

ENVIRONMENTAL POLICY STATEMENT

The company is committed to protecting the environment by complying with all relevant UK legislation, meeting national standards relating to the environment and in accordance with the best working practices currently in use by the industry. This is an ongoing commitment which requires working procedures to be frequently reviewed and adapted to reflect the continual changes that are taking place in the industry to ensure the company is at the forefront of the changes with regards to the environmental protection.

The company uses the word environment to cover both the natural environment and ecosystems as well as the built environment and the effect the company's operations can have on people's lives and heritage. As a Company working on infra structure schemes, this pledge to environmental protection is further extended to protect the health & safety of employees and the public in general so that the company's impact on people's environment is beneficial and not harmful.

To achieve these objectives the company will:-

- Fully comply with current legislation, our own company operating procedures and/or clients operating procedures to ensure the highest standards are obtained. The company is not satisfied with merely satisfying minimum legal requirements but will be pro active with its clients in setting and achieving higher standards when practicable.
- Ensure any subcontractors working under the company's control also follow similar standards and attitudes.
- Ensure company staff are aware of environmental issues and the procedures they must follow. This awareness training will be encouraged at all levels and in subcontract companies as well as our own.
- Minimising the impact of the company's activities by adopting best practices that are available at that time. This maxim will be applied to all aspects of the company's activities including design, site operations, plant & transport selection and use, energy efficiency, re-use and recycling options, and waste minimisation.

With regards to the fixed location operations, the company will carry out an environmental impact assessment of the premises and activities and produce an action plan covering what changes can be made to reduce the effect.

With regards to site activities, environmental issues will be considered along with quality and health & safety issues at the planning stage and the environmental impact assessment will be incorporated into the project Health, Safety & Environmental plan and agreed with the client before work commences.

The environmental performance of the company is to be monitored by Mark Burton and will be reviewed annually by him. Objectives will be set and the monitoring and review is to ensure the company is achieving these objectives. This review will also take into account any changes in legislation, advances in technological knowledge and changes in industrial practice, and if required, the company's objectives will be re-set taking into account these changes.

The company is aware of ISO 9000 and ISO 14002 and will adopt the philosophy detailed in these standards in its operations.

1. DUTIES & RESPONSIBILITIES

1.1 Duties of the Director with Special Responsibilities for Health, Safety & Environment

In addition to his general director duties the HS&E director shall have additional responsibilities for:-

- a) Providing a company statement on any issue of health, safety or environment that requires a formal statement.
- b) Ensuring he is informed of and agrees with any correspondence to/from the Environment Agency.
- c) Having regular meetings with the Contracts Managers with a view to reviewing performance in the last period, setting objectives for the next period, and receiving feedback in general on environmental issues.
- d) Ensuring the Board are informed of any major environmental issues affecting or likely to effect the Company, and through the Board promote a pro-active approach on such issues.
- e) Ensuring that there is adequate environmental advice and awareness at all levels of the Company; ensuring all employees are made aware of the Company's Policy and that they receive adequate training and consultation to enable them to contribute to minimising the Company's impact on the environment.

1.2 Duties of Directors and Other Senior Managers

Directors and senior staff should implement the Policy by:-

- a) Ensuring environmental issues are given due regard at tender stage and that such issues are identified so that an effective control strategy can be developed.
- b) Ensuring that staff and contractors at all levels receive appropriate training to enable them to understand environmental issues and the important role they play in minimising environmental impact.
- c) Monitoring environmental performance through site meetings and responding to actual site conditions observed when on routine site inspections.

- d) When holding meetings with employees and other people, ensure environmental issues are discussed and receive comments and suggestions on ways in which the Company's performance can be improved.
- e) Setting a good personal example and having adequate knowledge of health, safety environmental legislation relating to your aspect of the Company's work.

1.3 Duties of Site Manager (and other persons in control of the site)

The duties are to:-

- a) Understand the Company Environmental Policy and ensure that it is brought to the attention of all employees, particularly new starters, through induction talks.
- b) Have adequate knowledge of legal requirements and good working practices.
- c) Ensuring that all necessary registers and records are maintained and that persons under your control are adequately trained to enable them to understand their role in environmental issues.
- d) Ensure that the necessary environmental risk assessments have been carried out and recorded. The main findings of these assessments should be brought to the attention of the site staff along with the health & safety risk assessments.
- e) Ensure that adequate arrangements are made with regards to waste procedures to both minimise waste and to ensure waste is correctly classified and handled.
- f) In planning the site layout and work give due regard to environmental issues as identified in the assessment.
- g) Ensure any environmental incident is reported in accordance with Company policy.
- h) Set a good personal example at all times.

