ENVIRONMENTAL

MANUAL

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1. ENVIRONMENTAL RISK ASSESSMENTS

Just as the Management of Health & Safety at Work Regulations 1999 require an employer to identify hazards and introduce control measures to reduce risk to the health, safety and welfare of his employees from the hazards they are exposed to at work, (and to persons not in his employment arising out of or in connection with his undertaking), the environmental Protection Act effectively requires a similar procedure to protect the environment.

MLP will therefore follow a similar procedure, in relation to the environment, to that used to assess risks to the H&S of persons. Assessments will be reviewed annually and/or when there is any significant change in the relevant regulations, the environment in which the work activity is carried out, or the activity itself.

MLP has therefore carried out assessments of risk to the environment and the standard terminology for H&S Risk Factors **(MLP-HSP-019 Risk assessment procedure, Appendix A)** has been modified to enable the H&S system to be used for environmental topics.

Managers have been tasked with carrying out assessment of risk to the environment and are considered to be competent to do so by virtue of their training, experience, knowledge and other qualities in their specialised area.

The most important part of any risk assessment is that the employer considers the recommendations, decides on a course of action and initiates appropriate action without undue delay. A reassessment of the remaining risk may then be necessary.

In any project, MLP will consider:

- The environmental impact of the project: This will take into account the existing and proposed future habitat, felling/planting of trees, water table and water courses, and the past/present/future usage of the area.
- Possibility of pollution accidents: To cover the permitted, planned or consequential discharges to a water course.
- Working practices: including the disposal of waste to landfill.

- Incidental exposure: including controls on the use of chemicals and to limit the general exposure of the environment to dangerous chemicals.

All the above aspects are to be considered then, where possible, methods and designs will be adopted that will, so far as is reasonably practicable, enhance the environment. The methods and designs will also take into account HS&E issues including management during the duration of the project (for employees and others) and at the conclusion of the project (for the client and others).

2. DEALING WITH ENVIRONMENTAL HAZARDS

The potential for MLP to adversely affect the environment will vary with the nature of the site and project but will include:

- Inappropriate disposal of waste.
- Pollution in water courses and/or the water course.
- Illegal destruction of hazardous waste,
- Protected species (including plants, trees, butterflies, moths, toads, insects, animals and fish).

MLP will assess the risk to and from the environment taking advice, where appropriate, from local authorities, environmental agencies and clients. Similarly, MLP will offer advice to clients if the work plan is not environmentally friendly.

3. ENVIRONMENTAL INCIDENT REPORTING

The definition of an accident remains much the same in that it is still an “unplanned event” but now it is the environment which is at risk. Deliberate and/or careless action resulting in environmental damage, such as pouring waste oil down a drain, is not defined as an accident but as a criminal act.

The majority of accidents are preventable and most are caused by human error. Where equipment failure is involved, then such failure is invariably attributable to human failure.

Again the best and pro-active way to prevent environmental accidents is to eliminate or reduce risk by identifying hazards, assessing the risk from that hazard, and taking appropriate action.

While accidents are to be avoided we must benefit from those that actually occur so such events must be investigated and appropriate measures taken to prevent a reoccurrence. Similarly an incident which is a near miss today may result in environmental disaster tomorrow.

In some circumstances it is also a legal requirement to notify the relevant authority in the event of an accident. In the event of contamination of a water course then it is the National Rivers Authority that must be notified. Such notification must be by the fastest available means (i.e. telephone) as soon after the incident as possible and normally on the day/within minutes of the accident occurring. Similarly the client and the employer must also be informed.

4. ENVIRONMENTAL INCIDENT REPORTING PROCEDURES

Incident categories:

- **Category 1**

Any event in which **significant environmental damage** has occurred and / or there is **risk of prosecution.**

- **Category 2**

An event in which a polluting material has been released but no significant environmental damage has been caused.

- **Category 3**

An event where polluting material has been discovered or damage to the environment has been caused by the activities of a THIRD PARTY, not contracted by MLP.

