

1.0 Purpose

This procedure describes the method for identifying and evaluating environmental aspects related to the **electroplating processes** carried out by SEEC respectively and determining the significance of these aspects. The procedure also applies to those indirect aspects arising from works carried out by SEEC's suppliers and contractors.

2.0 Scope

This procedure applies to all operations and activities, under normal conditions and reasonably foreseeable situations, in the **Factory and Facilities** of SEEC.

3.0 Reference Documents

Section 4.3.1, EMS Manual

EAR-01	Register of Environmental Aspects
LR-01	Register of Legal and Other Requirements
EP-02	Review of Legal and Other Requirements
EP-04	Control of Documents
EP-08	Control of Records

4.0 Definitions

EMS Committee	– Environmental Management System Committee
EMR	– Environmental Management Representative
SEA	– Significant Environmental Aspects

5.0 Responsibility

5.1 EMS Committee

The EMS Committee shall identify the environmental aspects of all activities, product and service of SEEC and its suppliers and contractors, and to evaluate the significance of the environmental aspects.

The member of EMS Committee / EMR shall prepare and maintain the Register of Environmental Aspects such that it contains the most up-to-date information.

5.2 Managing Director

The **Managing Director** shall review and approve the Register of Environmental Aspects.

6.0 Procedure

6.1 Basis for Aspect Identification

SEEC's environmental aspects include those direct aspects arising from their activities, products and services; those indirect aspects that can be influenced, such as arising from the activities of their suppliers and contractors working on SEEC's activities, and from customer use of product (wherever reasonably practicable). Aspects within the defined scope of the EMS with regards to resource inputs to each process / activity, the intermediate effects, and the outputs for past, present and future activities, under normal operating conditions and any reasonably foreseeable situations shall be considered e.g. planned or new developments, or new or modified activities, products and services..

6.2 Identification of Environmental Aspects

The environmental aspects of **SEEC** shall be identified with respect to its major work activities. The aspects identified from business activities and office activities are consolidated to form the Register of Environmental Aspects.

Information reviewed for aspect identification shall include but is not limited to the following:

- Work process flow and procedures
- Legal requirements / non-statutory guidance notes
- General specifications and Particular specifications;
- Design reports
- Observations in site inspections;
- Records of complaints and/or non-compliance;
- Past monitoring records; and
- Records for past management reviews and/or environmental audits.

6.3 Identification of Environmental Impacts of Aspects

The environmental impacts of each aspect shall be identified with regards to:

- Resources utilisation (including use of raw materials, energy, etc);
- Waste management;
- Air emissions;
- Water pollution;
- Noise and vibration nuisance;
- Land contamination;
- Indirect impacts caused by **SEEC**'s suppliers or contractors or customers; and
- Others : Flora and Fauna, Visual impact; Community impact, Transportation impact, Nuisance, Site Security, etc.

6.4 Significance Evaluation of Environmental Aspects

The environmental aspects shall be evaluated for their significance according to the four criteria listed in Table 1 one by one. A score of "1" or "0" will be assigned. If an environmental aspects scores "1" for a criterion, it is considered as a significant environmental aspect (SEA) and evaluation against the remaining criteria is not necessary (denoted by "-" in the Register of Environmental Aspects). If an environmental aspect scores "0" for a criterion, it shall be evaluated by the remaining criteria one by one. If an environmental aspect scores "0" for all 4 criteria, it is regarded as insignificant.

Significant Environmental Aspects shall be taken into account in establishing, implementing and maintaining the EMS, they shall be managed by operational control procedures or by establishing improvement objectives and targets.

Table 1 - Score assignment for evaluation criteria

Evaluation criteria	Conditions	Score
Legal requirement	The aspect is legally and contract regulated.	1
	The aspect is not legally regulated.	0
Environmental consequence	Expected release of pollutants of severe environmental consequence.	1
	Unexpected situation such as emergency may cause uncontrolled released of pollutants, or serious damage to flora, fauna or historical heritage.	1
	The aspect does not have potential environmental impacts of severe consequence.	0
Use of materials	Large consumption of materials with significant potential to reduce, reuse and recycle.	1
	Consumption of materials that are hazardous in nature and can be replaced by more environmentally benign alternatives.	1
	Consumption of materials that originate from environmentally sensitive sources.	1
	Consumption of materials that have little or no potential for reduce, reuse, recycling, replacement, and are not from environmentally sensitive sources.	0
Corporate concerns	SEEC has received valid, justifiable complaints for similar situations previously.	1
	The aspect concerns suppliers or contractors' activities and can potentially be influenced by SEEC.	1
	The aspect is about selection of suppliers or contractors	1
	The aspect is a corporate concern reflected in the corporate policy	1
	None of above	0

6.5 Development and Updating of the Register of Environmental Aspects

The EMS Committee shall identify SEEC's environmental aspects and evaluate their significance following steps 6.1 to 6.4. The result shall be showed in the Register of Environmental Aspects (document EAR-01). The information provided for each aspect shall include:

- The process / activity where the aspect is identified;
- A brief description of the aspect;
- The environmental impacts expected to result from the aspect;

- Score of the impacts based on the evaluation criteria;
- The control mechanism for each significant environmental aspect (e.g. operational control procedures, objectives and targets)

The member of EMS Committee shall prepare and review the Register of Environmental Aspects for approval by the **Managing Director**. The Register shall be updated :

- on a regular basis after the Management Review as necessary; and
- whenever planned or new development, or new or modified activities, products or services are introduced by **SEEC** or its contractors and suppliers.

7.0 Records

Record Description	Record Location/ Retention Responsibility	Minimum Retention Time
Register of Environmental Aspects (EAR-01)	EMR keeps the Master Copy	Two previous versions

8.0 Appendix

Nil.

Figure 1 – Workflow of Aspect Identification and Evaluation

