

ENVIRONMENTAL MANAGEMENT MANUAL

Version: 1

**Approved for Issue
13 April 2012**

**Keith Ball
Managing Director**

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1.0 Introduction

1.1 Organisation Description

Horizon Group Ltd provides cost effective display boards and loose furniture manufacture and supply services to customers within the United Kingdom.

Horizon Group Ltd is a privately owned company providing its services from its headquarters in Huddersfield.

Horizon Group Ltd design, manufacture and supply to sign companies and schools.

1.2 Scope of Conformance

Horizon Group Ltd is working to meet the requirements of ISO 14001:2004 at the following address:

Unit 15B Holme Mills Industrial Park
Britannia Road
Milnsbridge
Huddersfield
HD3 4QF

1.3 Third Party Assessment

It is acknowledged that Horizon Group Ltd's activities has minimal impact on the environment, but conforms to the ethos of Environmental Legislation. Conformance to such applicable legislation has been verified by SM & MS Ltd utilising an assessment and review process. The Managing Director has confirmed compliance following this process.

2.0 Organisation and Responsibilities

The following personnel are based within or working from the company offices.

2.1 Managing Director

The Managing Director is responsible for ensuring that the strategy and organisation of Horizon Group Ltd is defined and implemented to ensure effective implementation of the Environmental management System.

The Managing Director will investigate and respond to any complaints received regarding this policy or the Company's environmental performance or management.

2.2 Projects Director

The Projects Director will act as the Director with responsibility for Environmental issues and will direct Assistants to undertake supporting tasks whenever required to supplement the administrative duties of the company.

2.3 Managers/Supervisors

Managers/Supervisors will assist the Projects Director in the implementation of necessary policies and procedures to ensure compliance with Environmental legislation.

2.4 Staff

Staff will receive appropriate training, information, instruction and supervision to enable them to carry out their duties to both conform with applicable Environmental legislation and the policies and procedures of the Company.

3.0 General Requirements

3.1 Description

The environmental management system is documented within this Environmental Management Manual. The documented Environmental Management procedures are listed in Appendix E.

This manual shows the relationship between the Environmental Management System and BS EN ISO 14001. (Section 4.0 of this manual corresponds to ISO 14001:2004 Section 4).

3.2 Implementation and Maintenance

It is recognised that documenting the environmental management system is only the first step towards fully implementing its requirements. For this reason the Projects Director will brief all new and existing personnel on the requirements of the Environmental Management System to ensure full compliance.

The effectiveness of the implementation is measured through on-going internal audits of the environmental management system. Where implementation is deemed inadequate then steps are taken to resolve the situation in a timely manner.

The environmental management system as a whole will be reviewed during regular management review meetings where the completeness and effectiveness of the system and any steps necessary to improve it are discussed and actioned.

Whenever the environmental management system is changed the Projects Director will make all relevant personnel aware of the new or revised systems and monitor them to ensure that they are implemented effectively.

4.0 Environmental Management System

4.1 General Requirement

Horizon Group Ltd has established this Environmental Management Manual, integrated procedures and forms to enable the implementation of an ISO 14001: 2004 compatible environmental management system.

As an organisation the following steps have been taken to ensure compliance:

- All requirements of ISO 14001: 2004 have been specified within this document to ensure that all personnel concerned with its operation are aware of the requirements.
- The Projects Director shall take the lead to ensure that the environmental management system is fully implemented by all personnel.
- Regular management review meetings will be held to review the implementation of the requirements and identify any actions that are required to maintain and improve the system.

The scope to which this environmental management system will be applied is defined as all operations which it conducts at and from the address stated in section 1.2

4.2 Environmental Policy

The company's environmental policy is defined in Appendix B and is designed to reflect the environmental needs and responsibilities of the company's activities.

In particular the policy indicates the organisation's commitment to continual environmental improvement, the prevention of pollution, conformance to legislation and other requirements in relation to our environmental aspects.

The Projects Director ensures that the policy is made known to all personnel and is available to the public upon request.

4.3 Planning

4.3.1 Environmental Aspects

The company has identified the environmental aspects pertaining to its business operations and these are recorded and maintained within the management review meeting minutes to ensure that they are regularly reviewed.

