



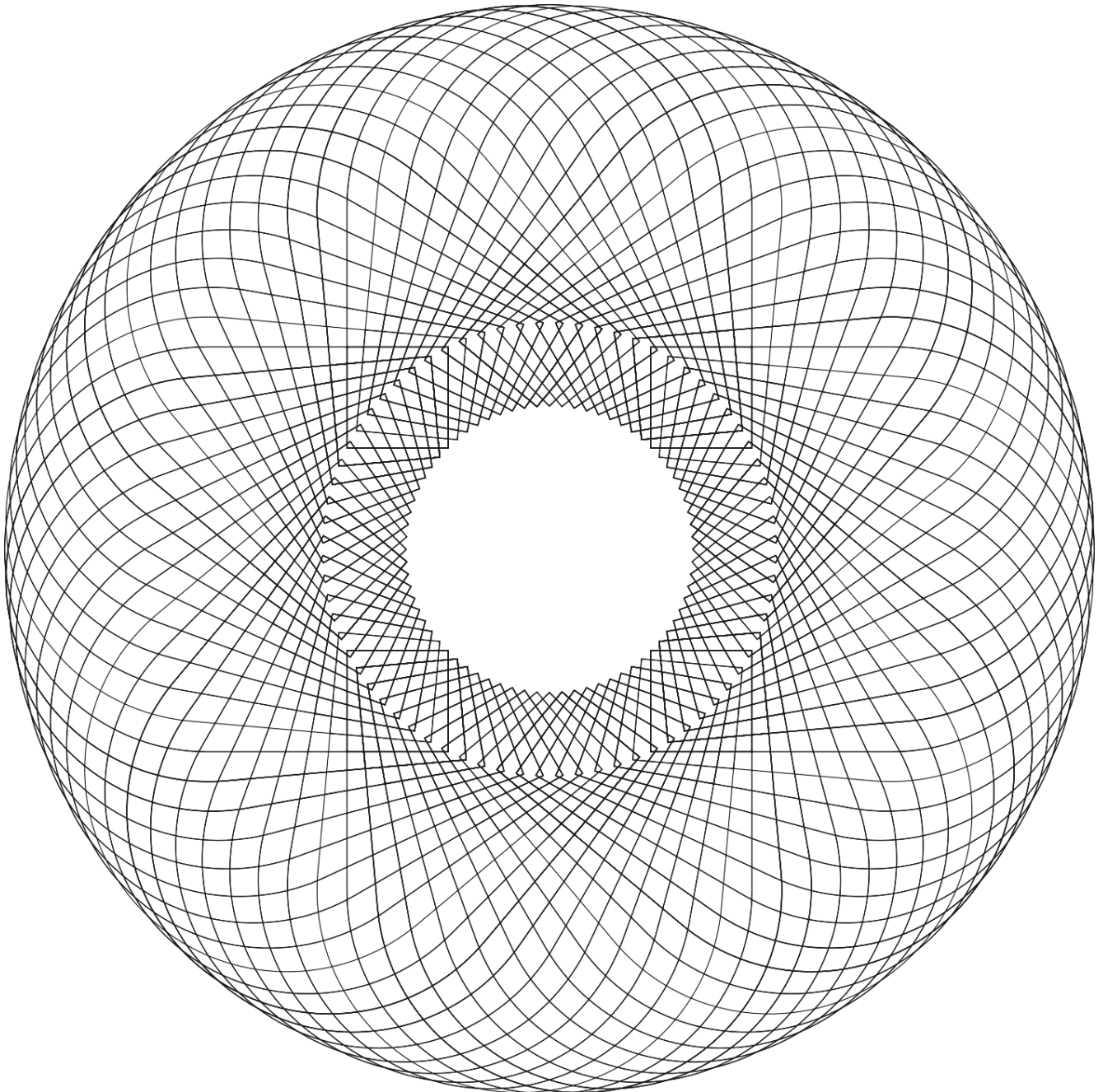
MidGroup

POL06

# Environmental Policy

Latest Review:  
**November 2021**

Reviewed By:  
**Steven Hearn  
Cliff Jones**



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# Environmental Policy

## POLICY STATEMENT OF MID GROUP

This policy applies to all areas and operations of Mid Group incorporating MID Holding Co UK Limited and Mid Contracting & Consulting Limited (hereinafter referred to as Mid Group) undertakings. The company has a Business Management System based on the requirements of ISO 14001:2015.

Mid Group's principal operations are undertaken within the construction industry for various clients. We recognise that our operations interact with the environment and are firmly committed to eliminating or reducing adverse impacts from our business activities and promote a positive attitude to the conservation and enhancement of all aspects of our environment. Environmental factors will be taken into consideration in our business planning and decision making.

In particular, Mid Group will achieve this through our commitment to:

- Employ systems and procedures that ensure the Company's compliance with all relevant environmental legislation, regulations and industry best practices;
- Identify its significant environmental aspects for all activities and put in place control mechanisms to mitigate their affects;
- Minimise the environmental impacts of its activities, prevent pollution and continually improve its environmental performance through setting objectives and targets and developing key performance indicators;
- Promote sustainable development by conserving energy, materials and resources, minimising consumption, maximising efficiency and effectively managing wastes; reducing waste levels and actively recycling waste materials for re-use;
- Promote design improvements to clients to enable the projects long term environmental impact to be minimised;
- Consider alternative installation methodologies to minimise the construction phase environmental impact of projects;
- Identify and manage key risks and have arrangements in place to respond to all foreseeable incidents and emergencies;
- Ensure that all activities are undertaken with minimal impact on local communities and not creating a nuisance to our neighbours;
- Involve Employees and Contractors in our environmental programs and provide training to enable them to discharge their responsibilities;
- Manage our supply chain to encourage their participation to minimise the use of materials, energy or processes which may be harmful to the environment;
- Include Environmental issues in an annual report which will review our performance and make recommendations for the future.

The participation and co-operation of all employees and contractors is vital to the success of this policy. This policy is available to all interested parties upon request.

**Signed:**



**Mr Steven Hearn**  
**CEO Mid Group**

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## **THE RESPONSIBILITIES OF THE CEO**

Mr Steven Hearn has overall responsibility for ensuring that all employees understand their role, accountability, and involvement in contributing to meeting the aims and objectives of the company's environmental policy.

