

ISO14001:2015

**Safetykleen
Environment Management System.
Environment Manual.**



Environment Management Manual Distribution List.

A controlled, electronic copy of the Environmental Policy, Processes and the full EMS are available on SharePoint all SK employees have access to these files.

2. Amendment Record.

This Environmental Management Manual acts as the central reference index and guide to all of the environmental aspects, processes and improvements of the company's business. It therefore requires regular revision.

All amendments to the controlled Environmental Management Manual are listed in the amendment record table below. The certification body is notified of all changes at each external audit and a single copy of each obsolete issue is retained in the company's documentation archive.

ISSUE	AMENDMENTS	DATE	APPROVED
1	First draft	01/2000	Quality Assurance Manager and Environmental Manager.
2	General Revision	04/2000	Quality Assurance Manager and Environmental Manager.
3	Full Review	07/2003	Quality Assurance Manager and Environmental Manager.
4	Full Review (ISO 9001:2008 and ISO14001:2004)	09/2006	Quality Assurance Manager and Environmental Manager.
5	Full Review	03/2009	Compliance Manager.
5	Full Revision to reflect current Operations	05/2012	Compliance Manager.
5	Partial review	02/2013	Compliance Manager.
6?	Full review to reflect revised operations	04/2014	Health, Safety and Quality Manager.
7	Full review (ISO 14001:2015)	02/2018	Environment Manager & Compliance Officer

Section 4 - Context of the Organisation.

Safetykleen is an organisation committed to providing stakeholders with environmentally sound products and services, systems of work and waste disposal practices to introduce the best environmental techniques to reduce the environmental impact in the communities in which we operate.

4.1 Understanding the organisation and its context.



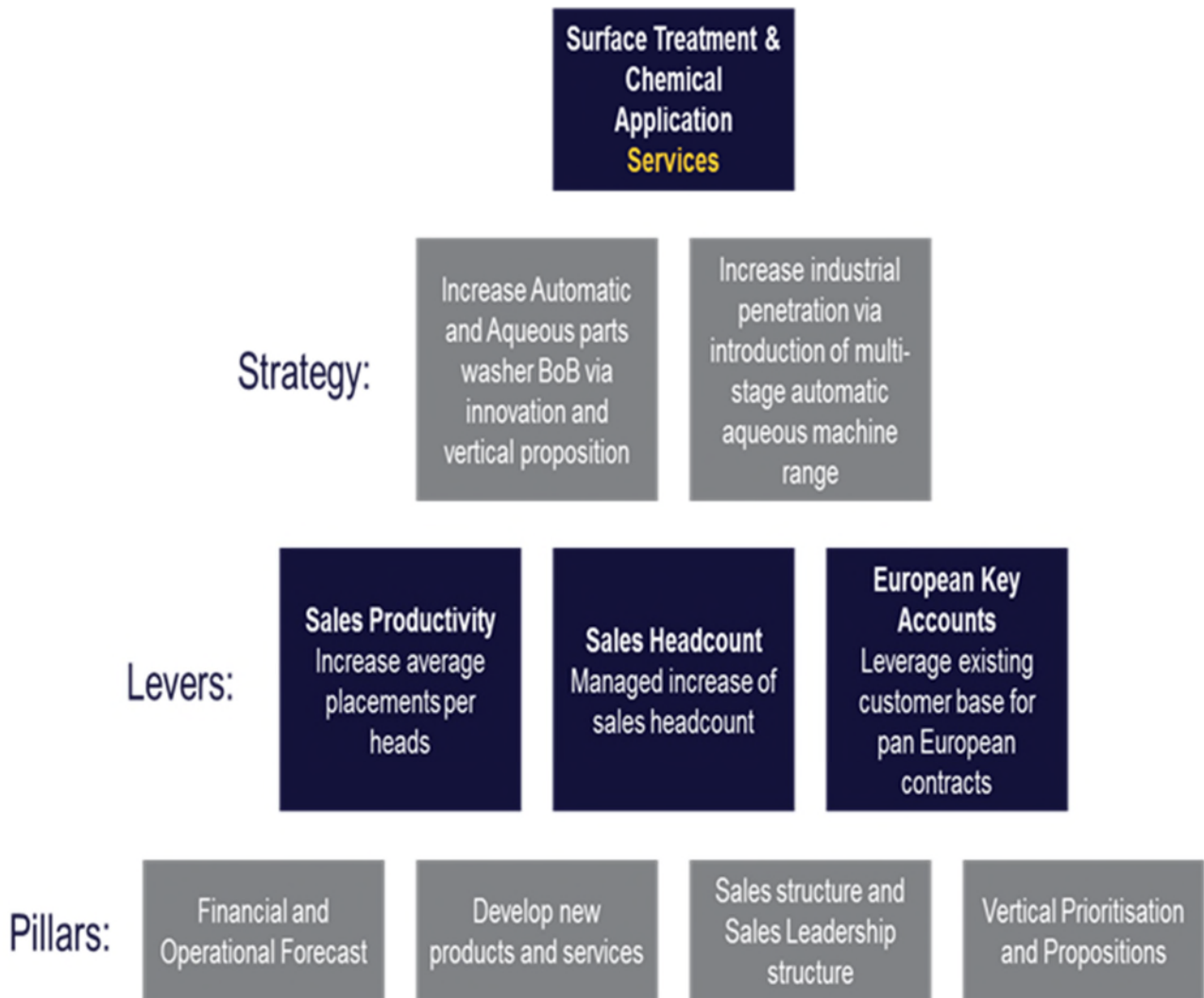
4.1.1 Internal issues and external issues.

External Issues	Information	Monitor	Review
Market	Market Information gathered from variety of independent sources. Competitor developments will be obtained from Customer Base via CCR or informal communications. General Market data will be achieved by reviewing press. Legislation and regulation changes will be obtained via monthly, weekly communication from 'New Ground' 'legislation.go.uk,	Informal review structure. Legislative changes/ update via HSEQ. Marketing Team for all other market data.	Monthly review during PRM.
Social	Safetykleen has formulated a Social Responsibility Policy	Informal via HR. Customer Care Reviews or direct customer Communication	PRM.
Financial	Safetykleen financial team will liaise directly with our owners (APAX) who will inform the team on any external issue they are aware of and propose action plan or strategy.	Profitability monitored by Finance team. Ancillary spend controlled by Purchasing department.	Monthly review during PRM.
Environmental	Direct communications with relevant industry Bodies and Regulators	Informal review structure. Legislative changes/ update via HSEQ.	Monthly review during PRM.
Competition	Awareness of Competitor presence.	Feedback from Customer base.	PRM but no formalised process.
Technology	R&D and Marketing team closely liaise with market technological updates and emerging technologies. Review potential to integrate into Safetykleen business models and strategic directions.	Continuous	PRM but no formalised process.
Economy	Media driven. Company has conducted initial response and review of BREXIT	Continuous	Continuous
Legal	Legislation and regulation changes will be obtained via monthly, weekly communication from 'New Ground' 'legislation.go.uk,	Continuous	Continuous

Internal Issues.	Information	Monitor	Review
Company Strategic Direction	Long term Strategy. Migration from Solvent to aqueous chemistries. Development and expansion of collectable services. Branch network expansion. Production of 'Not' Waste options for kerosene.	Strategy fluid to future market and legislation changes. Finance monitored	Continuous
Company Values, Beliefs & Culture	Values longstanding and ingrained. Strive and focused as market leader. Driven to enhance customer satisfaction.	Continuous	Continuous
Knowledge and Competence	Employee roles have detailed training matrix containing mandatory core topics. Competence informally reviewed via manager coaching.	Training audited during internal auditing schedules.	Audit based review and during PRM.
Performance and Monitoring	Internal and Customer/supplier Audit Outcomes	Continuous	Review during PRM.
Products and Services.	Marketing and customer services driven. Product and services information available on company website. Product brochures from machine solutions and chemistry supplied. Generic information available on customer information packs.	Continuous by Marketing and Customer services	Continuous.
Resources and Systems	Resources and system requirements, issues and opportunities for improvements will be communicated by the relevant process holder to the senior management team during monthly PRM.	Continuous.	Review during PRM.
Targeted Communications.	Communications to customers via Customer Services and BSU. Provision of Company literature via Website and Customer information packs. Internal communication via generic company email address. Department alerts and 'News Flash'	Continuous.	Continuous.

Safetykleen's Collectable services and partswash machine servicing business models

Safetykleen is the market leader in the provision of parts washing, spraygun cleaning and collectable services to the industrial and automotive sectors and operates under a bespoke business model.



The foundation of the service is the 'Closed Loop System'. Dependant on application, needs and concerns, the customer is provided with a machine employing aqueous or hydrocarbon based solvents, and a service comprising unit maintenance, supply of fresh cleaning fluid and the collection of waste fluid arising. This is either recycled or disposed of responsibly using only reputable, registered, licensed and audited operators.

Safetykleen also provide a complete national service to the customer; providing advice, training, waste identification, carriage and onward disposal for the small and medium sized producer. This disposal will follow the accepted 'Waste Hierarchy' and 'Best Practice' where practicable, in addition to full compliance with applicable current legislation and regulations. A key objective of the company is to reduce dependence on fossil fuels by the use of recycled solvent, aqueous based fluids and the sustainable disposal of waste materials. This strategy has wide industry acceptance and not only helps to reduce our impact on the environment, but that of our customers. This is a key differential in our company's service to the customer.

Safetykleen is committed to the continual improvement of its environmental performance, including the prevention of pollution, as defined in the company's register of environmental aspects, and intends to achieve this by setting clear environmental objectives and regularly monitoring progress against them. Our philosophy relating to research, development, design and operation of products, plant and equipment is to consider the environmental impacts of these processes and, where practicable, work to improve our environmental control measures and minimise these impacts.

