



HEALTH, SAFETY & ENVIRONMENT REPORT 2009

Belvedere, UK

Belvedere is a world scale manufacturer of formulated salts and ester herbicides.

The plant

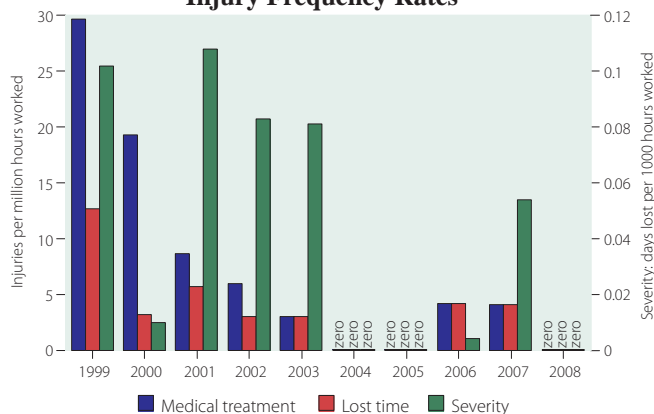
manufactures

- salts and esters of methyl phenoxy herbicides
- formulations of these herbicides

Health and safety performance

We are pleased that we did not record any serious injuries in 2008. As of 31/12/08 the site had worked 540 days without a LTI and 2,208 days (over 6 years) since a MTI.

Injury Frequency Rates



Note: All lost time injuries are also counted as medical treatment injuries

Improvements in most Key Performance Indicators have been noted.

Site personnel are encouraged to report UIRs, (near misses, damage to plant or property, observed risks, quality issues, as well as a number of other categories). We set a stringent target of 14.5 UIRs for every injury reported (our UIR/IR ratio) and it is pleasing to report that we exceeded this at 22.5, which far exceeded the previous year's figure of 11.1. It is also pleasing to note that the percentage of UIRs recorded in 'non-damage' categories increased. A safety initiative regarding the use of Fork Lift Trucks (FLT) has been initiated by one of our employees and is showing good results. All FLT drivers on site are being re-trained and tested. Completion is expected during 2009. After this refresher training, testing will take place every 4 years. Accidental damage to plant and equipment has decreased significantly as well as the potential for personnel injury as a result of this initiative.

	UIR/IR	Site Personnel	UIR/Person
2001	3.1	122	0.84
2002	4.5	131	1.11
2003	5.7	125	1.64
2004	6.2	110	1.61
2005	13.4	81	3.15
2006	14.4	83	3.65
2007	11.1	88	2.65
2008	21.4	89	3.12

In the ever more competitive environment that we all find ourselves working, it would be only too easy to allow safety to take a back seat. Whilst targets must be met to remain viable as a business, it is equally important that it is done safely. It is therefore worth noting, and celebrating, that Nufarm UK, Belvedere recently achieved a milestone in safety, attaining an average lost time accident rate of 0.18 per 100,000 hours worked for 2005 – 2007, against a target of 0.20/100,000 hours worked. This accomplishment has been marked by the UK Chemical Industry Association (CIA), with a Safety Award Certificate being issued to the Belvedere site in recognition. In 2006, for the first time in the site's history, Belvedere received the Safety Award Certificate. This is now the third successive year that Belvedere has received



Graham Harvey (R) presenting Alex Welsh with his Fork Lift Truck competency training certificate.

this award (with a fourth consecutive award due for the calendar years 2006 – 2008), and reflects the excellence and efforts of everybody on site. This award cannot be achieved by individuals or well presented documentation alone, it is a true testament to the hard work and vigilance of everyone at Belvedere and they should be congratulated.

Energy performance

A formal energy efficiency plan was introduced in 2008. Up until this point most of the improvements on site had been ad-hoc. Despite the ad-hoc arrangements, energy consumption per tonne of manufactured product continued to reduce; electricity down 8% and combined gas and diesel down 1%. The energy efficiency plan has assigned specific responsibilities to individuals on site, as well as introduced Key Performance Indicators (KPIs) for energy usage. A number of in-depth energy audits will be taking place during 2009 to focus on previous energy audit recommendations.

Voltage optimisation equipment was installed in 2008 and commissioned in early 2009. It is expected that further reductions in electricity consumption will result from this.

Energy Efficiency



Environment testing

The number of environmental tests carried out was approximately 20% fewer than last year but in line with 2005. Environmental compliance has continued to improve with 100% achieved for the third year running. Audits of our performance and our management systems were undertaken by the Environment Agency during the course of the year. These visit reports were encouraging and reflected the continual improvements taking place on site.

	Tests	% compliance
2000	6462	98.7
2001	7488	98.0
2002	5741	98.7
2003	2781	97.9
2004	2502	98.0
2005	1287	99.6
2006	1199	100
2007	1508	100
2008	1286	100

COMAH

The LFEPA (London Fire & Emergency Planning Authority) liaised with site to produce an off-site plan for COMAH (Control Of Major Accident Hazards Regulations) (Seveso II). The vast majority of the work has been completed with completion expected during 2009.

Wastes

A waste review program was undertaken in 2007 & 2008. This identified a number of improvements to the operations that are in the process of being undertaken. As a result of this, the total amount of waste sent for off-site disposal decreased significantly. Overall, waste generated per tonne of manufactured product reduced by 18%. Releases of active ingredients to sewer reduced by over 50%.

