Environmental Management System

2022

Emery Brothers Ltd

Bathford Works

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DOCUMENT CONTROL

Document Issue and Change

This document is subject to formal change and control procedures amendments.

Amendment History

Revision	Nature of Change	Reviewed by	Review Date	Approved by	Approval Date
01					
02					
03					
04					
05					

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Section 1

ENVIRONMENTAL POLICY

ENVIRONMENTAL POLICY STATEMENT

The company recognises that its activities have an impact on the environment and is committed to improve its environmental performance and minimise the harmful effects through caring policies and effective management.

The company accepts and acknowledges its obligations and responsibilities under legislation and guidance dealing with environmental issues that affect or arise in consequence of its business.

The company will apply the methodology of its Environmental Management System (EMS) to identify and determine the environmental issues requiring attention and implementation of the measures to achieve continuous improvement. In particular attention will be given to:

- Environmental awareness and understanding of our business amongst those working for or on behalf of the company, providing training as necessary and encouraging contractors and suppliers to adopt sound environmental practices;
- The considerate use of land undergoing development having special regard to archaeology finds and the storage, treatment and disposal of any waste, hazardous or potentially toxic materials to avoid environmental harm;
- The use and re-use of materials to minimise and curtail creating waste and, whenever practicable, using materials and products from sustainable sources;
- Control the emission of pollutants, noise and dust, and the use of potentially harmful substances and treatments during construction activities;
- Conserve energy through sensible selection, use and management of resources, equipment, plant and transport;
- The continued development, monitoring and investigation of systems, practices and procedures at each stage of construction to ensure the environment remains a foremost consideration.

Signed  on behalf of Emery Brothers Limited

Richard Griffin

Contracts Director

Date: 7/01/2022

Section 2

PLANNING

2.1 INITIAL ENVIRONMENTAL REVIEW

Environmental Impacts and Aspects

Identification of environmental aspects and impacts

An organisation's policy, objectives and targets should be based on knowledge about the environmental aspects and significant environmental impacts associated with its activities, products or services. This can ensure that the significant environmental impacts associated with these aspects are taken into account in setting the environmental objectives. The relation between environmental aspects and impacts is one of cause and effect. An environmental aspect refers to an element of an organisation's activity, which can have a beneficial or adverse effect on the environment. For example, it could involve a discharge, an emission, consumption or reuse of a material, or noise. An impact refers to the change which takes place in the environment as a result of the aspect. Examples of impacts might include contamination of water or depletion of a natural resource.

The identification and assessment of all environmental aspects of a project must start from the initial design and continue through any subsequent review. It is a process that must be addressed and recorded. Refer to: ***(Appendix 2)***

This section is intended to provide a process for an organisation to identify significant environmental aspects that should be addressed as a priority by the organisation's environmental management system. This process should take into account the cost and time of undertaking the analysis and the availability of reliable data. Information already developed for regulatory or other purposes may be used in this process. Organisations may also take into account the degree of practical control they may have over the environmental aspects being considered.

Organisations determine what their environmental aspects are taking into account the inputs and outputs associated with their current and relevant past activities, products and services.

2.2 REGISTER OF ENVIRONMENTAL EFFECTS

Example of **Environmental Risk Assessment**
Core subjects and guidance

The site issues listed below are for consideration, this list is not exhaustive and some topics may overlap.

1. Site set-up
2. Site drainage
3. Treatment of site water
4. Water disposal
5. Material Storage
6. Silt
7. Fuel/oil storage and use
8. Concrete, cement and bentonite
9. Working near watercourse
10. Demolition
11. Emergency response
12. Ecology
13. Archaeology & heritage
14. Nuisance

A project environmental risk assessment and guidance on the topics above can be found in ***(Appendix 3)***. The assessment should be carried out in advance of the start of construction and the document reviewed if a significant change occurs. The key risks/impacts from the assessment should be extracted into the summary table and the overall risk rating determined from the scoring table.

The guidance given is intended to point out the best practice for managing environmental issues on site including site set-up, determining where and how to dispose of site water, and taking appropriate action in the event of a spillage. It is intended to support and not replace established contractual procedures or method statements.

