



# Cambrian Printers' Integrated Review 2009

A review of the company's environmental performance and integrated procedures with evaluation against objectives, targets and year-on-year figures.

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Authorised by  
*R. H. Read*  
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Managing Director

## 1. Environmental Statement

Established in 1860 - Cambrian Printers is a family owned business that prides itself on high quality service and technical excellence making us the printer of choice for a number of the world's top publishers of journals and books, magazines, catalogues and digital print-on-demand products.

The fourth generation of the Read family now own the business which was originally founded by Sir John Gibson.

Cambrian Printers moved into their new premises in Llanbadarn on the outskirts of Aberystwyth over ten years ago and continue to expand on this site.

The Company's premises are situated on a small industrial site within the Aberystwyth suburb of Llanbadarn. The Cambrian railway line and the river Rheidol, which flows into Cardigan Bay, lie approximately ¼ mile to the south. The site was previously used as a clothing factory, bowling alley and furniture warehouse. Cambrian Printers has extended the property to the rear with a 2 story connecting block and have purchased additional warehouse space with access from the company's yard. Compacting on site is in operation under an exemption notice. There is no record or history of land contamination.

There is no record or history of land contamination. The site was originally a furniture warehouse.

Cambrian Printers installed a HP 5000 Indigo press as part of a major upgrade of their digital capability. The press has been installed as part of a drive to establish digital printing as 10% of turnover, in addition to its existing litho business.

The new six-colour Indigo digital press joins an existing mono digital press to provide short run and variable data colour print, as well as proofs and products for market testing.

The majority of Cambrian Printers' work is lithographic printing of commercial brochures, academic journals and high quality catalogues. The improved digital capability will mean that some of this work could be considered for digital production, using the extended CMYK colour gamut, reducing turnaround times, printing costs and waste.

The company believes that, if not controlled carefully printing can be an extremely wasteful process. Cambrian Printers is committed to limiting the impact of the print and related processes on the environment. Less wastage makes good business sense by using technology to promote savings on materials, resources and time.

The company employs over 90 people in a variety of production roles as well as administration and sales operations.

Our main raw materials are paper, ink and aluminium plates. A range of volatile organic chemicals are used in production and in cleaning production equipment in

compliance with CoSHH regulations.

The factory and office buildings have been fitted throughout with low energy lighting after an energy efficiency survey by Scottish Power. There have been many resource saving initiatives and waste minimisation programmes.

The company has not had any major environmental incidents and there have not been any convictions under any environmental legislation.

## 2. Environmental Policy

Cambrian Printers first established in 1860, is a fourth generation family owned business. The company moved into its new premises in Llanbadarn on the outskirts of Aberystwyth over ten years ago and continues to expand on this site, with lithographic printing, digital printing and an extensive print finishing department.

Control measures and pollution prevention procedures are in place to deal with the quantities of solvent and chemicals which are stored on site.

Our aim is to achieve customer satisfaction through fulfilling our stakeholders' requirements first time, every time. In all our activities, we will continuously work towards reducing our impacts on the environment and improvement of our products and services, by:

- Compliance with all legislation relevant to our business
- Training staff in the importance of environmental awareness
- Measurement and regular review of our materials and energy usage
- Commitment to reduction of the pollution hazard and emissions from site operations
- Reduction of energy wastage
- Continued compliance with environmental standards
- Continual improvement of the effectiveness of our processes
- Continuing controlled growth as a family-owned business on a single site in Aberystwyth
- Continually enhancing and developing our expertise and competency to ensure we maintain a position at the forefront of professional excellence within the industry
- Continuing investment in machinery and systems to maintain a competitive advantage in our chosen markets

The policy will be implemented by incorporating quality and environmental awareness into the day-to-day running of our business and by active participation of staff in all such projects. Objectives and targets for improvement will be set and reviewed by management at least once a year.

Evaluation has identified raw material usage, waste to landfill and energy usage as key environmental issues in need of monitoring. Evaluation of compliance with legislation is maintained through regular audits and reviews.

Records and monitoring data will continue to be updated and retained for inspection.

All employees are committed to provide quality of service, meet legal obligations and ensure the protection of the environment. This policy will be communicated to all staff and reviewed on a regular basis. The policy will be made available on the company website.

### **3. Integrated Policy**

Our aim is to achieve customer satisfaction through fulfilling our stakeholders' requirements first time, every time. In all our activities, we will continuously work towards reducing our impacts on the environment and improving the quality of our products and services, by:

#### *General*

- Compliance with all legislation relevant to our business
- Continual improvement of the effectiveness of our processes
- Continuing controlled growth as a family-owned business on a single site within Aberystwyth
- Honesty and fairness to staff, customers and suppliers in order to develop long-term partnerships
- Respect for and acknowledgement of people's contributions
- Integrity in all dealings with employees, customers, suppliers and financial supporters
- Best Practice in providing equal opportunities for all and compliance with all relevant legislation
- Responsiveness to our employees' and their families' needs
- Continually enhancing and developing our expertise and competency to ensure we maintain a position at the forefront of professional excellence within the industry

#### *Environment*

- Continued compliance with national and international standards
- Training staff in the importance of environmental awareness
- Measurement and regular review of our materials and energy usage
- Reduction of the potential pollution hazard from site operations
- Continued commitment to best practice in waste management and recycling

#### *Energy*

- Commitment to implementing energy reduction measures
- Continued development of Energy Group projects and initiatives
- Commitment to energy audits and analysis

#### *Quality*

- Ensuring, through procedures and practices consistent improvements in product quality
- Ensuring best practice to reduce spoilage and waste
- Continuing investment in machinery and systems to maintain a competitiveness in the industry
- Continued compliance with ISO 9001
- Employing skilled staff with access to continuing development to achieve improved product quality

#### *Health & Safety*

- Continued observation of Health and Safety at Work Act 1974 and associated regulations
- Continuing commitment to provide a safe working environment for all employees and visitors
- Maintenance of a high level of good housekeeping practices
- Commitment to risk assessment and best practice in managing risks and adoption of best practices
- Analysis of accident trends within the management system through audits and reviews

This Policy will be achieved by incorporating these points into the day-to-day running of the business and by active participation of staff in all projects and initiatives. Objectives and targets for improvement will be set and reviewed by management at least once a year.

Evaluation of compliance with legislation is maintained through regular audits and reviews. Records and monitoring data is updated and retained for inspection.

The co-operation of all employees is necessary to provide quality of service, meet legal obligations and ensure the protection of the environment.

This policy will be communicated to all staff and reviewed on a regular basis. The policy will be made available on the company website.

### **4. Environmental Impact**

Environmental impact is assessed and re-assessed using a risk assessment system of quantitative risk. Each area of environment concern is assessed to analyse the actual and potential impact the company's activities are having on the local and global levels.

Training, initiatives and projects are featured in the relevant response to the identified risks; the priority of the response is determined by a scoring system designed to highlight the greatest need for action. These actions are targeted through measurable objectives and a timetabled action plan. A senior manager is responsible for the objective.

### **5. Equal Opportunities Policy**

It is Cambrian Printers' Ltd policy to promote equality of opportunity in employment regardless of sex, marital status, race, colour, nationality, ethnic or national origins, sexual orientation, disability and perceived religious or political affiliation.

The company's recruitment and selection procedures positively support this aim of a diverse workforce. All candidates are considered strictly on their merits in relation to the selection criteria for the job. We aim to treat all candidates fairly and consistently and be responsive to their needs throughout the recruitment, selection and appointments process.