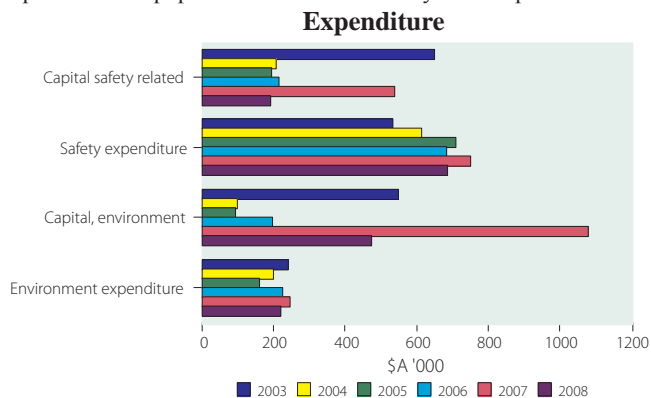
	tonne	2004	2005	2006	2007	2008
Org. liquids chlorinated		528	0.33	36.8	82.1	0.30
Org. liquid, other		0	4.25	0.014	0.013	0.018
Inorg. chemicals		411	0	0	0	0
Packaging contaminated		74	36	97.8	65.4	64.2
Solid waste, clean		135	397	276	342.8	347
Herbicides		14	4.7	2.9	4.4	14.7
Miscellaneous		75	189	0	0	0

Destination	2004	2005	2006	2007	2008
Incinerator	314	189	36.8	82	0
Sewage treatment	20	5.1	3	4.8	2.5
Recovery service	228	239	198	93	246.4
Landfill	123	127	122	85	119.7
Internal re-use	551	70	54	230	57.8
Total	1,237	631	414	495	428.4

Expenditure

Total health, safety and environmental expenditure decreased over last year mainly as a reflection of the current economic climate around the world. Despite this, significant projects were undertaken and included:

Refurbishment of storage tank banded areas, installation of an amine absorption vessel to reduce air emissions from the process and improve environmental performance and installation of voltage optimisation equipment to reduce electricity consumption.



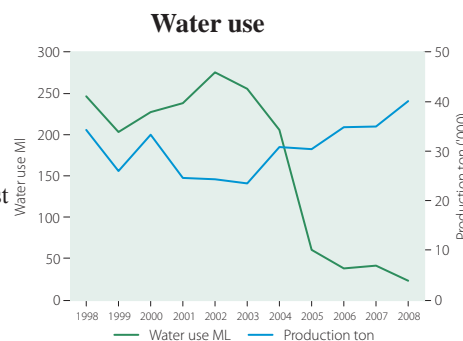
EPR

The Environmental Permitting Regulations (EPR) replaced IPPC (Integrated Pollution Prevention & Control Regulations) in April 2008. Further audits from the Environment Agency continued throughout the year. The auditors comments have been very good. The site continues to operate with 100% conformance to all our EPR discharge consent limits and has done since 2005.

Water use

A formal Water Use Review has been undertaken with targets to assess specific parts of the operation against best practice and reduce usage accordingly. An employee awareness program is ongoing to turn off / reduce usage.

This has resulted in good savings in water. One particular area of reduction has been in the Esters Environmental Water Scrubber. This unit previously operated at 1,600 litres per hour throughput of water and consumed a significant part of the site's total incoming water. This has been assessed and the throughput is now down to 400 litres per hour. In addition the unit is now turned off when the plant is not in operation. As a result of the water use review, water consumption on site has reduced by over 50%. There has been a corresponding decrease in effluent generated as a result of this.



Community activities

We take a lot of interest in our local community and in doing 'our bit' in industry and Government organisations. Just some of the initiatives we get involved in are:-

Our Operations Manager and *Responsible Care*® Manager are Governors of local schools. For the last six years Nufarm have been sponsoring Environmental projects at the local junior school and also assisted and supported this school during "Science week". Nufarm sponsors the Police in local schools in the "Child Safety Education Campaign". Gifts received during the Christmas period are raffled and proceeds are donated to charity. Spent printer cartridges, obsolete mobile phones, empty beverage containers and franked postage stamps are all sent to charities. Another pink charity day event was held on site where employees had to wear something pink for the day. Every department participated, the response and money raised was excellent and doubled our 2007 contribution. We like to support sporting activities at the junior level. Southmere JFC and Cricket Club (Dartford) are two teams sponsored by us, giving local youngsters healthy development. We sponsor a local Erith Football project run by



The filling plant dressed for Pink Day charity event

the local police and Bexley council as part of the "Bexley Anti-social Behaviour unit". We support learning initiatives such as through the local council environmental challenge cup and sponsorship at a local school for bio-diversity projects.

Our *Responsible Care*® Manager is a member of the Bexley Council Emergency Services Liaison Panel (BESLEP), Belvedere Community Forum and Riverside Community Forum (RCF)

Our Operations Manager & *Responsible Care*® Manager are members of the Belvedere Industrial Leaders Thameside (BILT).

The UK Operations Manager has been a council member (director) of the CIA for the last six years, working on strategy and issue groups for the CIA with the Competent authorities such as the HSE and EA.

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