

MANUAL Health, Safety and Environmental	Reference : Man 1.001 Edition : 2 Date : 09/07/2015 Pages : 29
---	---

**SAFETY, HEALTH AND ENVIRONMENTAL MANAGEMENT SYSTEM
MANUAL**

Distribution:

✓ All employees

Only the electronic version on Quality Workbench is valid

1	Creation of the document	09/07/2015
Amendments (last three)		
Issue n°	Purpose of revision	Date
2	Review following loss of M.Crowe, organogram edited. All sections reviewed	08/01/2016

Document owner: Paul GABBITAS

Written by	Checked by	Approved by
James CRIBBES HSE Manager	Steve CARTER Unit Manager Gary Summers Safety Representative	Paul GABBITAS Plant Manager

Safety Health and Environmental Management Manual

1. Site overview

1.1 Pre-July 2014

Arkema Coatings Resins Ltd UK is a seven-acre site situated on the south bank of the River Humber in North East Lincolnshire near the village of Stallingborough and within 2-3 miles of the small town of Immingham.

Originally established as a joint partnership venture between Laporte Industries and Synres of Holland, the first resins were produced at the Arkema Coatings Resins Ltd site in 1967. In 1970 the Arkema factory was acquired by Coates Brothers who developed the site and produced resin here until 1990 when it was acquired by Cray Valley as part of Total Oils Resin Division.

In July 2011, Total sold the coatings business to Arkema, however the Stallingborough site continues to manufacture structural resins for CCP composites (formerly Cray Valley) using a tolling and business agreement.

The site was a multi product resin plant with a manufacturing capacity of 45,000 tonnes per annum producing alkyd, gelkyds, unithane, industrial resins and unsaturated polyesters and gelcoat resins. Due to the storage and handling of TDI, the site was registered as a lower tier COMAH site.

Arkema Coatings Resins Ltd comprised three main production units, an administrative block, an engineering workshop, a dry goods warehouse and various tank farms for raw material and finished product storage.

In addition, located within the site are the offices and research & development labs of Polynt (CCP) Composites who lease the building from Arkema.

Arkema employed 87 full time employees and operates a four - shift, seven days a week manufacturing operation, working 12 hours in the Reactor and Polyester Mixing Building. The Gelcoat department operates on a five day, two shift system. There are a further 22 people employed by Polynt.

1.2 Post July 2014

Arkema ceased coatings resin production on the Stallingborough site on the 9th July 2014, this resulted in the closure, decommissioning and demolition of the reactor building and all associated storage tanks, buildings etc.

The Gel Coat and PMB processes are continuing, with supply to Polynt Composites on the same site under and operational agreement, expected to be ongoing for the next five years. Arkema are effectively providing manpower and buildings/equipment to produce Polynt's structural resins.

The Reactor building, storage tanks, technical services block, laboratories etc were demolished. There are now no Arkema HR, Sales or Logistics departments on site.

The site no longer uses TDI, hence is no longer a COMAH site, and has since surrendered its COMAH licence. Only low risk cold mixing processes remain on site.

As a result of the closure, the company had undergone a series of redundancies and have resulted in the workforce reducing from 85 to 25.

Safety Health and Environmental Management Manual

2. Introduction to the Management System

The site has established, documented, implemented and maintains HSEQ Management systems certificated to OHSAS 18001 and ISO 9001. Previously the site was accredited to ISO14001, but has cancelled this registration following the major organisational changes. The environmental management systems and procedures remain in place as described in this manual.

These standards enable the organization to control its Health, Safety and Environmental (HSE) risks and continually improve performance HSE performance.

3. Management System Scope

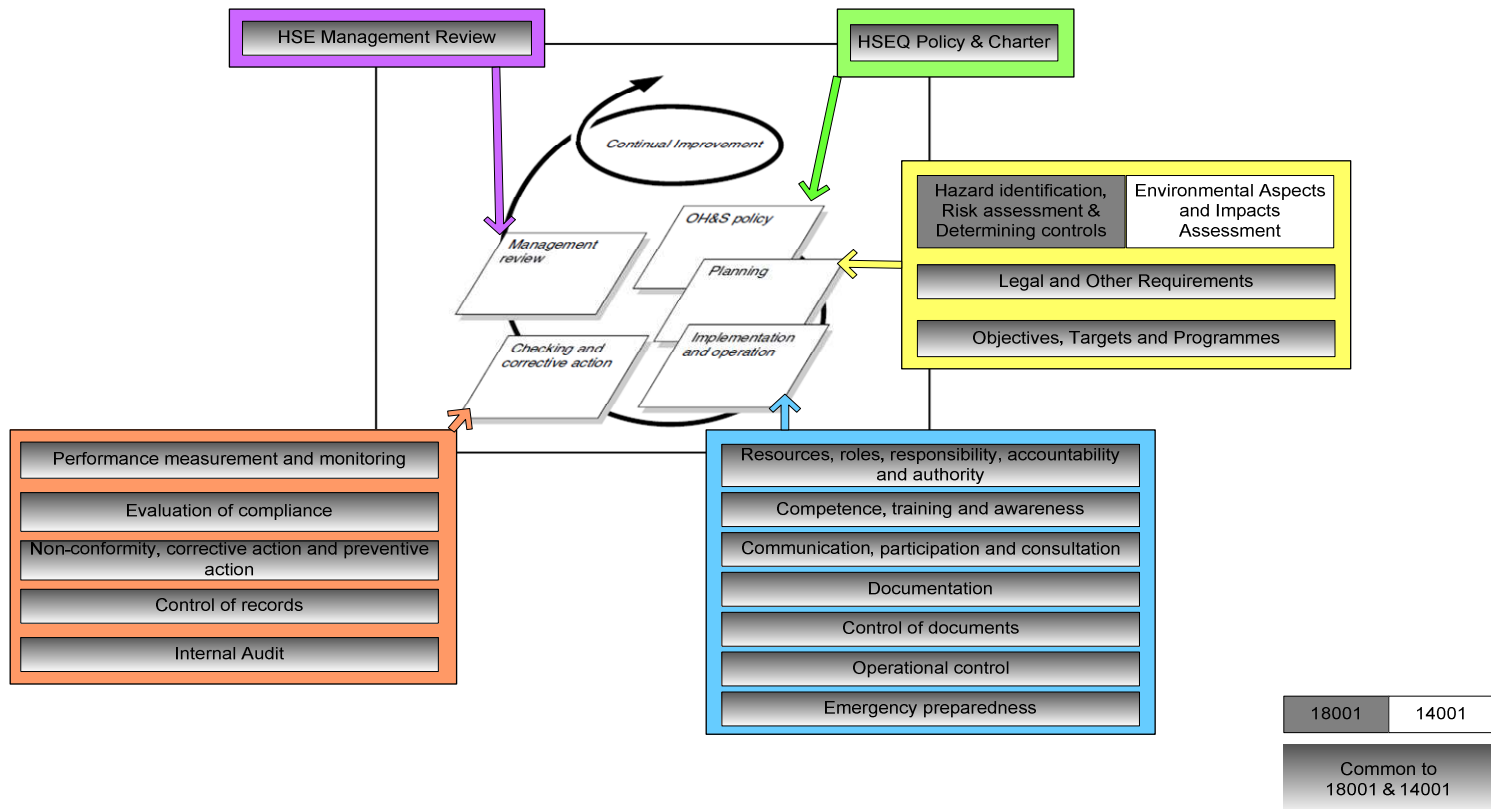
The scope of these management systems covers the whole of the Arkema site and its operations; including the Polynt Composites UK offices and staff with regards to Emergency procedures and fire precautions.

