

EMERSON CRANE HIRE LTD

ENVIRONMENTAL POLICY

CONTROLLED DOCUMENT

Date	Issue No.	Modification	Authorised by
01/09/2018	2	First review	DJ
03/09/2019	3	Second review	DJ
10/09/2020	4	Third Review	DJ
10/09/2021	5	Forth Review	DJ

1. Introduction

Context of the Organisation

Emerson is the leading crane hire company in London and the Southeast of England. It also provides crane and lifting training and general transport services.

Also need reference to the strategic direction of the business and its broad objectives, plus relationships with any important parties such as major clients, suppliers, partners, and regulatory bodies.

Also identify important internal and external factors which may influence the ability to implement strategic objectives such as political, legal, social, cultural, economic, or environmental impacts.

External factors may include for example awareness of the relevant market, new technology, economic issues, or significant regulatory factors such as relevant legal compliance requirements, whilst internal factors may include the company culture, skills availability, internal communications, company performance, etc.

May also want to reference what environmental, economic, or social impacts the activities of the business may have on the local or wider community. Environmental references may include e.g., sustainability of resources, impacts on climate change, protection of biodiversity, ecosystems or wildlife habitats, lifecycle/carbon footprint of products, etc.

Emerson Crane Hire. is committed to protecting the environment.

An Environmental Management System that meets the requirements of ISO14001:2015 underpins all the company's activities.

All the above requirements are described in this Manual.

Needs of Interested Parties

The actions and/or influence of interested parties have the potential to impact on the performance of the business and its ability to meet its obligations with regard to provision of acceptable products and/or service and legal compliance, and to meet its strategic objectives. The company strives to appreciate and address the relevant requirements of any interested parties

These interested parties are considered in other documents including the Environmental Aspects.

General Requirements

The Environmental Management System

The Environmental Management System brings together the requirements of ISO14001:2015 (environment), and identifies the processes involved.

Scope of the Environmental Management System

The Environmental Management System incorporates the following activities:

The supply of mobile crane hire and associated equipment, the provision of contract lifting services and transport in a variety of environments including those adjacent to rail infrastructure. The provision of specialist training in relation to lifting operations for the construction and other industries. The Environmental Management System applies both to the company's employees and others who work on its behalf.

The Environmental Management System also defines how the company exercises control over outsourced processes.

Process Control (PDCA approach)

The Environmental Management System identifies the key processes necessary to achieve the company's environmental objectives. It sets down how the processes for service delivery are planned and carried out, how these processes shall be monitored and controlled and how the objectives and continual improvement are achieved and identifies risks and opportunities in relation to their achievement. It also defines responsibilities and ensures that the necessary resources and information are made available.

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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, London Underground Limited and any other interested parties identified.

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 14001:2015.

Mr Liam Clancy has overall responsibility for Environmental matters. Mr Denzil Jones 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 Denzil Jones 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.

Sign 

Dated 10/09/2021

Liam Clancy – Managing Director

2. ORGANISATIONAL RESPONSIBILITIES

2.1 Purpose

To define the responsibilities for the EMS. Section 5.3 of ISO14001 applies.

2.2 People and responsibilities

MANAGING DIRECTOR

- 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. Compliance Manager and updated as necessary.
- Ensure that the SHEQ 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 KPI's 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.

DIRECTORS:

- 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 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. Compliance Manager or 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 and 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/Principal Designer.
- 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/Principal Designer.
- Ensure that Sub-Contractors have been approved under the requirements of Emerson Crane Hire Ltd. Occupational Health and 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.

SITE SUPERVISORS – Crane Supervisors

- Know the requirements of Environmental legislation and the arrangements of Emerson Crane Hire Ltd. Environmental Policy and Procedures
- Deliver Toolbox talks on Contract Lifts covering the RAMS and specific Environmental requirements for that job and/or lift.
- 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.
- 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.
- Report defects in plant, equipment etc. to their line manager.
- Ensure that all Environmental accidents and incidents are immediately reported by whatever means available to their line manager.
- Take action to rectify any environmentally hazardous situation that they observe on site.

ALL SITE OPERATIVES, YARD OPERATIVES, WORKSHOP OPERATIVES

- Familiarise themselves with the Environmental risk assessments and control measures therein.
- Immediately report defects in plant, equipment etc. to their line manager.
- Develop a personal responsibility for care of the Environment 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.
- If you are designated special responsibilities in case of an Environmental emergency ensure you fully understand the role and the instructions given to you.
- Do not interfere with any plant, device or procedure which has been installed to protect the Environment. This includes spill kits.
- Ensure that all Environmental accidents and incidents are promptly reported by whatever means available.
- 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
- If they see any environmentally hazardous situation, take action and report it to the site or yard management immediately.

