PRIMARK®

EnMS ISO 50001:2018

EnMS Article: A.4.4.1.D EnMS Manual

Energy Management System (EnMS) Manual

Primark Stores Ltd

DRAFT Version D3 – 20/04/2021

Section En-M-1 Contents Page

Section En-M-2 Distribution List

Group Sales and Operations Director
Brand and Store Development Director
Director of Construction
Head of FM
Deputy Head of FM
Energy Manager
Group Environmental and Sustainability Manager
Senior FM Manager
Head of Transport, Supply Chain
FM Regional Manager, UK-SW
FM Regional Manager, UK-N
FM Regional Manager, ROI&NI
FM Regional Manager, Northern Europe
FM Regional Manager, Southern Europe
FM Regional Manager, USA
Construction Manager UK & N Europe
Construction Manager Ireland & S Europe
Internal Auditor
Technical Bureau Manager

Section En-M-3 Introduction

For the purpose of clarity and to avoid confusion between the general term 'document' and the class-type 'Document', elements of the EnMS will be referred to as articles.

Within this article, where reference is made to 'Clause #.#' this is a reference to the respective clause of ISO50001:2018.

This EnMS Manual describes Primark's Energy Management System (EnMS) and refers to the electronic EnMS file which contains all the relevant EnMS documentation including documents, procedures, methodologies and records. The EnMS has been designed to comply with ISO 50001:2018. The EnMS Manual is to help signpost the key elements of the EnMS and describe how it meets the requirements of ISO 50001:2018. The Manual will help those involved in the running of the EnMS and provide guidance to internal and external auditors.

The main section of this EnMS Manual mirror the main clauses of ISO 50001:2018 to make it clear how the EnMS meets the requirements.

The key clauses of the EnMS are shown in Figure 1 which shows the Plan, Do, Check, Act cycle of all management systems.

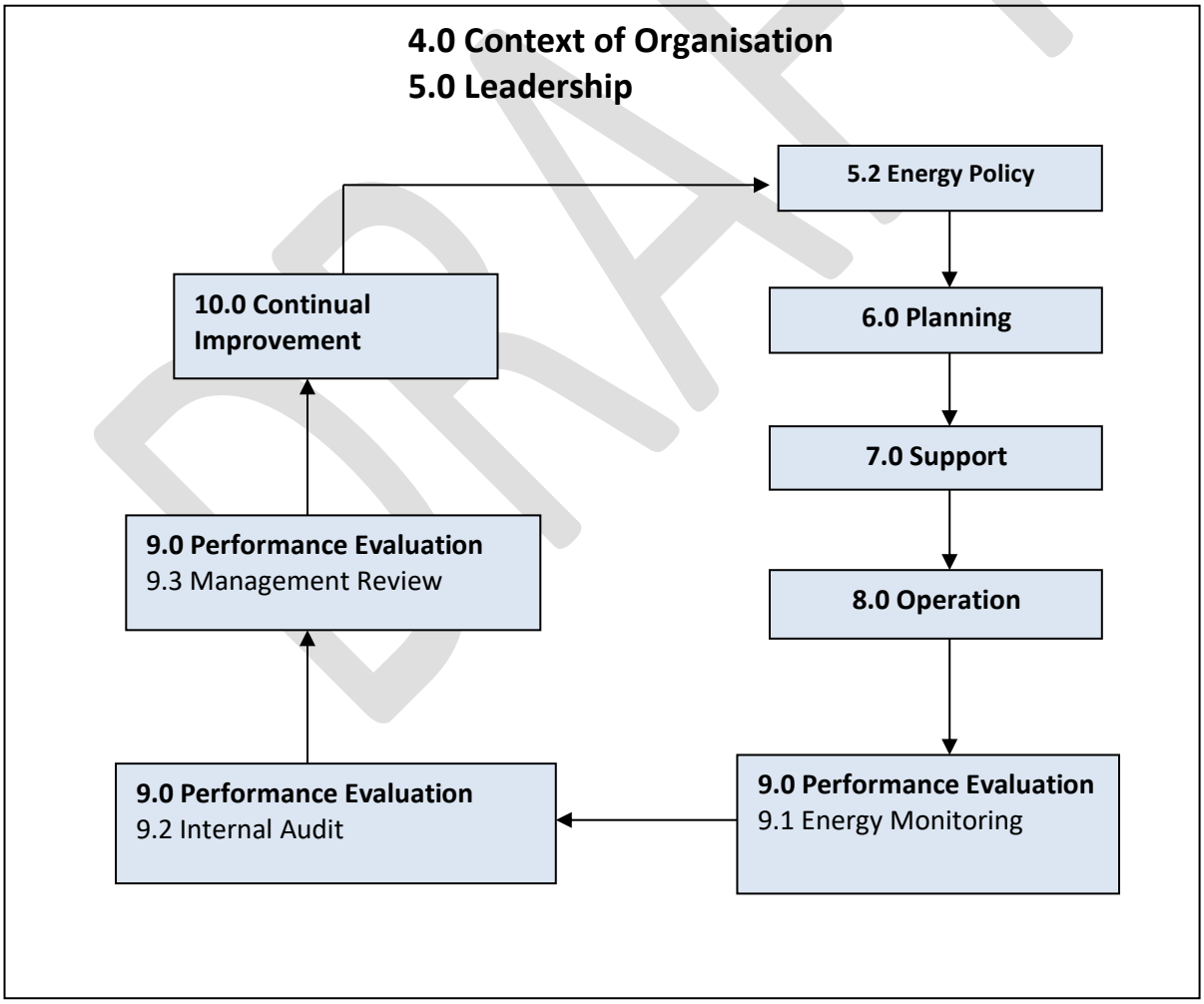


Figure 1 Key elements of clauses of ISO 50001:2018

Section En-M-4 Context of Organisation

4.1 Understanding the organisation and context

This is a new requirement under ISO 50001:2018. It is met by EnMS article *A.4.1.1.D Organisation and Context* which meets the requirement as it:

- states the purpose of Primark as an organisation
- identifies external and internal issues which are relevant to its purpose and affects the ability to achieve the intended outcomes of the EnMS and improve energy performance

4.2 Understanding the needs and expectations of interested parties

4.2.1 Interested Parties

This is a new requirement under ISO 50001:2018 for the interested parties element and is met by EnMS article*: A.4.2.1.D Interested Parties* which meets the requirement by:

- Listing interested external parties (persons or organisations) what are identified to be relevant to energy performance and the EnMS
- How relevant requirements/needs/expectations are addressed by the EnMS

4.2.2 Legal Requirements

A list of legal requirements relating to energy use and consumption in all regions (within scope) can be found in EnMS article *A.4.2.2.D Legal Requirements*.

