

FLOW SOLUTIONS UK LTD

ENVIRONMENTAL MANUAL

Unit J

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MANUAL IDENTIFICATION

Copy Number:.....of.....

Issued to.....

Title.....

Signed:.....

Environmental Manager

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REVISION AND AMENDMENT REGISTER

DATE	PAGE NUMBER	PROCEDURE NUMBER	REVISION DETAILS	ISSUE NUMBER
14.01.2019	p.57	9.3.1	Management meetings are held twice a year.	1.1.
10.06.2019	p.54	9.2.8	Due to small size of the company, the Internal audit frequency changed to twice per year instead of being performed monthly	1.2
21.01.2020	p.54	9.1.2.1	Due to small size of the company the organisation's obligations review frequency changed from three-monthly to twice a year.	1.3
24.01.2020	p.45	7.5.14	The retention of records changed from minimum 5 years to 12 months or as required by legal, regulatory and contractual requirements, whichever is the longer.	1.4

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FOREWORD

This Environmental Manual is the means by which Flow Solutions UK Ltd (the 'Organisation') satisfies the requirements of ISO 14001 : 2015 ('the International Standard').

The Organisation is obliged to ensure that its Environmental Policy is fully and completely understood by its employees, and that its procedures are implemented and maintained at all times. This Environmental Manual is in accordance with the requirements of **BS EN ISO 14001 : 2015**. All of the components of the Environmental Management System shall be periodically and systematically reviewed by both internal and external Environmental Audit procedures.

The Environmental Manager, appointed by the Organisation's Managing Director, is responsible for the control of all matters relating to the implementation of these procedures.

The assurance of environmental compliance is fundamental to all the work undertaken by the Organisation. All personnel at every level in the Organisation's structure shall practise the procedures established.

The potential benefits to the Organisation of implementing this Environmental Management System are:

- a) To protect the environment by preventing or mitigating adverse Environmental Impacts
- b) To mitigate the potential adverse effect of environmental conditions on the Organisation
- c) To assist the Organisation in the fulfilment of compliance obligations
- d) To enhance environmental performance
- e) To control or influence the way the Organisation's products and services are designed, manufactured, distributed, consumed and disposed of by using a life cycle perspective that can prevent Environmental Impacts from being unintentionally shifted elsewhere within the life cycle
- f) To achieve financial and operational benefits that can result from implementing environmentally sound alternatives that strengthen the Organisation's market position
- g) To communicate environmental information to relevant interested parties.

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PROFILE

Flow is a leading fulfilment and mailing specialist. We make our clients' direct mail and marketing projects highly responsive with measurable results that increase your ROI.

With our comprehensive range of mailing services we'll reduce your costs and make marketing easy for your business. We provide everything, including graphic design, digital printing and warehouse management systems.

At Flow achieving for our clients is at the top of our list. We pride ourselves on our drive and ambition as problem solvers. We see challenges and opportunities in the enormous variety of work we're privileged to receive.

Flow aims to make as little impact on the environment as possible and all our teams share our commitment. That's why waste is separated and wherever possible, it's re-used in line with our environmental policy. What's more, we only choose products with a recycled content that doesn't compromise performance or commercial viability. In supporting these practices we've qualified for Green Post discounts and are delighted to pass these savings on to you.

We understand not everyone fits neatly together. At Flow we're selective with our clients and seek to establish relationships founded on common ethics, business approach and service areas we excel in. Such relationships lead to an intuitive understanding and trust that we believe is essential to succeed in our industry.

To showcase our innovation and success, we've created a collection of case studies. They demonstrate how we've positively affected our clients, helped them solve specific problems and achieve their goals. Why not bring your problems to us and maybe we can help you solve yours

We work hard to meet the challenges our clients set us every day. It's even more rewarding when all that effort is recognised.

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ENVIRONMENTAL POLICY

Flow Solutions UK Ltd (the 'Organisation') recognises the importance of environmental protection and is committed to operating its business responsibly and in fulfilment of its compliance obligations relating to the provision of printing, direct mail marketing and fulfilment services to industry. 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, to protect the environment and to continually improve the Environmental Management System to enhance 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) Prevent pollution in all its forms
- h) Control noise emissions from operations
- i) Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation.

Top management demonstrates leadership and commitment with respect to the Environmental Management System by:

- a) Taking accountability for the effectiveness of the Environmental Management System
- b) Ensuring that the Environmental Policy and Environmental Objectives are established and are compatible with the strategic direction and the context of the Organisation
- c) Ensuring the integration of the Environmental Management System requirements into the Organisation's business processes
- d) Ensuring that the resources needed for the Environmental Management System are available
- e) Communicating the importance of effective environmental management and of conforming to the environmental management system requirements
- f) Ensuring that the Environmental Management System achieves its intended outcomes
- g) Directing and supporting persons to contribute to the effectiveness of the environmental management system
- h) Promoting continual improvement
- i) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

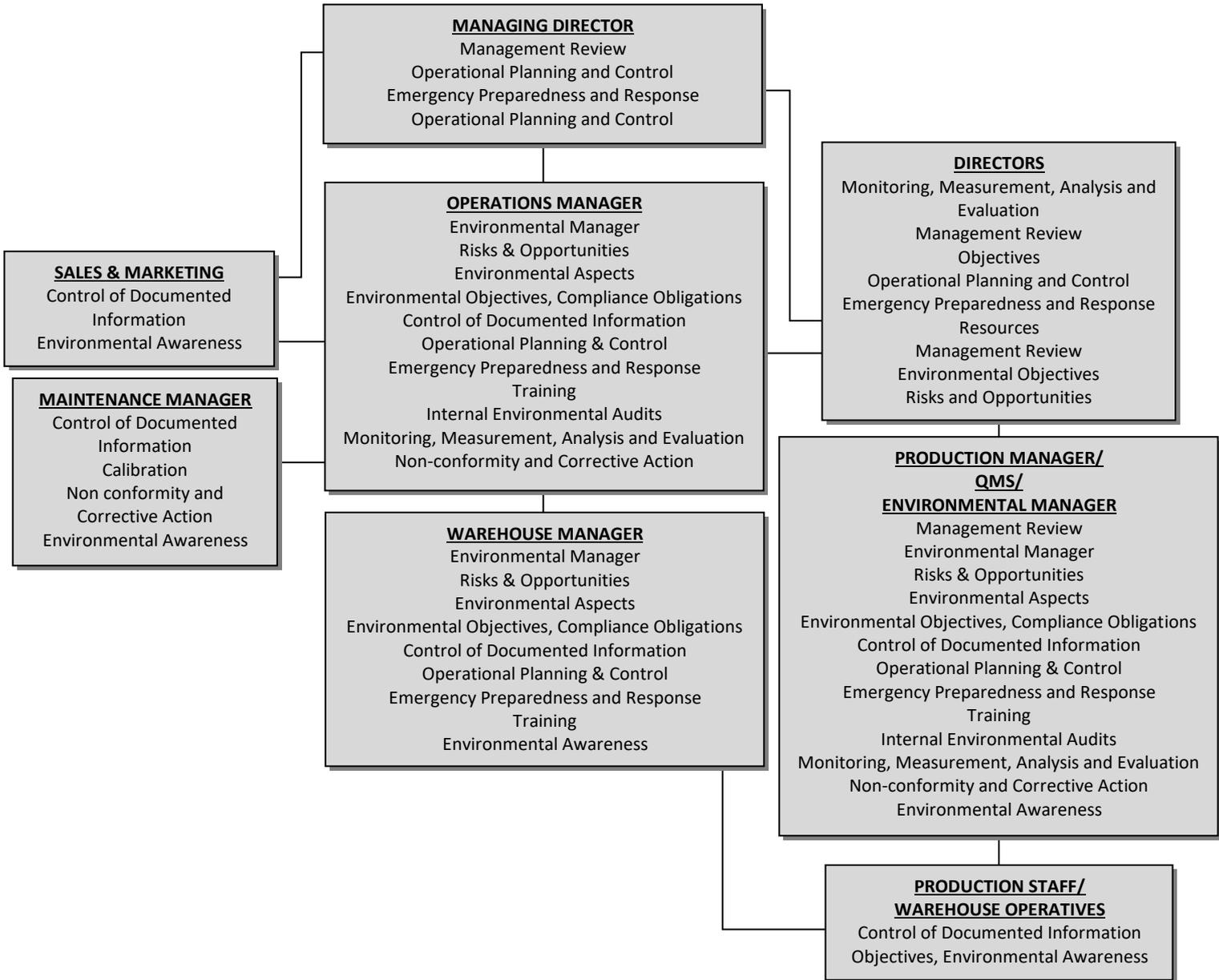
This Policy is communicated to all employees, suppliers and sub-contractors and is made available to interested parties.

