

ROBERT E LEE LIMITED

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ENVIRONMENTAL POLICY 2009



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Contents

1.1 Environmental Policy Statement

Organisational Responsibilities

2.1 Organogram

2.2 Responsibilities of the Director

2.3 Responsibilities of Consultants

2.4 Responsibilities of Supervisors

2.5 Responsibilities of Employees

Arrangements

3.1 Aims and objectives

3.2 Air

3.3 Communication

3.4 Contaminated land

3.5 Energy conservation

3.6 Noise

3.7 Office waste

3.8 Purchasing

3.9 Recycling

3.10 Training

3.11 Water

3.12 Waste

1. Environmental Policy Statement

This policy applies to all areas and operations of Robert E Lee Limited undertakings.

Robert E Lee Limited principal operations are undertaken within the construction industry for various clients. We recognise that our operations interact with the environment and are firmly committed to eliminating or reducing adverse impacts.

In particular, Robert E Lee Limited will achieve this through our commitment to:

- Comply with all relevant environmental legislation and regulations.
- Review the actual and potential environmental impacts for all activities.
- Strive for continual improvement in environmental performance through setting objectives and targets and developing key performance indicators.
- Employ best practice to prevent pollution, minimise waste and maximise the efficient use of resources (materials, fuel and energy).
- Identify and manage key risks and have arrangements in place to respond to all foreseeable incidents and emergencies.
- Involve Employees and Contractors in our environmental programs and provide training to enable them to discharge their responsibilities.
- Engage in communication with suppliers to encourage their participation in environmental best practice.
- Produce an annual environmental report to set out progress to Employees, Regulators, Clients, Suppliers and other interested parties.

Every Employee has an individual responsibility to help meet the requirements of this policy. All constructive ideas for minimising adverse environmental impact can be discussed with your supervisor or myself.

Signed..... Mr. David Honey

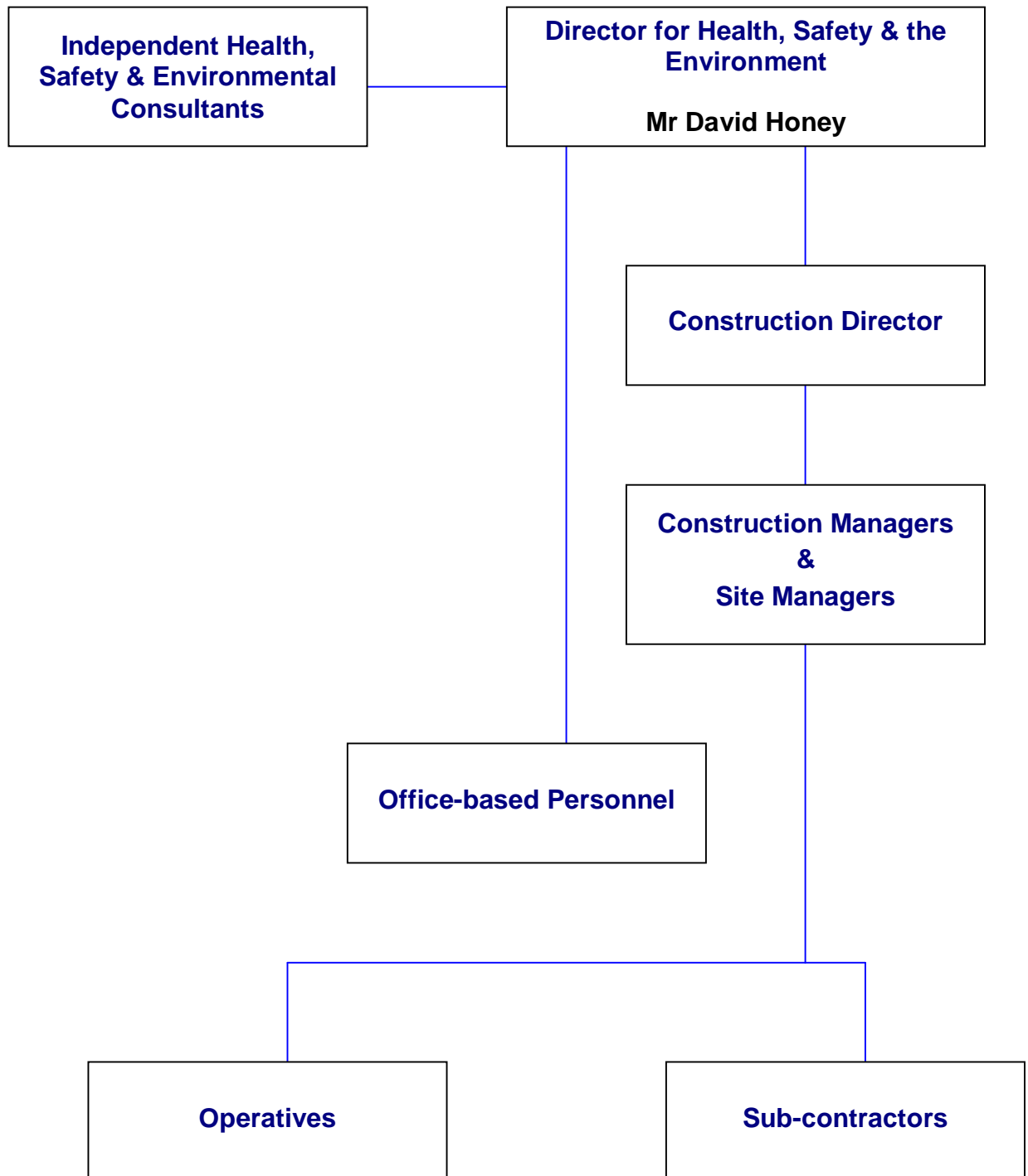
Robert E Lee Plastering Contractors Limited

