

Engineering Workshop

Environmental Systems Manual

Meeting ISO 14001:2015 Requirements

General Note:

ISO 14001:2015 does not show a requirement for an Environmental Manual.

However, to create a smooth transition to the new standard, the ISO 14001:2004 manual is being integrated into the new manual so that cross referencing between the two systems becomes easier and enhances the understanding of the differences between the new and the old standards.

This is to be used as a reference document only

Introduction - London Borough of Redbridge Transport Services

Overview

The Engineering Workshop is certified by BSI for the Environmental Standard ISO 14001:2004. ISO certification is a requirement when submitting PQQ's on most tenders and allows Transport Services the use of the Kite Mark symbol on their vehicles and paperwork.

The operation has benefitted from this Management system which is maintained via internal audits and verified annually by BSI through on site assessments. All ISO Standards are updated periodically and the latest revision to the Environmental standards took effect from September 2015.

These updates must be implemented before September 2018 to maintain accreditation.

The new Quality and Environmental standards specify system requirements for those management systems when an organisation:

- a) aims to enhance customer satisfaction and environmental awareness through the effective application of the system, including processes for improvement of the system and the assurance of conformity to customer and applicable statutory and regulatory requirements and,
- b) needs to demonstrate its ability to consistently provide environmentally friendly products and services that meet customer and applicable statutory and regulatory requirements.

All the requirements of the ISO:2015 standards are generic and are intended to be applicable to any organisation, regardless of its type or size, or the products and services it provides.

Workshop

Carries out regular service, maintenance and repairs to Council Vehicles and supplements this with third party work from outside businesses and the general public.

Income

Transport Services, of which the Workshop is part of, produces a Revenue stream circa £8.0 million per annum. As legislation evolves and more requirements are placed on Transport operations, Transport Services invest a proportion of the revenue on new vehicles and workshop equipment to ensure legal compliance.

New Organisation Charts to be inserted here

1. Significant Changes in the ISO Standards

The amendments to ISO are significant with two of the main areas of change cover the following

a) Senior Management

Responsibility was vested with individuals (e.g. the Quality Manager and Environmental Manager) whereas the new standard requires top down responsibility. Senior Management involvement is paramount.

To précis the ISO 14001:2015 Environmental standard wording - Section 5: Leadership Senior Management shall demonstrate leadership and commitment with respect to the management system by

- a) Taking accountability for the effectiveness of the system
- b) Ensure the policy and its objectives are compatible with the strategic direction of the organisation
- c) Ensure the management systems are integrated into the organisations business processes
- d) Promote the use of the Process Approach and Risk Based thinking.
- e) Provide suitable resources and promote continuous improvement
- f) Enhance Customer Focus and Customer satisfaction

Senior Management also has responsibility for the Environmental Standard ISO 14001:2015 and should

- 1) Understand the organisations Environmental issues
- 2) Have a broader strategic consideration for the organisations Environmental impact
- 3) Make specific commitments to Sustainable development and social responsibility
- 4) Extend environmental influence to the procurement chain
- 5) At all times, demonstrate an understanding of the organisations Environmental compliance
- 6) Review and use performance indicators to track improvement

b) Objectives

Objective requirements under ISO 2015 are to be Risk Based and be based on the principles of being

Specific	A clear statement of what is to be achieved
Measurable	A number value that can be measured
Agreed	Management discuss and agree the aim.
Realistic	Can it actually be achieved? Don't set impossible targets
Timed	All objectives should have a time based end e.g. 12 months.
Environmental	New objectives need to consider their Environmental impact
Risk Associated	All objectives should be based on a business Risk Analysis

Transport Services Management has commenced upgrading to the new standards and has compiled a set of long term Risk Based Objectives. Data for the measurement of these objectives is being collated.

Environmental Objectives / Workshop

- 1) Fuel Consumption – measured from vehicle idling records from the vehicle telematics
- 2) Higher Tyre Life Utilisation – measured from the casing records received from Michelin Tyres

Definition of Objectives in ISO 2015: Clause 6.2

The standard requires that Senior Management 'establish quality objectives for relevant functions and levels'. The theory and purpose of quality objectives is referred to as business KPI's.

Objectives need not be financial; aim at improving the product or service for customers.

The process of setting and measuring objectives can be broken down into the following steps:

1. Identify areas where objectives will be set
2. Measure existing performance
3. Identify the reasons for the 'under-performance'
4. Develop S.M.A.R.T. objectives as outlined above
5. Monitor, Measure and Document performance against objectives
6. Modify objectives and strategy as they are achieved or as required

When planning how to achieve its quality objectives, the organisation shall determine:

- a) what will be done;
- b) what resources will be required;
- c) who will be responsible;
- d) when it will be completed;
- e) how the results will be evaluated.

1. Identifying Areas for Objectives – General guidelines

When considering objectives you should assess what you want to improve.

Do not set objectives to improve something which does not need improving e.g. if you are achieving 99.9% VOSA ratings, there are probably other areas of greater priority for improvement.

It is advisable to select only a limited number of areas for setting long term objectives so that they remain manageable.

2. Measure Existing Performance

Having identified an objective it will need its existing performance measured to create a start point.

It is important to be subjective when measuring this to avoid distorted figures. Decide at this point the timescale the objective is to run for; a month / a quarter / a year?

3. Identify Reasons

Identifying reasons for the results currently being achieved is the key to improving performance. Some may be obvious and we should not be afraid to take the easier options as a first step. Don't make the task more difficult than it needs to be.

4. Develop and Document Objectives

Objectives should be developed on the previously advised SMARTER basis

Specific / **M**easurable / **A**chievable / **R**ealistic / **T**imed / **E**nvironmentally assessed / **R**isk Associated

Be realistic. For example, reducing customer complaints from 50 to 49, means the objective is achieved but it would have done very little to improve performance.

5. Measure Performance

Following a suitable period of time, the ongoing performance against the objectives can be monitored and documented to determine if the actions are being successful. Internal audits will monitor these objectives.

6. Modify Objectives

As the organisation evolves, so should the Objectives

Caveat

Don't let meeting the objectives supersede the running of the business. Objectives are a management tool and not a goal within themselves.

ISO 2015 Standards Certification

Changes are near to completion which will allow Transport Services to apply for the new certification.

- 1) BSI have carried out preliminary assessments and graded the systems as "partial".
- 2) As the assessment was off site, only "partial" compliance could be granted.
- 3) Partial compliance shows Transport Services to be heading towards ISO 2015 certification
- 4) BSI will attend on 4th & 5th October and audit both systems over a two day continuous period.
- 5) BSI will upgrade certification to ISO 9001:2015 & ISO 14001:2015 providing there are zero non-compliances,

ISO 14001:2015 Definitions and changes from ISO 14001:2004

Product

Throughout the new standard, the term goods and services has been replaced by the term **product**.

