CREATING TELECOMMUNICATIONS

visionstream

Environmental Management System Overview

VS-EN-PLN-002

ISSUE: **5**

DATE: **September 2014**

PREPARED:
Name: Claire Donohue   Signed: _____
SHE Advisor
Date: _18/09/14_

REVIEWED:
Name: Kynan Ford   Signed: _____
SHE Manager
Date: _18/9/14_

APPROVED:
Name: John Britto   Signed: _____
Manager – Systems &
Compliance
Date: _18/9/14_

DOCUMENT CONTROL & NOTIFICATION LIST

Contact for Enquires and Proposed Changes

If you have any questions regarding this document, please contact:

Name: Kynan Ford
Designation: SHE Manager
Phone: (03) 9258 5785
Fax: (03) 9563 8749
Email: kynan.ford@visionstream.com.au

If you have a suggestion for improving this document, complete and forward a copy of Change Request (VS-QM-FRM-001).

Document Control

AMENDMENT	DATE	PAGE	DESCRIPTION	AUTHORISED
Issue 1	June 2003	All	Initial issue	John Britto
Issue 2	19/05/06	All	Added LSE Logo, referenced LSE	John Britto
Issue 3	20/09/11		General Review	John Britto
Issue 4	28/05/12	6	Update reference to policy	John Britto
Issue 5	1/9/14	All	Update reference to new EIs, update logos and positions and general review	John Britto

Notification / Distribution List

(Completion of this Section is mandatory for document release)

Job Title	Section/Group	Name
All Employees	All Locations	

The above notification list is a minimum controlled distribution and it is the responsibility of the persons receiving the notification to further notify other Company personnel within their area if required.

TABLE OF CONTENTS

1   PURPOSE

The Company has a commitment to our employees, customers, suppliers and the community in general to manage our environmental impact and improve our operations on a continual basis. This document has been compiled to outline:

- The way in which the Company manages the environmental impact of its activities,
- Compliance to the ISO 14001 standard
- A defined process for continual improvement.

2   SCOPE

This document outlines Visionstream's compliance with the requirements of ISO 14001 Environmental Management System Standard and provides links, where necessary, to other sections of the Company's Management System.

The scope of the document covers the following key elements;

- Environmental Policy
- Planning
- Implementation
- Checking / Corrective Action
- Management Review

3   DEFINITIONS & ABBREVIATION

3.1   Definitions

Company – means Visionstream Pty Ltd

Environmental aspect - An element of an organisation's activities, products or services that may 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.

Environmental objectives - overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.

