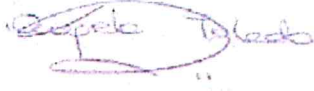


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Prepared	Reviewed	Approved
 EDPR EU EMS Manager	 EDPR EU EMS Management Representative	 EDPR EU EMS Management Representative
Name: ANGELA TOLEDO	Name: MANUEL FERNANDEZ	Name: MANUEL FERNANDEZ
Date: 1-9-15	Date: 02/09/2015	Date: 02/09/2015

0 CHANGE CONTROL

Edition	Date	Description of the modification
00		Initial edition
01	September 2015	Inclusion of photovoltaic solar plants in the EMS scope. References to PROSAFETY tool. Reference to the Environmental and Biodiversity Policies and Principles of Sustainable Development.

1 INTRODUCTION

EDP Renewables (EDPR) is a leading, global renewable energy company devoted to value creation, innovation and sustainability. It operates in markets around the globe and is continuously expanding the business to new regions, making the commitment to lead in each market as well as create value for stakeholders and shareholders.

EDPR's global presence is managed by two regional platforms which oversee the development, construction and operation of assets in their geographic areas, EDPR Europe and EDPR North America.

EDP Renewables Europe (EDPR EU) is present in the European countries with the best markets, operating with a passion for continuing to be among the industry leaders. This passion for growth has been demonstrated in its remarkable development in the recent years, which positioned the company among the main growing companies in the industry worldwide.

2 OBJECTIVE AND SCOPE

This Manual describes all the basic features of the EDPR EU Environmental Management System, and more particularly its organization, structure, responsibilities, procedures, processes and resources available to ensure:

- The objectives set out in the Environmental Policy.
- The continuous improvement in the organization's environmental performance.

Where necessary, references are made to the general procedures to complement the information contained in this Manual.

The EMS scope is:

Operation and maintenance of wind farms and photovoltaic solar plants in EDPR EU

The facilities included in the EMS scope are detailed in the file *Facilities in the EMS scope*.

The EMS shall apply to EDPR EU activities and services, whether they are:

- Past or present.

- Permanent, temporary or casual.
- Carried out by employees or external parties (temporary workers, contractors, service providers, etc.).

3 REFERENCES

- ISO 14001:2004 standard
- PLY-EU/EMS-GEN-00001 "Principles of Sustainable Development"
- PLY-EU/EMS-GEN-00002 "Environmental Policy"
- PLY-EU/EMS-GEN-00003 "Biodiversity Policy"
- GD-EU/EMS-GEN-00002 "EMS Guide"

4 DEFINITIONS

- **Continual improvement:** recurring activity to enhance performance.
- **Environmental Management System:** part of the management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities.
- **Environmental Policy:** the intentions and direction of an organization related to its environmental performance as formally expressed by top management.
- **Environmental performance:** measurable results of an organization's management of its environmental aspects.
- **Management system:** set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives.
- **Process:** set of interrelated or interacting activities which transform inputs into outputs. The processes can be documented or not.

5 ABBREVIATIONS

- **Business Unit:** BU.
- **EMS:** Environmental Management System.
- **EDPR EU:** EDP Renewables Europe.
- **EMS Manager:** EMS Manager in each country.

6 ENVIRONMENTAL MANAGEMENT SYSTEM

EDPR EU establishes, documents, implements, maintains and continually improves an EMS in accordance with the requirements of the International Standard ISO 14001:2004 and determines how it fulfils these requirements.

The three main values of the EMS are:

- To guarantee the environmental legal compliance.

- To focus the efforts on the relevant environmental aspects of the business.
- To help effectively set environmental objectives and targets.

The process to implement an EMS requires:

- Commitment to the environment.
- Proactive team working in the EMS (EDPR EU and Business units).
- Environmental assessment in the facilities included in the EMS scope.
- Identification of environmental aspects and legal and other requirements.
- Establishment of actions and implementation of procedures and other documents to comply with the requirements of the standard ISO 14001:2004 and other requirements established by EDPR EU.
- Dissemination of the documentation, awareness and training.

The Management is responsible for establishing the Environmental Policy and making decisions regarding the development, implementation, maintenance and improvement of the EMS, ensuring the availability of adequate resources, essential to carry out the Environmental Policy and achieve its objectives, tending the impacts on the environment on a continuous basis.

6.1 EMS FRAMEWORK

In order to protect the environment, EDPR's strategy is based on an environmentally responsible management of the facilities. This strategy is defined in the Environmental and Biodiversity policies and the Principles of Sustainable Development.

These policies and principles reflect a responsible management of the environment along the whole value chain; from the very early stages of project development – when it is critical to perform environmental and social feasibility studies – to the decommissioning of our facilities.

6.1.1 Principles of Sustainable Development

EDPR believes that sustainable development is possible and is committed to guiding the business activity in accordance with the Sustainable Development Principles of the EDP Group.

The Principles of Sustainable Development are available in the corporate tool *Internal documentation* (PLY-EU/EMS-GEN-00001 "*Principles of Sustainable Development*"), as well as in the EDPR website.

6.1.2 Environmental Policy

EDPR understands natural resources and the environment as a global public good and considers that proactive environmental management generates value and constitutes the duty of any environmentally responsible company.

EDPR's ambition in the international setting in which it operates is to be leader and a benchmark in its business environmental management as well as in stakeholder involvement in related good practices promotion and implementation.

The company fosters a corporate culture in which the business initiatives and activities are consistent with the environmental responsibility and encourages the innovation and continuous improvement in products, services and environmental performance.

In this regard, the Executive Committee approved the EDPR Environmental Policy in January 2011.

The EDPR Environmental Policy:

- is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services;
- includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization;
- includes a commitment to fulfil with its environmental compliance obligations;
- includes a commitment to continual improvement of the EMS to enhance environmental performance;
- provides the framework for setting environmental objectives and targets;
- is documented, implemented and maintained;
- is communicated to all persons working for or on behalf of the organization;
- is available to the public.

The Environmental Policy is available in the corporate tool *Internal documentation* (PLY-EU/EMS-GEN-00002 "*Environmental Policy*"), as well as in the EDPR website.

6.1.3 Biodiversity Policy

The Executive Committee approved the EDPR Biodiversity Policy in January 2011.

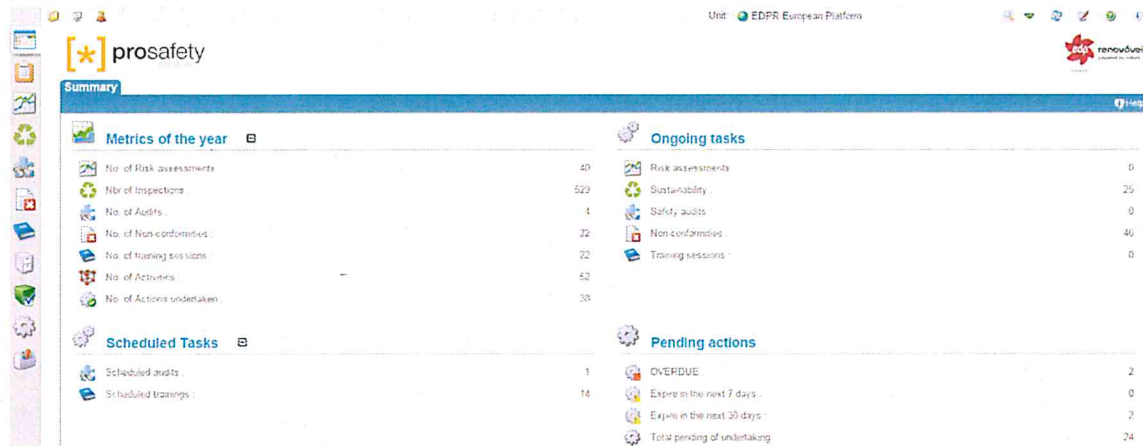
With the implementation of its Biodiversity Policy, EDPR contributes to the world's objective of reducing biodiversity loss due to human activity, in particular:

- Is aware of the sensitivity of natural ecosystems and of the pressures that these are subjected to, as well as of the intrinsic value of the initiatives aimed at protecting biodiversity;
- Has significant experience in minimizing the impact on biodiversity resulting from its activities;
- Wants to have an increasingly active role in the conservation of biodiversity and its promotion.

