



ISEC Interior Systems Ltd.

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ENVIRONMENTAL POLICY

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1. ENVIRONMENTAL POLICY STATEMENT

It is the policy of ISEC Interior Systems Ltd. (hereinafter referred to as “the Company”) that the Company will undertake its work, both at its main premises and on its construction sites, in accordance with environmental protection legislation and 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, and 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 and materials that can be used, recycled and/or disposed of without any residual damaging effect on the environment.

Ian Emmerson is the Director responsible for allocating resources and 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 and review of this policy, and for ensuring that the Company complies with environmental legislation and the objectives of this policy, through its selection of environmentally-friendly materials, the conduct of the Company’s employees and contracted personnel, and the procedures involved within its working methods.

If processes, activities and 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 and should always seek to reduce noise, fume, dust and waste emission levels. They must also make contingencies for any damage or incident that could release materials being used or worked on, and 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 and document the amounts of waste created on any site, endeavouring to reduce it to the minimum level, through prudent purchasing and re-cycling policies. Whatever waste is created that cannot be re-cycled, will be disposed of safely, in accordance with environmental legislation.

The Company requires all its employees and sub-contractors to take a pro-active 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 and 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



Position Managing Director

Date 01.01.2020

2. ENVIRONMENTAL IMPACT ASSESSMENT

The Company is a contractor involved in rendering, framing, plasterboard, partitioning, ceilings, passive fire protection and acoustic works. As such, the vast majority of its work, including the materials used, is specified by third parties. It does not manufacture or produce anything and so its environmental impact is created by (and limited to):

- The work of the office,
- Journeys made to and from site, including deliveries and the collection of waste generated by its activities,
- The work of its site installation operations,
- The products the Company installs (and associated packaging),
- Emissions of noise, dust and fumes from the installation operations,
- Accidents and spillages.

It should be noted, however, that whilst the Company has jurisdiction over the environmental impact of the products it selects, the Company cannot be held responsible for the environmental impact of products that are specified by its clients or other designers. Because of this, the Company's own control over its environmental impact risk assessment is quite low.

In addition, journeys made to site are dependent on the location of the work it wins from its competitors. Although deliveries and waste journeys will be locally sourced where practicable, these are often limited by the specialist nature of some of the electrical equipment it has specified by its clientele.

The site work carried out by the Company normally utilises low voltage or battery power, apart from lifting operations that usually require a fork truck (rough terrain) or mobile elevated work platform (MEWP) to put items into areas specified by others and to fix them in place.

All significant amounts of waste are created on site, and disposal is generally an operation undertaken in conjunction with the Principal Contractor. The Principal Contractor usually manages the disposal of materials from the site, using a suitably licensed waste carrier.

Products (and associated packaging) are primarily specified by others.

The Company uses materials in liquid or powder form, and so accidents and spillage risks are possible. However, because the amounts used are generally small, then the potential environmental impact of any such event is likely to be limited.

Other significant environmental risks can be created by dust emissions from site work, but generally these are of small quantities and of limited environmental significance.

Only in the offices is the Company in full control of the products it buys and working practices. The environmental impact in these areas is of very limited significance due to the low numbers of people working in the offices, and the small amount of materials and processes used that offer any opportunity of energy reduction or waste recycling.

3. KEY LEGISLATION

The following list is not complete, but cites the most important regulations affecting the Company:

- Environmental Protection Act 1990
- The Environmental Protection Duty of Care Act 1991
- The Waste Management Licensing (Amendment etc.) Regulations 1995
- Control of Substances Hazardous to Health Regulations 2002 (Amended)
- Waste Management (England and Wales) Regulations 2006
- Noise at Work Regulations 2006
- Waste Batteries and Accumulators Regulations 2009
- Buildings Regulations 2010
- The Waste Electrical and Electronic Equipment (Amended) Regulations 2010
- Wildlife and Countryside Act 1981 (Amended)

4. MONITORING AND CONTROL

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 operations, 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 local, and wider, environment is minimised.
- Minimise the use of hazardous substances and processes, by choosing less hazardous materials or processes wherever such alternatives are available.
- Reduce the level of noise created by their activities, and use "quiet" plant or equipment wherever possible.
- Reduce the level of dust and fume emissions created by their activities as much as possible, and ensure that protective equipment is available for users and screening is in place to contain the effects of these emissions.
- Ensure that the Company disposes of waste in a responsible manner within current legislation, and that proper recording processes are maintained.