Date Of Issue:	Signed:
Date Of Next Review:	Print Name:

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ENVIRONMENTAL STRUCTURE CHART



This chart establishes responsibilities and lines of internal communication within the Environmental Management System and does not necessarily portray other management structures.

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1 - SCOPE

The scope of the Organisation's certification is defined within the Environmental Policy and is recorded on the ISO 14001 Certificate. As a minimum this Environmental Manual addresses all requirements for conformance with BS EN ISO 14001 : 2015 in pursuit of any activities falling within the scope of its certification.

The International Standard specifies the requirements for an Environmental Management System that an organisation can use to enhance its environmental performance. The International Standard is intended for use by an organisation seeking to manage its environmental responsibilities in a systematic manner that contributes to the environmental pillar of sustainability.

The International Standard helps an organisation to achieve the intended outcomes of its Environmental Management System, which provide value for the environment, the Organisation itself and interested parties. Consistent with the Organisation's Environmental Policy, the intended outcomes of the Environmental Management System include:

- a) Enhancement of environmental performance
- b) Fulfilment of compliance obligations
- c) Achievement of Environmental Objectives.

The International Standard is applicable to any organisation, regardless of size, type and nature, and applies to the Environmental Aspects of its activities, products and services that the organisation determines it can either control or influence considering a life cycle perspective. The International Standard does not state specific environmental performance criteria.

The International Standard can be used in whole or in part to systematically improve environmental management. Claims of conformity to this International Standard, however, are not acceptable unless all its requirements are incorporated into the Organisation's Environmental Management System and fulfilled without exclusion.

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2 - NORMATIVE REFERENCES

At the time that this Environmental Manual was prepared, there were no normative references.

Parties to agreements based on ISO 14001 : 2015 are encouraged to adopt the amendments contained in any subsequent editions of the International Standard that may be published. Members of ISO and IEC maintain registers of currently valid International Standards.

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3 - TERMS AND DEFINITIONS

3.1 Terms related to organisation and leadership

3.1.1 Management System

Set of interrelated or interacting elements of an *organisation* (3.1.4) to establish policies and *objectives* (3.2.5) and *processes* (3.3.5) to achieve those objectives.

3.1.2 Environmental Management System

Part of the *management system* (3.1.1) used to manage *Environmental Aspects* (3.2.2), fulfil *compliance obligations* (3.2.9), and address *risks and opportunities* (3.2.11).

3.1.3 Environmental policy

Intentions and direction of an *organisation* (3.1.4) related to *environmental performance* (3.4.11), as formally expressed by its *top management* (3.1.5).

3.1.4 Organisation

Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its *objectives* (3.2.5).

3.1.5 Top management

Person or group of people that directs and controls an *organisation* (3.1.4) at the highest level.

3.1.6 Interested party

Person or *organisation* (3.1.4) that can affect, be affected by, or perceive itself to be affected by a decision or activity.

3.2 Terms related to planning

3.2.1 Environment

Surroundings in which an *organisation* (3.1.4) operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

3.2.2 Environmental Aspect

Element of an *organisation's* (3.1.4) activities or products or services that interacts or can interact with the *environment* (3.2.1).

3.2.3 Environmental condition

State or characteristic of the *environment* (3.2.1) as determined at a certain point in time.

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3 - TERMS AND DEFINITIONS (continued)

3.2.4 Environmental Impact

Change to the *environment* (3.2.1), whether adverse or beneficial, wholly or partially resulting from an *organisation's* (3.1.4) *Environmental Aspects* (3.2.2).

3.2.5 Objective

Result to be achieved.

3.2.6 Environmental Objective

Objective (3.2.5) set by the *organisation* (3.1.4) consistent with its *Environmental Policy* (3.1.3).

3.2.7 Prevention of pollution

Use of *processes* (3.3.5), 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* (3.2.4).

3.2.8 Requirement

Need or expectation that is stated, generally implied or obligatory.

3.2.9 Compliance obligations (preferred term)

Legal requirements and other requirements (admitted term)

Legal *requirements* (3.2.8) that an *organisation* (3.1.4) has to comply with and other requirements that an organisation has to or chooses to comply with.

3.2.10 Risk

Effect of uncertainty.

3.2.11 Risks and opportunities

Potential adverse effects (threats) and potential beneficial effects (opportunities).

3.3 Terms related to support and operation

3.3.1 Competence

Ability to apply knowledge and skills to achieve intended results.

3.3.2 Documented information

Information required to be controlled and maintained by an *organisation* (3.1.4) and the medium on which it is contained.

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3 - TERMS AND DEFINITIONS (continued)

3.3.3 Life cycle

Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

3.3.4 Outsource (verb)

Make an arrangement where an external *organisation* (3.1.4) performs part of an organisation's function or *process* (3.3.5).

3.3.5 Process

Set of interrelated or interacting activities which transforms inputs into outputs.

3.4 Terms related to performance evaluation and improvement

3.4.1 Audit

Systematic, independent and documented *process* (3.3.5) for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

3.4.2 Conformity

Fulfilment of a *requirement* (3.2.8).

3.4.3 Non-conformity

Non-fulfilment of a *requirement* (3.2.8).

3.4.4 Corrective action

Action to eliminate the cause of a *non-conformity* (3.4.3) and to prevent recurrence.

3.4.5 Continual improvement

Recurring activity to enhance *performance* (3.4.10).

3.4.6 Effectiveness

Extent to which planned activities are realised and planned results achieved.

3.4.7 Indicator

Measurable representation of the condition or status of operations, management or conditions.

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3 - TERMS AND DEFINITIONS (continued)

3.4.8 Monitoring

Determining the status of a system, a *process* (3.3.5) or an activity.

3.4.9 Measurement

Process (3.3.5) to determine a value.

3.4.10 Performance

Measurable result.

