

DOCUMENT NO: 202.001

Date : 1st October 2010

ENVIRONMENTAL POLICY

CDB Consulting Engineers Limited (CDB) operates a Compliance Management System which combines the Health, Quality, Safety and Environmental disciplines into an integrated management system.

Reference should be made to the Compliance Company Safety Policy which is the ruling document and included in CDB-100.001 – Compliance.

The requirements of ISO 14001 have been included as far as practically possible within the Compliance Policy document.

CDB recognise its obligations as an employer and will publicise information in response to public concern.



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1. RESPONSIBILITIES

1.1 Introduction

This document has been formatted to comply and work towards ISO 9001.

Roles and Responsibilities with more detail have been included within Section 2.3 – Implementation and Operation.

2. MANAGEMENT SYSTEM

2.1 General

2.2.1 The Environmental Management System comprises of the Compliance Policy, this Environment Policy Document and supporting procedures and method statements. The system forms an integral part of the existing Company Management System

2.1.2 The intent of the Environmental Management System is to minimise environmental effects, reduce pollution, waste and conserve resources by:

- Setting specific objectives throughout the company
- Encouraging efficient and environmentally friendly working systems
- Developing an awareness of environmental matters throughout the workforce
- Using and promoting the use of energy efficient, recyclable, environmentally friendly materials
- Giving consideration to the environmental policies of prospective suppliers
- Having emergency plans in place to deal with any uncontrolled event.

2.2 Planning

2.2.1 Environmental Aspects

2.2.1.1 Those environmental aspects which are considered significant and require management attention shall be compiled into a register, which will identify the risk potential, legal implications and control measures of the aspects.


2.2.1.2 Reviews shall be conducted demonstrating that environmental aspects have been evaluated and particular significant aspects will be identified against which improvement programmes shall be established. These shall be conducted in conjunction with Compliance Management, General Management and others, as deemed necessary.

2.2.1.3 Contract Review should include an assessment of all potential Environmental Aspects. These should be considered against the existing Company Aspects Register. Any new aspects should be added to the Company Register and included in the Project HS&E plans.

2.2.2 Legal and Other Requirements

2.2.2.1 CDB intend to subscribe to institutions that provide information and updates regarding legislation and other requirements.

2.2.2.2 National or Local Laws and regulations are to be reviewed in relation to particular areas of operation and where considered significant incorporated within the aspects register.



2.2.3 Objectives and Targets

2.2.3.1 Objectives and Targets are set at the Annual Review meetings and Management Performance indicators (MPI's) and Operational Performance Indicators (OPI's) will be established eventually to demonstrate compliance and the commitment to continuing improvement in the areas of.

- significant aspects
- legislation
- prevention of pollution

2.2.4 Environmental Management Programme

2.2.4.1 CDB will establish eventually and maintain a programme for achieving its objectives and targets at the main facilities. The programme shall include:

- Designation of responsibility for achievement of the objectives and targets
- The means and time frame by which they are achieved

2.2.4.2 Design of Products

- Relevant legislation is complied with
- The environmental targets set by the client are achieved
- Environmental impact assessments are conducted where this is a contractual requirement
- Where no specific environmental targets are set by relevant legislation or contract, design criteria will be agreed with the client
- Where no specific environmental targets are set by relevant legislation or contract, products and materials selection will be agreed with the client with regard to environmental impacting their intended use and ultimate disposal.

2.3 Implementation and Operation

2.3.1 Roles and Responsibilities


2.3.1.1 Corporate Management.

The roles and responsibility of the Corporate Management are defined in the CDB-100.001 Compliance Policy Document

The Managing Director has signed the Compliance Safety Policy Statement and has committed to provide human and financial resources to satisfy the requirement of that Compliance Policy, Management Systems and needs of the business.

2.3.1.2 Compliance Manager

The Compliance Manager is responsible to the Managing Director (MD) for overall policies and objectives regarding Quality, Health, Safety and Environmental matters and is specifically responsible for the



establishment, continuing development and improvement of the overall Environmental Management System.

The Compliance Manager reports to Senior Management on the performance of the Environmental Management System.

2.3.1.3 Project Managers

Project Managers, supported by their Project Teams, are responsible for reviewing contracts and/or designs and development of project control documentation, e.g. Environmental Compliance Plans, and Environmental, Health and Safety Plans.

They are also responsible for ensuring that the activities for which they are responsible are carried out in accordance with the appropriate legislation and CDB policies.

