



Standard Work Procedure 019 Environmental Management System Manual.

Relevant Management Systems	Quality 9001	Environmental 14001	Health & Safety 18001
	X	X	X

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Towens of Weston Ltd

Towens Waste Management Ltd

Environmental Management System Manual

Document title	Environmental Management System Manual	Revision Number	006
Document reference	SWP019	Date	June 2021
Prepared By	Amandine Lenfant	Sign Off	John Telling



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1. Scope

This manual forms the basis of the Environment Management System (EMS) for all sites under the control of Towens Waste Management Ltd (TWM) and Towens of Weston Ltd (TOW).

The overarching aim of this management system is to ensure that the business can fulfil its purpose, stay legally compliant, and maintain social responsibility by way of meeting the objectives set by our Environmental Policy and therefore enhancing and protecting the environment and we aim to continually improve year on year.

Towens Environmental Policy is endorsed by the board of directors and signed by the companies' Managing Director. It is communicated to all employees and is publicly available to interested parties.

The EMS is integrated within all business systems to ensure all processes are controlled and carried out as planned, throughout the year, in accordance with environmental protocol.

The main purpose of both TOW and TWM is to provide a waste management service to customers, which consists of the collection, treatment, storage, transfer and disposal of waste. Our waste management activities can be summarised as the following:

- Delivering skips and then taking them away once the customer has filled it with waste. These skips will then go back to one of our sites for sorting, treatment or transfer onwards for further recycling, treatment or disposal
- Customers bring their waste direct to several transfer station in Weston-Super Mare, Clutton or Middlezoy, where it is sorted, treated or transferred onwards for further recycling, treatment or disposal
- We provide haulage to our own or another sites (with both tipper and artic lorries)

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- We treat hazardous road planings containing coal tar with solidification and stabilisation
- We treat fuel contaminated soils with bio-remediation

In addition to waste management, we also provide:

- Vehicle maintenance in our own purpose-built garage (Towens Fleet Services Ltd)
- Groundworks and earthworks
- Haulage

The nature of these activities, any ancillary aspects and services we provide, including any influence we have over suppliers, customers and peers, is also included within this management system. Our ability to exercise control and / or influence over customers and interested parties varies but environmental consideration will be prioritised wherever practicable.

TOW and TWM EMS arrangements are consistent with the requirements of the internationally recognised standard for environment management systems, ISO14001.

Doc Ref: Towens Group Environmental Policy

2. Normative references

This is not applicable to the standard

3. Terms and Definitions

Audit

An audit is an evidence gathering process. Evidence is used to evaluate how well audit criteria are being met. Audits must be objective, impartial, and independent, and the audit process must be both systematic and documented. Audits can be either internal or external.

Internal audits are referred to as first-party audits while external audits can be either second or third party. They can also be combined audits (when two or more management systems of different disciplines are audited together at the same time).

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Audit evidence includes records, factual statements, and other verifiable information that is related to the audit criteria being used. Audit criteria may be thought of as a reference point and include policies, requirements, and other forms of documented information. They are compared against audit evidence to determine how well they are being met. Audit evidence is used to determine how well policies are being implemented and how well requirements are being followed.

Communication

Communication is the imparting or exchanging of information by speaking, writing, or using some other form medium.

Competence

Competence means being able to apply knowledge and skill to achieve intended results. Being competent means having the knowledge and skill that you need and knowing how to apply it. It means that you're qualified to do the job.

Conformance Obligation

A conformance obligation is a requirement. There are two kinds of conformance obligations: mandatory conformance obligations and voluntary conformance obligations. Mandatory conformance obligations include laws and regulations, while voluntary conformance obligations include contractual commitments, community and industry standards, ethical codes of conduct, and good governance guidelines. A voluntary obligation becomes mandatory once you decide to comply with it.

