



Environmental & Sustainability Policy

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02	09/08/12	3 rd Issue	<i>S Sawyer</i>
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04	08/08/14	5 th Issue	<i>S Sawyer</i>
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ENVIRONMENTAL & SUSTAINABILITY POLICY STATEMENT

.....STUART GROUP LTD.....

Stuart Group Ltd is a professional and environmentally conscious organisation, which acknowledges the impact that our operations may potentially have on the environment. The clear objective of Stuart Group Ltd is to minimise the Environmental Impact of our operations and products through the adoption of Sustainable Practices and Materials, coupled with monitoring and continual improvement of Environmental Performance. This will be achieved by:

- Preventing pollution, reducing waste and ensuring that wherever practical, measures are implemented to protect and preserve natural habitats, flora and fauna;
- Considering the effects that our operations may have on the local community;
- Taking action to eliminate or reduce, as far as practicable, any potentially adverse environmental impacts;
- Using wherever possible recycled or natural products from Sustainable Resources
- Promoting environmental awareness amongst our suppliers, contractors and partners by implementation of operational procedures;
- Seeking to work in partnership with the community by behaving in a considerate and socially responsible manner;
- Ensuring effective and expedient incident control, investigation and reporting. The resulting preventive measures will be enforced and monitored to prevent any reoccurrence.
- Fully maintaining all Plant and Vehicles to ensure maximum fuel efficiency and effectiveness of filtration systems.

Management and supervisory staff have responsibilities for the implementation of the policy and must ensure that environmental issues are given adequate consideration in the planning and day-to-day supervision of all work.

Stuart Group Ltd will fully comply with the duties placed upon it within the requirements of Statutory Legislation, whilst at all times complying with, as a matter of best practice, the requirements and duties set out within Approved Guidance as issued by the Environment Agency and other organisations.

All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own works, so far as is reasonably practicable, are carried out without risk to themselves, others or the environment. This includes co-operating with management on any Sustainable Resource related matter.

The Directors have overall responsibility for all Environmental and Sustainability matters. The operation of this policy and the associated procedures will be monitored and reviewed on a regular basis to ensure that they remain current and applicable to Stuart Group Ltd activities. This policy has been endorsed by the board of directors who give their full support to the implementation of the policy.

Signed:

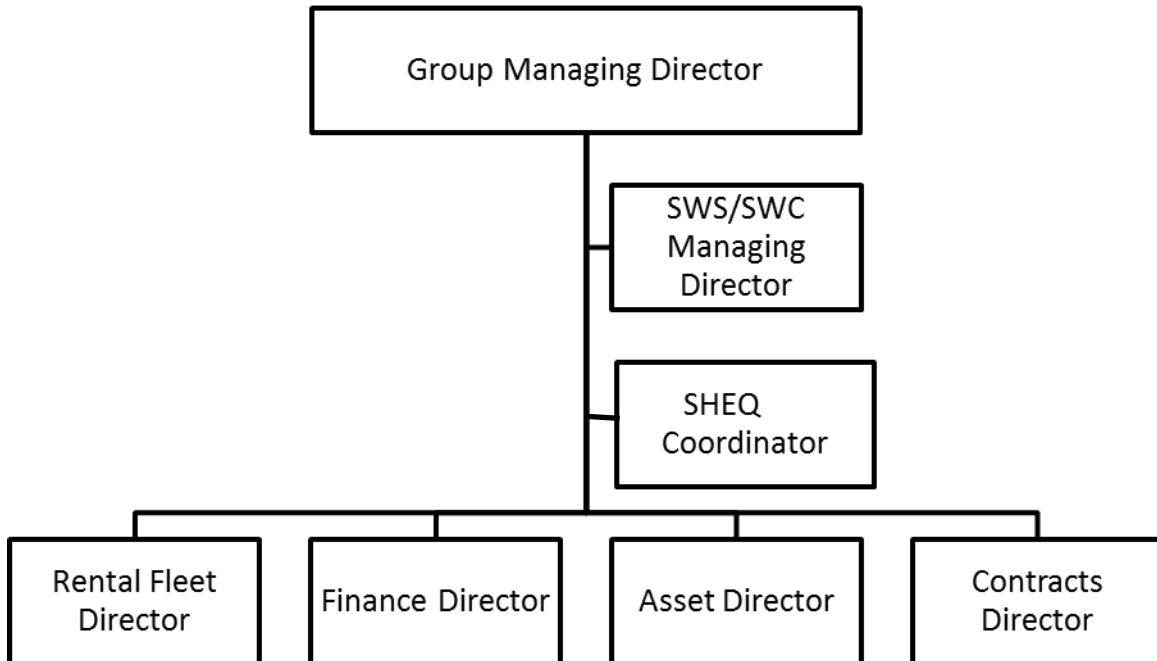


Date: 8th August 2016

Stuart Sayer (Group Managing Director)

