B2-1: We had received various advice – most recent communication was with Matt Robinson from the Pre-application team – reference: JH Metals Limited / EPR/KB3702UB/A001

B2-2: JH Metals Ltd.’s environmental management system had been assessed and registered by NQA against the provisions of ISO 14001: 2015 in March 2022 – Certificate No: 176112. All documentation in relation to the EMS was up to the standards of the ISO14001, in which will be monitored by NQA and management at JH Metals will ensure that it is maintained. All relevant documentation in relation to the EMS is accessible and up to date.

**Site operations-** Our management system includes procedures for site operations, to allow personnel to have a clear understanding of work activities and how to prevent risks to the environment from their actions. When vehicles are delivered on site, the office requests for all the relevant paperwork, including the driver’s proof of identification.

* Only vehicles destined for ELV treatment will be accepted and all vehicles are checked on arrival for contaminants (e.g. rubbish in the boot). If accepted, a copy of the written receipt/ waste transfer note/ consignment note will be given to the customer.
* Vehicles and any parts & fluids removed are accounted for throughout the processing cycle (e.g. registration no’s of vehicles obtained, numbers/day, where they are in the processing life cycle, level of fluids kept on site).
* The quality of output is checked for vehicles (e.g. no fluids, batteries, tyres). All fluids extracted are retained in extracted. ISO 14001:2015 EMS system used to manage process based environmental risks.
* Waste is segregated at all times and hazardous waste is never mixed. Waste is never mixed together during storage and when sent on for onward processing.
* Waste is kept on site in accordance with waste exemption – WEX254606. For all waste piles, the maximum height allowed is 4m and length/ width allowed (whichever is the longest) is 20m.

The fire prevention plan considers management actions to ensure that fire precautions in place to create a safe workplace for both the environment and workers on site. It is vital these plans are implemented and there is concern and procedures in place regarding physical conditions within the premises, which are designed to facilitate containment of potential fire by the design and layout, effective communication, and safe evacuation.

*Please see – NQA 14001 Certificate & Fire prevention Plan*

**Site and equipment maintenance plan-**

All site machinery equipment, including vehicles and plant are maintained correctly to minimise fumes and noise. Plant, machinery, or vehicles are not kept running idle when they are not in use and it is ensured acoustic coves are kept shut.

The vehicles on site and the forklift have regular services and reports to ensure that it is in great working order and if there are any issues they can be fixed. The site’s forklift is serviced regularly to be checked for any faults which is then reported. Any matters will be stated in the report, to be resolved. The Site’s vehicles have yearly services and MOT’s to ensure they are kept in great working order, and drivers are responsible to complete a daily defect sheet, to safeguard that the vehicle in use has no faults.

The site is kept very tidy, housekeeping is kept up to date to ensure a safe and tidy workspace (yard is swept daily, office tidy) and checklist’s are completed quarterly. Appropriate procedures are in place to

manage a safe working environment to prevent damage to the environment, an aspects and impacts register is in place to reduce any risks.

**Contingency Plans-**

The aspects and impacts register covers all possible risks to the environment, how they can be prevented and procedures that are in place to reduce concerns. For example, any vehicles that are inadequately contaminated when brought to the yard are not accepted, absorbent granules are at all times, and the site is protected by concrete paving and interceptor tanks.

It is vital that if there are any changes to the management of the site, including new work activities etc. then the aspects and impacts register is re-assessed so that all new potential risks are covered.

**Accident prevention and management plan-**

JH Metal’s activities will impact the environment and hence JH Metals gives environmental issues the highest priority. As a minimum standard JH Metals will undertake its actions in accordance with all its current and applicable compliance obligations such as legal and contractual requirements as well as those it may voluntarily subscribe to such as ISO 14001. JH Metals is committed to the continual improvement of its environmental performance through the use of its environmental management system and will ensure pollution is prevented and the environment is protected, and not exposed to harm as a result of its undertakings.