Conformity

To conform means to meet a requirement (or a conformance obligation). Since there are many kinds of requirements, conformity can take many forms. You can conform (or comply) with mandatory requirements like laws and regulations or with voluntary requirements such as contracts, agreements, codes, and standards.

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Context

An organization’s context is its business environment. It includes all of the issues, factors, and conditions that could influence or be influenced by an organization's environmental management system.

Continual Improvement

In the context of an EMS standard, continual improvement is a set of recurring activities that organizations use to enhance their environmental performance. Environmental performance is enhanced whenever the environmental aspects of activities, processes, products, services, and systems are controlled and whenever adverse environmental impacts are reduced and beneficial environmental impacts are produced.

Corrective action

Corrective actions are steps that are taken to prevent recurrence by eliminating the cause or causes of an existing nonconformity. The corrective actions process tries to make sure that existing nonconformities don’t happen again.

Documented Information

The terms documented information refers to information that must be controlled and maintained and its supporting medium. Documented information can be in any format and on any medium and can come from any source.

Documented information includes information about the environmental management system and related processes. It also includes all the information that organisations need to operate and all the information that they use to document the results that they achieve (aka records).

Effectiveness

Effectiveness refers to the degree to which a planned effect is achieved. Planned activities are effective if these activities are actually carried out and planned results are effective if these results are actually achieved.

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Environment

The term environment refers to organisations’ natural and human surroundings. An organisations environment extends from within the organisation itself to the global system and includes air, water, land, flora and fauna (including people), and natural resources of all kinds.

Environmental condition

Environmental conditions are states or characteristics of the environment at a particular point in time.

Environmental Impact

An environmental impact is a change to the environment that is caused either partly or entirely by one or more environmental aspects. An environmental aspect can have either a direct and decisive impact on the environment or contribute only partially or indirectly to a larger environmental change. In addition, it can have either a beneficial environmental impact or an adverse environmental impact.

Environment Management System

An environmental management system (EMS) is a set of interrelated or interacting elements that organisations use to implement their environmental policy, to achieve their environmental objectives, to meet their environmental conformance obligations, to manage their environmental aspects, and to address their environmental risks and opportunities.

These elements include structures, programs, procedures, processes, practices, plans, rules, roles, regulations, responsibilities, relationships, contracts, agreements, documents, records, methods, tools, techniques, technologies, and resources.

Environmental Objective

An environmental objective is an environmental result than an organisation intends to achieve. The organisations objectives should be based on or derived from its environmental policy and must be consistent with this policy.

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Environmental Policy

A policy is a commitment, directions, or intention and is formally stated by the top management or an organisation. An environmental policy should make a commitment to protect the environment, to meet all relevant conformance obligations, and to enhance environmental performance.

Indicator

An indicator is a measurable representation. It is used to indicate or measure the status or condition of an operation or an activity. In the context of this standard, indicators can be used to quantify and evaluate environmental performance. They can be used to measure how much success you've had and how much progress you've made relative to the environmental objectives you wish to achieve and the environmental policy you wish to implement. Indicators can also be used to monitor trends and to support decision making.

Interested party

In general, an interested party is any person, group, or organisation who can affect, be affected by, or believe that they are affected by a decision or activity. In the context of this standard, an interested party is anyone who can affect, be affected by, or believe that they are affected by the environmental performance of an organisation.

Issues

Issues can be external or internal, positive or negative and include environmental conditions that either affect or are affected by the organisation.

Leadership

Requirements specific to top management to establish a clear vision, share that vision with others, provide information and knowledge to realise that vision, coordinate and balance the resources to be able to achieve the vision and balancing the conflicting interests of all members and stakeholders. A leader steps up in a time of crisis or a difficult situation.

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Life cycle

In the context of this standard, the term life cycle refers to the consecutive and interlinked stages of a product system from the acquisition of raw materials to end-of-life disposal. The life cycle of a product system includes all associated activities, products and services and may include procured goods and services as well as end-of-life treatment, decommissioning and disposal.

