

Department	Environmental, Health and Safety	Document no	EHS-050		
Title	Environmental Management System Plan				
Prepared by:		Date:		Supersedes:	
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1.0 AFFECTED PARTIES

All Environment, Health and Safety personnel

2.0 PURPOSE

This SOP details the [Environmental Management System](#) (EMS) that ensures the GMP plant complies with the inhouse Environmental Guidelines and local, state and national government regulatory requirements and has an ongoing improvement plan for environmental performance.

3.0 SCOPE

This procedure applies to all activities, products or services provided by the GMP facility. It defines the policies and regulations which apply to the site and the Environmental Management System in place to ensure compliance.

4.0 RESPONSIBILITY \ BUSINESS RULES

The EHS Manager is responsible for developing and maintaining the environmental management system.

All operational colleagues are responsible for the implementation of environmental procedures and commitment to continual improvement.

The EMS Plan shall be reviewed at least on a two yearly basis. If deemed appropriate it can be reviewed more frequently as necessary to reflect any significant changes.

5.0 PROCEDURE

The site will implement and maintain programs to assure that it:

- Designs, constructs, operates, maintains and manages its operations with 'due diligence' to prevent environmental incidents and unacceptable risk to human health;
- Complies with all applicable governmental and internal EHS requirements;
- Makes a continuous improvement in the areas of waste minimisation, incident and pollution prevention, hazard control, conservation, and environmental preservation and promotion;
- Monitors, evaluates and reports to senior management on a periodic basis the status of EHS programs;
- Develops an EHS Management System to meet regulatory and policy requirements;
- Documents the EHS Management System in standard procedures as required;
- Evaluates the effectiveness of the EHS Management System annually;
- Encourages the participation of all colleagues in EHS programs and activities. A training matrix will be developed and maintained to identify training needs;

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- Designation of the responsibility for achieving objectives and targets at each relevant function and level of the organization; and
- The means and timeframe by which they are to be achieved.

The procedure includes provisions for the review of new and/or modified activities and products to ensure they are taken into consideration in establishing and/or modifying management programs.

Environmental management programs are developed from the objectives and targets and are outlined in the Strategic Plan.

5.3 Implementation and Operation

5.3.1 Structure and Responsibility

The roles, responsibilities and authorities of colleagues are defined in the procedures, job instructions, and position job descriptions. Management colleagues are responsible for providing resources within their functional areas essential to the implementation and control of the EMS. These resources include human resources, specialised skills, technology and financial resources.

The EHS Manager as the EMS management representative has responsibility and authority for:

- Ensuring that the EMS requirements are established, implemented, and maintained in accordance with this policy document.
- Reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the EMS.

The relationship between environmental responsibility and individual performance shall be reviewed periodically through the reward and recognition program and performance review process.

On review of the aspects register, the colleagues who manage, perform or verify work affecting the environment will be identified. The responsibilities and accountabilities for those colleagues shall be defined and documented in standard procedure such as "EHS Roles and Responsibilities".

5.3.2 Training, Awareness and Competence

Procedures are maintained for identifying training needs. All colleagues whose work may create a significant impact upon the environment shall be identified through the aspects review. Colleagues will receive appropriate training and periodic training will be scheduled through the approved training system.

New colleagues in the production building will receive environmental induction training. Training sessions are designed to make colleagues at each relevant function and level aware of:

- The importance of conformance with the environmental policy, procedures and the requirements of the EMS;
- The significant environmental impacts, actual or potential of their work activities, and the environmental benefits of improved personal performance;
- Their roles and responsibilities in achieving conformance with the environmental policy, procedures and requirements of the EMS including emergency preparedness and response requirements; and

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- The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the system are performed.
- Obsolete documents are promptly removed from all points of issue and points of use.
- Obsolete documents retained for legal and/or knowledge preservation purposes are identified.

Documentation is maintained such that it is legible, dated (with dates of revision) and readily identifiable. It is maintained in an orderly manner with retention period specified.

Procedures are maintained defining responsibilities for and methods of, creation and modification of all documents within the system.

5.3.6 Operational Control

It is the responsibility of the EHS Manager to maintain procedures to identify operations and activities associated with the identified significant environmental aspects. These activities, including maintenance, shall be planned to ensure they are carried out under specified conditions. Documented procedures shall be maintained to cover applicable activities as listed below. Documented procedures exist for communicating relevant procedures and requirements to suppliers and contractors.

5.3.6.1 Control Procedure

On completion of the annual aspects register review any significant environmental aspects with identified control needs shall be documented. The EHS Manager is responsible for preparing lists of critical functions and processes associated with the significant environmental aspects and reviewing the effectiveness of the controls and procedures.

The existence of procedures shall be verified and any void that is identified will result in initiating development of the appropriate procedure. These procedures include operating criteria as appropriate. An EHS colleague will review this list. Changes shall be communicated to colleagues, contractors and suppliers who are involved. This communication shall be documented.

5.3.7 Emergency Preparedness and Response

Procedures are maintained for identifying the potential for and responding to accidents and emergency situations and for preventing and mitigating the associated environmental impacts. The EHS Manager and Engineering Manager are responsible for identifying the need for response plans associated with environmental aspects or impacts.

Emergency preparedness and response procedures shall be reviewed and revised after the occurrence of accidents or emergency situations and as deemed necessary by the EHS Manager.

5.4 Checking and Corrective Action

5.4.1 Monitoring and Measurement

Documented procedures are maintained to regularly monitor and measure the key characteristics of operations and activities that can have a significant impact on the environment. These procedures include provisions for recording information to track performance, relevant operational controls and conformance with established objectives and targets.

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5.6.2.2 Trend of findings?

5.6.2.3 **Corrective and preventative action** to be implemented

5.6.2.4 Effectiveness of corrective and preventative action

5.6.3 An evaluation of the effectiveness of the EMS. This feedback will detail

5.6.3.1 Verify some procedures and look for evidence of the procedures being followed.

5.6.4 An evaluation of the suitability of the EMS in relation to:

5.6.4.1 Changing legislation.

5.6.4.2 Changing expectations and requirements of interested parties.

5.6.4.3 Changes in products or activities of the organization.

5.6.4.4 Advances in science and technology.

5.6.4.5 Lessons learned from environmental incidents.

5.6.4.6 Market preferences.

5.6.4.7 Reporting and communication.

5.6.5 External Considerations; This feedback will detail

5.6.5.1 A request for suggestions and feedback to be sent out to all colleagues for review.

5.6.5.2 External communications with governing bodies such as EPA, Sydney Water and Corporate assessments should be reviewed.

The review shall be documented and filed in the EHS files. Improvements will be managed through the corrective action process as per Section 5.4.2.

The review results will be communicated to all colleagues via an information session, team brief or article.

6.0 DEFINITIONS / ACRONYMS

EHS Environmental Health and Safety EMS (Environmental Management System)

7.0 SUMMARY OF CHANGES

Version #	Revision History
EHS-050	New