This article describes which legal requirements are directly applicable to Primark and requires response and action. It also lists how compliance is met for the applicable legal requirements identified.

Legal updates are notified through the Pegasus system to which Primark subscribes. At appropriate intervals the legal register will be updated to reflect changes in the relevant legislation.

4.2.3 Legal Review

In accordance with the sub-clause 9.1.2 'Legal Review', legal requirements will be reviewed. This will occur at least once per year as part of an input to the Management Review. The results of this review will be recorded in the EnMS article *A.9.1.2.R Legal Review*.

4.3 Determining Scope of the EnMS

Scope and Boundaries

Included in the EnMS **scope** are all energy sources in Primark stores, offices and distribution centres throughout Europe and the USA. Transport for freight/goods is excluded, but transport for Primark employees business journeys is included.

With the exception of the DC at Islip (UK), all other DCs are operated by either DHL or DSV on Primark's behalf.

There are two main office buildings:

- Arthur Ryan House, Dublin (RoI)
- Primark House, Reading (UK)

The **boundaries** are the physical limits described above.

A full description of Scope and Boundaries and specific **exclusions** are described in EnMS article *A.4.3.1.D Scope and Boundaries*.

4.4. Energy Management System

Meeting the requirements

A description of how the EnMS meets the requirements of ISO 50001:2018 is provided in this EnMS Manual (*A.4.4.1.D EnMS Manual*) and on the electronic EnMS file system containing all EnMS documents, procedures, methodologies, records and evidence. Some evidence documents are held outside the EnMS.

Relevant Documentation for Clause 4.0

A.4.1.1.D Organisation and Context
A.4.2.1.D Interested Parties
A.4.2.2.N Legal Requirements
A.4.3.1.D Scope and Boundaries
A.4.4.1.D EnMS Manual
A.9.1.2.R Legal Review

Section En-M-5 Leadership

5.1 Leadership and Commitment

Clause 5.1 “Leadership and Commitment” and Clause 5.3 “Organisational roles, responsibilities and authorities” both cover actions by top management. Therefore their requirements have been brought together in article: *A.5.3.1.D Leadership Roles and Responsibilities* which meets the requirements of both clauses by:

- identifying Top Management by job title
- specific roles of Group Board Executive Sales and Operation and Head of FM
- description of Top Management responsibilities
- identifying the energy management team and roles
- describing the responsibilities of the energy management ream
- specifying how the energy management team is equipped for their responsibility

5.2 Energy Policy

The EnMS Energy Policy has been devised by Top Management with support from the Energy Reduction Group (ERG) which is chaired by the Energy Manager. The Energy Policy is periodically reviewed and updated, as necessary, to ensure ongoing suitability and relevance to the defined EnMS scope and boundaries. The review will take place at least annually as an agenda item in the Management Review. The Energy Policy requirement is met by *A.5.2.1.D Energy Policy* and can be found on the following page.

CORPORATE

PRIMARK EnMS ENERGY POLICY

Primark is a leading fashion retailer with stores, distribution centres and offices in Ireland, the UK, continental Europe and the USA. This policy applies to energy use in Primark stores, offices and distribution centres and for business travel in Europe and the US.

At Primark we are committed to reducing the impact that we have on the environment. Energy management and the continual improvement in energy performance are key pillars of this commitment. To this end we have established an Energy Management System (EnMS) which is certified to the globally recognised Energy Management Systems Standard, ISO 50001.

Primark's key commitments include:

- An undertaking to ensure continual improvement in energy performance that is measured by appropriate Energy Performance Indicators (EnPIs) and setting objectives and energy targets relative to agreed Energy Baselines (EBs)
- Ensuring that data, human and financial resources are made available to achieve the agreed objectives and energy targets
- Ensuring that these objectives and targets and action plans are reviewed annually
- Compliance with all relevant energy legislation and other requirements to which Primark subscribes
- Taking energy performance into account in the design and procurement of new facilities and refurbishments
- Raising employee and stakeholder awareness of the energy policy, the EnMS and their important contribution towards improving energy performance within the business

This policy has been developed and approved by the CEO and Board of Directors. As part of this management commitment we will clearly assign roles and responsibilities to all employees, contractors and suppliers engaged in the energy management process and will consider energy performance when making investment and procurement decisions.

Members of the Energy Governance Group convene on a regular basis to promote best practice, to improve the EnMS and to review energy performance.

Primark have a monitoring and internal audit programme to check compliance, improve energy performance and identify preventative and corrective actions.

We will regularly report on our energy performance against objectives and targets and will review these annually.

This policy has been made available to all employees, contractors, suppliers and interested parties and will be reviewed annually and updated as necessary.

30th March 2021

Paul Marchant, Chief Executive

[REF: EN POL 02]
[DATE: March 2021]

PRIMARK

5.3 Organisational roles, responsibilities and authorities

See Section 5.1 above.

Relevant Documentation for Clause 5.0

A.5.1.1.D Leadership Roles and Responsibilities
A.5.2.1.D Energy Policy

Section En-M-6 Planning

6.1 Actions to address risks/opportunities

This is a new requirement in ISO 50001:2018.
It is met by the EnMS article *A.6.1.1.D Risks and Opportunities*.

The article meets the requirement by:

- Identifying risks and opportunities
- Plans for actions to address risks and opportunities

6.2 Objectives, energy targets and planning to achieve them

6.2.1 Clause 6.1 has a requirement to establish, implement and maintain energy objectives and targets.

6.2.2 Energy Objectives and Targets

These shall be consistent with the energy policy and take into account legal requirements, significant energy uses, business conditions, technological options and views of interested parties.

