

Panelwall Pty Ltd

Environmental Management System

ISO 14001:2004



green building council australia
MEMBER

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1.0 Company Overview

Panelwall is committed to providing environmentally sustainable solutions for the corporate office and retail environments.

All of our products are developed with a holistic approach to ensure that our systems have a minimal impact on the environment at the time of Panelwall's installation. After Panelwall's practical lifecycle, all of the systems components can either be reused, remanufactured or recycled into other viable construction materials.

Panelwall's commitment to the environment and its clients transcends far beyond the initial installation of its products but continues well past the usable life of any one of Panelwall's components.

1.1 Aim

Panelwall's Environmental Management System aims is to ensure that the Company fulfils the Environmental Management System requirements with the Company's capability to provide quality demountable office partitions in an environmentally friendly working environment.

1.2 Scope

The scope of Panelwall's Environmental Management System includes the provision of designing, manufacturing and construction of demountable office partitions using approved subcontractors. Panelwall's Environmental Management System ensures the identification, assessment and control of environmental risks at the Company's office and through supplier assessment for subcontractor management.

2.0 Amendment Table

PAGE	ISSUE	DATE	DETAILS
Entire Manual	1	20/1/11	Implementation of the Environmental Management System Manual
Entire Manual	2	21/3/11	Amend references to PW-F-13 from "Subcontractor Audit Checklist" to "Subcontractor Self Evaluation Audit Checklist"
Section 7.1	3	09/04/11	Amend 7.1 NSW Legislation & Regulations, add, modify and delete Legislation references to reflect current Legislation and include links to the above mentioned Legislation
Section 5.2	4	09/05/12	Remove Ex - Director Leigh Bricknell from Roles and Responsibilities.
Section 7.1	5	28/05/12	Changed to include PW-F-01 and register PW-R-04
Section 8.3	5	28/05/12	Changes to supplier assessment criteria and listing on PW-R-02
Section 8.3	6	11/6/13	Added information on how old supplier information is to be stored.

Distribution

The Environmental Management System's manual and associated documentation are held electronically; no controlled printed copies are maintained. Printed copies, which are used in some cases for reference purposes at Project sites, are to be considered "uncontrolled".

3.0 Environmental Management System Overview

Panelwall Pty Ltd Environmental Management System (EMS) outlined in this manual is designed to satisfy company business needs and the requirements of ISO 14001.

Panelwall's Environmental Management System comprises of the following elements:

- EMS Manual
This Manual outlines the structure and principles of operation of the Environmental Management System including procedures, each of which aligns with major elements of the environmental system standards.
- EMS Forms, Procedures and Registers. This electronic folder contains all of the documentation required for the EMS.
- EMS Action System
This is a system to rectify records as well as improve and prevent all issues raised within the EMS. Records of all EMS actions resulting from non-conformances, corrective and preventive actions and customer feedback are maintained and reviewed by management. These are recorded within the EMS action register.
- EMS Legislation
Details all current legislation current and applicable to Panelwall.
- EMS Records
Contained with the record master.

The networking of the various processes contained in this section are designed to better understand, meet and exceed customer requirements while continuously monitoring and improving all processes necessary to achieve our environmental objectives.

Many of the critical, implemented processes described in the following paragraphs have been documented as specific procedures to ensure they are monitored and controlled while other less critical processes are covered within the procedures documented.

Environmental Management System interrelated processes

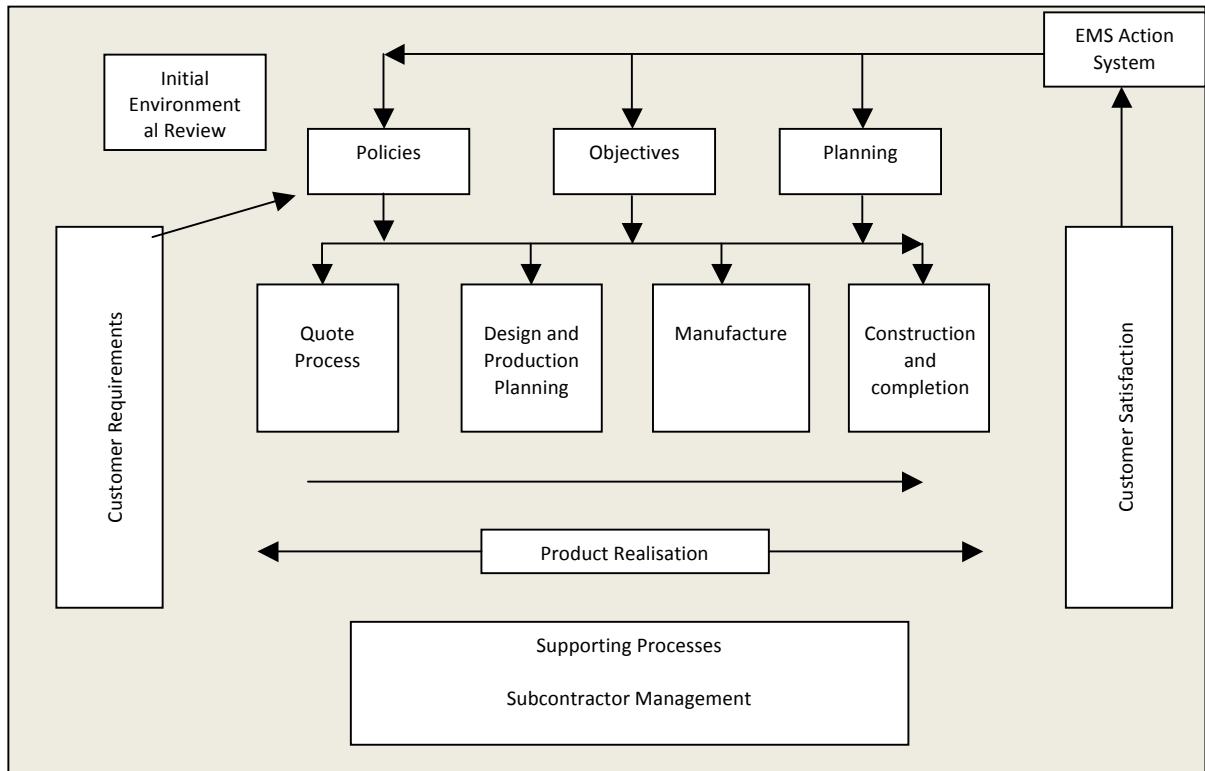


Figure 1 - Environmental Management System interrelated processes

4.0 Terms and Abbreviations

The terms and definitions used in this manual are generally in accordance with those used in the standard ISO 14001:2004

