



Council of the  
ISLES OF SCILLY

# **ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)**

OFF ISLAND WASTE MANAGEMENT

January 2021

## EXECUTIVE SUMMARY

### **Purpose of Environmental Management System (EMS)**

The purpose of this EMS is to establish a structured methodology that will support the Council in identifying and controlling the environmental impacts resulting from its waste management activities, and which will in turn improve environmental performance at the waste collection points on the off islands.

### **Key Aspects of EMS**

#### ***Training***

Under the EMS there is a provision for training for each of the off island contractors.

Training is focused predominantly on these key areas:

- Pollution Prevention & Response;
- Environmental Awareness;
- Maintenance / operations; and
- Accident and emergency.

Training need will be reviewed and assessed on an annual basis.

#### ***Waste Acceptance Procedure***

The waste acceptance procedure details the materials accepted at the off islands including suitable methods of storing different waste types. Details of waste types and estimated quantities will be updated in the Site Log Book(s).

#### ***Site Maintenance and Inspection***

This Section sets out the operational procedures and responsibilities for regular inspection of the site and for any repair and maintenance of the site and site equipment. Details of site repair and maintenance will be captured in the Site Log Book(s).

#### ***Accident Management***

The Accident Management Plan identifies potential environmental risks of accidents on the sites and provides information on how to manage and minimise unforeseen incidents. The Plan identifies the following environmental risks on site:

- Fire;
- Pollution, spillage and leakage;
- Non-conforming wastes;
- Damaged or badly maintained site infrastructure or equipment; and
- Flood.

All incidents will be recorded in the Site Log Book(s).

### ***Site Emissions and Monitoring***

This section of the EMS provides guidance on how to monitor and mitigate instances of the following emissions on site;

- Odour;
- Dust;
- Noise;
- Pests; and
- Litter.

Instances where the above emissions have increased or have caused concern will be recorded in the Site Log Book(s).

### ***Complaints***

The Site Log Book(s) will also provide the opportunity for any complaints made by residents, visitors or Site Managers / Operatives to be recorded. Where a complaint has been addressed this should also be captured in the Log Book(s) and if the complaint cannot be addressed by the Site Manager or Operative then it should be raised with the Council.

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## 1.0 INTRODUCTION

The Council of the Isles of Scilly operates three waste collection points on the islands of Bryher, St. Martins and St. Agnes and it has been agreed with the Environment Agency (EA) that these sites meet the criteria for Non Waste Framework Directive (NWFDD) Exemptions for the temporary storage of waste at the place of production. This exemption does not require registration with the EA and allows the secure storage of waste at the place of production, pending its collection for up to 12 months, including ancillary treatment.

Under the Environmental Permitting (England and Wales) Regulations 2010, an EMS is not required to cover the exempt activities; however, in the pursuit of good practice, the Council intends to apply this Environmental Management System (EMS) to all aspects of its waste management activities as far as is appropriate.

The purpose of this EMS is to establish a structured methodology that will support the Council in identifying and controlling the environmental impacts resulting from its waste management activities, which will in turn improve environmental performance at the waste collection points on the off islands.

This EMS has been compiled using the EA's H6 Guidance, Environmental Management Systems, which states that the type of EMS implemented should be proportionate to both the scale and the risk that the activities pose to the environment. An in-house EMS has therefore been developed for the Isles of Scilly off islands (Bryher, St. Martins and St. Agnes) to ensure that exemptions and all relevant legislation are complied with.

The operating procedures described herein will allow the Council to plan for and demonstrate that steps have been taken to reduce or prevent environmental harm occurring as a result of its operations, and provide a methodology for implementing and reviewing the organisation's environmental management.

The procedures in this EMS have therefore been designed to:

- Identify the risks to the environment from the site, including those arising from operations, maintenance, accidents, incidents, and non-conformances;
- Set out procedures for operating the site that reduces those risks;
- Set out how this will be managed and reported on; and
- Set out who is responsible for managing each part of the procedure.

This EMS will be reviewed at least once every 4 years or in response to significant changes to the activities, accidents or non compliance and will be freely available to all employees, management, any contractors working at the sites, and the Environment Agency.