The management review meeting attendees take account of the severity of the environmental aspects and the company's ability to influence them, so as they can determine which are significant.

The environmental aspects are considered when determining actions that are required to maintain the environmental management system.

4.3.2 Legal and Other Requirements

The Projects Director reviews all relevant environmental legislation using the NETRegs service (<http://www.netregs.gov.uk/netregs/legislation>) provided online by the Environment Agency and has identified all relevant legal requirements that are relevant.

Legal requirements are reviewed on a regular basis with assistance from the automatic emails received from NETRegs whenever legislation is updated or is newly published.

The management review meeting attendees ensure that the environmental aspects identified are understood in terms of relevant legislation.

4.3.3 Objectives, Targets and Programmes

Horizon Group Ltd will set out its environmental objectives and targets on a regular basis within the management review meeting minutes. Details of program dates and responsibilities will be defined. Improvements in environmental performance will be incremental and in keeping with the size of the company.

When setting objectives and targets the company will ensure that they are consistent with the environmental policy and the significant environmental aspects. In addition, technological options, financial, operational and business requirements will be considered.

In order to determine whether or not the objectives and targets are being met they will be measured, where practical, to allow progress to be monitored.

4.4 Implementation and Operation

Appendix D includes a flowchart showing the sequence and interaction of the environmental management system.

4.4.1 Resources, Roles, Responsibility and Authority

The Projects Director will assign personnel to the necessary duties outlined in this manual to ensure that the environmental management system is fully implemented.

Roles and responsibilities are defined and communicated through this environmental management manual.

4.4.2 Competence, Training and Awareness

The Projects Director ensures that only personnel with the suitable qualification and experience are employed on work tasks which have the potential to cause a significant environmental impact. He will take action to ensure that training requirements are met and that the effectiveness of training to meet requirements is monitored. All personnel are appraised with respect to competence.

The Managing Director will keep personnel fully aware of the importance of having the necessary training and experience and how they can work effectively to safeguard the environment to meet environmental objectives.

It is ensured that records of training, education, qualification and experience are maintained. Hardcopies of training certificates are held by the Projects Director.

4.4.3 Communication

The Projects Director will ensure that all personnel are made aware of factors impacting on the environmental management systems. He will also be the person responsible for receiving, recording and responding to any environmental communications.

4.4.4 Documentation

Documents that are necessary to meet the requirements of this environmental management manual shall be maintained as evidence of compliance.

4.4.5 Control of Documents

Document required by 4.4.5 above shall be approved for issue and reviewed and updated as necessary. The revision status and page numbering of documents shall be implemented to ensure that incorrect documents are not inadvertently used.

Only pertinent version of documents will be made available for use and it will be ensured that they are identifiable and legible.

4.4.6 Operational Control

The Projects Director shall ensure that the controls and any necessary operating criteria are stipulated where activities of the company are associated with significant environmental aspects,

Where necessary documented procedures will be prepared, implemented and maintained to define the operational controls necessary to minimise the environmental impacts.

4.4.7 Emergency Preparedness and Response

The company has identified the potential emergency situations and accidents pertaining to its business operations which may lead to an environmental impact. These are recorded and maintained within the management review meeting minutes to ensure that they are regularly reviewed and tested.

Where necessary documented procedures will be prepared, implemented and maintained to define the emergency response.

4.5 Checking

Horizon Group Ltd monitors and measures the effectiveness of its management systems through internal audit to ensure that the systems are competently implemented. Other operational monitoring is taken to ensure that the services are undertaken to a satisfactory environmental.

4.5.1 Monitoring and Measurement

Where required Horizon Group Ltd maintain registers of calibrated equipment used to monitor environmental aspects to ensure that they are not inadvertently used and that a suitable calibration certificate exists for all equipment in use.

4.5.2 Evaluation of Compliance

Conformance with legislation is reviewed in accordance with section 4.3.2 and evidence of evaluation is maintained through the management review process.

4.5.3 Nonconformity, Corrective Action and Preventive Action

All significant non-conformances are reported to management for completion of a Non-conformance Report (Appendix G). The following procedure outlines the process.

