**BRCGS SELF-ASSESSMENT TOOL**

**AVM: Environmental Awareness (EAM)**

**Welcome to the BRCGS Self-Assessment tool**

We hope that you will find this useful when preparing your site for an audit against the BRCGS Standard for Packaging and Packaging Materials Issue 5. This tool will be applicable for all BRCGS Standard for Packaging and Packaging Materials Issue 5 audits in the High Hygiene Category.

**How to use the BRCGS Self-Assessment tool**

This tool is designed to help you assess your operation against the requirements of the Standard and help prepare you for your certification audit.

The checklist covers each of the requirements of the Standard and may be used to check your site’s compliance with each of these requirements. The checklist also allows you to add comments or identify areas of improvement in the empty boxes provided at the end of each section.

While we hope that this tool is useful in helping you prepare for your audit it should not be considered as evidence of an internal audit and will not be accepted by auditors during an audit.

**Training**

The BRCGS Training Academy has courses available to improve the understanding of the requirements for the BRCGS Standard for Packaging and Packaging Materials Issue 5 and may be useful for the person using the BRCGS Self-Assessment Tool. For further information on the courses available please visit [brcgs.com/training/](https://www.brcgs.com/training/)

**Further Information**

If you have any further questions about this self-assessment tool or Issue 5 please do not hesitate to contact the BRCGS team.

Email – enquiries@brcgs.com

Telephone – 0203 931 8150

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| Ref.  | Requirement  | Comment |
| **1** | **Senior management commitment and continual improvement** |
| **1.1** | **Environmental management policy** |
| SOI | The company’s senior management shall develop and document an environmental management policy which is authorised, reviewed, signed and dated by an appropriate senior manager.The policy shall include from this Module: environmental aspect and impact management (clause 2) and pollution and incident identification and management (clause 3). |  |
| 1.1.1 | The policy shall state the company’s intention to meet its legal requirements and responsibility to the environment. This shall include a commitment to pollution prevention, waste reduction, its customers’ requirements and a process of continuous improvement.  |  |
| 1.1.2 | The company’s senior management shall ensure that the policy is communicated to all staff. |  |
| 1.1.3 | The company shall maintain a register of relevant environmental laws and standards that are applicable to their industry, country of manufacture, and use, where known.The company’s senior management shall have a system in place to ensure that the company is kept informed of all relevant environmental legislative requirements in the country of manufacture and, where known, the country in which the packaging material will be sold. |  |
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| **1.2** | **Senior management commitment** |  |
| SOI  | The company’s senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Environmental Awareness Module. This shall include the provision of adequate resources, an effective communication policy and systems of management review to effect continual improvement.Opportunities for improvement shall be identified, implemented and fully documented. |  |
| 1.2.1 | The company’s senior management shall determine environmental objectives in line with the company’s environmental management policy.The company’s environmental management objectives shall be specific, measurable, established, time-bound, documented, monitored and reviewed. They shall originate from the significant environmental impacts that were identified through the environmental hazard and risk management process. |  |
| 1.2.2 | The company’s senior management shall provide the human and financial resources required to implement the processes of the environmental management system. |  |
| 1.2.3 | Clear communication and reporting channels shall be in place to report on and monitor compliance with the Module. |  |
| 1.2.4 | The company shall ensure that the materials manufactured comply with the relevant environmental legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known. |  |
| 1.2.5 | The company’s senior management shall ensure that any non-conformities against the Module identified at the previous audit are effectively actioned |  |
| 1.2.6 | The company shall have a current and original copy of the Module available on site. |  |
| 1.2.7 | Where the company is certificated to the Module, it shall ensure that recertification audits occur on or before the audit due date indicated on the certificate. |  |
| 1.2.8 | All environmental documentation or permits required for legal operation of the site shall be maintained |  |
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| **1.3** | **Organisational structure, responsibilities and management authority** |
| SOI  | The company shall define the responsibilities, reporting relationships and job functions of those personnel who are involved in the management of environmental issues. |  |
| 1.3.1 | Withinthe management team there shall beadesignatedadequatelytrained and competent manager and deputy with the responsibility forcoordinating compliance with the requirements of the Module. |  |
| 1.3.2 | Documented and clearly defined responsibilities shall exist and be communicated to all key staff who are involved in environmental regulatory compliance and management systems. |  |
| 1.3.3 | There shall be appropriate documented arrangements in place to cover for the absence of key staff. |  |
| 1.3.4 | The company’s senior management shall ensure that a description of general duties or work instructions are in place and communicated to all those members of staff involved in activities relating to environmental regulatory compliance and management systems. |  |
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| **1.4** | **Management Review**  |
| SOI  | The company’s senior management shall ensure that a management review is undertaken to ensure that the environmental management programme is fully implemented, effective and is achieving the objectives set. |  |
| 1.4.1 | The review process for the company’s environmental management system shall assess the company’s performance against its own objectives and continual improvement targets, and shall include the evaluation of:* progress made on targets and objectives set since the implementation or last review of the environmental management system
* environmental incidents (defined in clause 3.3)
* customer requirements or changes in customer requirements
* changes in circumstances, such as legal or other statutory requirements
* additional opportunities for improvement identified since the last review.