Part 2 Organization

2.1 Organisation Chart



2.2 Roles and Responsibilities

2.2.1 The Group Managing Director (GMD) will:

- a) Initiate, administer and interpret the effective implementation of the Environmental Policy
- b) Have an understanding of the application of the Environmental Legislation as applicable to the workings of the Group.
- c) Arrange for funds and facilities to meet the requirements of the Policy.
- d) Be aware of changes in legislation which affect the Company.
- e) Promote Good Environmental Practice generally.
- f) Reprimand any member of staff failing to exercise their Environmental responsibilities.
- g) Set a personal example.

2.2.2 The Directors will:

- a) Have an understanding of the application of the Environmental Legislation as applicable to the workings of the Group.
- b) Ensure that the GMD is briefed on all Environmental matters.
- c) Report Environmental Incidents to the Environment Agency if applicable.
- d) Give authoritative and financial support to the Environmental Manager to enable him to discharge his duties.
- e) Set a personal example.

2.2.3 The SHE Coordinator will:

- a) Have an understanding of the application of the Environmental Legislation as applicable to the workings of the Group.
- b) Report to the Directors and keep them appraised on all matters regarding environmental management
- c) State the Company's policies in writing with regard to environmental management and ensure it is brought to the attention of all employees.
- d) Ensure that arrangements are made for implementing the Company's Environmental Policy.
- e) Ensure that environmental management data is collected, reviewed and reported on
- f) Ensure that Company procedures, instructions and guidance are regularly reviewed and amended as necessary
- g) Provide environmental advice to managers, employees and customers using, as necessary, specialist external advisors/consultants
- h) Promote positive environmental values throughout the Company
- i) Communicate effectively with external organisations, such as the Environment Agency, regarding the policy and its implementation
- j) Investigate environmental incidents and record all findings and make recommendations for the prevention of similar incidents
- k) Liaise with procurement and project managers on contract standards and any future changes or additions required to the policy
- l) Monitor the effectiveness of the procedures by workplace inspections and audits and report on any improvements that may be required.

2.2.4 Managers, Foremen, Supervisors and Equivalentents will:

- a) Have an appreciation of the application of Environmental legislation affecting site operations and an understanding of their role in incident prevention.
- b) Know and have observed the requirements of the Company Environmental Policy.
- g) Plan and maintain a clean, tidy and safe site and dispose of all waste in an approved manner.
- m) Assist the Environmental Manager in the execution of his duties, and co-operate and act on his recommendations.
- n) Set a personal example.

2.2.5 Tradesman, General Operatives, and Sub Contractors will:

- a) Report to their Supervisor any defects in plant or equipment that may become detrimental to the Environmental
- b) Take reasonable care to protect the Environment.
- c) Suggest ways of assisting the Company to help protect the Environment.
- d) Set a personal example.

2.2.6 All members of staff, regardless of the nature of their specific duties will:

- a) Co-operate with Management on all Environmental matters.
- b) Not interfere with anything provided to safeguard the Environment.
- c) Take reasonable care to protect the Environment.
- d) Report any damage or defects in materials or equipment which may, or is, causing damage to the Environment to their Supervisor.
- e) Co-operate in the investigation of any Environmental Incidents.
- f) Set a personal example.

Part 3 Arrangements

3.1 Environmental Risks arising from our Work Activities

- a) Environmental Risk assessments will be undertaken to identify all Aspects & Impacts associated with the companies' activities. The significant findings of risk assessments will be documented separately from this policy, and actions to remove, reduce and control risks will be approved, implemented and reviewed.
- b) Environmental Risk assessments will be undertaken by the SHE Coordinator.
- c) An Aspects & Impacts Register will be maintained by the SHE Coordinator.
- d) Assessments will be reviewed every 12 months or when the work activity changes, whichever is the soonest.

3.2 Training & Consultation with Employees

- a) Employee training & consultation on Environmental matters will take place via
 - i) Bi-monthly Safety, Health, Environmental & Quality (SHEQ) Committee meetings
 - ii) Toolbox Talks
 - iii) Issue of SHEQ Memo to notice boards
 - iv) Personal Letters
 - v) Company Briefings
- b) Employee SHEQ Representatives from all of the areas listed below will be invited to attend:
 - All Engineering and Transport Staff
 - Depot Staff
 - Well Services Warehouse Staff
 - Well Services Site Engineers
 - Offices

3.3 Aspects & Impacts

- a) The Company is continually reviewing the Environmental Aspects & Impacts while carrying out its business. The register below is an excerpt of the aspects and impacts of the Company a full Aspects and Impacts register is held and amended in the Health, Safety and Environment folder on the company intranet.
- b) Having registered an Activity an Environmental Risk Assessment is completed to ascertain the level of significance, Control Measures and any Improvements required. These documents are held separate to this policy.

