



JEMS Environmental Ltd

Environmental Management System

Manual

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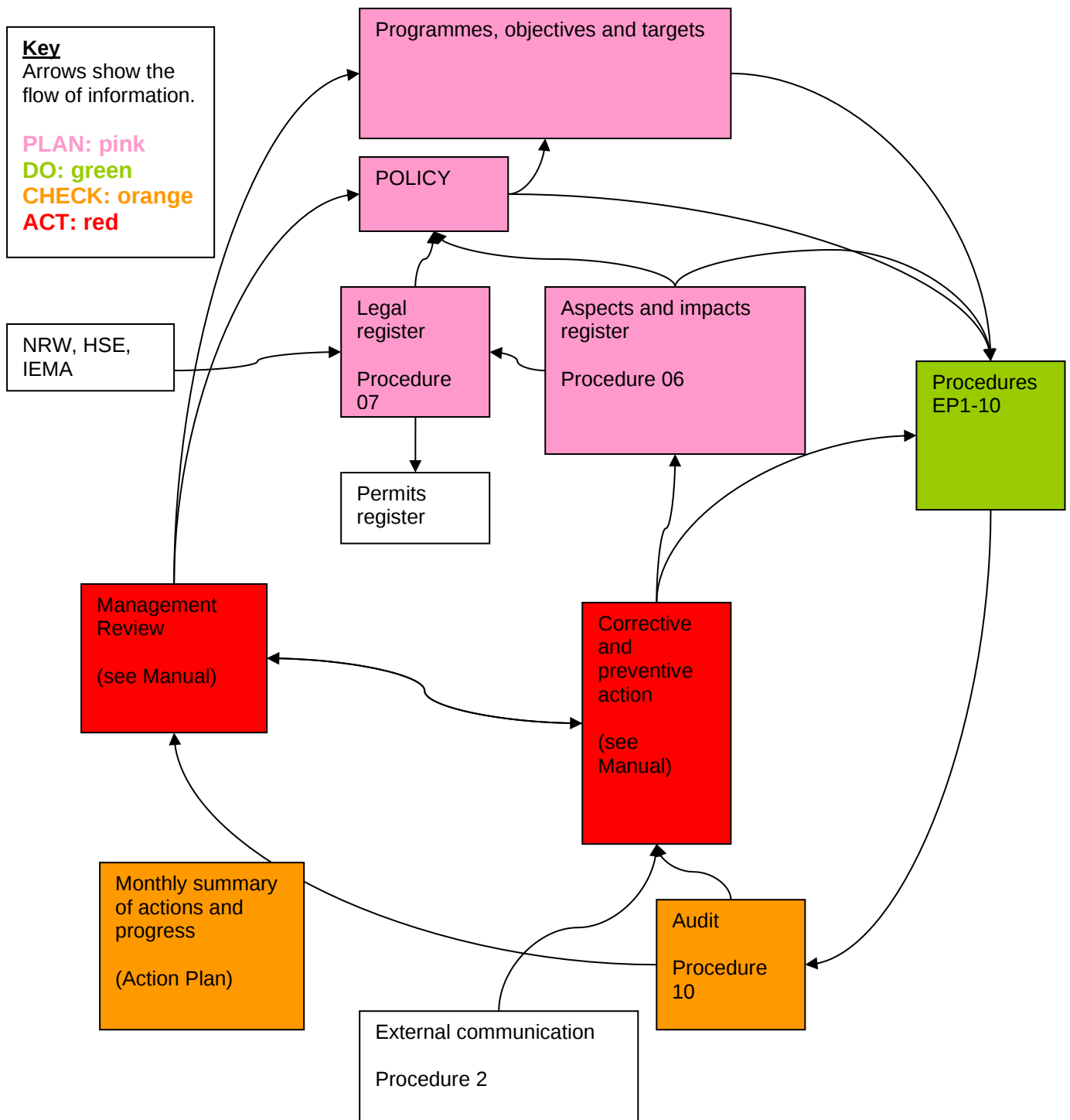
Record of changes

Date	Change	Reason	New issue no.
Jan 2021	New Document	New Document developed for EMS, issued for review and approval	1
Jan 2022	None	Annual Review	2
Jul 2022	Full Review and Update	To comply with operational requirements of Permit at the First Milk ETP	3

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Schematic Overview

Reference: ISO 14001 clause 4.4.4 c: the main elements of the EMS and their interaction and reference to related documents



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Company Context, Site Setting & Organisation

JEMS Environmental are one of the UK's leading environmental engineering companies. Based in South Wales JEMS Environmental consists of a cross functional high performing team which ensures our clients' needs are met to the highest possible standard.

