



STRAVICA

COMPANY POLICY | WATER HYGIENE & LEGIONELLA CONTROL

Environmental Policy

Protecting Water. Preventing Pollution. Reducing Carbon.



Document Control

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1.0	24 Oct 2026	Full rewrite to reflect Stravica Ltd's specialist focus on water hygiene and Legionella control and its asset-light prime contractor model. Adds controls for chlorinated water discharge, water use during flushing and disinfection, tank sediment and chemical waste, sample logistics, protected species in roof spaces and plant rooms, delivery partner environmental standards, water-specific KPIs and appendices. Updates public procurement references to the Procurement Act 2023 and PPN 006.	A. Olanrewaju, Director

Related Stravica Policies

This policy forms part of Stravica Ltd's integrated management framework and should be read alongside the Health & Safety Policy (STR-POL-HS-001), the Data Protection & GDPR Policy, the Equality & Diversity Policy, the Modern Slavery & Human Trafficking Policy and the Anti-Bribery & Corruption Policy.

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1. Introduction And Purpose

1.1 About Stravica Ltd

Stravica Ltd is a UK prime contractor specialising in water hygiene and Legionella control. We deliver Legionella risk assessments, water hygiene monitoring, Legionella and water sampling, water tank cleaning and disinfection, water system remedial works and planned water hygiene maintenance. Our clients include housing providers, healthcare and care settings, education establishments, local authorities, transport operators and commercial estates.

Stravica operates an asset-light prime contractor model. We hold contractual accountability to the client, provide contract management, governance and assurance, and appoint vetted specialist delivery partners to carry out the work on site. Our environmental responsibility therefore extends beyond our own direct footprint to the environmental performance of every partner working on a Stravica contract.

1.2 Purpose Of This Policy

This policy sets out Stravica Ltd's commitment to protecting the environment, preventing pollution and reducing carbon emissions. It defines the legal obligations, responsibilities, operational controls and performance measures that apply to all Stravica activities, with particular focus on the environmental aspects of water hygiene work.

1.3 Why Water Hygiene Has A Distinct Environmental Profile

Water hygiene services protect public health, but they carry specific environmental risks that a general facilities management policy does not address. The most significant are:

- Discharge of chlorinated or chemically treated water, which is highly toxic to fish and aquatic life if it reaches surface water drains, watercourses or the ground.
- Consumption of large volumes of potable water through flushing regimes, tank draining and system disinfection.
- Generation of tank sediment, sludge, spent chemicals, chemical containers and contaminated PPE, some of which may be hazardous waste.
- Transport emissions from operatives travelling between sites and from the movement of samples to laboratories within strict time limits.
- The energy needed to keep stored hot water at Legionella-control temperatures.
- Disturbance of protected species, particularly bats and nesting birds, in roof spaces, lofts and plant rooms where water tanks are located.

Stravica's approach is to deliver full Legionella compliance while minimising each of these impacts. Public health always comes first: no environmental measure will be applied in a way that compromises Legionella control or the written scheme. Within that constraint, we seek every opportunity to reduce water use, chemical use, waste, energy and carbon.

1.4 Objectives

- Prevent pollution of watercourses, drains, land and air arising from Stravica contracts, with a target of zero pollution incidents.
- Ensure every litre of chlorinated or chemically treated water is neutralised and discharged lawfully.
- Minimise water used for hygiene purposes without compromising Legionella control.

- Manage all waste in line with the waste hierarchy and the duty of care.
- Measure and reduce greenhouse gas emissions across Scopes 1, 2 and 3, on a path to net zero by 2045.
- Embed environmental standards in delivery partner selection, contracts and monitoring.
- Comply with all applicable environmental legislation and client requirements.
- Help clients reduce the water and energy footprint of their own estates through risk assessment recommendations and remedial works.

2. Scope And Application

2.1 Activities Covered

- All water hygiene services delivered under Stravica contracts, by Stravica or by its delivery partners.
- Contract management, administration and bid activities carried out by Stravica.
- Travel and transport associated with Stravica contracts, including movement of samples, chemicals, equipment and waste.
- Procurement of goods, materials, chemicals, laboratory services and subcontracted services.
- Digital systems used to record, store and report contract data.

2.2 Persons Covered

This policy applies to Stravica's directors, staff and agency workers, and to every delivery partner, supplier and laboratory engaged on Stravica contracts. Compliance with this policy is a contractual requirement for all delivery partners.

2.3 Geographical Coverage

Stravica Ltd operates across England, Scotland and Wales. Environmental regulation is devolved, and this policy is applied alongside the requirements of the relevant regulator: the Environment Agency in England, Natural Resources Wales in Wales and the Scottish Environment Protection Agency (SEPA) in Scotland, together with the local sewerage undertaker for each site.

2.4 Service-Level Environmental Profile

Service	Principal Environmental Aspects
Legionella Risk Assessments	Travel to site; paper and digital reporting. Positive influence through recommendations that remove redundant pipework, reduce oversized storage and improve insulation.
Water Hygiene Monitoring	Travel; water drawn off during temperature checks; weekly flushing of little-used outlets.
Legionella & Water Sampling	Travel; time-critical courier transport to laboratories; single-use sample bottles and packaging; cool packs.
Water Tank Cleaning & Disinfection	Draining and refilling of tanks; chlorinated water discharge; dechlorination chemicals; sediment and sludge waste; chemical containers; contaminated PPE.
Water System Remedial Works	Removed pipework, tanks, valves and insulation; metals for recycling; packaging; flushing and disinfection of new or modified pipework; possible disturbance of protected species and asbestos-containing materials.

Service	Principal Environmental Aspects
Planned Water Hygiene Maintenance	Travel; descaling and disinfection chemicals; water used during flushing and shower head cleaning; replacement parts.

