

ENVIRONMENTAL POLICY



FOR SWITCHGEAR SUPPORT LTD



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BUSINESS DETAILS

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Correspondence Address	As above
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Facsimile (Fax) Number	+44 (0) 1600 772331
Website	www.switchgearsupport.com
Managing Directors (MD) Name	David Johnson
MD's Mobile Number	+44 (0) 7932 765960
MD's Email	dave.johnson@switchgearsupport.com
Other Directors	Helen Johnson (Company Secretary)

Prepared on behalf of the company by

Business Name	Thomas Safety Services Ltd
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REVISION HISTORY AND CONTROL

REVISION HISTORY

REVISION	CHANGE DESCRIPTION	PAGES	ISSUE DATE
002	Existing environmental statement of intent replaced with a new environmental policy.	N/A	11/07/2016
003	Document format updated, plus amendments made to the Contents Page, Footer, Company Details, Objectives, Revision History and Statement of Intent (date change).	Various	11/07/2017
004	TSS Ltd contact details and logo, document format updated, plus amendments made to the Contents Page, Footer, Company Details, Objectives, Revision History, Hierarchy of Waste Management, Responsibilities, Release of Contaminants, Appendix 3 and Statement of Intent (date change).	Various	11/07/2018
005	Amendments made to the Front Cover, Contents Page, Footer, Revision History and Statement of Intent.	Various	11/07/2019
006	TSS Ltd logo and amendments made to Front Cover, Contents Page, Footer, Revision History, Responsibilities and Statement of Intent. New section added - Environmental Incident Reporting.	Various	27/10/2020
007	Document format updated, hyperlinks updated, plus amendments made to the Contents Page, Footer, Responsibilities, Statement of Intent, Appendix 3 and Revision History.	Various	25/10/2021
008	Hyperlinks updated, plus amendments made to the Contents Page, Footer, Statement of Intent, Responsibilities, Environmental Incident Reporting, Communication & Training, Release of Contaminants, Appendix 3 and Revision History. New sections added - Climate Change and Biodiversity.	Various	25/10/2022
009	Annual review, document format updated, hyperlinks updated, plus amendments made to the Contents Page, Footer, Hierarchy of Waste Management, Objectives, Statement of Intent, Responsibilities, Environmental Incident Reporting, Communication & Training, Appendix 1, Appendix 2 and Revision History.	Various	25/10/2023

DOCUMENT DISTRIBUTION AND CONTROL

DOCUMENT DISTRIBUTION	COPY	DOCUMENT TYPE
Switchgear Support Ltd	001	Paper
Switchgear Support Ltd	002	Electronic
Thomas Safety Services Ltd (secure hard drive)	003	Electronic
DOCUMENT CONTROL		
Except for printed copy 001 (as above) any other printed copies are uncontrolled.		

INTRODUCTION

Switchgear Support Ltd recognise that all organisations have environmental impacts that are associated with their activities, processes, products and services. As a supplier, an employer and a member of the community we understand the importance of identifying and controlling these impacts. We have agreed that a proactive approach to environmental management is needed and to achieve this have established an Environmental Policy and an Environmental Management System (EMS).

The EMS is part of an overall management system and is designed to; develop, implement, review and maintain our environmental policy, so that our objectives can be achieved.

The system includes; structure, planning, responsibilities, practices, procedures and processes. It is also proactive and cyclical in nature, which means that our approach is one of continuous improvement.

The Plan, Do, Check, Act (PDCA) approach

The Plan, Do, Check, Act approach achieves a balance between the systems and behavioural aspects of management. It also treats environmental management as an integral part of good management generally, rather than as a stand-alone system.

The high-level descriptions may vary, depending on the industry or sector being worked in, but a summary of the actions involved in delivering effective arrangements and how they are frequently described is given in the table below under the headings of Plan, Do, Check, Act.

