ENVIRONMENTAL POLICY



MAY 2018

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1 INTRODUCTION

The overall purpose of this Environmental Management Plan is to ensure all activities are conducted in an agreed and controlled way through a clearly defined environmental framework for the establishment, management, control and maintenance of Trainor Stone & Tile work related activities.

This Environmental Management Plan is a controlled document. Hard copies are therefore treated as uncontrolled.

2 ENVIRONMENTAL POLICY STATEMENT

We recognise that our activities have an impact on the environment. We are committed to protecting the environment and will strive to achieve continual environmental improvement and prevent pollution. Through the implementation of an Environmental Management System we will work to:

- Ensure that we are fully compliant with all applicable environmental legislation and other requirements
- Develop objectives and targets and action plans to help us improve our environmental performance
- Assess the environmental risks of our activities and prevent pollution from our activities.
- Increase the environmental awareness of our staff through training and instruction.
- Monitor and check our environmental performance on an on-going basis and work to continually improve it.

This policy will be reviewed annually and communicated to all interested parties as required.

Peter Trainor- Managing Director

01/05/2018

3 LEGAL REGISTER

Having a current Legal Register ensures that Trainor Stone & Tile is up to date with its legal requirements and is reviewed annually.

4 TARGETS AND OBJECTIVES

Environmental objectives are the overall aims that Trainor Stone & Tile sets itself to improve environmental performance through our environmental management system (EMS). They indicate our business aims regarding particular issues. Environmental targets provide short-term goals on the way to achieving these overall objectives. One objective may have several targets. Our Objectives and Targets are set annually by the Managing Director and Contracts Director and reviewed periodically during the year.

5 MANAGEMENT STRUCTURE

See Section 2 of the Construction Phase Health and Safety Plan.

6 ROLES AND RESPONSIBILITIES

Managing Director/Contracts	Provide resource for staffing and site		
Directors	Policy strategy		
	Policy development		
	Legislative compliance		
	Visible felt leadership		
	Management Review		
	Reduce, reuse and recycle		
Contracts Managers	Site waste management plans Visible felt leadership		
	Risk Assessment		
	Energy compliance		

	Water compliance
	Waste compliance
C'I M	
Site Managers	Monitoring Site waste management plans
	Visible felt leadership through daily walkabouts
	Risk Assessment
	Energy compliance
	Water compliance
	Waste compliance
	Noise and dust
	Ensure waste dockets are forwarded to Buying Department
Department Managers	Reduce, reuse and recycle
H&S Manager	Workplace audits and inspections Development of the EMS
	Policies and procedures
	Monitoring legislation compliance Policy development
	Completion of Aspects and Impacts Register
	Waste statistical information Reduce, reuse and recycle
Buying Department	Obtain bids to realise maximum value in the purchase of materials and services.
	Coordinate the purchase of materials and services for all functions.
	Provide value added services by constantly striving to find new and better products and sources of supply
	Maintaining liaisons with suppliers

Assisting in locating substitute materials

Protect the Company against unfair or unethical trade practices and unrealistic or exorbitant price increases

Expediting when requested and warranted the delivery of goods and services

Collate waste statistical information

7 SUSTAINABILITY & RECYCLING

Trainor Stone & Tiling Limited needs to be aware of the impact of all its activities on the environment and on communities. This Policy sets out our approach to managing and mitigating such impacts. The Company's activities impact on the environment and communities through its

- Supply chains' employment conditions
- Direct and indirect use of non-renewable carbon fuels in its buildings and for passenger and freight transport via road and air
- Use of scarce/non-renewable raw materials in the supply chains of the items it purchases
- Use of harmful materials or high energy consuming processes in the production of the items it purchases
- Disposal of waste products
- Relationships with local communities where activities take place
- Welfare of staff, visitors, neighbours and other stakeholders.

We will follow the principles of Reduce, Reuse, Repair and Recycle in managing its environmental impact. Using the 4Rs will not only minimise environmental impacts, it also makes sound economic sense. We will comply with all relevant legislation.