3. Legal And Regulatory Framework

3.1 Environmental Legislation

Legislation	Relevance To Stravica Services
Environmental Protection Act 1990 (Part 2 and section 34 duty of care)	Duty of care for all waste produced on Stravica contracts, including tank sediment, chemical containers, removed pipework and PPE.
Environment Act 2021	Framework for environmental targets, including water quality and resource efficiency, and biodiversity duties.
Water Resources Act 1991	Offence of causing or knowingly permitting polluting matter to enter controlled waters.
Water Industry Act 1991 (including section 118)	Discharges of anything other than domestic sewage to the public sewer, including chlorinated or dechlorinated disinfection water, require the sewerage undertaker's consent.
Environmental Permitting (England and Wales) Regulations 2016	Prohibits unpermitted water discharge activities and groundwater activities; governs waste operations.
Waste (England and Wales) Regulations 2011 and Waste (Scotland) Regulations 2012	Application of the waste hierarchy; waste transfer notes; separate collection of recyclables.
Hazardous Waste (England and Wales) Regulations 2005 and Special Waste Regulations 1996 (Scotland)	Classification, consignment and record keeping for hazardous waste such as contaminated sediment, residual chemicals and contaminated containers.
Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991	Waste may only be transferred to, and carried by, registered waste carriers.
Waste Electrical and Electronic Equipment Regulations 2013	Disposal of removed water heaters, UV units, pumps and electronic controls.
Water Supply (Water Fittings) Regulations 1999 and the Scottish Byelaws 2014	Prevention of waste, misuse, undue consumption and contamination of water supplies during remedial works.
Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981	Protection of bats and their roosts and of nesting wild birds, which may be present in lofts, roof spaces and rooftop plant areas.
Control of Substances Hazardous to Health Regulations 2002 and GB CLP	Classification, labelling and safe handling of disinfection and descaling chemicals, including environmental hazards.
Climate Change Act 2008 (2050 Target Amendment) Order 2019	UK legal net zero target, which underpins public sector carbon reduction requirements.
Scottish water environment regulations administered by SEPA	Authorisation of discharges to the water environment in Scotland.

3.2 Public Procurement Requirements

- Procurement Act 2023, which has governed new public procurements since 24 February 2025.
- Procurement Policy Note 006 (Taking Account of Carbon Reduction Plans in the Procurement of Major Government Contracts), which replaced PPN 06/21. Stravica maintains a Carbon Reduction Plan in the published format.
- National Procurement Policy Statement and client social value frameworks, including environmental outcomes under the Social Value Model, TOMs and HACT, as specified by individual clients.
- Crown Commercial Service Supplier Code of Conduct.

3.3 Standards And Guidance

- ISO 14001:2015 Environmental Management Systems. Stravica's environmental management arrangements are structured to align with ISO 14001 principles.
- GHG Protocol Corporate Standard and UK Government GHG Conversion Factors for Company Reporting, used for carbon accounting.
- HSE ACoP L8 and HSG274, which set the hygiene standards that environmental measures must never compromise.
- BS 8558:2015 and BS EN 806, including requirements for flushing and disinfection of water installations.
- Guidance for Pollution Prevention (GPP) issued by the UK environmental regulators, including GPP 21 (pollution incident response planning) and GPP 2 (above-ground oil storage tanks).
- ISO 20400:2017 Sustainable Procurement.

3.4 Legal And Other Requirements Register

Stravica maintains a register of the environmental legislation, consents, permits and client requirements that apply to its contracts. The register is reviewed at least annually and whenever a new contract, region or legal change introduces new obligations. Site-specific discharge consents and client environmental requirements are recorded at mobilisation for every contract.

4. Statement Of Intent

Stravica Ltd recognises that the services we provide to protect public health must also protect the environment. We are committed to delivering every water hygiene service in a way that prevents pollution, conserves water, minimises waste and reduces carbon emissions, while never compromising the control of Legionella and other water-borne pathogens.

To meet this commitment, Stravica Ltd will:

- Comply with all applicable environmental legislation, consents and client requirements.
- Prevent pollution by ensuring that all chlorinated and chemically treated water is neutralised before lawful discharge, and that no polluting matter enters surface water drains, watercourses or the ground.
- Use the minimum volume of water needed to achieve effective hygiene outcomes, and help clients reduce unnecessary water use through risk-based recommendations.
- Apply the waste hierarchy and the duty of care to all waste, using only registered carriers and authorised facilities.
- Select chemicals and methods that achieve effective disinfection with the lowest environmental impact.

- Measure, report and reduce greenhouse gas emissions, maintain a Carbon Reduction Plan and work towards net zero by 2045.
- Protect wildlife and protected species encountered during our work.
- Require every delivery partner to meet the environmental standards in this policy, and monitor their performance.
- Set measurable objectives, monitor performance and continually improve.
- Communicate this policy to all staff, partners and suppliers, and make it publicly available.

Policy Approval

- Signed on behalf of Stravica Ltd by Adeola Olanrewaju, Director.
- Date of approval: 24 October 2026.
- This statement is issued to every delivery partner at mobilisation and published at www.stravica.uk.

5. Governance And Responsibilities

5.1 Governance Model

The Director holds overall accountability for environmental performance and is the designated Environmental Lead. Environmental requirements are built into each contract through mobilisation, RAMS review, delivery partner monitoring and management review, so that environmental governance runs through the same assurance processes as health, safety and quality.

Role	Environmental Responsibilities
Director (Environmental Lead)	Approves this policy and sets objectives. Ensures resources are available. Owns the Carbon Reduction Plan. Approves delivery partner appointments. Reviews environmental incidents. Leads annual management review. Liaises with clients and regulators on environmental matters.
Compliance & Procurement Administration	Maintains the legal register, approved delivery partner register and supplier records. Verifies waste carrier registrations, discharge consents and environmental certificates. Collates environmental KPI and carbon data.
Delivery Partner Contract Manager	Ensures site-specific RAMS include environmental controls. Obtains discharge permissions. Manages waste and chemicals. Reports environmental incidents and KPI data to Stravica.
Delivery Partner Supervisors and Operatives	Follow environmental controls in RAMS. Dechlorinate and test before discharge. Segregate waste. Carry and use spill kits. Check for protected species before entering roof spaces. Report incidents and near misses immediately.
Suppliers and Laboratories	Provide products and services that meet the environmental requirements of this policy. Provide data needed for Stravica's carbon and waste reporting on request.

