



CBC

BUILDING & SERVICING AUSTRALIA WIDE

 CBC FACILITIES MAINTENANCE

CBC Facilities Maintenance Pty Ltd Environmental Management System ISO14001:2016


















TABLE OF CONTENTS

Revision history log	3
Approval	3
Standards and Guidelines	4
1 Terms and Definitions	4
2 INTRODUCTION	6
3 PURPOSE	6
3.1 Principles of Environmental Management Practice	7
3.2 Identification and Allocation of Costs and Benefits	7
4 CONTEXT OF THE BUSINESS	8
4.1 Understanding the Organisation and its Context	8
4.2 Understanding the Needs and Expectations of Interested Parties	8
4.2.1 Decision Making	8
4.3 Determining the Scope of the Environmental Management System	9
4.4 Environmental Management System	10
5 LEADERSHIP	12
5.1 Leadership and Commitment	12
5.2 Environmental Management Policy	12
5.3 Roles, Responsibilities and Authorities	12
6 PLANNING	17
6.1 Actions to address Aspects and Impacts for the EMS	17
6.1.1 General	17
6.1.2 Environmental Aspects	17
6.1.3 Compliance Obligations	18
6.1.4 Planning Action	18
6.2 EM OBJECTIVES AND TARGETS PLANNING	19
6.2.1 EM Objectives	19
6.2.2 Planning to Achieve Environmental Management Objectives	20
7 SUPPORT	23
7.1 Resources	23
7.2 Competence	23
7.3 Awareness	25
7.4 Communication	26
7.4.1 General	26
7.4.2 Internal Communication	26
7.4.3 External Communication	27
7.5 Documented Information	27
7.5.1 General	27
7.5.2 Creating and Updating	27
7.5.3 Controlled Documented Information	28
8 OPERATION	29
8.1 Operational Planning and Control	29
8.2 Emergency Preparedness and response	31
9 PERFORMNCE EVALUATION	32
9.1 Monitoring, Measurement, Analysis and Evaluation	32
9.1.1 General	32
9.1.2 Evaluation of Compliance	32
9.2 Internal Audit	33
9.2.1 General	33
9.2.2 Internal Audit Program	34
9.3 Management Review	34
10 IMPROVEMENT	36
10.1 General	36
10.2 Nonconformity and Corrective Action	36
10.3 Continual Improvement	38

Revision history log

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2	14/01/2019	Updated after external audit
3	15/07/2019	Updated to new formatting
4	19/08/2019	Updated after external audit
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Approval

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1	01/06/2018	P. Calder		N.McGregor		E. Morelli	
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5	19/04/2021	P. Calder		N.McGregor		E. Morelli	

Standards and Guidelines

AS/NZS ISO 14001:2016 Environmental Management System requirements.

1 Terms and Definitions

Term	Definition
AS/NZS ISO14001	Environmental Management Systems requirements Australian/New Zealand Standard
Audit	A systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent of which audit criteria are fulfilled (AS/NZS ISO 14001:2016) Systematic, independent and documented process for obtaining evidence of conformity to a set of standards and evaluation to determine the extent of compliance.
Audit Evidence:	Documentation, Statements, and Records.
Checklist	Documented list of items to be inspected, checked or verified by signature.
Client	The other party to the contract that is paying CBC for the work. Commonly nominated as Owner, Principal, Proprietor or Company, as defined in the contract.
Corrective Action	Action to eliminate and control the cause of identified non-conformance to the EMS.
Continual Improvement	Consistent review of the Environmental system to identify opportunities for enhancement.
Contractor	Organisation engaged by CBC to carry out works as required.
Controlled Copy	An issue of a document or item which has its details of issue, revision and document type recorded or registered.
Documented Information	All controlled documentation that is developed by CBC is required to have developed a plan and implemented process for: <ul style="list-style-type: none"> • Distribution, access, retrieval and use; • Storage and preservation, including the preservation of legibility (managing documented records of the company's work); • Change Control; • Retention and disposal in line with regulatory requirements (also a requirement of managing documented information in the form of records).
Emergency	Unplanned or unexpected event that needs the urgent application of specific competencies, resources or processes to prevent or mitigate their actual or potential consequences. Emergency situations can result in adverse environmental impacts or other effects on the organisation.
EMS	Environmental Management System
Environmental aspect	An element of a company's activities, products, or services that may or does create an environmental impact.
Environmental impact	Any change to the environment, whether adverse or beneficial, resulting from a company's activities, products, or services.
HSEQ Plan	Health Safety Environmental and Quality Plan. This is a project/contract specific plan developed when requested by the client.
Management Team	This is made up of the critical decision makers for the organisation. Each member of the management team will concentrate on his or her own area of

Term	Definition
	expertise to provide input. There may be more than one management team or, an individual may be a member of multiple management team.
Non-conformity	Non-fulfilment of a requirement.
Process	The implementation of tasks to convert inputs into the delivery of outputs.
Product and Services	Defined as the outputs that CBC delivers to meet the Clients' requirements. Product is a physical outcome of a process whilst service is the movement or doing actions to meet the Clients.' Requirements.
Supplier	Supplier engaged under a Purchase Order, or Contractor engaged under Contract.
Uncontrolled document	These are documents that are produced for information only and are not formally reviewed, maintained, subject to change review, or approved prior to release. They do not have traceable distribution. They should be identified as "uncontrolled". <i>Note: A controlled document may be "uncontrolled" once printed" but must be labelled as such.</i>
WHSEQ Manager	Is CBC's WHS representative for all contracts/projects and is CBC's Management Representative

2 INTRODUCTION

An effective Environmental Management System (EMS) provides a comprehensive and structured approach to long-term planning of Environmental management activities. This enables CBC Facilities Maintenance (CBC) to demonstrate our commitment to client satisfaction and achieve performance objectives. Our EMS comprises of all aspects of Environment maintenance, including personnel, data and software systems, resourcing, the physical delivery of Environmental management and the long-term provision of both routine and periodic maintenance of our client's facilities.

The EMS provides the framework of expectations developed and to ensure that Environmental management expectations and duties are understood and discharged, whilst facilitating continual improvement in Environmental management performance.

The EMS enables CBC to address:

- the planned allocation of resources,
- the identification and assignment of responsibilities; and
- the ongoing evaluation of practices, procedures and processes as part of the continual improvement and performance evaluation processes.

This Environment Management System applies to CBC Contracts or Projects where the client has requested CBC to carry out works on their behalf.

The Environmental Management System and HSEQ Plan are controlled documents relating to CBC Facilities Maintenance Pty Ltd operating from 25 Military Road, Port Kembla.

The services provided by CBC under the scope of the Environmental Management System are:

- Facilities Maintenance –
 - Essential Services: - Fire, Electrical, Mechanical, Hydraulic, Vertical Transport, Kitchen Equipment Maintenance.
 - Building Maintenance: - Garden Maintenance, Cleaning Services, Refurbishments, Waste Management, Property Services.
 - Consulting Services: Strata Inspections, Condition Inspections, Maintenance Scheduling, Compliance Certification, Project Management.

Where required a Project/ Contract Health, Safety, Environmental and Quality Plan (HSEQ) will be developed as per CBC Project Set Up Procedure CBC-PROC-097. For minor/smaller projects/ contracts CBC will utilise its Environmental Management System as identified in CBC-PROC-097.

3 PURPOSE

In accordance with ISO 14001:2016 Environmental Management – Management System Requirements, hereinafter referred to as the Standard, our EMS is documented information that specifies the following:

- How organisational objectives are to be converted into Environmental Management objectives,
- The approach for developing HSESQ plans, and

The purpose of the EMS is to develop an approach and methodology to facilitate the systematic management of the works associated within the scope of our client's contract requirements to develop, maintain and implement controls that enable CBC to meet objectives and targets for Environmental management.

3.1 Principles of Environmental Management Practice

Key to the CBC's operations are simple basic principles that help keep the objectives grounded to CBC service delivery. These simple principles help in planning and examination of performance of the business.

In order to derive value, there are seven Environmental management principles to be addressed:

- Customer Focus
- Leadership
- Engagement of people
- Process approach
- Continuous Improvement
- Evidence based decision making
- Relationship management

3.2 Identification and Allocation of Costs and Benefits

Defining the boundaries of what constitutes the delivery of Environmental management, will require consideration by CBC for the identification and allocation of costs and benefits, for determining baseline costs and during the development and operation of the contract/project required HSEQ Plan. This is likely to include the tools and resources required, the activities undertaken and the parts of the organisation which are involved.

It is likely that costs and benefits will not be directly aligned within the various component's elements of the contract/project specific HSEQ Plan, and the respective elements of the Standard, i.e. costs incurred in one area (e.g. Planning) may give rise to benefits in another (e.g. Operation).

4 CONTEXT OF THE BUSINESS

4.1 Understanding the Organisation and its Context

All external and internal issues that affect both the achievement of the organisational goals and the Environmental management system are to be identified. The Management Team of the company determines the management of the external and internal issues that have an impact on the products and/or service that we deliver to our Clients.

To understand the external issues, the Management Team will monitor and consider issues coming from:

- Legal and legislative requirements
- Technology changes
- Customer needs
- Market competition
- Cultural, social and the economic environmental management on an international, country wide, regional or local level

To understand the internal issues, the Management Team will monitor and consider issues coming from:

- The company's values
- The company's culture and ways of operating
- The company's intellectual property
- The ongoing performance of the company against plans, objectives and targets
- The competency of personnel

The EMS has been prepared in alignment with the Policy and objectives, as it is used as part of the annual review process.

4.2 Understanding the Needs and Expectations of Interested Parties

CBC has established a process of identifying the individuals or groups that are likely to affect or be affected by the EMS. Stakeholders are assessed by their ability to influence the EMS, along with the power they have within the EMS.

The context of the Organisation register provides corporate level guidance for determining stakeholder needs and expectations. Contractual requirements are the principle method for communicating, understanding and agreeing principle stakeholder (client) needs. The Facilities Manager is to maintain listings and needs analysis data for Environmental Management for a project. Client needs are to be listed and maintained within the HSEQ Plan.