Further responsibilities:

- To ensure that an environmental policy has been prepared and to update and review at regular intervals;
- To ensure that the organisations vision and direction in relation to environmental aspects is consistent with current socio-economic factors;
- To agree and endorse the environmental policy and corporate objectives of Mid Group;
- To develop policy commitments, review action plans and environmental targets;
- To ensure that the organisation complies with all statutory legal requirements;
- To monitor environmental performance, management systems and internal procedures;
- To develop targets for procurement and requirements of stakeholders, contractors and suppliers;
- To ensure regulatory compliance and continual improvement in all environmental aspects;
- To identify employee training needs and maintain an environmentally aware workforce.

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## **THE RESPONSIBILITIES OF THE HEALTH, SAFETY AND ENVIRONMENTAL CONSULTANTS**

- To provide professional advice and support to Mid Group on environmental issues, aspects and legislation;
- To develop, when requested, environmental procedures, programmes and achievable targets;
- To monitor environmental performance, management procedures and systems within the company;
- To review overall environmental performance, identify weaknesses and make appropriate recommendations to Mid Group;
- To inform Mid Group of any relevant changes to environmental legislation and industry guidance.

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## **THE RESPONSIBILITIES OF THE MANAGERS AND SUPERVISORS**

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement;
- To promote the company's environmental policy and general awareness of the adverse environmental impacts;
- To ensure Employees are informed and aware of any specific environmental aspects of their work activities;
- To ensure Employees undertake work processes in accordance with the company policy and any training received;
- Collect and submit to Mr Steven Hearn data and results of environmental performance.

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**THE RESPONSIBILITIES OF THE EMPLOYEES AND CONTRACTORS**

- To comply with all internal company procedures, work to achieve compliance with environmental legislation and to strive for continual improvement;
- To always promote the company's environmental policy and general awareness of the adverse environmental impacts;
- To ensure work processes are undertaken in accordance with the company's environmental policy and any training received;
- To inform the company of any areas of environmental management that may give rise to concern.
- To use any equipment in a manner that will eliminate or reduce the risk of pollution or contamination.
- To report any contamination you see or suspect is present so that action can be taken promptly.
- To recycle and give consideration to the environment when choosing and using materials.

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## ENVIRONMENTAL ARRANGEMENTS SECTION

### ENFORCEMENT

The Environment Agency encourages individuals and businesses to put the environment first and to combine good environmental practices with normal working methods.

The aim of enforcement is to make sure business and industry take appropriate action to protect the environment, make sure regulations which prevent pollution are complied with and secure better outcomes for the environment, people and business.

The Environment Agency may decide to enforce when any of the following occur:

- An incident;
- Breach of the conditions of a permitted activity;
- Non-compliance with legislation.

### Outcome-based approach

- The following enforcement options are available to be used to achieve environmental outcomes and more specifically to:
  - Stop offending;
  - Restore and/or remediate;
  - Bring under regulatory control;
  - Punish and/or deter.

### Enforcement powers

- The enforcement powers available include:
  - Enforcement notices and works notices (where contravention can be prevented or needs to be remedied);
  - Prohibition notices (where there is an imminent risk of serious environmental damage);
  - Suspension or revocation of environmental permits and licences;
  - Variation of permit conditions;
  - Injunctions;
  - Carrying out remedial works (where the Environment Agency carry out remedial works they will seek to recover the full costs incurred from those responsible);
  - Criminal sanctions, including prosecution;
  - Civil sanctions, including financial penalties.

### Civil Sanctions

Civil Sanctions provide The Environment Agency with new ways to protect the environment. They focus on investment in environmental clean-up rather than paying fines.

Civil sanctions do not replace any of the current enforcement tools. They provide a more flexible range so that the most appropriate enforcement action can be used when an offence occurs.

The Environment Agency will still prosecute serious offenders, but they will be able to use alternative sanctions with legitimate businesses who are trying to do the right thing. Offenders will be able to put right the damage they have done and local communities will see a direct improvement in the environment as a result.

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Unlike prosecution, civil sanctions are imposed or accepted by The Environment Agency. There are six types of civil sanctions:

- Compliance notice - a regulator's written notice requiring actions to comply with the law, or to return to compliance, within a specified period;
- Restoration notice - a regulator's written notice requiring steps to be taken, within a stated period, to restore harm caused by non-compliance, so far as possible;
- Fixed monetary penalty - a low-level fine, fixed by legislation, that the regulator may impose for a specified minor offence;
- Enforcement undertaking - an offer, formally accepted by the regulator, to take steps that would make amends for non-compliance and its effects;
- Variable monetary penalty - a proportionate monetary penalty, which the regulator may impose for a more serious offence;
- Stop notice - a written notice which requires an immediate stop to an activity that is causing serious harm or presents a significant risk of causing serious harm.

Civil sanctions are available for offences under the following regulations applicable to our undertakings:

- The Control of Pollution (Oil Storage) (England) Regulations 2001;
- Environment Act 1995;
- Hazardous Waste (England and Wales) (Amendment) Regulations 2016;
- The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009.

An organisation guilty of an offence under The Environment Protection Act 1990 or Environmental Permitting (England and Wales) Regulations 2010 shall be liable to a fine:

Maximum            When tried on indictment: unlimited fine  
                          When tried summarily: £50,000 fine

Offence range: £100 fine – £3 million fine

An individual guilty of an offence under The Environment Protection Act 1990 or Environmental Permitting (England and Wales) Regulations 2010 shall be liable to:

Maximum            When tried on indictment: unlimited fine and/or 5 years' custody  
                          When tried summarily: £50,000 fine and/or 6 months' custody

Offence range: conditional discharge – 3 years' custody



### AIMS AND OBJECTIVES

The aims and objectives of Mid Group are to ensure that the environmental aspects of the company's undertakings do not have any adverse environmental impact.

Where it is not possible to eliminate the impact, we will endeavour to reduce or minimise the environmental impact by the use of recycling, waste separation and other techniques.

Mid Group recognises that an essential management principle is that objectives and targets aim to be "S.M.A.R.T.E.R."