4.2 Understanding the Needs and Expectations of Interested Parties.

Interested Party.	Requirements and needs of interested party relevant to Environmental Management System.	Interested Party potential impact on EMS.	Env compliance Obligation	Monitor & Review
Investor owner Partners and Shareholders.	Minimal direct interaction with the Environmental Management System. Ownership of company and stock within.	Low	No	Achieved by reviewing Company Non-conformances, internal/external audits reports. Reviewed at PRM's
Safetykleen Senior Management Team.	Required to develop and maintain Environmental Management System in line with Company strategic direction, values culture legislative requirements. Ensure that Environmental Management System can effectively implement changes to further enhance EMS. Review and evaluate EMS intended outcomes.	Very High	Yes	Achieved by setting and reviewing employee training and continued competence. Analysis of Customer Care reviews and Complaints. Feedback from Suppliers to evaluate EMS performance.
Safetykleen Employees.	Requirement to adhere to all aspects of EMS process, procedures and IT tracking systems. Employees need to continually evaluate effectiveness of EMS. Required to understand company's environment aspects and awareness.	Very High	Yes	Achieved by Induction training, continual competence training or coaching where necessary. PRM to ensure overall effectiveness. Internal auditing to ensure adherence to EMS
Ancillary & Consumable Suppliers.	Minimal direct interaction with the Environmental Management System.	Very Low	No	Supplier evaluation and Desktop auditing. Suppliers performance reviewed at PRM meetings with senior management team.
Governmental and Regulatory Bodies.	Regulators can visit site and issue enforcement action. The company is obliged to be legally compliant to statutory & other requirements (Env, H&S, and Quality etc). The Branch permits have consents and caveats that require implementation of monitoring schedules.	Very High	Yes	Direct communications and feedback from regulatory bodies. Information cascaded to senior Management Team during next PRM.
Existing & Prospective Customers and End Users	Provide detailed information of EMS during tender process. Customer requirements and specification obtained and adhered to throughout transaction. Requires adherence to Waste Hierarchy and Waste Framework Directive. Provide legal waste documentation and detailed waste recovery/disposal methodology. Consider Cradle to grave aspects.	Very High	Yes	Achieved by Direct Customer Communication via relevant branch level function. Trending and evaluation of Customer Care reviews. Review of Internal audit results
Contractors and 3rd Party Companies	Provide detailed information of EMS during tender process. Customer requirements and specification obtained and adhered to throughout transaction. Requires adherence to Waste Hierarchy and Waste Framework Directive. Provide legal waste documentation and detailed waste recovery/disposal methodology. Consider Cradle to grave aspects.	Medium.	Yes	Achieved by Direct Customer Communication via relevant branch level function. Trending and evaluation of Customer Care reviews. Review of Duty of Care audit results

4.3. The Scope of Safetykleen Environmental Management Systems.

SafetyKleen has operated Environmental Management System in accordance with ISO 14001 management standards systems since 2000. The scope of the accreditation remains unchanged as follows:-

1. The supply, waste removal and replenishment of recycled solvents, which are used in machines provided for the degreasing and cleaning of component parts and equipment.
2. The design, construction and supply of machines and related equipment intended to be used for automated or manual cleaning processes using liquids.
3. The supply of ancillary products (such as absorbent socks) for liquid spill clean-up and subsequent collection and disposal of associated wastes.
4. The collection of drummed and bulk wastes, including oils, for onward transport to third parties for processing or disposal.

4.4 Environmental Management System.

This document serves the following purposes:

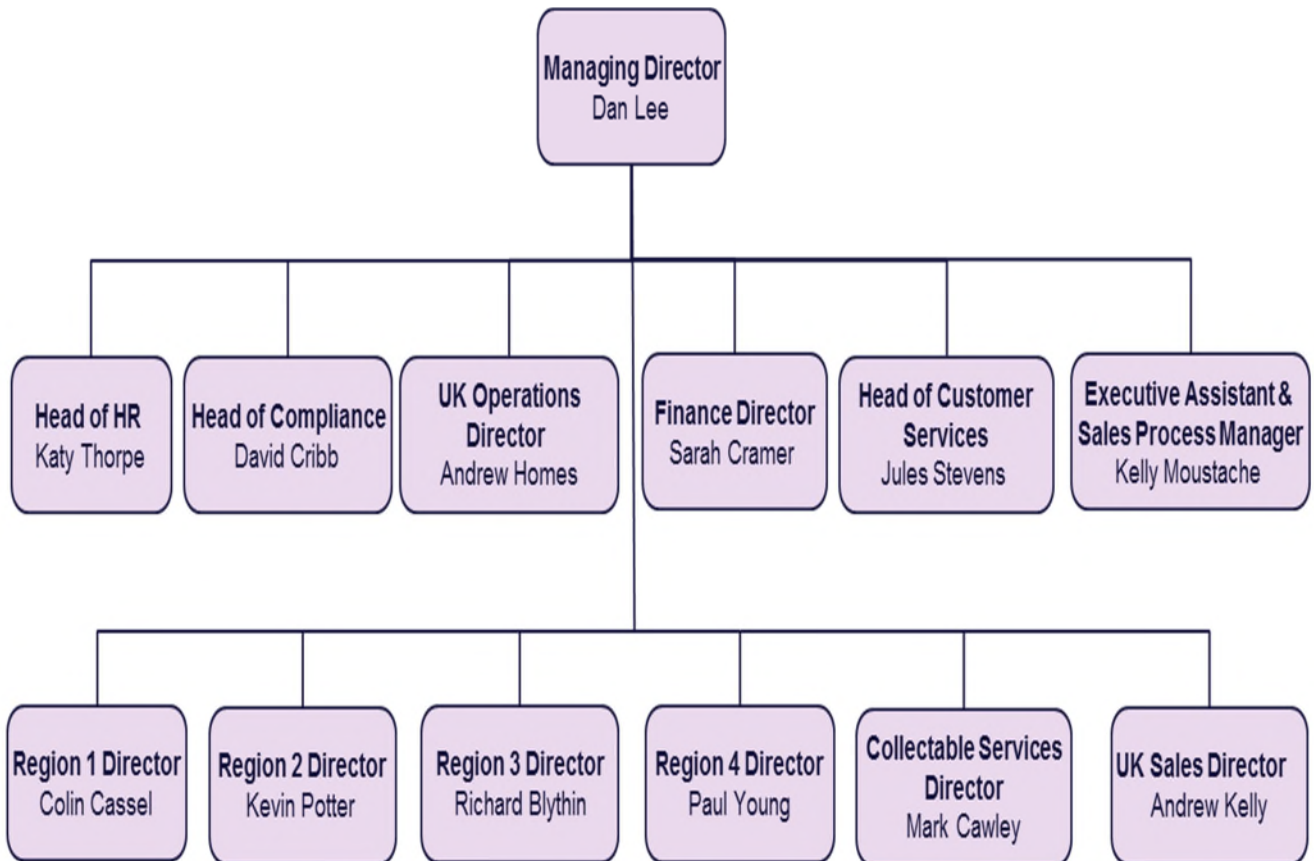
- It describes the Environmental Management System operated at all the Company's UK and Ireland Operating Centres.
- It serves as a cross-reference between the requirements of ISO 14001/2015 and the environmental documentation in use by the company, i.e. register of environmental aspects, register of regulations, processes and work instructions.
- It serves as a link and cross-reference to the Company's Quality Management System, certified to ISO 9001, which co-ordinates both quality control and environmental control processes within a single, integrated processes section in the electronic Sharepoint Database.
- It references processes and Work Instructions dealing with environmental matters that are integrated into the ISO 9001 quality system. The complete list of environmental control processes is to be found on the SharePoint database.
- These processes, and their accompanying work instructions, support the Environmental Management Manual and the registers by providing a description of the work practices required to maintain compliance with ISO 14001/2015.
- The Register of Environmental Aspects records all significant environmental impacts arising from the company's activities and provides the basis for setting Objectives and continuous improvement Programmes.
- The legal register records all applicable legislation and regulations that the company is required to comply with.

Section 5 – Leadership.

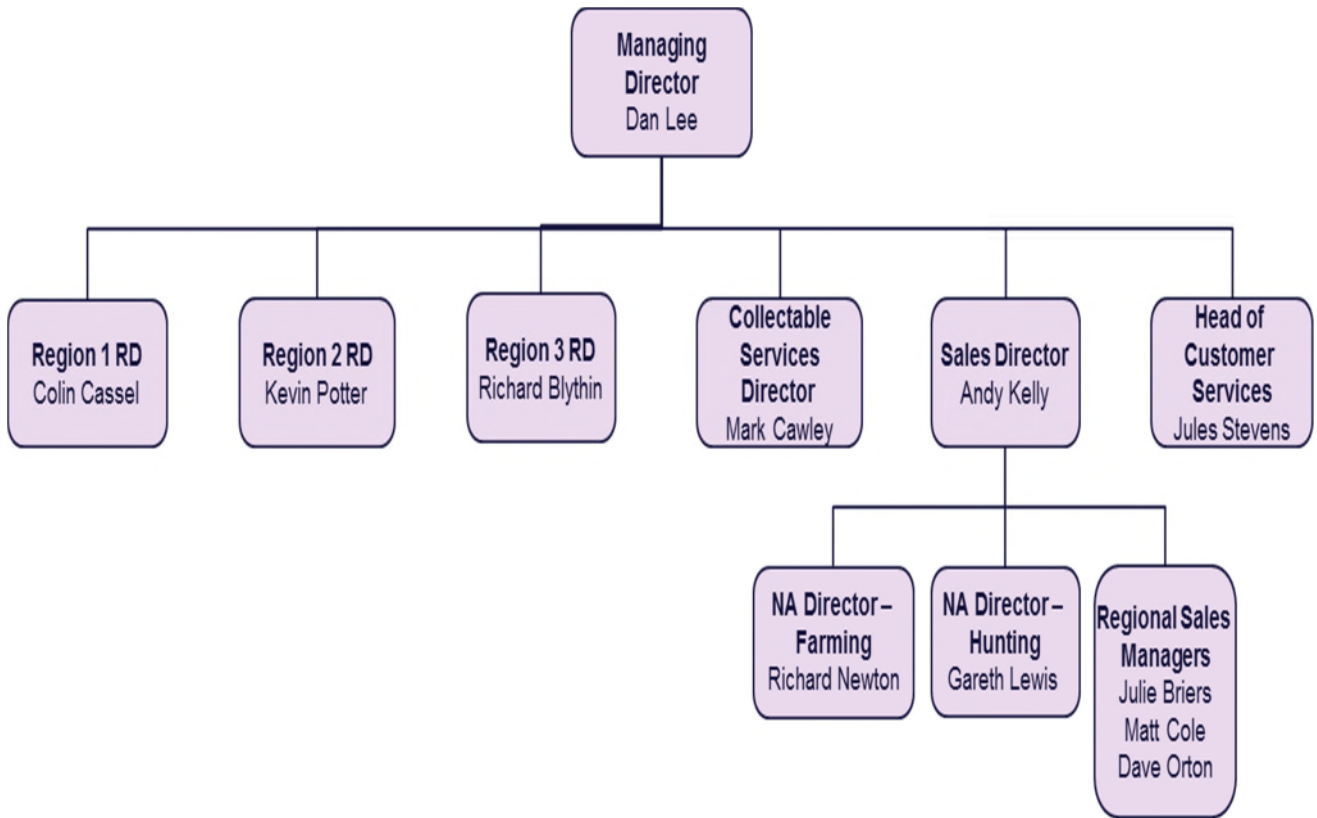
5.1 Leadership and commitment.

The structure of Safetykleen ensures there is adequate resource to administer the ISO14001/2015 Environmental Management System and all other duties pertinent to its legislative obligations. These resources form a dedicated “Compliance” department with roles inclusive of senior management and subject specialists.