The review process shall be undertaken at appropriate planned intervals, as a minimum annually, and records and action plans documented. |  |
| 1.4.2 | The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff and actions implemented within agreed timescales. |  |
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| **2**  | **Environmental aspect and impact management system** |
| **2.1** | **Energy Use**  |  |
| SOI  | All energy sources for production, processing and non-production activities and energy use shall be established and monitored. |  |
| 2.1.1 | The company shall maintain records of all energy used and identify the energy sources on its site. This may include, but is not limited to:* electricity
* gas or LPG
* fuel oil
* solar panels
* wind turbines
* any renewable energy source (e.g. energy produced as a by-product of processing).
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| 2.1.2 | Energy used in non-production activities (e.g. offices, staff facilities and warehousing) shall be included in site totals and be subject to suitable energy-use reduction and switch-off targets. |  |
| 2.1.3 | An effective ‘switch-off’ policy shall be developed where possible for all production and processing equipment and machinery on site and according to usage. |  |
| 2.1.4 | For equipment, operations or systems that have been identified as major users of energy, the company shall undertake a documented assessment to identify any potential changes that could reduce energy use. |  |
| 2.1.5 | Where energy-use reduction has been established as feasible, targets for reduction shall be established and reviewed on an (at least) annual basis. |  |
| 2.1.6 | The company shall identify all powered production or processing equipment and machinery that are major users of energy and the energy source for each. |  |
| 2.1.7 | The company shall ensure that compressed air systems are maintained to minimise compressed air leakage.A condition-based or preventive maintenance programme for compressed air systems and an equipment failure reporting procedure with a schedule for correction shall be in place. |  |
| 2.1.8 | A planned maintenance programme shall be developed and implemented for additional on-site equipment to ensure that it is operating at optimal efficiency. This may include, but is not limited to:* on-site boilers
* air-conditioning units
* emission abatement equipment
* refrigerant units.
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| **2.2** | **Raw Material Usage**  |  |
| SOI  | The company shall maximise the yield of raw materials to ensure that impact on the environment through wastage or excess material use is minimised. |  |
| 2.2.1 | The company shall identify and maintain records of all raw materials and intermediate goods that are used on site:* to make the final product
* in the production or processing of the final product or intermediate goods.
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| 2.2.2 | Of the raw materials and intermediate goods identified, the company shall determine:* which are from renewable and which are from non-renewable sources
* the recycled content
* whether the raw material is a by-product or an in-process recyclate.
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| 2.2.3 | Where a raw material is comprised of recycled or reused materials, the company shall determine where the material is sourced. |  |
| 2.2.4 | Through an assessment of possible process improvements, the potential to make a reduction in use of raw materials shall be evaluated and considered for implementation:* in the production and processing of the final product
* in the layout of the equipment and site.
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| 2.2.5 | If a reduction in the use of raw materials is feasible through process improvements, a schedule shall be developed to implement process and plant changes. |  |
| 2.2.6 | Based on risk assessment, a procedure shall be in place to address potential hazards to the environment from the raw materials during storage, manufacture and distribution activities, and to implement and maintain a system that will eliminate or reduce the identified risk. |  |
| 2.2.7 | Cleaning chemicals and materials shall be selected and used to minimise impact on the environment. |  |
| 2.2.8 | Where the company does not sub-contract their pest control programme, all pesticides and any other toxic pest control materials shall be purchased, used, stored and disposed of in a manner that complies with the company’s environmental and waste management objectives. |  |
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| **2.3** | **Water Use** |  |
| SOI  | The company shall monitor and effectively manage its water consumption to use available water sources responsibly, and to reduce its impact on the environment. |  |
| 2.3.1 | The company shall maintain records of mains supplied and abstracted water used on the site. Sources of water may include:* municipal sources (e.g. supplied by a water utility company)
* surface or ground water
* rainwater collected on the site
* recycled ‘grey water’.