Energy objectives and targets are documented in EnMS article *A.6.2.1.D Objectives Energy Targets* where changes are also recorded.

6.2.3 Energy Management Action Plans

Clause 6.3 has a requirement to establish, implement and maintain action plans for achieving energy objectives and targets. These plans shall include a methodology by which an improvement in energy performance is to be verified and a method of verifying the results.

The Energy Management Action Plans can be found in the EnMS article *A.6.2.2.D Energy Action Plans* and the updates recorded in A.*6.2.3.D Update of Energy Action Plans*.

6.3 Energy Review

Clause 6.3 requires a documented Energy Review.

The aim of the Energy Review is to:

a) analyse energy consumption and end use
b) identify areas of significant energy use and variables affecting energy use
c) identify, prioritise and record energy saving opportunities

The Energy Review and methodology is documented in EnMS article *A.6.3.1.D Energy Review*.

Evidence in support is given in store energy audit/survey reports, EnMS article *A.6.3.2.E Energy Audit Reports*.

A register of energy saving opportunities is provided in EnMS article *A.6.3.3.R Register of Opportunities (ROOP)*.

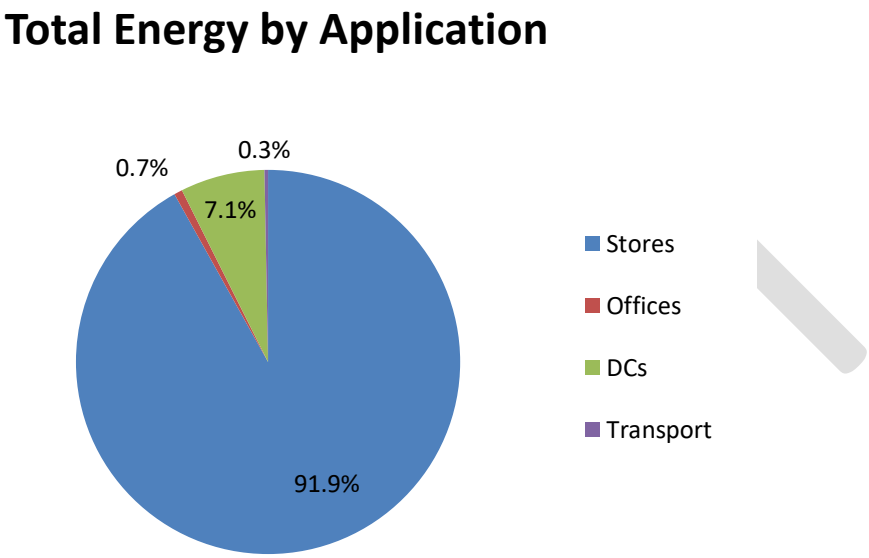
The Energy Review is updated at least annually and a record is kept in EnMS article *A.6.3.4.R Energy Review Update*.

6.4 Energy performance indicators

Clause 6.4 requires Energy Performance Indicators (EnPIs) appropriate for monitoring and measuring energy performance. The methodology for determining and updating the EnPIs shall be recorded and reviewed annually.

In Primark the term "energy intensity" is used for Energy Performance Indicators as a measure of energy performance.

Stores use 92% of energy use with 7% used in DCs and 1% in offices. Therefore significant energy use is in stores. This produces the focus for EnPIs and measurement of changes in energy performance.



6.4.1 Stores - Electricity

Three EnPIs are used for monitoring electrical energy performance:

- All periods intensity – provides overall performance indicator;
- Trading period intensity – provides indication of performance during the trading period;
- Non-Trading period intensity – provides indication of performance during the non-trading period.

In practice, over a period of years, Primark have identified these EnPIs to be the most appropriate method to monitor store electricity intensity and electricity performance. These EnPIs appear on the monthly Site Electricity Reports which are sent to each store.

A central database is maintained containing the trading times for each store, for each day since 01/01/2011, together with the respective floor areas for each day.

EnMS article *A.6.4.1.M EnPI Methodology* provides a detailed description of how these indicators are calculated.

6.4.2 Stores - Gas

Gas intensity in stores is measured using a single performance indicator, normalised for external air temperature using:

- Degree-hours during the period two-hours before trading and two-hours after trading;
- Degree hours for any time that the air temperature drops below 4°C (initiation of frost protection)

Degree-hours are calculated based on the average temperature of the three closest weather stations to each site (where data is available) with reference base value of 12°C.

This EnPI can be applied to any period, in one-day increments, but typically the periods used will be one day, one-week, one-month and one-year.

EnMS article *A.6.4.1.M EnPI Methodology* provides a detailed description of how these indicators are calculated.

6.4.3 Distribution Centres and Offices

The EnPIs used for gas and electrical consumption in distribution centres and offices is similar to those used for retail stores except the trading/non-trading split is replaced with operational/non-operational.

For offices, the operational period is taken as the notional working day 8:00 to 18:00, Monday to Friday. The non-operational period is all other times.

For distribution centres, the local operating periods will be applied.

6.4.4 EnPIs related articles

The methodology for deriving EnPIs is described in EnMS article *A.6.4.1.M EnPI Methodology*. If the EnPI methodology is updated, following a review, a summary of changes are to be recorded in the EnMS article *A.6.4.2.R EnPI Review* as well as an update of the EnPI Methodology article.

6.5 Energy Baseline

Clause 6.5 requires an energy baseline (EB) using information from the Energy Review for a data period suitable to energy use and consumption. Changes in energy performance shall be measured against the EB.

Due to the phased extension of the EnMS, different baselines have been applied to both regions and energy sources. EnMS article *A.6.3.1.D Energy Review* provides full details of the energy baselines applied to each energy source in each region.

If an adjustment is required to the EB then a record is kept and can be found in EnMS article *A.6.5.1.R Energy Baseline Update*.

6.6 Planning for collection of energy data

6.6.1 Introduction

Clause 6.6 has a requirement for methodologies for the collection of data and a data measurement plan with review. Although the clause name states “collection of energy data”, the data is not restricted to energy but any data which affects energy performance (e.g. trading hours or degree days). So the EnMS document titles use the word ‘data’ which includes energy and non energy data.

