

## Environmental Management Plan

### Table of Contents

1. Introduction .....	2
2. Environmental Policy .....	3
3. Planning.....	4
3.1 Environmental Aspects .....	4
3.2 Legal and Other Requirements.....	5
3.3 Objectives and Targets .....	6
3.4 Environmental Management Programs .....	6
3.5 Alternatives Evaluation .....	7
3. Implementation & Operation.....	8
4.1 Structure and Responsibility .....	8
4.2 Document Control .....	8
4.3 Operational Control.....	9
4.4 Training, Awareness and Competence .....	10
4.5 Communication .....	10
4.6 Emergency Preparedness and Response .....	12
5. Checking & Corrective Action .....	14
5.1 Monitoring and Measurement .....	14
5.2 Environmental Management System Audits.....	14
5.3 Non-Conformance and Corrective Action .....	15
5.4 Records Management.....	16
6. Management Review .....	17
6.1 Setting the Agenda .....	17
6.2 Outputs from the Review .....	17
7. Overview of Environmental Objectives and Targets .....	17

## Environmental Management Plan

### 1. Introduction

AES Control Systems designs, manufactures, commissions and services HVAC BMS Control Panels, and has developed and is maintaining an EMS in order to ensure that we continue to supply a high quality product to our customers while providing a safe, healthy workplace for our employees and acting as a responsible member of our community. AES Control Systems EMS is designed to help us understand our environmental impacts and, through proactive management, reduce the risks that our operations pose to our employees and to the environment. The EMS is also the means through which we follow through on the commitments expressed in our environmental policy.

AES Control Systems EMS only covers only 72 Tenter Road, Moulton Park Industrial Estate, Northampton, NN3 6AX. More specifically, the EMS covers all operations occurring on-site, from the point of entry of raw materials and energy to the point of exit of finished manufactured products. In addition to manufacturing processes and activities, all on-site ancillary operations fall within the scope of the EMS, including maintenance, grounds keeping, offices, and the activities of on-site contractors. The EMS excludes the environmental aspects of products to the extent that AES Control Systems does not have influence over their design or disposition. The EMS does take waste disposal into account in evaluating the environmental impacts of on-site activities, even though AES Control Systems may not ultimately be the final disposer of its waste.

## Environmental Management Plan

### 2. Environmental Policy

AES Control Systems is committed to promoting sustainability and minimising the environmental impact of its activities. The management of these, and those particularly affecting sustainability issues arising from our works, are considered equally with other business objectives with positive steps being taken to control or eliminate wasteful and/or damaging practices to achieve a sustainable business for the future.

#### Our Principles and Commitment include:

- Complying with environmental legislation, regulations and codes of practice.
- Integrating sustainable and environmental considerations into all our business decisions.
- To provide awareness and understanding of environmental issues to staff and sub-contractors.
- To ensure our activities in the office and transportation are sustainable.
- To review and strive to continuously improve our sustainability performance.
- Inform and instruct staff in the correct handling, discharge and disposal of articles and substances which has an environmental impact.

#### To achieve this, we will:

1. Assess the impact of activities on the environment.
2. Undertake measures to prevent or eliminate pollution. Where this is not feasible, undertake measures, taking account of the possible clean technologies, to reduce pollution and waste to the minimum and conserve resources.
3. Encourage sub-contractors to adopt similar practices to contribute to a sustainable environment.
4. Interact with the public to provide enough information to enable an understanding of the environmental impact of the company's activities.
5. Co-operate with authorities charged with regulatory and monitoring roles.
6. Keep abreast of current good practice for the industry to ensure developing products, process and practices are adopted which will improve sustainability.

All Buildings have mechanical and electrical services in order to provide the facilities necessary for maintaining a comfortable working environment. These services have to be controlled by some means to ensure, for example, that there is adequate hot water for sinks, that the hot water in the radiators is sufficient to keep an occupied space warm, that ventilation is heated and possibly cooled to ensure comfort conditions, irrespective of the number of occupants or individual preferences.

The purpose of a Building Management System (BMS) is to automate and take control of these operations in the most efficient way possible. As designers, manufacturers, electrical installers and commissioners/servicers of electrical control panels for BMS equipment, AES Control Systems aim to improve energy efficiency and reduce fuel use/costs in any building in which its abilities can be applied.

Signed:



Date: 31<sup>st</sup> January 2025

Position:

Managing Director

## Environmental Management Plan

### 3. Planning

Definitions to be used during planning stages:

**Environmental Aspects** - Elements of the organisation's activities, products or services that can interact with the environment.

