



# South London Waste Partnership

## Lot 1 Services

*Preferred Bidder - January 2017*

## Technical Response

### Service Delivery Plan 10 – Management Systems

## Contents

|           |   |          |
|-----------|---|----------|
| <b>10</b> | <b>Regulatory Compliance</b>  | <b>3</b> |
| 1.        | Introduction  | 3        |
| 2.        | Quality, Environment and Health and Safety (QEHS) Management System | 4        |
| 3.        | Carbon Management   | 5        |
| 3.1       | Carbon Strategy Planning  | 5        |
| 3.2       | Transport Carbon Reduction  | 6        |
| 3.3       | Green ICT   | 7        |
| 3.4       | Carbon Impact Reporting   | 8        |
| 3.5       | Energy Reporting Assessment   | 10       |
| 3.6       | Assets and operations carbon reduction                              | 10       |
| 4.        | QEHS Management System Implementation                               | 14       |
| 5.        | Monitoring and Auditing   | 17       |
| 5.1       | Auditing  | 17       |
| 5.2       | Monitoring  | 18       |
| 6.        | QEHS Roles and Responsibilities                                     | 19       |
| 6.1       | Contract Staff Members  | 19       |
| 6.2       | Contract Responsibilities:  | 20       |
| 6.3       | Corporate Responsibilities  | 21       |
| 7.        | Enforcement   | 22       |
| 8.        | Added Value   | 23       |

## Lot 1: Technical Response

### 10 Regulatory Compliance

#### 1. Introduction

A crucial component of delivering Services will be to ensure compliance with ever evolving legislative requirements. Working within the framework of an integrated Business Management System (BMS), Veolia will ensure the Services undertaken on behalf of the Partnership are delivered safely, in a controlled and legal manner, and with minimal impact to the environment.

The BMS has been designed in support of our corporate strategy that recognises a culture continuous improvement as key to the consistent delivery of excellence to customers, compliance with regulatory requirements, identification and control of impacts on the environment and maintenance of a safe and healthy workplace for employees.

The health, safety and wellbeing of staff and members of the public are underpinned by the operational working methods implemented across all of Veolia's Contracts. In 2014, we achieved a Gold Award at Royal Society for the Prevention of Accidents (RoSPA) Occupational Health and Safety Awards. Safety of our staff and customers is key to everything we do within our business.



Veolia utilises a system called CEDREC to keep up to date with changes to health, safety and environmental legislation which affects Veolia's corporate policies and procedures. Veolia's dedicated and specialist QHSE teams have ownership of and maintain policies and procedures to ensure they remain up to date with the changes in legislation, technologies, best practice and best available techniques.

#### Veolia Operational Commitments

- *We will utilise our experience and expertise to comply with all Health & Safety regulatory requirements from day one of operations.*
- *We will transfer business systems within one year of operation start and achieve certification to ISO9000, ISO14001 and OSHAS18001.*
- *We will measure, benchmark and monitor our carbon footprint using a bespoke Greenhouse Gas Tracker tool to reduce emissions year-on-year of the contract.*
- *We will fully induct all employees into the safe working operations at the sites and continue to invest in Health and Safety training.*
- *We will conduct risk assessments for all activities prior to and during operations and implement corrective action when necessary.*

## 2. Quality, Environment and Health and Safety (QEHS) Management System

**Confirmation of type of Quality, Environment and Health and Safety (QEHS) management system to be implemented, and timings for implementation in accordance with the Specification.**

To ensure that any Health and Safety and environmental legislation applicable to the Contract are identified, Veolia will utilise its Business Management System (BMS). The BMS complies with the requirements of ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007 and is applicable to all areas of the business. Our corporate compliance is verified and certified by external assessors, and forms a vital part of our accreditation with UKAS certified LRQA (Lloyds Register Quality Assurance).

| ISO 9001: 2008 (Quality Certification) |                                   |
|--|-----------------------------------|
| Certificate Number:                    | LRQ 4005031/A1                    |
| Accreditation Body:                    | Lloyds Register Quality Assurance |
| Initial Certification Date:            | 11 May 1993                       |
| Expiry Date:                           | 31 March 2018                     |

| ISO 14001: 2004 (Environmental Certification) |                                   |
|---|-----------------------------------|
| Certificate Number:                           | LRQ 4005031/B1                    |
| Accreditation Body:                           | Lloyds Register Quality Assurance |
| Initial Certification Date:                   | 11 May 1993                       |
| Expiry Date:                                  | 31 March 2018                     |

| OHSAS 18001: 2007 (Health and Safety Certification) |                                   |
|---|-----------------------------------|
| Certificate Number:                                 | LRQ 4005031/C1                    |
| Accreditation Body:                                 | Lloyds Register Quality Assurance |
| Initial Certification Date:                         | 23 May 2008                       |
| Expiry Date:  | 31 March 2018                     |

At the Services Commencement Date, Veolia will manage the transition to Veolia's QEHS Management System within twelve months. In order to deliver certification within the required time frame, Veolia will implement the plan identified in the table below.

### Certification Plan Timing

| Time Period                    | Actions   |
|--------------------------------|---|
| Prior to Services commencement | <ul style="list-style-type: none"> <li>Implement access to Business Management System on site</li> <li>Train Managers, Staff and sub-contractors on procedures</li> <li>Identify key objectives/ targets for the project</li> </ul>   |
| Month 1-4                      | <ul style="list-style-type: none"> <li>HS Manager, Environment Manager and Quality Manager to assess and confirm BMS procedures are in place and understood by all personnel and continue training</li> <li>Daily, weekly and monthly site checks programme published and implemented</li> <li>Complete internal audit</li> </ul> |

|             |   |
|-------------|---|
|             | <ul style="list-style-type: none"> <li>Monthly updates of new and changed procedures established</li> <li>Agree certification audit programme with LRQA</li> </ul>  |
| Month 5     | <ul style="list-style-type: none"> <li>Management Review of progress</li> <li>Assess effectiveness of training</li> </ul>   |
| Month 6     | <ul style="list-style-type: none"> <li>Management Review of progress</li> <li>Conduct internal audit</li> </ul>   |
| Month 7-9   | <ul style="list-style-type: none"> <li>Management Review of progress</li> <li>Complete actions from initial internal audit</li> </ul>   |
| Month 10    | <ul style="list-style-type: none"> <li>Management Review of progress</li> <li>Stage 1 assessment by LRQA</li> </ul>   |
| Month 11-12 | <ul style="list-style-type: none"> <li>Management Review of progress</li> <li>Complete any actions from LRQA Assessment</li> <li>LRQA conduct certification audit</li> <li>Obtain certification to ISO9001, ISO14001 and OHSAS 18001 standards</li> </ul> |

### 3. Carbon Management

*Approach to Carbon management in the service, including reducing carbon impacts from transport, assets and recycle offtake in the design and operation of the service.*

