


DOCUMENT TYPE	PROCEDURE	SOP 078	
TITLE	SAFETY STATEMENT		
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# Greenstar Limited

## Safety Statement


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## 1.0 INTRODUCTION

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

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

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

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

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

### Scope

This Safety Statement has been prepared specifically for Greenstar Ltd. and includes the following:

How the site-specific hazards present in the workplace are identified,

An assessment of the risks arising from these hazards,

How Safety, Health and Welfare in the workplace is to be ensured by deciding on any control measures,

The names and job titles of persons responsible for Safety and Health in the organisation,


General Duties of Employer and Employee,

Details of the arrangements made and resources provided for securing Safety Health and Welfare,

Details of the co-operation required from employees in Safety and Health matters,

The arrangements made for consultation with employees on Safety and Health matters,

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Details in relation to Stress, Harassment and Bullying,

Details in relation to Pregnant Employees,

Details of Health and Safety information and training available to employees,

Information on Welfare Facilities available

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## 2.0 DECLARATION OF EHS POLICY



### **Greenstar Ltd** **Environment, Health & Safety Policy**

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

Greenstar regards environmental protection and health & safety management as integral and essential parts of good business practice. It is our policy to provide a safe and healthy working environment for all our employees and persons working on behalf of the company and to achieve and maintain a high standard of environmental quality in all our operations. We also fulfill our duties to our neighbours, customers and to the wider community in terms of health & safety and environmental matters.

