



Sustainability Approach

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ENVIRONMENTAL PROCEDURES

This section details the arrangements and procedures that we will use to help implement our Environmental Management Policy and ensure compliance with current Environmental Legislation.

Within the procedures, reference is made to the 'Project Environmental Management Plan'. This is a project specific document which should be prepared for all new projects and it should detail the project specific arrangements and constraints for the management of all environmental issues on the site.

AIR POLLUTION

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to air pollution for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for air pollution control on site
- Develop section of the Project Environmental Management Plan to include air pollution control
- Ensure all sub-contractors and suppliers abide by air pollution control guidelines
- Liaise with the Environmental Manager for all air pollution control issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan regarding the control of air pollution
- Ensure all staff comply with the air pollution control procedures

PROCEDURES

Operational Control Guidelines

1. Any requirements for air quality monitoring throughout the project must be identified prior to the commencement of any works.
2. All activities which may cause air pollution should be highlighted and specific risk assessments and safe systems of works should be prepared.
3. All operations are to be carefully planned and managed to ensure that impacts are kept to a minimum.

4. All plant and equipment will be chosen and serviced regularly to minimise emissions.
5. Where air monitoring is carried out, all records will be retained for a minimum period of 12 years.
6. All permanent and temporary employees, including sub-contractors and suppliers, will be made aware of their responsibilities to ensure that no air pollution incidents occur.
7. In the event of an air pollution incident, the Emergency Control Procedures outlined below will be followed.

Emergency Control Procedures

1. In the event that excessive dust is arising from operations on site due to plant or traffic movements, then damping down of the roads and surrounding area shall be used to control the dust. Road sweepers shall also be used to keep roads clean and tidy where appropriate.
2. If the problem persists it may be necessary to install wheel-washing systems.
3. Where dust is arising from excavations, water shall be applied across the working area.
4. Where dust is arising from stockpiles of materials, water shall be applied to the stockpile, or the stockpiles should be sheeted.
5. Care shall be taken in both instances where water is being applied to the soil to prevent excessive run-off causing a further pollution incident, or a safety hazard due to the weakening of the ground.
6. If any item of plant is releasing excessive emissions through its exhaust, it should be turned off, returned to the hire firm and replaced with better quality plant.
7. Where emissions are becoming a problem during cutting the method of working will be changed to use damping or extractive techniques.
8. Should any excessive odours arise from storage areas including fuel, chemicals and waste the cause should be investigated and changes made to storage arrangements.
9. Waste must be regularly collected and removed from site to prevent odour emissions.
10. In the event that a serious environmental incident occurs, contact the company's Environmental Manager and advise the Environment Agency using the 24 hour Emergency line - **0800 80 70 60**

CONTAMINATED LAND

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to contaminated ground for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for prevention and control of known contaminated land issues on site
- Develop section of the Project Environmental Management Plan to include prevention and control of known land contamination
- Ensure all sub-contractors abide by contaminated land guidelines
- Liaise with the Environmental Manager for all contaminated land issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan regarding the prevention and control of land contamination issues
- Ensure all staff comply with the contaminated land guidelines

PROCEDURES

Operational Control Guidelines

1. Any areas of contaminated land must be identified from the site investigation data and contract documents so that its treatment and/or disposal can be managed.
2. If additional sampling or testing is required, this must be identified prior to the commencement of any works.
3. All operations involving contaminated land must be clearly identified and project specific risk assessments and method statements must be prepared.
4. If contaminated materials are stored on site, the method of containment must prevent any escape of dust, leachate or other substances.
5. Disposal of contaminated materials off site must be to licensed sites and in accordance with the Duty of Care.
6. All permanent and non-permanent employees, including sub-contractors, must be made aware of their responsibilities to ensure that contaminated land is unable to cause further pollution.

7. In the event that contaminated land causes further pollution then the Emergency Control Procedures stated below must be followed.