3.4.11 Environmental performance

Performance (3.4.10) related to the management of *Environmental Aspects* (3.2.2).

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4 - CONTEXT OF THE ORGANISATION

4.1	Understanding the Organisation and its context
Summary of Requirements	External and internal issues relevant to the Organisation's purpose and having a bearing on its ability to accomplish the intended outcomes of its Environmental Management System shall be determined, e.g. issues such as environmental conditions which either affect or may potentially affect the Organisation.

	STATEMENT/PROCEDURE
1.	<p>The Organisation's external context has been evaluated and documented, taking into account such factors as:</p> <ol style="list-style-type: none"> 1. Environmental conditions under which the Organisation operates 2. The social and cultural environment 3. The political environment 4. The legal and regulatory environment 5. The market environment 6. The technological environment 7. The economic environment 8. The natural environment 9. The competitive environment 10. The geographical scope of each environment 11. Key drivers and trends.
2.	<p>The Organisation's internal context, within which it seeks to achieve its objectives, has been evaluated and documented, taking into account such factors as:</p> <ol style="list-style-type: none"> 1. Governance 2. Organisational structure, roles and accountabilities 3. Policies, objectives and the strategies that are in place to achieve them 4. Capabilities, in terms of resources and knowledge 5. Information systems, information flows and decision-making processes 6. Organisational culture 7. Standards, guidelines and models 8. Contractual relationships.

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4 - CONTEXT OF THE ORGANISATION

4.1	Understanding the Organisation and its context (continued)
3.	The external and internal context is reviewed at least annually and the documentation updated accordingly.

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4 - CONTEXT OF THE ORGANISATION

4.2	Understanding the needs and expectations of interested parties
Summary of Requirements	<p>The Organisation is to determine the following:</p> <ul style="list-style-type: none"> a) Any interested parties playing a role in the Environmental Management System b) Any related needs or expectations (i.e. requirements) of these interested parties c) Which of these needs and expectations are effectively its compliance obligations.

	STATEMENT/PROCEDURE
1.	<p>The interested parties that are relevant to the Environmental Management System are defined as:</p> <ul style="list-style-type: none"> 1. Customers 2. Employees 3. Suppliers 4. Management 5. Statutory and Regulatory bodies 6. Environment Agency (EA) 7. Industry and related associations 8. IPIA (independent Print Industries Association) 9. Inspection and test providers.
2.	<p>The significant needs and expectations of these interested parties include:</p> <ul style="list-style-type: none"> 1. A safe, compliant and pleasant working environment 2. Adherence to legal and regulatory requirements, including the site-specific planning and permit requirements 3. Adherence to requirements of the Interested Parties listed above. 4. Achievement of business targets.
3.	<p>The Organisation's compliance obligations have been determined and are documented in the Organisation Management System Manuals, as detailed in this Manual.</p>

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4 - CONTEXT OF THE ORGANISATION

4.3	Determining the scope of the Environmental Management System
Summary of Requirements	<p>The limitations and applicability of the Environmental Management System are to be determined to set out its scope.</p> <p>The Organisation shall consider the following when determining this scope:</p> <ul style="list-style-type: none">a) Any external or internal issues cited in 4.1b) The compliance obligations cited in 4.2c) The Organisation's units, functions and physical confinesd) Activities and services carried out and products produced by the Organisatione) The Organisation's authority and capacity to carry out any activities related to control and influence. <p>Having defined the scope, the Environmental Management System is to include all of the Organisation's activities, products and services within that scope.</p> <p>Interested parties requiring access to the scope are to be granted this and it is to be kept as documented information and made available.</p>

	STATEMENT/PROCEDURE
1.	<p>Taking into account the output from Sections 4.1 and 4.2 above, along with the activities, products and services of the Organisation, management ensures that this Environmental Manual includes:</p> <ul style="list-style-type: none">1. The defined scope of the Environmental Management System with any non-applicable clauses identified and justified2. Documented procedures or reference to them within other documents3. A description of the interaction of processes.
2.	<p>Effective implementation of the Environmental Management System is monitored on an informal basis, as part of the Organisation's day-to-day operations.</p>

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4 - CONTEXT OF THE ORGANISATION

4.4	Environmental Management System
Summary of Requirements	<p>The Organisation shall set out, put into practice, maintain and continue to improve an Environmental Management System in order to realise its intended outcomes; these include the improvement of the Organisation's environmental performance. The Environmental Management System should detail any necessary procedures and the way in which they interrelate which should be in keeping with the obligations laid out by the International Standard.</p> <p>When setting up and maintaining the Environmental Management System, any information gained in 4.1 and 4.2 shall be considered by the Organisation.</p>

	STATEMENT/PROCEDURE
1.	<p>As part of the implementation of this Environmental Management System, and bearing in mind the knowledge gained from Sections 4.1 and 4.2, the Organisation has identified and documented in this Manual:</p> <ol style="list-style-type: none">1. The processes needed for the Environmental Management System2. The sequence and interaction of these processes3. The criteria and methods used to ensure the effective operation and control of these processes, including responsibilities and authorities4. The means to ensure the availability of the resources and the information necessary to support the operation, monitoring and continual improvement of these processes5. The risks and opportunities as determined in accordance with the requirements of Section 6.16. The processes used to measure where applicable, monitor and analyse these processes and implement action necessary to achieve planned results and monitor continual improvement.

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4 - CONTEXT OF THE ORGANISATION

4.4	Environmental Management System (continued)
2.	<p>The Environmental Management System is based on the following process model:</p>
3.	<p>As part of the Management Review process, the Organisation reviews the Environmental Management System and, when required, makes changes in order to ensure that it continues to meet management requirements and market conditions.</p>

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5 - LEADERSHIP

5.1	Leadership and commitment
Summary of Requirements	<p>Necessary commitment and leadership shall be put into effect by top management regarding the Environmental Management System through the following:</p> <ul style="list-style-type: none"> a) The acceptance of responsibility for the effective use of the Environmental Management System b) The Environmental Policy and Environmental Objectives should be set out and in keeping with the strategic direction of the Organisation and the nature of the Organisation's activities c) The Organisation should ensure that any obligations within the Environmental Management System are integrated into the Organisation's own procedures d) There should be easy access to any resources required for the Environmental Management System e) The role of good environmental management and of following any environmental management system requirements f) Making sure the Environmental Management System fulfils its intended outcomes g) The direction and support of individuals resulting in an effectively managed Environmental Management System h) The promotion of continual improvement i) The support of other individuals on the management team to facilitate leadership in accordance with their roles.

	STATEMENT/PROCEDURE
1.	The Environmental Policy includes a commitment from management to demonstrate leadership and commitment with regard to the Environmental Management System in accordance with the requirements of the International Standard.

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5 - LEADERSHIP

5.2	Environmental Policy
Summary of Requirements	<p>An Environmental Policy is to be set up, put into practice and maintained by top management. The Policy shall, within the scope of its Environmental Management System:</p> <ul style="list-style-type: none"> a) Be appropriate to the Organisation's aims and activities, including the nature, scale and environmental impacts of its activities, products and services b) Offer a framework for establishing Environmental Objectives c) Comprise actions to safeguard the protection of the environment; these include preventing pollution and other specific aim(s) relevant to the Organisation's activities d) Comprise a commitment relating to its compliance obligations e) Comprise a commitment relating to the continual improvement of the Environmental Management System to facilitate an improvement in environmental performance. <p>The Environmental Policy shall:</p> <ul style="list-style-type: none"> a) Be maintained as documented information b) Be made known to individuals within the Organisation c) Be made available to interested parties.