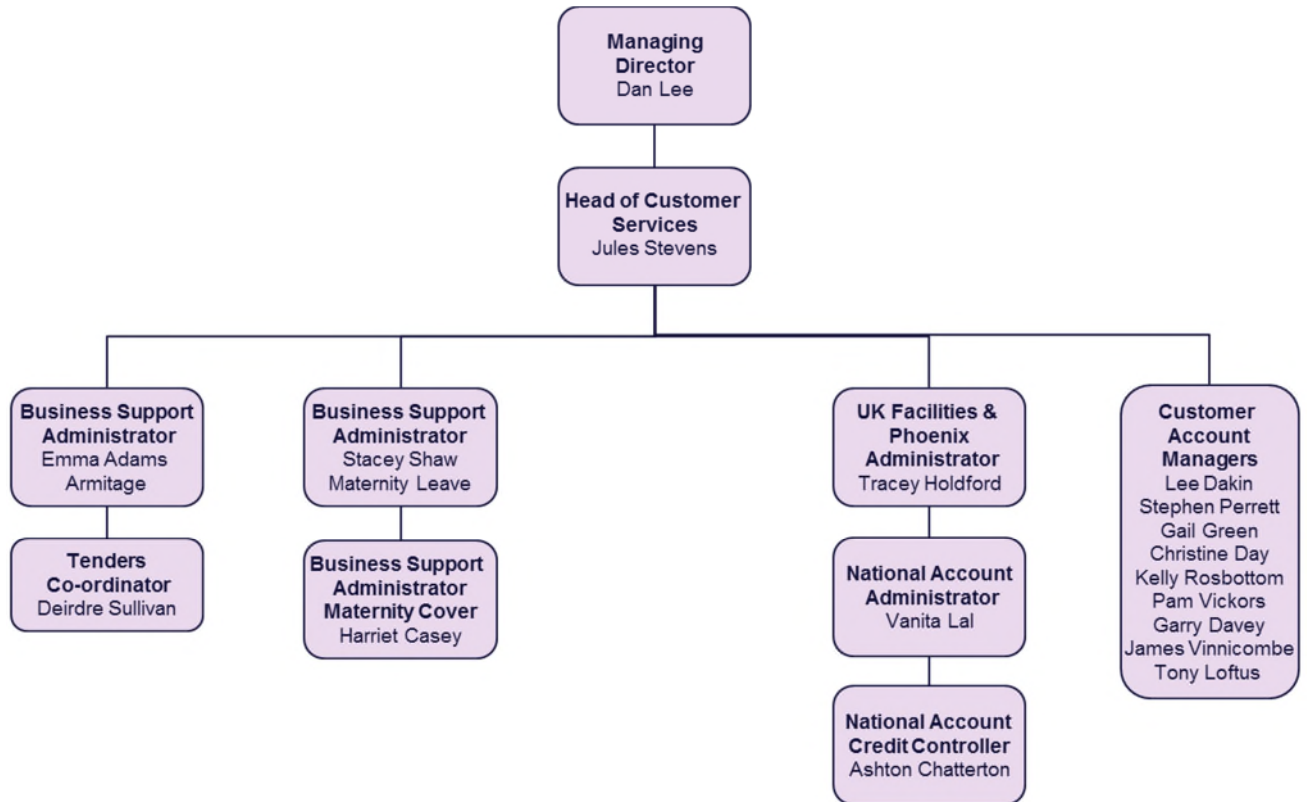
Senior Management Team



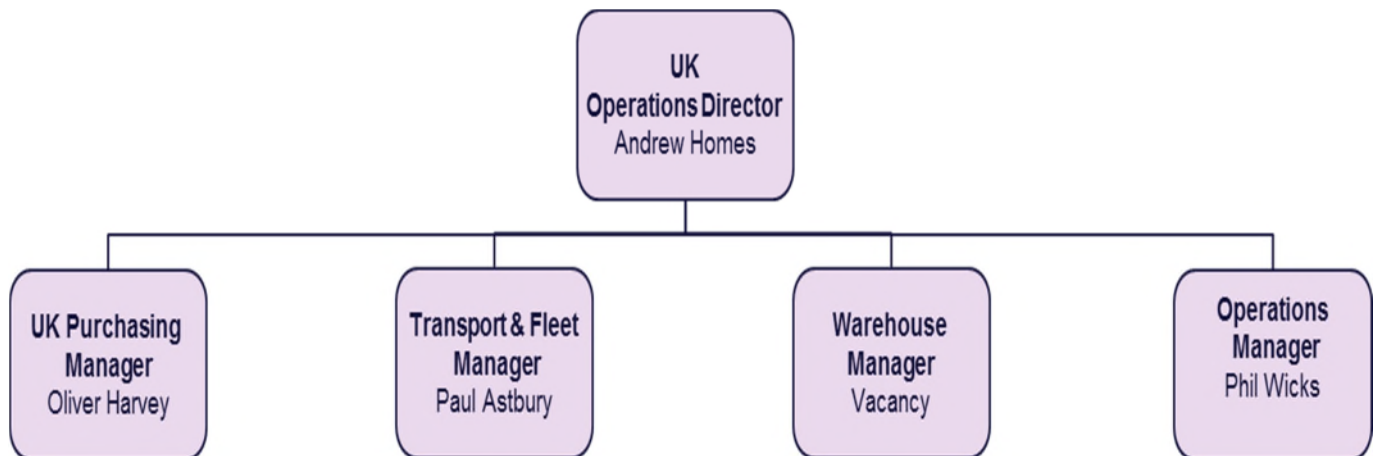
Safetykleen Sales and Services.



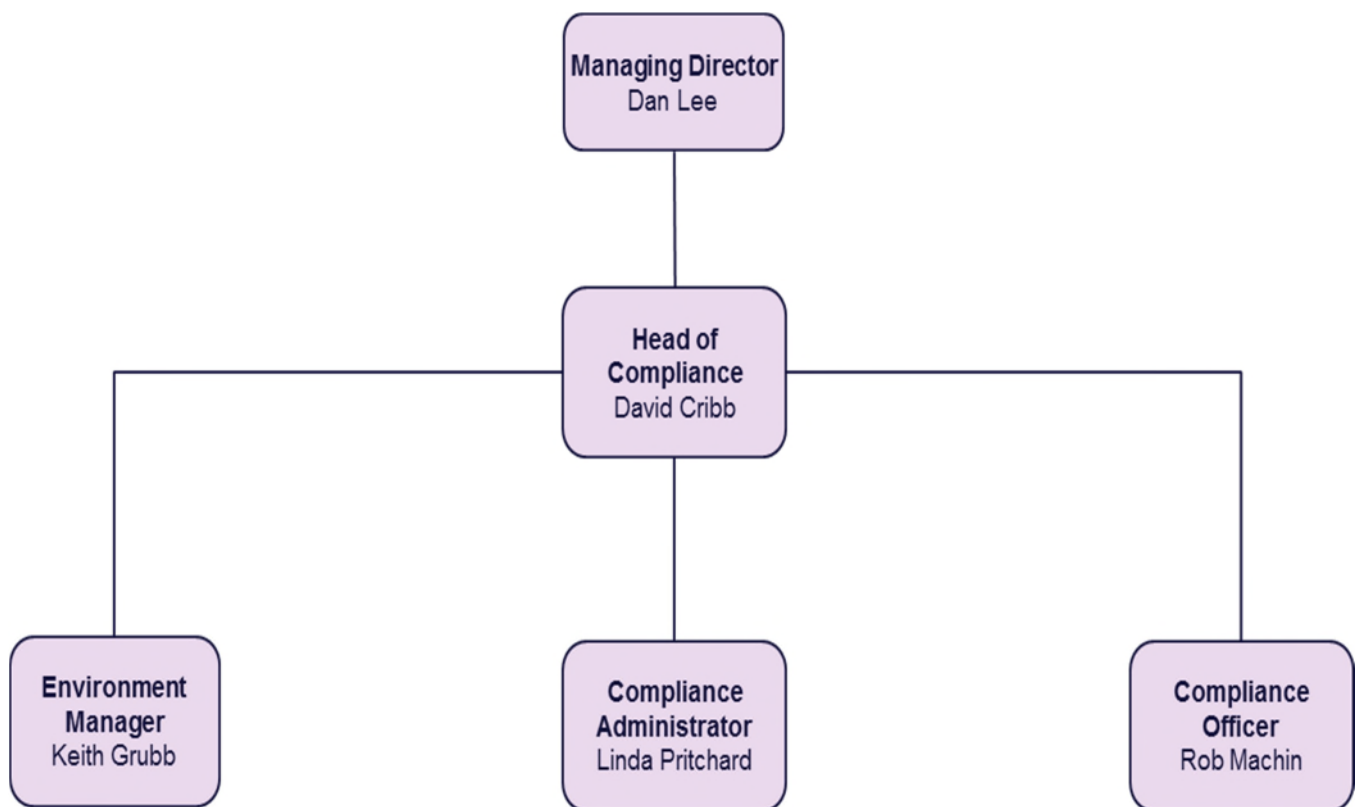
Safetykleen Customer Services.