Terms and Definitions
The term **environmental regulator** includes the Environment Agency, Natural Resources Wales, Scottish Environmental Protection Agency (SEPA), Northern Ireland Environment Agency (NIEA), The Department of Public Services in Guernsey and The Department of The Environment in Jersey.

Where Environment Agency Pollution Guidelines (**PPG**) are referred to, similar versions may be obtained from the Scottish Environment Protection Agency.

Where guidance refers to **asking permission** this includes obtaining permits to work, regulatory consents, approvals or verbal agreement as required, and should be sought from the person in control of the site e.g. main contractor, and/or the environmental regulator as required.

2.3 REGISTER OF LEGISLATION AND GUIDANCE

Environmental Law applicable in England, Scotland, Northern Ireland

Developing a register of legislation is the key to identifying where the company's activities are affected by the aspects and impacts already identified.

(Appendix 4) lists the relevant construction related environmental legislative requirements. Each company must understand how the legislation applies to its activities in addition to incorporating any local requirements.

NOTE – It is important that the register is kept current and up to date. The company will need to establish its own sources to meet their requirements

2.4 HAZARDOUS WASTE

Introduction

Under the Duty of Care, waste producers have a duty to classify and describe their waste correctly; this includes selecting the most appropriate six-digit code from the List of Waste (LoW).

The List of Waste (LoW) lists all wastes, grouped according to generic industry or process. Each waste has a six-digit code.

A waste is hazardous if it is classified as such in the LoW. Hazardous Wastes are identified in the LoW with an (*).

Some wastes are classed as hazardous outright. Other wastes require separate assessments to determine whether they are hazardous or not, depending on the amount of dangerous substances present above threshold concentrations.

Information contained on the SAFETY DATA SHEET that should accompany materials/chemicals received at site and should assist in determining if your waste is hazardous.

This section provides a practical approach to classifying hazardous waste by:

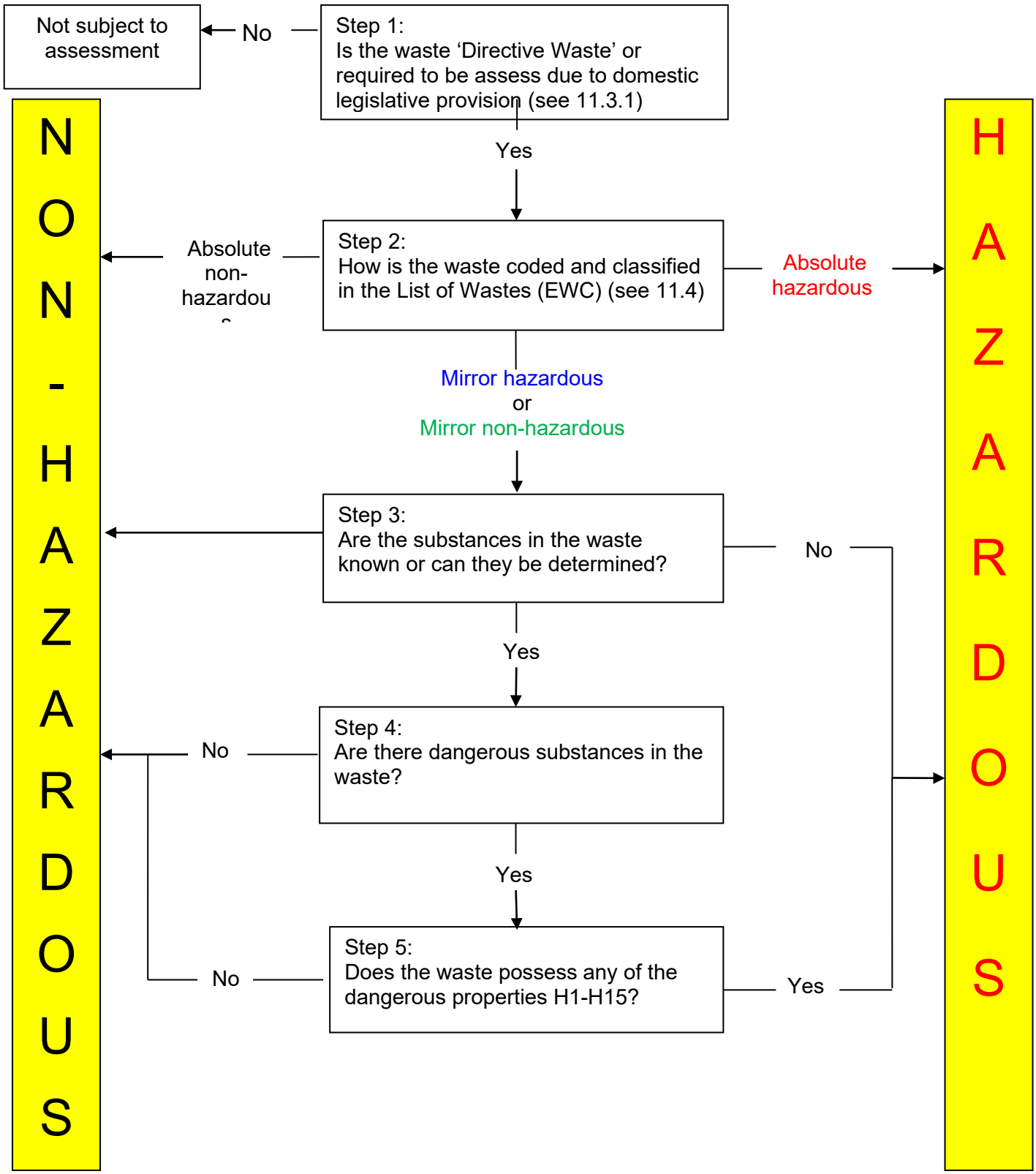
- outlining the methodology for assessing wastes based on the current LoW; and
- highlighting where to find more detailed advice in the Technical Guidance Note.