**Environmental Impact** - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services.

**Significant Environmental Aspect** - Environmental aspects that have, or can have a significant environmental impact.

The planning process includes the identification and updating of AES Control System's Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with AES Control System's Environmental Policy, objectives and targets are established, and appropriate programmes formulated to achieve the objectives and targets.

#### 3.1 Environmental Aspects

AES Control Systems has identified all known environmental aspects and related impacts of its activities and products, which can be controlled, and influenced, in order to determine the impact on the environment.

- The list of environmental aspects and related impacts will be reviewed at least annually by the Health & Safety Manger to identify the significant aspects. New aspects and impacts may need to be identified and ranked more frequently if modified or new activities occur during the year.
- The Health & Safety Manger will use the aspect procedure below and related documents to carry out the identification and significance ranking of aspects and associated impacts.

#### Environmental Aspect and Impact Analysis and Ranking Procedure

1. The Health & Safety Manger will identify the environmental aspects of its activities, products, or services related to air emissions, discharge of liquid waste, disposal of solid waste, land and water contamination, use of raw material and natural resources, that it can control and over which it can be expected to have influence. These are recorded in Appendix A – Environmental Aspects.
2. After identifying the aspects, the Health & Safety Manger will consider them for severity of occurrence, frequency of occurrence and quantity using the table below. These are recorded in Appendix B – Environmental Impacts.

## Environmental Management Plan

<b>RISK MATRIX</b> Multiply Likelihood by Severity to obtain score				<b>Risk Score = 1</b>	Negligible impact to environment and/or no danger to the health of humans or wildlife.
<b>Likelihood of harm</b>	<b>Severity of Injury</b>			<b>Risk Score = 2</b>	Acceptable – 2a – unlikely to cause serious risk; 2b – may cause slight risk.
	<b>Slight -1</b>	<b>Serious – 2</b>	<b>Major - 3</b>	<b>Risk Score = 3a</b>	Danger of non-life threatening health effects to humans or wildlife, or short term effects on environment (< 1yr).
<b>Unlikely 1</b>	1	2a	3a	<b>Risk Score = 3b &amp; 4</b>	Tolerable – Substantial control measures to be in place.
<b>Possible 2</b>	2b	4	6	<b>Risk Score = 6</b>	Intolerable – Potentially life altering/threatening to humans / wildlife, or significant long term environmental effects (> 1yr)
<b>Likely 3</b>	3b	6	9	<b>Risk Score = 9</b>	Unacceptable – refer the operation to the Manager responsible to consider alternative methods of working.

- Aspects that received an overall 6 or higher for the total rank will be evaluated for significance by the Health & Safety Manager. The Health & Safety Manager will use the ranking of the associated impacts along with knowledge of the potential scale of impact, probability of occurrence, and knowledge of daily operations to determine the significance of the associated aspect.

### 3.2 Legal and Other Requirements

AES Control Systems recognises its duty to comply with statutory requirements that relate to its activities, products and services. AES Control Systems further recognises that this goes beyond environmental legislation to all that relates to its significant environmental aspects and impacts.

Operating across a wide variety of professions; AES Control Systems have employed Croner Consulting to support the business in meeting its obligations. Changes and amendments to legislation and codes of practice are passed to the Health & Safety Manager by regular email alerts or by attendance at seminars and training courses. The costs incurred in such training is supported by AES Control Systems and identified as Continued Personal Development (CPD) through the appraisal process. It is required that the Health & Safety Manager be responsible for circulating such changes to appropriate Managers and/or employees. In this way the Company is able to meet statutory compliances.

In addition, AES Control Systems subscribes to a number of services (e.g. Constructionline) which contribute to the agenda by screening suitable contractors who help in the provision of its services.

Appendix C – Legal Requirements provides a list of environmental regulations that apply to AES Control Systems.

## Environmental Management Plan

### 3.3 Objectives and Targets

In order to make continual improvements to its environmental performance, AES Control Systems recognises the need to set achievable objectives and targets, implementing them through environmental improvement programmes. Our definition of objectives and targets are:

*Objective* - Overall goals for environmental performance arising from environmental policy.

*Targets* - Specific, quantifiable aims to be achieved within a time-frame.

- The Health & Safety Manger will maintain a listing of documented environmental objectives and targets Appendix D – Environmental Objectives and Targets.
- The Health & Safety Manger will establish environmental objectives and targets annually.
- The Health & Safety Manger will consider at least the following information when developing new objectives and targets:
  - legal and other requirements
  - significant environmental aspects and impacts
  - prevention of pollution
  - technological options
  - financial, operational and business requirements
  - AES Control Systems environmental policy
  - Views of interested parties.

