



CSM Office Furniture Solutions

Environmental Policy

Our Commitment

CSM and its key stakeholders are committed to the sustainable management and conservation of the environment.

CSM's overriding goal is to "touch the ground lightly"⁽¹⁾ minimising its own ecological footprint by challenging environmental best practice and prevention of adverse environmental effects

The commitment is to be the environmental leader in its industry group, be a role model for others to follow by actively pursuing environmental best practice not just within the controlled conditions of its manufacturing and office facilities but through the entire supply chain. CSM views environmental issues as being a global concern and not acceptable to move the problem overseas "out-of-site".

CSM's ethos is to :-

- Identify, review and manage our environmental impacts, potential risks and opportunities for improvement;
- Develop and implement environmental management programs to continually improve performance and realise opportunities for environmentally positive contribution;
- Minimise waste-to-landfill, greenhouse gas emissions and other pollution, further reduce our consumption of power, water and natural resources and employ environmental considerations in purchasing decisions;
- Seek ecologically sustainable solutions to all manufacturing inputs, by recycling stormwater, sustainable power generation, reuse of packaging and minimising and recycling of scrap;
- Incorporate environmental management considerations into our core business plans and management practices, including the operation of plant and machinery;
- Regularly monitor and report on our environmental performance;
- Actively promote and encourage the adoption of ecologically sustainable work practices and operations within our organisation, with our clients and suppliers;
- As a minimum, comply with applicable legal and other requirements including relevant Government and Department policies;
- Communicate this policy and other environmental management commitments to all staff and, make this policy available to the public on the Department's website;
- Acknowledge shared responsibility of environmental impacts of products manufactured and supplied by CSM throughout the products lifecycle.



CSM's Product Stewardship framework seeks to:

- Improving the efficiency of resource use in products;
- Increasing resource recovery;
- Minimising the generation of waste (including hazardous substances);
- Improving the management of post-consumer waste;
- Reducing the risks to human health from poor management of products; and
- Incorporating product management costs into consumer price signals.

CSM provides and maintains:

- A product end-of-life take-back scheme; and
- A product labelling requirement.

⁽¹⁾Whilst much clichéd and misused, Architect Glenn Murcutt clichéd phrase aptly describes how CSM is to integrate with the environment.



CSM Office Furniture Solutions
Environmental Management System Guide

Date: 24 March 2008



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1. Introduction

Environmental Management Systems (EMS) are designed to enable organisations to address both environmental concerns and economic imperatives by creating a system of processes and procedures that examine their performance against their environmental goals. The International Standard emphasises continual improvement in the performance of the system and, through this, improvements in the organisation's environmental performance are expected to result. Further, since a systematised approach to environmental performance fosters a more efficient use of resources by the organisation, the prospect of benefits to the organisation's bottom line should be a powerful incentive for implementing an EMS.

CSM Office Furniture Solutions (CSM) believes that sound environmental management is an important component of the organisation's overall management responsibility. CSM seeks to demonstrate its environmental performance through the implementation of an Environmental Management System (EMS) which addresses all of CSM's operations. The cornerstones of the EMS are:

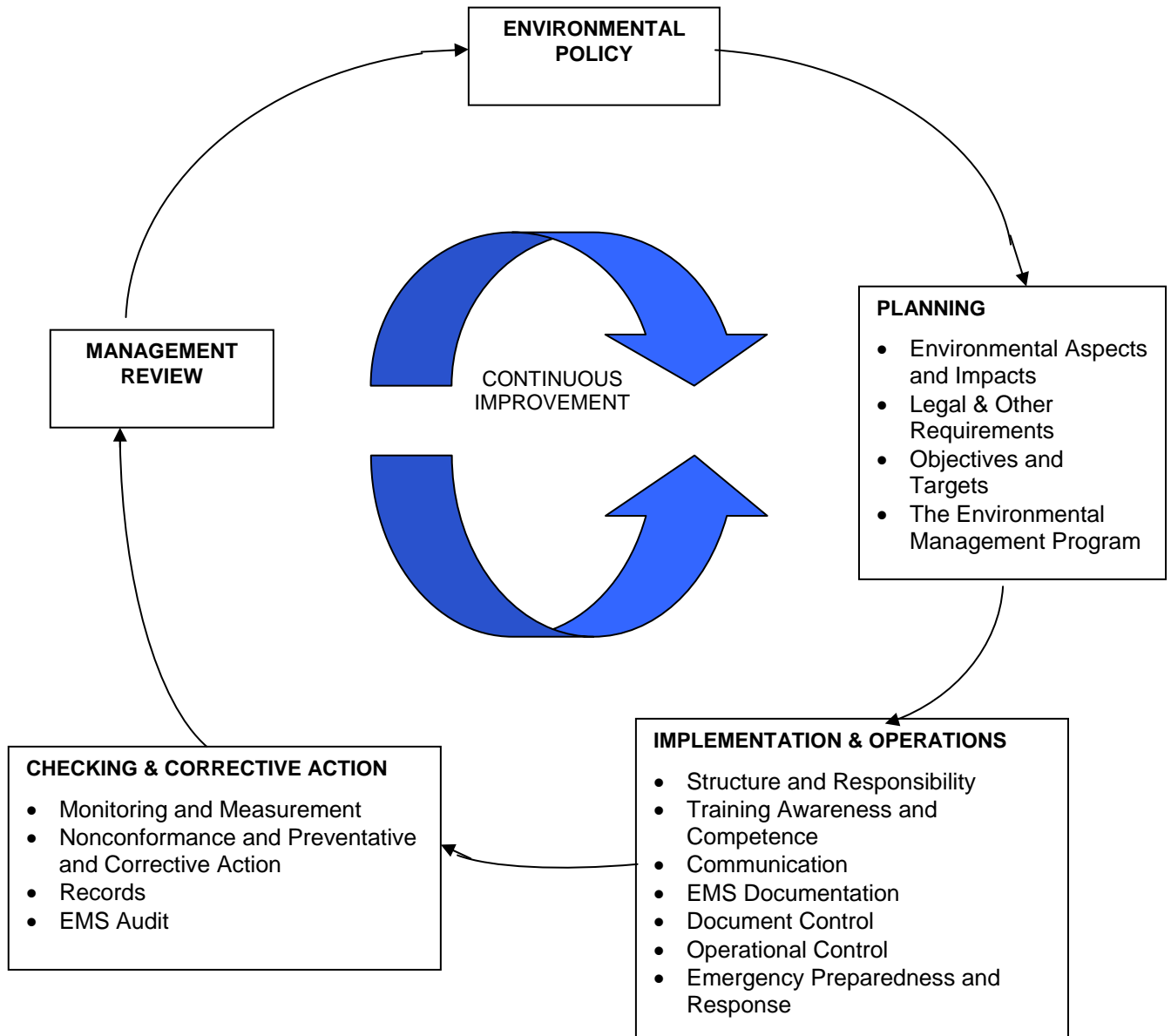
- Development of an Environmental Policy;
- Development and implementation of Environmental Objectives and Targets;
- The ongoing monitoring and reviewing of environmental performance; and
- Continuous improvement of the EMS to further enhance CSM's environmental performance.

CSM has developed an Environmental Management System (EMS) and has established an EMS Management Team as part of its commitment to minimise the environmental impacts of its operations using the EMS. The EMS Management Team comprises administrative officers from each area and an Environmental Management System (EMS) Coordinator. A commitment from management has been required in order to establish CSM's EMS. The Management of CSM have happily accepted this role.

CSM's EMS is based on the international standard ISO 14001:1996 *Environmental management systems - specifications with guidance for use*. Reference was also made to ISO 14004:1996 *Environmental management systems General guidelines on principles, systems and supporting techniques*. These Standards should also be used for ongoing development of the EMS.

The Environmental Policy, Procedures Manual and the Procedures Registers are the key EMS documents. They are found within CSM's EMS file.

2. Overview of EMS





3. The Functional Units of EMS Explained

EMS Principle	Unit of Principle	Description	
Planning	Environmental Aspects	An element of an organisation's activities, products or services that can interact with the environment.	
	Legal and Other Requirements	Identification of the most pertinent legislation and other requirements.	
	Objectives and Targets	Outlines objectives and targets relating to the most significant environmental impacts identified.	
	The Environmental Management Programme	Assigns responsibility for meeting the environmental targets, specifies a framework for their achievement, and provides a timescale specifying completion dates.	
Implementation and Operation	Structure and Responsibility	Sets out CSM's structure and staff responsibilities for implementation of the EMS.	
	Training, Awareness and Competence	Establishment and implementation of a training and awareness programme.	
	Communication	Communication of results from EMS monitoring, audits and management reviews to all relevant personnel who are responsible for environmental performance.	
	Environmental Management System Documentation	List of EMS documentation.	
	Document Control	Procedures to control all EMS documentation such as the Procedures Manual and Registers.	
	Operational Control	Minimises adverse environmental impacts through the development and maintenance of documented standard operating procedures to ensure that the objectives and targets are achieved.	
	Emergency Preparedness and Response	Procedures and action plans in case of emergency situations and to reduce the environmental impact of emergencies.	
	Checking and Corrective Action	Monitoring and Measurement	Action to review the effectiveness of EMS by internal reviews and by a nominated external auditor. Actions to be undertaken in the event of a nonconformance with the EMS. Concerns procedures necessary to maintain records appropriately. Programmes and procedures required for the successful auditing of the EMS.
		Nonconformance and Corrective and Preventive Action Records Environmental Management System Audit	
Management Review		Review of the EMS at least once a year.	



4. Planning

4.1 Environmental Aspects and Impacts

Requirements of the Standards

AS/NZS 14001 requires an organisation to 'establish and maintain a procedure(s) to identify the environmental impacts of its activities, products or services that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment' (AS/NZS ISO 14001:1996, 4.3.1).

To meet the requirements of the Standards, CSM has identified those environmental aspects of its activities, products and services that it can influence. The identified environmental impacts of each identified aspect are outlined in the Register of Environmental Aspects and Impacts (EF005).

