



## Recycling and recovery UK

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### Management Systems

#### Introduction

SUEZ Recycling and Recovery UK Ltd (SUEZ) operates using a management control system to ensure that infrastructure and services are:

- of a consistently high quality;
- effectively mitigates environmental impact;
- minimises health and safety risks.

The Integrated Management System (IMS) combines quality, environment and health and safety into a single consolidated system. The IMS provides a tried and tested framework for managing all areas of the company's operations to a uniform standard of compliance. The IMS is accredited to ISO 14001:2015 for environmental management (a copy of the ISO 14001:2015 certificate is attached as Appendix 1).

The implementation of an accredited integrated Environmental Management System (EMS) throughout the organisation has increased the understanding of the impacts of our activities on the environment, the measures needed to control such impacts and allowed these to be incorporated into everyday practices and into every contract.

Our Chief Executive Officer, John Scanlon is responsible for the overall management of SUEZ and for setting policy, to ensure that SUEZ complies fully with its legal duties in respect of the environment, health, safety and welfare of its employees and those who may be affected by SUEZ activities. For the purposes of OHSAS 18001, ISO 14001 and ISO 9001 management systems operating within SUEZ, the CEO holds the position of Management Appointee and Management System Representative, delegating these responsibilities to appropriate personnel where relevant.

The contents of the IMS constitute Company Policy formulated in response to statutory provisions, enforceable in both Criminal and Civil Law. All employees of SUEZ are required to comply with all applicable stipulations.

A copy of SUEZ's Integrated Policy Statement that underpins the IMS is attached at Appendix 2.

#### Scope of the Integrated Management System

The IMS is a single complementary system, rather than three separate systems and is used to manage performance and to ensure quality, environmental and health and safety compliance. It is applied to all areas of the company's operation. This integration ensures consistency of approach to establish working procedures that consider aspects of environmental and health and safety compliance, whilst delivering a high quality of service every time.

The IMS provides a framework for setting and reviewing performance targets and stimulates change to continually improve in each area of performance (e.g. improve quality of service, reduce health and safety incidents, minimise environmental and sustainability risks).

This integrated approach encourages SUEZ to consider environmental and safety data alongside its operational decision making, bringing sustainability issues to the heart of the project.

The IMS streamlines working practice, as many of the objectives and methods used to implement each of the management schemes overlap. For example, quality management systems are used in ensuring continued compliance with health and safety and environmental regulations and in ensuring that activities are carried out in a safe manner.

The scope of SUEZ's integrated management system covers, but is not limited to:

'The collection, transport, sorting, separation, treatment and disposal of household, municipal, commercial and industrial waste (including hazardous and difficult waste), waste transfer stations, materials recycling facilities, security shredding facilities, composting plants and household waste recycling facilities.'

The scope also includes certification for:

'The design and development of waste management facilities'

The IMS has been developed to ensure that it is appropriate to:

- the nature and scale of SUEZ's activities, products and services;
- the occupational health, safety and environmental risks and impacts of SUEZ's operations; and
- the purpose of SUEZ.

It includes a commitment to comply with legal and other requirements relating to its health and safety risk and environmental impacts, with the aim to prevent injury, ill health and pollution.

## Structure of SUEZ Integrated Management System

The IMS is structured and communicated in five defined tiers:

	TIER	
Integrated Policy statement	1	<b>SUEZ Integrated IMS</b>
IMS Policy Manual	2	
IMS Procedures Manual	3	
Divisional and site-specific operational procedures	4	
Records	5	
<b>1</b>	SUEZ's Management Committee defines the Integrated Policy Statement	
<b>2</b>	The Policy Manual introduces the IMS and details its scope and content	
<b>3</b>	Documents procedures relating to all company activities e.g. training, awareness and competence, complaints, purchasing and verification of products and services and control of records.	
<b>4</b>	These relate to specific divisions and site-specific operations within the company	
<b>5</b>	Each procedure identifies how actions must be recorded to demonstrate conformity and effective operation. For example, manual employee induction requires a manual induction record sheet to be completed. This becomes part of the information that can be used for reporting purposes and in auditing the system.	

The IMS framework is:

- Documented, implemented and maintained;
- Communicated to all employees working for or on behalf of SUEZ and is made available to the public and other interested parties; and
- Reviewed periodically for continuing suitability and relevance.

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In line with our corporate Integrated Policy Statement (Appendix 2), SUEZ is committed to mitigating the impact of our operations on the environment by:

- ensuring all facilities are managed in such a way as to prevent and minimise pollution;
- seeking to minimise the environmental impact of transport use;
- seeking to reduce the amount of energy obtained through non-renewable resources, use energy efficiently and reduce greenhouse gas emissions;
- using suppliers or contractors that have environmental standards compatible with our own; and
- continually reassess in light of changing technology, legislation, the precautionary principle, business requirements and best practice.

At a facility level, in addition to the IMS, the Facility will be operated in accordance with its Environmental Permit, Management Plans, Operating Techniques and other associated management documents. These documents ensure that the facilities are operated in compliance with the relevant regulatory controls, and that control measures are regularly reviewed and improved where possible. These operational procedures will include but will not be limited to:

- staff competence
- site infrastructure
- waste acceptance
- waste storage and handling
- waste processing
- method statements for operation of the facilities
- environmental monitoring
- auditing
- reporting

The IMS provides a framework to control releases to water, air and land, and ensure nuisance issues (e.g. odour, dust and vermin) are appropriately managed and confined to the site. The contents of the IMS is included as Appendix 3.

## **Auditing**

Key to SUEZ's success in implementing and maintaining an effective IMS has been a comprehensive internal audit programme aimed at ensuring our policies and procedures are complied with throughout the organisation. The policy of continual improvement of the IMS system is also fostered through the use of the objectives and targets, analysis of data, corrective and preventive actions and management review.

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## Internal audits

Internal audits of the IMS will be conducted at planned intervals (at a frequency not greater than six months) to determine whether or not the IMS:

- Conforms to the planned arrangements for health and safety, environmental and quality management;
- Has been properly/effectively implemented and maintained;
- Is effective in meeting SUEZ's policies and objectives;
- Review the results of previous audits; and
- Provide information on audit results to management.

SUEZ's Business Control function are responsible for producing and managing the audit programme.

Our Business Control function ensures that audits are conducted in an objective and impartial manner, with the audit function separate from operations.

SUEZ's auditing and compliance database COMPAS is used to record audit results. Where non-conformance/non-compliance with the requirements of the IMS or relevant legislation or a deficiency in the IMS is identified a CAR (Corrective Action Request) is raised in COMPAS. The CAR details the actions required, persons responsible, and gives appropriate deadlines for rectification of the non-conformance. Should the timescales be exceeded, notifications are sent to escalating levels of management, eventually reaching the Chief Operating Officer.

## External Audits

External audits of SUEZ's IMS activities will be conducted every twelve months by an external certifying body accredited by the National Accreditation Council. The external audits will include ISO 14001:2015 as well as ISO 9001:2015 and OHSAS 18001:2007.

As detailed above, where any non-compliances are identified, SUEZ will use COMPAS to generate a CAR and to monitor corrective actions.

Management teams will use reports from COMPAS to track progress of issues and to demonstrate how improvements have been made in addressing any problem. SUEZ will audit any sub-contractors that do not have their management systems in place. The sub-contractors will be asked to comply with the relevant procedures of SUEZ's IMS and will subsequently be included in the programme of audits carried out by SUEZ's audit team.