Plan, Do, Check, Act	Conventional health and safety management	Process safety
Plan	Determine your policy/Plan for implementation	Define and communicate acceptable performance and resources needed
Do	Profile risks/Organise for health and safety/Implement your plan	Identify and assess risks/Identify controls/Record and maintain process safety knowledge
		Implement and manage control measures
Check	Measure performance (monitor before events, investigate after events)	Measure and review performance/Learn from measurements and findings of investigations
Act	Review performance/Act on lessons learned	

Plan

- Think about where you are now and where you need to be.
- Say what you want to achieve, who will be responsible for what, how you will achieve your aims, and how you will measure your success. You may need to write down this policy and your plan to deliver it.
- Decide how you will measure performance. Think about ways to do this that go beyond looking at accident figures; look for leading indicators as well as lagging indicators. These are also called active and reactive indicators.
- Consider fire and other emergencies. Co-operate with anyone who shares your workplace and co-ordinate plans with them.
- Remember to plan for changes and identify any specific legal requirements that apply to you.

Do

- Identify your risk profile.
 - Assess the risks, identify what could cause harm in the workplace, who it could harm and how, and what you will do to manage the risk.
 - Decide what the priorities are and identify the biggest risks.
- Organise your activities to deliver your plan. In particular, aim to:
 - Involve workers and communicate, so that everyone is clear on what is needed and can discuss issues, develop positive attitudes and behaviours.
 - Provide adequate resources, including competent advice where needed.
- Implement your plan.
 - Decide on the preventive and protective measures needed and put them in place.
 - Provide the right tools and equipment to do the job and keep them maintained.
 - Train and instruct, to ensure everyone is competent to carry out their work.
 - Supervise to make sure that arrangements are followed.

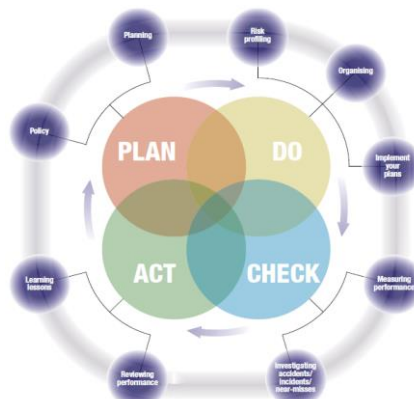
Check

- Measure your performance
 - Make sure that your plan has been implemented - 'paperwork' on its own is not a good performance measure.
 - Assess how well the risks are being controlled and if you are achieving your aims. In some circumstances formal audits may be useful.
- Investigate the causes of accidents, incidents or near misses.

Act

- Review your performance
 - Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other organisations.
 - Revisit plans, policy documents and risk assessments to see if they need updating.
- Take action on lessons learned, including from audit and inspection reports.

The Plan, Do, Check, Act cycle



Plan, Do, Check, Act should not be a once-and-for-all action, you may need to go around the cycle more than once, particularly when:

- Starting out.
- Developing a new process, product or service.
- Implementing any change.

Through our policy, we have committed to implementing our EMS based on ISO14001. However, due to copyright laws, it is not possible to provide a copy of this standard, to support this guidance.

Our Environmental Policy will be developed, reviewed and implemented by Thomas Safety Services Ltd under the authorisation of David Johnson (Managing Director).

Switchgear Support Ltd and its employees (including the Directors) and subcontractors must commit to adhering to the Environmental Policy, including the arrangements and implementation of safe environmental working practices.

The Environmental ‘statement of intent’ contained within this Environmental Policy will be signed and dated by David Johnson (Managing Director), who is the person with overall responsibility for Health, Safety and Environmental systems.

The Hierarchy of Waste Management

The waste hierarchy ranks waste management options according to what is best for the environment giving top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal. e.g. Landfill.

Hierarchy:

1. **Elimination** - Avoidance of producing the waste in the first place.
2. **Reduction** - Minimisation of the amount of waste produced.
3. **Reusing** - Reuse of items as many times as is reasonably practicable/realistically possible.
4. **Recycling** - After re-use, recycle whatever you can.
5. **Disposing** - After re-use and recycling, dispose of what is left (e.g. waste and residues) in a responsible way and in accordance with regulations and local authority requirements.

The Waste Hierarchy



Records

Copies of consents, permissions, environmental inspections and any environmental incident reports will be held in accordance with project document control procedure and site filing instructions.

