

BRADGATE BAKERY

ENVIRONMENTAL MANAGEMENT SYSTEM POLICY MANUAL



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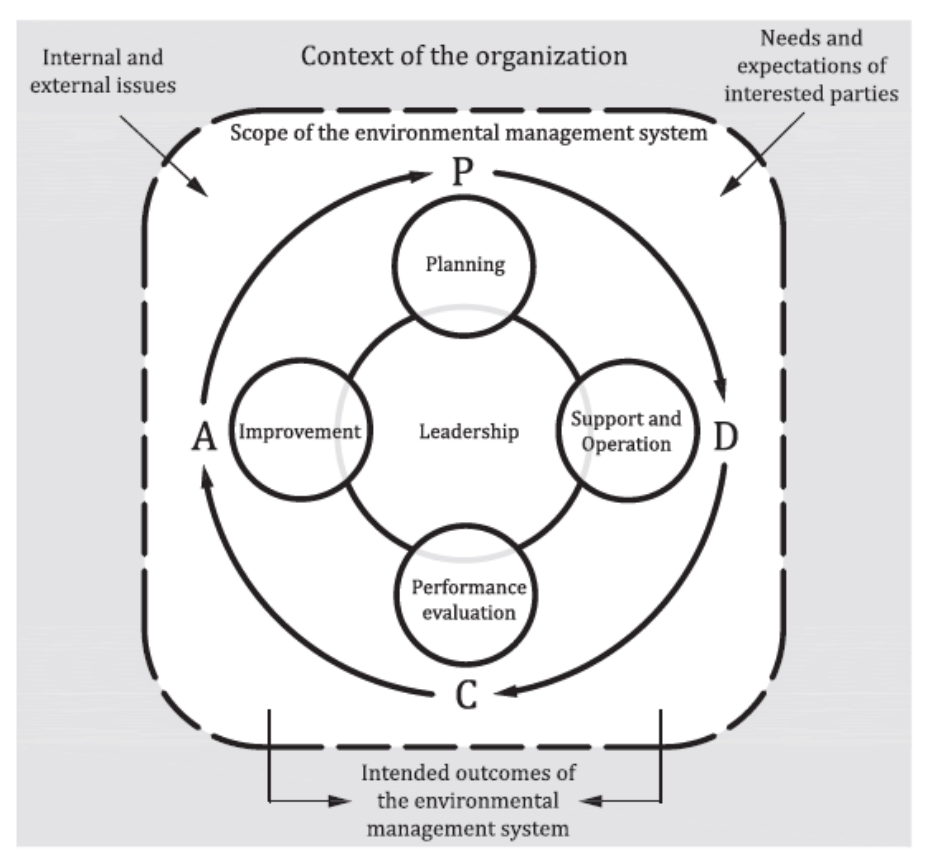
Introduction

Bradgate Bakery is a subsidiary of Samworth Brothers Ltd and encompasses two facilities (Ashton Green & Madeline Road) based in Beaumont Leys, Leicester. Bradgate Bakery produces high quality sandwiches, wraps, pasta pots & salads for the major UK retailers. The business has a main office/administrative block at both sites along with production halls split into high care and low risk.

Bradgate Bakery recognises the business obligation to consider social value and reduce its environmental impact, avoid impacting our neighbours and minimise the usage of non-renewable resources where possible.

Bradgate Bakery holds an environmental permit and therefore has several conditions to comply with. Conditions include having an effective environmental management system to identify and control environmental risk. The Environment Agency’s Core Permitting Guidance recommends ISO 14001 as a management system to implement.

This Environmental Policy Manual outlines the basis of Bradgate Bakery’s Environmental Management System (EMS). The Policy Manual has been established to provide an index and description of the core elements of the EMS and Bradgate’s intentions in managing and controlling their interactions with the environment.



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Clause 4: Context of the Organisation

Samworth Brothers Purpose – We do Good Things with Great Food

As a business we seek to be a long-term force for good. Our vision is to be the best food company in the UK. We make profit so that we can reinvest in the future of the business and make a positive difference for our people, our communities, and all our stakeholders.

To minimise our impact on the environment, we’re taking action on the things that are important to protect our planet for generations to come.

Values

We are a Family - We appreciate, encourage, and treat one another like family, no matter who we are or where we’re from. Everyone is welcomed and supported, and because we trust each other we can be open and honest.

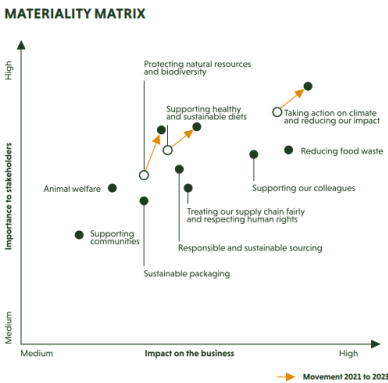
We build relationships with those who share our values so we can work together in the same way, towards the same goals.

We Take Pride - We take pride in our work and quality is our way of life. People trust us to make their food and we want to do our best for them. Our business is a force for good, and we all want to play our part in doing things right.

We Make Things Happen - We believe there are no limits to what we can achieve together. We’re curious and open to learning new things. When we recognise an opportunity to improve ourselves, our colleagues, or our business, we grab it with both hands. We make profit to reinvest in a better future.

Samworth Brothers Responsibilities

One of our core values is to deliver and champion environmental best practices, so we take our environmental responsibilities very seriously. Our Group ‘Responsible Business’ approach focuses on delivering continual improvements through reducing impact, reusing resources, recycling materials, and adopting recovery principles. We think of our Responsible Business approach as a pie, with Samworth Brothers’ purpose at the heart and three connected ingredients – people, planet and product, frame how we will achieve our goals. We have defined targets for each, and the governance and roadmaps required to meet our objectives.



