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<b>ENVIRONMENTAL ASPECTS REGISTER-App 2</b>				
<u>WRITTEN BY:</u> Fred Wilson, HS&E Competent Person	<u>APPROVED BY:</u> Howard Moher Operations Director	<u>EFFECTIVE DATE</u>  Aug 2011	<u>REVISION NUMBER</u> 4	<u>DATE OF PREVIOUS REV.</u> July 2010

## Criteria for evaluation of an Environmental Aspect

### “Risk Assessment” Analysis

1. Identify an activity, product, resource, waste or service etc., for assessment.
2. Document the assessment of the selected item in the Aspects Register. Enter the details onto the fields marked “Section of the Company”, e.g., Offices, Warehouse, Production etc and “Activity” e.g. Printing, Storage of Oil, Guillotine
3. The field “ Aspects” should be completed by documenting any adverse or beneficial impacts on the environment. The field “Impacts” should be completed by documenting the change, which takes place in the environment as a result of the aspect, whether positive or negative , whether wholly or partly due to Easibind’s activities. Include in the column “Condition” if the Aspect is as result of Normal , Abnormal or emergency situation.
4. Establish how much Control the company has over the Aspects and Impacts, e.g., “ No control” , “ a Little” , “Some” or “ Much”,
5. Make an assessment on the significance of the Aspects according to the criteria below. The Aspect is Significant if :
  - It could require the use of a local emergency service
  - It would result in breach of law or permit
  - There would be an obligation to inform a regulator or other statutory body
  - It may be of interest to the local media
  - The use of the material, product, process or building is locally intrusive.

Otherwise the Aspect is insignificant.

NB: To decide if something is **locally intrusive** is best seen as a matter of personal judgement. The following table contains guidance to help consider intrusiveness.

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Considering	Possible reason ...	Possible intrusion ...
Material	Odour	<ul style="list-style-type: none"> <li>▪ nuisance</li> </ul>
	Toxic effects reported publicly	<ul style="list-style-type: none"> <li>▪ heightened concern/worry</li> <li>▪ perceived ill-health</li> <li>▪ (exacerbated by local environmental pressure groups or media)</li> </ul>
	Environmental or Safety issues reported publicly	<ul style="list-style-type: none"> <li>▪ heightened concern/worry</li> </ul>
Product	as above (it should be remembered that a lot of our products are someone else's raw materials, so the intrusion may not be local to our site, but local to our customers)	
Process	Transport	<ul style="list-style-type: none"> <li>▪ Nuisance</li> <li>▪ safety fears</li> </ul>
	Visible emissions (e.g. steam plumes)	<ul style="list-style-type: none"> <li>▪ visual intrusion</li> </ul>
	Light	<ul style="list-style-type: none"> <li>▪ Visual intrusion</li> </ul>
Building	Height	<ul style="list-style-type: none"> <li>▪ Visual intrusion</li> </ul>
	Appearance/state of repair	
	Security fencing/guards/gates	

6. Carry out an Analysis of the environmental Impacts of the significant Aspects using the "Hazard Analysis" sheet in similar manner to carrying out an Occupational H&S Risk Assessment
7. Fill in the "Description of the Aspect" field , complete the "Current Control Measures" field by a subjective assessment of possible / existing controls or practices that could be employed and identify those that are already in existence (these are used to establish both the likelihood and the consequences).
8. The next step is to assess the risk of an environmental impact by determining the likelihood and possible consequences of an incident.
  - (a) First determine the likelihood (L) of the impact by the following criteria:

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Likelihood	Planned Event	Unplanned Event
Not likely	Not done	Many failures need to occur before incident occurs
Possible	<1 in 10 years	A number of failures are needed
Quite possible	<1 per year	A single failure will cause the incident
Likely	Intermittent  >1 per year	Difficult to avoid
Very likely	Frequent or continuous	Expected to happen

(b) Determine the Consequence of the impact on the environment based on the following criteria:

Consequence	Examples
Very low	<u>Planned releases</u> - low impact - no regulation <u>Internal complaint</u> - employee within business - other on-site business <u>Spill/release</u> - no loss to sewer - no loss to water - no significant ground or groundwater contamination - no off-site odour <u>Other abnormal</u> - internal to site releases
Low	<u>Planned releases</u> - some impact - local regulation - breach of Code of Practice or business guidance  <u>External complaint</u> - one only <u>Spill/release</u> - slight off-site odour/effects, local or near boundary only - loss to sewer but without harm to the treatment plant - particulates etc released off-site without causing damage - loss to water - ground or groundwater contamination but limited impact to on-site only  <u>Other abnormal</u> - some off-site impact releases - no regulatory action

