

Attachment J. Accident Prevention and Emergency Response

Greenstar has prepared a Group Health & Safety Statement for all waste facilities that requires the completion of hazard identification and risk assessments to minimise the occurrence to accidents. It includes for staff training on actions to be taken in abnormal conditions. A copy of the procedure is in this Attachment.

Greenstar has prepared and adopted a Group Emergency Preparedness and Response Procedure, a copy of which is in this Attachment. The procedure identifies the management responsibilities.

Greenstar has also prepared a site specific Emergency Response Procedure (ERP) that identifies all potential hazards at the site that may cause damage to the environment and also specifies roles, responsibilities and actions required to deal quickly and efficiently with all foreseeable major incidents and to minimise environmental impacts. A copy of the procedure is in this Attachment. This EPR is currently being revised and updated to take into incorporate additional fire prevention measures and personnel changes.

Greenstar has prepared a draft procedure on Fire Prevention and when this has been completed it will be applied at all of its facilities, including Dock Road as referred to above. A copy of the draft procedure, which addresses materials storage and ignition sources, is in this Attachment.

Waste Facilities Health & Safety Statement



greenstar

setting the standard

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1.0 INTRODUCTION

1.1 *General*

This document is the Greenstar programme, in writing, for safeguarding Safety, Health and Welfare in the workplace.

It represents a commitment by Greenstar to safeguard the Safety, Health and Welfare of our employees and anyone effected by our activities and specify the manner, the organisation and the resources necessary for maintaining and reviewing Safety, Health and Welfare at work.

This Statement has been prepared in compliance with Section 20 of the Safety, Health and Welfare at Work Act, 2005.

It is emphasised that responsibility for Safety, Health and Welfare at Work flows from the highest level of Management through the General Manager, the Site Operations Managers, Department Managers and the Supervisors to Operators and Support Personnel, Contractors and Visitors, who also bear responsibility for their own Safety, Health and Welfare at Work.

Management will periodically review this Safety Statement in order to monitor achievement of the overall objective “An Incident and Injury Free Environment for all Employees, Contractors, Visitors and any person impacted by our operations”.

1.2 *Scope*

This Safety Statement has been prepared specifically for Greenstar Waste Facilities and includes the following:

- ⇒ How the site-specific hazards present in the workplace are identified,
- ⇒ How an assessment of the risks arising from these hazards is carried out,
- ⇒ How Safety, Health and Welfare in the workplace is to be ensured by deciding on any control measures,
- ⇒ The names and job titles of persons responsible for Safety and Health,
- ⇒ General Duties of Employer and Employee,
- ⇒ Details of the arrangements made and resources provided for securing Safety Health and Welfare,
- ⇒ Details of the co-operation required from employees in Safety and Health matters,
- ⇒ The arrangements made for consultation with employees on Safety and Health matters,
- ⇒ Details in relation to Stress, Harassment and Bullying,
- ⇒ Details in relation to Pregnant Employees,
- ⇒ Details of Health and Safety information and training available to employees,
- ⇒ Information on Welfare Facilities available.



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2.0 DECLARATION OF EHS POLICY

Environment, Health & Safety Policy

Greenstar is Ireland's leading provider of integrated and sustainable waste management solutions, at each level of the waste management hierarchy. Our business spans a range of services that includes education, research, composting, recycling and the development of facilities for the safe disposal of residual waste.

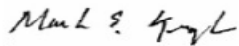
Greenstar regards environmental protection and health and safety management as integral and essential parts of good business practice. We are committed to the prevention of injury and ill health and the provision of a safe and healthy working environment for all of our employees and persons working on behalf of the company and to achieving and maintaining a high standard of environmental quality in all our operations. We also fulfil our duties to our neighbours, customers and to the wider community in terms of health & safety and environmental matters.

Greenstar is committed to providing the necessary information, training and equipment to enable our employees to carry out their duties safely and in an environmentally responsible manner. All staff and persons working for and/or on behalf of Greenstar shall be made aware of the Environment, Health & Safety Policy.

We have implemented systems in accordance with the ISO 14001:2004 and the OHSAS 18001:2007 standards and aim to achieve the following objectives:

- ❖ Promotion of health & safety and environmental awareness among all our employees and the generation of an ethos of continual improvement within the company.
- ❖ Diligent management of operations by employing control mechanisms, procedures and processes that are technologically proven and economically feasible.
- ❖ Reduction of waste and implementation of the most feasible environmental options for disposal of unrecoverable materials, promotion of the use of recycled materials and sourcing of sustainable markets for recovered materials.
- ❖ Promotion of continual improvement, pollution prevention and good health & safety work practices through continual review of objectives and targets.
- ❖ Fostering of openness, dialogue, enhanced communication and discussion with employees, clients, neighbours, suppliers, contractors and all interested parties regarding our health & safety and environmental performance and our objectives and targets.
- ❖ Publication and communication of our Policy internally and ensuring its availability to the public and interested parties on request so that it is understood, implemented and maintained.
- ❖ Measurement of performance by conducting regular audits and assessment of compliance with the ISO 14001:2004 and the OHSAS 18001:2007 standards, EHS Policy, relevant legislation and regulatory requirements.

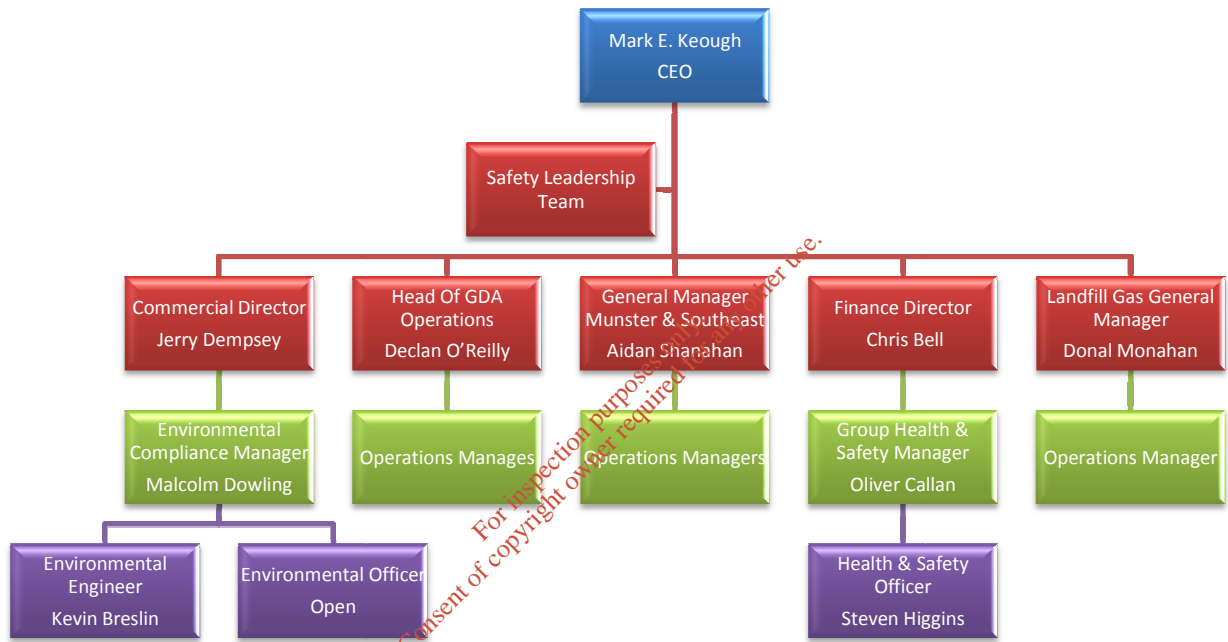
Greenstar understands its legal obligations and is committed to complying with current health & safety and environmental legislation, regulatory requirements, corporate guidelines and codes of practice. We recognise the paramount importance of safeguarding health & safety and protecting the environment and acknowledge that legislative compliance is the minimum standard acceptable. We will review our legislative responsibilities and this policy on an ongoing basis and provide self-monitoring to ensure compliance.

Signed 
Mark E. Keough
Chief Executive Officer

Date: 4th March 2014

3.0 RESPONSIBILITIES

3.1 Safety Management Organogram



* SLT:Head of GDA Operations, General Manager Munster & Southeast, Commercial Director, Finance Director, Group Health & Safety Manager.

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3.2 **CEO, Mark Keough**

Responsibilities: The **CEO** has overall responsibility for:

1. Ensuring the provision of a safe and healthy working environment for all Greenstar employees, contractors and visitors or other persons impacted by our operations,
2. Establishing and maintaining an effective Health & Safety Policy and ensuring that:
 - ⇒ The Policy is established and is current.
 - ⇒ The Policy is understood at all levels.
3. Overseeing that management systems are operating correctly to safeguard the safety, health and welfare of all employees, contractors and visitors and anyone impacted by our actions on or off site,
4. Ensuring that the company complies with applicable legislative requirements,
5. Ensuring that appropriate staff and resources are made available to meet the requirements of all applicable health, safety and environmental legal and regulatory requirements Guidelines, and procedures,
6. Ensuring that responsibility for safety, health and welfare is assigned and accepted at all levels within the company,
7. Ensuring that all direct staff under the CEO's control is held accountable for their performance in relation to occupational health and safety, and that this measurable performance is evaluated at the time of their annual review,
8. Ensuring that only the highest standard of safety is acceptable by role modelling commitment to safety,
9. Setting Annual Health and Safety performance objectives with all Departments.

3.3 **Directors & Heads of Departments**

Responsibilities: **Directors and Heads of Departments** are responsible for ensuring that:

1. Procedures are established to ensure that management systems are operated within their areas to ensure the safety, health and welfare of all individuals and that the company complies with applicable legal and regulatory requirements,
2. The appropriate staff and resources are made available to meet the requirements of all applicable safety legislation and Greenstar Group environmental, health and safety guidelines and directives,
3. The responsibility for safety, health and welfare is assigned and accepted at all levels,
4. All direct staff under an individual Directors or Head of Departments control are held accountable for their performance in relation to occupational health and safety, and that this measurable performance is evaluated at the time of their annual review,
5. Only the highest standard of safety is acceptable by role modelling commitment to safety,
6. Setting annual Health and Safety performance objectives with their Department.