Measurement

Measurement is a process that is used to determine a value.

Monitoring

To monitor means to determine the status of an activity, process or system at different stages or at different times. In order to determine status, you may need to supervise and to continually observe and check the activity, process, or system that is being monitored.

Nonconformity

Nonconformity refers to the “non-fulfilment of a requirement”. When an organisation fails to meet a requirement, a nonconformity exists. Since there are many kinds of requirements, nonconformities can take many forms e.g. fail to conform (or fail to comply) with mandatory requirements like laws and regulation, or with voluntary requirements such as contracts, agreements, codes, standards or processes.

Objective

An objective is a result you intend to achieve. Objectives can be strategic, tactical, or operational and can apply to an organisation as a whole or to a system, process, project, product, or service. Objectives may also be referred to as targets, aims, goals, or intended outcomes.

Organisation

An organisation can be a single person or a group that achieves its objectives by using its own functions, responsibilities, authorities, and relationships. It can be a company, corporation, enterprise, firm, partnership, charity, or institution and can be either incorporated or unincorporated and be either privately or publicly owned. It can also be an operating unit that is part of a larger entity.

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Outsource

When an organisation makes an arrangement with an outside organisation to perform part of a function or process, it is referred to as outsourcing. To outsource means to ask an external organisation to perform part of a function or process normally done in-house. While the outsourced organisation is beyond the scope of our EMS, the outsourced process or function itself may fall within the scope.

Performance

According to ISO, the term performance refers to a measurable result. It refers to the measurable results that activities, processes, products, services, systems and organisations are able to achieve. So whenever processes, products, services, systems, or organisations perform well it means that acceptable results are being achieved.

Prevention of pollution

To prevent pollution means to avoid, reduce, or control the creation, emission, or discharge of contaminants or waste materials. Pollution must be prevented in order to reduce adverse environmental impacts. A variety of methods, techniques, practices, process, products and services can be used to prevent pollution. These include the reduction or elimination of pollution at the source; the efficient use of resources, materials and energy; the reuse, recovery, reclamation, and recycling of resources; the redesign of processes, products, and services; and the substitution of one type of energy source or substance for another cleaner energy source or substance.

Procedure

A procedure is a way of carrying out a process or an activity. Procedures may or may not be documented.

Process

A process is a set of activities that are interrelated or that interact with one another. They transform inputs into outputs. Processes are interconnected because the output from one process often becomes the input for another process.

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Requirement

A requirement is a need, expectation, or obligation. It can be stated or implied by an organisation, its customers, or other interested parties. A specified requirement is one that has been stated (in a document for example), whereas an implied requirement is a need, expectation or obligation that is common practice or customary.

Risk

Risk is the effect of uncertainty and an effect is a positive or negative deviation from what is expected.

Risk is often expressed as a combination of two factors: probability and consequences. It asks two questions: what is the probability that a potential event will occur in the future? And what consequences would this event produce or what impact would it have if it occurred?

Risks and Opportunities

Risks are potential adverse effects (or threats) and opportunities are potential beneficial effects.

Top Management

The term Top Management normally refers to the people at the top of an organisation. It refers to the people who provide resources and delegate authority and who coordinate, direct, and control organisations. However, if the scope of a management system covers only part of an organisation, then the term Top Management refers, instead, to the people who direct and control that part of the organisation.

4. Context of the Organisation

Towens have identified and understand the factors and parties that can affect, either positively or negatively, the EMS. This includes understanding the internal and external issues and environmental conditions that could influence our EMS and the results that it intends to achieve.

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4.1 Understanding the organisation and its context

Both TOW and TWM recognise that a plethora of things can have the ability to affect not only our companies’ purpose but also our capability to achieve the intended outcomes of our environmental management system. We also recognise that that we can affect them. The factors we have taken into consideration include:

Environmental Conditions

- Climate
- Air quality
- Water quality
- Land use
- Existing contamination
- Natural resource availability
- Biodiversity

External conditions

- Cultural
- Social
- Political
- Legal
- Regulatory
- Financial
- Technological
- Economic
- Natural and competitive circumstances

We have also considered whether all of the above could be International, National, Regional or Local

Internal Conditions

- Activities
- Products
- Services
- Strategic direction

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Culture
 Capabilities (people, knowledge, processes, systems).

