

# Environmental Management Policy

<b>Originator:</b>	Policy and Strategy Team
<b>Approval date:</b>	26 <sup>th</sup> January 2018
<b>Review date:</b>	January 2021

1	Introduction
1.1	As responsible business and employer, Carroll Build will examine every aspect of its core business activities to identify opportunities to reduce waste / reuse materials and minimise where possible any negative environmental impact.
1.2	<p>This Policy covers the waste creation, disposal and recycling opportunities that are created by Carroll Build core business activities of:</p> <ul style="list-style-type: none"> <li>• Development (new build)</li> <li>• All other commercial contracts</li> <li>• Back office and corporate functions</li> </ul>
1.3	The policy does not cover the waste or recycling obligations of customers for whom Carroll Build provides services, although every effort will be made to work in partnership with clients and point of service customers to promote responsible waste management and recycling regimes.
1.4	The policy also covers the wider activities Carroll Build engage in to support the upkeep and delivery of its structured environmental management system that meets ISO 14001 criteria and assessment.
1.5	<p>In operating the Policy Carroll Build will ensure it meets the requirements of the relevant legislation and regulatory codes as follows:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Act 1990</li> <li>• Environmental Protection (Duty of Care) Regulations 1991</li> <li>• Environmental Permitting Regulations 2010</li> <li>• Hazardous Waste Regulations 2005</li> <li>• List of Waste Regulations 2005</li> <li>• The Waste Framework Directive (WFD) 2008</li> <li>• The Waste (England and Wales) Regulations (WR) 2011</li> <li>• Waste Electrical and Electronic Equipment (WEEE) 2013</li> <li>• Waste Transfer Regulations 2005</li> </ul>

	<ul style="list-style-type: none"> <li>• Control of Substances Hazardous to Health (COSHH) 2002 as amended</li> <li>• Environmental Damage Regulations 2009</li> <li>• Control of Pollution (Oil Storage Regulations) 2001</li> </ul>
1.6	<b>Access and Communication</b>
1.6.1	Carroll Build is committed to ensuring that the services it provides are accessible to everyone. Carroll Build will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for Carroll Build or use its services.
1.7	<b>Equality, Diversity and Human Rights</b>
1.7.1	Carroll Build is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Reassignment, Sexual Orientation, Pregnancy and Maternity, Marital Status, Religion and/or Belief.
1.7.2	Carroll Build also recognises that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.
1.7.3	Carroll Build will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom Carroll Build works, will adhere to the central principles of the Human Rights Act (1998).

<b>2</b>	<b>Statement of Intent</b>
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2.1	<p>Carroll Build is committed to reduce as far as is practically possible any negative environmental impacts that may arise from its core business activities. This will be achieved through consistent application of:</p> <ul style="list-style-type: none"> <li>• Planning environmental objectives, targets and programmes</li> <li>• Implementing processes</li> <li>• Checking and auditing of activities</li> <li>• Reviewing and delivering continuous improvement</li> </ul>
2.2	<p>In operating this Policy, Carroll Build will seek to achieve the following environmental goals:</p> <ul style="list-style-type: none"> <li>• Comply with all relevant legislation, standards and codes of practice relevant to operations</li> <li>• Strive to make efficient use of energy and materials, including substitution of renewable resources wherever possible</li> <li>• Reduce waste by actively promoting the recycling of materials and the use of recycled goods and ensure that all associated residual waste materials are disposed of in a safe and responsible fashion</li> <li>• Seek to reduce the volume of fuel consumption throughout the vehicle fleet</li> </ul>

