

**CDTS North and West
Limited**

Environmental Policy

Alport Farm

Malpas

Cheshire

SY14 7DG

Manual Circulation

Registration No.	Position/Department
1. "C"	Main Office
2.	
3.	
4.	

Key "C" = **Controlled**
"U/C" = **Uncontrolled**

Issue 1 Revision 1

Date: 4th September 2017

Amendment Record

No	Amendment	Date	Name
1	Replace Special Waste Regulations 1996 with Hazardous Waste Regulations 2005 as amended	1 st July 2014	Iain Christison P Stephenson
2	Replace Environmental Protection (Duty of Care) Regulations 1991 with Waste Regulations 2011	1 st July 2014	Iain Christison P Stephenson
3	Controlled Waste (Registration of Carriers) and Seizure of Vehicles Regulations 1991, with Waste Regulations 2011	1 st July 2014	Iain Christison P Stephenson
4	Annual Review	6th April 2015	Iain Christison P Stephenson
5	Annual Review & Change of HSE Advisor	04 th September 2018	Iain Christison C Pitchers
6	Annual Review	September 2019	Iain Christison C Pitchers
7	Annual Review	September 2020	Iain Christison C Pitchers
8	Annual Review	4 September 2020	Iain Christison C Pitchers
9	Annual Review	September 2022	Iain Christison C Pitchers
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Cambridge Direct Tree Seeding Limited Environmental Policy

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Issue 1 Revision 1

Date: 4th September 2017

Arrangements for Implementation

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SECTION 1

FOREWORD

Foreword

Cambridge Direct Tree Seeding Limited , recognises its responsibilities under the Environmental Protection Act 1990 and The Waste Regulations 2011 to provide a statement of policy along with the necessary arrangements to ensure it is effectively communicated, audited and kept under review.

This Manual, which contains the Policy Statement, Responsibilities and Arrangements form the basis for ensuring that the Company work within the statutory duties set out in both the Acts and any subsequent Regulations.

It will be explained to all Employees during induction training when they join the Company.

The Environmental Policy Statement will be displayed on notice boards near all places of work, and a copy of the complete Manual will be available at all static locations.

The Managing Director will review the Manual annually in January. It will be amended whenever new legislation or codes of practice are introduced which could affect our systems of work. All amendments will be distributed to and fully explained to all employees.

SECTION 2

POLICY STATEMENT

Environmental Policy Statement

We as a Company recognise that our activities have far ranging implications on the environment, in both the short and the long term. These can, potentially, be either damaging or beneficial.

AIM

We aim to be the most environmentally aware landscaping company and to encourage "Best Practice" at all times.

OBJECTIVE

Our objective is to become one of the industry leaders in environmental protection.

To achieve this objective the company will:-

- a) Aim to minimise the environmental damage and maximise our opportunities for environmental enhancement.
- b) Assess and consider the impact on the environment as an important part of its decision making process.
- c) Comply with the legal requirements and establish targets to achieve a progressive reduction on the impact to the environment, in all parts of its operations
- d) Promote personal responsibility and effort on the part of our employees at all levels, to prevent and avoid damage to the environment. Also to act as good neighbours to those affected by our activities
- e) Provide the training, assistance and information as may be necessary to personnel at all levels, and audit environmental performance.
- f) Provide and display this policy and such written instructions as are necessary to assist in the implementation of our Environmental Policy

Signed: James Thomson

Date: **4 September 2022**

James Thomson

Position: Managing Director

SECTION 3

RESPONSIBILITIES

Duties & Responsibilities

Managing Director.

The managing director Mr James Thomson is responsible for ensuring that Environment issues are given equal priority with Health and Safety and other vital company activities at director level.

