



# Environment Policy

1 December 2023

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# 1. Environmental Policy Statement

This policy applies to all areas and operations of all T-Prime Limited undertakings. T-Prime Limited principal operations are undertaken within the commercial sector for various clients. We recognise that our operations interact with the environment and are firmly committed to eliminating or reducing adverse impacts. In particular, T-Prime Limited will achieve this throughout commitment to:

- Comply with all relevant environmental legislation and regulations
- Review the actual and potential environmental impacts for all activities
- Strive for continual improvement in environmental performance through setting objectives and targets and developing key performance indicators
- Employ best practice to prevent pollution, minimise waste and maximise the efficient use of resources (materials, fuel and energy)
- Identify and manage key risks and have arrangements in place to respond to all foreseeable incidents and emergencies
- Involve Employees and Contractors in our environmental programmes and provide training to enable them to discharge their responsibilities
- Engage in communication with suppliers to encourage their participation in environmental best practice
- Produce an annual environmental report to set out progress to Employees, Regulators, Clients, Suppliers and other interested parties
- Procuring timber products with FSC – Certification

Every employee has an individual responsibility to help meet the requirements of this policy. All constructive ideas for minimising adverse environmental impact can be discussed with your supervisor, our H&S Manager or me directly.

Signed 

**Anatolie Teterea**

Director for the co-ordination of Environmental Issues T-Prime Limited

Dated: 1 December 2023

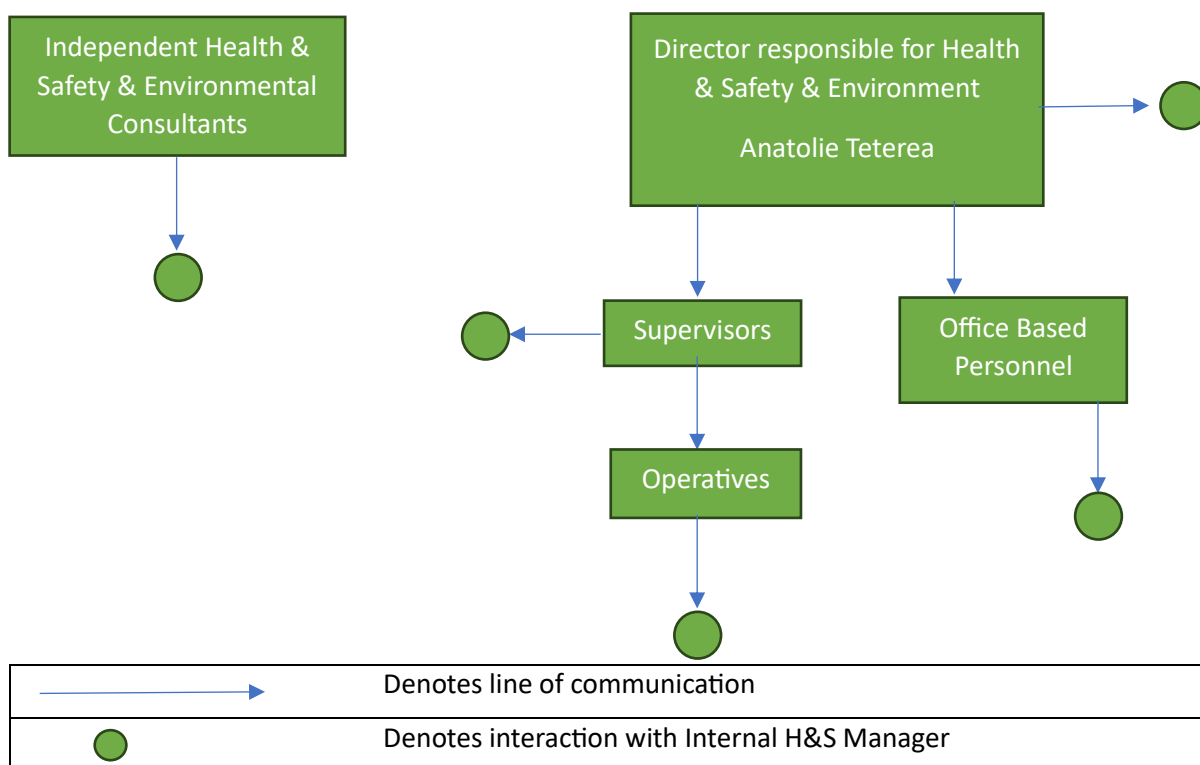
This policy will be reviewed on an annual basis, or;

If there is a reason to suspect that it is no longer valid, or;

If there has been significant change in the matters to which it relates.