### 3.4 Environmental Management Programs

AES Control Systems recognises the need to have a documented procedure for establishing, maintaining and amending its environmental programmes. However, because it operations do not have Significant Environmental Aspects; such environmental programmes themselves do not need to be documented and therefore use discretion on whether these are formally recorded. Any procedures defined will be stored in Appendix E – Environmental Management Programs.

AES Control Systems definition of an environmental programme is: a series of time-tabled tasks designed to achieve our objectives and targets for established significant environmental aspects.

Any Environmental Programmes will state the following:

1. The means by which the programme will achieve the set objectives and targets.
2. The time-frame of the programme.
3. The person(s) responsible for delivering the programme.
4. The means and frequency of monitoring the programme and the units of measurement.
5. Once completed, the result of the programme (i.e. if the objectives and targets were achieved and if not, the reasons why).

## Environmental Management Plan

At the same time as objectives and targets are established for significant environmental aspects, programmes to achieve them will be drawn up if deemed helpful using the Environmental Objectives and Management Plans documentation within Appendix E. It will be the responsibility of the Health & Safety Manager to implement and deliver such programmes in consultation with relevant staff. The Management Team will be made aware of all proposals for any particular Environmental Management Programme in order to ensure its full support.

Progress of the programmes will be reported by the Health & Safety Manager to the Directors at Board Meetings where any further amendments will be suggested and approved. The Health & Safety Manager will be responsible for ensuring implementation of any recommended changes. Any newly identified significant environmental aspect(s) will have objectives, targets and an environmental programme established for them as soon as it is practicable to do so.

Should anyone with responsibility for Environmental Management Programmes propose that an amendment to a programme be made, a review of the existing programme will be undertaken. Should any amendments be approved a revised document will be prepared and authorised. The amended programme will be appropriately communicated and implemented.

### 3.5 Alternatives Evaluation

If AES Control Systems does adopt an operation with a Significant Environmental Aspects, it may be necessary to periodically conduct an alternatives evaluation to identify viable approaches to reaching an environmental objective. An alternatives evaluation is a tool for identifying alternative products and/or processes and evaluating them compared to the baseline based on business and environmental criteria.

#### Procedure:

1. The Health & Safety Manager appoints a small group/individual, overseen by the relevant operations manager, to identify and evaluate alternatives to a particular activity or process where an alternatives evaluation is required for meeting an environmental objective.
2. The group/individual first identifies the function that this activity or process performs in AES Control Systems operations. The group also characterises the baseline, or the current manner in which the function is being carried out.
3. The group/individual then brainstorms alternative ways of accomplishing this function. Potential alternatives include using a different material or chemical, changing work practices, and/or changing process technologies. Alternatives are recorded using the Alternatives Identification documentation within Appendix F, and the most promising alternatives are assigned for further research.
4. The group/individual then evaluates the baseline and alternatives based on the following considerations: operational performance, cost, regulatory implications, and environmental impact, and records its findings using the Evaluation documentation within Appendix F.
5. The group/individual makes a recommendation and presents its recommendation to the Health & Safety Manager and appropriate operations managers.

## Environmental Management Plan

### 4. Implementation & Operation

#### 4.1 Structure and Responsibility

AES Control Systems has defined, documented and communicated the roles, responsibility and authority of personnel in order to facilitate effective environmental management. These roles and responsibilities are identified below.

Role	Responsible Party	Responsibility
Directors	Darren Kirby James Harman Phillip Mitchell	Assure adequate human, training, technological, and financial resources are available to implement and control EMS resources
Health & Safety Manager	Phillip Mitchell	Assure the EMS requirements are established, implemented and maintained.
Management Team	Refer To Staff Structure	Assist in the continual implementation of the EMS as defined in the EMS manual
Staff	Refer To Staff Structure	Comply with the requirements of the EMS and act appropriately with regard to issues affecting impacts on the environment. Assist in achieving environmental objectives and targets.

#### 4.2 Document Control

AES Control Systems has established a Document Control System that controls all documents and data ensuring: they can be located; they are periodically reviewed, revised as necessary and approved for adequacy by authorised personnel; the current versions of relevant documents are available at all locations where operations could significantly impact the environment; obsolete documents are assured against accidental use and those retained for legal or knowledge preservation suitably identified; and they are legible, dated, readily identifiable and properly stored.

