



**ENVIRONMENTAL POLICY**

**AND**

**ORGANISATIONAL  
ADMINISTRATIVE ARRANGEMENTS**

# **PROSOL (U.K.) LIMITED**

## **ENVIRONMENTAL POLICY**

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# PROSOL (U.K.) LIMITED

## ENVIRONMENTAL POLICY STATEMENT

Prosol UK Limited recognize that day-to-day operations can impact both directly and indirectly on the environment.

We aim to protect and improve the environment through good management and by adopting best practice wherever possible. Prosol UK will work to integrate environmental considerations into our business decisions and adopt greener alternatives wherever possible, throughout our operations.

In all our activities we aspire to:

Comply fully with all relevant legal requirements, codes of practice and regulations.

Prevent pollution to land, air and water.

Reduce water and energy use.

Minimize waste and increase recycling within the framework of our waste management procedures.

Identify and manage environmental risks and hazards, involve customers, partners, clients, suppliers and subcontractors in the implementation of our objectives.

Promote environmentally responsible purchasing.

Provide suitable training to enable employees to deal with their specific areas of environmental control.

Improve the environmental efficiency of our transport and travel.

Establish targets to measure the continuous improvement in our environmental performance.

All employees are responsible for working towards the objectives contained within this policy.

Committed to the continual improvement of the environmental performance of the organisation and will strive to maintain the continual improvement through the regular review of the management system.

Signed:..... Date: .....

David Hickson

The Director responsible for Environmental Policy

# **ORGANISATIONAL AND ADMINISTRATIVE ARRANGEMENTS**

## **1 Duties of the Company**

### **1.1 Executive Responsibility**

The Board of Directors will ensure that the policy is applied throughout the company and are ultimately responsible for meeting the obligations of present and future environmental legislation.

### **1.2 Managerial Responsibility**

The Site Managers will be responsible for ensuring compliance with the policy on the various construction sites. They should appoint a Representative or Co-ordinator to act as adviser and as a focal point for the dissemination of information and the promotion of local initiatives on improving the immediate environment, reducing wastage and achieving policy objectives.

### **1.3 Environmental Management: Responsibilities for Co-ordination**

An appointed Health, Safety and Environmental Committee will provide a regular forum for discussion of environmental policy issues, to enable policy development. It will monitor and review policy objectives and environmental initiatives. The Committee will report to the Directors on all matters of its activities and present recommendations for approval.

The Health Safety and Environment Advisor will facilitate the formulation, promotion and application of the policy by communication, persuasion and education.

The Health, Safety and Environmental Advisor will not be the sole source of expertise but will endeavour to provide guidance on policy issues and provide information on the legal obligations outlined in the Environmental Protection Act (EPA).

## **1.4 Staff Involvement**

Environmental protection involves contributions from everyone and it is the Company's intention to integrate environmental factors into the responsibilities of all its personnel.

The responsibilities which all employees have for the environment and compliance with policy guidelines will be emphasised in induction and training programmes.

Employees will be encouraged to present practical suggestions and ideas for waste reduction, energy conservation, minimisation of pollution etc. to their departments or sections for consideration.

## 2. WASTE REDUCTION AND RECYCLING

### 2.1 Recycling of general Company generated Wastes

The Environmental Protection Act 1990 has introduced measures to ensure that recycling is given priority.

Wherever possible our waste is segregated and where possible, recycled.

The Company shall comply, whether in the role of principal contractor or as a contractor, with the requirements of the Site Waste Management Plan Regulations 2008 which came into force on 6<sup>th</sup> April 2008.

These regulations shall apply to all projects with a value of £300,000 or more, with additional updating requirements for projects with a value of £500,000 or more.

The site waste management plan will have been produced and agreed with the Client / CDM Coordinator before the construction work commences

The plan will identify:

- The client
- The Principal Contractor
- The person who drafted it
- The location of the site
- The estimated cost of the project.

