

**Environmental and Sustainability Policy Handbook**

## 1. Policy Statement

This Environmental and Sustainability Policy Handbook provides practical examples of how we all can contribute to delivering a more sustainable company. It provides comprehensive advice on a range of important topics in an easy to digest pocket guide that covers areas such as waste management, pollution control, working with chemicals, water management, carbon reduction and biodiversity.

This guide will enable you to understand where you can contribute and, importantly, take individual and collective action to reduce the demands we place on our environment.

**1.2 Roles & Responsibilities**

Every employee is responsible for being as sustainable and environmentally friendly as possible.

Take a moment to think... **could you do your job in a more environmental and sustainable way?**

**Responsibility of Employer**

MM Band Services Ltd has a legal responsibility for the impact its activities has on the environment. Ensuring compliance with environmental legislation and preventing environmental incidents.

**Responsibility of Employee**

**Duty of Care**

Prevent fly tipping – producers of waste must ensure it remains under control, passed to a registered waster carrier, accompanied by a full description.

We all have a legal responsibility to ensure environmental compliance and will aim to go beyond this. There are many legal requirements which we must comply with which effect every aspect of our business. This guide identifies the key areas of legislation.

**2. Waste Management – Reduce, Re-Use, Recycle**

**REDUCE**

* Buy in bulk. It will reduce your packaging waste.
* Buy only what you need. You should control stock and look to streamline processes across departments.
* Think before you throw. Someone else may want to use it.
* Where possible set your printers to print double sided by default.
* When buying equipment consider the product’s durability or lifespan.
* Replacing equipment less often will reduce the waste you create.

**RE-USE**

* Refill toner and ink-jet cartridges.
* Use waste paper as notepaper.
* Use durable cups, mugs, glasses and cutlery rather than disposable alternatives.
* Envelopes.
* Packaging from deliveries.

**RECYCLE**

* Paper
* Printer Cartridges
* Old PPE
* Metal
* Wood
* Plastic
* Electrical Equipment (WEEE)

**Linear vs Circular Economy**

In linear economy, raw natural resources are taken and manufactured into goods that are sold, used and turned into waste that has been discarded.

In a circular economy we design out waste. This means looking at alternatives such as composting, reusing, remanufacturing and recycling.

**Best Practice**

**DO**

* Take waste seriously and identify the true cost of waste and the real value of resource efficiency.
* Think about how you can better contribute to waste minimisation and management on site.
* Adopt good and best practice for waste minimisation and management on site.
* Educate yourself and your staff to think about how they can reduce waste and increase profit through resource efficiency.
* Segregate wastes and use the appropriate containers.
* Minimise waste production.
* Ensure good housekeeping when segregating waste.

**DON’T**

* Allow your waste to be removed by an unlicensed waster carrier.
* Mix hazardous waste with non-hazardous or inert wastes.
* Leave materials that are easily damaged out in the rain or in a muddy area.
* Over order materials that you don’t need.
* Put liquid waste into skips.

**Legal Duties**

**If you have waste, you have a legal ‘Duty of Care’ to manage that waste appropriately. The Duty of Care applies to everyone involved in handling the waste, from the person who produces it to the person who finally disposes of or recovers it.**

The most relevant waste legislation is Environmental Protection Act (EPA) 1990 Part II, this legislation includes a “Duty of Care” for all those producing or dealing with waste.

**Reasonable steps must be taken to:**

* prevent the illegal disposal,treatment and storage of waste
* prevent waste escaping both during storage and transit
* ensure the carriers of controlled waste are registered with your environmental regulator
* provide written descriptions of your waste.

**Storing Waste**

**Ensure you:**

* store it securely in appropriate waste containers, such as skips or labelled drums
* cover waste material if necessary to prevent it blowing away
* make sure that waste cannot leak into the ground or watercourses.
* consider whether different types of waste need to be separated
* do not mix different types of hazardous waste
* do not mix hazardous waste with non-hazardous waste or with materials that arenot waste.

**Who does what?**

* **Waste Producers:** Anyone doing any work that creates waste must make sure that waste is safely contained in the right skip or container.
* **Waste Brokers:** Subcontractors who make arrangements for the disposal of waste. They are responsible for making sure the waste transfer is legal, the waste is properly contained so that it cannot escape during transfer, and the transfer is documented on a waste transfer note. Some of these duties such as completing a waste transfer note may be delegated to the waste producer.
* **Waste Carriers:** Those taking the waste away must have a valid certificate of registration.
* **Waste Managers:** The company that receives waste (e.g. transfer station or landfill site) must hold a waste management licence which covers the types of waste being disposed.

