

Title: ENVIRONMENTAL MANAGEMENT			Degould Innovative engineering
Ref:	PR06	Effective Date:	02.06.2017
Version:	1	SI (if applicable):	NEW ISSUE


Document type: COMPANY PROCEDURE

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Document no: PR06


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Approvals

Issued by Wynn Stait	Date 02.06.17	Signature 
Procedure Owned By Dan Gould		

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1.0 OBJECTIVE

To ensure that the company conducts its activities in an environmentally responsible manner continues to improve its operations where practical to do so, in order to reduce the effects on the environment.

2.0 SCOPE

This procedure applies to all employees or sub-contractors who perform construction, installation, maintenance, repair, major renovation, or specialty work on a Degould site.

3.0 DEFINITIONS

KPI	Key Performance indicator
SHE Team	Safety, Health and Environmental Assessors Team
HFC	Head of Finance and Compliance

4.0 RESPONSIBILITIES

Directors and Managers

The Directors are responsible for ensuring that the company operates within the parameters defined by policies and the relevant legislation.

Head of Finance and Compliance

The HFC is to ensure appropriate controls are in place to ensure legal compliance in all activities and is also responsible for ensuring appropriate mechanisms are in place to identify the company's Environmental Impacts and resulting controls are maintained. The HFC is responsible for ensuring that the licensing, registration and operations of any waste disposal contractors are checked periodically.

SHE Team


The SHE (Safety Health and Environmental Team) in collaboration with any other members of staff or external advisers they involve, is responsible for performing analysis of the company's Aspects and Impacts and for their periodic review.

All Staff

All staff have the responsibility for following the controls stipulated by this procedure and advising the HFC of any Environmental considerations that should be included on the Impacts register.

5.0 ASSOCIATED DOCUMENTS

- 5.1. PR04 Quality Management
- 5.2. Q02 Corrective and Preventative Actions
- 5.3. H01 Accident Reporting
- 5.4. H05 Method Statements
- 5.5. H10 Risk Assessments
- 5.6. Environmental Aspects and Impacts

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5.7. Legal Compliance Matrix

6.0 PROCESS

6.1. Legal and Legislative and Other Requirements

The HFC maintains and communicates the register of applicable legislation. He will update the register when necessary via:

- Relevant publications
- Professional bodies, Institutions, Associations, etc.
- Liaison with regulators (Environment Agency, etc)
- Other networking (e.g. seminars, conferences, workshops, etc)

Requests for the purchase of Standards or Specifications shall be made through the HFC.

6.2. Environmental Aspects and Impact

Degould identifies its Environmental Impacts through the production and maintenance of an annual register which includes those impacts and risks which the company has either control or reasonable influence over; it covers normal, abnormal and emergency conditions for present and planned activities.

Score = IMPACT x LIKELIHOOD X PREPAREDNESS


Value	Impact	Likelihood	Value	Preparedness
1	No known effect	Unlikely (>5 years)	1	No plans to manage the impact should it occur
2	Contained /Minor	Likely-Long Term (1-5 years)	0.7	Some provisions made for managing impacts
3	Moderate	Likely-Short Term (6 months- 1 year)	0.5	Full contingency plans to tackle impacts
4	Substantial	Very Likely - near future (0-6 months)		
5	Major	Continuous/Imminent		

6.3. Communication

The company's Environmental Policy is available to ALL interested parties upon request. However it is not policy for the company to volunteer information relating to its performance or significant risks to external parties, unless a specific request is made or there is a specific requirement to do so. Where necessary, a response will be made within 28 days, or within the specified time scale, by initial addressee if possible and under the guidance of a company Director.

All correspondence from regulatory authorities relating to suspected offences will be treated as a complaint and prioritised for urgent action. In all cases, the CEO, will be informed immediately and action will be taken within 24 hours, or as soon as is reasonably practical.

Degould shall maintain an External Communications log for all communications from interested parties, a record of all relevant communication will be maintained by the HFC and will be retained for a period of five years.

