



Keuper Gas Storage Project

Preliminary Environmental
Information Report – EIA Methodology
and Consultation

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
EEA	European Economic Area
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction

Acronym	Description
ERM	Environmental Resources Management
ES	Environmental Statement
EU	European Union
HSE	Health and Safety Executive
IEMA	Institute of Environmental Management and Assessment
KGSL	Keuper Gas Storage Limited
KGSP	Keuper Gas Storage Project
MC	Material Change
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
oCEMP	Outline Construction Environmental Management Plan
PEIR	Preliminary Environmental Information Report
SoS	Secretary of State
SWMP	Site Waste Management Plan
ZoI	Zone of Influence

4. EIA METHODOLOGY AND CONSULTATION

4.1 INTRODUCTION

4.1.1.1 This chapter outlines the methodology adopted for the Environmental Impact Assessment (EIA) to support the presentation of the Preliminary Environmental Information Report (PEIR) chapters. It describes the approach used to identify and assess the environmental effects. It also outlines how the temporal, spatial and technical scopes of the EIA are developed.

4.1.1.2 In accordance with the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'), the EIA process for the Proposed Development includes the following:

- Establishing, through consultation, the scope of the EIA including obtaining a Scoping Opinion from the Secretary of State (SoS);
- Considering any potential technical and environmental alternatives;
- Establishing a comprehensive understanding of the existing baseline environmental and socioeconomic conditions for the land within the draft Order Limits and the relevant study areas for each topic;
- Identifying the potential environmental effects which may result from the Proposed Development;
- Determining how the potential environmental effects can be avoided, reduced or off-set through informed design and/or further mitigation and how its benefits may be enhanced;
- Identifying the likely residual effects which may result from the Proposed Development, taking account of the aforementioned mitigation measures; and
- Assessing the significance of the potential environmental effects in conjunction with other effects arising from the Proposed Development and those from other developments and/or sources (cumulative effects).

4.1.1.3 Further details for individual topic methodologies are provided in **Chapters 6 to 17**.

4.1.2 EIA PROCESS, REGULATION AND GUIDANCE

4.1.2.1 The EIA is a process required under the conditions of the European Union (EU) Directives 85/337/EEC and 97/11/EC ('the Directive') on the assessment of the effects of certain public and private projects on the environment. The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 provide for the continuation of the process of EIA consistent with the Directive following the UK's departure from the European Union.

- 4.1.2.2 The key objective of an EIA is outlined in Article 2 of the Directive which states that 'Member States' shall adopt all measures necessary to ensure that, before consent is given, projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects'.
- 4.1.2.3 Article 8 of the Directive specifies that 'the results of consultations and information gathered pursuant to (the EIA procedure) must be taken into consideration in the development consent procedure.'
- 4.1.2.4 The EIA Regulations transpose the requirements of the Directive into domestic law and apply to Nationally Significant Infrastructure Projects (NSIP) as defined in the Planning Act 2008.
- 4.1.2.5 Regulation 14 and Schedule 4 detail the required information to be included in an ES. The purpose of the Environmental Statement (ES) is to both inform the decision maker, and the PEIR and ES provide a source of information for stakeholders and the public regarding the likely significant environmental effects associated with a development allowing them to meaningfully participate in the process.
- 4.1.2.6 The EIA process is a systematic approach designed to identify, evaluate, and mitigate the likely significant environmental effects of a proposed development. The primary objective of EIA is to assess potential environmental impacts at an early stage of development, allowing for the identification of appropriate mitigation measures taken to avoid, reduce, or offset adverse effects. These mitigation measures are then integrated into the design of a development, or committed to through environmentally sensitive construction methods and practices.
- 4.1.2.7 In addition to the relevant directives and regulations, the EIA will be undertaken with reference to the following documents (plus topic-specific guidance), amongst others:
- The Overarching National Policy Statement (NPS) for Energy (EN-1¹) and NPS for Oil and Gas Supply and Storage (EN-4²) 2024;
 - Institute of Environmental Management and Assessment's (IEMA) Guidelines for Environmental Impact Assessment, Institute of Environmental Management and Assessment, 2004³;
 - The Planning Inspectorate's Advice on EIA Consultation and Notification, 2025 update⁴;

¹ DESNZ (2024). Overarching NPS for Energy (EN-1). Available at:

https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf.

² DESNZ (2024). NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4). Available at: https://assets.publishing.service.gov.uk/media/64252f7260a35e00120cb159/NPS_EN-4.pdf.

³ IEMA (2004). Guidelines for Environmental Impact Assessment.

⁴ The Planning Inspectorate (2025). Advice Note Three: EIA Notification and Consultation. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-eia-notification-and-consultation>

- The Planning Inspectorate's Advice on Cumulative Effects Assessment, 2025 update⁵;
- The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements Version 7, 2020⁶;
- The Planning Inspectorate's Advice Note Nine: Rochdale Envelope Version 3, 2018⁷;
- IEMA's Delivering Proportionate EIA, A Collaborative Strategy for Enhancing UK Environmental Impact Assessment Practice, 2017⁸; and
- IEMA's Guide to Shaping Quality Development, 2015⁹.

4.1.3 BASELINE FOR THE EIA

- 4.1.3.1 In undertaking an EIA for any project, it is essential to identify the environmental baseline for the potential receptors (both human and ecological) in the vicinity of the development location.
- 4.1.3.2 This allows the effects of the Proposed Development to be compared and / or combined with the existing quality of the environment, in order to deliver an informed assessment of the potential effects and to allow the identification of the most appropriate mitigation which could be employed to minimise any adverse impacts.
- 4.1.3.3 Schedule 4 of the EIA Regulations (paragraphs 3 and 4) requires the EIA baseline to provide the following:

'A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge';
and

'A description of the factors specified in regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example

⁵ The Planning Inspectorate (2025). Advice on Cumulative Effects Assessment. Available at: [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1000000/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment-2025-update.pdf)

⁶ The Planning Inspectorate (2020). Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements. Available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-and-environmental-statements/>

⁷ The Planning Inspectorate (2018). Advice Note Nine: Rochdale Envelope. Available at: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/>

⁸ IEMA (2017). Delivering Proportionate EIA: A Collaborative Strategy for Enhancing UK EIA Practice. Available at: <https://www.iema.net/resources/reading-room/2017/07/18/delivering-proportionate-eia>

⁹ IEMA (2015). EIA Guide to: Shaping Quality Development.

fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.'

