



# ENVIRONMENTAL MANAGEMENT

## *Environment and Sustainability Policy*

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# 1 INTRODUCTION

## 1.1 THE COMPANY



Blade Wind Services Ltd provides specialist services to the wind energy sector. With a truly global service our team of expert technicians provide a range of services for wind turbine generators (WTG) including, but not limited to:

- Wind turbine inspections.
- Rotor blade and tower cleaning.
- Rotor blade repairs.
- Wind turbine performance upgrades.
- Wind turbine planned maintenance programme.

The Company has a focus on safety and quality having a professional yet personal approach to ensure we understand our Clients and their site objectives.

Our support enables our Clients to reduce their site downtime, maximise their asset performance and increase their overall medium to long-term margins.

## 1.2 ENVIRONMENT AND SUSTAINABILITY MANAGEMENT SYSTEMS



This document is the Environment and Sustainability Policy of Blade Wind Services Ltd, and as such sets out the Company's aims and objectives for minimising the impact of its operations on the environment.

Blade Wind Services Ltd regards environmental protection as being an important function of management at every level, with responsibility for the observance of good environmental standards and practices resting firmly with the Director with Responsibility for Safety, Health and the Environment, supported by all Employees.

In cooperation with Management, every Employee also has a legal duty under Regulations to observe safe standards and practices and it is the policy of the Company to ensure that, as far as reasonably practicable, Employees are provided with safe and healthy working conditions. Therefore, a good working environment can only be maintained with the cooperation of all those who work in it.

The HSE publication **HSG 65 Managing for Health and Safety** methodology is followed in order to establish a framework for an Environmental Management System of which this Policy is the cornerstone.

HSG65 promotes a simple message that organisations need to manage Health and Safety with the same degree of expertise and to the same standards as other core business activities, if they are to effectively control risks and prevent harm to people.

The same approach can be followed for an Environmental Management System (EMS) and this is therefore adopted by Blade Wind Services Ltd with assistance from our Health, Safety and Environment Advisors – MD Safety Management.



The "Plan, Do, Check Act" framework allows the organisation to identify the key actions needed in each part of the cycle and relate them back, where appropriate, to leadership, management, worker involvement and competence. The framework is based on a plan that is proportionate to the risks.

A summary of the steps involved is given below:



- ✓ An effective Environment Policy sets the strategic direction of the organisation.
- ✓ Planning and coordination of the Policy is essential for the Management System to be effective.



- ✓ Identify the risk profile of the organisation.
- ✓ Coordinate the actions of those responsible for controlling the risks.
- ✓ Implement the Risk Control System (RCS).



- ✓ Monitoring the effectiveness of the Risk Control System is vital to measure performance.
- ✓ Investigating accidents and incidents will help prevent recurrence and improve performance.



- ✓ Regular audit and review will enable confirmation if existing arrangements are still valid.
- ✓ Incorporating results will allow learning lessons for personnel and the organisation.

## 2 PLAN – ENVIRONMENT AND SUSTAINABILITY POLICY

An Environment and Sustainability Policy is:



*A written statement by an employer stating the company's commitment to developing arrangements to minimise adverse effects on the environment*

- Identify the company's current position and where it needs to be.
- Identify what needs to be achieved, who will be responsible for what, how identified aims will be achieved, and how success will be measured.
- Decide how performance will be measured. Consider methods that go beyond accident figures, look for leading indicators as well as lagging indicators.
- Consider fire and other emergencies. Co-operate with anyone who shares the workplace and co-ordinate plans with them.
- Plan for changes and identify any specific legal requirements that apply.



The purpose of this Environment and Sustainability Policy is to demonstrate the Company environmental management structure and arrangements.

The arrangements are:

- Underpinned by effective staff involvement and participation.
- Sustained by effective communication and the promotion of competence that allows all Employees to make a responsible and informed contribution to the Environmental effort.

There is a shared common understanding of the organisation's vision, values and beliefs. A positive culture is fostered by the visible and active leadership of senior managers.

Blade Wind Services Ltd is controlled by its Directors, namely Steve Robinson, Mark Bell and Jamie Bairstow.

Steve Robinson is identified as the Director with the Director with Responsibility for Health and Safety. Where and when appropriate, there may be delegation of some Health and Safety duties to a Health and Safety Coordinator or to a specifically nominated person on a defined basis.

The policy of Blade Wind Services Ltd is to attain and maintain high standards of environmental performance and to this end the Company will pursue continual improvement from year to year. Blade Wind Services Ltd will ensure so far as is reasonably practicable, that we:

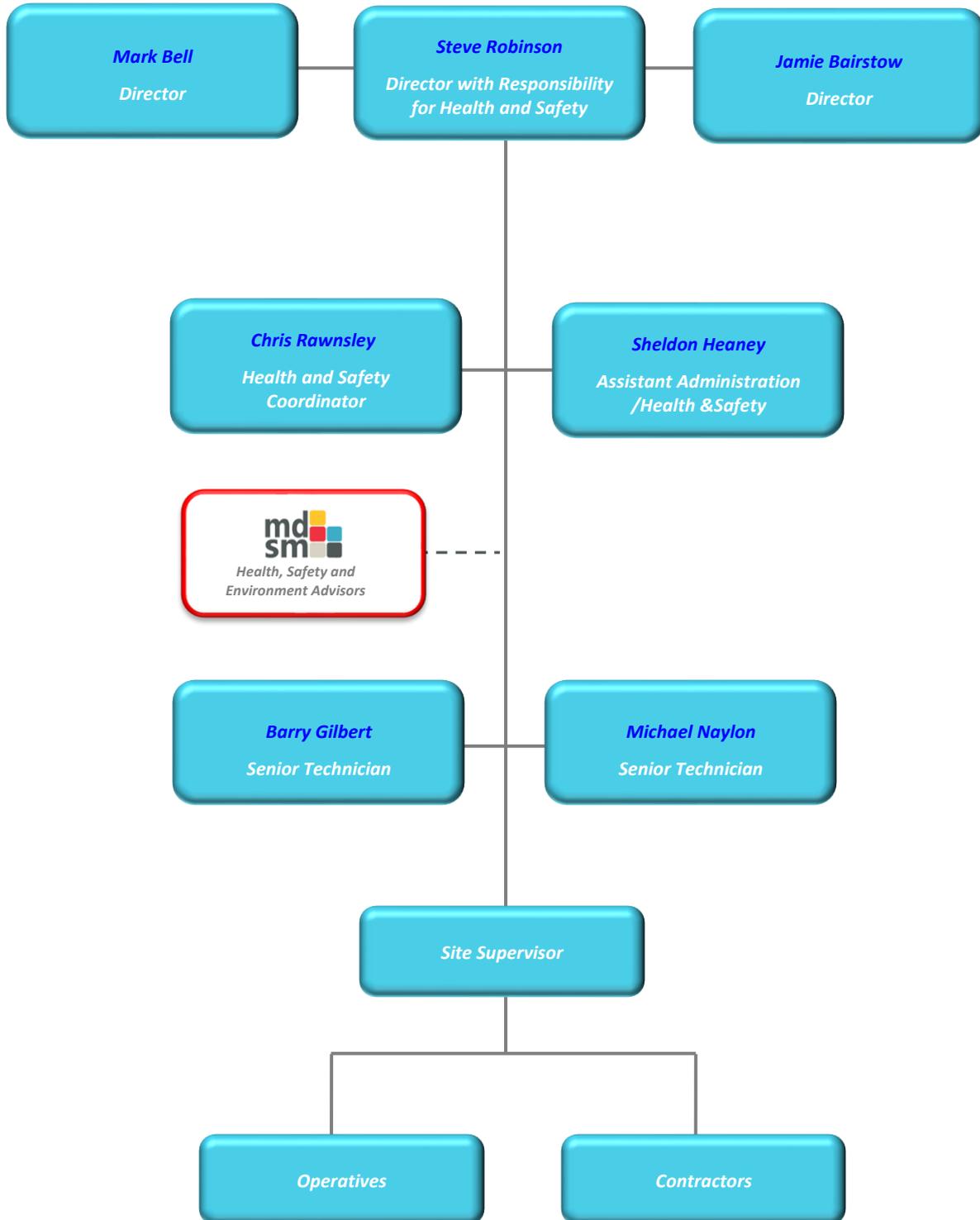
- Understand and comply with all necessary environment legislation and operate to the good practices of industry.
- Assess the environmental impacts of our operations. For example, from the use of Work Equipment (WE) and materials to the collection and ultimate disposal of wastes.
- Employ a consistent framework for the management of environmental issues during our operations.
- Reduce waste, conserve energy and explore opportunities to re-use and recycle.
- Endeavour to develop innovative processes that can reduce levels of environmental impact.
- Collaborate with our Suppliers and Clients to establish a greater environmental awareness.
- Remain alert and responsive to developing issues, knowledge and public concern.
- Ensure that our Employees are aware of the Environment and Sustainability Policy and are motivated to apply it.
- Ensure that our Employees are aware of their own responsibilities and that they are given the support, information, instruction and training necessary to fulfil them.
- Emphasise that the Company's focus is on pollution prevention rather than abatement.
- Choose materials and resources with regard to their long-term sustainability.

The Company appreciates the importance of the Environment and Sustainability Policy and to ensure its successful operation must take into consideration the views of its Employees. Therefore, the Company will strive to develop a positive culture based on consultation, cooperation and communication.

Adequate resources will be made available to meet the requirements of the policy, the *Environmental Protection Act 1990* and any other associated environmental legislation.

Blade Wind Services Ltd will ensure the continuous monitoring of the Environment and Sustainability Policy to ensure its objectives are met. To this aim the Company will ensure that the Policy is reviewed and updated at regular intervals to reflect legislative and/or organisational changes.

<b>Name:</b>	<b>Steve Robinson</b>
<b>Signature:</b>	
<b>Position:</b>	<b>Director with Responsibility for Health, Safety and the Environment</b>
<b>Date:</b>	<b>7<sup>th</sup> August 2020</b>



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## 2.3. DUTIES - DIRECTOR WITH RESPONSIBILITY FOR SAFETY, HEALTH AND ENVIRONMENT

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The Director with Responsibility for Safety, Health and Environment will, so far as is reasonably practicable:

1. be ultimately responsible for all environmental arrangements and ensuring that they are effectively implemented.
2. ensure that sufficient resources are made available for Duty Holders to suitably undertake their duties to comply with both legal and Client requirements.
3. ensure that arrangements for the Policy are reviewed as often as appropriate, and as a minimum at least once a year.
4. ensure that monitoring of the Policy is undertaken as necessary.
5. ensure the arrangement of an adequate system of environmental incident reporting and investigation.
6. ensure the arrangement and implementation of a system of discipline for cases where a breach of this Policy occurs or where duties are not undertaken.
7. ensure that Employees remain aware that environmental requirements apply to operations undertaken from any of the Company's premises and also to operations that may occur at Clients' premises, such as Asbestos sampling and removal operations, including the observance of Clients' environmental provisions.
8. ensure that, in furtherance of its common law and statutory duties such as the *Employers' Liability (Compulsory Insurance) Act 1969*, Company Insurances are kept up to date and prominently displayed so as to be available for inspection at all reasonable times.

The Director with Responsibility for Safety, Health and Environment will also ensure that, in accordance with the *Employers Liability (Compulsory Insurance) Regulations 1998*, that the level of cover shall in aggregate be not less than £5 million.