4.2.1 Decision Making

The details for decision making vary, depending on the client's requirements and contractual arrangement that CBC's involved with. The key principle followed in the decision-making process:

- Recognise the interconnected impacts of the decision making across Levels of Service provision.

CBC drives a focus on Zero Harm and delivery performance as the core of the business whilst recognising the importance of aligned behaviours and relationships. The element of thought leadership looks for continuous improvement that drives better customer outcomes.

The following decision-making criteria priority sets out the overall approach:

- Contract obligations and targets
- Environmental level principles
- Definition of level of service

Contractual Obligations and Targets

Legally binding commitments to the client form CBC's involvement in the management of the Environment defines the following items.

This criterion is highly attended in:

- Environmental performance monitoring principles based on CBC-PROC-057 Monitoring and Measuring Procedure
- Contract specific performance monitoring defined in HSEQ Plan

Environmental Level Principles

It is important to understand the guiding principles to the specific Environmental requirements. For example, are decisions constrained by budget so Environmental condition is maximised for that budget or is the driver to maintain a defined Environmental condition for the least cost.

Definition of the Level of Service

The definition of the Level of Service for Environmental Management allows a more detailed view of how different elements can be handled, balancing the usage with condition and associated safety / usage risks. Understanding the detailed view of the service expectation allows a Level of Service refinement to be made for prioritisation.

4.3 Determining the Scope of the Environmental Management System

General

The scope of the EMS covers the delivery of products and /or services offered by CBC.

As a provider of services to clients, CBC delivers a wide range of solutions based on varying Contract models and defined Levels of Service. The scope of the works is limited to the Environmental requirements included in the Contract.

The EMS requires the scope of each project is to be reflected within the Project HSEQ Plans.

EMS Requirements

The HSEQ Plan requires the determination of the boundaries and applicability of the EMS to Contracts

For EMS the scope of the Environmental management system includes:

- 1 The service and/or products managed by the CBC and their interrelationships, and the level of granularity (Length of Sections) at which they are managed.
- 2 Environmental portfolio of projects falling under the scope of the EMS is defined in Contract/Project Specific HSEQ Plan
- 3 The business processes and Environmental management activities that fall within the scope of the Environmental management system, or that interface with it (for example Environmental management systems, financial processes, procurement and contract management processes will have an interrelationship with it).

The EMS is a three-level system that comprises of:

1. Policy and EMS
2. Project HSEQ Plans
3. CBC CMMS and work instructions

The EMS is divided into sections that align with the Standard from Section 5 onwards there are three headings as follows:

- **General** – provides an understanding of the overview and expectations
- **Tactical** – contains systematic expectations for the EMS, the Tactical Level Environmental management expectations for operations
- **Operational** – describes considerations to successfully implement the systematic and Environmental management expectations at the Operational Level and meet the expectations of our clients

The principle means of systematic and operational control within the EMS is through the development and implementation of guidelines, procedures, management plans and work instructions. These documents contain information and instruction for employees regarding tasks and duties. The EMS, Contract requirements and the Standard requirements provide inputs to the EMS Documentation which include:

- EMS
- Project HSEQ Plan
- Context of the Organisation Register
- Legal & Other Requirements Register

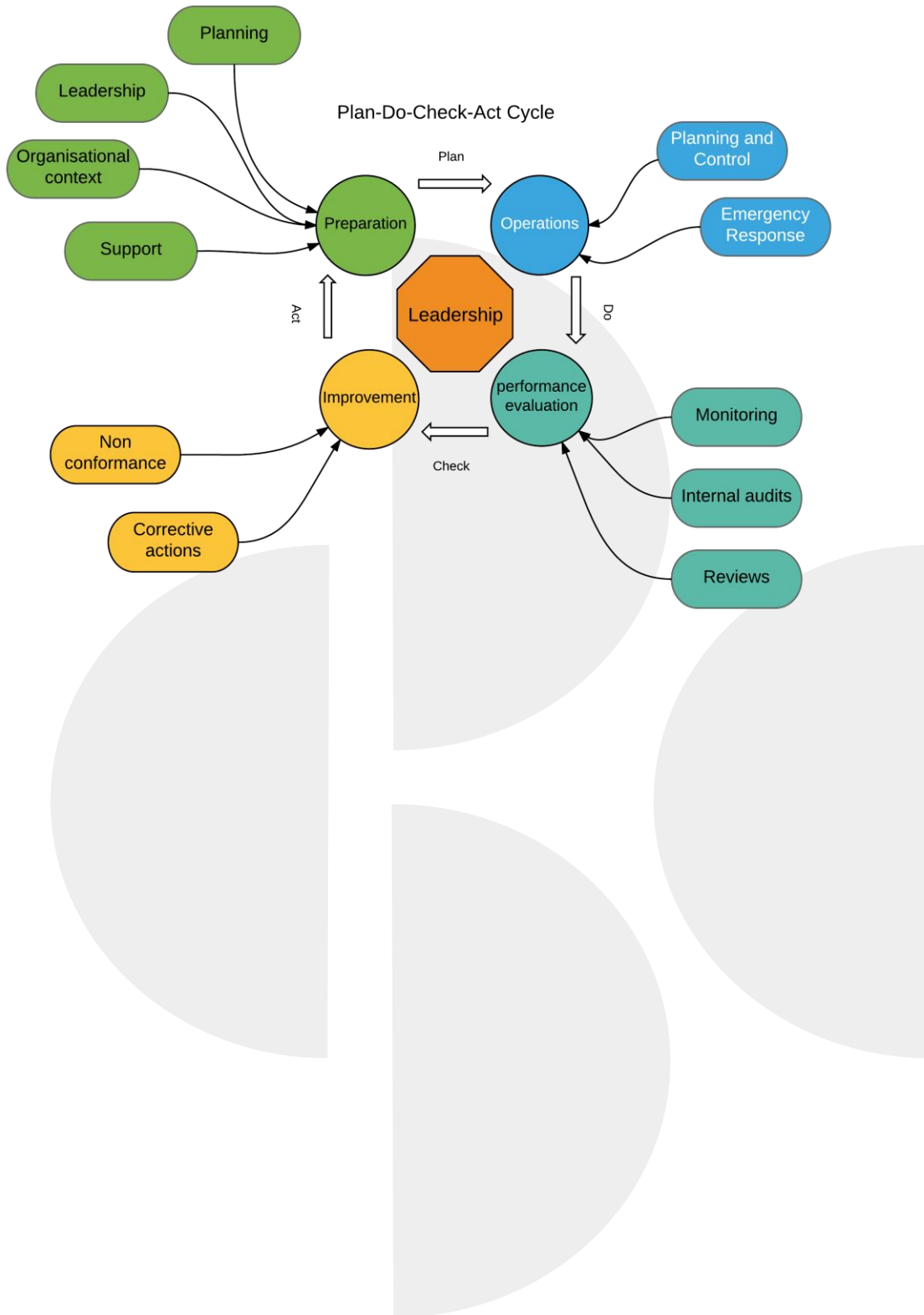
4.4 Environmental Management System

The EMS consists of three core components – Environmental Management System, policies and procedures:

- Policies
- Procedures
- Associated documents

CBC Facilities Maintenance Pty Ltd uses a risk and evidence-based thinking and a process-based (see Figure 1.) that incorporates the **Plan-Do-Check-Act** (PDCA) methodology as described below.

- **Plan:** Identify Environmental impacts of the business, establish plans, objectives, targets and processes necessary to deliver required outcomes for conforming to regulatory requirements and the organisation's policies;
- **Do:** Implement the processes required to mitigate the impacts as planned;
- **Check:** Monitor and measure process against the plans, objectives and targets against policies, objectives, requirements and planned activities, and report the results; and
- **Act:** Develop corrective and preventative actions to improve the processes so that the planned objectives and targets are met or continually improving towards that goal.



5 LEADERSHIP

5.1 Leadership and Commitment

General

Our Environmental Policy provides leadership, direction and guidance regarding our approach to Environmental management across our operations.

EMS Tactical Requirements

The EMS specifically encourages leadership at all levels and from employees associated with the business.

EMS Operational Requirements

Projects are to follow the requirements and expectations of the of the EMS. The principal documents for the operational level are the Project HSEQ Plans, including associated management plans, which define leadership approach to meet client requirements.

5.2 Environmental Management Policy

General

Our Environmental Management is governed by our Environmental Policy and is authorised by the Director and is to be regarded as set of fundamental principles, requirement and commitment to Environmental management.

The WHSEQ Manager is to recommend to the Director any additions or revisions to the Policy.

Environmental Management Policy is available for all stakeholders upon request.

EMS Tactical Requirements

As a requirement of the EMS, the WHSEQ Manager is to review the Policy to ensure it ongoing suitability to provide direction and guidance to the business and that it:

- 1 Is available to stakeholders upon request
- 2 Employees are to be familiar with the Policy
- 3 Is consistent with the defined scope of the EMS and the Standard
- 4 Is appropriate to the nature and scale of the Environmental management business and services provided

Annual Management Review requires the review and update of the Policy where necessary, and any actions where necessary to update the policy are also triggered and documented.

EMS Operational Requirements

Employees are required to be aware of and understand the commitments made in the Policy and are expected to know where to find the Policy within CBC's Business System for internal staff. All external staff i.e. site employees are given the policy as part of CBC's induction process.

5.3 Roles, Responsibilities and Authorities

General

The roles, responsibilities and authorities associated with the effectiveness of the EMS aligned to the Levels (Strategic, Tactical and Operational). Within the Levels there are assigned responsibilities to positions for the effective governance, implementation, organisation and delivery for the Level. The Level of awareness of the EMS for positions reflects the Level of involvement and engagement with the EMS.



EMS Tactical Requirements

The WHSEQ Manager is responsible for the ongoing maintenance of the EMS. CBC's EMS Organisational Chart represents the business structure and defines the roles and responsibilities within the EMS.

Awareness of the EMS is linked to roles and responsibilities. As a minimum expectation all management are familiar with this EMS, thereafter there is an expectation of employees to understand the EMS commensurate to their role within the EMS. The HSEQ Plans define roles and responsibilities from Strategic to Operational Levels.