Our Environmental Management system has been developed to be used across all of the sites in which JEMS Environmental operate on behalf of our clients, although every effort is made to ensure our systems cover all aspects of the business, we are very keen to ensure that our Environmental Manual is specific to the site in which we are operating at the time.

This environmental manual is specific to the First Milk Effluent Treatment Plant, located in Merlin's Bridge, Haverfordwest

The First Milk effluent plant is a treatment facility for all liquid waste products related to the operations at the Haverfordwest Creamery, there are no other influent streams entering the site for further processing and discharge.

The site in its basic form comprises of:

- Main influent stream from the creamery which is an underground connection between both facilities this influent stream is connected to a certified MCERTS meter
- Balance tanks and chemical dosing systems for pre-treatment
- Dissolved Air Filtration (DAF) for additional sludge removal
- Aeration lanes with microbiological treatment
- Final discharge via a further MCERTS certified meter

Although the site does have MBR's installed, it was found that although the system was working at a suitable level to meet the permit requirements the quality of the effluent would be improved further by introducing an additional DAF, which not only improves treatment throughout the system but is also a process that is easier to maintain. This has allowed for the MBR system to be removed from service, while still meeting the discharge consent limits identified within the permit.

During the operation of the First Milk Effluent Treatment Plant JEMS Environmental will manage the site in accordance with the requirements of the environmental permit, this will include the daily testing of effluent to ensure compliance with the discharge consent following agreed testing processes outlined within the permit.

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Leadership

Shaun Jones the Managing Director of JEMS Environmental is responsible for ensuring that adequate resources are available within the company, that company policy, procedures, and sound environmental practices are cascaded to all employees, to ensure that they understand their environmental responsibilities and in order that the environmental management system (EMS) is effectively implemented.

At the First Milk Effluent Plant additional day to day operational management has been provided in the form of a site lead who will direct and monitor site activities in support of the Managing Director.

Factors of influence over the JEMS Environmental Management System

Issues relevant to the JEMS Environmental operation are reviewed and assessed as part of the JEMS commitment to continual improvement, each potential environmental impact which may affect our EMS, are identified and recorded.

On operational sites maintained under an environmental permit such as the First Milk ETP, then JEMS environmental will ensure that the aspects and impacts are identified within the clients EMS which has been approved for the purpose of the permit application.

Interested parties (stakeholders) relevant to our EMS are identified in our Interested Parties Register (as well as in our Permits Register and Aspects Register).

In determining the scope of our system we have taken into account wider issues that could have an effect on our ability to achieve the aim of the EMS.

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We also now consider the requirements of stakeholders in this case First Milk and Natural Resources Wales.

The risks and opportunities presented to the business in the light of these issues and stakeholder requirements have been evaluated and are now controlled through the EMS.

Taking the above into consideration, we have determined the scope of our EMS which appears below