<b>Specific</b>	Objectives and targets should be clear in their intention and results. Specific responsibilities should be assigned to individuals.
<b>Measurable</b>	Performance indicators should be used to assess quantifiable results so that the degree of achievement or failure can be identified.
<b>Agreed</b>	All stakeholders and individuals involved or responsible for environmental aspects and achieving targets should have an opportunity to contribute and comment on it.
<b>Realistic</b>	Targets and objectives should be achievable in relation to resources available and other business priorities, but not too easily reached.
<b>Time-based</b>	Targets and objectives should be achieved in a given and known time frame. If the objective time period is many months or years, monitoring of progress should be undertaken.
<b>Evaluated</b>	and also ethical, enjoyable and engaging
<b>Re-evaluated</b>	the re-evaluation should be searching and be recorded

#### AIR

Mid Group will ensure through its maintenance and purchasing programme that mobile machinery used on its projects meets the emissions of gaseous and particulate pollutant levels outlined in various E.U. Directives and that continuous improvement is achieved.

Dust will be reduced as far as is practicable by the enclosure of working areas, preventing migration outside the working area. Where and if possible filtered extraction will be used to collect dust produced by static machinery.

#### ARCHAEOLOGY

In the event of any discovery of archaeological remains during the life of the contract, Mid Group will inform the Client or Principle Contractor.

Where it is known that the presence of archaeological remains may exist on site, Mid Group in accordance with the Client or Principle Contractor shall ensure all the correct permissions and consents are in place before allowing work to commence.

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**COMMUNICATION**

Effective two-way communication between employees at all levels is seen by Mid Group as an important part of ensuring the protection of the environment. Mid Group will work with all persons affected by their undertakings to ensure that information on environmental aspects and impacts are shared.

Communication with Employees will take various forms and Employees are reminded that they may raise any health or safety issue with any member of management in total confidence. Employees are actively encouraged to raise any concerns they may have in relation to environmental aspects.

**CONTAMINATION**

Where necessary, site investigations will be undertaken by the client prior to the commencement of works, with the results communicated to Mid Group for inclusion within the construction phase plan or by the Clients pre- construction information.

Should the details of a survey not be supplied and it is suspected that pollution is present at the commencement of works; the client will be contacted to arrange a decontamination operation or be asked to provide an adequate survey.

**DISPOSAL OF CONCRETE ON CONSTRUCTION SITES**

Where concrete or grout is used, it will be contained within a suitable barrier within the working area to prevent its escape and entering any watercourses or surface water drains. Concrete and grout products are highly alkaline and corrosive and can cause serious pollution and damage to the ground, watercourses, water wildlife, invertebrates and fish, as they are very sensitive to changes in pH levels. Concrete also contains chromium, which is potentially polluting not only to watercourses but also to groundwater.

Trucks, hoppers, mixers and concrete pumps that have contained concrete will be washed out in a contained area away from watercourses, surface water drains, storm water drains, grids and channels to prevent pollution. Where possible, store and reuse washoutwater.

**Pollution Prevention**

Concrete and cement mixing will be:

- Sited on an impermeable designated area;
- At least 10m away from a watercourse or surface water drain, to reduce the risk of run-off entering a watercourse;
- Surplus dry concrete, cement and grout will be used elsewhere on site if possible, or as inert rubble; if not, it will need to be disposed of off-site and transported using a registered waste carrier;
- Equipment, batching and ready mix lorry washing and cleaning will be washed out on site into a designated area that has been designed to contain wet concrete / wash waters;
- Wherever possible, excess concrete will be sent back to the batching plant;
- Wash waters will be stored to let them settle out and have re-circulation systems to reuse the water (e.g. for mixing and washing) to minimise the risk of pollution and reduce water use. Re-circulation systems include the use of sumps, specifically manufactured equipment, to a simple metal container. A lined and covered skip may be used for smaller sites providing it's in good condition

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(i.e. water tight) and solids frequently reused, recycled or removed and disposed of legally. (The site size and material amounts will determine facilities utilised).

Collect wash waters that cannot be reused to:

- Discharge to the foul sewer (permission will be gained from the local sewerage provider for this);
- Dispose off-site by a registered waste carrier;
- Reuse the solids that settle out during storage otherwise they will be disposed of legally.

### **Further Considerations**

All cement bags will be sealed after use, stored appropriately to prevent leaks or dust (preferably in a waterproof building or storage container) and disposed of legally off-site, never buried or burned.

The provision of a contained wash-off area for tools will be provided.

Consideration will be given to the types of cement, concrete and grout ordered - e.g. use quick setting products in structures in or near watercourses.

Limiting the amount of materials ordered and consideration to the timing of deliveries.

### **DRAINAGE**

Mid Group will undertake to eliminate risk to groundwater systems by identifying underground services before the commencement of a project, and marking all necessary plans and drawings to ensure that all relevant services are identified and marked prior to commencement of works.

We are aware that permission will be required from the local sewerage provider before discharging anything other than clean uncontaminated surface water to any drains.

Drainage will be identified by type, for example, surface water drains, soakaways, land drains foul water and combined sewers. Identification will also extend to protection measures, such as oil separators, interceptors and silt traps.

Drain covers will be marked to identify the type of effluent, for example, Blue for surface water, Red for foul water and Red C for combined foul water.

### **DUST**

Dust can come from a range of sources including brick and other material stockpiles, waste trucks and skips,

etc. Mid Group will take measures to reduce the risk of dust causing a nuisance to the local community by:

- maintaining a high standard of house-keeping on site;
- covering wagons and skips leaving site;
- where appropriate, ensure wheels are washed before trucks exit onto public roads;
- damping down stockpiles;

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- using vacuum systems or water to contain dust at source during cutting operations;
- using sheeting to screen and contain any dust within the curtilage;
- using local screen areas and water sprays to damp down dust at loading or material handling.

If the dust has the potential to contain hazardous substances such as silica (from some concrete aggregates) the protection of the employees must also be considered as well as the protection to the environment.

## **ECOLOGY**

Mid Group will comply with statutory requirements in respect of the preservation of nature conservation areas and protected species. Any disturbance to such areas or species will be minimised. All appropriate licences or consents will be obtained prior to commencing works.

## **ELECTRICAL AND ELECTRONIC EQUIPMENT**

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2015 (WEEE Regulations) introduced new responsibilities for businesses that use electrical and electronic equipment (EEE).

When disposing of any electrical waste Mid Group will comply with the requirements of our duty of care as detailed in the WEEE Regulations.

The duty of care has no time limit. Mid Group is specifically responsible for waste from production until we have transferred it to an authorised person.