- **Near Miss**

Any event which has the potential to become an environmental incident.

Reporting:

All Near Misses, however minor should be reported to the HSEQ Manager by means of the NMR books (**ML73**).

Any incident in Category 1, 2 or 3 should be **immediately** reported to the HSEQ Manager by means of the incident reporting form **ML83**.

The HSEQ Manager is to coordinate any remediation actions and to liaise with the relevant authorities.

The HSEQ Manager is to carry out a full investigation and report to the Directors at the earliest opportunity. All employees and involved persons are to cooperate with any investigation.

The investigation report is 'Privileged Information' and must not be released to any person without the express permission of the company Directors and insurers or legal advisors.

The HSEQ Manager maintains a record of all Incidents for statistical analysis and reporting to management meetings and clients.

The types of event are:

- Emissions to air (noise, odour, dust)
- Discharges to water
- Contamination of land
- Waste management
- Damage to flora, fauna and habitat
- Waste of raw materials

The types of incident are:

- Damage to Trees (inc roots) vegetation or habitat
- All spills of any hazardous material or substance
- All petroleum, diesel, oil or lubricant spillages
- All unplanned fires in relation to construction activities
- Air pollution where release of toxic material, dust or smoke may cause a public nuisance
- Illegal or improper dumping or storage of waste material for disposal
- Discharges to watercourses, drains or sewers of deleterious substances
- Blockage of any watercourse
- Landslides, erosion or flooding
- Violation of any environmental legislation or permit.

5. PROCUREMENT

The best way to ensure that employees use only safe materials and equipment is to take action at the procurement stage. Clearly the price of individual products will have a bearing on procurement but, on occasions, the product with the lowest purchase price will not be the cheapest in use. Running costs, ergo fuel etc, should also be considered. The final item in the equation is that the cheapest item may not be the best from the H&S and/or environmental viewpoint in that it is potentially more expensive and environmentally damaging in the long term.

MLP will judge products against similar products not just as a matter of price but also potential H&S problems and the effect on the environment.

Another aspect of procurement is the need to reduce the amount of waste which can arise from packaging and waste disposal is expensive apart from the environmental impact. Every effort will therefore be made to obtain products with recyclable packaging or the minimum of packaging that will protect and contain the product.

Those responsible for placing orders shall, so far as is reasonably practicable, purchase supplies from ethical sources

6. USE OF HAZARDOUS SUBSTANCES

Substances can be hazardous to habitat, flora and fauna just as they can be to human beings. A pint of oil poured into a lake could cover approximately an ‘acre’ preventing oxygenation. Indeed, even more so as humans can protect themselves from known hazards. It is therefore essential that any herbicides and pesticides etc used on the premises are selected that will not damage the environment and will only do the job required of them.

Manufacturer’s safety data sheets and sales publications will offer advice on the safe use of chemicals, not just in relation to people, but also for the environment. There is no point in selecting substances that will not kill flora and fauna if it kills off the habitat on which they depend.

Where it is possible to use organic substances instead of a chemical then this should be considered first. Only if such a substance is not available or viable should a chemical be considered.

Particular care must be taken where a protected species is identified as being at risk from proposed MLP activities. Should this situation occur then the appropriate department and the client must be consulted before any work commences.

Chemicals may be applied either by machine or by hand depending on the circumstances. Protection for those involved is dealt with in the **MLP-HSP-008 COSHH Procedure**, under the need for COSHH assessments. Consideration of the potential effect on others is also important and a legal requirement. This topic will not be repeated here.

When carrying out any kind of work in the open air then environmental conditions must be taken into account. The effect of weather conditions can be quite significant. Similarly the presence of water courses must be considered.

Only properly trained and authorised persons may use hazardous substances and first aid requirements must be immediately available to use in the event of an accident. Similarly, those items of emergency equipment identified by an assessment as necessary to cope with a spill must also be available. Decanting must only be carried out in a suitable location and no empty drums are to be left on site.

7. WASTE DISPOSAL

The disposal of waste is a real waste of money and other resources. The less waste that must be disposed of then the less the cost of disposal.