Hazardous Waste Assessment Methodology

There is a series of steps involved in determining if a waste is hazardous or non-hazardous.

Step 1: Is the Waste a Directive Waste?
Step 2: Does the domestic legislation contain specific provisions that relate to the waste in question? This should be determined prior to proceeding to step 3
Step 3: How is the waste coded and classified in the LoW?
Step 4: Is the composition of the waste known or can it be determined?
Step 5a: Does the waste contain dangerous substances?
Step 5b: Is there any reason to indicate the waste may be hazardous (e.g. test results)?
Step 6: Does the waste possess any of the hazardous properties H1 to H14? (Refer to data sheets).

THE DEFINITION AND CLASSIFICATION OF HAZARDOUS WASTE



Hazardous Waste
Interpretation of the definition of the classification of hazardous waste

The EWC refers to three types of entry:

"Absolute Entries" A number of wastes marked with an asterisk (*) are always deemed to be hazardous regardless of their composition or concentration of any "dangerous substance" within the waste. Such entries have been termed "absolute entries" and are coloured red in this document for clarity.

"Mirror Entries" Some wastes have the potential to be either hazardous or not, depending on whether they contain "dangerous substances" at or above certain thresholds. These wastes are covered by linked (usually paired) entries, collectively called "mirror entries" that comprise:

a hazardous waste entry marked with an asterisk (*), coloured blue in this document, and an alternative non-hazardous waste entry (or entries) not marked with an asterisk.

"Non-Hazardous Entries" Where a waste is not listed in the EWC 2002 with an asterisk, then it is not hazardous. However, where the non-hazardous entry forms part of a "mirror entry" assessment is required to determine whether the hazardous or non-hazardous waste entry is applicable.

An extract from the European Waste Catalogue is provided in *(Appendix 5)*
Hazardous Waste Regulations 2005

Advice on the Notification of premises
This section sets out some factors to be taken into account in determining what premises are and gives some examples. It particularly focuses on buildings / sites that have multiple occupiers.