<p>2.3</p> <p>2.4</p> <p>2.5</p> <p>2.6</p> <p>2.7</p>	<ul style="list-style-type: none"> <li>• Seek to reduce harmful emissions wherever possible</li> <li>• Reduce energy and materials (including water use) consumption in Carroll Build offices</li> <li>• Reduce its Carbon Footprint</li> <li>• Promote environmental awareness to employees, sub contactors and customers</li> <li>• Ensure that the Policy is brought to the attention of all employees</li> <li>• Promote good environmental practice in construction and building use, where possible</li> </ul> <p>In operating the Environmental Management Policy, Carroll Build will at all times strive to achieve value for money and best practice by applying the principles of:</p> <ul style="list-style-type: none"> <li>• Prevention (where this applies)</li> <li>• Prepare for re-use</li> <li>• Recycling</li> <li>• Other Recovery</li> <li>• Disposal</li> </ul> <p>Carroll Build will ensure that all actions it undertakes to implement the Policy have due regard to the health and safety considerations for operatives and customers. This will include complying with all regulations surrounding the transfer and disposal of materials classed as 'hazardous waste'.</p> <p>Carroll Build will also maintain an environmental 'aspects and impacts register' of all of its core activities. The register will help Carroll Build identify the most significant activities where there is an interaction with the environment, whether that be the physical environment or with people, to maximise positive impacts and to mitigate and control any negative impacts.</p> <p>Carroll Build will have robust practices in place to mitigate potential negative impacts which may be caused by the use or storage of substances and materials that have potential to cause damage to the environment.</p> <p>In operating this Policy, Carroll Build will ensure a safe-working environment for its employees at all times as required by the Health and Safety Executive guidelines and other relevant legislation.</p>
<p><b>3</b></p>	<p><b>Policy</b></p>
<p>3.1</p> <p>3.2</p> <p>3.2.1</p> <p>3.2.1.1</p>	<p>Carroll Build applies the waste hierarchy principles of 'reduce, re-use and recycle' to all of its core business activities. Outlined below are the ways in which these principles are applied to create efficiencies and reduce any negative environmental impacts:</p> <p><b>Actions to Reduce Waste</b></p> <p><b>Procurement and Resource Planning</b></p> <p>Carroll Build is committed to continually monitoring and reviewing its supply chain management to ensure a quality / cost balance is achieved. Where possible Carroll Build will seek to source all materials required to complete core business activities from local</p>

	<p>suppliers with local distribution centres / depots, reducing emissions associated with transportation. Where it is not possible to purchase materials locally, Carroll Build will look to procure materials from sustainable sources.</p>
3.2.1.2	<p>Carroll Build will manage materials to ensure they become available as needed, avoiding stock piling and reducing the potential for wastage by perishable materials going out of date or becoming obsolete e.g. plaster or cement.</p>
3.2.1.3	<p>Carroll Build will ensure the effective implementation of this Policy through accurate estimations of material quantities on a job by job basis and close control of purchasing activities for projects (particularly where works are standardised and replicated across a number of units displaying identical or similar characteristics).</p>
3.2.2	<p><b>Reducing Emissions associated with Business Travel</b></p>
3.2.2.1	<p>Through the use of a GPS (Global Positioning System) tracker devices in fleet vehicles, Carroll Build is able to access complete diagnostics of all journeys undertaken. Carroll Build will use this information to reduce inefficiencies in business journeys and educate operatives on the most cost effective driving styles to reduce fuel consumption.</p>
3.2.2.2	<p>Carroll Build is also committed, where possible, to employing local labour reducing the amount of ‘travel to work’ emissions for its staff.</p>
3.2.2.3	<p>Carroll Build uses a locally based Waste Contractor partner which is ideally situated to process trade waste and thereby reduce the distance the trade vehicles have to travel.</p>
3.2.3	<p><b>Reducing Negative Environmental impact through Design Process</b></p>
3.2.3.1	<p>Carroll Build is committed to promoting the development of properties that are both environmentally friendly and sustainable. If Carroll Build is commissioned to build new properties, it will hold early discussions with the client at design stage to ensure that design proposals meet the expected environmental standards and sustainability requirements. Where an agreement is reached on any alterations in design specification, Carroll Build will work with the client to ensure the right materials are sourced to meet the specification.</p>
3.2.3.2	<p>Carroll Build will ensure that open lines of communication are maintained throughout a project lifespan from mobilisation through to Practical Completion and beyond, if any latent defects occur linked to the original design features.</p>
3.2.3.3	<p>As a responsible developer, Carroll Build is committed to promoting environmentally friendly principles and lifetime homes standards. Carroll Build will at early stages of design liaise with its clients about ways to achieve these standards , including:</p> <ul style="list-style-type: none"> <li>● Sourcing eco-friendly building materials</li> <li>● Building energy efficient homes</li> <li>● Water conservation</li> </ul>
3.3	<p><b>Construction near Protected Sites and Wildlife</b></p>
3.3.1	<p>Carroll Build carries out habitat and wildlife risk assessments and ensure alternative provisions are put in place. To assist us in mitigating this risk Carroll Build employ a number</p>

