

ENVIRONMENTAL PROCEDURES

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E.1 Introduction;

The purpose of these procedures is to present the proposed control measures, and to address the environmental impacts that are applicable to Dragonfly Contracts Ltd Limited (Dragonfly Contracts Ltd). The identification of these environmental impacts will establish the strategy to be followed to reduce the environmental impacts of operations within Dragonfly Contracts Ltd.

These procedures will identify what environmental issues need to be managed during works in construction and the office environment with respect to Dragonfly Contracts Ltd. Also these procedures will outline the measures to be taken in the instance of an environmental accident/incident.

E1.2 Environmental Policy Statement;

DRAGONFLY CONTRACTS LTD undertake to:

Comply with all statutory and regulatory requirements.

Comply with our clients' environmental policy requirements.

Identify and evaluate the environmental consequences of the Company's activities.

Promote and support 'best practice' for maximising environmental benefit, to encourage environmental improvement and minimise the potential for environmental damage that may be caused by our operations

Educate and train our employees to promote awareness and understanding of environmental issues.

Ensure that any sub-contractors demonstrate compliance with our environmental policy and that of our clients.

Minimise the total quantity of waste produced by our operations and maximise recycling of any waste produced

Where applicable, liaise closely with statutory and local authorities, clients, third party organisations and the general public.

Review our environmental performance and that of our sub-contractors by regular auditing of operations, identify and rectify any deficiencies and promote continuous improvement.

Establish and maintain an effective Environmental Management System to complement our core business operations, supported by proven Environmental Consultants where necessary.

This policy applies to all employees of Dragonfly Contracts Ltd.

Date: 25/01/2022


 JOE MCKENNA
 MD

Managing Director

Dragonfly Contracts Ltd

E1.3 Environmental Impacts;

Where the Company's (Dragonfly Contracts Ltd) activities impact on the environment the effects of these activities shall be considered in respect to its locality so that any adverse effects may be identified, evaluated and addressed accordingly.

Dragonfly Contracts Ltd will prepare environmental procedures and guidance to meet the statutory requirements and where necessary prepare specific environmental impact assessments that will also comply with best practice and local environmental incentive schemes.

The major environmental impacts that Dragonfly Contracts Ltd has been identified:-

Noise

Dust

Vibration

Waste Removal (Construction/Offices)

Energy Usage (Construction/Offices)

Land Contamination – Construction Waste/Substances

Water Pollution – Waste Material

Storage and use of fuels and oils (Minimal Impact)

Storage and use of chemicals e.g. paints (Minimal Impact)

Construction traffic (Air Emissions)