3.3.1 Register of Environmental Activities, Aspects & Impacts

	Activities	Aspects	Impacts
1	Company Facilities. Offices & Workshops	Heating Fuel use Electricity use Water use	Depletion of Non-renewable resources (Fuel) (-) Add to CO ² produced through generation of energy (-) Use of Natural Resources (Water) (-)
2	Salesman/Engineers Travel	Transport Fuel usage	Emissions to atmosphere, CO ² , NO,SO (-) Depletion of Non-renewable resources (Fuel) (-) Add to road congestion (-)
3	Use of Heavy Goods Vehicles for Equipment Collection & Delivery	Transport Fuel usage	Emissions to atmosphere, CO ² , NO,SO (-) Depletion of Non-renewable resources (Fuel) (-) Add to road congestion (-)
4	Diesel Generator / Pump operation	Fuel usage	Emissions to atmosphere, CO ² , NO,SO (-) Depletion of Non-renewable resources (Fuel) (-) Noise pollution (-)
5	Use of Diesel Fork Lift Trucks	Fuel usage	Emissions to atmosphere, CO ² , NO,SO (-) Depletion of Non-renewable resources (Fuel) (-)
6	Receipt of packaged Goods	Disposal of Packaging	Add to Landfill (-) Add to recyclable waste streams (+) Re-use packaging for outgoing goods (+)

3.3.2 Measurement of Carbon Emissions

The Company measures Carbon Emissions to Atmosphere using the National Energy Foundation Emissions Calculator. These are recorded in Kg / month. The table of records is held in the Environmental Folder / Carbon Emissions File.

These figures are discussed as part of the Management Review Meeting with targets for reduction set at these meetings.

To be recorded by the SHEQ Coordinator Monthly and reviewed by the Board of Directors Annually.

3.4 Emergency Incident Procedure

The procedure outlined below is also included in all Project Site Files as part of the Health & Safety Plan.

3.4.1 Environmental Incident Plan

In the event of a fuel, or other hazardous liquid spillage the following Emergency Action Plan is to be instigated.

Step 1:

Consider the safety of yourself and others.

Refer to COSHH Risk Assessment for the spilled substance.

Step 2:

If practicable, and safe to do so,

- Prevent further leakage.
- Contain the spill to minimise the environmental effect, using spill kit.
- Soak up spill where possible.

Step 3:

As soon as possible complete a Spill Report stating:

- The exact location and time of the spillage.
- Product details of the liquid spilt.
- How much has been spilt (it is better to over estimate than underestimate the volume)
- What action has been taken so far.

Inform Stuart Group Service Reception of the incident and request further assistance if required. 01953 458971

Disposal

The disposal of waste, spilled or used material is subject to the Control of Pollution (Amendment) Act 1989

Once the absorbent material has completed its job it must be bagged up and labelled, for disposal in a safe manner.

3.4.2 Incident Reporting and Investigation

When required, incident Investigations will be carried out by the SHE Coordinator or the Departmental Manager / Director. All investigations will be entered on a register with results, findings and recommendations passed on to the relevant Director.

3.4.3 Near Miss Reporting.

The company operates a Near Miss reporting procedure. Report forms are held by Departmental Managers and at locations around the site. Staff are encouraged to complete the form with a "No Blame" culture. A register of near misses is maintained by the SHE Coordinator and used to highlight possible areas of concern.

3.4 Relevant Legislation

RELEVANT LEGISLATION AND OTHER REQUIREMENTS

AIR POLLUTION LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
The Control of Asbestos in the Air Regulations 2012	Duty to prevent significant environmental pollution from the working of products containing asbestos or from the demolition of building structures or installations containing asbestos.	“Abnormal”, i.e. maintenance.
Road Vehicles (Construction and Use) (Amendment) Regulations 2012	Requires vehicle users to keep engines in tune and any equipment, such as catalysts, working correctly. Sets standards for emission testing for petrol engine cars and light goods vehicles.	Company cars and vans.
Common Law	Statutory nuisance – see under Miscellaneous Legislation.	Dust, odours possible from manufacturing.

