1. PURPOSE

To ensure that all activities on site are carried out in accordance with the environmental permit and appropriate measures. Activities will be managed and operated in accordance with this environmental management system which identifies and minimises the risks of pollution arising from operations, maintenance activities, accidents or incidents and non-conformances.

2. FRAMEWORK

The Site Manager (SM), supported by the internal Compliance Team maintain the EMS system which is in line with the UKAS Accredited Integrated Management System that some WARD sites have in place. The Environment Team ensure that the environmental management system (EB/002) remains appropriate to legislative requirements and specifically the Environmental Permit.

A copy of the management system will be held on site in the Site Office. An electronic copy will also be held on the company server. The company server is located at Head Office in Ilkeston, Derbyshire and is backed up by a third-party company. Copies of the site environmental management system will be made available to the Emergency Services or any interested parties upon request. All permits are available on WARD website in the Duty of Care pack, which is publicly available.

The EMS will be updated if improvements are identified. The EMS will also be reviewed and updated if there are any significant changes to activities on site or associated infrastructure.

3. ENVIRONMENT RISK ASSESSMENT

An Aspects and Impacts register [Environment Risk Assessment] is available. Evaluation is carried out using the criteria noted to identify environmental aspects arising from activities carried out on site to the following receptors:

- Air
- Water
- Land
- Waste Produced
- Use of raw materials
- Local issues

4. COMMUNICATION AND REVIEW

Regular SHEQ meetings are held throughout the year to discuss the sites performance. SHEQ Meetings shall also review any audit findings, complaints, non-conformances, legislation updates, training requirements, contractor and supplier performance. Minutes and actions are recorded.

The SM holds a weekly site meeting to discuss operational issues, plan maintenance, environmental performance, health and safety concerns, near-misses and accidents and provides general training to site staff including toolbox talks.

5. EMERGENCY PREPAREDNESS

The Ward Emergency Contingency Plan identifies potential emergency situations and outlines an action plan to manage the situation including an up-to-date contact list and schematic layout of the site.

The Emergency Contingency Plan is agreed with the Compliance Team and the (SM) will ensure that it is easily accessible, and all requirements are communicated to site staff. The plan should give guidance on: -

- Accidents and First Aid
- Site Evacuation Procedures
- Fires
- Waste Spillage or Leakage
- Incidents on Site e.g. Adverse Reaction
- Heavy Rain & Flooding

The SM will ensure that key personnel are trained with the necessary skills to meet the requirements of the emergency plan. Any equipment e.g. fire extinguishers or alarms, held specifically to deal with emergencies must be fully tested for functionality and records of inspections maintained.

6. AUDITING AND INSPECTIONS

The SM will ensure that Daily Environment, Health and Safety Checks are completed, and all actions are closed out.

The Environment and Sustainability Team undertake regular Environmental Site Inspections to ensure ongoing compliance with the Environmental Permit. Inspections are scored and all actions raised are assigned to a responsible person and a timescale to rectify. If actions are not closed out they will be escalated during the following Environmental Site Inspection and discussed at the site specific SHEQ Meeting.

Following EA inspections, details of CAR reports, including CCS scores are immediately communicated to the relevant people including the Senior Management Team. The SM with support where needed from the Environment Team will action any items raised through CAR's or as part of an improvement programme within a timescale agreed by the relevant regulatory authority.

7. RECORDS AND REPORTING

Ward operates a centralised fully integrated waste management system, ENWIS, that records of all waste received and transferred offsite. An EHS reporting software system is also centralised to support the EMS.

8. COMPLAINTS

All complaints received by the organisation about their activities are recorded and acted upon. The EMS Document, WARD IMS Manual, provides the means for doing this. If the site receives a complaint, the complaint will be logged onto our MY Compliance system, where an investigation will take place to determine the course, and any resolutions or preventatives measures implemented will be logged onto the system. Records shall be available to the Environment Regulator when they visit the site.

9. SITE CLOSURE / DECOMMISSIONING

In the event that operations at Barnsley cease permanently, WARD will implement a formal Site Closure Plan to prevent pollution and return the land to a satisfactory state. The plan will include:

- Notification to Environment Regulator and any other interested parties, of the intent to close operations.
- Cessation of waste acceptance and removal of all residual wastes, fuel, and hazardous substances

to appropriately permitted facilities.
- Drainage and containment verification, including sampling and emptying of drainage infrastructure.

10. COMPETENT PERSONS, RESOURCES, AND TRAINING

WARD ensures that adequate competent persons, resources and training are in place to implement this EMS and the Environmental Permit.

- Competence: Each site has at least one Technically Competent Manager (TCM) holding the appropriate CIWM/WAMITAB qualification and meeting attendance requirements.
- Training: All staff receive induction training covering environmental awareness, pollution prevention, spill response, and emergency procedures.
- Resources: The Site Manager is supported by the Compliance Team and Senior Management.
- Records: Training and competency records are maintained in the MY Compliance and ENWIS systems and audited quarterly.

The adequacy of staffing and training resources is reviewed at each SHEQ meeting and after any incident or regulatory inspection.

11. MANAGEMENT SYSTEM PLAN AND OTHER ASSOCIATED DOCUMENTS

Ward IMS Manual
Emergency Contingency Plan
Fire Prevention Plan

Environmental Control Procedures
EP-PRO-210 Acceptance and Control of Waste Procedure
EP-PRO-233 Inspection of Incoming Scrap Metal
EP-PRO-241 Metal Supplier Status
EP-PRO-243 Waste Rejection
EP-PRO-250 Waste Storage and Handling
EP-PRO-290 Material Out Procedure
EP-PRO-291 Selling Metal for Export
EP-PRO 310 Fuel and Oil Storage
EP-PRO-311 Refuelling of Plant
EP-PRO-312 Maintenance
EP-PRO-315 Site Security
EP-PRO-316-Dust Fibre and Particulate
EP-PRO-318 Noise Control Procedure
EP-PRO-319 Odour Control
EP-PRO-358 Spill Response