

Harmonix

HARMONIX CONSTRUCTION LTD

Environmental Policy
April 2022

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Date: April 2022

PURPOSE

This policy applies to all areas and operations of Harmonix Construction Limited undertakings.

Harmonix Construction Limited's principal operations are undertaken within the construction industry for various clients. We recognise that our operations interact with the environment and are firmly committed to reducing adverse impacts and eliminating them where possible.

In particular, Harmonix Construction Limited will achieve this through our commitment to:

Comply with all relevant environmental legislation and regulations.

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

Every employee has an individual responsibility to help meet the requirements of this policy.

AIMS AND OBJECTIVES

The aims and objectives of Harmonix are to eliminate the impacts that the aspects of the company's undertakings have on the environment.

Where it is not possible to eliminate the impacts, we will endeavour to reduce or minimise them by the use of reduction, recycling, waste separation and other techniques.

Harmonix recognises that an essential management principle is that objectives and targets aim to be "S.M.A.R.T.E.R."

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

AIR

Harmonix will ensure through its maintenance and purchasing programme that site-mobile machinery used on its projects meets the emissions of gaseous and particulate pollutant levels outlined in various E.U. Directives and that continuous improvement is achieved.

Dust will be reduced as far as is practical by the enclosure of working areas, preventing migration outside the working area. Where and if possible filtered extraction will be used to collect dust produced by static machinery.

COMMUNICATION

Effective two-way communication between employees at all levels is seen by Harmonix as an important part of ensuring the protection of the environment. Harmonix will work with all persons affected by their undertakings to ensure that information on environmental aspects and impacts are shared.

Communication with employees will take various forms and employees are reminded that they may raise any health, safety or environment issue with any member of management in total confidence. Employees are actively encouraged to raise any concerns they may have in relation to environmental aspects.

CONTAMINATION

Where necessary, site investigations will be undertaken by the client prior to the commencement of works, with the results communicated by the Principal Contractors construction phase plan or by the CDM coordinators pre- construction information.

Should the details of a survey not be supplied and it is suspected that pollution is present at the commencement of works, the client or CDM coordinator will be contacted to arrange a decontamination operation or be asked to provide an adequate survey.

DISPOSAL OF CONCRETE ON CONSTRUCTION SITES

Where concrete or grout is used, it will be contained within a suitable barrier within the working area to prevent its escape and entering any watercourses or surface water drains. Concrete and grout products are highly alkaline and corrosive and can cause serious pollution and damage to the ground, watercourses, water wildlife, invertebrates and fish, as they are very sensitive to changes in pH levels. Concrete also contains chromium, which is potentially polluting not only to watercourses but also to groundwater.

Trucks, hoppers, mixers and concrete pumps that have contained concrete will be washed out in a contained area away from watercourses, surface water drains, storm water drains, grids and channels to prevent pollution. Where possible, store and reuse washout water.

Pollution Prevention

Concrete and cement mixing will be:

- Sited on an impermeable designated area
- At least 10m away from a watercourse or surface water drain, to reduce the risk of run-off entering a watercourse
- Surplus dry concrete, cement and grout will be used elsewhere on site if possible, or as inert rubble; if not, it will need to be disposed of off-site and transported using a registered waste carrier
- Equipment, batching and ready-mix lorry washing and cleaning will be washed out on site into a designated area that has been designed to contain wet concrete / wash waters
- Wherever possible, excess concrete will be sent back to the batching plant
- Wash waters will be stored to let them settle out and have re-circulation systems to reuse the water (e.g. for mixing and washing) to minimise the risk of pollution and reduce water use. Re-circulation systems include the use of sumps, specifically manufactured equipment, to a simple metal container. A lined and covered skip may be used for smaller sites providing it's in good condition (i.e. water tight) and solids frequently reused, recycled or removed and disposed of legally. (The site size and material amounts will determine facilities utilised).

