



**BESPOKE RECYCLING**  

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**SOLUTIONS**

*Environmental Policy and  
Management System*

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Last Approved By	Luke Boden	07 / 09 / 2022

## POLICY REVIEW RECORD

A review of the company policy is to be carried out by a senior member of the management team, as often as is required. Regular reviews of the company policy must be carried out to ensure it remains effective and relevant.

It is general company policy to carry out the review annually, as a minimum. Other circumstances when a review of company policy may be required include when there are significant changes to legislation, company operating practices, management structure or personnel, etc.

Review No	Date	Details / Revision	Carried out by
1	10/10/2018	<i>In compliance with current operations</i>	LB
2	25/09/2019	<i>In compliance with current operations</i>	LB
3	15/09/2020	<i>Addition of processing and personnel within EPS</i>	MT
4	14/09/2021	<i>In compliance with current operations</i>	LB
5	07/09/2022	<i>Change of Organization Chart</i>	LB
6	14/09/2023	In compliance with current operations	LB
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# Contents

POLICY REVIEW RECORD .....	2
GLOSSARY AND DEFINITIONS .....	5
1.0 GENERAL.....	6
1.1 Company Profile .....	6
1.2 Purpose of this Manual .....	6
1.3 Scope of EMS.....	6
2.0 POLICY .....	7
3.0 ORGANISATION .....	8
3.1 Organisation Chart.....	8
3.2 Authority & Responsibilities .....	8
3.2.1 Managing Director.....	10
3.2.2 WAMITAB Officer .....	10
3.2.3 Health and Safety Officer and DEMR .....	10
3.2.4 Contracts Manager.....	10
3.2.5 Business Development Manager.....	10
3.2.6 Stock Control .....	11
3.2.7 Administrative Support .....	11
3.2.8 Site Foreman .....	11
3.2.9 Site Supervisors and Site Labour .....	11
3.2.10 Health and Safety Manager and.....	11
4.0 ENVIRONMENTAL MANAGEMENT SYSTEM REQUIREMENTS.....	12
4.1 Environmental Management System Documents.....	12
4.2 Environmental Policy.....	13
4.3 Planning .....	13
4.3.1 Environmental Aspects.....	13
4.3.2 Legal and Other Requirements.....	13
4.3.4 Objectives, Targets and Programme(s) .....	14
4.4 Implementation and Operation.....	14
4.4.1 Resources, Roles, Responsibility and Authority.....	14
4.4.2 Competence, Training and Awareness .....	15
4.4.3 Operations .....	15
4.4.4 Maintenance Considerations .....	16
4.4.5 Accidents and Incidents.....	16
4.4.6 Risks of Pollution and Control .....	16

4.4.7	Communication and Complaints Procedure .....	17
4.4.8	Documentation.....	18
4.4.9	Control of Documents .....	18
4.4.10	Operational Control.....	19
4.4.11	Emergency Preparedness and Response.....	19
4.5	Checking .....	19
4.5.1	Monitoring and Measurement .....	19
4.5.2	Evaluation of Compliance .....	19
4.5.3	Nonconformity, Corrective Action and Preventive Action .....	20
4.5.4	Closure.....	20
4.5.5	Control of Records.....	20
4.5.6	Internal Audit.....	20
4.6	Management Review.....	21
Appendix A	.....	23
Appendix B	.....	24
CONTACT LIST	.....	25

