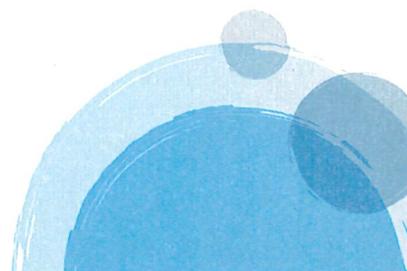


Environmental Policy

20 January 2010

Last reviewed: 15 November 2024



Policy Statement

Pellikaan Construction Ltd (Pellikaan) seeks excellence in every aspect of its business. We are committed to minimising environmental impact of business operations and to reducing contribution to climate change.

We operate our business in an environmentally sensitive and caring manner and our policy approach forms part of our overall business strategy. It communicates Pellikaan environmental aims and objectives to customers, employees, suppliers, and stakeholders.

All Pellikaan staff are expected to comply with our Environmental Policy and demonstrate commitment to its effective implementation and continuous improvement in environmental performance.

Pellikaan fully supports the principles of sustainability, prevention of pollution and compliance with all relevant legal requirements.

The latter includes applicable primary (Acts or Orders) and secondary (Regulations) legislation and includes (although the following is not intended to be exhaustive):

- The Environment Act 2021
- Environmental Protection Act 1990
- DEFRA Waste Duty of Care Code of Practice (March 2016)
- Hazardous Waste (England and Wales) Regulations 2005
- Waste Electric and Electronic Equipment (WEEE) Regulations 2013
- Control of Pollution (Oil Storage) (England) Regulations 2001
- Control of Asbestos Regulations 2012.

We strive both to comply with all applicable legislation, regulations and codes of practice, and better them wherever possible.

Pellikaan is also committed to continual improvement of working practices so that resulting environmental impacts are progressively reduced.

Pellikaan has ISO 14001: 2015 accreditation in place, and compliance and application of best practice is driven by our comprehensive Management System.

Our system is harnessed to risk assess, manage, and reduce our potential impacts on the environment. It assesses/ provides:

- **Environmental aspects**, covering direct and indirect impacts on the environment.
Direct aspects are those over which we have a high degree of control or can reasonably be expected to have an influence. These include (for example) aspects such as emissions to the air, releases to water, waste management, contamination of land, uses of raw materials and natural resources, other local environmental and community issues.
Indirect aspects – which are those largely beyond our control. These include, for example, aspects of our suppliers' or subcontractors' use and disposal of products.
- **Environmental impacts**, such as greenhouse effect, ozone depletion, consumption of natural resources, soil and groundwater, and ecological habitat.
- **Risk analysis and risk management strategies** based on typical environmental and business concerns and taking into account (from an environmental perspective) potential scale of impact and severity, probability of occurrence and duration of the impact.

- **Emergency procedures**, for dealing with environmental hazards or incidents arising from our operations.
- **Environmental, social, and economic sustainability.** Pellikaan aim to provide a long-term, integrated approach to addressing economic, environmental and social needs, whilst avoiding the overconsumption of key natural resources. This will create a better environment, support local communities, and provide our customers with better, sustainable solutions.

We will carry out ongoing reviews of our EMS. We aim to ensure Pellikaan operations comply with applicable environmental legislation and achieve higher levels (where possible) of environmental performance.

Scope

This policy applies to all employees of Pellikaan and is applicable at all levels within the business.

We also aim to have a positive impact through our supply chain and will seek, wherever possible, to achieve this. In particular, the environmental policy approaches of subcontractors must fully reflect those adopted by Pellikaan. We will ensure compliance through examination of subcontractor policies, induction to our own policy approaches, site audits, and provision of any necessary training.