Documented Information

The terms document and records are replaced by the term **documented information**. Documented information is to be controlled and maintained on the medium on which it is contained. Documented information can be in any format and media and from any source.

Improvement

The definition continual improvement has been replaced by **improvement**. The company will however continue to operate on the basis of “continual” improvement as this has not been confusing to Transport Services users.

Leadership

Top Management has been replaced by the term Leadership although the term “top management” is still referred to under Leadership. This clause also eliminates the requirement for a management representative.

Risk Based assessments

Instead of Preventative action, the new standard utilises a Risk Based approach by applying risk to the different aspects of QMS and acting on the potential issues that risk may raise.

External Providers

Suppliers are referred to in the QMS as external providers.

Interested Parties

Not replacing, but certainly impacting Customer Focus is the addition of **Interested parties** who are entities that either add value, or are interested in / affected by the activities of the organisation. Meeting the needs and expectations of interested parties contributes to the achievement of customer satisfaction

ISO 9001:2015 and ISO 14001:2015 External and Internal Issues and Considerations

These may include but are not limited to

External issues	
Statutory regulations affecting provision of services	- Changes in the Law
Operating permits e.g. Emissions	- New Technology
Economic plans for the future	- Organisational effect
Customer demographics	- Are they changing
Customer confidence / expectation	- On time / Right first time
Competitors	- Undercutting / Low cost entry
Industry standardisation and certification	- Organisational compliance
Industry regulations	- Organisational response
Environmental Impact	- Noise / Spills etc
External Considerations	
Government	- Legislations
Authorities	- Compliance
Regulators	- Compliance
Customers	- On time delivery
Insurers	- Demonstrable risk management
Trade Associations	- Recognition of ISO requirements
Competitors	- Delivery / Quality / Price
Council executive	- Cabinet meeting outcomes
Business partners	- "Buy in" to ISO systems
Contractors	- Compliance to ISO systems
Internal issues	
Structure of the Organisation	- Organisational chart
Roles within the Organisation	- Organisational chart
Reliable and stable workforce	- Issues that may affect this
Competency of workforce	- Training and competency schedule
Contractual Arrangements	- Customer / Supplier agreements
Service Level Agreements	- Trading levels / Standards to be achieved
Succession Policies	- Who takes over responsibility?
	-
	-
Internal Considerations	
Staff	- Working Conditions; Training opportunities; Appropriate
Business partners	- Good risk management
Trade Unions	- As staff
Contractors	- Compliance to ISO systems

**The following sections are to be used as
reference and cross referral only**

Uncontrolled

ENVIRONMENTAL MANAGEMENT SYSTEM

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Supporting Information

- Definitions
- Register of Environmental Aspects and regulatory/policy requirements
- Criteria for determining sustainability impact / significance (EMF 722.1)
- List of EMS System Forms
- Depot Procedures
- Depot Site Plan showing Environmental Waste areas and drainage interceptors
- Re-Act – The London Borough of Redbridge Environment Action Plan
- Dangerous Goods Audit Report
- DGSA Checklist – Monitoring Dangerous Goods requirements
- Environmental Control Procedures – Performance & Warranty / EMS Manager

EMP 1. - ENVIRONMENTAL POLICY

1.Scope

The Transport Services Engineering Workshops is part of the Highways and Cleansing service area which provides fleet procurement, fleet management, vehicle maintenance and vehicle and plant repair services for circa 600 Council owned vehicles and assets.

The International Organisation Standard, ~~ISO 14001:2004~~, ISO 14001:2015 gives the requirements for environmental management systems by addressing the principles and processes surrounding the environmental issues to be addressed by organisations of this type. The scope of the activity covered by the Engineering Workshop is for the provision of repairs, maintenance, service and associated automotive services including the procurement of vehicles. and this Environmental Manual seeks to address the requirements defined by this standard for this organisation.

As described in Appendix1 – Definitions, the Engineering Workshop will,

- a. Identify and control the **environmental impact** of its activities and services.
- b. Continuously adhere to current **Legal Requirements** and new **Legislation**
- c. Prevent **Pollution** through vehicle procurement and waste control
- d. Strive to **continually improve** its environmental performance
- e. Apply a systematic approach to setting environmental **objectives** and targets
- f. **Monitor, measure and document** that the objectives have been achieved.
- g. Document the system and make it available to **all interested parties**
- h. Ensure that the policy and manual are **available to the public**

Article I. 2. References

In addition to the ~~ISO 14001:2004~~, ISO 14001:2015 standard, the company will comply with the London Borough of Redbridge Environment Action Plan (REAct), directives from the on site Environmental officer in the form of the Public Buildings Manager and recommendations from internal or external Dangerous Goods Safety Advisors (DGSA). It will also adhere to any applicable British and / or International Standards and review supplier and customer specifications appropriate to the environmental impact they may have..

Article II. 3. Terms & Definitions

The Engineering Workshops Environmental Management System (EMS) uses the same internationally recognised terms, vocabulary and definitions given in ~~ISO 14001:2004~~, ISO 14001:2015. Acronyms, terms, vocabulary and definitions unique to the organisation, customers, industry and region and referenced throughout our Environmental Management System (EMS) are contained in within the Appendix 1.

EMP 2. - ENVIRONMENTAL ASPECTS

1. Purpose

This manual seeks to describe the method of identifying and evaluating the environmental aspects and impacts on the environment of the Engineering Workshops activities. The environmental impact referred to in this manual will relate to any incident or occurrence that is likely to affect the environment, humans, animals or habitats.

Incorporated in this manual are the procedures to prepare and maintain a Register of Significant Environmental Aspects & Impacts (EMF721.1)

2. Scope

This applies to all facets of the Engineering Workshop operations.

3. Responsibilities

The Performance and Warranty Manager is the EMS Manager responsible for registering Significant Environmental Aspects and Impacts.

It is the responsibility of the Engineering Workshop Management to aid the EMS Manager in the compilation of the Register by bringing to their attention any environmental issues relating to their individual sphere of influence.

4. Definitions

Environmental aspects, impacts and significance are defined in the “Definitions” section of this manual.

