

Appendix 5.1.5

Customer Payment Risk Assessment

WUA MidCo Pty Ltd – WICA Application



Request for Information - Retail Suppliers license for the Kooragang Industrial Water Scheme								
Debtors Risk Assessment								
Risk Description	Inherent Risk			Controls in place	Control effectiveness (1 = Most effective 4 = Least effective)	Residual Risk		
	Impact	Likelihood	Risk rating			Impact	Likelihood	Risk rating
Risk of non-payment by major customers	Low	Possible	Low	SUEZ Australia & New Zealand (SUEZ) has an ongoing Enterprise Risk Management process in place to identify major risks to the business. This includes any risk in relation to debt collection from customers and the impact of any significant non-payment on revenue.	2	Minor	Possible	Low
				SUEZ has an established Accounts Receivable (AR) department with a Business Process Owner (BPO) responsible for collecting the debts and reporting on a regular basis to the Financial Controller and the Chief Financial Officer.				
				The AR BPO has monthly meetings with relevant stakeholders to take any necessary action regarding debt collection. Provision for doubtful debts is made in case of non-payment.				
				Audit, Risk & Compliance team enforces a robust internal control program to ensure the AR processes are designed and operating effectively and any shortcomings are addressed.				
				Internal Audit team carries out an audit of the AR processes every 2 years and any findings and points of improvement are reported to the BPO and Senior Management.				

Note
SUEZ Australia & New Zealand has revenue of \$1.5 billion and non-paym of debts by any single customer will have no material impact on the financial performance of the company.

Impact	% (EBITDA)	Score
Catastrophic	>10%	5
Severe	8% to <10%	4
Significant	6% to <8%	3
Moderate	4% to <6%	2
Low	2% to <4%	1
Minor	<2%	0

High	Extreme	Extreme	Extreme	Extreme	Extreme
Medium	Medium	Extreme	Extreme	Extreme	Extreme
Low	Medium	Medium	Extreme	Extreme	Extreme
Low	Low	Medium	Medium	Medium	Extreme
Low	Low	Low	Low	Medium	Medium
Low	Low	Low	Low	Low	Medium

Score
% Occurrence
Likelihood

0	1	2	3	4	5
<1%	1% to <5%	5% to <20%	20% to <50%	50% to <80%	>80%
Exceptional	Rare	Unlikely	Possible	Probable	Almost Certain

Appendix 5.1.7

SUEZ Business Practices Manual

WUA MidCo Pty Ltd – WICA Application



BUSINESS PRACTICES MANUAL

The information contained in this document is the property of SUEZ Water & Treatment Solutions Australia. It must not be used for commercial or other purposes without prior approval of the Executive Director.

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1. COMPANY BACKGROUND

Degrémont Pty Ltd is fully owned by SUEZ (a company incorporated in France). Degrémont Pty Ltd trades as SUEZ Water & Treatment Solutions (WTS).

SUEZ WTS has been established to provide services in the fields of drinking water, process water, waste water and sludge treatment and disposal.

The activities of SUEZ WTS include the ownership, management, operation, maintenance, repair, replacement, refurbishment, planning, design, construction and financing of water and waste water systems for public bodies as well as industrial and private companies.

SUEZ WTS is a service organisation with two main objectives:

- Operation and maintenance of works which may consist of projects developed by SUEZ WTS or existing assets managed under contract. This phase is under the control of Plant Managers and the work is carried out by SUEZ WTS's employees or contractors.
- Project management of the works delivery phase of a project, which includes financing, planning, design, construction and commissioning of the works. This phase is under the control of a Project Manager and contractors carry out the work.

Supporting the principal activities of SUEZ WTS, special services are provided. These include the provision of technical assistance, consulting services, training services, laboratory services and technical services.

2. SCOPE OF THE BUSINESS PRACTICES MANUAL

This manual describes the policies in place in SUEZ WTS to address the requirements of:

AS/NZS ISO 9001: 2008 - Quality Systems – Quality Management Systems - Requirements.

AS/NZS ISO 14001:2004 - Environmental Management Systems – Requirements with Guidance for Use.

AS/NZS 4801: 2001 - Occupational Health and Safety Management Systems - Specification with Guidance for Use

OHSAS 18001:2007 - Occupational Health and Safety Management Systems - Requirements

The Business Practices Manual addresses each of the elements of these standards and the applicability of each element to the SUEZ WTS's functions. The Business Practices Manual also takes into account legislative requirements associated with Major Hazard Facilities, in particular Prospect WFP.

This Business Practices Manual and the associated management system applies to all activities carried out by SUEZ WTS both in its plants and non-operational sites as follows:

- Rhodes Head Office, including Design and Build projects
- Prospect Water Filtration Plant (PWFP)
- Noosa Waste Water Treatment Plant (NWWTP)
- Perth Seawater Desalination Plant (PSDP)

The SUEZ WTS integrated management system (ISO 9001, ISO 14001, AS/NZS 4801 and OHSAS18001) applies to Prospect WFP, Perth SDP, Noosa WWTP and Sydney Head Office (Rhodes).

3. CONTROL OF THE BUSINESS PRACTICES MANUAL AND PROCEDURES

The Business Practices Manual shall be approved by the Executive Director prior to release. All procedures relating to the SUEZ WTS Management System will be reviewed by nominated representatives prior to release.

An electronic copy of the Business Practices Manual shall be controlled in the online management system (IMS) and allocated to each of the sites covered by the scope. All procedures relating to the SUEZ WTS Management System will be controlled electronically in the online management system. Any hard copy procedures required to be maintained will be specified at the document level in the IMS. All other copies are uncontrolled.

Uncontrolled copies of the manual or the procedures shall not be maintained or updated by the Company.

All amendments to the Business Practices Manual and procedures shall be approved by the Executive Director and the nominated reviewers respectively prior to release. Amendments shall be made by re-issuing the whole document. Amendments shall be recorded in the change synopsis field associated with the controlled document in the online management system (IMS).

The following sections outline the way in which the Company addresses each element of the management system standards. Where appropriate, references are made to more detailed procedures.

4. THIRD PARTY CERTIFICATIONS

It is a SUEZ WTS policy to maintain third party certification of its management systems against ISO 9001:2008, ISO 14001:2004, AS/NZ 4801:2001 and OHSAS18001:2007. All systems are integrated (i.e. a particular procedure may address some requirements of ISO 9001:2008 and some of ISO 14001:2004, AS/NZS 4801:2001 and OHSAS18001:2007). Third party certification to a particular standard will only apply to those parts of SUEZ WTS system that relate to the requirements of that particular standard.

The SUEZ WTS certification process falls under SUEZ WTS Group program managed by the Omega Team (Paris).

4.1. Group Certifications

SUEZ WTS certifications to ISO9001 fall under the Group Certification (SGS/COFRAC) with certificates issued under the Group accreditation by SGS France.

The SUEZ WTS Group ISO9001 certification is based on the Group "Omega" processes.

SUEZ WTS entities that fall under the Group ISO9001 certification include;

- Rhodes Head Office, including Design and Build projects
- Prospect Water Filtration Plant (PWFP)
- Noosa Waste Water Treatment Plant (NWWTP)
- Perth Seawater Desalination Plant (PSDP)
- Hutt Valley Waste Water Treatment Plant (HVWS)

4.2. SUEZ WTS Certifications

While SUEZ WTS ISO 9001 certifications fall under the Group certification process, certificates are also issued by SGS Australia (JAZ-ANZ)

Certifications to ISO 14001, OHSAS 18001 and AS/NZS 4801 are issued by SGS (JAZ-ANZ) NB: SUEZ WTS Group is not certified to ISO 14001 or OHSAS 18001

4.3. Audit Frequency

External SGS audits for the sites nominated in Section 4.1 (above) are based on a sampling frequency agreed by SGS Paris and SUEZ WTS Group and take into account client requirements as follows:

- | | |
|---|--------------------|
| • Rhodes Head Office, including Design and Build projects | Annually |
| • Prospect Water Filtration Plant (PWFP) | Annually |
| • Perth Seawater Desalination Plant (PSDP) | Once every 2 years |
| • Noosa Waste Water Treatment Plant (NWWTP) | Once every 3 years |
| • Hutt Valley Waste Water Treatment Plant (HVWS) | Once every 3 years |

5. MANAGEMENT RESPONSIBILITY AND LEADERSHIP

SUEZ WTS's management is committed to and actively supports the establishment of management systems the company subscribes to.

SUEZ WTS's management is committed to:

- Formulating and encouraging the adherence to policies within the organisation,
- Leading through changes and assessing the risks and necessary adjustments associated with change,
- Exhibiting a personal and visible commitment to the values of SUEZ WTS,
- The sharing of company's vision, mission and values by all stakeholders,
- Communicating clearly and effectively both within the organisation and with all stakeholders,
- Involving all functions and all employees in continual improvement, and the delivery of increasing value to stakeholders,

- Structuring and operating the organisation in a way that will enable the achievement of SUEZ WTS's objectives,
- Providing appropriate resources in terms of human resources, finances, equipment and support,
- Encouraging employees to participate in the improvement of the organisation and rewarding performance,
- Basing their decisions on data and on the results of analysis, monitoring or audits,
- Reviewing the management systems to assess its continuing suitability in meeting the objectives of the organisation, including compliance with the SUEZ WTS Group Omega Processes,
- Recognising community and other stakeholders concerns and, when appropriate, considering them in setting business policies and objectives.

6. IDENTIFICATION AND ANALYSIS OF NEEDS

6.1. Interested parties

The needs and expectations of third parties who have interest in SUEZ WTS's activities such as employees, clients, shareholders, suppliers, the community and the government are genuinely considered when formulating policies and business objectives and when carrying out activities.

Protection of the environment and the safety of employees and visitors are of prime importance for SUEZ WTS. It has set policies and management systems to cater for these concerns.

Procedures have been established dealing with communication with interested parties, compliance with laws and regulations, review of customers' needs and expectations.

Feedback from interested parties provides an input into business directions.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

6.2. Clients

Clients play the central role in the definition of standard of service. Client's needs and expectations are established through market research managed by the marketing and business development functions within the organisation.

Communications channels such as conferences, formal and informal meetings, operational communications are used to determine or review clients' needs.

Answers to business enquiries and the review of contracts are used as a way to assess clients' needs and expectations. Business enquiries and contracts are reviewed to ensure that client's requirements can be fully met.

Clients' feedback is sought at every opportunity and during tender debriefing sessions.

Bidding phase:

General enquiries from current or potential clients regarding the services, which can be provided by SUEZ WTS, shall be directed to the Executive Director. Such enquiries may be in the form of formal requests for tender, expressions of interest or informal requests. The Executive Director shall appoint a member of the management team to manage the response to such enquiries.

The Executive Director or his delegate shall ensure that all requirements are adequately defined and documented and responses to enquiries adequately address all technical, commercial, legal, regulatory and quality requirements and that they are reviewed and approved prior to issue by the Board of SUEZ when required by the Shareholders' Agreement.

Contract negotiation and review phase:

Contracts shall be reviewed on an iterative basis to ensure Degremonet has the capability to meet the contractual requirements and that they accurately reflect the tender or offer, as well as any subsequent negotiations with the client. Any discrepancies shall be formally reported to the client, and coordinated action shall be taken to have them resolved.

Environmental and WHS/OH&S issues shall form a part of the review process. The requirements of the client and various authorities shall be understood and reviewed. The impact of the operations on legal and regulatory obligations and compliance shall be assessed as well as the actions to be taken to control or mitigate these

impacts. The cost of controlling or mitigating these impacts in normal and abnormal conditions shall also be reviewed.

In the case of contracts involving the taking over of existing facilities, a review of the condition of existing facilities and present and past compliance with environmental and WHS/OH&S obligations shall be carried out. Risks associated with the taking over of poorly performing facilities shall be assessed and, when relevant, the cost associated with the refurbishment of the facility shall be negotiated with the client.

Records of contract reviews shall be maintained.

Amendments to existing contracts:

Contract amendments shall be reviewed and implemented in order to accurately reflect clients' requirements. Responsible staff shall ensure that contract amendments are correctly transferred to all functions within the company in accordance with procedures or Project Plans.

Referenced Elements in Standards:

ISO 9001:2008: 7.2, 5.2

ISO 14001:2004: 4.4.3

AS/NZS 4801:2001: 4.4.3

OHSAS 18001:2007: 4.4.3

6.3. Employees

The expectations of employees are considered as a way to achieving company's objectives by fostering an environment of motivation, recognition of performance and support.

Degrémont has developed a formal process of induction and training as a way of promoting skill development, career opportunities and personal growth. Training needs correlate to business objectives.

Employees' involvement is actively encouraged when developing business initiatives, business plans, procedures and for the detection of business improvements in various areas of the organisation (e.g.: operations, safety, and environment).