- 4.1.3.4 **Chapters 6 to 17** describe the data sources to be used and the baseline studies that will be undertaken for the EIA. The baseline studies will focus on those aspects of the baseline environment that could be affected by one or more of the material changes to the Proposed Development. The studies will also consider any changes from the originally considered baseline that are material to the assessment of effects of the Proposed Development.
- 4.1.3.5 The future baseline conditions are also considered; these are the conditions anticipated to prevail at a certain point in the future, without the Proposed Development. The future baseline takes account of any planned or likely changes to the existing baseline that may occur prior to commencement of construction of the Proposed Development, such as the introduction of new potential receptors, changing conditions as a result of climate change, or the presence of committed developments expected to be fully constructed prior to the construction of the Proposed Development.
- 4.1.3.6 For some topics, the changes will be negligible and the future baseline conditions will not be materially different to the existing baseline conditions, for these topics, the future baseline is scoped out of the assessment.
- 4.1.3.7 **Chapters 6 to 17** describe the data sources used and the baseline studies undertaken to date for the EIA, together with those that are on-going and planned.

4.1.4 ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS AND MITIGATION

Assessment of Effects and Significance

- 4.1.4.2 'Impacts' are defined as the physical and chemical changes that are predicted to result from the Proposed Development and 'effects' are defined as the consequences of these impacts for ecological populations, ecosystems, and people (including the physical and cultural assets).
- 4.1.4.3 **Figure 4.1** presents an overview of the approach used to assess the likely significant effects that may occur from the Proposed Development.
- 4.1.4.4 Whilst **Figure 4.1** provides a general framework for identifying impacts and assessing the significance of their effects, in practice, the approaches and criteria applied across different environmental and

socio-economic topics vary. The topic-specific methodologies for establishing impact magnitude, receptor importance and sensitivity, and level of significance, are described in detail in **Chapters 6 to 17**.

- 4.1.4.5 To the extent necessary, all technical topics will address the material changes noted in **Chapter 2, Proposed Development Description**. Topics will only undertake assessments where a change to the already Consented Development may result in an impact that is materially different to that assessed in the Consented Development. Topics may also present updated assessments where there are significant changes in the baseline used to undertake the assessment presented in the Consented Development ES, or where there have been updates to the guidance and policy of topics, which therefore require additional assessment not considered in the Consented Development ES. Topics will address the material changes associated with the construction, operation (including maintenance) and decommissioning phases of the Proposed Development. However, as decommissioning will be more than 40 years in the future, it will not be addressed to the same level of detail as the other phases.
- 4.1.4.6 In accordance with Schedule 4 paragraph 5 of the 2017 EIA Regulations, *'the identification and assessment of effects for each topic will include an assessment of direct effects and any indirect, secondary, cumulative, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development, to the extent they are relevant'*.

Figure 4.1 EIA Methodology Overview

Identify Impact
The scoping process identified the potentially most important/significant impacts and effects (including secondary, indirect and cumulative) for the assessment to address. This was done through a combination of:

- looking at the nature of the Proposed Development activities and the impacts they will give rise to;
- looking at the Proposed Development's environmental and social setting and those aspects which are likely to be most sensitive/vulnerable to impacts from the Proposed Development;
- applying professional understanding gained from the evidence base; and
- incorporating inputs from stakeholders through the Scoping Opinion and public consultation.

Decisions were made on which impacts and effects to assess or to prioritise in the assessment (scoping in and scoping out) and how to assess them (proposed methodology, qualitative versus quantitative assessment).

Predict Magnitude
The Proposed Development's impacts have been quantified in terms of such matters as:

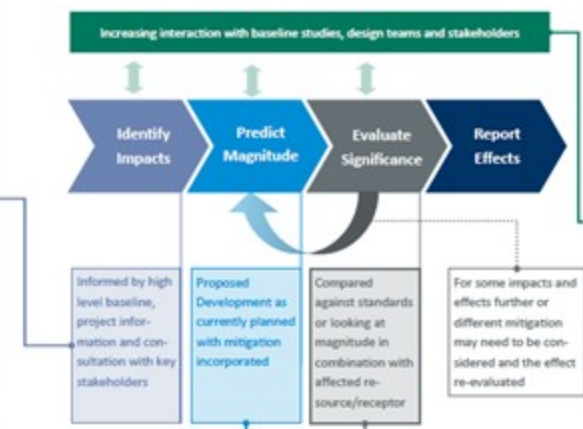
- area of habitat loss;
- proportion of an ecological population exposed to impact;
- change in noise levels or pollution at a receptor; and
- construction traffic pressures on the local highways.

In predicting magnitude, the effect of all the mitigation in place (i.e. adopted by the Proposed Development) has been taken into account.

For some impacts, especially noise, air and water pollution, significance has been assessed directly against numerical criteria and standards. For exceedances, further mitigation has been incorporated by the Proposed Development to reduce the magnitude of the impact (and the significance of its effect).

For other impacts nominal levels of magnitude (e.g. small, medium, large) have been adopted based on widely recognised factors such as: the nature of a change; its size, scale or intensity; its geographical extent and distribution; its duration, frequency, reversibility and, for unplanned events, its likelihood of occurrence.

Some activities will result in changes to the environment that may be immeasurable or undetectable or within the range of normal natural variation. Such changes have been assessed as having no impact or to be of negligible magnitude and will not lead to significant effects.



