

M^cARDLE SPORT TEC LTD

ENVIRONMENTAL MANUAL



McArdle Sport Tec Ltd

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Endorsed for and on behalf of McArdle Sport Tec Ltd

A handwritten signature in black ink, appearing to read 'J. McArdle'.

Jim McArdle
Chairman
January 2021

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Revision and Amendment Register

DATE	PAGE NUMBER	PROCEDURE NUMBER	REVISION DETAILS	ISSUE NUMBER
September 2011	9	Policy	Remove 'design' Change approval to MF	5
	Various		Change reference from environmental risk assessments to environmental impact assessments	5
	13	4.3.2	Update regulations	5
September 2013	9		Remove Environmental Policy Statement	6
	13		Remove Regulations – refer to Legal Register	6
			Remove references to Site Waste Management Plans	
February 2017			New McArdle Logo General Review	
January 2020			General Review Include position of Operations Director	8
January 2021			General Review Remove position of Operations Director	

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1.0 SCOPE

ISO 14001 specifies 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 state specific environmental performance criteria.

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

1. Implement, maintain and improve an Environmental Management System
2. Assure itself of its conformance with its stated Environmental Policy
3. Demonstrate such conformance to others.
4. Seek certification/registration of its Environmental Management System by an external organisation, or
5. Make a self-determination and declaration of conformance with the International standard.

All 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.

2.0 NORMATIVE REFERENCES

There are no normative references at present.

3.0 TERMS AND DEFINITIONS

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 organisation (3.16) are fulfilled.

Auditor

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

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.

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Note — the process need not take place in all areas of activity simultaneously.

Non Conformity

Non-fulfilment of a requirement.

Corrective Action

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

Document

Information and its supporting medium.

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.

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.

Environmental Impact

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

Environmental Management System

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

Environmental Objective

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

Environmental Performance

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

Note – in the context of environmental management systems, results can be measured against the organisation's environmental policy, environmental objectives, environmental targets and other environmental performance targets.

Environmental Policy

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

Note – The environmental policy provides a framework for action and for the setting of environmental objectives and environmental targets.

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Environmental Target

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

Interested Party

Any person or organisation concerned with or affected by the environmental performance of an organisation.

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.

Preventative Action

Action to eliminate the cause of a potential non-conformity.

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.

Note – prevention of pollution can include source reduction or elimination, process, product or service changes.

Procedure

Specified way to carry out an activity or process.

Note – procedures can be documented or not.

Record

Document stating results achieved or providing evidence of activities performed.

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4.0 ENVIRONMENTAL MANAGEMENT SYSTEM REQUIREMENTS

4.1 GENERAL REQUIREMENTS

The Standard requires that McArdle Sport Tec Ltd must establish, maintain and continually improve an Environmental Management System, reflecting the requirements of BS EN ISO 14001: 2004. The organisation must define and document the scope of its environmental management system.

	PROCEDURE
1.	McArdle Sport Tec Ltd (the 'Organisation') has defined its Environmental Management System in this Environmental Manual.
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 Environmental Policy.
3.	The scope of the Organisation's environmental certification is set out in the Environmental Policy.
4.	The Organisation has ensured that, whenever possible, there is integration of its Quality Assurance, Health and Safety and Environmental Management Systems.

4.2 ENVIRONMENTAL POLICY

Top management must define an Environmental Policy and ensure that, within the defined scope of its environmental management system, it:

1. Directly relates to the environmental impacts of the Organisation's scope of activities, products and services
2. Takes into account the nature and magnitude of all such environmental impacts
3. Commits the Organisation to take all reasonable steps to prevent pollution
4. Commits the Organisation to continually seek improvements in its Environmental Management System
5. Commits the Organisation to compliance with all relevant legal requirements
6. Provides a framework for setting and reviewing environmental objectives and establishes time frames for their achievement
7. Is documented, put in to practice and sustained
8. Is introduced to all persons working for or on behalf of the organisation
9. Can be accessed by the public.

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4.3 PLANNING

4.3.1 ENVIRONMENTAL ASPECTS

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.

