



joinery ltd

ENVIRONMENTAL SUSTAINABILITY AND WASTE MANAGEMENT POLICY

Our Company recognises our responsibilities under the Environmental Protection Act 1990 and we are committed to operating in such a way that work activities do not have a negative effect on the environment.

Our Policy is to:

- Wholly support and comply with or exceed the requirements of current Environmental Legislation and Codes of Practice.
- Minimise our waste and then re-use or recycle as much of it as possible, purchasing recycled items in preference to those produced from new.
- Purchase ethically sourced materials - ensuring the products being sourced are obtained in a responsible and sustainable way, that the Workers involved in making them are safe and treated fairly and that environmental and social impacts are taken into consideration during the sourcing process. Where applicable*, the products we use are UK Conformity Assessed (UKCA) marked (or CE marked until 31/12/2022). *NB: Not all products can have a UKCA (CE) marking as for some there is no harmonised standard to be tested against.
- For left-over paints and related products, we will offer to local charities or repaint schemes. For empty containers, we will use Manufacturers (e.g. Dulux Trade Centres) recycling schemes, or, where suitable, take to a local recycling centre. Where items cannot be recycled, we will dispose of taking into account the nature of the product in terms of hazardous waste disposal or not and use paint hardener to solidify leftover paint.
- Minimise energy and water usage in our buildings, vehicles and processes in order to conserve supplies and minimise our consumption of natural resources, especially where they are non-renewable.
- Operate and maintain Company vehicles with due regard to environmental issues as far as reasonably practicable, encourage the use of alternative means of transport and vehicle sharing as appropriate.
- Apply the principles of continuous improvement in respect of air, water, noise, dust, mud and light pollution from our premises and construction sites and reduce any impacts from our operations on the environment and Local Community.
- Advising our Customers on energy efficient items we can supply and install.
- Use local exhaust (vacuum) systems at source when using power tools to machine timber-based products containing hardwoods, this will minimise the release of harmful particulates in the air.
- As an end user of electrical and electronic equipment (EEE), if we have any EEE to be discarded, we will consider re-use, donation to charity or contact either the Producer of the EEE or Designated Collection Facility (DCF) to arrange for recovery and disposal as per the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013.
- We will be careful in use of consumables and reducing packaging wherever possible.

- As far as possible purchase products and services that do the least damage to the environment and encourage others to do the same e.g. use Chain of Custody certified suppliers for timber- based products*, substitution of solvent-based items with less harmful water based, careful use of consumables and reducing packaging wherever possible. For timber products, we have implemented and will maintain our Chain of Custody system.
- Assess the environmental impact of any new processes or products we intend to introduce in advance and of those within our Supply Chain.
- Ensure that all Employees and Sub-Contractors understand our Environmental Policy and conform to the high standards required.
- Address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned.
- Monitor our collective and individual performance for compliance and to seek improvement.
- Update our Environmental Policy annually in consultation with Staff, Associates and Customers on an annual basis or if any new circumstances apply.

* The UKTR and UK Forest Law Enforcement, Governance and Trade (FLEGT) Regulations, timber Supply Chains are regulated to ensure harvesting practices are legal, encourage sustainable harvesting practices and support global forest governance. Businesses trading in timber and timber products must take steps to ensure that they originate from legal sources.

Timber imported from Countries that have implemented voluntary partnership agreements (VPAs) with the UK - currently only Indonesia - must be accompanied by a FLEGT Licence.

This Statement is to confirm that we are compliant with the UKTR as a Trader under the definitions of the Legislation. As a Trader, we maintain records of all purchases and sales of timber products to ensure traceability.

The philosophy of “good environmental stewardship” is accepted and implemented from the Managing Director and throughout the workforce. To make this Policy effective all Employees within the Company need to understand the actions required of them.

The Director (signatory below) is responsible for monitoring the effectiveness of this Policy and taking any actions necessary to improve environmental performance.