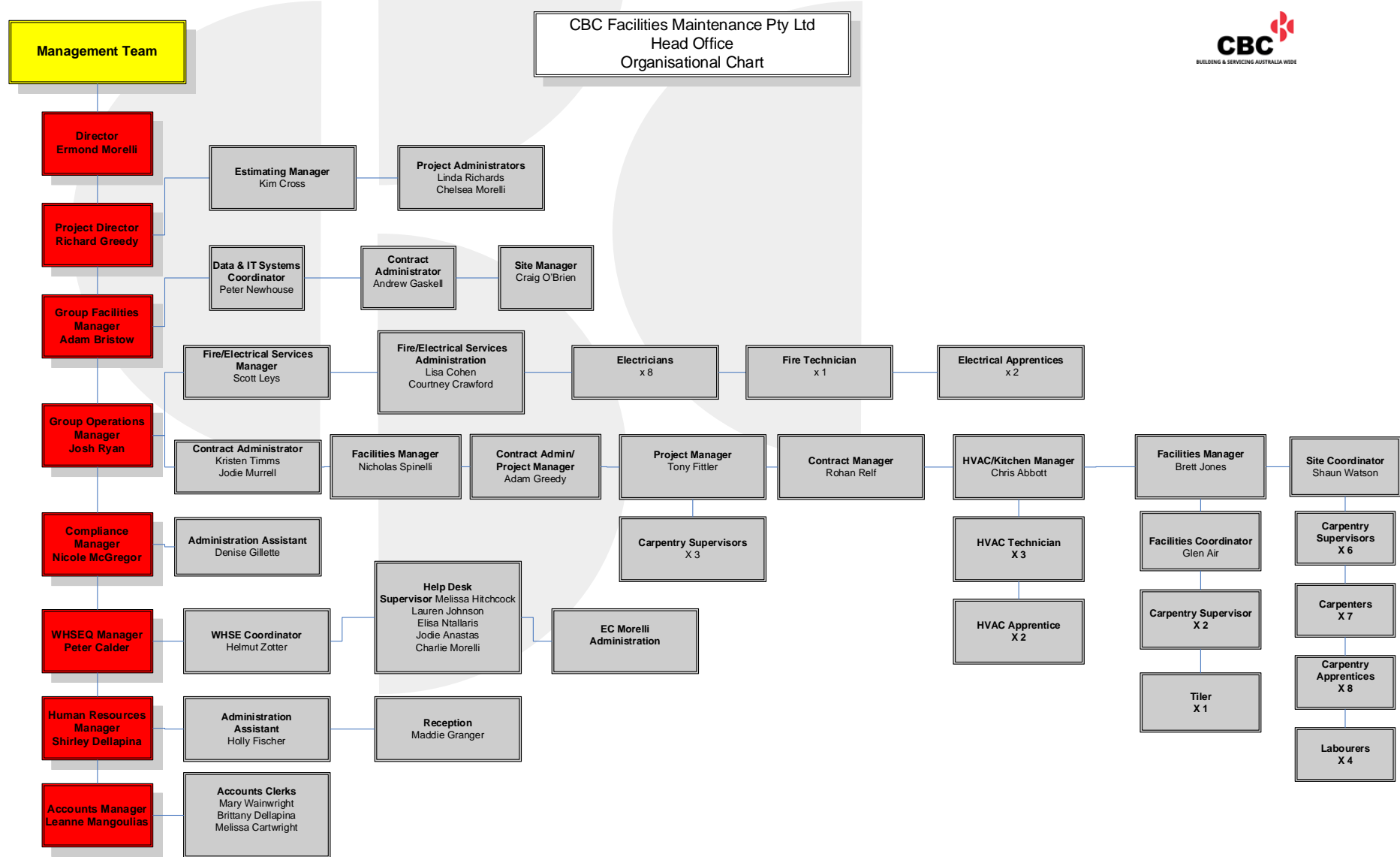
EMS Operational Requirements

The Project Director is to consider the suitability of an individual for any current or future roles by:

- Assessing the individual's experience and competence
- Providing support for the role through training and mentoring
- Considering other workload requirements and their variability, which could impact the individual's ability to deliver on Environmental management related objectives
- The ability to demonstrate an understanding of what the responsibilities mean in the context of their role.

For contractors and external service providers, their responsibilities and the competence required are to be documented in the scope or elsewhere in Contract documents.

CBC-PROC-238 Change Management is to be used where changes in roles and are being considered. Human Resources are to be briefed on any skills or competency that is required in order to facilitate recruitment efforts for any role (new or replacement).



Roles and Responsibilities

Role	Responsibility	Authority
Director	<ul style="list-style-type: none"> ■ Management CBC's Business ■ Define business vision goal and objectives including related to Environmental Management 	<ul style="list-style-type: none"> ■ Financial Delegate Authority ■ Approval of the Environmental Management Policy ■ Approval of Organisational Objectives
Project Director	<ul style="list-style-type: none"> ■ Management of the CBC Business ■ Provide adequate resourcing for the establishment of the EMS ■ Provide the vision and resourcing for the implementation of the EMS ■ Input the Awareness Vision and marketing of the EMS ■ Top Management Review of the EMS 	<ul style="list-style-type: none"> ■ Financial Delegate Authority ■ Define Roles, responsibilities and authorities within CBC ■ Approval of EMS Objectives (as part of Management Review)
Group Facilities Manager	<ul style="list-style-type: none"> ■ Provide direction and support on the development of the EMS ■ Development of Strategic Objectives and targets ■ Review of EMS Objectives ■ Top Management Review of the EMS ■ Ensure the implementation of the EMS Training Matrix employees ■ Ensure the suitability, adequacy and effectiveness of the EMS 	<ul style="list-style-type: none"> ■ Provide internal and external marketing of the EMS ■ Define Roles, responsibilities and authorities within Business System and Environmental Management Services business unit ■ Approval of Risk Register ■ Approval of EMS documentation with the exception of the Policy
Group Operations Manager	<ul style="list-style-type: none"> ■ Provide support for the implementation of the EMS including delivery of Project HSEQ Plans ■ Establishing and updating Tactical documentation HSEQ Plan ■ Ensure the suitability, adequacy and effectiveness of the HSEQ Plan 	<ul style="list-style-type: none"> ■ Allocate human resources to manage projects ■ Approval of Risk Register (projects)
Group WHSEQ Manager	<ul style="list-style-type: none"> ■ Oversee the establishment and maintenance the EMS document. 	<ul style="list-style-type: none"> ■ Close out/ escalate nonconformity in relation to EMS.

	<ul style="list-style-type: none"> ■ Facilitate and provide inputs including reporting on the performance of the EMS to top management ■ Review, verify, assign, report, follow up nonconformities in relation to EMS. ■ Ensure compliance with international standard ■ Controlling and monitoring of Risk Register ■ Establishing & Updating the EMS,HSEQ Plans as required 	<ul style="list-style-type: none"> ■ Release the EMS Documentation to be inspected by third party ■ Internal Audit of the EMS
Contract Administrator	<ul style="list-style-type: none"> ■ Develop and maintain information systems planning. ■ Development of optimal work program and Risk Management ■ Establishment and maintenance of EMS documents for Environmental management planning 	<ul style="list-style-type: none"> ■ Update CBC CMMS when required ■ Contract set up in CMMS
Facilities Manager/Project Managers	<ul style="list-style-type: none"> ■ Provide inputs into the Top Management Review of the EMS ■ Ensure the development of project HSEQ Plans ■ Implement the EMS on the Project ■ Ensure the implementation of the EMS Training Matrix for Project employees ■ Development and updating of the project HSEQ Plans ■ reporting on the performance of the Environmental management to Top Management ■ Maintaining project EMS risk register ■ Project level risk register 	<ul style="list-style-type: none"> ■ Approval of Project specific HSEQ Plans ■ Determine Resource and competencies needed for implementation of EMS and delivery of the Project ■ Communications and meetings with the regulators, the general public and other stakeholders ■ Evaluation and approve subcontractors
Facilities Coordinator	<ul style="list-style-type: none"> ■ Ensure training and induction into the EMS ■ Programming maintenance and reactive works ■ Supervising works for maintenance ■ Environmental requirements for maintenance works 	<ul style="list-style-type: none"> ■ Internal audit within project procedures ■ Close out/escalation of project nonconformities ■ Scheduling of Maintenance Program
Employees	<ul style="list-style-type: none"> ■ Execution of works to complete maintenance tasks and reactive works 	<ul style="list-style-type: none"> ■ Undertake minor maintenance activities

6 PLANNING

6.1 Actions to address Aspects and Impacts for the EMS

6.1.1 General

The aspects and impacts Register is used to identify the all activities, which have an impact on CBC's operations, that potentially have an impact upon Environmental management, and the EMS. The environmental aspects and associated actual and potential environmental impacts have been identified for normal operations, uncommon events, and incidents.

The environmental impacts have been assessed for significance using:

- The frequency or probability of occurrence of the impact; and
- The severity of the impact;

The environmental aspects associated with identified significant environmental impacts are managed in this EMS.

The register of Environmental Aspects and impacts is reviewed annually particularly before annual management review cycles, and when any changes are planned for operational processes, materials, legislation changes, or in response to change management triggers etc. The results of the reviews are used to identify the areas of operation in which objectives and targets for improvement are most appropriate and to determine where environmental control procedures are required.

The risk register for the Project within the scope of the EMS are maintained by Facilities Managers, supported by the Group Facilities Manager. It is reviewed as required.

EMS Tactical Requirements

CBC-GU-004 Risk and Opportunity Management Framework are to be followed to determine the risks and opportunities that need to be addressed to:

- give assurance that the EMS can achieve its intended objectives;
- prevent or reduce undesired effects;
- Achieve continual improvement.

EMS Operational Requirements

Project risks are identified prior to commencement using the risk assessment form. These risks are assessed and managed specifically for each project and maintained within Project Risk Register.

Project Risks are monitored and reviewed by Facilities manager. It is conducted in order to:

- Identify actions to address project risks and opportunities, taking into account how these risks and opportunities can change with time;
- Integrate and implement the actions into EMS procedures
- Evaluate the effectiveness of the actions.
- Ensure changes to the risks over the time are identified

Environmental individual risks are managed through processes within our HSEQ Plans. Site conditions are collected on a regular basis and entered into CBC's CMMS which will contribute to programming of Environmental maintenance.