## 2.0 ENVIRONMENTAL POLICY

The Council's Waste Reduction Strategy commits to working with local stakeholders to;

- Reduce the overall volume of waste across the islands by 15% by 2025 and then by 25% by 2030
- Increase the amount of material that is reused
- Increase the amount of waste that is recycled or composted
- Improve communications with householders, visitors and businesses regarding waste and recycling collection services
- Deliver initiatives that support waste reduction, re-use, recycling and composting.
- Provide safe, efficient, cost effective and reliable services which meet the needs of the community
- Provide services that keep the environment and public realm attractive, clean and litter free.

## 3.0 COMPLIANCE AND PERFORMANCE

Legislation/code of practice	Applicable to which site/operation	Where copy is held	Person responsible for compliance
NWFD Exemptions EA Guidance Note on Temporary Storage at a Place of Production	Waste Collection Sites on Bryher, St. Agnes and St. Martins	Site Lock Box	Site Managers: Bryher St. Agnes St. Martins

Incidents and non-conformances identified at any of the above mentioned sites are recorded by the relevant site manager using the Site Log Book. Incidents and non conformances are to be reported to the Waste and Recycling Officer on a weekly basis, or as soon as possible where there is the risk of significant pollution.

## 4.0 TRAINING AND QUALIFICATIONS

- All staff have clearly defined roles and responsibilities (Appendix EMS4\_1);
- Records are maintained of the skills required for each post; and
- Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirements of each post (Appendix EMS 4\_2)

### 4.1 Roles and Responsibilities

Name	Job Title	Reporting To	Job Role and Responsibilities
Tanya Saker	Senior Officer: Infrastructure	Senior Manager	Responsibility for overall waste management activities on the Isles of Scilly
Rebecca Williams	Officer: Waste & Recycling	Senior Officer: Infrastructure	Responsibility for waste and recycling activities on the Isles of Scilly

Russ Thompson	Waste Site Supervisor	Officer: Waste & Recycling	Responsible for the day to day implementation of all waste management activities
TBC	Bryher Site Manager	Waste Site Manager	Responsible for the day to day operation of the Bryher waste site
TBC	St. Agnes Site Manager	Waste Site Manager	Responsible for the day to day operation of the St. Agnes waste site
TBC	St. Martins Site Manager	Waste Site Manager	Responsible for the day to day waste operations on St. Martins

#### 4.2 Staff Training

An assessment of training needs has been carried out to identify the posts for which specific environmental awareness training is needed, and the scope and level of such training.

JOB	TRAINING REQUIRED												
	Environmental Awareness												
	Maintenance/operations						Accident and Emergency						
	Certificate of Technical Competence	Supervision of waste management	Environmental Permit awareness	Duty of Care and record keeping	Exemptions including NWFDF	Pollution prevention and control	General site maintenance	Waste acceptance and control	Operation controls	Waste separation and storage	Fire procedure	Spill response procedure	Notification to the Council and EA
Senior Officer		√	√	√	√	√		√	√				√
Waste Site Supervisor, St Mary's	√	√	√	√	√	√	√	√	√	√	√	√	√
Contractor Bryher		√			√	√	√	√	√	√	√	√	√
Contractor St. Agnes		√			√	√	√	√	√	√	√	√	√
Contractor St. Martins		√			√	√	√	√	√	√	√	√	√

#### 5.0 OPERATING PROCEDURES

Operating Techniques and Procedures for each of the three locations used by the Council for off island waste management activities. The specific Procedures for waste management on the off islands are detailed below in Sections 6 to 10 of this EMS and are summarised in the Site Log Book. These procedures also assess the potential risks to the environment from the activities at each of the sites and include details of the measures that will be taken to minimise these risks.

## **6.0 WASTE ACCEPTANCE PROCEDURE**

### **6.1 Purpose**

The procedures in this section are provided in the grey boxes and set out the normal operation of the site. A short description of the procedures is also provided.

### **6.2 Operating hours**

Site opening times will be advertised:

- On a board at the site entrance;
- On the off-island community notice board
- On the Council of the Isles of Scilly website.

Supervision of visitors is vital to ensure that materials and wastes are deposited in the correct areas of the site and that no wastes are brought onto the site that cannot be accepted (see Waste Acceptance, Section 6.3).

