FORTIS

Preserving our Natural Resources

Environmental Management System

Manual

Issue No. 6

August 2023

Contents

2. Amendment List

Version	Date	Details of Amendment
Issue 1	01/05/2015	Initial issue. EMS developed to meet the requirements of BS EN ISO14001:2015
Issue 2	09/10/2018	Change of wording in 9.3 – changed quarterly reviews to annual with option of monthly.
Issue 3	01/08/2019	Procedure references updated to reflect new integrated management system procedures
Issue 4	22/09/2020	Annual review. Changes made to streamline against QP manual and Fortis HS and Quality manuals.
Issue 5	25/01/2022	Annual review. Minor formatting changes.
Issue 6	29/08/2023	Annual review. Minor formatting changes. Updated QCL & T&E Manager to Group Quality & Technical Manager.

2. Introduction

Fortis IBA is the Incinerator Bottom Ash (IBA) processing division of Raymond Brown Minerals and Recycling Limited (RBMR). It was formed in 2016, following a management buyout of RBMR from Raymond Brown Group. RBMR had previously been processing IBA since 2008.

Fortis operate at a variety of locations around the United Kingdom, providing a waste processing service to multiple customers in the municipal incineration industry. In turn, the main process creates pre-separated metal streams for the metal recycling industry and Incinerator Bottom Ash Aggregate (IBAA) supply for the construction and civil engineering industry.

Fortis is dedicated to the continual improvement of its processes; regularly reviewing outputs and opportunities for technological improvement to ensure maximum recycling and recovery of metals is achieved.

3. Distribution and Revision

This manual is a controlled document within the Environmental Management System. The controlled master copy is maintained on the companies electronic file management system EQMS. There are no other controlled copies. Uncontrolled copies can be printed when required, however they are only current at the time of printing and will not be updated.

The *Group Quality & Technical Manager* has overall responsibility for the review and revision of this manual. All amendments to this document are recorded in the table within section 1 (Amendments).

4. Organisation

4.1 The organisation and its context (business environment)

In order to establish, implement, maintain and continually improve our EMS Fortis shall determine the context within which it operates. This context includes external and internal issues, environmental conditions relevant to our mission statement that affect our ability to achieve the intended outcomes of our EMS. We recognize that we do not operate in isolation, but are influenced by external and internal issues including the availability of recourses and the involvement of employees. This also includes our organisational structure, activities and geographical locations. The context also includes the natural environment in which we operate, both existing conditions and events which can affect our activities, products and services.

Applicable procedure MSP01 Context

4.2 The needs and expectations of the organisation

Workers and interested parties are part of the context in which Fortis operate and are required to be considered when reviewing our context.

Fortis shall determine its interested parties and their needs and expectations relating to the EMS. By identifying the relevant needs and expectations of relevant interested parties we can determine those that we are legally obliged to comply with and those we choose to comply with.

For identified internal and external interested parties we shall gain an understanding of their expressed needs and expectations which have been determined as relevant, so that they can be considered when determining our compliance obligations.

Applicable procedure MSP02 Interested Parties, Needs and Expectations

4.3 The scope of the environmental management systems

The scope of our EMS shall clarify the physical, functional and organisational boundaries to which it applies. This shall be achieved in determining the boundaries and applicability of our EMS and understanding the context of our organisation and the needs and expectations of interested parties. Understanding the physical boundaries of our operations, and organisational sphere of control and influence considering the life cycle shall also be taken into consideration in determining the scope of our EMS.

The scope of the management system includes the operation of IBA processing facilities including the site offices and separate administration centres.

4.4 Environmental management system

Our EMS shall provide an organising framework that will be continually monitored and regularly reviewed to ensure direction to our response to changing external and internal issues.

The model for our EMS and the ongoing process of continual improvement shall adopt the Plan-Do-Check- Act (PDCA) approach which is illustrated in Figure 1.