Some waste is biodegradable, especially green waste, but most waste disposal companies simply take their skips to a land fill site. While perfectly legal, land fill is very poor from an environmental point of view. Other waste is burned commercially recovering energy (heat) but still generating pollution (smoke).

Ideally waste would be kept to a minimum, partly to avoid having to pay good money to dispose of rubbish, but it also means that perhaps less trees would need to be cut down to make paper, and less land is required for land fill.

Where the production of waste is unavoidable then recycling is the most environmentally friendly option. For example, turning grass cuttings into compost, re-using cardboard boxes and other packaging, sending empty cans and bottles to a recycling depot, even selling debris as hard core for building material or a soak away. Disposal by burning is not an option.

Again the selection of basic materials at the procurement stage could ensure that as much packaging as possible can be re-used. The producers/suppliers also have an obligation and even a legal duty to design and use packaging that will result in as little waste as possible.

Where waste must be disposed of through a waste disposal company then a competent and licensed company will be selected. In addition, MLP will discharge its duty to ensure waste is disposed of properly (no fly tipping) by following selected but random vehicles to the final waste disposal destination. So far as is reasonably possible, different types of waste materials will be sorted to make it easier to recycle.

Hazardous waste will be segregated from all other types of waste and disposed of through a competent and licensed hazardous waste disposal contractor.

The Workshop Manager will have a special responsibility for dealing with waste arisings and a target to reduce to landfill the total quantity by 10% year on year. To facilitate this up to date records of waste are to be collated by the HSEQ Manager.

Basic procedures for the control of waste are as follows:

- Prevent waste escaping from the site, prevent it from harming anyone and anything, and store it safely and securely.
- Check that any waste disposal contractor you select has the competence and authority to take the waste away and dispose of it properly.
- Ensure the documentation/transfer note is correctly filled in and write the description of the waste on the transfer note (to conserve paper).
- Pass the waste transfer note to the HSEQ Manager.
- For repeated transfers of the same kind of waste between the same parties one transfer note may be used usually running from April to March.

8. CONTAMINATED LAND – POLLUTION

Soil contamination from previous perhaps industrial use is a big issue in some areas. The main problem for those working on the land is the nature of the contamination, i.e. is it hazardous to those working on it or to the environment. However, the biggest problem is the sheer cost of de-contaminating the ground.

The costs will include:-

- Identification of the pollutant/s.
- Extent/area of the pollution.
- Cost of taking up the contaminated soil.
- Protection of those taking part.
- Cost of disposing of the contaminated waste.
- Location and procurement of suitable replacement soil.
- Spreading and contouring the replacement soil.
- Replanting.
- Health monitoring.

The overall cost of such an enterprise would mean that a very high price would need to be quoted. For this reason great care must be taken when dealing with land that has a previous industrial or military history.

MLP operators will from time to time work on projects involving contaminated land. It is essential that the nature of the contamination is known, appropriate arrangements made for the protection of the workforce, and that the plant and other equipment is cleaned before recovery from the site.

At Mill Pond Farm the greatest risk of pollution arises from oil spills and during refuelling. There is also the potential for a fuel tank to leak/burst resulting in significant pollution. All tanks containing vehicle, plant or heating oil must be bunded with non-porous bunds so as to accept 110% of the contents of the largest tank served by the bund.

9. THE BUSINESS CHARTER FOR SUSTAINABLE DEVELOPMENT.

INTRODUCTION This charter was developed by the International Chamber of Commerce and is included as a bench mark for standards which the company aim to achieve in the long term. While there are elements of the charter that are not relevant to MLP the general thrust of the aims is relevant. MLP will therefore seek to contribute at company level to the national and global aims of the charter. The Charter is given here in its original form as issued by the Chamber.

CORPORATE PRIORITY To recognise environmental management as among the highest corporate priorities and as a key determinant to sustainable development; to establish policies, programmes and practices for conducting operations in an environmentally sound manner.