- The Health & Safety Manager will control the development or modification of any EMS document.
- The Health & Safety Manager will assure all records will be uniquely identifiable. Records will be maintained according to requirements of their corresponding procedures.
- The Health & Safety Manager, will replace existing hard copies of any controlled documents, which have been revised.
- The Health & Safety Manager will ensure all documents made **obsolete** by revised or new documents will be stamped “Obsolete” or will be discarded. Any copies of obsolete procedures retained will be stored electronically for reference and to reflect progression/improvement.

AES Control Systems is the trading name of Associated Engineering Services Ltd, and is a private limited company registered in England and Wales. Registration number: 1679686.  
Registered office: 72 Tenter Road, Moulton Park, Northampton NN3 6AX.

## Environmental Management Plan

- The Health & Safety Manager will be responsible for informing relevant staff of any amendments to documentation within the manual and disposing of obsolete material. All documentation is to be stored electronically, access to which is unrestricted on a 'view only' basis. Printed copies can be made available to anyone and will show display 'UNCONTROLLED DOCUMENT' across each page.

Anyone can apply for a document to be amended, using Appendix G – Environmental Query. All such correspondence will be stored in the EMS electronically. If an amendment is deemed appropriate, the Health & Safety Manager will make a copy in electronic form of the document and either make the amendment to the new copy or forward it to the amendment requester to draft a proposed amendment. The proposed amendment will be passed back to the Health & Safety Manager who will approve and input the new version of the document into the EMS. The superseded document will be archived electronically for reference and to reflect progression/improvement.

### 4.3 Operational Control

AES Control Systems acknowledges the importance of documenting our process for writing, updating and reviewing all our documents including EMS documentation. It is the responsibility of the Health & Safety Manager to write and amend any procedure for a process with a Significant Environmental Aspect, maintain it in this manual and ensure that each conforms to the procedure described here. The Health & Safety Manager will also ensure that new or amended procedures are electronically added to the EMS and that superseded documents are properly archived.

However, because AES Control Systems operations do not have Significant Environmental Aspects; such environmental procedures themselves do not need to be documented and therefore use discretion on whether these are formally recorded. If, as part of any review, the Health & Safety Manager determines the need for (and adequacy of, if already existing) operational control procedures to control activities related to a Significant Environmental Aspects, the findings will be recorded using the Operational Control Procedures documentation in Appendix H – Environmental Procedures.

Where there is a need to create or modify an operational control procedure, the Health & Safety Manager will assign a member of the Management Team to draft an operational control procedure, based on consultation with the employees who undertake that procedure. In many cases, a separate operational control procedure may not be required, rather the integration of environmental control procedures into an existing procedure. The operational control procedure should take the form of a "Work Instruction," namely a summary list of required steps or measures. In addition to describing the steps necessary to carry out the particular activity in an environmentally sound manner, the work instruction should also include steps to conduct monitoring, where applicable.

All documentation will be reviewed in the annual EMS Audit detailed within this manual. It is the sole responsibility of Health & Safety Manager to write, review and update all policies relating to the EMS on an annual basis and/or if circumstances change. Anyone can apply for any document or procedure to be amended, using Appendix G – Environmental Query.

## Environmental Management Plan

### 4.4 Training, Awareness and Competence

AES Control Systems recognises that it is important to train all staff in general environmental awareness, in particular that relating to its operations. This information may be provided in various forms such as presentations, departmental briefings, wall mounted notices and the Company's staff intranet.

The Health & Safety Manager will identify environmental training needs for Company employees and design, write and approve the appropriate training materials. Training needs will be identified as part of the annual staff appraisal process, with some staff receiving additional environmental training if their work directly relates to identified significant environmental aspects/impacts or has the potential to create a significant impact on the environment.

The Management Team are responsible for ensuring that their employees receive the appropriate task-specific environmental training. Where possible, environmental training is integrated with other types of training (e.g., operational) that employees are receiving.

Using the documentation in Appendix I – Awareness & Competence, records of all staff environmental training will be held by Human Resources at 72 Tenter Road, Moulton Park Industrial Estate, Northampton, NN3 6AX.

Feedback from any training undertaken will be collected and the training materials will be evaluated for their effectiveness. It will be the responsibility of the Health & Safety Manager to review such feedback and amend training materials as necessary, keeping them up-to-date with changing legislation, requirements etc.

