

EFT Group

Environmental Management System

Internal (Unaccredited)

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EFT Group

Environmental Management System

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Managing our activities

Our EMS is structured to help our business identify the environmental impacts resulting from our activities. It also helps manage and reduce those impacts, so that the environmental performance of the organisation is improved. This EMS will provide a methodical approach to planning, implementing and reviewing our environmental management.

We will therefore identify and control the risks that our activities pose to the environment and human health.

This EMS will:

- identify where efficiency savings can be made;
- ensure compliance with environmental legislation;
- identify and managing significant environmental impacts;
- provide benchmarks for improvement;
- help to manage resources.

It will also provide a way for our business to plan for and demonstrate that steps have been taken to reduce or prevent environmental harm occurring as a result of our operations.

It is the intention of EFT Group to operate an effective Environmental Management System. We will therefore manage and operate our activities:

1. in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and those drawn to our attention as a result of complaints; and
2. using sufficient competent persons and resources.”

We will ensure that an EMS is in place, that it is adequate for the activities taking place and that it's being implemented and communicated to all staff.

What will our EMS achieve?

An effective EMS will:

- Minimise or prevent the risk of pollution to the environment by our activities which are being undertaken.
- Be implemented at a strategic level and integrated into corporate plans and policies so that all our staff know their environmental responsibilities.
- Assess our organisation's environmental impacts and identify opportunities to reduce pollution to air, land and water.
- Reduce waste.
- Set out clear objectives and targets to minimise the significant environmental impacts.
- Record environmental performance against targets and industry performance indicators to encourage continual improvement.
- Ensure compliance with environmental legislation and take action to prevent and correct cases of non-compliance.
- Deliver good resource management and encourage sustainable development and financial benefits.
- Identify key interested parties and communicate company environmental performance to them clearly.

Identifying and minimising risks of pollution

This means that our staff are required to understand how the activities carried out by our organisation can interact with the environment and cause pollution. Every possible source of pollution will be identified and controlled. Once these potential sources of pollution are identified plans need to be put in place to minimise the chance of our activities causing environmental pollution.

A site plan or map can be useful in helping to identify the activities carried out on site. The map will include environmental considerations such as drainage (including both surface and foul drains), chemical and oil storage locations, location of waste skips, location of sample points for permits to discharge, wind direction, local neighbours, and potential areas of contaminated land and so on.

The site plan doesn't necessarily have to be a highly technical drawing but does need to represent all the main features of the site and be drawn to scale.

The route and final destination of the drains will also be identified on the plan.

Consider what is involved with each activity that takes place on the site and the pollution which may arise from it. Consider the pollution risks under normal operations as well as under abnormal operations, that is, when something goes wrong. Accidents can cause significant pollution over a short period of time and need to be minimised.

Consider at a minimum:

- Process operation
- Plant and machinery

- Waste disposal
- Solid waste management
- Emissions/discharges for example, noise and odour
- Water use/discharges
- Raw materials used
- Storage of materials on site
- Transportation and distribution
- Energy sources and usage
- Product design
- Packaging

Consider how any potential pollution from the above activities could impact on the following:

- Air
- Water
- Land
- Neighbours
- SSSI's,

Operations and maintenance

Written operating instructions will be provided to staff who are required to use any plant and equipment present onsite. The instructions will provide direction on how equipment is to be used to achieve the work objective and address any precautions which are to be taken as part of that work to ensure any risks to the environment posed by the use of the equipment are minimised or eliminated. These instructions will include details of what to do when things go wrong, that is, when the plant or equipment malfunction and how to stop a malfunction causing an adverse environmental impact.

As a minimum any maintenance advice provided by a manufacturer, supplier or installer will be followed. As many pollution incidents can be traced back to a maintenance failure it's

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very important that the EMS includes a plan for proactive and preventative not reactive maintenance of the plant and equipment used on the permitted site.

Table 5 which can be found in Annex two is a simple maintenance checklist which, if used properly, could provide a plan for proactive maintenance.

A record that the maintenance checks were actually carried out when they were scheduled will also be kept.

Environmental Audits

The audits are used to determine:

- a) Conformance to the management system
- b) Conformance with EMS
- c) Correct implementation and maintenance.

Results of internal audit provide information to the senior management team.

Audit programmes are based on:

- a) Environmental / Health and Safety importance of an activity
- b) Results of previous audits.

Audit procedures address audit scope, frequency and methodology together with defined responsibility for conducting and reporting audits.

EFT Group conducts management reviews a minimum of annually. The agenda follows the Quality Management Review with the Addition of the following:

- a) Review of Objectives and Targets and Improvement Plans
- b) Review of Management Programmes and Objectives and Targets
- c) Review of Significant New Legal Requirements

D) Results of any participation and consultation conducted
Records are kept of the reviews

Accidents

EFT will put in place an accident management plan which can be put into action as and when required. It will be clearly communicated to all employees, managers and contractors who work at the site.

An organisation's accident management plan will form part of our EMS. To produce an accident management plan the following steps will be taken:

- identify risks from the activities carried out that could damage the environment;
- assess how likely they are to happen and the potential environmental consequences;
- take action to minimise the potential causes and consequences of accidents;
- identify how to minimise the consequences will such accidents occur.

If an accident does happen and it may cause an adverse environmental impact, EFT Group will be expected to:

- immediately do what it says in the accident management plan;
- do whatever else is necessary to minimise the environmental consequences;
- take all precautions to ensure the health and safety of both employees and external people is not compromised;

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- find out why the accident happened and take action to stop it happening again;
- review the accident management plan.

The accident management plan will be reviewed at least every 4 years, if management or named responsible people change or as soon as possible after an accident. Any updates or changes needed must then be put into an updated accident management plan. If no changes are needed record the date of the review and the fact that no changes were needed.

