ENVIRONMENTAL MANAGEMENT PLAN

ADMINISTRATION PROCEDURES MANUAL

GLASS RECOVERY SERVICES

126 ANDREWS ROAD, PENRITH

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NO:	AP1.1	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.1 COMMUNICATION PROCEDURE		

1. PURPOSE

To encourage open communication between Glass Recovery Services and all groups with which the company interfaces. This includes Community groups, regulatory authorities and non-regulatory agencies, and other industries.

2. RESPONSIBILITIES

- Production Manager
- Environmental Manager

3. PROCEDURE

Glass Recovery Services shall deal with the neighbouring community in a manner that highlights the company's concern for both their amenity and the local environment.

The Switchboard, upon receipt of an enquiry shall:

- Record in Diary or Log Book:
  - Name of Caller;
  - Address/Employer (if appropriate);
  - Telephone Number; and
  - Details of Enquiry.

- Connect/refer caller to one of the following staff members who are able (and authorised) to discuss the subject of the enquiry with the caller.
  - Production Manager;
  - Environmental Manager; and
  - Other designated staff members.

- Authorised staff member requests details of the information required by the caller.

- Authorised staff should respond to the enquiry directly if possible, or agree to send out official correspondence which effectively answers the callers request for information.

Glass Recovery Services shall foster open communications with the other stakeholders of the site to ensure that an integrated approach is used to deal with issues which reflect on all stakeholders.

- The Environmental Manager shall liaise with adjacent facilities to evaluate what communications protocols are required to ensure any environmental management issues from either party are addressed promptly.

- The Environmental Manager shall request to be included on adjacent facilities distribution lists regarding internal communications which relate to the Glass Recovery Services' activities.

- The Environmental Manager shall include adjacent facilities on distribution lists regarding matters that relate to them.

- Regular internal communications regarding environmental management of the site (this may involve including the environment as an agenda item on monthly site meetings) shall be undertaken and documentation retained. This may include but is not limited to environmental issues have arisen, modifications to environmental management at the site or findings of a workplace inspection.

- Environmental management shall be included in the site induction and shall be communicated to all new employees and contractors.

- All internal and external communications shall be documented and retained by the relevant personnel.

- Review this procedure and established protocols if changes to contractual or licence agreements occurs.

- Review this procedure and established protocols if changes to stakeholders occurs.

NO:	AP1.2	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.2 COMPLAINTS RESPONSE		

1. PURPOSE

To ensure that a "complaints oriented" process is in place to focus on the type, date, time and origin of the complaint, together with "feedback" to the complainant regarding (if appropriate) investigation of the complaint and any remedial action arising from the complaint.

2. SCOPE

The procedure can be applied to such issues as excessive noise, odour and emissions to air. The essential element of the procedure is:

Scenario A: A resident/occupier of adjoining premises telephones to register a complaint or ask questions related to the operation of the site (eg, noise, waste, odour, air emission).

Scenario B: An adjacent facility or a regulatory authority has received a complaint through their Complaint Handling Procedure and their investigations include the area and operations at the sites.

3. RESPONSIBILIITES

- All staff and contractors of Glass Recovery Services
- Production Manager
- Environmental Manager

4. PROCEDURE

- All complaints or enquiries should be handled in a courteous manner, every complaint is a potential opportunity for improvement in environmental management.

- Record in Log Book and on a Complaint Response Form:
  - Name of Complainant;
  - Address;
  - Telephone Number; and
  - Details of Complaint:
    - date, time of occurrence, precise location of event.

- Connect/refer caller to one of the following staff members who are authorised to discuss the complaint with the caller:
  - Production Manager;
  - Environmental Manager; and
  - Personnel with environmental responsibilities.

- If on-site personnel are not available re-direct the caller to a nominee (eg. Safety, Quality and Environmental Officer who has expertise in assessing the validity of the complaint eg., noise or odour measurement, materials analysis, etc.).

- Authorised staff member requests details of the complaint or information required by the caller.

- Authorised staff also agrees to have complaint investigated or to send out official correspondence from the Environmental Manager which effectively responds to the callers complaint or request for information.

