



ENVIRONMENTAL PROCEDURE

COMPLIANCE OBLIGATIONS

EP 02

APPROVALS

[Redacted Signature]

Date: _____

Quality & Environmental Manager, Management Representative

Rev	Revision Date	Description of Change	Originator
2	11/01/17	Significantly updated to include new ISO 14001:2015 standard requirements	[Redacted]
3			
4			

The purpose of this procedure is to ensure that the Pal identifies, has access to, and understands all compliance obligations relevant to this site. Pal must evaluate, on a regular basis, its compliance to legal and regulatory requirements, and to any other standards or requirements by interested parties to which it subscribes.

1 Documentation

EP02/01 Compliance Obligations Register

EP08/01 Green Forms - Environmental incident records including near-miss incidents

Examples

Process authorisation / installation permits / consents

Waste consignment notes

Monitoring data records (water, waste, energy, suppliers' environmental credentials)

Site drainage plans

Abatement plant and monitoring equipment specifications

Drawings/plan of storage facilities, pipe work systems

Facilities maintenance records

Correspondence with the local authority, EA, sewerage undertakers and interested parties

2. Procedure

2.1 Monitoring of Legal and Other Requirements

Continuously monitor developments in the legal framework in which the site operates through the environmental management consultant. Examples of useful sources of legislative and general environmental information are:

www.iema.net - INSTITUTE OF ENVIRONMENTAL MANAGEMENT & ASSESSMENT: Best practice journals and environmental law bulletins

www.environmentalisonline.com/type/new-regulations - Subscription through IEMA providing new environmental regulations

www.legislation.gov.uk - Government Statutory Instrument Legislations

<https://www.gov.uk/topic/environmental-management> - Government environmental information

The Environmentalist Magazine - Monthly subscription magazine from IEMA

2.2 Recording of Compliance Obligations

Record all compliance obligations relevant to the site's environmental aspects on EP02/01 Compliance Obligations Register, including the following information:

- Title of compliance obligation
- Summary of duty imposed
- The relevance to the process, activities product or service
- Regulatory body / interested party
- Records / documents reference location
- Compliance obligation review date
- Responsibility

Compliance obligations are categorised as follows:

- Air
- Land
- Energy
- Water
- Waste
- Noise / Nuisance / Visual
- Natural Habitat
- Other

2.3 Updating the Compliance Obligation Register

Continuously update EP02/01 Compliance Obligation Register to reflect new and amended requirements. Formally review the register within the MRM meetings and document the results of the review within the minutes of the meetings.

2.4 Evaluation of Compliance / Compliance Audit

1. Review applicable current and forthcoming regulatory and interested parties' requirements on EP02/01 Compliance Obligations Register
2. Identify significant environmental aspects that are governed by legislative, regulatory or interested parties' requirements
3. Highlight new or amended requirements to allow easy comparison with previous compliance audit on EP02/01 Compliance Obligations Register
4. Examine existing environmental practices and procedures and documentary evidence, identifying the level of compliance with each legal, regulatory or interested parties' requirement
5. Evaluate feedback from environmental incident investigations using EP08/01 Green Form
6. Key tasks to complete during an environmental compliance audit are:
 - Checking of the environmental policy, compliance obligations register, supplementary compliance obligations requirements documentation, environmental aspects and impacts register and other EMS documentation;
 - Assessing the adequacy of current arrangements in dealing with significant aspects and identifying where gaps exist; and
 - Developing and implementing an action plan with the issues arising and establish an agenda for regulatory compliance and continual improvement.
7. Record outcomes of audit in the compliance column of EP02/01 Compliance Obligations Register
8. A compliance obligation audit can be conducted independently of the regulatory and interested parties' audit.
9. Refer to professional legal sources of information as a basis for a compliance review (see section 2.1)