Environmental targets - detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

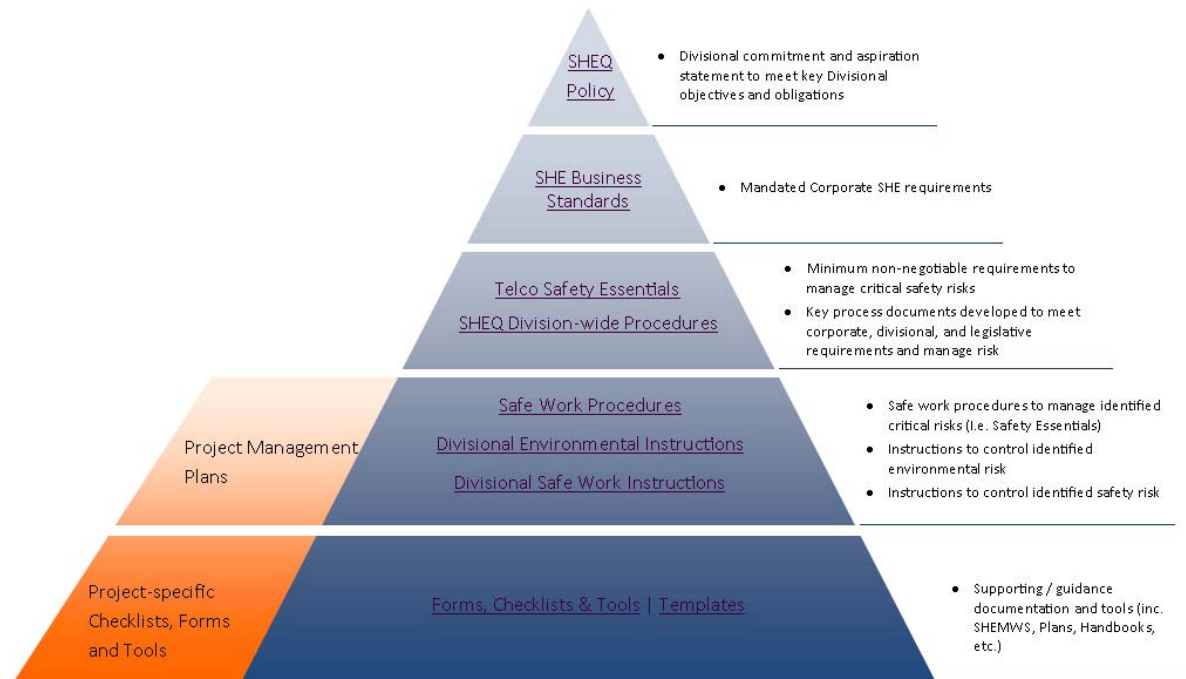### 3.2   Abbreviations

EMS	Environmental Management System
NCR	Non-conformance Report
OHS&E	Occupational Health, Safety & Environment
SEQ	Safety, Environment & Quality
SHE	Safety, Health & Environment

4   REFERENCES

AS/NZ ISO 14001 Environmental Management Systems – Requirements with guidance for use.

5   DESCRIPTION

5.1   Environmental Management System Framework

The Company has an integrated safety, environment and quality management system, which is referred to as the *National Management System*.

The system incorporates a range of objectives and targets, which are designed to facilitate environmental management in the workplace. The current version of all procedures and forms referenced in this document are available on the Company Intranet.

5.1.1   Values & Behaviours

One of the Company's values and priorities is "**Respect for the community and the environment**".

Visionstream is committed to Environmental sustainability: striving to balance economic and operational requirements with social responsibility to minimise the impact on the environment and surrounding communities.

Guiding behaviours have been developed to underpin our values and the way we work. All employees and contractors are made aware of these values as part of the project induction and are encouraged to "live" the values through behaviours demonstrated.

Visionstream Behaviours are:

Acknowledge that we are guests in the community

- Behave as if it's your home
- Minimise inconvenience
- Be proud of what we leave behind

Respectfully and actively engage with and enhance our communities

- Care about other people

- Listen and act on local needs

- Get involved in community initiatives

Continually look for opportunities for positive Environmental outcomes

- Go beyond mandatory compliance

- Do more, using less

- Think of future generations

5.1.2 Environmental Policy

The Company's Safety, Health, Environment & Quality Policy highlights, outlines and demonstrates senior management commitment to the Environment. It is a statement signed by the Company's General Manager and is the primary policy document for the Company (VS-QMM-001)

The Safety Health, Environment and Quality policy is appropriate to the nature, scale and environmental impacts of the company's activities, products and services and includes a commitment to continual improvement and prevention of pollution.

The policy outlines Visionstream's commitment to comply with legal and other requirements related to identified environmental aspects and also provides the framework for setting and reviewing environmental objectives and targets.

The Safety, Health, Environment & Quality Policy VS-QMM-001 can be found on the Company's Intranet and copies are displayed in all offices, where it is readily accessible to all employees, contractors, clients and members of the public.

Referred Documents	Document Number
Safety, Health, Environment & Quality Policy	VS-QMM-001
Sustainability Policy	VS-QMM-019
Sustainable Procurement Policy	VS-QMM-020

5.1.3 Sustainability Policy

The Company has also developed a specific Sustainability Policy to assist us in achieving our sustainability objective of creating a sustainable future. To achieve this we have committed to undertake the following:

- Promote a culture of sustainable behaviours in environment, procurement, health, safety and wellbeing, corporate investment and customer satisfaction in line with Company policies and directions.
- Promote the efficient use of energy, water, products and services, reduction of waste diverted to landfill and reduction of greenhouse gas emissions through-out business activities.
- Implement technologies that will reduce greenhouse gas emissions, support better work-life balance, improve customer satisfaction, and have a positive impact on health, safety and wellbeing
- Meet or exceed relevant legislation and other criteria to which we subscribe
- Regularly review and continually improve our sustainability performance
- Where possible purchase products and services that have a positive or low negative social and environmental impact and consider the full lifecycle of those products and services.
- Communicate, educate and lead sustainable initiatives, programs and practices

- Ensure our activities do not have a negative impact on communities, the environment, and our people.

