



# JAMES ENGINEERING CONSTRUCTIONS LTD

WOOD STREET NORTH  
MEADOW LANE INDUSTRIAL ESTATE  
ALFRETON  
DERBYSHIRE  
DE55 7JR

TELEPHONE: (01773) 832425

E-MAIL: [contactus@jamesengineering.co.uk](mailto:contactus@jamesengineering.co.uk)

# ENVIRONMENTAL POLICY

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## 1. ENVIRONMENTAL POLICY STATEMENT

It is the policy of James Engineering Constructions Ltd. (hereinafter referred to as "the Company") that the Company will undertake its work, both at its main premises & on its construction & installation sites, in full accordance with environmental protection legislation & codes of practice. The Company accepts its responsibilities in ensuring that its work is designed in such a manner as to minimise its impact on the environment, & that environmental issues are always considered for any tasks undertaken by the Company.

Wherever practicable, preference will be given to methods of working that reduce emissions of noise, dust, waste and fumes. Preference will also be given, wherever practicable, to purchasing products & materials that can be used, recycled &/or disposed of without any residual damaging effect on the environment.

Chris James is the Director responsible for allocating resources & implementing this policy through the management structure of the Company. As "Director with Special Responsibility for Environmental Issues", he is responsible for the operation, monitoring & review of this policy, & for ensuring that the Company complies with environmental legislation & the objectives of this policy, through its selection of environmentally-friendly materials, the conduct of the Company's employees & contracted personnel, & the procedures involved within its working methods. He will be assisted in carrying out these duties by the Company's Health, Safety & Environmental Team, comprising the Company's Health & Safety Officer, & external Retained Advisors on QA & Health, Safety & Environmental issues.

If processes, activities & incidents are to be avoided that are damaging to the environment, everyone within the Company must take into account the impact on the environment of any task they undertake. They must also make contingencies for any damage or incident that could release materials being used or worked on, & ensure that procedures are in place to cope with such incidents, with the minimum adverse effect on the environment. All persons in the Company should strive to design tasks so that they minimise their environmental impact, as far as is reasonably practicable.

Wherever practicable the Company will try to pre-assess, control & document the amounts of waste created on any site, endeavouring to reduce it to the minimum level, through prudent purchasing & recycling policies. Whatever waste is created that cannot be recycled, will be disposed of safely in accordance with environmental legislation.

The Company requires all its employees & sub-contractors to take a proactive role in ensuring that their activities remain environmentally friendly. All persons will have a part to play if high standards are to be achieved and maintained.

The requirements on contract staff & sub-contractors to strive to meet the aims of this environmental policy will be further emphasised through regular site meetings on the larger contracts, or at project briefings on the smaller projects. Suggestions will always be welcomed on how methods of work can be improved to meet this aim.

Signed



Chris James – Managing Director

Date:

9<sup>th</sup> April 2019

## 2. OBJECTIVES

In accordance with the Company's stated aim of reducing the impact that its work has on the environment, the following are specific objectives that it will strive to meet:-

- Accordance with all relevant legislation and agreements, wherever the Company operates.
- Implementation of effective environmental management systems, to ensure that the Company achieves its environmental objectives in an efficient and cost effective manner.
- Developing the environmental awareness of our workforce, and encouraging every employee to act in an environmentally responsible manner. The Company strongly promotes a culture whereby protection of the environment is the responsibility of everybody and it expects all employees, contractors and visitors to behave in an environmentally responsible manner.
- Developing a wider awareness of the environmental impacts associated with the manufacture and use of our products. Communications and bulletins on environmental issues will be undertaken internally (with the workforce) and externally (with sub-contractors and local organisations).
- Responding to any concerns raised by employees and subcontractors relating to environmental matters and reviewing these with the Health, Safety and Environmental Officer.
- Respond to the concerns of local communities and other interested parties on environmental issues, and reviewing these with the Health, Safety and Environmental Officer.
- Improving the environmental performance of our manufacturing operations by reducing emissions, minimising waste and controlling noise.
- Contributing to sustainable development by using energy and raw materials efficiently, thereby optimising our use of natural resources. The Company will focus on the environmental aspects of its products by optimising the use of natural resources and by minimising inputs of raw materials and energy.
- Promoting the recovery and recycling of the Company's products and bi-products.
- Encouraging suppliers and sub-contractors to maintain sound environmental principles and, through their working practices, assisting the Company in meeting its own environmental objectives.
- Respecting the general environment and wildlife habitats in the proximity of the offices, works and contract work locations.
- Ensuring that any temporary, inadvertent, non-compliance is corrected as soon as possible. Where adequate regulations do not exist, internal standards will be adopted that reflect the Company's commitment to the environment.
- Auditing environmental performance and reporting progress on policy objectives on a regular basis via the QA Review Committee.

