



# ENVIRONMENTAL POLICY

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## 1.0 Introduction

### 1.1 Purpose and Scope

This document is the Environmental Policy for Swiftline Engineering Services Group Ltd and describes the Company Environmental Management System.

The Company Scope of Works is project management of construction projects, Swiftline Engineering Services Group services and installation / maintenance of security infrastructure. The Environmental Policy and Procedures detailed within this document apply to all Company employees and are actively supported by the Board of Directors.

The Swiftline Engineering Services Group management system integrates environmental control into the overall management strategy of the Company as well as encompassing the requirements of BS EN 14001:2004. It has been designed to improve environmental performance and by periodic review and evaluation, will provide a structured approach for the achievement of continual improvement and prevention of pollution.

### 1.2 Referenced Legislation

Swiftline Engineering Services Group Ltd are committed to comply with applicable legal requirements, a full list of Environmental Legislation as referenced within this policy and which are relevant to the Company activities can be found within the Environmental Legislation Register. As well as client/third body requirements to which the company will adhere to regarding environmental issues.

### 1.3 Revision and Distribution

The Operations Director will make arrangements for the Environmental Policy and Procedures to be reviewed on an annual basis and where appropriate will make recommendations for any modifications to the Board of Directors.

Copies of the Environmental Policy may be issued as required, to:

- Relevant regulatory and advisory organisations
- Primary suppliers
- Primary customers
- Contractors
- Upon request to members of the public and interested parties.

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## 2.0 Environmental Policy Statements

Swiftline Engineering Services Group Ltd will seek to promote the conservation and sustainable use of natural resources and to prevent environmental pollution in all its activities, with the objective to prevent the environmental impact of all our environmental aspects.

Consideration will be given at the design stage to the substitution of potential pollutants with “greener” alternatives wherever possible. Steps will be taken to prevent nuisance (i.e. smoke, dust, noise, and vibration) and any other aspects which could result in environmental impact, the potential for which will be identified during the assessment process. We will strive for continual improvement in our environmental performance and plans.

We are committed to managing our activities and those of our supply chain that impact on the environment in a responsible manner and the following policy guidelines show the principal commitments we have set ourselves:

- Ensure this policy will be available for all employees, and that, they in turn are trained and have an understanding of their responsibilities in relation to the environmental policy.
- Encourage the implementation of environmental good practices by all people within the organisation.
- Minimise waste and pollution, by operating effective waste management procedures in-line with Duty of Care, whilst striving towards achieving the waste diversion from landfill annual target.
- Avoid use, wherever possible, of environmentally damaging substances, materials, and processes.
- Ensure requirements of all applicable environmental legislation and where practicable exceed these requirements.
- Monitor progress on a regular basis to identify strengths and areas for improvement and to highlight actions required to prevent potential deficiencies.
- Prevent the environmental impacts of our current activities and wherever practicable, the level of harmful emissions.
- Take account of environmental issues when placing orders with suppliers and sub-contractors.
- Reduce use of natural resources such as energy, water and raw materials, and maximise the efficient use of such resources, reuse rather than dispose whenever possible, promote recycling and the use of recycled materials.

The above environmental objectives will be annually reviewed by the Director with Environmental Responsibilities and the Board of Directors.

This policy will be enforced by managerial vigilance and shall be subject to regular auditing and review.

Signed:



Director

Date: 6<sup>th</sup> January 2022

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## 2.2 Sustainability Policy Statement

Swiftline Engineering Services Group Ltd aim to develop procedures to implement sustainable practices that help to ensure the wise use of all resources within a framework in which economic, social and environmental factors are integrated

Targets and objectives will be implemented as part of the continuous development process required for the ISO14001 certification. To accomplish these targets/objectives we endeavour to:

- Make sustainability integral to the delivery process in all our construction projects
- Encourage innovation in sustainable development
- Work with clients to pursue, promote and develop sustainable business solutions
- Promote sustainable practices
- Ensure our staff are actively involved in implementation of this policy and in reviewing sustainability performance.

In meeting these targets/objectives Swiftline Engineering Services Group Ltd will:

- Comply with all current and future legislation
- Consider and evaluate, taking action where necessary, to continuously improve environmental practices
- Fund and work on community projects that achieve sustainable goals

Audit environmental and sustainability performance on a regular basis, thereby endeavouring to implement any audit findings. Provide ongoing education for all our staff on environmental issues relevant to the company

- Support and encourage initiative recommendations and approaches to the implementation of sustainability strategies
- Use resources efficiently to minimise the usage of water, energy and other consumables in the office environment
- Design a strategy that moves towards minimising carbon emissions in all business operations
- Strive to prevent unnecessary pollution within the scope of our business activities
- Develop a strategy for the business to move towards sustainable procurement of all goods and services used in its operations
- Review this policy annually.

Signed:



Director

Date: 6<sup>th</sup> January 2021

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## 2.3 Energy Policy Statement

Swiftline Engineering Services Group Ltd is committed to responsible energy management as part of an overall environmental strategy. By efficient management of energy, the company aims to minimise:

- Energy use
- Energy costs
- Environmental impact of harmful emissions
- Depletion of fossil fuels.

As a minimum Swiftline Engineering Services Group Ltd will comply with all applicable legal requirements that relate to energy aspects.

We also commit to:

- Increase energy efficiency at our offices
- Reduce our energy consumption through a formal programme of energy and carbon saving measures
- Review our energy performance regularly and seek continual improvement
- Review our energy objectives and targets annually
- Make available adequate resources and information to achieve our energy objectives
- Purchase, where practicable energy efficient products, services and designs for energy performance improvement.
- Communicate this policy to all our staff, ensure they understand the energy impacts of their job and how to minimise these
- Encourage energy efficiency and good energy and carbon management in our supply chain
- Implement energy improvement projects identified within the company environmental strategy
- Operate our energy management systems in accordance with ISO 50001

To this end Swiftline Engineering Services Group Ltd will provide senior level commitment, an appropriate management structure and cost effective resources to achieve these standards which will contribute to environmental improvement and long term sustainability. This policy will be reviewed on an annual basis.

Kevin McLoughlin

Director



Signed:

Date 6<sup>th</sup> January 2021

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## 2.4 Timber Procurement Policy

Swiftline Engineering Services Group Ltd recognise their responsibility to ensure that all timber and timber containing products, for example doors, windows, roof trusses, flooring, fencing, furniture and plywood used on their sites and premises are derived from legal sources and from sustainably managed areas.

Swiftline Engineering Services Group Ltd therefore, will only purchase, either directly or indirectly (as part of a sub-contract package), timber or timber containing products from a supplier or manufacturer who can clearly show that they comply with the requirements of the European Timber Regulations No 995/2010 (EUTR) and can confirm that the timber they are supplying to Swiftline Building Services Group Ltd is not from an illegal source.

Swiftline Engineering Services Group Ltd also require that the timber has a chain of custody certificate from an independent certification scheme, such as that run by the Programme for the Endorsement of Forest Certification (PEFC) or the Forestry Stewardship Council (FSC).

If as a result of this policy, Swiftline Engineering Services Group Ltd are unable to procure the timber specified by a client, designer or architect, Swiftline Engineering Services Group Ltd shall make it know to them and request that the appropriate change be made to the specification. This may include proposing an alternative species, which has the appropriate certification.

Furthermore, where practicable, Swiftline Engineering Services Group Ltd will look to use reclaimed timber or other similar products made from recycled timber, such as chipboard.

This Policy will be reviewed on an annual basis and updated as required.

This policy is to be read in conjunction with the Swiftline Engineering Services Group Ltd Management System and associated policies.

Kevin McLoughlin

Director



Signed:

Date 6<sup>th</sup> January 2021

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### 3.0 Responsibilities

These responsibilities are to be read in conjunction with, and to be considered part of the Environmental Policy of Swiftline Engineering Services Group Ltd.

- Chain of command

- Line of communication

Kevin McLoughlin – Managing Director

Dean Cronin - Director

Darryl Morgan - Safety, Health & Environmental Advisor

Project Managers

Sub-contractors

Employees

Office Manager

Office Staff

### 3.1 Directors

The Directors are individually and collectively responsible for showing leadership in implementing and promoting a positive environmental approach throughout the business, and for implementing management systems to provide this. The Directors shall ensure that all decisions made at Board level reflect the environmental intentions as articulated in this Environmental Policy and that they recognise the importance of engaging the active participation of all Managers and employees to improve this.

The Board of Directors shall ensure that:

- The Environmental Policy is positively pursued and implemented at subordinate management levels.

