



## Environmental Manual

Conforms to ISO 14001:2015

### Revision History

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## 1 Introduction

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Pilot Group has developed and implemented an Environmental Management System (EMS), which allows us to:

- document and improve our operations to protect the environment through the prevention or mitigation of adverse environmental impacts
- apply a life cycle perspective to the way our products and services are designed, manufactured, distributed, consumed and disposed of, including the avoidance of knowingly shifting adverse impacts elsewhere within the life cycle
- demonstrate our ability to consistently provide products and services that meet our compliance obligations
- drive improvement and thereby enhance our environmental performance

This manual describes our EMS and sets out the authorities and responsibilities of staff operating within it, as well as referencing those procedures and activities that fall within its scope.

### 1.1 ISO 14001:2015

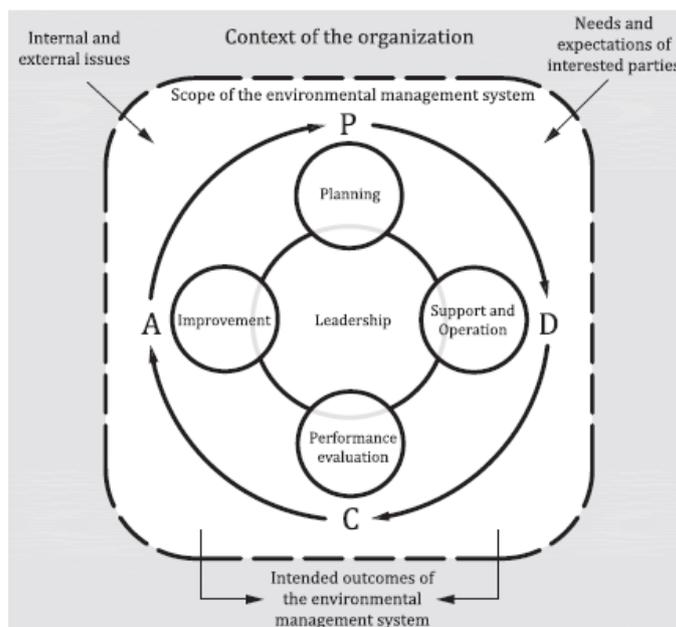
Achieving a balance between the three components of sustainability; environment, society and the economy, is essential to meet the needs of the present without compromising the ability of future generations to meet their needs.

We have implemented an environmental management system (EMS) with the aim of contributing to the environmental component of sustainability.

Our EMS has been developed in compliance with the ISO 14001:2015 standard which provides us with a framework to protect the environment and respond to changing environmental conditions in balance with socioeconomic needs.

### 1.2 Plan-Do-Check-Act (PDCA) cycle

Management of our processes and our EMS as a whole is achieved using the Plan-Do-Check-Act (PDCA) cycle with an overall focus on using risk-based-thinking to take advantage of opportunities and prevent undesirable results.



## 2 References

Standard	Title	Description
ISO 14001:2015	Environmental Management Systems	Requirements

## 3 Terms and Definitions

The terminology used in our EMS reflects both that used in ISO 14001:2015 and:

- standard business/environmental terminology
- terms and vocabulary typically used within our scope of activity
- terms typically used in standards and regulations as they relate to our scope of activity

Definitions:

- “compliance obligations” means both those laws and other requirements, be they national or international, that apply to us as an organisation plus any other commitments we enter into, or apply voluntarily, such as contracts, agreements, codes, and standards
- “Top Management”, as referred to by ISO, is represented in Pilot Group by the Group’s SHEQ Manager who in turn liaises with the Senior Management Teams
- “staff” are all those working under our control
- “we” and “our” refer to Pilot Group which is inclusive of TWM Traffic Controls and Vickers Electronics

## 4 Environmental Context

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### 4.1 Understanding our business, and

### 4.2 Understanding the needs and expectations of interested parties

To fully understand our business we identify all key internal and external issues that are relevant to our operations and which affect our ability to achieve the intended outcomes of our EMS.

