

Qudos/Documents/Master Documents List/ Environmental Management System Manual

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ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

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1.0 INTRODUCTION

1.1 Company Profile

WA Limestone is a local (Perth based) family business specialising in construction materials supply and construction. The WA Limestone group of companies includes:

WA Limestone (established 1975)
WA Bluemetal (established 1999)
WA Premix (established (2003)

In September 2011 WA Limestone was awarded the Cement Concrete and Aggregates Association's (CCAA) WA Environmental Health and Safety 2011, Environmental Best Performance Extractive Award. This award was in recognition of WA Limestone's innovative environmental management of their Flynn Drive limestone quarry, at Neerabup.

The Southern Gateway Alliance of which WA Limestone is a member received the 2010 Civil Contractors Federation (CCF) National Earth Award (Category 5).

WA Limestone is a member of the following industry organizations:

- Chamber of Commerce & Industry,
- Civil Contractors Federation
- Quarrying Institute of Australia
- Cement Concrete and Aggregates Association
- Sand Producers Association of Western Australia

1.2 Purpose of this Manual

This Manual defines the Environmental Management System (EMS) of WA Limestone's activities and contains:

Statements of responsibility and authority;

- (a) An overview of the company's environmental procedures and controls;
- (b) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- (c) The appointment of the Environmental Management Representative (EMR); and
- (d) The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this EMS meets all *ISO 14001:2004* requirements and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

1.3 Scope of EMS

The EMS of WA Limestone is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS is established in accordance with *ISO* 14001:2004, and is described in this section.



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2.0 ENVIRONMENTAL MANAGEMENT FRAMEWORK

2.1 Environmental Policy and Commitments

(ISO 14001 Standard Clause 4.2)

The *Environmental Policy* outlines the environmental commitments of WA Limestone with respect to its operations, activities, and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of WA Limestone activities, products and services has been considered. The policy is endorsed by the Board of Directors and the policy shall be reviewed during the management review meetings.

The policy shall stipulate the commitments of WA Limestone to continually improve its environmental management and prevention of pollution. WA Limestone is also committed to comply with applicable legal requirements and other requirements to which WA Limestone subscribes, which relate to its environmental aspects. The *Environmental Policy* shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented and communicated to all employees of WA Limestone and its contractors.

This policy shall be available to the public.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Environmental Policy

3.0 PLANNING

3.1 Environmental Aspects and Impacts

(ISO 14001 Standard Clause 4.3.1)

The identification of environmental aspects and impacts through environmental risk assessments will be used by WA Limestone to ensure potential environmental impacts, both detrimental and beneficial are identified, assessed and appropriately managed.

A risk assessment procedure has been developed to identify the environmental aspects of its activities, products or services that WA Limestone can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are recorded in the *Impacts and Aspects Register*.

The key points of this process include:

- Completion of a project wide environmental risk assessment prior to the commencement of the operational phase of the project. And renewal of this assessment at least annually;
- Maintenance of a register of environmental aspects and impacts for all sites and projects. The register is to be reviewed at least annually and tracked on an on-going basis; and



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 Completion of task-specific risk assessments for any new task or other significant project change not specifically covered by the project wide assessment.

Relevant documents:

QUDOS: Documents/ Master Document List/ Environmental Aspects and Impacts Register

3.2 Legal and Other Requirements

(ISO 14001 Standard Clause 4.3.2)

WA Limestone shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects

WA Limestone shall identify all relevant regulations, codes of practice, guidelines and conditions of operation that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Commitments Requirements.

WA Limestone shall keep this information up-to-date.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Legal and Other Requirements Procedure

QUDOS: Documents/ Master Document List/ Legal and Other Requirements Register

3.3 Objectives, Targets and Programme(s)

(ISO 14001 Standard Clause 4.3.3)

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within WA Limestone. Programmes are established, implemented and maintained for achieving its objectives and targets and documented in the *Continual Improvement Plan*.

The Board of Directors shall approve the *Environment Objectives and Targets* proposed by the Environmental Manager (EM) before implementation. The EM shall ensure that the objectives and targets are measurable where practicable, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets shall be reviewed quarterly by the EM. The EM shall revise the *Environment Objectives and Targets* as necessary.

WA Limestone shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EM shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.