9. ensure that when the Company employs Contractors, so far as is reasonably practicable, these Contractors are made aware of, and are subject to, the Company's Environment and Sustainability Policy.
10. ensure that any necessary information and training for the requirements of Safe Systems of Work (SSoW) are provided by the Company, or by the Client as appropriate.

For example, this includes, where appropriate, any processes concerned with special hazards related to Safe Systems of Work (SSoW), the operation of machinery or other methods of working.

11. ensure that suitable and sufficient Risk Assessments are undertaken in compliance with the *Management of Health and Safety at Work Regulations 1999*.

The Director with Responsibility for Safety, Health and Environment is also ultimately responsible for ensuring that the results of these are communicated to all Employees.

12. when thought appropriate, delegate some environmental duties to another Director, to a Manager, to a Supervisor or to a specifically identified Employee.
13. be responsible for the arrangement of all environmental arrangements on the Company premises.
14. ensure that information is given to Employees on general environmental topics.
15. ensure that when amendments are made to the Policy these amendments are circulated to all Employees and signed off by all Employees.

16. ensure that all accidental release control arrangements are communicated to all Company Employees.

The Director with Responsibility for Safety, Health and Environment will also ensure that all release control arrangements are regularly inspected and maintained.

17. ensure that all Employees do not engage in "horse-play" or practical jokes.
18. ensure that adequate instruction is given for the operation of any plant, machinery or Work Equipment (WE), including those items used to control accidental releases.
19. ensure that all plant, machinery or Work Equipment (WE) provided is regularly inspected and maintained to ensure that it remains suitable for the purposes for which it was intended.
20. observe all Company and Client Site Rules.

The Health, Safety and Environment Coordinators will, so far as is reasonably practicable:

1. assist in coordinating safety arrangements with the Directors with Responsibility for Health, Safety and Environment, and Site Supervisors as required.
2. attend regular Directors' meetings and discuss Environmental issues.
3. promote the Environmental Management System of the Company as an integral part of the way in which the Company operates.
4. ensure that information is given to Employees on general safety topics and any necessary specific information concerned with day-to-day operations.
5. ensure that any environmental near misses involving Employees, Contractors or others must also be reported to a Director with Responsibility for Health, Safety and Environment.
6. be responsible for setting a good personal example and to ensure that when others fail to consider their own well-being and that of others around them that they are counselled and/or disciplined as necessary.
7. when thought appropriate, delegate some Environmental duties to the Site Supervisor or to a specifically nominated Employee and ensure that all relevant personnel are made aware of the duty changes.
8. ensure that Employees do not engage in "horse-play" or dangerous practical jokes.
9. observe all Company Environment Rules.

Health, Safety and Environmental Consultants are employed on a demand basis by the Company to advise as far as is reasonably practicable, on:

- General Health, Safety and Welfare.
- Environmental Management.

When Consultants are used, they shall, so far as is reasonably practicable:

- ✓ Ensure they are competent to undertake the work required of them.
- ✓ Ensure enrolment on a programme of Continuing Professional Development or other lifelong learning scheme.
- ✓ Carry appropriate Professional Indemnity (PI) Insurance.
- ✓ Report to a Director.
- ✓ Advise Company Management to an agreed level.

The Consultant services can include:

1. advice regarding current UK Environmental Legislation.
2. assistance in producing, reviewing or updating Company Environmental documentation.
3. assistance in advising on the legally required notification to the Enforcing Authority following an Environmental incident.
4. assistance in undertaking Site Environmental Inspections and Audits, where required for specific contracts.
5. assistance in incident occurrence investigation to determine root causes and to prevent recurrence.
6. assistance in providing information on request to the Company regarding good practice for Environmental Management.

Site Supervisors will as far as is reasonably practicable:

1. cooperate with the Company's Environment Policy in meeting any environmental requirements.
2. work closely with the Health, Safety and Environment Coordinators and the Directors with Responsibility for Health, Safety and Environment in the implementation and supervision of Company environmental arrangements.
3. assist the Directors with Responsibility for Safety, Health and the Environment and the Health, Safety and Environment Coordinators in the implementation and supervision of environmental arrangements.
4. assist the Directors with Responsibility for Safety, Health and the Environment and the Safety, and the Health, Safety and Environment Coordinators in the dissemination of general environmental information to Employees and Contractors, including any specific environmental information concerned with day-to-day operations.
5. ensure that any environmental incident involving Employees or Contractors during Company operations is reported immediately to the Director with Responsibility for Safety, Health and the Environment.

Any environmental near misses involving Employees, Contractors or others must also be reported to the Health, Safety and Environment Coordinators or to a Director with Responsibility for Safety, Health and the Environment.

6. make suggestions whereby any detrimental impacts to the environment caused by current working practices could be eliminated or reduced.
7. ensure that environmental instructions are incorporated into routine orders and that they are obeyed by all Site Supervisors and Contractors working at the Deeside premises.
8. be responsible for setting a good personal example and to ensure that when others fail to adequately consider the well-being of the environment, they are counselled and/or disciplined as necessary.
9. ensure that Site Supervisors and Contractors do not engage in "horse-play" or practical jokes.
10. not interfere with, or misuse or abuse anything provided by the Company to protect the environment.
11. ensure that all materials and Work Equipment (WE) are used correctly and to maintain such items in good condition.
12. be aware that only suitably trained and, where relevant, certified Employees are allowed to operate Work Equipment (WE). The Company will ensure that, when required, adequate instruction is given for the use of these items.
13. use all relevant accidental spillage control arrangements provided, when required.
14. delegate environmental duties, as required, to a specifically identified Employee. It is the duty of the Site Supervisor to ensure this information is communicated to all Site Supervisors and Contractors, as required, to ensure that all relevant persons are aware of the duty changes.
15. supervise activities so as to avoid damage to the environment during work activities.
16. not engage in "horse-play" or practical jokes.
17. observe all Blade Wind Services Ltd Environmental Rules.