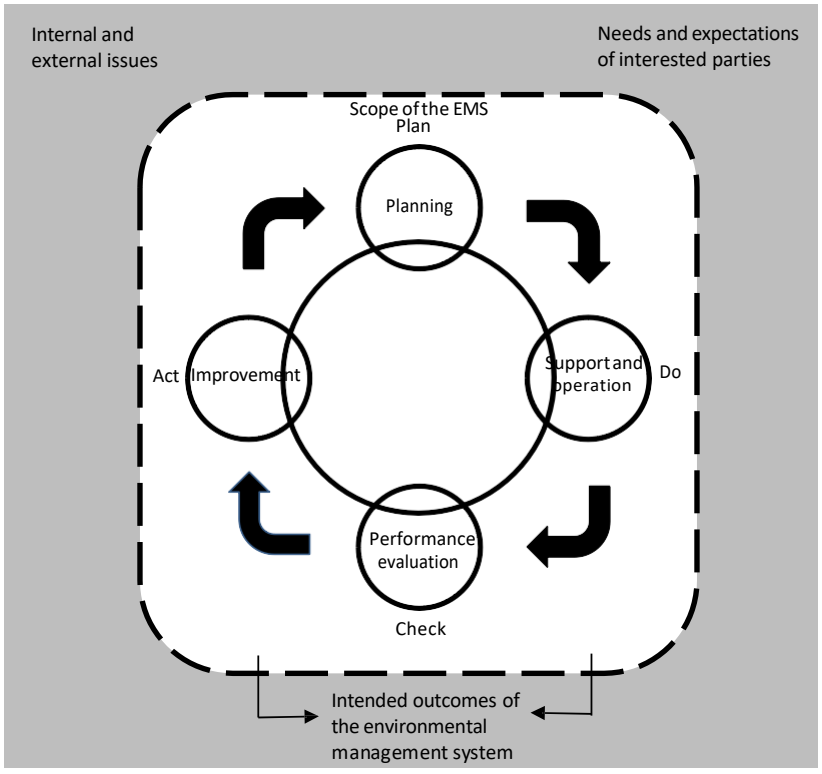

Figure 1 Environmental management system model

The interactions of our EMS processes within the PDCA model are illustrated in Figure 2 overleaf.

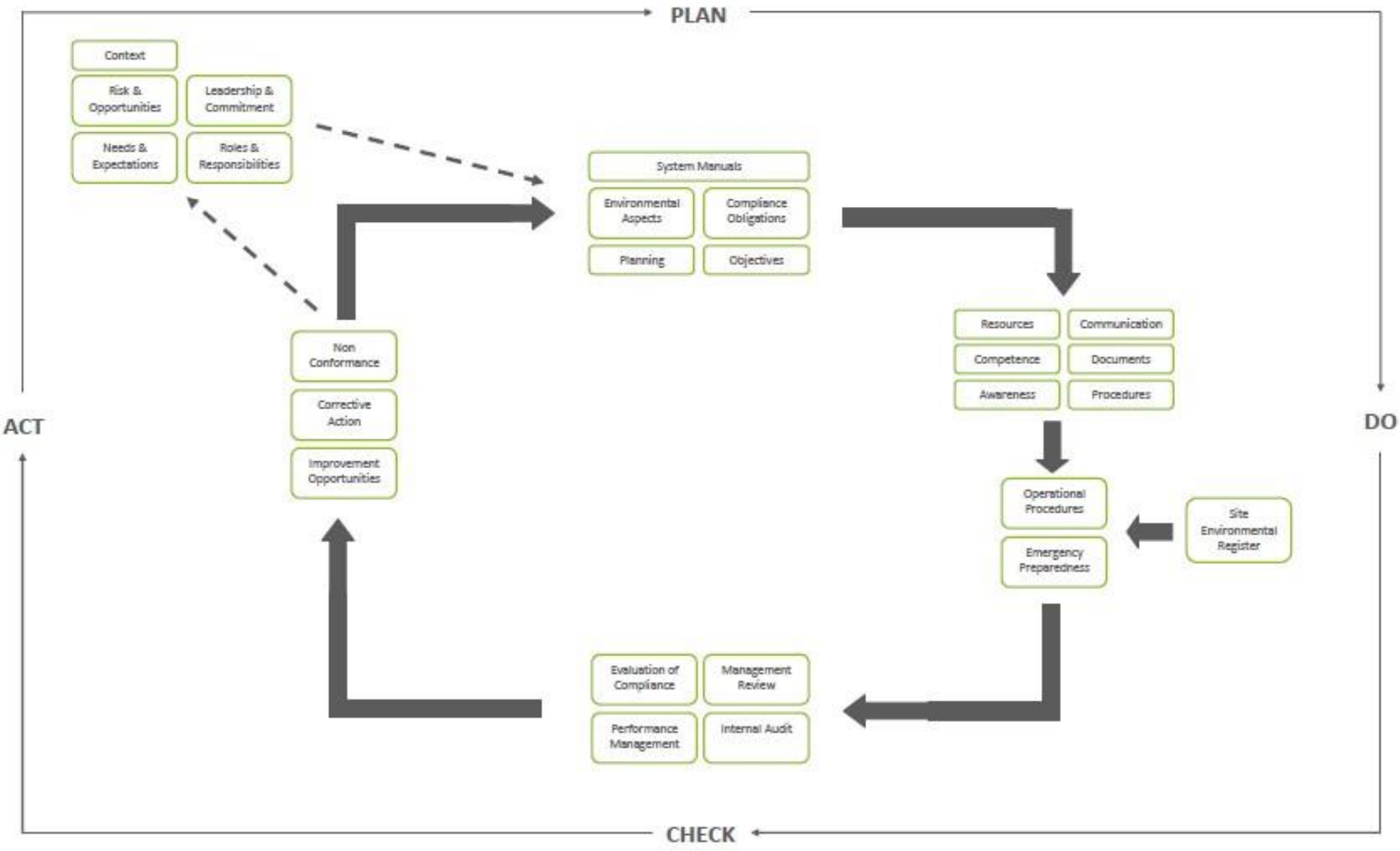

Figure 2 – Interaction of the processes

By establishing, implementing, maintaining and continually improving our EMS we shall achieve its intended outcome. In particular performance knowledge gained from understanding our organisation and the context and the needs and expectations of interested parties shall enhance environmental performance.

