
ENVIRONMENTAL MANAGEMENT PLAN



Approvals

The signatures below certify that this procedure has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

Company Proprietary Information

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Environmental Management Plan

1. Introduction & Purpose

- 1.1 This Environmental Management Plan defines the management by AEFM of the Environmental Sustainability issues associated with any works that the company conducts.
- 1.2 The EMP is part of AEFM’s Environmental Management System which fulfils the requirements of 14001:2015.
- 1.3 AEFM and its suppliers will comply with the requirements of the EMS.

2. References

Standard	Title & Description	Clause
ISO 9001:2015	Quality management components	4.2.3
ISO 14001:2015	Environmental management components	
ISO 45001:2018	Health & Safety management components	

3. Terms & Definitions

Term	Definition
EMP	Environmental Management Plan
AEFM	AE Facilities Management Limited
EMS	Environmental Management System

4. Application & Scope

- 4.1 The scope of the EMP applies to and covers all works.
- 4.2 The plan defines the EMS and establishes the arrangements to manage and mitigate the environmental risks and impacts from any of our operations.
- 4.3 All subcontractors involved in these works are expected to demonstrate their approach to environmental risk management.
- 4.4 The minimum expectations detailed within this plan are applicable to directly employed AEFM personnel and all subcontractors and suppliers working on behalf of AEFM.
- 4.5 All personnel, subcontractors and suppliers must ensure that they are aware of their duties under relevant legislation. They must make themselves and their employees familiar with the content of this plan and work within the management system defined herein.
- 4.6 This EMP is a live document and will be reviewed and updated on an annual basis and in response to any significant changes.

5. Standards

- 5.1 In addition the standards listed below will be used to set out the requirements:-
 - ISO 9001:2015 Quality Management System
 - ISO 14001:2015 Environmental Management System

6. Management System

- 6.1** This EMP describes the core elements of the Environmental Management System (EMS) that covers AEFM activities and sets out the organisation and arrangements by which the company intends to fulfil its duties in accordance with the requirements and all relevant Environmental Legislation.
- 6.2** Subcontractors will be required to operate their own EMS certified to ISO 14001:2015 suitable for their specific activities and equivalent to AEFM EMS to meet all the company's requirements. SME's may provide valid evidence that they have an Environmental Management System structured in compliance with ISO14001 Environmental management systems.

7. Roles and Responsibilities

- 7.1** Everyone in AEFM has a responsibility for implementing and adhering to the principles of the Environmental Policies of the company in order to effectively carry out their role.
- 7.2** The Director is responsible for assigning appropriate roles and responsibilities within the management team. They must adequately reflect the significant environmental risks and opportunities that have been identified to ensure that legal compliance obligations can be met.
- 7.3** The roles and responsibilities that are critical to the delivery of the environmental management requirements of AEFM are summarised below.

Director

- Provide leadership and commitment to communicate and support the delivery of the company's environmental and sustainability visions.
- Responsible for the environmental performance of the company and encourage others to improve the effectiveness of our EMS and performance
- Sets the company's behavioural culture for sustainability, ensuring that all aspects of our EMP are embraced by our team, including our supply chain partners.

HSEQ Manager

- Provide resources to develop and implement the EMS.
- Has overall accountability for the implementation of this plan and regular audits to provide assurance that it is correctly deployed
- Develop the EMS and relevant documentation
- Maintenance of the 14001:2015 including auditing of the system, incident management and reporting.
- Owns the EMP and associated plans and is responsible for their effective implementation.
- Aids the Director in promoting a positive environmental culture.

Site Staff

- Attend any inductions prior to commencing work where details of the site environmental rules will be provided.
- Working considerably with a good working ethic to minimise adverse environmental impacts.
- Reporting near misses, positive interventions and all incidents to their supervisor.

8. Objectives and Targets

8.1 Our environmental objectives, targets and key performance indicators (KPIs) action planner aligns with the ISO 14001:2015's clauses 6.2.1 and 6.2.2. This section:

- Establishes environmental objectives at relevant functions and levels, ensuring compatibility with strategic direction and consistency with commitments made in the environmental policy, including the commitment to continual improvement
- Takes into account AEFM's significant environmental aspects and compliance obligations
- Considers risks and opportunities
- Ensures environmental objectives are measurable (where practicable) and monitored via establishment environmental indicators

8.2 Objective Setting

The Director and the Operations Manager in conjunction with relevant stakeholders and interested parties prepared the Aspects and Impacts Register, Compliance Register and Interested Parties Log.

9. Environmental Aspects and Impacts

9.1 AEFM's environmental aspects and impacts register aligns with ISO 14001:2015, Clause 6.1.2.:-

- Determines the environmental aspects of all our activities within the scope of this EMP which we can control and influence and associated environmental impacts.
- Determines how compliance obligations apply to our environmental aspects
- Identifies risks (adverse impacts) and opportunities (beneficial impacts) resulting from significant aspects of our operation.

