

EWG-E-MP-02 - Environmental Management Toolkit



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Contact us

Issue 2 rev c / Oct 2023



**ERIC WRIGHT
GROUP**

Introduction

Over the past 25 years, the world has become increasingly aware of the plethora of environmental issues it faces, including global warming, air pollution, plastics, waste, ozone depletion, water pollution, resource depletion, biodiversity loss, environmental degradation and climate change.

As one of the least environmentally friendly industries in the world, we are central to sustainable development policies and as such, are targets and shareholders.

The construction industry has a major role to ensure that the built environment is shaped to deliver a sustainable future and reduce a number of environmental pressures, both globally and locally. coming under increasing pressure from government legislation, client demands, international targets, European The benefits to our business from improving our environmental performance are significant, from complying with law and policy, ensuring natural resources are passed to future generations, and benefitting our bottom line.

This toolkit has been created as a 'one stop shop' for environmental issues throughout all phases of a development. It includes topic specific legislative requirements, guidance documents, procedures, work instructions, checklists and best practice.

The toolkit should be used in partnership with the Compliance team.

Sustainability Tools



Site Establishment



Existing Environmental Features



Site Management



Waste



Procurement



Reporting

1. Site Establishment

An efficient and effective site establishment provides the foundation for a successful project. It allows projects to hit the ground running, reduce the potential of environmental issues from early management (positioning cabins and fuel bowzers away from sensitive receptors), generates a good appearance of site, our company and our industry, as well as having the potential to reduce running costs for your project.

**Planning inc.
EMP, Hazard ID & Risk
Assessment**

Site Welfare

Grid Connection

Emergency Preparedness

1. Site Establishment > Planning inc. EMP, Hazard ID & Risk Assessment

[Useful documents / guidance](#)

The first stage of adequately assessing site risks is to complete a **Hazard Identification & Risk Assessment**. A Hazard Identification & Risk Assessment consists of a desk top review and site walkover. It is designed to recognise aspects of your proposed works which could have an impact on the local / global environment. Once hazards have been identified and risks assessed, control measures **should** be implemented to **minimise** or **mitigate** the potential environmental impact.

A Hazard Identification & Risk Assessment **must** be completed for all projects (including managed assets) **prior to start on site**. It **should be used in collaboration** with your risk and opportunities register. As part of your hazard identification you should consider the time of year the project may span and any ecological risks this could pose e.g. the period of March to September is nesting bird season.

By applying control measures, the impact can be significantly reduced and community relations improved. See **EWG-E-T-006 – Hazard Identification and Risk Assessment** for suggested control measures.

For example; a project may be required to demolish an existing building prior to the erection of the new development. The site location is in a residential area and therefore statutory nuisance (noise / vibration / dust) will be an issue during all phases of the development. The impact of this to the local community / residents will be high, and complaints likely.

Potential control measures for this example may include:

- Frequent letter drops to local residents informing them of the work
- Effective positioning of plant & equipment
- Briefing staff on their responsibilities
- Ensuring idling engines are prohibited
- Use of noise screening where viable
- Onsite noise monitoring



Hazard Identification

Risk Assessment

Control Measures

Monitor & Review



1. Site Establishment > Site Welfare

Site cabins are an important element during site setup.

Procuring energy efficient site cabins, although slightly more expensive, will reduce your running costs and energy production.

Options you should consider include:

- Size of cabins required for site works
- Power source (generator size / type, main electricity grid connection)
- Renewable technologies such as solar panels / hybrid generators with battery storage



The responsible use of site cabins is critical to ensure running costs are minimised, energy is not wasted and the risk of pollution is reduced.

Sites should:

- Place cabins away from sensitive receptors such as watercourses
- Keep doors and windows closed whilst heating units are on
- Turn off all lights and heaters if they are not on Passive Infra Red (PIR) sensors or a time clock system
- Unplug chargers and other electrical equipment when not in use
- Shut off generators when they are not required (overnight / weekends) or consider having them set on a timer for operational hours only

1. Site Establishment > Site Welfare > Internal & External

[Useful documents / guidance](#)


Display the following EWG environmental documentation* (ensure those requiring information are completed before displaying):

- EWG - Environmental Policy (EWG-E-P-001)
- Emergency Response Register (EWG-E-F-843)
- Spill Response (EWG-E-WI-03)
- Environmental Emergency Action Plan (EWG-E-WI-038)
- Site Waste Management Plan (EWG-E-T-002)
- Site Refuelling Process (EWG-E-F-844)
- SHEQ bulletins

**these documents can be obtained from the management system or via the "useful documents / guidance" button*



Ensure site set up is designed to minimise harm to the environment e.g. cabins located to minimise noise disturbance to neighbours. Use features to ensure ongoing high standards of site such as:

- Boot wash facilities
- Litter bins
- Hardstanding areas to reduce dust production from plant
- Road sweepers when required
- Spare paint on site for any graffiti

1. Site Establishment > Grid Connection

Seek electrical connection to the grid at the earliest opportunity rather than use generators. Achieving this:

- Reduces costs dramatically – Up to 60%
- Produces fewer greenhouse gas emissions
- Reduces noise and odour pollution
- Increases on site space that would otherwise be occupied by generators

Other considerations:

- Connection to the grid takes time. Start the process as early as possible to take full advantage of the savings
- On shorter projects, the initial cost of connection, and the time delay may make grid connection unfeasible
- When using generators, ensure they are used as efficiently as possible. Use a suitably sized generator and switch it off when not required
- Consider solar pods or hybrid generators when a grid connection is not feasible
- Clarify that a permanent supply can not be brought on at an earlier stage in the contract, before financing temporary supplies



1. Site Establishment > Emergency Preparedness

[Useful documents / guidance](#)

The construction industry contributes the greatest number of significant environmental incidents. The effects of any leak, spillage or statutory nuisance incidents can be reduced by having effective emergency response arrangements. To do this:

- **Identify** the emergency arrangements specific to your site by completing a Hazard Identification & Risk Assessment
- **Complete** and **display** necessary documents
- **Ensure** spill kits are appropriate to the potential spill and are located at key locations. **Identify** this on the site logistics plan
- **Ensure** staff are trained to use the spill kits
- **Ensure** that any drainage plan is up to date and covered in the induction
- **Ensure** drip trays / interceptor trays / plant nappies are in use along with any other protection measures required
- **Monitor** through regular checks and record in site diaries
- **Test** your site emergency response and act accordingly
- **Report any Environmental incidents or emergencies as soon as safe to do so to the Site Manager and report through SHE Assure**, the report should include details on actions taken and any lessons learnt.



2. Existing Environmental Features

There are many existing environmental features that could affect any site. To reduce risk, it is vital we fully understand the issues in order to adequately minimise / mitigate against the risks. Failure to identify and reduce these risks could result in the business receiving penalties.

Protected Sites

Tree Protection

Invasive Weeds

Protected Species

Archaeology

Surface Water

Drainage

Groundwater

Contaminated Land



2. Existing Environmental Features > Protected Sites

[Useful documents / guidance](#)

We **must** consider how our works could impact on any protected site. These areas are classed as such due to their environmental, historical or cultural value to the nation. There are a variety of sites that are protected for different reasons including listed buildings and open spaces.

The following areas are all protected by law:

- National parks
- Areas of outstanding natural beauty
- Sites of Special Scientific Interest (SSSIs)
- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs)
- RAMSAR Sites
- Sites of Community Importance (SCIs)
- Marine Conservation Zones

Planning authorities can consult Natural England if an activity has the potential to affect a protected site. They can enforce changes to our plans, ensuring we do work in a certain way or even refuse planning permission.

If our works affect a European protected site, it may be compulsory to provide additional information / assessments in order to complete the works.



2. Existing Environmental Features > Tree Protection

[Useful documents / guidance](#)

Sites may encounter trees that are subject to Tree Protection Orders (TPOs), an order made by a local planning authority to protect specific trees, groups of trees or woodlands. An Order prohibits the cutting down, topping, lopping, uprooting, damage or destruction of trees without the local planning authorities written consent.

In addition to TPOs, sites may also encounter trees which are due to remain as part of a planning condition / client requirement.

In any case, the following **must** be strictly followed.