1.4 Duties of Foreman, Engineers, Quantity Surveyors and Staff Visiting Site.

The duties are to:-

- a) Be familiar with the Company's environmental policy and the legislation as it relates to your work.
- b) Ensure that you give concise instructions to operatives working under your control, detailing what precautions/actions must be taken to minimise environmental impact.
- c) Ensure that new employees, apprentices, young persons or occasional site workers are aware of the issues and what actions they must take.
- d) Set a good personal example and ensure small plant, tools and equipment are being used correctly.

1.5 Duties of Plant Manager

These duties are as detailed in the Site Manager's duties, but in addition you should:-

- a) Ensure all plant sent to site is safe, is in accordance with the manufacturer's specifications, and when applicable has been tested and thoroughly examined in accordance with current EC & UK environmental regulations.
- b) When purchasing plant and equipment ensure the item meets UK and EC requirements, especially with regards to guarding, operator noise levels, environmental noise levels and emissions. Ensure that whenever possible "quiet plant" is purchased or hired.
- c) Arrange for regular servicing and maintenance of all plant and ensure that adequate records are maintained to corroborate this. Any item of plant reported as being defective should be taken out of serviced until repaired/checked.
- d) Ensure any waste from the plant and vehicle workshop is correctly handled and recycled where possible. If the waste has to be disposed, ensure that this is done in accordance with current requirements.

1.6 Duties of Office Managers and Office Supervisors

The duties are to:-

- a) Understand the Company's health, safety & environmental policy and ensure that it is brought to the attention of all employees, particularly new employees and temporary employees, through induction talks.
- b) Have adequate knowledge of environmental requirements and practices as they relate to your work and that of the office. Assist and encourage staff to be more environmentally aware in the every day workings of the office.
- c) Ensure any environmental incident is reported in accordance with Company policy.
- d) Set a good personal example at all times.

1.7 Duties of All Site Staff and Operatives

The Company has a strong commitment to health & safety and environmental issues. To be successful, the Company needs your assistance in following the Company's procedures and so minimising risk. In addition the Company needs employees to be pro-active in these areas in identifying areas in which improvements can be made.

TRAINING

The Company has a strong commitment to training and this commitment will be extended to environmental issues. If the Company is to progress and go forward on environmental issues its staff must understand the basic issues before they can contribute to changing procedures and improving performance.

Therefore environmental issues will start to be included with health & safety training on the Company training courses and refresher courses. New employees will receive induction training in environment as well as health and safety.

The Managing Director and Safety Director will review staff training needs on an annual basis and environmental issues will be a part of this review process.

NEW CONTRACTS PROCEDURES

Under the Construction (Design & Management) Regulations, when the Company is taking the role of Principal Contractor for a project (which is the case for most of the Company's work), a health & safety plan has to be produced identifying the significant hazards and detailing how the Company intends to manage that site so that the hazards are controlled.

This hazard identification will be extended to include environmental issues. The Contracts Manager and the Site Manager will review the potential environmental impact of the project on both the natural environment and the built environment. Works will be planned to minimise the impact on both sectors.

Similarly, on projects where the Company has a design role or input into the design and selection of materials, environmental concerns will be taken into consideration when selecting materials and articles. The Company already carries out value engineering studies to evaluate the best options over the full life of the project. Environmental considerations are being incorporated into this value engineering process.

ENVIRONMENTAL INCIDENT AND REPORT PROCEDURES

1.8 Definition of an Environmental Incident

There are no legal definitions of environmental incidents and so the Company has adopted the following definitions and categories:-

1.8.1 Emissions to the atmosphere

Methane leakage or loss	More than one tonne or where widespread complaints are received
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Ozone depleting substances	Greater than 100 kg.
Odours	Any complaints
Any toxic gas	Any unplanned release
Dust, smoke and aerosols	Any complaints
Breach of emission limits	All occurrences

1.8.2 Emissions to land

Spillages of hydrocarbons	50 litres or more
Pesticides and herbicides	Any uncontrolled or accidental spillage run Off or spray drift
Contaminated or polluted water	500 litres or more
Chemicals	Any uncontrolled or accidental spillage
Unauthorised deposit of waste	Any occurrence
Breach of Duty of Care	Any occurrence