As with the waste hierarchy, the primary objective of the WEEE Directive 28 is to prevent WEEE being produced in the first place. Where possible, measures should be taken to reduce the amount of WEEE produced. To this end Mid Group will choose electrical equipment which is proven to have greater longevity than comparable equipment, or replace parts or upgrade software of electrical equipment rather than discarding the whole appliance or unit.

## **ENERGY CONSERVATION**

Increasing energy costs, coupled with both National and Governmental needs for energy conservation, has resulted in "Energy Management" being regarded as an important task in all of the work activities undertaken by Mid Group.

Mid Group recognises that energy efficient measures can be achieved through the correct selection of appropriate plant and equipment.

Energy saving requirements may also involve such things as ensuring a piece of plant has completed all necessary tasks before being withdrawn from a project as its return to site at a later date will result in poor logistic management and added pollution.

All persons involved at the planning or tendering stage of projects will fully consider all possible areas of energy reduction and conservation.

## **ENERGY EFFICIENT DESIGN**

Mid Group are pleased to be able to advise all Clients and provide customers with the full technical assistance that they may require, in the achievement of reduced waste and efficiency, e.g. by advisory

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assistance when choosing suitable plant to undertake tasks and with the vast selection of efficiently designed and maintained plant and machinery. Mid Group firmly believes that by working with the client, we will be able to produce a tailor-made, energy efficient package suited to our clients' needs.

### **ENERGY PERFORMANCE**

In accordance with the requirements of The Building (Amendment) Regulations 2016 Mid Group will supply the client with an energy performance certificate. This is required where a building is erected or modified to a greater or lesser number of parts designed or altered for separate use than it previously had, where the modification includes the provision or extension of any of the fixed services for heating, hot water, air conditioning or mechanical ventilation.

### **ENVIRONMENTAL PROTESTORS**

At Mid Group we consider that, through the implementation of this policy document, we are doing our practicable utmost to protect the environment during all of our activities. However, should we ever experience the onset of environmental campaigners onto any one of our construction sites, we shall attempt to deal with them in the most respectful and considerate manner possible.

It is, of course, our primary interest to allow our employees and contractors to work without fear of verbal abuse and physical violence from individuals who may disagree with our construction methods, chosen locations or motives. It will therefore be the responsibility of our site management to contact the police immediately in the event of protestors congregating on, or around, any of our sites.

Our security measures shall always be of a sufficient extent to prevent the entrance of intruders onto our sites. Should an unauthorised persons happen to gain access to a construction site, there is a distinct possibility that they could be injured by a hazardous process or item of plant/equipment. It is therefore, in the interest of safety, (to both our employees and unauthorised persons), that intruders shall be prohibited from entering any of our sites where construction activities are taking place.

Should any environmental campaigners wish to peacefully scrutinise our methods of work, we shall be pleased to provide them with documented proof that our concerns lay very much within the preservation of our environment, as outlined in the contents of this policy.

### **ENVIRONMENTAL SUSTAINABILITY**

Mid Group has the responsibility for ensuring on-going environmental performance, identification of environmental risks, recording and monitoring of impacts and implementing environmental and social sustainability measures.

The key themes we aim to action are:

- Design for minimum waste;
- Minimise waste;
- Minimise energy in construction use;
- Do not pollute;
- Preserve and enhance biodiversity;

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- 
- Conserve water resources;
  - Respect people and local environment;
  - Monitor and report (i.e. use benchmarks).

Special consideration will be given to employing local contractors and wherever efficient and environmentally sustainable, materials products and services will be sourced locally.

We encourage employees and contractors to promote our commitment to environmental and social sustainability.

#### **LOCAL COMMUNITY ENGAGEMENT**

Mid Group accepts that, although the community may not have a direct relationship with our projects, it is nevertheless impacted by our construction activities and the resultant infrastructure.

If we should receive any complaints about our activities we would respond quickly and record any information so that we can improve our performance.

#### **LIGHTING**

Consideration to local residents and businesses will be given when positioning and directing lighting. Lighting shall be suitable and sufficient whilst preventing nuisance to local people, site vehicle operations, or other transportation.

#### **NOISE**

Mid Group will undertake to work within the parameters outlined by the client or the Local Authority to restrict noisy activities to the time periods requested. All controls will be applied including a rigid maintenance regime, sufficient damping, lagging and other acoustic controls to ensure the reduction of noise.

Mid Group will undertake to act proactively, to ensure the elimination of unnecessary noise and to reduce noise that is produced, to an acceptable level. Whenever possible noise will be reduced or eliminated by modifying machinery. We shall attempt to achieve this by maintaining equipment in good operation and encouraging our staff to report noisy equipment to our supervisors or managers when it requires attention.

Best Available Technique Not Entailing Excessive Cost (BATNEEC) will be used to prevent the effect of noise to the limit reasonably practicable having regard to the local conditions and circumstances, to the current state of technical knowledge and to the financial implications.

We shall attempt to achieve a reduction in noise from our vehicles by:

- turning off engines when they are not in use;
- checking the brakes are properly adjusted;
- not revving the engine unnecessarily;
- only using the horn in emergencies;

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- replacing exhaust systems as soon as they become noisy;
- replacing vehicles with electric or gas powered alternatives;
- maintaining vehicles in good operation;
- encouraging our staff to report unusually high levels of noise to our Supervisors.

We will ensure that noise does not cause a nuisance to the community surrounding the place of business or site on which we are working.

#### **OFFICE WASTE**

Through careful and efficient office management and the implementation of a quality system, the amount of waste created is kept to an absolute minimum. Mid Group is also promoting the recycling of office waste wherever possible.

This waste reduction is achieved through the use of recycled copy paper, envelopes, the keeping of “hard copies” of information to a minimum and using cups and cutlery etc. that are not of the disposable plastic type.

Employees are instructed to avoid printing documents where possible and to communicate via emails in the first instance rather than with letters.

The use of environmentally friendly cleaning agents is insisted upon when purchased and assurance gained to ensure they do not contain any illegal phosphates or Chlorofluorocarbon (CFC) propellants.

Electrical energy is conserved by the use of high efficiency, fluorescent lighting which is switched off in rooms which are not in use. Natural energy used in heating systems is conserved by regular maintenance, servicing and individual thermostatic controls.

#### **POLLUTION**

The Employees of Mid Group are aware of the importance to protect the integrity of groundwater, rivers, lakes, ground and air, and other elements of the eco system. The company recognises duties under the Control of Pollution (Oil Storage) (England) Regulations 2001, The Groundwater (England and Wales) Regulations 2009, Anti-Pollution Works Regulations 1999 and The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009.

