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1. Environmental Policy Statement

The Directors of Emerson Crane Hire Limited are committed, as far as is practicable, to managing our affairs in such a way that, having regard to the nature and scale of our operation, that those operations are conducted in such a manner as to minimise the harmful effects upon the environment. They will take all reasonable measures to ensure a continual improvement in this respect and to prevent pollution.

The Directors will ensure that we comply with and continue to comply with all relevant environmental legislation regulations and other requirements including, where applicable, those of our customers and the ultimate authority for whom we work, including various London Boroughs, Network Rail and London Underground Limited.

In order to achieve this, we ensure that we are aware of, and that this environmental management Policy addresses the requirements of BS EN ISO 14001:2004.

Mr Liam Clancy has overall responsibility for Environmental matters. Mr Jonathan Callow has been given the responsibility for identifying the environmental aspects and impacts of our operations and activities, for establishing and periodically reviewing relevant environmental objectives and targets and for implementing and maintaining appropriate processes to ensure that these objectives and targets are achieved. The Environmental Policy and Procedures as well as the Environmental Aspects and Impacts Register will be reviewed at least annually. Mr Callow is also responsible for ensuring that our environmental processes are maintained, that all of our personnel are aware of and understand our Environmental Policy and for making this policy available to the Public, where deemed necessary. Mr Derek Potts will stand in for Mr Callow when necessary.

Signed

Liam Clancy
Managing Director
2nd September 2015
2. Organisational Chart Regarding Environmental Issues
## 2. Responsibilities for Environmental Issues

<table>
<thead>
<tr>
<th>Managing Director</th>
<th>Directors</th>
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| • Has overall accountability for implementing the Emerson Crane Hire Ltd Environmental Policy and Procedures.  
• Ensure that sufficient resources are available to enable the Emerson Crane Hire Ltd Environmental Policy and Procedures to function effectively.  
• Allocate sufficient resources, including finance, to enable the Emerson Crane Hire Ltd Environmental Policy and Procedures to function effectively on projects.  
• Ensure that the Emerson Crane Hire Ltd Environmental Policy and Procedures are reviewed with the Emerson Crane Hire Ltd Directors and Emerson Crane Hire Ltd HSQE Manager and updated as necessary.  
• Ensure that the HSQE Team have adequate resources to provide appropriate support to all departments.  
• Review the performance of the organisation in terms of the Environment.  
• Advise the Directors on all Environmental Procedures that affect Emerson Crane Hire Ltd activities.  
• Remain informed on matters of Environmental Accidents / Incidents and all Environmental KPIs and indicators of a fully functioning Environmental Management System. Take all required steps to ensure continual improvement.  
• Champion the Environment and the pursuit of an excellent Environmental culture at all times. | • Review the overall performance of the organisation in terms of the Environment.  
• Take a proactive approach to the implementation of the Emerson Crane Hire Ltd Environmental Policy and Procedures.  
• Ensure that the Environmental performance of their area of responsibility is monitored and reviewed, and implement measures to improve performance.  
• Ensure all staff under their control receives training in Environmental awareness.  
• Ensure that all staff are made aware of their responsibilities as laid down by the Emerson Crane Hire Ltd Environmental Policy and Procedures.  
• Be familiar with the broad requirements of Environmental legislation and requirements of major principal contractors and clients.  
• Monitor the Environmental performance of the projects under their control and implement measures to improve performance.  
• Allocate sufficient resources to the projects under their control to implement the requirements of the Emerson Crane Hire Ltd Environmental Policy and Procedures.  
• Ensure that staff under their control are made aware of their responsibilities as defined by the Emerson Crane Hire Ltd Environmental Policy and Procedures.  
• Ensure that adequate Environmental emergency arrangements are provided and maintained.  
• Champion the Environment and the pursuit of an excellent Environmental culture at all times. |
Operational Managers –  
Hire Desk Manager, Workshop Manager, Transport Manager, Training Manager