Legislative Compliance

Switchgear Support Ltd are aware of current legislation, will source information from the Environmental Agency (EA) website (www.gov.uk/government/organisations/environment-agency), Natural Resources Wales website (<https://naturalresources.wales>), the Scottish Environment Protection Agency (SEPA) website (www.sepa.org.uk), the Northern Ireland Environment Agency (NIEA) for Northern Ireland website (www.nidirect.gov.uk/contacts/northern-ireland-environment-agency), the Environmental Protection Agency (EPA) for the Republic of Ireland website (www.epa.ie), speak with our local Environmental Health Officers (EHO’s) and consult with our retained consultancy Thomas Safety Services Ltd, when necessary.

Definitions

- Near Miss - Any event, which under slightly different circumstances, could cause damage or harm. e.g. To Flora or Fauna.
- Environmental Incident - Any event that causes damage to the environment.
- Polluting Matter - Any matter that is capable of causing or is likely to cause harm to the receiving water. e.g. Sewers, streams, rivers, etc.

AIM AND OBJECTIVES

AIM

Switchgear Support Ltd aim to develop a workforce culture that will recognise the importance of Safety, Health, Welfare, Environmental and Fire issues, which in turn will assist with the success of the business.

OBJECTIVES

- To ensure that all employees (including David Johnson and Helen Johnson) and subcontractors exercise their responsibilities in a manner that reflects our aim.
- To ensure that only the highest standards are achieved and adhered to in all our undertakings.
- To operate facilities in a manner that minimises risk to employees, subcontractors, client employees, the environment, the local community and anyone else affected by our work activities.
- To continually improve our performance in Safety, Health, Welfare, Environmental and Fire issues through the participation, commitment and support of all our employees and subcontractors.
- To assess and reduce energy usage over the next 12 months by:
 - Recording and monitoring usage of fuels and energy sources.
 - Investigating discrepancies and taking prompt action to rectify problems.
- To assess water consumption over the next 12 months by:
 - Monitoring and comparing usage.
 - Investigating discrepancies and taking prompt action to rectify problems.
- To measure the percentage of waste recycled over the next 12 months and set targets for improvement.
- To review our environmental management system annually and:
 - Monitor progress.
 - Ensure staff training is continual.
 - Hold regular team meetings.
 - Update all environmental documents and systems, as and when required.
 - Write an annual update.

ENVIRONMENTAL STATEMENT OF INTENT

At Switchgear Support Ltd, we acknowledge that we have a responsibility to care for and protect the environment, covering all aspects of our work-related activities. Pollution prevention and waste reduction is an integral part of our business plan and we are committed to continually improving our own environmental performance across all our business activities. We encourage our employees, subcontractors, clients, business associates and members of the wider community to join us in this effort.

Switchgear Support Ltd recognise our key environmental impacts to be in the areas of:

- Energy use.
- Raw material use.
- Waste generation.
- Water use.
- Transport.
- Emissions to air and water.

It is the policy of Switchgear Support Ltd under the direction of David Johnson (Managing Director), as far as is reasonably practicable to:


- Adopt the highest standards in all areas of our operation.
- Ensure that we meet all relevant legislative requirements.
- Assess our activities, with the aim of identifying areas where we can minimise our impacts.
- Ensure that we minimise any waste produced by careful and efficient use of all materials and energy.
- Purchase sustainable products wherever feasible. e.g. Recycled products and energy from renewable sources.
- Train all employees in environmental ‘best practice’ techniques and encourage their involvement and co-operation.
- Ensure that risks from environmental, health & safety issues to our employees, subcontractors, client employees, visitors and members of the public, who may be affected by our work activities, are reduced to as low as is reasonably practicable.
- Adopt an environmentally sound transport strategy.
- Include environmental and ethical considerations in business decisions.
- Recycle as much waste products as possible.
- Continually assess the environmental impact of all our business activities.
- Arrange for adequate resources and financial provision to meet the requirements of the policy.
- Monitor the effectiveness of the company environmental policy and bring any changes that are made to the attention of all employees, subcontractors, client employees, visitors, including members of the public if applicable.

