

SPECTRUM PRINTING	Section OV04
ENVIRONMENTAL SYSTEM MANUAL	Page 1
	Issue A
	Date 16-12-14

SCOPE AND CONFIDENTIALITY

This document defines SPECTRUM PRINTING environmental policy and procedures and is for circulation within the Company and those on the distribution sheets only. It is the gateway document between the ISO 14000:2004 and Spectrum Printing Environmental system.

To fulfill the requirements of ISO 14000:2004 the Environmental Management System covers all environmental aspects consistent with the Environmental Policy, i.e. noise, energy use, manufacturing activities and general waste disposal including the removal of empty drums, pallets, hazardous substances, gases and general waste.

Emergency procedures are in place and by the use of internal audits and Management Reviews the system is maintained.

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Lorraine Cronin

LORRAINE CRONIN
ENVIRONMENTAL MANAGER

CONTENTS OF THIS MANUAL

PAGE	ITEM	ISSUE
1	Confidentiality	A
2	Contents List	A
3	About this Manual Company Background Description of Activities	A
4	Environmental Policy Statement	A
5	Planning, Environmental Aspects, Legal and other Requirements, Objectives and Targets Environmental Management Programme	A
6	Structure	A
7	Responsibilities and Authority	A
8	Training, Awareness and Competence Communication Environmental Management System Documentation.	A
9	Document Control, Operational Control Emergency preparedness and Response Checking and Corrective Action Monitoring and Measurement	A
10	Nonconformance and Corrective and Preventive Action Records	A
11	Environmental Management System Audit Management Review	A

SPECTRUM PRINTING

ENVIRONMENTAL SYSTEM MANUAL

Section OV04

Page 3

Issue A

16-12-14

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ABOUT THIS MANUAL

The object of this Environmental Manual is to make known the policies of the company with regard to the control and development of its printing and associated processes in the context of current environmental regulations and the legitimate interests of the community in which we work, and to describe how these policies are implemented.

The procedures described within this manual will be subject to regular management review, and every effort will be made to ensure that it reflects current working practices.

Although subject to review, it is not possible to ensure that this manual will cover all possible activities and contingencies. It is therefore published with the confidence that the performance of its employees will be dedicated to the highest quality of environmental management within its manufacturing operations, and to maintaining the good name of the Spectrum Printing.

This manual is a controlled document and may be viewed at our premises and will not be issued to third parties.

ACKNOWLEDGEMENTS

The initial Environmental consultancy was taken up with Magnum QA Environmental Protection Team who determined our environmental protection needs. They provided procedural advice as well as legal and other environmental data and reviewed our environmental audit reports. The Environmental Manual and associated procedures were structured, raised and audited with the assistance of Magnum QA Services.

COMPANY BACKGROUND

The business of Spectrum Printing was established in 19xxxx The company was located at xxxxx until the move to the present premises in 19xxxx The company currently employs some fifteen skilled and semi-skilled printing operatives supported by the professional printing services of the Proprietor.

DESCRIPTION OF ACTIVITIES

The company is engaged in the provision of lithographic printing including all methods of binding and finishing for a variety of commercial, industrial, leisure and government clients. The company achieved NQA certification to ISO 9002 in January 1998 and subsequent transition to 9001:2000 with URS. A number of environmental matters are automatically included in the Quality Management System.

The company relies on trade magazines and the Environmental Helpline to stay abreast of the latest environmental legislation.

ENVIRONMENTAL POLICY STATEMENT**ISO 14001:2004**

It is the established policy of Spectrum Printing, to provide lithographic printing including all methods of binding and finishing and, within our remit prevent pollution wherever possible within our environmental scope. Also, to continually improve our methods of printing and associated processes to reduce pollution and waste to satisfy the full requirements of our legal and moral obligations to defined bodies and the general public.

