

ENVIRONMENTAL MANUAL

Please read in conjunction with TRAD UK (Trading as TRAD Hire & Sales Ltd) Environmental Policy

Rev	Date	STATUS / DESCRIPTION OF CHANGES
01	01-Sept-20	First Issue – TRAD Hire & Sales and Safety Systems have merged to become TRAD UK (which is the brand name for TRAD Hire & Sales)

Signed:		Colin Dobson Managing Director
Signed:		Jim Gorman Deputy Managing Director
Date:	1 st September 2020	
Review	Annually	

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Introduction

TRAD UK (Trading as TRAD Hire & Sales Ltd) has a very low impact on the environment and low risk of pollution. Outsourcing is not a major risk as this is controlled by our clients under their environmental policies on site. Clients are informed at PQQ stage about the delivery of goods (and the service of supplying scaffolding) for site operations.

This Manual – and accompanying Policy – details specific requirements for Environmental control, but please note that SHEQ control – including for the Environment – is included in many of TRAD’s policies, procedures and processes.

Environmental Responsibilities

BOARD OF DIRECTORS

The Board of Directors will ensure insofar as is possible establish and maintain environmental policies for all operations that may have a detrimental effect on the environment. This objective shall be achieved by:

- The allocation of responsibilities to personnel employed or controlled by the Company;
- Having available such in-house expertise and external consultants as may be required;
- Requiring that such training, instruction, monitoring and information is arranged and presented as and when required;

The Board of Directors shall initiate, commission, encourage and support such environmental management initiatives as may be required by change of statutes passed by Parliament. The Board of Directors shall ensure that adequate and suitable funds are allocated each financial year, to allow those responsible for the environmental management programme to carry out their duties and duty of care without financial hindrance.

IN-HOUSE HEALTH AND SAFETY MANAGER

The Company employs a Health & Safety Manager, Nick Smith to monitor and improve SHE within the company with assistance from our Group SHE Manager, and help discharge the Company’s duties, including revising any TRAD Policy, Procedure, Manual or Form with changes to legislation.

DIRECTORS/MANAGERS/SUPERVISORS

All company directors/managers/supervisors are responsible for the environmental safety of staff, customers and visitors within their areas of responsibility.

They are also responsible for:

- Providing procedures and instructions for safe working practices;
- Ensuring staff under their responsibility are suitably trained and competent for their duties;
- Assessing for risks to the environment from work activities and working conditions;
- Monitoring operations regularly to ensure that work continues to be carried out environmentally safely in accordance with procedures and instructions provided;

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- Ensuring that equipment performs correctly and is environmentally safe to operate;
- Monitoring environmental matters in their areas of supervision by inspection or audit;
- Ensuring that all environmental damage or near miss incidents are reported and investigated and that investigating results are passed directly onto Nick Smith immediately;
- Ensuring environmental safety is designed into all activities and equipment prior to the commencement of work in order to eliminate or control risks;
- Ensuring that employees, workers and contractors are aware of the correct procedures for dealing with materials spillage's and disposal of hazardous waste in a manner that is both safe and environmentally responsible;
- Ensuring that employees, workers, and contractors are aware of the arrangements and actions required in the event of an environmental incident;
- Providing adequate staff supervision particularly for young workers, new employees, workers, contractors, or employees carrying out unfamiliar tasks.

EMPLOYEES AND WORKERS

The co-operation of every person employed by the company is essential to the success of the environmental policy.

The company's environmental policy places duties on all employees and workers. These are:

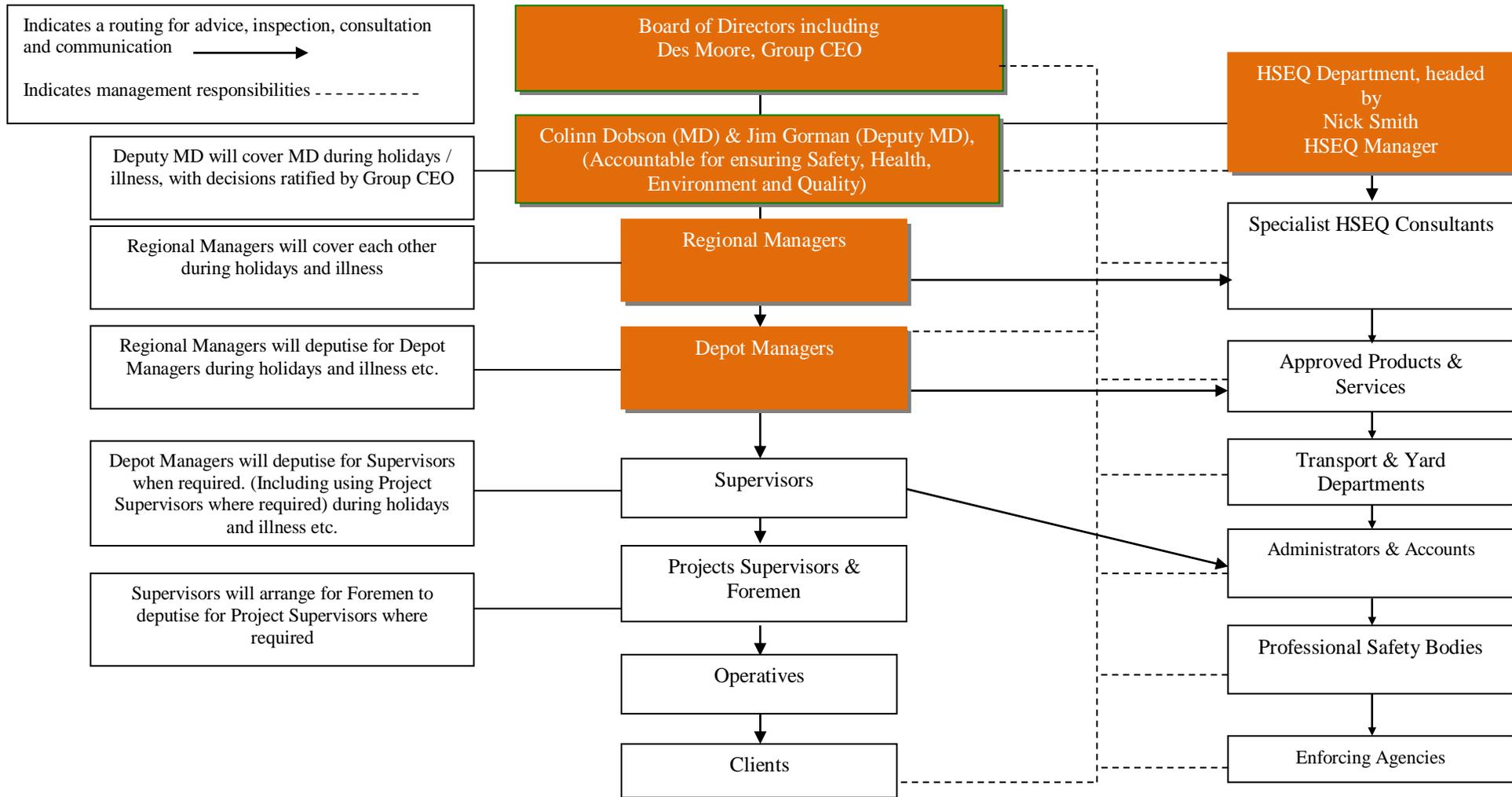
- To follow the company's environmental rules and procedures;
- To minimise waste and recycle waste materials wherever practical;
- To comply with clients environmental requirements when operating on their premises.

All employees and workers have a duty to comply with all the Company environmental rules, procedures and instructions laid down.

- They must report promptly to their manager any defects found in vehicles, equipment or any environmental hazard observed;
- They must report immediately to their manager any incident involving environmental damage or risk;
- Observe all laid down procedures concerning processes, materials and substances used;
- Where required, attend as requested any training course designed to further the need of environmental matters;
- Observe all emergency and evacuation procedures in place.

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Organisational Chart



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OPERATIONS

Site Operations

All work is planned in advance on site using the TRAD RAMS Template to create site specific RAMS. All material will be returned to the yard after completion of operations.

Transport Procedure

We are Bronze FORS and use well maintained vehicles.

