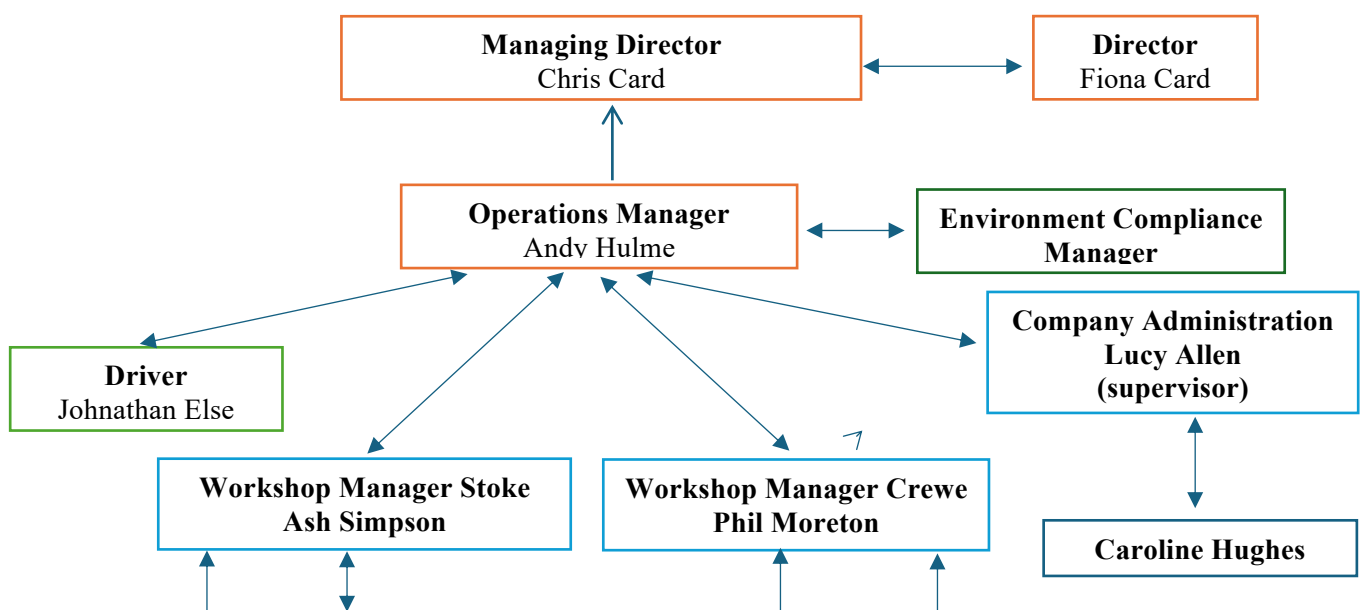


Contents

Section	Details	Page
	Introduction	1
1	Environmental policy	Error! Bookmark not defined.
	Management organisational structure	3
1.1	General	3
1.2	Duties – Managing Director	Error! Bookmark not defined.
1.3	Duties – Senior Management	Error! Bookmark not defined.
1.4	Duties – Employees	3
1.5		3
3	Arrangements	3
3.1	General principles	3
3.2	Vehicles/Transport	3
3.3	Equipment	3
3.4	Purchasing	3
3.5	Storage of substances	3
3.6	Waste disposal	3
3.7	Waste storage	3
3.8	Waste transfer	4
3.9	Use of energy	4
3.10	Control of contractors	4
3.11	Environmental complaints	4
3.12	Recycling/reusing materials	4
3.13	Records	4
3.14	Packaging	4
3.15	Noise	4
3.16	Emergency arrangements/spillage control	4
3.17	Training/awareness	5
3.18	Monitoring – inspections/audits	5
4	Waste disposal procedures	5
4.1	General office waste/packaging	5
4.2	Dry waste	5
4.3	Confidential waste	5
4.4	Hazardous Waste	5
5	Notes on environmental legislation	5

Section 1

CSC Fleet Services Ltd Environmental Organisation



Introduction

CSC Fleet Services Ltd is a family-run company tracing its origins back many years. The most environmentally sensitive areas of the business are associated with the site activities, with the workshops, transport and plant being the biggest contributors.

Environmental Policy

It is in the interest of CSC Fleet Services Ltd to have a planned approach towards the prevention of pollution and the reduction of waste, leading to a long-term reduction of costs, as prevention and reduction are more desirable and economical than damage repair after the event. Every individual, regardless of position, has a duty to ensure that the activities carried out as part of their work have the minimal impact on the environment.

