



EMS 001

Environmental Policy

April 2018

1. Environmental policy statement

Allard Construction Ltd. is a construction and roofing contractor operating throughout the United Kingdom. We are committed to maintaining the highest standards, with particular regard to avoiding and minimising our impact on our environment.

We recognise that we all share one planet, with limited natural resources and record levels of global pollution. As a responsible organisation, we therefore have a duty to protect the environment beyond simple legal and regulatory compliance and seek ways to limit or offset our impacts wherever possible.

We strive to continually improve our environmental performance through responsible procurement practices, the reduction and control of waste, prevention of pollution, protection of environmentally sensitive locations or natural habitats, and conserving natural resources

Maintaining an effective environmental management system in line with the requirements of BS EN ISO 14001:2015 provides a framework which helps us to achieve our environmental aims and objectives. These include:

- prevention of injury, ill health and loss of life;
- compliance with all relevant environmental legislation and other requirements;
- identifying and controlling our environmental impacts;
- prevention of pollution to land, air or water;
- maintaining effective procurement strategies to reduce raw material consumption;
- reducing waste and disposal to landfill;
- efficient energy consumption;
- reducing emissions to atmosphere;
- increasing awareness of environmental issues;
- influencing design by offering solutions to reduce environmental impacts;
- providing appropriate environmental information and guidance to employees, and;
- continually improving our environmental performance.

This policy shall be communicated to all of our employees and everyone else working on our behalf. It is the responsibility of each and every person to fully comply with the requirements outlined within this policy; in particular, by co-operating and carrying out their work in such a manner that does not endanger the environment.

In order to continually improve our environmental management system, we aim to review this policy and its contents as often as required for it to be effectively implemented. In addition, regular management reviews, attended by members of top management, shall take place at intervals of no greater than twelve months.

This policy is accessible to interested parties through the Allard Construction Ltd website, server, noticeboards, reception areas and is available upon request.



Jerry Sullivan
Managing Director

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3. Introduction

The construction industry is a major user of the earth's resources and produces vast quantities of construction and demolition waste. It affects the environment in ways which will have lasting effects on the lives of generations to come.

Everyone working in the construction industry has a special and shared responsibility for the environment and we take this responsibility very seriously. Caring for our environment has been part of our culture for a long time and every day we endeavour to work to the highest environmental principles.

Allard Construction Ltd fully supports the aims and objectives of the Environmental Protection Act 1990 and will co-operate fully with the requirements of the Environment Agency, Natural Resources Wales, Scottish Environmental Protection Agency, relevant local authorities, and all other regulatory or enforcing bodies.

The purpose of this document is to act as an introduction to the wider environmental management system and should be read in combination with our Health & Safety and Quality policies to fully understand our approach to responsible business.

This policy document shall be made available to all employees and any other interested parties. Those with appointed responsibilities for the environmental management system shall ensure that a copy is displayed in a prominent position at all temporary and permanent offices under our control.

4. Environmental impacts

Each day we are faced with a number of environmental issues that relate specifically to our industry. The key areas of concern include, but are not limited to:

- water pollution;
- noise pollution;
- airborne pollution;
- contaminated land;
- waste;
- visual pollution;
- energy consumption, and;
- biodiversity.

5. General arrangements

Our general aim is to plan our activities and implement control measures sufficient to protect the environment, ensure compliance with relevant statutory provisions and client requirements associated with our works. We seek to do this in such a way that we avoid the need for complaints or any issue of enforcement (improvement or prohibition) notice, or prosecution.

We will achieve this aim by:

- mitigating the environmental impact of our operations by paying attention to the environmental risks posed by our work;
- listening to the concerns of the local and wider communities affected;
- minimise resource use through planning, sustainable procurement and reuse where possible;
- monitoring utilities consumption;
- selecting offices, facilities, vehicles and equipment which use energy saving technologies;
- encouraging environmental awareness among staff, suppliers and sub-contractors;
- being proactive and reviewing our policies in line with real-time environmental concerns;
- seeking alternative design solutions to reduce environmental impacts where possible;
- assessing our environmental impacts in line with our objectives and targets, and;
- obtaining prior consent for certain activities being carried out, where it is our responsibility to do so.

6. Roles and responsibilities

Responsibility for effective management of the environmental management system are categorised according to the following roles:

- Managing Director
- Director(s)
- Operations Manager(s)
- Health & Safety Manager
- Contracts and Office Manager(s)
- Site Supervisor(s)
- Operatives and employees

6.1. *Managing Director*

The Managing Director holds a 'Top Management' position in line with the definitions provided by BS EN ISO 14001:2015 and has overall responsibility for daily operations. The Managing Director is ultimately responsible for environmental issues and ensures that the company objectives and system are developed, implemented and managed to a beneficial conclusion.

The Managing Director has overall responsibility for the environmental management system, and in particular:

- approving the environmental policy and objectives;
- ensuring that the correct organisational structure and resources are in place to support these objectives;
- promoting the policy and objectives to employees to increase awareness, motivation and involvement;
- periodically reviewing the environmental management system, and;
- appointing a management representative to monitor and report on the development, performance and improvement of the environmental management system.

