
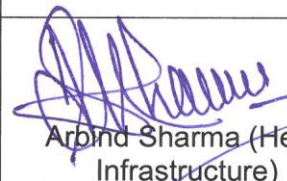






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ENVIRONMENTAL MANAGEMENT

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Document Change Note

Rev. No	Rev. Date	Comments / Changes
00	08-12-2022	New Issue
01	29-08-2025	Following section incorporated in 5.2.4 - 1. Risk Assessment, 2. Emergency Plan, 3. Legal Compliance, 4. Drills, 5. Communication, 6. Accessibility, 7. Coordination, 8. Continuous Improvement
		Incorporate clause 3.3 Applicable Regulations and standard
		Incorporate Clause 5.2.7- Non-Conformance and Corrective and Preventive action Incorporate Clause 5.2.8 Incident Reporting and Investigation.

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1 PURPOSE

The purpose of this procedure is to control of all forms of pollution and avoidance of any immediate or long-term harmful effects i.e. environmental protection and prevention of pollution, in compliance with regulatory and project specific requirements.

This environmental management procedure defines the organization, policies and principles of the environmental management system that is applied to projects handled by AMNS. Besides that, it also defines the responsibilities and authorities of those who manage, perform and verify work affecting the operation of the environmental management system.

2 SCOPE

This procedure shall apply to all AMNS project sites and related work areas including contractors to meet –

- Legal and regulatory requirements
- AMNS HSE requirements
- ISO 14001:2015 standard requirements
- AMNS HSE Policy

3 DEFINITIONS

3.1 DEFINITIONS

Continual improvement:

Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organization's HSE policy

Environment:

Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental aspect:

Element of an organization's activities, or products or service that can interact with the environment

Environmental impact:

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.

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Environmental Management System:

Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.

Environmental objective:

Overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve.

Environmental performance:

Measurable results of an organization's management of its environmental aspects

Environmental target:

Detailed performance requirement, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

Interested party:

Person or group concerned with or affected by the environmental performance of an organization.

Prevention of pollution:

Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant, in order to reduce adverse environmental impacts.

3.2 ABBREVIATIONS:

SOR	- Safety Observation Report
HSE	- Health, Safety and Environment
HSIC	- Hazardous Substance Information Card
MSDS	- Material Safety Data Sheet
COSHH	- Control of Substances Hazardous to Health
EIA	- Environmental Impact Assessment
HSEMRC	- HSE Management Review Committee
OH&S	- Occupational Health & Safety

3.3 APPLICABLE REGULATIONS & STANDARDS:

This project will adhere to all applicable national and state environmental laws, which include but are not limited to:

- The Environment (Protection) Act, 1986 and its rules.
- EIA Notification, 2006 (and its subsequent amendments).
- The Air (Prevention and Control of Pollution) Act, 1981.
- The Water (Prevention and Control of Pollution) Act, 1974.

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- The Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and modified thereafter.
- The Construction and Demolition Waste Management Rules, 2016.
- The Factories Act, 1948
- Specific standards and guidelines issued by MoEF&CC, CPCB, and GPCB.
- International Standards: ISO 14001 (Environmental Management), ISO 45001 (Occupational Health & Safety).

4 RESPONSIBILITIES

Project Head shall be responsible for overall implementation of the environmental management program at the Project Sites.

All employees are responsible for reporting environmental incidents to their supervisor or HSE department immediately.