Emergency Control Procedures

1. When dealing with known contaminated land and 'run-off' is becoming a problem the Emergency Control Procedures for water pollution must be followed.
2. When dealing with known contaminated land and dust generation is becoming a problem the Emergency Control Procedures for air must be followed.
3. In addition to this all operatives in the area must be issued with dust masks to prevent ingestion of the contaminated materials.
4. Stop work immediately, seal off the area, and report to the Site Manager in the event that one or more of the following are found:
 - Discoloured or oily soil (chemical or oil residues)
 - The soil has a fibrous texture (asbestos)
 - Presence of foreign objects (chemical/oil containers)
 - Evidence of underground structures and storage tanks
 - Existence of waste pits
 - Old drain runs and contamination within building and tanks
5. The contaminated materials must be tested at an approved laboratory to ascertain what hazards may be presented by the substance.
6. Following the receipt of the laboratory results a project specific method statement and risk assessment must be prepared to dispose of/deal with the material. Approval will be needed from the Environment Agency and the Environmental Manager.
7. In the event that a serious environmental incident occurs, contact the company's Environmental Manager and advise the Environment Agency using the 24 hour Emergency line - **0800 80 70 60**

ECOLOGY, ARCHAEOLOGY AND CULTURAL HERITAGE

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to ecology, archaeology, and cultural heritage for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for ecology, archaeology, and cultural heritage on site
- Develop section of the Project Environmental Management Plan to include ecology, archaeology, and cultural heritage
- Ensure all sub-contractors comply with the ecology, archaeology, and cultural heritage guidelines
- Liaise with the Environmental Manager on all ecology, archaeology, and cultural heritage issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan ecology, archaeology, and cultural heritage issues
- Ensure all staff comply with the ecology, archaeology, and cultural heritage guidelines

PROCEDURES

Operational Control Guidelines

1. Any contractual requirements for the preservation, monitoring and management of ecology, archaeology and cultural heritage issues must be prior to the commencement of any works.
2. All areas where ecological, archaeological and cultural heritage issues exist should be highlighted in the Project Environmental Management Plan.
3. Specific risk assessments and method statements must be completed for all operations that may impact on sensitive parts of the site. This is to ensure that all such operations are properly managed and controlled.
4. The Site Manager is responsible for liaising with English Heritage and other interested parties to ensure that no issues are overlooked when planning potentially disruptive works.
5. Strict controls shall be implemented where necessary to ensure that any persistent vegetation such as Japanese Knotweed is not allowed to spread around or off of the site.
6. All permanent and non-permanent employees, including sub-contractors, will be made aware of their responsibilities to ensure that damage to ecology, archaeology and cultural heritage is minimised.

7. In the event that damage to ecology, archaeology and cultural heritage occurs then the Emergency Control Procedures below should be followed.

Emergency Control Procedures

1. In the event that damage to any ecology, archaeology and cultural heritage occurs work must be stopped immediately.
2. The incident must be reported to the Site Manager.
3. The area should then be protected using Heras type fencing or similar.
4. Specialist advice should be sought from relevant organisations such as English Nature or English Heritage.
5. The Environmental Manager must be notified.
6. Special consent may be required before work can recommence from the relevant authority.
7. The reason for the problem occurring must be investigated and any changes made to future operations and programmes.
8. In the event that a serious incident occurs, contact the company's Environmental Manager.

NOISE AND VIBRATION

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to noise and vibration for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for control of noise and vibration on site
- Develop section of the Project Environmental Management Plan to include prevention and control noise and vibration
- Ensure all sub-contractors abide by noise and vibration guidelines
- Liaise with the Environmental Manager for all noise and vibration issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan for environmental noise and vibration issues
- Ensure all staff comply with the noise and vibration guidelines

PROCEDURES

Operational Control Guidelines

1. Requirements regarding the control of noise and vibration levels should be identified so that the appropriate control measures can be implemented.
2. The company's environmental policy and procedures will be taken into account when selecting plant and equipment and when developing safe systems of work.
3. Where it has been identified that buildings and services may be affected by noise and vibration, all necessary control measures are to be highlighted within applicable safe systems of work.
4. In sensitive areas, such as urban and commercial districts, liaison with the Environmental Health Officer will be needed to ensure that noise and vibration levels are maintained within permissible levels.
5. Noise emissions should be regularly monitored and recorded as deemed appropriate.
6. Where necessary vibration will be monitored to ensure that no structural damage is being caused to adjacent buildings and services.