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For more information on Samworth Brothers please visit:

- Homepage: www.samworthbrothers.co.uk
- Group Responsible Business: <https://www.samworthbrothers.co.uk/responsible-business/>
- Bradgate: [Bradgate Bakery | Samworth Brothers](#)
- Staff Handbook: <https://view.pagetiger.com/samworthbrothershandbook>

Intended outcome of the EMS

“Intended outcome” means what the organisation intends to achieve by implementing its EMS. These will include the enhancement of environmental performance, fulfilment of compliance obligations and achievement of environmental objectives. They also include those items that go beyond the EMS requirements such as adopting social and environmental principles to support a broader sustainability initiative.

Bradgate Bakery’s Environmental Management System has been developed in accordance with the requirements of ISO 14001:2015 and aims to achieve the following:

- Protect the environment by preventing or mitigating adverse environmental impacts.
- Ensure current activities meet or exceed current legislation and codes of practice, ensuring that any activities that could harm the environment are under control.
- Continually improve environmental performance.
- Minimise waste.
- Improve water and energy efficiency.
- Identify environmental aspects and impacts.
- Monitor and reduce harmful emissions.
- Raise and promote environmental awareness.
- Protect the local environment.
- Communicate environmental information to relevant interested parties.
- Engagement with supply chain to encourage good environmental practices.

To achieve the intended outcomes, Bradgate Bakery has established, implemented, and will continually improve, an environmental management system. This includes the processes needed and their interactions, in accordance with the requirements of ISO14001.

The context of the organisation includes the natural environment in which it operates. The natural environment can create conditions and events, which affect the organisation’s activities, products, and services. Conditions can be existing or subject to gradual change, whereas an event can involve a sudden change, which is typically explained by an extreme situation. Preparing for, and managing the consequences of, such conditions and events supports business continuity.

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External issues

External issues that can impact, either positively or negatively, the way Bradgate Bakery manages its environmental responsibilities have been made and include the below.

Issue	Description	Risk	Opportunity
Sensitive receptors near Bradgate Bakery	Bradgate Bakery is located at number 200 Madeline Road, grid reference SK 57335 08848 and 5 Bennion Road, grid reference SK 57335 09056. Residential properties are located nearby approximately 200m north of Madeline Road and 200m east of Ashton Green. 2km from the site there are local nature reserves, Goss Meadow to the southwest and Watermead Country Park to the east. There are four SSSI sites within approximately 5km of the site, Gipsy Lane Pit, Sheet Hedges Wood, Swithland Wood, the Brand, Bradgate Park and Cropston Reservoir. Nearby water courses include Rothley Brook approximately 1.7 km west of the site and Thurcaston Brook to the north.	Proximity to residents can lead to increased risk of complaints for noise or odour if operational controls are not in place. Complaints can lead to a negative impact on reputation and may affect future planning considerations by council. Road traffic and HGV deliveries can cause emissions, odour and noise pollution leading to complaints from neighbours. Emissions to air from on site could be harmful to human and ecological receptors. Emissions to air under current operation have been assessed as 'not significant'.	As Bakery is near a residential area this allows recruitment from people in walking distance to site, reducing potential emissions. Through good communications with residents Bradgate Bakery can be a good neighbour, improving its reputation. Due to proximity to local residents, consideration to electric vehicles could be made to reduce noise. White noise reversing alarms on forklift trucks could further reduce noise pollution.
Supply chain	Bradgate Bakery provides goods to several customers. Historically the business has been guided by customer requirements with meat and produce coming from	If crop failures lead to produce shortages alternative suppliers can be difficult to source as suppliers have to be Tesco approved. These may	Work with customer to develop environmentally friendly packaging and to identify

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Issue	Description	Risk	Opportunity
	Nurture approved suppliers.	therefore not be in line with responsible sourcing.	new opportunities of suppliers. Align our environmental actions with customer's requirements.
Regulatory – Environmental Permit & Discharge Consent	Bradgate Bakery has been operating an independent facility since 1994. In 2016 due to changes in Environmental legislation brought about because of the implementation of the Industrial Emissions Directive into UK & European law requiring facilities where the production of food stuff has a capacity over 75 tonnes/day of animal raw materials, the business applied to become an environmentally permitted site. This was approved in September 2017.	A breach of permit or consent can lead to regulatory enforcement. Changes necessary to the site can be delayed due to the need to vary the environmental permit.	Provides a driver for continuous environmental improvement. Encourages efficiencies due to specific permit conditions.
Political	Brexit has lasting impacts, such as reduced availability of labour due to colleagues returning to their native country, restrictions on new labour and changes to trade agreements. The ongoing war in Ukraine has resulted in worldwide shortages of some raw materials and energy driving prices up.	Potential for increase in waste due to inexperienced staff. Purchasing raw materials from the EU may become more expensive, therefore meaning we are forced to consider purchasing from further afield – increase in food miles. Changes to legislation may enforce new requirements on Bradgate Bakery.	Changes in laws and regulations may provide a structure to inform Bradgate Bakery's environmental strategy (e.g., the Environment Bill). Purchasing from manufacturers / suppliers in the UK, reducing Scope 3 emissions.

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Issue	Description	Risk	Opportunity
	Changes in legislation particularly around plastics and recycling, along with a worldwide excess of waste plastic have resulted in some materials no longer being accepted for recycling.	Financial benefits of recycling less attractive. More materials can now only be disposed via HT incineration. More material sent as Waste to Energy instead of recycling.	More focus on energy efficiency Opportunity to investigate more innovative recycling / recovery methods
Covid 19	Bradgate adopted several measures to address Covid 19. These have now been removed following Government guidance, based on current risk level. Risks & Opportunities are still noted should threat levels increase.	Loss of business & adaptation of ways of working may lead to lack of focus on environment. Driving production efficiencies and change in product mix may affect ability to meet KPIs. Business continuity response can lead to a change in resource use. CAPEX projects may be delayed due to availability of capital. Social distancing measures on site preclude the opportunity to hold engagement days, leading to a lack of engagement with staff.	Potential to lobby government for Regulatory Position Statements and Climate Change Agreement relief. Driving production efficiencies may lead to waste reduction and reduce resource use per tonne of product. Reduced emissions from commuting due to increased number of staff working from home.
Climate Change	A change in global or regional climate patterns. Food is one of society's key sensitivities to climate. We have completed a Climate Change Adjustment Risk Assessment based on the	Availability of key components disrupted due to local/global drought or flooding? Alternative sourcing in more distant countries resulting in increased "food miles" Increased pest numbers and variety results in more frequent sanitisation	Bradgate Bakery can contribute to the Responsible Business plan at Samworth Brothers and set science-based targets, reducing its contribution to climate change.