- Know the requirements of Environmental legislation and the arrangements of Emerson Crane Hire Ltd Environmental Policy and Procedures.
- Arrange meaningful and relevant Aspects and Impacts Assessments as well as Environmental Risk assessments take place under place in areas under your control.
- Investigate all Environmental accidents and incidents in line with ECH procedures.
- Ensure that legislation is observed, that all registers, records and reports are in order.
- Ensure that adequate Environmental accident/ incident facilities and mop-up personnel are available and staff is made aware of these arrangements. Ensure that there is adequate and maintained Environmental Emergency response is equipment available.
- Discipline those who constantly fail to consider the Environment around them.
- Accompany the enforcing authorities during their inspections and inform the Emerson Crane Hire Ltd HSQE Manager immediately of all visits or actions taken by the Environment Agency or Environmental Health Officers.
- Ensure that activities on site only commence when Environmental Risk Assessments and/or Method Statements have been developed and are worked to.
- Ensure that the arrangements detailed in job or project RAMS are fully implemented.
- Arrange delivery and storage of materials safely and plan and maintain a tidy site.
- Ensure that all waste on site is separated and properly disposed of – using ECH appointed waste contractors.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Check that all machinery and plant are maintained in good condition and are used in the correct manner.
- Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.
- Ensure that Sub-contractors have been approved under the requirements of Emerson Crane Hire Ltd Occupational Health & Safety Management System before they are contracted to the company.
- Monitor Environmental performance and take action to remedy any shortcomings.
- Ensure that all Environmental accidents and incidents are immediately reported by whatever means available to the safety manager and their line manager.
- Champion the Environment and the pursuit of an excellent Environmental culture at all times.
Operational Managers – Appointed Person

- Know the requirements of Environmental legislation and the arrangements of Emerson Crane Hire Ltd Environmental Policy and Procedures.
- Consider the implications of the Environmental information provided by the Client/CDM Co-ordinator.
- Organise the work on site so that work is carried out to the standard required by the ECH Environmental Policy and Procedures and with minimum risk to the Environment.
- Investigate all Environmental accidents and incidents in line with ECH procedures.
- Ensure that legislation is observed, that all registers, records and reports are in order.
- Ensure that activities on site only commence when Environmental Risk Assessments and/or Method Statements have been developed and are worked to.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Ensure that the arrangements detailed in job or project RAMS are fully implemented.
- Ensure that all waste on site is separated and properly disposed of using ECH appointed waste contractors.
- Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.
- Monitor Environmental performance and take action to remedy any shortcomings.
- Ensure that all Environmental accidents and incidents are immediately reported by whatever means available to the safety manager and their line manager.
- Champion the Environment and the pursuit of an excellent Environmental culture at all times.

Sales Managers / Tender Managers

- Know the requirements of Environmental legislation and the arrangements of Emerson Crane Hire Ltd Environmental Policy and Procedures.
- Consider the implications of the Environmental information provided by the Client/CDM Co-ordinator.
- Ensure that Sub-contractors have been approved under the requirements of Emerson Crane Hire Ltd Occupational Health & Safety Management System before they are contracted to the company.
- Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Take action to rectify any environmentally hazardous situation that they observe on site.
- Champion the Environment and the pursuit of an excellent Environmental culture at all times.
<table>
<thead>
<tr>
<th>Site Supervisors – Crane Supervisors</th>
<th>Site Operatives / Yard Operatives / Workshop Operatives</th>
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<tr>
<td>• Know the requirements of Environmental legislation and the arrangements of Emerson Crane Hire Ltd Environmental Policy and Procedures.</td>
<td>• Familiarise themselves with the Environmental risk assessments and control measures therein.</td>
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<td>• Deliver Toolbox Talks on Contract Lifts covering the RAMS and specific Environmental requirements for that job and/or lift.</td>
<td>• Immediately report defects in plant, equipment etc. to their line manager.</td>
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<tr>
<td>• Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.</td>
<td>• Develop a personal responsibility for care of the Environment avoiding improvisation and risk taking.</td>
</tr>
<tr>
<td>• If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.</td>
<td>• Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.</td>
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<td>• Ensure that all waste on site is separated and properly disposed of using ECH procedures. Ensure no waste is left on site. Ensure consignment notes are fully completed for waste leaving site where necessary.</td>
<td>• If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.</td>
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<tr>
<td>• Report defects in plant, equipment etc. to their line manager.</td>
<td>• Do not interfere with any plant, device or procedure which has been installed to protect the Environment. This includes spill kits.</td>
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<tr>
<td>• Ensure that all Environmental accidents and incidents are immediately reported by whatever means available to their line manager.</td>
<td>• Ensure that all Environmental accidents and incidents are promptly reported by whatever means available.</td>
</tr>
<tr>
<td>• Take action to rectify any environmentally hazardous situation that they observe on site.</td>
<td>• Separate company and personal waste using ECH procedures and placing waste into the appropriate bins and/or areas to enable correct disposal by waste contractors.</td>
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<tr>
<td></td>
<td>• If they see any environmentally hazardous situation, take action and report it to the site or yard management immediately.</td>
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Office Managers