Collect wash waters that cannot be reused to:

- Discharge to the foul sewer (permission will be gained from the local sewerage provider for this)
- Dispose off-site by a registered waste carrier
- Reuse the solids that settle out during storage otherwise they will be disposed of legally

Further Considerations

All cement bags will be sealed after use, stored appropriately to prevent leaks or dust (preferably in a waterproof building or storage container) and disposed of legally off-site, never buried or burned.

The provision of a contained wash-off area for tools will be provided.

Consideration will be given to the types of cement, concrete and grout ordered - e.g. use quick setting products in structures in or near watercourses.

Limiting the amount of materials ordered and consideration to the timing of deliveries.

ELECTRICAL AND ELECTRONIC EQUIPMENT

The Waste Electrical and Electronic (Amendment) Regulations 2013 (WEEE Regulations) introduced new responsibilities for businesses that use electrical and electronic equipment (EEE).

When disposing of any electrical waste Harmonix will comply with the requirements of our duty of care as detailed in the WEEE Regulations.

The duty of care has no time limit. Harmonix is specifically responsible for waste from production until we have transferred it to an authorised person.

As with the waste hierarchy, the primary objective of the WEEE Directive 28 is to prevent WEEE being produced in the first place. Where possible, measures should be taken to reduce the amount of WEEE produced. To this end Harmonix will choose electrical equipment which is proven to have greater longevity than comparable equipment, or replace parts or upgrade software of electrical equipment rather than discarding the whole appliance or unit.

ENERGY CONSERVATION

Increasing energy costs, coupled with both National and Governmental needs for energy conservation, has resulted in "Energy Management" being regarded as an important task in all of the work activities undertaken by Harmonix.

Harmonix recognises that energy efficient measures can be achieved through the correct selection of appropriate plant and equipment.

Energy saving requirements may also involve such things as ensuring a piece of plant has completed all necessary tasks before being withdrawn from a project as its return to site at a later date will result in poor logistic management and unnecessary additional emissions.

All persons involved at the planning or tendering stage of projects will fully consider all possible areas of energy reduction and conservation. Harmonix already engage in these considerations as part of BREEAM, and are looking to extend this to other aspects of projects.

ENVIRONMENTAL SUSTAINABILITY

Harmonix has the responsibility for ensuring on-going environmental performance, identification of environmental risks, recording and monitoring of impacts and implementing environmental sustainability measures.

The key themes we aim to action are:

- Design for minimum waste

- Minimise waste
- Minimise energy in construction use
- Reduce pollution
- Preserve and enhance biodiversity
- Conserve water resources
- Respect people and the local environment
- Monitor and report (i.e. use benchmarks)

Special consideration will be given to employing local contractors sourcing materials locally.

We expect employees and contractors to promote our commitment to environmental sustainability.

LOCAL COMMUNITY ENGAGEMENT

Harmonix accepts that, although the community may not have a direct relationship with our projects, it is nevertheless impacted by our construction activities and the resultant infrastructure.

If we receive any complaints about our activities, we will respond quickly and record any information so that we can improve our performance.

NOISE

Harmonix undertakes to work within the parameters outlined by the client or the Local Authority to restrict noisy activities to the time periods requested. All controls will be applied including a rigid maintenance regime, sufficient damping, lagging and other acoustic controls to ensure the reduction of noise.

Harmonix undertakes to act proactively, to ensure the elimination of unnecessary noise and to reduce noise that is produced, to an acceptable level. Whenever possible noise is reduced or eliminated by modifying machinery. We achieve this by maintaining equipment in good operation and encouraging our staff to report noisy equipment to our supervisors or managers when it requires attention.

Best Available Technique Not Entailing Excessive Cost (BATNEEC) will be used to prevent the effect of noise to the limit reasonably practicable having regard to the local conditions and circumstances, to the current state of technical knowledge and to the financial implications.