5. 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 to work conducted at its office premises and also on-site operations.

Task designers and specifiers 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 liquids, dust, fumes or noise.

In the event of an accidental release of a hazardous substance, 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). COSHH risk assessments will give guidance on how hazardous substances can be safely recovered and removed in the event of an accidental release.

6. NOISE

Noise can be a risk, 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 around 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.

6.1 Action Levels

Noise is measured in decibels, weighted to the 'A' scale or referred to as dB(A), or in pascals, a unit of sound pressure or energy. For most work exposure, noise levels are 'averaged'. The averaged exposure is expressed in the term LEP,d (level of daily personal exposure). The action levels are:

- First Action Level 80dB(A) LEP,d
- Second Action Level 85dB(A) LEP,d

The Noise at Work Regulations 2005 require employers to:

- Carry out an assessment of the noise levels to which employees and third parties are exposed.
- Reduce noise, wherever practicable, to levels below the first action level of 80db(a) lep,d, by the selection of quieter work equipment or working methods.

Whenever possible, equipment creating the lowest practicable noise levels should be selected. Checks must be made on all work equipment to ensure that the level to which the operator is exposed is below 80dB(A) and the machine has been properly maintained. If this is the case, then no further action will normally be needed.

If the first action level of noise is exceeded then checks should be made to see if alternative, quieter machines are available or **Personal Protective Equipment** should be provided and used. This needs to be supplied to all persons put at risk from the noise. However, PPE does not normally protect those in the wider environment from the effects of noise pollution, and so priority should be given to removing the effects of noise from the surrounding environment by adequate noise attenuation measures, such as screening, bunding or using other sound attenuating equipment.

If persons are present in an area where the noise level is in excess of the first action level, then they must be provided with hearing protection. If the noise level is above the second action level, then they must be compelled to wear hearing protection or removed to a quieter area.

6.2 Small Items of Plant and Equipment

Small items of plant can be particularly noisy, but in general are only used for short periods of time. Whenever possible, quiet plant should always be selected. Small plant that generally exceeds levels of 85dB(A) include:

Type of Equipment	Typical Levels
Abrasive wheel/disc-cutting machines	Up to 100dB(A)
Hammer drills	Up to 100dB(A)
High-speed portable saws	90dB(A)
Generators	>90dB(A)
Bench saws	Up to 100dB(A)

Whenever the action level is exceeded, the task for which the equipment is required must be located away from persons who do not have hearing protection; otherwise all persons without hearing protection should be removed from the vicinity of the operation creating high noise levels.

This is especially important when working in an environment where employees are conducting other tasks, or members of the public are in the immediate vicinity.

6.3 Summary Check List for Reducing the Effects of Noise

- Select “quiet” plant and equipment whenever possible.
- Check operational noise levels from manufacturer’s or supplier’s data.
- If the equipment carries a warning sign, then hearing protection should be used by the operative and also supplied to those working in (or accessing) nearby areas.
- Check condition of doors, windows, acoustic covers etc. and ensure that they are closed.
- Remove non-essential personnel from the working area.
- Hearing protection should be used whenever abrasive disc machines and pneumatic breakers are used, irrespective of the exposure time. Other persons should be removed from the vicinity whenever these operations are conducted.

The Company’s Health and Safety Advisors will advise on hearing protection and will also carry out spot checks on the noise levels on site, if required.