7. Local residents and businesses are to be kept informed of when activities producing excessive noise and vibration are to take place.
8. All operations should be sequenced, where appropriate, to minimise the generation of noise and vibration, and where practical, plant and material stockpiles should be located to absorb noise emissions.
9. Where appropriate, prior consent will be sought from the local authority under Section 61 of the Control of Pollution Act 1974.
10. All employees, sub-contractors and suppliers will be made aware of their responsibilities and duties to ensure that noise and vibration generated by them is correctly managed and controlled.
11. In the event that noise and vibration emissions exceed permissible levels, then the following Emergency Control Procedures are to be followed.

Emergency Control Procedures

1. In the event of noise and vibration limits being exceeded the work or activity causing the noise/vibration is to be stopped.
2. Where appropriate plant is to be re-orientated to re-direct emissions away from sensitive receptors.
3. Where appropriate material is to be stockpiled to provide a noise barrier to absorb noise emissions.
4. Where appropriate erect additional noise barriers.
5. If these steps are unsuccessful in reducing emissions to an acceptable level then working practices and arrangements will be changed accordingly.
6. Monitoring shall take place throughout the operation to ensure compliance.

SUSTAINABLE DEVELOPMENT

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to sustainable development for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for control of on site sustainable development issues
- Develop section of the Project Environmental Management Plan to include control of sustainable development
- Ensure all sub-contractors abide by the sustainable development guidelines
- Liaise with the Environmental Manager for all sustainable development issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan regarding the control of resource consumption
- Ensure all employees are abiding by sustainable development guidelines

PROCEDURES

Operational Control Guidelines

1. All timber including temporary works should, wherever practical, be from a temperate sustainable resource and certified as such from an independent inspection agency accredited by the Forest Stewardship Council (FSC).
2. Peat is not to be imported for use as a soil conditioner for landscaping or planting.
3. Imported soil conditioners will be free from peat and be produced from recycled and renewable materials free from weed seeds, disease and fungal organisms.
4. All materials will be accurately ordered to minimise waste.
5. Where possible the use of recycled materials and other environmentally friendly options should be investigated.
6. During construction the work area will be kept tidy to minimise the risk of damage to materials.
7. All operations will be adequately supervised to ensure that the wastage is kept to a minimum.

8. All plant and office equipment will be turned off when not in use to conserve power/fuel.
9. Where possible the consumption of stationery in all offices will be used conservatively.
10. Waste paper and empty toner cartridges will be recycled.

STATUTORY NUISANCE

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to statutory nuisance for inclusion in a Project Specific Environmental Management Plan.

DEFINITION

Although there is no legal definition of a statutory nuisance, for action to be taken, the nuisance must, or be likely to be prejudicial to a persons health, or interfere with a persons legitimate use and enjoyment of land. This particularly applies to nuisance to neighbours in their homes, offices and gardens.

A statutory nuisance could arise from the poor state of the company's premises or sites, or from any noise, smoke, fumes, gases, dust, steam, smell, effluvia, the keeping of animals', deposits and accumulations of refuse and/or other material, and other discharges from company premises.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for control of statutory nuisance on site
- Develop section of the Project Environmental Management Plan to include prevention and control of statutory nuisance
- Ensure all sub-contractors abide by statutory nuisance guidelines
- Liaise with the Environmental Manager for all statutory nuisance issues

Environmental Manager

- Assist Site Managers in the development of the Project Environmental Management Plan for statutory nuisance issues
- Ensure all staff comply with the statutory nuisance guidelines

PROCEDURES

Operational Control Guidelines

1. The procedures for air pollution, contaminated land, noise and vibration, and water pollution should be followed to prevent any statutory nuisance in these forms.
2. If the site is located adjacent to residential areas then any lighting that is required is to be located to minimise disruption through glare or light pollution.

