

ENVIRONMENTAL POLICY

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**Liam Chivers
Managing Director**

1.0 INTRODUCTION

Initial Systems Ltd is an employer whose scope of work revolves around providing the following services within the Construction Industry:-

- Surfacing
- Civils Works
- Drainage Works
- Platform Refurbishments and Extension
- Section 278 Works and 108 Works
- Regeneration Works

and the Company Director recognises that he has legal and social responsibilities to protect the environment from unnecessary harmful effects.

With the development of this document the Company Director is making a public statement of his intent to control the impact that the workplace activities have on the natural environment. The company will commit to continuous improvement in its environmental performance.

Through this policy document, the Company Director's commitment and staff support, Initial Systems Ltd will endeavor to contribute towards the Government's commitment to protecting the environment for future generations to come.

2.0 ENVIRONMENTAL GENERAL POLICY STATEMENT

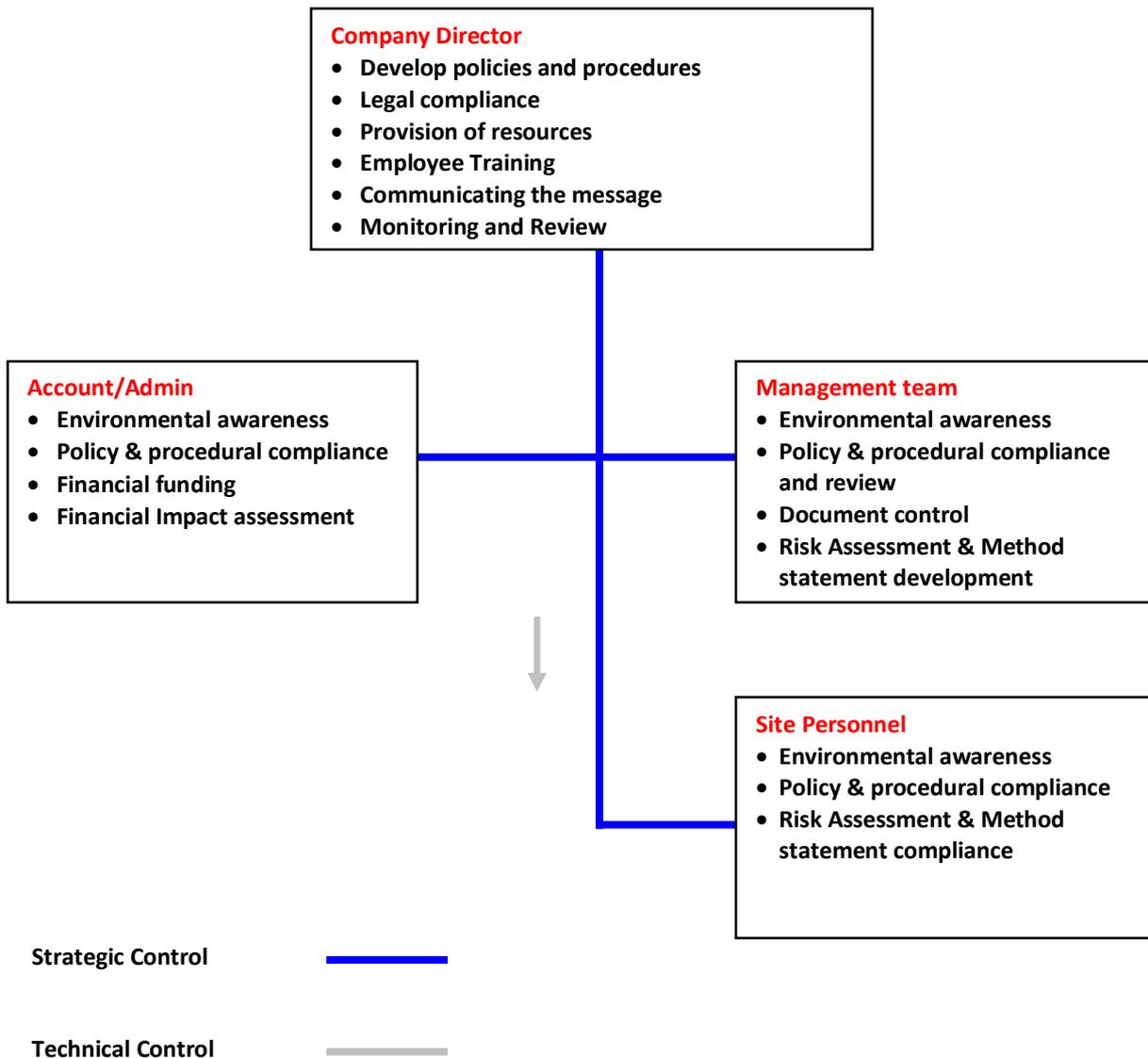
Initial Systems Ltd recognise the importance of environmental protection and is committed to operating its business responsibly and in compliance with all legal requirements relating to the provision of services to the building and construction industry. It is Initial Systems Ltd declared policy to operate with and to maintain good relations with all regulatory bodies and client undertakings.