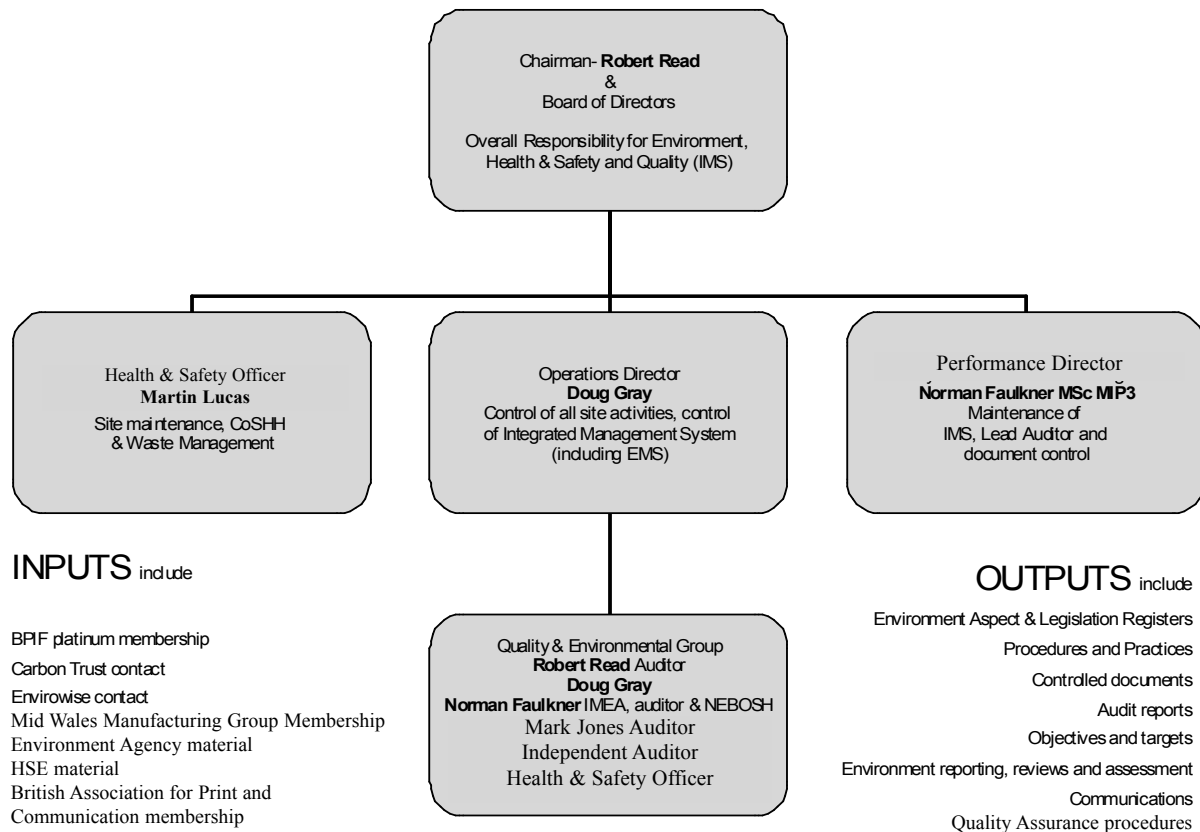
The objectives of this policy are to:

- Ensure that the company has access to the widest labour market and secures the best employees for its needs.
- Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, they are given the help they need to attain their full potential to the benefit of the company and themselves.
- Achieve an ability-based workforce which is in line with the working population mix in the relevant labour market areas.

The co-operation of all employees is essential for the success of this policy. However, ultimate responsibility for achieving the policy's objectives, and for ensuring compliance with the relevant Acts of Parliament as well as the various Codes of Practice, lies with the company.

Behaviour or actions against the spirit and/or the letter of the laws on which this policy is based will be considered a serious disciplinary matter.

## 6. Hierarchy of Integrated Management



## 7. Structure and Responsibility

Roles, responsibility and authorities are defined, documented and communicated in order to facilitate effective Integrated Management.

The company has provided resources essential to the implementation and control of the management system. Resources include human resources and specialised skills, technology and financial resources.

The company have appointed specific management representative(s) who, irrespective of other responsibilities, have defined roles, responsibilities and authority for;

- ensuring that management system requirements are established, implemented and maintained in accordance with national or international standards;
- reporting on the performance of the Integrated Management System to senior management and directors for review and as a basis for improvement of the management system.

## 8. Operational Control

The company has identified those operations and activities that are associated with the identified significant environmental aspects in line with policy, objectives and targets. The company plan these activities, including maintenance, in order to ensure that they are carried out under specified conditions by;

- establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from policy and the objectives and targets;
- communicating relevant procedures and requirements to suppliers and contractors.

## 9. Document Control

The company has established and maintains procedures for controlling all documents required by national and international standards to ensure that;

- they can be located;
- they are periodically reviewed, revised as necessary and approved for adequacy by authorised personnel;
- the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the management system are performed;
- obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use;
- any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.

Documentation shall be legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities shall be established and maintained concerning the creation and modification of the various types of document.

## 10. Records

The company has established and maintains procedures for the identification, maintenance and disposal of all records. These records include training records and the results of audits and reviews. All records are legible, identifiable and traceable to the activity, product or service involved. Records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times have been established and recorded.

## 11. Structure of Cambrian Printers' Integrated Management System

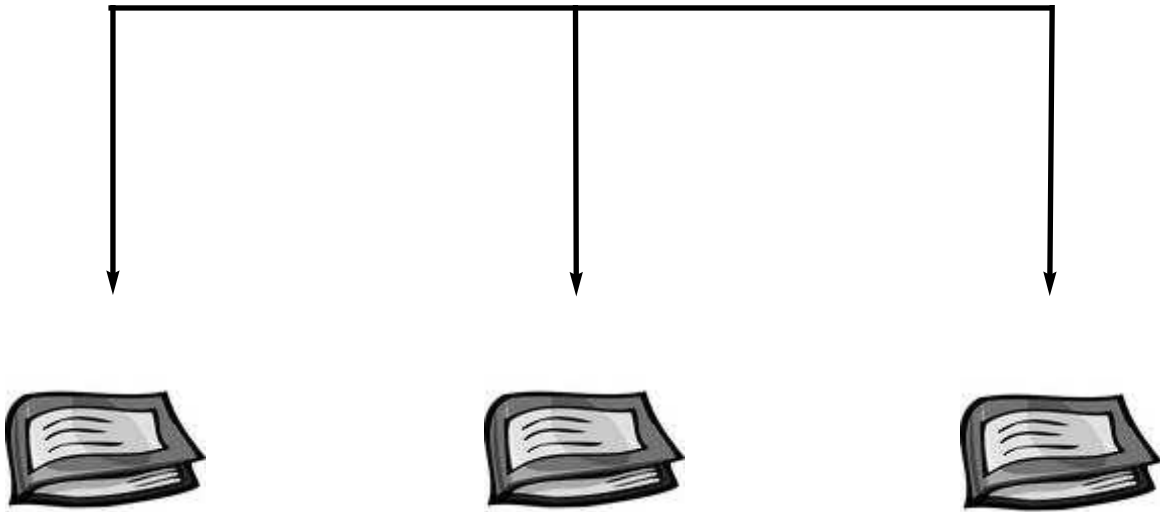
### Quality, Environment and Health & Safety

#### **Input requirements**

*Legislation, Regulations and Codes of Practices*

*Policies, Statements and Procedures*

*Management System documents, National and International Standards, Guidelines and Best Practices*



#### **Standard Working Practices**

Authorised by Managing Director, issued and controlled by Operations Director.

#### **Organagrams and Structures**

Authorised by Managing Director, issued and controlled by Operations Director. Reviewed and Audited by Performance Director.

#### **Policies, Statements, Initiatives and Fundamental Procedures**

Authorised by Managing Director, issued and controlled by Operations Director. Audited by Performance Director.

#### **Flowcharts and Standard Agenda**

Authorised by Managing Director, issued and controlled and audited by Performance Director.

#### **Health & Safety and Environmental Risk Assessments**

Authorised by Managing Director, issued and controlled by Health & Safety Officer and audited by Performance Director.

#### **Departmental Instructions and Local Procedures**

Issued by departmental managers as necessary.

#### **Logs, Records and Shuttleworth MIS Functions**

Issued and controlled by Operations Director and Commercial Manager. Reviewed and Audited by Performance Director.

#### **Quality Assurance Material and Maintenance Forms**

Issued and controlled by Operations Director and Maintenance Manager. Reviewed and Audited by Performance Director.

#### **Reports and Analysis**

Commissioned by Director level as necessary by best available source. Internal and external input as required.