6.1.2 Environmental Aspects

CBC will endeavour to take into consideration the following environmental aspects and impacts for activity, products and or services:

- Air emissions;
- Effluent discharge
- Waste management
- Land contamination

- Use of resources (water, fuel and natural resources).

The above aspects relate to that CBC can control. There are other aspects over which the CBC may have “control” or “influence”. These can include:

- Performance — of contractors (on site) and suppliers of goods and materials
- land use — improve biodiversity and wildlife habitats on site.

Those identified aspects and impacts, will be captured on the CBC aspects and impacts register

6.1.3 Compliance Obligations

This section defines, document and communicates the responsibility, authority and accountability for all legal and regulatory compliance obligations. This applies to all activities including legislative, contractual, licences and other forms of authorisation or standard.

CBC is committed to conducting its business activities lawfully and in a manner, that is consistent with its compliance obligations. These obligations will be achieved by:

- Identifying a clear compliance framework within which CBC operates;
- Promoting a consistent and comprehensive approach to compliance;
- Developing and maintaining practices that assist and monitor compliance activities;
- Creating a culture of compliance where every person within the organisation accepts personal responsibility for compliance.

The below compliance obligations describe how CBC identifies applicable legal and other requirements.

1. The WHSEQ Manager is responsible for determining the applicable environmental laws and regulations that arise from CBC business practices and, evaluating their potential impact on business operations;
2. As necessary, the WHSEQ Manager should utilise off-site resources such as Environmental consultants, legal representatives and regulatory representatives;
3. The WHSEQ Manager will compile and maintains updated copies of all applicable environmental laws and regulations, licences and permits, codes of practice or other material necessary to meet legal obligations;
4. The WHSEQ Manager, working with the Projects/Facilities/Contract Managers, correlates these regulations to the business activities and environmental aspects associated with them using the Legal Requirements Register;
5. The requirements of these regulatory controls will be communicated (and the methods for complying with them) to all employees, contractors and other effected parties as necessary.
6. Monitoring and Evaluation of Legal and other requirements

6.1.4 Planning Action

During the planning phase, CBC Management Team considers the management issues described in the Introduction to this document and determines:

- The risks and mitigation strategies that are to be addresses that may (if they eventuate) have a negative impact on the operation; and
- The opportunities that the company can leverage to ensure growth and sustainability.

The processes and associated documentation developed will provide assurance that the processes that CBC Facilities Maintenance Pty Ltd use will convert the inputs into the expected outputs against our customer’s requirements. By improving our EMS through good planning, we are able to:

- Enhance the desired effects of the opportunities that may occur;
- Prevent, mitigate and / or reduce the effects of undesired outcomes; and
- Achieve the improvements that are planned for.

The actions to mitigate risks and develop opportunities follow the Hierarchy of Controls (see Figure 2.) and through the monitoring and measurement phase an evaluation of the controls is required. Each control developed, and implement is proportionate to the impact that the risk or opportunity presents on the conformity of the products and services created by CBC.

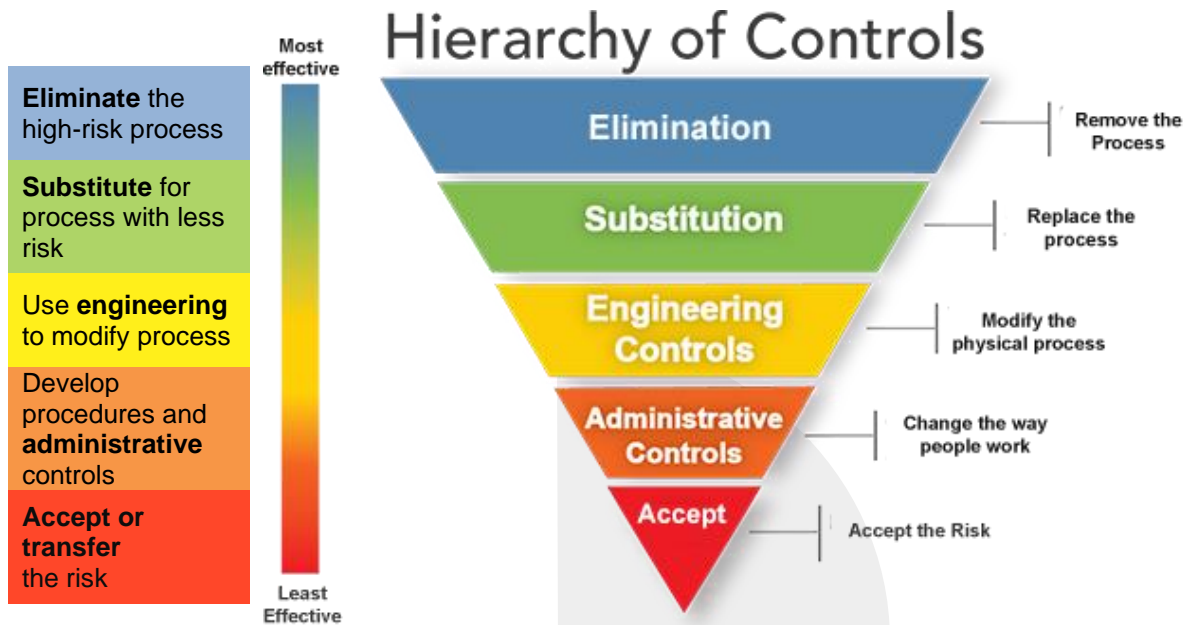


Figure 2. Hierarchy of Controls

6.2 EM OBJECTIVES AND TARGETS PLANNING

6.2.1 EM Objectives

General

The Policy and objectives in the business are triggered by the desire to support Clients in achieving their defined outcomes efficiently whilst maximising the revenue and relationship potentials for CBC. Clients are likely to have a top-down set of policy objectives driven by stakeholders that is to be included in objective mapping.

The Objectives and Targets Register has a series of objectives for Environmental Management. CBC has implemented procedures that enable monitoring and evaluation of progress towards achieving these objectives.

In considering the need for new or refining current objectives (or determining when objectives have been met) considering the requirements of relevant stakeholders, financial, technical, legal, regulatory and requirements in Environmental management planning procedures.

The procedures implemented within the EMS are considered for the monitoring, measuring, analysing and evaluating needed to drive and support, development, decision making processes and improvement actions.

EMS Tactical Requirements

The Context of the Organisation register is used to develop meaningful and progressive objectives for the business. The drilling down through the business of objectives enables programming and the development of key monitoring and measurement objectives. The Management Team is involved in the development of objectives for the business. The process relies on both a top down and bottom up feedback to develop and deliver on the objectives. In developing objectives our main purposes of the EMS is considered and include but are not limited to:

- Management of the integrity of the Environment by application of a cost-effective long-term maintenance strategy supported by an Environmental condition and performance
- Development and implementation of a management system sufficient to demonstrate that the Environment is being managed within the defined performance criteria.
- Identification, programming, prioritisation and delivery of works to achieve the specified performance criteria

- Maintaining, rehabilitation and renewal of the Environmental requirements
- Management of risks (real or potential) of the products and/or service, including the potential impacts from failure
- The criticality of Environmental control to successful outcomes or Level of Service requirements;
- Environmental level of service
- Meeting contractual requirements

EMS Operational Requirements

CBC has recognised the key challenges ahead as:

- Improving Environmental control
- Moving towards sustainability
- Understanding our Clients better

The objectives of the EMS are to assist the client in meeting these challenges through the management and maintenance of Environmental control to assure it is sustained for future generations.

In addition to the routine maintenance and safe and efficient operation of the product and/or service, the HSEQ Plan includes the planning and execution of works for the rehabilitation and renewal of the product and service.

The objectives at the Operational Level need to be consistent with the expectations of the Policy and are to be:

- Consistent and aligned with the organisational objectives
- Consistent with the Policy
- Established and updated using Environmental management decision-making criteria
- Established and updated as part of HSEQ Plan expectations
- Measurable (if practicable)
- Taken into account applicable requirements
- Monitored
- Communicated to relevant stakeholders
- Reviewed and updated as required

The Project Manager/ Facilities Manager is to document and retain information on the Environmental management objectives relevant to the respective project.

6.2.2 Planning to Achieve Environmental Management Objectives

General

The delivery of the EMS objectives is achieved through Project HSEQ Plans and enable integrated rationalised planning for achieving the objectives with other planning activities, including financial, human resources and other support functions.

The Project HSEQ Plans are aligned through the EMS, the Policy.

The list of documents that support HSEQ Plans development are available in CBC's Business System

HSEQ Plans describe the strategies to perform the following key functions:

- The Environmental management planning process and cycles
- Processes
- Performance Measures assessment
- Environmental control processes for Environmental management planning

A key element of the Environmental management planning process is Internal Audits. The Internal Audit approach enables monitoring, evaluation and refinement the HSEQ Plans, as well as the EMS.