	<p>of industry leading experts to carry out site assessments and provide environmental / ecological reports including recommendations. Carroll Build will always act on these recommendations and adjust developments' design features accordingly, where applicable.</p>
3.3.2	<p>Where the site assessments find that protected species could be present on or near the proposed site of the development, Carroll Group will seek experts' advice which may include (but not limited to):</p> <ul style="list-style-type: none"><li>• Assessing the impacts of the development on the protected species</li><li>• Adjusting the plans, if possible</li><li>• Providing access routes for wildlife movement and developing alternative habitats</li></ul>
3.4	<p><b>Actions to Reuse Materials</b></p>
3.4.1	<p>Carroll Build is committed to the principles of reusing materials, wherever possible, however the nature of its core business activities means the opportunities are limited in this area.</p>
3.4.1.1	<p>To meet clients' specifications and maintain high levels of point of service customer's satisfaction, Carroll Build will use materials and components that are cost effective and offer the greatest notional life. This in many circumstances necessitates the use of new materials and components limiting the scope for 'reuse' of materials.</p>
3.4.1.2	<p>Carroll Build will, however, reuse all materials that are purchased as new from one job to another where there are overestimations of quantities required or actual amounts used lead to a surplus e.g. reusing lengths of pipe work required for plumbing or gas installation and repair works. Carroll Build will recycle materials wherever possible in construction e.g. use of recycled hard core.</p>
3.5	<p><b>Actions to Recycle Materials</b></p>
3.5.1	<p><b>Recycling Trade Waste</b></p>
3.5.1.1	<p>Throughout all of its core business activities Carroll Build is committed to reducing waste, wherever possible, and has in place accurate recording mechanisms with its preferred processing contractors to provide detailed reports on all trade waste that is recycled.</p>
3.5.1.2	<p>Carroll Build is able to provide reports on the tonnage of trade waste recycled across all core business activities for the following materials:</p> <ul style="list-style-type: none"><li>• Plaster</li><li>• Tarmac</li><li>• Brick</li><li>• Roof tiles</li><li>• Glass</li><li>• Ceramics</li><li>• Soil</li><li>• Insulation</li><li>• Concrete</li><li>• Metal</li><li>• Packaging</li></ul>