We achieve a reduction in noise from our vehicles by:

- Turning off engines when they are not in use
- Checking the brakes are properly adjusted
- Not revving the engine unnecessarily
- Only using the horn in emergencies
- Replacing exhaust systems as soon as they become noisy

- Replacing vehicles with electric or gas-powered alternatives
- Maintaining vehicles in good operation
- Encouraging our staff to report unusually high levels of noise to our supervisors

We ensure that noise does not cause a nuisance to the community surrounding the place of business or site on which we are working.

OFFICE WASTE

Through careful and efficient office management and the implementation of a quality system, the amount of waste created is kept to an absolute minimum. Harmonix is also promoting the recycling of office waste wherever possible.

This waste reduction is achieved through the use of recycled copy paper, envelopes, the keeping of "hard copies" of information to a minimum and using cups and cutlery etc. that are not of the disposable plastic type.

The use of environmentally friendly cleaning agents is insisted upon when purchased and assurance gained to ensure they do not contain any illegal phosphates or Chlorofluorocarbon (CFC) propellants.

Electrical energy is conserved by the use of high efficiency, fluorescent lighting which is switched off in rooms which are not in use. Natural energy used in heating systems is conserved by regular maintenance, servicing, and individual thermostatic controls.

Employees are instructed to avoid printing documents where possible and to communicate via emails in the first instance rather than with letters.

PREVENTING FUEL ENTERING ADJACENT WATERCOURSES AND DRAINAGE SYSTEMS

The risk of spillage is at its greatest during refuelling of plant. Harmonix enacts the following precautions to prevent fuel spillage entering watercourses:

- Where possible, we refuel mobile plant in a designated area, preferably on an impermeable surface and away from any drains or watercourses
- Keep a spill kit available
- Never leave a vehicle unattended during refuelling, or allow our staff to jam open a delivery valve
- Check hoses and valves regularly for signs of wear and ensure that they are turned off and securely locked when not in use
- Diesel pumps and similar equipment are placed on drip trays to collect minor spillages. These will be checked regularly, and any accumulated oil is removed for disposal
- In the event of a spillage on site, the material shall be contained (using an absorbent material such as sand or soil or commercially available booms), and the Environment Agency will be notified immediately.

PREVENTION OF POLLUTION FROM PLANT AND MACHINERY

In order to prevent materials leaking from static plant, such as company vans, contaminating the ground and being washed into the drainage system, Harmonix places static plant on drip trays or bunded areas.

Facilities for washing plant and equipment contaminated with concrete or other chemicals will be provided. Wash water from the facilities will be managed so as to prevent pollution of surface water and groundwater.

Construction site runoff from plant and machinery can cause serious pollution if appropriate management systems for controlling discharges are not adequately followed.

In our efforts to reduce our carbon footprint when replacing plant, we will gradually introduce 'green plant' when they become available for purchase or hire. We will also encourage our employees to use public transport, cycle to work and share cars wherever possible.

PROTECTION STRATEGY FOR WILDLIFE, TREES, WATERCOURSES AND LANDSCAPE FEATURES

It is important to Harmonix as a company to minimise the impact of their projects on local wildlife.

Harmonix undertakes an environmental appraisal, which properly accounts for biodiversity, as an element of all of our development proposals; regardless of the statutory necessity to do so. Through BREEAM, we always evaluate our abilities to enhance the local ecology through our works.

Our key considerations and actions include:

- To use materials with similar pH values so as not to adversely affect adjoining habitats by leaching
- To try to source our materials locally, especially if they help to support the ecology and habitats of the region. This will also reduce our travel whilst supporting the local economy

Harmonix conducts our activities and operations to reflect best environmental practice and implement an environmental management system to pursue sustainability, continual improvement and the prevention of pollution.

In particular, we:

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

All of our construction activities are completed in accordance with the requirements of The Conservation of Habitats and Species Regulations 2010, Natural Environment and Rural Communities Act 2006 and The Wildlife and Countryside (Amendment) Act 1991.

RECYCLING

Harmonix, as a company, is committed to minimising all waste in its operations and works. Where waste may be produced, every effort will be made to recycle such materials, i.e. metals, etc.