	STATEMENT/PROCEDURE
1.	The Organisation's Environmental Policy is documented earlier in this Environmental Manual and fulfils the requirements summarised above.
2.	In order to provide evidence of the Organisation's commitment to the Environmental Policy, it is regularly reviewed and any changes are approved as part of the formal Management Review proceedings. These reviews and all approved changes are recorded in the minutes of the Management Reviews.
3.	Copies of the Environmental Policy are made available to all members of staff. Copies of the minutes of Management Reviews, or extracts thereof, are provided to individual members of staff in accordance with their role and responsibilities as a means of communicating the effectiveness of the Environmental Management System.
4.	Copies of the Environmental Policy are made available to relevant interested parties, where considered appropriate to do so.

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5 - LEADERSHIP

5.3	Organisational roles, responsibilities and authorities
Summary of Requirements	<p>Appointment and communication of responsibilities and authorities for company roles within the Organisation are ensured by top management.</p> <p>Responsibility and authority for the following shall be allocated by top management:</p> <ul style="list-style-type: none">a) Ensuring that the Environmental Management System meets the requirements of the International Standardb) Relating any information regarding the performance of the Environmental Management System to top management, including environmental performance.

	STATEMENT/PROCEDURE
1.	Responsibilities and authorities, together with the job title of those responsible for communicating them throughout the Organisation, are illustrated on the Environmental Structure Chart in this Manual.
2.	The Managing Director ensures that, at all times, a nominated member of staff, referred to in this Manual as the Environmental Manager, has responsibility for promoting customer awareness and implementing and ultimately overseeing all aspects of the Environmental Management System, as summarised above.

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6 - PLANNING

6	Planning
6.1	Actions to address risks and opportunities
6.1.1	General
Summary of Requirements	<p>The Organisation shall set up, put into practice and maintain any necessary procedures to meet the requirements in 6.1.1 to 6.1.4.</p> <p>The Organisation shall consider the following when setting up the Environmental Management System:</p> <ul style="list-style-type: none"> a) The points covered in 4.1 b) The requirements stated in 4.2 c) The scope of the Organisation’s Environmental Management System <p>and determine the risks and opportunities relating to the following:</p> <ul style="list-style-type: none"> a) Environmental aspects (see 6.1.2) b) Compliance obligations (see 6.1.3) c) Other issues and requirements, as detailed in 4.1 and 4.2 <p>that need to be undertaken so that:</p> <ul style="list-style-type: none"> a) Assurance may be given that the Environmental Management System can achieve its intended outcomes b) Undesired effects, including the possibility of external environmental conditions affecting the Organisation, may be prevented or reduced c) Continual improvement may be achieved. <p>The Organisation shall determine potential emergency situations, including those that can have an environmental impact, within the scope of the Environmental Management System. Documented information of the following shall be maintained by the Organisation:</p> <ul style="list-style-type: none"> d) Risks and opportunities that require attention e) Required processes in 6.1.1 to 6.1.4, to the extent necessary to be sure that they are carried out as planned.

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6 - PLANNING

6	Planning (continued)
STATEMENT/PROCEDURE	
1.	Environmental Management System planning forms part of the Management Review process described in Section 9.3.
2.	The Organisation holds regular management and operational review meetings to set and monitor the environmental related Objectives, ensuring that risks and opportunities are included as part of this process to the extent considered necessary. The management team reviews the Environmental System in order to ensure that it addresses all relevant processes and verification requirements.
3.	Processes that are necessary to facilitate the service provided are determined, planned and implemented in accordance with the relevant procedures described in Section 8.1 of this Manual. The effectiveness of the documented procedures is subject to regular Management Review and any revisions or improvements are made as necessary.
4.	The risks and opportunities that can affect conformity to the International Standard are determined and addressed by inclusion in all relevant decision-making processes to the extent considered necessary.
5.	Wherever risks and opportunities are identified, and where considered appropriate by management, suitable treatment is documented on a document relating to the process or record affected by the risk, with an appropriate record compiled, maintained and implemented.

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6 - PLANNING

6.1	Actions to address risks and opportunities (continued)
6.1.2	Environmental Aspects
Summary of Requirements	<p>The Organisation shall determine, within the defined scope of the Environmental Management System, the Environmental Aspects of its activities, products and services that it can have control over and those that can be influenced by the Organisation, and their related Environmental Impacts, considering a life cycle perspective.</p> <p>The Organisation shall take into account the following when determining Environmental Aspects:</p> <ul style="list-style-type: none"> a) Possible future change, including planned or new developments, and new or revised activities, products and services b) Emergency situations deemed reasonably predictable and unusual circumstances. <p>Those aspects that have or can have a significant Environmental Impact, i.e. significant Environmental Aspects, shall be determined by the Organisation by using criteria in place.</p> <p>Among the various levels and functions of the Organisation, significant Environmental Aspects shall be communicated, as appropriate.</p> <p>Documented information of the following shall be kept by the Organisation:</p> <ul style="list-style-type: none"> a) Environmental Aspects and related Environmental Impacts b) Criteria used to determine the Organisation's significant Environmental Aspects c) Significant Environmental Aspects.

	STATEMENT/PROCEDURE
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 has been assessed.

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6 - PLANNING

6.1.2	Environmental Aspects (continued)
3.	<p>Items included in this and subsequent Environmental Reviews include, but are not limited to:</p> <ol style="list-style-type: none">1. Legal requirements2. Discharges to air, land and water3. Potential CoSHH and Health & Safety aspects of the materials used4. Waste management5. Working practices6. Use of resources7. Suppliers' and sub-contractors' environmental profiles8. Office, administration and waste recycling9. Transport issues10. Production waste, including materials, chemicals and water11. Secure shredding/disposal of waste12. Packaging disposal issues13. Chemical usage and waste chemical disposal14. General recycling activities15. Work process requirements16. Environmental utilities performance.
4.	<p>As part of the Management Review process, defined in Section 9.3, the continuing significance of these Environmental Aspects is confirmed and taken into account whilst maintaining the Environmental Management System.</p>
5.	<p>As part of Management Review, the Organisation's Environmental Aspects are reviewed in order to ensure that the information is kept up to date.</p>

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6.1	Actions to address risks and opportunities (continued)
6.1.3	Compliance obligations
Summary of Requirements	<p>The Organisation shall:</p> <ul style="list-style-type: none"> a) Determine and be able to access the compliance obligations related to its Environmental Aspects b) Determine how these compliance obligations may be applied to the Organisation c) Take these compliance obligations into account when setting up, putting into practice, maintaining and continually improving its Environmental Management System. <p>Documented information of the Organisation's compliance obligations shall be maintained by the Organisation.</p>

STATEMENT/PROCEDURE	
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 is a member of IPIA (Independent Print Industries Association) that issues a regular newsletter or similar publication 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.
5.	The Organisation regularly reviews relevant environmental regulations, as listed at https://www.gov.uk/topic/environmental-management .