WATER AND EFFLUENT LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
The Water Resources Act 1991 Part III (Amendment) regulation 2009	It is an offence to cause or knowingly permit any poisonous, noxious or polluting matter or any solid waste matter to enter any controlled waters; or any matter whatever to enter inland waters which might affect its flow in a way, which leads to or aggravates pollution from other causes.	Potential spillages. Unauthorised cleaning operations. Discharge consents.
The Control of Pollution (Oil Storage) (England) Regulations 2001	Requirements covering tank design, pipework design and configuration, containment and siting for oil containers over 200 litres capacity.	205 litre drums of free oil if stored outdoors.
The Water Industry Act 1991 (Sect 71-75) & the Water Supply (Water Fittings) Regulations 1999	It is an offence for the owner or occupier of premises either through negligence or intentionally to allow fittings to remain in disrepair so as to cause the contamination, wasting or misuse of water. Similar requirements in relation to new water fittings.	Plumbing systems – water used in office and factory.

WASTE MANAGEMENT LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
Common Law	Statutory nuisance - see under Miscellaneous Legislation.	Litter escape esp. from outdoor storage.
Environmental Protection (Duty of Care) Regs 1991	Applies to anyone who handles controlled waste and sets out certain duties to prevent pollution or the escape of waste.	All waste arisings until ultimate disposal.
Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regs 1991	Sets out details for the registration of waste carriers and brokers by the Environment Agency for the purposes of Duty of Care.	All waste arisings until ultimate disposal.

Hazardous Waste Regulations (England) 2005 and List Of Wastes (England) Regulations 2005	Requires separation of mixed wastes; prohibits mixing of wastes without permit. Requires notifications to Environment Agency (EA) of premises where hazardous wastes are produced or removed. Prohibits removal of wastes from premises not notified or exempt. Sets out requirements for movements of hazardous waste and for records and returns to be submitted to EA. Producer to keep records for at least three years. Transposes the European Waste Catalogue to UK law. Defines hazardous and non-hazardous wastes.	Oily &/or abnormal, occasional waste arisings where hazardous (to be positively determined).
Waste Management Licensing Regulations (amendment) 2005	Sets out requirements for licensing by EA, under specified conditions, for anyone storing or treating waste; also for permissible exemptions.	Exemption issued by EA – waste received for recycling by factory.

PACKAGING	BRIEF DETAILS OF ACT	RELEVANCE
Responsibility Obligations (Packaging Waste) Regulations 2007	Sets out recovery and recycling targets for those organisations with a turnover of £2M p.a., using or producing more than 50 tonnes p.a. of packaging, or raw materials for packaging.	All packaging incl. pallets – duty to assess and take action if over threshold.

CONTAMINATED LAND LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
Environment Act 1995	Local authorities are empowered to identify contaminated land and to designate special sites. The authority has a duty to require contaminate sites to be remediated by the appropriate person. If the person fails to do so they have committed an offence. The authorities can then carry out the remediation work and recover the cost.	Not directly applicable, but potentially relevant to general issues.

NOISE POLLUTION LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
Common law	Statutory nuisance - see under Miscellaneous Legislation.	Factory noise Road traffic noise.
Environmental Protection Act 1990 Part III	Gives local authorities powers to deal with a wide range of statutory nuisances including “any accumulation or deposit which is prejudicial to health or a nuisance”.	Factory noise Litter and other potential material escape.

MISCELLANEOUS LEGISLATION	BRIEF DETAILS OF ACT	RELEVANCE
Carriage of Dangerous Goods by Road Regs 2011	Consignors of dangerous goods must ascertain the correct classification for dangerous goods before they can be transported by road.	Sale of dangerous substances as product.
Chemicals Hazard Information and Packaging for Supply Regs 2009	Under these regulations it is an offence to supply any substance or preparation which is dangerous for supply unless it has been classified under CHIP.	Sale of dangerous substances as product.

Common Law (& Environmental Protection Act 1990 Part III)	Statutory nuisance. Public nuisance affects the material comfort or quality of life of the general public and is a criminal offence. Private nuisance affects an individual (or small number of individuals) and is a civil wrong.	Amenity issues incl. site appearance, litter, potential spillages & other material escape, vehicle movements.
Finance Act 2012	Institutes the Climate Change Levy – energy surcharge.	Indirect – no actual constraints.

OTHER REQUIREMENTS (VOLUNTARY)	BRIEF DETAILS	RELEVANCE
EN ISO 14001:2004	Environmental management system specification & guidance.	All company activities.
Green Claims Code	Requirements for nature and substantiality of environmental claims within promotional material.	Catalogue etc.

The foregoing is the Environmental Policy of Stuart Group Limited after due consultation with those involved in its operation, and has the full backing and authority of the Board of Directors.

Signed



Mr S Sayer, Managing Director

8th August 2016