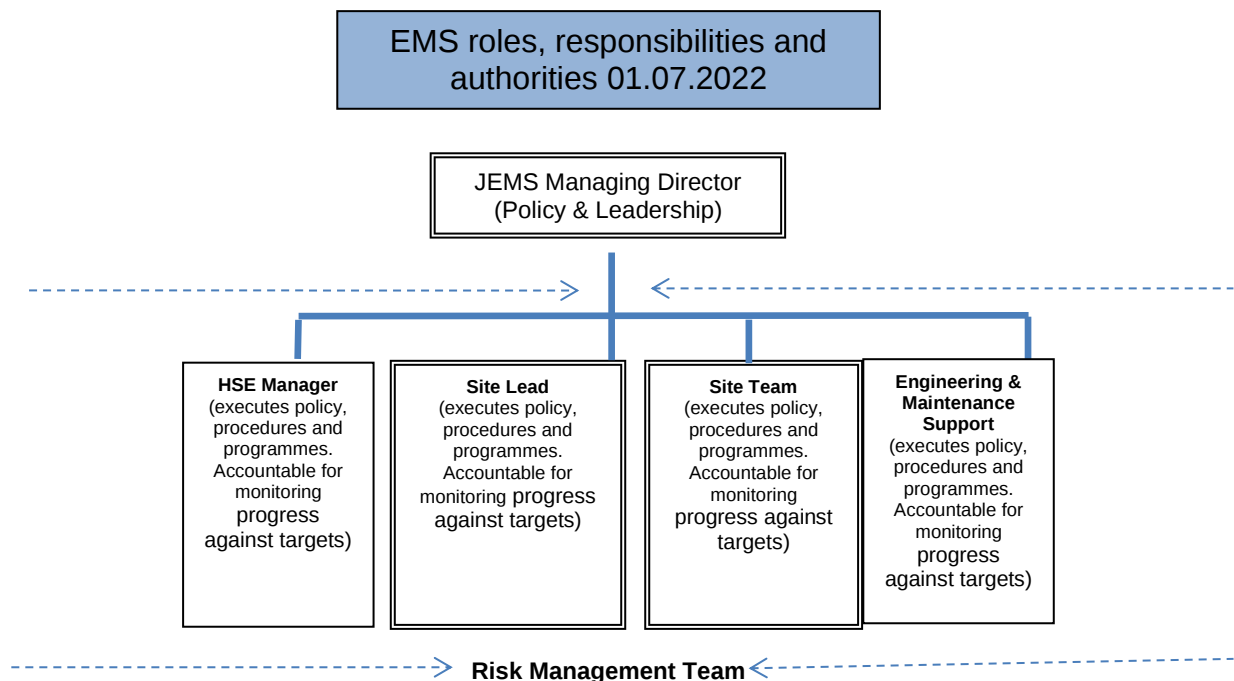


Figure 1: Responsibility for environmental management

The Managing Director (MD) has overall responsibility for the EMS, however he has allocated the maintenance and support of the system to the Health, Safety and Environmental (HSE) Manager.

The responsibilities of the HSE manager includes maintaining and having responsibility for the EMS and associated documents, and also includes the reporting on its performance as part of the Management Review process.

All Employees, contractors, and visitors engaged by JEMS Environmental are responsible for preventing environmental harm.

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Scope & Purpose of Management System

The EMS has been designed to ensure compliance with the JEMS Environmental, Environment Management Policy, and is intended to meet the standard of ISO14001:2015.

The objective of this manual is to specify the requirements for the development and maintenance of the EMS, and to provide an overall description of its operation.

The scope of this Environmental Manual is the environmental management of all operational and maintenance contracts managed by JEMS Environmental on behalf of its clients, this Environmental Manual is specific to the First Milk Effluent Treatment Plant (ETP)

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ENVIRONMENTAL POLICY STATEMENT 2022

JEMS Environmental is committed to environmental protection in all of its business activities; we understand the importance of protecting the environment, conserving energy and natural resources. This environmental document should be viewed in conjunction with the JEMS Environmental health and safety policy.

JEMS Environmental will:

Be an environmentally responsible neighbour in the communities and sites in which we operate, acting promptly and responsibly to correct incidents or conditions that endanger the environment.

Conserve natural resources by wherever possible reusing and recycling materials, purchasing recycled materials, and using recyclable packaging and other materials.

Highlight to our clients, manufacturing processes that do not adversely affect the environment, including developing and improving operations and technologies to minimize waste, prevent air, water, and other pollution.

Ensure the responsible use of energy throughout our business, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy sources when feasible.

Participate in efforts to improve environmental protection; understand and share appropriate pollution prevention technology, knowledge and methods with our clients wherever possible.

Promote our services and expertise to assist in the development of solutions to environmental problems.

Meet or exceed all applicable legislation and voluntary requirements wherever the company does business.

Strive to continually improve our environmental management system and performance, periodically issuing reports which will be available to our clients.

Conduct rigorous audits and self-assessments of our compliance with this policy, and legislation requirements.

Every employee and contractor employed by JEMS Environmental is expected to follow this policy and to report any environmental concerns to Shaun Jones (managing director).

A handwritten signature in blue ink, appearing to read "Shaun Jones", is written over a light blue horizontal line.

