

VPK LTD

ENVIRONMENTAL MANUAL

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MANUAL IDENTIFICATION

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Title.....

Signed:.....

Environmental Manager

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DATE	PAGE NUMBER	PROCEDURE NUMBER	REVISION DETAILS	ISSUE NUMBER

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FOREWORD

This Environmental Manual is the means by which VPK Ltd (the 'Organisation') satisfies the requirements of ISO 14001 : 2015 ('the International Standard').

The Organisation is obliged to ensure that its Environmental Policy is fully and completely understood by its employees, and that its procedures are implemented and maintained at all times. This Environmental Manual is in accordance with the requirements of **BS EN ISO 14001 : 2015**. All of the components of the Environmental Management System shall be periodically and systematically reviewed by both internal and external Environmental Audit procedures.

The Environmental Manager, appointed by the Organisation's Managing Director, is responsible for the control of all matters relating to the implementation of these procedures.

The assurance of environmental compliance is fundamental to all the work undertaken by the Organisation. All personnel at every level in the Organisation's structure shall practise the procedures established.

The potential benefits to the Organisation of implementing this Environmental Management System are:

- a) To protect the environment by preventing or mitigating adverse Environmental Impacts
- b) To mitigate the potential adverse effect of environmental conditions on the Organisation
- c) To assist the Organisation in the fulfilment of compliance obligations
- d) To enhance environmental performance
- e) To control or influence the way the Organisation's products and services are designed, manufactured, distributed, consumed and disposed of by using a life cycle perspective that can prevent Environmental Impacts from being unintentionally shifted elsewhere within the life cycle
- f) To achieve financial and operational benefits that can result from implementing environmentally sound alternatives that strengthen the Organisation's market position
- g) To communicate environmental information to relevant interested parties.

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PROFILE

VPK Ltd (the 'Organisation') has been delivering high end refurbishment and fit-out projects for both residential and commercial sectors in and around London since 2007.

With our extensive knowledge in the internal fit-out sector and vast investment in machinery and software we pride ourselves in being able to manufacture either high production runs or more intricate one off bespoke items along with the benefit of a full installation option if desired.

Our reputation is built on quality, reliability and flexibility to be able to bring a design concept to Life. From the initial design brief, we will produce full manufacturing drawings for approval before manufacturing commences. Clients are encouraged to visit us at our manufacturing facility in Waltham Abbey to see their project evolve from what was once only a vision.

With the interaction of both technology and traditional craftsmanship, high-quality solutions to modern day requirements are produced without compromising on aesthetic values.

Having decided to develop and implement an ISO 14001 compliant Environmental Management System we ensure that the entire team is environmentally aware, understands the importance of environmental protection and promotes sustainability in the solutions provided to our customers.

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ENVIRONMENTAL POLICY

VPK Ltd (the ‘Organisation’) recognises the importance of environmental protection and is committed to operating its business responsibly and in fulfilment of its compliance obligations relating to the provision of mass produced and bespoke joinery products.

It is the Organisation’s declared policy to operate with and to maintain good relations with all regulatory bodies.

It is the Organisation’s objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements, to protect the environment and to continually improve the Environmental Management System to enhance environmental performance through the implementation of the following:

- a) Assess and regularly re-assess the environmental effects of the Organisation’s activities
- b) Training of employees in environmental issues
- c) Minimise the production of waste
- d) Minimise material wastage
- e) Minimise energy wastage
- f) Promote the use of recyclable and renewable materials
- g) Prevent pollution in all its forms
- h) Control noise emissions from operations
- i) Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation.

Top management demonstrates leadership and commitment with respect to the Environmental Management System by:

- a) Taking accountability for the effectiveness of the Environmental Management System
- b) Ensuring that the Environmental Policy and Environmental Objectives are established and are compatible with the strategic direction and the context of the Organisation
- c) Ensuring the integration of the Environmental Management System requirements into the Organisation’s business processes
- d) Ensuring that the resources needed for the Environmental Management System are available
- e) Communicating the importance of effective environmental management and of conforming to the environmental management system requirements
- f) Ensuring that the Environmental Management System achieves its intended outcomes
- g) Directing and supporting persons to contribute to the effectiveness of the environmental management system
- h) Promoting continual improvement
- i) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to interested parties.

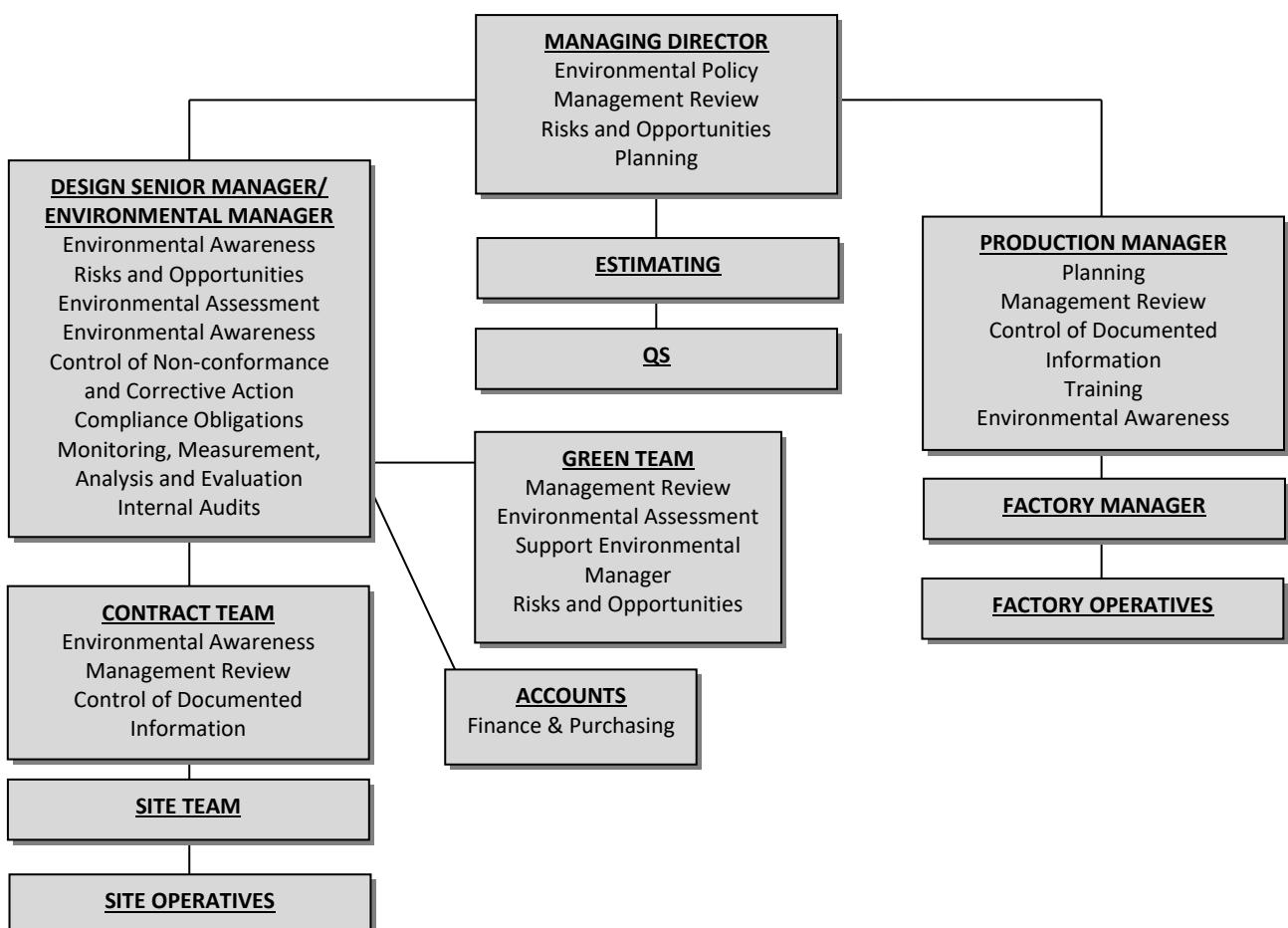
Signed **Name** **Position**

Date.....