#### 3.1 Carbon Strategy Planning

Veolia will adopt a proactive approach based on the following four elements which will together meet the Partnerships overall requirements for carbon management and reporting, and enable emissions reductions to be achieved during the Contract term:

1. **Focused Strategy:** Development of a forward-looking and structured strategy which will address and remain ahead of the developing policy framework related to climate change and waste management throughout the Partnership Period. Veolia has closely consulted on European, national and local policies in relation to climate change and carbon management. The strategy will set specific reduction targets for the Partnership and demonstrate how they link to and will contribute to the Partnerships own performance. The Strategy will be agreed at the first annual review meeting for implementation from Year 2 of the Contract.
2. **Active Engagement:** Internal engagement and capacity building to ensure that the scope and requirements of carbon management are understood and that there is broad ownership for delivering actions and achieving improvements across our operations. Also delivering external communications regarding sustainability issues. In particular the Veolia's Annual Review report will inform all stakeholders of progress and achievements in our sustainability performance.
3. **Targets and Action Plans:** Determining the operational carbon footprint for the Partnership and identifying specific opportunities to reduce this impact; contributing to the development and implementation of focused action plans incorporating SMART carbon reduction targets. All plans will be reviewed at least annually through the annual review process.



- 4. Measuring and Reporting:** Veolia will collate data for calculation of the carbon footprint on a monthly basis. Veolia will calculate the baseline performance of the service for all Boroughs in order to gauge improvement in future services through the GHG carbon tracker tool discussed below. This will enable performance to be tracked and addressed in a responsive and proactive way. The information collated will enable annual reporting to the Partnership, in respect of the carbon performance and target reductions.

Veolia's carbon emissions are reported in its Annual Sustainability Report, and we are committed to helping to reduce the UK's reliance on fossil fuels, as illustrated by our campaign for a low-carbon economy at the COP21 summit in Paris in December 2015. Veolia has made a global commitment to avoid 50 million tonnes of emissions by 2020.

Demonstrating the positive impact of its operations, Veolia's reporting also includes the emissions avoided from recovering materials for recycling and recovering energy from waste in the form of electricity and heat.

Veolia qualifies for the Carbon Reduction Commitment (CRC) and in the first phase of reporting (April 2010 - March 2013) achieved zero emissions each year due to achieving Electricity Generating Credits (EGCs) for the energy generated at its six Energy Recovery Facilities. The EGCs offset our carbon emissions from consuming energy. In 2014 our reported carbon emissions were as follows:

|                              | GHG emissions<br>(tonnes CO2 eq) |
|------------------------------|----------------------------------|
| Direct emissions (scope 1)   | 1,644,478                        |
| Indirect emissions (scope 2) | 87,051                           |

### 3.2 Transport Carbon Reduction

Veolia will reduce transport carbon emissions by proposing:

- The use of Euro 6 Dennis Eagle EEV (Enhanced Environmental) Vehicle which will achieve lower emissions of NOx, hydrocarbon (HC) and particulate matter (PMs) when combusting fuel. Veolia plans to retrofit existing vehicles with the Dennis "eco fuel saver pack".
- The use of Ultra Low Sulphur Diesel as the primary fuel for all vehicles on the Partnership with diesel power units. This conforms to EN590 standard which contains a minimum 5% bio-diesel element. Veolia is currently in the development process of sourcing a sustainable bio-fuel made from reclaimed bio-diesel oils (Fatty Acid Methyl Ester) to enhance the use of Bio-diesel within the whole of Veolia.
- To monitor and analyse data on fuel consumption in vehicles via the DES (Driving Efficiently and Safely) tracking and monitoring system. DES monitors speeding, over revving and idling, with the objective to reduce accidents, fuel consumption, costs, and carbon footprint. The latest trial of DES demonstrates fuel and carbon savings of up to 5%.

- The use of the “ChemEcol” fuel additive where bulk tanks exist at depots, which reduces fuel consumption and carbon emissions by up to 3%.
- The monitoring of rounds and route optimisation to improve the service to customers, as well as reducing fuel consumption and carbon footprint. Optimised vehicle routing considers depot locations, vehicle capacities, collection days, property density, and local traffic conditions, to reduce mileage where possible.

### Driving Efficiently and Safely Programme

*Veolia has launched a nationwide initiative to improve all drivers behaviour, save fuel and limit the environmental impacts. Driving Efficiently and Safely’ (DES) Programme. All vehicles are fitted with GPS tracking systems. This equipment allows us to remotely monitor driver behaviour including acceleration and harsh braking, over-revving and excessive idling; some of the main causes of vehicle damage and premature wear as well as excess fuel consumption. This information is then collated into an individual driver scorecard and used to assess performance. It is also presented in a league table format to promote a sense of friendly competition between drivers. The DES scheme offers both practical and theoretical driver training to all frontline drivers. This training is supplemented by the production of daily, weekly and monthly reports designed to highlight improvements, measure success and identify areas to be worked on.*

### 3.3 Green ICT

Sustainable practices are embedded across Veolia’s organisation and we strive to reduce emissions and energy consumption wherever possible, including across our ICT network.

As part of the technical assessment for any new hardware, the energy efficiency and power consumption are compared across different suppliers, which then forms part of the decision making process. Veolia adopts a life-cycle approach to procuring computer products; each model must meet environmental and socially responsible criteria in the manufacturing, use and end of life phases. Product compliance is verified by an independent third party.

Product selection also includes meeting EPEAT (Electronic Product Environmental Assessment Tool) Gold, which rates greener electronic products, we well as ENERGY STAR, the trusted, government-backed symbol for energy efficiency. This was established to reduce greenhouse gas emissions and other pollutants caused by the inefficient use of energy.



Veolia’s primary data centre is where all live systems related to the Contract will be hosted. Monthly reporting on power consumption is received from Veolia’s datacentre partner (SunGard Availability Services) and there has been a year-on-year reduction on overall power consumption, including a reduction of nearly 50% between January 2015 and January 2016.

Finally, to remind Veolia's office-based workforce to save energy, all computer screens have 'Switch Off' stickers adhered to the top of the screen and this will be enforced at the Contract depots.

These initiatives will help Veolia to deliver the Partnership's core objective of offering improved environmental and carbon outcomes through its back office systems, as well as the front-line services.

### 3.4 Carbon Impact Reporting

Veolia is committed to monitoring and exploring new ways to reduce the carbon impact of the services we provide. We would like to support each of the Boroughs in the delivery of their Air Quality Action Plans and Croydon, Merton and Sutton with their Love Clean Air South London initiative.



We will also ensure we maintain complete and accurate vehicle fuel and mileage records at all times and make these available to the Authorised Officer upon request.

#### Carbon Emission Target

Veolia will monitor the Carbon Performance Ratio (CPR) of the Contract which is calculated as per the formula below:

$$\text{CPR} = \text{Avoided emissions} / (\text{Direct emissions} + \text{Indirect emissions})$$

Where:

- **Direct emissions** – are those associated with fuel consumption and positive emissions of carbon e.g. from vehicles and operation of a materials recovery facility, and methane emissions from landfill.
- **Indirect emissions** – are those associated with electricity consumption.
- **Avoided emissions** – are those associated with the recovery of materials and energy.