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The HFC will ensure adequate communication with the Emergency Services so they may update any site plans, and be aware of any changes to any hazardous materials stored on site.

6.4. Environmental Objectives and Targets

Environmental Objectives are identified through the grading of each Impact for its significance using the formulae stated above, a threshold score is set and any impact exceeding that score actioned; the threshold score is reduced each year to demonstrate continual improvement.

6.5. Competency and Training

Education is performed for Tasks and Areas with associated Environmental Risk before work is undertaken. If any person is unsure or requires any further information they should ask their immediate supervisor or manager.

6.6. Monitoring Compliance

Once controls have been determined adherence to stated controls are monitored through Internal audits and constant supervision through the Degould management team. All staff are encouraged to identify areas of Environmental concern through the company's suggestion scheme called the System Improvement Log.

6.7. Waste Management

All wastes are disposed of in compliance with relevant legislation and current best practice, where practicable efforts are made to recycle to minimise the risk of pollution. This shall include the monitoring of waste management activities, meeting training needs and periodically reviewing options for the reduction of waste and recycling.

Site based personnel are responsible for complying with any identified waste streams at their point of work; in situations where policies are not in existence then best practice will be adopted.

Contractors have a responsibility to ensure that all waste they produce during their activities on Degould Limited site is managed safely and in accordance with legislative requirements. Contractors may only use Degould waste containers with prior agreement.

It is the responsibility of all employees to segregate and store waste in the appropriate containers and designated areas.

Activities likely to produce additional or non-routine waste will be pre-notified to the HFC so that provisions can be made.

Controlled waste


Waste from any premises used for or in connection with the provision of public transport, the public supply of gas, water, sewerage or electricity services, the provision to the public of postal or telecommunications services.

Hazardous waste

(Set out in EC Directive 91/689/EEC which classifies industrial waste according to hazard as opposed to risk). Includes oils, paints, contaminated wipes, waste chemicals, aerosols etc.

Hazardous waste must not be mixed or combined with general waste. Each person, involved in a process where hazardous waste is generated, shall be responsible for its secure storage and disposal. This process shall involve:

- Place items in Chemical Disposal Waste containers/bags.
- Notify HFC of the chemical and quantity that requires disposal.

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- Disposal arranged by HFC.

The following are considered hazardous wastes:

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| <ul style="list-style-type: none"> ○ Contaminated waste water from bunds ○ Waste from drip trays (disposal) ○ Empty containers and tins from solvents and cleaning fluids ○ Used clothes and gloves contaminated with solvents |
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Hazardous liquid wastes shall be stored in containers appropriate for the properties of the waste. Such containers will be stored in a suitably bunded area.

Waste that is not described below will be stored until special arrangements for collection are made by the Head of Finance and Compliance.

- General plastic (recycle)
- Electronic equipment (reuse / WEEE)
- Cardboard boxes/trays (reuse)
- Damaged and not suitable for use cardboard boxes (recycle)
- Paper (recycle)
- Cans (recycle)
- Used cartridges, toners (disposal / WEEE)
- Canteen food waste (disposal)
- General Non-hazardous waste (disposal)
- Empty containers from chemicals in high use (recycle via supplier)

Containers will be inspected for extraneous articles before collection, where possible and practical. Extraneous articles will only be removed where it has been identified that it is safe to do so.

Recycling:

As far as is reasonably practicable, waste management and waste minimisation will be practiced through a three tier approach:

- reduce
- reuse
- recycle


7.0 RETENTION PERIOD

- 7.1. Refer to WI01. Project Filing and Archiving Work Instruction
- 7.2. The HFC shall maintain a record of the following documents for a period of five years :
 - all waste carriers used for specific wastes.
 - the method of disposal and final destination of waste.
 - waste disposal contractors' registration details
 - waste disposal transfer notes
 - the waste management licensing conditions for relevant disposal

8.0 CHANGE HISTORY

VERSION	SI	SUMMARY OF CHANGE	DATE
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