An accident management plan will include:

- A site map, which will include all the information mentioned in section 2.2.1 as well as information on where accident response equipment such as spill kits and fire extinguishers are located.
- A list of key contacts and contact numbers.
- Information on preventing accidents which could occur on the site and what to do if an accident happens.

Incidents and non-conformances

All incidents and non-conformances will be recorded. This includes those reported by external people as well as those picked up in monitoring, reviews and audits of the site. Incidents that require investigation include any malfunction, breakdown or failure of plant or equipment or techniques and any near misses which affect or potentially affect the environment. Non-conformances include where the management system is not followed as well as non-compliances with the conditions in the permit.

If an incident or non-conformance occurs the EMS will be reviewed to find the root cause of the problem and steps will be taken to ensure that there is no re-occurrence. The findings of the review will be communicated to employees to ensure they understand any changes that need to be made to operations or procedures.

Table 8 will be useful in recording accidents and incidents which occur on site. Table 9 will be useful in recording non-conformances which occur on site. Both these tables can be found in the annexes.

Operatives will have site security measures in place, if necessary, to prevent unauthorised access to the site and any resultant pollution that unauthorised access may cause to the environment or human health.

EFT Group maintains procedures for dealing with non-conformance; these will identify responsibilities and authority for:

- Accident and incident Investigation
- Initiating corrective/preventative action.
- Identifying route cause
- Continual improvement activities
- Communicating the issues and effectiveness of actions taken

Records are maintained of implementation and changes of documentation resulting from corrective and preventative action.

Complaints

All complaints received by EFT Group about their activities will be recorded and acted upon. Table 10, in the annexes, contains an example complaints record form. If the site receives a complaint this form will be completed. The forms can be used as evidence

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that any complaints received have been taken seriously and that actions have been taken to rectify any problems identified.

Staff training and competence

There will be enough competent staff to manage and operate the sites activities without causing pollution. Staff will be competent in the activities they are expected to carry out. Staff are expected to not only be competent in normal situations but also be adequately trained so that they are competent in abnormal situations such as plant failures or accidents.

Staff roles and responsibilities will be clearly defined and names will be placed against each role and responsibility for example, who is the technically competent person for the site.

The training checklist and record forms tables 12 and 13 may help to ensure that the recording requirements for training received by staff are met. The training checklist can be used to identify the training required for each different role in the organisation. It will need to be modified for each specific site. The training requirements listed on the forms are examples only.

There is also a delegation of responsibilities form, table 14. This form is to be used when a member of staff is away from work, for example annual leave, on long term sick leave or on maternity leave. This is to ensure that the duties normally carried out by that person are delegated to another suitably trained person.

Odour, noise and emissions

The Environmental Regulations require the control of pollution including odour, noise and emissions. The potential impacts of these need to be controlled as they can have serious adverse impacts on the environment and human health. Odour, noise and emissions will be included as part of a sites EMS, as the plans will include information on how to minimise adverse impacts arising

from any odour, noise or emissions produced as part of the activities carried out on the site.

Documentation of legislation and other requirements

Operatives on site will keep a record of any applicable environmental obligations, permits, exemptions, codes of practice, legislation and any other requirements they are signed up to.

The legislation which is relevant to the activities will be kept, preferably on a register along with the names of those people in the organisation who are responsible for ensuring it is complied with.

EFT Group use the Environment Agency website

<https://www.gov.uk/government/organisations/environment-agency> to identify which legislation is applicable. Industry codes of practice, for example, quality protocols being used on the site and non-regulatory guidelines will also be adhered to. Table 15 contains an example register of legislation and other obligations. Remember in order for any EMS to be effective it will be implemented, and there will be evidence in the day to day activities taking place on the site that the EMS is being used.

The procedures ensure that:

- Documentation can be located
- Documentation is reviewed, revised and approved by authorised personnel
- The latest issues of documents are available issued at all appropriate locations
- Documentation is promptly withdrawn when obsolete
- Obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
- Procedures are maintained for the creation and modification of documentation. All procedures and

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work instructions carry issue status and issue dates.
All forms will carry issue status.

1 – Management

1.1 General management

1.1.1 EFT Group will manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of EFT Group as a result of complaints; and

(b) using sufficient competent persons and resources.

1.2 Avoidance, recovery and disposal of wastes produced by the activities

1.2.1 EFT Group will take appropriate measures to ensure that:

(a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

EFT Group will review and record at least every four years whether changes to those measures will be made and take any further appropriate measures identified by a review.

3 – Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

3.1.2 EFT Group will:

(a) if notified that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2 Odour

3.2.2 EFT Group will:

(a) if notified that the activities are giving rise to pollution due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.3 Noise and vibration

3.3.2 EFT Group will:

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(a) if notified that the activities are giving rise to pollution due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 – Information

4.1 Records

(d) be retained for at least 6 years from the date when the records were made.

