

ENVIRONMENTAL POLICY STATEMENT



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ENVIRONMENTAL POLICY

Falcon Construction Projects Ltd “FCPL” provides construction and refurbishment services to the commercial, residential, retail and leisure industries. The company recognises the requirements for an Environmental Management System & Site Waste Management Plan and is committed to pursuing best environmental practice whenever and wherever practical. Furthermore, the Director is committed to imposing the regulations and systems on sub-contractors, suppliers and associated consultants whenever and wherever practical.

Our overall goal is to improve our environmental performance with efficient use of resources and reduction of waste. As FCPL growth plan and strategic direction it commits to gaining ISO 14001: 2015 by 2020. FCPL will therefore: -

- Regularly review its own energy, fuel and stationary usage and investigate ways in which to reduce consumption.
- Make efficient use of materials and minimise the waste generated from our contracts
- Minimising the amount of waste, we produce through effective design and on site management together with regularly reviewing its management of waste.
- Promote the improvement of activities carried out by sub-contractor’s, suppliers and associated consultants, which have an impact on the environment.
- Meet current legislative requirements and wherever possible, go beyond these requirements.
- Place great emphasis on planning and managing its contracts to protect and enhance the local environment and surroundings. We aim to make a positive contribution to the communities in which we work.
- Ensure that the natural habitat and environment is protected throughout the contracts
- Prevent pollution occurring at our sites
- Educate and train employees
- Educate and train Site Managers and ensure empowered to cascade to all site personnel

In line with these principles, FCPL has established the following objectives: -

- To save energy by recycling waste, reducing paper dependency, providing energy efficient mechanical and electrical fittings and managing energy consumption.
- Work with our clients and suppliers to achieve sustainable design solutions that offer energy efficiency, use renewable resources and use local and recycled materials where appropriate
- Develop and implement practices that prevent pollution and encourage responsible use of resources efficiently, minimize waste and recycle where possible and minimize the detrimental impacts that our activities could have upon the environment.
- To reduce fuel consumption by purchasing diesel cars and vans.
- To include clauses, wherever possible, in Tender and Contract documents prepared by FCPL, which impose compliance with site waste management regulations on sub-contractor's, suppliers and associated consultants.
- To continually seek information on technological advances and above all, be informed.
- To ensure our employees and subcontractors are aware of our environmental impacts and their role in managing them, particularly for potential instances of pollution during our projects.
- Source materials, plant and where possible services close to site. Contributing to a reduction of carbon footprint, fuel reduction and supporting local communities.

1. Introduction

Falcon Construction Projects Ltd “FCPL” recognises that our activities have an impact on the environment and that we have a responsibility to consider and minimise these impacts, where possible, throughout our activities.

Responsibility for environmental management rests with the Managing Director however all our employees are made aware of their duties under this policy.

This policy provides a structured approach to managing environmental issues and defines the Falcon Environmental Management System (EMS). This system has been developed to be simple and appropriate to the needs of the business, whilst acknowledging the principles of recognised standards, such as ISO14001.

2. Benefits of Environmental Management

Adopting an Environmental Management System is an important step in developing good environmental practice throughout the Company. Whilst ensuring Falcon minimises its impact on the environment, there are a number of other benefits from adopting good practice. These include:

- Prevention of damage to our natural environment.
- Fewer disturbances to neighbours and local communities.
- More efficient use of materials and reduced waste.
- Better relationships with regulators and other public bodies
- Less time and money spent repairing environmental damage.

