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	Gent Fairhead & Co Limited (GFC) is committed to providing a quality operation of the Rivenhall IWMF, including associated services to its customs and clients, and to operating in accordance with its ISO 9001 Integrated Management System (IMS), OHSAS 18001 Occupational Health & Safety Management System and ISO 14001 Environmental Management System.	5
	Meeting these standards is the responsibility of the entire management and operational team. GFC is therefore committed to working with all stakeholders to support effective operation of the company’s IMS and to the achievement of its specific goals and objectives.	5
	GFC believes that the promotion of Occupational Health & Safety (OHSAS) is a positive investment in the well-being of its workforce. The Company takes very seriously its obligations and responsibilities under the OHSAS and related legislation.	5
	GFC is committed to the following guiding principles:-	5
	<ul style="list-style-type: none"> • to implement an Integrated Management System (IMS) that meets the requirements of ISO 9001:2008, OHSAS 18001:2007 and ISO 14001:2015;..... • to implement the highest possible standards of design, construction and operation within a quality management system (within the overarching IMS);..... • to provide employees with a safe working environment and a safe system of work as part of a safety system (within IMS), prioritising safety in all aspects of construction and operation;..... • to implement an effective Environmental Management System;..... • to develop and meet safety and environmental targets operation, including targets to minimise environmental nuisance; • to minimise the use of materials and reduce emissions to land, air and water including waste management by regularly reviewing its processes, emissions and use of resources, and by promoting a continual improvement philosophy throughout all activities;..... • to ensure that the responsibility for health & safety rests with key senior personnel and to ensure all personnel and subcontractors are aware of their responsibility in ensuring good health and safety practice; • to provide sufficient resources and facilities for the implementation of environmental nuisance abatement and waste management;..... • to regularly review its working practices to ensure that best practices are adhered to or adopted and that safety hazards are identified to avoid accidents, so far as is reasonable practicable;..... • to regularly monitor the safety of any equipment or machinery provided for use by employees, and to ensure that all employees who use or supervise the use of such equipment or machinery are properly trained in its use;..... • to the continual improvement of its performance by the monitoring of Quality Assurance, Health & Safety and Environmental Management issues within its operations and through appropriate involvement with its clients, customers, suppliers, regulatory authorities and the community; to implement preventative and corrective actions in a timely manner;..... • to comply with and, where possible, exceed the requirements of all contractual obligations and environmental, occupational health and safety legislation and to use the IMS to monitor compliance ;..... • to communicate this policy to all employees, subcontractors and relevant..... 	6

stakeholders;	6
• to review this policy on a regular basis and at least every year.	6
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Appendix A Cross Reference of ISO 14001 Requirements and Sections in the EMS Manual and Environmental Procedures.

Appendix B Controlled Document List

0.0 Terms and Definitions

Auditor	Person with the competence to conduct an audit
Continual improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy.
Corrective action	Action to eliminate the cause of a detected nonconformity.
Document	Information and its supporting media
Environment	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
Environmental aspect (EA)	Elements of an organisation's activities or products or services that can interact with the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental management system (EMS)	Part of an 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.
Environmental policy	Overall intentions and directions of an organisation related to its environmental performance as formally expressed by top management.
Environmental target	Detailed performance requirement 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	Person or group concerned with or affected by the environmental performance of an organisation.
Internal audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization are fulfilled.
Nonconformity	Non-fulfilment of a requirement.
Organisation	Gent Fairhead & Co Limited
Preventive action	Action to eliminate the cause of a potential nonconformity.
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 pollutants or waste, in order to reduce adverse environmental impacts.
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed.

1.0 General

1.1 Company Profile

Gent Fairhead & Co Limited ("GFC") is a privately-held UK development company that owns land and planning permission to construct and operate a fully integrated waste management facility ("IWMF") located at the former Rivenhall Airfield near Braintree in Essex.

Since receiving planning permission, GFC has developed detailed plans to build an energy from waste/combined heat and power plant, using tried and tested technology to achieve high fuel efficiency and maximise energy generation. Alongside the power plant is a facility to produce recycled pulp from waste office and white paper that utilises the steam generated by the power plant. This integrated facility is a genuinely Closed Loop solution that enables established technology to have maximum efficiency.