- General requirement to notify
- What is a premises?
- Mobile Services
- Yards/Waste Transfer/Contaminated Land

Requirement to Notify
Producers of hazardous waste are required to notify premises at which they produce hazardous waste. Some premises are exempt from notification. Those are premises:

- listed in regulation 23(3) of the Hazardous Waste (England and Wales) Regulations 2005 (HWR); and
- at which less than 500kg (in total) of hazardous waste is produced in any twelve months period; and
- any hazardous waste produced there is removed by a registered carrier (under the Control of Pollution (Amendment) Act 1989) or a person exempt from registration.

It is an offence not to notify premises at which hazardous waste is produced (unless they are exempt premises) or to remove hazardous waste from premises, which are not notified (or exempt from notification).

Premises
Premises for the purposes of the HWR include any ship and any other means of transport from which a mobile service is operated.

Thus premises should be given its ordinary meaning but recognising that they can include ships and other vehicles such as road vehicles, trains, barges, aircraft etc. from which a mobile service is operated.

It will be a question of fact what premises are. All the circumstances need to be considered but the following factors are likely to be relevant (though this is not an exhaustive list – all the facts must be considered):

- is an area used exclusively by an operating unit;
- is there a specific area in which a particular activity is carried out separate from other activities occurring at the site;
- is there clear demarcation between areas – this could be physical separation such as walls or boundaries or if not physical a clear understanding that an area is for one operator's use;
- does an operator have the right to exclude others from their work area; and
- is there a legal interest in a particular space – a legal interest should be given a wide meaning and can include a license – we should not be asking to see those documents it is enough to know that use of a particular area is controlled by some form of legal agreement between parties.

Premises in England producing more than 500kg of hazardous waste within a 12 month period must register with the Environment Agency. Premises in Wales must register with Natural Resources Wales. Premises in Scotland and Northern Ireland do not need to register. More information may be found at https://www.gov.uk/hazardous-waste-producer-registration where you may also register online.

Mobile services and premises at which >500kg hazardous waste will be produced
Regulation 21 requires that a producer must notify relevant premises. Regulation 29 provides that where a producer operates a mobile service the relevant premises are the service premises. If a person operates a mobile service premises they must notify their service premises. They are not entitled to operate under any exemption applicable to site premises. Mobile service operators should notify the premises from which they operate their service (referred to in the HWR as service premises) where they produce hazardous waste at premises, which they do not own or occupy, (referred to in the HWR as the site premises or related premises) and the quantity of hazardous waste they produce is less than 500kg in any twelve-month period.

The less than 500kg limitation relates to each site at which the mobile service operator produces hazardous waste. Thus the notification for the mobile service operator can be used for any number of premises at which that operator produces less than 500kg of hazardous waste in any twelve-month period. If the mobile service provider visits the same premises several times during a twelve-month period, they must ensure that the less than 500kg qualifying limitation for those premises is not exceeded. Where the mobile service operator produces more than 500kg at a particular site during a twelve-month period, *that* site must be notified to the Environment Agency, but the mobile service operator can continue to use the notification for the mobile service at other premises visited where less than 500kg of hazardous waste is produced.

If more than one service provider produces hazardous waste at specific premises, each of them can rely upon the less than 500kg limit because the qualifying limit applies the "hazardous waste produced in the course of that service". For example, there could be five mobile service producers attending a set of premises.

Each of them could produce up to 500kg of hazardous waste in any twelve-month period and each of them could rely on their service premises notification.

If any mobile service provider produces 500kg or more of hazardous waste at any site premises they must notify the site premises (see regulation 24(1)(d)).

Business units producing their own hazardous waste (as opposed to any produced by a visiting mobile service) cannot rely on the mobile service notification for their own waste and would need to notify unless exempt.

Generally, a mobile service provider will have to comply with the consignment note requirements under the HWR when the waste is moved from the site premises their depot or another facility.

Where there is an **open yard and several operators** each have responsibility for and use of a clearly defined part of that yard each part should be notified. Where there is no clear distinction the entire premises should be notified.

The total amount of hazardous waste produced by all the producers at the site should be taken into account in deciding whether the premises are exempt or not. If there is any doubt whether the premises are exempt or not, it is open to any of the operators of the yard to notify the premises. If the premises are not notified and the exemption limit is exceeded, all the producers will be liable to prosecution.

