

T.W.R. Commercial Limited

ENVIROMENTAL POLICY AND HANDBOOK

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Introduction

The environmental handbook has been written to ensure best environmental practice. 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.

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.

The handbook should be viewed as living document and therefore changes frequently due to changes in relevant law and regulations.

Environmental Policy

T.W.R. Commercial Limited recognises that environmental issues are of fundamental importance to a successful and responsible business strategy.

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:

1. To ensure that operations comply with current legislative and regulatory requirements.
2. Strive to design and develop products, which have the minimum environment impacts during our manufacture, use and subsequent disposal.
3. Reduce the amount of waste produced and dispose of any responsibly.
4. Reduce the consumption of raw materials, water and fuels.
5. Recycle materials wherever possible and practical.
6. Educate our workforce in relevant aspects of environmental best practices and maintain a safe working environment.
7. Communicate our environmental policy to all levels of the workforce and sites of the company.
8. Review our environmental policy on a regular basis.

T.W.R. Commercial Limited 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 products and services.

Position	Managing Director
Print name	Mr Terry Richardson
Date	14/01/10

SECTION 1

Employee Responsibilities for Environmental Issues

Employees have a responsibility to:

Use appropriate pollution control equipment where it is provided.

Avoid improvisation in any form that may create a risk to the environment.

Maintain all tools and equipment in good condition and report any defects to their supervisor.

Attend and participate as requested any training course/session designed to further the interests of environmental obligations.

Ensure they are aware of the correct disposal routes for solid and liquid wastes including:

- **Paper and Card Packaging** 6
- **Glass** 7
- **Upvc Frames** 7
- **Aluminium** 7
- **General Waste**

Use all natural resources efficiently.

Observe fire evacuation procedure and learn position of all equipment and exit routes.

Observe and be familiar with emergency procedures for pollution incidents.

SECTION 2

Company Responsibilities for Environmental Issues

ENVIRONMENTAL ISSUES	RESPONSIBILITY
Delivery/Storage of Products At office premises At manufacturing premises	Paul Morrison
Use of Material/Chemical Hazards Small spillage (solids and liquids) Large spillage's (solids and liquids)	Paul Morrison Craig Buist
Operation of Plant and Technical Equipment	Paul Morrison
Disposal of Waste General Overall responsibility	Paul Morrison Terry Richardson M.D.
Transport	Paul Morrison
Energy Use	Paul Morrison
Water Use	Paul Morrison
Office Issues and Facilities	Craig Buist
Control of Noise	Paul Morrison
Removal of Litter General Overall responsibility	Paul Morrison Terry Richardson M.D.
Environmental Awareness and Staff Training	Paul Morrison
House Keeping	Paul Morrison and all employees
Record Keeping and Maintenance of Handbook and its Contents	Paul Morrison

SECTION 3

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:

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:

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

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.

2. 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.

3. 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).

3.1.2

Guidance on the Regulation of Waste

BOX A

WHO ARE THE AUTHORISED PERSONS?

Council waste collectors: For most shops and small offices the council will collect your waste. In this case you don't have to do any more checking. You will have to do some paperwork through – this is explained in box B.

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.

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.

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.

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.

In Scotland only, Council Waste Disposers: Check with the council that its resolution (the equivalent of a licence) covers your type of waste.

BOX B

FILLING IN PAPERWORK

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.

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).

THE TRANSFER NOTE

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

- What sort of containers it is in
- The time and date the waste was transferred
- Where the transfer took place
- The names and addresses of both parties
- Details of which category of authorised person each one is
- 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
- If either or both of the parties has a waste licence, the licence number and the name of the council that issued it
- Reasons for any exemption from the requirement to register to have a license.

THE WRITTEN DESCRIPTION

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

KEEPING THE PAPERS

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.

SECTION 4

Environmental Working Practices

4.1 Delivery/Storage of Products

Where possible efforts shall be made to purchase and store materials in bulk.

Where feasible products and consumables shall be directly delivered to site.

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.

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.

4.2 Plant and Technical Equipment

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 sewing machines 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).

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.

Pollution Events

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. 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.