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3.4 Group Health and Safety Manager

Responsibilities: The Group Health and Safety Manager is responsible for the creation, design, development and co-ordination of all Health and Safety programmes within Greenstar. In particular, the Group Health & Safety Manager is responsible for:

1. Managing Safety, Environment, Industrial Hygiene, Ergonomic and Occupational Health programmes to ensure a safe and healthy working environment for employees and community alike,
2. Working with site management on strategies for the implementation and revision of all programmes under his control,
3. Advising the company on all regulatory requirements relating to safety, health and welfare,
4. Ensuring that risks are assessed and that appropriate control measures are adopted,
5. Developing safe practices, procedures and safe systems of work in conjunction with relevant sites, to help ensuring the health, safety and welfare of all employees on site,
6. Working directly with, when required, the officers of the National Authority for Occupational Safety and Health,
7. Establishing site safety committees and other safety teams as required,
8. Creation and communication of safety, health and welfare reports, to appropriate personnel within Greenstar, and to outside regulatory agencies,
9. Maintaining detailed safety, health and welfare records in accordance with regulatory requirements as applicable,
10. Fully investigating all significant accidents, incidents and dangerous occurrences and reporting on them to the Health and Safety Authority as required,
11. Ensuring that occupational safety and health inspections or audits are conducted and that all departments are complying with the terms of the Safety Statement and the maintenance of records.,
12. Working with site Emergency Response Team Coordinators / Fire Marshals, on evacuation procedures, fire fighting, fire drills, fire exits and compliance with fire safety regulations,
13. Overseeing that fire and emergency response drills are carried out on a regular basis to ensure a high level of familiarity with procedures,
14. Developing and updating the company Safety Statement on an annual basis, or more frequently, if circumstances dictate,
15. Issuing guidelines for the development of safety training programmes to ensure that such programmes are implemented,
16. Overseeing that all new facilities incorporated, plant, processes or machinery brought onto any Greenstar site conforms to the current regulatory provisions governing health and safety within Ireland.

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3.5 General Managers & Site Operations Managers

Each General Manager & Site Operations Manager is responsible for ensuring that all employees under their control, and others such as contractors and visitors, are made aware of and agree to fully comply with the requirements of the Greenstar Safety Statement

In particular, each General Manager & Site Operations Manager is responsible for:

1. Ensuring that all employees under their control receive adequate safety training and instruction appropriate to the tasks they perform,
2. Ensuring that all staff temporary and full time have received induction training and are competent and training in the activity they are requested to carry out,
3. Role modelling, through personal behaviour, that only the highest standards of safety is acceptable,
4. Ensuring that systems, supporting safety and health programmes, are functional in the department to enhance protection of personnel from risks whilst carrying out their duties,
5. The understanding and implementation of the company's Safety Statement in accordance with the provisions of the Safety, Health and Welfare at Work Act 2005 and Greenstar Health and Safety Policy,
6. Investigating all accidents, incidents and dangerous occurrences, in their area of control, and reporting on them in accordance with company procedures,
7. Carrying out and documenting EHS inspections in their area of responsibility,
8. Ensuring that all staff under their control are held accountable for their performance in relation to occupational health and safety, and that this individual measurable performance is evaluated at the time of their annual review,
9. Ensuring, at appropriate frequency, that safety, health, and related information is communicated to his/her employees,
10. Ensuring that all employees under their immediate control are aware of actions to be taken in the event of an emergency.

3.6 Finance Director

The Finance Director has responsibility for the day-to-day management of the finance function within Greenstar and for the supervision of all staff assigned to him / her.

Responsibilities:

1. To liaise with the CEO, Directors and Heads of Departments, Health & Safety Manager, HR and General Managers on matters of safety, health and welfare,
2. To report periodically on trends relating to public and employer liability insurance and compensation claims,
3. To ensure that each manager is aware of the cost of accidents and ill health in their departments,
4. To ensure that adequate financial resources are available to support the management and operation of the health and safety management programme,
5. To ensure that staff under his control are fully aware of their responsibilities in relation to Health & Safety.



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3.7 Human Resources (HR)

The HR Department are responsible for ensuring that:

1. The management team are advised on personnel aspects of safety matters as an integral part of personnel policy,
2. The duties of all staff in relation to safety and health are included in job descriptions,
3. All staff recruited are advised of the existence of the safety statement in their contract of employment,
4. All current and new employees receive a copy of the Greenstar staff handbook,
5. Staff are kept fully informed regarding statutory and other developments in safety, health and welfare pertaining to them,
6. All job descriptions, especially those of managers, technical and specialist personnel, adequately describes the responsibilities of the incumbent for occupational Health and Safety,
7. Appropriate and adequate training in occupational Health and Safety is available to all levels of staff,
8. Health and Safety training records are maintained in an appropriate central location,
9. Pre-employment medicals and occupational health surveillance programmes are implemented and that records are maintained,
10. Absenteeism records are examined in order to identify potential occupational health problems,
11. Policies and programmes for dealing with stress and bullying in the workplace are developed and maintained,
12. There is an adequate and workable disciplinary procedure in existence to deal with breaches of safety and health regulations,
13. Employees understand that adequate procedures are in place for consultation in any matter of concern,
14. There is adequate provision for supervision of staff to prevent improper conduct or behaviour.

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3.8 Contractors, Self- Employed and Visitors to Greenstar

Greenstar recognises that there are various occasions, when contractors and visitors are on the sites, that their activities may create hazards. In order to control such hazards, Greenstar requires all contractors to follow the general rules below:

Contractors must:

1. Submit their safety statement and / or method statement before commencing any activity, for approval, to the Health and Safety Department. This document will set out the site-specific safety precautions required while carrying out work on any of the Greenstar facilities.
2. Check if their activity may be subject to the particular sites permit to work system,
3. Familiarise themselves with the site safety rules, evacuation plans and emergency procedures,
4. Adhere to the Greenstar site safety rules at all times, adhere to health and safety legislative requirements and carry out works in a healthy and safe manner.
5. Confine them to the work area. If there is a requirement to work outside the site, inside the tenant areas, the site Operations Manager must be informed.
6. Take all precautions, so far as is reasonably practicable, to avoid any risk to themselves or anyone who may be affected by their acts or omissions,
7. Provide full and clear information to those who may be affected by their work activities, so as to reduce their exposure to risk,
8. Follow all Greenstar instructions and be aware of actions to be taken in the event of an emergency situation.
9. Provide adequate instruction, supervision, personal protective equipment and ensure that all relevant regulations and codes of practice are observed,
10. Report any accidents or near-miss incidents to the site Operations Manager or Safety Officer without delay and co-operate in any subsequent investigation of the accident or incident,
11. Leave all plant and equipment in a safe condition after work completion. They must clean up and remove all materials and equipment belonging to them.

Contractors must not:

1. Use tools or equipment, which are the property of Greenstar without prior permission of the site manager,
2. Seek the assistance of Greenstar's employees without prior permission of the relevant Manager.

Visitors must:

1. Be under the direct or indirect supervision of a staff member at all times,
2. Sign in and wear a security badge / distinctive sign (coloured hi-viz vest...)

Everyone must follow all signs, directions and rules at all times.

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3.8 General Duties of the Employer

Part 2, chapter 1, Section 8 of the Safety, Health and Welfare at Work Act 2005 (ROI) and Management of Health & Safety at Work Regulations 1999 states that employer's duty extends to the following:

- (a) Managing and conducting work activities in such a way as to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees;
- (b) Managing and conducting work activities in such a way as to prevent, so far as is reasonably practicable, any improper conduct or behaviour likely to put the safety, health or welfare at work of his or her employees at risk;
- (c) As regards the place of work concerned, ensuring, so far as is reasonably practicable
 - (i) The design, provision and maintenance of it in a condition that is safe and without risk to health,
 - (ii) The design, provision and maintenance of safe means of access to and egress from it, and
 - (iii) The design, provision and maintenance of plant and machinery or any other articles that are safe and without risk to health;
- (d) Ensuring, so far as it is reasonably practicable, the safety and the prevention of risk to health at work of his or her employees relating to the use of any article or substance or the exposure to noise, vibration or ionising or other radiations or any other physical agent;
- (e) Providing systems of work that are planned, organised, performed, maintained and revised as appropriate so as to be, so far as is reasonably practicable, safe and without risk to health;
- (f) Providing and maintaining facilities and arrangements for the welfare of his or her employees at work;
- (g) Providing the information, instruction, training and supervision necessary to ensure, so far as is reasonably practicable, the safety, health, and welfare at work of his or her employees;
- (h) Determining and implementing the safety, health and welfare measures necessary for the protection of the safety, health and welfare of his or her employees when identifying hazards and carrying out a risk assessment or when preparing a safety statement and ensuring that the measures take account of changing circumstances and the general principles of prevention.
- (i) Having regard to the general principles of prevention, where risks cannot be eliminated or adequately controlled or in such circumstances as may be prescribed, providing and maintaining such suitable protective clothing and equipment as is necessary to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees;
- (j) Preparing and revising, as appropriate, adequate plans and procedures to be followed and measures to be taken in the case of an emergency or serious and imminent danger;

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- (k) Reporting accidents and dangerous occurrences, as may be prescribed, to the Authority or to a person prescribed as appropriate, and
- (l) Obtaining, where necessary, the services of a competent person (whether under a contract of employment or otherwise) for the purpose of ensuring, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees.

3.9 Duties of Employees

Part 2, chapter 2, Section 13 and 14 of the Safety, Health and Welfare at Work Act, 2005 (ROI) and Health and Safety for Employees Regulations 1991 & Associated amendments (NI) states that employees shall:

- a) Comply with the relevant statutory provisions, as appropriate, and take reasonable care to protect his or her safety, health and welfare and the safety, health and welfare of any other person who may be affected by the employee's acts or omissions at work,
- b) Ensure that he or she is not under the influence of an intoxicant to the extent that he or she is in such a state as to endanger his or her own safety, health or welfare at work or that of any other person,
- c) If reasonably required by his or her employer, submit to any appropriate, reasonable and proportionate tests for intoxicants by, or under the supervision of, a registered medical practitioner who is a competent person, as may be prescribed,
- d) Co-operate with his or her employer or any other person so far as is necessary to enable his or her employer or the other person to comply with the relevant statutory provisions, as appropriate,
- e) Not engage in improper conduct or other behaviour that is likely to endanger his or her own safety, health or welfare at work or that of any other person,
- f) Attend such training and, as appropriate, undergo such assessment as may reasonably be required by his or her employer or as may be prescribed for use by the employee at work or for the protection of his or her safety, health and welfare at work, including protective clothing or equipment,
- g) Having regard to his or her training and the instructions given by his or her employer, mark correct use of any article or substance provide for use by he employee at work or for the protection of his or her safety, health and welfare at work, including protective clothing or equipment,
- h) Report to his or her employer or to any other appropriate person, as soon as practicable
 - Any work being carried on, or likely to be carried on, in a manner which may endanger the safety, health or welfare at work of the employee or that of any other person,
 - Any defect in the place of work, the systems of work, any article or substance which might endanger the safety, health or welfare at work of the employee or that of any other person,
 - Any contravention of the relevant statutory provisions which may endanger the safety, health and welfare at work of the employee or that of any other person, of which he or she is aware,



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- i) An employee shall not, on entering into a contract of employment, misrepresents himself or herself to an employer with regard to the level of training as may be prescribed below,
- j) A person shall not intentionally, recklessly or without reasonable cause:
 - Interfere with, misuse or damage anything provided under the relevant statutory provisions or otherwise for securing the safety, health and welfare of persons at work,
 - Place at risk the safety, health or welfare of persons in connection with work activities.