4.1.2 EFT Group will keep all records, plans and the management system required to be maintained

Risk management and mitigation

Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Releases of particulate matter (dusts) and micro-organisms (bioaerosols).	Harm to human health - respiratory irritation and illness.	Air transport then inhalation.	High	Medium	High	Permitted waste types are inert and non hazardous and do not include dusts, powders or loose fibres and have a low potential to produce bioaerosols, but the treatment activities will produce particulate matter so a high magnitude risk is estimated. The permitted level of throughput and potential size of the facility means there is potential for exposure if anyone is living or working close to the site (apart from EFT Group and employees). There is potential for increased dust generation from permitted activities during prolonged dry periods e.g. summer months.	SR - Emissions of substances not controlled by emission limits (excluding odour and noise) will not cause pollution. EFT Group will not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	Low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	As above	Nuisance - dust on cars, clothing etc.	Air transport then deposition	High	Low	Medium	As above. Local residents often sensitive to dust.	As above	Low
Local human population, livestock and wildlife.	Litter	Nuisance, loss of amenity and harm to animal health	Air transport then deposition	Low	Low	Low	Local residents often sensitive to litter, however permitted waste types have low litter potential.	As above. Appropriate measures could include clearing litter arising from the activities from affected areas outside the site.	Very low
Local human population	Waste, litter and mud on local roads	Nuisance, loss of amenity, road traffic accidents.	Vehicles entering and leaving site.	Medium	Medium	Medium	Road safety, local residents often sensitive to mud on roads.	As above. Appropriate measures could include clearing waste, litter and mud arising from the activities from affected areas outside the site.	Low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Odour	Nuisance, loss of amenity	Air transport then inhalation.	Low	Low	Low	Local residents often sensitive to odour, however permitted waste types have low odour potential.	SR - emissions will be free from odour... SR (if required) - odour management plan.	Very low
Local human population	Noise and vibration	Nuisance, loss of amenity, loss of sleep.	Noise through the air and vibration through the ground.	Medium	Medium	Medium	Local residents often sensitive to noise and vibration	SR - emissions will be free from noise and vibration..... SR (if required) - noise and vibration management plan.	Low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Scavenging animals and scavenging birds	Harm to human health - from waste carried off site and faeces. Nuisance and loss of amenity.	Air transport and over land	Low	Medium	Low	Permitted wastes unlikely to attract scavenging animals and birds but may become nesting / breeding sites.	SR - Emissions of substances not controlled by emission limits (excluding odour and noise) will not cause pollution. EFT Group will not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	Very low
Local human population	Pests (e.g. flies)	Harm to human health, nuisance, loss of amenity	Air transport and over land	Low	Medium	Low	Permitted waste types unlikely to attract pests.	As above	Very low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population and local environment	Flooding of site	If waste is washed off site it may contaminate buildings / gardens / natural habitats downstream.	Flood waters	Low	Low	Low	Permitted waste types are inert and non hazardous so any waste washed off site will add to the volume of the local post-flood clean up workload, rather than the hazard.	SR -requires a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include flood risk management).	Very low
Local human population and / or livestock after gaining unauthorised access to the waste operation	All on-site hazards: wastes; machinery and vehicles.	Bodily injury	Direct physical contact	Medium	Low	Low	Permitted waste types are inert therefore only a low magnitude risk is estimated	SR - activities will be managed and operated in accordance with a management system (will include site security measures to prevent unauthorised access).	Low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population and local environment.	Arson and / or vandalism causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff, fire fighters or arsonists/vandals. Pollution of water or land.	Air transport of smoke. Spillages and contaminated firewater by direct run-off from site and via surface water drains and ditches.	Medium	Low	Low	Permitted waste types do not include any flammable materials so a low magnitude risk is estimated.	SR -requires a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances (will include fire and spillages).	Low
Local human population and local environment	Accidental fire causing the release of polluting materials to air (smoke or fumes), water or land.	Respiratory irritation, illness and nuisance to local population. Injury to staff or fire fighters. Pollution of water or land.	As above.	Medium	Low	Low	As above.	As above (excluding comments on access to waste). Permitted activities do not include the burning of waste.	Low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
All surface waters close to and downstream of site.	Spillage of liquids, leachate from waste, contaminated rainwater run-off from waste e.g. containing suspended solids.	Acute effects: oxygen depletion, fish kill and algal blooms	Direct run-off from site across ground surface, via surface water drains, ditches etc.	Low	Low	Low	Permitted waste types do not include sludges or liquids so only a medium magnitude risk is estimated. No point source emissions to water are permitted, but there is potential for contaminated rainwater run-off from wastes stored outside buildings especially during heavy rain.	SR - All liquids will be provided with secondary containment... (applies to non- wastes such as fuels). Run-off restricted by SR on emissions of substances , with appropriate measures. Wastes from potentially contaminated sites require analysis. Storage & spreading has distance limitations from watercourses.	Very low
All surface waters close to and downstream of site.	As above	Chronic effects: deterioration of water quality	As above. Indirect run-off via the soil layer	Low	Low	Low	Waste types are non-hazardous and inert so harm is likely to be temporary and reversible.	As above	Very low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Abstraction from watercourse downstream of facility (for agricultural or potable use).	As above	Acute effects, closure of abstraction intakes.	Direct run-off from site across ground surface, via surface water drains, ditches etc. then abstraction.	Low	Low	Low	Watercourse must have medium / high flow for abstraction to be permitted, which will dilute contaminated run-off.	As above. Also activities will be 50 metres from any spring or well, or from any borehole not used to supply water for domestic or food production purposes or 50m from any spring or well or any borehole used for the supply of water for human consumption. This must include private water supplies	Very low
Groundwater	As above	Chronic effects: contamination of groundwater, requiring treatment of water or closure of borehole.	Transport through soil/groundwater then extraction at borehole.	Low	Low	Low	Permitted wastes unlikely to contaminate groundwater.	As above	Very low

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Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Local human population	Contaminated waters used for recreational purposes	Harm to human health - skin damage or gastrointestinal illness.	Direct contact or ingestion	Low	Medium	Low	Unlikely to occur, but might restrict recreational use.	SR - Emissions of substances not controlled by emission limits (excluding odour and noise) will not cause pollution. EFT Group will not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. SR (if required) - emissions management plan.	Very low