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- They are familiar with the requirements of the Environment Act and other relevant legislation and require that they are observed on site.
- The Environmental Policy is reviewed annually or more frequently if required to comply with changing legislation, regulations or other circumstances and approve such changes as are necessary following recommendations from the Safety, Health & Environmental Manager.
- There is the provision for adequate funds and facilities to meet the requirements of the Environmental Policy.
- All levels of personnel receive adequate Environmental Training.
- They attend Directors Safety, Health & Environmental Meetings.
- Environmental performance is monitored and recommendations for improvements are put forward for incorporation into working practice.
- Encouragement and support is provided for the Safety, Health & Environmental Committees.
- The Board of Directors has overall responsibility for actively promoting an environmental culture, for promoting the appropriate management systems to deliver it and for monitoring performance.

### 3.2 Managing Director

The Managing Director will ensure that:

- The Company's policy for the prevention of pollution, damage, etc is initiated.
- A Director responsible for environment is appointed.
- All levels of management and employees understand the requirements placed upon them by this Policy.
- The policy is effectively administered and monitored.
- The relevant legislation is compiled within all the Company's areas of operation.
- Sound working practices are observed.
- Liaison with external environmental organisations is instigated.
- Pertinent information is distributed throughout the company.

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- Adequate funds are made available to meet the requirements of the policy.
- The appropriate insurance cover is provided and maintained.
- Provision is made at all meetings, including board meetings, for discussing environmental aspects.
- A statement on the environment is included in the Company's annual report.
- Board members accept their individual roles in providing environmental leadership within the Company.
- Any non-environment activities witnessed during visits to company locations are corrected.

### 3.3 Director with Environmental Responsibilities

The Director with Environmental responsibilities will ensure that:

- He understands the Company's Environmental Policy and appreciates his role in the environmental aspect of the Company.
- The board accepts formally and publicly its collective role in providing environmental leadership within the Company.
- The board understands that all decisions that may impact on the environment need to reflect its environmental intentions.
- The board recognises its role in engaging the active participation of workers in improving the environment.

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- He takes full responsibility for ensuring that the board is kept informed of relevant environmental risk management issues within the Company.
- The Board is advised on resources needed at project level to provide and maintain the effectiveness of the Environmental Policy and the Environmental Management System.
- The Environment is an agenda item at all board meetings.
- Procedures are put in place to ensure that the policy is effectively administered and monitored.
- That all environmental incidents are correctly reported and recorded and that action is taken to prevent a recurrence of the incident.
- Liaison with external environmental organisations is ongoing.
- Pertinent information is distributed throughout the Company.
- Procedures are put in place to ensure that work is carried out as planned and the relevant legislation is complied with.
- He chairs the regular meetings of the company Safety, Health & Environment Committee.
- He takes part in Site Tours paying attention to the environmental aspects / impacts with the Safety, Health & Environmental Manager.
- Any non-environment activities witnessed during visits to company locations are corrected.

### 3.4 Operation Directors

The Operation Directors will ensure that:

- They understand the Company's Environmental Policy and appreciate the allocated responsibilities.
- Tenders are adequate to cover environmental methods of work.
- The Project Environmental Plan (PEP) is fully developed prior to commencement of site works / activities.
- Disciplinary / corrective procedures are implemented, in consultation with the Project Managers and Human Resources, if any employee or contractor is careless with regard to the environment.

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- Tenders are adequate to allow for meeting the requirements of the Company Policy.
- Only competent contractors are employed to carry out works on behalf of the Company.
- All levels of employees receive adequate and appropriate Environmental Training.
- Any non-environment activities witnessed during visits to company locations are corrected.

### 3.5 Safety, Health & Environmental Advisor

The Safety, Health & Environmental Advisor responsibilities are to ensure that:

- They understand the Company's Environmental Policy and appreciates the allocated responsibilities.
- The Environmental Policy and relevant documentation, is reviewed and updated as required.
- The Company's Policy for the prevention of pollution, damage, etc is sustained.
- All levels of management and employees are made aware of requirements placed upon them by this Policy.
- The policy is effectively administered, monitored and that necessary alterations are made to the policy to reflect changes in legislation or Company development.
- All incidents are correctly reported and recorded and that action is taken to prevent a recurrence of the incident.
- Liaison with external Environmental organisations is instigated.
- Pertinent information is distributed throughout the Company.
- Procedures are put in place to ensure that the policy is effectively administered and monitored.
- Statistical information is maintained and reported to the Directors as required.
- Any non-environment activities witnessed during visits to company locations are corrected.
- He accompanies the Directors on Site Tours paying attention to the environmental aspects / impacts.
- Carry out site inspections, as requested
- Provide written reports for the Site management teams and divisional team leaders / Directors subsequent to the inspections.
- Provide an advisory service relating to all aspects of the environment at work.
- By arrangement, provide an incident investigation service and liaise with the relevant enforcing authority.
- Attend meetings regarding the environment, as time allows.
- Provide Environmental Training to both management and staff providing he/she is competent to do so.
- Any non-environment activities witnessed during visits to company locations are corrected.
- Investigate incidents and when necessary prepare reports on same.

### 3.7 Project Managers

The Project Managers Environmental responsibilities are to ensure that:

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- Sites are organised that work is carried out to the required standard with the minimum risk of pollution / damage, etc.
- They understand the requirements of the applicable legislation and the Company's Environmental Policy.
- The legal requirements are observed on site and that all registers, records and reports are in order.
- All employees are given precise instructions on their responsibilities for the correct working methods.
- All employees / visitors are made aware of the environmental emergency procedures.
- Provisions are made for the delivery and stacking of materials to avoid unnecessary environmental damage.
- The work environment is kept tidy.
- The Project Environmental Plan (PEP) is fully developed prior to commencement of site works / activities.
- Tenders are adequate to allow for meeting the requirements of statutory provisions and the Company Policy.
- Only competent contractors are employed to carry out works on behalf of the Company.
- All levels of employees receive adequate and appropriate training in their tasks.
- Ensure that contractors coordinate and communicate their activities to avoid any potential damage to the environment.
- All hazardous materials are correctly marked, stored, handled and used.
- Co-operate with the Safety, Health & Environmental Advisor and act on his recommendations.
- Disciplinary action is taken against employees who contravene the requirements of the legislation or the Company's Environmental Policy.
- Work is carried out in accordance with the relevant method statement and environmental risk assessment.
- Any non-environment activities witnessed during visits to company locations are corrected.

### 3.8 Subcontractors

(Labour only Subcontractors are, for the purposes of the environment, deemed to be employees).

Shall:

- Ensure all work is being carried out in accordance with the relevant statutory provisions regarding the working and surrounding environment.
- Stop any non-environment activities witnessed during visits to company locations are corrected.
- Any incident / damage caused by subcontractors' employees must be reported immediately to a Company site representative.

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- Subcontractor’s employees must comply with any reasonable environmental instructions given by the company’s site representative.
- Any materials or substance brought on site which has fire, explosion or environmental risks must be used and stored in accordance with statutory requirements and codes of practice and that information must be provided to any other person who may be affected by their use. Assessment of risk associated with any substance or process hazardous to health which will be used on the site must be provided to the company before work commences.
- Subcontractors are to ensure that workplaces are kept tidy and free from debris, waste materials, etc. and are cleared as work proceeds.
- A detailed method statement and environmental risk assessment will be required from subcontractors carrying out work activities that create a significant risk to the environment. The method statement must be submitted to management within the Company before work begins and copies made available on site so that those undertaking the work are aware of its content.
- The subcontractors’ senior site representatives shall attend environmental meetings as they are called by the Principal Contractor or Contractor.

### 3.9 Operatives

The Operatives must ensure that they:

- Are aware of the Company’s Environmental Policy and appreciate the allocated responsibilities.
- Use the correct tools and equipment for the task.
- Use the emergency response equipment provided.
- Report all defects in tools, plant, equipment and materials, or any obvious environmental impacts.
- Report any non-environment activities witnessed during visits to company locations are corrected.
- Do not endanger the environment through their actions or failures to act.
- Avoid improvisation.
- Warn new employees of known environmental impacts.
- Refrain from horseplay.
- Co-operate with the Company on all aspects of the environment.
- Work in accordance with the relevant method statement and environmental risk assessment.

### 3.10 Office Managers

The Office Managers must ensure that:

- They understand the Company’s Environmental Policy and appreciate the allocated responsibilities.
- All employees / visitors are made aware of the environmental emergency procedures.
- The Environmental Policy is effectively implemented in all functions under their control.
- Responsibilities are correctly assigned and accepted.

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- Any non-environment activities witnessed during office locations are stopped and corrected.

### 3.11 Office Staff

The Office Staff must ensure that they:

- Understand the Company’s Environmental Policy and appreciate the allocated responsibilities.
- Use the equipment for the task.
- Report all defects in equipment and materials, or any obvious environmental impacts.
- Do not endanger the environmental through their actions or failures to act.
- Avoid improvisation.
- Warn new employees of known environmental impacts.
- Refrain from horseplay.
- Co-operate with the Company on all aspects the environment.
- Stop any non-environment activities witnessed during office locations are stopped and corrected.
- Comply with the requirements of the Company’s Environmental Policy.