#### **Waste Acceptance Procedures (Operating Hours)**

The site will only be open when the Site Manager or another attendant is present to supervise visitors.

Outside normal opening hours, and when the Site Manager is not present to supervise visitors, the site gate should be securely locked.

The Site Manager will be responsible for ensuring the site is unlocked during specified opening times and securely locked outside these opening times.

### **6.3 Acceptable Wastes on Site**

The site accepts the following wastes:

- Plastics;
- Wood;
- Paper and cardboard;
- Metals;
- Waste Electronic and Electrical Equipment (WEEE), including batteries;
- Hazardous household wastes such as aerosols, paints & chemicals;
- Bulky waste (large items such as furniture etc); and
- Waste food and other domestic mixed waste.

The site **does not routinely** accept:

- Asbestos

Advice needs to be sought before asbestos is accepted onsite.

The site **does not** accept under any circumstances

- Explosive wastes, such as flares etc

### **Waste Acceptance Procedures (Acceptable Waste Streams)**

All waste brought to the site should be visually inspected where possible by the Site Manager and the visitors advised where on the site the items should be deposited. Wastes should not be accepted onto the site if there is not enough storage space in the correct area or container for that type of waste.

If a site visitor has wastes to dispose of that are not accepted by the site, the Site Manager should provide contact details at the Council for advice.

### **6.4 Quarantine of Non-conforming wastes**

Non-conforming wastes are wastes that cannot be accepted by the site.

Supervision of the site during hours of opening, and locking of the gates outside these times, should reduce the possibility of non-conforming waste being deposited.

### **Waste Acceptance Procedures (Non Conforming Wastes)**

If the Site Manager suspects that a non-conforming item or waste type has been deposited in the site, this should be moved to the designated quarantine area (where applicable) if it is safe to do so.

The Site Manager or attendant should inform the Council as soon as possible so that they can arrange for the waste to be removed by a suitable contractor.

The Council will be responsible for arranging the removal of any non-conforming waste(s) from the site.

The Site Manager should record details of the non-conforming waste(s) in the Site Log Book.

### **6.5 Waste Treatment**

A small amount of waste 'treatment' is allowed on the site to help the onward transport of certain wastes for disposal or recycling.

Allowed treatments include:

- Compacting and baling (where available)
- Glass crushing (using the on-site equipment); and
- Bulking waste ready for collection.

### **Waste Acceptance Procedures (Treatment of Wastes)**

The Site Manager will be responsible for any waste treatment operations carried out while on site.

The Council will be responsible for providing training on any treatment operations and on the use of any equipment.

### **6.6 Waste Storage and Collection Procedure**

Correct storage and the regular collection of wastes from the site will help to keep the site clean and prevent pollution of the surrounding area.

Waste will be stored on site until collection. The normal schedule and means for collection of the waste will be:

- **Food and other domestic mixed wastes:** Collected weekly for transportation by boat to the Porthmellon Waste Management Site on St. Mary's.
- **Waste Electrical and Electronic Equipment (WEEE):** Collected by a third party contractor who transports the items directly to the mainland for recycling.
- **Metals and batteries:** Shipped to the mainland for recycling via the Porthmellon Waste Management Site.
- **Glass:** Shipped to the Porthmellon Waste Management Site, recycled and used as an aggregate on St. Mary's.
- **Plastics, cardboard, paper, wood and bulky wastes:** Shipped to the Porthmellon Waste Management Site on St. Mary's.
- **Residual and other wastes:** Collected when boats are available to transport the skips/containers the Porthmellon Waste Management Site on St. Mary's.

### **Waste Acceptance Procedures (Storage and Collection)**

The Site Manager will be responsible for ensuring access is available for the collection of wastes according to the schedule or arrangements.

Wastes should be stored within the correct areas and containers on the site pending collection.

The Site Manager should advise the Council if any of the storage areas or containers are likely to be over-full before collection.

The Council will be responsible for arranging the collection of wastes from the quayside.

### **6.7 Measuring Quantities**

A summary report of waste types and quantities accepted and removed from the site shall be recorded each day and reported on a monthly basis to the Council.

### **Waste Acceptance Procedures (Reporting Waste Data)**

The Site Manager will make a visual estimate of the quantity of waste as it leaves the site based on fullness of containers or bays, or in the case of large items such as white goods, number of items. The amount of waste leaving the site will be recorded in the Site Log Book.