- Familiarise themselves with the Emerson Crane Hire Ltd Environmental Policy and Procedures. Ensure that all waste on site is separated and properly disposed of using ECH procedures applicable to the office environment.
- Establish and maintain appropriate Environmental arrangements in their office premises.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Ensure that office staff is suitably trained in Environmental matters.
- Ensure energy efficiency is encouraged and waste minimisation and separation schemes adopted.
- Take action to rectify any environmentally hazardous situation they observe within their office.
- Champion the Environment and the pursuit of an excellent Environmental culture at all times.

- If they see an Environmental hazard within their office report it to their immediate supervisor using form HSF01.
- Reduce, reuse and recycle, where possible.

Apprentices & Young Persons (under 18 years old)

- Use only the correct working methods as instructed by supervisors.
- Immediately report any defects observed in plant or equipment to their supervisor.
- Develop a personal responsibility for the protection of the environment, using common sense; avoiding improvisation and risk taking.
- Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.
- Report any Environmental accident or incident immediately to their supervisor.
- If they see any environmentally hazardous conditions, take action and report to their supervisor.

Office Staff

- Familiarise themselves with the Emerson Crane Hire Ltd Environmental Policy and Procedures applicable to the office environment.
- Comply with any instructions given to them with regard to Environmental matters.
- Know the correct procedure to adopt in the case of an environmental emergency, including the route to take to leave the building.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Attend all Environmental training that your employer requires you to. This will include on-site training and induction, weekend PDC sessions and any other arrangements as required.

Vehicle Drivers

- Comply with this policy’s requirements for Operatives.
- Make regular inspections of their vehicle in line with daily defect reporting procedure (HSF15) and record the findings as required. Ref HSMP02
- Ensure that any defect in their vehicle is reported immediately using defined ECH procedures.
- Drive all vehicles in an environmentally friendly manner, taking consideration for fuel and tyre usage.
Emerson Crane Hire Ltd
HSQE Manager

- Lead and direct the Emerson Crane Hire Ltd Environmental Policy, procedures and culture.
- Provide and support governance process for Environmental performance to inform continuous improvement.
- Ensure competent Environmental support throughout the organisation providing development and coaching.
- Support the leadership team on Environmental excellence providing support and coaching.
- Establish environmental aspects and impacts of our operations and activities and record these as a Register. Review this Register at least annually.
- Establish and periodically review relevant environmental objectives and targets. Implement and maintain appropriate processes to ensure that these objectives and targets are achieved.
- Ensure a Register of Environmental Legislation which is pertinent to the operations of Emerson Crane Hire is kept and is reviewed at least annually and also as legislative changes occur.
- Through site, depot and Management System Audits ensure that the company is in legal compliance with the legislation held within the Environmental Legislation Register and take responsibility to ensure the legal compliance of the company’s operations at all times.
- Ensure the Environmental Policy and Procedures will be reviewed at least annually.
- Lead and develop the Environmental competence requirements for our staff, suppliers and third parties.
- Represent ECH externally to gain and share best practice and consult/influence other stake holders and customers.
- Liaise with external bodies e.g. The Environment Agency and other bodies concerned with the Environment. Take ownership of Environmental complaints.

- Advise the Emerson Crane Hire Ltd Managing Director in all Environmental matters that affect Emerson Crane Hire Ltd’s activities.
- Advise management at all levels on the implementation and amendment, of the Emerson Crane Hire Ltd Environmental Policy and Procedures.
- Develop and collate Environmental performance KPIs. Produce targets and ensure these are measured against and reviewed at least annually.
- Ensure Environmental accidents and incidents are investigated, recommend actions to prevent recurrence and provide information and statistical data to Emerson Crane Hire Ltd.
- Attend Occupational Health, Safety and Environment Committee meetings.
- Ensure periodic and proactive inspections of the premises, processes, plant and activities of ECH are carried out in order to determine whether legislation is being complied with and whether high Environmental standards are being achieved.
- Champion the Environment and the pursuit of an exemplary Environmental culture at all times.

