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1. PURPOSE

This procedure describes the considerations to be given and actions to be taken in order to prevent pollution of the environment arising from VW UK's activities.

2. SCOPE

This procedure is mandatory and is applicable to all contracts or workplaces, except VolkerRail, to ensure appropriate response and reporting.

3. REFERENCES (INPUTS)

- *Environmental Policy and Practice*
- SEPA guidance GPP 21 - Pollution Incident Response Planning
- H07 *Investigation and Reporting of Accidents Incidents and Close Calls*
- Section 61 Agreements - Control of Pollution Act 1974
- E01-01 *Environmental Aspects and Impacts Register*
- BS EN ISO 14001:2015, Section 8.1 Operational Planning and Control
- BS EN ISO 14001:2015, Section 8.2 Emergency Preparedness and Response

4. ABBREVIATIONS & DEFINITION OF TERMS

EA - Environment Agency

ECoW - Environmental Clerk of Works

Env - Representative from the Environmental Team

NRA - Natural Resource Wales

SEPA - Scottish Environment Protection Agency

SM - Site Manager (person responsible for day to day running of the site i.e., Project Manager, Site Agent)

5. ACTIONS (PROCESS)

RESPONSIBILITY

5.1 General

All projects will undergo an Environmental Planning Meeting to review the environmental risks through the completion of an E01-02 *Environmental Risk Assessment*, to develop appropriate mitigation / control.

SM / Env

(Please refer to Q60-03 *Environmental Start-up Meeting* (VS Only), EMS-01 *Environmental Planning Meeting Agenda* or HSE-60 *Health, Safety, Environmental and Quality Planning Meeting Agenda* as applicable to specific business unit)

Where a high risk of pollution to a watercourse is identified controls shall be established. The appropriate Environmental Regulator (EA / SEPA / NRW) may be notified, and any further control measures agreed.

SM / Env

Method statements shall detail proposals to identify and locate watercourses including existing sewers and pipelines to enable suitable preventative and emergency measures to be agreed, such as spill kits or oil booms.

SM

Potential pollutants shall be identified, and control measures detailed in H01-04 *Site Management Plan*, including any environmental emergency procedures.

SM

Proposals shall be considered with regard to airborne pollutants such as:

SM

- Dust from earthmoving and other vehicles on site;
- Wood dust from joinery or other woodworking;
- Fumes from welding;
- Sprays from painting, sealants, curing compounds and formwork oils;
- Dust from the cutting or abrasion of concrete products or similar items; and
- Dust from crushing or screening processes

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5. ACTIONS (PROCESS) (CONTINUED) RESPONSIBILITY

5.1 General (Continued)

Dust created by vehicle movements shall be controlled by either damping down with water or polymer spray without creating a risk of silt pollution by 'run off' into a watercourse, and by imposing special restrictions to prevent dust arising, such as speed limits.

Dust extractors, collection or suppression devices shall be used on cutting machines and saws wherever possible. SM

Loose materials, which could become airborne, shall be secured or covered with sheeting (particularly during transportation). SM

Consideration will be given for the use of covered skips, especially when working in residential or environmentally sensitive areas. SM

Plant shall be positioned so that exhaust emission does not cause nuisance and maintained to ensure emissions are kept to a minimum. Drip trays or other containment measures shall be used where there is a risk of fuel spillage or engine oil leakage. SM

Method statements shall detail proposals to identify and locate watercourses including existing sewers and pipelines to enable suitable preventative and emergency measures to be agreed, such as spill kits or oil booms. SM

Fuel oils, lubricants, paints and chemicals shall be stored either in bunded containers or on drip trays to prevent seepage into a watercourse in the event of a leak or spillage. SM

Wherever possible potential pollutants shall be stored in locked containers to prevent vandalism, which may cause pollution. SM

Valves trigger guns and discharge hoses shall be tamper proof and securely locked when not in use and only operated by authorised personnel. SM

Concrete pours adjacent to watercourses shall be carefully controlled to minimise the risk of contamination from the cement. SM

Washing out of concrete and mortar batching plant shall only be carried out at agreed locations, which may be in the form of a settlement lagoon to avoid ground pollution from cement residue. SM

Agreement from the Environment Agency shall be obtained before any discharge of water is made into a watercourse from the site, such as pumping from excavations, which may require settlement or filtration lagoons. SM

5.2 Environmental Incident Response

E03-G01 *Environmental Incident Response Guidance* provides direction in the event of an environmental incident. SM