Veolia will set an annual target for the Contract to achieve a CPR score greater than >1 to ensure that the avoided emissions offset most or all of the carbon emitted. This target will be reviewed annually and we will look to increase it over the life of the Contract.

This is in line with our Corporate commitment to reduce the carbon emissions associated with all our operations by maintaining a Carbon Performance Ratio of >1. This also forms part of Veolia's Corporate Social Responsibility strategy.

Veolia's carbon emissions from its Environmental Services business in the UK for the past 5 years are shown in the table below:

|                    | 2010      | 2011      | 2012      | 2013      | 2014      |
|--------------------|-----------|-----------|-----------|-----------|-----------|
| Direct emissions   | 1,172,619 | 1,159,905 | 1,202,345 | 1,133,663 | 1,244,562 |
| Indirect emissions | 29,905    | 26,416    | 31,837    | 32,766    | 34,219    |
| Avoided emissions  | 1,073,087 | 1,069,245 | 1,168,953 | 1,202,780 | 1,366,912 |



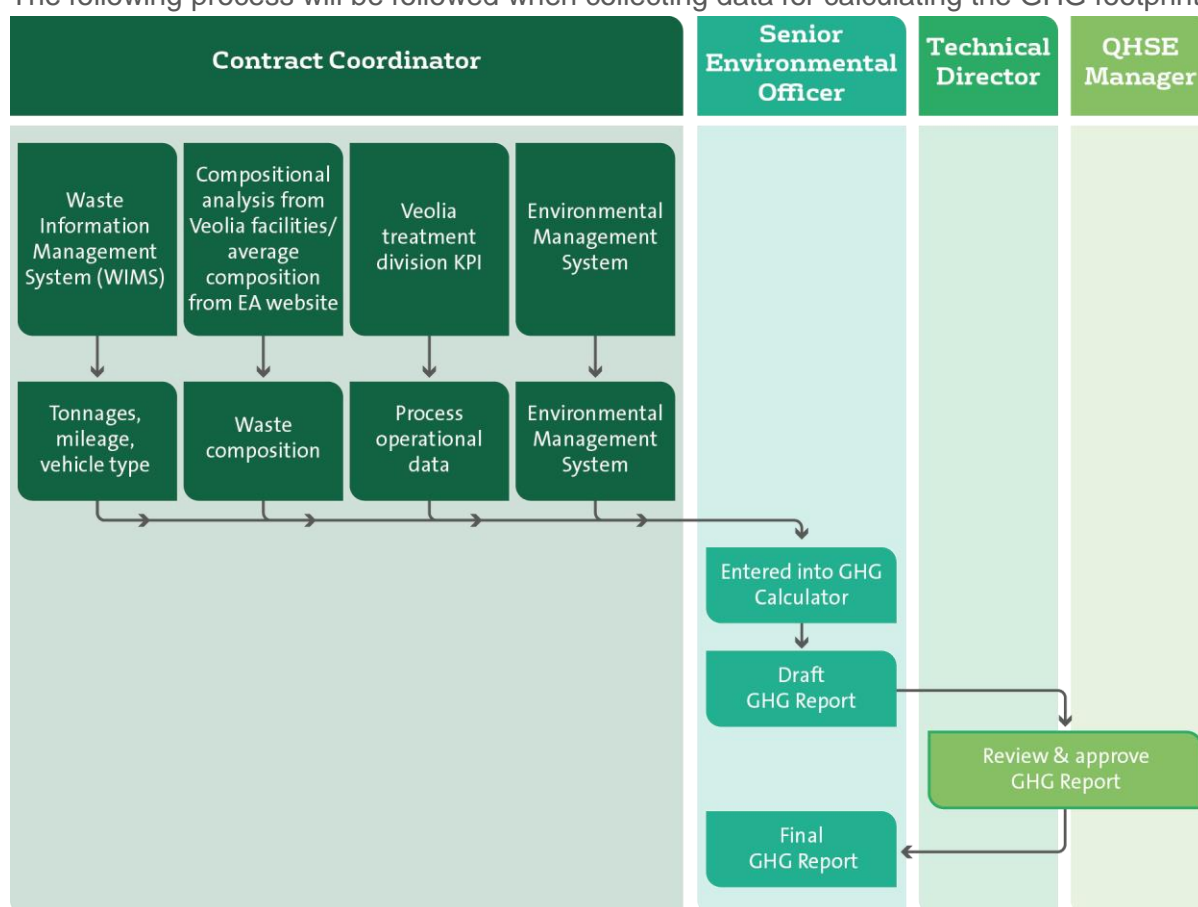
|                          |      |      |      |      |      |
|--------------------------|------|------|------|------|------|
| Carbon Performance Ratio | 0.89 | 0.90 | 0.95 | 1.03 | 1.07 |
|--------------------------|------|------|------|------|------|

### Monitoring of Carbon Impact

Veolia will provide an annual GHG footprint of contract operations using DEFRA/DECC's GHG Conversion Factors for Company Reporting. These are deemed to be Scope 3 emissions or 'other indirect emissions', and are considered to be emissions not owned or controlled by an organisation.

The GHG emission factors used within the DEFRA/DECC methodology are based on fixed operational parameters and give a good estimation of the GHG emissions from transport and waste management operations.

The following process will be followed when collecting data for calculating the GHG footprint:



The annual GHG Report will be reviewed and approved by Veolia's corporate Technical Director, the Contract General Manager and QHSE Manager. Objectives and targets will be set and reviewed each year within the Report to enable ongoing carbon reductions throughout the life of the Contract.

Veolia will use its internal Greenhouse Gas (GHG) Tracker tool to set a CPR benchmark for monitoring the carbon footprint of the Services and drive improved environmental performance over the life of the contract.

The GHG Tracker processes the following operational data to provide an assessment of the carbon footprint of the Contract as outlined in the diagram below.

- Tonnes of waste/recycling
- Types of waste
- Disposal location
- Miles travelled
- Treatment process

Veolia will monitor the carbon impact of the services and continue to explore ways to improve operational efficiency and implement new technology where available to minimise the impact our operations have on the environment and air quality.

### Environmental Impact Control Plan



Veolia is committed to reducing its environmental impact for the SLWP Contract by:

**Reduced Climate Impact** – Veolia will endeavour to keep the Carbon Performance Ratio for this Contract below 1 throughout the Contract period.

**Reduced Emissions from Plant & Vehicles** – Veolia will use Euro VI vehicles with electric bin lifts. Implement Driving, Efficiently and Safety Programme

**Using Recycled Materials & Reducing Waste** – Collection of addition materials (WEEE, Batteries & Textiles), Reuse of Bulky Waste

**Reduced Energy Consumption** – Veolia will use energy efficient lighting at the depots. We will replace equipment with items from the Energy Technology List where appropriate.