Failure to comply with the terms of the safety statement may result in disciplinary action. Such action is taken in accordance with Greenstar's Disciplinary Procedure.

3.10 Duties of Employees based on customer sites

Greenstar employees working on all customer sites are bound by the requirements of this safety statement and the requirements of the customer safety statement, health and safety procedures and health and safety work practices.

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4.0 RESOURCES

4.1 *Commitment*

Greenstar are committed to providing

1. Sufficient resources to implement the policy outlined in this safety statement,
2. Ongoing health and safety training (A health and safety training needs analysis is in place and reviewed annually for each site and a training matrix maintained),
3. Ongoing expenditure to maintaining the fleet, premises, plant and equipment,
4. Adequate time to individuals for training and administration of their Health and Safety duties; this includes Safety Reps, Safety Committee members, Fire Wardens etc.

Greenstar accepts that

1. The implementation of the safety management programme is dependent upon the provision of resources,
2. This safety statement sets out the resources in terms of time and people provided to secure the Safety, Health and Welfare of employees,
3. Considerable resources in securing the safety, health and welfare of employees in terms of personnel, time, materials, equipment and training are allocated,
4. Where significant amount of expenditure is required, resources may have to be allocated on a phased basis,
5. When required, Greenstar will engage external consultancy services,
6. Where new hazards are identified, Greenstar, in so far as is reasonably practicable, will provide for additional resources to control them,
7. Health & Safety information is also transmitted through safety bulletins, staff newsletter and team toolbox talks,
8. Staff is provided with the appropriate personal protective equipment.

4.2 *Budgeting for Health and Safety*

Greenstar shall ensure that adequate financial resources are allocated to the maintenance of health and safety at all Greenstar facilities.

The Group Health & Safety Manager shall prepare an annual Health and Safety budget and each General Manager will also include specific Health Safety items in their annual budget.

Provision shall be made in the capital budget for expenditure for:

- Mitigating hazards identified in a Risk Assessments,
- Any upgrade or change required for any Emergency Response Plan,
- The scheduled replacement vehicles plant and equipment.



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5.0 SAFETY MANAGEMENT

5.1 Safety Management Programme

Greenstar manage Health and Safety by continuously monitoring and reviewing performance. The Safety Leadership Team sets the Health & Safety Objectives annually and reviews them quarterly in accordance with relevant Key Performance Indicators.

Any proposed changes in infrastructure, work practices or staffing levels are also considered.

Responsibility for the execution of any required actions is allocated to designated personnel / organisation and appropriate time scales/ deadlines are allocated to any proposed actions.

5.2 New Employees

All new employees must participate and complete the Greenstar safety induction course before commencing work.

As part of the induction procedure, new employees will be introduced to the safety arrangements in operation at Greenstar.

During their first week of employment, the HR Department and relevant Operations Manager shall ensure that new employees:

1. Receive a copy of the Health and Safety booklet,
2. Accompany their direct manager on a guided tour of the workplace including familiarisation with emergency exits, firefighting equipment, and other safety measures,
3. Be familiarised with the safety arrangements in operation,
4. Be given the opportunity to study the safety statement and ask any questions,
5. Be provided with any personal protective equipment relating to their tasks and duties,
6. Be provided with adequate training and supervision to allow them safely complete their tasks,
7. Have their work performance reviews after 6 months to answer any queries and receive any further instruction.

5.3 Pre-employment Checks

Prior to engage temporary employees, it is necessary to establish the level of training and competence this staff will require to have before commencing work. The level of required training will be dependant on the nature and type of work involved. Operations managers will determine the required training levels.

5.4 Health Surveillance & Medical Fitness to Work

In accordance with Part 3 Section 22 & 23 of the SHWW Act Greenstar shall ensure that health surveillance appropriate to the risks at the waste facilities is available to all employees. An assessment of the medical fitness to work shall be carried out as required.



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6.0 CONSULTATION

The Safety, Health and Welfare at Work Act, 2005 and associated legislation places a duty on employers to consult with their employees.

It is stated that:

It shall be the duty of every employer

- a) consult their employees for the purpose of making and maintaining arrangements which will enable the employer and his or her employees to co-operate effectively for those purposes,
- b) in accordance with the arrangements referred to in paragraph (a), consult with their employees, their safety representatives or both, as appropriate, in advance and in good time regarding issues which effect the safety of employees.

It is stated that:

“Employees shall have the right to make representations to and consult their employer on matters of safety, health and welfare in their place of work”.

Greenstar will facilitate the appointment of Safety Representatives at all Greenstar facilities by requesting that candidates put their name forward for election or appointment depending on the number of candidates.

Greenstar will facilitate the appointment of safety committees where applicable as outlined in Section 6.3.

6.1 Safety Consultation

Consultation is an important part of safety management and Greenstar welcomes the views of employees. Greenstar consults its employees for the purpose of establishing and maintaining arrangements which will enable employees to co-operate effectively in promoting and developing measures to ensure their safety, health and welfare at work and in ascertaining the effectiveness of such measures.

All Employees are entitled to make representations to and consult their Manager on matters of safety, health and welfare in their place of work.

Greenstar will take into account of any representations made by employees as far as is reasonably practicable.

Matters relating to safety should always be discussed initially with the appropriate department manager.

Items may be referred to the site Safety Representative or the Safety Committee when, in the opinion of the employee, the initial response of the management is felt to be unsatisfactory, or when corrective action agreed by management is not implemented within a reasonable time.

Greenstar through the Safety Leadership Team will annually review the effectiveness of the consultation /communication process.



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6.2 Safety Representative

Employees have the right under Section 25 of the Safety, Health and Welfare at Work Act, 2005, to select a safety representative to represent them in matters of safety, health and welfare at work. It has been agreed in consultation with the Trade Unions to select the safety representative(s) by secret ballot. It is recommended that the person(s) selected shall hold the position for a period of three years in order to maintain continuity of the safety programme.

“Employees may, from time to time, select and appoint from amongst their number at their place of work a representative (in this Act referred to as the “safety representative”) to represent them in consultations with their employer”.

The Elected Safety Representative supports the safety and well-being of all staff and has the right to such information from Greenstar as is necessary to ensure, so far as is reasonably practicable, the safety and health of employees at the place of work.

Greenstar shall;

- ⇒ Take such steps as are practicable to inform the Safety Representative when an inspector of the Health and Safety Authority (HSA) enters the workplace for the purpose of making a tour of inspection, (other than a tour of inspection for the purpose of investigating an accident).
- ⇒ Consider any representations made to him or her and so far as reasonably practicable take any action that he or she considers necessary or appropriate with regard to those representations.
- ⇒ Allow the Safety Representative such time off from their work, without loss of pay, as is reasonable to enable the safety representative to acquire the knowledge and training and time to discharge their functions.
- ⇒ Give the safety representative a copy of the written confirmation, required under the Act and sent to the inspector, that an Improvement or Prohibition Notice has been complied with.

The Safety Representatives are charged with various tasks and responsibilities. The fact that the Safety Representatives have accepted responsibilities in no way releases any other individual from their own statutory obligations.

Any queries that staff may have in relation to safety, health or welfare at work should be initially addressed to their Supervisor. If unresolved the issue should be addressed to the site Operations Manager who shall record the query/complaint and outcome in writing. If the issue cannot be resolved, the matter may be referred to the Safety Representative. Where the issue remains unresolved, it may be raised at the next meeting of the Safety Committee.



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6.3 Safety Committee

Depending the number of employees, particular facilities may appoint a Safety Committee to assess the on-going progress of the safety management programme, as set out in the safety statement.

The site Operations Manager (or Deputy) chairs these committees.

The safety committee will be appointed in line with Section 26 and Schedule 4 of the Safety, Health and Welfare at Work Act 2005

The committee will meet every three months or sooner as required.

Minutes from the meeting are posted on notice boards.

6.4 Information

Any developments or alterations to the safety arrangements in operation in Greenstar shall be brought to the attention of staff via a memorandum or email issued by the Chief Executive.

All staff members are provided with a copy of the appropriate sections of safety statement and any revisions as applicable. Copies of the Safety Committee meeting minutes shall be displayed on the safety notice boards. Safety notices are placed in prominent positions throughout Greenstar Facilities.

All records of statutory safety inspections and Technical Services schedules relevant to safety systems, are available to the Safety Representative on request to the site Manager and the Health and Safety Manager.

The safety statement will be available on the Greenstar Intranet.

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7.0 ACCIDENTS & EMERGENCIES

The goal of Greenstar management is to provide an Accident, Incident and Injury Free working environment for all our employees, contractors, visitors and all those affected by our actions.

In the event of an accident, incident, dangerous occurrence or near miss, actions shall be taken in accordance with the waste facility specific emergency response plan.

If it is deemed necessary for an employee to go to A & E, **the injured person must not be allowed to leave the site** and arrangements must be made to bring the injured person to A & E immediately.

If an injury is not reported immediately but reported later in the day or any period thereafter the individual may be required to attend A & E immediately. The individual will be required to attend a scheduled appointment with the company Occupational Health Advisors.

7.1 Accident and Incident Reporting

All staff, sub-contractors and visitors are responsible for reporting all accidents, incidents, dangerous occurrences or near misses to their Supervisor immediately.

The Operations Manager/Senior Manager or Site Safety Officer are responsible for ensuring that all accidents, incidents, dangerous occurrences or near misses are reported verbally to the Group Health & Safety Manager immediately or as soon as is reasonably practical after the incident.

All accidents, incidents, dangerous occurrences or near misses must be formally reported to the Group Health & Safety Manager in accordance with the Greenstar Emergency Response Procedure – IP-15.

If an injury is not reported immediately but reported later in the day or any period thereafter the individual may be required to attend A & E immediately. The individual will be required to attend a scheduled appointment with the company Occupational Health Advisors.

If injury occurred as a result of the accident or incident that necessitates the injured party to be absent from work for more than three days then it is the responsibility of the Group Health and Safety Manager to ensure that the appropriate form (**IR1** form) is completed and forwarded to the HSA.

Where there is a dangerous occurrence, fire, explosion or a serious near miss it is the responsibility of the Group Health and Safety Manager to ensure that the appropriate form (**IR3** form) is completed and forward to the HSA

Copies of all accident/incident reports shall be maintained on each site for inspection as required.