Employees' performance is evaluated and rewarded by a formal system of recognition and reward.

Further information is detailed in Section 9.2 Human Resource Management

Referenced Elements in Standards:

ISO 9001:2008: 6.2.2

ISO 14001:2004: 4.4.2

AS/NZS 4801:2007: 4.4.2

OHSAS 18001:2007: 4.4.2

6.4. Shareholders

Shareholders have expressed clear directions for the organisation and clear level of performance in areas such as operations, finance, return on investment, WHS/OH&S and environmental performance and exposure to risks.

The interests of shareholders are considered when setting business objectives and when committing the organisation in contractual agreements.

Shareholders shall consistently and genuinely provide support to the organisation in meeting the agreed objectives.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

SUEZ WTS staff seconded to any Projects will work within the business management systems and be subject to the WHS/OH&S requirements of that Project. The Project management system will be selected by the Project partners on a best for project basis.

6.5. Suppliers

SUEZ WTS's suppliers play an important role in ensuring clients' satisfaction. There is a formal process of communication with suppliers whose goods or services could affect SUEZ WTS's ability to supply the required quality of service to its clients or impact on SUEZ WTS's WHS/OH&S or environmental performance.

SUEZ WTS policies, procedures and expectations on quality, safety and environment are clearly communicated to suppliers through purchase agreements, site inductions and requests for information.

Suppliers' performance in these areas is regularly assessed and only those suppliers whose performance is aligned with SUEZ WTS policies and objectives are retained.

Referenced Elements in Standards:

ISO 9001:2008: 7.4

ISO 14001:2004: 4.4.3

6.6. Community

SUEZ WTS has integrated consideration for the community's changing expectations and needs in the review of its policies and management systems.

Members of the Community are given access to relevant information on SUEZ WTS operations on issues that may affect community safety and the environment. SUEZ WTS management programs, objectives and performance are communicated to relevant parties.

A community relations program has been developed to foster a relationship of open communication and trust between the organisation and the community.

SUEZ WTS has set compliance with international management systems standards as an additional sign of care for the community and implementation of due diligence.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

6.7. Government

SUEZ WTS has established a formal system to ensure compliance with government expectations as expressed in legislation, regulations and relevant authority guidelines

The need for access to legal and other reference documentation as a mean of ensuring compliance with legal and other obligations has been identified.

Relevant acts, associated regulations, standards, guidelines and codes of practices are maintained where they are needed. There is a formal process for the review and communication of changes to legislation to relevant parties through the organisation.

Qualified experts conduct audits of SUEZ WTS legal obligations on environmental and WHS/OH&S matters periodically and advise SUEZ WTS management on obligations the organisation has to comply with.

Compliance audits on environmental and WHS/OH&S matters are conducted each year as part of the surveillance audit to verify compliance of SUEZ WTS activities with its legal and regulatory obligations. Areas of non-compliance or improvements are identified and acted upon.

Deficiencies or improvement opportunities are formally and promptly followed up by management through the establishment of action plans or management programs.

Referenced Elements in Standards:

ISO 14001:2004: 4.3.2 – 4.5.1

AS/NZS 4801: 2007: 4.3.2

OHSAS 18001:2007: 4.3.2

6.8. Initial Situation

As soon as the decision is made to implement an ISO 14001, AS/NZS 4801 or OHSAS 18001 management system at any site, an initial review shall be conducted to establish the relationship between plants' activities and environmental or safety issues.

The initial review shall include the identification of environmental aspects or safety hazards to determine those which have a significant impact,

The identification of all legislative and regulatory requirements applicable to the plant, including the legislative requirements associated with Major Hazard Facilities,

The evaluation of existing practices and procedures,

The investigation of previous incidents of non-compliance,

The view of interested parties.

Following the initial review, SUEZ WTS shall identify the significant environmental aspects or the significant safety risks of its activities, product and services that it can control and over which it can be expected to have an influence.

An extensive register of environmental aspects or safety risks shall be generated through site inspections, interviews with staff, review of site documentation, incident reports, brainstorming sessions with staff, internal and external audits.

The significance of these aspects shall be evaluated and prioritised in a consistent and systematic manner. The significance shall be determined through a rating system, which shall take into account the frequency and likelihood of the event as well as legal compliance issues.

A formal review of the significant aspects shall be performed on a yearly basis or more often if necessary, to ensure that the organisation always focuses on those environmental impacts or safety hazards, which present higher risks.

Further information is detailed in section 11 Process and Activity Management

Referenced Elements in Standards:

ISO 14001:2004: 4.3.1 – 4.3.2

AS/NZS 4801:2001 4.3.1 – 4.3.2

OHS18001AS:2007: 4.3.1 – 4.3.2

7. POLICY AND OBJECTIVES

7.1. Policy

SUEZ WTS Policies are the foundation of the management systems the organisation subscribes to.

Policies form a statement of SUEZ WTS commitment to establishing management systems to relevant standards as a means of achieving organisational objectives in relation to quality of the product or service delivered to clients, in relation to protecting the environment or the health of its employees and contractors.

To this end, SUEZ WTS's management has formulated and implements the following main policies:

- Quality Policy that reflect SUEZ WTS commitment to the principles embodied in AS/NZS ISO 9001
- Environmental Policy that reflects SUEZ WTS commitment to the principles embodied in AS/NZS ISO 14001
- Occupational Health and Safety Policy that reflects SUEZ WTS commitment to the principles embodied in the AS/NZS 4801 and OHSAS18001 standards and the requirements associated with Major Hazardous Facilities

Policies are signed by the Executive Director, communicated to all employees and displayed on SUEZ WTS sites.

Policies provide directions to all employees to enable them to perform their duties in accordance with SUEZ WTS objectives and require their full commitment.

Site specific objectives and targets shall be determined following the review of significant aspect. They shall be aligned with SUEZ WTS corporate policies.

Referenced Elements in Standards:

ISO 9001:2008: 5.1, 5.3, 5.4.1

ISO 14001:2004: 4.2

AS/NZS 4801:2001 4.2

OHSAS 18001:2007: 4.2

7.2. Objectives and Targets

Objectives and targets shall be developed for each plant where an ISO 14001, AS/NZS 4801 or OHSAS 18001 system has been implemented based on a review and evaluation of the site Significant Environmental Aspects and Significant WHS/OH&S Risks.

Objectives and targets shall be aligned and consistent with SUEZ WTS's strategic objectives and policies and the annual BU objectives.

At least one objective shall be determined for each Significant Environmental Aspects and Significant WHS/OH&S Risks. Objectives and targets are meaningful, quantifiable, timeframe with responsibilities assigned for their achievement and monitoring.

Objectives and targets shall be communicated and reported internally and externally to relevant parties. Progress towards objectives and targets shall be evaluated by objectively measuring and evaluating key performance indicators.

Objectives and targets are reviewed regularly and revised when circumstances change such as change in law, changes in process or community perceptions.

Referenced Elements in Standards:

ISO 14001:2004: 4.3.3

AS/NZS 4801:2001: 4.3.3

OHSAS 18001:2007: 4.3.3

8. SYSTEM PLANNING AND IMPLEMENTATION

8.1. Structure and Organisation

SUEZ WTS management has a process by which company strategic directions are determined with the involvement of employees.

The company's Mission and Vision have been translated into clear business objectives, targets and actions plans for implementation at all levels within the organisation.

The Business Planning process involves the consideration of;

- clients requirements in relation to contractual performance and quality of service,
- shareholders requirements with regards to business expansion, profitability and reputation,
- human resources issues which include motivation, communication, performance acknowledgment, career development and safety,
- Interested parties and community interests in relation to protection of the environment.

The deployment of these strategies throughout the organisation rests with the top management as well as the coordination of all initiatives within a global approach.

The establishment and continual development of management systems form a part of the organisation strategy to achieve customer and community satisfaction and business development.

SUEZ WTS's management is responsible for ensuring that management systems are established, implemented and maintained. Regular reviews are established to review the structure, development and level of implementation of the management systems.

The roles and responsibilities of all personnel whose work may impact on quality, safety or the environment are documented either in their job descriptions or in procedures.

Management Representatives have been nominated at a company and site level who report on the implementation and effectiveness of the management systems.

Referenced Elements in Standards:

ISO 9001:2008: 4.2.2, 4.1

ISO 14001:2004: 4.4.1

AS/NZS 4801:2001: 4.4.1

OHSAS 18001:2007: 4.4.1

8.2. Management of Program to Meet Organisational Objectives and Targets

Management Programs are established to document strategies for the achievement of the environmental and WHS/OH&S objectives and targets.

Management programs shall be a compilation of all activities directed towards:

- The achievement of objectives and targets,
- The management and mitigation of Significant Environmental Aspects or Significant WHS/OH&S Risks,
- Complying with all applicable regulatory requirements, and
- Meeting the requirements of the Environmental Policy or WHS/OH&S Policy.

Management Programs shall contain details of resources both in term of budget and human resources, responsibilities, monitoring, time frames, training and additional procedures to be developed. Management programs are approved at relevant levels within the organisation and reviewed at least on a yearly basis.

Referenced Elements in Standards:

ISO 14001:2004: 4.3.4

AS/NZS 4801: 2001: 4.3.4

OHSAS 18001:2007:

8.3. Management Systems Documentation

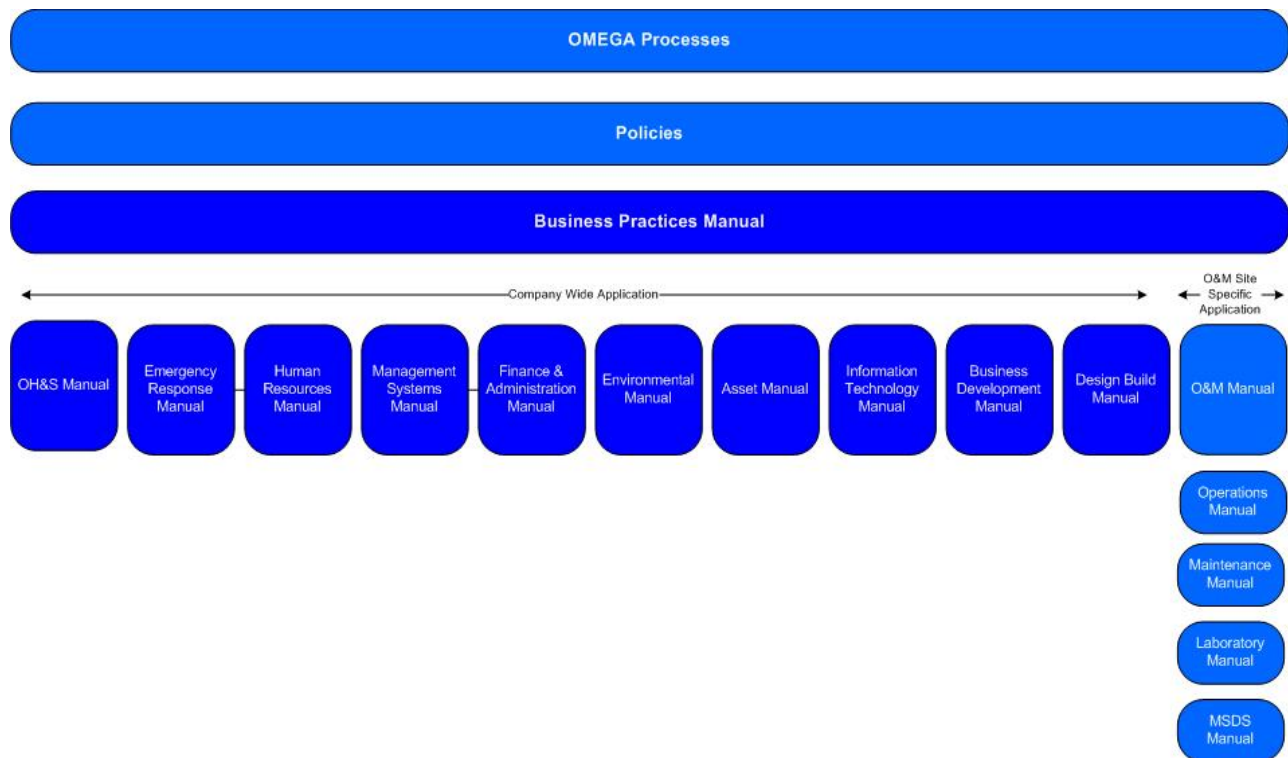
Degrémont has documented and maintains a documented and integrated online management system which complies with the requirements of the ISO9001, ISO14001, AS/NZS4801 and OHSAS18001 standards, the legislative requirements in the various states of operation and the SUEZ WTS Group Omega Processes. The system comprises the following documents:

- **SUEZ WTS Group Omega Processes** which define the higher level group policies, processes and associated procedures.
- **SUEZ WTS Policies** which define the higher level Safety, Quality and Environmental policies
- **Business Practices Manual** (this document) which defines what activities are carried out to meet the requirements of the management standards,
- **SUEZ WTS Procedures and Forms Manuals** which detail how each activity is carried out and what records are maintained.
- **Site Specific Procedures and Forms Manuals**, which detail how activities specific to each plant are carried out and what records are maintained. Typically this comprises operations and maintenance procedures, and laboratory manual.
- **Project Plans**, which define the particulars of how the delivery of specific project is controlled.
- These plans are to be used in conjunction with the company procedures.
- **Records** which capture the results and verify that the activities and actions were carried out.