5. Procedure

The identification and evaluation of environmental impacts will be compiled through:-

- a) Examination of legislative and regulatory requirements under regular reviews carried out by Engineering Management and a DGSA Auditor.
- b) Identification against the Environmental Aspects Checklist EMF 721.2
- c) Evaluation, through environmental risk assessment EMF 722.1, and compilation of significant environmental aspects
- d) Examination of existing environmental management practices and procedures and identification of any required corrective actions.

A register of significant Environmental Aspects & Impacts, shall be used as the basis for forming the Environmental Policy, the setting of objectives and the formation of the Environmental Programme.

The Environmental Aspects and Impacts Register forms a major part of Management Review. Reviews of the Register will also take place where audits identify the need or when any new projects are being planned which may have a significant impact on the environment.

6. Relevant Forms/Files

EMF 726.1	Environmental Aspects and Impacts Register
EMF 701.1	COSHH Register
EMF 721.1	Aspects and Impacts Worksheet.

EMP 3. LEGAL AND OTHER REQUIREMENTS

1. Purpose

To maintain a Register of Legal and Other Requirements which are applicable to the Engineering Workshops significant environmental activities, products and services.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

The Engineering Manager, in conjunction with the Performance & Warranty Manager and Engineering Managers, in liaison with employees in their area, are responsible for compiling a Register of legal, regulatory and policy requirements.

Engineering management are responsible for periodically reviewing the Register at Management Review meetings.

4. Procedure

The Engineering Manager, Performance & Warranty Manager and Engineering Managers will be responsible for ensuring the preparation of a list of legislation, regulations and policies that are applicable to their activities, products and services. The list will be collated to form a Legal Register. This Legal Register will be approved by the Engineering Manager and will then be maintained EMS Manager.

Any changes or additions to legislative or regulatory requirements will be brought to the attention of the EMS Manager for inclusion in the register. Legal, regulatory and policy requirements will be reviewed at Management Review meetings.

The organisation will subscribe, as appropriate, to professional bodies and publications to ensure that it is aware of current and impending legal and policy changes. It will also be subject to any LBR directives on environmental requirements and with adherence to LBR's Re-Act programme where operational conditions dictate that this is possible. The EMS Manager will disseminate information to managers responsible for those areas that are, or likely to be, affected by any legal or policy change.

5. Relevant Forms/Files

EMF 724.1	Legal Register
EMF 725.1	Legal Register Index

EMP 4. - OBJECTIVES, TARGETS AND PROGRAMMES

1. Purpose

To set out objectives and targets, and the means of achieving them, to improve environmental performance, meet legislative & regulatory requirements and the Engineering Workshops environmental policy particularly regarding the prevention of pollution.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

Engineering Management are responsible for the setting of their own objectives and targets. Management at these levels will specify the means of achieving the objectives and allocate responsibilities.

The Public Buildings and Depot Manager is responsible for providing support and approving and supplying resources for implementing actions to achieve environmental objectives.

The EMS Manager is responsible for co-ordinating progress of the Environmental Programme covering the Engineering Workshops activities. They are also responsible for reviewing the list of objectives and targets set down by Senior Management for the Workshops Environmental Programme in conjunction with reviewing the means by which these are to be achieved.

Objectives are to be measurable and reflect improvement on the high risk areas of the Aspect and Impacts worksheet.

The continuing objectives, set as a function of the Impacts worksheet have been agreed and Measuring and monitoring will be carried out on

- 1) Hydraulic & Engine Oils** (reduce Workshop oil spills)
- 2) Hazardous Waste** (reduce disposal of hazardous waste)
- 3) Fuel** (Bulk fuel and oil deliveries)
- 4) Vehicle Procurement** (Comply to requirements of the London LEZ)

In addition, two new long term objectives have been added

- 3) Fuel Consumption** – measured from vehicle idling records from the vehicle telematics
- 4) Higher Tyre Life Utilisation** – measured from the casing records received from Michelin Tyres

The previous objectives were:-

- i) Vehicles purchased for the London Borough of Redbridge fleet will comply to the requirements of the London Low Emission Zone <http://www.tfl.gov.uk/roadusers/lez/vehicles/2535.aspx> as a minimum and exceed the European Regulation (EC) No [715/2007](#) whenever possible.
- ii) Bulk fuel and oil deliveries – no spills See Legal Register
- iii) Underground and overground storage tanks – no leaks See Legal Register
- iv) To reduce Workshop oil spills and reduce requirements for disposal of hazardous waste See Legal Register

4. Procedure

The Engineering Workshop will, where legislative and operational procedures allow, establish environmental objectives. The objectives and targets set at this level will reflect the contributions received from employee level. These will be reflected in the Environmental Policy.

An Environmental Programme has been compiled and identifies the means, resources and operatives responsible for achieving the planned results for each element in the Environmental process.

The EMS Manager will regularly review progress of the Programme. Information will be gathered, via Internal Audits, and evaluated to check on compliance. A summary of the information will be passed to the EMS Manager for review and non-conformities raised if required.

The progress of the objectives and targets will be reviewed by the Engineering Management Team as part of Management Review.

EMP 5. - STRUCTURE AND RESPONSIBILITY

1. Purpose

To describe the Engineering Workshops structure and set out roles and responsibilities for effective management of the Environmental Management System (EMS).

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Organisational Structure

The Organisational structure is that structure contained within the Quality Manual

4. Roles and Responsibilities

4.1 Role of Engineering Senior Management

The Engineering Manager is ultimately responsible for ensuring that the Workshop complies with its environmental policy, objectives and targets. The Engineering Manager will approve policy matters relating to the EMS, provide support and approve resources for implementing the EMS in an effective manner and attend Management Review meetings.

The Engineering Manager is responsible for making staff aware of the EMS and its impacts in their area and for appointing representatives where required.

4.2 Engineering Managers & Charge hands

Engineering Managers are responsible for providing support and requesting resources for implementing the EMS in an effective manner. They are also responsible for attending Management Review meetings and considering and approving, as relevant, reports and plans relating to environmental performance.

Engineering Managers are responsible for:-

- the effective implementation of the EMS in their areas;
- identifying environmental aspects arising from the activities in their area of responsibility;
- ensuring compliance with environmental legislation and communicating these requirements
- identifying staff training needs
- make sure that staff are competent to carry out their duties in relation to any significant environmental impact.

4.3 Role of the EMS Manager

The EMS Manager is the Management Representative and is responsible for:-

- (a) co-ordinating activities to implement the EMS;
- (b) allocating Audit Teams;
- (c) ensuring that Management Review is carried out;
- (d) preparing, with other members of staff, reports on Engineering environmental performance;
- (e) liaising with EMS Representatives to achieve the Environmental Management Programme;
- (f) preparing and maintaining EMS documentation in liaison with other members of staff.
- (g) reporting progress to senior management & recommending areas for improvement.

