

# APPENDIX

# Environmental Management Review 2020

Management Review of the Authority's Environmental  
Management System and Performance

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## **1. Introduction**

### **1.1 The Purpose of this Report**

This report supports the quarterly environmental briefings documenting the authority's ongoing operational performance and related issues and has three main purposes. Firstly, it is intended to provide senior management with information regarding the authority's environmental risks, along with associated mitigating actions and opportunities. Secondly, it provides a platform for discussion/approval of relevant policies, objectives and procedures. Finally, it includes a review of WCC's environmental operational performance over the financial year 2019-2020 with comparative data where available.

### **1.2 Synergies with expected Warwickshire Behaviours**

WCC has been certified to the international standard ISO 14001 since 2008. The scope of the certification is '***The services and activities delivered by Warwickshire County Council in relation to the built and natural resources of Warwickshire delivered directly or by wholly owned companies***'. This scope covers all areas of the organisation, including wholly owned companies but has a greater influence/impact where there is higher environmental risk. With regards to schools it includes the services that WCC delivers in schools either directly or under subscription.

The ethos of the ISO 14001:2015 standard is continual improvement – which aligns with expected Warwickshire behaviours including '*Making Warwickshire the best it can be*'

# **Part One**

## **Strategic Environmental Issues**

### **2.0 Strategic Environmental Risk**

#### **2.1 Management of Strategic Environmental Risk**

Environmental risks for WCC at a strategic level were determined in 2017 using environmental risk registers and discussion with senior management. These have been reviewed in subsequent years. It is considered that the main strategic risks that could affect the environment of Warwickshire as a whole or the services that WCC provides are:-

- Climate change, including the increased likelihood of severe weather events
- Increased development (business and residential) impacting on infrastructure
- Construction of HS2
- Expected increases in municipal waste
- Continued need for financial savings that may impact on services

The impact of Covid 19 has been considered from an environmental perspective and whilst its devastating impact primarily affects health and social care it also poses a significant environmental risk. The main environmental risks associated with the impact of the virus (or indeed any similar pandemic) are:-

- The potential financial impact on all services, including those of an environmental nature;
- The increase in unrecyclable waste (face masks) and an increase in the likelihood of fly-tipping;
- The increase in carbon emissions from people working from home in the winter and adopting single vehicle travel; and
- The potential decrease in the perceived importance of climate change due to immediate need to focus on tackling the virus.

A full account is documented in EMS procedure EMP 04 along with associated mitigation controls and opportunities for improvement– **Refer to Appendix A**

Our external EMS assessment body (currently the British Standards Institution) has rated WCC as having a **medium** environmental risk.<sup>1</sup>

### **3.0 – Review of the Environmental Management Policy and Associated Objectives**

#### **3.1 Environmental Management Policy**

The current Environmental Management Policy, which includes key environmental commitments for the organisation, was originally approved by Cabinet in April 2015. The organisation has undergone various changes since this time – in particular with regards to the organisational structure – and the policy has

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<sup>1</sup> BSI Report No 8005632 09-07-14

undergone minor revisions to capture this. The policy's environmental commitments are wide-ranging and currently remain suitable given the context of the organisation and the scope of the EMS.

1. Comply with environmental legislation and other environmental compliance obligations
2. Identify and manage the authority's significant environmental risks and identify controls needed to reduce impacts to an acceptable level, including progressing potential opportunities for improvement where feasible.
3. Make best use of natural resources, including energy, paper and equipment, including consideration of life-cycle philosophy at the procurement stage.
4. Manage wastes in line with the Waste Hierarchy – 'Prevent/Reduce, Prepare for re-use, Recycle, Recover Dispose (correctly)
5. Safeguard the natural environment of Warwickshire within the authority's control – including adapting to and mitigating the impacts of climate change, preventing pollution and protecting biodiversity and ecosystems
6. Ensure the effective management of the authority's built and natural estate
7. Maintain resilience regarding environmental threats to the organisation, its services and wider Warwickshire where the authority has control or influence
8. Ensure that WCC staff have the necessary skills, competence and awareness regarding environmental aspects of their roles
9. Through the above actions to achieve continual improvement of the Authority's environmental performance

### 3.2 Environmental Objectives

The objectives and associated targets for the EMS have mostly been formulated from the actions on climate change documented in the Council Plan 2025. Robust realistic targets are being determined with relevant managers.

#### *Built and Natural Environment*

- We will seek to achieve net gain for habitat, benefiting climate change mitigation and adaptation
- We will seek to prevent the degradation of our natural estate and enhance where opportunities arise

#### *Energy and Water Use*

- We will reduce our energy consumption by improving the energy efficiency of our buildings and make our corporate buildings carbon neutral.
- We will substantially increase our renewable energy generation, continue to purchase 100% green electricity and support residents to procure cheaper energy

#### *Policy, Legislation, Risk and Opportunity*

- We will maintain certification to ISO 14001:2015 for all services

### Procurement and Contract Management

- We will develop our plans to reduce carbon emissions from our third-party contracts for highways, property and social services
- We will reduce the significant adverse environmental impacts from higher cost procurements contracts where feasible

### Skills, Awareness, Training and Communication

- We will ensure our staff, contractors, customers and visitors are clear how they contribute to minimising the Council's carbon impact.
- We will employ staff with the necessary skills and competence to manage the environmental impacts of their work and provide training for environmental aspects of their work as required.

### Travel and Transport

- We will seek to make the Council's transport fleet carbon neutral.
- We will embrace new ways of working to reduce both business travel and Commuting
- We will support and encourage low carbon and carbon neutral methods of travel for staff
- We will review and agree a new local transport plan to encourage sustainable travel and reduce transport related carbon emissions

### Waste and Recycling

- We will reduce, recycle and compost more of our office waste, and reduce our use of paper and single use plastic.
- We will develop and implement a new joint waste strategy for Warwickshire working in partnership with the district and borough councils to reduce, reuse, recycle and compost and recover more of our household waste

### Working in Partnership

- We will partner with our communities to plant a tree for every Warwickshire resident.
- We will work with local businesses and communities to help them reduce their carbon emissions and become more sustainable.

