Appendix O:
Environment
Management System

Environmental Management System 2015

REVISION:

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DISTRIBUTION: Access Recycling – Central File Head Office, Barmedman, Bomen, Fyshwick, Artarmon, Field sites

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1. INTRODUCTION

This Environmental Management System (EMS) describes how an action might impact on the natural environment in which it occurs and set out clear commitments from the person taking the action on how those impacts will be avoided, minimised and managed so that they are environmentally acceptable.

This EMS is designed to meet the requirements of the Environmental Legislation and related Codes of Practices.

This EMS will be made available to all workers and contractors on each work site and all workers must be able to have the opportunity to read, understand, clarify and ask questions

A copy of this EMS is readily available.

This document and any revisions will be made available for auditing.

1.2. EMS Authorisation and Control

1.2.1. Authorisation

This EMS is authorised by the Access Recycling Director.
All Access Recycling personnel are to ensure that their work activities are carried out in accordance with the requirements of this EMS.

1.1.2. Revision & Distribution

This EMS is a controlled document and a record of its controlled distribution and revision must be kept up-to-date by the Chief Operating Officer.

The records will be kept with Environmental documents and maintained on the Access Recycling database maintained on the Server.

Controlled copy holders are responsible for maintaining their copies up-to-date.

1.1.3. Review

The Chief Operating Officer must monitor the implementation of the EMS and review the need for change or improvements having due regard to matters such as:

- Site Manager comments, change in work scope, etc;
- internal and external audits;
- Site personnel suggestions & comments;
- Incidence and frequency of non-conformance or corrective/preventive action.

All changes must be formally approved by the Access Recycling Director.

2. GLOSSARY

Most of the following definitions are adapted from AS/NZS ISO 14001:2004 and other standards. The terms are defined in the context of an environmental management system.

Audit: systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled

Competence: demonstrated personal attributes and demonstrated ability to apply knowledge and skills

Compliance: *AS 3806:2006:* adhering to the requirements of laws, industry and organisational standards and codes, principles of good governance and accepted community and ethical standards

AS/NZS ISO 14001:2004: adhering to legal or other requirement

Conformity: fulfilment of a specification or requirement; synonymous with *conformance* which has been deprecated by ISO

Continual improvement: recurring process of enhancing the environmental management system to achieve improvements in overall environmental performance consistent with the organisation's environmental policy

Document: information and its supporting medium

Documentation: a set of documents, e.g. procedures and records

Effectiveness: extent to which planned activities are realized and planned results achieved

Efficiency: relationship between the result achieved and the resources used

Environment: surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation

Environmental impact: any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects

Environmental management system: part of an organisation's management system used to develop and implement its environmental policy and manage its environmental aspects; often abbreviated to *EMS*

Environmental objective: overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve

Environmental policy: overall intentions and direction of an organisation related to its environmental performance as formally expressed by top management

Evaluation: systematic determination of merit, worth and significance of something using criteria, e.g. evaluation of effectiveness

Internal audit: audit conducted by, or on behalf of, an organisation itself for management review and other internal purposes

ISO: International Organization for Standardisation, but abbreviated to ISO (from the Greek *isos* which means *equal*)

JAS-ANZ: Joint Accreditation System of Australia and New Zealand, accredits conformity assessment bodies

Legal requirement: requirement of legislation, a regulation, a licence, a permit, or a contract

Management review: holistic and strategic determination by top management of the suitability, adequacy and effectiveness of an environmental management system to fulfil commitments made in the environmental policy and achieve the established environmental objectives

Manual: document specifying the requirements of an environmental management system

Prevention of pollution: use of processes, 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; can include source reduction or elimination, process, product or service changes, efficient use of resources, material and energy substitution, reuse, recovery, recycling, reclamation and treatment

Preventive action: action to eliminate the cause of a potential nonconformity in order to avoid occurrence of the nonconformity

Procedure: specified way to carry out an activity or a process

Program: a planned set of tasks to achieve environmental objectives and targets, specifying responsibility, means and timeframe; also spelt *programme*; also referred to as *action plan* or *environmental improvement program*