A risk assessment model is used to rank the identified impacts in terms of significance. The models assessment criteria are based on a consideration of business and environmental factors. The model assesses the environmental impacts according to the:

- probability of occurrence; and,
- severity of impact.

This risk assessment allows CSM to prioritise the relative risks of its current activities and determine the significance of each environmental impact for each of the environmental aspects identified.

Procedures have been established to identify and evaluate the environmental aspects and impacts of CSM's operations. These are listed in the Procedures Manual - Environmental Aspects Procedure (EF004). Reassessment of the environmental aspects and impacts is required by the CSM's EMS Coordinator annually or when there are changes to the Company's operations to ensure the information is kept current.

4.2 Legal and Other Requirements

Requirements of the Standards

ISO 14001 requires an organisation to 'establish and maintain a procedure to identify and have access to legal and other requirements...that are applicable to the environmental aspects of its activities, products or services' (AS/NZS ISO 14001:1996, 4.3.2).

CSM understands the importance of meeting, and where practicable, exceeding, its regulatory obligations. CSM has met the above requirements by developing a Legislation and Other Requirements Register (EF006) in accordance with a Legislative and Other Requirements Register Procedure (EF004). This Procedure, detailing the mechanisms by which the Register has been established, can be reviewed and updated as required.



As a key component of the EMS the Legislation and Other Requirements Register (EF006) provides a summary of applicable Commonwealth and State Laws, Codes of Practice, Commonwealth Government Policies, Initiatives, Licensing and Permits. Important Commonwealth Policy initiatives include the Greenhouse Challenge and the Packaging Covenant.

4.3 Objectives and Targets

Requirements of the Standard

ISO 14001 requires an organisation to 'establish and maintain documented environmental objectives and targets, at each relevant function and level within the organisation' (AS/NZS ISO 14001: 1996 4.3.3).

In accordance with the Standard CSM has established objectives and targets (refer to the Register of Objectives and Targets (EF007)) by considering legal and other requirements, environmental goals arising from its environmental policy and by identifying significant environmental impacts. As required by the Standard, technological options, views of interested parties and financial, operational and business requirements were also considered.

CSM's Environmental Objectives and Targets relate to the following aspects, determined to have significant environmental impacts:

- Energy Consumption (Electricity and Gas);
- Generation of Waste; and
- Consumption of Natural Resources.

The EMS Coordinator shall coordinate an annual review of the objectives and targets. A review is also required to assess the impacts of changes to CSM's operations, the results of management reviews as well as environmental audit findings and recommendations. The revision of objectives and targets shall form the basis for continual improvement in CSM's environmental performance.

Procedures relating to the establishment, progress and review of objectives and targets can be found in the Procedures Manual - Environmental Objectives and Targets Procedure (EF004).

4.4 The Environmental Management Programme

Requirements of the Standard

ISO 14001 requires that an organisation establish and maintain (an) Environmental Management Programme(s) for achieving its objectives and targets. The programme shall include:

- *designation of responsibility for achieving objectives and targets at each relevant function and level of organisation; and,*
- *the means and time-frame by which they are to be achieved.*

Where a project relates to new developments and new or modified activities, products or services, 'programmes shall be amended where relevant to ensure that environmental management applies to such projects' (AS/NZS ISO 14001:1996 4.3.4).



To meet these requirements, CSM has developed an Environmental Management Programme (EF008) to address those aspects assessed as having environmental impacts of high significance. The Environmental Management Programme Procedure (EF004) assigns tasks and responsibility for meeting environmental targets and specifies a framework for their achievement.

The Environmental Management Programme will be revised by the EMS Coordinator annually and upon significant changes to CSM's portfolio and operations.

5. Implementation and Operation

Effective implementation and operation of CSM's EMS requires the Company to develop capabilities and support mechanisms necessary to achieve the EMS objectives and targets. CSM shall achieve this through the development of the following EMS areas:

- Structure and responsibility;
- Training, awareness and competence;
- Communication;
- EMS documentation;
- Document control;
- Operational control; and
- Emergency response and preparedness.

5.1 Structure and Responsibility

Requirements of the Standard

ISO 14001 requires roles, responsibilities and authorities to be defined, documented and communicated in order to facilitate effective environmental management. Senior management shall provide human, technological and financial resources and appoint a management representative(s) who shall:

- *ensure the environmental management system requirements are established, implemented and maintained in accordance with the International Standard;*
- *report on the performance of the environmental management system to top management for review and as a basis for improvement. (AS/NZS ISO 14001:1996, 4.4.1)*

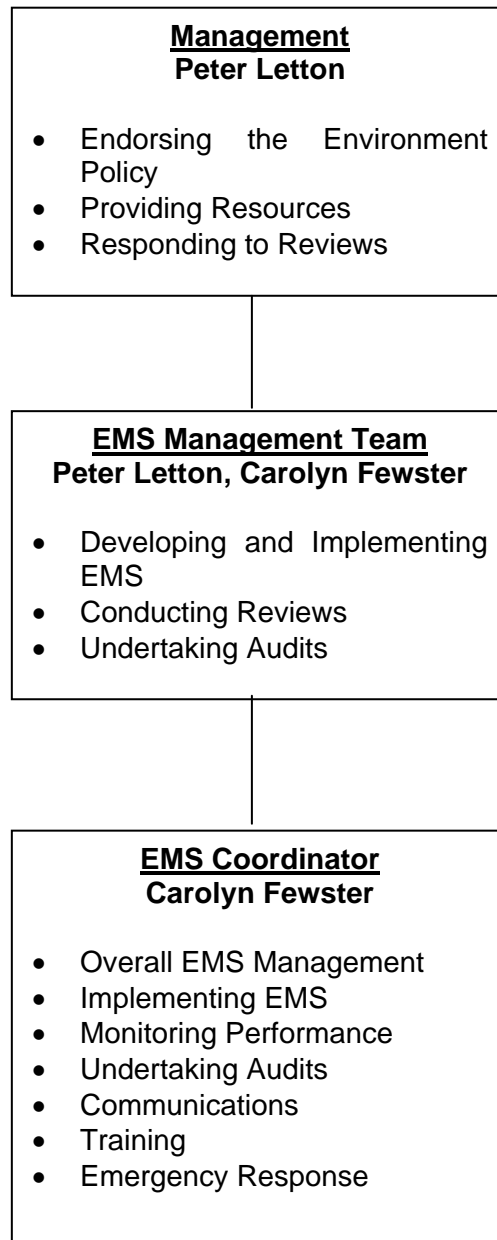
To meet the requirements of the standard, CSM has appointed an EMS Coordinator to coordinate the development and implementation of the environmental management system and the nomination of EMS officers. These appointed personnel represent the EMS Management Team who work together to implement and maintain the EMS.

The EMS Coordinator has the authority to ensure compliance, identify and implement solutions, and act upon incidents. The EMS Coordinator is also responsible for assisting and informing personnel and contractors of their roles and responsibilities with respect to CSM's EMS, and shall coordinate audits and management reviews.



The following organisational chart outlines the key responsibilities attributed to CSM's personnel involved in the development and implementation of the Environmental Management System. More extensive role and responsibility descriptions can be found in the Procedures Manual.

Figure 1. CSM Office Furniture Solutions Environmental Management System Major Responsibilities Chart





5.2 Training, Awareness and Competence

Requirements of the Standard

ISO 14001 requires that an organisation establish and maintain a programme to identify and address environmental training and awareness for all its stakeholders. CSM's stakeholders include employees, contractors, suppliers and customers. It requires that personnel whose work may create a significant impact on the environment receive appropriate training (AS/NZS ISO 14001:1996, 4.4.2).

In accordance with the International Standard, an Environmental Training, Awareness and Competence Procedure (EF004) has been developed to ensure that:

- The importance of compliance with the environmental policy, EMS procedures and requirements is communicated to stakeholders;
- Stakeholders are aware of the significant environmental impacts (actual and potential) of their work activities and of the environmental benefits of improved personal performance;
- Stakeholders are aware of their individual roles and responsibilities in conforming with legal, environmental policy and emergency preparedness and response requirements, and aware of the potential consequences of departure from specified operating procedures; and
- Stakeholders are adequately trained to successfully perform their designated roles and responsibilities.

CSM's most significant environmental impacts relate to manufacturing and administrative activities. An Environmental Training and Awareness Programme and Register (EF009) has been developed to equip stakeholders with a level of knowledge required to minimise adverse environmental impacts related to the Company's manufacturing and administrative activities, and to gain support for CSM's EMS.

Documentation for the Environmental Training and Awareness Programme and Register shall be maintained by the EMS Coordinator. This information shall be recorded in accordance with the Environmental Records Procedure (EF004).

5.3 Communication

Requirements of the Standard

ISO 14001 requires that an organisation establish and maintain procedures for internal communication between various levels and functions of the organisation regarding its environmental aspects, environmental management system.

The Standard also requires an organisation to consider processes for external communication on its significant environmental aspects, together with a mechanism to record these communications (AS/NZS ISO 14001:1996, 4.4.3).



CSM recognises that communicating its environmental objectives, targets and performance to all stakeholders is an essential component of the EMS. It provides for a greater understanding of CSM's environmental impacts and an acceptance of the organisation's effort to improve its environmental performance. CSM encourages the use of electronic communication to reaffirm its commitment to the protection of the environment through avoiding excess use of paper. Through effective internal communication, particularly results of EMS monitoring, audits and management reviews, employees will be well informed and thereby generate greater ownership of the environmental process. This will result in a higher level of motivation to the continuing environmental improvement of CSM.

In accordance with the requirements of the standard CSM has established an Environmental Communications Procedure (EF004). The EMS Coordinator is responsible for documenting and maintaining all communication records.

CSM shall encourage two-way communications and information for both internal and external stakeholders.

5.4 Environmental Management System Documentation

Requirements of the Standard

ISO 14001 requires that an organisation shall establish and maintain information, in paper or electronic form, to:

- describe the core elements of the EMS and their interaction;
- provide direction to related documentation (AS/NZS ISO 14001:1996 4.4.4).

CSM satisfies these requirements by maintaining its EMS in read-only electronic form located on WIKI.

