



Environmental & Sustainability Policy

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Grove Electrical.

Environmental Policy

Grove Electrical. having recognized responsibilities for environmental matters, place a particularly high priority on environmental affairs, with regard to the Company operations and the services offered to customers. The Company operates a policy of effecting continual improvement and change in accordance with developing knowledge and changing environmental requirements.

Grove Electrical. employees are aware of the environmental sensitivity of the business sector, in which the Company operates and seek to continually develop the Company's environmental compliance. The following specific objectives form the basis of the Company Policy.

Objectives:

For each contract undertaken by Grove Electrical produce a plan for the reduction, reuse and recycling of waste.

All the Company's operations must be carried out with due regard to the appropriate and relevant legal requirements.

The Company will plan carefully its works so as to prevent pollution and minimize environmental disturbance as a result of our activities.

The Company will continue to make available resources to ensure that suppliers and customers are made fully aware of their environmental and legislative responsibilities, with regard to the provision of services in association with asbestos removal.

The Company will only use disposal facilities where the level of operations control and environmental compliance is deemed to be of a suitable level and represents responsible management.

The Company will always seek to use wherever possible, materials from renewable sources and recycled or recyclable materials.

The Company will ensure that vehicles and equipment used are well maintained, clean and are always operated within the legal limits, taking advantage, wherever possible, of engineering modifications to reduce pollution and emissions and to save unnecessary consumption of energy.

The Company will take whatever measures may be necessary to ensure that the collection, transport and disposal facilities, which it utilizes, are not and do not become hazardous to public health or the environment.

The Company will avoid the wastage of materials, water and energy by paying careful attention to their use.

The Company co-operates with, and assists to the best of its ability, officers of the Environment Agencies in the exercise of their duties.

The Company requires its staff to advise senior management of any concerns they have regarding poor practice by Waste Disposal contractors, or about any acts, which might be detrimental to the environment or the interests of the industry.

The Company will apply continual improvement by reviewing performance against targets and by reviewing objectives.

Signed: *Vince Newcome*

Date: 01/06/2023

Vince Newcome
Managing Director
Grove Electrical

ENVIRONMENTAL MANAGEMENT

PART ONE

DUTIES AND RESPONSIBILITIES

- A. At Grove Electrical, we recognise that all business activities impact on the environment through the consumption of resources and the generation of pollution and waste.
- B. We are committed to reducing the impact of our actions and to assisting our clients to achieve their environmental aims. To fulfil this, we have taken the following steps;
- we have a Company Environmental Policy;
 - we operate according to a set of Environmental Procedures;
 - we use presentations, training and discussion to increase our staff's awareness of Environmental Issues;
 - we operate the best environmental practices and procedures which have been integrated into the company quality and management systems.

ENVIRONMENTAL RESPONSIBILITIES

A. Managing Director

The Managing Director of the company has the overall responsibility for all Health, Safety and Environmental matters within the Company.

B. Supervisors

Each Supervisor is responsible for the implementation and daily control of the environmental management system. They are to ensure that all persons in their areas of responsibility, including any sub-contractors, fully adhere to the Environmental Policy and management system.

C. The General Manager

The General Manager is responsible to the Managing Director who has the overall responsibility for all Health, Safety and the Environmental matters within the Company. The General Manager will ensure through his activities that environmental hazards and procedures are addressed both at office and site locations. In particular, he is responsible for;

- Ensuring that best environmental options are employed where practical;
- investigate and analyse individual environmental accidents or incidents, as required, and making recommendations for improvements and the monitoring of any remedial actions taken;
- raising the environmental awareness of all employees;
- provision of advice on all aspects of the environment, including environmental auditing;
- identification of training needs;
- undertake environmental reviews of the client's premises, when requested to do so;
- providing environmental advice

D. Other Employees

In addition to the allocated duties listed above, all employees are expected to behave in an environmentally responsible manner and operate to the best environmental options whilst carrying out their day-to-day tasks.