Suitable targets will to be drawn up with Senior Management

## **4.0 Key Changes to Environmental Legislation /Compliance Obligations**

### 4.1 Environmental Legislation

#### April 2019 - 2020

April 2019 – EU votes to ban single use plastic

May 2019 - MPs approved a motion to declare a climate emergency in Parliament

July 2019 – Net zero greenhouse gas emissions targets in force for the UK

July 2019 – Consultation on electric vehicles smart charging launched

July 2019 – Consultation on carbon offsetting in transport launched

October 2019 – New Environment Bill published

March 2020 – Consultation for Contracts for Difference launched

March 2020 – European Climate Change law proposed by European Parliament

March 2020 - Draft legislation on single use plastic published

March 2020 – Consultation on Plastic Packaging tax

### Looking Ahead

June 2020 – Consultation on Climate Change Agreements scheme extension and reforms for any future scheme;

August 2020 – New planning system proposed

August 2020 - Consultation on deforestation due diligence in UK supply chain

October 2020 – Environmental Protection (Plastic Straws, Cotton Buds and Stirrers (England Regulations coming into force

## **5.0 Challenges, Opportunities and Key Achievements**

### **5.1 – Examples of key achievements**

Opportunities for environmental improvement may be identified and progressed via various means including outcomes of risk assessments and results of audits. At a strategic level most environmental improvements are endorsed / approved by Elected Members. Some of the key works undertaken by WCC April 2019 – March 2020 which have a positive environmental impact are noted below:

- June 2019 - Continued roll-out of BDUK Broadband throughout Warwickshire with the aim of reaching 98% of businesses and households. (Continued digital connectivity helps to reduce travel and use of paper).
- June 2019 - Continued success of Warwickshire Switch and Save campaign helping residents to switch to cheaper energy solutions with 100% green electricity.
- June 2019 - Municipal Waste Management Strategy with the aim of reducing residents (Non HWRC) waste to 311kg per household and achieve 65% for re-use, recycling and composting.
- Consultation on the Draft Rail Strategy 2019-2034 demonstrating continued support for sustainable travel options.
- July 2019 – Agreement for property level flood resilience measures in Grendon
- July 2019 – Climate Emergency declared and a Climate Change Task and Finish Group formed
- September 2019 – Noted continued digital and virtual services delivered by Warwickshire Library Service including e-books and Let's Make Spaces.
- October 2019 – WCC Commercial Strategy approved at Cabinet supporting carbon reduction and improved delivery of environmental and social priorities.
- November 2019 – Capital investment for the reformation of Nuneaton Town Centre approved.
- November 2019 – Approval of WCC's Reduction of Single Use Plastic strategy for internal WCC services.

- November – Introduction of a required Environmental Implications section added to Reports for Cabinet, County Council and Corporate Board.
- December 2019 – Allocation of finance approved for Leamington to Kenilworth Cycle Scheme.
- January 2020 – Pailton Property Flood Resilience Scheme approved.
- January 2020 – Council Plan 2025 approved including several objectives relating to climate change.
- February 2020 Shire Hall and County Hall Museum signed up as water refill stations to support the reduction in single use plastic.
- March 2020 – Property Management Strategy approved

## **5.2 - Improvements being progressed 2020/2021 include:-**

- Management – continued certification to the international environmental management standard ISO 14001:2015;
- Management - Continued review of environmental risks and opportunities throughout WCC services;
- Policy - Generate a revised environmental objectives and suitable targets that reflect the Council Plan 2025 and WCC's Future Operating Model;
- Climate Change – contributing to the work of related Task and Finish groups;
- Communication – progressing a staff network of environmental 'champions' to help reduce adverse environmental impacts related to their area of work/building;
- Energy – Supporting the progression of reduction in energy and renewable energy on WCC estate;
- Paper – Reducing paper use throughout WCC services;
- Training – Generating a suite of e-learning modules to include a new module regarding climate change;
- Waste – Building back better – introducing better recycling points as part of reinstatement works within WCC buildings;
- Waste - Reducing residual waste associated with WCC services, including the introduction of a food collection service for larger buildings; and
- Procurement – Embedding sustainable options into procurement policy and processes



## Part Two

### Operational Performance

#### 6.0 – Environmental Objectives – Summary of Performance 2019-2020

Item	Section	Performance Measure	Comment for 2019-2020
(Obs 1) Compliance	(6.1)	Zero prosecutions or adverse publicity	Zero prosecutions or adverse publicity.
(Obs 2) Waste	(6.2)	5% reduction year on year	Could not be calculated due to poor data for previous year. Robust data now being received
(Obs 3) Energy (Electricity & gas)	(6.3) (6.4)	2.5% reduction in CO2 emissions from energy use year on year	6.42% straight reduction 8% reduction based on GRE
(Obs 3) Water	(6.5)	-	NA - Most invoices are estimated
(Obs 4) Travel	(6.6)	2.5% reduction in business mileage (grey fleet) year on year	7.56% decrease – and a 39.72 reduction over 7 years.
(Obs 4) Travel	(6.6)	2.5% reduction in fuel (white fleet) year on year	2.74% decrease for 2019/2020 – and 26.60% decrease since baseline year
(Obs 5) Paper	(6.7)	5% reduction in paper used	17.69 % reduction for B&W 6.46 % decrease for colour 15.93 % decrease in quantity of sheets used
(Obs 6) Commercial Opportunities & Training	(6.8)	Waste Smart course 4 delivered p.a.	4 courses offered - 1 carried out with 6 delegates successfully passing the course
(Obs 7) Environmental Protection	(6.9)	Zero prosecutions or adverse publicity	Zero prosecutions or adverse publicity
(Obs 7) Environmental Protection	(6.9)	50% reduction in greenhouse gas emissions from corporate estate per GRE by 2020 compared to baseline year 2013	52.43% decrease since baseline year (2013)
(Obs 8) EMS	(6.10)	Transition to ISO 14001:2015 by Jan 2018	(Complete Aug 2017)
(Obs 8) EMS	(6.10)	Minimum 42 internal audit p.a.	47 completed

Invoices for water are largely based on estimates. It was hoped that, following deregulation of the water authorities, more accurate data would be forthcoming – however this has not been realised. A more robust and accurate way to track usage needs to be determined.

## 6.1 Compliance Checks

There have been no prosecutions or adverse environmental publicity regarding WCC environmental service or operations during the financial year 2019 - 2020.