If the aims of this policy are to be achieved it requires the support, cooperation and compliance of all employees, subcontractors, clients and visitors. To this end we will operate an ‘open door policy’.

It is in the interests of all employees, subcontractors, client employees and visitors to seek continuous improvement in environmental management while at work. High standards in environmental management will benefit all persons employed or visiting the premises. The most important resource within Switchgear Support Ltd are the employees, who must cooperate and work together to reduce environmental impacts. With good cooperation, we can improve performance and reduce costs (human, financial, social and environmental).

Switchgear Support Ltd commits to an annual review (or sooner, if circumstances/regulations dictate) of our performance and our management system to ensure that we meet the relevant regulations and standards.

David Johnson (Managing Director) of Switchgear Support Ltd has overall responsibility to ensure that the Environmental policy and our management system is implemented, effective and adhered to.

Printed Name	David Johnson	Position/Job Title	Managing Director		
Signature		Issue Date	25/10/2023	Date Review Due	25/10/2024

RESPONSIBILITIES

Managing Director (David Johnson)

- Responsible for overall delivery of the environmental commitments.
- Approves this Environmental Policy and signs the 'statement of intent'.
- Responsible for the development and associated works in compliance with environmental commitments.
- Responsible for liaison with environmental regulators such as the Environment Agency (EA) and Local Authority (LA) Environmental Health Officers (EHO's) and other interested parties as and when required.
- Liaises with Thomas Safety Services Ltd as and when required.
- Responsible for reporting any environmental issues arising on site to the relevant authority. e.g. Environmental Agency, Natural Resources Wales, etc.
- Ensures measures to minimise potential pollution are assessed and planned.
- Ensures pollution prevention measures are implemented and maintained.
- Ensures employees and subcontractors are informed of the requirements through meetings, briefings, toolbox talks and workplace inspections.
- Ensures employees and subcontractors are made aware of the environmental emergency preparedness measures for the relevant project.
- Ensures workplace activities are monitored and ensures control measures are in place, including emergency equipment.
- Carries out/ensures regular workplace inspections are conducted.
- Ensures there is sufficient emergency equipment available in the workplace. e.g. Spill kits.
- Arranges/carries out environmental emergency preparedness training, including spill response, when necessary.
- Responsible to ensure that best practice is implemented to protect the environment during workplace activities.
- Always sets a personal example.

Employees and Subcontractors

- It is the responsibility of all employees and subcontractors, to ensure that best practice is implemented to protect the environment during workplace activities.
- Reports any environmental issues arising in the workplace to David Johnson (Managing Director).
- Always sets a personal example.
- Employees should read this Environmental Policy and sign the declaration section (Appendix 1).
- Subcontractors should read this Environmental Policy and sign the declaration section (Appendix 2), if requested to do so.

Thomas Safety Services Ltd

- Liaises with and advises David Johnson (Managing Director), as necessary.
- Liaises with the EA, EHO's and other interested parties, as and when required.
- Ensure that Legislation, Approved Code of Practice's (ACoP's), other industry standards, 'best practice' guidance notes and safe working practices relevant to the company are monitored.
- Carries out environmental emergency preparedness training, including spill response, when necessary.
- Always sets a personal example.

ENVIRONMENTAL INCIDENT REPORTING

Where necessary/relevant, David Johnson (Managing Director) will ensure any environmental incidents are reported to:

- The Environmental Agency (EA) for England
 - Incident hotline 0800 80 70 60
 - www.gov.uk/report-an-environmental-incident
- Natural Resources for Wales
 - Incident hotline 0300 065 3000

- <https://naturalresources.wales/about-us/contact-us/report-an-environmental-incident>
- The Scottish Environment Protection Agency (SEPA) for Scotland
 - Incident hotline 0800 80 70 60
 - www.mygov.scot/report-environmental-incident
- The Northern Ireland Environment Agency (NIEA) for Northern Ireland
 - Incident hotline 0800 80 70 60
 - www.nidirect.gov.uk/contacts/northern-ireland-environment-agency
- The Environmental Protection Agency (EPA) (Republic of Ireland)
 - Incident hotline +353 1890 33 55 99
 - www.epa.ie/who-we-are/contact-us

