

**C.Scope International Ltd**  
**Environmental Audit/Review**

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### ***Environmental Management Policy Statement***

The policy of C.Scope International Ltd is to continuously manage its' operations in a responsible and ethical manner, with the aim of achieving best practice in all aspects of Environmental Management. The Company is committed to improving the environment and reducing pollution.

The Company is committed to working to relevant environmental statutes (e.g. Battery, WEEE and RoHS Directives) and common law at all times.

The systems for managing the environmental impact of the Company are developed around the best practice guidelines available in our industry.

It is a Company commitment that Environmental Management is maintained at a visible level at all times and that awareness is continuously promoted to staff and users of the business premises, facilities and services. It is also a commitment that the Company will endeavour to improve its own environmental performance on a continual basis.

Environmental Management is an integral part of the management of any process or area within the operations of the Company with leadership, ultimate responsibility and guidance from the Managing Director. The Directors and all Managers are responsible for minimising the environmental impact risks arising from, or connected with, any work or area they control. This ultimate ownership and accountability is never delegated to other organisations or contractors.

The Company is committed to providing adequate resources for training, implementation, and maintenance to manage this policy

The Operations Director is the nominated person to fulfil the role of competent person within the Company. The Company through the nominated competent person seeks to maintain an effective management system to plan, organise, control, monitor and review measures to control environmental impact. The system is set out in detail in the responsibilities and arrangements documents for the Company, which are made available to, and communicated to, all staff and users of the businesses premises, facilities, services and members of the public.

The Company aims to ensure that the management system achieves the following:

É**Action Planning** - Formulating and implementing action plans for management of risks and where deficiencies are identified that suitable corrective action is taken;

É**Competence** - Ensuring that employees, users of the businesses premises, facilities and services have appropriate skills and knowledge;

É**Impact Assessment** - Effective impact assessment of all operations and workplaces, and identification of appropriate resources to control impact;

- **Workplace Controls** - Implementation and maintenance of effective and appropriate environmental control measures;
- **Staff Involvement** - Consultation and co-operation to ensure that policies, organisation and arrangements are effective and appropriate;
- **Communication** - of policies and procedures to all staff, users of the businesses premises, facilities and services;
- **Supervision** - Of operations, workplaces, employees, users of the businesses premises, facilities and services;
- **Emergency Planning** - and preparing for environmental emergencies
- **Legal Compliance** - Monitoring and responding to new developments in law, regulation, techniques and knowledge;
- **Review of Data** - Monitoring and improvement of levels of refuse and consumption of energy;
- **Performance Checks** - Through inspecting and auditing of all activities measuring performance against plans and policies, and setting targets for improvements;
- **Systems Auditing** - An annual audit of the Company Environmental Management systems is undertaken, feedback is assessed and improvement incorporated.
- **Continuous improvement** - Of the Company policies, organisation and arrangements in light of new developments, and in light of the results of monitoring and auditing.

The highest standards of Environmental Management can only be maintained with the contribution and co-operation of all members of staff and users of the businesses premises, facilities and services who have a duty to report anything, which they believe, poses an impact on the Environmental Management of the Company.

The Company requires all of its contractors or sub contractors to have in place controls to ensure that their performance on behalf of the Company is commensurate with the commitments in this policy,

All staff shall familiarise themselves with this Environmental Management Policy, and keep it in mind at all times when at work.

## **1. Realisation of the Environmental Management Policy**

C.Scope International recognise the impact that our activities have on the environment and are committed to take practical steps at minimising any negative effects these may have. Through our Environmental Management System we are reducing our impact by recycling 100% of our paper and card that is suitable for recycling, promoting efficient use of resources such as electricity and gas, and by correctly disposing of all waste chemicals and electronic equipment using ISO 14001 accredited companies.

We are also committed to the prevention of pollution and demonstrate environmental improvement through:

- Complying with all relevant legislation and other environmental codes of practice to which the Company subscribes.
- Developing objectives that target environmental improvements and monitor performance through regular review.
- Developing a relationship with suppliers, contractors and other interested parties so that we all recognise our environmental responsibilities.
- Improving staff awareness so that they carry out their activities in an environmentally responsible manner in accordance with Company policy.

Our environmental policy is reviewed annually at our management review meetings. This ensures it is kept accurate and in line with the Company targets and objectives. This policy is available to all interested parties on request.

## **2. Operation nature, Scale and activities**

C.Scope International Ltd is an electronics company that design manufacture and service metal detectors and cable location equipment employing approximately 42 full time employees. This is carried out in a building of approximately 5000 square feet.

