



## ENVIRONMENTAL POLICY

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## ENVIRONMENTAL POLICY

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**“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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## 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:
  - ◆ Will comply with all relevant environmental legislation and industry codes of practice.
  - ◆ Take account of concerns of interested parties such as regulators, shareholders, employees and the public.
  - ◆ Set objectives and targets to drive continual improvement programmes and regularly review environmental performance to ensure success.
  - ◆ Encourage our supply chain to consider their environmental impacts.
  - ◆ Ensure that all employees are aware of this policy and trained in their environmental responsibilities.
  - ◆ Make this policy available to our customers and the public on demand.
  - ◆ 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.

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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: 12 December 2011



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Keith Rimmer  
Managing Director



## ENVIRONMENTAL POLICY

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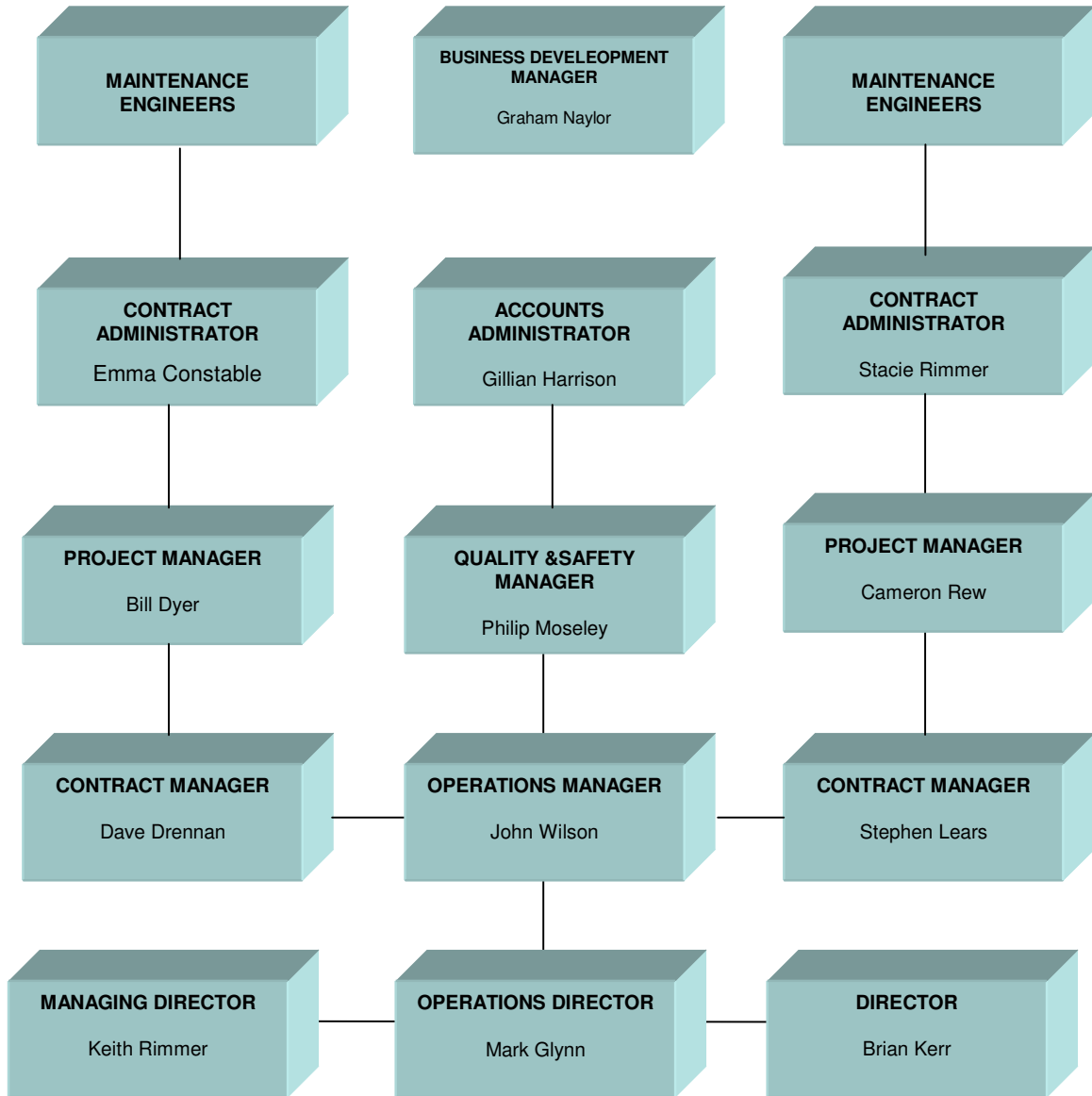
### SECTION 2

