



(CENTRAL) LTD

1-3 The Apple Store | Far Peak | Northleach | Cheltenham | Glos | GL54 3JL
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ENVIRONMENTAL POLICY IMPLEMENTATION PLAN

1. Environmental management plan
 - 1.1 Emergency planning
 - 1.2 Pollution prevention and control
 - 1.3 Waste and Energy Management
 - 1.4 Environmental Purchasing
 - 1.5 Communication and training
 - 1.6 Compliance monitoring and records



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1. ENVIRONMENTAL MANAGEMENT PLAN

Scope

This Environmental Management Plan has been adopted to continue NKS Contracts (Central) Ltd's commitment to the environment and at the same time provide the necessary controls to ensure compliance with environmental legislation.

The Environmental Procedures encompassed by this Management Plan will pro-actively cover all aspects and environmental impact of NKS Contracts (Central) Ltd's activities, and will deliver a comprehensive, workable and auditable Management System for environmental protection throughout.

This plan relates to employed members of staff and appointed sub-contractors.

Responsibilities

Eddie Stokes is the person having particular accountability for this policy, and, through his line management, is responsible for its implementation.

Nick Lacey, in conjunction with Management and Supervision, will monitor and audit compliance with the Environmental Procedures set out within this plan.

Procedures

1. Emergency Planning
Ensuring a comprehensive, workable and up to date emergency action plan is in place.
2. Pollution Prevention and control
Ensuring the active and effective control of all sources of pollution.
3. Waste & Energy Management
Ensuring the segregation of waste materials and duty of care compliance, recycling and minimising waste energy
4. Environmental Purchasing
Ensuring that the purchasing of materials is sustainable
5. Environmental Communication and Training
Ensuring requirements are communicated to all and active support is encouraged.
6. Compliance Monitoring and Records
Ensures all records are kept in compliance with this system and statutory requirements.



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The above procedures will be working documents and reviewed formally at annual intervals.

Signed: Eddie Stokes

Position: Director

Date: May 2021

Date of Next Review: May 2022

A handwritten signature in black ink, appearing to be 'E. Stokes', written over the signature line.



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1.1 EMERGENCY PLANNING

Purpose

The purpose of this procedure is to detail the actions to be taken in emergency situations. This procedure also details the responsibilities and actions to be taken in controlling spillage.

Scope

The scope of this procedure includes:

- Actions to be taken in the event of fire
- Actions to be taken in the event of spillage or leakage of materials
- Actions to be taken in emergency situations
- Emergency drill practices
- Emergency equipment and data required in the event of emergency
- Reporting of incidents, emergencies and complaints

Responsibility

The Site Manager in control of the site has the overall responsibility for ensuring emergency procedures are practised and adhered to and that adequate information is available.

Fire procedure

On discovering a fire:

- a) Ensure all personnel in the local vicinity are aware of the situation.
- b) Raise the alarm in accordance with local procedure, provide as much information as possible with regard to substances, which are or could become involved.
- c) Only attempt to fight the fire if you are trained, competent and it is safe to do so.
- d) DO NOT TAKE PERSONAL RISKS.
- e) Should the evacuation alarm be sounded report to the designated muster point for a roll call.

Spillage control

On discovering a spillage or leakage:

- a) Identify if possible the nature of the substance.
- b) If spillage material is hazardous ensure other parties are aware and removed to a safe distance. If in doubt treat the substance as hazardous.
- c) If necessary, raise the alarm in accordance with local procedure.
- d) Attempt to contain the spillage/ leakage if safe to do so.
- e) Make every attempt to prevent the spillage/ leakage entering watercourses.



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- f) Clear up spillage/ leakage with suitable materials and dispose of in accordance with COSHH data / local site procedures in order to prevent environmental contamination.
- g) Should the evacuation alarm be sounded report to the designated point for roll call.

Action to be taken in emergency situations

- a) In the event of an emergency situation a designated person must take control to ensure the safety of all personnel, and the following actions take place.
- b) If safe to do so attempt to minimise the hazard and control the situation.
- c) Ensure site emergency alarms are activated and relevant authorities have been informed (if required).
- d) If local or site evacuation is required all personnel to attend prearranged muster points for a roll call to take place.