He is responsible for:

- Ensuring environmental issues are given due regard at tender stage and that such issues are identified so that an effective control strategy can be developed.
- Ensuring that staff and contractors at all levels receive appropriate training to enable them to understand environmental issues and the important role they play in minimising environmental impact.
- Monitoring environmental performance through site meetings and discussions.
- Responding to actual site conditions observed when on routine site inspections.
- When holding meetings with employees and other people, ensure environmental issues are discussed and receive comments and suggestions on ways in which the Company's performance can be improved.
- Setting a good personal example and having adequate knowledge of health, safety environmental legislation relating to your aspect of the Company's work.
- Ensuring all plant sent to site is safe, in accordance with the manufacturer's specifications, and when applicable has been tested and thoroughly examined in accordance with current EC & UK environmental regulations.
- Ensuring that new and existing plant and equipment meets UK and EC requirements, especially with regards to guarding, noise levels and emissions.
- Arranging for regular servicing and maintenance of all plant and that adequate records are maintained.
- Ensuring that any item of plant reported as being defective is taken out of serviced until repaired/checked.
- Ensuring that any waste from the plant and vehicle workshop is correctly handled and recycled where possible.
- Ensuring that waste disposal is done in accordance with current requirements.

Health, Safety and Environment Advisor

In addition to his general duties the HS&E advisor will be responsible for:

- Providing a statement on any health, safety or environment issues on request from a client or other recognised authority.
- Organising and attending regular meetings with the Managing Director to review performances set objectives and receive feedback on environmental issues.
- Informing the Managing Director of any major environmental issues impacting or likely to impact on the company.
- Ensuring that there is adequate environmental advice and awareness at all levels of the Company.
- Ensuring all employees are made aware of the Company's Policy and that they receive adequate training to enable them to contribute to minimising the Company's impact on the environment.

Contracts/Office Manager

Office Manager is responsible for:-

- Understanding the Company's health, safety & environmental policy and ensuring that it is brought to the attention of all employees, particularly new employees and temporary employees, through induction talks.
- Having adequate knowledge of environmental requirements and practices as they relate to their work and that of the office.
- Assisting and encouraging staff to be more environmentally aware in the everyday workings of the office.
- Ensuring that any environmental incident is reported in accordance with Company policy.

Contracts Supervisors

The Contracts Supervisors are responsible for:-

- Understanding the Company Environmental Policy and ensuring that it is brought to the attention of all employees, particularly new starters, through induction talks.
- Having adequate knowledge of legal requirements and good working practices.

- Ensuring that all necessary registers and records are maintained and that persons under their control are adequately trained to enable them to understand their role in environmental issues.
- Ensuring that the necessary environmental risk assessments have been carried out and recorded.
- Bringing the main findings of these assessments to the attention of the site staff along with the health & safety risk assessments.
- Ensuring that adequate arrangements are made with regards to waste procedures to minimise waste and to ensure it is correctly classified and handled.
- Planning the site layout and work with due regard to environmental issues as identified in the assessment.
- Ensuring any environmental incident is reported in accordance with Company policy.

Office staff and Site operatives

Office staff and site operatives are responsible for:

- Co-operating with management in following company procedures.
- Contributing ideas and feedback on environmental matters to the Managing Director.

SECTION 4

ARRANGEMENTS

4.1 Implementation

For all permanent locations, the company will carry out an environmental impact assessment (**EP Form 001 & 002**) of the site and produce an action plan covering what changes can be made to minimise any adverse effects.

For all temporary and short term locations, environmental issues will be considered equally with quality and health & safety issues at the planning stage. The environmental impact assessment (**EP Form 003**) will be incorporated into the project Health, Safety & Environmental plan and agreed with the client before work commences.

The environmental performance of the company will be monitored by Guthrie and Craig (Management Services) Ltd and be reviewed annually with the Managing Director. Long and short-term objectives will be set and be monitored and reviewed to ensure the company achieves those objectives.

The review will take into account any changes in legislation, advances in technological knowledge and changes in industrial practice and amend the company's objectives if necessary.

The company is aware of ISO 14001 and will strive to meet the standards in it.

4.2 Training

Cambridge Direct Tree Seeding Limited . is committed to staff development and training including environmental issues. We are aware that staff must understand the basic issues before they can contribute to changing procedures and improving performance. Therefore environmental issues will be included in the Company Induction and refresher training. The Managing Director and Safety Advisor will review staff training needs on an annual basis and environmental issues will be a part of this review process.