## 4.0 Arrangements

This section contains the arrangements for specific Environmental aspects encountered by the Company’s works / activities.

### 4.1 Noise

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Whilst the operations of Swiftline Building Services Group Ltd do not normally create a nuisance, it is recognised that activities such as out-of-hours working could generate a noise at an unsociable hour and could therefore lead to issues such as:

- annoy / upset neighbours
- disturb wildlife / natural heritage
- cause health risks to site staff
- cost the Company money in fines and delays if prosecuted.

The Local Authority can stop works or issue a Section 60 Notice if the Company are found to be making too much noise or causing other nuisance.

Noise monitoring will be undertaken whenever necessary and the findings recorded to ensure that noise levels at site boundaries and the boundaries of neighbouring premises do not exceed those laid down in the planning documents. Operations that may cause nuisance noise will be planned in advance and plant selection will form an important part of the planning process.

In addition, our team will embrace best practice with regards to noise minimisation, which will include all or some of the following:

- All construction plant and equipment will comply with EU noise emission limits.
- Plant will be serviced regularly to minimise adverse noise impacts.
- All vehicles and mechanical plant used for the purpose of the works will be fitted with effective exhaust silencers and maintained in good efficient working order.
- Selection of inherently quiet plant where appropriate. All major compressors will be ‘sound reduced’ models fitted with properly lined and sealed acoustic covers which will be kept closed whenever the machines are in use and all ancillary pneumatic percussive tools will be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Machines in intermittent use will be shut down in the intervening periods between works or throttled down to a minimum.
- Plant and equipment such as flat-bed lorries, skips and chutes will be lined with noise attenuating materials. Materials will be handled with care and be placed, not dropped. Materials will be delivered during normal working hours.
- Plant reversing near dwellings have banksmen in place of ‘beepers’ or the audible warning system is to be switched to the minimum setting required by the HSE, with use of tannoy systems only when necessary.
- All ancillary plant such as generators, compressors and pumps will be positioned so as to cause minimum noise disturbance, i.e. furthest from receptors or behind close boarded noise barriers, if necessary, acoustic enclosures and/or shielding will be provided.
- Where practical, noise barriers, close in to construction works, when working in the vicinity of neighbouring properties, will be provided. This will provide additional mitigation for the short-term significant construction noise effects at these properties.

## Liaising with the Community

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Community liaison is the key to increasing community tolerance to noise. The local community and residents are to be informed of any noisy works that are to be carried out including specific time frames. Discuss with them in advance what aspects of noisy working are planned and implement remedies that will therefore not impact programme. Consider agreeing to a shutdown at particularly sensitive times, for example halt noisy works at lunchtimes to appease restaurant and pub-owners. Through good relations, the potential for complaints or civil claims in the long term may be reduced. It is especially important to avoid unexpected early starts in the morning.

### Training

Instruction and training will be provided to Swiftline employees required to work in premises or with plant, which is likely to result in exposure to noise levels above the First Action Level.

- First Action Level 80 dB (A) daily personal exposure and a peak value of 135 dB (A)
- Second Action Level 85 dB (A) or Peak Action level of 137 dB (A) peak sound pressure

Further information with regard to Noise is contained within the Swiftline Health & Safety Policy

### 4.2 Vibration

Swiftline Building Services Group Ltd recognise that care is needed to ensure that vibration levels from the Company’s activities do not get to such a level where damage is done to buildings, equipment or wildlife, or puts neighbours or workers health and safety at risk.

Best practice should be utilised at all times, and on-going monitoring undertaken. Where it is deemed that vibration may pose an environmental risk, this should be fully investigated by the Project/Site Manager and Environmental Manager.

The following measures shall be used to reduce the magnitude and/or frequency of vibration caused by particular site works, and could be used to avoid excess vibration and hence risk to nearby structures:

- Use of machinery/equipment that creates high frequency vibration rather than low frequency vibrations. High frequency vibrations travel less distance than low frequency. Check with manufacturers for the vibration frequency emitted by equipment.
- Use heavy bases rather than light bases as they minimise the induced vibration levels.
- If working in an area of fluctuating groundwater levels (i.e. adjacent to coastal areas), undertake activity during low tide when the groundwater levels may be lower.

Vibration can also have adverse health effects on workers; vibration can permanently alter the flow of blood around the body. If areas of your body are not receiving a good blood supply, they can be damaged permanently.

### 4.3 Archaeology and Heritage

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The operations of Swiftline Building Services Group Ltd do not normally involve areas of archaeology and / or national heritage, but when encountered, it is recognised that care must be taken to ensure that there is no damage during works activities.

- Once damaged or destroyed archaeological remains are lost forever
- If remains are damaged or enough care is not taken to ensure they are protected, prosecution and possible imprisonment could occur.

The Site Manager is not expected to be an archaeological expert but must do the following:

- follow the contractual obligations, e.g. enabling attendance and/or access by professional archaeologists
- protect known archaeological and heritage sites
- report any significant finds arising during construction
- identify any contractual obligations and conditions that may be attached to the planning permission.

Key issues include:

#### **Sources of information on archaeology**

Depending on the project's nature and location, work may have been carried out to investigate the archaeology of the site during the planning stage; this work may be a useful source of information about the site. It is generally the client's responsibility to ensure that sufficient investigation has been undertaken to satisfy planning requirements (these are identified in local and national planning policies). However, this responsibility may transfer to the contractor in a design and build scheme.

#### **Preservation**

Where nationally important archaeological remains (whether they are scheduled or not) are affected by a proposed development, the emphasis is on preserving them. If preservation in situ is not feasible, an archaeological excavation for the purposes of preservation by record may be an acceptable alternative.

#### **Planning permission**

When applying for planning permission, clients may be advised by the Local Planning Authority to commission a desk-based archaeological assessment report as supporting documentation to the

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planning application. This report will review the archaeological potential of the site, assess the impact of the proposed scheme and propose a mitigation strategy.

### Site investigations

If there is not enough information to decide how to proceed with the site, an evaluation (archaeological site investigation which may include trial pits/trenches, geophysical surveys, boreholes/auguring, air photography, etc) may be proposed.

The following points shall be considered before carrying out works activities:

- Works that are located close to a site of archaeological or cultural significance can have a damaging impact. For example, vibration could cause cracking and subsidence in listed buildings; access roads could disturb historic areas
- Highlight the potential for significant effects on such buildings/ monuments to site staff and identify control measures before starting work on site
- Be aware that dewatering works can cause draw down of water from adjacent archaeological sites that may be well preserved because they are waterlogged. Dewatering may also cause differential settlement
- Removing a skeleton - Under the Burials Act 1857 it is necessary to obtain a licence from the Home Office to disinter any human burials. The licence is normally issued with conditions regarding the removal and disposal of such remains by an archaeologist

Certain finds are treasure e.g. coins and other objects over 300 years old. You must report all finds of treasure to the coroner for the district in which they are found either within 14 days after the day on which you made the find or within 14 days after the day on which you realised that the find might be treasure.

Whether or not known archaeological or historical features have been identified prior to start of works activities, there is still the potential for unexpected finds to be uncovered during works. Materials to look out for during excavation works include:

- burnt or blackened material
- brick or tile fragments
- coins
- pottery or bone fragments
- skeletons
- timber joists or post holes
- brick or stone foundations
- in filled ditches.

The following process shall be followed if artefacts or historical features are identified during works:

- stop work immediately in the area
- mark the area to avoid further disturbance

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- protect the find by fencing/blocking it off
- contact Site Manager who will inform the Safety, Health and Environmental Department.

If addressed at the right time and in the right way finds may not necessarily affect the progress of the works. With the right advice the delay might be much less than any statutory period.

The Site Manager should contact the Safety, Health & Environmental Department, who will contact the Local Authority or County Council, if any remains are found, who may want to involve the heritage bodies. It may be necessary to obtain separate Scheduled Ancient Monument consent before continuing work.

#### 4.4 Releases to Air

Part III of the Environmental Protection Act 1990 enables Local Authorities and individuals to take action to secure the abatement of a nuisance. Nuisance can include:

- dust
- smoke
- fumes
- odours, etc.

Normal Swiftline Building Services Group Ltd operations do not create significant releases to air. The main activities that effect air pollution are the operation of the heating the Swiftline Offices / site offices, dust, emissions and odours arising from site works activities. The impact of these is minimised by using modern, well-maintained vehicles and having boiler and other plant maintained as prescribed by manufacturers.