EMS	Environmental Management System
EMS Action Form	Electronically held and printed copy of form for reporting project issues and suggestions to be entered into and acted upon within the EMS
EMS Action System	System for reporting and dealing with non-conformances, corrective and preventive actions, issues and suggestions etc
Company	Panelwall
Client	Prospective customer
Documents	All instructions and communications – both hard copy & electronic format
Internal audit	Auditing of the EMS conducted by Panelwall staff
ISO	International Standards Organisation
Non-conforming	Refers to product or service that does not comply with environmental or product requirements either specified by customer or applicable standards
Procedure	Documented instruction containing methods & guidelines for performing EMS processes
Process	Method or course of action for completing tasks
Product	All fabrications produced by Panelwall that are delivered to clients
External audit	Periodic examination and assessment of the EMS by an independent authority
Records	Recorded evidence of compliance with the EMS
EMS Improvement Plan	A register of major and significant Quality, and Environmental company targets and objectives.
Emergency preparedness plans	Procedures describing the company's emergency preparedness.

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Initial Environmental Review	An initial audit at the company's offices and workshop facilities which identifies the environmental aspects and impacts.
Environment	<p>Includes –</p> <ul style="list-style-type: none"> a) ecosystems and their constituent parts, including people and communities; and b) all natural and physical resources; and c) the qualities and characteristics of locations, places and areas, however large or small, that contribute to their biological diversity and integrity, intrinsic or attributed scientific value or interest, amenity, harmony and sense of community; and <p>The social, economic, aesthetic and cultural conditions that affect, or are affected by, things mentioned in paragraphs (a) to (c).</p>
Environmental harm	<p>Is any adverse effect, or potential adverse effect (whether temporary or permanent and of whatever magnitude, duration or frequency) on an environmental value, and includes environmental nuisance.</p> <p>May be caused by an activity –</p> <ul style="list-style-type: none"> a) whether the harm is a direct or indirect result of the activity; or b) Whether the harm results from the activity alone or from the combined effects of the activity and other activities or factors.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.
Environmental nuisance	<p>Is unreasonable interference or likely interference with an environmental value caused by -</p> <ul style="list-style-type: none"> a) noise, dust, odor, light; or b) an unhealthy, offensive or unsightly condition because of contamination; or <p>Another way prescribed by legislation.</p>

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<p>Environmental value</p>	<p>Is a quality or physical characteristic of the environment that is conducive to ecological health or public amenity or safety; or</p> <p>Another quality of the environment identified and declared to be an environmental value under an environmental protection policy or regulation.</p>
<p>Serious environmental harm</p>	<p>Is environmental harm (other than environmental nuisance –</p> <ul style="list-style-type: none"> a) that causes actual or potential harm to environmental values that is irreversible, of a high impact or widespread; or b) that causes actual or potential harm to environmental values of an area of high conservation value or special significance; or c) that causes actual or potential loss or damage to property of an amount of, or amounts totaling, more than the threshold amount; or d) that results in costs of more than the threshold amount being incurred in taking appropriate action to – e) prevent or minimise the harm; and f) Rehabilitate or restore the environment to its condition before the harm.
<p>Waste</p>	<p>Includes anything that is –</p> <ul style="list-style-type: none"> a) left over, or an unwanted by-product, from an industrial, commercial, domestic or other activity; or b) Surplus to the industrial, commercial, domestic or other activity generating the waste.

5.0 Management Commitment

5.1 Environmental Policy Statement

The Environmental Policy is a Company statement, which will change as business goals are redefined. The Environmental Management Systems Representative is responsible for ensuring that staff have access and understand the Environmental Policy and system documentation as they join the company.

The Environmental Policy is made available for public viewing though Panelwall website.

The Environmental Policy will be reviewed at the management review meeting.

Environmental Policy Statement

Panelwall Pty Ltd is committed to environmental sustainability. We strive to balance our economic and operational requirements with our social responsibilities to minimise impact on the environment and surrounding community. Continual improvement in environmental performance is a key element of our commitment to social responsibility and sustainability.

To assist us in achieving our environmental objectives we will undertake the following:

- Promote a culture of innovation and participation engaging our employees and subcontractors to contribute to improving the organisations environmental performance;
- Promote the efficient use of energy, reduction of waste and recycling of materials in all of our organisation activities;
- Encourage ethical environmental practice and behavior including respect for cultural and community values;
- Maintain formal environmental management systems which conform to recognised standards including ISO 14001;
- Comply with environmental laws applicable to our project and meet or exceed all relevant statutory obligations and codes of practice to which we subscribe;
- Assess project environmental risks and implement appropriate risk management programs to continually improve performance across our project;
- Report regularly on our environmental performance and take remedial action where performance does not meet expectation;
- Communicate this policy to all our organisations personnel, contractors and client through induction, education and training to promote environmental responsibility and obligations;
- Influence our suppliers and contractors to act consistently with our approach towards responsible environmental practices; and
- Periodically review this policy and the environmental management system to ensure both remain relevant to our project.
- This policy will provide the framework for setting environmental objectives and targets within the Organisation.
- All employees and subcontractors are to be made aware of this policy and are required to actively work towards achieving its objectives in their specific area of responsibility.