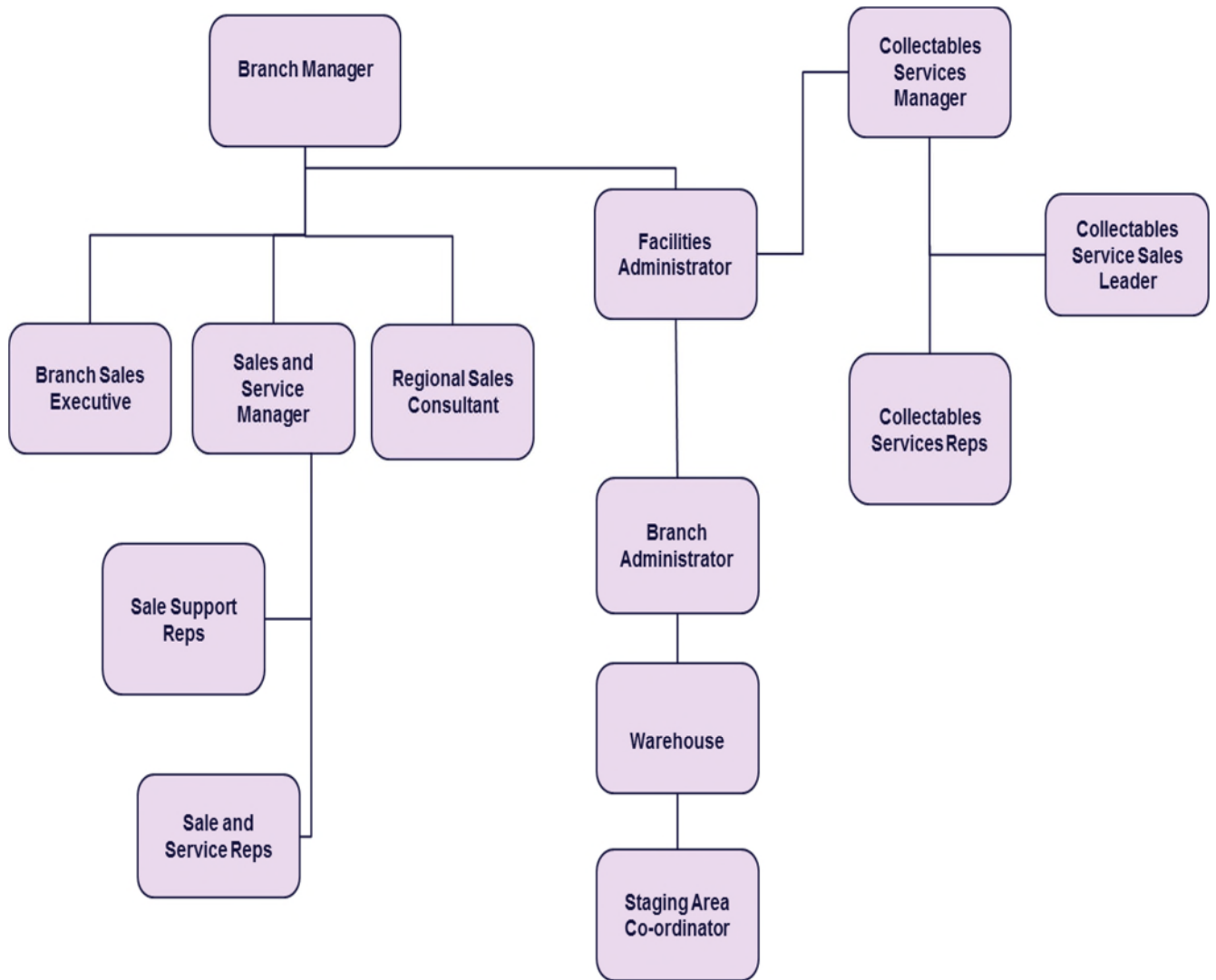
UK Operations Team.



UK Compliance Team.



UK Branch Team.



5.2 Environmental Policy.



ENVIRONMENTAL POLICY 2018

General Statement

Safetykleen is an organisation committed to providing stakeholders with environmentally sound products and services, systems of work and waste disposal practices to introduce the best environmental techniques to reduce the environmental impact in the communities in which we operate.

Safetykleen is the market leader in the provision of parts washing, spraygun cleaning and collectable services to the industrial and automotive sectors. The foundation of the service is the 'Closed Loop System.' Dependant on application, needs and concerns, the customer is provided with a machine employing aqueous or hydrocarbon based solvents, and a service comprising unit maintenance, supply of fresh cleaning fluid and the collection of fluids arising. This is reused, recycled or disposed of responsibly using only reputable, registered, licensed and audited operators.

We also provide a complete national service to the customer; providing advice, training, waste identification, carriage and onward disposal. This disposal will follow the accepted 'Waste Hierarchy' and 'Best Practice' where practicable, in addition to full compliance with applicable current legislation and regulations.

Objectives

A key objective of the company is to reduce dependence on fossil fuels and volatile organic compounds by the use of recycled solvent, aqueous based fluids and the sustainable disposal of waste materials. This strategy has wide industry acceptance and not only helps to reduce our impact on the environment, but that of our customers. This is a key differential in our company's service to the customer.

Safetykleen is committed to the continual improvement of its environmental performance, including the prevention of pollution, and generation of wastes as defined in the company's register of environmental aspects, and intends to achieve this by setting clear environmental objectives and regularly monitoring progress against them.

Philosophy

Our philosophy relating to research, development, design and operation of products, plant and equipment is to consider the environmental impacts of these processes and, where practicable, work to improve our environmental control measures and minimise these impacts.

Safetykleen will:

1. Manage its activities internally, and in relation to our customer services in ways that conserve and protect the environment in a socially responsible manner. This is achieved by operating a documented management system that fully complies with the requirements of ISO9001 and ISO14001, as well as all applicable and pending Health & Safety and other legislation.
2. Promote environmental awareness throughout our employees, suppliers and customers and, where relevant, make them aware of the potential environmental impacts of their activities via suitable training and the provision of information and advice.
3. Carry out regular audits of identified aspects of the company's business to ensure compliance with this policy and associated procedures.
4. Ensure that this policy is understood, implemented and maintained at all levels throughout the company.
5. Provide public access, on request, to information on the company's environmental performance.

Safetykleen's ISO14001:2015 registration is to the following scope:

1. The supply, removal and replenishment of recycled solvents, which are used in machines provided for the degreasing and cleaning of component parts and equipment.
2. The design, construction and supply of machines and related equipment intended to be used for automated or manual cleaning processes using liquids.
3. The supply of ancillary products for liquid spill cleanup and subsequent collection and disposal of associated wastes.
4. Collection of drummed and bulk wastes, including oils, for onward transport to third parties for processing or disposal

Signed

Date:

Dan Lee
Managing Director

5.3 Organisational roles, Responsibilities and Authorities.

Environmental Management System Responsibilities	Persons Responsible
Establish overall direction (intended outcomes) and continual improvement	MD, Head of Compliance
Develop environmental policy	MD, Head of Compliance
Develop environmental objectives and processes including integration into EMS	MD, Head of Compliance, Regional Directors
Consider environmental aspects during the design and strategy process	Head of Compliance, Compliance Department
Monitor overall environmental management system performance	Environmental Manager
Assure fulfilment of compliance obligations	All Managers
Promote continual improvement	All Managers
Identify customers' expectations	Sales marketing staff
Identify requirements for suppliers and criteria for procurement.	Purchasing team
Develop and maintain accounting processes.	Finance Director, Finance team
Conform to Environmental Management systems requirements	All persons working under the Safetykleen umbrella.
Review the operations of the Environmental Management system	Senior Management Team

Refer to Quality Process QP01 – Quality Management Systems Documentation.

Refer to Quality Process QP02 – Management Responsibility and Review.

Section 6 – Planning.

6.1 Actions to address risks and opportunities.

Safetykleen address risk and opportunity through a Risk/Opportunity Matrix described in Work instruction 6.1.1

The risks and opportunities for Safetykleen are derived using the New Ground Legislation Update Service (Described in 6.1.1A) and transposed into the Risk/Opportunity Matrix

The planning of Environmental Management Systems, we have considered outputs from section 4.1 understanding the organisation and its context and section 4.2 the needs and expectations of interested parties.

The following Tables document the risk and opportunities that Safetykleen have determined are relevant to the context of the organisation, the needs and expectation of interested parties and the strategic direction of the Company.

6.1.1 Risks

Issue	Current Position	Risk Identified	I	P	Risk score	Actions to reduce risk or Opportunity Identified?	Added to opp map?
Process 1. Business planning and Work Planning	Overall review of the EMS/QMS effectiveness, setting of objectives and review of trends and indicators. Ensure sufficient resources. Planned materials & resources in order to meet customer requirements - delivery/installation	Inadequate planning, leading ineffective system, non-fulfilment of compliance obligations, objectives and measures not set, risk and opportunities not realised, review minutes not documented.	3	2	6	Conduct Periodic strategic meetings to evaluate Effectiveness of QMS/EMS and ensure all identified Risk and Opportunities are actioned	yes
Process 2. Customer Enquiries & quotations	Customer order requirements reviewed and processed. Statutory regulatory requirements understood by all relevant process holders.	Contract review not completed correctly leading to non-fulfilment of customer requirements. Contract review not confirmed. Contract review stamp missing. Possible non-compliance to statutory/regulatory requirements	3	1	3	ALARP (Acceptable Risk)	No
Process 3. One kerosene re-distillation site	All Kerosene recovered by contractual agreement with Tradebe. No other Supplier engaged.	SK unable to conduct contractual solvent machine services. Unable to minimise increases in costs. Increased customer dissatisfaction. Loss of custom and reputation. Increase presence of competitors	3	2	6	Source alternative solvent recyclers or suppliers. Further development of aqueous cleaning products to replace solvent products	yes
Process 4. Failure to Supply or Supply out of spec kerosene and thinner products.	Tradebe communicate inbound crude Kerosene NCR's and reports on outbound bulk kerosene. Contractual agreements contains detailed specification	SK unable to conduct contractual solvent machine services or failed specification causing damage to customer's property. Increased customer dissatisfaction. Loss of custom and reputation.	3	2	6	Source alternative solvent recyclers or suppliers. Further development of aqueous cleaning products to replace solvent products	yes
Process 5. Component or ancillary suppliers' failure.	Production Administrator Aaron Thompson liaises with suppliers on a weekly basis. DC hold working stock levels. Minimum stock levels based on AX/CRM inventory system. Visual Kanban system in place on shop floor as a backup trigger function. Purchasing Department liaise with ancillary suppliers regularly any issue effectively communicated.	SK Machine Refurbishment prevented or non-conforming machines release out to customers. Broken machine backloging branch operations. Service and repair callouts prevented. Customer waste collections impacted. Waste collections frequency reduced. Increased surveillance by regulatory bodies (EA). Loss of custom and loss of reputation. Increase in competitor presence.	2	1	2	ALARP (Acceptable Risk)	No
Process 6. Machine Refurbishment process failure.	SK hold sufficient machine stock at branch network and DC to service customers for short term. Long term broker out refurbishment to external contractor.	SK Machine Refurbishment prevented or non-conforming machines release out to customers. Broken machine backloging branch operations. Service and repair callouts prevented. Increased customer dissatisfaction. Loss of custom and reputation. Increases presence of competitors.	3	1	3		No
Process 7. Loss of a Branch.	SK hold spare capacity machines and consumables throughout branch network. Team members from DC refurb team to service customers as short term stop gap. Long term Facilities Management and Top Management to obtain suitable industrial unit to develop a replacement branch	SK unable to conduct contractual machine services in geographic location. Customer waste collections impacted. Waste collections frequency reduced. Increased Surveillance by regulatory bodies (EA). Loss of custom and loss of reputation. Increase in competitor presence.	2	1	2	ALARP (Acceptable Risk)	No