**Documentation**

**Waste Transfer Notes (WTN)**

A WTN is a document that details the transfer of waste from one person to another. Every transfer of waste must be covered by  
a WTN. There is no standard WTN, many waste carriers produce their own versions.

A WTN shows carriers and site operators who handles your waste and what they are dealing with so that they can manage it safely and legally. WTN’s also ensure there is a clear audit trail from when the waste is produced until it is disposed of.

**A WTN must be completed and signed by both the person sending the waste and the person collecting it.** It must contain enough information about the waste so it can be handled safely and either recovered or disposed of legally. It must include an accurate description of the waste and any processes the waste has been through. If you don’t give enough information and your waste is mismanaged as a result, you could be prosecuted.

**Waste Carriers Licences**

**If you want to transport controlled waste in England and Wales as part of the business or with a view to profit, you need to carry the business’ waste carrier licence.**

**How to dispose of waste**

**General waste**

• You must ensure that anyone who handles your waste has the correct permit, licence or exemption.

**People who collect your waste include:**

• waste contractors  
• scrap metal merchants • recycling businesses  
• your local council  
• skip hire businesses.

**If you transport your own waste you can pass it to:**

• waste transfer stations  
• waste treatment and disposal sites.

**Anyone who collects and transports your waste must:**

• be a registered carrier of controlled waste or

• be exempt from registration as a carrier. This includes your local council’s waste collection services.

If you cannot reduce or reuse your waste then recycle. You must arrange for the recycling or treatment of certain products, such as batteries and electrical and electronic equipment.

Disposing of waste should be a last resort after reusing or recycling. Make sure the waste site used to dispose of waste is authorised to handle your waste type.

**Waste Electrical and Electronic Equipment (WEEE)**

**Waste Electrical and Electronic Equipment Regulations aim to reduce the amount of waste going to landfill and improve recovery and recycling rates.**

All businesses that use electrical and electronic equipment (EEE) must comply with Waste Electrical and Electronic Equipment (WEEE) Regulations.

WEEE must be stored, collected, treated, reused, recovered or disposed of separately from any other waste your business produces.

WEEE can be returned free of charge to the manufacturer of the equipment if it was sold to you new after 13th August 2005. If you are replacing WEEE produced before 13th August 2005 with new equivalent EEE, you can return the WEEE free of charge to the manufacturer of your new equipment.

**The Waste Hierarchy**

**The waste hierarchy is a guide to sustainable waste management and a legal requirement. It ranks options for waste management.**

Priority goes to preventing the creation of waste, followed by preparing waste for reuse; to recycling, and then recovery. Disposal – in landfill for example – is regarded as the  
worst option.

We have increased our rates of recovery and recycling and generated much more energy from waste. Our focus is on moving up the waste hierarchy, to minimise the amount of waste we produce by improving our resource efficiency and keeping products in circulation longer so that they do not become waste.

**3. Environmental Pollution Control**

Businesses and individuals are responsible for complying with environmental legislation and preventing the pollution of air, land and water. Causing an incident is an offence and can result in prosecution as well as environmental damage.

It is an offence to knowingly or accidentally pollute any controlled waters, breach Waste Duty of Care requirements and interfere with any protected species. All these offences can lead to prosecution or hefty fines from the environmental regulator.

Most incidents can be avoided if a few simple rules are followed on site...

**PREVENTING ENVIRONMENTAL INCIDENTS AND SPILLAGES**

* Store chemicals and oils away from surface water drains.
* Don’t pour anything down the drain.
* Don’t leave lids off solvents and paints.
* Don’t store chemicals on unmade ground or in areas other than designated storage.
* Don’t connect any process into surface water drains.

**Dealing with environmental incidents and spillages**

* Report any environmental incident or spillage immediately.
* Know the location of nearest available spill kit.
* Know your sites individual spill response procedures.
* Natural features such as opened ground or watercourses should be protected from spillages.
* All waste or contaminated materials should be stored safely and in a secure manner to prevent it from escaping.
* Spills should not be flushed down drains or into watercourses. Spills should be absorbed using suitable material and disposed of properly.
* Vegetation should be protected against smothering from dust emissions.

A Spill Kit can mean the difference between an “incident” and a “disaster”. A properly stocked, maintained and deployed Spill Kit can protect our natural resources and save the company from fines, clean-up costs and damage to our reputation.