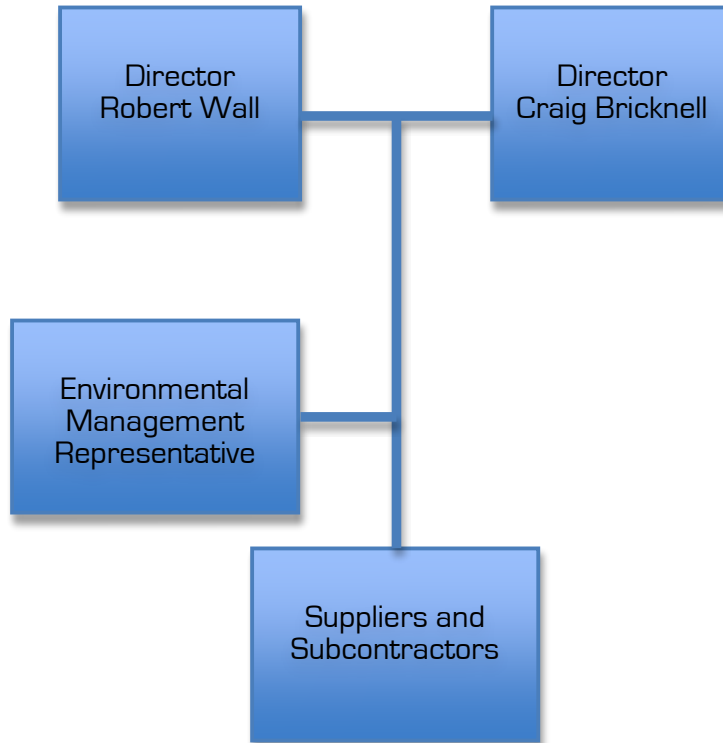
Director: C. Bricknell

Date: 09/05/2012

Director: R.Wall

Date: 09/05/2012

5.2 Resources, Roles, Responsibility and Authority



It is the responsibility of all Panelwall personnel to participate in and contribute to the EMS. This may be accomplished by identifying any areas where the quality of our products, the environmental impact of our operation or the well being of our staff may be improved.

Identified issues are to be reported directly to the EMS Representative, using the EMS Issue and Action form.

Authority for the implementation and maintenance of the EMS is restricted to the following Staff:

Managing Directors

The Managing Directors have the overall responsibility to ensure that the EMS is developed in accordance with the requirements stated within the Environmental Policy Statement and has the authority to direct all staff on matters consistent with performing their duties in accordance with the EMS requirements.

Environmental Management System Representative

The Environmental Management System Representative has the authority to represent Panelwall on all matters pertinent to the EMS as established by contract

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requirements, regulatory requirements, company Environmental policy and procedures.

The Environmental Representative has the authority and the primary responsibility to structure, implement and maintain the EMS to ensure compliance with the requirements of the Environmental Management System standard ISO 14001:2004 and all applicable legislation.

Specifically, the Environmental Representative has the authority in the areas of:

- Verifying that the EMS is implemented and maintained;
- Monitoring the EMS to determine where improvements are needed and recommending the necessary corrective action.

The Environmental Representative maintains an independent position, free of cost and other work restraints in carrying out these tasks.

The Environmental Representative is authorised to appoint internal auditors at appropriate times to conduct the internal audits.

Other staff employed by Panelwall have position descriptions, which contain EMS roles and responsibilities.

5.3 Competence, Training and Awareness

Aim

- (a) To establish, monitor & maintain a system for identifying the training needs of personnel working on behalf of PanelWall and to ensure that the identified training is undertaken as per the training matrix and reviewed on an annual basis.

Procedure

Panelwall subcontracts all operations of the Companies business and has no paid employees. An environmental subcontractor induction will be completed by all subcontractors relating to the following business processes:

- Raw Materials
- Manufacturing
- Delivery and freight
- Construction

The environmental induction process shall introduce the:

1. Environmental Management Policy;
2. Reasons for the Policy – environmental duty of care or obligations;
3. Requirement to develop an environmental awareness.
4. Review in detail those elements that directly relate to their work to be carried and their environmental responsibilities under the EMS and the potential consequences of departure from specified procedures.
5. Review procedures to be followed in the event of an emergency and report any incidents or accidents.

On completion of the induction the subcontractor is required to sign and return the completed induction form.

Site Construction subcontractors

All new contractors to Panelwall are required to complete any specific site inductions and meet with Site staff (in accordance with the normal induction process prior to commencement of any work). Contractors are required to sign and document their agreement to work at all times within the requirements of the site.

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Any Contractors who fail to comply with these conditions are to be appropriately counseled and, if necessary, removed from the Site. Employee work requirements are to apply equally to contractors, including the use of protective clothing, the use of work permits and all other requirements related to the systems operating within the Site.

Reference

PW-F-07 Subcontractor Environmental Induction

PW-R-03 Subcontractor Induction and audit Matrix

6.0 Continual Improvement

6.1 Nonconformance, Corrective and Preventative Action

Aim

This procedure includes investigation of corrective action including:

- The determination of the root cause
- The planning of the action to be taken
- The carrying out of actions proportional to the severity of the problem
- The applying of controls to ensure that any action taken is effective in preventing recurrence of the noncompliance
- The recording of any changes to procedures resulting from the corrective action

Objectives and targets are established as a result of a significant nonconformance or potential nonconformance to monitor the effectiveness of solutions.

Procedure

A Nonconformance is any problems that are found, or variations to the intended process. Environmental nonconformances are typically circumstances where the intent of the EMS is not complied.

Corrective action is that action taken to ensure the root cause of a nonconformance (or a number of nonconformances) is acted upon to prevent a recurrence.

Preventive action is that action taken which will prevent a nonconformance occurring in the first place.

The EMS Management Representative is to implement action to identify and segregate nonconformances or is to delegate this to another suitably qualified employee.

Reporting Environmental Issues

All significant environmental issues, problems and incidents are to be reported to the EMS Management Representative, who is to immediately inform the Directors of Panelwall.

The Environmental Management Representative is responsible for investigating and recommending corrective or preventive actions.

Corrective Action

All corrective actions restore compliance of the non-conforming element and addresses issues. These include less than satisfactory environmental audits, improvements to the EMS, investigations on an environmental impact and adverse customer feedback will be taken using the EMS Action System.

Any issue identified as requiring corrective action will be recorded on an EMS Action Form that will be acted upon as described in the previous section.

An Environmental Improvement System register will be maintained at Head Office for EMS issues raised that are office and subcontractor related.

References:

PW-F-02 EMS Issue Action Form
PW-R-01 EMS Action Register
PW-P-02 Corrective and Preventive Action procedure

Preventive Action

All staff and subcontractors are encouraged to make suggestions and report any ideas or issues that could improve the EMS system or to avoid the occurrence of any potential problems in the manufacturing of products, environmental impacts or the health and wellbeing of staff.

All such issues will be reported using the EMS Action Form which will be acted upon as described in the Nonconformance section 6.1.