Process 8. 3 rd Party Disposal site failure	SK conducts rigorous annual Duty Care desktop reviews for all 3rd party disposal sites. Significant 3rd party disposal sites will have annual duty of care site audit. All suppliers are on SK approved suppliers list. Few Suppliers take most of SK waste throughputs.	Increases surveillance and litigation from governmental regulatory bodies (EA). Impact several branches conducting Waste collection. Breach of Waste Service agreements. Reduction in customer waste collection frequency. Reduction in branch waste throughputs and storage levels. Negative media image. Increase customer dissatisfaction leading to loss of custom. Increase in competitor presence.	3	2	6	Develop and Expand 3rd Party Disposal sites portfolio	yes
Process 9. Purchasing	Raising of purchase order on AX/CRM system. Inventory function within AX/CRM manages and highlights stock levels.	Purchase order information incorrectly specified, leading to goods purchased that do not meet specification (including product quality, & environmental reqmts). Payment to suppliers been withheld leading to Backlogging of future supplies. Our accounts placed on STOP and been blacklisted by supplier.	3	1	3		No
Process 10. Goods Receipt	Goods received within Warehouse function of DC or Branch, Warehouse completed verified and booked into AX/CRM Inventory. Goods materials allocated to correct storage location.	Late delivery, wrong material sent, incorrect quantity, received damaged or incomplete. Received poor quality..	3	1	3		No
Process 11. Machine Installation and servicing	SK Machine installed as agreed at customer quotation and in line to customer requirement.	Installation not completed in line with drawing/installation pack. Non-competent Employees or contractors. Poor feedback on installation issues. Installation not completed in a timely manner. Material availability issues. Installation report not signed off by installer/customer representative. Increased Customer dissatisfaction, loss of Custom, increase in competitors	3	1	3		No
Process 12. Asset Maintenance and Calibration	Reduced breakdowns and maximised manufacturing efficiency, Equipment adequately identified, calibrated and traceable back to national/international standards	Unscheduled downtime, non-availability of key spares, inadequate resources allocated. Use of non-competent employees and/or Contractors. Equipment loss, loss of identification, equipment not recalled in line with schedule. Insufficient resource to complete schedule. Stored and handled incorrectly, leading to damage or uncontrolled results.	3	1	3		No
Process 13. Training	Competent personnel across all areas. Qualifications on file. Biannual Training for key areas of Compliance, H&S, & Environmental. All Service Employees ride out with Manager to obtain further coaching and evaluation in competence. HR software current and up to date	Use of non-competent resource. Untrained persons allocated to processes/equipment leading to non-compliant product/environmental incident. Increased Customer Dissatisfaction. Loss of Customer. Negative Media Image. Increased Competitor presence.	3	2	6	Ensure that strategic career succession is available and applied to all engaged employees.	yes
Environmental 1. Releases to water	Few SK Branches have Trade Effluent Discard consents. Internal monitoring results to comply with discharge conditions of local water authority conditions. Yearly External sample analysis as part of permitting requirements.	Uncontrolled release to foul or surface water. Breach of consent to discharge conditions. Inadequate internal/external monitoring. Loss of Branch Permit. Increase OPRA scoring, increases subsistent Fees. Increased EA surveillance. Negative Media Image. Loss of Custom.	2	2	4		No
Environmental 2. Storage of chemicals	Periodic rehearsal of emergency procedures, mitigation equipment in place, trained authorised personnel.	Lack of emergency preparedness could mean that an actual emergency situation is not managed correctly.	2	1	2	ALARP (Acceptable Risk)	No

Environmental 3. Branch Waste and Customer Waste control	Waste managed to meet legal requirements and duty of care	Eventual lack of suitable landfill sites. Sustainable routes for waste. Use of non-recyclable raw materials.	2	1	2	ALARP (Acceptable Risk)	No
Environmental 4. Electricity & gas usage/waste	Monitoring of utility use, ESOS baseline data gathering and compliance. Minimise energy use.	Use of natural resources. Interruption of supply. Global warming. Non-adoption of energy efficient equipment as it becomes available.	2	1	2	ALARP (Acceptable Risk)	No
Environmental 5. Compliance obligation	Legal obligations met to avoid prosecution. Permits and consents reviewed, compliance obligation review completed on a planned basis	Breach of permit or consent conditions. Non-compliance to pertinent regulatory and statutory requirements. Potential breaches leading to enforcement action by regulators, leading to prosecution/fines	3	1	3		No
Environmental 6. Potential to pollute / protection of the environment	Permit and consent conditions met, pollution prevention controls and mitigation equipment in place. Trained resource to ensure that the company does not pollute. Monitoring and measuring in place.	Uncontrolled release, pollution of land, water or air. Potential enforcement action by regulators if the company is a polluter.	3	1	3		No
Environmental 7. Visual impact	Tidy site. Not to cause statutory nuisance outside site boundary. A Documented requirement of our Branch Permit conditions. Scheduled visits by internal Maintenance team	Unightly premises leading to statutory nuisance, with potential enforcement action by local authority or EA.	1	1	1	ALARP (Acceptable Risk)	No
Environmental 8. Change in Legislation	legislation is currently monitored via New ground and implemented through HSEQ department	Site closure, enforcement action, prosecution, loss of permit, reputational damage. Failure to replace methodologies. Failure to develop new services or goods.	2	1	2	ALARP (Acceptable Risk)	No
Environmental 9. Failure to submit quarterly returns, Consignee returns and packaging returns.	Quarterly returns are produced and submitted manually. Current software system produces consignee returns on a monthly basis. Safetykleen have employed the services of Paperpak to ensure the packaging returns obligations are met.	Enforcement Action. Increased subsistence fees, Increased OPRA Scorings. Suspension/removal of Permits. Increased surveillance. Loss of Customers, Increased Customer dissatisfaction.	2	1	2	ALARP (Acceptable Risk)	No
Environmental 10. Permit conditions, WAMITAB Cover and DOC Requirements.	Safetykleen employ Facility Administrators to ensure all permit conditions are adhered to. All Safetykleen sites have a WAMITAB holder present to cover permit stipulated hours.	Enforcement Action for Safetykleen and customer base. Increased subsistence fees, Increased OPRA Scorings. Suspension/removal of Permits. Increased surveillance. Loss of Customers, Increased Customer dissatisfaction.	3	2	6	Weekly Wamitab Cover rather than Daily. Review Wamitab requirement.	yes
Environmental 11. Fire	All Safetykleen sites have been risk assessed and all necessary firefighting equipment available. HSEQ Team to review and evaluate feasibility of Integrated Fire Prevention Plans	Fugitive emissions, Fire water containment.	3	2	6	Implement FPP to all SK Branch Network	yes
Environmental 12. flood	Safetykleen have produced flood risk assessments for sites that may be effected.	Fugitive emissions.	2	1	2	ALARP (Acceptable Risk)	No
Environmental 13. Spill	All Safetykleen staff members are bi-annually trained on spill response.	Fugitive emissions and risk of injury to staff.	3	1	3		No

Environmental 14. Waste Pre-acceptance and Branch Expansion.	Safetykleen Pre-acceptance of Waste based upon WM3 regulations. EA arguing that S5.06 applies to our Business model	Being pressured by the EA to comply with a guidance document that does not fit with SK current methodology. Increased communication with EA hazardous waste division. Increased financial burden, reduced customer waste collection frequencies, increased customer dissatisfaction and loss of customers. Development of SK bespoke environmental permits.	3	3	9	Development of SK Permit Model. Future Branch Developments assured. Consistent waste Classification, routing and treatment methods applied.	yes
Environmental 15. Definition of waste.	Safetykleen is actively reviewing all waste streams currently accepted into branch network. We are liaising with 3rd party disposal sites to enhance engagement and best practices.	The EA are now openly accepting that SK does not conduct the same functions as other waste business models within the industry.	3	3	9	'Dirty' Kerosene based products not defined as waste on receipt at SK Branch Network. Due to re-use. Customer achieves Highest level on WFD since he has prevented the production of waste most desired.	yes
Internal 1. Company Strategic direction	Senior management set strategic direction through business plans, vision mission and policy	Strategic planning not adequately set. Insufficient resource set to achieve strategy	2	1	2	ALARP (Acceptable Risk)	No
Internal 2. Company Values, Beliefs & Culture	Long established values and beliefs, which are cast in policies and business planning	Non-commitment, changes not managed, policies not maintained and adhered to.	2	1	2	ALARP (Acceptable Risk)	No
Internal 3. Resources and Systems	Workforce retention, workforce is loyal to the company. Employment of local people. Systems to comply with company requirements, relevant ISO standards etc. To be available on the network and hard copy where required. Audited and reviewed for effectiveness	Lack of personal development may lead to employees leaving. Failure to maintain and audit systems, failure to manage changes, failure to resource systems adequately	2	2	4		No
Internal 4. Technology	Used and updated where required to ensure effective business management and production	Insufficient resources, non-adoption of new technology	2	2	4		No
Internal 5. Knowledge and Competence.	SK holds documentation of all its quality based procedures and processes on sharepoint. Dedicated drive from Top Management to 'grow' from within and implement career progression strategies. Instances of Internal promotions or progression communicated to business to ensure buy in	Loss of knowledge of SK products and services leading to increased products/services failures. Increased customer dissatisfaction and loss of custom.	2	2	4	Develop Training Matrix for Role specific functions. Competency enhanced by regular reviews.	yes
Internal 6. Performance & monitoring	Range of business measures , in order to ensure improvement of objectives and processes	Measures not maintained. Not communicated. Insufficient actions against measures. Insufficient resources allocated to maintain measures.	2	1	2	ALARP (Acceptable Risk)	No
Internal 7. Products & Services	To comply to customer and statutory/regulatory requirements where applicable.	Non-conforming product/non-compliance to customer requirements.	3	1	3		No
Internal 8. Targeted Communications	Companywide emailing function. Important Business Developments, Changes to Systems or Processes cascaded via this function. Process or System issues/development 'News flashes' and 'TOOLBOX' Talks communicated to relevant personnel	Communication not understood and subsequently ignored. Non-conforming practices encouraged. Key Personnel missed. Feedback and Competency not evaluated within SMART timeframes.	2	2	4		No

Internal 9. Owners/Shareholders	Company meets financial return and other needs of shareholders	Failure to meet Owners/shareholders expectations	2	1	2	ALARP (Acceptable Risk)	No
Internal 10. Employees	Employee contract, agreed working terms, job description, progression, training and security. Internal Promotion and Career Development driven by Top Management.	Failure to meet company contract requirements may result in termination. Potential for non-adherence to processes, leading to non-conforming product or potential environmental incidents.	3	1	3		No
External 1. Markets	Company understands the market in which it operates, using distributors, catalogues and e-commerce	Company does not understand the latest market needs and trends. Company does not align itself to market needs and conditions.	2	1	2	ALARP (Acceptable Risk)	No
External 2. Social attitudes	The company understands its social responsibility and operates a CSR policy. Ethical sourcing including FSC material	Non-adherence to policies, use of non-ethical suppliers (Use of non-sustainable wood sources)	2	1	2	ALARP (Acceptable Risk)	No
External 3. Financial	Financial controls and resources in place. The company understand external currency factors	Inadequate financial controls.	2	1	2	ALARP (Acceptable Risk)	No
External 4. Environmental	Compliance obligations met, 14001 system in place. External environmental conditions that could have an impact on the company are understood (Climate change, floods, storms etc)	Non-adherence to EMS systems, non-adherence to compliance obligations. Business continuity arrangements inadequate.	3	1	3		No
External 5. Competition	The company understands the competition and their product range on offer.	Failure to develop product to keep ahead of competition. Failure to develop product to meet changing market needs.	2	1	2	ALARP (Acceptable Risk)	No
External 6. Economy and Politics	The company has flexibility to adapt to the UK economy and customer's changing needs	Not understanding changing needs, and not reacting to external economic factors.	2	1	2	ALARP (Acceptable Risk)	No
External 7. Legal	Compliance obligations are identified, reviewed and met	Non- compliance resulting in enforcers or regulators invoking fines, prosecution etc	2	1	2	ALARP (Acceptable Risk)	No