Evaluate Significance
In evaluating significance, the EIA process has sought to inform regulators and stakeholders about the effects of the Proposed Development in a way that helps them make decisions on whether to approve and allows them to develop suitable conditions to attach to an approval. The evaluation of significance ideally demonstrates legal compliance at least (e.g. compliance with quantified standards, avoidance of effects on legally protected resources).

In the absence of quantified standards, significance has been evaluated through considering the magnitude of an impact in combination with the importance/quality/value of the receptor or resource that is affected, also considering the response (or sensitivity) of a resource or a receptor to a particular impact. Effects of more than minor significance have been re-examined to see if an impact magnitude could be reduced further. Different mitigation options have been examined and the reasons for selecting one and rejecting others explained where appropriate. Some impacts/effects that cannot be adequately mitigated have been addressed through the consideration of offsets or compensation.

In some instances, the evaluation process has gone through one or more iterations of working with the Proposed Development design to develop suitable mitigation measures and re-evaluating impacts and effects. The PEIR reports the significance of the residual effects, with all the mitigation committed to by the Proposed Development fully taken into consideration.

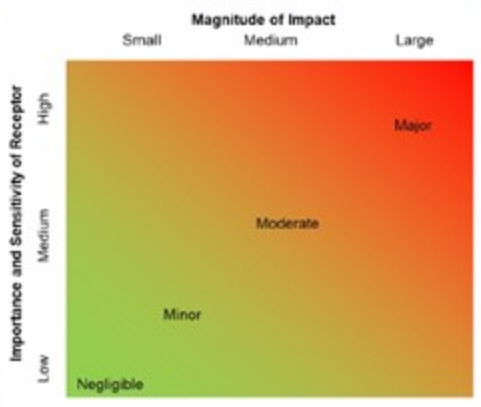
While the above provides a general framework for identifying impacts and assessing the significance of their effects, in practice the approaches and criteria applied across different environmental and socio-economic topics vary.

Describe Baseline
Baseline data have been collected to better understand the potentially most important impacts and effects identified in scoping. Baseline data quantify existing exposure levels (e.g. for noise, air and water pollution), identify vulnerable populations of animals or people's livelihoods, more clearly delineate valued cultural property and ecosystem services etc.

Where a baseline aspect cannot be quantified then nominal levels of importance, quality or value (low, medium, high) have been assigned based on widely accepted criteria in fields such as ecology, cultural heritage, landscape and socioeconomic assessment. Inter-relationships between elements of the baseline have been identified.

Interact with Design and Decision-making
The EIA process interacted with the Proposed Development design teams to develop a basis for the assessment (for example quantities of emissions, noise levels of equipment, sizes of structures). The EIA process also interacted with design to assess optimal mitigation measures, especially when after initial assessment some impacts needed to be further reduced.

Consult Stakeholders
Ongoing stakeholder consultation, is good practice in EIA and has been undertaken to: present preliminary findings to stakeholders to elicit early responses; refine the assessment; and help make the PEIR as fit for purpose as possible.



Mitigation

- 4.1.4.7 In assessing the significance of effects, consideration has been given to the measures that will be used to mitigate impacts and minimise any potential adverse effects of the Proposed Development on the environment.
- 4.1.4.8 Schedule 4 (paragraph 7) of the EIA Regulations requires that where significant effects are identified, '*A description of the measures envisaged to avoid, prevent, reduce, or if possible, offset any identified significant adverse effects on the environment*' should be included in the PEIR and ES.
- 4.1.4.9 One of the primary objectives of an EIA is to identify and define socially and environmentally acceptable, technically feasible, and cost-effective mitigation measures. Mitigation measures will be developed during the EIA processes to avoid, minimise, reduce, or remedy (e.g., reinstate or restore) any negative effects identified, and to create or enhance positive effects such as environmental and social benefits. Mitigation measures include design provisions and construction practices, as well as management actions.
- 4.1.4.10 In some instances, mitigation alone may not be sufficient to reduce an impact of effect to a level that is not significant, in which case other measures such as offsets (which can also deliver enhancement) are then considered. However, it is important to note the differentiation between the two and that enhancement is not mitigation, but rather a separate action that goes beyond impact reduction.
- 4.1.4.11 The mitigation measures developed during the EIA process, as well as standard industry practice measures, will be committed to by the Applicant as integral aspects of the Proposed Development.
- 4.1.4.12 Residual effects, once specific mitigation measures have been incorporated into the Proposed Development design (and into its construction and operational practices) will be classified as not significant or significant, as appropriate. Where effects are still significant, the mitigation options considered and the reasons for selecting particular measures will be reported in the ES.

Reporting Effects and their Significance in the PEIR

- 4.1.4.13 A key objective of the EIA process is to ensure that decisions on the Proposed Development are made in full knowledge of its likely effects on the environment and society.
- 4.1.4.14 The level of significance attributed to the reported effects is related to the weight that the EIA team considers can be given to them in making decisions on the Proposed Development, and where appropriate, the application of DCO requirements and other conditions.

- 4.1.4.15 Effects of Moderate significance or above are considered important to decision making, warranting careful attention to ensure that conditions regarding mitigation and monitoring employ the most appropriate technically feasible and cost-effective measures.
- 4.1.4.16 Effects of Minor significance or less are brought to the attention of decision makers, but will typically be considered as warranting little (if any) weight in the decision.

4.1.5 ENVIRONMENTAL MANAGEMENT

- 4.1.5.1 Whilst a Construction Environmental Management Plan (CEMP) was prepared for the Consented Development, some aspects will require an update for the Proposed Development to specifically cover the change from gas storage to hydrogen storage.
- 4.1.5.2 Therefore, an Updated Detailed CEMP will be prepared specifically for the Proposed Development, before construction commences in 2027. The future updated CEMP will conform to the mitigation measures identified for each of the environmental topics, any general environmental / construction management practices and health and safety considerations. The future updated CEMP will be further developed, monitored and maintained by the Applicant's Engineering, Procurement and Construction (EPC) contractor.
- 4.1.5.3 For the purposes of the MC application, as part of the ES, an updated outline CEMP (oCEMP) will also be submitted. The updated oCEMP will introduce documents and management plans that will be developed post-application. The updated oCEMP will act as a strategic level document that sets out the framework for effective management of safety, health, environmental and social impacts during the construction of the Proposed Development.
- 4.1.5.4 It is no longer a formal requirement for applicants to produce a Site Waste Management Plan (SWMP). However, it is acknowledged that the construction, operation, and demolition stages all have the potential to create waste. The Proposed Development will utilise good construction and management practices to ensure waste is minimised as far as possible and that the storage, transport and eventual disposal of waste have no significant environmental effects. Management and collection of waste streams will be carried out under the requirements of the UK waste regulatory regime. An Outline Waste Management Plan will be submitted as part of the ES and will also be covered in the updated oCEMP.

