

# Procedure for Identifying Environmental Aspects & Impacts

PHX077

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# Scope

This procedure contains the following sections:

1. Identification of potential emergency situations and accidents
2. Response to emergencies and mitigation of adverse environmental impacts
3. Tests and review of emergency preparedness and response procedures

# Responsibility

The Managing Director and Environmental Management Committee (EMC) are responsible for the implementation of this procedure.

The Operations Director and EMC are responsible for identifying potential emergency situations and potential accidents and determining those potential events that may have a significant environmental impact. They are also responsible for the review and periodic testing of elements of the emergency preparedness and response procedures.

The Managing Director, Operations Director and EMC are responsible for the implementation of corrective and preventative action resulting from an emergency situation or accident.

# Procedure

## Identification of potential emergency situations and accidents

Identification of potential emergency situations and accidents will be carried out through the Risk Assessment process for all new contracts/introduction of new service offerings through the Change Management process. An Environmental Risk Assessment policy is also documented in the Policy Library.

Identification of methods, risks, hazards, and controls based on site specific risk assessments may also be documented in new contract proposals as requested by the customer and at the discretion of Phoenix. These may include method statement, legislation and PPE required. Proposal documents will also include identification of environmental issues covering potential noise, land, water, light, and air pollution.

New Aspects are identified through change management procedures and Environmental Impact assessment and consideration with appropriate mitigation being a requirement prior to change approval.

The purpose of risk assessment is to identify the significant risks in the workplace and then

control those risks at an acceptable level to comply with the Management of ISO 14001 and H&S guidelines. All risk assessments are reviewed annually.

### Response to emergencies and mitigation of adverse environmental aspects

Phoenix higher risk activities may result in or be subject to:

- Fire/explosion
- Oil/fuel spillages
- Adverse weather conditions

In the unlikely event of an emergency situation arising that has an adverse environmental impact, the Business Continuity Plan will be implemented. Upon satisfactory completion of the business continuity plan, post-accident evaluation will be carried out and appropriate corrective and preventive action implemented. Third parties will be communicated with as per the Environmental Communication Policy.

Corrective and preventive action must be documented within the ISO Measurement Log and should include details of the emergency, root cause, impact, corrective and preventive actions, responsibilities, and timescales. A review of the effectiveness of action should also be documented through the Management Review.

### Test and review of emergency preparedness and response procedures

The test and review of the Emergency Preparedness and Response process is carried out in accordance with Phoenix Business Continuity procedures. This may include the test/review of elements of disaster recovery, training/performance of business continuity personnel, building evacuation, internal and external communication, availability of risk/hazard information and effectiveness of (planned) mitigation and response actions. The majority of these processes are tested and verified each time an emergency situation arises.

In addition to the above, response to simulated emergency situations is also tested through periodic table-top exercises with the EMC. Results of these exercises are recorded and any improvement opportunities identified.

The evacuation of the office facility is also tested twice annually.

## Enforcement

Phoenix employees found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. A violation of this policy by a contracted third party, partner/contractor or vendor may result in the termination of their contract or assignment with Phoenix.

## Version Control

<u>Author</u>	<u>Version</u>	<u>Date</u>	<u>Description</u>
EMC	0.1	30/12/2019	Draft
EMC	1.0	10/01/2020	Original Document
EMC	1.0	05/01/2021	Annual review – no changes
EMC	1.0	07/01/2022	Annual review – no changes
EMC	2.0	23/01/2023	Changes following annual review

## Document Approval

<u>Name</u>	<u>Version</u>	<u>Date</u>	<u>Position</u>
Sam Mudd	1.0	10/01/2020	Managing Director
Sam Mudd	1.0	05/01/2021	Managing Director
Sam Mudd	1.0	07/01/2022	Managing Director
Clare Metcalfe	2.0	31/01/2023	Operations Director

Signed: *Clare Metcalfe* Clare Metcalfe, Operations Director

Dated: 31/01/2023