5.2 Prime Contractor Accountability

Appointing a delivery partner does not transfer Stravica's contractual accountability for environmental performance. Stravica remains answerable to the client for every environmental incident, waste movement and discharge on its contracts, and therefore verifies delivery partner compliance through the arrangements in Section 15.

6. Environmental Management System

6.1 Framework

Stravica operates an environmental management system based on the Plan, Do, Check, Act cycle and structured to align with ISO 14001:2015. The system is proportionate to an asset-light prime contractor and is designed to control the environmental aspects of delivery partner activity as well as Stravica's own direct activities.

Stage	Environmental Activities
Plan	Identify aspects and impacts for each contract. Confirm discharge routes, waste streams and protected species risks. Record legal and client requirements. Set objectives and KPIs.
Do	Approve RAMS with environmental controls. Brief operatives. Dechlorinate and verify before discharge. Segregate and consign waste. Record water use, chemical use and waste data.
Check	Review KPI data. Carry out site audits. Check waste documentation and carrier registrations. Investigate incidents and complaints.
Act	Agree corrective actions. Update RAMS and procedures. Share lessons with delivery partners. Review objectives at management review.

6.2 System Elements

1. Environmental Policy (this document).
2. Environmental Aspects and Impacts Register (Section 7 and Appendix A).
3. Legal and Other Requirements Register (Section 3.4).
4. Objectives, targets and KPIs (Sections 8 and 18).
5. Operational controls for discharge, water use, chemicals, waste, travel and biodiversity (Sections 9 to 14).
6. Delivery partner environmental standards (Section 15).
7. Incident response procedure (Section 16 and Appendix B).
8. Monitoring, audit and management review (Sections 18 and 19).

6.3 Certification Readiness

Stravica does not currently hold ISO 14001 certification. Its environmental management arrangements are maintained in a form consistent with the standard, and Stravica gives preference to delivery partners and suppliers who hold ISO 14001 or an equivalent certified environmental management system.

7. Environmental Aspects And Impacts

7.1 Methodology

Environmental aspects are identified for each service and each contract. Each aspect is rated for likelihood and consequence on a scale of 1 to 5. The product determines significance: 15 to 25 is high, 8 to 14 is medium and 1 to 7 is low. Significant aspects receive specific controls in site RAMS and are briefed to operatives. The register is reviewed annually and whenever a new service, method, chemical or contract is introduced.

7.2 Significant Aspects Register

Aspect	Potential Impact	Rating	Key Controls
Discharge of chlorinated water from tank and system disinfection	Toxic to aquatic life; pollution of watercourses; breach of sewer consent	High	Dechlorinate with sodium thiosulphate; verify zero residual chlorine before discharge; foul sewer only, with consent; never surface water drains (Section 9)
Spillage of concentrated disinfectants or descalers	Land and water pollution; harm to wildlife	High	Minimum quantities carried; secured transport; drip trays; spill kits; drain covers; trained operatives
Water used in flushing, draining and disinfection	Depletion of water resources; energy and carbon in treatment and supply	Medium	Risk-based flushing; removal of redundant outlets and dead legs; efficient draining and refilling (Section 10)
Tank sediment and sludge	Contamination of land and water if mismanaged	Medium	Containment; waste classification; registered carriers; correct transfer or consignment notes (Section 12)
Disturbance of bats or nesting birds in roof spaces and plant areas	Harm to protected species; criminal offence	Medium	Pre-entry checks; stop work if signs are found; seek ecological advice (Section 14)
Vehicle travel by operatives	Greenhouse gas emissions; air pollution; congestion	Medium	Route planning; grouping visits geographically; local operatives; efficient vehicles (Section 13)
Sample transport to laboratories	Courier emissions; packaging waste	Low to medium	Batch samples; use nearest suitable UKAS laboratory; reusable cool boxes
Removed tanks, pipework, valves and insulation	Landfill; loss of recyclable metals	Medium	Segregate metals for recycling; WEEE route for electrical items; asbestos route for suspect materials
Energy used to maintain hot water temperatures	Carbon emissions from client estates	Medium (indirect)	Recommendations on insulation, storage sizing and system design that cut energy without compromising control
Single-use plastics (sample bottles, gloves, packaging)	Plastic waste	Low	Reduce where hygiene allows; recycle uncontaminated packaging; supplier take-back
Paper records	Resource use	Low	Digital logbooks and electronic reporting as standard

8. Environmental Objectives And Targets

Objectives are set at the annual management review. Each objective is specific, measurable and linked to a legal, contractual or strategic driver. The current objectives are set out below.

Ref	Objective	Target	Review
E-01	Prevent pollution from Stravica contracts	Zero pollution incidents reportable to an environmental regulator or sewerage undertaker	Quarterly
E-02	Lawful discharge of all disinfection water	100% of disinfection tasks with a recorded dechlorination test before discharge	Monthly
E-03	Full duty of care compliance	100% of waste movements supported by valid transfer or consignment notes and verified carrier registrations	Quarterly
E-04	Divert waste from landfill	At least 90% of non-hazardous waste from remedial works, including all removed metals, diverted from landfill	Annual
E-05	Measure and reduce carbon	Complete the first full-year baseline across Scopes 1, 2 and 3. Then reduce emissions per contract visit year on year, on a path to net zero by 2045	Annual
E-06	Environmental standards in the supply chain	100% of delivery partners with a current environmental policy; preference for ISO 14001 certification	Annual
E-07	Paper-free records	100% of monitoring, sampling and completion records issued digitally	Annual
E-08	Water efficiency advice to clients	Every Legionella risk assessment identifies redundant outlets, dead legs and storage over-capacity where present	Annual

9. Discharge Of Disinfected Water And Pollution Prevention

The discharge of chlorinated water is the most significant environmental risk in Stravica's operations. Water chlorinated for tank and system disinfection typically holds free chlorine at around 50 mg/l, many thousands of times the level that harms fish and invertebrates. Chlorinated water must never enter a surface water drain, a watercourse or the ground.

