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Health, Safety & Environmental Management System			

# LINDUM GROUP

## Environmental Policy & System

### 2019-2020





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### Environmental Policy - Amendments

Date	Reason for Change	Comments
February 2017	Organisational chart updated.	
February 2018	Policy reviewed and revised. Organisational chart updated.	
July 2018	Organisational chart updated.	
Nov 2018	Review.	
Jan 2019	Organisation chart updated.	

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### Environmental Policy Statement for Lindum Group Ltd

As a Group, we are committed to a positive and responsible approach to environmental matters throughout all our business activities. In doing so we will:

- Comply with all applicable environmental legislation, relevant Codes of Practice and fulfil our compliance obligations as appropriate and actively promote positive action through our supply chain and in the wider community
- Assess the environmental consequences of our activities as developers, contractors, subcontractors and employers, and ensure that these activities are controlled and, wherever possible, monitored carefully
- Actively seek to reduce any adverse environmental effect of our activities through the use of environmentally friendly working practices and materials, wherever cost effective, and by consultation with our customers, suppliers and subcontractors.
- Regularly review operational procedures, plant, and technology and material specifications and, where practical, employ those which are considered to have the least environmental effect. The reviews to take into account suitability for use and the cost effectiveness of alternative proposals.
- Wherever financially and technically viable, support employee initiatives which reduce the effect of the company's operations on the environment.
- As a responsible member of the construction industry, liaise on a regular basis with all parties that may be affected by our activities, and take their environmental concerns and suggestions into account.
- Maintain contact with the relevant regulatory bodies and authorities, to ensure that we are aware of [& implement] the latest legislation and consider proposals for the future.
- Prevent pollution due to our business activities by careful planning and implementation of appropriate methodology.
- Make a commitment to continual improvement of the Environmental Management System to enhance environmental performance.

In accordance with our aim to be recognised as an organisation that has a conscientious and intelligent approach to environmental matters, this policy will be updated as and when necessary to reflect social, operational and legislative changes and, consistent with our policy of promoting best practice.

Signed:

D C Chambers  
Chairman  
Date: 10/01/19





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## Introduction

Our primary aim is to develop and maintain an environmentally responsible and proactive culture within Lindum Group and our suppliers and subcontractors. We will share Environmental information if we are requested to do so, otherwise our Environmental information will not be communicated externally.

Caring for the environment is a priority area and we aim to have zero environmental incidents on our projects.

The purpose of this document is to provide information to all Lindum Group Employees on the company's organisation and arrangements for environmental management to ensure our impacts are minimised and to set out management and employees responsibilities to achieve this.

This document has been prepared to define the way in which Lindum Group intends to manage environmental issues, which may be summarised as follow;

- To establish an Environmental Policy that is appropriate to Lindum Group.
- To identify the legislative and regulatory requirements relevant to Lindum Groups environmental compliance.
- To identify the environmental aspects (risks) arising from Lindum Group's past, existing or planned activities.
- To determine the environmental significance of these aspects and introduce control measures to manage environmental impacts.
- To identify priorities and set appropriate environmental objectives and targets.
- To establish a structure, procedures and programme to implement the policy and achieve the objectives and targets.
- To define responsibilities and provide resources for planning, control, monitoring, corrective action, auditing and review activities to ensure both that the policy is complied with and that the Environmental Management System remains appropriate.

Lindum's system is ISO14001 compliant. This system is fully documented with a clear audit trail and record of implementation. The EMS covers construction and related activity including repairs, servicing, maintenance, alteration and new build projects.