It shall record any decision made in order to minimise the quantity of waste produced on site:

- Describe the waste expected to be produced
- Estimate the quantity of each type of waste
- Identify the waste management action for each type of waste including reusing, recycling, recovery or disposal.

The plan shall contain a declaration that the client and the principal contractor shall take all reasonable steps to ensure that: -

- All waste from site shall be dealt with in accordance with the waste duty of care in section 34 of the Environmental Protection Act 1990 and the Environmental (Duty of Care) Regulations 1991; and
- Materials shall be handled efficiently and waste managed appropriately.

If the project has a value of less than £500,000, the principal contractor shall identify:

- the person removing the waste;
- the types of waste removed; and
- the site the waste is being taken to.

Within 3 months of the work being completed, the principal contractor shall add to the plan: -

- Confirmation that the plan has been monitored on a regular basis to ensure that the plan has been monitored on a regular basis to ensure that work has progressed according to plan and that the plan was up dated in accordance with the Regulation.
- An explanation of any deviation from the plan.

If the project is worth more than £500,000, the Principal Contractor shall additionally record when any waste is removed:

- The identity of the person removing the waste.
- The waste carrier registration number of the carrier.
- A copy of, or reference to, the written description of waste as required by section 34 of the Environmental Protection Act 1990.
- The site that the waste is being taken to and whether the operator of that site holds a permit under the Environmental Permitting (England and Wales) Regulations 2007 or is registered under those regulations as a waste operator exempt from the need for such a permit.

The plan shall be reviewed by the principal contractor at intervals not exceeding 6 months and shall: -

- Record the quantities and type of waste produced.
- Record the quantity and types of waste that have been,
  - reused (on or off site)
  - recycled (on or off site)
  - sent to other forms of recovery (on or off site)
  - sent to landfill
  - otherwise disposed of.
- Update the plan to reflect the progress of the contract.

Within 3 months of the work being completed the Principal Contractor shall add to the plan:

- Confirmation that the plan has been monitored and updated in accordance with the regulation.
- The comparison of estimated quantities of each type of waste generated against the actual quantities of each waste type.
- An explanation of any deviation from the plan.
- An estimate of the cost savings that have been achieved by completing and implementing the plan.

The plan shall be kept on site and available to all sub-contractors

Additional requirements include:

- Ensuring cooperation between sub-contractors during the construction phase.
- Induction, information and training for every worker, with respect to the site waste management plan.
- Ensuring the waste produced is reused, recycled or recovered.

## **2.2 Waste minimisation**

Waste reduction, as well as benefiting the environment may reduce raw material costs as well as costs for waste disposal. Sites should aim to develop waste reduction awareness in all employees. Re-use and re-cycling of materials should be investigated for all processes using raw materials and 'codes of practice' developed where necessary. All Sites should at the outset carry out a waste audit identifying all sources of waste, including water and energy consumption. Opportunities for the reduction of waste should be investigated (including a review of the company's purchasing systems). The efficiency of processes should be regularly assessed to ensure optimum use of raw materials.

Ideas concerning waste reduction or recovery emanating from employees should be carefully analysed by Supervisors and Managers.

Economic costs and benefits for each proposal should be carefully assessed.

## **2.3 Information and guidance**

Practical information on the detail of current systems and procedures will be available from the Health, Safety and Environment Advisor.



## **2.4 Future and proposed initiatives**

Recycling possibilities will be continuously reviewed.

### 3. PURCHASING POLICY

The Company will consider the implications for the environment and impact upon it when making purchase decisions regarding substances, materials, equipment and maintenance and building contracts. Considerations should be made consistent with all aspects of the Company's Environmental Policy and objectives.

In particular purchasers should consider: -

- Energy usage - including mains water and drainage water
- Waste minimisation and process efficiencies
- Re-use and recycling opportunities
- Waste disposal implications
- Avoidance of ozone depleting substances
- Reduction of volatile organic compounds
- Reduction of materials containing heavy metals
- Control of discharges to air, land and water
- Noise levels generated from plant and machinery
- 'Eco-Toxicity' of materials released to land, air and water
- Transportation choice and pollution.