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ENVIRONMENTAL STRUCTURE CHART



This chart establishes responsibilities and lines of internal communication within the Environmental Management System and does not necessarily portray other management structures.

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1 - SCOPE

The scope of the Organisation's certification is defined within the Environmental Policy and is recorded on the ISO 14001 Certificate. As a minimum this Environmental Manual addresses all requirements for conformance with BS EN ISO 14001 : 2015 in pursuit of any activities falling within the scope of its certification.

The International Standard specifies the requirements for an Environmental Management System that an organisation can use to enhance its environmental performance. The International Standard is intended for use by an organisation seeking to manage its environmental responsibilities in a systematic manner that contributes to the environmental pillar of sustainability.

The International Standard helps an organisation to achieve the intended outcomes of its Environmental Management System, which provide value for the environment, the Organisation itself and interested parties. Consistent with the Organisation's Environmental Policy, the intended outcomes of the Environmental Management System include:

- a) Enhancement of environmental performance
- b) Fulfilment of compliance obligations
- c) Achievement of Environmental Objectives.

The International Standard is applicable to any organisation, regardless of size, type and nature, and applies to the Environmental Aspects of its activities, products and services that the organisation determines it can either control or influence considering a life cycle perspective. The International Standard does not state specific environmental performance criteria.

The International Standard can be used in whole or in part to systematically improve environmental management. Claims of conformity to this International Standard, however, are not acceptable unless all its requirements are incorporated into the Organisation's Environmental Management System and fulfilled without exclusion.

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2 - NORMATIVE REFERENCES

At the time that this Environmental Manual was prepared, there were no normative references.

Parties to agreements based on ISO 14001 : 2015 are encouraged to adopt the amendments contained in any subsequent editions of the International Standard that may be published. Members of ISO and IEC maintain registers of currently valid International Standards.

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3 - TERMS AND DEFINITIONS

3.1 Terms related to organisation and leadership

3.1.1 Management System

Set of interrelated or interacting elements of an *organisation* (3.1.4) to establish policies and *objectives* (3.2.5) and *processes* (3.3.5) to achieve those objectives.

3.1.2 Environmental Management System

Part of the *management system* (3.1.1) used to manage *Environmental Aspects* (3.2.2), fulfil *compliance obligations* (3.2.9), and address *risks and opportunities* (3.2.11).

3.1.3 Environmental policy

Intentions and direction of an *organisation* (3.1.4) related to *environmental performance* (3.4.11), as formally expressed by its *top management* (3.1.5).

3.1.4 Organisation

Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its *objectives* (3.2.5).

3.1.5 Top management

Person or group of people that directs and controls an *organisation* (3.1.4) at the highest level.

3.1.6 Interested party

Person or *organisation* (3.1.4) that can affect, be affected by, or perceive itself to be affected by a decision or activity.

3.2 Terms related to planning

3.2.1 Environment

Surroundings in which an *organisation* (3.1.4) operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.

3.2.2 Environmental Aspect

Element of an *organisation's* (3.1.4) activities or products or services that interacts or can interact with the *environment* (3.2.1).

3.2.3 Environmental condition

State or characteristic of the *environment* (3.2.1) as determined at a certain point in time.

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3 - TERMS AND DEFINITIONS (continued)

3.2.4 Environmental Impact

Change to the *environment* (3.2.1), whether adverse or beneficial, wholly or partially resulting from an *organisation's* (3.1.4) *Environmental Aspects* (3.2.2).

3.2.5 Objective

Result to be achieved.

3.2.6 Environmental Objective

Objective (3.2.5) set by the *organisation* (3.1.4) consistent with its *Environmental Policy* (3.1.3).

3.2.7 Prevention of pollution

Use of *processes* (3.3.5), practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse *Environmental Impacts* (3.2.4).

3.2.8 Requirement

Need or expectation that is stated, generally implied or obligatory.

3.2.9 Compliance obligations (preferred term)

Legal requirements and other requirements (admitted term)

Legal *requirements* (3.2.8) that an *organisation* (3.1.4) has to comply with and other requirements that an organisation has to or chooses to comply with.

3.2.10 Risk

Effect of uncertainty.

3.2.11 Risks and opportunities

Potential adverse effects (threats) and potential beneficial effects (opportunities).

3.3 Terms related to support and operation

3.3.1 Competence

Ability to apply knowledge and skills to achieve intended results.

3.3.2 Documented information

Information required to be controlled and maintained by an *organisation* (3.1.4) and the medium on which it is contained.

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3 - TERMS AND DEFINITIONS (continued)

3.3.3 Life cycle

Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

3.3.4 Outsource (verb)

Make an arrangement where an external *organisation* (3.1.4) performs part of an organisation's function or *process* (3.3.5).

3.3.5 Process

Set of interrelated or interacting activities which transforms inputs into outputs.

3.4 Terms related to performance evaluation and improvement

3.4.1 Audit

Systematic, independent and documented *process* (3.3.5) for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

3.4.2 Conformity

Fulfilment of a *requirement* (3.2.8).

3.4.3 Non-conformity

Non-fulfilment of a *requirement* (3.2.8).

3.4.4 Corrective action

Action to eliminate the cause of a *non-conformity* (3.4.3) and to prevent recurrence.

3.4.5 Continual improvement

Recurring activity to enhance *performance* (3.4.10).

3.4.6 Effectiveness

Extent to which planned activities are realised and planned results achieved.

3.4.7 Indicator

Measurable representation of the condition or status of operations, management or conditions.

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3 - TERMS AND DEFINITIONS (continued)

3.4.8 Monitoring

Determining the status of a system, a *process* (3.3.5) or an activity.

3.4.9 Measurement

Process (3.3.5) to determine a value.

3.4.10 Performance

Measurable result.

3.4.11 Environmental performance

Performance (3.4.10) related to the management of *Environmental Aspects* (3.2.2).

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4 - CONTEXT OF THE ORGANISATION

4.1	Understanding the Organisation and its context
Summary of Requirements	External and internal issues relevant to the Organisation's purpose and having a bearing on its ability to accomplish the intended outcomes of its Environmental Management System shall be determined, e.g. issues such as environmental conditions which either affect or may potentially affect the Organisation.

	STATEMENT/PROCEDURE
1.	<p>External context is evaluated and documented in the process of business planning, strategic review and the development of Environmental Policy taking into account such factors as:</p> <ul style="list-style-type: none">a) Environmental conditions under which the Organisation operatesb) The social and cultural environmentc) The political environmentd) The legal and regulatory environmente) The market environmentf) The technological environmentg) The economic environmenth) The natural environmenti) The competitive environmentj) The geographical scope of each environmentk) Key drivers and trends.
2.	<p>The Organisation's internal context, within which it seeks to achieve its objectives, is similarly evaluated and documented, taking into account such factors as:</p> <ul style="list-style-type: none">1. Governance2. Organisational structure, roles and accountabilities3. Policies, objectives and the strategies that are in place to achieve them4. Capabilities, in terms of resources and knowledge5. Information systems, information flows and decision-making processes6. Organisational culture7. Standards, guidelines and models8. Contractual relationships.

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4 - CONTEXT OF THE ORGANISATION

4.1	Understanding the Organisation and its context (continued)
3.	The external and internal context is reviewed at least annually in the ISO 14001 Management Review and the resultant discussions are commented in the review record.

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4 - CONTEXT OF THE ORGANISATION

4.2	Understanding the needs and expectations of interested parties
Summary of Requirements	<p>The Organisation is to determine the following:</p> <ul style="list-style-type: none">a) Any interested parties playing a role in the Environmental Management Systemb) Any related needs or expectations (i.e. requirements) of these interested partiesc) Which of these needs and expectations are effectively its compliance obligations.