Process: set of interrelated or interacting activities which transforms inputs into outputs

Record: document stating results achieved or providing evidence of activities performed

Requirement: need or expectation that is stated, generally implied or obligatory

Responsibility: accountability for something within one's power, control or management

Risk: a measure of the likelihood and consequences of an event that will impact on achievement of objectives; can be adverse or beneficial

Risk analysis: systematic process to understand the nature of and to deduce the level of risk; provides the basis for risk evaluation and the treatment of risk

Risk assessment: overall process of identifying risks, risk analysis, and risk evaluation

Risk evaluation: process of comparing the level of risk against risk criteria, e.g. the process used in determining significant environmental aspects

Risk management: the culture, processes and structures that are directed towards realising potential opportunities whilst managing adverse effects

Scope: boundaries of an environmental management system in terms of location, activities, products and services

Standard: a set of requirements for a management system, e.g. AS/NZS ISO 14001:2004

3. RELATED PLANS/PROCEDURES

This Plan should be read in conjunction with the following:

- Access Recycling- Risk Assessments conducted at each work site
- Access Recycling Environmental Management Plan
- Safe Work Method Statement (SWMS) – relevant to each work site
- Site Emergency Procedures

4. REFERENCES

The following documents were referenced in the development of this Plan:

- Protection of the Environment Operations Act 1997 (NSW)
- Waste Avoidance and Resource Recovery Act 2014 (NSW)
- ISO 14001—Environmental management systems—Requirements with guidance for use
- ISO 14004—Environmental management systems—General guidelines on principles, systems and support techniques

5. ENVIRONMENTAL RISKS

In relation to the handling of scrap for processing and disposal, the key environmental risks associated with the works are derived from the following environmental aspects:

- Emissions to air
- Spillage of hazardous and non-hazardous materials
- Waste
- Consumption of natural resources
- Bushfires
- Sensitive receivers in particular disturbances causing:
    - Noise or vibration
    - Damage to heritage listed stations and associated buildings
    - Damage to archaeologically sensitive areas at creeks
- Biodiversity in particular disturbances to:
    - Water crossings
    - Weed invasion and/or noxious weeds

6. ENVIRONMENTAL OBJECTIVES AND TARGETS

The objectives of this EMS are:

- To provide personnel involved in work activities with a clear, concise and practical environmental management plan.
- To use, as much as possible, visual representations for environmental management.
- To minimise documentation and duplication.
- To enable the processing and disposal of redundant rail locomotives in an environmentally responsible manner.
- To identify and detail monitoring requirements associated with processing and removal of redundant rail locomotives.
- To identify environmental management responsibilities and management structure.
- To present the regulatory framework within which the works occur.

7. ENVIRONMENTAL MANAGEMENT RESPONSIBILITIES

All employees have a responsibility for the effective and ongoing management of environmental impacts within all facets of the work site.

7.1. Roles and Responsibilities

All employees shall receive suitable environmental induction and training to ensure that they are aware of their responsibilities and are competent to carry out the work. Environmental requirements will be explained to employees during the site induction and on-going training via tool box meetings, briefings and notifications. All employees shall receive induction/ training in the following:

- The work site induction will outline environmental risks and control strategies
- All employees must be made aware of the contents of the Environmental Policy.

7.1.1. Environmental Representative

The Site Managers will be responsible for:

- Giving environmental inductions to staff and contractors.
- Implementing this EMS and any other environmental management documents prepared for the work site.
- Undertaking the monitoring and reporting requirements of this EMS, including the weekly environmental inspections.
- Communicating with the Chief Operating Officer and other relevant personnel as required.
- Responding to and reporting any environmental incidents.

7.1.2. Organisation, Accountability, Responsibility and Authority

An organisation chart for Access Recycling is provided in *Figure 2.* The ultimate responsibility to ensure the EMS is implemented is that of the Chief Operating Officer.

Access Recycling shall appoint an Environmental Representative for the work sites who will be responsible for communications relating to environmental performance.

All site personnel are required to be fully inducted and trained in the requirements of this EMS by the Site Manager.