As part of the IWMF, other waste treatment and preparation processes will be established, such as a Materials Recycling Facility (MRF) and a Mechanical Biological Treatment Plant (MBT), leading to the removal of recyclates from incoming municipal and commercial waste leading to the production of refuse derived fuel (RDF) to be utilised in the CHP. In addition, an Anaerobic Digestion plant will treat food and green waste.

The IWMF will receive in total no more than 853,000 tonnes each year of recovered materials, being refuse derived fuel ("RDF") and recovered paper ("RCP") and will produce 45MW net of useful power, 98,000 tonnes of high quality recycled pulp, and other by-products.

1.2 Purpose of this Manual

This Manual defines GFC's Environmental Management System (EMS) for the activities involved in operating all aspects of the IWMF, and contains:

- a) GFC's Environmental Policy;
- b) Statements of responsibility and authority;
- c) An overview of the company's environmental procedures and controls;
- d) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- e) The appointment of the Environmental Management Representative (SHEQ MANAGER); and
- f) The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this EMS meets all *ISO 14001:2015 (or later)* requirements and provides guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

1.3 Scope of EMS

The scope of the EMS applies to the operation of the IWMF by GFC at the single site of Rivenhall Airfield, Braintree, Essex

2.0 Draft Policy Statement – Gent Fairhead & Co Limited for Rivenhall IWMF

Integrated Quality, Health & Safety and Environmental Management

Gent Fairhead & Co Limited (GFC) is committed to providing a quality operation of the Rivenhall IWMF, including associated services to its customs and clients, and to operating in accordance with its ISO 9001 Integrated Management System (IMS), OHSAS 18001 Occupational Health & Safety Management System and ISO 14001 Environmental Management System.

Meeting these standards is the responsibility of the entire management and operational team. GFC is therefore committed to working with all stakeholders to support effective operation of the company's IMS and to the achievement of its specific goals and objectives.

GFC believes that the promotion of Occupational Health & Safety (OHSAS) is a positive investment in the well-being of its workforce. The Company takes very seriously its obligations and responsibilities under the OHSAS and related legislation.

GFC is committed to the following guiding principles:-

- to implement an Integrated Management System (IMS) that meets the requirements of ISO 9001:2008, OHSAS 18001:2007 and ISO 14001:2015;
- to implement the highest possible standards of design, construction and operation within a quality management system (within the overarching IMS);
- to provide employees with a safe working environment and a safe system of work as part of a safety system (within IMS), prioritising safety in all aspects of construction and operation;
- to implement an effective Environmental Management System;
- to develop and meet safety and environmental targets operation, including targets to minimise environmental nuisance;
- to minimise the use of materials and reduce emissions to land, air and water including waste management by regularly reviewing its processes, emissions and use of resources, and by promoting a continual improvement philosophy throughout all activities;
- to ensure that the responsibility for health & safety rests with key senior personnel and to ensure all personnel and subcontractors are aware of their responsibility in ensuring good health and safety practice;
- to provide sufficient resources and facilities for the implementation of environmental nuisance abatement and waste management;
- to regularly review its working practices to ensure that best practices are adhered to or adopted and that safety hazards are identified to avoid accidents, so far as is reasonable practicable;
- to regularly monitor the safety of any equipment or machinery provided for use by employees, and to ensure that all employees who use or supervise the use of such equipment or machinery are properly trained in its use;
- to the continual improvement of its performance by the monitoring of Quality Assurance, Health & Safety and Environmental Management issues within its operations and through

appropriate involvement with its clients, customers, suppliers, regulatory authorities and the community; to implement preventative and corrective actions in a timely manner;

- to comply with and, where possible, exceed the requirements of all contractual obligations and environmental, occupational health and safety legislation and to use the IMS to monitor compliance ;
- to communicate this policy to all employees, subcontractors and relevant stakeholders;
- to review this policy on a regular basis and at least every year.