Pollution processes, for example releasing any substances that can harm people or animals, plants, soil, water or air; for example, an oil spill, silty water getting into a river or smoke into the air, are prevented by on-going training and awareness of Employees.

Employees of Mid Group are made aware of the common causes of pollution, such as illegal discharges; burning of waste; pollutants carried by rain water run-off; poor maintenance regimes and accidental spillages or vandalism, and are actively encouraged to report and pro-actively deal with pollution situations as soon as practical.

Mid Group recognise they have responsibility for preventing pollution on site, and have engaged a ‘responsible person’ to manage activities and risks including deliveries, oil and chemical storage and placement and maintenance of plant.

Mid Group recognise that efficient monitoring of pollution will serve to enhance the company’s reputation,

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reduce nuisance to our neighbours, save us time and delays, avoid fines, help to win future work and protect the environment.

### **PREVENTING FLY TIPPING OF WASTE**

Mid Group is committed to dealing with improving local environmental quality and tackling waste crime, such as "fly-tipping". We acknowledge that the illegal disposal of waste is an anti-social behaviour that is adversely affecting the amenity of our local environments and reducing civic pride.

Fly-tipping can lead to serious pollution of the environment and harm to human health. It can cost innocent victims of fly-tipping and public bodies such as local authorities and the Environment Agency large amounts of money to remove the waste.

To prevent fly tipping, producers of waste must ensure that it remains under their control until correctly disposed of. Mid Group arrange for the removal of waste by a registered waste carrier to a licensed landfill site, in accordance with the Duty of Care provisions of the Environmental Protection Act 1990.

A Waste Transfer Note (WTN) must be created for each load of waste that leaves our sites. The WTN will contain enough information about the waste to enable anyone coming into contact with it to handle it safely and either dispose of it or allow it to be recovered whilst maintaining compliance with the law.

We shall describe on the WTN, both in words and by reference to the appropriate codes in the European Waste Catalogue (EWC), the quantity and types of each different waste being transferred.

The WTN will also include details of how the waste is contained (i.e. loose or packaged and, if packaged, then in what type of containers). Mid Group shall never rely on waste carriers or waste management contractors to describe our waste for us on WTN's. We, as the producer, are in the best position to accurately describe our waste.

Mid Group will keep copies of all WTN's for at least two years. Whatever the destination of our business wastes and whichever organisations are handling them, it will help us to prove that we have properly discharged our Duty of Care by undertaking periodic audits. This will enable us to ensure that our wastes are being handled correctly from the moment they leave our premises to the final point of disposal or recovery.

### **PREVENTING FUEL ENTERING ADJACENT WATERCOURSES AND DRAINAGE SYSTEMS**

The risk of spillage is at its greatest during refuelling of plant. Mid Group will adopt the following precautions to prevent fuel spillage entering watercourses:

- Where possible, we shall refuel mobile plant in a designated area, preferably on an impermeable surface and away from any drains or watercourses;
- Keep a spill kit available;
- Never leave a vehicle unattended during refuelling, or allow our staff to jam open a delivery valve;
- Check hoses and valves regularly for signs of wear, and ensure that they are turned off and securely locked when not in use.
- Diesel pumps and similar equipment shall be placed on drip trays to collect minor spillages. These will be checked regularly and any accumulated oil will be removed for disposal.

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- In the event of a spillage on site, the material shall be contained (using an absorbent material such as sand or soil or commercially available booms), and the Environment Agency will be notified immediately.

#### **PREVENTION OF POLLUTION FROM PLANT AND MACHINERY**

In order to prevent materials leaking from static plant, such as company vans, contaminating the ground and being washed into the drainage system, Mid Group shall place static plant on drip trays or bunded areas.

Facilities for washing plant and equipment contaminated with concrete or other chemicals will be provided. Washwater from the facilities will be managed to prevent pollution of surface water and groundwater.

Construction site runoff from plant and machinery can cause serious pollution if appropriate management systems for controlling discharges are not adequately followed.

In our efforts to reduce our carbon footprint when replacing plant, we will gradually introduce 'green plant' when they become available for purchase or hire. We will also encourage our employees to use public transport, cycle to work and share cars wherever possible.

#### **PROCUREMENT**

Mid Group will promote goods and services that are environmentally friendly as against those that are less so. Such decisions made can be significant both in expenditure and scale. The effect on suppliers and the environment should be viewed in this light. A key way to influence suppliers is through the specification, in addition to environmental factors, procurement decisions should also always take into account both value for money and fitness for purpose.

The following instances illustrate areas where procurement decisions have been made in favour of environmentally friendly goods and services:

- Purchasing goods, plant and materials, which can be manufactured, used and disposed of in an environmentally responsible way;
- Office cleaning; environmentally friendly cleaning materials have been specified in all cleaning contracts in recent years,
- Specifying and purchasing of plant and items which will, in the first instance, have a long working life and can be recycled when the service life has ended;
- Specifying and purchasing items which can be operated in an energy efficient manner;
- Specifying and purchasing items that are of the best quality, have replacement parts and are not part of the "throw away" culture;
- Selecting suppliers and contractors who are themselves undertaking measures to make environmental improvements;
- Purchasing equipment with due consideration of noise, emissions and vibration produced;
- The negotiation of favourable rates from water, gas and electrical service providers.

#### **PROTECTION STRATEGY FOR WILDLIFE, TREES, WATERCOURSES AND LANDSCAPE FEATURES**

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It is important to Mid Group as a company to minimise the impact of their projects on local wildlife.

Mid Group will undertake an environmental appraisal, which properly accounts for biodiversity, as an element of all of our development proposals; regardless of the statutory necessity to do so.

Our key considerations and actions include:

- To use materials with similar PH values so as not to adversely affect adjoining habitats by 'leaching';
- To try to source our materials locally, especially if they help to support the ecology and habitats of the region. This will also reduce our travel whilst supporting the local economy.

Mid Group will conduct our activities and operations to reflect best environmental practice and implement an environmental management system to pursue sustainability, continual improvement and the prevention of pollution.

In particular, we will:

- Comply with all applicable legal and other requirements;
- Identify environmental aspects and prioritise action to reduce them;
- Set challenging targets to reduce our environmental impacts and regularly review progress;
- Raise awareness of the environment amongst our employees through training, our environmental co-ordinators network and communication of environmental performance;
- Report annually on our progress and performance, making this available both within the Office and externally;
- Undertake regular management reviews to ensure that our environmental management system remains effective.