6.1.1 Opportunities.

Strategy, Process Name or Measure	Opportunity	I	P	Score	Action taken	Integrate?	Target Date	Who
Process 1 . Business planning and Work Planning	Promote active engagement and sharing of Knowledge and Ideas to further enhance QMS & EMS.	2	1	2	Review at monthly PRM. Devise a live active forum to enable idea sharing and evaluate market conditions.	Yes	Q4 2018	All
Process 3. One kerosene re-distillation site	Source additional and alternative Kerosene solvent redistills or recyclers. Further development and expansion of aqueous cleaning products to replace solvent products	2	1	2	Conduct a feasibility study to evaluate suitability of Alternative re-distillers.	No	Q3 2018	Purchasing/ HSEQ
Process 4. Failure to Supply or Supply out of spec kerosene and thinner products.	Evaluate services Tradebe provides. Review process and identify cost minimisations.	2	2	4	Liaise with Tradebe to provide us frequent calibration results on all their processes used to determine specification of our kerosene and Thinners products. Conduct our own external random verification samples at periodic intervals.	No	Q2 2018	HSEQ/Purchasing/ Tech Support
Process 8. 3 rd Party Disposal site failure	Develop and Expand waste disposal sites nationwide.	2	1	2	Waste collectables management team to identify and positively engage suitable waste disposal sites nationwide. Once all sites have been identified, tender out 'Book of Business' to obtain competitive quotations	Yes	Q2 2018	Collectables Service/ Purchasing/ HSEQ
Process 13. Training	Develop role specific Training Matrix, initiate company drive for peer coaching.	2	1	2	Training to identify all aspects of training required for each job role within company. Liaise with HSEQ to develop matrix. T & HSEQ departments to develop peer coaching procedure. Branch network to conduct regular coaching/competence evaluations.	Yes	Q4 2018	Training/HSEQ
Environmental 10. Permit conditions, WAMITAB Cover and DOC Requirements.	Evaluate COTC attendance requirements. Determine Calculation Range of COTC cover.	2	3	6	Liaise with EA to clarify their position on COTC Levels at our branch network. Review Training requirements of COTC to evaluate replacement.	Yes	Q1 2018	HSEQ.
Environmental 11. Fire	Bolster Company Fire procedure to encapsulate all aspects of fire prevention and minimisation.	1	3	3	Roll out of branch Fire Preventative Plan (FPP) for English Branches. Liaise with EA to ensure plans are fit for purpose.	No	Q1 2018	HSEQ.
Environmental 14. Waste Pre-acceptance and Branch Expansion.	Development of Safetykleen bespoke and unique branch permits.	3	3	9	Confirm with Dr Chris Hall at Environment Agency that Safetykleen waste business model does not need to follow sector guidance SG 5.06. Develop all branch permits to accept the same types of wastes.	Yes	Q1 2018	HSEQ/Collectables Services
Environmental 15. Definition of waste.	Evaluate the definitions of waste to all waste stream Sk Handles. Target initial focus on paint thinners waste, empty containers and waste oil.	3	3	9	Positive confirmation that 'Dirty' Machine Kerosene is NOT waste. Remove kerosene waste transactions from CRM system. Evaluate feasibility for waste SK paint thinners and empty plastics to become 'NOT' Waste	Yes	Q1 2018	HSEQ/Collectables Services
Internal 5. Knowledge and Competence.	Develop and internal coaching process to enhance levels of employee competence. Devise work handover process for retiring employees.	2	1	2	Training department to devise and develop a suitable internal coaching process for key employee roles. HSEQ and Training to Roll out process. Training and HSEQ to devise job handover process.	Yes	Q3 2018	Training/HSEQ/ Branch Management.

6.1.2 Environmental aspects.

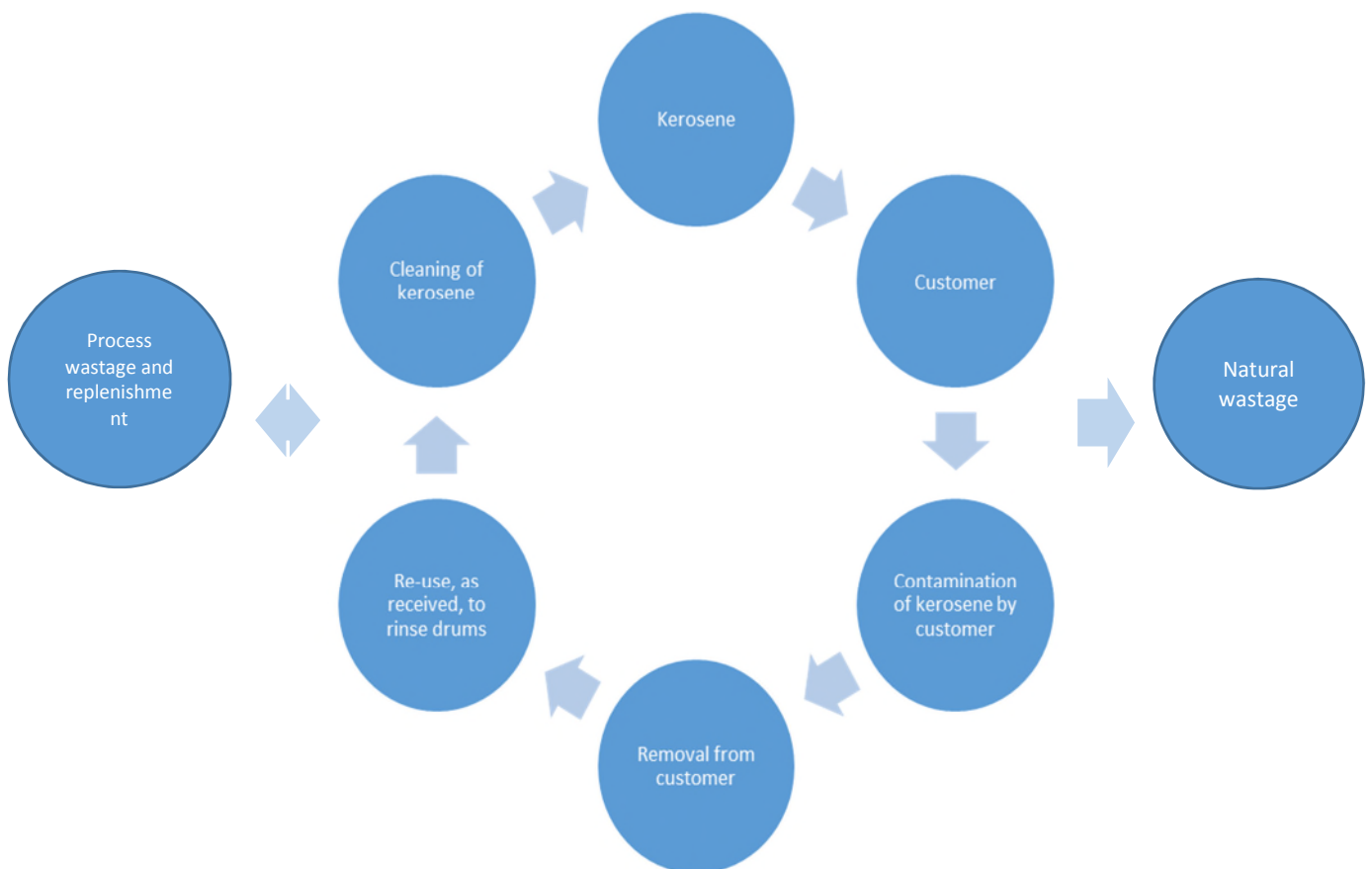
Safetykleen Subscribe to the “New Ground Legislation Update Service” The Legislation Update Service is an innovative and easy to use online product, providing organisations in England, Wales, Scotland, Northern Ireland and the Republic of Ireland with bespoke legal registers for environment, health & safety and food.

Work instruction 6.1.2 details the process

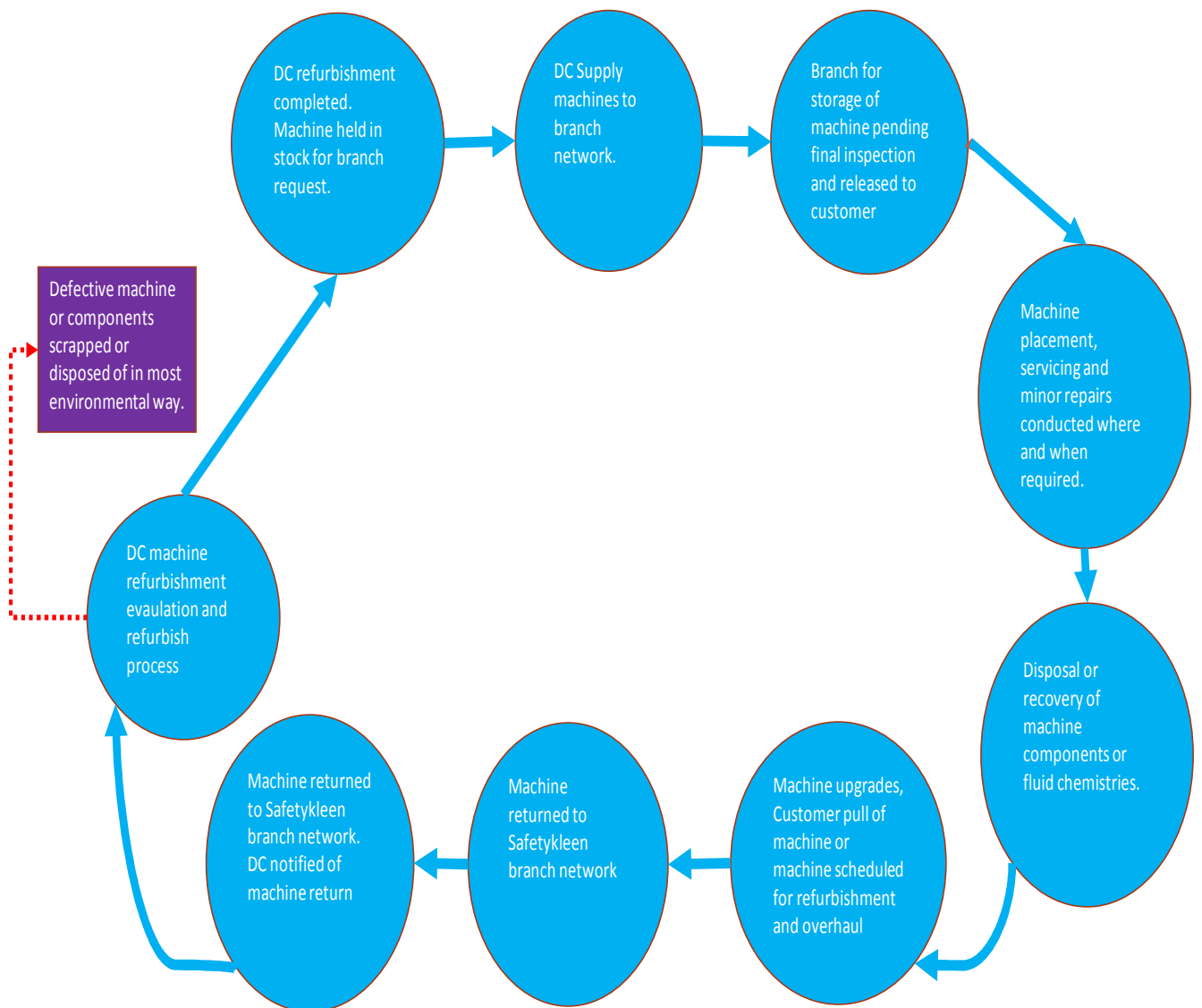
Life Cycle Analysis.