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

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


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

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

Signed:   
Neil Parkinson  
CEO

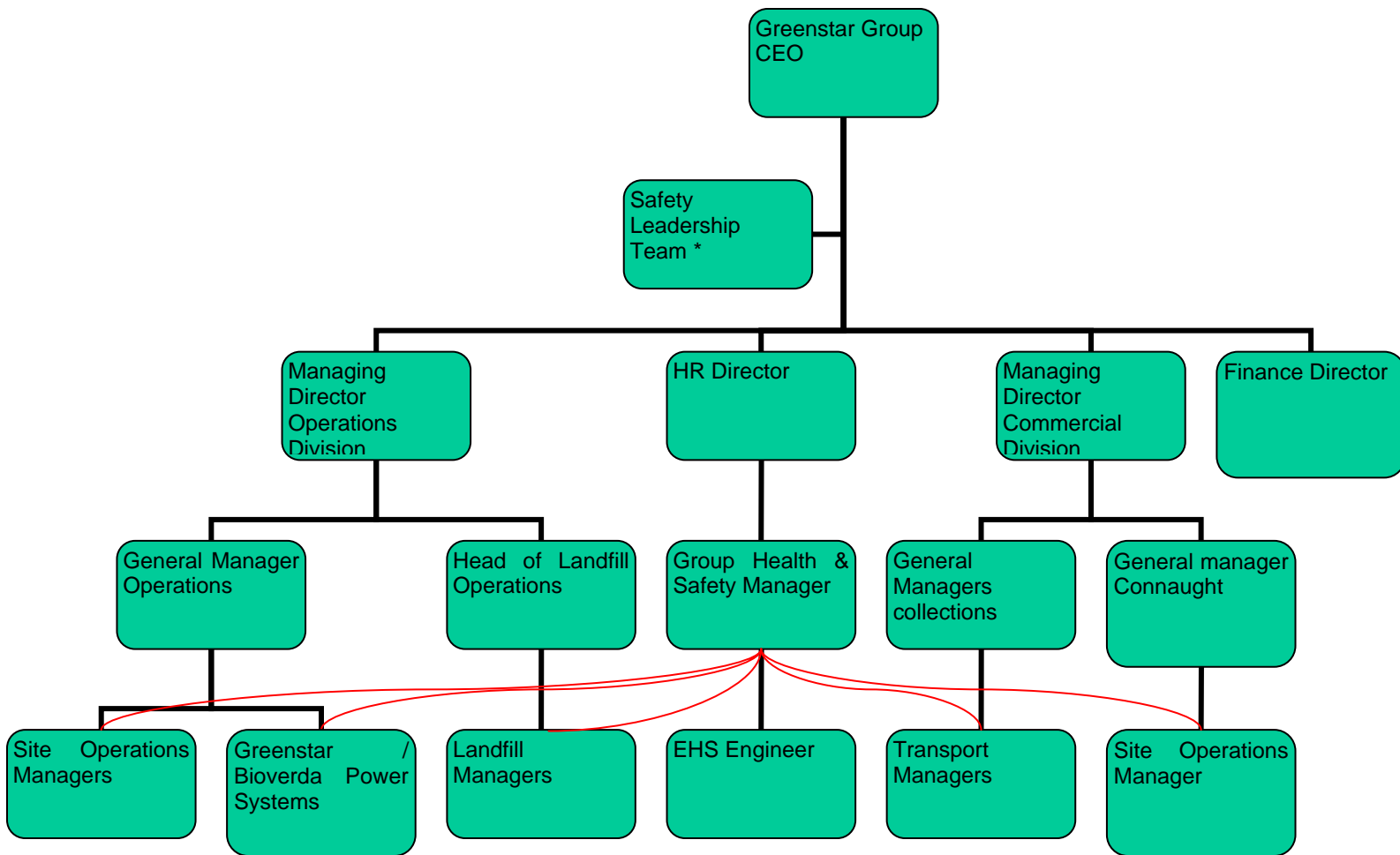
Date: 19<sup>th</sup> November 2009

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### 3.0 RESPONSIBILITIES


#### 3.1 Safety Management Organogram



— Direct link if situation requires it

\* SLT: CEO, MD Operations Division, HR Director, MD Commercial Division, Finance Director, Group Health & Safety Manager.

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### 3.2 Chief Executive Officer Responsibilities:

The CEO has overall responsibility for:

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

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### 3.3 Directors

#### Responsibilities:

Individual Directors are responsible for ensuring that:

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

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### 3.4 Group Health and Safety Manager Responsibilities:

The Group Health and Safety Manager is responsible for the creation, design, development and co-ordination of all Health and Safety programmes within Greenstar Ltd.

In particular, the Group Health & Safety Manager is responsible for:


1. Managing Safety, Environmental, Industrial Hygiene, Ergonomic and Occupational Health programmes to ensure a safe and healthy working environment for employees and community alike,
2. Working with site management on strategies for the implementation and revision of all programmes under his control,
3. Advising the company on all regulatory requirements relating to safety, health and welfare,
4. Working directly with, when required, the officers of the National Authority for Occupational Safety and Health,
5. Establishing site safety committees and other safety teams as required,
6. Creation and communication of safety, health and welfare reports, to appropriate personnel within Greenstar, and to outside regulatory agencies,
7. Maintaining detailed safety, health and welfare records in accordance with regulatory requirements as applicable,
8. Fully investigating all significant accidents, incidents and dangerous occurrences and reporting on them to the Health and Safety Authority as required,
9. Ensuring that occupational safety and health inspections or audits are conducted and that all departments are complying with the terms of the Safety Statement and the maintenance of records of such inspections,
10. Ensuring that risks are assessed and that appropriate control measures are adopted,
11. Working with site Emergency Response Team Coordinators / Fire Marshals, on evacuation procedures, fire fighting, fire drills, fire exits and compliance with fire safety regulations,
12. Ensuring that fire and emergency response drills are carried out on a regular basis to ensure a high level of familiarity with procedures,

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13. Developing and updating the company Safety Statement on an annual basis, or more frequently, if circumstances dictate,
14. Developing safe practices, procedures and safe systems of work in conjunction with relevant sites, to help ensuring the health, safety and welfare of all employees on site,
15. Issuing guidelines for the development of safety training programmes to ensure that such programmes are implemented,
16. All new facilities, plant, processes or machinery brought onto any Greenstar site conforms to the current regulatory provisions governing health and safety within Ireland.

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### 3.5 General Managers

Each manager is responsible for ensuring that all employees under their control, and others such as contractors and visitors, are made aware of and fully comply with the requirements of the company's Safety Statement and that they understand the organisational structure and arrangements present for carrying it out.