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Obsolete objectives, targets and programmes shall be maintained as an EMS record for a minimum of three years.

3.3.1 Objective(s)

Objectives are the overall environmental goals that WA Limestone sets to achieve. When establishing and reviewing its objectives, WA Limestone shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

3.3.2 Target(s)

Targets are the set of measurable performance requirements that WA Limestone establishes to achieve the defined objectives.

3.3.3 Programme(s)

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

Relevant document(s):

QUDOS: Documents/Master Document List/ Objectives Planning Procedure

4.0 IMPLEMENTATION AND OPERATION

The implementation of the EMS requires WA Limestone to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

4.1.1 Environmental Manager

The Environment Manager has the responsibility and authority for:

- a) ensuring the EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard;
- b) maintaining awareness of the environmental legislative requirements associated with WA Limestone's sites and operations and take measures to ensure compliance;
- c) regularly reviewing the policy and the effectiveness of the EMS, and ensuring that the necessary changes are made; and
- d) liaison with regulatory authorities and the community in relation to environmental matters.



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The EM has the responsibility and authority to:

- a) Establish and implement the EMS according to the ISO 14001 standard, and monitoring the performance of the EMS;
- b) coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained;
- c) handling and investigating nonconformity and ensuring corrective and preventative action has been taken to mitigate any impacts caused; and
- d) reporting on the performance of the EMS to the Board of Directors for review and as a basis for improvement of the EMS.

4.1.2 Environmental Management Representative (EMR)

The Environment Officer is the appointed EMR and has the responsibility and authority for:

- a) assisting the EM to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard;
- b) assuming the responsibility and action of the EM when the EM is unavailable.

4.1.3 Managers / Supervisors

Managers / Supervisors are responsible for:

- a) ensuring all operations under their supervision are undertaken in accordance with the environmental policy and EMS.
- b) establishing controls for the identified significant environmental aspects for their function team / department according to procedures and instructions;
- c) ensuring all employees and contractors under their supervision are appropriately trained and informed regarding their environmental responsibilities:

4.1.4 All Employees

All employees are responsible for:

- a) working in accordance with the environmental policy and EMS:
- b) being responsible and accountable for the environmental impact of the work they perform; and
- c) reporting problems or deviations associated with environmental issues and the EMS to their supervisor.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Organisation Chart

4.2 Competence, Training and Awareness

(ISO 14001 Standard Clause 4.4.2)

WA Limestone shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.



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WA Limestone will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

WA Limestone shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental management system;
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;
- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures;

Relevant document(s):

QUDOS: Documents/ Master Documents List/ *Training Procedure* QUDOS: Documents/ Master Documents List/ *WA Group Matrix*

4.3 Communication

(ISO 14001 Standard Clause 4.4.3)

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees.

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of WA Limestone shall inform their manager. The designated member of the EMS Committee representing each division shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy is available at WA Limestone head office and the company web page. All internal and external enquiries / communications shall be discussed and reviewed during the EMS Committee meeting and the decision shall be recorded on meeting minutes.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g. publish environmental report.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Handling Complaints Procedure



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4.4 Documentation

(ISO 14001 Standard Clause 4.4.4)

The Environmental Management System documentation encompasses four levels as described below:

The first level is the *Environmental Management System Manual* (this document) which includes WA Limestone's *Environmental Policy* (specifying the principal objectives and environmental commitments of WA Limestone), and a broad description of how WA Limestone addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between WA Limestone's EMS and the ISO 14001 Standard. An *Environment Health and Safety Objectives and Targets Procedure* is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continuous improvement in environmental performance.

- a) The second level is the *Environmental Procedures (EPs)*, which include all procedures that WA Limestone shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when.
- b) The third level is the *Environmental Instructions (Els)*, which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with WA Limestone's operations and activities.
- c) The fourth level is *Environmental Records*, *which* arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Environmental Management System Manual

QUDOS: Documents/ Master Document List/ Environmental Policy

QUDOS: Documents/Master Document List/ Objectives Planning Procedure QUDOS: Documents/ Master Document List/Controlled Records Procedure

4.5 Control of Documents

(ISO 14001 Standard Clause 4.4.5)

The essences of EMS documentation controls are:

- (a) they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- (b) that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- (c) that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- (d) obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- (e) any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.