Results of compliance checks (legal requirements) undertaken as part of the internal audit programme 2019-2020:-

Status	Number of compliance obligation checked						
	Year	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Not compliant with several parts		23	21	26	19	26	29
Some omissions/partially compliant		7	9	11	16	17	15
Compliant		87	57	54	84	77	56

The main areas of complete or partial compliance relate to the following areas:-

- Waste containment and contamination – hazardous waste storage and contaminated recycling
- Waste documentation – incorrect or not available
- Water hygiene issues – anomalies regarding checks carried out and contractor issues

A more detailed analysis is shown in Appendix B

## 6.2 - Waste and Recycling

WCC operates a recycling service in all centralised properties for staff to recycle glass, paper, card, cans, tins and plastics. This reduces the amount of waste that can end up in landfill as well as reducing associated disposal costs. A breakdown is shown in the table below along with the residual weight for the last financial year :-

Year	2015-16 Tonnes	2016-17 Tonnes	2017-18 Tonnes	2018/19 Tonnes	2019-20 Tonnes
Recycling	97.568	92.597	84.978	77.452	142.976
Residual	Data NA	Data NA	Data NA	Data NA	209.641

- This year we generated a total of **352.617 Tonnes** of waste within our centralised buildings. 40.55% of all the waste that we generated was recycled – which is a little below the UK average.
- At first glance it appears from the figures above that we have almost doubled the amount of waste that is recycled! Unfortunately this is not the case due to the inaccuracy of the data that we received in previous years. We should use year 2019-2020 as a baseline to measure and monitor our performance in future years.
- It should be noted that the figures above only relate to centralised properties so sites such as Business Centres and Country Parks are not included. It also does not include any waste generated by contractors carrying out works within our buildings or on our estate.
- The ability to compost food waste (currently offered in central Warwick buildings) has been compromised by the quality of the compost produced and a genuine cost effective beneficial use in line with the waste exemption that applies to this process (U11 – Beneficial use of waste). We are exploring setting up a suitable food collection scheme for all our larger buildings whereby waste food can be collected and sent to an anaerobic digester to generate energy as well as compost.

- We are moving towards a different type of recycling scheme consisting of the following waste streams:-
  - Dry mixed recycling (Plastics, Paper, Card, Tins, Cans)
  - Glass
  - Residual waste (not recycled by our corporate waste contractor)
  - Food waste
- The table below shows a break-down of waste collected from centralised property by service area. Further work to support the reduction of waste generated by service area is planned over the next 12 months.

Waste	Residual Tonnes	Recycled Tonnes	Total Tonnes
CFM	10.682	0	10.682
Fire	38.679	18.853	57.532
Guardians	9.089	1.646	10.735
Highways	3.09	2.153	5.243
Libraries	17.338	7.972	25.31
Museums	2.325	1.862	4.187
Not Direct WCC	9.115	1.588	10.703
Offices	118.29	53.783	172.073
Sports	0.027	0.319	0.346
Transport Depots	1.006	0	1.006
<b>Totals</b>	<b>209.641</b>	<b>142.976</b>	<b>352.617</b>

### **6.3 Energy Use - Buildings**

#### **Building Consumption 2019 - 2020**

Comprehensive information regarding the energy used within our buildings has been compiled by the Energy Team and is contained within the Annual Building Energy Consumption and Emissions Review.

- kWh for all WCC corporate properties is shown in the chart below

Year	2015/16 (kWh)	2016/17 (kWh)	2017/18 (kWh)	2018/19 (kWh)	2019/20 (kWh)
kWh	18,021,835	18,162,905	18,418,393	18,499,594	18,643,473

The number of buildings covered by this data has risen from 94 to 100 over the last 5 years. Analysis of the findings at a specific building level will help form further investigation requirements, audit criteria and potential energy saving improvements.

## Renewable Energy Generated 2019-2020

The table below shows the amount of solar (PV) energy produced from WCC estate 2019/2020

<b>WCC Renewable Energy Generation: April 2019 - March 2020</b>	
<b>Site Name</b>	<b>Generation (kWh)</b>
Barrack Street	40,239
Bilton Infant School	19,585
Camperdown Farm	11,803
Carpenters Farm	6,058
Lower House Farm - Building 1 (New Office)	9,453
Lower House Farm - Waste Building (Old, Supplying Office Building 1)	4,556
Lower House Farm - Building 2 (New Shop)	3,212
Lower House Farm - Building 3 (New Biffa Building)	15,411
Old House Farm	8,263
Poplars Farm	25,309
Saltisford Building 1	15,617
Saltisford Building 2	40,714
Sir Frank Whittle Business Centre	13,209
Northgate House	206
<b>TOTAL</b>	<b>213,635</b>

All our purchased electricity is now generated from totally renewable sources (e.g. solar, wave and wind power)

### **6.4 - Energy Use - Street Lighting<sup>2</sup>**

Street lighting accounted for approximately 10.14 million kWh of electricity in year 2019-2020 at a cost of over £1.6 million. This represents a decrease in energy usage of 4.98% (despite taking on an additional 250 street lights) with a small increase in cost of 2.37%. -

- Continued replacement of sodium lamps with LED<sup>3</sup> lamps as older lamps reach end of life or breakdown is ongoing. LED lamps require less maintenance which reduces cost and reduce associated carbon emissions..
- LED lighting is specified for all new housing estates.

Currently LED lamps account for 82% of WCC's street lighting stock an increase of 9% compared to the previous year.

<u>Year</u>	<u>kWh</u>	<u>Cost (£)</u>
2013/14	<b>19,778,192</b>	<b>£2,090,763.30</b>
2014/15	<b>19,066,391</b>	<b>£2,173,373.58</b>
2015/16	<b>16,959,911</b>	<b>£1,974,674.76</b>
2016/17	<b>14,323,507</b>	<b>£1,774,446.59</b>
2017/18	<b>12,439,496</b>	<b>£1,691,435.26</b>
2018/19	<b>10,671,513</b>	<b>£1,566,118.89</b>
2019/20	<b>10,139,107</b>	<b>£1,604,156.84</b>

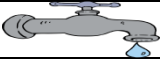
<sup>2</sup> Information provided by WCC Street Lighting Team

<sup>3</sup> Low Emission Diode

## 6.5 - Water

Unfortunately we do not have accurate data regarding the actual amount of water that we have consumed within our estate. NB There is no charge for water used for training by Warwickshire Fire and Rescue Service

In the absence of data please find below the amounts paid for water use over the last 4 financial years (centralised properties only)

 Cost*	Cost*
2015-2016	£188,199
2016-2017	£132,343
2017-2018	£159,042
2018-2019	£224,478
2019-2020	£214,000