## 2. Organisational Arrangements

### 2.1. Organogram



### 2.2. The responsibilities of Anatolie Teterea

Anatolie Teterea has overall responsibility for ensuring that all employees understand their role, accountability and involvement in contributing to meeting the aims and objectives of the company's environmental policy.

Further responsibilities

- To ensure that an environmental policy has been prepared and to update and review at regular intervals
- To ensure that the organisations vision and direction in relation to environmental aspects is consistent with current socio-economic factors
- To agree and endorse the environmental policy and corporate objectives of T-Prime Limited
- To develop policy commitments, review action plans and environmental targets
- To ensure that the organisation complies with all statutory legal requirements
- To monitor environmental performance, management systems and internal procedures
- To develop targets for procurement and requirements of stakeholders, contractors and suppliers
- To ensure regulatory compliance and continual improvement in all environmental aspects
- To identify employee training needs and maintain an environmentally aware workforce
- To ensure that employees of T-Prime Limited comply with the requirements of the Site Waste Management Plan (SWMP)

### 2.3. The responsibilities of the consultants

- To provide professional advice and support to T-Prime Limited on environmental issues, aspects and legislation
- To develop, when requested, environmental procedures, programmes and achievable targets

- To review overall environmental performance, identify weaknesses and make appropriate recommendations to Anatolie Teterea
- To inform Anatolie Teterea of any relevant changes to environmental legislation and industry guidance

## 2.4. The responsibilities of the Supervisors

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement
- To promote the company’s environmental policy and general awareness of the adverse environmental impacts
- To ensure Employees are informed and aware of any specific environmental aspects of their work activities
- To ensure Employees undertake work processes in accordance with the company policy and any training received
- Collect and submit to Anatolie Teterea data and results of environmental performance

## 2.5. The responsibilities of the Employees

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement
- To promote the company’s environmental policy and general awareness of the adverse environmental impacts
- To ensure work processes are undertaken in accordance with the company’s environmental policy and any training received
- To inform the company of any areas of environmental management that may give rise to concern

# 3. Arrangements

## 3.1. Aims and Objectives

The aims and objectives of T-Prime Limited are to ensure that the environmental aspects of the company’s undertakings do not have any adverse environmental impact. Where it is not possible to eliminate the impact, to reduce or minimise the environmental impact by the use of recycling, waste separation and other techniques. T-Prime Limited recognises that an essential management principle is that objectives and targets aim to be “S.M.A.R.T”

<b>Specific</b>	Objectives and targets should be clear in their intention and results. Specific responsibilities should be assigned to individuals.
<b>Measurable</b>	Performance indicators should be used to assess quantifiable results so that the degree of achievement or failure can be identified.
<b>Agreed</b>	All stakeholders and individuals involved or responsible for environmental aspects and achieving targets should have an opportunity and comment on it.
<b>Realistic</b>	Targets and objectives should be achievable in relation to resources available and other business priorities, but not too easily reached.
<b>Time-based</b>	Targets and objectives should be achieved in a given and known time frame. If the objective time period is many months or years monitoring of progress should be undertaken.

### 3.2. Air

T-Prime Limited will ensure, through its maintenance and purchasing programme, that site mobile machinery meets the emissions of gaseous and particulate pollutant levels outlined in various E.U Directives and that continuous improvement is achieved. Most works are undertaken in the open air except in high winds or unusual locations.

