

Barhale Construction plc

Environmental Policy Manual

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1 Introduction

Purpose

Our primary aim is developing and maintaining a first class environmentally responsible culture within Barhale. This is driven by our goal for **zero** pollution incidents which is a key objective within the business.

Barhale Construction plc remains focussed on developing a positive and proactive environmental culture, not only for our own people, but also for our suppliers and sub-contractors.

Caring for the environment is at the heart of all we do and is one of our eight values. We are not satisfied with mediocrity and we want to achieve our goal of zero incidents.

The purpose of this document is intended to provide information to all Barhale Construction Plc employees on the company's organisation and arrangements for environmental management to ensure our impacts are minimised, and to set out management and employee responsibilities to achieve this.

This document has been prepared to define the way Barhale Construction Plc intends to manage environmental issues and meet the requirements of ISO 14001, which is summarised as follows

- To establish an environmental policy that is appropriate to Barhale.
- To identify the legislative and regulatory requirements relevant to the organisation's environmental compliance.
- To identify the environmental aspects (risks) arising from the company's past, existing or planned activities or services determine the environmental significance of these aspects (risk) and introduce control measures to manage environmental impacts.
- To identify priorities and set appropriate environmental objectives and targets.
- To establish a structure, procedures and programme to implement the policy and achieve the objectives and targets.
- To define responsibilities and provide resources for planning, control, monitoring, corrective action, auditing and review of activities to ensure both that the policy is complied with and that the Environmental Management System remains appropriate.

Environmental policy statement

Barhale Construction plc provides a range of services including civil, structural and process engineering, plant and materials supply and support services to our construction projects.

Much of the work undertaken is delivering projects that are designed to improve the environment. Consequently, during the design, planning, construction and operation of projects, as a responsible organisation, the Board is dedicated to ensuring the company's activities are conducted in a manner that achieves and maintains the highest environmental standards.

The Company is committed to continual improvement in environmental performance through the setting of objectives and targets, with the monitoring of these through our Three Pillars performance indicators to ensure they are achieved.

The environmental policy and environmental management system, which forms part of the integrated management system, will be maintained and regularly reviewed to ensure prevention of pollution, compliance with relevant legislation, meeting our client and community expectations and that activities are controlled to minimise impacts from our significant environmental aspects, which could include:

- Waste
- Releases to water
- Use of resources
- Contamination of land
- Nuisance and amenity
- Emissions to air, including carbon
- Archaeology & local history
- Wildlife.

To emphasise the importance of good environmental practice, Barhale will communicate its policy to its employees and to those who undertake work on its behalf. To ensure the effective management of relevant environmental issues, Barhale are committed to a programme of ongoing training and awareness for its employees and for those working for us.

Barhale will seek to influence, advise and co-operate with clients and other interested parties in achieving sustainable design and construction techniques and will encourage sub-contractors and suppliers to adopt similar practices in order to protect the environment.

The importance of environmental responsibility is demonstrated through the Company's Vision, Mission and Values and its adoption as a pillar in our Three Pillar strategy to become a sustainable business. This policy is one in a series of policies under our Integrated Management System policy that combine to demonstrate our commitment to corporate responsibility.

The Directors will report on Barhale's progress annually.



Peter Dobson
Director of Health, Safety and Environment
February 2010



Dennis Curran
Chairman/Managing Director

Statement of intent

To support our environmental policy and objectives we are committed to responsible business practices in the following environmental areas and as such, are developing programmes and procedures to improve our performance.

Carbon footprint & energy efficiency

Our approach to a reduction in carbon footprint is focussed on our most significant contributions which are transport and site fuel use. Key areas where improvements will need to be made in transport include reducing mileage, increasing fleet efficiency and improving driver behaviour. To tackle fuel use on site we are directing our efforts at plant specification, project design, planning and operational set up.

Sustainable procurement policy

The materials we use during our construction projects contribute to our environmental performance and as such we recognise the contribution sustainable materials make to improved environmental performance. We have already contributed significantly in this area by developing and setting objectives to increase the amount of recycled materials we use, particularly aggregates in excavation reinstatements. We will continue to support initiatives and activities that reduce our use of virgin aggregate as well as seeking to minimise waste materials by setting clear targets to increase the amount that are diverted from landfill, thereby improving our resource efficiency.