For the purposes of Safety, Health and the Environment, all Employees have the same duties.

All Employees have a duty, so far as is reasonably practicable, to:

1. avoid damage to the environment whilst undertaking their work activities.
2. cooperate with the Company's Environment Policy in meeting any environmental requirements.
3. report immediately to the Site Supervisor or to a Director with Responsibility for Safety, Health and the Environment, as appropriate, any environmental incident involving Employees or Contractors during Company operations.
4. make suggestions whereby any detrimental impacts to the environment caused by current working practices could be eliminated or reduced.
5. not interfere with, or misuse or abuse anything provided by the Company to protect the environment.
6. ensure that all materials and Work Equipment (WE) are used correctly and to maintain such items in good condition.
7. be aware that only suitably trained and, where relevant, certified Employees are allowed to operate Work Equipment (WE).
8. use all relevant accidental spillage control arrangements provided, when required.

The Company will ensure that, when required, adequate instruction is given for the use of these items.

9. not engage in "horse-play" or practical jokes.
10. observe all Blade Wind Services Ltd Environmental Rules.

Contractors should note that the requirements given below form the basis of Environmental Rules for Blade Wind Services Ltd Contractors.

All Contractors have a duty, so far as is reasonably practicable, to:

1. comply with the Blade Wind Services Ltd Environment and Sustainability Policy and must, where appropriate, ensure their own Company Environment and Sustainability Policy and Arrangements are made available.
2. provide Method Statements and relevant Risk Assessments when carrying out activities which could be detrimental to the environment.

Method Statements must be agreed with Managers, a Director or with the Director with Responsibility for Safety, Health and Environment before work begins and copies of Method Statements and Risk Assessments made available on-site so that compliance with the agreed Method Statement can be monitored/maintained.

3. ensure that any equipment used by Contractor's Employees is competently inspected to ensure that it is maintained in accordance with the *Provision and Use of Work Equipment Regulations 1998*.
4. ensure that their Employees do not interfere with, or misuse or abuse anything provided by the Company or the Client to protect the environment.
5. report immediately to a Manager, a Director or to the Director with Responsibility for Safety, Health and Environment, any environmental incident involving any of its Employees or any other Contractors Employees, during Company operations.
6. ensure that their Employees obey any environmental instructions given by Blade Wind Services Ltd.
7. ensure that any material or Substance brought onto Blade Wind Services Ltd premises or that of their Client's is stored in accordance with relevant Regulations and current recommendations.
8. ensure that workplaces are kept tidy and any debris, waste materials, etc. is cleared away and appropriately disposed of in adherence with Local Authority (LA) Guidelines.
9. ensure that appropriate accidental release control arrangements are provided for use during their operations on Blade Wind Services Ltd premises or that of their Client's.
10. ensure that any accidental releases are cleaned up immediately utilising appropriate release control equipment and materials and ensure that any waste materials are disposed of in adherence with Local Authority (LA) Guidelines.
11. not engage in "horse-play" or practical jokes.
12. comply with the environmental requirements of Blade Wind Services Ltd Client's when undertaking on-site operations.
13. observe all Company and Client Site Rules.

### 3 DO - ENVIRONMENTAL MANAGEMENT

Environmental Management Arrangements are those that:



*comprise the framework of processes and procedures used to ensure that an organisation can fulfil all tasks required to achieve its objectives through a process of continuous improvement*

There is a planned and systematic approach to implementing the Environment Policy through an effective Environmental Management system.

The aim is to minimise risks. Risk assessment methods are used to decide on priorities and to set objectives for eliminating hazards and reducing risks.

Wherever possible, risks are eliminated through selection and design of facilities, equipment and processes.

Performance standards are established and used for measuring achievement. Specific actions to promote a positive Environmental culture are identified.

Detailed in this section are the general arrangements that have been put in place to control Environmental impacts in the Company, based on the risks identified in Risk Assessments and any other requirements from current Legislation.

The arrangements are communicated to all Employees and any necessary additional information or training that has been identified is also provided.



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#### 3.1 CARBON FOOTPRINT



The Company is committed to minimising the use of Carbon-based fuels where possible and minimising emissions where possible.

The Company will endeavour to use renewable energy sources or sources that are naturally low-emission or emission-free. The Company values the concept of sustainability and wishes to reduce our carbon footprint through a variety of methods including:

- Eliminating vehicle use where possible, such as using Advanced Metering Infrastructure to avoid vehicle travel.
- Improving fuel efficiency for our vehicles – including researching hybrid and electric vehicles.
- Increasing overall energy efficiency in our buildings.
- Encouraging and rewarding our Contractors to conserve energy.
- Supporting our Client initiatives in respect of low Carbon strategies.

The Company acknowledges that climate change requires a shift in thinking as well as meaningful changes in how we conduct our business. Our desire to protect the environment grows stronger as the level of climate change increases, and we experience more weather-related catastrophes.

The Company is committed to:

- Continuously monitor and reduce our carbon footprint.
- Improve our operational efficiency.
- Engage our supply chain in supporting sustainable business practices.
- Provide our customers with opportunities to cut their energy use.
- Communicate the results of our efforts on a regular basis.

The Company recognises the need for Employee training, technical knowledge and experience as this is seen to be a necessary requirement to reduce the level of risk to the environment. The Company identifies and implements training needs for environmental requirements. All Employees are trained in the use of all relevant plant and equipment prior to their use.

The Company ensure that its operations are properly planned and Employees versed in their use by a competent person. Special emphasis is given to on-site work and to any work practices which the Company infrequently undertakes so as to ensure that any risk to the environment is minimised.