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Issue	Description	Risk	Opportunity
	following future climate projections: • Summer daily maximum temperature may be around 7°C higher. • Winter daily maximum temperature could be 4°C more than the current average with potential for more extreme temperatures, both warmer and colder. • Daily Extreme Rainfall: The biggest rainfall events are up to 20% more intense than current extremes. • Average winter rainfall may increase by 44% on today's averages. • Sea levels could be as much as 0.6m higher compared to today's levels. • Drier summers: potentially up to 44% less rain than now. • River Flows: At its peak, the flow in watercourses could be 50% more than now, and at its lowest it could be 75% less than now • Storms could see a change in frequency and intensity.	leading to increased water use/ chemical addition Warmer UK temperatures result in increased energy / water use to maintain chiller temperatures? Increases in consumer demand for our products will result in increased output above our current permit limits	A warmer UK may mean that different raw materials can be grown in the UK, reducing Bradgate Bakery's carbon footprint. Increases in consumer demand for our products will result in increased output allowing further investment in modern, more efficient technology

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Issue	Description	Risk	Opportunity
Cultural	Ideas, customs and social behaviours of society	Eating habits – Vegan/ vegetarian/ gluten may need to change product mix, which could increase food waste on site.	Eating habits – Vegan/ vegetarian diets are known to decrease the environmental impacts across the lifecycle of the product.
Technological	Changes in technology available to businesses	Requires increased levels of specialist technical support – not available in house: - Increased use of transport by visiting Engineers. Increased energy and water consumption if not maintained appropriately. Increased food waste from undiagnosed faults.	Ability to control utility and raw material efficiencies under normal operating conditions without relying on human intervention. New technology is usually more energy efficient.
Economic –	Cost of living crisis Recent / ongoing transport disruption	Business may have to divert Environmental improvement capital to cost reduction projects. Reduction in retail customers available spend and / or transport shortage results in last minute order changes leading to waste raw materials.	During periods of economic prosperity, the business may have more capital to spend on environmental improvement projects.
Changes in cost of energy	Prices of all energy and fuel has increased	Costs may dictate a switch to a different, potentially more environmentally harmful fuel. For example, the cost of 100% renewable electricity has tripled.	Opportunity to extend current / investigate new on-site renewable generation or low carbon technologies.
Driver availability	The shortage of drivers for delivery vehicles in the UK has eased, however risks and opportunities still noted.	Less drivers may mean less efficient routes are taken, leading to an increase in transportation emissions.	Opportunity to investigate load combining / optimisation?

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Issue	Description	Risk	Opportunity
Inflation	There is a significant increase in the cost of raw materials, as well as energy.	Significant need for efficiencies may lead to lack of focus on other areas of environment.	Potential to make non viable projects “viable”

Internal issues

Internal issues that can impact, either positively or negatively, the way Bradgate Bakery manages its environmental responsibilities have been made and include the below.

Issue	Description	Risk	Opportunity
Changes in product mix	Products produced by Bradgate Bakery change in line with New Product Development and customer requirements.	Changes in product mix can lead to the requirement of more stringent operational controls. For example, the use of fats in cooking can increase the fats in our trade effluent, which may require for fat traps to be installed on our trade effluent drains. A broader product mix generally leads to an increase in food waste due to an increase in trials, a wider variety of ingredients to be managed and an increase in delists.	An increase in vegan/vegetarian options may lead to a decrease in environmental impacts across the product life cycle.
Strategic direction	The strategic direction of the business can impact a variety of areas.	The growth of the Bradgate Bakery can impact biodiversity through building works and loss of habitat. Changes in process and increases in volume can affect the emissions released from operations.	Engaging with decision makers during the decision-making process provides the opportunity to influence decisions and appropriately manage environmental risks.

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Issue	Description	Risk	Opportunity
Culture and capabilities i.e., people, knowledge, processes, systems	Ideas, customs and social behaviours of society	New, untrained staff may not share the vision of the business, and therefore may mean employees are less environmentally conscious.	Engage with staff through the induction process to ensure they are trained on business culture, including the Positive Impact Plan – Responsible Business.
Change in management	A change in top management, leading to a change in Bradgate's priorities	A change in management can disrupt plans.	New managers can view a problem with a fresh perspective, offering new solutions.
Fluctuation in orders	We operate a "just in time" model of business. This can mean that orders can fluctuate at short notice.	A significant drop in orders can mean a significant increase in food waste.	Utilise connections with charitable outlets to divert any potential waste from the bin.
Expansion (AG3)	Expansion of site production capacities, increased building footprint, new storage & treatment capabilities	Potential for environmental incident during build program. Increased road traffic (raw material deliveries & additional staff) Increased production will result in increased energy use, water use and trade effluent discharge Increased production capacity may exceed the permit capacity thresholds Potential to disrupt biodiversity.	New build gives opportunity to utilise modern technologies such as more efficient machinery, renewable energy (additional solar PV panels) and lower GWP refrigerants. New, effluent treatment facility. BNG study identifies improvements that can be made to Bio-Diversity such as prioritising ecological enhancement, new planting, replacing decorative grass with mixed native scrub to create natural habitat. Opportunity to increase staff parking capacity and relieve off-site parking.

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Understanding the needs and expectations of interested parties.

Interested parties are also part of the context in which an organisation operates and should be considered when the organisation is reviewing its context. Determining interested parties and developing a relationship with them enables communication, which can lead to the potential for building mutual understanding, trust and respect. This relationship need not be formal.

Interested parties can be internal or external to an organisation. Interested parties can change over time and can depend on the sector or industry or the geographic location in which the organisation operates. Changes in the internal or external issues that are part of the organisation's context can also result in a change in interested parties.