4.3 New Contracts Procedures

Under the Construction (Design & Management) Regulations, when the Company undertakes the role of Principal Contractor for a project a Health & Safety plan has to be produced which identifies the significant hazards and what controls the Company intends to impose to eliminate or minimise the risks involved.

Hazard identification will be extended to include environmental issues. The Managing Director will review the potential environmental impact of the project on both the natural and built environments. Works will be planned to minimise the impact on both sectors.

On projects where the Company has a design role or input into the design and selection of materials, environmental concerns will be taken into consideration when selecting material and equipment.

4.4 Environmental Incident and Report Procedures

Definition of an Environmental Incident

There are no legal definitions of environmental incidents and so the Company has adopted the following definitions and categories:-

Emissions to the atmosphere

Methane leakage or loss	More than one tonne or where widespread complaints are received
Ozone depleting substances	Greater than 100 kg.
Odours	Any complaints
Any toxic gas	Any unplanned release
Dust, smoke and aerosols	Any complaints
Breach of emission limits	All occurrences

Emissions to land

Spillages of hydrocarbons	50 litres or more
Pesticides and herbicides	Any uncontrolled or accidental spillage run Off or spray drift
Contaminated or polluted water	500 litres or more
Chemicals	Any uncontrolled or accidental spillage
Unauthorised deposit of waste	Any occurrence
Breach of Duty of Care	Any occurrence

Discharges to water

Breach of any consented discharge limit	Any occurrence
Unauthorised discharge or depositing of solids or liquids into water (i.e demolition waste falling into water, contaminated liquids or ground water being pumped to rivers or streams etc.)	Any occurrence
Any unauthorised or deliberate act of vandalism which resulted in substances used or stored on site causing damage to a watercourse.	Any occurrence
Breach of any EA pollution incident categories. See below for details.	Any occurrence

EA Defined Categories

The EA have three categories of pollution incidents to water:-

Category 1

A 'major' incident involving one or more of the following:-

- Potential or actual persistent effect on water quality or aquatic life.
- Closure of potable water, industrial or agricultural abstraction necessary.
- Extensive fish kill.
- Excessive breaches of consent conditions.
- Extensive remedial measures necessary.
- Major effect upon amenity value.

Category 2

A 'significant' pollution incident which involves one or more of the following:

- Notification of abstractors necessary.
- A significant fish kill
- Measurable effect on invertebrate life.
- Water unfit for stock
- Bed of watercourse contaminated
- Amenity value to the public, owners or users reduced by odour or appearance.

Category 3

'Minor' suspected or probable pollution which, on investigation proves unlikely to be capable of substantiation or to have no notable effect.

Noise

Breach of any regulatory limit or limits set by planning consent	Any occurrence
Any complaints of noise due to our-of-hours activities	Any occurrence

Damage to amenity or cultural heritage.

Reports will be required on any complaints arising from a reduction in the aesthetic amenity or public enjoyment value of areas such as:-

- National parks or national trails.
- County parks and other forms of recreational areas.
- Local authority and private recreational areas.
- Damage of near miss situations involving a listed building, public monument, conservation area or other building of archaeological importance.

Reporting Procedure

The Senior Contracts Manager or Commercial Manager should complete the environmental incident report (**EP Form 004**) and submit it to the Managing Director as soon as possible and at least within 24 hours of the incident occurring.

4.5 Working Procedures

Dust

During dry conditions, dust can be both a nuisance as well as an environmental problem. Precautions such as enforcing strict speed limits for vehicles, and in extreme conditions, using water dousing will help to minimise the problem.

Fuels, Oils and Other Fluids Stored or Used on Site

The position of the storage area should take into consideration, the environmental factors surrounding the site. If there are watercourses or open drains, tanks should be positioned as far away as possible to minimise any effects of an accidental spillage.

Diesel and fuel tanks are to be bunded. The bund is to be capable of holding 110% of the largest tank capacity. The bund is to be fitted with a drain valve to allow rainwater to be drained away. This drain valve will normally be locked shut.