EMS Tactical Requirements

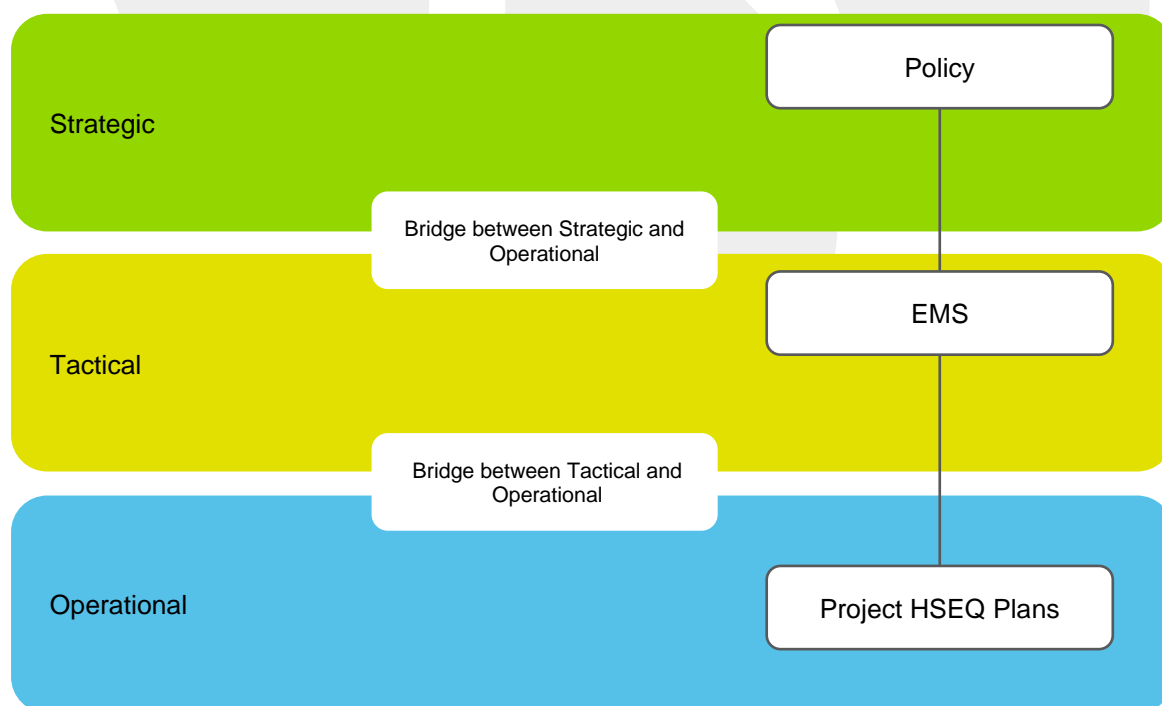
The Client Contract requirements is to be followed to develop the HSEQ Plans and its associated management plans. The SECURED framework:

S.E.C.U.R.E.D = Structure + Evaluation + Control +Utilisation + Review + Efficiency + Development

- Forms the basis for decision making and prioritising of the activities and resources to achieve Environmental management objectives to be delivered in the Project HSEQ Plan;
- Specifies the processes and methods to be employed in managing its Environment
- Determines and describes what is to be done
- Specifies what resources are required
- Identifies who is responsible
- Establishes when it's completed
- Establishes how the results are evaluated
- Identifies the lifespan for the Project HSEQ Plans
- Understand and management of risks and opportunities associated with managing the Environment, taking into account how these risks and opportunities can change with time

EMS Operational Requirements

Project HSEQ Plans are required for projects that falls within the Scope defined in the EMS. The Project HSEQ Plan is to be used as the principle integral approach for Environmental management of the project. Using the SECURED process enables the Project HSEQ Plans to be representative and reflective of site conditions and circumstances.



The Project Manager/ Facilities Manager on annual basis reviews Project HSEQ Plans with the intention of reviewing for alignment with the EMS Policy, and the EMS This is followed by internal audit which will be reported to the management review meeting for their appraisal.



7 SUPPORT

7.1 Resources

General

The Management Team is committed to the Policy and EMS and provides sufficient resourcing to achieve the EMS objectives to meet expectations of Clients and the legislation that governs activities.

EMS Tactical Requirements

The WHSEQ Manager is responsible for the overall maintenance of the EMS. During the annual Management Review Meeting resourcing needs for the establishment, implementation, maintenance and continual improvement are discussed, reviewed, refined where required and decisions made.

CBC is committed to providing the resources required for meeting the objectives and for implementing the activities specified in Project HSEQ Plans.

EMS Operational Requirements

The Group Facilities Manager working with the Facilities Managers discusses and evaluates the resource needs for the EMS and the operations of the Project. Outsourcing solutions are to be engaged in accordance with EMS Procedures.

The resources required are in part predetermined via contractual requirements and the subsequent level of services and delivery program to be provided within Project HSEQ Plans.

Resource requirements are discussed as part of the Annual Management Review to identify and determine options for resourcing the activities and can require prioritisation and program planning. The process is to consider:

- Internal and external resources
- Human resources
- Procurement and outsourcing options (e.g. lease, hire, purchase or otherwise acquire)
- Tools, plant, facilities or equipment that is required for the delivery and control of Environmental management

7.2 Competence

General

The highly technical and specialised nature of the business requires employees working at CBC to be trained and competent to conduct the tasks and duties associated with respective roles. CBC places great emphasis on training and developing employees to facilitate the right competencies are in place to enable effective operations.

EMS Tactical Requirements

CBC has developed procedures and management approaches that enable the business to:

- Determine the necessary competence of employees and contractors who can affect EMS performance
- Ensure employees are competent on the basis of education, training, or experience
- Take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken
- Retain required documented information as evidence of competence
- Periodically review current and future competency needs and requirements

CBC believes companies with a skilled and flexible workforce enjoy a significant competitive advantage and is committed to the training and development of employees. Training and up-skilling provide additional benefits to employees by increasing their variety of work, job satisfaction and enhances career prospects. CBC proactively identifies opportunities for:

- Training on an individual basis (on-line, face to face)

- Group training (i.e. team building for employees)
- Pre-employment training (i.e. to assist in addressing EMS skill shortages)
- Skill training including trade and non-trade

EMS Operational Requirements

The Group Facilities Manager work with Human Resources to develop technical, managerial and EMS competencies and grow the experience base within the business where possible and practicable. Employees having a role within EMS are required to have competencies which are determined for roles. Detail of required skills per role is in CBC's CMMS. These skills include but not limited to:

- Environmental Management Awareness
- Environmental Management course (professional)
- Conflict Resolution
- Microsoft Excel

Project training needs are identified from an understanding and evaluation of

- Risks commensurate to roles
- Job description competency requirement
- Business needs
- Contractual requirements

Compliance training is provided to employees to meet legislative requirements. CBC employees are strongly encouraged to build their skills and CBC supports these employees to obtain qualifications to undertake long-term careers in the Facilities Maintenance industry. The competency framework encourages and provides clear pathways for employees to broaden their capability and take on supervisory and management roles in the company.

Part of ensuring employees are trained, they are to receive the CBC employee induction prior to starting work.

7.3 Awareness

General

Awareness of the Policy, EMS and an understanding for employees of how they fit in is important to the EMS functioning. Having an understanding for the level of overall awareness of the EMS creates efficiencies in the allocation of resources, training, and expenditure. The expectations of the EMS rely upon established Human Resources systems to ensure effective training, competency and awareness for all employees, commensurate to role and risks associated with the role.

Awareness Level	Definition
Level 1 - Operational	<p>Employees are required to understand the Policy, the EMS and their role and responsibilities within EMS.</p> <p>Employees responsible for contract administration, management of the Project HSEQ Plans and reporting on EMS performance at the Operational Level</p>
Level 2 - Tactical	Responsible for the tactical direction, governance, maintenance implementation and performance of the EMS. The WHSEQ Manager is the key point of contact for the EMS, supported by The Group Facilities Manager
Level 3 - Strategic	Responsible for guiding the business direction, governance, ownership and development of corporate objectives for the EMS.
Level 4	Knowledge of the EMS only. No responsibilities directly to the EMS other than passing information back i.e. work statements.

EMS Tactical Requirements

Employees and contractors that can have an impact on the achievement of the EMS objectives are to be aware of:

- The Policy
- Their contribution to the effectiveness of the EMS, including the benefits of improved Environmental management performance
- Their work activities, the associated risks and opportunities and how they relate to each other
- The implications of not conforming to the EMS requirements

Measures to gauge and raise awareness are developed and implemented, and can take the form of:

- Tool box talks
- Work instructions
- Guidelines
- On line training
- Awareness training

EMS Operational Requirements

Employees as a minimum are expected to:

- Be fully aware of the requirements of the Policy and EMS
- Be fully aware of the requirements of permits and authorisations of project operations
- Understand the criticality and risks associated with their role and an understanding the potential impacts on operations in the absence of their role

7.4 Communication

7.4.1 General

General

CBC recognises the importance of effective communications (both internal and external) towards achieve the EMS objectives.

In achieving effective communication, the need for distinct internal and external communications procedural control for Environmental management and the EMS has been identified. Effective communication comprises clarity around:

- What is communicated
- When to communicate
- With whom it is communicated
- What is the most effective means to communicate

The Management Team and leaders at all levels are responsible for communicating the importance of the EMS and its objectives to employees, customers, suppliers, contractors and other stakeholders. Communication is to be two-way, with the Management Team being open to receiving information aimed at improving the EMS from all levels.

Communication channels for contract stakeholders are listed in HSEQ Plans for the project.

EMS Tactical Requirements

Communications are classified as either internal or external and can either be prepared or received. Communications can also be informal or formal.

The Facilities Manager is to be consulted upon receipt of external communications.

Full details of the obligations, methods used for communication, recording, tracking and the responsibilities are specified in the HSEQ Plans. Contractual Performance Criteria are stated in the Contract.

A Complaints investigation is conducted when any received complaint or objection regarding the performance of the Environment or EMS to be objectively investigated and rectified. This process is to be followed in the event of a complaint.

EMS Operational Requirements

The Management Team are required to follow the EMS and HSEQ Plans.

Part of the regular project toolbox meetings includes Environmental performance and management issues affecting operations and delivery, proposals for improvements, and the status of the EMS is discussed. The meetings are to be documented and kept on file.

Employees with responsibilities within the EMS receive or are directed to a copy of parts of the EMS to ensure that they are aware of their responsibilities.

Project meetings provide platforms to communicate Environmental management information where required and the findings of these meetings are communicated to the Management Team.

Communications and meetings with the regulators, the general public and other stakeholders are dealt with by the Group Facilities Manager in consultation where necessary.

7.4.2 Internal Communication

Relevant information on CBC's EMS, environmental aspects and environmental performance shall be communicated within CBC by:

- Meeting Minutes
- Toolbox Talks
- Emails
- Work Instructions
- Notice Board Information
- Safety Alerts

- On Line Training

7.4.3 External Communication

Relevant information on CBC's EMS, and environmental performance shall be communicated externally by CBC when requested at Client Meetings. All external communication received by CBC will be dealt with by The Facilities Manager in a timely manner and all received external communication will be maintained in the relevant project folder.

- The capability to maintain the Environment and timeliness of the information.

7.5 Documented Information

7.5.1 General

CBC has identified through experience, consultation with stakeholders, and by understanding our obligations (contractual, client, stakeholder, legal, Corporate and those for Standards) determined the documented information required to facilitate effectiveness of its EMS and Environmental management activity.