The Company is small to medium with a turnover between £2 and £5 million.

## **3. Products, processes and services**

The main activity on site is assembly of pre-assembled electronic printed circuit boards into plastic housings for use as instruments to locate metal, pipes and underground services.

The finished product is packaged individually on site ready for sale.

Individual products are generally hand held and weigh typically 2-3kg.

There are processes specialised to the electronic industry such as hand soldering using lead free solder, and there are special foaming processes developed within the

Company to achieve robust and waterproof aerial arrays suitable for industrial applications.

There are no large uses of energy in the manufacture of the products. Most of the energy used within the Company is for light and heat to comply with industry and welfare norms.

All of the plastic housings are specifically made for C.Scope International by selected sub-contract injection moulding companies using tooling owned by C.Scope International Ltd. Plastic content is minimised by the choice of injection moulding over other processes (eg rotational moulding) and the design process. Products are made as small as practicable bearing in mind the ergonomic requirements.

Most packaging is corrugated card based with the occasional use of polyethylene foam in critical areas to protect the product.

Selected solvents and chemicals are used for specialised processes. Some of these substances are classified as hazardous. Special arrangements are made for these substances and they are controlled in accordance with COSHH regulations.

The Company operates only on a day shift basis. Overtime is worked as necessary in the mornings, evenings or at weekends.

#### **4. Environmental awareness and training needs**

Separate individual training records are used to record and monitor ongoing training requirements. These records are discussed at management review meetings.

The Company also uses notice boards and word of mouth to inform staff on environmental matters, updates to procedures and legislation. Each employee is issued with details of the Company environmental policy on induction.

The Company also provides access and training to use a computer network for the majority of staff that contains all the Company procedures policies, minutes of meetings, risk assessments and environmental documentation.

The Company has an active First Aid training program in which we now have 2 fully trained First Aiders supported by the First Aider in another group Company on site, which ensures that there is always a qualified First Aider available in normal work hours.

In addition to the First Aid training we also have 2 fully trained fire marshals that are responsible for the ongoing testing of the fire system to ensure any problems are identified and corrected in case of an emergency as well as ensuring evacuations are carried effectively and safely. The number of fire marshals is to be increased by one. This will bring the number on site to five.

Training needs are identified and discussed at management level in the management review meetings held quarterly.

## 5. **Existing environmental management practices**

The environmental policy is posted in reception, in our canteen and on the Company notice board. It is signed and dated by the Managing Director. It is also issued to new employees. To ensure the policy effectiveness it is reviewed periodically at the Group Safety & Environmental meetings, along with any other environmental matters.

Responsibility for the current environment management systems is distributed throughout the Company. At the management level, the Managing Director, Operations Director and the Maintenance Manager ensure the system is operating effectively. On the shop floor, the Production Manager supervises activities to ensure all waste streams are kept segregated and that all chemicals are stored using the companies and manufacturer's recommendations.

The Company currently deals with external communication on environmental issues by following its environmental communication policy. The policy details the sources of external communication such as post, email, fax, telephone, in person and via the media and states that all external communication should be passed onto the Operations Director. In order to communicate the Company's environmental performance, an environmental statement/review will be generated annually which details the waste generated and recycled during the previous 12 months together with energy consumption and equivalent carbon dioxide emissions.

## 6. **Relevant environmental legislation and other requirements affecting the activities, products and services of the organisation**

The following environmental legislation applies to the Company as a result of the current activities:

Battery Directive  
WEEE Directive  
RoSH Directive  
PPW (Packaging) Directive

In addition there are directives that cover Health and Safety aspects (e.g. Chemical Agents Directive & COSHH) and the product itself (RTTE Directive). The REACH legislation also applies as C.Scope International Ltd is a downstream user. The concentration of substances of very high concern are less than 0.1% w/w when assessed to the latest issued list (Candidate list 154).

C.Scope International currently has documented procedures in place for ensuring it is always up to date with any applicable legislation. The procedures state that the Technical Director should keep aware all new legislation and be the initiator of the latest requirements in the Company. Reviews carried out between the Technical Director and the Operations Director take into account any changes in Company activities which could result in Company falling under existing legislative requirements and any new legislation that has come into effect since the previous review or have been announced for a future date.

Since incorporation the Company has had no warnings or convictions under environmental legislation.

