

Environmental Management Policy

Originator:	Policy and Strategy Team
Approval date:	26 th January 2018
Review date:	January 2021

1	Introduction
1.1	As responsible business and employer, Carroll Waste will examine every aspect of its core business activities to identify opportunities to minimise risk of pollution, including those arising from its waste management operations.
1.2	This will also cover other associated activities i.e. maintenance of waste processing plant and equipment, reporting of accidents in connection with core work activities and incidents or non-conformance to regulatory codes / standards of operation.
1.3	The Policy covers provisions that Carroll Waste has in place to comply with standard rules to operate a transfer station for: <ul style="list-style-type: none"> • Household Waste • Commercial Waste • Industrial Waste
1.4	The Policy also covers the wider activities Carroll Waste engages in to support the upkeep and operation of its waste management station.
1.5	In operating this Policy, Carroll Waste will ensure it meets the requirements of the relevant legislation and regulatory codes as follows: <ul style="list-style-type: none"> • Environmental Protection Act 1990 • Environmental Protection (Duty of Care) Regulations 1991 • Environmental Permitting Regulations 2010 • Hazardous Waste Regulations 2005 • List of Waste Regulations 2005 • The Waste Framework Directive (WFD) 2008 • The Waste (England and Wales) Regulations (WR) 2011 • Waste Electrical and Electronic Equipment (WEEE) 2013 • Waste Transfer Regulations 2005 • Control of Substances Hazardous to Health (COSHH) 2002 as amended • Environmental Damage Regulations 2009 • Scrap Metal Dealers Act 2013

	<ul style="list-style-type: none"> Control of Pollution (Oil Storage Regulations) 2001
1.6	Equality, Diversity and Human Rights
1.6.1	Carroll Waste 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 and Religion and/or Belief.
1.6.2	Carroll Waste 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.
1.6.3	Carroll Waste 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 Waste works, will adhere to the central principles of the Human Rights Act (1998).

2	Statement of Intent
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2.1	<p>In operating this Policy, Carroll Waste is committed to comply with the with Article 6 of the Directive 2008/98/EC by:</p> <ul style="list-style-type: none"> Meeting all criteria set out in any relevant and applicable EU End of Waste regulations A case-by-case assessment taking into account the applicable case law, which includes meeting all requirements of a relevant and applicable Quality Protocol or Defined Industry Code of Practice (e.g. CL:AIRE Development Industry CoP)
2.2	<p>Carroll Waste is also 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"> Planning environmental objectives, targets and programmes Implementing processes Checking and auditing of activities Reviewing and delivering continuous improvement
2.3	<p>Carroll Waste will operate a structured management system in compliance with ISO 14001:2015 requirements. Within the structured framework, Carroll Waste will seek to achieve the following environmental goals:</p> <ul style="list-style-type: none"> Comply with all relevant legislation, standards and codes of practice relevant to operations Reduce waste by actively promoting recycling Seek to reduce the volume of fuel consumption throughout the vehicle fleet Seek to reduce harmful emissions, wherever, possible Reduce energy consumption in Carroll Waste offices and buildings