5.1.4 Sustainable Procurement Policy

The Company has developed a Sustainable Procurement Policy which commits the Company to reducing the environmental and social impacts associated with the purchase, lease or hire of products and service procured by Visionstream. This policy commits the Company to establishing a framework for setting sustainable procurement objectives and targets within our business. These include:

- Identify products and services that have significant adverse environmental and/or social impacts and identify opportunities for minimising and/or mitigating those impacts.
- Consider the full lifecycle of products and services in purchasing decisions.
- Purchase, hire or lease products and services that have a positive or low negative environmental and social impact that perform satisfactory and are available at a competitive price.
- Review current practices to ensure suppliers of high risk products and services have an Environmental Management System certified to ISO 14001 and an OHS Management System certified to AS 4801 or equivalent.
- Subscribe to appropriate sustainable purchasing memberships and commit to fulfilling all associated requirements.
- Research, develop, implement and continually review a Sustainable Procurement Strategic Framework outlining targets and timeframes.
- Communicate, educate and lead sustainable initiatives, programs and practices focusing on sustainable procurement.
- All managers, supervisors and staff are responsible for the achievement of the goals set out in this policy.

The policies are reviewed periodically to ensure that they remain relevant and appropriate to the Company's environmental risks.

5.1.5 SHE Business Standards

The Company's SHE Business Standards contain the guiding principles which have been developed in terms of context, application, minimum requirements and key accountabilities. The standards are:

Standard #	SHE Business Standard Title
1	SHE Leadership and Commitment
2	SHE Planning and Performance Indicators
3	SHE Communication and Consultation
4	SHE Hazard Identification Risk Assessment and Control
5	SHE Responsibility and Authority
6	SHE Considerations for New Projects
7	Capability, Integrity and Operation of Plant and Equipment
8	Contractors and Suppliers
9	Management of Hazardous Material and Dangerous Goods
10	Training and Competence
11	Occupational Health and Hygiene
12	Emergency Preparedness and Response
13	Incident Management

| 14 | SHE Performance Monitoring, Measurement and Reporting |
| 15 | SHE Reviews, Audits, Inspections and Corrective Actions |

These standards are formally audited at a Group and Divisional level and are stored on the Company's Intranet.

5.2   Planning

5.2.1   Environmental Management Program

Environmental Management Planning is conducted at a Corporate and Project Level. At a corporate level the Environmental Program is documented:

Referred Documents	Document Number
SHE Strategy Plan	NA

At a Project Level, the Environmental Program is documented in the Project Management Plan or in a project-specific Environmental Management Plan and is managed through the Risk Assessment and Control Process.

5.2.2   Environment Objectives and Targets

The Company's key environmental objective is to balance the economic, environmental and social responsibilities to minimise environmental impact of all the Company activities.

The Company has the utmost respect for the environment, and is continually looking for opportunities that provide positive environmental outcomes.

The following table provides detail about the environmental objectives measured and monitored by the Company.

Element	Details of Objectives / Targets
ISO 14001 Compliance	**Objective 1:** Maintain ISO 14001 3rd party environmental certification. **Target 1:** No NCRs raised by 3rd Party Certifier. **Target 2:** Implement an Environmental Management Plan at all projects / workplaces.
Environmental Compliance	**Objective 2:** Compliance with Legislative, Regulatory, Licence or Permit Requirements **Target 1:** Zero fines or prosecutions. **Target 2:** No breaches of project / workplace environmental conditions.
Risk Management	**Objective 3:** Each project to undertake an environmental risk assessment to establish environmental aspects and impacts as part of developing a Project Management Plan. Risk mitigation strategies are to be documented, implemented and used. **Target 1:** Risk assessment completed and documented. **Target:** Risk assessments to be periodically reviewed at defined intervals or after a significant environmental incident.
Environmental Incidents	**Objective 4:** Create project awareness strategies to minimise environmental harm and its impact on both the project area and the surrounding environment. **Target 1:** All environmental incidents are to be recorded using the company environmental incidents classification criteria. **Target 2:** No Level (class) 1 (most severe) incidents. **Target 3:** Environmental Incident Frequency Rate (EIFR) to be < 1 based on Level (class) 1 and Level (class) 2 incidents.
Communication	**Objective 5:** Maintain a documented register of complaints received about