We are also committed to improving the way we procure other materials such as concrete, timber, vehicles, fuel, utilities, water and office consumables to ensure they are sourced through responsible organisations that have established processes to validate the materials have demonstrable environmental credentials.

As such we will develop mechanisms to:

- Enhance employee awareness of relevant environmental and social effects of purchases through appropriate training.
- Provide guidance and relevant information to employees to allow them to select sustainable products and services.
- Give preference to products and services that can give value and can be manufactured, used, and disposed of in an environmentally and socially responsible way.
- Work with existing and potential suppliers to investigate and introduce responsible processes and products.
- Ensure that sub-contractors credentials are considered in the Vendor Assessment process.
- Develop sustainability criteria that can be included in specifications to suppliers, including the following
 - Health and Safety
 - Environmental protection
 - Quality management
 - Equality & diversity
 - Ethical sourcing – including human and employee rights, corruption and competition
- Ensure that sustainability criteria are considered in the placing of orders.

2 Planning

Environmental aspects

To mitigate negative environmental risks and promote positive environmental impacts our environmental management system is based on a requirement to identify and evaluate environmental risks and ensure that appropriate controls are implemented. The framework for this process is detailed in CPR 87 Procedure for Risk Assessment and applies to all activities including construction projects, depots and offices.

Corporate environmental risks are placed on Envoy and are reviewed on an annual basis or when new risks are identified by the business. Site management, using corporate risk assessment information, produce site specific risk assessments which identify and control environmental risks arising from business activities.

The Group Environmental Manager and Health, Safety and Environmental Advisors are available to provide advice to operational management and staff during the planning of new or changes to existing activities.

Legal and other requirements

To ensure we remain compliant with environmental legislation and our clients requirements we have established CPR112 - Procedure for the Monitoring and Maintenance of HSE Legislation and other requirements. This procedure ensures relevant requirements are identified through a register of legislation, with changes monitored, communicated and implemented.

To ensure compliance, periodic evaluations will be undertaken and recorded by assessing trends from incidents, Health, Safety and Environmental Advisor inspections, near miss reports, non conformances and investigations carried out by internal auditors.

Legal requirements are incorporated into the risk evaluation process to ensure that those environmental aspects with legislative controls are considered significant.

Objectives and targets

To ensure improvement in our environmental performance we have established a series of environmental objectives, measures and targets which are set annually for the organisation as a whole and our business units. These are monitored on a monthly basis, reported as part of the Three Pillars indicators and reviewed by the Board of Directors.

Barhale environmental corporate objectives and targets set for 2010 are as follows:

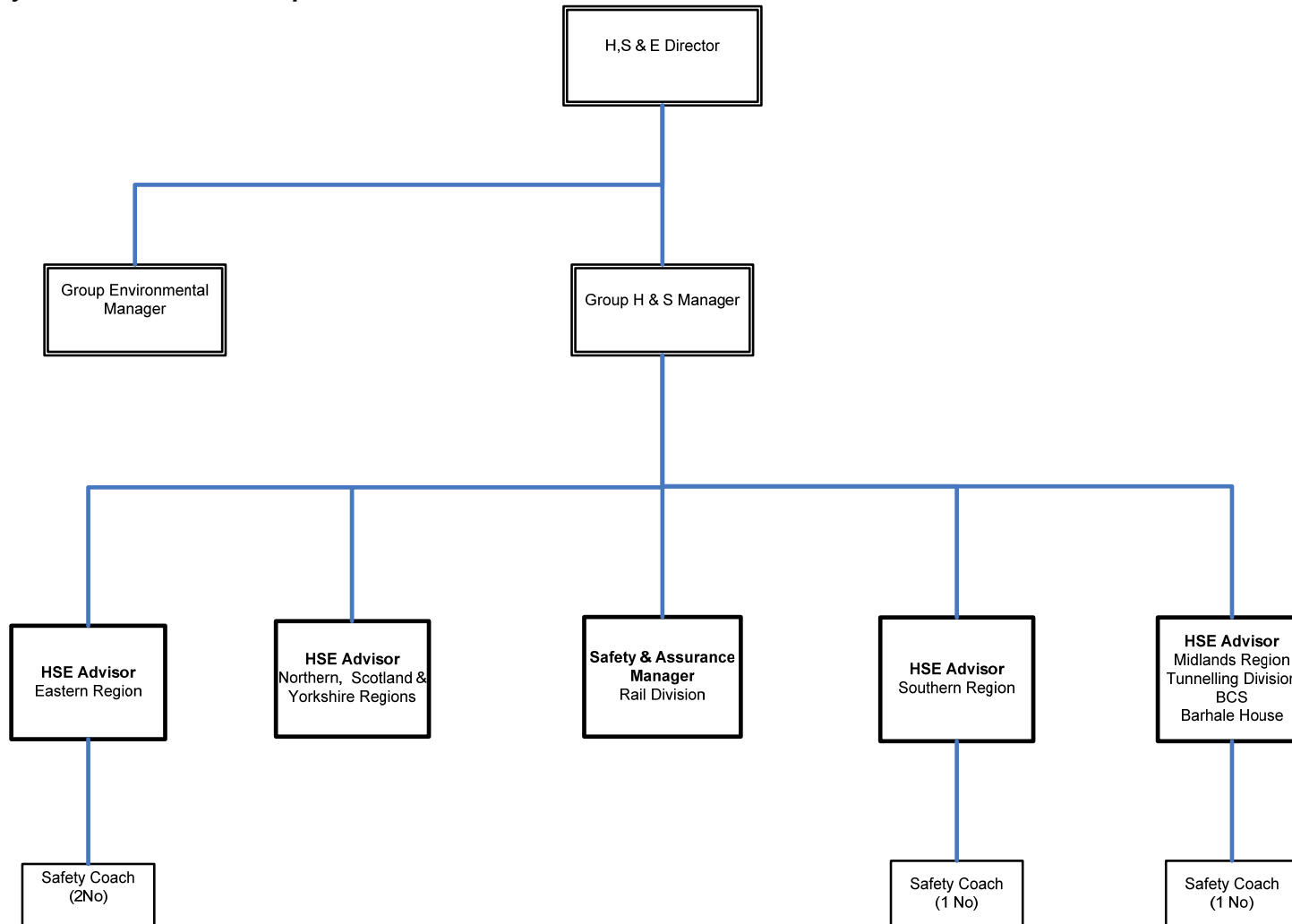
Environmental objectives and targets		
Enabling objective	Measure	Corporate target
Minimise pollution Incidents	No of CAT1 incidents per £m turnover	0
	No of CAT2 incidents per £m turnover	0.02
	No of CAT3 or CAT4 (near misses) incidents per £m turnover	12.5
Reduce our carbon footprint	Monthly fuel use as kg of CO2 generated per £100k t/o	6300
Minimise our impact on the local community	Average score on Considerate Constructors Scheme	34.5
Contribute to profit from environmental initiatives	Revenue from environmental initiatives as % of turnover	0.45
Increase awareness of environmental issues throughout the company	% of delegates who having attended 1 or ½ day environmental awareness courses within 3 years	80
Reduce waste to final disposal	% of waste by volume diverted from landfill	80
Increase use of recycled materials	Recycled aggregates as % of total aggregates purchased (by £)	30

To support the achievement of corporate and business unit environmental objectives construction projects are also required to set objectives.