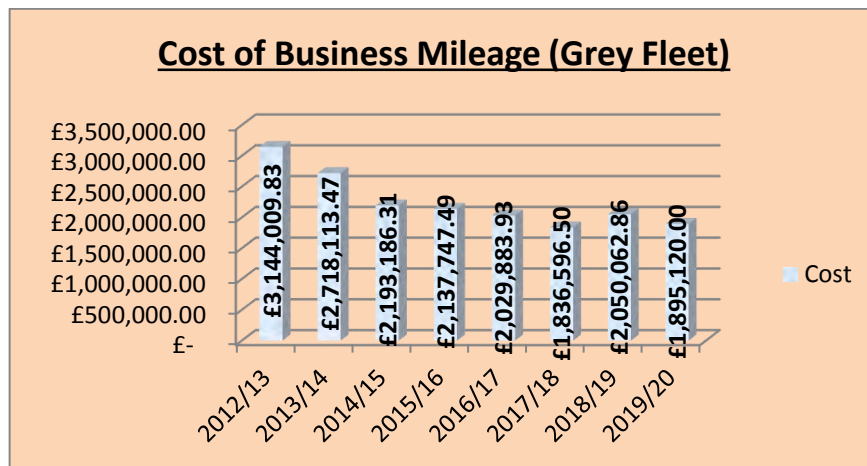
\*Costs are approximate as some invoices are not paid in the relevant financial year.

## 6.6 - Travel

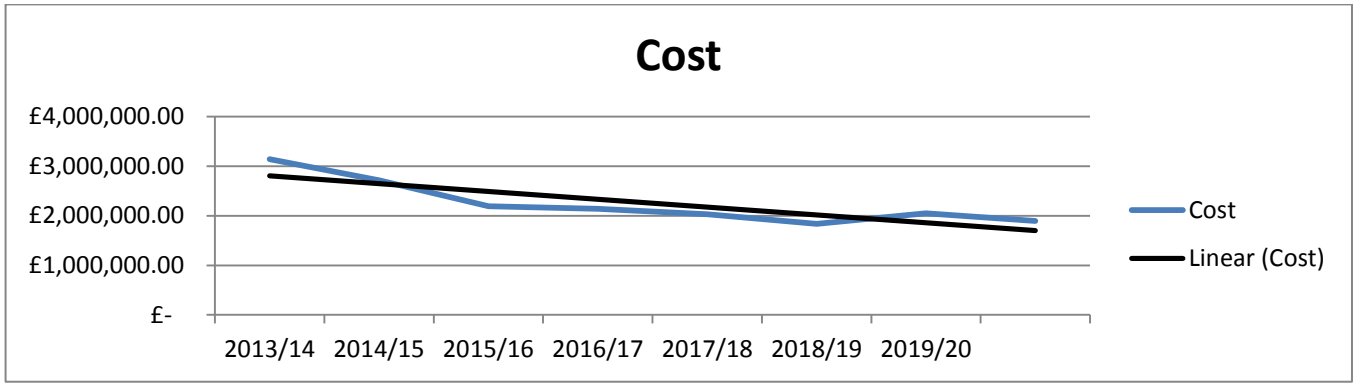
Grey Fleet (Business mileage/personal vehicles)

The data for business travel has been taken from HRMS travel expense claims and is shown as cost.

Total **cost** for all WCC business mileage claims 2019/2020 was **£1,895,120** representing a 7.56% **decrease** compared to 2018/2019. It should also be noted that the price of fuel (petrol) increased by 1.06p per litre over the 12 month period<sup>4</sup> – which makes this decrease more significant.



<sup>4</sup> Statistics from BEIS



Directorate	Cost	Trend
Communities	£504,502.16	down
People	£1,181,620.72	down
Resources	£204,966.69	down
Members / Corporate. Board	not measured in previous years	

A rough calculation of **carbon emissions** using average emission data for petrol (the mostly used grey fleet fuel) <sup>5</sup> shows that business mileage resulted in a total of 3,322.27 Tonnes of CO<sub>2</sub>(e). This comprised

- Carbon Dioxide - CO<sub>2</sub> - 3.302.44 tonnes
- Methane CH<sub>4</sub> – 10.34 tonnes
- Nitrogen Dioxide – NO<sub>2</sub> – 9.49 tonnes

#### Likley Future Trends

The impact of Covid 19 has given us the opportunity to demonstrate that it is possible to conduct at least some of our services remotely. It is likely that we will continue to see a decrease in grey fleet business mileage over the next few years as long as we continue to make good use of technology and digital modes of service delivery.

<sup>5</sup> Data from UK conversion factors 2019 BEIS

## White Fleet (Operational Vehicles)

The amount of fuel purchased for white fleet vehicles in year 2019-2020 was 457,737 litres– a breakdown is shown in the table below:-

	<b><u>Petrol (Litres)</u></b>	<b><u>Petrol (Tonnes CO2(e))</u></b>	<b><u>Diesel (Litres)</u></b>	<b><u>Diesel (Tonnes CO2(e))</u></b>	
2013-2014	10,322	23	588,818	1531	Including 80,061 litres of bulk diesel for fire stations
2014-2015	14,992	33	521,987	1363	Including 83,353 litres of bulk diesel for fire stations
2015-2016	12,274	27	492,563	1247	Including 91,137 litres of bulk for fire stations
2016-2017	9,015.83	19.807	307,671.98	803.525	Including 102,329 litres of bulk diesel for fire stations
2017-2018	10,946.62	24.06	455,075.9	1183.27	Including 100,357 litres of bulk diesel for fire stations
2018-2019	15,993.47	35.23	454,639.13	1194.31	Including 111, 763.66 litres of bulk diesel for fire stations
2019-2020	15,382	33.98	442,355	1147.52	Including 117,039 litres of bulk diesel for fire stations

NB The figures exclude fuel used by Highways Contractors





2019/20 combined fuel purchases have decreased slightly by 12.895 litres compared to 2018/19 (a 2.74 % decrease). The trend is still downward (23.60%) compared to the baseline year of 2013/2014.

NB conversion factors for both diesel and petrol are very similar to the previous year.

## 6.7 - Printing and Paper Use

Data shown in the table below is obtained from Canon Uniflow information reports.

As at March 2020 there are 149 MFDs installed throughout our corporate buildings 110 of which have the capability to print in colour. The figures below exclude printing on desk-top devices.