It covers conditions and factors that could affect the health and safety of all Arkema employees, contractor personnel, temporary workers, visitors, or any other person on the site, and all conditions or factors that could have an adverse effect on the environment.

Safety Health and Environmental Management Manual

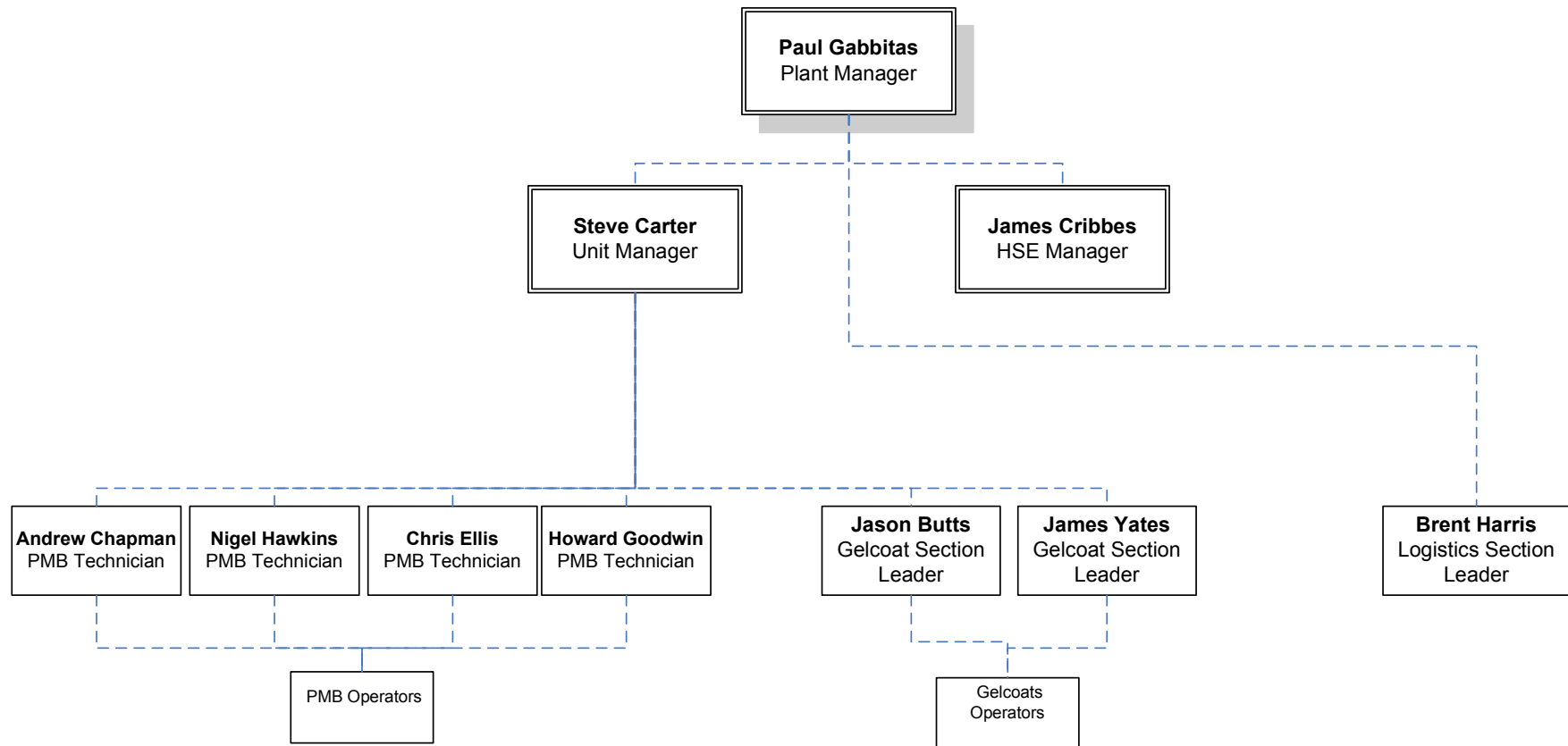
4. Arkema HSEQ Management System

Arkema, Stallingborough
HSE Management System Overview



Safety Health and Environmental Management Manual

4.1 Organisational Hierarchy



Safety Health and Environmental Management Manual

4.1.1 HSE Responsibilities

THE MANAGING DIRECTOR / PLANT MANAGER

- a) Has ultimate functional legal responsibility for all Safety and Environmental matters within the Arkema Coatings Resins Ltd, UK organisation.
- b) Has overall responsibility for ensuring that the Arkema Coatings Resins Ltd, HSEQ Policy and associated management systems and procedures are implemented within the Arkema Coatings Resins Ltd, UK operation.
- c) Is ultimately responsible for ensuring that adequate resources are allocated to fully implement the Safety, Health and Environmental (SHE) management programme including the successful achievement of any SHE objectives and targets set.
- d) Will ensure that those to whom particular SHE responsibilities have been delegated fully understand and meet those responsibilities and provide regular information on the SHE performance on the parts of the business under their control.
- e) Ensure that all SHE information, including progress on Arkema Coatings Resins Ltd. SHE Objectives and Targets is effectively communicated to all Arkema personnel and to the executive body.
- f) Will ensure that all SHE legislation relevant to the Arkema site is identified and implemented within national guidelines or Approved Codes of Practice.
- g) Liaise with the relevant regulatory bodies to ensure Arkema Coatings Resins Ltd's continued compliance with all statutory SHE regulations, fire precautions, authorisations and management systems. Will submit timely reports of any notifiable incidents to the relevant reporting authority and BU management as required.
- h) Will ensure that all reported SHE events, including near misses and hazards, will be investigated at the appropriate level, ensuring that any corrective actions identified are recorded and fully implemented.
- i) Is responsible for ensuring that the Arkema operation has suitable emergency response procedures covering the full range of emergency situations and ensures that staff is familiar and trained in their execution.
- j) In the event of an emergency, the Plant Manager will assume overall responsibility in coordinating and controlling our internal resources and personnel. He will also assist and provide information to the emergency services in order to bring any situation to a safe and swift conclusion.
- k) Is responsible for the development and maintenance of Arkema Coatings Resins Ltd, SHE internal audit system.
- l) Will ensure that all-new production plant, processes and products receive a suitable and sufficient PHA / risk assessment and evaluation of any relevant environmental aspects or impacts.
- m) Chair the monthly SHE Review meetings.

Safety Health and Environmental Management Manual

- n) Will ensure that Arkema Coatings Resins Ltd's operations conforms to all relevant environmental legislation including our 'Duty of Care' for waste disposal obligations.
- o) Will liaise with and report to the Environmental Agency (EA) all relevant information and results of monitoring required for the management and compliance of Arkema Coatings Resins Ltd's EPR authorisation.
- p) Will assist in the evaluation of any relevant environmental impacts or aspects of the Arkema site and in the identification and setting of environmental objectives and targets.
- q) Will investigate external environmental complaints ensuring that any corrective actions identified are recorded and fully implemented.
- r) Will advise when appropriate, customers and contractors on environmental matters in order to achieve our HSEQ policy objectives.