	PROCEDURE
1.	As part of the initiation of the Environmental Management System, an Environmental Review of the Organisation's activities was undertaken 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 to produce Environmental Impact Assessments.
3.	Items included in this and subsequent Environmental Reviews include, but are not limited to: • All relevant statutory and regulatory requirements • Industry standards and codes of practice • Discharges to air, land or water • Water and energy consumption • Potential COSHH and health and safety aspects of materials used • Working practices • Use of resources • Waste management • Head Office practices • Suppliers' and sub-contractors' environmental profiles • Materials and goods purchased • Transportation of materials • Organisation's own vehicles Emergency situations.
4.	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.

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5.	As part of the Management Review, the Organisation's Environmental Impact Assessments are reviewed in order to ensure that the information is up to date.
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4.3.2 LEGAL AND OTHER 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.

	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.	The following serve as the Organisation's principal sources: • Croners A-Z Guide to Environmental Practice • Relevant Water Authorities • Specialist waste disposal contractors • The Environment Agency • Local Authorities • Industry related bodies and/or websites • Specialist publications.
3.	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.
4.	Current relevant legislation and regulations are held on the Legal Register.

4.3.3 OBJECTIVES AND TARGET PROGRAMME(S)

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.

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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:

1. The Environmental Policy
2. Statutory, regulatory and other relevant requirements
3. The Organisation's significant environmental aspects including, as relevant:
 - Air emissions
 - Water discharges
 - Waste management
 - Land contamination
 - Sustainability of natural resources used
 - Local and community environmental issues
 - Technological options
 - Financial requirements
 - Operational requirements
 - Business requirements
 - The views of interested parties.

	PROCEDURE
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: • The Organisation's legal and other similar requirements • The Organisation's significant environmental aspects • The Organisation's technological options • The Organisation's financial requirements • The Organisation's operational requirements • The Organisation's business requirements • The views of external interested parties • Internal feedback

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5.	For every objective and target set, a programme for its achievement is defined.
6.	An Environmental Impact Assessment is prepared for all activities included in the current Environmental Programme defining the following: • Objectives • Targets • Target programme including timescales • Means of achieving objectives and targets • Methods for measuring achievement of objectives and targets • Member of staff responsible for monitoring and overseeing implementation
7.	These Environmental Impact 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: • Prevent pollution • Control resource usage • Support environmental protection • Achieve continual improvement

4.4 IMPLEMENTATION AND OPERATION

4.4.1 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY

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:

- Implementing, maintaining and improving the Environmental Management System
- Reporting on the performance of the Environmental Management System
- Educating staff in their roles and responsibilities concerning:
 - The Environmental Policy and related procedures
 - The requirements of the Environmental Management System
 - Emergency preparedness and response requirements
 - The potential consequences of departure from specified operating procedures

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

- Adequately trained and skilled personnel
- Technology
- Financial resources

Structure Chart

This is a management structure relating to environmental matters and not necessarily to other management functions and responsibilities.



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	PROCEDURE
1.	The Chairman 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 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 4.6.

4.4.2 COMPETENCE, TRAINING AND AWARENESS

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:

1. The importance of conformance with the Environmental Policy and related procedures and with the requirements of the Environmental Management System.
2. The significant environmental impacts, actual or potential, associated with their roles in the Organisation.
3. The environmental benefits of improved environmental performance.
4. The potential consequences of departure from specified procedures.
5. All members of staff must be trained in:
 - Their roles and responsibilities with regard to the Environmental Policy and related procedures
 - The Requirements of the Environmental Management System
 - Emergency preparedness and response procedures
 - The potential consequences of departure from specified operating procedures
6. 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.

	PROCEDURE
1.	Environmental training needs are identified as a result of formal 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.	Environmental Impact Assessments are reviewed and environment specific training requirements are identified and similar programmes defined.