Doc Ref: SS007 Aspects and Impacts register

4.2 Understanding the needs and expectation of interested parties

We recognise that interested parties form part of the context in which our organisations operate. We understand that in order to form a good working relationship with them, we must first identify who they are and understand what their expectations are of us and what we can expect from them. We have considered both internal and external interested parties and have considered the following:

- Employees
- Contractors
- Clients / Customers
- Suppliers
- Regulators
- Shareholders
- Neighbours

We have then considered their expectations and interested by relationship, which can be summarised as either:

- By responsibility
- By Influence
- By proximity
- By dependency
- By authority

Doc Ref: STOF06 Supplier 14001 questionnaire

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4.3 Determining the scope of the environmental management system.

The overarching aim of this management system is to ensure that the business can fulfil its purpose, stay legally compliant, and maintain social responsibility by way of meeting the targets sets by our Environmental Policy and therefore enhancing and protecting the environment.

Towens Environmental Policy is endorsed by the board of directors and signed by the companies’ Managing Director. It is communicated to all employees and is publicly available to interested parties.

The main purpose of both TOW and TWM is to provide a waste management service to customers, which consists of the collection, treatment, storage, transfer and disposal of waste. Our waste management activities are summarised on pages 2 and 3 of that document.

4.4 Environmental Management System

Towens will implement, maintain and continually improve a management system in order to achieve its intended outcomes, including enhancement of environmental performance, conformance and improvement.

The management system will be an integral part of the business and will drive more meaningful analysis of key business processes and critical aspects of the processes. In practical terms, this means that it will require Towens to more fully analyse its processes and ensure that there is a good understanding of how they interact with each other and not operate as isolated procedures with overlap

5 Leadership

The top management at Towens, whom direct and control the organisation, will demonstrate leadership and commitment by integrating this management system into business processes. Towens management have committed to having a greater involvement in the management system and will establish an Environmental Policy as part of this commitment. They have also commitment

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to continual improvement of the management system and will ensure that the EMS is communicated, maintained and understood by all parties.

5.1 Leadership and commitment.

Top management shall demonstrate leadership and commitment by:

- Taking accountability for the effectiveness of the EMS. This is through the approval of objectives, the policy and identifying significant aspects in decision making
- Ensuring the environmental policy and objectives are established and are compatible with the strategic direction of the organisation.
- Ensuring integration of the EMS into the companies’ business processes.
- Ensure appropriate resource is available.
- Communicating the importance of an effective EMS and conforming to the requirements.
- Directing and supporting people who contribute to the effectiveness of the EMS.
- Promoting continual improvement through management programs, objectives and innovations.
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility i.e. Maintenance, Site Managers, Transport managers.

5.2 Environmental Policy

Directors shall establish, implement and maintain an environmental policy that, within the defined scope of the EMS, discusses context (nature, scale and environmental impacts, products, services); provides a framework for setting objectives; includes a commitment to protect the environment; includes a commitment to fulfil conformance obligations and includes a commitment to continually improve.

Doc Ref: Towens Environmental Policy

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5.3 Organisational roles, responsibilities and authorities

Top management shall ensure that the responsibilities and authorities of relevant roles are assigned and communicated within the organisations.

The Environmental & Compliance Manager is responsible for overseeing the EMS and reporting performance to the Directors. This is done through monthly reports, periodic meetings and / or other communications.

The site environmental organisation is represented by a flow diagram that clearly shows lines of departmental responsibility and managerial hierarchy

Doc Ref: DP002 Organisational chart.