Endorsed by

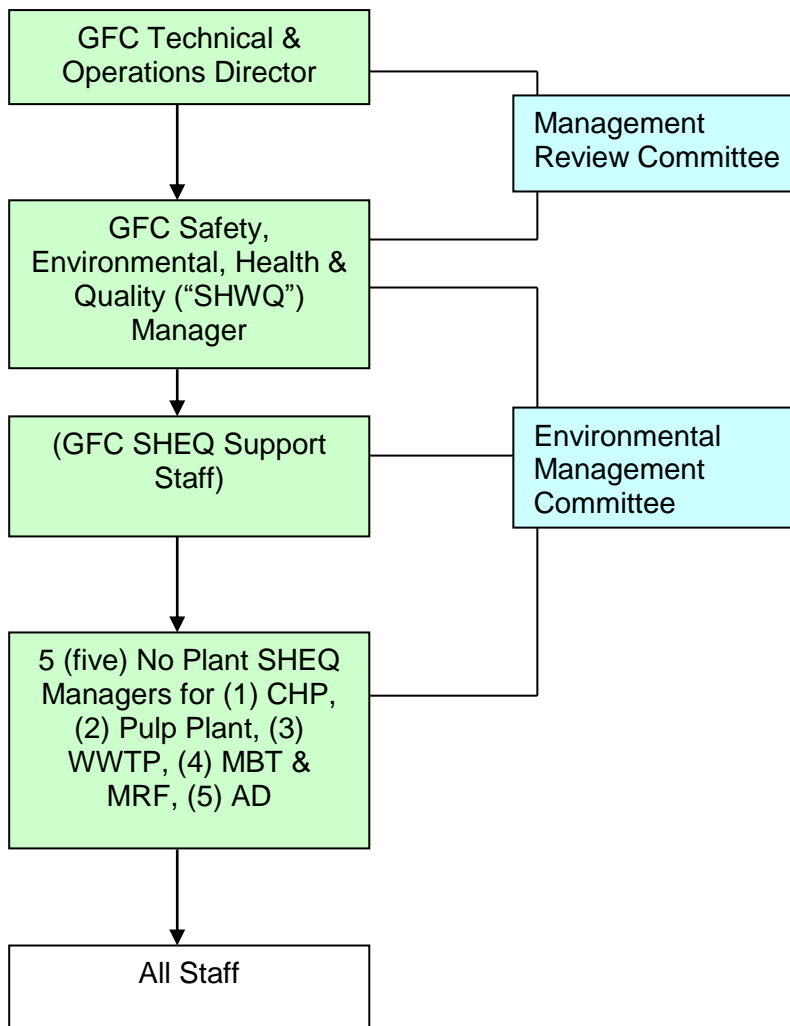
(Signature)

GFC Technical & Operations Director

Date :

3.0 Organisation

3.1 Organisation Chart – for IMS



3.2 Responsibilities (DRAFT)

This Section will define in detail the specific roles and responsibilities of all staff and subcontractors involved in the EMS such as senior management, SHEQ Managers and assistants, and the Environmental Management System Committee and Management Review Committee.)

3.2.1 Senior Management (Directors)

Senior Management is responsible for:

- a) endorsing the environmental policy;
- b) ensuring appropriate resource allocation to enable the effective operation and continual improvement of all aspect of the IMS (that includes the EMS).

3.2.2 Environmental Management Representatives (SHEQ Managers)

In terms of the EMS, the SHEQ Managers have the responsibility and authority for:

- a) ensuring that EMS requirements are established, implemented and maintained in

accordance with the ISO 14001 standard;

- b) ensuring that sufficient resources are allocated for the proper implementation of the environmental policy and the EMS;
- c) regularly reviewing the policy and the effectiveness of the EMS, and ensuring that the necessary changes are made.

The GFC SHEQ Manager is also the Chairman of the EMS Committee (see below) and has the responsibility and authority for :

- a) leading the EMS Committee to establish and implement the EMS according to ISO 14001 standard, and monitoring the performance of the EMS;
- b) coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained;
- c) handling and investigating nonconformity and ensuring corrective and preventive action has been taken to mitigate any impacts caused;
- d) reporting on the performance of the EMS to the top management for review and as a basis for improvement of the EMS.

The GFC SHEQ Manager, the EMS Committee and nominated Senior Management shall undertake the EMS management review six-monthly to ensure top management commitment and integration of the EMS with business strategies for its implementation and continual improvement.

3.2.3 GFC SHEQ Support Staff

If required, GFC SHEQ support staff would be responsible for:

- a) assisting the SHEQ Manager to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard;
- b) assuming the responsibility and action of the SHEQ Manager when unavailable.

3.2.4 Environmental Management System Committee (EMS Committee)

The EMS Committee will comprise of GFC's SHEQ Manager and the five individual plant SHEQ Managers from the appropriate subcontractors operating the CHP Plant, the Pulp Plant, the MBT & MRF, the AD Plant and the WWTP.