The core elements of this environmental management system are:

- **The Environmental Policy** demonstrating CSM's commitment to and providing direction for continual improvement in environmental performance.
- **The Procedures Manual** consisting of general procedures to enable implementation, accreditation and reviewing of the EMS to ultimately achieve continued improvement in environmental performance. It refers to other documents that register and record the processes and outcomes of these procedures.
- **The Procedures Registers** are the working documents of the EMS. Typically, performance of the procedures requires the recording of information within these registers.

All EMS documents contained within and related to the above core elements will be assigned a unique document identification number (EF) that will enable interested parties to locate referenced documents. Documentation related to, but not contained within the EMS, shall be sufficiently referenced to be accessible.



5.5 Document Control

Requirements of the Standard

In accordance with ISO 14001, CSM has established an Environmental Document Control Procedure to control all EMS documentation such as manuals, forms, records and registers. The EMS Coordinator is responsible for the original copy of the EMS to ensure that its documents are controlled. The standard states that this documentation will be kept legible, dated, identifiable and retained for a specified period. The Environmental Document Control Procedure is required to include provisions for the creation and modification of various types of document (AS/NZS ISO 14001:1996, 4.4.5).

A Document Control File and Register (EF011), and, an Obsolete Environmental Records File and Register (EF012) have been established by CSM to ensure that in accordance with the standard:

- All relevant environmental documents can be easily located within CSM's office;
- Periodic reviews of documents are revised as necessary under the authorisation of the EMS Coordinator ;
- Up to date versions of relevant documents are available at locations where operations essential to the effective functioning of the environmental management system are performed;
- Obsolete documents are immediately removed to prevent their inadvertent use; and
- Obsolete documents retained for legal or other purposes are held within the Obsolete Environmental Documents File and are suitably identified in the Obsolete Environmental Documents Register.

The EMS Coordinator is responsible for implementing the Environmental Document Control Procedure, and maintaining and updating all EMS manuals and associated documents.

5.6 Operational Control

Requirements of the Standard

ISO 14001 requires that when actual or potential significant impacts have been identified the activities associated with these impacts are identified and control measures are implemented. Control and planning measures must include:

- *documented procedures to prevent deviations from the system;*
- *the establishment of operational criteria within the procedures;*
- *identifying procedures that have significant environmental aspects;*
- *establish procedures to ensure suppliers and subcontractors are aware of the requirements of the EMS. (AS/NZS ISO 14001:1996, 4.4.6)*

CSM has met these requirements by developing Standard Operating Procedures (SOP) (EF014) to reduce the significance of environmental impacts associated with its activities.

Operational Control is required to ensure that activities associated with *potential* significant environmental impacts are conducted under controlled conditions. Functions and activities of



CSM's that have significant environmental impacts have been identified and are recorded in the Register of Environmental Aspects and Impacts (EF005).

Standard Operating Procedures (SOP) (EF014) have been developed for each significant impact of CSM's activities. Each SOP identifies the environmental impact associated with an aspect of CSM's Operations, and suggests management measures that could reduce these impacts.

The EMS Coordinator is responsible for ensuring that all SOP are established in accordance with the Operational Control Procedure (EF004) and are documented in the Operational Control Register (EF0013). The EMS Coordinator is also responsible for communicating the requirements of the SOP to stakeholders.

5.7 Emergency Preparedness and Response

Requirements of the Standard

ISO 14001 requires that an 'organisation shall establish and maintain procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them'.

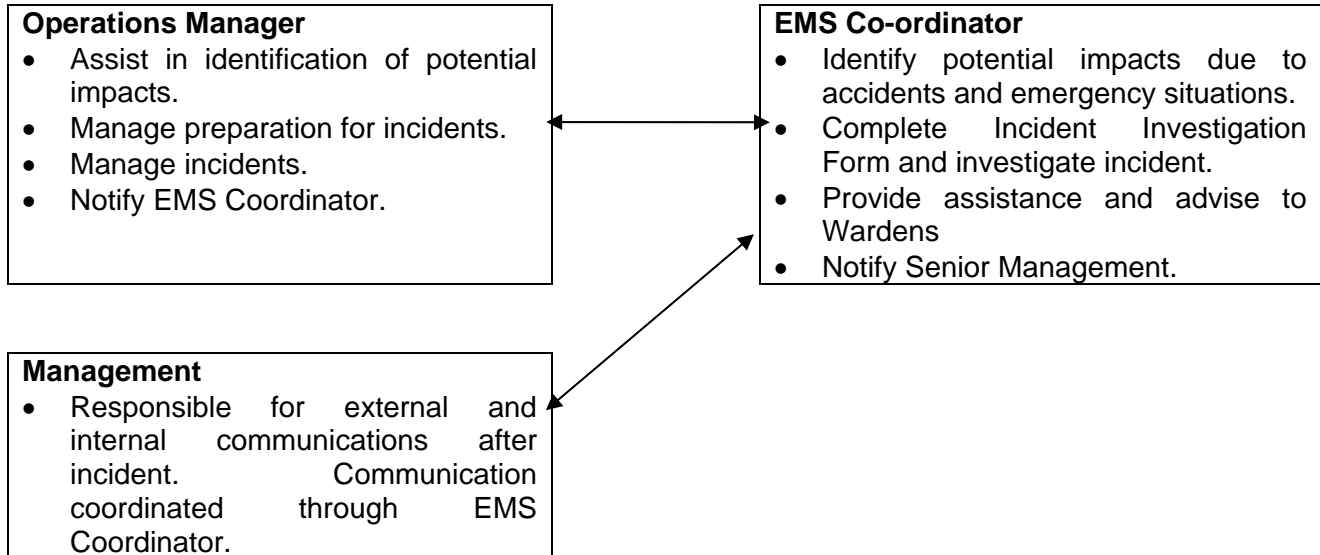
The standard also requires that these procedures shall be reviewed and revised when necessary, in particular after the occurrence of accidents, and that they shall be periodically tested where practicable (AS/NZS ISO 14001:1996, 4.4.7).

To meet these requirements CSM has developed an Environmental Emergency Preparedness and Response Procedure (EF004). This will ensure that potential accidents and emergency situations are adequately managed to prevent or minimise any potential adverse environmental impacts.

It is the responsibility of the EMS Coordinator to identify, with the assistance of the Operations Manager and qualified personnel, the potential environmental impacts of accidents and emergency situations and to ensure that contract services are performed consistently with the EMS.

The Environmental Emergency Preparedness and Response Procedure (EF004) will be annually reviewed and revised to reflect the current operations at CSM's sites. This review process shall be undertaken and coordinated by the EMS Coordinator who may seek external professional advice. The EMS Coordinator shall carry out an investigation and review of the procedure following any emergency incident where a significant environmental impact has, or potentially may have occurred.

Figure 2. Emergency and Incident Management Responsibility Organisational Chart



6. Checking and Corrective Action

In order to facilitate continuous improvement, CSM recognises the importance of ongoing monitoring and implementing any required adjustments. CSM has established and maintains procedures for the measurement and evaluation of its environmental management and performance. Procedures are also in place for the EMS Coordinator to undertake investigations of situations where the EMS was not conformed with, and implement any necessary corrective and preventive actions.

6.1 Monitoring and Measurement

Requirements of the Standard

ISO 14001 requires that an organisation establish and maintain documented procedures to enable ongoing monitoring and measuring for the evaluation of environmental performance of activities that can have a significant environmental impact. These procedures must address the recording of information to track performance, relevant operational controls and conformance with objectives and targets. Records must be kept detailing calibration and maintenance of monitoring equipment used and a documented procedure established for reviewing compliance with relevant environmental legislation and regulations (AS/NZS ISO 14001:1996 4.5.1).

CSM has met the requirements of the standard by developing an Environmental Monitoring and Measurement Procedure (EF004) involving Standard Operating Procedures (Operational Control Register) (EF013), Monitoring and Measurement records (Document Control Register) (EF011), and Environmental Management Plans (Environmental Management Programme) (EF008).



The Standard Operating Procedures listed in the Operational Control Register (EF013) address those activities that have been determined to have significant environmental impacts. They include monitoring and measurement instructions to be followed by all staff and contractors.

When the monitoring and measurement data has been recorded, it is stored in the Document Control File (EF011).

The EMS Coordinator is responsible for assessing the effectiveness of the EMS through periodic reviews of the monitoring data. This will enable the identification of those functions requiring corrective actions and those being successfully implemented. Monitoring and measurement functions will be audited to assist in evaluating the effectiveness of EMS implementation.

6.2 Nonconformance and Preventative and Corrective Action

Requirements of the Standard

ISO 14001 requires that in the case of noncompliance with an element of the EMS:

- *The responsibility and authority for initiating investigation, taking action to mitigate any impacts caused and corrective action shall be defined; and,*
- *Procedures shall be established and maintained for investigating and correcting nonconformance to;*
 - *determine the cause;*
 - *identify and implement corrective action;*
 - *initiate preventative actions;*
 - *apply controls to ensure that preventative actions taken are effective;*
 - *record any changes in written procedure resulting from the corrective action. (AS/NZS ISO 14001:1996, 4.5.2)*

CSM has met these requirements by documenting in its Nonconformance and Corrective and Preventive Action Procedure (EF004) that effective and prompt action must be initiated should an activity or function of CSM fail to comply with:

- the Environmental Policy (EF001);
- EMS Procedures; or
- results in an unforeseen environmental impact.

The EMS Coordinator has been assigned the responsibility and authority to initiate an investigation in the event of a nonconformance.

The Nonconformance and Corrective Action Procedure (EF004) details protocols that enable a nonconformance to be identified. It also details actions to prevent further nonconformances, including the alteration of procedures that lead to nonconformances.

Following implementation, the procedure assesses and verifies the effectiveness of the corrective and/or preventive action.



6.3 Records

Requirements of the Standard

ISO 14001 requires that procedures for the identification, maintenance and disposition of environmental records should be established and maintained. These records, including training records and the results of audits and reviews are required to be legible, identifiable and traceable to the activity, product or service involved. They must be stored and maintained, be readily retrievable and protected against damage, deterioration or loss.