This involves:

- identifying those interested parties (“stakeholders”) that are relevant to our EMS
- understanding the relevant needs and expectations (the requirements) of these interested parties
- determining which of these needs and expectations become compliance obligations
- identifying and understanding those internal and external environmental issues of concern that impact on our activities/stakeholders
- understanding the scope of our EMS

Many such issues are identified through an analysis of risks facing either ourselves or our stakeholders.

Our stakeholders and relevant internal and external issues are identified and are monitored as part of environmental management reviews and updated as necessary.

The methodology we employ to achieve this understanding is set out in our [EMS Identification of Environmental Context Procedure](#) and the results are recorded in our [Environmental Context Log](#).

### 4.3 Scope of our environmental management system

#### 4.3.1 Scope

Our EMS satisfies the requirements of ISO 14001:2015 and, based on our understanding of our business, and the needs and expectations of our stakeholders, addresses and supports our processes for the design, development, manufacturing, installation and servicing of our products.

The Manufacture, Supply, Installation and Maintenance of Energy Management Systems and LED Traffic Control Management. When determining this scope, we have considered:

- our organisation and its context (both internal and external issues)
- the needs and expectations of interested parties
- our compliance obligations
- our organisational units, functions and physical boundaries
- our activities, products and services
- our authority and ability to exercise control and influence

### **4.3.2 Exclusions – non applicable to 14001**

### **4.3.3 Business locations within the scope**

This EMS applies to our business activities at:

Pilot Group HQ – 15 Carnarvon Street, Manchester, M3 1HJ

TWM Traffic Controls – Oasis Business Park, Road One, Winsford, CW7 3RY

Vickers Electronics – Unit 2, Merlin Park, The Furrows, Stretford, M32 0SZ

Off site installations at Customer Sites.

## **4.4 Environmental management system**

To achieve our Environmental Objectives, we have established, implemented, maintained and continually improve our EMS, including the processes needed and their interactions.

Our EMS takes into consideration the needs and expectations of interested parties.

# **5 Leadership**

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## **5.1 Leadership and commitment**

Our Senior Management Team demonstrates leadership and commitment to achieving the objectives of our EMS, by taking accountability for its effectiveness and by providing direction and support ensuring that:

- our Environmental Policy and Environmental Objectives are compatible with our strategic direction and context
- our EMS is fully integrated into our business processes as appropriate<sup>1</sup>
- our EMS is suitably resourced
- the importance of effective environmental management, and of conforming to the requirements of our EMS, are clearly communicated
- our EMS achieves its intended outcomes
- all staff are encouraged to contribute to the effectiveness of our EMS
- continual improvement is actively promoted
- our environmental policies, objectives and targets are, where appropriate, reflected in individual performance objectives

## **5.2 Environmental Policy**

The Group, when carrying out duties relating to Energy Management and Traffic Controls will commit to:

- Adopting a good environmental management practice
- preventing pollution and harm to the environment

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<sup>1</sup> The term 'business' used above should be interpreted broadly to mean those activities that are core to the purposes of the organisation's existence.

- continually improve our EMS
- continually improve our environmental performance by setting environmental objectives
- comply with all applicable legal and other obligations

The Group will consider that, in accordance with ISO 14001, this Environmental Policy:

- is appropriate to our purpose and context, including the nature, scale and environmental impacts of our activities, products and services
- provides a framework for setting Environmental Objectives
- includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to our context
- includes a commitment to fulfil our compliance obligations
- includes a commitment to continuously improve the performance of the EMS

This policy governs our day-to-day operations to ensure good environmental outcomes and is communicated and implemented throughout our organisation. Our Environmental Policy is made available as a stand-alone document and widely distributed, including during induction and to interested parties.

Our Environmental Policy is to be reviewed annually, as part of the environmental management review programme, or as required to incorporate the changing needs and expectations of relevant interested parties or the risks and opportunities identified by the management process.

### **5.3 Organisational roles, responsibilities and authorities**

Our Senior Management Team has assigned responsibilities and authorities for all roles relevant to the full and proper implementation, operation and maintenance of this management system. These are communicated through the combination of our Organisation Chart and internal Job Titles.