Statutory Nuisance – Noise/Dust

Protection of Local Wildlife

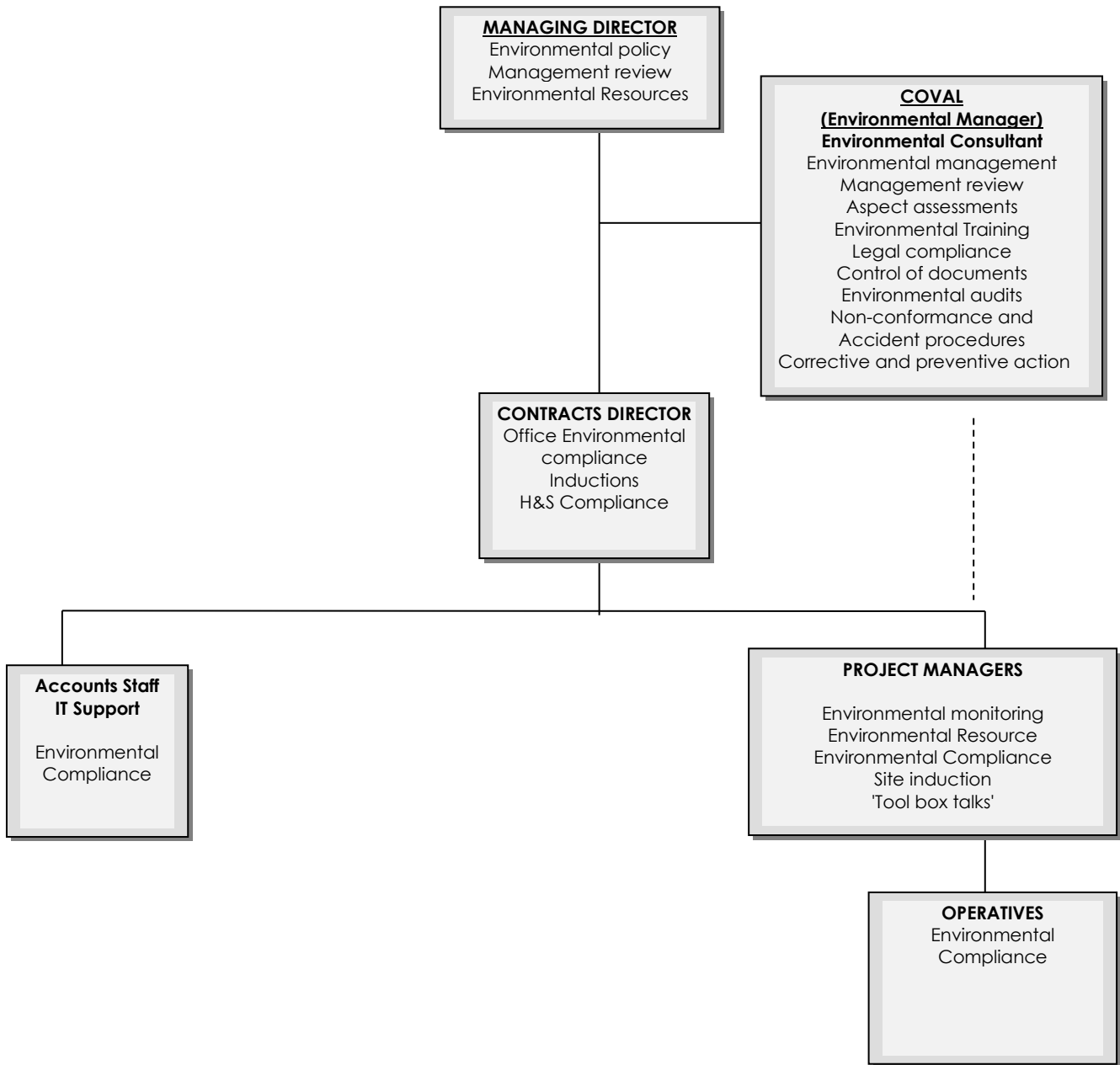
E1.4 Environmental Management and Environmental responsibilities;

Dragonfly Contracts Ltd will fully support the fundamental environmental objectives laid out within the company policy, with the aim of minimising the impact of the company's activities on the environment.

This will be done by having a company management system which will control the day to day environmental issues and monitor the effectiveness of the system.

As a company Dragonfly Contracts Ltd will appoint staff who are competent and are aware of the best practices and satisfactory requirements that are placed on our work. These people will be accountable for the practical application of the requirements of these procedures in the workplace. It is expected that all employees on their part are to contribute to achieving the targets of the company policy.

Environmental Management:



Duties of the Managing Director;

In addition to his general director duties the director shall have additional responsibilities for: -

- a) Providing a Company environmental statement outlining the companies Environmental Strategy,
- b) Ensuring that the environmental statutory provisions are being met, by employing a competent person to inform the company of such issues (Internal/External),
- c) During meetings with the Contracts/Projects Managers he should ensure that the environmental performance targets have been achieved, and he receives feedback on all environmental issues and complaints,
- d) He shall ensure the Board are informed of any major environmental issues affecting or likely to affect the Company, and through the Board promote a pro-active approach on such issues,
- e) Ensure there is sufficient environmental advice and awareness at all levels of the Company,
- f) Ensure that resources are made available in relation to the company's environmental strategy,

Duties of Directors and Other Senior Managers;

Directors and senior staff should implement the Policy by: -

- a) To ensure that they are fully aware of their Environmental Policy and procedures,
- b) Monitoring environmental performance through on-site meetings and responding to actual site conditions observed when on routine site inspections,
- c) When holding meetings with employees and other interested parties ensure environmental issues are discussed and receive comments and suggestions on ways in which the Company's performance can be improved,
- d) Setting a good personal example and having adequate knowledge of environmental legislation relating to aspects of the Company's activity,

Duties of Project Managers;

Their duties are to: -

- a) Understand the Company Environmental Policy and ensure it is brought to the attention of all employees, particularly new starters, and contractors through induction talks,
- b) Have adequate knowledge of legal requirements and good working practices,
- c) Ensuring that all necessary registers and records are maintained and that persons under your control are adequately trained to enable them to understand their role in environmental issues,
- d) Ensure that the necessary environmental assessments have been carried out and recorded. The main findings of these assessments should be brought to the attention of the site staff along with the health & safety risk assessments during induction programmes,
- e) Ensure that adequate arrangements are made with regards to waste procedures to both minimise waste and to ensure waste is correctly classified and handled,
- f) In planning the site layout and work give due regard to environmental issues as identified in the assessment,
- g) Ensure any environmental incident is reported in accordance with Company procedures,
- h) Set a good personal example at all times,