Emerson Crane Hire Ltd
HSQE Officer

- Assist the Emerson Crane Hire HSQE Manager in all his duties as required. Stand in for the HSQE Manager when and where he is not available.
- Champion the Environment and the pursuit of an exemplary Environmental culture at all times.
3. Procurement

Emerson Crane Hire’s procurement policy aims to provide the staff with the best possible quality product at the most effective price.

The following information is therefore required and will be monitored.

1. Company Details
2. Management Systems
3. Policies
4. Certified Management Systems
5. Enforcement Action
6. Training

Specialist suppliers of environmental services or products will be used on an as and when basis to compliment the requirements of the company. Specialist suppliers will be chosen from companies who are approved within the industry.

In the event of a major environmental incident the Company will inform and seek assistance from government agencies, such as the HSE, and environmental services agency.
4. Transportation and Company Vehicles

The transport objective will be to utilise our road haulage vehicle fleet for all movement of machines, ballast etc. before calling on outside hauliers.

Wherever possible the delivery and collection planning should include the practice of multiple loads, split destination and back loading to reduce wastage of fuel and resources. The use of computer software and online mapping (Google maps etc.) will identify the most practicable and cost effective route to be taken.

Planned regular routine maintenance of the company fleet of HGV vehicles and cranes reduces the level of emissions and enhances vehicle fuel consumption.

Planned routine machine maintenance ensures efficient operation, effectiveness and reduction of down time. Machines will be pressure washed on regular basis.

Company cars will have planned regular maintenance that reduces levels of emissions and enhances fuel consumption.

Our Transport Manager will manage the vehicle fleet for purchase and disposal to ensure a consistency throughout the company.
5. COSHH

Prior to purchasing hazardous substances an assessment must be made to see if the activity can be changed or completed without the use of a COSHH substance, where this is not practicable all efforts are to be made to find an environmentally friendly alternative. Where no alternative is available it shall be the responsibility of the purchaser to ensure that all hazardous substances obtained for use by Emerson Crane Hire is supplied with a safety data sheet from the supplier. Where the activity or substance is new, a COSHH assessment and summary sheet is to be completed and sent to the Safety Manager for inclusion into the company documentation.

The COSHH summary sheet and safety data sheets are to be available to the staff for their information.

Storage of COSHH substances will be the responsibility of the Store Manager.

Disposal of COSHH related substances are to be controlled. It will be the responsibility of the Safety Manager to ensure that all materials are disposed of in accordance with legislative information.

The Safety Manager must ensure that all materials are transported in accordance with statutory requirements and industry standards.
6. Waste Disposal

Emerson Crane Hire believes in the hierarchy of Reduce, Reuse, Recycle in respect of waste and does not wish any of its waste to go to landfill. Emerson Crane Hire separates waste and has nominated certified contractors for the removal and disposal of all waste products.

General waste will be separated in all areas into Mixed Recyclable Waste and Mixed Municipal Waste. These will then be placed into containers provided by a certified waste disposal contractor who ensures no waste goes to landfill.

Oils, lubricants and fluids are to be placed into a designated area and collected by a nominated approved contractor for disposal.

Worn and damaged tyres are to be removed by a certified tyre disposal company.

Metal and scrap parts are placed into a designated area and collected by an approved contractor.

Redundant machinery is placed for sale by either tender, auction or other form of sale.

Consignment notes and other documentation required under the Environmental Protection Act (and other environmental legislation) are to be held by the HSQE Department in a “consignment note” folder. These must be kept for a period of at least 2 years.
7. Emergency Response Procedure

In the event of a major fuel leak or machine breakdowns caused by hydraulic leaks or hose failures the operator will shut the machine or vehicle down to reduce fluid loss. Minor spillages up to approximately 20 litres are to be controlled by the use of absorbent mats or granules.

Where contamination of a waterway is possible the operator is to minimise the risk of contamination by either machine digging a retaining trench or by placing absorbent mats on the spillage. Where a spillage is beyond the control of the operator, the operator must seek assistance immediately from the company Health and Safety Manager who will contact the relevant agencies, and inform their Local Manager.

Environment Agency  
24-hour UK Emergency Response  
Tel: 0800 807060

For general information telephone 08459 333111. Time lost in reporting the incident will render the company liable to prosecution.