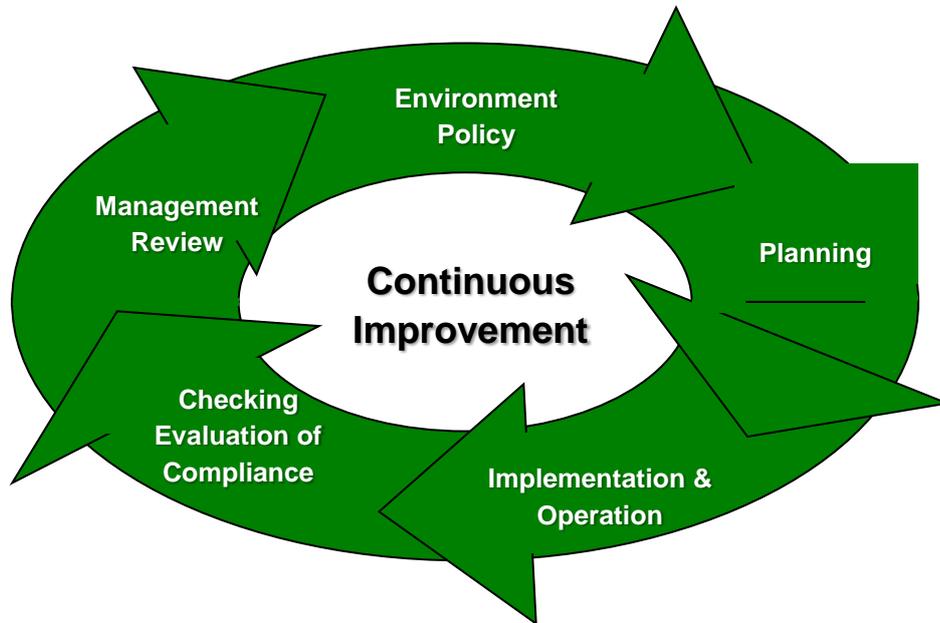
We have adopted a risk assessment based approach to environmental management.

Lindum maintains sustainable development using a Continuous Improvement Cycle.

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## Interaction of the processes



### Management review and continual improvement

Maintaining a high level of awareness of current best practice and the ability to apply modern methods of operation is a priority requirement. New working methods such as materials, technologies and standards are researched. To utilise current best practice, training needs are regularly assessed along with support requirements for suppliers.

### Duties & Responsibilities

The Duties of the member of the Executive Board with responsibility for the Environmental Policy are:

- To ensure a Group Environmental Statement and Policy are prepared and implemented properly and in full.
  - To ensure that there is sufficient environmental advice and awareness at all levels of Lindum Group.
  - To inform the Lindum Group Board of Directors of any major environmental issues affecting or likely to affect Lindum Group and to promote a pro-active approach on such issues.
  - To set a good personal example at all times.
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**Divisional Directors and Other Senior Managers inc. Construction Managers, Quantity Surveyors, Design Coordinators, Buyers**

Divisional Directors and senior staff should implement the policy by: -

- Ensuring environmental issues are given due regard at tender stage and that such issues are identified so that an effective control strategy can be developed.
- Ensuring staff and contractors at all levels receive appropriate training to enable them to understand environmental issues.
- Monitoring environmental performance through on site meetings and responding to actual site conditions observed when on routine site inspections.
- When holding meetings with employees, ensure environmental issues are discussed, and receive comments and suggestions on which the Group's performance can be improved.
- Setting a good example and having adequate knowledge of environmental legislation.

**Waste and Recycling Manager**

The person responsible for Waste and Recycling will: -

- Have adequate knowledge of environmental legislation and waste management procedures.
- Ensure that all necessary registers and records are maintained and the conditions of our licence are complied with.
- Advise internal and external clients with regard to environmental legislation.
- Ensure that correctly completed documentation accompanies the waste.
- Verify the description of the waste they receive.
- Ensure that Waste Transfer Notes are archived and kept for a period of two years and Hazardous Waste Consignment Notes are kept for three years.

**The Site Manager (and other persons in control of the site)**

The Site Manager shall: -

- Understand the Company's Environmental Policy and ensure it is brought to the attention of all employees and sub-contractors.
- Have adequate knowledge of legal requirements and good working practices.
- Ensuring that all necessary registers and records are maintained.
- Ensure that adequate arrangements are made with regards to waste procedures to minimise waste and ensure that waste is correctly classified and handled.
- In planning the site layout and work give due regard to environmental issues identified in the pre-construction information.
- Ensure any environmental incident is reported in accordance with Lindum Group's procedure.
- Set a good personal example at all times.