References:

PW-F-02 EMS Action Form
PW-R-01 EMS Action Register

6.2 EMS Management Review

Aim

To periodically review the suitability and effectiveness of the EMS.

Procedure

Management Review Meeting

Management Review Meetings are held annually unless otherwise stated in the minutes of previous meetings.

Personnel attending management review meetings include the Business Directors, EMS Representative and other personnel as required.

Minutes of the meetings are recorded and maintained by the EMS Representative. Minutes include notes of the discussions/review activities, including references to documents, which are tabled for review purposes, action officers and proposed action completion dates.

Where required, items to be discussed/ reviewed are specified in an agenda circulated to prospective attendees prior to the meeting.

The management review agenda includes review of the following (as applicable)

- (a) Minutes of last meeting and business arising from last meeting, including any follow up action.
- (b) Results of evaluations of compliance with legislation, regulations and any codes.
- (c) Review of internal and external audit results including any recommendations made.
- (d) Assessment of environmental aspects and impacts.
- (e) Evaluation of environmental performance, objectives and targets through the Environmental Improvement Plan.
- (f) Review of any outstanding environmental issues and communication from interested parties, including complaints.
- (g) Continuing suitability of the Environmental Policy.
- (h) Review of the suitability, effectiveness and adequacy of the EMS.
- (i) Review of corrective and preventive action – continual improvement.
- (j) Changing circumstances, including developments in legal and other documents.

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- (k) Review of training needs and the effectiveness of training received.
- (l) Issue of corrective action or additions to the Environmental Improvement Plan emanating from the above.
- (m) Other Business.
- (n) Date of next Meeting.

Where applicable, this includes review of data, which indicates a trend. Typically, this may include summaries of non-conformance reports that would indicate improvement or deterioration of the system.

The Directors approve the minutes.

The Representative maintains a file of the minutes within a management review-meeting file.

Minutes of meetings are circulated to attendees and other employees as necessary.

Follow up

The EMS Representative follows up of all actions and action their completion dates. Details of these are included on the EMS Representatives copy of the minutes.

Where proposed actions are either inadequately implemented or failed to provide the expected results, the Environmental Management Representative raises corrective action requests.

References

PW-F-02	EMS Issue and Action Form
PW-F-06	Management Review Meeting Minutes
PW-P-01	EMS Management Review Meeting

6.3 Internal Auditing

Aim

Panelwall has established documented procedures for auditing to ensure that:

- Environmental activities conform to the requirements of the EMS in place in terms of adherence.
- The EMS is effective in fulfilling the requirements of the Environmental Policy.

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- Subcontractors are annually audited to ensure that they are fulfilling Panelwall's EMS requirements.

An audit schedule has been provided to:

- Schedule planned audit activities (the frequency of auditing for any particular area or activity is to be independent on its importance and impact on environmental matters and the result of previous audits).

Procedure

The EMS and subcontractors are audited annually to ensure that the EMS is used and continues to be applied in accordance with the EMS Management System. The frequency of audits of particular activities is dependent on the potential likelihood of a significant environmental effect/impact.

It is the EMS representative's responsibility to ensure that these audits are conducted as planned.

The EMS representative will delegate persons to perform the audits upon their knowledge of the element, audit skills and position within the organisation. No person may audit his or her own work.

The auditor conducts the audit using the Internal Audit Notes and Audit Form. The auditor will examine objective evidence and ascertain whether the system element is operating in accordance with the EMS documented procedures and processes and the organisation's requirements.

Audit results are to be recorded on the Internal Audit Report Form and returned on completion to the EMS Representative.

Elements not meeting the organisation's requirements are to be recorded in detail on the EMS Action Form.

The EMS representative will review the completed internal audit report and raise corrective actions using the EMS Action System.

All audit results will be reviewed at the next management review meeting.

References:

PW-F-01	Audit schedule
PW-F-02	EMS Issue and Action System
PW-F-03	Internal Audit Report
PW-F-04	Audit Notes
PW-F-13	Subcontractor Self Evaluation Audit Checklist
PW-P-03	Internal Audit procedure

7.0 Planning

Aim

The company's objective is to ensure that the Environmental Management System is planned by management in order to meet the requirements of the Environmental Management Systems as well as stated objectives.

We achieve this by;

- Ensuring that the integrity of the Environmental Management System is maintained when changes to the Environmental Management System are planned and implemented;
- Reviewing of all stages of the Environmental Management System on a six monthly basis to ensure integrity when changes are planned and implemented;
- Ensuring that the Environmental Management System is communicated to all operators and that they understand their role in working with others to achieve Panelwall's goals and objectives;
- The dissemination and implementation of procedures and work instructions throughout the Company to generate consistent practice and achieve the desired outcomes;
- The resources allocated to achieve EMS initiatives as required;
- Management and staff meetings that include consideration of EMS issues and their impact on Panelwall.

Process

Panelwall ensures sufficient planning by senior management is undertaken. Measurable environmental objectives, consistent with the environmental policy, including the commitment to continual improvement, are established and monitored.

7.1 Legislation and other requirements

Aim

To establish and maintain a library of Legislative requirements for head office.

Procedure

Panelwall will establish and maintain methods to obtain current legislation as detailed below as per Audit schedule PW-F-01 and register PW-R-04.

NSW Legislation & Regulations:

- Contaminated Land Management Act 1997

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+140+1997+first+0+N>

- Environmental Trust Act 1998

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+82+1998+cd+0+N>

- Environmentally Hazardous Chemicals Act 1985

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+14+1985+cd+0+N>

- National Environment Protection Council (New South Wales) Act 1995

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+4+1995+cd+0+N>

- Ozone Protection Act 1989

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+208+1989+cd+0+N>

- Protection of the Environment Administration Act 1991

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+60+1991+cd+0+N>

- Protection of the Environment Operations Act 1997 (POEO Act)

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+156+1997+cd+0+N>

- Waste Avoidance and Resource Recovery Act 2001

<http://www.legislation.nsw.gov.au/viewtop/inforce/act+58+2001+cd+0+N>

- Contaminated Land Management Regulation 1998

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+355+2008+cd+0+N>

- Environmentally Hazardous Chemicals Regulation 1999

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+358+2008+cd+0+N>

- Protection of the Environment Administration Regulation 2007

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+294+2007+cd+0+N/>

- Protection of the Environment Operations (Clean Air) Regulation 2010

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+428+2010+cd+0+N/>

- Protection of the Environment Operations (General) Regulation 2009

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+211+2009+cd+0+N/>

- Protection of the Environment Operations (Noise Control) Regulation 2008

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+40+2008+cd+0+N/>

- Protection of the Environment Operations (Waste) Regulation 2005

<http://www.legislation.nsw.gov.au/viewtop/inforce/subordleg+497+2005+cd+0+N/>

The Environmental Management Representative will ensure a reference library is established at the office. The library shall be established in a location where access is available to all project personnel.