Waste transfer stations or collection points will be required to notify because they will be premises from which hazardous waste will be removed as provided for by regulation 21 HWR.

Contaminated land site where more than one producer may be operating at any one time (unless there is a genuinely discrete area operated as separate premises from the contaminated land site) should be treated as single premises and notified once. The obligation for the notification should generally be arranged by the main contractor for the site. There is no requirement to expect each contractor to notify the premises separately.

2.5 SITE WASTE MANAGEMENT PLAN

Design Phase Requirements

Although no longer required by Law since December 2013 any efforts to improve resource efficiency and minimise waste during the design phase of a construction project can be described in a site waste management plan. This would allow the source of any cost-savings to be more easily traced as the plan would encompass the entire design-build process.

Pre-commencement

For all projects over £300,000 a SWMP may be prepared which may include the following information:

The identity of:

- the person who drafted the Plan;
- the person in charge of the project; and
- the contractor used (if there is more than one contractor, the principal contractor);

A description of the works proposed including the:

- location of the site; and
- the estimated value of the project;
- a description of the waste type that will be produced in the course of the project;
- an estimate of the volume of each different waste produced;
- the waste management action proposed for each waste type ie reuse, recycling, recovery or disposal; and
- a declaration that the person in charge of the project and the principal contractor will take all reasonable steps to ensure that waste management controls eg the duty of care, will be observed.

Commencement of Work

Projects that are over £300,000 and less than £500,000 in value

Once work begins, certain levels of monitoring and recording may be carried out.
The person in charge or the contractor would record:

- the identity of the waste management contractor removing the waste;
- the types of waste removed; and
- the site that the contractor is taking the waste to.

Projects over £500,000

More details of what actually happens are detailed and the Plan itself may be regularly reviewed.

The person in charge or the contractor would need to record:

When any waste is removed from the construction site:

- the identity of the waste management contractor removing the waste;
- a copy of, or reference to, the waste carrier registration of the carrier; and
- a copy of, or reference to, the waste transfer note.

As often as necessary to ensure that the plan accurately reflects the progress of the project, and in any event not less than every six months, may:

- assess the plan;
- record the types and quantities of waste produced;
- record the types and quantities of waste that have been:
  a. re-used on-site,
  b. re-used off-site;
  c. recycled for use on-site;

d. recycled for use off-site;
e. sent to recycling facility;
f. sent to waste management licence exempt site; or
g. sent to landfill site for disposal; and
h. produce a further plan, if it is necessary to do so, making changes necessary to reflect the progress of the project.

A Site Waste Management Plan pro-forma is provided in ***(Appendix 7)***

SECTION 3

IMPLEMENTATION AND OPERATION

3.1 DEFINE ORGANISATION AND PERSONNEL

Guidance

The successful implementation of an environmental management system calls for the commitment of all employees of the organisation. Environmental responsibilities therefore should not be seen as confined to the environmental function, but may also include other areas of an organisation, such as operational management or staff functions other than environmental.

Responsibilities and Accountabilities

The commitment of all employees to the successful implementation of an environmental management system should begin at the highest levels of management. Top management should establish the organisation's environmental policy and ensure that the environmental management system is implemented. As part of this commitment, top management should designate (a) specific management representative(s) with defined responsibility and authority for implementing the environmental management system. In large or complex organisations there may be more than one designated representative. In small or medium sized enterprises, these responsibilities may be undertaken by one individual.

It is also important that the key environmental management system responsibilities are well defined and communicated to personnel. People should know whose job it is to do what. The organisational structure usually consists of four main elements: the organisational chart, job descriptions, clear reporting lines and procedures, and performance targets. The organisational chart visualizes the organisational structure, main responsibilities and reporting lines. Issues that could be considered in developing the organisational structure are:

- provision of resources;
- action to prevent non-compliance;
- identifying potential problems;
- recommending solutions to problems and verifying their implementation; and
- acting in emergency situations.