	<ul style="list-style-type: none"> • Reduce the overall Carbon Footprint • Promote environmental awareness to employees, sub contactors and customers • Ensure that the Policy is brought to the attention of all employees
2.4	<p>Carroll Waste operates a Waste Transfer Station in accordance with Standard Rules Permit SR2008 No3_75KTE – Household, Commercial and Industrial Waste Transfer Station with Treatment – Existing Permits. All site operations will be carried out in accordance with the requirements of this Environmental Permit and the relevant planning permissions.</p>
2.5	<p>Only waste which is listed in Table 2.2 of Standard Rules Permit SR2008No3_75kte is accepted at the waste facility in accordance with the site’s Environmental Permit. The waste will be derived from local households and businesses.</p>
2.6	<p>Carroll Waste will ensure that it meets or exceeds all legislative and regulatory requirements in regard to its activities in the following areas:</p> <ul style="list-style-type: none"> • General Management of Waste • Recovery and disposal of wastes produced by activities • Waste acceptance in regards to type, quantity and conformity to description by producer or holder
2.7	<p>Carroll Waste will comply with all actions required to transport waste and recyclable materials from one place to another, i.e. from the source of the waste to where it can be processed into re-useable materials.</p>
2.8	<p>In complying with the requirements of the Waste Carriers License (issued by the Environment Agency), Carroll Waste will:</p> <ul style="list-style-type: none"> • Ensure all vehicles delivering waste are registered waste carriers and each delivery is accompanied by a relevant Waste Transfer Note • Ensure waste materials are safely contained to avoid dispersal • Complete all necessary documentation • Comply with the waste hierarchy principles referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities as per the Standard Rules Permit SR2008 No3_75KTE
2.9	<p>Carroll Waste will at all times seek to achieve value for money and best practice by applying the principles of the Waste Hierarchy :</p> <ul style="list-style-type: none"> • Prevention (where this applies) • Prepare for Re-use • Recycling • Other Recovery • Disposal
2.10	<p>Carroll Waste will ensure that all actions it undertakes to implement the above principles have due regard to the health and safety considerations for operatives and point of service customers. This will include complying with all regulations surrounding the transfer and disposal of materials classed as 'hazardous waste'.</p>

2.11 Carroll Waste will also maintain an environmental 'aspects and impacts register' of all of its core activities. The register will help Carroll Waste 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.

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3.1 Carroll Waste applies the waste hierarchy principles of 'Prevent, Prepare for Re-use, recycle, Other Recovery and Disposal' 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:

3.2 **Actions to Reduce Waste**

3.2.1 **Reducing Emissions**

3.2.2 Carroll Waste will carry out all activities associated with waste management operations in a manner which minimises the impact on environment as required by relevant legislation and guidance documents.

3.2.3 Carroll Waste is also committed to reducing the negative environmental impacts associated with vehicle emissions. Carroll Waste achieves this aim by:

- Where possible, employing local labour to reduce the amount of 'travel to work' emissions for its staff
- Implementation of systems for Carroll Waste fleet vehicles, ensuring efficient route planning and reducing unnecessary journeys when transporting waste

3.3 **Actions to Recycle Materials**

3.3.1 **Recycling Trade Waste**

3.3.2 Throughout all of its core business activities, Carroll Waste is committed to recycling waste, wherever possible and has in place accurate recording mechanisms to provide detailed reports to all their clients on all trade waste that is recycled.

3.3.3 Carroll Waste is able to provide reports on the tonnage of trade waste (for each supplier or holder) that is recycled for the following materials:

- Plaster
- Tarmac
- Brick
- Roof tiles
- Glass
- Ceramics
- Soil
- Insulation
- Concrete
- Metal

- Packaging
- Paper /Card
- Plasterboard
- Plastic
- PVC frames
- Wood
- Green Waste

3.3.4 Carroll Waste 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.

3.4 **Recycling of Metals**

3.4.1 Where scrap metals are recovered, these will be taken to licensed scrap metal dealerships that offer the most efficient travel distance and central records will be kept.

3.5 **Classifying and Transferring Waste**

3.5.1 Carroll Waste ensures all waste has been classified and transferred correctly, in compliance with the List of Waste Regulations 2005 and the Waste Regulations 2011. In fulfilling its obligations in this area, Carroll Waste will ensure all relevant documentation is completed.

3.5.2 Carroll Waste will ensure that Waste Transfer Notes for non-hazardous waste are completed including:

- A general description of the waste
- The quantity of the waste
- How the waste is packaged or contained – (including a signed declaration that the waste hierarchy requirements have been applied)
- The address from where the waste has been collected and the party receiving the waste (including relevant permits and licenses)
- The date, time and place of transfer
- The appropriate waste codes (depending on the category of waste being transferred)

3.5.3 Carroll Waste will also make sure that Consignment Notes for hazardous waste are completed including:

- Notification details (details of the producer of the waste)
- A description of the waste including list of Waste Codes and quantities – (including a signed declaration that the waste hierarchy requirements have been applied)
- Details of the Carriers Certificates (the person who carries or transports the waste)
- Details of the Consigners Certificates (the person requesting the waste to be removed)
- Details of the Consignees Certificates (the person who receives the waste to recover or dispose of it)

3.5.4 Carroll Waste will securely retain records of Waste Transfer Notes and consignment notes for a minimum of two and three years respectively.