- Complaint investigated by site staff or nominee and action appropriate to the circumstances taken.
  - Appropriate action may include:
    - Conducting an on-site inspection to determine any relationship between maintenance operations and time of occurrence of the complaint, eg., complaints about noise emissions during hours outside of maintenance operations.
    - Details of material emissions observed by the complainant and relationship to on-site materials inventory.
    - Where complaints relate to excessive noise, conduct of noise measurements at location of the complaint (similar time of day). Compare results with previous measurements (if available) and where an increase has occurred, further investigate operating sources, recommend remedial action for preparation of an action plan.

- On completion of the action plan ensure that complainant is fully informed of remedial measures.

- Complete both Complaint Response Log and Log Index.

- If remedial actions involve changes to established work practices, notify supervisory staff and where appropriate modify job instructions and ensure that employees are retrained accordingly.

- Communications between Glass Recovery Services and adjacent facilities in relation to any complaints should be carried out with reference to the communications procedure.

GLASS RECOVERY SERVICES	COMPLAINT RESPONSE	PAGE 1 OF 2

REF: 1.2F01 REV: 1

LOG BOOK REFERENCE NO:……

DATE: .....……TIME:…….....AM/PM

NAME OF PERSON WHO RECEIVED CALL:…….....

NAME OF COMPLAINANT:……TELEPHONE NO……. .....

ADDRESS: .....

DETAILS OF COMPLAINT:

DATE OF OCCURANCE:……TIME AM/PM:…….....

TYPE OF INCIDENT:

NOISE	☐	STORMWATER	☐
AIR EMISSIONS	☐	ODOUR	☐
TRAFFIC/TRANSPORT	☐	FIRE	☐
EROSION/SEDIMENT	☐	WASTE	☐
OTHER	☐	DETAILS:……	

PRECISE LOCATION OF INCIDENT: .....

PARTICULAR DETAILS RELATING TO THE INCIDENT:.....

.....

.....

GLASS RECOVERY SERVICES	COMPLAINT RESPONSE	PAGE 2 OF 2

ACTION TAKEN:

COMPLAINANT TRANSFERRED TO:

PRODUCTION MANAGER ☐ SUPERVISOR ☐
Name: _____

ENVIRONMENTAL MANAGER ☐ AUTHORISED PERSONNEL ☐

MESSAGE TAKEN FOR:.....

CORRECTIVE AND PREVENTATIVE ACTION:

INFORMATION BULLETIN SENT ☐

COMPLAINT INVESTIGATED BY: ..... CPAR NO.....

RESULTS OF INVESTIGATION: .....

.....

.....

.....

ON COMPLETION OF CORRECTIVE AND PREVENTATIVE ACTION:

LETTER SENT TO COMPLAINANT YES NO N/A DATE:.....

WORK PRACTICE MODIFIED YES NO N/A DATE:.....

COMPLAINT RESPONSE COMPLETE: .....
PRINT NAME

SIGNATURE: .....

DATE: ..... TIME: .....AM/PM

COMPLAINT RESPONSE LOG BOOK INDEX

REF: 1.2F02 REV: 1

COMPLAINT NUMBER	DATE	COMPLAINANT	CALL RECEIVED BY	RESPONSIBLE MANAGEMENT REPRESENTATIVE	COMPLAINT ACTION AND RESPONSE SIGN & DATE

NO:	AP1.3	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.3 CONTROL OF DOCUMENTS & RECORDS		

1. PURPOSE

To ensure all documents and records relating to the environment, environmental management, incidents, approvals and actions are controlled.

2. RESPONSIBILITY

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. REFERENCES

- AS/NZS ISO 14001:2004 – Environmental Management Systems – Requirements with guidance for use.

4. DEFINITIONS

Environmental Document
A written account containing information related to environmental approvals, actions or activities.

Environmental Record
Anything providing evidence or information about past events relating to the environment.

5. PROCEDURE

- For the purposes of this procedure, environmental documents and records shall be divided into three (3) categories as follows:

  (i) Licences and approvals such as the site's Environment Protection Licence (EPL), Development Consent Condition and General Terms of Approval;
  (ii) Active Documents such as the Environment Management Plan, Emergency and Pollution Incident Response Management Plan, Work and Environmental Procedures; and
  (iii) Records such as Workplace Inspection Records, Waste Records and Monitoring Results.

- A register of all environmental documents and records must be maintained with the EMP. A sample register is provided overleaf.

