

Environmental Code of Practice for Subcontractors

August 2021



The Tilbury Douglas approach

We will:

- Set out environmental aims, objectives and targets.
- Communicate our environmental policies.
- Identify all significant environmental hazards for the project, with specialist surveys if required.
- Prepare an Environmental Management Plan.
- Carry out project-level Environmental Risk Assessments.
- Prepare an Environmental Incident and Emergency Plan.
- Nominate members of the site management team responsible for environmental management.
- Monitor your performance against the environmental requirements of the project.

We expect you to:

- Familiarise yourselves and comply with our environmental policies.
- Attend a Pre-start Safety and Environmental Induction Meeting to discuss environmental targets and the management of potential environmental impacts.
- Plan your operations in conjunction with Tilbury Douglas to minimise the environmental impacts.
- Assess the environmental hazards associated specifically with your operations and detail controls in your own written risk assessments and method statements.
- Ask questions and seek advice.
- Report any issues or incidents to us immediately.

On-site actions:

- Brief your workforce to ensure that they fully understand the environmental requirements of the activity prior to starting work.
- Ensure that your workforce fully understand environmental risk assessments and control measures defined within the method statements.

Avoiding Pollution

It is Tilbury Douglas's aim to avoid pollution of ground, drains or watercourses from contaminated water or chemicals.

We will:

- Have a Water Management Plan explaining how we manage and dispose of water. This may have been agreed with the Environmental Regulator.
- Provide you with a copy of our Water Management Plan and brief it to you before you start work.
- Set up the site to minimise the likelihood of water contamination.
- Operate a Permit to Pump and Discharge regime.

We expect you to:

- Minimise the wastewater you produce and take measures to prevent it becoming contaminated.
- Only pump or discharge liquids with a valid permit.
- Use less harmful products such as bio-oils, HVO, water-based paint etc where possible
- Comply with all permit conditions and constraints.
- Provide suitable water treatment facilities such as recirculating concrete washout or use the facilities provided.
- Store any chemical you bring to site securely, have a suitable spill kit and trained staff to deal with spillage and dispose of contaminated materials legally.
- Use absorbent secondary containment (i.e. plant nappies/enviropads). Traditional metal drip trays are not acceptable.

On-site actions:

- Comply with all instructions and signage.
- Collect the contaminated water you produce and do not discharge into the ground or drainage system unless you have been formally told that is permissible.
- Stop work immediately and inform the Tilbury Douglas Site Manager if:
 - You spill any chemicals onto ground, into a drain or waterbody.
 - Your work is producing so much wastewater that it cannot be processed properly by the system in place.

Managing Waste

It is Tilbury Douglas's aim to implement efficient construction methods to minimise use of resources and eliminate waste.

We will:

- Implement a Site Waste Management Plan to identify waste avoidance or waste minimisation options, targets, and to record project waste.
- Inform you of applicable waste management arrangements and targets.
- Ensure that authorisations for on-site treatment or reuse are obtained.

We expect you to:

- Provide information regarding expected waste types and volumes.
- Inform us when materials, waste or soils are removed from site.
- Provide copies of duty of care documentation for all waste you dispose of directly, including:
 - Waste transfer notes and hazardous waste consignment notes
 - Waste carriers' licences
 - Authorisation for treatment, storage or disposal (e.g. environmental permits, waste exemptions or waste management licences).
- Use take back schemes where possible.

On-site actions:

- Comply with all instructions and signage.
- Minimise waste by not over-ordering and careful storage, handling and work.
- Ensure that your staff segregate waste streams as required by site arrangements. As a minimum, plasterboard, hazardous waste, COSHH waste and invasive species must be segregated.
- Items from home must not be disposed of into site waste facilities.
- Ensure waste is stored securely to prevent pollution or harm to health; covered skips are required for plasterboard and lightweight waste.

Protecting Ecology

It is Tilbury Douglas's aim to avoid impact on habitat, plants or animals which may be affected by our work where possible, and to minimise impacts where they cannot be avoided. Tilbury Douglas will aim to find opportunities for biodiversity enhancement on every project.

We will:

- Brief you on ecological planning and licence conditions and constraints.
- Ensure you know who is responsible for managing ecological issues in the site team.
- Inform you of ecologically sensitive areas and the authorisation process to gain access.

We expect you to:

- Ensure that all your staff are aware of the limitations under which they have to work.
- Comply with all licence conditions and constraints.

On-site actions:

- Comply with all instructions and signage.
- Store materials or plant away from trees, hedgerows or watercourses.
- Do not attach signage or any other items to the trees in any way.
- Stop work immediately and inform the Tilbury Douglas Site Manager if any member of staff:
 - Finds a protected species, such as great crested newts, white-clawed crayfish, water vole, bats.
 - Finds a nesting bird.
 - Finds an invasive plant, such as Japanese Knotweed or Himalayan Balsam.
 - Observes a breach of planning or license conditions

Energy and Water Use

It is Tilbury Douglas's aim to use site energy and water as efficiently as possible.

We will:

- Measure the water and energy (diesel, gas and electricity) used on all sites.
- Measure the total carbon footprint of the work on some schemes. (Highways England and some other clients require it).

We expect you to:

- Use local suppliers when economically viable in order to reduce carbon emissions from deliveries.
- Use energy efficient and low water use plant and equipment. On sites within low emissions or air quality controlled area, you must supply plant and equipment that complies with emission limits.
- Promote sharing of transport or use of public transport.
- Provide information such as material's carbon footprint and travel distances where requested.
- Use electric tools and plant where possible.