	STATEMENT/PROCEDURE
1.	<p>The interested parties that are relevant to the Environmental Management System are defined as:</p> <ul style="list-style-type: none">1. Customers2. Employees3. Providers4. Management Team5. Local Authorities6. The Environment Agency7. Other Statutory and Regulatory bodies8. Neighbours.
2.	<p>The significant needs and expectations of these interested parties include:</p> <ul style="list-style-type: none">1. Maintaining energy efficient premises and vehicles that cause minimal pollution2. Keeping a strong emphasis on sustainability in activities and infrastructure3. Sourcing and researching green materials and technologies for customers4. Adhering to environmental legal and regulatory requirements5. Ensuring that all personnel are environmentally aware6. Using providers with a suitable environmental policy and commitment to environmental improvement7. Optimising journey planning to minimise mileage, fuel usage and pollution8. Exercising strong environmental controls in operations.
3.	<p>The Organisation's compliance obligations have been determined and are documented in the Legal Compliance Register.</p>

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4 - CONTEXT OF THE ORGANISATION

4.3	Determining the scope of the Environmental Management System
Summary of Requirements	<p>The limitations and applicability of the Environmental Management System are to be determined to set out its scope.</p> <p>The Organisation shall consider the following when determining this scope:</p> <ul style="list-style-type: none">a) Any external or internal issues cited in 4.1b) The compliance obligations cited in 4.2c) The Organisation's units, functions and physical confinesd) Activities and services carried out and products produced by the Organisatione) The Organisation's authority and capacity to carry out any activities related to control and influence. <p>Having defined the scope, the Environmental Management System is to include all of the Organisation's activities, products and services within that scope.</p> <p>Interested parties requiring access to the scope are to be granted this and it is to be kept as documented information and made available.</p>

	STATEMENT/PROCEDURE
1.	<p>Taking into account the output from Sections 4.1 and 4.2 above, along with the activities, products and services of the Organisation, management ensures that this Environmental Manual includes:</p> <ol style="list-style-type: none">1. The defined scope of the Environmental Management System with any non-applicable clauses identified and justified2. Documented procedures or reference to them within other documents3. A description of the interaction of processes.
2.	Effective implementation of the Environmental Management System is monitored on an informal basis, as part of the Organisation's day-to-day operations.

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4 - CONTEXT OF THE ORGANISATION

4.4	Environmental Management System
Summary of Requirements	<p>The Organisation shall set out, put into practice, maintain and continue to improve an Environmental Management System in order to realise its intended outcomes; these include the improvement of the Organisation's environmental performance. The Environmental Management System should detail any necessary procedures and the way in which they interrelate which should be in keeping with the obligations laid out by the International Standard.</p> <p>When setting up and maintaining the Environmental Management System, any information gained in 4.1 and 4.2 shall be considered by the Organisation.</p>

	STATEMENT/PROCEDURE
1.	<p>As part of the implementation of this Environmental Management System, and bearing in mind the knowledge gained from Sections 4.1 and 4.2, the Organisation has identified and documented in this Manual:</p> <ol style="list-style-type: none">1. The processes needed for the Environmental Management System2. The sequence and interaction of these processes3. The criteria and methods used to ensure the effective operation and control of these processes, including responsibilities and authorities4. The means to ensure the availability of the resources and the information necessary to support the operation, monitoring and continual improvement of these processes5. The risks and opportunities as determined in accordance with the requirements of Section 6.16. The processes used to measure where applicable, monitor and analyse these processes and implement action necessary to achieve planned results and monitor continual improvement.

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4 - CONTEXT OF THE ORGANISATION

4.4	Environmental Management System (continued)
2.	<p>The Environmental Management System is based on the following process model:</p> <p>Internal and external issues</p> <p>Context of the organization</p> <p>Needs and expectations of interested parties</p> <p>Scope of the environmental management system</p> <p>P</p> <p>Planning</p> <p>A</p> <p>Improvement</p> <p>D</p> <p>Support and Operation</p> <p>C</p> <p>Performance evaluation</p> <p>Leadership</p> <p>Intended outcomes</p>
3.	<p>As part of the Management Review process, the Organisation reviews the Environmental Management System and, when required, makes changes in order to ensure that it continues to meet management requirements and market conditions.</p>

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5 - LEADERSHIP

5.1	Leadership and commitment
Summary of Requirements	<p>Necessary commitment and leadership shall be put into effect by top management regarding the Environmental Management System through the following:</p> <ul style="list-style-type: none">a) The acceptance of responsibility for the effective use of the Environmental Management Systemb) The Environmental Policy and Environmental Objectives should be set out and in keeping with the strategic direction of the Organisation and the nature of the Organisation's activitiesc) The Organisation should ensure that any obligations within the Environmental Management System are integrated into the Organisation's own proceduresd) There should be easy access to any resources required for the Environmental Management Systeme) The role of good environmental management and of following any environmental management system requirementsf) Making sure the Environmental Management System fulfils its intended outcomesg) The direction and support of individuals resulting in an effectively managed Environmental Management Systemh) The promotion of continual improvementi) The support of other individuals on the management team to facilitate leadership in accordance with their roles.

	STATEMENT/PROCEDURE
1.	The Environmental Policy includes a commitment from management to demonstrate leadership and commitment with regard to the Environmental Management System in accordance with the requirements of the International Standard.

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5 - LEADERSHIP

5.2	Environmental Policy
Summary of Requirements	<p>An Environmental Policy is to be set up, put into practice and maintained by top management. The Policy shall, within the scope of its Environmental Management System:</p> <ul style="list-style-type: none">a) Be appropriate to the Organisation's aims and activities, including the nature, scale and environmental impacts of its activities, products and servicesb) Offer a framework for establishing Environmental Objectivesc) Comprise actions to safeguard the protection of the environment; these include preventing pollution and other specific aim(s) relevant to the Organisation's activitiesd) Comprise a commitment relating to its compliance obligationse) Comprise a commitment relating to the continual improvement of the Environmental Management System to facilitate an improvement in environmental performance. <p>The Environmental Policy shall:</p> <ul style="list-style-type: none">a) Be maintained as documented informationb) Be made known to individuals within the Organisationc) Be made available to interested parties.

	STATEMENT/PROCEDURE
1.	The Organisation's Environmental Policy is documented earlier in this Environmental Manual and fulfils the requirements summarised above.
2.	In order to provide evidence of the Organisation's commitment to the Environmental Policy, it is regularly reviewed and any changes are approved as part of the formal Management Review proceedings. These reviews and all approved changes are recorded in the minutes of the Management Reviews.
3.	Copies of the Environmental Policy are made available to all members of staff. A summary of the salient points arising in Management Reviews are provided to the Team as a means of communicating the effectiveness of the Environmental Management System.
4.	Copies of the Environmental Policy are made available to relevant interested parties, where considered appropriate to do so.

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5 - LEADERSHIP

5.3	Organisational roles, responsibilities and authorities
Summary of Requirements	<p>Appointment and communication of responsibilities and authorities for company roles within the Organisation are ensured by top management.</p> <p>Responsibility and authority for the following shall be allocated by top management:</p> <ul style="list-style-type: none">a) Ensuring that the Environmental Management System meets the requirements of the International Standardb) Relating any information regarding the performance of the Environmental Management System to top management, including environmental performance.

	STATEMENT/PROCEDURE
1.	<p>Responsibilities and authorities, together with the job title of those responsible for communicating them throughout the Organisation, are illustrated on the Environmental Structure Chart in this Manual.</p>
2.	<p>The Managing Director ensures that, at all times, a nominated member of staff, referred to in this Manual as the Environmental Manager, has responsibility for the following:</p> <ul style="list-style-type: none">1. Overall administration of the Environmental Management System2. Monitoring legal requirements and reviewing compliance3. Ensuring good internal communication4. Managing communications with external parties5. Ensuring that suitable training is provided6. Preparing and implementing the Environmental Assessments7. Providing environmental guidelines and/or procedures to staff8. Ensuring that all necessary monitoring and measuring methods are implemented9. Ensuring that the environmental credentials of providers are checked10. Monitoring corrective actions resulting from non-conformance11. Ensuring that documents and records are properly managed12. Reporting to top management on the performance of the Environmental Management System13. Ensuring that Internal Audits and Management Reviews are conducted14. Making all records and information available to the QMS International.