Element	Details of Objectives / Targets
	environmental performance from internal or external stakeholders and record actions taken and status.
Environmental Awareness	**Objective 6:** All projects to conduct formal induction to ensure personnel awareness of environmental issues, risks and procedures.
	Target 1: Each induction to include regulatory and project specific environmental information (including environmental procedures and work practices).
	Target 2: All personnel who work on the project (other than day visitors) to receive induction.
Environmental Auditing	**Objective 7:** Environmental audits to be conducted on all Visionstream projects.
	Target 1: All projects to have planned and conducted a periodical internal environmental audit(s).
	Target 2: Report all external audits and significant NCR's.

Targets are set as part of the business planning process and documented in the business plan, Visionstream SHE Strategy Plan and other relevant functional plan.

Environmental KPI's are set in accordance with the SHE Strategic Plan

5.2.3   Environmental Aspects and Impacts

Every project is required to identify potential environmental aspects and impacts prior to commencement of any construction works. At a Project Level, the Environmental Planning is documented in the Project Management Plan and is managed through the Risk Assessment and Control Process.

The Company has documented its methodology to reduce environmental impacts through hazard identification, risk assessment and development of risk control measures in accordance with the "hierarchy of control" and legal requirements.

The procedure for the identification, assessment & control of environmental hazards is:

Referred Documents	Document Number
Risk Management	VS-RM-PRC-001

The Company's SHE risk management framework requires SHE risks to be managed to all levels of operation as set out in the chart below:

Operational Level	Output	Methodology / Resources / Input
Business Level	**Business Risk Profile** • Noted in ARM Knowledge Base • Safety & Environmental Risks • Business/Division based risks	**Telecommunications Safety Essentials (TSE)** • Critical high risks
Project Level	**Project Risk Register** • Project based risk assessment • Noted in ARM • Developed from Business Risk Profile • Safety & Environmental Risks • Ongoing review to ensure risks applicable to works and controls effective	**Project Risk Workshop** • Consult with stakeholders • Focussed on TSEs and critical risk controls
Activity Level	**SHE Work Method Statements (SHEWMS)** • Activity based risk assessment • All activities involving high risk/ Telco Safety Essential require SHEWMS • Linked to project Risk Register	**Safe Work Procedures** • Focussed on critical risk management and used to develop SHEWMS and training modules • Safe Work Instructions / Environmental instructions also used in SHEWMS development
Task Level	**Take 5 (or equivalent)** • Task based risk assessment • Daily completion • Pocket sized and individual completion / assigned	**Safe Work Instructions / Environmental Instructions** • Risk controls • Referenced in Take 5 or equivalent

5.2.4   Legal and Other Requirements

The Company's operations are subject to environmental regulations at Federal, State and occasionally, at local levels. In particular the Company, when acting on behalf of a Carrier, is subject to the requirements of the Telecommunications Act 1997 and the Telecommunications Code of Practice 1997, as well as the range of State and local laws.

Briefly, the Telecommunications Act and associated regulations, exempts carriers – and their subcontractors - from the requirements of State, Territory and Local Government planning law for certain activities.