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6.1	Actions to address risks and opportunities (continued)
6.1.4	Planning action
Summary of Requirements	<p>The Organisation intends to plan the following:</p> <p>a) To undertake to address its:</p> <ul style="list-style-type: none"> a. Significant Environmental Aspects b. Compliance obligations c. Risks and opportunities identified in 6.1.1 <p>b) How to:</p> <ul style="list-style-type: none"> a. Integrate the actions into its Environmental Management System processes (see 6.2, Clause 7, Clause 8 and 9.1), or other business processes and put these into practice b. Assess the effectiveness of these actions (see 9.1). <p>The Organisation shall consider its technological alternatives and its financial, operational and business needs when planning these actions.</p>

	STATEMENT/PROCEDURE
1.	The Environmental Manager, in liaison with top management, is responsible for ensuring that the Organisation takes appropriate actions to address its significant Environmental Aspects, compliance obligations and risks and opportunities.
2.	The required actions are fully integrated into the Environmental Management System, and into other relevant business processes throughout the Organisation.
3.	Section 9 (Performance Evaluation) ensures that the effectiveness of the actions is evaluated and documented.
4.	Wherever risks and opportunities are identified, and where considered appropriate by management, suitable treatment is recorded on the document relating to the process or record affected by the risk, with an appropriate record compiled and maintained.

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6.2	Environmental Objectives and planning to achieve them
6.2.1	Environmental Objectives
Summary of Requirements	<p>Environmental Objectives at relevant functions and levels are to be agreed on by the Organisation, bearing in mind its significant Environmental Aspects and related compliance obligations, and considering its risks and opportunities.</p> <p>The Environmental Objectives shall be:</p> <ul style="list-style-type: none"> a) In keeping with the Environmental Policy b) Quantifiable c) Monitored d) Communicated e) Updated as appropriate. <p>Documented information on the Environmental Objectives shall be maintained.</p>
6.2.2	Planning actions to achieve Environmental Objectives
Summary of Requirements	<p>The Organisation shall determine the following when preparing to meet its Environmental Objectives:</p> <ul style="list-style-type: none"> a) What will be carried out b) What resources will be needed c) The individual appointed to carry out the task d) When the task will be finalised e) How the results will be assessed.

	STATEMENT/PROCEDURE
1.	As part of the Management Review process described in Section 9.3, Objectives and Targets are set in accordance with the Environmental Aspects identified in Section 6.1.2.

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6.2	Environmental Objectives and planning to achieve them (continued)
2.	An Environmental Programme is maintained by the Organisation identifying those activities selected from the list of significant Environmental 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, 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: <ol style="list-style-type: none">1. The Organisation's compliance obligations2. The Organisation's significant Environmental Aspects3. The Organisation's technological options4. The Organisation's financial options5. The Organisation's operational options6. The Organisation's business requirements7. The views of external interested parties8. 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: <ol style="list-style-type: none">1. Objectives2. Targets3. Target Programme including timescales4. Means of achieving Objectives and Targets5. Methods for measuring achievement of Objectives and Targets6. Member of staff responsible for monitoring and overseeing implementation.

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6.2	Environmental Objectives and planning to achieve them (continued)
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 including its commitment to: <ol style="list-style-type: none">1. Prevent pollution2. Control resource usage3. Support environmental protection4. Achieve continual improvement.

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7.1	Resources
Summary of Requirements	The resources necessary for establishing, implementing, maintaining and continually improving the Environmental Management System shall be determined and provided by the Organisation.

	STATEMENT/PROCEDURE
1.	Top management ensures that, at all times, a nominated member of staff (the Environmental Manager) 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 processes 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 9.3.
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.

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7.2	Competence
Summary of Requirements	<p>The following shall be undertaken by the Organisation:</p> <ul style="list-style-type: none"> a) The necessary competence of person(s) doing work under its control that affects its environmental performance and its capacity to meet its compliance obligations shall be determined b) The Organisation shall ensure that these persons are competent with regard to appropriate education, training, or experience c) Training requirements related to the Organisation's Environmental Aspects and its Environmental Management System shall be determined d) Actions shall be taken, where applicable, to ensure that staff are suitably competent, and the effectiveness of the actions taken shall be assessed by the Organisation. <p>Appropriate documented information shall be retained by the Organisation as evidence of competence.</p>
7.3	Awareness
Summary of Requirements	<p>It shall be ensured by the Organisation that persons doing work under its control are aware of the following:</p> <ul style="list-style-type: none"> a) The Environmental Policy b) The significant Environmental Aspects and associated actual or potential Environmental Impacts related to their activities c) Their role relating to the effective operation of the Environmental Management System; this includes the advantages of improved environmental performance d) The consequences of not fulfilling Environmental Management System requirements, including not meeting the Organisation's compliance obligations.

	STATEMENT/PROCEDURE
1.	Environmental training needs are identified as a result of formal Management Review and appraisal, as detailed in Section 9.3, 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.

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7.2 7.3	Competence (continued) Awareness (continued)
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: <ol style="list-style-type: none">1. Induction training2. Informal work training3. Formal training4. Customer Instructions5. Supplier training6. 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: <ol style="list-style-type: none">1. The importance of conformance with the Environmental Policy2. The importance of conformance with environmental procedures3. The significant Environmental Aspects related to the individual's work activities4. Roles and responsibilities in achieving conformance with the Environmental Policy and the environmental procedures5. 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 7.2 (Competence), Section 7.3 (Awareness) and Section 7.5.3 (Control of Documented Information) in the Organisation's ISO 9001 Quality Manual.

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7.4	Communication
7.4.1	General
Summary of Requirements	<p>Internal and external communications relating to the Environmental Management System shall be determined by the Organisation, including the following:</p> <ul style="list-style-type: none"> a) The subject of the communications b) When to communicate c) With whom to communicate d) Manner of communications. <p>The Organisation shall do the following when setting out its communication process(es):</p> <ul style="list-style-type: none"> a) Bear in mind its compliance obligations b) Ensure that environmental information communicated reflects information generated within the Environmental Management System, and is dependable. <p>All relevant communications on the Organisation’s Environmental Management System shall be acted on by the Organisation. Documented information shall be retained by the Organisation to serve as proof of communications, as appropriate.</p>
7.4.2	Internal communication
Summary of Requirements	<p>The Organisation shall undertake the following:</p> <ul style="list-style-type: none"> a) Communicate information relating to the Environmental Management System internally among the various levels and functions of the Organisation, including any amendments to the Environmental Management System, as appropriate b) Ensure its communication process(es) provide conditions which help persons doing work under the Organisation’s control to play a role in continual improvement.
7.4.3	External communication
Summary of Requirements	<p>Information relating to the Environmental Management System, as set out by the Organisation’s communication process(es) and as stated in its compliance obligations shall be externally communicated by the Organisation.</p>

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7.4	Communication (continued)
STATEMENT/PROCEDURE	
1.	The Environmental Policy is displayed on the Organisation's premises in order to ensure that it is made available and brought to the attention of all members of staff.
2.	The effectiveness of the Environmental Management System is communicated throughout the Organisation by providing copies of the minutes of Management Reviews, or extracts thereof, to individual members of staff in accordance with their role and responsibilities.
3.	Appropriate methods for internal communication are used according to the nature and required distribution of the information.
4.	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.
5.	External interested parties may include the following: <ol style="list-style-type: none">1. Suppliers and sub-contractors2. Customers3. Regulatory bodies4. Enforcement agencies5. The general public.
6.	The details of all external communications of an environmental nature are recorded on a Management Information Report held in the Management Information File.
7.	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.
8.	Emergency planning communications are undertaken and procedures agreed in accordance with the procedures set out in Section 8.2.