Doc ref: SSF002 Key staff and contacts

6 Planning

The following sections outline some of the main responsibilities with regards to the running of the EMS.

6.1 Actions to address risks and opportunities

6.1.1 General

Towens will establish, implement and maintain processes in order to:

- Mitigate the impacts that were highlighted on the Aspects and Impacts Register.
- Be able to take full advantage of all opportunities identified, and mitigate against all risks identified on the Risks and Opportunities register.
- Consider potential emergency situations, which could arise and constitute risk.
- Consider all conformance obligations, maintain conformance and keep up to date on all relevant legislation and conformance obligations.
- Maintain a high calibre of staff by addressing training needs.
- Continually improve environmental performance.

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6.1.2 Environmental Aspects

An environmental aspect is “An element of an organisations activities, products or services that can interact with the environment”. An Environmental Impact is “Changes to the environment, either adverse or beneficial, that result wholly or partially from environmental aspects”.

Towens identify all significant aspects and associated environmental aspects so that we can see where control or improvement is needed and to be able to set priorities for management action. Our policy, environmental objectives, training, communications, operational controls and monitoring processes are all developed with knowledge based on our significant environmental aspects.

Understanding activities, products and services

Towens acknowledge that all activities, products and services have some impact on the environment, which can occur at any or all stages of the lifecycle i.e. from raw material acquisition and distribution, to end use and disposal.

Determining environmental aspects

A procedure has been established to identify all the environmental aspects associated with the activities, products and services that can be influenced or controlled by Towens Group of companies. In addition to those environmental aspects that we can control directly, we have also considered aspects that we can influence e.g. Those related to products and services we use and those related to products and services we provide.

This procedure is to ensure we consider our ability to influence with regards to our conformance obligations as well as local and companywide policies. It also ensures we consider the implications on our own environmental aspects by giving consideration to the following:

- Purchasing of products
- Activities carried out by external providers
- Design of products and services

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- Materials, goods or services supplied
- Transport, use, reuse or recycling of products placed on the market.

Doc Ref: SWP013 Identifying and assessing aspects and impacts.

Doc Ref: DP001 WSM Site plan.

Doc Ref: DP003 Site Plan Middlezoy

Doc Ref: DP004 WSM Sump plans

Determining environmental Impacts

All aspects that have, or can have, significant environmental impacts are determined through a risk assessment process and these are considered in the process of determining objectives and targets. Significant risks are documented on the form along with whether the aspect has a site, lifecycle perspective or interested party connotation.

When considering environmental impacts, Towns shall take into account changes or modified activities, services and products and ad normal conditions / reasonably foreseeable emergency situations.

Doc Ref:

- SS007 Aspects and Impacts register
- SWP008 Waste acceptance
- SWP012 Waste rejection and tipping of non permitted waste
- STOF32 Waste Rejection Information Form
- SWP063. Hot loads
- SWP010 Waste enquiry recording
- SS011 Waste Enquiry Recording (Electronic)
- SWP055 Emergency highway works
- SWP057 Hazardous waste consignment notes
- LTR001 Consignee return to customer letter
- LTR002 Consignee return to Towns letter
- SS013 Consignment note numbers and templates (Electronic)

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6.1.3 Conformance obligations

When determining our conformance obligations, we have given consideration to regulatory conformance, which is mandatory, but also to other voluntary agreements:

New scoring system - EA – Above and beyond

Any vehicle / fleet ones?

Towens believe that it is only by considering the above, that we can fully understand our conformance obligations.

Towens have established a procedure to identify all environmental legislation, regulatory and other requirements (Including those of interested parties) that are applicable to the companies. This procedure ensures that information is kept up-to-date and that we can accurately monitor our conformance

6.2 Environmental objectives and planning to achieve them.

6.2.1 Environmental Objectives

In order to meet the policy requirement of continual improvement, Towens have established environmental objectives at each relevant function and level within the organisations. Objectives take into consideration the following:

- Significant environmental aspects
- Technological options
- Financial, operational and business requirements
- Views of interested parties
- Top management goals

The objectives are consistent with the environmental policy, measurable (when applicable), monitored, communicated to all members of staff and updated as appropriate.