**Reduced Waste consumption** – We will seek out innovative cleansing techniques that rely on reduced water usage. We will reuse water where possible, such as vehicle washing and street sweeping.

**Raising Awareness and Understanding among Staff** – Staff will be inducted with information and discussion on environmental responsibility and staff will be encouraged to take part in Environmental Action Days and local community activities.

## 3.5 Energy Reporting Assessment

Veolia will undertake a high level energy audit at each of the sites to assist in identifying projects to reduce site running costs and reduce carbon emissions. A site audit report of our Wiggshall Depot in Watford is included in Appendix 10a for information. This survey identified 18% energy saving with an overall payback period of approximately 2 years, which included projects relating to lightening and heating.

Veolia commit to undertaking an Energy Assessment for each site within 12 months of Contract start and action any projects identified which are cost effective to undertake.

## 3.6 Assets and operations carbon reduction

Veolia will reduce transport carbon from assets and operations by proposing:

- Optimal vehicle / waste movements via the use of ECHO and Tranvision which is a planning and mapping tool. Regular monitoring of rounds and route optimisation will

improve the service to customers, as well as reducing fuel consumption and carbon footprint. It records performance data from vehicles that are part of specific contracts using GPS tracking, on-board vehicle computers, and vehicle telematics.

- Increase the recovery of Recyclates through optimised collection frequencies.
- Veolia will report GHG emissions from the service on a quarterly basis in accordance with the DEFRA guidance on reporting GHG emissions and the GHG conversion factors for company reporting for the relevant year.

### Veolia's Bespoke Greenhouse Gas Tracker

*Veolia has been reporting its direct (scope 1), indirect (scope 2) and avoided GHG emissions since 2001 using an internal methodology. It uses input from the Key Performance Indicator (KPI) data within the Municipal Information Management System (MIMS). This ensures that the results are robust and auditable. The methodology and assumptions of the tracker have been validated by Ernst & Young.*

*It is important that Veolia also reports avoided emissions (scope 3) to enable the CO2 benefit for materials and energy recovered at its facilities to be considered. The DEFRA GHG conversion factors contain emission factors for calculating scope 1, 2, and 3 emissions, and the avoided emissions from recycling using life cycle factors for waste disposal.*

*Mandatory GHG reporting was introduced from April 2013 for all FTSE companies and this applies to Veolia. The reporting of scope 1 and 2 emissions is mandatory, whilst scope 3 emissions will be voluntary due to the difficult nature of establishing these emissions.*

*Veolia proposes that scope 1 and 2 emissions will be reported using the guidance and emission factors from DEFRA, as well as the avoided emissions using the life cycle conversion factors to account for materials and energy recovery in relation to the Partnership. Scope 3 emissions may be reported at a later stage depending on internal developments in collecting the data required to calculate these emissions.*

- *Scope 1 - direct emissions from fuel combustion, owned transport, processes and fugitive emissions*
- *Scope 2 – indirect emissions, consumption of purchased electricity heat, steam and cooling*
- *Steam 3 – other indirect emission, purchased materials, commuting, business travel and sold goods/services.*

Veolia utilises an internal environmental reporting tool called E-reporting for monitoring and reporting CO2 produced in relation to buildings, vehicle operation and in relation to commuting to and from the work place. This tool is used by Veolia to calculate its annual GHG emissions as reported in its Annual Review. Specific data for the Partnership will be recorded within this tool annually such as tonnes of waste collected, materials recycled and mileage. Specific annual data can be provided from this tool to the Partnership as requested. Veolia's initiatives include: -



Veolia has implemented a number of schemes to reduce electricity use across our operations. In addition to replacing normal lighting systems with motion sensor lighting, we have recently implemented the 'Night Watchman' scheme which is an automated system that shuts down PCs after a set period of inactivity. A reduction of around 5% has already been achieved as a result of this measure.



Veolia has a nationwide programme under way to move away from 'big bottle' water supply to purified and chilled mains supply. Not only has this initiative been beneficial in terms of reducing the volume of plastics wasted, but also in terms of the associated carbon footprint. Veolia's bottled water consumption resulted in a burden of 11 tonnes CO<sub>2</sub> annually, excluding the transport impact of delivery. Consequently implementing a new plumbed in system in all locations will reduce these emissions by 95%. Furthermore using filtered tap water avoids the significant carbon emissions that result from the production and delivery of the bottled water.



Veolia promotes sustainable travel to our entire workforce. This includes the promotion of our 'Cycle to Work' scheme. Staff will be encouraged to travel to work via public transport which is documented in the Veolia Staff Travel Policy



In terms of business travel, the Veolia Company Car Policy specifies that all cars must comply with a limit of 129 gCO<sub>2</sub>/km or lower. Veolia will regularly review this target down and whether there is an alternative travel allowance which encourages the use of public transport where available or advantageous.



Furthermore, where possible we aim to reduce any unnecessary travel, through the introduction of virtual workspaces. We have increased the use of desktop sharing and the use of our instant messenger service, Google Hangout, which all employees have access to. Additionally, we have increased the number of virtual meetings through the use of conference calls and video conferencing to reduce the number of miles driven by our management and support staff.



Veolia will use RIVO to monitor the environmental performance of the Services. RIVO allows all performance information to be visible, and enables trends to be identified and the appropriate action to be taken to mitigate and minimise environment related issues. There are currently over 2,000 users of RIVO within the Veolia group enabling users to maintain accurate environmental records.

## RIVO Safeguard System

*RIVO Safeguard is an internet based reporting system hosted by RIVO Software Ltd. This web-based tool allows all environmental accidents, incidents and near-misses to be reported by any user, such that on-line reports are generated. The system assigns an accountable person to take actions, the progress of which are tracked through standard reporting and form the subject of regular management reviews, thereby driving operational excellence. The assignment of individuals directly involved with the process within the system allows clear lines of communication, direct accountability and management transparency of all environmental issues, and includes the functionality within the process to capture Environment Agency reportable issues.*

*There are three main categories of reportable data that Veolia will routinely record*

### 1. Event Reporting

- *Accident - an event that results in physical injury.*
- *Incident – an event that results in damage to property, equipment or the environment but does not incur injury or ill health. An unintentional and/or uncontrolled escape of materials of a nature and in a manner capable of causing significant injury or harm*
- *Near Misses –an event which does not result in an injury or harm to any person, property, equipment or the environment.*
- *Hazards & Safety Concerns – an issue that has been identified or observed that has the potential to cause an accident, incident, near miss or which is an environmental concern.*
- *Any communication from an Enforcing Authority.*
- *RIDDOR – Reporting of injuries, diseases and dangerous occurrences.*

### 2. Auditing Reporting

- *Audit reports and associated tasks will be logged onto RIVO Safeguard and notified to the relevant managers with a timescale for closure. Evidence will be required from the Site Managers for these tasks to be closed out by the auditor in a timely manner.*