## **12. Quality**

The company's Quality System can be defined as a set of policies, processes and procedures required for planning and manufacturing process at the core areas of our business. Quality integrates all the various internal processes within the company and intends to provide a process approach for product production. A detailed Quality System enables the organisation to identify, measure, control and improve the various core business processes that will ultimately lead to improved business performance, across all aspects of the Integrated Management System.

Within the Quality System is a commitment to Quality assurance, which provides the evidence needed to establish quality in work, and that activities that require good quality are being performed effectively. All the company's planned and/or systematic processes are deemed necessary to provide confidence that a product or service will satisfy the given customer requirements for quality and company procedures.

## **13. Quality Policy**

Cambrian Printers Ltd specialises in the production of high quality offset lithographic and digital printing with supporting prepress and finishing operations. Quality Assurance is an integral part of all the printing undertaken. The Company mission is:

"To produce all work to an agreed specification within an agreed timescale at an agreed price".

This means continual improvement in the control of processes and the prevention of errors, leading to continued customer satisfaction. We aim to produce work in a way which conforms to the requirements of our Customers, the Company and the applicable regulatory authority. Every single member of staff is required to adhere to the Quality Assurance System at all times. Senior management regularly review the system.

The terms of our quality registration will make us subject to surveillance visits by assessors from an accredited certification body. The System incorporates the essential elements for effective Quality Assurance as set out in ISO 9002.

## **14. Quality Trail**

Every operation is signed off, good and waste copies are recorded for further analysis. This data is retained by the company for 2 years.

## **15. Quality Assurance Procedures**

At each stage of the production process a pass sheet must be signed off by the operator responsible for that process. Further running pass copies at 25%, 50%, 75% and at 100% will be signed off by the operator as appropriate. All these copies will be placed in the job bag (if needed additional bags will be issued to ensure all copies are saved for inspection). Inspection of work is undertaken at frequent intervals throughout the production process above and beyond the QA procedures requirements but these samples are not saved as part of the formal QA procedures.

## **16. Quality Assurance Sampling**

On the completion of printed work the job instructions and QA samples are forwarded to the Commercial Department. The Commercial Director or the Commercial Manager selects on a weekly basis 10% of all completed work which represent a cross section of various styles. These selected jobs are reviewed by the Systems & Technical Manager, who reports the findings to the Operation Director and the management team. The Operation Director holds review meetings to action the necessary response to the findings.

## **17. Quality Assurance Spot Checks**

The company's departmental managers carry out in-process testing of quality and procedures, on a weekly basis. These check lists are reviewed at director level and analysed to further aid quality management.

## **18. Customer Satisfaction Survey**

The company aim to hold a Customer Satisfaction Survey at 2 yearly intervals to include all customers that have placed a job with the company within the previous 2 years. In the 2005 survey; Product quality was the highest scoring factor with our customers, just ahead of Helpfulness of Staff and Accuracy of Estimates. Marked out of 5, the average score for all 10 questions did not fall below 3.9. In the 2008 survey all areas showed an improved response with the average

## **19. Quality Awards**

The company has won the following Quality Awards:

HP Indigo Progressive Print Award 2008 - Best Digital Print Product

BPIF British Book Design & Production Awards 2007 - Digital Award Winner

Digital Printer Awards 2007 - Marketing Collateral Winner  
Shout 07 - Environmental Printing Award

## **20. Memberships**

BPIF Platinum Membership - National trade association with business support. Membership number 13695.

Mid Wales Manufacturing Group - Business support group

Ethical Junction - A support tool for ethical enterprises

British Association for Print and Communication - Print specific business support and advice organisation.

## **21. Awards**

People in Print - Environmental Printer 2009

BPIF Excellence Awards Environmental Printer 2009

BPIF Excellence Awards for Corporate Social Responsibility 2009

PPA Magazine Production Awards 2008 - Environmental Performance or Initiative of the Year

QiPM 2008 - Environmental Print Supplier of the Year

Print Week Awards 2007 - Environmental Company of the Year

Print and Paper Monthly People in Print Awards 2007

Editors Environmental Award

Green Apple Environmental Awards 2006 & 2007

National Recycling Awards 2006/09

Arena Network Waste Minimisation Award 2005

22. Achievement of Objectives and Targets 2009	Actions and Status
<b>General</b>	<b>General</b>
Improved efficiencies in deliveries. Increased use of company vehicles.	Achieved.
eCommerce and Lean Manufacturing techniques to be used to make significant cost savings.	Partly achieved. £250k of cost savings made during 2009 but not all as a result of eCommerce.
<b>Environment</b>	<b>Environment</b>
Increase the amount FSC material usage.	Achieved. Increased from 57% to 75%
Install an ink pumping system to remove all plastic ink cartridges.	Achieved.
Further reduction in IPA usage by 50%	Achieved. Surpassed target IPA completely removed from press dampening systems. Now Alcohol free.
Improved recirculation of water in platemaking.	Achieved. Surpassed target. New technology enabled an overall 50% reduction in water use and a
<b>Energy</b>	<b>Energy</b>
Reduction in kWhs used to process a tonne of paper.	Partly achieved.
<b>Quality</b>	<b>Quality</b>
Total spoilage costs to be reduced.	Partially achieved. Reduction in spoilage costs, but 1% above target.
10% Reduction in Customer Complaints.	Achieved.
<b>Health &amp; Safety</b>	<b>Health &amp; Safety</b>
Improve consistency of Health & Safety staff inductions.	Achieved. Controlled document introduced.
Raise awareness of Health & Safety through better communications with managers and staff.	Achieved. A range of guidance issued to managers via company email system

### 23. Monitoring and Measurement

The company has established and maintains documented procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that can have a significant impact on the environment. This shall include the recording of information to track performance, relevant operational controls and conformance with the company's objectives and targets. Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to the organisation's procedures. The organisation shall establish and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations.

### 24. Non-conformance and Corrective and Preventive Action.

The company has established and maintains procedures for defining responsibility and authority for handling and investigating non-conformance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action. Any corrective or preventive action taken to eliminate the causes of actual and potential non-conformance shall be appropriate to the magnitude of problems and commensurate with the environmental impact encountered. The organisation shall implement and record any changes in the documented procedures resulting from corrective and preventive action.

<b>25. Objectives and Targets for 2010</b>	<b>Measure of Achievement</b>
<b>General</b>	
Review of efficiency of heating system.	Source independent report on heating systems/boilers. Aim to save 15% of CO2 and costs.
Install shrink wrapping equipment to reduce cardboard packaging.	25% reduction in cardboard packaging..
<b>Environmental</b>	
Maintain level of FSC/PEFC and/or recycled substrates at 2009 figures	75% of paper processed to be so certificated.
Working towards EMAS accreditation.	EMAS certification August 2010.
Duty of Care audit visits to two suppliers/waste transfer partners.	Two completed DoC visits
Reduction in paper lost during manufacture	1% saving in paper lost during manufacturing.
<b>Energy</b>	
Reduction in kWhs used to process a tonne of paper.	10% reduction in kWh ratio to tonne of paper.
<b>Quality</b>	
Total spoilage costs to be reduced.	Total spoilage costs to be at or below 1.75% of turnover. Monitored monthly.
Reduction in Customer Complaints.	10% reduction in Customer Complaints.
<b>Health &amp; Safety</b>	
Improve communication of Health & Safety issues.	Form Health & Safety Committee.
Continue to raise awareness of Health & Safety through better communications.	Increased use of internal email system and visual management aids.

Also see controlled document CP048Jan10 - Objectives and Targets 2010 for further details

## 26. Energy Policy

To implement the company's energy reduction objectives, a proactive approach is to be coordinated across all departments.

The workplace is a major consumer of energy and has a major role to play in energy efficiency. Cambrian Printers are committed to energy efficiency in line with monitoring and reducing its costs, along with minimising its effect on the environment.

A series of measures have been introduced to save energy and these include:

- The forming of the Energy Group
- The monitoring of all energy used, Electricity, Gas and Oil
- Increased management of energy usage
- Implementation of energy reduction initiatives
- Improved motor and vacuum pump efficiency
- Support for the use of renewable and sustainable energy - solutions where practicable.