As an alternative, a purpose designed double-skinned storage tank can be used.

All discharge hoses are to be kept in good condition and inspected weekly by the site Lead Installer. The discharge nozzle should have a holding bracket positioned at a height to eliminate small spillages after plant and vehicles have been re-fuelled. The discharge line should have an isolating valve positioned as close as possible to the tank and this discharge valve should be locked closed whenever the tank is unattended.

If possible, a hard standing should be provided for the re-fuelling area. When re-fuelling static plant and equipment, absorbent mats or granules should be available to deal with any spillage and drip trays should be used under such plant. Fuel being transported or carried around the site should be in purpose -designed bowsters or carrying containers.

Consideration will have to be given to the health & safety aspects of oils and fuels in addition to the environmental aspects. If it is safe to do so, they should be stored in a secure container where they are protected from vandalism and any spillages contained. With some substances, it is essential that they are stored in open, well ventilated areas in which case bunding or other impermeable layer is placed under the storage area.

Fume Emissions

The Plant Manager will ensure that plant sent to site is in good condition and filled with the correct grade of fuel and lubricants. It is important that Contract Managers' ensure daily checks are carried out and that the correct grade of fuel is used in the plant. The Plant Manager will arrange for routine servicing to be carried out. If the plant's performance starts to deteriorate, and exhaust fumes and smoke are clearly visible, the Contract Manager should stop the plant and arrange for corrective action to be taken.

Noise Emissions

Plant should be selected with noise levels in mind. If the plant has to be left running overnight, it is important that **quiet plant or silence plant** is used.

The Contracts Manager is to take into consideration the noise levels of plant and equipment when purchasing/hiring plant. It is important that any acoustic covers or panels are kept in position when the plant is being operated.

If operations involving high noise levels have to take place, work is to be limited to the times which will have least impact on the neighbourhood and people in the near vicinity. Noisy operations should be suspended at times such as morning breaks and lunch break periods.

Light Pollution

In some locations, light pollution from site lighting left on overnight can be a problem. Contract Manager's should be aware of this potential nuisance factor when planning sites. Consideration should be given to neighbouring properties when positioning security and flood lights.

Management of Top Soil and Sub-Soil

The Contract Manager will take into consideration the need to segregate stripped top soil from sub-soil and from other material. If the top soil is to be stored for a considerable period of time, intermediate action may be need to keep the top soil in good condition.

Hedges and Trees

In general terms, all hedges and trees (and their roots) should be protected (if necessary, by fixed fencing) to ensure plant and site operations do not cause damage.

Wildlife Habitats

The contract documentation will generally identify any special wildlife habitats and the precautions that the Company has to take. If a previously unknown wildlife habitat is found, this should be identified to the client and a course of action agreed.

Waste Water and Ground Water

Waste waters from canteen facilities must be discharged to a normal main sewer system or to a storage tank for removal by septic tank service.

Ground water that forms in excavations could be classed as contaminated. The contamination could be due to substances leaching out of the surrounding soils or it could merely be due to suspended solids. If this type of water was to be discharged into an open water course, it could result in fish losses and damage to that water course ecology. Contract Manager's should take this into consideration when pumping out excavations and generally planning the site.

All discharges of water into water courses shall be subject to Environment Agency or Local Authority Approvals. These approvals may have conditions relating to suspended solids and rate of discharge to avoid bank erosion and scouring.

Waste Management

It is the responsibility of the Contracts/Office Manager to try and eliminate waste by better use of resources and by re-using items before resorting to disposal. Recycling of waste, such as waste paper, is preferable to simple disposal.

The Contract/Office Manager is responsible for waste disposal and should try to recycle or re-use substances as opposed to simple disposal.

It is the Contract Manager's responsibility to develop a waste management plan for the project, taking into consideration the type and quantities of waste that are likely to be produced. If special waste will be produced, Waste Removal Contractors should be vetted to ensure that they have the necessary registration and approvals for handling such waste.

With regards to consignment notes, please see the section on Duty of Care for further details.