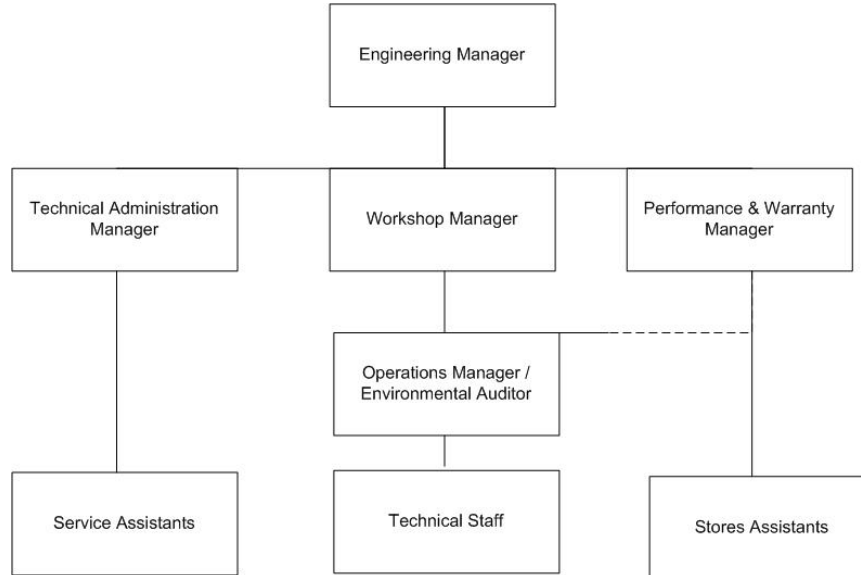
4.4 Role of EMS Auditor

The Environmental Auditor is responsible for:-

- (a) assessing the suitability and effectiveness of the Environmental policy;
- (b) through Environmental Audits, assisting the EMS Manager in maintaining the EMS
- (c) reporting non-conformities with suggestive corrective action
- (d) advising on any potential Dangerous goods and required procedures and control

5. Relevant Forms/Files

This structure will be replaced when the new structure is available.



EMP 6. - COMPETENCE, TRAINING AND AWARENESS-RAISING

1. Purpose

To describe the actions and responsibilities involved in:-

- a) identifying training needs and ensuring that appropriate training is given to staff whose work may create a significant impact upon the environment;
- b) ensuring that staff referred to above are competent based on appropriate education, training and/or experience; and
- c) ensuring that all staff are aware of the Engineering Workshops activities to improve its environmental performance.
- d) ensuring that contractors are competent and trained to perform any work on the Workshops behalf that could have a significant impact on the environment.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

Engineering Managers will be responsible for ensuring that employees are given appropriate training to carry out their work in line with the Engineering Workshops environmental commitment.

Where operationally required, Engineering Managers are responsible for ensuring that people working on behalf of the Engineering Workshop have the appropriate training and competence to perform their tasks without creating a significant adverse impact on the environment.

The EMS Manager is responsible for maintaining a summary of minimum qualification/experience requirements for staff involved in the Environmental programme.

4. Procedure

4.1 Training

All new employees to the Engineering Workshop will receive environmental awareness training as part of induction. This will include emergency procedures.

Staff training needs are identified and provision made according to the Engineering Workshops ongoing commitment to the Investors in People Scheme.

Appropriate environmental training will be given to all employees whose activities could have a significant environmental impact. Training needs will be reviewed at least annually by Engineering Managers during staff performance reviews.

The EMS Manager will review training needs in the case of key staff involved in the maintenance of the EMS.

4.2 Staff Awareness

Environmental awareness training will be provided and will include an explanation of the actual and potential significant environmental aspects and impacts relating to the Engineering Workshop and its standard operating procedures.

Training sessions by in-house staff or external providers will be used to communicate to staff the Workshops commitment to improving its environmental performance and their role in achieving improvement.

4.3 Competence of Contractors

Prior to the commencement of any contracted out work that could have a significant impact on the environment, checks will be made on the competence of the operators. The competence of contractors will be assessed as part of the tendering process where this exists. Contractors will be made aware of the significant environmental aspects and control measures relating to their contracted work. Contractors will also be made aware of the Engineering Workshops environmental commitment.

EMP 7. - COMMUNICATION

1. Purpose

To describe the actions and responsibilities involved in:-

- (i) Internal communication on environmental matters dealt with under the Environmental Management System (EMS);
- (ii) Receiving, responding to, and recording communications with, external interested parties; and
- (iii) Communication of environmental issues, in regards to the Workshops environmental policy.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

The Engineering Manager, in conjunction with the Performance & Warranty Manager and Engineering Managers, are responsible for reporting on environmental matters.

Engineering Managers are responsible for:-

- (i) Ensuring staff in their area are aware of EMS activities that are likely to affect them;
- (ii) Dealing with enquiries concerned with their areas environmental performance; and
- (iii) Passing relevant information to the EMS Manager for use in management reporting.
- (iv) Reporting change of the manual to ICT so as to update the internet link.

The EMS Manager is responsible for:-

- (i) Collating relevant information and preparing Management Review reports;
- (ii) Dealing with external environmental performance enquiries; and
- (iii) Recording communications about the Engineering Workshops environmental performance.
- (iv) Communicating to all staff with training and through induction.
- (v) Making the manual available to all staff to read by printing a copy off and storing it within the workshop control office.

4. Procedure

4.1 General Communications about Environmental Performance

General enquiries about environmental performance and the EMS will be passed to the EMS Manager to deal with. Where the enquiry concerns a significant environment aspect, a record will be made. The enquiry will either be dealt with directly by the EMS Manager or passed to the appropriate Manager for action. A file of all communications received or sent will be maintained.

4.2 Specific Enquiries about the Engineering Workshop Environmental Performance

Specific complaints relating to the Engineering Workshop environmental issues will be copied for information to the EMS Manager. A summary of relevant enquiries received by the EMS Manager will be reported as part of Management Review.

4.3 Consulting and Involving Interested Parties in Environmental Performance

When consultation on an environmental performance matter is planned, interested parties will be contacted to obtain their views. The views will be taken into account in the drafting or amendment of environmental policies, objectives or targets, as appropriate. Interested parties will be actively encouraged to comment on the Engineering Workshops environmental performance at any time.

4.4 Emergency Preparedness

Communications with external bodies and authorities relating to accidents or emergencies are covered by the LBR Emergency Preparedness policy schedule and the Engineering Workshop policy which is held by the Engineering Manager.