Water consumption shall be monitored and compared between appropriately determined periods to identify volume and patterns of usage. |  |
| 2.3.2 | If water is sourced locally from surface water or groundwater, an evaluation shall be made to determine whether the water body is deemed to be particularly sensitive or vulnerable to such extractions.  |  |
| 2.3.3 | A register shall be developed to list any and all equipment that utilises water and the effect that the use has on the microbiological and chemical quality of the water. The company shall determine any mitigating activities that could be performed before the water is discharged to minimise any impact on the environment with regard to the requirements in clause 2.4 |  |
| 2.3.4 | Internal audits shall include an assessment of the water systems to determine whether wastage is occurring, and a condition-based maintenance programme and/or equipment failure reporting procedure with a schedule for correction shall be in place. |  |
| 2.3.5 | The company shall identify opportunities for water-use reduction, regardless of source, and appropriate targets for reduction shall be established and reviewed on an (at least) annual basis.Water used in non-production activities such as toilets or in non-production equipment and facilities cleaning shall be subject to appropriate water-use reduction targets. |  |
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| **2.4** | **Effluent and waste water**  |  |
| SOI  | Effluent and waste-water discharges shall be managed to remove or minimise the risk of harm to the environment or of accidents or incidents, and to reduce environmental impact. |  |
| 2.4.1 | The company shall determine and monitor the quantity of effluent and waste water produced on site and its intended disposition.This shall include reuse and planned and unplanned discharges associated with production operations. Domestic sewage shall be included only where no local regulatory or municipal controls exist. |  |
| 2.4.2 | The composition and temperature of the effluent discharge shall be determined and the content of grease, oils, solvents and any other foreign constituents shall be established and monitored at an appropriate frequency.Opportunities to remove process-related contamination and to control water temperature shall be identified and implemented. |  |
| 2.4.3 | Where the company has on-site water treatment plants, the company shall document what quantity of water is subject to treatment in this plant, and the purpose of this treatment.Appropriate controls over the treatment plant and a monitoring programme shall be in place.On-site treatment plants shall be subject to equipment implementation procedures and be included in the site’s maintenance and calibration programme. |  |
| 2.4.4 | Effluent discharge points shall be detailed on the site plan with the intended destination of the effluent. This may include discharge to surface water or municipal drains or sewers. |  |
| 2.4.5 | The company shall determine whether waste-water discharge can be reduced or eliminated (e.g. by reuse).Where waste-water discharge can be reduced, reused or removed, the company shall set achievable reduction objectives and review them on a regular basis. |  |
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| **2.5** | **Emissions to air**  |  |
| SOI  | Direct emissions (i.e. emissions from sources within the scope of Module certification, such as those from production buildings and transport) and their sources shall be managed to minimise or remove the risk of harm to the environment. |  |
| 2.5.1 | The company shall determine the quantity and types of emission produced as a result of processing and production activity on the site, including transport.This shall also include any greenhouse gases (GHGs) and ozone-depleting substances (ODSs) that may or may not be subject to local, national or international legislation or internationally agreed protocols, such as the Kyoto Protocol. |  |
| 2.5.2 | The assessment shall include the sources of each type of emission, including equipment, operations and site transport. |  |
| 2.5.3 | Where any abatement activities occur, these shall be listed and the total emissions affected established and monitored. |  |
| 2.5.4 | Through an assessment of possible process improvements, the potential to make a reduction in the production of emissions, including those subject to abatement activity, shall be evaluated and considered for implementation. |  |
| 2.5.5 | Achievable emissions reduction objectives shall be set and reviewed on a regular basis. |  |
| 2.5.6 | Emission abatement equipment shall be used in accordance with the manufacturer’s instructions and included in the site’s maintenance and calibration programme. |  |
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| **2.6** | **Transport, storage and distribution**  |  |
| SOI  | Activity for the movement and storage of raw materials, intermediate goods and finished products shall minimise impact on the environment. |  |
| 2.6.1 | Where the company dispatches intermediate or finished product by road, combining loads or groupage shall be considered where it poses no hazard to the finished product. |  |
| 2.6.2 | Optimal efficiency of company-owned vehicles shall be ensured through a maintenance programme. Topics to be considered include:* tyre inflation
* fuel consumption
* journey optimisation
* disposal of vehicle oil (if on site).