Detailed advice and guidance can be obtained from the Health, Safety and Environment Advisor based on information held concerning present and future legislative requirements, currently accepted practices and Best Practicable Environmental Option.

## **4. WASTE DISPOSAL**

### **4.1 Household, Commercial and non-Hazardous Industrial Company generated Wastes.**

The collection, storage and removal of wastes from the Company offices and Company construction sites will, as far as is reasonably practicable, be undertaken in accordance with the code of practice for 'Duty of Care in Waste Management' outlined in the Controlled Waste Regulations 1992.

The company shall ensure that all waste transfer notes shall have a 6-digit identification code, in accordance with the European Waste Catalogue, entered on them

Overall responsibility for waste collection and management rests with the Office and Site Managers and any controlled waste arising from Company activities will be dealt with in accordance

Advice on the definition, classification or description of waste can be obtained from the Company's Head Office.

### **4.2 Hazardous (Special) Waste**

The Company acknowledges its responsibility as a waste producer, in particular with regard to the 'Duty of Care' outlined in the Environmental Protection Act.

Special waste is generally defined as having a 6-digit code and having one of the following hazardous properties: - explosive, flammable, toxic, infectious, ecotoxic, oxidising, irritant, carcinogenic, teratogenic, mutagenic, highly flammable, harmful, corrosive.

Paints, varnishes and adhesives that have a COSHH sign on the container and are not empty, should be classified as special waste as a precautionary task.

Special waste types being removed, must be accompanied by a waste consignment note

Waste disposal, waste management and the protection of the environment will be regularly scrutinised by the Health, Safety and Environment Advisor and the Health, Safety and Environmental Committee to ensure that all controlled wastes are handled in a careful and environmentally appropriate manner.

## **5. CONSERVATION OF RESOURCES**

### **5.1 Energy Policy**

The cost of electricity and other utilities is ever increasing and presents a significant portion of the overall cost of running the Companies offices.

The Company is committed to minimising its effect upon the environment without compromising the high standards of workplace facilities.

The Company will endeavour to specify and incorporate energy efficient facilities in new buildings, new developments and major refurbishment's.

The Company will promote energy conservation among its workforce by communication information and training.

A code of practice for energy and water conservation has been adopted by the Company and is a working document for office and on site staff.

### **5.2 Energy Audit**

Energy reviews should be undertaken for office buildings or areas as appropriate to identify where energy savings could be made e.g. heating/cooling, lighting, and operational equipment.

The assessment of current energy use within the Company will be made when practicable and objectives and targets for energy reduction should be set outlining the detail and time periods when these could be achieved.

### **5.3 Transport Policy**

Office staff and employees should use public transport whenever possible when travelling to and from work.

Company vehicles will be maintained to the highest standard and be tuned for optimum fuel consumption.

### **5.4 Recycling**

Recycling schemes should be reviewed in the light of the initial objectives on a regular basis and any recycling initiatives should be planned with a view to being able to quantify the achievements of such schemes.

### **5.5 Water Conservation**

Water use and water emissions to drain will form part of an energy audit and review conducted for Office buildings or areas. Objectives and target dates will be set for practical conservation measures to be achieved in these areas.

## **6. IMPACT UPON THE LOCAL COMMUNITY**

### **6.1 Noise pollution**

Events or developments or during site surveys, installation of plant or equipment suspected to have significant noise production will be assessed before being introduced or undertaken to evaluate the possible noise levels and the potential to cause a nuisance to neighbours or others.

Initial assessments will be made in consultation with the Health Safety and Environment Advisor who will undertake noise surveys or inform if further specialist advice is necessary.

### **6.2 Other assessments**

Similar assessments will be made where it is thought there is potential to cause any nuisance to neighbours or to others with regard to items such as: -

- Traffic
- Litter
- Floodlights, or other new practices, changes or developments likely to affect the local community

## **7. ASSESSMENT OF NEW DEVELOPMENTS**

### **7.1 Environmental impact assessment**

The Company recognises that certain wildlife (e.g. bats) are protected by law, and will safeguard such species when likely to be affected by any development or during any survey activities.