4.1.6 ENGAGEMENT AND CONSULTATION

- 4.1.6.1 This section gives a summary of the engagement / consultation activities which have been and will be undertaken by the Applicant to inform the EIA design. A detailed stakeholder mapping exercise was undertaken to identify key statutory and non-statutory stakeholders of the Proposed Development, in accordance with the Infrastructure

Planning (Applications: Prescribed Forms and Procedure) Regulations 2009).

- 4.1.6.2 A range of early engagement activities has been undertaken, with community members, local authorities, and other statutory stakeholders. A summary of engagement undertaken to date is provided in **Table 4.1**. Topic-specific consultation / engagement is detailed in **Chapters 6 to 17** where relevant.

Engagement Undertaken to Date

- 4.1.6.3 A summary of all consultation undertaken to date is provided below in **Table 4.1**:

TABLE 4.1 – CONSULTATION TO DATE

Consultation Date	Topic	Consultee	Comment (s) / Actions	Response
12 December 2024	Keuper Gas Storage (Hazardous Substances Consent)	HSE	Introduction of potential amendment of approved HSC for KGSP. Sought advice on assessment criteria.	HSC modelling work with hydrogen flowlines done. Referenced at meeting with CWAC on 20 February 2025.
17 December 2024	Cadent pipeline	Cadent	Introduction to KGSP team	Ongoing engagement.
25 January 2025	Material Change application	PINS	Introduction of Material Change and planning consent route.	Support for Material Change application.
10 February 2024	Site visit and introduction to KGSP	HSE and EA	Introduction of project, HSE resourcing, HSC, PCSR, Environmental Requirements	Ongoing engagement.
20 February 2025	Project update	Cheshire West and Chester Council (CWAC)	Introduction of Material Change Confirmed requirement to discharge 2017 DCO. Confirmed interest to amend 2017 DCO (reg 2, 20)	Planning Performance Agreement to be confirmed with CWAC.
26 February 2025	Cadent pipeline	Cadent	Alignment of design / site entrances.	Ongoing engagement.
4 March 2025	Cadent pipeline	Cadent	Discussion on strategy of alignment of KGSP project +	Ongoing engagement.

Consultation Date	Topic	Consultee	Comment (s) / Actions	Response
			Cadent Pipeline planning applications.	
6 March 2025	Project introduction and update	DESNZ	Project introduction and advice on planning consent route.	Ongoing engagement.
29 April 2025	Project introduction	Uniper	Introduction of MC for KGSP. Main discussion over interaction with Uniper assets.	Ongoing engagement when required.
19 May 2025	Project Introduction	EA	Introduction of MC for KGSP, programme, timelines, meeting schedules + cost recovery process.	Monthly meetings.
29 May 2025	Material Change project update	KGSP Steering Group	Meeting minutes shared with members and published on www.KGSP.co.uk Community benefit fund discussed.	Follow up meeting to be held in September prior to public consultation.

4.1.7 STATEMENT OF ENGAGEMENT

- 4.1.7.1 In devising the approach to preapplication public consultation on the Material Change application which involves one stage of formal pre-application consultation, regard has been had to The Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 and the Planning Act 2008: Guidance on Changes to Development Consent Orders (DCLG, 2015) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
- 4.1.7.2 The full approach to pre-application consultation for the Proposed Development is provided in the KGSP Statement of Engagement. This is available on the KGSP website at: www.kgsp.co.uk.
- 4.1.7.3 The following consultees have been engaged with in relation to the Proposed Development:
- Each person that was consulted about the application for the Consented Development (i.e. The Consented DCO and elements of the Non-Material Change);
 - All key statutory consultees who have provided comment on the Proposed Development;
 - Chester West and Chester Council Local Planning Authority (LPA);
 - Cheshire East and Halton Borough Council LPA;
 - Community stakeholders
 - Local residents living in proximity to the Proposed Development;
 - Local businesses in close proximity to the Proposed Development;
 - The general public
- 4.1.7.4 As mentioned in the Statement of Engagement, KGSL will carry out its consultation period for no less than 30 days. This will commence on the 2nd October 2025, post the submission of this PEIR.

Consultation Methods

- 4.1.7.5 The following consultation methods will be used to ensure that the local community and stakeholders have an opportunity to find out more and comment on the proposed MC application.
- Newsletter
 - Information event
 - Online Q&A
 - Media and advertising - Notices in Northwich, Middlewich and Winsford Guardian and Notices placed at site (USB sticks for distribution). Notices to also be placed in the London Gazette for two weeks.
 - Project website
 - Local liaison group

- Meetings and briefings – to relevant local councillors, stakeholders and landowners
- Direct communication.

- 4.1.7.6 The feedback mechanisms for consultees to provide comments include questionnaires, freepost, email and the KGSP website. Further information on each of these is given in the Statement of Engagement.
- 4.1.7.7 Post the consultation period in Autumn 2025, a Consultation Report will be submitted as part of the MC application and included on the PINS and KGSP website. This will include a description of the Proposed Development, the approach to consultation, capture how consultation responses have been addressed and summarise all responses. The MC application will be publicised in accordance with Regulation 14, 17, 19 and 20 of the 2017 EIA Regulations.

