

Quality, Health, Safety, Environmental & Energy Manual

Document No: SM-41

Aspects & Impacts

To ensure that planned periodic review of the company's activities takes place and includes all activities conducted at the company's site and or by its mobile field force.

Methodology

- 1.0 Activity reviews will be recorded on and conducted in accordance with form Q080.
- 1.1 The Departmental Leader will conduct the environmental activity reviews assisted by the Quality, Health, Safety & Environmental (QHSE) team if appropriate.
- 1.2 The QHSE team and Departmental Leader will identify and shortlist a number of suggestions for the better control of the perceived aspects and impacts.
- 1.3 The measure of significance will be set by the QHSE team, assisted by the Departmental Leader. This measure is considered to be the most appropriate manner in which to gauge effect and provide performance indicators, any legal compliance in respect of an activity will automatically be the minimum set for any measure of significance. Compliance with the company's HS&E policy is always required and must be considered second only to legal compliance.
- 1.4 Priority for action will be determined on legal compliance, significance of shortfall in performance in relation to the environment and the likely hood of any perceived hazard actually manifesting itself.
 - i) Immediate: Any activity outside legal compliance.
 - ii) Urgent: Activities subject to and operating within legal parameters, but lacking such controls to ensure continued safe operation and compliance.
 - iii) High: Activities not subject to legal obligations but in direct conflict with the company's HS&E policy.
 - iv) Medium: Activities with no legal obligations but having the potential to impact directly and adversely.
 - v) Low: Activities having no legal obligations but having the potential to impact indirectly.

The scale and frequency of the operation under review will always be borne in mind when assigning priority categories.

- 1.5 Once satisfied that the review accurately reflects the department's activities and environmental status, the Departmental Manager will sign and date form Q080 and return it to the QHSE team.

Planned Periodic Review

- 2.0 The Aspect/Impact register will be reviewed not less than annually.
- 2.1 Departmental Leaders are responsible for conducting fresh reviews whenever a change to any process or procedure takes place. The potential for environmental damage should be considered whenever there is a change to operational procedures of any kind, this review will be conducted before the proposed changes are implemented.

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- 2.2 The QHSE Manager will submit details of such reviews to the senior managers attending Management Review Meetings for their consideration and possible setting of Objectives and Targets.

Records

- 3.0 The QHSE Manager will hold copies of all activity reviews (Q080) in perpetuity.
- 3.1 Audit reports will be distributed and retained in accordance with the procedure "Internal Auditing".