2.3.1.4 Safety Advisor

The Safety Advisor is responsible to the Compliance Manager for providing specialist advice and assistance for the effective operation of the Environmental Management System. The Safety Advisor will provide an induction to new starters which will address the company's overall and local approach to environmental matters.

2.3.1.5 Supervisory Personnel

Supervisory Personnel are responsible for ensuring that their staff are aware of, familiar with, and apply the procedures relevant to their area of work such that the work is carried out in accordance with the requirements. They are responsible for encouraging efficient and environmentally friendly working systems and for promoting environmental awareness.

2.3.1.8 The Individual


Each person is responsible for compliance with environmental procedures and should work and act in accordance with the relevant procedures and instructions.

2.3.2 Training, Awareness and Compliance

2.3.2.1 All personnel will be made aware of the company's overall and local approach to environmental matters by means of inductions and presentations. Items to be addressed include:

- the importance of conformance with the procedures and management system
- the actual and potential significant environmental impacts of their activities
- their roles in achieving conformance with the policy and procedures
- emergency preparedness and response requirements
- the environmental benefits of improved personal performance
- the potential consequences of departure from specified operating procedures.

2.3.2.2 As appropriate, personnel will be trained to conduct their activities with due care for the environment and in accordance with the requirements of the Environmental Management System. All functions that require acquired skills and could be adversely affected by the lack of such skills shall be identified, and actions taken to remedy the situation. Personnel performing such specific, assigned tasks shall be qualified on the basis of appropriate education, training and/or experience as required.



2.3.2.3 Each Manager, in conjunction with the Compliance Manager shall identify the qualifications required and/or training needs of personnel within his control. Personnel records, incorporating training, shall be held and controlled by the Personnel Department.

2.3.3 Communication

2.3.3.1 Information on Environmental performance, aspects, complaints and other relevant topics is communication internally by means of:

- Minutes of Meeting
- News Bulletins
- E-mail
- Presentations
- Procedures
- Committees
- Notice Board

2.3.3.2. All correspondence with third parties (internal or external) regarding environmental aspects and management will be signed by the General Manager of the relevant facility, or by the Compliance Manager with a copy in the Compliance Department files.

2.3.3.2 A system will be developed at each business unit for recording communications from third parties where the communication has regard to the Company's environmental effect or management. The system will include for investigations to be undertaken and the original communicant to be advised of progress, especially when the communication is by way of complaint.

2.3.4 Environmental Management Systems (EMS) Documentation

2.3.4.1 CDB has in-place a Management System working towards accreditation to ISO 9001.

The EMS has been designed to complement ISO 9001 and BS 8800. The EMS documentation is comprised of:


- A series of Company Procedures
- Schedules relative to aspects and evaluations
- Site plans
- Resource utilisation data
- Organisation charts

2.3.5 Document Control

2.3.5.1 Documents relative to the EMS are produced, distributed, maintained and revised in accordance with the existing management system.

Current versions are maintained in paper copy and are preferably available in electronic format on our electronic databases.

2.3.5.2 Obsolete documents are removed from circulation.



2.3.6 Operational Control

2.3.6.1 General

Production and associated activities will be planned and undertaken so as to meet the requirements of relevant legislation, bylaws and planning permissions. Where activities may impinge upon the identified significant environmental aspects, controls will be determined and applied to ensure that conformance is achieved.

The Compliance Manager shall ensure that control, verification, measurement and the testing of environmental impacts are adequately co-ordinated and effectively performed.

2.3.6.2 Control

Documented work instructions will be produced to control the Company's operations, including maintenance of equipment, where these are directly or indirectly, environmentally sensitive or have the potential to significantly affect the environment. Where possible, such instruction will be incorporated into existing documents.

Specific controls will be detailed for the disposal of waste materials. These controls will incorporate the use of registered contractors who have been approved by CDB, and the retention of appropriate records.

Procurement and subcontract documents will include the CDB requirements for environmental management. Where a supplier is involved in activities at, or is supplying equipment for use at CDB premises or locations controlled by CDB, the supplier will be advised of the existence of any relevant environmental aspects, procedures, local bylaws and planning permissions at the appropriate site. Where the supplier is to be involved in activities at CDB controlled locations, that supplier shall comply with the requirements of an appropriate environmental management system and shall be required to advise CDB of any environmentally-sensitive activities or materials that will be used.

Monitoring and control of relevant process characteristics will be performed on items as determined during the evaluation of current and potential environmental aspects as being a source of possible excess usage. These items should include energy consumption, mains water usage and waste and prevent of pollution.


