

AQUATIC CONTROL ENGINEERING LTD

Document Title: Sustainability Systems Management Register

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Sustainability Systems Management Register

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Sustainability Policy Statement

Aquatic Control Engineering Ltd (ACE) Design, Supply, Project Manage, Install and Commission Water Level Control Equipment, Fish Migration Solutions and Waterway Maintenance Machinery. We are committed in developing innovative solutions with a strong belief that our products and service can make a major contribution to a more sustainable world. Therefore Aquatic Control Engineering Limited (ACE) is committed to proactive environmental management through its own operations as well as positively influencing key stakeholders, customers and our supply chain with this approach.

Aquatic Control Engineering Limited (ACE) is committed to minimising its impact upon the environment by means of continual innovation and improvement **by involving our staff, subcontractors and suppliers.** ACE will continue to carry out measures to meet, develop and exceed the requirements laid out by law, policy and internal goals to improve its environmental performance year on year.

ACE recognises the importance of environmental protection; it operates responsibly and in compliance with all environmental regulations, legislation and approved codes of practice. It is an objective of ACE to operate with, and to maintain good relations with all regulatory bodies.

Key measures at the core of our current Sustainability Policy include:

1. The regular assessment of the impacts from organisational aspects to the Environment, Economy and Society
2. Minimising the production of waste
3. Minimising energy and water consumption
4. Reduction of greenhouse gas emissions
5. Promoting the use of recyclable and renewable materials
6. Reducing and/or limiting the production of pollutants to water, land and air
7. Controlling noise emissions from operations on and off-site
8. Minimising environmental risks to the general public and employees
9. Minimising risks to ecosystems and supporting biodiversity
- 10. Raising sustainability awareness training of all staff**
- 11. Raising CSR awareness training of all staff**
- 12. Raising awareness of employees on economy, finance and cash flow.**

ACE aims to improve and extend its range of products and services with sustainable considerations; to provide products and services with low environmental impacts and high environmental benefits to our customers where possible.

Reporting on sustainability is filtered through all managerial levels at quarterly management reviews and features strongly in the heart of all our internal and external operations. An annual sustainability plan sets goals and time frames for their achievements which are continually monitored by the Environmental Manager. Adequate financial and physical resources will be allocated to achieve ACE's sustainability goals.

ACE will continue to carry out measures to meet, develop and exceed the requirements laid out by law, policy and internal goals to improve its sustainability performance year on year. This is endorsed by management and policy is formulated by the Environmental Manager. However, it is



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the joint responsibility of the Environmental Manager and all ACE employees to implement as a team.

Date: January 2020

Stephen Randall
Managing Director

| | |
|---------------------------------|----------------------------------|
| Last Review : 20/01/2020 | Next Review: January 2021 |
|---------------------------------|----------------------------------|





Sustainability Responsibilities

MANAGING DIRECTOR

Stephen Randall

The Managing Director is responsible for ensuring effective company policy for HSEQ to all its employees & (sub)contractors and ensuring all are aware of their responsibility. It is also their responsibility to ensure they understand the company's responsibility under the Health and Safety at Work Act 1974 and other relevant legislation for Aquatic Control Engineering's business.

Joint Chairman (HSEQ Lead)

Marjon Van Nieuwenhuyzen Nominated Person responsible for Health and Safety

NEBOSH QUALIFIED

Marjon is responsible for vetting and overseeing all Health and Safety, Quality, Sustainability and Environmental policies, procedures, training, implementation, accident / incident investigation reporting and prevention for Aquatic Control Engineering.

Environmental Manager

Marjon Van Nieuwenhuyzen

Responsible for reviewing and implementing environmental aspects and impacts across the company whilst also ensuring biodiversity and sustainability is maintained. In line with the Environmental Manual ISO 14001, policy, process, training implementation across the company is delivered. Marjon also has a focus on Carbon Management at ACE and ensuring we implement changes on an annual basis.

Further information can be found in our Company Organisational Structure Document

Saved in the Company Documents on our Intranet (Z Drive)

Further information can also be found in the relevant Job Descriptions.

Saved in P:\01 Business Support\07 Organisational Chart CVs and Job Descriptions





Sustainability Management System

Aquatic Control Engineering Limited (ACE) is committed to minimising its impact upon the environment by means of continual innovation and improvement across all the organisations levels. ACE will continue to carry out measures to meet, develop and exceed the requirements laid out by law, policy and internal goals to improve its sustainability performance year on year.

To achieve this, a number of reviews, policies, procedures and plans are in place to monitor and record progress. All of these are summarised in this section to highlight the scope of our Sustainability Management System.

Documentation

Environmental Manual

This living document demonstrates the level of commitment we strive to demonstrate in our Environmental Management Systems. This is used in our internal and external audits for ISO14001:2015 and to continually improve upon our current systems.

Sustainability Management Systems Register

- **Overview and Scope of SMS and documents**
- **Managerial Accountabilities Organogram**
- **Policy**
 - o Policy Statement
 - o General Sustainability Policy Arrangements
 - o Specific Sustainability Procedures and Plans
- **Annual Sustainability Plan and Reports**
 - o Annual Improvement Plan
 - o Report on previous years Sustainability Systems

This document contains comprehensive documentation demonstrating the scope of our Sustainability Management Systems integrated into one document.

Aspects and Impacts Log

- List of aspects and their impacts

The company's generic sustainability aspects and their impacts are identified and listed on a chart which is reviewed and updated on at least an annual basis. Measures to control and influence their impacts are also identified on this chart. Aspects and impacts targeted for specific improvement or monitoring are listed in the company's Sustainability Improvement Plan.



Sustainability Libraries

- Legislation List including website links to the legislation and Guidance, impact to ACE, Controls and Compliance Evaluation Method, and the date of last changes
- Relevant publications
- Sustainability Communications (e.g. newsletters, e-mails sent)

Sustainability Assessments

- A list of current initiatives in place to monitor and record progress of sustainability improvement.
- Updated at least annually pending results from monitoring.
- Quarterly updates of monitoring against these assessments is given in Management review
- Annual reports on the monitoring of these assessments is found in the SMS- Annual Report

Reviews

Sustainability Management Reviews (quarterly)

- Review of Sustainability Aspects and their impacts to management
- Progress update and review of Sustainability Improvement Plan and a quarterly report
- Other important notifications relating to SMS.

Quarterly management reviews provide the platform to report on all sustainability initiatives, updates and progress for consideration amongst management. They also provide an opportunity to filter down relevant communications including training days and new legislation. The minutes of these reviews, therefore, act as a catalogue of our sustainability communications, decisions and improvements.

Sustainability Communications and Training

- E-mails and other communications are ad hoc and regular to promote any sustainability aspect of the environment to staff or to our customers.
- Archive of all help sheets and notices relevant to the training and information of employees.
- Review and evidence of any other Sustainability communication in any other form.
- Evidence and listing of relevant staff training.

Workplace Inspections

- Review of facilities in our office to ensure they meet environmental requirements
- Identification of necessary additional/replacement facilities to improve sustainability goals
- Where necessary, environmental site inspections.
- These are documented in the Management review and in site specific RAMS and folders, past workplace inspection sheets are saved by the Warehouse Operative or Health and Safety Representative.