- Ensure nesting birds / habitats are not disturbed at all
- Keep vehicles and plant well away from the defined root protection area
- Install fencing to create a physical boundary around the trees
- Do not cut or damage any roots greater than 25mm in diameter within the protected area
- Wrap damp sacking around any exposed roots until ready for backfilling
- Backfill with care, ensuring roots are not damaged, and compact backfill lightly
- Do not store spoil or building materials within the protected area
- Keep toxic materials such as diesel and cement away



2. Existing Environmental Features > Invasive Weeds

[Useful documents / guidance](#)

Invasive weeds are a species of plant that are not native to a specific location. They have a tendency to spread, causing damage to the environment, human economy and the structural integrity of buildings / bridges.

Each weed comes with its own specific problems and specialist advice **must** be sought when an invasive weed has been identified. If an unexpected discovery, it **should** be added to the sites hazard identification & risk assessment document and the risk and opportunities register. **Any incidents should be reported through SHE Assure and the Compliance team notified.**

The following actions are illegal when it comes to all invasive weeds:

- ✗ Plant or encourage the growth of invasive weeds. This includes moving the surrounding soil that may contain seeds or plant material, unless part of a documented remediation strategy
- ✗ Double handle material suspected of containing invasive weeds
- ✗ Stockpile material suspected of containing invasive weeds within 10m of a watercourse
- ✗ Track plant or equipment through invasive weeds

Should invasive weeds be discovered on your site, you **must**:

- ✓ Immediately stop all work within 7m of the suspected areas and contact the Compliance team
- ✓ Seek immediate medical advice if you come into contact with it
- ✓ Contact your client or the clients agent immediately



Giant Hogweed



Japanese Knotweed



Himalayan Balsam



2. Existing Environmental Features > Protected Species

[Useful documents / guidance](#)

Protected species are certain species of plants, animals and all wild birds that are protected by law. Each protected species comes with their own difficulties and specialist advice **must** be sought. If an unexpected discovery is found, it **must** be added to the sites hazard identification & risk assessment and the risk and opportunities register.

The following actions are illegal when it comes to all protected species:

- ✗ Kill, injure, touch or capture any protected species
- ✗ Take, damage, destroy or disturb any protected species habitat
- ✗ Move any plant and equipment where protected species may be habituating

Should protected species / habitats be discovered on your site, you **must**:

- ✓ Immediately stop all work within 7m of the suspected areas and contact the Compliance team

Failure to adhere to the above could result in a £5,000 fine per animal and up to 6 months in prison for those found to be guilty

Any finds should be reported through SHE Assure and the Compliance team notified, the report should include details on actions taken to ensure the species and its habitat are not damaged and any lessons learnt.



Bats



Badgers



Great Crested Newts



Adders



2. Existing Environmental Features > Archaeology

[Useful documents / guidance](#)

Archaeological sites / artefacts can present hazards that are often underestimated as a business / project risk, and overlooked in the design stage of a project. Artefacts are irreplaceable, non renewable and require protection. Their presence provide many benefits to the UK:

- They form part of our national heritage and are protected under heritage law
- They make a significant contribution to education, social cohesion and the economy
- They provide wide public benefits
- They underpin UK tourism / heritage industries and create jobs
- They play a role in the reservation of an area by invoking a sense of cultural identity

Should you unexpectedly discover an object that may be significant, you **must ensure:**

- work is stopped immediately and the find is not disturbed
- the area is cordoned off and no access is given to the area
- the client or the clients agent are informed immediately
- the discovery is reported to the Police
- **any findings are reported through SHE Assure and to the Compliance team**
- be prepared for more discoveries

The benefits to EWG from protecting and retaining such sites / artefacts are:

- **Sustainability** – It demonstrates our commitment to sustainability.
- **Reputation** – It could lead to positive publicity / involvement with the community if well protected and managed.

Failure to identify / manage could lead to planning constraints, programme alteration, change in working methods, additional testing / requirements and increased costs.



2. Existing Environmental Features > Surface Water

[Useful documents / guidance](#)

Construction / maintenance activities in or near water are among the most high risk activities we do. They have a risk of causing serious impacts on the bed and bank of a watercourse and on the quality and quantity of water. Dust, debris, silt and wastewater are the most common pollutants produced when working near surface water.

Preconstruction information and any ecology reports should provide you with all the necessary information on the location of vulnerable geological features such as watercourses. This information should be used to ensure:

- Consents are in place with the required authorities / governing bodies prior to our commencement date on site
- Fuel storage and refuelling of machinery are sited 30 feet from any body of water
- Risk Assessments & Method Statements have been developed to incorporate the risks and mitigation measures into subcontractor works. These **must** be adhered to at all times and any major changes to the method statement **must** be discussed with the EA for high risk works
- A containment system design is in place to reduce the risk of pollution from our work (the type of containment will depend on the sensitivity of the site)



2. Existing Environmental Features > Drainage

[Useful documents / guidance](#)

There are two main types of drainage system we need to be aware of:

Foul drainage – carries used water from toilets, sinks, basins, baths, showers, dishwashers and washing machines to a sewage works for treatment, before being discharged to a watercourse.

Surface water drainage – carries uncontaminated rainwater from hard surfaces directly to a river, stream or soakaway.

If applicable, sites must:

- Produce a drainage plan which is readily available and clearly distinguishes between surface and foul water drains
- Ensure nothing except clean rainwater enters the surface water drainage system
- Store materials and plant away from drains (generators, pumps, paint, stockpiles, fuel)
- If discharging is required to a foul sewer, ensure there is an agreement in place with the sewerage undertaker
- Protect drains from pollution using silt traps or similar, particularly if site run off could enter the drainage systems
- Have an emergency preparedness plan and an environmental response register

Note: Detergents described as bio-degradable are not suitable for discharge to surface water drainage systems.



2. Existing Environmental Features > Groundwater

[Useful documents / guidance](#)

Groundwater is all water in the saturation zone and in direct contact with the ground or subsoil. Although a hidden asset, groundwater is a vital resource with many different roles including supporting river flows and providing approximately 30% of the UK with fresh drinking water.

Groundwater is coming under increasing pollution pressure from gasoline, oils, hazardous waste, chemicals, storage tanks and septic tanks, potentially leading to devastating environmental changes.

As well as the significant environmental impacts, presence of groundwater can impact on your projects, for example, during piling operations

Sites should initially assess the existing groundwater levels and any fluctuation to the levels brought about by seasonal change, new construction, excavations and other related activities.



If applicable, sites **must**:

- Have a dewatering strategy in place which could involve over pumping or discharge to sewer surface water or the ground
- Sites **must** have the correct permits in place for their dewatering strategy
- Test the water quality if required
- As a last resort arrange for the water to be taken off site in tankers



2. Existing Environmental Features > Contaminated Land

[Useful documents / guidance](#)

Contaminated land is usually found where there is a redevelopment of land that was used previously for commercial or industrial activity. The level of contamination will depend on the quantity or type of solid / liquid waste that has permeated the ground. This will be detailed through either a planning condition or ground investigation report.

Managing contaminated land involves three stages:

1. Identification of risks (humans, environment, watercourses, ecosystems and property)
2. A review of remediation options. Determine the most appropriate remediation strategy following the CL:AIRE protocol to reduce those risks to an acceptable level so the land is suitable for its intended use
3. Implementation of the preferred remediation strategy



The following **must** all be adhered to when dealing with contaminated land:

- The land **must** be initially tested to determine the contaminants and therefore the remediation strategy
- The remediation strategy **must** be signed off by a contaminated land specialist. This information **must** be included within the subcontractors RAMS. A watching brief may be required, if it is a planning condition, there will need to be a final sign off
- Stockpiling of materials should be avoided. Where required, contaminated material **must** be placed on impervious ground and covered
- Where excavated material is to be removed as waste, site **must** follow hazardous waste regulations and the EWG duty of care procedure
- A wheel wash facility for vehicles passing through the contamination **must** be installed
- Permits and registration exemptions may be required for plant and movement of the material

3. Site Management

**Induction &
Communication**

Pollution Prevention

**Emergency Response
- Spills**

**Emergency Response
- Remedies**

Statutory Nuisance

Housekeeping

Plant Use

Energy Management

Water Management

Pests

Flooding

**Environmental
Inspections, Audits
& Assessments**



3. Site Management > Induction & Communication

[Useful documents / guidance](#)

Induction

All staff and subcontractors working on site **must** undergo **formal induction** prior to entering site. During the induction, all relevant environmental information **must** be briefed.