For non-waterway spillages the requested additional assistance of a service vehicle operator’s spillage kit is acceptable and requests for additional kits should be made to our depot if necessary.
In the event of an environmental accident or incident (spill, leak, contamination etc.) it is the responsibility of those involved to report this to the HSQE Manager. The company “Incident / Accident / Near Miss Reporting Form” should be used to report the event.

The HSQE Manager will co-ordinate any investigation in conjunction with relevant managers as required. An investigation report (QMF042) which will make any recommendations necessary to prevent recurrence shall be produced for each incident. This report should be “signed-off” by a company Director once any required control measures have been implemented and/or if the investigation and follow up actions are complete.
9. Legislation Compliance

The HSQE Manager shall ensure a register of all relevant environmental legislation is kept. This list should be reviewed at least yearly in its entirety and any changes in legislation shall be recorded.

Any changes in legislation should be recorded at any time between yearly reviews when there are any changes to legislation. The HSQE Team should regularly consult the HSE and Environment Agency websites, newsletters and updates provided by external consultants (e.g. Bridgeway Consulting) and any other reasonable source of information of this kind.

Any changes should be reviewed by the HSQE Manager in relation to this policy and company procedures to ensure continued compliance.
10. Sustainability

We aim to operate sustainable and workable practices throughout our operations with express consideration for the environment and to our customers, suppliers, employees and the communities within which we operate.

We seek to minimize adverse impacts through good management, aiming for continuous improvement in our environmental performance and delivering on our duty of care towards future generations. Initiatives we have rolled out include:

- Use of telematics (Navman Wireless Tracking System) to plan the most efficient routes to and from sites and depots.
- We replace our fleet as regularly as we can so that our cranes are the youngest they can be – newer engines produce lower emissions.
- We will only procure cranes that run with biodegradable oils. We also aim to implant bio-oil in some of our older fleet.
- Tyres are maintained at the correct pressures providing optimum fuel consumption and lower emissions. Used tyres are inspected and, if suitable, are recycled or disposed of by an approved contractor.
- Emerson Crane Hire is committed to working with, for and in support of the communities within which we operate. We strive to employ people who are local to our depots and always look to deploy crane and technical support from the closest operational location possible.
This Policy and the procedures within it will be communicated with all employees. This should occur at Company Induction in conjunction with Environmental Awareness training including the company Impacts and Aspects register and the mechanisms for reporting Environmental incidents or concerns (Using HSF16).

The general principals of HSP04 should be used to correspond with employees upon receipt of communications. This training should be extended to all current and future employees. Communication of changes to the Policy or procedures should be made to all employees at the earliest possible time. Communication of pressing environmental issues, incident alerts, general environmental and changes to policy and procedures should be made using the most appropriate methods. These can include Toolbox Talks, printed safety alerts, emails, posters, company memo and through the Company Health & Safety and Environment Committee.

The Company Health & Safety and Environment Committee should meet at regular intervals and should consist of elected or appointed representatives that reflect all areas of the company. These representatives should bring environmental issues to the committee which has been highlighted to them from the workforce or they have concerns about themselves. The HS&E Committee Meetings should also consider environmental accidents and incidents, Aspects and Impacts and all area of Environmental concern of the company and its employees. Minutes should be taken and distributed to all attendees.
12. Communication with External Stakeholders and Complaints Procedure

Any employee of ECH may receive correspondence or contact or other communications from contractors, government agencies (Environment Agency etc.), customers and the public concerning the company’s Environmental performance. Any contact of this kind should be referred in the first instant to the HSQE Team who will then respond to the communication or contact in the appropriate way.

Complaints of an Environmental nature should be recorded within the Quality Management System on QMF28 and investigation should be carried out as per QMP360 although investigation may need to be carried out using Incident Investigation Form (HSF17).

All complaints should be responded to by an appropriate member of the Operational Management Team; where complaints are via an enforcement body or client no responses should be made without authorisation from the HSQE Manager and Managing Director.

All correspondence to the Health & Safety Executive; Environmental Agency / SEPA or the EHO should be reviewed by the Managing Director.

The reasons for complaint should be investigated and corrective / preventive actions taken. Where necessary these should be communicated throughout the company and the OH&S Management System improved as necessary.

Where the site regulator has requested information from the site following a complaint or visit the HSQE Manager and Managing Director should be contacted immediately.
13. Contractors

Emerson Crane Hire should only award contracts to individuals or companies who have fulfilled the required standards of the ECH Prequalification process and have been confirmed as an approved supplier.