The Biodiversity Policy is available in the corporate tool *Internal documentation* (PLY-EU/EMS-GEN-00003 "*Biodiversity Policy*"), as well as in the EDPR website.

6.2 EMS SUPPORT TOOL - PROSAFETY

PROSAFETY is the corporate support tool for the EDPR EU EMS. A collaborative program that allows teamwork, engaging all employees to participate in the environmental management of the company.



It is made up of different modules that enable a centralized management of the EMS tasks, allowing more transparency and reducing the paperwork commonly associated with management systems.

Business units working with this tool shall consider the notes included in sections 6.3 to 6.8 regarding the use of PROSAFETY.

For technical aspects of the tool or doubts about how it works, please check the *PROSAFETY User Guide*.

6.3 PLANNING

6.3.1 ENVIRONMENTAL ASPECTS

EDPR EU has established the general procedure EXPR-EU/EMS-GEN-00001 *"Identification and assessment of environmental aspects"* in order to:

- Identify the environmental aspects of its activities, products and services within the defined scope of the EMS that the organization can control, and those that it can influence, taking into account planned or new developments, or new or modified activities, products and services;
- Determine those aspects that have or can have significant impacts on the environment and prioritize the areas of improvement of the company.

The EMS Manager performs the identification and assessment of environmental aspects periodically and whenever there is any change in the facilities.

6.3.2 COMPLIANCE OBLIGATIONS

To ensure that legal and other requirements related to environmental issues are always considered, EDPR EU has established the general procedure EXPR-EU/EMS-GEN-00002 *"Identification and assessment of compliance obligations"*.

This procedure describes the process of identification and assessment of compliance obligations of environmental character applicable to EDPR EU.

The process is supported by SALEM, the corporate tool for the identification and assessment of compliance obligations.

6.3.3 ENVIRONMENTAL OBJECTIVES

EDPR EU has permanently in place objectives and targets for the continual improvement of its environmental performance. These objectives shall be consistent with the Environmental Policy and shall include the following commitments: prevention of pollution, compliance with applicable legal and other requirements and continual improvement.

The objectives and targets shall take into account:

- EDPR sustainability goals.
- Relevant environmental aspects.
- Legal requirements and other environmental conditions.
- Repetitive legal breaches.
- Results of management review and the compliance of prior objectives and targets.
- Technological aspects and the financial, operational and business requirements.
- Stakeholder's expectations.

The process to follow for establishing and monitoring the objectives, targets and programs is defined in the general procedure EXPR-EU/EMS-GEN-00003 *"Environmental objectives and targets"*.

The Program of environmental objectives and targets is reviewed at least, every twelve months, although the objectives/targets implementation and achievement may span more than one year.

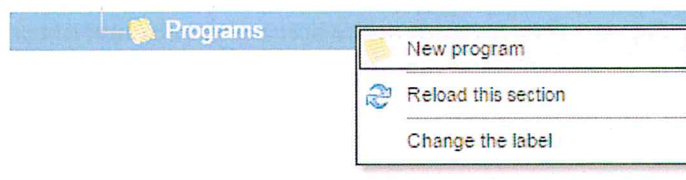
The Program can be modified, if required, by the possible emergence of new activities, processes or requirements that may affect the environment. This ensures that environmental management is also applied to the new activities, requirements and processes.

6.3.3.1 Prosafety

Based on what's established in the general procedure EXPR-EU/EMS-GEN-00003 *"Environmental objectives and targets"*, following are some general notes for the business units working with PROSAFETY:

- The EMS Manager defines the *Program of environmental objectives and targets* in PROSAFETY through the module “Administration” instead of using the excel template TMP-EU/EMS-GEN-00002.


Administration > Objectives > Programs > New program





Program | Action plan | Follow-up | Closure | Attachments


Program data

Registered by / Date: ANGELA TOLEDO MORALES (8/28/2015 12:20 PM) Status:

Unit: 

Start date: 

End date: 

Responsible: 

Title:

Observations:

Objectives and goals data

Goals	Order	Objective	Responsible	Multiple assignment	Status	View details
Add new record						

Approval

Responsible signature:

- For the approval of the *Program of environmental objectives and targets*, the EMS Manager can export the Program to pdf format, print it and give it to the Country EMS Management Representative for its signature of approval. Once signed, the EMS Manager scans the Program and upload it into PROSAFETY as an attachment.
- The communication of the Program to the departments involved in its implementation and achievement shall be made through PROSAFETY.
- The EMS Manager monitors the progress in the implementation of the environmental objectives and targets in PROSAFETY through the module “Administration” instead of using the excel template TMP-EU/EMS-GEN-00002.

Administration > Objectives > Programs

- Choose the Program of environmental objectives and targets:

Programs							Page 1 of 1
Code	Unit	Title	Responsible	Start date	End date	Status	
2015-000003	EDPR Italia	Program of the objectives and targets for period: June 2015- December 2016	SILVIA SALINI	6/26/2015	12/30/2016	Draft	
2015-000001	EDPR Italia	Program of the objectives and targets for years 2014-2015	SILVIA SALINI	9/30/2014	12/31/2015	Draft	

- Click on *Edit* and record the progress of implementation of the objectives using the *Follow-up* tab:

Program Action plan **Follow-up** Closure Attachments

Program: Program of the objectives and targets for period: June 2015- December ... (Draft)

☐ Follow-up

6.4 SUPPORT

6.4.1 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY

The Management shall ensure the availability of resources to establish, implement, maintain and improve the EMS. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

This Manual and the general procedures define the roles, responsibilities, authorities and the interrelation between people involved, directly or indirectly, in the EMS processes.

The organizational chart regarding the EDPR EU EMS is established in the Annex I of this Manual.

Responsibilities and qualifications of each function involved in the EMS are documented.

The process to be followed to identify and provide the resources necessary to fulfil the requirements of the EDPR EU EMS is defined in the general procedure EXPR-EU/EMS-GEN-00004 "*Competence, training and awareness*".

6.4.2 COMPETENCE, TRAINING AND AWARENESS

EDPR EU ensures that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact, is (are) competent on the basis of appropriate education, training or experience, and retains associated records.

As well, training needs associated with its environmental aspects and the EMS are identified.

The general procedure EXPR-EU/EMS-GEN-00004 "*Competence, training and awareness*" sets the EDPR EU process to ensure that people working in the company and on its behalf are aware of:

- the importance of conformity with the Environmental Policy and procedures and with the requirements of the EMS;