Site staff has responsibilities and authorities in relation to environmental management including:

- The right and authority to stop work or refuse to work in a situation that may cause environmental harm.
- Duties and responsibilities to prevent pollution.
- Obligations to respond to environmental incidents, including their prevention, clean up and reporting.

In addition to the above, Access Recycling will:

- Comply with all applicable environmental legislation.
- Report promptly to the relevant Environmental Authority of any serious/reportable environmental incident.
- Ensure employees, contractors and sub-contractors comply with applicable legislation.
- Be duly diligent in environmental management of all activities.

Access Trading Management Structure April 2015

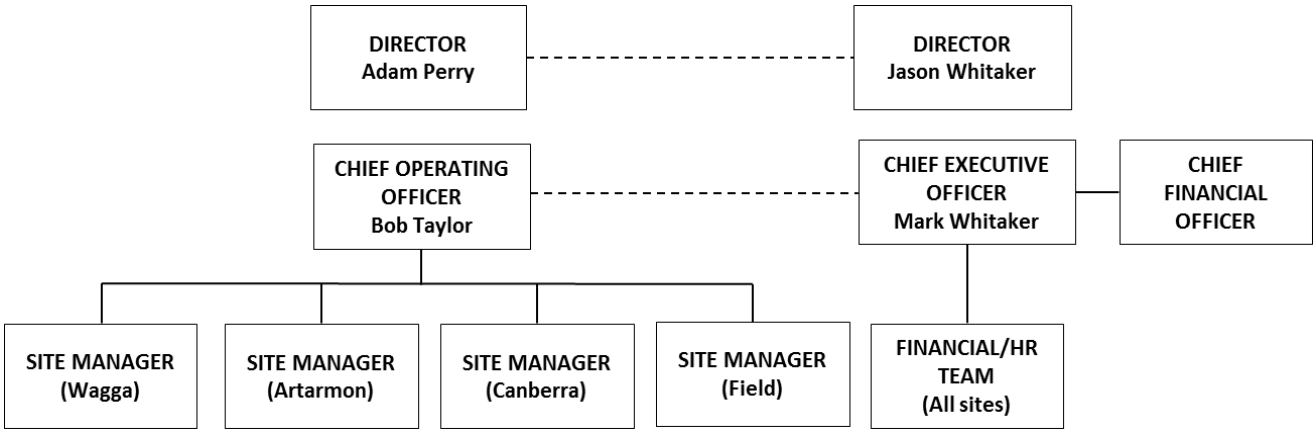


Figure 2 Access Recycling Management Structure April 2015

8. ENVIRONMENTAL POLICY & COMMITMENT

Access Recycling's Environmental Policy is reproduced below.

Copies of this Policy must be displayed on-site in prominent locations and its content must be explained to employees during site inductions.

Environmental Policy

Access Recycling mission is to be a successful diversified company, aggressively pursuing opportunity and innovation to optimise return. To accomplish this mission, this policy has been endorsed by management to ensure that environmental considerations are a fundamental part of our operational activity.

Access Recycling is committed to being both a responsible corporate citizen and a fair and ethical company. Our objectives include conducting our business in ways to minimise the impact on the environment.

In fulfilling these objectives, Access Recycling will:

- Meet, and where appropriate, exceed the requirements of all environmental laws and standards, and where no regulations exist, Access Recycling will adopt the appropriate standard.
- Co-operate with the public and government organisations in seeking solutions and participate in responsible discussion of environmental concerns.
- Minimise the environmental impact of our operation and the discharge of waste materials by utilising responsible pollution control and waste minimisation practices.
- Continually assess the application of appropriate innovative technology that has the potential to improve our environmental performance.
- Promote environmental awareness in training programs amongst all our employees and contractors.
- ❖ Monitor our performance with a view to continual improvement.

Acceptance of these responsibilities by all parties and the development of a team attitude to safety and training are essential for the development and maintenance of a safe and healthy working environment.

This policy will be reviewed through consultation every two years or sooner as the need arises to ensure its effectiveness.