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Consequence	Examples
Medium	<p><u>Planned releases</u> - impact requires assessment</p> <ul style="list-style-type: none"> <li>- national regulation</li> <li>- breach of permit/licence conditions</li> </ul> <p><u>External complaints</u> - several from an individual from several people</p> <ul style="list-style-type: none"> <li>- local media interest</li> </ul> <p><u>Spill/release</u> - off-site odour/effects</p> <ul style="list-style-type: none"> <li>- particulates etc cause damage to property</li> <li>- loss to sewer, required notification to treatment plant operator</li> <li>- loss to water in breach of discharge permit/licence but without harm</li> <li>- ground or groundwater contamination limit impact on-site but requires clean-up</li> </ul> <p><u>Other abnormal</u> - off-site impacts releases - regulatory action</p> <ul style="list-style-type: none"> <li>- improvement notice served or threatened</li> </ul>
High	<p><u>Planned releases</u> - extensive national and/or international regulatory controls</p> <p><u>External complaints</u> - severe</p> <ul style="list-style-type: none"> <li>- national media interest</li> </ul> <p><u>Spill/release</u> - widespread and/or prolonged effect off-site odour/effects</p> <ul style="list-style-type: none"> <li>-loss to sewer, treatment works takes action (e.g. diverts flow to emergency tank) or treatment works affected</li> <li>- loss to water, small fish kill or similar damage</li> <li>- downstream water consumers complain about tainted water. Small number have ill-health</li> <li>- ground or groundwater contamination. Off-site impacts require clean-up</li> </ul> <p><u>Other abnormal</u> - regulatory investigation</p> <ul style="list-style-type: none"> <li>- prohibition notice served</li> <li>- local evacuation, no damage</li> <li>- limited damage to local crops, livestock, wildlife</li> </ul>

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c. Complete the “Risk Rating” (R) field using the risk matrix below.

**Risk Matrix**

Likelihood Severity	Not Likely	Possible	Quite Possible	Likely	Very Likely
Very low	Very low	Very low	Low	Medium	Medium
Low	Very low	Very low	Medium	Medium	High
Medium	Low	Medium	Medium	High	High
High	Medium	Medium	High	Very high	Very high
Very high	Medium	High	High	Very high	Very high

d. In the section “Conclusions” document the significance based on the following criteria:

**ENVIRONMENTAL ASPECTS EVALUATION**

Class	Importance and Action	Criteria (one or the combination of):
High	Immediate Action and/or control are mandatory	<ul style="list-style-type: none"> <li>▪ “Aspect” is currently not controlled under normal operations.</li> <li>▪ Could break legal or policy documents.</li> <li>▪ In breach of legislation</li> <li>▪ Sensitive environment (groundwater proximity, conservation area, residential area)</li> <li>▪ Repeated complaints</li> </ul>
Medium	Action and/or control are required in the near future	<ul style="list-style-type: none"> <li>▪ Exceeding of threshold values in case of operating problems (abnormal conditions) and above average high probability of occurrence and/or low probability of detection.</li> <li>▪ Financial threat</li> <li>▪ Effect likely to increase under planned activities</li> <li>▪ Rising concern of shareholders</li> <li>▪ Emergency situation would cause a large environmental impact</li> <li>▪ Complaint received</li> <li>▪ “Aspect” not fully controlled under normal conditions</li> </ul>

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<b>Class</b>	<b>Importance and Action</b>	<b>Criteria (one or the combination of ):</b>
Low	Little or negligible action and/or control are useful, but not required in the short term, review in the future is useful	<ul style="list-style-type: none"> <li>▪ Exceeding of threshold value in case of operating problems (abnormal conditions) and low effect and low probability of occurrence and/or high probability of detection.</li> <li>▪ Minimal effect</li> <li>▪ Limited probability of occurrence</li> <li>▪ “Aspect” controlled under normal conditions</li> <li>▪ High knowledge of “Aspect”</li> </ul>

One of the criteria's mentioned is sufficient to classify the effect within a specific category, e.g. if there is a breach of legislation or policy, then the impact is automatically classed as “High”.

9. Using the criteria documented in the “Classification” field document the final overall classification as “High”, “Medium” or “Low. Transfer this rating to the “Hazard Identification” sheet.
  10. Include a relevant observation in the “Comment “ field.
  11. Determine what action is required to further reduce the Aspect Rating and include this in the “Action Required” field.
  12. Transfer the Actions required to the Company “Action Tracker” for Senior Management to review.
- N.B. Should the final classification result in the Aspect being considered in the Management Programme the scores in the “Rating” section can be used to allocated priority to the associated “impacts” arising from the risk assessment process.

It is recognised that this method is subjective and some further interpretation may be required.