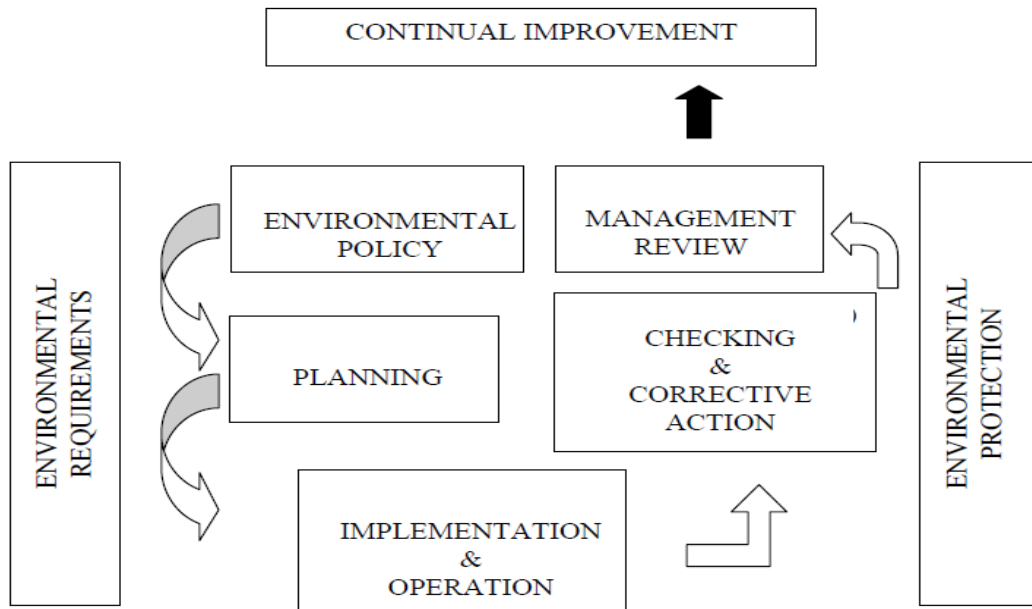
The following person(s) or job classification will be responsible for:

Environmental Incident Reporting	: Person(s) who witnesses the incident
Regulatory Notification	: Industrial Relation Officer in coordination with Project Head
Follow Up	: HSE Manager
Training	: HSE department
Record Keeping	: HSE Department

5 DESCRIPTION

5.1 ENVIRONMENTAL MANAGEMENT PROCESS MODEL

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The Environmental Management System is developed in line with company policy and commitment on protection of environment and prevention of pollution.

The environmental aspects and their impacts are identified and evaluated for significance with respect to regulatory requirements, social responsibility and business priorities.

The aspects having significant impact are then managed through setting objectives and targets. These objectives and targets are reviewed periodically with an aim for continual improvement.

The significant aspects are also managed by ensuring that personnel are aware of their roles, responsibility and authority to control the consequences.

The personnel are supported in their work by establishing operational controls and emergency response preparedness for which training and competence assessment is carried out to minimize impacts and risks.

5.2 PLANNING

5.2.1 Environmental Aspects and Impact Assessment

The environmental aspects and impacts from the project activities of AMNS are identified and evaluated for significance. The Project Head or his designate will evaluate all activities applicable to the project that may create new environmental aspects. HSE Manager shall ensure that all aspects identified are evaluated for their significance and a list of significant environmental aspects and their significant impacts are compiled in "OH& S Risk, environmental aspects and impact Assessment Register". The register shall be reviewed once in a year or whenever new processes/ equipment added or any new materials brought in to site which has significant environmental impact.

Refer to "AMNS-Project-SS-HSEM-08 - HIRAC Procedure" for risk assessment matrix and OH& S Risk, environmental aspects and impact Assessment form.

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5.2.2 Legal and regulatory requirements

Environmental legislative and regulation requirements and other codes of practices or directives applicable to the project handled by AMNS are identified, obtained, interpreted and incorporated in environmental management system/ HSE Plan.

The legal and other requirements identified shall be summarized and communicated to all personnel of AMNS through-

- Pre-employee inductions
- Notice boards
- Posters and bulletins
- Training sessions
- Regular toolbox talks
- Mass toolbox talks

5.2.3 Objectives and Targets

Upon evaluating environmental aspects and impacts, objectives and targets for each year are defined and reviewed periodically for their achievement by top management at corporate level and translated in to project specific and addressed in respective HSE Plans.

The objectives and targets shall also be communicated to relevant AMNS employees as appropriate to their role and responsibility.

