

Natural Retreats



Natural Retreats Cairngorm Mountain Environmental Management System

Cairngorm Mountain Scotland



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1. Terms and Definitions

Auditor: Person with the competence to conduct an audit.

Continual improvement: Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy.

Corrective action: Action to eliminate the cause of a detected nonconformity.

Document: Information and its supporting media.

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

Environmental aspect (EA): Elements of an organisation's activities or products or services that can interact with the environment.

Environmental impact: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.

Environmental management system (EMS): Part of an organisation'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 organisation sets itself to achieve.

Environmental performance: Measurable results of an organisation's management of its environmental aspects.

Environmental policy: Overall intentions and directions of an organisation related to its environmental performance as formally expressed by top management.

Environmental target: Detailed performance requirement applicable to the organisation 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 organisation.

Internal audit: Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organisation are fulfilled.

Nonconformity: Non-fulfilment of a requirement.

Organisation: Natural Retreats Cairngorm Mountain Ltd.

Preventive action: Action to eliminate the cause of a potential nonconformity.

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 pollutants or waste, in order to reduce adverse environmental impacts.

Procedure: Specified way to carry out an activity or a process.

2. General

2.1 Company Profile

Cairngorm Mountain is an all year round visitor attraction. In the winter period skiing is available using a funicular railway and tows while summer activities include walking and mountain biking. A number of premises are maintained where retail and food and beverage outlets exist, maintenance and engineering activities also occur.

Cairngorm Mountain's operations occur on a mountain environment and borders designated environmentally protected areas.

2.2 Purpose of this Manual

This Manual defines the Environmental Management System (EMS) of Natural Retreats Cairngorm Mountain Ltd.'s activities and contains:

- The Environmental Policy
- Statements of responsibility and authority
- An overview of the company's environmental procedures and controls
- The identification of the resources and training allocated to management, performance of work and verification activities including internal audit
- The appointment of the Environmental Management Representative (EMR); and
- The arrangement for periodic management reviews.

The purpose of this Manual is to use the ISO 14001:2004 as guidance to demonstrate that this EMS meets the requirements and provide direction for the implementation and operation of the EMS to all personnel including all relevant documents.

2.3 1.3 Scope of EMS

The scope of the EMS applies to the operation of an all year round visitor attraction along with its related products and services undertaken by Natural Retreats Cairngorm Mountain Ltd.

3. Policy

Natural Retreats Cairngorm Mountain Ltd

Environmental Policy

Natural Retreats Cairngorm Mountain Ltd believes that businesses are responsible for achieving good environmental practice and operating in a sustainable manner.

We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.

It is our priority to encourage our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.

To minimise environmental impacts concerning our activities, products and services, we shall:

- Comply with applicable legal requirements and other requirements to which the Company subscribes which relate to its environmental aspects
- Prevent pollution, reduce waste and minimise the consumption of resources
- Educate, train and motivate employees to carry out tasks in an environmentally responsible manner
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community
- Encourage environmental protection among suppliers and subcontractors
- As far as possible purchase products and services that do the least damage to the environment and encourage others to do the same
- Assess the environmental impact of any new processes or products we intend to introduce in advance.

The Company is committed to continual improvement of environmental performance. This Policy will be communicated to all staff, contractors and suppliers, and be available for the public.