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6.2.2 Planning actions to achieve environmental objectives

The Significant Aspect Action Plan and management meetings have been set up to ensure that the objectives are achieved. The program includes:

- Roles and responsibilities for achieving each objective.
- The timescales for their completion.
- The process involved.
- Resources needed.
- Setting priorities.
- Evaluating results.

7. Support

7.1 Resources

Top management at Towens will make a commitment to provide the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system – covering all aspects of people and infrastructure. This includes maintaining organisational knowledge to ensure the organisation understands internal and external knowledge needs as well as providing a commitment to ensure management of resources, including effective succession planning for personnel.

Directors

Will ensure the relevant resources are available to establish, implement, maintain and continually improve the EMS and appoint an Environmental & Compliance Manager to manage the system. The Directors will review the EMS on a periodic basis to ensure its continuing suitability, adequacy and effectiveness.

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Environmental & Compliance Manager

The Environmental & Compliance Manager will:

- Ensure that the EMS requirements are established, implemented and maintained.
- Report in the performance of the EMS to the Directors for review and as a basis for improvement to the EMS
- Communicate the requirements and performance of the system to all employees

Audit Team

Towens will train and retain a group of people to carry out internal audits. Between the members of this team, all sections of the EMS will be audited annually.

All employees

All employees have responsibility for environment management. Key environmental responsibilities are outlined during employee induction training. Individuals directly involved with running and / or recording data relevant to the EMS are listed in the Responsibility column of the Measuring and Monitoring Table, see section 9.

7.2 Competence

All employees will receive basic environmental awareness training as part of their induction. The induction training will cover:

- Environmental Policy
- Conformance to environmental procedures and work instructions.
- The employee’s role and responsibility in the operation of the EMS.
- Emergency plan.

Doc Ref: SSF003 Site induction form
SWP002 Environmental Guide for working in the office

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Employees will receive further training, as required, to ensure they are competent in any additional roles or extra duties they are required to be involved in / responsible for.

Towens have a training matrix which shows all staff, the relevant training requirements, dates training took place and expiry dates of any training received.

Doc Ref: SS004 Training Matrix (Confidential)

7.3 Awareness

By adhering to the communication procedure, Towens will ensure that all personnel are aware of the environmental policy, significant aspects and impacts of relevance to their activities, how they contribute to the environmental objectives, environmental performance and conformance obligations, and the implications of failures in conformance.

7.31 Awareness of contractors

Towens will ensure that persons doing work under the organisations control are aware of:

- The environmental policy
- Significant environmental aspects related to their work
- Their contribution to the effectiveness of the EMS
- The implications of not conforming to the site rules.

7.4 Communication

7.4.1 General

Towens will establish, implement and maintain processes needed for internal and external communication relevant to the EMS. The communication procedure sets out what will be communicated, when to communicate, to whom we communicate and how to communicate. It also

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details, where necessary, how the communications should be documented, recorded and kept.

Doc Ref: SWP015 Communication procedure

7.5 Documented Information

7.5.1 General

Management system hierarchy is as follows:

1. Environmental Policy
2. Environment manual
3. Environmental procedures / work instructions
4. Environmental documented information

The manual contains references to all related environmental documentation, including the environmental procedures and work instructions that are required by the standard and what is deemed necessary by the company for effectiveness of the EMS.

7.5.2 Creating, Updating and controlling documents

Towens have established procedures for controlling documents required for the operation of the EMS. This procedure will ensure that documents are:

- Identified and described
- Reviewed and updated as necessary are re-approved.
- The relevant versions of documents are available at locations where activities are performed.
- Obsolete documents are removed from all points of issue and use, or otherwise controlled to prevent unintended use.
- Formatted appropriately.
- Documented information is retained for the relevant time periods.