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7.2 Accident Investigation

Greenstar shall investigate the circumstances of all accidents and determine their cause. Employees will be encouraged and expected to co-operate fully with such investigations.

Within 24 hours of an accident requiring medical treatment, a full incident report will be required after the Accident/Incident.

The Health and Safety Manager in consultation with the Site Operations Manager shall conduct an investigation (accompanied by the Safety Representative if requested). The Site Operations Manager shall complete a report on it. The Engineering Department will provide any required technical advice. All employees are obliged to co-operate with such investigations and to provide any information, which may be useful in establishing the circumstances surrounding the accident/dangerous occurrence.

The purpose of any investigation will be to:

- ⇒ Determine the root cause of the accident,
- ⇒ Identify any other contributory factors,
- ⇒ Determine the steps to be taken to prevent reoccurrence.

A record of any accident, incident, dangerous occurrence or near miss will be recorded and maintained with the purpose of reducing the risk of a similar situation arising.

Emergency procedures, reports and investigations are seen as an essential part of the safety management programme within Greenstar.

Risk assessments will be revised where necessary as a result of accident/incident investigations.

7.3 Dangerous Occurrence

“Dangerous occurrence” means an occurrence arising from work activities in a place of work that causes or results in—

- ⇒ The collapse, overturning, failure, explosion, bursting, electrical short circuit discharge or overload, or malfunction of any work equipment,
- ⇒ The collapse or partial collapse of any building or structure under construction or in use as a place of work,
- ⇒ The uncontrolled or accidental release, the escape or the ignition of any substance,
- ⇒ A fire involving any substance, or any unintentional ignition or explosion of explosives.



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8.0 WELFARE

Greenstar is committed to ensuring the welfare as well as the safety and health of all staff. Greenstar provides the following facilities:

8.1 Welfare

For the purposes of safeguarding and improving the health and welfare of all employees, Greenstar shall provide the following:

- ⇒ Adequate Hygiene Facilities,
- ⇒ Adequate Canteen Facilities,
- ⇒ Access to Medical Facilities/Personnel,
- ⇒ Pre-employment medicals,
- ⇒ Inoculations as appropriate,
- ⇒ Availability of trained First Aiders,
- ⇒ Monitoring of Attendance and Absenteeism.
- ⇒ Washing, toilet/shower and cloakroom facilities are provided in each site/work area.

The staff eating room and drying area will be made available to all employees.

8.2 First Aid

Where appropriate, minor wounds will be attended to on site. Where injuries require medical attention staff will be required to attend A & E or the companies Occupational Health Advisors (See section 7.0 Accidents and Emergencies Near miss for further details).

All employees in each unit/department/work area should know the exact location of the first aid box.

8.3 Drugs, Medication and Alcohol

1. If you are prescribed drugs or medication that may affect your ability to carry out your work, you must inform your Supervisor.
2. In the event of an employee who is receiving medication having an accident that requires hospital treatment, this information should be given to the hospital so that the correct treatment can be given.
3. Greenstar are committed to providing its employees with a drug and alcohol free workplace.
4. Employees shall not be under the influence of, use, distribute, possess, sell or purchase illegal drugs or alcohol while performing work for the company or on the company premises. Violations will result in disciplinary action up to and including termination of employment.
5. Employees may be asked to undergo a blood test where there is reasonable suspicion on the part of a Supervisor or Manager that an employee may be under the influence of an intoxicant or illegal drug.
6. Employees are reminded that they must not refuse any reasonable request to undergo such a test.



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9.0 PREGNANT EMPLOYEES

Where required, Greenstar will assess in writing any risk to the safety and health of pregnant employees, employees who have recently given birth and breastfeeding employees from any activity leading to risk of exposure to mother and child.

Greenstar will determine the nature, degree and duration of any exposure and take the preventative and protective measures necessary to ensure the safety and health of:

- ⇒ The employee herself,
- ⇒ The unborn child of the pregnant employee,
- ⇒ The child of a breastfeeding employee.

9.1 Preventative Actions

Where the Risk Assessment carried out reveals that is not practicable to ensure the safety or health of the employees concerned through protective or preventative measures Greenstar will:

- ⇒ Adjust temporarily the working conditions or the working hours of the employee concerned so that exposure to risk is avoided or
- ⇒ Provide the employee with other work that does not present a risk to safety or health, or if either of the above is not feasible, then employee leave should be granted or the periods of maternity leave extended.

9.2 Notification by the Employee

Regulations require the employee to notify her employer of her condition as soon as practicable after it occurs and to give her employer or produce for her employer's inspection a medical or other appropriate certificate confirming her condition.

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10.0 HARASSMENT & BULLYING

10.1 Definition

Bullying in the workplace is repeated aggression, verbal, psychological or physical, conducted by an individual or group against another person or persons. Bullying is where there is aggression or cruelty, viciousness, intimidation or a need to humiliate or dominate relationships.

10.2 Policy

Greenstar will not tolerate bullying behaviour.

Individuals who feel that they are the victims of bullying should contact their supervisor.

If they feel they cannot approach their Senior Manager they should contact either the Human Resources Department directly or the elected Safety Representative.

The Human Resources Department have a program to assist victims of bullying.

Disciplinary action will be taken against any employee or trainee who is in breach of the company anti-bullying policy.

The Greenstar "Open Door" Policy provides details on the company bullying policy. This policy can be obtained from the HR Department, Site Operations Manger, Safety Representative or Group H&S Manager.

10.4 Forms of Bullying

Greenstar recognises the following behaviour as forms of bullying:

- ⇒ Physical contact
- ⇒ Verbal abuse
- ⇒ Implied threats
- ⇒ Jokes, offensive language, gossip, slander, offensive songs.
- ⇒ Posters, photocopied cartoons, graffiti, obscene gestures, flags, bunting and emblems
- ⇒ Isolation or non co-operation or exclusion from social activities
- ⇒ Coercion for sexual favours
- ⇒ Intrusion by pestering, spying and stalking
- ⇒ Repeated requests giving impossible deadlines or impossible tasks
- ⇒ Repeated unreasonable assignments to duties, which are obviously unfavourable to one individual
- ⇒ Vandalism of personal property (destroying clothing, scratching paintwork of cars)

Greenstar's anti-bullying policy is outlined in the Greenstar employee handbook, Section 1.1 and conforms to the current HSA Code of Practice.



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11.0 STRESS

11.1 Definition

Stress occurs in the work place where the pressure of work exceeds the individual's ability to cope. Stress is a natural reaction to excessive pressure it is not a disease. Where stress is excessive and is present for some time it can lead to mental and physical ill health.

11.2 Policy

Greenstar recognise its responsibility to ensure that its employees are not exposed to ill health through excessive work related stress.

Greenstar will employ organisational measurers through the department managers to avoid excessive workloads.

Where required Greenstar will provide employee assistance programmes to assist individuals who are suffering from work related stress.

In a situation where an individual feels they are suffering from stress, they should contact the Senior Manager.

If they feel they cannot approach their department manager, they should contact either the Human Resources Department directly or the elected Safety Representative.

12.0 HAZARD IDENTIFICATION & RISK ASSESSMENT

12.1 Risk Assessment Process

Section 19 of the Safety, Health and Welfare at Work Act, 2005 requires the safety statement to be based on the identification of hazards and an assessment of the risks to safety and health at the workplace.

Definition: A risk is the likelihood of a specified undesired event occurring within a specified period or in specified circumstances.

Our objective is to outline a system, which will reduce the risk to a tolerable level. Our target will be to reduce the level of potential exposure to injury to as low a level as is practicable within all operations.

Site-specific risk assessments are carried out applicable to Greenstar waste facility operations and documented procedures are written based on the results of those risk assessments. The Greenstar Risk Assessment Procedure – IP-02 provides details of the risk assessment process, updates to risk assessments, communication of the associated risks and hazards and review of the risk assessments.

Documented risk assessments are available for inspection at each site.

Definition: A hazard is any substance, article, material or practice that has the potential to cause harm.

Hazards in Greenstar are identified in a systematic manner by written safety audit, which is carried out on an annual basis. The audit involves visiting each work area/department, examining the work environment, equipment, procedures and consulting with supervisors and employees.



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Employees who detect a hazard are required to report it without unreasonable delay to their Supervisor or Operations Manager.

12.1 **Responsibility:**

The Site Operations Manager is responsible for ensuring that site specific risk assessments are carried out and updated and reviewed in accordance with the Risk Assessment Procedure – IP-02

12.4 **Communication**

Risk Assessments and associated documentation shall be communicated to all relevant persons. Where there is a requirement to modify a risk assessment or associated procedure, all effected personnel will be issued with a written copy of the same and receive direct instruction in relation to implementation from the Site Operations Manager. Documentation will be updated and where required communicated at the regular site safety meetings.

12.5 **Sub-contractors**

Some of the equipment on site requires maintenance and repair by specialist sub-contractors. All contractors are subject to the site “permit to work” system and site specific emergency procedures. Specific safety instruction procedures will be included with the issue of these permits.

Routine operational hazards for the maintenance of equipment have been identified. Sub-contractors working on site are required to inform the Site Manager of any particular hazard that might arise during the course of their work. A pre operations hazard assessment will be carried before commencing any non-routine activity. Site management requires that a task specific method statement be prepared for all non-routine activity.

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13.0 PERSONAL PROTECTIVE EQUIPMENT

Greenstar have developed a policy on the use of Personal Protective Equipment - PPE. The organisation intends to regularly review this policy and to update it as necessary. The review will consider the experiences to date changes in work arrangements and practices. Where risks to employees cannot be avoided by technical means of collective protection or by work organisation, personal protective equipment will be provided.

The personal protective equipment will:

- ⇒ Be appropriate for risk involved,
- ⇒ Take account of existing conditions at the place of work, and of requirements and the employee's state of health, and fit the wearer correctly.

PPE. provided will comply with relevant European Community Directives, regarding design and manufacture. It will be maintained in good working order and in satisfactory hygienic condition by providing storage, maintenance, repair or replacement.

Where PPE. is used, the employee will:

- ⇒ Be informed of the risks against which the equipment protects him/her;
- ⇒ Be provided with information on the PPE.;
- ⇒ Be given instruction on the use of the PPE.;
- ⇒ Be provided with training or appropriate demonstration in wearing of such equipment;

Where required the equipment will be given out annually and replaced when worn out.

Spare equipment will be maintained on site in the event of loss or damage.

The Site Operations Manager is responsible for completing the assessment, maintaining the equipment and providing instruction and training.

It is the duty of every person issued with PPE to wear and use it as instructed and for the purpose intended.

14.0 FIRE SAFETY

Greenstar is committed to fulfilling all statutory obligations in relation to fire safety and aims to ensure the safety of staff through the implementation of an Emergency Response Plan at each site.