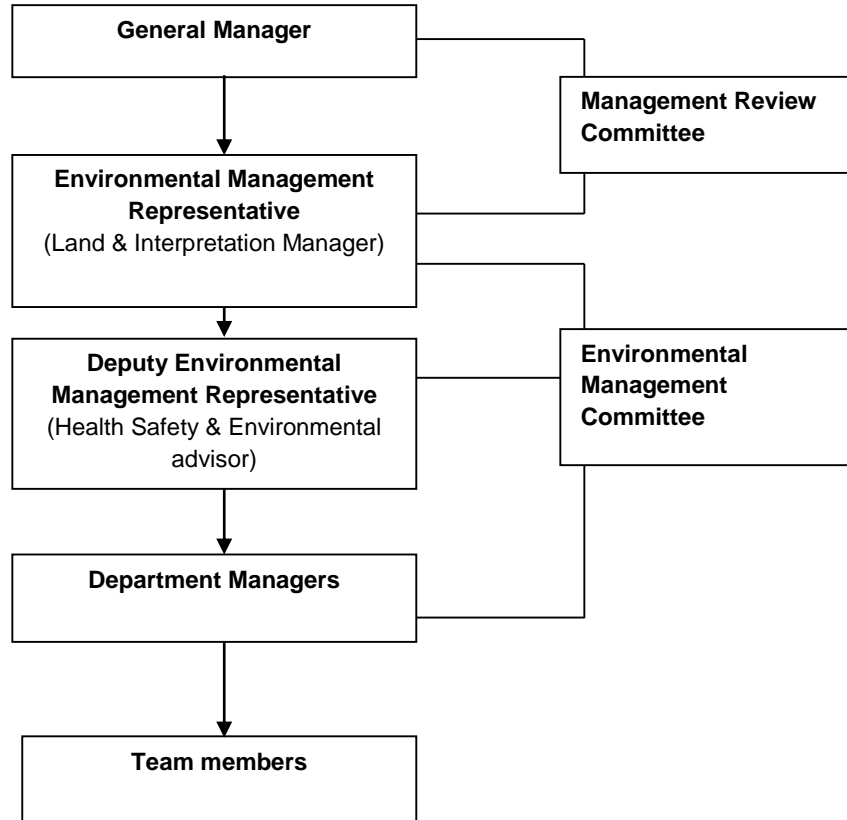
Endorsed by

Ewan Kearney
Chief Operating Officer
Natural Retreats

Date

4. Organisation

Natural Retreats Environmental Organisation Chart



4.1 Responsibility

Defined here are the roles and responsibilities of all involved in the EMS, Overall accountability remains with the Chief Operating Officer for Natural Retreats those being held responsible for Natural Retreats Cairngorm Mountain Ltd are the General Manager, Environmental Management Representative, Deputy Environmental Management Representative, Environmental Management System Committee and Management Review Committee, Line Managers and all Team members.

4.1.1 General Manager

The General Manager is responsible for:

- Endorsing the environmental policy
- Ensuring appropriate resource allocation to enable the effective operation and continual improvement of the EMS.

4.1.2 Environmental Management Representative (EMR)

The Land & Interpretation Manager is the appointed EMR and has the responsibility and authority for:

- Ensuring that EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard as a guide
- Ensuring that sufficient resources are allocated for the proper implementation of the environmental policy and the EMS
- Regularly reviewing the policy and the effectiveness of the EMS, and ensuring that the necessary changes are made
- EMR is also the Chairman of the EMS Committee and has the responsibility and authority for
- Leading the EMS Committee to establish and implement the EMS according to ISO 14001 standard as a guide, and monitoring the performance of the EMS
- Coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained;
- Handling and investigating nonconformity and ensuring corrective and preventive action has been taken to mitigate any impacts caused
- Reporting on the performance of the EMS to the top management for review and as a basis for improvement of the EMS.

The EMR, the DEMR, the EMS Committee and the Chief Operating Officer shall undertake the EMS management review annually to ensure line management commitment and integration of the EMS with business strategies and operations for its implementation and continual improvement.

4.1.3 Deputy Environmental Management Representative (DEMR)

The SHE Advisor is the appointed DEMR and has the responsibility and authority for:

- Assisting the EMR to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard as a guide
- Assuming the responsibility and action of the EMR when the EMR is unavailable.

4.1.4 Environmental Management System Committee (EMS Committee)

This committee is responsible for:

- The establishment and implementation of the EMS
- The establishment and review of objectives, targets, and programmes
- Ensuring the effective implementation of environmentally-related operational controls and programmes
- The internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff
- The review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary
- Providing leadership in the pursuit of environmental issues
- Any other EMS activities that are assigned by the EMR
- Holding quarterly meetings.

4.1.5 Management Review Committee

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the Chief Operating Officer, EMR, DEMR, and designated Line Managers. The Committee meet annually.

4.1.6 Department Managers

Department Managers are responsible for:

- Establishing controls for the identified significant environmental aspects for his/her function team / department according to procedures and instructions
- Ensuring that the EMS is properly implemented and that environmental matters are properly handled at all stages.

4.1.7 All Team Members

All employees are responsible for:

- Working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- Reporting problems or deviations associated with environmental issues and the EMS to the EMS committee via their line managers.

5. Environmental Management System Requirements

The EMS of Natural Retreats Cairngorm Mountain Ltd is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS is established in accordance with ISO 14001:2004 as guidance and is described in this section. Procedures for each component is given in the relevant Environmental Procedures (EPs) listed in Appendix A.