3. All complaints from local residents are to be collated and where appropriate procedures developed to prevent any recurrence.
4. In the event of an incident involving statutory nuisance the Emergency Control Procedures below must be followed.

Emergency Control Procedures

1. Should any incident surrounding statutory nuisance occur, the appropriate operational procedures, as identified above, must be followed.
2. All complaints shall be recorded and the Environmental Manager shall be notified.
3. Where problems occur regarding site lighting then the lighting shall be relocated to reduce the impact upon the surrounding residents and neighbours.

TRAFFIC MANAGEMENT

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to traffic management for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for traffic management on site and for liaising with the local highway authorities
- Develop the Project Environmental Management Plan to include traffic management proposals
- Ensure all sub-contractors abide by traffic management requirements
- Liaise with the Environmental Manager for all traffic management issues

Environmental Manager

- Assist Site Managers in the development of traffic management proposals for the Project Environmental Management Plan
- Ensure all staff comply with the statutory nuisance guidelines

PROCEDURES

Operational Control Guidelines

1. All traffic management issues identified in the contract documents must be incorporated into the Project Environmental Management Plan.
2. Where appropriate, arrangements for the delivery of materials should take place outside peak hours.
3. All access roads should be regularly monitored for damage and deposition of mud and debris, where mud and debris are found to be a problem, all debris should be quickly removed and the roads kept clean and tidy.
4. All plant should be regularly serviced to ensure that it does not cause excessive pollution and operates safely and efficiently.
5. In the event that a traffic management problem occurs the Emergency Control Procedures below should be followed.

Emergency Control Procedures

1. In the event that the increased numbers of traffic movements adjacent to the site cause problems with congestion, road conditions or noise, then measures should be implemented to minimise them.
2. Where congestion is occurring at the beginning and end of the day, the use of flexible working hours and staggered starting times should be considered.
3. Where excess mud and debris is being deposited on local roads around the site, the incorporation of wheel washes and use of road sweepers should be considered.

WASTE MANAGEMENT

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to waste management for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for waste management on site
- Develop section of the Project Environmental Management Plan to include the management of waste, including the segregation of waste and the use of recycling initiatives
- Ensure all sub-contractors abide by waste management guidelines
- Liaise with the Environmental Manager for all waste management issues

Environmental Manager

- Assist Site Managers in the development of waste management proposals for the Project Environmental Management Plan
- Ensure all staff comply with the waste management guidelines

PROCEDURES

Office Waste Guidelines

1. All consumables and office supplies are to be used conservatively, including the recycling and reuse of supplies where practical.
2. Company paper is only to be used for business purposes and waste paper should be recycled rather than disposed of.
3. The use of double-sided copying and printing should be made wherever practical.
4. Scrap paper will be reused for draft printing whenever possible.
5. Office paper supplies will be discarded separately into segregated and designated recycling bins. All cardboard materials will be discarded separately into respective segregated bins. All other rubbish will be discarded in the normal manner.

OPERATIONAL CONTROL GUIDELINES

1. All work shall be carefully considered and implemented to minimise the generation of waste.

2. Where it has been identified that wastes are to be produced, or potentially produced, by a new project or activity, this will be clearly identified prior to the commencement of the work.
3. Specialist disposal requirements including any Waste Management License issues will be identified prior to commencement.
4. All employees, including sub-contractors will be requested to identify the types of waste that can be reduced, reused, or re-cycled on-site or off-site.
5. All employees, suppliers and sub-contractors will be made aware of their responsibilities to ensure the correct disposal of waste.
6. Where the production of hazardous wastes is envisaged, the Site Manager will liaise with the Environmental Manager and the appropriate Environment Agency office to determine the most appropriate method of disposal.
7. All sites producing hazardous waste must be licensed with the Environment Agency.
8. Waste disposal contractors must possess the appropriate license to dispose of the waste from site. The site manager should periodically check the waste contractor's current license.
9. All waste disposal operations shall comply with the Duty of Care. A Waste Transfer Note/Consignment Notice will accompany all waste transfers. The Waste Transfer Note must be retained for a minimum of three years.
10. The storage requirements for wastes are to be identified to allow for the segregation of the waste and the prevention of odours, water pollution and the cross contamination of materials.
11. In the event of the escape of waste the Emergency Control Procedures below must be followed.