Duties of the Environmental Manager;

Their duties are to:

- a) To ensure that the current Environmental Policy/Procedures are kept current and are made available to all employees and interested third parties,
- b) Ensuring that all environmental procedures and control measures are carried out in line with current statutory provisions,
- c) Ensuring that staff and contractors at all levels receive appropriate training to enable them to understand environmental issues and the important role they play in minimising negative environmental impact,
- d) Monitoring environmental performance through on site meetings and responding to actual site conditions observed when on routine site inspections,
- e) To compile Environmental Impact/Risk Assessment in relation to the company's activities,

- f) When holding meetings with employees and other interested parties ensure environmental issues are discussed and receive comments and suggestions on ways in which the Company's performance can be improved,
- g) All environmental documentation is controlled/issued and archived,
- h) Ensuring that environmental issues are part of the agenda of any senior management meeting or board meeting,
- i) Setting a good personal example and having adequate knowledge of environmental legislation relating to aspects of the Company's activity,
- j) To communicate and liaise with outside external agencies,
- k) To carry out regular environmental audits and record their findings to present at company meetings. Also to instigate any necessary corrective actions,
- l) To ensure that company targets and objectives are being met,

Duties of the Environmental Consultant;

Their duties are to:

- a) To ensure that the current Environmental Policy/Procedures are kept current and comply with statutory provisions and agreed best practice,
- b) To advise on setting company objectives and targets,
- c) To carry out environmental audits/inspections as requested, and compile a formal written report for the Environmental Manager,
- d) To assist in the company's emergency response planning,
- e) To carry out environmental awareness training as requested,
- f) To review and update the company's environmental policy and procedures as changes in legislation occur (normally April/October),

Duties of Office Based Managers and Office Supervisors;

Their duties are to:

- a) Understand the Company's environmental policy and ensure it is brought to the attention of all employees, particularly new employees and temporary employees, through induction talks,
- b) Have adequate knowledge of environmental requirements and practices as they relate to your work and that of the office. Assist and encourage staff to be more environmentally aware in the every day workings of the office,

- c) Ensure compliance with all waste segregation and energy reduction incentives,
- d) Ensure any environmental incident is reported in accordance with Company policy,
- e) Set a good personal example at all times,

Duties of All Staff and Operatives;

The Company has a strong commitment to health & safety and environmental issues. To be successful, the Company needs your assistance in following the Company's procedures and so minimising its risk. In addition the Company needs employees to be pro-active in these areas in identifying areas in which improvements can be made and informing their supervisors.

Contractors;

Contractors must familiarise themselves with the requirements of these environmental procedures and ensure that they comply fully with them at all times. If at any point they identify any unforeseen environmental hazard, then it must be reported immediately to Dragonfly Contracts Ltd management. All documents produced must comply with the environmental procedures laid down by Dragonfly Contracts Ltd.

Suppliers;

Suppliers must ensure that all products/materials provided, comply fully with statutory requirements/best practice. Materials must be supplied with the correct documentation (MSDS) and limited packaging. Before any products/materials are supplied to the company you will be asked to complete a supplier's questionnaire to ensure compliance with our own environmental procedures.

We may also require your products to be pre-cut prior to entering our project, also packaging to be kept to a minimum.

E1.5 Compliance with Legislation.

There is a wide variety of legislation that is applicable to Dragonfly Contracts Ltd activities. The following list of legislation is the main acts and regulations and directives that are applicable to Dragonfly Contracts Ltd work.

- Environmental Protection (duty of care) Regulations 1991 (Amended 2003).
- Control of Pollution (amendment) Act 1974.
- Control of Substances Hazardous to Health 2002 (Amended 2004)
- Environmental Protection Act 1990.