A variety of processes are required, through the EMS, for the successful operation of the business. These are split into two types;

- individual on-site processes and central processes, which are explained through management system procedures, process control manuals, and
- individual central processes, which are explained through management system procedures, documents and operational control procedures.

An overview and interaction of these business processes is documented in MSF1.6 (Business Processes) and MSF1.7 (Process Interaction). The environmental documents, environmental procedures and the site process manuals are listed and available in the EQMS system.

5. Leadership

5.1 Leadership and commitment

Mission statements, vision statements and core values considering the context (business environment), the needs and expectations of interested parties and business objectives shall be set by the Directors as part of the company's strategic plans. The Directors commitment, accountability and leadership are vital for the successful implementation of our EMS. This commitment means providing physical and financial direction, resources and active involvement that supports the EMS and communicates the importance of effective management.

This commitment shall ensure that the EMS

- is not managed in isolation or separately from the core strategy of the business is considered when strategic business decisions are made
- is aligned with business objectives
- receives the appropriate levels of resources
- receives the appropriate involvement across the business provides value to the organisation
- continually improves in the long term

The importance of effective environmental management and conformance to the EMS requirements shall be communicated through direct involvement by Senior Management and through the delegation of authority to the Group Q&T Manager.

The Senior Managements aim to create a culture that encourages employees at all levels to actively participate in the EMS to assist in the achievement of environmental objectives and identifying opportunities of improvement.

Applicable procedure MSP03 Leadership and commitment.

5.2 Environmental policy

5.2.1 Establishing the environmental policy

Our environmental policy defines the strategic direction of the organisation with respect to the environment within the defined scope of our EMS. It shall provide a framework for establishing environmental objectives and set levels of responsibility and performance.

5.2.2 Communicating the environmental policy

Senior management are responsible for establishing and implementing our environmental policy. It shall be communicated to all persons working under our control and made available to all interested parties.

When re-issued it is communicated to staff and made available to all interested third parties. The controlled copy is stored on the EQMS system.

5.3 Organisational roles, responsibilities and authorities

Successful establishment, implementation and maintenance of our EMS and improvement of our environmental performance requires top management to clearly define and assign responsibilities and authorities within the organisation. These roles must carry sufficient authority, awareness, competence and resource to ensure:

- The establishment, implementation and maintenance of the EMS at all levels of the organisation

- Report back to top management on the EMS, environmental performance and opportunities for improvement.

The management structure for the company is detailed in procedure MSP04. Responsibilities and authorities of persons working under the control of Fortis whose work affects the EMS are to be clearly defined and communicated within the company.

These responsibilities and authorities shall be reviewed when a change in the organisation structure occurs.

Applicable procedure MSP04 Organisation and Responsibilities

5.4 Consultation and Participation of Workers

Fortis shall establish, implement and maintain a process for the consultation and participation required by workers affected by our activities to ensure the effective implementation of the EMS. This includes the provision of site health and safety meetings which include environment on the agenda.

Appropriate worker consultation is required for EMS development, planning, implementation, performance evaluation and improvement.

Appropriate worker participation involvement includes;

- determining mechanisms for consultation and participation
- identification of potential nonconformities and assessing risks and opportunities
- determining actions to eliminate reduce risk of nonconformities
- determining competence requirements, training needs, training and evaluating training
- determining communication methods and content
- determining control measures and their effective implementation and use
- investigating nonconformities, identifying root cause and implementing corrective and preventative actions

Applicable procedures MSP10.2 Site Safety Meetings

6. Planning

6.1 Actions to address risks and opportunities

6.1.1 General

Planning is required to ensure our EMS achieves its intended outcomes. Our planning process shall be used to establish, implement, maintain and improve our EMS based on inputs into the system and changing circumstances. It shall identify and provide resources to the areas that are most important for the protection of the environment. This process will also assist the company in fulfilling our compliance obligations, our environmental policy commitments and achieving our environmental objectives.

We identify three sources of risk and opportunity that need to be addressed in order to ensure that the EMS can achieve its intended outcomes:

1. Environmental aspects

2. Compliance obligations
3. Other issues and requirements (in connection with the context of the organisation and understanding the needs and expectations of interested parties).

When determining and addressing risk shall include the following:

- Significant environmental aspects
- Non fulfilment of compliance obligations
- Environmental conditions
- Customer needs
- Views of interested parties
- Consideration of unintended outcomes
- Environmental aspects

When determining and addressing opportunity shall include the following:

- Resource conversation
- Working with interested parties
- New technology

Applicable procedure MSP05 Risk & Opportunity

6.1.2 Environmental Aspects

For our EMS to be effective we shall develop an understanding of how we interact with the environment. The activities of our organisation which interact with the environment are called **environmental aspects**. These may include for example a discharge, an emission, use or reuse of material, or generation of noise.

Our EMS shall allow us to determine the environmental aspects that we can control or have influence. These environmental aspects need to be considered from a life cycle perspective.