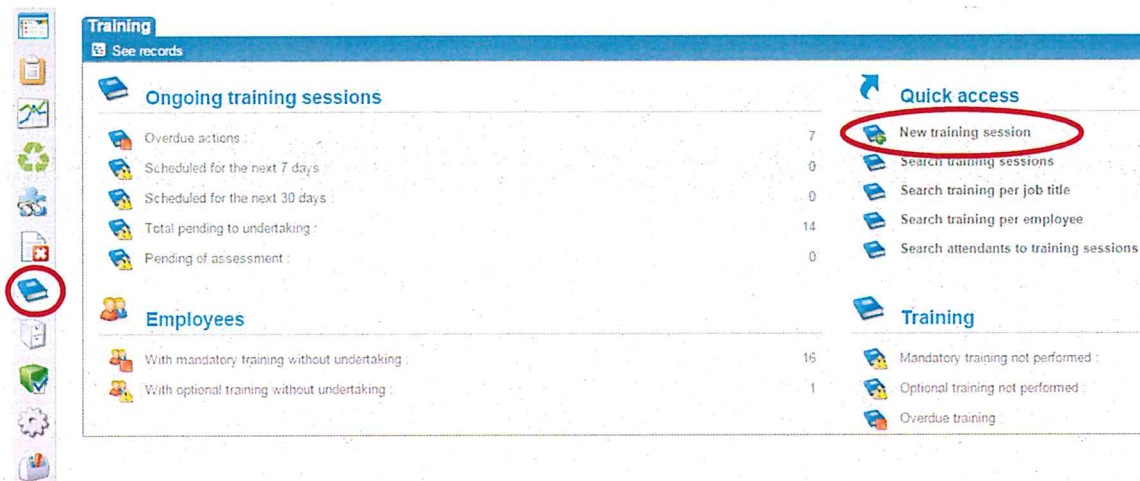
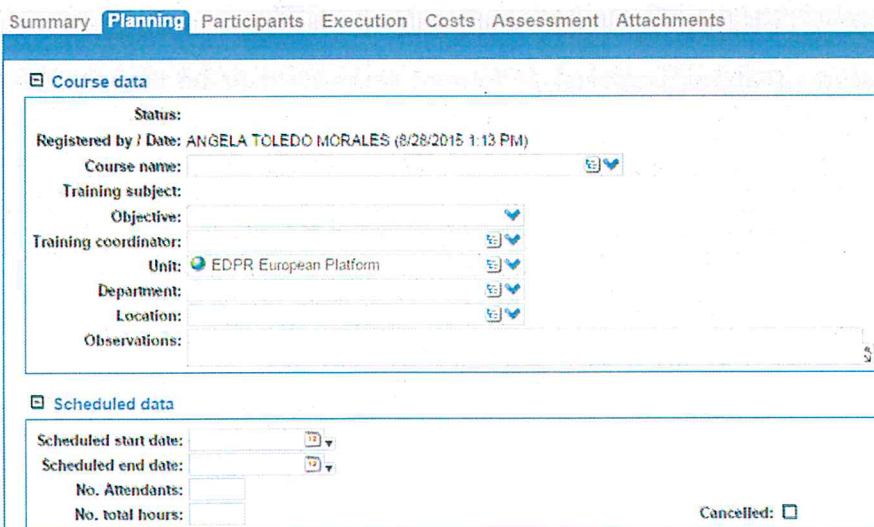
- the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance;
- their roles and responsibilities in achieving conformity with the requirements of the EDPR EMS;
- the potential consequences of departure from specified procedures.

6.4.2.1 Prosafety

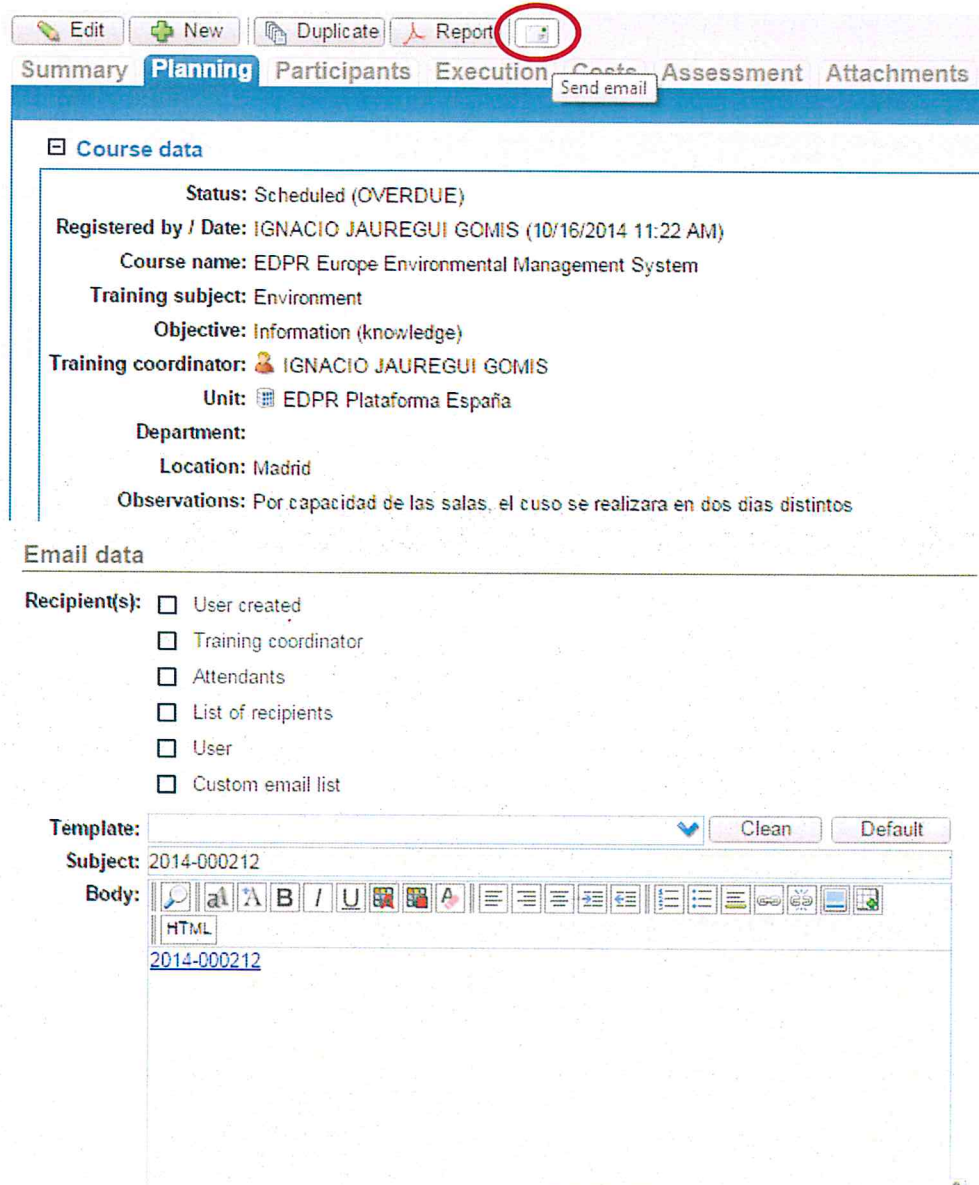
Based on what's established in the general procedure EXPR-EU/EMS-GEN-00004 "Competence, training and awareness", following are some general notes for the business units working with PROSAFETY:

- The EMS Manager identifies the environmental training needs in PROSAFETY through the module "Training Management" instead of using the excel template TMP-EU/EMS-GEN-00003.

Training management > New training session

- The EMS Manager can export the *Identification of training needs* to pdf format, print it and give it to the Country EMS Management Representative for its signature of approval. Once signed, the EMS Manager scans the Program and upload it into PROSAFETY as an attachment.
- The communication of the *environmental training needs* to the trainees involved is made through PROSAFETY which allows sending emails including the PROSAFETY link(s) to the training action(s).



The screenshot shows the EMS Manager interface with the 'Planning' tab selected. The 'Course data' section displays the following information:

- Status: Scheduled (OVERDUE)
- Registered by / Date: IGNACIO JAUREGUI GOMIS (10/16/2014 11:22 AM)
- Course name: EDPR Europe Environmental Management System
- Training subject: Environment
- Objective: Information (knowledge)
- Training coordinator: IGNACIO JAUREGUI GOMIS
- Unit: EDPR Plataforma España
- Department:
- Location: Madrid
- Observations: Por capacidad de las salas, el curso se realizara en dos dias distintos

The 'Email data' section is also visible, showing options for recipients and a template selection. The 'Subject' field is populated with '2014-000212'.

- Contrary to what's established in the general procedure EXPR-EU/EMS-GEN-00004, the business units working with PROSAFETY do not need to send the *Environmental Training Program* to the EDPR EU EMS Manager for the records, since it is accessible through PROSAFETY.

- The EMS Manager monitors the progress in the implementation of the *Environmental Training Program* in PROSAFETY through the module “*Training management*” instead of using the excel template TMP-EU/EMS-GEN-00003.