As part of Bradgate Bakery's Environmental Management System several key stakeholders, both internal and external, have been identified. By considering the requirements/expectations of these stakeholders, Bradgate Bakery has designed an Environmental Management System which will deliver environmental performance to meet and exceed all expectations.

Stakeholder	Requirements/Expectations	Compliance Obligations Y/N
Samworth Brothers Group	Annual targets set in agreement with Group vs previous year. All targets are set per tonne of production: - Reduction in electricity use (kWH/t) - Reduction in gas use (kWH/t) - Reduction in water use (M3/t) - Reduction in food waste intensity (% vs output) These targets are tracked through the monthly board report.	Yes
Customer (Tesco)	PIU (Tesco audit) requires the site to have: - ISO 14001 OR: - A site-specific environmental policy. - A system for managing its environmental impact. - Ensure environmental risks are identified and managed - Independent environmental audits to be carried out. - Risk assessment on water quality. - Schematic plan of all water circuits within the site which are reviewed annually. - Waste and effluent management must comply with local legal requirements. - Where recyclable materials are collected the site must have a system in place to ensure effective segregation.	Yes
Customer (Tesco & Co-op)	MSC (Marine Stewardship Council) Accreditation to ensure all our seafood is sustainable and sourced from accredited suppliers (not declared on packaging)	No

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Stakeholder	Requirements/Expectations	Compliance Obligations Y/N
Samworth Brothers Group	RSPO (Roundtable on Sustainable Palm Oil) certification Assurance that an organisation has committed to and complied with sustainability requirements relating to the production or handling of palm oil in their products.	No
Bradgate Colleagues	Bradgate are expected to be a moral employer. Staff expect to be engaged with.	No
Site Senior Leadership Team	Expect legal compliance and for Bradgate to achieve its targets.	Yes
Environment Agency	Full compliance with the conditions of our environmental permit.	Yes
Government Agencies	Full legal compliance.	Yes
Leicestershire County Council	Good quality information for planning applications delivered in a timely manner.	No
Seven Trent	Full compliance with our discharge consent.	Yes
Residential Housing	Local residents will be concerned with: - Noise. - Odour. - Litter. - Air emissions. - Road congestion.	No

Which become compliance obligations?

In addition to the significant aspects and legal requirements identified, the following interested parties' requirements will be recognised as compliance obligations, with regular reporting to relevant parties regarding compliance and progress.

- Samworth Brother targets, set by the group incorporating customer requirements.
- Environmental permit conditions & requirements.
- Severn Trent Effluent discharge consent.

Organisational unit, function, physical boundaries

Bradgate Bakery operates from two sites based in Beaumont Leys, Leicester. Each site's organisational unit/functions comprise office administration (e.g. Personnel, IT, QA, Safety, Health & Environment (SHE), General Management), Low Risk (including Intake and Despatch), High Care (including Prep and Production), changing facilities, and amenities. In addition, Ashton Green also houses a Distribution operation.

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Activities, products, and services of the organisation

The process being carried out on site involves the production of sandwiches, wraps, pasta pots and salads. Ingredients include bread, fresh produce, ready prepared cooked meats, dry pasta, rice, grains and ready to use sauces, all of which are delivered to site via road transport. Salad items are prepared in house by first entering through Intake, before passing through to the salad Prep area, where produce is washed with chilled mains water and sliced/diced. Pasta is cooked in a cooker and then transported to the cook, quench, chill quench tank before draining. Other ingredients will be de-boxed in Intake, transferred through sanitiser tunnel/de-bagged or removed from their cans prior to entering through to High Care. The individually prepared ingredients are then portioned into trays ready to be deposited mechanically or by hand on to the required product. Finished products are then packed into skillet sleeves, flow wrap or plastic trays before being passed through to Despatch, where cardboard outer cases are added prior to despatch of the product to the customer. Product distribution is predominantly carried out by Samworth Brothers Supply Chain (SBSC), along with contract haulers to major supermarkets and convenience stores throughout the country.

Authority and ability to exercise control and influence

Bradgate Bakery has full authority and ability to control site activities. However, there is only limited influence over supplier and customer requirements, as well as logistics operations.

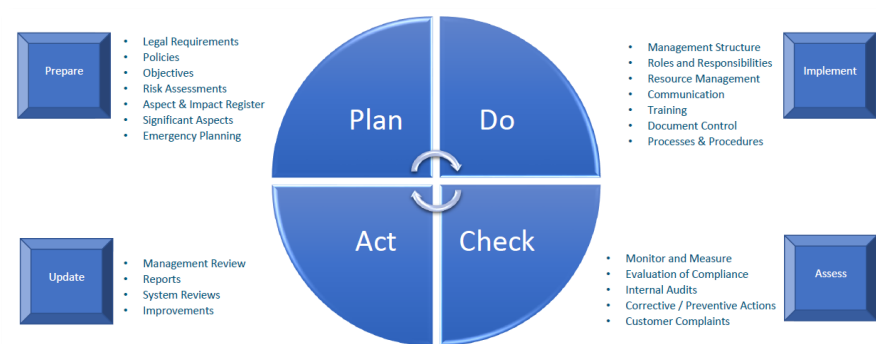
Determining the scope of the environmental management system

The scope of Bradgate Bakery EMS covers the aspects and impacts associated with production of finished chilled food products and on-site projects undertaken outside of normal production processes. These are undertaken within both Ashton Green and Madeline Road site boundaries.

The scope of the EMS **does not include those activities that are managed elsewhere within Samworth Brothers** such as distribution, company cars and purchasing of raw materials. Reference has been made to these elements within this policy manual and Group level information is provided where appropriate and available.

ISO 14001 Certificate Functional Scope: The manufacture of chilled food products.

The EMS is built on the “Plan, Do, Check, Act” model, which is adopted in the ISO: 14001 framework.



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Clause 5: Leadership

Leadership and commitment

Monthly performance data on progress towards targets are reported at the Samworth Brothers board meeting, with senior management taking accountability for targets and therefore the effectiveness of the environmental management system at their sites.

