Environmental Policy

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Introduction

A first step in demonstrating environmental responsibility should be to draft an environmental policy statement or code of practice against which the company is willing to be judged. This has to be a worthwhile and practical document and not something that contains platitudes and generalisations.

Planned prevention or reduction of pollution is more cost effective than cleaning up environmental pollution. It is therefore in the interest of the company to minimise the waste and pollution so to reduce costs in the long term.

Consideration will be given to devising codes of practice for all employees and workers, which will include consideration and mitigation of environmental impact of each operation. Each employee will be offered a copy of this environmental policy (which can be emailed to save paper) or a handbook, which will identify their responsibilities towards the achieving company’s mission statement.

The company’s environmental policy will start from the premises that the company is part of the local community and it has impact on the environment in the immediate vicinity of the site and more widely by bringing in raw materials and energy, distributing its products and discharging emissions and waste.

The system has also been developed to comply with the requirements of ISO 14001:2004 the specification for environmental management systems by planning, implementing, checking and acting to improve environmental performance. TRAD’s EMS promotes the ISO’s requirements for Plan-Do-Check-Act (PDCA) to ensure continual improvement:

The system’s methodology is as follows:

- **Plan**: establish the objectives and processes necessary to deliver results in accordance with the organisation’s Environmental Policy;
- **Do**: implement the processes;
- **Check**: monitor and measure processes against the Environmental Policy, objectives, legal and other requirements, and report the results;
- **Act**: take actions to continually improve environmental performance.

**Note**: please also refer to TRAD’s Environmental Manual, which fully details how TRAD comply with our policy: *TRAD-Man-002 Environmental Manual for 14001*. 
Written policies and the policy decision making process of the organisation are covered in this element of the Environmental Management System (EMS); these include the selection of resources and information, the design and operation of working systems and the design and delivery of product and services.

This document is the written policy of the Company creating a foundation for the EMS and to fulfil our responsibility to its employees and others, by the spirit and letter of the law.

The Company recognise that to be successful in achieving the high standards of environmental performance it aspires to, we need an effective environmental policy, which contributes to the overall business performance.
ENVIRONMENTAL MISSION STATEMENT

The objective of Trad Scaffolding Ltd is to run its operations avoiding unnecessary or unacceptable effects on the environment. Any effects will be minimised as far as practicable. Environmental considerations will be given equal importance to the more traditional business issues such as production, research, sales, safety and finance.

The company will keep an up to date list of environmental legislation, which the company will revise when necessary, and the compliance of which will form the basis of the Environmental Management System and Policy. The company is committed to complying with all such applicable legal requirements, and with other requirements to which the company subscribes, to prevention of pollution and firmly state that at no time will our environmental mission statement be compromised for any other objective.

The company will work towards achieving its environmental objectives by:

- Minimising the impact of all its operations on the local and global environment and the quality of life of the local communities in which the Company operates;
- Meeting all relevant statutory regulations;
- Aiming for efficient use of all resources used in its operations, by reduction of waste through process improvements, recycling of material wherever feasible and positive steps taken to conserve resources, particularly those that are scarce or non-renewable;
- Fully considering the environmental effects of any significant new development;
- Working with suppliers to ensure that the products/services they supply are environmentally acceptable;
- Providing the necessary information to enable employees and workers to operate the processes properly and with minimal effects on the environment;
- Ensuring that our waste is disposed of correctly as part of our Duty of Care in line with legislation.

To ensure that this Policy can be successfully implemented, TRAD’s Senior Management will provide such funds as is reasonably necessary including the resources for creating the framework for setting and reviewing environmental objectives and targets.

Where the company conduct works, which may have an effect on the environment, careful planning will be implemented to reduce the risk of pollution. Trad recognises that such incidents are avoidable, and the measures to avoid pollution can in most instances cost very little if included at the planning stage. When planning works it may be suitable to prepare an Environmental Plan, which will accompany the Principal Contractors Health and Safety Plan where required, and provide guidance on reducing the impact of works on the surrounding areas, nearby watercourses and the environmental as a whole.

The company operates an Environmental Management System based upon a process of ‘Continuous Improvement’ in line with ISO 14001:2015, and this Policy shall be implemented and maintained by the SHEQ Directors and communicated to all persons working for or on behalf of the company and made available to the public on TRAD’s website.