Shaun Jones
Managing Director
10th January 2022

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Communication of Policy

This Policy Statement is communicated to all of our employees and customers and is publicly available on request.

It is displayed on notice boards within all operational sites on which JEMS Environmental are engaged, a copy of the policy at the First Milk ETP is present within the main ETP

Policy Review

This Policy Statement and all relevant documentation will be reviewed at least annually, in line with changes in the scale and nature of the Company operations.

Operational Control

The roles and responsibilities of key personnel, which relate directly or indirectly to the JEMS Environmental EMS performance, are outlined previously in *Resources, Responsibility & Authority*.

It is the respective JEMS Environmental employee's responsibility to ensure that all functions performed within their control, are adequately coordinated, and effectively performed, especially those relating to the purchasing of materials and equipment, management of waste on site, spill prevention, control of contractor activity, in-house inspection, monitoring and testing.

The following management procedures define JEMS Environmental requirements in accordance with relevant legislation, EMS Policy, objectives and targets and impact levels: -

Doc No.	Document Title	Doc No.	Document Title
EP01	Emergency Preparedness & Response	EP12	Chemical Unloading Procedure
EP02	Communications	EP13	Tanker Loading Procedure
EP03	Waste Management	EP14	Environmental Objectives & Targets
EP04	Energy Conservation	EP15	Aspects & Impacts Register
EP05	Water Conservation	EP16	Waste License Register
EP06	Environmental Aspect Assessment	EP17	Environmental Management Reviews
EP07	Legal & Evaluation of Compliance	EP18	Introduction and responsibilities
EP08	Training	EP19	Control of HSE Documents
EP09	Monitoring & Measurement	EP20	Control of Contractors & Suppliers
EP10	Internal Audit	EP21	Environmental Emergency Plan

They identify, where relevant, the information to be obtained, sampling, test methods, equipment frequency measurement, and criteria for acceptance and non-conformance actions, records and data handling. They also identify requirements for abnormal or emergency situations where appropriate.

The objective is to ensure that all operations and activities at JEMS Environmental controlled operational sites are carried out under controlled conditions with operating criteria stipulated where relevant.

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Document Control

The EMS comprises this procedure manual, and accompanying documented arrangements relevant to JEMS Environmental activities as follows: -

- Environmental aspects register
- Legal register
- Permits register
- Environmental management programme (with objectives and targets)
- Environmental Systems Procedures - written and flowcharts
- Internal audit reports
- Evaluation of legal compliance
- Training records

All other EMS documentation held on a controlled basis is detailed within the document table.

Changes to documents are reviewed and approved by the Managing Director

When a revision occurs in either the EMS or system arrangements, the Managing Director will ensure that old copies are destroyed, and transfer one copy to archive (held for 12 months).

The release of the EMS manual or system arrangements to external bodies will be at the discretion of the Managing Director

Control of Data & Records

Records are essential to demonstrate the satisfactory operation of the EMS.

All records must be legible and identifiable to the activity involved and held in such a way that they are readily retrievable and in a suitable environment to prevent deterioration, damage or loss. This includes control and protection of relevant electronic data and back up.

Records may be in the form of, but are not limited to, stakeholder communications, waste transfer records, environmental impact assessments, COSHH assessments, maintenance and service records, training records, supplier records, evaluation of legal compliance, audit and incident reports.

Retention times of EMS records will be identified on the Document Register, and release of any records for evaluation by external bodies will be at the discretion of the management team.

The HSE Manager maintains a specimen master copy of each document. These are available on the company IT System. A date and issue number identifies each document. When changes are made to the format of a document, the HSE Manager is responsible for updating the Register and for issuing updated copies. When applicable, obsolete documents are removed from the system.

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Environmental Aspect & Impact Evaluation

The evaluation of the JEMS Environmental impact on the environment and risks associated with its activities, are a key part of the Companies EMS Policy setting and planning.

This activity is carried out on an ongoing basis and, to be effective, is dependent on the commitment and co-operation of all staff, and relevant suppliers (e.g. waste contractors).

The evaluation process covers normal and abnormal operations such as maintenance and emergency situations. It includes the activities of contractors, workplace equipment and facilities, and is also applied to proposed activities where relevant.