This accountability ensures:

- The environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organisation.
- The integration of the EMS requirements into the organisation's business processes.
- Resources needed for the EMS are available.
- The importance of the EMS is communicated across site.
- The EMS achieves its intended outcomes.
- Persons are directed and supported to contribute to the effectiveness of the EMS.
- Continual improvement of the EMS and of site processes.
- Support of other relevant management roles to demonstrate their leadership in their areas of responsibility.

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Monthly Safety, Health and Environment (SHE) briefings are delivered through weekly KPI meetings at Manager levels to review:

- Progress towards objectives and targets.
- Key findings of audits.
- Any changes in the business which may affect the effectiveness of the EMS.

Environmental policy

We have demonstrated our commitment to continually improve the environmental performance of our operations in the company Environmental Policy. This has been endorsed by way of signature by our Site Director and is shared with all colleagues through notice boards.

The environmental policy provides the framework for setting and reviewing environmental objectives and targets. Our policy is communicated to all persons working for and on behalf of the company and those identified as key stakeholders in relation to the environmental success of the company. The policy is available to the public and communicated internally and externally by the following means:

- Staff and entrance notice boards
- Request by email or telephone

The Environmental Policy is reviewed annually, and any significant revisions are presented to the Site Director for final approval. The Environmental Policy is kept electronically within the EMS Folder on the public shared drive.

Organisational roles, responsibilities, and authorities

Accountability for managing the EMS is with the SHE Manager / Environmental Advisor. There are several key staff members who have specific responsibility for the implementation and overseeing of the EMS. Below are the key roles, along with their responsibilities and authorities:

- **The Bradgate Bakery Site Director**

The Site Director is accountable for environmental management, which includes endorsing environmental policy, providing adequate resources, and maintaining the system on a strategic level.

- **SHE Team**

The SHE Team are responsible for the implementation of the EMS, including ensuring resources supplied by the Site Director are sufficient to ensure the effective operation of the EMS. They are responsible for administering the system on a day-to-day basis, including the following:

- Ensuring the environmental policy is implemented through the EMS.
- Ensuring the EMS is established, implemented, and maintained in accordance with the ISO 14001 standard requirements.

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- Reporting on EMS performance to the leadership team for review and to provide a platform for improvement of the system.
- Raising staff awareness.
- Auditing compliance against the EMS, including objectives and targets achievement.
- **Managers**
Responsible for assisting the implementation of the EMS, providing managerial support for staff to get involved and ensuring appropriate functional resource is directed to ensure operational requirements of the system are met. Responsible for conducting manager's audits monthly.
- **Colleagues**
Everyone at site is responsible for reducing their environmental impact wherever possible, ensuring activities are undertaken in an environmentally considerate manner and in line with company policy and objectives.
- **Group Environmental Manager & Head of Responsible Business**
Responsible for advising sites on group strategy and coordination of best practice.
- **External Agencies**
External agencies such as Environment Agency, set criteria for the control, monitoring and measurement of significant impacts on the environment through legislation e.g., Bradgate Bakery's environmental permit. The standards/legislation impact the EMS through reporting and monitoring requirements.

Clause 5 Procedural & Document References

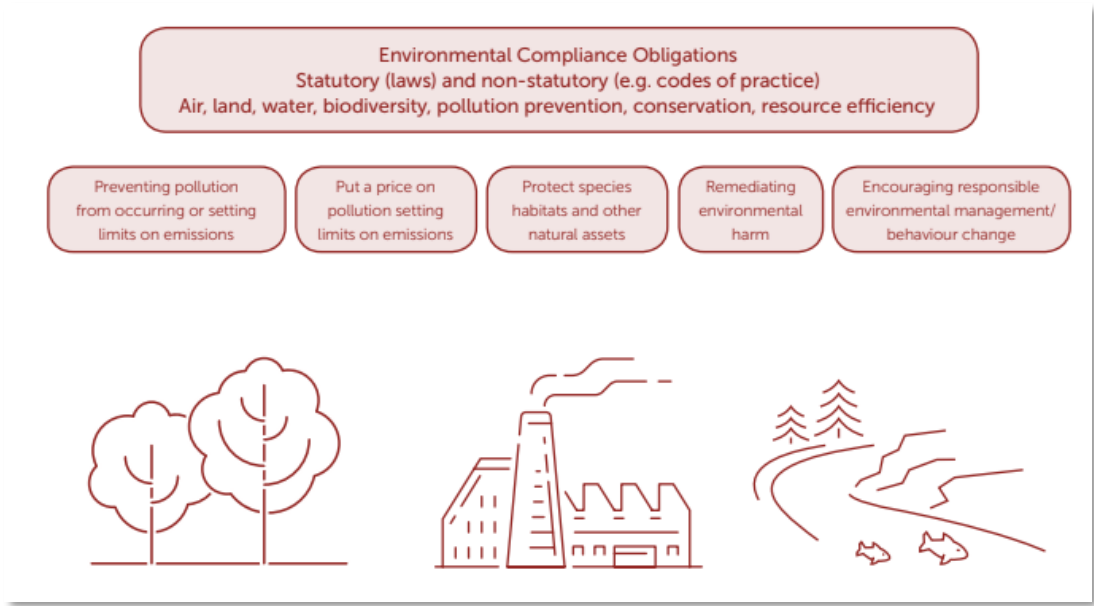
[EMS 001 - Environmental Policy](#)

Clause 6: Planning

When planning for the Environmental Management System, the organisation considered:

- Bradgate Bakery's core values.
- The needs and expectations of interested parties.
- The scope of its environmental management system.
- Risk and opportunities related to the identified environmental aspects and compliance obligations.
- Evaluation of actions

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Environmental aspects

Bradgate Bakery has established a procedure for the identification of the **environmental aspects** of its operations that it has control over and those which it can be expected to have reasonable influence over. The **environmental impacts** of such aspects are evaluated to identify those of greatest significance by means of an objective scoring methodology. The evaluation helps to highlight those deemed most significant.

Where **significant impacts** are identified, associated aspects are considered in setting the company’s environmental objectives and in the maintenance of the EMS. The identified significant aspects are reviewed annually and updated accordingly.