This Policy shall be reviewed as a minimum annually and kept up to date by the SHEQ Directors named below, to take into account changes in legislation and guidance, and learnt lessons from incidents and near misses, and remain relevant and appropriate to the company, reflect changes in the nature and range of activities carried out by the company and take advantage of operational experience, negative and positive, as often as may be necessary.

For and on behalf of Trad Scaffolding Company Limited

Chris Smith  
(Divisional Director and SHEQ Director)  
Dated: 11th January 2016

Peter McShane  
(Divisional Director and SHEQ Director)  
Dated: 11th January 2016
Board of Directors including
Des Moore, Group Managing Director
Neil Garner, Trad Scaffolding Co Ltd, Managing Director

Chris Smith & Peter McShane
SHEQ Directors
(and Divisional Directors)
(Responsible for ensuring Safety, Health,
Environment and Quality)

Senior Contacts Managers will deputise for
Divisional Directors during holidays and illness etc.

Senior Contacts Supervisors will deputise for
Managers during holidays and illness etc.

Contacts Managers will deputise for
Supervisors when required. (Including using
Project Supervisors where required) during
holidays and illness etc.

Contacts Supervisors will arrange for
Foremen to deputise for Project Supervisors
where required

Indicates a routing for advice, inspection,
consultation and communication

Indicates management responsibilities
BOARD OF DIRECTORS

The Board of Directors will ensure insofar as is possible establish and maintain environmental policies for all operations that may have a detrimental effect on the environment. This objective shall be achieved by:

- The allocation of responsibilities to personnel employed or controlled by the Company;
- Having available such in-house expertise and external consultants as may be required;
- Requiring that such training, instruction, monitoring and information is arranged and presented as and when required;
- Maintaining a Director with special responsibility for the environmental management programme and its implementation.

The Board of Directors shall initiate, commission, encourage and support such environmental management initiatives as may be required by change of statutes passed by Parliament. The Board of Directors shall ensure that adequate and suitable funds are allocated each financial year, to allow those responsible for the environmental management programme to carry out their duties and duty of care without financial hindrance.

SHEQ DIRECTORS WITH SPECIAL RESPONSIBILITY FOR THE ENVIRONMENTAL MANAGEMENT PROGRAMME

Mr Chris Smith and Mr Peter McShane, SHEQ Directors (and Divisional Directors), shall have the full support and commitment from Fellow Directors (including Divisional Director Mr Tony Mileham), executives, managers, employees and workers. Mr Chris Smith and Mr Peter McShane shall report regularly (and at least once a month) to the Managing Director on matters influencing the environmental management requirements and the standards achieved by the company.

Mr Chris Smith and Mr Peter McShane SHEQ Directors with special responsibility for environmental management shall also make available the services of the environmental consultant to the SHE Manager/Officer (and other members of the management team) on matters influencing environmental management, which will include:

- Keeping the SHEQ Directors, H&S Manager/Adviser, and management informed of the existing and pending legislation regarding environmental management and their impact on working practices;
- Proposes suitable and adequate continuing environmental training for all employees and workers including environmental inductions for all new starters and sub-contractors;
- Maintaining and co-ordinating the environmental management system;
- Investigating environmental incidents that have or may rise to a loss of company resources and reports all statistics causes and results of investigations;
- Liaise with the Environmental Agency and other enforcing agencies;
- Assisting environmental risk assessors in carrying out statutory assessments;
- At the request of managers carries out COSHH assessments on new substances, controls;
- Maintaining and improving company emergency procedures.
ENVIRONMENTAL CONSULTANTS

The Company employs the services of Safety & Access Limited as independent safety, health and environmental consultants to provide professional assistance and guidance to support the line-management and in-house SHE Department. They are appointed as competent advisors and help discharge the Company’s duties.

The Safety, Health and Environmental Consultants are responsible for keeping the Company up to date with new and changing environmental legislation, case law, and best practice and of supplying a full list of relevant legislation and best practice with which the company must comply.

