



4.4.1 Resources, Roles, Responsibility, Accountability and Authority:

The roles, responsibilities, accountability and authorities are defined for key personnel who manage, perform & verify activities having an effect on the impacts/risks of processes to ensure effective implementation of EOHS Management System defined at relevant functions and levels within the organization based on the work processes / functions.

Organization chart of KFL is given in Annex-I. Top Management is ultimate responsibility for establishment & effective implementation of EOHS Management system. Primary responsibility of implementation of EOHS management system & demonstration of commitment to provide resources essential to the implementation and control of the EOHS Management system lies with the Top management. These resources include human resources, infrastructure, specialized skills, technology, and financial resources.

A summary of EOHS responsibilities is as below:

Sl. No.	Responsibilities	Person (s) Responsible
1	Establish Overall Direction	Managing Director
2	Develop EOHS Policy	Managing Director & EOHS MR
3	Develop EOHS Objectives	CFT
4	Monitor Overall EOHS performance	EOHS MR & CFT
5	Assure Legal & Other Compliance	Legal Team
6	Ensure EOHS Compliance	EOHS MR & CFT
7	Comply with the defined procedures	All employees and trainees
8	Ensure Continual Improvement	MD, EOHS MR & CFT
9	Identify Supplier Expectations	Purchase Head

Management Representative has the primary responsibility for establishing, implementing and maintaining Environmental Management System and OHSAS Management system respectively. CFT comprising members provide support to EOHS MR. Individual roles and responsibilities for implementation of EOHS Management

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system are provided in the Procedure for **Resources, Roles, Responsibility, Accountability and Authority (EOHSP-05)**

Management Representative - Environmental, Occupational Safety and Health Management System:

Mr. Kiran Ambike has been appointed as the EOHS Management Representative who, irrespective of other responsibilities, has responsibilities and authorities for:

- Ensuring that Environmental, Occupational Health and Safety Management System requirements are established, implemented and maintained in accordance with ISO 14001:2004 and OHSAS 18001:2007 standard requirements.
- Organizing and conducting EOHS Management System Audit as well as identifying and recording the problems related to EOHS Management System to initiate, correct or provide solution through designated channels.
- Initiating, coordinating, recording and monitoring of Corrective and Preventive actions for the non-conformances relating to EOHS.
- Reporting on the performance of Environmental, Occupational Health & Safety Management System to Top Management for review & as a basis for its continual improvement.
- Organizing Management review meeting as per the defined frequency & for follow up actions.
- Interacting with external agencies like certification body and other interested parties.
- Recommendations for improvement of EOHS management system.

4.4.2 Competence, Training and Awareness:

KFL identifies, plans, monitors and records training needs for personnel, whose work may create a significant impact / risk in the work place. **KFL** has established, implemented and maintained a procedure on **Competence, Training & Awareness (EOHSP-06)** to train employees at each relevant function and level to ensure that they are aware of the importance of EOHS Management system.

HR department is responsible for maintaining employee-training records. Appropriate records are monitored and reviewed on a scheduled basis. Dept. Heads determine the competency of an employee. It is ensured that personnel who perform tasks, which can

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cause Significant Environmental Impacts / OH&S Risks, are competent for the specified tasks. The competence is ensured through appropriate education, training and/or experience. Appropriate training is also provided to the suppliers and contractors to comply with standard requirements

At KFL employees at each relevant function and level are made aware of:

- a) The importance of conformity with EOHS Policy, procedures and with other requirements of Environmental, Occupational Health & Safety Management System.
- b) The Significant Environmental Impacts and OH&S Risks, both actual and potential in their working area and the environmental benefits of improved personal performance.
- c) OH&S consequences, actual or potential of their work activities & OH&S benefits for improved personnel performance.
- d) Their roles and responsibilities in achieving conformity with the EOHS policy and procedures and with the requirements of the EOHS Management System, including Emergency Preparedness and Response.
- e) Potential consequences of departure from the specific operating procedures / Instructions.

