistance need it • Asset / Vessel evacuated? 	<p>Spill Response Team:</p> <p>00 45 40 41 02 31 Spill Team Member 1</p> <p>00 45 40 13 16 79 Spill Team Member 2</p> <p>On-Scene Commander:</p> <p>00 45 29 44 16 22 Commander 1</p> <p>00 45 30 30 27 64 Commander 2</p> <p>Site Medic:</p> <p>00 45 40 41 18 57</p>
	YES	Guide Emergency Services to the Spill/ Leak location	Create safe corridor(access) for Emergency Services

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Are Emergency Services (Authorities) on M.A.R.S Europe Site?	NO	Guide Site Spill Emergency Response Team to the spill/leak location	Update Emergency Services with additional data Contact point with Emergency Services
Inform M.A.R.S Management about Leak/Spill	YES	Notify M.A.R.S. Management about the Spill / Leak Continuous Updates from the area	Update Emergency Services with additional data Contact Point with Site Emergency Response Team. Muster station counter (Count POB) EHS Manager: 00 45 40 41 02 17
Inform M.A.R.S Supervisors about Leak / Spill	YES	Notify Site Supervisors about the Spill / Leak	Radio Channel 1

On-Scene Commander (Assembly in max 10 minutes)

Command / Coordinate the site spill/leak operations	YES	Report to spill/leak area (On Scene Commander Vest) Take control of the operations Assess the event needs Coordinate crane/excavator assistance Provide additional SOPEP equipment's, if needed Coordinate Spill Response Team / Site Medic	Radio Channel 1
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Ensure that the spill/leak area is clear	YES	Monitor the barrier (Install additional barriers) Assess the weather condition	

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Spill Response Team (Assembly in max 10 minutes)

Spill Response Team	YES	Spill Team Member 1 Spill Team Member 2	00 45 40 41 02 31 00 45 40 13 16 79
Report to spill /leak location	YES	Present on the spill/leak area (5 minutes KPI) Communicate with On-Scene Commander Ensure SOPEP kits are on the locatio	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Limit / Contain the spread of leak/spill	YES	Use SOPEP equipment available	Tally Station, Safety Cabinets, Yellow containers
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill SOPEP kits Check equipment integrity	

Site Medic (Assembly in max 10 minutes)

Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with On-Scene Commander	Radio Channel 1
Assist On-Scene Commander	YES	Stand-by in the spill/leak area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Record event timeline	YES	Log event relevant timeline Report as observation Card	“Mellora” Observation Card System

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EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the leak / spill area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting

5.1.4 Medical Emergencies on the Ground / Vessel

Medical Emergency discoverer (witness)			
Can the Medical Emergency be applied by discoverer (witness) on the area?	YES	Apply Medical Emergency	Use Medical Emergency kits (Safety Cabinets / Tally Station)
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Can the injured person be moved to Site Medic Container?	YES	Assist injured person to be moved to Site Medic Container	Don't leave the injured person alone
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Does the injured person need to be evacuated to the hospital?	YES	Call emergency number (Give clear information, informing that emergency services are needed)	00 45 40 41 81 39

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	NO	Apply Medical Emergency	Medical Emergency Kits
Was the Medical Emergency applied?	YES	Standby with injured person until is fully recovered (if needed)	30 minutes waiting
	NO	Follow steps above	
Can the injured person resume work?	YES	Inform Team supervisor about Medical Emergency applied	Contact team supervisor
	NO	Call emergency number (Give clear information)	Follow steps above

Emergency Number Guard

Are Emergency Services (Ambulance/Paramedic) needed?	YES	<p>Call Emergency Services (112)</p> <p>Call Site Medic</p>	<p>Information to give:</p> <ul style="list-style-type: none"> Address (Where the Medical Emergency has happened) What is the injury Number of persons in danger Point of contact with Emergency Services
	NO	<p>Call Site Medic</p> <p>Information regarding the Medical Emergency</p>	<p>Site Medic: 00 45 40 41 18 57</p> <p>Information to give:</p> <ul style="list-style-type: none"> Where the Medical Emergency has happened What is the injury Number of persons in danger Type of assistance need it Injured person needs evacuation from area?
Are Emergency Services (Ambulance/Paramedic) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the Medical Emergency location	<p>Create safe corridor(access) for Emergency Services</p> <p>Update Emergency Services with additional data</p> <p>Contact point with Emergency Services</p>

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	NO	Guide Site Medic to Medical Emergency location	Update Emergency Services with additional data Contact Point with Site Medic.
Inform M.A.R.S Management about Medical Emergency	YES	Notify M.A.R.S. Management about the Medical Emergency Continuous Updates from the area	EHS Manager: 00 45 40 41 02 17
Inform M.A.R.S Supervisors about Medical Emergency	YES	Notify Site Supervisors about the Medical Emergency	Radio Channel 1

Site Medic (Assembly in max 10 minutes)			
Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with Emergency Number Guard	Radio Channel 1
Applied Medical Emergency on the location for the injured person	YES	Communicate with Emergency Number Guard	Radio Channel 1
Cooperate with Emergency Services (Ambulance/Paramedic) (if exist)	YES	Assist / Support Emergency Services on the area	Direct Communication
Coordinate the Medical Emergency Stretcher Team	YES	Communicate / guide Stretcher Team	Direct Communication, Radio Channel 1
Coordinate with On-Scene Commander (if exist, depending on emergency)	YES	Communicate Needs on Crane, Man-basket	Radio Channel 1
Check Medical Emergency equipment after usage	YES	Refill used equipment Update inventory list	Radio Channel 1
Record/ Report the Medical Emergency	YES	Update the Medical Emergency list Observation Card	“Mellora” Observation Card System

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Medical Emergency Stretcher Team (Assembly in max 10 minutes)