INTEGRATED MANAGEMENT To integrate these policies programmes and practices fully into each business as an essential element of management in all its functions.

PROCESS OF IMPROVEMENT To continue to improve corporate policies, programmes and environmental performance, taking into account technical developments, scientific understanding, consumer needs and community expectations, with legal regulations as a starting point; and to apply the same environmental criteria internationally.

EMPLOYEE EDUCATION To educate, train and motivate employees to conduct their activities in an environmentally responsible manner.

PRIOR ASSESSMENT To assess environmental impacts before starting in a new activity or project, and before decommissioning a facility or leaving a job.

PRODUCTS & SERVICES To develop and provide products or services that have no undue environmental impact and are safe in their intended use, that are efficient in their consumption of energy and natural resources, and that can be recycled, reused or disposed of safely.

CUSTOMER ADVICE To advise, and where relevant educate customers, distributors and the public in the safe use, transportation, storage and disposal of products provided, and to apply similar considerations to the provision of services.

FACILITIES & OPERATIONS To develop, design and operate facilities and conduct activities taking into consideration the efficient use of renewable resources, the minimisation of adverse environmental impact and waste generation, and the safe and responsible disposal of residual waste.

RESEARCH To conduct or support research on the environmental impacts of raw materials, products, processes, emissions and wastes associated with the enterprise and on the means of minimising such adverse effects.

PRECAUTIONARY APPROACH To modify the manufacture, marketing or use of products or services or the conduct of activities, consistent with scientific and technical understanding, to prevent serious or irreversible environmental degradation.

CONTRACTORS & SUPPLIERS To promote the adoption of these principles by contractors acting on behalf of the enterprise, encouraging and, where appropriate requiring improvements in their practices to make them consistent with those of the enterprise; and to encourage the wider adoption of these principles by suppliers.

EMERGENCY PREPAREDNESS To develop and maintain, where significant hazards exist, emergency preparedness plans in conjunction with the emergency services, relevant authorities and the local community, recognising potential trans-boundary impacts.

TRANSFER OF TECHNOLOGY To contribute to the transfer of environmentally sound technology and management methods throughout the industrial and public sectors.

CONTRIBUTING TO THE COMMON EFFORT To contribute to the development of public policy and to business, governmental and intergovernmental programmes and educational initiatives that will enhance environmental awareness and protection.

OPENNESS OF CONCERNS To foster openness and dialogue with employees and the public, anticipating and responding to their concerns about potential hazards and impacts of operations, products, wastes or services, including those of trans-boundary or global significance.

COMPLIANCE & REPORTING To measure environmental performance, to conduct regular environmental audits and assessments of compliance with company requirements, legal requirements and those principles; and periodically to provide appropriate information to the Board of Directors, shareholders, employees, the authorities and the public.

10. Site Specific Environmental Considerations

Head Office (Garboldisham)
Head office is a large site situated in a rural location. The site is split into two distinct areas; main site containing office and workshop areas and is the main storage area for plant and equipment. This is a busy working environment with various risk factors processes and aspects. The second area is the storage area at the back of the main site. This is a less used area with the potential to contain various ecological aspects which are to be investigated along with the potential to create areas of positive environmental impact, such as tree belts or hibernacula for reptiles.

St Neots depot
St Neots is a small TM depot in a rural location. There is minimal environmental risk or impact. Battery Recycling is the primary environmental aspect with a minor risk of POL spillage.

Kelvedon Depot
Kelvedon depot is situated on a busy industrial site. It is primarily a TM site. There is minimal environmental risk or impact. Battery Recycling is the primary environmental aspect with a minor risk of POL spillage.

Woking Depot
Totally TM storage and office site. Minimal environmental impact. Located on existing industrial area. Battery storage/recycling being the primary environmental concern.