**Duties of Facility Managers and Office Supervisors**

The Facility Managers and Office Supervisors shall: -

- Understand the Company's Environmental Policy and ensure it is brought to the attention of all employees, particularly new employees through induction talks.
  - Have adequate knowledge of environmental requirements and practices as they relate to work procedures and maintenance carried out in Lindum Group buildings.
  - Ensure any environmental incident is reported in accordance with Lindum Group's procedures.
  - Ensure that activities are not adversely affecting the environment.
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- Make periodic inspections of the facility with a view to identifying hazards, bad practices and non-conformities.
- Set a good personal example at all times.

#### **Duties of Site Operatives**

- Cooperate with Managers on environmental matters.
- Not interfere with anything provided to protect the environment.
- Report all environmental concerns to the appropriate person.
- Seek further advice from Line Managers, Health, Safety and Environmental Advisors.
- Ensure that environmental issues are properly considered for persons under their direct control.
- Contribute in reducing incidents and waste as an integral part of the business process.

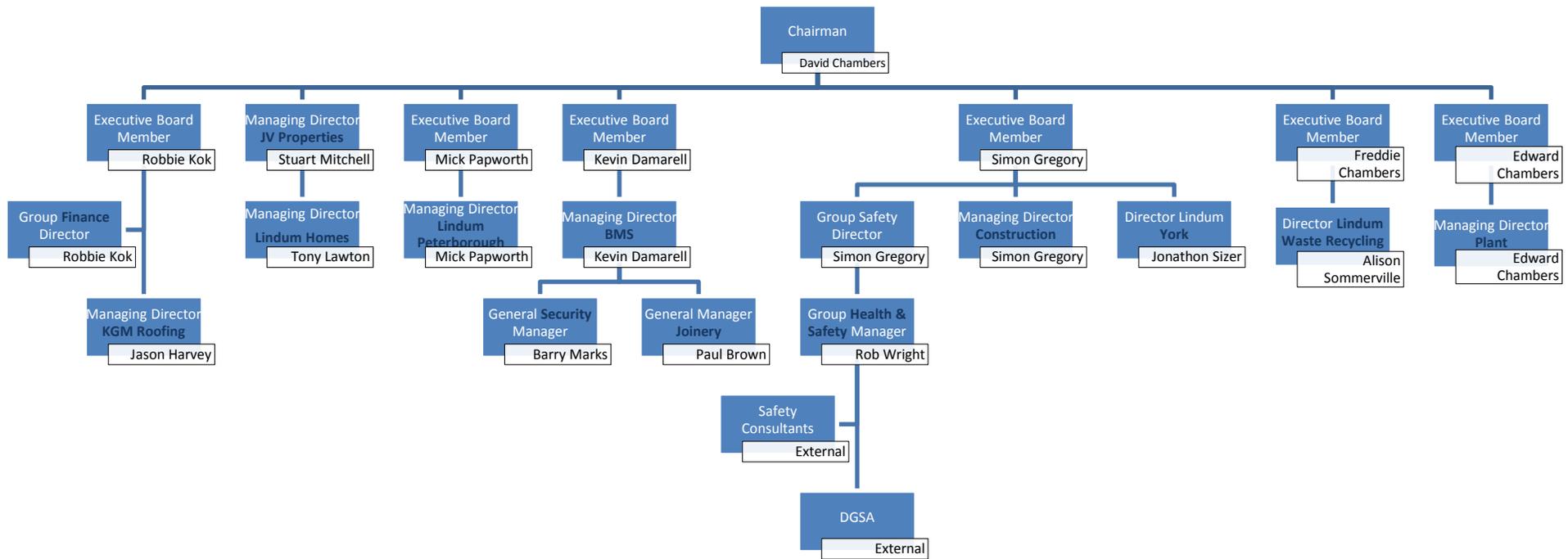
#### **Duties of all Lindum Employees**

Each and every employee has a role to play in ensuring that Lindum Group operates in a responsible and environmentally friendly manner and is responsible for bringing to the attention of line managers any discrepancies or improvements that may be possible.

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## **Planning**

### **Environmental Aspects and Impacts Register**

To mitigate negative environmental risks and promote positive environmental impacts our environmental managements system is based on the requirement to identify and evaluate environmental risks and ensure that appropriate controls are implemented.

