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## Table of Contents

1. Objective .....	2
2. Scope.....	2
The scope of the EMS applies to the activities related to the business activities undertaken by BTG Wales (Protherics UK Ltd), and the locations and areas to be covered in the EMS. ....	
3. Definitions / Abbreviations .....	2
4. Associated Documents.....	3
5. References.....	3
6. Revision History .....	3
7. Environment, Health and Safety .....	3
8. Process Flow Map.....	3
9. Policy .....	4
9.1. BTG Wales – Environmental Policy .....	4
10. Organisation.....	6
10.1. EMS Organisation Chart .....	6
10.2. Responsibility .....	6
11. Environmental Management System Requirements .....	8
11.1. Environmental Management System Documents .....	8
11.2. Environmental Policy .....	9
11.3. Planning .....	9
11.4. Environmental Aspects.....	9
11.5. Legal and Other Requirements .....	10
11.6. Objectives, Targets and Programme(s).....	10
11.7. Implementation and Operation .....	11
11.8. Checking .....	13
12. Appendix 1 - Cross Reference of ISO 14001 Requirements and Sections in the EMS Manual and Environmental Procedures .....	17
13. Appendix 2: Water Discharge Consent.....	18
13.1. Introduction – Waste Water .....	18
13.2. Water Volumes.....	18
13.3. Water Quality .....	19
13.4. Access to the Discharge Point.....	19
13.5. Water sample analysis report.....	20

Term/Abbreviation	Description
Environmental Target	Detailed performance requirement applicable to the organisation 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	Person or group concerned with or affected by the environmental performance of an organisation.
Internal Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization are fulfilled.
Nonconformity	Non-fulfilment of a requirement.
Organisation	BTG Wales (Protherics UK Ltd)
Preventive Action	Action to eliminate the cause of a potential nonconformity.
Prevention of Pollution	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental impacts.
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed.

#### 4. Associated Documents

4.1 See appendix 1

#### 5. References

N/A

#### 6. Revision History

- 6.1 All reference to 'Protherics UK Ltd' replaced with 'BTG Wales'
- 6.2 Minor grammatical changes throughout the document.
- 6.3 Names replaced with specific job titles.

#### 7. Environment, Health and Safety

N/A

#### 8. Process Flow Map

8.1 Ref 10.1



- Communicating on all environmental issues, both internal and external;
- Keeping staff aware of environmental responsibilities, commitments, roles, authorities and environmental performance;
- Reporting to senior management on the organisation's environmental performance and the effectiveness of its Environmental Management System.

9.1.5. All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own works, so far as reasonably practicable, are carried out without risk to themselves, others or the environment. This includes co-operating with management on any environment related matter.

9.1.6. BTG Wales will take all practical steps to ensure that potential hazards and risks to the environment are identified and that suitable and effective preventative and corrective control measures are implemented. All employees will be provided with the necessary resources, equipment, information, instruction and training to fulfil the requirements of this policy.

9.1.7. The Site Director has overall responsibility for all environmental matters on the Wales site. The operation of this policy and the associated procedures will be monitored and reviewed on a regular basis to ensure they remain current and applicable to the company's activities, both locally and globally. This policy has been endorsed by the Site Director and the local management team which gives its full support to its implementation.

- Reporting on the performance of the EMS to the Site Director for review and as a basis for improvement of the EMS.

The EHSC, the EHS Committee and Site Director shall undertake the EMS management review annually to ensure management commitment and integration of the EMS with business strategies for its implementation and continual improvement.

#### 10.2.3. Environmental, Health and Safety Committee (EHS Committee)

The Committee is responsible for:

- The establishment and implementation of the EMS;
- The establishment and review of objectives, targets, and programmes;
- Ensuring the effective implementation of environmentally-related operational controls and programmes;
- The internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff;
- The review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- Providing leadership in the pursuit of environmental issues;
- Any other EMS activities that are assigned by the EMR;
- Holding regular meetings.

#### 10.2.4. Management EHS Operations Review Committee

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the Site Director, EHSC, and designated area Managers. This committee will meet on a monthly basis and minutes are recorded. A more detailed annual review will take place in January of every year.