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5 - LEADERSHIP

5.3	Organisational roles, responsibilities and authorities (continued)
3.	The Green Team provides continuous support to the Environmental Manager. The team meets informally to discuss the Organisation's Environmental Aspects and to develop ideas for improving awareness and performance. Some or all of the members of the Green Team participate in the Management Review described in Section 9.3.
4.	The identification of revised or additional resources required to implement and improve the processes of the Environmental Management System takes place as part of day-to-day management as well as part of the Management Review procedures described in Section 9.3.

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6 - PLANNING

6	Planning
6.1	Actions to address risks and opportunities
6.1.1	General <p>Summary of Requirements</p> <p>The Organisation shall set up, put into practice and maintain any necessary procedures to meet the requirements in 6.1.1 to 6.1.4.</p> <p>The Organisation shall consider the following when setting up the Environmental Management System:</p> <ul style="list-style-type: none">a) The points covered in 4.1b) The requirements stated in 4.2c) The scope of the Organisation's Environmental Management System <p>and determine the risks and opportunities relating to the following:</p> <ul style="list-style-type: none">a) Environmental aspects (see 6.1.2)b) Compliance obligations (see 6.1.3)c) Other issues and requirements, as detailed in 4.1 and 4.2 <p>that need to be undertaken so that:</p> <ul style="list-style-type: none">a) Assurance may be given that the Environmental Management System can achieve its intended outcomesb) Undesired effects, including the possibility of external environmental conditions affecting the Organisation, may be prevented or reducedc) Continual improvement may be achieved. <p>The Organisation shall determine potential emergency situations, including those that can have an environmental impact, within the scope of the Environmental Management System. Documented information of the following shall be maintained by the Organisation:</p> <ul style="list-style-type: none">d) Risks and opportunities that require attentione) Required processes in 6.1.1 to 6.1.4, to the extent necessary to be sure that they are carried out as planned.

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6 - PLANNING

6	Planning (continued)
	STATEMENT/PROCEDURE
1.	Environmental Management System planning forms part of the Management Review process described in Section 9.3.
2.	The Organisation holds regular management and operational review meetings to set and monitor the environmental related Objectives, ensuring that risks and opportunities are included as part of this process to the extent considered necessary. The management team reviews the Environmental System in order to ensure that it addresses all relevant processes and verification requirements.
3.	Processes that are necessary to facilitate the service provided are determined, planned and implemented in accordance with the relevant procedures described in Section 8.1 of this Manual. The effectiveness of the documented procedures is subject to regular Management Review and any revisions or improvements are made as necessary.
4.	The risks and opportunities that can affect conformity to the International Standard are determined and addressed by inclusion in all relevant decision-making processes to the extent considered necessary.
5.	Wherever risks and opportunities are identified, and where considered appropriate by management, suitable treatment is documented on the Risks and Opportunities Log and implemented.

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6 - PLANNING

6.1	Actions to address risks and opportunities (continued)
6.1.2	Environmental Aspects
Summary of Requirements	<p>The Organisation shall determine, within the defined scope of the Environmental Management System, the Environmental Aspects of its activities, products and services that it can have control over and those that can be influenced by the Organisation, and their related Environmental Impacts, considering a life cycle perspective.</p> <p>The Organisation shall take into account the following when determining Environmental Aspects:</p> <ul style="list-style-type: none">a) Possible future change, including planned or new developments, and new or revised activities, products and servicesb) Emergency situations deemed reasonably predictable and unusual circumstances. <p>Those aspects that have or can have a significant Environmental Impact, i.e. significant Environmental Aspects, shall be determined by the Organisation by using criteria in place.</p> <p>Among the various levels and functions of the Organisation, significant Environmental Aspects shall be communicated, as appropriate.</p> <p>Documented information of the following shall be kept by the Organisation:</p> <ul style="list-style-type: none">a) Environmental Aspects and related Environmental Impactsb) Criteria used to determine the Organisation's significant Environmental Aspectsc) Significant Environmental Aspects.

	STATEMENT/PROCEDURE
1.	As part of the initiation of the Environmental Management System, an Environmental Review was carried out during which the Organisation's Environmental Aspects were identified.
2.	Having identified the Organisation's Environmental Aspects, those over which the Organisation can be expected to have control or influence have been identified and the significance of their Environmental Impacts has been assessed.

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6 - PLANNING

6.1.2	Environmental Aspects (continued)
3.	<p>Items included in this and subsequent Environmental Reviews include, but are not limited to:</p> <ol style="list-style-type: none">1. Legal requirements2. Discharges to air, land and water3. Potential CoSHH and Health & Safety aspects of the materials used4. Waste management5. Working practices6. Use of resources7. Providers' environmental profiles8. Products and services purchased:<ol style="list-style-type: none">a) FSC, PEFC, WEEE & RoHSb) Use of new and improved technologiesc) Recycled, sustainable and fair trade options9. Energy consumption/efficiency in all areas10. Carbon footprint (reduction, neutrality, offsetting)11. Consumption of paper12. Vehicles (fuel/engine type, journey planning, maintenance, driving efficiency)13. Water consumption14. Business travel (video or tele-conferencing)15. Potential for environmental emergency.
4.	As a result of the initial and subsequent Environmental Reviews a list of Environmental Aspects and the corresponding Environmental Impacts was compiled and recorded in the Aspects Register.
5.	Those which the Organisation could be expected to have control over, whether as a matter of internal best practice, legal requirement or customer expectation, have been identified and documented in the form of Environmental Assessments.
6.	The continuing significance of the Organisation's Environmental Aspects is assessed as part of the Environmental Manager's day to day responsibility and formally reviewed in the Management Review described in Section 9.3.

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6.1.2	Environmental Aspects (continued)
7.	When conducting the year start Management Review every Environmental Assessment is updated with new targets and objectives. Any Environmental Aspects that could not be included in the Environmental Management System for reasons of practical or financial constraint are reconsidered for feasibility.

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6.1	Actions to address risks and opportunities (continued)
6.1.3	Compliance obligations
Summary of Requirements	<p>The Organisation shall:</p> <ul style="list-style-type: none">a) Determine and be able to access the compliance obligations related to its Environmental Aspectsb) Determine how these compliance obligations may be applied to the Organisationc) Take these compliance obligations into account when setting up, putting into practice, maintaining and continually improving its Environmental Management System. <p>Documented information of the Organisation's compliance obligations shall be maintained by the Organisation.</p>

	STATEMENT/PROCEDURE
1.	The initial and all subsequent Environmental Reviews include a review of all existing and anticipated legislation and regulations that have, or may have, an impact on any of the Organisation's activities.
2.	<p>Environmental updates are obtained from sources that provide specialist guidance and details of relevant changes. These are as follows:</p> <ol style="list-style-type: none">1. Online resources including:<ul style="list-style-type: none">a) www.carbonfootprint.comb) www.gov.uk/topic/environmental-managementc) www.environmental-protection.org.uk.2. Information obtained from selected customers and providers.
3.	Legal requirements that appertain to the Organisation's activities are recorded on the Legal Compliance Register.

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6.1	Actions to address risks and opportunities (continued)
4.	All relevant new legislation and regulations are reviewed as part of day-to-day management activity and more formally during Management Reviews, in order to establish their relevance with regard to the Organisation's activities.
5.	Internal awareness of the legal and other requirements is reinforced through the day to day activities of the Environmental Manager.