Managing Director Employee Representative July 2014

\\SERVER-DC\Main Directory\Health, Safety & Environment\Policies\Word Doc - Restricted Users\Environmental Policy_Rev 1_2014.doc

9. TRAINING AND AWARENESS

Access Recycling will provide all staff involved with the works with appropriate training related to the environment aspects at their work site. These responsibilities include coordinating environmental training, maintaining training records and assessing the effectiveness of training. All site staff will be appropriately qualified and trained for the specific role they are to undertake. If training is required for any site staff, this training would be completed prior to the commencement of work. Training requirements have been identified below for internal training.

Personnel requiring training	Training requirement	Type	Schedule and timing of training
All permanent staff	Environmental Awareness	Induction	At commencement of project/work
All	Emergency Contingency Control Plan	Covered in induction.	Prior to commencement of project/work

9.1. Environmental Induction

Environmental Induction will be integrated into the site induction. The Environmental Induction will as a minimum include:

1. An outline of the EMS structure.
2. The roles and responsibilities of staff in relation to environmental management.
3. An outline of the environmental Incident Management Procedure.
4. Access Recycling Environmental Policy.
5. Understanding individual authorities and responsibilities.
6. Site environmental rules and location of sensitive areas.

9.2. Pre-work and tool box talks

A Pre-Work brief will be held at the commencement of each day, or at the commencement of new activities. The aim of the pre-work briefs is to identify the specific proposed work activities that are scheduled for that day. Reference should be made to this EMS during the pre-work briefs, in particular waterway crossings, native vegetation, significant weeds and any heritage items.

Tool box talks would be held on a regular basis involving all site personnel. The objective of the Tool box meetings is to discuss the coming weeks proposed activities, potential issues or, any non-compliances identified during the previous weeks would also be discussed with the aim to reduce the potential of the same non-compliance reoccurring.

10. COMPLAINTS MANAGEMENT

Complaints may be received through the following channels:

- Received directly by site staff
- Received through the public number
- Received via the website / email
- Received via the post
- Received by other work site staff

Any complaint is to be recorded as an incident and managed in accordance with the complaints management procedure as detailed below:

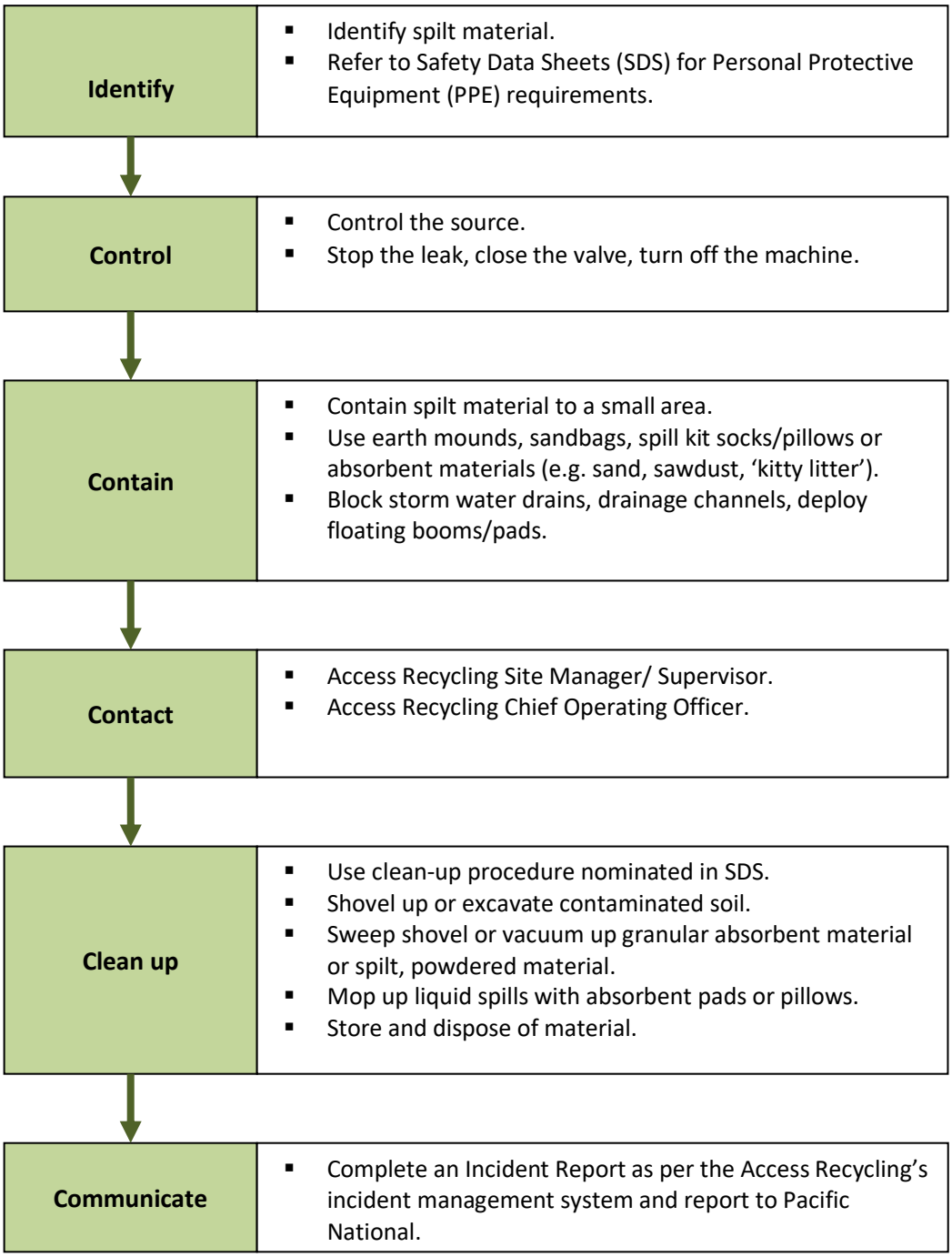
1. Complaint is received
2. Complaints are registered on the Access Recycling Incident / Hazard Report Form
3. The following people would be notified:
    - Site management
    - Access Recycling Chief Operating Officer
4. The complaint would be responded to by an appropriate Access Recycling staff member
5. The outcome of the complaint would be documented and the above people would be notified of the outcome in writing.