Training procedure is also taken into account of differing levels of responsibility, ability, language, skills & literacy & risk involved in work place.

4.4.3 EOHS Communication, Participation and Consultation:

KFL has established, implemented & maintained a procedure for EOHS Communication, Participation and Consultation. (EOHSP-07)

EOHS Management system Communication:

An effective communication system has been established for

- Communicating internally between various levels and functions of KFL.
- Communicating with Contractors & visitors at work place.
- Receiving, documenting and responding to relevant communications from external interested parties regarding the organization’s aspects / hazards and EOHS Management System.

Internal communication is carried out through meetings, notices, circulars and electronic mails. The procedure defines the method of communication with regard to

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the EOHS Management System.

KFL has decided not to communicate externally about its significant aspects / hazards. However the legal Aspects as required by MPCB shall be displayed in the Company's website and shall be up to date.

If external communication received with regard to the significant Aspects / Hazards is considered for review and the decisions with regard to change (if any) in EOHS Management System are recorded and implemented and same will be communicated to concerned interested party.

Participation and Consultation on Health and Safety matters:

An effective system is established for participation & consultation of workers at KFL by:

- Appropriate involvement in hazard identification, risk assessment & determination of their control methods.
- Appropriate involvement in incident investigation
- Involvement in development of objectives

Safety committee meeting is conducted with employee representatives which includes divisional heads, deputy members & workers by HR Head.

The agenda for the meeting includes:

- Development and review of systems to manage OH & S risks.
- Any change that affects workplace safety and health.
- Details of Incident Investigation results.
- Any other health and safety matters.

Input for the meeting also includes feedback on concerns from interested parties including relevant information from external interested parties on OH&S matters. The decisions and further actions are recorded by HR and circulated to the concerned personnel for action. KFL ensures external interested parties are consulted about pertinent OH&S matters.

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4.4.4 EOHS Documentation:

The core elements of EOHS in KFL are defined and the interaction, directions to related documentation are provided in the manual and reference procedures respectively. KFL has established and documented EOHS Management system in four levels as given below:

Level 1: Environmental, Occupational Health & Safety Manual (EOHSM) – describes the core elements of the Environmental, Occupational Health & Safety Management System and their interaction. It outlines the structure of the document used in the EOHS Management System in line with ISO 14001: 2004 & OHSAS 18001:2007.

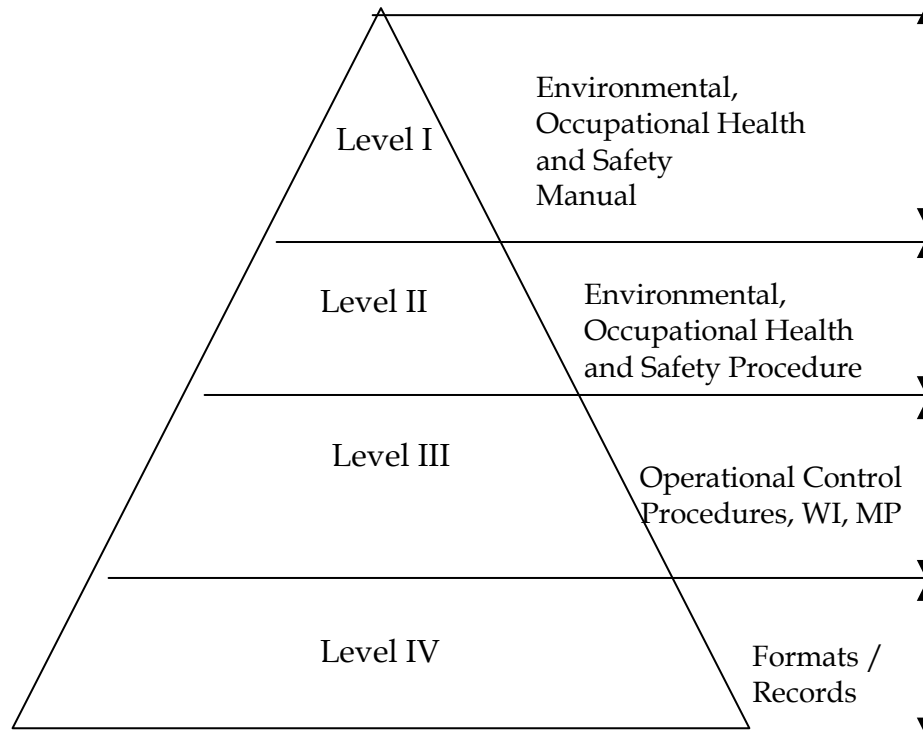
Level 2: Environmental, Occupational Health & Safety Procedures (EOHSP) – describe elaborately how various requirements of ISO 14001:2004 & OHSAS 18001:2007 are implemented. These procedures also make reference to Work Instructions /Operational control procedures / documents / records maintained.