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3.	Training may take the form of: • New starter induction training • Environmental courses or seminars • Site induction training • Safety awareness (Work Box Talks) • Supplier training • Sub-contractor training • Health and safety courses • Fire awareness training.
4.	As a minimum, environment specific training includes, but is not limited to: • The importance of conformity with the Environmental Policy • The importance of conformance with environmental procedures • The significant environmental impacts related to the individual's work activities • Roles and responsibilities in achieving conformance with the Environmental Policy and the environmental procedures • Potential environmental consequences of departure from the environmental procedures.
5.	Records of all environmental training are kept in accordance with the procedures set out in the Organisation's Quality Manual.
6.	Any requirement for further training, including refresher courses, is diarised as a forward reminder.

4.4.3 COMMUNICATION

Up to date procedures must be in place to:

- Ensure efficient internal communication within the Organisation
- 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.

	PROCEDURE
1.	The Organisation has defined the procedures relating to internal communications and documented these in the Organisation's ISO 9001:2008 Quality Manual.
2.	In addition to the normal channels for internal communication all staff are made aware that any environmental concerns should be addressed to their line manager. Staff ideas for environmental improvements are invited.

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3.	All staff are made aware that any environmental concerns or ideas for improvement should be addressed to the Environmental Manager. These are discussed in the Management Review process.
4.	Notice of impending Management Review is given to all staff to promote ideas and feedback.
5.	The effectiveness of the Environmental Management System is communicated by providing all staff with feedback from the Management Review.
6.	Whenever communications relating to environmental issues 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.
7.	External interested parties may include the following: • Customers • Suppliers and sub-contractors • Enforcement agencies • Regulatory bodies • General public • Local residents.
8.	The details of all external communications of an environmental nature are recorded on an Environmental Communication Record held in the Environmental Records File.
9.	The response to the external communication may be verbal or in writing, depending 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 Environmental Communication Record.
10.	Emergency planning communications are undertaken and procedures agreed in accordance with the procedures set out in Section 4.4.7.
11.	Records of all environmental communications received are one of the elements addressed during Management Review.

4.4.4 DOCUMENTATION

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

1. The Environmental Policy, objectives and targets
2. The Organisation's scope of certification
3. A description of its core elements and their interaction
4. Direction to any related documents.

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	PROCEDURE
1.	The Environmental Management System is defined in the following documents: • This Environmental Manual • Environmental System Organisational Chart • Environmental System Policy Statement • The Organisation's ISO 9001:2008 system • Environmental and other risk assessments • Environmental method statements • Health and safety emergency plans • The Organisation's environmental Legal Register • The Health, Safety and Environmental Policy and Procedures • COSHH assessments • Product and Chemical data sheets
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.

4.4.5 CONTROL OF DOCUMENTS

Up to date procedures must be in place to control all Environmental Management System documents. These procedures must ensure that all current Environmental Management System documents:

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

Documents must be:

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

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- **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.**

	PROCEDURE
1.	The Chairman has approved this Environmental Manual and the associated documents referred to in Section 4.4.4 Environmental Management System and shall approve all subsequent issues.
2.	The only controlled copy of the Environmental Manual is that held on the computer system and is maintained by the QA 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 4.6. Proposed changes are reviewed and where appropriate, adopted by the QA Manager after taking into account all relevant information.
5.	When adopted, changes are made to the controlled copy of the Environmental Manual and the appropriate personnel are notified of the change.
6.	Any archived copies of the Environmental Manual and associated documents are clearly identified as such and physically or electronically segregated in order to prevent accidental use.
7.	All other documents listed in this section are subject to independent controls, as defined in the Quality Management System.
8.	The Organisation's computer system is backed-up with a copy securely stored.
9.	The integrity of the computer system and the data held on it is maintained by running background virus protection and firewall software.

4.4.6 OPERATIONAL CONTROL

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:

- **Keeping up to date documented procedures to cover situations where their absence could lead to deviations from the Environmental Policy, its objectives and targets**
- **Specific operating criteria**

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- Keeping up to date documented procedures related to the significant environmental aspects of purchased goods and services
- Informing suppliers and sub-contractors of all of the relevant procedures and requirements.