We commit ourselves to this policy by the implementation of a documented Environmental Management System that is maintained by trained personnel who can demonstrate efficiency and control in all matters relating to the environment. Regular internal auditing and management reviews ensure a framework for setting and reviewing environmental objectives and targets.

The Environmental Policy is mandatory for all company staff and a source of reference to others. The policy is available to all interested parties and copies are posted on company notice boards to ensure the environmental policy and objectives are communicated to all levels in the organisation.

Sustainability of the Environmental System

Sustainability of the system is maintained by carrying out regular environmental audits followed by Environmental Management Reviews with actions, actionees and targets identified. Also, we invest in the most energy efficient plant and equipment using skilled and competent personnel supported by suitable environmental training. Recycling of waste wherever possible also ensures sustainability of the environment

Environmental Management Representative

The Environmental Manager has been delegated to execute, co-ordinate, supervise and control the Environmental Management System irrespective of her other duties. She does this by audits, management reviews and using document control procedures. She is also prime signatory to the Environmental Management System and associated documents and has authority to stop non complying activities. The Environmental Manager is assisted and supported by the Proprietor. Spectrum Printing welcome enquiries from environmentally associated public, private and legal representatives and our offices and printing works are open, and the Environmental Management System documents available for the purpose of external environmental control surveillance.

The environmental system is aimed at supporting the above policy and is structured to meet the requirements of ISO 14001:2004.



LAWRENCE CORRIA
PROPRIETOR

PLANNING

(ISO 14001:2004, 4.3)

Environmental Aspects (4.3.1) (OV05 - EN02)

It is the Company's responsibility to establish and maintain a procedure to identify the environmental aspects in order to determine those which have or can have significant impacts on the environment. This information is kept up-to-date by continual monitoring and will be reviewed when new or modified activities impact on the environment including new products or methods which it can influence.

The Register of Aspects states clearly those activities which have a significant impact on the environment. Significant impacts are taken into account with regard to environmental objectives.

Legal and Other Requirements (4.3.2) (OV06 - EN03)

The Company has established and maintains a procedure that identifies and has access to legal and other requirements applicable to the environmental aspects.

The Register of Legislation is maintained in order to identify areas where compliance is a legal requirement.

Objectives and Targets (4.3.3) (OV07)

The Company reviews its objectives and targets for consideration of legal and other requirements, the significant environmental aspects, its technological options and its financial, operational and business requirements, and the views of interested parties.

The objectives and targets are documented and consistent with the environmental policy of the company and its commitment to continual improvement and the prevention of pollution and this is communicated to all staff.

Environmental Management Programme (4.3.4) (OV07 - EN04)

The Company ensures that the environmental objective and targets are achieved through the environmental management programme which consists of the following :-

- *How the targets are achieved
- *The time scale for completion
- *The personnel responsible for implementing the programme

For any new developments or activities the environmental aspect will be documented and additional or amended programme will be created where necessary.

IMPLEMENTATION AND OPERATION STRUCTURE

ISO 14001:2004, 4.4

PROPRIETOR

QUALITY/ENVIRONMENTAL MANAGER

Financial Affairs

Technical Authority

Environmental Control

Quality Systems Control

Estimating/Quotations

Purchasing/Planning

ADMINISTRATION

Wages

General Administration

Accounts

FOREMAN

Supervision

Environment Matters

Work Scheduling

Printing &
Final Inspection

Despatch

GENERAL MACHINISTS

Production and Packaging

RESPONSIBILITIES AND AUTHORITY

(ISO 14001:2004, 4.4)

Proprietor

The Proprietor along with the Environmental Manager is responsible for all environmental matters concerning the company. The Proprietor is committed to the full implementation and maintenance of ISO 14001:2004. The Quality Manager carries the additional title of Environmental Manager. The Environmental Manager ensures the availability of the Proprietor who deposes in her absence on environmental matters. Further contingencies are made by following down through the organisation chart.