- Hazardous Waste Regulations 2005 (As Amended)
- List of Wastes (England) Regulations 2005
- Landfill (England and Wales) Regulations 2002, as amended (2004 and 2005)
- Waste Management Regulations 1994 (As Amended)
- The Clean Air Act 1999 (As Amended).
- Health and Safety at Work (etc) Act 1974.
- Water Resources Act 1991 Part III (as amended by Water Act 2003)
- Pollution Prevention and Control Act 1999
- Air Quality Regulations 2000
- The Control of Asbestos at Work Regulations 2006
- The Site Waste Management Plan Regulations 2008
- Environmental Protection (Controls on Substances that Deplete the Ozone Layer Regulations 1996 (as amended)
- Control of Major Accident Hazards Regulations 1999 (COMAH),
- The Producer Responsibility Obligations (Packaging Waste) Regulations 1997 (as amended 1999)
- Waste Electrical & Electronic Equipment Regulations 2006 (WEEE Regulations)
- Water Resources Act 1991 (Amended)
- Groundwater Regulations 1998
- Control of Pollution (Oil Storage) (England) Regulations 2001

A summary of Dragonfly Contracts Ltd duties, company policy and responsibilities can be seen in the enclosed register of regulations. Through this identification of duties and responsibilities the company aims to meet the legal requirements placed upon it.

E1.6 Environmental Procedures

Construction;

Dragonfly Contracts Ltd understand their duties as defined by the above legislation and aim to comply with the legislation by taking appropriate steps to prevent polluting material from work areas contaminating water, soil or air. A Project Specific Environmental Plan will be produced for each project, this will outline in detail all measures to be taken to minimise any impact on the environment.

Wherever possible hazardous and polluting materials will be kept to a minimum, unless large quantities of a single material are required urgently, otherwise materials will be supplied on demand. When materials are to be stored within the workplace they will be required to be segregated into special areas as is required by various legislation.

The appropriate manufacturers data sheet and COSHH assessment will be issued prior to use, which will detail the control measures to be put into place.

Also an overall emergency plan will be prepared to ensure appropriate procedures are in place to prevent and mitigate damage due to accidental releases, spillage's etc.

In the event of a pollutant being released prompt action will be taken by Dragonfly Contracts Ltd to minimise the effect in accordance with the appropriate emergency procedures. In the event of an emergency the workplace management will be notified of what actions are to be taken and if-co-operation is required to secure the release and prevent exposure to personnel/property.

All accidental releases will be investigated by Dragonfly Contracts Ltd and the resulting report will be submitted to the Construction Manager. The incident report will propose corrective actions to be taken along with a timescale for them to be implemented.

This is a general mission statement; a full Environmental Construction Plan will be produced for each project.

Offices;

We aim to ensure that all waste materials generated from the office environment are segregated into the following categories;

- Recycle – Paper
- Reuse – Printer Cartridges
- Disposal – General Items (Kitchen waste etc)
- Disposal of plastic drinking vessels

This will be achieved by all offices being equipped with waste bins clearly marked to identify its waste disposal route. Our policy is to also train all office staff to dispose of waste materials correctly, as to reduce our impact on the amount of landfill waste generated within our offices.

Some items, such as printer cartridges (Photocopiers) will be removed from our offices by the supplier and new cartridges left. Desktop printer cartridges will be collected and sent for recharging.

We aim to ensure that all paper used within the offices is recycled, through the specific waste stream. All purchasing of stationary materials will be supervised by management to ensure that the supplier used is environmentally competent in carrying out his legal and morale duties to reduce impacts on the environment.

We will aim to reduce the amount of energy used within the offices by ensuring that while the heating is on, no windows are left open or ajar. Office lights will be switched off when not required (natural light), to encourage the office staff to comply with these procedures, signs will be posted on top of all light switches. Lights in corridors and stairs will encourage the use of sensor lights which will come on only when identifying movement and will switch off after a period of time this will prevent the continuous use of electric lighting.

Environmental Emergencies;

The purpose of this procedure is to detail the actions to be taken when dealing with an environmental emergency. Three kinds of likely environmental emergencies have been identified by Dragonfly Contracts Ltd. These are:-

- Fire
- Explosion
- Spillage.

In order to prevent or minimise the likelihood of environmental emergencies from spillage the company will list all materials, which have a significant environmental impact. For

each of these materials assessment sheets will be compiled by a competent person, which will identify the hazards both to the environment and to employee's health and safety.

All materials that present a hazard through spillage will be stored in accordance with the manufacturers' guidelines and various legislation. Where necessary, when large quantities of materials are stored then appropriate training will be provided to employees regarding the actions to be taken if a spillage occurs. Any necessary equipment to be used in the event of a spillage such as water hoses, brushes, sand, absorbent granules will be readily available at all working areas.