These activities are:

- Low Impact Facilities – as specified in the Determination;
- Inspection of Land
- Maintenance;
- Subscriber connections;

- Temporary defence facilities; and

- Facility installation permits

In exercising these powers and immunities under the Act, certain conditions must be complied with including;

- Doing as little damage as practicable

- Acting in accordance with good engineering practice;

- Complying with recognised industry standards;

- Complying with the Code;

- Complying with the prescribed notification process;

- Restoring the land;

- Minimising interference with public utilities;

- Paying reasonable compensation for damage; and

- Complying with international agreements

The responsibilities and procedure to identify the environmental legislation, standards and codes of practice that are relevant to the operations of the Company are documented in:

Referred Documents	Document Number
Awareness of Legal Obligations	VS-HS-PRC-001
SHE Related Legislation	VS-HS-REG-001

Company procedures and work instructions reflect the requirements of the legislation, standards and codes of practices and are periodically reviewed to ensure that relevant changes are included.

The Company subscribes to Safety Law and Environmental Law, which enables the Company to monitor changes legislation and code of practice, and review and revise its policies and procedures as the changes occur.

Documents amended as a result of changes to legislation are posted on the intranet, and all employees are advised by email. In addition, Environmental Alerts advising employees and contractors of important developments are placed on the intranet, and copies handed out at Tool Box Meetings.

The Company monitors its SEQ performance through multi-level reporting on a variety of SEQ objectives and targets, with an aim of achieving continuous improvement. Reporting on SEQ data is provided to the following levels:
- Leighton Contractors (LCPL) Executive Management Team
- The Company's Senior Management Team
- National and Regional SEQ Committees

5.3   Implementation and Operation

5.3.1   Structure and Responsibility

All employees of the Company have responsibility for the environment under their general duty of care.

However, the Company has identified and allocated financial and physical resources to enable the effective implementation of this Environmental Plan. These resources are provided for in the National Management Systems group budget.

At a Line of Business/Project level, budgetary allocations are made for environmental programs; as appropriate for the scope and the scale of the project. These include:

- Site surveys
- Environmental impact studies
- Training
- Emergency Kits (e.g. spill kits, sharps kits)
- Personal Protective Equipment

The Company also has an Access Management Group reporting to the Counsel who manages the following activities:

- Telecommunications Regulatory
- Land Access procedure and implementation
- Environmental Planning and Development
- Stakeholder consultation and logistics management
- Preparation of site-specific Environmental Management Plans where necessary
- Regulatory Approvals

The Access Management Group at the Company includes staff resources experienced in the management of Indigenous Cultural Heritage and Native Title issues including:

- Stakeholder consultation and liaison experts, to supplement the in-house resources
- Archaeological consultant's and
- Field review specialists, to supplement the in-house resources

Specific environmental responsibilities of all levels in the Company are defined and documented in:

Referred Documents	Document Number
National Management Systems Manual	VS-QM-PCY-001
OHS&E Responsibilities & Accountabilities	VS-HS-PRC-003

5.3.2 Training, Awareness and Competence

The Company's procedure for providing training and ensuring the competency of its employees and contractors is defined in:

Referred Documents	Document Number
Education and Training Procedure	VS-HR-PRC-003

A key process identified in the Training Procedure is the conduct of a Training Needs Analysis in all line of business, projects and in National Office to determine the training and competencies each employee requires, to safely perform their work.

The TNA Matrix was developed in consultation with Project representatives and it is a requirement that the Training Matrix and Annual Training Plan be discussed with the SEQ Committee to ensure that employee consultation is achieved.

The TNA is reviewed annually to ensure relevance and to incorporate any changes necessitated by changes to work practices, legislation etc.

5.3.2.1 Environmental Awareness Training

The following environment-related training must be completed by the indicated staff:

- Field SHE Induction – all field-based employees and contractors

- Office Induction – all office based employees and contractors (including agency staff)

- Environmental Awareness– All employees and contractors

- SHE Risk Management – All employees and contractors

- Client-required or Site-specific induction – as required (see Project TNA)

5.3.2.2 Technical Training

Skills training employees need to effectively carry out their work activities.

The output of the Training Needs Analysis matrix is the Training schedule. The training schedule details the program of training to be conducted to fulfil the training needs.

Project-specific training is provided to all employees and contractors at the commencement of new projects if required. This training is conducted by an appropriately experienced employee of the Company.

An appropriately qualified and experienced internal / external provider normally conducts technical training for employees. The following procedure, however, ensures that employees of contractors are assessed as competent prior to commencing working on the Company's behalf.