Compliance obligations

Relevant legislative information is maintained in the form of a legal and other requirement register. Bradgate Bakery has a contract with Barbour EHS to assist with the maintenance and update of the legal register. This establishes a process for the identification of, and evaluating compliance with, environmental legislation and other related environmental requirements applicable to the business. The register is reviewed three times per year and updated as necessary, along with an evaluation of relevance to the business. Compliance with identified legislation will be monitored on an annual basis through internal and external audits.

When assessing the significance of environmental aspects, reference to the legal and other requirements register will be recorded. The SHE Team will ensure that the legal register remains relevant by obtaining and reviewing, on a regular basis, the following environmental legislation update aids:

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- IEMA Webpages and publications
- Gov.UK websites.
- Legal updates. – Barbour EHS
- Food & Drink Federation webinars and conferences.

Environmental objectives and planning to achieve them

Environmental objectives and targets have been documented by Bradgate Bakery that are consistent with the environmental policy, including prevention or minimisation of pollution, compliance with legislation and continual performance improvement.

In establishing objectives and targets consideration is made of the following:

- Legislative compliance.
- The register of environmental aspects.
- Ability to implement these targets.
- Options relating to technological improvement.
- The views of interested parties, including customer targets.
- The organisational objectives as well as financial, operational, and business requirements.

Progress against objectives and targets is reviewed in the Responsible Business section of the monthly Group Executive Board meetings and an overview presented at weekly site KPI update meetings. Any non-compliances relating to the management programmes will be monitored by internal audits and the findings presented for consideration at management review. A review of objectives and targets shall be set annually following the management review. Generally, all targets set shall be:

Specific
Measurable
Achievable
Realistic and/or Relevant
Timely and/or Time-bound

Environmental objectives shall be:

- Consistent with the environmental policy.
- Monitored.
- Communicated to relevant stakeholders.

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Site objectives and targets

Parameter	Target	Tracking & Reporting
Energy	Intensity Reduction (kWH/t) vs previous year in line with site energy plan & any expansion in business.	Monitoring through carbon desktop. Reported through Board Report.
Water	Intensity Reduction (m3/t) vs previous year in line with site water plan	Monitoring through carbon desktop. Reported through Board Report.
Food Waste	Annual reduction vs previous year with goal to be at 1.6% intensity (t/t) by 2030	Monitoring through PH Hull website & Carbon Desktop. Reported through Board Report.

The Environmental Improvement Plan is kept within the EMS and is available on the public shared drive.

Clause 6 Procedural & Document References

[EMS 002 - Environmental Aspects and Impacts Identification Procedure](#)

[EMS 003 - Environmental Aspects and Impacts Register](#)

[EMS 004 - Legal and Other Requirements Register](#)

[EMS 005 - Environmental Improvement Plan](#)

Clause 7: Support

Competence

Bradgate Bakery ensures that all personnel whose work may interact with the environment will have received appropriate training. This includes contractors, subcontractors and persons performing tasks on its behalf. The SHE Manager is responsible for identifying environmental training requirements and maintaining an environmental training requirements matrix. Training records and/or evidence of competence are held by individual departments and within Personnel records.

Records, in the form of training matrices, are to be updated and reviewed, with all requests for training reviewed to ensure that staff are competent to complete tasks that have a direct or indirect impact on the environment.

Training may be carried out in one of the following ways:

- Informal discussions during or following audit or site inspection.
- Formal company induction process.
- On the job training.
- Structured group training sessions/workshops.
- Formalised one to one training.
- Online training.

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Communication

Internal Communication

Bradgate Bakery has established a mechanism for effective communication between the various levels of the business. Formal mechanisms are in place, which include internal and external communications.

Methods of communication include:

- Monthly and quarterly briefings.
- Weekly Team Brief publication.
- Notice board posts.
- Emails.
- Environmental Moments (electronic and posted)

External Communication

Communications with and requests for information from, external stakeholders with regards to environmental performance should be directed to the SHE Manager or Environmental Adviser for recording and response. A record of requests for information should be recorded in the External Communications Log (EMS 018) and copies saved in the Training, Awareness, Resources & Communications folder (#5) in the EMS.

Control of documented information

Bradgate Bakery has established a process for controlling documents required for the implementation and maintenance of the EMS. The SHE Manager is responsible for retaining a full set of documents and their maintenance, ensuring they remain relevant and effective, and are regularly reviewed by relevant persons.

All procedural documentation vital to the operation of the EMS will be controlled and will be given a unique reference number with a prefix of EMS or relevant departments document control prefix. All controlled documentation is managed under this existing document control procedure. The EMS manual documents are stored electronically on the Public shared drive, the exact file path can be obtained from the SHE team.

Record Control

Specific records will be kept, demonstrating the effective implementation of the EMS and to demonstrate legal compliance. Where appropriate, these are to be retained in archives within the relevant electronic folder. Hardcopies of waste transfer notes (Duty of Care & HWCN) are retained by the SHE Team in line with the Environmental Protection (Duty of Care) Regulations 1991, The Hazardous Waste (England and Wales) Regulations 2016 and the Animal By-Product Regulations EC1069/2009:

- DUTY OF CARE - WASTE TRANSFER NOTES (non-haz) – 2 YRS (non haz waste removed by PH Hull is covered by annual WTN's available on their portal)
- HAZARDOUS WASTE CONSIGNMENT NOTES – 3YRS
- ABP MOVEMENT NOTES – 2 YRS

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Control of Records

A document register is maintained and updated following the review of each relevant document. As part of this document, obsolete documents are detailed along with a description of what has made them obsolete. This document register also holds links to documents held by other departments which are relevant to the EMS.

Clause 7 Procedural & Document References

[Communications Folder](#)

[Training Requirements Matrix](#)

[Document Control Register](#)

[Communication Log](#)

[EMS Internal Guidance](#)

Clause 8:

Operational planning and control

Operational control will be applied to all activities performed on site to ensure pollution prevention, compliance with our compliance obligations and to achieve our targets. The SHE Manager will ensure that relevant operational procedures and site-specific work instructions are in place for each department. New or altered procedures will be issued in line with the document control procedure.