### 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 Quality & 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**



### **SECTION 3**

### **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.

## WASTE MANAGEMENT

### Waste Minimisation and Waste Hierarchy

To make savings in your waste costs and reduce the impact on the environment, following the waste hierarchy helps to identify different options by ranking them in order of environmental impact. Start at the top of the hierarchy to eliminate all waste where possible.

#### The waste hierarchy



#### 1 Eliminate

Eliminating waste entirely may not always be possible, but by not creating it in the first place reduces costs of raw materials.

#### 2 Reduce

Reducing the amount of waste you produce can be achieved in a number of ways, including the amount of packing used, reduce off-cuts and rejects, send information electronically, purchase material in bulk and use returnable containers.

#### 3 Re-use

To limit extra spend of buying items in, many can be re-used to reduce waste.

For example:

- Packaging - boxes can be re-used many times.
- Printer toner cartridges - choose a supplier that has a returns policy so that they can be re-filled and used again.

- Paper - re-use paper from misprints and drafts as scrap paper in the office.
- Drums - many raw materials are delivered in drums that can be washed and returned to the supplier, or re-used on site as waste containers.
- Furniture and textiles - waste furniture and textiles may be of use to charities or to waste exchange groups.

#### **4 Recycle**

Recycling is an increasing requirement through legislation in order to reduce the impact on the environment. Many items can now be recycled, speak to your local recycling centre or waste management contractor to find out what they are and how they should be segregated.

#### **5 Disposal**

Disposal is the last resort when the other hierarchy options have been exhausted. There are legal obligations that all producers and handlers of waste need to comply with, so it is important that you contact your waste management contractor to discuss options like recycling to make waste disposal more efficient and save money.

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. Belfry Group has an Office Recycling Centre which is situated behind the Helpdesk. The Recycling Centre consists of a Blue Bin which is for paper type products and a Red Bin which is used for plastic and tin can.
7. Belfry Group utilise the services of Blakeley`s Waste Management Ltd who hand sift 60% of waste delivered to their centre. Blakeley`s have also provided a 600 Litre `Green` recycling bin into which the waste from the Office Recycling Centre will be put and collected weekly.
8. 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
9. 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 unnecessary or lengthy journeys and automatically keep resultant CO<sup>2</sup> 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 in the reduction of fuel consumption, regular servicing of vehicles is to be carried out in accordance with the manufacturer's recommendations.

### **ENERGY CONSERVATION**

It has been shown 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 has nominated the Quality & Safety Manager 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. Where practicable, all lighting fitted at Belfry Head Office will be Energy Efficient.
  - 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.

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- 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**

Belfry Group will ensure that, wherever possible, purchased consumable materials are manufactured from re-cycled products.

Belfry Group will also ensure that, wherever possible, consumable items are submitted for re-cycling following use.

Examples include:

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

Belfry Group Ltd will recycle for a chosen company, currently the Roy Castle Lung Cancer Foundation, which is coordinated by the Quality & Safety Manager.

The Roy Castle Lung Cancer Foundation will collect the following items:

- a. Ink/Toner Cartridges
- b. Mobile Telephone Equipment

### **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.

**SECTION 4**

**ENVIRONMENTAL IMPACTS**

**Environmental Aspects/Impacts Matrix**

We have conducted a full review of all potential environmental aspects, their potential impact on the environment and discussed at management level how these might be addressed.

The aspects and potential impacts identified were then assessed for 'Significance' within our work environment. Our methodology for determining Significance is detailed below:

<b>Scale</b>	<b>Description</b>	<b>Criteria</b>
1	Negligible	Very small effect
2	Minor	Effect and probability of occurrence are both small.
3	Significant	Effect and probability of occurrence are moderate.
4	Major	Effect is extensive.

We have awarded each of our Aspects a rating based on an assessment made according to our Significance Scale. Finally we reviewed our potential Environmental Impacts and applied the controls in deemed pertinent.