Environmental Manager

The Environmental Manager is responsible for the implementation, maintenance and auditing of the Environmental System as outlined in this manual. She ensures the latest legislation is understood by all employees of the company and liaises with outside bodies and ensures environmental records are suitable and retained for the specific periods.

Auditing

The Environmental Manager is also responsible for raising and maintaining environmental auditing programmes, appointing trained and competent auditors and responding to their reports.

Foreman The Foreman is responsible to the Environmental Manager for the maintenance of environmental concerns that affect his area of operation and he reports environmental discrepancies and maintains records of these matters using the Internal Rejection System. He may depute in the absence of the Environmental Manager and Proprietor.

Operatives

Operatives have received Environmental Awareness instructions and are responsible for minimising any polluting activities within the requirements of ISO 14001:2004, company procedures, guidelines and current legislation.

Training, Awareness and Competence (4.4.2) (EC05)

The Company ensures that training needs are identified and relevant training plans are drawn up. Employees are made aware of the potential consequences of departure from procedures resulting in non-compliance. All personnel working on or behalf of the company are required to be qualified and contractors and occasional visitors performing tasks must be made aware of environmental factors and potential risks and the importance of complying with the environmental policy, procedures and with the requirements of the environmental management system (see visitors pass).

All employees are also made aware of their role and responsibilities and have been provided with training appropriate to the activities performed. All personnel whose work has the potential to create a significant impact on the environment will receive appropriate training. Competent personnel are assigned to specific tasks and selected on the basis of their education, training and experience.

Communication (4.4.3) (EN05)

A communication system is in place for receiving, documenting and responding to relevant communications from external parties, and for internal communication between the various functions of the organisation.

The Company has documented procedures for communication with the authorities regarding emergency planning. The environmental policy as required by ISO 14001:2004 is displayed on site and is available on request to interested parties.

Environmental Management System Documentation (4.4.4) (PARTS 1-2-3)

The Company's Environmental Management System for ISO 14001:2004, is defined in the following documents:

- Environmental Systems Manual (this document)
- Environmental Procedures
- Register of Aspects and Legislation and the Environmental Management Programme
- Environmental Records

The above documents provide direction to other related documents. The responsibilities for their continued and effective implementation are defined within this Manual and Environmental Procedures.

The Environmental Systems Manual defines the Company's policy towards environmental management and as such the section numbers of the manual are aligned to the relevant sub-sections of ISO 14001:2004.

The environmental procedures provide detailed explanations of how this policy is implemented and the procedure numbers correspond to relevant section numbers in the environmental manual.

Document Control (4.4.5) (EC03)

Current versions of relevant documents comprising Parts 1, 2 and 3 and other data are available at all locations where operations relating the environmental management system are performed.

All documents are controlled and periodically reviewed by qualified, competent personnel as identified in the procedures, and issued to a defined curriculum list. These nominated persons have the ability and authority to approve such information before formally issuing it, involving the approval of others if necessary. Obsolete information is withdrawn and destroyed or, if required, for reference clearly marked obsolete to prevent inadvertent use.

Changes or modifications are authorised by appropriate individuals prior to issue. Whenever possible, new issues of information state the nature of the change and are approved by the person(s) that performed the original review. Individuals controlling the issues ensure that all holders have up to date information.

Operational Control (4.4.6) (EN06 - EN09)

The Company has identified those operations and activities associated with its significant environmental aspects. The company organises these activities, including maintenance, in order to ensure that they are carried out under specified conditions by:-

*Establishing and maintaining documented procedures to cover situations where their absence could lead to non-compliance from the environmental policy and the objectives and targets.

*Stipulating operating criteria in the procedures.

*Communicating relevant procedures and requirements to contractors, subcontractors and suppliers as relevant.

Emergency Preparedness and Response (4.4.7) (EN07)

The Company is responsible for ensuring that procedures are established and maintained to identify potential accident and emergency situations, which may result in a significant environmental impact.