Dust, emissions and odours arising from a site can cause many adverse health, environmental and economic impacts:

- emissions to air can seriously affect the health of site staff and neighbours
- dust and emissions can harm local wildlife and pollute watercourses. They can be unsightly, odorous and the effects can take years to reverse
- both of the above can lead to fines or imprisonment which can increase project costs and halt construction.

With dust, emissions and odour there are usually no imposed standards to be met for a particular contract. Regulators generally only become involved once problems have been created and complaints received.

Swiftline recognise that there are potential sources of dust emissions during works activities, such as:

- Site clearance
- On site earth moving operations, site levelling, cut and fill, etc
- Vehicle movements over haul roads
- Vehicle movements on site during dry periods

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- Wind blowing across the site during dry periods
- Stockpiling of excavated materials
- Cutting and grinding
- Accidental spillage and loss of load from vehicles carrying loose material
- Deep excavations

Prevailing winds are specifically important when considering dust emissions. The speed of winds can determine the dispersion of dust; high winds can increase the initial generation of dust, in addition to carrying the dust over greater distances.

The following preventative measures to control dust, smoke, fumes and odours shall be implemented by the site management team to significantly reduce the potential for release to the air:

### Traffic routes

- Select suitable traffic routes away from sensitive areas if possible
- Pave heavily used areas, or use geo-textiles
- Provide a length of paved road before the exit from the site
- Reduce the width of traffic routes (whilst still allowing two-way traffic) to minimise surface area from which dust may be produced
- Sweep paved access roads (whilst still allowing two-way traffic) and public roads regularly using a vacuum sweeper
- Limit vehicle speeds - the slower the vehicles the less the dust generation
- Ensure plant use a wheel wash prior to re-joining surrounding public roads
- Damp down and ensure that any associated run off is properly controlled.
- Demolition
- Use enclosed chutes for dropping to ground level, demolition materials that have the potential to cause dust and regularly dampen the chutes
- The use of mobile plant for crushing materials such as bricks, tiles and concrete is covered by the EPA 1990
- Locate crushing plant away from sensitive sites - consider siting within buildings (e.g. buildings within the site that will not be demolished or those to be demolished last).

### Plant

- Clean the wheels of vehicles leaving the site (wheel wash) so that mud is not spread on surrounding roads - dry mud turns to dust
- Ensure that exhausts do not discharge directly at the ground.
- Earthworks and excavations

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- Re-vegetate or seal temporary or completed earthworks as soon as possible
- Keep earthworks damp - try to programme to avoid exceptionally dry weather.
- Materials handling and storage
- Locate stockpiles of fine grained material out of the wind (or provide wind breaks) to minimise the potential for dust generation
- Keep the stockpiles to the minimum practicable height and use gentle slopes
- Compact and bind stockpile surfaces (in extreme cases)
- Re-vegetate long-term stockpiles
- Minimise the storage time of materials on site
- Store materials away from the site boundary and downwind of sensitive areas
- Ensure that all dust-generating materials transported to and from site are covered by tarpaulin
- Minimise the height of fall of materials
- Avoid spillage, and clean up as soon as possible
- Damp down and ensure that any associated run off is properly controlled.

### **Cutting/grinding/grouting/packing**

- Minimise cutting and grinding on site
- On cutters and saws, use equipment and techniques such as dust extractors to minimise dust. Consider a wet cutting saw or use vacuum extraction
- Spray water during cutting of paving slabs to minimise dust and ensure that any associated run off is properly controlled.
- Preventing emissions and odours
- Keep vehicles and plant used on site well maintained and regularly serviced. Ensure that all vehicles used by contractors comply with MOT emissions standards at all times
- Control deliveries to site, to minimise queuing
- Make sure that engines are switched off when they are not in use (particularly important in summer near buildings that do not have air conditioning)
- Control staff car parking to minimise queuing and switch off engines when vehicles are not in use.
- Keep refuelling areas away from the public
- Use covered containers for organic waste and remove frequently
- Remove organic waste (e.g. weeds and other vegetation) before it begins to decompose
- Store fuels and chemicals and other dangerous substances in the appropriate manner
- Take account of the wind conditions when arranging activities that are likely to emit aerosols, fumes, odours and smoke
- Position site toilets away from public areas
- Use pre-agreed traffic routes
- Minimise queuing by controlling deliveries to site
- Keep site vehicles and plant well maintained and regularly serviced
- Ensure that vehicles comply with MOT emissions standards

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- Do not burn any waste on site – strictly prohibited
- Use covered containers for wastes and empty frequently
- Take account of the wind conditions when arranging activities that are likely to emit aerosols, fumes, odours and smoke.

Specific action should be taken to prevent the build-up of potentially harmful emissions in the internal environment. If necessary, an occupational hygiene monitoring process shall be undertaken, as well as an appropriate environmental risk assessment.

#### 4.5 Releases to Water

Normal Swiftline Building Services Group Ltd operations do not produce releases to water. Where any potential release to water is identified, an assessment shall be made of any environmental risk and recorded incorporating appropriate controls to eliminate the release and so minimise environmental impacts.

Swiftline recognise that the majority of pollution incidents are avoidable and careful planning can reduce the risk of pollution. Most of the measures needed to prevent pollution cost very little, especially if they are included at the planning stage. In contrast, the costs of cleaning up a pollution incident can be very high. Moreover, pollution prevention measures may offer substantial benefits, such as fewer site accidents and a reduced risk of prosecution for environmental offences.

To reduce the risk of releases to water Swiftline adopt the following practices:

- Before starting works surveys are carried to establish the existing water quality and water levels around site
- Underground pipes and storage tanks are identified on service drawings. Avoidance of disturbing pipes, particularly those containing gas (yellow) or foul water (brown/black) or diesel is of high importance. Tanks that require to be moved shall be emptied prior to removal and the contents disposed of appropriately
- Regular inspections of all discharges, drainage systems, collection ditches, lagoons, interceptors and watercourses shall be made to ensure that they are in good order
- Services shall be protected before tracking plant over them to ensure that there is no damage to drains and sewers caused.
- Identify unknown liquids or material by sampling, analysis and description
- Store oils, fuels and chemicals where they will be protected and are away from watercourses and drains
- Store hazardous liquids in bunded areas
- Ensure pipe valves are secure
- Provide appropriate site security
- Always ensure refuelling is supervised
- Seal off or remove abandoned drains
- Use drip trays underneath mobile plant when stationary
- Keep roads and hard standings clean

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- Stop uncontrolled water entering or leaving excavations
- Control surface water runoff from earthworks
- Provide sumps in excavations
- Produce emergency response plans
- Isolate/bund/cover stockpiled contaminated material
- Site spoil heaps and stockpiles away from streams and drainage systems.

## Site Drainage

On most sites, it is likely that there will be two types of drain:

1. Surface Water Drain (Blue) - designed to carry uncontaminated rainwater directly to a local stream, river or soak away. Nothing, which could cause pollution, (including silt water) should enter the surface water drains.

2. Foul Water Drain (Black / Red) - carries contaminated wastewater to treatment facilities. It may be possible to discharge site effluent to foul sewer, provided the approval of the Water Company / Authority (Sewerage Undertaker) has been received.

Drains on site shall be identified either by colour coding on the ground or identification on the project emergency plan.

All fuel, oil and chemical storage must be stored on an impervious base within a bund, secured and located at least 10 metres away from any watercourse or drain. Integrally bunded (double skinned) tanks should be located and operated as carefully and prudently as tanks of the single skin design.

Bowsers and drums should be securely stored in a bunded area away from watercourses and drains. Leaking or empty drums should be removed from site immediately and disposed of via a licensed waste disposal contractor.

The risk of spilling fuel is greatest during refuelling of plant. Refuelling mobile plant shall only take place within the designated refuelling area, (an impermeable surface away from any drains or watercourses). Diesel pumps and similar equipment shall be placed on drip trays to collect minor spillages.

If a release to water does occur it is Company procedure to follow the following process:

- Report spills to Site Manager and the Safety, Health & Environmental Department
- Identify source of pollution and stop flow
- Avoid the spillage spreading
- Get emergency response equipment
- Block off drains
- Shovel contaminated sand or earth into sacks or skips and dispose of appropriately.

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Following clean-up, an incident report must be submitted to the SH&E Department so that the Company can learn from what happened and if necessary put further control measures in place for future projects.

Further Guidance with regard to Releases to Water can be found as follows:

- Pollution Prevention Guidelines – Guidelines to assist in the development of site-specific pollution incident response plans to prevent and mitigate damage to the water environment caused by accidents such as spillages and fires.

#### 4.6 Waste

Swiftline recognise that the definition to best describe waste is: “Any substance or object, which the holder discards, intends to discard or is required to discard” and that generally a substance or object is not a waste if:

- A product is being used again for the same purpose for which it was conceived
- Passes the criteria of being a by-product, e.g. recovered within factory (i.e. saw mill residues)
- Passes the criteria of ‘ceasing to be a waste’ e.g. fully recovered product (i.e. recycled products).

