

Plastica Ltd

Operational Planning and Control (ISO 14001:2015, Clause 8.1, ISO 45001:2018, Clause 8.1.1, 8.1.2 and 8.1.3)

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1.0 Introduction

Operational control is established by the use of documented procedures, the implementation of which should aid the avoidance of situations where our Policies, Objectives and Targets are compromised. Procedures will pertain to identified significant environmental aspects and to addressing hazards identified through the process identified in HS&E 38 Actions to Address Risks and Opportunities. These shall be communicated to our Suppliers, Customers and Contractors where this is appropriate to the business. Plastica Ltd considers the 'product life cycle' in its planning phase.

2.0 Recording

The recorded assessment should be an effective statement of hazards and risks, which then leads management to take the relevant action to reduce the risk. The Risk Assessment Methodology used by Plastica Ltd for assessing Environmental Risks is described in this document.

It should be noted however, that in the case of the environment, the main risks are associated, whether direct or indirect, with the control of:

- Emissions to air;
- Releases to water;
- Waste management;
- Contamination of land;
- Noise, odour, dust, vibration and visual impact;
- Use of raw materials and natural resources:
- Other local environmental and community issues;
- General discharges and potential contamination.

In addition to an environmental risk, any of these may also be a cause of injury or health problems. OH&S risks may result from our activities and the following are considered:

- Use of flammable liquids, solvents, paints and glues, including their containers;
- Equipment hazards (rotating machinery, belt drives, etc.)
- Vehicle movement:
- High pressure systems;
- Corrosive liquid containment;
- Chemical hazards;
- Biological hazards.

3.0 Contents

- 1. Address all relevant hazards and risks.
- 2. Consider what normally happens in the workplace.
- 3. Consider who or what might be affected.
- 4. Take into account existing precautionary measures.
- 5. Show what control measures are to be put in place to ensure a safe system of work.

4.0 Format

Identify the environmental aspects and determine those which have or could have a significant impact on the environment. This procedure also describes the responsibilities and actions required for the maintenance of the Environmental Aspect and Significant Impacts Register.

5.0 Evaluating Significant Aspects

The methodology described below assesses the significance of each environmental aspect on the register by scoring the aspect against three criteria:

<u>Likelihood of Occurrence</u>: is evaluated by the use of historical knowledge and consideration of existing systems and procedures.

<u>Likelihood of Detection</u>: considers the methods which we use to deter occurrence. Ongoing monitoring would attract a lower score than that for reliance upon random inspection.

<u>Severity of Consequence</u>: not only considers scientific evidence but makes allowance for Public and Customer attitudes and views of regulators, effect on Company image etc.

6.0 Risk Assessment and Risk Control

Table 1 – Likelihood of Occurrence

FREQUENCY OF OCCURRENCE	RANK	CONTROL OF PROCESS	WEIGHTING FACTOR
Daily – approximate	10	Relies on unsupervised control	10
Weekly – approximate	8	Relies on close Supervision OR Manual Controls	8
Monthly – approximate	6	Relies on close Supervision AND Manual Control	6
Quarterly– approximate	4	Relies on Supervision to start automatic plant or result of an accident only.	4
Annually (or less) – approximate	2	Fully automatic plant or caused by vandalism.	2

Table 2 – Likelihood of Detection

CRITERIA	WEIGHTING FACTOR
Certain: Continuous supervision and high visibility / alarms on machines.	0
Very High: Frequent monitoring and high visibility	2
High: Frequent monitoring, poorly visible or hidden release	4
Moderate: Occasional monitoring, poorly visible	6
Low: Occasional monitoring, invisible	8
Very Low: Not monitored, slow release, invisible e.g. leak from pipes/drains.	10

Table 3 – Severity of Consequence

CONDITION	WEIGHTING FACTOR
Insignificant	0
Minor addition to historical pollution or global emissions or low risk of minor injury	2
Short term adverse effect. Moderate risk of minor injury or short term health risk.	4
Medium term effect; Proposed Legal Requirement; Impact on Company image. Risk of more severe injury, or health implications.	6
Long term adverse effect; Significant addition to global emissions; Impending Legal Requirements; Irritating to Public / Local Residents. Risk	
of serious injuries or long term health effects.	8
Toxic Release; New Legal Requirements within One Year; Highly visible to Public / Local Residents; Major Impact on Company though image (e.g. National Press Coverage / Loss of Business)	
Major incident; multiple serious injuries or deaths, permanent health effects on victims.	10

<u>Table 4 – Significant Ratings</u>

By adding the scores from table 1, 2 and 3 together you get an overall score assessing significant impacts are rated as follows:

SCORE	PRIORITY
25 – 30	1
16 – 24	2
< 15	3

The scores are noted on the Aspects Register and prioritised as 1, 2 and 3 with 1 being the highest priority. Those aspects with scores of 1 or 2 are deemed as significant impacts.

All aspects with scores of 3 are reviewed for subjectivity by the Managing Director and are generally based on judgement of local knowledge, experience and opinion rather than external facts, during assessment scoring and amended if necessary – this may, as required, involved discussion and liaison with external parties. Assessment of significant impacts may lead to their inclusion in the Objectives and Targets Register.

7.0 Objectives and Targets

Objectives and targets play a key role in the management of improvements in environmental performance or OH&S performance.

An **Objective** is a goal to be achieved in a particular area and is consistent with our Policy, e.g. to reduce the consumption of non-renewable energy or incidence of minor injuries.

A **Target** quantifies an objective by setting it in specific numerical terms, e.g. energy consumption will be reduced by 20% over 5 years, or minor injuries reduced by 30%.

8.0 Management Programme

Once aspects have been identified, assessed and prioritised they are recorded in the Significant Impact Register, as detailed above. The Management Review Meeting will discuss and agree which aspects are to be targeted and their order of priority.

From this review meeting, the agreed objectives and targets will be formally recorded on an Objectives and Targets Register and where necessary, an Environmental Management Programme report generated. This report will include a description of and define responsibilities for objects and targets and the timeframe within which the target will be achieved.

Control is achieved through ensuring that documented procedures and instructions address all significant aspects. These are monitored by regular inspections, measurements and audits. The procedures ensure controls are in place for:

- Noise and visual impact;
- Emissions to air;
- Emissions to water:
- Avoiding land contamination;
- Printing operations;
- Storage, packaging and delivery;
- Vehicle control and maintenance;
- Waste controls (including The Waste Electrical and Electronic Equipment directive (WEEE) or equivalent national legislation;
- Ink, chemicals, solvents and substrates;
- Plant maintenance, including machine guarding and other safety requirements.

The Senior Management is responsible for reviewing resources within the Company ensuring that they are sufficient to meet business requirements. Details are recorded as part of the Management Review Meetings.

When there is any significant change, as determined by the Senior Management, the relevant assessments will be reviewed to decide if any further actions are necessary.

9.0 Related Documentation

PD 001 – Plastica Document Register

HSEF 115 – Environmental and H&S Objectives

HS&E 47 – Legal and Compliance Register

HS&E 48 – Environmental Assessment and Impact Register

HSEF 20 – Accident Report – Damage to Property Only

HSEF 21 – Accident Report – Injury to Person and Damage to Property

HSEF 22 – Accident Report – Injury to Person Only

HS&E 15 – Fire Evacuation Procedure