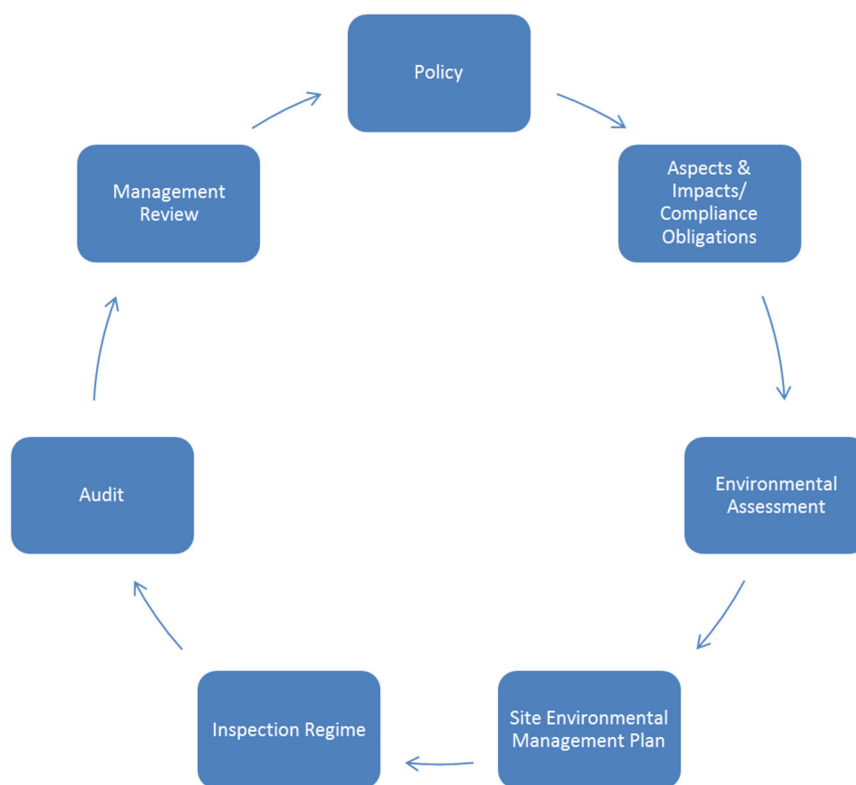


Summary of Environmental Management System

Tarmac Trading Limited (Tarmac) has in place an Environmental Management System (EMS) that is certified to the international standard: ISO 14001. The site will be operated under the overarching Core EMS which covers a number of Tarmac sites across the UK. The specific EMS procedures to support the operation of this type of regulated facility under an Environmental Permit in England have been developed with reference to relevant guidance¹ produced by the Environment Agency (EA). The EMS follows the Plan Do Check Act (PDCA) cycle as illustrated below:



A copy of the EMS will be held at the site and will be available for inspection once the site is operational following the issue of the Environmental Permit for the site. A summary of the key elements of the EMS is provided below.

¹ Environment Agency guidance “Developing a management system” and “control and monitor your emissions for your environmental permit” available on the GOV.UK website.

Company Environmental Policy

The EMS is underpinned by the company Environmental Policy which outlines its' high level vision, how it expects operations to be managed and its environmental performance to be communicated to its stakeholders and to enable the effective deployment of the related principles across its operational sites.

Tarmac is committed to preventing pollution of the environment as a result of its activities and the continual improvement of its environmental performance. Through a dedicated environmental and sustainability panel business objectives are developed. Environmental performance measures are also monitored by these forums and targets are set to enable performance levels to be continuously improved.

Tarmac aims to minimise the environmental impact of its activities by:

- regularly monitoring the effective deployment of the EMS through a series of graded audits
- prior to undertaking work on behalf of Tarmac, all sub-contract personnel will be made aware of site-specific environmental concerns and vulnerabilities through the site induction process
- reducing the amount of waste materials generated by their activities; attempting to recycle and reuse such materials wherever practical and where this is not achievable, disposing of such waste in a responsible manner
- seeking to use raw materials in an efficient manner, replacing them with substitute recycled raw materials where practicable and safe to do so
- promoting the efficient and reduced use of water, fuels and energy, thereby reducing carbon emissions and mitigating the potential for climate change
- purchasing, utilising and storing materials in a manner which poses minimal risk to both individuals and the environment, as far as is practical.

The EMS will be deployed effectively through the company's management organisation. Managers and employees will be assigned environmental responsibilities and will be expected to play a full and active part in managing the environmental aspects of the activities for which they have responsibility. Operational management will be supported by a team of competent advisors and performance will be monitored by environmental auditors.

Company Environmental Standards

All operational sites will be the subject of an Environmental Assessment and will maintain an up-to-date Site Environmental Management Plan (SEMP). This will identify specific activities and their potential impacts on the environment, enabling the site staff to implement the appropriate controls. The implementation and effectiveness of the controls are then supported by our audits which help to monitor compliance.

Waste treatment facility specific aspects

The following aspects have been identified having regard to the protection of the environment, compliance with any environmental permits and the highest standards of operation. These are in addition to the core company aspects described above.

The following aspects relevant to the waste treatment facility at Halecombe Recycling will be managed in accordance with any relevant company policies and procedures, site authorisations and statutory obligations.