Wastes have the potential to cause severe environmental damage if not correctly managed. Waste handling and disposal is a heavily regulated activity in the UK, and it is vital that Swiftline Building Services Group Ltd manage any waste generated in a legally compliant manner as breaches of legal obligations can result in prosecution.

Any commercial, industry or hazardous substance or object meeting the above definition of waste is termed ‘Controlled Waste’ and therefore shall comply with Waste Management Legislation (refer to the Environmental Legislation Register (HSDOC323) to view the current full list of Waste Legislation).

##### 4.6.1 Duty of Care

The Environmental Protection Act imposes a Duty of Care on anyone who has a responsibility for Controlled Waste to ensure that it is managed properly and recovered or disposed of safely. The duty applies to any person who:

- produces
- imports
- carries
- keeps
- treats
- disposes
- of such waste, or as a broker, has control of it.
- Under the Duty of Care, Swiftline site management team shall ensure that :
  - waste is securely contained in such a way as to avoid it escaping into the environment
  - waste is transferred only to someone authorised to carry or manage it
  - appropriate records and transfer notes are kept

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- appropriate measures are taken to ensure that others involved in the handling and disposal of the waste do so in accordance with the Law.

Breach of the Duty of Care is an offence, with a penalty of an unlimited fine (or a prison sentence) if convicted on indictment.

The Duty of Care stipulates that the holder of waste must take all reasonable steps to prevent its escape. Containing waste appropriately during storage and transportation depends on the nature of the waste and its disposal route. To comply with the Duty the Swiftline site management team shall ensure that:

- waste is not kept in a corroded or worn container
- the container is secure so as to prevent accidental spillage or leakage
- waste is kept in such a way as to prevent it falling while in storage or while it is being transported
- waste is protected from scavenging by people and animals.

The waste created on site can be significantly reduced if reused or recycled. The amount of waste can itself be reduced by careful storage, transport and handling of materials.

The Company apply the Waste Management Hierarchy (as shown below) when transferring waste and sign a declaration on the Waste Transfer / Consignment Note to show compliance with this, as outlined in the Waste Regulations.

#### 4.6.2 Waste Management Hierarchy

The hierarchy sets out, in order of priority, the Waste Management options to be considered:

1. Prevention
2. Preparing for reuse
3. Recycling
4. Recovery, e.g. energy recovery
5. Disposal

The Company's site waste should be divided into separate waste streams (segregated) regardless of the size of the site by use of numerous skips / wheelie bins, etc, as it is important to know what type of wastes are being dealt with, to ensure effective management.

Environmental legislation should be complied with concerning the storage, handling, transport and disposal of waste. Refer to the Environmental Legislation Register (HSDOC323) for the current applicable legislation.

Without proper planning, packaging can become a real problem on a construction site. It takes time and energy to store and segregate the large amount of cardboard, paper, and plastics used to wrap

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materials. To make the task easier, as a company we think ahead, and plan by considering the following:

- materials should be kept wrapped to ensure they are kept in good condition and therefore avoid unnecessary waste by unwrapping them only when you need them
- avoid double handling, separate and store the waste packaging immediately after unwrapping. Do not leave it around on site as it will deteriorate and cause litter problems
- many suppliers are now prepared to collect their own packaging for recycling, so talk to your suppliers. If they are not happy to do this, ask them why not. Remember the more pressure that is put on suppliers to reuse or recycle their packaging, the more they will have to take notice and the easier our jobs will be
- wherever possible try to purchase materials with recycled packaging. Ask regular suppliers if they know of any products with a recycled content
- if a site has a large volume of cardboard or paper waste it is well worth considering hiring a compactor to reduce the volume. It is then a possibility for the baled packaging waste to be sold, or when ordering further materials, ask suppliers if they will collect their own packaging.

Handling waste badly will cost time, money and effort. It costs money to buy the materials, to store the waste on site, to transport it from site, and to dispose of it. Landfill is costly due to waste disposed to landfill being subject to Landfill Tax, as outlined in the Landfill Directive. The Landfill Tax is increasing annually and should be avoided wherever possible to reduce project costs and environmental impacts.

There are two bands of Landfill Tax:

1. active - waste is subject to a higher rate than inactive
2. inactive – waste is subject to a lesser rate than active

If these are mixed together, the higher rate of tax will be charged on the whole load, so segregating waste saves money.

To reduce the amount of waste going to landfill it is important to look at waste as a resource. Many materials that go to landfill could be successfully reused or recycled.

For example:

- Concrete – Recycle for use as aggregate in new concrete or as unbound aggregate in fill
- Excavation spoil – Recycle for use as fill or reuse for landscaping
- Topsoil – Reuse for landscaping
- Timber – Reuse for shuttering / hoardings and recycle for chipboard
- Metals – Reuse and recycle
- Architectural features – Reuse
- Clay, concrete pipes, tiles, block & bricks – Reuse on site or recycle for use as fill.
- Packaging & plastics – Recycle (ask the supplier).

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If waste is to be disposed, under the Duty of Care, waste holders / producers are obliged to ensure that waste is only to be transported by an authorised person / body.

An Authorised Person can be a:

- Registered or Exempt Waste Carrier - It is an offence for anyone carrying waste for profit or as part of a profit-making activity not to be registered with the EA / SEPA (charities and voluntary organisations are exempt from registration)
- Local Authority - Some commercial wastes can be collected via the public waste collection system.
- Before transferring waste, the Carrier's certificate of registration should be checked – copies of the certificate are only valid if they have been provided by the EA / SEPA, who hold registers of all Authorised Waste Carriers. Before selecting a Waste Carrier, it should be checked that the Carrier is the holder of an appropriate Waste Management Licence, which allows that type and quantity of waste to be handled and is the relevant tier:
  - Upper Tier – 'Controlled Waste' (demolition, construction, hazardous)
  - Lower Tier – Animals by-products, waste from mines & quarries, waste from agricultural premises.

Waste can be taken to a transfer station, a licensed landfill (although should be avoided wherever possible) or an exempt site. Waste Carriers must have an Upper Tier registration which lasts for three years, to carry 'Controlled Waste' such as Demolition and Construction and Hazardous waste.

In the case of repeated transfers, checks on Waste Carriers, additional to the initial review, need only be made whenever the description, source or destination of the waste changes.

#### 4.6.3 Waste Transfer / Consignment Notes

Under the Duty of Care, Waste Holders are required to keep records of the wastes they produce and transfer, and also to complete, sign and keep Waste Transfer / Consignment Notes.

A Waste Transfer Note should be completed whenever waste is handed over to an Authorised Waste Carrier and should be signed by all parties. The Waste Transfer Note details from whom and to whom the waste has been transferred, the category of Authorised Person (Waste Carrier) to whom the waste has been consigned, relevant licence numbers, time, place and date of transfer, the quantity of waste, how it is packed, waste description and relevant European Waste Code (EWC) and SIC Code. The Transfer Notes should be fully completed prior to the waste being transferred from site.

In the case of repeated transfers and where such transfers involve transporting of the same type of waste to the same Authorised Person, a Waste Transfer Note need not be completed on every transfer. In such circumstances, it is acceptable to complete a note periodically (at least annually) – it should be ensured that no deviation from the original transfer details take place.

The description of the waste on the Waste Transfer Note should provide the Waste Carrier with enough information to ensure its safe management. What constitutes an appropriate written description depends on the nature of the waste – if the waste does not cause any special problems in

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handling / treatment, then a simple description based on the source or name of the waste is generally adequate; otherwise a fuller description is required which includes mention of the special problems and any chemical / physical analysis.

All Waste Transfer Notes should be appropriately filed and must be kept for at least two years. They should be made available to the Authorities on request.

To manage waste effectively and efficiently it is important to allocate sufficient space and resources in advance. To plan Waste Management, it is helpful to know what type and quantities of wastes are generated on site. This information may be obtained either by monitoring wastes on site or by drawing on previous experience - bearing in mind that improvements to Waste Management practices will probably reduce the volume requiring disposal.

The Site Manager (or a representative) shall carry out waste audits at regular intervals to look at:

- the quantities of raw material wastage
- the quantities of waste of each type generated
- the way in which wastes are being handled and stored
- the costs of disposal for different types of wastes.

Carrying out audits will help to show how well Waste Management initiatives are working on site.

It is commonly accepted that an extra 5 to 10% of materials should be ordered to allow for site wastage through damage, spillage, over-supply and vandalism. These figures could be reduced by avoiding:

- over-ordering
- ordering standard lengths not the lengths required
- ordering for delivery at the wrong time
- damage during unloading
- delivery to inappropriate areas of site
- accepting incorrect deliveries, specification or quantity
- exceeding shelf lives
- damage or contamination from incorrect storage
- loss, theft and vandalism
- damage or spillage through incorrect or repetitive handling.
- delivering the wrong materials to the workplace.