## GLOSSARY AND DEFINITIONS

<b>Auditor</b>	Person with the competence to conduct an audit
<b>Continual improvement</b>	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organization's environmental policy.
<b>Corrective action</b>	Action to eliminate the cause of a detected nonconformity.
<b>Document</b>	Information and its supporting media
<b>Environment</b>	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
<b>Environmental aspect (EA)</b>	Elements of an organization's activities or products or services that can interact with the environment.
<b>Environmental impact</b>	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.
<b>Environmental management system (EMS)</b>	Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.
<b>Environmental objective</b>	Overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve.
<b>Environmental performance</b>	Measurable results of an organization's management of its environmental aspects.
<b>Environmental policy</b>	Overall intentions and directions of an organization related to its environmental performance as formally expressed by top management.
<b>Environmental target</b>	Detailed performance requirement applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
<b>Interested party</b>	Person or group concerned with or affected by the environmental performance of an organization.
<b>Internal audit</b>	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization are fulfilled.
<b>Nonconformity</b>	Non-fulfilment of a requirement.
<b>Organization</b>	BESPOKE RECYCLING SOLUTIONS LTD
<b>Preventive action</b>	Action to eliminate the cause of a potential nonconformity.
<b>Prevention of pollution</b>	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental impacts.
<b>Procedure</b>	Specified way to carry out an activity or a process.
<b>Record</b>	Document stating results achieved or providing evidence of activities performed.

## **1.0 GENERAL**

### **1.1 Company Profile**

Bespoke Recycling Solutions Ltd is a waste processing and management company which operates under the SIC Code 38320, operating a waste processing facility at South Humberside Industrial Estate, Grimsby, DN31 2TG. The facility will be regulated in accordance with the requirements of the Environmental Permitting Regulations, under the conditions of the Environmental Permit Standard Rules SR2015 No. 6, once determined.

The proposed facility will process and transfer up to 75,000 tonnes of non-hazardous waste per annum which comprises principally of mixed plastic waste sorted into four categories of polymers: High Density (HD) Nat; High Density (HD) Jazz; PET Jazz; and PET Nat; as well as ferrous and non-ferrous metals. In addition, a small volume of RDF processed into SRF will be processed, and a fraction of end of life tyres may be accepted for bale and export.

Four personnel comprise the founding team: Peter Teasdale, with 35+ years' experience in large industrial facility operational management; Luke Boden (WAMITAB), with 15 years' industrial facility mechanical and industry-specific roles and personal network; and Madeleine Teasdale BSc with 6 years' management in industrial waste and energy projects.

### **1.2 Purpose of this Manual**

This Manual defines the Environmental Management System (EMS) of Bespoke Recycling's activities and contains:

- a) The Environmental Policy;
- b) Statements of responsibility and authority;
- c) An overview of the company's environmental procedures and controls;
- d) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- e) The appointment of the Environmental Management Representative (EMR); and
- f) The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this EMS meets all *ISO 14001:2004* requirements and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

### **1.3 Scope of EMS**

The scope of the EMS applies to the storage, handling and disposal related to the waste processing and recycling services provided / undertaken by Bespoke Recycling at Estate Road 5, South Humberside Industrial Estate, Grimsby, DN31 2TG.

## 2.0 POLICY

### Environmental Policy

Bespoke Recycling Solutions Ltd undertakes the management, processing and recovery of mixed waste in both the public and private sectors.

Protecting the environment is the responsibility of all staff members in the organization. Bespoke is committed to sustainable waste processing and minimising any adverse impact on the environment resulting from our business activities.

We are committed to delivering services with minimal impact to the environment through the following principles:

- Compliance with the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011.
- Focus on prevention of pollution, waste minimization and resource conservation as critical considerations within our core management processes.
- Compliance with applicable legal requirements and other requirements to which the Company subscribes which relate to its environmental aspects.
- Regular performance reviews to ensure that environmental objectives and the requirements of Interested Parties are met.
- Provision of staff training to ensure understanding, implementation and development of these principles throughout our business.
- Continual improvement

All staff will follow the requirements of the Environmental Management System in the performance of their tasks and will ensure this policy is supported and maintained. This policy will be communicated to our customers, suppliers, and subcontractors. It will also be made available to the public whenever requested.