ENVIRONMENTAL MANAGEMENT

PART TWO

PROCEDURES

- A. At Grove Electrical, we recognise that all business activities impact the environment through the consumption of resources and the generation of pollution and waste.
- B. We are committed to reducing the impact of our actions and to assisting our clients to achieve their environmental aims. To fulfil this, we have taken the following steps:
- We have a Company Environmental Policy;
 - We operate according to a set of Environmental Procedures;
 - We use presentations, training and discussion to increase our staff's awareness of environmental issues;
 - We operate the best environmental practices and procedures which have been integrated into the company quality and general management systems.
 - We audit annually for environmental compliance.

ENVIRONMENTAL RESPONSIBILITIES

- A. The General Manager is responsible for keeping employees informed about relevant legislation, for the provision of advice on the completion of environmental reviews at the client's premises and auditing for their environmental impacts, and to provide an information service.
- B. The General Manager works in conjunction with the Managing Director in support of all our operations and staff.
- C. Environmental matters are fed back to the General Manager for comment or action on a regular basis. The General Manager produces a written report for the Managing Director on a quarterly basis that addresses Health, Safety, Welfare and Environmental matters and any changes to legislation. In addition, all employees are expected to operate to the best environmental procedures and fully adhere to their responsibilities under their duty of care.

LEGISLATION

The principal legislation which applies to the activities of Grove Electrical are:

- A. Solids and Hazardous Substances
- Control of Pollution (special wastes) Regulations 1980;
 - Control of Pollution (Amendment) Act 1989;
 - Environmental Protection Act 1990;
 - Environmental Protection (Duty of Care) Regulations 1991;
 - Control of Substances Hazardous to Health Regulations 1994;
 - Code of Practice on "Waste Management "Duty of Care";
 - Waste and Containment Land (Northern Ireland) Order 1996;

- Local Government (Northern Ireland) Order 1994;
- Special Waste Regulations 1996.

B. Air Pollution

- Control of Substances Hazardous to Health Regulations 1994;
- Health and Safety at Work Act 1974;
- Environmental Protection Act 1990;
- Environmental Protection (Prescribed Processes and Substances) Regulations 1991;
- Environmental Protection (Applications, Appeals and Registers) Regulations 1991;
- EC Regulation 3093/94 on the Control of Ozone Depleting Substances – regarding the phase-out of CFCs and HCFCs, reclamation of refrigerants and leak detection;
- Clean Air act 1993;
- Control of Pollution Act 1990 – Section 58 – not repealed in Scotland;
- Alkali etc. Works (Registration) Order 1906 – still in force in Northern Ireland;

C. Water Pollution

- Water Resources Act 1991;
- Trade Effluents (Processes and Substances) Regulations 1989;
- Control of Substances Hazardous to Health Regulations 1994.

D. Toxic Substances

- Control of Pollution Act 1974;
- Environmental Protection Act 1990;
- Environmental Protection (Control of Injurious Substances) Regulations 1991;
- Control of Substances Hazardous to Health Regulations 1994.

E. Noise

- Control of Pollution Act 1974;
- Environmental Protection Act 1990 – Part 3.

F. Statutory Nuisances

- Environmental Protection Act 1990 – Part 3;
- Statutory Nuisance (Appeals) Regulations 1990;
- Public Health (Scotland) Act 1997 – Section 16.

PROCEDURES

- A. Environmental issues are fundamental to our core business of building service maintenance and through a Planned Preventative Maintenance (PPM) programme we ensure that plant equipment and systems are efficiently run, environmental damaging impacts are controlled and systems breakdowns are kept to the minimum.
- B. Procedures have been developed to reduce the environmental impacts of the maintenance tasks, which are carried out or arise from the operation of our branch offices and vehicle fleet.

ENERGY MANAGEMENT

- A. All of our operatives remain alert for areas where the efficiency of lighting, heating and hot water systems, air conditioning and controls can be improved.
- B. Within the office environment, good housekeeping and waste management practices are followed.

FIRE EXTINGUISHING SYSTEMS

- A. Like CFCs and HCFCs used in refrigeration, halons, which are used to extinguish fires, also damage the ozone layer. Their production and import by EC member states were banned from 1 January 1994.
- B. Where halon total flooding fire protection systems are installed, the Company requires that sub-contractors follow the procedures specified in BS 6535 with regard to minimising halon emissions when filling, emptying or decommissioning total flooding systems.