Pollution of waste streams shall be minimised by the correct and safe storage of waste:

- segregate different types of waste as they are generated
- mark waste containers clearly with their intended contents and the European Waste Code (EWC)
- use containers suitable for their contents
- dispose of different wastes in the correct containers
- check condition of waste containers before use

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- place containers in impervious bunded areas
- ensure that containers are securely covered
- prevent damage to materials during storage.

The Company are a Waste Producer and are legally responsible for ensuring that disposal of material is carried out correctly. When wastes are being transported from site:

- check that the Waste Carrier’s registration document is valid and the appropriate waste tier (Upper or Lower)
- check that a copy of the Waste Carrier’s registration document is on site
- ensure the Waste Carrier is authorised to carry the type of waste for disposal
- complete Waste Transfer / Consignment Notes accurately and in full
- ensure that the Waste Hierarchy Declaration is signed to provide evidence that the hierarchy has been applied
- keep copies of all Waste Transfer / Consignment Notes of waste sent off site.

#### 4.6.4 Hazardous Waste

Swiftline use the following definition with regard to Hazardous Waste:

‘A substance or object that may be harmful to human health or the environment’.

Examples of Hazardous waste includes:

- Asbestos / Asbestos Contaminated Materials (ACM’s)
- Oils (except edible oils) e.g. cooking oil ☒ Chemicals, e.g. brake fluid and printer toner
- Electrical equipment containing hazardous components (such as cathode ray tubes or lead solder)
- Fluorescent light tubes and energy-saving light bulbs
- Refrigerators containing ozone-depleting substances
- Lead-acid batteries
- Solvents e.g. aerosols
- Pesticides

Hazardous waste is considered dangerous or difficult to keep, treat or dispose of. It is waste that displays hazardous properties, such as being oxidising, flammable, toxic, corrosive or carcinogenic.

The Hazardous Waste (England and Wales) Regulations regulate the management of hazardous waste and impose procedures that add to those already required under the Duty of Care.

The Environmental Agency tracks the movement of Hazardous Waste through a Waste Consignment Note system. This ensures that waste is managed responsibly from where it is produced until it reaches an Authorised recovery or disposal facility.

All Waste Consignment Notes shall be appropriately filed and must be kept for at least three years, and made available to the Authorities on request.

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All Hazardous Waste is to be stored and transported with the correct packaging and labelling. Swiftline premises / sites that generate 500kg or more Hazardous Waste within a 12 month period, must register with the Environmental Agency before allowing Hazardous Waste to leave the location. The Environmental Agency will issue a unique registration code, which is valid for 12 months from registration.

Premises / sites may be exempt from registering if they:

- produce or hold less than 500kg of Hazardous Waste in any 12-month period
- is an office, used for the collection of Waste Electrical and Electronic Equipment (WEEE)
- use a registered Waste Carrier (or one exempt from being registered) to remove Hazardous Waste from where it is produced

Exempt sites may require a generic exemption number which can be acquired by contacting the SH&E Department.

Hazardous Waste shall be stored as follows:

- store hazardous wastes safely and securely in containers and label them correctly to prevent pollution
- avoid mixing hazardous and non-hazardous wastes to save creating large quantities of hazardous wastes that will raise disposal costs
- avoid mixing different types of hazardous wastes - unless it is known that mixing is harmless and will have no adverse effects on the subsequent management of the waste
- keep liquid hazardous waste in a dedicated area, with a bund to contain spills and leaks
- regularly check storage areas for leaks, deteriorating containers or other potential risks
- display written instructions for storing and disposing of each type of hazardous waste
- identify an appropriate disposal route for hazardous wastes
- maintain an inventory of the hazardous waste kept on premises. site, and where they are stored – this will assist the emergency services to deal with any incident effectively and safely
- store the documentation for the transport of hazardous wastes safely. An assessment of any potential risks posed by any Hazardous Substances that are stored on premises / site, including Hazardous Waste, shall be carried out including steps to control those risks. It can be expensive to dispose of Hazardous Waste, and it is likely to become more costly in the future. It therefore makes good business sense to reduce the amount of Hazardous Waste that the Company produces. The following should be considered to reduce Hazardous Waste:
  - ☐ choose non-hazardous or less hazardous alternatives for materials. Even small reductions in use of hazardous materials can make a big impact on Waste Management costs
  - ☐ improve the efficiency of processes to reduce the quantity of materials that are used and cut down on waste
  - ☐ introduce more effective quality control procedures to reduce the number of defective products that have to be thrown away
  - ☐ recover materials that are used and discarded. Some of these may be re-used on site, others can be sent off site for recycling, treatment or recovery. It is important to investigate this
  - ☐ change the design of your products or processes to eliminate the use of hazardous materials. You will also save money because you will not need to use a

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specialist disposal regime to separate waste to prevent contamination and making more waste hazardous.

#### 4.6.6 Waste Electrical & Electronic Equipment (WEEE)

The Company ensures that the disposal of its Waste Electrical and Electronic Equipment (WEEE) is managed in-line with the requirements of the WEEE Regulations. The WEEE Regulations aim to reduce the amount of this waste going to landfill and increase recovery and recycling rates.

There are certain requirements for the Company to adhere to under the WEEE Regulations relating to:

- separate collection, disposal and recycling
- standards for its treatment at authorised facilities
- collection, recycling and recovery targets

All businesses that use Electrical and Electronic Equipment (EEE) must comply with the WEEE Regulations. The regulations came into force on 2 January 2007 and there are several categories of WEEE that apply to the Company:

- IT and telecommunications equipment
- Lighting equipment
- Electrical and electronic tools
- Monitoring and control equipment

The WEEE Regulations apply to EEE in the above categories with a voltage of up to 1000 volts AC or up to 1500 volts DC.

The equipment covered by the WEEE Regulations fall into the following categories:

- large household appliances (fridges, radiators and air conditioning appliances)
- small household appliances (sewing machines, toasters and clocks)
- IT and telecommunications equipment (computers and their accessories, calculators and phones)
- consumer equipment (TVs, radios and musical instruments)
- lighting equipment (fluorescent lamps and non-household luminaires)
- electrical and electronic tools (drills, electric welding equipment and lawnmowers)
- monitoring and control instruments (smoke detectors, thermostats and other instruments used in industrial installations)
- automatic dispensers (drinks and food)
- display equipment to cooling appliances containing refrigerants
- gas discharge lamps WEEE includes equipment that has a wind-up or solar mechanism, or that runs on batteries.

However, on their own, solar panels, solar panel systems and batteries are currently not covered by the WEEE Regulations. If the EEE was bought before 13 August 2005, the waste is known as 'historic

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WEEE'. If the equipment is being replaced, the producer of the replacement equipment must take the unwanted item if it is requested, even if they are not the original manufacturer. If the equipment is not being replaced, there is the obligation to ensure that the Waste WEEE is disposed of in accordance with the Duty of Care and Hazardous Waste Legislation (please refer to the Environmental Legislation Register (HSDOC323) for further guidance) by ensuring that the WEEE is removed from site by a WEEE Licensed Waste Carrier and that a Waste Transfer Note (WTN) detailing the WEEE removal is signed and filed. If the EEE was purchased after 13 August 2005, the waste is known as 'non-historic WEEE'. A bar underneath the crossed-out wheeled bin symbol indicates that the WEEE is non-historic. The EEE producer is responsible for financing the treatment, reprocessing and disposal of the equipment unless both parties agree to an alternative arrangement.

If the EEE is leased / rented, the provider of the equipment will normally be responsible for disposing of it. When new EEE is purchased attention should be made to the WEEE registration number of the equipment producer. Use this registration number when contacting the producer for disposal, when the EEE is no longer of use and therefore becomes WEEE. The producer's compliance scheme is responsible for the WEEE. The original producer can give you information on the take-back system available. The EEE suppliers / retailers can dispose of business WEEE for you, but they may charge for this service. If the EEE producer refuses to take responsibility for your waste, contact the Safety, Health and Environmental Department for further guidance.

Before any new equipment is purchased, ask the following questions:

- Is the new product really needed?
- Could the existing unit be repaired?
- Can the existing device be upgraded?
- Could refurbished equipment be purchased from another business? If new equipment must be purchase, look for a product that:
  - has been designed for easy recycling
  - uses resources efficiently, e.g. it has a low energy rating
  - has a low impact on the environment, e.g. it is made from recycled materials

#### 4.7 Contaminated Land

It is recognised by the Company that if contamination is likely to be encountered, the construction contract should define the methods of dealing with it. The contract will usually refer to the guidance issued by statutory authorities on how to deal with contamination.