Fire evacuation drills will be held every six months on all sites. All areas have instructions on the action to be taken in the event of activation of the fire alarm and on the discovery of fire.

Dates of drills etc. are logged in each of the facilities Fire and General Register.

The Fire Marshal at each facility ensures that all the fire safety measures provided are adhered to. The Fire Warden in charge of any building/unit/area shall report as soon as possible any damage to these fire safety measures.

The Emergency Response Plan addresses the systems and fire safety measures in place, the provision of information on fire safety measures, and actions to be taken in the event of an emergency situation including a fire.



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15.0 TRAINING AND INSTRUCTION

Greenstar recognises that training and instruction of staff by competent personnel is essential in ensuring the safety and health of the workforce.

All instruction, training and supervision will be provided in a formal manner and in a language that is reasonably likely to be understood by the employee concerned.

It shall be a condition of employment that all employees participate and complete a basic induction course before starting work at any Greenstar Facility.

15.1 Induction

All new employees must receive Safety, Health and Induction Training, which will include an introduction to Greenstar, a description of the works to be carried out and an explanation of the duties imposed by the Health and Safety Legislation which affects the individual

Greenstar ensure training is managed in accordance with the current Competence, Training & Awareness Procedure – IP-06. This procedure provides details in relation to induction training for all persons working for and on behalf of Greenstar, identification of training requirements, provision of ongoing training, understanding of training and evaluation and sign off of the training provided.

15.2 Training Resources

Resources are allocated in relation to the provision of health, safety and welfare training with Greenstar.

16.0 DISCIPLINARY ACTION

Disciplinary Action will be taken where compliance with Safety and Health rules/regulations cannot be achieved through advice and persuasion.

Violation of Safety Guidelines shall be addressed by the following procedure.

- ⇒ Step 1 Verbal Warning
- ⇒ Step 2 Written Warning
- ⇒ Step 3 Final Written Warning
- ⇒ Step 4 Removal from site, suspension or termination of employment

Depending on the gravity of the breach, Steps **1, 2 and 3 may be by-passed.**

OR

Disciplinary action, up to and including dismissal, will be taken where compliance with Safety and Health rules/regulations cannot be achieved through advice and persuasion.

Disciplinary procedures will be in accordance with employees' Contracts of Employment and the Employee handbook.



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17.0 EMERGENCY PLAN

All Greenstar waste facilities have a site specific Emergency Response Plan to ensure a co-ordinated site response to all foreseeable emergency situations. An Emergency Preparedness & Response procedure is also implemented on all waste facilities.

The emergency procedures will be reviewed regularly to ensure that they take account of all changes in processes, equipment, personnel, standards etc.

Evacuation drills will be carried out every six months so that all employees are familiar with escape routes and the procedures to be followed.

Responsibility for the organisation of evacuation drills will rest with the Site Fire Marshal.

18.0 SAFETY STATEMENT REVISION

Greenstar will, taking into account any risk assessments carried out, review the safety statement at least annually or more frequently where:

- (a) There has been a significant change in the matters to which it refers,
- (b) There is another reason to believe that the safety statement is no longer valid, or
- (c) An inspector in the course of an inspection, investigation, examination, inquiry under section 64 of the Safety, Health & Welfare at Work Act 2005 or otherwise directs that the safety statement be amended within 30 days of the giving of that direction,

Following the review, Greenstar shall amend the safety statement as appropriate and communicate the amendments accordingly.

19.0 DIRECTORS REPORT

Greenstar will prepare or have prepared an annual Health & Safety Report for inclusion in the Annual Board Report. Issues arising in the Annual Health & Safety Report will be included in the Goals & Objectives set by the Board of Directors for the coming year.



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Emergency Response Plan

for

Greenstar Environmental Services Ltd
Limerick

**Dock Road,
Limerick.**

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Section 1.0 INTRODUCTION

This document is a site specific Emergency Plan for **Greenstar Environment Services Ltd**, Dock Road, Limerick. It outlines the procedure to be followed in the event of an Emergency. It contains information on the site facilities, equipment, emergency systems, documents and procedures.

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Section 2.0 SITE INFORMATION

2.1 Description of Premises

The site is located in the townland of Ballykeeffe, off the main N69 Foynes to Limerick road on the Dock Road, County Limerick. It is an industrially-zoned area and is bounded to the south, southeast and southwest by industrial premises. To the east & northeast is the Ballinacurra Creek, which is a tributary of the Shannon. The site is entered from the Dock Road, through a common access road. The site occupies an area of 1.8 hectares. The site boundaries are secured on all sides by high walls or palisade fencing. The entire open yard area is paved with a concrete slab.

Refer to the site plan in Appendix 1 for site layout Plan and location of emergency systems.

2.1.1 Buildings

a) Main Process Building & Office Block

There is one main process building of approximately 3265m² that houses waste and recycling activities.

There is a loading ramp at the northern end of this building. A separate two-storey Office block and garage/workshop is located along the southern boundary of the site near the entrance gate and weighbridge.

2.1.2 Site Facilities

The facility obtains water from the municipal water supply system provided by Limerick County Council. Sanitary wastewater discharges to an on-site Klargester foul water treatment plant and percolation area at the northwest of the site.

There is an electricity power supply provided by the Electricity Supply Board and a sub-station on the south west boundary of the site.

There is a weighbridge adjacent to the office block for use in weighing materials in and out of the facility. A bin wash area is located to the north of the waste transfer building, but is not in use. A segregated civic amenity area is located to the south east of the yard and holds skips & bins for self-delivering clients.

2.1.3 Emergency Systems

- Fire detection systems : (i) The office is monitored by a fire detection system controlled from the Facility Manager's office. (ii) A separate fire detection system, controlled from the plant room in the south-west corner of the main process building, monitors the recycling and waste process areas.
- Four fire hydrants are located within the site for fire fighting purposes.
- Standpipes, hoses, bars and keys for the hydrants are held beside the diesel tank.
- Three firehose reels are located in the main process building: (i) at the entrance to the general waste area, (ii) at the emergency exit door below the MRF line, and (iii) at the entrance to the recyclables baling area.

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- There is a fire alarm system in place throughout the site with break glass units at every exterior doorway and at the top of the office stairs.
- There are serviced fire extinguishers throughout the facility and fire blankets in the canteens.
- Two electricity isolation points are available: (i) at the plant room in the south-west corner of the main process building, and (ii) in the garage to the right of the personnel entrance.
- A shutoff valve to protect surface water from spills or fire water is located at the eastern boundary of the site, immediately outside the access gate in the palisade fencing and prior to emission points FE1A & B.

2.2 Access and Egress

Entrance & egress to the site for all movements is through large gates at the Dock Road boundary, along approximately 120m of common access road, through the main gate of the site and into the car park or onto the weighbridge for waste operations.

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Section 3.0: RISK ASSESSMENT METHODOLOGY

3.1 Analysis of the work area

Potential safety hazards are identified based on a practical knowledge of site operations, review of audit reports, legal and regulatory requirements and observation of site work activities.

* All hazards identified will be subject to the Risk Assessment process, which involves:

- Identification of the hazard
- Identification of who may be harmed
- Identification of current control measures
- Assessment of risk (in terms of severity)
- Identification of additional control measures
- Implementation of control measures and reduction of risk

* The following scoring system is applied:

Risk Calculation: PE x FE x LC x NP x MPL = Risk Category											
Probability of Exposure (PE)		Frequency of Exposure (FE)		Legal Compliance (LC)		Number of Persons Exposed (NP)		Maximum Probable Loss (MPL)		Risk Category	
Very unlikely	0.05	Infrequently	0.1	No applicable legislation	1	1-2 persons	01	Fatality	15	Acceptable Risk	000 – 001
Unlikely	01	Annually	0.2	Compliant with applicable legislation	2	3-7 persons	02	2 Limbs/ eyes/ serious condition	08	Very Low Risk	002 – 005
Possible	02	Monthly	1.0	Breaching Legislation	10	8-15 persons	04	1 Limb/ eye/ serious condition	04	Low Risk	006 – 010
Even Chance	05	Weekly	1.5			16-50 persons	08	Major Break/ minor illness	02	Significant Risk	011 -50
Probable	08	Daily	2.5			>50 persons	12	Minor Break/ minor illness	01	High Risk	051-100
Likely	10	Hourly	4.0					Laceration/ Mild ill health	0.5	Very High Risk	101-500
Certain	15	Constantly	5.0					Scratch/ Bruise	0.1	Extreme Risk	501 – 1000
										Unacceptable Risk	>1000

With the Hazard Risk Number (HRN), and the category of the risk, we can evaluate which hazard is the most critical. Dependent on the severity, appropriate mitigation will be applied in order to decrease the level of risk and decrease the HRN.

3.2 Review

The risk assessment will be reviewed:

- On an annual basis at minimum,
- As a result of the introduction of new operations, equipment and/or personnel,
- Following an accident, incident or non-conformance,
- As a result of a change in legal and regulatory requirements, codes of practice or Greenstar best practice.

3.3 Risks Identification

All risk identified are detailed in the risk assessments, with appropriate control measures specified. The Risk Assessment are retained within Scannell solution[®] software.

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Section 4.0 RESPONSIBILITIES

An organogram is presented in Appendix 3 to identify roles and responsibilities on this site.

4.1 Depot Manager/Operations Supervisor – Fire Officer

By his/her position, the Depot Manager is also the Fire Officer of the site. In his/her absence, the Facility Manager shall take the responsibility and authority of this role.

