



A2 – ENVIRONMENTAL POLICY

1. ENVIRONMENTAL POLICY STATEMENT

2. ORGANISATION AND DUTIES

- 2.1 Managing Director / Directors
- 2.2 Health, Safety, Environment & Quality Manager
- 2.3 Maintenance
- 2.4 Managers/Supervisors
- 2.5 Company Employees

3. APPLICATION

- 3.1 Energy Conservation
- 3.2 Air Pollution
- 3.3 Noise Pollution
- 3.4 Water Management
- 3.5 Waste Minimisation
- 3.6 Re-cycling
- 3.7 Waste Management
- 3.8 Conservation/Heritage
- 3.9 Hazardous Chemicals
- 3.10 Purchasing
- 3.11 Upkeeping Appearance of Company Premises
- 3.12 New Projects and Refurbishments
- 3.13 Monitoring
- 3.14 Training
- 3.15 Resources



1. ENVIRONMENTAL POLICY STATEMENT

The policy of the Company is to encourage respect for the environment and the adoption of an environmentally responsible attitude in the fulfilment of business objectives.

The pursuit of this policy will require the Company to focus attention upon the following key principles: -

- full compliance with all relevant legislation, and whenever practical meet or exceed industry best practice on environmental issues;
- commitment to prevention of pollution and improvement in environmental performance.
- promote this policy and generate awareness through training of employees on the importance of environmental issues;
- environmentally responsible purchasing, where commercially justifiable to use alternative materials, products and services to reduce impact;
- waste minimisation and efficient use of energy and water on our sites and in our offices;
- segregation of waste for recycling or reuse where possible, encourage the use of re-cycled materials where appropriate, reduce the quantity of waste sent for landfill;
- provide the information necessary to enable the Company's products to be properly used, stored and disposed of so as to avoid unacceptable environmental effects;
- provide the necessary information to enable employees to operate the processes efficiently and in an appropriate environmental manner;
- assess the environmental impact of new projects as part of the tender process;
- maintain the appearance of the Company premises to high standards;
- maintain a well-serviced and efficient fleet of vehicles , promote good driving practice to minimise the use of fuel, and where possible to encourage the use of alternative forms of travel;
- set reasonable environmental targets and monitor performance; and
- report significant environmental performance changes and improvements to employees.

ENVIRONMENTAL POLICY APPROVED:

Graham Jackson

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Managing Director

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2. ORGANISATION AND DUTIES

The following section is intended to explain the major environmental responsibility of individuals within the Company structure.

The lists shown are not intended to be exhaustive.

2.1 MANAGING DIRECTOR / DIRECTORS

The provision of the appropriate management framework for the Company Environmental Policy and its regular monitoring, and the regular review with the management team of its effective implementation. See also the duties of Managers and Employees.

2.2 HEALTH, SAFETY, ENVIRONMENT & QUALITY MANAGER

The duty of the Health, Safety, Environment and Quality Manager is to advise, guide and assist management to achieve the aims and objectives set out in its Environmental Policy statement, and collect and report factual data to management. To this end, duties include:-

- Liaison with Safety Representatives, Employee Representatives and Management Representatives.
- Advising on environmental aspects in the design and use of plant and equipment, and assistance with approval of new equipment before commissioning.
- Advising on the environmental precautions necessary in the introduction of chemicals and processes, which may be hazardous.
- Keeping up to date with and advising on legal requirements in respect of environmental protection at work.
- Maintaining liaison with other departments or personnel for environmental matters, also such official bodies as the local Environmental Health Department and the Environment Agency.
- Keeping up to date so far as is necessary in relation to the workplace and the risk present in the area of the protection of the environment.
- Devising general Environmental Training and implementing both general and specific training in the Company. These courses are to be repeated at appropriate intervals. All new employees are to be instructed as soon as possible after commencement of employment.
- Arranging periodic internal/external environmental audits and inspections of both the Company premises and waste disposal contractors, to report upon the results of such inspections, to make recommendations for remedying any defects found, and to ensure correction.
- Providing for the investigation of causes of any environmental incidents and of the circumstances leading to the incident, the compilation of the necessary incident reports, and tendering advice to prevent recurrences.
- Advising on the disposal of general and hazardous waste.
- Advising on the re-cycling of suitable waste.
- Providing an Emergency Management service, in conjunction with the Managing Director.
- Advising on environmental monitoring in the areas of:-