LIGHTING

- A. The Company recognises the harm that can result, both to the environment and to operatives, from uncontrolled disposal of expired lamps. We ensure that all lamps are either transported whole to suitable licensed waste facilities or collected together and crushed prior to removal to a disposal site. In the latter case, Special Waste is created.
- B. We are aware of initiatives to recycle fluorescent tubes and once we feel this is a viable option for our clients, we will advise them accordingly.

AIR QUALITY

- A. Indoor air quality can have a significant impact on the health of a buildings occupants and it is one of the factors which is believed to contribute to Sick Building Syndrome (SBS).
- B. We are aware of the requirements for ventilation in the workplace contained within the Workplace (Health, Safety and Welfare) Regulations 1992 and the associated Approved Code of Practice and we are able to advise our clients with respect to ventilation system hygiene inspection and cleaning.

WASTE MANAGEMENT

It is our policy that all the work undertaken by Grove Electrical. and our appointed sub-contractors complies with the client's requirements with respect to the disposal of waste, in addition, to meet our obligations under Section 34 of the Environmental Protection Act 1990.

A. Preventing the Escape of Waste

All waste that is the property of Grove Electrical will be suitably packaged to prevent its escape of leakage whilst on the site, in transit or storage.

Prior to any movement of waste it will be physically checked to ensure that it does not contain any items of special wastes.

B. Transfer to an Authorised Person

The company will ensure that waste is only transferred to registered authorised persons, i.e.

- a waste collection authority;
- a holder of a waste management licence or someone who is exempt from registration;
- a registered carrier of controlled waste or someone who is exempt from registration.

Grove Electrical is registered as Carriers of Controlled Waste under the Control of Pollution (Amendment) Act 1989 and the Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991. The registration is with the Environmental Agency.

Where we use sub-contractors to remove waste from a site rather than removing it directly ourselves, we will require them to provide details of their registration as a carrier by showing a representative of Grove Electrical the certificate of registration or an official copy of the certificate (issued by the Waste Regulation Authority). This information will be noted down and forwarded to the client if required.

C. Providing a Description of the Waste

An accurate, written description of the waste will be provided to be transferred with the waste at each stage. The description will indicate the quantity of waste consigned and will describe the material in sufficient detail to enable subsequent holders to handle it in an appropriate manner. Generally, the description will be combined with the transfer note. The description will be kept for at least 2 years.

D. Special Wastes

In order to be special, the waste must be a Controlled waste and cannot be a household waste, with the exception of asbestos, and wastes from laboratories and hospitals. A waste is special if it contains any of the fourteen hazardous properties listed below:

Explosive, oxidising, highly flammable or flammable, irritant, harmful, toxic, carcinogenic, corrosive, infections, toxic for reproduction (teratogenic), mutagenic, exotoxic, releases toxic gases in contact with water, air or acid.

If the answer is “yes” the waste is special.

If the waste is not featured above it is a prescription-only medicine or does it have a flashpoint below 21°C, if so, it is also special waste.

E. Record Keeping

On the transfer of waste, both the Consignor (i.e. Grove Electrical) and transferee will complete and sign the transfer note.

The transfer note must contain:

- Identification of the waste and how it is packed (its quantity, whether it is loose or in a container, the type of container) and the place and time of transfer;
- The name and address of the transferor and the transferee;
- An indication that the transferor is the producer of the waste;
- If the transferee is authorised for transport purposes, details of which of these purposes apply;
- The category of authorised person that the transferee (and the transferor, where applicable) comes under, or which exemption applies, and why they are exempt.

At each stage of the transfer of a consignment between waste holders, a new transfer note will be required.

As the consignor, we will keep the written description of the waste and the transfer note for a minimum of 2 years. (The transferee should similarly retain their copies.)

Grove Electrical will only use disposal sites that are licensed. Periodically checks will be made by a Grove Electrical representative to verify that the waste disposal sites used by our sub-contractors are licensed to accept the type of waste being transferred.

