



BY APPOINTMENT TO
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PURVEYORS OF
FIRE PROTECTION SYSTEMS



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ENVIRONMENTAL POLICY

Table of Contents

ISO 14001 Reference	Contents	Page
1.	Scope	3
2.	Normative References	3
3.	Terms and Definitions	3
4.	Environmental Management System Requirements	5
4.1	General Requirements	5
4.2	Environmental Policy	6
4.3	Planning	8
4.3.1	Environmental Aspects	8
4.3.2	Legal and Other Requirements	8
4.3.3.	Objectives and Targets Programme(s)	9
4.4	Implementation and Operation	11
4.4.1	Resources, Roles, Responsibility and Authority	11
4.4.2	Documentation Competence, Training and Awareness	12
4.4.3	Communication	13
4.4.4	Documentation	14
4.4.5	Control of Documents	15
4.4.6	Operational Control	16
4.4.7	Emergency Preparedness and Responses	17
4.5	Checking	18
4.5.1	Monitoring and Measurement	18
4.5.2	Evaluation of Compliance	18
4.5.3	Non-conformity, Corrective Action and Preventive Action	19
4.5.4	Control of Records	20
4.5.5	Internal Audit	20
4.6	Management Review	22

1. Scope

ISO 14001 specifies the requirements for an Environmental Management System to enable an organisation to formulate and implement a policy and objectives taking into account legal and other requirements to which the organisation subscribes and information about significant environmental aspects. It applies to those environmental aspects that the organisation identifies and can control and over which it can be expected to have an influence. It does not itself state specific environmental performance criteria.

The International Standard is applicable to any organisation that wishes to: -

- a) Implement, maintain and improve an Environmental Management System
- b) Assure itself of its conformance with its stated Environmental Policy
- c) Demonstrate such conformance to others
- d) Seek certification/registration of its Environmental Management System by an external organisation.
- e) Make a self-determination and self-declaration of conformance with the International Standard

All of the requirements of the International Standard are intended to be incorporated into the Environmental Management System. The extent of the application will depend on such factors as the Environmental Policy of the organisation, the nature of its activities and the conditions in which it operates.

The scope of any application of the International standard must be clearly defined.

2. Normative References

There are no normative references at present

3. Terms & Definitions

Definitions

For the purposes of the International Standard, the following definitions apply.

3.1 Auditor

A person trained or assessed as having the competence to conduct and audit.

3.2 Continual Improvement

The recurring process of enhancing the Environmental Management System to achieve improvements in overall environmental performance in line with the organisation's Environmental Policy.

Note – The process need not take place in all areas of activity simultaneously.

3.3 Corrective Action

Action to eliminate the cause of an actual or potential non-conformity.

3.4 Document

Information and its supporting medium.

3.5 Environment

The surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Note – Surroundings in this context extend from within an organisation to the global system.

3.6 Environmental Aspect

An element of an organisation's activities, products or services that can interact with the environment.

Note – A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

3.7 Environmental Impact

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's aspects.

3.8 Environmental Management System

Part of the organisation's management system used to develop and implement its environmental policy and manage its environmental aspects

3.9 Environmental Objective

Overall Environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.

3.10 Environmental Performance

Measurable results of an organisation's management of its environmental aspects.

Note - The environmental policy provides a framework for action and for the setting of environmental objectives (3.9) and environmental targets (3.12)

3.11 Environmental policy

Overall intentions and direction of an organisation (3.16) related to its environmental performance (3.10) as formally expressed by top management.

Note – The environmental policy provides a framework for action and for the setting of environmental objectives (3.9) and environmental targets (3.12)

3.12 Environmental Target

Detailed performance requirement, applicable to the organisation (3.16) or parts thereof, that arises from the environmental objectives (3.9) and that needs to be set and met in order to achieve those objectives.

3.13 Interested Party

Any person or organisation concerned with or affected by the environmental performance (3.10) or an organisation (3.16).

3.14 Internal Audit

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization (3.16) are fulfilled.

Note – In many cases, particularly in smaller organisations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

3.15 Non conformity

Non-fulfilment of a requirement.