This committee is responsible for:

- a) the establishment and implementation of the EMS;
- b) the establishment and review of objectives, targets, and programmes;
- c) ensuring the effective implementation of environmentally-related operational controls and programmes;
- d) the internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff;
- e) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- f) providing leadership in the pursuit of environmental issues;
- g) any other EMS activities that are assigned by the SHEQ Manager;
- h) holding regular meetings (at approximately 3 month intervals).

3.2.5 Management Review Committee

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of senior Directors from all operating subcontractors and appropriate SHEQ Managers.

3.2.6 Plant SHEQ Managers

The Function / Departmental Managers are responsible for :

- a) establishing controls for the identified significant environmental aspects for his/her individual plant (all as listed under 3.2.2 above) according to procedures and instructions;
- b) ensuring that the EMS is properly implemented and that environmental matters are properly handled at all stages;

3.2.7 All Employees

All employees are responsible for:

- a) working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- b) reporting problems or deviations associated with environmental issues and the EMS to the EMS Committee.

4.0 Environmental Management System Requirements

GFC's EMS is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS will be established in accordance with ISO 14001:2015, and is described (in draft) in this section. Procedures for each component will be ultimately provided in the relevant Environmental Procedures (EPs) listed in Appendix A.

4.1 Environmental Management System Documents

The purposes of these EMS documents are as follows:

Environmental Policy	Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements and pollution prevention.
Environmental Management System Manual (EMS Manual)	Describes the environmental management system and outlines how the requirements of the International Standard (ISO 14001) are achieved. A cross-reference of the ISO 14001 clauses to the sections of this Manual is listed in Appendix A.
Objective(s) *	The overall environmental goals that GFC set to achieve.
Target(s) *	The set of measurable performance requirements that GFC establishes to achieve the objectives.

Programme(s) *	The programme and schedule which GFC implements to achieve the objectives and targets.
Environmental Procedures (EPs)	Define the roles, responsibilities, and actions to be taken to ensure that activities are performed and the EMS implemented in accordance with the environmental policy and the requirements of ISO 14001. A cross-reference of the ISO 14001 clauses to the EPs is listed in Appendix A.
Register of Environmental Aspects	Compiles the environmental aspects that are derived from the activities and services of GFC. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects.
Register of Legal and Other Requirements	Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to GFC.
Environmental Instructions (EIs)	Describe which and how activities should be performed to manage significant environmental aspects and to achieve the EMS ISO 14001 requirements.
Environmental Forms/Records	Record information for the audit trail and the assessment of environmental conditions and performance.

- Objectives and Targets, and associated Programmes will be provided as a single document.

4.2 Environmental Policy

(ISO 14001 Standard Clause 4.2)

GFC's environmental policy of is included in Section 2 of this document, as part of an overarching Integrated Management System that will also encompass Quality, Health & Safety. It outlines GFC's environmental commitments of with respect to its operations, activities, and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of GFC's activities, products and services has been considered. The policy is endorsed by GFC's Technical & Operations Director and the policy shall be reviewed during the Management Review Meeting.

The policy stipulates GFC's commitments to continually improve its environmental management and prevention of pollution. GFC is also committed to comply with applicable legal requirements and other requirements to which GFC and all of its subcontractors subscribe and which relate to its environmental aspects. The environmental policy provides a framework for setting and reviewing objectives and targets, will be maintained, implemented and communicated to all employees of GFC and its operational sub-contractors.

This policy will be available to the public.

4.3 Planning

GFC shall follow a "plan-do-check-act" process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of GFC's Register of Environmental Aspects, and the Register of Legal and

Other Requirements. Together with GFC's environmental policy, GFC's objectives and targets are established, and appropriate programmes are formulated to achieve these objectives and targets in conjunction with its operational subcontractors.

4.3.1 Environmental Aspects

(ISO 14001 Standard Clause 4.3.1)

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, GFC shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

GFC shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

GFC shall keep this information up-to-date.

Relevant procedure: EP-01 Identification of Environmental Aspects and Significance Evaluation

4.3.2 Legal and Other Requirements

(ISO 14001 Standard Clause 4.3.2)

GFC shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects

GFC shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

GFC shall keep this information up-to-date.