RECYCLING

Grove Electrical has a policy of using recycled paper and where practical packaging. This policy reduces the number of raw materials consumed, and assists in creating a market for materials with recycled content.

HAZARDS

- A. In the course of our activities, we may handle hazardous materials, for example, chemicals and controlled and special wastes. All employees are made aware through training and instructions about the hazards and risks involved with the storage, transportation, use and disposal of potentially hazardous substances; refresher training is carried out on an annual basis. The company has a centralised COSHH database and assessment procedure.
- B. If asbestos is identified or suspected, it is Company policy to notify the client to request that an asbestos survey be completed, by suitably competent and licensed persons, to identify the type of asbestos present, if any, and whether or not it poses a risk to the health and safety of our employees, or others who could be affected.
- C. If we are required to dispose of any Special Wastes, it will be the duty of the client to initiate the special waste notification procedure with the Environmental Agency, unless there are specific contract terms have been agreed, then we will ensure that the consignment note procedures are adhered to and that the disposal site is licensed to receive the type of special waste for disposal, in accordance with the Special Waste Regulations 1996 and its "duty of care" under the EPA 1990.

VEHICLES

Grove Electrical operates a policy of using a diesel engine fleet, although we are assessing this decision in the light of scientific evidence that indicates that diesel vehicles are no longer regarded as significantly better for the environment than petrol engine cars. However, more recent research suggests that non-leaded petrol is also hazardous to the environment because of the amount of toxic substances it contains. Clearly, it is difficult to trade-off benefits in one area with disadvantages in another. For the moment, the Company will continue to operate its diesel vehicle fleet. To reduce environmental impacts we ensure that all our vehicles are serviced regularly and maintained in good running order.

NOISE

The activities of the Company do not normally involve the use of the heavy plant or equipment which gives rise to significant noise levels. Where our activities do involve the use of plant equipment or power tools which could give rise to significant noise, we will endeavour to reduce that noise to the lowest possible level.

PURCHASING

Grove Electrical has adopted a strategy to make use of our bulk purchasing to reduce costs and to use suppliers who have been vetted for their quality and environmental performance.

STAFF AWARENESS AND TRAINING

- A. We believe that all Grove Electrical employees and appointed sub-contractors have a good understanding of environmental issues and an awareness of the importance of their work with respect to the environment. Good environmental practices and considerations are being incorporated into everyday tasks.
- B. We ensure that all personnel are suitably qualified to carry out their tasks when there is a need to protect the environment or the health of our employees and others who could be affected.
- C. Environmental awareness training forms a part of our induction process.

REVIEW AND MONITORING

To review and monitor our performance in meeting the requirements and objectives of our Environmental Policy we undertake the following actions;

- Review of our Reduction, Reuse & Recycling Of Waste document during the construction phase and upon completion
- Daily monitoring of our sites by the appointed site manager
- Review of environmental controls and their effectiveness by the project manager at regular intervals during the construction phase

ARRANGEMENTS FOR EMERGENCIES, INCIDENTS AND COMPLAINTS

Environmental emergencies and incidents will be responded to as set out in the site-specific arrangements detailed in the Construction Phase Plan for each individual construction project. An investigation of the emergency/incident will be completed by an appointed member of our management team to determine the cause and develop an action plan to prevent further occurrences.

All chemicals and substances used on-site have been subject to a COSHH assessment that details the emergency procedures to be following in case of spillages, accidental release or fire. All complaints will be investigated and followed up by an appointed member of our management team.

Appendix 1

Best Practice Grove Electrical

1. Dust and Emissions Control Measures

Grove Electrical will ensure that all on-site contractors follow BPM at all times to minimise dust and emissions. All appropriate measures will be included in the method statement.

1.1 Site Preparation

- Machinery, fuel and chemical storage and dust-generating activities should not be located to the boundary of the plot;
- Erect effective barriers around dusty activities or the site boundary.

1.2 Haulage Roads

1.2.1 Surface of Roads

Unpaved haul routes can account for a significant proportion of fugitive dust emissions, especially in dry or windy conditions, when the generation of dust through vehicles movements is exacerbated. It is recommended that to comply with good practice Grove Electrical will ensure that hard surfaces are used for haul routes, even if routes are temporary.