Where necessary/relevant, David Johnson (Managing Director) will also ensure any environmental incidents are reported to:

- The relevant English water authority
 - <https://discoverwater.co.uk/water-sector>
- Dŵr Cymru Welsh Water
 - Water emergencies - 0800 085 3968 (24 Hour service)
 - Sewer emergencies - 0800 085 3968 (24 Hour service)
 - <https://contact.dwrcymru.com>
- Scottish Water
 - Helpline - 0800 0778 778 (24 Hour service)
 - www.scottishwater.co.uk/Help-and-Resources/Contact-Us/Contacting-Us
 - Sewage www.scottishwater.co.uk/Your-Home/Your-Waste-Water/Sewage-Pollution/Sewage-Pollution-Form
- Northern Ireland Water
 - Waterline - 0345 744 0088
 - Leakline number - 0800 028 2011
 - www.niwater.com/emergencies.aspx
- Irish Water (Republic of Ireland)
 - +353 1707 2828
 - www.water.ie/contact

COMMUNICATION AND TRAINING

Public Awareness

Switchgear Support Ltd's Environmental Policy is available to the public and a copy can be provided on request.

Employee and Subcontractor Awareness

Employees who have access to shared folders can view our Environmental Policy online. Employees and subcontractors without such access can view a paper copy in the office.

New employees and subcontractors will receive environmental awareness training as part of the induction programme.

Major changes to our Environmental Policy will be communicated via briefings.

Minor changes will be communicated to managers who will train/update all relevant employees and subcontractors.

Where necessary bulletins will be displayed on notice boards.

The progress made regarding objectives and targets will be reported to employees and subcontractors on an ongoing basis.

Employees and subcontractors will be encouraged to make suggestions for improvements to the Environmental Policy and management system. There will be a formal opportunity for this at meetings.

Emergency procedures will be displayed and all employees and subcontractors will receive a briefing on emergency procedures during induction and via toolbox talks.

Training on the implementation of this document will be provided to employees and subcontractors. Additional coaching and guidance will be provided by the relevant manager or Thomas Safety Services Ltd with support from the management team.

HEALTH, SAFETY AND ENVIRONMENTAL CARE

The highest standard of Health, Safety and Environmental care forms an integral part of the company's line management responsibilities and control of the workplace. Precautions will be implemented to take account of the following issues:

- **Dust** - Suppression methods will be utilised to control this aspect wherever possible.
- **Noise** - Equipment will be used which controls noise, especially plant with acoustic enclosures, etc.
- **Odours** - Materials liable to produce odours will be controlled and contained wherever possible.
- **Contamination** - It is not envisaged that the company will be responsible for contamination. Where issues do arise, it will be controlled through its Management Systems.
- **Smoke** - The effects from smoke will be reduced to a minimum, the company policy is to recycle materials not to burn waste.

Employees and subcontractors will receive appropriate training to ensure they understand the company's approach and philosophy towards environmental management. Clearly defined lines of communication and supervision are outlined within the company's policies. Switchgear Support Ltd seeks the support, co-operation and compliance of all employees, subcontractors, clients and visitors. To this end we will operate an 'open door policy'.

PLANT AND EQUIPMENT

Plant and systems of work are designed and maintained to the highest possible standard. Equipment will be used that maintains a high level of performance, which complies with current statutory requirements. e.g. Noise and dust/fume emissions.

Switchgear Support Ltd uses vehicles that are modern and emit less emissions into the atmosphere and have a proven maintenance regime that will ensure maintenance is carried out in line with the manufacturers guidelines.

When Switchgear Support Ltd hires equipment, we request copies of the latest maintenance record from the hire company.

RELEASE OF CONTAMINANTS / SPILLAGES

Switchgear Support Ltd undertakes our duties with all due diligence in reducing the risk of environmental hazards to our employees, subcontractors and others who may be affected by our actions.

Our incident response covers:

- Spillage of hazardous substances. e.g. Chemicals.
- Discharge of pollutants to watercourse or land.
- Fire. e.g. Emission to air.
- Discovery of potentially contaminated land.

Switchgear Support Ltd manages such risks by adopting the following procedures:

- Identify any areas of risk.