Ground contamination may result in the following problems:

- health and safety impacts on staff and surrounding community through exposure to contaminants
- liability for the cost of disposal or remediation of contamination (depending on contract conditions)
- liability for costs arising from unexpected spreading or making existing contamination worse
- delays to the programme through unexpected or accidental contamination

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- pollution of groundwater and surface water courses
- pollution of surrounding land.

There are two key requirements in managing ground contamination:

1. Do not cause it or spread it
2. Deal with it appropriately.

The following practices shall be followed by site management to ensure that contamination is not caused or spread:

- do not stockpile contaminated soil unless it cannot be avoided. If it is necessary, stockpile only on a hard-standing area to prevent contamination of underlying ground. It may be necessary to cover over stockpile material, either to prevent windblown dust or to prevent ingress of rainwater
- control surface drainage from stockpiled area. Water draining from a stockpile may be contaminated and need controlled, off-site, disposal
- prevent the spread of contaminated dust
- be careful when handling, storing and using oils and chemicals.

During boring, digging, excavating and similar operations, observe the uncovered ground and watch out for visual signs of contamination. The release of noxious fumes (petrol, oils, solvents, chemical residues) and smells may also indicate contamination (e.g. a smell of bad eggs may mean that hydrogen sulphide contamination is present).

The visual signs of ground contamination are:

- discoloured soil (e.g. chemical residues)
- fibrous texture to the soil (e.g. asbestos)
- presence of foreign objects (e.g. chemical/oil containers)
- evidence of previous soil workings
- evidence of underground structures and tanks
- existence of waste pits
- made ground (i.e. artificial ground where ground level is raised by man’s activities and not due to a natural cause)
- old drain runs and contamination within buildings; tanks, flues etc
- topsoil adjacent to motorways can be contaminated by traffic emissions.

Covering up problems permanently does not get rid of them! When contamination is suspected do the following:

- Stop work immediately seal off the area
- Report the discovery to the Site Manager. The site manager should seek advice from the Safety, Health and Environmental Department.

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If asbestos is uncovered, re-cover it temporarily to prevent its release to the atmosphere. If there is a risk of spreading contaminated dust, temporarily cover the source or dampen it down.

#### 4.8 Energy

The Company recognise that its activities contribute towards energy consumption and that if managed effectively and efficiently the amount of energy consumed can be reduced resulting in the company producing:

- lower utility bill costs
- a decreased carbon footprint
- an improvement towards the environment
- an increased environmental corporate image.

Swiftline Building Services Group Ltd energy targets are displayed on the Swiftline Management System and reviewed by the Safety, Health and Environment (SH&E) Department and the Director with SH&E responsibilities on an annual basis.

In an attempt to achieve the energy targets set, every site (including the Swiftline Building Services Group Ltd offices) should appoint an 'energy champion', whose responsibility it is to plan, generate and carry out energy saving measures (such as turning off lights when not required, switching off electrical equipment when not in use, etc) whilst also monitoring the site energy use.

The figures generated through the monitoring process are used to investigate the amount of energy consumed during off peak / on peak times and the difference between energy consumed during long shut down periods (Christmas holiday period) and normal shutdown (weekends) to analyse the findings and implement any changes required / deemed necessary (i.e. alter air conditioning timer to ensure that air conditioning only operates during working hours / days).

The I.T Department of Swiftline Building Services Group Ltd purchase energy efficient electrical equipment, to reduce the company energy consumption and CO<sup>2</sup> emissions. When purchasing electrical equipment, it is company procedure to investigate the smallest product that fits the requirements, due to larger products of the same type generally consuming more electricity. It is also good practice for the product to bear the EU energy label which rates the equipment on an energy efficiency scale and shows how much energy they consume, as well as looking for all electrical I.T equipment to display the Energy Saving Trust Recommended label, the Ecolabel or the Energy Star and TCO labels.

Posters are displayed and stickers placed on electrical items in the offices (including site offices), to remind everyone to switch off items that are not in use.

#### 4.9 Lighting

Whilst the operations of the Company do not normally create a nuisance, it is recognised that activities such as out-of-hours working could generate lighting at an unsociable hour and could therefore lead to issues such as:

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- annoy / upset neighbours
- disturb wildlife
- cost the Company money in fines and delays if prosecuted.

Construction in a residential area can also upset local people with antisocial lighting practice, which again can result in a fine and earn the contractor a bad reputation. Bad lighting practice can have adverse effects on wildlife and humans alike. Bad use of construction lighting can upset wildlife breeding habits for example by disorientating spawning salmon which can lead to heavy fines.

To ensure that lighting used on site does not cause a nuisance the following shall be implemented:

- All construction site lighting fixtures must be full cut-off or directionally shielded fixtures that are aimed and controlled so the directed light is substantially confined to the object intended to be illuminated
- Frosted light bulbs must be used to light the 10-foot outermost perimeter area of the interiors of the buildings under construction, which contain 5 or more storeys
- Temporary lighting should not create unnecessary glare to pedestrians and motorists
- The construction areas adjacent to walkways or roadways should be well lit and clearly defined at all times to ensure the safety of motorists and pedestrians
- Any temporary detours of vehicles or pedestrians around a construction site should be clearly visible at all times
- Construction area fences and barricades located near existing roadways or walkways should be well lit to help define the limits of construction for motorists and pedestrians
- Temporary walkways, roads and parking lots should be illuminated to the same intensity
- Avoid casting shadows on surrounding footpaths and roads by the site hoarding
- Lighting should be located and directed so that it does not cause undue intrusion to adjacent residential properties or distraction to passing motorists.

#### 4.10 Ecology

The law protects certain species of plant and animal. If the Company break these laws then fines and other associated costs and possibly a prison sentence, will be the result. However, a more commercial impact is likely to result from bad publicity and the bad reputation that may follow.

The Company recognise that its construction activities can take place whilst minimising harm to wildlife and if it's done properly, it can enhance wildlife as well as the reputations of those involved.

People like wildlife and that includes people who work for the Swiftline Building Services Group Ltd and their families. They are not happy if they think their Company or colleagues are behaving irresponsibly towards wildlife. Local people may get very upset if their local plants and animals are being threatened with damage or destruction in any way. Once an ecosystem's balance has been upset, it may not be able to recover.

All of the above makes it clear that when you have a site to work on that has any wildlife interest, everyone involved in the developments, design and construction processes need to be aware of their

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roles and responsibilities. They need to know what that interest is, where it is to be found and what they should and should not do in order to ensure that the law is complied with and good practice is followed.

Being pro-active in the conservation of wildlife is supported by the Company and is a relatively low cost when compared to getting it wrong and can enhance the business case for the construction industry and the buildings and works it creates.

Wildlife and natural features are essential to the quality of life and a healthy environment. Destroying wildlife, even by accident can result in:

- prosecution, the fine for harming a great crested newt can reach into thousands of pounds
- the loss of public support
- the loss of credibility in the workplace, a company with a bad record for destroying wildlife is not attractive to prospective clients.

Protecting the environment around us has many benefits for the present and the future and for you in the construction industry.

Construction works can attract protected species. Sand stockpiles can become a nesting site for sand martins. Spoil heaps can be colonised by badgers, particularly if the surrounding water table is high. Be aware of this when moving materials.

- Disturbance, particularly during the construction phase of a development, disturbance due to the increased human presence or from noise pollution may have a detrimental effect on animals, preventing them from breeding successfully or from feeding in the area. So, you need to ensure that the most sensitive areas of the site are known and recognised by all employees and, where possible, ensure that potentially disturbing activities are kept well clear of such areas - especially during the breeding season. It is illegal to disturb some species of animal when they are breeding
- Don't forget the supply chain! Materials, products and services, and the way they have been sourced and procured, may have a dramatic effect on wildlife resources elsewhere in the UK or abroad
- Introducing pest species or causing them to spread. Not all species of plant or animal are considered desirable (this is where terms such as increasing biodiversity come unstuck, and enhancing biodiversity is probably the better term).
- Insensitive landscape design and implementation can be ecologically damaging, and can lead to further wildlife degradation in the local environment.

To ensure that the Company maintains high levels of ecology whilst also carrying out and completing projects the following shall be followed:

- Determine if the client or partners has identified and designated ecological sites or protected species.
- Before works, identify and fence off any sensitive areas and make staff aware.

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- Plan appropriate transport routes.
- Consider schedule of works in relation to wildlife breeding or nesting periods.
- Where possible establish close working relationships with nature conservation bodies and with local environmental groups for advice.
- Plan and design replace habitats and wildlife destroyed or removed.

Offences are punishable by fines of up to £5000 per offence. Penalties may also include prison sentences of up to six months. In addition, any vehicle used to commit the offence may be forfeited. Either the company and/or individuals may be held liable. Penalties may be higher where dealt with in a Crown Court.

