



Sims_Environmental Permitting_Environment Management Systems _ Summary

Sims Group UK Limited (Sims) is a subsidiary of Sims Limited. Founded in 1917, Sims Limited is a global leader in metal recycling and providing circular solutions for technology, and an emerging leader in municipal recycling and renewable energy. Sims Limited operate from more than 260 facilities across 15 countries. Sims Limited has various business divisions including:

- Sims Metal, global leaders in Metal Recycling;
- Sims Lifecycle Services, global leaders in ITAD and e-waste recycling solutions for businesses;
- Sims Municipal Recycling, emerging leaders in curb side recycling in several states in the US; and Sims Resource Renewal, a leading circular business that operates in line with the waste hierarchy by using material left over from the metal recycling process to create new products.

Our purpose, create a world without waste to preserve our planet, is what drives us to constantly innovate and offer new solutions in the circular economy for consumers, businesses, governments, and communities around the world.

Sims Metal is a brand subsidiary of Sims Group UK Limited. Sims Metal Facilities' in the UK currently operate an internal Environmental Management System (EMS) recycling Scrap metal, ELV and WEEE.

Overview

The scope of the internal Environment Management System (EMS) has been considered in accordance with Environment Agency Guidance. In summary, Sims Metal sites have **Operating Techniques** that together with the **EHS Policy, Environmental Risk Assessment, Emergency Contingency and Accident Management Plan, Fire Prevention Plans and Site Infrastructure Plans**, makes up the core of the EMS and meet the requirements of the Environment Agency Guidance.

The management system includes standard operating procedures and safe working practices that minimise the environmental risks and impacts of the normal operations and include contingency plans to minimise the effect of breakdown, accidents etc. These include procedures relating to waste acceptance, directly applicable legislation such as **duty of care** and **hazardous waste regulations** and environmental monitoring.

The Internal Environment Management System

Sims EMS has **management commitment**, including from senior managers.

Sims Metal has an **Environment, Health and Safety (EHS) Policy** which states that Sims are committed to conducting our business in a manner that prevents pollution, protects the environment and promotes the ecologically sound and sustainable use of resources and the minimization of waste. The EHS policy will be reviewed regularly at regional EHS and Operational Director level.

Senior managers **review** the management system to check it is still suitable, adequate and effective.

Reference	Sims Metal EMS Summary	Page number	Page 1 of 4
Authorised by	V Jones	Issue date	April 22 v1



All aspects of the sites operations have been assessed for significance and appropriate **Environment Risk Assessment** (aka Aspects and Impacts) has been carried out as part of the Environmental Permitting application process, where relevant, or as part of day to day operations of existing facilities. Environment Risk Assessment incorporates Fugitive Emissions Management Plans as appropriate. Where requested by the Environment Agency/ Natural Resources Wales, **Noise, Dust, Odour, Pest or Deflagration management plans** are submitted for approval and incorporated into the EMS.

When proposing and considering changes to plant or processes the following are considered:

- environment risk assessment
- technological developments / cleaner technologies

Sims will consider the risks a **changing climate** poses to our operations and will put in place appropriate plans to assess and manage future risks.

The EMS includes the mechanism to fully **investigate environmental incidents** and non-conformances in both normal and abnormal conditions and to record any remedial actions that might be taken and how to prevent re-occurrence. All employees are trained in how to report such occurrences.

Sims Metal has a Hazard Reporting Policy. The objective of this policy is to reduce the likelihood of future accidents, injuries and damages by reporting and acting upon all Near Misses and Hazards. The Management Team ensure 'Hazrep pads' are readily available to all employees and are placed in easily accessible locations. All employees are trained in the Hazard reporting process.

In the event of an incident, details are recorded and a full review undertaken. This review includes the following:

- Cause of the incident;
- Effectiveness of management technique
- Effectiveness of Emergency Contingency Plan and Procedures; and
- Recommendations for management technique and/or emergency procedure to reduce risk of future incidents.
- Share learning from incidents & near misses.

The EMS includes a **complaints procedure**. Any complaints received about site activities are recorded and investigated in accordance with Complaints Log and Investigation procedure.