As a minimum the library shall include:

- Relevant Legislation, regulations and Codes of Practice
- Referenced Australian Standards (if applicable)
- Material Safety Data Sheets (If applicable)
- Procedures

The library shall be coordinated and maintained by the Panelwall EMS Representative or a person nominated by the EMS Representative. The Panelwall EMS Representative shall check for updates to all of the relevant Legislation listed above as per the audit schedule on PW-F-01 and as per registerPW-R-04 and ensure updates are downloaded and updated on the server.

Where appropriate software or Internet versions of material, i.e. Legislation, may replace hard copies providing the information to Printer/Digital specialists or office staff through electronic version.

When working under a Principal contractor Panelwall and its subcontractors will follow the Principals EMS and subsequent state legislation.

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When working outside Australia, specific legislation and regulations will be made available to all applicable Subcontractors.

Material Safety Data Sheets (MSDS) for all chemicals used within Panelwall are maintained by the Management Representative or nominated personnel. The MSDS list is to be reviewed biennially to ensure all sheets remain current.

7.1.1 Relevant Authorities

Contact with the external parties will as per the external communication process at section 9.3.

Queensland

Department of Environment and Resource (EPA) <http://www.derm.qld.gov.au>,

New South Wales

Department of Environment, climate and water www.environment.nsw.gov.au

Northern Territory

Environmental protection Authority www.epa.nt.gov.au

ACT

Environmental Protection Authority www.environment.act.gov.au

Victoria

Environmental Protection Agency www.epa.vic.gov.au

Western Australia

Environmental Protection Authority www.epa.wa.gov.au

Tasmania

Environmental Protection Authority www.epa.tas.gov.au

7.2 Environmental Aspects and Impacts

Initial Environmental Review

Panelwall does not operate out of a singular office, as all business operations are subcontracted. Panelwall meet and discuss business arrangements at the office of LB interiors. An initial environmental and safety review is to be completed at LB interiors office and storage unit owned by Panelwall's at Peakhurst, Sydney.

The reviews will identify, examine, evaluate and control those aspects of its activities and Panelwall will ensure that significant impacts are considered in setting its environmental objectives.

The Initial Environmental Review will take into account the consideration of normal and abnormal operations, and include the following:

- Panelwall's main operational processes;
- Panelwall's main suppliers and subcontractors;
- Disposal of the companies waste products;
- The identification of legislative and regulatory requirements relevant to the operations;
- Existing management practices and procedures;
- Existing policies and procedures dealing with purchasing and contracting activities;
- Previous incidents of non-compliance and non-conformance;
- The views of interested parties;
- The functions or activities of other organisations that can enable or impede Panelwall's environmental performance;
- The identification of all environmental aspects.

Reference:

PW-F-08 Initial Environmental and Safety Review

Environmental Aspects

Environmental Aspects are identified and recorded to examine the potential impact on the environment such as accidental spillage or carbon emissions.

Environmental aspects associated with typical Panelwall operations, are as follows:

- Compliance with regulations;

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- Water;
- Water run-off;
- Noise and vibration;
- Chemicals to be held on site;
- Air;
- Land contamination;
- Energy usage;
- Visual impact;
- Access & egress;
- Waste.

Following the identification of all aspects there will be an analysis of the associated impacts. Appropriate assessment, action to be determined and controls implemented are required to remove or reduce the environmental impact.

References

- PW-F-09 Risk Assessment
- PW-F-08 Initial Environmental and Safety Review

Analysis of impacts

On completion of the identification of all environmental aspects, an analysis is to be carried out on the associated impacts and action is to be taken to remove or reduce those impacts.

In determining appropriate action, consideration is to be given to:

- The potential regulatory and legal exposure;
- How difficult will changing the impact be and at what cost;
- What impact and affect will changes make on the other companies activities or processes;
- What are the concerns of other interested parties;
- How will actions change the public image of the Company;
- What period is required to change the impact?

Following the assessment, the company's objectives and targets are to be determined and documented on the EMS Improvement plan.

The EMS Management Representative may wish to initiate an EMS action to ensure effective action is undertaken and recorded.

A risk assessment will be performed if required using the risk assessment matrix and recorded on a blank risk assessment form.

References

PW-F-09 Risk Assessment Form

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Risk Assessment Matrix

Risk Matrix

		Probability				
		A	B	C	D	E
Maximum Reasonable Consequence	1	1	2	4	7	11
	2	3	5	8	12	16
	3	6	9	13	17	20
	4	10	14	18	21	23
	5	15	19	22	24	25

Maximum Reasonable Consequence

- 1 Extreme
- 2 Very High
- 3 High
- 4 Medium
- 5 Low

Probability (P)

Code	Probability
A	Almost certain to happen (everyday/weekly event)
B	Likely to happen at some point (typically once a month)
C	Moderate: possible, heard of so it might happen (typically once a year)
D	Unlikely: not likely to happen (typically once every five years)
E	Rare: practically impossible (typically once every twenty five years)

Risk

Classification

1 – 6	= (H) High- Risk Senior management attention needed to control the risk, senior management needs to be involved
7 – 15	= (M) Medium Risk - Complete risk assessment. Identify hazards and implement controls. Management responsibility must be specified
16 – 25	= (L) Low Risk - Identify hazards and implement controls. Manage by routine processes

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The following list briefly highlights the environmental issues that may present a risk to the environment:

<i>Environmental Impact:</i>	<i>Possible sources:</i>
<i>Environmental Risks</i>	<i>Identified during the Risk Assessment process.</i>
<i>Air Pollution</i>	<i>Industrial plant or processes, contaminated soil, landfill or waste storage areas.</i>
<i>Dust</i>	<i>Excavations, earthworks, demolition, materials handling.</i>
<i>Mud/Soil.</i>	<i>Vehicle movements on and off site.</i>
<i>Chemical Waste</i>	<i>Industrial processes, materials used on site. Trade waste neutralizing chambers.</i>
<i>Hazardous Materials</i>	<i>Chemical, toxic, radioactive or biological waste matter or processes. Fuel or chemical storage facilities.</i>
<i>Site Contamination</i>	<i>Industrial or chemical waste, oils, solvents, heavy metals, sewage, decomposing material, birds or animals.</i>
<i>Noise Pollution</i>	<i>Demolition or construction operations. Facility operation after completion (i.e., air conditioning plant)</i>
<i>Silt carryover into Storm Water.</i>	<i>Surface water runoff from rainfall or groundwater from excavations.</i>
<i>Storm water surcharge of sewer system.</i>	<i>Flooding of site area.</i>
<i>Trade Waste (Sewer)</i>	<i>Construction process or facility operations after handover.</i>
<i>Waste (Demolition)</i>	<i>Site Clearance and Demolition works.</i>
<i>Waste (Construction)</i>	<i>Construction and fitout activities.</i>
<i>Heritage Degradation</i>	<i>Unauthorised destruction of European or Aboriginal Heritage.</i>
<i>Water</i>	<i>Contamination of clean water system with salts or suspended solids etc, Degradation of Amenity, Contamination of Ground Water.</i>
<i>Preservation Instructions.</i>	<i>Requirement to protect trees, existing vegetation, animal habitats or the like.</i>

Continual Identification of Environmental and Safety Impacts

Significant environmental impacts are initially identified by means of the Initial Environmental and Safety Review; the EMS Management Representative carries out continual reviews on an annual basis to ensure methods to control impacts are effective.

Records of yearly assessments at Head office are to be retained within the EMS documentation.

When completing the yearly assessments, the EMS Management Representative is to report on both positive and negative conditions found and particular consideration must be given to operations under both normal and abnormal operating conditions, emergency situations, current, past and future activities.

The occurrence of:

- Controlled and uncontrolled emissions to the atmosphere;
- Controlled and uncontrolled discharges to water;
- Solid and other wastes;

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- Contamination of land;
- Noise, odor, dust, vibration and visible impact;
- Incidents and accidents (environment);
- Changes to the environment;
- Changes in legislation.

The use of:

- Land, water, fuels and energy, and other natural resources;
- Unsafe work practices;
- New equipment.

The effects on:

- Effects on specific parts of the environment, including ecosystems;
- Health and welfare of staff;
- Quality of service and environmental contractual requirements.

The monitoring and reporting of environmental impacts and occurrences must not be dependent on planned annual inspections. It is the responsibility of all personnel to report any departures from environment practices through the reporting methods defined in the EMS (raising an EMS Issue and action form).

Panelwall will ensure all employees are trained in identification and reporting of environmental incidents and hazards.

The EMS Management Representative is responsible for evaluating significant environmental impacts considering the environmental policy, operating systems and relevant legislation. The EMS Management Representative is to examine information and data received and, after evaluation, take appropriate and timely action.

References

- PW-F-05 Annual Environmental Checklist
- PW-F-02 EMS Issue and Action Form

7.3 Environmental Objective, Targets and Improvement Plan

Environmental Objectives & Targets

Environmental objectives and targets are derived from a consideration of the following:

- Initial Environmental Review
- Management Review
- Environmental incidents
- Risk Assessments
- Relevant legislative and regulatory requirements
- Environmental Policy
- Financial, operational and business requirements
- The view of relevant interested parties

The Directors of Panelwall establish environmental objectives, and targets. Major and significant objectives and targets are recorded on the EMS Improvement Plan. This allows monitoring of the identified major and significant environmental aspects and impacts and setting environmental objectives and targets. These objectives, combined with the EMS Issue and Action system ensures that Panelwall continually monitor all elements that have been identified and included within the EMS Improvement Plan.

Environmental Management System objectives and targets are to be achievable, relevant to the Company's operations and need to be measurable and consistent with the Company's EMS policy. The EMS Improvement Plan is reviewed by the EMS Representative on a quarterly basis and presented to the Directors at the management review.

Panelwall's principle Environmental objectives are:

- To become one of the leading suppliers of environmentally sustainable solutions for the corporate office and retail environments in Australia.
- To reduce the occurrence of environmental non-conformances and to prevent reoccurrences through Subcontractor Management.
- To obtain ISO 14001 certification by March 2011.

- To increase the awareness and participation of subcontractors within the EMS

In order to meet these objectives, targets are set and monitored at the management review meetings.

Reference

PW-R-04 EMS Improvement Plan
PW-F-02 EMS Issue and Action Form

EMS Improvement Plan

The EMS Improvement Plan will be maintained and held electronically in the EMS system documentation, by the EMS Representative. The purpose is to identify and set objectives and targets. It is reviewed by the EMS Representative on a monthly basis, and presented to senior management at the Management Review.

The EMS Improvement Plan describes all improvement goals set by senior management for the business. These goals may be identified through any of the following:

- Senior management strategy planning;
- Significant non-conformances and corrective actions;
- Management review meetings;
- Internal and external audit reports;
- Environmental impacts.

The EMS Improvement Plan identifies the particular improvement targets, target dates, person responsible and a record of improvements made. It is a continually changing document, which will be reviewed as goals are realised and new targets set.

Only the Managing Directors may close out items identified within the plan, once satisfied that the goals have been met.

References

PW-R-04 EMS Improvement Plan

8.0 Operations

8.1 Operational Control

Aim

Panelwall plans and controls processes needed to provide environmentally sustainable solutions for the corporate office and retail environments through demountable partitions. Environmental objectives and requirements for the product are defined within the quote specifications supplied by the client.

Procedure

Panelwall plans and controls operations to ensure all processes and activities meet the requirement of the client and are performed in a safe and environmentally friendly manner. Panelwall controls its operations by:

Project Checklist

All new projects will have a Project Checklist (PW-F-14) attached that outlines the location of the projects (applicable legislation), EMS contract requirements and preferred subcontractors to use for specific project.

