

	Title	ENVIRONMENTAL POLICY		
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The Dodd Group offers a range of engineering services to main contractors and directly to clients throughout the UK. It operates in four interlinked sectors within the construction and building industry:

- Electrical Services – includes design and installation of High Voltage and Low Voltage distribution, Building Management Systems, Fire Protection, CCTV and Alarm Systems.
- Mechanical Services – includes design and installation of Heating and Cooling Systems.
- Voice and Data Services – specialising in the provision of Voice and Data Cabling from design through to project completion.
- Facilities Management – providing Term Maintenance and Installation Services to Housing Associations, Registered Social Landlords and Property Developers.

We are committed to minimising the environmental impact of our activities and aim to achieve continual improvement in environmental performance by:

- ◆ Setting annual environmental objectives and targets, and monitoring performance
- ◆ Monitoring and reviewing environmental procedures and auditing compliance to ensure standards are being maintained whilst highlighting potential areas for improvement
- ◆ Encouraging sub-contractors, designers and suppliers to adopt environmental policies and management systems that are satisfactory to us
- ◆ Reducing the environmental impacts of our sites and their effects on their local communities by keeping sites clean and tidy; and adopting reasonable controls for preventing air, ground, water or noise pollution
- ◆ Communicating with local communities and others who have an interest in our environmental policies, plans and performance
- ◆ Making use of opportunities to minimise waste and to reuse or recycle materials
- ◆ Training employees and promoting environmental awareness and commitment
- ◆ Ensuring compliance with current legislation, regulations, codes of practice and other requirements on environmental matters relevant to our operations
- ◆ Ensuring the efficient use of natural resources

Each Divisional Director is responsible to the Main Board of Directors for ensuring compliance with the Group's policy and reviewing performance within their operating unit.

Signed



M. C. FARMER – Group Administration Director

ENVIRONMENTAL MANAGEMENT

Dodd Group has put in place an environmental management system which meets the requirements of BS EN ISO 14001:1996. Every Dodd Group site and office operates under this system but to be effective a team effort is required. Everyone from our customers to our suppliers needs to be engaged. Successful environmental management relies on good communication and developing the right attitude.

Accordingly for each office, contract or project the following simple questions must be answered:

- Has the client or main contractor formulated a Site Environmental Plan and has this been checked against the requirements of the Dodd Group standard. Are all environmental aspects identified
- In the absence of a Site Environmental Plan provided by either the client or main contractor has a Dodd Group Site Environmental Plan been formulated?
- Has significance been determined for the environmental aspects?
- Have environmental objectives and targets been set for the site or contract
- Is the environmental policy displayed on the notice board?
- Have all Dodd Group sub-contractors on site completed the SHE competency questionnaire to assess their environmental attitude
- Are site personnel aware of the environmental obligations of the site or contract?
- Has contact been made with the regulatory authorities?
- If appropriate are environmental samples being undertaken on a weekly basis?
- Are environmental newsletters and posters displayed?
- Are Environmental Awareness Talks carried out with operatives?
- Have you as the Project or Contract Manager received training in environmental matters and associated issues
- Have environmental responsibilities on site been clearly defined and understood
- Has an emergency plan been developed for the project or contract and is it reviewed
- Are all environmental incidents and complaints being logged?
- Has there been liaison with the relevant local community

Audits of the environmental management system will be conducted on a regular basis on all sites to ensure compliance and to identify areas for improvement.

A management review will be conducted on an annual basis to ensure the continuing suitability and effectiveness of the EMS. The review will address the environmental dimensions of all activities of the business and their impact on financial performance and our competitive positioning.

FURTHER GUIDANCE

- BS EN ISO 14001:1996 Standard

EFFLUENT AND WATER

The construction industry is responsible for over 50% of all reported pollution incidents every year. Most pollution incidents are avoidable by careful planning. Before commencing work on site, Dodd Group will request from the client or main contractor evidence that a survey has been carried out to establish the location of local streams, ditches and drainage systems. In cases where Dodd Group is the main contractor it is the responsibility of the project manager to ensure that such a survey is carried out. Remember that pollution on a site can damage areas up to 5 miles away. The most common pollutants are silt, concrete and cement and oil. All environmental legislation is based around the 'Polluter Pays Principle' so if we do pollute we will pay

SOIL

- Where trenching is required Dodd Group will minimise the amount of exposed ground and soil stockpiles
- Where possible, prevent water entering an excavation
- For all works within 5 metres of a watercourse, consent must be obtained from the Environment Agency

OIL & CHEMICALS

- Dodd Group will ensure all refuelling operations are carried out in a designated area away from watercourses and drains. Sand is a useful barrier to protect sensitive areas or to block drains during refuelling
- To minimise leaks all plant and equipment will be regularly maintained. Drip trays will be used where appropriate
- All valves and nozzles will be secured to protect from vandalism
- Biodegradable oils will be used when working in or near watercourses
- An emergency response plan must be established prior to commencement of works.
- An appropriate environmental spill kit will be available.

