COSYSEAL (DOUBLE GLAZING) LIMITED

ENVIRONMENTAL MANUAL & POLICY

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1st February 2020

Managing Director

Environmental Manager

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ENVIRONMENTAL MANUAL

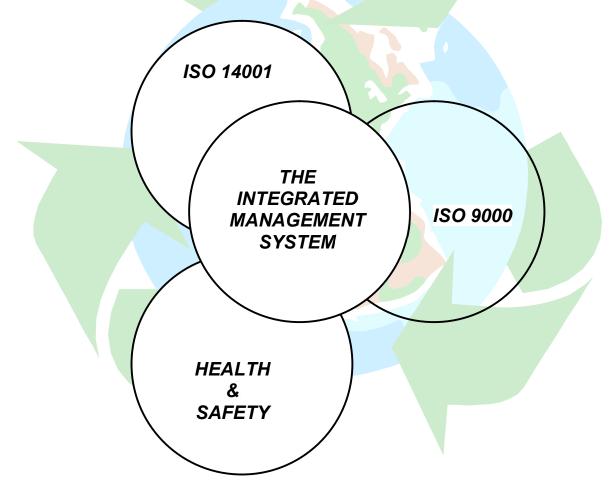
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4.1 GENERAL REQUIREMENTS

PROCEDURE

SOURCE

- 4.1.1 The Organisation has defined its Environmental Management Managing Director System, which is incorporated within this Manual.
- 4.1.2 The Organisation has ensured that there is considerable Managing Director interrelation between its Quality Management, Health and Safety and Environmental Management System, thereby ensuring a wholly integrated management system as follows:



4.2 ENVIRONMENTAL POLICY

STATEMENT

Cosyseal (Double Glazing) Limited (the 'Organisation') recognises the importance of environmental protection and is committed to operating its business responsibly and in compliance with all environmental regulations, legislation and approved codes of practice relating to the supply and installation of windows, doors and associated products and repair of defective systems. It is the Organisation's objective to operate with, and to maintain good relations with all regulatory bodies.

It is the declared policy of the Organisation to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through implementation of the following:

- 1. Assessment and regular re-assessment of the environmental effects of the Organisation's activities
- 2. Assessment and regular re-assessment of the Organisation's environmental objects and targets
- 3. Training of all employees and management in environmental issues
- 4. Minimisation of the production of waste
- 5. Minimisation of material wastage
- 6. Minimisation of energy wastage
- 7. Promotion of the use of recyclable and renewable materials
- 8. Reduction and/or limitation of the production of pollutants to water, land and air
- 9. Control of noise emissions from operations
- 10. Minimisation of the risk to the general public and employees from operations and activities undertaken by the Organisation.

This policy is communicated to all employees, suppliers and subcontractors and is made available to the public.

SOURCE

Managing Director

4.3.1 ENVIRONMENTAL ASPECTS

PROCEDURE

RESPONSIBILITY

- 4.3.1.1 The Organisation determines the environmental aspects of its Environmental Team activities that may either directly or indirectly have an impact on the environment, by considering the following:
 - 1. Regulation and legislation
 - 2. Unregulated or minimally regulated aspects
 - 3. Water and energy consumption
 - 4. CO² releases
 - 5. Materials and goods purchased
 - 6. Transportation of the product
 - 7. Organisation's vehicles including staff allocated
 - 8. End-of life product disposal
 - 9. Production processes 10. Emergency situations.

COSHH data sheets supplied by manufacturers and suppliers are included in this review process.

- 4.3.1.2 A list of significant aspects is maintained and by a process of Environmental regular review, ranked by the Environmental Team according Manager to the Organisation's ability to reasonably control or influence environmental improvement.
- 4.3.1.3 Each qualifying significant aspect is recorded on an Environmental Environmental Risk Assessment Sheet and a programme Manager developed in accordance with the procedures herein.
- 4.3.1.4 The Environmental Manager assesses the need for similar Environmental controls for any new activity or activity not previously Manager considered applicable, in the course of day to day activities.
- 4.3.1.5 The process is repeated as part of:

Environmental Team

- 1. Management Review as described in Section 4.6 (Management Review)
- 2. The order process detailed in Section 7.5 (Production and service provision) of the Quality Manual

4.3.2 LEGAL AND OTHER REQUIREMENTS

PROCEDURE

RESPONSIBILITY

- 4.3.2.1 The Organisation maintains subscriptions to specialist Environmental publications and up to date copies of relevant legal or Manager regulatory documents in order to identify and keep current its legal and regulatory obligations.
- 4.3.2.2 The Organisation maintains contact with Government Environmental Environmental Agencies to keep informed of changes, both Manager local and global that affect its environmental responsibilities.
- 4.3.2.3 Review of the Organisation's legal and regulatory obligations Environmental Team forms part of the Management Review process described in Section 4.6 (Management Review).