This duty extends to the control of waste in such a way as to ensure illegal disposal, the conservation of energy by the reduction of wastage and the prevention of pollution by the control of spillages, emissions and discharges. The Company undertakes to provide full instruction, training, information and supervision to enable all employees to play their part in meeting their Environmental duties.

CSC Fleet Services Ltd will control its activities to avoid causing unnecessary and unacceptable risks or adverse effects on the environment, in line with the requirements of the Environmental Protection Act 1990 and other relevant legislation, as far as is reasonably practicable. Responsibility for the environment is ranked equally with that for the health and safety of employees, the public and others. CSC Fleet Services Ltd is responsible for ensuring that appropriate organisation and arrangements are made for the fulfilment of this policy and for monitoring its implementation and effectiveness.

Managing Director

The Managing Director is ultimately responsible for the application of Environmental legislation and for establishing and achieving the Environmental Policy and objectives.

The Managing Director will:

- Develop and establish the Company's Environmental Policy and Objectives.
- Ensure Management knows and accepts its responsibility for Environmental control, that it is equipped to play its part.
- That the requirements of relevant legislation are applied, and company rules and arrangements for control are observed.
- Regularly review the Company policy, arrangements and objectives on environmental issues.
- Monitor the Company's performance on Environmental issues
- Monitor the effectiveness of the Environmental Policy
- The Managing Director shall keep this policy under review and shall ensure that the company consistently complies with current legislation and continually improves its environmental performance.

Management

Management are responsible for achieving the company's environmental objectives and ensuring that the policy and procedures are followed by the employees under their control as directed by the Managing Director

Management will:

- Operate within all legal and company requirements relating to environmental matters applicable to their area
- Ensure that the company's environmental policy and objectives are implemented within their area of responsibility
- Ensure that adequate resources are allocated to environmental control matters
- Develop environmental objectives for their own departments
- Review of the performance of their department on environmental matters
- Ensure that employees receive adequate information and instruction on environmental control matters
- Clearly define procedures relating to environmental control and ensure that they are known and observed
- Ensure that environmental matters receive full consideration in production processes and operations, the purchasing of new vehicles and equipment, the installation of new systems and the planning of new operations and methods of work
- In addition, management, in carrying out their managerial duties shall:
- Take immediate action to stop any practice or procedure presenting an environmental risk.
- Ensure that all personnel in their area of responsibility have the necessary information relating to environmental matters
- Report and deal with any deviations or failures in control over environmental matters
- Ensure that all systems and procedures put in place to control environmental issues are used and maintained.
- Understand and work within all legal and company requirements relating to environmental issues.

Employees

All employees must:

- Comply with rules, procedures and instruction regarding correct disposal of waste
- Use the correct facilities provided for disposal of waste
- Not interfere with or misuse any equipment or facilities put in place to ensure that pollution does not occur
- Report any failings in equipment and facilities provided for environmental control
- Assist in the investigation into any incidents where environmental control systems have failed

To achieve these aims the company will ensure that:

- Environmental awareness and individual responsibility will be developed amongst employees at all levels with full and effective consultation being encouraged
- CSC Fleet Services Ltd will continue to develop and improve standards by making use of available technology and developments, together with a waste recovery and recycling approach
- The environmental impact of operations is minimised the aspects of the environment affected by the business is reduced as far as is practicable
- Local community interests will be considered and positive communication with the community entered where appropriate
- Clients, employees, the public and all other persons who may be affected will be made aware of any company activity which may affect the environment
- Natural habitats and wildlife will be respected and where appropriate, within the control of the company, maintenance, restoration or creation of habitats will be encouraged.

CSC Fleet Services Ltd shall review this policy annually and ensure that the company consistently complies with current legislation and continually improves its environmental performance

Section 3 Arrangements

3.1 General Principles

Environmental issues will be managed in the same way as any other aspects of business - i.e. planning, control, reviewing etc. As with health & safety, however, several arrangements specific to the management of environmental matters will operate within the business.

3.2 Vehicles/Transport

The company is dependent on reliable transport to fulfil the contractual arrangements associated with its operations. Lorries, trailers and vans are used every day to provide services to its customers. As such a significant amount of fuel and other materials associated with the use and repair of vehicles are consumed resulting in a reduction of natural resources and the emission of polluting exhaust gases. The company shall minimise this environmental impact by selecting vehicles which are efficient and ensuring that routes are planned to minimise the distances travelled.

