

Environmental Management System (EMS)

General Requirements

Intention and purpose

To provide an Environmental Management System (EMS) that enables all personnel working for the company, whether directly or indirectly, to carry out their duties in a manner which will preserve the environment around them and ensure that the policy statement of the company is adhered to.

The scope of the EMS will be implemented across all business streams of the company.

System controls

The EMS is made up of the Environmental Policy incorporating single-issue operational and emergency procedures for ensuring compliance.

Environmental Policy

Management at all levels of the organisation must ensure that the environmental principles listed below are followed and adhered to by all company stakeholders.

Environmental protection and enhancement

We are committed to improving the environment through the activities, products and services which we offer, and to providing them in a manner demonstrably protective of human health and the environment, even if not required by law. We will minimise and strive not to allow any release to the atmosphere, land or water in amounts that may harm human health and the environment. We will train employees in order to enhance understanding of environmental policies and procedures to promote excellence in job performance on all environmental matters.

Waste reduction, recycling and disposal

We will work to minimise the volume and toxicity of waste generated by us and others who contribute to the environmental impacts of the business. We will operate internal recycling programmes. We will vigorously pursue opportunities to recycle waste before other management practices are applied. The company will use and provide environmentally safe treatment and disposal services for waste that is not eliminated at source, or recycled.

Wise use of energy

The company will make every reasonable effort to use environmentally safe and sustainable energy sources to meet our needs. We will seek opportunities to improve energy efficiency and conservation in our operations.

Compliance

The company is committed to compliance with all legal requirements, and to implement programmes and procedures to ensure compliance. These efforts will include training and testing of employees, rewarding employees who excel in compliance, and disciplining employees who violate legal requirements.



Sustainable development

The company is fully aware that sustainable development is a key function of successful environmental management. We will ensure that the company will continually improve its environmental performance on an annual basis.

Risk reduction

The company will operate in a manner designed to minimise environmental hazards. We will encourage employees to report any condition that creates a danger to the environment or poses any potential risk, and will provide confidential means for them to do so.

Damage compensation

The company will take responsibility for any harm we cause the environment and will make every reasonable effort to remedy the damage caused to people or ecosystems.

Public policy and public education

The company will provide information for, and will assist, the public in understanding the environmental impacts of our activities. We will work with fellow companies near our facility(s) to encourage dialogue and exchange of information on facility activity. We will seek co-operation, support and advice from the government, environmental groups and other organisations when liaising with the public.

Responsibilities

This paragraph will change, dependent upon the structure as shown in the following structure chart.

Example: The person with overall responsibility for environmental issues is the managing director. The managing director will delegate the day-to-day running of environmental management to the operations manager.

Annual environmental report

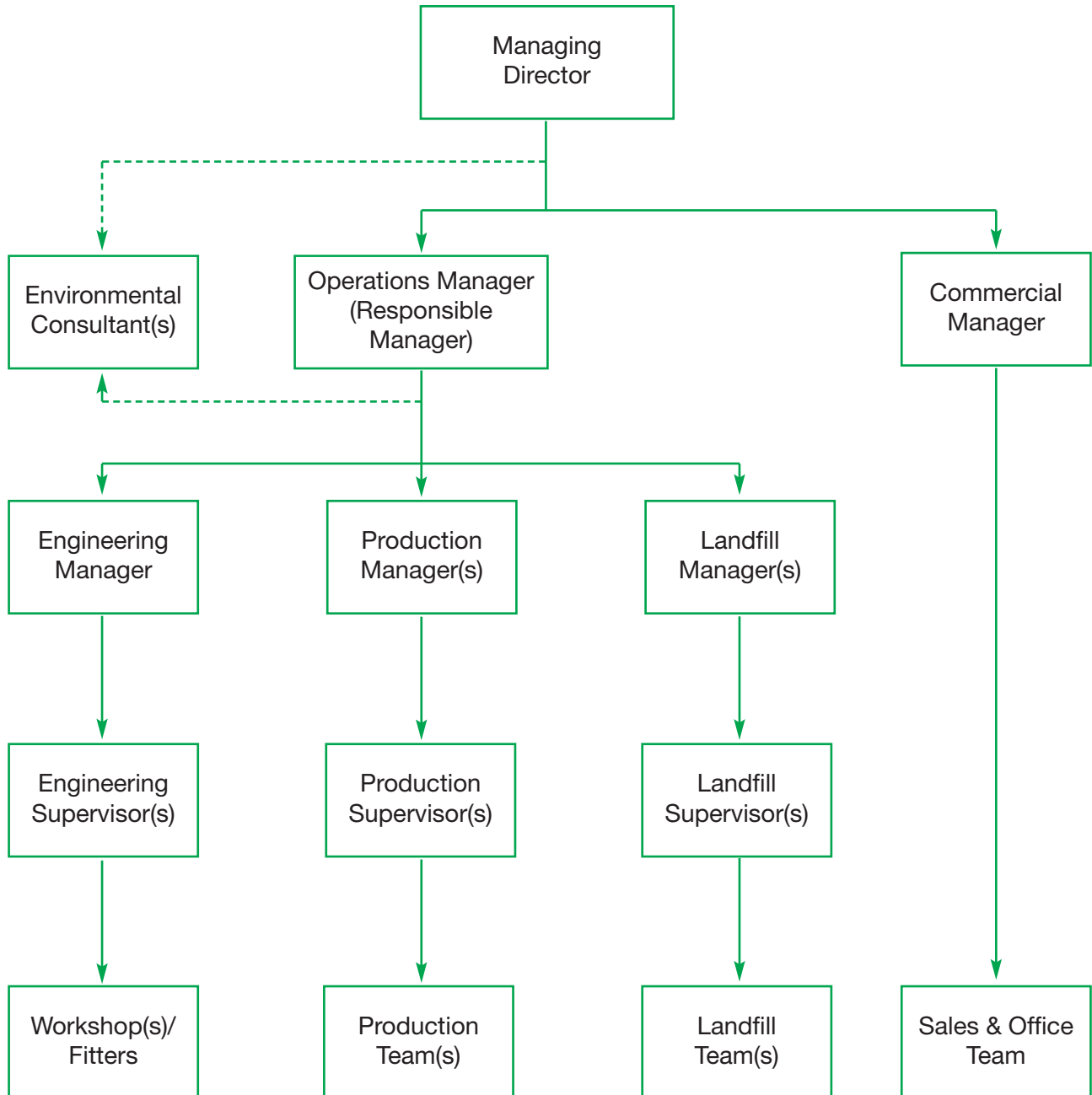
The company will participate in the preparation and publication of an annual report on the environmental activities of the company and the group. The report will include the self-evaluation of the above principles and show tools and techniques in which we measure our performance.