### 4.5 Communication

AES Control Systems recognises the need to ensure that an effective internal system of communication between staff is in place regarding environmental issues and the Environmental Management System (EMS). General EMS information to be communicated to all staff can include our overall energy performance, results of EMS audits, changes to policy, procedures and new environmental initiatives. This will take the form of briefing meetings, paper based material, notice boards and the Council's intranet.

Information regarding the EMS and other environmental issues shall be communicated to staff through continued training.

The Management Team will be responsible for responding to any environmental queries direct from staff. During training briefings, talks etc, the Management Team will be available to staff to voice their opinions on environmental matters, any queries which are unable to be adequately answered will be noted and answered when the information is available.

## Environmental Management Plan

Once a formal enquiry has been received, the Health & Safety Manager will decide upon the best course of action to take. This could include:

- a) Dealing with the enquiry directly
- b) Seeking information from sources such as a consultant or an environmental organisation.

The Health & Safety Manager will ensure that the query is resolved as far as practicable. After responding to the communication in the most appropriate manner, the Health & Safety Manager must later ensure that the communication is documented within the EMS including using Appendix G – Environmental Query;

- a) The date of the query
- b) Who the communication was between and who the enquirer was
- c) What means of communication were used
- d) What the Communication was about
- e) What the eventual outcome of the communication was
- f) Any actions resulting from the communication.

AES Control Systems also recognises that it is important to state how environmental communications from external interested parties will be received, documented and responded to.

Any employee receiving a communication from an external interested party via any medium (e.g. telephone, letter, email, direct verbal) may respond to the enquiry provided they are adequately informed in order to do so. If the member of staff receiving the communication is unable to provide a satisfactory response, the Management Team will be consulted. Once a formal enquiry has been received, the Health & Safety Manager will follow the above procedure in responding and collate all the information necessary to provide a satisfactory response. In the event of a visit in person by an external interested party, either announced or unannounced, the Health & Safety Manager will ensure that the immediate enquiry is dealt with either directly or by an appropriate member of staff. Follow-up information/action may also, of course, be needed for an adequate response.

Any member of staff responding to an external communication must ensure that the Management Team is informed of any environmental communication. The Health & Safety Manager must then record the information in the above documented fashion, using Appendix G – Environmental Query.

## Environmental Management Plan

### 4.6 Emergency Preparedness and Response

AES Control Systems recognises its duty to develop a procedure which lays out the way in which potential environmental emergencies and incidents are identified and managed and how emergency response procedures will be documented, reviewed, amended and tested.

We define an environmental emergency as: A significant unauthorised/uncontrolled release of a substance or substances in any form (e.g. a gas, a liquid, a solid, a nuisance such as noise, vibration, odour or any combination of these) into the environmental media (air, land, water) requiring **immediate and urgent** action to prevent or minimise environmental impact(s) which would be likely to result in any one or a combination of the following:

- a) The calling of any emergency service
- b) The notification of the Environment Agency or Local Authority Environmental Health Officer and which is likely to result in any form of action by them
- c) Legal proceedings against the organisation under environmental legislation
- d) Justifiable complaints from local residents and/or environmental groups
- e) Significant long/medium-term environmental damage/harm (e.g. to humans, flora, fauna, water/land contamination, property)

We define an environmental incident as: Unauthorised/uncontrolled release of a substance or substances in any form (e.g. a gas, a liquid, a solid, a nuisance such as noise, vibration, odour or any combination of these) into the environmental media (air, land, water) requiring action to prevent or minimise environmental impact(s) which would be likely to result in any one or a combination of the following:

- a) The calling of any emergency service
- b) The notification of the Environment Agency or Local Authority Environmental Health Officer
- c) A breach of environmental legislation
- d) Complaints from local residents and/or environmental groups
- e) Identifiable environmental damage/harm (e.g. to humans, flora, fauna, water/land contamination, property)

Significant environmental incidents and emergencies that are considered to be a possibility include:

- a) Gas emission or fire at Company premises
- b) Contamination of water source from products used in Company processes

AES Control Systems contracts with service providers cover Emergencies and Incidents.

It is the responsibility of the Management Team to communicate emergency and incident preparedness and response procedures to appropriate staff to a level that they can manage any environmental emergencies and incidents within their areas of responsibility and assist in the following inquiries/investigations.