8 SUPPLY CHAIN EMPLOYMENY CONDITIONS

Trainor Stone & Tiling Limited will use the tools within its Environmental Purchasing Policy to monitor and influence supply chain employment conditions. We will take reasonable steps to assess suppliers' policies and practices and will not purchase goods or services from a supplier if supply chain employment conditions are found to be or suspected to be unacceptable.

9 USE OF ENERGY AT PREMISES

Trainor Stone & Tiling Limited seeks to reduce the amount of energy used within its premises. Our

largest energy stream in the UK is electricity used for lighting and computers. We actively encourage staff participation with simple measures such as switching lights and equipment off when not needed which can have significant impact on energy use. An Energy survey has been carried out on our Head Office and a plan put in place to implement cost effective energy efficiency improvements.

Excerpt from Trainor Stone & Tiling Energy Policy

"Trainor Stone & Tiling Limited is committed to buying and using energy in the most cost-effective, efficient and environmentally responsible way possible.

To achieve this we will:

- Improve energy efficiency continuously by implementing effective energy management programs that support all operations and customer satisfaction while providing a safe and comfortable work environment
- Become one of the most energy-efficient organisations in our industry
- Benchmark energy use of all facilities
- Raise awareness to all of our employees so that they may gain an understanding of the Company's energy performance and targets"

10 TRANSPORT

By raising staff awareness of emissions caused by air travel, restricting travel to necessity trips only and using alternatives such as video/ telephone conferencing, Trainor Stone and Tile Limited can make savings in CO₂ emissions and money.

Trainor Stone & Tile has to manage the impact of business and commuter travel when considering road transport. By restricting car travel to necessity trips only and using alternatives such as video/telephone conferencing or public transport (bus/train) Trainor Stone & Tile Limited can make savings in CO₂ emissions and money. We will cost effectively manage its vehicle fleet to achieve lower emissions.

Excerpt from the Green Travel Policy

"Trainor Stone & Tile Limited is committed to implementing travel arrangements that are necessary, cost effective and time managed. To achieve this we will consider:

- Car-sharing where employees are planning to visit the same locations within a similar timescale
- Using public transport where available and practical
- Whether the journey is even necessary. Can the objectives be achieved by e-mail, telephone, tele-conferencing or video-conferencing? Remember, every journey avoided helps the Authority to reduce its carbon footprint.
- Planning flight and boat journey's well in advance of date of travel so that cancellations may

be avoided / used by others".

11 PROCUREMENT AND USE OF MATERIALS

Trainor Stone & Tile Limited specifiers and purchasers will, where practical, investigate the materials and processes used to manufacture products. Where uses of scarce/non-renewable raw materials, harmful materials or high-energy consuming processes are evident they will refrain from purchasing those products wherever possible. If no cost effective alternatives can be found the Reduce, Reuse, Repair, Recycle principles will be used. Materials to be avoided include timber from non-managed forests, asbestos, VOCs and PVC. Trainor Stone & Tile Limited will discourage suppliers from using excess packaging.

Procurement Policy

The goal of this policy is to ensure that products and services purchased or contracted conform with the goals of our company's environmental policy. We will strive, where feasible, to purchase environmentally preferable products and services to meet the company's office and operational needs.

Wherever possible, purchasing decisions shall favour:

- Products that are from sustainable source
- Products that reduce greenhouse gas emissions or are made with renewable energy
- Products that reduce the use of toxins hazardous to the environment and employee and public health
- Products that contain the highest possible percentage of postconsumer recycled content
- Products that reduce air and water pollution
- Products that reduce waste
- Suppliers who provide environmentally preferable products, and who can document the supply-chain impacts of their efforts
- Reusable products
- Products that serve several functions (e.g., copier/printers) and reduce the overall number of products purchased
- Environmentally preferable products and services that are comparable in quality and price to
 their standard counterparts should receive a purchasing preference. In situations where the
 most environmentally preferable product is unavailable or impractical, secondary
 considerations should include production methods and the environmentally and socially
 responsible management practices of suppliers and producers.

