EQMS Procedure

Environmental Aspects and Impacts
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1.2 Application & Scope

This procedure describes the steps that your organization takes to ensure so far as is reasonably practicable that environmental impacts and health and safety hazards are identified, assessed and controls implemented to eliminate or mitigate the risk as far as is reasonably practicable. Consideration of past activities, current activities and new customer requirements are taken into account.

The Environment & Sustainability Manager and Process Owners actively identify aspects and mitigate impacts associated with their activities with the goal of achieving sustained benefit within that activity. All managers and Process Owners are responsible for:

1. Identifying associated environmental impacts of products, activities and services;
2. Considering the lifecycle perspective with respect to:
   a. Environmental impacts within the supply chain;
   b. Environmental impacts associated with product use;
   c. Environmental impacts of end-of-life treatment and/or disposal;
   d. Consideration of the lifecycle perspective of procured goods and services.
3. Maintaining documented information regarding environmental aspects and significant impacts;
4. Prioritizing issues that could affect intended outcomes:
   a. Enhancement of environmental performance;
   b. Fulfilment of compliance obligations;
   c. Achievement of environmental objectives;
   d. Plus any additional issues that we set for ourselves.

1.3 Environmental Aspects & Impacts Management Process

All business activities are assessed to ensure that any changes to processes and operations do not result in adverse environmental impacts. On occasions where your organization does not have a degree of control or influence over the environmental aspect, details are recorded in the Environmental Aspect & Impact Register for management review.

1.3.1 Context

Environmental aspects are identified by taking into account all business activities to ensure that all resulting impacts that result from our processes, activities and operations are identified and assessed. Where reasonable, both direct and indirect significant impacts are considered for mitigation and are recorded in the Environmental Aspect & Impact Register.

1.3.2 Identification of Aspects

Using the Environmental Aspect & Impact Register the Environment & Sustainability Manager and Process Owner s identify all raw materials, chemicals and utilities that are used as process inputs and all outputs such as products, services and by-products. Outputs are considered as products, the waste produced, levels of recycled materials, quantities of water discharge and air emissions for each process or activity.

Following the identification of environmental aspects, their impacts on the environment are calculated and an impact rating is assigned. All of the organization’s activities are considered when identifying actual and potential environmental aspects and impacts whilst taking account of:
1. Past environmental incidents;
2. Air emissions to atmosphere;
3. Water usage and discharges to surface water groundwater and sewers;
4. Land contamination caused by spillages, etc.;
5. The production, re-use, recycling and disposal of controlled and special wastes;
6. The storage and management of materials;
7. Activities upon local ecology of operations, sites and premises;
8. Environmental noise;
9. Energy use and management;
10. Use of transport and vehicles;
11. Legal issues and other requirements;
12. Raw materials and packaging;
13. Office activities;
14. Landscaping and infrastructure;
15. Other relevant issues such as odors, particulates, lighting & pests.

When identifying inputs and outputs, the Environment & Sustainability Manager considers all modes of operation since start-up, shutdown, or emergency operations might introduce additional environmental aspects and impacts into our processes.

1.3.3 Assessment of Impacts

Once the impacts have been identified they are prioritised in terms of their environmental impact to assist in using them for setting objectives and targets and for identifying operational control procedures. Each aspect identified is assigned a significance rating to indicate the relative importance of its related environmental impact. The significance rating is used to define those impacts which are to be controlled through environmental objectives and targets, or by the implementation of operational control procedures.

The assessment of the severity of an environmental impact drives management attention and supports planning for mitigation. A qualitative risk assessment scheme consisting of qualitative probability and impact scales is undertaken to ensure detailed understanding of the effects of each impact. The Environment & Sustainability Manager will engage with Process Owners to:

- Identify the control measures already applied to each significant impact i.e. existing control measures. These may be pro-active (reducing the probability) or reactive (reducing the impact);
- Rank the probability of each impact occurring, after taking into account the actual effectiveness of the existing control measures;
- Enter the existing control measures and the associated current impact scores;
- Undertake a risk assessment to provide more detailed understanding of the impact’s consequences;
- Set objectives and targets for achieving impact mitigation.

Using the ‘significance determination’ section of the portion of the Environmental Aspect & Impact Register the Environment & Sustainability Manager will evaluate, each identified aspect to determine whether it is significant. The environmental aspects will be considered to be significant if the aspect has an impact on the environment and meets the impact scoring criteria for implementing mitigation, See table S4 below.
Provide the rationale for S or N in the appropriate column. Risk assessments are undertaken to provide an improved understanding of the impact’s profile and to derive a more detailed understanding of certain cost and time risks. Forecast probability, cost and time data is assessed for each impact based on the causes and effects described, taking into account the existing controls and active responses.

1. All aspects which elicit concerns of stakeholders, interested parties and our organization are regarded as significant, if necessary controls have not been implemented;
2. All aspects which are subject to environmental legislation are regarded as significant, and therefore noted as having a high impact/risk, if there is a breach or potential breach of legislation;
3. All aspects where insufficient information is available to make a reasoned judgement are regarded as significant until further information is available.

Probability or likelihood estimations are established giving due consideration to the effectiveness of existing control measures. The consequence evaluation criteria define the consequence criteria, assessed against potential financial loss, reputation impact, health and safety, legal and regulatory compliance and management time and effort.

1.3.4 Impact Rating

An inherent risk rating represents the level of risk in the absence of a controlled environment and is arrived at after measuring the likelihood and the consequence of an event occurring. For each impact that is identified, an evaluation is undertaken to assign a specific score in order to determine the correct level of action.

Impact criticality (Table S1) is calculated by multiplying the likelihood (Table S2) by the consequences of risk (Table S3). The resulting score (Table S4) is then used to prioritise the appropriate level of action.

### Impact Criticality (S1)

<table>
<thead>
<tr>
<th>Likelihood of Occurrence (L)</th>
<th>Consequence Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Catastrophic</td>
</tr>
<tr>
<td>Almost Certain</td>
<td>25</td>
</tr>
<tr>
<td>Likely</td>
<td>20</td>
</tr>
<tr>
<td>Possible</td>
<td>15</td>
</tr>
<tr>
<td>Unlikely</td>
<td>10</td>
</tr>
<tr>
<td>Rare</td>
<td>5</td>
</tr>
</tbody>
</table>

### Likelihood (S2)

<table>
<thead>
<tr>
<th>Score</th>
<th>Likelihood</th>
<th>Description</th>
<th>Percentage</th>
<th>Probability</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rare</td>
<td>May only occur in exceptional circumstances</td>
<td>&lt;0.1%</td>
<td>1 in 1,000</td>
</tr>
<tr>
<td>2</td>
<td>Unlikely</td>
<td>Could occur during a specified time period</td>
<td>1%</td>
<td>1 in 100</td>
</tr>
<tr>
<td>3</td>
<td>Possible</td>
<td>Might occur within a given time period</td>
<td>10%</td>
<td>1 in 10</td>
</tr>
<tr>
<td>4</td>
<td>Likely</td>
<td>Will probably occur in most circumstances</td>
<td>50%</td>
<td>1 in 2</td>
</tr>
<tr>
<td>5</td>
<td>Almost Certain</td>
<td>Expected to occur in most circumstances</td>
<td>&gt;95%</td>
<td>1 in 1</td>
</tr>
</tbody>
</table>

### Consequences (S3)

<table>
<thead>
<tr>
<th>Score</th>
<th>Impact</th>
<th>Environmental Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Negligible</td>
<td>Slight, no potential risk of environmental impact</td>
</tr>
</tbody>
</table>