11. INCIDENT AND EMERGENCY MANAGEMENT

An environmental incident constitutes anything that may cause environmental nuisance or environmental harm to the surrounding environment and community (e.g. chemical spill including waste oils that are not contained within a bunded area and can enter the stormwater drainage system or contaminate soils).

Should an environmental incident, accident or emergency occur, being an event that causes environmental nuisance, material environmental harm or serious environmental harm, Access Recycling Site Manager / Supervisor will immediately take action/s to minimise the impact.

The following flow chart provides guidance as to management of an incident using spill or release of contaminant as an example.



11.1. Incident Reporting

The Site Manager must raise an Incident Report and may retain the expertise of others to conduct the investigation.

EMERGENCY

WHAT TO DO IN ALL CASES:

FIRST PERSON AT SCENE

Stay calm
Check for danger
Assess incident
Take appropriate action

As soon as possible contact:

SUPERVISOR

(Supervisor to arrange appropriate emergency service required on site by phoning 000)

OR

PHONE: 000 OR 112 (Mobile Phones)

Give the following details when raising the alarm:

NAME OF CALLER
LOCATION AND NATURE OF EMERGENCY

The person being notified of the emergency will need details of the incident in order to initiate an appropriate response.

DO NOT HANG UP UNTIL ADVISED TO DO SO

If possible arrange to have someone meet the Emergency Service at main gate to direct to emergency

EMERGENCY PROCEDURE

In the event an emergency

KEEP CALM

DIAL 000 or 112 (mobile)

Address:

Nearest Cross Road:

Contact Name:

Contact Number:

Further Information:

GPS Coordinates Lat: _____deg _____sec Long: ——deg sec_____

Nearest Ambulance Phone: **000** Werris Creek Fire Brigade: 02 6768 7404

FIRE	MEDICAL
Type of Fire	No. of persons injured
Size of Fire	Type of emergency
Ensure all persons are accounted for	Type of injuries
If safe to do so remove all plant from the area	Ensure the area is made safe before attempting to render assistance.
Contact Access Recycling Management **Bob Taylor – 0487 811 007** **Name:**	Contact Access Recycling Management **Bob Taylor – 0487 811 007** **Name**
NOTE: Only attempt to extinguish the fire if safe to do so	NOTE :Once area is safe, complete **DRSABC** (if trained) and give assistance
Investigate	Investigate

REMEMBER

QUICK RESPONSE CAN SAVE LIVES

12. ENVIRONMENTAL RISK ASSESSMENT

12.1. Methodology

To undertake the works, a risk matrix was developed by Access Recycling to identify the likelihood and consequences of environmental impacts from activities associated with the activity. The matrix and descriptions of the categories of probability and consequence are provided below.