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7.4	Communication (continued)
9.	Records of all environmental communications received are one of the elements addressed during Management Review.

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7.5	Documented information
7.5.1	General
Summary of Requirements	<p>The following shall be included in the Organisation's Environmental Management System:</p> <p>a) Documented information as stated by the International Standard</p> <p>b) Documented information determined by the Organisation as being essential for the effective operation of the Environmental Management System.</p>

	STATEMENT/PROCEDURE
1.	<p>The Environmental Management System is defined in the following documents:</p> <ol style="list-style-type: none"> 1. This Environmental Manual 2. Environmental System Organisational Chart 3. Environmental System Policy Statement 4. The Organisation's ISO 9001 Management System 5. Environmental and other Risk Assessments 6. Environmental Method Statements 7. CoSHH Assessments 8. Product and Chemical Data Sheets 9. Work Instructions and Procedure Manuals 10. The Organisation's library of environmental legislation and regulation and related publications 11. The Organisation's Health & Safety System 12. Industry Regulations 13. Environmental system records.
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 defined objectives is achieved by application of all relevant procedures set out in this Manual relating to monitoring and evaluating compliance with the Organisation's environmental performance and by analysing non-conformance issues.

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7.5	Documented information (continued)
7.5.2	Creating and updating
Summary of Requirements	<p>The Organisation shall ensure the following when compiling and updating documented information:</p> <ul style="list-style-type: none"> a) Appropriate identification and description (e.g. a title, date, author, or reference number) b) Appropriate format (e.g. language, software version, graphics) and media (e.g. paper, electronic) c) Appropriate review and approval for suitability and adequacy.

	STATEMENT/PROCEDURE
1.	<p>All created and updated documented information includes the following:</p> <ul style="list-style-type: none"> 1. Title 2. Date 3. Author 4. Template reference 5. Reference number 6. Version number.
2.	<p>New document templates are approved by the Managing Director and recorded on the Document Template Control Schedule to ensure that up-to-date templates are used consistently throughout the Organisation.</p>
3.	<p>Where necessary, documents are approved at an appropriate level before release from the Organisation.</p>

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7.5	Documented information (continued)
7.5.3	Control of documented information
Summary of Requirements	<p>The Organisation shall ensure the following by controlling documented information necessary to the Environmental Management System and required by the International Standard:</p> <ul style="list-style-type: none"> a) Availability of such information and suitability for use, where and when it is needed b) Adequate protection of such information (e.g. from loss of confidentiality, improper use, or loss of integrity). <p>The Organisation shall address the following activities, as applicable, in order to control documented information:</p> <ul style="list-style-type: none"> a) Distribution, access, retrieval and use b) Storage and preservation, including preservation of legibility c) Control of changes (e.g. version control) d) Retention and disposition. <p>The Organisation shall identify, as appropriate, and control documented information of external origin determined by the Organisation as necessary for the planning and operation of the Environmental Management System.</p>

STATEMENT/PROCEDURE	
	ENVIRONMENTAL MANUAL
1.	(The Managing Director has approved this Environmental Manual and the associated documents referred to in Section 7.5.1 and will approve all subsequent issues.
2.	The only controlled copy of the Environmental Manual is that held on the Organisation's computer system and is maintained by the Environmental Manager.
3.	All hard and any other electronic copies are by definition uncontrolled.
4.	Proposed changes to the Environmental Manual are identified during the day-to-day activities as well as more formally during the Management Review process described in Section 9.3.

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7.5	Documented information (continued)
5.	Proposed changes are reviewed and, if appropriate, adopted by the Quality 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 the appropriate personnel are notified of the change.
	OTHER CONTROLLED ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTS
7.	Copies of Organisation documents are maintained as described in this Manual and superseded copies are marked as superseded or marked as such to prevent inadvertent use.
8.	The Organisation has developed a document and filing system to ensure a consistent approach to the management of documents. All documents are held as part of the management system and are identified and controlled with the document reference to which they relate.
9.	Documents, product specifications, batch information and related documents received from customers or their representatives are reviewed on their receipt. Documents are held in the record system and, if used for later orders, are verified with the customer for status identification and approval.
10.	Documents prepared by the Organisation are marked with the order reference to which they relate.
11.	Internal documents and forms are held as a master version on the system where generated in this way. As a document is updated the master version held on the system is updated to reflect the change. A Master Document Register is maintained.
12.	The internet is used for additional reference to regulatory and legislative requirements. Whenever this reference is made verification of copies of documents held by the Organisation is made, and superseded copies identified are controlled as described above.
	GENERAL CONTROLS
13.	The Organisation's computer system is regularly backed up with a copy securely stored.

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7.5	Documented information (continued)
14.	The integrity of the computer system and the data held on it is maintained by running background virus protection software and the maintenance of effective and regularly updated firewalls.
13.	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.
	RECORDS
14.	<p>The EMS Manager is responsible for keeping the following records and similar documents for a minimum period of 12 months or as required by legal, regulatory and/or contractual requirements, whichever is the longer, in order to demonstrate conformity to the requirements and effective operation of the Environmental Management System:</p> <ol style="list-style-type: none"> 1. Management Review records 2. Communications of an environmental nature from, and responses to, external interested parties 3. Monitoring and measurement records 4. Non-conformance records 5. Corrective and preventive action records 6. Environmental Audit records 7. Environmental Risk Assessments 8. Calibration Register 9. Calibration Certificates 10. Order Management System 11. Waste Transfer Notes 12. Customer correspondence.
15.	<p>The Environmental Manager is responsible for:</p> <ol style="list-style-type: none"> 1. Identifying and specifying the records that are subject to control 2. Nominating individuals responsible and accountable for every record 3. Specifying the contents of records (through procedures) 4. Record disposal.

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7.5	Documented information (continued)
16.	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.
17.	The Environmental Manager maintains a Record Control Schedule with document specific requirements, as appropriate, for the identification, collating, indexing, filing, storage and maintenance of records.
18.	Environmental records are reviewed annually by the Environmental Manager and those retained in excess of the specified retention period are disposed of or are appropriately marked to show their superseded status.