Records shall be maintained, as appropriate to the system and to the organisation, to demonstrate conformance with the requirements of the International Standard (AS/NZS ISO 14001:1996, 4.5.3). CSM has met the requirements of the standard by incorporating the following records in this EMS:

- **The Register of Environmental Aspects and Impacts (SF005)** lists all identified aspects and impacts, highlighting the significant impacts.
- **The Legislation and Other Requirements Register (SF006)** provides a summary of applicable legislation and other requirements to which the CSM must comply.
- **The Register of Environmental Objectives and Targets (SF007)** specify CSM's goals for achieving improvement in environmental performance within a timeframe.
- **The Environmental Management Programme (SF008)** assigns responsibility for meeting the environmental targets, lists the actions required and specifies a framework for their achievement.
- **The Environmental Training and Awareness Programme (SF009)** addresses training and awareness needs to equip CSM stakeholders with the knowledge and skills required to undertake their individual EMS roles and responsibilities.
- **The Communications Register and File (SF010)** contains records of all environmental communication.
- **The Document Control Register and File (SF011)** records all EMS documents and records and their location.
- **The Operational Control Register (SF013)** contains Standard Operating Procedures (SOP) to ensure CSM's objectives and targets are achieved.
- **The Emergency Preparedness and Response File and Register (SF015)** contains Incident Investigation Forms.
- **The Nonconformance and Corrective Action Register (SF016)** is a record of EMS Nonconformances.

All EMS documentation, including environmental records, are given unique identification numbers for ease of reference.

The Environmental Records Procedure has been combined with the Document Control Procedure (SF004) for management of all EMS documents and environmental records.

6.4 Environment Management System Audit

Requirements of the Standard



ISO 14001 requires that programmes and procedures for periodic environmental management system audits be established and maintained in order to:

- determine whether or not the EMS conforms to the requirements of the international standard and the planned arrangements set out in the Guide to the EMS, management programme, procedures and work instructions;
- has been properly implemented and maintained; and,
- provide information on the results of audits to management.

The standard requires that the audit programme also covers the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits. (AS/NZS ISO 14001:1996 4.5.4)

CSM has met the requirements of the standard by developing an Environmental Management System Audit Procedure that addresses:

- The activities and areas to be audited;
- The frequency of audits;
- The responsibility associated with conducting an audit;
- Communication of the audit findings; and
- Auditor competence.

Appropriately trained persons from CSM or external to the Company shall undertake audits of CSM's EMS, appointed by the EMS Coordinator. Auditors shall be required to provide an audit report within 3 weeks of completing an audit. The audit report, which will be presented to senior management, shall detail all activities and functions, and elements of the EMS audited and details of any nonconformances and corrective and/or preventive actions to be undertaken within a specified time frame.

7. Management Review

Requirements of the Standard

ISO 14001 requires that senior management shall at specified intervals review the EMS to determine continued suitability and effectiveness. This review should include results of audits, review of performance against objectives and targets, procedures, incidents, concerns of interested parties, the suitability of the policy, and the suitability of the EMS in view of changing conditions.

The Standard also requires that the management review process shall ensure that necessary information is gathered for management evaluation and that the review is documented (AS/NZS ISO 14001:1996, 4.6).

CSM established a Management Review Procedure (SF004), to be implemented and maintained by the EMS Coordinator, to meet these requirements. The procedure will enable senior management to undertake a complete review of the ongoing suitability and effectiveness of the EMS. The review process, which includes a review of internal and external audits, public and customer comments, and legislative communications will be coordinated by the EMS Management



Team. The EMS Coordinator will ensure the results of the review are documented and distributed to stakeholders.

The EMS Coordinator will initiate and participate in a review of the EMS at least once a year to consider the impact of changes in the Company's operations, legislative requirements and technology.

The EMS Management Team shall initiate corrective action in accordance with the Nonconformance, Corrective and Preventive Action Procedure (SF016) where improvements to the EMS are identified during reviews. The EMS Coordinator shall maintain records demonstrating the implementation of the corrective actions.

Appendix 1 References

AS/NZS ISO 14001:1996, Australian/New Zealand Standard, Environmental management systems-Specifications with guidance for use.

AS/NZS 14004:1996, Australian/New Zealand Standard, Environmental management systems-General guidelines on principles, systems and supporting techniques.

AS ISO 14050-1999 Australian Standard, Environmental management - Vocabulary.

Date 28 March 2009

SURVEILLANCE AUDIT INTERNAL

Client: CSM Office Furniture Solutions Pty Ltd
Site Address: 42 and 49-53 Cawarra Road,
Caringbah NSW 2229

Standard: Environmental Management System

Scope of Certification:

The registration covers the Environmental Management System for the manufacture and sale of sheet metal office furniture and accessories.

INTRODUCTION

An audit of CSM Office Furniture Solutions Pty Ltd was completed on 28 March 2009.

The purpose of this audit report is to summarise the degree of compliance with relevant criteria, as defined on the cover page of this report, based on the evidence obtained during the audit of the organisation.

The Auditor has been assigned to the audit according to industry, standard or technical competencies. Details of such experience and competency are maintained in our records.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

EXECUTIVE OVERVIEW

The audit was conducted against the requirements of the ISO14001:1996 version Standard.

The audit findings indicated that adequate and suitable levels of control and maintenance of the Environmental Management System are in place. No NCRs or Areas of Concern were recorded. Opportunities for Improvement (OFI) were also noted for management information and appropriate action.

In summary, management continues to work diligently to incorporate industry best practice initiatives into the implemented EMS. A new intranet site has been developed and implemented. Appropriate checks and balances are in place which aims to mitigate and better control risks and ensure that environmental objectives and targets are being met in accordance with mandated contractual requirements.

Discussions with the top management team elicited that short term emergency contingency plans have been instigated to guard the organisation's interest against the impact an environmental risk occurring.

Management and staff interviewed during the audit activity clearly demonstrated their ability to embrace the Principles and Practice of Environmental Management.

AUDIT OBJECTIVES

To determine continuing compliance of your CSM's environmental management system with the audit criteria; its effectiveness in achieving continual improvement and system objectives; and to review the management of any changes in the organisation.

REVIEW OF ANY CHANGES

The organisation has introduced a new intranet system which appears to a more intuitive and user friendly system for staff identify and access to documents and records (refer to BOSS – Wiki system). Plans are in place to have all CSM staff trained on the new system – the progress regarding the training of staff on the newly implemented BOSS – Wiki system shall be reviewed during the next scheduled audit activity.

MANAGEMENT COMMITMENT AND ACHIEVEMENT AGAINST OBJECTIVES AND TARGETS

	Total Number of Targets Set	Target Met	Target Not Met
Energy Consumption	8	70%	30%
Emissions to Air	2	100%	0%
Generation of Waste	9	65%	35%
Noise Generation	4	100%	0%
Chemical Use	7	85%	15%
Consumption of Goods	2	50%	50%
Water Use	5	100%	0%

1. Energy Consumption

Energy use intensity has increased over the past 3 years due to a number of factors, such as:

- Increase in work volumes (processing energy)
- Increase in staff numbers (amenities and kitchens)
- Increase in area (air conditioning and lighting)
- Longer working hours (all the above)
- Increase in the number of computers (air conditioning and power)
- Additional machinery (power usage)
- OH&S – removal of electrical power tools and substitute with compressed air tools.
- Upgrading of lighting and air conditioning

The “global” objective ‘To Reduce Energy Consumption’ by 20% required re-definition during the period.

A suitable base comparison against a norm and against a measure of volume would be appropriate. That is, it should work volume/throughput to fall by 20% then clearly energy consumption could fall by 20% without reference to environmental sustainability. Accordingly “Total Hours Worked” may be adopted but various other measures should be assessed as the “denominator”. (Other organisations refer to this as “Energy Use Intensity”).

	1 April 2007 to 31 March 2008 kWh	1 April 2008 to 31 March 2009 MJ	% Change
Electricity	512,961	519,398	1.25 ↑
Gas	2,475,004	2,436,047	1.57↓

Recommendation

Although there were modest movements in Electricity and Gas usage perhaps the target should be revised as 20% is a significant number.

Targets and Results

A. Replace all office lighting with high efficiency T5 globes or equivalent

100% of globes replaced with T5 LED or fluorescent globes where fixtures or electrical fittings do not need to be replaced.

20% of other fixtures replaced

The remainder will be replaced by December 2009 during the scheduled maintenance program.

B. Replace all Factory Lighting with Low Kelvin high efficiency Lighting

Two sections of the factory have been replaced however staff complained of lower light levels. LUX levels need to be considered when replacing lighting.

A complete Site Analysis will be undertaken by Matelec Electrical Services Pty Ltd "the High Efficiency Lighting Company".

C. Purchase only appliances for kitchens and offices with a 4-Star energy rating.

Visual checks of all appliances in kitchens at 49 and 42 Cawarra Road and Sir Joseph Banks Drive, Kurnell, shows all kitchen appliances to be 4 and 5 Star rated.

D. Fit Load/current sensing equipment to machinery supply switchboards F

Factory 2 (machine shop), 42 Cawarra Road has been completed. Factory 1 and 29 Cawarra Road pose some problems due to the age of the switchboard and switchrooms. An electrical contractor will be advising on a cost effective solutions to resolve this issue.

E. Replace seals and air curtains to reduce heat losses on ovens

Completed in December 2008

F. Global Warming

Energy Contract for 49 Cawarra Road is to be renewed and sourced from renewable energy in August 2009.

42 Cawarra Road, Factory 1 and 2 Energy Contract is due for renewal in February 2010 and will be sourced from renewable energy.

2. Emissions To Air

Objective

"To eliminate Air Pollution and discharges of powdercoating particulates under all normal operating conditions".

Targets and Results

A. Replace Powdercoating booths with 100% clean air booths.

B. Disconnect Tower

Both A and B targets have been completed.

Powdercoating Booth 1 – Powdercoat line was replaced in November 2007

Powdercoating Booth 2 – Large Item booth replaced in March 2009

The Towers have been disconnected, however, witches hats and roof penetration remain to act only as factory ventilation.