6.6.2 Data Collection Plan Methodology

This is a new requirement in ISO 50001:2018. The word ‘plan’ is interpreted as a ‘methodology’ and the requirement is met by EnMS article *A.6.6.1.M Data Collection Plan Methodology* which meets the requirement by:

- describing an Energy Data Collection Plan (Methodology)

- describing a non-Energy Data Collection Plan (Methodology)

6.6.3 Data Measurement Plan Methodology

The word 'plan' is interpreted as a 'methodology'. There is a requirement to have a data measurement plan and to define and review measurement needs to ensure accurate, reliable and repeatable data. This is met by EnMS articles:

A.6.6.2.M Data Measurement Plan Methodology
A.6.6.3.R Data Measurement Plan Review

Relevant Documentation for Clause 6.0

A.6.1.1.D Risks and Opportunities
A.6.2.1.D Objectives Energy Targets
A.6.2.2.D Energy Action Plans
A.6.2.3.D Update of Energy Action Plans
A.6.3.1.D Energy Review
A.6.3.2.E Energy Audit Reports
A.6.3.3.R Register of Opportunities (ROOP)
A.6.3.4.R Energy Review Update
A.6.4.1.M EnPI Methodology
A.6.4.2.R EnPI Review
A.6.4.3.D EnPI Values
A.6.5.1.R Energy Baseline Update
A.6.6.1.M Data Collection Plan Methodology
A.6.6.2.M Data Measurement Plan Methodology
A.6.6.3.R Data Measurement Plan Review

Section En-M-7 Support

7.1 Resources

Clause 7.1 covers the resources needed for the establishment, implementation, maintenance and continual improvement of energy performance and the EnMS.

This is covered in Section 5.1 earlier in this article and in EnMS article *A.5.5.1.D Leadership Roles and Responsibilities*.

7.2 Competence

Competence/Training

A detailed training needs analysis has been conducted which identifies those whose roles and responsibilities relate to significant energy use, see EnMS Article *A.7.1.2.D Competence Needs Analysis*. These roles are termed "Significant Energy Users" and are defined as such because their decisions impact significant energy use. The Significant Energy Users are defined as:

Head of FM
Deputy Head of FM
Energy Manager
Group Environmental and Sustainability Manager
Senior FM Manager
Head of Transport, Supply Chain
FM Regional Manager, UK-SW
FM Regional Manager, UK-N
FM Regional Manager, ROI&NI
FM Regional Manager, Northern Europe
FM Regional Manager, Southern Europe
FM Regional Manager, USA
Construction Manager UK & N Europe
Construction Manager Ireland & S Europe
Internal Auditor
Technical Bureau Manager

The competence of SEUs is defined on the basis of education, training, skills or experience. This is shown in Appendix 1 of EnMS Article *A.7.1.2.D Competence Needs Analysis*.

The training needs and course specifications for the SEUs is described in the Competence Needs Analysis. Training needs for other key persons have also been identified in the Competence Needs Analysis.

The content of the training is described can be found in EnMS article *A.7.2.2.D Competence Documentation* -which provides links for each course.

Records of training are kept and can be accessed via links in EnMS article *A.7.2.3.R SEU Competence Records*.

7.3 Awareness

Awareness (Stores)
The awareness requirement relates to all employees and contractors who are not SEUs. These are called All Energy Users (AEUs).

In stores, AEUs fall into two categories:

a) **Store Managers** which includes Deputy Store Managers, Store Energy Champions, Area Managers and Regional Controllers. This group is subject to Module 2 e-learning (High Energy Users – Stores) to meet awareness requirements in Clause 7.3. It should be noted this group are not SEUs for two reasons: as an individual their control over energy use is limited to one store. Secondly, the level of control available to Store Managers via the ERICC system is limited. See EnMS Article A.7.3.3.D *Store E Learning Awareness.*

b) **All Store Employees** (which includes the Store Managers). This group is subject to Module 1 e-learning (All Employees – Stores) to meet the awareness requirement in Clause 7.3. See EnMS Article A.7.3.3.D *Store E Learning Awareness.*

Records of store awareness delivered by e-learning can be accessed by links in EnMS article *A.7.3.4.R AEU Awareness Records*.

A summary content of e-learning Modules for stores is provided in EnMS Article *A.7.3.1.D Awareness Needs Analysis.*

A summary of recipients of Modules 1 and 2 e-learning are shown in the table below.

Role	**Module 1** **All Store Employees**	**Module 2** **High Energy Users** (Store Managers)
Store Managers, Area Managers, Regional Controllers	✓	✓
Store Employees	✓	
EnMS Management Representatives and EnMS Team	✓	✓
Other Significant Energy Users	✓	✓
EnMS Internal Auditor	✓	✓

Awareness (Distribution Centres and Offices)

For managers, staff and contractors working at distribution centres or offices, the awareness requirement is met by face-to-face training delivered using slide presentations. A summary of this training, including that for SEUs, is provided in EnMS Article *A.7.3.1.D Awareness Needs Analysis.*

The content of this awareness material can be accessed from links in EnMs article *A.7.3.2.D Awareness Documentation*.

Records of this awareness delivery can be accessed from links in the EnMS article *A.7.3.4.R AEU Awareness Records*.

7.4 Communication

Internal Communication

The meeting of the internal communication requirement is described in EnMS articles *A.7.4.1.M Communications Methodology*, *A.7.2.1.D Competence Needs Analysis* and *A.7.3.1.D Awareness Needs Analysis*. This covers how energy performance and the EnMS is internally communicated.

An employee suggestion scheme is in place which allows any employee to make a comment or make suggestions for improvements to the EnMS, energy efficiency and energy performance. A description of this suggestion scheme can be found in EnMS article *A.7.4.2.M Employee Suggestions Methodology*.

Records of employee suggestions can be accessed by a link from EnMS article *A.7.4.3.R Employee Suggestions Record*.

External Communication

The approach to external communication is described in EnMS article *A.7.4.1.M Communications Methodology*.