It is Initial Systems Ltd objective to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through the implementation of the following:

- ◆ Assess and regularly re-assess the environmental effects of Initial Systems Ltd activities
- ◆ Training of employees in environmental issues
- ◆ Minimise the production of waste
- ◆ Minimise material wastage
- ◆ Minimise energy wastage
- ◆ Promote the use of recyclable and renewable materials
- ◆ Reduce and/or limit the production of pollutants to water, land and air
- ◆ Control noise emissions from operations
- ◆ Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation

This policy is communicated to all employees, suppliers and sub-contractors and is made available to the public.

3.0 COMPANY ORGANISATION FOR ENVIRONMENTAL MANAGEMENT



4.0 ARRANGEMENTS FOR ENVIRONMENTAL MANGEMENT

4.1 ORGANISATION, IMPLEMENTATION AND MAINTENANCE

Initial Systems Ltd will initiate its Environmental Management procedures through a process of environmental impact evaluation. This process will be undertaken by those assigned managerial responsibility within the organisation. It will be their responsibility to identify the significance of our activities on the environment and where we have control of the nature and potential severity of the impact implement the appropriate controls.

All new work processes undertaken or materials purchased/obtained whether related to a new contract or not will be similarly reviewed. Managers will include the findings of the environmental impact evaluation into company risk assessments and method statements.

Items included in this and subsequent environmental impact evaluations will include, but are not limited to:

- ◆ Legal requirements
- ◆ Discharges to air, land and water

- ◆ Potential COSHH and Health and Safety aspects of the materials used
- ◆ Waste management
- ◆ **Working practices**
- ◆ Use of resources
- ◆ Suppliers' and sub-contractors' environmental commitments & activities
- ◆ Environmental Risk Assessments

4.2 ENVIRONMENTAL REVIEW

Initial Systems Ltd is aware that an important part of its commitment to environmental preservation is reviewing the company's success or otherwise in implementing the policy and underpinning procedures.

Part of the review process will be looking at existing and new/pending legislation and how such legislation will be integrated into our systems. It will be the responsibility of the director and managers to discuss this at periodic meetings the relevance of legislation on the company's activities.

To assist in keeping abreast of environmental legislation, the company will use the services of its external health and safety advisor SafetyCO UK to guide and direct the company. This arrangement will be supplemented by the organisation using the Internet to visit the environmental agency website from time to time to look at government strategies for environmental sustainability.

4.3 ENVIRONMENTAL OBJECTIVES AND TARGETS

As part of the management review process detailed under section 4.11, objectives and targets are set in order to mitigate any adverse environmental impacts of the organisation activities.