Changes to the environment can be either adverse or beneficial. These changes that result wholly or partially from our environmental aspects and called **environmental impacts**. Examples of adverse impacts include pollution of air and depletion of natural resources. Examples of beneficial impacts include improvement in recycling rates and preserving natural resources.

Our EMS shall provide for the identification and understanding of those aspects that can have a significant impact on the environment. Determining significant environmental aspects and associated environmental impacts shall allow Fortis to determine where control of improvement is needed and to set priorities for action.

Life cycle perspective.

Our activities, products and services have impact on the environment which can occur at any or all stages of the life cycle. We shall identify those activities, products and services that fall within the scope of our EMS in order to identify the associated environmental aspects and environmental impacts.

Determining environmental aspects.

In determining the environmental aspects that fall within the scope of our EMS they are to be considered using the life cycle perspective. Consideration shall also include past, current and planned activities, products and services. When evaluating our ability to influence the identified environmental aspects consideration shall be given to identified compliance obligations, policies and site specific issues.

Applicable procedure MSP05.2 Environmental Aspects and Impacts

6.1.3 Compliance obligations

Compliance obligations can result in risks and opportunities that will need to be addressed. By understanding how they apply to Fortis we shall ensure we fulfil our compliance obligations. We shall determine at a sufficiently detailed level our compliance obligations identified in EP4.2 (Understanding the needs and expectations of interested parties) that are applicable to our environmental aspects and how they apply to the company.

Fortis shall also consider and prepare for new or changing needs from interested parties so that preparatory actions can be taken to maintain conformity. Consideration shall also given to how planned or new developments and new or modified activities, products or services can affect or compliance status.

Fortis shall ensure that appropriate information about compliance obligations is communicated to persons working under our control (including contractors) whose responsibilities relate to, or whose actions can affect, fulfilment of compliance obligations.

Applicable procedure MSP05.1 Compliance Obligations

6.1.4 Planning action

Our EMS shall provide for us to plan and take action to address the identified significant environmental aspects, compliance obligations and risks and opportunities. We shall also determine the effectiveness of actions taken.

Planning to take action may include establishing an environmental objective, operations controls, emergency preparedness and other business processes. Technological options, feasibility, financial, operational and business requirements may all be considered. The potential for any unintended consequence shall also be considered.

Methods shall be established for evaluating the effectiveness of actions taken against expected performance levels.

Applicable procedure MSP06 Planning

6.2 Environmental objectives and planning to achieve them

Environmental objectives shall be established with the aim of fulfilling our commitment to our environmental policy. The process of establishing and implementing environmental objectives shall provide for improvement in environmental performance.

6.2.1 Environmental objectives

Environmental objectives shall be established with the aim of fulfilling our commitment to our environmental policy. The process of establishing and implementing environmental objectives shall provide for improvement in environmental performance.

When establishing our environmental objectives we shall consider:

- The principles and commitments of our environmental policy
- Needs and expectations of interested parties and workers

- Significant environmental aspects
- Compliance with standards, obligations and other applicable requirements
- Risk and opportunity
- The effect of achieving environmental objectives on other activities and processes
- Effects on public image and reputation
- Environmental reviews
- Other company objectives

Environmental objectives shall be established by top management with involvement at other levels where activities important in achieving the environmental policy commitments are carried out.

Environmental objectives shall be consistent with our environmental policy commitment to the protection of the environment, prevention of pollution, fulfilment of compliance obligations and continual improvement.

Environmental objects may be set as a specific performance level or expressed in a more general manner with targets. Where targets are set they shall be measurable and include a specific time frame. They can be applicable across the company or to site specific activities.

Persons involved in and their responsibilities for achieving objectives shall be identified.

Communication of our environmental objectives will assist in our ability to achieve them. Documented information on our environmental objectives shall be provided to those responsible for achieving them and to other personnel who need such information to carry out related functions.

6.2.2 Planning actions to achieve environmental objectives

Programs for achieving our environmental objectives shall be established. This program shall identify role, responsibilities, resources, timeframe, priorities and actions required for achieving the environmental objectives. The program shall be dynamic adjusting to changes in process, activities services and products accordingly within the scope of our EMS.

Fortis shall establish a set of environmental performance indicators for monitoring progress in achieving our environmental objectives and continual improvement. These performance indicators shall be appropriate to our activities, products and services consistent with our environmental policy and produce objective, verifiable and reproducible results.

Applicable procedure MSP16.1 Management Objectives

7. Support

7.1 Resources

Resources shall be provided for establishing, implementing, maintaining and improving our EMS. In determining the resources required we shall consider

- Human
- Infrastructure
- Operational environment
- Monitoring and measuring resources
- Organisational resources (including information systems, finances, technology)
- Capabilities and constraints on existing internal resources (including competence)
- Externally provided resources (including reviewing Fortis requirements)

- Other resources specific to our activities, products and services

These resources shall be provided in a timely manner. The adequacy for resources shall be reviewed on a regular basis where consideration shall be given to present and future needs including planned changes and/or new projects or operations. The resources required by each operational site have been determined and detailed individually within their process control manual.