Relevant procedure : EP-02 Review of Legal and Other Requirements

4.3.3 Objectives, Targets and Programme(s)

(ISO 14001 Standard Clause 4.3.3)

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within GFC. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, GFC shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the operations, together with the means and time frame by which they are to be achieved.

GFC's Technical & Operations Director approves the objectives, targets and programmes proposed by the EMS Committee before implementation. The SHEQ Manager will ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the EMS Committee every 3 months. The SHEQ Manager will lead the EMS Committee in revising the objectives, targets and programmes as necessary.

GFC will ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the SHEQ Manager will revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

The SHEQ Manager will also maintain obsolete objectives, targets and programmes as an EMS record for three years.

4.4 Implementation and Operation

The implementation of the EMS requires GFC to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

4.4.1 Resources, Roles, Responsibility and Authority

(ISO 14001 Standard Clause 4.4.1)

Top management of GFC will commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

GFC will employ directly the SHEQ Manager and support staff for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

4.4.2 Competence, Training and Awareness

(ISO 14001 Standard Clause 4.4.2)

GFC will ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

GFC will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote

workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

GFC will establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental management system;
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;
- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures;

Relevant procedure: EP-03 Training

4.4.3 Communication

(ISO 14001 Standard Clause 4.4.3)

For internal communication, the SHEQ Manager will ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice board, or is published on the intranet or newsletters.

Employees with enquiries / complaints regarding the EMS and/or environmental issues of GFC shall inform relevant plant SHEQ Manager. The designated member of EMS Committee representing each plant operation shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the SHEQ Manager will determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy will be available at the office and on the IWMF web page. All internal and external enquiries / complaints / communications will be discussed and reviewed during the EMS Committee meeting and the decision will be recorded on meeting minutes.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g. publish environmental report.

Relevant procedure: EP-07 Enquiry / Complaint / Nonconformity Handling

4.4.4 Documentation

(ISO 14001 Standard Clause 4.4.4)

The Environmental Management System documentation encompasses four levels as described below:

The first level is the *Environmental Management System Manual* (this document) which includes GFC's environmental policy (specifying the principal objectives and

environmental commitments of GFC), and a broad description of how GFC addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between GFC's EMS and the ISO 14001 Standard. An individual document of *Objectives, Targets and Programmes* is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continual improvement in environmental performance.

The second level is the *Environmental Procedures (EPs)*, which include all procedures that GFC will follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when. Appendix A shows the relationship between various environmental procedures and the ISO 14001 Standard clauses. Register of Environmental Aspects, and Register of Legal and Other Requirements are derived from the procedures and act as the foundation of the EMS which the company subscribed to.

The third level is the *Environmental Instructions (EIs)*, which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with GFC's operations and activities.

The fourth level is *Environmental Records*, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

4.4.5 Control of Documents

(ISO 14001 Standard Clause 4.4.5)

The essences of EMS documentation controls are:

- they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.

GFC will ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. GFC will establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

Relevant procedure: EP-04 Control of Documents

4.4.6 Operational Control

(ISO 14001 Standard Clause 4.4.6)

GFC will establish, implement and maintain operation control procedures to manage its significant environmental aspects.

GFC will ensure that all operations and activities, carried out by GFC's employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. GFC will influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

Relevant instructions: EI-xx

4.4.7 Emergency Preparedness and Response

(ISO 14001 Standard Clause 4.4.7)

GFC shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

GFC shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

GFC shall also periodically test the procedure and the preparedness where practicable.

Relevant procedure: EP-05 Environmental Emergency Preparedness and Response

4.5 Checking

While implementing the EMS, GFC will monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

4.5.1 Monitoring and Measurement

(ISO 14001 Standard Clause 4.5.1)

GFC will establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

Relevant procedure: EP-06 Environmental Monitoring and Evaluation of Compliance

4.5.2 Evaluation of Compliance

(ISO 14001 Standard Clause 4.5.2)

To meet the company's commitment to compliance, GFC will regularly monitor and evaluate the compliance status of the applicable environmental legal requirements (section 4.5.2.1) and other requirements (section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

Relevant procedure: EP-06 Environmental Monitoring and Evaluation of Compliance

4.5.3 Nonconformity, Corrective Action and Preventive Action

(ISO 14001 Standard Clause 4.5.3)

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, GFC shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- handle and investigate nonconformity;
- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;
- implement and record any changes in the documented procedures resulting from corrective and preventive action; and

GFC will also ensure that any necessary changes are made to environmental management documentation.