3. Environmental Obligations

There are a number of environmental obligations to which the Company must adhere. These have both legislative and contractual origins and include:

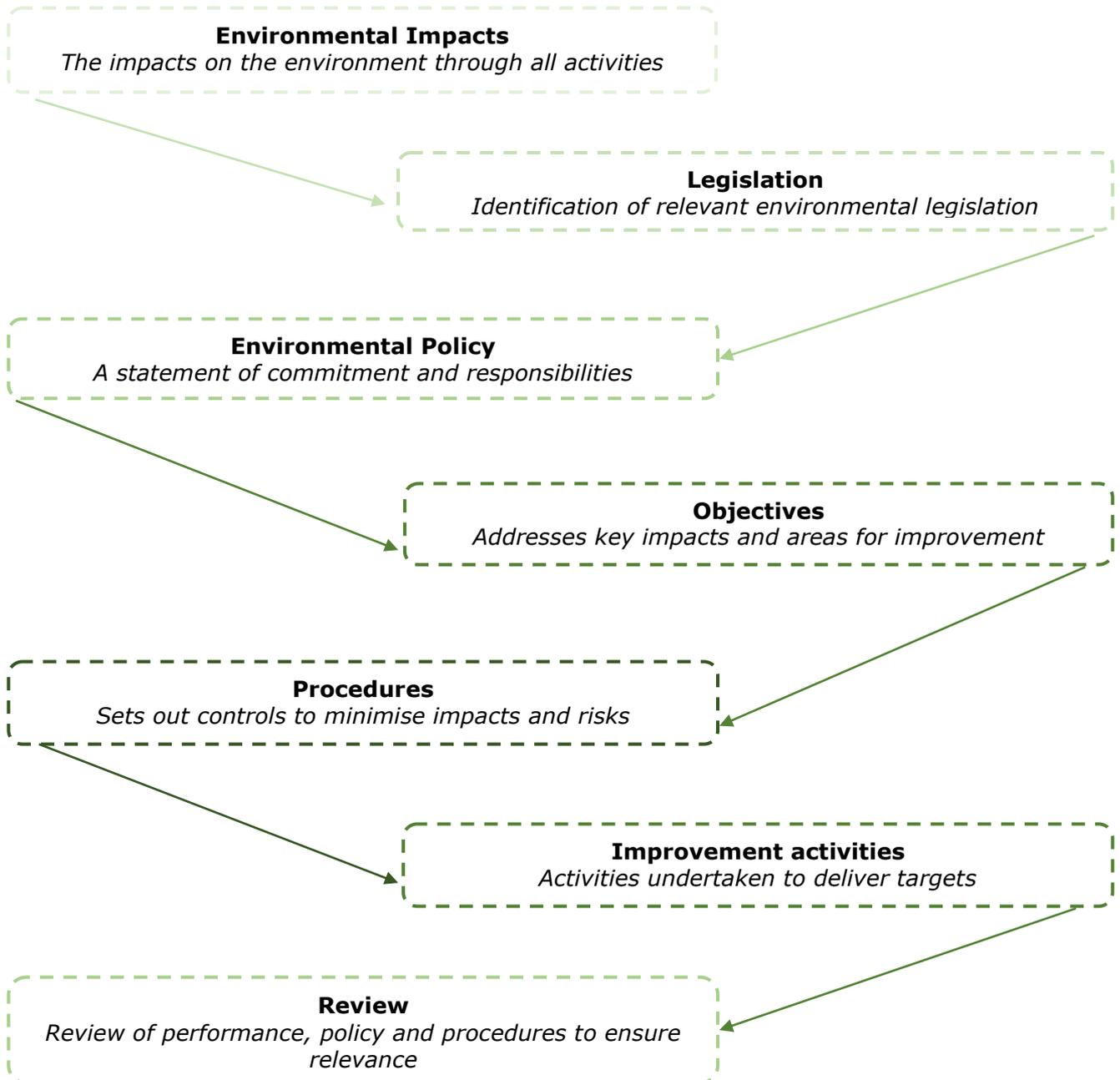
- Legislation and regulation, including the Environmental Protection (Duty of Care) regulations.
- Corporate control and governance
- Environmental conditions included within contracts and planning consents
- Requirements imposed by local authorities (e.g. under the planning acts)

Detailed information relating to relevant environmental legislation can be sought from Managing Director

4. Falcon Environmental Management System

Falcon Environmental Management System (EMS) covers all aspects of the companies work activities. It provides a practical framework within which environmental issues can be managed and the Company's environmental impacts minimised. This is described in the diagram below:

Diagram illustrating the elements of the Falcon EMS



5. Falcon Environmental Policy

The Falcon Environmental Policy was first established in November 2014 and has been approved by the Managing Director, being reviewed on an annual basis. This policy sets the principles behind all our environmental activity.