UNIT MANAGER (PRODUCTION MANAGER)

- a) The Unit Manager is responsible to the Plant Manager for the implementation of the Arkema Coatings Resins Ltd 'HSEQ Policy' and is responsible in assisting the Plant Manager in the maintenance, development and continual improvement of the company's Safety and Environmental Management Systems.
- b) Ensure that all SHE information, including Arkema Coatings Resins Ltd's SHE Objectives and Targets are effectively communicated to and understood by all the people working under their control.
- c) The Unit Manager has a direct responsibility to ensure that all people working within the PMB Building and Gelcoat Production are fully trained and competent to perform the tasks that are expected of them and to communicate and subsequent training needs that are identified.
- d) Will ensure that all staff receives the necessary environmental training in order for them to perform their duties in a competent and environmentally aware manner.
- e) Will ensure that all reported SHE Events, including near misses, will be investigated at the appropriate level, ensuring that any corrective actions identified are recorded and fully implemented.
- f) In the absence of the Plan Manager, the Unit Manager, In the event of an emergency will assume overall responsibility in co-ordinating and controlling our internal resources and personnel. He will also assist and provide information to the emergency services in order to bring any situation to a safe and swift conclusion.
- g) Will ass is the HSE Manager to ensure that all-new production plant, processes and products receive a suitable and sufficient risk assessment that ensure they are operated safely and that where necessary suitable method statements are prepared.

Safety Health and Environmental Management Manual

- h) Will also help to ensure that all substances used within the production operation have undergone a suitable and sufficient COSHH assessment and that exposure to substances is reduced to the lowest level reasonably practicable.
- i) Ensure that there is an adequate supply of appropriate PPE and that all people working within their control are fully conversant with the Arkema Coatings Resins Ltd rules regarding PPE and are conforming to them.
- j) Ensure that all plant and equipment within his control is maintained and operated in a safe condition/manner and that any faults or defects reported are rectified in a timely manner.
- k) Co-operate with any third party or Arkema Coatings Resins Ltd internal SHE audits and ensure that that any agreed corrective actions within their areas of control are fully implemented and effective.
- l) Perform safety inspections and SHE audits, reporting on same to interested parties.
- m) Perform QSHE event Root Cause Investigations and prepare / communicate reports to all interested parties as required.

HSE MANAGER

- a) In the absence of the Plant Manager & Production Manager, The HSE Manager assumes functional responsibility for all Safety and Environmental matters within Arkema Coatings Resins Ltd.
- b) In the event of the absence of both the Plant & Unit Managers during an emergency, the HSE Manager will assume overall responsibility in co-ordinating and controlling our internal resources and personnel. He will also assist and provide information to the emergency services in order to bring any situation to a safe and swift conclusion.
- c) He/she is directly responsible to the Plant Manager in ensuring Arkema Coatings Resins Ltd compliance with all HSE obligations including the development and maintenance of the HSEQ Policy and associated HSE Management Systems. As such the HSE Manager will act as the site HSEQ Coordinator and is responsible for reporting on the performance of the HSE Management System to senior management.
- d) The HSE Manager will identify and facilitate the setting and implementation of the Arkema sites SHE objectives and targets.
- e) The Process Support Manager will ensure that all HSE legislation relevant to the Arkema site is identified and implemented within national guidelines or Approved Codes of Practice.
- f) The HSE Manager is responsible for ensuring and monitoring compliance with all HSE rules and regulations at the Arkema site.

Safety Health and Environmental Management Manual

- g) Will ensure that all substances used within the site operation have undergone a suitable and sufficient COSHH assessment and that exposure to substances is reduced to the lowest level reasonably practicable.
- h) Will ensure that all reported HSE incidents, including near misses, will be investigated at the appropriate level, ensuring that any corrective actions identified are recorded and fully implemented.
- i) Is responsible for ensuring that the Arkema operation has suitable emergency response procedures covering the full range of emergency situations and ensures that staff is familiar and trained in their execution.
- j) Will ensure that all staff receives the necessary HSE training in order to ensure safe and environmentally sound working practices and knowledge.
- k) Will ensure that all-new plant, processes and products receive a suitable and sufficient risk assessment including evaluation of any relevant environmental impacts or aspects.
- l) Is responsible for the development and maintenance of Arkema Coatings Resins Ltd, HSE internal audit system.
- m) Liaise with the relevant regulatory bodies to ensure Arkema Coatings Resins Ltd's continued compliance with all statutory HSE regulations, fire precautions, authorisations and management systems. Will submit timely reports of any notifiable incidents to the relevant reporting authority.
- n) Will ensure that all relevant HSE information and reports are communicated effectively and that the quarterly Safety & Environmental Forums are scheduled and undertaken in a timely manner.
- o) Administers the COSHH & Material Safety Data Sheet system
- p) Assist with the compilation of monthly statistical reports including accident and incident statistics non-conformance and corrective actions administration.
- q) Administer the Accident & Incident database and Hazard / Near Miss reporting system.
- r) Administer & monitor the site Permit to Work system.
- s) The job holder will carry out any other duties as may be reasonably required by the Plant Manager.

Safety Health and Environmental Management Manual

ENGINEERING MANAGER / PROJECT ENGINEER (Role Currently vacant)

- a) Is responsible to the Plant Manager for the implementation of the Arkema Coatings Resins Ltd 'HSEQ Policy' and associated management systems within the Engineering Department.
- b) Is responsible for the safe management of all engineering & civil projects and the safe maintenance and modification of plant and work equipment.
- c) Will ensure that all new plant and equipment purchased fully conforms to all relevant legislative requirements and company standards and is suitable for purpose and safe to use.
- d) Is responsible for ensuring that statutory and insurance testing & inspection requirements are met and that suitable records are kept including relevant preventative maintenance and calibration checks.
- e) Will help to assess the risk and prepare method statements for non routine work.
- f) Responsible for the overall management and control of contractors on site including undertaking site safety inductions when required,
- g) Is responsible for ensuring that any waste generated by the engineering department or associated contractors is disposed of in the correct manner.
- h) Is responsible were necessary for the management of any projects involving the working with or removal of asbestos on the Arkema Coatings Resins Ltd site and will ensure that such work is carried out is undertaken in a legal and responsible manner.
- i) Will ensure that all SHE information, including Arkema Coatings Resins Ltd's SHE Objectives & Targets are effectively communicated to and understood by all the people working under his control.
- j) Will ensure that all people working under Engineering Department control are fully trained and competent to perform the tasks that are expected of them and to communicate any subsequent training needs that are identified.
- k) Will attend the appropriate monthly QSHE meetings, as requested by the Plant Manager.
- l) Will co-operate with any third party or Arkema Coatings Resins Ltd internal QSHE audits and ensure that that any agreed corrective actions within their areas of control are fully implemented and effective.