	<ul style="list-style-type: none"> <li>● Paper /Card</li> <li>● Plasterboard</li> <li>● Plastic</li> <li>● PVC frames</li> <li>● Wood</li> <li>● Green Waste</li> </ul>
3.5.1.3	Carroll Build aims to be amongst the best companies across all sectors for recycling and consistently exceeds Waste and Resources Action Programme (WRAP) best practice targets of between 70 and 80% for recycling of trade waste materials.
3.5.1.4	Carroll Build also has in place effective arrangements to ensure any waste produced from its office based activities is sorted and recycled including special arrangements for recycling of confidential waste, cardboard and packaging, timber and reuse of electrical / computer equipment in accordance with WEEE 2013 Regulations.
3.6	<b>Classifying and Transferring Waste</b>
3.6.1	Carroll Build ensures all waste created from its core business activities is classified and transferred correctly on site, in compliance with the List of Waste Regulations 2005 and the Waste Regulations 2011. In fulfilling its obligations in this area Carroll Build will ensure all relevant documentation is completed including:
3.6.1.1	Carroll Build will ensure that waste transfer notes for non-hazardous waste is completed, including: <ul style="list-style-type: none"> <li>● A general description of the waste</li> <li>● The quantity of the waste</li> <li>● How the waste is packaged or contained – (including a signed declaration that the waste hierarchy requirements have been applied)</li> <li>● The address from where the waste has been collected and the party receiving the waste (including relevant permits and licenses)</li> <li>● The date, time and place of transfer</li> <li>● The appropriate waste codes (depending on the category of waste being transferred)</li> </ul>
3.6.1.2	Carroll Build will ensure that consignment notes for hazardous waste is completed, including: <ul style="list-style-type: none"> <li>● Notification details (details of the producer of the waste)</li> <li>● A description of the waste including list of Waste Codes and quantities – (including a signed declaration that the waste hierarchy requirements have been applied)</li> <li>● Details of the Carriers Certificates (the person who carries or transports the waste)</li> <li>● Details of the Consigners Certificates (the person requesting the waste to be removed)</li> <li>● Details of the Consignees Certificates (the person who receives the waste to recover or dispose of it)</li> </ul>
3.6.1.3	Carroll Build will retain records of transfer notes and consignment notes for a minimum of two and three years respectively.

3.7	<p><b>The 'Aspects and Impacts' Register</b></p>
3.7.1	<p>Carroll Build has compiled a register of all of its core activities to determine which areas of its work, the products it uses and the services it provides has the biggest impacts on the environment.</p>
3.7.2	<p>Each area of activity is then given a risk factor to determine its priority for immediate action through the use of control measures or provides a target for improvement based on:</p> <ul style="list-style-type: none"> <li>• Legislative requirements</li> <li>• The potential for harmful environmental impacts, i.e. pollution</li> <li>• The reaction of third parties to the activity, i.e. the effects it has on customers, clients and others on whom the activity touches</li> <li>• The magnitude of the activity (and quantities produced – where waste is concerned) as a proportion of Carroll Build's overall activities</li> </ul>
3.7.3	<p>In maintaining the register Carroll Build also includes all of its office based activities, supply chain management and procurement functions to ensure the approach to environmental management is all encompassing.</p>
3.8	<p><b>Substances Hazardous to Health</b></p>
3.8.1	<p>As a responsible employer, Carroll Build will aim to provide a safe working environment for its operatives at all times including the need to comply with the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended). In meeting its duties under COSHH, Carroll Build will follow the good practice guidelines produced by the Health and Safety Executive as follows:</p> <ul style="list-style-type: none"> <li>• Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health</li> <li>• Take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures</li> <li>• Control exposure by measures that are proportionate to the health risk</li> <li>• Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health</li> <li>• Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment</li> <li>• Check and review regularly all elements of control measures for their continuing effectiveness</li> <li>• Inform and train all employees on the hazards and risks from the substances they work with and the use of control measures developed to minimise the risks</li> <li>• Ensure that the introduction of control measures does not increase the overall risk to health and safety</li> <li>• Dispose of substances hazardous to health in line with Material Safety Data Sheet requirements</li> </ul>
3.8.2	<p>In addition to the above, Carroll Build will comply with regulations for working with other materials that are known to pose a risk to health, that are not covered by the COSHH regulations including Asbestos .</p>