Training management > Search training

- Choose the training action:

Training management									
Course name	Status	Unit	Scheduled start date	Real start date	Trainer company	No. Attendants	No. scheduled participants	Total hours	
EDPR Europe Environmental Management System	Scheduled	EDPR Plataforma España	3/10/2015				25		
Environmental emergency response (drill included)	Scheduled	EDPR Plataforma España	7/1/2015				18		

- Click on *Edit* and record the progress of implementation of the training action(s) using the *Participants*, *Execution* and *Assessment* tabs:

Summary Planning **Participants** **Execution** Costs **Assessment** Attachments

Outcome data

Organizer company:

Trainer company:

Real start date:

Real end date:

Course duration (hours):

Course duration (days):

No. Attendants:

Observations:

Dedicated hours

Work day hours:

Outside work day hours:

Theoretic hours:

Practice hours:

Total hours:

6.4.3 COMMUNICATION

The activities, processes and services of EDPR EU are included, for internal and external communication, as well as the characteristics of the EMS and the Environmental Policy.

The EDPR EU EMS Management Representative, by means of the EDPR EU EMS Manager, establishes the internal and external communication system (both vertically and horizontally), with regards to the environmental issues.

The process followed by EDPR EU to establish the lines of communication, internal and external, related to environmental aspects and the EMS are defined in the general procedure EXPR-EU/EMS-GEN-00005 “Communication”.

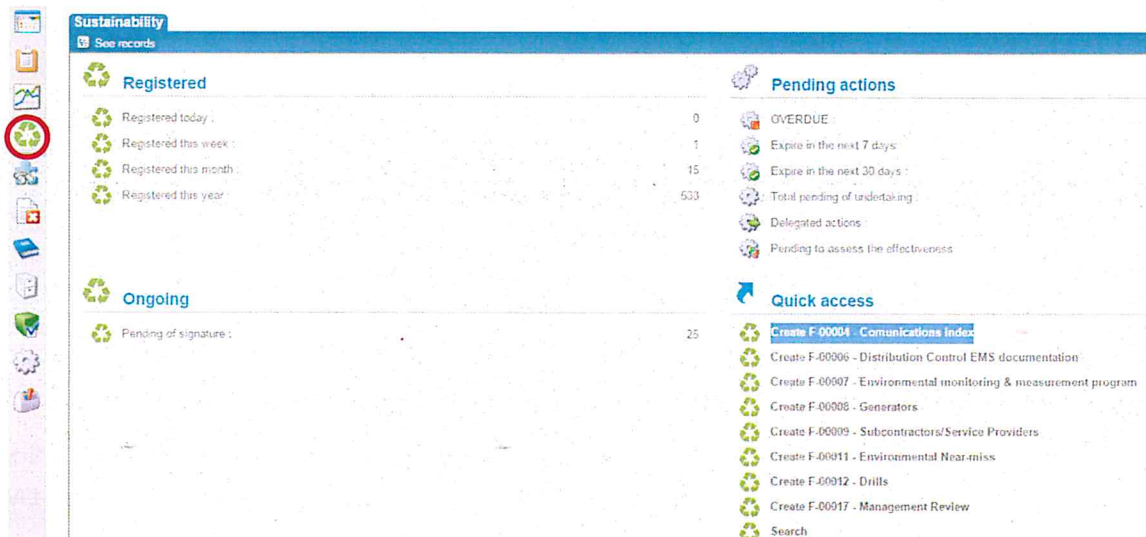
The process to follow for the management of environmental complaints is defined in the general procedure EXPR-EU/EMS-GEN-00012 “Management of environmental complaints”.

6.4.3.1 Prosafety

Based on what’s established in the general procedure EXPR-EU/EMS-GEN-00005 “Communication”, following are some general notes for the business units working with PROSAFETY:

- Communications are registered in PROSAFETY through the module “Sustainability” instead of using the excel template TMP-EU/EMS-GEN-00004.

Sustainability > Create F-00004 - Communications index



The screenshot displays the 'Sustainability' module interface. On the left is a vertical toolbar with various icons. The main content area is divided into several sections:

- Registered:** A table showing registration counts:

Category	Count
Registered today	0
Registered this week	1
Registered this month	15
Registered this year	533
- Ongoing:** A table showing ongoing actions:

Category	Count
Pending of signature	25
- Pending actions:** A list of actions with status icons:
 - OVERDUE
 - Expire in the next 7 days
 - Expire in the next 30 days
 - Total pending of undertaking
 - Delegated actions
 - Pending to assess the effectiveness
- Quick access:** A list of links to create specific forms:
 - Create F-00004 - Communications index
 - Create F-00006 - Distribution Control EMS documentation
 - Create F-00007 - Environmental monitoring & measurement program
 - Create F-00008 - Generators
 - Create F-00009 - Subcontractors/Service Providers
 - Create F-00011 - Environmental Near-miss
 - Create F-00012 - Drills
 - Create F-00017 - Management Review
 - Search

Summary **General** Action plan Attachment

Log data

Registered by / Date: ANGELA TOLEDO MORALES (8/28/2015 1:44 PM)

Type: F-00004 - Communications index

Organization:

Code:

Sent/Received:

Sender:

Addressee:

Date: 8/28/2015

Subject:

Observations:

Responsible:

Responsible signature: Not signed

6.4.4 CONTROL OF DOCUMENTS AND RECORDS

The general procedure EXPR-EU/EMS-GEN-00006 “Control of documents and records” defines the process followed by EDPR EU to develop, approve, distribute, review, store and manage EMS documents and records.

All the EMS documents are consistent with the ISO 14001:2004 standard and with the Environmental Policy.

EDPR EU uses the corporate tool *Internal documentation* to distribute and store the EMS documentation.

6.5 OPERATION

6.5.1 OPERATIONAL PLANNING AND CONTROL

The activities undertaken by EDPR EU, whose environmental aspects have been identified as significant, as well as those that may lead to any deviation from the Environmental Policy or the objectives and targets, shall be carried out in a controlled manner.

With this objective, EDPR EU has defined operational control procedures as part of the EMS, taking into account the facilities included within the scope of this Manual, to ensure that the activities of EDPR EU are controlled as required.

The operational control ensures that all operations carried out by EDPR EU (including suppliers and contractors) are within the channels established by the company.

These procedures shall always be consistent with the Environmental Policy and the approved objectives and targets.

The process followed by EDPR EU to establish the operational control of the facilities regarding environmental matters is defined in the general procedure EXPR-EU/EMS-GEN-00007, "*Operational Control, monitoring and measurement*", as well as in the specific procedures and technical instructions published in each business unit.

The process to follow for the management of equipment with fluorinated greenhouse gases and ozone depleting substances is defined in the general procedure EXPR-EU/EMS-GEN-00013 "*Management of equipment with fluorinated greenhouse gases and ozone depleting substances*".

6.5.2 EMERGENCY PREPAREDNESS AND RESPONSE

EDPR EU has established and keeps up to date a procedure to identify, respond, record, analyze and report environmental near misses, incidents and emergency situations; as well as to take the necessary actions to prevent and/or mitigate them.

The process followed by EDPR EU to establish the near-miss, incidents and emergency action plans of the facilities included in the EMS scope is defined in the general procedure EXPR-EU/EMS-GEN-00008 "*Near-miss and Emergency preparedness and response*".

