




# Sterling Chemical Malta Ltd

## PROCEDURE: COMMUNICATION

### REVISION HISTORY

Revision Date	Revision Number	Sections affected	Change description
22.01.2014	00		First issue

Procedure Number: <b>MPA_4.4.3-A</b>	Edited by: <b>RDOC</b>	Revision by: <b>RSGA</b>	Approved by: <b>Top Management</b>
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## 1. PURPOSE

This procedure defines the process for:

- a) Internal environmental communication/awareness within Sterling Chemical Malta Ltd and
- b) External environmental communication between Sterling Chemical Malta Ltd and external interested parties, such as regulatory authorities and the public/local community.

## 2. SCOPE

Internal communication should identify, explain, and communicate environmental legal requirements and voluntary commitments to all employees, on-site service providers, and contractors whose work could affect your ability to meet those requirements and commitments. External communication should provide other stakeholders with information on your environmental programs and accomplishments and provide a means for external parties to comment or provide input to the company.

## 3. DEFINITIONS

*External Communications:* written or electronic correspondence, telephone conversations, and discussions or meetings with anyone external to the facility

*EMS:* Environmental Management System

*HSE Committee:* Health, Safety and Environmental Committee

*RSGA:* Environmental Management Representative

*RDOC:* Responsible of Documentations and Communications


*Stakeholders:* an accountant, group, organization, member or system who affects or can be affected by an organization's actions

## 4. REFERENCE DOCUMENTS

MDA_4.2	Environmental policy
MPA_4.3.2	Legal Requirements and other requirements
MPA_4.4.2	Training
MPA_4.6	Management Review

## 5. RESPONSIBILITY

*RDOC:* Responsible of Documentation and Communications of the Environmental Management System

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## 6. PROCEDURE

### 6.1 Identifying and Understanding Stakeholders

The facility will have a wide array of internal and external groups that may be interested in, and helpful partners to, that facility. These groups will not be homogenous. Each will have its own priorities and perspectives and each will have something different to contribute in support of your EMS. Part of communication is identifying and understanding these parties over time. Two types of stakeholders are discussed in this procedure: internal and external.

Internal stakeholders include:

- Employees;
- Shareholders;
- Customers;
- Suppliers;
- Investors and insurers; and
- Trading partners.


External stakeholders include:

- Neighbors;
- Community organizations
- Non-governmental organizations (NGOs);
- Government organizations;
- The media; and
- The general public..

### 6.2 Stakeholders role

Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees “take ownership” of the EMS and the changes it may bring

- Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees “take ownership” of the EMS and the changes it may bring;
- Different stakeholders bring useful perspectives to environmental issues, often identifying issues that may otherwise have been overlooked;
- Participation by all types of stakeholders can add credibility, transparency, and value to Sterling’s EMS;

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- Involving external stakeholders can help them understand Sterling facility's operating constraints;
- Being an environmental leader may lead to customer recognition and loyalty, and involving customers in Sterling's EMS can help them recognize your leadership; and
- Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that Sterling's facility can help Sterling's customers meet their environmental management needs. Forming partnerships with suppliers can help Sterling's facility obtain important information and may help HSE Committee meet Sterling's EMS goals


### 6.3 Method of communications

Consider various methods of regular communication with stakeholders about facility and environmental efforts and goals. These methods can build on existing methods, such as:

- Discussing the EMS at facility meetings;
- Updating the facility Web site to communicate Sterling's environmental policy and other important elements of Sterling's EMS and to solicit comments and suggestions;
- Including EMS information in Sterling's annual report;
- Scheduling tours of Sterling Chemical Malta facility;
- Producing a fact sheet about Sterling facility's activities, the EMS program, and why and how Sterling's facility would like to include stakeholders;
- Establishing a phone line to answer questions, record concerns, etc.;

and

- Holding public meetings when Sterling feel it is appropriate.
  - ✓ Ensure that stakeholder dialogue is a two-way process. The stakeholders will want to know that their comments and concerns are being heard and taken into account.
  - ✓ Convey that your facility is genuinely interested in their input and explain how you will include them.
  - ✓ Consider assigning responsibility to a lead person for external communications (communications liaison). There also should be two back- up employees that could fill- in when the lead person is absent. The facility should choose people for these roles who have experience in communicating effectively with the news media and the community, and they should be properly trained for this role.
  - ✓ Track communication. Develop a procedure for documenting and responding to stakeholder communication. This will help you track input from stakeholders and

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## 6.4 Internal communications

Internal environmental communications shall be implemented to ensure those personnel at each relevant level and function are aware of the following:

- I. The Environmental Management System;
- II. The importance of conformance with the environmental policy, procedures, and system;
- III. The potential consequences of system non-conformances;
- IV. Individual roles and responsibilities in achieving conformance with procedures, including emergency preparedness and response; and
- V. The significant environmental aspects associated with work activities and the environmental benefits of improved personal performance.

Internal environmental communications may be accomplished by the use of:


- I. Notice boards;
- II. Awareness training of facility personnel, as appropriate in line with job function;
- III. Environmental training of relevant job functions, as appropriate;
- IV. Newsletters;
- V. Electronic notes;
- VI. Team meetings and meeting minutes;
- VII. Management reviews and meeting minutes; and/or
- VIII. Corrective Action Requests.

Communication of environmental issues from employees to top management shall be handled by the HSE committee member representing the affected area, in coordination with the Environmental Management Representative (RSGA) and RDOC. These communications shall be documented.

Communication of changes to legal and other requirements to employees shall be handled by the Area or Department Manager or designee. These communications shall be documented.

## 6.5 External Communications

- External communications concerning the environmental aspects of the facility should be directed to the lead community liaison person (the plant manager, plant supervisor, production supervisor, health, safety and security manager and the RSGA are some likely choices for the lead community liaison role) or his designee (RDOC).
- The lead community liaison person or his designee is responsible for responding to inquiries from interested parties and regulatory agencies.
- The lead community liaison person or his designee is responsible for sending current copies of the environmental policy to interested parties. These requests will be documented on the External Stakeholder Communications Record (MMA\_4.4.3-A);
- The lead community liaison person or his designee is responsible for responding to media communications;
- When community concerns relate to an environmental emergency, the Procedure for Emergency Training and reaction (MP\_4.4.7) shall be implemented.

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- The RDOC in consultation with the lead community liaison person is responsible for determining the need for and preparation of any notification to regulatory agencies on an as needed basis.

## 7. RECORDS

Records shall be retained consistent with the Procedure for Environmental Records

## 8. APPENDIX

[Appendix 1 External Stakeholder Communications Record \(MMA\\_4.4.3-A\)](#)

 Sterling Chemical Malta Ltd	FORM - DRAFT	Form Number: MMA_4.4.3
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Date  
Time

Contact Name

\_\_\_\_\_  
\_\_\_\_\_

Type of Contact  
Meeting

Person Completing Form

\_\_\_\_\_

e-mail  
Telephone  
Mobile  
Fax  
Web site

#### Environmental issue/concern

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#### Actions to be taken

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#### Type of Follow-up Required:

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