Medical Emergency Stretcher Team	YES	Stretcher Team Leader: Cleaner Stretcher Team Members	00 45 40 41 02 31
Report to Medical Emergency Point	YES	(5 minutes KPI) Communicate with Site Medic	Radio Channel 1
Cooperate with the Site Medic	YES	Continuous update from the area Assist Site Medic	Radio Channel 1
Stretcher on the Medical Emergency Point	YES	Use Stretcher	Use stretcher for the location area or from Site Ambulance
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Check equipment after usage	YES	Check equipment integrity	

EHS Manager (Assembly in max 10 minutes)

Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the Medical Emergency area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting

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5.1.5 Rescue from Confined Space / Work at height

Discoverer (witness)			
Can the person in danger, be rescued without assistance? (DO NOT go inside of confined space, without proper equipment)	YES	Use rescue equipment (Emergency equipment station)	Safety Harness, Ladders
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39
Does the person in danger needs external emergency services	YES	Call emergency number (Specify the needs of external emergency services)	00 45 40 41 81 39
	NO	Call emergency number (Give clear information)	00 45 40 41 81 39

Emergency Number Guard			
Are Emergency Services (Ambulance / Fire Department) needed?	YES	<p>Call Emergency Services (112)</p> <p>Call Site Emergency Response Team to assist</p>	<p>Information to give:</p> <ul style="list-style-type: none"> Address (Where the event has happened) Type of event Number of persons in danger Point of contact with Emergency Services
	NO	<p>Call Site Emergency Response Team</p> <p>Information to give:</p> <ul style="list-style-type: none"> Where the event has happened Type of event Number of persons in danger Type of assistance need it 	<p>Emergency Team:</p> <p>00 45 40 41 10 19 Team Member 1</p> <p>00 45 40 41 85 55 Team Member 2</p> <p>00 45 40 41 12 54 Team Member 3</p> <p>On-Scene Commander:</p> <p>00 45 29 44 16 22 Commander 1</p> <p>00 45 30 30 27 64 Commander 2</p> <p>Site Medic:</p> <p>00 45 40 41 18 57</p>
	YES	Guide Emergency Services to the event location	Create safe corridor(access) for Emergency Services

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Are Emergency Services (Ambulance / Fire Department) on M.A.R.S Europe Site?	NO	Guide Site Emergency Response Team to the event location	Update Emergency Services with additional data Contact point with Emergency Services
Inform M.A.R.S Management about event	YES	Notify M.A.R.S. Management about the event Continuous Updates from the area	Update Emergency Services with additional data Contact Point with Site Emergency Response Team. EHS Manager: 00 45 40 41 02 17
Inform M.A.R.S Supervisors about event	YES	Notify Site Supervisors about the event	Radio Channel 1

On-Scene Commander (Assembly in max 10 minutes)			
Command / Coordinate the event operations	YES	Report to event area (On-scene Commander Vest) Take control of the operations Assess the event needs Coordinate crane assistance / man basket Provide additional rescue equipment's, if needed Coordinate with Site Medic	Radio Channel 1
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Direct communication with Emergency Team Members	YES	Continuous update regarding the event Coordinate the Emergency Team Members Provide additional rescue equipment's, if needed	Radio Channel 1
Ensure that the event area is clear	YES	Monitor the barrier (Install additional barriers)	

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Emergency Team (Assembly in max 10 minutes)

Emergency Team Members	YES	Team Member 1 Team Member 2 Team Member 3 Team Member 4	00 45 40 41 85 55 00 45 40 41 10 19 00 45 40 41 12 54 00 45 40 41 02 31
Report to emergency equipment station	YES	Equip with rescue equipment (5 minutes KPI) Communicate with On-Scene Commander Tripod, Rescue Kits Rescue equipment's (in site ambulance car)	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Rescue the person in danger	YES	Use rescue equipment available	Tripods, ladders, BA sets, stretcher, safety harness
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill BA Bottles Check equipment integrity Arrange equipment in the Emergency equipment Station	

Site Medic (Assembly in max 10 minutes)

Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with On-Scene Commander	Radio Channel 1
Assist On-Scene Commander	YES	Stand-by in the event area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Record event timeline	YES	Log event relevant timeline Report as observation Card	"Mellora" Observation Card System

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EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard Check POB	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the event area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting


5.1.6 NORM Emergency Response

NORM discoverer (witness)			
NORM incident (NORM Contamination, fire in NORM area, accidental radiation, environmental pollution)	YES	Call emergency number (Give clear information) Information to give:	<p>00 45 40 41 81 39</p> <ul style="list-style-type: none"> Address (Where the incident has happened) <ul style="list-style-type: none"> Type of incident Number of persons in danger

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Evacuate the area	YES	Press the evacuation alarm button Report to Muster station	
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Emergency Number Guard			
Are Emergency Services (Ambulance/Paramedic, Fire Department) needed?	YES	<p style="text-align: center;">Call Emergency Services (112)</p> <p style="text-align: center;">Call Site Medic</p>	<p>Information to give:</p> <ul style="list-style-type: none"> • Address (Where the incident has happened) • Type of incident (Refer to NORM) • Number of persons in danger • Point of contact with Emergency Services
	NO	<p style="text-align: center;">Call Site Medic</p> <p style="text-align: center;">Call Duty On-Scene Commander</p> <p style="text-align: center;">Call Site NORM Emergency Response Team</p> <p style="text-align: center;">Information to give:</p> <ul style="list-style-type: none"> • Address (Where the incident has happened) • Type of incident • Number of persons in danger • Point of contact with Emergency Services 	<p>Site Medic: 00 45 40 41 18 57</p> <p>On-Scene Commander: 00 45 29 44 16 22 Commander 1 00 45 30 30 27 64 Commander 2</p> <p>NORM Emergency Response Team: 00 45 40 41 10 19 NORM Team Member 1 00 45 40 41 85 55 NORM Team Member 2 00 45 40 41 12 54 NORM Team Member 3 00 45 40 41 02 31 NORM Team Member 4</p>
Are Emergency Services (Ambulance/Paramedic, Fire Department) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the incident location	<p>Create safe corridor(access) for Emergency Services</p> <p>Update Emergency Services with additional data</p> <p>Contact point with Emergency Services</p>