Work On or Near Water Courses

A method statement will be required detailing the scope of work and the precautions that have to be taken to minimise risk to health, safety and environmental damage for work taking place on or near water.

The method statement should also give details of emergency or out-of-hours arrangements so that someone from the site can be contacted should an emergency situation develop. Specific instructions on the action to be taken to minimise the environmental impact should be available should an incident occur.

4.6 The Waste Regulations 2011

Anyone who “imports, produces, carries, keeps, treats or disposes of any controlled waste, or a broker who has control of such waste” is subject to the Duty of Care. Controlled waste is defined as any household, commercial or industrial waste, including building and demolition waste, therefore any waste that leaves site is defined as controlled waste and must only be moved after a transfer note has been issued.

The Duty of Care

The duty of care is described in Waste Regulations 2011, which states that all those subject to the Duty of Care must:

- Prevent others from depositing, storing, treating or otherwise disposing of waste without a valid licence or contravene the licence conditions; or act in a manner likely to cause environmental pollution or harm to human health.
- Prevent the waste from escaping.
- Ensure that waste is only transferred to an authorised person
- Include with the waste transfer a written description sufficient to enable others to comply with the duty and avoid committing an offence. A compulsory transfer note system was introduced by the Waste Regulations 2011.

Definitions

Waste Producer – The starting point for deciding who is the waste producer is to decide how the material became waste. A material may become waste by being changed in some way, for example demolition waste, in which case the waste producer is the person carrying out the change. Alternatively waste can be created by a decision of change of attitude, for example, the decision that material is surplus or unwanted, in which case the waste producer will be the person in possession of the object or substance who makes the decision that it is waste.

Waste Manager – A person who keeps, treats or disposes of controlled waste.

Waste Broker – A person who arranges the transfer of waste which he does not himself control what happens to it.

Waste Carrier – A person who transports waste. The company should be registered with a waste regulation authority and have a licence to confirm this registration.

Duties of a Waste Producer

A waste producer is responsible for providing an accurate description of the waste. This should include:

- The type of premises or business from which the waste is generated
- The process that produces the waste and the quantity of waste.
- The name of substances which comprise the waste including a physical and chemical analysis, if applicable
- The care of the waste whilst they hold it.
- The packaging of the waste to prevent its escaping during transfer.
- Using a registered (or exempt) carrier to transport the waste.
- The final disposal of the waste depending on the degree of involvement in the selection of the waste carrier, manager or broker.

The waste manager should report suspicious circumstances which may indicate a breach of the duty in the disposal chain to the Waste Regulations Authority.

Duties of a Waste Carrier

The Waste Carrier is responsible for:-

- The adequacy of packaging and security of the waste whilst under his control
- Ensuring that a description accompanies the waste and that this description is accurate.
- Ensuring that any alteration to the waste is recorded in the description of the waste.

Any requests for contract vehicles to transport waste must be made to the sire of contracts manager who should ENSURE the contractor is registered for the transport of waste. Waste carriers are subject to the Waste Regulations 2011.

Duties of the Waste Broker

The Waste Broker is responsible for ensuring that the waste is correctly and adequately described and is transferred by a registered (or exempt) carrier and that all documentation is properly completed.

Duties of the Contract Manager

The Contract Manager is responsible for:-

- Carrying out the disposal operation in accordance with the conditions of the Waste Regulation Authority Licence.
- Checking the description of the waste they receive. Sample checks on the composition are considered to be “good practice” and should be implemented.
- Ensuring that correctly completed documentation accompanies the waste.

Duty Holders

All duty holders should look out for breaches of the duty committed by others in the chain. Breaches of the duty should be reported to the Waste Regulation Authority and further dealings with the offenders should be considered.

Waste Transfer Notes & Consignment Notes

A waste transfer note or a special waste consignment note must be used before any waste is transported off site.

Completion of Site

On completion of the site, all **Waste Transfer Notes** and **Special Waste Consignment Notes** should be archived with the contract papers and retained:-

- For a period of 2 years in the case of transfer notes.
- For a period of 3 years in the case of special waste consignment notes.

Copies of the waste transfer notes should also be included in the health & safety file and handed to the client via the planning supervisor.