Safety Health and Environmental Management Manual

SECTION LEADERS & PMB TECHNICIANS

- a) Will be fully conversant with the Arkema Coatings Resins Ltd 'HSEQ Policy', associated manual and procedures. They are responsible for ensuring that they are fully implemented within their area of responsibility.
- b) Ensure that all plant and equipment faults or defects are reported immediately to ensure timely repair and maintenance is applied.
- c) Ensure that that all substances used within their production areas has undergone a suitable and sufficient COSHH assessment and that exposure to substances is reduced to the lowest level reasonably practicable. They must also ensure that all employees within their control are aware of the hazards associated with each substance.
- d) Assess all non-routine and maintenance operations within their control and ensures that an appropriate Permit to Work is issued.
- e) Ensure that all people working under their control are fully trained and competent to perform the tasks that are expected of them and to communicate any subsequent training needs that are identified.
- f) Ensure all QSHE incidents, including near misses, are reported to management and investigated, ensuring any corrective actions are fully implemented and effective
- g) Carry out and record Workplace Inspections. Ensuring that any identified actions are fully implemented and effective
- h) Ensure that any operation under their supervision does not create a significant environmental nuisance or pollution problem.
- i) Attend the appropriate QSHE meetings as requested by the Plant manager.
- j) Co-operate with any third party or Arkema Coatings Resins Ltd internal QSHE audits and ensure that that any agreed corrective actions within their areas of control are fully implemented and effective.
- k) In the event of an emergency the PMB technician will assume the role of Site Main Controller (SMC). It will be his duty in the initial stages of an emergency incident to assess and control the situation and direct the efforts of the Initial Response Team.

Safety Health and Environmental Management Manual

EMPLOYEES

- a) Will be fully conversant with the Arkema Coatings Resins Ltd 'HSEQ Policy' and associated site rules, manual and procedures.
- b) Are responsible for ensuring that they comply with all safe working practices, rules instructions and procedures.
- c) Will take reasonable care of their own health and safety and that of others who may be affected by their actions and refrain from any actions (or inactivity) which might endanger themselves, others or the environment.
- d) Will intervene if they identify any other person performing an unsafe act or breaching the sites SHE rules and policies, regardless of their position.
- e) Will co-operate with Arkema Coatings Resins Ltd management in order to meet the company's safety and environmental legal obligations.
- f) Will use all equipment safely and wear all Personal Protective Equipment (PPE) required by the company and will not intentionally or recklessly interfere with or misuse any equipment or articles provided in the interest of Safety, Health or the Environment.
- g) Will report all SHE events and hazards to management and will assist in any investigations carried out.
- h) Will report any defects in plant or equipment or other dangers immediately to their Unit Manager and the engineering department.
- i) Co-operate with any third party or Arkema Coatings Resins Ltd internal QSHE audits and ensure that that any agreed corrective actions assigned to them are fully implemented and carried out.
- j) Will notify Arkema Coatings Resins Ltd of any disability, illness or disease, which may constitute a hazard to them or other persons working at the Arkema site.
- k) If required, will act as part of an emergency response team as directed by the Site Main Controller (SMC).

Safety Health and Environmental Management Manual

4.2 Policy

Arkema defines its corporate responsibility for QSHE through its Health, Safety, Environment and Quality Charter, which is signed by the Chairman and CEO, Thierry Le Henaff and is displayed in various locations throughout the site.

In addition, Arkema Coatings Resins Ltd have defined and authorised the Arkema HSEQ system through the site's own 'HSEQ Policy'.

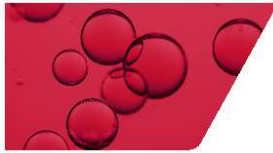
The Arkema Coatings Resins Ltd 'HSEQ Policy' is an integral part of our management system, and will be reviewed and updated as necessary and at least annually at the SHE Management review to ensure that it meets the developing needs of all stakeholders and the environment.

The Arkema Coatings Resins Ltd HSEQ Policy' Statement references the following:

- Personal Injury
- Property Damage
- Occupational health/industrial hygiene
- Compliance with legislation.
- Training
- Continued Improvement
- Contractors
- Transport
- Environment
- Waste Reduction
- Customers
- Suppliers
- Local Community
- Energy Efficiency

The Arkema Coatings Resins Ltd 'HSEQ Policy' has been signed by the UK Managing Director and copies of the Policy Statement can be found in the following places:

- The site's SHE Manual;
- Displayed at prominent locations throughout the site
- Used at the opening of training courses
- Used in the induction training.



HEALTH, SAFETY, ENVIRONMENT AND QUALITY CHARTER

Arkema places the safety and security of its activities, the health of people, the protection of the environment, and the satisfaction of its customers at the top of its priorities. Arkema endorses **Responsible Care**[®], a voluntary initiative centred on business and product stewardship, and based on a process of continuous progress. Our Group has two key programs related to our employees and contractors worldwide: **Safety in Action** to promote and reinforce a safety culture in every employee, and our **ESSENTIALS** programme which clearly defines a set of rules that will be followed without compromise.

Within the framework of corporate social responsibility, our **Common Ground**[®] programme is focused on our direct neighbours and communities where we operate and helps to develop relationships based on trust and meeting expectations with society at large.

To ensure the loyalty of our customers and partners, we need to anticipate their needs and are committed to an approach of continuous improvement. This approach relies in particular on listening attentively along with a spirit of innovation and operational excellence.

ARKEMA'S POLICY INCLUDES THE FOLLOWING KEY COMMITMENTS:

■ As a minimum, we observe local laws and regulations applicable to Arkema, wherever our Group conducts its activities. Where experience and process knowledge dictate, requirements can be more stringent.

■ Product stewardship takes into account health, safety and the protection of the environment throughout a product's life cycle, from its initial development stage.

■ Our safety, environment and quality management systems are adapted to each activity, and are based on the definition of improvement objectives, the implementation of action plans, the measurement of the results achieved, and the related control. They are evaluated on a regular basis.

■ Management is focused on creating and maintaining an environment for preventing unplanned events. Regular audits of all entities are conducted following the AIMS (Arkema Integrated Management System) protocol.

■ Our risk prevention policy entails the organization of contingency means and emergency response plans to control possible accidents; these measures are updated periodically, and tested during exercises conducted at regular intervals.

■ When choosing our industrial and commercial partners, we give priority to those who adhere to our health, safety, environment and quality policy.

■ We are convinced that all workplace injuries are preventable and every individual has a role and an essential responsibility for ensuring safety in their workplace and for the quality of products and services provided. Individual reviews ensure a regular evaluation of this requirement.

■ Arkema strives to be a preferred place to work by ensuring a diverse and healthy environment where individuals can develop and contribute to overall success.

■ In the field of health, safety, environment and quality, Arkema's approach is one of openness and dialog with its stakeholders.

■ In matters of security, Arkema strives to apply best in class technology and training for the protection of our people and facilities.

Thierry Le Hénaff
Chairman and CEO



Safety Health and Environmental Management Manual



HSEQ MANAGEMENT POLICY

Arkema Coatings Resins Limited operates the site at Stallingborough on behalf of a single customer, Polynt Composites. The Arkema Loss Control Policy is an integral part of the site management system, and will be reviewed and updated as necessary to meet the developing needs of all stakeholders and the environment.

The management and staff are all committed to the continual improvement of Quality, Health and Safety, and the Environment. This commitment is achieved through compliance with our legal and social obligations and any other applicable requirements and the implementation and maintenance of our Loss Control Management System which will satisfy the requirements of BS EN ISO 9001 and OHSAS 18001 as well as the Arkema's Health, Safety, Environment & Quality Charter which clearly defines the core values of the Organisation.