Driver training and typical mileage of vehicles shall be considered where applicable (e.g. eco-driving training). |  |
| 2.6.3 | The company shall evaluate its site transport needs to establish the optimal transport type for movement of raw materials, intermediate products and finished goods. |  |
| 2.6.4 | The company shall consider the potential to reduce dispatches or increase lorry loading (load efficiency) for all transport of raw materials, intermediate products and finished goods by company-owned and third-party contracted transport services. |  |
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| **2.7** | **Waste Management**  |  |
| SOI  | All waste produced by production and processing activity on site shall be subject to appropriate controls and monitoring. |  |
| 2.7.1 | The company shall determine and maintain records of:* production waste volumes
* composition of the waste
* intended disposition of the waste
* local legal requirements that apply to the waste materials.
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| 2.7.2 | Consideration shall be given to the waste hierarchy when disposing of production and non- production waste. The waste hierarchy is shown in Appendix 4. |  |
| 2.7.3 | The company shall minimise, with the intention to reduce to the point of elimination, production and non-production waste sent to landfill, and an objective (clause 1.2.1) shall be set. |  |
| 2.7.4 | Achievable waste reduction objectives shall be established and reviewed on a regular basis. |  |
| 2.7.5 | All waste produced at the site (production and non-production) shall be subject to a duty of care (e.g. containment on site, reduction, elimination, appropriate disposal with consideration for local legislation where relevant). |  |
| 2.7.6 | Where hazardous waste is produced, any specific legal or regulatory requirements associated with that type of waste shall be complied with. |  |
| 2.7.7 | Where possible, in-process recycling (such as regrind) shall be established and maintained to minimise wastage of raw materials or intermediate products.Where in-process recycling is not possible, the use of waste in other or alternative products, both in-house or with external sites, shall be evaluated and implemented if appropriate. |  |
| 2.7.8 | Spill waste shall be dealt with according to local legislative requirements, with special reference to hazardous waste (and shall include excess pest control materials). |  |
| 2.7.9 | The company shall ensure that waste or surplus pest control materials are managed effectively to minimise or eliminate hazards to the environment. |  |
| 2.7.10 | Where possible, any and all pests killed by ingestion of toxic materials, traps or any other pest control method shall be disposed of to minimise the risk of contamination to the environment. |  |
| 2.7.11 | Chemicals including cleaning materials, lubricants and adhesives shall be purchased, used, stored and disposed of in a manner that complies with the company’s environmental and waste management objectives. |  |
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| **2.8** | **Land Use**  |  |
| SOI  | The use of land and the potential impact on the local environment shall be with consideration to the company’s environmental policy and objectives. |  |
| 2.8.1 | Where new buildings are being commissioned, the company shall ensure that the build process does not cause negative impact on the local environment, and the buildings shall comply with the company’s environmental policy, objectives and local legal requirements.Where relevant, consideration shall be made for use of sustainable building schemes that incorporate the use of sustainable design and renewable energy, such as BREEAM (Building Research Establishment Environmental Assessment Method). |  |
| 2.8.2 | The purchase, installation and commissioning of equipment, and the movement or decommissioning of old equipment or facilities, shall be conducted with consideration of the company’s environmental policy. |  |
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| **2.9** | **Nuisance**  |  |
| SOI  | The site shall take steps to minimise risk of nuisance. |  |