Subcontractor responsibilities

Ensuring all subcontractors understand their roles and responsibilities with respect to all environmental issues.

Competence awareness and training

All subcontractors are inducted and records of inductions are maintained. Panelwall will induct subcontractors to increase the Companies awareness of the potential consequences of deviation from specified environmental practices and procedures.

Legislation, regulations and codes of practice

Ensuring all Panelwall operations comply with legal and regularity requirements and codes of practice.

Monitoring and measuring of subcontractors

Panelwall continually monitors and evaluates its subcontractor performance against client contractual requirements and the performance of the EMS. This is completed

through annual subcontractor evaluation and an external audit of the manufacturing and administration services.

Control of subcontractors and suppliers

Procedure

- Assess each subcontractor or supplier, minimally on an annual basis (Purchasing section 8.3). The decision to assess each subcontractor further must be based on the subcontractor's ability to deliver complying work in accordance with Panelwall's EMS.
- Prepare a program to monitor all Subcontractors through internal auditing (Internal auditing section 6.3).
- Monitoring of Subcontractors must address any or all of the following:
 - Performance
 - Operational Controls
 - Conformance with Panelwalls EMS
 - Environmental performance
- Prepare a record of each assessment and issue to the subcontractor for review.
- Follow up non-compliances within a reasonable time frame.

When working under a principal contractor, Panelwall will provide a subcontractor that has been inducted into Panelwall's Environmental Management System. It is also a requirement that the subcontractor work under the principal contractors Environmental Management System and that this is understood and complied with.

Reference

PW-F-12	Subcontractor Evaluation Form
PW-F-13	Subcontractor Self Evaluation Audit Checklist

8.2 Emergency Preparedness and Response

Aim

Panelwall has established and maintains documented procedures to identify potential accidents and emergency situations and provide the most appropriate response and action plans to prevent environmental impacts.

Panelwall always works under the subcontractors or principals' contractors' emergency plans. If required Panelwall will develop Emergency plans for a subcontractor to comply with the EMS.

Procedure

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Procedures are developed if a subcontractor or principal contractor does not have site-specific emergency procedures to satisfy Panelwall's requirements.

Any off-site incidents such as vehicle accidents are to be communicated, in the first instance, to the EMS representative or any Director. The Emergency Plan outlines details of actions to be taken in the event of an off-site emergency or incident.

Panelwall will ensure through operational control that designated, subcontracted employees are trained in emergency procedures and spill response.

Possible emergencies include:

- Site evacuation;
- Fire;
- Chemical leakage;
- Gas leak;
- Medical emergency;
- Structural Collapse;
- Failure of environmental control structures;
- Traveling – Vehicle.

Panelwall and Subcontractors are to test Emergency plans annually as scheduled by the EMS Representative and recorded accordingly. Emergency plans are to be amended, where required, following testing and as a result of lessons learnt from actual emergencies.

Relevant procedures for dealing with emergency situations are to be appropriately reviewed for effectiveness following an environmental incident and amendments made where required.

Suggestions for improvement to the Emergency Plans are to be passed to the EMS Representative.

Reference

- PW-F-10 Emergency Plans
- PW-F-11 Emergency Plan Testing

8.3 Purchasing

Aim

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Panelwall has adopted processes to ensure suppliers and contractors who may have an environmental impact comply with Panelwall’s Environmental Policy.

Suppliers and contractors are to be encouraged to develop their products and operations to be consistent with the Companies Environmental Policy.

Procedure

Suppliers and contractors to Panelwall with a potential environmental impact for current projects are inducted and given Panelwall’s Environmental Policy and requested to comply with its philosophies all other suppliers that are no longer needed can be removed from the supplier list and re added as needed and this list shall be reviewed at a management meeting. There is particular emphasis on those suppliers and contractors providing items likely to have a significant environmental impact. This is reviewed through subcontractor evaluation. Suppliers not in use shall have existing information for them stored in the folder Old Suppliers kept on the server in the Supplier/Evaluation directory, should the supplier become active again they will be assessed as new suppliers.

The selection methods, review and approval of suppliers will be based on the following criteria:

Scoring Guidelines	A	B	C	D
Environment	Has a certified EMS (14001)	Has an environmental policy	Commitment to working towards Panelwall’s EMS	Disinterested in the EMS
Operational Control	Has written procedures to control environmental impacts and evidence of controls	Has written procedures to control environmental impacts	Commitment to working towards Panelwall’s EMS	Disinterested in the EMS
Legislative requirements	The Company can demonstrate that it is aware of its legal obligations concerning environmental protection	Commitment to working towards Panelwall’s EMS and legislative requirements	Aware of legislative requirements but does implement requirements within the Company	Disinterested in Environmental legislation
Induction	Is committed and is following Panelwall’s EMS requirements	Has returned documentation and is committed to working alongside Panelwall’s EMS	Is completing the induction but has not returned the documentation	Disinterested in the EMS
Audit	Has completed a subcontractor audit with no issue an actions raised	Has completed a subcontractor audit with some issue an actions raised	An audit has yet to be completed	Disinterested in an environmental audit

Should suppliers or contractors fail to meet environmental requirements established by the Panelwall, a nonconformance (Issue and Action) is to be raised (Section 6.1).

Unacceptable Suppliers or Contractors

Should a D score be allocated to any supplier or contractor under any classification, this score is to be used to initiate discussion with the supplier/contractor in an endeavor to improve performance.

Should any supplier/contractor be assessed as unacceptable (a relative judgment made by those conducting the assessment) then a note is to be made in the accounting systems for that supplier/contractor not to be used.

The Supplier Assessment ratings will be updated at anytime if a supplier or contractor's performance becomes inadequate. Re-assessment of the supplier/contractor's score will be considered and changes made to the Approved Supplier List after consideration of the score.

Approved Suppliers/Subcontractor List

A Preferred Supplier Register (preferred supplier list) is available (with supplier evaluation results) for staff to view and to review at Management meetings.

Performance of suppliers and subcontractors will be reviewed at the Management Review meetings. The supplier evaluation is performed annually by the EMS Representative and reviewed at the Management Review Meeting; the Directors approve the list.