For larger spillage's staff should contact their supervisor for further instruction.

Paperwork and records for compliance with the Duty of Care etc shall be maintained by Craig Buist

4.2.1 Abnormal Operating Conditions

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.

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.

Staff shall exercise due care and attention in the vicinity of machine hazards such as moving parts, high temperatures, areas where hazardous chemicals are used.

Where relevant all safety guards, procedures and environmental controls shall be used at all times. Failure of such systems should be reported to the supervisor. Staff shall be familiar with the procedures for the start up, shut down, and abnormal operating conditions of all pieces of plant.

A regular programme of preventative maintenance is in place for key plant and equipment. Spares and consumables are available from a supervisor.

4.3 Waste

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.

Staff shall avoid wasting water by using a plug or a bowl for washing and turn taps off once finished.

The use of grids/drains – Under no circumstances shall any material be tipped down grids 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.

4.3.1 Recycling Operational Controls

Paper and cardboard – Cardboard, paper, bubble wrap and polystyrene is currently separated and removed on a monthly basis to be recycled.

Aim to Recycle Limited

Aim to Recycle can help you recycle:

Paper and Card - from newspaper to cardboard cartons

Plastics - all types including shrink wrap, bubble wrap, expanded polystyrene, plastic bottles and manufacturing off cuts

Wood - such as pallets, crates, cable drums, waste wood from construction sites

THE DUTY OF CARE

What is it ?

Any company that produces waste is legally and socially responsible for its disposal under the Duty of Care required by the Environment Protection Act (1990). This requires you to take all reasonable steps to ensure that waste is handled legally. This means that it can only be transferred to an authorised person together with a waste transfer note.

Your Responsibility

If you produce waste you have a legal and social responsibility for its disposal. Businesses wishing to dispose of waste must comply with the legal requirements covered by the Duty of Care. Following the Duty of Care will ensure your business stays within the law and does not harm the environment.

Why comply?

- Your business avoids prosecution and the associated poor public image
- It improves both your company's business and environmental performance
- Failure to comply is a criminal offence and the business and its directors could face prosecution.

Successful prosecution can result in an unlimited fine

How to comply

- All waste collected must be carried by waste carriers registered with the Environment Agency
- You have a duty to check the carrier's registration
- All waste must be taken to an authorised facility - by the year 2006 recyclable material will be precluded from entering landfill
- A waste transfer note must be in force for every transfer of waste
- You must retain a copy of all waste transfer notes for at least two years

Upvc Profile – machined off-cuts shall be placed in off-cut bins supplied by Dekura a Upvc recycling company, they collect these weekly.

Upvc Windows – that has been taken out from domestic and commercial jobs, shall be broken up safely and placed in recycling bins supplied by Dekura.