3. Generation Of Waste

Objectives

“To reduce the consumption of goods” and “To reduce the amount of waste going to landfill”.

Targets and Results

A. Raise awareness of environmental issues relating to purchasing amongst buyers and users of goods and services

Training was undertaken during the year, refer to Training Schedule. Ongoing training will be carried out as per the Training Schedule.

B. Recycling

	Target %	Result %	Measure
Office Paper	100	80	Visual / Records – monthly sample – Note 1
Factory Cardboard	100	90	Visual / Records – monthly sample
Other Packaging Materials	80	50	Visual / Records / factory discussion – Note 2
Toner Cartridges	100	0	Visual – Note 3
Aluminium Off cut	100	100	Visual / Records – Note 2
Timber Crates (untreated)	80	80	Visual / Records – Note 2
PVC & PP Off cut	100	100	Visual / Records
Steel Off cut	100	100	Visual / Records

Notes:

Visual/Records

- Visual check of activity
- Review of document procedure
- Check of records to track Contractor / type of disposal services and paper records for randomly selected shipments.

Note 1

- Some office paper still thrown into bins
- Recommend second “recycling bin” option beside each desk.

Note 2

- Some packaging materials such as shrink wrap and broken polystyrene is not recyclable
- Some cardboard is water damaged or glued to timber and not easily disassembled.

Note 3

- Users unwilling to change to refilled cartridges due to quality issues.
- Contract with photocopier company includes toner for two machines.

4. Noise Generation

Objectives

“To reduce OH&S issues of excessive noise for staff” and “To eliminate affect on local community”.

Targets and Results

A. Implement process controls to noise generation

All equipment capable of generating over 63db at 1 meter has noise attenuation barriers erected and signage that hearing protection is to be worn.

Ear plug dispensers are located adjacent to each entry of the factory and upon entry to the machine shed.

B. Reduce noise @ boundary to less than 35db @ 1mtr

Noise study by Eden Dynamics showed noise at the boundary from CSM operations to be less than 23db at 1 meter.

5. Chemical Use

Objective

To eliminate any adverse environmental effect either in normal operation or accident.

Targets and Results

A. Substitution of Chemical

Machinery specifications require certain oils and solvents and use of alternatives may void manufacturer’s warranty or may cause breakdown, such items are not planned to be substituted. The manufacturer has been requested to provide alternatives which meet target.

Certain chemicals such as Xylene and Kerosene have been reduced in quantity rather than replaced.

Less than 10 litres on factory floor.

Less than 20 litres open in Hazardous Liquids cabinet.

Less than 20 litres unopen in Hazardous Liquids cabinet.

Purchasing office to list all chemicals purchased for EMS Coordinator to review and research alternatives.

B. Raise Awareness

Tool box talks by EMS Officer to all staff by 30 June 2009

C. Reduce Holding of Liquids

See “substitution” above.

D. Adhere to Legislative requirements on quantities of chemicals

Copies of Legislative requirements in respect to relevant chemicals sited.

Visual checks to review purchase documentation state they are as well within requirements.

E. Store all chemicals in Hazardous

Visual checks

- All drums 20 litres or more stored in cabinets
- Containers 3 litres or less on floor, observe 1 litre of xylene in open container for cleaning.

Recommend – Leading Hands conduct visual check 1) at end of each day to ensure containers are returned to cabinets and 2) throughout the day to ensure cabinet doors are closed.

F. All other chemicals in Secure area fully bunged for “Total” spill situation

Visual Check “Bunged” area at 49 Cawarra Road was locked.

Minimal quantities of lubricant oils (less than 5 litres) beside machines conforming with SWMS for each machine.

In the event of total catastrophic loss these oils would not find their way to storm or ground water

Spill kits in marked positions

6. Consumption of Goods

Objectives

“To reduce the consumption of goods” and “To reduce the amount of waste going to landfill”.

Targets and Results

A. Raise awareness of environmental issues relating to purchasing amongst buyers and users of goods and services

Training has taken place, refer to training schedule.

Some resistance to change and seek environmentally friendly alternatives due to fears over quality and price.

Recommend EMS Officer works with Purchasing Officer on day-to-day items such as office supplies, factory consumables and staff amenities as a first step.

B. Replace 20% of all manufacturing input with recycled material OR raw material input with 20% recycled content

Steel sheets contains 15 to 35% recycled content (refer GECA submission)

Aluminium extrusions contain up to 70% recycled content (refer GECA submission)

PVC Slat contains up to 15% recycled content (refer GECA submission)

Training and awareness to continue – refer above.

7. Water Use

Objectives

“Eliminate Use of water in production” and “Provide positive impact on environment”.

Targets and Results

A. Remove all water based cleaning of Product

Completed March 2002

All water cleaning of material prior to powdercoating removed

Conversion to non-oil steel and cleaning of blemishes by “TACK” rag has been successful.

B. Install water recycling on welding equipment and/or energy efficient heat pump cooling.

Completed July 2008

2x spot welder cooled by heat pump

1x spot welder cooled by closed cooling system

C. Install rainwater harvesting and recycle water onto gardens, and grassed areas

Completed at both factories in May 2008.

D. Install rainwater harvesting and recycle water onto gardens, and grassed areas

Complete at 49 Cawarra Road in July 2008.

42 Cawarra Road is in the maintenance program to be completed by December 2010.

E. Install Grey Water recycling onto gardens

Rainwater is sufficient water requirement for factories.

Not proceeding at this stage. Water requirements will be monitored and proceed if rainwater harvesting is not sufficient.



CSM Office Furniture Solutions

**Environmental Management
Procedures Manual - Extracts**

Date: 28 March 2008



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1. Introduction

CSM Office Furniture Solutions Pty Ltd (CSM) has developed this Procedures Manual as part of an EMS designed to ensure a process of continual improvement in its environmental management and as part of its commitment to continued improvement in its environmental performance. The three core elements of the EMS are:

- The Environmental Policy
- The Procedures Manual
- The Procedures Registers

The Environmental Policy states, in a simple way, the environmental performance goals of the organisation and provides guidelines for the EMS. The Procedures Manual provides a set of management steps, focussing on the organisation's achievement of its environmental goals that form part of the wider management of the organisation's operations. The working documents, that house the information generated by following the environmental management procedures, are found within the Procedures Register.

The Procedures Manual considers all aspects of CSM's operations in order to manage any potential environmental impacts. The following sections of the manual contain all the environmental procedures that apply to the activities undertaken by CSM staff and contractors. The Procedures developed include those to guide the successful achievement of CSM's environmental commitments and adherence to legal obligations. The procedures also cover training requirements, the control and management of EMS documents, and instructions on how to respond to emergency incidents.

A Guide to the EMS has been developed to guide stakeholders on how CSM's EMS responds to each of the requirements of AS/NZS ISO 14001:1996. It is recommended that the Guide, because it provides an extensive overview of the EMS, also be used as an accompanying text to the Procedures Manual. It is strongly recommended that stakeholders involved in the development and maintenance of the EMS have a copy of the Standard to read in conjunction with the Procedures Manual.



2. Summary

PROCEDURE	DESCRIPTION
Environmental Aspects Procedure	Identifies CSM's environmental aspects and determines which environmental aspects have the potential for significant adverse environmental impacts.
Legislative and Other Requirements Procedure	Identifies legal and other requirements applicable to CSM's activities and functions and ensures their accessibility to stakeholders.
Objectives and Targets Procedure	Ensures that objectives and targets which apply to CSM's activities and functions are developed and documented.
Environmental Management Programme Procedure	Ensures that the Environmental Management Programme developed addresses schedules, resources and responsibilities.
Training, Awareness and Competence Procedure	Ensures that stakeholders have adequate environmental awareness and receive appropriate training to minimise any adverse environmental impacts as a result of CSM's activities and functions.
Structure and Responsibility Procedure	Ensures the roles, responsibilities and authorities of CSM's personnel are defined, documented and communicated to facilitate effective environmental management.
Communications Procedure	Ensures that internal communications within CSM's are maintained; documented evidence of communications are received; and that audits, management reviews and environmental assessments are communicated.
Documentation Procedure	Ensures that all EMS documents have a unique identification number, are revised and updated and disposed of in accordance with the Document Control Procedure
Document Control Procedure	Ensures the establishment and maintenance of document control.
Operational Control Procedure	Ensures that those activities associated with significant environmental impacts are carried out under controlled conditions. Controlled conditions are specified in Standard Operating Procedures (SOPs).
Emergency Preparedness and Response Procedure	Identifies the potential for accidents and emergency situations, and provides for plans to be established to minimise any associated adverse environmental impacts.
Environmental Monitoring and Measurement Procedure	Established to monitor and measure important aspects of CSM's operations to evaluate compliance with regulatory and other requirements.
Nonconformance, Corrective and Preventive Action Procedure	Ensures nonconformances are managed and investigated and that corrective and preventive actions are initiated and completed.



PROCEDURE	DESCRIPTION
Records Procedure	Ensures environmental records are identified, maintained and disposed.
Environmental Management System Audit Procedure	Ensures a programme and approach are established and maintained for undertaking periodic Environmental Management System Audits which will cover all aspects of CSM's EMS.
Management Review Procedure	Ensures the ongoing suitability and effectiveness of CSM's EMS and includes a review of the Objectives and Targets, Management Manual, Procedures Manual, Environmental Management Programme and the Standard Operating Procedures.



3. Environmental Aspects Procedure

Continuous improvement in environmental performance is one of CSM's Environmental Policy Goals. The Environmental Aspects Procedure has been established to identify CSM's Environmental Aspects and to determine which have the potential for significant Environmental Impacts. The Procedure addresses all activities and functions which impact upon the environmental performance of CSM.

Accountability

The EMS Coordinator shall ensure the implementation and maintenance of this procedure, together with all associated documents, such as the Register of Environmental Aspects and Impacts (EF005) are kept up to date.

Action Plan

The EMS Coordinator shall undertake and coordinate the following activities.