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6.1	Actions to address risks and opportunities (continued)
6.1.4	Planning action
Summary of Requirements	<p>The Organisation intends to plan the following:</p> <p>a) To undertake to address its:</p> <ul style="list-style-type: none">a. Significant Environmental Aspectsb. Compliance obligationsc. Risks and opportunities identified in 6.1.1 <p>b) How to:</p> <ul style="list-style-type: none">a. Integrate the actions into its Environmental Management System processes (see 6.2, Clause 7, Clause 8 and 9.1), or other business processes and put these into practiceb. Assess the effectiveness of these actions (see 9.1). <p>The Organisation shall consider its technological alternatives and its financial, operational and business needs when planning these actions.</p>

	STATEMENT/PROCEDURE
1.	The Environmental Manager, in liaison with top management, is responsible for ensuring that the Organisation takes appropriate actions to address its significant Environmental Aspects, compliance obligations and risks and opportunities.
2.	The required actions are fully integrated into the Environmental Management System, and into other relevant business processes throughout the Organisation.
3.	Section 9 (Performance Evaluation) ensures that the effectiveness of the actions is evaluated and documented.

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6.2	Environmental Objectives and planning to achieve them
6.2.1	Environmental Objectives
Summary of Requirements	<p>Environmental Objectives at relevant functions and levels are to be agreed on by the Organisation, bearing in mind its significant Environmental Aspects and related compliance obligations, and considering its risks and opportunities.</p> <p>The Environmental Objectives shall be:</p> <ul style="list-style-type: none">a) In keeping with the Environmental Policyb) Quantifiablec) Monitoredd) Communicatede) Updated as appropriate. <p>Documented information on the Environmental Objectives shall be maintained.</p>
6.2.2	Planning actions to achieve Environmental Objectives

	STATEMENT/PROCEDURE
1.	As part of the Management Review process described in Section 9.3, new or revised targets and objectives are set, either to mitigate adverse environmental impacts or to enhance the environmental benefits of the Organisation's activities, products and/or services.

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6.2	Environmental Objectives and planning to achieve them (continued)
2.	In setting the Organisation's objectives and targets the following considerations are taken into account: <ol style="list-style-type: none">1. The Organisation's legal and other similar requirements2. The Organisation's significant Environmental Aspects3. The Organisation's technological options4. The Organisation's financial requirements5. The Organisation's operational requirements6. The Organisation's business requirements7. The views of interested parties8. Internal feedback.
3.	For every Environmental Assessment prepared the following are determined: <ol style="list-style-type: none">1. Objectives and/or targets2. Programme or timescale3. Risk to the Business4. Means of implementing/achieving objectives and targets – Required Actions5. Methods for measuring achievement of objectives and targets6. Identity of staff responsible for monitoring/measuring/overseeing implementation.
4.	In addition to objectives and targets resulting from regular environmental review, the Organisation considers other matters that affect the achievement of its environmental goals, such as training needs, investment in infrastructure, vehicle policy, internal and external communications and environmental non-conformance.
5.	As part of its commitment to continual improvement the Organisation regularly reviews its performance against the goals set.
6.	The Environmental Manager ensures that the Environmental Assessments are kept up to date and made available to the Management Team, the Certification Body and other interested parties, as evidence of the operation and effectiveness of its Environmental Management System.

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6.2	Environmental Objectives and planning to achieve them (continued)
7.	An Environmental Programme is maintained by the Environmental Manager as the working document for the actions and tasks that result from environmental assessment and other matters that contribute to the achievement of the Organisation's objectives and targets.
8.	The Environmental Programme is kept under continual review by the Environmental Manager and is revised as the actions are progressed and completed.
9.	The end of year assessment of the achievement of environmental objectives and targets, conducted by the Management Team, is a critical element of the Management Review described in Section 9.3.

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7.1	Resources
Summary of Requirements	The resources necessary for establishing, implementing, maintaining and continually improving the Environmental Management System shall be determined and provided by the Organisation.

	STATEMENT/PROCEDURE
1.	Top management ensures that, at all times, a nominated member of staff (the Environmental Manager) has responsibility for promoting environmental awareness by implementing and ultimately overseeing all aspects of the Environmental Management System.
2.	The Environmental Manager is required to report on all aspects of the performance of the Environmental Management System to top management.
3.	The identification of revised or additional resources required to implement and improve the processes of the Environmental Management System takes place as part of day-to-day management as well as part of the Management Review procedures described in Section 9.3.

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7.2	Competence
Summary of Requirements	<p>The following shall be undertaken by the Organisation:</p> <ul style="list-style-type: none">a) The necessary competence of person(s) doing work under its control that affects its environmental performance and its capacity to meet its compliance obligations shall be determinedb) The Organisation shall ensure that these persons are competent with regard to appropriate education, training, or experiencec) Training requirements related to the Organisation's Environmental Aspects and its Environmental Management System shall be determinedd) Actions shall be taken, where applicable, to ensure that staff are suitably competent, and the effectiveness of the actions taken shall be assessed by the Organisation. <p>Appropriate documented information shall be retained by the Organisation as evidence of competence.</p>
7.3	Awareness
Summary of Requirements	<p>It shall be ensured by the Organisation that persons doing work under its control are aware of the following:</p> <ul style="list-style-type: none">a) The Environmental Policyb) The significant Environmental Aspects and associated actual or potential Environmental Impacts related to their activitiesc) Their role relating to the effective operation of the Environmental Management System; this includes the advantages of improved environmental performanced) The consequences of not fulfilling Environmental Management System requirements, including not meeting the Organisation's compliance obligations.

	STATEMENT/PROCEDURE
1.	Environmental training needs are identified as a result of formal Management Review and appraisal, as detailed in Section 9.3, and the day-to-day management of the Organisation. As a result of these review activities, training programmes are established to plan and control the provision of training to meet the requirements.

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7.2 7.3	Competence (continued) Awareness (continued)
2.	All new staff are provided with environmental information as part of their induction training, emphasising the Organisation's environmental ethos and policy. The aims of ISO 14001 are explained in terms of 'continual improvement'.
3.	In addition to the above, the Organisation's Environmental Assessments are reviewed and the necessary training requirements are determined. These are included in the annual training plan.
4.	Staff training may be provided by such means as the following: <ol style="list-style-type: none">1. Environmental awareness and refresher training2. External training by an approved training provider3. Site Inductions (by Main Contractor)4. Safety/environmental Toolbox Talks (internally or by Main Contractor)5. Emergency training.
5.	Whenever a member of staff is responsible for an activity identified in an Environmental Assessment as having a significant Environmental Impact, individual training is provided in order to ensure that the individual has the necessary skills to achieve the desired outcome.
6.	As a minimum, environment specific training includes, but is not limited to: <ol style="list-style-type: none">1. The importance of the Organisation's Environmental Policy and Procedures2. Significant environmental aspects relating to specific work activities3. Roles and responsibilities in achieving conformance with the Environmental Policy and Procedures4. Potential consequences of departure from environmental procedures.
7.	Records of staff training and competence are kept in accordance with the Organisation's Quality Management procedures.
8.	In addition, copies of any environmental awareness updates sent to staff are kept as part of the Organisation's record of environmental awareness training.

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7.4	Communication
7.4.1	General
Summary of Requirements	<p>Internal and external communications relating to the Environmental Management System shall be determined by the Organisation, including the following:</p> <ul style="list-style-type: none">a) The subject of the communicationsb) When to communicatec) With whom to communicated) Manner of communications. <p>The Organisation shall do the following when setting out its communication process(es):</p> <ul style="list-style-type: none">a) Bear in mind its compliance obligationsb) Ensure that environmental information communicated reflects information generated within the Environmental Management System, and is dependable. <p>All relevant communications on the Organisation's Environmental Management System shall be acted on by the Organisation. Documented information shall be retained by the Organisation to serve as proof of communications, as appropriate.</p>
7.4.2	Internal communication
Summary of Requirements	<p>The Organisation shall undertake the following:</p> <ul style="list-style-type: none">a) Communicate information relating to the Environmental Management System internally among the various levels and functions of the Organisation, including any amendments to the Environmental Management System, as appropriateb) Ensure its communication process(es) provide conditions which help persons doing work under the Organisation's control to play a role in continual improvement.
7.4.3	External communication
Summary of Requirements	Information relating to the Environmental Management System, as set out by the Organisation's communication process(es) and as stated in its compliance obligations shall be externally communicated by the Organisation.