Printing Information <sup>6</sup>		
No of black & white pages	12,019,713	17.69% decrease from previous year
No of colour pages	2,781,296	6.46% decrease from previous year
Total No <b>sheets</b> (not pages)	10,029,976	15.93% decrease from previous year
Cost	£168,030	10.44% decrease from previous year
Environmental cost : The following items were used in the manufacturing process for the paper used by WCC staff		
 1189 trees	 2,401,444.5 litres of waste water	
 87,142.75 kg of greenhouse gases	 28,966 kg of solid waste	

N.B. Costs are for printing only **NOT** paper

As shown above, there has been an excellent decrease in the amount of printing for both black and white and colour copies along with the number of sheets of paper used.

Follow-me printing has been implemented throughout the majority of WCC buildings with settings generally set to duplex, black and white and scanning encouraged for electronic storage of documents

The amount of paper recycled suggests that there is scope to reduce the amount of paper used.

These figures are of course pre-Covid 19 – thus the decreases and environmental improvement are a true comparison with the previous year. Given the amount of people working from home now – and likely in the future – next year's figures will be interesting! We cannot really take into account any printing undertaken at home, but the change in behaviour due to staff adapting to new working practices and better use of technology mean that we can forecast a substantial reduction for future years.

<sup>6</sup> Data supplied by Canon – printing intelligence reports



## **6.8 – Training**

The following environmental training was carried out over the 2019-2020 year:-

- The Waste Smart course (accredited by the Chartered Institution of Waste Management) – 1 session delivered with 6 out of 6 delegates passing the required test. The course is now advertised on the CIWM training website.
- Environmental training has continued to be delivered to School Caretakers as part of the Corporate Facilities Service to Schools.
- Spill response training was delivered to a number of CFM, Trading Standards and Waste Management staff

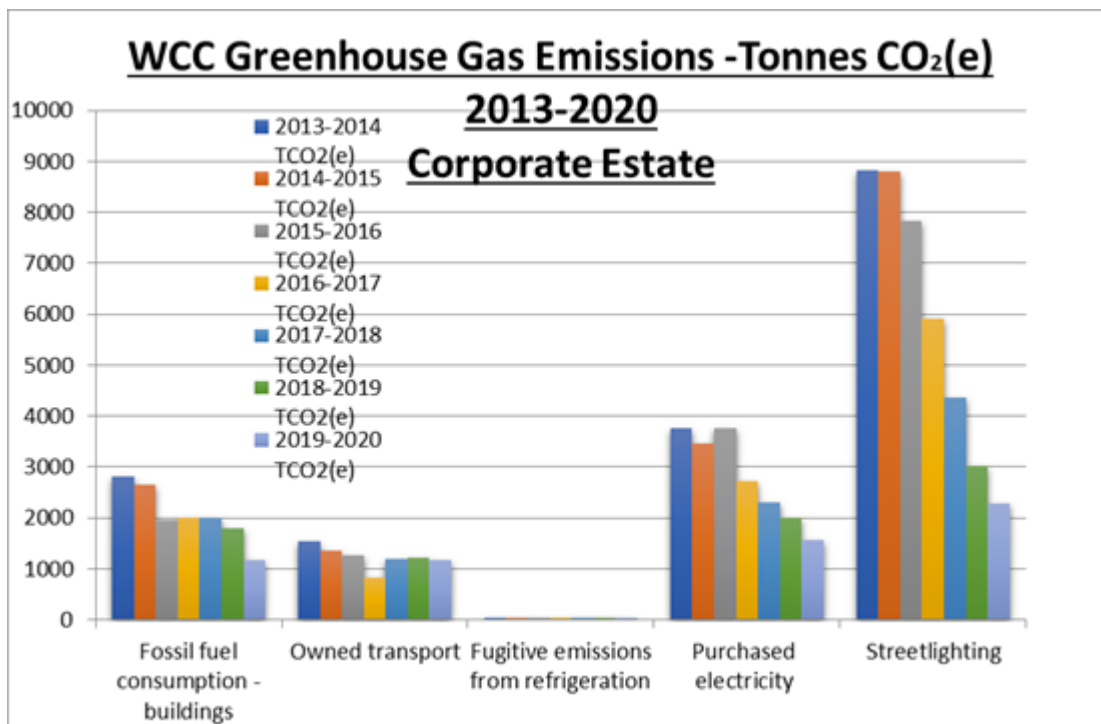
## **6.9 - Environmental Protection - Greenhouse Gas Emissions**

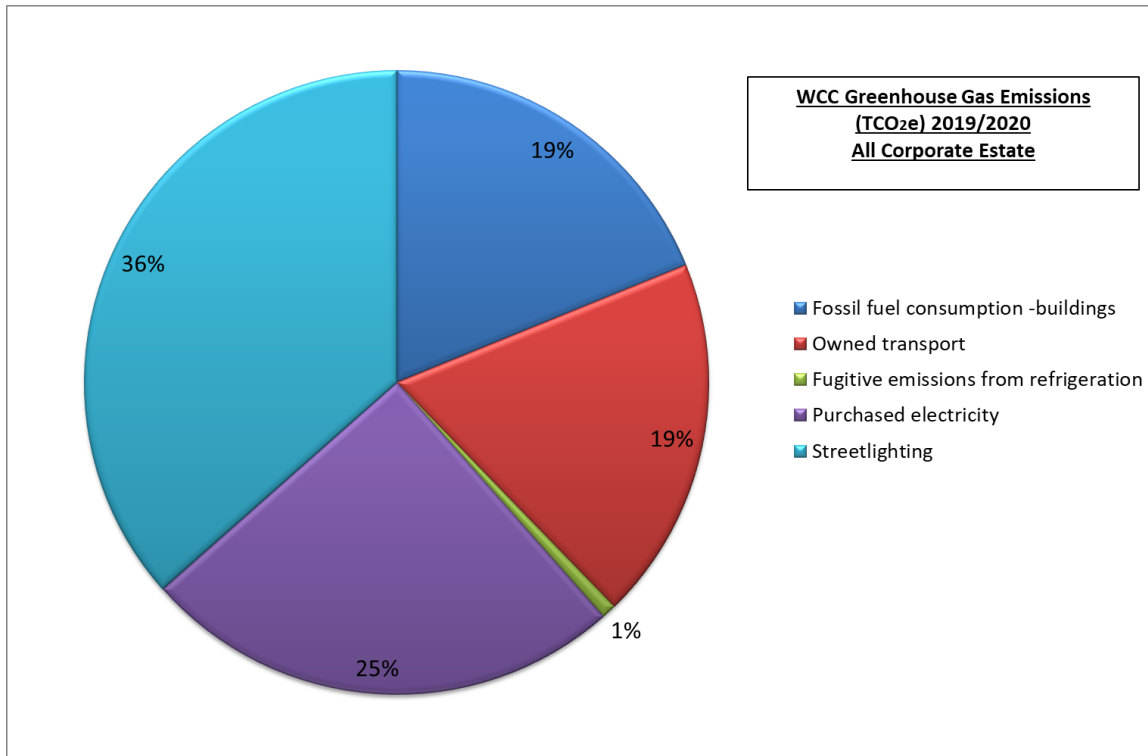
Total GHG emissions from corporate estate 2019-2020 was 6,263.28Tonnes of CO<sub>2</sub>(e) equating to 11.38kg per £1,000 Gross Revenue Expenditure. This represents a 22.57% decrease compared to the previous year.