5.1 Environmental Management System Documents

The purposes of these EMS documents are as follows:

Environmental Policy

Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements and pollution prevention.

Environmental Management System Manual (EMS Manual)

Describes the environmental management system and outlines how the requirements of the International Standard (ISO 14001) are achieved. A cross-reference of the ISO 14001 clauses to the sections of this Manual is listed in Appendix A.

Objective(s)

The overall environmental goals that Natural Retreats Cairngorm Mountain Ltd set to achieve.

Target(s)

The set of measurable performance requirements that Natural Retreats Cairngorm Mountain Ltd establishes to achieve the objectives.

Programme(s)

The programme and schedule which Natural Retreats Cairngorm Mountain Ltd implements to achieve the objectives and targets.

Environmental Procedures (EPs)

Define the roles, responsibilities and actions to be taken to ensure that activities are performed and the EMS implemented in accordance with the environmental policy and the requirements of ISO 14001. A cross-reference of the ISO 14001 clauses to the EPs is listed in Appendix A.

Register of Environmental Aspects

Compiles the environmental aspects that are derived from the activities and services of Natural Retreats Cairngorm Mountain Ltd. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects.

Register of Legal and Other Requirements

Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to Natural Retreats Cairngorm Mountain Ltd.

Environmental Instructions (EIs)

Describe which and how activities should be performed to manage significant environmental aspects and to achieve the EMS ISO 14001 requirements.

Environmental Forms/Records

Record information for the audit trail and the assessment of environmental conditions and performance.

5.2 Environmental Policy

(ISO 14001 Standard Clause 4.2)

The environmental policy of Natural Retreats Cairngorm Mountain Ltd is included in Section 2 of this document. It outlines the environmental commitments of Natural Retreats Cairngorm Mountain Ltd with respect to its operations, activities and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of Natural Retreats Cairngorm Mountain Ltd activities, products and services has been considered. The policy is endorsed by the Chief Operating Officer and the policy shall be reviewed EMS Committee.

The policy shall stipulate the commitments of Natural Retreats Cairngorm Mountain Ltd to continually improve its environmental management and prevention of pollution. Natural Retreats Cairngorm Mountain Ltd is also committed to comply with applicable legal requirements and other requirements to which Natural Retreats Cairngorm Mountain Ltd subscribes which relate to its environmental aspects. The environmental policy shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented and communicated to all employees of Natural Retreats Cairngorm Mountain Ltd and its contractors.

This policy shall be available to the public.

5.3 Planning

Natural Retreats Cairngorm Mountain Ltd shall follow a “plan-do-check-act” process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of Natural Retreats Cairngorm Mountain Ltd.’s Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with Natural Retreats Cairngorm Mountain Ltd.’s environmental policy, Natural Retreats Cairngorm Mountain Ltd.’s objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

5.3.1 Environmental Aspects

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

Natural Retreats Cairngorm Mountain Ltd shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

Natural Retreats Cairngorm Mountain Ltd shall keep this information up-to-date.

Relevant procedure EP-01.

Identification of Environmental Aspects and Significance Evaluation.

5.3.2 Legal and Other Requirements

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects. Natural Retreats Cairngorm Mountain Ltd shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

Natural Retreats Cairngorm Mountain Ltd shall keep this information up-to-date.

Relevant procedure: EP-02.

Review of Legal and Other Requirements.

5.3.3 Objectives, Targets and Programme(s)

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within Natural Retreats Cairngorm Mountain Ltd. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, Natural Retreats Cairngorm Mountain Ltd shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

The Chief Operating Officer shall approve the objectives, targets and programmes proposed by the EMS Committee before implementation. The EMR shall ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the EMS Committee quarterly. The EMR shall lead the EMS Committee in revising the objectives, targets and programmes as necessary.

Natural Retreats Cairngorm Mountain Ltd shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EMR shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems. The EMR shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

5.4 Implementation and Operation

The implementation of the EMS requires Natural Retreats Cairngorm Mountain Ltd to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls and maintain sufficient awareness on emergency preparedness among the staff.

5.4.1 Resources, Roles, Responsibility and Authority

The General Manager of Natural Retreats Cairngorm Mountain Ltd shall commit to provide resources (including human resources and specialised skills, organisational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented and communicated in order to facilitate effective environmental management.