The Register of Environmental Impacts and Aspects can be found in Section 3 of the ISO 14001:2004 File.

**Environmental Action Plan & Targets**

Having identified our Environmental Aspects and Objectives, we have reviewed the actions that we need to take in order to effectively manage our EMS. The responsibility for our EMS is shared by all employees and is overseen by our Environmental Committee, which reviews our Environmental Action Plan (EAP) on a regular basis and reports to our Management Board.

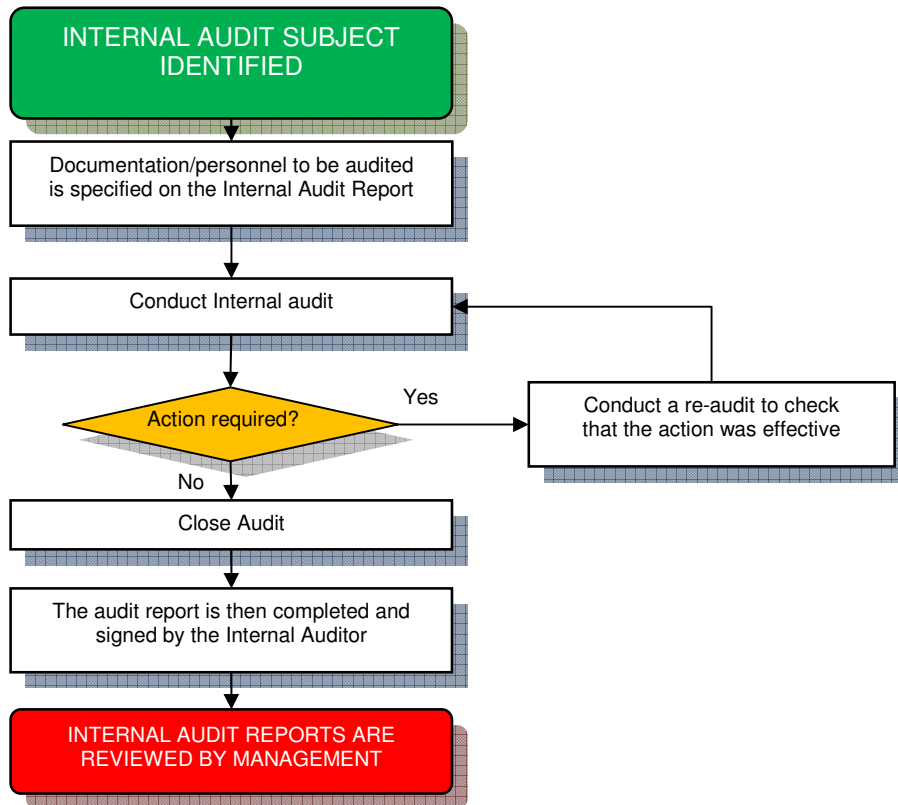
The EAP is a 'live' document and is separate to the Review document. It is updated following management review and version controlled by date of last revision. Each old version is then archived. The EAP is reviewed at least quarterly and internal audits are conducted in line with the EAP review. The audits themselves are scheduled, conducted regularly and recorded using the template listed as part of section 9.1.

<b>Environmental Action Plan (EAP)</b>		
<b>Aspect: Recycling</b>		
<b>Target/objective</b>		<b>Status</b>
1.	Use of existing recycling bins to be communicated to staff	Complete
2.	Use council recycling services for furniture, computers (or preferred provider as required) in order to ensure that all materials are recycled appropriately	Investigation Stage
3.	Use recycled paper where possible	Investigation Stage
4.	Cooperation with local businesses to share contacts and learn from other experiences	Investigation Stage
<b>Aspect: Waste Management</b>		
<b>Target/objective</b>		<b>Status</b>
5.	Set all printers to default lowest impact options (B&W, 2 sided etc.) to save energy and monitor improvements via spreadsheet	Complete
6.	Awareness raising about unnecessary printing practices to reduce paper usage and monitor changes via spreadsheet	Complete
7.	Buy only printers that can print double sided in each office to reduce paper usage and monitor changes via spreadsheet	Ongoing
<b>Aspect: Energy Conservation</b>		
<b>Target/objective</b>		<b>Status</b>
8.	Mailing staff unnecessarily. Reduce mailing from HR and Finance. Use email instead to reduce paper usage and monitor changes via spreadsheet	Investigation Stage
9.	Turning off the lights, computers etc. when people leave the office to reduce electricity usage and monitor changes via spreadsheet	Investigation Stage
10.	General awareness/training re stationary, energy conservation etc. travel, meetings to encourage staff to participate and support initiative	Investigation Stage
11.	Switching to recycled paper; investigate to see whether cheaper in order to promote environmentally friendly printing	Investigation Stage
12.	Switch to energy efficient light bulbs wherever possible to reduce electricity usage and monitor changes via spreadsheet.	Complete
13.	Purchase fair-trade tea and coffee to support environmentally friendly producers with company's purchasing/procurement priorities	Investigation Stage