Emergency Control Procedures

Liquid Waste

1. In the event of liquid waste escaping the site manager is to be notified.
2. The Site Manager is to notify the Environmental Manager and the appropriate Environment Agency office.
3. Stop the flow of pollution using earth, sand or polythene and divert away from drains and watercourses.
4. Deploy spill kits as necessary to contain and absorb the spill.
5. Contaminated sand, earth or granules must be disposed of as contaminated material
6. The reasons and cause of the escape must be thoroughly investigated, and recommendations made to prevent a recurrence.

Solid Waste

1. In the event of solid waste escaping the Site Manager is to be notified.
2. The waste that has escaped must be collected and placed into a secure skip.
3. Depending on the hazard presented by the material, specific personal protective equipment may be required.
4. The reasons and cause of the escape must be thoroughly investigated, and recommendations made to prevent a reoccurrence.

Odours from Waste

1. In the event that odours become a problem from waste storage, the skips must be emptied immediately.
2. If similar waste is likely, then covered skips must be used and emptied regularly.

WATER POLLUTION

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards to water pollution for inclusion in a Project Specific Environmental Management Plan.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for prevention of water pollution on site
- Develop section of the Project Environmental Management Plan to include water pollution
- Ensure all sub-contractors abide by the water pollution guidelines
- Liaise with the Environmental Manager and respective Environmental Agency for all water pollution issues

Environmental Manager

- Assist Site Managers in the development of water pollution proposals for the Project Environmental Management Plan
- Ensure all staff comply with the water pollution guidelines

PROCEDURES

The Company will ensure that no contamination of adjacent watercourses and the groundwater will occur as a result of their operations. This will also include minimising the impact of operations upon wildlife habitats, aquatic flora and fauna, fisheries, recreation and amenity facilities and landscape features.

The Company will ensure that any operations that may pose a threat to these areas are carefully planned and managed to minimise the risk of pollution and environmental damage.

Operational Control Guidelines

1. Water quality sampling requirements must be identified and implemented prior to the commencement of any works.
2. The requirement for discharge consents to watercourses, surface water drains or foul drains must also be identified as soon as possible.
3. All watercourses and drainage systems adjacent to the site are to be highlighted in the Project Environmental Management Plan.
4. Suitable storage areas should be prepared to ensure that the quality of surface water and ground water is not put at risk.

5. If appropriate, the need for concrete wash out points will be identified and established on site.
6. All operations that are to take place in, above or adjacent to watercourses will be clearly identified, with specific risk assessments and safe systems of work being established prior to the commencement of any work.
7. All operations taking place in, above or near watercourses must be strictly supervised and monitored to ensure that no pollution incidents occur.
8. All permanent and temporary employees, including sub-contractors, are to be made aware of their responsibilities to ensure that no water pollution incidents occur.
9. In the event that a water pollution incident occurs then the Emergency Control Procedures below must be followed.

Emergency Control Procedures

1. All spillages, including fuel, oils, chemicals and silty run-off, must be reported to the Site Manager.
2. Where appropriate, the Site Manager must notify the Environmental Manager and the appropriate Environment Agency office.
3. The source of pollution must be identified and the flow should be stopped or diverted using spill kits, earth, sand or polythene and diverted away from all drainage systems and watercourses.
4. Where flammable substances are involved, any adjacent sources of ignition must be switched off.
5. An absorbent boom must be placed across watercourses to contain and absorb any spills.
6. Spillages must not be washed into drainage systems or watercourses and detergents must not be used.
7. All absorbent materials used to soak up the spill must be disposed of as contaminated material.
8. The incident is to be investigated with the Environmental Manager. The reasons and cause of the escape must be thoroughly investigated, and recommendations made to prevent a reoccurrence.
9. Details of the investigation and any changes to working practices will be reported to the Environmental Manager and where appropriate to the Environment Agency.
10. In the event that a serious environmental incident occurs, contact the company's Environmental Manager and advise the Environment Agency using the 24 hour Emergency line - **0800 80 70 60**

DELIVERY, STORAGE, REFUELLING AND SPILLS OF FUEL AND CHEMICALS

PURPOSE

The purpose of this procedure is to provide guidance and assistance with the development and production of project specific procedures with regards of the delivery, storage, refuelling, and spillage of fuel and chemicals.