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Data and information				Judgement			Action (by permitting)		
Receptor	Source	Harm	Pathway	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk management	Residual risk
What is at risk? What do I wish to protect?	What is the agent or process with potential to cause harm?	What are the harmful consequences if things go wrong?	How might the receptor come into contact with the source?	How likely is this contact?	How severe will the consequences be if this occurs?	What is the overall magnitude of the risk?	On what did I base my judgement?	How can I best manage the risk to reduce the magnitude?	What is the magnitude of the risk after management? (This residual risk will be controlled by Compliance Assessment).
Protected sites - European sites and SSSIs	Any	Harm to protected site through toxic contamination, nutrient enrichment, smothering, disturbance, predation etc.	Any	Medium	Medium	Medium	Waste operations may cause harm to and deterioration of nature conservation sites.	SR - Emissions of substances not controlled by emission limits (excluding odour and noise) will not cause pollution. EFT Group will not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions. At 500 metres or above, the potential hazards from the permitted activities pose a low risk to the broad sensitivity of species and habitats groups. The standard permit only applies at this distance or more. It is also a requirement of SR. Also activities will not be within 250 metres with the	Low
							group - Environmental Management System	presence of great crested newts, where it is linked to the breeding ponds of the newts by good	

Environmental Policy Statement

EFT Group, acknowledges the environmental implications of its activities and will ensure that all operations are carried out in order to achieve a high standard of environmental compliance.

Adam Watts, CEO recognize EFT Group's responsibility with regard to compliance with relevant environmental legislation standards and regulations and will work towards the most effective methods, and adopt a position of responsibility by committing to a policy of continuous improvement and pollution prevention.

This policy will be made available internally to our staff and externally to our suppliers, contractors and clients.

The environmental impact of any awarded contracts will be fully considered as an integral part of "new business" policy.

The principal contracting function of EFT Group is the provision of Building related solutions and allied services for Public Sector and RSL clients

In doing so we will:

- Provide guidance on recycling opportunities and promote the reuse of materials with a recycled content.
- Ensure compliance with all relevant legislation, regulations and standards
- Monitor progress on a regular basis with a view to improve environmental performance

CEO

Adam Watts

November 2019

Sustainability Communities Policy Statement

Approach to supporting corporate strategic priorities of up skilling local workforce, creating local employment opportunities, providing apprenticeships and other training opportunities.

EFT Group is committed to promoting sustainable development and we believe we can contribute to aspirations by making a difference to the local community in which we deliver our services. The following are examples of how we will contribute to corporate and social responsibility.

We recognise the need to attract, recruit and retain motivated people using a fair and consistent approach to allow us to be an employer of choice.

EFT Group's recruitment process is based on our quality procedures so that a consistent approach is maintained across the company and ensures compliance with all legal requirements. It also ensures that all managers and supervisors who are involved in bringing people into the organisation are aware of the importance of getting it right and what they need to do to recruit people. EFT Group has a robust procedure in respect of vetting and licensing of staff in accordance with BS7858 (Vetting and Screening) prior to working on any site in accordance with the requirements of the Private Security Industry Act 2001, and more recently Disclosure and Barring (DBS).

Our recruitment approach is as follows:

- Job Centre Plus
- Specialist Recruitment Agencies
- Publications - local press & industry journals
- Schools/colleges
- Connexion Partnership services

- Staff Referrals
- Internal recruitment and promotion

EFT Group – Employment and Skills Pledge

EFT Group will consider ways our service can create new employment opportunities and stimulate business opportunities locally by:

- Fair recruitment practices offering opportunities for all, including employees working within the supply chain. Value creation by offering training initiatives, apprenticeships and skills development to individuals for all ages and businesses
- Offering opportunities to contribute to the wider economic value of the area by developing a diverse business base and a diverse, skilled work force
- Actively encourage local firms to compete for sub contract work (CEEQUAL)
- Sourcing locally available materials
- Develop diversity and equality initiatives to encourage small firms, ethnic minority businesses, social enterprise and voluntary and community sector suppliers
- Training: jointly train our staff in equality, diversity and inclusion
- As a partnership we can demonstrate positive commitment by interviewing and recruiting disabled people by signing up to the Job Centre Plus Two Ticks symbol.

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Local Benefits

EFT Group commit to adopting the 'proximity theory' whereby, wherever reasonably practicable, we recruit new staff from within the community in which they are most likely to be employed. The company is committed to valuing and promoting diversity and opportunity in all areas of recruitment, employment, training and promotion. The Company will work towards an environment that is based on merit and inclusiveness, where all employees can develop their full potential, irrespective of their race, gender, marital status, age, disability, religion or sexual orientation.

The company is fully committed to the elimination of unlawful and unfair discrimination, and values the differences that a diverse workforce brings to the organisation.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in line with the company's disciplinary policy.

Workforce development

EFT Group recognises that the induction process and on-going staff development is key to welcoming and retaining staff to the organisation.

One of our current business development initiatives is to achieve 'Investors in People' accreditation which will formalise our arrangements in respect of on-going training for all of our employees. Our staff training policy ensures that we have sufficient reserves of trained and competent staff within each job set in order to meet the needs of the contracts we are working on but also allows the personal development of all our people, enabling them to be efficient and effective workers, competent in their particular profession or skill.

Training needs will be identified through the annual appraisal system which identifies individual needs in order for staff to achieve their own personal targets and to ensure that our members of staff

are proficient in the competencies identified. We will ensure that all training adds value to EFT Group and that of our clients' businesses.

Qualifications and Experience

We are fully committed to ensuring all employees have access to tools to develop a broad range of knowledge and skills, enabling them to take ownership and drive their personal development.

Learning can take place initially through a college course and then training is either provided through visits to manufacturers' factories and/or the opportunity to go on site with the manufacturer.

Initial induction programmes are provided for all key roles, followed by training with customer relations, good practice, and management development where appropriate.

We encourage continuous staff training and development both on site and within our offices. In order for our staff to keep on track with advances in technology, training and development plays a key part in the success of our business.

We currently have several employees who are on apprenticeship programmes with us, and several who have completed their apprenticeships and are now fully qualified engineers. All of our engineers are trained to the highest standard of City and Guilds qualification at college, and are provided with continuous on and off site training, including demonstrations and training on new and upcoming equipment and systems.