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7.4	Communication (continued)
STATEMENT/PROCEDURE	
INTERNAL COMMUNICATION	
1.	All staff are made aware that the Environmental Manager is the main point of contact for anyone wishing to raise environmental matters, concerns, ideas or suggestions for improvement.
2.	The main means employed for disseminating environmental information internally are as follows: <ol style="list-style-type: none">1. E-mails2. Telephone calls3. Day to day contact.
3.	Whenever practicable copies of these communications are kept by the Environmental Manager in a central folder.
4.	Prior to every Management Review all staff are invited to submit any ideas and suggestions for environmental improvement.
5.	Following the end of year Management Review feedback is provided to all staff, including an analysis of achievement of previously set environmental objectives and details of newly set environmental objectives. The Environmental Manager ensures that all staff receive clear and accurate information about issues that affect their job role and personal behaviour.
EXTERNAL COMMUNICATION	
6.	The Organisation provides information about its environmental policy, improvement initiatives and performance in pre-qualification enquiries and on its website.
7.	Whenever communications relating to an environmental matter are received from an external interested party, it is passed to the Environmental Manager in the first instance. Other members of senior management may be required to provide input to enable an appropriate response.

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7.4	Communication (continued)
8.	External interested parties may include the following: <ol style="list-style-type: none">1. Customers2. Regulatory bodies3. Enforcement agencies4. Providers and sub-contractors5. The general public.
9.	Summary details of external communication of an environmental nature are recorded on the computer based External Communications Log.
10.	The response to external communications may be verbal or in writing depending on the nature and urgency of the issue. In all instances the outcome of the communication is recorded on the External Communications Log.
11.	Records of all environmental communications are a key review topic in the Management Review. Any significant aspects resulting from staff feedback or external comments are considered when setting further environmental targets and objectives.

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7.5	Documented information
7.5.1	General
Summary of Requirements	The following shall be included in the Organisation's Environmental Management System: a) Documented information as stated by the International Standard b) Documented information determined by the Organisation as being essential for the effective operation of the Environmental Management System.

	STATEMENT/PROCEDURE
1.	The Organisation has established the documents and records that are critical to the effective operation of the Environmental Management System. These are as follows: 1. This Environmental Manual 2. Organisational Chart for Environmental Management 3. Environmental Policy 4. Environmental Assessments 5. Environmental Programme 6. Environmental guidelines 7. Health & Safety Policy and Procedures 8. Quality Management Procedures 9. Legal Compliance Register.

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7.5	Documented information (continued)
7.5.2	Creating and updating
Summary of Requirements	<p>The Organisation shall ensure the following when compiling and updating documented information:</p> <ul style="list-style-type: none">a) Appropriate identification and description (e.g. a title, date, author, or reference number)b) Appropriate format (e.g. language, software version, graphics) and media (e.g. paper, electronic)c) Appropriate review and approval for suitability and adequacy.

	STATEMENT/PROCEDURE
1.	All created and updated documented information is originated using the internal document naming convention, including the following: <ol style="list-style-type: none">1. Title2. Date3. Author's initials4. Reference number5. Version number.
2.	New document templates are approved by the Environmental Manager and entered on the held in the designated folders on the computer system, to ensure that up-to-date templates are used consistently throughout the Organisation.
3.	Where necessary, documents are approved at an appropriate level before release from the Organisation.

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7.5	Documented information (continued)
7.5.3	Control of documented information
Summary of Requirements	<p>The Organisation shall ensure the following by controlling documented information necessary to the Environmental Management System and required by the International Standard:</p> <ul style="list-style-type: none">a) Availability of such information and suitability for use, where and when it is neededb) Adequate protection of such information (e.g. from loss of confidentiality, improper use, or loss of integrity). <p>The Organisation shall address the following activities, as applicable, in order to control documented information:</p> <ul style="list-style-type: none">a) Distribution, access, retrieval and useb) Storage and preservation, including preservation of legibilityc) Control of changes (e.g. version control)d) Retention and disposition. <p>The Organisation shall identify, as appropriate, and control documented information of external origin determined by the Organisation as necessary for the planning and operation of the Environmental Management System.</p>

	STATEMENT/PROCEDURE
	ENVIRONMENTAL MANUAL
1.	The Managing Director has approved this Environmental Manual and the associated documents referred to in Section 7.5.1 and will approve all subsequent issues.
2.	The only controlled copy of the Environmental Manual is that held on the Organisation's computer system and is maintained by the Environmental Manager.
3.	All hard and any other electronic copies are by definition uncontrolled.
4.	Proposed changes to the Environmental Manual are identified during the day-to-day activities as well as more formally during the Management Review process described in Section 9.3.

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7.5	Documented information (continued)
5.	Proposed changes are reviewed and, if appropriate, adopted by the Environmental Manager after taking into account all of the relevant information.
6.	When adopted, changes are made to the controlled copy of the Environmental Manual and the appropriate personnel are notified of the change.
	OTHER CONTROLLED DOCUMENTS
7.	All other controlled documents that form part of the Environmental Management System are maintained in accordance with the Organisation's Quality Management procedures.
8.	The issue of environmental guidelines and form templates is controlled by the Environmental Manager who has responsibility for maintaining up to date information.
9.	The Organisation's Environmental Policy Statement is subject to annual review and approval by the Managing Director.
10.	Any archived copies of the Environmental Manual and associated documents are clearly identified as such and physically or electronically segregated in order to prevent their inadvertent use.
	RECORDS
11.	<p>The following records and similar documents are kept for a minimum of two years in order to demonstrate conformance to the requirements of the International Standard:</p> <ol style="list-style-type: none">1. Management Review records2. Communications of an environmental nature from, and responses to, external interested parties3. Monitoring and measurement records4. Non-conformance records5. Corrective and preventive action records6. Environmental Audit records7. Environmental Assessments.

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7 - SUPPORT

7.5	Documented information (continued)
12.	The Environmental Manager is responsible for: <ol style="list-style-type: none">1. Identifying and specifying the records that are subject to control2. Nominating individuals responsible and accountable for every record3. Specifying the contents of records (through procedures)4. Record disposal.

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8 - OPERATION

8.1	Operational planning and control
Summary of Requirements	<p>The necessary processes to meet Environmental Management System requirements and to implement the actions identified in <u>6.1</u> and <u>6.2</u> shall be set up, put into practice, controlled and maintained by the Organisation, by:</p> <ul style="list-style-type: none">a) Setting up operating criteria for the process(es)b) Putting into practice control of the process(es), in accordance with the operating criteria. <p>Planned changes shall be controlled and the effects of unintentional changes shall be reviewed by the Organisation, taking action to mitigate any adverse effects, as necessary. Control or influence of (an) outsourced process(es) shall be ensured by the Organisation. The environmental management system shall define the type and extent of control or influence to be applied to the process(es).</p> <p>The Organisation shall do the following, consistent with a life cycle perspective:</p> <ul style="list-style-type: none">a) Set up appropriate controls to ensure that its environmental requirement(s) is (are) dealt with in the design and development process for the product or service, considering each stage of its life cycleb) Determine, as appropriate, the Organisation's environmental requirement(s) for the procurement of products and servicesc) Communicate to external providers, including contractors, its related environmental requirement(s)d) Consider the requirement to make available information about possible significant environmental impacts related to the transportation or delivery, use, end-of-life treatment and final disposal of its products and services. <p>Documented information shall be maintained by the Organisation to the extent necessary in order to ensure that the process(es) has (have) been executed as planned.</p>