In order to achieve continual improvement, the causes of environmental problems that become known will be investigated and action taken to avoid recurrence.

Horizon Group Ltd understands that it is preferable and more effective to prevent environmental problems occurring. Acting in a proactive way is preferable to acting reactively. The Managing Director in consultation with other parties will therefore take opportunities to reflect on situations and take preventive action wherever possible.

4.5.4 Control of Records

The organisation shall maintain records as evidence that the requirements of this environmental management manual have been met. The records will be maintained so that they can be located and referred to easily.

4.5.5 Internal Audit

An internal audit programme is devised on an annual basis ensuring that all parts of the management systems are reviewed with any audit finding on a Non-conformance Report (Appendix G).

4.6 Management Review

Management review meetings are undertaken and all pertinent aspects are reviewed and actions taken as required. The meeting is undertaken in accordance with the agenda outlined in Appendix F. The meeting is attended by the Projects Director and any other interested parties.

The management review meeting is used as the pivotal means of ensuring that its systems are fully implemented and effective.

APPENDIX A

Definitions

“the Standard”	BS EN ISO 14001: 2004 Environmental Management Systems
“management system”	The defined methods, practices and organisation to meet the environmental requirement. The term Environmental Management System is synonymous.
“management manual”	The documented environmental system. Other documented procedures may be retained separately.
“management procedures”	The procedures documenting the environmental systems.
“environment”	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.
“environmental aspect”	Activities that can interact with the environment.
“environmental impact”	A change to the environment resulting from an environmental aspect.
"controlled copy"	The issue of a document that will be updated whenever it is revised.
"controlled issue"	The issue of a document where proof of receipt is sought from the recipient.

Note: The words "shall", "must" and "will" denote a mandatory requirement and "should" denotes a recommendation. The word "may" denotes permission and is neither a recommendation nor a requirement.

APPENDIX B

Environmental Policy Statement

Horizon Group Ltd's mission statement is to be recognised as a company of excellence that embraces continuous improvement, in partnership with our clients, to achieve innovation, best value and service excellence.

Horizon Group Ltd's Directors believe that environmental considerations must be at the heart of the way it is run and are committed to ensuring all aspects of Horizon Group Ltd's operations are managed sustainably. We are, therefore, committed to continual improvement in our environmental performance, preventing pollution and minimising adverse environmental impacts.

We will fulfil these commitments by:

- Complying with all relevant Environmental legislation, and any other requirements to which we subscribe
- Endeavouring to continually improve our environmental performance and reducing our negative environmental impacts
- Taking into account environmental criteria in the design and operation of buildings
- Establishing and reviewing environmental objectives and targets based upon this policy
- Provide training, support and encouragement to employees to ensure the effective implementation of environmental strategies
- Communicating our policy internally and externally

In particular, we will:

- Strive to reduce our use of energy and other natural resources in our operations
- Minimise our production of waste and effluent from our waste streams
- Effectively manage our waste by utilising careful purchasing and sustainable disposal
- Keep emissions to air and water to the lowest practicable level
- Provide information and assistance to all customers to ensure that they are aware of our commitment to the environment