11. Environmental Impacts & Aspects Register

IMPACTS & ASPECTS	SITE				SIGNIFICANCE			Lead and Secondary Responsibility	CONTROLS / NOTES
	HEAD OFFICE	KELVEDON DEPOT	ST NEOTS DEPOT	Woking	L	M	H		
Air Emissions from Heating	Y	Y	Y	Y	L			HSEQ Manager Workshop Manager	Regular servicing and maintenance of heating systems. Policy of minimal usage
Air emissions from Welding	Y				L			HSEQ Manager Workshop Manager	Some minor emissions of fumes to the environment during welding operations
Air emissions from Dust	Y					M		HSEQ Manager Workshop Manager	A large amounts of dust is created during the dry months from plant movements on site Workshop Manager to arrange regular damping down of the area
Noise from Maintenance	Y				L			HSEQ Manager Workshop Manager	Small amount of noise created does not travel due to site configuration
Noise from Plant Movements	Y				L			HSEQ Manager Workshop Manager	Small amount of noise created does not travel due to site configuration
Waste Domestic	Y	Y	Y	Y	L			HSEQ Manager Workshop Manager	85% of waste is recycled
Waste Controlled Paints / Solvents	Y						H	HSEQ Manager Workshop Manager	Segregation for other waste and disposed of to licensed collection company
Waste Controlled Batteries	Y	Y	Y	Y			H	HSEQ Manager Battery Shop Manager	Cone lamp batteries are collected in storage bins and are collected by the supplier for recycling
Waste Controlled	Y					M		HSEQ Manager	Waste oil is collected on site and recycled; a small

Used Oils (POL)								Workshop Manager	amount is used as heating fuel for workshops.
Waste Controlled WEEE	Y	Y	Y	Y		M		HSEQ Manager Workshop Manager	
Fuel use Domestic	Y	Y	Y	Y		M		HSEQ Manager General Manager	
Fuel use Vehicles / Plant	Y	Y	Y	Y		M		HSEQ Manager Transport Manager	
Fuel use Storage	Y					M		HSEQ Manager Workshop Manager	Storage of heating and plant fuels are in bunded storage tanks.
Fuel use Refuelling	Y	Y					H	HSEQ Manager Workshop Manager	Storage of fuels is in bunded storage tanks.
Wash Down Chemical Runoff	Y						H	HSEQ Manager Workshop Manager	See EA consent to discharge trade effluent
Damage to Site Ecology	Y				L			HSEQ Manager Workshop Manager	
Damage to Site Watercourses	Y				L			HSEQ Manager Workshop Manager	

12. GLOSSARY:

LIST OF ABBREVIATIONS

ACOP	Approved Code of Practice
BATNEEC	Best Available Technique Not Entailing Excessive Cost
COSHH	Control of Substances Hazardous to Health
HASWA	Health and Safety at Work (etc) Act 1974
HSR	Health and Safety Representative
HSE	Health and Safety Executive
HS&W	Health, Safety and Welfare
LA EHO	Local Authority Environmental Health Officer
MHSWR	Management of Health and Safety at Work Regulations
NSR	Nominated Safety Representative
PEE&A	Portable Electrical Equipment and Appliances
PPE	Personal Protective Equipment
RIDDOR	Reportable Injuries, Diseases and Dangerous Occurrence Regulations
SSoW	Safe System of Work
WEL	Workplace Exposure Limit
HABAP	Highways Agency Biodiversity Action Plan
HSEF	Health Safety and Environmental Forum
WEEE	Waste Electronic and Electric Equipment
POL	Petrol's, Oils and Lubricants
EA	Environment Agency

Revision Date	Amendment	Authorised by:	Version No.
15-May-2013	Initial Issue	HSEQ Manager	1
10-June-2013	Aspects & Impacts register	HSEQ Manager	2
11-Oct-2013	Annual Review	HSEQ Manager	3
11 October 2014	Annual Review	H&S Manager	4
24 August 2015	Annual Review (Incorporation of new Woking Depot)	HSEQ Manager	5
19/7/16	Review	HSEQ Manager	6
20/7/17	Review	HSEQ Manager	7
9/2/18	Review	HSEQ Manager	8
20/12/18	Review	HSEQ Manager	9