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	NO	Guide Site Medic / NORM Emergency response team to the incident	Update Emergency Services with additional data Contact Point with Site Medic.
Inform M.A.R.S Management about NORM Incident	YES	Notify M.A.R.S. Management about the NORM incident Continuous Updates from the area	EHS Manager: 00 45 40 41 02 17
Inform M.A.R.S Supervisors about NORM Incident	YES	Notify Site Supervisors about the NORM incident	Radio Channel 1

On-Scene Commander (Assembly in max 10 minutes)

Command / Coordinate the site NORM operations	YES	Report to area (On-scene Commander Vest) Take control of the operations Assess the event needs Cooperate with Semco NORM Team Coordinate required assistance Provide additional equipment's, if needed Coordinate with Site Medic Call S.I.S. (The National Board of Health Radiation Protection)	Radio Channel 1 00 45 44 94 37 73
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Check the Tally Station POB	YES	Search for missing persons Report to Emergency Number Guard	00 45 40 41 81 39 Radio Channel 1
Direct communication with NORM Team Members	YES	Continuous update regarding the event Coordinate the NORM Team Members Provide additional equipment's, if needed	Radio Channel 1

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Ensure that the incident area is clear	YES	Monitor the barrier (Install additional barriers) Assess the weather condition (Wind)	
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NORM Team (Assembly in max 10 minutes)

NORM Team Members	YES	NORM Team Member 1 NORM Team Member 2 NORM Team Member 3 NORM Team Member 4	00 45 40 41 85 55 00 45 40 41 10 19 00 45 40 41 12 54 00 45 40 41 02 31
Report to NORM station	YES	Equip with NORM equipment (5 minutes KPI) Fresh air supply (BA sets) Communicate with On-Scene Commander	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Assist with NORM containment Removed injured persons	YES	Use equipment available	
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Refill BA Bottles Check equipment integrity Arrange equipment in the NORM Station	

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Site Medic (Assembly in max 10 minutes)

Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with Emergency Number Guard	Radio Channel 1
Applied Medical Emergency on the location for the injured person (Only with proper PPE, and after decontamination area) (if needed)	YES	Communicate with Emergency Number Guard	Radio Channel 1
Cooperate with Emergency Services (Ambulance/Paramedic, Fire Department) (if exist)	YES	Assist / Support Emergency Services on the area	Direct Communication
Coordinate with On-Scene Commander (if exist, depending on emergency)	YES	Communicate Needs on Crane, Man-basket	Radio Channel 1
Check Medical Emergency equipment after usage	YES	Refill used equipment Update inventory list	Radio Channel 1
Check the Tally Station POB	YES	Search for missing persons Report to Emergency Number Guard	00 45 40 41 81 39 Radio Channel 1

EHS Manager (Assembly in max 10 minutes)

Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist On-Scene Commander / Medic	YES	Stand-by in the Medical Emergency area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1

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Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting

5.1.7 Man overboard (MOB)

Discoverer (witness)			
Can the discoverer (witness) help person in danger?	YES	Throw lifebuoy, lifejacket, lanyard	Lifebuoy, Lifejacket close to the mooring area
		Call emergency number (Give clear information)	00 45 40 41 81 39
Person in danger is equipped with lifesaving appliances (lifejacket)	YES	Assist person in danger	Keep eye contact with person in danger
	NO	Throw lifebuoy, lifejacket, lanyard Call emergency number (Give clear information)	00 45 40 41 81 39
Does the person in danger need to be evacuated to the hospital?	YES	Call emergency number (Give clear information, informing that emergency services are needed)	00 45 40 41 81 39
	NO	Apply Medical Emergency	Medical Emergency Kits
Was the person in danger rescued?	YES	Standby until is fully recovered (if needed) Visit Site Medic	
	NO	Follow steps above	Keep eye contact with person in danger

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Emergency Number Guard			
Are Emergency Services (Ambulance/Paramedic, Fire Department) needed?	YES	<p>Call Emergency Services (112)</p> <p>Call On-Scene Commander Call Site Medic Call MOB Response Team</p>	<p>Information to give:</p> <ul style="list-style-type: none"> Address (Where the event has happened) What is the injury Number of persons in danger Point of contact with Emergency Services
	NO	<p>Call On-Scene Commander Call MOB Response Team Call Site Medic</p> <p>Information regarding the MOB</p> <ul style="list-style-type: none"> Where the event has happened What is the injury Number of persons in danger Type of assistance need it 	<p>On-Scene Commander:</p> <p>00 45 29 44 16 22 Commander 1 00 45 30 30 27 64 Commander 2 MOB Team Leader 00 45 93 90 88 94 Site Medic: 00 45 40 41 18 57</p>
Are Emergency Services (Ambulance/Paramedic, Fire Department) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the MOB location	<p>Create safe corridor(access) for Emergency Services Update Emergency Services with additional data Contact point with Emergency Services</p>
	NO	Guide MOB Team Leader / Site Medic to MOB location	<p>Update Emergency Services with additional data Contact Point with Site Medic/ MOB Team Leader</p>
Inform M.A.R.S Management about MOB	YES	Notify M.A.R.S. Management about the MOB Continuous Updates from the area	<p>EHS Manager: 00 45 40 41 02 17</p>
Inform M.A.R.S Supervisors about MOB	YES	Notify Site Supervisors about the MOB	Radio Channel 1

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MOB Response Team (Assembly in max 10 minutes)

MOB Response Team	YES	MOB Team Leader MOB Team Member 1 MOB Team Member 2	00 45 93 90 88 94
Report to MOB location	YES	Deploy MOB Boat (5 minutes KPI) Communicate with Emergency Number Guard	Radio Channel 1
Rescue person in danger	YES	Rescue Equipment (Nets, Hook) Medical Emergency	MOB boat equipment Medical Emergency kit
Cooperate with Emergency Services	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Check equipment after usage	YES	MOB equipment Check equipment integrity Clean MOB Boat	

Site Medic (Assembly in max 10 minutes)