Endorsed by

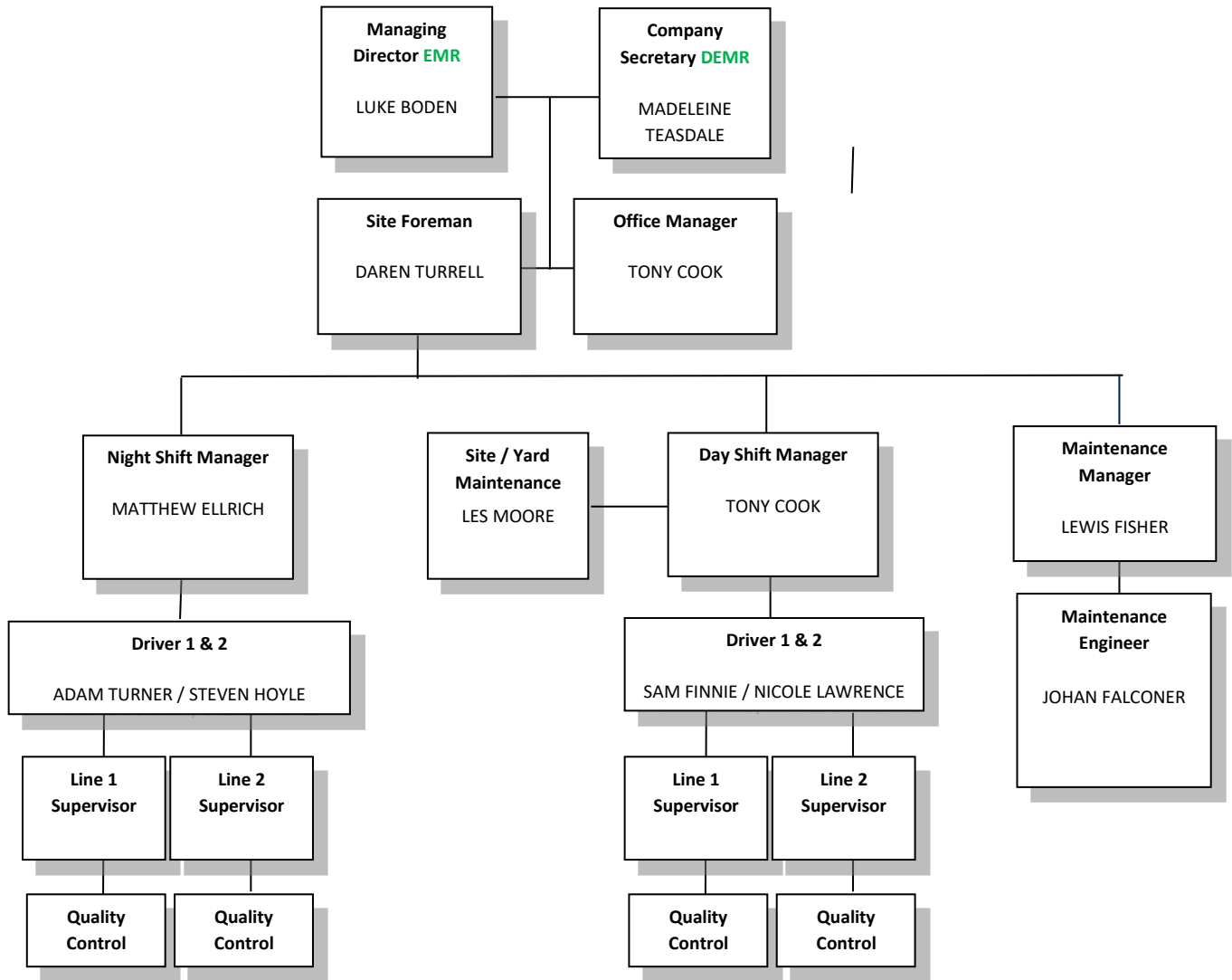
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*Luke Boden, Managing Director*

Date:

### 3.0 ORGANISATION

#### 3.1 Organisation Chart





## **3.2 Authority & Responsibilities**

All staff are allocated with authority to perform their allocated responsibilities. The following provides a summary of the principal responsibilities of each job role, and these are clarified in greater detail within the Operating Procedures.

All staff share the authority and responsibility of identifying non-compliances or possible improvements and recording these instances such that corrective action can be taken, both to rectify the immediate situation and to prevent recurrence.

The Managing Director continually reviews the company's resources to ensure that adequate staff, equipment and materials are available to meet customer requirements.