### 3.3. Communication

Effective two-way communication between employees at all levels is seen by T-Prime Limited as an important part of ensuring the protection of the environment. T-Prime Limited will work with all persons affected by their undertakings to ensure that information on environmental aspects and impacts shared. Communication with Employees will take various forms and Employees are reminded that they may raise any environmental issue with any member of management in total confidence. Employees are actively encouraged to raise any concerns they may have in relation of environmental aspects.

### 3.4. Contaminated Land

T-Prime Limited does not undertake operations that affect or disturb land.

### 3.5. Energy Conservation

Increasing energy costs, coupled with both National and Governmental needs for energy conservation, has resulted in “energy management” being regarded as an important task in all work activities undertaken by T-Prime Limited. T-Prime Limited recognises that energy efficient measures can be achieved through the correct selection of appropriate plant and equipment. Energy saving requirements may also involve such things as ensuring a piece of plant has completed all necessary tasks before being withdrawn from a project as its return to site at a later date will result in poor logistic management and added pollution. All persons involved at the planning or tendering stage of projects will fully consider all possible areas of energy reduction and conservation.

### 3.6. Environmental Protestors

At T-Prime Limited we consider that, through the implementations of this policy document, we are doing our practicable utmost to protect the environment during all our activities. However, should we ever experience the onset of environmental campaigners onto any one of our work sites, we shall attempt to deal with them in the most respectful and considerate manner possible. It is, of course, our primary interest to allow our employees and sub-contractors to work without fear of verbal abuse and physical violence from individuals who may disagree with our work methods, chosen locations or motives. It will therefore be the responsibility of our site management to contact the police immediately in the event of protestors congregating on, or around, any of our work sites. Our security measures shall always be of a sufficient extent to prevent the entrance of

intruders onto our work sites. Should an unauthorised individual happen to gain access to a work site there is a distinct possibility that they could be injured by a hazardous process or item of plant/equipment. It is therefore in the interest of safety (to both our employees and unauthorised persons) that intruders shall be prohibited from entering any of our work sites where work activities are taking place. Should any environmental campaigners wish to peacefully scrutinise our methods of work we shall be glad to provide them with documented proof that our concerns lay very much within the preservation of our environment, as outlined in the contents of this policy.

### 3.7. Local Community Engagement

T-Prime Limited accepts that, although the community may not have a direct relationship with our projects, it is nevertheless impacted by our work activities and the resultant infrastructure. Any complaints we receive about our activities are responded to quickly and recorded so that we can improve our performance. Because we recognise that our activities can sometimes be disruptive, increasingly we (with the assistance of our clients) are adopting pro-active community engagement activities. This involves informing our neighbours of our activities and ascertaining if there are any key sensitive dates or events for the local community.

### 3.8. Noise

T-Prime Limited will undertake to work within the parameters outlined by the Client or the Local Authority to restrict noisy activities to the time periods requested. All controls will be applied including a rigid maintenance regime, sufficient damping, lagging and other acoustic controls to ensure the reduction of noise. T-Prime Limited will undertake to act proactively, to ensure the elimination of unnecessary noise and to reduce noise that is produced to an acceptable level. Whenever possible noise will be reduced or eliminated by modifying machinery. We shall attempt to achieve this by maintaining equipment in good operation and encouraging our staff to report noisy equipment to our supervisors when it requires attention. Best Available Techniques (BAT) will be used to prevent the effect of noise to the limit reasonably practicable having regards to the local conditions and circumstances, to the current state of technical knowledge and to the financial implications.

### 3.9. Office Waste

Through careful and efficient office management and the implementation of a quality system, the amount of waste created is kept to an absolute minimum. T-Prime Limited is also promoting the recycling of office waste wherever possible. Electrical energy is conserved by the use of high efficient, fluorescent lighting which is switched off in rooms which are not in use. Natural gas energy used in heating systems is conserved by regular maintenance, servicing and individual thermostatic controls.

### 3.10. Preventing Fly Tipping of Site Waste

T-Prime Limited is committed to dealing with improving local environmental quality and tackling waste crime, such as fly-tipping. We acknowledge that the illegal disposal of waste is an anti-social behaviour that is adversely affecting the amenity of our local environments and reducing civic pride. Fly-tipping can lead to serious pollution of the environment and harm to human health. It can cost innocent victims of fly-tipping and public bodies such as local authorities and the Environment Agency large amounts of money to remove the waste.