SCOPE

This procedure applies to all employees and operational activities. The responsibilities for implementing the procedure are outlined below.

Site Manager

- Overall responsibility for the control of fuel and chemicals on site
- Development of a specific section for the Project Environmental Management Plan to address the delivery, storage, refuelling, and spills of fuel and chemicals
- Ensure all sub-contractors abide by these guidelines
- Liaise with the Environmental Manager on all issues regarding the delivery, storage, refuelling, and spills of fuel and chemicals

Environmental Manager

- Assist Site Managers in the development of procedures for the delivery, storage, refuelling, and spills of fuel and chemicals, for the Project Environmental Management Plan
- Ensure all staff comply with the guidelines

PROCEDURES

DELIVERIES

All deliveries will be supervised by a competent person capable of dealing with any spills or other incidents that may occur. The level of all storage tanks will be checked before delivery to prevent overfilling and to ensure that the product is delivered to the correct tank.

STORAGE

Fuel, oil and chemical tanks must be sited on an impervious base, within a secure bund. The base and bund must be impermeable to the substance being stored and have sufficient capacity for daily use and for the receipt of additional deliveries. Leaking, damaged or empty tanks/drums must be removed from the site immediately and disposed of via a licensed waste disposal contractor. All bowsers must be banded to prevent any accidental spills.

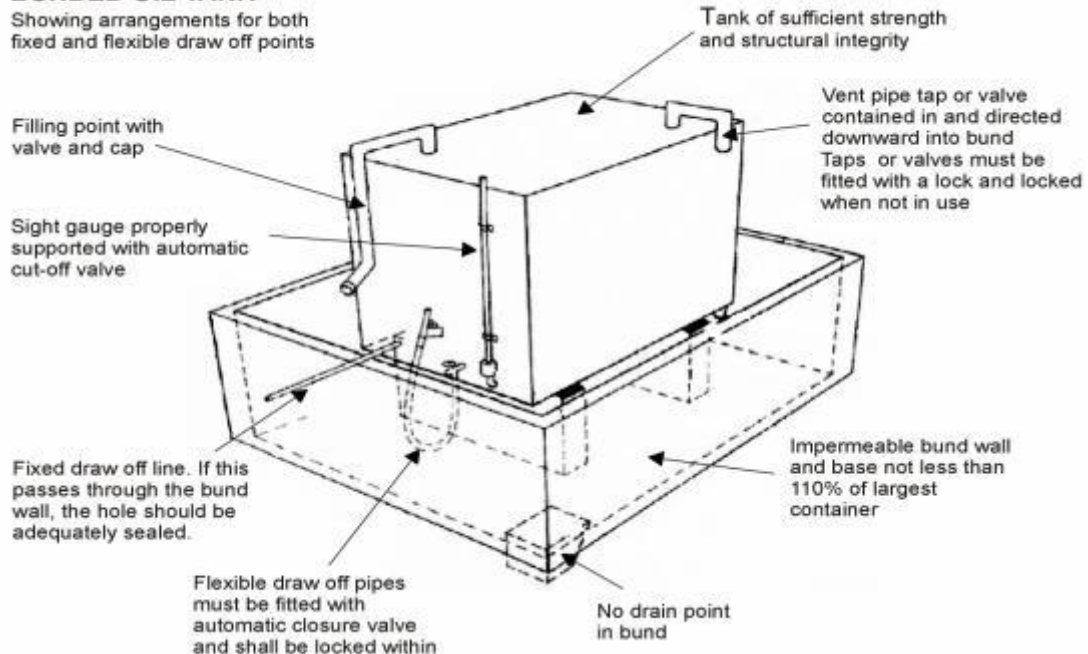
All tanks and containers shall be stored in a secure, locked area, protected from vandalism, and clearly marked with the contents of the substance. To help limit the impact of any spills, all such storage areas should be located at least 10 metres from any drain or watercourse.