	Likelihood or Probability					
	Environment	A	B	C	D	E
		Almost Certain *(expected)*	**Likely** *(will probably occur)*	**Moderate** *(might occur - has happened)*	**Unlikely** *(could occur - known to happen)*	**Rare** *(practically impossible)*
1	Negligible Discharge	**High 15**	**Medium 19**	**Low 22**	**Low 24**	**Low 25**
2	Uncontrolled Discharges in Minor Quantities	**High 10**	**High 14**	**Medium 18**	**Low 21**	**Low 23**
3	Moderate Breach of Environmental Statutes	**Extreme 6**	**High 9**	**High 13**	**Medium 17**	**Medium 20**
4	Major Breach of Environmental Statutes	**Extreme 3**	**Extreme 5**	**Extreme 8**	**High 12**	**High 16**
5	Shutdown of Site due to Environmental Breach	**Extreme 1**	**Extreme 2**	**Extreme 4**	**Extreme 7**	**High 11**

Risk Ranking	Risk Score	Risk Description
Low	**21 - 25**	Tolerable. Monitor, manage and carryout activity in accordance with identified controls.
Medium	**17 - 20**	Implement strict control measures reduce hazard to ALARP. **Activity must not commence without appropriate Supervision.**
High	**9 - 16**	Implement strict control measures reduce hazard to ALARP. **Activity must not commence without Management approval and appropriate Supervision present.** Review process.
Extreme	**1 - 8**	Intolerable. **Activity must not commence.** Eliminated hazard or introduce further controls to reduce to ALARP.

12.2. Environmental Risk Assessment Results and Control Measures

ENVIRONMENTAL ASPECT AND TASK	HAZARD RANKING & RISK SCORE	CONTROL MEASURES	CONTROL RANKING & RISK SCORE	RESPONSIBILITY
Biodiversity Damage to native vegetation from scrap metal stockpiling Damage to native vegetation and soil profiles at roadside verges from trucks entering and leaving work areas Damage to native vegetation from vehicular traffic movements adjacent to the designated stockpile area.	18 Medium	1. Where access is available via designated formed access roads this will be the first preference. All vehicles are to use the existing access tracks for movement. 2. Truck drivers are to receive clear and written instructions from the operations manager so that entry points can be found easily to avoid any U turning, reversing etc. 3. Where access is limited by tracks through wet depressions, access through native vegetation and grassy areas is not permitted. Vehicles are to find alternate access using public roads to travel around these areas. Alternatively, with proper track protection, the rail formation may be used.	21 Low	All Staff
Biodiversity Weed spread from vehicular traffic	18 Medium	4. Where possible scrap activities should take place from hard stand areas where these exist or areas that have little or no vegetation. Where declared and/or noxious weeds are present in work areas or on access track and pose a serious threat of spread, they will be managed as per directives for its declaration under the *Noxious Weeds Act 1993* and the *Natural Resources Management Act 2004* (e.g. the growth and spread of the plant should be controlled according to the measures specified in a management plan published by the local control authority). 5. When working in heavily weed infested areas, plant and equipment is to inspected and cleaned down, where required, prior to leaving the work area.	21 Low	Site supervisor
Biodiversity Disturbances to threatened fauna habitat and flora species	18 Medium	6. Where access is available via designated formed access roads this will be the first preference. All vehicles are to use the existing access tracks to access work area.	21 Low	All Staff
Emissions to air Movement of vehicles along rail corridor	18 Medium	7. Minimise vehicle movement and speed on unsealed tracks and paths to reduce dust generation. 8. Manage dust through watering of unsealed roads if required. 9. Maintain and operate vehicles efficiently, and to manufacturer's specifications so as to minimise air emissions.	21 Low	All Staff
Spillage of hazardous and non-hazardous materials Spillage of asbestos, hydrocarbons, radiator fluid, battery acid, air-	13 High	10. Store any hazardous chemicals securely, as per Access Recycling SWMS, and the appropriate legislation. 11. Ensure appropriate waste contractors are employed to collect waste.	17 Medium	All Staff