The purchase of environmentally preferable products is part of our long-term commitment to the

environment.

12 DISPOSAL OF WASTE AND RECYCLING

Trainor Stone & Tiling Limited will only use licensed and appropriate organisations to dispose of its waste and encourage the Reuse & Repair of products to avoid early disposal. Trainor Stone & Tile Limited will encourage the segregation of waste and its disposal via recycling processes. Trainor Stone & Tile specifiers and purchasers will where practical give preference to products that can be disassembled and recycled.







Site Recycling Point

Due to the nature and quantity of the waste generated on most sites, Trainor Stone & Tile appointed waste license providers segregates the waste at their depot and provides a breakdown of the quantities recycled and landfilled.

There may be times whereby due to the complexity and size of projects, Trainor Stone & Tiling shall implement a recycling strategy mirroring on the Head Office Recycling structure noted above.

Re-using Left-over Materials

In some cases there are materials which may have been unused, over-ordered etc. These items are either returned to the supplier for refund or stored in our Yard until such times as they can be re-used etc.







The following chart details the type, Hazardous/ Non Hazardous, Source, Storage and Final Destination of waste generated by Trainor Stone & Tiling.

Material	Type Non / Hazardous	Source	Storage	Final Destination
Paper	Non	Office/Site	Bins/Skip	Re-used/Recycle
Cardboard	Non	Office/Site	Skip	Re-used/Recycle
General Waste	Non	Office/Site	Skip	Re-used/Recycle
Plastic/Glass Bottles	Non	Office/Site	Skip	Re-used/Recycle
LEV Wood Dust	Non	Site	Skip	Recovery
Scrap Wood Pieces	Non	Site	Skip	Re-used/Recycle
Scrap Metal	Non	Site	Skip	Re-used/Recycle
Used Oils	Hazardous	Site		Licensed Carrier
Batteries	Hazardous	Site		Licensed Carrier
Washdown	Non	N/A	N/A	N/A
Tools	Non	Office/Site	Skip	Landfill
Equipment	Non	Office/Site	Skip	Landfill
Toner Cartridges	Non	Office	Recycled	
Gas Bottles / LPG	Non	Site/Yard	Supplier Return	
Asbestos	Hazardous	Office/Site		Specialist Contractor
Fluorescent Tubes	Hazardous	Office/Site	Coffins	Specialist Contractor
Waste Pallets	Non	Site	Skip	Re-used/Recycle
Storage of Fuel	Hazardous	Office	Self Contained	Specialist Contractor
Food	Non	Office/Site	Bins/Skip	Landfill
Wood	Non	Site	Site/Yard	Re-used/Recycle
Flooring	Non	Site	Site	Re-used/Recycle
Paint	Hazardous	Site	Site/Store	Re-used/Recycle
Plastic piping	Non	Site	Site	Re-used/Recycle
Plastic Guttering	Non	Site	Skip	Re-used/Recycle
Ceiling Tiles	Non	Site	Skip	Recycled
Electrical Wiring etc.	Non	Site	Skip	Recycled
Plasterboarding	Non	Site	Skip	Recycle
Other Construction Waste (stone & tiles)	Non	Site	Skip	Re-used/Recycle
Left Over Site Goods	Non	Return to Yard	Yard / Stores	Re-used/Recycle
WEEE	Non		Licensed Carrier	Re-used/Recycle
Old/Damaged Plant	Non Hazardous		Trade-in	
Sewage	Hazardous	Office/Site	Drains	Sewage works
Portaloos	Hazardous	Site	Portaloos	Specialist Contractor

13 WATE CARRIERS INFORMATION

The management of waste materials is a cornerstone of responsible environmental management. It is

important that all waste is stored on site in such a way that it cannot escape. Stored waste should be protected against the weather elements, theft and vandalism. Waste can contaminate the land, air and water as well as harm natural vegetation or wildlife if stored or disposed off incorrectly.