A laminated copy of the relevant section of E03-G01 *Environmental Incident Response Guidance* shall be displayed at any location where the information might be required. The "Actions in the Event of an Oil, Chemical or Fuel Spill" section must be placed in all spill kits. SM

E03-01 *Spill Kit Checklist* shall be used on a monthly basis to record spill kit contents and after any incident where the content is used. SM

Health and safety are paramount when involved with any environmental incident. When required, ensure appropriate health and safety precautions are taken. SM

In the event of a spillage, the actions set out in the E03-G01 *Environmental Incident Response Guidance* must be followed. SM

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5. ACTIONS (PROCESS) (CONTINUED) RESPONSIBILITY

5.2 Environmental Incident Response (Continued)

If the spillage is too significant to be dealt with using on-site spill equipment, or in the event of significant pollution entering a watercourse, one of the emergency specialist clean-up companies detailed in H01-01 SMP should be contacted to assist. SM

5.3 Reporting

In the event of an incident occurring, an Environmental incident report should be logged via EcoOnline. SM

Major spillages shall be reported to the appropriate Environmental Regulator (EA / SEPA / NRW or statutory water undertaker) in addition to EcoOnline - advice should be sought from the Environmental Team prior to this being done. SM

Other incidents may require to be reported to external specialists such as the site ecologist, ECoW and archaeologist involved with the scheme.

Internal notification of environmental incidents, shall be handled in accordance with the requirements of form H07-02 *Local Accident & Incident Report*. SM

5.4 Training

All Company employees and subcontractors working on site shall be made aware of the E03-G01 *Environmental Incident Response Guidance* at induction and as a toolbox talk, ensuring an understanding of their role if an incident occurs. SM

To ensure the effectiveness of the plan, a mock spillage exercise should be carried out within 4 weeks of site start-up and at least every 6 months thereafter for the duration of the project. Records shall be kept of any mock spillage exercises including names of attendees and trainer. SM

6. ASSOCIATED GUIDANCE & INFORMATION

- E03-G01 *Environmental Incident Response Guidance*

7. DOCUMENTATION (OUTPUTS)

Standard VolkerWessels UK Record Documents are referenced in brackets. Where alternative formats are used, they shall contain the same or additional content.

- (E01-02 *Environmental Risk Assessment*)
- (E03-01 *Spill Kit Checklist*)
- (EMS-01 *Environmental Planning Meeting Agenda*)
- (H01-01 *Site Management Plan*)
- (H07-02 *Local Accident & Incident Report*)
- (HSE-60 *Health, Safety, Environmental and Quality Planning Meeting Agenda*)
- (Q60-03 *Environmental Start Up Meeting*)
- Method Statements

8. ISSUE RECORD

Issue	Date	Comments
1 - 5	Nov 2019	Please review 'Issue Record' Section in Issue 5 for a log of changes between Issue 1 and Issue 5.
6	May 2023	Procedure has been renamed and updated to introduce a Spill kit checklist. E03-G01 has been adapted to include various environmental incident responses. Title has been amended.

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9. WHAT HAS CHANGED IN THIS LATEST ISSUE AND WHY

Procedure has been renamed to incorporate incident response.

VolkerStevin document EM2-01-01 *Pollution Incident Response Plan* has been removed from the IMS and incorporated into E03-G01 *Environmental Incident Response Guidance*. This guidance now includes incident responses for various types of spills, discovery of invasive species, ecological discoveries, and damage to historic assets. Title has been updated to reflect this.

E03-01 *Spill Kit Checklist* has been introduced to ensure kits contain adequate items and are regularly checked.

10. BRIEFING REQUIREMENTS

All new employees will receive an introduction to the Integrated Management System (IMS) at induction, according to the nature of the role.

All employees with an email address receive the 'Record of Revisions' each month, which details changes to the IMS. All Line Managers retain the responsibility to ensure their staff are briefed on changes as appropriate.

The following table defines how revised issues of this document are briefed to existing employees according to related specific responsibilities.

Job role, department, function	Method of briefing revised issue
CR Director	CR Director is the document owner, approves changes, no briefing required.
All Employees	Record of Revisions and cascade briefings as appropriate.

11. IMS AUTHORISATION
Document owner approval:

Adrian Shah-Cundy, CR Director - 18.05.2023

Approval for IMS:

Andria Georgiou, IMS Coordinator - 18.05.2023

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