Applicable procedure MSP07 Resources

7.2 Competence

7.2.1 Organisational Knowledge and Competence

Organisational knowledge is knowledge specific to Fortis regarding aggregate manufacturer operations and associated processes necessary to achieve conformity of products and services and achieve management objectives.

Organisational knowledge is determined by Senior Management and is generally gained by experience, can be derived from both internal and external sources and is maintained, used and shared to all employees and interested parties as necessary. When addressing changing needs and trends, Fortis shall consider its current knowledge and determine how to acquire or access any necessary additional knowledge and required updates.

Fortis operates in a transparent and honest environment which safeguards organisational knowledge from staff turnover and the failure to capture and share information. Fortis employees are encouraged to gain organisational knowledge by learning from experience, mentoring, benchmarking, work shadowing and informal and external formal training.

Competency is a combination of sufficient training, education, knowledge and other qualities to enable the undertaking of responsibilities and performance of activities to a regular standard on a regular basis.

All persons undertaking work that affects or can affect our quality performance, including our ability to fulfil requirements and the effectiveness of the QMS, shall be competent as determined by Fortis. These requirements are applicable to employees and others working under our control including contractors. Fortis will retain appropriate documented information as evidence of competence.

Competency requirements necessary to achieve the intended outcomes of the QMS applicable to each role shall be identified. This is to ensure that persons understand the potential nonconformities involved and are aware of the consequence of their work activity and behaviour and the requirement for suitable and sufficient control measures for the tasks they are required to perform. Fortis is committed to the on-going training of all employees who have an influence in quality. Documented information shall be used to ensure competency needs are addressed, progress of actions (including education, training and mentoring) is tracked to evaluate effectiveness and competency obtained, and on achieving competency the relevant communication and information is retained and made available to interested parties.

Applicable procedure	**MSP09**	**Competency Management**
	MSP09.1	**Competency – Site Training Matrix**
	MSP09.2	**Competency – Additional Training**

External contractors and suppliers will be competent to carry out the role or task required of them. In general terms this means that they hold qualifications related to their job role, which are recognised by the company. In some cases experienced persons can carry out roles, however this is at the discretion of the relevant function manager

and must be recorded. The competence setting of central function staff is the responsibility of the relevant manager.

The competence setting of contractors and suppliers is the responsibility of the site manager and is detailed in the Site Process Manual.

7.3 Awareness

The Senior Management have the responsibility for building awareness in relation to the EMS and environmental performance in order to enhance knowledge and promote behaviour that supports our environmental policy commitments. This awareness includes ensuring employees and other persons working on behalf of the company understand our environmental values and how they contribute towards our business strategy.

Environmental awareness is promoted throughout all levels of the company by integrating it with all business activities. The awareness of the Environmental Policy, risks and actions; requirements, their contribution to the effectiveness of the EMS (including benefits of improved performance) and the implications of not conforming to it are presented to Fortis employees during their induction. Employees and contractors/ supplier (where applicable) shall be made aware of nonconformities and the outcome of investigations that are relevant to them. Employees are also given Toolbox Talks periodically throughout the year, including an annual briefing on the objectives for the year ahead. Environmental awareness is measured by audits, inspections and engagement visits by Senior Management.

7.4 Communication

7.4.1 General

Fortis shall establish a communication process within our EMS relevant to our compliance obligations. This process shall identify

- What information needs to be communicated
- When or under what circumstances it needs to be communicated
- To whom it needs to be communicated *(including employees, contractors, visitors and interested parties)*
- Method for communication

The approach and methods used for communicating information shall be defined and be appropriate for the particular circumstance as required. Communicated information shall be relevant to obligations, reliable and consistent with the information generated within the EMS. It shall also include arrangements for receiving and responding to internal and external communications. The requirement for the documentation and recording of information shall be determined taking into account its significance.

7.4.2 Internal communication

Communication between the levels and functions within the company are essential to the effectiveness of the EMS. The provision of clear information to those working under our control shall encourage acceptance of our efforts to improve our environmental performance.

7.4.3 External communication

Communication requirements of information associated with our EMS shall be determined and information provided externally as required. Requirements for communicating externally to interested parties regarding

relevant information on environmental aspects shall also be established. A defined process for the communication with external parties in the case of emergency situations that may affect or concern them shall be implemented.

Applicable procedures MSP10 Communication
MSP10.1 Site Induction
MSP10.2 Site Safety Meetings
MSP10.4 Tool Box Talks, Safety Alerts, Reminders and Briefings
MSP10.5 Site Safety Notice Boards

8 Documented information

General

Fortis shall develop and maintain adequate information to ensure that our EMS is operating effectively, is understood by persons working under our control and other interested parties and that the processes associated with our EMS are carried out as planned.

Documented information may refer to any manual, policy, procedure, form or document created or adopted for the purpose of operating the Environmental Management System and shall be maintained to ensure consistency, timeliness and repeatability of outcomes. All documentation established by the EMS is stored electronically in the document management section of the EQMS system. Controls are required to prevent any unauthorised changes or unintended loss, and to ensure they are up to date and meet requirements of the management system standard. EQMS has role dependant security and is open to all users. Completed environmental forms and reports (records) are accessed and stored within the document filing system. This has read and write access granted on a user type basis to maintain security.

