

ENVIRONMENTAL POLICY

1. INTRODUCTION

- 1.1 The environmental policy handbook has been written to ensure best environmental practice is maintained throughout the company.
- 1.2 The handbook provides a summary of the most vital laws, regulations, guidelines, practices, procedures and processes that must be addressed, in accordance with the requirements and needs of our company.
- 1.3 The handbook provides guidance only, it is not intended to be substitute for legal requirements and does not impose requirements different from or in addition to, those imposed by law.
- 1.4 The handbook should be viewed as living document and therefore changes frequently due to changes in relevant law and regulations.

2. ENVIRONMENTAL POLICY

- 2.1 MRG Services UK Ltd recognises that environmental issues are of fundamental importance to a successful and responsible business strategy.
- 2.2 As an educational and progressive company, we are committed to minimising the environmental impact of our operations and are continually reviewing and updating working practices to achieve higher standards. The company aims will be, wherever possible:
 - 2.2.1 To ensure that operations comply with current legislative and regulatory requirements.
 - 2.2.2 Strive to design and develop products, which have the minimum environment impacts during our manufacture, use and subsequent disposal.
 - 2.2.3 Reduce the amount of waste produced and dispose of any responsibly.
 - 2.2.4 Reduce the consumption of raw materials, water and fuels.
 - 2.2.5 Recycle materials wherever possible and practical.
 - 2.2.6 Educate our workforce in relevant aspects of environmental best practices and maintain a safe working environment.

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- 2.2.7 Communicate our environmental policy to all levels of the workforce and sites of the company.
- 2.2.8 Review our environmental policy on a regular basis.
- 2.3 MRG Services UK Ltd will foster environmental awareness and understanding in all employees, suppliers, customers, sub-contractors and the public. Where practicable, the company will provide information upon request and assistance to customers on environmental issues arising from its services with the aim for continual improvement in line with legislation and 'Good Practice'.

3. EMPLOYEE RESPONSIBILITIES FOR ENVIRONMENTAL ISSUES

- 3.1 Employees have a responsibility to:
 - 3.1.1 Use appropriate pollution control equipment where it is provided.
 - 3.1.2 Avoid improvisation in any form that may create a risk to the environment.
 - 3.1.3 Maintain all tools and equipment in good condition and report any defects to their supervisor.
 - 3.1.4 Attend and participate as requested any training course/session designed to further the interests of environmental obligations.
 - 3.1.5 Ensure they are aware of the correct disposal routes for solid and liquid wastes including:
 - 3.1.5.1 Cloth
 - 3.1.5.2 Paper and cardboard
 - 3.1.5.3 Solvent, paint and paint tins
 - 3.1.5.4 Liquid wastes and the use of grids/drains
 - 3.1.5.5 Furniture
 - 3.1.5.6 Computers and associated accessories
 - 3.1.6 Ensure the procedure for any environmental clean-up operation is carried out to minimise cross contamination with water, soil and any ecosystems.
 - 3.1.7 Use all-natural resources efficiently and any system which operates using natural resources run at maximum operating efficiency.
 - 3.1.8 Observe fire evacuation procedure and learn position of all equipment and exit routes.
 - 3.1.9 Observe and be familiar with emergency procedures for pollution incidents.

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5. RELEVANT ENVIRONMENTAL LEGISLATION AND GUIDANCE

5.1 Duty of Care Legislation. Waste poses of threat to the environment and to human health if not managed properly and recovered or disposed of safely. Section 34 of The Environmental Protection Act 1990 established of Duty of Care on anyone who produces or imports, keeps or stores, transports, treats, recycles or disposes of controlled waste or to a broker who has control of controlled waste. Breach of the Duty of Care is an offence, with a penalty of an unlimited fine. The duty does not apply to householders with regard to their own domestic waste. Waste producers should:

5.1.1 Keep Waste Safe – Storage. Waste must be protected and stored in order to prevent it from escaping from its container. Waste holders must safeguard against:

- 5.1.1.1 Corrosion or wear of containers
- 5.1.1.2 Accidental spillage or leakage
- 5.1.1.3 Accidents or weather allowing waste to escape
- 5.1.1.4 Waste blowing away or falling off during transport
- 5.1.1.5 Scavenging by Vandals, thieves, children and animals.

5.1.2 Waste to be Collected. Waste left outside premises should be in containers that are strong enough to resist wind, rain and animal disturbance – especially food waste. All containers must be secured or sealed e.g. drums with lids, bags tied up and skips covered. Use of weatherproof labels is an important consideration where waste is stored outside.

5.1.3 Transfer to the Right Person. The Duty of Care states that waste must only be transferred to an authorised person. Check that the person or company is authorised to take delivery and dispose of your waste. (The persons allowed to remove your waste are explained in the separate sheet overleaf). You can either ask to see their authorisation certificate or contact the Environmental Agency.