ENVIRONMENTAL ASPECT AND TASK	HAZARD RANKING & RISK SCORE	CONTROL MEASURES	CONTROL RANKING & RISK SCORE	RESPONSIBILITY
conditioning fluids etc. during site operations.		12. Seal and store all chemicals and fuel during transport, and only in approved containers. 13. Label all chemicals and fuels clearly, including using approved warning symbols and placards. 14. All hazardous materials must be stored within designated areas which must be adequately signposted and fenced. 15. Check compatibility of all chemicals fuels stored. Do not store or transport chemicals, fuels, including LPG, together which react dangerously when combined. 16. Ensure SDSs are available for all hazardous materials transported, used or handled by Access Recycling. Obtain the SDS for any new chemical used, and implement controls to mitigate potential environmental risks and impacts. 17. Use drip trays or temporary bunds for temporary storage of chemicals, and fuels during re-fuelling activities. 18. Only undertake remote re-fuelling activities at locations away from sensitive environments such as a drain or watercourse, and implement adequate and appropriate spill prevention and management procedures. 19. Maintain and use spill control equipment at worksite. Locate spill kits in pertinent locations. 20. Train staff in spill kit use and emergency response procedures. 21. Regularly maintain plant and equipment to manufacturer's specifications so as to minimise spills and leaks. 22. Only conduct servicing or maintenance of plant and equipment in areas which have been designated for these actions. 23. Use biodegradable hydraulic oils wherever possible. 24. Machinery is not to be stabled in areas near watercourses or drains.		
Bushfires Fires in grass and debris on site caused by vehicle movement	22 Low	25. Identify bushfire danger risk rating prior to site work. 26. Where practicable, provide a fire extinguisher in all vehicles, and keep adequate fire-fighting equipment on hand during ALL 'hot work'. 27. Keep water tank full. 28. Extinguish any unattended fire as soon as observed. Contact authorities immediately where this is beyond the ability of site staff. 29. If a fire approaches a worksite, secure hazardous materials and fuels immediately,	24 Low	Site Supervisor

ENVIRONMENTAL ASPECT AND TASK	HAZARD RANKING & RISK SCORE	CONTROL MEASURES	CONTROL RANKING & RISK SCORE	RESPONSIBILITY
		and raise the alarm (Staff must be able to describe the site location/address to emergency services.) 30. Maintain machinery to the highest standard to ensure mufflers and exhaust systems cannot cause fires. 31. Keep engine bays clean from dust, grass and leaf litter buildup.		
Spillage of scrap in transit	22 Low	32. Drivers to be trained in spillage of scrap procedures, further details can be seen in the Access Recycling heavy vehicle driver's handbook. 33. Drivers are to make the area safe and warning any potentially affected persons. 34. After making safe the area, drivers are to contact emergency services and management immediately for further assistance.	24 Low	All Staff
Waste Securing potentially windblown materials and site cleanup at completion of works	18 Medium	35. Before commencing work activities identify waste disposal options including opportunities to reduce, re-use and recycle waste 36. Access Recycling housekeeping procedures and reporting is in place at all sites. At the Site Manager's discretion, a site tidy checklist may be developed. 37. Site tidiness must be discussed at all pre-work meetings and cleanup undertaken at completion of works at each site location	21 Low	All Staff
Noise Excessive noise generation through vehicle movement and work activities near sensitive receivers	22 Low	38. During site establishment, consider the proximity of sensitive receptors when locating temporary work site facilities and stationary equipment, especially in residential or built-up areas. 39. Maintain and operate all vehicles and equipment to manufacturer's specifications so as to minimise noise emissions. 40. Where practicable, turn off vehicles and equipment when not in use. Minimise idling as far as practicable. 41. Minimise speeds for off-road vehicle movements (e.g. on access paths) as far as practicable. 42. Notify residents of any works that may create offensive noise outside these preferred times, and (where feasible) advertise a 24 hour contact number to both convey information and receive any complaints. 43. Locate site access roads as far as possible from residential receivers.	25 Low	Site Supervisor All Staff