## Environmental Management Plan

It is also the responsibility of the Health & Safety Manager to store and maintain a register of incidents/emergencies, detailing the department to which the procedure and incident relates in addition to the outline information of the incidents. All incident procedures are detailed on relevant COSHH assessment sheets and to date there have been no incidents or emergencies. The details in the record will include the following using Appendix J – Environmental Investigation:

- a) how the incident occurred, the date on which it occurred and any relevant associated background information
- b) the extent of the incident including quantities and nature of the substances involved
- c) the actions taken
- d) any necessary remedial steps
- e) external bodies involved and/or notified together with any action they took
- f) the overall outcome in terms of the environmental damage, estimates cost, complaints and effects on the organisation's reputation
- g) any environmental legislation breached
- h) how the incident may be prevented in the future
- i) any follow-up action (with responsibility for them indicated), including the date these actions were completed and by whom

After every environmental emergency/incident there will be, as soon as practical, an inquiry or investigation. The Health & Safety Manager will decide on the level of inquiry or investigation required to be undertaken into each emergency/incident. The minimum will be a report providing the details given above for more minor incidents, up to a full management led investigation for analysis of emergency situations. The target time for completion of such inquiries/investigations is within one month for the more minor incidents to within three months for emergency situations and the more major incidents.

## Environmental Management Plan

### 5. Checking & Corrective Action

#### 5.1 Monitoring and Measurement

AES Control Systems recognises that should its business operations change, it may be necessary to establish and maintain a system for measuring and monitoring key characteristics of its operations that can have a significant impact on the environment. Such a system would include recording information to track performance, relevant operational controls and conformance with the established objectives and targets. If instigated:

- The Management Team will monitor any established environmental performance indicators.
- The Management Team will assure any monitoring equipment used shall be calibrated and maintained and records kept.
- The Health & Safety Manager would periodically evaluate compliance with relevant environmental legislation and regulation using the following procedure.

Due to its current operations, AES Control Systems does not undertake any measurement and monitoring of key characteristics other than for Service Utilities (i.e. Gas, Electricity, and Water).

#### 5.2 Environmental Management System Audits

AES Control Systems has established and maintains procedures to carry out periodic audits of the environmental management system. Auditing of company documents, contracts and policies is carried out by the Health & Safety Manager and if deemed necessary by external auditors. It is the responsibility of the Health & Safety Manager to write and approve any EMS audit programme detailing;

1. the number of audits to take place
2. the areas of the EMS to be audited
3. when the audits are to be conducted
4. who will conduct the audits

The purpose of audits is to determine if the EMS has been properly implemented and maintained. In particular, to ensure:

- Each procedure is being carried out as stated in this manual
- AES Control Systems environmental policy is being upheld
- Progress is being made in meeting the environmental objectives

The Health & Safety Manager will conduct the audit using the Internal Assessment Checklist and Assessment Record within Appendix K – System Audit and present the results of the EMS audit to the Directors for review.

## Environmental Management Plan

### 5.3 Non-Conformance and Corrective Action

AES Control Systems has established and maintains a procedure to determine how non-conformances within our EMS are identified and processed, how corrective or preventative actions are identified, implemented and monitored and how any action to mitigate environmental impacts will be decided upon and implemented.

We have identified two types of non-conformances:

- A.** an element (or a number of elements) of the EMS do not comply
- B.** the EMS element(s) is in theory correct but is not being implemented correctly, (e.g. procedure compliant but is not being followed in practice).

System non-conformances of **A** will normally be identified by an EMS auditor during an official audit. Non conformances of **B** may be identified by any individual involved in the day to day operation of the EMS.

It is the responsibility of the Health & Safety Manager to receive and document reports of non-conformance or potential non-conformance using Appendix G – Environmental Query. On receipt of such a report, the Health & Safety Manager will:

- a) Record the observation detailing; the date, the observer, a description of the non-conformance
- b) Assess any environmental impact that may have been caused by the non-conformance and arrange for mitigating action when needed. The emergency response procedure must be used when appropriate.
- c) Liaise with relevant staff to identify the root cause of non-conformance and to develop corrective/preventative measures through an action plan for corrective actions. The action plan should consider:
  - i. Any immediate remedial action taken.
  - ii. What the identified root cause of the non-conformance is.
  - iii. What longer term corrective/preventative measures are to be taken
  - iv. Any changes to procedures or documentation resulting from the measures
  - v. Defining who is responsible for implementing the action plan.
- d) Ensure that implementation of the action plan is carried out by the designated individual(s). In the case of **A** non-conformances, the Directors must first approve the action plan prior to implementation.
- e) Communicate any changes in procedures to relevant staff.
- f) Decide the extent of follow up action required once the action plan has been implemented. Changes as a result of **A** non-conformances will require a specific follow up audit to check compliance. Changes as a result of **B** non-conformances can be checked through the following annual EMS audit programme.