Should any of the operations undertaken cause a nuisance to local residents or neighbours and lead to a complaint, all complaints should be recorded in the complaints log. All complaints should be dealt with within a timely manner and reviewed by the SHE Team and at management review.

Emergency Response & Reporting Incidents

Bradgate Bakery has implemented and maintains procedures for identifying and responding to environmental incidents and emergencies, and minimising the environmental impacts associated with them. Emergency controls are tested on a regular basis and are reviewed after incidents.

In the event of an emergency the Site Crisis Manual should be brought into operation. To do this, the Site Director should be contacted. If the answer to any of the following questions is yes, you are likely to be dealing with a crisis or potential crisis:

- Could the event or situation harm or injure significant numbers of consumers or Bradgate Bakery employees?
- Could the event or situation damage Bradgate Bakery or Samworth Brothers Group or our reputation?
- Is it likely that the event or situation will result in a fugitive emission from site having potential to harm the environment, cause pollution or require notification to the EA?
- Are people outside Bradgate Bakery already aware of the serious event or situation, or are they likely to hear about it very soon?

Also ask how serious is the crisis? How far does it reach? Will it have significant impact?

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The incident should be reported immediately to the site's Senior Production Manager and the SHE team. Once the incident is under control, an environmental incident should be raised in SHE Assure. A further investigation will be undertaken to determine the root cause of the incident. A report should be raised for any incident which has caused harm or has the potential to cause harm to the environment.

A report should also be raised in SHE Assure for all breaches of legal compliance, except for pH breaches of effluent consent at Ashton Green.

Where a significant incident occurs on site a Schedule 5 Notification (see [permit](#)) should be completed by the SHE Manager and submitted to the Environment Agency within 24 hours.

If any of the following should occur in the incident this will need to be reported to the Environment Agency by telephone on 0800 80 70 60:

- Damage or danger to the natural environment, i.e. air, land or water;
- Pollution to air, land or water;
- Risk to wildlife;
- Fish in distress.

In the case of a chemical or oil spill, all used absorbent materials used should be disposed of by an authorised hazardous waste contractor, who should provide a hazardous waste consignment note, in accordance with the Hazardous Waste (England & Wales) Regulations 2016.

Clause 8 Procedural & Document References

[EMS 015 – Noise Management Plan](#)

[EMS 011 – Odour Management Plan](#)

[All Site & Drainage Plans Ashton Green](#)

[All Site & Drainage Plans Madeline Road](#)

[Complaints log](#)

[Audits / Inspections \(Evotix\)](#)

[GEN 25 – Cleaning Instruction Drain Unblocking](#)

[GEN 38 - Cleaning Instruction Line Hygiene & Waste Removal](#)

[GEN 22 – Cleaning Instruction waste Handling](#)

[GEN 11 – Room Cleaning](#)

[GEN 35 – Spillage procedure](#)

Clause 9: Performance Evaluation

Monitoring, measurement, analysis and evaluation

Data on energy and water are recorded in Carbon Desktop. Waste data is recorded on the PH Hull website. This information is then reported to the Group Executive Board (GEB) monthly. Data from emission reports are produced on an annual basis. All data related to environmental performance is collected by the SHE Team who hold the records centrally.

Bradgate Bakery is a participant in a multi sector Climate Change Agreement (CCA) with Defra. As such all electricity, gas and oil usage are monitored and recorded monthly, direct from meter readings.

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Returns are then submitted annually to the scheme administrators - fdcca@slrconsulting, by the CCA Responsible contact.

Water usage, waste disposal and recycling volumes are also monitored regularly and an annual submission to the Environment Agency is made in compliance with our Environmental Permit conditions. This submission will be made by the Environmental Adviser.

Individual Trade Effluent Discharge Consents are in place for both Madeline Road and Ashton Green sites, which include several parameters with associated compliance limits. Severn Trent collect [around](#) 40 samples per year at each site, and pH data is monitored within the iHost online system. The individual consent reference numbers are:

Madeline Road – 008864V - [MR Discharge Consent V3.pdf](#)

Ashton Green - 008403V - [AG Discharge Consent V3.pdf](#)

The results of additional monitoring and measuring data will be periodically reviewed to determine the effectiveness of improvement and pollution prevention measures. Where necessary action will be taken to rectify any problems highlighted because of the monitoring activities.

Equipment

Where calibration of equipment is required to satisfy a regulatory requirement, this will be carried out to a specified frequency determined by risk assessment and site-specific requirements. Calibration or adjustment may also be carried out more often if deemed necessary. Calibration is either performed internally by qualified and trained staff or by appropriately skilled external contractors. The environmental permit currently has no requirements for monitoring equipment to be officially certified (e.g. MCERTS).

Evaluation of compliance

Bradgate Bakery has implemented measures to periodically evaluate compliance against legal requirements as defined in our legal register. Compliance is evaluated via compliance audits and monitored during annual internal and external audits. Internal compliance audits are carried out and logged using our SHE data system - EVOTIX. Compliance is evaluated by the Senior Leadership Team as part of the management review.

Internal audit

Bradgate Bakery operates 3 levels of internal audits for environmental performance & compliance :

- 1) Environmental Compliance audits
- 2) Technical Compliance/system audits
- 3) Management Inspections

Management inspections are conducted by the management team, and occasionally by appointed staff members. These are conducted using SHE Assure on the team iPads and follow a set criteria. The inspection allows the auditor to identify risk and opportunities. With regards to environment and cover energy use, water use, waste, and spills.