5. Relevant Forms/Files

Emergency Preparedness – see policy EMP 10

EMP 8. - DOCUMENT CONTROL

1. Purpose

To describe the actions and responsibilities involved in the issue and control of Environmental Management System (EMS) documentation.

2. Scope

All documents having a direct influence on the EMS operation.

EMS documentation managed by the EMS Manager comprises the EMS Manual, intranet and internet pages and associated forms and drawings.

3. Responsibilities

The EMS Manager is responsible for the issue, amendment and approval of all EMS documentation. They are also responsible for ensuring communication of any significant change to EMS documentation is cascaded throughout the organisation to all staff.

4. Procedure

4.1 EMS Documentation Issue

The EMS Manager will electronically control all documents relating to the EMS. Changes to documentation can only be made with the prior approval of the EMS Manager. Printed copies are marked uncontrolled and are unauthorised.

The EMS Manager, in liaison with Engineering Management, will approve and review the EMS Manual and supporting procedures, documents and forms at Management Review (EMP 16). EMS Documentation will have a relevant issue status, date and authorisation.

Access to the EMS manual and documents will be available to all those who can have an influence on the performance of the EMS via the Engineering Workshop G:\ drive. Any significant changes or updates will be communicated to employees.

4.2 Document Change

Any member of staff may propose changes to EMS Documentation. Proposals will be referred to the EMS Manager to determine the need to consult others in respect of the proposal.

All changes will be reviewed and, as appropriate, approved by the EMS Manager. Amendments to EMS documents will be made electronically.

Revised and withdrawn documentation will be suitably identified and electronically archived for a minimum of three years.

4.3 General Requirements for EMS Documentation

A current version of the EMS Manual will be held in electronic form by the EMS Manager who may authorise the issue of uncontrolled copies of EMS Documentation. External documents that relate to the effective control of the EMS will be held at point of use and their distribution controlled.

EMP 9. - OPERATIONAL CONTROL

1. Purpose

To control those operations and activities with significant environmental aspects in a manner that is consistent with the Engineering Workshops Environmental Policy, objectives and targets.

2. Scope

All operations and activities identified in the Environmental Policy Manual.

3. Responsibilities

Engineering managers are responsible for ensuring that procedures are in place in the Workshop operation to ensure that no deviation from the Environmental Policy or objectives can occur.

All employees are responsible for following the operational procedures.

4. Procedure

4.1 General Requirements

Procedures will be developed and implemented for operations where their absence would result in significant environmental impact. The procedures will be followed by staff in the specified area to which the procedures apply.

4.2 Procurement of goods and services

Suppliers and contractors will be assessed and selected taking into account the significant environmental aspects and impacts of the goods and services supplied to the Workshop.

The assessment and selection procedure will encompass the London Borough of Redbridge (LBR) Environment Action Plan (Re-Act Sustainability Procurement) and requirements to suppliers.

Each external contractor whose activities may involve a significant environmental impact shall act in accordance with the Engineering Workshops Environmental Policy (see EMP 6)

Periodic environmental audits of suppliers may be conducted, if required, and the results recorded and sent to the EMS Manager for review. The report will include details of any non-conformities.

4.3 Equipment maintenance

Engineering Management will establish and implement a robust and verifiable maintenance programme on all equipment that could have an influence on activities with a significant impact on the environment. This will include documented procedures to ensure that all equipment used for measuring environmental aspects is calibrated (if required) at determined intervals to guarantee accuracy of environmental data.

4.4 Hazardous substances

Engineering Management will establish and maintain documented procedures to ensure that the control of Substances Hazardous to Health (COSHH) are in a manner that prevents pollution, waste and harm to those who handle them.

EMP 10. - EMERGENCY PREPAREDNESS AND RESPONSE

1. Purpose

To describe the actions and responsibilities involved in:-

- (i) identifying potential for, and responding to, accidents and emergency situations, and to prevent and mitigate the associated environmental impacts.
- (ii) Reviewing, revising and testing the response to accidents and emergency situations.

2. Scope

This applies to all facets of the Engineering Workshop operations.

3. Responsibilities

The Depot Manager (or his designated Health & Safety Officer) is responsible for co-ordinating statutory activities to meet the requirements of the Health & Safety at Work Act 1974.

The Depot Manager is responsible for developing and maintaining the Area's Emergency and Incident Response Plan, and co-ordinating the sites response to deal with major incidents.

Engineering Managers are responsible for ensuring that their activities are managed to prevent the occurrence of accidents and emergency situations leading to environmental impacts and that effective response plans are in place to deal with such accidents and emergencies should they occur. They are also responsible for assessing and implementing controls to prevent or otherwise control accidents or emergencies in liaison with the Depot Manager (or his designated Health & Safety Officer).

4. Procedure

4.1 Major accidents/emergencies

An Emergency Plan, to deal with major incidents that affect the Workshop, is maintained by the Engineering Manager. The Plan is reviewed at least annually and following an accident or emergency. The plan, either in part or in whole, is exercised typically every 12 months.

The Emergency Plan will assess the potential environmental impacts of major incidents. It will contain procedures for preventing and mitigating these impacts.

4.2 Other accidents/emergencies

LBR's Health & Safety Policy requires a risk assessment of tasks carried out by all Workshop employees and also by contractors employed by the Council. The

risk assessments are recorded and periodically reviewed by the relevant service areas.

All accidents, near-misses or dangerous occurrences, regardless of their resulting injury or damage, are reported to the Manager of that activity. In cases where significant environmental impact is likely to be caused, the senior person present will contact the appropriate public authorities.

A record of the incident will be made and a copy passed to the Depot Manager (or his designated Health & Safety Officer) following which the Engineering manager, in conjunction with the Depot Manager (or his designated Health & Safety Officer), will carry out an investigation.

The EMS Manager will be notified and will participate in the investigation where the environment may be harmed.

Any deviation from the EMS procedures arising from this investigation will be reported to management for action in accordance with EMP13 (Non-conformance and Corrective and Preventative Action).

4.3 Contractors

Prior to commencing any work, contractors shall be informed by the relevant management of any controls or actions that must be followed to protect the environment. A record of the notification shall be made by the person informing the contractor.

Where the contract is of a routine or regular nature, the contractor shall be informed of the actions or controls to be followed at the commencement of the contract otherwise contractors shall be informed before commencing each period of work. A record of the notification shall be made.

Before the contractor next commences work, any changes to the controls or actions they are subject to shall be notified to them and a record of the change in notification made by the relevant manager.