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Document reference	SWP019	Date	June 2021
Prepared By	Amandine Lenfant	Sign Off	John Telling



Standard Work Procedure 019 Environmental Management System Manual.

Relevant Management Systems	Quality 9001	Environmental 14001	Health & Safety 18001
	x	x	x

Controlled Document

- Doc Ref: SWP077 Document control
- Doc Ref: SWP081 Using headers and footers in Word
- Doc Ref: SWP083 Using headers and footers in Excel
- Doc Ref: SS003 Track changes (Electronic)

8. Operation

8.1 Operational planning and control

Towens recognise that having operational control is essential to control and mitigate our environmental impact. To achieve this, we have constructed processes and whilst doing so, we have considered the following features:

- Existing internal processes and what others are needed.
- Our environmental objectives
- Life cycle of a product
- Product Quality
- Available technology
- Legal responsibility
- Personnel competency and training requirements
- Monitoring, measuring and analysis.
- The amount of documented information needed to support our aims and objectives
- Legal and conformance requirements
- Internal and external parameters, interested parties and processes.
- Opportunities for improvement

- Doc ref: SWP054 Registering a waste exemption
- Doc ref: SWP072 General dust control
- Doc ref: SWP073 Third party site waste management plans
- Doc ref: SSF024 Template Waste Management Plan
- Doc ref: SSF026 Warne Road combines site diary
- Doc Ref: SSF027 Clutton site diary
- Doc Ref: SSF029 Middlezoy site diary
- Doc Ref: SSF030 Huntworth site diary
- Doc Ref: STOF15 Treatment and sampler record bioremediation

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- Doc Ref: STOF18 Liability acceptance AWCCT
- Doc Ref: SWP010 Waste Enquiries
- Doc Ref: SWP040 Maintenance
- Doc Ref: SSF018 Plant Inspection Form
- Doc Ref: SWP057. Producing consignment notes
- Doc Ref: SWP065 Method Statement of production
- Doc Ref: SSF001 Waste Information Form
- Doc Ref: SWP014 Soil Acceptance for Burnham and Berrow recovery
- Doc Ref: SOF003 Soil Acceptance Form

In addition, the following Environmental Permits and consents form part of this section:

- EPR/KB3432RR Clutton Waste Transfer Station
- EA/WML/26054 Weston Waste Transfer Station (and accompanying SWP018 WMP)
- EPR/EB3636RB Weston Treatment Permit
- EP/B/QCS14/14 Towns of Weston Crushing Permit
- EPR/DB3605UJ Middlezoy Transfer Station Permit
- EPR HB3004KS Westonzoyland Treatment Facility
- Consent 101609. Consent to discharge, Middlezoy (And transfer notice)
- Consent 50892. Wessex Water trade effluent consent to discharge.

The standard requires that external and outsourced processes must be defined and controlled and so when planning to control this, we have considered:

- Resources, knowledge and training/competence.
- The ability of the provider to meet the EMS objectives.
- The potential effect of the product or service on environmental aspects
- How control is shared between the parties.
- How control is achieved through the procurement process

Doc Ref SWP016 Supplier performance monitoring

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- Doc Ref SWP003 Supplier assessment
- Doc Ref SWP006 Spillage procedure
- SWP004 Spill Kit stock check
- SWP005 Spill Kit Instructions
- Doc Ref EP002 Fire prevention plan Warne Road
- Doc Ref EP004 Fire prevention plan Middlezoy
- Doc Ref EP007 Fire prevention plan Westonzoyland
- Doc Ref EP008 Fire prevention plan Clutton
- Doc Ref HSP076 COSHH (Kept in COSHH File)

8.2 Emergency preparedness and response

Towens have a procedure for responding to accident and emergencies situations. This will help prevent and mitigate any negative environmental impacts associated with them. Potential emergency situations may be identified using our Non-conformance Preventative Action Procedure and this will lead to the updating of the Emergency plan.