In order to prevent or minimise the likelihood of fire/Explosion we will operate a no hot works/smoking policy in areas where flammable materials are stored, or any area /operation that there is a risk of fire or explosion occurring. The Company will also inform employees of defined emergency procedures, which are to be taken in the event of fire and position safety signs giving instructions on what to do in the event of fire.

In the event of the fire brigade having to be called, details of the chemicals and products on site will be available from the Project Manager/Site File.

Any spillage's which enter outside drains will be reported to the local water authority without delay. In the event of a fire or explosion the company emergency procedure must be followed. If the fire brigade is summoned, full information related to products and materials must be supplied.

Dragonfly Contracts Ltd will follow any guidelines laid down by the Client or local authority procedures.

All construction projects will be equipped with a spillage kit and a detailed set of spillage instructions to be adhered to. All spillages will be reported to the Environmental Manager, so she can investigate to ensure that there is no re-occurrence.

E1.7 Noise at Work (Statutory Nuisance);

The purpose of this procedure is to detail the actions to be taken to deal with any noise nuisance the company produces on site.

Noise is subject to the provisions of the Environmental Protection Act 1990 Part III and the Control of Pollution Act 1974 sections 60 and 61 and is defined as a statutory nuisance. A statutory nuisance is an unlawful interference with a person's use or enjoyment or of some right over, on in connection with it. To ensure compliance with the regulations the company will ensure that:-

Suitable measures are taken to ensure levels of noise are kept to a minimum. Where necessary noisier equipment will be switched off during hours where noise needs to be reduced.

Machinery and plant are regularly maintained to reduce levels of noise.

We will act on any advice given on levels of noise and undertake regular monitoring of noise levels within the company's operations.

Dragonfly Contracts Ltd will provide suitably qualified personnel to ensure adherence to the provisions of the Control of Pollution Act 1974 sections 60 and 61 and associated legislation.

We will always attempt to reduce the level of noise created by their work operations, and ensure all other contractors working for the company comply.

Provide clients with information on measures being taken to control noise levels and any additional measures that may be required. Provide all necessary ear protection to employees at risk and ensure that this is used in accordance with legal requirements.

Provide and place warning signs dealing with noise and the hazard it presents.

E1.8 Storage of Fuels, Oils and Chemicals;

Dragonfly Contracts Ltd will act on any requirements placed on it by the changes in legislation/best practice. Dragonfly Contracts Ltd will advise all existing and future clients of arrangements for the handling, storage and usage of fuel, oil and chemicals in advance of the material being brought onto the workplace.

Where feasible, Dragonfly Contracts Ltd will attempt to keep the minimum quantities of fuels, oils and chemicals on workplace at any one time, and these resources will be removed when no longer required or disposed of in accordance with the relevant legislation.

All fuel tanks to be used within the workplace for the storage of fuel/oil should be manufactured to a recognised standard complying with BS799 for steel tanks and OFST100 for Polyethylene tanks/CE marked.

All fuels, and oil stored will be in a bowser which will be properly maintained and when not in use stored within a temporary bund sufficient to hold 110% of the volume of the largest tank (If not double skinned). The bund will be a minimum of 750mm from the tank to the bund wall and a minimum of 600mm between the tank and its base. All bunds should be lined with an impermeable material capable of retaining the oil stored within. Facilities should be provided so that rainwater can be removed from the bund at any time, precautions should be taken if rainwater is contaminated with oil.

The contents of the tank at the tanks capacity should be clearly identified by a label attached to the bowser.

Filling and re-fuelling will be strictly controlled and where possible confined to a location remote from any watercourses or drains. During re-fuelling a drip tray will be used to collect any spillages.

It should be ensured that a suitable fire extinguisher is provided with the bowser at all times. All waste oils, fuels etc will be removed from site via a licensed waste contractor for disposal in the proper manner, as required under the Hazardous Waste Regulations 2005. Bowsers will be fitted with a lockable valve between the tank and the dispensing hose, the

dispensing hose will comply with the relevant British Standard and will be properly maintained. A lockable nozzle will be fitted to the end of the hose.

When the contents are not being dispensed from the bowser the valve and dispensing nozzle will be locked shut at all times. All bowzers will be clearly marked to show the contents and the associated hazards along with the Dragonfly Contracts Ltd name. If drain plugs or drain valves are fitted to bowzers they will be properly maintained and firmly secured or locked at all times.

Where chemicals require storing then this will be done in accordance with the guidelines for their storage (MSDS). These will be stored in sealed tins until required and measures put into place in case of spill or leak. These will be stored in a secure container (metal locker) or compound.