Referred Documents	Document Number
Subcontractor Selection & Surveillance Procedure	VS-SC-PRC-001

Contractor areas of accountability and responsibility are specified in the terms and conditions of their individual contracts.

5.3.3   Communication

The Company Environmental Policy and all other relevant environmental information is communicated to employees through the following media:

- The policy is posted on the intranet and is displayed in the foyers of Company offices

- A copy of the policy is provided and project-specific aspects and impacts are discussed with all employees and contractors at induction

- Environmental issues are communicated to employees and contractors via toolbox talks and daily prestart meetings

- Environmental Alerts are posted on the intranet and copies provided to employees and contractors at tool box talks.

- Environment is a standing agenda item at Safety, Environmental and Quality Committee Meetings conducted at National and Regional offices. Minutes of SEQ meetings are posted on the intranet, and hard copies are posted on noticeboards in Company offices

Referred Documents	Document Number
Health and Safety Management Arrangements	VS-HS-PRC-002

The Company communicates on environmental matters regularly with external bodies including;

- Clients

- Suppliers

- Community groups

- Landowners and occupiers

- Authorities and Utilities

- Regulators

The project manager and key project staff determine the extent and type of communication necessary at the start of each project, and this is documented in the Project Management Plan.

Key strategies relating to external communications include;

- The establishment and maintenance of regular contact with key stakeholders and those directly affected by project activities

- Provision of effective and prompt resolution of complaints and concerns.

- Minimisation of the potential for issues and concerns to escalate to areas such as the media or political arena

Referred Documents	Document Number
Customer Satisfaction	VS-QM-PRC-006
Media Policy	VS-QMM-010

5.3.4 EMS Documentation

The core elements of the management system and their interaction are described in the following document:

Referred Documents	Document Number
Leighton Telecommunication Group Management System Manual	VS-QM-PCY-001

Direction to the management system and related documentation is provided through the Company Intranet.

5.3.5 Document Control

The Company's Environmental Policy plans and procedures are documented using standard templates and document control processes. The templates and the completed documents are maintained on the Company Intranet. Employees are notified of changes to documents via email. Any hard copies of documents are considered to be uncontrolled. Contractors are advised of changes to Company documents that impact on them via mail or through Toolbox meetings. Appropriate records are maintained. The procedures covering Document and Data Control are:

Referred Documents	Document Number
Document Control Procedure	VS-QM-PRC-001

5.3.6 Operational Controls

Operational controls to manage the environmental impacts of Company activities are implemented at a Project Level. The controls to be implemented to minimise environmental impacts of these activities are described in a series of Environmental Work Instructions.

Referred Documents	Document Number
Watercourse Management	VS-EN-PIN-001
Fire Management	VS-EN-PIN-002
Noise and Air Pollution	VS-EN-PIN-003
Contaminated Land	VS-EN-PIN-004
Waste Disposal and Management	VS-EN-PIN-005

Erosion and Sediment Control	VS-EN-PIN-006
Flora and Fauna	VS-EN-PIN-007
Spill Management	VS-EN-PIN-008
Vegetation Clearance and Reinstatement	VS-EN-PIN-009
Environmental Management Codes	VS-EN-PIN-010
Dewatering	VS-EN-PIN-011
Managing Cultural Heritage	VS-EN-PIN-012
Stakeholder and Community Relations	VS-EN-PIN-013
Weed and Pest Species Management	VS-EN-PIN-014
Acid Sulphate Soils	VS-EN-PIN-015
Land Access	VS-EN-PIN-016

At the commencement of every new project, a risk assessment is undertaken which lists the activities to occur on the project. Each activity is then examined and evaluated to ensure that the existing operational controls are adequate. Should there be any gaps in the existing operational controls for the new activity, a new environmental work instruction or a project-specific work instruction will be developed and placed on the intranet.

5.3.7 Emergency Preparedness & Response

Potential emergency situations have been identified and emergency procedures are in place to ensure there is an appropriate response to incidents affecting the environment. All office staff receive a briefing on office based emergency procedures during their induction training. Project staff receive a briefing on project incident and emergency procedures during the project induction training.