IN-HOUSE SHE (SAFETY, HEALTH, ENVIRONMENT) TEAM

The Company employs a SHE (Safety, Health & Environmental) Manager, SHE Advisor and SHE Co-ordinator to monitor and improve SHE within the company with assistance from our SHE Consultants, Safety & Access and help discharge the Company’s duties, including revising any TRAD Policy, Procedure, Manual or Form with changes to legislation.

DIRECTORS/MANAGERS

All company directors/managers are responsible for the environmental safety of staff, customers and visitors within their areas of responsibility.

They are also responsible for:

- Providing procedures and instructions for safe working practices;
- Ensuring staff under their responsibility are suitably trained and competent for their duties;
- Assessing for risks to the environment from work activities and working conditions;
- Monitoring operations regularly to ensure that work continues to be carried out environmentally safely in accordance with procedures and instructions provided;
- Ensuring that equipment performs correctly and is environmentally safe to operate;
- Monitoring environmental matters in their areas of supervision by inspection or audit;
- Ensuring that all environmental damage or near miss incidents are reported and investigated and that investigating results are passed directly onto Mr Chris Smith and Mr Peter McShane immediately;
- Ensuring environmental safety is designed into all activities and equipment prior to the commencement of work in order to eliminate or control risks;
- Ensuring that employees, workers and contractors are aware of the correct procedures for dealing with materials spillage's and disposal of hazardous waste in a manner that is both safe and environmentally responsible;
- Ensuring that employees, workers, and contractors are aware of the arrangements and actions required in the event of an environmental incident;
- Providing adequate staff supervision particularly for young workers, new employees, workers, contractors, or employees carrying out unfamiliar tasks.
EMPLOYEES AND WORKERS

The co-operation of every person employed by the company is essential to the success of the environmental policy.

The company’s environmental policy places duties on all employees and workers. These are:

- To follow the company’s environmental rules and procedures;
- To minimise waste and recycle waste materials wherever practical;
- To comply with clients environmental requirements when operating on their premises.

All employees and workers have a duty to comply with all the Company environmental rules, procedures and instructions laid down.

- They must report promptly to their manager any defects found in vehicles, equipment or any environmental hazard observed;
- They must report immediately to their manager any incident involving environmental damage or risk;
- Observe all laid down procedures concerning processes, materials and substances used;
- Where required, attend as requested any training course designed to further the need of environmental matters;
- Observe all emergency and evacuation procedures in place.

ENVIRONMENTAL IMPLEMENTATION STANDARDS

TRAD will comply with all legal obligations and to standards with which the company subscribes, including the Policy Statements regarding sustainability. The appointed Safety, Health, Environmental and Quality consultants are responsible for keeping the Company up to date with developments in environmental legislation, case law, and best practice and will supply the Company with a full list of legislation and best practice with which the Company will comply.

The company will ensure that a document is prepared covering the environmental aspects of their operations (TRAD-PRO-056 - Environmental Impacts Register). This document should identify the hazards within the workplace, which may present risk to the environment. Systems for eliminating or reducing these risks and for the complying with the environmental standards shall be identified along with methods for monitoring the effectiveness of the procedures.

Each document shall include the following items:

- The provision of, instruction and training;
- Environmental performance standards;
- Environmental incident investigation and reporting;
- Auditing procedures;
- Environmental improvement programme.
ENVIRONMENTAL IMPROVEMENT PROGRAMME

The SHE Department manager will prepare annually an environmental improvement programme, which will be documented in the Manual and will include plans in each of the following areas:

- Objectives;
- Audit programme;
- Training needs;
- Review of resources to support the programme.

These items will be discussed in the integrated SHEQ Review Meetings (please see the next item). TRAD are engaged in a behavioural programme (which is mainly Health & Safety based as TRAD work in a high hazard industry), but one of the 5 Key Safe Behaviours and Conditions is Housekeeping which is a Key environmental consideration (please see the next page).

- TRAD’s Behavioural Programme: Play it Safe.
As part of that programme, the Safety Leadership Team visit a variety of sites per month and discuss the Safe System of Work (which includes environmental considerations) and encourage Near Miss reporting (including near reporting of environmental near misses).

INTEGRATED SHEQ REVIEW MEETINGS

To ensure that the SHE team achieve excellence in environmental performance we need to regularly evaluate our performance in order to maximise learning and take appropriate action, thus ensuring ‘Continuous Improvement’.