Should the Company Management feel that improvement or remedial actions are necessary following a failure to comply with this Policy, the issue shall be dealt with and resolved as soon as practicable.

Instances of non-compliance or poor environmental practices shall be reported, investigated with appropriate corrective and preventative actions taken.

TRAINING

Training and development shall be carried out as and when required to meet the Company's business needs, with new Employees and Trainees receiving a full induction on Company Rules and Procedures, including this Policy and related arrangements.

Workplace Inductions will provide information and cover the specific rules for each workplace, this will include any arrangements for separation of waste, recycling and going through the CoSHH Assessments relevant to the workplace and tasks (including potential environmental hazards, spill clean-up/containment procedures and disposal considerations).

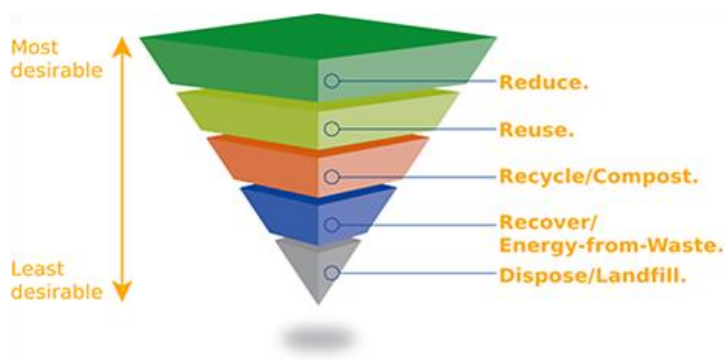
It is vital that every team member is aware of the content of this Policy and arrangements made as a result, linked to their respective role as a Manager, Supervisor or Worker. Records of the delivery of all forms of instructions given must be retained as proof of receipt. As a minimum, each Worker will receive instruction on:

- The importance of conformity with the Environmental Policy;
- The significant environmental aspects and related actual or potential impacts associated with their work activities and the environmental benefits of improved personal performance; and
- The potential consequences of departure from specified operating procedures.

SUSTAINABILITY, WASTE MANAGEMENT AND DISPOSAL

We shall utilise the following "Waste Reduction Hierarchy" towards environmental sustainability:

- ✓ **Reduce** - Amounts of waste going to landfill or becoming hazardous by careful ordering, efficient size of packages/containers, using all contents and environmentally friendly systems of work.
- ✓ **Reuse** - Items where current Legislation allows, buy quality sundries with longer lifespan, donate left over items to charitable groups if practicable.
- ✓ **Recycle** - Influence choice of recyclable products, use recycling facilities, solvent based products to be sealed in cans and as empty as possible, clean out water based containers, drying them so that they are fit to recycle.
- ✓ **Review** - Look at how we operate, monitoring levels of waste to seek opportunities to improve our environmental performance.



WASTE MANAGEMENT (ENVIRONMENTAL PROTECTION ACT (EPA) 1990)

Under the EPA we have a Duty of Care within the definitions of Waste Holders as a Waste Producer and a Waste Carrier of controlled waste. We will meet our responsibility to take all reasonable steps to ensure that when we transfer waste to another Waste Holder that the waste is managed correctly throughout its complete journey to disposal or recovery.

STORAGE OF WASTE

Waste must be stored securely and safely. Any waste awaiting removal must be stored in receptacles which are appropriate to the refuse composition and which are clearly marked as to the type of waste they contain. Waste storage areas must not be sited close to emergency escape and exit routes or drainage points.

Where Space Permits, Waste Should be Segregated as Follows:



The following waste must be segregated and cannot be disposed of in general or mixed waste containers:

Hazardous Waste: Oils, paints, chemicals, solvents, asbestos etc.

Electrical Waste: Electronic and electrical items, such as plant, catering equipment, IT equipment.

Plasterboard containing gypsum.