Company procedures are developed when:

- Required for the achievement of quality,
- Required under contractual, legal or regulatory obligations,
- Their absence could lead to deviations from environmental and safety objectives and targets,
- Required for the effective implementation of the management systems, including compliance with the Group Omega processes.

Company procedures include procedures developed by SUEZ WTS or by the broader SUEZ WTS Group (Omega processes)



Referenced Elements in Standards:

ISO 9001:2008: 4.1, 4.2.1, 4.2.2

ISO 14001:2004: 4.4.4 – 4.4.6

AS/NZS 4801:2001: 4.4.4

OHSAS 18001:2007: 4.4.4

8.4. Roles and Responsibilities

The organisation chart showing functional relationships is shown thereafter (Section 8.6.8).

The Human Resources Manager maintains detailed and up-to-date organisation structures showing roles, reporting lines and the assignment of projects and activities to particular employees.

The following are brief summaries of key personnel's responsibilities and authorities. Guidance is given in procedure SYS-001 WHS/OH&S and Environmental Responsibilities and Accountabilities.

Executive Director (WTS)

The Executive Director has overall responsibility for the WTS business line within the Australian BU and reports to the Chief Executive Officer for the BU.

The Executive Director is responsible for:

- determining company policies;
- strategic planning of all company activities;
- ensuring that investment returns meet shareholders' expectations;
- developing new business;
- ensuring that all staff operate to and comply with defined policies and procedures;
- representing the company on national and international professional organisations;
- directing the activities of the HSEQ Manager;
- approving the company Business Practices Manual and company Procedures and audit schedules; and
- reporting to the SUEZ BU executive on Quality Assurance issues.

The Executive Director is ultimately accountable for all aspects of compliance with WHS/OH&S and environmental laws and regulation and for providing leadership, support and resources for the achievement of company's objectives in these areas.

The Executive Director is responsible for the health and safety of all staff and for ensuring that all operations are carried out in an environmentally sound manner.

HR Manager

The Human Resources Manager reports to the BU Human Resources Director and is responsible for managing all facets of the human resources portfolio within WTS in accordance with the group policies and Australian employment laws.

The HR Manager is responsible for developing and maintaining policies in relation to all human resources matters including recruitment, training and development, health and safety, remuneration and reward and organizational development and ensuring that SUEZ WTS provides a safe, fair and attractive working environment for its staff.

The HR Manager must maintain knowledge of all industrial relations legislation and ensuring that SUEZ WTS complies with all relevant legislation and that our policies and procedures are consistent with those legislative requirements.

General Manager Business Development

The General Manager Business Development reports to the Executive Director and is responsible for all aspects of developing SUEZ WTSs business from strategic planning, market analysis, development and management of project pipeline and customer relationship management throughout the project life-cycle from initial contact, through bid preparation, project delivery and into and including operations.

The General Manager Business Development is responsible for ensuring that projects proceeding through to bid stage in compliance with Degrémont's development procedures and that a clear Value Proposition is agreed with the bid team in line with the Clients key strategic drivers for the Project. Prior to bid submission the General Manager Business Development will review the offer to ensure the Value Proposition is clearly reflected in the offer documents.

The General Manager Business Development is responsible for managing WHS/OH&S and environment requirements on relevant projects and ensuring WHS/OH&S and environment requirements from calls for EOI or Tenders are reflected in SUEZ WTS offers and ultimately meet and exceed Client expectations.

Proposals Manager

The Proposals Manager reports to the E is responsible to the Executive Director for selecting new opportunities, preparing offers in partnership with third parties and negotiating final contracts in accordance with the business target that he has been given in terms of risk assessment, scope of works, time and budget.

The Proposals Manager is responsible for managing WHS/OH&S and environment requirements on relevant projects and ensuring WHS/OH&S and environment requirements from calls for Tenders are reflected in SUEZ WTS offers and ultimately meet and exceed Client expectations.

Bid Managers / Proposal Engineers

Bid Managers and Proposals Engineers report to the Proposals Manager and are responsible for preparing formal responses to invitations to tender and for ensuring successful bidding under acceptable terms and conditions.

Bid Managers and Proposal Engineers are responsible for managing the relationships with all stakeholders (partners, advisers, contractors, potential client), reviewing and negotiating contracts with contractors and/or client, identifying the risks sitting with the project and working out the risk allocation between the parties.

Bid Managers and Proposal Engineers are responsible for identifying quality assurance, WHS/OH&S and environmental issues arising from the call for tenders, for coordinating the assessment of these issues by personnel with relevant expertise and for preparing the offer accordingly. They ensure that the major WHS/OH&S and environment issues which could impact the layout of the plant are correctly assessed (chemicals including chlorine, ATEX, confined zone, electricity hazard, access, personal protection equipment, ...) and priced accordingly.

Operations General Manager (East and West)

The Operations General Managers report to the Executive Director and is responsible for the satisfactory operation of all SUEZ WTS operating facilities, for ensuring that appropriate operating standards and procedures are set and implemented; ensuring facilities operate in accordance with contractual requirements within the

budgetary requirements, for compliance with WHS/OH&S and environmental laws and regulations and for approving and supporting WHS/OH&S and Environmental Management Programs.

The Operations General Managers are also responsible for the upgrade of existing plants, for providing technical assistance to SUEZ WTS team and for research and development projects.

Design Build General Manager

The Design Build General Manager reports to the Executive Director and is responsible for the delivery of all projects according to strict deadlines and budget guidelines. This includes integrating all phases of the project from feasibility to handover.

The Design Build General Manager is required to promote Degrémont safety standards, comply with all state and federal legislation relating to WHS/OH&S and the protection of the environment. The Design Build General Manager is also responsible for ensuring WHS/OH&S and environmental requirements are reflected in the entire engineering design of projects.

Finance & Administration Manager

The Finance & Administration Manager reports to the BU Financial Controller and is responsible for preparing and controlling the budget, preparing tax returns, dealing with bankers and financiers, establishing appropriate accounting and administration procedures and providing accounting reports.

Plant Managers

The Plant Managers report to their respective Operations General Manager's and are responsible for the efficient and compliant operation of a particular plant, which include responsibilities for the operation and maintenance of the plant.

Plant Managers are also responsible for the development of appropriate procedures and training, supervision of plant personnel, day to day compliance with WHS/OH&S and environmental laws and regulations and for implementation of the Management Programs.

Plant Managers are responsible for ensuring that budgets are appropriate for the proper management of WHS/OH&S and environmental issues on their sites.

Project Managers

Project Managers are responsible for ensuring the delivery of specific projects in accordance with contractual, safety and environmental requirements, on time and to budget, and in accordance with the standards for the execution of the works required by Degrémont and the client.

HSEQ Manager

The HSEQ Systems Manager (or Systems Manager) is responsible to the Executive Director for the implementation and administration of the quality, WHS/OH&S and environment management systems and for reporting effectiveness and implementation of the systems.

The Systems Manager is responsible for organising management system reviews; providing management systems input to bids; auditing internally and coordinating the non-conformance system; liaising with clients and contractors on management system matters and ensuring Degrémont maintains third party certification of its management systems.

The Systems Manager is also the company Management Representative within the understanding of AS/NZS ISO 9001: 2008, AS/NZS ISO 14001:2004, AS/NZS 4801: 2001 and OHSAS 18001:2007.

8.5. Background

SUEZ WTS employs an online integrated management system (IMS) that is configured for each of the operational sites, including Rhodes Head Office. The online management system is interfaced with the email system to enable online reviewing and approving of documents, with email notification groups assigned to documents to notify employees when new versions of documents have been approved.

8.6. System Management

The management of company systems is as follows:

8.6.1. Overall Responsibility for Systems Management

The Systems Manager (or HSEQ Systems Manager) will remain with overall responsibility for the WTS management systems including monitoring system performance, monitoring statutory compliance, maintaining

certification to standards, BU interface and reporting. Additional responsibilities in relation to the management system include the following:

- WTS Safety Coordinator (Group) requirement)
- WTS Environmental Officer (Group) requirement)

8.6.2. Responsible for Business Manual Documents

Each of the business manuals contains a suite of documents with each document having an assigned author, reviewer(s), approver, review frequency and notification group (as applicable).

Generally, the author of the document is the subject expert or is responsible for the document content, including compliance with applicable legislation, codes of practice, standards and Group Omega requirements, with functional area management representatives assigned to review the document before the document is released as an authorised version by the document approver. NB: Minor changes to documents, e.g. correction of typographical errors, etc., will not require the document to go through the formal review and approval process, with the author having the option of submitting the document to the assigned systems coordinator (approver) for release as an authorised version.

Document authors are responsible for coordinating amendments to assigned documents, including consultation across the company with personnel impacted by the change, including sub-contractors where appropriate.

All proposed changes are to be made in consultation with the Systems Manager to ensure that the impacts of changes across the management system are considered and that the integrity of certification to the standards is not compromised.

While document authors are assigned responsibility for the various procedures, functional managers have responsibility for ensuring the documentation is maintained as follows;

	Manual	Responsible Person
01.	Business Practices Manual	Systems Manager
02.	Safety Manual (OHS procedures)	Systems Manager
03.	Emergency Response Manual (ER, IMP procedures)	Systems Manager
04.	Human Resources Manual (HR procedures)	Human Resources Manager
05.	Management Systems Manual (SYS procedures)	Systems Manager
06.	Finance & Administration Manual (F&A procedures)	(shared)
	Document & Data Control	Systems Manager
	Legal	Legal Manager
	Procurement	Procurement Manager
	Travel & Expenses	F&A Manager
07.	Environmental Manual (ENV procedures)	Systems Manager
08.	Asset Manual (AM procedures)	Operations General Manager
09.	Information Technology Manual (IT procedures)	Chief Financial Officer
10.	Business Development Manual (Omega Processes)	Proposals Manager
11.	Design Build Management (DB procedures)	Design Build General Manager (East)
12.	Operations Manual(s) (Plants) <ul style="list-style-type: none"> • Operating Procedures Manual • Maintenance Procedures Manual • Laboratory Manual (O&M, LAB, OPS, PC, MTN, FCP procedures)	Plant Manager

Typically, the Systems Manager is assigned as either an author or reviewer to documents where the impact of change may affect the integrity of certification to the standards.

Each document has an assigned document approver, typically being the site Systems Coordinator/Administrator, whose main function is as follows

- Check for any comments made by the reviewers;
- Ensure the change synopsis has been completed for each new version of a document;
- Ensure the document complies with the standard format, including the document header and footer (issue number and date);

All corporate documents are approved for release by the Head Office Systems Coordinator/Administrator, with site specific documents approved for release by the local representative.

Any new documents are developed by the subject expert or individual responsible for the content. All new documents are reviewed by the Systems Manager, who is responsible for assigning document reviewers and review frequency and to ensure the content does not compromise company procedures or the integrity of certification.

8.6.3. Responsible for Omega Processes

The management of processes and documents in Omega is the responsibility of the SUEZ WTS Group. Where SUEZ WTS procedures do not exist Omega procedures may be applied or SUEZ WTS documents developed to meet the requirements of Omega. Any SUEZ WTS specific documentation saved to IMS is the responsibility of the Systems Manager.

Where SUEZ WTS has its own developed procedures or documentation that meets the requirement Omega, these procedures (in the IMS) are referenced in crossing matrices saved to the Omega Management System.

Compliance with Omega (and the associated crossing matrices where applicable) is the responsibility of SUEZ WTS functional managers as follows;

Omega Process	Responsible Person
Design and Build	Design Build General Manager
BOT	Executive Director
Services	Operations General Manager (East)
Equipment	Executive Director
Legal	Legal Manager
Finance	F&A Manager
Supply Chain	Procurement Manager
Health, Safety, Environment	Systems Manager
Information System	Systems Manager
Human Resources	Human Resources Manager

8.6.4. Responsible for Management System Implementation

The Plant Manager is responsible for the implementation, ongoing maintenance and performance of the management systems at the plants.

The Systems Manager is responsible for the implementation, ongoing maintenance and performance of the management system at the head office.

The Human Resources Manager is responsible for supporting the Plant Managers in delivering training and development of staff including training in the management systems.