- Use the site specific **Hazard Identification & Risk Assessment** to identify specific site environmental concerns, including for example, neighbouring properties or presence of protected species
- Cover the **Emergency Action Plan** and **Spill Response Plan** including reporting lines and location of nearest spill kits

Communication

Toolbox talks are a great way for site management to communicate and record briefings to site staff. They should be used to reinforce the basics including control measures for potential hazards identified in the site Hazard Identification and Risk Assessment or to inform operatives about any changes to site working conditions.

Should an incident occur, evidence of toolbox talk delivery to operatives could be used in a court of law, reducing our liability.

They are also essential pieces of evidence which could be requested by the Environment Agency or provided in sustainability assessments such as BREEAM.

The suite of toolbox talks forms part of EWG's continuing efforts to create an increased awareness of environmental and sustainability issues.

Important environmental alerts are issued via **SHEQ bulletins** to communicate urgent environmental information and **should** be briefed to staff and displayed on noticeboards.



3. Site Management > Pollution Prevention

The construction industry contributes the greatest number of significant pollution incidents. Pollution from site activities can occur from a variety of sources to a number of receptors.

Each pollution incident is an offence and can result in business and individual prosecution as well as environmental damage and reputation loss. **All incidents must be reported through SHE Assure and to the Compliance team.**

However, most cases are avoidable, given careful planning of operations and responsible management. This can be evidenced by completing the Hazard Identification and Risk Assessment template.

A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Air" in bold black text.A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Silt" in bold black text.A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Concrete" in bold black text.A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Chemicals" in bold black text.A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Oil" in bold black text.A rectangular button with a light gray gradient and a subtle drop shadow, containing the word "Refuelling" in bold black text.

3. Site Management > Pollution Prevention > Air

[Useful documents / guidance](#)

As a whole, the construction industry is a major source of pollution, responsible for approximately 4% of all particulate emissions.

This is mainly due to the number of activities that contribute to global emissions including; land clearing, operation of plant, demolition, dust, working with toxic materials, construction in general and waste production.

There are some emissions that are necessary in order for us to do our job, but there are also emissions which we can reduce by ensuring:

- Vehicle idling is **prohibited** and **policed**
- All vehicles and equipment is **maintained** so exhaust emissions do not breach statutory limits
- Vehicle exhausts are positioned at sufficient height to ensure the dispersal of emissions
- Efficient generators are procured when required, consider the use of solar pods or hybrid generators
- Mains power to site cabins is established early in the programme to reduce the requirement for generators
- Strategically plan deliveries
- All incidents **must** be reported through SHE Assure and to the Compliance team.



3. Site Management > Pollution Prevention > Silt

[Useful documents / guidance](#)

Silt pollution is a major cause of environmental incidents as when it enters a watercourse it can destroy aquatic life and can cause flooding by blocking culverts and channels.

When undertaking activities where silt is an issue, any measures to prevent silt in the first instance are favourable and carry less risk and costs.

Silt pollution can be caused and controlled by the following:

Disturbance of a river bed or bank – The EA **must** be contacted to obtain appropriate permits / consent and discuss appropriate pollution control measures when working near a river bed or bank.

On site working – The movement and maintenance of plant on site can generate silt. Site roads and river crossings carry a high risk. Reduce the risk by procuring roadsweepers to clean roads, using existing bridges for river crossings and working away from the bank where possible.

Dewatering – Problems can be minimised / avoided by; preventing water entering excavations, using pump sumps in excavations, using settlement / filtration tanks. The relevant permits need to be in place for the discharge of water from excavations.

Run off from exposed ground and stockpiles – Minimise the amount of exposed ground and soil stockpiles, only remove vegetation from areas where it is necessary, seed or cover stockpiles, use silt fences, collect run off in lagoons and allow it to settle before disposal.

Wheel and plant washing – Site roads and vehicle / wheel washing carry a high risk of causing pollution. Control measures to be considered include; washing vehicles in a designated area and collecting run off in a sump and discharging of contained water into a foul sewer (with consent from the utility / sewage company).

All incidents **must be reported through SHE Assure and to the Compliance team.**



3. Site Management > Pollution Prevention > Concrete

[Useful documents / guidance](#)

Fresh concrete and cement are very alkaline and corrosive. If they are released into watercourses or ground water they can cause serious pollution.

According to the EA website ***“If you pollute, you could get an unlimited fine, go to prison for up to 5 years, or both. You may also have to pay for the whole cost of the clean-up. There could be further costs such as paying compensation to third parties, higher insurance premiums or loss of contracts.”***

In order to minimise the risk of pollution occurring, any activity involving the mixing and use of concrete **must** be undertaken with the provision of a concrete wash out.

When setting up a concrete mixing / wash facilities:

- Ensure it is sited a minimum of 10 metres from any watercourse or surface water drain
- There **must** be a contained area for washing out and cleaning of concrete batching plant / ready mix lorries
- Collect wash waters and, where necessary, discharge to the foul sewer (you **must** have permission from the local sewerage undertaker for this), or contain wash water for authorised disposal off site
- Wash waters from concrete and cement works **must** never be discharged in to the water environment

All incidents **must** be reported through SHE Assure and to the Compliance team.



3. Site Management > Pollution Prevention > Chemicals

[Useful documents / guidance](#)

Chemicals are one of the most common pollutants. The clean up operation can be difficult and expensive. It can also affect more than just your site.

Storage

- Ensure chemical storage is secure
- Store on an impervious base
- Use secondary containment capable of holding 110% of the volume stored
- Store well away from any high risk receptors – water courses etc.
- Keep a spill kit at the storage area
- Ensure all containers are clearly labelled with their contents
- Remove any empty or damaged drums or containers

Biodegradable oils

- Using biodegradable hydraulic oils in plant can reduce the damage caused should a spill occur. This is particularly relevant when working in or near watercourses
- Although biodegradable oils are less toxic than synthetic oils, they should still be handled in the same way to minimise the risk of spill in the first instance

All incidents **must** be reported through SHE Assure and to the Compliance team.



3. Site Management > Pollution Prevention > Oil

[Useful documents / guidance](#)

Oil is one of the most common pollutants. The clean up operation can be difficult and expensive. It can also affect more than just your site.

Ensure oil storage is:

- Secure
- On an impervious base
- Has a secondary containment system such as a bund
- Capable of containing at least 110% of the volume stored
- Above flood water level
- Away from high risk locations
- At least 10 metres from a watercourse

In addition, you **must** ensure:

- Ancillary equipment is being used when refuelling
- Damaged, leaking or empty drums are removed from site immediately via a registered waste disposal contractor
- Spills kits and other products such as sand are stored closed to oil storage
- Staff are trained on how to use spill kits effectively
- Necessary documents such as refuelling procedures, emergency response registers and spill response plans are displayed
- Incident response training has been provided to staff and operatives
- Relevant procedures and a risk assessment is included within RAMS.

All incidents **must** be reported through SHE Assure and to the Compliance team.



3. Site Management > Pollution Prevention > Refuelling

[Useful documents / guidance](#)

The risk of spilling fuel is at its greatest during refuelling. Ensure that a refuelling plan is in place and reinforced through delivery of tool box talks.

To minimise the risk:

- All refuelling activities should be covered by RAMS
- Refuel well away from any high risk receptors – water courses etc.
- Keep sufficient spill kits along with sand, earth or commercial products for containment at the storage area
- Re-fuel mobile plant in a designated area, on an impermeable base away from drains or watercourses
- Use a bunded bowser and position drip trays / plant nappies appropriately
- Supervise all refuelling and bulk deliveries
- Check the available capacity in the tank before refuelling
- Don't jam open a delivery valve
- Check hoses and valves regularly for signs of wear
- Turn off valves after refuelling and lock them when not in use
- Provide incident response training to your staff and contractors
- **Train staff on the refuelling process**

All incidents **must** be reported through SHE Assure and to the Compliance team.



3. Site Management > Emergency Response - Spills

[Useful documents / guidance](#)

In the event of a spillage, site management are responsible for ensuring that the **spill response procedure** and the **emergency response plan** are implemented.