Sustainability Audits

- Annual Internal audit of compliance to ISO14001 Environmental manual
Annual Internal Audit on CSR and economic impact
- Annual external audit by QMS International to ISO14001:2015

General Sustainability Policy Arrangements

1. It is the responsibility of the Environmental Manager to review, monitor and update and enforce Aquatic Control Engineering's Sustainability Management systems utilising the collaboration of the Managing Director, Technical Director, Quality Manager and Health and Safety Manager. The Environmental Manager is responsible for identifying changes in legislation to adhere to this task.
2. All sustainability information and correspondence will filter through ACE's Environmental Manager.
3. A sustainability review within the management review occurs quarterly and is reported in the minutes of the management review. All other sustainability correspondence to staff will filter down to e-mails and informal internal meetings. Evidence of this is collected in the communications folder and kept up to date.
4. All employees and appointed subcontractors have a duty to report potential hazards that were not accounted for in Risk assessments or methodologies to the Environmental Manager where appropriate.
5. All incidents including accidents, dangerous occurrences or near misses arising out of or in connection with work should be reported to the Health and Safety Manager. All environmental incidents will be recorded and where necessary, investigated by the Environmental Manager. Environmental near misses can be reported on the companies Dare to be Aware cards.
6. Risk assessments and method statements from all the organisations activities will all reflect sustainability impacts and ways in which to reduce risk to the Environment, Economy or Society. This includes the identification of hazardous substances. The magnitude and nature of all impacts are registered in the aspects and impacts log. Updates of this occur with the Environmental Manager, Technical Director, Managing Director, Quality Manager and Health and Safety Manager when necessary.
7. Environmental consents should be obtained, where necessary, in all cases. Reviews of consents will be given to employees by the Environmental manager by any means of communication or review.
8. Aquatic Control Engineering will provide all necessary training to its employees for all their sustainability related aspects of work. This training will be recorded and reviewed. It is the duty of all ACE employees to mention any training needs of themselves or others to the



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Environmental Manager or Managing Director. Personal Development Reviews with employees provide a platform for identifying skills gaps which will be communicated to the Environmental Manager where relevant.

INTERNAL TRAINING:

- Induction training
- Emergency response training
- Informal staff training at Hall Farm
- Toolbox talks on working sites

EXTERNAL TRAINING:

- Where appropriate our staff will attend induction training on working sites
- External training courses for all staff as appropriate

9. Aquatic Control Engineering Ltd is committed to the assessment of all its subcontractors and supply chain for adequate sustainable systems which reflect our own achievements and goals. This assessment is in the form of a PQQ mandatory to all new subcontractors and updated by the Quality Manager. Reviews of the PQQ form are annual and include the Managing Director, Health and Safety Manager, Quality Manager and the Environmental Manager.

10. On-site Sustainability Risks are identified and minimised by:

- Liaison with customers, suppliers, designers, principle designers, principal contractors and other contractors and stakeholders on site
- Consultation of local nature and environmental groups and invasive aquatic specialists where appropriate
- Consulting documents such as environmental / sustainability assessments
- Where appropriate, visiting the site prior to the works commencing
- Preparation of Risk Assessments prior construction / installation projects

11. Standard safe systems of work we use

a. Pollution Prevention

Plan - As part of our overall environmental responsibilities we plan before any of our work starts on site to reduce the risk of pollution incidents. This is documented in our RAMS and Construction Phase Plans. As part of this, we will evaluate how we will manage a pollution incident, if one occurs.

Prepare – We may review the site requirements by way of our **Pollution Prevention Planning Checklist**, recording how we will manage the pollution risks identified. Specific pollution prevention requirements are captured in our Method Statement or Construction Phase Plan for the activity.

Prevent – Having identified the activities, appropriate control measures are put in place. These may include secondary containment, designated areas procedures, screening, drainage separation, silt traps & settlement tanks.





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A designated 'responsible person' will monitor our activities on site and will have sufficient authority, and training to enable them to act to prevent a pollution incident and follow relevant site procedures.

Appropriate spill equipment for the activities will be available and regular site inspections by the 'responsible person' will be carried out. A regular site inspection process will be set up to make sure that as the job progresses the response plan is relevant and each operative is aware of his/ her responsibilities, the risks and actions required.

The above systems of work will be initially conveyed as part of the overall site induction and toolbox talk process.

Further Standard safe systems of work we use:

- b. Reduce Reuse Recycle Think Procedure
 - c. Waste Management Strategy
 - d. Biosecurity - Check Clean Dry Procedures
 - e. Environmental audits, inspections and reviews
 - f. Environmental Consent Checklist
 - g. Pollution Prevention Planning Checklist
 - h. Environmental Incident Emergency Plan
 - i. Reporting, recording and investigation of environmental incidents
 - j. Supplier and (Sub)Contractor selection and monitoring
12. All emergency and evacuation plans will be reviewed annually with the Managing Director, Quality Manager, Health and Safety Manager and the Environmental manager. The plans are the responsibility of the Managing Director and Health and Safety Manager.
13. The Environmental Manager, Health and Safety Manager and Managing Director are to ensure that product information including recycling, COSHH data sheets and other environmental information are on product manuals or otherwise communicated to our customers.
14. The Technical Director is committed to ensuring the reduction of materials and wastage in design and installation. This will be reviewed and reported to the Environmental Manager in Sustainability Reviews.
15. Aquatic Control Engineering will purchase low emission and fuel-efficient fleet vehicles wherever possible. We encourage travel by train and planning of travel to help reduce the environmental impact of our business activities.
16. ACE will maintain their facilities and grounds in a manner that avoids adverse impacts to the environment, economy or society. All employees are given facilities and reminders to reduce-reuse-recycle wherever reasonably possible. The Environmental Manager, Warehouse Operative and Health and Safety Committee member review this when necessary to improve performance.
17. In the unlikely event of ACE having to dispose of:



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- Empty or part empty paint, thinner and other protective coating tins.
- Unused chemicals, chemical containers or sacks containing chemicals.
- Used fluorescent tubes and sodium light bulbs
- Oils and soluble oil cutting fluids
- Substances classed as hazardous
- Other environmentally unfriendly products

The Environmental Manager and/or Health and Safety Manager is responsible for organising safe and thoughtful disposal.

18. It is at the discretion of the Environmental Manager to produce specific policy related documents in conjunction with these statements to better address the key issues and core functions of the current Sustainability Plan. These additional documents will be indexed and updated in the Sustainability Systems Register and integrated into general policy if necessary through a review process.
19. Controlled documents for Sustainability related information will be monitored up dated and held securely for open access by all employees. Other documentation not controlled is filed in a central folder with security to prevent tampering.
20. Aquatic Control Engineering have a focus on Carbon Management. Carbon Management is reviewed at the quarterly Management Reviews. The Carbon Management Report is reviewed and updated on a bi-annual basis. Employees are encouraged to report actions and suggestions which will reduce our CO2 emissions footprint on the Staff Carbon Reduction Log.

*Please see our specific procedures and plans in conjunction with this document.
These are indexed in the Sustainability Systems Register.*



Reduce, Re-use, Recycle, Think Procedure

Aquatic Control Engineering Limited (ACE) is committed to sustainable practice by means of continual innovation and improvement across all the organisations levels.

All ACE employees and guests are responsible for the reduction of energy, waste and the safe recycling of it. You are expected to:

Reduce

- Think about whether you need to print a document and aim to reduce your printing.
- Try to minimise the use of colour when printing.
- Always try to print your documents double sided.
- Use low grade recycled paper for internal documents which have a much lower carbon footprint.
- Try to package products carefully to minimise the use of plastic and cardboard materials.

Re-Use

- Use discarded paper for notes if possible.
- Store all good condition cardboard boxes in the warehouse for re-use in packaging.

Recycle

- Inform the Environmental manager if you do not have the facilities to meet your obligations in this policy or have unsafe disposal areas.
- Return all un-used and old mobile phones and printer cartridges for recycling.
- Recycle paper and cardboard in the bins provided.
- Segregate compost, glass and metal in the bins provided for disposal.

Think

- Switch off lights, heating and your computers when possible.
- Close windows when the heating is on.
- Keep your bins neat, tidy and regularly empty to improve working environment.
- Ensure your guests operate in the same manner as this policy.
- Opt for car share to sites, fit in multiple appointments or take public transport.
- Use the lowest carbon vehicle appropriate for every visit where possible.

Please do not dispose of any chemical materials, construction materials or other materials you are unsure of without seeking the advice of the Environmental Manager.



Bio-Security Plan

1. Introduction

1.1 What is Biosecurity?

Biosecurity means taking action in order to minimise the introduction or spread of invasive non-native species, parasites and diseases.

1.2 Why do we need a plan?

The nature of ACE’s work provides various opportunities for harmful Invasive Non-Native Species (INNS), Parasites and diseases to be transported across land, watercourses and their banks.