8.6.5. Responsible for the Administration of Systems

The site System Administrators/Coordinators are responsible for administering systems locally at the plants and the head office including:

- internal audit program,
- training records, including records generated by the Management System,
- license & permits registers (IMS)
- controlled documents
- copies of system manuals,
- copies of legislation,
- Safety Risk Register
- Environmental Aspect Register
- Contractor/Supplier Database (IMS)

8.6.6. Responsible for the control of documents

All system documents are controlled within the online management system. Any additional hard copy documents required to be kept are detailed in the online management system under "Hard Copy Location".

The respective Systems Administrators/Coordinators are responsible for ensuring any hard copy documents kept at the site, including head office, are updated with any change to the controlled version within the online management system.

8.6.7. Support to other SUEZ WTS Operations

SUEZ WTS management will monitor compliance and continual improvement delivered through the systems via Board and Business Review meetings. SUEZ WTS will instigate all necessary audits/reviews to monitor statutory compliance.

SUEZ WTS Systems Manager will provide BU interface and reporting.

HVWS maintain their own Management System and are supported in the development and maintenance of the plant management systems by SUEZ WTS and Beca. SUEZ WTS is available to provide systems support as and when required and on request to HVWS.

Allwater (Adelaide Alliance) will be supported in the development and maintenance of the management systems by both SUEZ WTS and Transfield Services. SUEZ WTS is available to provide systems support as and when required and on request by Allwater. Allwater will maintain its own separate certifications.

Aroona (Perth Alliance) will be supported in the development and maintenance of the management systems by both SUEZ WTS and Transfield Services. SUEZ WTS is available to provide systems support as and when required and on request by Aroona. Aroona will maintain its own separate certifications.

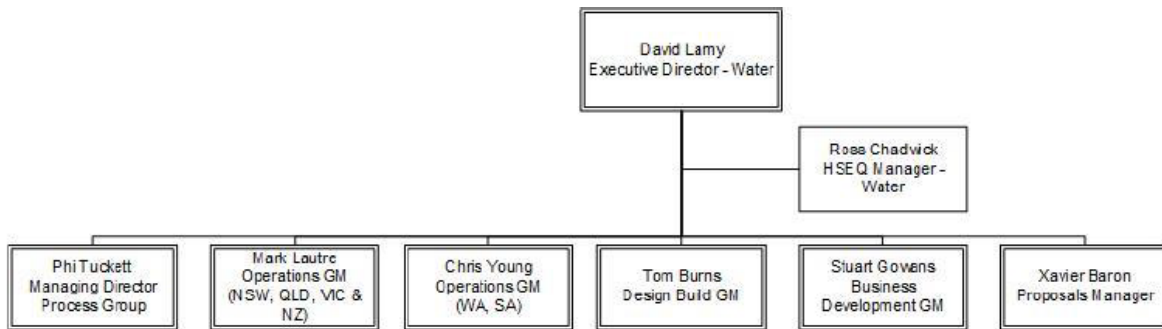
The Victoria Desalination Plant will be supported in the development and maintenance of the management system for SUEZ Thiess Services Joint Venture (SJV). SUEZ WTS is available to provide systems support as and when required and on request by DTSJV. The SJV will maintain its own separate certifications

8.6.8. Implementation of the Revised Arrangements for MS management

The review of system documents will be driven by the predefined review frequency set up for each of the documents in the online management system. Additional reviews will be undertaken on an ongoing basis as part of the continual improvement process driven essentially by the internal auditing process.

Review of the management system and these arrangements will be conducted through the Business Review meetings and/or the Management Systems Review meetings.

MANAGEMENT STRUCTURE

Referenced Elements in Standards:

ISO 9001:2008: 5.5.1

ISO 14001:2004: 4.4.1

AS/NZS 4801:2007: 4.4.1

OHSAS 18001:2007: 4.4.1

9. ALLOCATION OF RESOURCES**9.1. Availability of Resources**

Each manager is responsible for the assessment of resources needed to achieve company's objectives in their areas of responsibility. Such assessment includes human resources management planning, skills, knowledge, systems, processes, procedures, equipment and financial resources required.

Ultimately SUEZ WTS top management is responsible for reviewing the need for resources and providing the resources required for the efficient operations of all areas of the business and for the achievement of company's objectives.

The Executive Director shall ensure that appropriate resources are available for the management of company activities, performance of work and verification activities including internal audits. All personnel assigned to these tasks shall be adequately trained and qualified to carry out each task.

To ensure appropriate financial resources are available for the successful achievement of WHS/OH&S and Environmental objectives, budgets are allocated to WHS/OH&S and Environmental performance improvements i.e.:

- Capital works and modification to plant or equipment,
- Purchase of maintenance equipment necessary for the protection of the environment,
- Resources necessary in the event of an emergency,
- Insurances covering public liability, workers' compensation, personnel's liability and various legal requirements,
- Establishment, maintenance and auditing of management systems,
- Environmental and WHS/OH&S improvement initiatives,
- Clean up and remediation costs,
- Incidents and injury investigations,
- Treatment and disposal of wastes,
- WHS/OH&S and environmental training,
- Various studies and external audits in particularly those required to assess risks,
- Cost of licences and permits,
- WHS/OH&S and environmental inspections, testing and monitoring,

- Personnel's health testing and immunisations.

Referenced Elements in Standards:

ISO 9001:2008: 5.5.1, 5.5.2

ISO 14001:2004: 4.4.1

AS/NZS 4801: 4.4.1

OHSAS 18001:2007: 4.4.1

9.2. Human Resources Management

SUEZ WTS recognises that its most valuable resource is its staff and is committed in creating a competent and motivated workforce as a means of encouraging continuous improvement within the organisation.

Accountability and Responsibility

Role descriptions, defining responsibilities, accountability and authorities for all personnel are documented. These roles are reviewed by both the employee and the manager on a regular basis to ensure constant matching of employees' responsibilities with changing business objectives.

The Human Resources Manager maintains role descriptions. Plant Managers keep copies on site.

In the unforeseen absence of any employee, that employee's responsibilities and authorities shall be designated at the direction of their immediate manager.

Consultation, Motivation and Awareness

Employees are encouraged and enabled to be involved in many areas of activities where their input is necessary for the good operation of the company and for the improvement of its performance.

Employees' involvement is encouraged in determining the company Business Plan and corporate business objectives. Their participation is sought after in identifying WHS/WH&S/OH&S hazards and environmental aspects both in formal processes and in their day-to-day work. Employees are involved in assessing the level of risks and the control or mitigation measures required in order to bring hazards to an acceptable level. Employees are also involved in the development of procedures.

All employees are provided with appropriate information, equipment and/or training about the potential hazards of the plant/equipment, materials and/or services to which they may be exposed.

Employees are consulted and kept informed and trained (where applicable) when there are changes to their workplace and when selecting their representative on SHE committees.

Employees' motivation is seen as the result of employees' feeling that their work and their participation are recognised, rewarded, that they are offered career opportunities and that they are confident in their ability to carry out their responsibilities because of their appropriate level of training.

SUEZ WTS has established a system of employees' performance management as a way of measuring employee's effectiveness and aligning their performance with the achievement of company objectives.

A system of reward and recognition is also provided that is consistent with the company's objectives.

Knowledge, Skills, Attitudes and Behaviours

All functions that need acquired skills, and which could be adversely affected by the lack of such skills, shall be identified and documented.

Each Department Manager and each Plant Manager shall be responsible for identifying the training needs of staff working under his/her responsibility and for maintaining training records. Training needs of staff whose duties may create a significant impact on the environment or impact safety are evaluated and training carried out.

Management shall also be responsible for identifying the behaviours and skills required from prospective staff during the selection and recruitment processes.

Competence shall be defined as:

- experience;
- qualifications, and/or
- training (internal or external).

Documentary evidence of such competence and reviews shall be maintained.

All personnel shall receive instruction in management systems principles, company's policies and procedures relevant to their functions. Such instruction shall form part of the induction processes.

SUEZ WTS's management is responsible for establishing the skills required by the organisation as a whole for the achievement of its objectives, the satisfactory operation of all its activities and the provision of career development.

SUEZ WTS has defined the values it wants to promote within the organisation. Adherence to these values is encouraged in every aspect of the work and they are reflected in the recruitment process and during performance reviews. Values are aligned with and support the achievement of business objectives.

Referenced Elements in Standards:

ISO 9001:2008: 4.18

ISO 14001:2004: 4.4.2

AS/NZS 4801: 4.4.2 – 4.4.3.1

OHSAS 18001:2007: 4.4.2, 4.4.3

10. COMMUNICATION AND INFORMATION SYSTEM

10.1. Information System

Communication is a pivotal issue within an organisation. Good communication within the organisation allows better understanding and achievement of the company's objectives. It is critical in the management of change and employees' wellbeing and motivation. Good communication with stakeholders external to the organisation provides the opportunity for their input and creates an environment of mutual trust.

SUEZ WTS internal communications are established through a system of meetings dealing with operational, as business, safety and environmental issues.

Informal communication is carried out by encouraging open communication at all levels in the organisation, sending quick information through E-mails, memos and notice board displays.

SUEZ WTS has established both formal and informal systems of conveying information to the community. This includes:

- Provision of information for the general public on each site,
- Provision of specialised information on request after approval from authorised personnel,
- Provision of a contact phone number available for lodging comments and complaints,
- Website which displays general information about SUEZ WTS business and the operation of its plants.

Personnel authorised to provide information to the community and to the media have been identified and training provided, when necessary.

Emergency plans are in place that cater for neighbours and the general public.

Complaints are recorded and handled in a systematic way. They are addressed in an appropriate and timely manner.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

AS/NZS 4801:2001: 4.3.2 – 4.4.3.2

OHSAS18001:2007: 4.4.3

10.2. Reporting System

The system includes appropriate arrangements for communications with clients, community, authorities and the media. Relevant authorities are involved in the review of emergency planning arrangements and are kept up-to-date with information on these arrangements. The responsibility, means and timeframe for reporting incidents to authorities is documented.

Community is given access, on request, to the arrangements in place to mitigate the impacts of incidents on the community and the environment.

Incidents Management Plans define the requirements and responsibilities for reporting incidents to authorities, clients and within SUEZ WTS.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

AS/NZS 4801:2001: 4.4.3 – 4.4.5

OHSAS 18001:2007: 4.4.3 – 4.4.5

10.3. Communication In Emergencies

SUEZ WTS has established Incident Management Plans and operational procedures on all its sites, describing how communications shall be handled internally and externally.

The management of a crisis situation is established, it details the authorisation and skills necessary to communicate with the media.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.3

AS/NZS 4801:2001: 4.4.3 – 4.4.5, 4.4.7

OHSAS 18001:2007: 4.4.3 – 4.4.5, 4.4.7

11. PROCESS AND ACTIVITY MANAGEMENT

11.1. Identification of Processes and Activities

Processes and activities, which require control for the achievement of quality or conformance to WHS/OH&S or environmental obligations, are identified and managed to ensure the company's objectives are achieved.

Design activities required for the achievement of quality are defined in a Design Brief that describes, as a minimum:

- description of works;
- resource requirements;
- time schedule;
- outputs of the works;
- budget requirements;
- verification requirements;
- applicable requirements from Degrémont' client;
- quality assurance, WHS/OH&S and environmental requirements;
- all contractual and authorities' requirements to be complied with;
- all critical performance requirements in the process including those that have been identified as such by the client. These products and services may be an area of the operations, design elements, particular components of the plant etc.

Operational, maintenance or project delivery activities and processes are identified at the commencement of the activity. Those activities or processes required, as a minimum, for the achievement of contractual, legal and regulatory compliance are identified in corporate procedures, operational or maintenance procedures, Project Plans or schedules of activities (maintenance, testing, etc.).

Those activities or processes, which may impact on safety or the environment, are identified in a systematic way through an initial review and control or mitigation applied to them.

Processes and activities requiring specific skills and knowledge are identified on training programs.

Referenced Elements in Standards:

ISO 9001:2008: 7.5.3

ISO 14001:2004: 4.4.6

AS/NZS 4801:2001: 4.4.6

OHSAS 18001:2007: 4.4.6

11.1.1. Hazard Identification and Risk Management

SUEZ WTS maintains documented procedures for hazard identification, hazard/risk assessment and risk mitigation and control.

Regular reviews of such assessments are undertaken at the operational sites to evaluate the effectiveness of the mitigation controls.

Plant Managers are responsible for the periodic review and management of risks at the operational sites.

Referenced Elements in Standards:

AS/NZS 4801:2001: 4.3.1

OHSAS 18001:2007: 4.3.1

11.1.2. Environmental Aspects

SUEZ WTS maintains documented procedures for the identification of environmental aspects and the management of these aspects that have or can have a significant impact on the environment,

Regular reviews of the significant environmental aspects are undertaken to evaluate the effectiveness of the mitigation controls.