GENERAL

- Dodd Group activities generate considerable waste particularly from packaging it is therefore imperative that measures are put in place to prevent litter being blown into watercourses
- Drainage systems must be clearly marked on the emergency plan
- Drains should be colour coded on all site plans i.e. red for foul and blue for storm drains
- Water pollution monitoring will where appropriate be carried out before commencement on site and at regular intervals during the construction phase

FURTHER GUIDANCE

- Local Environment Agency office

HAZARDOUS SUBSTANCES

Many of the materials used in construction operations such as oils, chemicals, cement, lime, cleaning materials and paint have the potential to cause serious pollution. Dodd Group has a legal obligation to store hazardous substances in the correct manner to avoid the risk of a pollution incident occurring.

Dodd Group has therefore defined specific control measures to ensure our obligations are met.

- All containers that contain potential pollutants i.e. fuels, oils, chemicals must be stored securely
- All containers must be clearly labelled so the appropriate remedial action can be taken in the event of a spillage
- Daily inspections will be made of fuel and chemical stores. To ensure they are structurally sound and strong any associated taps & hoses will also be inspected
- To prevent damage from vandalism - valves and nozzles should be vandal and tamper proof
- All fuels, oil and chemicals storage must be sited on an impervious base to avoid the risk of groundwater contamination
- All fuel containers must have a secondary containment system - bunds must be at least 110% of the volume stored
- Any pumps sited outside the bund must be fitted with a non-return/check valve installed in the feed line
- Bunded areas where practical should be fitted with a cover to prevent the area becoming filled with rainwater or slops
- Any valve, filter, sight gauge, vent pipe must be situated within the secondary containment system
- Wherever possible the storage of fuel, oil and chemicals at or above roof level should be avoided
- COSHH assessments must be held on site for all hazardous substances, such records must be within the appropriate Health & Safety Plan.
- Site tanks and drums away from vehicle movements to prevent damage
- Designate a bunded refuelling area
- All refuelling must be supervised
- Maintain all plant and equipment to prevent spillages

REMEMBER

- Storage of fuel, oil and chemicals at or above roof level should be avoided
- Leaking and empty drums must be removed from site immediately
- Disposal of products or empty containers must be via a licensed contractor and in accordance with the COSHH assessments
- Do not site tanks or drums where there is a direct link to surface watercourses or sewers

FURTHER GUIDANCE

- Pollution Prevention

NUISANCE

Dodd Group operations will generate noise, vibration and dust these being the most common forms of nuisance. All of them can result in enforcement notices, off site complaints and poor public relations. High vibration levels over a sustained period of time can also cause damage to buildings and sensitive equipment within buildings such as computers. Adequate planning and good management can influence the implementation and success of control measures.

- Where appropriate Dodd Group will liaise with the local environmental health officer (EHO) before commencing work on site. If working in a sensitive area, a Prior Consent may be required from the EHO
- Where practicable, Dodd Group will limit the amount of time during which noisy activities take place, where possible seeking agreement with neighbours to ensure minimum dissatisfaction.
- Dodd Group will where practicable, change the working method or mode of operation to produce less noise.
- Dodd Group will communicate the site working hours to all personnel and ensure these are complied with. Delivery times will be arranged to suit the area. Considering particularly the location of local housing and schools.
- Dodd Group will where appropriate consult with the surrounding community. This could be by letter drop, newsletter or community briefing sessions
- Dodd Group will where practical specify machinery with mufflers or silencers.
- Dodd Group will where practical erect acoustic screens around noisy machinery, ensuring the screen is as close to the source as possible
- Dodd Group will carry out Noise Risk Assessments surveys in sensitive areas.
- Dodd Group will endeavour with the assistance of our supply chain partners to route delivery and construction vehicles away from residential areas where practicable.
- Dodd Group will endeavour to minimise dusty activities on site by damping down using water or a water based product containing chemical additives.
- Dodd Group will provide windbreaks for stockpiles.
- Dodd Group will where practical always clean the wheels of vehicles leaving site to minimise mud on surrounding roads.
- Dodd Group will endeavour with the assistance of our clients not to store materials directly next to the site boundary where they could be vandalised or stolen.

- Dodd Group will never burn waste on site.
- Dodd Group will not operate machinery outside the site hours.

