David Smith Contractors Ltd
Civil & Demolition Contractors

Environmental Management Policy Procedure

Title:	**Environmental Management Policy Procedure**
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Approved By:	**Commercial Director**

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Amendment Record

Note: only person named in 'Controlled By' field above is authorised to make any amendments or updates to this document.

Date Updated	Description of Change

Name:	**David Smith**
Position:	**Managing Director**
Signature:	*David Smith*
Date:	30/01/2026

Summary / Purpose

The purpose of this policy is to outline the responsibilities associated with the company's Environmental Management System (EMS) and Environmental compliance.

Scope

The scope of this Policy covers the responsibilities associated with the company's EMS and applies to all employees across the organisation.

Applicability

This policy applies to all personnel involved with any activities covered by the above scope.
Unless otherwise stated, the processes, procedures and instructions outlined in this policy must be followed and failure to follow this policy could lead to disciplinary action.
Sections marked ***'Guidance'*** are included as guidance and strict adherence is not required.

Policy

Our company has an Environmental Management System (EMS) in place which forms part of an Integrated Management System (**IMS**). The EMS follows the international standard ISO 14001 and formally states how we commit to protect the environment and stay legally compliant. All the company's activities, staff and contractors are covered by the its EMS and have to comply with it.

Your responsibilities

All staff and contractors working for or under the management of the company are responsible to:

- Be aware of the Environmental Policy.
- Be aware of our Environmental Objectives and Targets.
- Follow the Environmental guidance issued.
- Report any issues to the Environmental Representative or Line Manager.
- Come forward with any suggestions for improvements to environmental performance.
- Report any environmental concerns or incidents including spillages.

Sustainability and Environmental Commitment

In addition to any current environmental objectives we are committed to the following environmental and sustainability objectives;

- Review and reduce the environmental impacts of our operations
- Increase employee environmental awareness and provide suitable training
- Protect the environment, through pollution prevention and effective emergency response
- Ensuring the company is a good neighbour
- Recycle materials wherever possible and minimise waste
- Comply with all planning permission and license requirements

Management, staff and employees are encouraged to liaise and work closely with suppliers, sub-contractors, regulators and customers to ensure we meet and exceed all regulatory requirements and other applicable requirements.

Environmental Legal Compliance and Updates

The company will keep up to date with environmental legislation and have subscribed for updates from 3rd party update services to ensure we remain compliant with all environmental legislation. All staff should be familiar with current legislation that is applicable to their duties.

Monitoring of Environmental Impacts

We have reviewed and identified the operations of the business which have the potential to have a significant impact on the environment and these impacts will be monitored and communicated to all relevant staff.

In reviewing environmental impacts we also take a 'Life Cycle' perspective to consider how environmental performance could be improved by considering if there are improvements that could be made beyond those directly relating to our operational activities such as improvements that could be made by other interested parties such as suppliers or customers and whether these interested parties could be influenced to achieve improvement. The life cycle perspective involves consideration from the very start (upstream) such as how raw materials required are extracted or energy generated right through to (downstream) final end of life disposal.

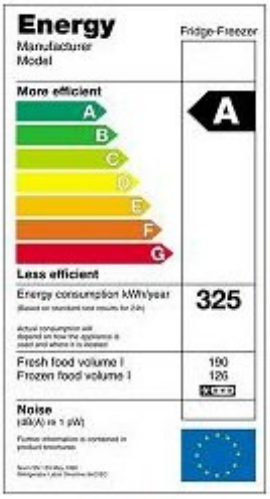
All staff should be aware of this approach so that they can assist with controlling our environmental impact both within the company and up and down our supply chain where practicable.

Polluting materials include things we can clearly identify as harmful, such as chemicals, pesticides, oils, sewage and animal slurries. But many things we don't see as harmful can still have a devastating effect on the environment. E.g. beverages, food products, detergents, dairy products, paint and ink.

The environmental impacts can include:

- Closure of public water supplies.
- Damage to wetland habitats, fisheries and river ecosystem.
- Groundwater contamination.
- Land contamination.
- Impacts on human health from air pollution.

These impacts can be immediate and long lasting, but sometimes the effect can take longer to be recognised, especially if groundwater has been polluted.



Reducing Office Energy Use and Environmental Impact

There's lots of simple ways to help reduce our energy use and impact on the environment;

- Switch off lights and equipment when not in use
- Use the recycling facilities provided
- Always think before you buy- do I really need it?
- Only print, when necessary, print double sided where possible
- Buy energy efficiency equipment - IT, lighting and Kitchen appliances - check for energy efficiency rating when purchasing or specifying
- Try to cut out or eliminate unnecessary journeys
- Only boil the water you need.
- Switch off heating or air conditioning when not in use.

Noise, Nuisance and Complaints

Our business also has a responsibility to our local environment our neighbours and we need to ensure our operations do not impact on our local area.

- Follow all site guidelines
- Provide the name and number of the site manager if there is a public complaint about noise

Environmental Awareness / Environmental Training

Environmental awareness training is provided to all workers on an ongoing basis and during induction of new workers. The training will cover significant environmental aspects and their associated impacts, and planned emergency responses.

Environmental Incident Prevention & Management

All relevant workers will be given training to ensure they know how to prevent and respond to environmental incidents. Oils and chemicals will be stored in a responsible way to reduce any potential environmental incidents and emergency situations and comply with relevant legislation.