### *Saving energy protects the environment*

There is a great deal of increasing evidence that climate change is the greatest environmental threat the world faces today. It is caused by emissions of greenhouse gases such as Carbon Dioxide. Carbon dioxide (CO2) is a by-product of our use of energy and by cutting energy consumption we automatically reduce total CO2 emissions. The UK is committed to reducing CO2 emissions through the Kyoto agreement. Business and the working environment accounts for a large proportion of the UK's energy consumption, and therefore its CO2 emissions. For the UK to meet its share of the global emissions targets, businesses and the public sector need to make energy efficiency a priority.

### *Saving energy saves money*

Saving energy makes an immediate difference to any organisation's bottom line. In the private sector this means reduced costs, so allowing the money saved to be available to be re-invested in the business such as in new equipment, staff training or improved facilities. Saving energy helps to safeguard the environment both today and in the future, for individuals and businesses alike.

## 27. EMAS

In working towards Eco-Management and Audit Scheme, commonly know as EMAS Cambrian Printers Ltd, Aberystwyth issue this environment Statement 2009. EMAS has been established to improve the quality of environmental management throughout European industry, to help companies to gain a competitive advantage from these improvements and to communicate their progress to the general public. This environmental statement has been compiled to comply with the requirements of EC Regulations No. 761/2001 of the European Parliament and the Council of 19 March 2001.

### **mission statement**

"The Environment and Quality, hand-in-hand, represents sustainability in production, procurement and policy"

## 28. Corporate Social Responsibility Policy

The company's strategy for advancing our vision of Corporate Social Responsibility is:

- The company strives to ensure that its business activities bring simultaneous economic, social and environmental benefits.
- We believe in working in partnership with the private sector, community bodies, unions, consumers and other stakeholders.
- We encourage innovative approaches and continuing development and application of best practice.
- We have set nationally recognised levels of performance in areas such as health & safety, the environment and equal opportunities.
- We encourage increased awareness, open constructive dialogue and trust between all stakeholders.
- The company has created a policy framework which encourages and enables responsible business behaviour.

This policy supports the Government's strategy for sustainable development, with its aims of integrating our objectives on social progress, effective protection of the environment, prudent use of natural resources and high and stable levels of economic growth and employment to ensure a better quality of life for everyone, now and for generations to come.

We want our business practices to ensure successful and profitable operations and also contribute fully to achieving our sustainable development goals.

## 29. Disability Policy

For the purposes of this policy, disability is understood in the broadest sense and, in addition to mobility and sensory impairments, includes mental health problems, specific learning difficulties and medical conditions which may have an impact on day-to-day activities.

In compliance with Disability Discrimination Act 1995: part 4, Cambrian Printers are committed to, making reasonable adjustments for members of staff or applicants and customers with disabilities so that they are given every opportunity to work with Cambrian Printers Limited.

The Managing Director will ensure that this policy is properly communicated to all management and employees, and will ensure it is applied in a way that shows respect for those concerned. All employees must recognise their personal responsibility for the practical application of this policy.

This policy also extends to members of the public visiting company premises.

## 30. Cycling Initiative

Cambrian Printers is committed to the promotion of cycling (along with other measures) to reduce the indirect impact of the daily commute to work and to encourage the greater use of cycling as a form of transportation both for pleasure and necessity. As part of its commitment Cambrian Printers offers the following;

- Regular updates regarding cycling and cycling related information, both local and national.
- Advice about cycling routes and paths.
- Shower facilities for cyclists.
- Secure cycle storage.
- Interest free loans to purchase bicycles for employees up to a maximum of £250.00.

## 31. Responsible Paper Purchasing Policy

Cambrian Printers has a commitment to responsible purchasing of paper products.

It is our aim to source all paper from legal, credibly certified sources, and to increase the percentage of recycled material in the paper products we sell.

To achieve these aims, we will:

- Communicate this policy to our paper suppliers.
- Expect and require our suppliers to abide by all local, regional, national and international laws.
- Scrutinise suppliers and request information on the source of the paper products they supply.
- Evaluate this information in the context of Cambrian Printers' policy, and seek to eliminate suppliers who refuse to support this purchasing policy.
- Encourage our suppliers to do the same with regard to their own suppliers.
- Where requested, provide information on the source of paper products to our customers.
- Aim to continuously increase the amount of paper which comes from credible certified forests, through FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) Chain of Custody accreditation.

We aim to work with key stakeholders to ensure that best practice is followed.

Cambrian Printers will not purchase paper or paper products which originate from:

- Forests or paper manufacturers which do not abide by all legislation relevant to their business.
- Protected areas, or forests which are recognised as having high conservation values.
- Forests which are being inappropriately converted to other land uses.

We recognise and acknowledge Timber Assurance Schemes as assessed and approved by Defra and the Central Point of Expertise.

### 32. Sustainable Raw Material

The Forest Stewardship Council (FSC) and the Programme for European Forest Certification (PEFC) are international networks to promote responsible management of the world's forests. Cambrian Printers are accredited for Chain of Custody as a supplier of printed product derived from a substrate that is sourced from wood that can be verified as coming from FSC and/or PEFC forests. The company is also committed to the promotion of recycled paper wherever practicable.

### 33. Welsh Language Policy

Cambrian Printers believe that in carrying out its business operations in Wales, the English and Welsh languages should be treated on the same basis of equality.

We pride ourselves on having taken the issue of language seriously over many years. By acknowledging our moral and legal duties to protect the cultural heritage of the area and to meet the expectations of the local community, we also acknowledge the positive service benefits of conducting our business in both languages.

- We welcome telephone enquiries in Welsh or English.
- We welcome correspondence received in Welsh or English, and will respond in the client's preferred language.
- We welcome requests to discuss matters with the Service in Welsh or English.

The company will attempt to use the language of choice of the individual whenever possible.

A Welsh language version of this policy is available on request.

### 34. Communication

With regard to its environmental and other aspects and environmental management system, the company has established and maintains procedures for;

- internal communication between the various levels and functions of the organisation;
- receiving, documenting and responding to relevant communication from external interested parties.

The company considers processes for external communication on its significant environmental aspects. The company has an open dialogue with the public and other interested parties including local communities and customers with regard to the environmental impact of their activities, products and services in order to identify the public's and other interested parties' concerns.

### 35. Management Review

A Senior Management Group Review is held annually in November to ensure its continuing suitability, adequacy and effectiveness of Integrated Management System and procedures. The management review process ensures that the necessary information is collected to allow management to carry out this evaluation. The review is documented.

The management review also addresses the possible need for changes to policy, objectives and other elements of the Integrated Management System in the light of audit results, changing circumstances and the commitment to continual improvement.

### 36. Environmentally Friendly Driving Advice

- If possible try to avoid using the vehicle for short journeys - use public transport, ride a bicycle or walk.
- Plan ahead - choose un-congested routes, combine trips, car share.
- Cold starts - drive off as soon as possible after starting.
- Drive smoothly and efficiently - harsh acceleration and heavy braking have a very significant effect on fuel consumption, driving more smoothly saves fuel.
- Slow down - driving at high speeds significantly increases fuel consumption.
- Use higher gears, as soon as traffic conditions allow.
- Switch off - sitting stationary is zero miles per gallon, switch off the engine whenever it is safe to do so.
- Lose weight - don't carry unnecessary weight.
- Remove roof racks etc when not in use. Regular servicing helps keep the engine at best efficiency.
- Keep the pressure up - make sure the tyres are inflated to the correct pressure for the vehicle.
- Check your fuel consumption - it will help you get the most from the vehicle, changes in overall fuel consumption may indicate a fault.
- Use air-conditioning sparingly - running air-conditioning continuously will increase fuel consumption significantly. Do not compromise safety but be aware that the use of onboard electrical devices increases fuel consumption (from DVLA website 2005).

### 37. Gardening Initiative

The Gardening Initiative has employed local gardening contractors who now have established mature flowerbeds and lawns around the company's perimeters. These will be maintained throughout 2010 to add colour to the neighbourhood and provide additional habitat for wildlife.