Consideration of Non-Material Change Comments and Project Leakage

Overview

- 4.1.7.8 As noted in **Chapter 1, Introduction**, a Non-Material Change to the Consented Development was rejected by the Secretary of State in 2022. As part of the Secretary of State's decision, they highlighted a series of matters which would need to be addressed in any future MC or DCO for hydrogen storage. Therefore, in support of this MC, these matters are listed in **Annex A, Consideration of Non-Material Change Comments** which also signposts where they have been captured in the PEIR.

4.1.8 SCOPE OF THE ASSESSMENT

General Considerations

- 4.1.8.2 The scope of the assessment is categorised into the following:
- Technical scope;
 - Spatial scope; and
 - Temporal scope.

The Technical Scope

- 4.1.8.3 **Chapters 6 to 17** specify the approach to be implemented for each technical topic (the 'technical scope') that comprise the EIA. In some cases, reference is made at the topic level to the spatial and temporal scopes, and these will be refined further as the EIA develops and will be described in the ES.
- 4.1.8.4 Each technical topic chapter also provides a 'basis of assessment', which sets out the design and construction parameters (including

where necessary, the Rochdale envelope) that have advised the respective assessment, quantifying these where possible.

- 4.1.8.5 The technical scope also identifies the approach to baseline data collection and criteria for assessing significance.

The Spatial Scope

- 4.1.8.6 The spatial (or geographical) scope considers the following factors:
- The physical extent of the Proposed Development design;
 - The nature of the baseline environment and the manner in which specific impacts are expected to be generated from their source; and
 - The pattern of governmental administrative boundaries, which provide the planning and policy context for the Proposed Development.
- 4.1.8.7 For example, any potential effects on buried archaeology are likely to be confined to those areas physically disturbed by the works, whilst the effects of noise or visual intrusion could potentially be experienced at some distance from the works.
- 4.1.8.8 Applicable study areas will be proposed for each environmental topic by the experts undertaking that assessment, and in agreement with the relevant consultees.

The Temporal Scope

Overview

- 4.1.8.9 The temporal scope of the assessment typically refers to the time periods over which impacts may be encountered. This will be detailed for each topic, where necessary through discussion with the key statutory consultees.
- 4.1.8.10 Terms used to qualify the duration of an impact of effects will tend to be specific to the topic being considered.

Construction

- 4.1.8.11 Construction phase impacts could possibly occur during the whole of the construction works, which are detailed further in **Section 2.3 of Chapter 2, Proposed Development Description**.
- 4.1.8.12 Whilst the construction phase will not be continuous for 24 hours each day, there will be periods when noise generating activities take place on site and periods where there will be more intensive traffic movements.
- 4.1.8.13 The assessment for construction will also consider the time of day during which works are likely to be undertaken, notably whether they will be undertaken during daytime or night-time periods.

Operation and Maintenance

- 4.1.8.14 For the operational phase of the Proposed Development, the temporal scope will be determined by the predicted date of the commencement of hydrogen storage, and therefore, the anticipated operating lifetime of the Proposed Development Description.

Decommissioning

- 4.1.8.15 Decommissioning activities are likely to commence soon after operations cease and are unlikely to take longer to complete than the construction phase.
- 4.1.8.16 As decommissioning is expected to occur more than 50 years in the future, limited information regarding its extent, the process involved, and their respective durations is available at this stage.
- 4.1.8.17 As a reasonable worst case, the decommissioning activities are expected to be very similar to those proposed during the construction phase of the Proposed Development, and will be carried out in accordance with management and mitigation measures outlined in a Decommissioning Plan (including a Decommissioning Environmental Management Plan (DEMP)). It is generally assumed that the environmental effects associated with decommissioning will be of equal (or lesser) significance than those expected to occur during construction, unless otherwise stated. This assumption will be revisited in the ES.

Applying the 'Rochdale Envelope' Approach

- 4.1.8.18 The EIA will take account of all the reasonable variations in the form of the Proposed Development that should be permissible under the parameters and describe and assess the likely significant effects on the environment under a reasonable worst-case scenario. Such an approach is good practice, as reflected in case law on the 'Rochdale Envelope' principle (the Planning Inspectorate Advice Note Nine (July 2018; version 3)).
- 4.1.8.19 A balance has to be sought between defining the Proposed Development in enough detail to predict its impacts, whilst leaving sufficient flexibility to allow the Proposed Development to be successfully delivered.
- 4.1.8.20 The Proposed Development design (or elements thereof) will be expressed as an 'envelope' for the purpose of assessing its impacts or possible range of impacts, including reasonable 'worst-case' impacts. To ensure that likely significant effects of the Proposed Development on the environment are appropriately described and assessed, parameters will be set which:
- Are broad enough to encompass the potential variations in design and other aspects of the Proposed Development as it moves

forward through alter stages of design, after a material change to the DCO may have been granted; but

- Provide sufficient detail to make an assessment of the effects and allow informed decisions on the application.

Consideration of the Main Alternatives

- 4.1.8.21 Schedule 4 (paragraph 2) of the 2017 EIA Regulations requires developers to outline the main alternatives they have studied and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The EIA will therefore discuss the main alternatives considered and set out the reasoning for the Applicant's choice, considering the environmental effects and the Applicant's overall objectives for the Proposed Development. The EIA addressed alternatives in **Chapter 3, Alternatives**.

4.1.9 INDIRECT, SECONDARY, CUMULATIVE, AND INTRA-PROJECT EFFECTS

Indirect Effects

- 4.1.9.2 There is no widely accepted definition of 'indirect' effects. Indirect effects are taken to be effects that arise from the impact of activities not explicitly forming part of the Proposed Development, and therefore, not under the control of the Applicant.
- 4.1.9.3 Indirect effects may be the consequence of an action of the Proposed Development and occur much later in time or are much farther removed in distance, albeit still reasonably foreseeable. Indirect effects may also include (for example) the consequences of economic, or population growth induced by a project, and other effects related to induced changes in the pattern of land use, population growth rate and related effects on air, water and soil, and ecosystems in general.
- 4.1.9.4 For the purposes of this EIA, 'indirect effects' are taken as being the consequences of other developments relied on by the Proposed Development, but not part of the Proposed Development (and therefore the Application).
- 4.1.9.5 It is not anticipated there will be any indirect effects associated with the Proposed Development, although, this will be confirmed in the ES which will include a standalone section in **Chapters 6-17** to assess the significance of any indirect effects for each of the environmental topics.