**BEST PRACTICE**

* The effects of an incident may not be visible on site but may appear some distance away. Remember  
  to be aware of your local surroundings and the potential consequences a spill could have in the wider environment.
* Keepaninventoryofthechemicalsyouhaveonsite,and details of when you received them and when you should dispose of them if you don’t use them up. This will help you to avoid having more chemicals than you need, and therefore reducing your risk of having a spillage.
* Reduce your chemical waste – only buy the amount of a chemical you need.

**Identifying spills**

Pollutants cover a large range of liquids, powders and materials (dirty brown water at one end of the scale through to commonly known pollutants such as oils etc).

**Minor and Major Spills**

**MINOR SPILLS**

Small amounts of material on land that do not pose an immediate threat to surface water or ground water.

**MAJOR SPILLS**

Any volume of material that may pose a threat to surface water or groundwater, for example near drains or streams, or spills to permeable surfaces such as grass.

**Environmental Incidents and Emergencies that must be reported include:**

Spills or unintended, significant discharges to the atmosphere, water supplies, sewerage systems, rivers and other watercourses, or to the ground of:

• any chemical product or formulation • oils and fuels  
• effluents  
• fumes and gases  
• contaminated materials e.g. Asbestos.

**Or damage to existing:**

* trees
* fauna and flora (protected, including the discovery of a protected species)
* local habitats (protected, including the discovery of a protected habitat)
* archaeology (including the discovery of)
* or, any environmental incident that could lead to Local Authority or Regulatory Enforcement, Public Complaint or Media Interest.

**Fuels, Oils and Chemicals**

**Working with oils**

When possible, do not store oil within 10 metres of a watercourse or within 50 metres of a well or borehole. If you have **one** oil storage container in a bund, your bund must be able to hold **110% of its volume**. If you have **more than one** container in a bund, the bund must be able to hold whichever of the following is greater:

* **25% of the total** volume of the containers
* **110%** of the largest container’s volume.

**Best Practice**

**DO**

* Store oil containers within a drip tray, bund or any other suitable secondary containment system – this helps to contain any oil that escapes from its container.
* Water removed from bund may be contaminated with oil – treat this as hazardous/special waste. If the water is not hazardous/special waste, this must be disposed of in accordance with your duty of care obligations.

**DON’T**

* Discharge rainwater that accumulates in bunds to public sewers, surface waters or groundwater without consulting your local Environmental Manager.
* Allow oil to enter drains; it has the same effect as pouring it directly into the watercourse as many drains lead directly to rivers, streams or lakes. Oil is poisonous to fish and other wildlife and it smothers plants.

**4. Working with Chemicals**

**Storing Chemicals**

**CHEMICALS YOU MAY STORE INCLUDE**

* Cleaning Products
* Fertilisers
* Pesticides and Biocides
* Insecticides and Rodenticides
* Solvents, e.g. Methanol, Benzene, Toluene
* Acids and Alkalis • Resins, Glues and
* Sealants
* Plasticisers
* Paints and Varnishes • Bleaches and Dyes

Store all chemicals in an area where you can contain spills.  
This should be within a secondary containment system such as:

an impermeable bunded area.  
on a bunded pallet or spill pallet.  
in a sump pallet.  
a bunded storage unit.  
a bunded drum store.  
a storage cabinet with an integral sump in a drip tray.

**BEST PRACTICE**

* Ensure the bund or drip tray is big enough to contain any spills.
* Ensure drip trays or bunded shelves are made of suitable material for the chemical you are storing.
* Keep double-wrapped or bagged chemicals in trays.
* Keep chemicals from the same batch together in the same storage tray.
* Keep an inventory of chemicals you have on site, and details of when you received them and when you should dispose of them when you don’t use them. This helps avoid having more chemicals than needed and therefore reducing your waste.
* All incompatible chemicals are segregated. If you store incompatible chemicals together, it could cause a violent reaction.
* Chemicals are locked away in lockable storage units if possible when they are not in use. The business can be prosecuted for a pollution incident that originates on site even if it was caused by vandals.
* Ensure chemicals or their storage containers are correctly labelled so that others can see clearly what is contained inside. E.g. Flammable, Hazardous, Toxic etc.

**Storing Flammable Chemicals**

* Store and transport all waste chemicals in suitable, sealed containers such as drums.
* Store and transport waste chemical containers and other packaging in covered containers, such as drums, cages or covered skips.