### 38. Accreditations (2009)

Accreditation	Issue date	Expiry date	Certificate No.
ISO9001-2000	20 Mar 2001	09 Nov 2009	10665
ISO14001-2004	24 Mar 2004	30 Nov 2010	E 564
FSC	31 May 2006	30 May2011	TT-COC-2200
PEFC	31 May 2006	30 May2011	BMT-PEFC-0265

### 39. Environmental Integrated Management System

The company has established and maintains programme(s) and procedures for periodic management system audits to be carried out, in order to determine whether or not the management system;

- conforms to planned arrangements for environmental management.
- has been properly implemented and maintained;
- has provided necessary and appropriate information on the results of audits to the management group.

The company's audit programme and schedule, is based on the importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedures covers the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.

#### 40. Environmental Training

A team of staff members have been trained in tackling minor spills. All new staff have attended a session of environmental awareness training. A continuously updated Induction Programme has been updated and developed to take account of ongoing priorities. FSC/PEFC inductions are held for key personnel and Nominated Person in Charge training.

Integrated Management System presentations (which includes Environmental, Quality and Health and Safety management) have been given to manager, customers, potential customers, suppliers, and NGOs such as the Royal Society for Chemistry and the Royal Horticultural Society.

#### 41. Continual Improvement

In accordance with our commitment to prevent pollution and reduce the impact of our activities on the environment, we have a programme of continual improvement.

Every year management sets objectives and targets for achievement. The broad basis of our objectives are:

- To increase waste separation and reduce landfill waste.
- To improve the efficiency of electrical energy.
- To reduce packaging.
- To increase/ maintain levels of FSC paper usage.
- To improve communication of environment issues to our staff and stakeholders.
- To reduce usage of solvents and chemicals.
- To be creative and innovative in our approach to environmental solutions.

#### 42. Raw Materials

Our main raw materials are paper, aluminium plates, solvents (which are recycled) and ink. Significant investments in technology has seen continued reduction in paper loss and solvents. Since 2006 paper waste has been reduced by 5%.

#### 43. Landfill Waste

Landfill waste has increased due to greater production levels and Lean Manufacturing initiatives designed to improve housekeeping. It is a company commitment to keep landfill waste to a minimum.

Year	Landfill
2006	169400 litres
2007	160600 litres
2008	180400 litres
2009	195800 litres

#### 44. Cambrian Printers Recycling Policy

Cambrian Printers are committed to protecting and improving the environment by recycling commonly used materials such as plastic, aluminium printing plates and cans, mixed paper and cardboard, as well as materials classed as hazardous under the Hazardous Waster Regulations 2005.

It is the policy of the company to adopt such practices of reduction, reuse, recycling and recovery wherever financially and logistically feasible and to endeavour, progressively, to improve the company's capabilities in this respect. A comprehensive segregation and recycling system is in place throughout the site.

The company is committed to only contracting with appropriately registered and/or licensed waste transfer partners and accepts and acknowledges its responsibilities as an Environmental Agency registered waste producer. This policy is intended to aid compliance with the Pre-treatment Regulations 2007. Also see Waste Streams document.

The goals of this action policy shall be to:

- Preserve resources, minimise waste and reduce the impact on the environment.
- Investigate ways of re-using waste in one form or another.
- Reduce the percentage of company waste consigned to landfill.
- Stimulate the interest of all employees in the importance of sound environmental and recycling practices and to encourage their full participation.
- Reduce the amount of non-recyclable/reusable waste produced by the Company, thereby reducing the negative environmental impact of our Company while reducing costs.
- Separate waste out into its constituent parts for recycling.

These goals can be achieved with the co-operation of all the Company's employees and stakeholders.

#### 45. Unusual and Emergency Situations

Unusual and emergency situations are assessed under the review of the company's Register of Aspects. Please see Register of Aspects.

#### 46. Ancillary Activities

All the company's activities on site relate directly or indirectly to the print production and administration functions of the business.

#### 47. Environmental Performance and Practices of Contractors, Sub-contractors and Suppliers

Meetings between our suppliers always require environmental, health & safety and quality input. All contractors, sub-contractors and suppliers on-site must abide by the company's Visitor and Contractor Advice. A survey of suppliers credentials is continuously on-going.

#### **48. On Press Colour Management**

With on press computer controlled colour management, the required quality can be achieved more speedily with less make-ready sheets. Colour standard is maintained during operation resulting in a significant reduction in make-ready times and waste paper.

#### **49. Notch Binding**

Cambrian Printers use what is referred to as Notch Binding on our Perfect Binder, so we slot-perf the spine on all signatures destined for this type of binding. By perfering the spine we notch out a slot of paper along the spine that allows the glue to penetrate up into the middle pages of the section. Less spine margin possible for binding has lead to a saving on paper tonnage purchased producing a saving of 4%.

#### **50. Reduce**

Cut out device fitted on binding line to isolate 3 knife trimmer head when books are not present, saving electricity and reducing noise. Waste is monitored throughout the manufacturing process by way of job documentation records. Energy, water and waste are monitored weekly.

#### **51. Repair and Re-use**

Cambrian Printer's IT department repair and re-use computer components. Used printer cartridges are returned for renovation and re-use. On-site maintenance capacity exist for IT and mechanical facilities.

#### **52. Recycle**

Cambrian Printers recycle 90% of waste material. Printing plates can be re-melted - using only around 5% of the energy used in primary production - and can be recycled time and again without loss of quality. Redundant mobile phones are donated to charity for recycling. Scrap printer cartridges from office printers and old mobile phones are donated to charity for renovation or recycling.

#### **53. Digital Printing**

Digital printing is essential to Cambrian's commitment to reducing environmental impact. Largely chemical free and does not require printing plates. The principles of print-on-demand mean less wasted paper.

#### **54. Noise**

The company commissioned a full noise survey by the Swansea University in March 2006 and a follow up survey to take account of new equipment, the findings have been actioned.

#### **55. The Wormery**

A tidy, no-smell way to dispose of organic waste; You put in teabags, odds and ends of apple cores, banana skins, and leftover sandwiches and within weeks you get liquid plant food and in months you get fantastic compost.

#### **56. Legal Compliance**

The legislation list is kept up-to-date based on information supplied by Arena Network, Envirowise, BPIF and HSE. The company is in compliance with all current legislation.

#### **57. Purchasing Policy**

All purchasing activity will comply with EU rules and domestic policy governing procurement, and will be based on the achievement of value for money to ensure that waste in the company supply chain is minimised

All invitations to tender will include appropriate environmental requirements, as outlined in the company's Environmental Statement.

Tender evaluations will use recycled and sustainability sourced materials and services where appropriate, to assess the environmental costs over the life of the materials/services offered. Suppliers to Cambrian Printers shall be made aware of the Company's environmental policy and relevant objectives and targets.

Company employees shall not use their authority or office for personal gain and shall at all times seek to uphold and enhance the standards of the Company. Any personal interest which may impinge or might reasonably be deemed by others to impinge on an employee's impartiality in a matter relevant to his or her duties should be declared to the Commercial Manager who shall keep a register of declared interests, including those of himself/herself for whom a nil return is required.

The confidentiality of information received in the course of these duties should be respected and should never be used for personal gain.

While bearing in mind the advantages to the Company of maintaining a continuing relationship with a Supplier, any arrangement which in the long term prevents the effective operation of fair competition should be avoided. Business gifts other than items of very small intrinsic value such as business diaries, mugs or calendars etc. should not be accepted.

Modest hospitality is an accepted courtesy of a business relationship. However, the recipient should not allow him/herself to reach a position whereby he or she might be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality.

Personal purchases through the Company's purchasing system, even with reimbursement to the Company by the individual, are not permitted.

#### **58. Collection of Integrated Data**

- Weekly utility readings are taken by the Health & Safety Officer or nominated deputy
- The Performance Director collates the information and analyses the trends and key performance indicators (as outlined in CP055)
- The review and quantifying of the results will be fed back to senior management.
- Paper issued weight is supplied by the Commercial Manager or nominated deputy to the Performance Director or nominated person.
- Hazardous waste and other waste streams are monitored via the various transfer partners' notes (CP014) and retained for inspection in Systems & Technical Manager's office.
- Plastic and Cardboard waste is monitor by way of company transfer note (CP057) and retained as above.

