

ENVIRONMENTAL BRIEFING

Legal Compliance

Introduction

During this year's round of external ISO 14001 audits several **NON-CONFORMANCES** and **OBSERVATIONS** were raised for breaches to conditions of our environmental permits, e.g., PPC Permits, Trade Effluent Discharge Consents & Surface Water Discharge Consents, as well as broader legal compliance issues such as with Waste and Oil Storage Regulations. The Sustainability Department have also picked up on these issues during our own internal audits. We have all faced a great deal of disruption to our normal working lives over recent years because of COVID, the Breedon divestment and subsequent management reorganisations, which have all been unavoidable and mostly unexpected. However, we need to remind all areas of the business that regardless of these changes we must remain **LEGALLY COMPLIANT** with our licences to operate as well as all other legal requirements. This will allow us to avoid damage to the environment, fines and damage to our reputation and customer confidence.

Examples of Issues

1. A non-conformity raised by our external auditors - daily dust, maintenance or other environmental checks not being carried out either partially or not at all. It is essential that environmental permit checks are carried out on time and as required. If we had an environmental incident or received a complaint at a site where no permit checks were completed it is much more likely the regulator would take enforcement action against us as we would not be able to prove we were otherwise complying with our permit.
2. Completing PPC Permit checks incorrectly. It is important not to assume everything is working as it should without physically checking. There was evidence from audits which showed the daily dust checks were being marked as OK, when clearly there were issues.
3. Contamination in hazardous waste bins. It is a legal requirement to ensure waste is properly segregated. Audits identified cases where non-hazardous waste was found in hazardous waste bins. This issue also has a cost implication as it much more expensive to dispose of hazardous waste. Hazardous waste in a non-hazardous waste bin is also illegal.
4. Another non-conformity raised by our auditors - it is a legal requirement that hazardous waste bins are emptied at least every 12 months. There was evidence at sites where hazardous waste bins had not been emptied for several years.
5. Changes to plant layout or structure before authorities have been notified. It is essential that proposed changes to a plants operation e.g., new silos, new aggregate bays, new fuel type (Asphalt), meters, or any new equipment are notified to regulators and permission granted to ensure we remain legally compliant.
6. Housekeeping – ensure old oil or admixture drums (empty and full) are sent for disposal and not allowed to build up on sites where they can accumulate for years. It is also essential that oil and chemicals are stored in a way that is compliant with the oil storage regulations – i.e., on or in an adequate bund.



Blocked PRD – clearly in breach of permit condition but recorded as “OK”



Poor compliance with oil storage regulations and bad housekeeping

Key Points

- Ensure sites are compliant with environmental permit conditions including in relation to dust checks and potential emissions.
- Hazardous waste must not be contaminated with non-hazardous waste (or vice versa) and bins/boxes need to be emptied at least once per year.
- If there are changes to plants, ensure the regulator is notified so permits/consents accurately describe our operations.
- Housekeeping – don't let oil or admixture drums (full or empty) build up on site or remain for periods longer than 12 months. Ensure all drums and bulk tanks are properly banded.