

ENVIRONMENAL POLICY MANUAL



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1. Scope

This Environmental Policy Manual specifies Multimodal Global Logistics Limited requirements for protection of the environment including reducing the use of natural resources, preventing emissions to the environment whilst providing worldwide project freight and supply chain management services including packing, warehousing and logistics at Multimodal Global Logistics Limited.

Environmental policy

MGL is an environmentally responsible organization and is committed to exceeding environmental legal, regulatory and statutory requirements. MGL is committed to reducing and eliminating any negative change to the environment wholly or partially resulting from the company's activities, products and services:

In order to achieve this policy MGL will:

Identify and reduce any emissions to air of particulate matter, volatile organic Compounds (VOC's) and odors;

Prevent releases to water;

Control waste management through the principles of recycling, reducing, repairing & reusing;

Prevent contamination of land;

Reduce the use of raw materials and natural resources;

Monitor and reduce noise emissions form our facilities; and, Implement and maintain an emergency response program to containing and minimize and accidental spills, contamination or releases.



2. Definitions

The definitions adopted by MGL are the definitions provided in ISO 9000-2000 Quality Management Systems Fundamentals and Vocabulary, and the ISO 14001 standard. The Definitions are provided in the Glossary of Terms.

3. Environmental management system requirements

MGL has established an environmental management system that is integrated with the Quality management system and principles of the ISO 9001 quality system manual. Where the ISO 9001 & ISO 14001 have common requirements a single procedure has been developed and implemented. Where requirements are specific to the environmental management system procedures have been developed and designated Environmental Procedures. The Quality / Environmental System menu defines the structure of the system.

Planning

Environmental Aspects Controlled Environmental Aspects

Controlled environmental aspects are aspects that MGL directly manage through its organizational structure and responsibilities. These aspects are controlled through the Environmental Management System consistent with the Environmental Policy. MGL has identified the aspects of its activities, products and services that can interact with the environment over which it has control. The aspects are identified in appendix 2 of this manual.



Influenced Environmental Aspects

Influenced Environmental Aspects are aspects generated on-site that the Facility/Plant Name does not directly control, but over which the Facility/Plant Name has some authority (i.e., through contractual obligations) or persuasion. Influenced Environmental Aspects would include trucking services contracted by other parties (Customers / Suppliers) delivering or picking up at MGL

In order to determine the significance of the aspect the preventive action procedure is applied in determining the environmental objectives. The aspects and objectives are kept current through review and adjustment during the Management Review Process. When establishing and reviewing the objectives, consideration of legal and other requirements, technological options and its financial, operational and business requirements, and the views of interested parties are taken into account.

Legal and other requirements

The procedure for identifying and accessing legal and other requirements defines the methods used to keep MGL updated and current on regulatory and legislatorial requirements that are applicable to the environmental aspects of the activities, products and services we provide. The primary method is through regular reviews of the Ealing Council websites. The responsibility for performance and frequency of the reviews is defined in the procedure Maintaining Legal and Regulatory requirements.

Objectives and targets

MGL has identified Environmental Aspects and the significance of the aspects. Environmental objectives and targets are determined and reviewed during the management review process. The Aspect / Objectives work sheet is used to plan the actions and activities that will be taken in order to achieve the objective.

Environmental management program



The environmental program is primarily aimed at achieving the objectives and targets. Procedures define the responsibility for achieving objectives and targets at each relevant function and level of the organization and the means and time-frame by which they are to be achieved.

Implementation and Operation Structure and responsibility

The management of MGL is strongly committed to The Environmental Management Program and had taken the responsibility for ensuring that the Environmental Management System requirements are established, implemented and maintained in accordance with the ISO 14001 Standard.

The documented procedures are the methods used to define and communicate the roles, responsibility and authorities of personnel in order to facilitate effective environmental management. The management establishes needs and provides the resources (including human resources) needed to implement and control the Quality / Environmental Management System.

Training, awareness and competence

MGL Procedure "resource requirements" defines the processes for identifying competencies of all personnel on the basis of education, training and/or experience. Personnel, whose work may create a significant impact upon the environment, are evaluated against competency requirements and provided training to ensure that the requirements are met.

The procedures for Resource Requirements ensures that employees at each all levels are aware of

a) the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;



- b) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;
- c) their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;
- d) the potential consequences of departure from specified operating procedures.



Communication

Internal

The Operations Office and warehouse interaction procedure defines the methods of communication between the office and the warehouse. The Emergency preparedness and response procedures are communicated through training, are available on the computer network and are posted throughout the warehouse.

External

All inquiries references from interested parties including the Environmental Protection Agency concerning the Multimodal Global Logistics Limited Environmental Policy or environmental issues are directed to the President who will provide the party with a copy of the Company Policy and may any other information reasonably requested. Any communication received from interested parties will become part of the input to the management review process.