The UK and Ireland have various legislative obligations to address and protect from the risk of these, namely The Wildlife and Countryside Act, Water Framework Directive and the Waste Management Licensing Regulations.

In addition to this, ACE’s Environmental Policy highlights our aims to assess our environmental impact and minimise environmental risk.

Furthermore it is the responsibility of each employee of ACE to familiarise themselves with these risks and deal with them responsibly with appropriate control measures in place.

2. What is the risk?

INNS, parasites and diseases can be transferred on our equipment, footwear, clothing and vehicles whilst we carry out our work. They can spread quickly, grow rapidly and take over an area completely. Many countries, authorities and individuals are now facing complex problems associated with these.

The negative effects of these include: economic costs, structural damage, environmental degradation, aesthetic degradation, biodiversity loss, loss of land function, access restrictions and increased risk to our own health and safety and animal welfare.

Some can be poisonous, such as Giant Hogweed, even to the slightest touch. Familiarisation with these and recognising the most common will help in following the correct control measures, whilst caring out our work.

Some of these measures can be simple and inexpensive, however we must be careful, as using the wrong method can make the problem worse and break the law. Our Biodiversity Plan will be based on ACE’s standard systems of work, Plan, Prepare & Prevent.



3. Plan, Prepare & Prevent

3.1 Plan

As part of our overall environmental responsibilities we plan before any of our work starts on site. We capture an initial risk assessment in our **Pollution Prevention Planning Checklist**

Biosecurity should be considered at the earliest stage when planning any field work, from surveying an area through to site removal of our gear. Some biosecurity measures can be as simple and as quick as making sure footwear is clean

Staff to be trained in their awareness and familiarisation of INNS, parasites and diseases, <http://www.nonnativespecies.org/index.cfm?sectionid=47>

It is important to know, with the benefit of pictures in our Field guide, the most common invasive plants. <http://www.nonnativespecies.org/index.cfm?sectionid=47>

This information can be correlated at a planning stage from our initial site survey, customer input and/ or recorded sites. The GB non-native species secretariat provides a variety of information and sources <http://www.nonnativespecies.org/home/index.cfm> . Alternatively speak with ACE Environmental Manager for further guidance.

3.2 Prepare

From this we can then ascertain if we have appropriate control measures in place, as part of the good practice guidance specified within this Freshwater Biodiversity Plan below, or assess if additional measures would be required to reduce the risks further.

Where possible posters and signage should be put in place to make people aware of the risk, and provide advice on how to prevent spread.

A **Pollution Incident Response Plan** provides a contingency plan, to help detect, notify and isolate, whilst carrying out our in-river work/ associated banks and access across agricultural land.

3.3 Prevent

Having identified our activities and the risks posed from INNS, parasites and diseases, appropriate control measures will be put in place. However the following biosecurity measures provide good practice guidance relevant to ACE's generic activities. All ACE staff to be made aware of these via Tool Box talks and staff training. These are to be referred to as our **generic method statement** for reducing the risk of spreading.

General

- Plan visits so that the most risky visit is the last one of the day.
- Arrive at the site with clean footwear and vehicle.
- Ensure footwear is clean (visually from soil and debris) before leaving the site.



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- Ensure vehicle is kept clean - in particular remove any accumulated mud before leaving the site.
- Keep access to a minimum, even when entering a watercourse via its bank. Anything that comes in contact with the water, including boots, could accidentally spread non-native species and should be carefully cleaned.
- If practical, do not take vehicles onto premises, keep to established tracks and park vehicles on hard standing.
- Where possible avoid areas of livestock and areas with known plant disease.

3.3.1 Check

All clothing and equipment should be thoroughly inspected and any visible debris (mud, plant & animal matter) should be removed and left at the water body where it was found.

Particular attention must be paid to the seams and seals of boots and waders. Any pockets of pooled water should be emptied.

3.3.2 Clean

Equipment should be hosed down or pressure-washed on site. If facilities are not available then Virkon Aquatic for anglers, 500g, can be used to disinfect clothing and equipment, or alternatively be carefully contained, e.g. in plastic bags, until appropriate facilities can be found.

Washings should be left at the water body where the equipment was used, or contained and not allowed to enter any other watercourse or drainage system (i.e. do not put them down the drain or sink). Where possible, clean equipment should be dipped in disinfectant solution (e.g. Virkon S) to kill diseases, but note this is unlikely to kill non-native species, hence the practice of using Virkon Aquatic for Anglers instead.

3.3.3 Dry

Thorough drying is the best method for disinfecting clothing and equipment. Boots and nets should be hung-up to dry. Equipment should be thoroughly dry for 48 hours before it is used elsewhere. Some non-native species can survive for as many as 15 days in damp conditions and up to 2 days in dry conditions, so the drying process must be thorough.

4. Report

Everyone can provide useful biological records of non-native species.

Recording forms can be used and sent to Environmental Manager who will report to the relevant organisation if and when appropriate

We also recommend the use of apps for identifying, recording and reporting purposes



Waste Management Strategy

This strategy sets down the framework for all waste management within ACE and due to the diverse nature of activities within the company, a wide variety of wastes are produced and collected, ranging from general wastes, recyclable materials, through to special and hazardous wastes, either at our locations or at our customers sites. The company has a duty to ensure that all of these wastes are disposed of responsibly, using approved, registered waste contractors. ACE is committed to reducing the amount of waste that is produced and goes to landfill.

ACE's approach to waste will adhere by the following waste hierarchy:

Reduce, Reuse, Recycle

Think (alternative solutions such as e.g. energy or water recovery)

Safe Waste Disposal

ACE will adopt the principles of the 'best practicable environmental option' in the delivery of its waste management strategy. ACE will be responsible for selecting and appointing waste collection suppliers to manage the waste the business currently produces, the waste collection suppliers will be responsible for providing management information broken down by European Waste Codes, on a monthly and yearly basis.

Waste KPIs:

ACE aims to reduce its waste for landfill per person employed and its waste for landfill per million turn-over. This is reviewed on an annual basis and reported on in the management review.

Dry Material Recycling (DMR's) bins are used for the disposal of:

- Cardboard
- Paper
- Cans
- Plastic bottles
- Shrink wrap and other clean plastic.

Compost Bins are used for the disposal of:

- Food remains
- Coffee and tea remains

ACE promotes this Waste Management Strategy by:

- Inhouse Training
- Toolbox Talks
- Desktop talks
- Progression towards predetermined targets (KPIs)
- Staff suggestion
- Awards

To comply with the various regulations and the Duty of Care under Environmental Protection legislation, the company recognises the importance of meeting these legal requirements and to



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manage its waste responsibly, to reduce the volume of waste sent to landfill and maximise reuse and recycling where possible. The company requires all staff, contractors and anyone else making use of our premises to comply with this Policy to ensure compliance with all waste legislation.

The company will fulfil the following Policy objectives:

- *To ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for future legislative changes and to mitigate their effects.
- *To minimise waste generation at source and facilitate reduce, reuse, recycle, think and recover over the disposal of wastes, where it is cost effective.
- *To provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management strategy.
- *To promote environmental awareness in order to increase and encourage waste minimisation, reduce, reuse, recycle and recover.
- *To secure where possible revenue for recyclable material
- *To ensure the safe handling and storage of wastes at all operating locations within the business.
- *To provide appropriate training for staff on waste management issues.
- *To promote industry waste management best practice
- *To appoint competent person(s) to provide waste management advice

Hazardous Waste

Where hazardous waste is produced as part of the operational business only approved waste carriers are to be used to dispose of the hazardous waste. Consignment notes must be kept on record for a minimum of 3 years.

Examples of hazardous waste include (this list is not exhaustive):

Aerosols
Fuel and Oil Filters
Waste Paints and Solvents
Spent Gas Monitor Sensors
Waste Oils Lead acid batteries
Oily Rags
Absorbents Alkaline batteries (AAA, AA, A, C & D etc)
Used Test Gas Bottles
Sanitary Waste
Spent Grease Cartridges Ink & Toner Cartridges
Fluorescent light tubes
Waste electrical and electronic equipment

All types of waste are segregated and disposed of by the company and to maintain evidence of the correct methods of disposing of waste using registered carriers. The license of the carrier is checked before the waste is booked for collection.