Documented information in the form of records shall be retained as evidence of the results achieved or activities performed in order to demonstrate effective implementation of our EMS.

For the effective management of key activities we shall establish documented Operational Controls to describe how to carry out the activities and describe in appropriate detail how they are to be managed. Where a key activity process is not documented affected persons shall be informed of the requirements to be met through appropriate communication and training.

Our EMS shall be documented as follows:

EMS Manual An overview of the system describing the main elements and direction to related documented information

Policy Statement Our statement of intent and commitment on how the company will address environmental matters

Procedures Documented procedures shall describe each process in detail. The procedures are structured as follows:

Approach A paragraph describing what the procedure is setting out to achieve.

Responsibilities Identification of the person(s) responsible for undertaking the process.

Related documents Refers to the forms described in the procedure and any other related procedure.

Method Flow charts shall be used where applicable to describe the process.

Forms Forms are the documents where objective evidence (records) are maintained to confirm that the requirements of the EMS have been achieved.

Appendix 1 provides a list of the procedures referred to above.
Creating and updating

Documented information relating to our EMS shall include;

Identification and description (title, reference number, date, and optionally author)
Format and media
Internal review and approval for suitability and adequacy

Control of documented information

Documented information shall be controlled to ensure;

Information can be identified with the appropriate organisation, division, function and activity.
Information is regularly reviewed, revised as necessary and approved prior to issue.
Current versions of relevant information are available at locations with obsolete information promptly removed from all points of issue and from places and situations of use.
Documented information shall be controlled by;

Using a standard template that includes a unique title, reference number, date, revision, revision history and authority.
Review and approval of documented information by individuals with sufficient capability and authority.
Maintaining an effective distribution system.

Issued documentation (documents, procedures, blank forms and guidance) relating to the QMS is stored on the EQMS. It is a secure permission based, management systems platform used by Fortis for the storage, version control and access for all controlled documents. It is based on a web server outside of the company facilities which is backed up in multiple locations. Other information, including records pertaining to the QMS, are accessed and stored within the HSQE document filling system which has a read and write access granted on a user type basis to maintain security.

Applicable procedures	**MSP12**	**Documented information**
	MSP12.1	**Documented Information - Records**

9 Operation

Operational planning and control Operational control
In order to ensure the fulfilment of the commitments of our environmental policy, achieve our environmental objectives, manage our significant environmental aspects, compliance obligations and risks and opportunities we shall ensure that our operations are conducted in a controlled manner.

To plan for effective and efficient operational controls we shall identify where such controls are needed and for what purpose. We shall establish the types and levels of controls and ensure such controls are maintained and periodically evaluated to provide for their continuing effectiveness.

Plans and controls for onsite processes are detailed in the relevant Process control manual and controls for central processes are detailed in procedures where required. Product specification documents are also used to plan and control product processes, and are controlled on EQMS.

When determining controls or considering changes to existing controls consideration shall be given to risks and opportunities that need to be addressed and to any unintended consequences that could result.

Plans and controls for onsite processes are detailed in the relevant Process control manual and controls for central processes are detailed in procedures where required. Product specification documents are also used to plan and control product processes, and are controlled on EQMS.

When determining controls or considering changes to existing controls consideration shall be given to;

The sequence and criteria of activities and process to be carried out
Risk and opportunity
Controls required and implementation
Resources
Qualifications of personnel involved
Key variables that should be kept within certain limits
Documented information – procedure and records
Measuring, monitoring and evaluation – has operating criteria been met
Potential unintended consequences and mitigation opportunities

Methods for the development of controls shall, for example, use the hierarchy of control measures either individually or a combination of:

Eliminating the hazard
Substitute with less hazardous processes, operations, material or equipment
Use engineering controls and reorganisation of work
Use administrative controls, including training

Identifying needs for operational controls

Operational controls shall be used for managing significant environmental aspects, ensuring fulfilment of compliance obligations, achieving environmental objectives, ensuring consistency with our environmental policy, avoiding or minimising adverse impacts to the environmental or adverse effects to the company and to maximise opportunities.

Operational controls shall extend t external providers and outsourced processes that can affect our ability to manage our environmental aspects and to fulfil our compliance obligations.

Establishing operational controls

Operational controls shall take the form of documented procedures, work instructions, physical controls, competent personnel or any combination of these. These controls shall include provision for measurement, monitoring and evaluation and for identifying whether operating criteria has been met.
Operation controls shall be monitored to ensure the effectiveness of their continuing application and to plan for actions where needed to maintain compliance.

Emergency preparedness and response

Plans shall be developed, implemented and practiced to respond to reasonably foreseeable emergency

situations. These plans shall consider both the initial environmental impact and any secondary environmental impact that may occur as a result of responding to the initial environmental impact.

Emergency plans shall prepare for different types of situations and small scale events to serious environmental incidents.