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 (revised 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 listed in Part 1 of the approved supply list as dangerous for supply within the meaning of the Chemicals (Hazard Information and Packaging) Regulations - (see current edition of CHIP Regulations for latest list) and for which an indication of danger specified for the substance in Part V of that list is very toxic, toxic, harmful, corrosive or irritant.
- 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.
- A substance, not mentioned in the sub-paragraphs above, that creates a hazard to the health of any person, comparable with the hazards created by substances mentioned in those sub-paragraphs.

TYPICAL SYMBOLS DENOTING A COSHH SUBSTANCE



HARMFUL TO THE ENVIRONMENT



HEALTH HAZARD/
HAZARDOUS TO THE
OZONE LAYER



TOXIC



SERIOUS HEALTH
HAZARD



CORROSIVE

7.2 COSHH Inventory

Different substances may be encountered in different workplace locations and it is the responsibility of management to check the substances in use against the substances listed in the Company's product data manual, and to make any necessary additions.

7.3 COSHH Risk Assessments

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

- The quantities of the substance involved?
- The form in which the substance is supplied and/or used i.e. liquid, dust, solid, vapour.
- Its potential to do harm (this will depend to an extent on the potential routes of entry into the body) 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?

7.4 Control Measures

Under the COSHH Regulations, employers have to ensure that the exposure of employees or the environment to hazardous substances is prevented or, if this is not reasonably practicable, adequately controlled.

Exposure to hazardous substances can be controlled by:

- Removing the hazardous substance, by changing the process.
- Substituting with a safe or less hazardous substance.
- Ensuring that adequate waste disposal arrangements are made to contain the release of the hazardous substance.
- Enclosing the harmful process, to prevent emission of the substance or spillage into drainage systems.

7.5 Maintenance of Control Measures

All control measures in use should receive a visual check at least every week. Any local exhaust ventilation (LEV) plant should be thoroughly examined and tested by a competent person, every fourteen months. Any defects should be corrected. Records of visual checks, thorough examination tests and corrective action must be kept and be available for a period of at least 5 years following the inspection.

7.6 Information, Instruction and Training

Under the 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.

7.7 Site Manager's Action

The Site Manager's role is critical in compiling and dissipating information to sub-contractors and employees as detailed above, and COSHH assessment sheets should be referred to for the necessary information. The Site Manager must also act as co-ordinator for the COSHH aspects of the various substances used on site and, when applicable, liaise with the Principal Contractor.

The Site Manager should always seek to reduce the use and storage of harmful substances, wherever practicable.

7.8 Protection of the Public and Other Contractors

In addition to having a duty to protect the health of employees, COSHH Regulations place a duty on employers to safeguard other people and those in the immediate environment. In general, this will be achieved by the physical separation of other people from the work area.

Consideration should also be given to others when positioning exhausts from extraction equipment.

On many sites, employees from different contractors work in close proximity to each other, and to the public. In assessing the risks associated with the use of a substance, consideration must be given to ensure that:

- no-one is exposed to hazardous substances.
- the work that the different contractors are doing is compatible.
- spillage is prevented, and if any does occur, that it is cleaned up to prevent any damage to the environment, particularly from any hazardous substance entering local water courses.

If the Company is sub-contracted to another contractor, the other contractor will request copies of the Company's COSHH assessments, so that the risks to other contractors and the site-wide environment may be evaluated.

7.9 Sub-Contractors to ISEC Interior Systems Limited

If another contractor is contracted to carry out work on site, they must submit a list of the hazardous substances to be used on the site, to the Safety Director, with copies of their assessment sheets clearly showing:

- The hazards and risks associated with the substance and its use.
- The precautions that must be taken to protect all site employees and members of the public.
- The precautions that they will take to prevent any spillage of hazardous substances and how they will clean up any such spillage, to prevent any discharge into local water courses.

The Health and Safety Director should check and file this information with the COSHH manual, and ensure that copies are taken to contract sites.

8. RECOVERY OF WASTE ELECTRICAL EQUIPMENT

The Waste Electrical and Electronic Equipment (WEEE) Regulations 2006, implement the main provisions of the European Parliament and Council Directive on waste electrical and electronic equipment (as amended). The WEEE Directive implements the principle of “extended producer responsibility”, making producers take financial responsibility for the environmental impact of products they place on the market, especially when those products become waste. The WEEE Directive applied this principle in relation to electrical and electronic equipment (EEE).