EMS Tactical Requirements

In determining documented information requirements data and information flows across Environmental Management has been considered. As part of this process, documentation and retention requirements (business, legal, contractual, etc.) have been determined. Controls are in place for the management of documented information. All information is regarded as confidential unless otherwise stated.

EMS Operational Requirements

The CBC-PROC-037 control of document and records is to be followed regarding documented information. The project is responsible for identifying and keeping operational records and data on file. The retention period is identified by the project in circumstances of project specific data. The project is responsible for maintaining its own Project HSEQ Plan and any other information important to the EMS and/or necessary for the effectiveness of the EMS.

7.5.2 Creating and Updating

General

When creating and updating documented information CBC have effective controls in place to facilitate currency, accuracy and relevancy to support employees with EMS roles and responsibilities are using the approved, accurate and most up to date information.

EMS Tactical Requirements

Documents are systematically controlled for authorisation, content, issue, review, availability and withdrawal. Full details of the method used for creating and updating and the responsibilities are contained in CBC-PROC-037 Control of Documents and Records Procedure.

It is standard within the EMS for documents to be assessed and approved for adequacy prior to issue and documents of external origin, such as licenses, are identified and their distribution is controlled.

Following table outlines responsibilities for creating and approval of EMS documentation:

Type of documents	Checked by	Approved by
EMS Policy	WHSEQ Manager	Director
EMS Objectives	WHSEQ Manager	Director
EMS	WHSEQ Manager	Director
Project HSEQ Plans	Facilities Manager	Director

Amendments to the EMS

All amendments to the EMS are authorised by the WHSEQ Manager. They are made as required to reflect the current EMS. The amended sections are identified by an upgraded date and issue number. Documents are issued in accordance with CBC-PROC-037 Control of Documents and Records Procedure.

The Project is required to follow the CBC-PROC-037 Control of Documents and records Procedure. When creating and updating documented information the project is required to use required:

- Identification and description (e.g. a title, date, author, or reference number)
- Format (e.g. language, software version, graphics) and media (e.g. paper, electronic)
- Review and approval for suitability and adequacy

7.5.3 Controlled Documented Information

General

The EMS documentation contains all documents related to the EMS. It is controlled by the WHSEQ Manager and is reviewed annually for the accuracy and suitability of its current content. Documented procedures are in accordance with CBC-PROC-037 Control of Documents and Records Procedure to facilitate the effective documentation of the operation and control of processes that relate to the Environmental management and the risks and opportunities that they generate. Hard copies are held by the:

- Facilities/Project Manager
- Other required CBC Management

Where required other managers have electronic access to the EMS via CBC's Business System. Employees have access to a read only version of the latest Policy.

The documentation within the EMS is confidential but can be inspected by necessary third-party organisations and referred to by contractors at the discretion of WHSEQ Manager.

EMS Tactical Requirements

All manuals, procedures, guides and related documents which detail Environmental management performance or legislative compliance forms part of the EMS and are formally controlled. The EMS is to be distributed in two categories, controlled and uncontrolled. Both are identical at the time of issue.

Origination and maintenance of the EMS is the responsibility of the WHSEQ Manager. Distribution is specified by the WHSEQ Manager and effected through CBC-PROC-037 Control of Documents and Records Procedure.

EMS Operational Requirements

CBC-PROC-037 Control of Documents and records Procedure is to be followed in regard to the Control of Documented Information. Documented information is required to be:

- It is available and suitable for use, where and when it is needed
- The currency and comprehension are up to date
- It is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

Documented information from external sources is identified, as required, and controlled

8 OPERATION

8.1 Operational Planning and Control

General

EMS factors in several checks and balances to facilitate operational planning and control, planned for and maintained operational control via measures such as:

- The Environment of our workforce knowing what to do and when to do it;
- Sound design principles that enhance control
- The program for surveillance and maintenance (reactive and routine)
- The Business Improvement and internal audit processes and criteria for checking and scrutinising performance
- Development and documentation of tried and tested guidelines, procedures and plans
- Task specific training and accomplishment reinforcement
- Understanding the risks, criticality and resilience of the Environment to operations
- Sign off procedures for key tasks
- A Zero Harm system that helps keep employees and contractors safe

EMS Tactical Requirements

Operational control is a consequence of planning and implementation, CBC is committed to maintain operational control and to the process of Continual Improvement.

The HSEQ Plans provide insight into the risks on projects. The understanding of risk enables preparation of documented work instructions, procedures or plans to manage and mitigate risks, supplemented by a combination of physical, human and systematic measures, such as:

- Tools and equipment
- Competent, trained and experienced employees and contractors
- Aspects and Impacts Register
- Documented systems (EMS and HSEQ Plans)

CBC is able to plan, implement and control the processes needed to meet requirements, and to implement the actions by:

- Establishing criteria for the required processes
- Implementing the control of the processes in accordance with the criteria
- Keeping documented information to the extent necessary to have confidence and evidence that the processes have been carried out as planned
- Treating and monitoring risks

The Annual Review examines operational performance over the course of the year and looks at the levels and standards attained. Any upgrades or improvements needed are discussed, planned and committed to following Management Review.

EMS Operational Requirements

Project operations are required to achieve project performance measures by understanding and developing the right balance of:

- Roles and responsibilities;
- Work instructions and procedures;
- Reliance on HSEQ Plans
- Resource allocation;
- Monitoring, reporting and performance evaluation

- Competency development.

The Project is required, as a minimum, to provide operational performance data for the basis of discussion during the annual review.

Outsourcing

Outsourcing is a common method for CBC when it prefers the activities to be performed by an external or internal service provider. When these activities influence the achievement of the EMS objectives, these are to be part of the EMS, and are to be documented.

A risk assessment is performed prior to outsourcing activities that can influence or impact upon the business achieving EMS objectives, and where required adequate controls are initiated.

The Management Team understands the importance of managing the procurement and supply process by using planned elapsed durations and working backwards to the completion of the requirements to allow for the timely management of each milestone and expediting, as required.

The following core procurement principles are maintained throughout the duration of the project

- Procurement activities are only conducted by delegated and authorised employees
- An open and honest procurement environment for all stakeholders is maintained
- Risks associated with sourcing options are documented and considered
- Suppliers and Contractors are pre-qualified prior to awarding any contracts

EMS Tactical Requirements

The CBC-PROC-110 Purchasing Procedure is to be followed regarding potential outsourcing. In the event of an outsourcing requirement, the EMS requires documentation of the services or tasks needed and the controls to be initiated and integrated into the EMS. In particular regard is to be given to, but not restricted to:

- The processes and activities that are to be outsourced (including the scope and boundaries of the outsourced processes and activities and their interfaces with CBC processes and activities);
- The responsibilities and authorities for managing the outsourced processes and activities;
- The processes and scope for the sharing of knowledge and information between CBC and the Contractor.

CBC consider the ownership and protection of intellectual property and corporate knowledge (including that generated during the outsourcing) when outsourcing Environmental management activities.

EMS Operational Requirements

CBC-PROC-124 Contractor Management is to be followed prior to any outsourcing activity commences. As part of the control process there is a requirement to demonstrate and document that EMS expectations are adhered to the Facilities Manager is to check that:

- The outsourced resources meet the requirements
- The performance of the outsourced activities is monitored
- CBC knowledge share through
- Contract with the subcontractor with the requirements/ specifications
- Onsite make up of work zones
- Scope drawn up and sent to the subcontractor
- Receiving information of completed works

- Purchase Orders/Subcontractor statements (stat decs)
- Operational meetings with subcontractors

8.2 Emergency Preparedness and response

CBC will manage and coordinate potential emergency incidents and responses at all sites included within the scope of this EMS in order to minimise any adverse environmental impacts.

Potential emergency situations and incidents, and the associated environmental impacts, are identified as part of the Register of Environmental Aspects and Impacts.

For each potential emergency or incident an appropriate response plan will be developed, which includes measures for the prevention and mitigation of environmental impacts arising from emergency or incident, or from response.

Emergency and incident response plans are regularly tested and revised as necessary.

A Corrective action report form will be completed immediately following an incident.

9 PERFORMAMNCE EVALUATION

9.1 Monitoring, Measurement, Analysis and Evaluation

9.1.1 General

CBC monitors and assesses the effectiveness of the EMS, Policy and performance against objectives specified within the EMS. Performance is monitored against contract requirements, authorisations and legislative requirements. Evaluation and reporting is based on:

- The performance of the Environment;
- The overall Environmental management performance, including financial and non-financial performance;
- The effectiveness and ongoing suitability of the EMS.

EMS Tactical Requirements

The EMS requires monitoring to be carried out in accordance with the HSEQ Plans to:

- Record data on the Environment and risks.
- Confirm compliance with operational and contractual requirements.
- Identify monitoring and measurement requirements of stakeholders
- Evaluate and report on the effectiveness for managing Environment risks and opportunities.
- Confirm that the EMS is being adhered to.

As part of the monitoring and measurement program information to monitor performance and operational controls are assessed by the:

- Facilities/Project Manager
- Group Facilities Manager
- Facilities Coordinator

Monitoring of significant risks and operational procedures are carried out according to the schedule of performance indicators, methods and frequencies set out in the HSEQ Plans.

The Facilities Manager, in conjunction with the Facilities Coordinator are responsible for ensuring that the EMS is correctly implemented within the project and that monitoring results are retained in the EMS for defined periods in accordance the HSEQ Plans.

EMS Operational Requirements

The Project has a set of plans to determine:

- What needs to be monitored and measured;
- The methods for monitoring, measurement, analysis and evaluation, to achieve data and results are valid;
- When the monitoring and measuring is to be performed;
- When the results from monitoring and measurement is to be analysed and evaluated.
- What, where and when documented data and information is to be retained as appropriate records of the evaluation process

Monitoring of progress against the requirements of the management program is to be carried out at regular Team meetings.

9.1.2 Evaluation of Compliance

Compliance checks at a site level are integrated with the annual internal audit program undertaken by the WHSEQ Manager and any non-compliances recorded on the internal audit report. In addition, a formal compliance check against the Legal and Other Requirements Register will be at least annually.

The results of all audits and performance monitoring undertaken will be brought to the management review and forms part of the WHSEQ Manager responsibility in providing to The Management Team feedback on the performance of our environmental management system.