Applicable procedures	**MSP13.1**	**Emergency preparedness**
	MSP13.2	**Public relations following a major incident**

10 Performance evaluation

Monitoring, measurement, analysis and evaluation

General Performance Evaluation

Fortis shall apply a systematic approach to monitoring, measurement, analysis and evaluation of our environmental performance and EMS effectiveness. This includes the identification of requirements, methods, frequency and result interpretation. Monitoring and measuring shall be undertaken on a defined regular basis in order to accurately document, report and communicate on our environmental performance and EMS effectiveness both internally and externally to interested parties as required.

Monitoring shall refer to processes where observations are made over time without necessarily using monitoring equipment. Measurement refers to processes where equipment is typically used to determine quantitative and qualitative properties. Therefore, additional controls to ensure the calibration of such equipment may be required.

The requirement for monitoring and measurement shall be determined from our environmental commitments and objectives, compliance obligations and requirements, and operational controls including identifying potential nonconformities, risks and opportunities. Relevant indicators shall be established that provide information for evaluation of our environmental performance and appropriate to our environmental commitments.

Monitoring and measurement shall be conducted under controlled conditions with documented processes on calibrated or verified equipment to assure validity of results. Where external providers or laboratories are used testing techniques shall have been either accredited by a national accreditation body or approved regulator. Documented information shall be retained as evidence of the monitoring, measurement, analysis and evaluation of results.

Results from monitoring and measuring shall be analysed to identify nonconformity, adherence to limits specified by compliance obligations, performance trends and opportunities for continual improvement.

The Performance Evaluation Register (MSF1.10) details the aspects and processes that Fortis has determined require measuring or monitoring, how, when and why.

Applicable procedures	**MSP14**	**Monitoring, Measurement, Analysis and Evaluation**
	MSP14.1	**Control of Monitoring and Measurement Devices**
	MSP15	**Audits**
	MSP15.1	**Site Systematic Inspection Scheme**

11 Evaluation of compliance

Fortis shall establish a process to evaluate the extent to which our compliance obligations are fulfilled. This

process shall help the company demonstrate our commitment to fulfil compliance obligations, understand our compliance status, reduce the potential for regulatory violations and avoid adverse action from our interested parties. Evaluation of compliance against our compliance obligations shall be undertaken a defined intervals.

Evaluation of compliance shall use the output from other areas of the EMS to determine whether the company is fulfilling its compliance obligations.

Note: Although internal audits can be used to determine the effectiveness of the processes established and implemented to fulfil our compliance obligations they will not be used on their own used to demonstrate compliance obligations have been fulfilled.

Where a failure of potential failure to fulfil a compliance obligation has been identified action is to be taken using our non-conformity and corrective action process. Where required the failure to fulfil compliance obligations shall be reported to the relative interested party.

Applicable procedures ***MSP14*** ***Monitoring, Measurement, Analysis and Evaluation***
MSP14.2 **Evaluation of compliance**

12 Internal audit

General

Internal audits of the EMS shall be conducted at planned internals to determine and provide information on whether the system conforms planned arrangements and has been properly implemented and maintained.

Internal audit program

An internal audit program shall be established to ensure the planning of internal audits and to identify the audits needed to achieve the audit program objectives. The frequency of internal audits shall be based on the nature of our operations in terms of our environmental aspects and potential environmental impacts, risks and opportunities, the results of previous internal and external audits and other relevant factors.

Outsourced processes shall also be considered in the planning of the audit program. The internal audit program shall cover all locations and functions, system elements and the full scope of the EMS, ensuring they are audited to a defined frequency.

Internal audits shall be planned and conducted by an objective, impartial and competent auditor.

Internal audits shall be formally recorded as documented information with the report confirming compliance or used to correct or prevent specific nonconformities.

Applicable procedures **MSP15 Audits**

13 Management Review

General Management Review

Fortis shall conduct a review of its EMS to evaluate the systems continuing suitability, adequacy, effectiveness and alignment with the strategic direction of Fortis. Its review shall cover the environmental aspects of the activities, products and services that are within the scope of the EMS.

Monthly management meetings can be used as a supplementary review of aspects of the EMS, in addition to a

full management review annually.

Management Review Inputs

The management review shall cover;

the status of actions from previous management reviews,
changes in external or internal issues, needs and expectations of interested parties and workers, compliance obligations and legal requirements, and risks and opportunities,
extent to which environmental objectives are achieved,
environmental performance, monitoring and measurement results, including nonconformity (including investigation) and corrective action, audit results, interested parties' and workers' communications (including complaints), compliance obligations fulfilment, opportunities for improvement and adequacy of resources.

Management Review Outputs

The intended outputs of the Management Review shall include conclusions regarding the EMS, and any consequential opportunities for improvement, EMS changes, actions and resource needs, opportunities to integrate EMS with other business processes and any implications for Fortis strategic direction.

Applicable procedures **MSP16 Management Review**

14 Improvement

General Improvement

Fortis shall determine and select opportunities for improvements and implement any necessary actions to meet the requirements and maintain the effectiveness of our EMS. Opportunities for improvement shall be identified from monitoring, measurement, analysis and evaluation of environmental performance and fulfilment of compliance obligations, audits of our EMS and the management review, feedback from interested parties, industry advancements and research. Implementation shall include improvements to meet current requirements as well as addressing future needs and expectations; correcting, preventing or reducing undesired effects; and continually improving the performance and effectiveness of the EMS, and is managed through methods for change.