## 59. Air Emissions

Solvents and chemicals are used in the manufacturing process. Other VOCs are used in cleaning and maintaining production machinery. Cambrian Printers does not exceed the 25 tonnes per annum threshold for solvent emissions and thus does not need registration under IPPC legislation. Since June 2009 all the company's press have operated alcohol (IPA) free. Solvents used in press cleaning are controlled by automatic processes and reduced wherever possible.

Year	Inks	TOTAL SOLVENTS
2007	12.95 tonnes	20 tonnes
2008	19.33 tonnes	14.25 tonnes
2009	21.99 tonnes	7.30 tonnes

For ease of calculation a litre has been taken as a kilo. It is likely that the actually specific gravity for each of the solvents would be less than 1 and therefore a litre would be less than a kilo.

Materials not present on site: Arsenic, Cadmium, Chromium (VI), Mercury, Lead, Antimony, Tributyltin, CFCs, Chlorinated paraffins, PCBs, Carbon tetrachloride, Methylene chloride, 1-Trichloroethane, Tetrachloroethylen and Nitrous Oxide N2O

## 60. Ink

All our lithographic inks and coatings are classified as non-hazardous. They contain high levels of non-volatile vegetable oil based type materials, generally a mixture of boiled linseed and soya oils. Some solvents, in small amounts are required to help with certain performance characteristics. The solvents used have a very low environmental impact and are carefully monitored. Other constituent parts are made up of renewable natural resins and organic and non-organic pigments.

## 61. Energy

Electricity usage is a significant environmental impact at Cambrian Printers. We are continually investing in modern energy saving equipment to develop further efficiency measures to drive down emissions of energy generation and costs.

Year	Electricity	Gas
2006	1290255kWh	303312kWh
2007	1522130kWh	388344kWh
2008	1698458kWh	304412kWh
2009	1678772kWh	303533kWh

Electricity and Gas consumption has been reduced mainly due to consolidation of plant and improved efficiencies in production.

*\*For gas usage the meter readings must be converted from therms to kilowatts using a conversion factor.*

## 62. CO2 Emissions

2009 saw a fall in total direct emissions of approx. 57 tonnes of CO2, thus a lesser amount. The paper tonnage continues to increase. The company has managed, through monitoring and energy saving initiatives to reduce the CO2 per tonne of paper processed at 0.27.

Year	Gas	Electricity	Business Miles	Gas Oil	Train/ plane Journeys
2007	71.10 tonnes	654.5 tonnes	27.73 tonnes	25.2 tonnes	2.4 tonnes
2008	56.3 tonnes	730.3 tonnes	35.2 tonnes	32.1 tonnes	1.8 tonnes
2009	55.7 tonnes	721.87 tonnes	13.47 tonnes	0 tonnes	4.4 tonnes

Year	Total CO2 emissions	Paper Issued	CO2 per tonne of paper
2007	780.93 tonnes	2450 tonnes	0.31 tonnes
2008	854.6 tonnes	2787 tonnes	0.30 tonnes
2009	797.52 tonnes	2986 tonnes	0.27 tonnes

Total direct emissions are all emission from company vehicles, energy purchased for heating, production and administration purposes and business travel. Emissions from paper manufacture and transportation of supplies are not included.

## 63. Transport

CO2 emissions have been calculated for transport in company vehicles, e.g. deliveries, sales and customer visits from approximate fuel efficiency values for each vehicle. Deliveries of raw materials and collection of waste is all by road and has not yet been measured. Delivery of goods to outworkers and of finished goods is by Royal Mail and several couriers by road, train and air, and has not yet been measured. A Cycling Initiative has been introduced. Bringing laminating in-house with the purchase of the Autobond laminating machine has saved approximately 12,000 miles in ferrying products to and from a trade laminating company in Gloucester. Combining of incoming deliveries is being organised with suppliers at every opportunity.

## 64 Pollution Prevention

Most chemicals are now stored in IBCs, reducing the risk of pollution associated with moving fresh and waste drums with a forklift and cutting down on manual handling. All IBCs and chemical drums are stored on poly spill pallets. Cloths are available for dealing with minor drips and leaks. Spill kits are provided to soak up larger spills and staff have undergone training in tackling spills. Drains are not coded as they converge at a combined drain. See Pollution Prevention Plan CP016 and Pollution Incident Pack.

No pollution incidents have occurred.

## 65. Water Usage

Water is a very valuable resource that can be taken for granted. But, water is not as abundant in England and Wales as you would think. Water shortages don't just affect people: they can also seriously harm our environment. We realise that our water comes from natural environment so every drop we use has a direct effect on the environment. Fish, wetland birds and other wildlife that rely on ponds, rivers and streams struggle to survive when these dry up or run low. Sources of food and breeding sites for wildlife can be lost and fish can die through lack of oxygen. It's vital that we use water wisely. Cambrian Printers are committed to use water efficiently, to make sure that we have enough water and at the same time protect our important rivers and groundwater, now and for future generations

Cambrian Printers uses approximately 15m<sup>3</sup> of water a week. The water usage overall has decreased by approximately 530m<sup>3</sup> due to increased water efficiency in platemaking and other initiatives.

Year	Lotum/Avalon	Suprasetter	Overall Water use	Water use per tonne of raw material
2007	484m <sup>3</sup>	70m <sup>3</sup>	1080m <sup>3</sup>	0.44m <sup>3</sup>
2008	626m <sup>3</sup>	37.6m <sup>3</sup>	1300m <sup>3</sup>	0.46m <sup>3</sup>
2009	49m <sup>3</sup>	15m <sup>3</sup>	771m <sup>3</sup>	0.25m <sup>3</sup>

Year	Platemaking Water	Plate Usage	Water per kg of plates
2007	553.5m <sup>3</sup>	44549 kgs	0.012m <sup>3</sup>
2008	663.6m <sup>3</sup>	45834kgs	0.014m <sup>3</sup>
2009	64.6m <sup>3</sup>	49834kgs	0.001m <sup>3</sup>

## 66. Pandemic Policy

Swine Flu and other influenza type infections as defined by government agencies

Employers and employees should always practice good personal hygiene measures In addition at the current time you should:

- stay at home if they are sick with flu-like symptoms and have good reason to believe, based on Health Protection Agency guidance, that you may have been exposed to the swine flu virus

- The company will send home any employees who are displaying flu-like signs/symptoms in the situation described above

Such advice may change as our understanding of the virus improves.

- The only people who need to refrain from their normal activities (such as going to work) are:

- those who have been confirmed as having swine flu;
- those who are being investigated as a possible or probable case of swine flu;

- those who have been where a case is found to have been present and have symptoms of the illness (a possible case).

- Anyone who is being investigated as a possible case of swine flu (which means they meet the epidemiological criteria and have symptoms) will be given antiviral medicine and will be asked to stay at home and limit their contact with other people until the test results are available.

- Staff who have no symptoms but have had contact with probable or confirmed cases in social community settings do not need to be excluded from workplace. They should continue their normal daily routines.

It is important to remember that flu is usually spread from one person to another when an infected person has symptoms (i.e. coughing and sneezing).

General infection control practices and good respiratory hand hygiene can help to reduce transmission of all viruses, including swine flu. This includes:

- Covering your nose and mouth when coughing or sneezing, using a tissue when possible.

- Disposing of dirty tissues promptly and carefully.

- Maintaining good basic hygiene, for example washing hands frequently with soap and water to reduce the spread of the virus from your hands to face or to other people.

- Cleaning hard surfaces (e.g. door handles) frequently using a normal cleaning product.

- Making sure your family follow the same advice.

Use of face masks - The number of people in public places who are displaying symptoms is likely to be limited. Therefore it should not be necessary for workers to wear facemasks routinely when in contact with the general public. The HSE's guidance is that fluid-repellent surgical face masks offer a barrier to minimise contact with the mouth and nose but do not offer protection against aerosols. For further information about swine flu please visit the Health Protection Agency (HPA) website.

Strategic Planning for a pandemic;

1. The company will enforce the above advised actions and others as announced by government agencies.

2. The company will assess all staff for fitness to working (during an official pandemic outbreak) and will continue with enhanced return to work assessments.