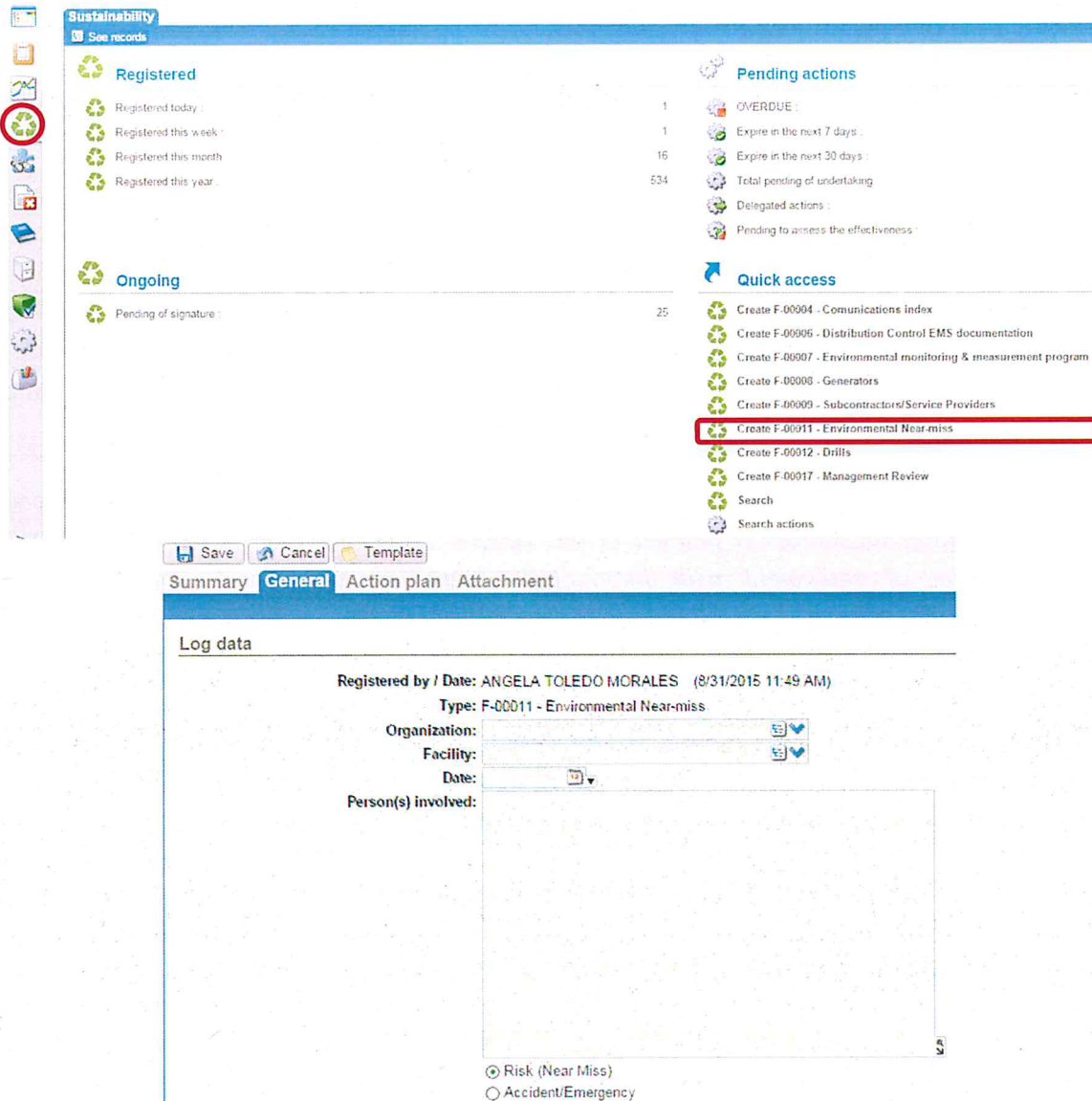
This procedure is verified periodically and, if necessary reviewed, particularly after the occurrence of an incident or emergency situation, in order to verify its effectiveness.

6.5.2.1 Prosafety

Based on what's established in the general procedure EXPR-EU/EMS-GEN-00008 "*Near-miss and Emergency preparedness and response*", following are some general notes for the business units working with PROSAFETY:

- The near-miss, incidents and/or emergencies situations of environmental character shall be registered in PROSAFETY through the module "Sustainability" instead of using the excel template TMP-EU/EMS-GEN-00011.

Sustainability > Create F-00011 – Environmental near miss



The screenshot shows the 'Sustainability' dashboard with a sidebar on the left containing various icons. The main area is divided into sections: 'Registered' (with counts for today, week, month, and year), 'Ongoing' (with a count for pending signature), 'Pending actions' (listing overdue tasks and delegated actions), and 'Quick access' (a list of actions to create, with 'Create F-00011 - Environmental Near-miss' highlighted by a red box). Below the dashboard, a form titled 'Log data' is shown with tabs for 'Summary', 'General', 'Action plan', and 'Attachment'. The 'General' tab is active, displaying fields for 'Registered by / Date', 'Type', 'Organization', 'Facility', 'Date', and 'Person(s) involved'. At the bottom of the form, there are radio buttons for 'Risk (Near Miss)' (selected) and 'Accident/Emergency'.

- Contrary to what's established in the general procedure EXPR-EU/EMS-GEN-00008, the business units working with PROSAFETY do not need to send the *Environmental Near-miss, Incident & Emergency report* to the EDPR EU EMS Manager since it is accessible through PROSAFETY.

6.6 PERFORMANCE EVALUATION

6.6.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

EDPR EU has established the procedure EXPR-EU/EMS-GEN-00007 "*Operational control, monitoring and measurement*", to ensure proper and effective coordination of the control and evaluation of the facilities included in the EMS scope.

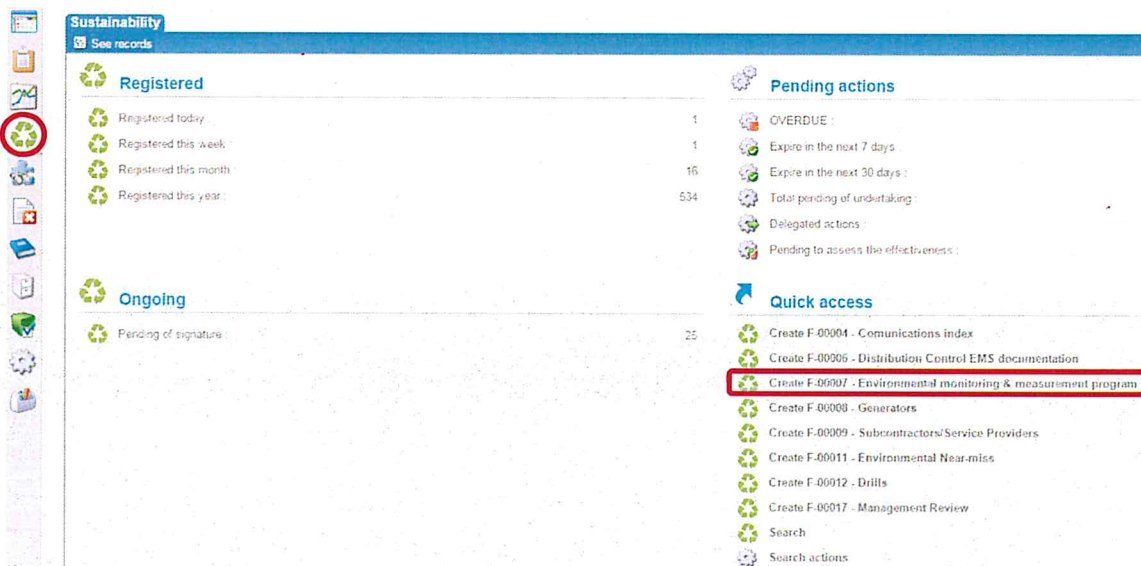
If necessary in any business unit, specific procedures or technical instructions are developed.

6.6.1.1 Prosafety

Based on what's established in the general procedure EXPR-EU/EMS-GEN-00007 "*Operational Control, monitoring and measurement*", following are some general notes for the business units working with PROSAFETY:

- The *environmental monitoring of the facilities* shall be registered in PROSAFETY through the module "Sustainability" instead of using the excel template TMP-EU/EMS-GEN-00007.