To prevent fly-tipping, producers of waste must ensure that it remains under their control until correctly disposed of. Contractors are to arrange for the removal of their waste by a registered waste carrier or to a

licensed landfill site, in accordance with the Duty of Care provisions of the Environmental Protection Act 1990. A Waste Transfer Note (WTN) must be created for each load of waste that leaves our sites. The WTN will contain enough information about the waste to enable anyone coming into contact with it to handle it safely and either dispose of it or allow it to be removed whilst maintaining compliance with the law. We shall describe on the WTN, both in words and by reference to the appropriate codes in the European Waste Catalogue (EWC), the quantity and types of each difference waste being transferred.

The WTN will also include details of how the waste is contained (i.e. loose or packaged and if packaged, then in what type of containers). T-Prime Limited shall never rely on waste carriers or waste management contractors to describe our waste for us on WTN's. We, as the producer, are in the best position to accurately describe our waste. T-Prime Limited will keep copies of all WTN's for at least two years. Whatever the destination of our business wastes and whichever organisations are handling them, it will help us to prove that we have properly discharged our Duty of Care by undertaking periodic audits. This will enable us to ensure that our wastes are being handled correctly from the moment they leave our premises to the final point of disposal or recovery.

### **3.11. Preventing Fuel Entering Adjacent Watercourses and Drainage Systems**

The risk of spillage is at its greatest during refuelling of plant. T-Prime Limited will adopt the following precautions to prevent fuel spillage entering watercourses:

- Where possible, we shall refuel mobile plant in a designated area, preferably on an impermeable surface and away from any drains or watercourses.
- Keep a spill kit available
- Never leave a vehicle unattended during refuelling or allow our staff to jam open a delivery valve.
- Check hoses and valves regularly for signs of wear and ensure that they are turned off and securely locked when not in use
- Diesel pumps and similar equipment shall be placed on drip trays to collect minor spillages. These will be checked regularly and any accumulated oil be removed for disposal.

In the event of a spillage on site, the material shall be contained (using an absorbent material such as sand or soil or commercially available booms) and the Environment Agency will be notified immediately.

### **3.12. Prevention of Pollution from Plant and Machinery**

In order to prevent materials leaking from static plant, such as company vans, contaminating the ground and being washed into the drainage system, T-Prime Limited shall place static plant on drip trays or bunded areas. Facilities for washing plant and equipment contaminated with concrete or other chemicals will be provided. Wash water from the facilities will be managed so as to prevent pollution of surface water and groundwater.

### **3.13. Protection Strategy for Wildlife, Trees, Watercourses and Landscape Features**

It is important to T-Prime Limited as a company to minimise the impact of their construction projects on local wildlife. Planning law may require us to undertake formal Environmental Impact Assessment (EIA) if the development is a sizeable one, as part of our Planning Permission. The Town and Country Planning (Environmental Impact Assessment) Regulations 1999 have significantly increased the number and type of developments which are likely to need formal impact assessment. Undertaking preliminary discussions with



the Planning Authority about the proposed development will provide us with the opportunity to seek an informal view on whether EIA is likely to be required.

T-Prime Limited will undertake an environmental appraisal, which properly accounts for biodiversity, as an element of all our developmental proposals, regardless of the statutory necessity to do so. Our key considerations and actions include:

- To incorporate wildlife-friendly features into the building design according to location (such as nesting platforms and boxes and niches in the roof space)
- To design our buildings around pockets and corridors of wildlife value in the site, enabling the habitats to connect to surrounding areas of environmental value, providing migratory and transit routes.
- To use materials with similar PH values so as not to adversely affect adjoining habitats by 'leaching'
- To try to source our materials locally, especially if they help to support the ecology and habitats of the region. This will also reduce our travel whilst supporting the local economy.