3. Home working will be recommended for administration and other appropriate staff wherever possible to reduce the risk of infection.

4. Any reasonable materials recommended by government agencies will be supplied to staff as necessary.

5. Face to face meetings will be kept to a minimum and visit to the company will be suspended.

6. Visits by company staff to other sites, such as customers' offices will be suspended.

7. Various elements of the company's Continuity Plan may be implemented as relevant.

**67. Environmentally Accredited Paper Usage**

The company has targeted an increase in the use of raw materials with enhanced environmental credentials. In line with our stated objectives 68% of paper issued is either FSC certificated or has recycled content.

YEAR	FSC Paper	Recycled Paper
2006	4.4%	5.5%
2007	13.2%	13.6%
2008	57%	11.6%
2009	74.8%	6.49%

**68. Sustainability Policy**

The Company believes in development that meets the needs of the present without comprising the ability of future generations to meet their own needs.

The Company will:

- Adopt best practice standards
- Set annual Objectives & Targets to achieve sustainability
- Meet requirements of environmental legislation targets, at a global, national, regional and local level
- Build partnerships and projects that create learning networks

Cambrian Printers accepts the definition of sustainable development as "achieving economic growth, environmental protection and social progress at the same time".

**69. External Audits**

The company has been the subject of six audits in 2008, which have all been passed. Cambrian Printers value the audits and the auditor's comments and see the process as an opportunity to test the company's procedures and processes against national and international standards.

Accreditation/Topic	Auditor
ISO 9001	NQA
ISO 14001	NQA
FSC	BM Trada
PEFC	BM Trada
General Insurance Audit	Allianz

**70. Biodiversity Policy**

All aspects of the Company's operations, from the way in which we manage our organisation such as purchasing, facilities management, travel plans, maintenance; to our printing processes including plans and policies, will all have an impact on biodiversity. Cambrian Printers Biodiversity Policy reflects our recognition of this concept by:

- Assessing the impacts that our operations and activities (direct and indirect) have on biodiversity
- Seek to conserve and where possible enhance local biodiversity through the implementation of our statutory functions
- Meet and where possible exceed the requirements set out in the applicable biodiversity legislation and regulations
- Aim to implement a purchasing policy that favours those products and services that have the least impact on biodiversity
- Aim to implement a purchasing policy that favours those suppliers that take biodiversity into consideration in the way they conduct their services
- Seek similar standards and principles towards biodiversity conservation from all third parties involved with our business - suppliers, providers and contractors
- Endeavour to support projects and programmes that contribute to the conservation of biodiversity
- Include a consideration of the impacts on biodiversity in investment decisions that we make
- Engage with the local community and other stakeholders as far as is possible in connection with biodiversity conservation

In practical terms the following projects have been highlighted;

- Gardening Initiative - to encourage local wildlife
- Wormery - for compostable canteen waste and reduction in waste to landfill
- Cycling Initiative- to promote and support cycling as an eco-friendly form of transport
- Energy Efficiencies - Savings in CO2 emissions
- Recycling and Waste Management - Savings in landfill waste and pollution
- Environmentally Friendly Driving Advice - issued to all staff to help reduce vehicle emission
- IPA free printing - to promote a healthy working environment and reducing VOC emissions.

Locally and globally there are many different habitats and eco-systems supporting a diversity of species. Many are recognised as endangered, with some affording statutory protection, but all making their own contribution to the total biodiversity of the natural world. Cambrian Printers are committed to supporting a biodiverse environment.

## 71. Health & Safety Policy

This is the statement of general policy and arrangements for:

Cambrian Printers Ltd
Robert Read - Chairman/Managing Director
Norman Faulkner - Performance Director and Martin Lucas - Health & Safety Officer

Overall and final responsibility for health and safety is that of:

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

STATEMENT OF GENERAL POLICY	RESPONSIBILITY OF: Name/Title	ACTIONS and ARRANGEMENTS
To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.	Robert Read - Chairman/ MD Norman Faulkner - Director	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed every year, or earlier if working habits or conditions change.)
To provide adequate training to ensure employees are competent to do their work.	Norman Faulkner - Director Doug Gray - Director Departmental Managers	Staff and subcontractors given necessary health and safety induction and provided with appropriate training and personal protective equipment. We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main company site.
To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.	Robert Read - Chairman/ MD Members of the H&S group All staff	Staff routinely consulted on health and safety matters as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.
To implement emergency procedures - evacuation in case of fire or other significant incident.	Robert Read - Chairman/ MD Martin Lucas - H&S Officer	Escape routes well signed and kept clear at all times. Evacuation plans are tested from time to time and updated as necessary.
To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances.	Norman Faulkner - Director Doug Gray - Director Martin Lucas - H&S Officer	Toilets, washing facilities and drinking water provided. System in place for routine inspections and testing of equipment and machinery and for ensuring that action is promptly taken to address any defects. Staff trained in safe handling/use of substances.

Health and safety poster is displayed:	At main works entrance		
First-aid box and accident book are located: Accidents and ill health at work reported under RIDDOR: (Reporting of Injuries, Diseases and Dangerous Occurrences Regs)	First aid boxes at various locations throughout the factory and offices. Accident book located in Norman Faulkner's office with copies in canteen on the notice board.		
Signed: (Employer)	<i>R. H. Read</i>	Date:	01/01/10
Subject to review, monitoring and revision by:	Robert Read	Every:	12 months or sooner if work activity changes

## **72. Training Policy**

### **Statement of Commitment**

Cambrian Printers is committed to the continuous training and development of its employees both in the area of job related skills training and lifelong learning for personal development. Cambrian Printers' employees are one of its greatest assets and helping them develop is crucial to the achievement of the Company's goals.

All new employees will be given appropriate safety induction training and the company safety rules will be explained. In addition, they will be properly trained to carry out the specific responsibilities of their own individual job. The programme of training for each new employee will be set down by that employee's manager and be delivered by a manager or supervisor.

Induction training - will be carried out prior to a new employee commencing any work for the company, and whenever possible on the first day of employment.

The level of training and subjects covered will be determined by the nature of the appointment but will include as a minimum:

Company health and safety policy - aims, objectives and responsibilities, Fire drills and procedures, Specific job related training (including CoSHH, use of PPE, manual handling, safe systems of work, etc.)

Job specific training - will be carried out prior to an employee moving to a new area of work or being provided with new equipment. Departmental Managers will monitor performance and ensure that the previous training has been effective and put into practice so that any shortfalls can be identified and re-training take place.

Records will be kept of any information and training given and signed by the employee.

All training practices and procedures will endeavour to support individuals to strive to achieve these goals. To ensure that training activities support both the individual and company's objectives and are cost-effective all training activity will be planned and monitored in conjunction with the Personnel Department who will hold the training and development budget. Training needs will be analysed in a number of ways as set out below. Evaluation of all training will be carried out and a record of training will be held for each individual employee. The Training Policy will focused on creating a motivated workforce which is capable of meeting new challenges, is skilled and competent in all aspects and will tie in with the Company's objectives both short and long-term.

On-going job related training and/or professional development - i.e training needs which are identified as a means of an employee being enabled to improve their performance, their development within the company or as a means of their retaining and developing key skills and competencies. From time to time training needs may be identified as a result of a business change which will affect everyone within the company and this will come under the same category.

Personal development - a course of study which an individual undertakes, normally in their own time, which may improve their academic qualifications or give them an additional skill and/or improve their future employment prospects. This should relate to the type of work they do within the organisation. The Company will consider each case on its merits and benefit to the business when deciding what level of support to offer.

### **Evaluation**

All training will be evaluated by the Performance Director by means of feedback from the trainee and their manager. Managers will be asked for feedback in terms of improvement or changes in the trainee's performance particularly in the areas in which they have received the training. Training and development undertaken will be regularly reviewed. This will enable the company to ensure that the training organisations and methods being used are meeting both the Company's and the trainees' objectives and that value for money is achieved.

### **Recording**

Training records will be kept in employees personnel files for all training, whether in-house or external. The information will include details on the course content and costs.