Plant Managers are responsible for the periodic review and management of environmental risks at the operational sites.

Referenced Elements in Standards:

ISO 14001:2004: 4.3.1

11.2. Management of Processes and Activities

Planning of processes is necessary to ensure they are properly controlled and the required outcome is achieved.

Responsibility for the planning of activities rests with the manager responsible for the particular activity, typically the Manager shall be:

- a Bid Manager for the preparation of offers which includes concept design,
- a Project Manager for all capital work and project management activities which include detailed design,
- a Plant Manager for plant operational issues including maintenance of plant and facilities,
- a Manager for the preparation of a consultancy for a client.

The Manager shall be also be responsible for defining the requirements prior to execution and developing means to ensure that all processes and activities are coordinated and controlled.

In planning these processes and activities, the Manager shall give consideration to contractual, legal and regulatory obligations and the needs and expectations of interested parties, when relevant.

Those activities or processes required, as a minimum, for the achievement of contractual compliance shall be controlled via documented procedures or, when these processes or activities are outside of the normal scope of corporate or site level procedures, within Project Plans.

When a Project Plan is needed, procedures shall detail as appropriate meetings, reporting structure, use of verification checklists, inspections, product audits and how WHS/OH&S and Environmental issues shall be managed.

Referenced Elements in Standards:

ISO 9001:2008: 5.4.2, 7.1

ISO 14001:2004: 4.4.6

AS/NZS 4801:2001: 4.4.6

OHSAS 18001:2007: 4.4.6

11.3. Capability of Processes

SUEZ WTS has established controls to ensure capability of its processes in achieving the required outcome. The system includes provision for:

- Design of plants and equipment to specifications,
- Commissioning of plants and equipment to validate their performance prior to operations or installation,
- Continuous monitoring of process characteristics and subsequent process adjustments,
- Calibration of equipment,
- Maintenance of plant and equipment. Including the identification of critical spares and management of those spares

Referenced Elements in Standards:

ISO 9001:2008: 8

ISO 14001:2004: 4.4.6

AS/NZS 4801:2001: 4.4.6

OHSAS 18001:2007: 4.4.6

11.4. Process Control

SUEZ WTS business includes the control of various projects and activities such as:

- capital works projects;
- the operation and/or maintenance of plants or infrastructure;
- the provision of consultancy studies.

The Executive Director shall nominate a manager for each project or activity, who shall be responsible for its execution, typically the Manager shall be:

- a Bid Manager for the preparation of offers which includes concept design,
- a Project Manager for all capital work and project management activities which include detailed design,
- a Plant Manager for plant operational issues including maintenance,
- a Manager for the preparation of a consultancy for a client.

The Manager shall control the processes or activities by means of (as relevant):

- Development of procedures or Projects Plans;
- Establishment of product or service specifications to be met and the monitoring or measuring of product or service against these specifications,
- Acquisition and use of appropriate equipment,
- Maintenance of plant and equipment,
- The establishment of processes for the release or delivery of product or service.

The progress and compliance of all projects and activities shall be coordinated, controlled and reported through:

- regular meetings with the client;
- regular internal review meeting(s) with appropriate internal resources or external consultants; and
- progressive verification.

Verification and coordination of work carried out by contractors shall be established through similar methods.

The following sections describe the specific arrangements for processes that are critical for achievement of quality and for safety and environmental performance:

11.4.1. Management of Design

Design and development activities are controlled to ensure that product, projects and services meet specified requirements.

This section is applicable to:

- The delivery phase or bidding phase of capital works projects; and
- The provision of consultancy services.

These requirements are not applicable to the activities of the plants.

Design and development activities are normally carried out by suitably qualified external contractors in accordance with Design Briefs developed by SUEZ WTS against Client's specifications.

A Project Manager shall be nominated by the Chief Executive Officer for each capital works project or consultancy study. The Project Manager shall be responsible for directing the activities of the contractors in order to fulfil the client's requirements.

However, during bidding, design may be carried out prior to a design brief being developed, design input will be provided usually by the tender documents. The Bid Manager, or delegate, is responsible for controlling the design during the bidding phase

Prior to design or development activity being subcontracted, the Project Manager shall develop a Project Plan in conjunction with the Systems Manager. This plan shall detail how the design activities carried out by others are coordinated and controlled.

Design and Development Planning (only applicable to capital works projects)

The contractor responsible for design and development activities shall develop suitable Project Plans and provide those plans to SUEZ WTS for review and approval. In preparing plans, the contractor shall comply with documentation and data provided by Degrémont.

- Project Plans for the design and development phases shall include:
- the assignment of design and verification activities to qualified personnel with adequate resources;
- the organisational and technical interfaces within Degrémont, the contractor's organisation and subcontractors;
- identification of design inputs;
- design reviews and workshops (including CHAIR, FMECA, HAZOP and CHAZOP)

Definitions:

CHAIR: Construction Hazard Assessment Implications Review

FMECA: Failure Model Effect Critically Analysis

HAZOP: Hazard and Operability Review

CHAZOP: Control Hazard and Operability Review;

- methods for documenting the design outputs;
- verification methods; and
- method for controlling design changes.

Design input supplied by Degrémont to contractors or consultants, as appropriate, shall be in the form of a Design Brief or Letter of Engagement.

The Project Manager shall develop the Design Brief (for capital works project) or a Letter of Engagement (for consultancy studies) from data supplied by the client and in-house resources before any design and development activities commence.

In preparing such briefs or letters the Project Manager shall review all data to ensure the requirements are clearly defined. Any inadequacies in the information shall be resolved with the client.

Design Reviews

Design reviews shall be carried out at appropriate stages of the design. These reviews shall be formal, documented activities which shall be planned as Design Reviews Meetings. Design Review Meetings shall be attended by representatives of all functions concerned with the design stage being reviewed, as well as other specialist personnel, as required. Identification and appropriate controls of environmental impacts and safety risks shall form a part of design reviews. Records of design reviews shall be maintained.

Design Outputs

Design Outputs generated by contractors or consultants shall generally be in the form of drawings, specifications, calculations, models, etc.

All design outputs shall be generated in accordance with Degrémont' requirements as defined in the Design Brief or Letter of Engagement. Design outputs shall comply with the design input requirements and for capital works projects;

- contain or reference acceptance criteria in terms of inspection and testing requirements;
- conform to appropriate regulatory standards; and
- identify critical aspects of the design, which may have an effect on the safe and proper functioning of the project.

Design Verification

The Project Manager shall verify that work carried out by contractors and consultants complies with the Design Brief or Letter of Engagement.

Design verification shall objectively ensure that the design outputs meet the design requirements by one or more of the following means:

- design review meetings;
- qualification testing and demonstrations of compliance;
- alternate calculations of design results;
- comparison of the new design against a similar proven design; and
- pilot or model testing.

The results of internal design verifications recorded by the contractor or consultant shall be made available to Degrémont.

Degrémont shall maintain the right to audit design and development work carried out by contractors.

Design Validation

Design validation shall be performed to ensure that the client's specified needs and/or requirements have been satisfactorily incorporated into the project, product or consultancy service.

Design validation shall be performed on the finished project or product whilst under normal operating conditions, shall be carried out as earlier as possible in the project or product development.

Final design validation will normally be during project or product commissioning.

Design Changes

Design changes may be made for any of the following reasons:

- Changes by Degrémont to the Design Brief or Letter of Engagement.
- Changes initiated by design verification process, either by Degrémont or a contractor or consultant.
- Changes as a result of the contractor or consultant's review processes.

The procedures for controlling design changes by contractors in the case of capital projects and the involvement of Degrémont shall be clearly defined in the applicable Project Plan.

Design Co-ordination Meeting

This section is applicable to all capital projects and, if deemed necessary by the Project Manager, to consultancy studies.

This meeting coordinates design activities with all parties involved in the design process, including contractors and consultants.

This meeting controls, monitors and implements the following:

- Design development and documentation,
- Verification of key design elements within the Design Brief (or the Letter of Engagement),
- Alteration to the Design Brief (or the Letter of Engagement),
- Documentation of the process indicating the development of the design to meeting the client's requirements.

11.4.2. Product Identification and Traceability

SUEZ WTS provides traceability of its products and services and traceability of chemicals and additives used in the treatment / filtration process or for testing.

This section is applicable to the commissioning and operations phases of capital works. Identification and traceability of products during design and construction of capital works shall be the responsibility of the contractor.

All capital works shall be carried out by contractors who are responsible for ensuring correct identification of their product.

Personnel responsible for the commissioning, the operations and maintenance of works shall ensure that all products are identified. Unless otherwise specified, products received from a supplier shall retain their original identification.

Specific identification methods shall be defined in Project Plans and Site-Specific procedures.

Traceability shall be provided in the supply of chemical products and additives and elsewhere as required.

Such traceability shall be ensured through the identification of all products supplied under a specific contract and monitoring during storage and usage.

11.4.3. Handling, Storage, Packaging, Preservation and Delivery:

This section describes the manner in which product quality is maintained during handling, storage, packaging and delivery.

This section is applicable to the commissioning, if under Degremont's direct responsibility, and operations phases of plants only. The handling, storage, packaging, preservation and delivery of products during the delivery phase and commissioning phase, if under a contractor's responsibility, of capital works projects shall be the responsibility of the contractor, where appropriate.

All products shall be handled and stored in a manner, which prevents damage and deterioration.

Personnel responsible for the operations of works shall ensure that storage facilities are appropriate for the type of product, comply with all SUEZ WTS and regulations related to safety of personnel and protection of the environment. The condition of products in storage shall be regularly assessed.

11.4.4. Servicing

This element of AS/NZS ISO 9001 is not presently applicable to the management system of SUEZ WTS.

Should the company carry out servicing in the future, appropriate policies and procedures shall be developed.

The requirements for the control of servicing during project related activities shall be defined in applicable Project Plans.

This element is not applicable to the activities of the plants.

11.4.5. Control of Customer Supplied Product

This section outlines the way in which all products provided by clients to SUEZ WTS is controlled. Such product may include, but is not limited to:

- various assets including land;
- products received for treatment, etc;

- products to be used in the treatment; and
- data and/or information.

This section is applicable to all company activities.

If a client supplies products for use on or incorporation into a project or product supplied by Degremont, those products shall be controlled. Control shall include, as appropriate:

The verification of the product prior to use to ensure "fitness for use", correct quantities have been received and that all necessary documentation has been supplied.

- The appropriate storage of the product to ensure it remains fit for use.
- Maintenance and evaluation of the condition of the product, as appropriate.
- Evaluation of compliance of assets and land with legal and regulatory obligations and negotiation with the client for correction of non-conformances.

If any client-supplied product becomes lost, damaged or otherwise unsuitable for use, details shall be recorded and reported to the client. Corrective action, if appropriate, shall be determined by agreement with the client.

Referenced Elements in Standards:

ISO 9001:2008: 7.3, 7.5.3, 7.5.5, 7.5.1, 7.5.4

11.5. Process Change Control

Proper control of modifications and changes to the plant or process needs to be exercised to prevent or minimise impacts on the operations, safety or the environment.

SUEZ WTS has defined what constitutes a modification or a change. Procedures have been developed and implemented for all changes, which require control. They document responsibilities for authorising changes, the need for assessing the impact of the change on plant operability, safety or the environment including changes to the organisational structure and the assessment on safety implications associated with such changes.

Records are kept of review process, approvals, inspection and testing activities, training of staff, modification to procedures and technical documentation.

Referenced Elements in Standards:

ISO 9001:2008: 7.5.1, 6.3, 6.4

ISO 14001:2004: 4.6

AS/NZS 4801:2001: 4.4.6.1

OHSAS 18001:2007: 4.4.6

11.6. Contractor or Supplier Management

SUEZ WTS has established controls for contractors engaged under contract for a service on-site or off-site and for suppliers of goods or services. Additional controls are in place for "Critical Suppliers"; whose goods or services may impact significantly on SUEZ WTS's ability to perform its contractual, legal and regulatory obligations or to achieve its environmental or safety objectives or targets.

Selection

SUEZ WTS has a policy by which its suppliers are reviewed for technical, commercial and quality capabilities and safety and environmental performance prior to hiring or purchasing.

Suppliers shall be selected on the basis of their ability to supply products or services, which meet Degremont's requirements. The following selection criteria shall be used as appropriate for the types of products and services:

- Past experience with similar work and the acceptability of that work;
- Operation of a quality system approved by the Company, a 2nd party (e.g., client), or a 3rd party (e.g., Standards Australia);
- Nomination by the client;
- Technical and commercial capabilities;
- Commercial considerations; and

- Resources complying with the delivery time frame;
- An acceptable safety record;
- Appropriate resources and compliance in the services to be provided;
- Supervisory capability to manage work.