.....
Managing director

.....
Date



Structure Chart



Planning

Identification and evaluation of environmental aspects

The company has established and maintained procedures to identify the environmental aspects and impacts of its activities, products and services which can be expected to have a significant impact on the environment. The aspects and related significant impacts are considered when setting the environmental objectives.

It is proposed that this exercise is repeated every two years to ensure that the environmental aspects and impacts identified during the initial exercise of the company's operations remain valid.

Legal and other requirements

The company has established and maintained a procedure to identify and have access to legal and other requirements to which the company subscribes, that are applicable to the environmental aspects of its activities, products and services.

Targets and objectives

The company will establish and maintain documented environmental objectives and targets at each relevant function and level within the organisation. When establishing and reviewing its objectives, the company shall consider the legal and other requirements, its significant environmental aspects, its financial, operational and business requirements, and the views of interested parties. These objectives will be consistent with the Environmental Policy.

Environmental management programme

The company will establish and maintain a programme for achieving its targets and objectives by clearly designating specific responsibilities at all levels of the business, and stating a time frame for them to be completed by.

Implementation and Operation

Structure, responsibilities and resources

The company will designate a senior manager as the specific management representative (see structure chart), who shall have defined roles for ensuring that the EMS's requirements are established, implemented and maintained in accordance with the standard. He/she will also be responsible for reporting on the environmental performance of the management system to top management for review and as a basis for continual improvement.

Other environmental roles, responsibilities and authorities will be defined, documented and communicated in order to facilitate effective environmental management throughout the company. These will be included within individual job descriptions.

Training, awareness and competence

The company requires that all personnel whose work may create a significant impact upon the environment, will receive appropriate training. We will develop a matrix of training/competency needs for each level of employee.

We will also ensure that contractors working on behalf of the company are able to demonstrate that their employees are deemed competent, and are aware of the relevant company standards.



Consultation and communication

The company ensures that the procedure to consult and communicate with internal and external interested parties will remain effective. The procedure will outline the process for receiving, documenting and responding to all external communication.

Environmental documentation

The company ensures that it will establish and maintain information in relation to the core documents of the management system and provide direction to them. This will be kept in a paper and an electronic format.

Document and data control

The environmental documents are maintained, controlled, issued and approved by the responsible manager. This incorporates the storage of records, ensuring they are legible and identifiable, easily located and protected from damage or deterioration.

Operational control

The company will identify operations and activities which are associated with the environmental aspects and impacts. All procedures will be in line with the policy, objectives and targets. This will be extended to suppliers and contractors.

Emergency preparedness and response

The company ensures that its procedures for emergency preparedness are maintained and tested to ensure they remain effective. These procedures will be tested and reviewed periodically for effectiveness.

Checking and Corrective Action

Performance measurement and monitoring

Performance measurement will be undertaken in the following ways:

- Incident reporting – all environmental incidents will be recorded and investigated with findings communicated to all interested parties
- Inspections – daily plant, equipment and area inspections to be undertaken to monitor environmental compliance
- Auditing – conducted on a periodic basis by an independent consultant
- Calibration of equipment – to take place at specified intervals to ensure all equipment is monitored and calibrated
- Environmental key performance indicators – specified measures.

Accidents, incidents, non-conformances and corrective and preventative action

A procedure is in place to ensure that the responsibility and authority for handling and investigating non-conformances, including taking action to mitigate any impacts caused, and to implement corrective and preventative measures.



Records and record management

All records are legible and maintained in an accessible location. They will be a mixture of written documentation and electronic information.

Environmental audits

To ensure the objective evaluation of the EMS, an external audit is carried out annually by an external consultant. The audit findings will be made available to all interested parties.

Management review

Senior management will, at intervals, review the EMS to ensure its continuing suitability, adequacy and effectiveness. The review process will ensure that the necessary information is collected to allow management to carry out this evaluation. The review will be recorded.