Safetykleen have focused on the one main business area with regard to life cycle analysis, machine servicing and chemistry recoveries.

Kerosene closed loop life cycle system.



Safetykleen Partswasher lifecycle



6.1.3 Compliance Obligations

The Legislation Update Service supports organisations to meet all of the compliance obligation requirements within the current management systems standards for environment, health & safety and food safety. The compliance obligations are derived from the legal register.

Work instruction 6.1.3 details the process

6.1.4 Planning action

See Section 8.1

6.2 Environmental objectives and planning to achieve them.

6.2.1 Environmental Objectives

Environmental objectives are derived from the New Ground Legislation Update Service (WI 6.2.1), monthly senior management review meetings and management review.

Compliance General Objective

All Safetykleen branches to achieve an FMIR pass score of 95% under the new system by January 2019.

Health & Safety

10% reduction in lost time accidents by January 2019.

10% Reduction in RIDDOR accident numbers by January 2019.

Environmental

Implementation of dirty machine based kerosene no longer waste.

Standardisation of Safetykleen branches environmental permits.

Quality

10% increase in overall branch customer satisfaction by January 2019.

All branches to achieve a FMIR Quality pass score of 95% by January 2019.

6.2.2 Planning actions to Achieve Environmental Objectives

In order to achieve continual improvement in environmental performance, and achieve objectives, it is necessary to document and implement management programmes for achieving the aims and objectives set out in the policy.

Strategic documentation in the form of training topics, Compliance alerts/notifications and bespoke projects are issued to the company in line with the objectives. The efficiency/effectiveness is measured and reported to the business via the monthly dashboard.

7 – Support.

7.1 – Resources

Resource for the achievement of Objectives and for the successful management of compliance related issues is discussed as an agenda item at the management review. (See section 9.3) and monthly period review meetings.

7.2 Competence

For a number of reasons, including environmental compliance, it is essential that employees are competent to perform their tasks. A person may be deemed competent when they can demonstrate an appropriate level of knowledge and experience. A competent person will also understand their own limitations.

Competence can be developed in a number of ways through a combination of:

- Briefings (induction, risk assessment, method statement, COSHH assessment, training topics, etc.)
- In-house and external training courses.
- On the job training (under appropriate supervision);
- Prior knowledge.

It is a line manager's responsibility to ensure that persons under their authority are competent to carry out any work activities that they are assigned.

Safetykleen utilise an in-house training department and an online Safety and Environmental training portal completed by employees, the data from this is held centrally. The mandatory monthly training topics are decided via performance against objectives, incidents and external factors, such as legislative change.

Our training department has developed a role specific training matrix including live completion deadlines.

7.3 Awareness

HSEQ Notice Board - Summary

HSEQ notice boards are an important source of relevant information. Some documents must be displayed as a matter of law. Other information includes environmental alerts which contain important and often urgent information. All employees are encouraged to review the HSEQ notice boards at their place of work on a regular basis to keep up to date with any new details.

Safetykleen notice boards should typically include:

- Health and Safety Law Poster (mandatory)
- HSEQ Alerts
- Safetykleen Health and Safety, Environmental and Quality Policy Statements
- Notices regarding emergency arrangements (fire and first aid)
- Employer, public and vehicle liability insurance certificates (mandatory)
- Current alerts and bulletins

Local Facilities Administrators are responsible for ensuring that HSEQ noticeboards are maintained as necessary. This section includes relevant details including a standard Safetykleen HSEQ noticeboard layout.

Alerts & HSEQ Briefings

Training topics and HSEQ briefings are a useful way to keep environmental areas forefront in the minds of your workers and make them aware of current risks and hazards. Such briefings by subject specialists/supervisors/managers/directors to all workers help to foster a good environmental culture.

Training topics allow you and your staff to explore the risks of specific environmental issues on your site, and think about ways to deal with them. Training topics should focus on a single topic and be held regularly for greatest impact.

Safetykleen operate a standard programme of Training topics as this should reflect the needs of the business, site and team. Line Managers at all levels are considered empowered to create and deliver training topics, though there are also course materials on the Safetykleen Sharepoint system.

Training topics and briefings should be recorded on training topic forms.

Some general points when designing a briefing or training topic are:

- Most peoples' attention span is limited;
- Briefings should be exactly that – BRIEF;
- Prepare key points to put over, and focus on delivering them well. Repeat the main points at the beginning and end of the talk;
- Most people will only remember 25%-50% of what you said, so you may need to think about briefing cards or putting the key points from the safety briefings on the notice board. If you want your listeners to remember more than about five points, give them a prompt list to go away with.
- Ask questions and encourage interaction as much as possible;
- In every training topic or safety briefing, remember it is important to make sure your workers know that if at any time they consider they are working in an unsafe way, that puts themselves or others at risk, they can **STOP, report and seek advice!**

7.4 Communication

7.4.1 General

Newground

All Facility Administrators have been issued with "read only" access to the legislative update service, Newground. This allows the branch network to keep up to date with legislative changes relevant to our industry, it also provides the staff with a better understanding of environmental aspects that have the potential to effect the individual sites.

7.4.2 Internal Communication

HSEQ Alert – Summary

From time to time it will be necessary to alert employees to specific HSEQ issues. Such information may arise from a number of sources such as internal/external audits, accident reports and data from suppliers, environmental authorities etc.

Such information will be captured on HSEQ alerts which will be circulated to employees.

7.4.3 External Communication

Safetykleen employ dedicated customer care, marketing and business development managers, who manage external communications. Anything pertinent to the environmental management system will be driven by the Compliance department.

7.5 Documented Information

7.5.1 General

Documentation and Document Control - Summary

All Environmental Management System documents, with the exception of confidential records, are available on the Sharepoint system under Environment. Use of the system provides a controlled, secure and accessible platform for these documents.

Documentation shall be reviewed and updated regularly to ensure that it remains relevant to the business. Reviews shall be conducted periodically however; there may be a need for more frequent reviews in the event of:

- Process change (systems of work, materials, plant and equipment etc.);
- New or amended legislation;
- Accident or near miss investigations;
- Outcomes from safety inspections.

Standard forms, which may be reviewed on a less frequent basis, shall be maintained by the Compliance Department.

7.5.2 Creating and updating

All documents relevant to the management system will be created by the subject expert and reviewed by the Compliance department.

This documentation shall be reviewed and updated regularly to ensure that it remains relevant to the business. Reviews shall be conducted periodically however; there may be a need for more frequent reviews in the event of:

- Process change (systems of work, materials, plant and equipment etc.);
- New or amended legislation;
- Accident or near miss investigations;
- Outcomes from safety inspections.

7.5.3 Control of Documented information

The Sharepoint system shall be used as the primary means of controlling the Environmental Management System. All documents therein shall be the latest versions. All employees have access to view the documents. Amendments to this documentation can be made by the Compliance department only

Refer Quality Process QP04 – Documented Information and Data Control.

8 – Operation

8.1 – Operational Planning and Control

Safetykleen ensures that all significant environmental impacts are identified and entered in the Register of Environmental Aspects.

Any activity that the company deems to require close operational control are assigned a specific documented process:

- Disposal and control of effluent from process activities are described in environmental procedures EP1 and EP11.
- All spillages inside factory buildings are contained using absorbent materials, collected, and disposed of appropriately to prevent spillages into the drains. “Outside” surface water drains at some branches are routed to central interceptors or tanks, and all staff are required to comply with spillage procedures described in procedures EP1, EP2, and some BWI’s that relate to Surface Drainage Protection, to protect the sites’ drainage systems.
- Waste disposal and Duty of Care is controlled in accordance with procedure EP6, ensuring that the company meets the ‘Duty of Care’ requirements (Part II) of the Environmental Protection Act, 1990 (as amended) and the Hazardous Waste Regulations, 2005 (as amended). (Waste Management Act 1996 as amended) in the case of the Republic of Ireland.
- Particular attention is paid to the protection of the ground, ground waters and surface waters during delivery and storage of bulk liquids, such as waste oils and solvents collected from the Company’s customers. Handling of such liquids is controlled according to procedures EP1, EP2, and EP3.
- Emissions of VOC are controlled as part of the company’s Environmental Permits for which procedure EP4 applies. Management of VOC emissions is also specified in the SK Dublin branch’s waste licence conditions in which annual monitoring takes place from point source emissions on the flammable stores.
- Fire prevention is paramount as the Company handles very large quantities of flammable liquids. As the products are so easily combustible, the main prevention measures are strict adherence to fire prevention procedures as described in procedure EP2.
- The management of the site including maintenance of the Site Plan and environmental control procedures for the storm drains is described in procedure EP1.
- The monitoring of energy use and the conservation measures in place are described in procedure EP7.
- Control of goods vehicles and the control of fuel storage and usage are described in procedures EP1, EP2, and EP7.
- All suppliers and outside contractors engaged in activities that could have an impact on the environment, e.g. off-loading oils and chemicals, are only permitted to do so under the supervision of Company staff. The environmental credentials of all approved suppliers and sub-contractors are vetted according to procedure EP17.
- Control of nuisance complaints that could develop into statutory nuisance problems for the Company are dealt with according to procedure EP9.

8.2 – Emergency Preparedness and response

The company has a separate Health & Safety Management System that is designed to ensure full compliance with all applicable health and safety legislation and enacting regulations. This system also deals with the environmental implications of accidents and emergencies; all procedures are reviewed, and if necessary revised, each time an accident, incident or emergency occurs.

The control of fires and general emergencies is described in procedure EP2 and the document “Crisis Management Manuals”.

9 – Performance and Evaluation

9.1 – Monitoring Measurement and Evaluation

9.1.1 General

Safetykleen compile and maintain a dashboard covering a number of key metrics. This information is communicated to all levels of business.