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Waste oils, oil filters, fuel filters, oily rags, used spill absorbents and used antifreeze are removed from ACE by an approved licensed waste contractor. Such wastes are classed as hazardous / special waste. A consignment note is filled in for each movement of hazardous / special waste and an electronic copy of the consignment note is kept on file.

Waste batteries are stored in the depot in a suitable container to prevent leakage of acid. These are periodically collected when a sufficient quantity has accumulated.

Waste Electrical and Electronic Equipment is segregated and disposed of through the approved licensed waste contractor and documented.

The maintenance contractor who services the vehicles disposes of tyres.

Contractors are to remove their own waste from site.

Spill absorbents are disposed of in a separate container. If absorbents are used at client sites these are brought back to ACE and disposed of in an appropriate container.

Printer and toner cartridges are sent to charities for recycling. Charities are exempt from registration as a waste carrier.

All waste transfer notes and consignment notes must be retained on file at the depot for 3 years (these may be stored electronically).

Emptying Equipment Bunds and Subsequent Disposal

Emptying the bunds is important because, during transportation or lifting operations, whilst manoeuvring the equipment, the contents of the bund can slosh out. This can lead to environmental and health and safety problems, such as slippery surfaces on the load bed of vehicles.

It is therefore important to empty the bund and dispose of the contents in the correct manner:

1. Wash the equipment using as little detergent as possible, these detergents only hold the oils in suspension and make it harder to separate them out during disposal
2. Empty and collect the contents of the bund. Ensure you dispose of contents and rags as hazardous waste after use.
3. If the contents of the bund are primarily oils (diesel, petrol, engine or hydraulic oils and greases) with a small amount of water this should be treated as waste oil and put into a waste oil container.
4. The waste oil is allowed to contain up to 10% water content, so putting a small amount of wash water in the tank is acceptable.

Construction Phase Waste Strategy.

Aquatic Control Engineering Ltd. sets out to achieve a level of waste management and performance that complies with current good practice and legislation. This document sets out generic practical steps and strategies which are adopted on-site to achieve this high standard. Where necessary, additional plans and processes are produced to address the specific nature of each site. These can include:

1. List of waste types, quantities and disposal routes including COSHH



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2. Consultation documents and consents (e.g. IPPC, EPP1)
3. Site specific waste management plans

The main aims of the Construction Phase Waste Management Strategy are to:

- Reduce waste and to ensure that created waste is re-used or disposed in the most sustainable manner.
- Provide measures which ensure tidy sites, free from litter and with accessible facilities for waste disposal to all site employees.
- Ensure that all waste management measures employed during on-site work comply with UK legislation including, Site Waste Management Regulations, the Environmental permitting (England and Wales) Regulations, the Environmental Protection (duty of care) regulations and Hazardous waste regulations
- Protect people and the environment.

Waste is defined as anything that is intended to be discarded and has no specific proposed use at the time of its creation. Where waste is generated, it should be dealt with in a way that follows waste hierarchy and applies Best Available Techniques (BAT). These principles form the core basis of this document.

This construction phase strategy is based on the adequate recognition and assessment of:

1. Scope of works on-site and the proposed timelines
2. Existing waste infrastructure in the surrounding area and its suitability for processing different waste streams
3. Types and quantities of waste which are likely to be generated at each site

The Construction Phase Waste Management Plan, for each project, is structured in the following manner and covers the following headings:

SCOPE

- Timelines and construction objectives
- Site information
- Construction methods and associated assumptions

EXISTING WASTE INFRASTRUCTURE

- Local waste facilities and usefulness

WASTE ANALYSIS

- Types of waste expected
- Volumes of Waste Expected
- Schedule of waste production

SWMP: WASTE PLAN (can include multiple sites under one project)

- Responsibilities on site throughout the construction
- Waste Management Methods
- Materials and logistics required
- Consents and permits required



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SUSTAINABILITY

-Targets and assessment methods

Each Construction Phase Waste Management Plan is made available on-site alongside relevant supporting documents. These include but are not limited to:

- *Sustainability Management Systems Register*
- *COSHH risk assessments and material safety data sheets*
- *Recycling and waste hierarchy site signage*
- *Environmental and waste related risk assessments*

Document Management Procedure

Maintaining up to date and relevant documentation is of key importance and central to the Environmental objectives. Documents are controlled and made available to a number of audiences using the procedure highlighted below. All controlled documents are listed in the controlled document register.

Controlled: Available to the Public

- Public documents are submitted to the Marketing Manager and placed on the website for download in PDF format.
- It is the responsibility of the Environmental Manager to renew the documents.

Controlled: Available to ALL ACE employees

- These are saved in a PDF format in the SHARED Environmental File and/or Intranet
- These will be noted with a footer containing the last date of review and next review date.
- It is the responsibility of the Environmental Manager to renew documents in the SHARED folder and to allow new controlled documents to be submitted for ACE employees on the Intranet.
- Changes, updates and new additions should also be communicated through e-mail to all staff.
- Relevant controlled documents not under the supervision of the Environmental Manager are listed in the Controlled Documents Register also.

Non Controlled: Available to Sustainability Manager

- These documents are saved in an editable format and are kept separately from controlled documents
- It is the responsibility of the Environmental Manager to ensure documents are stored safely and backed up.
- These documents included working formats for the Sustainability systems register, aspects and Impacts Log in excel, Sustainability assessments amongst others.



Sustainability Systems Management Register

OFF-SITE ACCESS

All controlled documents for the public and staff/subcontractors of ACE are available in CD format or on memory stick from the Environmental Manager at any time. It is the responsibility of the Site Manager to ensure these documents are available on site and that subcontractors are appropriately briefed on their content and location.





Sustainability Systems Management Register

Controlled Document Register

P: Computer – Company – Controlled Business Services

| Document/ Folder Name | Summary | Updated |
|--|--|---------------------------------|
| Sustainability Systems Management Register | A register with information on all the sustainability/environmental plans, reviews, policies and procedures relevant to staff and subcontractors of ACE. | At least annually |
| Aspects and Impacts Log | A register of the company's aspects and impacts with information regarding their risk and assessment | At least annually |
| Sustainability Manual | The manual to which our SMS system is designed to address for ISO14001:2015 | At least annually |
| Certifications | ISO 14001 and 9001, OHSAS 18001, Achilles UVDB and Constructionline certificates | When replacements are available |

Other available resources in this folder are:

| Document/Folder Name | Description/Purpose | Updated |
|----------------------|--|--------------------------------|
| Communications | Incoming and outgoing environmental communications are saved in a designated area for review and reference | As new communications are sent |
| On site Resources | Helpful source of legislation/ on site resources | Reviewed annually |
| Training Folder | Contains training records and help sheets, quizzes and materials for keeping employees up to date on Environmental awareness | Reviewed at least annually |

Many Environmentally relevant documents are saved elsewhere as they are primary responsibilities for different departments, but still well worth a look...

| Document/Folder Name | Summary | Updated |
|---|---|-------------------|
| Management Reviews | Quarterly management reviews are performed, agenda and minutes can be found in the designated area of Business Support | Quarterly |
| Sustainability, Health and Safety and Quality Plans and Reports | Health, Safety, Quality and Sustainability are intricately linked; a good overview of those plans and reports is useful. | At least annually |
| Accident and near Miss Reports | These are integrated and include health, safety and sustainability | Continual |
| RAMS Templates | These documents form the basis of our risk assessment methodology statements and detail sustainability considerations on site | When required |



Legislation Review Procedure

ACE recognises the importance of environmental protection; it operates responsibly and in compliance with all environmental regulations, legislation and approved codes of practice. It is an objective of ACE to operate with, and to maintain good relations with all regulatory bodies.

Legislation review can be relatively complex, thus it is important that regular external communications are filtered by the Environmental Manager. Where appropriate external advice from a suitably qualified professional can be sought and additional training identified. This is the responsibility of the Environmental Manager to report to the Managing Director. Reviews of legislation are all reported to the management review.