The Senior Management Team has assigned responsibility and authority for:

- ensuring that the EMS conforms to applicable standards
- ensuring that EMS processes are delivering their intended outputs
- reporting on the performance of the EMS
- ensuring the promotion of a focus on environmental matters throughout the organisation
- ensuring that the integrity of the EMS is maintained when changes are planned and implemented

All managers are expected to demonstrate their commitment to the implementation and improvement of the EMS through:

- the provision of necessary resources
- their involvement in the internal audit process
- their proactive involvement in continual improvement activities

- focusing on the improvement of key system processes

All managers are responsible for the implementation of the policies, processes and systems described in this manual and for planning, controlling and suitably resourcing the EMS processes within their area of responsibility.

All staff are responsible for the implementation of the environmental policies and procedures applicable to processes they perform and are encouraged to identify and report any known or potential problems and to recommend related solutions.

All staff responsible for environmental outcomes have the authority to stop activities to address environmental problems.

## 6 Planning

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### 6.1 Addressing risks and opportunities

#### 6.1.1 General

In creating our EMS, we have identified the risks and opportunities that need to be addressed, based particularly on: *4.1 Understanding our business*, *4.2 Understanding the needs and expectations of interested parties* and *6.1.3 Compliance Obligations* but also including all other aspects of the EMS. Those risks and opportunities have been addressed to:

- ensure that the EMS can achieve its intended outcomes
- enhance desirable effects
- prevent, or reduce, undesirable effects, including the potential for external environmental conditions to affect us
- achieve continual improvement

When managing risks and opportunities:

- we consider risks and opportunities when taking actions within the EMS, as well as when implementing or improving the EMS
- formal risk management may not be utilised in all circumstances and the level of risk assessment, analysis, actions and recording will be to a level appropriate to each circumstance
- the actions we take to address environmental risks and opportunities are proportionate to their potential impact

We operate and maintain arrangements for determining our environmental risks and opportunities as set out in our EMS Identification of Environmental Aspects and Significant Impacts Procedure.

We operate and maintain arrangements for determining potential emergencies as set out in our EMS Environmental Emergency Preparedness and Response Procedure.

#### 6.1.2 Environmental aspects

We operate and maintain arrangements to document, review and communicate our environmental aspects and significant impacts as set out in the EMS Identification of Environmental Aspects and Significant Impacts Procedure.

By means of this procedure we:

- determine those environmental aspects and significant impacts arising from our activities, products and services that fall within the scope of our EMS
- identify their environmental impacts and the degree to which we can control, and influence them in the context of a life-cycle perspective

### **6.1.3 Compliance obligations**

We operate and maintain arrangements to identify, review, document and communicate our environmental compliance obligations as set out in our EMS Fulfilment of Environmental Compliance Obligations Procedure.

By means of this procedure we determine, and provide access to, the compliance obligations related to our environmental aspects, and:

- determine how these compliance obligations apply to us
- take these compliance obligations into account when establishing, implementing, maintaining and continually improving our EMS

### **6.1.4 Planning action**

We have implemented our EMS to address our significant environmental aspects, our compliance obligations and the risks and opportunities we identify.

Through planning, measurement and review, in accordance with our EMS, and taking into account both our technological options and our financial, business and operational requirements, we act to ensure continual improvement in our environmental performance.

We operate and maintain arrangements for the periodic review of these plans as set out in our EMS Control of Management Reviews Procedure.

## **6.2 Establishing and achieving Environmental Objectives**

### **6.2.1 Environmental Objectives**

The Senior Management Team will commit to our Environmental Objectives, which are to:

- reduce wastage of plastics
- reduce emissions and releases to the environment through vehicles
- reduce the number of environmental accidents and incidents
- reduce organisation's carbon footprint
- enhance environmental awareness among employees, contractors and customers.

These objectives take into account our significant environmental aspects, associated compliance obligations and those risks and opportunities that we have identified.

The Senior Management Team ensures that our Environmental Objectives are:

- consistent with our Environmental Policy
- measurable
- monitored
- communicated

- updated as appropriate

Progress towards achieving each target, and the targets themselves, are reviewed annually by the Senior Management Team and updated as necessary.