All of our construction activities shall be completed in accordance with the requirements of The Conservation of Habitats and Species (Amendment) Regulations 2012, Natural Environment and Rural Communities Act 2006 and The Wildlife and Countryside (Amendment) Act 1991.

## **RECYCLING**

Mid Group, as a company, is committed to minimising all waste in its operations and works. Where waste may be produced, every effort will be made to recycle such materials, i.e. metals, etc.

Mid Group will make full use of any recycling facilities provided by the Supplier, Manufacturer, Principal Contractor or Local Authority.

## **REDUCTION OF EMISSIONS FROM BUILDINGS**

A number of gases have been identified over the last few years as detrimental to the environment. These include greenhouse gases, such as carbon monoxide, carbon dioxide, and nitrous oxide. Each of these can be by-products from heating boilers; chlorofluorocarbons (CFCs), which can be a by-product from chillers and air conditioning units.

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Mid Group will aim to reduce the emission of such gases from its buildings. The scope for doing so will vary, depending on the extent of responsibility or influence over a building's management. Mid Group will however always take the opportunity to lower emissions from buildings and will also provide advice in so far as our expertise allows to us enable clients to reduce emissions in their buildings. Proper maintenance regimes for equipment such as boilers and chillers will reduce the likelihood of leaks from such equipment and lower them as far as is practical.

Buildings that use air conditioning can consume substantially more energy than those that are either naturally or mechanically ventilated. The general preference should therefore be for one of the latter options. Measures that reduce thermal gain e.g. blinds and window coverings also reduce the requirement for air conditioning. The settings at which building plant e.g. for heating, air conditioning operates will also be subject to periodic review.

### **REMOVAL OF TREES WITH PRESERVATION ORDER**

With certain exceptions, it is illegal to fell trees in Great Britain without prior Forestry Commission (FC) approval. All cases of suspected illegal felling are investigated, and prosecution may ensue. FC and The Department of Agriculture and Rural Development (DARD) Forest Service policy is that areas felled will be replanted or naturally regenerated, except where felling is allowed for environmental improvement or to enable development authorised under planning regulations.

A Tree Preservation Order (TPO) is made by the Local Planning Authority (LPA) usually a local council to protect specific trees and woodland from deliberate damage and destruction. TPO's prevent the felling, topping, lopping or uprooting of trees without permission from the planning authority.

Mid Group accepts that, if we should deliberately destroy a tree, or damage it in a manner likely to destroy it; we could be fined up to £20,000 if convicted in the magistrate's court. We are also aware that we will normally have to plant a replacement tree if the tree was cut down or destroyed.

Mid Group shall seek permission from the Forestry Commission to fell any growing trees that may be present on any of our sites. We shall not begin felling until we have been issued with a licence or received other permission from the Forestry Commission.

An application form will be obtained from the appropriate Forestry Commission office. It shall be completed and submitted for approval, along with two signed copies of a map of the area showing the location of the trees that we wish to fell. It is estimated that a licence shall be issued within 10 weeks from the receipt of application.

If we are unsure as to whether or not a tree is covered by a protection order we shall visit the local planning authority's offices to inspect the details of TPOs in operation within the surrounding area.

### **SITE DRAINAGE PLANS**

This shall be a clear diagram of the site showing layout and access details, along with a schematic representation of the site drainage arrangements.

- Use red to mark for foul drainage on the plan and blue for surface water drainage. Indicate the direction of flow clearly.
- Use a similar approach for drain covers on-site. These can also be numbered to assist identification and painted red for foul sewers or blue for surface water; mark a red 'C' on combined sewage systems.
- Mark off-site discharge points for surface water and trade effluent clearly. Location of any soak ways

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marked.

- Identify the sewage treatment works to which sewage and trade effluent discharge; along with the nearest foul sewer pumping station serving the site (the local sewer provider should have this information).
- Show any watercourse, spring, and borehole or well located within or near the site.
- Indicate the direction of flow (or depth for boreholes and wells), surface water outfalls from the site and suitable points for installing pollution control booms or a dam.
- If possible, install permanent boom anchor points at a suitable location, taking into account possible flow conditions.

**A site drainage plan shall show/identify the following:**

- General layout of the buildings.
- Site access routes for emergency services (marked clearly).
- Location of process areas and any on-site treatment facilities for trade effluent or domestic sewage.
- Areas or facilities used for storage of raw materials, products and wastes (include details of tank sizes).
- Any bunded areas together with details of products stored and estimated retention capacity.
- Any potentially sensitive areas of porous or unmade ground.
- Location, depth and construction details of any soak ways receiving surface water discharges.
- Location of the mains water supply stopcock and any sprinkler control valves.
- Location of hydrants, 'fireboxes' and pollution prevention materials (e.g. spill kits).

Facilities such as:

- Inspection points for the detection of pollution.
- Oil separators.
- Retention or balancing tanks.
- Fire water retention ponds.
- Containment tanks and pollution control devices (e.g. shut-off valves in drains).
- Sites suitable for portable storage tanks or for blocking drains.

Provide a brief description of how they operate and ensure such facilities are clearly labelled 'aboveground'. In many cases, additional plans will be required to provide detailed information. These should be attached to the plan and referenced within it.

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## SITE WASTE MANAGEMENT PLANS

Mid Group believes that sustainable waste management is achievable by committing ourselves to a waste strategy that is based on the following waste hierarchy:

- ✓ **Reduce** – We shall endeavour to only order the amount of materials that we actually need.
- ✓ **Re-use** – We shall endeavour to choose materials that can be broken down in component parts at the end of their life and re-used.
- ✓ **Recovery** – This includes recycling, composting and waste-to-energy.

Materials will be separated into component parts, ready for re-use.

There is no longer a legal requirement to produce a Site Waste Management Plan (SWMP) however, Mid Group will work with the Client and advise the use of a SWMP as good practice as Mid Group recognise the advantages to be gained in the following areas;

- Purchasing strategies or methods of work resulting in reducing waste;
- The on-site re-use or recycling of site-gained materials;
- The responsible disposal of waste;
- Giving records on waste types and amounts to the Principal Contractor in order that they can reduce waste in the future;

What information will the SWMP contain?