ENVIRONMENTAL ASPECT AND TASK	HAZARD RANKING & RISK SCORE	CONTROL MEASURES	CONTROL RANKING & RISK SCORE	RESPONSIBILITY
Consumption of natural resources Use of fuels	15 High	44. Minimise the use of fuels, materials and electricity, as far as practicable. 45. Maximise fuel efficiency by turning off idling plant and equipment, where practicable. 46. Recycle and re-use materials as far as practicable.	19 Medium	All Staff

13. EVALUATION

Access Recycling will monitor and measure, on a regular basis, the key characteristics of its operations and activities that can cause incidents or significant impact on the environment. The effectiveness of these measures shall be evaluated.

13.1. Inspection, Testing and Monitoring

Appropriate equipment for monitoring and measurement related to the work site, including contractor equipment and personnel, will be identified, calibrated, maintained and stored as necessary. Records of this shall be retained according to documented procedures. Access will maintain systems to monitor:

- Performance, effectiveness of relevant operational controls and conformance with objectives and targets; and
- Compliance with relevant environmental legislation.

13.2. Workplace Monitoring

Workplace inspections according to the type of site will be conducted are pre-determined stages. The monitoring will be carried out by the Site Manager and Access Recycling Chief Operating Officer. The inspection will include: monitoring work tasks against the relevant SWMSs, inspecting housekeeping methods and effectiveness, contractor work areas and equipment, collating incident and hazard reporting records, pre-work briefings and tool box meeting records, pre-start checks, and service reports.

13.3. Audit of the Environmental Management System

Access Recycling will establish, implement and maintain an audit program and procedures for periodic audits to be carried out by competent persons, in order to:

- Determine whether this Management System:
    - Conforms to planned arrangements for environmental management;
    - Has been properly implemented and maintained; and
    - Is effective in meeting the company's environmental policies as well as the objectives and targets for continual improvement; and
- Provide information on the results of audits to management and relevant employees.

The audit program, including schedule, shall be based on the importance of the activity concerned and the results of previous audits. The procedures will cover the scope, frequency, methodologies and competencies, as well as the responsibilities and requirements for conducting audits and reporting results.

13.4. Corrective and Preventative Action

The findings, conclusions and recommendations reached as a result of inspection and testing, audits and other reviews of the Environmental Management Plan shall be documented and the necessary corrective and preventative actions identified.

All issues identified will be highlighted with an action plan to implement timely controls to improve Access Recycling environmental management system.

The results of any audits or investigations must, on request be provided to the local Pacific National manager.

The results of any inspections or audits will be communicated to employees and contractors at Tool Box meetings.

13.5. Documentation and References

- Records, Safe Work Procedures, Job Safety Analyses, Pre-start Checks, Pre-work Briefings, Tool Box Meeting minutes, Locomotive Fluids and Hazardous Materials Disposal Forms, etc.
- Audit Schedule.

14. RELEVANT ENVIRONMENTAL RECORDS

The following Access Recycling documents provide the evidence of compliance with both Access Recycling's Environmental Policy and commitment and our Legislative obligations.

They must be progressively completed and kept up-to-date by the Chief Operating Officer in systematic files which are readily accessible for review and/or audit.

- Environmental Policy
- FORM003 Hot Work Permit
- FORM006 Job Safety Analysis
- FORM018 Record of Tool Box Talk
- FORM034 Injury /Incident /Hazard Report
- FORM075 Locomotive Fluids and Hazardous Materials Disposal Form
- FORM068 Visitors and Contractors Sign in Register
- FORM069 Job Safety Observation
- Asbestos Management Plan
- Emergency Procedures Manual
- Employee Induction and Health and Safety Handbook
- Visitors Induction