The Company Aspect & Impact Evaluation register is updated in the event of a change in legislation, operational location, procedure, raw materials, equipment or personnel and is reviewed annually by Managing Director and HSE Manager.

Legal and Other Requirements

The HSE Manager is responsible for keeping up to date with all changes in relevant legislation, via internal sources such as client issued directions (First Milk), or through external sources such as NRW, Pembrokeshire County Council, IEMA, IOSH, or the HSE.

The HSE Manager is responsible for communicating these changes to the JEMS Environmental team and ensuring they are applied to Company activities.

An up-to-date Register of Environmental Legislation is held by the HSE Manager and stored on the Company IT system.

The Managing Director is ultimately responsible for ensuring effective implementation of all relevant legislation.

New entries to the register must be made as soon as relevant changes in legislation are acknowledged and updated on the Document Register.

The HSE Manager will conduct a full review of the register on an annual basis, to assess its completeness and relevance.

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EMS Objectives, Targets and Management Programme

Environmental Objectives and Targets specific to the JEMS Environmental operations are reviewed annually to reflect the company's Environmental Policy (see previous), and because of the site's aspect assessment.

All objectives are outlined in the Management Improvement Programme.

Each objective is supported by a detailed management program, which indicates the requirements that need to be met and targets delivered, over a defined timescale.

Objectives are always SMART:

- Specific
- Measurable
- Achievable
- Realistic
- Timely

In addition, further objectives may be identified after a review of the aspect assessment and consideration of the financial, operational and business requirements of the company including the views of relevant interested parties.

As a measure of continual improvement and company-wide commitment, representatives have been appointed at the First Milk ETP to monitor and report monthly environmental performance in energy and water consumption, and reduction of waste to landfill.

A summary of the objectives and up-to-date progress against targets is updated and held by the HSE Manager.

Resources, Responsibility & Authority

The Managing Director has overall responsibility for the provision and maintenance of an effective EMS Policy and programme and, in conjunction with JEMS Environmental operational staff ensures that all employees place the Environment in equal measure to customer/quality and safety responsibilities in their day-to-day work.

The JEMS Environmental project team develops and implements annual environmental objectives and targets specific for the project, these will be discussed and where possible be in line with client set requirements for example JEMS will work with First Milk to identify any area where objectives and targets can be included in the set KPIs for the project.

The Managing Director will ensure that a clearly defined Company structure with accountability, responsibility and authorisation is in place at all levels of the organisation in relation to environmental management.

EMS responsibilities of key personnel are communicated to all staff via ongoing training

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Competency, Training & Awareness

JEMS Environmental assigns all EMS requirements to competent personnel who have the necessary expertise, qualifications, training, personality, experience and authority to fulfil their responsibilities.

A site induction has been developed for the First Milk ETP and is provided by the site lead for new staff. This is followed by on-the-job training and more formal specialist training courses in specific subject areas for which a training need has been identified, for example emergency response, internal auditing.

Wherever possible, instruction in relation to EMS requirements will be integrated with other training.

Business needs are constantly monitored to ensure that training is given if needed. Relevant Managers maintain specific training records for each of their staff.

Infrastructure and Work Environment

The Managing Director is responsible for working with First Milk in order to determine, provide, and maintain the infrastructure needed to achieve the necessary service provision, including as applicable: -

- Buildings, workspace and associated utilities
- Process equipment (both hardware and software), and
- Supporting services (specialist expertise)

The ETP Site Lead plans and purchases as necessary the resources to manage the work environment, to conform to operational requirements.

Internal & External Communication

The Managing Director, HSE Manager, and Site Lead at the First Milk ETP are responsible for ensuring that all employees, contractors and visitors are informed and consulted on matters relating to the EMS through meetings, notice boards, company memos.

Areas to cover may include:

- Environmental Policy,
- An outline of the EMS issues relating to the Company and specifically their work area,
- The importance of the environment to JEMS Environmental, and its context in relation to activities of the company
- Individuals' own role within the EMS, and the potential consequences of non-compliance.

Internal EMS communication between specific groups and employees on site may be in the form of incident, complaint, general enquiry, poster, email, memo, and training and is dealt with by the Management Representative.

External communications are logged and will be promptly communicated to the HSE Manager, who will raise all issues internally with relevant JEMS Environmental employees for action.