We include provisions for training courses in our yearly budget, and actively seek any local funding that may well be available to assist us with any of our training and development needs.

All our engineers are trained to the highest standards in City & Guilds 1 & 2.

Induction training for new employees, including those joining the company for a short period includes:

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Staff development will include the following initiatives:

- Site Level Training/Toolbox Talks
- Industry accredited courses
- Apprenticeship schemes
- Personal Performance Appraisal
- Operative Skills and Performance Review
- Annual training programme
- External training courses
- Employee award schemes relating to corporate identity, performance and customer focus.

EFT Group promise to:

- Ensure our recruitment policy is aligned to the requirements of the Security Industry Authority in respect of vetting and training
- Ensure that we are compliant with our transparent recruitment policy including our equal opportunity and diversity policy.

Resource Continuity and Assurance

EFT Group enjoys a committed workforce with little staff absence and a very low staff turnover. Many of our engineers have trained with us and are very much part of our family business.

This provides the platform for working relationships to be developed and we will ensure that the engineers have ownerships of their own portfolio of buildings. This will further increase the user experience of our electrical maintenance service.

Our contract managers are responsible for all human resource / personnel matters and will be supported by our Merseyside based HR Manager at our headquarters.

This team will have the people skills, experience and knowledge to look after the welfare, training, development and HR interests of our team. They will treat each employee as an individual, helping

them achieve their aspirations as this in turn will ensure the future success of the company and the service level that we are able to provide you.

Our policy is to create an environment in which our people want to be a contributing member of a successful team. We will look after their health and welfare, we will train them properly, and we will ensure that they are not expected to work in unsatisfactory conditions. We make every effort to ensure a balance between home and work life and ensure compliance with the Working Time Directive with regard to working hours and rest periods.

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How waste from sites will be reduced, reused and recycled

We recognise the impact that our operations can potentially have on the environment. We will work to ensure our operations are aligned so that we can make wider sustainable improvements whilst also producing community focused strategies.

We will comply and help to achieve business corporate sustainability targets and ensure compliance with the law with respect to waste management and recycling..

The environmental impact of our operations is monitored at company, contract and site levels across all of our work streams. With monitoring in place, we then initiate actions to reduce environmental impact, such as route planning and more energy efficient engines.

Through the EMS we are able to demonstrate our commitment to effective environmental management whilst also ensuring environmental legal compliance. In addition it allows us to:

- Develop systems continuously to achieve client environmental aspirations
- Ensure we are framework leaders in managing the environment
- Demonstrate commitment to environmental best practice

It is our intentions at all times to build a supply chain within the locality within which we operate. We commit therefore to establishing fully developed supply chains within the geographical area in which we are operating. For example, our current nearest supplier is just 4 miles away from our control centre. If we were awarded work across the region, we would identify appropriate supply chain provisions within that area, which both supports the local area and reduces our carbon footprint. Any sub-contractors will operate to our stringent standards using developed programmes and quality plans.

EFT Group recognises that all the products and services we procure have both environmental and social impacts and is committed to addressing these through our procurement procedures.

At all times EFT will promote the philosophy of sustainable repair and reuse rather than dispose and replace.

The primary way in which we can influence these impacts is through engaging with our supply chain. Therefore, the overall aims of our sustainable procurement policy are to:

- Provide a framework for bringing environmental and social criteria into procurement decisions,
- Seek assurance from our suppliers and contractors that the environmental and social impacts of the products and services we procure have been minimized.

We endeavour to achieve this by:

Complying with all relevant current statutory regulations that impact on purchasing, and requiring that suppliers and contractors, and their supply chains, do the same. Also, giving a preference to procuring environmentally sustainable materials and services which:

- Minimise climate change impacts
- Minimise ecological damage, such as loss of habitats and biodiversity
- Minimise the depletion of non-renewable resources
- Re-use, recycle, refill, recharge and recondition
- Ensure, where possible, all purchased goods have a recycled content
- Have a low embodied energy/high Green Guide to specification rating
- Reduce water use
- Are accredited to a recognised environmental standard

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- Gives a preference to procuring materials and services which are ethically sourced. For those goods and services being sourced from developing countries, we expect suppliers to demonstrate that minimum supply chain labour standards have been met.
- Uses local suppliers and contractors to minimise the environmental impact associated with transportation and to support the local economy, as appropriate.
- Encourages all suppliers and contractors to have a health & safety policy and health and safety management system in place.
- Encourages all suppliers and contractors to have an environmental policy and an environmental management system in place
- For small companies, encourages the adoption of environmental policies which lead to improved environmental performance.
- Continues to work with our suppliers to explore the challenges and opportunities associated with sustainable procurement.

Minimising carbon emissions and sustainable contract delivery

EFT Group acknowledges the impact that our operations may potentially have on the environment. The clear objective of EFT Group is to minimise any impact on the environment by maximising the sustainability of our service by:

- Provide a framework for bringing environmental and social criteria into procurement decisions,
- Seek assurance from our suppliers and contractors that the environmental and social impacts of the products and services we procure have been minimised.
- Complying with all relevant current statutory regulations that impact on purchasing and requiring that suppliers and contractors (and their supply chains) do the same.
- Giving a preference to procuring environmentally sustainable materials and services which:

- Minimise climate change impacts and ecological damage, such as loss of habitats and biodiversity
- Minimise the depletion of non-renewable resources
- Re-use, recycle, refill, recharge and recondition
- Ensure, where possible, all purchased goods have a recycled content
- Intelligent route optimisation to reduce our carbon footprint and thereby increasing our efficiency and effectiveness. All our vans are fitted with tracking devices, reducing unnecessary mileage and we can monitor their driving habits to ensure they are driving in accordance with our fuel efficient driving policy
- Our use of PDA's integrated with IT led contract administration provides field base efficiencies and reduces our paper based systems.
- Preventing pollution, reducing waste and ensuring that measures are implemented to protect and preserve natural habitats, flora and fauna;
- Considering the effects that our operations may have on the local community
- Promoting environmental awareness amongst our suppliers, contractors and partners by implementation of operational procedures;
- Seeking to work in partnership with the community by behaving in a considerate and socially responsible manner;
- Ensuring effective and expedient incident control, investigation and reporting

EFT is a business committed to continuously improving economic and environmental standards, whilst providing cost effective, sustainable solutions to your requirements. We commit to working with you to help you achieve your carbon reduction targets.