| 2.9.1 | A documented assessment of the site’s interaction with its local environment and the potential negative impacts shall be conducted. This may include, but is not limited to:* noise sources
* site activity and hours of operation
* staff arrival times
* odour
* emissions to air, water and land
* storage of raw materials, intermediate products and waste materials.
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| 2.9.2 | The company shall take steps to eliminate or mitigate the nuisance where significant impact on the local environment has been identified. |  |
| 2.9.3 | Where external storage of raw materials, intermediate products or finished goods is necessary, the areas shall be suitably designated and maintained to ensure that the products do not pose a hazard or nuisance to the local environment. This may include detritus removed by winds or rain, or harbourage of pests. |  |
| 2.9.4 | The company shall ensure that ventilation does not cause environmental impacts on the surrounding area, such as nuisance from odour, dust or noise. |  |
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| **3** | **Pollution and incident identification and management system** |
| **3.1** | **Pollution prevention team** |  |
| SOI  | A multidisciplinary environmental risk management team shall be in place to develop and manage the pollution and incident identification and management system and to ensure that it is fully implemented. |  |
| 3.1.1 | The pollution and incident identification and management system shall be developed, reviewed and managed by a multidisciplinary team that includes those responsible for facilities management, production, technical, engineering/maintenance and other relevant functions.In the event that the company does not have the appropriate expertise in hazard and risk analysis in house, external expertise shall be sought and used to develop and review the system. However, the day-to-day management of the system shall remain the responsibility of the company. |  |
| 3.1.2 | The multidisciplinary team shall have a designated team leader who shall be able to demonstrate competence and experience of hazard and risk analysis and an appropriate understanding of environmental management. |  |
| 3.1.3 | The team shall be suitably trained in hazard and risk analysis principles and kept up to date with factory and site changes as they occur. |  |
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| **3.2** | **Pollution and incident identification and management through hazard and risk analysis** |
| SOI  | A formal environmental hazard and risk analysis system shall be in place to ensure that all potential hazards to the environment from site activity and operations are identified and that appropriate controls are established. |  |
| 3.2.1 | The scope of the environmental hazard and risk analysis system shall be clearly defined and cover all activity, operations and processes that occur on site. |  |
| 3.2.2 | The environmental hazard and risk analysis team shall maintain awareness of and take into account:* historical and known hazards associated with the site
* specific processes, raw materials or operations or activities that occur on the site
* relevant codes of practice or recognised guidelines
* legislative requirements.
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| 3.2.3  | A full description of the site shall be developed, which includes all relevant information on the buildings and activities that occur on site. As a guide this may include:* total size of the site, including external grounds
* nature and situation of the site (whether it is in a rural, urban or industrial setting)
* number and types of building on site, including any unused outbuildings
* all activities that take place in each building
* sensitive environmental areas (land, air and water) unique to the site that may be affected by accidental discharges.
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| 3.2.4 | A site plan listing manufacturing operations, activities, and inputs and outputs to each building or site area shall be prepared. This shall include:* energy and energy types
* water
* fuel and fuel types
* raw materials.