3.16 Organisation

Company, corporation, firm enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration.

Note – For organisations with more than one operating unit, a single operating unit may be defined as an organisation.

3.17 Preventive Action

Action to eliminate the cause of a potential non-conformity (3.15)

3.18 Prevention of Pollution

Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts (3.7).

Note – Prevention of pollution can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, re-use, recovery, re-cycling, reclamation and treatment.

3.19 Procedure

Specified way to carry out an activity or process.

Note 1 – Procedures can be documented or not.

Note 2 – Adapted from ISO 9000 : 2000, Section 3.4.5/

3.20 Record

Document stating results achieved or providing evidence of activities performed.

4. Environmental Management System Requirements

4.1 General requirements

Summary of Requirements

An Environmental Management system must be established, kept up to date and continually improved reflecting the requirements of BS EN ISO 14001 : 2004.

The organisation must define and document the scope of its Environmental Management System.

Statement/Procedures

1. BBC Fire Protection Limited (the 'Organisation') has defined its Environmental Management System, that is described in this Policy.
2. The Organisation undertakes to monitor the Environmental Management System, review its effectiveness and strive for continual improvement in pursuance of the environmental aims and objectives defined in the Organisation's Environmental Policy.
3. The scope of the Organisation's environmental certification is set out in the Organisation's Environmental Policy that is set out in Section 4.2 of this Manual.
4. The Organisation has ensured that, whenever possible, there is integration of its Quality Assurance, Health & Safety and Environmental Management Systems.

4.2 Environmental Policy

Summary of Requirements

Top management must define an Environmental Policy and ensure that, within the defined scope of its Environmental Management System, it: -

- a) Directly relates to the environmental impacts of the organisation's scope of activities, products and services.
- b) Takes into account the nature and magnitude of all such environmental impacts
- c) Commits the Organisation to take all reasonable steps to prevent pollution
- d) Commits the Organisation to continually seek improvements in its Environmental Management system
- e) Commits the organisation to compliance with all relevant legal requirements
- f) Provides a framework for setting and reviewing environmental objectives and establishes time frames for their achievement
- g) Is documented, put into practice and sustained
- h) Is introduced to all persons working for or on behalf of the Organisation
- i) Can be accessed by the public

Environmental Policy Statement

BBC Fire Protection Limited (the 'Organisation') recognises the importance of environmental protection and is committed to operating its business responsibly and in compliance with all legal requirements relating to the design, installation, commissioning and maintenance of life and property safety systems. It is the Organisation's declared policy to operate with and to maintain good relations with all regulatory bodies.

It is the Organisation's objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through the implementation of the following: -

- a) Assess and regularly re-assess the environmental effects of the Organisation's activities
- b) Training of employees in environmental issues
- c) Minimise the production of waste
- d) Minimise material wastage
- e) Minimise energy wastage
- f) Promote the use of recyclable and renewable materials
- g) Reduce and/or limit the production of pollutants to water, land and air
- h) Control noise emissions from operations
- i) Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation.

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to the public.



David Moore OPERATIONS DIRECTOR - Date: 4TH January 2018

4.3 Planning

4.3.1 Environmental Aspects

Summary of Requirements

Up to date procedures are required to identify how the Organisation's activities, products or services, within the scope of the Organisation's certification, can affect the environment and what can be done, within reason, to control and influence their impact.

The Organisation must ensure that the significant environmental aspects are taken into account in establishing, implementing and maintaining its Environmental Management System.

Statement/Procedures

1. As part of the initiation of the Environmental Management System, an Environmental Review was carried out during which the Organisation's Environmental Aspects were identified.
2. Having identified the Organisation's Environmental Aspects, those over which the Organisation can be expected to have control or influence have been identified and the significance of their environmental impacts assessed.
3. Items included in this and subsequent Environmental Reviews include, but are not limited to: -
 - a) Legal requirements
 - b) Discharges to air, land and water
 - c) Potential CoSHH and Health and Safety aspects of the materials used
 - d) Waste management
 - e) Working practices
 - f) Use of resources
 - g) Suppliers' and sub-contractors' environmental profiles.
4. As required in Section 4.6 Management Review, a full record was kept of the findings of the Environmental Review.
5. As part of the Management Review process, defined in Section 4.6, the continuing significance of these environmental aspects is confirmed and taken into account whilst maintaining the Environmental Management System.
6. As part of Management Review, the Organisation's Environmental Aspects are reviewed in order to ensure that the information is kept up to date.