Use will be made of route planning. It is recognised that efficiency of operation of vehicles is only achieved by regular maintenance and careful monitoring. The company, therefore, shall operate an effective vehicle maintenance programme which will be overseen by Managers, Supervisors and Employees. To ensure that employees ensure minimal environmental impact from duties, awareness training shall be carried out. This training will include the environmental consequences of driving and repair techniques, etc and unnecessary engine idling. In support of this policy, all contractors will be expected to control their use of vehicles in similar ways.

3.3 Equipment

CSC Fleet Services Ltd uses very little plant and equipment whose operation has a significant impact on the environment. Most equipment used on site is confined to Gas- and Diesel-powered forklift trucks small power tools and hand tools. Office equipment comprises mainly computers, photocopiers, communication equipment, etc.

The company shall ensure that all equipment used is up to date and energy efficient and operated in a manner which minimises its environmental impact, e.g. switched off when not in use, or powered down automatically. Where appropriate, maintenance schedules will be put in place to ensure operational efficiency.

3.4 Purchasing

CSC Fleet Services Ltd recognises that environmental considerations need to be included in all purchasing decisions in order that over-ordering, and associated waste, along with inappropriate selection do not contribute to the environmental impacts of the company's operations. When consumables, equipment, materials, etc are purchased, consideration shall be given to the environmental affects created by the use or operation of the item. Low VOC (product with fewer Volatile Organic Compounds), reducing the release of toxic fumes into the air water-based solvents, recycled/low density paper, low energy systems, etc, will be considered.

3.5 Storage of substances

Very few substances used by the company present a significant environmental threat. Oils, Greases, Fuels, Solvents etc are well contained. However, these are stored in such a way as to ensure that if they are accidentally released, i.e. packaging damaged, then they are contained sufficiently to prevent contamination of land or water courses. This containment will usually take the form of sealed bunding (trays, doubles skinned tanks, etc). If appropriate, spillage containment kits shall be readily available.

3.6 Waste disposal

Most waste produced by the company comes under the category of controlled waste – general household type waste and building waste. Within the yard area hazardous waste may be generated from the use of hazardous substance – fuels, solvents, oils, batteries, etc. Waste produced on site is generally disposed of in conjunction with a subcontractor for waste removal. The company shall dispose of all waste in line with the requirements of current legislation. Hazardous waste shall not be mixed with controlled waste, and all necessary documentation and regulatory requirements associated with the disposal mechanism shall be addressed – waste transfer notes, consignment notes, notification, etc.

3.7 Waste storage

To minimise the potential for contamination of land or incorrect disposal routing, all waste shall be contained in appropriate skips, tanks, bins, bags or other suitable containment whilst awaiting disposal. Where necessary, skips shall be sheeted or otherwise secured to prevent the waste blowing from the skip or being removed/scattered by intruders to site. Liquid wastes shall be contained in appropriate tins, drums, etc of adequate strength suitably bundled and palletised to facilitate collection and avoid damage.

3.8 Waste transfer

As part of its operations, the company is required to transfer waste from site to a suitable disposal facility. In line with the requirements of the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (as amended), the company is registered with the Environment Agency and authorised for this transfer of waste. When transferring the waste, appropriate steps shall be taken to prevent the waste from falling or blowing from the vehicle, using sheeting and/or other suitable securing method.

3.9 Use of energy

CSC Fleet Services Ltd does not use a significant amount of energy while carrying out its operational activities. However, CSC Fleet Services Ltd recognise that the minimisation of energy usage not only saves the company money but indirectly reduces the impact of its operations on the environment. Therefore, CSC Fleet Services Ltd shall monitor the use of energy by the company and put in place systems to reduce the usage to a minimum – temperature control, automatic power-down systems, encouraging switching off lights and equipment when not in use, efficient building structural considerations, etc.

The energy sources utilised at the main office comprise gas and electricity and the consumption is metered and recorded.

To minimise indirect energy usage, e.g. in the maintenance of the vehicle fleet, the company shall minimise wastage and use appropriate technology. E-technology shall be used for the transfer of data and information wherever possible to minimise the use of paper, inks, etc. Similarly, information shall be stored on media which is less demanding on resources.

3.10 Control of contractors

All contractors used by the company shall be assessed and appraised to ensure that their environmental policies are compatible with those of CSC Fleet Services Ltd. This assessment shall be carried out in conjunction with the health and safety assessment.