### 3.2.1 Managing Director

- Approval of the Quality Assurance System
- Management Review
- Supplier Selection & Purchasing
- Contract Management & Control
- Estimating

### 3.2.2 WAMITAB Officer

- Internal Audit
- Process Control and Warehouse Operations
- Resolution of Quality Assurance System Discrepancies
- Control & Maintenance of the Quality Assurance System
- Documentation & Change Control (Quality System Documents)
- Supplier Selection and Purchasing
- Training
- ensuring that EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard;
- ensuring that sufficient resources are allocated for the proper implementation of the environmental policy and the EMS;
- regularly reviewing the policy and the effectiveness of the EMS and ensuring that the necessary changes are made.
- EMR is also the Chairman of the EMS Committee and has the responsibility and authority for:
- leading the EMS Committee to establish and implement the EMS according to ISO 14001 standard, and monitoring the performance of the EMS;
- coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained;
- handling and investigating nonconformity and ensuring corrective and preventive action has been taken to mitigate any impacts caused;
- reporting on the performance of the EMS to the top management for review and as a basis for improvement of the EMS.
- The EMR, the DEMR, the EMS Committee and (*Top Management*) shall undertake the EMS management review *annually* to ensure top management commitment and integration of the EMS with business strategies for its implementation and continual improvement.

### 3.2.3 Health and Safety Officer and DEMR

- Health and Safety Documentation Review
- Inspections
- Training
- PPE designations
- assisting the EMR to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard;
- assuming the responsibility and action of the EMR when the EMR is unavailable.

### 3.2.4 Contracts Manager

- Ensuring continued throughput (offtake) of waste products, in line with waste turnover policy

### 3.2.5 Business Development Manager

- Sales

- Estimating
- New Product Identification and Evaluation

### **3.2.6 Stock Control**

- Control of Stock
- Replenishment Recommendation
- Protection and Preservation of Stock
- Receiving Inspection
- Packaging and Despatch

### **3.2.7 Administrative Support**

- Management & Co-ordination of Contract Support Functions
- Order Processing
- Estimating
- Control of Contract Documentation

### **3.2.8 Site Foreman**

- Planning and Co-ordination
- Control of Production and Measuring Equipment
- Maintenance of Support Stores
- Processing of Sales Orders
- Purchasing

### **3.2.9 Site Supervisors and Site Labour**

- Planning and Performance of equipment
- Technical and Operational Assistance
- Repairs, Testing and Maintenance Activities
- Control of Equipment and Materials Allocated

### **3.2.10 Health and Safety Manager and**

- Maintaining onsite H&S
- Housekeeping
- PPE Designations

## 4.0 ENVIRONMENTAL MANAGEMENT SYSTEM REQUIREMENTS

The EMS of Bespoke Recycling is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS is established in accordance with *ISO 14001:2004* and is described in this section. Procedures for each component is given in the relevant Environmental Procedures (EPs) listed in Appendix A.

### 4.1 Environmental Management System Documents

The purposes of these EMS documents are as follows:

<b>Environmental Policy</b>	Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements and pollution prevention.
<b>Environmental Management System Manual (EMS Manual)</b>	Describes the environmental management system and outlines how the requirements of the International Standard (ISO 14001) are achieved. A cross-reference of the ISO 14001 clauses to the sections of this Manual is listed in Appendix A.
<b>Objective(s) *</b>	The overall environmental goals that Bespoke Recycling set to achieve.
<b>Target(s) *</b>	The set of measurable performance requirements that Bespoke Recycling establishes to achieve the objectives.
<b>Programme(s) *</b>	The programme and schedule which Bespoke Recycling implements to achieve the objectives and targets.
<b>Environmental Procedures (EPs)</b>	Define the roles, responsibilities, and actions to be taken to ensure that activities are performed, and the EMS implemented in accordance with the environmental policy and the requirements of ISO 14001. A cross- reference of the ISO 14001 clauses to the EPs is listed in Appendix A.
<b>Register of Environmental Aspects</b>	Compiles the environmental aspects that are derived from the activities and services of Bespoke Recycling. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects.
<b>Register of Legal and Other Requirements</b>	Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to Bespoke Recycling.
<b>Environmental Instructions (EIs)</b>	Describe which and how activities should be performed to manage significant environmental aspects and to achieve the EMS ISO 14001 requirements.
<b>Environmental Forms/Records</b>	Record information for the audit trail and the assessment of environmental conditions and performance.