Annual:

- Relevant training course/Seminar or Workshop addressing new or improved legislation

Quarterly:

- Review of current legislation for updates using external resources list and any other appropriate site.

On-going:

- Receipt of e-mails from registered associations (see external resources list)

Any changes identified in legislation or review are used to update documentation systems and then notified to senior employees at Quarterly Management Review meetings. Following a Management Review a process for informing additional staff is formulated and rolled out. This can include:

- E-mails and updating of controlled documents.
- Staff help sheets and information leaflets and posters provided.
- Training sessions provided.
- External training and/or courses provided.
- Changes in organisation of facilities; office movements, removal or addition of a facility etc.
- Additional meetings and changes in company policy/ job descriptions or similar.
- Additions, removal or updates of the legislation library.



External Resource List

This list is non-exclusive but highlights a number of the regularly used references for updating the legislation, legal requirements and good practice into our Sustainability System.

| Source | Summary |
|------------------------------------|---|
| FSB Financial and Legal Magazine | Magazine for small businesses providing good information on office carbon reduction and energy efficiency as well as ISO14001:2015 best practice, 12 editions per year |
| ADA gazette | New legislations sometimes available regarding our customer systems and agricultural land management, 4 editions per year |
| HSE | E-mails contain information regarding health, safety and the environment specific to on-site |
| Natural England | Great resource for information regarding wildlife country act and considerations and consents for protected sites |
| Environment Agency | Great information of fish passage, good practice for screening at outtake's and in-falls and lots of helpful information on waste hierarchy updates |
| DEFRA | Defra Website provides great advice on a number of issues regarding flood management in local regions and EU water framework Directive |
| Legislation.gov | This website is a working document of everything. It has been particularly integral to the writing of the biosecurity plan. |
| Supplychainschool.co.uk | This site is an online learning forum designed to help the construction sector assess and improve their knowledge of sustainability issues facing our industry. |
| Foundation of Water Research (FWR) | www.fwr.org www.eufwd.com |
| European Water Framework Directive | The EU Water Framework Directive - integrated river basin management for Europe http://ec.europa.eu/environment/water/water-framework/index_en.html |



Annual Sustainability Report 2019

Executive Summary

Our slogan “For Innovation and Sustainability” was again clearly reflected in many ACE activities and projects in 2019 e.g.:

- Ongoing implementation of the Wildlife Landscape Plan on our field
- Kinlochleven project which ensured that the hydro power station can produce even more green CO2 neutral power today than ever before
- Our Generation 8 design eel/elver passes supplied and installed at 3 United Utilities sites
- Attend and present at the Environment Agency Low Carbon Exposition “Achieving our Carbon Ambitions: Solutions for a Climate Emergency” at the Millennium in Birmingham in December

These amongst others demonstrate that in terms of Innovation and Sustainability we have had another successful year.

Sustainability related Training completed in 2019

3rd April 2019

Climate Change and Carbon – Supply Chain Sustainability School
Marjon Van Nieuwenhuyzen

5th April 2019

KIER – Supply Chain Sustainability School
Sustainable Procurement
Dafydd Roberts

29th August 2019

INSPIRES Sustainability Value; Andy Gilfillan Presented Carbon Management
ACE HQ
Andy G, Stephen, Josh, Andy T, Helen, Julie, Graeme, James, Marjon, Jacob, Tom

8,9,10 October 2019

50th annual Conference IFM
Nottingham
Martin van Nieuwenhuyzen, Marcus Widdison

3,4 December 2019

Environment Agency Low Carbon Expo
Achieving our Carbon Ambitions: Solutions for a Climate Emergency
Millennium Point, Birmingham
Bas, Marjon and Martin van Nieuwenhuyzen, Marcus Widdison, Paul Brennan



Sustainability Systems Management Register

Sustainability related external Presentations in 2019

16th May 2019

Water Equipment Show

Flood Defence without compromising Ecology

Presented by Martin Van Nieuwenhuyzen

12th September 2019

Flood Expo

Flood Defence without compromising Ecology

Presented by Martin Van Nieuwenhuyzen

4 December 2019

Environment Agency Low Carbon Expo

Achieving our Carbon Ambitions: Solutions for a Climate Emergency

Millennium Point, Birmingham

Reducing the Environmental Impacts of our Mechanical and Electrical Flood Defences through Ingenious Design

Presented by Martin van Nieuwenhuyzen

Sustainability related internal Presentations in 2019

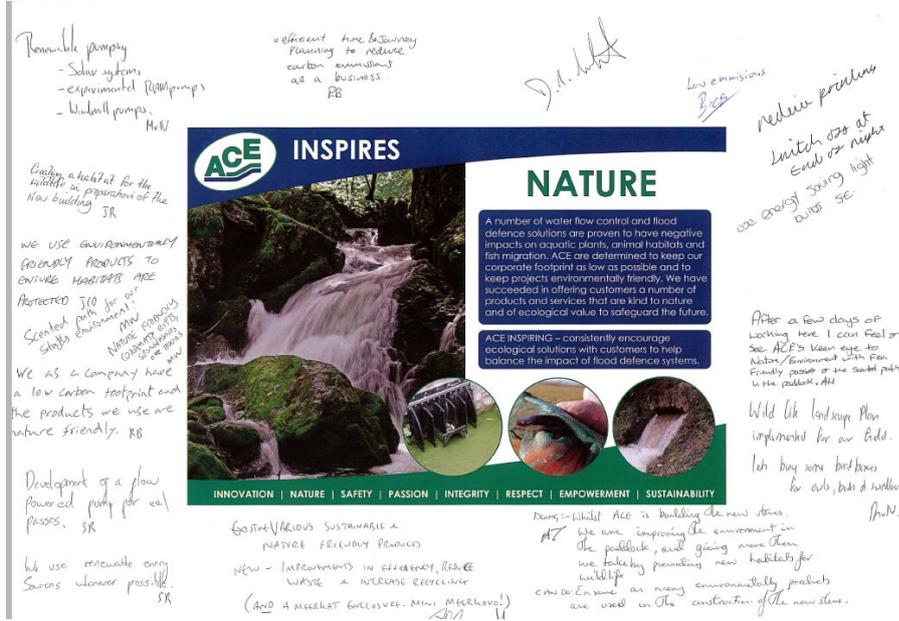
Interactive in- house training covering our core Values INSPIRES were presented throughout 2019 by various ACE staff





Sustainability Systems Management Register

Signed posters have been framed for display in the workplace



Key Successes of 2019:

Fish Pass Innovation and Development is one assessment which is continuing to improve year on year. Following feedback from our customers we have developed Generation 8 Design Elver Pass and since this has been successfully installed at 3 United Utilities sites in the North.





Sustainability Systems Management Register

Fish Friendly Pumps

This year we have commissioned 2 fish friendly axial pumps at Appledore, supplied and installed for the Environment Agency via the main contractor JT Mackley. We hope these will be tested for fish friendliness.

Hull International Fisheries Institute has monitored the effect of the Bells Pumping Station on eels. All tagged eels passed through the Archimedean screw pumps unharmed however only 20% of the eels came through. The conclusion was that many eels may have been deterred by the weed-screen in front. FishFlow Innovations supplied a replacement for part of the screen which now has 212mm gaps between the bars of the replaced screen instead of the original 150 mm. Hull International Fisheries Institute will be carrying out further research to see whether less eels return now there are wider gaps.



In March we completed a site audit for Achilles UVDB Verify at the 2 axial pumps at Laxton (Ouse and Humber IDB) with excellent results.





Sustainability Systems Management Register

We are currently in the Design Phase for 4 archimedean screw pumps for Ovivo for a power station. These are to be used as a fish return system.

The 6 fish friendly axial pumps for Keadby Pumping Station for GTBV for the Environment Agency will be installed in 2020. We expect that on completion of this project these pumps will also be monitored for fish/eel friendliness.

We feel that this year we have again done our slogan proud “ *Flood defence without compromising fish migration – Fish migration without compromising flood defence*” .

Carbon Management

Andy Gilfillan has written a comprehensive Carbon Management Summary Report outlining our vision and efforts to reduce carbon emissions. As our efforts are widespread throughout our company it is good to have a concise overview.