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.

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.
- 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)

- 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.

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. COMPLIANCE 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.
- Maintain 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. M.D. 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 the 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.

3. PROCUREMENT

3.1 Purpose

To ensure that environmental issues are controlled when purchasing items with the potential for an impact on the environment. Section 8.1 of ISO14001 applies.

3.2 Additional Procedures

See also QMP 440 - Purchasing

3.3 Selection and approval

Emerson Crane Hire's procurement policy aims to provide the staff with the best possible environmental solution 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

The provisions of QMP440 will be followed at all times.

Emerson Crane Hire will 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.

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.

Procurement should always include looking at sustainable options as well as Fair Trade items where available. Vehicles will comply with the latest European or British emission standards as a minimum. For company cars, hybrid vehicles will be chosen where possible.

3.4 Use of contractors

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.

COMPANY VEHICLES

3.5 Purpose

To ensure the selection and use of company vehicles is controlled.

3.6 Additional Procedures

See also QMP 440 - Purchasing

3.7 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.

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

3.8 Checks and maintenance

Daily vehicle checks are completed which include a check of the spill kit.

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.

3.9 End of life vehicles

End of life vehicles are typically sold in working order rather than scrapped.

3.10 Refuelling

Refuelling operations onsite use red diesel for cranes and regular diesel for HGVs and cars. Any authorized person is permitted to refuel. Spillages or leaks must be reported promptly to the Hire Desk Manager.

3.11 Vehicle Washing

Onsite vehicle washing must only be carried out in the designated area where an interceptor is present. Operations

3.12 Purpose

To ensure that environmental issues are controlled when managing crane hire, whether contract lift or hire, transport and training. Section 8.1 of ISO14001 applies.

3.13 Additional Procedures

See also QMP 400, QMP 410, QMP 420 and QMP 430.

3.14 Contract Lift, Crane Hire and Transport

When carrying out the site visits as part of planning, the Appointed Persons shall be aware of any potential environmental issues (from both the lifting operation and what is being lifted). The lift plan, risk assessment and Safe System of Work shall take into account any necessary environmental issues.

Any environmental emergencies encountered shall be dealt with in accordance with the [‘Emergencies’](#) Procedure.

Any other environmental incidents should be addressed as in the [‘Noncompliance’](#) Procedure.

Where necessary a review and lessons learnt exercise can be carried out once the job is completed.

3.15 Training Services

Relevant environmental issues including maintenance, load handling are covered during the training provided.

3.16 Workshop

Wastes are dealt with as per the [‘Waste Disposal’](#) Procedure.

The Service Manager is responsible for ensuring that environmental issues are addressed during the day-to-day operations of the workshop.

All air conditioning work is outsourced (see the [‘Procurement’](#) Procedure).

All oils whether new or waste are stored in either double skinned, securely banded or on a banded pallet or similar except containers of 25l or less.

HAZARDOUS SUBSTANCES (COSHH)

3.17 Purpose

To ensure that environmental issues are controlled when selecting and using hazardous substances. Section 8.1 of ISO14001 applies.

3.18 Additional Procedures

See also OH&S Management System

3.19 Selection and approval

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 by the SHEQ Officer.

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 and Service Manager.

Disposal of COSHH substances is to be controlled. It will be the responsibility of the SHEQ Officer to ensure that all materials are disposed of in accordance with the ['Waste Disposal'](#) Procedure.

The SHEQ Officer must ensure that all materials are transported in accordance with statutory requirements and industry standards.

4. WASTE DISPOSAL

4.1 Purpose

To ensure that waste is disposed of correctly. Section 8.1 of ISO14001 applies.

4.2 Additional Procedures

See also QMP 440 - Purchasing

4.3 Waste Collection

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. Annual checks will be made on the currency of the firms' licenses.

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.

4.4 Disposal of Controlled Waste

Controlled waste is collected by the carrier and a transfer note issued (either at each collection or annually) which is signed by the SHEQ Manager or nominated deputy. These are retained for at least 2 years.

4.5 Disposal of Hazardous Waste

Consignment notes and other documentation are to be held by the Compliance Department in a "consignment note" folder. These must be kept for a period of at least 2 years.

4.6 Waste Carrier Licenses

The Company maintains its own waste carrier licenses.

Others collecting waste from Emerson Crane hire shall have their licenses checked at least annually by the SHEQ Manager (see <https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers>)

5. EMERGENCIES

5.1 Purpose

To ensure that environmental issues are controlled when purchasing items with the potential for an impact on the environment. Section 8.2 of ISO14001 applies.