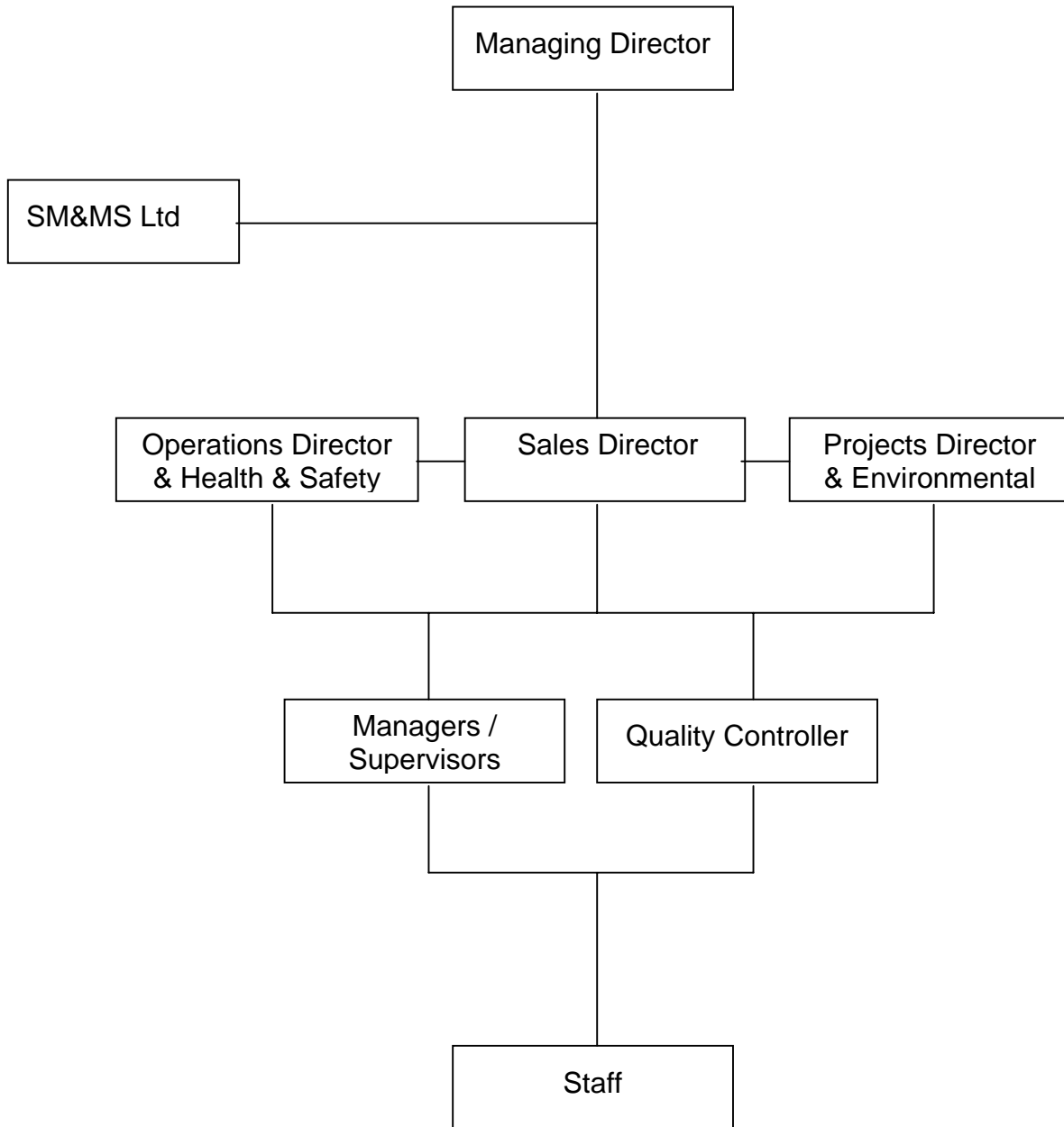
Copies of this policy can be obtained by contacting the Company at it's Huddersfield head office address.