5.2.4 Emergency response

The procedure “AMNS-Project-SS-HSEM-12- Emergency Management Procedure” describes the emergency scenarios in the event of incident that has potential to harm environment and the measures to mitigate consequences. The emergency preparedness and response procedures shall be tested periodically and reviewed and revised in particular after the occurrence of accidents or emergency situations.

5.2.4.1. Risk Assessment

All potential environmental emergency scenarios shall be identified through a structured risk assessment process. This includes evaluating the likelihood and severity of incidents such as chemical spills, fire, explosion, air or water pollution, and natural disasters. The risk assessment shall be documented and reviewed annually or upon significant changes in operations.

5.2.4.2. Emergency Plan

A site-specific Emergency Response Plan (ERP) shall be developed and maintained. The ERP shall include:

- Roles and responsibilities of emergency response personnel.
- Contact details of internal and external emergency services.
- Evacuation routes and assembly points.
- Procedures for containment and mitigation of environmental releases.
- Resource inventory (e.g., spill kits, fire extinguishers, PPE).

5.2.4.3. Legal Compliance

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All emergency preparedness and response activities shall comply with applicable environmental laws and regulations, including:

- The Environment (Protection) Act, 1986.
- The Factories Act, 1948.
- GPCB/CPCB guidelines for emergency preparedness.
- ISO 14001 and ISO 45001 standards.

5.2.4.4. Drills

Emergency drills shall be conducted at least Once a year to test the effectiveness of the ERP. These drills shall simulate realistic scenarios and involve all relevant personnel. Post-drill evaluations shall be documented, and corrective actions shall be implemented for any gaps identified.

5.2.4.5. Communication

Clear communication protocols shall be established for internal and external stakeholders during emergencies. This includes:

- Immediate notification to the HSE department and Project Head.
- Timely reporting to regulatory authorities as per statutory timelines.
- Use of visual and audible alarms, public address systems, and signage.

5.2.4.6. Accessibility

Emergency equipment and information shall be easily accessible at all times. This includes:

- Clearly marked emergency exits and routes.
- Unobstructed access to firefighting and spill control equipment.
- Availability of MSDS for hazardous materials.

5.2.4.7. Coordination

Coordination with external agencies such as fire departments, hospitals, and pollution control boards shall be ensured. Mutual aid agreements and joint response protocols shall be established where applicable.

5.2.4.8. Continuous Improvement

Emergency preparedness shall be continuously improved through:

- Regular review and updating of the ERP.
- Incorporation of lessons learned from drills and actual incidents.
- Feedback from employees and stakeholders.
- Integration of new technologies and best practices.

5.2.5 Monitoring and measurement

AMNS shall identify the key characteristics of project operations and activities that can have a significant impact on the environment. Performance indicators for these characteristics are defined and monitored for their achievement with an aim of continual improvement.

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Equipment used to inspect, measure, test or examine items to determine compliance or demonstrate conformance of the test parameters to specifications as part of monitoring environmental aspects are calibrated to applicable standards.

New monitoring equipment is registered and calibrated prior to release to operation for monitoring and measuring.

All environmental monitoring equipment also has to be calibrated and maintained and records of this process shall be retained until the closure of the project.

Air Quality Monitoring Program

- **Objective:** To continuously assess the ambient air quality at and around the project site and to monitor emissions from identified sources, ensuring adherence to National Ambient Air Quality Standards, November 2009 (NAAQS) and other applicable emission limits.
- **Parameters Monitored:**
 - **Ambient Air Quality:** Particulate Matter (PM10) (as per regulatory requirements and project-specific needs).
 - **DG Set Stack Emissions:** Particulate Matter (PM), NOx, SO2, CO & Noise level during operation.
- **Monitoring Frequency:**
 - **Ambient Air Quality:** Monthly, at designated locations within and around the project boundary.
 - **DG Set Stack Emissions & Noise level:** Quarterly, or as per CPCB/GPCB guidelines.
- **Monitoring Agency:**
 - All ambient air quality and stack emission monitoring shall be conducted by a **third-party, NABL-accredited laboratory** or an agency approved by the Gujarat Pollution Control Board (GPCB).
 - The selected agency shall possess the necessary expertise, equipment, and certifications to perform accurate and reliable measurements.