We have identified three main areas of priority where we intend, where practicable, to minimise our impacts. These priority areas are:

- Make efficient use of materials and minimise the waste generated from our projects;
- Prevent pollution occurring at our contracted works;
- Source locally

We will set objectives and targets, where appropriate, for our most significant impact areas and will monitor and review our performance against these. In addition, we will review our policy on a regular basis to ensure its relevance.

This policy is implemented and monitored by both the Managing Director and the Health and Safety Manager.

6. Responsibilities and Implementation

The Managing Director is responsible for establishing the Environmental Policy and Environmental Management System. The Managing Director is also responsible for the regular review and updating of policies and procedures.

The Managing Director will ensure that the guidance and procedures referenced in this policy are made available to all site staff, particularly to operatives.

For each project, the Health and Safety and Project Manager are responsible for ensuring that environmental practices on site are monitored. They are also responsible for liaising with the local regulatory authorities where necessary.

On each project, the operatives are responsible for the day to day management of environmental issues and ensuring that environmental procedures contained within this manual are implemented. These responsibilities are assigned as part of the workload of the operatives alongside quality assurance and health and safety.

All employees are expected to adhere to environmental procedures and guidance set out in this policy and to provide feedback and suggestions for improvements where appropriate.

7. Objectives

The Environmental policy is supported by objectives in our most significant environmental impact areas Falcon is responsible for setting and reviewing these objectives on an annual basis

Environmental performance is measured using a series of key performance indicators. These are developed and monitored on a regular basis

8. Review

Each element of the EMS requires a review over different timescales. The Managing Director is responsible for ensuring that each component is reviewed according to the table below.

Component	Frequency of review
Impacts	1 year or any significant changes in business
Policy	1 year
Objectives and targets	1 year
Procedures and guidance	1 year or in line with new legislation or guidance

9. Reporting on Performance

Environmental performance is reported annually between the Falcon Projects Managers and Managing Director.

10. Dealing with Regulatory Authorities

Regulatory bodies will include:

- Local Authority Environmental Health Officers
- Environment Agency
- Health and Safety Executive
- Country Commission for Wales
- English Nature
- County Archaeologist
- Scottish Natural Heritage

These bodies welcome an early approach and this should be considered a valuable investment of time and effort.

In case of emergency (e.g. a pollutant spill into a water system) the Site Manager /Operative will contact the Environment Agency immediately as part of the emergency procedures The incident hotline for the agency is **0800 807060**.

If other environmental issues should arise on site, the Operative must contact the Managing Director or Health and Safety Manager who will alert the Environment Agency or other appropriate body.

11. Significant Impacts and Guidance Information

The chart below outlines what we consider to be the most significant environmental impacts of FCPL.

Impact Area	Description of Impact
Air pollution	<ul style="list-style-type: none"> • Emissions from energy and fuel used in offices, vehicles and on site.
Archaeology	<ul style="list-style-type: none"> • Uncovering and/or disturbance of undiscovered archaeological remains.
Dust and Odours	<ul style="list-style-type: none"> • Dust created from demolition, crushing and excavation works; stock piling of loose materials (e.g. uncovered rubble); clearing top soil; drilling and mixing of dry powders. • Odours from vehicles left with engines running.
Ecology	<ul style="list-style-type: none"> • Inadvertent destruction of places inhabited by plants and animals. • Interruption of wildlife movements. • Removal of hedgerows and other vegetation. • Disturbance of wildlife (e.g., noise, vibration etc).
Energy and fuel use	<ul style="list-style-type: none"> • Energy used in offices for lighting, heating, and air conditioning • Motor Fleet fuel consumption • Energy and fuel used on site to power plant and machinery.
Demolition and ground contamination	<ul style="list-style-type: none"> • Disturbance of previously contaminated ground. • Windblown dust from loading vehicles or transportation. • Stockpiling of contaminated soil or earth. • Spillages of chemicals, diesel or oils. • Discharging of contaminated water into nearby watercourses.