1. Identify the environmental aspects and associated potential environmental impacts of CSM's operations. Actions required include, but are not limited to, assessment of CSM's activities, interviewing site management and undertaking site inspections. For identification of aspects and impacts use Attachments A and B of the Register of Environmental Aspects and Impacts respectively.
2. Prioritise the identified impacts in terms of significance using the risk assessment model in Attachment C of the Register of Environmental Aspects and Impacts. The model assesses the environmental impacts according to:
 - the probability of occurrence; and
Risks of Occurrence are ranked in order from (a) continuous (b) frequent (c) occasional (d) remote and (e) improbable.
 - the severity of impact.
Severity (significance of impacts) are ranked in order from (a) positive impact (b) minor (c) critical (d) major and (e) catastrophic.
3. The model's assessment criteria are based on a consideration of CSM's business and environmental factors. This shall include consideration of such aspects as

Business Factors include: potential liability; difficulty and cost of changing impact; effects on public image, concerns of interested parties and effects on other operations.

Environmental Factors include: frequency and severity of the impact and duration on the impact.

4. Prepare a Register of Environmental Aspects and Impacts. List all aspects and associated impacts identified in the Register of Environmental Aspects and Impacts.
5. Review the Register EF005 not less than annually or whenever there are changes to the Agency's operations to ensure the information is kept current.



6. Store completed worksheets in Attachment D of the Register of Environmental Aspects and Impacts (EF005).

References

1. AS/NZ ISO 14001:1996, Section A.3.1 Environmental Aspects
2. The Guide to the EMS, Section 4.1 Environmental Aspects (EF002)
3. Register of Environmental Aspects and Impacts (EF005)



4. Objectives and Targets Procedure

It is essential that Objectives and Targets which are designed to minimise environmental impacts are documented and reviewed to facilitate continual improvement in CSM's environmental performance. This procedure has been developed to ensure that the Objectives and Targets which apply to CSM's activities and functions are documented. It applies to CSM's environmental aspects that have significant environmental impacts.

Accountability

The EMS Coordinator is responsible for coordinating the development of CSM's environmental Objectives and Targets, and for documenting and maintaining the CSM Environmental Objectives and Targets.

The EMS Management Team is responsible for reviewing the Objectives and Targets.

Action Plan

The EMS Coordinator shall undertake and/or coordinate the following activities to ensure the development and maintenance of CSM's environmental Objectives and Targets:

1. Develop environmental objectives and targets, having regard to the following:
 - The objectives and targets shall be relevant to the goals of the Environmental Policy.
 - The objectives and targets shall address the significant impacts that have been identified (refer to the Register of Environmental Aspects and Impacts (EF005)).
 - The objectives and targets shall be consistent with any legislative or other requirements that are applicable to CSM's activities and functions (refer to the Legislation Register (EF006)).
 - The objectives and targets shall be quantifiable where practicable, to provide evidence of improved environmental performance.
2. List all objectives and targets in a register. This Objectives and Targets Register (EF007) shall form the basis for any required changes to the objectives and targets.
3. The EMS Management Team shall review the objectives and targets annually. The review should take into account the following:
 - significant environmental aspects
 - legal and other requirements
 - technological options
 - views of interested parties
 - financial, operational and business requirements.
4. Review this procedure annually and following significant changes to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.3.3 Objectives and Targets
2. The Guide to the EMS, Section 4.3 Objectives and Targets (See EMS document (EF002)).



3. CSM's Objectives and Targets Register (EF007).
4. CSM's Legislation Register (EF006).



5. Environmental Management Programme Procedure

An Environmental Management Programme has been developed to enable the realisation of environmental objectives. This procedure has been formulated to ensure that the Environmental Management Programme developed is consistent with the ISO14001 Environmental Management System Standard. The Environmental Management Programme consists of Environmental Management Plans (EMPs) which assign responsibility for tasks and specify a timeframe. The EMPs apply to CSM's aspects with highly significant environmental impacts.

Accountability

The EMS Coordinator is responsible for coordinating development and maintenance of the Environmental Management Plans (EMPs), providing adequate resources to complete the task and for reviewing the EMPs. Responsibility for individual tasks are specified in the EMPs.

Action Plan

The EMS Coordinator shall undertake and coordinate the following activities to ensure the development and maintenance of CSM's EMPs:

1. Develop EMPs for those aspects of CSM operations identified as having significant environmental impacts (refer to the Register of Environmental Aspects and Impacts (EF005)).
2. Specify the actions required to meet each target, the responsible personnel and a timeframe in each EMP.
3. Review the EMPs on an annual basis and on changes to CSM's operations. Reviews are to be documented and form the basis of changes to the EMPs.
4. Review this procedure annually and following significant changes to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.3.4 Environmental Management Programme(s).
2. The Guide to the EMS, Section 4.4 Environmental Management Programme (EF002).
3. Environmental Management Programme (EF008).



6. Training, Awareness and Competence Procedure

Stakeholders, i.e. employees, contractors, suppliers, and customers all have a role and responsibility in meeting CSM's objectives and targets, and to manage and where practicable reduce its environmental impacts. This procedure has been developed to ensure that stakeholders have an adequate awareness of the CSM EMS and of their environmental roles and responsibilities in minimising adverse environmental impacts. CSM's most significant environmental impacts relate to the following:

- 1) Energy Consumption (Electricity and Gas)
- 2) Generation of Waste
- 3) Consumption of Natural Resources

Lesser potential impacts include:-

- 1) Emissions to Air
- 2) Chemical Use
- 3) Noise Generation
- 4) Water, Soil Contamination

Accountability

The EMS Coordinator is responsible for:

1. Implementing the requirements of this procedure;
2. Conducting stakeholder awareness programme; and,
3. Maintaining a training and awareness register.

Raising awareness: apart from specific training other methods may include:

- Writing EMS into the Employee Handbook
- Awareness a part of induction training;
- Circularising a policy statement and environmental reports to each employee;
- Internal training including toolbox talks and videos etc;
- Written guidance to staff and suppliers;
- Notice boards and posters;
- Staff suggestion schemes; and

Action Plan

The EMS Coordinator shall be competent in the management of an EMS and shall coordinate the following activities to ensure the implementation of this procedure.

1. Identify those aspects of CSM's activities that have a potential environmental impact through the use of the Aspects and Impact Register (EF005). The EMS co-ordinator will train and liaise with each Manager and Area supervisor/Leading Hand to correctly identify the organisation's environmental aspects and impacts.
2. Identify the information required by CSM employees and contractors to minimise any adverse environmental impacts.



For example: purchasing staff will need to be aware of energy rating requirements for the purchase of energy efficient electrical equipment, and packaging requirements to minimise the use of natural resources and waste generation. employees or contractors who work with dangerous chemicals will need to be made aware of the consequences of contamination should spillage occur, and trained in the safe handling and operational use of chemicals in terms of the SWMS and Product SDS,.

3. Develop a CSM Environmental Training and Awareness Programme for all stakeholders which addresses:
 - the importance of conformance with the environmental policy, procedures and the EMS;
 - the significant environmental impacts of their work activities;
 - their roles and responsibilities in achieving conformance (refer to Structure and Responsibility in Guide to the EMS and the Procedures Manual; and,
 - the potential consequences of departure from specified operating procedures including their legal and personal liabilities. Where there are penalties for departure from the EMS procedures, the penalties must be clearly documented and distributed.
4. Details of training requirements, content, dates, personnel involved and cost of the programme shall be documented by the EMS Coordinator in the Environmental Training and Awareness Programme and Register (EF009). All training and awareness communication shall be made in accordance with the Communications Procedure (EF010) and will include the contact details of the EMS Coordinator.
5. Review and revise the Training and Awareness Programme on an annual basis.
6. Review and revise this Procedure on an annual basis, and on significant changes to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.4.2 Training, Awareness and Competence.
2. The Guide to the EMS, Section 5.2 Training, Awareness and Competence (EF002).
3. Register of Environmental Aspects and Impact (EF005).
4. Environmental Training and Awareness Programme and Register (EF009).



7. Environmental Monitoring and Measurement Procedure

Ongoing monitoring of the functions and activities of CSM's operations that have significant environmental impacts is required to evaluate environmental performance and compliance with the EMS. This procedure has been established to ensure monitoring and measurement of CSM's environmental performance is undertaken to evaluate compliance with legal and other requirements, and with the CSM EMS.

Accountability

The EMS Coordinator is responsible for the following:

- Ensuring this procedure is implemented by CSM personnel and contractors who have monitoring responsibilities.
- Undertaking reviews of all monitoring and measurement records, and evaluate the findings against CSM EMS requirements.
- Identifying areas of CSM's activities where impacts are not monitored and measured and introduce appropriate monitoring to evaluate performance. This will be completed by both casual factory and office walk-throughs, during the formal audits, issues arising/ reported by the Safety committee, and interviews with operations staff.
- Participating in Environmental Management Reviews to assess the performance of the EMS.

Action Plan

The EMS Coordinator shall undertake and coordinate the following activities to ensure there is effective monitoring and measurement of CSM's environmental performance:

1. Derive Key Performance Indicators to be monitored and recorded for each target. Record the indicators in the Environmental Management Plans (EF008-1) contained within the Environmental Management Programme (EF008).
Environmental Performance Indicators to include such measures as:
 - quantity of raw material used;
 - number of environmental incidents/accidents;
 - percentage waste recycled;
 - percentage recycled material used in packaging;
 - investment in environmental protection;
 - Volume of Gas and quantity of electricity consumed

The basis of testing to be 6 monthly

2. Incorporate Monitoring and Measuring instructions into the Standard Operating Procedures (EF014), and include Environmental Record requirements.
3. Maintain and store records of all environmental monitoring undertaken. Store Environmental Records in the Document Control File (EF011).
4. Review Environmental Records annually and assess achievements against Objectives and Targets. Produce a Review Report and store the Review Report in the Document Control File (EF011). For areas identified in the review as requiring corrective action a



Nonconformance and Corrective Action Report (EF016) should be completed (refer to the Nonconformance, Corrective and Preventative Action Procedure (EF004)).