## 3. MONITORING AND CONTROL

The duty to carry out this policy and to monitor the effects that the Company's activities have on the environment is an essential part of the responsibility of every person working for or contracted to the Company. Every person employed by the Company (including sub-contractors) has a duty to ensure that the harmful effects on the environment of their activities are minimised and that the Company's activities do not infringe upon the requirements of environmental protection legislation. Managers, supervisors and all persons responsible for the design of the various tasks and operations undertaken by the company have a responsibility in this area, and must be aware of the need to:-

- Design tasks and select methods of working such that the impact of the activity on the environment is minimised.
- Minimise the use of hazardous substances and processes, by choosing less hazardous materials or processes, wherever alternatives are possible.
- Reduce the level of noise created by their activities, and use "quiet" plant or equipment where possible.
- Ensure that the Company disposes of waste in a responsible manner within current legislation and that proper recording processes are maintained.

#### 4. WORKING METHODS

The Company will design tasks using working methods and equipment which minimise the risks to the health and safety of employees, subcontractors and all third parties, and seek to minimise the impact of the tasks on the environment.

This applies both to work conducted at its workshop premises and for on-site operations.

Task designers must take into account all the effects of a task on the immediate working area, and any adjacent areas. Pollution is to be avoided at all costs, whether created by gases, liquids, dust, fumes or noise.

Whenever an accidental release of a hazardous substance occurs, management and supervisors must take every step to ensure that the substance is recovered before its effects become serious (e.g. liquids released into the drainage system or dangerous levels of gases released into the air). COSHH risk assessments will give guidance on how hazardous substances can be safely recovered.

#### 5. SUSTAINABILITY

The Company recognises the vital importance of an environmentally and socially sustainable approach to actions which are directly or indirectly affected by their corporate activities.

Wherever practicable, working methods will be designed, adopted and implemented to reduce the impact of the activities of the company on the human, sociological, economic systems within the environment.

All employees of the company will be made aware of how the foregoing considerations relate to the activities of the company and affect the way in which tasks are conducted.

**N.B. Environmental issues will be an integral issue covered in employee training at all levels.**

The Company will implement and maintain those policies and systems which optimise the impact of Company activities on socio-economic and environmental issues. As an essential part of its environmental management procedures, the Company will seek to evaluate and control the following items, with the objective of achieving ongoing improvement in their carbon emission reduction strategies by:

- A reduction in overall corporate motor vehicle mileage, by careful planning of all journeys involving commercial transportation and passenger vehicles, owned and operated by the Company.
- The adoption of a purchasing policy, especially in relation to consumables, which seeks to source environmentally friendly materials, minimises amounts of waste created and, where possible, can be sourced locally to minimise travel distances.
- The development and ongoing extension, as far as is practicable, of a management and data recording system that minimises the use of the paper.
- The collection, segregation and recycling of all re-usable materials generated by the commercial activities of the Company, especially scrap metal and paper.
- The minimisation of environmentally harmful gaseous emissions or fumes, and harmful liquid waste from manufacturing activities, by the careful selection of related working methods and consumable process and components (e.g. paint solvents).

#### 6. NOISE

Noise can be a problem, both to workers involved in noisy operations and processes, and to other persons in the vicinity of those operations or processes. Noise-induced hearing loss can and should be avoided. The Noise at Work Regulations 2005 require employers to reduce the noise levels of their operations, whenever practicable.

The Company and their nominated subcontractors recognise their responsibility to ensure that the necessary steps are taken to minimise noise levels and the effects of any noisy operations on the environment.

When purchasing or hiring plant, consideration will be given to noise emissions from that plant. Purchasing managers will ensure that data on noise levels, both at the operator position, as well as exposure levels external to the machines, are supplied by the manufacturers. Noise levels are often also indicated on the machine. Priority consideration will be given to procuring plant and equipment which emits the lowest noise levels, as long as it is practicable for use.

Parties will not be in areas where they are exposed to excessive noise levels (i.e. above the first action level).

## 7. CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH (COSHH)

Hazardous substances are potentially damaging to health and safety and environment, whenever and wherever they are stored and/or used. The Company has a policy of using less hazardous alternatives, wherever practicable, and minimising the storage and use of hazardous substances and processes. The Control of Substances Hazardous to Health Regulations 2002 (rev 2005) impose a duty on every employer to:

- Identify all substances in use, or likely to be encountered, which could be hazardous to the health of employees (and others)  
and
- Assess the risk to their employees (and others) from the substance, taking into account the manner in which it is being used and the quantities involved.

### 7.1 Identifying Hazardous Substances

A "**Substance Hazardous to Health**" is any substance (including any preparation) that is:-

- A substance that has a specified exposure standard, as listed in HSE document EH40 "Workplace Exposure Limits".
- A biological agent.
- Dust of any kind, when present at a substantial concentration in air.

### 7.2 COSHH Assessments

The risk associated with the use of the substance must be assessed by having a systematic review and asking:

- What quantities of substance are involved?
- What form is the substance in? i.e. liquid, dust, solid, vapour.
- How can it harm someone or something? Eg. by inhalation, by skin contact, by absorption through the skin, by ingestion.
- Who or what could be exposed to the substance and for how long – **including the effects of environmental pollution?**

The question must always be asked - does the hazardous substance have to be used or can a non-hazardous substance be substituted?

