

Summary of the Environmental Management System

DB Cargo (UK) Limited ('DB Cargo' or 'the Company') has in place an Environmental Management System (EMS). The EMS and its associated site-specific procedures will be used by DB Cargo to support the operation of the inert and excavation waste transfer station at Cricklewood Railway Yard, Edgware Road, Cricklewood, London, NW2 6ND (the site) under the Environmental Permit. The EMS has been developed with reference to relevant guidance including "Develop a management system: environmental permits" published by the Environment Agency on the GOV.UK website on 1 February 2016 (last updated 3 April 2023). The EMS itself follows the Plan Do Check Act (PDCA) cycle described in How to comply as illustrated below:



A copy of the EMS is held at the site and is available to all staff and for inspection. A summary of the key elements of the EMS is provided below.

Environmental Management System Manual

The Environmental Management System Manual (EMS manual) provides the central point of reference for the implementation and maintenance of the overall system. The EMS manual includes information on the management structure, staff responsibilities and resource management together with the systemic and operational procedures. The key systemic and operational procedures are provided as appendices to the EMS manual. The EMS provides the key components of an environmental management system and these are set out under the following headings in the EMS manual:

- Environmental and Legislative Background
- Management Structure and Staff Responsibilities
- Resource Management
- Operations and Maintenance
- Emergency Planning and Incident Reporting
- Implementing and Maintaining the Environmental Management System

Company Environmental Policy, Objectives and Targets

The EMS is underpinned by the Company Environmental Policy which outlines how it expects operations to be managed and implemented. Managers and employees are assigned environmental responsibilities and will be expected under the EMS to play a full and active part in managing the aspects of the activities for which they have responsibility.

Register of Legislation

Under the EMS a Register of Legislation will be established and maintained in order to identify the environmental legislation relevant to the EMS and the operations at the site. This will assist DB Cargo in complying with relevant environmental legislation together with the conditions of the Environmental Permit. The Register of Legislation provides a framework in which environmental aspects and impacts together with objectives and targets can be established.

Risk assessment and environmental aspects

The identification of environmental aspects and their associated potential environmental impacts are outlined in the environmental risk assessments (ERAs) that have been prepared to support the application for the Environmental Permit and subsequent application to vary the

Environmental Permit. The ERAs act as the initial review and register of environmental aspects and impacts relevant to the operation of the site under the Environmental Permit. The ERAs and or the environmental aspects and impacts register will be reviewed on at least an annual basis. This review process will be used to update the register of environmental aspects and impacts and to prioritise corrective action.

Management programme

The ERAs have informed the preparation of a suite of operational procedures which together form a management programme for the operation of the site. The management programme comprises:

- Operational procedures (including waste acceptance, dust and particulate matter management, site and plant inspection)
- Planned preventative maintenance
- Accident Management Plan
- Record keeping.

The procedures under the management programme are subject to a similar PDCA cycle as part of the EMS and in the event of any referral, complaint and or reported incident relevant to the procedure. The management programme may be updated at any time in order to implement changes and or corrective actions identified by any management review mechanism. The management programme shall be reviewed regularly and shall be consistent with the legislation identified in the Register of Legislation, the conditions of the Environmental Permit and the Environmental Policy.

Training, competence and communication

The training needs of staff in various posts are identified and a training programme developed so that staff are adequately trained and competent to manage and operate the site under the Environmental Permit. The training programme comprises:

- Site inductions and instructions for contractors;
- Environmental Permit awareness;
- EMS awareness and the importance and application of the EMS;

- General environmental awareness and potential environmental effects from the operations under normal and abnormal circumstances;
- Appropriate operational procedures;
- The need to report deviations from the Environmental Permit conditions and the procedures for reporting; and
- The prevention of routine and accidental emissions and action to be taken should accidental emissions occur.

Records of the status of the training programme together with records of personnel training will be maintained and updated. The training needs of staff and the training programme will be reviewed on at least an annual basis.

The training procedures identify the technically competent person for the operation of the facility and requires DB Cargo to ensure that staff and any contractors working on site possess the appropriate technical competence, skills and knowledge to work on the site. The training procedures require DB Cargo to communicate to staff significant changes to the EMS.

Monitoring and audits

The key aspects of the operations and activities that can have an impact on the environment will be monitored and measured on a regular basis through the procedures outlined in the EMS. All monitoring of operational activities required by legislation, the Environmental Permit or planning consents will be undertaken. The results of the monitoring shall be documented and recorded as specified in the Records procedure.

The results of routine monitoring will be used to inform the annual environmental performance audit which will review the results of the monitoring to evaluate compliance with the Company's objectives and targets and with relevant environmental legislation including the conditions of the Environmental Permit. The audit will highlight issues with any systemic and or operational procedures which need to be addressed as part of the management review. The findings of the audit will be recorded and documented as specified in the Records procedure.

Management review

In order to support its ongoing effectiveness, suitability and adequacy there will be a review of the EMS and its contents at management level on at least an annual basis including:

- The systemic procedures of the EMS including responsibilities, record keeping, training, monitoring and auditing;
- The management programme and the associated operational procedures;
- The Register of Legislation, ERAs and environmental aspects relevant to the operations; and
- The Environmental Policy and the objectives and targets of the Company.