The company will develop a simple environmental program identifying those activities with significant aspects to be included in the current program and by a process of regular review, prioritised by the company director, according to our ability to reasonably control or influence environmental improvement.

Following every review of environmental impacts any appropriate amendments are made to the current Environmental Programme.

In setting Initial Systems Ltd objectives and targets the following considerations are taken into account:

- ◆ The Organisation's legal and other similar requirements
- ◆ The Organisation's significant environmental impacts
- ◆ The Organisation's technological options
- ◆ The Organisation's financial options
- ◆ The Organisation's operational options
- ◆ The Organisation's business requirements
- ◆ The views of external interested parties (e.g. clients, enforcing agencies etc)
- ◆ Internal feedback

For every objective and target set, a program for its achievement will be defined. Risk Assessments will be prepared for all activities included in the current Environmental Programme.

These Risk Assessments form part of the record kept as evidence of the operation and effectiveness of the Environmental Management procedures.

Objectives, targets and Method Statements are reviewed as part of Management Reviews in order to ensure that the information is kept up to date.

Objectives, targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy Statement including its commitment to:

- ◆ Prevent pollution
- ◆ Control resource usage
- ◆ Support environmental protection
- ◆ Achieve continual improvement

4.4 COMPETENCE AND TRAINING

Initial Systems Ltd as part of its management review will identify relevant environmental training needs and develop training programs to meet the needs of the organisation. To assist in the development of training programs, the company's risk assessments will be reviewed on a regular basis (at least annually). The company's training, will has necessary and appropriately take the form of:

- ◆ Company induction training
- ◆ Informal work training
- ◆ Formal training and site specific tool box talk training
- ◆ Customer/client instructions
- ◆ Supplier and Sub-contractor training

Whenever a member of staff is responsible for an activity identified in a risk assessment as having a significant environmental impact, additional training is provided in order to ensure that the individual has the necessary skills to deal with the issue. A record of this training will be maintained as part of the individual's training record.

As a minimum, environment specific training includes, but will not be limited to:

- ◆ The importance of conformance with the company's environmental policy
- ◆ The importance of conformance with the company's environmental procedures
- ◆ The significant environmental impacts related to the individual's work activities
- ◆ Roles and responsibilities in achieving conformance with the company's environmental policy and the environmental procedures
- ◆ Potential environmental consequences of departure from the environmental procedures

Records of all environmental training will be kept on file via personal records.

4.5 COMMUNICATION

Whenever communications relating to an environmental issue are received from an external interested party, it is passed to the company director in the first instance. Other members of management may be required to provide input into investigating and responding to the issue.

External interested parties may include the following:

- ◆ Suppliers and sub-contractors
- ◆ Customers
- ◆ Regulatory bodies
- ◆ Enforcement agencies
- ◆ The general public

The details of all external communications of an environmental nature are noted for future reference in the office correspondence diary.

The company's response to external communications may be verbal or in writing dependant on the nature and urgency of the issue. In all instances, the outcome of the consideration of the communication and response will be noted by the company director in the office correspondence diary.

4.6 DOCUMENTATION CONTROL

The company's environmental management procedures are defined in the following documents:

- ◆ Environmental Policy Organisational Chart
- ◆ Environmental Policy Statement
- ◆ Company Risk Assessments
- ◆ Company Method Statements
- ◆ COSHH Assessments
- ◆ Product and Chemical Data Sheets
- ◆ Work Instructions and Procedure Manuals
- ◆ Company Health & Safety management procedures
- ◆ Site Waste Management Plans
- ◆ Tool Box Talk documents

These documents may be held as hard copy or in electronic format.

Initial Systems Ltd company director has approved this environmental policy document and the associated documents referred to above. The company director shall approve all subsequent issues and amendments to company procedures.

The only controlled copies of the environmental policy document and associated information are those held on Initial Systems Ltd computer system or those issued by the company director and bear his signature. All other hard copies and any other electronic copies are by definition uncontrolled.