In its planning and decision-making JH Metals will take due care of the environmental impact of its activities. JH Metals will control harmful emissions to the environment, by dealing safely with contaminated materials and all other waste materials taking care to protect the environment.

A fire prevention plan is in place to identify all potential risks that could affect site operations, as well as an Environmental policy that will reviewed and updated to reflect future developments and will be made available to any interested party on request. Procedures are developed through information, instruction, and training, to continuously improve environmental awareness. This includes documents such as accident and emergency procedure, emergency preparedness, fire prevention plan, strategy document and legal register.

Our document and data control includes all information relating to record keeping ensuring that all changes to documents are made in a consistently recorded manner and records are retained appropriately. Documents and records are maintained in order to demonstrate the effective operation of the Integrated Management System and that work has been carried out correctly.

**Changing Climate-**

The emergency preparedness document covers different emergency procedures, including flooding which could occur due to extreme rainfall. To ensure flooding does not impact negatively, appropriate processes are in place to manage expected surface water and flood waters, drainage systems on site are inspected and maintained.

Particularly during summer months, it is important that protection is in place to avoid sources of heat which could lead to risk of fire: waste is shaded from direct sunlight, waste is monitored more frequently than usual – temperature checked etc, storage times are kept to a minimal – waste turnover is speedier where applicable, the site layout is re-arranged where appropriate and if reflective surfaces are identified, they are relocated or covered to prevent direct sunlight reflecting onto waste.

**Complaints-**

Within the strategy document, it covers how we operate in relation to group opinions that matter to us. We ensure that work undertaken in the yard is not to impact on them (e.g. nuisance, pollution) and cause any issues to give them problems (e.g. polluting the local canal, traffic queues causing congestion in the access roads).

For example, customers (general public and companies) want to ensure they are working with credible organisations to protect their own reputation. Hence environmental awareness and performance is important for them to feel secure dealing with JH Metals.

The complaints procedure is used to record any complaints that have occurred, how they have been investigated and actions that have been taken to resolve.

**Managing staff competence and training records-**

JH Metals management system involves plenty of information to ensure staff are fully aware of their job roles and responsibilities. All members of staff are given all procedures and we ask for a signature to show receipt and understanding. The EMS also consists of the staff’s responsibilities, including records of training qualifications. On site we have a notice board with the sites other licences and exemptions, so they are available at all times.

**Keeping records-**

The EMS includes a document to ensure that all changes to documents are made in a consistently recorded manner and records are retained appropriately. Documents and records are maintained in order to demonstrate the effective operation of the Integrated Management System and that work has been carried out correctly.

All stored documents and records will be identifiable, accessible, and retrievable so that it is possible to trace records to relevant activities. A list of records held is maintained, explaining title of record, retention responsibility and retention period.

The standards, codes of practice and any other documentation not generated by the Company will be controlled and stored electronically and areas used to store hard copies of documents will remain free from excessive heat, cold, water, damp and or anything else likely to cause undue deterioration.

**Review-**

The management system describes the methods that are used to review the environmental aspects and impacts, and implement the necessary controls associated with the operations and activities of JH Metals Ltd and to assess their significance. Those identified as significant will act as a basis for further controls and improvements.

The environmental objectives set from the significant aspects will be monitored during management reviews to assess the progress. The environmental and Health and safety risk assessments will be reviewed on a regular basis (annually as a minimum), in addition to other assessments that may be carried out due to the circumstances such as: amendments to legislation, codes of practice or standards make it necessary, if operations and activities change or when new projects are planned which may alter the company’s work, when the occurrence of accidents, incidents or other factors imply that existing assessments may be insufficient and need to be amended.

B2-3: Please see - Site Plan with drainage & Site plan - activity

B2-4: Please see - Site condition report (SCR)

B2-5: Please see – Non-Technical Summary – JH Metals Ltd

Other documents:

Fire prevention Plan – JH Metals Ltd

Aspects & Impacts Register (v0.01)