Dated: August 2009

This Policy will be reviewed on an annual basis, or
If there is reason to suspect that it is no longer valid, or
If there has been a significant change in the matters to which it relates.

2. Organisational Arrangements

2.1 Organogram



The Responsibilities of the Director Mr. D. Honey

Mr. D. Honey has overall responsibility for ensuring that all employees understand their role, accountability and involvement in contributing to meeting the aims and objectives of the company's environmental policy.

Further responsibilities:-

- To ensure that an environmental policy has been prepared and to update and review at regular intervals.
- To ensure that the organisations vision and direction in relation to environmental aspects is consistent with current socio-economic factors.
- To agree and endorse the environmental policy and corporate objectives of Robert E Lee Ltd.
- To develop policy commitments, review action plans and environmental targets.
- To ensure that the organisation complies with all statutory legal requirements.
- To monitor environmental performance, management systems and internal procedures.
- To develop targets for procurement and requirements of stakeholders, contractors and suppliers.
- To ensure regulatory compliance and continual improvement in all environmental aspects.
- To identify employee training needs and maintain an environmentally aware workforce.

2.2 The Responsibilities of Consultants

- To provide professional advice and support to Robert E Lee Ltd on environmental issues, aspects and legislation.
- To develop, when requested, environmental procedures, programmes and achievable targets.
- To monitor environmental performance, management procedures and systems within the company.
- To review overall environmental performance, identify weaknesses and make appropriate recommendations to Mr. D. Honey.
- To inform Mr. D. Honey of any relevant changes to environmental legislation and industry guidance.

2.3 The Responsibilities of Construction / Site Management

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement.
- To promote the company's environmental policy and general awareness of the adverse environmental impacts.
- To ensure Employees are informed and aware of any specific environmental aspects of their work activities.
- To ensure Employees undertake work processes in accordance with the company policy and any training received.
- Collect and submit to Mr. D. Honey data and results of environmental performance.

2.4 The Responsibilities of Employees

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement.
- To promote the company's environmental policy and general awareness of the adverse environmental impacts.
- To ensure work processes are undertaken in accordance with the company's environmental policy and any training received.
- To inform the company of any areas of environmental management that may give rise to concern.

3.0 Arrangements

3.1 Aims & Objectives

The aims and objectives of Robert E Lee Ltd are to ensure that the environmental aspects of the company's undertakings do not have any adverse environmental impact.

Where it is not possible to eliminate the impact, to reduce or minimise the environmental impact by the use of recycling, waste separation and other techniques.

Performance indicators will be used to assess quantifiable results so that the degree of achievement or failure can be identified.