9.1.2 Evaluation of Compliance

Safetykleen continually monitor compliance via a program of audits (FMIR) and site visits. Each site management team is responsible for their own compliance, in accordance with legislation and the company EMS.

9.2 – Internal Audit

9.2.1 General

All Safetykleen facilities and departments are audited in line with the policy below:

Introduction.

The FMIR is an arrangement devised by the Senior Management Team in conjunction with the Compliance Department, to audit all sites with respect to current ISO Certificated management systems and all current relevant Health and Safety, Environmental and Transport Acts and Regulations. All Auditable subsections of the FMIR and applicable procedures have been reviewed and authorised by both the UK Managing Director and Head of Compliance.

FMIR Procedure.

Each branch within the UK & Ireland network will be fully audited at least once during a calendar year. All FMIRs will be unannounced, however the auditing department will provide attendance schedule proposing branch FMIR visits on a quarterly basis.

It is the responsibility of the Branch to inform the auditing department that the nominated auditees (usually COTC holders) are available within the proposed schedule. Failure of the nominated persons to attend the branch FMIR will lead to the respective Branch failing the audit and a score of ZERO being recorded. A failure in these circumstances will lead to disciplinary action.

The Compliance Department will visit branches that they were not allocated to in the previous year FMIR audit schedule. The auditor will assess the Branch Services, Collectable Services Department and the Facilities Administrator. Each department audited will have an individual score, however all three scores will be used to determine the overall FMIR result. If a branch fails their FMIR then further announced audits will take place to ensure the branch meets the acceptable standard

The minimum acceptable FMIR pass score is set at 95%

Branch management are required to action all issues arising from the FMIR within the specific timeframes instructed by the auditor. Failure to complete all actions in the specific timeframes will result in a reduction of the final overall FMIR score by 15%.

FMIR scores ranging from 94% to 86% fall below the acceptable standard and will require remedial action as above. There may be further announced visits to check these actions had been completed.

Scores of 85% and below will require the RD and MD to oversee any specified remedial actions, scores of this level could result in performance review/disciplinary action for the branch management. There will be subsequent announced follow-up visits by the Compliance Team.

The scores resulting from revisit FMIR audits will not be used to amend the initial formal audit score.

9.2.2 Internal Audit Program

Each branch within the UK & Ireland network will be fully audited at least once during a calendar year. All FMIRs will be unannounced, however the auditing department will provide attendance schedule proposing branch FMIR visits on a quarterly basis.

Refer Quality Process QP03 – Internal Audit.

9.3 – Management Review

Period review meetings are held monthly and take into account the following:

- Internal and External issues
- Needs and expectations of interested parties
- Significant environmental aspects
- Risks and opportunities

Refer Quality Process QP02 – Management Responsibility and Review.

10 – Improvement

10.1 – General

1. Introduction

The Compliance Department continually reviews all improvement programme items. Each objective is listed in the following tables show the status of each objective, the revision dates, and corresponding notes from the meetings. All previously completed objectives have been removed from this document but are available from archived files.

1. Table 1, Index

Ref. No.	Title	Led By	Start Date	Comp. Date
2.0	Energy Conservation and Carbon footprint calculation	PW/AH	09/2010	Ongoing
3.0	Transport Impact Reduction	PA	09/2016	Ongoing
4.0	Site Developments	PW	01/2009	Ongoing
5.0	Training Database	MP	03/2018	Ongoing
6.0	Spill reduction	DC/KG	01/2018	Ongoing
7.0	Permit Standardisation	DC/KG	01/2018	Ongoing

Objective No 2.0: Energy Conservation and Carbon footprint Calculation

Programme Summary:	Review Date	Status
<p>A Europe wide carbon foot printing exercise is being completed. As a result of this study Safetykleen will install measures to reduce the carbon footprint to involve all aspects of the business such as facilities, products, machines and transport.</p> <p>Project Leaders: Phil Wicks/Andrew Homes</p> <p>Target date for Completion: Report back at Senior Management review meeting.</p> <p>Project Funding: All departmental budgets.</p>		
Project now with European Management – Follow up with Andrew Homes	05/2012	Ongoing
Project at its infancy stage research to be conducted on all business aspects of Safetykleen. Compliance department will be involved where necessary.	09/2010	Complete

Objective No 3.0: Transport Impact Reduction -- Fuels

Programme Summary:	Review Date	Status
<p>The Company has instigated a fleet renewal programme in 2016 which is now a rolling project with vehicles being replaced every 5, 6 and 7 years (vehicle category dependant). Prior to each annual replacement programme a review of vehicle technology is carried out to determine to most appropriate vehicle to be ordered.</p> <p>Project Leader: Paul Astbury</p> <p>Target date for Completion: Ongoing vehicle development</p> <p>Project Funding: Transport budget D5000</p>		
<p>Ryder trucks were appointed in 2016 and 123 vehicles were replaced in phase 1. All were ordered with Euro 6 technology replacing Euro 4</p>	09/2016	Complete
<p>Phase 2 is being rolled out in October when a further 60 vehicles expire contract. 55 like for like replacements are being ordered with 5 being replaced with larger vehicles where multiple van visits are made daily to reduce labour time, fuel cost and carbon footprint.</p>	01/02/2017	Complete
<p>Phase 3 is being rolled out in January 2019 where 9 oil tankers expire contract. During phase 2 an assessment will be made of vehicle replacements to determine the most efficient and environmental way of replacing vehicles</p>	01/10/2018	Ongoing
<p>During phase 1 of the vehicle replacement programme, 3 double deck trailers were introduced to SK fleet after a review of our routing activities. The purpose was to reduce the number of trips necessary to branches with standard curtain sided trailers. During the 12 months they have been in use we have reduced the number of trips by 98 relatable to this activity. As a result a further trailer is currently being considered in phase 3</p>	01/10/2018	Ongoing
<p>In phase 1, 7 articulated vehicles we're replaced. The 7 new vehicles were fitted with anti-idling devises. Any artic now idle for 5 minutes auto shuts off the engine. This has cut down 1254 hours of idling time vs prior year when measured through telematics provider masternaut.</p>	09/2016	Complete
<p>As part of our FORS accreditation we we're recredited to bronze membership in September 2017, we are currently in the process of progressing the accreditation to FORS Silver standard. As a result we have data to measure tonnes of Co2 and Kgs of Nox produced by each vehicle across the fleet.</p>	01/2019	Ongoing
<p>In September 2017 we introduced a routing policy to assist our sales managers across our branches in route planning. The purpose of the policy is to cut down on unnecessary journeys and to avoid certain areas during peak times. The introduction of ERP to our branches has cut down the need for manual routing with the system auto routing vehicles in the</p>	09/2017	Ongoing

most efficient manner taking routes from our telematics provide Masternaut.		
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Objective No 4.0: Site Development

Programme Summary:	Review Date	Status
<p>Improvements will be sought in the areas of better environmental protection of drains; improved materials handling and storage areas; expansion plans and the continual development of new premises.</p> <p>Project Leader: Phil Wicks</p> <p>Target date for Completion: Ongoing</p> <p>Project Funding: Department budgets.</p>		
Bristol:		
Environmental Permit variation received and all Management staff trained in the new instructions for offloading wastes in the demarked area.	09/2010	Complete
An environmental permit modification is required to allow vehicles to load and offload in a designated demarked area. This is in agreement with the Environment Agency providing that a modification to the Environmental Permit is completed.	01/2009	Complete
Dinnington:		
The new Environmental permit for site has been received. The old Environmental permit has been annulled. The waste transfer station continues to be operated by Tradebe. The new kerosene and aqueous storage tanks have been installed.	09/2010	Complete
The storage tanks for both kerosene and the aqueous tanks are to be installed in the new licensed area for branch 280. The Environment Agency will be notified when the tanks are ready for use. As the site currently operates two environmental permits the Environment Agency will be approached to have the old permit surrendered or moth balled.	01/2009	Complete
Exeter:		
New Unit procured for dry goods storage and office facilities. Offices to have green fixtures and fittings (Details available via PW)	06/2012	Complete
Bury St Edmunds:		

The amended Environmental Permit has been received the aqueous tank still needs to be installed when funds are available.	09/2010	Ongoing
Stirling:		
The Waste Management Licence for Stirling is out of date and requires amending to reflect the wastes collected by the Waste collection business of Safetykleen. The wastes that Stirling is not licensed for are being transferred directly to 3 rd party disposal sites.	09/2010	Complete
Wigan		
Drainage and roll over bunds installed.	09/2010	Complete
Drainage improvements to upgrade containment within the building to go ahead in order to protect surface drains to the exterior of the front of the branch.	01/2009	Complete
Site improvements and penstock valve to be installed in 2018 to provide improved containment and storage of waste.	01/2018	Ongoing
Distribution Centre		
Installation of Kleenstrip machines in the solvent cleaning area to reduce noise levels.	01/2018	Complete
7 day timers installed on all heating controls throughout the UK		Complete

Objective No. 5.0: Training Database

Programme Summary:	Review Date	Status
<p>A new training database is to be used to help improve the standard of all types of training</p> <p>Project Leader: Michael Phillips</p> <p>Target date for Completion: 2018</p> <p>Project Funding: Training budget.</p>	01/2018	Ongoing
Training admin now developing a bespoke system (initially spreadsheet) for training tracking and implementation	01/2018	Ongoing

Objective No. 6.0: Spill Reduction

Programme Summary:	Review Date	Status
Log all spill information and aim for reduction in total number by prioritising and targeting specific root causes	01/2018	Ongoing

Objective No. 7.0 Permit Modification

Programme Summary:	Review Date	Status
Implementation of standard permit, with varied working plans by year end	01/2018	Ongoing

10.2 – Non conformity and Corrective action

Nonconformity, Corrective Action, and Preventive Action

In the event of an environmental incident, compliance issue, or audit non-conformance, the HSEQ Department initiates the following action:

- Ensure restoration of conformance or compliance as quickly as possible following an internal audit.
- Investigate the cause of the non-conformance
- Initiate corrective action
- Review procedures and institute longer-term preventive measures.
- Establish, report and correct any adverse environmental impacts arising from operational incidents as quickly as possible. If preventive action requires implementation over an extended period, it is listed as an improvement objective.

Refer Quality Process QP06 – Corrective and Preventative Actions.

10.3 – Continual improvement

Continual improvement will be reflected directly in achieving the environmental objectives of the company and via trend analysis from company environmental data, driven by management review. (Section 9 of this manual).

Safetykleen shall continuously monitor, review and plan to reduce the risks identified in section 6.1.1 (risks and opportunities) of this document. This will aid in the realisation of improvements within various processes and by addressing the potential risks may assist by introducing new opportunities. By working closely with other functional departments within the company, this will ensure the suitability and adequacy of the EMS to enhance environmental performance.