Noise	<ul style="list-style-type: none"> • Loud noise generated from general operations, particularly pneumatic tools and demolition. • Irregular or tonal noises such as reversing warnings, vehicle movement radios, shouting etc.
Storage and use of fuel and chemicals	<ul style="list-style-type: none"> • Use and storage of fuel, oils, solvents, paints, varnishes and other chemicals. • Pollution of watercourse through spillage, mishandling or poor storage.
Suppliers	<ul style="list-style-type: none"> • Indirect impact on the environment through the behaviour of suppliers who source or manufacture the products we use.
Transport and traffic management	<ul style="list-style-type: none"> • Emissions from company car and vehicle fleet. • Indirect emissions from supplier's vehicle delivering materials.
Vibration	<ul style="list-style-type: none"> • Excessive vibration caused by demolition activities. • Low level vibration caused by site plant and equipment.
Waste and materials	<ul style="list-style-type: none"> • General office waste. • Waste generated on site from materials and their associated packaging. • Demolition waste created on site.
Water Pollution	<ul style="list-style-type: none"> • Spillage of chemicals, diesel and other oils. • Run-off from disturbed ground into watercourses. • Direct disturbance or alteration of watercourses through works. • Pollution of watercourse through equipment washing
Water use	<ul style="list-style-type: none"> • Water used at offices in kitchens, washrooms. • Water used on site during works

12. FSC Procurement.

FCPL is committed to the sourcing of forest products. Our long-term intention is that all timber and paper used in the products that we have purchased or source are provided by well-managed forests that have been certified by credible certification standards and/or recycled sources. It is our intention to build on this commitment and ensure we have an auditable chain of custody.

Labelling

Products purchased should carry an FSC or equivalent label whenever possible. The label should be applied under a valid chain of custody in line with requirements of the certification scheme.

Alternatives

Timber or paper from other certified sources with a complete chain of custody, will be accepted in situations where a particular type of product or timber species is needed, criteria of FSC should be echoed during this type of procurement.

If independently certified timber or paper proves to be unavailable, we will accept but as a last resort. Timber/paper that can be supplied with category B evidence as detailed under *the UK Government Timber Procurement Policy*.

13. Waste Management and Recycling

FCPL policy on waste management and recycling is to primarily reduce the amount of waste produced on each and every project, to maximise recycling and as a result reduce to a minimum the amount of waste sent to land fill.

14. Waste Management Contractors

Due to the requirement for accurate reporting of all our waste transactions, only reputable waste management contractors will be used who have a proven track record in waste management and who have access to licensed facilities for disposal and recycling. The Waste Management Contractors chosen must be able to report to FCPL on demand with details of the following: -

- Number of skips used for each waste category
- Equivalent tonnage from each site for each waste category
- Cost per skip/ waste category
- Total Cost per site
- Recycled quantities
- Landfill quantities

They must also be able to provide to FCPL on demand a schedule of the quantities of material that have actually been recycled or sent to landfill. If waste material has been recycled the waste management contractor must provide details of what use the material has been put to for each of the categories noted above.

15. Environmental Incidents and Emergency Procedures

It is essential that all employees are aware of environmental incident procedures on a site and that these are adhered to. Environmental incidents must be reported on the Environmental Incident Report Form. This is particularly important in the case of pollution incidents and where quick and effective action can significantly reduced the damage that

such an event may cause, as well as minimise the costs and impacts associated with the subsequent clear up operations.

In the case of an environmental incident occurring the Managing Director or Health and Safety Manager must be informed within 24 hours.