**5. Water and Wastewater Management**

**Wastewater Management**

It is vital to manage and control water properly on site to protect the environment. If watercourses are polluted, or unacceptable wastes are disposed of to the sewer system, then the environmental regulators have the powers to prosecute, using the ‘Polluter Pays Principle’. Private claims for damage may also occur where a water abstraction supply is interrupted due to pollution.

**Key causes of pollution include:**

* spills or leaks from oil and chemical containers
* the discharging of trade effluent into surface water drains instead of foul water drains, or straight into watercourses
* extraction of too much water from surface waters and groundwater
* run-off of fertilisers and pesticides from farming into watercourses
* other substances such as milk that pose no risk to human health but can cause serious disruption if they reach the water environment.

**BEST PRACTICE**

Good practice measures for preventing surface and ground water pollution and minimising water consumption include:

* development of a dedicated fuel storage area that is appropriately concreted and bunded
* use of approved double skinned self-bunded fuel bowsers for refuelling of plant where use of dedicated refuelling area is impractical.
* provision of ‘spill kits’, sand or other suitable containment and absorbent materials
* consents to discharge to fouls ewer/surface water dykes
* consent for discharge and/or abstraction from controlled waters from your environmental regulators
* marking of drainage points to differentiate foul (red) and surface water (blue) drains in line with environmental regulators’ recommendations
* in order to minimise water consumption, site toilets and washing facilities should be equipped with low flush toilets, automatic shut off taps etc
* hosepipes and other water using devices should be switched off when not in use
* rainwater storage tanks can be used for on-site grey water usage where space permits.

The site does not need to be next to a river to cause a problem. Any pollutants getting into surface water drain  
or groundwater can end up in a river even if it is a long way away. The environmental regulators will be able to trace these pollutants back to their source.

Spillages can easily be noticed and will be reported to the authorities by the general public. For example, a gallon of  
oil can cover an area the size of two football pitches. It does not take much to cause a problem – for example, the normal limits set by the environmental regulators for suspended solids are typically 30-40mg/l, which is equivalent to mixing half a tablespoon of soil in a bath of water. Discharge consents

must be obtained from the relevant body for all discharges into watercourses.

**Water Resource Management**

It is almost impossible to save water if you do not know how much you are using, where and when it is being used and where your best opportunities for water savings exist.

**To avoid any water being wasted:**

* monitor and measure water usage – install sub meters
* fit occupancy controls if you have urinals flushing round the clock
* avoid overconsumption of water during wash downs and use manual spray guns to control use
* reuse water for washdowns
* locate and cure any leaks
* consider effluent being economically treated on site to reduce disposal charges.

**6. Noise, Dust and Vibration Control**

**Statutory Nuisance**

**A STATUTORY NUISANCE CAN BE CAUSED BY**

* Noise and Vibration
* Smoke
* Smell Fumes
* Gases
* Dust
* Foul, stagnant or obstructed water
* Steam
* Smell
* Vermin
* Waste Disposals
* The poor state of your premises

**Avoiding Nuisances – Good Practice**

* It is in the best interest of MM Band Services to maintain good relations with the local community.

**To avoid legal action being taken against the business, ensure that business activities are not:**

* damaging to people’s health
* preventing, or interfering with, people’s rightful use and enjoyment of land
* interfering with public space and public land.

**To avoid causing a nuisance you should:**

* regularly check your site for any waste or evidence of vermin, noise or smell
* check noise, odours and other emissions near the boundary of your site during different operating conditions and at different times of the day
* maintain a good level of housekeeping on site
* be aware of the need to avoid creating a nuisance.

**Noise and Vibration Nuisances – How to avoid:**

* avoid or minimise noisy activities, especially at night
* where possible, schedule or restrict noisy activities to the normal working day
* identify areas where noise may cause a nuisance and locate noisy activities away from these areas
* position noisy equipment away from site boundaries, existing buildings can be used to shield the noise source.

**How to minimise noise problems on site:**

* use less noisy equipment
* keep noisy plant away from open areas and the neighbours where possible
* keep equipment well maintained
* turn off equipment when not in use – don’t allow it to be idle for long periods
* use mufflers or silencers to reduce noise.

Ensure vehicles and machinery are serviced regularly. Well maintained equipment will make less noise and will be less likely to break down.

**Dust and Smoke**

Dust, emissions and odours often generate complaints of discomfort or inconvenience. As a considerate organisation we want to avoid causing nuisance to our local community.