Overall emissions have decreased by 63.17% since the baseline year of 2013 – this is due to a mixture of more efficient vehicles, utilisation of our building management system and improvements to street lighting technology.

It should also be noted that the increase in renewables in the generation of electricity throughout the UK also has a beneficial effect reducing emissions.

### **Greenhouse gas emissions from WCC Corporate Estate**





## **6.10 - Environmental Audit Results**

47 internal environmental audits were carried out during April 2019 – March 2020, including several targeted specifically at internal waste management and compliance with legislation. In all a total of 47 nonconformities were raised from auditing, but a further 6 were raised outside of the internal audit process bringing the total to 53. One was raised by our external assessment body and 5 were raised and processed through the system following concerns noted by colleagues (mainly regarding waste issues).

- A nonconformity represents non-compliance regarding legislation, the ISO 14001 standard, WCC requirements (e.g. policies or procedures), or an actual / potential significant environmental risk.
- An observation represents a weakness that, if not addressed, may lead to non-compliance or associated concern.
- An opportunity for improvement identifies something that, whilst satisfactory, could be improved without significant resources – thus supporting making Warwickshire the best it can be.

A breakdown is shown in Appendix C

The majority of nonconformities and observations are raised via the internal environmental audit process. Reports, including any issues raised, along with suggested actions for resolution, are forwarded to the relevant manager/person for action where required. Timescales for resolution are determined in line with the level of risk to the organisation and the resources required for implementing suitable corrective actions. Follow-up checks are carried out to ensure that the issues identified have been adequately resolved. Our external assessment body (currently BSI) check nonconformities raised during external audits as part of their subsequent assessment.

Failure to resolve nonconformities within a suitable timescale are escalated to the relevant Senior Management for progression.

Details of nonconformities and observations raised are also reported to Corporate Board and Assistant Directors as part of the quarterly environmental briefing.

<b>Internal Audits</b>	<b><u>2015/16</u></b>	<b><u>2016/17</u></b>	<b><u>2017/18</u></b>	<b><u>2018/19</u></b>	<b><u>2019/20</u></b>
No of Audits	42	44	47	49	47
Nonconformities raised	45	54	41	47	47
Observations raised	114	136	113	104	93
Opportunities raised		14*	72	64	79
Nonconformities raised/audit	1.07	1.23	0.89	0.96	1.00
Observations raised/audit	2.71	3.09	2.46	2.12	1.98
Opportunities raised/audit		0.32*	1.57	1.3	1.68

\* First year of recording

The number of nonconformities raised through the internal audit process has remained similar to the previous year. The number of observations has decreased slightly – which is good news. The number of opportunities for improvement has increased and improvement measures implemented from this will help to improve WCC’s environmental performance.

The main areas of concern noted related to water hygiene issues, spill response and waste issues (documentation, storage and segregation). Nonconformities and observations related to waste span many different services and subjects. It would be useful for staff having waste responsibilities to undergo relevant training such as the Waste Smart course run by WCC. General staff may benefit from an e-learning course regarding WCC’s internal recycling scheme to ensure that expected Warwickshire behaviours are understood.