### **7.2 Ecology and landscaping**

Existing features of wildlife value will normally be retained in any development where practically possible. Where development is permitted, the impact on features of wildlife value shall be assessed and minimised.

### **7.3 Traffic**

The implications for traffic access and parking shall be considered for all new building and road developments.

### **7.4 Checklist audits - environmental auditing**

All proposed developments shall be subject to an 'environmental impact' assessment and an environmental audit or review based on current standards.

## **8. COMMUNICATION, INFORMATION AND TRAINING**

### **8.1 Legislation**

Relevant information on current and future legislation, statutory duties and implications for the Company will emanate from head office and from the Health, Safety and Environment Advisor.

### **8.2 Policy**

The Company will endeavour to promote its environmental policy so that it is understood by all members of its staff and on site employees. General communications will be made through internal 'safety / environmental notices'.

### **8.3 Policy Issues**

Communications on environmental policy issues will be made to the Site Managers and will normally emanate from head office or the Health, Safety and Environment Advisor.

### **8.4 Training**

Specific training issues will be arranged by head office in co-ordination with the Health, Safety and Environment Advisor.

The overall aim of training will be to develop an understanding of the Company Environmental Policy, e.g:

- Waste reduction and recycling principles
- Waste disposal systems
- Energy reduction and waste minimisation, and to promote awareness of the implications for the environment concerning all aspects of the Company's activities.

## **9. COMPLIANCE WITH STATUTORY REGULATIONS AND ADMINISTRATION OF POLLUTION**

### **9.1 Transport**

All Company transport will meet the current standard for exhaust emissions and will use lead-free fuels wherever reasonably practicable.

The policy will encourage the purchase of diesel and battery powered vehicles.

### **9.2 Emissions to atmosphere**

Whether or not processes attract any statutory requirement for control of emissions to atmosphere all efforts will be made to reduce such emissions to as low a level as is reasonably practicable by the application of techniques to eliminate or by engineering control at source.

### **9.3 Emissions to drain**

Any work task requiring pollutants to be discarded into the sewer system will be evaluated to determine the type and quantity of materials and frequency of such disposal.

Methods to eliminate, control or change the nature of such pollutants will be investigated but any such emissions necessary will be well within concentration standards specified by the Water Authority for the pollutant in question for disposal to sewer drain.

No disposal to surface water drains (i.e. those external to buildings) will be permitted and every effort will be made to prevent any accidental release, which could contaminate surface water.

### **9.4 CFC's and chlorinated hydrocarbons**

The Company will endeavour to eliminate the use of CFC's and chlorinated hydrocarbons where suitable substitutes are available. This elimination and substitution will be considered as an integral part of COSHH Assessments.

### **9.5 Refrigeration Equipment containing CFC's**

The Company plans to phase out all refrigerant liquids in common use that are ozone depleting substances and replacement by more acceptable substitutes.

#### Present Policy and Actions



- Audit all refrigeration equipment establishing type and approximate purchase date.
- Establish the refrigerant with which refrigerator equipment for proposed purchase is charged - ensure that it will not be phased out during a period acceptable to the user.
- For small self contained units incorporating hermetically sealed compressors i.e. domestic fridges and freezers: - if plant is healthy run until end of useful life, but make a contingency plan in case of failure if equipment is required for essential duties. This may mean purchase of new equipment instead of repair as the refrigeration system may not be able to run on new refrigerant liquids without costly conversions - check with your supplier.
- Plan how to dispose of unwanted plant - the deliberate discharging of CFC's to atmosphere is illegal.

## **9.6 Pesticides/Herbicides**

Pesticides are used only in situations when other methods of weed or pest control are impractical. The selection of the pesticide for regulation will be made for each individual operation on: -

- the basis of its suitability to achieve the necessary result.
- on its potential for harm to personnel.
- on its ecotoxicity.