Records of both official and "on-the-job" training will be kept by the Company and made available for inspection where and when necessary.

The Company aims to reduce consumption of resources at all levels throughout operations both at the Company premises and for on-site work.

### 3.3.1 Electricity

The Company is aware that conserving energy is important not only to reduce demand on finite resources but also to reduce overheads. In order to achieve this the Company encourages Employees to:

- Switch off electrical appliances when not in use.
- Switch off appliances rather than using "stand-by" functions.
- Using rechargeable batteries for battery-powered appliances.
- Switching off electrical lights when not in use.

### 3.3.2 Gas

The Company premises are double glazed and energy efficient so heat loss is minimised as far as possible. However, the Company further aims to reduce heating bills by careful management of office and factory temperatures. Temperatures will be set at realistic levels rather than too hot and doors and windows will be shut so that heat loss will be minimised.

### 3.3.3 Water

The Company does not use large volumes of water but undertakes management strategies to ensure water is not wasted. These include:

- Effective maintenance of all water systems undertaken regularly to prevent leakage.
- Ensuring taps are turned off.
- Encouraging Employees to use water wisely.
- Asking the water company to help identify where water savings can be made.

Blade Wind Services encourages energy saving initiatives by Employees and uses metering to monitor actual energy consumption in order to obtain data to assist in benchmarking.

The use of Dangerous Substances is controlled by the *Dangerous Substances in Explosive Atmospheres Regulations 2002 (DSEAR)*.

There are two (2) categories of Dangerous Substances:

- 1) "Absolute" Hazardous (containing Dangerous Substances at levels above specific thresholds).
- 2) "Mirror" Hazardous (containing combinations of wastes and including Dangerous Substances below specific thresholds).

Dangerous Substances are those used (or present) at work that could, if not properly controlled, cause harm to people as a result of a fire or explosion. These Substances include Flammable Liquids such as petrol.

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### 3.5 ENERGY



The Company is committed to improving the energy and carbon performance of its operations by developing a culture of continuous improvement, through monitoring, setting targets, training and communication.

Our long and medium-term goals are:

- Commit organisational resources to energy management.
- Continual improvement in energy performance.
- Review energy efficiency investments.
- Reduce CO<sub>2</sub> emissions.
- Procure renewable energy sources.

Our short-term objectives are:

- Monitor energy usage through consumption data.
- Communicate improvement measures to all staff on an annual basis.
- Comply with all legislation, standards and practices relating to energy use at both a company and individual level.
- Provide support and resources to ensure our operations are run in a manner that demonstrates both good professional practice and our commitment to this policy.
- Support, along with our Contractors, the purchase of energy efficient products and services and design for energy performance improvement.
- Consider a life cycle perspective when assessing capital and operational costs of energy efficiency investments.

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### 3.6 ENVIRONMENTAL DAMAGE



Blade Wind Services will ensure compliance with the *Environmental Damage (Prevention and Remediation) Regulations 2009*. The Company understands that "environmental damage" means:

- Adverse effects on protected species or habitats (or a Site of Special Scientific Interest (SSSI)).
- Adverse effects to surface water or groundwater (by contamination leading to a reduction in water quality).
- Adverse effects to land (by contamination resulting in a significant risk of adverse effect on human health).

Blade Wind Services will take all reasonable steps to prevent environmental damage, however in the unlikely event that environmental damage is caused, the Company will:

- Take immediate action to prevent further damage.
- Notify the relevant Enforcing Authority of the damage.
- Assist in the identification of remedial measures.
- Implement such remedial measures as is required to remediate the damage to an acceptable level.

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### 3.7 ENVIRONMENTAL IMPACTS



The Company undertakes an informal assessment of the impacts a particular contract may have on the surrounding environment during its duration and beyond.

Even though an Environmental Impact Assessment (EIA) is not mandatory for this type of operation, the Company feels that it is important to foster a positive environmental culture for Employees and Clients alike.

The Company will undertake its operations using the Best Practicable Environmental Option (BPEO). For example, this may involve continuing research into the best methods to ensure dust reduction and to ensure that Company operations do not cause the pollution of any groundwater or watercourses, etc.

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### 3.8 PURCHASING



The Company aims are to purchase products from Suppliers who can demonstrate that the products originate from a renewable resource, for example paper products from sustainable forests. The Company will make reasonable enquiries as to the validity of Suppliers' environmental claims and check registration with relevant awards (products branded with eco-symbols).

The Company will instil in its Employees this culture and will endeavour to foster it with both Suppliers and Clients alike.

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### 3.9 REDUCING, REUSING, RECYCLING



The heightening awareness of "green" issues at corporate level has led to many Employers adopting Waste Recycling initiatives.

The Company recognises its duty to reuse or recycle materials, as required by the *Environmental Act 1995*. Therefore, the Company will endeavour to ensure that waste materials are collected, segregated and either reused or recycled. The Company appreciates that the reuse and recycling of waste materials is often economical, and hence desirable, due to:

- Lower costs for disposal and thus financial return.
- Conservation of resources.
- Reduction in damage to the environment.
- Reduced pollution.
- Commercial benefits derived from improved Employee morale/public image.
- Avoidance of legal proceedings.

The Company will instil in its Employees this culture and will endeavour to foster it with both Suppliers and Clients alike.

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### 3.10 STATUTORY NUISANCE



#### 3.10.1 Noise

Operations can involve the generation of noise that may constitute an adverse environmental impact. The Company takes reasonable precautions to reduce the noise generated by Work Equipment (WE) and processes (as required by the *Control of Noise at Work Regulations 2005*) for both Employees and the environment.