Flammable liquids shall be kept stored in metal lockers, which are appropriately marked. Note should be made of measures to be taken in the event of spillage and suitable materials should be available to soak up the spillage and to ventilate the area.

Only sufficient material should be kept on site for the tasks in hand. Any material that is not required should be returned to the stores or disposed of in the correct manner.

Site storage should be located away from drains and watercourses so that if accidental release occurs then action can be taken to prevent entry.

E1.9 Disposal of Waste

Section 34 of the Environmental Protection Act 1990 introduces a "Duty of Care" for anyone who produces, imports, carries, keeps, treats or disposes of controlled waste. Controlled waste includes domestic waste, scrap materials, excavated materials etc. Every person who is subject to a duty of care must ensure that not only do they not commit an offence, but also take steps to prevent any other person involved in handling waste from committing an offence.

Dragonfly Contracts Ltd will submit details to the client prior to starting on site of proposals for handling storage, carriage and disposal of waste.

Any hazardous waste that is created during construction work will be dealt with accordingly. e.g. Paint tins will be disposed of via a licensed waste contractor in accordance with the Hazardous Waste Regulations 2005.

Discharge of effluent chemical waste of any kind into any river, waterway or drainage system will not be allowed. The burning of rubbish is not permitted on site.

Dragonfly Contracts Ltd will advise the Client of any waste disposal companies it proposes to use and will provide details of licenses etc. The company will also verify where required landfill sites or points of disposal it proposes to use. The following documentation will be collected from the waste contractor prior to any disposal;

- Premises code (Disposal of Hazardous Waste)
- Waste Carriers Licence
- Waste Management (Permit)
- Transfer notes/Consignment notes

The company environmental manager will check the records of any waste consignments and licences (Premises Code) during his monitoring of operations.

Disposal of waste operations will comply with statutory requirements at all times and waste transfer notes/consignment notes will be retained for the designated periods as follows:

- Waste Transfer Notes – 2 Years
- Waste Consignment Notes – 3 Years

Waste will be packed and stored in the appropriate containers, which will prevent spillages, or contamination. Waste will not be mixed with other waste that may contaminate it and change its properties.

Waste will be kept to a minimum on site and be stored in separate areas with divisions between hazardous and non-hazardous waste.

E1.10 Construction Plant

The use of construction plant on site is occasionally used during Dragonfly Contracts Ltd activities; to ensure that these do not have a significant impact on the environment Dragonfly Contracts Ltd will undertake the following steps:

1. Only use vehicles and plant that meet a recognised standard. All vehicles on site should meet the relevant standards for emissions as required by the Department of Transport i.e. MOT emission tests. Plant will be regularly monitored and maintained so that it's run efficiently therefore burning less fuel and producing fewer emissions.
2. Regularly maintain and clean plant to ensure the best performance from the machinery as possible.
3. Plant and vehicles are to be used in accordance with site requirements only and turned off when not in use.
4. Where possible or necessary electrical plant may be used as an alternative.
5. Re-Fuelling procedure to be followed for all vehicles and plant.
6. If there are any problems with plant or vehicles then plant maintenance must be notified immediately.
7. Operators are expected to carry out examination of their plant on a regular basis. Plant should not be left on if not in use.
8. Excessively noisy plant may be restricted to certain hours of work if required.
9. All plant will have current certification to say it is in good working order.

E1.11 Environmental Reviews/Inspections Reviews;

We as a company aim to have biannual environmental reviews to address the following issues;

- Assessment, control and reduction of the impact of the activity concerned on the various sectors of the environment
- Energy management, savings, choice and transportation; water management and savings
- Waste avoidance, recycling, re-use, transportation and disposal
- Evaluation, control and reduction of noise within and outside of the workplace
- Product planning (design, packaging, transportation, use and disposal)
- Environmental performance and practice of contractors, sub-contractors and suppliers
- Prevention and limitation of environmental accidents
- Contingency procedures in cases of environmental accidents
- Staff information and training on environmental issues
- External information on environmental issues
- Evaluation of company objectives, targets and training

This review will identify the issues which require attention, and the environmental programme (Management Review/Action) should be designed and implemented to properly address these issues.

Inspections;

The Environmental Manager will aim to carry out regular environmental inspections at all our workplaces to monitor the effectiveness of the Environmental Procedures and ensure compliance. During the annual environmental review the Environmental Manager can address possible improvement within the procedures and also action possible trends or accident/incident findings.

END