This includes:

- Taking immediate actions to stop the spillage reaching a drain or watercourse
- If possible, soaking up the spillage using the sites spill kits / imbibers beads

All incidents **must be reported through SHE Assure and to the Compliance team.** An investigation should be carried out by the site management, and where necessary with the EWG Environmental Manager, to determine the root cause and lessons to be learned.



3. Site Management > Emergency Response - Remedies

[Useful documents / guidance](#)

These should only be needed in the event of an emergency, control measures **must** be in place as determined when completing the Environmental Hazard Identification and Risk Assessment.

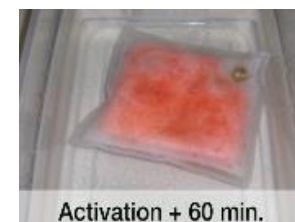
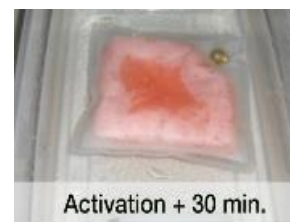
Ensure the correct spill kits / imbibers are ordered, readily available and accessible to staff where machines are operating or refuelling.

Spill Kits

- **Ensure** there is a supply near the refuelling area
- A small kit **must** be held in mobile plant
- **Ensure** it is the correct spill kit for the fuel being used
- **Ensure** people are trained to use them
- **Ensure** emergency preparedness plans are displayed
- **Ensure** spill response plans are displayed

Imbibers

- Removes hydrocarbons, leaving only water behind (useful product for interceptor trays)



3. Site Management > Statutory Nuisance

Statutory nuisance is covered under the Environmental Protection Act 1990, and is defined as anything that unreasonably affects a persons health or causes disturbance. Abatement notices can be served by local councils, with penalties including fines, confiscation of equipment, site injunctions and even prison sentences for responsible parties.

Any notices issued **must** be reported through SHE Assure and to the Compliance team.

Noise

Vibration

Dust

Odour

Light

3. Site Management > Statutory Nuisance > Noise

[Useful documents / guidance](#)

Noise is considered a nuisance if it causes substantial interference or the ability to cause harm. Should noise levels reach unacceptable levels, local councils and Environmental Health Officers can serve sites with abatement notices, restricting or stopping site works. Those failing to comply with the notice can be prosecuted further.

Sites **must** identify high risk operations and locations through Hazard Identification and Risk Assessment and mitigate noise at either source or receptor through the following methods:

- Keep locals and the local Environmental Health Officer informed
- Shield noise activities with acoustic screens
- Ensure equipment brought to site has noise limits
- Use alternative construction methods
- Work within agreed planning constraints and reduce weekend work
- Control delivery times and drop off areas
- Choose a suitable compound location
- Monitor noise using correctly calibrated equipment
- Ensure vehicles are switched off when not in use (no idling)
- Ensure induction content covers the expectations of site personnel
- Open a channel of communication with the public, keeping them informed of our works and what they can expect

All complaints made **must** be logged following EWG-Q-MP-20 – Customer feedback procedure.



3. Site Management > Statutory Nuisance > Vibration

[Useful documents / guidance](#)

Vibration can cause a wide range of issues from nuisance to structural damage of adjacent buildings. Sites with excessive vibration can be subjected to abatement notices, given by the Environment Agency or local Environmental Health Officer. Those failing to comply with the notice can be prosecuted and receive fines and prison sentences.

Sites **must** identify high risk operations and locations through Hazard identification and risk assessment and mitigate vibration through the following methods:

- Eliminate the amount of vibration at the design stage by using pre-fabricated components or an alternative process
- Select low vibration tools and equipment
- Ensure tools are being used correctly and are efficient for the task that is being undertaken
- Work within agreed planning constraints and reducing weekend working
- Control delivery times and drop off areas
- Choose a suitable compound location
- Monitor vibration using correctly calibrated equipment to ensure compliance
- Ensure vehicles are switched off when not in use (no idling)
- Ensure induction content covers the expectations of site personnel
- Open a channel of communication with the public, keeping them informed of our works and what they can expect

All complaints made **must** be logged following EWG-Q-MP-20 – Customer feedback procedure.



3. Site Management > Statutory Nuisance > Dust

[Useful documents / guidance](#)

Dust can be a major issue during construction and demolition work; causing health issues from poor air quality. Activities such as excavation, deliveries and plant movements can all cause excessive dust levels. To determine whether the dust is a nuisance, local councils / authorities consider the following:

- The amount of dust being generated and it's affect on nearby properties
- How often dust is being generated
- Whether the dust is affecting a persons enjoyment of their property
- The protection measures on site to reduce the dust

Where dust is an issue, sites **must** develop a dust control strategy and monitor dust. The strategy should include mitigation / reduction measures. These measures could include:

- Providing adequate screening and damping down during dust generating activities
- Applying site speed restrictions
- Scheduling deliveries to avoid standing traffic on routes to site
- Providing wheel washing facilities where viable
- Storing materials away from site boundaries and sensitive receptors
- Use of diamond cutting blades and extraction equipment such as vacuums.
- Avoid dry sweeping
- Use of enclosed or sheeted vehicles
- Procure a road sweeper – Collect waste transfer notes and licences following the duty of care procedure

All complaints made **must** be logged following EWG-Q-MP-20 – Customer feedback procedure.



3. Site Management > Statutory Nuisance > Odour

[Useful documents / guidance](#)

Odour can be classed as a statutory nuisance if it is unreasonable and substantially interferes with the use or enjoyment of an area, or has the potential to impact health. The nuisance can be caused by a variety of processes. To determine whether the smell is a nuisance, local councils / authorities consider the following:

- The origin and characteristics of the smell
- The number of properties and people affected
- The character / heritage of the area
- The affect on the quality of life nearby
- How often the smell is present

Sites **must** ensure as a minimum:

- Toilet blocks are positioned away from sensitive receptors
- Feminine hygiene waste is segregated from all other waste and is removed on a regular basis following the duty of care procedure
- Canteen waste is segregated from construction waste from all other waste and is removed on a regular basis following the duty of care procedure
- Any spills are cleaned and reported immediately

Councils must serve abatement notices to sites where nuisance has happened, is happening or will happen in the future. An abatement notice requires the site to stop or restrict the smell.

All complaints made **must** be logged following EWG-Q-MP-20 – Customer feedback procedure



3. Site Management > Statutory Nuisance > Light

[Useful documents / guidance](#)

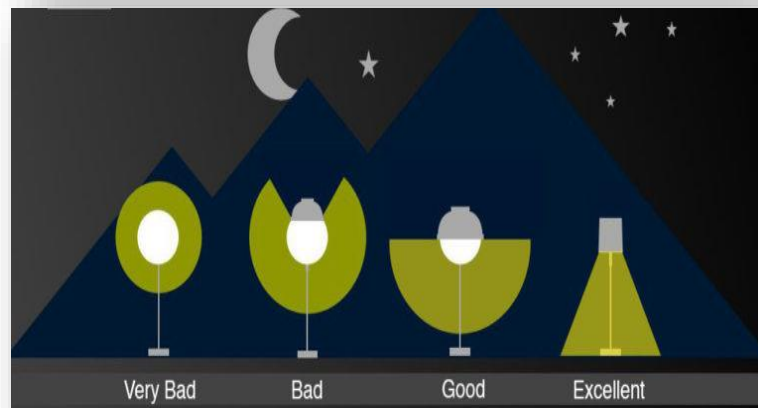
Light pollution is not always considered a nuisance, but can have significant adverse effects such as:

- Impacts on the health and wellbeing of people by disrupting body cycles regulated by darkness and light. Sleep disorders, increased stress and certain types of cancer are believed to be developed from artificial lighting
- Disruption of breeding patterns of nocturnal animals, insects and the migration of birds

Light pollution can be a particular problem for our sites where new or temporary lighting is installed to provide safe working conditions and security. The following measures should be considered / adopted when providing site lighting.