Relevant procedure: EP-07 Enquiry / Complaint / Nonconformity Handling

4.5.4 Control of Records

(ISO 14001 Standard Clause 4.5.4)

Records shall be maintained to keep track of GFC's environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard, and the results achieved.

GFC will establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

Relevant procedure: EP-08 Control of Records

4.5.5 Internal Audit

(ISO 14001 Standard Clause 4.5.5)

GFC shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- a) determine whether or not the environmental management system:
 - conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
 - has been properly implemented and maintained;
- b) provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

GFC shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.

Relevant procedure: EP-09 Internal Audit

4.6 Management Review

(ISO 14001 Standard Clause 4.6)

The “plan-do-check-act” cycle shall require GFC’s Directors to act and review the environmental management system periodically to ensure its suitability, adequacy and effectiveness.

Before the Review, the SHEQ Manager will schedule for the management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The GFC Directors, SHEQ Manager and support staff, together with the EMS Committee will take part in the annual management review. They will assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, operational and business activities, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review will include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes;
- review of legal compliance and compliance with other requirements (including subcontractor compliance on GFC’s activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;
- review of nonconformities and the status of corrective/preventive actions;

- communications from external interested parties, including complaints;
- areas for improvement with respect to environmental performance;
- adequacy of emergency preparedness and response;
- changing circumstances, including developments in legal and other requirements related to its environmental aspects,
- identify the need for modification of the existing EMS in light of the above items, and
- follow-up action from previous management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in GFC’s environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the SHEQ Manager will retain it as an EMS record. Maintenance of the records shall be in accordance with EP-08.

Appendix A Cross Reference of ISO 14001 Requirements* and Sections in the EMS Manual and Environmental Procedures.

ISO Clause	EMS Manual Section No.	EP Ref. No.
4.1 General Requirements	4.1	–
4.2 Environmental Policy	4.2.	–
4.3 Planning	4.3	–
4.3.1 Environmental Aspects	4.3.1	EP-01
4.3.2 Legal and Other Requirements	4.3.2	EP-02
4.3.3 Objectives, Targets and Programme(s)	4.3.3	–
4.4 Implementation and Operation	4.4	–
4.4.1 Resources, Roles, Responsibility and Authority	4.4.1	–
4.4.2 Competence, Training, and Awareness	4.4.2	EP-03
4.4.3 Communication	4.4.3	–
4.4.4 Documentation	4.4.4	–
4.4.5 Control of Documents	4.4.5	EP-04
4.4.6 Operational Control	4.4.6	All EIs
4.4.7 Emergency Preparedness and Response	4.4.7	EP-05
4.5 Checking	4.5	–
4.5.1 Monitoring and Measurement	4.5.1	EP-06
4.5.2 Evaluation of Compliance	4.5.2	EP-06
4.5.3 Nonconformity, Corrective Action and Preventive Action	4.5.3	EP-07
4.5.4 Control of Records	4.5.4	EP-08
4.5.5 Internal Audit	4.5.5	EP-09
4.6 Management Review	4.6	–

* ISO 14001:2015 is referred.

Appendix B Controlled Document List

Document No.	Document/Form Name
CP-01	Environmental Policy
O&T-YYYY	Objectives, Targets and Programmes
EAR-01	Register of Environmental Aspects
LR-01	Register of Legal and Other Requirements
EM-01	Environmental Management System Manual
EP-01	Identification of Environmental Aspects and Significance Evaluation
EP-02	Review of Legal and Other Requirements
EP-03	Training
EP-04	Control of Documents
EP-05	Environmental Emergency Preparedness and Response
EP-06	Environmental Monitoring and Evaluation of Compliance
EP-07	Enquiry / Complaint / Nonconformity Handling
EP-08	Control of Records
EP-09	Internal Audit
EI-01	Environmental Office Practices
EI-02	Green Procurement
EI-03	Environmental Practices for Using Company's Car
EI-04	Waste Management
EI-05	Air Pollution Control
EI-06	Water Pollution Control
EI-07	Noise Pollution Control
EI-08	Resource Conservation
EI-09	Handling and Storage of Chemicals