6.2. *Directors*

Other Directors also hold a 'Top Management' position in line with the definitions provided by BS EN ISO 14001:2015 and provide executive direction for daily operations. Regarding the environmental management system, company directors are responsible for:

- facilitating engagement between the Managing Director and the environmental management system;
- ensuring that the correct organisational structure and resources are in place to support these objectives;
- providing environmental leadership and actively participating in the maintenance of the environmental management system, and;
- directing management under their control to implement the environmental policy at all times.

6.3. *Operations Manager(s)*

The Operations Managers are responsible for:

- reviewing and approving changes to the environmental management system which affect daily operations;
- facilitating engagement between the Directors and the environmental management system, and;
- ensuring that those working under their control are aware of the environmental policy and any specific duties they may hold.

6.4. Health & Safety Manager

The Health & Safety Manager is responsible for:

- providing advice and support to the business on environmental matters or issues;
- development and continual improvement of the environmental management system;
- auditing against applicable standards and requirements;
- visiting site regularly and monitoring environmental performance;
- representing Allard Construction Ltd in communication with the Environment Agency, Natural Resources Wales, the Scottish Environmental Protection Agency, local authorities or other external enforcing authorities or organisations;
- ensuring thorough investigations take place following environmental incidents;
- advising on environmental training requirements, and;
- controlling, publishing and maintaining environmental documentation.

6.5. Procurement Manager

The Procurement Manager is responsible for:

- reviewing and approving the company procurement policies;
- checking the environmental performance of suppliers and subcontractors for incidents, fines, enforcement action or prosecution relating to environmental offences prior raising orders;
- arranging audits of suppliers and subcontractors with the Health & Safety Manager as necessary, and;
- being familiar with statutory provisions relating to ethical and responsible procurement for specific contracts.

6.6. Contracts and Office Managers

Each Contracts Manager is responsible for:

- ensuring that those working under their control are aware of the environmental policy and any specific duties they may hold;
- ensuring that site supervision effectively implements all necessary environmental controls, and;
- arranging audits of sites or offices with the Health & Safety Manager as necessary.

6.7. Site supervision

It is the responsibility of site supervision to:

- be familiar with environmental requirements and comply with all relevant legislation;
- ensuring that all potentially polluting substances or materials are correctly handled and stored;
- ensure that relevant COSHH assessments are in place and communicated to those at risk;
- ensure that operatives are aware of the company's policy for environmental management and that they have understood its requirements;
- report all environmental incidents to the Health & Safety Manager;
- implement any advice given by the company Health & Safety Manager;
- attend any environmental training arranged by the company;
- ensure that operatives are suitable, competent, trained and authorised to carry out their work;
- provide effective front-line supervision on site and ensure that operatives are instructed in the detail of environmental protection as it applies to construction operations, and;
- encourage operatives to work in an environmentally acceptable and tidy manner, and where necessary, disciplining offenders.

6.8. Operatives and employees

All operatives and employees, including sub-contractors and any other persons working on our behalf are responsible for:

- being familiar with this policy and co-operating with management and supervision in its implementation;
- understanding the parts of this policy applicable to them and take part in the protection of the environment;
- following the instructions given regarding the prevention of pollution;
- keeping equipment in good order, using the correct equipment for the task and reporting any defects to their manager or supervisor, and;
- contributing to a responsible culture; being aware of, and following, relevant site environmental rules.

7. General preventive measures

7.1. Water pollution

We will take every reasonable precaution to ensure the protection of rivers, streams and other watercourses by:

- ensuring that environmental permits are obtained from the Environment Agency (or similar) before discharge into a watercourse takes place, and make provisions made to ensure such discharge is safe;
- agreeing control measures with the Environment Agency (or similar) where there is a risk of contamination to a watercourse;
- giving required notice to the Water Authority before commencing works near a foul tank or trunk sewer;
- promptly reporting environmental incidents involving watercourses to the Environment Agency (or similar), and;
- only undertaking concrete wash out (or similar) at agreed locations where resulting effluent cannot flow into watercourses and drains. Wherever possible we will minimise concrete wash out on site and encourage suppliers to use facilities at the production plant.

7.2. Noise pollution

As the majority of our works are carried out at height, or on exposed rooftops, noise carries further. We recognise that noise is a very sensitive issue. For this reason, we will assess areas of concern before commencing work. This is especially important when operating near hospitals, schools, residential areas and places of work. We will:

- based on the works, assess environmental noise impact;
- consider alternative construction methods, which offer the minimum noise levels;
- maintain plant and equipment to ensure optimum performance and eliminate avoidable noise;
- use noise reduction screens where necessary, and;
- restrict working hours to avoid particularly noise-sensitive times, such as nights or weekends, wherever possible.