- Types of waste removed from the site;
- Volumes of the above waste;
- Identity of the organisations that removed the waste and their waste carrier registration number;
- Site that the waste was taken to;

At the end of the project, we will review the plan and record the reasons for any differences between the plan and what actually happened.

## STORAGE AND USE OF CHEMICALS, FUEL OIL AND OTHER CONSTRUCTION MATERIAL

We will attempt to reduce or eliminate the use of ozone depleting chemicals (CFC, Halon, 1.1.1 Trichloroethane, HCFC).

Chemicals will be stored in secure designated, (bunded where necessary) storage areas and in accordance with the appropriate regulatory requirements, including the Control of Substances Hazardous to Health (Amendment) Regulations 2004 and The Control of Pollution (Oil Storage) (England) Regulations 2001. Refuelling of vehicles and machinery will be undertaken in accordance with a specified procedure that may include the designation of refuelling areas. Spill contingency plans will be drawn up and included in the procedures. Stockpiles of dry materials will be stored in locations that prevent contamination of surface waters.

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In the construction industry one of the major routes of pollution is due to the leakage of oils and fuels onto the ground. Mid Group are aware of this problem and their statutory duties in accordance with The Control of Pollution (Oil Storage) (England) Regulations 2001. Mid Group will ensure that all oil will be stored in a container which is of sufficient strength and integrity to ensure that it is unlikely to burst or leak while used on site and that tanks have a secondary containment system not less than 110% of the containers storage capacity.

All tanks and mobile bowers will be positioned or other steps taken so as to minimise any risk of damage by impact and drip trays used where the fill pipe is not positioned within the secondary containment system or "bund". All filling devices will have a tap or valve which closes automatically when the filling tap or gun is not in use and will have a lockable valve which will remain locked shut when not in use in the prevention of oil spills as a result of vandalism.

There will be strict guidelines for the filling of machinery tanks and a formal procedure for the clearing of any spills and subsequent disposal.

Oil shall be stored in a container which is of sufficient strength and structural integrity to ensure that it is unlikely to burst or leak in its ordinary use. The container shall be sustained within a secondary confinement system which satisfies the following requirements:

- It will have a capacity 110% of the container's storage capacity or, if there is more than one container within the system, of not less than 110% of the largest container's storage capacity or 25% of their aggregate storage capacity, whichever is the greater.
- It will be positioned so as to minimise any risk of damage by impact, so far as is reasonably practicable.
- Its base and walls shall be impermeable to water and oil.
- Its base and walls shall not be penetrated by any valve, pipe or other opening which is used for draining the system.
- If any fill pipe, or draw off pipe penetrates its base or any of its walls, the junction of the pipe with the base or walls shall be adequately sealed to prevent oil escaping from the system.

## **WASTE**

Mid Group recognises its Duty of Care under The Waste (England and Wales) Regulations 2014 and other associated statutory provisions. The regulations require that those companies who carry their own waste on a 'normal and regular' basis are to be registered. The regulations set two tiers of registration and as a construction company transporting construction waste Mid Group have registered as an upper tier carrier and have paid the required fee to appear on the Environmental Agency Public Register. We recognise that registering as a waste carrier also helps the Environmental Agency to clamp down on fly-tipping by illegal operators who harm human health and the environment whilst also undercutting legitimate businesses.

The duty of care with regards to waste aims to protect the environment and human health by making sure that waste is handled safely and only passed to companies authorised to receive it. When Mid Group passes on its waste to another carrier we will ensure good practice is followed i.e.:

- We will check that the company or person we are transferring the waste to is properly authorised to accept it. E.g. we will check they are a registered waste carrier
- We will ensure the waste is safely contained and is not able to escape control.

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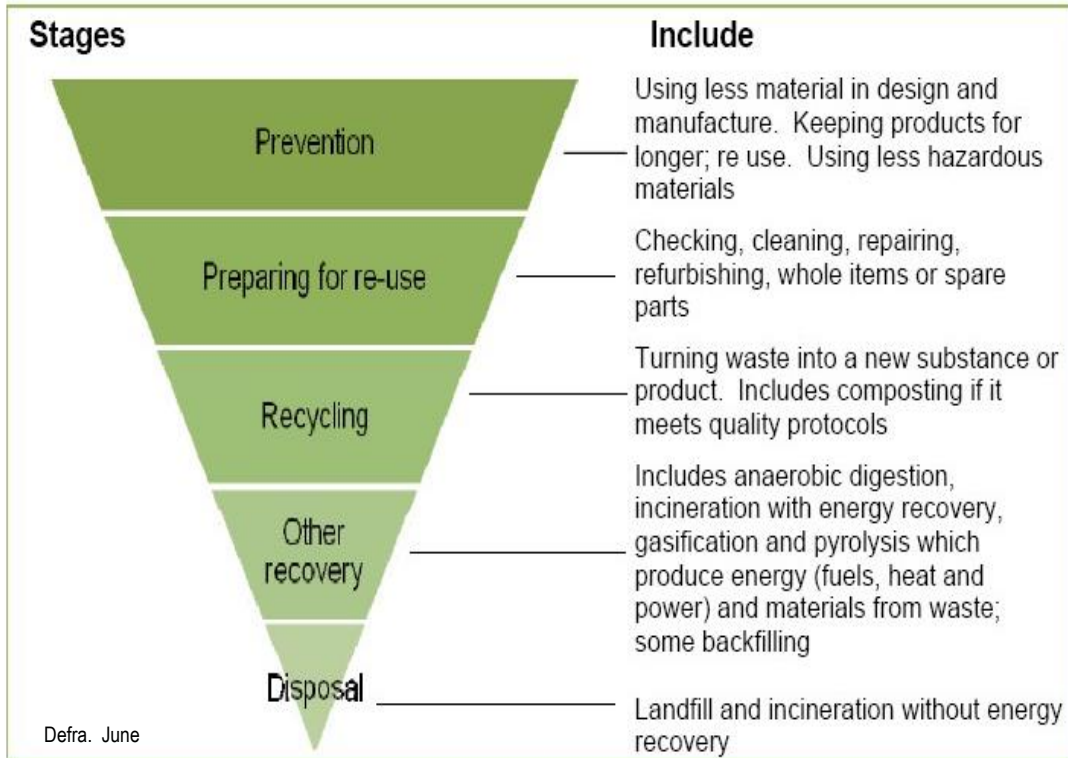
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- We will ensure the correct documentation is completed for each transfer of waste and that it correctly describes the waste;
- We will minimise the environmental impact of waste by prioritising waste prevention, re-use, recycling and recovery over disposal. This is known as applying the ‘waste hierarchy’.