Report to the Medical Emergency Van (Site Ambulance)	YES	Check Medical Emergency equipment Communicate with Emergency Number Guard	Radio Channel 1
Applied Medical Emergency on the location for the person in danger (if needed)	YES	Communicate with Emergency Number Guard	Radio Channel 1
Cooperate with Emergency Services (Ambulance/Paramedic) (if exist)	YES	Assist / Support Emergency Services on the area	Direct Communication
Coordinate with MOB Team Leader	YES	Communicate / Assist with Medical Emergency	Radio Channel 1
Check Medical Emergency equipment after usage	YES	Refill used equipment Update inventory list	Radio Channel 1


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EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Assist MOB Team leader / Medic	YES	Stand-by in the Medical Emergency area Ready to apply Medical Emergency treatment, if needed	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Meeting with Emergency Services / Site Emergency Response Team	YES	Feedback and Lesson Learned	On site planned meeting

5.1.8 Vessel/Asset Drifting (Loose Mooring lines)

Vessel/Asset Drifting Discoverer (witness)			
Mooring failure	YES	Call emergency number (Give clear information)	00 45 40 41 81 39
Vessel (asset) needs to be evacuated?	YES	Press the evacuation alarm button Report to Muster station (Evacuate the platform only if is safe)	

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Emergency Number Guard			
Call emergency teams	YES	<p>Call Site Mooring Emergency Response Team Call On-Scene Commander Call Site medic (if needed)</p> <p>Information regarding the Mooring Failure:</p> <ul style="list-style-type: none"> • Where the mooring line has broken out • How many mooring lines failure? • Number of persons in danger • Type of assistance need it • Asset / Vessel evacuated? 	<p>00 45 93 90 88 94 Mooring Team Leader 00 45 30 30 27 64 On-Scene Commander 00 45 40 41 18 57 Site Medic</p>
Are Svitzer, L&N Supply Ships on M.A.R.S Europe Site?	YES	Guide Svitzer, L&N Supply Ships to mooring failure area	Create safe corridor(access) for Emergency Services Update Emergency Services with additional data Point of contact with Emergency Services
	NO	Guide Site Mooring Emergency Response Team	Point of contact with Mooring Failure Team Leader
Inform M.A.R.S Management about event	YES	Notify M.A.R.S. Management about the event Continuous Updates from the area	00 45 40 41 10 19 EHS office
Inform M.A.R.S Supervisors about event	YES	Notify Site Supervisors about the event	Radio Channel 1

On-Scene Commander (Assembly in max 5 minutes)			
Command / Coordinate the mooring operations	YES	<p>Report to mooring failure area Take control of the operations Assess the event needs Coordinate crane/excavator/Stucker assistance (if needed) Provide additional mooring equipment Coordinate with Emergency Services (Svitzer, L&N Supply Ships) Assess weather condition (wind, waves)</p>	Radio Channel 1

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Are Svitzer, L&N Supply Ships needed?	YES	Call Emergency Services (Svitzer, L&N Supply Ships) for tug assistance Call Site Mooring Emergency Response Team to assist	Information to give: <ul style="list-style-type: none"> Address (Where the mooring line has broken out) How many mooring lines failure? Number of persons in danger Point of contact with Emergency Services
Cooperate with Emergency Services (Svitzer, L&N Supply Ships)	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Direct communication with Emergency Number Guard	YES	Continuous update regarding the event Notify if Emergency Services are needed	00 45 40 41 81 39 Radio Channel 1
Direct communication with Mooring Failure Team	YES	Continuous update regarding the event Coordinate the Mooring Failure Team Provide additional mooring equipment's	Radio Channel 1
Ensure that the area is clear	YES	Monitor the barrier (Install additional barriers) Assess the weather condition (Wind)	Evacuate the adjacent area, if needed

Mooring Team (Assembly in max 10 minutes)			
Mooring Team	YES	Mooring Failure Team Leader: Mooring Failure Member 1 Mooring Failure Member 2 Mooring Failure Member 3 Mooring Failure Member 4	00 45 93 90 88 94
Report to mooring failure area	YES	Start mooring operation (5 minutes KPI) Communicate with On-Scene Commander	Radio Channel 1
Direct communication with On-Scene Commander	YES	Continuous update from the area Request for assistance, if needed	Radio Channel 1
Install / reinforce mooring arrangements	YES	Use spare mooring lines	Workshop

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Cooperate with Emergency Services (Svitzer, L&N Supply Ships)	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site
Ensure that area is safe for resuming operations	YES	Monitor the area and existing risks Communicate with On-Scene Commander	Radio Channel 1
Check equipment after usage	YES	Check equipment integrity Check mooring lines	

EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Coordinate with On-Scene Coordinator	YES	Conduct investigation	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event Conduct investigation	
Assist Emergency Services (Svitzer, L&N Supply Ships)	YES	Feedback and Lesson Learned	On site planned meeting

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5.1.9 Security breach on Ground / Vessel

Discoverer (witness)			
Security breach was observed	YES	Call emergency number (Give clear information)	00 45 40 41 81 39

Emergency Number Guard			
Are Emergency Services (Police) needed?	YES	Call Emergency Services (112) Call EHS Manager Information to give: <ul style="list-style-type: none"> Address (Where has happened) Number of persons in danger Point of contact with Emergency Services 	EHS Manager: 00 45 40 41 02 17
	NO	Call Site Manager Information regarding the Security Breach	Site Manager: 00 45 40 41 18 57
Are Emergency Services (Police) on M.A.R.S Europe Site?	YES	Guide Emergency Services to the Security Breach location	Create safe corridor(access) for Emergency Services Update Emergency Services with additional data Contact point with Emergency Services
	NO	Guide Site Manager to Security Breach location	Update Emergency Services with additional data Contact Point with Site Medic.
Inform M.A.R.S Management about Security Breach	YES	Notify M.A.R.S. Management about the Security Breach Continuous Updates from the area	EHS Manager: 00 45 40 41 02 17

