

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Meeting of 17 February 2023  
**Date:** 16 February 2023 17:49:00

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Hello [REDACTED]

Some items for our meeting (sorry very short notice) – I don't expect you to have prepared, im just letting you know my thoughts.

1. The incident reported on the 19 December 2022 caused R22 and R125 to be released above permitted limits
2. R22 is an ozone depleting substance. The use of R22 should be closed loop. The Montreal Protocol allows exceptions, but the loss of R22 should be unavoidable and incidental.
3. The incident of the 23/12/2022 caused an exceedance of R22, by a small margin. However, the permit requires you to use BAT to reduce emissions. Notwithstanding the small exceedance, you released an ozone depleting substance and did not have sufficient measures in place to prevent this.
4. I am considering whether the cumulative events constitutes a serious breach of your permit.
5. I want you to describe how you account for climate change in your risk register – or what document
6. I am minded to carry out a climate change adaptation audit (but want to ensure that COMAH do not plan the same).

[REDACTED]

[REDACTED]

[REDACTED]