4.3.2 Legal and Other Requirements

Summary of Requirements:

Up to date procedures are required to ensure that management is aware of those legal, and other relevant environmental obligations that relate to the Environmental Aspects of the Organisation's activities, products and services and determine how these requirements apply to its Environmental Aspects.

Statement/Procedures

1. The initial and all subsequent environmental reviews include a review of all existing and anticipated legislation and regulations that have, or may have, an impact on any of the Organisation's activities.
2. All relevant new legislation and regulations are reviewed as part of day to day management activities and more formally during Management Reviews, in order to establish their relevance with regard to the organisation's activities.
3. The Organisation regularly accesses the NETREGS section of the Environment Agency website that contains specific environmental information and highlights revised or anticipated legal changes that have, or may have, an impact on the Organisation's identified Environmental Aspects.
4. The Organisation maintains an up to date library of environmental publications and technical data.

4.3.3 Objectives and Target Programme(s)

Summary of Requirements

Having identified the Environmental Aspects of the Organisation's activities, products and services, realistic objectives must be set and recorded for continually improving the environmental performance of the Organisation.

A programme with associated time frames for the achievement of these objectives must be defined and established.

Responsibilities for achieving these objectives must be clearly identified.

Methods for achieving these objectives must be defined.

If a project relates to new developments and new or modified activities, products or services, the programme(s) shall be amended, whenever relevant, in order to ensure that the Organisation's environmental management addresses such projects.

When establishing and reviewing these objectives, consideration must be given to: -

- a) The Environmental Policy
- b) Statutory, regulatory and other relevant requirements
- c) The Organisation's significant environmental aspects including, as relevant: -
 - i. Air emissions
 - ii. Water discharges
 - iii. Waste management
 - iv. Land contamination

- v Sustainability of natural resources used
- vi Local and community environmental issues
- vii Technological options
- viii Financial requirements
- ix Operational requirements
- x Business requirements
- xi The view of interested parties

Statement/Procedures

- 1 As part of the Management Review process described in Section 4.6, objectives and targets are set in order to mitigate any adverse environmental impacts of the Organisation's activities.
- 2 An Environmental Programme is maintained by the Organisation identifying those activities selected from the list of significant aspects to be included in the current Programme and by a process of regular review, prioritised by the Environmental Manager, according to the Organisation's ability to reasonably control or influence environmental improvement.
3. Following every review of environmental aspects and impacts any appropriate amendments are made to the current Environmental Programme.
4. In setting the Organisation's objectives and targets the following considerations are taken into account: -
 - a) The Organisation's legal and other similar requirements
 - b) The Organisation's significant environmental aspects
 - c) The Organisation's technological options
 - d) The Organisation's financial options
 - e) The Organisation's operational options
 - f) The Organisation's business requirements
 - g) The views of external interested parties
 - h) Internal feedback
5. For every objective and target set, a programme for its achievement is defined.
6. An Environmental Risk Assessment is prepared for all activities included in the current Environmental Programme defining the following.
 - a) Objectives
 - b) Targets
 - c) Target programme including time scales
 - d) Means of achieving objectives and targets
 - e) Methods for measuring achievement of objectives and targets
 - f) Member of staff responsible for monitoring and overseeing implementation
- 7 These Environmental Risk Assessments form part of the record kept as evidence of the operation and effectiveness of the Environmental Management System.

8. Objectives, targets and Method Statements are reviewed as part of Management Review in order to ensure that the information is kept up to date.
9. Objectives, targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy Statement including its commitment to:
 - a) Prevent pollution
 - b) Control resource usage
 - c) Support environmental protection
 - d) Achieve continual improvement

4.4 Implementation and Operation

4.4.1 Resources, Roles, Responsibilities and Authority

Summary of Requirements

The roles, responsibilities and authorities for effective environmental management must be defined and recorded.