- All environmental documents and records must be made available to all staff upon request.

Licences and Approvals

- Copies of current versions of all environmental licences and approvals must be maintained by Environmental Manager and made available to all staff and over the internal computer system.

- When an environmental licence or approval is re-issued, revised or updated by a regulatory authority, the previous version must be identified as "superseded". All staff should be made aware of the updated version of the licence or approval.

Active Documents

- Changes to active documents must be approved by the Environmental Manager prior to use. The revision status of active documents must be identified upon any changes made.

- Review of active documents should be undertaken at least annually. Responsible persons should be identified on the document.

- Ensure current versions of documents are available at areas of use.

- All active documents must have a unique identification number and be registered in the document register.

Environmental Records

- All environmental records must contain the date of issue and list the responsible person within the record.

- Environmental records must be maintained by the responsible person for at least 4 years after the date of issue.

DOCUMENT REGISTER (Example Only)

REF: 1.3F01

Document Name & Number	Status / Date/ Revision No.	Responsible Person	Location(s)
Environmental Protection Licence No. ____			• Office • System
Sydney Water Tradewaste Agreement No. ____			• Office • System • WWTP
Development Consent Conditions, DA No. ____			• Office • System
Environmental Management Plan	1		• Office • System
Waste Records / Register	N/A		
Material Safety Data Sheets	Various		
Internal Environmental Audits			
External Environmental Audits			

NO:	AP1.4	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.4 CORRECTIVE AND/OR PREVENTATIVE ACTION		

1. PURPOSE

To address actual and potential environmental non-conformities by implementing corrective and/or preventative actions.

2. RESPONSIBILITY

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. DEFINITIONS

Corrective Action

Action taken to correct an identified or detected non-conformance with existing procedures for a number of reasons which could include failures, non-conformances, inadequate or non-existent procedures, inadequate working conditions, etc.

Preventative Action

Action taken prior to detection of a non-conformance etc. to prevent an incident or corrective action occurring. Used for all pro-active continuous improvements.

4. PROCEDURE

Identifying & Addressing Non-conformities

- Non-conformities relating to the environment can be detected by the following:

  (iv) In-house detection of non-conformances;
  (v) Audit verified non-conformance;
  (vi) A near miss of potential non-conformance; or,
  (vii) Public complaint.

- Prior to the implementation of new process, activity or product, identification of environmental aspects and potential significant impacts should be undertaken. In addition to this, safeguards or procedures should be put in place to minimise the risk of these impacts from occurring.

- When a non-conformity is identified, corrective action to mitigate the environmental impact should be put in place. Further investigation into the cause of the non-conformity would need to be undertaken to determine what preventative measures can be implemented to ensure the non-conformity does not recur.

Corrective and/or Preventative Action Request (CPAR) Forms

- Corrective and/or Preventative Action Request (CPAR) forms shall be kept and overseen by management.

- Forms shall be issued to appropriate personnel with control over the source of the non-conformance.

- The issuing of the CPAR form shall be initiated by any of the following events, if considered justified:

  (i) NSW EPA, Penrith City Council, Sydney Water or other regulatory agency direction or request;
  (ii) In-house detection of non-conformances or potential non-conformances;
  (iii) Audit verified non-conformance; or
  (iv) Public complaint.

- Records shall be maintained by management, who shall also be responsible for defining, implementing and maintaining Corrective and Preventative Action procedures.

GLASS RECOVERY SERVICES	CORRECTIVE AND/OR PREVENTATIVE ACTION	REF: 1.4F01 REV: 1

☐ CORRECTIVE ACTION ☐ PREVENTATIVE ACTION

Name of personnel requesting corrective/preventative action: Signature:

_____ _____

Personnel responsible for action: Date:

_____ _____

Outline of the 'Initiating Event' and necessary corrective and/or preventative actions (to be filled out by those requesting action):

Actions taken to fulfil the requirement of the corrective and/or preventative action:

Corrective and/or preventative action complete:

Signature : Date:

NO:	AP1.5	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.5 ENVIRONMENTAL TRAINING		

1. PURPOSE

The purpose of this procedure is to set out the process to follow to:

- identify staff and/or contractors competency requirements for the activities which they perform which can, or have the potential to cause significant environmental impacts;
- make certain training activities to ensure adequate awareness and competency to undertake these activities are completed; and
- retain associated records.

