



ENVIRONMENTAL POLICY



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“The Belfry Group recognises the need to take all possible steps towards improving and maintaining the environment through the rigorous implementation of a clear and effective environmental policy.”



ENVIRONMENTAL POLICY

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SECTION 1

POLICY STATEMENT

1. Belfry Group Ltd will take steps wherever possible to protect and improve the environment consistent with the running of an efficient business.
2. Belfry Group Ltd intends to comply with the letter and the spirit of the United Kingdom environmental law, and any European Union directives adopted by the UK.
3. Belfry Group Ltd shall take action where possible to enhance the natural environment in line with Government environmental strategy and the principal of environmental sustainability.
4. Belfry Group Ltd have a particular responsibility to ensure that we:
 - ◆ Increase the efficiency with which we use energy
 - ◆ Reduce the amount of waste produced by where possible recycling
 - ◆ Control of emission of noxious or harmful fumes into the atmosphere
 - ◆ Nurture in our employees a continual awareness and regard for environmental matters
5. All employees working within Belfry Group Ltd have a legal obligation to comply with this policy, and those of our Clients, by ensuring the manner in which they conduct their daily employment does not have any detrimental effect on our environment.
6. It is responsibility of all Managers and Supervisors, within the Environmental Management structure to ensure that this policy is carried out within the areas of their responsibility.
7. This policy will be kept under review and amended as and when necessary or when any changes to the relevant legislation are implemented.