Harmonix makes full use of any recycling facilities provided by the Supplier, Manufacturer, Principal Contractor or Local Authority. We also ensure our waste providers operate the maximum amount of waste recycling as possible.

REMOVAL OF TREES WITH PRESERVATION ORDER

With certain exceptions, it is illegal to fell trees in Great Britain without prior Forestry Commission (FC) approval. All cases of suspected illegal felling are investigated, and prosecution may ensue. FC and The Department of Agriculture and Rural Development (DARD) Forest Service policy is that areas felled will be replanted or naturally regenerated, except where felling is allowed for environmental improvement or to enable development authorised under planning regulations.

A Tree Preservation Order (TPO) is made by the Local Planning Authority (LPA) usually a local council to protect specific trees and woodland from deliberate damage and destruction. TPO's prevent the felling, topping, lopping or uprooting of trees without permission from the planning authority.

Harmonix accepts that, if we should deliberately destroy a tree, or damage it in a manner likely to destroy it; we could be fined up to £20,000 if convicted in the magistrate's court. We are also aware that we will normally have to plant a replacement tree if the tree was cut down or destroyed.

Harmonix seeks permission from the Forestry Commission to fell any growing trees that may be present on any of our sites. We shall not begin felling until we have been issued with a licence or received other permission from the Forestry Commission.

An application form will be obtained from the appropriate Forestry Commission office. It shall be completed and submitted for approval, along with two signed copies of a map of the area showing the location of the trees that we wish to fell. It is estimated that a licence shall be issued within 10 weeks from the receipt of application.

If we are unsure as to whether or not a tree is covered by a protection order, we shall visit the local planning authority's offices to inspect the details of TPOs in operation within the surrounding area.

SPOIL

Harmonix believes that sustainable waste management is achievable by committing ourselves to a waste strategy that is based on the following waste hierarchy:

Reduce – We shall endeavour to only order the amount of materials that we actually need

Re-use – We shall endeavour to choose materials that can be broken down in component parts at the end of their life and re-used

Recovery – This includes recycling, composting, and waste-to-energy. Materials will be separated into component parts, ready for re-use.

STORAGE AND USE OF CHEMICALS, FUEL/OIL AND OTHER CONSTRUCTION MATERIAL

We attempt to reduce or eliminate the use of ozone depleting chemicals (CFC, Halon, 1.1.1 Trichloroethane, HCFC).

Chemicals will be stored in secure designated, (bunded where necessary) storage areas and in accordance with the appropriate regulatory requirements, including the Control of Substances Hazardous to Health (Amendment) Regulations 2004 and The Control of Pollution (Oil Storage) (England) Regulations 2001. Refuelling of vehicles and machinery will be undertaken in accordance with a specified procedure that may include the designation of refuelling areas. Spill contingency plans will be drawn up and included in the procedures. Stockpiles of dry materials will be stored in locations that prevent contamination of surface waters.

Oil shall be stored in a container which is of sufficient strength and structural integrity to ensure that it is unlikely to burst or leak in its ordinary use.

The container shall be sustained within a secondary confinement system which satisfies the following requirements:

- It will have a capacity of 110% of the container's storage capacity or, if there is more than one container within the system, of not less than 110% of the largest container's storage capacity or 25% of their aggregate storage capacity, whichever is the greater
- It will be positioned so as to minimise any risk of damage by impact so far as is reasonably practicable
- Its base and walls shall be impermeable to water and oil
- Its base and walls shall not be penetrated by any valve, pipe or other opening which is used for draining the system
- If any fill pipe, or draw off pipe, penetrates its base or any of its walls, the junction of the pipe with the base or walls shall be adequately sealed to prevent oil escaping from the system

TRAINING

All employees will be given training in general environmental awareness, task specific procedures and methods that can be used to reduce or minimise the impact to the environment by the undertakings of the company.