Relevant Documentation for Clauses 7.1, 7.2, 7.3 and 7.4

A.7.1.1.D Leadership Roles and Responsibilities
A.7.2.1.D Competence Needs Analysis
A.7.2.2.D Competence Documentation
A.7.2.3.R SEU Competence Record
A.7.3.1.D Awareness Needs Analysis
A.7.3.2.D Awareness Documentation
A.7.3.3.D Store E Learning Awareness
A.7.3.4.R AEU Awareness Records
A.7.4.1.M Communication Methodology
A.7.4.2.M Employee Suggestions Methodology
A.7.4.3.R Employee Suggestions Record

7.5 Documented Information

7.5.1 General

For the purpose of clarity and to avoid confusion between the general term 'document' and the class-type 'Document', elements of the EnMS will be referred to as 'Articles'.

The EnMS is fully documented to meet the requirement of Clause 7.5. The approach to EnMS documentation is described in EnMS article *A.7.5.2.1.M Document Methodology*.

A full list of all EnMS articles is shown in EnMS article *A.7.5.1.D Article Register*.

7.5.2 Creating and Updating

This is met by EnMS Articles:
A.7.5.2.1.M Document Methodology
A.7.5.2.2.R Document Change Record

Clause 7.5.2 requires that when creating and updating documented information, the EnMS should ensure appropriate:

a) Identification and description (e.g. title, date, author and reference number);
b) Format (e.g. language, software version, graphics) and media(e.g. paper, electronic);
c) Review and approval for suitability and adequacy.

Item a) is partially met by article names being prefixed with additional information as follows:

- Prefix 'A' indicating EnMS Article;
- ISO 50001:2018 clause reference;
- Article class –
    - Document (suffix 'D')
    - Procedure (suffix 'P')
    - Methodology (suffix 'M')
    - Record (suffix 'R')
    - Evidence (suffix 'E')

    For example: *A.6.3.1.D Energy Review*
    A indicates that it is an EnMS article
    6.3.1 indicates the article is relevant to ISO 50001:2018 Clause 6.3 "Energy Review"
    D indicates that this is a Document class

    Further information relating to the author and revision details are contained within the metadata provided as part of the electronic viewing platform.

In relation to item b) the EnMS is provided by means of an electronic viewing platform. Articles are provided in a form that can be viewed in the most commonly used browser software and also in PDF format.

Item C) is addressed by an automated process, where for an article to be generated, deleted or altered and re-issued there are three stages:

1. Change initiator: any new or amended article must be initiated by a Management Representative.
2. Checking: any new or amended article submitted for approval, must be checked by a Management Representative other than the change initiator.
3. Approval: any new or amended article once checked must be approved by a Management Representative, or the Head of FM. Once approved the viewing platform will update the appropriate articles.

All stages of this process are recorded in the metadata for an article.

Evidence articles are provided from a number of sources and are either included within special areas of the viewing platform or accessed by hyperlinks. Because these evidence articles and links are not generated specifically for the EnMS they are not classified as controllable articles within the EnMS. A number of these articles pre-date the creation of the EnMS and the links to other files and databases are provided as evidence but the material has been generated for purposes other than the EnMS, for example, e-learning records which are automatically generated as part of every Primark e-learning package, not just those related to the store modules in the EnMS. These evidence articles are not subject to the same approval process as the EnMS articles.

7.5.3 Control of documented information

The method for the control of documents is covered in EnMS Article *A.7.5.3.R Document Control Methodology*.

The EnMS file containing articles is held in the EnMS viewing platform and is accessed by user name and password. There are two EnMS files: master EnMS file to which Management Representatives have edit control. The second is non master read-only EnMS file. All EnMS documents held within the master EnMS file are deemed "controlled" articles. This is because the only persons who have edit-control are the EnMS Management Representatives who are the only people with the authority to generate a new article, delete an article or modify an existing article. Anyone else who has access to the non master EnMS file has 'read-only' access and cannot alter an article, generate or delete an article.

However, this does not apply to documents accessed by link (such as e-learning records) as these are being updated daily and act as evidence of compliance and are not central to the EnMS core structure. This also applies to evidence articles.

All hard copies of EnMS Articles are deemed 'uncontrolled' and not auditable because they are not held in the electronic EnMS file controlled by the EnMS Management Representatives.

Relevant Documentation for Clause 7.5

A.7.5.1.D Article Register
A.7.5.2.1.M Document Methodology
A.7.5.2.2.R Document Change Record
A.7.5.3.R Document Control Methodology

Section En-M-8 Operation

8.1 Operational planning and control

Clause 8.1 of ISO 50001:2018 requires identification and planning of operation and maintenance activities related to significant energy uses. For Primark this relates to significant energy use in stores. For electricity use this means lighting, HVAC, chillers and vertical transport. For stores with gas this also means gas use in space heating and hot water generation.

The methodology for the operational control and maintenance of stores is described in EnMS Article *A.8.1.1.M Operational Control and Maintenance-Methodology*.

Significant energy use in stores is largely determined by the type of equipment installed, controls, building fabric and trading hours as well as operational control and maintenance.

Store Managers have been issued with procedures on how to operate stores in an energy efficient manner. This includes generic advice across all stores and a checklist for Store Energy Champions. These procedures can be found in EnMS article *A.8.1.2.P Store Operating Procedures*.

Store Managers have some limited degree of operational control via the ERICC system as well as having access to 'on/off/manual' controls in the electrical switch room. Store Managers can call in nominated Primark maintenance contractors. Maintenance call outs fall into two main categories: reactive and planned. A reactive maintenance is further split by response times, with critical issues requiring the fastest response.. Maintenance procedures are described in EnMS article A.8.1.3.P *Maintenance Procedures*.

Additional reactive maintenance and control can be provided by the Technical Bureau, which monitors stores using the Ericc system. This system provides real-time monitoring and alarms. The Technical Bureau operators can provide remote fixes either by the adjustment of control set-points or by providing remote access to the BMS.

There is a new requirement in ISO 50001:2018 to demonstrate processes have been carried out as planned, review the consequences of unintended changes and taking actions to mitigate and adverse effects. Where any services are outsourced, the organisation shall ensure that all such services are controlled.

This requirement is met by EnMS Article *A.8.1.4.E Evidence Control of Processes*.

8.2 Design

Clause 8.2 of ISO 50001:2018 has a requirement to consider energy performance improvement opportunities and operational control on new/modified/renovated equipment/facilities that can have a significant impact on energy performance. The results of the evaluation shall be incorporated, where appropriate, into specification, design and procurement of relevant projects.