Signed

Managing Director

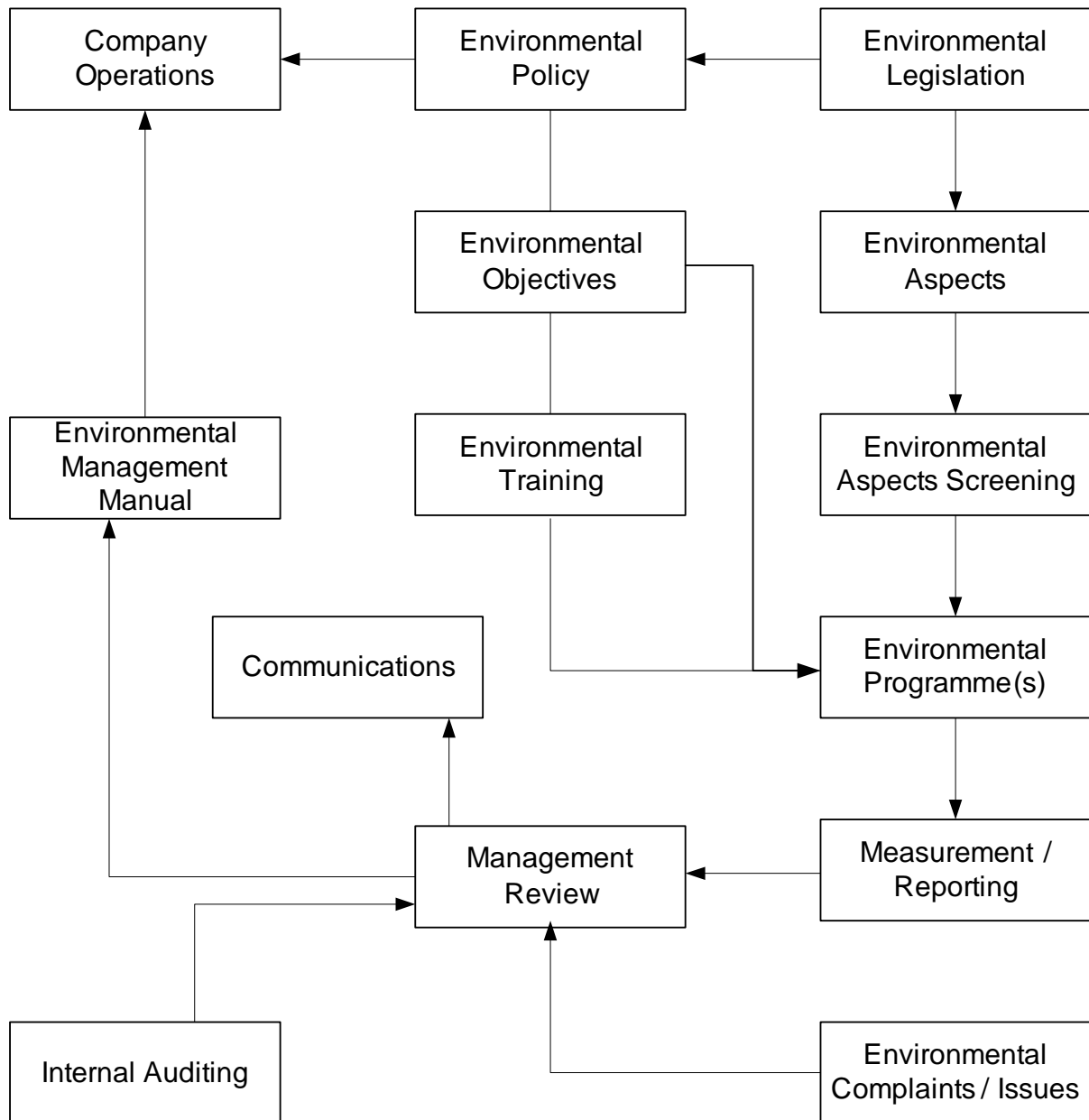
APPENDIX C

Organisation Chart



APPENDIX D

Environmental Management Processes



APPENDIX E

Index of Management Procedures

Title	Reference
<u>ISO 14001: 2004 Procedures</u>	
Environmental Aspects	Section 4.3.1
Legal & Other Requirements	Section 4.3.2
Competence, Training & Awareness	Section 4.4.2
Communication	Section 4.4.3
Control of Documents	Section 4.4.5
Operational Control	Section 4.4.6
Emergency Preparedness & Response	Section 4.4.7
Monitoring & Measurement	Section 4.5.1
Evaluation of Compliance	Section 4.5.2
Non-conformity, Corrective Action & Preventive Action	Section 4.5.3
Control of Records	Section 4.5.4
Internal Audit	Section 4.5.5
<u>Operational Procedures</u>	
List as required any other operational procedures that are needed to ensure proper environmental compliance.	

