

ADM EP 01 Legal Requirements and Compliance Procedure

Change History

Revision No.	Description of Change	Date
0	First issue.	23.05.2012
1	Included reference to evaluation of compliance by competent Authorities.	24.10.2012
2	Included reference to evaluation of compliance by operators and changes to method of internal evaluation of compliance by Compliance Unit.	31.10.2012
3	Included reference to review of internal procedures and any related controlled documents.	19.11.2012
4	Change in CEO appointment.	16.10.2013
5	Change in CEO appointment.	26.06.2014
6	Change in signatories. Transferred responsibilities of COCC to the Department Manager – Operations Division.	04.09.2014
7	Updated signatories. Updated Department Manager – Operations Division Responsibilities (Section 4). Updated reference to MJCL website for updating environmental register (Section 5.1). Removed details on Competent Authorities inspection reports since this will be handled in ADM EP03 (Section 5.2).	22.04.2015
8	Change in logo.	30.07.2015
9	Included reference to Tal-Kus Transfer Station. Transferred responsibilities of Management Representative to DMOD. Removed reference to the Audit Plan.	31.07.2017

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1 PURPOSE

The purpose of this procedure is to establish a consistent method for:

- Identifying and having access to the applicable legal (and other) requirements to which Wasteserv subscribes to its environmental aspects.
- Determining how the requirements apply to the Wasteserv Facilities' environmental aspects.
- Periodically evaluating compliance with requirements.

2 SCOPE

This procedure applies to the following Wasteserv Facilities:

- Thermal Treatment Facility (TTF)
- Sant' Antnin Waste Treatment Plant (SAWTP)
- Maghtab Environmental Complex (MEC)
- Civic Amenity Sites (CA sites)
- Tal-Kus Transfer Station (KTS)

3 REFERENCE DOCUMENTS

- WS 006 Environmental Legislation Register
- WS 024 Corrective Preventive Action Request form
- ADM QP05 Corrective and Preventive Action Procedure

4 RESPONSIBILITIES

The **Department Manager – Operations Division (DMOD)** is responsible to:

- Research and record the applicable legal (and other) requirements in the Environmental Legislation Register (WS 006).
- Inform the OBU Head and Chief Officer Strategy Implementation (COSI) of any applicable legal requirements and any non-conformities.
- Conduct an evaluation of compliance against the applicable site permit (whether this is an IPPC or an Environmental Permit).

The **OBU Head** is responsible to:

- Review the requirements applicable to the Facility.
- Communicate to all employees the requirements applicable to the Facility.
- Implement the necessary action to adhere to the legal requirements applicable.
- Communicate with COO and DMOD on how the legal obligations are being implemented at the Facility.

Assigned Wasteserv personnel are responsible to conduct monitoring (non/continuous) of various parameters as requested by the sites' permit (IPPC / Environmental Permit) to ensure conformity to the permit and legal requirements.

All employees must adhere to the applicable environmental legal and other requirements.

5 METHOD

5.1 Identifying Applicable Legal and Other Requirements

Every quarter, the DMOD checks the Ministry for Justice, Culture and Local Government eServices website and reviews any new or amended legislation.

If a new legislation or an amendment to legislation (that is possibly applicable to the Facilities' operations) is noted, the legislation in question is downloaded and reviewed.

The DMOD updates the Environmental Legislation Register (WS 006) and reports to the OBU Head (which is typically the Facility Manager) and COSI in writing:

- the legal requirements applicable
- the action needed
- the plan for implementation (to be agreed with the respective OBU Head)

The OBU Head shall review the new / amended legal requirements and shall determine whether a revision of the internal procedures and any related controlled documents is necessary.

5.2 Evaluation of Compliance

Evaluation of compliance is carried out on 3 different levels:

1. Operations Level – whereby the Heads of OBU monitor their operations continuously to ensure that the Facilities are adhering to the sites' permit (IPPC / EP).
2. Head Office Level – Evaluation of compliance against the Facilities' permit (IPPC / EP) is performed by the DMOD on through compliance checks spread throughout the year. The result of these evaluations are recorded and reported to the Head of OBU, COO and Top Management as applicable.
3. Authorities Level – Evaluation of Compliance to IPPC and other permits applicable to the Facilities is also carried out by the competent Authorities. ADM EP03 documents the method by which inspection reports by authorities are handled by Wasteserv.

If the evaluation of compliance indicates that the organisation is breaching the legal requirements, the non-conformance shall be reported in the Corrective Preventive Action Request form (WS 024) and corrective action is implemented to rectify the non-conformance.

6 ENVIRONMENTAL RECORDS

- The updated Environmental Legislation Register (WS 006) is saved on the server and managed by the DMOD.
- Corrective Preventive Action Request (CPAR) forms raised during compliance inspections by DMOD or the competent Authorities are retained in folder on Company server. The other CPAR forms raised (typically raised internally) are retained in the DMOD's Office as stipulated in **ADM QP 05**.