2. RESPONSIBILITIES

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. REFERENCES

- AS/NZS ISO 14001:2004 – Environmental Management Systems – Requirements with guidance for use.

4. DEFINITIONS

Competence
The ability to understand information presented, to appreciate the consequences of acting (or not acting) on that information, and to make a choice.

Environmental Training
The transmission of knowledge, skills, attitudes, motivations, etc., concerning the environmental requirements of activities, products or services to workers, supervisors, managers, and others through classroom sessions, demonstrations and simulated exercises. The objective of environmental education and training is favourable behaviour change.

Awareness
To be mindful or heedful of something, knowledge gained through perceptions, the attitudes of others.

Senior Management
For the purposes of this procedure, Senior Management include all staff with a managerial role.

5. PROCEDURE

TRAINING OBJECTIVES

The objectives of environmental training are:

- To ensure that a continuous "state of readiness" exists for dealing with anticipated emergencies.
- To create and maintain an organisation capable of dealing with anticipated emergencies.
- To ensure that attendance, completion and review of the results of training is documented and recorded.
- To emphasise the importance of conformity with the environmental policy and procedures and with the requirements of the EMP.
- To make staff aware of the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance.
- To ensure roles and responsibilities in achieving conformity with the requirements of the EMP are known and understood.
- To ensure environmental procedures relating to their work activities are known and understood.

The following levels of knowledge are considered a minimum requirement for a complete understanding of emergency and environmental procedures.

LEVEL 1 – All Staff

Immediate and detailed knowledge required by employees at the site, either permanent or casual. This also includes contractors.

- How to communicate an emergency situation and who to contact.
- How to respond, what assistance is available.
- Where to go in an emergency, how to evacuate to a safe location, who will co-ordinate an evacuation.
- Awareness of environmental aspects and potential impacts of their work activities and the environmental benefits of improved personal performance.
- Awareness of the corporate environmental policy and objectives of the site EMP.
- Awareness of individual accountability under environmental legislation applicable to the site including penalties for offences under the Protection of the Environment Operations Act, 1997.

LEVEL 2 – Personnel with Environmental Responsibilities

Level 2 employees would include those individuals with specific environmental responsibilities and those at a supervisory level. In addition to having a complete understanding of all level 1 requirements, training in environmental management and/or procedures specific to their job requirements would be necessary. Specific responsibilities would need to be designated and clearly understood.

Training in environmental management would include how manage environmental aspects of the site activities and how to identify environmental improvements.

Specific and detailed information is required by persons trained to respond to emergency situations including supervisors, persons with accredited first-aid skills, service personnel and means of contact with external emergency services.

Personnel with specific environmental duties would need to be trained in the relevant procedures such as incident prevention, maintenance and environmental monitoring, correct storage and handling of dangerous goods and competency testing undertaken on a regular basis.

LEVEL 3 – Senior Management

Senior management would require a complete understanding of emergency and environmental procedures (Level 1 training) and environmental management (Level 2 training). In addition to this, the following are considered the minimum requirement for environmental training of senior management:

- General knowledge of their responsibilities, statutory duties, media contact and how the procedures are designed to operate.
- Awareness of environmental aspects and potential impacts of their work activities, new and existing site operations and the environmental benefits of improved personal performance.
- Knowledge and awareness of current legislation and impacts of changes to plant operations on legal and other requirements and environmental management on site.

SPECIFIC TRAINING DUTIES

CEO / General Manager

The Company Director has the duty of ensuring that adequate resources are available to provide all employees with the appropriate level of environmental training required to undertake their work tasks.

Environmental Officer

Duties of the Environmental Officer in relation to environmental training are to:

- Ensure that environmental responsibilities are delegated to cover all requirements of the EMP.
- Ensure the site environmental training program appropriately covers all requirements in this procedure.
- Ensure competency testing is carried out on a regular basis and documented.
- Liaise with the Supervisors and Plant Manager to ensure all personnel are appropriately trained and competency tested.