### **Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

## **7.0 SITE MAINTENANCE & INSPECTION**

### **7.1 Purpose**

This Section sets out the operational procedures and responsibilities for regular inspection of the site and for any repair and maintenance of the site and site equipment.

The intention is to outline the activities needed to ensure that the [name of Off Island] facility remains operational and able to receive, safely store, record and despatch to [name of facility] all locally generated wastes. The activities listed are not fixed and should be reviewed and developed on an ongoing basis from the publication of this document.

The following stakeholders should be consulted each year:

- Site Manager;
- Local residents; and
- Council of the Isles of Scilly.

### **7.2 Site Information Board**

The site information board provides information on site opening times, emergency contact details and the location on site of emergency equipment.

It is therefore essential that the board is:

- Regularly updated;
- In a good, readable condition; and
- Permanently fixed in the correct location.

### **Site Maintenance Procedures (Site Information Board)**

The Site Manager should check the site information board as part of a regular site walk-over, and at least weekly.

The Site Manager should report any damage to the board that affects the readability or its fixing to the Council as soon as possible.

The Site Manager should advise the Council of any changes required to the information displayed on the board.

The Council will be responsible for the repair or replacement of the board and for keeping the information displayed up to date.

### **7.3 Plant and Equipment**

All items of plant and equipment (where applicable) will be maintained in accordance with manufacturers' recommendations.

The site contains a number of fixed items of plant which should be operated in the manner set out in the manufacturers' documentation.

Such items are:

- Oil containment and secondary bunding;
- Fire extinguishers; and
- First aid and eye wash stations.

Below is listed a planned preventative maintenance schedule, which should be reviewed every 4 years or in response to an incident.

#### **Yearly**

- Fire extinguishers are to be checked by competent person.

#### **Monthly**

- Check that all damage to fences or gates reported previously has been repaired;
- Wastes are clearly segregated, and safely stacked;
- Send completed record sheet from Site Log Book with Contractor's monthly invoices to Council ;
- Check raised platform is still fit for purpose;
- First aid kit is available and up to date; and
- Check that all signs are in place, intact and legible.

#### **Weekly**

- All litter is cleared from operational areas;
- Oil tank bund is empty of rain water;
- Ensure that all information is updated within the Site Log Book; and
- Sufficient waste is bulked up for transport to Moorwell to allow for the next month's disposal.

#### **Daily**

- Fences are checked to ensure they are intact;
- Site is tidy and safe for public access; and
- Visitors to the site understand where to place waste materials.

#### **7.4 Security and Vandalism**

The site includes the following modifications to prevent unauthorised access and deposit of waste out of hours when visitors cannot be supervised. These measures include:

- *Fencing*: fencing extends around the full perimeter of the site;
- *Security gates*: the new access gates will be securely locked whenever the site is unattended;
- *Clearing of boundary*: The boundary immediately outside the fence will be maintained clear of vegetation so that the perimeter and fencing can be inspected easily.

#### **Site Maintenance Procedures (Security and Vandalism)**

The Site Manager should inspect the gates and fencing at the beginning of each day or shift for any damage or deterioration and the need for any repair. This should be part of a regular site inspection.

If there is any damage to the gates or fencing, the Site Manager should report the damage to the Council (using the Site Log Book) and make any temporary repairs where practical and as soon as possible.

The Council will be responsible for arranging any permanent repair to site security and will do so as soon as practicable.

If the Site Manager suspects that there has been unauthorised access to the site, this should be reported to the Council. Any investigations or actions taken as a result should be noted in the Site Log Book.

#### **Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

### **8.0 ACCIDENT MANAGEMENT PLAN**

#### **8.1 Purpose**

The Council of the Isles of Scilly recognises the importance of the prevention of accidents that may have environmental consequences.

An accident management plan will be implemented and maintained at the site to ensure the site and site personnel are fully prepared for any such incidents.

The following procedures describe the identification and minimisation of risks posed to the environment. Health and safety (H&S) of operatives, contractors and visitors is separately managed in compliance with H&S regulations and Council H&S Policy.