Targets and objectives shall be achievable in relation to resources available and other business priorities, but not too easily reached. Targets and objectives shall be achieved in a given and known time frame. If the objective time period is many months or years then monitoring of progress will be undertaken.

3.2 Air

Robert E Lee Limited will ensure through our maintenance and purchasing programme that site mobile machinery meets the emissions of gaseous and particulate pollutant levels outlined in various E.U. Directives and that continuous improvement is achieved.

Dust will be reduced so far as is practicable by the enclosure of sites by wooden hoarding, preventing migration off of site. Some works are undertaken in the open air and, except in high winds or unusual locations; fumes and dust are only likely to affect those in the immediate vicinity.

Robert E Lee Limited will endeavour to ensure through our maintenance and buying programme that site mobile machinery meets the emissions of gaseous and particulate pollutant levels outlined.

3.3 Communication

Effective two-way communication between Employees at all levels is seen by Robert E Lee Limited as an important part of ensuring the protection of the environment. Robert E Lee Limited will work with all persons affected by their undertakings to ensure that information on environmental aspects and impacts are shared.

Communication with Employees will take various forms and Employees are reminded that they may raise any health or safety issue with any member of management in total confidence. Employees are actively encouraged to raise any concerns they may have in relation to environmental aspects.

3.4 Contaminated Land

Site investigations will be undertaken by the client prior to the commencement of works with the results communicated by the Principal Contractor's construction phase health and safety plan or by the CDM Coordinator's pre-construction information.

Should the details of a survey not be supplied and it is suspected that pollution is present at the commencement of works the client or CDM Coordinator will be contacted to arrange a decontamination operation or asked to provide an adequate survey.

3.5 Energy Conservation

Increasing energy costs, coupled with both national and governmental needs for energy conservation, has resulted in "Energy Management" being regarded as an important task in all of the work activities undertaken by Robert E Lee Limited.

Robert E Lee Limited recognises that energy efficient measures can be achieved through the correct selection of appropriate plant and equipment.

Energy saving requirements may also involve such things as ensuring a piece of plant has completed all necessary tasks before being withdrawn from a project as its return to site at a later date will result in poor logistic management and added pollution.

All persons involved at the planning or tendering stage of projects will fully consider all possible areas of energy reduction and conservation.

3.6 Noise

Robert E Lee Limited will undertake to work within the parameters outlined by the Principal Contractor or the Local Authority to restrict noisy activities to the time periods requested. All controls will be applied including a rigid maintenance regime, sufficient damping, lagging and other acoustic controls to ensure the reduction of noise.

Robert E Lee Limited will undertake to act proactively, to ensure the elimination of unnecessary noise and to reduce noise that is produced to an acceptable level.

Best Available Technique (BAT) will be used to prevent the effect of noise to the limit reasonably practicable having regard to the local conditions and circumstances, to the current state of technical knowledge and to the financial implications.

3.7 Office waste

Through careful and efficient office management and the implementation of a quality system, the amount of waste created is kept to an absolute minimum. Robert E Lee Limited is also promoting the recycling of office waste wherever possible.

Electrical energy is conserved by the use of high efficiency, fluorescent lighting which is switched off in rooms, which are not in use. Natural gas energy used in heating systems is conserved by regular maintenance, servicing and individual thermostatic controls.

3.8 Purchasing

Robert E Lee Limited will ensure that all our wholesalers and suppliers provide us and our customers, with goods and materials that have limited environmental impact. The aim of the company is to achieve this by:-

- Purchasing goods, plant and materials, which can be manufactured used and disposed of in an environmentally responsible way.
- Meeting, where appropriate, the standards required by all environmental legislation.
- Specifying and purchasing of plant and items, which will, in the first instance have a long working life and can be recycled when the service life has ended.
- Specifying and purchasing items, which can be operated in an energy efficient manner.
- Specifying and purchasing items that are of the best quality, have replacement parts and are not part of the “throw away” culture.
- Selecting suppliers and contractors who are themselves undertaking measures to make environmental improvements.
- Purchasing equipment with due consideration of noise, emissions and vibration produced.
- The negotiation of favourable rates from water, gas and electrical service providers.

3.9 Recycling

Robert E Lee Limited as a company is committed to minimising all waste in its operations and works. Where waste may be produced, every effort will be made to recycle such materials.

