

## BJH Environmental Policy



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### **Part 1**

#### **Statement of Environmental Policy**

BJH CONTACTS UK LTD recognise and accepts its legal and moral duties and responsibilities in conducting its business in such a way as to minimise harm to the environment and to promote a positive environmentalist culture amongst its own employees and all others with whom it interacts.

BJH CONTACTS UK LTD will take all reasonable practicable steps within its power to meet this responsibility and will ensure that in particular it abides by the Environmental Protection Act 1990 and all other relevant legislation pertaining to environmental issues.

The directors will require all levels to display a positive attitude and commitment towards environmental issues.

Directors and staff have individual responsibility to ensure, through their respective roles, that methods of working encompass environmental best practice within all BJH CONTACTS UK LTD premises. Each individual should ensure that they are familiar both with their own duties, the steps they should take to remedy any potential environmental hazards and the requirements of the BJH CONTACTS UK LTD Environmental Policy.

Contractors working for BJH CONTACTS UK LTD, whether on the premises or within the community must ensure that their activities cause minimal harm to the environment and that they are in accordance with the spirit of the BJH CONTACTS UK LTD Environmental Policy.

The directors recognise the importance of the co-operation of employees for the success of its Environmental Policy. It has, therefore, a strong commitment to involving employees in the development and implementation of its Environmental Policy as well as providing adequate facilities and information to enable them to perform this function.

The directors will provide appropriate resources, training and information for all managers to assist them in implementing the BJH CONTACTS UK LTD Environmental Policy and to adhere to the relevant statutory requirements.

## **Part II**

### **Details of BJH CONTACTS UK LTD And Arrangements for carrying out the Environmental Policy**

#### **General Statement of Intent**

Planned prevention or reduction of pollution is cheaper than curing damage after the event. It is therefore in the interest of BJH CONTACTS UK LTD to minimise waste and pollution so as to reduce the costs in the long-term.

This Environmental Policy Statement forms a code of ethics against which BJH CONTACTS UK LTD is willing to be judged. It incorporates codes of good practice for all workers in which consideration and mitigation of the environmental impact of each job is implicit. Each worker should have in written form an explanation of the overall company policy and a list of their individual responsibilities within that plan, which should include suggesting ways of improving environmental protection and pollution control.

BJH CONTACTS UK LTD is a part of the local and wider community and, as such has an impact on the environment in the local vicinity of its sites and more widely by bringing in raw materials and energy, distributing its services and discharging emissions and wastes. Hence BJH CONTACTS UK LTD is committed to:

1. Minimise any disturbance to the local and global environment and to the quality of life of the local communities in which BJH CONTACTS UK LTD operates.
2. Comply fully with all relevant Statutes.
3. Take positive steps to conserve resources, particularly those, which are scarce or non-renewable.
4. Assess in advance where possible, the environmental effects of any significant new development and adjust its plans accordingly.
5. Provide the information necessary to enable BJH CONTACTS UK LTD products to be properly used, stored and disposed of so as to avoid unacceptable effects on man or the environment.
6. Provide the necessary information to enable employees to operate properly with minimal effects on man or the environment.
7. Keep the public informed of major new projects in their locality.

The overall objective is to develop the business having full regard to the environment and taking into account the views of all affected interests.

#### **BJH CONTACTS UK LTD sets out its environmental strategy in order to achieve the objectives of its environmental policy, which is set out as follows, it will:**

- Consider all activities, including those parts of the operation, which are already considered to be efficient.
- Create a benchmark to enable improvements to be evaluated, determining what Regulations and Standards are relevant and what technological developments have occurred recently.
- Record raw material and energy usage, wastes and emissions, etc.
- Seek opportunities to turn waste into profitable by-products or to recycle and explore the possibility of more effective and economic methods of waste disposal.
- Encourage employees to provide suggestions for improvement.

- Explore whether energy and raw material usage and the production of waste could be further reduced.
- Ensure contractors perform to BJH CONTACTS UK LTD satisfaction.
- Set up the means to enable BJH CONTACTS UK LTD to maintain good links with the local and global community, press and the media.
- Monitor performance and review on a regular basis.

## **PARTICULARS OF THE ARRANGEMENTS TO IMPLEMENT THE POLICY**

The Directors have overall responsibility for the implementation of the policy, and should be supported by all employees who should:

- Monitor and review the policy on a regular basis in conjunction with Management to take into account changes in the business of BJH CONTACTS UK LTD and legislative change or current guidance and best practice.
- Develop an audit process in detail and set environmental performance targets.
- Identify persons within the line management structure and allocate specific responsibilities. Oversee training of such persons in conjunction with the environmental policy.
- Integrate the policy into other strategic plans.
- Integrate the policy with health & safety, security and quality assurance.
- Liaise with employee representatives and include environmental matters in Management and safety committee meetings.
- Run a suggestion scheme.
- Appoint specified persons to environmental roles within their work area/sphere of operations.
- Monitor any required trade effluent consents.

## **SUB-CONTRACTORS**

Sub-contractors should be made aware of the Environmental Policy and given a document that summarises it and states what is required of them. Such as:

- That they shall dispose of waste arising in accordance with BJH CONTACTS UK LTD rules.
- That they should not dispose of special/hazardous waste improperly but should seek advice from BJH CONTACTS UK LTD where necessary.
- That their activities should not pollute water or the air unnecessarily.
- That noise or any other statutory nuisance is kept to a minimum.
- That their housekeeping should be to an adequate standard when acting for BJH CONTACTS UK LTD.