5. This Procedure should be reviewed on an annual basis, and when significant changes occur to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.5.1 Monitoring and Measurement.
2. The Guide to the EMS, Section 6.1 Monitoring and Measurement (EF002)
3. Environmental Objectives and Targets (EF007).
4. Standard Operating Procedures (EF014).
5. Environmental Management Programme (EF008).



8. Environmental Records Procedure

Records of all activities and functions related to environmental issues are required, to demonstrate the level of environmental management and performance achieved by CSM. These records also serve to demonstrate the degree of effectiveness of the EMS.

The CSM EMS consists of one EMS file containing original copies of EMS documents and environmental records. The CSM EMS file and all material contained within are controlled documents. Original documents must not be removed from the file, however copies of originals are not controlled and can be freely distributed as required. The Environmental Records Procedure (EF004) has been incorporated into the Document Control Procedure (EF011) and instructions on management of environmental records are contained in the Document Control Procedure (EF011).

This Procedure should be review on an annual basis, and when significant changes occur to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.5.3 Records.
2. The Guide to the EMS, Section 6.3 Records (EF002).
3. Procedures Manual, Section 9 Document Control Procedure (EF004).



9. Environmental Management System Audit Procedure

This procedure has been developed to establish and maintain a programme and methodology for undertaking periodic audits of the CSM EMS. Audits are necessary to determine whether CSM's activities and functions conform with the Environmental Policy, elements of the EMS and the International Standard. An ongoing programme of environmental audits is based on the relative environmental impact of the different CSM activities together with outcomes and recommendations from previous audits.

EMS Audits should be conducted on a regular basis to ensure that the EMS is functioning adequately and to identify any deficiencies.

The audits will follow the following standards:-

ISO 14010: 1996 Guidelines for environmental auditing – General Principles;
ISO 14011: 1996 Guidelines for environmental auditing – Audit procedures – Auditing of Environmental Management Systems;
ISO 14012: 1996 Guidelines of environmental auditing – Qualification criteria for environmental auditors.

Accountability

The EMS Coordinator is responsible for the authorisation of the EMS Audit programme. The EMS Coordinator is responsible for ensuring the requirements of this procedure are implemented by undertaking and co-ordinating the following activities:

- Ensuring audit personnel are suitably trained and independent of areas of CSM they audit;
- Engaging suitably qualified external auditors to carry out third party audits of the EMS;
- Developing the EMS audit schedule and ensuring its adherence;
- Reviewing EMS Audit Reports and advising relevant CSM staff and contractors of the outcomes of the audit;
- The EMS Coordinator shall initiate and/or implement the requirements of a Nonconformance and Corrective Action Procedure and Report whenever corrective action is required as a result of an audit; and
- All CSM personnel and contractors have a responsibility in co-operating with auditors by providing accurate and timely information when requested.

Action Plan

The EMS Coordinator shall undertake and coordinate the following internal audit programme to assess conformance with the CSM EMS:

1. The following elements of the EMS shall be addressed in the audit schedule:
 - i.) Aspects and Impacts;
 - ii.) Legal and Other Requirements;
 - iii.) Objectives and Targets;
 - iv.) Environmental Management Programme;



- v.) Structure and Responsibility;
 - vi.) Training , Awareness and Competence;
 - vii.) Communication;
 - viii.) Documentation;
 - ix.) Document Control;
 - x.) Operational Control (including Standard Operating Procedures);
 - xi.) Emergency Preparedness;
 - xii.) Measuring and Monitoring;
 - xiii.) Nonconformance and Corrective and Preventive Action; and
 - xiv.) Environmental Records.
2. Develop an audit schedule containing a Register of Internal Auditors, their areas of responsibility, and a timetable of audits to be undertaken.
 3. The EMS elements shall be audited annually and any identified nonconformances shall be recorded and subject to prompt corrective action.
 4. The internal audit schedule shall be reviewed annually and revised to reflect any improvements to the methodology, auditors or timetable.
 5. The audit methodology shall be in a checklist format and based on objective evidence that will generally comprise of documented environmental records and direct observations of nonconforming practices. Examples include monitoring and measuring data and its level of completeness, documented evidence of improvements following a nonconformance, meeting awareness requirements and following the CSM communications procedure.
 6. An Audit Report shall be completed within 3 weeks of completing the audit and shall be forwarded to the EMS Coordinator for storage in accordance with the Environmental Records Procedure (EF004).
 7. Where nonconformances are identified, a copy of the Nonconformance and Corrective Action Report (EF016) shall accompany the Audit Report and be sent to the EMS Coordinator, and CSM Senior Management to ensure appropriate corrective action is taken in a timely manner.
 8. Subsequent audits of an operational area of CSM shall in particular address any previous nonconformances identified and ensure that the corrective action put in place prevents a recurrence.
 9. This Procedure should be review on an annual basis, and when significant changes occur to CSM's operations.

References

1. AS/NZ ISO 14001:1996, Section A.5.4 Environmental Management System Audit.
2. The Guide to the EMS, Section 6.4 Environmental Management System Audit (EF002).
3. Environmental Audit Reports (EF003).



Register of Environmental Aspects and Impacts

Process :- Steel Cabinet Fabrication, welding, Assembly and Powdercoating

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections of CSM's premises. The significance of each impact will be assessed using the Risk Assessment Model in Attachment C.

High Significance Impacts are indicated in **bold** print in the following table.

Activity	Aspect	Impact
Process Steel Cut/Punch/Fold	Consumption of Raw materials	Conservation of natural resources (1)
	Consumption of energy (e.g electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution (2); Consumption of natural resources (3);
	Generation of waste/scrap)	Consumption of space for waste disposal (4)
Process -Welding	Generation of Noise	Acoustic Impact on Staff/Local Community (5) Public Annoyance/Nuisance(6)
	Consumption of Raw materials	Conservation of natural resources (7)
	Consumption of energy (e.g electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution (8); Consumption of natural resources (9);
	Consumption of Water	Conservation of natural resources (10)
	Generation of Waste	Consumption of space for waste disposal (11)
Process – Painting/Powdercoating	Emissions to Air	Atmospheric Pollution(12)
	Consumption of Raw materials	Conservation of natural resources (13)
	Consumption of energy (e.g electrical equipment and facilities Gas ovens	Release of greenhouse gases and atmospheric pollution (14); Consumption of natural resources (15); Heat discharge to environment(16)
	Storage, Use and release of chemicals	Potential contamination of air, storm and ground water or soil (17); risk to human health (18)
	Generation of Waste	Consumption of space for waste



Activity	Aspect	Impact
	Emissions to Air	disposal (19) Atmospheric Pollution(20)
Assembly of cabinets/shelving	Consumption of Raw materials Consumption of energy (e.g electrical equipment and facilities) Generation of Waste	Conservation of natural resources (21) Release of greenhouse gases and atmospheric pollution (22); Consumption of natural resources (23); Consumption of space for waste disposal (24)
Packaging of cabinets and Shelving	Consumption of Raw materials Consumption of energy (e.g electrical equipment and facilities) Generation of Waste	Consumption of natural resources (25) Release of greenhouse gases and atmospheric pollution (26); Consumption of natural resources (27); Consumption of space for waste disposal 28)



Attachment A – Identification of Environmental Aspects
Process: Steel Cabinet Fabrication, Welding, Assembly and Powdercoating

Completed by:	EMS Coordinator
Date:	25 March 2008

Activity	Environmental Aspects							
	Consumption of Goods	Consumption of Energy	Consumption of Water	Storage, use and release of chemicals / dangerous goods	Generation of Waste	Generation of Noise	Emissions to Air	Release to Water / Soil
Cut, Punch, Fold	✓	✓				✓		
Welding	✓	✓	✓		✓		✓	
Powdercoating Paint	✓	✓		✓	✓			
Assembly	✓	✓						
Packaging	✓				✓			



Attachment B – Identification of Environmental Impacts

Process: Steel Cabinet Fabrication, Welding, Assembly and Powdercoating

Completed by:	EMS Coordinator
Date:	25 March 2008

Aspect	Environmental Impacts									
	Air Pollution	Stormwater Contamination	Groundwater Contamination	Soil Contamination	Waste Disposal	Consumption of Natural Resources	Global Warming	Ozone Depletion	Acoustic Impact on Staff & Community	Public Annoyance / Nuisance
Consumption of Energy	✓					✓	✓			
Emissions to Air	✓									
Waste Generation					✓	✓				
Noise Generation									✓	✓
Chemical Use	✓	✓	✓	✓	✓					
Consumption of Goods					✓	✓				



storage & filing solutions

Attachment C – Risk / Significance Assessment Model

Continuous			1, 2, 3, 15		
Frequent		9, 12, 14, 16, 19, 25	4, 7, 13, 28		
Occasional		5, 6, 10, 11, 21, 22, 23, 24, 26, 27	8		
Remote		20		17, 18	
Improbable					
	Positive	Minor	Critical	Major	Catastrophic

Significance (degree of impact)

Positive impact on environment thus positive impact on business	Limited and/or localised impact on the environment and/or business	Reversible impacts, wider implications to environment and/or business	Serious long term implications for environment and/or business	Serious permanent damage to the environment and/or business
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Risk of Occurrence

May be as a result of a continuously operated process, activity or occurrence
May be as a result of a frequently used process, activity or occurrence
May be as a result of a little used process, activity or occurrence
May be as a result of a chain of unusual events leading to an environmental incident
May be as a result of a chain of extraordinary events leading to an environmental incident

Key to Significance Rating	
Positive	
Low	
Medium	
High	

Completed By:	EMS Coordinator
Date:	25 March 2008





Environmental Objectives and Targets

CSM's Environmental Policy states 'The Company is committed to operating in an ecologically sustainable manner by reducing waste and the use of energy and resources'. The Company's Objectives and Targets have been set to meet these Environment Policy requirements and the Departments activities identified as having the most significant environmental impacts.