	PROCEDURE
1.	Operational control is maintained by the use of procedures contained in: • This Environmental Manual • The Organisation's ISO 9000 Quality Management System • Environmental and other Risk Assessments • The environmental Legal Register • Training programmes • COSHH Assessments and method statements • The Organisation's operational Procedures • The Organisation's Health and Safety System.
2.	Environmental requirements are covered in the site induction process and 'Work Box Talks'. All attendees, including sub-contractors sign an attendance sheet.
3.	As part of the induction of new starters and on-going training, staff are made aware that they are responsible for reporting environmental observations and suggestions to the Contracts Director and QA Manager. 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: • Prevention and/or mitigation of all forms of pollution • Recycling of materials • Waste management • Materials sourced from sustainable and/or renewable resources • Support for environmental protection.
4.	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 7.4 – Purchasing in the Organisation's ISO 9001:2008 Quality Manual.

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4.4.7 EMERGENCY PREPAREDNESS AND RESPONSE

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 must be in place to prevent or mitigate any adverse environmental impacts. Whenever practicable and in particular after the occurrence of an accident or emergency these procedures must be tested, reviewed and revised.

	PROCEDURE
1.	The response to potential accidents and emergency situations are identified during the preparation of the Environmental Programme undertaken as part of the Environmental Management System, that is set out in this Environmental Manual.
2.	Where the potential for accidents and emergency situations is identified, the Environmental Risk Assessment defines the Method Statement to prevent or mitigate the environmental impact of the occurrence.
3.	Generic emergency procedures are included in the Health and Safety Policy, a copy of which is issued to all supervisory and senior staff.
4.	Project specific emergency risks are included in the pre-tender Health and Safety information. Method Statements are developed and kept in the Site Safety File. All necessary training is provided during the site induction and revisited in regular 'Tool Box Talks'.
5.	Regular checks are carried out to ensure that all necessary emergency equipment is present on site. A record is kept on a Safety and Environmental Inspection report or a Weekly Site Safety Report as appropriate.
6.	As far as practicable accident and emergency response procedures are periodically tested in order to ensure that the required prevention or mitigation of environmental impact is achieved. A record of the testing is maintained.
7.	Fire response procedures are periodically tested at the Head Office.
8.	Existing procedures are reviewed and revised following any unexpected incident having a significant environmental impact.

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4.5 CHECKING

4.5.1 MONITORING AND MEASUREMENT

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.

	PROCEDURE
1.	Objectives and targets are established as a result of Environmental Impact 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 Impact 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 Impact Assessment document relating to the activity is marked with the name of the person responsible.
3.	Where monitoring activities identify significant deviation from the objectives and targets defined on the Environmental Impact Assessments, the Organisation's environmental non-conformance procedures are implemented in accordance with the procedures described in Section 4.5.2.
4.	Site based environmental performance is monitored by means of the following inspections: • Safety Advisor/Contracts Manager – Safety and Environmental Inspection Report • Site Manager – Weekly Site Safety Assessment Report
5.	Whenever equipment is used for monitoring or measuring of environmental performance, procedures are applied for the re-calibration of such equipment, in accordance with the manufacturer's guidelines.
6.	Calibration requirements are diarised in the forward reminder system and records of calibration are maintained in order to provide evidence of these activities.
7.	When such equipment is hired a check is made that the item is in calibration.
8.	Management Review activities include a review of compliance with the relevant Environmental Impact Assessment monitoring records.

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4.5.2 EVALUATION OF COMPLIANCE

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.

	PROCEDURE
1.	The QA 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 PREVENTATIVE ACTION

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

- Handling and investigating actual and potential non-conformance
- Taking action to mitigate any impacts caused
- Initiating and completing corrective and preventative action

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

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

	PROCEDURE
1.	Non-conformances relating to the Environmental Management system are brought to the attention of the Contracts Director.
2.	Such non-conformances are investigated in order to identify their cause.
3.	Corrective action is taken to rectify the non-conformance appropriate to the magnitude of the environmental impact encountered.
4.	Corrective or preventative action may take the form of retraining, disciplining, amendment of the Environmental Action Plan and/or this Environmental Manual.

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5.	A record of the incident including details of the corrective and preventative action is recorded on a Corrective Action form (Site Safety File), and its cause and effect is subject to Management Review in addition to routine monitoring.
6.	The completed Corrective Action forms are collected by the QA Manager in the course of site inspection and collated for management reporting purposes.
7.	Revised procedures are developed and implemented as considered appropriate and are reviewed accordingly.