**7. Historic, current and proposed site activities, products and services**

The site has been used for light engineering (electronic assembly) for approximately 40 years. Before that it was farmland. There is no evidence of residual pollution or contamination from previous or current use. There are no plans to significantly change the buildings, the site or the operations carried out.

**8. Buildings, infrastructure and surrounding physical environment**

The Company has been based at its current site on Wotton Road since 1976. The size of the current building is approximately 5,000 square feet.

There is a car park/storage yard adjacent to the buildings.

The Company currently rents the land and buildings.

The nearest watercourse to the site is a small drainage ditch, the nearest point of which is located approximately 45 meters to the east of the building. This flows in an easterly direction and is anticipated to join the River Stour at an unspecified location to the north of the site.

The site is indicated by the Environment Agency to be one that is located in an area that is likely to flood in extreme conditions.

Environment Agency data reveals that our site is not located within any Source Protection Zones, which have been identified in England and Wales as a major groundwater source (wells, boreholes or springs) used for public drinking water supply.

There is a large sewer passing under the car park/storage yard at a depth of 3m, approximately.

**9. Land contamination**

There is low risk of any contamination and at this stage no environmental screening has been identified as necessary.

**10. Pollution risk assessment**

The Company has identified its requirements under the COSHH Regulations and keeps records of all chemicals in use along with the relevant safety data sheets. Safety data sheets for all chemicals in use are kept in key locations that are accessible by all employees.



The Company has carried out COSHH assessments on all of the chemicals in use and ensured adequate controls are in place and, where there is a requirement, personal protection equipment (PPE) has been issued to employees.

Spillage control measures are in place. A safe operating procedure is in place for dealing with spills safely and effectively. All fluid containers are less than 5 litres in volume limiting the potential risk. Storage of chemicals is controlled by restricting the location and volume held.

## **11. Use of natural resources and raw materials**

Our main raw materials are paper, card, plastics, polyurethane foam, aluminium and electronic components.

All our paper and card is from sustainably managed forests to minimise the use of natural resources.

Wherever possible, all of the printing inks used on products are free from solvents, which can cause damage to the environment.

All packaging used on Company product is re-usable.

All of the plastics are recyclable.

All of our raw materials are stored in our premises. This provides a safe location where the materials can be stored until they are required for production.

## **12. Energy consumption and efficiency**

### Grid Electricity

Most of the electricity we use as a Company is for heating, lighting, air-conditioning and computer equipment. Use of energy in the production processes we utilise, such as soldering, is minimal.

	<b>Year to Mar 2011</b>	<b>Year to Mar 2012</b>	<b>Year to Mar 2013</b>	<b>Year to Mar 2014</b>
Electric kWh	143542	134781	138453	139619
Equivalent CO <sub>2</sub> (T)	78	70.7	66.96*	67.52*
Percentage Change		-9.9%	+2.7%	+0.8%

(\* Using figures supplied by carbonfootprint.com)

### Natural Gas

The Company's only use for gas on site is for central heating via radiators, warm air heating and hot water.

	<b>Year to Mar 2011</b>	<b>Year to Mar 2012</b>	<b>Year to Mar 2013</b>	<b>Year to Mar 2014</b>
Gas kWh	158524	150638	172256	149590
Equivalent CO <sub>2</sub> (T)	29	27.7	31.7*	27.5*
Percentage Change		-4.5%	+14.4%	-13%

(\* Using figures supplied by carbonfootprint.com)

It is thought the weather contributed to the decrease in consumption.

We have two condensing flue boiler systems on site, which are used for our heating systems and for producing hot water for cleaning. These boilers are regularly serviced as per the manufacturer's specification and logged accordingly.

The energy used by the Company is reported at management review meetings and, where appropriate, revised targets set.

### **13. Water consumption, use and discharge.**

The water supply is shared by 3 companies on the site. C.Scope itself has very basic uses for water which include priming the central heating, drinking, hand washing, flushing the toilets. It is not used for any processes although it is noted that Topper International Ltd who also share the water supply do utilise water for pressure washing their boats from time to time. It is not possible to gauge how much water Topper use. Water consumption is monitored on a bi-annual basis.

We do not produce effluent other than in the toilets and kitchen.

	<b>Year to Dec 2010</b>	<b>Year to Dec 2011</b>	<b>Year to Dec 2012</b>	<b>Year to Dec 2013</b>
Water consumed cu m	713	516	542	400
Water To sewer cu m	677	450	515	380
Percentage Change		+5%	+14.4%	-26%

It is believed staff awareness has contributed to the reduction.