3.9	<p><b>Management of Spills of Potential Pollutants</b></p>
3.9.1	<p>In line with its requirements under the Environmental Damage Regulations 2009, Carroll Build will carry out risk assessments for all activities and locations where there is potential for materials used to cause environmental damage including:</p> <ul style="list-style-type: none"> <li>• Serious damage to surface water or ground water sources</li> <li>• Contamination of land where there is significant risk to human health</li> <li>• Serious damage to natural habitats</li> </ul>
3.9.2	<p>The risk assessment will as a minimum seek to:</p> <ul style="list-style-type: none"> <li>• Identify the materials stored or handled that may be a hazard</li> <li>• Identify and assess potential links between each hazard source, pathways and receptors i.e. the location and nature of potential escape routes for pollutants (for example water courses or drainage facilities)</li> <li>• Asses the likelihood and magnitude of any potential harmful effects</li> <li>• Ensure suitable prevention measures are in place through effective site management procedures e.g. use of correct signage and secure storage of harmful materials</li> </ul>
3.9.3	<p>Where significant risks are identified, Carroll Build will draw up a site-specific Incident Response Plan that will include:</p> <ul style="list-style-type: none"> <li>• Contact details of the Carroll Build operative that will act as a major incident coordinator</li> <li>• Reporting requirements to the Environmental Agency for any major spill incidents that have potential to cause harm to people or the environment</li> <li>• An outline of how the potential clean-up operation will be managed</li> <li>• How any residues will be safely removed and disposed of</li> <li>• Contact details for registered clean-up contractors, if required</li> </ul>
3.9.4	<p>In addition, Carroll Build will provide training for staff whose roles and working environment increases the risks posed by major spill incidents, so they know:</p> <ul style="list-style-type: none"> <li>• What they should / shouldn't do in the event of major spill</li> <li>• Where they can access personal protective and pollution control equipment / materials</li> <li>• Where they can access the site-specific incident response plan</li> </ul>
<b>4</b>	<b>Implementation</b>
4.1	<p>All Carroll Build employees have a responsibility for being aware of and implementing the Carroll Build Environmental Management Policy.</p>
4.2	<p>The Health &amp; Safety, Environment and Quality (HSEQ) Team will have specific responsibility for ensuring all necessary certification and licenses, that support the operation of this Policy are in place and up-to-date which will be checked regularly through system audits.</p>

<b>5</b>	<b>Performance</b>	
5.1	<p>The following performance indicators that underpin the operation of this Policy will be published quarterly in the Performance Management System :</p> <ul style="list-style-type: none"> <li>• % reduction in electricity consumption in Carroll Build offices</li> <li>• Achieve 90% for recycling of construction waste</li> <li>• Achieve 85% for office waste recycling</li> <li>• % increase in the volume of wastepaper recycling year on year</li> <li>• % reduction in total carbon footprint (CO2) emissions from office and fleet use by 40% in comparison with the base year's data</li> <li>• % reduction in fuel use consumed by Carroll Build vehicles</li> </ul>	
5.2	<p>The above targets will be reviewed and amended on an annual basis, based on actual performance.</p>	
<b>6</b>	<b>Review</b>	
6.1	<p>The Policy will be reviewed once every three years from the date of the Managing Director - Carroll Build approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to Carroll Build working practices / as a result of system audits.</p>	
<b>7</b>	<b>Equality Impact Assessment</b>	
7.1	Was a full Equality Impact Assessment (EIA) required?	No
7.2	When was EIA conducted and by who?	The EIA relevant test was conducted by the Policy Writer and Policy and Strategy Manager on 25 January 2018
7.3	Results of EIA	The EIA relevant test did not reveal any differential impacts for any group of the people with protected characteristics.
<b>8</b>	<b>Scheme of Delegation</b>	
8.1	Responsible officer for approving and monitoring implementation of the Policy and any amendments to it	Managing Director- Carroll Build
8.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Managing Director- Carroll Build

8.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Managing Director- Carroll Build	
<b>9 Amendment Log</b>			
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
Not Applicable-this is the first version of the Policy for Carroll Build	Not applicable	See section 6	Not Applicable