APPENDIX F

Management Review Meeting

Attendance:			Date:
Item	Agenda Item		Action by
1	Actions from previous meeting		
1.1	"Discuss and detail progress and closure of actions from the previous meeting"		
2	Internal audit results		
2.1	"Discuss the results for the internal audits that you have undertaken during the previous period. Show analysis of results where possible"		
3	Environmental Communications / Complaints		
3.1	"Discuss customer complaints and actions taken and to be taken. Show analysis where possible."		
4	Environmental Performance		
4.1	"Discuss the overall environmental performance. Show analysis where possible."		
5	Objective & Targets / Continual Improvement		
5.1	"Discuss the Environmental Programme (below) adding / updating table."		
6	Corrective & Preventive Actions		
6.1	Discuss corrective & preventive actions		
7	Environmental Aspects		
7.1	Discuss what may be forthcoming / changing to affect the environmental aspects and update table below.		
8	Preventive Actions / Suggestions		
8.1	"Discuss and record what steps have been and will be taken to avoid the occurrence of any problems that are likely to rise."		
9	Resources		
9.1	"Discuss resources and decide whether any changes need to be made to the resource levels currently in place."		
10	Next Meeting		DD/MM/YY
Record and retain the Management Review Minutes.			

11 - Minutes of Meeting – Environmental Programme

Overall Objective What is aimed for	Specific Action What will be done	Target Date / Measure of completion	Action by

12 - Minutes of Meeting - Environmental Aspects

Aspects Aspects that have environmental impacts	Legal Requirement (NetRegs)	Management & Monitoring How the organisation is managing & monitoring this aspect

APPENDIX G

Non-conformance Report

NCR No. :	Date:	Audit No. : (where relevant)
<p>Description of Non-conformance Raised due to : (delete not applicable) Internal Audit / Customer Complaint / Normal Working</p> <p>Reported by :</p>		
<p>Remedial Action (fix immediate problem)</p>		
Action by :	To be completed by :	(date)
<p>Action to Prevent Recurrence (the corrective action)</p>		
Action by :	To be completed by :	(date)
<p>Corrective Action Completed</p> <p>Managing Director (signed) (date)</p>		

APPENDIX I

ENVIRONMENTAL ASPECTS REGISTER

1.0 Scope

The scope of this Environmental Aspects Register covers the following operational areas:

Headquarters

Unit 15B Holme Mills Industrial Park
Britannia Road
Milnsbridge
Huddersfield
HD3 4QF

2.0 Purpose

The purpose of this Environmental Aspect Register is as follows:

- a) To make information available to management
- b) To provide a record and understanding of the current environmental aspects at each location and enable updating as required.
- c) To enable screening of the environmental aspects and decisions to be made on the focus of the environmental programmes.

Amendment Records

Revision	Issue Date	Description	Authorised by
1	24.2.11	Initial issue	Managing Director
2	5.4.11	Actions Added	Managing Director
3	13.4.12	General review	Managing Director

Aspect Analysis

Environmental Impact	Environmental Aspect L Large Aspect M Medium Aspect S Small Aspect	Scoring			Significant #
		Normal	Abnormal	Emergency	
Discharges					
To Air	Gas Burning	S			No
	Car Exhausts	S			No
To foul sewer	WC waste	S			No
	Kitchen Waste	S			No
To storm sewer	Storm drainage	S			No
To land	Car sump oil leakage	M			No
Waste					
To landfill / (Recycle)	Office paper	S			No
	Redundant Office equipment ¹	S			No
	Ditto consumables ²	S			No
	Domestic type waste	S			No
	Excavated material	S			No
	Cable	S			No
	Aluminium	M			No
	Fluorescent Tubes	S			No
	Empty canisters	S			No
	Plastic packing/sheeting	M			No
	Timber packing	M			No
Resources					
Electricity	Electric lighting	S			No
	Electric heating / Cooling	S			No
	Office equipment	S			No
	Electric tools	M			No
Gas	Gas heating	S			No
Petrol / Diesel	Cars / vans	M			No
Materials	Cable	S			No
	Aluminium	M			No
	Cleaning Agents	S			No
Water	Domestic Use	S			
Noise	Vehicles / plant	M			
	Drilling / fixing	M			
Storage Aspects					
	Lubricating Oil	S			No
	Canisters / solvents	S			No

¹Computers, Printers, Photocopiers, Mobile Phones, Facsimiles, Telephones

²Printer (Drum, Toner, Cartridge), Mobile Phone Batteries

Noise and Working Hours

For site work all Horizon Group Ltd employees will conform to the standards as, laid down by the Main Contractors, for all site workers with regard to noise reduction and working hours. Horizon Group Ltd employees usually have to sign in/out at the site office.