\* Objectives and Targets, and associated Programmes are provided as a single document.

## 4.2 Environmental Policy

(ISO 14001 Standard Clause 4.2)

The environmental policy of Bespoke Recycling is included in Section 2 of this document. It outlines the environmental commitments of Bespoke Recycling with respect to its operations, activities, and overall environmental performance. During the development of this policy, the appropriateness to the nature, scale and environmental impacts of Bespoke Recycling activities, products and services has been considered. The policy is endorsed by Luke Boden (Managing Director) and the policy shall be reviewed during the management review meeting.

The policy shall stipulate the commitments of Bespoke Recycling to continually improve its environmental management and prevention of pollution. Bespoke Recycling is also committed to comply with applicable legal requirements and other requirements to which Bespoke Recycling subscribes, which relate to its environmental aspects. The environmental policy shall provide a framework for setting and reviewing objectives and targets, and must be maintained, implemented and communicated to all employees of Bespoke Recycling and its contractors.

This policy shall be available to the public.

## 4.3 Planning

Bespoke Recycling shall follow a “plan-do-check-act” process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of Bespoke Recycling’s Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with Bespoke Recycling’s environmental policy, Bespoke Recycling’s objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

### 4.3.1 Environmental Aspects

(ISO 14001 Standard Clause 4.3.1)

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, Bespoke Recycling shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services. These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

Bespoke Recycling shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritized for improvements.

Bespoke Recycling shall keep this information up to date.

### 4.3.2 Legal and Other Requirements

(ISO 14001 Standard Clause 4.3.2)

Bespoke Recycling shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company’s environmental aspects

Bespoke Recycling shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

Bespoke Recycling shall keep this information up to date.

Relevant procedure: [EP-02 Review of Legal and Other Requirements](#)

#### **4.3.4 Objectives, Targets and Programme(s)**

(ISO 14001 Standard Clause 4.3.3)

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within Bespoke Recycling Solutions. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, Bespoke Recycling shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

The senior management team shall approve the objectives, targets and programmes proposed with regard to the EMS before implementation. The Environmental Management Representative (EMR) shall ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by an EMS Committee every 6 months. The EMR shall lead the EMS Committee in revising the objectives, targets and programmes as necessary.

Bespoke Recycling shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EMR shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

The EMR shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

## **4.4 Implementation and Operation**

The implementation of the EMS requires Bespoke Recycling to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

### **4.4.1 Resources, Roles, Responsibility and Authority**

(ISO 14001 Standard Clause 4.4.1)

Top management of Bespoke Recycling shall commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

BESPOKE RECYCLING has appointed Luke Boden as the Environmental Management Representative (EMR), and Madeleine Teasdale as the Deputy Environmental Management Representative (DEMUR) for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

#### 4.4.2 Competence, Training and Awareness

(ISO 14001 Standard Clause 4.4.2)

Bespoke Recycling shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

Bespoke Recycling will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

Bespoke Recycling shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental management system;
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;
- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures.

#### 4.4.3 Operations

Bespoke Recycling undertakes three main operations:

- Manual Sorting of plastics
- Shredding of plastics
- Baling of metals and plastics

Manual sorting of plastics involves accepting loose and baled waste product, before it is loaded onto a conveyor via a JCB bucket, and passed along a manual sorting line, where personnel identify and recover various grades of polymers into allocated bins. The risk of pollution here is predominantly in the litter that escapes the processing areas either through contact with vehicles or through air movement. The continuous movement of waste also has the potential to create dust, as well as any liquids trapped in vessels have the potential to emit small volumes of liquids, though the pre-receipt processes (sorting and crushing) tend to eliminate much of this. The noise from the sorting line process has been recorded at sub-~~X~~ decibels, and as such would not be heard by local businesses or surrounding residential areas. Low organic content material and a short stock turnover reduces the incidence of odour and vermin.