Emergency Response Procedures

Emergency response procedures will be available to all staff covering potential emergency situations detailing actions to be taken and emergency equipment. Following the occurrence of an emergency, the effectiveness of the arrangements and response will be reviewed.

Emergency response actions (e.g. fire drill, oil spill) and arrangements will be checked and tested during ongoing site inspections as detailed in **IMS1 - 6.3 Environmental Incident Prevention & Management.**

Spill Response

In case of and environmental incident with spillage of oil or chemicals following general rules will be followed:

- **NEVER** wash any oil or chemical spills down a drain.
- Respond promptly.
- Wear any required PPE (e.g. glasses / gloves).
- Stop the leak if possible (e.g. with putty sticks).
- Use the spill kit provided.
- Seal off drains, if possible.
- Dispose of contaminated materials as special waste.
- Report all spills or near misses to your line manager.
- Complete any paperwork required.

For large spills or those which have entered a surface water drain or water course it may be necessary to contact and inform relevant environmental agency

Significant spills should be logged as a problem as per **IMS1 - 5.2 Control of Nonconforming Outputs, Problems and Complaints.**

Control of Substances Hazardous to Health (COSHH)

The company is required to meet legal obligations when it comes to dealing with substances that are hazardous to health.

Hazardous substances can take many forms and include; chemicals, products containing chemicals, fumes, dusts, vapours, mists, nanotechnology, gases and asphyxiating gases and biological agents (germs).

All COSHH will be identified and following control measures put in place to prevent harm to health;

- COSHH assessment completed for all hazardous substances.
- COSHH assessment / relevant Safety Data Sheets made available prior to use.
- No one to be exposed to hazardous substances without being aware of it.
- Materials are stored in a secure location & in a manner that avoids damage after use.
- All materials used are in date.
- Personal Protective Equipment (PPE) is provided and used as required.

Relevant Emergency Procedures are reviewed prior to use and it is ensured all necessary equipment for emergency situations are available.

All hazardous substances used by the company or stored on the premises must be identified and a full COSHH assessment completed. All COSHH will be listed on the COSHH register which will also detail all relevant material safety data sheets held.

Oil and Chemical Storage

Oils and hazardous chemicals will be properly stored in a responsible way by:

- Storing hazardous substances according to the manufacturer's instructions / COSHH sheets
- Labelling containers clearly and accurately
- Storing spill kits or other appropriate pollution prevention equipment (such as drainage covers, or granules), beside oil and hazardous chemical storage
- Storing incompatible substances separately, e.g. chemicals that may react with each other
- Storing all above-ground storage tanks, drums and containers on an impermeable base within a drip tray, bund or any other suitable secondary containment system to contain any spills (where possible)
- Installing drip trays, or other forms of containment, beneath any equipment that is likely to leak or result in spills of pollutants, and emptying drip trays regularly so that they do not overflow
- Keeping the site secure as the company may be liable for pollution that occurs as a result of damage caused by intruders
- Ensuring all interceptors and containment tanks are regularly cleaned and maintained as required, to ensure no oil, silt or other substances can enter surface waters

All hazardous substances will be stored in accordance with storage requirements detailed on the relevant COSHH assessment.

Where possible COSHH should be stored in designated COSHH cabinet.

Use of COSHH

COSHH can only be used by competent staff using all necessary PPE and with other emergency equipment in place as specified on the COSHH assessment.

COSHH assessments, COSHH register, relevant safety data sheet and all necessary safety equipment will be made available to staff using COSHH.

No liquids or other substances used by the company should be poured down drains or into a watercourse.

The company will ensure all employees and stakeholders working with oil and chemicals:

- Know where spill kits are located.
- Store oils and chemicals in the secure bunded facilities provided.
- Never refuel near a drain or watercourse.
- Use any drip trays provided.
- Always store liquids away from drains and watercourses.
- Store oil and chemicals away from traffic routes.
- Do not store oils and chemicals on unmade ground.
- Keep all valves, pipes etc within the bund.

This policy outlines the company's commitment on dealing with and preventing chemical spills. Since even a small quantity of oil or chemicals can kill aquatic life, controls are implemented to prevent spills going into drains or unmade ground where it can affect a water course or the ground water.

This is foremost to protect the environment. However also to comply with the laws in place to protect land, water, air, wildlife and people from pollution.

Not following these laws is committing an offence which could lead to penalties, fines, imprisonment, stop-work notices and having to pay clean-up costs, along with damage to our reputation.

Waste Management Procedure

The Company is legally responsible for all of its waste. Where possible we want to maximise recycling by separating any recyclable material for separate collection i.e. glass, metal, cardboard, paper and plastic should be segregated and recycled.

- **Waste Storage** - All waste will be stored correctly to prevent leakage or contamination. Waste will be uplifted promptly.
- **Recycling** - All waste streams must be segregated and recycled where collection facilities for separated waste streams are available.
- **Hazardous Waste** - Hazardous waste onsite (e.g. batteries) cannot be disposed of in general waste skips or bins, and must not be stored onsite for more than a year, or stored in large quantities.

  All hazardous waste must be:

  - - Transported by a registered waste carrier;
  - - Accompanied by a consignment note;
  - - Sent to an approved facility
  - - Consignment notes must be kept for 3 years

Guidance

Ensure Staff have been given training / guidance and are aware of how to correctly store oil and hazardous substances.

Check that spill kits are located throughout site, especially in areas where they may be required, and are being regularly checked.

Check that COSHH assessments / Material Safety Datasheets available for all hazardous substances.