Contractors should be advised of the ECH Environmental policy and procedures, specific ECH or client’s requirements that they should comply with when awarded the contract. Contractors and their employees will be advised of any Environmental meetings and be invited / advised of the requirement to attend.

Where contractors employ persons whose first language is not English, it is their responsibility to provide a translator and to notify the operations management team. The operations management team should ensure that there are sufficient numbers of persons in each work area that can act as a translator. Where translators are not available, the work should be stopped until the conditions are met by the contractor.

Contractors are responsible for carrying out briefings on their Environmental and H&S risk assessments, method statements / Toolbox Talks to their personnel; these should be recorded using ECH HSF25 and records kept of all briefings.
14. Document Control

The company has procedures for controlling Environmental documentation documents to ensure that they can be identified with the appropriate function or activity. They are periodically reviewed, revised as necessary and approved for adequacy by authorised personnel prior to issue. Current versions are available at those locations where they are needed. When obsolete, they are promptly removed from all points of issue and points of use.

Documentation should be legible, dated (with dates of revision), readily identifiable, numbered (with a version number), maintained in an orderly manner and retained for at least 6 years. Old versions should be ‘obsoleted’ and appropriately filed.

The original Environmental Policy and Procedures document in its latest version should be stored electronically in the Environment folder within the company intranet. Printed copies should say “uncontrolled when printed”. The electronic version should be the only version shared with external stakeholders (contractors, government agencies and the public) and a copy should be accessible by anyone at www.emersoncrane.co.uk. A printed uncontrolled copy should be available within the “driver’s reception”, in vehicle handbooks and the company handbook. These should be updated when changes are made to the original and distributed as soon as possible.

Controlled documentation means documentation which is to be maintained, reviewed, revised and held in its latest version or template form within the ECH intranet and are to be maintained by the HSQE Team. These records include:

- Environmental policy including roles and responsibilities and Environmental Procedures
- Impacts and Aspects Register
- RAMS Template
- Environmental Audits
- HS&E Inspections and Site Audits
- Environmental Legislation Register
- Environmental Alerts
- Emergency plans procedures responsibilities
- Records of emergency drills

Other records to be kept by the HSQE Team include:

- Consignment notes
- PQQs and External Contractors certification and other records
- External Audit Results and Reports
15. Training

This Policy and the procedures within it will be communicated with all employees. This should occur at Company Induction in conjunction with Environmental Awareness training including the company Impacts and Aspects register and the mechanisms for reporting Environmental incidents or concerns (using HSF16).

Senior Management should set standards for additional Environmental Training appropriate to position within the company and relative responsibilities stated within this Policy. Individual training reviews should take place at least annually between each employee and their Manager to determine if training has been effective and/or if further training is required and/or desirable or requested.
16. Evaluation and Control of Environmental Risk

The HSQE Team will carry out a comprehensive Aspects and Impacts assessment for all the company’s operations. This will be recorded and reviewed at least yearly or when procedures or relevant personnel or equipment changes. The Aspects and Impacts Register should inform the company of changes that can be made to lessen the Impacts surrounding many of the procedures within this policy, for instance training, procurement, waste management etc. as well as legal and other compliance. The register should be reviewed at annual Management Review. The HSQE Team should work with management and the workforce to reduce the impacts of the company’s aspects on a continual basis.

Each contract lift should include an Environmental Risk Assessment specific to the works to be carried out and the location. The Method Statement should then be written with consideration of the findings of the Environmental Risk Assessment and any required Control Measures. The Crane Supervisor must explain the requirements of the Method Statement to all those involved in the lifting operation as part of a toolbox talk before lifting commences.

Site Audits by the HSQE Team and Senior Management Tours should include Environmental considerations. These considerations are listed within the audit checksheet (HSF38). Findings should be recorded and corrective actions given deadlines and responsibilities for completion. The audit form should be signed off by the relevant person once all corrective actions have been implemented and are seen to be effective.

A Weekly Health, Safety, Environment and Fire depot audit is to be carried out by the HSQE Team. Items and aspects to be considered are listed within the audit check sheet (HSF33). Findings should be recorded and corrective actions given deadlines and responsibilities for completion. The audit form should be signed off by the relevant person once all corrective actions have been implemented and are seen to be effective.