The Company continually reviews and where necessary revises its emergency preparedness and response procedures, particularly when any accidents or emergencies have occurred.

The Company periodically tests the procedures by simulating one of these events.

CHECKING AND CORRECTIVE ACTION (4.5)**Monitoring and Measurement** (4.5.1) (EN08)

Key characteristics of the operations and activities are continually monitored and measured to provide the Company with feedback on environmental performance. Information is documented, operational controls implemented and conformance with the objectives and target pursued.

Monitoring equipment calibrated to national standards ensures that the equipment remains accurate. Calibration results are recorded and monitored to indicate appropriate changes to calibration periods thus alerting the Company when it becomes necessary to repair or replace the equipment. A log listing all such equipment, calibration dates, results and acceptable criteria is maintained.

Legislative compliance is monitored periodically through the procedures.

Non-conformance and Corrective and Preventive Action (4.5.2) (EC04)

All non conformances in relation to environmental issues are reported to the Environmental Manager, who is responsibility and authorised to investigate non conformances and the completion of corrective and preventive action.

As soon as a non conformity has been identified the corrective action procedure is initiated. Emphasis is placed on action to prevent recurrence of the nonconformity. We monitor to ensure the effective and timely implementation of corrective actions. The Environment Manager implements and records changes to the documented procedures.

Non conformances and corrective actions are recorded and reported at the Management Review meetings.

Records (4.5.3) (EC03)

Records of environmental related occurrences provide two crucial aspects of the Environmental System.

*Proof that the Environmental Procedures are being followed.

*Information which, when analysed, will detect trends and may be used for implementing corrective and preventive action.

Environmental records include training records and the results of system audits and Management Reviews. The record descriptions are listed within the procedure together with the location, person responsible for maintaining the records and the retention period. Records are legible, identifiable and traceable to the activity and stored to ensure preservation and readily retrievable for reference purposes.

All records are kept for at least two years. If the requirements of specific contracts require records to be kept for a longer period then the contractual requirements take precedence.

Storage methods ensure that records are kept:

- a) In a way that allows easy retrieval and the analysis of trends where applicable
- b) Safe from deterioration
- c) By defined personnel
- d) For pre-determined periods

Environmental Management System Audit (4.5.4) (EC04)

In order that the environmental management system continues to be fully practiced and developed within the Company and to determine conformance with EMS criteria every environmental process procedure and section of this manual is regularly audited by competent Company personnel. An audit team exists to execute this function.

A programme of audits is raised annually with some procedures audited more frequently than others according to the nature and importance of the environmental impact.

Audits carried out on the behalf of the Environmental Manager which involves personnel outside of the Environmental Section are verified by personnel not directly involved in them.

An environmental Audit Record is made for each audit undertaken. Non compliances are noted on the record and corrective and preventive action agreed. It is the responsibility of the Environmental Manager to instigate these actions. The nature of the solution and its target implementation date are recorded. The Environmental Manager monitors the timely and effective implementation of such actions.

Personnel responsible for system auditing are trained and competent to carry out this task which is performed in accordance with a defined procedure.

Internal audits are subject to Management Review.

Management Review (4.6) (EC02)

The Company management team annually reviews the Environmental Management System to ensure its continuing suitability, adequacy and effectiveness for the requirements of ISO 14001:2004. As part of the review, the contents of this Environmental Management System are reviewed in their entirety and, where required, revised. Specifically, Management Reviews consider:

- Environmental Policy
- Environmental objectives and targets
- Internal audits – non conformances and corrective actions
- Legislative changes
- Communications received
- Site or process changes – resulting in new environmental impacts
- Future plans for the company – effect on the environmental management system
- Training

Minutes of management review meetings are retained as environmental records.

SPECTRUM PRINTING

ENVIRONMENTAL SYSTEM MANUAL

Section OV04

Page 12

Issue A

16-12-14

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