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EHS Manager (Assembly in max 10 minutes)			
Report to the site area	YES	Direct communication with Emergency Number Guard	00 45 40 41 81 39
Notify Senior Management	YES	Brief description of the event Event Status	Phone
Coordinate with Site Manager	YES	Conduct investigation	Radio Channel 1
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Start Event Investigation	YES	Collect evidence, witness statement, map event	
Assist Emergency Services (Police)	YES	Conduct investigation Collect witness statement / proofs Feedback and Lesson Learned	On site planned meeting

5.1.10 Infectious Disease

Infectious Disease Response Team (Assembly in max 1 hour)			
Infectious Disease Response Team	YES	Infectious Disease Team Leader (HR) Infectious Disease Team Member 1 (HR) Infectious Disease Team Member 2 (Site Medic)	00 45 30 30 77 63 00 45 40 41 04 63 00 45 40 41 18 57
Meeting to evaluate the Infectious Disease risk and mitigating actions	YES	Communicate with CEO	Direct Communication on site/ office
Meeting to inform site management / EHS	YES	Communicate with site managers	Direct Communication on site/ office
Cooperate with Emergency Services (if needed)	YES	Assist / Support Emergency Services on the area Guide Emergency Services on the area	Direct Communication on site

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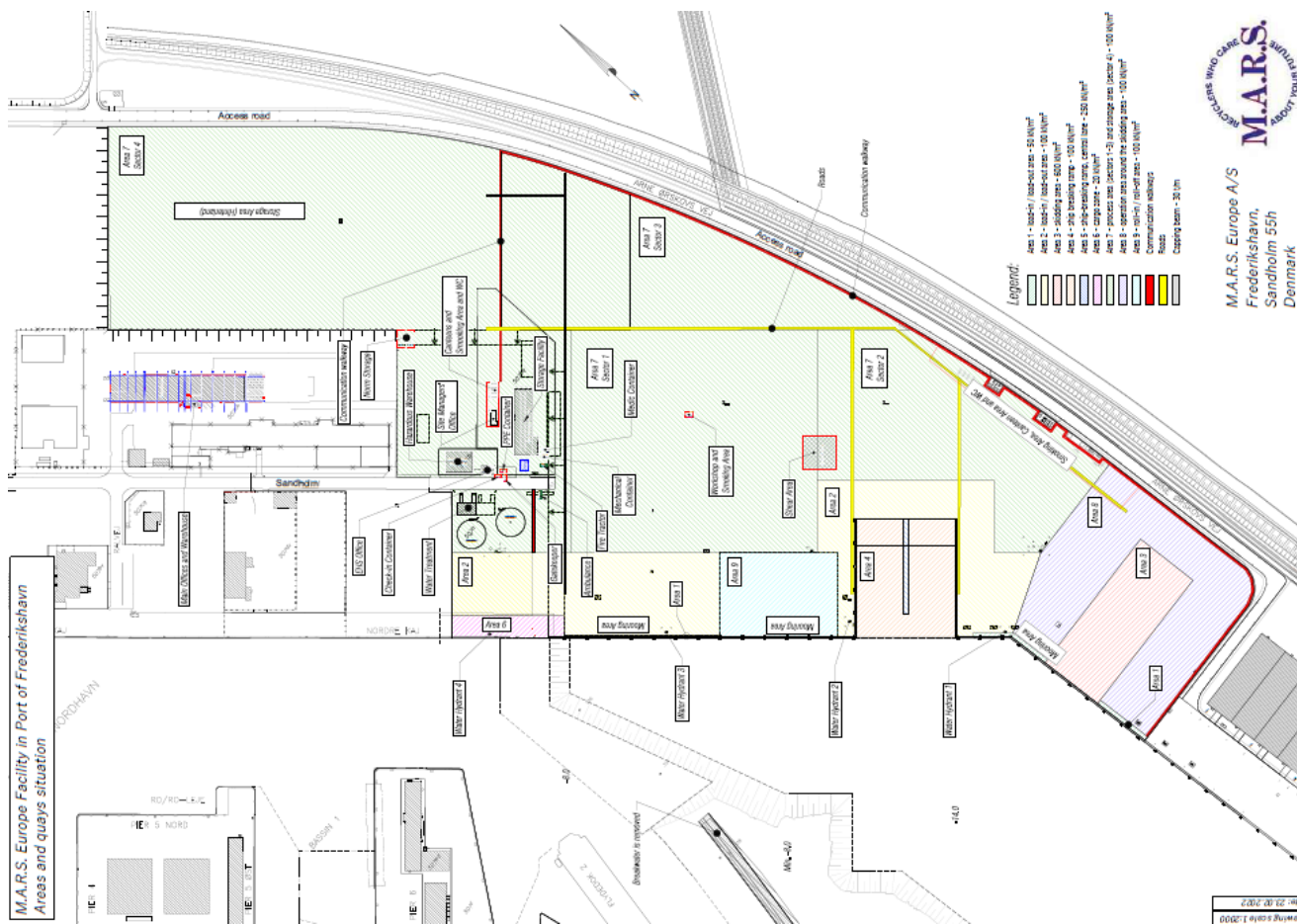
EHS Manager (Assembly in max 1 hour)			
Notify Client Representative	YES	Brief description of the event Event Status	Phone / E-mail (As per Project EHS Plan)
Meeting with Infectious Disease Response Team	YES	Procedures development Action plan	On site/office planned meeting
Coordinate restrictive measures into the field (if needed)	YES	Corrective measures	On site/office