The documents relating to Emergency Preparedness are:

Referred Documents	Document Number
Critical Situation Management	VS-HS-PRC-005
Emergency Preparedness & Response	VS-HS-PRC-006
Incident Notification, Management & Investigation	VS-HS-PRC-004

Emergency response procedures and details of personnel with emergency response responsibilities are posted on the intranet and on notice-boards throughout Company offices. This information is also provided to employees and contractors at induction.

5.4 Checking and Corrective Action

5.4.1 Monitoring and Measurement

There is a documented Safety, Environment & Quality Workplace Inspection Procedure that defines intervals for inspections based on risk, incorporates a reporting and corrective action process; and uses a Visionstream specific checklist. The procedure and forms are:

Referred Documents	Document Number
Safety, Environment & Quality Workplace Inspection	VS-HS-PRC-007
Environment Site Inspection Report	VS-EN-FRM-001

Project-specific environmental performance indicators have been established which detail objectives and targets to be achieved. These performance indicators are

determined through the Risk Management process and are documented in the Project Management Plans.

Referred Documents	Document Number
Risk Management	VS-RM-PRC-001
Project Management Plan Template	VS(XXX)-PM-PLN-001

Equipment for monitoring and measurement related to health, safety and environmental risks is identified, calibrated, maintained and stored as per the manufacturer's instructions, and this requirement is documented in the following procedure:

Referred Documents	Document Number
Inspection, Measuring and Test Equipment	VS-MT-PRC-001

Compliance with relevant environmental legislation and regulatory requirements are reported on a project basis each month. Company procedures and work instructions reflect the requirements of the legislation, standards and codes of practices and are periodically reviewed to ensure that relevant changes are included.

Projects may create a project specific Environmental Management Plan using the following template;

Referred Documents	Document Number
Project Environment Management Plan Template	VS(XXX)-PM-PLN-003

5.4.2   Corrective & Preventive Action

The process of evaluating the effectiveness of the Environmental Management System occurs through the internal audit and inspection process. There is a separate indicator on the Corrective Action Advice which enables non-conformances raised for environmental issues to be reported, analysed and corrective/preventative action implemented. This procedure is documented in:

Referred Documents	Document Number
Corrective & Preventive Action Procedure	VS-QM-PRC-003

Projects are required to report on Notices raised and closed on environmental issues on a monthly basis in the following document:

Referred Documents	Document Number
Project SEQ Report	Cintellate

An analysis of Notices is undertaken as part of the Management Review process and follow-up action is taken to ensure that there is a systematic approach taken to closing out non-conformances.

Referred Documents	Document Number
SHE Performance Report	NA
Management Review Procedure	VS-QM-PRC-005

5.4.3   Change Management

Major changes in the organisation that could impact on environment are systematically managed through the SHE Change Management and Management Review processes.

Referred Documents	Document Number
SHE Change Management	VS-HS-PRC-011
Management Review Procedure	VS-QM-PRC-005

5.4.4   Records

There is a procedure for managing all Company records, including environmental records:

Referred Documents	Document Number
Control of Records	VS-QM-PRC-004
Master Records List	VS-QM-FRM-006

5.4.5   Environmental Management System Audit

The Company produces an annual Internal Audit Schedule to review the National Management System.   All scheduled system audits include an environmental component.

The Company conducts an annual audit of the Environmental Management System to ensure that the system confirms to the requirements of the standard and continues to meet the environmental plan. The internal audit process is defined in:

Referred Documents	Document Number
Internal Audit Process	VS-QM-PRC-002
Internal Audit Schedule	NA

In addition, The Company is externally audited on a periodic basis by Lloyds to maintain ISO 14001 certification. Surveillance audits are conducted every nine months and re-certification audits every three years.

5.5   Management Review

Senior Management oversees a comprehensive review of the Company's National Management System including the Environmental Management System on a system on a periodic basis.   The purpose of this review is to ensure that the Management System continues to be a suitable and effective means of satisfying the Company's stated environmental objectives.   The description of this review and the minutes from the meetings can be found in the following documents:

Referred Documents	Document Number
Management Review Procedure	VS-QM-PRC-005
Management Review – Minutes of Meeting	Minutes of Management Review