



Sims Environmental Permitting Environment Management Systems Summary

Sims Group UK Limited (Sims) is a subsidiary of Sims Group Limited, the world's largest ferrous metal, non-ferrous metal and electronics recyclers, with operations in Australia, Europe, USA, Canada, New Zealand, China and South East Asia. Sims services include: Asset Recovery and Management; WEEE; End of Life Fridges; End of Life Vehicles; Abandoned Vehicles; Metal and Plastic recycling.

Sims 'Metal Recycling Facilities' currently operate an internal Environmental Management System (EMS). Sims Metal Management is a brand subsidiary of Sims Group UK Limited.

The scope of the internal Environmental Management System (EMS) has been considered in accordance with Environment Agency Guidance.

Sims Metal Management (SimsMM) has an **Environment Policy** which states that SimsMM will conduct its business so as to minimize harm to the environment and in so doing grow and sustain a culture which recognizes this as fundamental to its viability and prosperity.

Sims also has an effective Safety and Health Policy as well as a Community Policy.

All aspects of the sites operations have been assessed for significance and appropriate **Environment Risk Assessment** has been carried out as part of the Waste Management Licensing and/or Environmental Permitting application process, where relevant. As appropriate, Environment Risk Assessment incorporates Fugitive Emissions Management Plans.

Any complaints received about site activities will be recorded and investigated in accordance with **Complaints Log and Investigation procedure**.

The EMS includes the mechanism to fully investigate environmental incidents and non-conformances in both normal and abnormal conditions and to record any remedial actions that might be taken and how to prevent re-occurrence. All employees are trained in how to report such occurrences including Near Misses and Hazards from both an Environment and Health & Safety perspective via the internal 'Hazrep' system.

Sims operates an internal **Environment Audit Procedure**. The objective of the audit is to provide guidance, advice and promote awareness to site management at all levels to enable site management to ensure that environmental regulatory and company policy / standards are complied with. The audits also act as a means of training relevant personnel.

An important objective of the audit is to promote a system of review and continual improvement.

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The environment audit procedure is controlled and monitored by the SHEC Manager along with a team of dedicated, qualified and experienced Environment Advisors who are responsible for conducting the internal audit as well as providing training, Work Instructions and Internal Guidance Notes to all employees.

All sites have a site specific '**Emergency Contingency and Accident Management Plan**'.

Adequate resource is made available to maintain and improve the EMS. Resources include human resources, organization infrastructure, technology as well as infrastructure.

Key personnel at Site Management level have previously completed **Environment Agency Technical Competence Assessments** or other relevant competence assessment **& Continuing Competence Assessment** as applicable. All staff receive **environmental training** relating to Environmental Best Practice on induction. All staff involved in the operation of manual or mechanical equipment receive the relevant training and are required to follow **Safe Working Procedure** documentation.

All plant and equipment is inspected and maintained in accordance with legal requirements and the manufacturer's recommendations. **Maintenance Records** are kept by site management.

All training received is recorded on a training matrix and includes details of the training provider (internal and external), type and date of training and where required, the date of any refresher training that may be required. Copies of **training records** are kept by Site Management.

Contractors also receive EMS training as well as job related environmental instructions. Work performed by contractors is controlled with application of formal 'Permit to Work' systems.

On closure of a site or surrender of permits, all actions will be carried out in accordance with a **Site Closure Plan**.