## Environmental Management Plan

### 5.4 Records Management

It is the responsibility of the Health & Safety Manager to maintain records to the company standards. This includes the collection, indexing, filing, storage, retrieval and retention of all records and stating where and in what form the documents are held and who is responsible for access to them. The Health & Safety Manager will verify record locations annually to ensure that all EMS records are in the correct place. This may be achieved through the EMS audit programme.

#### Procedure

- a) All environmental records shall be legible, identifiable and traceable to the activities involved. They may be in the form of any type of media such as hard copy or electronic media.
- b) Environmental records shall be collected in the office or in facilities where they shall be filed, stored and maintained in proper facilities to ensure ready access and preservation against damage, deterioration and loss.
- c) Responsible person for collecting and checking the records and collection methods shall be specified in Environmental Procedures or Environmental Management Plan.
- d) The Health & Safety Manager shall maintain and update a Master List of Environmental Records in Appendix L (Document Records) which specifies the type/name of records, the form number (if applicable), the party responsible for keeping the record, and the retention time.
- e) Environmental records shall be kept in appropriate storage for the following minimum retention periods:
  - 3 years.
  - As specified in the Environmental Procedures or Environmental Management Plan.
  - As required by statute.

Once the retention period has expired the responsible personnel shall decide and authorise the disposal of the relevant records.

## Environmental Management Plan

### 6. Management Review

#### 6.1 Setting the Agenda

In order to ensure management commitment and direction to improvements in our environmental performance, AES Control Systems recognises the need to hold an annual EMS Review. This will take the form of a review meeting between the Directors, and will assess the continuing suitability, adequacy and effectiveness of the entire EMS in achieving the aim of continual environmental improvement. The review will include:

- a) Assessments of internal and accreditation audit reports and the implementation of their findings
- b) The extent to which objectives and target have been met
- c) An evaluation of the suitability of the environmental policy and the effectiveness of the EMS in the following areas:
  - i. changes in applicable legal requirements and other requirements to which the organisation subscribes
  - ii. changes in the products and services of our third parties
  - iii. advances in science and technology with regards to our product
  - iv. lessons learnt from environmental incidents
  - v. market needs
  - vi. communication from external interested parties; including complaints

#### 6.2 Outputs from the Review

Those involved in the EMS Management Review will make a decision on the continued suitability, adequacy and effectiveness of the EMS in achieving the aim of continual improvement. Performance against AES Control Systems objectives and targets will also be documented and amended as required. Any recommendations for change will be recorded in Appendix M – Management Review.

The Directors will be responsible for implementing any changes to human or financial resources to meet the changes.

The Management Team will be responsible for ensuring implementation of any recommended changes which will be carried out in the first six months following the review and in consultation with any affected staff.

## Environmental Management Plan

### 7. Overview of Environmental Objectives and Targets

Energy Management				
Objectives & Targets	Significant Aspects References	Strategies & Actions	Performance Indicators	Actions Taken
<p>Reduce Gas, Water, Electricity &amp; CO2 emissions.</p> <p>(i.e. maximise energy, fuel and water use efficiency)</p>	<p>Gas - Space and water heating.</p> <p>Electricity - Lighting and power.</p> <p>Water – Sanitation.</p> <p>Fuel – Vehicles.</p>	<p>Year on year reduction in Building’s emissions.</p> <p>Ensure that all new energy related appliances (e.g. heaters, fridges) and fixtures (e.g. light fittings) are minimum 4 star rated.</p> <p>Year on year reduction in vehicle emissions (all company vehicles).</p> <p>Acceptable vehicle emission levels will be written into Company Car Policy.</p>	<p>Review of utility bills details reduced usage.</p> <p>Proportion of 4 Star rated appliances and fixtures.</p> <p>Review of vehicle taxation costs (i.e. annual road tax costs have reduced).</p>	<p>Optimise balance of any three phase supply.</p> <p>Optimise heating controls.</p> <p>Rationalise all Admin lighting.</p> <p>Manage exterior foliage to maximise natural lighting.</p> <p>Limit availability of portable heaters.</p> <p>Remove/manage use of electrical appliances – general.</p> <p>Managing Director to approve vehicle leases based on Euro 5 emission standards.</p> <p>Service co-ordinators to carry out work assessments and reviews in order to minimise staff travel times, reduce emissions and maximise efficiency.</p>