Where required the Company will liaise with the Client to introduce noise reduction techniques to reduce the levels of nuisance noise associated with the work. This could include, for example:

- Adopting work patterns to limit working during certain times of the day and week.
- Purchase plant and equipment that has low noise and vibration levels where reasonably practicable.
- Maintaining plant and equipment.
- Refrain from the use of portable radios.
- Turning off engines, plant and equipment when they are not in use and only using vehicle horns in emergencies.

### **3.10.2 Japanese Knotweed**

The Company is aware that the Japanese Knotweed is an invasive plant species that has the ability to damage infrastructure by penetrating foundations, walls, roads and drainage pipework.

In order to reduce the spread of the plant, the Company will:

- Not move any soil from within seven (7) metres of a Japanese Knotweed.
- Not track plant or vehicles over the affected areas.
- Ensure, where disposal of Japanese Knotweed is identified, that this is undertaken correctly and accompanied by a Waste Transfer Note (WTN).

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## **3.11 UNAUTHORISED RELEASES**



The Company has adopted a responsible attitude towards the control of pollution and the environment. The Company is well aware of the serious implications that unauthorised releases (such as spillages) can have on the environment and subsequently on the business. For example, a failure to adequately control unauthorised releases can not only cause serious harm to the environment but can also put Employees and others at risk, cause disruption and downtime reducing the Company's efficiency, leading to potentially large fines and clean-up costs.

The Company will ensure the awareness of all Employees in the necessary procedures, responses and actions required in the event of an unauthorised release. The Company will also ensure that Employees are provided with the appropriate level of instruction and training to enable them to carry out any necessary pollution prevention procedures.

The Company will follow a hierarchy of pollution prevention and control as identified below.

### **3.11.1 Prevention**

The Company will prevent spillages occurring as far as is possible by ensuring any Substances used during its undertakings are stored in suitable containers. Substance containers will be safely stored away from working areas when not required and lids, caps, etc. replaced and secured after use.

### **3.11.2 Watercourse Protection**

The Company will prevent, so far as is reasonably practicable, any spillage of liquid or release of solid material entering any drainage system during the Company's undertakings. Appropriate measures will be taken to protect drains that may lead directly into waterways and sewage plants during loading and unloading of bulk liquids or solids.

### **3.11.3 Containment**

The Company will, should the need arise, contain any spillages to prevent, so far as is reasonably practicable, any spillage spreading and causing further environmental damage. Responsive containment also ensures spillages are able to be cleaned up with the minimum amount of effort required, whilst minimising any environmental damage potential.

Suitable materials will be made available during Company operations to contain spillages. Materials can include absorbent sheets, booms, etc.

#### 3.11.4 Recovery

The Company will recover and properly dispose of, so far as is reasonably practicable, any spilt oils, fuels, etc. The Company will ensure that any 'recovered' Substances and contaminated materials generated in the clean-up process are recycled/re-used or properly disposed of in accordance with any Local Authority (LA) Guidelines.

#### 3.11.5 Clean Up

The Company will, should the need arise, ensure any spillages, so far as is reasonably practicable, are properly cleaned up. Suitable materials will be made available during Company operations to clean up any spillages. Materials can include absorbent sheets, granules, etc.

#### 3.11.6 Report and Cooperate

The Company will ensure reporting of larger spills to the appropriate governing body.

The Company will ensure any spilled liquids or materials that occur on a public highway that are considered to be dangerous or hazardous, and or causing traffic problems, are reported immediately to the Emergency Services. If the spillage fails to be controlled using appropriate watercourse protection, containment, etc. procedures, and enters a drain/waterway, the Company will ensure the incident is reported as soon as is reasonably practicable to the Environment Agency (EA).

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### 3.12 VEHICLES



The Company operates vehicles for the transportation of Employees, Work Equipment (WE) and materials. The Company recognises that all vehicles on the road today contribute to climate change because their engines burn fuel and therefore produce Carbon Dioxide (CO<sub>2</sub>).

The Company carefully considers fuel options when purchasing new vehicles but generally opts for vehicles powered by diesel engines producing less CO<sub>2</sub>. It is important for the proper and safe functioning of this transport that proper maintenance and care is given to these vehicles so as to not only protect Employees and the General Public but also to ensure that such vehicles don't cause any unnecessary negative impact on the environment.

The Company arrange for the regular maintenance and servicing of Company vehicles in line with the manufacturers recommendations. Each Employee has a duty to check the roadworthiness of the vehicle prior to embarking on any journey. This requirement is communicated through established means, including Tool Box Talks and Team Briefings.

The Company will make every attempt to reduce CO<sub>2</sub> emissions by reducing the workloads placed on the engines of Company vehicles. This will involve working closely with drivers of Company vehicles to ensure they adopt 'smart driving' techniques to reduce the amount of fuel burnt and so cut down on CO<sub>2</sub> emissions. Such techniques will include:

- Checking that tyres are correctly inflated to minimise resistance when the vehicle is moving. This also extends the life of the tyre.
- Checking that only those items required for the work are carried in vehicles to minimise weight.
- Ensuring that drivers obey the recognised speed limits and never exceed such limits.
- Encouraging appropriate gear selection (e.g.: changing up a gear when the rev counter reaches 2000rpm (diesel engines).
- Encouraging drivers to switch off engines when the vehicle is likely to be at a standstill for more than three (3) minutes or more.

Waste can be loosely defined as: "...any Substance or object...which the holder discards or intends or is required to discard."

The *Environmental Protection Act 1990* also gives a definition of Waste as:



*...any Substance or object...which the holder discards or intends or is required to discard.*

The *Environmental Protection Act 1990* also gives a definition of Waste as:



- i. *Any Substance which constitutes a scrap material or an effluent or other unwanted surplus Substance arising from the application of any process*
- ii. *Any Substance or article which requires to be disposed of as being broken, worn out, contaminated or otherwise spoiled*

The *Controlled Wastes Regulations 1992* (as amended) contain measures related to identifying the types of Waste that can legitimately be regarded as "Household", "Industrial" or "Commercial".