We must identify waste which poses a risk whilst in our workplaces such as broken glass or drug user items and ensure that it is properly protected prior to disposal to minimise the risk of injury.

It is our Policy to ensure that all waste produced is disposed of in accordance with the requirements of the Environmental Protection Act 1990 and the subsequent Regulations made under this act.

For site work away from our own premises, we hold a valid Waste Carrier's Licence (Reference: CBDU217008) to take away small amounts of waste in our vehicles, a copy of the Licence will be carried within each vehicle to show to anyone who wishes to see it. Larger amounts of waste will be disposed of using Licensed Waste Carriers with copies of the requisite Waste Transfer Notes held on file for auditing purposes.

NATURE CONSERVATION - (The Wildlife and Countryside Act 1981)

Before starting construction works, we will survey the proposed work area to identify any plants, animals and birds that might be impacted by our works. We will refer to and follow the appropriate Government Guidance should any potential issues be identified:

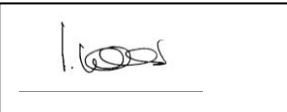
<https://www.gov.uk/guidance/construction-near-protected-areas-and-wildlife>

MANAGING COMPLIANCE AND REVIEWS

As part of our inspections and audits undertaken either at our premises and on site, we will review how our Policy and procedures are being implemented, identify and share good practices and take actions to address any areas where we may be falling short of our high expectations. The results of these inspections and audits will form part of the information that our Management will use to:

- a) Feed into progress discussions for specific projects (both during the project and as part of post-project review and;
- b) Monitor and review our Policies and Systems via discussions with our own workforce and our external Advisor (John Sneath of Site Assessment & Training Services (SATS) Ltd) who is an Associate Member of the Institute of Environmental Management and (via SATS Ltd) a member of the Birmingham, Health, Safety & Environment Association (BHSEA)).

Signed:



Ian Walker

Date: 28th February 2023

Title: Managing Director

On behalf of Woodcraft Joinery Ltd

Scheduled Date of Next Review of this Policy: by End of February 2024 Unless Required Earlier

ENVIRONMENTAL MANAGEMENT ARRANGEMENTS

RESPONSIBILITIES

Ian Walker as Managing Director, will have overall responsibility for implementing the Environmental Policy within the Company and to ensure co-ordination between work areas in delivering the Company's arrangements.

The Office Manager will have responsibility for related practical matters for the office area.

The Workshop Manager will have responsibility for related practical matters for the workshop area.

The Yard Manager will have responsibility for related practical matters for the yard area.

Site Managers will have responsibility for related practical matters for sites where we are in charge of the project.

Site Supervisors will have responsibility for related practical matters for our work elements on sites where we working to a Principal Contractor and for ensuring we comply with any site specific arrangements they put in place.

Timber Products

Under the UK Timber Regulations (UKTR), any person who, based in Great Britain and in the course of a commercial activity, sells or buys timber already placed on the GB market, is referred to in UKTR as a Trader and is required to meet obligations in respect of the traceability of timber.

As we are a Trader under the UKTR, records of the Operator or Trader who supplied the timber will be maintained and retained for a period of 5 years in case of inspection by the Office for Product Safety and Standards (OPSS) - this recording will also include whether the Operator/Trader has FSC/PEFC Certification. We will also record any Traders to whom we have supplied timber products. Records will be kept against the following Harmonised System (HS) codes:

HS CODE	PRODUCT DESCRIPTION
4403	Wood in the rough, whether or not stripped of bark or sapwood or roughly squared.
4407	Wood sawn or chipped lengthwise, sliced or peeled, whether or not planed, sanded or end-jointed of a thickness exceeding 6mm.
4408	Sheets for veneering (including those obtained by slicing laminated wood) for plywood or for other similar laminated wood and other wood, sawn lengthwise, sliced or peeled, whether or not planed, sanded, spliced or end-jointed of a thickness not exceeding 6mm.
4409	Wood (including strips and friezes for parquet flooring, not assembled) continuously shaped (tongued, grooved, rebated, chamfered, V-jointed, beaded, moulded, rounded or the like) along any of its edges, ends or faces, whether or not planed, sanded or end-jointed.
4410	Particle board, oriented strand board (OSB) and similar board (for example, waferboard) of wood or other ligneous materials, whether or not agglomerated with resins or other organic binding substances.
4411	Fibreboard of wood or other ligneous materials, whether or not bonded with resins or other organic substances.