- All lighting should be situated to provide enough lighting as necessary for work and no more
- Lighting should face downwards so it does not affect local premises
- Screening of lighting and effective programming of works
- Type of lights used for security

All complaints made **must** be logged following EWG-Q-MP-20 – Customer feedback procedure



3. Site Management > Housekeeping

[Useful documents / guidance](#)

Organised, tidy sites are safer and easier to manage. They not only reduce the risk of both health & safety and environmental incidents occurring, they can ensure quality is achieved, generate cost savings and improve the image of our site, which will in turn, improves our image as a business.

Consider the following:

- Are subcontractors aware our housekeeping expectations while working on our sites?
- Are materials stored and handled efficiently by subcontractors?
- Are the materials brought to site by subcontractors the specified materials? Have we checked this upon delivery and obtained a copy of the delivery ticket for our records?
- Are our subcontractors clearing away all their flammable waste materials (such as packing and timber off cuts) to a designated place?
- Are work areas cleared of waste regularly to reduce trip hazards, dust and improve housekeeping?
- Are wheelie bins or chutes being used to enable waste materials to be brought out of the building?
- Are waste materials stored safely before their removal from site?
- Are waste materials being regularly removed from site?
- Are regular housekeeping inspections carried out to ensure high standards are being maintained?



3. Site Management > Plant Use

[Useful documents / guidance](#)

The use of static and mobile plant on site can cause environmental issues through noise pollution, air pollution, potential for spills and potential to damage existing features such as trees.

To reduce the risk:

- Ensure that any plant used is well maintained, calibrated correctly and arrives with MOT's as appropriate
- Ensure plant is energy efficient
- Ensure plant nappies are in use to reduce the risk of spills
- Where plant is not in use, ensure they are switched off and plant nappies are placed underneath to catch any spills
- Liaise with the local council Environmental Health Officer (EHO) if necessary
- Install noise screening techniques where viable
- Monitor noise on site to ensure we are within acceptable limits
- Ensure no machines are in use prior to the time specified in your sites planning application
- Open a channel of communication with the public, keeping them informed of our works and what they can expect



3. Site Management > Energy Management

[Useful documents / guidance](#)

The purchase of energy is a significant cost to the Group. With the cost of energy rising, the amount we spend annually will only increase unless we address energy management. Greater energy efficiency can reduce demand, reduce costs and lower emissions.

Below are some examples for consideration:

- If feasible, connect to the main electricity grid, rather than running your site off diesel powered generators.
- Carry out energy audits of owned assets
- Create action plans to reduce energy usage
- Ensure site cabins are energy efficient
- Shut off generators when they are not required (overnight / weekends) or consider having them set on a timer for operational hours only
- Turn off lights if they are not on sensors
- Shut down your laptops / tablets at the end of the day and unplug any chargers when they are not in use
- If heating is on, ensure windows and doors are closed
- Only use the dishwasher when full
- Procure the most efficient white goods

Report your energy usage at the end of each month through either a KPI return or CSR return.



3. Site Management > Water Management

[Useful documents / guidance](#)

Water is a valuable commodity, especially in times of drought which are now becoming more common due to climate change.

Reducing the amount of water we use is important both as a cost saving opportunity and to reduce carbon emissions.

Below are some examples for consideration:

- Installation of flow restrictors
- Installation of dual flush toilets
- Rainwater harvesting
- Procurement of more efficient systems
- Improved leak detection
- Fixing leaks sooner
- Carrying out water audits of owned assets
- Creating actions plans to reduce water usage
- Using treated / recycled water where viable

Report your water usage at the end of each month through either a KPI return or CSR return.



3. Site Management > Pests

[Useful documents / guidance](#)

Pests can be a common risk in a variety of projects we work on.

Demolition

Demolition of buildings containing a pest infestation can result in a dispersion of these pests into the surrounding area and may also result in the same pests infesting the new buildings.

Prior to the commencement of any demolition work, individual blocks, properties and the surrounding area **must** be surveyed by professional pest control staff in order to identify the presence and extent of any infestations. Where infestations are identified, appropriate treatments **must** be implemented by the client to eliminate the infestation before demolition.



Drainage systems

Pests can enter buildings through breaks and faults in the drainage system. Capping, grubbing up or temporary sealing may be necessary and may prevent access from pests.

Site housekeeping

Contractors **must** ensure that construction sites are kept as clear and tidy as possible. Accumulation of building materials can act as harbourage for pests, and **must** be removed and disposed of promptly and safely. Staff should not leave food waste on site as this will encourage pests to become established. Ensure food waste is disposed of in regularly removed wheelie bins.

Contact the Compliance team for further support. We use the Local Council services or a specialist contractor to deal with pests.



3. Site Management > Flooding

[Useful documents / guidance](#)

The UK has been exposed to a rapid increase in the number of flooding incidents due to climate change. In years to come, the number of incidents is likely to increase further and therefore, site management **must** prepare in advance.

The first step is to understand the site location and surroundings. You **must** identify watercourses in close proximity to site and be aware of any other bodies of water in the wider surrounding area. If your site is at risk of flooding this should be identified during the completion of the Environmental Hazard Identification and Risk Assessment.

For further local information flood maps can be used to check site risks. These can be accessed through the Environment Agency website free of charge.

The Environment Agency issues flood warnings and it is advised you subscribe to their free email or text alerts.



In the event your site is at imminent risk of flooding, instigate the following initiatives.

- Use sandbags to prevent flood water entering the offices and construction building if close to handover
- Move equipment and chemicals to a safer area
- Place sandbags in toilet bowls to prevent sewage backflow
- Move plant and materials to higher levels
- Turn off the electrical supply

Remember, the most **important action** you should take is **evacuation** of site, ensuring every operative and member of staff reaches a safe point. Upon returning to site, be aware there are still hazards as a result of flooding. These can be found in the 'Useful documents / guidance' section.

3. Site Management > Environmental Inspections, Audits & Assessments

[Useful documents / guidance](#)

Environmental Inspections & Audits

Regularly inspecting your site will ensure conformance to internal policies, procedures and legislation / regulation and ensure your site is mitigating / reducing the risk associated with the project. It is an integral part of our management system and allows for intervention, where issues are identified.

The Compliance team will periodically attend site during the course of the project to carry out inspections / audits of the site works and associated records. The inspections / audits are carried out for a variety of reasons:

- As staff who don't attend your site daily, we have the capacity to give you an alternative view of your site activities and potentially see things that you don't
- We assess the Groups level of compliance with legislation, policies, procedures, environmental management systems and environmental assessments
- It allows us to find and analyse trends within the business, without this knowledge, we could not improve

External audits are carried out annually by an independent body. Sites are chosen at random and these audits determine whether we achieve / re-certify our ISO accreditation.

Sustainability Assessments

Projects may be subject to assessment methods such as BREEAM or BREEAM Infrastructure as part of planning, client or funding requirements.

These assessments evaluate projects against a variety of criteria across different sections including; management, health & wellbeing, energy, waste, ecology, pollution, water and materials. They have a major impact on the design and construction phase of any development.

The Compliance team can assist with the environmental assessment requirements. Report these requirements to the Compliance team at an early stage.



4. Waste

We are committed to ensuring that best waste management practices are used on our projects. As costs of raw materials and waste disposal continue to rise, there is scope for significant savings.

Legal Duty of Care

**Waste Forecasting &
Reporting**

Waste Minimisation

**Waste Storage &
Segregation**

**Waste Container
Selection & Ordering**

**Waste Roles &
Responsibilities**

Demolition Waste

Excavation Waste

**Waste from
Construction
Activities**

**Canteen & Office
Waste**

Hazardous Waste



4. Waste > Legal Duty of Care

[Useful documents / guidance](#)

Waste duty of care records are a legal requirement and failure to comply could result in prosecution. Please be aware of your responsibilities as ignorance is not acceptable.