Mid Group will take all such measures as are reasonable in the circumstances to apply The Waste Hierarchy approach to prevent waste, and to apply the hierarchy as a priority order when transferring waste to another person, as outlined below.



Mid Group aims to minimise any adverse impact on the environment from its policies and working practices. To that end we will plan to reduce the amount of waste we generate and pursue methods of disposal in line with this objective. These will include recycling, in contrast for example to collection and incineration.

### Hazardous waste

Hazardous waste is defined by the List of Wastes/European Waste Catalogue where wastes considered to be hazardous are marked with an asterisk. It includes things that you would naturally expect to be hazardous – such as certain sludge’s or chemical waste from refining processes but it also includes waste that arises in everyday business activity including construction and demolition. These include:

- Fluorescent tubes (see EA Guidance Note);
- Cathode ray tube televisions and monitors;
- LCD screens and laptops;
- CFC containing fridges and freezers;
- Certain types of batteries;
- Mineral oil or oil soaked rags and cleaners.

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Business producing this type of waste cannot put it in the general waste bin and must have it separately collected under Hazardous Waste consignment procedures. Mid Group note that if they have a site that generates >500kgs of hazardous waste per year, they will register as a hazardous waste producer to get a premises code for use on consignment notes.

### **SUPPLY CHAIN**

We will endeavour to use suppliers who are willing to take away packaging for re-use or recycling and will consider the environmental impact of any purchases.

We will endeavour to only use sub-contractors and suppliers who comply with our environmental policy and who assist us in our goals to fulfil our Environmental objectives.

### **TIMBER PROCUREMENT**

Mid Group will only source virgin timber and timber-derived products from legal and sustainable sources which are credibly certified by a third party and hold full chain of custody. This requirement will apply to all timber products used by Mid Group, including products supplied by contractors. This will guarantee that the timber sourced comes from forests which meet essential principles and will:

- Comply with all relevant national and international legislation relating to the trade in forest products;
- Conserve biological diversity;
- Avoid the use of highly hazardous pesticides.

Mid Group will follow the recommendation to use timber products certified by the Forest Stewardship Council (FSC); unless it contradicts other Mid Group's sustainability objectives like minimising transport emissions and favouring local sourcing. Mid Group will do the following:

- Communicate clearly the requirements to all the supply chain as part of its procurement process and contracts;
- Work closely with its supply chain;
- Provide adequate training to our employees;
- Devise adequate monitoring and audit mechanisms to demonstrate compliance; and
- Report on its performance and review its progress on an annual basis to ensure continuous improvement.

### **VEHICLES**

Vehicles within the control of Mid Group will be serviced regularly to reduce noise and breakdown costs.

Vehicle reversing alarms will be minimised where possible by setting up a one-way driving system and fitting broadband reversing alarms as this can reduce the level of noise that is generated on site.

Vehicle noise will be reduced in our operations by:

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- turning off engines when they are not in use;
- checking the brakes are properly adjusted and don't squeal;
- not revving the engine unnecessarily;
- only using the horn in emergencies;
- replacing exhaust systems as soon as they become noisy;
- replacing vehicles with electric or gas powered alternatives.

## **TRAINING**

All employees will be given training in general environmental awareness, task specific procedures and methods that can be used to reduce or minimise the impact to the environment by the undertakings of the company.

The Sustainability and Transformation Director will assist Mr Steve Hearn in identifying training needs throughout the company, preparing appropriate training programmes and delivering those programmes to employees.

## **WATER**

The Employees of Mid Group are aware of the importance to protect the integrity of groundwater, rivers, lakes and other elements of the water system. The company recognises duties under the Control of Pollution (Oil Storage) (England) Regulations 2001, The Groundwater (England and Wales) Regulations 2009, Anti-Pollution Works Regulations 1999 and The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009.

In particular Section 85 of The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009 which states that, 'no person shall cause or knowingly permit any poisonous, noxious or toxic material or solid waste to enter a 'controlled water'. 'Causing' means not only deliberately releasing any polluting matter but also causing the pollution accidentally, by being the operator of a plant or process.

Where necessary to prevent water pollution, drain covers, self-contained water systems and other methods will be used. Detergents and solvents are to be as environmentally friendly as possible and where not possible Mid Group will ensure that the migration of substances does not adversely impact on the environment.

With regards to domestic water usage measures such as 'Hippo' bags in toilet cisterns will be exploited to reduce the volume of water used per flush, flush controllers on urinals will control the frequency and timing of flushes and when Mid Group are in a position to make recommendations these can incorporate infrared presence detectors, so that urinals are not flushed when a building is not occupied, e.g. at weekends. Measures to reduce the flow rate of taps will also be considered e.g. by using spray fittings rather than normal taps or by using flow restrictors.

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## MONITORING OF THE POLICY

Employees are encouraged to bring to the attention of the Director, areas, which in their opinion this policy appears inadequate. This Policy and Arrangements will be reviewed on at least an annual basis, provision will also be made to undertake a review in the event of the introduction of new, or the amendment of existing legislation, codes of practice or guidance notes.

**Signed:**

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Steven Hearn  
**CEO of Mid Group**

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## MONITORING AND REVIEW

We will establish appropriate information and monitoring systems to assist the effective implementation of our Environmental Policy. The effectiveness of the Environmental Policy will be reviewed regularly (at least annually) and action taken as necessary.

<b>DATE OF REVIEW</b>	<b>REVIEWED BY</b>	<b>BRIEF DESCRIPTION OF CHANGES</b>	<b>REVIEW DATE</b>
January 2017	M.E.L. (Health & Safety) Consultants Ltd	Policy Creation and implementation	January 2018
February 2018	M.E.L. (Health & Safety) Consultants Ltd	Policy reviewed in line with current legislation, no changes made	February 2019
February 2019	Steven Hearn	Policy reviewed in line with current legislation	February 2020
October 2020	Cliff Jones / Steven Hearn	Formatting review, new CEO appointment and reviewed in line with current legislation	October 2021
November 2021	Cliff Jones / Steven Hearn	Formatting Update and reviewed in line with current legislation	November 2022

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