Safety, Health, Environment and Quality are integrated into the weekly formal SHEQ review meetings.

An agenda must be set and minutes of the meeting taken to record findings and actions. The SHEQ Meeting Minutes will document the objectives, targets and programmes of the EMS. Minutes of all SHEQ meetings will be retained. The agenda of each meeting must include the following items:

- Environmental Incident Performance;
- Significant issues raised from formal monitoring and auditing.
INTEGRATED SHEQ REVIEW MEETINGS (MANAGEMENT REVIEW)

In addition to the integrated SHEQ weekly meetings a quarterly Management review meeting will be held with the Senior Management to monitor implementation and development of the Environmental Management System and overall environmental performance and effective operational control.

These management meetings shall review our company’s EMS to ensure its continued suitability, adequacy and effectiveness. The reviews will include assessing opportunities for improvement and any required changes to the EMS (including the environmental policy, objectives and targets), with all records retained. Minutes of all SHEQ review meetings will be retained.

At each quarterly management meeting the SHE Team will review the following:

a) Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the company subscribes;

b) Communications from external interested parties (including any complaints);

c) The environmental performance of the company;

d) The extent to which objectives and targets have been met;

e) The status of corrective and preventative actions;

f) Follow up actions from previous management reviews;

g) Any changing circumstances including developments in legal and any other requirements related to its environmental aspects;

h) Any recommendations for improvement.

The outputs from these management reviews shall include any decisions and actions related to possible changes to the environmental policy, objectives, targets and other elements of the EMS, which are consistent with TRAD’s commitment to continual improvement.

ASSESSMENT OF SUBCONTRACTORS

Subcontractors will be required to demonstrate to Trad Scaffolding Company Limited in advance of being selected for any contract, their commitment to Environmental management. As such, Subcontractors will be required to complete and return the Company Contractors environmental questionnaire. Failure to provide satisfactory responses to the questions and or provide suitable supporting documents raised will hinder any works to be undertaken by the relevant Company.

The Contractors environmental questionnaire can be found in TRAD forms on the shared drive.

EMERGENCY PREPARATIONS

TRAD will establish, implement and maintain a procedure to identify potential emergency situations and potential accidents that can have an impact on the environment and how we intend to respond to the emergency.

TRAD will respond to actual emergency situations including environmental incidents as detailed in the procedures to prevent an escalation or to mitigate associated adverse environmental impacts.

Periodically, the company will test emergency procedures where practicable (or where impracticable, will carry out a recorded desktop scenario of an incident and the response required).
ENVIRONMENTAL IMPACT ASSESSMENTS

Before the introduction of new plant or processes, a systematic study will be undertaken to ensure that adequate consideration is given to possible environmental hazards as a minimum this will include:

- Identification of substances that may cause harm to the environment;
- Assessments of the techniques available to eliminate, minimise or render harmless releases of such substances as to establish “best environmental techniques” (BAT);
- An assessment of the possible impact of the process on the environment to establish “Best practical environmental option” (BEPEO);
- Where existing installations and processes there is a record of poor environmental performance the process/installation should be assessed and included in the environmental improvement programme.

REDUCE

The company will within its EMS shall reduce any packaging material where practicable.

RE-USE

The company will within its EMS re-use any material where practicable. For instance, TRAD will cut down any scaffold board down to its next available length if a section of board is damaged. Boards will continue to be inspected and used and cut down and over a period of time and when at the end the shortest boards will be used for soleboards and any other boards will be sold as second hand timber (e.g. on eBay).

The company will purchase galvanised second hand tube where practicable (which is deemed by the NASC as safe and sufficient for operation).

RECYCLING

The company will within its environmental management systems identify those materials that are subject to disposal by normal methods and assess if recycling is an option for their disposal.

Where practicable, the company will make the necessary arrangements for the recycling of:

- Paper;
- Cardboard;
- Timber (which will also be offered for sale on eBay);
- Metals (e.g. steel);
- Any other natural products that can be recycled.
ENERGY

The company will assess and implement methods of conserving energy with its operations by simple practical solutions. The company identify that saving energy is financially the right thing to do as well as environmentally sound.