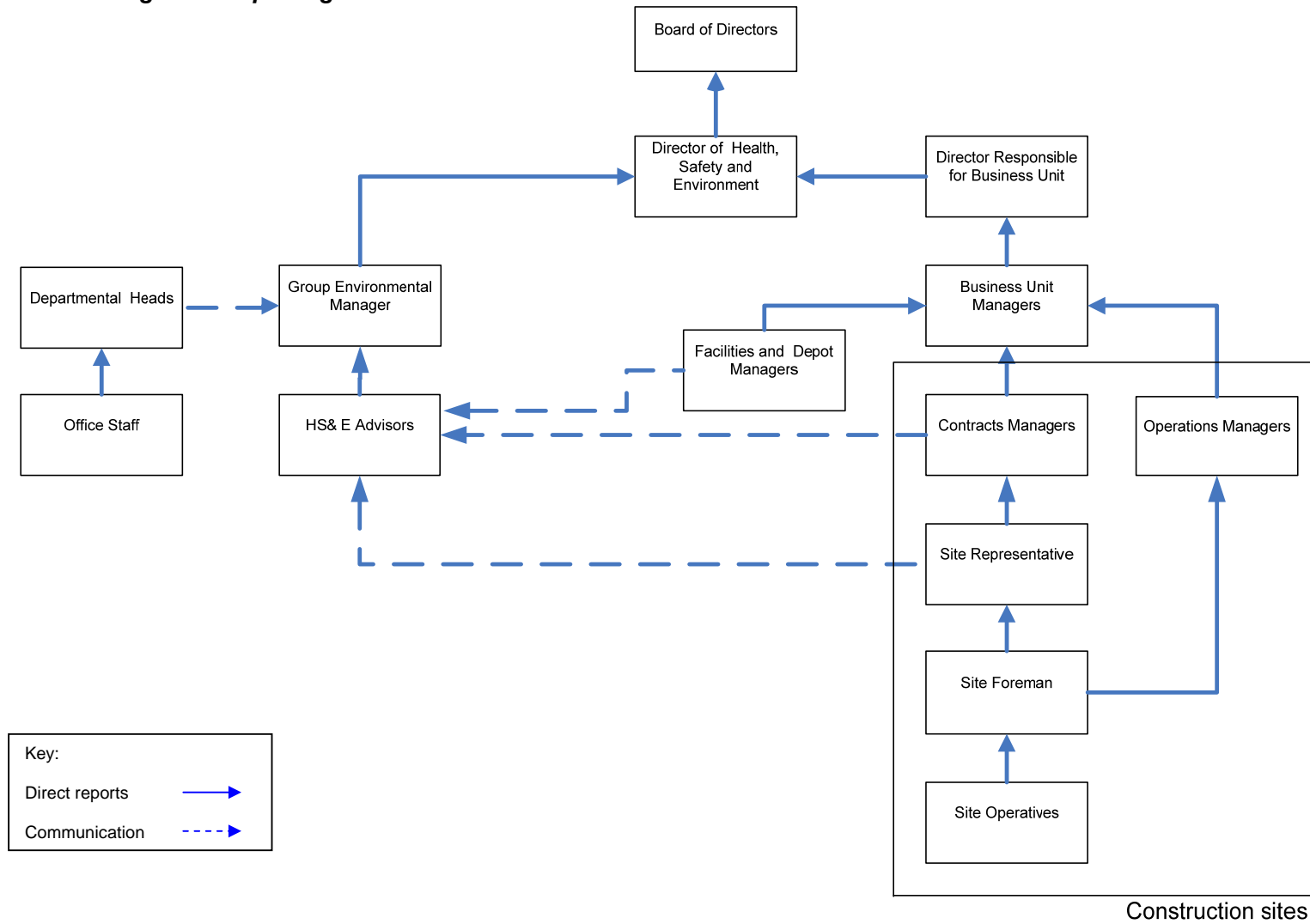
3 Implementation and operation

Organisation

Health, Safety and Environmental Departments' structure



Environmental management reporting structure



Resources, responsibility and authority

Director of Health, Safety and Environment

Reporting to the board of directors, the Director of Health, Safety and Environment has been appointed and is responsible for environmental performance across the company. This appointment does not absolve any of the company directors from their collective or individual responsibilities.

Responsibilities include:

- Ensure that there is an up to date Environmental Policy and that it is brought to the attention of all employees.
- Ensure that the Environmental Management System, as a component of the Integrated Management System, is maintained and regularly reviewed to deliver continual environmental improvements in accordance with ISO14001.
- Ensure there are instructions for the organisation and methods for carrying out the company policy and make sure that each person is aware of their responsibilities and the means by which they can carry them out.
- Institute reporting, investigation and costing of incidents. Promote analysis of investigations to discover root causes and trends to eliminate risks and to ensure the prevention of recurrence.
- Ensure adequate personal knowledge and understanding of environmental matters and arrange training where required.
- Ensure suitable disciplinary measures are conducted on individuals that fail to discharge satisfactorily their responsibilities for environmental protection.
- Ensure that senior management inspections are undertaken.
- Arrange for regular meetings with the Group Environmental Manager to discuss company performance and improvement areas.
- Ensure environmental arrangements and responsibilities have been identified, formulated and implemented by direct reports.
- Review on a regular basis the performance of direct reports and ensuring they discharge their responsibilities.
- Ensure direct reports are aware of their responsibilities and have received appropriate training to fulfil their roles.
- Ensure sufficient resources are available to allow the business to fulfil its environmental obligations.
- Ensure that objectives are set, targets identified and KPIs are monitored in line with the company's integrated management system.
- Ensure that significant environmental risks and performance is reported internally and externally in the company's Corporate Responsibility report on an annual basis.