The main responsibilities are:

- To assess the suitability of the fire equipment in accordance with site requirements and activities.
 - Review the suitability of the fire equipment annually.
 - To ensure all new buildings have a valid fire certificate and take the necessary steps to revise and update this document when required,
 - To ensure that necessary resources (material and time) are made available for the implementation of the Emergency Plan and the related training.
1. Risk assessment:
 - Ensure a Risk Assessment of the premises is carried out in relation to fire or other emergencies,
 - Update this document as required, but annually as a minimum.
 2. Nominate persons with particular responsibilities (e.g. Fire Wardens) to be taken in emergency situations. Ensure that there is a fire warden responsible for all areas of the site.
 3. Ensure that the required Fire Safety Training is carried out and that the Fire Wardens fully understand their duties.
 4. Report to relevant Department (i.e. HS and or Environment) as soon as possible.
 5. Together with the Facility Manager, prepare an Emergency Evacuation Procedure (see section 6.0 of this document),
 6. Ensure that all employees are fully aware of the Emergency Evacuation Procedure and that they can evacuate as quickly as possible in the event of an emergency,
 7. Organise six monthly fire evacuation drills,
 8. Keep a full record of:
 - All evacuation drills,
 - All responsible persons,
 - Fire safety training,
 - Records of fire equipment maintenance,
 9. Receive reports from fire wardens on particular fire hazards and arrange for the removal of all fire hazards reported,
 10. Keep Fire Wardens up to date on all matters affecting fire safety,

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11. Select a more suitable assembly point in consultation with the Facility Manager and the Fire Wardens, if different than the one proposed in this document,,
12. Ensure that fire evacuation notices and maps are complete and posted prominently throughout the building,
13. Ensure there is a sufficient number of Fire Wardens appointed,
14. Ensure that there is an effective audible means of raising the alarm in the event of an emergency,
15. Ensure that all fire fighting equipment meets the required standards and that it is maintained and certified as required,
16. Ensure all emergency lighting meets the appropriate standard and that it is certified at the required intervals by a competent person,
17. Liaise with the local Emergency Services on an annual basis, notifying them of details of the Emergency Plan,
18. Coordinate Emergency Response and liaise with the Emergency Services Fire Officer on their arrival,
19. Ensure all Hazards (i.e. Gas, Chemicals etc.) which may pose a threat to the safety of the Emergency Services are identified,
20. Prepare the “Emergency Pack” for the Emergency Services (see section 5.0 of this document)

Following any emergency there is a possible requirement for further specialist assistance as recommended by the Emergency Service. Such assistance will be assessed depending on the emergency situation

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4.2 Fire Wardens

1. Ensure all emergency signs are in position,
2. Ensure all corridors, passageways; fire escapes, escape routes and exits are unobstructed,
3. On a daily basis, ensure all fire doors are operable and emergency exit doors are unlocked,
4. Carry out a weekly check of all fire appliances to insure they are in the correct place and un-discharged,
5. On a daily basis be aware of the number of people within his/her area of control,
6. On hearing the fire alarm ensure that all persons in his/her area are safely evacuated to their designated assembly point,
7. Conduct a roll call at the assembly point and report to the Fire Officer
8. Inform the Fire Officer of any missing persons and give if possible an indication of their last location.

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Section 5.0 EMERGENCY SERVICE SUPPORT

5.1 Emergency Pack

The **Fire Officer** will prepare an **Emergency Information Pack** and store it at Reception for the Emergency Services. This pack will contain:

- 1) An outline drawing of the premises showing exits and fire precautions,
- 2) Information on any special hazards (e.g. Flammable liquids, Chemicals, Gases etc.) and their location,
- 3) Location of isolation switches,
- 4) Location of fire hydrants,
- 5) Location of fire assembly point

5.2 Escape Route Plan

A plan of the premises is available in a visible location to persons entering and exiting the building.

The plan indicates the location escape routes, fire fighting equipment, gas, electricity, the control panel for any fire detection or alarm system, installations such as fuel and oil tanks, and other areas of high fire risk by reference to the point at which the plan is displayed.

A floor plan is displayed in a prominent position in each area indicating the escape routes by reference to the point at which the plan is displayed.

A copy of the Plan is included in the Emergency Pack for the Officer in charge of the Emergency Services.

All plans are displayed on durable material, are easily legible and of a suitable scale.

It is the responsibility of the Fire Officer to ensure that this plan is up-to-date, displayed in the appropriate location and revisions communicated to the appropriate staff.

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Section 6.0 EMERGENCY PROCEDURE

Condition 10.2 of EPA Licence W0082-02 stipulates that in the event of an emergency, measures should be taken to address the hazard and notify appropriate Authority. To that extent, the Greenstar EHS department should be contacted ASAP but no later than 24H (following working day) after the emergency arose.

6.1 Emergency definition

An emergency may constitute a fire, an explosion, a spillage, acceptance of an unexpected hazardous or clinical waste, a breakdown of equipment or any of the above that would pose as a risk to human health and safety or to the environment. The previous sentence is not an exhaustive list.

6.2 First actions

If an employee sees any personnel in difficulty, he/she should:

- Consider own safety - employee may need to withdraw from the area immediately.
- Contact a more senior member of staff as soon as possible

The manager will then:

1. Give instructions regarding assistance and possible evacuation of the person in difficulties. (see different scenarios later in this document)
2. Instruct the Weighbridge Operator to control vehicle entry to the site to prevent traffic problems.
3. Arrange for the evacuation of other personnel if appropriate. This may involve ceasing certain activities in vehicles or plant.
4. In the case of spillage, arrange for deployment of appropriate spill containment materials, activation of shut off valves and application of drainage mats.

6.3 Second actions

- 1) Inform the Operations Manager,
- 2) Close off any relevant areas of the site and inform the Weighbridge of any temporary arrangements for traffic movement on the site,
- 3) Arrange to inspect the area where the incident occurred,
- 4) Inform the relevant Greenstar department (Environment and / or HS) and seek advice for any other external communication, in case of HS incident, the facility is responsible for external communication with HS department
- 5) Take statements from persons witnessing the incident,
- 6) Compile all the witness statements in a report,
- 7) Write a non-conformance report, if applicable,
- 8) Record the incident in an incident report form.

Under certain conditions, it may be necessary to close the site either partially or completely to customers and/or visitors.

If applicable, the relevant Authorities will be informed by the EHS Team of the incident and/or site closure as well as the reasons for it and corrective/preventive actions to be taken/required in order to resume normal business.

These second actions can be followed either during or after the incident depending on the nature of the situation.

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6.4 **Scenario One:** *On discovering a fire*

Follow the procedure below. The person discovering the fire should:

- 1) Immediately raise the alarm by giving verbal warning to those nearby, or by operating the nearest break glass unit or using an air horn or using the internal radio system.
- 2) Contact your direct senior person who will escalate the information ASAP to the Fire Officer / Facility Manager / Operations Manager or his/her deputy. At that stage, the Fire Officer will decide if the fire brigade should be summoned or not. If the fire brigade should be summoned, the Fire Officer might delegate the call to whoever is deemed competent to do so. This person will immediately contact the Emergency Services by dialling 112 or 999, requesting the fire brigade. He/she will provide the fire brigade with:
 - the address,
 - the location of the premises,
 - The phone number of the premises,
 - And any other relevant information to hand as regards the fire and state of evacuation.
- 3) On hearing the warning of fire or the fire alarm, all the people in the concerned building should immediately leave by the nearest exit. Any Fire Warden should immediately commence their designated duties. The Fire Officer will retrieve the fire register and the emergency pack and proceed to the designated assembly point from where he will coordinate the emergency response plan.
- 4) The site administrative staff and the Operations Manager, if different, will join the Fire Officer to help coordinate the Emergency Response.
- 5) The Fire Wardens will evacuate their respective areas, take a roll call at the assembly point and report to the Fire Officer.

Fire assembly point is located at the boundary fence beyond the weighbridge..

If necessary, another assembly point will be designated by the Fire Officer.

- 6) Fire Wardens must inform the Fire Officer of any missing persons and if possible their last known whereabouts.
- 7) The Fire Officer will liaise with the Emergency Services on arrival and, using the Emergency Pack, advises the Emergency Services Senior Fire Officer of any additional hazards (i.e. gas bottles, electricity, toxic chemicals, paints etc.)
- 8) When the fire is out and cold, treat as a spillage by using appropriate precautions as toxic/hazardous substances may be present. Appropriate measures are taken to dispose of substances as waste material in a safe and environmentally responsible manner.

No one can re-enter the building until the Fire Officer gives the all clear.

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6.5 **Scenario Two:** *If a load is identified on fire*

Case one: While load still in the lorry

1. Park the lorry in an isolated part of the facility
2. According to the situation:
 - a. proceed to tackle the fire with onsite material (small fires or slow-burning fires) and trained employees
 - b. If the risk is deemed to great, (i.e. the load is fully on fire) then contact the fire brigade.
 - c. keep the area clear in case of explosion

No personnel shall be put at risk while tackling a fire.

Case two: When the vehicle tips its load

1. Often, the fire may only become apparent when the vehicle tips its load and air feeds the fire. Under these circumstances, the fire may be put out using site equipment (fire hose), if possible, but the emergency services must also be called.
2. In the unlikely event of waste itself catching fire, site staff should attempt to smother the fire, utilising the fire hose:
3. In the event of a fire on site, the EPA will be notified accordingly and an assessment of damage will be conducted by a competent person, internal or external depending on the severity of the fire and damage.
4. In the case of a fire with the potential to affect neighbouring properties, either with direct impact of fire or with smoke or fumes blown away from the facility, immediately contact the neighbouring residents.

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- 6.6 **Scenario Three:** *On hearing the fire alarm*
- 1) Leave the Building by the nearest emergency exit,
 - 2) Do not rush,
 - 3) Obey the instructions of the Fire Warden,
 - 4) Do not stop to collect personal belongings,
 - 5) Where possible close (but do not lock) doors and windows on your way out, this helps to stop fire spread,
 - 6) Go directly to the designated Assembly Point, staying upwind of any smoke or fumes where possible
 - 7) Remain at the Assembly Point and do not attempt to re-enter the building until the all clear is given.

The Fire Assembly Point is identified on the site plans and sign posted.

The Fire Officer may decide to move personnel further away from the building for improved safety.

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6.7 **Scenario Four:** *Spillage Procedure*

- 1) Raise the alarm by informing the Site Supervisors/Management as soon as possible.
- 2) If there is release of odour, fumes, smoke, gas or dust, evacuate to a safe distance. Stay upwind in such cases. Keep others away.
- 3) **Immediate priority is to prevent contamination of watercourses, surface water drains, and sensitive areas therefore shut off valves must be activated straight away depending on the quantity of the spillage.**
- 4) **If safe to do so**, use appropriate PPE and contain the spillage using spill containment material (absorbent material and drain covers). Place containment booms around the spillage if appropriate.
- 5) Clean up the spillage into a suitable designated container. Arrange storage in a safe bunded location until appropriate disposal can be organised in accordance with current legal and regulatory requirements. This will involve the use of specialist licensed contractors to bring the material to a licensed facility.
- 6) Report the incident to the Greenstar EHS department which will then be reported to the relevant Authority (ies) and / or Agency (ies).

For small spills, (i.e. with diesel spills):

- 1) Use site absorbent material
- 2) Collect up such absorbent material after use and store in a labelled container in designated bunded area to await disposal.
- 3) Storage and disposal prior to consignment off site will be as per No. 5 above and will be in accordance with the current waste Regulations.

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6.8 **Scenario Five:** *Handling hazardous and chemical waste*

What to do when unexpected hazardous, chemical, or clinical waste arrives at the site?

All waste accepted at the facility is presumed to be non hazardous until a visual inspection is carried out within the confines of the material recovery building. Greenstar have strict off-site classification methods for commercial customers and clear instruction are given to the general public about the contents of their waste bins and skips.