Different types of waste often require different method of treatment and disposal. In order to make this possible, it is important that all waste generated is separated and placed in the correct skips / waste containers.

The Producer is normally the Principal Contractor / Sub Contractor.

<u>The Carrier</u> is the contractor taking the waste off site.

<u>A Waste Transfer Note</u> (Duty of Care Controlled Waste Transfer Note) = An essential document, must be completed when waste is transferred. Controlled waste transfer notes are used to keep a record of the waste when it is transported, to ensure it is not dumped illegally or that illegal or hazardous substances are not disguised as some other material. Any material not treated correctly can be traced back to the producer using the paper trail provided by Duty of Care Controlled Waste Transfer Notes.

The Disposal Site is the final destination of the waste.

ROC Certificate issued by the council. Approved Waste Carriers Licenses (GB & NI) – Sample Certificate

<u>European Waste Codes</u> are specific codes associated with numerous materials. These include plastics, wood etc.

<u>Special Waste</u> is any waste with hazardous properties which may render it harmful to human health or the environment. It is also referred to as being Hazardous waste.

<u>A Consignment Note</u> is a document prepared by a consignor and countersigned by the carrier as a proof of receipt of consignment for delivery at the destination.

Weighbridge Ticket

A weighbridge is a large set of scales usually mounted permanently on a concrete foundation, that is used to weigh entire road vehicles and their contents. By weighing the vehicle both empty and when loaded, the load carried by the vehicle can be calculated.

14 RELATIONSHIPS WITH LOCAL COMMUNITIES

Trainor Stone & Tiling Limited will endeavour to foster good relationships with local communities wherever it operates. This may include using local labour and materials. We will avoid causing nuisance E.g. noise, traffic or pollution to our neighbours and encourage communication between

staff and local communities.

Good Neighbour Policy

Our approach is at all times to work with management to ensure the works we are required to carry out happen at times and in ways to minimise the impact on commercial neighbours. Good neighbouring relations will be upheld at all times. We would naturally advise and communicate with these neighbours to give them the courtesy of being told of the likely impacts on them and to take on board any concerns or objections they may have and to try and accommodate them as best we can. The Contracts Director will make available their full contact details and details of the Site Manager prior to works commencing this will include: Mobile number; Office Telephone number; E-mail address; Office address.

Trainor Stone & Tiling do not envisage any particular unusual or abnormal circumstances that may create difficulties with the commercial neighbours in the centre. We will give due consideration to control of noise and vibration during works. Trainor Stone & Tile's approach is at all times to work with Management to ensure the works we are required to carry out happen at times and in ways to minimise the impact on commercial neighbours. We would naturally advise and communicate with these neighbours to give them the courtesy of being told of the likely impacts on them and to take on board any concerns or objections they may have and to try and accommodate them as best we can.

Trainor Stone & Tile will liaise with the Client/rep, particularly in respect to the handover of areas prior to full practical completion. The Management Team can be introduced to the site environment prior to commencement of the tasks on site.

- They will receive site safety induction
- They will be informed of designated travel routes for their area of work
- Works will be completed and signed over to the client before staff take handover.

15 KEY PERFORMANCE INDICATORS

Trainor Stone & Tiling Limited will compile a set of key performance indicators (KPIs) that will act as a guide to its overall operational sustainability. The KPIs will be limited to those that can cost effectively be measured and have real meaning. Each KPI will incorporate an achievable but challenging performance target. Annually performance against the KPI targets will be reported against the KPIs reviewed and new targets set.

16 ASPECTS AND IMPACTS REGISTER

This register has been prepared in accordance with Trainor Stone & Tiling EMS. It provides a schedule

TRAINOR STONE & TILE ENVIRONMENTAL POLICY

of Aspects highlighting the significant environmental impacts on a company wide basis. This Register should be considered to detail significant aspects for all our associated works.