Temperature/Humidity
Odours
Drainage Systems

Lighting
Air Quality
Energy

Noise
Water Quality
Waste

- Establish and maintain management system for ISO 14001 accreditation.

2.3 MAINTENANCE

The Maintenance Manager is in control of services on the site that have the potential to cause harm to the environment. The duty of the Maintenance Manager is to guide and assist management to achieve the aims and objectives set out in its Environmental Policy statement, and collect and report relevant factual data to management.

To this end, duties include:-

- To devise and manage an energy conservation programme, to keep records of such conservation and to report results to management on a regular basis.
- To devise and manage a water conservation programme, to keep records of such conservation and to report results to management on a regular basis.
- Arrangements for the disposal of general waste in conjunction with the Health, Safety, Environment and Quality Manager
- Arrangements for the upkeep of the appearance of Company premises including the grounds.
- Arrangements for the upkeep of collection and/or treatment plants in good working order to prevent, so far as is reasonably practicable, pollution of the surface drains and sewerage systems.
- To implement energy efficiency improvements wherever possible.

2.4 MANAGERS/SUPERVISORS

- Shall be responsible for the effective implementation of the Company Environmental Policy within his/her area of responsibility.
- Shall devise and implement all specific training needed to achieve environmental protection within his/her area of responsibility.
- Shall investigate any environmental incidents within his/her area of control, and ensure that corrective action is taken and documented to prevent a recurrence of the incident.
- Shall keep under review the necessity for, and act as necessary to ensure the introduction of, further measures, instruction and training to ensure the protection of the environment within his/her area of control.
- Shall ensure that the established environmental protection measures, systems of work, programmes of inspection, training and instruction are maintained in his/her area of responsibility.
- Shall arrange for any defects in environmental protection measures to be rectified.
- Shall instruct those under his/her control or within the department, precisely and clearly on their duties in respect to the protection of the environment within their work area.

- Shall make himself/herself reasonably available to receive and discuss environmental queries raised by employees under his/her control.
- Improvements to the above aspects of performance.

2.5 COMPANY EMPLOYEES

Each employee has a legal responsibility for the attainment of adequate environmental standards in the workplace. There is a statutory duty placed on every employee under the Environmental Protection Act 1990, to take reasonable care for the protection of the environment.

Company employees

- Shall participate in prescribed training programmes in order to familiarise themselves with the requirements of the Company Environment Policy.
- Shall observe the relevant environmental procedures and specifications at all times.
- Shall conform to all environmental instructions given by the appropriate manager or supervisor.
- Shall report all environmental incidents in the department to the supervisor.
- Shall co-operate with the Company's re-cycling programme.
- Shall co-operate with the Company's energy programme.
- Shall, where possible, reduce waste within their area of work.
- Should make suggestions to improve and protect the environment within the factory to the appropriate Manager or Supervisor concerned, or to the Health, Safety, Environment and Quality Manager.
- Must report all potential or actual hazards to the environment to the manager or supervisor concerned.

3. APPLICATION

3.1 Energy Conservation

Energy management makes good business sense as it saves money as well as affording a degree of protection to the environment by reducing carbon dioxide emissions. Significant energy savings can be made with relatively minimal effort.

Electricity

Employees shall ensure during working hours, that any lighting in any areas which are not in use are switched off and that at the end of working hours prior to leaving the site that, if no other employees are working in the area, they switch off all lights in that area.