## **ENERGY MANAGEMENT**

- Appointed persons at each site should be given the responsibility to ensure that energy use is minimised by carrying out routine checks on room temperatures, heating, electrical equipment, running water and lighting etc are switched off in unoccupied areas - i.e. to optimise the working environment.
- Purchasing policy should include matters such as replacement of lighting for low-energy bulbs where practicable, use of screen savers, draught excluder's etc.
- Purchasing policy should also include scrutiny of suppliers' environmental policies.
- Maintenance, refurbishment or alterations should include environmental considerations such as insulation and sustainable products.

## **WASTE MANAGEMENT**

The persons overseeing environmental concerns at each of BJH CONTACTS UK LTD sites should also oversee all waste licensing arrangements and should act in accordance with the current waste management code of practice, which requires that an audit trail be established for all wastes arising.

In particular the management of trade waste should be optimised in conjunction with the adjacent Local Authority Waste Disposal facility.

- Hardcore and general waste should be disposed of into separate receptacles.
- Metals should be segregated.
- Low-density waste should be compacted before disposal (cardboard boxes etc).
- Packaging waste should be managed in accordance with government guidelines.

## **CHEMICAL POLLUTANTS**

The use of chemicals should be identified. Risk assessments and method statements should be undertaken to ensure safe working practices that are also environmentally friendly. There is a link here to C.O.S.H.H. assessments that are carried out under the health and safety arrangements. Advice should be sought from the health and safety coordinator.

## **ENVIRONMENTAL EMERGENCY ARRANGEMENTS**

Environmental emergencies can occur in a number of conceivable ways, e.g. fire or spillage of pollutants. Environmental risk assessments should be carried out and measures to prevent or reduce the probability of such events formulating. If necessary measures to mitigate the consequences should be put in place (e.g. stocks of absorbent material for chemical spillages)

### **Part II (a)**

#### **LOCAL ARRANGEMENTS**

The persons listed below are responsible for the arrangements at the site named:

Ben Holleron and Stacey Holleron - BJH CONTACTS UK LTD Directors

### **Part III**

#### **RELEVANT CODES AND STATUTES**

THE AIR QUALITY (ENGLAND) (AMENDMENT) REGULATIONS 2002

CHIP REGS 1994

CLEAN AIR ACT 1993

CONTROLLED WASTE REGS 1992

ENVIRONMENTAL PROTECTION ACT 1990

ENVIRONMENTAL INFORMATION REGULATIONS 2004

ENVIRONMENTAL PROTECTION (DUTY OF CARE) 1991

ENVIRONMENTAL AND SAFETY INFORMATION REGS 1988

ENVIRONMENTAL ACT 1995

NOISE AND STATUTORY NUISANCE ACT 1993

OIL STORAGE REGS 2001

SURFACE WATER REGS

SPECIAL WASTE REGS 1996

TOWN AND COUNTY PLANNING ACT 1990

TRADE EFFLUENT REGS 1992

WATER RESOURCES ACT 1991

WATER INDUSTRY ACT 1991

THE HAZARDOUS WASTE (ENGLAND AND WALES) REGULATIONS 2005

#### **Part IV**

#### **Notes on Waste Disposal and Emission Control**

#### **WASTE DISPOSAL**

All waste other than special waste must be disposed of in a manner required by the Environmental Protection (Duty of Care) Regulations 1991.

#### **IDENTIFY AND DESCRIBE THE WASTE**

A transfer note must be completed, signed and kept by the parties to the transfer if waste is transferred; this is a requirement of the Environmental Protection (Duty of Care) Regulations 1991, and any breach of those regulations is an offence. This note must state the quantity of waste transferred and how it is packed – whether loose or in a container and, if in a container, the kind of container. There must also be a description of the waste, either separately or combined as a single document with a transfer note. It is good practice to label drums or similar closed containers with a description of the waste. Under the regulations the parties must keep the transfer note and the description for two years. The description should always mention any problems, requirements or knowledge. In addition it should include a combination of:-

- The type of premises or business which the waste comes from;
- The name of the substance or substances;
- The process that produced the waste;
- A chemical and physical analysis.

Containers must only contain the waste described in the transfer note.

#### **KEEPING WASTE SAFELY**

All waste holders must keep waste safe against:-

- Corrosion or wear of containers;
- Accidental spilling or leaking;
- Accident or weather breaking contained waste open and allowing it to escape;

- Waste blowing away or falling while being stored or transported;
- Scavenging of waste by vandals, thieves, children, trespassers or wild animals.

### **TRANSFER OF WASTE**

Waste may only be handed on to authorised persons or to persons for authorised transport purposes. A copy of the waste carrier's registration normally covers a 3 year period and must be retained.

### **SPECIAL WASTE**

With reference to the Special Waste Regulations 1996 before any waste leaves the site the appropriate site manager/supervisor must:-

- Parts A&B of a five copy consignment note must be completed.
- Waste must only be transferred to a registered waste carrier.
- Copies of the consignment note must be kept for three years.
- The Environment Agency must be informed at least three clear working days before the waste is moved.

Typical wastes are acids, alkaline solutions, batteries, solvents, waste oil and wood preservatives.

### **EMISSION CONTROL**

- The design, specification, installation and control of company plant shall be regulated to ensure that, so far as is reasonably practicable, the generation of dust, smoke, fumes etc is minimised and effectively controlled to prevent emissions to the atmosphere.
- It is the duty of every employer to ensure that plant or processes are operated so as not to give rise to excessive emissions of smoke, dust, fumes or liquids etc and to report without delay, to management and/or safety representatives, any undue or accidental emissions in order that remedial action can be taken.
- "Emission" shall be understood to include the localised generation of sparks, dust etc, from operations such as welding and grinding. Employees must ensure that appropriate guards and screens are used to prevent danger from airborne particles to other employees and passers-by.