This includes the appointment of an Environmental Manager who, irrespective of other responsibilities, has the responsibility and authority for:-

- a) Implementing maintaining and improving the Environmental management System
- b) Reporting on the performance of the Environmental management System
- c) Educating staff in their roles and responsibilities concerning:
 - i. Environmental Policy and related procedures
 - ii The requirements of the Environmental Management System
 - iii Emergency preparedness and response requirements
 - iv The potential consequences of departure from specified operating procedures

Sufficient resources must be provided in order to ensure the effective establishment, implementation and control of the Environmental Management System. These may include:

- a) Adequately trained and skilled personnel
- b) Technology
- c) Financial resources

Statement/Procedures

1. The Operations Director ensures that, at all times, a nominated member of management has responsibility for promoting environmental awareness by implementing and ultimately overseeing all aspects of the Environmental Management System.
2. The Environmental Manager is required to report on all aspects of the performance of

the Environmental Management System to top management

3. The identification of revised or additional resources required to implement and improve the process of the Environmental Management System takes place as part of day to day management as well as part of the Management Review procedures described in Section 4.6
4. In addition to Management Reviews, regular informal meetings may take place. Significant issues are discussed and appropriate action is agreed and implemented, as necessary.

4.4.2 Competence, Training and Awareness

Summary of Requirements

Training needs must be identified.

All personnel, whose work may create a significant impact on the environment, must receive appropriate training.

There must be up to date procedures in place to ensure that all members of staff or sub-contractors working on the Organisation's behalf, are aware of: -

- a) The importance of conformance with the Environmental Policy and related procedures. The importance of conformance with the requirements of the Environmental Management System
- b) The significant environmental impacts, actual or potential, associated with their roles in the Organisation.
- c) The environmental benefits of improved personal performance
- e) All members of staff must be trained in: -
 - i Their roles and responsibilities with regard to the Environmental Policy and related procedures.
 - ii The requirements of the Environmental Management System
 - iii Emergency preparedness and response requirements
 - iv The potential consequences of departure from specified operating procedures
 - v Members of staff whose activities can cause significant environmental impacts must be competent to carry out the work through appropriate education, training and/or experience

Statement/Procedures

1. Environmental training needs are identified as a result of form Management Review and appraisal, as detailed in Section 4.6, and the day to day management of the Organisation. As a result of these review activities, training programmes are established to plan and control the provision of training to meet the requirements.
2. In addition to the above, Environmental Risk Assessments are reviewed and environment specific training requirements are identified and similar programmes defined.
3. Training may take the form of:

- a) Induction training
 - b) Informal work training
 - c) Formal training
 - d) Customer instructions
 - e) Supplier training
 - f) Sub-contractor training
4. Whenever a member of staff is responsible for an activity identified in an Environmental Risk Assessment as having a significant environmental impact, additional training is provided in order to ensure that the individual has the necessary skills to deal with the issue. A record of this training is maintained as part of the individual's training record.
5. As a minimum, environment specific training includes, but is not limited to: -
- a) The importance of conformance with the Environmental Policy
 - b) The importance of conformance with environmental procedures
 - c) The significant environmental impacts related to the individual's work activities
 - d) Roles and responsibilities in achieving conformance with the Environmental Policy and the environmental procedures.
 - e) Potential environmental consequences of departure from the environmental procedures.
6. Records of all environmental training are kept in accordance with the procedures set out in Section 5.2 – Human Resources and Section 4.2.4. – Control of Records in the Organisation's ISO 9001 Quality Manual.

4.4.3 Communication

Summary of Requirements

Up to date procedures must be in place to:

- a) Ensure efficient internal communication within the Organisation
- b) Receive record and effectively respond to relevant communications from external parties.

A record must be kept of all external communication and decisions reached relating to the Organisation's identified significant Environmental Aspects. When appropriate procedures will be defined to control any such communication.