In Primark stores this relates to electricity use in lighting, HVAC, cooling and vertical transport, and to gas use for heating and domestic hot water where gas is supplied. In practice these requirements are met by energy efficiency design procedures, as described in EnMS article *A.8.2.1.M Design Methodology*, and integrating energy efficiency into electrical and mechanical standard store design codes used in all Primark new build and re-fit projects. Copies of these codes can be found in Section 8.2 of the EnMS file.

Those involved in designing activity on behalf of Primark are required to sign up and apply a design strategy method commitment to help meet Primark's energy objectives. See EnMS article *A.8.2.3.D Design Com*mitment. A copy is shown on the following pages. Records of Designer Commitment scan be accessed via links from EnMS article *A.8.2.4.R Designer Commitment Record*.

EnMS Article: A.8.2.3.D Designer Commitment

Summary: A commitment by designers working for or on behalf of Primark to adopt energy efficiency strategies in stores.

Background
Primark in the UK and Republic of Ireland have developed an EnMS compliant with ISO 50001:2018 which implements its Energy Policy with the purpose of continually improving energy efficiency and energy performance. To achieve its strategy, Primark must engage with and include its contractors, service providers, designers and equipment suppliers who can influence Primark's energy consumption and energy performance.

Designers working on behalf of Primark should note that the company takes into account energy performance as a key criteria in the procurement process of all goods and services.

Purpose
This document is to engage with designers who work for or on behalf of Primark to ensure the design process delivers optimal energy efficient outcomes for energy use in stores. It also provides a basis of understanding on how Primark conducts business in accordance with its Energy Management System (EnMS).

Commitment
Primark requires designers to engage with, and actively support, the process by committing to the following:

- We will support Primark's Energy Policy and EnMS objectives and targets.
- When designing plant, equipment, processes and systems we will ensure all our work complies with all current statutory requirements (including those relating to energy efficiency) in the relevant country.
- We will follow Primark's strategic energy efficiency methodology in the design of chillers, HVAC, lighting, vertical transport and boilers and associated systems.
- When designing/selecting energy-using equipment we will consider alternative, more energy efficient options, with costs, and advise Primark accordingly.
- We will provide design rationales to show how energy efficiency has been taken into account and how the recommended selection has been made.
- We agree to support, participate and engage in energy efficiency matters when requested by Primark in support of the EnMS.

We agree to abide by the six statements above:

Full Name: (capitals)		
Position:		
Company Name:		
Signature:		**Date:**

8.3 Procurement

Clause 8.3 requires that when procuring energy services, products and equipment that have an impact on significant energy use, the organisation shall inform suppliers that procurement is partly evaluated on the basis of energy performance.

To meet this requirement Primark send out to all suppliers of plant and equipment to stores or those tendering for such services, copies of the Energy Policy and EnMS article *A.8.3.1.D Supplier Commitment*. This article informs suppliers, or potential suppliers, that Primark take into account energy performance as a key criteria in the procurement process of all goods and services. The Supplier Commitment also contains a nine point commitment which the supplier has to agree to and sign if supplying goods and services to Primark. This includes a commitment to support Primark's Energy Policy and Store Operating Procedures. A copy appears on the following pages.

Records of Supplier Commitments can be accessed via links from EnMS article *A.8.3.2.R Supplier Commitment Record*.

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EnMS Article: D_8.3_N_Supplier_Commitment

Background:
Primark have developed an EnMS compliant with ISO 50001:2018 which implements its Energy Policy with the purpose of continually improving energy efficiency and energy performance. To achieve its strategy, Primark must engage with and include its contractors, service providers, designers and equipment suppliers who can influence Primark's energy consumption and energy performance.

Suppliers to Primark should note that the company takes into account energy performance as a key criteria in the procurement process of all goods and services.

Purpose:
This document is to engage with Primark's contractors who provide services and/or energy consuming equipment and to establish a basis of understanding on how Primark conducts business in accordance with the Energy Management System (EnMS).

Commitment:
Therefore Primark require contractors to engage with and actively support the process by committing to the following:

- We will support Primark's Energy Policy and EnMS objectives and targets.
- When working in stores we will conform to Primark's Store Operating Procedures where applicable.
- When providing or installing items, services or equipment on behalf of Primark, we will provide energy effective solutions.
- When advising, providing services, equipment or systems we will ensure all our work, services and equipment complies with all current statutory requirements (including those relating to energy efficiency) in the UK and RoI.
- When working on behalf of Primark we will never wilfully or knowingly waste Primark's energy.
- If we identify energy saving opportunities we will communicate this to our Primark contact.
- When proposing energy-using equipment we will consider alternative, more energy efficient options, with costs, and advise Primark accordingly.
- We agree to proactively support and participate and engage in energy efficiency matters where appropriate, prudent and necessary and when requested by Primark in support of the EnMS.
- We agree to implement minimum energy performance standards as part of our contract and where applicable or highlighted in our formal agreement with Primark.

We agree to abide by the nine statements above:

Full Name: (capitals)		
Position:		
Company Name:		
Signature:		**Date:**

Another requirement of Clause 8.3 is to establish and implement criteria for assessing energy use, consumption and efficiency over the planned or expected operating lifetime in equipment expected to have a significant impact on the organisation's energy performance. This requirement applies to store electricity use for lighting, HVAC, chillers and vertical transport and for where stores use gas for boilers for space heating and hot water generation.

In procuring this class of equipment two appraisal options are available:

- **Existing and Proven Technologies** – projects can be evaluated on a simple energy saving and payback basis using capital cost and predicted energy saving calculation.

- **New and unproven technologies** – a Life Cycle Cost Analysis is applied to each quote for new and unproven technologies with capital expenditure items over £10,000 (installed cost). A project lifetime of 10 years should be used. Discounted cash flow is used using Primark's standard discount rate applied equally to all projects and Net Present Values are compared taking into account maintenance, depreciation and taxes. This is described in EnMS article *A.8.3.3.P Procurement Assessment Criteria*, Records of this are in EnMS article *A.8.3.4.R Procurement Criteria Application Record*.