USING CONSULTANTS

Where the company identifies a need for the use of external consultants it will ensure that the appointed consultant provides:

- The service that the company requires;
- Within the price the company requires;
- Within the time constraints the company sets; and
- At the standard the company sets.
OPERATIONS

The Divisional Directors, Transport Manager and Yard Manager are responsible for planning all operations to ensure that the work is carried out in accordance with TRAD procedures and Risk Assessment/Method Statements (RAMS) to control situations where their absence could lead to deviation from environmental policy, objectives and targets.

Divisional Directors will ensure that their Managers and Supervisors follow NASC Guidance and TRAD’s Environmental Policy and Procedures including the following:

- TRAD-PRO-001 - Working at Height;
- TRAD-PRO-008 - Accident, Incident Reporting & Investigation Procedure;
- TRAD-PRO-009 - Risk Assessment & Method Statement (RAMS) Writing Procedure;
- TRAD-PRO-019 - CDM Procedure;
- TRAD-PRO-021 - Sharps & Clinical Waste;
- TRAD-PRO-030 - Sourcing of Goods and Products Procedure
- TRAD-PRO-044 - Control of Substances Hazardous to Health;
- TRAD-PRO-048 - Standard Operating Procedures (non-licensed Asbestos work);
- TRAD-PRO-056 - Environmental Impacts Register.

The Transport Manager will ensure that they and their operatives follow TRAD’s Environmental Policy and Procedures including the following:

- TRAD-PRO-038 - Transport Procedures;
- TRAD-PRO-040 - LGV Vehicles, Forklifts and Trailers Operating Procedure;
- TRAD-PRO-041 - (Allumi Guide);
- TRAD-PRO-041 - Vehicle Lifting Equipment;
- TRAD-PRO-056 - Environmental Impacts Register.

The Yard Manager will ensure that they and their operatives follow TRAD’s Environmental Policy and Procedures including the following:

- TRAD-PRO-039 - Yard Operations Procedure;
- TRAD-PRO-056 - Environmental Impacts Register.
TRANSPORT

The company will assess and implement methods of reducing fuel and pollution with its operations by simple practical solutions. The company identify that reducing fuel costs and pollution output is financially the right thing to do as well as environmentally sound.

The company will achieve this by:

- Purchasing modern efficient vehicles when replacing old fleet vehicles;
- Working towards the best available Euro fleet or alternative fuel standard such as hybrid;
- The use of fuel additives (Adblue) to reduce exhaust emissions;
- Training drivers to drive more efficiently and use less fuel;
- Encouraging drivers to use Oyster Cards rather than vehicle use;
- Planning journeys to produce a more efficient route to destinations.

COMPETENCE, TRAINING & AWARENESS

TRAD Scaffolding recognises its general duty to employees and workers to provide all necessary information, instruction, training and supervision. To this ends the company continuously assesses the competency level of all employees and where applicable sub-contractors.

Periodically, we carry out an organisational training needs analysis (TNA) of all activities to establish minimum competency levels and identify any training requirements. Following a TNA, training programmes are developed to fulfil those minimum competency levels. TNA is a form of risk assessment, although the normal risk assessment process shall identify additional training requirements.

Training for competence at The Company is divided into four main categories:

1. **Induction training** for all new starters
2. **Skill training** for management and trade competence
3. **Safety, Health & Environmental** e.g. SMSTS Certification for all line-management and the Construction Skills Health & Safety Test for all scaffolding operatives.
4. **Modular training** in the form of toolbox talks and task specific briefings

PROVISION OF INFORMATION, INSTRUCTION AND TRAINING

The company will ensure that the methods by which suitable information, instruction and training will be delivered, is by formal environmental induction training, team talks and standing operational work standards.

The company will make available to employees and workers any statutory instruments, codes of practice and company procedures as required. Where any training is given the SHE co-ordinator will keep suitable records.
TRAINING RECORDS

Where required, Head Office shall maintain training records in the personnel files with copies of certification.

A training and skills matrix shall be maintained as a quick reference guide when allocating duties to individuals and as a means of monitoring validation periods, to ensure refreshers are undertaken.

