



Environmental Policy and Annual Report 2009/2010



C A BLACKWELL (CONTRACTS) LTD ENVIRONMENTAL POLICY STATEMENT

C. A. Blackwell (Contracts) Limited is a construction company operating nationally on major earthmoving and civil engineering contracts. We recognise that our activities have an impact on the environment and are committed to minimise that impact through continually seeking to improve our environmental performance.

The Company will put its Environmental Policy into practice by pursuing the following:

We will:-

Endeavour to meet all the necessary legal and regulatory requirements, in so far as they relate to our business.

Ensure that all our staff and sub-contractors develop a good understanding of the environmental impacts of our business and what is expected of them, and that we take into account the impact of goods and services we buy.

Prevent environmental pollution by effective planning and on-site procedures.

Make efficient use of natural resources by controlling waste, conserving energy and seeking to re-cycle materials wherever possible.

Manage sites and land within our control to mitigate environmental impacts as far as is practicable.

Manage any risk to the environment resulting from our activities, by anticipating such possibilities, being aware of our responsibilities, and by taking a proactive approach to dealing with potential accidents.

This Policy and its objectives will be reviewed by the Board on an annual basis, with targets set for the coming year.



S. R. Clarke

Managing Director

10th March 2010

Commitment No. 1:

We will ensure that we meet all the necessary legal and regulatory requirements, in so far as they relate to our business.

As a Company our practice is always to set out to achieve the highest standards in all we do, and we therefore approach our legal obligations in the same way. We will not only comply with current requirements, but also keep abreast of emerging legislation to ensure that the Company can respond appropriately and in good time - and if need be contribute to the development of such legislation.

This requires us to conform to conditions imposed upon us which relate to the work we do, e.g. Planning Consents, Water Abstraction Licences, Waste Disposal, Noise at Work, Storage of Flammable Liquids, etc.

In order to meet our obligations, both under the law and to our employees, we have therefore identified and recorded Environmental Legislation which is relevant to the Company, and have ensured that we have appropriate procedures in place for:

- communicating this information to those that it may affect
- ensuring that individuals receive adequate training and guidance
- controlling documentation and records

All employees and sub-contractors are required to ensure that they do not knowingly act in such a way as to cause a breach of legislation, and that they take due care to avoid any circumstances which may ultimately cause a breach of legislation.

With regard to emerging legislation, the Board will ensure that:

- adequate information and resources are made available to managers of the Company to formulate an appropriate response and action plan to meet any forthcoming legislation
- Company representatives participate, either through Construction Industry associations or independently to Government consultation.

The Company will audit legislative compliance issues.

Consequences of Failure to comply with the above could result in

- Damage to the Environment
- The Company being subject to legal action resulting in major fines.
- Individuals being held accountable for their actions - both to the Company and to the law
- The Company being sued for damages by organisations such as Fishing Clubs
- Our reputation being severely damaged, and this in turn affecting our ability to secure future business
- Our inability to influence the shape and form of regulation, and
- The Company suffering extra expense by complying retrospectively.

Commitment No. 2:

We will endeavour to ensure that all our staff and sub-contractors develop a good understanding of the environmental impacts of our business and what is expected of them, and that we take into account the impact of goods and services we buy.

The Company is committed to maintaining an informed workforce, and ensuring that it is able to meet the standards that we set for all our activities.

The Company will:

- Ensure employees and sub-contractors of the Company are made aware of the Environmental Policy and given information enabling them to understand their responsibilities and obligations.
- Periodically review training needs related to the Environmental Policy and identify appropriate training and guidance as required.
- Set aside financial and management resources to ensure adequate training is delivered.
- Maintain training records.
- Develop procedures for adopting environmental best practice when buying goods and services.

Consequences of Failure to comply with the above could result in

- Damage to the Environment
- The loss of our reputation
- Enhanced risk of an environmental incident
- The loss of the opportunity to be increasingly responsive to environmental issues, and
- The risk of financial costs

Commitment No. 3:

We will prevent environmental pollution by effective planning and on-site procedures.

This commitment focuses our efforts on being ever more effective at finding ways of improving our performance in relation to the pollution we inevitably cause. This covers a number of areas, e.g. noise, dust, visual impact, vibration, smoke, exhaust gases, pollution to water, quality of life, materials sent to landfill, etc.

Therefore we must:

- Take all possible, safe and practical steps to stop and suppress dust emissions by good management techniques.
- Minimise the burning of site clearance and/or demolition arisings and maximise the recovery and recycling of materials.
- Wherever possible seek to reduce the use of compounds that produce V.O.C.s (Volatile Organic Compounds).
- Ensure plant and vehicles are regularly checked, maintained and serviced in accordance with the manufacturer's guidelines in order to minimise exhaust emissions.
- Reduce noise wherever possible by the creation of noise barriers around static plant, and the use of plant maintained to the manufacturer's guidelines.
- Monitor noise levels where necessary.