- Remove the risk where possible.
- Reduce the quantity of items of risk.
- Control the work activities by well-managed system of work.
- Try to identify the source of the pollution and stop the flow immediately.
 - Switch of/isolate all sources of ignition.
 - Identify material which may be burning, and if it can be done safely, extinguish with appropriate fire extinguishing media.
- Avoidance of spillage.
 - If necessary, check the site drainage plan, to establish where the spillage will go.
 - If possible, stop the flow by damming the flow with earth, sand, polythene, or an absorbent material.
 - If applicable, divert the flow from drains and/or watercourse.
 - If available, use drain covers.
 - **Note:** DO NOT wash the spillage into the drainage, because it only makes it worse!
- Where necessary, spill kits will be made available. e.g. On vehicles, at site cabins.
 - If appropriate, use absorbent material to mop up and dispose of as required (* See below).
 - If applicable and available, place boom across watercourse, if applicable.
 - DO NOT use detergents unless the Material Safety Data Sheet (MSDS) says that it is 'safe to do so'.
 - If the spillage has already entered the drainage:
 - If possible, block the drainage off.
 - Contact the Environmental Agency and/or Water Authority immediately.
 - If appropriate, seek specialist advice before moving any contaminated material.

* Waste disposal will be in line with our Control of Substances Hazardous to Health (COSHH) Procedures and manufacturers Material Safety Data Sheet (MSDS) information.

An investigation will be carried out by Switchgear Support Ltd to ascertain why the incident occurred in order to prevent further occurrences.

DUTY OF CARE / RECYCLING

Switchgear Support Ltd ensures proper consideration is given to our environmental and waste management responsibilities by:

- Assessing and regularly re-assessing the environmental effects of our activities.
- Conducting training/refresher training for employees in environmental issues.
- Ordering the exact amount of materials needed for the job to avoid waste and where possible reuse materials, where reasonably practical.
- Minimising the production of waste.
- Minimising energy wastage.
- Minimising the use of environmentally damaging chemicals.
- Promoting the recycling of any waste produced.
- Promoting the use of renewable materials.
- Reducing and/or limiting the production of pollutants of water, land and air.
- Controlling noise emissions from our operations.
- Communicating and promoting environmental conformance.

Waste material produced by Switchgear Support Ltd varies, but individual waste streams that we have identified include:

- Wood recycling.
- Metal recycling.
- Waste Electrical and Electronic Equipment (WEEE) recycling.
- Cardboard and paper recycling.
- Used printer cartridge recycling.

A high standard of waste disposal is maintained by us. Any wastes that cannot be recycled or re-used are disposed of in accordance with the appropriate statutory regulations. Wherever practical recycling of waste products will be considered, balancing the advantages of recycling with the hazards of storage within its premises and project work.

The removal of any waste from our premises or sites will be undertaken by licensed waste disposal companies who have been vetted and checked for compliance. Waste material transfer notes are available for all circumstances that arise either within the works or through the material controllers.

Switchgear Support Ltd are committed to developing our recycling and environmental policies in order to further reduce the production of waste through good working practice, economic recycling or reuse.

Switchgear Support Ltd's recycling policy has the following specific aims:

- ✓ Cultivate a work ethic, which promotes waste minimisation and recycling.
- ✓ Promote economy in the use of paper and other consumables.
- ✓ Encourage the purchase of recycled materials and those which are suitable for disposal by recycling.
- ✓ Favour suppliers with sound environmental principles and positive recycling and waste management practices.
- ✓ Minimise waste by encouraging the exchange and reuse of equipment and materials.
- ✓ Help our clients to avoid sending waste to landfill sites whenever practical.
- ✓ Promote waste separation at the point of creation on our projects.
- ✓ Whenever possible, we collect individual waste streams and take them directly to recycling facilities.
- ✓ We also encourage our employees and subcontractors to dispose of waste correctly.
- ✓ Develop a waste management strategy, which accommodates recycling procedures and initiatives.
- ✓ Continue to develop and improve the range and scope of recycling schemes we offer.