Secondary Impacts and Effects

- 4.1.9.6 'Indirect' and 'secondary' effects are often used interchangeably. However, the EIA Regulations do distinguish between the two terms. For the purposes of the EIA, 'secondary' (and higher order) effects

are taken to be part of a chain of impacts or effects that can be directly traced back to an action of the Proposed Development, mitigated by it.

- 4.1.9.7 Secondary impacts and effects are assessed integrally within and between the topic assessments. For example, emissions to air will have an impact on air quality with potential effects on people and ecological populations that are directly exposed. Similar to the indirect effects mentioned above, it is not anticipated that there will be any secondary effects associated with the Proposed Development. This will be confirmed in Chapters 6-17 of the ES.

Cumulative Effects

- 4.1.9.8 Cumulative effects may occur when the impacts associated with the Proposed Development are additive with those associated with other developments in the vicinity, potentially resulting in an effect of greater significance upon a common receptor.
- 4.1.9.9 Cumulative effects will be considered in **Chapter 18, Cumulative Effects Assessment** which will also include a short and long list of any new cumulative developments to be assessed for the ES.
- 4.1.9.10 Both the EIA Directive and the 2017 EIA Regulations require an EIA to consider the potential for the Proposed Development to have cumulative effects on receptors. NPS EN-1 also refers to the consideration of cumulative effects in paragraph 4.2.5, stating that 'The ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other developments (including projects for which consent has been sought or granted, as well as those already in existence).
- 4.1.9.11 Projects, plans, and proposals with which the Proposed Development may have cumulative effects will be identified in consultation with the local planning authority and assessed accordingly.
- 4.1.9.12 Planning Inspectorate advice on Cumulative Effects Assessment (CEA) relevant to NSIPs goes on to emphasise the importance of considering cumulative effects in the context of the EIA Directive, the EIA Regulations and the Overarching Energy NPS EN-1.
- 4.1.9.13 The CEA proposed for the Proposed Development will adopt the four-stage approach set out in Advice Note 17 as follows:
- Stage 1: Establish the Proposed Development's Zone of Influence (ZoI) and identify a list of other developments within it;
 - Stage 2: Identify a shortlist of other developments for CEA based on their potential to have similar effects to those of the Proposed Development on the same receptors;
 - Stage 3: Information gathering; and
 - Stage 4: CEA.

4.1.9.14 The CEA process is detailed in full in **Chapter 18, Cumulative Effects Assessment**.

Interactions Between Environmental Factors

- 4.1.9.15 Aspects of the environment are interlinked to varying degrees such that interrelationships exist on different levels. Interactions between factors of the environment can be one way, two-way or more complex. This is acknowledged by the requirements set out in Regulation 5 part (2) of the EIA Regulations, which states the following (emphasis added).
- 4.1.9.16 'The EIA must identify, describe and assess in appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors:
- Population and human health;
 - Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(14) and Directive 2009/147/EC(15);
 - Land, soil, water, air and climate;
 - Material assets, cultural heritage, and the landscape; and
 - The interaction between the factors referred to in sub-paragraphs (a) to (d).
- 4.1.9.17 As the EIA has been undertaken by a team of specialist consultants, an important aspect of the EIA process has been to ensure that suitable communication and collaboration between the individual disciplines has occurred around important areas of interaction between the environmental factors described in the EIA Regulations.
- 4.1.9.18 Topic specialists have therefore liaised with each other in addressing the likely interactions between environmental (and socioeconomic) factors and the effects on them predicted as a result of the Proposed Development. Where key inter-relationships exist between different factors, an impact or effect on one factor is identified and the assessment has then aimed to address the effect (or effects) this may have on the related factor (or factors). This approach has covered all phases of the Proposed Development and also applied to developing appropriate mitigation measures for incorporation into design and working practices. Where such interactions are particularly relevant this is highlighted in the topic chapters of this PEIR, for example, noting where one topic is reliant on another topic for parts of its basis of assessment, or where mitigating an impact under one topic has benefits in avoiding or reducing likely significant effects under another topic.

Transboundary Effects

- 4.1.9.19 Regulation 32 of the EIA Regulations (Developments with significant transboundary effects) applies where an ES is to be provided that, in

the opinion of the SoS, shows the development is likely to have significant effects on the environment in another European Economic Area (EEA) State.

- 4.1.9.20 The SoS undertook an initial transboundary screening for the Proposed Development, which concluded that based on the available information (i.e., the Scoping Report), the Proposed Development is not likely to have a significant effect on the environment in an EEA State. As such, transboundary effects are not considered further within this PEIR.

Addressing Uncertainty

- 4.1.9.21 Even with a final Proposed Development description and an unchanging environment, predictions of impacts and their effects on resources and receptors can by definition be uncertain. Predictions can be made using varying means ranging from qualitative assessment and expert judgement (including reference to the evidence base) through to quantitative techniques (e.g., modelling). The accuracy of predictions depends on the methods used and the quality of the input data for the Proposed Development and the environment. Where an assumption has been made, the nature of any uncertainty is presented.
- 4.1.9.22 Where uncertainty affects the assessment of effects, a conservative (i.e. reasonable worst-case) approach to assessing the likely residual effects is adopted, with mitigation measures developed accordingly.
- 4.1.9.23 To verify predictions and to address areas of uncertainty, monitoring will be proposed as a key aspect of environmental management for the construction and operation of the Proposed Development.

REFERENCES

DESNZ (2024). Overarching NPS for Energy (EN-1). Available at:
https://assets.publishing.service.gov.uk/media/64252f3b60a35e00120cb158/NPS_EN-1.pdf.