Sims operates an internal EHS Audit Procedure. The objective of the audit is to check environmental performance and take corrective action as required, to provide guidance, advice and promote awareness to site management at all levels to enable site management to ensure that environment regulatory and company policy / standards are complied with. The audits also act as a means of training relevant personnel. An important objective of the audit is to promote a system of review and continual improvement.

Reference	Sims Metal EMS Summary	Page number	Page 2 of 4
Authorised by	V Jones	Issue date	April 22 v1



The audit procedure is controlled and monitored by the EHS Director along with a team of dedicated, qualified and experienced EHS Partners, Environment Partner and Environment Specialists who are responsible for ensuring the audit procedure is relevant to legislative and business requirements and risks, conducting the internal audit as well as providing or ensuring the provision of relevant training, Work Instructions and Internal Guidance Notes to all employees as relevant.

Sims will compare our site's performance against relevant sector guidance and standards (**Sectorial benchmarking**).

All sites have a site specific **Emergency Contingency and Accident Management Plan**. All sites have a standalone **Fire Prevention Plan (FPP)** or **Fire Prevention and Mitigation Plan (FPMP)**. Drills are undertaken to test the effectiveness of the Emergency Plans and Fire Plans.

Procedures are in place for monitoring and measurement where required by permit conditions e.g. **Point source emissions to water / air monitoring protocols**.

All sites have an **Operating Techniques** that details waste acceptance and inspection procedures, quarantine procedures.

All sites have a **site infrastructure plan** (aka site layout plan) showing site boundary, locations of activities, buildings, drainage infrastructure, emissions monitoring locations where applicable etc.

There are processes in place to plan and establish the resources, procedures, objectives and targets, financial planning and investment needed for environmental performance. Adequate resource is made available to maintain and improve the EMS. Resources include human resources, organization infrastructure, technology as well as infrastructure.

Sims Group UK Limited will have a **training and development** programme designed to ensure that employees are suitably trained to undertake their duties. The roles and responsibilities of employees on site are clearly defined and training records for each employee are maintained and reviewed regularly to ensure competence is maintained and up to date.

Key employees at Site Management level have completed relevant competence assessment & Continuing Competence Assessment as applicable. These employees are resourced as a wider business team and at local level, to attend and to be available to site to ensure that operations are undertaken in line with Sims Policy and Processes and environment permitting requirements.

All training received is recorded on a training matrix and includes details of the training provider (internal and external), type and date of training and where required, the date of any refresher training that may be required. Copies of training records are kept by Site Management.

All employees involved in the operation of manual or mechanical equipment receive the relevant training and are required to follow Safe Working Procedure documentation.

A planned programme of **maintenance for infrastructure, plant and equipment** is part of the management system. All plant is inspected and maintained in line with the legal requirements and

Reference	Sims Metal EMS Summary	Page number	Page 3 of 4
Authorised by	V Jones	Issue date	April 22 v1



the manufacturer's recommendations or other appropriate regime. Maintenance of infrastructure, plant and equipment is carried out by competent people. Records are kept by site management.

All contractors visiting the site receive an induction to ensure that they are aware of the scope of their work, the accident management/emergency procedures for the site and any other management systems appropriate to their role. Work performed by contractors is controlled with application of formal 'Permit to Work' systems.

Tool Box Talks will be used to communicate the EMS systems policies & plans and will be a record of training. Morning meetings, Site EHS Meetings, Regional EHS meetings are other tools available for communication.

Site records will be kept as required by environment permitting, directly applicable legislation and as detailed in operating techniques. A **Site Diary** or equivalent records will be maintained and available upon request.

Sims maintains a **Legal register** to record and monitor legislative requirements.

The EMS will be reviewed if changes are made to site, operations or equipment or after any incident.

On decommissioning / closure of a site or surrender of permits, all actions will be carried out in accordance with a **Site Closure / Decommissioning Plan**.

Reference	Sims Metal EMS Summary	Page number	Page 4 of 4
Authorised by	V Jones	Issue date	April 22 v1