Emission Monitoring Plan

- **Sampling Locations:**
 - **Ambient Air Quality:** Monitoring stations will be strategically located at sensitive receptors (e.g., nearest residential areas, schools, hospitals) and within the project site boundary where maximum impact is anticipated. Specific GPS coordinates of monitoring locations shall be documented.
 - **DG Set Stack Emissions:** Sampling ports shall be provided on all DG set stacks as per CPCB norms to facilitate direct measurement of emissions.
- **Methodology:**

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- Monitoring shall be performed using validated and approved methodologies as prescribed by the Gujarat Pollution Control Board (GPCB) or equivalent national/international standards (e.g., IS standards, USEPA methods).
- Calibrated equipment shall be used for all measurements.
- **Monitoring Schedule:** A detailed annual/monthly monitoring schedule shall be prepared by the Environmental Manager/Officer in coordination with the third-party agency. This schedule will specify dates, locations, and parameters for each monitoring event.

5.2.6 Evaluation of compliance

Compliance to legal and other requirement shall be periodically evaluated and reported to top management. Non-compliances detected will be rectified as stated in 5.2.7.

5.2.7 Non-conformance and corrective & preventive action

Non-conformance, once identified, shall be investigated to identify the actual root cause of the problem. This shall form the basis for implementing the corrective and preventive action, which is necessary to prevent its recurrence. Refer to "AMNS-Project-SS-HSEM-13 - Incident notification, investigation and analysis" procedure for details on reporting requirements of environmental incidents, investigation process, root cause analysis and corrective/preventive actions.

A key part of this process involves daily site monitoring and management of environmental non-compliance as follows:

1. Daily Site Observations by Environmental Department: The Environmental Department personnel shall conduct daily site visits and inspections across all construction areas. During these visits, they will actively monitor for any deviations from the AEMP, observations of excessive air emissions, or non-compliance with environmental regulations (e.g., inadequate dust suppression, uncovered material loads, visible emissions from DG sets, insufficient green cover around the project site, or toxic material spillage which may lead to soil contamination).

2. Documentation of Non-Compliance: Any observation of non-compliance or potential environmental risk shall be immediately documented. This documentation shall include:

- Date and time of observation.
- Specific location of the non-compliance.
- A detailed description of the non-compliance (e.g., "Vehicles moving on an unpaved road without water sprinkling, resulting in a visible dust plume," or "DG set operating with black smoke exceeding permissible opacity").
- Identification of the responsible party/area (e.g., "Earthwork Contractor A," "Project Site X").
- Photographic or video evidence, if appropriate.

3. Immediate Notification and Communication to Project Heads: Observations of non-compliance will be formally communicated to the respective Project Head (or their designated representative) of the affected site/area on the same day.

- This communication shall clearly state the non-compliance, its potential environmental impact, and the need for immediate corrective action.

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- For critical non-compliances (e.g., major equipment malfunction causing significant emissions), verbal notification shall be followed by immediate written communication.

4. Implementation of Corrective Actions: Upon receiving notification, the concerned Project Head is responsible for promptly implementing the necessary corrective actions to rectify the non-compliance. Corrective actions may include, but are not limited to:

- Increasing the frequency of water sprinkling.
- Repairing or servicing malfunctioning equipment.
- Ensuring immediate covering of material loads/stockpiles.
- Properly covering raw materials and soils with tarpaulins on transporting vehicles.
- Re-training personnel on specific procedures.
- Adjusting operational procedures to minimize emissions.

5. Verification of Corrective Actions: The Environmental Department shall follow up on reported non-compliances to verify that the corrective actions have been implemented effectively, and that the non-compliance has been resolved. Verification may involve re-inspection of the site, review of records, or direct observation of improved practices.

6. Escalation Procedure: In cases where non-compliance is persistent, severe, or poses an immediate threat to the environment or human health, the issue shall be escalated to senior management (e.g., Project Executive Director) for intervention.