Where trees are present within the construction site consideration shall be given as follows:

- Check if any trees on site are protected by a tree preservation order
- Keep vehicles and plant away from trees
- Put up temporary fencing to mark out the protected area around the tree
- Do not cut or damage roots greater than 25mm in diameter within the protected area
- Cut roots with a clean hand saw
- Wrap damp sacking around any exposed roots until ready for backfilling
- Compact the backfill tightly around the tree roots
- Do not store spoil or building materials within the protected area.

Releases to Water is covered previously within this Environmental Policy but there are aspects to consider with regard to water as part of ecology:

- Place a protective bund around ponds
- Consider monitoring water levels during works in particular during dewatering
- Ensure run-off is directed from sensitive areas.

An Environmental Aspect / Impact Register should be completed by the Project / Site Manager(s) to assess the likely impacts on ecology from the project activities, and what can be done to maximise opportunities for enhancement and avoid or minimise any adverse impacts.

Where disturbance or destruction of habitats is unavoidable as part of the development ensure that there is sufficient mitigation or compensation within the development to at least retain or replace some of the interest either on site or within the local area i.e. habitat translocation (process of moving soils with their vegetation and any animals that remain associated with them, in order to rescue habitats that would otherwise be lost).

The law does not protect many plants and animals in the UK and yet they can still be very important at the local or even regional scale and some have been in long-term decline. Securing the advice of the Safety, Health and Environmental Department about what is and is not important is a key aspect of working with wildlife on development projects.

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Certain Company installation activities may impact on sensitive ecosystems or archaeological features, which require particular consideration and may have regulatory protection.

The following procedures shall be followed in order to protect these features:

- Sensitive or protected ecosystems, such as Sites of Specific Scientific Interest (SSSI's), National Parks,
- Tree Protection Orders (TPO's) and National Trust sites, should be identified prior to the commencement of the project so that special working procedures can be implemented as required.
- Consult English Nature or the company's environmental consultants to seek advice on how to deal with any environmentally sensitive areas or issues.
- If any hedgerow removal is required, then permission must be obtained from the relevant enforcing authority during the project design stage.
- Prior approval for work of any kind on a listed building must be gained from the local planning authority.
- Local sensitive areas and any TPO's on the site should be fenced off and signed prior to work commencing. TPO's must be fenced to create a buffer zone to a minimum size of the tree canopy.
- Any sensitive features should be regularly inspected by a nominated member of staff to ensure that they're adverse impacts to these features. See Site Inspection Form attached as Appendix C.

## 5.0 Site Preparation and Commencement

Much can be done by the Company's Site Management at the start of a new project, to develop good relationships with the persons and businesses in the area. If care is taken to involve all sections of the Community, Local Authority, Police force, Statutory Bodies and others, work will almost invariably progress more smoothly as the development progresses. The following shall be followed by the Site Management Team to ensure high levels of site preparation:

- Consider the environmental importance of the site and the impact that changes will have on the Local Environment and complete the Project Environmental Plan (PEP) and the Annex to the PEP the Environmental Aspect / Impact Register
- Check the boundaries of the site to ensure that these are clearly defined so that there is little risk of disputes arising in the future.
- Make personal contact with persons living or working in adjoining properties, or others in the Community e.g. schools, residents, etc.
- Consider the impact of noisy machinery or plant in the area and where necessary obtain advice from the sub-contractors / Safety, Health and Environmental Department about the best way of handling this.
- If work is very close or adjacent to public footpaths, rights of way or adjoining property, contact the Local Authority Representative and agree suitable means of protection, warning signs and lighting.

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- Consider carefully requirements for fencing the working area to exclude children who may be resident nearby.
- Storage areas for solid materials or liquids should be located away from watercourses and provided with appropriate containment and security.
- Ensure that all clean water drains are located and protected from pollution including silt. Site drainage plans should be consulted during site set up to ensure these drains are protected from any sources of contamination.

## 6.0 Housekeeping

It is recognised by Swiftline that poor levels of housekeeping on a construction site could result in:

- Environmental damage
- Pollution
- Fire
- Slip, trips and falls
- Collapse of stored materials
- Handling problems
- Health risks
- Financial costs

Therefore, it is Swiftline Policy that good levels of housekeeping will be adhered to at all times throughout the duration of a project.

All employees are made aware of the need to maintain the site in a tidy condition throughout the contract. The Site Manager is to inspect site tidiness during daily site inspections.

A site-specific emergency procedure should be in place at each site outlining procedures to be followed in the event of a spillage and contact details of the relevant authorities such as the Environmental Agency and Local Water Authority. Waste is to be disposed in accordance with the Waste Management Regulations.

## 7.0 Suppliers

Materials are derived from numerous sources and suppliers and choice is often restricted by the design specification. There can, however, be significant environmental benefits by maximising the use of sustainable suppliers and environmentally friendly, reused or recycled materials.

These procedures will apply to all project and maintenance work and it will be the responsibility of the project manager to ensure that the procedures are followed:

- The project manager shall review all purchasing policies, including the identified responsibilities for environmentally based buying decisions, the criteria for acceptability of materials and products, the agreed sources of information and the basis on which the company may exceed the environmental objectives of the purchasing policy.

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- Waste production is to be minimised by appropriate purchase orders. Orders will be monitored regularly to ensure excess waste is not being generated.
- That timber supplies should come from sustainable sources.
- Asbestos products should be avoided whenever possible but if there is no alternative a suitably licensed supplier must be used. Ensure that the information is passed on so that it can be added to the Health and Safety File.
- During product design or project planning all steps must be taken to avoid the use of environmentally hazardous substances, such as lead paints, rigid urethane foam, CFC containing materials, toxic preservatives, fungicides and pesticides. Suitable alternatives should be used whenever possible.

## 8.0 Emergency Response Procedures

The majority of industrial and commercial sites have the potential to cause significant environmental harm and to threaten water supplies and public health. In addition to the obvious threat posed by chemicals and oils, even materials which are non-hazardous to humans, such as foods and beverages, can cause serious environmental harm. The run-off generated in the event of a fire can also be very damaging.

The environmental impact of such an incident may be long term and, in the case of groundwater, may persist for decades or even longer. As a result, the legal consequences and clean-up operation can be costly. Rivers, sewers, culverts, drains, water distribution systems and service ducts all present routes for pollutants to travel off-site. As a result, the effects of a discharge may not be evident on site but may become apparent some distance away. In some cases, for example in the event of a fire, atmospheric deposition could also have a long-range impact.

During the project planning stage all environmental hazards and risks shall be identified, documented on a risk assessment and addressed. There are still, however, residual risks that cannot be entirely negated and details of these should be displayed on the emergency plan within the 'emergency plan and risk assessment', along with the location of the storm water (blue) and foul water (red) drainage systems.

### Environmental Emergency Procedure

#### Investigation

Carry out a detailed investigation identifying causes, remedial actions and recommendations to prevent recurrence. Complete form and return to:

Incidents with no environmental impact

'Near Miss'

#### Notification

- Contact the SH&E Department

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- For 'Near Miss' incidents complete the 'Report an Incident' Form, highlighting the Near Miss section and submit to the SH&E Department.
- Implement revised work procedures as necessary.
- Monitor & Review the situation to ensure revised work methods are appropriate and an improvement is made.

#### Notification

Immediate verbal notification to the SH&E Department required

- Report Incident – Site Manager responsibility
- to notify SH&E Department by quickest means.
- Complete Incident Report Form
- Submit Incident Report Form and Incident Investigation Form to the SH&E Department for recording onto the Company log.
- SH&E Department to notify Environmental Agency and the Director with SH&E responsibilities immediately.

It is vital that incidents of this nature are escalated ASAP. This will ensure that we are able to manage the information flow.

Prevent further contamination

Pollution incidents

- Spillages/leak (Oil/chemicals/fuel)
- Contaminated water entering a drain or watercourse
- Wind-blown dust and waste
- Fly tipping of waste

In the event of an environmental incident occurring, the relevant telephone numbers should be displayed on the site emergency contact list to be found on the Site Safety Notice Board.

### 9.0 Policy and Procedure Review

The Company is committed to minimising environmental impacts, complying with relevant legislation and to continuously improving its environmental performance.

This policy will be reviewed annually and will form part of the company's ISO 9001:2000 and ISO 14001 quality management system. This document will be reviewed and audited as being part of the quality management systems.

The Group Operations Director responsible for Safety, Health & Environment will annually review and report the environmental performance of the company against the following criteria:

- Report emergency and/or pollution incidents
- Public complaints

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- Prosecutions
- Resource usage, including waste production and recycling initiatives

The Company Directors will review the policy and procedures with regard to changes to legislation and environmental best practice. The policy will be amended accordingly and circulated as required.

Kevin McLoughlin

Director



Signed:

Date 6<sup>th</sup> January 2022

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