Consequences of Failure to comply with the above could result in

- Damage to the Environment
- The Company (and its employees) being prosecuted or sued
- The Company incurring unnecessary costs
- Our becoming uncompetitive, or
- Our suffering a serious PR disaster, resulting in a loss of credibility and commercial confidence

Commitment No. 4:

We will make efficient use of natural resources by controlling waste, conserving energy and seeking to re-cycle materials wherever possible.

The Company is committed to continual improvement of its operational performance, and every reasonable effort is made to make the most efficient use of natural resources in order to obtain the most benefit to the Company with the least pollution and adverse effect on the environment.

All materials should be disposed of safely in compliance with current legislation, particularly the Waste Management Licensing Regulations, the Hazardous Waste Regulations, List of Waste Regulations, the 'Duty of Care' Regulations and our own procedures.

In legal terms waste which we handle is classified as:

'Inert Waste' - which is clean, will not burn, biodegrade or chemically react, such as indigenous material - which will not leach in a landfill site.

'Non Hazardous Waste' - which is generally any waste included in the European Waste Catalogue (EWC) that is not marked with an asterisk.

'Hazardous Waste' - which is potentially hazardous to living things and the environment, and must be disposed of separately from Non Hazardous Waste. Hazardous waste is identified in the EWC as Absolute or Mirror entries denoted by an asterisk and we pay significantly more for the disposal of hazardous waste than we do for Non Hazardous and Inert waste.

Areas which require our constant attention and ongoing monitoring are

- When ordering materials of any kind avoid wastage by ensuring that the correct quantity is ordered, or that there is minimum wastage allowance for construction materials. Introduce correct handling methods and proper storage to avoid damage.
- Ensure the most efficient use of petrol, diesel and gas oil by following the latest procedures laid down in the Company Health and Safety Manuals.
- Ensure that whenever practical materials are re-cycled, and by value engineering better use is made of naturally occurring hard materials, together with materials within existing constructions.

Consequences of Failure to comply with the above could result in

- Damage to the Environment
- The Company (and our employees) being prosecuted
- The Company being subjected to unnecessary costs
- Our becoming uncompetitive, or
- We could suffer a serious PR disaster, resulting in loss of credibility and commercial confidence

Commitment No. 5:

We will manage sites and land within our control to mitigate environmental impacts as far as is practicable.

The Company has for some time recognised the potential and actual effects of its works on the landscape and ecological environment. In order to minimise these effects the Company encourages the use of on site solutions for surplus disposal and/or maximising the potential uses of site won materials.

There are a number of considerations related to this commitment:-

- Where land is acquired for the purpose of the extraction or disposal of materials in connection with construction activities, we will seek to minimise disruption and risk to local residents.
- Locate disposal, storage or extraction sites such as to reduce the volume of traffic otherwise using public highways.
- Design and operate extraction and disposal sites so as to make optimum use of the landtake and whenever possible to ensure beneficial after-use.
- Wherever practicable take measures to lessen the visual and audible impact of extraction and disposal sites.
- Undertake work in such a way as to preserve and protect the indigenous ecology and habitat insofar as it is practicable and cause least damage to the environment as a whole.

Consequences of failure to comply with the above could result in

- Damage to the Environment
- The Company being hampered or failing to secure planning consent for disposal or extraction sites
- Our being subject to enforcement notices resulting in lost credibility
- The Company suffering a major PR disaster, resulting in lost credibility by local authorities and clients
- Our being subject to legal action resulting in major fines, or
- Our being excluded from tender lists resulting in lost business opportunities

Commitment No. 6:

Manage any risk to the environment resulting from our activities, by anticipating such possibilities, being aware of our responsibilities and by taking a proactive approach to dealing with potential accidents.

The Company fully recognises that in the work we do there is a significant risk of environmental incidents. We therefore already have, through our Health and Safety Policy, well established procedures covering risk assessments, method statements and our legislative obligations, and we will continue to monitor these procedures.

In order to mitigate these risks, we will:-

- Ensure compliance with the E.A.'s requirements, by preventive maintenance of storage tanks and bowsers, and the use of adequate temporary ditches and ponds for the control of site run-off water.
- Each Contract will have an appropriate CAB emergency plan, drafted prior to commencement of work on the site. This plan will take into account an environmental risk assessment of all local conditions, together with the emergency plans of the main contractor (if appropriate).
- Regularly review and update emergency plans for our site offices and depots.
- Employees and sub-contractors will be notified of the emergency plan requirements.
- Appropriate equipment, identified as necessary for mitigating a potential environmental emergency, will be strategically located on site, and employees trained in its use.
- Specific hazards will be appropriately identified by signs or notices.
- Working practices will be regularly reviewed to ensure good practice is adopted at all times, e.g. for refuelling.
- Hazardous, explosive and dangerous materials will be stored securely and operatives trained in their safe use.
- Liquids, such as fuel oil, will be stored in areas where spillages can be contained in line with construction industry best practice.