9.1 Planning The Discharge

- Before disinfection starts, the discharge route is identified and confirmed as connected to the foul or combined sewer. Drainage plans and client information are used, and dye testing is carried out where there is any doubt.
- Where required, consent is obtained from the sewerage undertaker for the volume and nature of the discharge. Any conditions, such as flow rate, timing or residual chlorine limits, are recorded in the RAMS.
- Where no suitable foul connection exists, the water is neutralised and collected by tanker for disposal at an authorised facility.
- Surface water gullies near the work area are identified and protected with drain covers before chemicals are brought on site.

9.2 Neutralisation And Verification

1. At the end of the contact period, the disinfected water is neutralised, normally with sodium thiosulphate at the dose specified in the method statement.
2. Residual chlorine is tested with a calibrated test kit or photometer at the discharge point.
3. Discharge proceeds only when the result confirms that chlorine has been neutralised to the level required by the method statement and any sewer consent.
4. The test result, time, volume discharged and operative are recorded on the completion certificate.
5. Discharge is controlled at a steady rate so that drains do not surcharge and the flow cannot overflow into surface water systems.

9.3 Other Disinfectants

Where chlorine dioxide, silver-stabilised hydrogen peroxide or other biocides are used, the neutralisation method, discharge conditions and verification test are taken from the manufacturer's technical data and the Safety Data Sheet, and are approved in the method statement before work starts. Water containing descaling acids is neutralised before discharge.

9.4 Chemical Storage And Transport

- Only the quantity of chemical needed for the task is taken to site.
- Chemicals are carried in original, labelled, sealed containers, secured upright in vehicles and segregated so that hypochlorite never comes into contact with acids.
- Drip trays or bunds are used when chemicals are decanted or dosed.
- Spill kits suitable for the chemicals in use, including absorbents and drain covers, are carried to every disinfection task.
- Chemicals are never left unattended in areas accessible to the public, residents, pupils or patients.

Golden Rule

If there is any doubt about where a drain goes, the water does not go down it. Work stops until the discharge route has been confirmed.

10. Water Efficiency And Responsible Water Use

Water hygiene work necessarily uses water. Flushing little-used outlets, draining and refilling tanks, and disinfecting systems all consume potable water that has been treated and pumped at an energy and carbon cost. Stravica's aim is to use as much water as hygiene requires and no more.

10.1 Principles

- Hygiene first: flushing and disinfection required by the written scheme, ACoP L8 or HSG274 are never reduced on environmental grounds.
- Remove the cause: the most effective way to reduce flushing water is to remove the need for it. Risk assessments therefore identify redundant outlets, dead legs and under-used branches that can be removed or cut back, so that weekly flushing is no longer needed.
- Right-size storage: oversized cold water storage increases stagnation, water turnover problems and the volume to be drained and disinfected. Risk assessments recommend reducing storage capacity where appropriate.

- Efficient methods: flushing durations are set to achieve the required temperature or turnover, not longer. Tanks are isolated and drained in a planned sequence to avoid unnecessary refills.
- Leak awareness: operatives report dripping taps, running overflows, leaking valves and float valve faults found during visits, since these waste water and can indicate hygiene problems.

10.2 Recording Water Use

For tank cleaning and system disinfection, the volume of water drained and used is estimated from tank dimensions and recorded on the completion certificate. This data supports Stravica's environmental reporting and helps clients understand the water footprint of their hygiene regime.

10.3 Supporting Client Water Targets

Many public sector clients have water reduction targets. Stravica supports these by identifying water-saving opportunities in risk assessment reports, such as dead leg removal, storage reduction, outlet rationalisation and overflow repairs, and by providing data on water used during hygiene activities where requested.

11. Chemical Selection And Minimisation

- Disinfection methods are selected on the basis of effectiveness first, then lowest environmental and health impact. Thermal disinfection, mechanical cleaning and targeted remedial works are considered alongside chemical methods.
- Chemicals are dosed using calibrated equipment and verified with test kits, so that overdosing is avoided.
- Products are bought from reputable suppliers with full Safety Data Sheets that set out environmental hazards and disposal requirements.
- Where available, products in recyclable or returnable containers are preferred.
- Where secondary disinfection systems such as silver-copper ionisation or chlorine dioxide dosing are present on client sites, Stravica considers potential discharge impacts as part of the risk assessment and advises clients accordingly.
- Out-of-date or unused chemicals are returned to the supplier where possible, or disposed of as hazardous waste.

12. Waste Management And Circular Economy

12.1 Waste Hierarchy

All waste is managed in line with the waste hierarchy, in descending order of preference:

1. Prevention: avoid creating waste, for example through digital records and accurate ordering of parts.
2. Preparation for reuse: reuse serviceable components and packaging.
3. Recycling: segregate metals, plastics and packaging for recycling.
4. Other recovery: send residual waste for energy recovery where available.
5. Disposal: landfill only as a last resort.

12.2 Water Hygiene Waste Streams

Waste Stream	Classification	Required Route
Tank sediment, sludge and debris	Non-hazardous, unless contaminated with hazardous substances; assessed on each job	Contained and removed by a registered carrier to an authorised facility under a waste transfer note, or a consignment note if hazardous
Residual or out-of-date chemicals	Hazardous	Supplier return or hazardous waste contractor with consignment note
Empty chemical containers	Hazardous if contaminated; non-hazardous if triple-rinsed where the Safety Data Sheet allows	Supplier take-back, or a licensed route as classified
Contaminated PPE (gloves, RPE filters, coveralls)	Assessed against the contamination present	Bagged and disposed of through the appropriate licensed route
Removed copper, steel and brass pipework and fittings	Non-hazardous	Segregated for metal recycling
Removed GRP or plastic water tanks	Non-hazardous	Recycling where available; otherwise authorised disposal
Removed water heaters, pumps, UV units, controls	WEEE	Authorised WEEE treatment facility
Suspect asbestos-containing materials	Hazardous	Not disturbed. Reported to the client and handled only by licensed specialists under the client's asbestos management arrangements
Packaging, cardboard and plastics	Non-hazardous	Segregated for recycling
Used sample bottles and cool packs	Managed by the laboratory	Returned to the laboratory; reusable cool boxes used

12.3 Duty Of Care

- Waste is only transferred to carriers registered with the relevant environmental regulator. Registrations are checked before first use and annually.
- Every transfer of non-hazardous waste is supported by a waste transfer note, retained for at least two years. Hazardous waste consignment notes are retained for at least three years.
- Waste is described accurately with the correct List of Waste (EWC) code.
- Stravica audits delivery partner waste records as part of contract monitoring.