Environmental Control Measures

Table 1 Environmental impacts plan and controls

Table 1															
Site Activity:															
<p>The key pieces of environmental legislation affecting this sector are:</p> <p><i>(Add as many as apply to your site activities – you will ensure that this list is kept up to date for your site and covers all applicable legislation)</i></p>	<ul style="list-style-type: none"> • The Environmental Permitting (England and Wales) Regulations 2010. • Groundwater regulations 1998, SI 2746 • Water Resources Act 1991, as amended. • Environmental Protection Act 1990 • Control of Pollution (Oil Storage) (England) Regulations 2001, SI 2954 							<ul style="list-style-type: none"> • Hazardous Waste Regulations (2005) 							
	Process / Activity/Equipment	A	W	E	D	L	N	R	Process / Activity/Equipment	A	W	E	D	L	N
<p>Processes / Activities / Equipment at your site: (insert H or M or L where applies)</p> <p>List all the processes / activities / equipment at your site in these columns.</p> <p>Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.</p> <ul style="list-style-type: none"> ➤ Emissions to Air (including dust) - A ➤ Emissions to Water - W ➤ Energy Usage (for example, electricity, gas, oil) - E ➤ Waste Disposal - D ➤ Land Contamination - L ➤ Nuisance (i.e. noise or odour) - N ➤ Resource Consumption (for example, water, chemicals, not energy) - R 	e.g. Oil / water separator – operation	L	H	-	H	L	-	-							
	Fuel Delivery and offloading														
	Chemicals storage														
	Surface water drainage														
	Sorting														
	e.g. Boilers for raising steam	H	-	H	-	-	M	M							
	<i>Others: (specify)</i>														

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Environmental impacts plan and controls (Table 1 - Continued)

Table 1																	
Site Activity:																	
<p>The key pieces of environmental legislation affecting this sector are:</p> <p><i>(Add as many as apply to your site activities – you will ensure that this list is kept up to date for your site and covers all applicable legislation)</i></p>	•								•								
	Process / Activity/Equipment	A	W	E	D	L	N	R	Process / Activity/Equipment	A	W	E	D	L	N	R	
<p>Processes / Activities / Equipment at your site: (insert H or M or L where applies)</p> <p>List all the processes / activities / equipment at your site in these columns.</p> <p>Then put an (H) high impact, or (M) medium impact, or (L) low impact in the box next to the process / activity / equipment if it can result in an environmental impact listed below under normal or abnormal operation.</p> <ul style="list-style-type: none"> ➤ Emissions to Air (including dust) - A ➤ Emissions to Water - W ➤ Energy Usage (for example, electricity, gas, oil) - E ➤ Waste Disposal - D ➤ Land Contamination - L ➤ Nuisance (i.e. noise or odour) - N ➤ Resource Consumption (for example, water, chemicals, not energy) - R 																	

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For each Process / Activity / Equipment identified in the Table 1 above complete the following tables if there is an environmental impact [at least High (H) or Medium (M)] under normal or abnormal operation (*the examples included are guidance only*)

Table 2A. Emissions to Air [A] (<i>use as many forms as required</i>)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, flue Gas Emissions from boilers raising steam – Gas / Oil Fired	Flue Gas emissions include CO2 a greenhouse gas contributing towards global warming; NOx contributes to acidification, potential for local air quality issues with dust	Yes – boiler operation	Yes - Boilers on list	Yes – Boiler operation	Yes	Boilers gas fired – operator trained and burners and dampers regularly maintained.
For example, dust from site activity A (<i>state specific activity</i>)	Potential for local air quality issues from dust. Also, a cause for complaints					
<i>Add any other that apply</i>						

Table 2A (Continued) Emissions to Air [A] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2B. Energy Usage [E] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, electricity usage for large machine / activity A (<i>state specific machine / activity</i>)	The impacts associated with electricity production are well documented (for example, air emissions) There is scope to reduce these impacts by using electricity efficiently on site.					
For example, electricity usage for large machine / activity B (<i>state specific machine / activity</i>)	The impacts associated with electricity production are well documented (for example, air emissions) There is scope to reduce these impacts by using electricity efficiently on site.					
<i>Add any other that apply</i>						

Table 2B (Continued) Energy Usage [E] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2C. Emissions to Water [W] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, oil/water separator	Oil passes through the separator into a watercourse potentially causing harm to environment	Yes – separator operation	Yes – see separate checklist	Yes – Procedure listed	Yes – November 2009	
For example, surface water run-off from buildings, car parks and concrete hard standing	Under normal conditions surface water run-off will be uncontaminated. However, if contamination occurs by accident, it has the potential to cause water pollution to local watercourse if there is a site drain failure					The accidental contamination case is considered in our Accident / Incident Management Plan
<i>Add any other that apply</i>						

Table 2C (Continued) Emissions to Water [W] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2D. Waste Disposal [D] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, hazardous Waste from activity A <i>(state specific machine / activity)</i>	Chemicals, ink jet cartridges, fluorescent tubes, waste oils, all will be handled in accordance with Hazardous Waste Legislation					
For example, general unsorted waste	Most general unsorted waste is landfilled and this has associated impacts e.g. ecotoxicity, global warming and nuisance e.g. odour. General waste volumes can be reduced if sorting systems are used. Need to meet legal Duty of Care requirements.					
<i>Add any other that apply</i>						