## **8.2 Risk Identification**

The following potential risks have been identified on the site:

- Fire;
- Pollution, spillage and leakage (refer to Section 8.5 of this EMS);
- Non-conforming wastes (refer to Section 6.4 of this EMS);
- Damaged or badly maintained site infrastructure or equipment (refer to Section 7.4 of this EMS); and
- Flood.

### **Accident Management Plan Procedures (Risk Identification)**

The Site Manager should identify further hazards and risks as part of the regular site inspection process. Risks and Hazards identified should be noted in the Site Log Book. The Council will provide training on hazard, risk and accident management.

## **8.3 Preventing and minimising accidents**

It is important wherever possible to aim to prevent accidents before they happen and to take steps to ensure that the impact of any accident is minimised if it does occur.

General steps that can be taken are:

- Keep a log of all incidents and near misses;
- Clearly define roles and responsibilities for managing accidents;
- Provide training and clear instructions for the management of accidents; and
- Ensure appropriate and properly maintained equipment is on site to help manage any accident.

Actions that could be taken to minimise specific risks are detailed below. The maintenance of site equipment is included in Section 7.3.

### **Accident Management Plan Procedures (Prevention and Minimising Risks)**

The Site Manager should keep a list of all incidents and near misses in the Site Log Book.

## **8.4 Fire**

To minimise the risk and potential impact of fire the following points should be followed:

- Incompatible materials should be stored apart where possible;
- Smoking will not be permitted in the operational areas of the site;
- Fire extinguishers will be provided at designated locations; and

- Training of employees and contractors will cover the assessment of fire hazards, fire prevention, emergency procedures, evacuation and use of extinguishers.
- The Council will provide training to contractors covering:
  - Fire prevention;
  - Use of fire extinguishers; and
  - Emergency procedures and evacuation of the site.

### **Accident Management Plan Procedures (Fire)**

#### **In event of a fire on site, the Site Manager should:**

1. Evacuate visitors from the site
2. Notify those responsible for emergency fire response immediately
3. Notify the Council as soon as practicable
4. Isolate the burning area and attempt to extinguish the fire using the on-site fire extinguishers, if safe to do so
5. Prevent, if possible, the drainage of any contaminated liquid / water onto un-surfaced ground

### **8.5 Spillage and Leakage**

Spillage or leakage of liquids either from on-site storage containers or those brought to site for disposal can result in pollution of the site and surrounding area.

All waste will be stored on an area of concrete hard standing. Given the very small quantities of waste stored at the site and relative low risk nature of the majority of waste types to be accepted, it is considered appropriate that surface water will normally drain via a soakaway. However, in the event of a spillage this arrangement does not include an interceptor to catch any liquid before it reaches the environment.

It is important that any spillage is cleaned up as soon as possible so that the impact can be minimised. A spill kit has been provided for use on site.

The wider issue of pollution is covered in detail in Section 9 of this EMS.

### **Accident Management Plan Procedures (Spillage and Leakages)**

The Site Manager should clean up any minor leaks or spillages immediately using sand or the spill kit provided. The resulting contaminated materials should be placed in a suitable container for off-site disposal to a suitable facility.

In the event of a major spillage, likely to cause pollution of the environment, the Site Manager should take immediate action to contain the spillage and prevent liquid from entering un-surfaced ground. The Council should be contacted as soon as practicable.

All spillage incidents should be noted in the Site Log Book.

The Council will provide training on spillage management.

**Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

**9.0 MONITORING SITE EMISSIONS****9.1 Purpose**

The purpose of this procedure is to set out how to minimise the risk of emissions from the site and how to minimise their occurrence. The procedures within this section of the EMS deal with odour, dust, noise, pests and litter. Spillage of liquid has been dealt with separately under Section 8.5 of this EMS.

**9.2 Odour**

Due to the location of the site and the very small quantities of waste handled, the site is considered to pose a low risk of odour nuisance. However, it is still important that any wastes that have high odour levels are managed properly on site.

In particular, food waste and other potentially odorous wastes should be stored in sealed containers that are removed from the site by boat on a weekly basis.

**Monitoring Site Emissions Procedures (Odour)**

The Site Manager will be responsible for ensuring the correct storage of food and other odorous wastes on site.

Any incidents or complaints of odour pollution should be noted in the Site Log Book.