1.8.3 Discharges to water

Breach of any consented discharge limit	Any occurrence
Unauthorised discharge or depositing of solids or liquids into water (i.e demolition waste falling into water, contaminated liquids or ground water being pumped to rivers or streams etc.)	Any occurrence
Any unauthorised or deliberate act of vandalism which resulted in substances used or stored on site causing damage to a watercourse.	Any occurrence
Breach of any EA pollution incident categories. See below for details.	Any occurrence

1.8.4 EA Defined Categories

The EA have three categories of pollution incidents to water. These are:-

Category 1

A 'major' incident involving one or more of the following:-

- Potential or actual persistent effect on water quality or aquatic life.
- Closure of potable water, industrial or agricultural abstraction necessary.
- Extensive fish kill.
- Excessive breaches of consent conditions.
- Extensive remedial measures necessary.
- Major effect upon amenity value.

Category 2

A 'significant' pollution incident which involves one or more of the following:

- Notification of abstractors necessary.
- A significant fish kill
- Measurable effect on invertebrate life.
- Water unfit for stock
- Bed of watercourse contaminated
- Amenity value to the public, owners or users reduced by odour or appearance.

Category 3

'Minor' suspected or probable pollution which, on investigation proves unlikely to be capable of substantiation or to have no notable effect.

1.8.5 Noise

Breach of any regulatory limit or limits set by planning consent	Any occurrence
Any complaints of noise due to our-of-hours activities	Any occurrence

1.8.6 Damage to amenity or cultural heritage.

Reports will be required on any complaints arising from a reduction in the aesthetic amenity or public enjoyment value of areas such as:-

- National parks or national trails.
- County parks and other forms of recreational areas.
- Local authority and private recreational areas.
- Damage of near miss situations involving a listed building, public monument, conservation area or other building of archaeological importance.

1.9 Reporting Procedure

The Site Manager or Contracts Manager should complete the environmental incident report form and submit it to the Safety Director as soon as possible and at least within 24 hours of the incident occurring. See appendices for environmental incident report form.

2. WORKING PROCEDURES

2.1 Dust

During dry conditions, dust can be both a nuisance problem as well as an environmental problem. Precautions such as enforcing strict speed limits for vehicles, and in extreme conditions, using water dousing will help to minimise the problem.

2.2 Fuels, Oils and Other Fluids Stored or Used on Site

The storage area should be chosen, having taken into consideration, the environmental factors surrounding the site. If there are watercourses or open drains, tanks should be positioned as far away as possible to minimise spillage to such areas.

Diesel and fuel tanks will be bunded and the bund capable of holding 110% of the largest tank capacity. The bund will be fitted with a drain valve to allow rainwater to be drained away. This drain valve will normally be locked shut.

As an alternative, a purpose designed double-skinned storage tank can be used.

The discharge hoses should be kept in good condition and inspected on a weekly basis. The discharge nozzle should have a holding bracket to eliminate repeated small discharges after plant and vehicles have been re-fuelled. The discharge line should have an isolating valve positioned as close as possible to the tank and this discharge valve should be locked closed whenever the tank is unattended.

If possible, a hard standing should be provided for the re-fuelling area. When re-fuelling static plant and equipment, absorbent mats or granules should be available to deal with any spillage and drip trays should be used under such plant. Fuel being transported or carried around the site should be in purpose designed bowsers or carrying containers.

With regards to oils and other fluids, consideration will have to be given to health & safety aspects of these substances as well as environmental aspects. If it is safe to do so, they should be stored in a secure container where they are protected from vandalism and any spillages are contained within the container. With some substances, it is essential that they are stored in open, well ventilated areas in which case bunding or other impermeable layer is placed under the storage area.

2.3 Fume Emissions

The Plant Manager will ensure that plant sent to site is in good condition and filled with the correct grade of fuel and lubricants. It is important that Site Managers ensure the daily checks are carried out and that the correct grade of fuel is used in the plant. The Plant Manager will arrange for the routine servicing to be carried out. If the plant's performance starts to deteriorate, and exhaust fumes and smoke are clearly visible, the Site Manager should stop the plant and arrange the corrective action to be taken.

2.4 Noise Emissions

Consideration must be given to the noise levels that will be produced from the plant and site activities. Plant should be selected with noise levels in mind. If the plant has to be left running overnight, it is important that *quiet plant or silence plant* is used.