13. Carbon, Energy And Transport

13.1 Carbon Accounting Boundary

Stravica measures greenhouse gas emissions using the GHG Protocol Corporate Standard and the UK Government GHG Conversion Factors. As an asset-light prime contractor without its own fleet or operational premises, most of Stravica's footprint falls within Scope 3.

Scope	Sources Included
Scope 1	Fuel used in any vehicles owned or leased by Stravica
Scope 2	Purchased electricity for any premises controlled by Stravica
Scope 3	Purchased services, mainly delivery partner travel and site activity on Stravica contracts; business travel; employee commuting and home working; upstream transport, including sample couriers; waste generated in operations; purchased goods, including chemicals and parts

13.2 Carbon Reduction Plan And Net Zero Commitment

Stravica commits to achieving net zero emissions by 2045. The company maintains a Carbon Reduction Plan in the format required by PPN 006. This plan sets out the baseline year, current emissions, the reduction measures in place and the commitment to net zero, and is signed off by the Director and published at www.stravica.uk. The baseline will be the first full year of operational data across Scopes 1, 2 and the PPN 006 Scope 3 categories.

13.3 Reduction Measures

- Local delivery: delivery partners are selected with operatives based close to each contract area, reducing travel distances.
- Route planning: monitoring rounds and PPM visits are scheduled in geographical clusters to minimise mileage and repeat journeys.
- Right first time: complete RAMS, confirmed access and correct parts reduce failed visits and return trips.
- Low-emission vehicles: delivery partners are encouraged to move to electric or hybrid vehicles and to report vehicle types and mileage for Stravica contracts.
- Sample logistics: samples are batched, and the nearest suitable UKAS-accredited laboratory is used, within method time limits.
- Remote working: Stravica's contract management and administration are delivered remotely, avoiding commuting and office energy use. Contract meetings are held online wherever an in-person meeting is not required.
- Green electricity: any premises Stravica controls will be supplied with renewable electricity where available.
- Offsetting: priority is given to genuine reductions. Any offsetting for residual emissions will use recognised, verified schemes and will not be claimed in place of reductions.

13.4 Energy In Client Hot Water Systems

Keeping stored hot water at 60°C or above is essential for Legionella control and is never reduced to save energy. Stravica's risk assessments do, however, identify energy-saving opportunities that are consistent with control. These include improving insulation on hot water pipework and calorifiers, cold water pipework insulation to prevent heat gain, removing redundant hot water storage, balancing circulation systems, and considering point-of-use heaters where a long run of pipework serves very few outlets.

14. Biodiversity And Protected Species

Cold water storage tanks are often located in lofts, roof voids and rooftop plant areas. These are places where bats roost and birds nest. All UK bat species and their roosts are protected by law, as are wild birds and their active nests. Disturbing them can be a criminal offence.

14.1 Controls

- Before entering a loft, roof void or rooftop plant area, operatives check for signs of bats, such as droppings, roosting bats or feeding remains, and for active bird nests.
- Client information on known roosts and any ecological constraints is obtained at mobilisation and included in RAMS.
- If bats or active nests are found, work that could disturb them stops, the area is left undisturbed and the client and Stravica are informed. Work only resumes when suitable ecological advice has been obtained and any required licence is in place.
- Lighting, noise and time spent in roof spaces are kept to the minimum needed for the task.
- Where bird or vermin access to tanks is found, the issue is reported. Humane, lawful proofing measures are recommended so that tank contamination is prevented without harming wildlife.
- Discharge controls in Section 9 protect aquatic habitats downstream of client sites.

15. Delivery Partner And Supplier Environmental Standards

15.1 Minimum Requirements

- A written environmental policy signed by a director.
- ISO 14001 certification or an equivalent environmental management system, which is given preference in selection.
- Registration as a waste carrier where the partner carries waste, and use of authorised disposal facilities.
- Documented procedures for dechlorination, discharge verification and spill response.
- Spill kits and drain covers carried in vehicles used for disinfection work.
- Willingness to provide data on mileage, vehicle types, waste and water use for Stravica's environmental and carbon reporting.
- Environmental awareness training for operatives (Section 17).
- No environmental enforcement action or prosecution in the previous three years, or full disclosure with evidence of corrective action.

15.2 Laboratories

Laboratories must be UKAS ISO/IEC 17025-accredited for the analyses required. Preference is given to laboratories with certified environmental management systems, reusable transport packaging and responsible disposal of samples and media.

15.3 Monitoring

Environmental performance is reviewed at contract review meetings and during Stravica site audits. Audits check discharge records, waste documentation, spill kit availability and chemical storage. Non-compliance is managed through corrective action plans, and serious or repeated failures lead to removal from the approved delivery partner register.

15.4 Sustainable Procurement

Purchasing decisions consider whole-life environmental impact as well as cost and quality, in line with ISO 20400 principles. Stravica prefers products with lower environmental impact, recyclable or returnable packaging, and suppliers who can show credible carbon reduction commitments.

16. Environmental Incidents And Emergency Response

16.1 What Is An Environmental Incident

An environmental incident includes any spill or release of chemicals, any discharge of untreated chlorinated or chemically treated water to a surface water drain, watercourse or land, any escape of tank sediment, any disturbance of a protected species, any waste handled outside the duty of care, and any complaint about environmental nuisance.