Proposed changes to the environmental policy document and associated documents are identified during the day to day work activities as well as more formally during the management review process described in Section 4.11.

Proposed changes are reviewed and, if appropriate, adopted by the company director after taking into account all of the relevant information and consultation with our external consultants.

When adopted, changes are made to the controlled copy of the environmental policy document and any associated documents. The appropriate personnel are notified of the change(s).

The integrity of the computer system and the data held on it is maintained by running background virus protection software. Initial Systems Ltd ensures that the organisation's computer system is regularly backed-up with a copy securely stored.

The company will as necessary keep the following documents related to environmental issues for at least two years.

- ◆ Management Review records
- ◆ Communications of an environmental nature from, and responses to, external interested parties
- ◆ Site Waste Management Plans
- ◆ Monitoring and measurement records
- ◆ Audit records
- ◆ Risk Assessments (with specific environmental impact)
- ◆ Calibration records
- ◆ Environmental correspondence records
- ◆ COSHH Assessments (with specific environmental impact)
- ◆ Staff training records

Initial Systems Ltd storage system, both in electronic and hard copy, ensures that all environmental records and similar documents are adequately protected; remain legible and identifiable for future retrieval.

4.7 MANAGEMENT TEAM CONTROL

Operational control is maintained by the use of procedures set out in:

- ◆ This Environmental Policy Document
- ◆ Risk Assessments and Method Statements
- ◆ The schedule of current relevant environmental legislation and regulations
- ◆ Training and toolbox programs
- ◆ COSHH Assessments
- ◆ The organisation's Health & Safety Management procedures

As part of initial induction and on-going training, staff is made aware that they are responsible for reporting environmental observations and suggestions to the company director.

Whenever it is considered relevant to the goods or services required, a copy of the Initial Systems Ltd Environmental Policy is issued to all suppliers and sub-contractors. In addition, when appropriate, suppliers and sub-contractors are made aware of the Organisation's position relating to the environment, in particular with regard to:

- ◆ Prevention and/or mitigation of all forms of pollution
- ◆ Recycling of materials
- ◆ Waste management
- ◆ Materials sourced from sustainable and/or renewable resources
- ◆ Support for environmental protection

Through the company's managers, surveyors and estimators any incoming and specified materials are reviewed to identify any special COSHH requirements. Any queries are referred to the supplier/manufacturer.

Suppliers and sub-contractors are subject to a review of their environmental performance as part of the approval process before being appointed as approved suppliers.

4.8 EMERGENCY ARRANGEMENTS

The potential for, and response to, potential accidents and emergency situations are identified during the preparation of work specific activities and management reviews. Prior to or at the start of every contract, company surveyors and other managers also identify any additional contract specific potential accident and/or emergency situations.

Whenever the potential for accidents and emergency situations is identified, the risk assessment conducted by project managers is then defined in the method statement on how to prevent or mitigate any adverse environmental impact of the occurrence.

As far as is practicable accident and emergency response procedures will be periodically tested in order to ensure that the required prevention or mitigation of any adverse environmental impact is achieved. A record of the testing will be maintained.

The company's existing procedures are reviewed and revised following any unexpected incident having a significant environmental impact.

4.9 MONITORING AND MEASURING PERFORMANCE

Objectives and targets are established as a result of risk assessment activities and management reviews. Whenever quantifiable targets are identified and agreed, the means of monitoring and measuring their achievement will be included in method statements.

Responsibility for monitoring the level of achievement in reaching the identified targets is assigned to members of the company's management team. The risk assessment and method statement documents relating to the activity will be marked with the name/job title of the person(s) responsible.

Whenever monitoring activities identify significant deviation from the objectives and targets defined in the risk assessments and method statement, a Management Information Report is raised and used to record and control the occurrence.

Initial Systems Ltd management review activities include a review of compliance with the relevant risk assessment monitoring records

The company director ensures that a regular review is conducted of the Organisation's compliance with its legal requirements and appropriate records are maintained.