Business unit managers & departmental heads

As direct reports to directors, business unit managers and departmental heads are responsible for effective environmental management in their regions and departments and staff under their control.

Responsibilities include:

- Ensure Contracts Managers and Line Managers have received adequate environmental training to enable them to fulfil their responsibilities in line with the requirements of this policy and the environmental requirements of the Integrated Management System.
- Regularly reviewing the performance of direct reports and ensuring they discharge their responsibilities.
- Ensure sufficient resources are available to allow the business unit and department to fulfil its statutory environmental obligations.
- Ensure adequate personal knowledge and understanding of environmental matters.
- Ensure that senior management inspections are undertaken.
- Ensure individual responsibilities stated within the Environmental Management System are implemented.
- Ensure suitable processes are in place to induct new employees into the business unit and department.
- Where environmental knowledge and understanding is below an accepted standard ensure appropriate training is put in place.
- Business Unit Managers to ensure regular meetings with Health, Safety and Environmental Advisor to discuss business unit performance and possible improvement areas.
- Business Unit Managers to formally report on a monthly basis to their Directors on environmental performance appertaining to the business unit under their control.
- Report to the Director of Health, Safety and Environment on matters that cannot be resolved.
- Ensure suitable disciplinary measures are conducted on individuals that fail to discharge satisfactorily their environmental responsibilities.

Contracts Managers & Line Managers

Reporting to the Business Unit Managers and Departmental Heads, Contracts Managers and Line Managers are responsible and accountable for the environmental management under their control, and the implementation of policies and procedures to assist department heads to discharge their responsibilities.

Responsibilities include:

- Ensuring staff under their control have received adequate training to enable them to fulfil their responsibilities in line with the requirements of this policy and the environmental element of the Integrated Management System.
- Ensure sufficient resources are available to allow the business to fulfil its statutory environmental obligations.
- Reporting to Business Unit Managers and departmental heads any environmental matters that cannot be resolved.
- Responsible for the implementation and monitoring of agreed control measures within areas of supervision and control, to ensure effective environmental protection.

Group Environmental Manager

Reporting to the Director of Health, Safety and Environment, the Group Environmental Manager responsibilities include:

- Ensure the provision of necessary environmental advice, assistance and training to all areas of the business

- Ensure appropriate competencies, knowledge and understanding of environmental matters is defined throughout the company and arrange formal training as required.
- Assist in the implementation and continual review of the Environmental and Integrated Management System.
- Develop and implement strategies, objectives, policies and procedures.

Health Safety and Environmental Advisors

Reporting to the Director of Health, Safety and Environment and indirectly to their Business Unit Managers, responsibilities include:

- Assist the business units to identify environmental risks and provide support and advice.
- Assist the Group Environmental Manager in designing and developing strategies, policies and procedures.
- Promote and communicate environmental policy and practices to all employees.
- Report to the Group Environmental Manager on environmental matters that cannot be resolved.
- Conducting incident investigations to determine root causes and learning opportunities.
- Monitor and report on environmental performance, incidents and non compliance against the environmental management element of the Integrated Management System.

All Staff and Site Operatives

All employees will be required to:-

- Co-operate with Managers on environmental matters.
- Not interfere with anything provided to protect the environment.
- Report all environmental concerns to an appropriate person.
- Seek further advice from Line Managers, Health Safety and Environmental Advisors or the Group Environmental Manager as required.
- Ensure that environmental issues are properly considered for persons under their direct control.
- Contribute in reducing incidents and waste as an integral part of the business process.