Aspect	Impact	Objective	Target
1) Energy Consumption	Release of greenhouse gases and atmospheric pollution Consumption of natural resources Global Warming Global Warming	To reduce energy consumption To reduce carbon footprint To reduce Greenhouse gases from Energy production	Reduce energy consumption by 20% Undertake Energy Audit Replace all Office Lighting with high efficiency T5 or equivalent globes. Replace all factory lighting with Low Kelvin high efficiency lighting Purchase only appliance for kitchens and offices with a four-star energy rating Fit Load/current sensing equipment to machinery supply switchboards Replace seals and air curtains to reduce heat losses on ovens To have 25% of energy generated from renewable sources
2) Emissions to Air	Air Pollution Public Annoyance/Nuisance	To eliminate Air Pollution and discharges of powdercoating particulates under all normal operating situations	Replace Powdercoating booths with 100% clean air booths. Disconnect towers



Aspect	Impact	Objective	Target
3) Generation of Waste	Conservation of natural resources Consumption of space for disposal	To reduce the consumption of goods To reduce the amount of waste going to landfill	Raise awareness of environmental issues relating to purchasing amongst buyers and users of goods and services Recycle 100% of office paper Recycle 100% factory cardboard Recycle 80 of other packaging materials Recycle 100% of toner cartridges Recycle 100% of Aluminium off cut Recycle 80% of timber crates (treated crate to appropriate disposal points) Recycle 100% of PVC and PP off cut Recycle 100% of Steel off cut
4) Noise Generation	Acoustic Impact on Staff & Community Public Annoyance/Nuisance	To reduce OH&S issues of excessive noise for staff To eliminate affect on local community	Implement process controls to noise generation Ensure staff have appropriate PPE Reduce noise emission to 65db @1mtr for all equipment Reduce noise @ boundary to less than 35db @ 1mtr
5) Chemical Use	Air Pollution Stormwater Contamination Groundwater Contamination Soil Contamination Waste Disposal Public Annoyance/Nuisance	To eliminate any adverse environmental effect either in normal operation or accident.	Substitute chemicals identified in OH&S Hazard Identification procedures as being class 3 or above for "low risk environmentally friendly chemicals". Raise awareness of environmental issues relating to purchasing amongst buyers and users of goods and services Reduce holding of Hazardous chemicals to less than 40ltrs Adhere to Legislative requirements on



Aspect	Impact	Objective	Target
			<p>quantities of chemicals Store all chemicals in Hazardous Chemical cabinets with spill trays capable of containing a "Total loss" situation</p> <p>All other chemicals in Secure area fully bunged for "Total" spill situation.</p>
6) Consumption of Goods	<p>Conservation of natural resources Consumption of space for disposal</p>	<p>To reduce the consumption of goods To reduce the amount of waste going to landfill</p>	<p>Raise awareness of environmental issues relating to purchasing amongst buyers and users of goods and services. Replace 20% of all manufacturing input with recycled material OR raw material input with 20% recycled content</p>
7) Water Use	<p>Consumption of Natural Resources Air Pollution Stormwater Contamination Groundwater Contamination Soil Contamination Waste Disposal Public Annoyance/Nuisance</p>	<p>Eliminate Use of water in production Provide positive impact on environment</p>	<p>Remove all water based cleaning of product Install water recycling on welding equipment and/or energy efficient heat pump cooling. Install rainwater harvesting and recycle water onto gardens, and grassed areas. Install Grey water recycling onto gardens.</p>



Environmental Training and Awareness Program and Register

Awareness/Training Need	Stakeholder (Section/Company, Name, Contact No)	Action to be taken	Timeframe	Outcome
1. Knowledge of EMS to enable implementation and maintenance of the EMS by EMS Coordinator	EMS Coordinator	Bachelor of Science – Environmental Science	3 years	Complete
		SAI Global ISO 14000 and EMS	4 days	
2. Introductory EMS Awareness for Senior Management	Senior Management	EMS Coordinator prepare EMS Brief (handout) and distribute to Senior Management	8/2008	Complete
3. Introductory EMS Awareness for Environmental Management Team	Environmental Management Team	EMS Coordinator present briefing session and provide handout to Environmental Management Team	8/2008	Complete
4. Introductory EMS Awareness for all Staff	All existing Staff Sections All new staff	EMS Coordinator update Employee Hand Book and Induction Program	10/2008	Complete
		All Staff Refresher Employee Induction and EMS updates- Toolbox talks by EMS Co-ordinator	10/2008	Complete for Existing Staff –
		All New staff Employee Induction and EMS by EMS Co-ordinator	1 hour	New Staff On-going as required
5. Introductory Awareness of	All Key Suppliers and	EMS Coordinator to prepare letter to		On Going



Awareness/Training Need	Stakeholder (Section/Company, Name, Contact No)	Action to be taken	Timeframe	Outcome
EMS for contractors and suppliers	ALL Contractors	suppliers and contractors advising of CSM's EMS and commitment to improve environmental performance.		
6. Inform Environmental Management Team of their EMS responsibilities	Environmental Management Team	EMS Coordinator to prepare memo to Environ. Mgt. Team advising of their EMS responsibilities for eg. all environmental correspondence to be directed to EMS Coordinator on receipt for response	8/2008	Complete
7. Paint shop Staff to be trained on procedures for Safe handling of powder , disposal and bagging of excess powder, spills, security of disposal bins.	Paint Shop staff	Toolbox Talks by Factory Manager, EMS co-ordinator and Leading Hands	8/2008	Complete for existing staff
8. All staff training on Chemical and Oil spills, use of spill kits, safe handling of chemicals, first aid procedurs for minor accidents and MSDS use.	All Staff	Toolbox Talks by Factory Manager, EMS co-ordinator and Leading Hands	8/2008	Complete for existing staff
9. Office recycling		EMS Co-ordinator address Admin, Engineering and Sales meetings on recycling and buying recycled product	10/2008	On-Going



CSM Product Stewardship

Purpose

CSM have been working to reduce the environmental impacts of their operations and products.

CSM acknowledges that Product Stewardship is an approach that recognises that manufacturers, importers, governments and consumers have a shared responsibility for the environmental impacts of a product throughout its full life cycle. Product Stewardship schemes establish a means in the product chain to share responsibility for the products they produce, handle, purchase, use and discard.

Framework

The CSM proposed product stewardship framework will promote sustainable development by:

- Improving the efficiency of resource use in products;
- Increasing resource recovery;
- Minimising the generation of waste (including hazardous substances);
- Improving the management of post-consumer waste;
- Reducing the risks to human health from poor management of products; and
- Incorporating product management costs into consumer price signals.

CSM provides and maintains:

- A product end-of-life take-back scheme;
- A product labelling requirement.

Product Stewardship

At the manufacturing stage CSM includes having waste issues considered when decisions are made on the choice of material, the design of the product, the manufacturing process and efficiency of the resource use. It can also include mechanisms such as resource recovery from waste and improved disposal of products.



The Objectives for CSM's Product Stewardship

Objective 1: Use resources more efficiently and reduce the volume of waste produced

Product stewardship increases resource efficiency. CSM acknowledges the financial responsibility for the end-of-life waste management costs of our products including the elimination of excessive packaging or components that are costly or not able to be recycled. Our commitment extends to improve design so that fewer resources are used by a product in its everyday manufacturing function as, for example, in the introduction of improved technology which uses less energy, a reduction in scrap and no water in the production process.

Objective 2: Increase the resources recovered

The CSM Product stewardship scheme focus's on take-back mechanisms for our products. The development of these mechanisms, result in economies of scale for recycling operations, leading to increased resource recovery. Good design also assists the 'de-construction' of products and the recovery of materials.

Objective 3: Include the costs of waste management into the price of products

CSM's Product stewardship shifts the burden for managing special wastes away from the general ratepayer on to those who produce the products and those who buy them. In this way it helps to internalise the environmental costs involved in managing products through their life cycle. Internalising these costs provides economic incentives to use resources efficiently. It is also in keeping with the polluter-pays principle.

Objective 4: Enhance product design

The efficiency with which a product uses resources is also an important feature of design. Better design for this can provide improvements in other areas. For example, reducing the number of components and having fewer different materials in the product can improve product reliability as well as making resource recovery from the used product easier.

Objective 5: Provide product stewardship that is effective and efficient

CSM's Product stewardship scheme targets areas where wastes are a significant problem and where worthwhile reductions in resource use and harm can be achieved.

Our scheme is transparently managed, with the responsibilities of all the parties clearly defined and monitored to ensure the schemes effective operation. CSM provides industry leadership and effective participation.

The internationally recognised range of CSM storage products has been designed for the environment and engineered to the highest standards. CSM's Warranty* covers structural failure and defects in materials and workmanship in new products manufactured by CSM.

To find out more about CSM's Product Warranty* simply contact your sales consultant.



*** Conditions apply.**

*Warranty covers CSM Manufactured product only.
Please refer to CSM's full terms and conditions.*

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CSM Disassembly Statement

All CSM products have been designed for disassembly. For most storage products (including products such as shelving, mobile shelving and cabinets) damaged components, components such as doors, tops, sides etc may be removed and replaced insitu with non-specialised tools. Welded/riveted product is also easily disassembled in the factory.

Carcasses may be disassembled in the factory using non-specialised tools:

- Recyclable by mass - 98%
- Castors Plastic - 80% Recyclable
- Runners - Steel 95% Recyclable
- Carcass - Steel 10% Recyclable

Tambour Door Cabinets

The tambour cabinets can be fully disassembled in factory with non-specialised tools.

- Recyclable Components by Mass - 99%
- Steel Carcass - 100% Recyclable
- Locks and Adjustable Feet - will require additional disassembly



Good Environmental Choice Australia

“A commitment to credible product information
for sustainable development”

THE AUSTRALIAN ECOLABEL PROGRAM

LICENCE NO: CSM - 2007

ISSUED TO:

CSM Office Furniture Solutions Pty Ltd

PRODUCTS NAME:

**Metal Storage Cabinets
Mobile Shelving Units
Systems Shelving
Mobile Pedestals**

STANDARD:

GECA 28-2005 – Furniture and Fittings

SITE ADDRESS:

49 Cawarra Rd.
Caringbah
Sydney, NSW 2229

Re-certification Date:

12th of July 2010

Petar Johnson

Chairman

Good Environmental Choice Australia Ltd