Natural Retreats Cairngorm Mountain Ltd has appointed the Land & Interpretation Manager as the Environmental Management Representative (EMR), and the Safety Health & Environment Advisor as the Deputy Environmental Management Representative (DEMR) for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

5.4.2 Competence, Training and Awareness

Natural Retreats Cairngorm Mountain Ltd shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience and shall retain associated records.

Natural Retreats Cairngorm Mountain Ltd will need to ensure that all people performing tasks for or on behalf of the organisation, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- The roles and responsibilities in achieving conformity with the environmental management system
- The importance of conformity with the environmental policy, the procedures and the requirements of the structured ems
- The significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- The potential consequences of departure from specified operating procedures.

Relevant procedure: EP-03.

Training.

5.4.3 Communication

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice board and is published on Team site.

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of Natural Retreats Cairngorm Mountain Ltd shall inform their Line Manager's. A designated member of EMS Committee shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy is to be made available. All internal and external enquiries / complaints / communications shall be discussed and reviewed during the EMS Committee meeting and the decision shall be recorded on meeting minutes.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g. publish an environmental report.

Relevant procedure: EP-07.

Enquiry / Complaint / Nonconformity Handling.

5.4.4 Documentation

The Environmental Management System documentation encompasses four levels as described below: The first level is the Environmental Management System Manual which includes Natural Retreats Cairngorm Mountain Ltd.'s environmental policy (specifying the principal objectives and environmental commitments of Natural Retreats Cairngorm Mountain Ltd), and a broad description of how Natural Retreats Cairngorm Mountain Ltd addresses the ISO 14001 requirements.

The EMS Manual serves as an interface to interpret the relationship between Natural Retreats Cairngorm Mountain Ltd.'s EMS and the ISO 14001 Standard. An individual document of Objectives, Targets and Programmes is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continual improvement in environmental performance.

The second level is the Environmental Procedures (EPs), which include all procedures that Natural Retreats Cairngorm Mountain Ltd shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when. Appendix A shows the relationship between various environmental procedures and the ISO 14001 Standard clauses.

Register of Environmental Aspects, and Register of Legal and Other Requirements are derived from the procedures and act as the foundation of the EMS which the company subscribed to. The third level is the Environmental Instructions (EIs), which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with Natural Retreats Cairngorm Mountain Ltd.'s operations and activities.

The fourth level is Environmental Records, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc., as defined in each Environmental Procedure and Environmental Instruction.

5.4.5 Control of Documents

The essences of EMS documentation controls are:

- They shall be reviewed, revised as necessary and approved for adequacy by authorized personnel
- That current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed
- That documents of external origin determined by the organisation to be necessary for the planning and operation of the ems are identified and their distribution controlled
- Obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- Any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.

Natural Retreats Cairngorm Mountain Ltd shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

Relevant procedure: EP-04.

Control of Documents.

5.4.6 Operational Control

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

Natural Retreats Cairngorm Mountain Ltd shall ensure that all operations and activities, carried out by Natural Retreats Cairngorm Mountain Ltd.'s employees or contractors that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. Natural Retreats Cairngorm Mountain Ltd shall influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

Relevant instruction: refer to various EI's.

5.4.7 Emergency Preparedness and Response

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

Natural Retreats Cairngorm Mountain Ltd shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

Natural Retreats Cairngorm Mountain Ltd shall also periodically test the procedure and the preparedness where practicable.

Relevant procedure: EP-05.

Environmental Emergency Preparedness and Response.

5.5 Checking

While implementing the EMS, Natural Retreats Cairngorm Mountain Ltd shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

5.5.1 Monitoring and Measurement

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

Relevant procedure: EP-06.

Environmental Monitoring and Evaluation of Compliance.

5.5.2 Evaluation of Compliance

To meet the company's commitment to compliance, Natural Retreats Cairngorm Mountain Ltd shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements (section 4.5.2.1) and other requirements (section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

Relevant procedure: EP-06.

Environmental Monitoring and Evaluation of Compliance.

5.5.3 Nonconformity, Corrective Action and Preventive Action

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- Handle and investigate nonconformity
- Take action to mitigate the impacts caused
- Initiate and complete corrective and preventive actions
- Ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered
- Record the results of corrective and prevention actions taken
- Review the effectiveness of corrective action and preventive action taken
- Implement and record any changes in the documented procedures resulting from corrective and preventive action; and natural retreats cairngorm mountain ltd shall also ensure that any necessary changes are made to environmental management documentation.