5.1.4 Documentation. When waste is transferred to another person or company a transfer note must be completed. An accurate description of the waste must be written on the transfer note and must be signed by both persons. The producer and the waste carrier must keep a copy of the transfer note for a minimum of two years. (Records must be made available to the authorities).

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4. GUIDANCE ON THE REGULATION OF WASTE

4.1 Who Are The Authorised Persons?

- 4.1.1 **Council waste collectors:** For most shops and small offices the council will collect you waste. In this case you don't have to do any more checking.
- 4.1.2 **Registered waste carriers:** Carriers of waste (unless exempt) have to be registered. Look at carrier's certificate of registration. Check with the council that issued it that the carrier is properly registered. Ring up the council or go to their offices and ask to see the register they keep.
- 4.1.3 **Exempt waste carriers:** Not all carriers of waste have to be registered. The main people who are exempt are charities and voluntary organisations. If someone tells you they are exempt, ask them why.
- 4.1.4 **Holders of waste disposal or waste management licences:** Some licences are only valid for certain kinds of waste or certain activities. Ask to see the licence. Check that it covers your type of waste.
- 4.1.5 **Persons who are exempt from the requirement to have waste disposal or waste management licences:** There are exemptions for very specific activities and types of waste. If someone claims not to need a licence, check that the exemptions apply in their case.
- 4.1.6 **In Scotland only, Council Waste Disposers:** Check with the council that its resolution (the equivalent of a licence) covers your type of waste.

5. COMPLETION OF PAPERWORK

- 5.1 When waste changes hands, a transfer note must be completed and signed by both parties and a written description of the waste handed over. These two may be a single piece of paper. The Government has published a model form with the Code of Practice, but any forms may be used if they have the right information.
- 5.2 Repeated transfers of the same kind of waste between the same parties can be covered by one transfer note for up to a year (for example, weekly collections from shops).

6. THE TRANSFER NOTE

6.1 The transfer note, to be completed and signed by both parties must include:

- 6.1.1 What sort of containers it is in?
- 6.1.2 The time and date the waste was transferred?
- 6.1.3 Where the transfer took place?
- 6.1.4 The names and addresses of both parties?
- 6.1.5 Details of which category of authorised person each one is?
- 6.1.6 If either or both of the parties, as a waste carrier, has a registration certificate, the certificate number and the name of the council that issued it

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- 6.1.7 If either or both of the parties has a waste licence, the licence number and the name of the council that issued it
- 6.1.8 Reasons for any exemption from the requirement to register to have a license.

7. THE WRITTEN DESCRIPTION

- 7.1 The written description must provide as much information as someone else might need to handle the waste safely.

8. KEEPING THE PAPERS

- 8.1 Both parties must keep copies of the transfer notes and the description for two years. They may have to prove in court where the waste came from and what they did with it.

9. ENVIRONMENTAL WORKING PRACTICES

9.1 Delivery/Storage of Products.

- 9.1.1 Where possible efforts shall be made to purchase and store materials in bulk.
- 9.1.2 Where feasible products and consumables shall be directly delivered to site.
- 9.1.3 Whether products and consumables are delivered direct to site or stored prior to use, designated areas shall be assigned for the storage of each product.
- 9.1.4 Where feasible product packaging and used containers shall be returned to the supplier or reused. Waste packaging shall be collected, stored and disposed of in the most environmentally practicable option available.

10. PLANT AND TECHNICAL EQUIPMENT

- 10.1 When operating plant and machinery or when using materials or chemicals that could have an adverse effect on the environment, staff shall adhere to best-known practices to minimise any impacts. (This includes switching off computers if they are going to be left for periods of longer than 1 hour and turning off the laminator when it is not in use).
- 10.2 Materials identified hazardous, flammable, corrosive or toxic shall be stored carefully in designated areas and shall be clearly labelled. Only persons familiar with their use and storage shall remove materials from stores. Labels shall remain on containers at all times, even when empty or waiting correct disposal.

11. POLLUTION EVENTS

- 11.1 In the event of a small spillage (between 3.5 litres) of solvent-based products or other hazardous liquid materials (e.g. paints) staff shall use an emergency response kit to contain the spillage. An emergency response kit consists of a shovel and sufficient quantities of sand/soil or absorbent granules to cover and contain the spillage. Such kits should be located in all areas where these substances are delivered, stored or used.