As soon as is practical within each project (ideally at tender stage) the environmental aspects and impacts register will be completed by the Construction Manager.

At the pre tender stage of a project the following environmental aspects should be considered:

Land hazards	Contaminated ground, silt or other run offs, dust.
Emissions into the atmosphere	Smoke, fumes, vapours, mists, noise, light
Storage	Fuel, other fluids, plant
Natural environment	Assess impact on flora, fauna
Living environment	Cleanliness, light, noise, dirt and dust, vibration, traffic movements
Specified harmful substances	VOCs, hydro carbons, HCFs, solvent based paints, varnishes and adhesives.
Waste	Hazardous

NB An environmental aspect is an element of an organisation's activities, products or services that can interact with the environment.

At the start of the project, the team will evaluate both non-specific (generic construction) and specific (site/development specific) activities. The potential impact for each element will be identified, along with, relevant controls required to be in place. In addition, all specific activities will have their relative severity, probability and legislative impact numerically rated. Each assessment will be recorded on a Lindum Group Environmental Aspects and Impacts Register, a copy of which is retained on site.

Key areas of environmental impact which are given due consideration on each site are; CO<sub>2</sub> Emissions, Water Consumption, Dust Nuisance, Potential Drainage Contamination as well as Noise and Light Pollution. In addition to these specific impacts the site is evaluated for any unique impacts that may arise from the locality or any special processes that are required to complete the build process.

Project specific evaluations are carried out in conjunction with the creation of the Site Waste Management Plan. The Site Manager and Construction Manager would be assisted in these assessments by our in-house Waste and Recycling Manager.

### **Legal Requirements**

To ensure we remain compliant with environmental legislation and the requirements of our clients, we have an established procedure for monitoring and maintenance of Environmental legislation.

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This procedure ensures relevant requirements are identified through a register of legislation, with changes monitored, communicated and implemented.

Periodic evaluations are undertaken and recorded by assessing trends from incidents, Health, Safety and Environmental Inspections, near miss reports and investigations carried out by internal auditors. Legal requirements are incorporated into the risk evaluation process to ensure those environmental aspects with legislative controls are considered.

### Objectives and Targets

To ensure improvement in our environmental performance we have established a series of environment objectives, measures and targets which are set and reviewed annually. They are monitored on a monthly basis and reported on as part of the Safety and Environmental reporting procedure.

- *Ensure 100% of all non-hazardous waste streams are recycled – achieving zero to land fill by 2019.*
- *Obtain a baseline figure from data contained within the site waste management plans by 2019.*
- *All timber products on site to be from legal sustainable sources by 2020.*

Other performance indicators such as Recycle rates are monitored by LWR.

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## **Implementation & Operation**

### **Waste Removal/Recycling**

Lindum’s own Waste Recovery Division (LWR) is responsible for managing the appropriate collection and removal of all site waste. The division ensures the appropriate mix of containers is provided to securely contain pre-segregated material on site prior to onward transmission to the most appropriate waste transfer station for further segregation and reprocessing. The division has established a network of other transfer stations that can provide similar facilities across the country to reduce CO<sub>2</sub> emissions generated by waste collection to a minimum.

### **Waste Minimisation**

Site Managers in conjunction with Lindum Buyers monitor material deliveries. Large quantities of surplus materials are primarily returned to the original supplier. In the event that this isn’t possible, the Site Agent advises LWR of the materials to obtain guidance as to the most appropriate method of removal to facilitate re-use.

### **Green Procurement and the Use of Sustainable Materials**

Environmental consideration is now an integral part of our purchasing process. Consideration is made of environmental attributes throughout a products life-cycle, comparison of environmental impacts and access to locally produced materials, when possible, is made.

Lindum is committed to the use of sustainably sourced material. All timber used for, or in the construction of our projects is FSC or PEFC certified. In addition products such as bricks, blocks and concrete are certified under the EMS scheme.

Locally generated recycled aggregates are always given priority over natural raw product.

### **Logistics**

The following factors are considered, fuel management, fuel type, choice of vehicle and servicing schedules. Managers must ensure that only necessary journeys are made and whenever possible journeys are planned to allow sharing.