For compliance you **must ensure waste is:**

- Stored safely
- Handled by authorised people (the transport company **must** have the appropriate waste carriers licence)
- Disposed of at an EA registered waste facility
- A Waste Transfer Note (controlled waste) or Consignment Note (hazardous waste) needs to be fully completed for every load of waste. A season ticket is acceptable for waste streams with regular movements such as canteen waste collected fortnightly
- Any waste exemptions have been applied for and accepted
- **Copies of all licences, permits, exemptions, season tickets and transfer notes need to be saved onto WrightBox and stored for a minimum of 2 years this includes waste removed by subcontractors as part of their package of works**
- **Consignment notes **must** be stored for a minimum of 3 years this includes waste removed by subcontractors as part of their package of works**



**Low Duty of Care Awareness
is Contributing to Waste Crimes**



4. Waste > Legal Duty of Care – Waste Transfer Note

[Useful documents / guidance](#)

Information that legally **must** be included on **all** waste transfer notes (WTN):

- A description of the waste
- Any processes the waste has been through
- How the waste is contained / packaged e.g. skip, wagon, tonne bag, drum etc.
- The quantity of the waste (weight)
- The place and date of transfer
- The name and address of both parties – producer and carrier
- Details of the permits, licence or exemption of the disposal site
- The licence or registration number of the waste producer, if they have a waste permit or registered waste carrier
- The appropriate European Waste Catalogue (EWC) code
- The Standard Industrial Classification (SIC) code of your business
- A statement that the waste hierarchy has been applied

Things to remember:

- WTN's are to be used **only** for non-hazardous waste
- WTN's **must** be retained for 2 years
- Annual WTN's (season tickets) can be used for **regular transfers** of the **same type** of waste by the **same waste carrier**

Kenny Waste Management Ltd
Worsley Trading Estate, Lester Road, Manchester M38 0PT
Tel: 0161 790 3737 Fax: 0161 799 7811
national@kennywastemanagement.co.uk www.kennywastemanagement.co.uk

Waste Management Licence No. EAWML/50155
Waste Carriers Licence No. CB/076122

Duty of Care - Controlled Waste Transfer Note

Waste Carrier Licence: CB/076122
Waste Management Licence:
- Worsley Trading Estate, Lester Road, Little Hulton, M38 0PT

Annual Waste Transfer Note - valid for 12 months from:
Date: 24/06/2021 Job Number: 1629438

Waste Producer
ERIC WRIGHT CONSTRUCTION LIMITED
Broughton House, Park Lane, Salford, M7 4JD

Grade & EWC
Mixed Construction & Demolition Waste - 17 09 04

SIC Code: 41201 Load Details:
Order Details Driver Notes:
E/R 12 (Open) Adam Pickford 07583 970514 / Tom Kerfoot
PO: PO/EWC/51001 07483 141148 / Steven 07585 169480
Contact:

Time On Site 15:03 Time Off Site 15:36

Waste Producer Signature
Print Name Adam
Signing represents total acceptance of all the Terms and Conditions

I (the customer) do hereby declare that the service contracted for as defined above has been carried out to my complete satisfaction. I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011. Signing represents acceptance of the Terms and Conditions.

Waste Carrier
KENNY WASTE MANAGEMENT LTD
Worsley Trading Estate, Lester Road, Little Hulton, M38 0PT

Waste Receiver
KENNY WASTE MANAGEMENT LTD
Worsley Trading Estate, Lester Road, Little Hulton, M38 0PT

Registration Number: CB/076122 Registration Number: EAWML/50155
Vehicle Registration: MV19 SZU
Driver Name: John Townsend

Carrier Signature John Townsend Receiver Signature Neil Mackey

VAT number: 437 7018 45
Company registration number: ENGLAND 3849027
Please visit <http://www.kennyskiphire.co.uk/Terms/> for full terms and conditions.
No asbestos, hazardous wastes, fridges, freezers, oils, tyres or electrical items. The customer warrants that all the requirements of the environmental protection act and subsequent regulation is complied with. You must not overfill the container, level fill only. We accept no liability for any damage caused if a customer requests us to site the skip off the public highway. The customer is responsible for any permissions and lighting during hours of darkness and for any loss of or damage to the container.



4. Waste > Legal Duty of Care – Consignment Note

[Useful documents / guidance](#)

Information that legally **must** be included on a consignment note (Parts A - E):

Part A

Completed by the producer of the waste / holder of the waste (can be completed by the waste contractor on our behalf), **must** include:

- Unique consignment note code
- Name, address, telephone number and email of where the waste is to be removed from
- Name and address of where the waste is to be taken to
- Name, address, telephone number and email of the waste producer, if it is different to where the waste is to be removed from

Part B

Completed by the producer of the waste / holder of the waste (can be completed by the waste contractor on our behalf), **must** include:

- A description of the process that created the waste
- A standard Industrial Classification (SIC) code
- Waste details
 - Description
 - European Waste Catalogue (EWC) code
 - Quantity (in kg)
 - Any chemical / biological components (can be identified on the safety data sheet)
 - Physical form (e.g. gas, liquid, powder, sludge, mixed)
 - Hazard code(s)
 - Container type and amount

Note: your waste contractor can help you to complete the details in this section



4. Waste > Legal Duty of Care – Consignment Note

Useful documents / guidance

Information that legally **must** be included on a consignment note continued:

Part C

Completed by the waste carrier, when they have checked parts A and B, **must** include:

- Their name, address and vehicle details
- Details of their waste carriers licence
- Signature, date and time
- If waste is part of a multiple collection include round number and collection number (leave blank if not)

Part D

Completed by the consignor (waste producer), **must** include:

- Their name, address, telephone number and email
- Confirmation that the waste hierarchy has been applied
- Signature, date and time

Part E

Completed by the consignee (the disposal site), **must** include:

- The name, address, telephone and email of the site receiving the waste
- Confirmation that the EWC codes and quantities are correct
- A statement to show if the waste was accepted or rejected
- The recovery or disposal operation to be applied to the waste ('R' and 'D' codes)
- The waste permit / exemption number of the disposal site
- Signature, date and time

Note: Part E will not be completed when the hazardous waste leaves our site, it should be sent through at a later date by the disposal site.

4. Waste > Waste Forecast & Reporting

[Useful documents / guidance](#)

Forecasting waste can have significant benefits for your project. Creating a **Site Waste Management Plan (SWMP)** at project inception is the easiest way to forecast / manage your waste.

Creating a SWMP allows your site to apply waste reduction techniques at the earliest stages of your project and in return, deliver higher cost savings via less waste production.

Recording and reporting waste produced by your site benefits our business and your site. It allows us to:

- Satisfy client requirements
- Achieve development requirements such as BREEAM criteria
- Improve performance by identifying areas where we can reduce waste and therefore save money

The Compliance team log all waste including subcontractor waste for each business unit. This includes demolition, excavation and aftercare waste.



4. Waste > Waste Minimisation

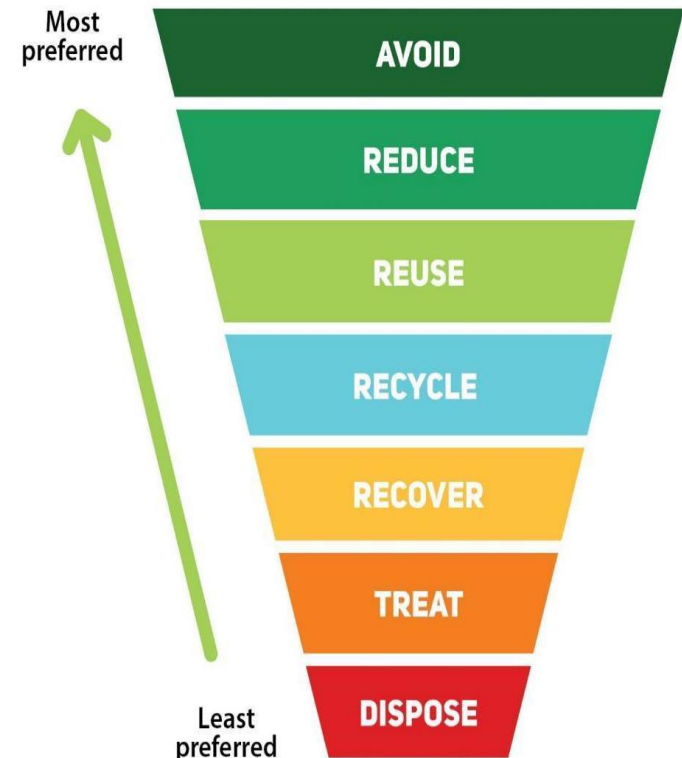
[Useful documents / guidance](#)

Applying waste minimisation techniques at the earliest stage of your project can generate significant cost savings through less waste production and therefore less skips. In addition, your waste could be someone's else raw material.

The best way to do this is to follow the **waste hierarchy**.