16.2 Immediate Response

1. Stop the activity and the source of the release if it is safe to do so.
2. Contain the spill using absorbents and drain covers, and prevent it from reaching drains or watercourses.
3. Inform the supervisor, the Delivery Partner Contract Manager, Stravica and the client's site contact immediately.
4. If polluting matter has entered or may enter a watercourse or surface water drain, report it straight away to the relevant regulator's incident hotline: the Environment Agency (0800 80 70 60) in England, Natural Resources Wales (0300 065 3000) in Wales or SEPA (0800 80 70 60) in Scotland. Also inform the sewerage undertaker if the public sewer is affected.
5. Clean up contaminated materials and dispose of them as waste under the duty of care.
6. Record the incident using the information set out in Appendix B.

16.3 Investigation

All environmental incidents are investigated in proportion to their actual and potential severity to identify root causes. Corrective actions are assigned owners and deadlines and tracked to closure. Lessons learned are shared with every delivery partner and, where relevant, with the client.

17. Training, Awareness And Communication

17.1 Training Requirements

Audience	Environmental Training Content
All persons on Stravica contracts	This policy; the environmental impacts of water hygiene work; incident reporting; waste segregation
Operatives carrying out disinfection	Dechlorination and verification testing; discharge route checks; drain protection; spill response; chemical storage and transport
Operatives entering roof spaces and plant areas	Recognising signs of bats and nesting birds; stop-work procedure
Remedial works operatives	Waste segregation; metal recycling; WEEE; asbestos awareness; Water Fittings Regulations requirements to prevent waste of water
Risk assessors	Identifying water and energy saving opportunities consistent with Legionella control
Contract managers	Duty of care; discharge consents; legal register; incident investigation; environmental data reporting

17.2 Communication

This policy is issued to every delivery partner at mobilisation and covered in site inductions. Environmental messages are reinforced through toolbox talks, safety and environmental alerts, and contract review meetings. The policy and the Carbon Reduction Plan are published at www.stravica.uk.

17.3 External Communication

Stravica communicates openly with clients, regulators and communities on environmental matters. Clients receive environmental data and incident reports as part of contract reporting. Complaints from residents, occupants or neighbours are recorded, investigated and answered.

18. Monitoring, KPIs And Audit

18.1 Key Performance Indicators

Area	KPI	Target	Frequency
Pollution	Environmental incidents reportable to a regulator or sewerage undertaker	Zero	Quarterly
Discharge	Disinfection tasks with a recorded pre-discharge dechlorination test	100%	Monthly
Waste	Waste movements with valid documentation and verified carrier	100%	Quarterly
Waste	Non-hazardous remedial waste diverted from landfill	At least 90%	Annual

Area	KPI	Target	Frequency
Carbon	Total tCO ₂ e (Scopes 1, 2 and 3) and tCO ₂ e per contract visit	Year-on-year reduction from baseline	Annual
Travel	Delivery partner mileage per visit on Stravica contracts	Year-on-year reduction	Annual
Supply chain	Delivery partners with a current environmental policy	100%	Annual
Supply chain	Delivery partners with ISO 14001 or equivalent	Increasing year on year	Annual
Records	Monitoring and completion records issued digitally	100%	Annual
Client value	Risk assessments that include water and energy saving recommendations where opportunities exist	100%	Annual

18.2 Audit Programme

- Stravica site audits of delivery partner environmental controls at least quarterly per contract.
- Annual review of each delivery partner's environmental documentation, waste records and carrier registrations.
- Annual internal review of compliance with this policy and the legal register.
- Findings are categorised as conformity, observation, minor non-conformance or major non-conformance. Major non-conformances are closed within 10 working days and minor non-conformances within 30 days.

19. Management Review And Continual Improvement

19.1 Management Review

The Director reviews environmental performance at least quarterly and holds a formal annual management review. The annual review considers:

- The suitability and effectiveness of this policy and the environmental management system.
- Performance against objectives and KPIs.
- Incidents, complaints, audit findings and corrective actions.
- Changes in legislation, guidance and client requirements.
- Carbon Reduction Plan progress.
- Delivery partner environmental performance.
- Resources needed and opportunities for improvement.

19.2 Continual Improvement

Improvement actions are logged, assigned owners and tracked to completion. Stravica will continue to look for better ways to deliver water hygiene with less impact. Examples include adopting lower-impact disinfection methods, increasing the use of electric vehicles by delivery partners, improving sample logistics and helping clients redesign water systems so that they need less flushing and less stored water.

20. Climate Resilience And Water Security

Climate change directly affects Legionella risk and water resources. Warmer summers raise the temperature of incoming mains water and of water in roof-level storage tanks. This can push cold water into the 20°C to 45°C range in which Legionella multiplies. At the same time, drought periods and water company restrictions put pressure on water use.

20.1 Managing Heat-Related Risk

- Cold water temperature trends from monitoring data are reviewed after periods of hot weather, so that sites where cold water regularly exceeds 20°C can be identified.
- Risk assessments recommend measures to reduce heat gain, such as insulating cold water pipework and tanks, relocating pipework away from heat sources, reducing stored volume to increase turnover and improving ventilation of tank rooms.
- Clients are advised when rising cold water temperatures need a review of their written scheme, monitoring frequency or sampling regime.

20.2 Drought And Water Restrictions

- Flushing and disinfection required to control Legionella are public health measures. They continue during drought periods, but every effort is made to use the minimum volume needed.
- Where water company restrictions apply, Stravica confirms with the client and, where necessary, the water company how essential hygiene activities will be carried out.
- Non-essential water use, such as extended flushing beyond the required duration, is avoided at all times and especially during restrictions.

20.3 Business Resilience

Stravica's delivery model, with multiple approved delivery partners and remote contract management, allows statutory monitoring to continue during severe weather, flooding or travel disruption. Disruption to statutory monitoring intervals is reported to clients without delay.