MATERIAL STORAGE

All materials will be stored in suitable locations and where necessary identified as an area requiring special attention. This will be done in line with the guidelines supplied by manufacturers or as outlined by the MSDS's, which are available at our premises or sites.

There is a duty under the Control of Substances Hazardous to Health Regulations (COSHH) to identify any substances that could cause harm to employees, subcontractors or others who may be affected. Where applicable Switchgear Support Ltd will undertake detailed Risk Assessments and COSHH assessments and produce procedures for the safe handling and control of such materials.

TRANSPORT

Plant and transport used by Switchgear Support Ltd will conform to the statutory requirements applicable, which will include the Road Traffic Regulations. Where it is not clear what requirements are applicable clarification will be sought.

At all times, safe transportation routes will be established with haulage companies to minimise any impact on local communities.

Site transport will conform to the highest standards available and local site rules to take account of speed limits, noise levels, fume emission, maintenance procedures and operational procedures.

CARBON FOOTPRINT

Switchgear Support Ltd policy is to reduce our environmental impact, wherever and whenever practicable. Carbon reduction measures form an integral part of our overall strategy, helping to improve both operational performance and a reduction in potentially harmful emissions to land, water and air.

Switchgear Support Ltd's aim is for a 0% carbon balance to be achieved, where practical. To help achieve this we will:

- Comply with all current energy legislation, seeking to meet or better legislative targets.
- Minimise waste, promote recycling, and the use of recycled products to help reduce the burden on landfill, and therefore methane generation.
- Continue to promote and design energy efficient, and therefore carbon reducing systems and equipment, on behalf of clients.
- Promote environmental awareness and responsibility amongst employees, subcontractors and others.
- Seek, where practicable, continuous improvement in our environmental performance.
- Actively promote video/telephone conferencing as a means of reducing travelling.
- Evaluate the potential benefits of home-working.
- Evaluate the potential benefits of carbon off-setting. e.g. Tree planting.

Actions developed to date include:

- Integration of environmental issues into all aspects of the decision-making processes.
- Sustainable sourcing and purchasing policy.
- Energy efficient, and therefore carbon reducing equipment.
- Promotion of the Department For Transport's [Smarter Driving Tips](#) initiative.
- Vehicle sharing / alternative transport policy.
- The assessment and procurement of fuel efficient vehicles, supported by scheduled deliveries.

This Carbon Footprint statement underpins the existing Environmental, Procurement & Waste Management Policy. This policy clearly identifies the responsibilities and procedures for achieving our stated objectives in all aspects of its activities leading to improved environmental performance, including reductions in both Carbon Dioxide (CO₂), and Methane (CH₄) emissions.

CLIMATE CHANGE

Climate change has now been recognised as an international issue with national governments on both sides of the Atlantic committed to taking action to reduce greenhouse emissions. Switchgear Support Ltd recognises that we emit greenhouse gases from operating our vehicles, etc. At the same time, we have a role in supporting governments and communities to reduce the impacts of climate change from road transport by helping to reduce traffic congestion and air pollution.

Switchgear Support Ltd are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions from all vehicles and property in our ownership.
- To actively promote improved energy efficiency and fuel efficiency within our business.
- To support research into transport policy and the use of alternative fuels.
- To stay abreast of alternative fuel developments and continue to assess their commercial viability.

BIODIVERSITY

Switchgear Support Ltd's approach in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

Switchgear Support Ltd strive to enhance biodiversity where practicable. Accordingly, our commitments are:

- Where we operate from sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- Where we are involved in the development of new sites, we will comply with all relevant statutory requirements and guidelines in respect of designated areas on any of our development sites. Where significant areas of landscaping are proposed, we will aim to promote biodiversity through, for example, sensitivity of planting taking account of any local biodiversity networks or action plans.
- Where we operate from existing sites the potential to promote biodiversity is likely to be limited. The nature of the operations conducted at our sites is such that they are covered. e.g. Buildings, hard standings. We will however seek to identify any sites where the potential exists for enhancing biodiversity and over time develop appropriate actions plans to achieve this.
- Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained. We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.

WILDLIFE

In the event of wildlife being discovered during the works that have not already been identified, works will cease when safe to do so and David Johnson (Managing Director) will be notified.