#### 10.2.5. Area Manager

The Area Managers are responsible for:

- Establishing controls for the identified significant environmental aspects for his/her function department according to procedures and instructions;
- Ensuring that the EMS is properly implemented and that environmental matters are properly handled at all stages.

#### 10.2.6. All Employees

All employees are responsible for:

- Working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- Reporting problems or deviations associated with environmental issues and the EMS to the EHS Committee via the established EHS reporting system.



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## 11.2. Environmental Policy

(ISO 14001 Standard Clause 4.2)

- 11.2.1. The environmental policy of BTG Wales is included in Section 2 of this document. It outlines the environmental commitments of BTG Wales with respect to its operations, activities, and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of BTG Wales activities, products and services has been considered. The policy is endorsed by the Site Director and the policy shall be reviewed during the management review meeting.
- 11.2.2. The policy shall stipulate the commitments of BTG Wales to continually improve its environmental management and prevention of pollution. BTG Wales is also committed to comply with applicable legal requirements and other requirements to which BTG Wales subscribes which relate to its environmental aspects. The environmental policy shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented and communicated to all employees of BTG Wales and its contractors.

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## 11.3. Planning

- 11.3.1. BTG Wales shall follow a “plan-do-check-act” process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of BTG Wales Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with BTG Wales environmental policy, BTG Wales objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

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## 11.4. Environmental Aspects

(ISO 14001 Standard Clause 4.3.1)

- 11.4.1. The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, BTG Wales shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects – Legal Compliance Manager Database".
- 11.4.2. BTG Wales shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.
- 11.4.3. BTG Wales shall keep this information up-to-date.
- 11.4.4. Relevant procedure: EHSP 8.035 Environmental Aspects (Legal Compliance Manager)

11.6.7. In the event that objectives and targets in the programmes are not met, the EHSC shall revise the programme as necessary and maintain documented evidence/records for the actions taken to mitigate the problems.

11.6.8. The EHSC shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

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## **11.7. Implementation and Operation**

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11.7.1. The implementation of the EMS requires BTG Wales to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

### **11.7.2. Resources, Roles, Responsibility and Authority**

(ISO 14001 Standard Clause 4.4.1)

Senior management of BTG Wales shall commit to provide resources (including human resources and specialized skills, organisational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

BTG Wales has appointed an Environmental Health and Safety Coordinator (EHSC) for the implementation and maintenance of the EMS. Other employees within the Site Services Department have specific environmental responsibilities.

### **11.7.3. Communication**

(ISO 14001 Standard Clause 4.4.3)

For internal communication, the EHSC shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice board, or is published on the intranet or newsletters.

Employees with enquiries/complaints regarding to the EMS and/or environmental issues of BTG Wales shall inform their area Manager. The designated member of EHS Committee representing each area shall maintain a log for the relevant enquiries/complaints. Depending on the nature and scope of the enquiry/complaint, the EHSC shall determine the corresponding action and maintain relevant records to demonstrate the response/corrective actions taken.

It is the decision of the company not to communicate externally about its significant Environmental Aspects, unless required to do so by legislative act

Relevant procedure: EHSP 8.016 – Off-Site Environmental Complaints



#### 11.7.6. Operational Control

(ISO 14001 Standard Clause 4.4.6)

BTG Wales shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

BTG Wales shall ensure that all operations and activities, carried out by BTG Wales employees or contractors that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Health and Safety Procedures (EHSP) and Environmental Health and Safety Records (EHSR), are communicated to personnel whose tasks may result in significant environmental aspects. BTG Wales shall influence its staff and contractors by communicating its environmental policy and other relevant EHSP and/or EHSR to them.

#### 11.7.7. Emergency Preparedness and Response

(ISO 14001 Standard Clause 4.4.7)

BTG Wales shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

BTG Wales shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

BTG Wales shall also periodically test the procedure and the preparedness where practicable.