Yard Procedure

Yard Managers are fully aware of the risks involving the environment and ensure that waste is kept to a minimum and ensure compliance with all legislation.

Office Procedure

Staff are fully briefed on all environmental risks (which because of the nature of the business are low risk).

TRANSPORT

The company will assess and implement methods of reducing fuel and pollution with its operations by simple practical solutions. The company identifies that reducing fuel costs and pollution output is financially the right thing to do as well as environmentally sound.

The company will achieve this by:

- Carrying out an aspects and impacts assessment;
- Ensuring we comply with all environmental legislation, including ESOS, implementing any recommendations that are cost effective
- Purchasing modern efficient vehicles when replacing old fleet vehicles;
- Working towards the best available Euro fleet or alternative fuel standard such as hybrid;
- The use of fuel additives (Adblue) to reduce exhaust emissions;
- Training drivers to drive more efficiently and use less fuel;
- Planning journeys to produce a more efficient route to destinations.

ENVIRONMENTAL UPDATES

TRAD Co is responsible for keeping the Company up to date with new and changing environmental legislation, case law, and best practice (and compliance with other requirements to which it subscribes) and of supplying a full list of relevant legislation and best practice with which the company must comply.

Where required due to the risks, the Company will also employ the services of consultants (such as Carbon Footprint or Safety & Access Limited) to provide professional assistance and guidance to support

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the line-management and in-house SHE Department. They are appointed as competent advisors and help discharge the Company's duties.

COMPETENCE, TRAINING & AWARENESS

TRAD has a general duty to employees provide all necessary information, instruction, training and supervision. As the Environment is low risk, no separate training is required, but aspects of environmental awareness are included in relevant training courses.

REDUCE

The company will within its EMS shall reduce any packaging material where practicable.

RE-USE

The company will within its EMS re-use any material where practicable.

RECYCLING

The company will recycle where practicable.

ENERGY

The company will assess and implement methods of conserving energy with its operations by simple practical solutions. The company identify that saving energy is financially the right thing to do as well as environmentally sound, with details added to Aspects and Impacts Register.

ENVIRONMENTAL ASPECTS AND IMPACTS REGISTER (W.I 0049)

A systematic study will be undertaken to ensure that adequate consideration is given to possible environmental hazards as a minimum this will include:

- Identification of substances that may cause harm to the environmental;
- Assessments of the techniques available to eliminate, minimise or render harmless releases of such substances as to establish "best environmental techniques" (BAT);
- An assessment of the possible impact of the process on the environment to establish "Best practical environmental option" (BEPEO).

OBJECTIVES

Annually, Senior Management shall review our company's EMS to ensure its continued suitability, adequacy and effectiveness. The review will include assessing opportunities for improvement and any required changes to the EMS (including the environmental policy, objectives and targets, which are detailed overleaf).

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Objectives & Targets

Targets	Details	Evidence	Responsibility	Start Date	Forecast Finish Date	Closed Out?
ESOS	TRAD Group understands that the Group falls under the scheme with over 300 employees working for Trad	N/A	Group Directors	31 st Dec 2014	N/A	Yes
Audit and submittal of report by ESOS Auditor.	TRAD will arrange for an authorised ESOS Auditor to audit the companies.	Submittal of report	Group Directors	23 rd Dec 2014	End of January 2016	Yes
ESOS (2018-19)	TRAD to plan for the next Group ESOS Audit by arranging measuring to take place of the group by September 2017 (and to carry out this measuring to ensure that we have systems in place to measure by September 2018 to August 2019).	Spreadsheet for the group	SH	September 2017	August 2019	On-going
Water consumption Toilets waste and foul water production	Reduce all 9lt flushing cisterns to 6lt by inserting water reducing adaptor in cisterns.	Depot Audits	NS	April 18	April 2019	No
Fuel consumption Forklift trucks	Look at replacing the diesel FLT trucks with cleaner LPG at renewal of contracts.	New contracts	NS	April 18	End of existing contracts 2018-24	On-going
Diesel fueled car fleet	Replace existing fleet with petrol/hybrid engines	Policy to be changed after agreement with senior management	Group Directors	April 18	At car renewal once policy has been agreed	On-going, agreed in principle from April 2019

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