3.6 **The 'Aspects and Impacts' Register**

3.6.1 Carroll Waste 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.

3.6.2 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:

- Legislative requirements
- The potential for harmful environmental impacts, i.e. pollution
- The reaction of third parties to the activity, i.e. the effects it has on customers, clients and others on whom the activity touches
- The magnitude of the activity (and quantities recycled – where waste is concerned) as a proportion of Carroll Waste's overall activities

3.6.3 In maintaining the register Carroll Waste also includes all of its office based activities, supply chain management and procurement functions to ensure the approach to environmental management is all encompassing.

3.7 **Substances Hazardous to Health**

3.7.1 As a responsible employer, Carroll Waste 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 Waste will follow the good practice guidelines produced by the Health and Safety Executive as follows:

- Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
- Take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures
- Control exposure by measures that are proportionate to the health risk
- Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
- Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
- Check and review regularly all elements of control measures for their continuing effectiveness
- 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
- Ensure that the introduction of control measures does not increase the overall risk to health and safety
- Dispose of substances hazardous to health in line with Material Safety Data Sheet Requirements
- Provide training for employees on hazard identification and handling

3.8 Management of Spills of Potential Pollutants

3.8.1 In line with its requirements under the Environmental Damage Regulations 2009, Carroll Waste will carry out risk assessments for all activities and locations where there is potential for materials used to cause environmental damage including:

- Pollution
- Serious damage to surface water or ground water sources
- Contamination of land where there is significant risk to human health
- Serious damage to natural habitats

3.8.2 The risk assessment will as a minimum seek to:

- Identify where and how materials are stored or handled that may be a hazard
- 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)
- Asses the likelihood and magnitude of any potential harmful effects
- Ensure suitable prevention measures are in place through effective site management procedures e.g. use of correct signage and secure storage of harmful materials

3.8.3 Where significant risks are identified, Carroll Waste will draw up a site-specific Incident Response Plan that will include:

- Contact details of the Carroll Waste operative that will act as a major incident coordinator
- Reporting requirements to the Environmental Agency for any major spill incidents that have potential to cause harm to people or the environment
- An outline of how the potential clean-up operation will be managed
- How any residues will be safely removed and disposed of
- Contact details for registered clean-up contractors, if required

3.8.4 In addition, Carroll Waste will provide training for staff whose roles and working environment increases the risks posed by major spill incidents, so they know:

- What they should / shouldn't do in the event of major spill
- Where they can access personal protective and pollution control equipment / materials
- Where they can access the site-specific incident response plan

3.9 Waste Transfer Station Operations

3.9.1 Carroll Waste operates a Waste Transfer Station (WTS) for the collection, sorting, screening, bailing, bulking and disposal of waste materials.

3.9.2 The WTS operates in accordance with the Statutory Guidance Note; SR2008 No 3 75kte: Household, Commercial and Industrial Waste Transfer Station with Treatment (existing permits).