**Environmental Internal Audits**

Internal audits are carried out regularly as part of the responsibilities of our Environmental Committee and are used to verify our performance against our Environmental Targets.

The audit process is as follows:



Management agrees the audit schedule and feedback on each audit is reviewed.

Senior Management reviews these audits when receiving the results and minutes the discussions and decisions as part of their SMT meeting procedures.

In addition to this the Administration/Operations department reminds all staff to implement the recommendations that are recorded as part of our audits and be mindful of our environmental responsibilities.

Belfry Group Limited’s Environmental Committee, staff updates and our internal newsletter are all vehicles to communicate updates and news.



## ENVIRONMENTAL POLICY

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### Environmental Emergency Procedures

This procedure sets out how Belfry Group responds to environmental emergency situations.

### RESPONSIBILITIES

**Quality & Safety Manager – to maintain and review the Pollution Prevention Plans.**

**All staff** - responsible for the actions to be taken under this procedure.

### PROCEDURE

The organisation shall identify areas and situations that pose a potential risk of environmental pollution.

A pollution risk assessment shall be carried out to determine the level of risk posed to the environment.

Prevention and mitigation measures will be put in place and documented in the Pollution Prevention Plan.

In the event of fire, staff will follow the procedures as set out in the Fire Evacuation Plan.

In the event of oil and chemical spillage, if safe to do so, the spill should be contained using appropriate abatement materials

The spill should be reported immediately by telephone to the Quality & Safety Manager (01925 633 311).

If any of the following may occur the incident will be reported to the Environment Agency by telephone on 0800 80 70 60 (24 Hour).

- i. Damage or danger to the natural environment
- ii. Pollution
- iii. Risks to wildlife
- iv. Fish in distress

All used absorbent materials should be disposed of via specialist waste contractor using the relevant Hazardous Waste Consignment Notes.

An Incident Form should be completed for any emergency & environmental incidents that occur. These will be recorded by the Quality & Safety Manager in the Incident Log.

**Register of Legal Requirements**

<b>Legislation</b>	<b>Available Location</b>	<b>Legislative Compliance</b>
<b>Environment Act 1995</b>	<a href="http://www.hmso.gov.uk">http://www.hmso.gov.uk</a>	Information only
<b>Waste Management Licensing Regulations 1994</b>	<a href="http://www.hmso.gov.uk">http://www.hmso.gov.uk</a>	Ensure waste is controlled
<b>EC Directive on Waste Electrical and Electronic Equipment (WEEE)</b>	<a href="http://www.hmso.gov.uk">http://www.hmso.gov.uk</a>	Ensure computer and electrical equipment is disposed of correctly
<b>Control of Substances Hazardous to Health Regulations 2002 (COSHH)</b>	<a href="http://www.hmso.gov.uk">http://www.hmso.gov.uk</a>	Ensure data sheets are correctly maintained
<b>Smoke Free Regulations 2007</b>	<a href="http://www.hmso.gov.uk">http://www.hmso.gov.uk</a>	Ensure correct use of 'No Smoking' signs throughout premises
<b>F-Gas Air Conditioning Refrigerant Regulations EU (EC 842/2006)</b>	<a href="#">EU Regulation 842/2006</a>	Ensure Refrigerant handled and disposed of correctly and FGAS Record Sheet completed in all cases.
<b>Health and Safety Executive</b>	<a href="http://www.hse.gov.uk/">http://www.hse.gov.uk/</a>	Information and updates received; H&S Officer proactively reads website to update company on latest legislation
<b>Environment Agency</b>	<a href="http://www.environment-agency.gov.uk">http://www.environment-agency.gov.uk</a>	Information and updates received; H&S Officer proactively reads website to update company on latest legislation