Policy objectives

Pellikaan is committed to:

- Demonstrating control of all operations, ensuring all performed with due consideration of the environment.
- Reducing our consumption of resources (including energy, water, raw materials, and packaging) and improving efficiency in the use of these resources.
- Managing business operations to prevent pollution and minimise emissions.
- Ensuring that staff conduct their business with respect and care for the environment – through appropriate planning, implementing and monitoring using best practical means.
- Ensuring environmental considerations are taken into account in the procurement of goods and services (including those provided by subcontractors).
- Compliance with all relevant environmental legislation and applicable local regulations.
- Consideration of environmental issues in the design, construction and location of buildings, seeking new materials from sustainable sources where appropriate.
- Using products that have negligible environmental impact, where appropriate options exist.
- Working with Customers, Architects and other Designers to influence choice of materials or build methodology to achieve a more environmentally friendly and sustainable alternative wherever possible.
- Working proactively in partnership with Customers (such as Local Authorities – for example, in complying with local codes of practice) to contribute to local and regional environmental and sustainability targets.
- Managing waste generated from our business operations according to the hierarchical approach of eliminate at source, reduce, reuse, recycle and dispose.
- Continuous improvement in environmental performance and integration of recognised, applicable best practice into our business operations.
- Continuous improvement, managing incidents, site inspection, identification management and control of environmental aspects.

Policy Implementation

In implementing this policy, we will:

- Identify all environmental impacts that the business contributes to, establishing management processes that can be incorporated into all business decisions, in a cost-effective manner.
- Ensure that site-specific environmental management plans and waste management plans are in place for each construction project.
- Carry out role-specific environmental protection measures, which are integrated into our separate Safety, Health and Environmental Policy.
- Ensure that trained staff manage tasks such as refuelling plant and equipment, managing stores, segregation and collection of waste.
- Adopt good construction management practices which reduce risk of accidental discharge of pollutants into rivers, streams or ponds or of accidental contamination of groundwater.
- Ensure that emergency procedures are integrated into environmental management plans which cover responses to accidents and incidents and prevent or mitigate adverse environmental impacts.
- Regularly measure and evaluate environmental performance (for example, in respect of energy usage and waste production), ensuring that any targets set are achieved together with continuous improvement.
- Promote a culture of participation and continuous improvement within the business.
- Provide sufficient resources to manage our impacts effectively.
- Communicate internally and externally our Environmental Policy and performance, encouraging feedback and ideas and harnessing the latter where appropriate to enhance future performance.
- Communicate the importance of environmental issues and sustainability to all our people.
- Encourage staff to work in an environmentally and socially responsible manner, through which they respect and have an appreciation of the resources (materials, fuel, energy etc.) that underpin Pellikaan operations.
- Conserve biodiversity by protecting wildlife, flora and fauna habitats wherever possible on and surrounding the works site. We aim not to disturb this with noise, vibration, dust or otherwise & will minimise effects of existing pollution and environmental damage by investigating ground conditions prior to start of works.
- Empower staff to manage implementation of the policy at appropriate levels within the business.
- Reduce carbon footprint and energy consumption. The Pellikaan Carbon Management Plan sets out our commitment to reduce carbon emissions associated with our design and build operations.
- Encourage staff to turn off equipment, heating and lighting when not required.
- Use low energy, PIR-controlled lighting in our head office and recycle all paper, print cartridges, supplier packaging and similar materials in all offices.
- Reduce the use of paper within our offices by sharing and filing documents electronically.
- Provide recycling bins for wastepaper, cardboard and plastic bottles used within the business.
- Ensure correct disposal of computers and other electrical equipment – offering the same to schools or staff or commissioning a licensed waste management company to safely recycle or dispose of broken/obsolete equipment/components in line with WEEE Regulations 2013.
- Increase awareness of environmental matters through issue of our policy to all staff, customers, and subcontractors – providing a thorough induction to staff and subcontractors and ongoing awareness training in compliance and application of best practice.
- Provide tailored training to staff, which reflects job role and associated environmental responsibilities.
- Identify and mitigate against potential accidents (including through chemical/hazardous substance use) that could result in adverse environmental impact, so that if an accident did occur the consequences could be minimised.