Carbon Management this year has also been looked at in terms of the use of our car and van fleet and modes of travel

In comparison with the previous year:

- Train travel has increased, from approx 1222 miles in 2018 to 2586 miles in 2019
- Average CO2 emissions per vehicle has continued to come down - from 137.9 to 131.1
- Average annual company mileage per employee has increased from 5827 to 5973
- Annual company mileage per million turnover has come down from 30592 to 30531

The increased use of tele conferencing has helped to reduce the company mileage over the past years.

See Table below:





Sustainability Systems Management Register

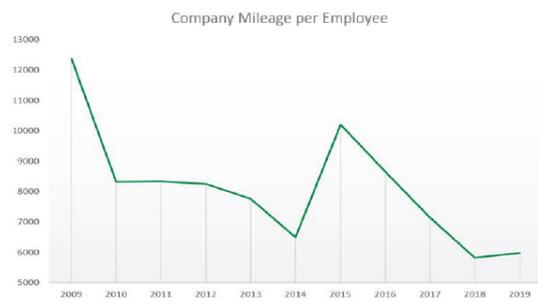
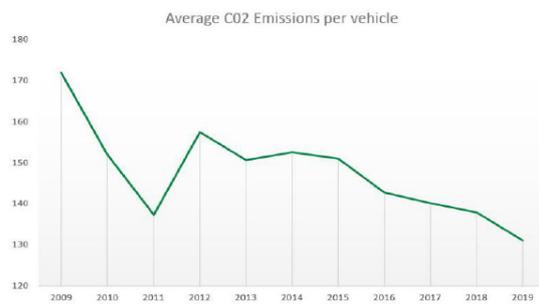
Travel

We are continually aiming to reduce our carbon emissions produced from our vehicle fleet. In 2019-2020 we will be looking to further lower the average emission of our car fleet in combination with increased fuel efficiency. The promising advancements of all-electric/hybrid vehicles will further aid in our efforts to reduce carbon emissions and is definitely something we will consider in the near future.

Moreover, when we need to travel long distances, we encourage travel by train and by bicycle for short distances. All transport within ACE is monitored by our Environmental Manager. Year on year, more and more miles are completed using public transport rather than company vehicles.

In absolute terms, the picture is clear. Worldwide, road users account for about 71% of transport CO2 emissions, with railway companies making up less than 1.8%, next to 12.3% for aviation and 14.3% for shipping, according to the International Energy Agency and International Union of Railways.

We increasingly organise tele-conferences to additionally reduce our vehicle carbon emissions. This can also include training as well as general communications. Tele-conferences are not only environmentally friendly, they are also a more efficient and safe way of working as less time is spent on travel.



Carbon Management Report



Waste

In 2019 we have continued to implement our waste management strategy. In particular we have concentrated on the correct segregation of waste, in particular plastics.

All offices now have compost bins and all compostable material is recycled in our garden and field.



As a result of the implementation of our Waste Management Strategy and our Reduce-Reuse-Recycle-Think efforts both the figures for waste for landfill per person based at Hall Farm and the max litres waste for landfill per million TO have decreased again (see table below)





Sustainability Systems Management Register

| Year End 28 March | Number of FTE staff based at Hall Farm | Turnover M | Max Litres waste for Recycling | Max Litres waste for Recycling per person based at Hall Farm | Max Litres waste for Recycling per million TO | Max Litres waste for Landfill | Max Litres waste for Landfill per person based at Hall Farm | Max Litres waste for Landfill per million TO | Total Waste Litres | Total Waste per person based at Hall Farm | Total Waste per million Turn Over |
|-------------------|--|------------|--------------------------------|--|---|-------------------------------|---|--|--------------------|---|-----------------------------------|
| 2006-2007 | 6 | 1.2 | 6240 | 1040 | 5200 | 6240 | 1040 | 5200 | 12480 | 2080 | 10400 |
| 2007-2008 | 6 | 1.3 | 6240 | 1040 | 4800 | 6240 | 1040 | 4800 | 12480 | 2080 | 9600 |
| 2008-2009 | 7 | 2.3 | 6240 | 891 | 2713 | 6240 | 891 | 2713 | 12480 | 1783 | 5426 |
| 2009-2010 | 9 | 1.5 | 12480 | 1387 | 8320 | 6240 | 693 | 4160 | 18720 | 2080 | 12480 |
| 2010-2011 | 10 | 2 | 34840 | 3484 | 17420 | 6240 | 624 | 3120 | 41080 | 4108 | 20540 |
| 2011-2012 | 11 | 2.6 | 34840 | 3167 | 13400 | 6240 | 567 | 2400 | 41080 | 3735 | 15800 |
| 2012-2013 | 12 | 2.5 | 34840 | 2903 | 13936 | 6240 | 520 | 2496 | 41080 | 3423 | 16432 |
| 2013-2014 | 12 | 2.4 | 34840 | 2903 | 14517 | 6240 | 520 | 2600 | 41080 | 3423 | 17117 |
| 2014-2015 | 14 | 3.0 | 34840 | 2489 | 11613 | 6240 | 446 | 2080 | 41080 | 2934 | 13693 |
| 2015-2016 | 16 | 3.7 | 34840 | 2178 | 9416 | 6240 | 390 | 1686 | 41080 | 2568 | 11103 |
| 2016-2017 | 18 | 3.5 | 34840 | 1936 | 9954 | 9360 | 520 | 2674 | 44200 | 2456 | 12629 |
| 2017-2018 | 19 | 4.0 | 34840 | 1834 | 8710 | 9360 | 493 | 2340 | 44200 | 2326 | 11050 |
| 2018-2019 | 21 | 4.5 | 34840 | 1659 | 7742 | 9360 | 446 | 2080 | 44200 | 2105 | 9822 |

Water

Water minimisation efforts continued in 2019. However water butts have not been installed at the new stores as yet as currently all the surface drainage water is directed to our wildlife ponds, the water level of these have dramatically lowered since the drought period in the summer.

See table below

| Water Invoices | | | | | | | Volume used in cubic meters per staff based at Hall Farm per half year | Volume used in cubic meters per M Turnover per half year |
|----------------|--------|-----------------------------|---------------|--------------|------------------------------|-------------|--|--|
| From | To | Volume used in cubic metres | volume Charge | no FTE staff | FTE staff based at Hall Farm | TO year end | | |
| Aug-09 | Feb-10 | 94 | 120.92 | 9 | 9 | 1.5M | 10.4 | 62.67 |
| Feb-10 | Aug-10 | 173 | 219.67 | 10 | 10 | 2.0M | 17.3 | 86.50 |
| Aug-10 | Feb-11 | 130 | 164.32 | 10 | 10 | 2.0M | 13.0 | 65.00 |
| Feb-11 | Aug-11 | 147 | 197.07 | 11 | 11 | 2.6M | 13.4 | 56.54 |
| Aug-11 | Jan-12 | 137 | 187.59 | 11 | 11 | 2.6M | 12.5 | 52.69 |
| Feb-12 | Aug-12 | 109 | 155.06 | 12 | 12 | 2.5M | 9.1 | 43.60 |
| Aug-12 | Aug-13 | 241 | 354.63 | 12 | 12 | 2.5M | 11.0 | 48.20 |
| Aug-13 | Aug-14 | 247 | 408.43 | 15 | 15 | 2.0M | 9.5 | 61.75 |
| Aug-14 | Aug-15 | 247 | 408.91 | 16 | 16 | 3.0M | 8.8 | 41.17 |
| Aug-15 | Aug-16 | 189 | 279.68 | 18 | 18 | 3.7M | 5.9 | 25.54 |
| Aug-16 | Aug-17 | 207 | xxx.xx | 20 | 20 | 3.5M | 5.8 | 29.57 |
| Aug-17 | Aug-18 | 220 | 296.95 | 21 | 21 | 4.0M | 5.8 | 27.50 |
| Aug-18 | Aug-19 | 212 | 291.5 | 22 | 22 | 4.5M | 4.8 | 23.60 |

Paper use

Website developments have enabled us to promote our environmental systems to the greater public and have greatly reduced our need for leaflets in house. As a result paper used for marketing has reduced. Promotion of our sales literature online (over 90%) which is downloadable from our website has further reduced the need for printing. As a result paper use over the past year has reduced significantly (see table below).