EMP 11. - MONITORING AND MEASUREMENT

1. Purpose

To describe the actions and responsibilities involved in measuring and monitoring the characteristics of the Engineering Workshops operations and activities that can have significant impacts on the environment.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

The EMS Manager in conjunction with the Engineering Managers is responsible for identifying those activities that require monitoring and measuring. Engineering Managers are responsible for the measuring equipment in areas of their control and its calibration.

4. Procedure

The process and frequency for monitoring and measuring activities with a significant environmental impact, within the normal operational limits, shall be written in standard operating procedures. The procedure will identify any measuring equipment required.

The results of these measurements shall be recorded and variations shall be brought to the immediate attention of the relevant Manager, who will initiate appropriate corrective action. These actions and their results will be recorded.

These records will be reviewed regularly at Management Review meetings to ensure compliance with relevant environmental legislation and regulations and conformity with the Workshops environmental objectives, targets and the Environmental Management System.

Calibration records for the measuring equipment will be kept by the appropriate service area management.

EMP 12. - EVALUATION OF COMPLIANCE

1. Purpose

To describe the actions and responsibilities involved in the evaluation of compliance with environmental legislation, regulations and any other codes or practices.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

It is the responsibility of all Engineering Managers to conduct periodic evaluations to ensure compliance to environmental legislation.

It is the responsibility of the EMS Manager to ensure records of these evaluations are maintained.

4. Procedure

- (i) Legislative compliance evaluation will take place every six months at the Engineering Workshop management meetings for environmental requirements identified in the policy.
- (ii) Engineering Managers will bring to the attention of those present any actual or potential changes to environmental legislation that may affect the activities of the Workshop.
- (iii) Compliance with other codes and practices will also be evaluated at the meeting.
- (iv) Records of the meeting will be held by the respective Engineering management.
- (v) Changes will be forwarded to the EMS Manager for updating following each meeting.

5. Relevant files/forms

EMP 13. - NON-CONFORMANCE AND CORRECTIVE AND PREVENTIVE ACTION

1. Purpose

To describe the actions and responsibilities involved in:-

- (i) identifying and controlling activities which do not conform to the environmental policies and objectives; and
- (ii) preventing (re)occurrence of non-conformities.

2. Scope

This element applies to all facets of the Engineering Workshop operations

3. Responsibilities

Engineering Managers are responsible for identifying and putting in place measures to address potential environmental risks as part of the Risk Management programme co-ordinated by the DGSA Advisor.

All staff are responsible for identifying non-conformities within their work areas. Engineering Managers and team leaders are responsible for dealing with non-conformities.

The EMS Manager is responsible for:-

- (i) tracking non-conformities as notified;
- (ii) assisting those dealing with non-conformities and ensuring completion of corrective or preventive action, except in the case of environmental audits;
- (iii) reporting non-conformities at the Management Review.

In the case of environmental audits, the Auditor will be responsible for ensuring completion and continuing effectiveness of corrective or preventive action.

4. Procedure

4.1 Non-Conformity

Where non-conformity is identified related to an activity that has a significant environmental impact, it shall be brought to the attention of both the relevant manager and the EMS Manager.

It will be assigned to the person responsible for that activity, who will be required to take immediate remedial action to stop or mitigate the environmental impact. The action to be taken will be recorded and the timescale agreed with the EMS Manager. A non-conformance report will be raised **EMF 703.1** identifying the details of the non-conformity. The report will be logged and given an identifying number. The assignee will be required to identify measures to prevent the re-occurrence of the non-conformity. Where the magnitude of the environmental impact is regarded as unacceptable, or the non-conformity is not controlled within the agreed timescale, the EMS Manager has the authority to stop the activity until the impact is controlled at an acceptable level.

In the case of non-conformity identified as part of an environmental audit, the Auditor will ensure completion of the Report. In any other case, the EMS Manager will ensure Report completion.

Details of the non-conformity and remedial action will be recorded on the Report, with any supporting documents being held with the Report.

4.2 Corrective Action

This will only apply where the non-conformity described above does not result in a significant environmental impact, in which case, the Non Conformity instructions above will apply. In the event that corrective action is required, a Corrective Action Request (CAR) **EMF 704.1** will be issued. This process will also be initiated where non-compliance is identified in an internal audit. The CAR will identify the non-compliance and be assigned to the appropriate person...

The recipient will:-

- (i) investigate the cause of the non-compliance;
- (ii) identify and start corrective action, recording the proposed action on the Report;
- (iii) agree with the EMS Manager or Auditor, as appropriate, the corrective action and a timescale for completion; and
- (iv) ensure that corrective action is completed in an effective manner.

On completion of corrective action, the recipient will initial the Action Plan section of the Report and return it to the EMS Manager via the Auditor, as appropriate. This may be done in electronic format.

All Corrective Action Reports will be notified without delay to the EMS Manager. The EMS Manager will allocate a unique reference number to assist in monitoring progress on corrective action.

4.3 Preventive Action

Engineering Managers will identify any potential significant environmental impacts arising from their activities as part of the LBR's Risk Management Programme co-ordinated by the DGSA Advisor. These impacts and any control measures will be recorded.

4.4 Reporting Corrective and Preventive Action

Corrective and preventive action and their effectiveness will be considered at Management Review meetings (see EMP16 - Management Review).

4.5 Recording changes

Any changes to documented procedures as a result of corrective or preventive action will be recorded following EMP8.

5. Relevant Forms/Files

EMF 703.1: Non-conformity report.

EMF 704.1: Corrective Action Request.

EMP 14. - CONTROL OF RECORDS

1. Purpose

To describe the actions and responsibilities involved in maintaining Environmental Management System (EMS) records.

2. Scope

All records needed to implement and maintain the EMS, and for recording effectiveness in achieving environmental objectives and targets. Electronic Records are preferable but may be in paper format.

3. Responsibilities

The EMS Manager is responsible for ensuring that appropriate EMS records are maintained to demonstrate effective control of Environmental issues and systems...

4. Procedure

EMS Records will include (held at various locations within the Workshop):-

- Calibration Records
- Audit Records
- Environmental Manual Update Records
- Management Review Records
- Index of Registers and Records
- Non-Conformance Records
- Accident/hazard reports
- Complaints Log and Action Reports.
- Inspection and maintenance Reports
- Inventory and Identification of Environmental related Equipment
- Monitoring and measurement records
- Training Records
- Environmental performance records of significant suppliers and contractors.

The EMS Manager will hold a list of records and information relating to the operation of the EMS and an index of EMS files.