Records shall be maintained of the evaluation methods and results.

A Critical Suppliers List recording the approved suppliers and the suppliers not to be used is maintained.

Purchasing

Typically, Degrémont will purchase:

- services used to assist in the delivery of projects, products or services to clients;
- products for direct delivery to clients; and
- products or services to be used for the management and administration of the company.

Purchasing documents shall contain a clear description of the product or service required and make reference to the relevant drawings, technical specifications, goods specifications, and Australian/New Zealand or International Standards as appropriate. Where appropriate a brief, contract or Letter of Engagement shall be prepared which shall contain scope of work, performance specifications, authority requirements, environmental and incident management requirements and commissioning requirements.

When products are to be purchased, the purchasing document shall contain, as appropriate, drawing references, catalogue numbers, identification codes and titles, chemical and physical analysis, process requirements and any other relevant data.

Purchasing documents shall stipulate compliance with legislation, regulations and SUEZ WTS specifications in relation to WHS/WHS/OH&S, environmental and (when appropriate) protection of drinking water supply.

All purchasing documents shall be reviewed and approved prior to release to the suppliers.

Evaluation of Suppliers

Critical suppliers' performance shall be evaluated regularly against established criteria. Evaluation shall consider performance in delivery a quality product or service, timeliness, price, customer service and WHS/WHS/OH&S and environmental practices.

Management of Suppliers Working On Site

Suppliers working on site have to demonstrate their ability to work in a responsible manner and not endanger SUEZ WTS liability on safety, environment or public health issues. Induction is provided by SUEZ WTS on these issues.

All contractors working on site are required to be inducted and to obtain clearance for their work which includes a risk assessment and, when relevant to their job, the provision of work method statements or safe work plans.

Verification Of Purchased Product Or Service

This section is applicable to all activities associated with the delivery of projects, products, consultancies and/or services.

Verification of purchased product or service means:

- verification by SUEZ WTS of products or services supplied by their suppliers; and
- verification by SUEZ WTS clients of products or services supplied by SUEZ WTS .

Verification by SUEZ WTS:

SUEZ WTS shall exercise its right to carry out verification activities of the work carried out by a supplier or supplier's supplier to ensure adequate controls are in place.

Verification can be achieved by one of the following methods:

- develop the design to the extent that specific suppliers and manufacturers are nominated and product characteristics identified; or
- develop a preliminary specification and audit the products during the works delivery phase.

Verification by SUEZ WTS clients

The client and/or their representative shall have the right to audit that work or service delivered meets the requirements of their system.

Audit by the client shall not be used by SUEZ WTS as evidence of effective control of quality by suppliers.

The Systems Manager shall be responsible for ensuring that suitable arrangements are made for such verification.

Referenced Elements in Standards:

ISO 9001:2008: 7.4

ISO 14001:2004: 4.4.3

AS/NZS 4801:2001: 4.4.3.2

OHSAS 18001:2007: 4.4.3

11.7. Documentation

The success of an organisation depends increasingly on its ability to manage properly the information it produces and receives as a way of operating its business better and managing its management systems.

All documents and data required for the achievement of quality, WHS/WHS/OH&S and environment; either generated internally by Degremont or provided by clients or contractors shall be identified and controlled.

In SUEZ WTS's system, a Document is a "statement of commitment to be met by SUEZ WTS".

Documents and data may be in the form of hard copy, electronic or other media.

Documents and data required for the effective operation of the management systems are:

- Business Practices Manual.
- Company Procedures and forms
- Site level procedures and forms.

These documents are controlled within the online management system, with each document having an assigned author, reviewer(s), approver and document review frequency. Documents within the online management system clearly reflect whether a document is authorised, in draft or in the review process. A workflow log is automatically generated by the online management system to track the movements of the document through the review and approval process. As a minimum, these documents will be reviewed at least every five years, with more frequent reviews assigned to documents that are of a higher risk nature, as determined by the Systems Manager or other management.

Documents and data required for the achievement of quality, WHS/WHS/OH&S and environmental performance are, but not limited to:

- Contractual arrangements with clients and shareholders,
- Technical Standards,
- Technical Specifications and Drawings,
- Regulatory Licences and Permits,
- Relevant acts and regulations,
- Material Safety Data Sheets.

Currently, Technical Standards, Regulatory Permits & Licence, Relevant Acts & Regulations and Material Safety Data Sheets are controlled via the online management system.

Managers shall ensure that the current issue of relevant documents is made available at specified locations, where such documents are required for the achievement and maintenance of product quality or compliance with WHS/OH&S or environmental obligations. Generally, these documents are made available via the online management system, however, hard copy documents may also be required at the point of use e.g. MSDS. Such hard copy documents are reflected in the online management system. When more appropriate, another means may be defined in Project Plan to control specific documents (e.g. drawings).

Document authors and reviewers shall have access to, and shall take notice of, relevant background information when undertaking a review and approval of document changes. All changes to documents controlled via the online management system will be accompanied by a brief synopsis of the change. In the case of documents provided by the client, such procedure shall be limited to a review of the documents.

The site Systems Coordinators/Administrators, shall ensure that any obsolete hard copy documents are removed, or identified as obsolete, from all points of issue or use. Where appropriate, obsolete hard copy documents shall either be destroyed (if an electronic version is controlled within the online management system) or returned to the site Systems Coordinator/Administrator for disposition.

Documents controlled within the online management system are automatically archived when a new version of the document is approved. Superseded documents shall be retained by the Company for a minimum period of 7 years after the expiry of the contract, after which they may be destroyed at the discretion of the Systems Manager.

The online management system shall be maintained by the Systems Manager in conjunction with the site Systems Coordinators/Administrators.

Referenced Elements in Standards:

ISO 9001:2008: 4.2.3

ISO 14001:2004: 4.4.5

AS/NZS 4801:2001: 4.4.5

OHSAS 18001:2007: 4.4.5

11.8. Emergency Preparedness

SUEZ WTS has identified emergencies on all its sites and established incident management plans describing how incidents shall be managed to minimise the consequences of emergency situations and to allow prompt recovery. The potential emergency scenarios are based upon assessment of the hazards and risks.

The system includes relevant arrangements for communications with clients, community, authorities and the media. Relevant authorities are involved in the review of emergency planning, and are communicated information on these arrangements. The responsibility, means and timeframe for reporting incidents to authorities is documented.

Incident management procedures detail the actions to be taken for all identified potential incidents to mitigate the impacts and the responsibilities for doing so.

Identified emergencies are periodically simulated, when practicable, to allow an adequate response to occur when an actual incident or emergency occurs. Emergency simulations or real emergencies are followed by a debriefing, which prompts a review of procedures and practices, when necessary.

Referenced Elements in Standards:

ISO 14001:2004: 4.4.7

AS/NZS 4801:2001: 4.4.7

OHSAS 18001:2007: 4.4.7

11.9. Security

Security is maintained at SUEZ WTS operational facilities where only personnel authorised and legally eligible are allowed to enter and access areas within the facility.

The entry of visitors and contractors to operational facilities is controlled via documented procedures. This includes the requirements for personnel to undertake induction and/or be suitably hosted while onsite.

Operational facilities maintain safe and clear access and egress to and from the workplace during normal operations and emergency situations. Personnel are not to enter a work area or workplace that has not been declared safe.

As required, a Security Plan is developed for plant based on an assessment of the hazards and risks associated with its operations and in accordance with the requirements of the relevant legislation.

12. MEASUREMENT AND MONITORING

12.1. Measurement

SUEZ WTS has established documented procedure to monitor and measure the key characteristics of its operational that affect quality of its product, safety or environmental compliance.

12.1.1. Inspection and Testing

Inspection and testing are carried out on:

- activities carried out by SUEZ WTS or on its behalf (capital works projects, maintenance activities, studies, services...) are verified for compliance;
- products delivered by SUEZ WTS (i.e. treated water or other) are inspected and tested;
- products or services delivered to Degremon are inspected on delivery in order to verify conformance or otherwise with purchasing documents,
- activities that can affect safety or environmental performance are monitored and measured.

The manager responsible for the project or the activity shall develop verification means to control compliance of projects and activities (e.g. design, construction...) with contractual and authorities' requirements.

When SUEZ WTS is directly responsible for the product or services (e.g. during commissioning (when applicable) and operations phases of activities), SUEZ WTS will inspect and test as required.

The inspection and test requirements shall as a minimum comply with the sampling, identification and reporting schedules defined in client specifications, in authority's requirement and in SUEZ WTS Management Programs necessary to achieve safety and environmental performance. Records of inspection and tests directly carried out by SUEZ WTS during work delivery and commissioning phases may be kept on site.

A health surveillance program is in place to monitor the effects of exposure to specific hazards on personnel's health.

Additional inspection and test procedures shall be implemented from time to time in order to ensure the conformance of product delivered to the client or monitor safety and environmental performance. Such actions may include:

- Conducting specific research programs to identify the causes of non-conformance.
- Maintenance of operator efficiency through drills and simulations.
- Employment of external consultants to resolve process issues.
- Measuring customers' satisfaction.
- Additional testing of health or environmental issues.

When contractors or suppliers are used, the responsible manager shall develop procedures to verify the quality of the products or services delivered whenever this may impact on the quality of the product or service delivered by SUEZ WTS to its clients. The manager shall also specify in contract agreements responsibilities for WHS/OH&S and environmental monitoring when required.

Records of such inspections may be kept at the site.

During phases which are not directly under SUEZ WTS responsibility (design, construction and commissioning, when applicable), the manager responsible for the delivery of the product or service shall ensure that all contractors and suppliers providing goods and services whose quality may impact on the quality or the services or products delivered by SUEZ WTS to its clients do so in accordance with appropriate Project Plans with defined testing, hold points and report, and that these requirements are incorporated in contractors supply agreements or orders.

12.1.2. Inspection and Test Status

This section outlines the way in which the inspection and test status of activities or products are identified. This section is applicable to any activity where inspections and tests are carried out.

The inspection and test status of activities or products shall be readily identifiable at all times. Such identification shall provide for the ready identification of activity or product conformance or non-conformance.

Projects

The inspection authority responsible for the release of conforming product shall be identified on the appropriate inspection records. The inspection authority shall ensure that, before release, all previous inspections and tests have been completed in accordance with procedures or Project Plans.

Operations

Inspection authority shall be identified in job descriptions, procedures or Project Plans, when required under contractual agreements. The client or authorities shall be notified when inspection and tests have not met documented requirements.

12.1.3. Control of Inspection, Measuring and Test Equipment

Adequate inspection, measuring and test equipment is provided to demonstrate conformance to the specified requirements through a system of calibration and maintenance.

This section is applicable to the operations and, if under SUEZ WTS direct responsibility, shall be applicable to the commissioning or capital works delivery phases. The control of inspection, measuring and test equipment during the delivery and commissioning phases, if under a contractor's responsibility, shall be the responsibility of the contractor.

Work requirements shall be reviewed prior to execution to determine whether any inspection and test equipment or capability, including computer software, additional to that currently available, is required.

Equipment that requires calibration for the achievement of product or service quality or necessary for the monitoring of WHS/OH&S or environmental compliance shall be identified.

A list of all inspection, measuring and test equipment requiring calibration shall be maintained and all such equipment shall be uniquely identified.

Where calibration is carried out in-house, calibration procedures shall be maintained that shall contain details of equipment type, identification number, location, frequency of checks, check method, acceptance criteria and the action to be taken when results are unsatisfactory.

External calibration shall be carried out by suitably approved testing organisations, which shall provide a certificate of calibration, detailing the standard achieved and traceability to national standards. (where appropriate)

Check frequencies shall be dependent upon previous results and/or the consequences of equipment malfunctions. Any decrease to such frequencies shall be properly authorised prior to execution.

Where possible calibration status and date of next check, shall be shown on inspection, measuring and test equipment, all other equipment shall be traceable through unique identification to calibration records.

Records of calibration that provide details of results, traceability and check frequencies shall be maintained. Calibration records shall be kept on site.

Where necessary, equipment shall be handled, preserved and stored in such a manner to prevent unauthorised adjustment and to ensure accuracy and that fitness for purpose is maintained.

Where a piece of equipment is found to be out of calibration a review shall take place of all products accepted during the period since the last check took place to determine what action should be taken on products accepted since the previous check.

Any calibration standard or measuring equipment suspected of, or known to be outside the limits of accuracy shall be withdrawn from use immediately and identified as such until corrected.

Jigs, fixtures, templates or other similar devices used for inspection verification shall be checked initially for accuracy, or shall be proven prior to release for use on production and re-checked at defined intervals. When requested by the customer the design data for this equipment shall be made available.

Where used, the Company shall ensure that the environmental conditions are suitable for the calibration, inspection or measurement being conducted.