The methods of use storage and disposal of pesticides will be in accordance with the HSC approved code of practice 'The Safe Use of Pesticides for Non-agricultural Purposes'.

Notification of each application of pesticides is made to the head office and is undertaken in accordance with any local code of practice. Types of pesticides used are reviewed by the Health, Safety and Environment Advisor when COSHH assessments are undertaken and new substitute materials are then considered.

## **10. MAINTENANCE OF BUILDINGS AND LAND**

### **10.1 Nature Conservation**

Nature conservation issues will be addressed by the Health, Safety and Environmental Committee. This seeks to: -

- Identify and protect sites of wildlife interest.
- Promote nature conservation among the staff and employees.

### **10.2 Aesthetic issues**

Aesthetic appearance of buildings site and premises will be a major consideration for new developments or alterations made by the Company.

### **10.3 Landscaping**

The Company will endeavour to ensure landscaping is planned and executed to provide an amenity, which can be maintained by environmentally acceptable methods.

## **11. ENVIRONMENTAL ASPECTS OF ENGINEERING**

### **11.1 Maintenance**

Maintenance of plant and equipment, planned preventative maintenance programs, have been established for site vehicles, Company owned plant, generators lifting equipment and the like.

Records of maintenance activities are held at head office

## **12. INCIDENTS AND EMERGENCY**

### **12.1 Procedures**

Specific procedures have been adopted in certain high-risk areas for actions in an emergency. The emergency actions outlined in the Company's Health and Safety Policy should be followed and all incidents must be reported to head office so that they can be investigated as soon as possible.

## **13. TRANSPORT**

### **13.1 Use of Public Transport**

Employees shall be encouraged to use public transport when travelling to and from work.

### **13.2 Maintenance**

Company vehicles will be maintained to the highest standards to limit emissions to the atmosphere and optimise fuel consumption.

### **13.3 Shared Transport**

Company staff will be encouraged to give lifts to their fellow employees and share the driving when using their own transport to and from work.

### **13.4 Route planning**

Route planning will be undertaken for all deliveries to site to ensure the most economical routes are used.

### **13.5 Site Vehicles**

Vehicles will be optimised to ensure their economical use, with journeys planned before work starts.

## **14. MONITORING THE POLICY**

### **14.1 Health, Safety and Environmental Committee**

It is the intention of the Company to continue to monitor the success of the Environmental Policy and to continue to develop via a health, safety and environmental committee, guidelines and procedures to enable staff and its employees to achieve the policy objectives.

## **15. ENVIRONMENTAL ASSESSMENTS**

### **15.1 Reviews**

The Company's Health, Safety & Environmental Committee or Health and safety Advisor will at appropriate intervals review the environmental management systems adopted to ensure their suitability and effectiveness. The Board of Directors as appropriate will consider the report on such reviews.

### **15.2 Audits / Inspections**

Audits and inspections of sites or of the Company's offices shall quantify environmental performance and define what needs to be done to sustain or improve it. Items to be considered should include: -

- The Company's Policy, organisational structure, responsibilities of personnel.
- Administrative and operational procedures i.e. protocol, communications, information and training.
- The tidiness of sites and buildings.
- Purchase of raw materials including waste minimisation.
- Energy efficiency/conservation of resources.
- Process efficiencies (to optimise production and minimise waste.
- Recycling systems
- Wastes and discharges (including noise and odour).
- Transport and distribution systems.
- Systems for dealing with accidents and emergencies.

Audits / Inspections may be most conveniently carried out on sites in parallel with, or as part of a site health and safety audit / inspection. Audits/inspections should be undertaken initially by Site Managers on an internal basis with support co-ordinated by the head office and the Health and Safety Advisor.

Site surveys and audit of central systems and procedures will be co-ordinated by the Health and Safety Advisor.

### **15.3 Progress**

Progress with policy development and implementation will be reviewed by the Health, Safety and Environmental Committee on a continuing basis but will be the subject of major review every 2 years.