1. Dust and particulate matter
2. Mud, litter and other debris
3. Noise
4. Security
5. Waste acceptance and rejection
6. Water management

Environmental Assessment

The site manager is responsible for the Environmental Assessment of the operations in normal and abnormal conditions, and for identifying the key environmental aspects of its activities. Through this process the aspects of the operations, that may have a significant impact on the environment can be identified and prioritised for corrective action and improvement together with an evaluation of legal compliance at the site. The site manager/supervisor, together with representatives from the site/area and the compliance and environmental permitting personnel identify and prioritise control measures relevant to the potentially significant environmental

impacts of the operations. The potential impacts most relevant to the site at Halecombe Recycling have been identified to be:

1. Biodiversity and ecological management
2. Visual impact
3. Dust
4. Fuel & chemical storage
5. Water monitoring and management
6. Legislation and documentation
7. Noise
8. Solid waste management
9. Vegetation management
10. Vibration
11. Traffic

Site Environmental Management Plan

The Environmental Assessment provides the prioritised potential significant environmental impacts for inclusion in the SEMP. The plan identifies objective(s) and target(s) for each significant impact and ensures that they are relevant to achieving the overall objectives of the Business Unit. The objective (the improvement action) is specific to the corrective/preventative action. The target for the improvement includes a date for completion, the person responsible for the action and verification of the completion by the authorising person. The SEMP is reviewed regularly and shall be consistent with legislation, environmental procedures and the Tarmac Environmental Policy. The SEMP may be updated at any time in order to implement changes/corrective actions identified by any management mechanism.

Each site undertakes all necessary monitoring and measurement of operational activities, as required by legislation, such as environmental permits and planning consents. All such monitoring and measuring information is documented and recorded on a monitoring schedule.

Site infrastructure plan

The Dust and Emissions Management Plan (DEMP) for the site includes plans of the site drawn to scale. The DEMP forms part of the EMS and as such the EMS includes a plan of the site drawn to scale.

Managing staff competence and training records

The site is run with sufficient staff and resources to ensure compliance with the permit. The SEMP identifies who is responsible for what procedures and who is technically competent. The SEMP identifies the roles and responsibilities for each of the managers, staff and contractors that relate to the activities covered by the permit. Staff and contractors are provided with the necessary training and undergo checks to ensure that they have the necessary qualifications required for the work they do and any training, refresher training and qualifications undertaken by the staff or contractors are suitably recorded.

Climate Change/ A changing climate

Consistent with the requirements of Environment Agency guidance² climate change adaptation planning is integrated into the Tarmac EMS. Consistent with the criteria set out in the guidance, the adaptation planning includes consideration of higher average temperatures (in summer and winter), more heat waves and hot days, rising sea levels, changes in rainfall and intensity and an increased frequency of storms. A Climate Change Adaptation Risk Assessment (CCARA) has been undertaken for Halecombe Recycling waste treatment facility to identify mitigation to plan for and minimise the potential of future impacts from climate change. A copy of the CCARA is held in the EMS.

² <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Environmental occurrence/non-conformance reporting system

An environmental occurrence/non-conformance reporting system is in place and has been developed in order to document, investigate and mitigate significant impacts on the environment and for initiating and implementing corrective and preventative action. All incidents are reported, whether or not an external person/agency is involved. Any system non-conformances are also documented for corrective and preventative action.

Contingency Plans

Consistent with the Environment Agency guidance, Tarmac have contingency plans in place for minimising the impact on the environment of any breakdowns, enforced shutdowns and any other changes in normal operations.

Accident prevention and management plan/Keeping records

Accident prevention and management plans are in place for dealing with any incidents or events that could result in pollution or could lead to non compliance with the permit. The plans identify potential accidents and identify the likelihood of each accident happening, the consequences of the accident happening, measures taken to avoid the accident happening and measures taken to minimise the impact if the accident should happen. The plans also include details of how incidents will be recorded, investigated and responded to including for breaches of the permit. The plan includes the date it was reviewed, date of next review, a list of emergency contacts and how to reach them, a list of substances stored at the site / storage facilities and forms to record the accidents on. The accident prevention and management plans are also covered by the environmental occurrence and non-conformance reporting system mentioned above.

Inspection regime and audit

The Environment Manager establishes and monitors an annual inspection programme ensuring that all sites are audited by an independent manager who has no responsibility for the site. The auditor completes an associated audit summary sheet, agreeing and summarising as necessary a list of recommended actions in consultation with the site manager. The audit summary sheet is then included in the SEMP and priorities and

timescales are assigned. A date for a follow-up visit to ensure close out of any actions has been completed is set up by the visiting auditor and the manager/supervisor. The follow up visit is also be used to ensure previous actions are continuing to work and are effective.

Complaints procedure

A complaint procedure is in place to record any complaints that the site receives in relation to activities covered by the permit, how the complaints are investigated and any actions taken because of the complaints. Tarmac are committed to taking complaints seriously and will endeavour to ensure that they are investigated thoroughly and respectfully.

Management Review

There is a tiered review of the EMS at top management level, local area level and at site management level including the procedures, environmental policy and the objectives and targets for the company in order to support its ongoing effectiveness, suitability, adequacy and stability.