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8 - OPERATION

8.1	Operational planning and control (continued)
	STATEMENT/PROCEDURE
1.	<p>Operational control is maintained by the application of the following:</p> <ol style="list-style-type: none">1. This Environmental Manual2. The Organisation's Quality Procedures/Working Processes3. Environmental Assessments - Required Actions4. Environmental training5. Environmental guidelines for office, production and site personnel6. The Organisation's Health & Safety Policy7. Emergency procedures8. Posters and signage.
2.	<p>As part of initial induction and ongoing training, staff are made aware that they are responsible for reporting environmental observations and suggestions to the Environmental Manager.</p>
3.	<p>The environmental aspects of any construction project are addressed in conjunction with the safety requirements. This entails use the following, <u>as applicable</u>:</p> <ol style="list-style-type: none">1. Pre-start meetings2. Site inductions3. Site supervision4. Toolbox Talks5. Site inspection visits (e.g. small tools, plant).
4.	<p>All personnel are required to conduct themselves in an environmentally responsible way, adhering to internal guidelines and the customer's environmental procedures. This requirement is regularly reinforced as it is recognised that careless actions such as littering, pollution or contamination could undermine the Organisation's best efforts to maintain a green profile.</p>
5.	<p>The Organisation ensures that, where appropriate, its environmental requirements are addressed in the design and development process for its products or services, considering each stage of its life cycle.</p>

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8 - OPERATION

8.1	Operational planning and control (continued)
6.	The Organisation considers at every appropriate level the need to provide information about potential significant Environmental Impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.
	PROCUREMENT
7.	The Organisation has determined and documented its environmental requirement(s) for the procurement of products and services, as appropriate.
8.	Whenever it is considered relevant to the goods or services required a copy of a prospective provider's Environmental Policy is requested. In addition providers may be requested to provide details of the practical measures and initiatives employed in respect of the following: <ol style="list-style-type: none">1. Prevention and/or mitigation of all forms of pollution2. Waste management3. Recycling of materials4. Sourcing sustainable and renewable materials/products5. Environmental protection and improvement6. Environmental benefits of the products or services supplied.
9.	Providers are subject to a review of their environmental performance as part of the approval process before being appointed as approved providers. Procedures relating to the approval process and criteria for approval are as set out in the Organisation's ISO 9001 Quality Manual.
10.	The environmental requirements in the goods or services purchased by the Organisation are clearly stated at the point of order.

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8 - OPERATION

8.2	Emergency preparedness and response
Summary of Requirements	<p>The necessary processes in order to prepare for and respond to potential emergency situations identified in 6.1.1 are to be set up, put into practice and maintained.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none">a) Actions shall be planned as a means of preparing to respond, for prevention or mitigation of adverse Environmental Impacts from emergency situationsb) Actual emergency situations shall be responded toc) Measures shall be put in place for prevention or mitigation of the outcomes of emergency situations which shall be in keeping with the scale of the emergency and the potential environmental impactd) Planned response actions shall be tested periodically, where practicablee) The process(es) and planned response actions shall be reviewed and revised at intervals, especially after emergency situations or tests have occurredf) Relevant interested parties, including persons working under its control, shall be supplied with appropriate related emergency preparedness and response-related information and trainingg) Documented information shall be maintained by the Organisation to the necessary degree to ensure confidence that process(es) are executed according to plan.

	STATEMENT/PROCEDURE
1.	The potential for and response to accidents and emergency situations has been identified in the Environmental Review process described in Section 6.1.2 and recorded on a dedicated Environmental Assessment.
2.	For every type of emergency risk the Organisation has developed an appropriate response procedure.

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8 - OPERATION

8.2	Emergency preparedness and response (continued)
3.	The Organisation provides relevant information and training related to emergency preparedness and response, as appropriate, to its staff and relevant interested parties.
4.	Whenever such an emergency incident occurs details of the incident and the action taken are recorded on the Non-conformance Log.
5.	As far as is practicable the emergency procedures are periodically tested, as far as practicable, in order to ensure that the required prevention or mitigation of any adverse environmental impact is achieved.
6.	Emergency procedures are reviewed and revised following any unexpected incident having a significant environmental impact.

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation
9.1.1	General
Summary of Requirements	<p>Monitoring, measurement, analysis and evaluation of the Organisation's environmental performance shall be carried out by the Organisation and the following shall be determined:</p> <ul style="list-style-type: none">a) What requires monitoring and measuringb) In order to ensure results which are valid, monitoring, measurement, analysis and evaluation methods, as applicablec) The criteria for assessment of environmental performance, and appropriate indicatorsd) Scheduling of monitoring and measuringe) Scheduling of analysis and evaluation of results from monitoring and measurement. <p>The usage and maintenance of calibrated or verified monitoring and measurement equipment, as appropriate, shall be ensured by the Organisation.</p> <p>The environmental performance and effectiveness of the Environmental Management System shall be assessed by the Organisation.</p> <p>Information relating to the Organisation's environmental performance shall be communicated by the Organisation internally and externally, as described in its communication process(es) and in keeping with its compliance obligations.</p> <p>Appropriate documented information shall be retained by the Organisation resulting from the monitoring, measurement, analysis and evaluation data.</p>

	STATEMENT/PROCEDURE
1.	<p>The Organisation monitors, measures, analyses and improves its processes in order to:</p> <ul style="list-style-type: none">1. Demonstrate conformity of its activities2. Ensure conformity to the Environmental Management System3. Continually improve the effectiveness of the Environmental Management System.

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation (continued)
2.	Objectives and Targets are established as a result of Environmental Assessment activities. Whenever quantifiable Targets are identified and agreed, the means of monitoring and measuring their achievement is included in that section of the Environmental Assessment document.
3.	Responsibility for monitoring the level of achievement in reaching the identified Targets is assigned to a member of the Green Team. The Environmental Assessment document relating to the activity is marked with the name of the person responsible.
4.	Whenever possible, measurable data is gathered and recorded to enable the Organisation to gauge its progress against targets and to review the final outcome in its end of year Management Review.
5.	When environmental performance cannot be measured statistically the Environmental Manager ensures that selected colleagues are assigned monitoring responsibilities in their area of activity.
6.	The Environmental Manager provides top management with regular progress updates in respect of key objectives and targets.
7.	Prior to the end of each certification year all available monitoring and measurement data is collated and entered in the outcomes/achievements column in the Aspects Register. The results are analysed in the year-end Management Review. New targets and objectives set for the next year.
6.	At present the Organisation has not identified, and considers that it is unlikely to set or have imposed, any Objectives and Targets that require monitoring by fine tolerance measuring instruments.
7.	The Management Review process continuously monitors this situation. Should such requirements become applicable, the Organisation will develop, document and implement appropriate procedures by the application of the procedures set out in Section 7.1.5 (Monitoring and measuring resources).

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9 - PERFORMANCE EVALUATION

9.1	Monitoring, measurement, analysis and evaluation (continued)
9.1.2	Evaluation of compliance
Summary of Requirements	<p>The necessary processes to assess the realisation of the Organisation's compliance obligations shall be set up, put into practice and maintained by the Organisation.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none">a) The frequency of the future evaluation of compliance shall be determinedb) Compliance shall be evaluated and any necessary action shall be takenc) Knowledge and understanding of the Organisation's compliance status shall be maintained. <p>Documented information shall be kept by the Organisation as evidence of data resulting from the compliance evaluation.</p>

	STATEMENT/PROCEDURE
1.	The Environmental Manager ensures that a review of the Organisation's obligations is carried out at regular intervals and that appropriate records are maintained. Such reviews normally precede the six-monthly Management Reviews.
2.	Each Management Review includes a review of all significant findings identified during such compliance reviews and determination of any appropriate actions which need to be taken.