Emergency drill practices

In order that any major practice drill can be carried out:

- a) Attendance records of all personnel on site must be available.
- b) All personnel on site must be made aware of emergency procedures, the location of muster points, the alarm system and actions to be taken in the event of an emergency.
- c) A suitable means of raising the alarm must be in place.
- d) A competent person appointed to take control in the event of an emergency situation. Emergency drill practices should take place periodically and be assessed by competent observers who will record the outcomes of such drills and implement any necessary improvements required to ensure that emergency procedures can be safely and effectively carried out.

Emergency equipment and data

a) The data which could be required in an emergency would include:

- A comprehensive, up to date attendance record.
- COSHH records for substances that have or may become involved in the incident.
- Detailed site plans of how and where, and in what quantity substances are stored.
- Emergency telephone contact numbers.
- Drainage plans.

b) Equipment could include:

- Firefighting equipment, spillage control media, emergency bunding material, specialised PPE, emergency deluge showers, breathing apparatus.
- This will be site or area specific and be appropriate to the hazard.



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Reporting of incidents, emergencies and complaints

- a) All issues to be reported immediately to the Site Manager and Health & Safety Director for logging
- b) Incident form to be filled out with:
 - date and time of incident
 - location
 - names of those involved
 - overview of incident
 - overview of actions
 - outcomes/further works
 - sign-off by Site Manager



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1.2 POLLUTION PREVENTION AND CONTROL

Purpose

The purpose of this procedure is to pro-actively and effectively prevent and control all potential sources of pollution or nuisance created by work activities in accordance with our Duty of Care responsibilities.

Scope

The scope of this procedure covers the prevention and control of:

- Discharges to water
- Ground contamination
- Releases to atmosphere
- Noise

In order to minimise environmental impact, from work activities, pro-active, detailed planning of scope of work, substances and procedures will be carried out, and effective controls implemented.

Discharges to water

- a) Identify substances and possible environmental impact that may ensue any unplanned release. Where possible substitute substance and ensure correct handling, storage, use and disposal, in accordance with Manufacturers Safety Data Sheet. (MSDS).
- b) No substances shall be directly discharged into watercourses, including drains.

Ground contamination

- a) Ground contamination by substances must be prevented by using bunded storage, drip trays under static plant and ensuring all mobile plant is regularly inspected for leaks. Contaminated land may need to be excavated in order to prevent washing of substances into ground water system. Contaminated spoil must be disposed of in accordance with local waste regulations.
- b) Drip trays need to be emptied regularly into a suitable receptacle so that correct disposal of contents can be controlled. c) Suitable materials for spillage control must be utilised. Such materials must then be disposed of in accordance with local waste regulations.

Releases to atmosphere

- a) There will be no incineration of any waste material.
- b) Minimising the frequency and duration of vehicle movements will reduce vehicle emissions. All vehicles and plant will be well maintained and turned off when not in use.
- c) Where welding operations produce significant emissions, Local Exhaust Ventilation will be used to filter out noxious substances, in line with COSHH regulations.



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- d) Work activities where dust could be produced need to be eliminated or controlled. Methods include vacuuming instead of sweeping, placing waste dust in sealed containers, dust suppression ie. damping down and filters on extractors.
- e) The release of chemical vapours must be minimised. Container lids should be fitted at all times when not in use, if the vapour is present when using the substance ensure sufficient local exhaust ventilation is provided.

Noise

Noise is not created by usual processes undertaken by our organisation, however this must be controlled and reduced to the lowest practicable level. To ascertain this, causes, and levels of the noise have to be identified, usually by noise and risk assessment. Once determined alternative processes and or control measures need to be implemented. If substitution of a process not possible, use:

- a) Plant fitted with silencers and vibration dampers.
- b) Sound proof screens/ barriers around noisy work.
- c) Control working hours.
- d) Monitor, re-assess and improve where possible.