Date: 21 July 2010



Keith Rimmer
Managing Director

SECTION 2

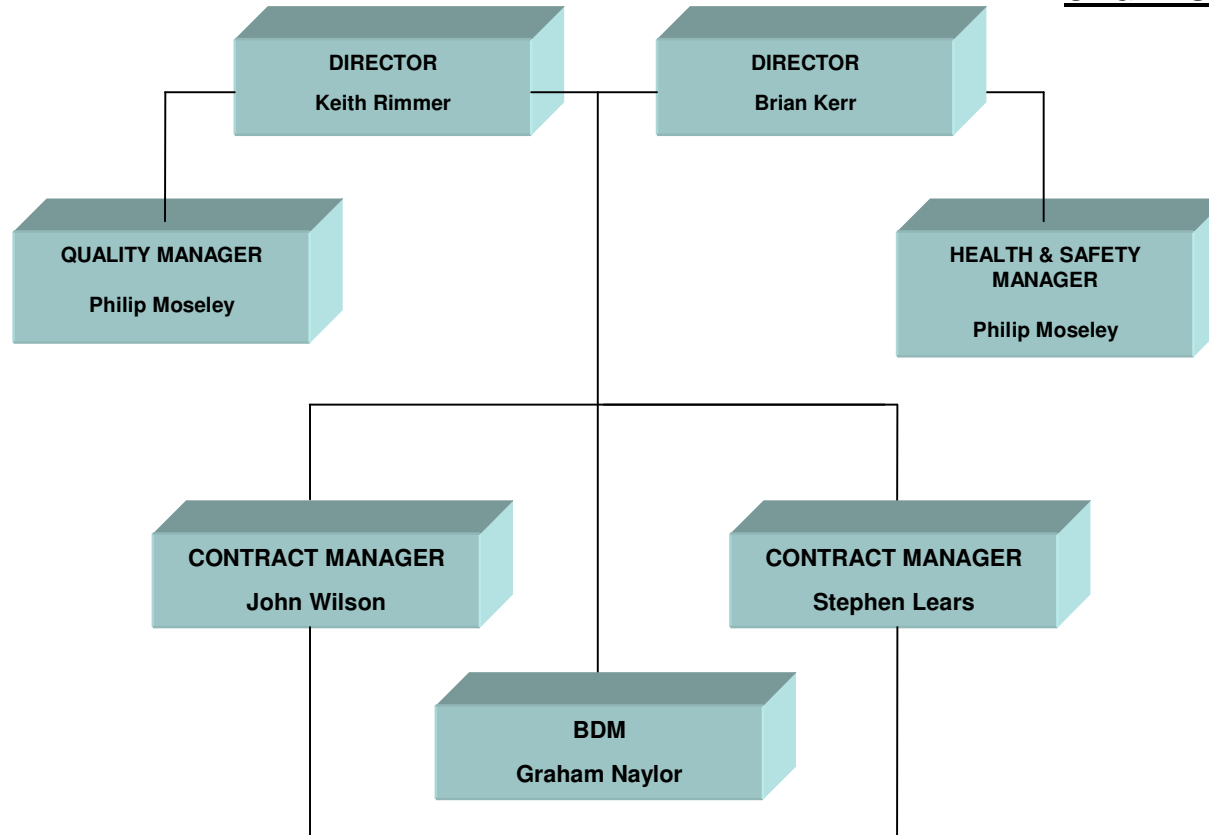
THE ORGANISATION

1. The main current legislation which deals with the environment is The Environmental Protection Act 1990. This policy applies to the properties that Belfry Group Ltd occupies. It does not apply to our client's sites. To enable Belfry Group Ltd to comply with this legislation the organisation of individuals within Belfry Group Ltd will be as detailed in the following paragraphs.
2. The Managing Director, Mr. Keith Rimmer, will have overall responsibility for all aspects of Environmental Policy and management within Belfry Group Ltd. His deputy, in his absence, will be the Health & Safety Manager, Mr Philip Moseley.
3. All Head Office Directors and Managers are to ensure that the employees in their departments comply with this policy. They are to appoint a deputy to be responsible for environmental matters in their absence.
4. All employees have a responsibility to ensure they comply with the policy and with any environmental measures issued by Belfry Group Ltd as part to a commitment to maintaining our environment.

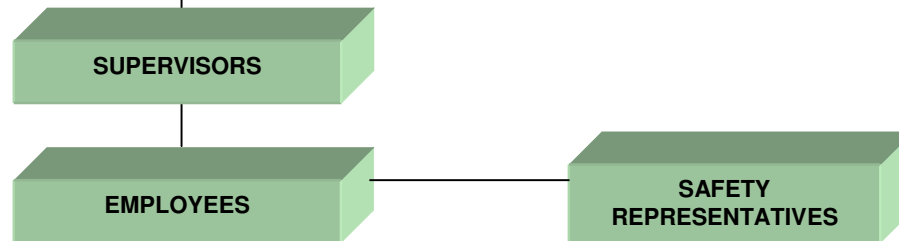
SECTION 2

ORGANISATION CHART

Office



On Site



ARRANGEMENTS

1. The main objective of the Environmental policy is to protect the Environment wherever possible.
2. It is important that we are able to measure the success of any programme. To enable us to do this performance indicators have been established for each of the following areas:
 - ◆ Waste Management
 - ◆ Transport Management
 - ◆ Energy Conservation
 - ◆ Recycling
 - ◆ Promotion Of The Use Of Re-Usable Products
 - ◆ Promotion Of The Use Of Re-Usable Containers
 - ◆ CFC's
 - ◆ Maintenance
3. Base-line figures have been calculated for Head Office. Where these figures are available, to enable us to establish our current status and, where necessary to permit realistic targets to be set.
4. A system of bi-annual audits will be initiated to monitor progress of Belfry Group Ltd in striving to achieve our Environmental goals. The Environmental Adviser will be responsible for co-ordinating these audits throughout Belfry Group Ltd.

SECTION THREE

WASTE MANAGEMENT

1. Belfry Group Ltd being a manufacturing company, has a massive potential for the production would. By far our largest waste material is paper and this section will address the measures to be implemented to reduce and dispose of the amount of paper waste we produce.
2. Each year the UK spends over £4,000 million consuming 9 million tonnes of paper and board. More than half of this is imported. It would require a forest the size of Cornwall to be cut down each year to produce this amount of paper and board. Although most of the forests that are cut down are subsequently replanted even a temporary denudation of the forest results in a reduction in the absorption of carbon dioxide and hence contributes towards the greenhouse effect.
3. Recycling paper can have the following benefits on the environment
 - Reduces the energy required to produce paper by up to 50%
 - Reduces the need to reduce natural habitats to make way for forest planting.
 - Reduces the use of bleaches.
4. A study undertaken at Head Office showed that over a period of four months, 50 lbs of paper of many different types was sent to be recycled.