Relevant procedure: EHSP 8.005 - Emergency Preparedness and Response

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### 11.8. Checking

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11.8.1. While implementing the EMS, BTG Wales shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

11.8.2. Carbon monitoring will take the raw data from energy usage, transport and fuel costs which will be entered in Carbon footprint Ltd self-assessment webpage and calculated accordingly. This carbon footprint result will be monitored annually and objectives to reduce and offset decided upon at the annual review meeting

#### 11.8.3. Monitoring and Measurement

(ISO 14001 Standard Clause 4.5.1)

BTG Wales shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

Owner(s): Trystan Johns

are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

#### 11.8.7. Internal Audit

(ISO 14001 Standard Clause 4.5.5)

BTG Wales shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- Determine whether or not the environmental management system:
  - conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
  - has been properly implemented and maintained;
- Provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

BTG Wales shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.

Relevant procedure: EHSP 8.032 - Internal Audit

#### 11.8.8. Management Review

(ISO 14001 Standard Clause 4.6)

The “plan-do-check-act” cycle shall require the top management of BTG Wales to act and review the environmental management system periodically to ensure its suitability, adequacy and effectiveness.

Before the review, the EHSC shall schedule for the management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The Site Director, EHSC and area Managers shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, current and planned business activities, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes;
- review of legal compliance and compliance with other requirements (including contractor compliance on BTG Wales’s activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;



## 12. Appendix 1 - Cross Reference of ISO 14001 Requirements\* and Sections in the EMS Manual and Environmental Procedures

ISO Clause		EMS Manual Section	EHSP Ref. No.
4.1	General Requirements	4.1	EHSPS 015
4.2	Environmental Policy	4.2.	POL-EHS-007
4.3	Planning	4.3	EHSPS 015, EHSP 8.035,
4.3.1	Environmental Aspects	4.3.1	EHSP 8.035
4.3.2	Legal and Other Requirements	4.3.2	EHSP 8.035
4.3.3	Objectives, Targets and Programme(s)	4.3.3	POL-EHS-007 EHSP 8.035
4.4	Implementation and Operation	4.4	EHSPS 015
4.4.1	Resources, Roles, Responsibility and Authority	4.4.1	EHSPS 015
4.4.2	Competence, Training, and Awareness	4.4.2	Appraisal system
4.4.3	Communication	4.4.3	EHSPS 015, EHSP 8.016
4.4.4	Documentation	4.4.4	EHSP 8.040
4.4.5	Control of Documents	4.4.5	EHSP 8.040
4.4.6	Operational Control	4.4.6	All SOP, Risk Assessments
4.4.7	Emergency Preparedness and Response	4.4.7	EHSP 8.034
4.5	Checking	4.5	EHSPS 015
4.5.1	Monitoring and Measurement	4.5.1	EHSPS 015
4.5.2	Evaluation of Compliance	4.5.2	EHSP 8.043
4.5.3	Nonconformity, Corrective Action and Preventive Action	4.5.3	EHSP 8.026
4.5.4	Control of Records	4.5.4	EHSP 8.040
4.5.5	Internal Audit	4.5.5	EHSP 8.032
4.6	Management Review	4.6	EHSPS 015

\* ISO 14001:2004 is referred.

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### 13.3. Water Quality

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- 13.3.1. The analytical report includes 2 samples, labelled Sample 1 [Sample Number 79193] and Sample 2 [Sample Number 79194]. The samples were taken several hours apart, but describe consistent characteristics.
- 13.3.2. Generally, the critical elements are of a low order, and as such are unlikely to cause any significant impact on the stream to which they are directed.
- 13.3.3. Because of the very low occurrence of deleterious elements, there is unlikely to be any adverse effects on the flora and fauna associated with Afon Cwerchyr
- 13.3.4. Samples will be taken at regular intervals [not greater than 12 months] to ensure that the water quality remains within any limits defined by Natural Resources Wales.
- 13.3.5. Records of flow and water quality monitoring will be kept on-site and available for inspection.

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### 13.4. Access to the Discharge Point

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- 13.4.1. Access to the discharge point is via a gated path, with firm standing.
- 13.4.2. The path should be kept clear of debris, and maintained in a safe condition for pedestrian access.