16. Reporting and Documentation

All of the following is retained, scanned and saved on FCPL server –

- Waste Transfer Notes and Special Waste Consignment Notes
- Copies of the Carriers Licence for all carriers used
- Copies of the Waste Management Licences (or exemptions) for all destinations of waste
- Details of abandoned or damaged waste containers.

17. Environmental Working Procedures

17.1 Waste Containers

All skips and containers will be provided by and managed by FCPL Site Management where possible with site size in mind, labelled (waste type) and colour coded skips and containers will be used.

Material	Colour
Scrap Metal/Cables	Black
Wood	Brown
Plasterboard	Yellow
Plastic	Blue
Cardboard	Green
Food	Red
Non-Recyclables	Orange

Each Team Supervisor/member of staff is to be responsible for collecting empty containers from the designated Waste Collection Point and returning their filled containers to the recycling point.

Types of container include:

- Bags
- Wheelie bins
- Mini skips
- Skips
- Front/rear end loaders
- Compactors/balers
- Mobile crushers/shredders
- Bulk

17.2 Waste Segregation and Storage on Site

Staff are to be responsible for the control and management of their waste including correctly segregating waste and placing it into the allocated containers. All waste must be stored within allocated containers in designated areas and away from surface water drains.

Staff are to pay particular care to the segregation and correct, safe storage of 'special' or 'hazardous' wastes.

17.3 Special /Hazardous Waste

The term 'Hazardous Waste' or 'Special Waste' is given to waste that is hazardous or difficult to handle. Examples of hazardous/special waste include: oil, paint, adhesives, solvents, batteries, asbestos and chemicals. The rules that apply to the storage and disposal of hazardous/special waste are more stringent than those applying to 'normal' waste.

All hazardous/special waste to be disposed of by the appointed specialist contractor and is to be accompanied by a COSHH material safety data sheet.

Where plant maintenance is carried out on site, used oil shall be stored in a bunded area for collection. Oil and fuel filters should also be stored in a designated bin in a bunded area for separate collection and recycling. Used oil and filters are designated as hazardous/special waste.

The discovery of any medical waste, and hypodermic needles that may have been in contact with body fluids found on site must be reported to the Main Contractor who will then arrange for safe and legal disposal to the appropriate facility. Highly flammable waste must be stored separately in appropriate containers and fire fighting equipment must be provided by the relevant contractor.

17.4 Waste Disposal

FCPL employees are to move the filled waste containers to the designated Waste Compound Area. Upon arrival at the Waste Compound, the site manager will check the containers to ensure the waste contained within is suitably segregated and the container itself remains in good condition.

Where waste is not adequately segregated, the site manager is authorised to instruct the employees/ contractors to properly segregate the waste or dispose of the waste as general waste.

17.5 Site Housekeeping and 'Orphaned' Waste

Each member of staff is responsible for maintaining a clean and tidy working area. This includes the prompt removal of waste and other debris. Particular attention should be paid to access and egress routes such as doorways, corridors, stairs, and pedestrian and traffic routes through the site.

The site manager is responsible for periodically monitoring the general state of the site working area for waste management and safety purposes. Where the manager identifies waste that is unsuitably stored for either environmental or safety reasons, he shall document the area and issue a non-compliance notice to the responsible staff.

17.6 Waste Compound

A designated area of the site (waste compound) will be provided for the storage of skips, location of management facilities and equipment. This area will be operated and managed by the site manager.

FCPL shall supply all skips and waste containers for the segregation and storage of waste within the central Waste Management Compound.

FCPL shall be responsible for the correct storage and control of waste located within the Waste Compound to ensure environmental pollution is prevented.

The waste contained within the Waste Compound will be segregated, as a minimum, into the following material types for reuse or recycling wherever possible:

- Timber
- Pallets
- Plastic
- Cardboard
- Office Paper (for site offices/ head office only)
- Hard-core
- Scrap Metal & Cable
- Non-Recyclable Waste
- Special Waste (empty containers)
- Container A Flammables; paints, solvents, epoxy resins
- Container B Oily Waste
- Plasterboard
- Brick/Block