**BEST PRACTICE**

* Damp down – use a fine spray, and do it more often during warm and sunny weather.
* Avoid moving vehicles over unmade ground if you can help it.
* Keep to site speed limits.
* Use enclosed chutes, when dropping demolition or waste materials to the ground and regularly damp down.
* Minimise fall heights of materials.
* Protect stockpiled soil, concrete or other dust materials from the wind – compact and bind surfaces.
* Try to avoid cutting or grinding near to sensitive neighbours.
* Make sure vehicles carrying dusty materials to and from site are covered by a tarpaulin.
* Use wheel wash or clean the wheels of vehicles leaving site so that mud is not spread on the surrounding roads – dry mud will turn to dust.
* Do not use bonfire to burn your waste, otherwise you could find yourself committingan offence. Find ways to reuse or recycle your waste.
* Keep equipment that reduces emissions such as filters and cyclones in good working order.
* Excessive dust may lead to an abatement notice being issued - having to comply with strict dust levels may mean the work takes longer, is more difficult and costly.
* Make sure boilers, especially oil or solid fuel units, are operating efficiently and do not emit excessive smoke.

**Impacts of Dust**

* Excessive dust can be a nuisance to our neighbours – having to re-clean their washing, cars and windows.
* Dust can be dangerous – it may cause eye and chest irritation.
* Dust blowing into watercourses can affect wildlife.
* Excessive dust can damage plant growth.
* Dust may cause trees to drop their leaves up to 2 months early.
* Dust can cause mechanical and/or electrical faults to equipment and lead to the clogging of filters.

**Odour**

Assess whether odours are likely to be emitted from your site and put appropriate controls in place.

Consider the impact of odours from your premises on the surrounding environment as part of your routine site inspections.

**7. Carbon Energy Efficiency**

Carbon Management is a process that identifies the major sources of carbon emissions and explores ways in which these can be reduced. This process will pinpoint where money can be saved on energy, heating, waste, raw materials and fuel within the company together with ideas to reduce this wastage.

**Think about**

* What energy do you use whilst you are at work? Could you save energy and be more efficient?
* Using plant and equipment - are they regularly serviced, up to date and efficient? e.g. Correct tyre pressures save energy, under inflated tyres use more energy.
* Using temporary electrics – are they really needed?
* Security lighting – does it need to be left on all day?
* Temporary lighting – does it need to be left on at night?
* Waterproofing/Drying Out – Remember that dehumidifiers use lots of energy.
* Compressed air tools – they are up to 10 times more expensive to run than mains electric powered tools.
* Do not leave open doors and windows with the heating on!

**Did you know....?**

* A Photocopier left switched on overnight wastes enough energy to make 5,300 A4 copies.
* Lighting an empty office overnight wastes enough energy to heat water for 1,000 cups of coffee.
* A PC monitor left switched on overnight wastes enough energy to print 800 A4 pages.

**Saving energy can:**

* save your business money, e.g. reduce lighting bills
* help you offset escalating fuel costs and environmental taxation
* enhance your business’s competitive edge.

**Sustainable Procurement**

A product or service has environmental impacts throughout its life cycle from the raw materials and energy used to manufacture or provide it, to the way it is recycled or managed at the end of its life.

Your purchases may also have social impacts, for example if you buy goods or services from companies that have poor working conditions or pay below a minimum wage.

**Sustainable procurement can:**

• save money

• improve business’ competitive edge

• support the growing green economy and encourage new green goods and services to develop.

**BEST PRACTICE**

* Buy products with ecolabels (or environmental labels), for example low volatile organic compound (VOC) labels on paint, Forest Stewardship Council (FSC) certified timber products, BRE’s Environmental Profiles Certification Scheme.
* Use reclaimed materials where possible, e.g. roof tiles, bricks and flooring.
* Choose solvent-free alternatives for glues, sealants and finishes where possible.
* Use locally produced materials where possible to reduce environmental impacts and cost of transportation.
* Consider how products or materials will be packaged, e.g. can you reduce product packaging or use recycled packaging?

**Minimise your need to purchase**

* Buying longer lasting products, e.g. durable products that can be repaired and upgraded.
* Avoiding disposable products, e.g. using china plates and mugs instead of paper or plastic, or using rechargeable batteries.
* Improving storage and stock control to help reduce waste and to only buy what you need, i.e. ‘just in time’ stock control.
* Working with your suppliers to reduce their materials or resources, e.g. by using less packaging for transporting goods, alternative fuels for vehicles or renewable energy during manufacturing.
* Use products efficiently e.g. using energy efficient features will help reduce your energy use and carbon emissions.

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