These objectives, and the results of the Senior Management Team's annual review, are communicated to all employees, customers, suppliers, contractors, interested parties and the wider community.

We maintain documented information on each of the Environmental Objectives.

### **6.2.2 Planning actions to achieve our Environmental Objectives**

When planning how to achieve Environmental Objectives, we determine:

- what will be done
- what resources will be required
- who will be responsible
- when it will be completed
- how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable Environmental Objectives.

Wherever practicable, we seek to integrate actions to achieve our Environmental Objectives into our business processes.

The head of each business function periodically, or whenever Environmental Objectives are changed, prepares an Environmental Objectives Realisation Plan for their area of responsibility which is submitted to the Senior Management Team for approval and monitoring.

## **6.3 Change management**

This manual constitutes our overall plan for establishing, maintaining and improving our EMS.

Whenever changes are to be made to processes, or our EMS, those changes are planned, implemented, and then verified for effectiveness as set out in our Control of Management System Documentation Procedure.

The environmental management review and the internal audit processes ensure the continuing integrity of our EMS when significant changes are planned.

## **7 Support**

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### **7.1 Resources**

The Senior Management Team ensures that all necessary human and physical resources are available to:

- implement and maintain our EMS
- continually improve its effectiveness

Resources and resource allocation are assessed and monitored during environmental management reviews.

## 7.2 Competency, and

## 7.3 Awareness, and

## 7.4 Communication

We operate and maintain arrangements to ensure competency, awareness and communication as set out in our Competency Communication and Awareness Procedure.

These arrangements ensure that:

- all staff are competent to undertake their tasks
- all staff are aware of:
  - our management system(s) and their related policies and objectives
  - their roles and responsibilities
  - their contribution to the effectiveness of our management system(s)
  - the benefits of improved personal performance
  - the importance of complying with our management systems, policies and procedures
  - the consequences of any departure from our management systems, policies and procedures
  - emergency preparedness and response requirements
  - any management system changes
  - the results of the Senior Management Team’s annual review of management system(s) compared to their objectives
- training needs are identified
- appropriate training plans are developed and implemented

In addition to our staff, awareness programmes are also provided for contractors, temporary workers and visitors etc. as appropriate.

## 7.5 Documentation & records

### 7.5.1 General

Our EMS documentation includes both documents and records<sup>2</sup>.

The Senior Management Team has determined the extent of documented information:

- required by ISO 14001:2015
- necessary for the effectiveness of the EMS

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<sup>2</sup> While ISO 14001:2015 uses the sole term “documented information” our environment management system uses both “document” and “record” to avoid confusion. For our purposes, a “document” is a written information used to describe how an activity is done and a “record” is documented evidence of the completion of an activity.

Based on the following criteria:

- the size of our business
- the scope, complexity and interaction of our processes, products/services
- the need to demonstrate fulfilment of our compliance obligations
- the competence of our staff

### **7.5.2 Control of documents**

We operate and maintain arrangements for the control of our quality management system documentation as set out in our Control of Management System Documentation Procedure.

By means of this procedure we ensure that staff have access to the latest, approved information, and that the use of obsolete information is restricted.

Once established, all documented procedures are implemented and maintained.

### **7.5.3 Control of records**

We operate and maintain arrangements for the identification, storage, retrieval, protection, retention, and disposition of environmental records as set out in our Control of Management System Records Procedure.

This procedure also defines the methods for controlling records that are created by and/or retained by suppliers.

These controls are applicable to all those records which provide evidence of conformance to our EMS, environmental objectives and compliance obligations.

## **8 Operations**

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### **8.1 Operational planning and control**

The Senior Management Team ensures that the processes needed to meet our EMS requirements, to address risks and opportunities, and to establish and achieve our Environmental Objectives are properly planned and controlled.

To achieve this objective we operate and maintain arrangements for operational planning and control as set out in our EMS Control of Operations Procedure.