12.1.4. Statistical Techniques

This section describes the way in which appropriate statistical techniques will be utilised within the quality assurance system, as and when required.

Process control data shall be analysed, using appropriate statistical techniques, to identify levels of process capability when required.

Appropriate acceptance sampling plans may also be used to conduct a final quality audit on finished products prior to delivery.

The results of all statistical analyses shall be properly documented and evaluated to identify levels of performance and initiate corrective action where appropriate.

Referenced Elements in Standards:

ISO 9001:2008: 8, 7.6, 7.5.3

ISO 14001:2004: 4.5.1

AS/NZS 4801:2001: 4.5.1

OHSAS 18001:2007: 4.5.1

12.2. Conformance

SUEZ WTS has established the parameters to be measured, the acceptance criteria to be met and the relevant procedures to be used to demonstrate conformance of its activities with specified requirements. This applies to all activities, which could affect the quality of the product or service or could significantly impact on safety of its personnel or the environment.

Referenced Elements in Standards:

ISO 9001:2008: 7.4, 8

ISO 14001:2004: 4.5.1 – 4.4.6

AS/NZS 4801:2001: 4.5.1 – 4.5.3

OHSAS 18001:2007: 4.5.1 – 4.5.3

12.2.1. MHF Compliance

As a minimum, the following criteria are maintained for MHF Compliance.

- Data is collected and performance indicators are developed to analyses the WHS/OH&S operating performance, where appropriate targets are set for each performance indicator.
- Performance indicators are selected and implemented to gauge the effectiveness of the control measures in eliminating or managing the risks
- Performance indicators are identified that indicate whether there is a failure of a critical control measure, and for each critical control measure the corrective actions to be taken in the event of a failure are developed
- SMS performance effectiveness and compliance with the relevant legislation and WHS/OH&S policies is monitored, by the setting of performance indicators. The outcomes from this process are reviewed, actions recommended and reported.

12.3. Handling and Control of Non-conformances and Incidents

SUEZ WTS has established a system by which any form of non-conformance is detected and actioned. The system applies to, but is not limited to:

- Product or service quality failures,
- Environmental or safety incidents,
- Failure to comply with contractual, legal or regulatory obligations,
- Failure to implement procedures.

It is SUEZ WTS policy that any person detecting or made aware of a non-conformance shall document it on the appropriate report form. The report shall be passed on to the Systems Manager or delegate. The Systems Manager shall then pass the report on to the person nominated in the applicable procedure who has responsibility for evaluating the non-conformance.

If the non-conformance is a product or document supplied by a client, it shall be clearly identified as being nonconforming and segregated when possible.

The non-conformance shall be evaluated and a determination shall be made as to the disposition of the non-conformance in one of the following categories:

- rework to specified requirements;
- accept with or without repair by concession;
- re-grade for alternative application;
- scrap; and
- return to the supplier.

Any product which has been reworked or repaired shall be inspected in accordance with appropriate procedures.

Environmental and safety incidents are regularly reviewed by management and considered when establishing the register of environmental hazards and the register of safety risks.

The obligation to reporting Environmental and safety incidents to relevant statutory authorities is assigned to relevant personnel.

Referenced Elements in Standards:

ISO 9001:2008: 8.3

ISO 14001:2004: 4.5.2

AS/NZS 4801:2001: 4.5.2

OHSAS 18001:2007: 4.5.2

12.4. Corrective / Preventive Action (Products, Processes and System)

This section describes the way in which corrective and preventive action is implemented.

Procedures have been established for implementing corrective and preventive action to eliminate the causes of actual or potential non-conformances to a degree appropriate to the magnitude of problems and commensurate to the risks encountered.

Where appropriate, changes to methods of operation resulting from corrective or preventive action shall be reflected in changes to procedures and/or work methods and subsequent promulgation to all functions concerned.

The corrective action system includes methods for:

- effective handling of client complaints dealing with nonconforming products or services;
- investigating the causes of non-conformances and recording the results of investigations;
- determining appropriate corrective actions to eliminate the cause of non-conformance;
- applying controls to ensure that corrective action is taken and is effective; and
- mitigating the consequence of safety or environmental incidents.

The preventive action system includes methods for:

- the detection, analysis and elimination of potential causes of non-conformances by continually reviewing:
 - process and work operations,
 - audit results,
 - records of non-conformance and incidents,
 - client or community complaints,
 - client satisfaction,
 - results of WHS/OH&S and environmental monitoring,
 - results of risk assessments.
- Determining the steps needed to deal with any problems requiring preventive action.
- Initiating preventive action by way of training and changes to operating methods, and measuring the results to ensure that the action is effective.

- Ensuring that management and relevant staff review all pertinent information on preventive action as a means for continual improvement of the management system, the products and services provided by Degremont and safety and environmental performance.

Action plans developed to address corrective and preventative actions shall detail:

- Comments regarding root cause
- Timeframe for action closure
- Verification of action effectiveness when completed.

The corrective/preventive action process is managed online using the Integrum application

Referenced Elements in Standards:

ISO 9001:2008: 8.5.2, 8.5.3

ISO 14001:2004: 4.5.2

AS/NZS 4801:2001: 4.5.2

OHSAS 18001: 4.5.2

12.5. Internal Audits

SUEZ WTS has established a system of internal audits to assess the level of implementation of its management systems.

Procedure are audited at regular intervals to assess compliance with agreed procedures, identify any non-conformance and instigate corrective action where required. Audits also verify whether WHS/OH&S and environmental objectives and targets have been met.

Internal audits are carried out by trained personnel who are knowledgeable in the area audited. Technical experts may accompany the auditor if required.

An Audit Schedule shall be maintained with such scope as to ensure that all aspects of the corporate and projects quality systems and activities carried out for clients are audited.

Audits shall be scheduled on the basis of the status and importance of the activity and the results of previous audits.

The Systems Manager or delegate, shall establish an Internal Audit Schedule to ensure that all aspects of the management system are audited:

- as early as possible after implementation and at least once every 2 years thereafter, or
- frequency based on a risk assessment and evaluation in co-ordination with appropriate personnel and management

Other audits may be carried out according to the results of previous audits and the significance of particular activities (i.e. bids).

Audits shall include an evaluation of documents and records associated with each element.

Audits shall be performed in line with documented procedures and/or checklists that shall identify key elements.

Internal audits shall be undertaken by suitably qualified personnel who are not directly responsible for the area being audited. The Systems Manager shall be responsible for assigning auditing personnel.

Audit findings shall be documented and reported during management system review meetings.

The management responsible for an audited area shall review and agree any corrective actions necessary to correct deficiencies identified during the audit. Deficient areas shall be re-audited to ensure corrective action taken has been effective.

Referenced Elements in Standards:

ISO 9001:2008: 8.2.2, 8.2.3

ISO 14001:2004: 4.5.4

AS/NZS 4801:2001: 4.5.4

OHSAS 18001:2007: 4.5.4

12.6. Records

SUEZ WTS maintains records to demonstrate achievement of required standards and to document the effectiveness of the management systems.

SUEZ WTS has established a system by which records are identified to the project or activity they relate to, collected, indexed in a systematic manner, filed in a way which allows easy retrieval.

Such records shall comprise, but not be limited to:

- Achievement of requirements;
- inspection and test reports;
- test and monitoring data;
- quality control certificates,
- calibration results;
- suppliers' assessment reports;
- corrective/preventive action reports;
- training records;
- contract correspondence;
- incidents reports and investigations reports;
- risk assessment reports;
- correspondence with authorities;
- maintenance records.
- Management systems effectiveness:
 - Internal audit reports;
 - External audit reports; and
 - Minutes of Management Review Meeting

All records shall be legible and shall be identifiable to the product, activity or process concerned (as appropriate).

Records shall be stored and maintained in such a manner as to provide for ready access.

Storage facilities shall be such as to minimise deterioration or damage and prevent loss.

Records shall be retained for at least 7 years. Project related records shall be retained for the duration of the contract plus another 7 years

When specified in a contract, quality records shall be made available to the client for examination. Such records may be copied for the client who may not remove originals.

Referenced Elements in Standards:

ISO 9001:2008: 4.2.4

ISO 14001:2004: 4.5.3

AS/NZS 4801: 4.5.3

OHSAS 18001:2007: 4.5.4

13. MANAGEMENT REVIEW AND IMPROVEMENT PLAN

13.1. Management Review

Management systems reviews are organised at regular interval at both corporate and site levels to verify the continuous suitability, adequacy and effectiveness of the management systems in satisfying SUEZ WTS policies and objectives and the interested parties needs and expectations.

The process includes the review of:

- Findings of internal and external audits,

- Non-conformance, incidents and injuries,
- Changes to legislation, regulations or industry codes of practices that may impact company's activities,
- Progress of WHS/OH&S and environmental Management Programs,
- Progress against objectives and targets,
- Evaluation of the suitability of policies and procedures.
- MHF monitoring program (MHF sites only)

Referenced Elements in Standards:

ISO 9001:2008: 5.6.1

ISO 14001:2004: 4.6

AS/NZS 4801:2001: 4.6

OHSAS 18001:2007: 4.6

13.2. Improvement

SUEZ WTS is committed to continual improvement of its activities and processes through the continuous evaluation and review of its performance.

Referenced Elements in Standards:

ISO 14001:2004: 4.6

AS/NZS 4801:2001: 4.6

OHSAS 18001:2007: 4.6

APPENDIX 1: MANAGEMENT SYSTEMS MAP

(details how the requirements of various standards are met by SUEZ WTS procedures)

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
	4.1: General Requirements			Whole management system
	4.2: Environmental Policy			ENV-POL-01 Environmental Policy
	4.3: Planning			
	4.3.1: Environmental Aspects			DB-001 Design & Build Management DB-002 Design Management SYS-008 Management of Quality, Safety and Environmental Hazards AM-003 HAZOP Studies SITE-SPECIFIC SYSTEM: Environmental Management Plan or Site-based Management Plan
	4.3.2: Legal and Other Requirements			SYS-003 Legal and Regulatory Requirements
	4.3.3: Objectives and Targets			SYS-002 Objectives, Targets and Management Programs SYS-008 Management of Quality, Safety and Environmental Hazards
	4.3.4: Environmental Management Programme(s)			SYS-002 Objectives, Targets and Management Programs
	4.4: Implementation and Operation			
	4.4.1: Structure and Responsibility			HR-001 Recruitment of Permanent Staff SYS-001 OH&S & Environmental Responsibilities, Accountabilities and Authorities
	4.4.2: Training, Awareness and Competence			HR-002 Performance Management HR-004 Induction HR-005 Training and Development
	4.4.3: Communication			BPM-001 Business Practices Manual SITE-SPECIFIC SYSTEM: Tool Box Meetings, OHS Meeting, Notice Boards, Site Based

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				Management Plans, Client Meetings, Operations Meeting
	4.4.4: Environmental Management System Documentation			BPM-001 Business Practices Manual Management Systems Map (this document) SITE-SPECIFIC SYSTEM: Environmental Management Plan or Site-based Management Plan, Laboratory procedures and manual
	4.4.5: Document Control			F&A-001 Documents and Data Control F&A-003 Standard Presentation of Records and Documents
	4.4.6: Operational Control			DB-001 Design & Build Management DB-002 Design Management AM-005 Management of Assets SYS-008 Management of Quality, Safety and Environmental Hazards F&A-004 Selection and Evaluation of Suppliers ENV-001 Management of Waste ENV-003 Initial Review / Environmental Aspects F&A-005 Purchasing Specifications and Data SITE-SPECIFIC SYSTEM: Environmental Management Plan or Site-based Management Plan, Operations Procedures, Maintenance Procedures, Laboratory Procedures and Manual, Process Control Procedures / Technicians' Manual
	4.4.7: Emergency Preparedness and Response			ER-CMP-001 Crisis Management Plan SITE-SPECIFIC SYSTEM: Incident Management Plan
	4.5: Checking and Corrective Action			
	4.5.1: Monitoring and Measurement			SYS-003 Legal and Regulatory Requirements SYS-005 Auditing ENV-001 Management of Waste SITE-SPECIFIC SYSTEM: Laboratory Procedures and Manual, Environmental Management Plan or Site-based Management Plan, Calibration Procedures
	4.5.2: Non Conformance and Corrective and Preventive Action			SYS-006 BIF (Control of Non-Conformances and Corrective/Preventive Actions)