9.2 Internal Audit

9.2.1 General

The Project HSEQ Plans is the responsibility of the Project/ Facilities Manager and WHSEQ Manager to devise and plan the audit program and to ensure the retention of associated records and findings from audits. The WHSEQ Manager is responsible for preparing an annual audit program and for ensuring that the audits are carried out to schedule by qualified employees. The audit program ensures that all aspects of the EMS are audited, and that weight is given to the frequency of auditing operations and activities that create significant environmental impacts.

The selection of auditors and the conduct of audits are to be objective and impartial. The WHSEQ Manager and The Group Facilities Managers are responsible for the evaluation of auditor experience and competencies. The WHSEQ Manager is responsible for the scheduling of verification audits that are performed by external auditors.

Where internal auditors are used the audits, they are to be carried out as specified in the CBC-PROC-046 Internal Audits Procedure. There are two types of internal audits associated with the EMS:

- System audit against management procedure and/or system requirements Continual improvement;
- Process or product audit Compliance.

A verification audit can be performed by an independent third-party auditor in order to:

- Validate the EMS functioning and performance
- Ascertain compliance, and
- Demonstrate compliance with system requirements for any legal permit expectations.

Where external auditors are used, the WHSEQ Manager is to ensure that the procedure used by the external auditors is compatible with the EMS.

General

The drivers for change and the need to manage that change can come from many different sources and can include but are not limited to:

- Advances in technology
- Variations to Contracts
- Client requirements
- Changes in legislation
- Audit findings
- Changes in risk threshold/status
- Potential opportunity developments

Changes within the business can be a planned progression or a reactive progression and in either case, CBC has measures in place that can respond in order to successfully achieve objectives.

EMS Tactical Requirements

The CBC-PROC-021 Change Management Procedure is to be followed in planning for and responding to the consequences of change. It is a requirement of the EMS that the risks associated with any planned change, (permanent or temporary) that can influence or impact on achieving the EMS objectives, assessed before the changes are implemented. The identified risks are managed according to the requirements of the EMS.

During planned changes, the WHSEQ Manager in conjunction with necessary Contract/Project team members monitor for intended and unintended consequences of the changes, taking action to mitigate any adverse effects, as necessary.

Initiated change is evaluated to assess the risk associated with the change using the risk matrix. This is managed through the CBC-PROC-021 Change Management Procedure

EMS Operational Requirements

The CBC-PROC-021 Change Management Procedure is to be followed in all matters regarding the management of change.

The Project is required to consider and document response to any changes to, but is not limited to, the following:

- Structures, roles or responsibilities
- The Policy, EMS objectives or plans
- Process(es) or procedure(s) for Environmental management activities
- New Environment awareness, EMS or technology (including obsolescence)
- Factors external to the organisation (including new legal and regulatory requirements)
- Contractual or supply chain constraints
- Demands for products and services, contractors or suppliers
- Demands on resources, including competing demands

Initiated change is evaluated to assess the risk associated with the change using the risk matrix. This is managed through the CBC-PROC-021 Change Management Procedure

9.2.2 Internal Audit Program

EMS Tactical Requirements

It is a requirement of the EMS that a program of internal audits at planned intervals is resourced and implemented annually, in accordance with the CBC-PROC-046 Internal Audits Procedure to ensure performance meets the needs of the business and clients and the EMS conforms to its requirements of the Standard.

EMS Operational Requirements

At the operational level the WHSEQ Manager and The Group Facilities Manager is to:

- Define the scope of the internal audit
- Take into consideration the importance and criticality of processes, the Environment on the project and the results of previous audits;
- Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
- Ensure that the results of the audits, including nonconformities, observations or opportunities for improvement are reported to management; and
- Document and retain the audit process and information as evidence of the audit

9.3 Management Review

General

A review of the EMS is conducted annually in accordance with the Management Review Agenda. The Group Facilities Manager is to evaluate the Context of the Organisation register and present the findings at the Management Review Meeting. If there are no changes then the Group Facilities Manager reports this at the Management Review meeting. Any changes are to be discussed and the actions identified and mandated (the actions could be developed as part of a Project for Change or a Non-Conformance).

The WHSEQ Manager is responsible for the planning of the EMS Management Review. Ideally the review takes place at the end of the contractual year to enable objectives to be set for the next year. The meeting ensures that CBC's performance over the preceding period is appraised, that the Policy is reviewed and objectives, targets and the management program are specified for the beginning of the following year.

EMS Tactical Requirements

The attendees for the meeting are:

- Director
- Project Director
- Group Facilities Manager
- Group Operations Manager
- WHSEQ Manager
- Human Resources Manager

The WHSEQ Manager is responsible for ensuring that the meeting is minuted, that actions and completion dates are communicated to Managers and for following-up meeting actions to ensure that they are carried out effectively. The outputs of the management review include decisions related to continual improvement opportunities and any need for changes to the EMS.

EMS Operational Requirements

In preparing for the annual review information and data is to be collated. in readiness to facilitate the review process and allow the consideration of:

- The status of actions instigated from previous management reviews;
- Changes in external and internal issues
- Environment Management Policy and & Scope Review
- EMS Strategic & Tactical Objectives & Targets
- Internal & External and Process Audits Results
- Improvements, Nonconformities and Corrective Actions
- Communication, Awareness and Training
- EMS Performance
- Environment Management Activities
- General Business

10 IMPROVEMENT

10.1 General

Non-conformities (or an incident) that have the potential to affect the EMS can arise through systematic or operational failures or behaviours. The Facilities Manager is responsible for taking corrective action under CBC-PROC-047 Corrective Action Procedure and or CBC-PROC-001 Control of Non-Conformity Procedure, or in emergency response scenarios under in the CBC-PROC-068 Emergency Management Procedure.

A Non-conformity is:

- A deficiency in characteristic/documentation or procedure which renders the Environment of a product, service, or process unacceptable or indeterminate in its current form according to specified contractual requirements.

A corrective action is:

- Action taken to address a non-conformance or other undesirable situation.

10.2 Nonconformity and Corrective Action

EMS Tactical Requirements

Minor and major non-conformities are to be investigated with actions for resolution. In the event of non-conformity leading to an accident or environmental incident (boundary areas outside of the systematic focus of the EMS) the Facilities Manager is to pass information to the Zero Harm delegate for action. Where required a full investigation of the abnormal circumstance are conducted and a report generated to ensure that any lessons are learned.

Any failure to meet objectives and contractual requirements within the EMS are identified during regular monitoring and measurement practices section. Any necessary actions are identified at actioned accordingly.

The WHSEQ Manager, supported by The Group Facilities Manager is responsible for the review and update of procedures as required and the assurance that they incorporate, in particular, the prevention of re-occurrence of non-conformities and the prevention of potential non-conformities.

The WHSEQ Manager is responsible for the review of processes to evaluate the need for action to prevent non-conformities and implement actions to avoid their occurrence.

- The requirements and responsibilities for corrective actions are identified in CBC-PROC-047 Corrective Action Procedure and or CBC-PROC-001 Control of Non-Conformity Procedure

EMS Operational Requirements

- Employees have a duty to report any observed nonconformity or incident (real or potential) in a timely manner to their immediate manager, the immediate Manager is to report to the WHSEQ Manager. The WHSEQ Manager will investigate in accordance with CBC-PROC-047 Corrective Action Procedure and or CBC-PROC-001 Control of Non-Conformity Procedure

The EMS requires employees to report and react (without compromising safety) to the nonconformity or incident, and for individuals and managers to:

- Take action to control and correct it
- Deal with the consequences

The EMS requires Facilities Manager, aided by the WHSEQ Manager to:

- Evaluate the need for action to eliminate the causes of the nonconformity or incident, in order that it does not occur or recur elsewhere, by
- Reviewing the nonconformity or incident
- Determining the causes of nonconformity or incident
- Determining if similar nonconformities exist, or could potentially occur

- Implement any action needed commensurate to the effects of the nonconformity or incident
- Review the effectiveness of any corrective action taken
- Recommend and or make changes to the EMS, if necessary
- The EMS requires information regarding the nonconformity, the response, and evaluation of the response to be documented in accordance with CBC-PROC-047 Corrective Action Procedure and or CBC-PROC-001 Control of Non-Conformity Procedure.

Preventative Action

General

CBC recognises the importance of identifying and mitigating non-conformances and preventative actions in order to maintain Levels of Service and to optimise Environment performance and its operational life.

Preventive actions, which include predictive actions, are:

- Action taken to address a potential non-conformance or other undesirable situation.

The Facilities Managers are required to proactively identify potential failures in Environment performance and evaluate the need for preventive action. If and when a potential failure is identified the processes within this EMS.

EMS Tactical Requirements

The EMS requires projects to use, implement and maintain the processes for initiating preventive or predictive action(s). CBC-PROC-047 Corrective Action Procedure and or CBC-PROC-001 Control of Non-Conformity Procedure is to be consulted for instruction on Preventive Actions.

EMS Operational Requirements

The EMS requires the Facilities Managers in conjunction with the WHSEQ Manager to consider:

- The use of relevant sources of information;
- The identification of any potential failures;
- The use of the Business Improvement Procedure
- The initiation and implementation of preventive action;
- The recording of any changes in processes and procedures resulting from the preventive action;
- Assessment of the preventive action and the evaluation of the relative success of implemented measures;
- The input to the individual HSEQ Plan(s) from preventive actions;
- The need to keep documented information on the preventive or predictive actions.

10.3 Continual Improvement

General

CBC is committed to continual improvement and the process of seeking to continually improve the way Environment are managed, the performance of Environment and value for money services that operations deliver.

As part of the business improvement process this is an approach to determine the opportunities and assessing, prioritising and implementing actions to achieve continual improvement and reviewing their subsequent effectiveness. The business improvement process draws upon data and information from:

- Non-conformity and corrective action
- Preventive action
- Trends in performance
- Evaluation of compliance
- Internal and external audits
- Management review
- Stimulating employees to come forward with suggestions
- Management of change

CBC actively encourages employees to actively seek and acquire knowledge about new Environment management technology and practices and evaluated the potential benefits to the business and the EMS. Examples include:

- Active participation in professional bodies and industry associations
- Conferences, seminars, publications, (online) forums, journals
- Benchmarking and technology transfer initiatives, and competitor check-ups
- Engaging specialist organisations
- Research and development
- Consultation of suppliers and customers

EMS Tactical Requirements

The WHSEQ Manager in support of The Group Facilities Manager is to review and where possible improve the suitability, adequacy and effectiveness of the management of Environment and the EMS.