Environmental management system documentation

The Quality and Environmental Management system is maintained on a shared directory on the computer network. Access to the system is electronic. All employees have an ICON on their desktop that takes them to the navigation menu of the system which identifies the core elements of the management system and their interaction and provides direction to related documentation.

Document control

The document control procedure defines requirements to: Approve documents prior to issue; Ensure that changes and issue status of documents are identified; Ensure that documents are available at their points of use;



Ensure that documents of external origin are identified and their distribution is controlled;

Ensure that files are closed and arranged in a uniform manner; Identify and prevent the unintended use of obsolete documents; and Review update and re-approve documents.

Operational control

MGL has established a set of quality, environmental and operating procedures procedures that contribute to the general awareness of environmental issues and support the environmental management system. Procedures also define the methods used to identify operations and activities that are associated with the significant environmental aspects.

Multimodal Global Logistics Limited plans operations and maintenance activities to ensure that they are carried out under specified conditions. The procedures stipulate operating criteria, provide the framework of the Quality / Environmental Management System. The operation and quality procedures identify the processes needed and define their application throughout the organization.



Emergency preparedness and response. Emergency

Multimodal Global Logistics Limited has developed an emergency response plan that addresses Environmental, health and safety response requirements. The plan identifies potential for and response to accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them. The emergency preparedness and response plan is reviewed by the management team during the management review process and after any occurrence of accidents or emergency situations.

Checking and Corrective Action Monitoring and measurement

Multimodal Global Logistics Limited has procedures for monitoring and measuring its processes and services. These procedures are also applied to the operations and activities that can have a significant impact on the environment, including recording of information to track performance, relevant operational controls and conformance with the environmental objectives and targets.

The procedure for Management review determines the need for periodically evaluating compliance with relevant environmental legislation and regulations. The procedure for Maintaining Legal and Regulatory requirements defines the responsibility for performing the reviews.

Nonconformance and corrective and preventive action

The procedure for the handling of reports of non-conformity, corrective and preventive action are applied to environmental issues and define the responsibilities and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Quality /

Environmental procedures defines:



Assessing nonconformities;

Determining and implementing action needed;

Determining the causes of nonconformities;

Evaluating the need for action to ensure that nonconformities do not recur; and Reviewing corrective action taken.

Records

Each procedure that defines requirements of the Quality and Environmental Management system also defines the records that are generated as a result of the activity. To ensure that records remain legible, readily identifiable and retrievable, the system procedures also define the identification, storage, protection, retrieval, retention time and disposition of records that they create.

Environmental management system audit

In order to determine whether the Quality and Environmental Management System is being effectively maintained, conforms to planned arrangements, to the requirements of the ISO 9001:2000 and ISO 14001 Standards and to system requirements established by MGL, a procedure for internal auditing has been developed and implemented. The procedure defines requirements for:

Planning of audits taking into consideration the status and importance of the processes and areas to be audited, as well as the results of previous audits;

The actions to be taken to eliminate detected nonconformities and their causes;

The responsibilities for reporting results of audits and maintaining records;

The selection of auditors and methods used to ensure their objectivity and impartiality; and

The verification and reporting of the results of the actions taken.



Management review

To ensure the effective implementation of actions to prevent the occurrence of potential non-conformances, the procedure for the handling of planned changes to the Quality / Environmental Management System defines:

Determining and implementing action needed;
Determining potential nonconformities and their causes;
Evaluating the need for action; and
Reviewing the action taken.

MGL ensures that the environmental protection measures remain in place while handling needed changes to the system. In order to determine performance in achieving objectives and determining the need for change, the Management Team reviews the performance of the system. Through meetings and the exchange of data relating to system performance, plans for improving the effectiveness of the companies Quality / Environmental Management System and services are developed.

To enable the management team to make decision relating to needed changes it is necessary to know the current status of the level of implementation of the system together with the status of any actions in progress. The following information is therefore provided for the planning process;

The results of the internal audit process provide the team with the information relating to the current level of implementation of the system.

The status of action taken to prevent the recurrence of non-conformities and follow-up actions from the changes provides details of activities still in progress. Performance of the system processes provides information that helps to uncover weaknesses in the system and can acts as an early warning system of those areas. Other changes that could affect the Quality / Environmental management system.



Recommendations for improvement.
Changes to legal and other requirements.
Comments from interested parties

The plans developed or updated during the review include;
Description of the actions to be taken;
Resources required;
Responsibilities and authorities for completion of the action; and
Time Lines for the action to be completed.

Details of sections of the plans that effect employees are communicated through meeting and postings