FURTHER GUIDANCE

- BS5228 Noise control on construction and open sites

POLLUTION CONTROL

Most of Dodd Group activities carried out on site have the potential to cause significant environmental harm. By careful planning and following best practice, we can minimise the risk of an incident occurring. Ensuring appropriate pollution prevention measures are in place and the contingency or emergency plan is communicated to everyone on site, pollution incidents should be avoided.

- A clear drawing identifying the site drainage system will be available on site.
- An inventory of all substances stored on site should be retained with the Dodd Group Health & Safety Plan. This should include quantities stored.
- Environmental spill kits are required for all relevant hazards and will be available on all relevant sites or contracts in sufficient quantity.
- Spill kits must be readily identified and in an accessible location.
- Buckets of sand can be used as an effective material for containing a spill.
- All personnel should be trained in the use of the spill kit. Training will be made available.
- COSHH assessments will be available for clean up and disposal advice
- Appropriate PPE will be provided and must be worn when dealing with a spillage
- Disposal of contaminated spill kits, land or PPE will be carried out in the appropriate manner. Details of which will be provided by the Group Environmental co-ordinator.
- A waste transfer note will be completed for all contaminated material.
- Substances posing particular risks will be highlighted in the Emergency plan.
- Dodd Group will ensure personnel have designated responsibilities in spill response.
- Key contact numbers must be displayed on the Emergency Plan contained with the Project or Contract Health & Safety Plan.
- Dodd Group will ensure that the emergency procedures are communicated to all personnel during the relevant induction.
- All environmental incidents must be reported to the project or contract manager and then to the director responsible for environmental matters immediately. Where appropriate the director responsible for environmental matters will liaise with the Environment Agency or relevant enforcing authority.
- All other environmental incidents should be recorded on the Environment Reporting Database.

WASTE MANAGEMENT

Dodd Group, will through innovative design, and careful procurement procedures endeavour to minimize the amount of waste generated by its activities. Consideration will be given not only to the product or service initial cost, but also to the whole life cost, which will include such factors as ongoing energy consumption costs, maintenance costs and final disposal costs, consideration will also be given to recycling potential. All of these factors having substantial environmental impacts.

All sites or contracts must have a waste management plan which will identify the key waste streams, the quantities of waste to be generated and storage, handling and disposal procedures.

- Dodd Group will always adopt the 3R's principle - Reduce, Reuse, Recycle
- Site waste where possible will be segregated.
- When adopting a segregation scheme Dodd Group will ensure clear communication of the procedures to our supply chain through meetings, inductions and project/contract environmental talks
- All waste will be stored on site to prevent its escape and disposed of in the correct manner
- Copies of the waste carriers registration documents will where appropriate be display on the notice board
- Waste Transfer Notes will be completed for all waste being removed from a site.
- All waste transfer notes will be retained for a minimum of 3 years.
- Materials will be stored in a secure weatherproof area.
- Over ordering should be avoided, thus minimising the potential of waste, similarly all deliveries should be carefully inspected and checked for conformity to specification prior to acceptance, thus again eliminating the potential for waste.

SPECIAL WASTE

Dodd Group is aware that during the course of its activities certain types of special waste will be generated for example fluorescent tubes and asbestos are classified as special waste and must dealt with in a specific way. All special waste must have a special waste consignment notice and where appropriate the Environment Agency must be pre-notified of its movement. Such documents will be stored in a secure place.

- All special waste will be stored in a safe manner and be clearly labelled

REMEMBER

- Follow the COSHH assessment
- Do not mix special waste with non-special waste
- Do not mix different types of special waste

FURTHER GUIDANCE

- Local Environment Agency office

WILDLIFE & NATURAL FEATURES

Wildlife and natural features are vital to quality of life and a healthy environment. Dodd Group will adopt a responsible attitude by ensuring our activities cause the least damage to the surrounding environment.

- Contract conditions will be checked to see if any designated ecological sites or protected species are identified
- Good public relations is important to ensure we have proper regard for ecological issues on site
- Information regarding protected species will be communicated to our supply chain
- Sensitive habitats will be fenced off and vehicles and plant kept away.
- Dodd Group will liaise with nature conservation bodies if carrying out work which may affect a Site of Special Scientific Interest (SSSI). It is an offence to carry out works on a SSSI without the permission of the nature conservation bodies
- Dodd Group will endeavour not to disturb habitats. Bats, badgers, snakes and reptiles are all protected species. Specialist advice will be sought if discovered on a particular site

ARCHAEOLOGY

Planning conditions require an archaeological survey to be carried out prior to commencing work on site. Even if ruins are identified, there is a potential for unexpected finds to be uncovered during works. If this is the case, work will be stopped immediately and the area protected.

Dodd Group is legally required to report all finds of treasure or burial sites to the appropriate authorities.

FURTHER GUIDANCE

- Heritage Bodies/English Nature
- PPG16 Archaeology and Planning