This would equal 150 lbs per year.
5. These figures do not include the amount of paper used by Belfry Group Ltd, and sent out in letters, information packs, tenders and such items.
6. There are companies who will collect and pay for paper to be recycled. The Office Manager is to make contact with a local company to arrange for the recycling of their waste paper. All offices within Belfry Group Ltd are to be encouraged to put waste paper into the recycling bins and not into normal rubbish bins.
7. There are several initiatives that can be taken to reduce the amount of waste paper that we as a company produce and where at all possible these are to be put into immediate effect, they include:
 - Writing only when a telephone call will not suffice

- Greater use of the "E" mail system
 - Circulating documents rather than copying them to each individual
 - Photocopying and typing documents and letters on both sides of paper where at all possible (i.e. Internal documents)
 - Reducing distribution lists to a minimum
8. Following these rules has a considerable potential for reducing consumption of paper.

TRANSPORT MANAGEMENT

One form of atmospheric pollution, that from smoke, has been greatly reduced by legislative means over the last forty years. A bigger threat to air quality now comes from emissions from vehicles.

Cars, Lorries and other vehicles are a significant and growing source of air pollution. The government has introduced stricter controls for emission standards for new vehicle and checks of existing standards as part of the MOT test.

1. With a few exceptions all Belfry Group Ltd vehicles run on LPG. Any new vehicles purchased by Belfry Group Ltd will comply with this to enable us to contribute to a reduction of lead emissions into the atmosphere.

These emissions are taken into the body by inhalation or digestion and thence into the blood stream. Some of the lead is excreted but some remains in the body tissue and bone structure. Large quantities of this in the body can lead to a breakdown of the central nervous system, blood forming organs, the kidneys and the gums, the skin and the extensor muscles of the wrist or foot. A recent study over the last fifteen years shows that even low exposure to lead emissions can cause reduced intelligence and affect behaviour in children.

2. The company's service vehicles have been fitted with the 'Tracker System' for a number of years. This enables us to continually monitor the location of all our vehicles and thereby eliminate un-necessary or lengthy journeys and automatically keep resultant Co2 emissions to a minimum.
3. There are several simple precautions that we can all take when driving vehicles, be they company cars, vans or our own personal means of transport. Most of these are common sense but do bear repetition:
 - Is the journey really necessary. Are there alternatives
 - Can Public transport be used instead of the car or van
 - Planning a combination of journeys and personnel
 - Careful route planning
 - Economical driving style (i.e. 56 mph, switching off if stationary for any length of time)
4. To assist help reduce fuel consumption, regular servicing of vehicles is to be carried out in accordance with the manufacturers recommendations.

ENERGY CONSERVATION

In a recent white paper the government stated that “Global warming is one of the biggest environmental challenges that is facing the world today”. The most significant contribution that any company can make towards this is to reduce the need to burn “fossil fuels” by reducing the consumption of the energy we use.

Burning “fossil fuels”, which are looked upon as unrenewable sources of energy as they take so long to be reproduced, creates carbon dioxide which adds to the “green house” effect.

1. Belfry Group Ltd is committed to an improved efficiency in the amount of energy that we use.
2. Not only does a reduction in the energy we use help preserve the environment, it can also have the benefit of a financial saving for Belfry Group Ltd.
3. Therefore it is Belfry Group Ltd policy that the consumption of energy is to be managed in an efficient manner in order to reduce running costs and enable resources to be free for other concerns.

Responsibility

1. All Managers are to regard the proper control of energy consumption to be part of their overall management responsibilities.
2. Head Office is to nominate an employee as the Energy Manager. The Energy Manager is to have direct access to all departmental managers.
3. All employees within Belfry Group Ltd have a role to play in helping to conserve our energy consumption by assisting in the reduction of energy wastage wherever possible.