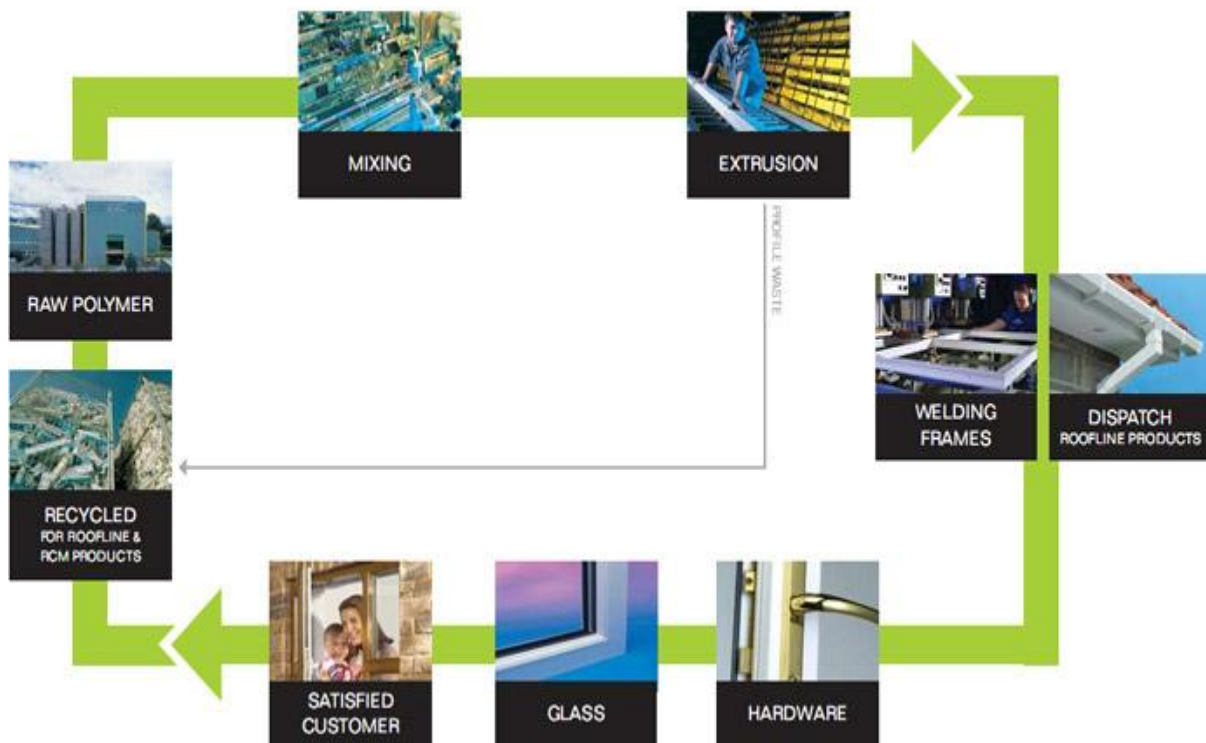
Dekura

Our Green Commitment

We're an organisation that's strongly dedicated to good environmental practice. Dekura is a signatory to Vinyl 2010, which is the environmental charter created by the European plastics industry — and we are supporting a wide range of community and industry recycling initiatives.

Our recycling chain, from collection to reprocessing, is designed for maximum environmental protection. Emissions from our plant are negligible and our innovative processes are extremely energy efficient, underlining the advantages of recycling PVC-U.

We can also enhance your PR and marketing. As a Dekura customer, you get to share our environmental credentials by displaying our exclusive “green compliant” mark. It's another compelling business reason to use our services.



Glass – 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.

Northern Cullet Limited is part of the Potters Europe Group who are the Worlds foremost manufacturers of Glass Spheres.

Glass Grains For Industrial Applications

Whilst originally conceived as the glass raw material division of Potters Europe, Northern Cullet Ltd itself has now become a leading supplier of glass grains, utilizing the expertise in particle sizing developed by its parent company over many years.

The process of attaining the perfect bead

The perfect glass bead every time is the goal of the Potters' glass bead manufacturing process. The perfect glass bead - an exact sphere, pure and clear - offers strength in its perfect roundness, and optimum reflective qualities in its purity and clarity.

The manufacture of glass beads is different from most other glass, mainly because there is no molten batch. Potters uses soda lime cullet, which is ground and sorted into basic sizes before introducing it to the furnace. The beads are actually formed in a hot furnace atmosphere.

Pre-sized ground cullet is gravity-fed into the proprietary Potters'-designed, gas-fired furnace. The intense heat melts the ground glass while it is suspended in the burning gas, forming a sphere. The sphere is carried upward from the heat zone by the products of combustion that form a natural draught. Immediately upon exiting the heat zone, the spheres enter a large cooling zone where they are collected and transferred for further sizing, grading, coating and packaging.

Quality control is critical to make consistent glass bead batches. It is the attention to the development of the manufacturing process combined with quality control that has kept Potters in the forefront of the glass bead market, with the ability to deliver quality, consistently sized beads.



Refuse collection

Public health has been a principle factor in human society since Roman times, when Britain's population began its steady expansion. The Industrial Revolution instigated urbanisation on a mass scale and with that came the complications of hygienic living conditions. This was largely resolved through the modernisation of sewerage systems and the collection of waste away from living areas.

Collection of refuse from households and business premises is now so well established that for the most part it goes unnoticed.