In particular, each manager is responsible for:

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

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### 3.6 Finance Director

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

#### Responsibilities:

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

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### 3.7 Human Resources

Responsibilities are to ensure that:

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

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### 3.8 General Duties of the Employer

Part 2, chapter 1, Section 8 of the Safety, Health and Welfare at Work Act 2005 states that employer's duty extends to the following:


- (a) managing and conducting work activities in such a way as to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees;
- (b) managing and conducting work activities in such a way as to prevent, so far as is reasonably practicable, any improper conduct or behaviour likely to put the safety, health or welfare at work of his or her employees at risk;
- (c) as regards the place of work concerned, ensuring, so far as is reasonably practicable
  - (i) the design, provision and maintenance of it in a condition that is safe and without risk to health,
  - (ii) the design, provision and maintenance of safe means of access to and egress from it, and
  - (iii) the design, provision and maintenance of plant and machinery or any other articles that are safe and without risk to health;
- (d) ensuring, so far as it is reasonably practicable, the safety and the prevention of risk to health at work of his or her employees relating to the use of any article or substance or the exposure to noise, vibration or ionising or other radiations or any other physical agent;
- (e) providing systems of work that are planned, organised, performed, maintained and revised as appropriate so as to be, so far as is reasonably practicable, safe and without risk to health;
- (f) providing and maintaining facilities and arrangements for the welfare of his or her employees at work;
- (g) providing the information, instruction, training and supervision necessary to ensure, so far as is reasonably practicable, the safety, health, and welfare at work of his or her employees;
- (h) determining and implementing the safety, health and welfare measures necessary for the protection of the safety, health and welfare of his or her employees when identifying hazards and carrying out a risk assessment under [section 19](#) or when preparing a safety statement under [section 20](#) and ensuring that the measures take account of changing circumstances and the general principles of prevention specified in *Schedule 3*;
- (i) having regard to the general principles of prevention in *Schedule 3*, where risks cannot be eliminated or adequately controlled or in such circumstances as may be prescribed, providing and maintaining such suitable protective clothing and equipment as is necessary to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees;

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- (j) preparing and revising, as appropriate, adequate plans and procedures to be followed and measures to be taken in the case of an emergency or serious and imminent danger;
- (k) reporting accidents and dangerous occurrences, as may be prescribed, to the Authority or to a person prescribed under [section 33](#), as appropriate, and
- (l) obtaining, where necessary, the services of a competent person (whether under a contract of employment or otherwise) for the purpose of ensuring, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees.

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### 3.9 Duties of Employees

Part 2, chapter 2, Section 13 and 14 of the Safety, Health and Welfare at Work Act, 2005 states that employees shall:

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

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

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

### 3.10 Duties of Employees based on customer sites

Greenstar employees working on all customer sites are bound by the requirements of this safety statement. The safety statement or procedures in force on that site bound also the concerned Greenstar's employees.


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#### 4.0 RESOURCES

1. Greenstar is committed to providing
  - a. Sufficient resources to implement the policy outlined in this safety statement,
  - b. Ongoing health and safety training (A health and safety training needs analysis is in place and reviewed annually for each site and a training matrix maintained),
  - c. Ongoing expenditure to maintaining the fleet, premises, plant and equipment,
  - d. Adequate time to individuals for training and administration of their Health and Safety duties; this includes Safety Reps, Safety Committee members, Fire Wardens etc.
  
2. Greenstar accepts that
  - a. The implementation of the safety management programme is dependent upon the provision of resources,
  - b. This safety statement sets out the resources in terms of time and people provided to secure the Safety, Health and Welfare of employees,
  - c. Considerable resources in securing the safety, health and welfare of employees in terms of personnel, time, materials, equipment and training are allocated,
  - d. Where significant amount of expenditure is required, resources may have to be allocated on a phased basis,
  - e. When required, Greenstar will engage external consultancy services,
  - f. Where new hazards are identified, Greenstar, in so far as is reasonably practicable, will provide for additional resources to control them,
  - g. Health & Safety information is also transmitted through safety bulletins, staff newsletter and team toolbox talks,
  - h. Staff is provided with the appropriate personal protective equipment.

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#### 4.1 Budgeting for Health and Safety

The Group Health & Safety Manager shall prepare an annual Health and Safety budget.

This budget shall make provision for

- Resources internal and external (personnel, external consultants etc.),
- Training,
- Certification,
- Benchmarking,
- Occupational exposure monitoring,
- Legal briefings,
- Incident and Injury Free Programme,
- Seminars,
- Other...