### **14. Emissions to atmosphere.**

The production process involves emissions to air to ensure adequate health and safety for staff via fume extraction. Emissions are from the soldering, polyurethane foaming and resin processes (epoxy and styrene). Where possible these emissions are filtered prior to emission and the cleaning of the filters logged. The ventilation is inspected and monitored annually by a ventilation specialist in accordance with current legislation which specifies 14 month maximum intervals.

All emissions are regarded as very low and insignificant to the environment.

## 15. Waste management

The Company produces cardboard, wood, plastics, metals and very low levels of hazardous waste. The Maintenance Manager is responsible for waste management.

The Maintenance Manager keeps records of all waste that leaves the site to enable the Company to measure its environmental performance and demonstrate legal compliance.

The waste figures were provided for the **complete group of companies**:

	Year to Dec 2010	Year to Dec 2011	Year to Dec 2012	Year to Dec 2013	Percentage Change
<b>Non recyclable waste</b>	150 m <sup>3</sup>	125 m <sup>3</sup>	93 m <sup>3</sup>	77 m <sup>3</sup>	-17%
<b>Recyclable card and paper</b>	-	150 m <sup>3</sup>	120 m <sup>3</sup>	90 m <sup>3</sup>	-25%
<b>Recyclable polythene (5% is C.Scope)</b>	-	55 m <sup>3</sup>	60 m <sup>3</sup>	150 m <sup>3</sup>	+250%
<b>Totals</b>	-	330 m <sup>3</sup>	273 m <sup>3</sup>	317 m <sup>3</sup>	+16%

There has been a progressive move to reducing the non recyclable waste and paper/card waste has reduced in the last year. The big increase in polythene waste is largely outside of the Company's control as 95% is produced by a sister company within the group.

We currently use 8 waste management companies to collect and responsibly manage our waste. These companies are as follows: -

Company	Waste Type	Year to Mar 2013 (£)	Year to Mar 2014 (£)
Countrystyle	Paper, Cardboard,	No data, new supplier	Nil, subsidised by recycled material
S.I.T.A	Non-Recyclable Plastic & General Waste	632.70 (40% group expenditure)	809.83 (40% group expenditure)
Wastecare (Silverlining Industries Ltd) & Waste Way Ltd	Chemicals, Aerosols, Dry Batteries, Electrical, Electronic & Hazardous Waste	230.95 (60% group expenditure)	268.14 (60% group expenditure)
PHS	Sanitary Waste	1095.95 (40% group expenditure)	387.6 (40% group expenditure)
PHS Datashred	Confidential	390.00 (40% group	402.79 (40% group

	Paperwork	expenditure)	expenditure)
H Ripley & Co.	Non-Ferrous Waste	No charge	No Charge
Recyclite Ltd	Flourescent Tubes	64.00 (40% group expenditure)	Nil

We have a range of containers on-site to deal with our waste. These include skips for waste paper and cardboard and bins for recyclable plastic. All of our waste is segregated at source by using the dedicated containers and skips we have on-site.

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#### **16. Packaging**

The amount of packaging waste that the Company currently produces is substantially less than 50 tonnes a year which exempts the Company from the producer responsibility obligations (Packaging & Packaging Waste Regulations). We do however have a policy of reducing unnecessary packaging on delivered equipment and also on received goods.

#### **17. Transport and Logistics**

C.Scope International uses contractors to effect delivery of our products. This is controlled on the basis of cost and service level. All consignments are grouped to save energy.

C.Scope International currently does not operate a formal car sharing scheme as most of car driving employees are based over quite a large distance around the South Kent area which makes intra company car sharing impractical. Staff are, however, encouraged to seek sharing opportunities.

The Company promotes cycling or walking to work for employees. Over 50% of Ashford based employees cycle or walk to work. Cycling is growing more popular and the Company has commissioned a new and larger cycle shelter with easier access.

The Company operates 6 Company cars. Unless there are other overriding factors these are chosen for economy and low carbon dioxide emissions. In future electric or electric hybrid vehicles will be considered.

Air travel is undertaken by the Sales staff as is normal to see overseas clients. Such travel is limited and where possible other forms of communication are preferred. The Company use skype for meetings and conversations with overseas clients if feasible.

#### **18. Incidents**

We currently have in place procedures in case of accidents and emergencies. We have

spillage control measures such as booms, absorbent granules and drip pans.

An incident report form has been introduced so correct procedures are followed should an incident occur. These reports are reviewed at Management Review Meetings and/or Safety / Environmental Meetings.