The accuracy of the plan shall be verified by the hazard and risk analysis team. |  |
| 3.2.5 | The environmental hazard and risk analysis team shall identify and record all potential hazards or incidents that are reasonably expected to occur on site, including manufacturing, processing and storage areas, and external areas such as lorry parks. The hazards considered shall include, where relevant:* leakage from damage or wear and tear of systems
* accidental release of fluids such as oil, diesel or effluent to the site
* compliance with legal requirements.
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| 3.2.6 | Where appropriate and permitted by local, national or international legislation, the company shall:* establish monitoring procedures for the identification of hazard occurrence
* introduce control measures to minimise the risk of occurrence
* set limits for those potential hazards.
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| 3.2.7 | Liquid spillages of any type shall not enter surface water drainage. A spill response procedure shall be available that includes appropriate training, and shall be reflected in the incident management procedures and log. |  |
| 3.2.8 | Where glass breakage occurs, the responsible person shall ensure that the waste caused by the breakage of glass or brittle plastic, including materials used in the clean-up operation or any product that has been contaminated, are disposed of in a method that complies with the company’s environmental and waste management objectives. |  |
| 3.2.9 | A review of the environmental hazard and risk analysis system shall be carried out at least once a year and/or following any significant incidents or changes made to the site, activities and processes, or buildings.The review shall include a verification that the environmental hazard and risk analysis system is effective and may include consideration of:* complaints (e.g. from neighbours)
* incidents (e.g. spillages or accidental discharges to air, land or water)
* results of internal audits of environmental programmes
* results from external third-party auditors
* any third-party actions or investigations and activities or public identifications of issues
* results of visits from any regulatory authorities
* any environmental initiatives that have been implemented by the site.
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| **3.3** | **Environmental Incident management**  |  |
| SOI  | The site shall have a plan and systems in place to manage environmental incidents effectively. |  |
| 3.3.1 | The occurrence of a hazard beyond the limits set in clause 3.2.6 shall constitute an environmental incident. The occurrence of environmental incidents shall be recorded. |  |
| 3.3.2 | An environmental incident management procedure shall be documented, be practical to implement and be regularly reviewed. This shall include as a minimum:* identification of the key personnel involved in assessing environmental incidents with clearly identified responsibilities
* a communications plan including methods of informing customers and, where necessary, regulatory bodies, in a timely manner
* corrective action and business recovery
* a review of any incidents to implement appropriate improvements as required.
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| 3.3.3 | The corrective action that should be taken when the company has identified the occurrence of an environmental incident shall be established and documented.This shall include the procedures for managing impacts on the environment where hazards have occurred and the containment, mitigation and procedures required to minimise the effect or potential effect on the environment. The documentation shall include the potential impacts on the physical environment in proximity to the site but not in the company’s control. |  |
| 3.3.4 | The environmental incident management procedure shall be operable at any time. |  |
| 3.3.5 | The environmental hazard and risk management team shall be responsible for ensuring that preventive action is taken (based on a review of incidents) and that improvements are implemented as necessary. |  |
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| **4** | **Environemtal Management System**  |  |
| **4.1** | **Environmental management manual**  |  |
| SOI  | The company shall have a manual which describes how the requirements of the Module are met. |  |
| 4.1.1 | These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary. |  |
| 4.1.2 | The environmental awareness manual shall contain an outline of working methods and practices or references to where such an outline is documented. |  |
| 4.1.3 | The manual or relevant components shall be readily available to key staff. |  |
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| **4.2** | **Internal audits**  |  |
| SOI  | The company shall audit those systems and procedures which cover the requirements of the Module to ensure that they are in place, appropriate and complied with. |  |
| 4.2.1 | Internal audits shall be planned and their scope and frequency shall be established. Audits shall be scheduled so that all aspects of the Module are audited at least annually. |  |
| 4.2.2 | Internal audits shall be carried out by appropriately trained and competent auditors, who are independent from the audited activity. |  |
| 4.2.3 | Deficiencies and details of non-conformities shall be notified to the relevant supervisory staff and corrective action implemented within a specified and appropriate time period. |  |
| 4.2.4 | The company shall identify whether deficiencies and non-conformities have any legal ramifications, and whether hazards to the environment caused are within the scope of the Module. Where the environment is or may be compromised, corrective and remedial actions shall be taken to mitigate the impacts on the environment.These actions shall be reflected in the environmental aspect and impact management system (requirement 2), and the pollution and incident identification and management system (requirement 3). |  |