Each General Manager will also include specific Health Safety items in their annual budget.

Provision should be made for


- Occupational health activities (inoculations, occupational health screening and consultations),
- Accident and emergency costs,
- First aid equipment and supplies,
- Statutory audits and inspections of equipment,
- Fire fighting equipment and refills,
- Health and Safety signage,
- Personal protective equipment.

#### 4.2 Capital Expenditure

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

- mitigating hazards identified in a Risk Assessments,
- any upgrade or change required for any Emergency Response Plan,
- the scheduled replacement of old or sub-standard vehicles, mobile or static plant and equipment.

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## 5.0 SAFETY MANAGEMENT

### 5.1 Safety Management Programme

Greenstar manage Health and Safety within the organisation by continuously monitoring and reviewing performance.

The Safety Leadership Team sets the Health & Safety Objectives annually and reviews them quarterly. Some performance indicators are included in the setting of objectives. These indicators are:

- Near misses,
- Accidents and incidents,
- Non conformances,
- Risk assessments,
- Direct observation,
- Safety Audits,
- Suggestions / feedback with operatives,
- Best practice within the industry,
- ...

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

Responsibility for the execution of any required actions is allocated to designated personnel and or organisation.

Appropriate time scales/ deadlines are allocated to any proposed actions.

### 5.2 Safety Committee

Every site or operation implement Safety Committees, to assess the on-going progress of the safety management programme, as set out in the safety statement.


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

A minimum of four members shall be required to form a quorum (50% staff, 50% management)

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

Minutes from the meeting are posted on notice boards.

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### 5.3 Safety Committee - Terms of Reference

- a) Review :
  - a. implementation of the safety management programme on site, as set out in the safety statement,
  - b. allocation of resources on site,
  - c. accident/incident trends for the site,
  - d. safety and health training requirements for the site,
- b) Analysis and review corrective measures,
- c) Make submissions to Management directly or through safety representative on behalf of staff,
- d) Make recommendations where appropriate,
- e) Report on the implementation of the safety management programme,
- f) Review the safety management system with a view to drive continuous improvement

### 5.4 New Employees

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

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


During their first week of employment, the Area Manager shall ensure that new employees:

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

### 5.5 Pre employment checks

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

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## 5.6 Responsibilities of Contractors, Self-Employed and Visitors to Greenstar

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

### 1. Contractors must:

- a. Submit their safety statement and / or method statement before commencing any activity, for approval, to the Health and Safety Department. This document will set out the site-specific safety precautions required while carrying out work on any of the Greenstar facilities.
- b. Check if their activity may be subject to the particular sites permit to work system,
- c. Familiarise themselves with the site safety rules, evacuation plans and emergency procedures,
- d. Confine them to the work area. If there is a requirement to work outside the site, inside the tenant areas, the site Operations Manager must be informed.
- e. Take all precautions, so far as is reasonably practicable, to avoid any risk to themselves or anyone who may be affected by their acts or omissions,
- f. Provide full and clear information to those who may be affected by their work activities, so as to reduce their exposure to risk,
- g. Follow all instructions and comply with all safety rules, evacuation plans and emergency procedures,
- h. Provide adequate instruction, supervision, personal protective equipment and ensure that all relevant regulations and codes of practice are observed,
- i. Report any accidents or near-miss incidents to the site Operations Manager or Safety Officer without delay and co-operate in any subsequent investigation of the accident or incident,
- j. Leave all plant and equipment in a safe condition after work completion. They must clean up and remove all materials and equipment belonging to them.

### 2. Contractors must not:


- a. Use tools or equipment, which are the property of Greenstar without prior permission of the site manager,
- b. Seek the assistance of Greenstar's employees without prior permission of the site manager.

### 3. Visitors must:

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

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

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## 6.0 CONSULTATION

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

Section 26 (1) of the Act states that:

It shall be the duty of every employer

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

Section 26 (2) of the Act states that:

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

This representation may be made through the Safety Representative, The Safety Committee or on an individual basis directly to management.

Matters relating to safety should always be discussed initially with the appropriate Supervisor/Manager. Items may be referred to the site Safety Representative or the Safety Committee when, in the opinion of the employee, the initial response of management is felt to be unsatisfactory, or when corrective action agreed by management is not implemented within a reasonable time.