A third requirement in Clause 8.3 relates to defining and documenting energy purchasing specification, as applicable, for effective energy use. This clause reverse not to the procurement of energy-using equipment but to the procurement of energy itself. ISO 50001:2018 has energy performance improvement at its heart. So how energy is procured or its cost has no relevance to improving energy performance or its effective use.

The term "as appropriate" suggests this is optional and Primark considers procurement of energy as not appropriate for inclusion in its EnMS. Furthermore the terms 'carbon dioxide reduction' and 'energy cost reduction' do not appear in ISO 50001:2018.

ISO 50001:2018 covers energy reduction irrespective of where a kWh of electricity is generated or procured. The Standard applies to reduction and end-use demand. It does not cover the source of generation, its carbon content or its cost. Furthermore Primark defines the boundaries of its EnMS to be physical limits of the buildings in the scope. Therefore the energy coming through the fiscal meters is the resource to be managed. How energy is generated is upstream of the meters is outside Primark's EnMS scope. Therefore the procurement of energy itself is not within Primark's scope nor has it any relevance to ISO 50001:2018 unless Primark stated a specific energy procurement approach in its EnMS Energy Policy (which is does not). An example of this would be a commitment to procure all or a portion of electricity from renewable sources.

It is recognised that for certain types of fuel such as coal and biomass, the specification of the fuel in procurement can impact energy efficiency. For example, the cake index of coal or the moisture content of biomass. However, nearly all of Primark's energy use in buildings is from electricity and gas. For this reason it is concluded that the method of how gas and electricity is sourced/generated and procured has no impact on energy efficiency or energy performance.

ISO 5000:2018 is about reducing delivered energy (kWh), not specifically about reducing costs or CO_2, but it is acknowledged these reductions normally occur as a consequence of reducing consumption.

Relevant Documentation for Clause 8.0

A.8.1.1.M Operational Control and Maintenance Methodology
A.8.1.2.P Store Operating Procedures
A.8.1.3.P Maintenance Procedures
A.8.1.4.E Evidence Control of Processes
A.8.2.1.M Design Methodology
A.8.2.2.R Design Record
A.8.2.3.D Designer Commitment
A.8.2.4.R Designer Commitment Record
A.8.3.1.D Supplier Commitment
A.8.3.2.R Supplier Commitment Record
A.8.3.3.P Procurement Assessment Criteria
A.8.3.4.R Procurement Criteria Application Record

Section En-M-9 Performance Evaluation

9.1 Monitoring, measurement, analysis and evaluation of energy performance and the EnMS

9.1.1 General

Clause 9.1 has a requirement that key elements of its operations that determine energy performance are monitored, measured and analysed at planned intervals.

Minimum requirements are shown in points a) to e) in the table below with an explanation of how these are met.

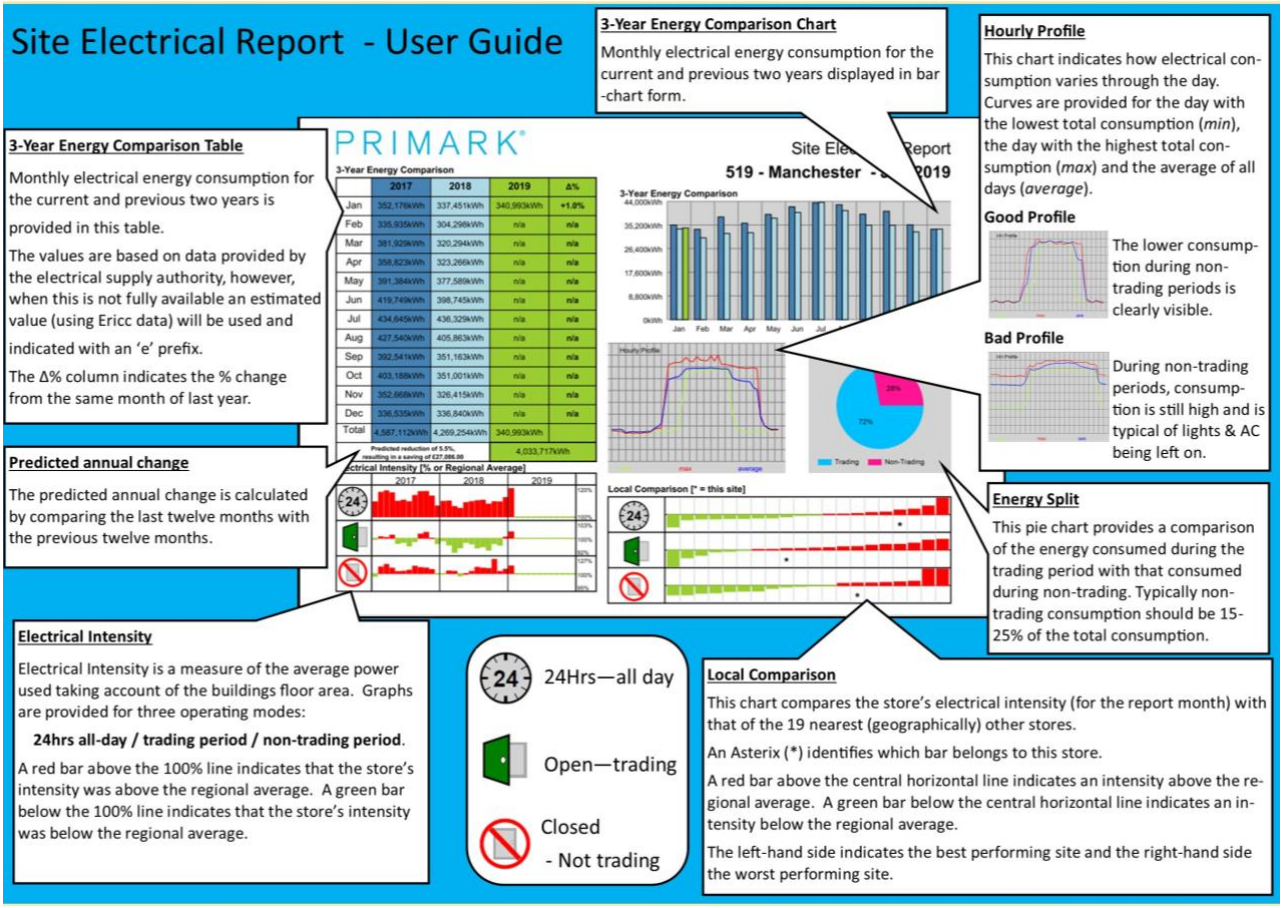
Minimum Requirements	**How met**
a) Determine what needs to be monitored and measured	*A.6.3.1.D Energy Review* *A.6.3.2.R EnPI Review*
b) Determine the methods monitoring, measuring, analysis and evaluation	*A.6.3.1.D Energy Review* *A.6.4.1.M EnPI Methodology* *A.6.4.3.D EnPI Values* *A.6.6.1M Data-Collection Plan Methodology* *A.6.6.2.M Data-Measurement Plan Methodology*
c) When the monitoring and measurement shall be performed	*A.6.4.1.M EnPI Methodology* *A.6.6.1M Data-Collection Plan Methodology* *A.6.6.2.M Data-Measurement Plan Methodology*
d) When the results from the monitoring and measurement shall be analysed and evaluated.	*A.6.3.1.D Energy Review* *A.9.1.1.2.R Site Electricity Reports (Stores)* *A.9.1.1.4.R Technical Bureau Alerts* A.9.3.2.R Management Review Input Record