21. Environmental Social Value

Many public sector clients evaluate environmental outcomes as part of social value. Stravica commits to delivering environmental social value that is specific, measurable and mapped to each client's own framework, such as the Social Value Model, TOMs or HACT. Stravica will not claim the client's own project outcomes as its own social value.

Environmental Outcome	How Stravica Delivers It	How It Is Measured
Reduced water consumption on client estates	Identifying redundant outlets, dead legs and oversized storage in risk assessments, and removing them through remedial works	Number of outlets and dead legs removed; estimated weekly flushing volume avoided
Reduced energy and carbon on client estates	Insulation, storage reduction and circulation balancing recommendations consistent with Legionella control	Number of measures recommended and implemented

Environmental Outcome	How Stravica Delivers It	How It Is Measured
Reduced travel emissions	Local delivery partner operatives and clustered scheduling	Mileage per visit; proportion of visits by low or zero emission vehicles
Pollution prevention	Verified dechlorination and controlled discharge on every disinfection task	Percentage of tasks with recorded verification; zero incidents
Resource recovery	Recycling of removed metals, tanks and packaging	Tonnes diverted from landfill
Paper reduction	Digital logbooks and electronic reporting	Percentage of records issued digitally
Environmental awareness	Plain-English advice to clients' Responsible Persons on balancing hygiene with water and energy efficiency	Advice sessions and briefing notes delivered

22. Records And Data Management

Record	Minimum Retention
Non-hazardous waste transfer notes	Two years
Hazardous waste consignment notes and registers	Three years
Disinfection completion certificates, including dechlorination tests and discharge records	Five years
Sewerage undertaker consents and correspondence	For the life of the consent plus six years
Environmental incident reports and investigations	Six years
Carbon, travel and waste data	Six years
Delivery partner environmental documentation and audits	Duration of engagement plus six years

Environmental records are held electronically with controlled access, in line with Stravica's Data Protection & GDPR Policy. Longer retention periods apply where a client contract requires them.

Appendix A - Aspects And Impacts Assessment Method

A1. Likelihood Scale

Score	Likelihood	Description
1	Rare	Could only occur in exceptional circumstances
2	Unlikely	Could occur but is not expected
3	Possible	Might occur occasionally
4	Likely	Will probably occur in most circumstances
5	Almost certain	Expected to occur routinely

A2. Consequence Scale

Score	Consequence	Description
1	Negligible	No measurable environmental effect
2	Minor	Small, localised, short-term effect; no regulatory interest
3	Moderate	Localised effect requiring clean-up; possible client or regulator interest
4	Major	Pollution of a watercourse or land, harm to wildlife or breach of consent; regulator involvement
5	Severe	Widespread or long-lasting damage; prosecution likely

A3. Information Recorded In The Register

Field	Content Required
Activity	The service or task, for example tank disinfection
Aspect	The element of the activity that interacts with the environment
Impact	The resulting change to the environment
Legal driver	Applicable legislation or consent
Likelihood, consequence and significance	Scores before controls
Controls	Measures required in RAMS
Residual significance	Scores after controls
Owner and review date	Responsible person and next review

Appendix B – Environmental Incident Report Content

Field	Content Required
Reference, date and time	Unique incident reference and when the event occurred
Location and contract	Site address, area, drain or watercourse affected
Type of incident	Chemical spill, untreated discharge, sediment escape, waste non-compliance, protected species disturbance or complaint
Substance and quantity	Product name, concentration and estimated volume released
Receptor	Foul sewer, surface water drain, watercourse, land or air
Immediate actions	Containment, clean-up and notifications made
External notifications	Regulator and sewerage undertaker notified, with time and reference
Root cause	Findings of the investigation
Corrective actions	Actions, owners and target dates
Sign-off	Reviewed by the Delivery Partner Contract Manager and the Stravica Director, with dates

Appendix C – Pre-Discharge Checklist For Disinfection Works

To be completed and recorded for every tank or system disinfection before any water is discharged.

Check	Requirement
Discharge route confirmed	Connection to foul or combined sewer confirmed from drainage plans, client information or dye test
Consent	Sewerage undertaker consent obtained where required, with conditions recorded
Surface water protection	Gullies within the work area identified and covered
Spill kit	Present, complete and suitable for the chemicals in use
Neutralising agent	Correct agent and quantity available
Test equipment	Calibrated chlorine test kit or photometer, in date
Neutralisation verified	Residual chlorine tested at the discharge point and confirmed neutralised
Discharge rate	Controlled to prevent surcharging or overflow
Record	Test result, volume, time and operative recorded on the completion certificate

Appendix D - Delivery Partner Environmental Checklist

Requirement	Evidence Required
Environmental policy	Signed, current policy
Environmental management	ISO 14001 certificate or description of an equivalent system
Waste carrier registration	Registration number verified on the regulator's public register
Waste disposal facilities	Permits or exemptions of the facilities used
Discharge and spill procedures	Written dechlorination, verification and spill response procedures
Spill kits	Confirmation that kits are carried in vehicles used for disinfection
Enforcement history	Declaration of environmental enforcement or prosecutions in the last three years
Training	Environmental awareness and chemical handling training records
Carbon data	Agreement to report mileage, vehicle types and waste data for Stravica contracts
Vehicles	Details of vehicle types and any low or zero emission vehicles

Appendix E - Carbon Reduction Plan Summary Structure

Stravica's Carbon Reduction Plan follows the PPN 006 template and contains the following sections.

Section	Content
Commitment to net zero	Stravica Ltd commits to net zero emissions by 2045
Baseline emissions	Baseline year and emissions for Scopes 1 and 2 and the required Scope 3 categories
Current emissions	Emissions for the most recent reporting year
Emissions reduction targets	Projected reduction trajectory towards net zero
Carbon reduction projects	Completed and planned measures, including those in Section 13.3 of this policy
Declaration and sign-off	Signed by the Director and published at www.stravica.uk

Appendix F – Service Environmental Controls Summary

A quick reference to the minimum environmental controls for each Stravica service. Site-specific RAMS must include these controls and any additional controls required by the client or the site.