### 3. WorkSafe Observations

- *WorkSafe Observations (Behavioural Safety) will be recorded on RIVO Safeguard both positive and negative behaviours observed during route activities.*





## 4. QEHS Management System Implementation

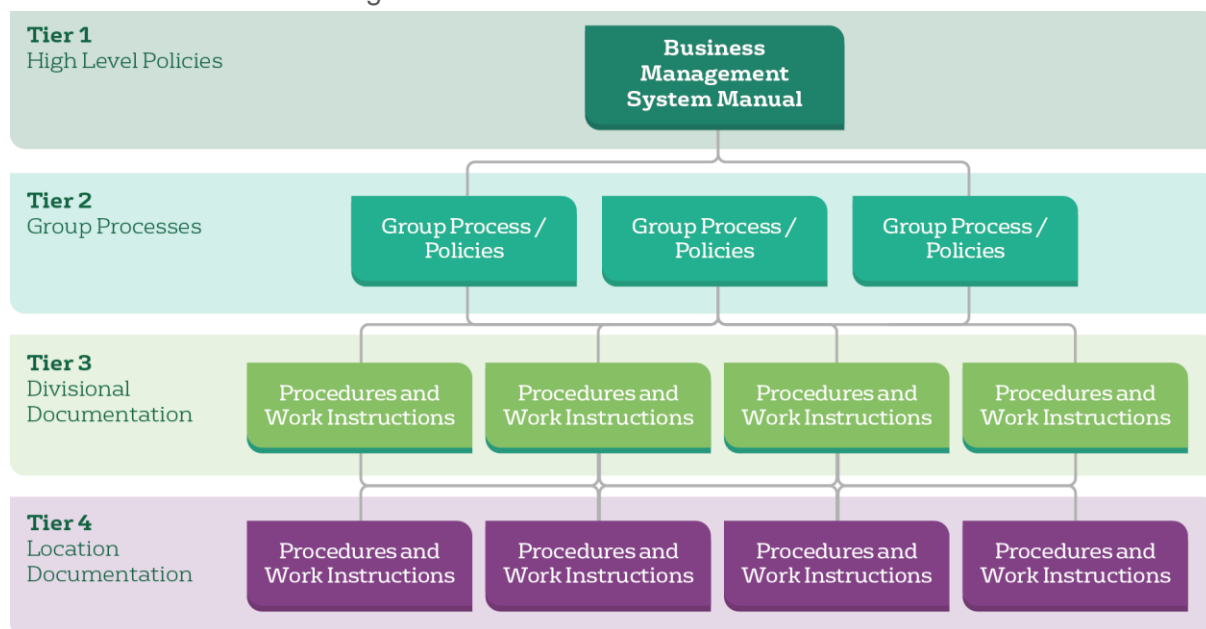
### *How the QEHS Management Systems to be implemented will function in relation to the Service*

Veolia has developed an integrated management system, its “Business Management System” (BMS) which is externally certified to ISO 9001, ISO 14001 and OHSAS 18001.

All the activities undertaken as part of the Veolia's business are expected to be carried out in a controlled and legal manner, to be safe, not to cause damage to or adversely impact the environment and to meet or exceed the expectations of our customers and stakeholders, including regulatory authorities. These activities are prescribed as a series of policies and procedures which form part of Veolia's intranet based BMS.

Control is maintained via a single point of contact for system administration. A dedicated email facility has been established for the receipt of new procedures, change requests and feedback. All hard copies will be deemed uncontrolled. These documents are regularly reviewed for effectiveness in operation by means of the BMS reviews and internal audits.

The BMS structure contains 4 tiers of documents. At the top level, Tier 1 is the manual and all system policies. Tier 2 contains Veolia's Group processes and procedures. Tier 3 contains documents that are relevant for individual business units (i.e. this Contract). Tier 4 will contain documents that are specific to the location (e.g. site rules). Process and procedure owner responsibilities will be defined and will include requirements to regularly review relevance and adequacy of documents in consultation with users and related process owners illustrated in the diagram below.



### Environmental Risk Assessment

As an integral element of certification to OHSAS 18001, the Contract will operate to a number of our corporate risk assessment procedures. Generic risk assessments will be prepared by the corporate QHSE Team. The local Contract Management Team will be responsible for carrying out local specific risk assessments. All activities/tasks undertaken by

personnel or sub-contractors will have a risk assessment performed first to identify any hazards which may be likely to cause injury, damage or environmental harm. The risk assessment will be completed by a trained person (Managers and Environmental Managers will be trained to conduct risk assessments) supported by our London Regional QHSE Manager.

Risk assessments independent from site users will be carried out for all sites and all activities according to our BMS Procedure. These risk assessments will ensure that Safe Systems of Work are employed and that risk is minimised, wherever possible. Our risk assessments safeguard the health and safety of our employees, sub-contractors and premises by systematically identifying potential risks and applying the appropriate preventative measures. They will comply with statutory requirements and seek proactively to prevent ill health, injury, damage and loss arising from our operations and activities. Veolia has a programme for health surveillance on all of our contracts which checks the risks associated with the activities carried out under the Services.

During Mobilisation, Veolia will create risk assessments for the Services to identify:

- All the risks to health and safety of any person arising out of, or in connection with, work or the conduct of their undertaking.
- All the potential impacts on the environments in which activities are conducted.
- All the risks associated with the Services delivered to residents and the impacts on the combined reputations of Veolia and the Partnership.

### Health & Safety Training

During Mobilisation, all new management and operational staff will be inducted and provided with Health and Safety training, including any current staff that need refresher training. Topics covered during induction will include general health and safety awareness (first aid, fire, safe practices, safety first when working in public areas, hazards and risks and customer care), methods of operation, practical manual handling training, familiarisation with vehicles and equipment and environmental awareness and spillage control.

The induction sessions will include detailed Health and Safety talks on topics including methods of operation, manual handling, First Aid and familiarisation with new vehicles and equipment, using our unique hazard identification exercise as a tool. Safety training will either be carried out by the Veolia's Divisional QHSE Manager or Campus Veolia.

Examples of a few of the courses provided by Campus include:

- Fire training
- Risk assessment
- IOSH 'Managing Safely'
- Behavioural Safety in the workplace



- Manual handling
- NEBOSH General Certificate
- Environmental Awareness / Legislation

The majority of training is 'on-the-job' and practical, delivered via toolbox talks or practical demonstrations, supported by pictorial material, and accompanied by classroom presentations as deemed appropriate.

At Veolia, we maintain a training matrix for each member of staff and this will be extended to all transferring employees on the new Contract. It will identify the safety training requirements and ensure that a record of all safety training is held on the staff member's personal file. Training will be reviewed every 12 months or at a more frequent interval if deemed necessary by line management. Training is ongoing, in particular following changes in policy, legislation, any incident or our ongoing monitoring and inspection arrangements for the contract. All operatives will undergo refresher training periodically, and as necessary. An example matrix is provided in Method Statement 5 section 4.4.