Relevant procedure: EP-07.

Enquiry / Complaint / Nonconformity Handling.

5.5.4 Control of Records

Records shall be maintained to keep track of Natural Retreats Cairngorm Mountain Ltd.'s environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard as a guide, and the results achieved.

Natural Retreats Cairngorm Mountain Ltd shall establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

Relevant procedure: EP-08.

5.5.5 Internal Audit

Natural Retreats Cairngorm Mountain Ltd shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to determine whether or not the environmental management system:

- Conforms to planned arrangements for environmental management including the requirements of ISO 14001 as a guide; and
- Has been properly implemented and maintained
- Provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

Natural Retreats Cairngorm Mountain Ltd shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.

Relevant procedure: EP-09

Internal Audit.

5.6 Management Review

The “plan-do-check-act” cycle shall require the top management of Natural Retreats Cairngorm Mountain Ltd to act and review the environmental management system periodically to ensure its suitability, adequacy and effectiveness.

Before the Review, the EMR shall schedule for the management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The Chief Operating Officer, EMR and DEMR together with the EMS Committee shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, the activities of a year round visitor attraction, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- Review of the environmental policy, objectives, targets, and programmes
- Review of legal compliance and compliance with other requirements (including contractor compliance on natural retreats cairngorm mountain ltd.'s activities)
- Environmental aspects of activities and their disclosure to public
- Findings of the internal audits
- Review of nonconformities and the status of corrective/preventive actions
- Communications from external interested parties, including complaints
- Areas for improvement with respect to environmental performance
- Adequacy of emergency preparedness and response
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects
- Identify the need for modification of the existing ems in light of the above items, and
- Follow-up action from previous management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in Natural Retreats Cairngorm Mountain Ltd.'s environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record. Maintenance of the records shall be in accordance with EP-08.

Appendix A EMS Manual and Environmental Procedures.

ISO Clause	EMS Manual Section No.	EP Ref. No.
4.1 General Requirements	4.1	–
4.2 Environmental Policy	4.2.	–
4.3 Planning	4.3	–
4.3.1 Environmental Aspects	4.3.1	EP-01
4.3.2 Legal and Other Requirements	4.3.2	EP-02
4.3.3 Objectives, Targets and Programme(s)	4.3.3	–
4.4 Implementation and Operation	4.4	–
4.4.1 Resources, Roles, Responsibility and Authority	4.4.1	–
4.4.2 Competence, Training, and Awareness	4.4.2	EP-03
4.4.3 Communication	4.4.3	–
4.4.4 Documentation	4.4.4	–
4.4.5 Control of Documents	4.4.5	EP-04
4.4.6 Operational Control	4.4.6	All EIs
4.4.7 Emergency Preparedness and Response	4.4.7	EP-05
4.5 Checking	4.5	–
4.5.1 Monitoring and Measurement	4.5.1	EP-06
4.5.2 Evaluation of Compliance	4.5.2	EP-06
4.5.3 Nonconformity, Corrective Action and Preventive Action	4.5.3	EP-07
4.5.4 Control of Records	4.5.4	EP-08
4.5.5 Internal Audit	4.5.5	EP-09
4.6 Management Review	4.6	–

Appendix B Controlled Document List

Document No.	Document/Form Name
CP-01	Environmental Policy
O&T-2014	Objectives, Targets and Programmes
EAR-01	Register of Environmental Aspects
LR-01	Register of Legal and Other Requirements
EM-01	Environmental Management System Manual
EP-01	Identification of Environmental Aspects and Significance Evaluation
EP-02	Review of Legal and Other Requirements
EP-03	Training
EP-04	Control of Documents
EP-05	Environmental Emergency Preparedness and Response
EP-06	Environmental Monitoring and Evaluation of Compliance
EP-07	Enquiry / Complaint / Nonconformity Handling
EP-08	Control of Records
EP-09	Internal Audit
EI-01	Environmental Office Practices
EI-02	Green Procurement
EI-03	Environmental Practices for Using Company's vehicle fleet
EI-04	Waste Management
EI-05	Air Pollution Control
EI-06	Water Pollution Control
EI-07	Noise Pollution Control
EI-08	Resource Conservation
EI-09	Handling and Storage of Chemicals
EI-10	Visual and light Pollution Control
EI-11	Visitor Management Plan (VMP)