The Company's Plant Manager takes into consideration the noise levels of plant and equipment when actually selecting and purchasing/hiring plant. It is important that any acoustic covers or panels are kept in position when the plant is being operated.

If operations involving high noise levels have to take place, consideration should be given to the people in the immediate vicinity and such works should be limited to the times which will have least impact on the neighbourhood. Noisy operations should be suspended at times such as morning breaks and lunch break periods.

2.5 Light Pollution

In some locations, light pollution from site lighting left on overnight can be a problem. Site Manager's should be aware of this potential nuisance factor when planning sites. Consideration should be given to neighbouring properties when positioning security and flood lights.

2.6 management of Top Soil and Sub-Soil

In planning the site, the Site Manager will take into considerations the need to segregate stripped top soil from sub-soil and from other material. If the top soil is to be stored for a considerable period of time, intermediate action may be need to keep the top soil in good condition.

2.7 Hedges and Trees

In general terms, all hedges and trees (and their roots) should be protected (if necessary, by fixed fencing) to ensure plant and site operations do not cause damage.

2.8 Wildlife Habitats

The contract documentation will generally identify any special wildlife habitats and the precautions that the Company has to take. If a previously unknown wildlife habitat is found, this should be identified to the client and a course of action agreed.

2.9 Waste Water and Ground Water

Waste waters from the canteen facilities must be discharged to a normal main sewer system or to a storage tank for remove by septic tank service.

Ground water that forms in excavations could be classed as contaminated. The contamination could be due to substances leaching out of the surrounding soils or it could merely be due to high suspended solids content of the water. If this type of water was to be discharged into an open water course, it could result in fish losses and damage to that water course ecology.

Site Manager's should take this into consideration when pumping out excavations and generally planning the site.

All discharges of water into water courses shall be subject to Environment Agency Local Drainage Boards or Local Authority Approvals. These approvals may have conditions relating to suspended solids and rate of discharge to avoid bank erosion and scouring.

2.10 Waste Management (Also See Section on duty of Care)

With regards to the office environment, it is the responsibility of the Office Manager to try and eliminate waste be better use of resources and by re-using items before resorting to disposal. Recycling of waste, such as waste paper, is preferable to simple disposal.

With regards to the plant yard, the Plant Manager is responsible for waste disposal and again, they should try to recycle or re-use substances as opposed to simple disposal.

With regards to site operations, it is the Site Manager's responsibility to develop a waste management plan for the project, taking into consideration the type and quantities of waste that are likely to be produced. If special waste will be produced, Waste Removal Contractors should be vetted to ensure that they have the necessary registration and approvals for handling such waste.

With regards to consignment notes, please see the section on Duty of Care for further details.

2.11 Work On or Near Water Courses

If work has to take place on or near to a water course, a method statement will be required detailing the scope of work and the precautions that have to be taken to minimise risk to health, safety and environmental damage.

The method statement should also give details of emergency or out-of-hours arrangements so that someone from the site can be contacted should an emergency situation develop. These people should have received specific instructions on the action to be taken to minimise environmental impact should an incident occur.

3. THE ENVIRONMENTAL PROTECTION (DUTY OF CARE) REGULATIONS

Anyone who "imports, produces, carries, keeps, treats or disposes of any controlled waste, or a broker who has control of such waste" is subject to the Duty of Care. Controlled waste is defined as any household, commercial or industrial waste, including building and demolition waste, therefore any waste that leaves site is defined as controlled waste and must only be moved after a transfer note has been issued.

3.1 The Duty of Care

The duty of care is described in Section 34 of the Environmental Protection Act 1990, which states that all those subject to the Duty of Care must:

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- a) Prevent others from depositing, storing, treating or otherwise disposing of waste without a valid licence or contravene the licence conditions; or act in a manner likely to cause environmental pollution or harm to human health. These are offences under Section 33 of the 1990 Act (Note: licensing is currently regulated by the Control of Pollution Act 1974)
 - b) Prevent the waste from escaping.
 - c) Ensure that waste is only transferred to an authorised person
 - d) Include with the waste transfer a written description sufficient to enable others to comply with the duty and avoid committing an offence under Section 33. A compulsory transfer note system was introduced by the Environmental Protection (Duty of Care) Regulations 1991.

This duty has been further extended by the Special Waste Regulation 1996.