The shredding of residual plastics to create an SRF fuel involves a process of a conveyor transferring end-of-line product directly into the onsite shredder, which then automatically fills an adjacent bay. The predominant environmental concern for consideration here is the creation of dust, and noise generated by the equipment. The shredding of dry material will generate dust

in the vicinity, which will be contained within the building. Regular housekeeping will be implemented for the purpose of controlling the levels of dust within the building to ensure it does not escape and contaminate any other environments or pose an excessive fire risk. The shredder is recorded at X decibels external to the building with doors closed and at X decibels external to the building with doors open.

Baling of metals and plastics involves the loading of pre-sorted product into the baler for compression and binding, ready for collection from site. The process itself is low risk with regards to emissions of any sort, other than the noise emissions with a decibel reading of X, and the process of loading and unloading the baler, which creates litter spread from small amounts which has escaped from the loading bucket, or fall out from the bales removed for loading by the pick and carry.

#### **4.4.4 Maintenance Considerations**

Bespoke Recycling currently has two operational vehicles on site (excluding personal vehicles); the Merlo and the JCB. These, and the static onsite equipment are maintained regularly in accordance with their operations manuals. Both maintenance and lack of maintenance can create emissions, so must be carried out with regard to minimizing the risk of pollution.

Leaks may occur where fuel and oil is refilled, or where faults occur within the machine. Dedicated spill kits are located within the office, and all personnel are trained to deal with spillages onsite on induction.

Vehicles and equipment must be maintained to ensure continued maximum efficiency is obtained. Low efficiencies lead to higher emissions of environmentally damaging fumes. Breakdowns may also lead to the build-up or stagnation of waste on site so should be minimized through regular maintenance. Records of maintenance must be kept for three years.

#### **4.4.5 Accidents and Incidents**

Spillages through broken or leaking machinery will be managed in the same way as any others, through immediate use of a spill kit. The origin of all leaks must be traced and identified and recorded.

Breakdowns in machinery which may lead to the stagnation or accumulation of waste must be reported immediately, and stock turnover with inbound loads assessed for its potential to cause non-compliances. Where non-compliance may occur, this will trigger a management meeting to assess the issue and establish a process for averting such an occurrence with minimal disturbance to the customer base.

#### **4.4.6 Risks of Pollution and Control**

**Litter** – Litter poses a significant risk to the immediate environment due to the nature of the processing and handling of materials on site. This may be transferred airborne or on tyres of vehicles. The litter is controlled through use of a litter fence at the rear of the property where vehicle movements are restricted to, parallel to the doors to the waste storage area. Doors are closed when not in use, and regular cleaning schedules in the waste storage and processing areas are in place.

**Rodents / Vermin** – Due to the low organic content of the material, rodents are not prolific onsite. The majority of vermin is found in the flies and beetles which occur more frequently in the



summer months. The flies are controlled through spraying inbound loads, electric fly killers in areas of high personnel usage, and ensuring stock turnover does not allow for active breeding sites for the insects.

**Dust** – Dust occurs where waste is shredded, or waste stored for extended periods are reprocessed. Dust from the shredding process is controlled by keeping doors in the shredding area closed when the equipment is in use. The area is cleaned regularly to prevent build-up of dust escaping the building on tyres or through the air. The build-up of dust in the waste piles will be managed by using a first-in first-out policy with regards to waste movement.

**Odour** – The first-in first-out movement of waste, as well as low organic content (inspected on the arrival of all loads), will help to manage odour. The doors will also be kept closed when not in use. Guillotine doors and screens are to be implemented when the company can reasonably afford the outlay. The local area is industrial, majority fish processing, so the odour of the MRF is not noticeable in the locality.