4.3.3 OBJECTIVES AND TARGETS 4.3.4 ENVIRONMENTAL MANAGEMENT PROGRAMME

PROCEDURE

RESPONSIBILITY

4.3.3/ Having identified and documented significant environmental Environmental
4.3.4.1 impacts on Environmental Risk Assessment Sheets, realistic Manager and cost effective objectives and targets are set in order to mitigate the impact on the environment.

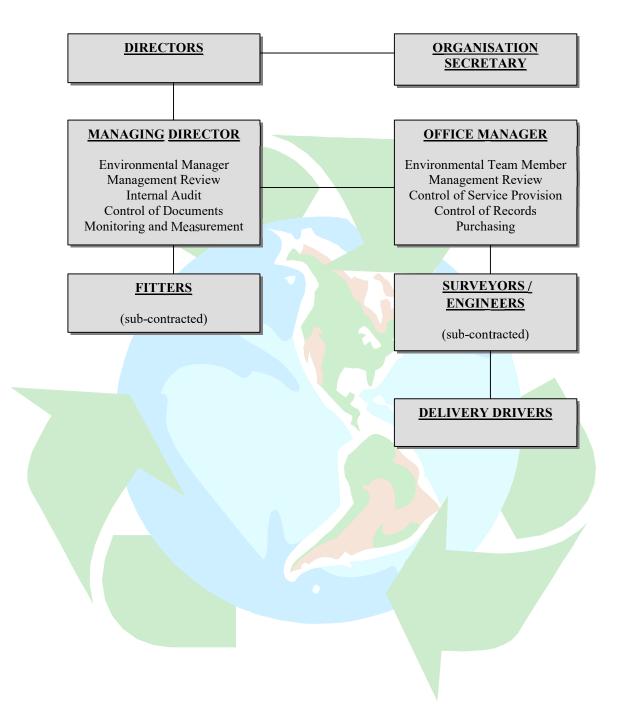
4.3.3/	Targets and objectives determined are recorded on t	he Environmental
4.3.4.2	relevant Environmental Risk Assessment Sheet.	Manager

- 4.3.3/Where appropriate, a programme for the achievement ofEnvironmental4.3.4.3 each target is set and recorded on the relevant Environmental Manager Risk Assessment.
- 4.3.3/ Those participating or otherwise interested in the programme Environmental

- 4.3.4.4 are briefed and trained, where necessary, and responsibilities Manager incorporated, as appropriate, in work instructions, action lists, personal diaries and/or follow up systems.
- 4.3.3/Responsibilities are established and progress monitored by
the Environmental Manager.Environmental
Manager
- 4.3.3/ Environmental Risk Assessments are kept under regular Environmental
 4.3.4.6 review by the Environmental Manager or nominated deputy Manager and revised where existing activities are changed or new activities introduced. All staff affected are informed in accordance with the procedures described in Section 4.4.3 (Communication).

4.4.1 STRUCTURE AND RESPONSIBILITY

This is a management structure relating to environmental matters and not necessarily to other management functions and responsibilities.



Environmental Manager

The Environmental Manager is responsible for the following:

Environmental Manager

- 1. Achieving the Organisation's environmental objectives
- 2. Managing the Environmental Management System
- 3. Convening and chairing the Management Review Meeting
- 4. Reporting on environmental performance to the Quality Team
- 5. Achieving the internal audit programme 6. Maintaining the Environmental Manual
- 7. Environmental training.

Environmental Team

The Environmental Team comprises members of staff Environmental Team representing key areas of the Organisation, nominated by the Environmental Manager (Managing Director).

The Environmental Team meets at least annually to carry out a Management Review, and also at the request of the Environmental Manager to consider new environmental aspects or issues requiring a prompt response.

Further responsibilities are separately identified in this Environmental Team Environmental Manual.

4.4.2 TRAINING, AWARENESS AND COMPETENCE

PROCEDURE

RESPONSIBILITY

the

4.4.2.1 Environmental training needs are identified as the result of following: Manager/

Environmental Team

Environmental

- Management Review process described in Section 4.6 (Management Review)
- 2. Individual pre and post project planning processes
- 3. Day to day management of the Organisation.
- 4.4.2.2 The Environmental Team takes into account the following Environmental Team factors when considering potential training needs:
 - 1. Policy
 - 2. Procedures
 - 3. Impacts
 - 4. Performance
 - 5. Roles
 - 6. Responsibilities
 - 7. Emergencies
 - 8. Unusual situations.
- 4.4.2.3 Environmental training needs are met using the methods and Environmental Team procedures described in Section 6.2 (Human Resources) of the Quality Manual.

