	<b>VINATI ORGANICS LIMITED</b>		
	<b>EHS PROCEDURE</b>		
	<b>PROCEDURE FOR ENVIRONMENTAL REVIEW OF NEW PROCESSES, MATERIALS, AND PROJECTS</b>	EHS Procedure	16
		Issue Date	27-09-2010
		Review Date	25-01-2012
ISO Clause No			

### 1.0 Purpose

This procedure defines the method for identifying and evaluating the environmental issues of new processes, materials, and projects at *EAF Steel Company* to:

- Ensure that appropriate consideration is given to environmental issues prior to new process, material, or project initiation;
- Ensure that new environmental aspects generated by processes, materials, or projects are identified and their significance evaluated; and
- Provide a mechanism for the amendment of EMS elements, the list of SEAs, and Programs, where relevant, to ensure that the EMS applies to such processes, materials, or projects.

### 2.0 Activities Affected

All areas and departments

### 3.0 Forms Used

- 3.1 Environmental Checklist for New Processes and Materials (F-004.01)
- 3.2 Environmental Checklist for New Projects (F-004.02)
- 3.3 Project Evaluation Form
- 3.4 EMS Implementation Form

### 4.0 References

- 4.1 Procedure for Environmental Aspects, Objectives and Targets, and Programs (P003)
- 4.2 Procedure for Environmental Records (P-012)

### 5.0 Definitions and Acronyms

5.1 Initiating Activity:

### 6.0 Exclusions

None

### 7.0 Procedure

7.1 Areas/departments initiate the Environmental Checklist for New Processes and Materials (F-004.01) when a process or material (not project-specific) is introduced.

7.1.1 The “initiating activity” or designee shall identify and evaluate environmental issues associated with the new process/material.

7.1.1.1 A summary of this evaluation shall be documented on the Environmental Checklist for New Processes and Materials (F-004.01).


7.1.1.2 This process may be undertaken in liaison with the EMS Coordinator (or other competent individual) at the discretion of the initiating activity.

7.1.1.3 This environmental review shall include an identification of any environmental aspects and requirements for obtaining approvals from environmental regulatory agencies.

7.1.1.4 The initiating activity shall submit the completed Environmental Checklist for New Processes and Materials (F-004.01) for review to the Environmental Management Representative.

### Record of revision:

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			<b>S.P.GUNJAL</b>	<b>J.A. ASHAR</b>	
<b>Rev. No.</b>	<b>Rev. Date</b>	<b>NATURE OF CHANGE</b>	<b>Prepared By E M.R.</b>	<b>Approved By COO</b>	<b>Page</b>

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7.1.2 The Environmental Management Representative (EMR), or designee, shall review the proposed process and/or material to ensure that all relevant environmental issues have been identified

7.1.2.1 If incomplete, the EMR shall return the Environmental Checklist for New Processes and Materials (F-004.01) to the initiating activity for correction.

7.1.3 Environmental aspects associated with new process and/or material shall be evaluated for significance by the EMR and Cross Functional Team per the Procedure for Environmental Aspects, Objectives and Targets, and Programs (P-003).

7.1.3 The EMR will submit changes to the EMS resulting from the significance determination for review and approval by top management.

7.1.4 Following appropriate review, the EMR, or designee, may approve the process and/or material by returning the Environmental Checklist for New Processes and Materials (F-004.01) to the initiating activity for further processing.

7.1.4.1 If a new process and/or material is not acceptable, the initiating activity will coordinate any necessary actions to satisfy concerns identified.

7.1.5 The initiating activity in conjunction with the Environmental Management Representative, or designee, will coordinate any necessary prevention, mitigation, or control activities associated with the process/material/project.

7.2 Project Manager should initiate the Environmental Checklist for New Projects (F004.02) when a new project is introduced.

7.2.1 The Project Manager shall identify and evaluate environmental issues associated with the new project.

7.2.1.1 A summary of this evaluation shall be documented on the Environmental Checklist for New Projects (F-004.02).

7.2.1.2 This process may be undertaken in liaison with the EMS Coordinator (or other competent individual) at the discretion of the Project Manager.

7.2.1.3 This environmental review shall include an identification of any existing companywide environmental aspects, objectives and targets, Programs, work instructions, best management practices, and requirements for obtaining approvals from environmental regulatory agencies (see Compliance Checklist F1-3) that apply to this project.

7.2.1.4 This environmental review shall include an identification of any new project-specific environmental aspects to be evaluated for significance by the EMR and Cross Functional Team per the Procedure for Environmental Aspects, Objectives and Targets, and Programs

7.2.1.5 The Project Manager shall submit the completed Environmental Checklist for New Projects (F-004.02) for review to the EMR.

7.2.2 The EMR, or designee, shall review the proposed project to ensure that all relevant environmental issues have been identified.

7.2.2.1 If incomplete, the EMR shall return the Environmental Checklist for New Projects (F-004.02) to the Project Manager for correction.

7.2.3 The EMR will submit changes to the EMS resulting from the significance determination for review and approval by top management.


7.2.4 Following appropriate review, the EMR, or designee, may approve the new project review by returning the Environmental Checklist for New Projects (F-004.02) to the initiating activity for further processing.

7.2.4.1 If the new project review is not acceptable, the initiating activity will coordinate any necessary actions to satisfy concerns identified.

7.2.5 The Project Manager in conjunction with the EMR, or designee, will coordinate any necessary prevention, mitigation, or control activities associated with the new project.

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			<b>S.P.GUNJAL</b>	<b>J.A. ASHAR</b>	
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7.2.6 The Project Manager in conjunction with the EMS Coordinator will prepare site specific EMS Manual, including the following:

7.2.6.1 Description of EMS

7.2.6.2 Environmental Policy

7.2.6.3 Organizational Chart

7.2.6.4 Compliance Checklist

7.2.6.5 EMS Implementation Form (applicable companywide aspects indicated and project-specific information added to bottom)

7.2.6.6 Copies of applicable procedures, Programs, work instructions, and best management practices, and other applicable forms

7.2.7 The Project Manager shall maintain the project-specific EMS Manual and generated project-specific EMS Records onsite with the associated project files.

7.2.8 The Project Manager shall send updated EMS Implementation Form and Project Evaluation Form periodically to company headquarters for inclusion of project information in companywide EMS.

7.2.9 At the completion of the project, the Project Manager shall send a final EMS Implementation form and Project Evaluation Form to company headquarters for inclusion of project information in companywide EMS.

7.2.10 At the completion of project, project specific EMS manual will be filed with associated project specific files.

**8.0 General Rules** None

**9.0 Frequency** Ongoing

**10.0 Records** Records shall be retained consistent with the Procedure for Environmental Records (P012).

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