

INGREBOURNE VALLEY LIMITED

ENVIRONMENTAL MANAGEMENT SYSTEM SUMMARY

Ingrebourne Valley Limited are committed to the use of an Environmental Management System in order that they can minimise their impact on the environment and, where possible, leave a site in a better condition than when it was purchased or otherwise taken over.

To this end, they have put in place an Environmental Management System in accordance with the ISO 14001 international standard. Although the basis of the System has an Environmental Management Manual to cover all Sites, each location has its own site-specific Manual to allow for the variation between sites.

Pages 2 and 3 of this summary have been extracted from the Company Manual (Sections 1.2 and 1.3) with the purpose of demonstrating that all requirements of ISO 14001 have been addressed.

If necessary, a full copy of the Manual can be provided on request.

Environmental Policy

The Company has an Environmental Policy, which is reproduced in the Environmental Management System Manual.

Planning

When the Company takes over a new site where it wishes to implement the Environmental Management System, it first assesses the Environmental Aspects and Legal Requirements, in particular the conditions laid down in the Planning and Landfill Permit documentation. An initial Environmental Audit is carried out by an Independent Consultant, assisting with the identification of Significant Environmental Aspects. The Company then sets Objectives and Targets to deal with the issues identified.

Implementation and Operation

All other requirements of ISO 14001 (as specified in the Company core Manual) are then considered. This will include items such as: training of staff that will be running the site; communication between local residents, the Regulatory Authorities, site staff and Company Management; site documentation and record-keeping; the practicalities of meeting Objectives and Targets set for the site; how the site will be run in order to keep within Statutory Legislation and Conditions set by the Regulatory Authorities; and how site staff will deal with all kinds of emergency – Health, Safety and Environmental.

Checking and Corrective Action

The Company ensures that all legally required monitoring, as specified in the Permit, is scheduled to be carried out by a competent person. Subsequent Environmental Management System Audits will identify any Non-conformances and suggest Corrective and Preventive Actions that can be taken to minimise future Non-conformances. These Audits are carried out at least annually, by an Independent Consultant and accompanied by Company Management. The results of these Audits are used as a basis for the Management Review.

Management Review

An Environmental Management System Review Meeting is held at least annually. This will usually include the presence of the General Manager, Technical Supervisor, Hydrogeological Consultant and Environmental Management Consultant. The aim is to: review progress with Objectives and Targets; ensure that Corrective and Preventive Action Requests have been satisfactorily completed; assess effectiveness of the Environmental Management System; ensure that the necessary staff and resources are made available to effectively deal with the issues identified; review trends and identify potential cost-savings; consider complaints, incidents and concerns from other interested parties; and review imminent legal and other changes that may impact on Company operations.

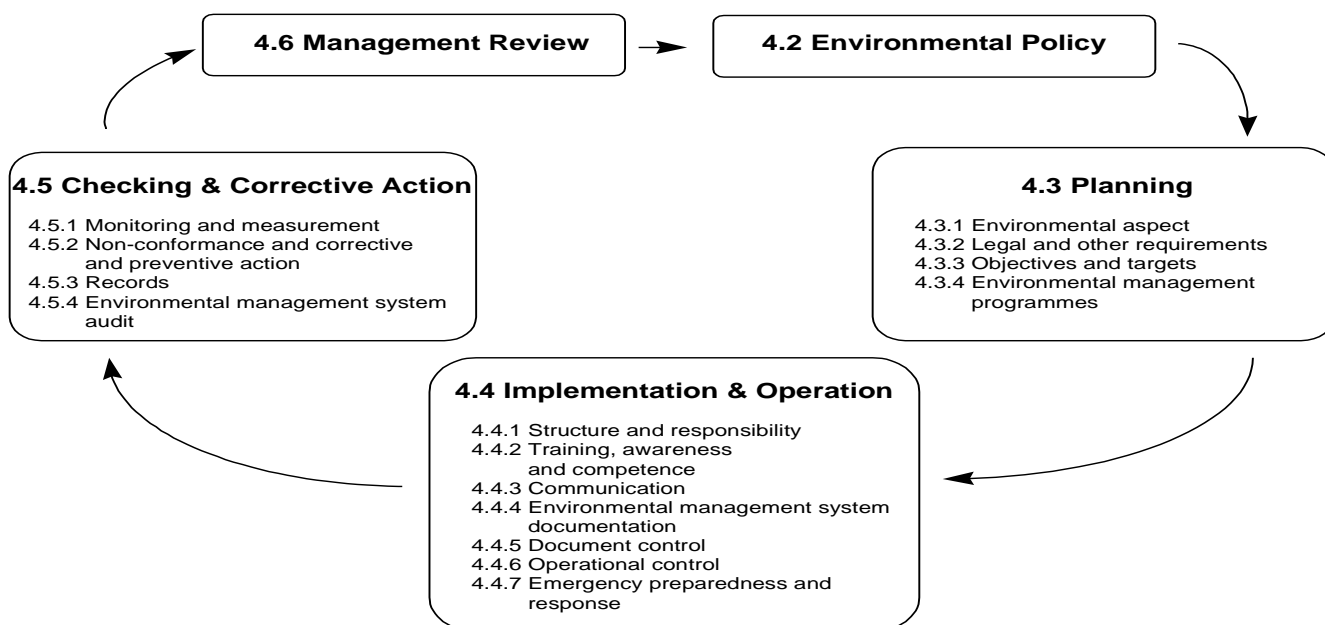
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1.2 SYSTEM DESCRIPTION, MANUAL STRUCTURE & MANAGEMENT STRUCTURE