T-Prime Limited will conduct our activities and operations to reflect best environmental practice and implement an environmental management system to pursue sustainability, continual improvement and the prevention of pollution. In particular, we will:

- Comply with all applicable legal and other requirements
- Identify environmental aspects and prioritise action to reduce them
- Set challenging targets to reduce our environmental impacts and regularly review progress
- Raise awareness of the environment amongst our employees through training, our environmental coordinators network and communication of environmental performance.
- Report annually on our progress and performance, making this available both with the office and externally
- Undertake regular maintenance reviews to ensure that our environmental management systems remain effective.

All of our construction activities shall be completed in accordance with the requirements of the Conservation (Natural Habitats) Regulations 1994 and The Wildlife and Countryside Act 1981.

### 3.14. Purchasing

T-Prime Limited will ensure that all our wholesalers and suppliers provide us and our customers with goods and materials that have limited environmental impact. The aim of the company is to achieve this by:

- Purchasing goods, plant and materials which can be manufactured, used and disposed of in an environmentally responsible way.
- Meeting, where appropriate, the standards required by all environmental legislation.
- Specifying and purchasing of plant and items which will, in the first instance, have a long working life and can be recycled when the service life has ended.
- Specifying and purchase items which can be operated in an energy efficient manner.
- Specifying and purchasing items that are of the best quality, have replacement parts and are no part of the "throw away" culture.
- Selecting suppliers and contractors who are themselves undertaking measures to make environmental improvements.
- Purchasing equipment with due consideration for the noise, emissions and vibration it produces.
- The negotiation of favourable rates from water, gas and electrical service providers.

### 3.15. Recycling

T-Prime Limited as a company is committed to minimising all waste in its operations and works. Where waste may be produced, every effort will be made to recycle such materials. T-Prime Limited will make full use of recycling facilities provided by the Supplier, Manufacturer, Client or Local Authority.

### 3.16. Removal of Trees with Preservation Order

With certain exceptions, it is illegal to fell trees in Great Britain without prior Forestry Commission (FC) approval. All cases of suspected illegal felling are investigated and prosecution may ensue. FC and the Department of Agriculture and Rural Development (DARD) Forest Service policy is that areas felled will be replanted or naturally regenerated, except where felling is allowed for environmental improvement or to enable development authorised under planning regulations. A Tree Preservation Order (TPO) is made by the Local Planning Authority (LPA) usually a local council to protect specific trees and woodland from deliberate damage and destruction. TPO's prevent the felling, topping, lopping or uprooting of trees without permission from the planning authority. T-Prime Limited accepts that, if we should deliberately destroy a tree, or damage it in a manner likely to destroy it; we could be fined up to £20,000 if convicted in the magistrate court. We are also aware that we will normally have to plant a replacement tree if the tree was cut down or destroyed. T-Prime Limited shall seek permission from the Forestry Commission to fell any growing trees that may be present on any of our sites. We shall not begin felling until we have been issued with a licence or received other permission from the Forestry Commission. An application form will be obtained from the appropriate Forestry Commission Office. It shall be completed and submitted for approval, along with two signed copies of a map of the area showing the location of the trees that we wish to fell. It is estimated that a licence shall be issued within 10 weeks from the receipt of application. If we are unsure as to whether or not a tree is covered by a protection order we shall visit the local planning authority's offices to inspect the details of TPOs in operation within the surrounding area.

### 3.17. Site Waste Management Plan

The Environmental Waste Management Regulations 2007 apply to all construction projects in England that have started on or after 6<sup>th</sup> April 2008 and have an estimated construction value of over £300,000. The Regulation require that a Site Waste Management Plan (SWMP) is produced, initially by the Client prior to construction works commencing and then developed and regularly updated by the Principal Contractor. T-Prime Limited will use good practice to ensure compliance with the SWMP in the following areas;

- Purchasing strategies or methods of work aimed at reducing waste
- The on-site re-use or recycling of site-gained materials
- The responsible disposal of waste
- Provide relevant information to the Principal Contractor on waste types and amounts
- 