The WEE Regulations place financial obligations on producers in terms of the collection, treatment, recovery and the environmentally sound disposal of WEEE. This includes EEE that is used for official, professional, commercial or business purposes. Any EEE sold for non-household use must also be treated and recycled in an environmentally sound manner when discarded as WEEE.

A producer selling EEE for non-household use is by default obliged to finance the collection, treatment and recovery and environmentally sound disposal of:

- Any WEEE replaced (of equivalent type or similar functionality) by the EEE put on the market if it was originally purchased before **13 August 2005**, whether supplied by him or another producer
and
- The EEE put on the market on or after **13 August 2005** when it is eventually discarded as WEEE during a compliance period.

The collection, treatment, recovery and environmentally sound disposal may be undertaken either by the producer himself or his Producer Compliance Scheme.

Producers and users of non-household EEE are expected to adopt a reasonable and practical approach when they undertake like-for-like transactions.

The implications of these regulations may affect the Company in a limited way, through its suppliers and contractors involved in its office lighting, power and equipment.

9. WASTE MANAGEMENT

The Company will plan and manage the quantities of waste produced, specifying the types of waste expected on each project and the planned means of disposal.

The objective of such a plan is to assess the amounts of waste created during a contract, reducing it to the minimum level wherever practicable, through the Company's purchasing and re-cycling policies. Whatever waste is created that cannot be re-cycled will be disposed of safely in accordance with environmental legislation.

Where the Company works for a Principal Contractor, it will provide suitable data on both its planned waste and the actual waste disposed of through the contract, to the Principal Contractor.

The Company, through its own working practices, and those of its subcontractors, will strive to minimise amounts of waste and, where waste is created, will endeavour to re-use it elsewhere, or otherwise recycle it.

10. PLANNING SITE ACTIVITY

When planning site welfare and office establishment and work tasks, it is important that all environmental issues are taken into account, not only on and adjacent to the site, but also in the locality and on public thoroughfares.

Fires should never be allowed on any site due to the risks of fire spreading to neighbouring areas and smoke drifting across roads to obscure driver's views and also onto adjacent property, creating dusts, nuisance and respiratory risks to neighbours.

Key elements that need to be risk assessed are:

- Proximity of neighbouring working areas
- Proximity of neighbouring properties
- Location of public roads and footpaths
- Location of watercourses and drains
- Risks to wildlife

10.1 Neighbouring Properties and Land Use

It is important to ensure that the activities of the site do not have an unnecessarily severe impact on neighbouring properties. If the property is domestic, then issues that must be controlled are:

a) Working Hours

Site working hours must be contained to reduce the impact of the site (particularly noise) on residents.

b) Vehicles

Reducing the impact of traffic on approach roads and ensuring that third party access is not blocked by waiting traffic, or site vehicles parked in an inconsiderate manner.

If there are schools or nurseries in the vicinity, then delivery and collection traffic must be instructed to avoid peak pick-up and drop-off times that otherwise would create risks to parents and young persons.

c) Noise

Ensuring that, wherever possible, noisy operations are conducted well within site boundaries, and - in residential areas - not early in the morning or late at night. Neighbouring properties should never be exposed to noise levels above the threshold action levels. Music systems etc. should not be allowed in any area where they can be heard in adjoining premises.

d) Dust and Dirt

Dust must be contained within the confines of the site and preferably always controlled at source, with suppression equipment on the tools.

e) Vibration

High vibration levels, as well as being a nuisance to neighbours, can (in the extreme) destabilise structures and pose risks of falling objects and structural collapse. In industrial premises, even moderate vibration levels can seriously affect certain production and research processes in neighbouring units. It is vital to assess vibration risks, especially when undergoing operations such as piling, to ensure that the impact on neighbouring properties is minimal.