3.9.3	Permitted wastes are limited to non-hazardous wastes and do not include hazardous wastes such as asbestos.
3.9.4	Carroll Waste will comply with the limit of total quantity of waste that can be accepted at a site of less than 75,000 tonnes a year, as required by the Standard Rules Permit SR2008 No3_75KTE.
3.9.5	This includes any specified waste, all bulking, transfer or treatment of non-hazardous waste that must be carried out inside a building. This includes wastes that can be bulked up for disposal or recovery elsewhere and can also be treated by sorting, separation, screening, bailing, shredding, crushing and compaction.
3.9.6	In compliance with the Rules (see 3.9.4 & 3.9.5 above), Carroll Waste will not the burn of any wastes, either in the open, inside buildings or in any form of incinerator.
3.9.7	<p>Carroll Waste will ensure that the WTS manages and operates the activities:</p> <ul style="list-style-type: none"> 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 the operator as a result of complaints; and b) Using sufficient competent persons and resources
3.10	Emissions and Monitoring
3.10.1	All liquids, in containers, whose emission to water or land which could cause pollution, will be provided with secondary containment or bunding or other form of protective measures to prevent or minimise leakage and spillage from the primary container. If Carroll Waste is advised that its activities are giving rise to pollution we will submit a Remediation Management Plan to the Environment Agency for approval.
3.11	Odour
3.11.1	Carroll Waste will ensure that any emissions from its waste processing activities are free from odour, at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, including, but not limited to, those specified in any approved Odour Management Plan, to prevent or where that is not practicable, to minimise the odour.
3.12	Noise
3.12.1	Carroll Waste will also ensure that its waste processing activities are free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration.
3.13	Records and Information
3.13.1	All records required to be made by these standard rules shall:

	<ul style="list-style-type: none"> • Be legible • Be made as soon as reasonably practicable • If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and • Be retained, unless otherwise agreed by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender: • Off-site environmental effects and matters which affect the condition of land and groundwater
3.13.2	<p>Carroll Waste will keep, on site, all records, plans and the management system required to be maintained by these standard rules, unless otherwise agreed in writing by the Environment Agency.</p>
3.14	<p>Reporting</p>
3.14.1	<p>Carroll Waste will send all reports and notifications in writing as required by the Environment Agency using the appropriate contact details as per the Standard Rules Permit SR2008 No3_75KTE.</p>
3.14.2	<p>At the end each quarter, Carroll Waste shall also submit to the Environment Agency (using an appropriate form) the information relating to the waste accepted and removed from its processing site during the previous quarter.</p>
3.15	<p>Notifications</p>
3.15.1	<p>Carroll Waste will comply with all notification requirements where it has been requested by the Environmental Agency to undertake monitoring and/ or sampling i.e.:</p> <ul style="list-style-type: none"> • Notifying the Environmental Agency without delay following the detection of: <ul style="list-style-type: none"> ○ Any malfunction, breakdown or failure of equipment, which has caused or may cause significant pollution ○ The breach of limit specified in these standard rules ○ Any significant adverse environmental effects • Informing the Environmental Agency at least 14 days before the date of monitoring is to be taken
4	Implementation
4.1	<p>All Carroll Waste employees have a responsibility for being aware of and implementing the Carroll Waste Environmental Management Policy.</p>
4.2	<p>The Health & 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>

5	Performance	
5.1	<p>The following performance indicators that underpin the operation of this Policy will be will be published quarterly in the Group Performance Management System:</p> <ul style="list-style-type: none"> • % reduction in electricity consumption in Carroll Waste offices • Achieve 90% for recycling of construction waste • % increase in the volume of wastepaper recycling year on year • % reduction in total carbon footprint (CO2) emissions from office and fleet use by 40% in comparison with the base year's data • % reduction in fuel use consumed by Carroll Waste vehicles 	
5.2	<p>The above targets will be reviewed and amended on an annual basis, based on actual performance.</p>	
6	Consultation	
6.1	<p>All Carroll Waste Staff have been consulted in the development of this Policy.</p>	
7	Review	
7.1	<p>The Policy will be reviewed once every three years from the date of the of Managing Director's approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to Carroll Waste working practices / as a result of system audits.</p>	
8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	No
8.2	When was EIA conducted and by who?	The EIA was conducted by the Policy Writer and Policy and Strategy Manager on 25 October 2016 for a related Policy and is still relevant for this Policy
8.3	Results of EIA	The EIA did not reveal any differential impacts on any of the people of groups with protected characteristics.
9	Scheme of Delegation	
9.1	Responsible officer for approving and monitoring implementation of the Policy and any amendments to it	Managing Director- Carroll Waste
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Managing Director- Carroll Waste

9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Managing Director- Carroll Waste	
10 Amendment Log			
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
Not Applicable - this is the first version of the Policy	Not applicable	See section 6	Not Applicable