4.4.3 COMMUNICATION

<u>PROCEDURE</u>

RESPONSIBILITY

4.4.3.1 Internal communications are facilitated by the use of methods Environmental Team such as:

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ENVIRONMENTAL MANUAL

- 1. Written work instructions
- 2. Environmental Method Statements
- 3. Circulated Environmental Risk Assessments
- 4. Notice Board
- 5. Meetings
- 6. Telephone
- 7. E-mail
- 8. Memoranda
- 9. Training-induction and project specific
- 10. Verbal instruction.
- 4.4.3.2 Communications received from external interested parties are All Staff passed to the Environmental Manager.

Observation:

External interested parties may include the following:

- 1. Suppliers
- 2. Customers
- 3. Regulatory agencies 4. Enforcement agencies
- 5. Local residents.
- 4.4.3.3 Where appropriate, the Environmental Manager liaises with Environmental other members of the management team to investigate and Manager resolves issues raised.
- 4.4.3.4 A record is kept on an environmental correspondence record Environmental of the dates and nature of any communication together with a Manager record of the response given.

4.4.4 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION

PROCEDURE

RESPONSIBILITY

- 4.4.4.1 The following documents together, define the Organisation's Environmental Environmental Management System and ensure the effective Manager planning, operation and control of its processes:
 - 1. The Environmental Policy
 - 2. This Environmental Manual
 - 3. The Health & Safety Policy
 - 4. The Health & Safety Manual
 - 5. The Quality Policy
 - 6. The Quality Manual
 - 7. Legal and regulatory publications.
- 4.4.4.2 Review of the Environmental Management System Environmental Team documentation, in order to ensure that it continues to meet the aims of the Environmental Policy, forms part of the Management Review process described in Section 4.6 (Management Review).

4.4.5 DOCUMENT CONTROL

PROCEDURE

RESPONSIBILITY

- 4.4.5.1 The Environmental Manual is controlled in accordance with Environmental the procedures detailed in Section 4.2 (Documentation Manager/ Requirements) of the Organisation's Quality Manual. Quality Manager
- 4.4.5.2 A Master File of all Environmental Risk Assessment Sheets Environmental is maintained, categorised as follows: Manager
 - 1. SOP (Standard Operating Procedure)
 - 2. Order specific
 - 3. Paints and Cleaning Chemicals Stores •4. Emergency situations.

Each set is updated as required by changes in operational procedures and/or as required by changes in legislative or regulatory requirements.

4.4.5.3 Copies of all order specific Environmental Risk Assessment Environmental Sheets are retained in the appropriate project file. Manager/

Office Manager 4.4.5.4 A controlled copy of each relevant legal and/or regulatory Environmental publication is retained by the Environmental Manager and Manager updated or replaced as necessary.

4.4.6 OPERATIONAL CONTROL

PROCEDURE

RESPONSIBILITY

- 4.4.6.1 Internally, environmental operational control is achieved by: Environmental Team
 - 1. Circulating Environmental Risk Assessments
 - 2. Environmental training
 - 3. Issuing Method Statements and/or work instructions (verbal and written) 4. Process monitoring.
- 4.4.6.2 The Organisation keeps under review the need for environmental operating controls which may following:
 - 1. Maintaining and recording limits in its production process
 - 2. Standards or timings which may include sampling or analysis
 - 3. Reporting to regulating bodies.
- 4.4.6.3 One of the criteria used in the process to select suppliers and Environmental subcontractors, detailed in Section 7.4 (Purchasing) of the Manager/ Quality Manual, is evaluation of their environmental Purchasing Manager performance.
- 4.4.6.4 The Organisation conducts appropriate research into Purchasing Manager suppliers' environmental practices and may require the completion of an Environmental Supplier Questionnaire, where the goods or services provided have a significant effect on the Organisation's own environmental objectives.

- 4.4.6.5 Purchase Orders are placed in accordance with the procedures Purchasing Manager in Section 7.4 (Purchasing) of the Quality Manual, any environmental requirements or preferences being specified accordingly.
- 4.4.6.6 Suppliers attending the Organisation's premises are suitably Environmental inducted in the Organisation's Environmental Policy and best Manager working practices.

4.4.7 EMERGENCY PREPAREDNESS AND RESPONSE

PROCEDURE

RESPONSIBILITY

4.4.7.1 Abnormal operating conditions and potential emergency Environmental Team situations are treated as significant environmental aspects and administered in accordance with the procedures detailed in Section 4.3.1 (Environmental Aspects) and other relevant procedures herein.