Information, instruction and supervision

Information made available to staff, site personnel, sub contractors and visitors at the workplace will include:-

- Site rules
- Emergency plan and procedures
- Incident reporting contact details and arrangements
- Site organogram showing key personnel and environmental responsibilities
- Site weekly Three Pillar meeting minutes
- Copy of recent environmental audits and inspections
- Recent alerts or briefings
- Near miss trend analysis

In addition to the above, all Barhale employees, sub contractors and visitors will receive an induction as a minimum requirement in accordance with CPR90 Company Health, Safety and Environmental Induction Process. This is modular dependent on the person being inducted. The following types of induction will be delivered:

Module A - Employment induction introducing employees, subcontractors and agency employees to the history and philosophies of the company

Module 1 – General health, safety and environmental induction to employees, subcontractors and agency employees detailing our management systems, policies and procedures

Module 2 – A site specific induction delivered to employees and subcontractors on the hazards, risk and controls in place when working on a particular site.

Module 3 – A visitor induction detailing the important site specific rules required by an infrequent visitor who will be accompanied around work areas.

Information / briefings will be provided to ensure that task specific risk assessments, standard procedures and method statements are delivered to those individuals whose activities may impact on the environment.

Competence and Training

Barhale will ensure that employees possess the appropriate level of competence dependent on their role within the organisation. This will be achieved through a combination of appropriate recruitment, training, selection and development of individuals, backed by advisory support.

The specific training needs of individuals will be identified in the following ways:

- Performance development appraisals for all staff
- Environmental monitoring
- Recommendations arising from audits and inspections.

Managers at all levels are responsible for assessing and meeting the training needs of their staff. The Barhale in-house Training Department, Human Resource and Environmental Department will advise and assist Managers in carrying out these tasks and in compiling formal environmental training programs.

Managers, will seek to ensure that all persons working on behalf of Barhale are sufficiently competent. Appropriate training standards include the following:

Environmental awareness training – 1 day

It is a company requirement that staff involved in the planning and management of construction activities including Contracts Managers, Project Manager, Agents, Engineers, Foremen, Estimators and Internal Auditors attend the company's one-day course in environmental awareness. The scope of the course covers all of Barhale's significant aspects, legislation, operational procedures, Three Pillar objectives, inspection and communications. The competency period for this course is 3 years.

Environmental awareness – site based half day training

It is a company requirement that all non-management staff involved in construction and depot activities and depot operatives attend the company's half-day course in environmental awareness. The competency period for this course is 3 years. The course contents will include waste management, working with water including dewatering and discharges, management of fuel oil and chemicals, contaminated land, noise, spill response and wildlife.

Environmental awareness – office based half day training

It is a requirement that all other employees within Barhale receive a half day environmental awareness course detailing the company's significant aspects and the implications of poor performance on our compliance and reputation. The competency period for this course is 3 years.

The environmental competency requirement for the Group Environmental Manager and Health, Safety and Environmental Advisors is Associate Membership of the Institute of Environmental Management and Assessment (or equivalent).

The training department will ensure a record of all environmental training provided to employees is maintained.

Staff responsible for employing subcontractors to carry out work, will ensure that only those companies who have been assessed as having the appropriate competencies, including environmental training, are engaged to carry out work on behalf of Barhale as part of the vendor assessment process. This applies to subcontractors, designers, consultants and any other specialists. Information associated with competency validation will be included on Envoy in the relevant associated organisations record.

Communication

Barhale will create and sustain an awareness of the importance of environmental issues by the use of written, verbal and visual communication. Various mechanisms exist within Barhale for the communication of all forms of environmental information. These include: -

- Quarterly leadership meetings
- Regional business unit team meetings
- Company electronic management system - Envoy
- Quarterly HSE Matters publication to all employees and external interested parties
- Barhale Health, Safety and Environmental Handbook
- Formal environmental training
- Consultation with environmental specialists
- Communication of environmental alerts, to all Barhale people
- Communication of briefings, bulletins and guidance notes to relevant employees
- Quarterly Barhale news letter to all employees
- Annual Corporate Responsibility and Sustainability report

Managers will ensure that their staff and the workforce are informed, instructed and consulted on the environmental aspects of their day-to-day work. Mechanisms for achieving this will be detailed in specific environmental procedures and may include a combination of the following:-

- Site specific inductions
- Breakfast briefings and/or workplace talks
- Weekly forums held on site and conducted by site management involving site staff and site operatives
- Site rules, including the Cardinal Rules
- Risk assessment and method statement briefings
- Toolbox talks
- Senior management inspections

To promote environmental awareness and minimise risk of environmental offences, all sites are encouraged and incentivised through KPI targets to report environmental near misses on waste, discharges, spills, air emissions, nuisance and wildlife.