Below are a few examples and questions you should be asking yourself and the supply chain.

- Avoid waste coming to site in the first place. For example; packaging is significant towards the final stages of the development. Can you arrange for your supplier of materials to collect the packaging? Can you reduce the amount of packaging coming to site e.g. materials like pallets and cable drums?
- Ensure that materials are not over-ordered and therefore discarded
- Properly stack and store materials in the required conditions ready for use. For example; store plasterboard within a building rather than outside during the winter months
- For inert materials / 6F2, can we re-use materials on site? Is there another Eric Wright site with a shortage of such materials? Does it make financial sense to transport these materials to the site rather than discard the material and procure new material?
- Can subcontractors take any excess materials away for use on other projects?



4. Waste > Waste Storage & Segregation

[Useful documents / guidance](#)

Waste storage areas should be in one location **away from sensitive receptors or hazardous materials** to reduce the risk of contamination.

The waste storage area should:

- be sited as to not obstruct utility service points, access paths, or property entrances
- be sited away from neighbouring property windows, boundary fences or fire exits
- be sited and designed to minimise fire hazards
- be sited on an impermeable surface (if possible) and in a shaded area to reduce the potential for odour pollution
- be of suitable size to contain the produced waste quantities
- have containers that can be covered to protect from adverse weather conditions
- be labelled appropriately
- be inspected daily for any contamination / for good housekeeping

Effective waste segregation has many benefits to our business and the environment:

- Less waste is likely to go to landfill which makes waste cheaper to dispose of as it does not require the same manual or mechanical sorting as mixed waste. It is also better for people's health and the environment
- Better recycling rates reduce the demands on finite resources and the environmental impacts associated with the extraction, harvesting and processing of these resources
- Our carbon footprint is reduced
- It leads to a circular economy, as our uncontaminated waste can be another person's raw material.

On some sites, waste segregation may not be practical for a variety of reasons such as space, number of waste streams or cost benefit of using mixed waste skips. As a minimum, all plasterboard **must** be segregated from construction waste.



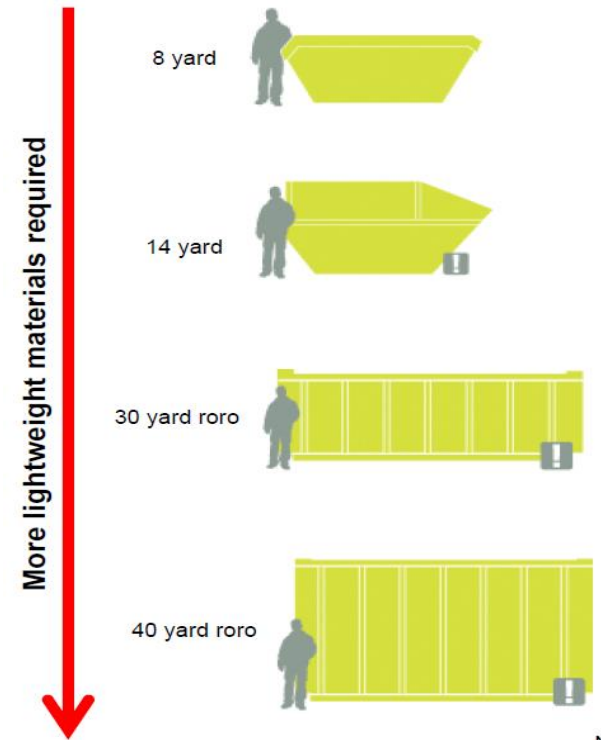
4. Waste > Waste Container Selection & Ordering

[Useful documents / guidance](#)

Skip hire is a critical part of site waste management and key to cost-effective and efficient waste disposal. If your skip is too big, you'll pay for any capacity you don't use and waste valuable space. If it's too small or the wrong type, you could disrupt operations on site, pay more for collections and miss opportunities for recycling. The below **must** be considered

- Using larger skips can result in cost savings – as long as they are filled correctly
- All skips, no matter the size should be filled correctly to reduce costs
- RORO skips should only be filled with **lightweight** materials. Filling these skips with heavy materials will add extra tonnage costs when a certain weight threshold is reached
- Where possible wheelie bins **must** be used to segregate canteen / office waste from construction waste

All ordering **must** be done through the Group Procurement department



4. Waste > Waste Roles and Responsibilities

A nominated individual usually the Project or Site manager is responsible for implementing the following:

- Waste segregation in line with the SWMP requirements
- Ensuring waste forecast / actual waste figures are up to date and monitored
- Waste reporting to the Compliance team where required
- **Ensuring compliance with all duty of care legislation**
- Ensuring best practice on site including housekeeping
- Ordering and exchanging skips / containers when required



4. Waste > Demolition Waste

[Useful documents / guidance](#)

On projects that require high levels of strip-out or demolition, you **must** plan how you could potentially reuse the waste generated. Demolition waste can often be reclaimed and reused. Your waste can also be another person's raw material.

Performing a pre-demolition audit on your site can help you identify any materials that can be recovered and help you manage the materials that can't (asbestos, etc.). The earlier you perform the audit, the better, as this information is invaluable during the procurement process. As a result, the project will save money through disposing less waste and requiring less raw materials.

Examples of material recovery include:

- Using bricks, concrete, rocks and aggregate to increase site levels or to create a noise bund around the development
- Using soil to landscape the area
- Using road planings and rubble to build a temporary surface
- Donating materials such as doors / windows / timber to local charities

If you plan to move materials from one site to another, both sites **must** have a Materials Management Plan (MMP) in place. In addition, the receiving site **must** have a waste exemption in place where it is operated by a third party.

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions that the holder **must** operate within.

All waste movements **must** be accompanied by the relevant duty of care records. This **must** have all the necessary information to identify the waste and **must** be kept for the statutory retention period, this includes waste removed by subcontractors as part of their package of works



4. Waste > Excavation Waste

[Useful documents / guidance](#)

Although many deem excavated materials such as topsoil or stone as a product, excavated materials are considered a waste unless proved in a documented **Materials Management Plan (MMP)**. All projects planning to re-use excavated material **must** have an MMP in place for their operations. They **must** also ensure that any sensitive receptors are protected from silt pollution whilst stockpiling, and ensure dust is minimised.

Projects that require high levels of excavation **must** plan how to potentially re-use the waste generated. There are many benefits to the business and many ways in which we can re-use excavated materials, including:

- Re-using existing materials to make up site levels or temporarily landscape areas of site
- Transferring excavated material to another site for use
- Sourcing local exemption facilities which can use our material (farmers for example). We **must** make sure that the receiver has the appropriate waste exemptions in place. These documents have conditions that the holder **must** operate within. We **must** make sure we are within the conditions specified.



All movement of excavated materials from site **must** be accompanied by the relevant duty of care records. These **must** have all the necessary information to identify the waste and **must** be kept on record for a minimum of 2 years for non-hazardous and 3 years for hazardous waste, this includes waste removed by subcontractors as part of their package of works.



4. Waste > Waste from Construction Activities

[Useful documents / guidance](#)

Waste is an inevitable part of our industry. It can be prevented to a certain degree and minimised, but it will always be a factor in what we do.

Construction waste is any unwanted material we intend to discard that does not require special handling and disposal requirements. Typical waste materials from construction activities could include brick, block, metals, plasterboard, timber, plastics or packaging and includes waste such as road sweeper arising's. Hazardous waste can also be generated through our activities, these are covered in other sections of the toolkit.

Construction waste movements **must** be accompanied by a waste transfer note. This **must** have all the necessary information to identify the waste and **must** be kept on record for 2 years, this includes waste removed by subcontractors as part of their package of works.

The information required **MUST** include:

- A description of the waste
- How the waste is contained or packaged
- The quantity of the waste
- The place, date and time of transfer
- The name and address of both parties
- Details of the permit, licence or exemption of the person receiving the waste
- The appropriate European Waste Catalogue (EWC) code for the waste
- The standard Industrial Classification code (SIC)
- Confirmation that the waste hierarchy has been adopted



4. Waste > Canteen & Office Waste

[Useful documents / guidance](#)

Canteen and office waste **must** be segregated wherever practicably possible from construction waste, using either 660 / 1100 litre wheelie bins. Mixing waste streams can cause contamination to materials that once could have been recycled if segregated, meaning higher removal costs for your site.