<u>Aspect-</u> Element of an organization's activities, products or services that can interact with the environment

Impact- The impact on the environment created by an industry, service, plan or project.

17 TOOLBOX TALKS

The development and maintenance of a safe working culture and an environmentally friendly workplace can only be effective if everyone is included and actively involved. The use of "toolbox talks" is an invaluable means of involving those most at risk, the employees, sub-contractors and self-employed, without incurring any significant time or financial penalty. Thus Trainor Stone & Tiling Limited have produced this "Toolbox Talks Manual" to assist us and in particular the likes of contracts Directors/managers, site managers, foremen, charge-hands, etc, to implement an efficient system of conducting regular toolbox talks with minimum effort whilst hopefully achieving maximum gain.

Which talks?

Included in the manual are toolbox talks covering most construction site activities and environmental issues. Users can select talks based upon primary company or site activity or maybe on areas of concern. Additional toolbox talks can also be added as and when required.

Summary

Toolbox talks provide a convenient and effective method of communicating and reinforcing the health, safety and environmental message throughout the workforce and if used properly can significantly enhance the development of a safe working culture. The cost of implementing a regular toolbox talk system is minimal, 10-15 minutes a week! The benefits will include greater awareness, with the potential to reduce accident rates, and possibly even save a life.

The question is not "can you be bothered?" - it's "can you afford not to be?"

Toolbox Talks - Environmental

Dust & Air Quality	Waste Hierarchy
Cement	Segregation of Waste
Segregation of Waste	Storage of Petrol/Fuel/Oils
Spill Control	Trees
Waste Management	Water Use Discharge
Washing Down Plant & Machinery	Nuisance
Waste Storage	Plants & Animals
Contaminated Land	Energy & Fuel Efficiency
Good Neighbours	Fuel & Oil
Attendees Sign-Off Sheet	Blank

18 EMERGENCY PREPAREDNESS & RESPONSE

Through the environmental aspects evaluation process, Trainor Stone & Tiling has identified measures to mitigate and prevent environmental emergency situations. An Emergency Preparedness & Response Procedure (I060) is located on the Trainor Stone & Tiling Management portal. Each Trainor Stone & Tiling van has been equipped with a spill kit.

19 LIGHTING

- Site Office Should be suitably and sufficiently lit for the works taking place
- Task Lighting should be installed into darkened areas providing suitable and sufficient lighting for the works taking place
- Site Lighting All walkways and workplaces should be sufficiently lit.

20 NOISE

There is a statutory duty to control noise and protect workers and other persons from its effects. Excessive noise can cause permanent damage to the hearing of those exposed to it.

Every practicable step should be taken to control the problem:

- Silencers
- Use of suitable equipment
- Screens or Absorption walls
- Reduction of noise at source

- Isolate the workers & wear PPE
- Damping Using insulating floor mounting
- Marking of noisy area as ear protection zones
- Enclosure Surrounding the source with a good insulator
- Change the process, equipment or location of the equipment
- Noise should be minimised whenever possible
- Sub contractors should measure the amount of noise generated from their works and ensure that noise reduction is implemented whenever possible
- Timeframes and Noisy works
- Trainor Stone & Tile should carry out works in accordance with the Clients/premises rules/regulations/guidelines.