Statement/Procedures

- 1 The organisation has defined the procedures relating to internal communications and documented these in the organisation's ISO 9001 Quality Manual.
2. Whenever communications relating to an environmental issue are received from an external interested party, it is passed to the Environmental Manager in the first instance. Other members of senior management may be required to provide input into investigating and responding to the issue.

3. External interested parties may include the following: -
 - a) Suppliers and sub-contractors
 - b) Customers
 - c) Regulatory bodies
 - d) Enforcement agencies
 - e) The general public
3. The details of all external communications of an environmental nature are recorded on a Management Information Report held in the Management Information File.
4. The response to external communications may be verbal or in writing dependant on the nature and urgency of the issue. In all instances, the outcome of the consideration of the communication and response is recorded on the Management Information Report.
5. Emergency planning communications are undertaken and procedures agreed in accordance with the procedures set out in Section 4.4.7.
6. Records of all environmental communications received are one of the elements addressed during Management Review.

4.4.4. Documentation

Summary of Requirements

The Environmental Management System documents can be in paper or electronic form, and must include: -

- a) The environmental policy, objectives and targets
- b) The Organisation's scope of certification
- c) A description of its core elements and their interaction
- d) Direction to any related documents.

Statement/Procedures

- 1 The Environmental Management System is defined in the following documents: -
 - a) This Environmental Manual
 - b) Environmental System Organisational Chart
 - c) Environmental System Policy Statement
 - d) The Organisation's ISO 9001 management system
 - e) Environmental and other Risk Assessments
 - f) Environmental Method Statements
 - g) CoSHH Assessments
 - h) The Organisation's library of environmental legislation and regulation and related publications
 - i) The Organisation's Health & Safety Policy.
- 2 These documents may be held as hard copy or in electronic format.

3. The Organisation's environmental objectives are defined in the Environmental Policy.
4. Effective measurement of the defined objectives is achieved by application of all relevant procedures set out in Sections 4.5 and 4.6 of this Manual relating to monitoring and evaluating compliance with the Organisation's environmental performance and analysing non-conformance issues.
5. Effective review of the defined objectives is an integral part of the Environmental Policy review as required by the procedures set out in Section 4.6 (Management Review)

4.4.5 Control of Documents

Summary of Requirements

These procedures must ensure that all current environmental Management System documents: -

- a) Can be readily located.
- b) Are periodically reviewed, revised if necessary and that all revisions are approved by authorised personnel
- c) Are available at all locations at which operations essential to the effective functioning of the Environmental Management System are carried out.

Documents must be: -

- a) Legible
- b) Dated (including the dates of revision)
- c) Easily identifiable
- d) Kept in an orderly manner
- e) Kept for a specified period

Obsolete documents must be promptly removed from all points of issue and points of use. Suitable identification must protect all such documents from unintended use.

Up to date procedures and responsibilities must be in place for drafting, adopting and changing Environmental Management System documents

Statement/Procedures

1. The Operations Director has approved this Environmental manual and the associated documents referred to in Section 4.4.4 Environmental Management System Documentation and shall approve all subsequent issues.
2. The only controlled copy of the Environmental Manual and the associated documents are those held on the Organisation's computer system and are maintained by the Environmental Manager.
3. All hard and any other electronic copies are by definition uncontrolled.
4. Proposed changes to the Environmental Manual and associated documents are

identified during the day to day activities as well as more formally during the Management Review process described in Section 4.6.

5. Proposed changes are reviewed and, if appropriate, adopted by the Environmental Manager after taking into account all of the relevant information.
6. When adopted, changes are made to the controlled copy of the Environmental manual and any associated documents and the appropriate personnel are notified of the change.
7. The integrity of the computer system and the data held on it is maintained by running background virus protection software.
8. The Organisation's computer system is regularly backed up with a copy securely stored.
9. Any archived copies of the Environmental Manual and associated documents are clearly identified as such and physically or electronically segregated in order to prevent their inadvertent use.

4.4.6 Operational Control

Summary of Requirements

All activities associated with significant environmental aspects including maintenance must be identified.