For disposal, all movements of waste **must** be covered under a waste transfer note or by a season ticket.

A season ticket is a single waste transfer note that covers multiple transfers of waste of the same description between two parties for up to 12 months. A typical example would be fortnightly collections of your canteen waste wheelie bins.

To obtain a season ticket, simply request one from your waste contractor. Ensure this is filed correctly in WrightBox and renewed after 12 months.



4. Waste > Hazardous Waste

[Useful documents / guidance](#)

Hazardous waste is anything harmful to human health or the environment, including:

- Asbestos
- Electrical equipment (WEEE)
- Oils
- Solvents
- Chemical waste such as batteries and pesticides

You must ensure the following:

- The properties of the waste (flammability, toxicity etc.) are clearly labelled and managed accordingly with the product data sheets
- The waste is stored in leak proof containers away from sources of ignition
- The waste is kept covered to prevent contamination of rainwater
- The leak proof containers are tightly sealed
- The waste is handled by trained person
- The waste is stored on an impermeable surface where possible
- The waste is transported by licenced waste hauliers to treatment or disposal facilities
- Each waste removal is accompanied with a consignment note

All waste movements **must** be accompanied by the relevant duty of care records. This **must** have all the necessary information to identify the waste and **must** be kept on record for a minimum of 3 years., this includes waste removed by subcontractors as part of their package of works.



5. Procurement

Sustainable procurement can help save money, reduce waste, improve competitiveness and build our reputation. All aspects of procurement can assist us in creating a database of suppliers who share our vision / ethos, whilst providing the service we require.

Subcontractor Procurement

**Supplier & Material
Procurement**

5. Procurement > Subcontractor Procurement

We expect our supply chain to support us in achieving ‘best value for money’ for our clients. When choosing subcontractors, the ideal scenario is a combination of whole life costs and benefits considering the environmental, social and economic impact of activities through design, material selection, manufacture, transportation, construction, usage and disposal.

Ensure subcontractors:

- Have been through the pre-qualification process and are approved
- Meet the requirements of the proposed works
- Are competent to achieve the objectives set out by the Group
- Will comply with company environmental procedures and the site Environmental Management Plan (EMP)
- Understand the environmental constraints on our site

Other things to consider:

- Are subcontractors local to the site we are working on to reduce our carbon footprint?
- Will the subcontractor provide additional equipment as standard to minimise disturbance?
- Does the subcontractor have a history of working on similarly sensitive projects?
- Environmental performance on previous projects



5. Procurement > Supplier & Material Procurement

As a business, we should give preference to suppliers that can demonstrate responsibly sourced construction products. Responsible sourcing forms an integral part of schemes such as BREEAM, where suppliers are required to have an Environmental Management System like ISO 14001. As the bare minimum we should be procuring all timber products from legal and sustainable sources as defined by the UK Government Central Point of Excellence on Timber (CPET). Other products you can look at procuring from sustainable suppliers include:

- Concrete
- Plasterboard
- Bricks & blocks
- Insulation
- Steel
- Aggregates

Other things to consider:

- **Locality of supplies** – Using local suppliers can reduce environmental impacts including transport.
- **Packaging** – Reduce the amount of packaging products arrive to site in, or being involved in take back schemes can reduce our carbon footprint and the amount of waste we produce.
- **Plant selection** – Can your supplier source the correct plant for the job we are doing? Is there a better alternative?



6. Reporting

Reporting and analysis of activities is critical to all organisations and none more so than ours.

As a hypothetical example; a site is constructing multiple identical industrial units. A different site manager is responsible for each unit. One project manager notes the concrete specified for the units does not conform to building regulations. The project manager reports this to the other project managers before any concrete is poured. The specification is changed and the development continues.

Without this reporting, the effects to the development / business could be catastrophic. This is exactly the same for environmental reporting. The data enhances our ability to make more informed, evidence based decisions and allow us to identify trends and potential improvements that could be made to the business. The aim is to continually improve.



Incidents



Carbon Emissions

6. Reporting > Incident Reporting

[Useful documents / guidance](#)

Environmental incidents do happen on our sites. Incident reporting is an integral part of our Environmental Management System. We treat it as a learning process; providing us with an opportunity to give stakeholders an insight into our sustainability progress.

Should you have an incident on your site, whether it be discovery of invasive weeds, contact from the public, waste incidents or a visit by regulators such as The Environment Agency, contact the Group Compliance Manager, your line manager and business unit representative immediately and **complete the incident report form on SHE Assure**. Failure to report and act on such incidents could potentially result in an unlimited fine, a prison sentence plus any additional clean up costs and disciplinary costs.

Any incidents must be reported through SHE Assure and the Compliance team notified, the report should include details on actions taken and any lessons learnt.



6. Reporting > Carbon Emissions Reporting

[Useful documents / guidance](#)

Key Performance Indicator (KPI) reporting is vital to our business. Every site needs to return the appropriate information monthly to the Compliance team using **EWG-Q-F-429 – Monthly KPI Return (EWC only)** or **EWG-Q-F-469 – Monthly KPI CSR Return**.

The Compliance team use this data for our business / project reporting requirements:

- Reporting monthly to the Eric Wright Trust
- Mandatory reporting introduced by the government in the form of the Energy Savings Opportunity Scheme (ESOS) and Streamlined Energy & Carbon Reporting (SECR). Failure to report results in fines and a damaged reputation
- Internal carbon reporting schemes such as Carbon Saver which show our commitment to reducing energy and is a great work winning tool
- Client reporting requirements
- Site specific reporting requirements such as BREEAM / BREEAM Infrastructure projects
- Tender bids

In addition to the above reporting requirements, calculating accurate emissions for the business allows for trend analysis. We can find areas within the business we can improve, reducing our bottom line.

It is imperative the Compliance team receive timely, complete and accurate data sets from each site and each business unit.



Useful Links

General

Better Buildings Partnership (BBP)

Low carbon retro-fit tool

British Institute of Facilities Management (BIFM)

The institute for Facilities Management

Chartered Institute of Building Services Engineers (CIBSE)

The institute for Building Services Engineering

Environment Agency (EA)

The UK Government public body for the environment

Environmental Management Toolkit

Link to the toolkit, EWG documents and guidance documents held in the Management System of WrightBox

Institute of Environmental Management and Assessment (IEMA)

The institute for Environmental Management

NetRegs (NI & Scotland)

Environmental guidance for small and medium-sized businesses

Scottish Environmental Protection Agency

The Scottish public body for the environment

Utilities

Carbon Saver

Information on our Carbon Saver Gold certification.

Carbon Trust

A not-for-profit company with the mission to accelerate the move to a low carbon economy

Display Energy Certificates (DECs)

Guidance on Display Energy Certificates

Energy Institute

The professional body for the energy industry

Energy Performance Certificates (EPCs)

Guidance on Energy Performance Certificates

Energy Savings Opportunity Scheme (ESOS)

Guidance on the governments mandatory carbon reporting scheme.

Streamlined Energy & Carbon Reporting (SECR)

Guidance on the governments mandatory carbon reporting scheme.

Waterwise

Leading authority on water efficiency in the UK and Europe

Environmental Building Standards

Building Research Establishment Environmental Assessment Method (BREEAM)

BRE Environmental Assessment Method (for Buildings)

Green Spec

Construction industry guide to 'green' building design, products, specification and construction

SKA Ratings

A refurbishment sustainability assessment method

Waste

Chartered Institute of Waste Management (CIWM)

The institute for Waste Management

CL-AIRE

Industry standard for sustainable land use including Material Management Plans (MMPs)

Industry Council for Electronic Equipment Recycling (ICER)

Information regarding electronic equipment recycling

Recoup

The UK's leading authority on plastics waste management

Waste Resources Action Programme (WRAP)

A government body helping business and individuals reduce waste, use resources efficiently & develop sustainable products

Sustainable Living

2 Degrees Network

The world's leading collaboration platform and service for sustainable business

Cyclescheme

Tax free bikes for work through the Government's Green Transport Initiative.

<http://www.cyclescheme.co.uk/>

Green Commute Initiative

Tax free bikes for work through the Government's Green Transport Initiative.

WWF

Guidance on how to live life more sustainably



Contact Us

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