**Noise** –The area is industrial alongside a main road with no residential houses nearby. The equipment is all located indoors, with the doors kept shut when not in use. Trees provide some protection on the operational side to the shed. Operational hours are, at maximum, 6am to 10pm, when the double shift (changeover at 2pm) is in place. No vehicles or machinery will be operational between 10pm and 6am.

**Leachate** – The building and doors have a 10 cm high containment bund (access is via ramps). This will prevent potentially contaminated water entering the offsite drainage system. The sump and external drainage system may be isolated via a penstock valve to prevent run-off potentially entering the offsite drainage system. The capacity of the building containment is 457,400 litres, which will easily hold the 436,680 litres of any fire water which would be produced in the worst-case scenario of a fire within the largest pile which is 364m<sup>3</sup>. In addition, the sump would capture any external run-off. The fire water will be removed via tanker from the building and sump which will transport the water offsite to an appropriate treatment facility. Waste must be stored indoors to prevent rainwater leachate. Indoor liquid emissions from bottled products do not tend to produce sufficient volume to leave the loading area.

#### **4.4.7 Communication and Complaints Procedure**

(ISO 14001 Standard Clause 4.4.3)

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice board or is published on the intranet or newsletters.

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of Bespoke Recycling shall inform their Function / Departmental Manager. The designated member of EMS Committee representing each division shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication and complaints, the environmental policy is available at the company office. All internal and external enquiries / complaints / communications shall be discussed and reviewed during the EMS Committee meeting and the decision shall be recorded on meeting minutes.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g. publish environmental report.

#### **4.4.8 Documentation**

(ISO 14001 Standard Clause 4.4.4)

The Environmental Management System documentation encompasses four levels as described below:

The first level is the *Environmental Management System Manual* (this document) which includes Bespoke Recycling's environmental policy (specifying the principal objectives and environmental commitments of BESPOKE RECYCLING), and a broad description of how Bespoke Recycling addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between Bespoke Recycling's EMS and the ISO 14001 Standard. An individual document of *Objectives, Targets and Programmes* is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continual improvement in environmental performance.

The second level is the *Environmental Procedures (EPs)*, which include all procedures that Bespoke Recycling shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when. Appendix A shows the relationship between various environmental procedures and the ISO 14001 Standard clauses. Register of Environmental Aspects, and Register of Legal and Other Requirements are derived from the procedures and act as the foundation of the EMS which the company subscribed to.

The third level is the *Environmental Instructions (EIs)*, which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with Bespoke Recycling's operations and activities.

The fourth level is *Environmental Records*, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

#### **4.4.9 Control of Documents**

(ISO 14001 Standard Clause 4.4.5)

The essences of EMS documentation controls are:

- 4.4.9.1 they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- 4.4.9.2 that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- 4.4.9.3 that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- 4.4.9.4 obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- 4.4.9.5 any obsolete documents retained for legal and / or knowledge preservation

purposes shall be suitably identified.

Bespoke Recycling shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. BESPOKE RECYCLING shall establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

#### **4.4.10 Operational Control**

(ISO 14001 Standard Clause 4.4.6)

Bespoke Recycling shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

Bespoke Recycling shall ensure that all operations and activities, carried out by Bespoke Recycling's employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. Bespoke Recycling shall influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

#### **4.4.11 Emergency Preparedness and Response**

(ISO 14001 Standard Clause 4.4.7)

Bespoke Recycling shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

Bespoke Recycling shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

Bespoke Recycling shall also periodically test the procedure and the preparedness where practicable.

### **4.5 Checking**

While implementing the EMS, Bespoke Recycling shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for management review.