### 6.1 Safety Consultation

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

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

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

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This representation may be made through the site Safety Representative, the Safety Committee or on an individual basis.

Greenstar through the site Safety Committee, will annually review the effectiveness of the consultation /communication process.

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

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

Greenstar has established site Safety Committees, whose function it is to discuss the progress of the safety management programme set down in the Safety Statement. The Safety Representatives are members of these committees. The Safety Committees enable management and employees to consult each other on all aspects relating to safety, health and welfare at work.

## 6.2 Safety Representative

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


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

The safety representative has the right to such information from Greenstar as is necessary to ensure, so far as is reasonably practicable, the safety and health of employees at the place of work.

Greenstar will take such steps as are practicable to inform the safety representative when an inspector of the Health and Safety Authority (HSA) enters the workplace for the purpose of making a tour of inspection, (other than a tour of inspection for the purpose of investigating an accident).

**The site safety representative will be a member of the site Safety Committee.**

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The safety representative may:

- a) Make representations to the department head or safety committee.
- b) Investigate accidents and dangerous occurrences provided that he or she does not interfere with or obstruct the performance of any statutory obligation required to be performed by any person under any of the relevant statutory provisions.
- c) After the giving of reasonable notice to the employer, investigate complaints relating to safety, health and welfare at work made by any employee whom he or she represents.
- d) Accompany an inspector who is carrying out an inspection of the place of work under *section 64* other than an inspection for investigating an accident or dangerous occurrence.
- e) At the discretion of the inspector concerned, accompany an inspector who is carrying out an investigation under *section 64* for investigating an accident or dangerous occurrence.
- f) At the discretion of the inspector concerned, where an employee is interviewed by an inspector with respect to an accident or dangerous occurrence at a place of work, attend the interview where the employee so requests.
- g) Make representations to the employer on any matter relating to safety, health and welfare at the place of work.
- h) Make oral or written representations to inspectors on matters relating to safety, health and welfare at the place of work, including the investigation of accidents or dangerous occurrences.
- i) Receive advice and information from inspectors on matters relating to safety, health and welfare at the place of work, or
- j) Consult and liaise on matters relating to safety, health and welfare at work with any other safety representative who may be appointed in the undertaking concerned, whether or not those safety representative work in the same place of work, in different places of work under the control of the employer or at different times at the place of work.


It is important to be aware that the Elected Safety Representative supports the safety and well-being of all staff.

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

Greenstar shall consider any representations made by the safety representatives on any matter affecting the safety, health and welfare at work of any employee whom s/he represents.

For the purpose of acquiring the knowledge and training necessary to discharge his/her function as a safety representative, s/he shall be granted time off from his/her duties as may be reasonable without loss of remuneration.

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Greenstar shall grant the safety representative such time off from his/her duties as determined by the department head, without loss of remuneration in order to discharge his/her function as a safety representative.

The safety representative is a member of the Safety Committee. As a member, it is his/her function to put forward any representations or recommendations on behalf of the staff on the subject of safety, health and welfare at work.

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

### 6.3 Information

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

All staff members are provided with a copy of the appropriate sections of safety statement and any revisions as applicable.


Copies of the minutes of the meetings of the Safety Committee will be displayed on the safety notice boards.

Safety notices are placed in prominent positions throughout Greenstar facilities and staff should read these carefully.

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

The safety statement will be available on the Greenstar Intranet.

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## 7.0 ACCIDENTS & EMERGENCIES

In the event of a personal injury on site, take the following steps:

If the injured person is immobilised the emergency services should be contacted immediately. A first aider should be called to the scene and the injured party made as comfortable as possible pending the arrival of the emergency services.

The site Operations Manager and the Site Safety Officer should be contacted immediately and informed of the incident. They in turn should inform the General Manager and the Group Health & Safety Manager.

If the injured party is mobile, they should be removed immediately to a place of comfort and safety (e.g. canteen or office) and a first aider should be called to assist. The first aider should assess the injury and inform the supervisor if the injured party can be treated on site or if it is necessary for them to go to Accident & Emergency. Contact immediately and inform of the incident the site Operations Manager and the Site Safety Officer. They in turn should inform the General Manager and the Group Health & Safety Manager.