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9 - PERFORMANCE EVALUATION

9.2	Internal audit
9.2.1	General
Summary of Requirements	<p>Internal audits shall be carried out periodically to communicate whether the Environmental Management System:</p> <p>a) Is consistent with:</p> <ul style="list-style-type: none">a. The Organisation's own obligations for its Environmental Management Systemb. The requirements detailed by the International Standard. <p>b) Is put into practice and maintained successfully.</p>
9.2.2	Internal audit programme
Summary of Requirements	<p>An internal Audit Programme(s), including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits shall be put into practice and maintained.</p> <p>The Organisation shall consider the environmental significance of the processes involved, changes affecting the Organisation and the results of previous audits when setting up the internal audit programme.</p> <p>The following shall be carried out by the Organisation:</p> <ul style="list-style-type: none">a) The audit criteria and scope shall be defined for each auditb) Auditors shall be assigned and audits conducted to ensure objectivity and that the audit process remains impartialc) It should be ensured that relevant management are made aware of the results of the audits. <p>Documented information serving as evidence of the implementation of the Audit Programme and audit results shall be kept by the Organisation.</p>

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9 - PERFORMANCE EVALUATION

9.2	Internal audit (continued)
STATEMENT/PROCEDURE	
1.	<p>There are up-to-date procedures and a programme to check (audit) that the Environmental Management System:</p> <ol style="list-style-type: none">1. Reflects the Organisation's requirements for environmental management2. Reflects the requirements of the International Standard3. Is being properly operated and maintained up to date.
2.	The results of all Environmental Audits are passed to management.
3.	<p>The Environmental Audit Programme reflects the:</p> <ol style="list-style-type: none">1. Environmental importance of the activity concerned2. Results of previous Environmental Audits.
4.	<p>Environmental Audit procedures address:</p> <ol style="list-style-type: none">1. The audit scope2. Audit frequency3. Audit methodologies4. Responsibilities and requirements for conducting audits and reporting results.
5.	An Environmental Audit Programme is maintained by the Environmental Manager ensuring that every Section of the Environmental Management System is verified at least annually.
6.	More frequent Environmental Audits may be organised by the Environmental Manager depending on the importance of the activities being audited.
7.	Internal Environmental Audits are carried out according to the following procedures:
8.	At the beginning of every month, the Environmental Manager consults the Environmental Audit Programme and establishes which, if any, parts of the Environmental Management System are to be audited during the coming month.

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9 - PERFORMANCE EVALUATION

9.2	Internal audit (continued)
9.	A member of staff, whenever possible independent of the activity to be audited, is appointed by the Environmental Manager.
10.	The Auditor refers to this Manual and determines the activities to be audited.
11.	The Auditor selects a representative number of records to be audited on a random basis.
12.	The Auditor advises any personnel concerned that an Environmental Audit is being undertaken and answers any questions they may have regarding the audit.
13.	The Auditor examines the records selected in order to determine whether the activities identified above have been carried out correctly.
14.	Objectives, Targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy.
15.	The Environmental Audit Record and all other documents relating to internal audits are passed to the Environmental Manager.
16.	The Environmental Audit Record and all other documents relating to internal Environmental Audits are retained for inspection by QMS International at the annual external Environmental Audit.
17.	All issues arising from the internal Environmental Audit requiring immediate attention are discussed with the appropriate personnel and a record is kept on an Environmental Audit Report or Management Information Report as appropriate.
18.	The Environmental Manager ensures that the Environmental Audit results are discussed at the next Management Review.

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9 - PERFORMANCE EVALUATION

9.3	Management Review
Summary of Requirements	The Organisation's Environmental Management System shall be reviewed by top management at planned intervals to ensure its ongoing suitability, adequacy and effectiveness.

	STATEMENT/PROCEDURE
1.	An Environmental Management Review is carried out at not greater than 6-monthly intervals. If appropriate, a corrective action plan is formulated.
2.	Environmental Management Review meetings may be held as a component of other Management System Reviews.
3.	<p>Specific items included on the agenda of every Management Review are:</p> <ol style="list-style-type: none">1. The status of actions from previous Management Reviews2. Changes in external and internal issues that are relevant to the Environmental Management System3. Changes in the needs and expectations of interested parties, including compliance obligations4. Changes in the Organisation's significant Environmental Aspects5. Changes in risk and opportunities6. The extent to which Environmental Objectives have been achieved7. Information on the Organisation's environmental performance, including trends in:<ol style="list-style-type: none">a) Non-conformities and corrective actionsb) Monitoring and measurement resultsc) Fulfilment of compliance obligationsd) Audit results.8. Adequacy of resources9. Relevant communications from interested parties, including complaints10. Opportunities for continual improvement and related decisions

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9 - PERFORMANCE EVALUATION

9.3	Management Review (continued)
3./ continued	<ul style="list-style-type: none">11. Conclusions on the continuing suitability, adequacy and effectiveness of the Environmental Management System12. Decisions related to any need for changes to the Environmental Management System, including resources13. Actions, if needed, when Environmental Objectives have not been achieved14. Opportunities to improve integration of the Environmental Management System with other business processes, if needed15. Any implications for the strategic direction of the Organisation.
4.	Records of the findings of the Management Review and any planned action are kept for a minimum period of two years as part of the Organisation's environmental record system.
5.	A detailed record is kept of the proceedings of the Management Review and the record and/or appropriate extracts thereof are circulated to all appropriate members of the Organisation.

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10 - IMPROVEMENT

10.1	General
Summary of Requirements	Opportunities for improvement shall be determined by the Organisation (see 9.1, 9.2 and 9.3) and any required actions to realise the intended outcomes of its Environmental Management System shall be put into practice.

	STATEMENT/PROCEDURE
1.	<p>The effectiveness of the Environmental Management System is continually reviewed and improved through the Management Review process set out in Section 9.3 and by:</p> <ol style="list-style-type: none">1. The application of the Environmental Policy2. The application of the Environmental Objectives3. Environmental Audits4. Analysis of data5. Corrective actions6. The evaluation and treatment of risks and opportunities7. Circulation of Management Review Minutes.

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ENVIRONMENTAL MANUAL

10 - IMPROVEMENT

10.2	Non-conformity and corrective action
Summary of Requirements	<p>The Organisation shall do the following in the event of a non-conformity, including any arising from complaints:</p> <ul style="list-style-type: none">a) Respond to the non-conformity and, as applicable:<ul style="list-style-type: none">a. Control and correct it by taking necessary actionb. Handle the outcomes, including lessening adverse Environmental Impacts.b) Consider necessary action to eradicate the origins of the non-conformity, to ensure it does not recur or occur elsewhere, through:<ul style="list-style-type: none">a. Review of the non-conformityb. Ascertaining the origins of the non-conformityc. Determining if there are already similar non-conformities in existence, or whether these could potentially come about.c) Put any necessary actions into practiced) The effectiveness of any corrective action taken shall be reviewede) Changes to the Environmental Management System shall be made, if necessary. <p>Corrective actions shall be appropriate to the effects of any non-conformities discovered, including the Environmental Impact(s).</p> <p>Documented information shall be retained by the Organisation as evidence of:</p> <ul style="list-style-type: none">a) The nature of the non-conformities and any actions taken to correct theseb) The consequences of any corrective action.

	STATEMENT/PROCEDURE
1.	Non-conformances relating to the Environmental Management System are brought to the attention of the Environmental Manager.
2.	The scope of the non-conformance procedure includes: <ol style="list-style-type: none">1. Office and site-based activities (e.g. incorrect waste separation, spills, harm to flora/fauna)2. Customer raised environmental issues3. Provider related issues.

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ENVIRONMENTAL MANUAL

10 - IMPROVEMENT

10.2	Non-conformity and corrective action (continued)
3.	Every significant non-conformance is investigated by the Environmental Manager in order to identify its cause.
4.	Details of the non-conformance are immediately entered on the Non-conformance Log.
5.	An investigation is undertaken to determine the cause of the non-conformance. All necessary resources are employed to minimise harm caused to the environment.
6.	Corrective action is taken to mitigate the consequence of each non-conformance and recorded on the Non-conformance Log.
7.	Corrective action may involve retraining, revised procedures or revision of the Environmental Manual. Any significant or long term actions are entered on the Environmental Programme and monitored pending an acceptable outcome.

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ENVIRONMENTAL MANUAL

10 - IMPROVEMENT

10.3	Continual improvement
Summary of Requirements	Improvement of the suitability, adequacy and effectiveness of the Organisation's Environmental Management System is to be continual. The results of analysis and evaluation, and the outputs resulting from Management Review shall be considered by the Organisation in order to determine whether there are any existing needs or opportunities that continual improvement may attend to.

	STATEMENT/PROCEDURE
1.	The Organisation ensures continual improvement of the suitability, adequacy and effectiveness of the Environmental Management System by application of the procedures documented in Sections 10.1 and 10.2.