Level 3: Operational Control Procedures, Work Instructions and Management Programmes for specific tasks affecting Environment, Occupational Health & Safety. Monitoring Plans address the method of monitoring and control of the various characteristics, which affect the environment, Health and safety.

Level 4: Formats used for recording and conveying data affecting the environment, Health & safety to demonstrate conformity to the requirements of Environmental, Occupational Health & Safety Management system.

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The four-tier documentation structure is followed as depicted in the pyramid below



4.4.5 Control of Documents:

KFL has established, implemented & maintained a procedure for **Control of EOHS Documents (EOHSP-08)**. The procedure ensures that current versions of the documents are available at relevant locations and obsolete documents are removed from all points of use and are suitably identified.

Management Representative issues the controlled documents. A Master list of documents is maintained by EOHSMR / concerned departmental heads giving the date and revision status of each of the documents and are readily available to preclude the use of obsolete documents.

Documents of external origin such as National and International standards are also covered under the document control procedures.

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Nature of change in document(s) is identified in the Amendment Record Sheet. Where obsolete documents are required to be kept for legality and knowledge purposes, suitable identification methods are established.

Wherever documents are in the form of electronic media, adequate data protection and security are provided. All the documents are controlled such that they are legible with revision no and date and are readily identifiable and maintained in an orderly manner.

4.4.6 Operational Control:

KFL has established, implemented & maintained a documented Procedure on **Operational Control (EOHSP-09)** for operations and activities that are associated with identified significant impacts / Risks where control methods need to be applied. These activities are carried out under specified conditions by:

- Establishing, implementing and maintaining operational control procedure to control situations where their absence could lead to deviations from the EOHS policy, objectives and targets.
- Controls related to purchased goods, equipment and services.
- Controls related to contractors and other visitors to the work place.
- Stipulating Operating criteria in the operational control procedures / monitoring plans.
- Establishing, implementing and maintaining procedures related to the identified significant aspects / risks of activities, products & services of KFL and communicating relevant procedures and requirements to suppliers and contractors.

4.4.7 Emergency preparedness and response:

KFL has established, implemented and maintained a procedure on **Emergency Preparedness and response (EOHSP-10)** to identify potential emergency situations, potential incidents and respond to them, for preventing and mitigating the environmental impacts / likely illness & injury that are associated with them.

Emergency Response Team (ERT) comprising of members from various departments will review and revise the Onsite emergency manual, after the occurrence of incidents or Emergency situations & after conduct mock drill. Mock Drills are conducted for testing the emergency preparedness and response once in six months.

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Mock Drills are conducted by involving relevant interested parties, neighbours & emergency services wherever practicable for testing emergency preparedness and response.

Reference Procedures:

1. Resources, roles, responsibility, accountability
And authority : EOHSP-05
2. Competence, training & awareness : EOHSP-06
3. Communication, participation and consultation : EOHSP-07
4. Control of documents : EOHSP-08
5. Operational control : EOHSP-09
6. Emergency preparedness & response : EOHSP-10

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