Operations undertaken by the Company involve the regular handling of waste materials.

There are two (2) main categories of Waste covered by Environmental Protection Legislation. These are:

- 1) Controlled Waste.
- 2) Hazardous Waste.

#### 3.13.1 Controlled Waste

The Company ensures that:

- Controlled Wastes are properly and clearly identified.
- Controlled Waste is only removed in accordance with the requirements of the Local Authority (LA).
- Waste Transfer Notes (WTNs) are completed and held for at least two (2) years.

All Waste that is not subject to more stringent legal requirements (i.e. all low-hazard waste) is considered to be Controlled Waste under the *Environmental Protection Act 1990*. This includes all industrial and commercial Waste or any similar Waste, regardless of the type of premises. It also includes Waste generated by a private household and Waste collected by the Local Authority (LA) and that collected by the Company by way of skip operations.

#### 3.13.2 Hazardous Waste

The *Hazardous Waste (England and Wales) Regulations 2005* requires that Waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular:

- Without risk to water, air, soil and plants and animals;
- Without causing a nuisance through noise or odours; and
- Without adversely affecting the countryside or places of special interest.

The Company is aware of the requirement that, where Hazardous Waste is produced at, or removed from, any premises other than exempt premises, the premises must be notified to the Environment Agency (EA).

### **3.13.3 Non-Hazardous Waste**

Non-hazardous wastes are those wastes not having hazardous properties. To determine whether a waste is Hazardous or not, the Company will reference the *List of Waste Regulations 2005*.

### **3.13.4 Hazardous Substances**

Hazardous Substances are often handled and used by Employees of the Company. The Company recognise that these Substances may present some considerable risks to the safety and health of Employees and can adversely affect the environment if released in an uncontrolled manner.

For this reason, the Company will ensure, where practicable, that exposure to Hazardous Substances is prevented or adequately controlled. This will be achieved with observance of the *Control of Substances Hazardous to Health Regulations 2002 (COSHH)*.

It is the aim of the Company that, wherever possible safer methodologies for the selection, use and disposal of Wastes are investigated so as to reduce harm to both people and the environment. This is a part of the Company's pollution prevention strategy.

The Company will undertake COSHH Assessments for those Hazardous Substances used during the Company's operations, with emphasis given to those substances used during the Company's on-site operations. If operations are being undertaken in areas where it is likely to cause problems, then consultation will be entered into to abate the impacts of the work and to allay any fears and concerns that may arise.

The Company believes in fostering a good community relationship in the areas in which its operations are undertaken and believe that this is a primary responsibility.

### **3.13.5 Waste Electrical and Electronic Equipment (WEEE)**

Due to the nature of its undertakings, the Company uses a variety of electrical appliances during the course of its day-to-day operations. Therefore, the Company recognises the need to comply with the *Waste Electrical and Electronic Equipment Regulations 2006 (WEEE Regulations)*. Many products contain electrical and electronic components, either for additional functionality or as peripheral parts.

The definition of EEE in the WEEE Regulations is intended to extend only to those products that are dependent on electric currents or electromagnetic fields to work properly, meaning that it is the primary power source.

When the electric current is switched off, the product cannot fulfil its main function. If electricity is used only for control or support functions, the product could be considered to be outside the scope of the WEEE Regulations.

The Company, therefore, aims to properly segregate and dispose of any Waste Electrical and Electronic Equipment to allow it to be properly treated and managed according to the requirements of the Directive to contribute towards the environmental performance of all those involved in the lifecycle of Electrical and Electronic Equipment.

The Company also notes the requirements of the *Restriction of Hazardous Substances in Electrical and Electronic Equipment (ROHS) Regulations 2006* which aims to reduce the waste management problems linked to Substances likely to pose risks to health and the environment.

### **3.13.6 Asbestos Containing Materials (ACMs)**

The Company Employees may come into contact with Asbestos and/or Asbestos Containing Materials (ACMs) during its on-site operations. Should Employees suspect that Asbestos and/or ACMs have been discovered then they will inform the Director with Responsibility for Safety, Health and the Environment with immediate effect.

The Company takes all necessary precautions to ensure that exposure to ACMs is reduced as far as is reasonably practicable. Before undertaking any work on site, the Company ensures that the accurate identification of Asbestos is undertaken in accordance with the requirements of the *Control of Asbestos Regulations 2012* – this is requested in a form of an Asbestos Survey and accompanying Register.

The Company ensures that any sampling and identification analysis as part of the Survey has only been carried out by a nominated and competent person in compliance with ISO 17025. ISO 17025 is the European Standard required for the competence of testing and calibration of laboratories.

## 4 CHECK – MONITOR PERFORMANCE

### 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.



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### 4.1 ENVIRONMENTAL MONITORING



Blade Wind Services Ltd will use 'active' and 'reactive' monitoring procedures to measure the effectiveness of the Policy. This may include the observance of standards and procedures, feedback from Employees and as a result of environmental incidents.

The Company will assess the performance of the Policy on a regular basis and as required. For example, as a result of the findings made during the monitoring of the Policy.

## 5 ACT – REVIEW AND AUDIT

### Review your performance

- Learn from accidents and incidents, ill-health data, errors and relevant experience, other organisations, etc.
- Revisit plans, policy documents and risk assessments to see if they need updating.

### Take action on lessons learned, including those from audit and inspection reports



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### 5.1 REVIEW



The organisation learns from all relevant experience and applies the lessons. There is a systematic review of performance based on data from monitoring and from independent audits of the whole Health and Safety Management System. These form the basis of self-regulation and of complying with Sections 2 to 6 of the *Health and Safety at Work etc. Act 1974* and other relevant statutory provisions.