Methods of Saving Energy

1. Each of us can assist in the conservation of energy by putting into effect some, if not all of the following recommendations:
 - In the office environment the main consumer of electricity is lighting. The common belief that it is wasteful to switch off fluorescent tubes (strip lamps) for a short period of time is a myth. If the room is empty for five minutes and the conventional strip light switched off there is an energy saving. All employees are to ensure that if a room is empty in excess of five minutes, or there is no real need for lights to be on, then they are to switch off all unnecessary lights.

ENVIRONMENTAL POLICY

- If office equipment such as computers are not in use then energy can be saved by switching them off. The prime example of this is when employees go out to lunch or to a meeting and fail to switch off their machines. All employees are encouraged to switch machines off when not in use.
 - The recognised comfort zone for temperature in the workplace is between 16 and 24 degrees Fahrenheit. By keeping doors and windows closed when heating is being used during the colder periods we can stop heat escaping thereby reducing the amount of energy used. Area office Energy Managers are to assess their working environment and eliminate any drafts which may be detected.
2. Our overall policy is to identify areas for improved energy efficiency on all contracts by ensuring:-
 - a) That all plant is operated and maintained to optimum standards.
 - b) By keeping abreast of developments within energy conservation technology.
 3. The Energy Manager is to be ever vigilant to ways of conserving energy within their working environment.
 4. We can all, even in the office environment, assist in saving our energy resources and, following these simple guidelines, an energy saving reflected in a fuel consumption costs achieve an initial reduction of 7.5%. All managers are to strive to meet this target.

Re-cycling

To ensure that wherever possible purchased consumable materials are manufactured from re-cycled products.

To ensure that wherever possible consumable items are submitted for re-cycling following use.

Examples:

- a. Computer Paper.
- b. General Waste.
- c. Refrigerant Gases.
- d. Lubricating Oils.
- e. Air Filters.
- f. Glassware such as lamps.
- g. Metal

Promotion of the use of Reusable Products

Wherever possible the "consumable" items should be replaced with re-usable products.

Examples:

- a) Use of washable filters rather than disposable type.
- b) Prohibit the use of disposable refrigerant canisters.
- c) Use of re-chargeable batteries.
- d) Prohibit the use of disposable test kits.

Promotion of the use of Reusable Containers

Wherever possible containers used for the transport of items should be replaced with reusable products.

Example:

- a) Use of returnable water treatment chemical containers and drums.

CFC's

To take all necessary action to ensure compliance with recognized legislation and codes of practice governing the use of CFC's, and working towards the eventual phasing out of all CFC's.

- a) Prohibiting the discharge of any CFC gas to atmosphere.
- b) Ensuring that all operatives involved with the sale or maintenance/repair of CFC plant are trained on the safe handling of CFC's.
- c) Ensuring that contaminated CFC's are reclaimed and submitted to a recognized supplier for re-cycling or safe disposal.
- d) Ensuring that wherever possible contaminated CFC's are re-cycled for re-use.
- e) Promoting the sale of refrigeration machinery which does not involve the use of CFC's in any manner.
- f) Ensuring that all usage of CFC products are adequately documented to highlight any problem areas and to ensure that safe disposal/re-cycling procedures are being adhered to.

Maintenance

To take all necessary steps to promote the implementation of recognized maintenance routines aimed at the safe and efficient operation of all plant thereby prolonging plant life, reducing energy costs, preventing harmful emissions, preventing accidents and complying with legislation and codes of practice concerning levels of monitoring and testing.

Examples:

- a) Regular leak testing of all refrigeration plant to identify to leakage of CFC's.
- b) Regular combustion and flue analysis on boiler plant to identify any harmful emissions and to ensure optimum efficiency.
- c) Regular monitoring of levels of air/water quality.
- d) Regular maintenance and monitoring of performance of all plant/machinery.