Production Manager

Functional duties include:

- Establish and maintain an Evacuation Plan for the site, including documentation, training handouts, signposting, etc.
- Establish and ensure relevant Emergency Response Procedure for site.
- Liase with external emergency services, establish a timetable for regular training and simulated exercises to test the adequacy and effectiveness of the Plan.
- Ensure that routine inspections of all emergency equipment is carried out and results documented.
- Establish budgets for the procurement and servicing of emergency equipment including personal protective and communication equipment, (eg. respiratory protection, loud hailers, spill control hardware, etc).
- Deputising duties in relation to emergency response during periods of absence from the site.
- Establish an environmental training program to be implemented at the site including maintaining and updating the environmental component of the site induction.
- Ensure appropriate training is provided to individuals, particularly those required to undertake specific environmental duties on a day to day basis.
- Ensure individuals required to carry out specific environmental duties on a day to day basis undertake competency testing.

Nominee

Normally resident in a particular area or department, delegated by the Chief Warden to carry out such duties as:

- First response to the emergency (spillage or fire).
- Where appropriate, the orderly evacuation of people to designated safe locations.

Level of knowledge will include the location of evacuation exits and pathways, designated safe areas (marshalling areas), protection systems and emergency contacts.

Supervisors

Supervisors have the responsibility for providing the training to site employees. The main functional duties in relation to environmental training would include:

- Ensuring all new employees undergo environmental training as part of their site induction.
- Ensuring the appropriate training is provided to employees with specific environmental responsibilities.
- Assessment of staff's competence and maintaining training records.

TRAINING REQUIREMENTS

- The training requirements of all levels of personnel performing work related to environmental issues shall be regularly assessed and recorded. Training shall relate to all tasks completed in fulfilling work duties and responsibilities.

- Regular training programmes shall be undertaken either in-house, through consultants, or through another recognised third party.

- All new employees or contractors shall undergo site induction training. Induction training should include environmental awareness and testing for understanding.

- Records of personnel training involvement and level of competency attained shall be kept and maintained.

- Personnel's competency shall be regularly tested.

- Training should cover as a minimum but not be restricted to the following areas:
  - Environmental awareness;
  - Legal Requirements;
  - Emergency response including spill procedure; and
  - EMP and associated procedures including incident prevention & control, maintenance and environmental monitoring.

Environmental Awareness

Environmental awareness training shall be included in the site induction and shall be completed by all site employees and contractors. Trained staff shall be required to have a basic understanding of environmental issues related to the site activities. The training shall include but not be limited to the following:

- Basic environmental definitions including pollution in terms of noise, air, waste, stormwater, wastewater and soil & groundwater;
- The corporate environmental policy;
- Basic overview of environmental legislation;

- A basic description of the environmental aspects and potential impacts of the site operations. Significant environmental impacts should be highlighted;
- Controls and safeguards that are in place to minimise environmental impacts of operations and how these work;
- Awareness and main objectives of the site EMP;
- Awareness of their individual legal responsibilities with regards to the environment and that they are accountable for their own actions; and
- Awareness of staff to notify concerns and / or incidents to.

Emergency & Spill Response

A core organisation shall be trained to co-ordinate activities during emergency situations:

- As a priority, to be able to move persons away from life-threatening situations and account for their presence at designated safe locations. This may include partial or total evacuation.
- To be able to initiate a first response to emergencies, including alerts to external emergency services so that control is exercised to reduce the risk of injury or damage to property.
- To be able to co-ordinate the isolation of equipment necessary to bring the emergency under control.

The organisation will be trained to a level of capability for dealing with:

- Spillage incidents or emissions and the controlled disposal of wastes in accordance with legislative requirements;
- Initial response to fire using available fire control equipment;
- Medical emergencies in which there is an immediate threat to life safety and requiring accredited first-aid skills; and
- Bomb threats or other security breaches.

The <Title of responsible person> or nominated staff member will at times also be required to liase with responding external emergency services.

EMP & Environmental Procedures

Training and competency testing in specific environmental procedures would be required for individuals with specific environmental responsibilities.

Specific duties would include but are not limited to:

- Specialised first aid and emergency duties;
- Maintenance of pollution control equipment;
- Any environmental monitoring such as stormwater monitoring and tradewaste compliance monitoring;
- The storage and handling of dangerous goods; and
- Waste Management.

EMP & Administrative Procedures

Training in specific administrative procedures would be required for individuals with specific environmental administrative responsibilities.