### 3.18. Storage and Use of Chemicals, Fuel/Oil and Other Construction Material

Chemicals will be stored in secure designated (bunded where necessary) storage areas and in accordance with the appropriate regulatory requirements. Refuelling of vehicles and machinery will be undertaken in accordance with a specified procedure that may include the designation of refuelling areas. Spill contingency plans will be drawn up and included in the procedures. Stockpiles of dry materials will be stored in locations that prevent contamination of surface waters. Oil shall be stored in a container which is of sufficient strength and structural

integrity to ensure that it is unlikely to burst or leak in its ordinary use. The container shall be sustained within a secondary confinement system which satisfies the following requirements:

- It will have a capacity 100% of the containers storage capacity or, if there is more than one container within the system, of not less than 100% of the largest containers storage capacity of 25% of their aggregate storage capacity, whichever is the greater.
- It will be positioned so as to minimise any risk of damage by impact so far as is reasonably practicable.
- Its base and walls shall be impermeable to water and oil
- Its base and walls shall not be penetrated by any valve, pipe or other opening which is used for draining the system
- If any fill pipe, or draw off pipe, penetrates its base or any of its walls, the junction of the pipe with the base or walls shall be adequately sealed to prevent oil escaping from the system.

### 3.19. Training

All employees will be given training in general environmental awareness, task specific procedures and methods that will be used to reduce or minimise the impact to the environment by the undertakings of the company. Consultants will assist Anatolie Teterea in identifying training needs throughout the company, preparing appropriate training programmes and delivering those programmes to Employees.

### 3.20. Water

The Employees of T-Prime Limited are aware of the importance to protect the integrity of groundwater, rivers, lakes and elements of the water system. The company recognises duties under the Groundwater Regulations 1999, Anti-Pollution Works Regulations 1999 and the Water Resources Act 1991. In particular, section 85 of the Water Resources Act 1991 which state that, no person shall cause or knowingly permit any poisonous, noxious or toxic material or solid waste to enter a 'controlled' water. 'Causing' means not only deliberately releasing any polluting matter, but also the causing the pollution accidentally by being the operator of a plant or process.

Where necessary to prevent water pollution, drain covers, self-contained water systems and other methods will be used. Detergents and solvents are to be as environmentally friendly as possible and where not possible, T-Prime Limited will ensure that the migration of substances does not have an adverse impact on the environment.

### 3.21. Waste

T-Prime Limited will use the waste management approach as outlined below:

- Reduce the amount of waste produced to a minimum
- Re-use and recycle, wherever reasonably practicable
- Recover through the use of treatments and recovery processes
- Responsible disposal of waste, including waste segregation and compaction

This will be achieved by identification of:-

- Sources/processed of losses and waste
- Quantities, quality and type of waste
- Opportunities for re-use and recycling

T-Prime Limited recognises its Duty of Care under The Environmental Protection Act 1990, the Environmental Protection (Duty of Care) Regulations 1991. Hazardous Waste Regulations (England and Wales) 2005 and other associated statutory provisions.

“Hazardous waste” will only be released to a licensed “Registered Carrier” after proof (original only) has been produced by an “authorised person” has been seen and a copy retained. All parts of the “Waste Transfer” note will be suitably completed with a copy remaining with T-Prime Limited. Records of the “Hazardous Waste” disposal are to be retained for 3 years after deposit of the waste.

Where over 200kg of “Hazardous Waste” is produced over a 12-month period on our site/premise, T-Prime Limited will register that location with the Environment Agency, annually after the initial notification. All waste will be suitably packed to ensure the safety of others during storage and carriage and have a unique consignment code consisting of letters, numbers or a symbol. This packaging must also prevent spillage, leakage, waste blowing or falling or the pilfering of contents by third parties.

### 3.22. Wood/Timber Procurement

T-Prime Limited is committed to the responsible procurement of forest products. We will never knowingly become involved in, collude with or procure timber from illegal logging operations. We will work with our supply chain to ensure where possible all forest products originate from FSC-Certified sources. Our procurement policy requires that all timber and wood derived products must have Forest Steward Council (FSC) chain of custody certification or in cases where it is not possible to source FSC-certified products; we will source from independently verifiable legal and sustainable sources.