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8 - OPERATION

8.1	Operational planning and control
Summary of Requirements	<p>The necessary processes to meet Environmental Management System requirements and to implement the actions identified in <u>6.1</u> and <u>6.2</u> shall be set up, put into practice, controlled and maintained by the Organisation, by:</p> <ul style="list-style-type: none">a) Setting up operating criteria for the process(es)b) Putting into practice control of the process(es), in accordance with the operating criteria. <p>Planned changes shall be controlled and the effects of unintentional changes shall be reviewed by the Organisation, taking action to mitigate any adverse effects, as necessary. Control or influence of (an) outsourced process(es) shall be ensured by the Organisation. The environmental management system shall define the type and extent of control or influence to be applied to the process(es).</p> <p>The Organisation shall do the following, consistent with a life cycle perspective:</p> <ul style="list-style-type: none">a) Set up appropriate controls to ensure that its environmental requirement(s) is (are) dealt with in the design and development process for the product or service, considering each stage of its life cycleb) Determine, as appropriate, the Organisation's environmental requirement(s) for the procurement of products and servicesc) Communicate to external providers, including contractors, its related environmental requirement(s)d) Consider the requirement to make available information about possible significant environmental impacts related to the transportation or delivery, use, end-of-life treatment and final disposal of its products and services. <p>Documented information shall be maintained by the Organisation to the extent necessary in order to ensure that the process(es) has (have) been executed as planned.</p>

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8 - OPERATION

8.1	Operational planning and control (continued)
	STATEMENT/PROCEDURE
1.	<p>Operational control is maintained by the use of procedures set out in:</p> <ol style="list-style-type: none">1. This Environmental Manual2. The Organisation's ISO 9001 Quality Management System3. Environmental Method Statements4. The schedule of compliance obligations5. Training Programmes6. CoSHH Assessments and Method Statements7. The Organisation's operational procedures documents8. The Organisation's Health & Safety Management System.
2.	<p>As part of initial induction and ongoing training, staff are made aware that they are responsible for reporting environmental observations and suggestions to the Environmental Manager.</p>
3.	<p>The Organisation has prepared documented procedures for key areas of its operations, products and activities, providing detailed instructions in order to ensure compliance with the Environmental Management System. A copy of these documents is issued to relevant staff and all other interested parties.</p>
4.	<p>The Organisation ensures that, where appropriate, its environmental requirements are addressed in the design and development process for its products or services, considering each stage of its life cycle.</p>
5.	<p>The Organisation has determined and documented its environmental requirement(s) for the procurement of products and services, as appropriate.</p>
6.	<p>The Organisation considers at every appropriate level the need to provide information about potential significant Environmental Impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.</p>

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8 - OPERATION

8.1	Operational planning and control (continued)
7.	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 matters relevant to the achievement of its Environmental Objectives.
8.	Suppliers 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 8.4 (Control of externally provided products and services) of the Organisation's ISO 9001 Quality Manual.
9.	Production staff and managers plan the distribution of resources and operatives oversee equipment work requirements and are responsible for the management of related work processes.
10.	Planning also takes place at daily operations meetings. Planning issues identified at the meetings are documented and distributed.
11.	Office staff are responsible for planning the work within the office environment which is carried out in accordance with production operations. Forward planning and anticipated deadlines are highlighted in advance.

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8 - OPERATION

8.2	Emergency preparedness and response
Summary of Requirements	<p>The necessary processes in order to prepare for and respond to potential emergency situations identified in 6.1.1 are to be set up, put into practice and maintained.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none"> a) Actions shall be planned as a means of preparing to respond, for prevention or mitigation of adverse Environmental Impacts from emergency situations b) Actual emergency situations shall be responded to c) Measures shall be put in place for prevention or mitigation of the outcomes of emergency situations which shall be in keeping with the scale of the emergency and the potential environmental impact d) Planned response actions shall be tested periodically, where practicable e) The process(es) and planned response actions shall be reviewed and revised at intervals, especially after emergency situations or tests have occurred f) Relevant interested parties, including persons working under its control, shall be supplied with appropriate related emergency preparedness and response-related information and training g) Documented information shall be maintained by the Organisation to the necessary degree to ensure confidence that process(es) are executed according to plan.

	STATEMENT/PROCEDURE
1.	The potential for and response to accidents and emergency situations are identified during the preparation of the Environmental Programme undertaken as a component of the Environmental Management System.
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.

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8 - OPERATION

8.2	Emergency preparedness and response (continued)
4.	As far as 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.	The Organisation provides relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control.
6.	A Health & Safety File is maintained with master copies of all related documents. The file is made freely available to staff and copies of individual procedures are placed at appropriate locations.
7.	Existing procedures are reviewed and revised following any unexpected incident having a significant Environmental Impact.

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation
9.1.1	General
Summary of Requirements	<p>Monitoring, measurement, analysis and evaluation of the Organisation's environmental performance shall be carried out by the Organisation and the following shall be determined:</p> <ol style="list-style-type: none"> a) What requires monitoring and measuring b) In order to ensure results which are valid, monitoring, measurement, analysis and evaluation methods, as applicable c) The criteria for assessment of environmental performance, and appropriate indicators d) Scheduling of monitoring and measuring e) Scheduling of analysis and evaluation of results from monitoring and measurement. <p>The usage and maintenance of calibrated or verified monitoring and measurement equipment, as appropriate, shall be ensured by the Organisation.</p> <p>The environmental performance and effectiveness of the Environmental Management System shall be assessed by the Organisation.</p> <p>Information relating to the Organisation's environmental performance shall be communicated by the Organisation internally and externally, as described in its communication process(es) and in keeping with its compliance obligations.</p> <p>Appropriate documented information shall be retained by the Organisation resulting from the monitoring, measurement, analysis and evaluation data.</p>

STATEMENT/PROCEDURE	
1.	<p>The Organisation monitors, measures, analyses and improves its processes in order to:</p> <ol style="list-style-type: none"> 1. Demonstrate conformity of its activities 2. Ensure conformity to the Environmental Management System 3. Continually improve the effectiveness of the Environmental Management System.

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation (continued)
2.	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.
3.	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.
4.	A Management Information Report is raised to record the results of the environmental performance monitoring and is passed for Management Review.
5.	Management Review activities include a review of compliance with the relevant Environmental Risk Assessment Monitoring Records.
6.	Whenever equipment is used for monitoring or measuring, it is controlled by the application of the procedures set out in Section 7.1.5 (Monitoring and measuring resources) of the Organisation's ISO 9001 Quality Manual.
7.	Whenever fine tolerance measurements are required, any equipment used is calibrated and maintained in accordance with the manufacturers' guidelines and records are kept of the results.

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation (continued)
9.1.2	Evaluation of compliance
Summary of Requirements	<p>The necessary processes to assess the realisation of the Organisation's compliance obligations shall be set up, put into practice and maintained by the Organisation.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none">a) The frequency of the future evaluation of compliance shall be determinedb) Compliance shall be evaluated and any necessary action shall be takenc) Knowledge and understanding of the Organisation's compliance status shall be maintained. <p>Documented information shall be kept by the Organisation as evidence of data resulting from the compliance evaluation.</p>

	STATEMENT/PROCEDURE
1.	The Environmental Manager ensures that a review of the Organisation's obligations is carried out at twice a year intervals and that appropriate records are maintained. These are normally a short time prior to Management Reviews to ensure that findings can be reviewed and addressed.
2.	Management Review activities include a review of all significant findings identified during such compliance reviews and determination of any appropriate actions which need to be taken.