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
	4.5.3: Records			F&A-002 Records and Archives F&A-003 Standard Presentation of Records and Documents
	4.5.4: Environmental Management System Audit			SYS-005 Auditing
	4.6: Management Review			SYS-004 Management System Review
4. Quality Management System				
4.1: General requirements				BPM-001 Business Practices Manual
4.2: Documentation requirements				
4.2.1: General				F&A-004 Selection & Evaluation of Suppliers F&A-005 Purchasing Specifications & Data
4.2.2: Quality manual				BPM-001 Business Practices Manual
4.2.3: Control of documents				F&A-001 Documents & Data Control. F&A-003 Standard Presentation of Records and Documents. SYS-003 Legal and Regulatory Requirements
4.2.4: Control of records				F&A-002 Records and Archives. F&A-003 Standard Presentation of Records and Documents
5. Management responsibilities				All Management System
5.1: Management Commitment				BPM-001 Business Practices Manual SYS-POL-01 Quality Policy SYS-002 Objectives, Targets and Management Programs
5.2: Customer Focus				BPM-001 Business Practices Manual SITE-SPECIFIC SYSTEM: Client Meetings, Monthly Reports
5.3: Quality Policy				SYS-POL-01 Quality Policy SYS-002 Objectives, Targets and Management Programs
5.4: Planning				

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
5.4.1: Quality objectives				SYS-POL-01 Quality Policy SYS-002 Objectives, Targets and Management Programs
5.4.2: Quality Management System Planning.				SYS-001 OH&S Environmental Responsibilities, Accountabilities and Authorities OHS-028 Plants SHE Committee AM-006 Process or Plant Modification F&A-001 Documents & Data Control
5.5: Responsibility, authority and communication				
5.5.1: Responsibility and authority				BPM-001 Business Practices Manual HR-001 Recruitment of Permanent Staff HR-002 Performance Management HR-004 Induction HR-005 Training and Development
5.5.2: Management Representative				BPM-001 Business Practices Manual HR-001 Recruitment of Permanent Staff HR-002 Performance Management HR-004 Induction HR-005 Training and Development
5.5.3: Internal Communication				BPM-001 Business Practices Manual SITE-SPECIFIC SYSTEM: Tool Box Meetings, OHS Meeting, Notice Boards, Site Based Management Plans, Client Meetings, Operations Meeting
5.6: Management Review				
5.6.1: General				SYS-004 Management System Review SITE-SPECIFIC SYSTEM: Management Systems Review Meeting, Monthly Reports, Operations Meeting
5.6.2: Review input				SYS-004 Management System Review SITE-SPECIFIC SYSTEM: Management Systems Steering Committee, Monthly Reports, Operations

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				Meeting
5.6.3: Review output				SYS-004 Management System Review SITE-SPECIFIC SYSTEM: Management Systems Review Meeting, Monthly Reports, Operations Meeting
6. Resource Management				
6.1: Provision of resources				BPM-001 Business Practices Manual HR-001 Recruitment of Permanent Staff HR-002 Performance Management HR-004 Induction HR-005 Training and Development SITE-SPECIFIC SYSTEM: Capex Budget, Opex Budget
6.2: Human Resources				
6.2.1: General				BPM-001 Business Practices Manual HR-001 Recruitment of Permanent Staff HR-002 Performance Management HR-004 Induction HR-005 Training and Development
6.2.2: Competence, training and awareness				HR-002 Performance Management HR-004 Induction HR-005 Training and Development
6.3: Infrastructure				DB-001 Design & Build Management DB-002 Design Management AM-005 Management of Assets SITE-SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual.
6.4: Work Environment				DB-001 Design & Build Management DB-002 Design Management AM-005 Management of Assets All OHS Procedures

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				SITE-SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual, Site Specific Management Plans.
7. Product realisation				
7.1: Planning of product realisation				All Management System. DB-001 Design & Build Management DB-002 Design Management AM-006 Process or Plant Modification
7.2: Customer related processes				
7.2.1: Determination of requirements related to the product				BPM-001 Business Practices Manual DB-001 Design & Build Management DB-002 Design Management SITE-SPECIFIC SYSTEM: Client Contracts/Agreements
7.2.2: Review of requirements related to the product				BPM-001 Business Practices Manual SYS-004 Management System Review
7.2.3: Customer communication				BPM-001 Business Practices Manual SITE-SPECIFIC SYSTEM: Client Meetings, Monthly Reports
7.3: Design and development				
7.3.1: Design and development planning				DB-001 Design & Build Management DB-002 Design Management
7.3.2: Design and development inputs				DB-001 Design & Build Management DB-002 Design Management
7.3.3: Design and development outputs				DB-001 Design & Build Management DB-002 Design Management

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
7.3.4: Design and development review				DB-001 Design & Build Management DB-002 Design Management
7.3.5: Design and development verification				DB-001 Design & Build Management DB-002 Design Management
7.3.6: Design and development validation				DB-001 Design & Build Management DB-002 Design Management
7.3.7: Control of design and development changes				DB-001 Design & Build Management DB-002 Design Management
7.4: Purchasing				
7.4.1: Purchasing process				F&A-004 Selection and Evaluation of Suppliers
7.4.2: Purchasing information				F&A-005 Purchasing Specification and Data F&A-006 Travel Requisition
7.4.3: Verification of purchased product				SYS-005 Auditing DB-001 Design & Build Management DB-002 Design Management SITE-SPECIFIC SYSTEM: Operations Procedures, Site Specific Management Plans.
7.5: Production and service provision				
7.5.1: Control of production and service provision				BPM-001 Business Practices Manual DB-001 Design & Build Management DB-002 Design Management AM-005 Management of Assets ENV-001 Management of Waste

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				OHS-014 Protection from Solar UV Radiation All Management System SITE-SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual.
7.5.2: Validation of processes for production and service provision				DB-001 Design & Build Management DB-002 Design Management AM-005 Management of Assets SITE-SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual.
7.5.3: Identification and traceability				DB-001 Design & Build Management DB-002 Design Management AM-006 Process or Plant Modification SITE SPECIFIC SYSTEM: Operations Procedures, Laboratory Procedures and Manual.
7.5.4: Customer property				BPM-001 Business Practices Manual F&A-001 Documents and Data Control F&A-002 Records and Archives AM-005 Management of Assets SITE SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Raw Water/Effluent Testing Procedure
7.5.5: Preservation of product				BPM-001 Business Practices Manual ENV-001 Management of Waste OHS-014 Protection from Solar UV Radiation
7.6: Control of monitoring and measurement equipment				BPM-001 Business Practices Manual SITE SPECIFIC SYSTEM: Calibration Procedures, Maintenance Procedures
8. Measurement, analysis and improvement				
8.1: General				BPM-001 Business Practices Manual

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				DB-001 Design & Build Management DB-002 Design Management AM-006 Process or Plant Modification SYS-004 Management Review SITE SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual.
8.2: Monitoring and Measurement				
8.2.1: Customer satisfaction				SITE SPECIFIC SYSTEM: Operation Interface Meeting., Client Meetings, Monthly Reports
8.2.2: Internal audit				SYS-005 Auditing
8.2.3: Monitoring and measurement of processes				BPM-001 Business Practices Manual SYS-005 Auditing SITE SPECIFIC SYSTEM: When applicable
8.2.4: Monitoring and measurement of product				BPM-001 Business Practices Manual DB-001 Design & Build Management DB-002 Design Management AM-006 Process or Plant Modification SITE SPECIFIC SYSTEM: Operations Procedures, Maintenance Procedures, Process Control Procedures/Technicians' Manual, Laboratory Procedures and Manual, Site Specific Monitoring Plans and Procedures.
8.3: Control of nonconforming product				SYS-006 BIF (Control of Non-Conformances and Corrective/Preventative Actions) SITE SPECIFIC SYSTEM: Incident Management Plan, Laboratory Procedures and Manual
8.4: Analysis of data				BPM-001 Business Practices Manual SITE SPECIFIC SYSTEM: Monthly Reports, SCADA
8.5: Improvement				
8.5.1: Continual improvement				SYS-004 Management System Review
8.5.2: Corrective Action				SYS-006 BIF (Control of Non-Conformances and Corrective/Preventative Actions)

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				SITE-SPECIFIC SYSTEM: Incident Management Plan, Laboratory Procedures and Manual, Site Specific Management Plans.
8.5.3: Preventive Action				SYS-006 BIF (Control of Non-Conformances and Corrective/Preventative Actions) SITE-SPECIFIC SYSTEM: Incident Management Plan, Laboratory Procedures and Manual, Site Specific Management Plans.
		4.1: General requirements	4.1: General requirements	All management system
		4.2: OHS Policy	4.2: OHS Policy	OHS-POL-01 Health and Safety Policy
		4.3: Planning	4.3: Planning	
		4.3.1: Planning Identification of Hazards, Assessment and Control of Risks	4.3.1: Hazard Identification, Risk Assessment and Determining Controls	SYS-002 Objectives, Targets and Management Programs SYS-008 Management of Quality, Safety and Environmental Hazards
				DB-001 Design & Build Management DB-002 Design Management
		4.3.2: Legal and Other Requirements	4.3.2: Legal and Other Requirements	SYS-003 Legal and Regulatory Requirements
		4.3.3: Objectives and Targets	4.3.3: Objectives	SYS-002 Objectives, Targets and Management Programs SYS-004 Management System Review
		4.3.4: OHS Management Plans	4.3.3: Programme(s)	SYS-002 Objectives, Targets and Management Programs DB-001 Design & Build Management DB-002 Design Management
		4.4: Implementation	4.4: Implementation and Operation	
		4.4.1: Structure and Responsibility	4.4.1: Resources, Roles, Responsibility, Accountability and Authority	HR-001 Recruitment of Permanent Staff SYS-001 WHS/OH&S & Environmental Responsibilities, Accountabilities and Authorities OHS-004 Authorisation of Personnel
		4.4.2: Training and Competency	4.4.2: Competence, Training and Awareness	HR-002 Performance Management HR-004 Induction

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
				HR-005 Training and Development OHS-004 Authorisation of Personnel
		4.4.3: Consultation, Communication and Reporting	4.4.3: Communication, Consultation and Awareness	SYS-004 Management System Review SYS-008 Management of Quality, Safety and Environmental Hazards OHS-005 Incident Reporting and Investigation SITE-SPECIFIC SYSTEM: :Site SHE Committee Procedure (when available), Site Specific Management Plans
		4.4.4: Documentation	4.4.4: Documentation	BPM-001: Business Practices Manual Management Systems Map (this document) Management System Manuals and Procedures SITE-SPECIFIC SYSTEM: Procedures and manuals
		4.4.5: Document and Data Control	4.4.5: Control of Documents	F&A-001 Documents and Data Control F&A-003 Standard Presentation of Records and Documents
		4.4.6: Hazard Identification, Risk, Assessment and Control of Risks	4.4.6: Operational Control	OHS-001 Medical Assessment & Surveillance DB-001 Design & Build Management DB-002 Design Management SYS-008 Management of Quality, Safety and Environmental Hazards AM-003 HAZOP Studies F&A-004 Selection and Evaluation of Suppliers F&A-005 Purchasing Specification and Data All OHS procedures SITE-SPECIFIC SYSTEM: Chemical Handling Procedures, Operations Procedures, Risk Registers
		4.4.7: Emergency Preparedness and Response	4.4.7: Emergency Preparedness and Response	HR-010 Return to Work Program ER-CMP-001 Crisis Management Plan SITE-SPECIFIC SYSTEM: Incident Management Plan and Incident Response Procedures
		4.5: Measurement and Evaluation	4.5: Checking	
		4.5.1: Monitoring and Measurement	4.5.1: Performance Measurement and	OHS-001 Medical Assessment & Surveillance

ISO 9001:2008	ISO 14001:2004	AS/NZS 4801:2001	OHSAS 18001:2007	ADDRESSED IN SUEZ WTS DOCUMENT
			Monitoring	SYS-002 Objectives, Targets and Management Programs SYS-008 Management of Quality, Safety and Environmental Hazards OHS-005 Incident Reporting and Investigation SITE-SPECIFIC SYSTEM: Site Specific Procedures and Management Plans
		4.5.2: Incident Investigation, Corrective and Preventive Action		OHS-005 Incident Reporting and Investigation SYS-006 BIF (Control of Non-Conformance and Corrective/Preventive Actions) SITE-SPECIFIC SYSTEM: Incident Management Plan
			4.5.2: Evaluation of Compliance	SYS-003 Legal and Regulatory Requirements SYS-005 Auditing
		4.5.3: Records and Records Management		F&A-002 Records and Archives F&A-003 Standard Presentation of Records and Documents
			4.5.3 Incident Investigation, Nonconformity, Corrective Action and Preventive Action	OHS-005 Incident Reporting and Investigation SYS-006 BIF (Control of Non-Conformance and Corrective/Preventive Actions) SITE-SPECIFIC SYSTEM: Incident Management Plan
		4.5.4: OHSMS Audit		SYS-005 Auditing
			4.5.4 Control of Records	F&A-002 Records and Archives F&A-003 Standard Presentation of Records and Documents
			4.5.5 Internal Audit	SYS-005 Auditing
		4.6: Management Review	4.6: Management Review	SYS-004 Management System Review