Sustainability > Create F-00007 – Environmental monitoring & measurement program



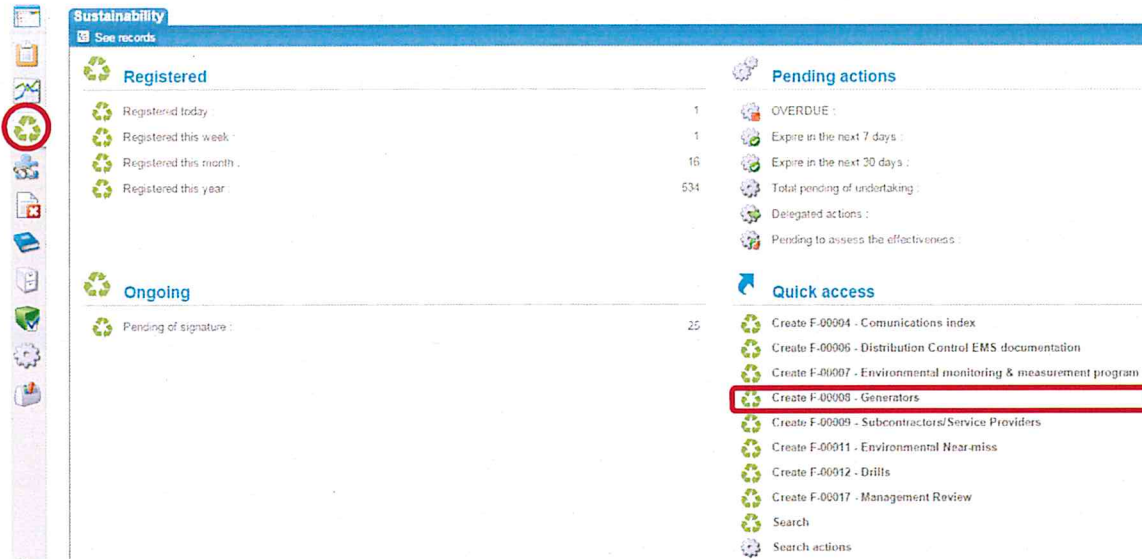
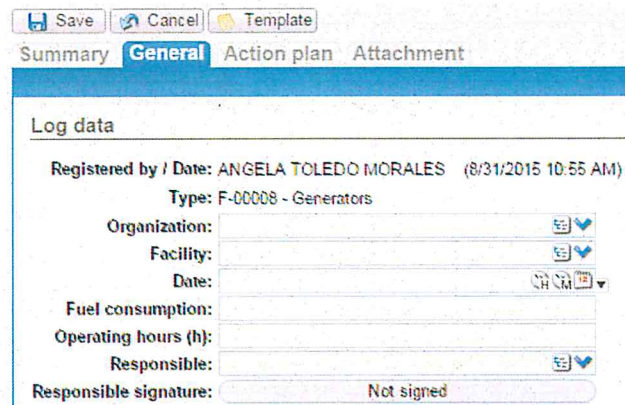
Summary **Checklist data** Check points Action plan Attachment

Log data

Registered by / Date: ANGELA TOLEDO MORALES (8/31/2015 10:51 AM)
Type: F-00007 - Environmental monitoring & measurement program
Organization:
Facility:
Title:
Date / time:
Responsible:
Responsible signature: Not signed

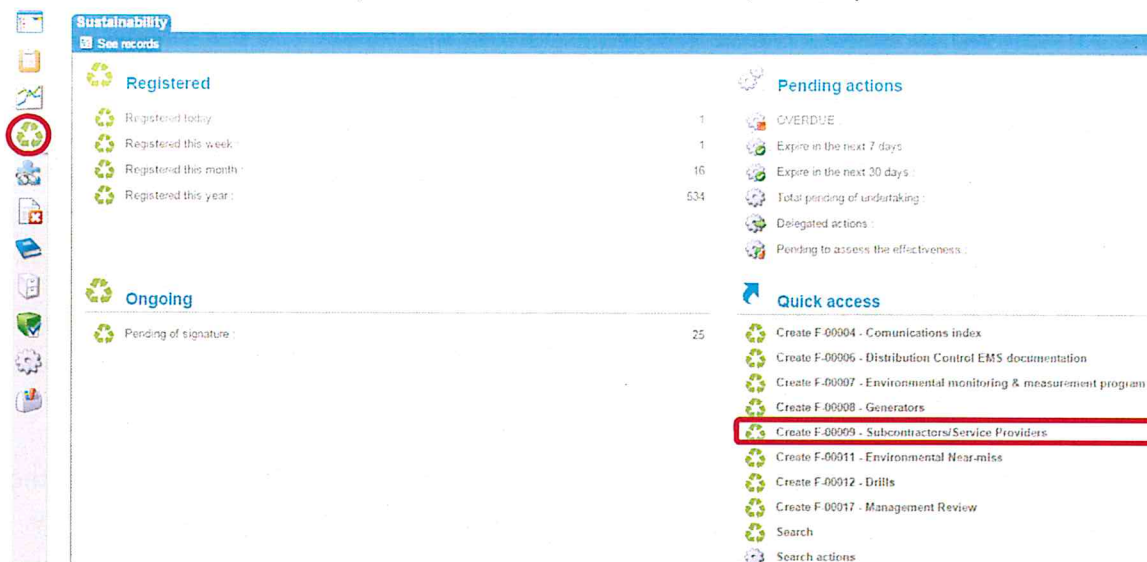
- The data regarding auxiliary generators shall be registered in PROSAFETY through the module “Sustainability” instead of using the excel template TMP-EU/EMS-GEN-00008.

Sustainability > Create F-00008 – Generators

- The *environmental monitoring of contractors* shall be registered in PROSAFETY through the module “Sustainability” instead of using the excel template TMP-EU/EMS-GEN-00009.

Sustainability > Create F-00009 – Contractors/Service providers



Sustainability
See records

Registered

Status	Count
Registered today	1
Registered this week	1
Registered this month	16
Registered this year	534

Ongoing

Status	Count
Pending of signature	25

Pending actions

Status	Count
OVERDUE	1
Expire in the next 7 days	1
Expire in the next 30 days	16
Total pending of undertaking	534
Delegated actions	1
Pending to assess the effectiveness	1

Quick access

- Create F-00004 - Communications index
- Create F-00006 - Distribution Control EMS documentation
- Create F-00007 - Environmental monitoring & measurement program
- Create F-00008 - Generators
- Create F-00009 - Subcontractors/Service Providers**
- Create F-00011 - Environmental Near-miss
- Create F-00012 - Drills
- Create F-00017 - Management Review
- Search
- Search actions

Summary Checklist data Check points Action plan Attachment

Log data

Registered by / Date: ANGELA TOLEDO MORALES (8/31/2015 11:03 AM)

Type: F-00009 - Subcontractors/Service Providers

Organization:

Facility:

Periodic environmental control of:

Responsible:

Responsible signature:

- Contrary to what's established in the general procedure EXPR-EU/EMS-GEN-00007, the business units working with PROSAFETY do not need to send the completed templates to the EDPR EU EMS Manager for the records, since they are accessible through PROSAFETY.

6.6.2 EVALUATION OF COMPLIANCE

In order to carry out the periodic evaluation of the compliance obligations of environmental character, EDPR EU has established and keeps up to date the general procedure EXPR-EU/EMS-GEN-00002 "Identification and assessment of compliance obligations".

This procedure describes the process of identification and assessment of compliance obligations of environmental character applicable to EDPR EU.

The process is supported by SALEM, the corporate tool for the identification and assessment of compliance obligations.

6.6.3 INTERNAL AUDIT

EDPR EU has established a procedure for conducting internal audits of the EMS in order to verify the effectiveness and degree of compliance.

The purpose of these audits is to obtain objective information about the operation of the EMS, allowing the detection and identification of any possible deviations and/or anomalies and to propose the appropriate solutions (corrective actions).

The EDPR EU EMS Manager proposes every year the *Audit Program* for the current year, which shall be coordinated with EMS Managers, validated with the Country EMS Management Representatives and finally approved by the EDPR EU EMS Management Representative.

The *Audit program* includes the scope, the audit criteria, the dates, the objective and the person(s) responsible for conducting the audit, which must not be part of the audited activity.

The internal audits shall be planned so that in the course of a four year cycle, all areas included within the scope of the EMS are subject to an internal audit.