In order to optimise our QSHE performance, Arkema Coatings Resins (ACR) Stallingborough have established the following objectives:

- To evaluate our QSHE impacts and set objectives and targets to optimise ACR Stallingborough's QSHE performance in order to meet our stakeholders expectations.
- To develop, implement and maintain QSHE programs and practices that protect our employees, customers, contractors and visitors from accidental injury, property and plant damage, product failure and damage, pollution or nuisance to the local community.
- To establish the security of the site and to provide a safe place of work by a process of risk assessment and control thus ensuring that all machinery, plant, equipment and vehicles are maintained in a safe condition and ensuring that processes and systems of work are safe, without risk to health and the environment.
- To ensure that all process risks are assessed and controlled in order to satisfy our commitment to major accident prevention.
- To establish safe arrangements for the use, handling, storage and transportation of all hazardous substances, including exposure risk assessment, the provision of information and health surveillance where appropriate.
- We are committed to educating and training our employees to work within the precepts of our QSHE policy in order to ensure that each employee is aware of his or her role in our QSHE management system.
- To reduce, where possible, the amount of waste products arising from our activities and to guarantee that any residual waste that is produced is disposed of in a safe and environmentally sound manner, as required under our legal 'Duty of Care' requirements.
- To continually strive to reduce emissions to air, water and land and to ensure that systems that are installed to prevent pollution are fully effective.
- We will strive towards the highest possible energy efficiency in our operations in order to limit our effect upon the world's natural resources and the environment.
- We will encourage and assist customers, contractors and suppliers if required, to meet our own high QSHE standards and commitment to loss control and continual improvement.

Paul Gabbitas
Managing Director

May 2015

Safety Health and Environmental Management Manual

4.3 Planning

4.3.1 SHE Hazard Identification, Risk Assessment & Risk Control

Arkema Coatings Resins Ltd has established, implemented and maintains procedures for the completion of risk assessments in order to identify hazards arising out of work activities, assess the risk of the hazard occurring and to identify the steps required to eliminate the risks or reduce the risks to as low a level as reasonably practicable.

This also includes the identification of hazards and the assessment of risks associated with changes within the organisation, the HSE management system, or its activities prior to the introduction of such changes.

Reference Documents	
Proc 4.001	Risk Assessment
Proc 4.001f1	Risk Assessment form
Pol 5.001	Engineering and change management policy

In addition to the General Risk Assessments completed on site, the organisation completed specific risk assessments in the following areas:

4.3.1.1 Manual Handling

The organisation has established and maintains a procedure for assessing the risk to health from work activities that include manual handling deemed to be hazardous.

Reference Documents	
Pol 4.002	Manual Handling Risk Assessment Policy & Guidelines
Pol 4.002f1	Manual Handling Risk Assessment Form

4.3.1.2 Hazardous Substances

The organisation has established and maintains procedures for assessing the risk to health from hazardous substances arising from work activities on the site and determines from these assessments what precautions are required to handle them safely in order protect employees and other persons who may be exposed to substances hazardous to health.

The COSHH assessments are available to all site personnel via the internal COSHH database system.

Arkema Coatings Resins Ltd also maintains a system for ensuring that an up to date Manufacturers Safety Data Sheet (MSDS) is readily available to all interested parties. All RM MSDS's are available via the site internal MSDS database system.

Reference Documents	
Proc 4.002	COSHH Assessment Guide.
Proc 1.008	Maintenance of Material Safety Data Sheet System

4.3.1.3 Display Screen Equipment (DSE)

Arkema Coatings Resins Ltd has implemented and maintains policy that covers all aspects of health and safety aspects of working with DSE.

As part of this policy, work with Display Screen Equipment (DSE) is assessed against the requirements of the Health and Safety (Display Screen Equipment) Regulations 1992.

Safety Health and Environmental Management Manual

Reference Documents	
----------------------------	--

Pol 4.001	Display Screen Equipment Policy
Pol 4.001f1	Display Screen Equipment Risk Assessment

4.3.1.4 New Product /Raw Material Introduction

The organisation has established and maintains a procedure for assessing the risks associated with the introduction of new products/raw material on to the Arkema site.

Reference Documents	
----------------------------	--

Proc 1.016	RM Introduction/change procedure
-------------------	----------------------------------

4.3.1.5 Fire

Arkema Coatings Resins Ltd have completed and regularly review fire risk assessments for all areas of the site, in order to identify what we need to do to prevent fire and keep people safe. A competent person has been appointed to complete these assessments and reviews, with a written record of all fire risk assessments are held by the plant manager.

The company is committed to ensuring that suitable fire safety arrangements are in place, to eliminate and reduce the risk of fire, to provide staff training and to carry out fire drills.

In addition we will ensure clear means of escape, provide signs, notices and emergency lighting, fire detection and alarm, and extinguishers.

Reference Documents	
----------------------------	--

HSE Manager	Fire Risk Assessments
Man 3.001	Emergency Procedure Manual

4.3.1.6 Environmental Aspect & Impact Assessment

The organisation has established and maintains a procedure for assessing the environmental risks associated with all its operational and business activities.

Reference Documents	
----------------------------	--

Proc 7.007	Environmental Aspects and Impacts Assessment
-------------------	--

4.3.2 Legal and other Requirements.

The organisation has established and maintains a procedure to identify all applicable SHE legislative requirements, and any potential new, or changes to existing legislation.

To ensure this is effective, the organisation subscribes to the 'Newground' Legislation Update Service who provide an on line HSE legal register and compliance service which includes regular updates and monitoring of all applicable legislation.

Reference Documents	
----------------------------	--

Proc 1.009	Identification & Evaluation of SHE Legislation
-------------------	--

Safety Health and Environmental Management Manual

4.3.3 Objectives Targets and Programmes

The organisation has established and maintains measurable (where possible) Health, Safety and Environmental objectives and targets to ensure continuous improvement in line with the HSE policy.

The following areas are considered in establishing and reviewing objectives and targets:

- Legal requirements;
- Accident/Incident/Near Miss analysis;
- Results of hazard identification, risk assessments and existing controls;
- Results of internal and external audits;
- Significant environmental aspects;
- Technological development and options;
- Financial, operational and business requirements;
- Results of the SHE Management review;
- Views of all interested parties (internal and external), including employees.

4.3.3.1 SHE Management Programme.

The organisation has established, implemented and maintains a programme to ensure we meet and achieve our Health, Safety and Environmental objectives and targets. This programme includes:

- Clear designation of responsibility for achieving each objective and target.
- The means and the time frame by which they are to be achieved.

The programme is communicated to all interested parties and reviewed at regular planned intervals, and where necessary adjusted to ensure the objectives and targets are met, this includes at all quarterly safety committee meetings.

Reference Documents	
Proc 1.001	QSHE Management Program (Objectives and Targets)

4.4 Implementation and Operation

4.4.1 Resources, roles, accountability & authority

Top management take ultimate responsibility for HSE and the HSE management system, as documented section 4.1 above.

Top management are committed to:

- ensuring the availability of resources essential to establish, implement, maintain and improve the HSE management system;
- defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective HSE management.

Top management will lead by example and demonstrate commitment to continual improvement of HSE performance.

Safety Health and Environmental Management Manual

4.4.2 Competence, Training and Awareness.

The organisation ensures that any person(s) under its control performing tasks that can impact on HSE are competent and as such has established and maintains a procedure to identify training needs, conduct appropriate training and record any training undertaken.

In particular all employees will be made aware of:

- The importance of conformance with the HSE policy and procedures and their responsibilities under the HSE Management System.
- The significant HSE hazards and impacts, actual and potential, of their work activities.
- The potential consequences of departing from specified Manufacturing Operations, Instructions and procedures.