Nonconformity and corrective action
Fortis shall establish, implement and maintain a systematic approach for the identification, taking actions to mitigate any adverse impacts (including control, corrections, consequential), formal reporting, investigation and causal analysis to determine and manage nonconformities.

Nonconformity is the non-fulfilment of a requirement which can be stated in relation to our QMS or in terms of quality performance. Internal audits and site inspections are one way of periodically identifying nonconformities. Nonconformities shall be investigated to determine the cause in order for corrective actions to be focused on the appropriate part of the QMS, risk and relevant risk assessments shall be reviewed to ensure current and adequate. Plans for addressing nonconformities shall consider actions to resolve the problem, changes to correct the situation and restore normal operations, and actions to eliminate the causes and prevent the nonconformity from recurring or occurring elsewhere. The timing shall be appropriate to the nature and magnitude of the nonconformity and the quality impact. Where actions result in changes to the QMS the process is managed through methods for change including related documented information and competence shall be updated as applicable and changes communicated to those involved. Actions taken to address nonconformities will be reviewed and effectiveness evaluated. Documented information will be retained and communicated, as appropriate (to workers and interested parties), as evidence of incidents and nonconformity nature, actions,

consequences and effectiveness of implemented actions.

Where a potential problem is identified but no actual nonconformity exists the process described above can be used to prevent a nonconformity from occurring.

Applicable procedures	**MSP17**	**Nonconformity and Corrective Action**
	MSP11	**Feedback and Complaints**

15 Continual improvement

Fortis shall continually improve the suitability, adequacy and effectiveness of Quality Management System. Continual improvement is integral to enhancing quality performance and is accomplished by providing an environment and promoting a culture for encouraging all employees to contribute and implement ideas for improvement, by the achievement of quality objectives and enhanced quality performance, and the communication of these results and successes to interested parties (including workers).

Opportunities for improvement shall be identified by the continual analysis and evaluation of our quality performance and the results and outputs of our QMS processes. The Management Review process shall ensure direct involvement by the Directors in the evaluation and identification of needs and opportunities for continual improvement.

Data gathered during the ongoing program of monitoring of the QMS and following investigations into nonconformity shall be reviewed, analysed and can provide significant opportunities for improvement.

When continual improvement opportunities are identified they shall be evaluated to determine what actions shall be taken. These actions are to be planned and changes to the QMS implemented in a controlled manner, with the maintenance and retention of documented information as evidence of continual improvement, evidenced results and effectiveness evaluated.

Applicable procedures **MSP18 Continual Improvement**

APPENDIX 1 - Environmental Management System Procedure referred to in this manual

Procedure Ref.	Title
MSP01	Context of the Organisation
MSP02	Interested Parties, Needs and Expectations
MSP03	Leadership and Commitment
MSP04	Organisation and Responsibilities
MSP05	Risk and Opportunity
MSP05.1	Compliance Obligations
MSP05.2	Environmental Aspects & Impacts
MSP05.3	Quality Plans
MSP06	Planning
MSP6.1	Change Assessment
MSP06.2	Risk Assessment
MSP06.3	COSHH Assessment
MSP06.4	Safe Systems of Work
MSP06.5	Occupational Health
MSP07	Resources
MSP07.1	Management of Contractors and External Providers
MSP08	Laboratory Testing Sampling Procedure
MSP09	Competence
MSP09.1	Competence – Site Training Matrix
MSP09.2	Competence – Additional Training
MSP10	Communication
MSP10.1	Site Induction
MSP10.2	Site Safety Meetings
MSP10.3	Site Safety Representatives
MSP10.4	Toolbox Talks, Safety Alerts, Reminders and Briefings
MSP10.5	Site Safety Notice Boards
MSP11	Feedback & Complaints
MSP11.1	IBAA Sales
MSP11.2	Invoicing
MSP12	Documented Information
MSP12.1	Documented Information – Records
MSP13.1	Emergency Preparedness – Site Emergency Plans
MSP13.2	Public Relations - Following A Major Incident
MSP14	Monitoring, Measurement, Analysis and Evaluation
MSP14.1	Control of Monitoring and Measurement Devices
MSP14.2	Evaluation of Compliance
MSP15	Site Audits
MSP15.1	Site Systematic Inspection Schedule
MSP15.2	Directors Safety Visit
MSP16	Management Review
MSP16.1	Management Objectives
MSP17	Nonconformity and Corrective Action
MSP17.1	Injury and Incident Reporting
MSP17.2	Injury and Incident Investigation
MSP17.3	Near Miss Reporting
MSP18	Continual Improvement
MSP19	In House Water Content Testing Procedure
MSP20	Metals Recovery Testing Procedure
MSP21	Product Nonconformity, Corrective and Preventative Actions
MSP 23	*IBA Sieving Procedure*
Site P's	Operational Controls