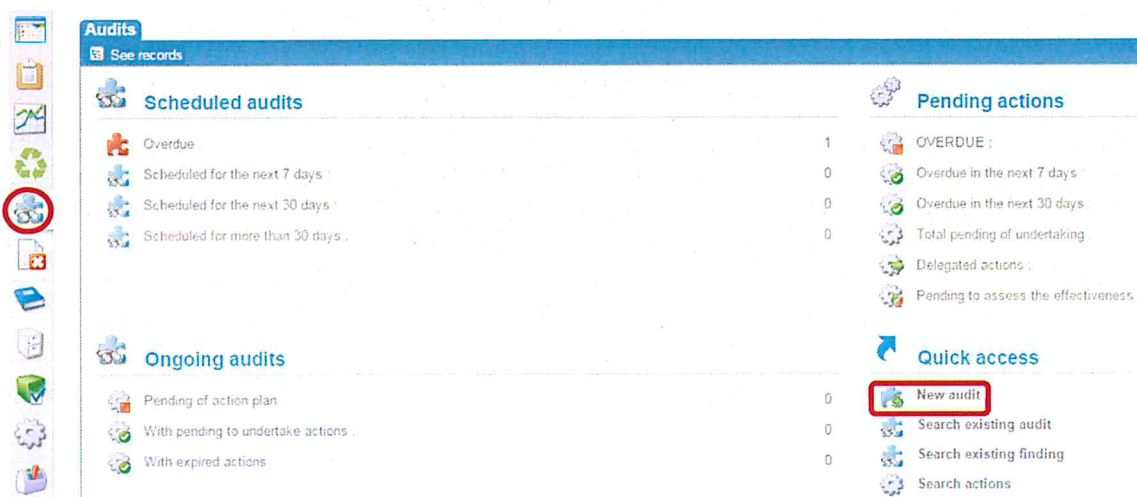
The process followed by EDPR EU for the development, planning, implementation, evaluation and record of the internal audits of the EMS is detailed in the general procedure EXPR-EU/EMS-GEN-00010 "*Internal Audits*".

6.6.3.1 Prosafety

Based on what's established in the general procedure EXPR-EU/EMS-GEN-00010 "*Internal Audits*", following are some general notes regarding the use of PROSAFETY:

- The *Audit Program* shall be registered in PROSAFETY through the module "*Safety audits*" instead of using the excel template TMP-EU/EMS-GEN-00015.

Safety audits > New audit



The screenshot displays the 'Audits' module interface. On the left is a sidebar with various icons, including a gear icon circled in red. The main area is divided into sections: 'Scheduled audits' with a table showing overdue and scheduled counts; 'Ongoing audits' with a table showing pending and expired actions; 'Pending actions' with a list of tasks like 'OVERDUE' and 'Overdue in the next 7 days'; and 'Quick access' with links like 'New audit' (highlighted with a red box), 'Search existing audit', 'Search existing finding', and 'Search actions'.

Summary **General** Result Findings Action plan Closing Attachments

☐ General data

Status: Scheduled

Registered by / Date: ANGELA TOLEDO MORALES (8/31/2015 12:32 PM)

Unit:

Area:

Location:

Expected date/time:

Date undertaken:

Scope


Name:

Type of audit:

Audit topic:

Description:

- The communication of the *Audit Program* to the people involved is made through PROSAFETY which allows sending emails including the PROSAFETY link(s) to the audit(s).


Edit New Report 


Summary **General** Result Findings Action plan Closing Attachments

☐ General data

Status: Closed

Registered by / Date: SILVIA SALINI (5/8/2015 1:02 PM)

Unit:  EDPR Italia

Area:  Environmental

Location: PE Villa Castelli

Expected date/time: 6/22/2015 12:00 AM

Date undertaken: 6/2

Email data

Scope

Recipient(s): ☐ User created
☐ Area responsible
☐ Internal auditor (Not defined)
☐ Participants
☐ List of recipients
☐ User
☐ Custom email list


Name: Ext

Type of audit: Ext

Audit topic: Env

Template: Clean Default

Subject: 2015-000004

Body: 
HTML
2015-000004

☐ Include PDF report of the record

6.7 IMPROVEMENT

6.7.1 NON-CONFORMITIES

EDPR EU has defined the process to identify, record, analyse and monitor non-conformities and other actions for continual improvement, as well as to establish the necessary actions to eliminate the causes of the non-conformities in order that they do not recur or occur elsewhere.

- **Non-conformity:** non-fulfilment of a requirement: legal breaches, deviations from internal requirements (policies, procedures....), repetitive failures in operational control, NCs identified by auditors.
- **Subject to Monitor:** action set whenever a requirement in risk of non-compliance is detected, to prevent a potential future breach.
- **Area of Improvement:** action focused in an aspect not arising from a non-compliance or risk of non-compliance, but which can be improved.

The process is detailed in the general procedure EXPR-EU/EMS-GEN-00009 “*Non-conformities, subjects to monitor and areas for improvement*”.

6.7.1.1 Prosafety

Based on what’s established in the general procedure EXPR-EU/EMS-GEN-00009 “*Non-conformities, subjects to monitor and areas for improvement*”, following are some general notes for the business units working with PROSAFETY:

- Non-conformities, Subjects to monitor and Improvement areas shall be recorded in PROSAFETY through the module “Non-conformities” instead of using the excel template TMP-EU/EMS-GEN-00013.

Non-conformities > New non-conformity



Summary **Preliminary report** Investigation Action plan Closure Attachments

☐ Record data

Status: Open

Documented by / Date: ANGELA TOLEDO MORALES (8/31/2015 1:14 PM)

Problem date:

Unit:

Department:

Location:

Source:

Detected by:

Responsible for the investigation:

Responsible for reviewing and accepting the plan:

Title:

Description:

☐ Classification

Type:

Category:

Nature:

☐ Additions

- The follow-up and evaluation of effectiveness of Non-conformities, Subjects to monitor and Improvement areas shall be recorded in PROSAFETY through the module "Non-conformities" instead of using the excel template TMP-EU/EMS-GEN-00013.

Non-conformities > Search actions

- Choose the action of interest:

Unit	Source	Reference	Description of the action to undertake	Responsible
EDPR Italia	Non-conformities	2015-000017	Verify that the new system of reminders, communication and updating is in force and useful and that the records and action plans are always updated	SILVIA SALINI
EDPR Italia	Non-conformities	2015-000017	It is necessary to speak about complaints among involved departments, in order to open and consolidate a communication channel	MASSIMO GIOE

- Click on *Edit* and use the *Action* tab to record the progress of the action, evaluate its effectiveness and close the action by signing it.

Action	Attachments
<div> <div>Source</div> <div> <p>Created by / date: SILVIA SALINI (5/5/2015 11:44 AM)</p> <p>Unit: EDPR Italia</p> <p>Source: Non-conformities (Environment)</p> <p>Description of the action to undertake:</p> <div>Order and buy a new containment tray and locate it in the clean point.</div> <p>Action type: Preventive</p> </div> </div>	
<div> <div>Fulfilment</div> <div> <p>Responsible: SILVIA SALINI</p> <p>Contractor company:</p> <p>Description of action undertaken:</p> <div> <p>A containment tray has been ordered from Pack Services SRL on 14th of May 2015.</p> <p>The cost is 264,34 euros. It has been paid on 11/06/2015.</p> <p>The containment tray has been located in the clean point the 25/06/2015.</p> </div> <p>Fulfilment signature: Signed SILVIA SALINI (6/26/2015 4:28 PM)</p> </div> </div>	
<div> <div>Delegations</div> </div>	
<div> <div>Postponements</div> </div>	
<div> <div>Assessment of the effectiveness</div> <div> <p>Does the action require assessment?: <input type="radio"/> No <input checked="" type="radio"/> Yes</p> <p>Proposed assessment date: <input type="text" value="12"/></p> <p>Responsible for assessment: <input type="text"/></p> <p>The action is considered: <input type="radio"/> Effective <input type="radio"/> Not effective</p> <p>Assessment:</p> <p>Signature of assessment responsible: Not signed</p> </div> </div>	

- Contrary to what's established in the general procedure EXPR-EU/EMS-GEN-00009, the business units working with PROSAFETY do not need to keep track regularly of the Non-conformities, Subjects to monitor and Areas for improvement in the template TMP-EU/EMS-GEN-00014, since this index is automatically created by PROSAFETY.