## Environmental Management Plan

Management Systems				
Objectives & Targets	Significant Aspects References	Strategies & Actions	Performance Indicators	Actions Taken
<p>Integrate environmental, social and financial assessment into decision making.</p> <p>Reduce the ecological and carbon footprint through management systems, policies and processes.</p> <p>Ensure full compliance with all environmental legislative and regulatory requirements</p>	<p>Gas - Space and water heating.</p> <p>Electricity - Lighting and power.</p> <p>Water – Sanitation.</p> <p>Fuel – Vehicles</p>	<p>Incorporate life cycle costs including, when available, embodied energy assessment into accounting and budgeting procedures.</p> <p>Set targets for energy and water reduction and materials management.</p> <p>Review the Environmental Management System and raise Awareness.</p> <p>Implement a building environmental risk and environmental audit strategy.</p>	<p>Accounting and budgeting procedures incorporate lifecycle costing.</p> <p>Identified cost savings of implementation.</p> <p>Proportion of suppliers and contractors with an EMS.</p> <p>EMS reviewed.</p> <p>Completion of Risk Assessment for Company activities.</p>	<p>Establishment costs verses budget are detailed on monthly accounts.</p> <p>Replacement of vehicles / utility using items discussed at board meetings.</p>



## Environmental Management Plan

Materials Management				
Objectives & Targets	Significant Aspects References	Strategies & Actions	Performance Indicators	Actions Taken
<p>Operate within all applicable statutory environmentally - related obligations.</p> <p>Achieve continuous reduction in solid waste to landfill.</p> <p>Increase recycling rate.</p> <p>Ensure materials and services purchased by the Company incorporate not just financial but also environmental and social impacts into the decision making.</p> <p>Reduce paper consumption.</p>	<p>Waste management.</p> <p>Disposal of redundant electronic equipment.</p> <p>Surface water discharges.</p> <p>Use of substances hazardous to health.</p>	<p>Maintain legal compliance.</p> <p>Work to official guidance.</p> <p>Identify any significant environmental risks and control them in accordance with recognised best practice.</p> <p>Set materials management targets.</p>	<p>Zero non-compliances with legal requirements.</p> <p>Level of compliance with official guidance.</p> <p>Documented significant environmental risks.</p> <p>Recycling and waste collection process implemented.</p> <p>Accounting and budgeting procedures incorporate material expenses.</p>	<p>Contractors and operators supervised for assurance of compliance.</p> <p>All compliances either met or superseded.</p> <p>Material Expenses costs verses budget are detailed on monthly accounts.</p>



## Environmental Management Plan

Environment				
Objectives & Targets	Significant Aspects References	Strategies & Actions	Performance Indicators	Actions Taken
<p>Reduce the impact of noxious and environmental foliage/trees and animals.</p> <p>Prevent drainage routes becoming blocked impacting the soak away of natural causes.</p>	<p>Lighting – reduced natural lighting increasing the use of internal lighting.</p> <p>Ventilation – excessive external noise and noxious smells increasing the number of windows closed and reduced natural ventilation.</p> <p>Surface water discharges.</p>	<p>Assess impact of localised foliage/trees and animals on working environment.</p> <p>Assess impact of obscured windows on working environment.</p> <p>Assess impact of blocked drainage ways/guttering on working environment.</p>	<p>Local foliage/trees are not overgrown.</p> <p>Windows are open during Summer months.</p>	<p>Managing Director to contract external services to maintain foliage/trees.</p> <p>Managing Director to contract external services to clean windows.</p> <p>Managing Director to ensure drainage ways/guttering are inspected and cleared whenever necessary.</p>



## Environmental Management Plan

Communication & Engagement				
Objectives & Targets	Significant Aspects References	Strategies & Actions	Performance Indicators	Actions Taken
<p>Implement environmental awareness training for all staff.</p> <p>Communicate the environmental management achievements as to staff.</p>	<p>Gas and oil for space and water heating.</p> <p>Electricity - lighting and power.</p> <p>Fuel – Vehicles.</p>	<p>Establish mechanisms for staff to provide input into this EMP.</p> <p>Energy consumption data to be provided on a quarterly basis and communicated to staff.</p> <p>Develop and implement training programs and awareness for staff.</p> <p>Ensure induction of all new staff includes information on Environment Policy.</p>	<p>Feedback mechanism established and maintained for this EMP.</p> <p>Number of issues raised and actions taken.</p> <p>Training programs developed and Implemented.</p> <p>Induction incorporating environmental policy and compliance.</p> <p>Records of training to be put on departmental schedules.</p>	<p>Publish utility monitoring information.</p>