EMS records will be stored and maintained in such a way that they are readily retrievable and prevented from loss, damage or deterioration. Records will be labelled so that they can be traced to the appropriate Workshop activity. Records will be held subject to the LBR's retention scheme. Individual records may have longer retention periods.

5. Relevant files/forms

Performance & Warranty Managers Intranet / Computer system

EMP 15. - INTERNAL AUDIT

1. Purpose

Ensure that the Environmental Management System (EMS) is implemented suitably maintained to achieve environmental improvement in the Workshops activities.

2. Scope

This applies to all Environmental Audits that assess Workshop environmental performance.

3. Responsibilities

The EMS Manager is responsible for preparing and managing the Environmental Audit Programme.

The Auditor is responsible for liaising with Workshop Management, carrying out the Audit, and following-up Audit findings.

The Engineering Manager is responsible for ensuring support is provided by staff to facilitate the Audit process. All Managers and staff are responsible for assisting during the Audit process to ensure that the Audit is effective.

4. Procedure

4.1 Environmental Audit Programme

Audit work is carried out according to a rolling Programme so that all parts of the workshop organisation that can have an influence on the EMS are audited at least once in every twelve months. The Programme will also set out priorities and resources required to deliver Audits in an effective manner and will reflect the environmental importance of the workshop's activities in relation to audit frequency.

The Programme will be reviewed annually, at which time a scheme for the following year will be drawn up. The Programme will take into account the results of the previous year's audits in determining the frequency of auditing activities. The draft Programme will be considered and, following any amendments, approved at Management Review.

4.2 Appointment of Auditors

The Senior workshop management have stipulated that the Environmental Auditor carries a recognised DGSA qualification and the Transport Operations, who holds the recognised qualification, has been appointed as the Internal Environmental Auditor.

4.3 Preparing Audits

Before each Audit, the EMS Manager will agree the condition / area to be audited with the Auditor. The EMS Manager will provide the Auditor necessary documents and information to prepare for and conduct the Audit. These documents will include (after initial audits are completed) a copy of the last audit conducted in the area in order to avoid duplication and to confirm that previous non-compliances have not been repeated.

The Auditor will assess the information and, as necessary, obtain further material to assist in preparing the Audit and draw up a checklist to assist during the Audit. Samples of checklists have been provided but will be updated for relevance to each new audit.

All staff with responsibilities for the area(s) being audited will liaise, as necessary, with the Auditor to ensure that the Audit is effective.

4.4 Conducting Audits

The Auditor will ensure that corrective and preventive actions, taken as a result of previous non-conformities or non-compliances, remain effective. The Auditor will note down any observations (both good and bad practice), including non-conformities and non-compliances, during the Audit. Any potential/actual breach of legislation or incident which, in the opinion of the Auditor, is causing or likely to cause significant harm to the environment, will be reported to Auditee Management and the EMS Manager at the time or as soon as possible thereafter to determine further action and a non-conformity report issued.

Engineering Management will be informed by the Auditor of the findings. Areas of non-compliance will be recorded either on Forms EMF 703.1 or EMF 704.1. The Auditor will agree corrective action with Engineering Management at this time. A record will be made on the form of agreed actions and timescales.

4.5 Completing Audits

The Auditor will be responsible for ensuring that resultant corrective action has been properly carried out. Where corrective action has not been taken in a proper or effective manner, the EMS Manager will inform the Engineering Manager to determine what steps will be needed to conclude the Audit process.

Following all corrective action being completed, the auditor will collate and pass all Audit documentation, including copies of any Corrective Action Requests completed to the EMS Manager for filing. Documents may be handled in electronic format.

5. Relevant Forms

- EMF 703.1: Non-Conformance Report.
- EMF 704.1: Corrective Action Request.
- EMF 721.1: Aspects and Impacts Worksheet.

EMP 16. - MANAGEMENT REVIEW

1. Purpose

To ensure environmental issues are subject to formal periodic reviews. The Management Review will be carried out to:-

- (i) determine the ongoing suitability and effectiveness of the EMS; and
- (ii) assess the performance of the EMS, with the objective of improving the workshop's overall environmental performance.

2. Scope

The EMS as detailed in the EMS Manual.

3. Responsibility

The overall responsibility for Management Review falls to the EMS Manager.

The Management Review will be carried out by the Engineering management of the workshop. The EMS Manager will ensure that records of Management Reviews are kept and this Procedure is complied with.

4. Procedure

A Review of the EMS will be carried out to ensure that each of the following are considered at least once a year:-

- (i) outstanding items/recommendations from previous Management Review.
- (ii) review of environmental objectives, targets and environmental performance;
- (iii) findings of EMS audits;
- (iv) evaluation of EMS effectiveness to deliver environmental policy and objectives;
- (v) evaluation of environmental policy or other elements of the EMS and the need for changes in the light of internal or external factors, including:-
 - Compliance with legal requirements and other requirements to which the LBR subscribes;
 - legislative/policy change;
 - concerns of interested parties, including staff suggestions;
 - changes to Council activities and structure;
 - lessons learned since the last Management Review;
 - reporting on communications;
 - resources needed to implement the EMS, including training;
 - non-conformities declared since the last Management Review;
 - relevance and effectiveness of EMS Procedures; and
 - any other matters relevant to the effective performance of the EMS.

The EMS Manager will schedule each Management Review meeting and circulate an Agenda for discussion at the Meeting. Minutes of Management Review meetings will be prepared following each meeting and distributed as necessary.

All records of Management Review meetings and reports will be maintained according to the Control of Records procedure. The EMS Manager will ensure that any necessary action arising from each Management Review is carried out and documented.

Relevant documents/files

Management Review minutes

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Appendix 1. – ABBREVIATIONS AND DEFINITIONS

The following terms will apply to this document

Continual Improvement - Process of enhancing the environmental management system (wherever operationally possible) to achieve improvements in overall environmental performance in line with the Workshop's environmental policy.

LBR – The London Borough of Redbridge or any of its services including suppliers and contractors. An individual department or service may be considered within the Environmental Management System in its own right.

Engineering Managers – Collective terminology for the Workshop Manager, Performance & Warranty Manager, Technical Administration Manager (where required) and the Workshop Chargehand.

Environment – The surroundings in which the Workshop operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspect - Element of the Workshop activities, products or services that can interact with the environment. Aspects are identified using the method set out in EMS21.

Environmental Impact - Any change in the environment, whether adverse or beneficial, wholly or partially resulting from the Workshop's activities, products or services.