Sustainability Systems Management Register



PAPER USE AT HALL FARM

| 1 Sept/ 31 August | Number of FTE staff based at Hall Farm | Total Paper Use In reams | Average reams of paper per person per month | |
|-------------------|--|--------------------------|---|-------------------------------------|
| 07/08 | 6 | 41 | 0.57 | |
| 08/09 | 6 | 30 | 0.42 | |
| 09/10 | 7 | 54 | 0.64 | |
| 10/11 | 10 | 71 | 0.59 | |
| 11/12 | 11 | 72 | 0.55 | |
| 12/13 | 12 | 70 | 0.49 | |
| 13/14 | 13 | 48 | 0.31 | |
| 14/15 | 14 | 122 | 0.73 | New KWT catalogues printed in-house |
| 15/16 | 16 | 70 | 0.36 | |
| 16/17 | 18 | 52 | 0.24 | |
| 17/18 | 19 | 67 | 0.29 | |
| 18/19 | 20 | 41 | 0.17 | |

August 2019

Memberships

In 2019 ACE continued the sponsorship to support the RSPB and the corporate affiliate plus membership with Nottinghamshire Wildlife Trust amongst others.

ACE also continued the professional memberships to the Association of Drainage Authorities, the Institute of Fisheries Management and the Pump Centre.

The Directors are members of the National Trust and the World Wide Fund for Nature.

CSR

From December 2018 – July 2019 we took part in the Bessacarr Recycling Initiative, which recycled waste which normally goes to landfill.

AIR AND CLEANING PRODUCTS



BISCUITS AND CAKE BAR WRAPPERS



WRITING INSTRUMENTS



BEAUTY PACKAGING



ORAL CARE



CRISP PACKETS



This had the dual purpose of raising funds for the school, as well as helping the children to understand how they can help the environment.



Sustainability Systems Management Register

We continued to recycle bottle tops separately after this project. Some of the bottle tops were made into a wreath by Scawby Academy and displayed in a church in Scawby over Christmas. The school intends to do a bigger art project in the near future. We plan to continue to collect bottle tops for schools or for separate recycling.



Our Technical Director James has attended Ranskill Primary School in order to discuss eels and elverpasses and other ACE topics in March and reported the children were very interested.

Environmental Manager Marjon has contributed to the community litter picking in 2019, covering several of the public footpaths around Rampton.

ACE, represented by Marjon, is part of the Initial Response Team to implement where and when required the Rampton & Woodbeck Parish Council Emergency Plan.

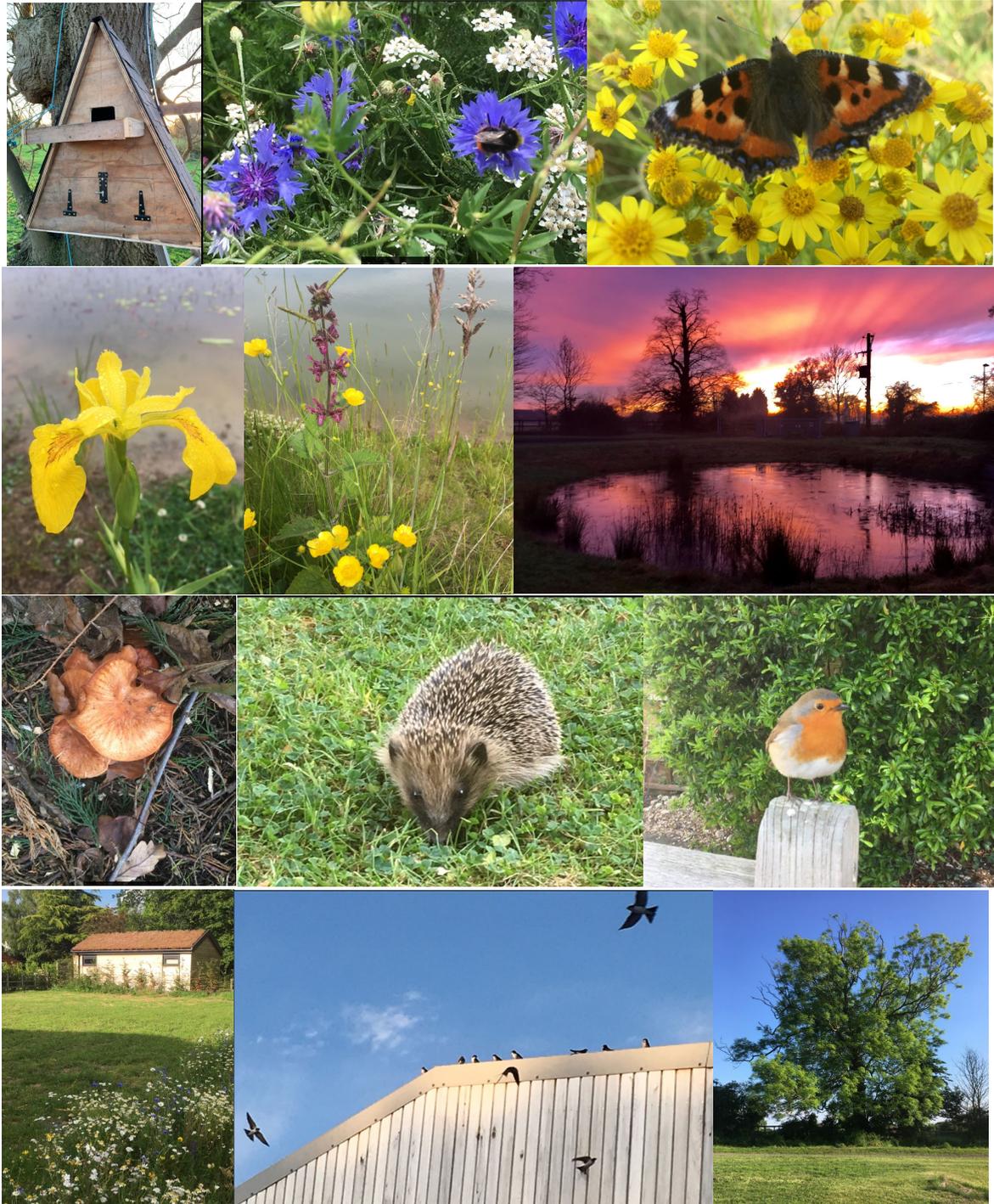
ACE donated £100- to Rampton and Woodbeck Parish Council to sponsor a flower planter.

Apart from contributing through memberships and activities as above ACE has made donations to the following charities:

- ❖ MacMillan Cancer Support
- ❖ Cancer Research UK
- ❖ Rivers Trust
- ❖ Denaby United FC
- ❖ Ella's Nest swing Rosette (Disability Swing)

Development of a Wildlife Landscape Plan on the field around our new stores and carpark

This development includes a wildlife landscape plan whereby ACE aim to maximise the aesthetic and ecological value, as well as the practical value, of this development, and in doing so to minimise any negative environmental impact. The creation of a varied landscape incorporating water, wild flowers and a wide variety of native plant species will provide both habitat for wildlife and amenity for employees and neighbours, as well as chime with the ethos of our customers.



Green Spaces

Green spaces are becoming even more important in modern day society. The benefits stretch far further than just an environment for our wildlife to thrive. Green spaces absorb carbon and in turn generate oxygen and are extremely beneficial to our mental health.

At ACE we have implemented our wildlife landscape plan to further reduce our carbon footprint. Included in our plan is the planting of new trees and bushes around our site. A



Sustainability Systems Management Register

sedum roofed garden office was built in the previous year, two wildlife ponds have been created with life now starting to thrive. Wildflower borders have been planted at the edge of our walkways.

Raising awareness of employees on economy, finance and cash flow.

The directors have involved the management team and senior staff in finance and cash flow. Regular reports are sent to all staff in relation to our progress with order intake and turnover targets.