**19. Environmental performance of contractors, subcontractors and suppliers**

At present we require that all contractors, subcontractors and suppliers complete a questionnaire to help us evaluate them as a Company before using their products or services.

We require our waste management companies to be ISO 14001 accredited.

We include ISO 14001 accreditation in the assessment process when choosing suppliers.

**20. Other management or quality standards**

We are accredited to ISO 9001 which has certain environmental obligations.

**21. Landscaping and aesthetics**

The Company currently believe that our site is kept in a good condition both internally and externally. We operate a regular ground maintenance programme, which ensures the site is always kept clean and tidy. The Company has not received a complaint about the condition of the site and no problem areas have been identified.

Since C.Scope International moved into the premises the Company has made investments in improving the appearance of building inside and out for the well being of staff and have adapted its internal layout to best suite the needs of the Company as it has grown.

Our site security is made up of several systems. We currently have a CCTV system in place which is in operation 24 hours a day and records whenever motion is detected. We also have a fence around the site boundary to keep intruders out. Internally we have a maintained ACOP approved burglar alarm. The alarm is monitored continuously.

The site car parking facilities are currently adequate and we do not need to have dedicated parking spaces for clients and visitors.

Site safety is covered by the Company risk assessment system which assesses areas such as the car park. The risk assessments are reviewed on an annual basis.

**22. Biodiversity**

We recognise that our operations have an impact on biodiversity. These operations include purchasing, facilities management, production processes, maintenance, and

travel planning. In order for us to minimise our impact on biodiversity we strive to achieve the following principles: -

- We will assess the impact that our direct and indirect activities have on the environment.
- We will ensure compliance with biodiversity legislation and regulations and where practicable exceed them.

Specifically, we will

- promote the use of recycled paper and paper that comes from managed sources.
- use, wherever possible, suppliers that show a commitment to minimising their impact on biodiversity
- support projects and programmes from our business partners that contribute to the conservation of biodiversity.
- engage with the local community, as far as is practical, in connection with biodiversity conservation initiatives.

### **23. Other environmental issues (noise, odour, particulates)**

C.Scope International contract MESH consultancy to carry out noise surveys to ensure we are operating within the legal limits. Most of our operations do not emit any noise but we do provide ear defenders in one enclosed workshop where an ultrasonic welder emits just audible sound. This is for operator comfort and is not required for protection.

C.Scope International contracted PV Surveys to carry out an asbestos survey to identify the type and location of asbestos on site. The main incidence was asbestos in the roof covering and some wall boards. A risk score was assigned and where recommended removal or encapsulation carried out. Monitoring of the condition of the asbestos is also carried out.

A contractor induction procedure is in place so that contractors working in areas that contain asbestos are made aware of this and other safety considerations before they commence work. Inspection of the asbestos is also carried out after work has been completed.

### **24. Carbon Footprint**

The carbon footprint for the Company has been calculated at 95.0 tonnes for the year Apr 2013 - Mar 2014. This compares favourably with 98.7 tonnes of CO<sub>2</sub> for the year Apr 2012 - Mar 2013. This equates to 2.3 tonnes per employee (c.f. 2012-3 figure of 2.5 tonnes).

There are limited references with which to benchmark this figure, one available is BAE Systems which has a figure of approximately 14 tonnes of CO<sub>2</sub> per employee as reported on their website and another source is from the [www.puretrust.org.uk](http://www.puretrust.org.uk) which

states "As a general rule of thumb a service sector Company will generate approximately 5 tonnes of carbon emissions per employee annually"

## **25. Improvement objectives and targets**

The Company has adopted a target of further reducing our environmental impact by extending environmental training to more staff. MESH Consultants have been commissioned to carry this out in the next few months.

An aspects and impacts register draft has been drawn up and this will be finalised in the coming weeks. This helps to identify where the company has an environmental impact and measures taken to control the impact.

Specific objectives have been identified to improve our impact such as, use of flow restrictors on water taps, minimise our use of paper and other office consumables, for example by double-siding all paper used, reduce the energy consumption of office equipment by purchasing energy efficient equipment and good housekeeping (ask employees to set their computers to go to sleep automatically after 30 minutes of inactivity and to turn them off at night along with printers and copiers), replacing ordinary light bulbs with energy efficient alternatives and PIR fittings where practical to do so, installing a programmable thermostat to regulate temperature in offices and factory, keeping windows and doors closed when the climate is either hot or cold.