Specific duties would include but are not limited to:

- Environmental auditing;
- Legal / Other Requirements;
- Aspects and potential impacts;
- Incident response and implementation of corrective and preventative actions; and
- Administrative duties including document control and how to respond to complaints.

Pollution Incident Response Management

Training in Pollution Incident Response Management is detailed in the Emergency and PIRMP for the site.

COMPETENCY TRAINING DOCUMENT

REF: 1.5F01 REV: 1

Name of person providing : induction and training

Signature :

Name of employee :

Signature :

Date(s) of attendance :

Outline of the course content

Course to include :

Topics to be covered	Tick when topic finished

Induction and Training in …….. has been completed and understood. I now feel competent to ……

Signature : Date:

(Employee/Attendee)

Induction and Training Attendee demonstrated appropriate competencies in ……..……

Signature : Date:

(Trainer)

NO:	AP1.6	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.6 IDENTIFYING ASPECTS & IMPACTS AND DETERMINING SIGNIFICANCE		

1. PURPOSE

The purpose of this procedure is to set out the process to follow to identify environmental aspects of the site's activities, products and services that can be controlled and influenced by you. Also, to document how to determine those aspects that have or can have significant impacts on the environment. In particular, this procedure would be used when a new activity or product or when a process within the system is modified. This would enable any potential significant impacts identified to be addressed to ensure that the risk of it occurring is minimised. The procedure needs to address the development, implementation and maintenance phases of the EMP.

2. RESPONSIBILITIES

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. REFERENCES

- AS/NZS ISO 14001:2004 – Environmental Management Systems – Requirements with guidance for use.
- AS/NZS ISO 14004:2004 – Environmental Management Systems – General guidelines on principles, systems and support techniques.

4. DEFINITIONS

Environment

Environment is defined in ISO14001, 3.6 as: *'Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.'*

Environmental Aspect

An environmental aspect is defined in ISO14001, 3.6 as: *'An element of the organisation's activities, products or services which can interact with the environment.'*
NOTE: A significant environmental aspect has or can have a significant environmental impact.

Environmental Impact

An environmental impact is defined in ISO14001, 3.6 as: *'Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects'.*

Significant

Having or likely to have a major effect. With respect to an environmental effect, an adverse impact in the context of its magnitude, geographic extent, duration, frequency, degree of reversibility, possibility of occurrence or any combination of the foregoing.

5. PROCEDURE

Identifying Aspects

- Generate a process flow diagram of the existing or new process / activity. Include all ancillary activities and resources required (such as chemicals) for the process to be carried out. Identify how these activities will be undertaken. Referring to or developing standard operating procedure may be useful.

  For example: A simple example would be unloading a delivery of raw materials using a forklift truck. Resources used would include fuel and labour.

- Identify any waste products or environmental emissions that would be generated from the activity and how these will be managed.

  In addition to the example from the previous point, waste products would include products of combustion from the use of fuel and the generation of waste oil from the engine and gearbox. Generation of noise from the operation of the forklift would also be a potential impact.

- Consider how these activities, resources and waste materials may interact with the environment. Both normal and abnormal conditions including start-ups, shut downs, maintenance and emergency situations should be considered. It is recommended that quantitative and or qualitative data be collected to aid understanding and identification. Participation of staff most familiar with each activity, product or service would also be beneficial.

  The products of combustion generated in the previous example would be released to the air. Noise from forklift operations would change the surrounding acoustic environment.

- Maintain all documentation relating to the generation or modifications to the process flow diagram and identification of aspects such as the Environmental Aspects Register, according to the Control of Documents and Records procedure.

Identifying Impacts

- Once the aspects of the existing or new process have been identified and recorded, the potential impacts on the environment can be determined. Consider how these aspects could impact on the surrounding air, water, land, natural resources, flora, fauna and humans.

  From the previous forklift operation example, potential impacts from the aspects identified can be determined as follows:
  - There is potential for a leak or spill of fuel onto the ground and contamination of waters and land;
  - The release of products of combustion to air may impact by generating air pollution; and
  - A change to the acoustic environment due to the generation of noise which may impact on nearby residences by causing nuisance noise.

- Potential impacts should be recorded in accordance with the Control of Documents and Records procedure.