Barhale requires all staff to “lead by example” and to emphasise the importance of the environment through their visible behaviour. As one of the Three Pillars, environmental protection must be seen as a business priority alongside safety and profitability.

External communication

To ensure that contact with enforcement authorities relating to site visits and communication via emails, letters or telephone is captured and managed, the company has established CPR254 - Procedure for contacts with Enforcement Authorities. The purpose of recording these contacts is to ensure that any concerns expressed by an enforcing authority, or any actions required, are dealt with in a timely and appropriate manner.

Environmental communication, including complaints, from interested parties relating to construction projects, offices and depots will be recorded in the site file or facilities pack as environmental correspondence.

Operational Control

Our activities are planned and delivered based on a risk assessment process that defines our significant risks at both a corporate and activity specific level. To ensure our significant risks are controlled, documented procedures and guidance have been developed and must be communicated, implemented and audited to ensure they are effective. Our key environmental operational procedures include the following

CPR114 Procedure for Waste Management

CPR115 Procedure for Management of Fuel, Oil and Chemicals

CPR116 Procedure for working with water, trade effluent and sewage

These procedures are supported by our key operational guidance, CG468 Corporate Environmental Risk Register. The register details our significant environmental risks and signposts these to associated controls such as procedures, guidance, legislation and example controls. This allows site-specific risk assessments to be produced based on corporate risks and controls. In addition, to provide further information to site we have adopted CG447 CIRIA Environmental Good Practice on Site (C650) as a formal guidance document. This good practice guide has been developed by leading environmentalist in the construction industry and thereby represents the company's code of good practice.

Emergency preparedness and response

All sites and depots are required through CPR113 Procedure for Emergency and Response to prepare an emergency plan (CF99) detailing potential emergencies, site responsibilities, emergency contacts and a site layout plan identifying the location of potential causes of environmental emergencies (e.g. hazardous waste and fuel storage areas) and sensitive areas to be protected in the event of an incident e.g. drains, watercourse, areas of ecological importance. The plan will be communicated at site inductions and displayed on notice boards.

CPR117 Procedure for Spill Response and Spill kit Requirements has been specifically produced detailing the mandatory requirements for spill kits when fuel or oil is stored above specified quantities and the process for responding in the event of a fuel or chemical spill.

Incident reporting

Where an environmental incident occurs it will be handled as per the company procedure CPR97, Procedure For Reporting And Investigation Of Incidents And Analysis Of Trends And Causes. Contact must be made as soon as possible with the client/Director/Business Unit Manager/Group Environmental Manager to determine appropriate course of action. Where necessary contact will be made with the relevant regulator to report any incident.

Where potable water is contaminated and where natural springs provide drinking water, the local water company will be contacted immediately, and the incident reported.

Documentation and records

Full details of the documentation required to maintain the environmental management system and the operational controls to ensure good environmental performance are set out in systems procedures, operational procedures and formal guidance. These are described in detail in appendix 1, Environmental Management System documentation.

A fundamentally important document to ensure that operational controls are planned and implemented on all CDM construction projects is the Project Plan, as required by CPR46 Management of Health & Safety and Environment in construction. Where projects fall below CDM thresholds, controls will be implemented through risk assessments and method statements.