It is often recommended that the environmental management responsibilities should follow the operational hierarchy, so that it becomes part of the everyday management of running the enterprise. The environmental manager should be responsible, either directly or by managing others, for ensuring that the environmental management system is established, implemented and effective. Top management should ensure that appropriate levels of resources are provided to ensure that the environmental management system is implemented and maintained.

For an organisation implementing an EMS simultaneously at head office and at site level defining responsibility is critical in often complicated situations. The following example shows clearly the structure and responsibilities.

Organisation and Personnel - Responsibility for Environmental Management

Company Director
The Director, who is responsible for implementing the requirements of the Environmental Policy Statement, the Director is also responsible for providing adequate resources for effective environmental management including specific environmental management within the company.

The EHS Director is responsible for the application, maintenance and improvement of the EMS in accordance with organisation, contractual and legislative requirements. He is responsible for reporting to senior management on the performance and effectiveness of the EMS via the Management Review.

Line Management
Line Managers are responsible for the implementation of the EMS through their actions and those of their staff under the guidance and assistance of the controlling Department. Line management is responsible for ensuring that all processes under their control which have an environmental impact are assessed and control measures put in place, managed and recorded.

Environmental Practitioners
Environmental practitioners are responsible for implementing and maintaining the EMS, assisting and advising Project staff on environmental documentation, planning, training and awareness and operational control. They are responsible for carrying out environmental inspections and audits and report performance of the EMS via the Management Review Procedure.

Site Staff
Site staff have day-to-day responsibility to ensure that site operations are carried out according to documented requirements of the EMS and the Client as directed by senior site staff.

Specialist Assistance
Where necessary, specialist environmental consultants are consulted where expertise is not available in-house to assist in planning and operational control of significant environmental impacts.

Contractors
Contractor's responsibilities for environmental management are defined in the site/project/contract Environmental Management Plans and are agreed under contract.

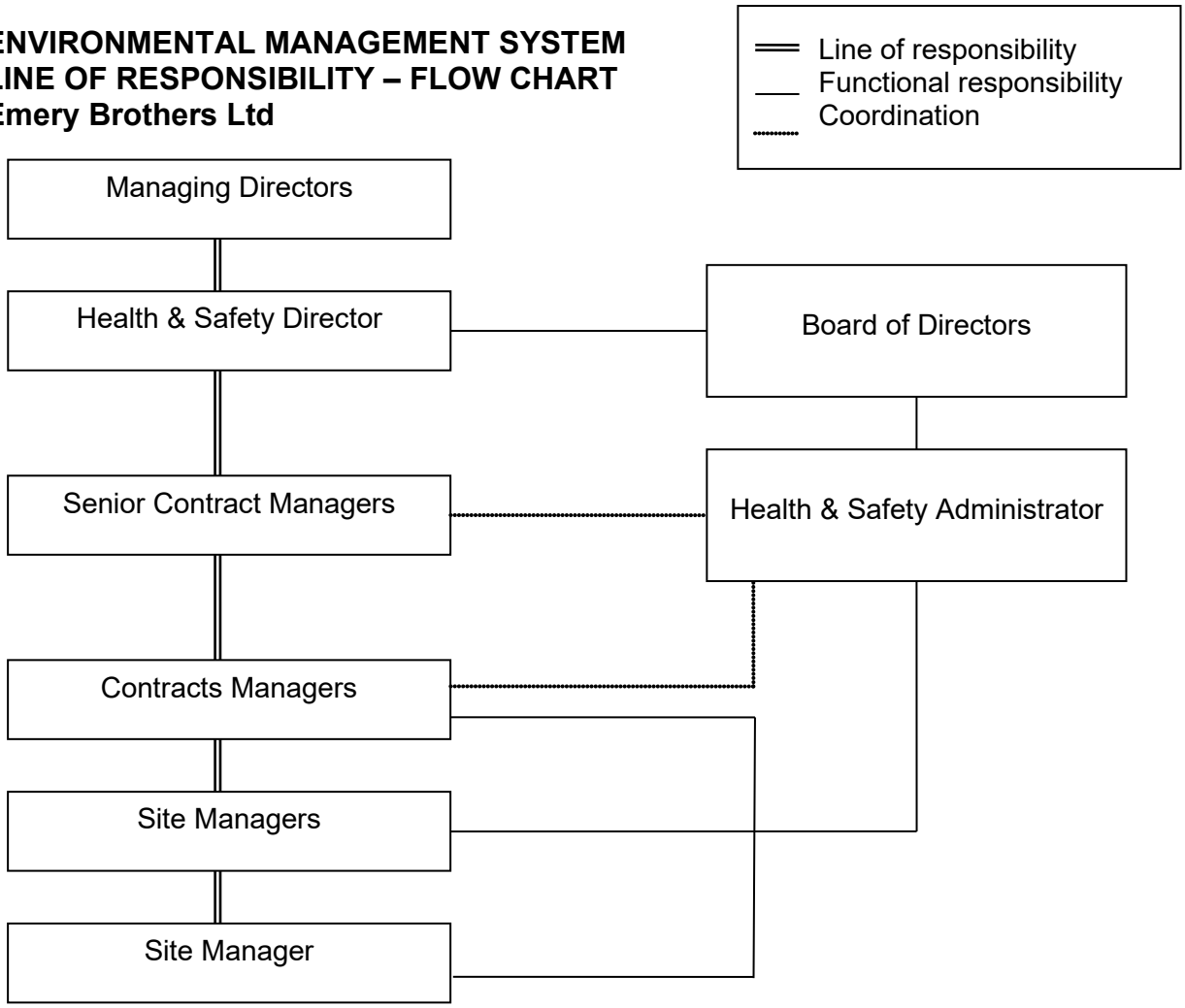
A Contractors Environmental Policy Declaration pro-forma is provided in **(Appendix 6)**