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

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

### 7.1 Accident and Near Miss Reporting

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


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

The Operations Manager/Senior Manager or Site Safety Officer must insure that the Incident/Accident report form (GS 029) is completed and sent to the Health & Safety Manager with copies to HR and Finance (Insurance section) within 24 hours.

It is important to monitor the accidents and near misses that occur within the confines of any of the Greenstar facilities.

In the case of an accident involving injury however slight an employee must report it immediately to their supervisor and give full details. Greenstar will investigate the

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circumstances of accidents and determine their cause. Employees will be encouraged and expected to co-operate fully with such investigations. Staffs have a responsibility to report as soon as possible any accident or emergency to the Supervisor/Manager.

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

In the case of a dangerous occurrence (defined below) or if injury occurred as a result of the accident that necessitates the injured party to be absent from work for more than three days then it is the responsibility of the Health and Safety Manager to ensure that the form **IR1** form is completed and forward to the HSA.

Copies of all completed Accident/Incident Report Forms will be sent to the following:

- Injured party,
- Health and Safety Manager,
- Human Resources,
- Finance.

All accidents and near misses will be recorded in an accident database.

**Copies of accident/incident reports will also be maintained on each site for inspection as required.**

## 7.2 Accident Investigation

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


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

The purpose of any investigation will be to:

1. Determine the root cause of the accident,
2. Identify any other contributory factors,
3. Determine the steps to be taken to prevent reoccurrence.

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

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


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

### 7.3 Dangerous occurrence

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

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

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## 8.0 WELFARE

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

To this end, Greenstar provides the following facilities:

### 8.1 Welfare

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

- Adequate Hygiene Facilities,
- Adequate Canteen Facilities,
- Access to Medical Facilities/Personnel,
- Pre-employment medicals,
- Inoculations as appropriate,
- Availability of trained First Aiders,
- Monitoring of Attendance and Absenteeism.

Washing, toilet/shower and cloakroom facilities are provided in each site/work area.


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

### 8.2 First Aid

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

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


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### 8.3 Drugs, medication and alcohol

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

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## 9.0 PREGNANT EMPLOYEES

Greenstar is aware of its obligations, under Safety, Health and Welfare at Work Legislation in relation to pregnant employees and those who may be breast-feeding or have recently given birth.

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

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

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

### 9.1 Preventative Actions


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

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

### 9.2 Notification by the Employee

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

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## 10.0 HARASSMENT & BULLYING

### 10.1 Definition

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

### 10.2 Policy

Greenstar will not tolerate bullying behaviour.

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

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

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

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

Contact Human Resources for more details on the company bullying policy.

### 10.3 Effects


The effects of bullying on the person can be manifested by any or all of the following:

- Emotional effects (fear / anxiety)
- Cognitive (concentration) effects (making mistakes, having accidents)
- Behavioural effects (smoking, excess drinking, overeating)
- Physiological effects (contributing to raised blood pressure, heart disease)
- Reduced resistance to infection, stomach and bowel problems and skin problems.
- Depression possibly leading to more serious consequences

The effects on the organisation as a whole:

- Increased absenteeism
- Low motivation
- Reduced productivity
- Reduced efficiency
- Hasty decision-making
- Poor industrial relations.

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#### 10.4 Forms of Bullying

Greenstar recognises the following behaviour as forms of bullying:

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

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## 11.0 STRESS

### 11.1 Definition

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

### 11.2 Policy

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

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

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


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

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

### 11.3 Effects

- Changes in a persons behaviour
- Deteriorating relationships
- Irritability
- Indecisiveness
- Absenteeism
- Reduced Performance

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## 12.0 HAZARD IDENTIFICATION & RISK ASSESSMENT

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

Site-specific risk assessments are carried out across the Group and Safe Operation Procedures (SOP's) are written based on the results of those risk assessments.

The risk assessment must be written and updated annually or when there is a significant change in the workplace.

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

Risk assessments are available for inspection at each site.

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

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


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

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

### 12.1 Responsibility:

The General Manager on each site is responsible for ensuring that risk assessments are carried out and updated. This will be done annually or where there is a change in operations, process, best practice, legislation or as a result of corrective actions arising from non-conformities found during audits.