Where contractors are found to have inadequate environmental policies and/or operations, CSC Fleet Services Ltd shall either refrain from using the contractor or ensure that the contractor's arrangements are brought in line with CSC Fleet Services Ltd environmental requirements.

3.11 Environmental complaints

CSC Fleet Services Ltd shall record all environmental complaints submitted to them by customers, main contractors, the public or local authorities and shall ensure that the complaints are fully investigated and corrective and preventive actions taken to address the findings. All complaints shall be reviewed regularly and environmental policies and procedures amended appropriately.

3.12 Recycling/reusing materials

Materials used in both the administrative and operations functions shall be recycled and/or reused where possible. In particular, the metal waste generated from site installation activities shall be suitably stored on site and transferred to a metal recycling company.

Office paper shall be reused where possible. Scrap printouts shall be retained and used as general note paper or to feed the fax machine where the output is not presentation critical. All non re-useable paper and card is put in recycle bin located in the offices and collected by Recycle Company when full.

Empty inkjet cartridges, toner cartridges, and other printer/copier consumables shall be sent to a charity where possible to facilitate refilling/reuse.

Waste Oil is recycled and used in the Oil burner with a record of emissions kept monitoring environmental pollution.

Oil filters are emptied into oil burner and sent to local recycling yard to recycle the metal.

Waste Vehicle Batteries are sent to local recycle facility for recycling.

All pallets that are not re-used by the company are sold for re-use or recycle to local pallet yard

Other initiatives shall be developed in line with the continual improvement aspect of the company's environmental policy these include a desire to recycle large amounts of plastics at source, currently this is collated and taken to a local recycling facility.

3.13 Records

All records generated as part of the environmental management arrangements operated by CSC Fleet Services Ltd, e.g. waste transfer notes, consignment notes, assessment forms, complaints, training records, disposal contracts, etc shall be held in appropriate files within the main office. The Environmental Co-ordinator shall ensure that the records are stored such that they remain legible, are readily retrievable and are retained for the required time. Enforcement notices and contract non-conformities associated with environmental issues shall be filed appropriately and used to develop and improve the company's environmental management system.

3.14 Packaging

In carrying out site activities, very little packaging is used directly by the company. However, CSC Fleet Services Ltd recognise that the use of packaging is an environmentally sensitive area and shall ensure that whenever packaging is used consideration is given to the materials used, the quantity used and the disposal arrangements necessary. Liaison with suppliers shall be carried out to ensure that packaging is minimised and where necessary environmentally appropriate. Pallets and other reusable packaging shall be returned to the supplier or other re-user.

3.15 Noise

The activities of the company do not generate significant noise levels on site and at the offices. However, CSC Fleet Services Ltd shall ensure that any plant, lorries, equipment or activity which generates noise is used or carried out in such a way as to minimise this environmental impact. Noise suppression systems associated with forklift truck equipment shall always be used and lorry shunting activities shall be done in such a way as to minimise the noise generated, e.g. no double handling of trailers.

3.16 Emergency arrangements/Spillage control

CSC Fleet Services Ltd shall ensure that emergency arrangements are put in place in the yard and at the main office to deal with emergency conditions to minimise the potential for environmental damage. The main area for such damage is associated with fire. Therefore, appropriate fire control arrangements will be established within the offices, workshops and yard to prevent fire.

The emergency arrangements shall address the method of containing and controlling the fire should one break out. These arrangements include the provision of smoke detectors within office buildings, the installation of fire extinguishers and the training of office personnel in the fire control systems. Security systems shall be installed to prevent arson by intruders. No materials shall be stored within the office which could generate harmful emissions in the event of a fire.

Site emergency arrangements vary dependent on the contract conditions, but as a minimum the company shall ensure, that fire control equipment – extinguishers - are available on site and that flammable materials are stored in appropriately labelled containers.

A spillage control kit – absorbent granules/'socks' – shall be made available in situations where significant volumes of harmful liquids are held, e.g. fuels, oils.

3.17 Training/awareness

To ensure that this policy is successfully implemented throughout the company, appropriate awareness training in the environmental aspects and impacts of the company's operations shall be carried out for all employees and, where appropriate, contractors. This training shall be included in the company commencement of employment induction package. Records of the training shall be maintained.

3.18 Monitoring – inspections/audits

In line with its policy of pro-active monitoring to prevent harm, the managers shall regularly inspect the yard activities to ensure that the work is being carried out in such a way as to minimise the operational impacts. The inspections shall examine waste control, material storage, equipment conditions, etc.