EP Form 003

Site Specific Environmental Assessment

Job Number:

Site:

Date of Survey:

	Question	Y	N	NA	Comments & Actions / Controls.
Permissions and Consents	Permissions or consents required ?				
	Does TPO / Preservation apply ? If YES consent MUST have been gained and recorded				
Waste	What form will the timber be produced as waste and what will we do with it?				Leave on site
	As felled				
	Large Logs				Leave on site / Return to Yard (large log bay)
	Small Logs				Leave on site / Return to Yard (small log bay)
	Branches and twigs				Chip / Leave on site / Return to Yard
	Will any other green waste / vegetation be produced ?				Chip / Leave on site / Return to Yard
Noise & Nuisance	Will dust be produced by operations ?				
	Will there be nuisance from noise that will affect the public / residents ?				No longer than continuous
	Will there be nuisance from any plant exhaust / chippings emission?				
	Is temporary lighting to be used?				
	Will temporary lighting be of nuisance to local residents ?				
Water Discharge Potential of Risk	River / Streams – is it close proximity to work area with a danger of anything entering?				
	Is there possibility of chemical (from the application for preventing re-growth) entering water courses ?				
	Land Drains – is potential for anything entering ?				
	Is there potential for interference with underground drain ?				
Storage	Is suitable / and or secure area for all storage on site (equipment, materials, waste) ?				
	Will plant / equipment be required to be left overnight?				
	Is there any waste that will need to be left overnight on site?				
Electricity	Are there any overhead or buried services that could cause a problem ?				
Contaminated Land	Are there signs of contaminated land around work area or access / egress ?				
	Can suitable area for refuelling of equipment be made?.				
Local Issues & Planning Risk	Is there safe access / egress?				
	Is terrain suitable for vehicle / plant?				
	Could there be impact to surrounding buildings or parked vehicles when conducting felling / chipping?				
	Have any buildings close to works got asbestos roof or guttering that could be breached if accident when felling ?				
	Are there any known protected birds / animals / flora / fauna in working area?				
	Are there any potential risks from vegetation to operators / public ?				
	Does specific traffic controls or restricted parking need to be in place ?				
	Is there possibility of disturbance to archaeology ?				
Are there emergency plans in place for potential risks?					

Environmental Incident / Accident / Near Miss Report Form

Guidance for completing this form:

Part A is to be completed by the person reporting the event. Please use **BLOCK CAPITALS**.

Send the original form to the Managing Director, retaining a copy for your own records.

PART A

1. Name of person reporting: _____

3. Were you directly involved in the event? YES / NO

4. If so, in what capacity? _____

5. Date of event: _____

6. Time of event: _____

7. Location of the event:

8. Was the event an: **ACCIDENT / INCIDENT / NEAR MISS** (Please circle as appropriate)

9. What was the nature of the risk? (**Please indicate with an X**)

- Fire
- Explosion
- Spillage, leakage or uncontrolled discharge of substances
(Other than special, hazardous or restricted substances)
- Spillage of special, hazardous or restricted substances (e.g. oil, detergent, paint)
- Emission to air of gas, dust, fumes or other pollutants
- Pollution of water courses, surface water drains, foul water sewers
- Contamination of land, flora, fauna
- Damage to archaeology, listed building, local heritage etc
- Noise, litter, light, odour, vibration or other nuisance
- Human Health and Safety
- Other risk (please describe below)

10. Further details on the nature of the risk.

(E.g. Describe the potential or actual impact on the environment or local features; is any waterway at risk and how near is it; what volume of substance was discharged; what was the hazardousness of the substances involved.)

11. Describe what happened.

(Give as much detail as possible, e.g. the name of any substance involved; what happened leading up to the event; the part played by any people including third parties; the names of any witnesses; any action taken at the time of the event.

Signature of person completing form:

Date of Completion of form:

PART B

(For Completion By Managing Director)

Preventative or corrective action identified and agreed:

Action to be taken.

By who.

Deadline for implementation.

Signature of person responsible for action plan:

Position:

Date of implementation