### 7.3 Information, Instruction and Training

Under COSHH regulations, employers must ensure that employees who are required to work with a hazardous substance, **and other persons who may become exposed to that substance**, have the necessary information, instruction and training to carry out the work without risk to their health, or of putting the health of third parties at risk. In particular, COSHH assessments should contain the following information:-

- The hazardous substances in the product.
- The potential risks to health.
- The possible routes of entry into the body.
- The precautions that must be taken in storage and usage.
- Emergency measures for first aid and fire.
- Cleaning up instructions to minimise environmental damage in the case of accidental spillage or release.

## 8. TRANSPORT POLICY

The Company is aware of the environmental pollution created by transportation. As such, it is committed to the reduction of carbon emissions caused by travelling personnel and good deliveries. The following have been adopted as measures by the Company:-

Diesel cars and vans are used by the Company because of their fuel efficiency and individual vehicles will be selected on the basis of having low carbon emissions.

Deliveries to site will be made using the Company's own vehicles, maintained and serviced in accordance with manufacturers' recommendations.

Where possible, site personnel will travel in these vehicles, together with any site equipment required.

Overnight stays will be arranged as required, to cut down travelling distance to and from site.

The appointed Contract Manager will travel to site using public transport whenever and wherever practicable.

## 9. WASTE DISPOSAL AND ENVIRONMENTAL PROTECTION

Anyone who “imports, produces, carries, keeps, treats or disposes of any controlled waste, or a broker who has control of such waste” is subject to a Duty of Care regarding the disposal of that waste.

Controlled waste is defined as any household, commercial or industrial waste, including building and demolition waste. Therefore, all waste that leaves site is defined as controlled waste and must only be moved after a transfer note has been issued.

### 9.1 The Duty of Care

The “Duty of Care” states that all those subject to it must:-

- Prevent others from depositing, storing, treating or otherwise disposing of waste without a valid licence or contravening the licence conditions; or act in a manner likely to cause environmental pollution or harm to human health.
- Prevent the waste from escaping
- Ensure that waste is transferred to an authorised person
- Include with the waste transfer a written description to enable others to comply with the duty and avoid committing an offence.

### 9.2 Definitions

- **Waste Producer** - The waste producer is the party undertaking the work which creates waste.
- **Waste Manager** - A person who keeps, treats or disposes of controlled waste.
- **Waste Broker** - A person who arranges the transfer of waste but does not himself control what happens to it.
- **Waste Carrier** - A person who transports waste. The carrier should be registered with a waste regulation authority and have a licence to confirm this registration.

### 9.3 Duties of a Waste Producer

A waste producer is responsible for providing an accurate description of the waste, including:-

- The type of premises or business from which the waste is generated.
- The process that produces the waste and the quantity of waste.
- The name of substances which comprise the waste, including a physical and chemical analysis, if applicable.

The waste producer is also responsible for:-

- The care of the waste whilst he holds it.
- The packaging of the waste to prevent its escape during transfer.
- Using a registered (or exempt) carrier to transport the waste.
- The final disposal of the waste, depending on the degree of his involvement in the selection of the waste carrier, manager or broker.

Any suspicious circumstances, that may indicate a breach of the duty in the disposal chain, should be reported to the Waste Regulations Authority.

### 9.4 Duties of a Waste Carrier

The Waste Carrier is responsible for:-

- The adequacy of packaging and security of the waste whilst under his control.
- Ensuring that a description accompanies the waste and that this description is accurate.
- Ensuring that any alteration to the waste is recorded in the description of the waste.

Any requests for contract vehicles to transport waste must be made to the Site Manager or manager in charge of the contract, who should ENSURE that the contractor is registered for the transport of waste.

### 9.5 Duties of a Waste Manager

The Waste Manager is responsible for:-

- Carrying out the disposal operation in accordance with the conditions of the Waste Regulation Authority Licence.
- Checking the description of the waste they receive. Sample checks on the composition are considered to be “good practice” and should be implemented.
- Ensuring that correctly completed documentation accompanies the waste.

### 9.6 Waste Transfer Notes and Consignment Notes

A waste transfer note or a special waste consignment note must be issued before any waste is transported off site.

### 9.7 Completion of Site

On completion of the site, all **Waste Transfer Notes** and **Special Waste Consignment Notes** should be archived with the contract papers and retained:-

- for a period of 2 years in the case of transfer notes.
- for a period of 3 years in the case of special waste consignment notes.

**10. INCIDENT REPORTING AND HANDLING COMPLAINTS**

The Company's Health and Safety Policy details arrangements for the reporting of serious incidents. If it is suspected that an accidental release of a hazardous substance has occurred, that is likely to have a polluting effect on the environment, then both Health and Safety Executive and the local Environmental Health Department, must be informed immediately.

Neighbouring areas should also be informed, especially if persons or livestock are present.

Complaints regarding reported spillages or environmental emissions of fumes, mists, noise or dust must be notified to the Health, Safety and Environmental Team and the Director Responsible for Environmental Issues, who will discuss the complaint with the Contract Manager, Site Manager and other relevant parties, including the appropriate statutory authorities, such as the Environmental Health Department of the relevant local authority, and/or the Environment Agency.