9.2 Process: Significant Aspects Criteria

AEFM used the environmental criteria outlined in our Environmental Aspects and Impacts Register. This Register is used to monitor, manage and report our environmental performances. The assumptions used in developing this register are explained below.

9.3 Operating Conditions

Environmental aspects and its associated impacts are entered, together with type of activity and activity area. Scores are then assessed against normal and abnormal scenarios.

9.4 Types of Environmental Impact

The aspects are categorised on their potential impacts: positive (beneficial) or a negative (adverse) environmental impact, or not applicable as appropriate, under the different operating conditions.

9.5 Impacts Scores (Severity)

The severity of the environmental aspects are scored using a five-point scale depending on the severity of the environmental impact. The score of one used for least impact and five representing the highest impact.

9.5 Scoping of Likelihood / Frequency of Impact

The likelihood of frequency of impacts are categorised based on the probability of the occurrence of the impacts or the frequency of the occurrence of the impacts.

9.6 Compliance Risk

A Yes or No can be selected in the Compliance Risk column, to highlight whether the aspect is governed by legal or other requirements. Aspects with an associated compliance risk are automatically deemed as significant and the cell automatically turns red.

The aspects register calculates the significance of each aspect. The scores for Severity and Likelihood / Frequency of Impact are multiplied to give rise to significance ratings of between 1 and 25. These scores are used to rank significance.

The cell colour with the significance column of the register indicates the level of significance. The table below summarises our significance scoring guide.

Table 1: Environmental Aspects Significance Guide

Score	Level of Significance	Risk	Action
1 to 3	Very Low	Acceptable Risk	Continue to monitor and review
4 to 9	Low	No Immediate Risk	Continue to monitor and operational control may be required
10 to 19	Medium	Immediate	Concern, continue to monitor and operational control must be put in place
20 to 25	High	High Risk	Urgent action required as well as monitoring and operational control must be put in place

10. Non-Conformity and Corrective Action

10.1 This section aligns with the ISO 14001:2015's Clause 4.3 This section of our EMS is used to demonstrate how we define the responsibility and authority for investigating and addressing non-conformances. The purpose of this section is for the purpose:-

- Identifying the cause(s) of the non-conformance(s);
- Analysing of the cause(s) of the non-conformance(s) to avoid recurrence(s)p;
- Exploring and implementing corrective action(s);
- Assessing the effectiveness of the corrective action(s).

10.2 Related Documents

The Environmental Management System Audit Action Log is used to log all non-conformances and can be accessed within the EMS sub-folder within the Sustainability SharePoint folder.

10.3 Process

The HSQE Manager is responsible for ensuring that:

- Details of any non-conformity identified, usually as a result of internal and external audits, are recorded using the environmental Management System Audit Action Log.
- The corrective actions and the timescales required for the implementation of these actions
- The actions taken are appropriate to the magnitude of the non-conformity and the resultant environmental impacts.
- The analyses of the effectiveness of corrective actions and determines the root causes of the non-conformities and takes necessary action to prevent recurrences.

- After an environmental incident, non-conformance information is provided in the Environmental Incident report Form.
- Completed forms are adequately documented and appropriate action to control, correct and deal with the consequences of non-conformities are implemented.

11. Environmental Management Review

11.1 This section of our EMS aligns with the ISO 14001:2015's Clause 9.3 and summaries our EMS review procedure:

- Review our environmental performance against targets;
- Ensure the continuing suitability, adequacy and effectiveness of our EMS and associated procedures;
- Review key elements of the EMS;
- Review findings from internal, external audits and evaluations of compliance.
- Assess opportunities for environmental performance improvement
- Ensure that appropriate resources/responsibility are available to implement and maintain the EMS.

11.2 Process

The Director and Operations Director will ensure:-

- The Management Review is the main agenda of at least once meeting during the year.
- The Management Review takes into consideration the following:-
 - The status of actions from previous management reviews.
 - Changing circumstances regarding external and internal issues relevant to the EMS, such as the needs and expectations of interested parties, compliance obligations, significant environmental aspects as well as risks and opportunities
 - Evaluation of the performance of AEFM against its environmental sustainability objectives.
 - Environmental performance information, such as the findings of recent internal audits and compliance evaluations.
 - The status of nonconformities and correct actions.
 - Relevant internal and external communications from interested parties.
- The Management Review addresses the continuing suitability, adequacy and effectiveness of the EMS and makes recommendations for improvement.
- Expected outputs from these meetings include decisions and actions related to improvements and change in the EMS and environmental objectives, as well as opportunities to integrate the EMS with other internal processes and in line with the strategic direction of AEFM.