These are as follows:

- Emissions to the atmosphere
- Discharges to water or sewer
- Waste
- Contaminated Land
- Use of land, water, fuels and energy and other natural resources
- Discharges of thermal energy, noise, odour, dust, vibration and visual impact
- Effects on specific parts of the environment or ecosystems (e.g. Human health and safety)
- Other effects - environmental education

Environmental Management System - The part of the overall management system that includes organisational structure, planning activities, responsibilities, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental Audit - A systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's environmental management system conforms to the environmental management system audit criteria set by the Workshop, and for communication of the results of this process to management.

Environmental Objective - Overall environmental goal, arising from the environmental policy, that the Workshop has set itself to achieve, and which is quantified where practicable.

Environmental Performance - Measurable results of the environmental management system, related to the Workshop control of its environmental aspects, based on its environmental policy, objectives and targets.

Environmental Policy - The Workshop's statement of intention and the principles employed in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets.

Environmental Review - An initial comprehensive analysis of the environmental aspects, impacts and performance related to activities of the part of the Council being considered.

Environmental Target - Detailed performance requirement, quantified where practicable, applicable to the Workshop or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested Party - Individual or group concerned with or affected by the environmental performance of an organisation.

Environmental Programmes - Programmes for improving or reducing significant environmental impacts.

Prevention of Pollution - Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs.

EMF 721.1

London Borough of Redbridge Engineering Workshops Environmental Aspects and Impacts Worksheet																				EMF 721.1
Activity to be audited	Environmental Impact							Frequency			Level of control			Impact Probability			Legal Risks			
	AI	GW	SW	SO	SP	HA	QL	C3	Inf2	Occ1	L1	M2	H3	L3	M2	H1	L3	M2	H1	
Ad Blue	0	2	2	1	0	0	0	3	0	0	0	0	3	3	0	0	3	0	0	-1
Hydraulic Oil	0	3	3	3	3	3	3	3	0	0	0	0	3	3	0	0	0	0	1	14
Antifreeze Control	0	2	2	1	1	1	0	3	0	0	0	0	3	3	0	0	0	2	0	2
Oily Rag Control	0	0	0	3	3	3	0	0	2	0	0	0	3	3	0	0	0	2	0	3
Oil Filters	0	0	0	2	2	2	0	0	2	0	0	3	3	0	0	0	0	2	0	0
Gas Burner Control	3	0	0	0	0	0	0	0	2	0	1	0	0	0	2	0	1	0	0	1
Odours/smells	3	0	0	0	0	0	0	0	0	1	0	0	3	3	0	0	0	2	0	-4
Engine Oil	0	3	3	3	3	3	3	3	0	0	0	0	3	3	0	0	0	0	1	14
Workshop Vibrations	0	0	0	0	0	0	0	0	2	0	0	2	0	0	2	0	1	0	0	-3
Workshop Dust	2	0	0	0	0	0	0	0	2	0	0	2	0	0	2	0	1	0	0	-1
Electricity Control	0	0	0	0	0	0	0	3	0	0	1	0	0	1	0	0	1	0	0	0
Air Emissions	3	0	0	0	0	0	0	3	0	0	0	0	0	0	0	3	0	2	0	1
Hazardous Waste	1	3	3	3	3	3	2	3	0	0	0	0	3	0	0	3	0	0	1	14
Recycle / Reuse	0	0	0	0	0	0	0	3	0	0	0	0	3	0	0	3	1	0	0	-4
Non Hazardous Waste	0	0	0	0	0	0	0	0	2	0	0	2	0	3	0	0	1	0	0	-4
Workshop Noise	0	0	0	0	0	0	3	3	0	0	0	0	3	3	0	0	1	0	0	-1
Fuel	0	3	3	3	3	3	3	3	0	0	0	0	3	3	0	0	0	0	1	14
Vehicle Wash System	2	3	3	2	2	1	1	3	0	0	0	0	3	3	0	0	0	2	0	9
Vehicle Procurement	3	2	3	3	3	3	3	0	2	0	0	0	3	3	0	0	0	2	0	14

AI = Air Pollution GW = Ground Water SW = Surface Water Contamination SO = Soil Contamination SP = Species Degradation
 HA = Habitat Degradation QL = Quality of Life Degradation
 C = Continuous (daily) Inf = Infrequent (monthly) Occ = Occasional (yearly) L = Low M = Medium H = High

EMF 722.1: CRITERIA FOR DETERMINING SUSTAINABILITY IMPACT / SIGNIFICANCE

A **sustainability** impact is any change (good or bad) in the environment or the community resulting from the Workshops activity.

An impact will be considered as **significant** if it fulfils any one or more of the following criteria:

- a. If the action / task is subject to environmental, health & safety or social policies which could result in legal action being taken against the London Borough of Redbrige (LBR) or the Engineering Workshop.
(Note: Social policies relate to anti-discriminatory or human rights legislation)
- b. If the action / task is subject to environmental, health & safety or social policies, codes of practice or guidelines to which LBR or the Engineering Workshop is required to, or chooses to, subscribe;
- c. If the action / task is likely to have a major negative impact on the environment, wildlife or habitats;
- d. If the action / task is likely to harm human health or cause a nuisance or major public concern to the local community;
- e. If the action / task is likely to result in damage to the cohesion of a community or communities, or cause crime and disorder.

Addendum to EMF 721.1 and EMF 722.1

Risks to be considered during risk identification include, but are not limited to:-

- Will the action / task be subject to specific health and safety, environmental or social legislation?
- Will the action / task require any legal permissions, licences or agreements?
- Will the action / task use goods or employ suppliers or contractors subject to specific legislation or permission in the design or delivery of the project?

If the answer is "YES", then these constitute risks and are to be recorded on the Register of Sustainability Aspects and Regulatory Requirements, measured and managed.

Sustainability actions to be considered

- Does the action reduce emissions to air, water and land including noise or light pollution?
- Does the action reduce solid and liquid waste and increase the re-use and recycling of waste?
- Does the action reduce energy, carbon-based fuel or water demand?
- Does the action improve energy, fuel and water efficiency?
- Does the action protect and create new beneficial habitats and re-introduce native species?
- Does the action reduce demand on the sewerage system?
- Does the action reduce the risk of local flooding?
- Does the action improve access to local services and facilities?
- Does the action reduce traffic congestion and accidents?
- Does the action help the local economy, employment and skills?
- Does the action improve health and wellbeing?
- Does the action reduce crime and disorder?
- Does the action support dis-advantaged people?

If the answer is "NO", then these could constitute risks which need to be measured and managed.

If the answer is "YES" to any of the questions, these constitute opportunities for sustainability to be incorporated into the activity.
No further work is required where the above questions are not relevant to the activity being assessed.

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