#### **4.5.1 Monitoring and Measurement**

(ISO 14001 Standard Clause 4.5.1)

Bespoke Recycling shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

#### **4.5.2 Evaluation of Compliance**

(ISO 14001 Standard Clause 4.5.2)

To meet the company's commitment to compliance, Bespoke Recycling shall regularly monitor

and evaluate the compliance status of the applicable environmental legal requirements (section 4.5.2.1) and other requirements (section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

#### **4.5.3 Nonconformity, Corrective Action and Preventive Action**

(ISO 14001 Standard Clause 4.5.3)

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, Bespoke Recycling shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- 4.5.3.1 handle and investigate nonconformity;
- 4.5.3.2 take action to mitigate the impacts caused;
- 4.5.3.3 initiate and complete corrective and preventive actions;
- 4.5.3.4 ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- 4.5.3.5 record the results of corrective and prevention action taken;
- 4.5.3.6 review the effectiveness of corrective action and preventive action taken;
- 4.5.3.7 implement and record any changes in the documented procedures resulting from corrective and preventive action; and Bespoke Recycling shall also ensure that any necessary changes are made to environmental management documentation.

#### **4.5.4 Closure**

In such instances where closure may occur, the

#### **4.5.5 Control of Records**

(ISO 14001 Standard Clause 4.5.4)

Records shall be maintained to keep track of Bespoke Recycling's environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard, and the results achieved.

Bespoke Recycling shall establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

#### **4.5.6 Internal Audit**

(ISO 14001 Standard Clause 4.5.5)

Bespoke Recycling shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental management system audits to:

- a) determine whether or not the environmental management system:
  - conforms to planned arrangements for environmental management including the requirements of ISO 14001; and

- has been properly implemented and maintained;
- b) provide audit results and information for management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

Bespoke Recycling shall conduct EMS audits on a regular basis. Timely site environmental audits are required to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis.

#### 4.6 Management Review

(ISO 14001 Standard Clause 4.6)

The “plan-do-check-act” cycle shall require the top management of Bespoke Recycling to act and review the environmental management system periodically to ensure its suitability, adequacy and effectiveness.

Before the Review, the EMR shall schedule for the management review and inform all the participants and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The senior management team, EMR and DEMR together with the EMS Committee shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, the processing and recovery of waste materials, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes;
- review of legal compliance and compliance with other requirements (including contractor compliance on Bespoke Recycling’s activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;
- review of nonconformities and the status of corrective/preventive actions;
- communications from external interested parties, including complaints;
- areas for improvement with respect to environmental performance;
- adequacy of emergency preparedness and response;
- changing circumstances, including developments in legal and other requirements related to its environmental aspects,
- identify the need for modification of the existing EMS in light of the above items, and
- follow-up action from previous management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in Bespoke Recycling’s environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record. Maintenance of the records shall be in accordance with [EP-08](#).



## Appendix A

Cross Reference of ISO 14001 Requirements\* and Sections in the EMS Manual and Environmental Procedures.

ISO Clause	EMS Manual Section No.
4.1 General Requirements	4.1
4.2 Environmental Policy	4.2.
4.3 Planning	4.3
4.3.1 Environmental Aspects	4.3.1
4.3.2 Legal and Other Requirements	4.3.2
4.3.3 Objectives, Targets and Programme(s)	4.3.3
4.4 Implementation and Operation	4.4
4.4.1 Resources, Roles, Responsibility and Authority	4.4.1
4.4.2 Competence, Training, and Awareness	4.4.2
4.4.3 Communication	4.4.3
4.4.4 Documentation	4.4.4
4.4.5 Control of Documents	4.4.5
4.4.6 Operational Control	4.4.6
4.4.7 Emergency Preparedness and Response	4.4.7
4.5 Checking	4.5
4.5.1 Monitoring and Measurement	4.5.1
4.5.2 Evaluation of Compliance	4.5.2
4.5.3 Nonconformity, Corrective Action and Preventive Action	4.5.3
4.5.4 Control of Records	4.5.4
4.5.5 Internal Audit	4.5.5
4.6 Management Review	4.6

\* ISO 14001:2004 is referred.

## Appendix B

### Controlled Document List

<b>Document No.</b>	<b>Document/Form Name</b>
CP-01	Environmental Policy
O&T-YYYY	Objectives, Targets and Programmes
EAR-01	Register of Environmental Aspects
LR-01	Register of Legal and Other Requirements
EM-01	Environmental Management System Manual
EP-02	Review of Legal and Other Requirements



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