WASTE

Harmonix takes all such measures as are reasonable in the circumstances to apply The Waste Hierarchy approach to prevent waste, and to apply the hierarchy as a priority order when transferring waste to another person, as outlined below.



Harmonix recognises its Duty of Care under The Waste (England and Wales) Regulations 2014 and other associated statutory provisions. The regulations require that those companies who carry their own waste on a 'normal and regular' basis are to be registered. The regulations set two tiers of registration and as a construction company transporting construction waste Harmonix Construction Limited have registered as an upper tier carrier and have paid the required fee to appear on the Environmental Agency Public Register. We recognise that registering as a waste carrier also helps the Environmental Agency to clamp down on fly-tipping by illegal operators who harm human health and the environment whilst also undercutting legitimate businesses.

The duty of care with regards to waste aims to protect the environment and human health by making sure that waste is handled safely and only passed to companies authorised to receive it. When Harmonix Construction Limited passes on its waste to another carrier we will ensure good practice is followed i.e.:

- We will check that the company or person we are transferring the waste to is properly authorised to accept it. E.g. we will check they are a registered waste carrier
- We will ensure the waste is safely contained and is not able to escape control
- We will ensure the correct documentation is completed for each transfer of waste and that it correctly describes the waste
- We will minimise the environmental impact of waste by prioritising waste prevention, re-use, recycling and recovery over disposal. This is known as applying the 'waste hierarchy'.

Harmonix Construction Limited aims to minimise any adverse impact on the environment from its policies and working practices. To that end we will plan to reduce the amount of waste we generate and pursue methods of disposal in line with this objective. These will include recycling, in contrast for example to collection and incineration.

Hazardous waste

Hazardous waste is defined by the List of Wastes/European Waste Catalogue where wastes considered to be hazardous are marked with an asterisk. It includes things that you would naturally expect to be hazardous – such as certain sludge's or chemical waste from refining processes but it also includes waste that arises in everyday business activity including construction and demolition. These include:

- Fluorescent tubes (see EA Guidance Note)
- Cathode ray tube televisions and monitors
- LCD screens and laptops
- CFC containing fridges and freezers
- Certain types of batteries
- Mineral oil or oil-soaked rags and cleaners

Business producing this type of waste cannot put it in the general waste bin and must have it separately collected under Hazardous Waste consignment procedures. We note that if we have a site that generates >500kgs of hazardous waste per year, we will register as a hazardous waste producer to get a premises code for use on consignment notes.

WATER

The employees of Harmonix are aware of the importance to protect the integrity of groundwater, rivers, lakes and other elements of the water system. The company recognises duties under the Control of Pollution (Oil Storage) (England) Regulations 2001, The Groundwater (England and Wales) Regulations 2009, Anti-Pollution Works Regulations 1999 and The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009.

In particular, Section 85 of The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009 which states that, 'no person shall cause or knowingly permit any poisonous, noxious or toxic material or solid waste to enter a 'controlled water'. 'Causing' means not only deliberately releasing any polluting matter but also causing the pollution accidentally, by being the operator of a plant or process.

Where necessary to prevent water pollution, drain covers, self-contained water systems and other methods are used. Detergents and solvents are to be as environmentally friendly as possible and where not possible Harmonix ensures that the migration of substances does not adversely impact on the environment.

MONITORING OF THE POLICY

Employees are encouraged to bring to the attention of the Director and Procurement & Sustainability Manager, areas which in their opinion this policy appears inadequate.

This Policy and Arrangements will be reviewed on at least an annual basis, provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

If you have any questions, comments or suggestions related to this policy, please get in contact with Harmonix's Procurement and Sustainability Manager Luke White at luke@harmonixconstruction.com.

Written in conjunction with M.E.L (Health & Safety) Consultants Ltd. and has been developed using best practice pollution prevention policies and procedures on-site in accordance with Working at construction and demolition sites: PPG6, Pollution Prevention Guidelines.

April 2022. To be revised no later than April 2023.

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