DESNZ (2024). NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4). Available at:
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APPENDIX A CONSIDERATION OF NON-MATERIAL CHANGE COMMENTS

TABLE 4.2 – RESPONSES AND ACTIONS TO ADDRESS THE COMMENTS RAISED IN THE NON-MATERIAL CHANGE BY THE SECRETARY OF STATE

Topic	Comment	Action and PEIR Reference
Insufficient information on hydrogen storage and leakage	<i>"The Secretary of State has fully considered the Environmental Report and the supporting documents. She considers that the Geostock Safety Report is of particular relevance to her consideration of the Application. The Geostock Safety Report briefly evaluates impermeability based on existing cavern operations elsewhere in the UK such as Teesside [Geostock Safety Report 3.1]. However, the Secretary of State notes that Teesside is operated as a slow cycling cavern used to supply industrial processes, with smaller changes in pressure and temperature than are proposed here. As such, the Secretary of State does not consider Teesside an appropriate comparison in this case. The Secretary of State considers that the potential consequences of leakage have not been sufficiently discussed in the Environmental Report: there is some</i>	The Applicant notes the SoS response, and intends to submit a Material Change application to the Consented Development. Rationale as to why a Material Change is being proposed is outlined in Chapter 1, Introduction and Chapter 2, Proposed Development Description of the ES. Further information on hydrogen storage and leakage is available for consultation and will be provided as part of the MC application submission, via a stand-alone report (Salt Cavern Storage Hydrogen Integrity Report, HyKeuper Material Change to Hydrogen Application, Storengy, 16 th September 2025). Further assessment on hydrogen storage and leakage effects on the



Topic	Comment	Action and PEIR Reference
	<i>discussion of risks to ecology and impacts on greenhouse gas emissions, but possible impacts of increased diffusivity, potential leakage and emissions are not considered in the context of these areas of concern [Environmental Report 4; 6; 9]. The Secretary of State considers that these are key issues which needed to be addressed in order for the Secretary of State to have been satisfied that the proposed change could be made as a non-material change. She concludes that the Environmental Report does not address these issues in sufficient detail to enable the conclusion that changes relating to hydrogen are non-material”.</i>	environment will be included within the Final ES.
Wording of Development Consent Order – Natural Gas and Hydrogen	<i>The Secretary of State notes that the proposed change to the wording of the Order to amend the definition of ‘gas’ within Part 1, Article 2 of the Order to include ‘hydrogen’ gas in addition to ‘natural’ gas would give the Applicant the option to store only hydrogen gas, both hydrogen gas and natural gas or only natural gas. The Secretary of State has assessed the Application on the basis that any of these outcomes is possible, but notes that the</i>	<p>The Applicant notes the SoS response and intends to submit a Material Change application for the storage of hydrogen only.</p> <p>This PEIR has made it clear that that project is only seeking to store Hydrogen and that this is the main reason for the material change application. Wording will also be</p>



Topic	Comment	Action and PEIR Reference
	<i>supporting documents suggest that only hydrogen would in fact be stored, for example, "the proposed amendment is for the storage of hydrogen gas rather than natural gas" [Environmental Report 1] and "operating the site as a hydrogen storage facility instead of a natural gas storage facility" [Environmental Report 4.5]. The Secretary of State considers that if the Applicant's intention is to store only hydrogen gas, as indicated by the supporting documents, it would be preferable if this was reflected in the amendments to the Order.</i>	updated in all ES chapters and other supporting documentation before submission.
Leakage of Hydrogen	<i>"The Secretary of State has not been provided with information by the Applicant on whether there are different chemical and physical properties between natural gas and hydrogen gas, whether such differences may give rise to an increased risk of gas leakage, or any modelling of the proposed method of storing and emptying gas caverns using hydrogen gas. The Secretary of State concludes that consideration of leakage and permeability is lacking in the Application documents, that the risk of hydrogen leakage cannot be discounted and that this risk, and associated</i>	The Applicant accepts the SoS response. Effects of leakage will be assessed in the ES and further safety mitigation will be provided in Chapter 15, Major Accidents and Disasters of the ES. Further information on chemical and physical properties between natural gas and hydrogen storage has been provided within Section 5.0 via a stand-alone report (Salt Cavern Storage Hydrogen Integrity Report, HyKeuper Material Change to



Topic	Comment	Action and PEIR Reference
	<i>environmental impacts, needs to be taken into account within the Environmental Report. She considers that this information is essential in order for the safety implications of the proposed changes to be fully understood. Due to the novel nature of the proposed changes relating to hydrogen she does not consider that it would be appropriate to defer safety matters to subsequent control regimes (e.g. COMAH)".</i>	Hydrogen Application, Storengy, 16th September 2025).
Safety Information	<i>"The Geostock Safety Report outlines safety measures which will be included in future written documents [Geostock Safety Report 6; 7]. The Secretary of State further notes the Applicant's response to Mr Jones during the consultation on the Application where the Applicant briefly listed measures it intends to put in place to minimise the risk of accidents or loss of containment. Given the extent of the uncertainties and complexities associated with the proposed changes relating to hydrogen, the Secretary of State considers that these matters should have been addressed in the documentation submitted to her with this Application in order to fully inform consultees and to inform the Secretary of State's</i>	<p>The Applicant notes the SoS response, and intends to submit a Material Change application to the Consented Development to address this point.</p> <p>Further information on Process Safety is included within Section 7.0 via a stand-alone report (Salt Cavern Storage Hydrogen Integrity Report, HyKeuper Material Change to Hydrogen Application, Storengy, 16th September 2025) and provided in Chapter 15, Major Accidents and Disasters.</p>