Documentation and Communication of Environmental Responsibility
Specific environmental practitioners' responsibility for environmental management is documented in individual job descriptions.

Site/project/contract environmental responsibility will be documented in site/project/contract environmental plans and are briefed out at project start-up and ongoing as required.

ORGANISATIONAL CHART

ENVIRONMENTAL MANAGEMENT SYSTEM
LINE OF RESPONSIBILITY – FLOW CHART
Emery Brothers Ltd



An example of an Environmental Management flowchart provides clear routes of responsibility and roles within the overall management system and demonstrates how the policy will be implemented.

(Any replication of this organisational chart must be adapted to reflect the environmental management structure of the company)

3.2 TRAINING AND COMMUNICATIONS

To be successful, responsibilities should be supported by the necessary authority and training to enable the individuals to carry out their tasks effectively. An effective and on-going training program is necessary for all levels of the organisation to ensure awareness of environmental issues. Training needs have to be assessed taking into account the job to be carried out, and the skills, education and experience of the individuals in charge.

Training should instruct on the organisation's environmental policy, objectives and action program. It should address the significant environmental impacts, actual or potential, and the environmental benefits of improved personal performance. Equally, it should highlight the potential consequences of departure from specified operating procedures. A successful training program is an interactive process that provides the participants with information, awareness, knowledge, understanding and motivation. This interactive process requires managers to respond to suggestions and initiatives raised pursuant to the training sessions. Even if the suggestions are not appropriate, they need to be treated seriously so that the initiative and impetus of the training is maintained. The benefits of training can be quickly lost if the employees feel that the training is carried out in a vacuum, and that other sections of the organisation are not fulfilling their roles.

Environmental Training
Environmental training needs are addressed at recruitment and appraisal, according to the company Performance Management Process. Selection and implementation of training material is managed by the company Training Manager.

Environmental Awareness
The Environmental Policy is briefed to operatives at induction.
Environmental awareness is provided by:

- Environmental Risk Assessments: and
- Toolbox Talks.

Further environmental briefings on topical issues are carried out as required.
Environmental Competence

Environmental competencies are stated in individuals' job descriptions and reflect the role and significance of specific tasks to impacts on the environment. Records of environmental competencies are retained with the company Training Manager.

Communication
Third Party Liaison and Complaints.
Other documentation *(e.g. environmental aspects, internal procedures, etc.)* shall not be made publicly available except by express permission of the *Senior Manager* on site.