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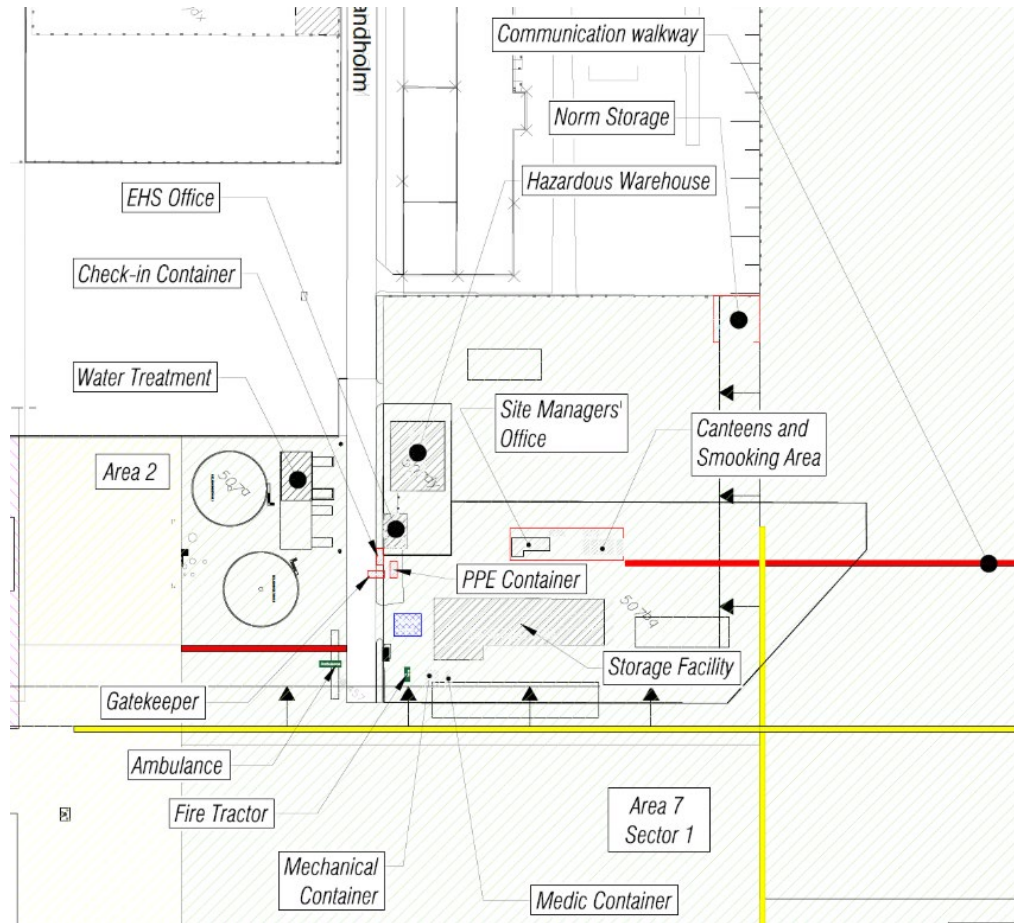
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5.2 Appendix II “Site/Building layout”

5.2.1 Site Layout



5.2.2 Site Office Layouts / Rescue Equipment



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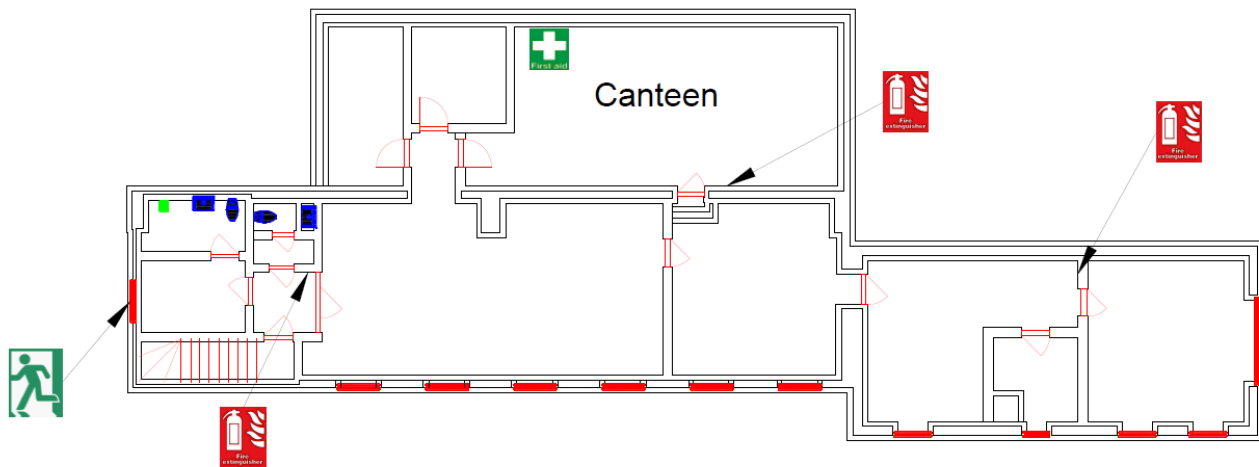
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5.2.3 Main Office Layout

Sandholm 55H

1st Floor - Admin Office



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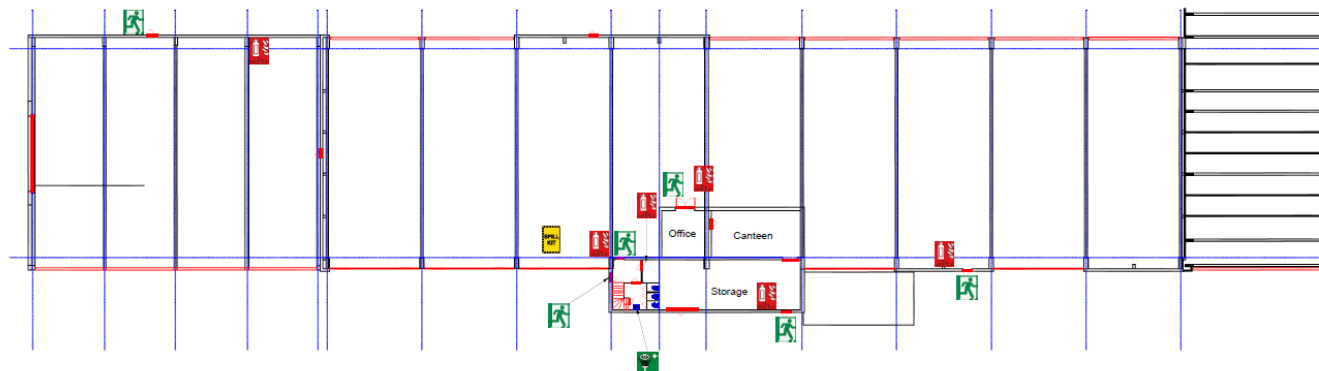
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5.2.4 Warehouse Layout