Determining Significance

- In determining the significance of environmental impacts, it is important to consider the following:
  - Beneficial as well as adverse environmental impacts;
  - Actual and potential environmental impacts;
  - The part of the environment that may be affected;
  - Characteristics of the local environment; and
  - Nature of changes to the environment.

- The Glass Recovery Services internal risk assessment procedure <insert reference> should be used in determining whether a potential impact would be significant. This risk assessment process is based around the current process for OH&S purposes. Definitions of the "Likelihood" descriptor are relevant in this case. However, the "Consequences or Impact" descriptors can be re-defined for environmental purposes as follows:

HOW LIKELY IS AN EVENT TO OCCUR?

LIKELIHOOD

Level	Descriptor	Description
A	Almost Certain	The event is expected to occur in most circumstances.
B	Likely	The event will probably occur in most circumstances.
C	Moderate	The event should occur at some time.
D	Unlikely	The event could occur at some time.
E	Rare	The event may occur only in exceptional circumstances.

IF IT DOES, WHAT ARE THE WORST CASE SCENARIO CONSEQUENCES?

CONSEQUENCES OR IMPACT

Level	Descriptor	Description
1	Insignificant	No injuries.
2	Minor	First Aid treatment.
3	Moderate	Medical treatment required.
4	Major	Extensive injuries, loss of product capability.
5	Catastrophic	Death.

Use the information above to find risk level (i.e. Likelihood 'C', Consequence '3', would equal 'S' or Significant Risk.

LEVEL OF RISK

Likelihood Consequence

	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A (almost certain)	S	S	H	H	H
B (likely)	M	S	S	H	H
C (moderate)	L	M	S	H	H
D (unlikely)	L	L	M	S	H
E (rare)	L	L	M	S	S

LEGEND

H = High Risk
S = Significant Risk
M = Moderate Risk
L = Low Risk

NO:	AP1.7	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.7 IDENTIFYING LEGAL & OTHER REQUIREMENTS		

1. PURPOSE

The purpose of this procedure is to set out the process to follow to identify applicable legal and other requirements that relate to your environmental aspects, and determine how these requirements apply to your environmental aspects. The procedure needs to address the development, implementation and maintenance phases of the EMP.

2. RESPONSIBILITIES

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. REFERENCES

- AS/NZS ISO 14001:2004 – Environmental Management Systems – Requirements with guidance for use.
- AS/NZS ISO 14004:2004 – Environmental Management Systems – General guidelines on principles, systems and support techniques.

4. DEFINITIONS

Environment

Environment is defined in ISO14001, 3.6 as: *'Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.'*

Environmental Aspect

An environmental aspect is defined in ISO14001, 3.6 as: *'An element of the organisation's activities, products or services which can interact with the environment.'*
NOTE: A significant environmental aspect has or can have a significant environmental impact.

Environmental Impact

An environmental impact is defined in ISO14001, 3.6 as: *'Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects'.*

Legal Requirements

Conditions essential by law that are imposed on a company's activities, products or services including international, national, state and local government legal requirements, contractual agreements with public authorities, customers.

Other Requirements

Conditions not essential by law that can apply to a company's activities, products or services such as voluntary programs, guidelines, codes of practice, Australian Standards or industry standards.

5. PROCEDURE

Legal and other requirements may require identification under a number of circumstances. Trigger mechanisms include:

- The annual EMP review;
- New or changes to environmental legislation;
- New or changes to a process/operation at the site;
- New contractual arrangements; and
- New voluntary agreements or corporate policy.

The broad legal requirements that may apply, what it applies to and the relevant regulatory authorities are listed in the following table:

Legal Requirement	Applies to	Regulatory Authority
Protection of the Environment Operations Act,1997 & Regulations	• Licensing of scheduled activities. • Environmental Emissions such as air, water, noise & waste. • Pollution Incident Response Management Plans for EPL holders.	NSW EPA for Licensed premises
Waste Avoidance and Resource Recovery Act,1997	Waste	NSW EPA
Environmental Planning and Assessment Act, 1979	Environmental Planning (ie: development applications)	Penrith City Council Department of Planning & Infrastructure
Waste Classification Guidelines	Waste	NSW EPA
Water Management Act, 2000	Water Control Approvals	NSW Office of Water

The Government of New South Wales Legislation home page located at http://www.legislation.nsw.gov.au/ contains NSW legislation in force, both Acts and statutory instruments (regulations etc and environmental planning instruments). These are constantly consolidated and kept up-to-date in the "in-force" database.