There is a strong commitment to continuous improvement involving the constant development of policies, systems and techniques of risk control. Performance is assessed by:

- Internal reference to key performance indicators.
- External comparison with the performance of business competitors and good practice, irrespective of employment sector.

Performance is also often recorded in annual reports.

It is the duty of the Director with Responsibility for Health, Safety and Environment to arrange for the Policy to be reviewed as often as appropriate and as a minimum at least once a year. Circumstances, which may cause the Policy to be reviewed, could include:

- New work practices, which can cause a change in the nature of Company operations and can, lead to changes in training requirements.
- New hazards in the workplace that require addition to the Risk Assessment and control measures identified. This in turn, may lead to additional responsibilities and duties of Employees being identified.
- Working experience that requires addition to the old Policy.
- New Legislation requirements, which require addition to the Policy and may require the identification of further duties within the Company.
- Company re-organisation that can lead to the redefinition of duties and responsibilities.

Monitoring of the Policy is the responsibility of the Director with Responsibility for Health, Safety and Environment.

Observation of the workplace, feedback from Employees, noting any increase in accidents, sickness, etc. will be used by the Director with Responsibility for Health, Safety and Environment as important indicators to monitor the success of the Environment and Sustainability Policy.

Each Employee is made aware of the location of the Company Environment and Sustainability Policy. Each Employee is given a suitable timescale in which to read the Environment and Sustainability Policy in order to fully understand the duties and arrangements that are contained in it.

Company Management is available to answer queries or issues that any Employee may have regarding its contents. Where clarification is required then the Company may also enlist the services of Health, Safety and Environment Advisors to ensure that the query can be answered in the most effective way that can be most easily understood.

After reading the Environment and Sustainability Policy and ensuring that he/she is satisfied that they understand the contents, each member of staff will sign and date the "Declarations".

When amendments are made to the Environment and Sustainability Policy Employees are informed of the change in issue status of the document and are given time to understand the changes made and any implications arising out of them. Subsequently Employees are required, once again, to sign and date the "Declarations".

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## 5.2 AUDIT



All control systems tend to deteriorate over time or to become obsolete as a result of change. Auditing supports monitoring by providing managers with information on how effectively plans and the components of the Health and Safety Management System are being implemented. It should also provide a check on the adequacy and effectiveness of the management arrangements and Risk Control Systems (RCS). Auditing is an essential element of an Environmental Management System and is no substitute for the other essential parts of the system.

Blade Wind Services Ltd understands that systems need to be managed on a day-to-day basis and that a regular audit is vital to ensure that this can be maintained. The aims of auditing are to establish that:

- Appropriate management arrangements are in place.
- Adequate risk control systems exist, are implemented, and consistent with the hazard profile of the organisation.
- Appropriate workplace precautions are in place.

In conjunction with our Health, Safety and Environment Advisors (MD Safety Management) an annual documents audit is undertaken to ensure that all documentation comprising the Environment Management system is reviewed and updated to reflect changes in the Company as well as Health, Safety and Environmental Legislation and also industry good practices.

## APPENDIX 1 USEFUL INFORMATION

<p><i>Environment Agency (EA)</i> <i>North West Regional Office:</i></p>		<p><i>PO Box 12</i> <i>Richard Fairclough House</i> <i>Knutsford Road</i> <i>Latchford</i> <i>Warrington</i> <i>Cheshire</i> <i>WA4 1HT</i></p>
<p><i>EA</i> <i>North West Regional Office</i></p>		<p><i>08708 506506 (Mon-Fri 8am – 6pm)</i></p>
<p><i>EA</i> <i>Incident Hotline</i></p>		<p><i>0800 807060 (Freephone - 24 Hour)</i></p>
<p><i>EA</i> <i>Hazardous Waste Registration</i></p>		<p><i>08708 502 858 (Mon-Fri 9am – 5pm)</i>  <i>www.environment-agency.gov.uk</i> <i>enquiries@environment-agency.gov.uk</i></p>
<p><i>MD Safety Management:</i></p>		<p><i>www.mdsm.org.uk</i> <i>(0844) 335 1499</i> <i>info@mdsm.org.uk</i></p>
<p><i>Department for Environment Food and Rural Affairs Website:</i></p>		<p><i>www.defra.gov.uk</i></p>
<p><i>Carbon Trust</i></p>		<p><i>www.carbontrust.co.uk</i></p>
<p><i>Water UK</i></p>		<p><i>www.water.org.uk</i></p>
<p><i>Energy Saving Trust</i></p>		<p><i>www.energysavingtrust.org.uk</i></p>

## APPENDIX 2 ENVIRONMENTAL LEGISLATION

Compliance with environmental legislation is a basic minimum requirement for any responsible organisation.

The Company is committed to ensuring on-going compliance with the ever-changing requirements of Legislation. The Company is strongly aware that it is important that a register of environmental legislation applicable to the Company is identified and kept up to date.

The Company uses the Environment Agency (EA) website list of applicable Legislation as the basis of its Register:



[www.environment-agency.gov.uk/netregs/legislation/current/63594.aspx](http://www.environment-agency.gov.uk/netregs/legislation/current/63594.aspx)

The lists on the HSE website are linked to the Government's official legislation website:





**working with**



**Policies Assessments**  
**Training Consultancy**

[www.mdsm.org.uk](http://www.mdsm.org.uk)

[info@mdsm.org](mailto:info@mdsm.org)

**0844 335 1499**



*MD Safety Management Limited is a Health and Safety Consultancy with over 30 years' experience in Nuclear, Chemical, Construction, Retail, Leisure and Environmental Sectors we provide tailored and cost-effective services to our varied Client-base.*

*MD Safety Management Limited is working with **Blade Wind Services Ltd** in order to implement a Safety Management System and ensure that this is monitored and updated to comply with Health and Safety and associated Legislation.*