CBC-PROC-047 Corrective Action Procedure and CBC-PROC-046 Internal Audit Procedure are to be used to meet expectations for Continual Improvement

EMS Operational Requirements

The EMS requires Operational employees to:

- Use CBC-PROC-047 Corrective Action Procedure as part of Business Improvement
- Identify any improvement needs and potential
- Evaluate options
- Estimate and determine the financial and non-financial consequences
- Risk assess and initiate any change management response aspects
- Link with decision-making criteria and the objectives of the EMS
- Be responsible for selection and execution
- Track and review outcomes

ISO14001 Element	Requirement	EMS Section	How CBC EMS covers ISO Element	Reference Number
4.1	Understanding the organisational context	4.1	<ul style="list-style-type: none"> ▪ Legal and Other Requirements ▪ Context of the Organisation Register ▪ Objectives & Target Register 	<ul style="list-style-type: none"> ▪ CBC-REG-002 ▪ CBC-REG-029 ▪ CBC-REG-026
4.2	Understanding the Needs and Expectations of Stakeholders	4.2	<ul style="list-style-type: none"> ▪ Context of the Organisation Register ▪ Legal and Other Requirements Register ▪ Objectives & Target Register ▪ HSEQ Plan ▪ Monitoring and Measuring Procedure 	<ul style="list-style-type: none"> ▪ CBC-REG-029 ▪ CBC-REG-002 ▪ CBC-REG-026 ▪ CBC-PLN-011 ▪ CBC-PROC-057
4.3	Scope of the Environment Management System	4.3	<ul style="list-style-type: none"> ▪ EMS ▪ HSEQ Plan 	CBC-EMS-001 CBC-PLN-011
4.4	EMS	4.4	<ul style="list-style-type: none"> ▪ EMS ▪ Policies ▪ Procedures ▪ Forms 	CBC-EMS-001 CBC-POL-002 Refer to CBC-REG-001 Refer to CBC-REG-001
5.1	Leadership and commitment	5.1	<ul style="list-style-type: none"> ▪ Roles and Responsibilities Form ▪ Levels of Financial Authority Register ▪ Org Chart 	CBC-FORM-076 CBC-REG-005 G Drive Org Chart
5.2	EMS Policy	5.2	<ul style="list-style-type: none"> ▪ Policy 	CBC-POL-002
5.3	Organization, Roles, Responsibilities and Authorities	5.3	<ul style="list-style-type: none"> ▪ Roles and Responsibilities in EMS ▪ Roles and Responsibilities Form ▪ Level of Financial Authority ▪ Org Chart 	CBC-EMS-001 CBC-FORM-076 CBC-REG-005 G Drive – Org Charts
6.1.1	Actions to address risks and opportunities – General	6.1.1	<ul style="list-style-type: none"> ▪ Context of the Organisation Register ▪ Project Risk Register ▪ Project HSEQ Plans 	CBC-REG-029 TBC CBC-PLN-011
6.1.2	Environmental Aspects	6.1.2	<ul style="list-style-type: none"> ▪ Aspects & Impacts Register 	CBC-REG-004
6.1.3	Compliance Obligations	6.1.3	<ul style="list-style-type: none"> ▪ Legal and Other Requirements Register 	CBC-REG-002
6.1.4	Planning Action	6.1.4	<ul style="list-style-type: none"> ▪ HSEQ ▪ Risk Assessment 	CBC-PLN-011 TBC

ISO14001 Element	Requirement	EMS Section	How CBC EMS covers ISO Element	Reference Number
6.2.1	Environmental Objectives	6.2.1	<ul style="list-style-type: none"> Objectives and Targets Register 	CBC-REG-026
6.2.2	Planning actions to achieve environmental objectives	6.2.2	<ul style="list-style-type: none"> HSEQ Plans EMS Policy Internal Audits Management Review 	CBC-PLN-011 CBC-EMS-001 CBC-POL-002 CBC-FORM-031 CBC-FORM-034
7.1	Resources	7.1	<ul style="list-style-type: none"> EMS Roles Org Charts Project HSEQ Plans CBC CMMS 	CBC-EMS-001 G Drive – Org Charts CBC-PLN-011 CMMS
7.2	Competence	7.2	<ul style="list-style-type: none"> EMS Roles & Responsibilities Training records in CBC CMMS HR Induction Certificate Training Recommendation Record 	CBC-EMS-001 CMMS IAuditor CBC-FORM-083
7.3	Awareness	7.3	<ul style="list-style-type: none"> Training Records in CBC CMMS HR Induction Certificate Toolboxes Team Meetings 	CMMS IAuditor CBC-FORM-229 U Drive – Project Folders
7.4.1	Communication – General	7.4.1	<ul style="list-style-type: none"> EMS 	CBC-EMS-001
7.4.2	Internal Communications	7.4.2	<ul style="list-style-type: none"> Management Review Client Meetings Toolboxes Team Meetings Emails 	CBC-FORM-034 U Drive – Project Folders CBC-FORM-229 U Drive – Project Folders CBC-REG-028
7.4.3	External Communications	7.4.3	<ul style="list-style-type: none"> Client Meetings Emails 	U Drive – Project Folders Email

ISO14001 Element	Requirement	EMS Section	How CBC EMS covers ISO Element	Reference Number
7.5.1	Documented Information - General	7.5.1	<ul style="list-style-type: none"> ▪ EMS 	CBC-EMS-001
7.5.2	Creating and Updating	7.5.2	<ul style="list-style-type: none"> ▪ Document Register ▪ Control of Document and Records Procedure 	CBC-REG-001 CBC-PROC-037
7.5.3	Control of documented information	7.5.3	<ul style="list-style-type: none"> ▪ CBC Business System ▪ Document Register ▪ Project Set Up Procedure ▪ HSEQ Plans ▪ Project Filing Index ▪ Control of Documents and Records Procedure 	G Drive CBC-REG-001 CBC-PROC-097 CBC-PLN-011 U Drive CBC-PROC-037
8.1	Operation planning and control	8.1	<ul style="list-style-type: none"> ▪ EMS ▪ EMS – Roles and Responsibilities ▪ HSEQ Plans ▪ CBC CMMS ▪ Aspects and Impacts Register ▪ Risk Assessment ▪ Project Risk Register ▪ Purchasing Procedure ▪ Best in Class Provider Pack ▪ Work Instructions ▪ Meeting Minutes ▪ Contractor Management Procedure ▪ Monitoring and Measurement Procedure ▪ Management Review 	CBC-EMS-001 CBC-EMS-001 CBC-PLN-011 CMMS CBC-REG-004 TBC TBC CBC-PROC-110 CBC-FORM-090 CMMS U Drive – Project Folders CBC-PROC-124 CBC-PROC-057 CBC-FORM-034
8.2	Emergency preparedness and response	8.2	<ul style="list-style-type: none"> ▪ Aspects and Impacts Register ▪ EMS ▪ Emergency Response Plan 	CBC-REG-004 CBC-EMS-001 TBC

ISO14001 Element	Requirement	EMS Section	How CBC EMS covers ISO Element	Reference Number
9.1.1	Monitoring, measurement, analysis and evaluation – General	9.1.1	<ul style="list-style-type: none"> ▪ Management Review ▪ Client KPI's ▪ Site Audits ▪ Corrective Action Procedure ▪ Control of Non-Conformity Procedure ▪ Corrective Action Report ▪ Corrective Action Register ▪ Monitoring and Measurement Procedure 	CBC-FORM-034 HSEQ Plans IAuditor CBC-PROC-047 CBC-PROC-001 CBC-FORM-182 CBC-REG-028 CBC-PROC-057
9.1.2	Evaluation of compliance	9.1.2	<ul style="list-style-type: none"> ▪ Legal and Other Requirements ▪ Internal Audit 	CBC-REG-002 CBC-FORM-031
9.2.1	Internal Audit – General	9.2.1	<ul style="list-style-type: none"> ▪ Internal Audit ▪ Internal Audit Schedule ▪ Internal Audit Procedure ▪ Change Request Form ▪ Change Management Procedure ▪ Change Management Register 	CBC-FORM-031 CBC-FORM-032 CBC-PROC-046 CBC-FORM-033 CBC-PROC-021 CBC-REG-030
9.2.2	Internal Audit Program	9.2.2	<ul style="list-style-type: none"> ▪ Audit Schedule 	CBC-FORM-012
9.3	Management Review	9.3	<ul style="list-style-type: none"> ▪ Policy ▪ Context of the Organisation Register ▪ Objectives and Targets Register ▪ Management Review Minutes of Meetings 	CBC-POL-003 CBC-REG-029 CBC-REG-026 CBC-FORM-034
10.1	Improvement – General	10.1	<ul style="list-style-type: none"> ▪ EMS 	CBC-EMS-001
10.2	Nonconformity and corrective action	10.2	<ul style="list-style-type: none"> ▪ Correction Action Procedure ▪ Control of Non-Conformity Procedure ▪ Correction Action Form ▪ Corrective Action Register 	CBC-PROC-047 CBC-PROC-001 CBC-FORM-182 CBC-REG-028

ISO14001 Element	Requirement	EMS Section	How CBC EMS covers ISO Element	Reference Number
10.3	Continual Improvement	10.3	<ul style="list-style-type: none"> ▪ Corrective Action Procedure ▪ Control of Non-Conformity Procedure ▪ Corrective Action Form ▪ Corrective Action Register ▪ Internal Audit ▪ Internal Audit Procedure ▪ Internal Audit Schedule ▪ Change Request Form ▪ Change Management Procedure ▪ Change Management Register ▪ Management Review 	CBC-PROC-047 CBC-PROC-001 CBC-FORM-182 CBC-REG-028 CBC-FORM-031 CBC-PROC-046 CBC-FORM-032 CBC-FORM-033 CBC-PROC-021 CBC-REG-030 CBC-FORM-094