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| **4.3** | **Documentation control**  |  |
| SOI  | The company’s senior management team shall ensure that documented procedures and recording forms related to the environmental policy and objectives of the company and the nature of its products are in place and effectively controlled. |  |
| 4.3.1 | All documents in use shall be properly authorised and be the current version. |  |
| 4.3.2  | Documents shall be clearly legible, unambiguous and sufficiently detailed to enable their correct application by appropriate personnel. They shall be readily accessible to relevant staff at all times. |  |
| 4.3.3 | All changes and amendments to documents regarding environmental management system procedures shall be authorised and recorded, and obsolete documentation shall be removed, archived and replaced with the current version. |  |
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| **4.4** | **Specifications**  |  |
| SOI  | The company shall ensure that specifications for the raw materials brought on site contain the source, supplier, constituent parts and any relevant chain-of-custody information regarding the raw material. |  |
| 4.4.1 | The company shall ensure that specifications for intermediate and finished products sold to a customer contain any relevant chain-of-custody information of the raw material. |  |
| 4.4.2 | Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant environmental legislation in the country of manufacture. |  |
| 4.4.3 | The company shall operate a specification review procedure to ensure that data concerning source, supplier, constituent parts and any relevant chain-of-custody information for raw materials, and intermediate and finished products, is accurate and up to date. |  |
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| **4.5** | **Record keeping**  |  |
| SOI  | The company shall maintain records to demonstrate the effective control of its site with regard to the Environmental Awareness Module. |  |
| 4.5.1 | The records shall be legible, genuine, appropriately authorised and retained in good condition for a defined time period with consideration given to any legal or customer requirements and to the shelf life of the product or usage of the packaging materials.Any alterations to records shall be authorised and justification for the alteration shall be recorded. |  |
| 4.5.2 | Where records are in electronic form, these shall be suitably backed up to prevent loss. |  |
| 4.5.3 | The company’s senior management team shall ensure that procedures are operated for the organisation, review, maintenance, storage and retrieval of all records relating to the Module. |  |
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| **4.6** | **Complaint handling**  |  |
| SOI  | The company shall have a system for the effective capture, recording and management of complaints regarding the environmental performance of the site. |  |
| 4.6.1 | All complaints shall be recorded, investigated and the results of the investigation documented. |  |
| 4.6.2 | Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by suitably trained staff. |  |
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| **5** | **Personnel**  |  |
| **5.1** | **Training and competence**  |  |
| SOI  | All personnel, including temporary personnel, shall be appropriately trained on the company’s environmental objectives prior to commencing work.  |  |
| 5.1.1 | Personnel shall be trained on the requirements of the Module and the company’s environmental policy. |  |
| 5.1.2 | Records of training on the requirements of the Module shall be kept for all current and recent key employees.The company shall routinely review the competencies and environmental awareness of staff and provide refresher training as appropriate. |  |
| Comments  |
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| **5.2** | **Access and movement of personnel**  |  |
| SOI  | The company shall ensure that access and movement of personnel, visitors and contractors shall be in line with the company’s environmental objectives. |  |
| 5.2.1 | The company shall document site traffic routes and identify routes that minimise impact on the environment. This shall include, but is not limited to:* how employees arrive on site
* how raw materials and intermediate goods arrive or are dispatched
* routes for transport of raw materials and intermediate and finished products around the site (e.g. by hand or motorised trucks).

Where possible, the company’s objectives with regard to environmental awareness shall include minimisation of impact on the environment from the above. |  |
| Comments  |
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| **5.3** | **PROTECTIVE CLOTHING** |  |
| SOI  | The use and disposal of protective clothing shall not compromise the environmental objectives of the company. |  |
| 5.3.1 | Where disposable protective clothing is used, the company shall ensure that its disposal is in line with its environmental objectives and with the waste hierarchy (see Appendix 4). |  |
| 5.3.2 | Where protective clothing is laundered either by a professional laundry service, in-house, or in controlled laundering facilities, the company shall ensure that the equipment, materials and detergents used are compliant with its environmental objectives.Where protective clothing is laundered by self-care, guidance shall be offered to personnel for the minimisation of impact on the environment. |  |
| Comments  |
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