Service	Minimum Environmental Controls
Legionella Risk Assessments	Clustered scheduling; digital surveys and reports; check for protected species before entering roof spaces; identify water and energy saving opportunities consistent with control
Water Hygiene Monitoring	Flush only for the time needed to reach stable temperatures; report leaks, dripping taps and running overflows; digital logbooks; route planning
Legionella & Water Sampling	Batch samples; nearest suitable UKAS laboratory; reusable cool boxes; return used bottles to the laboratory; minimise flushing beyond the sampling method
Water Tank Cleaning & Disinfection	Pre-discharge checklist (Appendix C); dechlorination and verification; drain protection; spill kit; sediment contained and removed under the duty of care; record water volume used
Water System Remedial Works	Segregate metals for recycling; WEEE route for electrical items; do not disturb suspect asbestos; flush and disinfect new pipework with verified discharge; WRAS-approved fittings to prevent waste and contamination
Planned Water Hygiene Maintenance	Minimum chemical quantities; neutralise descaling solutions before discharge; reuse serviceable parts; digital task records

Appendix G – Water And Energy Saving Recommendations Library

Recommendations that Stravica risk assessors consider on every assessment. Each one reduces water or energy use while maintaining or improving Legionella control. Recommendations are only made where they are appropriate to the system and the occupants.

Recommendation	Hygiene Benefit	Environmental Benefit
Remove redundant outlets and dead legs	Removes stagnation points	Ends weekly flushing of those outlets, saving water
Reduce oversized cold water storage	Improves turnover and reduces stagnation	Smaller volume to drain, refill and disinfect
Insulate cold water tanks and pipework	Keeps cold water below 20°C	Reduces condensation damage and water wastage from rejected supplies
Insulate hot water pipework and calorifiers	Helps maintain 50°C to 60°C	Reduces heat loss and energy use
Balance hot water circulation	Achieves temperatures at all sentinel outlets	Avoids overheating at the plant to compensate for poor circulation

Recommendation	Hygiene Benefit	Environmental Benefit
Rationalise hot water storage	Reduces volume held at risk temperatures	Less stored water to heat and maintain
Point-of-use heaters for remote, low-use outlets	Avoids long, poorly circulated runs	Reduces distribution heat loss
Repair overflows, float valves and leaks	Restores correct tank operation	Stops continuous water loss
Install sentinel temperature sensors where suitable	Continuous monitoring and earlier warnings	Fewer site visits and less travel

Appendix H – Regulators And Contacts By Nation

Matter	England	Wales	Scotland
Environmental regulator	Environment Agency	Natural Resources Wales	Scottish Environment Protection Agency (SEPA)
Pollution incident hotline	0800 80 70 60	0300 065 3000	0800 80 70 60
Waste carrier registration	Environment Agency public register	Natural Resources Wales public register	SEPA public register
Hazardous waste regime	Hazardous Waste (England and Wales) Regulations 2005	Hazardous Waste (Wales) Regulations 2005	Special Waste Regulations 1996 (as amended)
Discharges to public sewer	Local sewerage undertaker consent under the Water Industry Act 1991	Local sewerage undertaker consent under the Water Industry Act 1991	Scottish Water consent under the Sewerage (Scotland) Act 1968
Water fittings	Water Supply (Water Fittings) Regulations 1999	Water Supply (Water Fittings) Regulations 1999	Water Supply (Water Fittings) (Scotland) Byelaws 2014
Healthcare water guidance	HTM 04-01	WHTM 04-01	SHTM 04-01

Contact numbers are checked at each annual review of this policy. Operatives should always use the number displayed in their vehicle spill kit and site RAMS, which are updated whenever a change is notified.

Appendix I – Environmental Toolbox Talk: Disinfection And Discharge

This briefing is delivered to every operative before their first disinfection task on a Stravica contract, and is repeated at least annually.

11. Why It Matters

Water at disinfection strength is lethal to fish and river life. A single tank of chlorinated water reaching a surface water drain can cause a fish kill in a local stream, lead to prosecution and seriously damage the client's reputation and Stravica's.

I2. Before You Start

- Know where your water will go. Check the drainage route against the RAMS. If you are unsure, ask before you begin.
- Cover every gully near your work area.
- Check that your spill kit, neutralising agent and test kit are present and in date.
- Take only the chemical you need, in its original labelled container.

I3. During The Work

- Keep hypochlorite and acids apart at all times.
- Dose accurately. More chemical is not better.
- Keep chemicals attended and out of reach of the public.

I4. Before You Discharge

- Neutralise, then test at the discharge point.
- Discharge only when the test confirms neutralisation.
- Control the flow rate so that drains do not back up.
- Record the result, volume and time.

I5. If Something Goes Wrong

- Stop, contain and cover drains.
- Call your supervisor, Stravica and the client immediately.
- If anything has reached a surface water drain or watercourse, call the regulator's incident hotline straight away.
- Never try to hide a spill. Early reporting limits the harm.

Appendix J - Glossary

Term	Meaning
Controlled waters	Rivers, streams, lakes, groundwater and coastal waters protected under the Water Resources Act 1991
Dead leg	A length of pipework where water can stagnate, often requiring removal or regular flushing
Dechlorination	Neutralising residual chlorine in water before discharge, normally with sodium thiosulphate
Delivery partner	A specialist subcontractor appointed by Stravica to deliver services under Stravica's control
Duty of care	The legal duty to manage waste safely and transfer it only to authorised persons
EWC code	European Waste Catalogue code, now the List of Waste code, used to classify waste
Foul sewer	A sewer carrying wastewater to a treatment works
PPN 006	Procurement Policy Note requiring Carbon Reduction Plans for major government contracts
Scope 1, 2 and 3	GHG Protocol categories of direct, energy-related indirect, and other indirect emissions
Surface water drain	A drain carrying rainwater directly to a watercourse without treatment

Term	Meaning
WEEE	Waste electrical and electronic equipment

Stravica Ltd

- 20-22 Wenlock Road, London N1 7GU
- info@stravica.uk | www.stravica.uk
- Company No. 16756638