Other internet pages that may be of use include:

- NSW EPA website: http://www.epa.nsw.gov.au/
- Penrith City Council website: http://www.penrithcity.nsw.gov.au/
- Standards Australia: http://www.standards.com.au
- NSW Office of Water: http://www.water.nsw.gov.au/

Checklist for identification of legal or other requirements relating to a new or change in process / operation and new or change to legislation.

- Identify the activity / process to be undertaken according to the procedure for identifying aspects and impacts and determining significance. It is important to have a thorough understanding of the process, what it involves and any implications it may have on the environment.

- Determine the legal or other requirements that may apply by considering aspects and potential impacts of the activity and the following:
  - Are there specific contractual clauses which relate to environmental management requirements?
  - Will dangerous goods to be used? If so what classes / quantities / msds would be helpful. Dangerous Goods legislation would apply. Changes to or requirements for a notification to WorkCover may be required.
  - Is development consent required? This can be determined using the POEO Act or by seeking advice of Council or an environmental consultant. If development consent is required, a development application will need to be made and the development will need to comply with relevant planning laws. These can be identified by contacting council or at http://www.penrithcity.nsw.gov.au/ the planning website: http://www.planning.nsw.gov.au/
  - Will the process / activity generate any waste? If so this waste will need to be assessed according to the NSW EPA's Waste Classification Guidelines. What quantity of waste is anticipated? This may require licensing under the POEO Act.
  - Will the process generate or change the quantity or nature of wastewater? Changes to or requirements for a Tradewaste Agreement may be required. Sydney Water can be contacted for advice regarding modifications to the permit.
  - Will the process generate noise emissions? If so, an application for an environmental licence may be required.
  - Will the process generate air emissions? If so, an application for an environmental licence may be required.
  - Will other requirements apply such as new contractual arrangements, voluntary agreements / codes, corporate requirements (ie: new policy, triple bottom line reporting)?
  - Applicable Australian standards / Codes of Practice or Guidelines are likely to be referenced in legislation that applies to the process.

- Further assistance can be obtained by contacting the relevant regulatory authority or seeking advice from an independent environmental consultant.

NO:	AP1.8	DATE:	August 13
PREPARED BY:	Benbow Environmental	ISSUE NO.:	1
SUBJECT:	1.8 INTERNAL ENVIRONMENTAL AUDITS		

1. PURPOSE

The purpose of this procedure is to set out the process relating to internal and external auditing of site operations in relation to the organisations environmental aspects and EMP.

2. RESPONSIBILITIES

- Production Manager
- Environmental Manager
- Staff with specific environmental responsibilities

3. REFERENCES

- AS/NZS ISO 14001:2004 Environmental management systems – requirements with guidance for use.
- AS/NZS ISO 19011:2003 Guidelines for Quality and/or Environmental Management Systems Auditing.

4. DEFINITIONS

Internal Audit

According to AS/NZS ISO 14001: 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 are fulfilled.

5. PROCEDURE

An audit of the EMP shall be conducted on a regular basis. During the first two years of implementation this should be conducted at least quarterly. The objective of the audit shall be to assess site compliance to the Environmental Management Plan. A site-specific checklist could be developed to assist in undertaking the audits. It is recommended that external consultants conduct a review of the audit every 2 years.

Internal environmental systems audits shall be undertaken. The audit shall encompass the assessment of the following:

- Assess the effectiveness of the Environmental Management System as a whole, and the procedures used in the application of the system;
- Review of Monitoring Program results and/or reports for non-conformances, and records of corrective and preventive actions on areas of non-compliance to the Environmental Management Plan. Assessment of the adequacy of these actions;
- Degree of conformance to nominated procedures, and review of complaint register;
- Identification of areas of the system which could be improved, and identifying where possible missing procedures, procedures which require updating, documentation which could be simplified, or other target areas;
- Overall commitment to, and implementation of, the Environmental Management Plan;
- Updates in industry best practice;
- Changes in legislation;
- Annual set of objectives/target; and
- Revisions to objectives/targets due to Regional or Global initiatives by Government.