COMMUNICATION OF INFORMATION

TRAD will ensure that the company establishes, implement and maintain procedures for communication to all staff, employees, workers and external interested parties. Additionally, TRAD has documented procedures for receiving, documenting and responding to relevant communication from external interested parties such as TRAD-PRO-008 - Accident, Incident Reporting & Investigation Procedure.

The company does not at present communicate externally about its significant environmental aspects.

FORMAL COMMUNICATIONS

To ensure the effective communication of important information The Company uses the following formal systems:

- Work Instructions
- Memorandums & General Notices
- Guidance Notes
- Bulletins
- Facebook Page

Information Bulletins are a system for communicating up-to-environmental information. Important issues, such as incident learning to be shared will be compiled and issued to all employees, as necessary.

Copies of such written information should also be posted on the notice boards. For personnel with access to the Company’s computer network may be sent this information electronically.

Certain formal communications may require the recipient to sign and return an acknowledgement slip accepting that they have received, read and understood the communication.

The company will maintain procedures for internal communications among all levels and functions of the organisation, including communication with contractors and visitors to the workplace and for receiving, documenting and responding to relevant communications from external organisations including clients and the Environmental Agency.

NOTICE BOARDS

A notice board(s) for posting environmental information must be in common areas of the site/office accommodation and welfare and is currently in two places, Head Office kitchen and Yard welfare facilities to ensure that all have full access.
INDUCTION TRAINING

Every new employee shall receive induction training, before commencing work, which includes environmental briefings, to ensure that they are not exposed to unfamiliar hazards. An induction training package is maintained at head office to ensure that all essential information is covered.

The induction is recognised as an opportunity to convey the management beliefs and company values for environmental management and to help influence the attitudes of all new starters.

A record of induction must be kept, signed by the inductee as an acknowledgement that they have understood the content.

RAMS BRIEFINGS

Every employee and worker shall be briefed on environmental information during induction and during Risk Assessment/Method Statement (RAMS) briefings. Inside all the RAMS documents is the information required to provide each employee and worker with written key environmental information, including policy, procedures and guidance.

The Environmental Information contained in the RAMS must be reviewed periodically and up-dated to ensure that it remains current. Following the up-date it must be re-issued.

MODULAR TRAINING (TOOL BOX TALKS)

Modular training in the form of toolbox talks is used to help increase and maintain general levels of environmental awareness. A schedule of monthly toolbox talk topic must be prepared for a six-month period.

Additional general toolbox talks are a useful medium for general day to day communication of information such as sharing accident learning or introducing best practice and each Supervisor can establish their own frequency of toolbox talks, as necessary (e.g. weekly, fortnightly). However, every operative must receive at least one toolbox talk per calendar month, covering a specific topic, as a minimum, with records retained.

The ‘toolbox talk’ medium can be used to help disseminate essential environmental information throughout the organisation.

It is important to solicit information from the workforce and receive feedback on environmental issues. A few moments should be taken at the end of each toolbox talk giving the opportunity to raise and discuss issues.

NUISANCE

Construction sites have the potential to cause various nuisances to the general public and to neighbours including:

- Noise and vibration;
- Dust and odour;
- Traffic and vehicle;
- Site workers;
- Lighting and visual impact.
Some of these nuisances are considered as Statutory Nuisance, nuisances against the law as defined by the Environmental Protection Act of 1990. TRAD operates as a considerate contractor, which helps to ensure that good practice is maintained in respect of minimising nuisance.

TRAD details in the site specific RAMS how the company shall ensure that nuisance is kept to a minimum.

**CONTROL OF RECORDS**

TRAD will also maintain registers of associated procedures, policy statements, templates and forms as part of the Management System, the documents of which will be regularly reviewed and revised to reflect best practice and a commitment to continual improvement and shall ensure that the significant environmental aspects are taken into account in establishing, implementing and maintaining our EMS achieved.

Of these procedures, Environmental Impacts Register (TRAD-PRO-056) is the most important as it establishes, implements and maintains a procedure to:

- Identify the environmental aspects of our activities, products and services within the defined scope of our EMS that we can control and those that it can influence taking into account planned or new developments, or new or modified activities and services; and
- Determine those aspects that have or can have significant impacts on the environment.