System Description

The systems and procedures documented in this manual follow the requirements of the ISO 14001:1996 standard as shown below:



Manual Structure

The Manual is written in accordance with ISO 14001:1996 and establishes the Company commitment to environmental management systems. The Site Environmental Manual is set out in five Sections. Procedures within these Sections may be amended as appropriate to ensure that the Manual continues to relate to the changing needs of the Company and the market it serves.

Section 1 Environmental Management System: Outlines the Environmental Management System (EMS) for the Company as a whole.

Section 2 Company Environmental Management: Defines Company 'objectives and targets', the 'environmental management programmes' to achieve them and the procedure for 'management review'. Included here are descriptions of the 'roles and responsibilities' of all Company employees and 'suppliers and contractors'.

Section 3 Environmental Procedures: Details the Environmental Management System 'procedures' required by the Company.

Section 4 Site Environmental Management: Defines site-specific environmental management issues that relate to the activities, products and services for environmental control within the EMS.

Section 5 Operational Control Procedures: Defines site-specific operational control procedures to ensure conformance with the EMS and site activities.

Management Structure

The Company family tree is reproduced in the Health and Safety Document.

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1.3 MANAGEMENT SYSTEM DOCUMENTATION

The following describes the core elements of the EMS, their interaction with the Standard and provides direction to related documentation.

ISO 14001 Clause	Core Elements of Company System and Interaction
4.2 Environmental Policy	1.1 Company Environmental Policy Statement
4.3.1 Environmental Aspects	3.1 Environmental Aspects (procedure & blank forms) 4.2 Completed Aspects 1 Form 4.3 Completed Aspects 2 Form
4.3.2 Legal & other requirements	3.2 Legal & Other Requirements (procedure & blank forms) 4.4 Completed Legal 1 Form 4.5 Completed Legal 2 Form
4.3.3 Objectives & targets	2.1 Completed Objectives & Targets Form 3.3 Environmental Objectives & Targets (procedure & blank form)
4.3.4 Environmental management programme	2.2 Completed Management Programmes Form 3.4 Environmental Management Programmes (procedure & blank form)
4.4.1 Structure & responsibility	1.2 System Description, Manual Structure & Management Structure 2.4 Roles & Responsibilities
4.4.2 Training, awareness & competence	3.5 Training, Awareness & Competence (procedure & blank form)
4.4.3 Communication	3.6 Communication - External & Internal (procedure & blank form) 4.1 Site Description
4.4.4 Environmental management system documentation	1.2 System Description, Manual Structure & Management Structure 1.3 Management System Documentation 1.4 Related Company Management Documentation 1.5 Scope of Company System, Manual Administration and Revisions
4.4.5 Document control	3.7 Document Control (procedure)
4.4.6 Operational control	3.8 Operational Control - Suppliers & Contractors (procedure) 5 Operational Control Procedures
4.4.7 Emergency preparedness & response	3.9 Emergency Preparedness & Response (procedure & blank form)
4.5.1 Monitoring and measurement	3.10 Monitoring & Measurement (procedure)
4.5.2 Non-conformance & corrective & preventive action	3.11 Non-conformance & Corrective & Preventive Action (procedure & blank form)
4.5.3 Records	3.12 Records (procedure)
4.5.4 Environmental management system audit	3.13 Environmental Management System Audit (procedure & blank form)
4.6 Management review	2.3 Management Review