Reference Documents	
Pol 9.002	Training and Development Policy
Proc 6.002f2	Unionised Staff Training & Development Form
Proc 6.003	Induction to the workplace
Proc 9.001	Hiring and Placement Procedure
Proc 9.002	General induction
Proc 6.001	SHE Induction
Proc 6.001f1	SHE Induction Form
Proc 9.003	Induction Flowchart
Proc 6.006	Training Provider Approval Procedure & Form
Proc 6.004	One Point Lessons

4.4.2.1 Environmental Training & Competencies

Arkema Coatings Resins Ltd has established and maintains procedures to ensure the training and competencies of staff involved within the environmental management system and its requirements.

Reference Documents	
Proc 6.005	Environmental Awareness Training
Proc 7.010	Effluent testing, training for laboratory technicians

4.4.3 Communication, Participation & Consultation

Arkema Coatings Resins Ltd has established and maintains procedures to ensure sufficient internal and external communication with regards to its HSE hazards and HSE management system, which includes:

- Internal communication of HSE issues at all levels of the organisation
- Communication of HSE issues with contractors and visitors to the workplace
- Two-way communication with external interested parties regarding the HSE management system including its aspects and impacts performance.

All communication involving external parties including the public is responded to and appropriate records kept.

Safety Health and Environmental Management Manual

In addition, the organisation has established and maintains procedures to ensure sufficient participation and consultation with relevant interested parties, including:

- The involvement of workers in hazard identification risk assessments, incident investigations and policy or procedural reviews.
- Consultation of any changes relating to HSE issues.
- Consultation with contractors where any HSE changes may affect them.

Reference Documents	
Proc 1.007	SHE Consultation & Communication
Proc 10.014	Behavioural Based Safety

4.4.3.1 THE ESSENTIALS

The Stallingborough site follows the Arkema programme called “The Essentials”. The fourteen “Essentials” are simple and clear safety rules corresponding to everyday situations and derived from feedback and experience. Strict compliance with these rules is one of the key requirements to firmly establish our Safety culture over the long term.

Each Essential corresponds to a specific rule. For this rule to be suitably applied, a number of prerequisites need to be put in place. As an example, observing traffic regulations requires that these are first clearly defined, known to everyone, and adequately supported by signs and markings.

They must be known and applicable to everyone in an exemplary manner, with no allowance for compromise, across all Group sites, including Stallingborough. Employees are invited to suggest improvements that facilitate the application of a rule, and to report all substandard situations.

Any employee can and is encouraged to intervene with anyone else, whatever their position, whenever they encounter a breach of the site rules. The 14 Essentials are:

-  Road Traffic
-  Restricted Areas
-  Line Breaking Hazards
-  Alcohol and Drugs
-  Plant Operations
-  Management of Change (MOC)
-  Maintenance Work Practices
-  Wearing of PPE
-  Electrical Risk
-  Segregating Wastes
-  Traffic and Movement in Warehouses and Storage Areas
-  Plant Housekeeping
-  Housekeeping in Buildings
-  Cell Phones

Reference Documents	
	The Essentials Booklet
	Arkema Intranet

Safety Health and Environmental Management Manual

4.4.4 Documentation

Arkema Coatings Resins Ltd has developed and maintains various documentation to ensure that the HSE management system is adequately understood and effectively and efficiently operated.

The organisation has established and maintains HSE procedures and the management system manual in both a paper and electronic form in order to:

- Describe the core elements of the SHE Management System.
- Provide direction to related documentation and management system.

Reference Documents	
Man 1.001	The SHE Manual

4.4.5 Control of Documents

The company will ensure that documented procedures are established and maintained in order to control all documentation that relates to the requisites of the OSHAS 18001 and ISO 9001 standards.

- The control of all documentation relating to the SHE Management System is the responsibility of the Plant Manager
- A system has been implemented for establishing and maintaining the current revision status of documents to allow for identification and control of obsolete documents.
- All HSE documentation is controlled using the 'Quality Workbench Professional' (QWB) document control system.
- All employees have access to the documents stored the QWB system at point of use.
- Any change to The SHE manual or controlled documents will be approved by an appropriate authority, but can be requested by all users of the document.
- Documents will be reviewed after a period no greater than three years or if it is felt that they are no longer valid, or where there has been a significant change in work activities, processes, or an accident or incident has occurred.

Reference Documents	
Proc 2.008	Document Control

4.4.6 Operational Control

Arkema Coatings Resins Ltd has identified those activities that are critical to its operations and may have significant safety, health or environmental aspects and impacts.

Arkema Coatings Resins Ltd plans and manages these activities, including maintenance, in order to ensure that they are carried out safely by: -

- Establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the Arkema Coatings Resins Ltd HSEQ Policy and the objectives and targets.
- Stipulating operating criteria in the procedures.

Safety Health and Environmental Management Manual

- Establishing and maintaining procedures related to the identifiable significant environmental aspect of goods and services used by Arkema Coatings Resins Ltd.

4.4.6.1 Engineering Projects

Arkema Coatings Resins Ltd has established and maintains a system for evaluating HSE management considerations in new developments and projects. This includes the assessment of safety, health & environmental impacts and the need for any identified emergency procedures at all stages of the project.

Reference Documents	
Proc 5.008	Capital Project Procedure
Proc 5.08f1	Capital Project Proposal Form
Proc 5.018	SHE Engineering Project Risk Assessments
Proc 5.018f1	SHE Engineering Project Assessment Form
Proc 5.012	Commissioning Safety Review
Pol 5.001	Engineering & Change Management Policy
Proc 5.010	Engineering Request System
Proc 5.007	Planned Maintenance and Inspection
Proc 5.015	Identification of Critical Parts and Equipment

4.4.6.2 Plant Modifications

The risks arising from engineering plant modifications are controlled by 'Plant Modification' system and the Permit to Work system. Where appropriate, specific risk assessments and method statements will be prepared prior to the modifications being carried out.

Reference Documents	
Proc 5.009	Plant Modification Procedure
Proc 5.009f1	Plant Modification Procedure Form

4.4.6.3 Control of Contractors

All contractors will be selected by their ability to perform their function in a safe and environmentally friendly way.

To ensure all contractors working on the site are competent, Arkema have signed up to the ConCom scheme. ConCom is a collaborative client-led contractor auditing scheme which monitors and promotes competency of contractors employed on the Humber Bank sites.

This is achieved through the auditing of QHSE standards and promotes continuous improvement against common Safety and Competency Schemes across the Humber Bank Industries

No contractor will be allowed to start work on the site without first undergoing a SHE induction with an authorised member of staff.

Reference Documents	
Proc 5.011	Contractor Selection Procedure
Proc 6.001	SHE Induction Procedure
Proc 6.001f1	SHE Induction Form
Proc 5.016	Control of a Crane Contractor Team

Safety Health and Environmental Management Manual

4.4.6.4 Permits to Work

Arkema Coatings Resins Ltd has established a permit to work system for the control of non-routine operations at the site. The system is based on the assessment of risks and the application of control measures in order to protect people property, plant and the environment when non-routine operations are carried out.

Reference Documents	
Proc 5.001	Permits to Work
Proc 5.002	General Permit to Work Procedure
Proc 5.003	Confined Spaces Permit Procedure.
Proc 5.004	Hot Work Permit Procedure.
Proc 5.005	Confined Spaces Procedure

4.4.6.5 Working at Height

Arkema Coatings Resins Ltd has established and maintains procedures to ensure safe working at Height on the site.