Table 2D (Continued) Waste Disposal [D] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2E. Nuisance (e.g. Noise, Odour) [N] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, noise from site activities (<i>state specific activity, for example, crushing</i>)	Section III of the Environmental Protection Act 1990 , noise can be classified as a statutory nuisance					
For example, noise from transport movement on site	Section III of the Environmental Protection Act 1990 , noise can be classified as a statutory nuisance					
For example, odour from site activities (<i>state specific activity</i>)	Section III of the Environmental Protection Act 1990 , odour can be classified as a statutory nuisance					
<i>Add any other that apply</i>						

Table 2E (Continued) Nuisance (e.g. Noise, Odour) [N] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2F. Resource Consumption (not energy) [R] <i>(use as many forms as required)</i>						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, use of chemicals for activity A <i>(state specific activity)</i>	Harm to human health or escape to the local environment. Management of hazardous substances according to COSHH and Hazardous Waste Regulations					
For example, use of hydraulic oil for machine A <i>(state specific machine)</i>	Harm to human health or escape to the local environment. Management of hazardous substances according to COSHH and Hazardous Waste Regulations					
For example, use of water	Inefficient use results in natural resource depletion					
<i>Add any other that apply</i>						

Table 2F (Continued) Resource Consumption (not energy) [R] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 2G. Land Contamination (e.g. storage of hazardous substances) [L] *(use as many forms as required)*

Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
For example, Storage of substance A (<i>specify specific substance</i>)	Substance A can cause harm to the ecotoxicity of the soil, and could leak into groundwater.					
<i>Add any other that apply</i>						

Table 2G (Continued) Land Contamination (e.g. storage of hazardous substances) [L] (use as many forms as required)						
Process / Activity / Equipment on Site	Potential Impact	Is impact controlled by equipment?	Is equipment included on maintenance checklist?	Is impact controlled by a procedure?	Person using the procedure received training?	Comments
<i>Add any other that apply</i>						

Table 3. General Waste Management <i>(use as many forms as required)</i>					
Waste Produced at Site <i>(with EWC, if known)</i>	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments
For example, General waste (EWC ref) sent for disposal	ABC landfill	No – Checked on 1/11/09	Yes – Checked on 1/11/09	Yes – Checked on 1/11/09	State the checks that were made and refer to any documentation

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Table 3 (Continued) General Waste Management (use as many forms as required)					
Waste Produced at Site (with EWC, if known)	Where does the waste go?	Can it go to recovery / recycling?	Is it being stored correctly on site?	Are Duty of Care requirements being met?	Comments

Table 4. List of Procedures *(list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)*

(use as many forms as required)

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments
For example, Boiler A Operation	Boiler A operation using fuel oil	Site office – control room file cabinet	2	1/11/09	Version 1 replaced as new monitoring equipment has been added to the boiler

Table 4 (Continued) - List of Procedures *(list procedures identified in Table 2A to 2G above, and any other procedures you have in addition)*
(use as many forms as required)

Procedure Name	What process / activity / equipment does it relate to?	Where is the procedure kept?	Version Number	When was the procedure last reviewed?	Comments

Table 5 Maintenance checklist

Use as many forms as required, photocopy this blank form before first use to ensure you have easily accessible copies for the future.

Item requiring maintenance	How often? (tick the appropriate box)						Where are maintenance instructions?	Who is responsible?
	Day	Week	Month	Year	2 years	5 years		

Table 6 Maintenance record

Item: inspect fences		Due: weekly
<i>Completed on</i>	<i>Completed by</i>	<i>Comments</i>
<i>For example, 27-02-09</i>	<i>A Person</i>	<i>Bund around oil tank cracked. Crack repaired and bund resealed.</i>

Table 7 Accident/incident plan

Possible Accident / Incident	What would the environment harm be?	How do we reduce the chances of it happening?	What to do if it happens
Spillages			
Spillage during transfer, sorting, crushing and compaction of wastes.	Contamination of land, drains, groundwater and watercourses.	Inspect and validate all in-coming wastes. Remove hazardous liquids from wastes prior to processing. Train the staff	Follow the spill response procedure. It describes what to do in the event of a spill and where the spill kit is kept.
Spillage during delivery of oil or fuel.		Supervise fuel deliveries. Use drip trays and spill materials.	
Spillages during refuelling of plant and equipment.		Plant and equipment will be refuelled in designated areas with impervious surface and will use drip trays and spill materials.	
Slow seepage of liquids from imported contaminated materials. Slow seepage can be less noticeable than 'spills'.		Incoming materials that are contaminated for example cutting oil or tramp fluid on swarf, will only be stored on impervious surfaces that are drained to an oil interceptor	
Overfilling			

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Possible Accident / Incident	What would the environment harm be?	How do we reduce the chances of it happening?	What to do if it happens
Overfilling of oil / fuel tanks during delivery.	Contamination of land, drains, groundwater and watercourses.	Stock level control checks, supervised delivery and high level alarms.	Spill response procedure as described above.
Failure of Plant or Equipment			
Leakages; due to faulty pipe work, valves, over-pressure, blockages, corrosion, severe weather, ground movement and so on.	Contamination of land, drains, groundwater and watercourses.	Daily visual inspection and completion of weekly inspection checklist record. Preventative maintenance regime. Any underground pipes and tanks will be tested for integrity. Insulation and protection of pipe work.	Spill response procedure as described above.
Puncture; of vessels and tanks etc due to impact – such as fork lift trucks.		Tanks and vessels generally located within / on secondary containment facilities. Storage locations of drums and non-permanent vessels protected by use of barriers or fencing. Movement of drums and containers using safe techniques.	
Fire			
Fire	Smoke and pollution, Firewater causes contamination of land, groundwater and watercourses.	Separation of incompatible materials and of combustible materials and ignition sources. Incorporation of fire breaks into site layout and containment of fire water. No smoking policy. Maintain tidy site and minimize stockpile of combustible materials.	Fire procedure describing what to do in the event of a fire, including details about fire alarms, exit routes and muster points, responsible personnel such as a fire warden and the location and use of emergency fire equipment such as extinguishers, hoses, sand bags and drain covers.