- Doc Ref: EP003 Warne Road Emergency plan
- Doc Ref EP004 Middlezoy Emergency Plan
- Doc Ref EP010 Westonzoyland Emergency Plan
- Doc Ref EP008 Clutton Emergency Plan

9. Performance evaluation

9.1 Monitoring, measuring, analysis and evaluation

9.1.1 General

Towens are dedicated to ensuring that the EMS is effective. This includes a commitment to regularly monitor, measure and analyse results in order to continually improve.

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9.1.2 Evaluation of conformance

A procedure has been established to monitor and measure key characteristics of Townens operations that have a significant impact on the environment.

We have determined what needs to be measured, the methods used and the criteria to measure against. We ensure that only calibrated equipment is used and that performance is appropriately communicated both internally and externally, especially with reference to conformance obligations.

- Doc Ref: SWP066 Monitoring and measuring procedure
- Doc Ref: SS015 Monitoring and sampling calendar
- Doc ref: SWP067 Effluent monitoring
- Doc ref: SWP076 Mud and debris on the highway
- Doc ref: SWP007. Factory Production Control
- Doc Ref: SWP009. Sales document for aggregate
- Doc Ref: SWP056 Stockpile sampling
- Doc Ref: SS002 Aggregate Production log (Electronic)

9.2 Internal audits

9.2.1 General

The EMS and associated procedures will be audited on a sufficient frequency to ensure the system confirms to the ISO standard and has been properly implemented and maintained.

9.2.2 Internal audit programme

As well as auditing all aspects of the EMS, the audit plan also includes regular auditing of legal conformance, with a particular emphasis on Environment Permits, regulated by the Environment Agency. An audit programme is in place which states the frequency, methods, responsibilities and reporting of its audits. Ad-hoc audits are also carried out and are recorded on an ad-hoc inspection sheet.

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- Doc Ref: SS005 Internal audit plan
- Doc Ref: STOF22 Audit report form
- Doc Ref: SSF007 Ad-hoc inspection form
- Doc Ref: STOF33 WSM Transfer station audit for permit conformance
- Doc Ref: STOF34 WSM Treatment yard audit for permit conformance
- Doc Ref: STOF35 Clutton audit for permit conformance
- Doc Ref: STOF36 Middlezoy audit for permit conformance

9.3 Management Review

The EMS will be reviewed by Directors on an annual basis to ensure it continues to be suitable, adequate and effective. This process will include reviewing the companys’ Environmental Policy, as well as ensuring the EMS meets the requirements of the policy and is at the standard as laid down in ISO14001:2015. The review will be used to assess resources to ensure we have enough resource in place to achieve our aims and objectives.

- Doc Ref: SWP021 Director review
- Doc ref: SWP011 Environmental Policy

10. Improvement

10.1 General

Towens will determine opportunities for improvement and implement necessary actions to achieve intended outcomes of the EMS.

10.2 Nonconformity and Corrective Action

A procedure has been established to ensure that any environmental non-conformance shall be investigated and recorded. For each incident of non-conformance, corrective and/or preventative actions shall be undertaken and will be appropriate to the magnitude of the problem and commensurate with any actual or potential impact encountered.

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Doc Ref: SWP001 Non-conformance and preventative action procedure.

Doc Ref: SOF001 Non-conformance Report form

Doc Ref: SS006 Non-conformance log (Electronic)

10.3 Continual Improvement

Towens will continuously improve the suitability, adequacy and effectiveness of the EMS to continually improve the system and improve environmental performance. This is achieved through:

- Setting objectives and annual targets
- Measuring and monitoring, including regular auditing
- Recording findings and acting on non-conformances
- Maintaining and updating knowledge and competencies
- Monthly environment meetings

Doc Ref: STOF04 Environment Monthly Management Review

Doc Ref: STOF021 Environmental Ideas, comments, suggestions

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