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## 12.2 Methodology

Hazard identification and risk assessment is a methodology to improve safety in the workplace. This methodology involves:

1. An analysis of each work place: to identify all the different hazards (physical, chemical, biological),
2. An assessment of the risk from these hazards,
3. Implementation of control measures to eliminate or reduce the risk to an acceptable level,
4. Implementation of control measures must be completed as per the timescale outlined in the risk assessment method (Hazard Risk Number),
5. Responsible persons will be assigned to all controlled measures identified by risk assessment.

### **New process / Equipment**

Where there is a requirement to purchase new equipment or carry out a new task a pre operational risk assessment will be carried out. The objective of this exercise will be to strive for continuous improvement and to design out any possible hazards in the new work system.

Where possible new equipment will be ordered and designed to incorporate improved design features which have become apparent through experience and use of similar equipment on this and other sites.

New plant or equipment will be tested and trailed by appropriate manager / engineer. Where required the services of a competent expert will also be obtained. All new equipment will conform to the appropriate industry standards and where appropriate be CE marked.

### **Assessment Methodology**


For each Hazard the level of risk is assessed. The Hazard Risk Number rating system is used. (HRN)

1. What is the Probability of Exposure (PE)?

There are six possibilities. A numerical value is attributed to each possibility.

0.5	→	Very Unlikely
01	→	Unlikely
02	→	Possible
05	→	Even Chance
08	→	Probable
10	→	Likely
15	→	Certain

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2. What is the Frequency of Exposure (FE)?

There are seven possibilities. A numerical value is attributed to each possibility.

- 0.1 → Infrequently
- 0.2 → Annually
- 1.0 → Monthly
- 1.5 → Weekly
- 2.5 → Daily
- 4.0 → Hourly
- 5.0 → Constantly

3. What is the Number of Persons exposed (NP)?

There are five possibilities. A numerical value is attributed to each possibility.

- 01 → 1-2 person(s)
- 02 → 3-7 persons
- 04 → 8-15 persons
- 08 → 16-50 persons
- 12 → more than 50

4. What is the Maximum Probable Loss (MPL)?

There are seven possibilities. A numerical value is attributed to each possibility.


- 15 → Fatality
- 08 → 2 Limbs/Eyes/Serious Illness (P)
- 04 → 1 Limb/Eye/Serious Illness (T)
- 02 → Major Break/Minor Illness (P)
- 01 → Minor Break/Minor Illness (T)
- 0.5 → Laceration/Mild Ill health
- 0.1 → Scratch/Bruise

**PE \* FE \* NP \* MPL, determine a Hazard Risk Number (HRN)**

Less than 005	Very Low Risk	Low Risk
006 to 010	Low Risk	Low Risk
011 to 050	Significant Risk	Medium Risk
051 to 100	High Risk	High Risk
101 to 500	Very High Risk	High Risk
501 to 1000	Extreme Risk	High Risk
Over 1000	Unacceptable	High Risk

The HRN and the category of the risk, will determine which hazard is the most critical. Dependent on severity appropriate mitigation will be applied in order to improve the level of safety and decrease the HRN.

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Dependant on the severity of the risk, remedial action must be taken within the designated time scale detailed below:

- Low Risk                   =>    6 to 12 months to review or eliminate the risk
- Medium Risk           =>    3 to 6 months to review, reduce or eliminate the risk
- High Risk               =>    as soon as we can or up to 3 months to review, reduce or eliminate the Risk
- Unacceptable risk   =>    the operation will be stopped immediately.

A colour code has been implemented for the principal risk categories:

- Green for Low Risk
- Orange for Medium Risk
- Red for High Risk

Where control measures are to be implemented a responsible person or organisation will be designated to carry out the task within the appropriate time scale. The risk assessment register will be updated and a record of same maintained.

### 12.3 Review


The risk assessments need to be reviewed:

- on an annual basis,
- as a result of the introduction of new operations or personnel,
- as a result of accidents, incidents or non-conformances,
- changes in legislation, codes of practice or best practice.

### 12.4 Communication

Where there is a requirement to modify a procedure personnel will be issued with a written copy of same and receive direct instruction from there department manager or Site Manager. Documentation will be updated and where required the issue will be discussed as part of the regular site safety meetings.