Pellikaan will also:

- Ensure in cases where asbestos is present in an existing building and modifications are taking place: Location, type and condition is identified from the Asbestos Register; Appropriate risk assessment and management takes place; Where materials are in good condition and not likely to be damaged, they are left in place with condition monitored and managed to ensure not disturbed; Any removal is undertaken by a licensed contractor (including past works with sprayed asbestos coatings, asbestos lagging, most work with asbestos insulation and asbestos insulating board).
- Prevent waste from escaping from our control by using containers that are: Clearly and correctly labelled; Suitable for storage, transport, and subsequent removal; Designed to prevent leakage, contamination or spoiling of waste.
- Ensure hazardous (i.e., potentially harmful to human health or the environment) and non-hazardous waste are: Stored separately and securely; Correctly classified and removed safely, responsibly, and effectively from site by licensed waste carriers.
- Ensure records (consignment notes/ consignee returns/ any related documents) are kept in respect of hazardous waste and that waste carriers: Use covered vehicles; Secure waste appropriately for the purpose of transport; Use destination waste sites that have environmental permits.
- Ensure where oil & fuel stored on-site exceeding 200 litres that: It is held in tanks, drums or containers strong enough to hold the oil/fuel without leaking or bursting; It is positioned away from any vehicle traffic to avoid damage and potential spillage from collision; Secondary containment is used (e.g. bund or drip tray), that this is of sufficient capacity and impermeable to water and oil; All other technical standards of the Control of Pollution (Oil Storage) (England) Regulations 2001 are met.

We will seek to ensure subcontractors adopt Pellikaan environmental approaches detailed within this policy above and:

- Use wood from sustainable forests wherever possible.
- Adopt environmentally sound storage and disposal of solvents and petroleum-based products.
- Use water-based or low-solvent paints and coatings wherever possible.
- Aim to reduce the nuisance effect of construction operations with regards to noise, dust, fumes, light and vibrations.
- Reduce spread of dust and air pollution, wherever possible, by spraying sites to dampen them down. We will also use screens and mesh to prevent spread of dust.
- Adopt accurate forecasting of materials and resources, avoiding waste wherever possible and minimising the environmental footprint of multiple deliveries to site.
- Recycle waste from construction works wherever possible.
- Share staff use of vehicles and conduct accurate route planning to reduce carbon footprint.
- Utilise recycled heavy-duty bags for site waste.
- Consider purchase of boilers, showers, toilets, sinks, heaters and electrical fittings on the basis of their environmental friendliness.
- Use plant and equipment only when necessary.
- Use low-sulphur diesel to power plant (where applicable and possible) and filters and converters.
- Participate in the environmental policy making process.
- Participate in onsite Toolbox Talks – which include risk assessment and mitigation, application of environmental good practice & working with minimal disruption to flora and fauna (as well as site-specific health, safety & welfare).

We will also apply robust approaches to ensure that subcontractors operate in an environmentally sustainable manner.

Policy review

Pellikaan will review and update this policy periodically and at least annually, ensuring continued compliance and application of environmental best practice.

Complaints procedure

Any environmental complaints will be taken seriously and immediately investigated by the Site Manager in a customer-focused manner. He/she will report findings to the Pellikaan Contract Manager who will liaise with the customer where necessary and act as a management control to ensure any necessary corrective action taken.

Our approach will be three dimensional and highly effective – to investigate, take action and communicate.

Complaints may be made verbally or in writing and by employees, customers, subcontractors, suppliers and people and businesses in the proximity of construction operations.

The complainant will be made aware of investigative and corrective action taken by Pellikaan and of how this has been communicated to other individuals where latter has been necessary.

Any corrective action will be taken swiftly, and the complaint recorded within our management system, which will be periodically examined by our Senior Management Team to ensure that any developing trends are identified and corrected at an early stage.

Continuous improvement

As indicated throughout this policy, we are committed to continuous improvement in environmental performance. We will achieve this by setting SMART targets for continued reduction in environmental impact and through regular internal audit of our operations.

We shall also achieve this through regular policy review and benchmarking against best practice.

Responsibility and authorisation

Our Managing Director carries responsibility for environmental performance of the business and has signed this policy as such.

Signed: 

Date: 20 January 2010
Last reviewed: 15 November 2024
Name: Gert-Jan Peeters
Designation: Managing Director