Reference Documents	
Pol 1.003	Working at Height Policy.
Proc 5.006	Scaffolding Procedure
Proc 5.006f1	Scaffolding Pre-User Checks

4.4.6.6 Portable Electric Equipment Introduction & Testing

Arkema Coatings Resins Ltd has established and maintains procedures for the safe introduction, use and subsequent routine testing of all portable electrical equipment used on site.

Reference Documents	
Proc 5.017	Portable Electric Equipment Introduction & Testing Procedure.

4.4.6.7 Pressure Systems

All pressure systems and vessels are routinely inspected by a competent person as per the written scheme of examination in line with our statutory obligations under the Pressure Systems Safety Regulations 2000. The Engineering Manager maintains the written scheme and all associated records.

4.4.6.8 Lifting Equipment

A competent person as per the written scheme of inspection regularly inspects all lifting equipment as per our statutory obligations under Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). The inspections are intended to ensure that all lifting equipment is of good construction, sound material, adequate strength and are free of patent defect. The Engineering Manager maintains the written scheme and all associated records.

Safety Health and Environmental Management Manual

4.4.6.9 Local Exhaust Ventilation

In order to control exposure to hazardous substances Arkema Coatings Resins Ltd have provided where necessary Local Exhaust Ventilation (LEV). Since these systems are used as part of the risk controls of the work in that area it is most important that they are adequately designed and that they function effectively. To ensure this, all LEV will be regularly maintained and tested in line with out statutory obligations under the Control of Substances Hazardous to Health Regulations 2002 (as amended) at an interval not exceeding 14 months. The Engineering Manager will maintain a written scheme and keep all records of inspection.

4.4.6.10 Internal Transport

Fork Lifts

All fork trucks used on site are maintained on a routine basis by a company approved external supplier. Only authorised personnel with an externally approved licence are allowed to operate a forklift on the Arkema site. Each authorised person must successfully undergo a refresher/retest course every three years. An up to date copy of the licence will be kept within their training file.

Shunt Unit

For the purpose of internal transportation of road tankers around the Arkema site all shunt unit will be provided and maintained by a company approved external supplier. Only authorised personnel who have successfully undertaken internal shunt driving training are allowed to drive the units. Each authorised shunt driver must also successfully undergo a refresher/retest course every three years. An up to date copy of the licence will be kept within their training file.

Reference Documents	
Proc 1.003	Working with Mobile Plant
Proc 1.003f1	Hook Shunt Pre User Checks
Proc 1.003f2	Fork Lift Truck Pre User Checks
Proc 1.003f3	MEWP Pre User Checks

4.4.6.11 First Aid

As per our statutory obligations under the Health and Safety (First Aid) Regulations 1981, Arkema Coatings Resins Ltd will ensure that there are adequate facilities, equipment and numbers of first aiders appropriate to our circumstances.

Arkema Coatings Resins Ltd will provide training approved by the Health and Safety Executive for an adequate number of first-aiders having regard to the number of staff and the nature of our undertaking. The training will be provided prior to appointment and renewed every three years. Additional training may be given for first-aiders where this is thought necessary.

Employees will be provided with information on the first aid arrangements made by their employer, including the location of equipment, facilities and designated first aid personnel (first-aiders).

A fully equipped first aid room is situated within the Arkema office building complete with an oxygen resuscitator. We also have two defibrillators on site and further first aid kits, eyewash stations and emergency showers are situated throughout the site. All first aid equipment and emergency showers will be checked on a weekly basis by a trained first aider. The minimum First Aid provision for each department is:

Safety Health and Environmental Management Manual

Department	First Aider
A Shift	One First Aider
B Shift	One First Aider
C Shift	One First Aider
D Shift	One First Aider
Yard	One First Aider

Reference Documents	
Proc 1.002	First Aid Procedure

4.4.6.12 Health Surveillance

All employees must undergo a pre-employment health check with the external Occupational Health (OH) Services.

Under the Control of Substances Hazardous to Health Regulations 1999, reg. 11, where it is appropriate to protect the health of those operatives that are exposed to hazardous substances, they should be subject to suitable health surveillance.

Consequently due to the widespread use of anhydrides and solvents in the process of resin manufacture all personnel with the potential for exposure to any finished products or raw materials must undertake an annual spirometry test with the company nurse.

In addition if required, periodically blood samples may be required to further check that sensitisation has not occurred due to exposure to respiratory sensitisers.

The objective of such health surveillance is to detect any adverse health effects, in particular occupational asthma, at an early stage, thus enabling further harm to be prevented.

All employees are also offered on a voluntary basis an annual health check with the company nurse, which includes:

- Blood pressure checks
- Weight
- Audiometry
- Cholesterol checks

Reference Documents	
Proc 1.001	Health Monitoring

4.4.6.13 Alcohol & Drugs

The site has a Substance and Alcohol Misuse Policy which includes pre employment drug and alcohol testing as well as random periodic testing of employees and contractors. The alcohol and drug testing procedures below have been developed as a means of deterring employees, contractors and visitors from attending ACRL in a condition which renders them unfit for work and/or a safety risk to themselves and others. These testing practices underline the Company's commitment to the standards set by the Company Policy on substance misuse.

Reference Documents	
Pol 9.001	Substance and Alcohol Misuse Policy
Proc 9.009	Drug and Alcohol sample collection procedure manual

Safety Health and Environmental Management Manual

4.4.6.14 Personal Protective Equipment

All personnel will be issued with the appropriate personal protective equipment. This will be assessed and reviewed on a regular basis. Task specific Matrices have been developed and displayed around the site.

Reference Documents	
Proc 1.004	Personal Protective Equipment
Proc 1.004f1	Personal Protective Equipment Introduction & Trial Form
Proc 1.005	Approved Personal Protective Equipment List
Proc 1.006	Respiratory Personal Protective Equipment

4.4.6.15 Asbestos Management

Under the Control of Asbestos Regulations 2012 the company recognises and accepts its duty to manage asbestos.

- To identify the presence of all ACM's on site by the completion of suitable surveys.
- To identify, through a risk assessment, the areas of greatest risk and allow any control measures to be prioritised accordingly.
- To provide and maintain an Asbestos Register.
- To prevent exposure to the hazards associated with asbestos containing materials, or where this is not reasonably practicable, to reduce any exposure to as low as reasonably practicable by using appropriate control measures and having management systems in place.
- To promote awareness of the hazards of asbestos containing materials and the Company's Policy, Management and Procedures through training of staff.
- To freely provide information on asbestos to all interested parties.
- To implement effective asbestos containing materials management so that appropriate measures, such as monitoring, encapsulation, sealing, labelling, inspection or removal of the material are undertaken.
- To regularly review the Management of ACM's, the register and any associated procedures.

Reference Documents	
Pol 1.004	Asbestos Management Policy
PUBLIC drive	Asbestos Risk Register and Plan

4.4.6.16 Surface Water Control

Arkema Coatings Resins Ltd has procedures in place to ensure that all surface water is suitably controlled and contained to ensure the minimum of damage to any local water courses.

Reference Documents	
Proc 7.004	Interceptor Cleaning and Monitoring
Proc 7.005	Draining Bunds

4.4.6.17 Waste Duty of Care

Arkema Coatings Resins Ltd is committed to the reduction of waste as a result of its operations however when waste is generated, Arkema Coatings Resins Ltd will ensure that its disposal will be strictly in accordance with its 'Duty of Care' responsibilities.