21 HEATING AND VENTILATION

Sources of heat include:

- Portable electric heater
- Air conditioning units (built-in and portable)
- Oil heating

Sources of ventilation include:

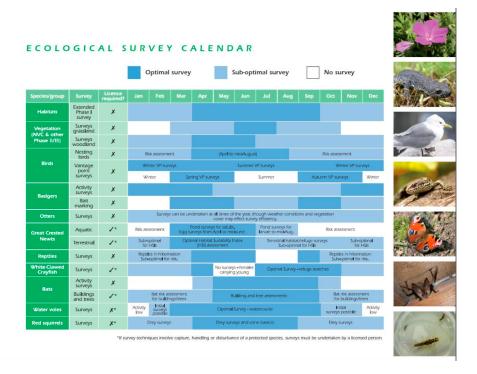
- Fans
- Air conditioning units (built-in and portable)
- Open windows Open doors

22 DUST AND FUMES

It is essential that dust and fumes are kept to a minimum whilst carrying out the works on site. All sub contractors works shall be risk assessed with suitable and sufficient controls measures put in place. Trainor Stone & Tiling Site Manager shall carry out Daily Workplace Recorded Inspections and apply further control measures if required.

23 ECOLOGICAL SURVEY CALENDAR

The following chart should be used as a reference document.



24 SITE WASTE MANAGEMENT PLAN

Site Waste Management Plan

Job No.			
Job Name			
Client			
Start Date		End Date	
Site Manger			
Floor Area SQM		Number of Floors	
Description of			
Works			
Drafted By		Date	
Document Control			
Version	Date	Compiled By	Company

The person in charge of the project and the principal contractor will take all reasonable steps to ensure that:

- (a) all waste from the site is dealt with in accordance of the waste duty of care in section 34 of the Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regulations 1991: and
- (b) materials will be handled efficiently and waste managed appropriately

Person in Charge of the project (Client)			
Signed By:			
Print Name			
Position			
Date			
Person in charge of the project (PC)			
Signed By:			
Print Name			
Position			
Date			

Trainor Stone & Tiling Limited are committed to the reduction of the resources used in our activities at all levels. We recognise the need to minimise waste generated on our sites and at head office and the level of materials that are thrown away unused. To this end we have implemented the following procedures:

Procurement

We have written to all our material suppliers with regard to their Site Waste Management Policies re packaging etc and also in relation to sustainability, and to establish points of contact with our supply chain for moving this issue forward together. We have also asked that they will take back any excess materials that are unused on site where it is economical to return them.

Design

We have written the employer asking them to confirm that they have given consideration to site waste management issues with their design not requiring unnecessary waste.

Contracts

We have amended our sub-contractors and waste management contractors order advising them of

our Site Waste Management Policy and asking for a copy of their policies and procedures. We also require them to segregate the waste they may generate on site where practicable and to take all reasonable steps to minimise on site waste.

Processes

We are monitoring the level of material usage through our material ordering system and the level of site waste through our site waste management worksheet. We have spoken to our site managers re the level of ordering of materials and its waste implications. We will monitor the level of waste we generate and endeavour where viable to segregate waste on site for recycling. We will work with our skip hire companies to develop strategies to maximise the level of recycling of materials removed from site. We are committed to continue improvement through quality system through the use of training and education of staff and contractors with continual Contractor and sub contractors assessments.

On-Site

We shall educate our workforce with regard to site waste management issues and try to measure site by site performance and develop a framework for all our operations and their waste management. We have put up posters letting all site staff know of the issues and raising awareness of them. We have made suitable containers available to segregate the following wastes:

Site specific issues:

Waste storage – Waste will be removed daily from site by XXXXXXX.

Waste removal – XXXXXXX will remove all waste on this project and segregate / dispose off site.

Waste transfer notes are checked / monitored / audited

Checking waste contractors have correct licenses

Site information - Notice boards, toolbox talks and newsletters

Audits and inspections that will be carried out as to ensure and monitor

Post Project review. The site waste management plan is to be reviewed on completion of the project

Duty of care checklist:

Ensure all wastes stored safely and securely

Ensure all waste contractors have appropriate licenses

Ensure waste transfer notices being properly maintained and retained

Are there any hazardous wastes? If yes ensure there are properly completed consignment notices.

PROJECT STAGE	TYPE OF WASTE	NUMBERS OF SKIPS ANTICIPATED	TYPE OF SKIP (VOLUME)	TARGET FOR RECYCLING