These activities must be planned in order to ensure that they are carried out under controlled conditions in accordance with the aims and objectives determined in the Organisation's Environmental Policy.

Planning and control may include: -

- a) Keeping up to date procedures to cover situations where their absence could lead to deviations from the Environmental Policy, its objectives and targets
- b) Specific operating criteria
- c) Keeping up to date documented procedures related to the significant environmental aspects of purchased goods and services
- d) Informing suppliers and contractors of all the relevant procedures and requirements.

Statement/Procedures

1. Operational control is maintained by the use of procedures set out in:
 - a) This Environmental Manual
 - b) The Organisation's ISO 9000 Quality Management System
 - c) Environmental Method Statements
 - d) The schedule of current relevant environmental legislation and regulations
 - e) Training Programmes
 - f) CoSHH Assessments and Method Statements
 - g) The Organisation's Health & Safety Policy/

2. As part of initial induction and ongoing training, staff is made aware that they are responsible for reporting environmental observations and suggestions to the Environmental manager.
3. Whenever it is considered relevant to the goods or services required, a copy of the Organisation's Environmental Policy is issued to all suppliers and sub-contractors. In addition, when appropriate, suppliers and sub-contractors are made aware of the Organisation's position relating to the environment, in particular with regard to: -
 - a) Prevention and/or mitigation of all forms of pollution
 - b) Recycling of materials
 - c) Waste management
 - d) Materials sourced from sustainable and/or renewable resources.
 - e) Support for environmental protection
4. Supplies and sub-contractors are subject to a review of their environmental performance as part of the approval process before being appointed as approved suppliers. Procedures relating to the approval process and criteria for approval are as set out in Section 7.4 – Purchasing of the Organisation's ISO 9001 Quality Manual.

4.4.7 Emergency Preparedness and Response

Summary of Requirements

Up to date procedures must be in place to identify potential emergency situations and potential accidents that can have an impact on the environment, and how the Organisation will respond to them.

Up to date procedures and in particular after the occurrence of an accident or emergency these procedures must be tested, reviewed and revised.

Statement/Procedures

1. The potential for and response to accidents and emergency situations are identified during the reparation of the Environmental Programmed undertaken as a component of the Environmental Management System, that is set out in this Environmental Manual
2. Prior to or at the start of every project, any additional project specific potential accident and/or emergency situations are also identified.
3. Whenever the potential for accidents and emergency situations is identified, the Environmental Risk Assessment defines the Method Statement to prevent or mitigate any adverse environmental impact of the occurrence.
4. As far is practicable, accident and emergency response procedures are periodically tested in order to ensure that the required prevention or mitigation of any adverse environmental impact is achieved. A record of the testing is maintained.
5. A Health & Safety File is maintained with master copies of all related documents. The file is freely available to all staff including field engineers via the Organisation's

intranet.

6. Existing procedures are reviewed and revised following any unexpected incident having a significant environmental impact.

4.5 Checking

4.5.1 Monitoring and Measurement

Summary of Requirements

Up to date documented procedures must be maintained to monitor and measure the achievement of the Organisation's environmental Objectives and targets.

Whenever appropriate, monitoring equipment must be calibrated and maintained. Records of all such calibrations must be maintained.

Up to date documented procedures must be kept to periodically confirm adherence to the relevant environmental legal requirements.

Statement/Procedures

1. Objectives and targets are established as a result of Environmental Risk Assessment activities. Whenever quantifiable targets are identified and agreed, the means of monitoring and measuring their achievement is included in that section of the Environmental Risk Assessment document.
2. Responsibility for monitoring the level of achievement in reaching the identified targets is assigned to a member of senior management. The Environmental Risk Assessment document relating to the activity is marked with the name of the person responsible.
3. Whenever monitoring activities identify significant deviation from the objectives and targets defined in the Environmental Risk Assessments, a Management Information Report is raised and used to record and control the occurrence.
4. At present the Organisation has not identified, and considers that it is unlikely to set or have imposed, any objectives and targets that require monitoring by fine tolerance measuring instruments.
5. The Management Review process continuously monitors this situation. Should such requirements become applicable, the organisation will develop, document and implement appropriate procedures by the application of the procedures set out in Section 7.6 – Control of Monitoring and Measurement Devices of the Organisation's ISO 9001 Quality Manual.
6. Management Review activities include a review of compliance with the relevant Environmental Risk Assessment records.