5.2 Additional Procedures

See also OH&S Management System

5.3 Emergencies

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. **Environment agency 24hr UK Emergency response telephone no 0800 807060** and inform their Local Manager. For general information **Tel 08459 333111**. Time lost in reporting the incident will render the company liable to prosecution.

For non-waterway spillages the assistance of a service vehicle operator's spillage kit is acceptable and requests for additional kits should be made to the depot if necessary.

Routine fire drills are carried out in the office and may also be carried out on other sites the company is working on.

6. NONCOMPLIANCE

6.1 Purpose

To ensure that environmental non-compliance's are controlled and managed. Section 10.2 of ISO14001 applies.

6.2 Additional Procedures

See also QMP 350 - Nonconformity

6.3 Recording and investigating non-compliances

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 Compliance Manager. The company "Incident/Accident/Near Miss Reporting Form" should be used to report the event.

The Compliance Manager will coordinate 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 corrective actions have been implemented and/or if the investigation and follow up actions are complete.

7. LEGISLATION COMPLIANCE

7.1 Purpose

To ensure that relevant legislation and other compliance requirements are identified. Sections 6.1.3 and 9.1.2 of ISO14001 apply.

7.2 Additional Procedures

QMP400 and QMP410

7.3 Identifying and recording Compliance Obligations

The Compliance Manager shall ensure a register of all relevant environmental compliance obligations 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 SHEQ Team should regularly consult the Environment Agency websites, newsletters and updates provided by external consultants and any other reasonable source of information of this kind.

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

7.4 Review of Compliance

At least annually a check of compliance against the Register of Compliance Obligations should be completed and recorded.

8. SUSTAINABILITY

8.1 Purpose

To address sustainability issues across the group. Section 8.1 of ISO14001 applies.

8.2 Additional Procedures

None

8.3 Selection and approval

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 re-cycled 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.
- Emerson Crane Hire is committed to procurement of Fair Trade and other ethically produced items where possible.

9. COMMUNICATION

9.1 Purpose

To ensure that communication on environmental issues is controlled. Section 7.4 of ISO14001 applies.

9.2 Additional Procedures

See also QMP360

9.3 Internal Communication

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 to 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 and Safety and Environment Committee.

The Company Health and 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.

9.4 External Communication

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 SHEQ 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](#))

(cont.)

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 Compliance Manager and M.D.

All correspondence to the Health and Safety Executive; Environmental Agency / SEPA (Scottish Environmental Protection Agency) or a EHO (Environmental Health Officer) should be reviewed by the M.D.

The reasons for a complaint should be investigated and corrective / preventive actions taken. Where necessary these should be communicated throughout the company and the EMS improved as necessary.

Where the site regulator has requested information from the site following a complaint or visit the Compliance Manager and M.D. should be contacted immediately.

DOCUMENT CONTROL

9.5 Purpose

To ensure that environmental documents are issued, controlled, recorded and maintained. Section 7.5 of ISO14001 applies.

9.6 Additional Procedures

See also QMP 340 – Control of Documents, Data and Records

9.7 Documented Information

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.

9.8 Policy and Procedures

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 stake holders (contractors, government agencies and the public) and a copy should be accessible by anyone on 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 updates 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 SHEQ 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 and Emergency plans procedures responsibilities and records of emergency drills.

Other records to be kept by the SHEQ Team include Consignment notes, PQQs and External Contractors certification and other records, External Audit Results and Reports

TRAINING

9.9 Purpose

To ensure that all staff receive environmental awareness training and are competent. Section 7.2 of ISO14001 applies.

9.10 Additional Procedures

See also QMP510

9.11 Awareness and competence

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.

10. EVALUATION AND CONTROL OF ENVIRONMENTAL RISK

10.1 Purpose

To ensure that environmental aspects, impacts and risks are identified and recorded. Section 8.1 of ISO14001 applies.

10.2 Additional Procedures

None.

10.3 Aspects and Impacts

The SHEQ 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 SHEQ Team should work with management and the workforce to reduce the impacts of the company's aspects on a continual basis.

Significant aspects should be reviewed at Management Review and be subject to objectives to improve where applicable.

The risks and opportunities arising from the aspects should be evaluated.

10.4 Risk assessment and audit

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 SHEQ Team and Senior Management Tours should include Environmental considerations. These considerations are listed within the audit check sheet (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 Monthly Health, Safety, Environment and Fire depot audit is to be carried out by the SHEQ 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.

A schedule for the auditing of the company's Environmental Policy, records, procedures and general performance should be drawn up with audits at least once every 3 months. 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.