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It is vital that all external communications are recorded. Communications could come from the regulator in this case NRW or Pembrokeshire County Council, the client First Milk, or potentially a neighbour to the First Milk ETP.

Complaints will be recorded, taken seriously, and dealt with effectively, a complaint or concern will never be ignored, and JEMS Environmental will ensure feedback is given to the relevant people in a timely manner. All complaints will be subject to full investigation, where issues are identified suitable and sufficient controls will be implemented to prevent a reoccurrence, JEMS Environmental operates a lessons learned process, and will always learn from events.

See also External Communication Log.

Emergency Preparedness & Response

Contingency arrangements have been planned for the site in conjunction with First Milk to ensure business continuity, in the event of a major incident, or an incident that may affect the operational processes of the ETP the First Milk site contact will notify JEMS Environmental immediately so that suitable resources can be redirected to the ETP.

All personnel are responsible for taking immediate action following abnormal operation of equipment, fire and spillages, in order to minimise harm to personnel and the environment.

JEMS Environmental risk assessments are made available to all interested parties at the discretion of the Managing Director.

Records are maintained of all incidents and emergency situations by the HSE Manager and include, where appropriate, sketches of the location of the incident and witness statements.

The HSE Manager will conduct a post incident review together with the relevant member of staff or Site Lead, to determine whether existing systems and procedural controls are satisfactory and in order that they may be amended as required.

Incidents are recorded and progressed using an Incident Report Form.

Any incident that may have an impact on the operational status of the ETP will be reported to First Milk, any event which may have, or may lead to a breach of the conditions within the permit will be notified to First Milk immediately.

In the event of a permit condition breach or potential breach, JEMS Environmental will work with First Milk to ensure the event is reported to NRW in the appropriate manner most likely via a Schedule 5 report.

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Performance Monitoring & Measuring

In compliance with Company EMS Policy, identified legislation, operating controls and tracking of objectives and targets, the EMS is monitored by the following means: -

- Environmental impact assessment
- Sampling and EMS Performance Report Statistics
- Test methods
- Non-conformance actions
- Records and Results of Internal EMS Audits
- Complaints / Perception
- Staff suggestion
- Management Review

This activity ensures compliance with management programmes, operational criteria, legislative and regulatory requirements and resulting data are used to determine appropriate improvement action.

All measurement and test equipment are protected from unauthorised adjustment and damage and is verified against external sources as necessary according to a predetermined schedule or at any time that results appear suspect, additional controls are in place for the management and maintenance of the MCERTS certified equipment.

Evaluation of Compliance

A procedure has been created to establish, implement and maintain a system for periodic evaluation of compliance with applicable legal requirements

Incidents, Non-Conformities, Corrective and Preventive Action

In the event of an environmental incident and/or deviation from planned procedures and arrangements, JEMS Environmental ensures that any immediate actions are put in place, and that any longer-term corrective and preventive actions are initiated and completed effectively, so as to prevent recurrence.

Corrective action will be taken, but is not confined to the following situations: -

- A non-compliance with a specific requirement of the Environmental Permit or the First Milk ISO 14001 Certification
- An action contravening a specific system or procedure,
- An observation which indicates an environmental impact not previously identified,
- An incident or accident
- Any other situation that clearly contravenes legislation, Policy statement or objectives and targets,
- Employees being unaware of the environmental impact relating to their work,
- External compliant
- Damage to property and equipment.

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Any member of JEMS Environmental staff can initiate an incident report. The Site Lead will check and approve the relevant corrective and preventive actions that have been taken before raising the issue with the Managing Director and HSE Manager. The Managing Director and HSE Manager will verify completion of identified actions by attending a follow up meeting with the member of staff or Site Lead to close out the non-conformity.

The HSE Manager holds copies of all non-conformity reports to assist in the review of company-wide EMS performance.

Preventive action is also implemented in the form of training, awareness, and continuous personal development of staff.

Internal audits and regular site inspections of the First Milk ETP further reduce the likelihood of incidents.