These documents will be kept on TRAD’s Computer Drive

Registers include:

- TRAD-Policies Signed;
- TRAD-Policy Statements;
- TRAD-Manuals
- TRAD- Procedures;
- TRAD- Procedures (Human Resources);
- TRAD- Forms;
- TRAD- RAMS (Risk Assessment, Method Statements);
- TRAD- COSHH Assessments
- TRAD - Current Laws, Regulations, Guidance Documents;
- TRAD- Templates.

The SHEQ Directors have been appointed to ensure that the EMS is established, implemented and maintained in accordance with the international standard.

The SHE Manager is responsible for the control and review of all documentation (with his SHE Advisor deputising for him in the event of illness or holidays), with Consultants Safety & Access giving advice where required.

The company shall establish, implement and maintain records as required to demonstrate conformity to the requirements of its EMS and the results achieved. For instance, the company shall keep records of all Risk Assessment/Method Statements (RAMS) and records of all environmental incidents and complaints, which are kept on the Confidential Safety Drive. This documented system maintains records for the identification, storage, protection, retrieval, retention and disposal of records, which will remain legible, identifiable and traceable until they are no longer required.
MONITORING AND MEASURING

The company shall establish, implement and document a procedure to monitor and measure on a regular basis the key characteristics of its operations that can have a significant impact on the environment, which will be documented. To ensure compliance, H&S Personnel will carry out audits of yard / sites and produce Audit Reports.

INTERNAL AUDITS

The arrangements, format and frequency of all environmental audits shall be documented in line with environmental audit procedures. Such audits will be carried out as necessary or when significant changes to one of the environmental acts, or significant changes to the company’s operations. Additionally, H&S Personnel will carry out full procedural audits of the company twice a year (January & July), with records retained, the schedule of which is documented in the minutes of the SHEQ meetings.

ENVIRONMENTAL PERFORMANCE

Environmental matters must be properly considered in all new developments and procedures, paying particular attention to the requirements of the relevant environmental laws.

Methods that have been established for monitoring and recording compliance with legal obligations in respect of routine liquid and gaseous effluent discharges and liquid and solid disposal should be detailed.

Methods used for elimination of waste at source or recycling or reuse of materials should be included, paying particular attention to the possibilities for materials substitution in processes.

CONSULTATION WITH EMPLOYEES AND WORKERS

The company will consult with employees and workers and their representatives through SLT meetings, toolbox talks and other methods where any changes to the operation present an impact on the environment.

All consultations will be recorded and any results or actions identified will be posted where applicable giving the information its widest circulation.
VALIDATION

The company will validate this environmental policy and related environmental management procedures by means of regular inspections and audits covering all aspects of environmental management.

Inspections will be carried out for:

- Regular housekeeping audits;
- Energy wastage;
- Waste product recycling;
- Introduction of new plant, installation or modifications;
- The disposal of waste products.
ENVIRONMENTAL INCIDENTS, NONCONFORMITIES, CORRECTIVE & PROTECTIVE ACTION

Investigation and reporting all abnormal occurrences with environmental implications should be recorded and investigated along with any complaints from 3rd parties, and all information saved to the confidential Safety Drive with the investigation carried out as detailed in TRAD Procedure: TRAD-PRO-008 - Accident, Incident Reporting & Investigation Procedure.

Investigations will be carried out by the SHE department with assistance from Safety & Access where required.

All environmental incident reports will be forwarded to the responsible Director for comment and raised at the following weekly Contracts Meeting (as well as the SHEQ meeting) with action points required and chased to completion.

All learnt lessons will be reviewed and significant lessons will be incorporated in the revised EMS (and will also be incorporated in the manual: TRAD-Man-002 Environmental Manual for 14001).

ARRANGEMENTS FOR REVIEWING AND UPDATING THE ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

The appointed Safety, Health, Environmental and Quality consultants are responsible for keeping the Company up to date with developments in environmental legislation, case law, and best practice and will supply the Company with a full list of legislation and best practice with which the Company will comply.

This Environmental Management System (incorporating the Environmental Policy) and associated procedures etc shall be reviewed, extended, revised in accordance with any significant changes identified above, and lessons learnt, and at least reviewed as a minimum every 12 months, to ensure that remains relevant to the business operations and is kept up to date.