The wildlife will be assessed and either the works will cease until mitigation measures are implemented such as translocation, or a watching brief will be carried out during the works to monitor any potential disturbance.

Where these options are not possible work may have to be programmed for a time which is less likely to cause any potential disturbance to wildlife. e.g. Outside of breeding seasons.

David Johnson (Managing Director) will ensure any potential disturbance or where it is likely to occur are reported to:

- The EA for England and Scotland www.gov.uk/report-an-environmental-incident
- Natural Resources for Wales <https://naturalresources.wales/about-us/contact-us>
- The Northern Ireland Environment Agency (NIEA) for Northern Ireland www.daera-ni.gov.uk/northern-ireland-environment-agency
- The National Parks & Wildlife Service for the Republic of Ireland (Southern Ireland) www.npws.ie/national-parks

MONITORING, AUDITING AND REVIEWING

Switchgear Support Ltd's OH&S policy identifies the Monitoring, Auditing and Reviewing procedures applicable to our operational activities, these include the important issues associated with the environment. This forms the basis of the initial procedure to identify areas of concern or compliance. Where issues arise that are associated with the environment, specific monitoring, auditing and/or reviewing will take place by the persons identified/appointed.

Environmental control is everyone's responsibility, therefore all employees and subcontractors are charged with monitoring compliance, whether it is monitoring individual workplaces or the deposits within the skips, to ensure the correct segregation of materials. This is an ongoing issue within our training programme which covers management, first line supervision and employees where toolbox talks effectively raise the environmental profile.

APPENDIX 3 - LEGAL ASPECTS

The table below is a representative guide only and provides a brief explanation.

Legislation / Regulation	Explanation	Monitoring Responsibility
Environmental Protection Act 1990 - Part 11, Section 34 (as amended) relating to Duty of Care for Waste	Section 34 requires businesses to manage waste from cradle to grave. The following requirements have to be met: <ul style="list-style-type: none"> Waste must not be allowed to escape. Prevent others causing an offence or breaching a permit. Waste must only be transferred to an authorised person. Waste transfers must be recorded. 	Managing Director and TSS Ltd
The Hazardous Waste (England and Wales) Regulations 2005 (As Amended)	Require businesses to manage hazardous waste. The following requirements have to be met: <ul style="list-style-type: none"> Each premises producing more than 500kgs must be notified. Consignment notes must be completed and retained for 3 years (including the use of the correct EWC/ LOW code). Hazardous waste must not be mixed with non-hazardous waste or other hazardous waste; where it is mixed it must be separated. Additional paperwork must be retained, including consignee returns. 	Managing Director and TSS Ltd
The Waste (England and Wales) (Amendment) Regulations 2012	Stipulates the information that must be recorded on a waste transfer note (WTN) as well as requiring WTNs to be retained for a minimum of 2 years. The regulations also: <ul style="list-style-type: none"> Requires businesses to confirm that they have applied the waste management hierarchy when transferring waste by including a declaration on the waste transfer note. Requires additional information to be documented on waste transfer notes, including a Standard Industrial Classification of Economic Activities (SIC) code. For information, please see http://resources.companieshouse.gov.uk/sic For a Condensed SIC List , click here . Excludes some categories of waste from waste controls and introduces powers to apply Compliance, Stop and Restoration Notices.	Managing Director and TSS Ltd
The Pollution Prevention and Control (Scotland) Regulations 2012 (PPC 2012)	The PPC regulations apply an integrated environmental approach to the regulation of certain industrial activities. This means that emissions to air, water (including discharges to sewer) and land, plus a range of other environmental effects, must be considered together.	Managing Director and TSS Ltd
The Water Environment (Controlled Activities) (Scotland) Regulations 2011	The regulations cover rivers, lochs, transitional waters (estuaries), coastal waters groundwater, and groundwater dependant wetlands. The water environment includes; groundwater, wetlands (directly associated with surface and groundwater bodies); rivers; lochs; transitional waters (estuaries and saline lagoons); and coastal waters (3nm from territorial baseline).	Managing Director and TSS Ltd