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9 - PERFORMANCE EVALUATION

9.2	Internal audit
9.2.1	General
Summary of Requirements	<p>Internal audits shall be carried out periodically to communicate whether the Environmental Management System:</p> <ul style="list-style-type: none">a) Is consistent with:<ul style="list-style-type: none">a. The Organisation's own obligations for its Environmental Management Systemb. The requirements detailed by the International Standard.b) Is put into practice and maintained successfully.
9.2.2	Internal audit programme
Summary of Requirements	<p>An internal Audit Programme(s), including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits shall be put into practice and maintained.</p> <p>The Organisation shall consider the environmental significance of the processes involved, changes affecting the Organisation and the results of previous audits when setting up the internal audit programme.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none">a) The audit criteria and scope shall be defined for each auditb) Auditors shall be assigned and audits conducted to ensure objectivity and that the audit process remains impartialc) It should be ensured that relevant management are made aware of the results of the audits. <p>Documented information serving as evidence of the implementation of the Audit Programme and audit results shall be kept by the Organisation.</p>

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9.2	Internal audit (continued)
	STATEMENT/PROCEDURE
1.	There are up-to-date procedures and a programme to check (audit) that the Environmental Management System: 1. Reflects the Organisation's requirements for environmental management 2. Reflects the requirements of the International Standard 3. Is being properly operated and maintained up to date.
2.	The results of all Environmental Audits are passed to management.
3.	The Environmental Audit Programme reflects the: 1. Environmental importance of the activity concerned 2. Results of previous Environmental Audits.
4.	Environmental Audit procedures address: 1. The audit scope 2. Audit frequency 3. Audit methodologies 4. Responsibilities and requirements for conducting audits and reporting results.
5.	An Environmental Audit Programme is maintained by the Environmental Manager ensuring that every Section of the Environmental Management System is verified at least annually.
6.	More frequent Environmental Audits may be organised by the Environmental Manager depending on the importance of the activities being audited.
7.	Internal Environmental Audits are carried out according to the following procedures:
8.	Twice a year (before management meeting) 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 internal audit.

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9 - PERFORMANCE EVALUATION

9.2	Internal audit (continued)
9.	A member of staff, whenever possible independent of the activity to be audited, is appointed by the Environmental Manager.
10.	The Auditor refers to this Manual and determines the activities to be audited.
11.	The Auditor selects a representative number of records to be audited on a random basis.
12.	The Auditor advises any personnel concerned that an Environmental Audit is being undertaken and answers any questions they may have regarding the audit.
13.	The Auditor examines the records selected in order to determine whether the activities identified above have been carried out correctly.
14.	Objectives, Targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy.
15.	The Environmental Audit Record and all other documents relating to internal audits are passed to the Environmental Manager.
16.	The Environmental Audit Record and all other documents relating to internal Environmental Audits are retained for inspection by QMS International at the annual external Environmental Audit.
17.	All issues arising from the internal Environmental Audit requiring immediate attention are discussed with the appropriate personnel and a record is kept on an Environmental Audit Report or Management Information Report as appropriate.
18.	The Environmental Manager ensures that the Environmental Audit results are discussed at the next Management Review.

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9 - PERFORMANCE EVALUATION

9.3	Management Review
Summary of Requirements	The Organisation's Environmental Management System shall be reviewed by top management at planned intervals to ensure its ongoing suitability, adequacy and effectiveness.

	STATEMENT/PROCEDURE
1.	An Environmental Management Review is carried out twice a year. If appropriate, a corrective action plan is formulated.
2.	Environmental Management Review meetings may be held as a component of other Management System Reviews.
3.	<p>Specific items included on the agenda of every Management Review are:</p> <ol style="list-style-type: none"> 1. The status of actions from previous Management Reviews 2. Changes in external and internal issues that are relevant to the Environmental Management System 3. Changes in the needs and expectations of interested parties, including compliance obligations 4. Changes in the Organisation's significant Environmental Aspects 5. Changes in risk and opportunities 6. The extent to which Environmental Objectives have been achieved 7. Information on the Organisation's environmental performance, including trends in: <ol style="list-style-type: none"> a) Non-conformities and corrective actions b) Monitoring and measurement results c) Fulfilment of compliance obligations d) Audit results. 8. Adequacy of resources 9. Relevant communications from interested parties, including complaints 10. Opportunities for continual improvement and related decisions

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9 - PERFORMANCE EVALUATION

9.3	Management Review (continued)
3./ continued	<p>11. Conclusions on the continuing suitability, adequacy and effectiveness of the Environmental Management System</p> <p>12. Decisions related to any need for changes to the Environmental Management System, including resources</p> <p>13. Actions, if needed, when Environmental Objectives have not been achieved</p> <p>14. Opportunities to improve integration of the Environmental Management System with other business processes, if needed</p> <p>15. Any implications for the strategic direction of the Organisation.</p>
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.	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.

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10 - IMPROVEMENT

10.1	General
Summary of Requirements	Opportunities for improvement shall be determined by the Organisation (see 9.1, 9.2 and 9.3) and any required actions to realise the intended outcomes of its Environmental Management System shall be put into practice.

	STATEMENT/PROCEDURE
1.	<p>The effectiveness of the Environmental Management System is continually reviewed and improved through the Management Review process set out in Section 9.3 and by:</p> <ol style="list-style-type: none">1. The application of the Environmental Policy2. The application of the Environmental Objectives3. Environmental Audits4. Analysis of data5. Corrective actions6. The evaluation and treatment of risks and opportunities7. Circulation of Management Review Minutes.

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10 - IMPROVEMENT

10.2	Non-conformity and corrective action
Summary of Requirements	<p>The Organisation shall do the following in the event of a non-conformity, including any arising from complaints:</p> <ul style="list-style-type: none"> a) Respond to the non-conformity and, as applicable: <ul style="list-style-type: none"> a. Control and correct it by taking necessary action b. Handle the outcomes, including lessening adverse Environmental Impacts. b) Consider necessary action to eradicate the origins of the non-conformity, to ensure it does not recur or occur elsewhere, through: <ul style="list-style-type: none"> a. Review of the non-conformity b. Ascertaining the origins of the non-conformity c. Determining if there are already similar non-conformities in existence, or whether these could potentially come about. c) Put any necessary actions into practice d) The effectiveness of any corrective action taken shall be reviewed e) Changes to the Environmental Management System shall be made, if necessary. <p>Corrective actions shall be appropriate to the effects of any non-conformities discovered, including the Environmental Impact(s).</p> <p>Documented information shall be retained by the Organisation as evidence of:</p> <ul style="list-style-type: none"> a) The nature of the non-conformities and any actions taken to correct these b) The consequences of any corrective action.

	STATEMENT/PROCEDURE
1.	The nature of, and action taken to correct, any non-conformances are recorded on the Non-conformance Report.
2.	An investigation is undertaken to determine the cause of the non-conformance.
3.	The corrective actions taken to prevent recurrence of non-conformances, and those records and reports generated, are regularly reviewed at Management Reviews in order to identify any trends and to determine the effectiveness of preventive measures taken.

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10 - IMPROVEMENT

10.2	Non-conformity and corrective action (continued)
4.	Revised procedures are developed and implemented as considered appropriate and are reviewed accordingly.

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ENVIRONMENTAL MANUAL

10 - IMPROVEMENT

10.3	Continual improvement
Summary of Requirements	Improvement of the suitability, adequacy and effectiveness of the Organisation's Environmental Management System is to be continual. The results of analysis and evaluation, and the outputs resulting from Management Review shall be considered by the Organisation in order to determine whether there are any existing needs or opportunities that continual improvement may attend to.

	STATEMENT/PROCEDURE
1.	The Organisation ensures continual improvement of the suitability, adequacy and effectiveness of the Environmental Management System by application of the procedures documented in Sections 10.1 and 10.2.