An audit of the company's environmental management arrangements shall be carried out any non-conformity addressed. The company shall liaise with its environmental consultant on a regular basis to ensure that the Management are kept up to date with environmental legislation requirements and current best practice.

Section 4 Waste Disposal Procedures

CSC Fleet Services Ltd is responsible for the correct disposal of all waste material from the office, site repairs and the yard. The disposal methods shall be in line with the requirements of:

- Environmental Protection Act 1990 – Part II
- Environmental Protection (Duty of Care) Regulations 1991 (As Amended)
- Controlled Waste Regulations 1992 (as amended)
- Hazardous Waste Regulations 2005 (As Amended)
- Control of Pollution (amendment) Act 1989
- Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (As Amended)

Waste generated by the Company is classified as either:

- General office waste and packaging materials, cardboard, tissues, plastic
- Confidential waste - paperwork, drawings, contracts, etc
- Hazardous Waste - specific hazardous materials, including tyres, batteries, oil.

4.1 General office waste/packaging

General office waste shall be placed in the office waste bin to be collected by the local council. Where possible packaging waste shall be returned to the suppliers or utilised for any storage or material movement requirements. No clinical or Hazardous Waste shall be placed in the general controlled waste bin. Paper waste shall be collected by a designated paper disposal company.

4.2 Confidential Waste

All confidential waste (documentation – letters, drawings, agreements, etc) shall be shredded and bagged and disposed of via the secure paper waste route.

4.3 Hazardous Waste

Substances designated as hazardous under the COSHH Regulations are disposed of as Hazardous Waste, e.g. some solvents, batteries, fuels, oils, tyres, etc. Such substances shall only be disposed of by waste disposal companies authorised to handle Hazardous Waste as defined. The necessary documentation required under legislation shall be completed by the relevant parties in the specified manner and within the specified timescale.

Section 5 Notes on Relevant Legislation

Environmental Protection Act 1990 – Part II

Principal legislation that regulates the management of waste. Introduced strict licensing controls and other provisions aimed at ensuring waste handling, disposal and recovery operations do not harm the environment. Responsibility for waste rests on the person who produces it and everyone who handles it, right through to final disposal and/or reclamation. It applies to all companies producing controlled waste. Controlled waste includes household, industrial and commercial waste and covers some Hazardous Waste.

Sections 33 and 34 of the Act are of most relevance to waste producers. Section 33 makes it an offence to treat, keep or dispose of controlled waste without a waste management licence, or 'in a manner likely to cause pollution of the environment or harm human health'.

It also states that a waste management licence cannot be surrendered until the regulators are satisfied that the condition of the land is unlikely to cause pollution of the environment or harm to human health. Section 34 introduced a statutory Duty of Care for all those producing or dealing with waste.

Environmental Protection (Duty of Care) Regulations 1991 (As Amended)

Require anyone who produces, receives, holds, carries, treats or disposes of controlled waste or who, as a broker, has control of such waste, to prepare and retain written descriptions of waste and transfer notes and to furnish copies on request. The transfer notes should contain a description of the waste and all parties in the transaction and be kept for a minimum of two years. Waste should only be transferred to an authorised person.

Controlled Waste Regulations 1992 (as amended)

Define controlled waste – most wastes from industry and commerce are controlled wastes, including materials that are destined for recycling.

Hazardous Waste Regulations 2005 (as amended)

Defines Hazardous Waste. Producers, carriers and disposers of Hazardous Waste are required to keep a register of consignment notes for a minimum period of three years. Those who produce Hazardous Waste must notify the receiving agency between one month and three days before the waste is to be transported to its destination. Prior authorisation must be obtained before mixing different categories of Hazardous Waste or Hazardous Waste with non-Hazardous Waste.

Control of Pollution (amendment) Act 1989

Introduced provisions for the registration of carriers of controlled waste and a procedure to aid the Environment Agency in controlling fly-tipping.

Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)

Introduced a registration scheme for waste carriers and made it a criminal offence to transport waste without being registered. Registration is not necessary if carriers are transporting waste that they have produced themselves, unless it is of building or demolition origin.

Waste Management Licensing Regulations 1995 (as amended)

Underpin the whole of the waste management licensing system. Define directive waste. Deal with storage, treatment, recycling and disposal of directive waste. A licence issued by the Environment Agency is necessary before embarking on any waste management activity. The Regulations re-classify the certificates which an operator must hold for various facilities to be a 'fit and proper person' for the purposes of holding a waste management licence.