Sandholm 55H

Ground Floor - Warehouse, Office & Canteen



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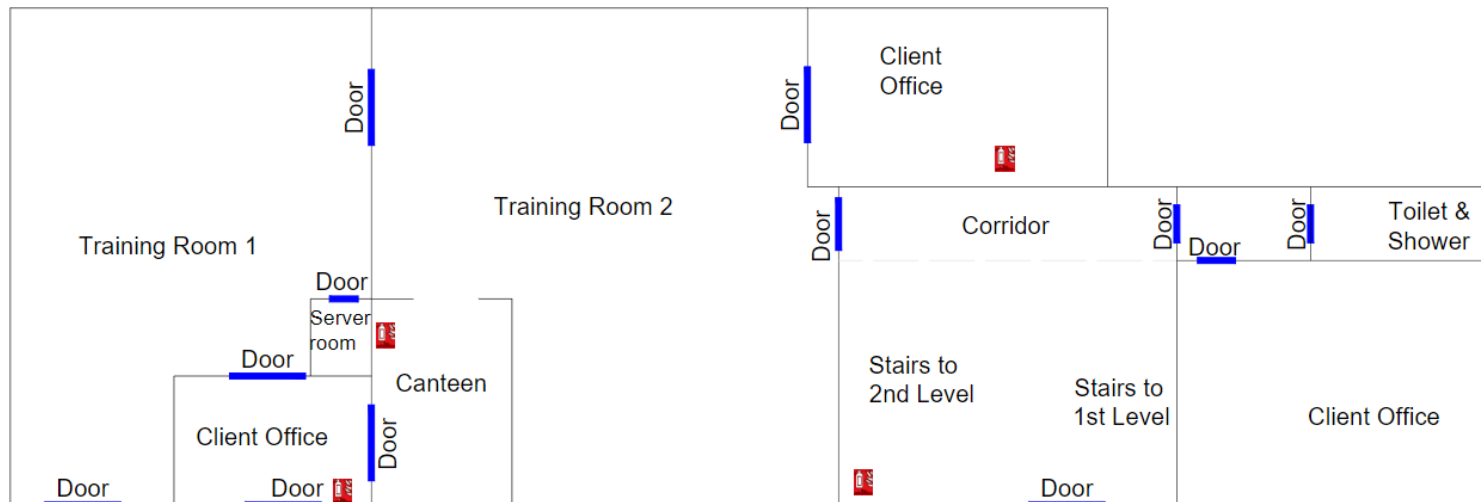
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5.2.5 Client Office Layout

Sandholm Changing Room / Clients Office Building

Clients Office (2nd Level)



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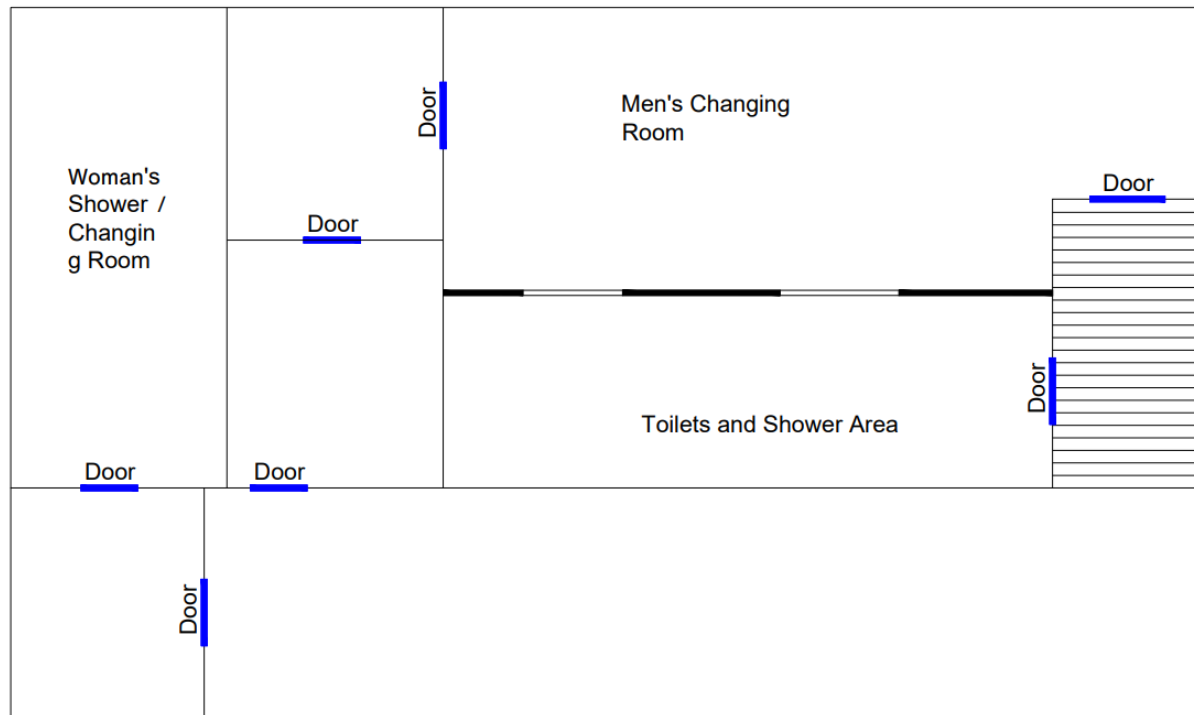
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5.2.6 Changing rooms Layout

Sandholm Changing Room / Clients Office Building

Changing Room Area (1st Level)