Internal Audit

The EMS is audited internally at scheduled intervals with the aim of ensuring conformance to company Policy and procedures, relevant legislation, and in accordance with the management programme. Internal audit also has the following important objectives: -

- To ensure that existing controls and procedures continue to provide the most effective means of minimising the likelihood and consequence of environmental risk.
- To ensure that the effects of changing circumstances in terms of EMS issues are controlled.
- To ensure that the EMS meets the requirements of First Milk and the NRW issued operational permit

Audits are scheduled based on the status and significance of the operational area in terms of environmental impact (see Internal Audit Programme).

The HSE Manager compiles the proposed audit schedule and is responsible for its implementation. Areas of significance are audited annually.

Priority audits may be introduced in response to complaint, incidents, or other significant failures within the system.

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Management Review

A management review of the EMS is held annually. Its purpose is to assist the organisation develop a system which will ensure continual improvement in performance.

The agenda is as follows: -

- Review of company environmental policy
- Changes in site arrangements and procedures
- Results of internal audits, impact assessments and status of compliance with legal requirements.
- Communication(s) from external interested parties, including customer feedback.
- Performance against objectives, targets and management programmes.
- Review of incident investigations.
- Follow-up actions from previous management reviews.
- Changing circumstances, including development in product, processes and legal and other requirements related to JEMS Environmental environmental impact.
- Effectiveness of the EMS and recommendations for improvement.

Correspondence table

ISO 14001 Clause No.	Clause Title	Sub Clause	Document Ref.
4.1	General Requirements		Introduction and responsibilities EP18
4.2	Environmental Policy		Environmental Policy Statement
4.3	Planning	4.3.1 – Environmental Aspects 4.3.2 – Legal Requirements 4.3.3 – Objectives & Targets	Identification of Env. Impacts EP15 Document EP07 Legal Register 2022 Objectives and targets document EP14 Strategic Planning (Environmental)
4.4	Implementation and Operation	4.4.1 – Resources, Roles	Introduction & Responsibilities

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		4.4.2 – Training	HSE Training Procedure EP21 Training Matrix
		4.4.3 – Communications	Environmental Communications EP02
		4.4.4 – Documentation	HSE Document Control EP19
		4.4.5 – Control of documents	EP19
		4.4.6 – Operational Control	Product Inventory Control of contractors and suppliers EP20 Waste Management Procedure EP03 Energy Management Procedure EP04 Water Management Procedure EP05 Chemical Discharge Procedure EP12 Tanker collection Procedure EP13
		4.4.7 – Emergency Preparedness	Environmental Accident Procedure EP22 Spill Preparedness Procedure EP01 Emergency Management Plan – JEMS/EMER/001

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4.5	Checking	4.5.1 – Monitoring & Measurement	Measurement and monitoring procedure EP09
		4.5.2 – Evaluation of compliance	Legal Compliance Procedure EP07
		4.5.3 – non-conformity, corrective action & preventative action	Non-Conformance & Corrective Action NCR Form
		4.5.4 – Control of records	HSE Document Control EP19
		4.5.5 – Internal Audits	Internal Env. Audits EP10 Internal Audit Schedule 2022
4.6	Management Review		Environmental Management Review EP17

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Definitions

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 organisation, and for communication of the results of this process to management.

Competence: the demonstrated ability to apply education, training, skills and experience that enable a person to carry out a task in a manner that meets specified criteria and/or a performance standard successfully.

Continual Improvement: process of enhancing the environmental management system to achieve improvements in overall performance in line with the organisation's policy.

Environmental Aspect: Element of the Company's activities which can interact with the environment.

Environmental Impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the Company's activities.

Incident: event that gave rise to an accident or had the potential to lead to an accident

Interested party: individual or group concerned with or affected by the environmental performance of an organisation.

Non-conformance: any deviation from work standards, practices, procedures, regulations, management system performance, etc. that could either directly or indirectly lead to harm to individuals, property damage, damage to the workplace environment, or a combination of these.

Objectives: goals, in terms of the environmental performance, that an organisation sets itself to achieve.

EMS: environmental management system that facilitates the management of the environmental impact associated with the organisation's activities. This includes the organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the organisation's environmental policy.

Performance: measurable results of the management system, related to an organisation's control of risk, based on its policy, objectives and targets.

Prevention of Pollution: use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatments, process changes, control mechanisms, efficient use of resources and material specifications.

Waste: loss of value, whether in terms of efficiency or value to the business.

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