### **Direct CO<sub>2</sub> Emission Reduction and Energy management**

Priority is given to the provision of locally sourced materials and labour in order to minimise CO<sub>2</sub> emissions. Wherever possible all meeting attendees co-ordinate their travel arrangements and venues to minimise the number of separate journeys undertaken.

Key to not only the environment but also our competitiveness is the minimisation of energy usage; this is viewed as critical to the success of all our projects.

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### **Information, Instruction and Supervision**

Information will be made available to all employees and subcontractors, this will include;

- Site rules
- Emergency plan
- Incident reporting
- Organisation detailing key personnel with environmental responsibilities
- Environmental audits and inspections
- Recent alerts

### **Competence and Training**

Lindum Group will ensure that employees possess the appropriate level of environmental competence dependent on their role within the company, with all employees attending an Environmental Awareness Course. This will be achieved through the combination of appropriate recruitment, training, selection and development of individuals.

The specific training needs of individuals will be identified in the following ways;

- Performance development appraisals for all staff
- Environmental monitoring
- Recommendations arising from audits and inspections

The Training Department will ensure a record of all environmental training provided to employees is maintained.

Those who are responsible for engaging subcontractors to carry out work will ensure that only those companies, who have been assessed as having the appropriate competencies, including environmental training, are engaged to carry out work on behalf of Lindum Group.

### **Communication**

Lindum Group will create and sustain an awareness of the importance of environmental issues by the use of written, verbal and visual communication.

Managers will ensure that their employees are informed, instructed and consulted on the environmental aspects of their day-to-day work. To promote environmental awareness and minimise the risk of environmental offences, all sites are encouraged to report environmental observations which may include; waste, discharges, spills, air emissions, nuisance and wildlife.

To ensure that contact with enforcement authorities relating to site visits and communication via emails, letters or telephone is captured and managed, Lindum Group will record this on Form 56. The purpose of recording these contacts is to ensure that any concerns expressed by an enforcing authority, or any actions required, are dealt with in timely and appropriate manner.

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### **Environmental Incident & Emergency Procedures**

Site environmental checklists are completed to identify all potential risks. Environmental inspection checklists will be maintained. Where an environmental incident occurs it will be handled as per the company procedure for reporting incidents and accidents. Environmental incident reports will be completed in the event of an environmental incident occurring. Site Managers will apply set procedures to contain any incident and notify relevant authorities as appropriate.

### **Documentation & Records**

For construction projects, a site Environmental File is maintained for the purpose of retaining hard copies of all relevant documents and information. The site Environmental File will contain the following;

#### Aspects and Impacts

Aspects and Impacts Register                      Form 84

#### Waste Management Records

Site Waste Management Plan  
Waste Transfer/consignment notes  
Waste Carriers registration certificates  
Permits and Exemptions

Observation Reports                                      Form 109

Environmental Incident Report                      Form 102

Enforcement Authority Record                      Form 56

Environmental Risk Control Guidelines              1 to 29

Environmental Procedure 1. Control of Environmental Incidents  
Environmental Procedure 2. Identifying Environmental Impacts





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### **Measuring, Monitoring and Checking**

A variety of monitoring techniques are used within Lindum Group to measure environmental performance.

#### **Health, Safety and Environmental Department Audits**

All operational sites will be audited by either one of Lindum Groups internal advisors or our external consultants. These will be carried out on a frequency basis, or as directed by the client and/or needs of the project. All audits will be scored and logged and reported back to each division as part of the Divisional Safety and Environmental Meeting. A plan will be implemented to address any noncompliance to determine the action required to rectify the situation.

Where a significant Environmental Impact has been identified a detailed Environmental Inspection will be carried out.

The Group's Health and Safety Co-ordinator and Advisors carry out routine site inspections and environmental issues identified will be included in their reports.

#### **Senior Management Inspections**

All Senior Managers are tasked with completing health, safety and environmental inspections on a monthly basis in areas of business under their control. Inspections will be carried out on site and numbers of inspections completed will be monitored.

#### **Observation Reporting**

Environmental observations and minor incidents relating to waste, discharges, spills, air emissions, nuisance, wildlife, and archaeology should be identified and reported to the Group Environmental and Safety Coordinator on Form 109.

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