At SITA UK, we collect all types of refuse, using a variety of containers and refuse vehicles (RCVs). This waste is taken for treatment (recycling and sorting) before the safe disposal of any residual waste.

Our collection services

- Domestic (also known as household or municipal) waste - Collection of waste from people's homes on behalf of their local authority.
- Industrial and Commercial (also known as trade or dry) waste - Collection of all types of dry waste materials from business premises.
- Hazardous (also known as special or liquid) waste - Safe collection of waste types that are deemed hazardous to human health.



Aluminium Recycling

The aluminium economy is a circular economy. For most aluminium products, the metal is not actually consumed during the product's lifetime, but simply used with the potential to be used again through recycling. Aluminium can be recycled again and again without any loss of its inherent properties, since its atomic structure is not altered during melting. Therefore, the life cycle of an aluminium product is not the traditional "cradle-to-grave" sequence, but rather a renewable "cradle-to-cradle".

Energy saving

The high value of aluminium scrap is a key incentive and major economic impetus for recycling, independent of any legislative or political initiatives to encourage recycling. Aluminium scrap has considerable market value because most of the energy required for the production of primary aluminium is embodied in the metal itself and, consequently, in the scrap. Therefore, the energy needed to melt aluminium scrap is only a fraction of that required for primary aluminium production. Recycling of aluminium products needs only 5% of the energy needed for primary aluminium production.



Greenhouse gas reductions

In addition, recycling of aluminium products only emits 5% of the greenhouse gas emitted in primary aluminium production. Recycling of scrap from used products ("old scrap") saved over 70 million tonnes of greenhouse gas emissions worldwide in 2005. Since its inception, the recycling of old scrap has already avoided over one billion metric tonnes of CO₂ emissions.



A growing economy

Recycling is a major aspect of continued aluminium use, as more than a third of all the aluminium currently produced globally originates from recycled metal; a trend which is on the increase. The aluminium recycling industry has effectively tripled its output from 5 million tonnes in 1980 to over 16 million tonnes in 2006. During the same time primary metal use has grown from 15 to 30 million tonnes. The proportion of recycled aluminium to the global demand for the metal has grown from less than 20% in 1950 to approximately 33% in 2006. Of an estimated total of over 700 million tonnes of aluminium produced in the world since commercial manufacture began in the 1880s, about three quarters of that total is still in productive use with credit, at least in part, to the recycling industry.

The aluminium recycling industry recycles all the aluminium scrap it can obtain from end-of-life products and aluminium by-products. The rate at which end-of-life aluminium is recycled varies depending on the product sector, scrap processing technology and on society's commitment to collect aluminium containing products at end-of-life. Each application sector requires its own recycling solutions and the industry supports initiatives that seek to optimise the recycling rate.

Improving the overall recycling rate is an essential element in the pursuit of sustainable development.

Staff shall follow good practice of energy consumption. Specifically staff shall:

- Switch off laminator when it is not in use.
- Switch off welders when not in use for periods of longer than 3 hour.
- Switch off lights when not in use.
- Switch off photocopiers, computers, printers and other electrically powered items when not needed or when leaving office for more than 1 hour.
- Switch off the heating cabinet when not in use.
- Save photocopying and printing until there are several documents that can be copied or printed together.
- Avoid opening windows or leaving doors propped open when the heating is on.

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.

Full and empty containers shall be returned to their correct locations.

Consumable products shall be used sensibly and supervisors shall keep a stock of essential spares and consumables.

Where possible staff responsible for purchasing shall:

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

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

An annual check shall be made to ensure that the company is aware of any changes to the legislation to which they adhere.

Staff shall be informed of changes in legislation that affects their working practices. Additional training shall be provided where necessary.

New staff shall be made aware of the company's environmental policy.

SECTION 5

Visitors and Subcontractors Rules

Visitors and Subcontractors shall:

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

SECTION 6

Emergency Procedures and Telephone Contacts

The following numbers may be useful for information and advice:

Environmental and Energy Helpline

(Provide information and advice on environmental and energy issues)

General helpline (0800) 585 794

Health and Safety Executive

(Provide general advice and guidance on safety aspects)

General enquiries **0845 345 0055**.