Reference:

PW-F-02	EMS Issue and Action Form
PW-F-12	Subcontractor Evaluation Form
PW-R-02	Preferred Suppliers Register

8.4 Monitoring and Measuring

Aim

Panelwall has established and maintains procedures for verification of compliance to specified requirements and for the establishment and maintenance of monitoring records. Panelwall does not hold any equipment that requires calibration or verification. Subcontractors will be controlled as per Operational Control section 8.1.

Procedure

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This procedure describes the system in place for measuring and monitoring actual performance against Panelwalls environmental objectives and targets in all areas of the EMS, operational processes and relevant Acts and Regulations.

This procedure relates to the systems in place for taking actual measurements of these process characteristics and regulatory requirements. Selected Subcontractors are to present their yearly records for waste, water, gas usage and electricity to show a commitment to Panelwalls EMS. The results of measurements are to be analysed and used to determine success and to identify activities requiring corrective action.

Records are to be maintained within the subcontractor's file for annual review.

9.0 Information Management

9.1 Document Control

Aim

To control documentation contained within the EMS, Panelwall will ensure that relevant documents are revised and approved by authorised personnel, prior to release.

Procedure

All EMS documents issued by the Environmental Representative are to be controlled.

The Managing Directors approve all documents contained within the EMS. The EMS documentation will be electronically stored, read only and password protected.

The EMS manual contains an amendment sheet for recording changes to the EMS manual. This amendment sheet identifies the document name, date and details of all revisions. A list of forms, registers and procedures is contained within Annex A of the EMS manual and details the revision status.

Requests for changes to documents will be activated via the EMS Action System. Should the requested changes be approved, notification will be given to the EMS Representative and a revised document issued. When changes to documents occur then the EMS Representative is to ensure that all obsolete printed copies are identified and destroyed.

Documents will be controlled as described by this procedure. The following basic principles will be used to simplify the control of documents:

- Minimise the number of copies of any document and use central copies where possible.
- Use centrally kept electronic versions of forms to ensure the current versions are always used. The EMS Representative will maintain these electronic versions.
- Electronic versions of Standards will be the master versions and printed copies deemed uncontrolled.

9.2 Record Control

The EMS Management Representative maintains the record master list, as shown below, which details what records are kept, where records are stored, how records are archived and their retention times.

All stored records must be readily retrievable, identifiable and legible. Records are stored for a period nominated on the record master list, taking into consideration the Company's requirements and legislation.

Hard copy (paper) records are to be destroyed and disposed of by shredding and deposited within a recycling bin. Digital records are to be electronically deleted as per the Record Master List.

Records shall be produced and maintained to provide evidence of conformity to requirements and of the effective operation of the Environmental Management System. They shall be legible, readily identifiable and retrievable.

Record Master List

Record Name	Location	Retention Time	Archive Location
Action System (Non-Conformity, Corrective and Prevention action)	Administration	Indefinitely	Computer Server
Audits	Administration	Indefinitely	Computer Server
Management Review	Administration	Indefinitely	Computer Server
Emergency plans	Administration	Indefinitely	Computer Server
Communication	Administration	Indefinitely	Computer Server
Competence and Training	Administration	Indefinitely	Computer Server
Risk Assessments	Administration	Indefinitely	Computer Server
Communication	Administration	Indefinitely	Computer Server
Subcontractor/Supplier reviews			
Environmental Improvement Plan	Administration	Indefinitely	Computer Server

9.3 Communications

Aim

To establish and maintain effective communication both internally and externally, thus ensuring the successful operation of Panelwall.

Procedure

Internal communication

The methods associated with internal communication have been established by not only communicating the Environmental Policy, Goals and the EMS Manual, but also non-conformance results and environmental issues.

Communication methods include:

- Management Review Meetings;
- Contract meetings;
- Informal discussion;
- Email
- Skype

External communication

Panelwall maintains records of communication from applicable and relevant interested parties concerning Environmental Impacts. Panelwall will report to external parties any significant Environmental issues.

All communication regarding environmental issues is to be directed in the first instance to the Managing Directors who will decide on a course of action and the correct method of response.

Only the Managing Directors have the authority to communicate to the specific State Environmental Protection Agency, Local Council, Media and the public.

No other staff members permitted to communicate externally except with the approval of the Managing Directors.

All forms of communication relating to environmental matters are to be retained on file with the appropriate response recorded.

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Annex A

Forms

Number	Title	Issue	Date
PW-F-01	Internal Audit Schedule	1	20/2/11
PW-F-02	EMS Issue and Action	1	20/2/11
PW-F-03	Internal Audit Report	1	20/2/11
PW-F-04	Audit Report Notes	1	20/2/11
PW-F-05	Annual Environmental Checklist	1	20/2/11
PW-F-06	Management Review Meeting Minutes	1	20/2/11
PW-F-07	Subcontractor Environmental Induction	1	20/2/11
PW-F-08	Initial Environmental & Safety Review	1	20/2/11
PW-F-09	Risk Assessment Form	1	20/2/11
PW-F-10	Emergency Plans	1	20/2/11
PW-F-11	Emergency Plan Testing	1	20/2/11
PW-F-12	Subcontractor Evaluation Form	1	20/2/11
PW-F-13	Subcontractor Self Evaluation Audit Checklist	1	21/3/11
PW-F-14	Project Checklist	1	20/2/11

Registers

Number	Title	Issue	Date
PW-R-01	EMS Action Register	1	20/2/11
PW-R-02	Preferred Suppliers Register	1	20/2/11
PW-R-03	Subcontractor Induction and Audit Matrix	1	20/2/11
PW-R-04	EMS Improvement Plan	1	20/2/11

Procedures

Number	Title	Issue	Date
PW-P-01	EMS Management Review	1	20/2/11
PW-P-02	Corrective and Preventive Action	1	20/2/11
PW-P-03	Internal audits	1	20/2/11

Environmental Management Works Procedures

Number	Title	Issue	Date
PW-WP-01	Air Quality (controlled substances) Management Work Procedure	1	20/2/11
PW-WP-02	Noise & Vibration Management Work Procedure	1	20/2/11
PW-WP-03	Dust Management Work Procedure	1	20/2/11
PW-WP-04	Environment Management Work Procedure	1	20/2/11
PW-WP-05	Waste Management Work Procedure	1	20/2/11
PW-WP-06	Water Management Work Procedure	1	20/2/11