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- 11.2 The contaminated sand/soil/granules should be shovelled into a sealed container and disposed of in accordance with the recognised procedures. Staff should notify their supervisors as soon as possible.
- 11.3 For larger spillage's staff should contact their supervisor for further instruction.
- 11.4 Office Manager shall maintain paperwork and records for compliance with the Duty of Care etc

12. ABNORMAL OPERATING CONDITIONS

- 12.1 Breakdown or faulty machines shall be reported to a supervisor. Staff shall not attempt to interfere with machines and equipment unless they are expressly requested to do so and then should continue to exercise the usual care and safety procedure.
- 12.2 Appliances with damaged wiring or faulty working shall not be used until they have been repaired and approved for use by a supervisor. When faulty appliances cannot be moved for repair a clearly visible note shall be fixed on the appliance forbidding its use. A supervisor on satisfactory repair of the appliance shall only remove the note.
- 12.3 Where relevant all safety guards, procedures and environmental controls shall be used at all times.
- 12.4 Failure of such systems should be reported to the supervisor.
- 12.5 A regular programme of preventative maintenance is in place for key plant and equipment. Spares and consumables are available from a supervisor.

13. WASTE

- 13.1 Staff shall take steps to ensure that, they minimise the amount of waste generated by using good working practices and not use more material than is necessary and left over materials should be returned for reuse. Staff should be familiar with the correct disposal routes for various waste types. When there is uncertainty over the correct disposal of an item consult a supervisor or the local Waste Authority for advice.
- 13.2 Staff shall avoid wasting water by using a plug or a bowl for washing and turn taps off once finished.

14. OPERATIONAL CONTROLS

- 14.1 **Cloth** – Staff shall utilise all grades of material to its best potential and minimise wastage.
- 14.2 **Paper and cardboard** – Cardboard is currently separated and removed on a monthly basis to be recycled. Waste paper is currently only generated in small quantities, which cannot be commercially recycled and where possible shall be compressed and disposed of to skip.

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- 14.3 **Solvents and paint** – Excess solvent should be returned to the container. Excess material on brushes and rollers shall be wiped off onto newspaper and rags, which are spread out to dry before being disposed of in sealed containers to the skip. Paint shall be collected and disposed of in sealed containers or bags to the skip for waste removal.
- 14.4 **Furniture** – Where furniture is of a good quality, efforts should be made to pass on or donate the furniture to willing recipients. Where there are no willing recipients or where the furniture is in a poor or dangerous state it should be broken up and disposed of into the skip.
- 14.5 **Miscellaneous** – No material shall at any time be dumped on site or elsewhere and shall be disposed of to the skip. Where there is uncertainty over the correct disposal route for an item staff should consult their supervisor.
- 14.6 **The use of grids/drains** – Under no circumstances shall any material be tipped down girds and drains. An absorbent material such as sawdust, cat litter or sand should be used to soak up small amounts of decorative coatings, which should then be disposed of in accordance with approved procedures.

15. **ENERGY**

- 15.1 Staff shall follow good practice of energy consumption. Specifically, staff shall:
- 15.2 Switch off laminator when it is not in use.
- 15.3 Switch off lights when not in use.
- 15.4 Switch off photocopiers; computers, printers and other electrically powered items when not needed or when leaving office for more than 1 hour.
- 15.5 Switch off the heating when not in use.
- 15.6 Save photocopying and printing until there are several documents that can be copied or printed together.
- 15.7 Avoid opening windows or leaving doors propped open when the heating is on.

15 **HOUSEKEEPING**

- 15.1 All walkways and equipment shall be kept clear of debris (avoid tripping hazards, obstructing gangways, doorways, fire extinguishers & exits etc). Regular tidying will ensure that small consumables are not lost.
- 15.2 Full and empty containers shall be returned to their correct locations.
- 15.3 Consumable products shall be used sensibly, and supervisors shall keep a stock of essential spares and consumables.

16 **OFFICE**

16.1 Where possible staff responsible for purchasing shall:

- 16.1.5 Seek out and use environmentally friendly suppliers of office materials.
- 16.1.6 Refuse existing furniture rather than buy new. Donate unwanted furniture to good causes rather than dump it.
- 16.1.7 Reduce packaging waste by purchasing products in bulk where possible.

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17 LITTER

- 18.1 Due to limited space litter shall be removed from the office site on a regular basis. All employees are responsible for ensuring that their work area is clean and tidy.

18 ENVIRONMENTAL TRAINING AND AWARENESS

- 18.1 An annual check shall be made to ensure that the company is aware of any changes to the legislation to which they adhere.
- 18.2 Staff shall be informed of changes in legislation that affects their working practices. Additional training shall be provided where necessary.
- 18.3 New staff shall be made aware of the company's environmental policy.

19 VISITORS AND SUBCONTRACTORS RULES

19.1 Visitors and Subcontractors shall:

- 19.1.5 Not be permitted onto areas without prior appointment and then must be accompanied or supervised.
- 19.1.6 Observe company rules and regulations regarding all matters associated with the environment.
- 19.1.7 Not touch, attempt to move or remove anything from the site unless permission

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