Arden House
Regent Centre
Regent Farm Road
Gosforth
NEWCASTLE-UPON-TYNE
NE3 3JN
Fax: 0191 202 6300

Environment Agency

(Provide advice and guidance on pollution, discharges to surface waters and other watercourses)

Northumbria Area Office
Tyneside House
Skinnerburn Road
Newcastle Buisnes Park
Newcastle upon Tyne
NE4 7AR
Tel: 0191 203 4000
Fax: 0191 203 4004
24 hour emergency hotline (0800) 80 70 60

SECTION 8

Useful Environmental Web Site Addresses

DETR (Department of Environment, Transport and Regions)	http://www.detr.gov.uk/
DTI (Department of Trade and Industry)	http://www.dti.gov.uk
Energy Efficiency (ETSU) includes best practice programme	http://www.etsu.com
Environment Agency	http://www.environmental-agency.gov.uk
Environment Agency	http://www.environmental-agency.gov.uk/epns/netregs.html
Health and Safety Executive	http://www.open.gov.uk/hse/hsehome.htm

Health Safety and Environmental Training Record Checklist

Employee Name:
 Job/Position:
 Division/Section:
 Date commenced employment:

Fire Safety	Comments
Know where alarm point is and how to sound it or know procedure for notification of fire.	
Be able to identify evacuation alarm sound and respond appropriately or have a procedure for evacuation in the event of a fire.	
Be able to show evacuation route and assembly point (and any alternatives)	
Show where extinguishers are located in workplace.	
Know when to use different types of extinguisher (water/gas/powder/fire blanket).	
Know how to use extinguishers and what to do after use (e.g. replace extinguisher – who is responsible – link to staff responsibilities in log book).	
Be aware of relevant precautions to reduce risk of fire (e.g. correct handling of flammable liquids etc.).	
Know where smoking is/is not allowed (e.g. consider fire risk, secondary smoking, and disposal of cigarette butts).	
Accidents	
Explain reporting procedure for injuries, accidents and near misses and reasons for reporting.	
Know location of First Aid box or personnel qualified in First Aid.	
Explain action to be taken in event of serious injury to self or another.	
Uniforms/Overalls/Protective Clothing	
Explain issue, care and cleaning.	
Know what protective clothing should be worn, how to maintain it and procedure for replacement.	
Electrical	
Demonstrate checks required before using electrical equipment.	
Explain action if faults are found (staff responsibility – link to log book)	
Material/Chemical Hazards	
Be aware of materials and objects that are difficult or dangerous to handle.	
Demonstrate safe handling methods for corrosive liquids, flammable gases, solvents etc.	
Explain action in the event of spillage.	
Show waste/rubbish disposal system and explain hazards.	
Machine Equipment Hazards	
Demonstrate correct methods of use and appropriate use of guards etc.	
Demonstrate start up, shut down and abnormal operating shutdown procedure.	
Be aware of safety representative and procedures for action if identify a hazard.	
Housekeeping and Access	
Be able to explain reasons for maintaining clear access routes (avoid tripping hazards, obstructing gangways, doorways, fire exits etc.).	
Internal Transport	
Explain use and hazards.	
Explain parking rules for employer and visitor vehicles.	
Explain site traffic system.	
Safety Policy and Staff Welfare	
Explain employer and employee responsibility (include notification to supervisor of any medical conditions which could effect employees safety or safety of others).	
Be aware of issues such as eyestrain, repetitive strain injury.	
Demonstrate correct lifting and handling methods.	
Know what to do when unfit for work. Be aware of whether absence is paid/unpaid.	

Health Safety and Environmental Training Record

Employee Name:

Job/Position:

Division/Section:

Date Commenced employment:

Issues	Instruction By	Signature of Employee	Date
Fire Safety			
Accidents			
Uniforms/Overalls/Protective Clothing			
Electrical			
Material/Chemical Hazards			
Machine Equipment Hazards			
Housekeeping and Access			
Internal Transport			
Safety Policy and Staff Welfare			