Veolia has developed various training manuals and, by adding the strength of its corporate organisation and the local knowledge, crafted some very specific manuals. Veolia has a diverse workforce, representing a range of languages and literacy levels. We have developed manuals that are heavily pictorial to ensure that staff with low levels of English literacy are not disadvantaged. Pictures of best practice and bad practices remove the need for long-worded training documents, which are more difficult to read and understand for the operatives. These manuals have proved to be extremely effective and well received on Contracts nationwide.

Quality, Health and Safety and Environment information is made available to employees through QHSE Alerts, Toolbox talks, Environmental Briefings and awareness aids, such as our 'RAE' campaign (Risk Assessment Expert). These posters and awareness campaigns help to raise operational environmental risks relevant to a particular business sector.

Meetings at site, divisional, support and senior management occurs at regular intervals, which includes a review and discussion of QHSE matters.

New employees will be inducted in to Veolia's WorkSafe system and trained to report any unsafe situations and/or behaviour via the Near Miss reporting system.

In 2015, our Health and Safety achievements included the following:

- A reduction in our Lost Time Injury Frequency Rate of 18%, well ahead of our target of 10%
- We won a Royal Society for the Prevention of Accidents (RoSPA) Occupational Health and Safety Gold Award, and the Preventive Health category of the Global Social
- Initiative Awards in conjunction with Transport for London and Cycle Confident, we delivered safe urban driving training to hundreds of drivers across the capital

In addition, as part of our Think Safe, Work Safe, Home Safe behavioural safety management programme is the Sleepsafe campaign. This campaign was launched this winter to raise awareness and encourage our operatives to stop a rough sleeper from being injured, particularly by:

- Checking the waste bins before they are tipped
- Shaking large bins for any signs of life
- Reporting any rough sleepers to an Environmental Manager or Supervisor.

## 5. Monitoring and Auditing

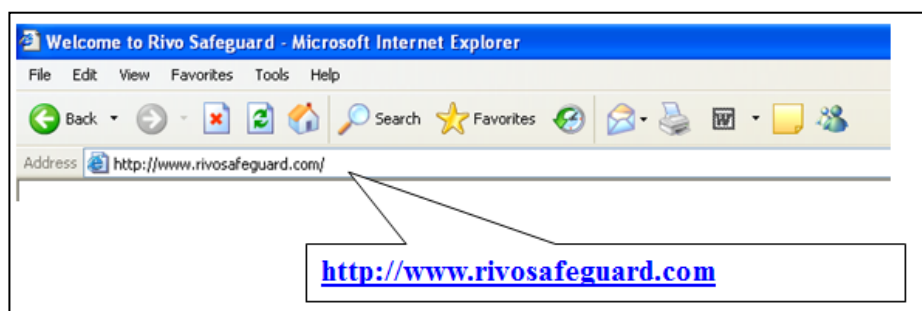
***How the QEHS Management Systems will be monitored and audited both internally and externally to ensure compliance . including frequency of such audits (required at CFT stage only).***

Veolia will audit and monitor both internally and externally to ensure compliance. This will be undertaken by the following methods:

### 5.1 Auditing

- As part of our accreditations to ISO9001, ISO14001 and OHSAS18001, an audit programme is established, documented and implemented, which objectively evaluates the adequacy and effectiveness of the Management policies and procedures and its compliance with legislation and regulatory requirements. All activities are audited at least once a year as per the audit schedule. Veolia uses internal audits undertaken by our own audit team who work within QHSE.
- To ensure that Veolia is fully compliant, external audits are undertaken by Lloyds Register of Quality Assurance (LRQA).
- Audit reports are recorded onto RIVO Safeguard which allows the online, live management of tasks generated from the audit. Where actions are required as a result of the audit our General Manager will have a period to correct any discrepancies in the management processes relating the health, safety and welfare of all staff, and will also include any defective working practices. Veolia is committed to ensuring that all staff work safely and effectively, however we are also open to

suggestions and will always work to improve working practices as and when necessary.



- In order to ensure that Veolia's policy regarding Health and Safety remains effective, Veolia will continually analyse audit findings, which include an agenda for each Site Management Review. All audit findings that may have an impact upon the integrity of the Management System are included in the agenda of the Corporate Management Review agenda. Compliance is then verified and certified by external assessors LRQA.

## 5.2 Monitoring

- To ensure the safe and smooth running of the Sites, and the wellbeing of both employees and Service Users, daily inspections will be carried out by the supervisors on all sites, using the handheld PDAs to record results and allocate corrective action (where it cannot be immediately rectified) before the sites are opened.
- Veolia will undertake regular risk-management surveys, incorporating consideration of general health and safety, environmental management, Site security, visitor safety and vehicular transport movements. Sites and vehicles will be assessed for legal compliance, local management controls and implementation of best practice. All documentation and systems are audited and site inspections undertaken. Health and Safety records will be made available for inspection upon request.
- Veolia utilises a proactive and reactive approach to monitoring in line with our management procedures. Veolia's contract management team will be responsible for ensuring that regular operational monitoring of health and safety issues is carried out and recorded. Monitoring may be delegated to a suitably trained and competent person. In most cases the Supervisors will carry out the bulk of the monitoring, to ensure that this is carried out effectively, Veolia has developed a training method known as 'Work Safe'. This will ensure that staff carrying out the monitoring are competent.
- As part of the Environmental Managers daily routine they will be expected to carry out inspections on the work being carried out that will cover all aspects of the Service. Inspections will follow set criteria that will ensure that all operatives and crews are working safely in line with Veolia's health and safety policies and procedures. The inspections will also ensure that the standard of Service provision is being delivered to a high standard, in line with the SLWP's policies and procedures.





- Veolia will ensure that Monthly observations/inspections of working practices in line with procedures and policies are complied with, high standards of health and safety are maintained and potential weaknesses in the system are identified; this includes traffic management, fire provisions, site signage and compliance with safety rules and regulations. Inspections/observations are carried out using set checklists on the handheld PDAs that link directly to the online databases, and which incorporate topical issues for all of the Specification's service areas. Action plans are created to address any observed non-compliances or issues, in order to re-establish safe working practices.
- All operational vehicles and crews working within the contract will be randomly monitored carrying out their normal duties. Any hazards/potential hazards identified by the monitoring inspection will be recorded on the Operational H&S Monitoring Form and addressed by the General Manager so that the risk of injury or loss is eliminated or minimised so far as is reasonably practicable.
- In addition to monthly inspections, Veolia will undertake annual risk-management surveys, incorporating consideration of general health and safety, environmental management, site security, visitor safety and vehicular transport movements. All Sites used in the Contract and operational activities will be assessed for legal compliance, local management controls and implementation of best practice. All documentation and systems will be audited and site inspections undertaken.
- Veolia's Regional QHSE Management Team will undertake regular audits to complement annual risk-management surveys, and to ensure compliance with Veolia's Business Management System (BMS). Any required actions / improvements will be recorded on the RIVO Safeguard system and a "Task" raised against the appropriate Manager.
- RIVO is used to facilitate the rapid generation of reports and trend analysis and readily identify those work areas where risks need further reduction. When incidents are reported alerts are generated prompting managers to undertake investigations with suggested corrective measures. Rivo Safeguard also provides the capability to identify and analyse trends which may be presented.
- Veolia will ensure that all sub-contractors follow the same H&S standards as those of our own employees. Contractors will initially have to be approved by our procurement department who will look at all the safety standards requesting a copy of their Health and Safety, Codes of Practice and Safe Systems of Work. They will also look at the quality assurance, insurance certificates, financial viability and history and competence of carrying out the work references.