On-site actions:

- Switch off plant, equipment, taps and hoses that are not in use.
- Minimise use of energy and water by:
 - Utilising thermostatic controls and time switches for heaters.
 - Ensuring rooms are only heated or lit when required.
 - Ensuring external doors and windows are closed to keep heat in.
 - Reporting leaking hoses and dripping taps to the Tilbury Douglas Site Manager.
 - Recycling and reusing water where possible.

Materials Management

It is possible to improve the sustainability of a project by selection and careful management of materials.

We will:

- Provide you with sufficient storage space for the materials you bring to site.
- Review product declarations and delivery notes to ensure that the material is as specified and meets sustainability standards.

We expect you to:

- Provide recycled aggregate produced in accordance with the Quality Protocol for Aggregates or the SEPA Guidance WST-G-033 Recycled Aggregates from Inert Waste, along with documentary evidence.
- Only use new timber from FSC or PEFC sources for both temporary and permanent work. Reclaimed and recycled timber is an acceptable alternative.
- Advise us where new, more sustainable alternative materials could be used.
- Provide us with the sustainability credentials for materials (e.g. BES6001) or for production process (e.g. ISO 14001), where required as evidence for BREEAM or another sustainability standard.

On-site actions:

- Store materials safely and tidily, away from trees, hedges, watercourses or moving vehicles and handle it with care.
- Order only what is required, check it on arrival, use it efficiently and minimise wastage.
- Provide Tilbury Douglas with sustainable sourcing documentation.

Contaminated Land

Tilbury Douglas aims to restore land, where possible, and avoid spreading contamination.

We will:

- Carry out due diligence and establish the level of risk and nature of any potential contaminants.
- Develop a Contaminated Land Management Plan and obtain regulator authorisation where required.
- Develop a Materials Management Plan to control movements and placement of excavated material.
- Brief you on known or potential contaminated ground, specific controls and health and safety precautions for working in or around contaminated areas.

We expect you to:

- Incorporate controls into your method statement where relevant.
- Follow all controls specified for working in contaminated land or implementing a Materials Management Plan. These may include 'quarantined' storage/disposal areas, exclusion zones and tracking of movements/placement.
- Ensure that all site personnel have received relevant briefings on the identification and potential for contamination.
- Comply with 'duty of care' requirements for any contaminated material required to be removed from site for disposal.

On-site actions:

- Stop work and report any previously unidentified contamination encountered.

Emissions to air

Tilbury Douglas aims to avoid nuisance and contributing to poor local and global air quality by minimising emissions to air.

We will:

- Assess activities and identify where dust, fumes and exhaust emissions may be generated.
- Develop an Air Quality Management Plan where significant impacts are likely.
- Implement air quality monitoring where there are potential impacts on sensitive receptors.
- Brief you on specific controls to minimise emissions to air.

We expect you to:

- Implement extraction or suppression controls for activities likely to generate dust, such as demolition, cutting or grinding.
- Ensure that your equipment and plant are properly maintained and switched off when not in use. Any that are generating visible black exhaust fumes are to be removed from site.
- Ensure that lids are replaced, and containers stored safely for fuel or chemicals likely to emit fumes, such as petrol or solvents.
- Demonstrate your competence and qualifications for maintenance, decommissioning or removal of equipment containing refrigerant gases.

On-site actions:

- No materials or waste is to be burnt on site.

Be a good neighbour

Tilbury Douglas aims to act in a considerate manner by minimising nuisance and disruption to neighbours.

We will:

- Identify stakeholders and sensitive receptors which could be impacted by construction activities.
- Nominate a member of Tilbury Douglas team to lead on public liaison.
- Brief you on specific controls to minimise potential nuisance, such as working hours and restrictions on location or use of equipment.
- Measure our projects against industry best practice by registering with the Considerate Constructors Scheme where required by our client.

We expect you to:

- Implement suitable methods or mitigation measures to avoid nuisance.
- Minimise the nuisance caused by traffic, including deliveries (timing, routing and size), dust, mud on the road and parking.
- Create an image of which the industry can be proud, helping to keep the site perimeter, offices and welfare facilities in a clean, tidy and well-presented manner.
- Carry out the work with care and consideration for the public.

On-site actions:

- All staff are to be appropriately dressed and temper their language and behaviour at all times.
- Radios are not permitted on Tilbury Douglas sites.
- Immediately refer queries or complaints to the Tilbury Douglas Project Public Liaison Officer or Project Manager.

Protecting Heritage

Tilbury Douglas aims to minimise impacts on built heritage & archaeology through sensitive construction methods.

We will:

- Identify protected structures such as listed buildings or scheduled ancient monuments.
- Establish the likelihood of encountering archaeological deposits.
- Engage with heritage or archaeological specialists to determine relevant controls.
- Obtain relevant consents where required.
- Tilbury Douglas will inform you of any restriction imposed due to heritage concerns.

We expect you to:

- Incorporate controls and restrictions into your methodology. These might include methods of working, choice of materials, or working under archaeological supervision.
- Adhere to any restrictions imposed.
- Work with care around protected structures and safely store architectural elements which have been temporarily removed.

On-site actions:

- In the event of uncovering unknown items or artefacts (e.g. coins, bones, pottery, brickwork or stonework), ensure that work is stopped in the vicinity of the find and it is reported immediately to the Tilbury Douglas Site Manager.

Environmental Incidents

We will:

- Implement environmental control measures in order to minimise the risk of environmental incidents.
- Prepare an Environmental Incident and Emergency Plan.
- Brief you on emergency response actions and incident reporting requirements.
- Liaise with any regulator investigation following an environmental incident.

We expect you to:

- Respond to all environmental incidents to minimise environmental impact.
- Assist to clean-up environmental incidents and implement remedial measures.
- Assist in any incident investigation.

On-site actions:

- Report all environmental incidents or near misses to the Tilbury Douglas Site Manager as soon as you are aware of it, whether it is as a result of your work or not.