Environmental Management System
BS8555: 2016 Environmental Management System has been introduced by the British Standards Institution. This enables smaller companies to develop an environmental management system in stages over a period of time. This route can lead to a full ISO 14001 accreditation.

All sites/projects/contracts must document their arrangements for environmental management by producing a Site Environmental Plan.

Local procedures are created for environmental aspects that require specific arrangements and instruction.

Document Control
Control of the EMS documentation will be managed by:

Hard copy files of EMS documents will be kept and archived. Electronic information will be stored on the company database for future retrieval.

Operational Control
Significant environmental impacts are identified using Risk Assessment and Control. Management of significant environmental impacts is documented according to the Site Environmental Plan, and site-specific risk assessments. These documents are briefed out at site level during site inductions.

Guidance on operational controls is provided in the following documentation:
- Register of Environmental Aspects and Impacts
- Environmental Risk Assessment: Pollution Prevention and Control Guidance
- Site Waste Management Plan

Contractors must produce risk assessments and method statements which include identification of environmental control requirements for review, they will be accepted once environmental controls are sufficiently in place.

Procedures relevant to suppliers and contractors are communicated via site/project/contract management or delegated representatives.

Emergency preparedness and response
Emergency response to environmental incidents is carried out in accordance with Procedures and includes a requirement to test the procedure.

SECTION 4

CHECKING AND CORRECTIVE ACTION

4.1 MONITORING

Measuring, monitoring and evaluating are key activities of an environmental management system, to ensure that the organisation is performing in accordance with the environmental policy, objectives and action program.

In establishing and maintaining procedures for investigating and correcting non-conformance, the organisation should include the following basic elements:

- identifying the cause of the non-conformance;
- identifying and implementing the necessary corrective action;
- implementing or modifying controls necessary to avoid repetition of the non-conformance;
- recording any changes in written procedures resulting from corrective action.

Audits may be performed by personnel from within the organisation or by external persons selected by the organisation. In either case the persons conducting the audit should be in a position to do so impartially and objectively. A timetable for planning audits is shown in ***(Appendix 8)***

Regular inspections should be carried out to see the correct management procedures are adopted and implemented at all levels throughout the organisation.

4.2 RECORDS

Records will be filed and archived as part of the system and in compliance with the General Data Protection Regulation 2018. It is important that records are retained to validate. Consideration will be given to the following:

- Reported incidents
- Incidents
- Insurance Claims
- Audit Reports
- Minutes
- Inspections
- Non-Compliances
- Contractor Incidents
- Contractor Info
- Publication of results

4.3 MANAGEMENT REVIEW

The organisation will review and continually improve its environment management system, to achieve overall improvement in environmental performance. At regular intervals management will carry out a review of the environmental management system to ensure its continuing suitability and effectiveness.

The scope of the review will be comprehensive, though not all elements of the environmental management system will be reviewed at once and the review process may well take place over a period of time.

Some issues to be considered in the review are:

- review of the environmental objectives and targets;
- audit findings;
- concerns amongst relevant interested parties; and
- evaluation of the effectiveness of the environmental management system;
- evaluation of the suitability of the environmental policy and the need for changes in the light of changing legislation, changing expectations and requirements of interested parties, changes in the products or activities of the organisation, developments in technology, lessons learned from environmental incidents, market preferences, reporting and communication.

Any audits planned and regular inspections will be recorded on ***(Appendix 8 and 9)***

APPENDICES

Appendix 1 Glossary
Appendix 2 Environmental Aspect & Impacts Register
Appendix 3 Environmental Risk Assessment
Appendix 3B Guidance Notes for Environmental Risk Assessment
Appendix 4 Register of Legislation
Appendix 5 Extracts from the List of Wastes (EWC)
Appendix 6 Contractors Environmental Policy Declaration
Appendix 7 Site Waste Management Plan
Appendix 8 Planned Audit Schedule of EMS
Appendix 9 Audit Report Form
Appendix 10 Emergency Response Plan
Appendix 11 Emergency Procedure poster: Spill

INFORMATION SHEETS

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