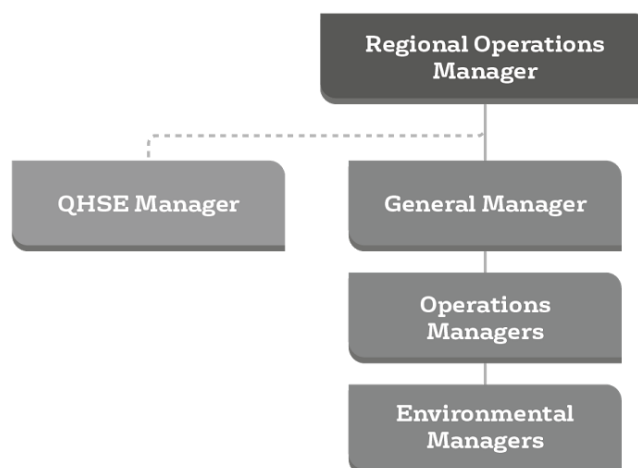
## 6. QEHS Roles and Responsibilities

*Which member(s) of staff will be responsible for the QEHS Management Systems for the Contract. This should include the staff management structure and corporate and local staff resources to deliver compliance. (required at CFT stage only).*

### 6.1 Contract Staff Members

The following table lists the Contract Staff Members who will be responsible for the QHSE management systems.

| Position              | Contact Details                           |
|-----------------------|---|
| General Manager       | <i>Details provided at Contract Award</i> |
| Operations Managers   | <i>Details provided at Contract Award</i> |
| Regional QHSE Manager | Simon Johnson                             |



## 6.2 Contract Responsibilities:

### General Manager

- Overall responsibility for the implementation of the QHSE Systems and will ensure that the Contract is managed in accordance with the Permits, planning conditions and other legislative requirements.
- Responsible for the site accreditation process to ISO 14001.
- Ensure that arrangements are in place to monitor by inspection and measurement the environmental and energy parameters identified in the Environmental and Energy Management System Plan.
- Establish local objectives and targets including, but not limited to, those set to address corporate and divisional objectives and targets.
- Ensure that all accidents, incidents, instances of non-compliance are recorded on RIVO, tasks set to address any issues raised and close out monitored until complete.

### Operations/Environmental Managers

- Communicate relevant information to site staff by formal and informal form.
- Toolbox talks.
- Local management review meetings.
- Audit action reviews.
- Feedback from near miss, accident and incident investigations.

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### Regional QHSE Manager

- Provides relevant and timely information and instruction to the business in order to facilitate regulatory compliance and maximize environmental performance.
- Attends review meetings.
- Assists on issues as requested by the General Manager or QHSE Manager.
- Assists in investigation of accidents, incidents, near misses, non-compliance.

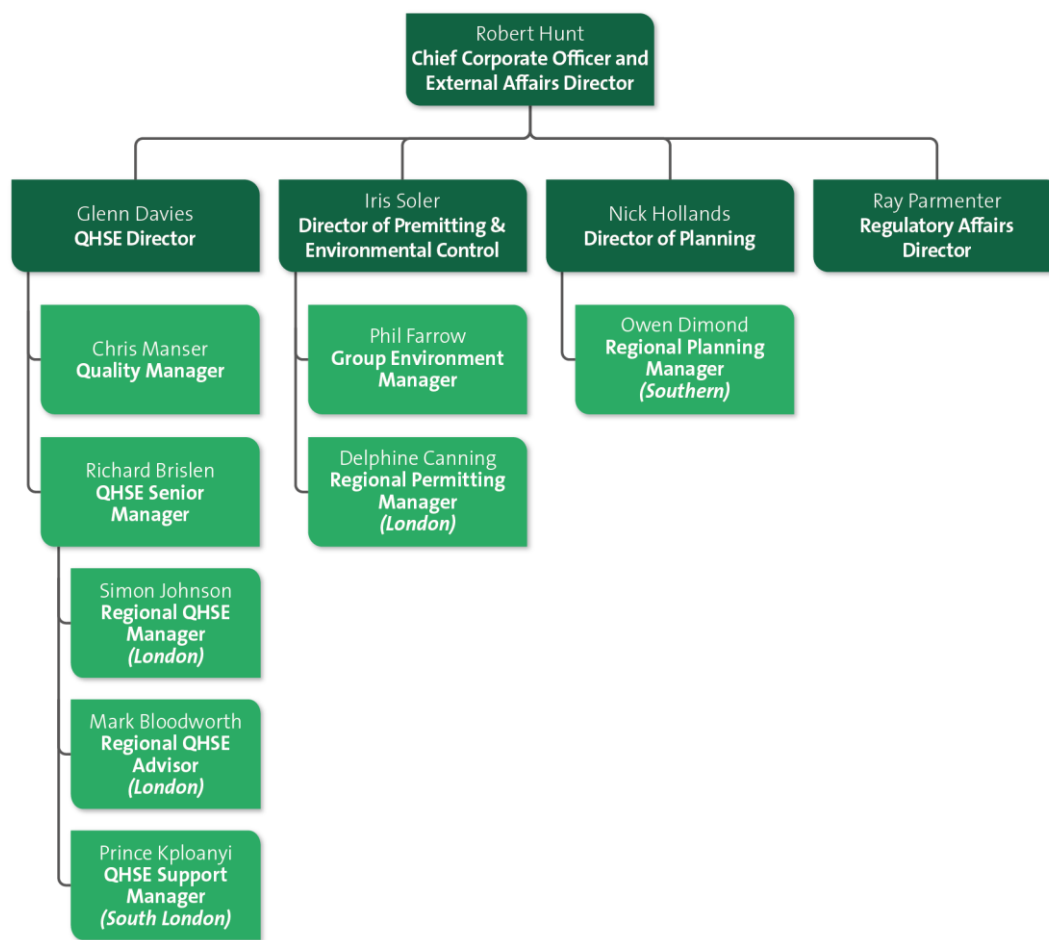
### QHSE Manager

- Environmental and energy management of all Sites, Works and Services for the duration of the Contract Period.
- Delivers and maintains an effective audit programme.
- Provides advice and guidance on QHSE issues.
- Identifies unsafe non-compliant working practices, systems and procedures and makes recommendations for remedying any defects found.
- Investigates the circumstances of accidents, dangerous occurrences or incidents which would harm the environment, making recommendations on the prevention of further accidents and reporting to line management and the QHSE Director.