3.2 Definitions

Waste Producer – The starting point for deciding who is the waste producer is to decide how the material became waste. A material may become waste by being changed in some way, for example demolition waste, in which case the waste producer is the person carrying out the change. Alternatively waste can be created by a decision of change of attitude, for example, the decision that material is surplus or unwanted, in which case the waste producer will be the person in possession of the object or substance who makes the decision that it is waste.

Waste Manager – A person who keeps, treats or disposes of controlled waste.

Waste Broker – A person who arranges the transfer of waste which he does not himself control what happens to it.

Waste Carrier – A person who transports waste. The company should be registered with a waste regulation authority and have a licence to confirm this registration.

To further clarify the responsibilities held in situations of contracting the following explanation is provided in the Code of Practice.

With regard to demolition or construction contracts the producer of construction or demolition waste may be regarded as the person undertaking the works which give rise to that waste, not the person who issues instructions or lets contract which give rise to waste. The client for works, although he may take decisions as a result of which waste is created, is not himself producing the waste created by the works. If there are several contractors and sub-contractors on site, the producer of a particular waste is the particular contractor or sub-contractor who (or whose employees) takes an action which creates waste, or, who begins to treat something as if it were waste (by discarding it). Where a client or contractor makes arrangements for the carriage of disposal waste, for example by letting a disposal sub-contract to a haulier for waste produced on site be a demolition sub-contractor, then that client or contractor will be acting as a broker in respect of the transfer between the two sub-contractors; in such a case all three parties will be under the duty. In practice it is likely that every contractor involved on a site will either be producing or carrying away some waste and will be subject to the duty as a

producer or carrier and therefor liable to account for the measures they have taken to comply with the duty in respect of that waste. It would also be prudent for the client to take reasonable steps to ensure that all the contractors he employs or supervises comply with the Duty of Care.

3.3 Duties of a Waste Producer

A waste producer is responsible for providing an accurate description of the waste. This should include:

- a) The type of premises or business from which the waste is generated
- b) The process that produces the waste and the quantity of waste.
- c) The name of substances which comprise the waste including a physical and chemical analysis, if applicable
- d) The care of the waste whilst they hold it.
- e) The packaging of the waste to prevent its escaping during transfer.
- f) Using a registered (or exempt) carrier to transport the waste.
- g) The final disposal of the waste depending on the degree of involvement in the selection of the waste carrier, manager or broker.

The waste manager should report suspicious circumstances which may indicate a breach of the duty in the disposal chain to the Waste Regulations Authority.

3.4 Duties of a Waste Carrier

The Waste Carrier is responsible for:-

- a) The adequacy of packaging and security of the waste whilst under his control
- b) Ensuring that a description accompanies the waste and that this description is accurate.
- c) Ensuring that any alteration to the waste is recorded in the description of the waste.

Any requests for contract vehicles to transport waste must be made to the sire of contracts manager who should ENSURE the contractor is registered for the transport of waste. Waste carriers are subject to the Controlled Waste (Registration of Carriers) and Seizure of Vehicles Regulations 1991.

3.5 Duties of the Waste Broker

The Waste Broker is responsible for ensuring that the waste is correctly and adequately described and is transferred by a registered (or exempt) carrier and that all documentation is properly completed.

3.6 Duties of the Waste Manager

The Waste Manager is responsible for:-

- a) Carrying out the disposal operation in accordance with the conditions of the Waste Regulation Authority Licence.
- b) Checking the description of the waste they receive. Sample checks on the composition are considered to be “good practice” and should be implemented.
- c) Ensuring that correctly completed documentation accompanies the waste.

3.7 Duty Holders

All duty holders should look out for breaches of the duty committed by others in the chain. Breaches of the duty should be reported to the Waste Regulation Authority and further dealings with the offenders should be considered.

Duty holders are only expected to do what is “reasonable in the circumstances”. The extent to which they should check up on others in the chain depends on the nature of the waste, how it is to be dealt with and what the holder might “reasonably be expected to know or foresee”. It is, for example, more important to check up on a consignment of toxic chemical waste than a load of waste paper.

3.8 Waste Transfer Notes & Consignment Notes

A waste transfer note or a special waste consignment note must be used before any waste is transported off site.

3.9 Completion of Site

On completion of the site, all **Waste Transfer Notes** and **Special Waste Consignment Notes** should be archived with the contract papers and retained:-

- For a period of 2 years in the case of transfer notes.
- For a period of 3 years in the case of special waste consignment notes.

Copies of the waste transfer notes should also be included in the health & safety file and handed to the client via the planning supervisor.