7. Preventive Actions: Beyond immediate corrections, the Environmental Department, in collaboration with Project Heads, shall identify and implement preventive actions to avoid the recurrence of similar non-compliances. This may involve:

- Addressing root causes (e.g., lack of awareness, equipment failure, insufficient resources).
- Revising SOPs.
- Conducting targeted training programs.
- Procuring new equipment or technology (e.g., additional water tankers, better covers).
- Enhancing supervision.

Any action taken, whether corrective or preventive, shall be effective to a degree appropriate to the magnitude of the problem and the associated risks encountered. Appropriate verification and evaluation methods shall be performed to ensure the effectiveness of all actions taken.

Both corrective and preventive actions that result in a change to the system shall be updated accordingly. All actions taken shall be reported back to the management during the HSE Management Review Committee (HSEMRC) meeting.

5.2.8 Incident Reporting and Investigation

Definition of Environmental Incident:

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- An environmental incident related to air emissions is defined as any unforeseen event or occurrence that results in, or has the potential to result in, a significant adverse impact on ambient air quality or a breach of regulatory emission limits. This includes, but is not limited to, major equipment failure leading to uncontrolled emissions, significant dust plumes affecting the surrounding community, or a regulator-identified violation.

Reporting Protocol:

- All environmental incidents shall be reported immediately to the Environmental Manager/Officer.
- The reporting of incidents shall utilize the standard "Environment Incident Report" format, as provided in **Annexure I**.
- For incidents requiring external reporting (e.g., to GPCB), the Environmental Manager/Officer shall ensure timely notification as per statutory requirements (e.g., within 24 hours).

Incident Investigation:

- All environmental incidents shall be thoroughly investigated to determine their root causes.
- An investigation team, typically comprising the Environmental Manager/Officer, Project Head, and relevant technical personnel, shall conduct the investigation.
- The investigation shall document:
 - What happened, when, and where.
 - Who was involved.
 - The immediate and underlying causes.
 - The environmental impact.
 - Recommendations for corrective and preventive actions.

Implementation of Actions from Investigation:

- Corrective and preventive actions identified during the investigation shall be assigned responsibilities and deadlines for implementation.
- Implementation effectiveness shall be monitored and verified.

Performance Improvement and Recurrence Prevention:

- Findings from incident investigations, including root causes and effective corrective/preventive actions, shall be communicated across all project sites and integrated into training programs and SOP revisions to prevent similar incidents in the future.

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6 TRAINING

All employees are trained on this procedure and made aware of their role in environmental protection and prevention of pollution and achieving the environmental objectives and targets.

Training activities shall be documented, and records shall be maintained.

7 RECORDS

Environmental records shall be established either in hard copy or electronic media and maintained to demonstrate the achievement and the effectiveness of Environmental Management System.

All records pertaining to regulatory requirements shall be kept as per the requirements, and other system compliance records shall be maintained until the completion of Project.

S. No.	Title	Maintained by	Retention period
01	OH& S Risk, environmental aspects and impact Assessment Register	HSE Department	Until completion of project
02	Incident and investigation reports	HSE Department	Until completion of project
03	Training attendance records	HSE Department	Until completion of project
04	Waste collection/ disposal records	HSE Department	Until completion of project

8 REFERENCE DOCUMENTS

AMNS/Project/SS/HSEM/04	Identification and compliance to legal & regulatory requirements
AMNS/Project/SS/HSEM/05	Training, Awareness and Competence
AMNS/Project/SS/HSEM/08	Hazard identification, risk assessment and control
AMNS/Project/SS/HSEM/12	Emergency Response Procedure
AMNS/Project/SS/HSEM/13	Incident notification, investigation and analysis
AMNSIL/PROJECT/ENV-1/SOP	Construction Site Air Emission Control
AMNSIPL/PROJECT/ENV-2/SOP	Legal, Regulatory/Statutory and Environmental Compliance for Expansion/Revamping/Modifications/Retrofitting Projects