Topic	Comment	Action and PEIR Reference
	<i>consideration of the materiality of the proposed changes relating to hydrogen. In addition, the additional information provided in response to Mr Jones is not of itself sufficient to persuade the Secretary of State that the proposed change is non-material”.</i>	
Leakage of hydrogen insufficiently assessed - specifically biogeochemical and microbial reactions; monitoring including groundwater; induced seismicity; material degradation.	<i>“In addition to considering the information provided by the Applicant, the Secretary of State has noted recent research by the International Energy Agency’s Hydrogen Technology Collaboration Programme-Task 42 (2023), “Underground Hydrogen Storage: Technology Monitor Report”⁴ (“IEA Report”). The IEA Report indicates that hydrogen has different reaction pathways to natural gas and is more likely to undergo different biogeochemical and microbial reactions, particularly in a fast-cycling cavern where changes in pressure and temperature during injection can induce these reactions [IEA Report 1.2.2; 2.2.1]. The IEA Report indicates that permeability and leakage should be considered with regard to storage conditions, geological properties and operational design of a specific site [IEA Report 2.2.2] and suggests</i>	<p>The Applicant notes the SoS response.</p> <p>Preliminary Effects on groundwater and geology have been assessed in Chapter 6, Geology and Ground Conditions. Further assessment of the potential effects of hydrogen leakage on groundwater will be considered in the ES.</p> <p>Further information on biochemical, microbial reactions; thermodynamic comparison between hydrogen and natural gas; leakage monitoring, including the assessment of ground water interaction; induced seismicity and material degradation will be provided as part of the MC application submission, within</p>



Topic	Comment	Action and PEIR Reference
	<i>ways to monitor risk such as monitoring hydrogen purity as an indicator of biogeochemical reactions, monitoring leakage above and below ground, monitoring groundwater, induced seismicity and material degradation [IEA Report 2.5]. The Secretary of State notes the differences between natural gas and hydrogen and considers that these issues have not been sufficiently addressed in the Application documents provided so as to assure her that the change proposed in the Application would not be material”.</i>	Section 5.0 and 6.0 of the stand-alone report (Salt Cavern Storage Hydrogen Integrity Report, HyKeuper Material Change to Hydrogen Application, Storengy, 16th September 2025).
Change from Natural Gas to Hydrogen	<i>”To conclude, it is not possible to be satisfied that the changes relating to hydrogen would not result in new, or materially different, likely significant effects on the environment. Given the absence of this information, and other considerations as outlined above, the Secretary of State concludes that the Environmental Report is insufficient to support a conclusion that the amendment of the definition of ‘gas’ to include ‘hydrogen’ is non-material. The Secretary of State concludes that an updated ES (from that at the time the original Order was made) would be required to take account</i>	The Applicant accepts the SoS response regarding the materiality of the change. The Applicant intends to submit a Material Change to the Consented Development, which will include an ES inline with EIA regulations. Changes to hydrogen storage are discussed in Chapter 2, Proposed Development Description and the likely significant effects are discussed in Chapters 6-17 .



Topic	Comment	Action and PEIR Reference
	<i>of potential new, or materially different, likely significant effects on the environment”.</i>	
Habitat Regulations Assessment	<i>The Secretary of State notes that the HRA for the original Order concluded that there were no likely significant effects on any Special Area of Conservation (“SAC”) or Special Protection Area (“SPA”) or Ramsar site. In deciding whether the change to amend the definition of ‘gas’ to include ‘hydrogen’, and changes contingent on this, is non-material, the Secretary of State must consider the nature and impact of the changes proposed and be satisfied that there is no change to the conclusions of the HRA as a result of the proposed changes relating to hydrogen and therefore that a new HRA is not required. The Secretary of State notes that the Environmental Report does not explicitly reassess the potential for different impacts on protected sites which may result from changes relating to hydrogen. Consequently, the Secretary of State cannot say with certainty that the conclusions of the original HRA still apply and that any impacts of the proposed</i>	The applicant notes the response from SoS and can confirm the following a review that there are no new European sites to consider beyond those that were assessed for impacts in the original ES, and the only concern raised was regarding potential changes in emissions and effects on air quality. This has been scoped out following air quality modelling and will not trigger the requirement for a HRA. The likely significant effects on habitats due to the changes to hydrogen storage are outlined in Chapter 10, Ecology and Nature Conservation .



Topic	Comment	Action and PEIR Reference
	<i>changes relating to hydrogen would not be material.</i>	
Great Crested Newt Licensing	<i>The Secretary of State notes the conclusion on EPS in the Environmental Report. The Applicant acknowledges that the Biodiversity Mitigation Plan ("BMP") and the licensing situation with regard to great crested newts needs to be reviewed given that the BMP refers only to Phase 1 of the project, and acknowledges NE must be satisfied with the licencing and mitigation proposed for the new scheme. The Secretary of State notes NE's consultation response which states that they do not foresee any new ecology impacts and that their previous advice can still apply to the project, if amended as proposed by the Applicant. The Secretary of State notes that the Environmental Report does not explicitly reassess the potential for different impacts on EPS which may result from changes relating to hydrogen. Consequently, the Secretary of State cannot say with certainty that the proposed changes relating to hydrogen do not</i>	The applicant notes the SoS response, further survey results on Great Crested Newts (GCN) are presented in Appendix 10B of the PEIR and discussed in Chapter 10, Ecology and Nature Conservation . Further consultation with NE is ongoing to ensure the appropriate licensing route and biodiversity mitigation measures are achieved.



Topic	Comment	Action and PEIR Reference
	<i>bring about the need for a new or additional licence in respect of EPS.</i>	
Updated Environmental Statement and Additional Information	<i>"While the Applicant has submitted updated environmental information within the Environmental Report and accompanying supporting documents, the Secretary of State considers this information to be insufficient for the reasons outlined in this list. Further, the Secretary of State considers that the additional information required is of such a nature and extent that it would represent a significant change to the original ES, and consequently this strongly indicates that the amendment applied for is not a non-material change. The Secretary of State concludes that an updated ES (from that at the time the original Order was made) would be required to take account of potential new, or materially different, likely significant effects on the environment".</i>	The applicant accepts SoS position on the need for an updated ES. The applicant intends to submit a Material Change to the Consented Development which will include an updated ES inline with EIA regulations.



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