## Appendix A – Strategic Environmental Risks 2020 (additions re Covid 19 highlighted)

Aspect	Risk	Mitigation / Opportunity
<p><b>Increased growth of businesses and housing within Warwickshire</b>  <i>Warwickshire has a thriving business industry with several major organisations (such as JLR) choosing to locate themselves in the county. This development is welcomed (and it provides income via business rates) but it comes with risks that need to be managed.</i></p>	<ol style="list-style-type: none"> <li>1. Air pollution and associated impacts on the health of Warwickshire residents (11 AQMAs are in place)</li> <li>2. Congestion</li> <li>3. Lack of sufficient energy connectivity and security</li> <li>4. Loss of natural habitat and biodiversity</li> <li>5. WCC's limited role in the decision making process</li> <li>6. Building on flood plain</li> </ol>	<ol style="list-style-type: none"> <li>1. Local Transport Plan in place – includes sustainable of transport</li> <li>1. Public Health working groups re air pollution (N.B. Districts and Boroughs are responsible for air quality management areas)</li> <li>1. Electric Vehicle recharging Policy</li> <li>2. Support for Public Transport and cycling</li> <li>3. Local Transport Plan in place – includes a congestion strategy</li> <li>4. CWLEP</li> <li>3. WCC projects for renewable energy</li> <li>3. WCC's Energy Plan</li> <li>4. WCC undertakes ecological assessments as part of the planning process</li> <li>5. WCC is a statutory planning consultee and works with relevant Districts and Boroughs re planning decisions</li> <li>5. WCC is the consenting authority for waste and minerals</li> <li>6. Flood risk strategy in place</li> </ol>
<p><b>HS2</b>  <i>Construction of HS2 which is planned to run through Warwickshire (but not stop within the county) was approved and some planning works have begun.</i></p>	<ol style="list-style-type: none"> <li>1. Loss of habitat and biodiversity</li> <li>2. Impact on Kingsbury Water Park and Pooley Country Park</li> <li>3. Impact on local towns</li> <li>4. Impacts on traffic etc during the construction phase</li> </ol>	<ol style="list-style-type: none"> <li>1. WCC Ecology Team providing expertise</li> <li>1. HS2 Environmental Statement/Impact Assessment</li> <li>1. There will be opportunity for betterment as part of the 'bargaining' process (e.g. HS2 has paid for the new school at Water Orton)</li> <li>2. WCC is consulting with HS2 re compensation</li> <li>3. Water Orton – HS2 has paid for a new secondary school</li> <li>4. Works will include a construction plan</li> <li>4. The A46 link road project will help to relieve traffic associated with HS2 construction</li> </ol>
<p><b>Waste</b>  <i>WCC is the waste disposal authority for Warwickshire</i></p>	<ol style="list-style-type: none"> <li>1. Increase in waste leading to waste being disposed to landfill and associated increased costs</li> </ol>	<ol style="list-style-type: none"> <li>1. Warwickshire Waste Partnership and Waste Strategy in place facilitate reduced waste to landfill</li> <li>1. Nine HWRC in place including charity re-use shops on site</li> <li>1. Projects to reduce waste and increase recycling in place</li> <li>1. Corporate responsibility re Internal Waste Strategy and single use plastic policy</li> </ol>
<p><b>Financial Savings</b>  <i>Continued need to make saving to ensure best value for Warwickshire residents and businesses</i></p>	<ol style="list-style-type: none"> <li>1. Reduction in services impacting adversely on the environment (May include loss of the EMS)</li> <li>2. Reduction in environmentally important WCC Estate such as smallholdings</li> <li>3. Reduction in staff leading to loss of expertise and experience</li> </ol>	<ol style="list-style-type: none"> <li>1. Further embed environmental requirements into existing structures</li> <li>1. Digital by default programme to reduce 'face to face' contact</li> <li>2. Planned via Strategic Asset Management with environmental considerations in place at procurement and disposal</li> <li>3. Apprenticeship programme in place</li> <li>3. Transformation programme in place</li> </ol>
<p><b>Climate Change</b>  <i>WCC has declared a climate change emergency with an ambition to work towards becoming carbon neutral by 2030</i></p>	<ol style="list-style-type: none"> <li>1. Increased risk of severe weather events including flooding, storms and heatwaves</li> <li>2. Increased cost of maintaining WCC estate and highways</li> <li>3. Adverse impact on natural environment and biodiversity</li> </ol>	<ol style="list-style-type: none"> <li>1. CSW Resilience in place, including emergency rest centres</li> <li>1. Flood Risk Strategy in place</li> <li>1. Compass notes relevant information (rest centres, flood risk asset register, grit bins)</li> <li>2. WCC budgets and planning take this into account</li> <li>2. Theme of Cross-Party T&amp;F group</li> </ol>

Climate Change continued...	<ol style="list-style-type: none"> <li>4. Impact on farming and food production</li> <li>5. Continued use of and investment in fossil fuels</li> </ol>	<ol style="list-style-type: none"> <li>3. Green Recovery funding available with partners (e.g. WWT)</li> <li>3. Theme of Cross -Party T&amp;F group</li> <li>4. Well-managed small-holding estate</li> <li>5. Totally green electricity procured</li> <li>5. Investment of pension fund under consideration</li> <li>5. More fuel efficient and electric vehicles being procured</li> </ol>
<b>Pandemic Virus (Covid 19)</b>	<ol style="list-style-type: none"> <li>1. Financial impact on all services including environmental</li> <li>2. Increase in waste and potential fly-tipping</li> <li>3. Increase in carbon emissions from people working from home and adopting single vehicle travel</li> <li>4. Decrease in the perceived importance of climate change due to the immediate need to focus on tackling the virus</li> </ol>	<ol style="list-style-type: none"> <li>1. WCC has a robust financial budget in place</li> <li>1. Potential future savings through unitary authority and sharing of services</li> <li>2. Warwickshire HWRC open with a robust booking system in place</li> <li>2. Warwickshire HWRC accepting trade waste</li> <li>2. Warwickshire Waste Partnership supports excellent kerbside collections with communication highlighted on-line</li> <li>3. Reduction in commuting</li> <li>3. Warwickshire Switch and Save campaign has green electricity</li> <li>4. Cross Party CCE group continues to function and progress actions to reduce climate change</li> <li>4. WCC's actions to tackle the virus are effective in supporting the community and should help to reduce its long-term impact</li> </ol>

**Appendix B - Summary of issues found during compliance checks 2019-2020**

Details	Status
Spill kits at Lower House Farm HWRC contaminated with waste	Staff and NW Staff informed - checks undertaken - all OK
Lack of Quarterly Water Hygiene monitoring and no W.E.T Service Contract in place at Lower House Farm HWRC	Contract raised and implemented
Low water temperatures at Cherry Orchard HWRC not investigated	Works added to schedule
The Old Coffee Tavern is placing used oil in 58 Yard in contravention of legal agreement	Resolved as per C. Jones
Water Hygiene - Site thermometer not checked at Hunters Lane HWRC	New process now in place
Waste deposited outside site boundary at Hunters Lane HWRC (Age UK)	Waste removed
Waste Documentation not available at Kingsbury Water Park	Waste notes now available
Corroded unbanded oil barrel at Kingsbury Water Park	Moved indoors
Waste of a hazardous nature have been 'dumped' in the wood yard at Kingsbury Water Park. These appear to have originated from the Echill's miniature railway.	Waste removed and correctly consigned
Drainage from toilets etc is via a effluent plant for which a discharge consent for sewage effluent is in place (ref permit No T/16/09170/S). This contains several conditions - There is no evidence that these parameters have been checked for compliance recently	Annual testing instigated
Asbestos (AIB panels) has been removed from the kitchen at Telford School by ICS however no hazardous waste consignment note was available on site. (Neither has a copy been forwarded to the Project Manager or Property Risk Team)	Requirements re-enforced to contractors and consignment note now available
A deep lift well is located in the yard and used for training purposes. This should be included in the Water Hygiene L8 Control of Legionella checks – records show that this is not the case	Still open Property Risk Manager informed
Coffee Tavern have left unprotected waste cooking oil out side their door next to a drain	Waste removed as per C. Jones
WCC has not been able to obtain access to Biffa's electronic waste transfer note system and therefore cannot demonstrate that the organisation complies with the Waste Regulations	Annual Waste Transfer notes now available
Caretakers reported Food and nonrecyclables in paper recycling in Village S5 (legal Services)	Requirements re-enforced to staff by Service Manager
Inspection not carried out at Stockton HWRC not carried out an inspection for approx 18 months (daily checks are being carried out)	Inspections re -instated
Waste documentation was not up to date at Stockton HWRC	Running of site now under WCC control - documentation available
Water Hygiene tests not being undertaken at Stockton HWRC	Running of site now under WCC control - checks undertaken
Fire alarm testing has not been carried out at Stockton HWRC	Running of site now under WCC control - tests undertaken
Oily Rags Container within the Appliance Bay is mixed with General and Recycling Waste at Stratford Fire Station	Process for collection of oily waste now in place
Details	Status
Bleach used on site – no CoSSH Sheet available at Stratford Fire Station	Use discontinued
Several Cans of Paints stored in Cleaner's Cupboard at Stratford Fire Station	Removed and treat as hazardous waste