Consequences of Failure to comply with the above could result in

- Damage to the Environment
- The Company (and its employees) being prosecuted or sued
- The Company incurring unnecessary costs
- Our becoming uncompetitive, or
- The Company suffering a serious PR disaster, resulting in a loss of credibility and commercial confidence

ENVIRONMENTAL REPORT – 2009

We are continuing to move forward in our overall environmental performance through both technical and system improvements.

Six primary Objectives and Targets were set by the Board of Directors for the year 2009. These, together with the achievement levels, were as follows:-

1. **To work towards zero incidents of water pollution**
We had one reported water incident during the year, which had the potential to cause damage to the environment.
2. **To introduce working practices to bring about lower polluting thresholds from the use of earthmoving plant.**
The plant purchasing policy within the fleet to Euro IIIA standard has continued increasing fuel economy, reducing emissions and extending service intervals.
We have monitored our carbon footprint in 2009 and continue to refine the measurement process.
The target to introduce a car purchasing policy, to ensure all new cars have CO₂ emissions of 160g/l or less has been met.
3. **To train operational management in their specific responsibilities under the Environmental Management System.**
This target is yet to be fully achieved – but is ongoing.
The training of each Foremen/Ganger remains ongoing.
The education of staff in updated Environmental Management System processes is continuing.
The training of staff in the use of noise monitors and environmental monitoring techniques has yet to be fully achieved.
4. **To work towards zero incidents of land pollution with fuel and mineral oils.**
We have maintained our policy to include low level, quick coupling facilities for the transfer of fuel, when purchasing new plant.
5. **Increase the use of recycled materials and products.**
We have continued to develop opportunities to recycle site won materials throughout the year.
We have yet to install and commission further recycled oil heating provision at Earls Colne.
6. **To work towards zero complaints regarding noise/vibration and dust.**
We achieved our target to have no noise, vibration or dust incidents during the year.
We have continued to promote the Considerate Constructors Scheme
The programme to install 'white noise' reversing alarms on earthmoving plant has been maintained

There was one Environmental Complaints/Incidents during the year. The complaint arose following a flash storm that resulted in site run-off into the Bedale Beck adjacent to the A1D2B contract. A schedule of protective measures were agreed and promptly implemented.

In accordance with our Environmental Programme we have maintained our monitoring of fuel consumption, muck movement volumes and services carried out against machine working hours. We have also continued to monitor our V.O.C. purchases and despite an increase in volume used over the last year, current usage remains below the 1999 benchmark level.

Overall we are seeing improvements to our environmental performance with the number of environmental complaints and incidents reduced over the past year. To move forward we must continue to promote and encourage environmental awareness and ensure that the application of our environmental management system is effective.

S. E. Jones,
Environmental Manager

February, 2010

OBJECTIVES AND TARGETS FOR 2010

In accordance with the Environmental Policy Statement, the following Targets have been set, and formally agreed by the Board of Directors, for the next twelve months.

1. Work towards zero incidents of water pollution.
 - To have no water incidents which lead to damage to the environment.
2. Introduce working practices to bring about lower polluting thresholds from the use of earthmoving plant and transport vehicles.
 - Maintain a plant purchasing policy to ensure that new plant is to Euro IIIA standard or better.
 - To establish the carbon footprint baseline for the company's operations/activities.
 - Work with recognised industry authorities to develop a better understanding of carbon emissions arising from earthworks activities.
 - Monitor the relative performance of the hybrid vehicle against current diesel vehicles in the fleet.
3. Train site supervision in their specific responsibilities under the Environmental Management System.
 - All Site Managers are to receive EMS training from Contracts/Divisional Managers supported by SHEQ department representatives.
 - Each Foreman/Ganger to receive EMS training by trained Site Manager.
 - Educate staff in updated Environmental Management System processes.
 - Train staff in the use of noise monitors and environmental noise monitoring techniques
4. Work towards zero incidents of land pollution with fuel and mineral oils.
 - Maintain a purchasing policy to include low level, quick coupling facilities for the transfer of fuel when purchasing new plant.
5. Increase the use of recycled materials and products and reduce waste.
 - Continue to develop opportunities to recycle site won materials.
6. Work towards zero complaints regarding noise/vibration and dust.
 - To have no noise/vibration or dust incidents which are detrimental to the environment.
 - To promote the Considerate Constructors scheme.
 - To maintain the programme for the installation of 'white noise' reversing alarms on earthmoving plant.
7. Maintain Environmental Management System to current ISO 14001 Standard
 - To review, update and refresh the Environmental Management system processes.
 - To maintain the Environmental Management System up to ISO 14001: 2004 Standard.



S. R. Clarke

Managing Director

Date: 10th March, 2010