#### **8.1.1 Emergency preparedness and response**

We operate and maintain arrangements for environmental emergency preparedness as set out in our EMS Environmental Emergency Preparedness and Response Procedure.

Our preparations include:

- planning actions to prevent or mitigate adverse environmental impacts from emergency situations
- readiness to respond to actual emergency situations
- taking action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact
- periodically, where practicable, testing the planned response actions

- periodically reviewing and updating the processes and planned response actions, in particular after the occurrence of emergency situations or tests
- providing relevant information and training related to emergency preparedness and response, as appropriate, to all those working under our control and relevant interested parties.

## 9 Performance Evaluation

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### 9.1 Monitoring, measurement, analysis and evaluation

#### 9.1.1 General

To evaluate the performance of our EMS, we determine and record:

- what needs to be monitored and measured
- the methods of monitoring, measurement, analysis and evaluation needed to ensure valid results
- the criteria against which we evaluate our environmental performance and various indicators
- when such monitoring and measurement should be undertaken
- when the results from monitoring and measurement are to be analysed and evaluated

These activities are used to evaluate:

- the performance and effectiveness of our EMS
- the effectiveness of actions taken to address risks and opportunities
- the effectiveness of planning
- the performance of external providers
- other improvements to the management system

We operate and maintain arrangements for this analysis and evaluation as set out in our EMS Monitoring, Measuring, Analysis and Evaluation Procedure.

We operate and maintain arrangements to ensure that all calibrated or verified monitoring and measuring equipment and validated software is appropriately used and maintained as set out in our Control of Calibration, Verification and Software Validation Procedure.

#### 9.1.2 Evaluation of compliance

We operate and maintain arrangements for evaluation of compliance as set out in our EMS Fulfilment of Environmental Compliance Obligations Procedure.

By means of this procedure we:

- determine the frequency of compliance evaluation
- evaluate compliance and take action as necessary
- maintain knowledge and understanding of our compliance status

### **9.1.3 Environmental Monitoring Plan**

We have identified the key characteristics of processes and activities that should be measured and included them in our Environmental Monitoring Plan which clearly identifies what will be measured, where and when it should be measured, and what methods should be used.

The Group SHEQ Manager periodically analyses the results of measurement and monitoring and:

- communicates relevant environmental performance information both internally to the Senior Management Team and all appropriate managers and supervisors
- reports results to the environmental management review meeting, which evaluates and uses these results, to identify both successes and areas requiring correction or improvement

## **9.2 Internal audit**

We operate and maintain arrangements for internal auditing at planned intervals as set out in our Control of Internal Auditing Procedure.

By means of these audits, we provide information to management and determine whether our EMS:

- conforms to our own requirements
- conforms to the requirements of ISO 14001
- is effectively implemented and maintained
- is effective in achieving our management system's policies and objectives

## **9.3 Management review**

We operate and maintain arrangements for reviewing the suitability, adequacy and effectiveness of our EMS, at planned intervals, as set out in our EMS Control of Management Reviews Procedure.

These reviews include assessing the continuing suitability, adequacy and effectiveness of our EMS, opportunities for improvement, and the need for changes.

# **10 Improvement**

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## **10.1 General**

We use our EMS, and other inputs, to continuously improve our environmental outcomes. The improvement opportunities we seek include:

- addressing evolving and future needs and expectations
- correcting, preventing and reducing undesired effects
- improving the performance and effectiveness of our EMS

## **10.2 Non-conformity and corrective action**

We operate and maintain arrangements for taking corrective action to eliminate and further prevent the cause of any non-conformity, and preventive action so as to eliminate the causes of potential similar non-conformities, as set out in our Corrective and Preventative Action Reporting (CPAR) Procedure.

## **10.3 Continual improvement**

We seek to continually improve the suitability, adequacy and effectiveness of this EMS.

We use the results of analysis and evaluation, and the outputs from environmental management reviews, to identify needs and opportunities for such improvement.

The overall effectiveness of our programme of continual improvement, including both corrective actions and our wider progress in achieving corporate level improvement objectives, is monitored and assessed through our environmental management review process.

## 11 Appendix 1 - Organisation Chart

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