Any electrical equipment, which is not in use or on a programme for use, must be unplugged and the socket switched off.

Gas

Employees shall ensure during working hours, that any gas appliances or equipment which are not in use are turned off, and at the end of working hours prior to leaving the site, that all gas appliance/equipment are turned off.

Heating

Heating will be switched on during the winter months (around October to April inclusive) and during any periods of extensive inclement weather. Portable heaters must not be used without permission.

The heating system is on the Company's scheduled maintenance programme and regularly serviced to keep it in efficient working order.

3.2 Air Pollution

In respect of Company vehicles, the Company will endeavour where possible to reduce fuel consumption and to select vehicles using unleaded petrol/diesel fuel. All Company vehicles are on a scheduled maintenance contract, which assists with efficient use of vehicle fuels.

All boilers on the Company premises are regularly serviced and maintained to ensure efficient working order to prevent air pollution from burning fuel.

The burning of rubbish of any type is strictly prohibited on Company premises including the grounds and construction sites. Confidential documents should be shredded on site or sent to confidential waste contractors for disposal.

3.3. Noise Pollution

The Company will carry out noise assessments within and outside the offices and where necessary on construction sites to monitor the effects of noise on neighbouring properties. Aspects of the Company's activities which are found to affect the local community will be controlled to the lowest practicable level.

3.4 Water Management

The Company will implement, wherever appropriate, methods of water conservation, re-cycling and reduction of trade effluent.

3.5 Waste Minimisation

Careful consideration will be given to the elimination or minimisation of waste at source and the re-cycling or re-use of materials will be implemented wherever it is felt that it is safe to do so, that the quality of the final product will not be affected, and that it is economical to do so.

3.6 Re-cycling

The Company will introduce re-cycling programmes wherever reasonably practicable.

3.7 Waste Management

Disposal and transport of wastes off site will be carried out in a responsible manner with due regard to all environmental considerations. Discharge of trade effluent to sewer will be controlled as required by legislation. The Company will endeavour to minimise spillages and maintain good housekeeping as part of its system of ensuring legal compliance with Environmental Legislation.

3.8 Conservation/Heritage

The Company grounds and construction sites are in some areas that have become home to various forms of natural wildlife. The Company will endeavour to conserve the grounds and sites so far as is reasonably practicable to protect such wildlife.

3.9 Hazardous Chemicals

Substances containing Chlorofluorocarbons (CFCs) and 111-Trichloroethane will not be permitted to be used for manufacture of, or incorporation in, any of the Company's products.

3.10 Purchasing

Consideration will be given to environmental issues when purchasing raw materials and products necessary for the business.

The Company will aim to improve its process efficiency and thereby reduce its raw materials usage. Where the Company considers it to be commercially and reasonably practicable, it will introduce alternative materials which will reduce the demand on natural resources (eg. re-cycled paper).

3.11 Upkeeping Appearance of Company Premises

Plans for new buildings, alterations and developments on the premises and construction sites will include an environmental assessment.

All buildings and grounds belonging to the Company will be kept in a good state of repair, in a tidy state and litter free so far as is reasonably practicable.

3.12 New Projects and Refurbishments

The Company will assess all new machinery, materials and new processes for environmental impact.

3.13 Monitoring

Regular environmental monitoring will be carried out by either the Health, Safety, Environment and Quality Manager, or Maintenance personnel and/or regulatory bodies in the following areas:-

Air monitoring, Lighting, Noise, Odours, Temperature/humidity, General waste disposal, Hazardous waste disposal, Trade effluent Drainage Systems

Records of all relevant monitoring will be kept for suitable or legally required periods depending on the type of monitoring.

3.14 Training

The Company will:-

Make all employees aware of the Environmental Policy and objectives and their responsibilities within the Policy.

Identify and implement suitable employee training for all employees including Management to cover the relevant environmental issues.

3.15 Resources

The Company has arranged for suitable and sufficient resources to be made available for environmental management including financial arrangements.