Responsibility

A competent member of staff will assume responsibility for carrying out and monitoring environmental risk assessments. Currently assigned to Matthew Wilson / Ian Kinder.

Scope of Operation

The risk assessments are generic to the organisations scope of operations.

Communications

All employees will be furnished with a copy of the environmental risk assessments and all new employees will be supplied with a copy at induction. The impact and environmental aspects will be explained to them at the time.

Review

The risk assessment is to be periodically reviewed – preferably annually.

The following are the points that the company feels it control and can make a difference to the environment.

Discharges

Car Exhausts The company's vehicles are all diesel to reduce emissions into the atmosphere.

Waste

Aluminium The company ensures all waste aluminium is recycled via an authorised waste controller.

Plastic Packing The company ensures all waste plastics are returned to the supplier in the pre-determined crates for recycling.

Timber Packing All pallets received are re-used for deliveries.

Resources

Cars/Vans It is the company's policy to only purchase diesel vehicles.

Aluminium Whenever possible the company purchases aluminium from suppliers who recycle.

APPENDIX J

Environmental Legislation

Primary Legislation	Description of Duty Imposed
Environmental Protection Act 1990	The system of integrated pollution control set up under this Act includes control of discharges to water. The best practicable environmental option must be chosen for waste products, the choice generally being between water, land and air.
Water Industry Act 1991	This Act controls trade effluent discharges to sewer. Any organisation wishing to discharge anything other than sewage into the sewers must hold a consent from the local sewerage undertaker, detailing limits on such things as pH suspended solids etc.
The Water Supply (Water Fittings) Regulations 1999	<p>Made under section 74 of the Water Industry Act 1991 to prevent the waste, misuse, undue consumption, contamination or erroneous measurement of drinking water.</p> <p>These regulations set minimum requirements for the design, installation and maintenance of plumbing systems and water fittings in England and Wales. Enforced by local water authorities.</p> <p>Specific requirements of the regulations include;</p> <ul style="list-style-type: none"> • preventing contamination through backflow prevention devices; • water conservation with minimum standards set for water consumption and flush volumes, • durability and leak tightness of water fittings and guidance on minimising the length of pipe runs.
Contaminated Land (England) Regulations 2000	Defines further details of contaminated land then designated as a special site under certain conditions.

Primary Legislation	Description of Duty Imposed
Water Resources Act 1991 (England & Wales)	<p>This Act contains the primary provisions relating to pollution of water. These may well be applicable where the contaminated land has resulted in pollution of surface waters or groundwater's.</p> <p>Causing, or knowingly permitting, water pollution to occur is a criminal offence.</p> <p>The EA can also take action to require anti-pollution works where they consider poisonous, noxious or polluting matter is likely to enter, be present or have been present in controlled waters.</p>
Environment Act 1995	<p>Adds a new part to the 1990 act, which provides a statutory framework for contaminated land. The local authority is required to inspect their areas from time to time. If land is found to be contaminated the owners will be notified and may be served with a remediation notice.</p>
Environmental Permitting (England and Wales) Regulations 2010	<p>European Waste Codes (EWC) should be present on all waste transfer notes whether this is on each individual consignment note or on the annual note. Pre-treatment of all waste should take place prior to landfill, ie waste streams should be segregated. If the company do not undertake this themselves, an audit trail/records should be retained to demonstrate that the waste companies down the chain do this on their behalf.</p>
Groundwater (England and Wales) Regulations 2010	<p>There should be no discharge of chemicals/substances/pollutants to land which can cause groundwater pollution.</p>
Waste Electrical and Electronic Equipment Regulations 2006	<p>The Waste Electrical and Electronic Equipment (WEEE) Regulations aim to reduce the amount of waste going to landfill and improve recovery and recycling rates.</p> <p>The WEEE Regulations apply to those generating, handling or disposing of waste, and require the recovery of materials from such equipment. E.g TV's, fridges, microwaves, IT and telecomms equipment etc.</p> <p>Places duties on users to store, collect, treat, recycle and dispose of WEEE separately from other waste, and arrange for licenced waste management companies to collect such waste.</p>