Environmental Compliance audits are carried out by competent members of the SHE Team or persons ISO 14001 internal auditor trained. These audits are used to ensure legal compliance. Where

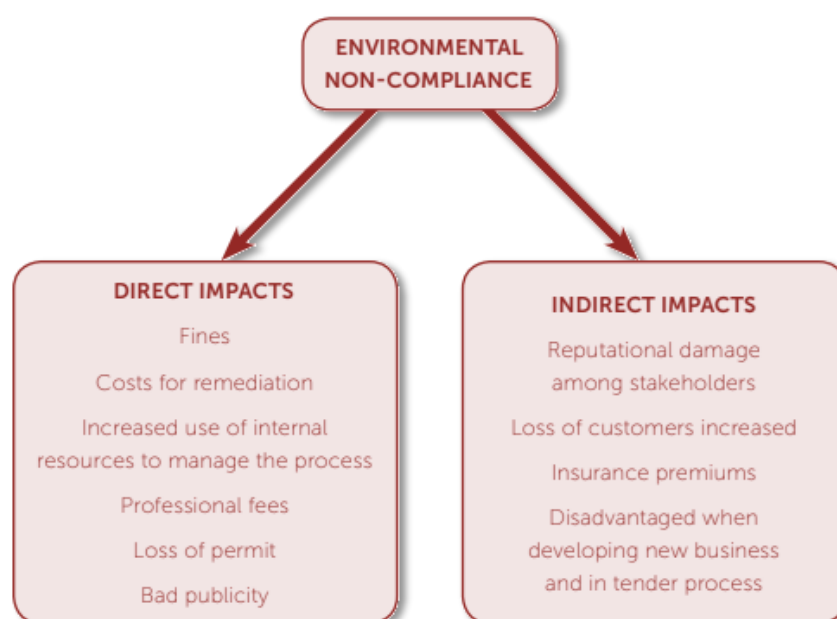
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compliance audits are carried out, any areas for improvement or non-compliance are recorded in SHE Assure, and actions raised to close these out. These are planned to take place through the year in the SHE Calendar. They are arranged with personnel relevant to the audit when the SHE Calendar is reviewed at the beginning of the year.

System/Compliance audits are carried out by internally trained auditors and are part of the quality management system. The focus of the audit is to determine whether the EMS conforms to its own planned arrangements, the requirements of ISO14001:2015, and that the site has properly implemented and maintained the EMS and its legal and other compliance. Site inspections will be undertaken alongside system audits to evaluate compliance against permit and legal requirements. Where non-conformities are identified improvements and/or corrective actions may result. Audit results are collected and recorded alongside the quality management system results. If the function or operation complies with all the relevant sections of ISO 14001:2015 standard and/or legal and other requirements, then the audit is closed. Where non-conformities are raised the auditor and SHE Team will discuss and agree the corrective action necessary to ensure compliance is achieved and agree timescales for completion. The time set for remedial action will depend on the severity of the non-compliance.

The internal audits and inspections will be planned, and their scope and frequency will be established by the Technical Systems Manager and Team. Audits will be scheduled so that all aspects of environmental management system are audited at least annually.

Each area will be audited on an annual basis. The Internal Auditor will assess the function or operation in conformance to the relevant section of ISO14001:2015, legal, and other requirements and site inspection requirements. A Group Gap Analysis was conducted for the first time in 2021, arranged by the Group Environmental Manager and designed to cover all sections of ISO 14001. Non-conformances and opportunities for improvement were established during the audit and actions raised in SHE Assure as agreed with relevant stakeholders. All actions are now completed and closed.



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Management review

Bradgate Bakery's procedure for reviewing the continuing suitability, adequacy and effectiveness of the EMS will be through several standard agenda items at the biannual Senior Leadership Team (SLT) review meeting. The review is presented by the SHE Team to a variety of stakeholders, including the Site Director, both Senior Production Managers, the Technical Manager, the Supply Chain Manager and the Site Engineering Manager. Key EMS issues are discussed including KPIs, key audit findings, any changes in legislation, communication from any interested parties, and actions are taken.

Inputs for the review include:

- Actions from previous management reviews.
- Evaluation of compliance with legal requirements and other requirements.
- Communication from external interested parties, including complaints or positive comments.
- Extent to which objectives and targets have been met, including performance against the environmental plan.
- Achievements both internally and in the community.
- Status of corrective and preventive actions.
- Any changes in the business which may affect the effectiveness of the EMS.
- Changes in legislation & horizon scanning.

The SHE Team will establish the dates of the meetings and communicate them to the relevant members of staff, giving adequate notice of intent. Minutes and content from the management review meeting are stored within the EMS providing a summary of each meeting. [EMS\10. Management Review \(Clause 9.3\)](#)

Monthly SHE and weekly KPI review meetings are undertaken across both Ashton Green and Madeline Road and across all shifts. These will have a variety of representatives, including Hygiene Manager, Senior Production Manager, and Engineering Manager. In presentations made by the SHE Team, key EMS issues are discussed including KPIs, key audit findings and actions taken. Training will be delivered in some of these meetings in the form of workshops. Information from these meetings is communicated to staff through regular briefings and notice boards.

Inputs for the review include:

- Results of internal audits and evaluations of compliance with legal requirements and other requirements.
- Communication from external interested parties, including complaints.
- Extent to which objectives and targets have been met.
- Status of corrective and preventive actions.
- Follow ups from previous management reviews.

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The output of the review includes decisions and actions relevant to possible changes to audits, audit schedules, SHE Representatives and the action plan. Where appropriate, changes are made to the EMS.

The SHE Team will establish the dates of the meetings and communicate them to the relevant attendees, giving adequate notice of intent. Minutes from the management review are stored within the EMS and will provide a summary of the meeting.

Clause 9 Procedural & Document References

[Internal Audit Schedule \(SHE Calendar\)](#)

[SLT EMS Management Review](#)

[Monthly Environmental KPI Review \(Board Packs and KPI meeting Slides\)](#)

[Compliance Audit Schedule \(within EMS 005 environmental plan\)](#)

Clause 10: Improvement

Bradgate Bakery has the following mechanisms in place to ensure continuous improvement is identified and actioned:

- Internal audit processes.
- CI Process and CI team
- Audits carried out by external stakeholders.
- Management review process
- Complaints and incidents procedures.

Clause 10 Procedural & Document References

QA Quality Management System – discuss with Technical for details.

EMS Files Main Location

[\\samworthbrothers.co.uk\dfs\BRAD\Public\Environmental Management\EMS\1. EMS\](#)

Health & Safety Folders

[YY:\Production\Health & Safety](#)

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