	ENVIRONMENTAL, OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM PROCEDURE	Doc. No. : EOHSP-12
		Rev. No. : 00
	EVALUATION OF COMPLIANCE	Date : 02.04.12
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1.0 PURPOSE:

To establish, implement & maintain a procedure to evaluate and update applicable Environmental, Occupational Health and Safety legal and other requirements applicable to EOHS Management System of KFL.

2.0 SCOPE:

Evaluation of legal & other requirements applicable to all the activities, products & services covered under the scope of EOHS Management System.

3.0 RESPONSIBILITY:

Legal Team Members

4.0 DEFINITIONS:

Legal Requirements: These are regulatory requirements as defined by the Central or State regulatory authorities to which the KFL is liable to identify and comply with.

Other Requirements: Any customer specific requirements, statutory requirements by financial bodies, corporate specific requirements & any other agreements with public authorities.


5.0 PROCEDURE:

5.1 The Legal team of KFL periodically carry out the evaluation of all legal & other requirements compliance once in Six months. Periodicity of evaluation of compliance will vary for different legal & other requirements. The associated records are maintained.

5.2 The method adopted in evaluating legal & other requirements is briefed below. Each of the identified legislation such as act / rule / consent / other requirement is studied for every condition in the format specified for evaluating the compliance. Each of the condition is rated for compliance using the following grades.

1. Fulfilled - Fully complied.
2. Not relevant - any condition in the legal consents, which is not applicable to KFL.
3. Still Open - but can be rectified by taking corrective action.
4. Not fulfilled - This requires an action plan to achieve the compliance through the Management Program.

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Signature			
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Date	02.04.2012	02.04.2012	02.04.2012

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5.3 The evaluation of requirements to be carried out once in Six Months or whenever any new legal requirement is introduced by State Pollution Control Board or Central Pollution Control Board / any other regulatory authority and is applicable to the firm.

The evaluation covers

- Licence, consents, authorization
- Notifications, publications by government authorities and reply
- Compliance to other requirements
- Updating on legal requirements and other requirements

5.4 The application for renewal of consents/authorization under government statutory requirements will be given in advance as specified in the Act / Rule. Renewal frequency mentioned in the table may be altered as per the notification / intimation from the government authorities from time to time.

5.5 **Corrective Action:** This includes the steps taken to rectify the non-compliance observed against any of the applicable legal / other requirements. When the applicable condition is rated as 3 or 4 it is reviewed for the appropriate corrective action and action plan or if necessary EOHS management program is initiated with the responsibility and target date.

6.0 Document / record reference:

S. No	Document /Record Description	Reference No.
1	Legal Register	EOHS-RG-01

7.0 ISO & OHSAS ref

Clause ref 4.5.2 of ISO 14001:2004 & OHSAS 18001:2007

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