7.3. Airborne pollution

The effects of airborne pollution shall be considered by site teams. Fundamental factors they will need to consider include:

- the ease with which particles contained in dust and smoke can spread, especially in strong or prevailing winds;
- the consequent danger to people in the immediate area and further afield where operations will create dust.

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Appropriate actions shall be taken to keep air pollution levels to a minimum. These include:

- sheeting skips to prevent the escape of dust, particularly during transportation;
- using a water suppressant or vacuum device whilst cutting, grinding or similar;
- using vehicle speed restrictions and damping down roads which may have become dirty or dusty, and;
- managing stockpiles to reduce dust.

7.4. *Visual pollution*

Perceptions of correct environmental behaviour is often influenced by a variety of visual signals. We will do everything we can to behave in an environmentally sensitive way, but also to be seen to be doing so. The following actions will therefore be taken in and around our operational sites:

- site boards and public information signs will be kept clean and will comply with local requirements;
- access routes will be properly marked, and;
- good housekeeping shall be maintained with materials properly stored, waste regularly cleared and vehicles sensibly parked.

7.5. *Waste*

In recognition of the fact that the earth's resources are finite, every step possible will be taken to minimise waste through the implementation of the waste hierarchy as outlined within Section 12 (1) of The Waste (England and Wales) Regulations 2011. So far as reasonably practicable, we shall:

- prevent waste through effective procurement strategies and resource use;
- re-use waste material in its current state if safe and legal to do so;
- recycle waste;
- recover energy from waste (e.g. combustion), and;
- dispose of waste only once all other options have been exhausted.

Only licensed waste carriers shall be used to transport waste and thorough duty of care checks will be carried out prior to any movements taking place.

In order to prevent the unnecessary or illegal disposal of waste, when necessary, ACL may carry waste in relation to its works. ACL is a registered upper tier waste carrier and dealer (CBDU64621).

7.6. *Energy consumption*

Where possible, energy consumption shall be monitored with a view to seeking opportunities for reduction.

Our overall strategy on responsible management of energy consumption relies on all Allard employees:

- switching equipment (laptops, monitors, lights etc.) off when not in use;
- minimising the use of artificial lighting through efficient use of natural lighting;
- replace all compact fluorescent lamp (CFL) bulbs with light emitting diode (LED) bulbs in premises under our control;
- reducing paper consumption through responsible printing and always printing double sided;
- using programmable thermostats to reduce heating during off-peak hours;
- monitoring for air leaks which affect efficient heating and cooling, and;
- using tele or video conferencing technologies as an alternative to face-to-face meetings.

7.7. Carbon and greenhouse gas emissions

Our strategy of reducing or offsetting our emissions relies heavily on our responsible management of energy consumption. In addition however:

- all plant and equipment is to be maintained and inspected according to manufacturer's instructions;
- company owned, and operated vehicles shall generally be unleaded where possible, however alternatively fuelled vehicles are encouraged; these are considered to be less polluting than equivalent diesel vehicles, resulting in less harmful particulates being released to atmosphere.
- vehicles operated by the company shall be serviced in accordance with the manufacturer's details to maintain efficiency and minimise pollution, and;
- we shall seek opportunities, through renewable energy or green investment, to offset our emissions wherever possible.

7.8. Water consumption

Where possible, water consumption shall be monitored with a view to seeking opportunities for reduction wherever practical.

7.9. Responsible timber procurement

The UK government recognises wood certified under the FSC and PEFC schemes as "verified legal and sustainable". In line with these policies, Allard Construction Ltd. will ensure that we, and our wider supply chain, only procure timber, timber products and timber sheet materials from FSC or PEFC schemes. Those which cannot demonstrate they are from FSC or PEFC schemes shall not be used.

8. Continual improvement

8.1. Audit

An audit is a systematic, independent, evidence gathering process which aims to evaluate how well audit criteria are being met. In order to effectively manage the environmental management system, we aim to conduct regular internal, environmental audits to assess conformance to:

- all relevant environmental legislation, corporate and other requirements;
- the requirements of BS EN ISO 14001:2015, and;
- this policy.

8.2. Non-conformance and corrective action

A non-conformance is a non-fulfilment of a requirement which identifies a failure or gap in a management system.

Non-conformance can be raised through a variety of means, these include, but are not limited to:

- audits;
- inspections;
- complaints;
- observations;
- incidents, or;
- enforcement action.

All non-conformance shall be recorded and corrected as soon as reasonably practicable. It may also be necessary to take corrective or preventative action in order to prevent recurrence or prevent a similar non-conformance occurring elsewhere.

8.3. *Management review*

Top management shall attend an annual Management Review meeting which will review the effectiveness of the environmental management system and determine actions for continual improvement. The results of this meeting shall be maintained as documented information.

9. **Version control**

Version Number	What has changed and why?	Date
1	Incorporated into the Allard Construction Ltd. environmental management system. Version number reset to 1.	18/04/2018

10. **Authorisation**

This document has been approved as part of the Allard Construction Ltd. Environmental Management System:

P.S. Fletcher

Paul Fletcher, Health & Safety Manager, Allard Construction Ltd.