1.2.2 Damping Down

Grove Electrical will implement the washing or damping down of haul routes.

- Use agreed on cleaning methods on all roads during periods of dry weather;
- Provide hardstanding areas for vehicles and regularly inspect and clean these areas.

1.2.3 Vehicles

Grove Electrical will carry out the following controls to reduce dust and particulates associated with vehicles – such as exhaust emissions, the contact of tyres on the road surface or dust blowing from materials carried.

- All vehicles should switch off engines – no-idling;
- Clean or wash all vehicles effectively before they leave the site if there is a risk of affecting nearby roads;
- All loads entering and leaving the site to be covered.

1.3 Site Entrances and Exits

Grove Electrical will employ the following control measures to help prevent dust being spread outside the site boundary by site vehicles at entrances and exits.

- Clean or wash all vehicles effectively before they leave the site if there is a risk of affecting nearby roads.

1.4 Excavations

Grove Electrical will minimise dust disturbance as much as possible by employing the following measures;

- All dusty activities will be damped down, especially in dry weather;
- Earthworks temporarily covered if possible;
- Minimise drop heights to control the fall of materials.

1.5 Stockpiles and Storage Mounds

Grove Electrical will minimise the use of stockpiles on-site wherever possible;

- Make sure that stockpiles exist for the shortest possible time;
- Stockpiles or mounds kept away from the site boundary;
- Wherever possible, enclose stockpiles or keep them tightly sheeted;
- Where possible re-use hardcore material.

1.6 Cutting, Grinding and Sawing

When materials, such as concrete slabs or bricks are cut with a power tool without extraction or suppression, a second worker will pour water from a plastic bottle over the material as it is being cut.

- All equipment will use water suppressant or suitable local exhaust ventilation systems

1.7 Chutes and Skips

- Skips to be covered;
- Minimise drop heights;
- Regularly damp down surfaces with water.

1.8 Scabbling

- Pre-wash work surfaces;
- Screen off work area;
- Vacuum up all dusty residue rather than sweeping away.

1.9 Waste Disposal/Burning

Taking into account the Clean Air Act 1993 and nuisance legislation (the EPA), best practice recommends that:

- No burning of any materials is permitted on site;
- All excess material should not be wasted but used or safely removed from the site according to the appropriate legislation.

1.10 Dealing with Spillages

- Use bunded areas wherever practicable;
- Regularly inspect the area for spillages;
- Have spillage kits ready;
- Clean spillages using agreed wet handling methods;
- Vacuum or sweep regularly to prevent the build-up of fine waste dust material, which is spilt on the site and is designated as waste no longer fit for use should be dealt with in accordance with the Waste Management Licensing Regulations (WMLR) 1994.

1.11 Demolition Activities

- Tarmac is broken up using an excavator with hydraulic attachment;
- Waste mechanically removed to skip to reduce the need to break it into smaller pieces;
- Materials removed from the site as soon as possible.

1.12 Hazardous and Contaminated Material

Grove Electrical will complete COSHH Assessments for all hazardous materials on-site or brought to the site.

2. Noise, Vibration and Pollution

2.1 Noise and Vibration Control Measures

- Provision of lined and sealed acoustic covers for equipment;
- Turning off plant and equipment when not in use;
- All plant being intermittently used shall be throttled back to the minimum at every opportunity;
- Fitting of silencers to all plant, machinery and vehicles;
- The hoarding will be increased in height and possibly altered in form to enhance acoustic performance for specific locations;
- Hours of construction work to be limited to between 0800-1800 weekdays and 0900-1400 on Saturday's; no noisy works should be carried out on Sundays and Bank Holidays;
- Foundations will be traditional strip footings;
- Drop heights of materials from lorries and other plant will be kept to a minimum;
- Materials will be handled with care e.g. material such as scaffolding and steelwork will be placed rather than dropped;
- Ancillary plant such as generators, compressors and pumps liable to create noise and/or vibration whilst in operation will, as far as reasonably practicable, be located away from sensitive receptors;
- The use of barriers to absorb and/or deflect noise away from noise-sensitive areas will be employed where required and reasonably practicable;

- Where reasonably practicable, fixed items of construction plant should be electrically powered in preference to diesel or petrol driven.