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WA Limestone shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. WA Limestone shall establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

Relevant document(s):

QUDOS: Master Document List: Records Management Procedure

4.6 Operational Control

(ISO 14001 Standard Clause 4.4.6)

WA Limestone shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

WA Limestone shall ensure that all operations and activities, carried out by WA Limestone's employees or contractors that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. WA Limestone shall influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

Relevant document(s):

QUDOS: Documents/Master Document List/ Environmental Policy

QUDOS: Documents/ Master Document List/ Records Management Procedure

QUDOS: Documents/ Master Document List/ Environmental Workplace Inspection Checklists;

Concrete Plants; Quarries; Work shop; Office

4.7 Emergency Preparedness and Response

(ISO 14001 Standard Clause 4.4.7)

WA Limestone shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

WA Limestone shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

WA Limestone shall also periodically test the procedure and the preparedness where practicable.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Environmental Aspects and Impacts Register

QUDOS: Documents/ Master Document List/ Emergency Response Plan



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5.0 CHECKING

While implementing the EMS, WA Limestone shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

5.1 Monitoring and Measurement

(ISO 14001 Standard Clause 4.5.1)

WA Limestone shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

Relevant document(s):

QUDOS: Documents/ Master Documents List/ Environmental Monitoring Procedure

5.2 Evaluation of Compliance

(ISO 14001 Standard Clause 4.5.2)

To meet the company's commitment to compliance, WA Limestone shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements (ISO 14001 section 4.5.2.1) and other requirements (ISO 14001 section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

Relevant document(s):

QUDOS: Documents/ Master Documents List/ Environmental Monitoring Procedure

5.3 Nonconformity, Corrective Action and Preventative Action

(ISO 14001 Standard Clause 4.5.3)

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, WA Limestone shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- handle and investigate nonconformity;
- · take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;



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 implement and record any changes in the documented procedures resulting from corrective and preventive action; and

WA Limestone shall also ensure that any necessary changes are made to environmental management documentation.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Incident Reporting Procedure

QUDOS: Documents/ Master Document List/ Records Management Procedure

QUDOS: Documents/ Master Document List/ Handling Complaints Safety and Environment

Procedure

QUDOS: Documents/ Master Document List/ Corrective Action Procedure QUDOS: Documents/ Master Document List/ Preventive Action Procedure

5.4 Control of Records

(ISO 14001 Standard Clause 4.5.4)

Records shall be maintained on Qudos to keep track of WA Limestone's environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard, and the results achieved.

Relevant document(s):

QUDOS: Documents/ Master Document List/ Records Management Procedure

5.5 Internal Audits

(ISO 14001 Standard Clause 4.5.5)

WA Limestone shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- a) determine whether or not the environmental management system:
 - i) conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
 - ii) has been properly implemented and maintained;
- b) provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

WA Limestone shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.



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Relevant document(s):

QUDOS: Documents/ Master Document List/ Environmental Workplace Checklist- Quarries

QUDOS: Documents/ Master Document List/ Environmental Workplace Checklist- Concrete Plants

QUDOS: Documents/ Master Document List/ Environmental Workplace Checklist- Work Shop

QUDOS: Documents/ Master Document List/ Environmental Workplace Checklist- Office

5.6 Management Review

(ISO 14001 Standard Clause 4.6)

WA Limestone board of directors s review the EMS periodically to ensure its suitability, adequacy and effectiveness.

Before the review, the EM shall schedule for the management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The Board of Directors, EM shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, business activities, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- review of the Environmental Policy and Objectives and Targets;
- review of legal compliance and compliance with other requirements (including contractor compliance on WA Limestone's activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;
- review of nonconformities and the status of corrective/preventive actions;
- communications from external interested parties, including complaints;
- areas for improvement with respect to environmental performance:
- adequacy of emergency preparedness and response;
- changing circumstances, including developments in legal and other requirements related to its environmental aspects:
- identify the need for modification of the existing EMS in light of the above items; and
- follow-up action from previous management reviews.

The review shall initiate a new improvements in WA Limestone's environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record.

Relevant document(s):

QUDOS: Documents/Master Document List/ Environmental Policy

QUDOS: Documents/Master Document List/ Objectives and Planning Procedure