<b>Appendix B continued</b>	
Details	Status
Valid signed waste notes for general waste, recycling and sanitary waste not available for Stratford HWRC	Ensure that WTNs are available
A half full bag of multibed concrete (classified as hazardous) had been placed in the general waste skip at Budbrooke Highways Depot	Removed and correctly consigned
An air conditioning unit attached to a modular building at Budbrooke Highways Depots - not on F-Gas register, not serviced	Not required - will be removed
Wastes stored in skips to the side of Wellesbourne Highways depot were poorly segregated. Skips were contaminated with WEEE (lamps and a microwave) as well as hazardous waste	Waste segregated prior to disposal
Spill kits at Wellesbourne HWRC were empty	Phone call made – Spill Kit delivered whilst Auditor on site
Evidence of spilt Waste Engine Oil next to Facility close to Drain and no Spill Kit at Wellesbourne HWRC	Replenished Spill Kit placed next to WEO Facility
Hydraulic Failure from gritter at Wellesbourne HWRC caused oil to disperse down slope onto HWRC - no record of action taken - or incident report	Area Site Manager and AGE UK Area Manager to ensure site operatives aware of Process for Reporting Spillages of this type.
Empty Waste Engine Oil Vessels currently placed in unlabelled open Bin next to WEO Facility (then placed into Landfill Skip) and/or into Plastic Recycling Containers inappropriately placed next to WEO Facility	Waste Engine Oil Vessels to be treated as Hazardous Waste. Suitable marked container provided to ensure Public deposit correctly.
2 x Fridges placed in Quarantine Area not under cover at Wellesbourne HWRC	Site now under WCC direct control - proper process in place
Full Butane Gas Cylinder located on site – not quarantined at Wellesbourne HWRC	Removed
Several TV's and Monitors dotted around site – not under cover at Wellesbourne HWRC	Site now under WCC direct control - proper process in place
No records of Monthly Corporate Water Temperature Monitoring taking place at Wellesbourne HWRC	Monthly monitoring undertaken by Corporate Facilities Team
Hazardous wastes are stored outside to the rear of the workshop in sealed drums. This area is covered but the containers were not banded and some appeared to be corroding at Wellesbourne CFM	Containers replaced
Poor housekeeping was noted in external areas – of particular concern were an old broken refrigerator, corroded containers and potential for windblown litter at Wellesbourne CFM	Housekeeping requirements stressed and improvement noted
Fire extinguishers at CFM Wellesbourne (both internal and external) had not been inspected within the last 12 months	Fire extinguishers now inspected
Some containers of oils / hazardous liquids were either not placed on bunds or were incorrectly placed on bunds at Wellesbourne CFM	Items re-located correctly
It could not be confirmed that 5 off AC units as part of project No 121338 – 3 of which required degassing was undertaken by qualified contractors.	Contractor informed of requirements - sub-contractor undertook training and now qualified
The process for ensuring that all relevant refrigeration equipment is captured is not evident/working:-	Process reviewed and revised
Campion School construction project - A 205 litre drum of gas oil was on site in the vicinity of the fuel tank. Although a bund was available the drum was not located on it.	Fuel was relocated following the audit
The Process for actions required to be followed up re AC units WET servicing not evident	Process reviewed and revised
At 38% of sites (13 of 34) W.E.T Reports showed no recorded temperatures. Alarming, at Shipston Fire Station 3 of 4 visits, no temperatures were recorded	Contractor informed of requirements
J. Hopwood informed that Age UK had a quantity of hazardous waste 'hidden' to the side of the shop at Princes Drive HWRC	Age UK informed of correct procedure

**Appendix C - Environmental Audit - Breakdown of Issues raised 2019-2020**

Main Classification	Nonconformity	Observation	Opportunity	Grand Total
Asbestos	1			1
Aspects & Impacts		1	2	3
Building - Survey	1			1
Bunding	1	3		4
Communication			8	8
Control of Contractors		3		3
CoSHH	1	2		3
Discharge Consent		1		1
Documentation - Control	1	3	1	5
Documentation - Improvement			1	1
Drainage		2	1	3
Drainage - Plan		3		3
Ecology/Biodiversity			1	1
Energy - Heating	1	3	1	5
Energy - Lighting		1	2	3
Energy - Vehicles			1	1
Equipment - Condition		1	1	2
Equipment - Failure			1	1
F-Gas	1	1		2
Fire - Extinguishers	1	2	1	4
Fuel/Chemical Storage	2	3	1	6
Grounds Maintenance		1		1
Health and Safety		2		2
Housekeeping	1	4		5
Inspections / Checks			1	1
Lease	1	1		2
Monitoring/Evaluation	3	2	3	8
Permit/Procedure			2	2
Permit/Procedures		2	1	3
Plastic - Catering			9	9
Plastic - Cleaning			1	1
Plastic - Packaging		1		1
Pollution Control			1	1
Property Services			1	1
Records - Incomplete	1	4	1	6
Salt Storage			2	2
Security		1	2	3
Spill Response	4	3	3	10
Standards			1	1
Training/Awareness	1		5	6
Waste - Collection	2			2
Waste - Compost			1	1
Waste - Documentation	4	4	1	9
Waste - Equipment			2	2
Waste - Opportunity			4	4
Waste - Packaging		1		1
Waste - plastics			4	4
Waste - Recycling		1	2	3
Waste - Segregation	7	18	1	26
Waste - Storage	11	11	6	28
Water - Dispenser			1	1
Water Hygiene	8	8	2	18
<b>Grand Total</b>	<b>53</b>	<b>93</b>	<b>79</b>	<b>225</b>



*A nonconformity represents non-compliance regarding legal, ISO 14001, WCC requirements or an actual / potential significant environmental risk.*

*An observation represents a weakness that, if not addressed, may lead to non-compliance or associated concern*

*An opportunity represents the potential to save money/resources, improve environmental conditions or may concern a non-environmental improvement suggestion.*