Environmental records

For construction projects a site environmental file is maintained for the purpose of retaining hard copies of all relevant documents and information. Similarly, for all offices and depots a facilities pack is maintained. The site environmental file and facilities pack contains the following information where relevant:

- Aspects and impacts
 - Aspect assessment/Environmental Risk task worksheet
- Waste management records
 - Site waste management plan records
 - Waste transfer/consignment notes
 - Waste carriers registration certificates
 - Permits/exemptions
- Water management records
 - Permit to work with groundwater trade effluent and over pumping (permit to pump)
 - Discharge / abstraction consents (evidence of duty of care)
 - Discharge records
- Miscellaneous environmental records
 - Contractor method statements/environmental management plans
 - Other consents
 - Other environmental information supplied
- Environmental correspondence

Integrated management systems documents

This policy defines the environmental management system component of the Integrated Management System. Corresponding documents detailing the Quality Management System and Health and Safety Management system are documented as follows:

- Quality - CPR1 - Integrated management systems manual
- Safety – PL2 - Health and Safety Policy

Document control

All environmental policies, procedures, guidance, information and forms are controlled as per CPR2 Control of company/ management system documentation. The Director of Health Safety and Environment is the authorised owner of all environmental policies and procedures. The Group Environmental Manager is the authorised owner of all guidance, information, forms and legal records.

4 Checking

Monitoring

A variety of monitoring techniques are used within Barhale to measure environmental performance.

Internal audit, surveillance and non conformances

Internal IMS audits shall be conducted by internal auditors allocated by the IMST Quality department. The scope of internal audit programmes and audits will include the company's environmental procedures and guidance. This shall be done in line with CPR4 - Audit and system surveillance procedure. Environmental non conformances raised during internal audits shall be evaluated monthly to identify corporate corrective and preventative actions. These will be reported monthly to the Operations Board.

Senior management inspections

All Senior Managers are tasked with completing health, safety and environmental inspections on a monthly basis in areas of the business under their control. The term Senior Manager includes the role of Contracts Managers, Business Unit Managers and Directors. Inspections will be carried out on site and numbers of inspections completed will be corporately monitored on a monthly basis as part of the corporate environmental measures set by the business.

The inspections are linked to the corporate cardinal rules which contain the following environmental rules, as follows:

Barhale cardinal rules (environmental)

The rules outlined below are considered to be **mandatory** on all Barhale sites unless, due to specific circumstances, a documented risk assessment has shown it to be inappropriate and alternative, effective control measures are in place. Documented evidence must be available to demonstrate control conformance to the identified rules

No work activity with significant risks to health, safety or the environment should commence until a **risk assessment** has been undertaken and the appropriate control measures are in place.

- **Waste** will be managed in accordance with the Duty of Care Regulations and other relevant legislation. Waste carriers will be engaged in accordance with Barhale vendor controls and will be appropriately licensed and registered to handle our waste.
- All **fuel and chemicals** shall be stored in accordance with current legislation. Appropriate spill control equipment must be available at all times.
- Water and effluent shall be managed to avoid unauthorised or uncontrolled **abstraction and discharge**.

Health, safety & environment department audits

All operational sites will be audited by a Health, Safety and Environmental Advisor to determine site compliance with the health, safety and environmental management system requirements and the general level of performance on site. All audits are scored and logged and reported to the board on a monthly basis. Any audit scores falling below a threshold of 65% will require attendance by the relevant Contractors Manager and Site Agent to an executive meeting held on a weekly basis, in order to explain the findings of the audit and determine action taken to rectify the situation.

Weekly site managers inspections

It is an Environmental Management System requirement that all Site Managers conduct a weekly inspection on their own site and record their findings accordingly. Close-out of findings will be checked during the Health, Safety and Environmental Advisor audit as above.

Near miss reports

Environmental near misses and minor incidents relating to waste, discharges, spills, air emissions, nuisance, wildlife and archaeology are identified and reported through business unit and to the Group Environmental Manager. These reports are assessed for significance and statistical information collated to assist in the evaluation of compliance and future company environmental controls.

Environmental impacts

Where relevant sites and depots may be monitored for environmental impacts, obligatory monitoring is required for all waste streams which must be reported through to the Health Safety and Environmental Advisor for company KPI requirements. Other monitoring may be required including

- Water parameters where specified by a discharge or abstraction consent
- Noise levels where required by the local environmental health department
- Complaints received

5 Management reviews

To ensure that environmental management within the organisation is appropriate and effective at controlling significant risks and delivering environmental performance improvements at both the corporate and business unit levels, management reviews shall be scheduled and carried out in accordance with CPR3 - Procedure For Management Review of Integrated Management Systems.

6 Appendix

[Link to CG4077 Environmental Management System Documentation](#)