Actions are taken depending on when the waste is discovered and the ease with which it can be identified.

1. If waste is identified whilst still in the lorry at the weighbridge, the lorry will be turned away at the weighbridge and sent to location of origin. The Waste Rejection Form (EF-06A) shall be completed.
2. If waste is discovered during tipping, the unacceptable waste should be re-loaded into the lorry that delivered it and the waste removed from site and sent back to location of origin. The Waste Rejection Form (EF-06A) shall be completed.
3. Greenstar Ltd – Kilkenny are not permitted as per Waste Permit (WFP-KK-09-0003-01) to accept liquid waste, but in the case where a load has been accepted and then found to contain stray drums or containers with liquid contained within them, it is deposited on site:
 - a. Machinery will remove the containers/drums ,
 - b. Containers/drums removed will be located in the bunded quarantine area and stored with appropriately.
 - c. A suitable facility will be sourced for this material and appropriate haulage arrangements will be made

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6.9 **Scenario Six:** *Waste rejection at final destination*

- 1) Contact your Greenstar dispatch depot. Give details of waste origin, reason for rejection, facility from which the waste was rejected,
- 2) Greenstar offices will arrange an alternative appropriate facility to accept the waste,
- 3) Obtain a rejection note from the facility,
- 4) Transfer waste to appropriate facility.

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- 6.10 **Scenario Seven** *Incident resulting in first aid requirements*
- 1) Contact first aiders ASAP; See Emergency Contact Numbers IF-15A.
 - 2) Inform management (if not done via first aider himself or other colleague (witness of the incident))

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6.11 **Scenario Eight:** *Site wide evacuation*

If an emergency is raised in an area, the following actions shall be taken:

- 1) All employees in the concerned building are evacuated as soon as possible under the instruction of their area fire warden,

- 2) The Fire Officer maintains contact with all Fire Wardens and contact fire brigade where relevant (drills do not necessitate fire brigade intervention).

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6.12 Containment plan for fire water after a fire event

See scenario four

- 1) Raise the alarm: inform the site management as soon as possible.
- 2) If there is release of odour, fumes, smoke, gas or dust, evacuate to a safe distance. Stay upwind in such cases. Keep others away.
- 3) Site management will insolate the area by shutting off the foul or surface water valve if incident is upstream of the valve.
- 4) **If safe to do so**, use appropriate PPE and contain to cover the spillage using spill containment material. Place containment booms around the spillage if appropriate.
- 5) **Immediate priority is to prevent contamination of watercourses and sensitive areas.**
- 6) Report the incident to the Greenstar EHS department and relevant Authority (ies) and / or Agency (ies).

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Section 7.0 FIRE FIGHTING EQUIPMENT

7.1 Fire Extinguishers

Area fire warden checks fire extinguishers monthly.

Site management records the results of these monthly checks.

A competent person must inspect Fire Extinguishers annually, according to I.S. 291:2002.

Site management records the results of these annual inspections.

7.2 Fire Hydrants

Fire hydrants must be tested annually to ensure the static pressure; the flow rate and the residual pressure are adequate according to BS 9999:2008. This monitoring is recorded during the inspection of the fire fighting equipment.

See location on the site map in Appendix 1.

7.3 Fire Fighting

Life safety is the first priority in the event of a fire.

Fire fighting is of lower priority until the life safety from fire of the occupants is assured.

A fire should be attacked immediately after the alarm is raised **only if it is safe to do so**. Only trained staff will attempt to tackle a fire. Such action should always be done with a buddy system in place.

Always keep the escape route clear; never let the fire get between you and your escape route.

If attempts to extinguish the fire cannot be continued without danger or if they are clearly failing to keep the fire under control, the fire fighter should **withdraw immediately**.

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Section 8.0 EMERGENCY PLAN REVIEW AND TESTING

8.1 Review

The Fire Officer and a member of the EHS Department will review the Emergency Plan annually for adequacy. The Emergency Plan is revised and updated as required.

8.2 Testing

A bi-annual test is carried out. Improvement opportunities and deficiencies arising from these tests are recorded and integrated into the emergency Response Plan.

Evacuation drills will form part of the recorded testing process as detailed below:

- Evacuation times
- Operation and effectiveness of emergency systems
- Access and availability of equipment
- Emergency Contacts accuracy
- Emergency Response Team effectiveness
- Training issues
- Communications
- Signage
- Site visitors response/control

Documented results of the test, together with improvement actions and the proposed timetable, will be communicated to the EHS Department for support and approval.

The emergency pack is retained for communication with emergency services.

The Emergency Response Plan is communicated at each revision to the local Fire Brigade.

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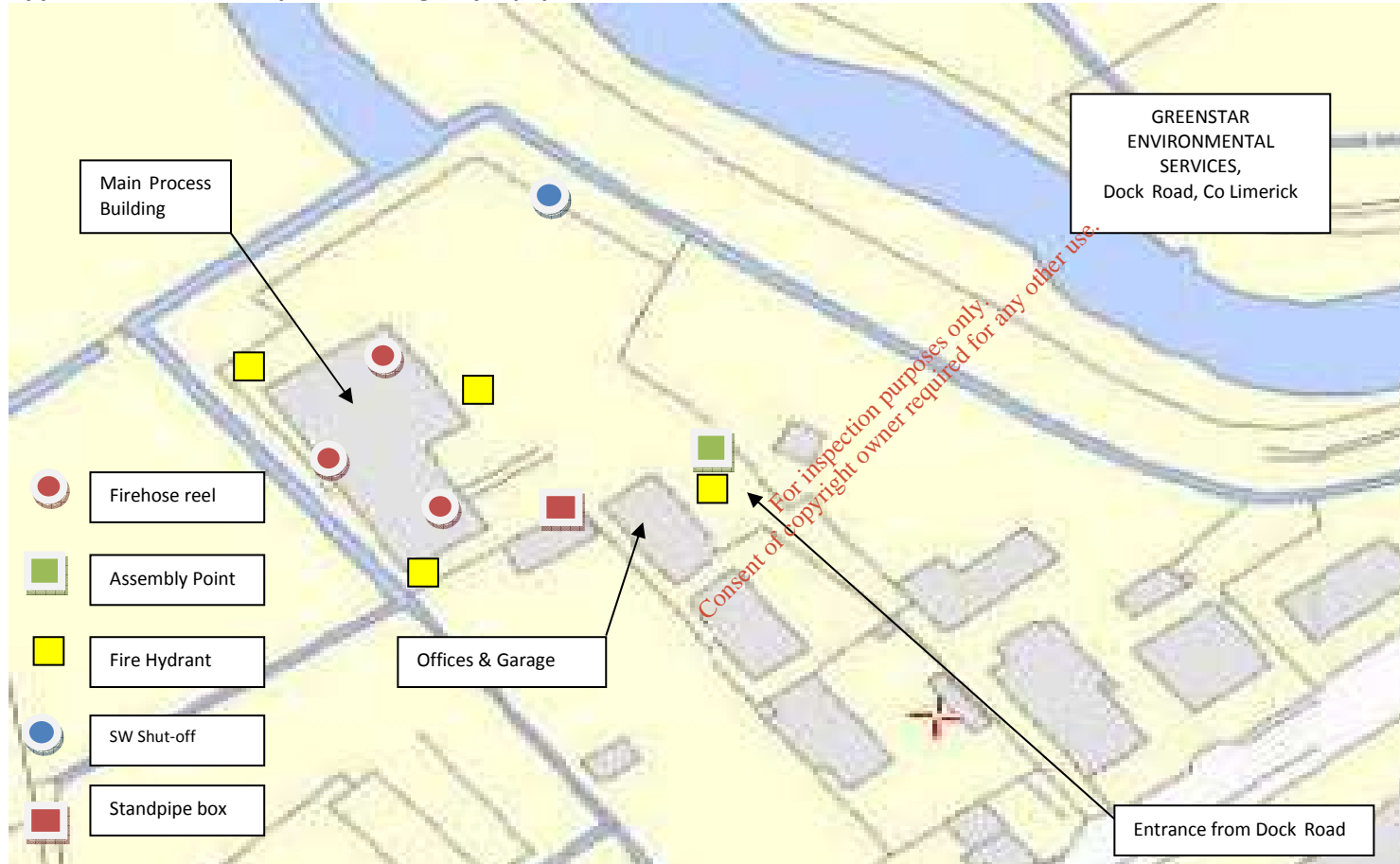
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Appendix 1: Site Map with Emergency Equipment





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Appendix 2: Emergency Contact Numbers

External Contracts – Please Refer to IF15-A – Emergency Contact List

Internal Contacts

Title	Name	Int.	Ext.	Mobile	Location
Depot Manager	Mary Dwane	-		086-6059549	Limerick
Facility Manager	Michael Whelan	-	-	086-1722247	Limerick
Group Health & Safety Manager	Oliver Callan	4217	01 8649417	086- 6013909	Millennium Park
Group Health & Safety Executive	Olivier Gardelle	6221	01 274 6221	086 807 6784	Bray
Group Environment Compliance Manager	Malcolm Dowling	7969	01 2947969	086 3887976	Ballyogan
Group Environmental Executive	Suzanne Byrne	7949	01 2947949	086 0433983	Ballyogan
Group Environmental Officer	Garrett Walsh	-	051 333946	086 1705034	Waterford

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Appendix 3: Greenstar Environmental Services Ltd – Limerick Organogram

Please Refer to IF-06C – Greenstar Environmental Services Ltd – Limerick Organogram

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IP-15 EMERGENCY RESPONSE PROCEDURE

1. PURPOSE

The purpose of this document is to describe the steps to be followed in the event of an emergency and to:

- Ensure the safety of site personnel, visitors and neighbours,
- Minimise the risk of environmental damage,
- Ensure that all accidents, incidents, dangerous occurrences and near misses are reported, investigated and documented in a timely manner, and are managed in compliance with statutory and company requirements.

2. SCOPE

This procedure applies to all Greenstar Limited activities as listed in the scope of certification.