Where large quantities of fuel or oil are to be stored on-site, the above ground storage tank should be constructed to the relevant British Standard. The bund should be constructed to contain 110% of the capacity of the storage tank and monitored regularly for any build up of rainwater. Any rainwater from within the bund must be treated as contaminated waste and

should be appropriately disposed of appropriately to eliminate the potential for further pollution. The diagram below highlights the features that are required for the correct storage of fuels and oils.

BUNDED OIL TANK

Showing arrangements for both fixed and flexible draw off points



SECURITY

All valves and trigger guns must be protected from vandalism and unauthorised use. When not in use they should be turned off and securely locked. Any tanks or drums should be stored in a secure container or compound, which should be kept locked when not in use. Bowsers must also be stored within secure compounds when not in use.

REFUELLING

All mobile plant will be refuelled in designated areas on an impermeable surface and away from drains, a spill kit will be available at all times

USE OF PLANT

All fuel operated plant and equipment shall be operated within strict controls, including the use of drip trays to contain any leaks or overflow etc.

SPILLS

Spill kits and absorbent booms shall be available on site, where a risk assessment recommends this, to ensure that in the event of a spillage the environmental impacts are kept to a minimum. In the event of a spillage occurring, this equipment shall be used to help minimise any environmental damage prior to the implementation of more comprehensive solutions. Nominated members of staff will be trained to use and deploy the spill kits in the event of an incident. In a serious emergency, where the spill kits are to be of no use, the Environment



Agency, fire service and ambulance service shall be contacted as necessary dependent on the consequences of the spill. Any method statements shall identify emergency procedures for each operation.

Plant such as mobile generators shall be used in conjunction with drip trays to contain any leaks and overflows.

ENVIRONMENTAL IMPACT/RISK ASSESSMENTS

A key element of the Environmental Protection Act 1990 is to identify the impacts our business operations have on our surrounding environment. The environmental impacts of all work carried out by The Company will be assessed prior to the commencement of any operations which may have an adverse impact on the environment. These assessments will be monitored and reviewed on an annual basis and amended where appropriate to cater for the requirements of specific projects.

All senior managers should consider the impact their operations have on the environment and raise a formal environmental risk assessment using the template provided in Section 3 of this Manual. Guidance covering the areas and elements to be considered within such risk assessments should be drawn from the contents of this Manual, the contract documentation and any site specific requirements.

Sub-contractors and other staff working for The Company should make themselves aware of any assessments that have been undertaken to address the activities that they are carrying out. Any actions that are required to keep these assessments valid and relevant must then be followed.

The basic stages to be adopted when carrying out an environmental risk assessment are as follows:

Stage 1: Hazard identification

Guidance defines a *hazard* as a “property or situation that in particular circumstances could lead to harm”. This may be determined by properties or circumstances and could include, for example, the release of chlorofluorocarbons (CFCs); a tidal surge along a stretch of the coast; a dry summer leading to low river flows; or the planting of a genetically modified crop. Where risk assessments are to be applied, the hazards may be as broad as the adverse impacts of road transport on the environment, or the adverse impacts of induced climate change from the contribution of fossil fuel-derived carbon dioxide emissions.

The identification of relevant hazards will therefore have an important bearing on the overall assessment and the credibility of the final assessment.

One common pitfall in establishing the hazards is to overlook secondary hazards that may arise. For example, during a river flood, sediments may be deposited within the working area. If these sediments were to be contaminated, they might pose an additional hazard.

Stage 2: Identification of consequences

The potential consequences that may arise from any given hazard are inherent to that hazard. Although the full range of potential consequences must be considered at this stage, no account is taken of likely exposure and therefore likely consequences. For example, while the potential consequences of a discharge of toxic metals to a watercourse may be self-evident, a flood may have additional, non-obvious consequences such as pollution arising from an over-stretched sewerage system, or loss of habitats due to river scouring.