For almost every project the gross margin is calculated.

ACE has made the project managers responsible for the project finance.

Standards, Audits and Benchmarking

In March ACE was audited by Achilles Information Ltd and we achieved very good benchmarking scores for our management system evaluation and excellent scores for our onsite assessment.



ACE was externally audited by QMS International for ISO 9001:2015 and ISO 14001:2015 in December and passed with good results.

Environmental Award





Sustainability Systems Management Register

Tom Urwin was awarded this year’s environmental award on the basis of his achievements as recorded on the staff CO2 reduction log and also as a recognition of his proactive approach, for example initiating communications with one of our main suppliers in order to reduce packaging.



Annual Sustainability Plan 2020

Executive Summary

Sustainable performance is at the core of Aquatic Control Engineering and this plan is set to focus on maintaining high standards already achieved.

Core overarching objectives for Sustainability Management and Improvement in 2020 are:

1. Increase internal and external communications on sustainability related work within ACE.
2. Maintain good environmental indices including no. incidents and accidents recorded.
3. Include installations teams, project and sales managers in the evolution of Good Sustainable practice at ACE
4. Improve upon our network for legislation and consent changes
5. Carbon reduction efforts to be continual and spanning the entire range of ACE activities and assets
6. Ongoing Training to support our sustainability efforts.

The emphasis in 2020 will be on the standard safe systems of work we use:

- a. Pollution Prevention
- b. Waste Management Strategy
- c. Biosecurity Check Clean Dry Procedures

Specifically, the following initiatives are at the core focus of Sustainability Management and Improvement for 2020:

Company Values

All staff will be asked the sign the posters relating to the topics of the inhouse training sessions to demonstrate their commitment to the Companies Values.





Waste

In 2020 we are aiming to further improve our waste segregation, this now includes segregation of waste for compost. Compost bins are located in the offices. These are to be emptied at least weekly. Two brown containers are located on the yard for garden waste for composting.

Pollution Prevention

We are planning further sessions on pollution prevention. In particular practical incident response training and dewatering training.

Freshwater Biosecurity Plan

Further in-house training in the form of a quiz is planned for 2020

Website and PR Utilisation

Our sustainability systems win ACE orders and framework contracts and promotion of our successes is important. The Environmental Manager will be working with Marketing to produce tweets, press releases and other items of this nature.

Sustainability Case Studies

Our Carbon Management Report is to be updated by December 2021. A sustainability case study on the Bretton water siphon can be added and any other sustainability case studies reflecting the 2020-2021 period.

Carbon Management

We are planning to update the current Carbon Management Report in or before December 2021. As part of our Environmentally Conscious Procurement Environmental Assessment Marjon has assessed the locality of our approved suppliers. This has been added to our environmental assessments in 2020 for ongoing monitoring and review. We plan to continue to work with Bert Dros (based in the Netherlands) for guidance and quality control for our Dutch suppliers so that time, cost and the carbon footprint related with flights are reduced.



Sustainability Systems Management Register

All ACE employees are encouraged to suggest carbon reduction ideas or achievements and record these in our staff CO2 reduction log which is reviewed quarterly.

Tele Conferencing

We regularly organise tele-conferences (with or without video link) to effectively reduce travel. Tele conferences are not only environment friendly, they are also a more efficient and safe way of working as less time is spend on travel.

As part of the refurbishment of the current offices we are planning to buy more advanced video conferencing equipment.

Integrated Working

Increased focus in 2020 is to be paid on how best to work together with all staff to efficiently review all areas of quality, health and safety, environment, economy and society.

We are aiming to have more shorter meetings to improve efficient two- way communication within our team. Where relevant subcontractors will also be invited.

We will be promoting increased use of our HSEQ checklists to ensure that nothing is overseen and we are planning increased check and control procedures for our installation projects. Checks on Bills of materials and Quality inspections of incoming goods may help to prevent unnecessary travel and transport and may prevent material and energy waste.

Site inspections and photo reporting of the installation projects to the relevant project manager or director may help to ensure or improve environmental management on site.

We have a WhatsApp Group for the entire ACE Team so all can be kept up to date with in particular photo's from site.

Water

Water minimisation and water use measurement to continue in 2020.

Development of a Wildlife Landscape Plan on the field around our new stores and carpark

This development includes a landscape plan whereby ACE aim to maximise the aesthetic and ecological value, as well as the practical value, of this development, and in doing so to minimise any negative environmental impact. The creation of a varied landscape incorporating water, wild flower meadow and a wide variety of native plant species will provide both habitat for wildlife and amenity for employees and neighbours, as well as chime with the ethos of our customers.

In 2020 we will continue the environmental assessment on the Biodiversity of our field and garden.

Green Spaces = Happy Places

With our efforts to further improve our field and garden we hope to improve the quality of working life for our team as we believe that green spaces are happy spaces. Green spaces can be extremely beneficial to our mental health and we welcome employees having meetings or taking breaks in our field or garden.

CSR

If and when required ACE will assist with the Rampton & Woodbeck Parish Council Emergency Plan.





Sustainability Systems Management Register

Marjon van Nieuwenhuyzen is a member of the initial response team and trusts she will be supported in this role by the team.

ACE will continue to support charities such as the RSPB and the Nottinghamshire Wildlife Trust and sponsor a variety of charity fund raising events.

The Directors of ACE continue to support the National Trust, World Wide Fund for Nature and Unicef.

Marjon plans to complete some community litter picking on the public footpaths around Rampton again in the Spring and Summer of 2020.

Marjon will look into joining the Retford Plastic Free Group.

Car Fleet /Travel

In 2020 we will be looking into further lowering the average Emissions of our car fleet in combination with increased fuel efficiency.

We encourage travel by train and bicycle wherever practical. As from 2016 we keep data on our train travel.

We plan to obtain one or two EV Charging points in our car park in 2020, a grant towards this may be available

Checklists

In 2020 we will continue to promote use of the Pollution Prevention Planning Checklist to ensure good environmental practise.

Targets

Each year a number of on-going assessments are target focused and monitored throughout the year.

By the end of 2020 we would like to have achieved:

1. 3% reduction in water use per FTE ACE staff
2. 3% reduction in the use of paper per FTE ACE staff
3. Increased awareness of sustainability, in particular our safe systems of work:
Pollution Prevention, including prevention of microplastic pollution
Waste Management Strategy
Biosecurity Check Clean Dry Procedures
4. Increased awareness of economy, finance and cash flow under our staff
5. Increased awareness of the targets as stated in our Environmental Initiative Summary

The quarterly management reviews to review and report on our sustainability/environmental initiatives and targets.

Internal environmental assessments as per schedule stated on the Environmental Initiative Summary. Internal audits where possible as per *2020 Internal Environmental Audit Matrix ISO 14001*



Sustainability Systems Management Register

2015. Vetting of the internal audits by a member of the management team. Findings and recommendations to be passed on to the quarterly management reviews

Environmental Calendar 2020 below

| Environmental Calendar 2020 | | | | | |
|--|---|--|--|---|---|
| Jan | Feb | March | April | May | June |
| Circulate and communicate Annual Sustainability Report and Plan Planting of 16 native Hornbeam trees in our field. Communication Tips for living with less plastic | Workplace inspection Circulate and communicate updated Environmental Aspects and Impacts | Community Litter Picking start Review Staff CO2 Reduction Log | Project spot-check Cowslip plugs to be planted in the field | COSHH inspection Microplastics Communications Update | Practical Pollution Prevention Training Review Staff CO2 Reduction Log |
| July | Aug | Sept | Oct | Nov | Dec |
| Biosecurity Training and/or Quiz | Workplace inspection | Project spot-check Review Staff CO2 Reduction Log | COSHH inspection In house training on PPGs | Project Spot-check | Plan for 2020 Environmental Award |

This plan is subject to constant review and additional objectives and plans are encouraged throughout the year. These changes are discussed in the management review and described in the minutes of the review.

| | |
|---------------------------------|----------------------------------|
| Last Review : 20/01/2020 | Next Review: January 2021 |
|---------------------------------|----------------------------------|