3. RESPONSIBILITY

- **Senior Management** are responsible for overseeing the implementation of this procedure and facilitating the necessary measures to deal with an emergency in compliance with the Greenstar Limited EHS Policy.
- The **Facility Manager** is responsible for ensuring that:
 - This procedure is implemented and maintained;
 - All documents are available where required and reflect current site practice and requirements,
 - Site employees understand:
 - their responsibilities in the event of an emergency, are competent and receive appropriate training,
 - the documentation and records requirements.
 - Appropriate emergency equipment is readily available, serviced and usable,
 - All accidents and incidents are logged on the WIMS database as a Non Conformance Incident Report raised - SF-21 and the matter reported verbally to the appropriate EHS Staff immediately or as soon as is reasonably practical after the incident,
 - All accidents, incidents, dangerous occurrences and near misses are investigated, documented accordingly.
- The **EHS Executives** are responsible for ensuring that all accidents, incidents, dangerous occurrences and near misses are investigated, reported to the relevant authority as deemed necessary and corrective/preventive action initiated accordingly. They are also responsible for maintenance of the site Specific Emergency Response Plans in consultation with the Facility Manager.
- The **Fire Warden** is responsible for duties defined in the Emergency Response Plan and assisting with the implementation of this procedure
- The **First Aiders** are responsible for duties defined in the Emergency Response Plan and the administration of First Aid as required.
- All **Site Personnel** must adhere to the requirements defined in the Emergency Response Plan and the requirements of this procedure.

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4. REFERENCES

Documents

- Group Safety Statement
- Site Emergency Response Plan (ERP)
- Environmental Aspects & Impacts (*Scannell Solutions Software/IF-03A*)
- Health & Safety Risk Assessments (*Scannell Solutions Software*)
- Staff Training Records - TMS
- IP-10 Non Conformances Corrective Preventive Actions Procedure
- IP-07 Communication & Consultation Procedure
- EP-03 Environment Communications Procedure

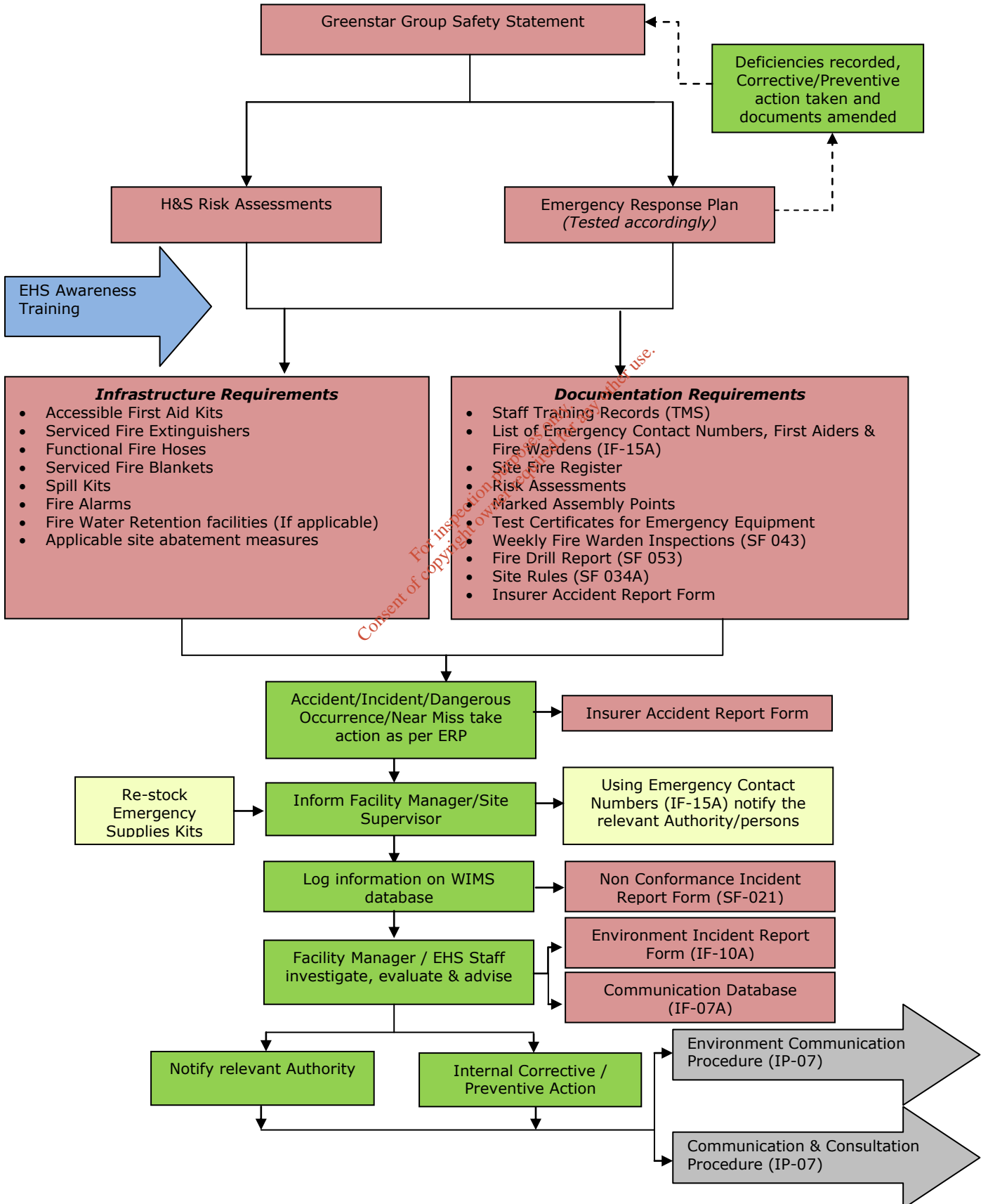
Forms

- Site Fire Register
- SF-053 Fire Drill Report
- SF-043 Weekly Fire Warden Inspections
- IF-15A Emergency Contact list
- SF-034 Site Rules
- SF-021 Non conformance, Incident Report Form
- Insurer Accident Report Form
- WIMS database
- IF-07A Communication Database
- IF-10A Environment Incident Report Form

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5. PROCEDURE



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IP-XX FIRE PREVENTION PROCEDURE

PURPOSE

The purpose of this document is to describe the steps to be followed to:

- Minimise the risk of Fire
- Ensure earliest possible detection of the outbreak of fire
- Ensure earliest possible response in the event of fire
- Ensure in so far as is reasonably practicable first aid fire fighting equipment is in place.
- Ensure emergency evacuation procedure in place to safeguard the safety of site personnel, visitors and neighbours.

1. SCOPE

This procedure applies to all Greenstar sites as activities as listed in the scope of certification.

2. RESPONSIBILITY

- **Senior Management** are responsible for overseeing the implementation of this procedure and for ensuring that the necessary measures are in place to minimise the risk of fire across all sites in line with this policy and site specific Emergency Response Plans.
- The **Facility Manager** is responsible for ensuring that:
 - This procedure is implemented and maintained,
 - All documents are available where required and reflect current site practice and requirements,
 - Site employees understand:
 - their responsibilities in relation to minimising fire risk, are competent to respond to a fire emergency on site and have received appropriate training in first aid fire fighting and emergency evacuation,
 - Appropriate emergency equipment is readily available, serviced and usable,
 - All accidents and incidents are logged on the WIMS database and Non Conformance Incident Report raised - SF-21 and the matter reported verbally to the appropriate EHS Staff immediately or as soon as is reasonably practical after the incident,
 - All accidents, incidents, dangerous occurrences and near misses are investigated, documented accordingly.
- The site **Fire Marshal and Fire Wardens** are responsible for duties defined in the site Emergency Response Plan and assisting with the implementation of this procedure.
- All **Site Personnel** must adhere to the requirements defined in the Emergency Response Plan and the requirements of this procedure.
- The **EHS Executives** are responsible for ensuring that all accidents, incidents, dangerous occurrences and near misses are investigated, reported to the relevant authority as deemed necessary and corrective/preventive action initiated accordingly. They are also responsible for maintenance of the site Specific Emergency Response Plans in consultation with the Facility Manager.

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3. REFERENCES

Documents

- Group Safety Statement
- Site Emergency Response Plan (ERP)
- Environmental Aspects & Impacts (*Scannell Solutions Software/IF-03A*)
- Health & Safety Risk Assessments (*Scannell Solutions Software*)
- Staff Training Records - TMS
- IP-10 Non Conformances Corrective Preventive Actions Procedure

Forms

- SF-053 Site Fire Register
- SF-043 Fire Drill Report
- IF-15A Weekly Fire Warden Inspections
- SF-034 Emergency Contact list
- SF-021 Site Rules
- IF-07A Non conformance, Incident Report Form
- IF-10A Communication Database
- IF-10A Environment Incident Report Form

5. Fire Prevention

Sources of Ignition

Spontaneous combustion of waste

Ignition sources within the waste

- hot ash,
- chemicals or
- corrosives that might ignite on contact.

Hot works

- cutting
- grinding or
- welding.
-

Electrical or mechanical components overheating

- mobile plant
- electrical panels- hot spots
- portable electrical heaters or blowers.

Smoking

- Employees or third parties not obeying site smoking policy requiring smoking only in designated area.

Arson

- Intruders/trespassers causing a fire.

6. Controlling Sources of Ignition

Waste

- Stockpile kept to a minimum, goal is daily clean floor policy
- two hour fire watch post closing
- loads coming in after closing hours skips to be left in the yard and tipped next morning
- Regular housekeeping and deep clean regime in place to reduce dust concentration and minimise fire spread

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Electrical/Mechanical

- Hot works permit and four hour fire watch.
- Suppression systems on shredders.
- Ensure all mobile plant engine compartments are kept clear of paper, rubbish or other debris.
- Ensure mobile plant parked away from stores materials.
- Suppression systems on all generators that work continuously.
- Generator maintenance to be carried out per manufactures instructions
- Electrical testing of panels to identify “hot spots”.
- Discontinue the use of any portable heaters.
- Insure electrical panels free of dust and debris and kept closed at all times.
- Electrical switch rooms to be kept clear at all times.
- Maintenance shops to be kept tidy and gas bottles chained up.

Material storage

- Keep processed material storage to a minimum.
- Timely turn around on containers
- Any material stored outside must be stored at least five meters from any building
- Diesel storage tanks above 2000Li. capacity to be of metal construction

Detection Systems

In the event of a fire early detection may prevent fire spread and possibly avoid a major incident

- Physical presence on site 24/7, Employees or security.
- Out of hours security with scheduled patrols and CCTV monitoring.
- Out of hours remote CCTV monitoring
- Early warning smoke or flame detection systems - **TBA**

Emergency Response

- Site specific Emergency Response Plan in place for each site to include;
 - weekly checking of all fire fighting equipment to include fire extinguishers, fire hydrants and fire hoses
 - ensure any extinguishers that are spent are refilled or replaced
 - fixed water monitor where possible hot spots might exist
 - annual checking and maintenance of all fire fighting equipment as required by legislation to include pressure testing of hydrants
 - six monthly fire drills with response times recorded
 - trained fire wardens in place on all sites
 - trained first aid fire fighting teams on site where practical
 - emergency pack, to contain site drawings indicating fire hydrants, hazardous material (diesel oil etc.) in place in weighbridge for emergency services
 - liaise with local fire officer in relation to possible hazards on site that could be a risk to fire crews.