EnPIs shall be compared with Energy Baselines annually as part of the *A.6.3.1.D Energy Review*.

The performance and effectiveness of the EnMS and EnPIs shall be evaluated and reviewed in accordance with *A.6.3.2.E Energy Audit Reports* and *A.6.4.2.R EnPI Review*.

Significant deviations in energy performance shall be investigated on a monthly basis as part of the Store SER review. The outcome of these investigations shall be recorded with the SER evidence documents.

Below is copy of a typical store Site Electrical Report (SER).



9.1.2 Evaluation of compliance with legal requirements and other requirements

At least once per year there will be a review of legal and other requirements related to energy use and consumption. This review will be presented as an input to the Management Review. The results of this review will be recorded in EnMS article *A.9.1.2.R Legal Review*.

This review is closely linked with the last part of Clause 4.2 "Understanding the needs and expectations of interested parties".

9.2 Internal Audit

The internal audit will take place at planned intervals according to the internal audit schedule. The internal audits will conform to Clause 9.2 requirements. The internal auditor can be an auditor from within Primark or appointed externally. The internal auditor will be independent of the day-to-day running of the EnMS, impartial, objective and be competent for the task. The training requirement to meet Internal Auditor competence is specified in the EnMS articles *A.7.2.1.D Competence Needs Analysis*.

The methodology for conducting an internal EnMS audit is described in EnMS article *A.9.2.1.M Internal Audit Methodology*.

In conducting the Internal Audit use can be made of EnMS document article *A.9.2.2.D Internal Audit Template* which describes questions to answer against each clause and sub-clause. Alternative methods and approaches can be used according to the discretion of internal auditor.

The internal auditor should summarise findings in the EnMS article *A.9.2.3.R Internal Audit Record*. The summary will include any Major or Minor Non Conformities and Observations.
Observations are recorded in *A.9.2.4.R Internal Audit Observations*.

9.3 Management Review

a) General

A formal Management Review will take place at **least annually** and be conducted by Top Management with inputs from the EnMS Management Representatives for assessments and decisions. The EnMS Management Representatives will also be responsible for recording outputs from the Management Review and implementing actions which arise.

The Management Review methodology is described in EnMS article *A.9.3.1.M Management Review Methodology*.

b) Input to Management Review

Inputs to the Management Review will be prepared by the EnMS Management Representatives and sent to top management at least 10 working days before the planned Management Review meeting date.

This will enable top management to be fully briefed on the issues specified prior to the review meeting. The inputs will include those shown in Clause 9.3.3 of ISO 50001:2018.

The inputs will be recorded in EnMS article *A.9.3.2.R Management Review Input Report.*

c) Output from Management Review

Output from the Management Review will be recorded by the EnMS Management Representatives attending the Management Review meeting. These outputs will include decisions taken and changes to be made to the EnMS. The EnMS Management Representatives will ensure the necessary actions are taken either by themselves or by others by the agreed dates.

The output will include, as a minimum, those shown in points a) to g) in Clause 9.3.4 of ISO 50001:2018.

The output will be recorded EnMS article *A.9.3.3.R Management Review Output Report*.

Relevant Documentation for Clause 9.0.

A.9.1.1.1.M Energy Monitoring Methodology
A.9.1.1.2.R Site Electricity Reports
A.9.1.1.3.P ERICC Operating Manual
A.9.1.1.4.R Technical Bureau Alerts
A.9.1.2.R Legal Review
A.9.2.1.M Internal Audit Methodology
A.9.2.2.D Internal Audit Template
A.9.2.3.R Internal Audit Record
A.9.2.4.R Internal Audit Observations
A.9.3.1.M Management Review Methodology
A.9.3.2R Management Review Input Record
A.9.3.3.R Management Review Output Record

Section En-M-10 Improvement

10.1 Nonconformity and corrective action

The methodology for dealing with identified Non Conformities is described in EnMS article *A.10.1.1.M Nonconformity Methodology*.

Each non conformity should be separately recorded on a Corrective Action Request (CAR) form, EnMS article *A.10.1.2.R Corrective Action Request (CAR)*.

This CAR will state the relevant clause and a description of the non-conformity with audit evidence. It will be signed and dated by the internal auditor and also by the person who needs to take the corrective action. A date for action completion will be given on the form.

A CAR form can also be used for identified potential non conformities in addition to actual non conformities.

A separate review shall be conducted at planned intervals to review each non conformity to investigate causes and actions to prevent reoccurrence. This review will use EnMS article *A.10.1.3.D Nonconformity Review*.

10.2 Continual Improvement

This is a new requirement in ISO 50001:2018 and is covered in EnMS Article *A.6.3.1.D Energy Review*.

Relevant Documentation for Clause 10

A.6.3.1.D Energy Review
A.10.1.1M Nonconformity Methodology
A.10.1.2.R Correction Action Request (CAR)
A.10.1.3.D Nonconformity Review