4412	Plywood, veneered panels and similar laminated wood.
4413 00 00	Densified wood, in blocks, plates, strips or profile shapes.
4414 00	Wooden frames for paintings, photographs, mirrors or similar objects.
4415	Packing cases, boxes, crates, drums and similar packings of wood, cable drums of wood, pallets, box pallets and other load boards of wood, pallet collars of wood. <i>(NB: Records are not required for packing material used exclusively as packing material to support, protect or carry another product placed on the market).</i>
4418	Builders' joinery and carpentry of wood, including cellular wood panels, assembled flooring panels, shingles and shakes.
9403 30 9403 40 9403 50 00 9403 60 9403 90 30	Wooden furniture.
9406 00 20	Prefabricated buildings.

NB: Certain timber is exempt from the recording requirements of UKTR.

Exempt products include:

- Recycled timber: timber that has completed its lifecycle and would otherwise be disposed of as waste e.g. timber from buildings that are demolished;
- Printed books: newspaper, pictures and other products of the printed industry;
- Packaging: which is used exclusively as packing material to support, protect or carry another product placed on the market or is specially shaped or fitted to contain a specific article or set of articles for which they are intended;
- Tools: tool bodies, tool handles, broom or brush bodies and handles of wood;
- Seats.

WASTE MANAGEMENT

Definitions:

“Recovery” is any operation which has the main result of waste serving a useful purpose by replacing non-waste materials that would otherwise have been used to fulfil a particular function. An example is incineration for energy recovery - see Waste Incineration below.

“Preparing for re-use” is the operation or process of checking, cleaning or repairing products that have previously been discarded so that they can be re-used without any other pre-processing for example repairing furniture or electrical or electronic equipment which have been previously discarded by their Owners.

“Recycling” is any operation by which waste is reprocessed into products, materials or substances, whether for its original or other purposes.

“Disposal” is any operation which is not recovery (even where the operation has a secondary consequence of reclaiming substances or energy). An example is landfill.

WASTE INCINERATION

Wherever possible, where we have larger offcuts of timber material either in our workshop or from site, will retain these for re-use in other works.

Smaller items will be used as fuel for our Talbott T5/A - 150kw Incinerator which is used as part of our heating system. Various types of wood products are incinerated including treated wood, painted wood, panel products, MDF, plywood, offcuts, virgin timber etc.
EWC CODE: 17 02 01 - Wood Disposal.

We estimate that a total of approximately 10% of sheet material off cuts are incinerated and 10% of timber waste is incinerated.

NB: The incinerator has been confirmed as being an exempt appliance under the Clean Air Act 1993.

CARRIAGE OF WASTE/WASTE TRANSFER NOTE/WASTE CONSIGNMENT NOTE:

Any waste resulting from our site works will be returned to our premises under our Waste Carrier's Licence or transferred to another Licenced Carrier via a Duty of Care: Waste Transfer Note. Where waste is disposed of from our premises this will be via a Licenced Carrier via a Duty of Care: Waste Transfer Note.

The Workshop/Site Manager as applicable will ensure the removal of all hazardous waste is recorded on Hazardous Waste Consignment Notes.

These documents must be kept for a minimum of three years.

ELECTRICAL AND ELECTRONIC EQUIPMENT (EEE)

For any EEE to be discarded we will consider each item on the basis of condition and fit with alternative use in our business with the following hierarchy:

- Re-use;
- Donation to charity;
- Contact either the Producer of the EEE or Designated Collection Facility (DCF) to arrange for recovery and disposal**.