2.2 Pollution Control Measures

- It will be Grove Electrical.'s objective to as far as is reasonably practicable, to control and limit emissions to the atmosphere in terms of gaseous and particulate pollutants from vehicles and plant used on the Application Site and dust from construction activities;
- Site waste management plan to be implemented;
- Priority will be to reduce the amount of waste going to landfill;
- Maximise the use of recycling facilities and opportunities to reuse materials;
- Turning off plant and equipment when not in use;
- All plant being intermittently used shall be throttled back to the minimum at every opportunity;
- Plant will be well maintained, with routine servicing of plant and vehicles to be completed in accordance with the manufacturer's recommendations and records maintained for the work undertaken;
- Grove Electrical will seek to avoid the use of diesel or petrol powered generators and use mains electricity or battery-powered equipment at the earliest opportunity;
- All hazardous substances (including liquids and solids) will be stored within impermeable, bunded areas, to remove the risk of migration to groundwater or a nearby watercourse to the satisfaction of the Environment Agency. The measures proposed will assist in avoiding or minimising the potential for contaminants and suspended solids to migrate to surface and groundwater, reduce localised flood risk, and protect water quality and the ecosystems the water resources support;
- Use of drip trays to collect leaks from diesel pumps or from standing plant;
- The provision of spill containment equipment such as absorbent material on site;
- The provision of wheel wash facilities should be provided for vehicles moving to and from the Application Site at all entry and exit points;
- The reseeded of cleared land as soon as practicable, to minimise exposed land and the entrainment of sediment by overland flow, and this can be managed by ensuring construction plant/ materials are stored on hardstanding surfaces where possible. Where this is unavoidable, the Contractor will ensure any compacted soil is loosened as soon as possible following completion of the works.

3. Site Monitoring

Grove Electrical will monitor the work activities to ensure the following;

- Employ best-practice methods at all times;
- Take into account the impact of air quality and dust on occupational standards to minimise worker exposure;
- Keep an accurate log of complaints from the client and/or public.

Appendix 2

Reduction, Reuse & Recycling of Waste

| Waste Materials | Waste Minimisation Opportunities | On-Site Reuse/Recycling/Recovery | Off-Site Reuse/Recycling/Recovery | Disposal |
|----------------------------------|--|--|--|------------------------|
| Soils/ Green waste / vegetation | Opportunities to reuse 'cut' material as 'fill' in proposed noise bund. | | | Landfill and cover |
| Mixed waste | Use of standard sizes. Arrange to take back unused materials with the supplier. Unused materials with the supplier. | N/A | Segregate materials to maximise the potential for recycling. | Landfill/ incineration |
| Metal | Made to measure, correct ordering, just in time delivery, store correctly. Arrange to take back unused materials with the supplier. | | Segregate waste and send to the metal recycler. | Landfill |
| Timber | Avoid over-ordering. Provision of suitable storage to avoid damage. Arrange to take back unused materials with the supplier. | | Re-use / Recycle if feasible. | Landfill/ incineration |
| Packaging | Ask suppliers to send the product with minimal packaging / reusable containers, buy bulk not individually wrapped products. Return pallet to the supplier or use plastic pallets. | N/A | Segregate materials to maximise the potential for recycling. | Landfill/ incineration |
| General Office waste | Print double-sided, send documents electronically, reusable crockery and cutlery. | Reuse paper, cartridges, plastic cups, tins and cardboard. | Segregate and recycle white paper. Send for composting (food waste only). | Landfill |
| WEEE | N/A | Re-use elsewhere on site. | Send to a dedicated recycling facility for recovery and recycling. | Landfill |
| Paint tins, line markers, mastic | Use solvent-free paints that are not disposed of as hazardous waste, maximise the use of mechanical fitting rather than adhesives. Arrange to take back unused materials with the supplier. | Use a lockable COSHH container for storage. | N/A | Landfill |