## **6.3 Corporate Responsibilities**

Veolia has an 'in house' team of QHSE professionals with a broad knowledge and experience of the field that can provide assistance on a day to day basis. Compliance with legislation is managed at a corporate level, to reflect the seriousness with which Veolia treat it as a business. Our QHSE structure ensures compliance with the many pieces of new and emerging legislation that impact our day to day business activities.

The General Manager will report monthly on safety and environment to their Director/Regional Manager through their normal business line management reporting system. The Directors/Regional Managers will report on safety and environment as part of their Monthly Board Reports.



## 7. Enforcement

All instances of non-conformance are reported and managed via the RIVO reporting system to ensure timely and effective corrective actions is taken and subsequently analysed in accordance with the procedure for Management Review. Management Reviews are used to identify areas of potential change and improvement and to define appropriate corrective/preventative actions and their deployment. All management reviews are recorded and minutes from any formal meeting are circulated to attendees and locations as appropriate. The levels of management review are at a site level, regional management level, director review and an annual corporate review.

These reviews at successive levels of the organisation include reporting on:

- Audit Action Status, including schedule/significant issues or findings, overdue,
- QHSE performance
- Objectives
- Customer/Interested Parties Feedback
- Business Management System Changes
- Forthcoming changes to business

As part of the monthly management reviews the General Manager will review the list of tasks and ensure that all tasks that were due during the preceding month have been completed. Any tasks that were not completed will be progressed without delay. Outstanding tasks will be tracked through to completion. Each month the General Manager will also review tasks

identified for the forthcoming month to ensure that arrangements are in place to ensure the tasks will be completed.

## 8. Added Value

Veolia will add value to the Contract by committing to the following safeguards and constantly reviewing methods to reduce emissions and fuel savings over the life of the Contract:-

### Cyclist Safety

Veolia take all safety standards seriously and work with leading industry figures to ensure that we are doing all we can. The cycling safety scheme has been developed with advice from Transport for London, the Fleet Operators Recognition Scheme of which Veolia is a Gold member and the Construction, Logistics and Community Safety (CLOCS) Scheme. Veolia understands that the London Borough of Sutton has adopted the CLOCS standards and confirms that our approach to cycle safety is compliant with the CLOCS requirements attached at Appendix 10b.



In line with Cycle safety, Veolia has developed a Safer Lorries pledge. Veolia will ensure that vehicles for SLWP are fitted with the required equipment as detailed below:

- A close-proximity warning system (visual or audible) to make the driver aware of cyclists and pedestrians who might be hidden from view. This can include an appropriate CCTV or Fresnel lens where this provides an adequate alternative.
- All Veolia's collection vehicles are fitted with a side and rear-working camera. The side camera gives the driver visual evidence of anything passing on the near side, including cyclists.
- Sideguards, and prominent signage in the rear of the lorry warning cyclists not to undertake.
- All vehicles that Veolia will purchase will conform to the class IV mirror requirement and all new collection vehicles will display the cycling awareness sign on the rear near side of the vehicle.
- Audible warning will be fitted on the rear side of all new collection vehicles to warn cyclists when vehicles are turning left.



### Turn Alarm

As one of the largest fleet operators in the UK it is vital that we do all we can to protect drivers and the general public, which is why we have recently announced a £1m investment in all vehicles over 3.5 tonnes GVW. The





investment will include using Vision Techniques “TurnAlarm” systems across the refuse management fleet. Every Veolia vehicle over 3.5 tonnes will be fitted with enhanced audible and visual awareness when turning, reducing the risk of accidents involving cyclists, until now these safety standards have only been fitted to vehicles over 18 tonnes. These will be included within all appropriate the Partnership Vehicles.

This aims to ensure all drivers avoid any unforeseen accidents and protects vulnerable road users, including cyclists. The TurnAlarm functions as both an audio and visual warning to approaching cyclists; high intensity LEDs flash from its side mounted position and a high volume speaker provides audible warning that the “vehicle is turning”. The contract also includes a module to measure speed, preventing the alarm from activating over 10mph and cautionary blind spot signs for the rear and near side of the vehicle.

Veolia has worked with London Local Authority partners to jointly fund cyclist awareness training either directly or via Transport for London (TFL). We are now in the process of delivering this vulnerable road user training across the country’s largest waste fleet, which will include all drivers on this Contract. All drivers will receive 3.5 hours of training focussing specifically on the dangers and care needed when encountering cyclists, pedestrians and motorcyclists.

### Fuel Saving

With the largest waste fleet in the country, Veolia are constantly working to reduce fuel costs. To this end, we work closely with vehicle manufacturers to influence design. One such example is Veolia’s work as an ‘innovation stakeholder’ in the development of the Dennis Eagle Fuel Saver Pack which used 15% less fuel than standard Dennis vehicles following trials and extensive feedback from Veolia contracts, which will be employed on the SLWP contract.

Veolia has specified 39 no. Fuso Canter Hybrid chassis’s as part of the street cleansing/collection support fleet. The Euro VI compliant Canter Eco Hybrid has a powerful hybrid drive system, the electric motor uses energy recuperation to support the combustion engine, along with the standard stop/start function and DUONIC transmission reduce fuel consumption by around 23% and reduce CO2 emissions. The engine facilitates saving of fuel while driving whilst tanking energy when braking which then drives an electric motor that assists the combustion engine both at moving off and during acceleration. The start/stop function switches the engine off when it comes to a standstill, and starts it again when the vehicle is ready to move off.



The clearly legible hybrid display shows the driver the current state of charge and the energy flow display shows when energy is being used or regenerated allowing them to amend their driving style.



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### Fleet Emission Reduction

Veolia is always looking to new technology to ensure that the fleet remains as efficient and effective as possible. We have a strong continuous improvement culture which revolves around creativity and innovation. We have established strong relationships with a number of like-minded major suppliers and vehicle manufacturers, including Dennis Eagle and Terberg, who provide us with a wide range of innovative products to trial and assess on municipal contracts.

Veolia's commitment to reducing the environmental impacts of vehicles is not just restricted to frontline RCVs or plant. We launched a fleet of 28no. Toyota Auris Hybrids for the Commercial Services salesforce in 2012, resulting in significant fuel and CO2 savings, with the cars routinely completing 700 miles to a single tank in addition to financial savings on Road Fund Licencing.



More recently, we have concluded a trial of Mercedes Fuso Diesel/Electric hybrid vehicles and the Effenco hybrid stop-start system in the London region to assess their operational benefits. The results of the trial are being considered to determine the benefits of widespread operational implementation. As stated previously we have specified the Fuso Canter hybrid vehicles for the SLWP contract.

