

PANCHAL ENGINEERS (I) PVT. LTD., & PANCHAL ENGINEERS, NASHIK	Internal Communication and Communication with External Parties	<b>Issue No. &amp; Date : 01/27-01-2007</b> <b>Rev. No:00</b> <b>Procedure No: DP/04</b>
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## EMS PROCEDURE: INTERNAL COMMUNICATIONS

### I. Purpose

The purpose of this procedure is to ensure effective and timely communication of environmentally-related information within the organization.

### II. Scope

This procedure describes processes for internal communications on various elements of the organization's environmental management system, including the environmental policy and objectives. This procedure also can be used for employee reporting of health & safety hazards, or for other related purposes.

### III. General

A variety of processes are used for internal communication on environmentally-related matters. The effectiveness of these communication processes are evaluated on an ongoing basis, through employee surveys, environmental training programs, organization audits and inspections, and informal discussions.

Major topics of internal communication include:

- environmental policy, objectives, and targets;
- environmental management roles and responsibilities;
- organization performance compared to environmental objectives and targets;
- environmental policies and procedures; and,
- hazards and emergency situations.

### IV. Procedure

#### *General*

- A. The Plant Manager is responsible for communicating the organization's environmental policies and procedures to all employees. The Plant Manager is also responsible for communicating roles and responsibilities for environmental management.
- B. Area and functional managers are responsible for communicating environmental targets (and performance vs. objectives and targets) to employees in their areas or functions, as well as to the management team.
- C. Area and functional leaders are responsible for communicating environmental procedures (and any changes to the procedures), results of accident and "near miss" investigations in their areas, and other significant environmentally-related information (such as upcoming training classes).
- D. The selection of the most appropriate mechanism(s) used for internal communication is left to the discretion of the responsible manager. Mechanisms that are used for various types of communications include, but are not limited to:
  - "all employee" meetings,
  - area environmental meetings,
  - workstation procedures,
  - bulletin boards and posters,
  - memoranda and employee letters, and
  - newsletters.

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### *Hazard and Emergency Reporting*

- A. All employees are responsible for reporting environmental or health & safety hazards or emergencies (including spills and fires) immediately upon discovery. Such hazards are reported to the Area Manager. If necessary, such hazards should also be reported to the appropriate emergency contacts (as identified in the emergency response procedures. The Area Manager in turn notifies the organization's environmental manager.
- B. If the Area Manager is not available, employees report environmental or health & safety hazards directly to the environmental manager.
- C. The organization's environmental manager maintains a log of all reported environmental or health & safety hazards. The environmental manager tracks the investigation and correction (as needed) for all reported hazards.
- D. Communication of the results of investigating / correcting reported hazards is the responsibility of the appropriate Area Manager.
- E. Emergency response procedures are described in Procedure for Emergency preparedness and response

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## EMS PROCEDURE: COMMUNICATIONS WITH EXTERNAL PARTIES

### I. Purpose

This procedure is intended to establish a process for outreach and communication with external parties regarding the organization's environmental management system (*Note: the organization should also consider external communication regarding its significant environmental aspects*).

### II. Scope

This procedure describes how the organization receives, documents, and responds to communications from external parties. In addition, it discusses proactive steps that the organization takes to maintain a meaningful dialogue with external parties on environmental matters.

### III. Definitions

**Interested Parties-** Individuals or groups with an interest in the environmental impacts of the organization's products, activities or services. These parties include regulators, local residents, employees, stockholders, insurers, customers, environmental groups and the general public

### IV. General

The organization uses a number of mechanisms to ensure effective communication with interested parties. These mechanisms include regulatory filings (such as permit applications and reports), open houses, the media, and informal discussions with regulators, community representatives, and local business leaders. To solicit the views of interested parties, the organization may use additional techniques, including (but not limited to) surveys, community advisory panels, newsletters, or informal meetings with representatives of external groups. General rules for external communications require that the information provided by the organization:

- be understandable and adequately explained to the recipient(s); and
- present an accurate and verifiable picture of the organization and its environmental management system, its environmental performance, or other related matters.

### V. Procedure

#### A. Management of Communications from External Parties

1. Inquiries and other communications (received by mail, fax, telephone, or in person) from external parties concerning the organization's EMS or environmental performance may be received by a number of the organization's representatives, including the Plant Manager, the environmental manager, and the human resources manager, among others. All such communications are reviewed by the Plant Manager or his / her designee to determine the appropriate response.
2. Communication with representatives of regulatory agencies is delegated to the organization's environmental manager, who maintains records of all such communications (both incoming and outgoing). In the absence of the environmental manager, communications with regulatory officials are delegated to the human resources manager.
3. Copies of all other written communications on environmental matters are maintained by the human resources manager. All non-written communications from external parties are documented using

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telephone logs or similar means. All records of external communications are maintained as discussed in Procedure for Records Management.

4. A record of the responses to all communications from external parties is maintained by the human resources manager in files designated for that purpose.

#### **B. Outreach to Interested Parties**

1. On an as-needed basis, the organization solicits the views of interested parties on its environmental management system, its environmental performance, and other related matters. In particular, such outreach is conducted when significant changes at the facility are being considered, such as facility expansion or other actions that might affect the actual or potential environmental impacts of the organization's products, activities, or services.

2. As part of the Management Review process, the team designated to conduct the Review evaluates proactive efforts to communicate with external parties. Based on this evaluation and other factors, the organization's management determines the need for outreach with external parties in the coming year and how such communications can be carried out most effectively.

#### **C. External Hazard and Emergency Communication**

All external communication regarding emergency response are addressed in Procedure for Emergency preparedness and response

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