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1.3 WASTE & ENERGY MANAGEMENT

Purpose

The purpose of this procedure is to detail the responsibilities for, and methods by which the disposal of waste produced is accomplished.

Scope

The scope of this procedure extends to all known and identified waste products produced and covers:

- Reduction of waste
- Energy conservation
- The segregation of re-usable and recyclable materials
- Compliance with duty of care, including the maintenance of the necessary records

Responsibility

It will be the Site Manager's responsibility to ensure that the following controls are implemented.

Reduction of waste

All waste will be kept to a minimum by pre-planning and recycling.

Energy conservation

All electrical equipment will be switched off when not in use. All plant and equipment will be turned off when not in use. Heat conservation within buildings will be monitored and optimum savings achieved.

Segregation of waste

An assessment of waste materials will be carried out in order to identify all re-usable or recyclable waste. This will then be segregated accordingly. Separate storage for paper, cardboard, wood, metal and waste oils for recycling should be utilised. All such waste will be re-used on site where possible or sent for recycling via a licensed waste contractor.

Licensed waste contractor will transfer only materials that are suitable for landfill to a licensed landfill site.

All contaminated waste, chemical waste and sewage will be disposed of as special waste via a licensed waste contractor.



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Duty of care & records

Only selected licensed waste contractors will be appointed to remove any waste products from site to licensed tips. All such contractors will be audited to ensure compliance with duty of care requirements. All such transfers shall be fully documented with waste transfer slips. These slips shall be kept on file for inspection, and record of transfer of duty of care to the license holder



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1.4 ENVIRONMENTAL PURCHASING

Purpose

The purpose of this procedure is to ensure thorough evaluations of materials and suppliers are undertaken to enable the organisation makes the right choice in procurement.

Scope

Evaluations will be made based on the following criteria:

- Geographic proximity
- Origin of materials & Supplier ethos
- Lifecycle costs
- Production processes

Geographic proximity

Suppliers who are geographically closer to sites will be used preferentially to help reduce transportation costs and emissions.

Origin of materials

Consideration will be given to materials and suppliers who promote sustainability and ecological conservation in their sourcing of materials

Lifecycle costs

Whole life costs of materials will be considered and discussed with the client.

Production processes

Manufacturing processes will be environmentally sound.



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1.5 COMMUNICATION AND TRAINING

Purpose

The purpose of this procedure is to ensure active support for the Environmental Management System throughout the workforce, to be administered by effective communication and training.

Scope

Communication and training will be delivered through:

- Induction training
- Toolbox talks
- Notice boards
- Environmental news flashes

Induction training

General and site specific environmental training will be given to all employees and contractors. This information is contained within induction, which is tailored to meet the requirements of each individual location.

Toolbox talks

Our continuous programme of toolbox talks will address and provide information and training on current environmental issues.

Notice boards

Environmental policy, procedures and information will be prominently displayed to ensure that all employees are up to date with site rules and instructions.

Environmental news flashes

Environmental news flashes are circulated to all sites, in order to highlight a particular aspect of environmental concern, which may stem from lessons learnt on other sites. This then allows for contingency plans to be drawn up pro-actively and implemented throughout the company.



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1.6 COMPLIANCE MONITORING AND RECORDS

Purpose

The purpose of this procedure is to ensure comprehensive, up to date and readily retrievable records are available. This will give auditable proof of monitoring activities and compliance with statutory requirements and with the Environmental Management Plan.

Scope

The scope of this procedure is to ensure adequate site documentation is:

- Available
- Retrievable
- Credible
- Recordable
- Able to be monitored

Availability on site

Access to all documentation relating to the Environmental Management Plan and associated procedures including records contained therein, must be available on site.

Retrievability

The storage of all environmental documentation must be systematic and be within the scope of the Quality Management System.

Credibility

All registers, records and documentation must be accurate, legible, comprehensive and up to date.

Recordability

All incidents, complaints and emergencies are to be recorded by the Site Manager

Monitoring

The Health & Safety Director will log and monitor incident reports from site to analyse trends. This will inform policy and procedural changes.