4.5.2. Evaluation of Compliance

Summary of Requirements

Up to date procedures are required to ensure that management is aware of and implements those legal, and other relevant environmental obligations, that relate to the environmental aspects of the Organisation's activities, products and services. The Organisation shall ensure that it periodically evaluates and can demonstrate compliance consistent with its Environmental Policy commitments and maintain records of all such evaluations.

Statement/Procedures

1. The Environmental Manager ensures that a regular review of the Organisation's compliance with its legal requirements is carried out and appropriate records are maintained.
2. Management Review activities include a review of all significant findings identified during such compliance reviews.

4.5.3 Non-conformity, Corrective Action and Preventive Action

Summary of Requirements

Up to date procedures must be in place to allocate to individual members of staff defined responsibility and authority for: -

- a) Handling and investigating actual and potential non-conformance
- b) Taking action to mitigate any impacts caused
- c) Initiating and completing corrective and preventive action

Corrective or preventive actions must be appropriate to the magnitude of the problem and its impacts.

Any changes in documented procedures resulting from corrective and preventive actions must be recorded and circulated to the appropriate members of staff and other interested parties.

Statement/Procedures

1. Non-conformances relating to the Environmental management System are brought to the attention of a member of the Environmental Team.
2. Such non-conformances are investigated in order to identify their cause.
3. Corrective action is taken to rectify the results of the non-conformance appropriate to the magnitude of the problem and commensurate with the environmental impact encountered.
4. Corrective or preventive action may take the form of restraining, disciplining, amendment of elements of the Environmental Action Plan and/or this Environmental manual.

5. A record of the incident including details of the corrective and preventive action taken is kept on a Management Information Report that is clearly identified as 'Environmental' and its cause and effect are subject to Management Review in addition to routine monitoring.
6. The collective actions taken to prevent recurrence of non-conformances, and Management Information Reports generated, are regularly reviewed with all significant observations reported to Management Review Meetings in order to identify and trends and to determine the effectiveness or preventive measures taken.
7. Revised procedures are developed and implemented as considered appropriate and are reviewed accordingly.

4.5.4 Control of Records

Summary of Requirements

Up to date procedures must be in place to ensure that environmental records are: -

- a) Legible
- b) Identifiable
- c) Traceable
- d) Readily retrievable
- e) Protected against damage, deterioration and/or loss
- f) Retained for an agreed time

The records to be maintained must be:

- a) Appropriate to the Environmental management System
- b) Appropriate to the Organisation
- c) Demonstrate conformance to the requirements of the International Standard

Statement/Procedures

1. The following records and similar documents are kept for a minimum of two years in order to demonstrate conformance to the requirements of BS EN ISO 14001 :2004: -
 - a) Management Review Records
 - b) Communications of an environmental nature from, and responses to, external interested parties
 - c) Monitoring and measurement records
 - d) Non-conformance records
 - e) Corrective and preventive action records
 - f) Environmental Audit records
 - g) Environmental Risk Assessments
2. The Organisation's storage system, both in electronic and hard copy, ensures that all environmental records and similar documents are adequately protected, remain legible and identifiable. Records are stored and maintained in a manner to make them readily retrievable, in facilities that provide an environment to minimise deterioration

or damage and to prevent loss.

4.5.5. Internal Audit

Summary of Requirements

There must be a programme and up to date procedures to check (audit) that the Environmental Management System: -

- a) Reflects the Organisation's requirements for environmental management
- b) Reflects the requirements of the International Standard
- c) Is being properly operated and maintained up to date

The results of all Environmental Audits must be passed to management.

The Environmental Audit programme should reflect the:

- a) Environmental importance of the activity concerned
- b) Results of previous Environmental Audits

Environmental Audit procedures must address: -

- a) The audit scope
- b) Audit frequency
- c) Audit methodologies
- d) Responsibilities and requirements for conducting audits and reporting results.