Safety Health and Environmental Management Manual

Reference Documents	
TBC	Waste Duty of Care
Proc 7.001	Waste Disposal

4.4.6.18 Water Treatment (Legionella)

Arkema Coatings Resins Ltd has strict systems and procedures in place for the treatment and testing of its water systems to ensure that they are safe and free from risk of any harmful micro organisms such as Legionella in line with the Health and Safety Executive Guidance Document HS (G) 70 'The Control of Legionella, including Legionnaires' Disease'.

Reference Documents	
Proc 1.014	Legionella Control
Proc 5.020	Steam Boiler Treatment

4.4.7 Emergency Preparedness and Response

Arkema Coatings Resins Ltd has established and maintains procedures to identify the potential for and the response to accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them.

The organisation will review and revise, where necessary, its emergency preparedness and response procedures.

All emergency procedure are contained within the site Emergency Procedure Manual.

Reference Documents	
Man 3.001	Emergency Procedure Manual

4.5 Checking

4.5.1 Performance Measurement and monitoring

Arkema Coatings Resins Ltd will monitor and measure HSE performance in a variety of qualitative and quantitative ways, which will include both proactive and reactive measures of performance, including but not limited to:

- Inspections and safety tours
- Accident, incident and near miss statistics
- Ill-health and absence records
- Exposure monitoring
- Tracking progress on objectives, targets and actions
- Assessment of legal compliance
- Evaluation of effectiveness of training
- Results of internal and external audits
- Behavioural Based Safety Observations

4.5.1.1 Planned General Inspections

Arkema Coatings Resins Ltd has established and maintains a procedure to inspect and maintain high workplace standards of housekeeping, environmental control and safety.

Safety Health and Environmental Management Manual

Reference Documents	
Proc 10.002	Planned General Inspection Procedure
Public Drive	PGI Forms

4.5.1.2 Behavioural Based Safety (BBS) Observations

The site has implemented a Behaviour Based Safety process, whereby a team of trained observers undertake observations on workers performing their daily tasks. The observations include all site employees and contractors.

The objectives of this BBS process are to:

- Identify and reinforce safe behaviours
- Identify, evaluate, reduce and/or eliminate at risk behaviours
- Raise awareness to behavioural aspects of personal safety
- Promote consistent application and efficiency of process across all sites
- Support overall company Health, Safety, Environment and Quality objectives and reduce / eliminate injuries.
- Identify areas of risk to aid in efficient and effective direction of company resources including industrial hygiene, engineering and maintenance services for a safe workplace.
- Assist with the Safety in action program in the drive to zero.

Reference Documents	
TBC	BBS procedure
Process Drive	BBS tracking system

4.5.1.3 Monitoring & Measuring Emissions to Air

Arkema Coatings Resins Ltd has established and maintains procedures to monitor and measure on a regular basis the emissions from our processes to atmosphere in order to ensure our regulatory compliance with relevant environmental legislation and regulations.

Reference Documents	
Proc 7.002	Atmospheric VOC Monitoring
Proc 7.003	Dust Monitoring on PMB L.E.V.

4.5.1.4 Effluent Control & Treatment

The sites Biological Effluent Treatment plant is no longer in operation due to the cessation of coatings resins production and the impending EPR permit surrender.

We are awaiting guidance from the EA and local authority as to what effluent discharge testing will be required under a Part B permit. However, the site has maintained daily testing of the main interceptor effluent discharge from site in order to remain within the current permit consent limits.

Reference Documents	
TBC	Effluent Discharge Control

Safety Health and Environmental Management Manual

4.5.1.5 Environmental Reporting

ACR Ltd have a legal responsibility to report as per the sites EPR permit requirements these aspects are covered along with our obligations under the Packaging Waste Regulations in the following procedures.

Reference Documents	
TBC	Reporting to the Environment Agency
TBC	ACR Ltd Environmental Permit.

4.5.2 Evaluation of compliance

Arkema Coatings Resins Ltd have established, implemented and maintains procedures for the periodic evaluation of compliance with legal and other requirements and maintains records of such evaluations. In order to achieve this, a number of inputs are used, including but not limited to:

- Internal and external audits
- Results of regulator inspections
- Regular review of legal and other requirements
- Review of accidents, incidents and hazard reports
- Inspections and tours of site facilities
- Various testing and monitoring

4.5.3 Accident & Incident Investigation - Nonconformity, corrective and preventive action

4.5.3.1 Accident / Incident investigation

Arkema Coatings Resins Ltd has established, implemented and maintains procedures to record, investigate and analyse all QSHE accidents and incidents in order to:

- Determine any deficiencies within the HSE management systems.
- Identify the need for corrective and preventive actions.
- Communicate the results of such investigations
- Identify opportunities for continual improvement

The site uses the electronic on-line ERM system IMPACT to record and track all accidents, incidents and corrective and preventive actions.

Reference Documents	
Proc 8.001	QSHE Event Reporting & Investigation Procedure
Proc 8.002	Process Safety Incident (PSI) Reporting Procedure
	IMPACT ERM suite

4.5.3.2 Nonconformity, corrective action and preventive action

In addition to accident and incident investigations, Arkema Coatings Resins Ltd has established, implemented and maintains procedures for defining responsibility and authority for handling and investigating non-conformances; taking action to mitigate any impacts caused and for initiating and completing corrective and preventative actions.

Safety Health and Environmental Management Manual

The organisation will implement and record any changes in the documented procedures resulting from corrective or preventative action.

Engineering failures will be reported and tracked using an access database.

There is a hazard reporting system for recording and correcting any identified hazards on site.

Reference Documents	
Proc 8.003	Near Miss & Hazard Reporting
	See it Sort it Report it forms
Proc 5.010	Engineering Request system

4.5.4 Control of records

Records are maintained to demonstrate conformance to legislative and regulatory requirements and to the environmental management system standard.

All records will be legible, identifiable and traceable to the activity or product involved.

HSE records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss.

Reference Documents	
Proc 10.003	SHE Records & Archives

4.5.5 Internal Audits

Arkema Coatings Resins Ltd will systematically carry out internal audits of its SHE Management System, the function of such audits is: -

- To determine the compliance of the HSE Management System procedures in line with ISO 14001 and OSHAS 18001
- To determine the effectiveness of the SHE Management System in meeting specified HSE objectives.
- To identify corrective actions where non-conformance or limited effectiveness exists.

It is the responsibility of the Plant Manager to ensure that: -

- Internal audits are planned and implemented.
- Internal audits are scheduled on the basis of the importance of the activity to be audited.
- Suitably trained personnel independent of those having direct responsibility in the area audited conduct internal audits.
- Internal audits are recorded.
- The results of such audits are brought to the attention of the manager responsible in the area audited.
- The manager responsible for the area audited reviews the results of the audit and pursues timely corrective action if necessary.
- Follow-up audits verify and record the effectiveness of any corrective action taken.

Reference Documents	
Proc 10.001	Internal QSHE Auditing Procedure
TBC	Waste Auditing Procedure

Safety Health and Environmental Management Manual

	Waste Contractor Audit Guidelines
	Waste Contractor Audit Report

4.5.6 Management Review

Arkema Coatings Resins Ltd will review its Safety Health & Environmental management system every 12 months through the auspices of the SHE Management Review Meeting in order to ensure its continuing suitability, adequacy and effectiveness.

The reviews will address the possible need for change to policy, objectives and other elements of the SHE management system in light of results of audits, changes to legislation, the extent to which objectives and targets have been met and any concerns amongst relevant interested parties.

Reference Documents	
Proc 1.012	QSHE Management Review.