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Possible Accident / Incident	What would the environment harm be?	How do we reduce the chances of it happening?	What to do if it happens
		Fire training and emergency drills.	
Cross contamination			
Due to transfer and mixing of incompatible materials, drainage cross connections and so on.	Explosion, smoke and pollution of air, Contamination of land, drains, groundwater and watercourses.	Maintenance of up to date drainage plan. Maintenance of inventory of substances with material property details. Procedure for contractors to work on site including induction training and permit to work. Fail-safe filling systems.	Fire procedure as described above.
Flood			
Due to ingress of watercourse floodwater, blocked drains, burst water main, use of fire water.	Contamination of raw materials, buildings, land, drainage system, groundwater and watercourses with fire and flood water.	Maintenance of drains. Fitting of flap / non return valves on drains. Safe location for storage of hazardous materials.	Flood procedure describing what to do in the event of a flood warning such as installation of barge boards, use of sand bags, movement or protection of sensitive materials.
Failure of Services			
Due to failure of supply; water, electricity, gas supply and of sewerage system. Due to utility supply being struck and broken / cut.	Flooding, explosion with subsequent contamination of land, drains, groundwater and watercourses.	Provision of standby facilities. Maintenance of up to date plans showing location of utility services. Procedure for contractors to work on site including induction training and permit to work.	Utility supply failure procedure describing what to do in the event of services supply failure such as manual shut down of process valves; start up of emergency generator, use of standby materials etc. Flood and fire procedure as described above.
Failure of Containment			
Failure of containment facilities due to land movement, impact, corrosion and so on.	Contamination of land, drains, groundwater and watercourses.	Provision of secondary containment for hazardous liquids. Inspection of primary and secondary containment facilities. Integrity testing of tanks and bunds & pressure loss alarms.	Spill response procedure as described above.

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Possible Accident / Incident	What would the environment harm be?	How do we reduce the chances of it happening?	What to do if it happens
Vandalism			
Unauthorised entry and tampering or malicious damage to property, plant and equipment.	Contamination of land, drains, groundwater and watercourses.	Secure gate and perimeter fence. Site locked when un-manned, tanks and valves locked when not in use out of hours. Plant and equipment locked in secure storage out of hours. Security system installed including camera and recording facilities.	Spill response procedure as described above.

Table 8 Accident and incident record

Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A Incident number:
Please print your name and sign	

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Table 9 Record of non-conformances

Date and time non-conformance identified	
What happened, what was it about and what permit condition does it relate to?	
What caused it?	
What have you done to make sure that it does not happen again?	
Have you reviewed the EMS and rolled out any changes to operations and procedures? Include dates.	
Was there any significant pollution – for example: oil entering a surface water drain. If so what?	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable Time: Date: E.A. Incident number:
Please print your name and sign	

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Table 10 Complaints record

Who made the complaint? Name:	
Address	
Phone No	
Date and time they made the complaint	
What happened, what was it about?	
Was anyone else aware of this – other neighbours or your staff? If so who?	
Assuming the complaint relates to your site, what was the problem, what went wrong? If you can't find the source of the problem you will contact a suitably qualified person to do so and record who they were and what the problem was.	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example: excessive odour which can be smelt off site or spillage of untreated sewage onto the ground into a drain or a watercourse? If so the Environment Agency will be informed.	
If there was then you must notify the Environment Agency on 0800 807060 ASAP. Have you done so?	Yes/No/not applicable At what time did you phone?
You must also write or send an email to confirm this to the local office (see your accident management plan for the address). Have you done so?	Yes/No/not applicable Time: Date: EA incident number:
Please print your name and sign:	

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Table 11 Staff responsibilities

Name	Role	Part of permit responsible for	Any other legislative responsibilities	Required training received?

Table 12 Training checklist

Use as many of these forms as required

(the examples included may or may not be applicable for your site – amend as appropriate)

JOB	TRAINING REQUIRED (tick boxes to show who needs which training)														COMMENTS		
	Environmental awareness							Maintenance/operations					Accidents and emergency				
	Certificate of Technical Competence	Supervision of waste management sites	Environmental and permit awareness	Waste receipt inc Duty of Care	Waste separation and storage	Awareness of local sensitive sites for example sites of special scientific interest		Maintenance of mechanical grab	Maintenance of separation conveyor	add skills appropriate to your site				Fire procedure		Spill response procedure	Flood procedure (where applicable)
Site Manager																	
Site Supervisor	√	√		√		√		√					√	√	√	√	
Site operator A			√		√	√		√									
Site operator B																	
Contractor 1																	

Other jobs e.g. Operator A (Grab), Operator B (Separator), Operator C (Trainee), Contractor 1(Maintenance).

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Table 13 Training record

Employee Name	Job Title
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Training Required	Date due	Date done	Passed as competent? yes/no	Reviewers Signature	Date for Refresher	Comments

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Table 14 Delegation of responsibilities

Name of employee to be absent	
Job title/role to be filled during absence	
Department	
Absence type e.g. maternity leave.	
Name of employee covering absences role	
Parts of permit employee is responsible for	
Any other responsibilities the employee will be covering.	
Length of time cover will be for.	
Any training required to enable employee to cover the role effectively and competently.	

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Table 15 Register of legislation and other obligations

Legislation/code of practice	Applicable to which process/product	Where is a copy held?	Person responsible for compliance