Primary Legislation	Description of Duty Imposed
Hazardous Waste Regulations 2005	<p>These regulations replace the Special Waste Regulations, and apply to all producers and carriers of waste from premises and underlines a duty of notification of premises to the Environment Agency.</p> <p>This applies to all sites producing 200 kg of more of hazardous waste in any twelve-month period. I.e. TV's, lead acid batteries, fluorescent tubes, domestic fridges, asbestos waste.</p>
Environmental Protection Act 1990 Part II	<p>This sets up the scheme for waste management licensing and makes it an offence to dispose of, treat or store controlled waste without a license.</p>
Controlled Waste Regulations (England and Wales) 2012	<p>These regulations give a detailed definition of controlled waste, classifying the differences between household, commercial and industrial waste and the types of waste for which local authorities may make a charge for collection and disposal.</p>
Environmental Protection (Duty of Care) Regulations 1991	<p>All waste disposal/ collection companies must be properly licensed with the EA. A transfer note must accompany all controlled waste leaving site and all wastes must be safely and properly labelled, identified and stored.</p> <p>To avoid unlimited fines, measures should be taken to ensure that wastes are:</p> <ul style="list-style-type: none"> • kept secure; transferred only to appropriately licensed carriers and managers; • recorded with signed, completed transfer notes kept for two years, and; • handled and disposed of in accordance with the law. <p>Repeat transfers of the same kind of waste, between the same parties, can be covered by one transfer note for up to a year.</p>
Waste Management Licensing Regulations 1994	<p>These regulations implement the waste management licensing scheme. They define waste in categories and require waste management licenses or exemptions and technically competent people in control.</p>
Environmental Protection Act 1990	<p>Part II imposes a duty of care for waste disposal, and applies to all forms of waste, including packaging. The duty of care requires that waste be transferred and carried away for disposal only by registered carriers. It must only be disposed of in properly licensed disposal facilities</p>

Primary Legislation	Description of Duty Imposed
Environment Act 1995	This Act contains important provisions for the recovery and recycling of packaging waste. The Producer Responsibility Obligations (Packaging Waste) Regulations 1997 are the first set of regulations to be made under s.93 of the Environment Act 1995
Producer Responsibility Obligations (Packaging Waste) Regulations 2007	<p>The Regulations aim to implement the recovery and recycling targets set out in the EC Directive on packaging and packaging waste.</p> <p>An organisation is obligated under these Regulations if it is involved in the packaging chain and passes two threshold tests, one based on its total turnover and the other on the quantity of obligated packaging handled.</p>
Packaging (Essential Requirements) Regulations 2003	<p>These Regulations impose certain conditions on packaging.</p> <p>We must ensure that all our packaging materials, as supplied by our various suppliers, comply with these Regulations.</p>
Environment Protection Act 1990 Part III	This Act defines the various emissions that, if prejudicial to health or a nuisance, may be statutory nuisance. Where this occurs, local authorities have the power to serve an abatement notice.
Climate Change Levy Regulations 2001	The climate change levy began generating revenues from April 2001. The levy is charged on all businesses for the gas, coal and electricity used. The levy is intended to aid a reduction in CO ₂ emissions in light of the UK's commitment at Kyoto 1997.
Town and Country Planning Act 1990	<p>The purpose of the planning system is to regulate and control the use and development of land. Planning controls are mainly concerned with the size, design, location and control of operation in order to avoid or minimise the adverse effects on the use of land and the amenities.</p> <p>This can be achieved through the refusal to grant planning permission, the addition of planning conditions, legal agreements to regulate the development and use of land, and in the development of planning policies in local plans, UDPs, etc</p>

Primary Legislation	Description of Duty Imposed
Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999	<p>Schedule 2 lists those projects that may require an EIA, if they exceed certain thresholds and if they are likely to give rise to "significant" environmental effects.</p> <p>All new developments of retail parks and similar above 0.5 hectare will need to be put to the local planning authority (LPA) for a "screening opinion" as to whether or not development is likely to need an EIA</p>