**9.3 Dust**

Due to the nature of the majority of waste types handled and very small quantities of waste received, the site is considered to pose a low risk of dust emissions.

However, measures should still be taken to ensure that the risk is maintained at a low level, especially in hot, dry weather or windy conditions.

**Monitoring Site Emissions Procedures (Dust)**

The Site Manager should dampen down potentially dusty wastes as necessary during prolonged periods of dry weather.

The Site Manager should ensure that hard surfacing is kept clean and clear by sweeping and treatment with water where necessary.

The potential for dust pollution should be included in the Site Manager's regular site inspection, particularly during dry, windy weather conditions.

Any incidents or complaints of dust pollution should be noted in the Site Log Book.

## 9.4 Noise

The proposed waste operations will be managed so as to minimise noise emissions. Measures that will be taken at the site include:

- Speed limits will be imposed for vehicles travelling on site (where applicable);
- Noise will be controlled through the use of effectively silenced plant (where applicable); and
- All plant will be maintained in accordance with manufacturers' recommendations to minimise noise emissions.

### Monitoring Site Emissions Procedures (Noise)

The Site Manager will ensure that the above measures are adhered to and that visitors and contractors coming on site are aware of them.

Any incidents or complaints of noise pollution should be noted in the Site Log Book.

## 9.5 Pests

Although the risk of pest infestation at the sites is considered to be low, there are wastes on site, such as food waste and containers that may have contained food or drink, and that have the potential to attract pests, vermin and insects, especially during warm weather.

It is important that appropriate measures are taken to minimise the chances of infestation.

### Monitoring Site Emissions Procedures (Pests)

The Site Manager should include infestations of pests, vermin and insects as part of the regular site inspections.

Food wastes will be stored in containers that are maintained above ground level.

All other waste storage areas will be completely cleared of waste on at least an annual basis.

Any pest related incident or complaint should be noted in the Site Log Book.

## 9.6 Litter

The risk of litter from the site polluting the surrounding area should be limited by the correct containment of the waste and the perimeter fencing. The risk of litter does remain however, particularly during windy weather.

### Monitoring Site Emissions Procedures (Litter)

The Site Manager should ensure that hard surfacing is kept clean and clear of litter.

The Site Manager will inspect the area around the perimeter of the site on a daily basis and will collect any litter and return it to the main waste storage area(s) as soon as practicable.

Any litter related incident or complaint should be noted in the Site Log Book.

### **Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

## **10.0 COMPLAINTS**

### **10.1 Purpose**

This procedure sets out how complaints by residents, and Site Managers or operatives should be dealt with and responded to.

### **10.2 Dealing with complaints**

Any complaints made by local residents, visitors or site operators will be recorded in the Site Log Book. It is possible that complaints might also require immediate remedial action under other procedures – for example if the complaint involves a pollution incident.

### **Complaints Procedure**

Where possible complaints should be noted in the Site Log Book, together with how the complaint has been responded to.

Where a complaint refers to an incident such as pollution the Site Manager may be able to take immediate action referring to the appropriate procedure.

The Site Manager should inform the Council as soon as possible regarding any complaint about the site that cannot be dealt with practically.

### **Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

## **11.0 STAFF TRAINING AND COMPETENCE**

### **11.1 Purpose**

This procedure sets out the roles and responsibilities with regard to staff training and competence.

### **11.2 Training and Competence**

The Site Manager will need to be competent to operate the site in accordance with the NWFD exemption, without causing pollution and the procedures in this manual.

It will be important that:

- All staff will have clearly defined roles and responsibilities;
- Records will be maintained of the skills required for each post; and
- Records will be maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post.

### **Staff Training Procedures**

The Council will carry out an assessment of training needs in order to meet the requirements of the procedures in the EMS.

The Council will be responsible for providing or arranging training as required.

### **Review**

Procedure review to be undertaken every 4 years or following an incident resulting in changes to procedures.

### **12.0 SITE LOG BOOK**

The Site Log Book has been designed to provide a simple and effective tool for Site Managers on the off islands to implement the EMS. It is anticipated that the Logbook is completed as required and then submitted to the Council once per month alongside the Contractor's invoices.

The Site Logbook will be produced as a carbonless copy notepad such that one copy can be kept on site and one will be issued to the Council each month.