These examples help to highlight why it is necessary to take a broad look at the potential environmental damage that may occur, if only to be clear why some potential consequences are rejected for further assessment.

Stage 3: Estimation of the severity of consequences

The consequences of a particular hazard may be actual or potential harm to human health, property or the natural environment. The severity of such consequences can be determined in different ways depending on whether they are being considered as part of a risk screening process, or as part of a more detailed quantification of risk. At all stages of risk assessment several key features need to be considered, as described below.

The spatial scale of the consequences

The geographical scale of harm resulting from an environmental impact will often extend considerably beyond the boundaries of the source of the hazard. Failure to consider this at an early stage may result in the scope of the risk assessment being too limited. For example, a major accident in a chemical plant is likely to have significant effects on the environment well beyond the perimeter of the site.

The temporal scale of the consequences

The duration of the harm that results may be so prolonged that the damage can be assumed to be permanent and the environment beyond recovery. For example, the release of a genetically modified crop could result in extensive cross-breeding with adjacent indigenous flora, any harmful environmental impacts could extend far into the future.

The time to onset of the consequences

A further factor to consider is how quickly harmful effects might be seen. Standard economic techniques tend to discount impacts that will happen in the future but sustainable development emphasises the need to protect the interests of future generations. Risk assessment and management must therefore pay as much attention to long-term problems as to the more immediate risks. For example, the spillage of a solvent on porous ground may not result in an impact on the underlying aquifer for decades. However, once realised, the duration of the harm is likely to be of the order of decades and will compromise the value of that aquifer as a source of water for future generations.

Stage 4: Estimation of the probability of the consequences

The above stages have assumed that realisation of the hazard will lead to environmental harm. However, the probability or likelihood of the consequences occurring must also be taken into account. This has three components:

The probability of the hazard occurring

The probability of the receptors being exposed to the hazard

The probability of harm resulting from exposure to the hazard

Stage 5: Evaluating the significance of a risk

Having determined the likelihood and severity of the consequences that may arise as a result of the hazard, it is important to place them in some sort of context. It is at this point that some value judgements are made, either through reference to some pre-existing measure, such as an environmental quality standard or flood defence standard, or by reference to social, ethical, or political standards.

Options appraisal

Having estimated the magnitude and the significance of the risks posed by the hazard(s), the options for risk management are identified and evaluated. It is important to carry out this procedure as a distinct preliminary step because ill-considered risk management strategies may otherwise result in wasted effort and expenditure on the part of the decision-maker. The options that will usually be available are:

- exploring the acceptability, or otherwise, of the risk - this can include rejecting unacceptable risks altogether or accepting the risk being imposed;
- reducing the hazard through new technology, procedures or investment; or
- mitigating the effects, through improved environmental management techniques.

The decision on precisely which option or combination of options to choose will involve a balance of risk reduction, costs, benefits and social considerations.

ENVIRONMENTAL PERFORMANCE MONITORING AND REVIEW

The Environmental Manager will review the company's environmental performance and the effective implementation of the environmental management policy. The annual review shall cover:

- I. Environmental management monitoring results.
- II. Environmental management inspection results
- III. Comparison with the objectives stated in the previous review.
- IV. Effects and requirements of new legislation or changes to best practice guidance.

Irrespective of time periods, a review shall be conducted in the event of:

- I. Significant environmental incident.
- II. Incidence of Environment Agency enforcement action.
- III. Major change to environmental management arrangements or company activities.

ENVIRONMENTAL MANAGEMENT INFORMATION

The Company will periodically purchase and maintain a selection of key environmental management documents and reference material for use by its staff and employees. These will be retained within the company's offices and requests for additional material shall be made via the Environmental Manager.

An Environmental Management notice board will be erected within the company offices and copies of all Environmental Alerts/Notices and other environmental related information shall be displayed on the notice board.

This Policy has been approved and authorised by:

Name: Abdul Moiz Khan

Position: Managing Director

Date: 01/01/2025

Due for Review by: 01/01/2026

Signature: 