4.5.1 MONITORING AND MEASUREMENT

PROCEDURE

RESPONSIBILITY

- 4.5.1.1 Where necessary, a method for monitoring and measuring the Environmental Organisation's achievement of each of its environmental Manager objectives and targets is determined and recorded on the appropriate Environmental Risk Assessment Sheet.
- 4.5.1.2 The Organisation does not currently have any requirements to Environmental employ environmental measuring or monitoring devices or Manager equipment. Should this situation change, by customer demand or any other reason, appropriate procedures will be included in the Quality Manual. The Management Review process monitors this situation.
- 4.5.1.3 Environmental legislation and regulation that may affect the Environmental Team Organisation is monitored by the following means:
 - 1. Management Review
 - 2. Day to day Review and Planning Meetings 3. Research of requirements for new processes.

4.5.2 NON-CONFORMANCE AND CORRECTIVE AND PREVENTIVE ACTION

PROCEDURE

RESPONSIBILITY

- 4.5.2.1 Significant non-conformances in the operation of the All Staff Environmental Management System are reported to the Environmental Manager.
- 4.5.2.2 Significant non-conformances are investigated to establish Environmental their validity and cause and a record of the investigation kept Manager

on an Environmental Non-conformance Report clearly marked as having environmental considerations.

- 4.5.2.3 A record is kept on the Environmental Non-conformance Environmental Report of any action taken to correct and/or prevent Manager recurrence of the non-conformance.
- 4.5.2.4 Review of the non-conformance records forms part of the Environmental Team Management Review detailed in the procedures set out in Section 4.6 (Management Review).

4.5.3 RECORDS

PROCEDURE

RESPONSIBILITY

- 4.5.3.1 The following records are kept for a minimum period of three Environmental years, in order to demonstrate effective implementation of the Manager Environmental Management System:
 - 1. Environmental Risk Assessments
 - 2. Staff training records
 - 3. Environmental Correspondence Schedule
 - 4. Approved Supplier records
 - 5. Non-conformance records
 - 6. Internal and external audit records 7. Monitoring and measurement records
 - 8. Management Review records.

4.5.4 ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT

PROCEDURE

RESPONSIBILITY

4.5.4.1 An audit programme is maintained by the Environmental Environmental Manager ensuring that each Section of the Environmental Manager Management System is verified at least annually.

- 4.5.4.2 More frequent audits may be organised depending on the Environmental importance of the activities being audited. Manager
- 4.5.4.3 At the beginning of each month, consult the audit and establish which, if any, procedures are to be coming month.
- 4.5.4.4 Refer to the Environmental Register and determine the Environmental Sections and procedures to be audited. Environmental Manager
- 4.5.4.5 Determine a representative number of records and select, on Environmental a random basis, the actual records to be audited. Manager
- 4.5.4.6 Advise the staff concerned that an environmental audit is Environmental being undertaken and answer any questions they may have Manager regarding the audit.
- 4.5.4.7 Examine the records selected to determine whether the Environmental procedures identified in Section 4.5.4.4 above were carried Manager out correctly.
- 4.5.4.8 If procedures were not undertaken correctly, discuss with the Environmental appropriate member of Staff responsible for carrying out the Manager procedure to determine the reasons for deviation from the procedures.
- 4.5.4.9 Complete the Audit Report Form (QS 002) detailing the Environmental audit results and retain these for inspection by QMS Quality Manager Management Systems, at the year end audit.
- 4.5.4.10 Arrange for the environmental audit results to be discussed at Environmental the next management review meeting. Manager

4.6 MANAGEMENT REVIEW

PROCEDURE

RESPONSIBILITY

4.6.1At intervals of no more than twelve months, a ManagementEnvironmentalReview is carried out by members of the EnvironmentalManager

Team together with other members of staff if appropriate.

4.6.2 The agenda for the Management Review Meeting includes Environmental the following: Manager/

Environmental Team

- 1. Review of actions from the last Management Review
- 2. Continuing suitability of the documents listed in Section 4.4.4 (Documentation) including the Environmental Policy
- 3. Changes in legal and regulatory obligations
- 4. Changes in operating systems, production methods or policies that may have environmental implications
- 5. Results of compliance audits (internal and external) 6. Environmental aspects
 - Review current performance (objectives and targets)
 - Consider new aspects (existing activities and preventive measures)
 - Agree Priority List of Environmental Aspects for the next year
- 7. Proposed changes to the Environmental Team
- 8. Environmental training needs
- 9. Review Non-conformance and Corrective Action Reports
- 10. Review Environmental Correspondence Schedules.

4.6 MANAGEMENT REVIEW, (Continued:)

PROCEDURE

RESPONSIBILITY

4.6.3 A record is kept of the findings of the management review.

Environmental Manager

- 4.6.4 The Environmental Manager monitors the agreed action Environmental points and records their effectiveness for discussion at the Manager next Management Review Meeting.
- 4.6.5 The findings of management reviews are reported to the Environmental Quality Team in accordance with the procedures detailed in Manager Section 5.6 (Management Review) of the Quality Manual and kept in accordance with other Management System records as set out in Section 4.5.3 (Records).