4.5.4 CONTROL OF RECORDS

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

- Legible
- Identifiable
- Traceable
- Readily retrievable
- Protected against damage deterioration and/or loss
- Retained for an agreed time

The records to be retained must be:

- Appropriate to the Environmental Management System
- Appropriate to the Organisation
- Demonstrate conformance to the requirements of the International Standard.

	PROCEDURE
1.	The following records and similar documents are kept for a minimum period of two years in order to demonstrate conformance to the requirements of BS EN ISO 14001:2004: • Management Review records • Communications of an environmental nature from, and responses to, external interested parties • Monitoring and measurement records • Non-conformance records • Corrective and preventative action records • Environmental audit records • Environmental impact assessments • Staff training records • Calibration records

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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.
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4.5.5 INTERNAL AUDIT

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

- Reflects the Organisation's requirements for environmental management
- Reflects the requirements of the International Standard
- 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:

- Environmental importance of the activity concerned
- Results of previous environmental audits

Environmental audit procedures must address:

- The audit scope
- Audit frequency
- Audit methodologies
- Responsibilities and requirements for conducting audits and reporting results

	PROCEDURE
1.	There is a programme and up to date procedure to check (audit) that the Environmental Management System: • Reflects the Organisation's requirements for environmental management • Reflects the requirements of the International Standard • 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: • Environmental importance of the activity concerned • Results of previous Environmental Audits.

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	Environmental Audit procedures address: • The audit scope • Audit frequency • Audit methodologies • Responsibilities and requirements for conducting audits and reporting results.
2.	An Environmental Audit programme is maintained by the QA Manager ensuring that every section of the Environmental Management System is verified at least annually.
3.	More frequent Environmental Audits may be organised by the QA Manager depending on the importance of the activities being audited.
4.	At the beginning of every month, the QA 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.
5.	A member of staff, wherever possible independent of the activity being audited, is appointed by the QA Manager.
6.	The auditor refers to this Manual and determines the activities to be audited.
7.	The auditor selects a representative number of records to be audited on a random basis.
8.	The auditor advises any personnel concerned that an Environmental Audit is being undertaken and answers any questions they may have about the audit.
9.	The auditor examines the records selected in order to determine whether the activities identified above have been carried out correctly.
10.	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: • Prevent pollution • Control resource usage • Support environmental protection • Achieve continual improvement.
11.	The Environmental Audit record and all other documents relating to internal audits are passed to the QA Manager.
12.	The Environmental Audit record and all other documents relating to internal Environmental Audits are retained for inspection by QMS at the annual external Environmental Audit.

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13.	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 Corrective Action form as appropriate.
14.	The QA Manager ensures that the Environmental Audit results are discussed at the next Management Review.

4.6 MANAGEMENT REVIEW

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

- Suitable
- Adequate
- 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:

- The Environmental Policy
- Environmental objectives
- Other elements of the Environmental Management System

These changes may result from:

- The results of Environmental Management System audits
- The commitment to continual improvement

	PROCEDURE
1.	An Environmental Management Review is carried out at no greater than twelve monthly intervals. If appropriate, a corrective and preventive action plan is formulated.
2.	Environmental Management Review meetings may be held as a component of other Management System Reviews.
3.	Specific items included on the agenda of every Management Review are: • The continuing relevance of the Environmental Programme • Changing environmental aspects and impacts of the Organisation's activities • Internal feedback

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	• Results of the monitoring and measurement of achievement of environmental objectives, targets and programmes • Communications relating to environmental issues received from external interested parties • Changing Government Policy and National, EU and International environmental legislation, regulation and directives • The availability of new technology • The effectiveness of corrective and preventive actions • Environmental Audit findings • Environmental training requirements
4.	Records of the findings of the Management Review and any planned action are kept for a minimum of two years as part of the Organisation's environmental record system.
5.	Records made available at Management Reviews include: • Record of previous Management Reviews • Communications from external interested parties • Monitoring and measurement records • Non-conformance records • Corrective and preventive action records • 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.