6.8 MANAGEMENT REVIEW

The EMS Management Representatives in each business unit reviews the EMS at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

This review includes assessing opportunities for improvement and the identification of the necessary EMS changes, including the Environmental Policy and environmental objectives and targets.

The Management Review includes at least the content established in the general procedure which describes how to conduct it, EXPR-EU/EMS-GEN-00011 *"Management review"*.

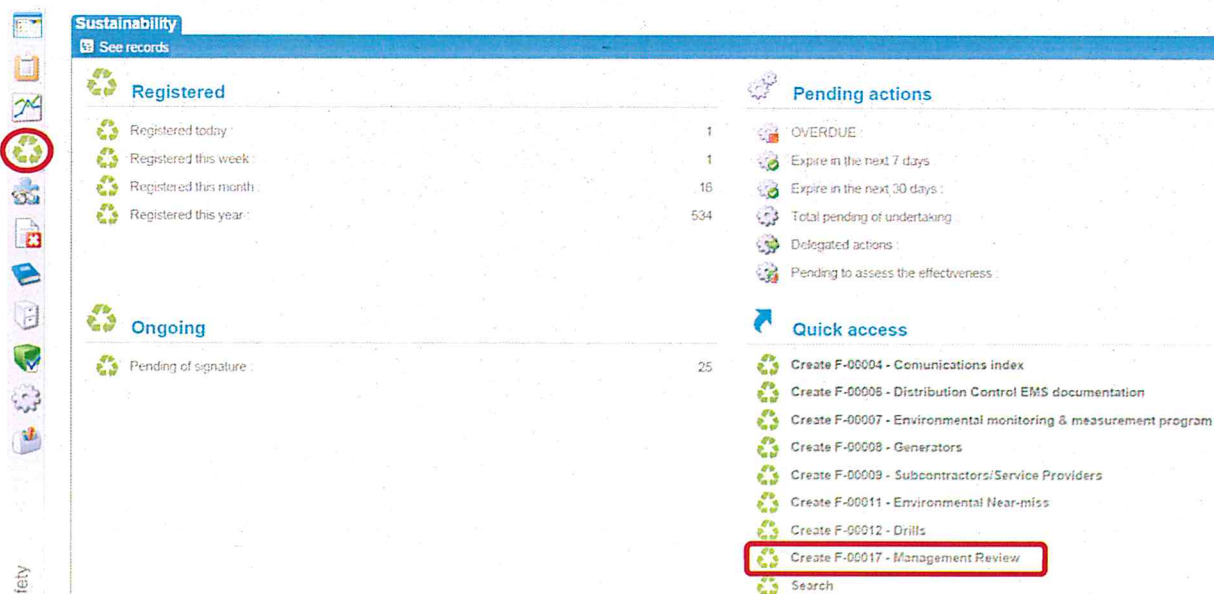
The EDPR EU EMS Management Representative reviews EDPR EU EMS at least once every twelve months based on the inputs from the Management Reviews in each business unit.

6.8.1.1 Prosafety

Based on what's established in the general procedure EXPR-EU/EMS-GEN-00011 *"Management review"*, following are some general notes for the business units working with PROSAFETY:

- The *Minutes of the meeting* of the Management review shall be recorded in PROSAFETY through the module *"Sustainability"* instead of using the excel template TMP-EU/EMS-GEN-00017.

Sustainability > Create F-00017 - Management Review



Sustainability
See records

Registered

Registered today	1
Registered this week	1
Registered this month	16
Registered this year	534

Ongoing

Pending of signature	25
----------------------	----

Pending actions

- OVERDUE
- Expire in the next 7 days
- Expire in the next 30 days
- Total pending of undertaking
- Delegated actions
- Pending to assess the effectiveness

Quick access

- Create F-00004 - Communications index
- Create F-00005 - Distribution Control EMS documentation
- Create F-00007 - Environmental monitoring & measurement program
- Create F-00008 - Generators
- Create F-00009 - Subcontractors/Service Providers
- Create F-00011 - Environmental Near-miss
- Create F-00012 - Drills
- Create F-00017 - Management Review**
- Search


- The *Minutes of the meeting* can be directly recorded in the template available in PROSAFETY:


Summary **General** Action plan Attachment

Log data

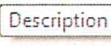
Registered by / Date: ANGELA TOLEDO MORALES (8/31/2015 1:43 PM)


Type: F-00017 - Management Review


Organization: 

Area: 

Attendees:





Description: 

Date: 

Responsible: 

Responsible signature:

- And to include as an attachment the *Minutes of the meeting* and the *Report for the meeting* in pdf format.

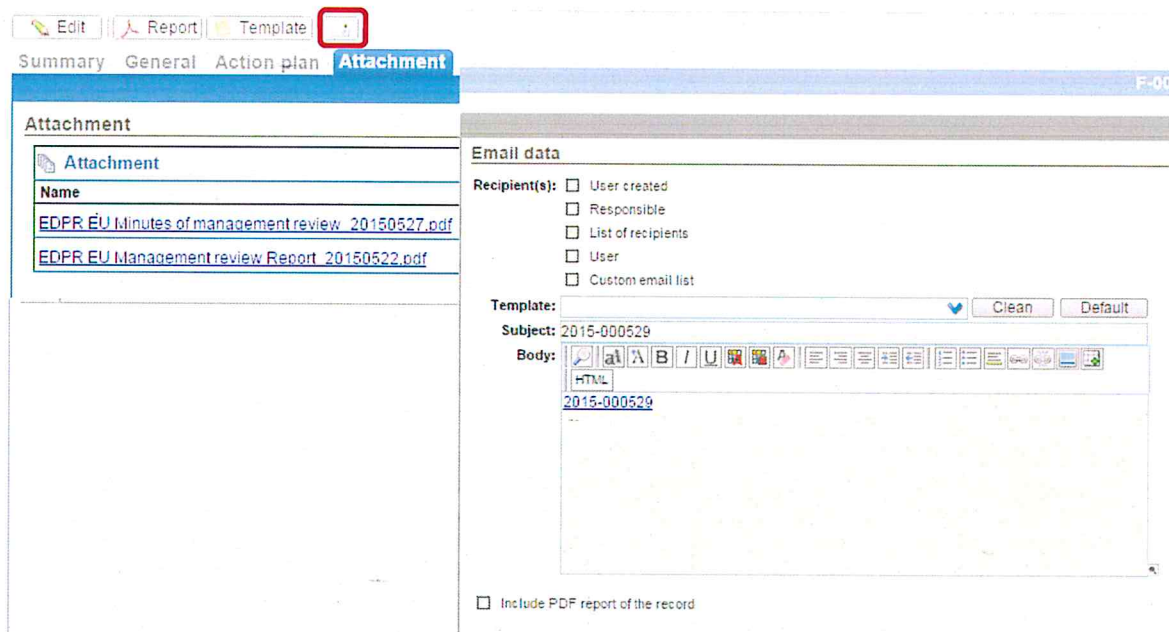
 Edit  Report  Template 

Summary General Action plan **Attachment**

Attachment

Attachment
Name
EDPR EU Minutes of management review 20150527.pdf
EDPR EU Management review Report 20150522.pdf

- The communication of the Management review to the departments involved shall be made through PROSAFETY.



The screenshot displays the 'Attachment' tab in the software interface. The 'Attachment' section on the left lists two files: 'EDPR EU Minutes of management review_20150527.pdf' and 'EDPR EU Management review Report_20150522.pdf'. The 'Email data' section on the right includes a 'Recipient(s)' list with options: 'User created', 'Responsible', 'List of recipients', 'User', and 'Custom email list'. Below this is a 'Template' dropdown menu with 'Clean' and 'Default' buttons. The 'Subject' field is set to '2015-000529'. The 'Body' field is in HTML format and contains the text '2015-000529'. At the bottom, there is a checkbox labeled 'Include PDF report of the record'.

ANNEX I

EDPR EU EMS Organizational chart

ANNEX I

EDPR EU EMS Organizational Chart