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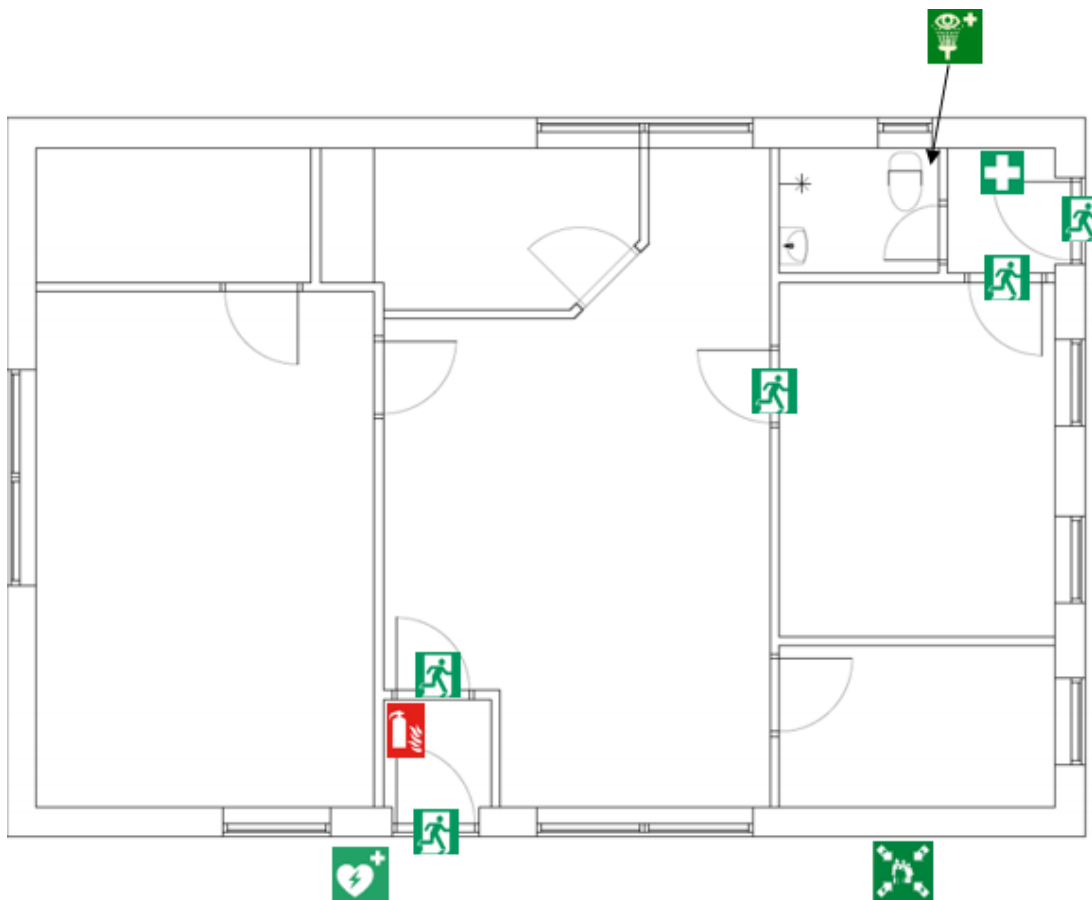
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5.2.7 EHS Office Layout



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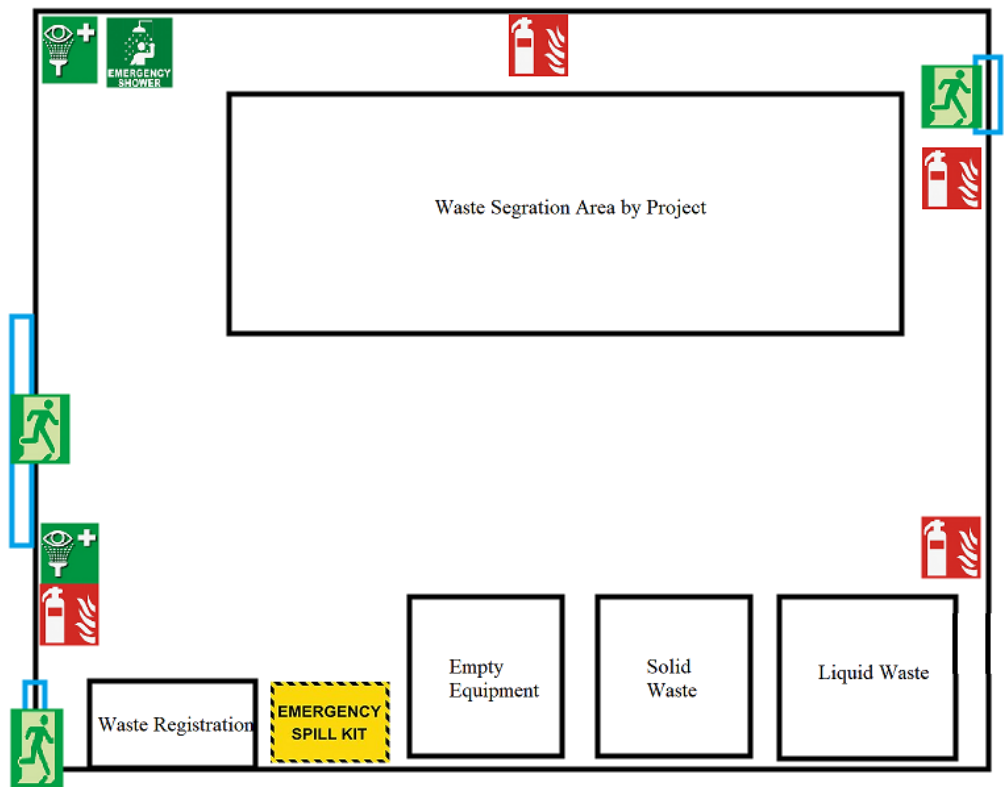
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5.2.8 Hazardous Warehouse Layout



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5.3 Appendix III “Symbol List”

Defibrillator		Fire extinguisher	
Medical Emergency Kit		Emergency Spill Kit	
Eye Wash Station		Muster (Assembly) Point	
Emergency Shower			
Emergency Exit	