2.3.7 Emergency Preparedness and Response

2.3.7.1 Procedures are in place to cater for emergency preparedness and response. The procedures identify the person who is delegated responsibility to:

- Take control of the emergency situation
- Contact the emergency services
- Contact management personnel who should be made aware
- Deal with the media
- Contact clients
- Relevant interested parties
- Conduct the investigation to identify root causes to prevent recurrent.

2.4 Checking and Correcting Action

2.4.1 Monitoring and Measurement



2.4.1.1 Systems and procedures are established to monitor and measure the key characteristics of the company's operations and activities.

This includes the recording of information to track performance against objectives and goals, and compliance with legislation and local requirements. Equipment used for these purposes shall be controlled in line with company calibration procedures.

2.5 Non-conformance and Corrective and Preventative Action

2.5.1 In the event that non-conformances with specific requirements are identified, then personnel raise a non-conformance report (NCR) in accordance with the requirements of the compliance system. The recipient of the NCR will:

- Determine the cause
- Draw up a plan of action
- Initiate corrective actions to a level corresponding to the risks encountered
- Apply controls to prevent recurrence
- Arrange for any changes to procedures resulting from corrective and preventive action.

The Compliance Department shall record all non-conformances raised and shall verify and document their close out.

2.6 Records

2.6.1 Records demonstrating the achievement of the required environmental objectives and the effective operation of the Environmental Management System shall be maintained.

2.6.2 With the exception of training records and waste transfer information, a copy of all environmental management records shall be maintained by the Compliance Department. These records shall be legible, dated and identifiable to a particular scope where applicable. They shall be collated, compiled, indexed and filled in a manner suitable to being readily retrievable.

2.6.3 Records shall be established to demonstrate that due consideration has been given to the environmental policies of prospective suppliers. Where suppliers' activities involve work taking place on CDB property or at locations controlled by CDB, records shall be maintained to demonstrate compliance with appropriate EMS.

2.6.4 Storage of the environmental records shall be such as to minimise the possible loss, deterioration or damage. They shall be retained for a minimum of 6 years unless otherwise required by individual contracts or local legislation.

2.6.5 Records to be maintained include, but are not limited to:

- Management reviews (minutes of meetings)
- Aspects register
- Complaints
- Significant aspects register and evaluation records
- Environmental management programmes
- Verification and monitoring results
- Audit reports
- Corrective action requests
- Non-compliance reports
- Information on relevant suppliers' environmental management systems.



2.7 Environmental Management System Audits

2.7.1 The Compliance Manager shall establish, document and implement a schedule of environmental audits. These audits shall include an evaluation of:

- Whether or not the environmental management activities conform to the EMS and are implemented and maintained effectively.
- The effectiveness of the EMS in fulfilling the company environmental policy, philosophy and requirements of working towards ISO 14001.
- Management structure, systems and corporate functions.

2.7.2 Audits shall be carried out by personnel nominated by the Compliance Manager who are appropriately experienced/trained but who are not directly responsible for the area being audited. Audits shall be performed in accordance with documented audit procedures and/or check lists which identify essential characteristics.

2.7.3 The results of the audits shall be documented and brought to the attention of the personnel having responsibility in the area audited.

2.7.4 Management and/or department heads responsible for the area audited shall review, agree and correct deficiencies revealed in the documented audit results.

2.7.5 All actions taken to correct deficiencies shall be reviewed by the Compliance Department to verify compliance, and close out of the action shall be documented.

2.7.6 An analysis of the results of audits is to be available for discussion at the Management Review.

2.8 Management Reviews

2.8.1 An Environmental Management Review will be undertaken annually by a review committee which includes the Compliance Manager and General Managers.

2.8.2 The review will include:

- An assessment of the suitability and effectiveness of the EMS
- An assessment of the applicability of the company environmental policy
- An assessment of the business unit's compliance with existing legislation, regulations and locally imposed requirements and an assessment of the effects of new legislation
- An assessment of the results of environmental management audits
- An assessment of accidental discharges and the need for preventive action
- An assessment of the usage of natural resources and waste production
- An assessment of the results of agreed targets
- An assessment of environmental records regarding non-compliance and close out and the need for preventive action
- An assessment of correspondence received regarding environmental matters and the actions resulting there from and the need for preventive action
- The establishment of new targets

3. BUSINESS PROCESS

3.1 The CDB Environmental business process is based on the model included in ISO 14001.