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## 12.5 Sub contractors

Some of the equipment on site requires maintenance or repair by specialist sub contractors. Where necessary, sub contractors may be required to complete the site induction before being allowed to carry out any works on-site. All contractors are subject to the site “permit to work” system and emergency procedures. Specific safety instruction procedures will be included with the issue of these permits.

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

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### 13.0 PERSONAL PROTECTIVE EQUIPMENT

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

#### The personal protective equipment will:

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

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

Where P.P.E. is used, the employee will:

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


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

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

The department manager is the person responsible for completing the assessment, maintaining the equipment and providing instruction and training.

**It is the duty of every person issued with PPE to wear and use it.**

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## 14.0 FIRE SAFETY

It is Greenstar's policy to ensure the safety of staff through the implementation of an Emergency Response Plan at each site.

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

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

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


The Emergency Response Plan is concerned with the proper upkeep of systems and fire safety measures, the provision of information on fire safety measures, and the institution of good housekeeping arrangements.

### Legal Requirements

Greenstar is committed to fulfilling its statutory obligations.

To this end Greenstar complies with the current statutory requirements and envisages an on-going programme of continuous improvement of the company's safety performance.

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## 15.0 TRAINING AND INSTRUCTION

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

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

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

### Induction course

All new employees must receive Safety, Health and Induction Training.

This will include information on and an introduction to Greenstar. The following topics will be covered:

- Manual handling,
- Safety Policy and Safety Statement,
- Safety Representative and Safety Committee,
- Policy on Fire Prevention and Emergency Evacuation procedures,
- Welfare facilities (canteen, toilets etc.),
- The location of the First Aid/Medical Centre,
- Smoking Policy,
- Accident reporting procedure,
- Housekeeping.

The induction course will also include an explanation of the duties imposed by the Health and Safety Legislation which affects the individual to include:

- General Duties of Employers,
- General Duties of Employees.


Resources are spent on the provision of training in a variety of areas related to safety and health at work.

General Managers are responsible for:

- a) identifying staff in need of training or refresher courses.
- b) ensuring staff receive appropriate instruction/training in standard work practices.
- c) identifying work situations which require instruction/training of staff.

All new equipment will be assessed by a competent person in order to identify any training implications and shall devise appropriate safety arrangements where necessary.

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On-site contractors receive appropriate instructions relating to any risks to safety and health that they may encounter during their work activities on Greenstar facilities.

#### Continuous Safety Health and Welfare Training All Employees

Health & Safety training shall be arranged as required, based on changing operating conditions, staff requirements and because of ongoing risk assessments.

Current training programmes in place include:

- Managing Safely
- Supervising Safely
- Safety Representative
- UCD & FETAC Certificate
- General Induction
- Landfill Induction
- Evacuation
- Manual Handling
- Ergonomic set up VDU workstation.
- Fire Fighting
- Spill training
- Chemical handling.


#### Work Activities

- Collection helper
- Driver Safety Awareness
- HGV Driver Assessments and Advanced driver training
- Skip Truck and Hook loader operator training
- REL Operator training
- Machine driver
- Forklift driver
- Static plant operation
- Use of PPE

#### Specialist Training

- Lockout / Tagout
- Working at Height
- Harness use of
- Confined space
- First Aid
- CPR

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## 16.0 DISCIPLINARY ACTION

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

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

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


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

OR

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

**Disciplinary procedures will be in line with what is already in place and detailed in employees' contracts of employment and the employee handbook.**

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## 17.0 EMERGENCY PLAN

All Greenstar sites will have prepared an Emergency Response Plan to ensure a co-ordinated site response to all foreseeable dangerous occurrences and emergencies.

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

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

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

## 18.0 SAFETY STATEMENT REVISION

Greenstar will, taking into account any risk assessments carried out, review the safety statement where:

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

and, following the review, Greenstar shall amend the safety statement as appropriate.

## 19.0 DIRECTORS REPORT

Greenstar will prepare or have prepared an annual Health & Safety Report for inclusion in the companies Annual Board Report.

Issues arising in the Annual Health & Safety Report will be included in the Goals & Objectives set by the Board of Directors for the coming year.

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