**The `Register of Producers` on the Environment Agency website, gives details of Producer Members of each Producer Compliance Scheme (PCS).

(<http://www.environment-agency.gov.uk/business/topics/waste/32086.aspx>).

MEASURES FOR THE CONTROL OF NOISE, VIBRATION AND DUST EMISSIONS

The control of noise, vibration and dust emissions will be considered in the planning of all activity at all times. Plant will not be started until 7.30 a.m. and construction activities on site will not exceed 65dB measured at a distance of 3.5m from the nearest façade of a property.

Noisy activities will be checked with a noise level meter as necessary to monitor levels which appear excessive. For dust the following steps are to be followed:

- Limit use of power tools where dust may cause nuisance;
- Minimise dust by dampening down with light water spray, sufficient to prevent airborne particles without leaving surface water;
- Use on tool dust extraction where available. All extraction equipment must be properly maintained;
- Ventilate and clean the area regularly, either dampen down with fine water spray or vacuum at source with type M or Type H machine.

DETAILS OF PRODUCTS CONTAINING ORGANIC SOLVENTS

The following solvents were used over the last 12 months:

Product	VOC Content	What the product is used for
Dulux Vinyl Matt Coating	20-30 g/l	Water based emulsion paint for painting/finishing joinery & furniture
Dulux Quick Dry Satin Varnish	10 g/l	Water based varnish for wood protection & gloss finish
Dulux Tinted Colour Sampler	"Low"	Used as a colour tester
Dulux Primer	300 g/l	Undercoat used to prepare surfaces for painting
Zinsser Bulls Eye 1-2-3	≤ 100 g/l	Water based primer/sealer & paint to cover stains
Dulux Satinwood	Max 92 g/l	White satin paint for painting joinery & furniture
Dulux Quick Dry White Undercoat	Max 30 g/l	White base coat to prepare surfaces for topcoat finish
Sayerlack Waterbased Top Coat AT99	37 g/l	Water based wood coating paint
Sayerlack Waterbased Lacquer ALF3198	37 g/l	Water based clear lacquer for finishing joinery
Sayerlack Primer	47 g/l	White base coat to prepare surfaces for topcoat finish
Morrells Fast Dry AC Lacquer	532-542 g/l	Lacquer for spray finishing of joinery & furniture
Morrells Fast Wood Stains	810 g/l	Wood stain for spray finishing/staining of joinery & furniture
Morrells Thinner	131 g/l	Thinner used to thin wood stains
Morrells Xerofire Clearcoat	475-485 g/l	Fire retardant clear topcoat for finishing joinery & furniture
Symphony Coatings AC Lacquer	534 g/l	Clear lacquer for spray finishing of joinery & furniture
Symphony Coatings Oak Spray Stain	819 g/l	Wood stain for spray finishing/staining of joinery & furniture
Sadolin Classic Wood Protection	399 g/l	Versatile wood stain for protection of wood products
Sikkens Cetol HLS Plus Stain	383 g/l	Versatile wood stain for protection of wood products

STORAGE OF MATERIALS

The following steps are to be taken when storing materials:

- We will always refer to the Supplier's Guidance for transportation, storage and use - particularly in terms of incompatibilities, containers to be used and fire risk - SEE MSDS AS ISSUED BY THE MANUFACTURER/SUPPLIER AND RELATED CoSHH ASSESSMENT.
- Store materials away from walkways and prevent access by others.
- Limit height and number of materials stored or stacked in one place.
- Avoid storage of large amounts of combustible materials as this could lead to increased risk of fire.
- Surround any fuel storage tanks with sufficient bunding for the volume stored.
- Have spill kits available and workers trained in their use.
- Notify the appropriate authorities in case of leakage into the environment, especially into watercourses.