10.2 Location of Public Roads and Footpaths

a) Vehicles

Reducing the impact of site traffic on third parties must be a priority. Containing activities that require waiting, parking, turning and manoeuvring (wherever feasible) to areas within the site area should be a priority. Site traffic should not park on pavements or across drop-curve crossing points, as it will restrict pedestrian access.

b) Dust and Dirt

Dust must be contained within the confines of the working area, and preferably always controlled at source, with suppression equipment on the tools.

If the site leads immediately onto a shared access road, it may be necessary to control the amount of mud and debris from emerging traffic by employing a wheel-washing system and a road sweeper, to remove dirt and mud from the approach roads, where it may pose a slip risk, in addition to being an environmental nuisance.

10.3 Location of Watercourses and Drains

Existing watercourses and drains (sometimes running sub-surface through a site) can take materials from site into the wider aquatic/marine environment and create substantial environmental damage to plants and animals. Key issues are:

a) Dust and Dirt

Materials, dust and dirt must be contained in areas where there is no risk of it entering watercourses. Locating storage facilities for powdered materials, such as cement, away from drains and watercourses, and ensuring that activities creating dust and dirt take place away from drains and watercourses, should be priority considerations.

b) Spillages

It is important to ensure that liquid materials and spillages do not flow into drains and watercourses.

Fuel and liquid material stores must be located where any spillages can be contained, or else bunded protection should be provided, as a precaution against liquid spills.

Where water is employed in the work processes, it is important that waste water does not carry hazardous substances into drains and ditches to pollute drains and watercourses. Such processes should be carried out where the waste can be minimised and captured to prevent this from happening.

10.4 Wildlife

Site activity must, as far as practicable, conserve the natural environment and ensure the protection of any prescribed endangered species of plants and animals. Not only can protected species be threatened on the site by site work, but the effects can resonate well beyond the site boundaries. For example, activities can create pollution that flows into drains, killing aquatic species, while general noise, dust and vibration can threaten breeding patterns, especially of nearby nesting birds.

The scope of site activity is controlled by various regulations affecting nesting birds and other breeding wildlife and also legislation requiring the protection of endangered species.

Before starting work on any site, it is important to appraise the risks of site activities on wildlife, both on the site itself and, in the event of any concerns, specialist environmental advice should be sought.

11. WASTE DISPOSAL AND ENVIRONMENTAL PROTECTION

It is Company policy that waste will be controlled through prudent purchasing policies and the management of materials on site to ensure that, wherever practicable, waste can be re-cycled for use on the site on which it was created, or failing this, on another site.

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.

11.1 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.

11.2 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 - The party that arranges the transfer of waste but does not control finally what happens to it.

Waste Carrier - A party that transports waste. The company will maintain registration with a waste regulation authority and have a licence to confirm this registration.

11.3 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.

11.4 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.

11.5 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.

11.6 Duty Holders

All duty holders should look out for breaches of the duty committed by others in the chain. Breaches of the duty should be reported to the Waste Regulation Authority and further dealings with the offenders should be reconsidered.

Duty holders are only expected to do what is “reasonable in the circumstances”. The extent to which they should check up on others in the chain depends on the nature of the waste, how it is to be dealt with and what the holder might “reasonably be expected to know or foresee”. It is, for example, more important to check up on a consignment of toxic chemical waste than a load of waste paper.

11.7 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.

11.8 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.

12. INCIDENT REPORTING AND HANDLING COMPLAINTS

The Company has a general procedure and arrangements for the reporting of serious incidents including releases of the types of hazardous substances that constitute a “dangerous occurrence” under RIDDOR. These arrangements and procedures are detailed in the Company’s Health and Safety Policy.

Whenever it is suspected that an accidental release of a hazardous substance has occurred that is likely to have a polluting affect on the environment, both the 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.

The Company has a general complaints procedure that includes health, safety and environmental complaints, and will investigate any valid complaint to prevent recurrence.

Complaints regarding reported spillages or environmental emissions of noise or dust must be notified to the Director Responsible for Environmental Issues.



Managing Director

January 2020