Management Review activities include a review of all significant findings identified during such compliance reviews.

4.10 AUDIT

Initial Systems Ltd are aware that auditing all its systems including environmental procedures is an important part of ensuring that objectives and targets have been met and continue to be relevant. The results of all Environmental Audits are passed to the company director.

The company director will ensure that every section of the Environmental policy document and procedures are analysed at least annually. More frequent audits may be organised by the company director depending on the importance of the activities being audited.

Our external consultants, who will refer to this procedural document and determine the activities to be audited, will undertake the audit. In conducting the audit, they will select a representative number of records to be audited on a random basis. The auditor advises any personnel concerned that an Environmental Audit is being undertaken and answers any questions they may have regarding the audit.

The auditor examines the records selected in order to determine whether the activities identified above have been carried out correctly.

Objectives, targets and Method Statements are checked in order to confirm that they are consistent with the Organisation's Environmental Policy Statement including its commitment to:

- ◆ Prevent pollution
- ◆ Control resource usage
- ◆ Support environmental protection
- ◆ Achieve continual improvement

The Environmental Audit record and all other documents relating to external audits are passed to the company director.

All issues arising from the external environmental audit requiring immediate attention are discussed with the appropriate personnel and a record kept. The company director ensures that the environmental audit results are discussed at the next management review.

4.11 MANAGEMENT REVIEW

An environmental management review is carried out at not greater than six monthly intervals. If appropriate, a corrective and preventive action plan is formulated.

Environmental management review meetings may be held as a component of other Management system reviews (e.g. project management meetings or health and safety meetings).

Specific items included on the agenda of management review are:

- ◆ The continuing relevance of the Environmental Programme
- ◆ Changing environmental aspects and impacts of the Organisation's activities
- ◆ Internal feed back
- ◆ Results of the monitoring and measurement of achievement of environmental objectives, targets and programmes
- ◆ Communications relating to environmental issues received from external interested parties
- ◆ Changing Government Policy and National, EU and International environmental legislation, regulation and directives
- ◆ The availability of new technology
- ◆ The effectiveness of corrective and preventive actions
- ◆ Environmental Audit findings

Records of the findings of the management review and any planned action are kept for a minimum period of two years as part of the organisation's environmental record system. Records made available at management reviews include:

- ◆ Record of previous Management Reviews
- ◆ Communications from external interested parties
- ◆ Monitoring and measurement records
- ◆ Corrective and preventive action records
- ◆ Environmental Audit records

A record is kept of the proceedings of the management review and the record and/or appropriate extracts thereof are circulated to all appropriate members of the organisation.

5.0 USEFUL CONTACT NUMBERS AND ASSOCIATION

Health and Safety Executive

Rose Court
2 Southwark Bridge
London SE1 9HS
Tel: 020 7556 2100
Fax: 020 7556 2200

Environment Agency

Millbank Tower
25th floor
21-24 Millbank
London SW1P 4XL
Tel: 020 7863 8600
Fax: 020 7863 8650

HSE Books

PO Box 1999
Sudbury
Suffolk CO10 6FS
Tel: 01787 881165
Fax: 01787 313995
Website: www.open.gov.uk/hse/publicat.htm

Construction Industry Training Board

(CITB) South East Area Office
Walker House
London Road
Riverhead
Sevenoaks
Kent TN13 2DN
Tel: 01732 467300
Fax: 01732 460561
Website: [/www.citb.org.uk](http://www.citb.org.uk)

Incident Contact Centre (for reporting RIDDOR Accidents/Incidents)

Caerphilly Business Park
Caerphilly
CF83 3GG
Tel: 0845 300 9923
Fax: 0845 300 9924 (Website: www.riddor.gov.uk)
email: riddor@natbrit.com

Envirowise

Advice Line on 0800 585 794.
Website: www.envirowise.gov.uk