Statement/Procedures

1. There are up to date procedures and a programme to check (audit) that the Environmental Management System: -

- a) Reflects the Organisation's requirements for environmental management
- b) Reflects the requirements of the International Standard
- c) Is being properly operated and maintained up to date

The results of all Environmental Audits are passed to management.

The Environmental Audit programme reflects the: -

- a) Environmental importance of the activity concerned
- b) Results of previous Environmental Audits.

Environmental Audit procedures address: -

- a) The audit scope
- b) Audit frequency
- c) Audit methodologies
- d) Responsibilities and requirements for conducting audits and reporting results.

2. An Environmental Audit Programme is maintained by the Environmental Manager ensuring that every section of the Environmental Management System is verified a least annually.
3. More frequent Environmental Audits may be organised by the Environmental Manager depending on the importance of the activities being audited.
4. Internal Environmental Audits are carried out according to the following procedures: -
5. At the beginning of every month, the Environmental Manager consults the Environmental Audit programme and establishes which, if any, parts of the Environmental Management System are to be audited during the coming month.
6. A member of staff, wherever possible independent of the activity to be audited, is appointed by the Environmental Manager.
7. The auditor refers to this Manual and determines the activities to be audited.
8. The auditor selects a representative number of records to be audited on a random basis.
9. The auditor advises any personnel concerned that an Environmental Audit is being undertaken and answers any questions they may have regarding the audit.
10. The auditor examines the records selected in order to determine whether the activities identified above have been carried out correctly.
11. Objectives, targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy Statement including its commitment to: -
 - a) Prevent pollution
 - b) Control Resource usage
 - c) Support environmental protection
 - d) Achieve continual improvement
12. The Environmental Audit record and all other documents relating to internal audits are passed to the Environmental Manager.
13. The Environmental Audit record and all other documents relating to internal Environmental Audits are retained for inspection by QMS International Plc at the annual external Environmental Audit.
14. All issues arising from the internal Environmental Audit requiring immediate attention are discussed with the appropriate personnel and a record kept on an Environmental Audit Report or Management Information Report as appropriate.
15. The Environmental Manager ensures that the Environmental Audit results are discussed at the next Management Review.

4.6 Management Review

Summary of Requirements

At defined intervals, management must review the Environmental Management System in order to ensure that it continues to be: -

- a) Suitable
- b) Adequate
- c) Effective

The Management Review process must ensure that the necessary information is available to allow management to carry out this review.

The Management Review must be documented.

The Management Review must investigate the possibility that changes may be required to: -

- a) Environmental Policy
- b) Environmental objectives
- c) Other elements of the Environmental Management System

These changes may result from: -

- a) The results of Environmental Management System Audits
- b) Changing circumstances
- c) The commitment to continual improvement

Statement/Procedures

1. An Environmental Management Review is carried out at not greater than 12 monthly intervals. If appropriate, a corrective and preventive action plan is formulated.
2. Environmental Management Review meetings may be held
3. Specific items included on the agenda of every Management Review are: -
 - a) The continuing relevance of the Environmental Programme
 - b) Changing environmental aspects and impacts of the Organisation's activities
 - c) Internal feedback
 - d) Results of the monitoring and measurement of achievement of environmental objectives, targets and programmes
 - e) Communications relating to environmental issues received from external interested parties
 - f) Changing Government Policy and National, EU and International environmental legislation, regulation and directives.
 - f) The availability of new technology
 - h) The effectiveness of corrective and preventive actions
 - i) Environmental Audit findings
4. Records of the findings of the Management Review and any planned action are kept

for a minimum period of two years as part of the Organisation's environmental record system.

5. Records made available at Management Reviews include: -
 - a) Record of previous Management Reviews
 - b) Communications from external interested parties
 - c) Monitoring and measurement records
 - d) Non-conformance records
 - e) Corrective and preventive action records
 - f) Environmental Audit records

6. A detailed record is kept of the proceedings of the Management Review and the record and/or appropriate extracts thereof are circulated to all appropriate members of the Organisation.