Robert E Lee Limited will make full use of recycling facilities provided by the Supplier, Manufacturer, Principal Contractor or Local Authority.

3.10 Training

All employees will be given training in general environmental awareness, task specific procedures and methods that will be used to reduce or minimise the impact to the environment by the undertakings of the company.

M.E.L (Health & Safety) Consultants Limited will assist Mr. D. Honey in identifying training needs through out the company, preparing appropriate training programmes and delivering those programmes to Employees.

3.11 Water

The Employees of Robert E Lee Limited are aware of the importance to protect the integrity of groundwater, rivers, lakes and other elements of the water system. The company recognises duties under the Groundwater Regulations 1999, Anti-Pollution Works Regulations 1999 and the Water Resources Act 1991.

In particular section 85 of the Water Resources Act 1991 which states that, 'no person shall cause or knowingly permit any poisonous, noxious or toxic material or solid waste to enter a 'controlled water'. 'Causing' means not only deliberately releasing any polluting matter but also causing the pollution accidentally, by being the operator of a plant or process.

Where necessary to prevent water pollution, drain covers, self-contained water systems and other methods will be used. Detergents and solvents are to be as environmentally friendly as possible and where not possible Robert E Lee Limited will ensure that the migration of substances does not adversely impact on the environment.

3.12 Waste

Robert E Lee Ltd will use the waste management approach to as outlined below:-

- Reduce the amount of waste produced to a minimum.
- Re-use and recycle, wherever reasonably practicable.
- Recover through the use of treatments and recovery processes.
- Responsible disposal of waste, including waste segregation and compaction.

This will be achieved by identification of:-

- Sources / processes of losses and waste.
- Quantities, quality and type of waste.
- Opportunities for re-use and recycling.

Robert E Lee Ltd recognises its Duty of Care under The Environmental Protection Act 1990, the Environmental Protection (Duty of Care) Regulations 1991, The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991, Hazardous Waste (England and Wales) (Amendment) Regulations 2009 and other associated statutory provisions.

“Hazardous Waste” will only be released to a licensed “Registered Carrier” after proof (original only) has been produced by an “authorised person” has been seen and a copy retained. All parts of the “Waste Transfer” note will be suitably completed with a copy remaining with Robert E Lee Ltd and records of the “Hazardous Waste” disposal is to be retained for 3 years after deposit of the waste.

Where over 500 kg of “Hazardous Waste” is produced over a 12 month period on our site/premises, Robert E Lee Ltd will register that location with the Environment Agency, annually after the first notification.

Under the new Environment Agency guidelines, after 1st April 2009, gypsum based products, such as plasterboard, can no longer be sent to landfill alongside biodegradable waste. Gypsum, the main raw material for plasterboard, is a sulphate and is classified as non-hazardous unless it is contaminated with a hazardous substance.

It is the responsibility of Robert E Lee Ltd to manage all waste streams, to dispose of waste in a proper manner and to classify the content of individual waste skips where this responsibility is not carried out by the principal contractor.

Robert E Lee Ltd shall ensure compliance with the revised guidelines by implementing the following measures or, in instances where we are operating under a principal contractor, ensuring that they are completed:

- Loads containing any identifiable gypsum or plasterboard will not be taken to landfill, but shall be treated to remove the gypsum or plasterboard.
- Where a load of gypsum or plasterboard has to go to landfill, it shall be deposited in a separate cell where no biodegradable waste has been accepted.
- Gypsum-based material and plasterboard shall be separated from other wastes on site so it can either be recycled, reused or disposed of properly at landfill.
- Plasterboard shall be separately packaged in a load of mixed waste so that it can easily be identified for separation at a waste transfer station.
- Depositing gypsum or plasterboard in a separate cell with non-biodegradable waste such as asbestos or stable non-reactive hazardous waste. There are 47 permitted sites in England and Wales with such separate cells.
- Setting aside a dry storage area for bagged plaster mix, reducing wastage and saving money in the process.
- Preventing the washing of mixed or dry plaster into drains or surface waters as this can cause water pollution.
- Allowing wet, mixed plaster to go off before disposal (liquid wastes shall not be disposed to landfill).
- Prohibiting the deliberate mixing of gypsum or plasterboard waste with other waste for landfill.