## **73. Energy Consumption and Efficiency**

The workplace is a major consumer of energy and has a major role to play in energy efficiency. Cambrian Printers is committed to energy efficiency in line with monitoring and reducing its costs, along with minimising its effect on the environment. A series of measures have been introduced thereby Reducing Greenhouse Gas Emissions:

- Replacement of 400 conventional lighting ballasts with high frequency/high efficiency ballasts. Saving up to 80% of our lighting energy costs, enough to run a printing press. Saving 1.5 tonnes of CO<sub>2</sub> emissions per annum
- Compressors placed on timer switches, which are weekly programmable enabling a considerable quantity of power to be saved each week.
- A cut off switch has been fitted to bindery equipment to prevent continuous operation when books are not being produced in the make-ready phase of the process. Thereby, savings are made by reducing un-necessary idling of machinery. Saving approximately 1.2 tonnes of CO<sub>2</sub> emissions per annum
- A Central Vacuum System replacing 14 compressors, saving 123,000 kWh and 53 tonnes of CO<sub>2</sub> per annum
- Disc-less workstations running from server as remote desktop, savings of 2000kWh per 10 disc drives per annum. A total CO<sub>2</sub> saving of 1.5 tonnes.
- Home working for part of the working week is made possible for several employees using remote desktop technology. this initiative saves approximately 15,000 commuting miles per year and 5 tonnes of CO<sub>2</sub>.

## **74. Review Group**

The Review Group represent the company at different levels and grades. The Integrated Management System is configured to reflect the requirements of national and international standards by detailing the company's procedures, process, practices and performance.

## 75. Emergency plan for evacuation

Cambrian Printers' have an emergency plan for evacuation of the factory. All members of staff have been made aware of this and the information can be found displayed on the Health & Safety notice board.

A full fire risk assessment has been carried out to comply with the regulatory reform (Fire Safety) order 2005, this superseded the fire precautions (workplace) regulations 1997.

### GENERAL STATEMENT

Cambrian Printers' are a responsible employer and take our fire safety duties seriously. For this reason we have formulated this policy to help us comply with our legal obligations to staff and visitors under the Fire Precautions (Workplace) Regulations 1997 (as amended). These include the provision of a safe place of work where fire safety risks are minimised. Due to its importance, this fire safety policy also forms part of our overall health and safety policy.

Employees' duties - All employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk of harm. They are also expected to co-operate fully in complying with any procedures that may be introduced as a measure to protect the safety and well-being of staff and visitors.

Communication - Staff will be informed of any changes that are made to the fire safety procedures and fire risk assessment. We will also ensure that all visitors to our premises are briefed in the evacuation procedures and not left unaccompanied unless they are aware of, and familiar with, all available escape routes.

Procedures - The following procedures have been introduced in order to maintain high standards of fire safety:

A fire risk assessment has been undertaken which will be reviewed on an on-going basis. More frequent reviews will occur if there are changes that will impact on its effectiveness. These may include alterations to the premises or new work processes. The fire evacuation procedures will be practiced at least once annually.

Training will be provided as necessary to any staff given extra fire safety responsibilities, such as first aid and spill kit personnel.

a) It is our policy that all staff will be aware of the correct use of fire extinguishers.

b) All new members of staff and temporary employees will be provided with induction training on how to raise the alarm, correct use of fire extinguishers and the available escape routes and procedures to evacuate.

c) All escape routes will be clearly signed and kept free from obstructions at all times.

d) All fire related equipment will be regularly serviced and maintained. If any employee notices defective or missing equipment they must report it to a manager.

e) Alarm systems will be tested regularly. Staff and visitors on site will be told when a test is scheduled.

f) Any other safety systems will be checked regularly to ensure correct operation, where necessary, e.g. emergency lighting.

g) This policy forms part of employees' conditions of employment. Failure to comply may be treated as a disciplinary matter.

## 76. Register and Evaluation of Environmental Impacts

The company has established and will maintain procedure(s) to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment. Cambrian Printers shall ensure that the aspects related to these significant impacts are considered when setting its environmental objectives. The company shall keep this information up-to-date.

Management will review these evaluations when major changes are made to processes or equipment, or at least annually. In assessing aspects, consideration has been given to normal and abnormal operations and potential emergency conditions. A scoring system has been developed to prioritise impacts.

## 77. Assessment of Significant Environmental Aspects

The company has incorporated procedures based on recommendations by Envirowise when assessing significance of its aspects.

We have carried out the following steps in our environmental assessment:

1. We have reviewed the processes which are either directly or indirectly affected by the company's activities.

2. We have consulted with selected organisations and groups and propose to hold further consultations in future.

3. We have reviewed the possible environmental effects resulting from each of the activities carried out during normal and other conditions during operation, maintenance and de-commissioning.

4. We have made an assessment of the likely consequences and environmental effects of the company's activities.

Management will review this procedure when major changes are made to processes or equipment, or at least annually.

In assessing aspects, consideration has been given to normal and abnormal operations and potential emergency conditions.

Legal implications - scored from 1 to 3, with 1 being least and 3 being most serious

Environmental Damage - scored from 1 to 3, with 1 being least and 3 being most serious

Interested Parties - scored from 1 to 3, with 1 being least and 3 being most serious

Quantity and or Severity - scored from 1 to 3, with 1 being least and 3 being most serious

Priority - scored in terms of overall effect on the environment.

## 78. Register and Evaluation of Environmental Aspects

Aspect	Activity	Environmental Impact	Relevant Legislation	Actions taken to lessen Impact
Paper/raw material usage <b>Direct and indirect</b>	Print/proofing Storage	De-forestation. Pollution caused during manufacture through fossil fuel use. Pollution caused by delivery	Environmental Act 1995 Climate Change Levy	FSC & PEFC Chain of Custody Certification. Notch binding savings and image control. Controlled production process. Investment in equipment.
Landfill rubbish	Generated in production. and offices.	Ground pollution. Water pollution. Global warming (from collection vehicles, decomposition, unnecessary production).	Landfill Tax Regs 1996 PPC Regs Groundwater Regs 1996 EPA 1990 pt 1&2	Waste segregation procedures. Wooden pallets recycled either as refurbished pallets, fuel or building material. Cardboard and plastic collected for recycling by local company. Wormery for canteen waste.
Power consumption - electricity	All areas	Global warming. Air pollution (from electricity generation).	Climate Change Levy	Improved power factor figure. Energy Group monitors and review initiatives and potential savings. Carbon Trust survey and report 2006. + CCL discount due to energy saving initiatives.
Compacting on-site	Paper compacter	Dust, noise and transportation of waste paper. Potential nuisance to community and neighbours	Environmental Protection Act 1990 Waste Management Regs. 1994 (exemption) Noise Regs.2005	Silencer fitted to compacter. Regular maintenance and servicing of all equipment. Noise survey carried out 2006 Exemption held. System lagged to reduce noise
Chemicals & Solvents	Printing Storage	Ozone layer depletion (from volatile organic compound missions). Fire risk	CoSHH EPA 1990 pt 1&2 Hazardous Waste Regs. 2005 Fire Regs.	IPA reduction. CoSHH assessments carried out. Automatic washers fitted to printing presses. Vegetable oil based lithographic inks.
Recycling of waste	Generated in production and offices.	Global warming (from collection vehicles, energy for reworking, energy for unnecessary production)	Climate Change Levy Environmental Act 1995	Waste monitored and process reviewed by senior management. Duty of Care visits to waste transfer partners. IT waste transferred for re-use. Printing plates and aluminium cans recycled. Paper recycled for re-pulping by local company. Printing blankets recycled as protection for horses in show jumping arena. Ink tins returned for recycling and re-use + Ink cartridges redundant.
Spillage, leak and flood	Spillage of ink and chemicals (new and used). Maintenance. Storage.	Water pollution. Land pollution. Air pollution.	Groundwater Regs 1996 PPC Regs. EPA 1990 pt 1&2	Spill kits provided and spill kit training given to staff. Pollution Prevention Plan. Low emission solvents/chemicals. Good house-keeping practices. Air quality surveys.
Deliveries. Collections. Sales and technical visits.	Use of diesel and petrol. Maintenance of vehicles and rubber tyres wear.	Global warming. Air pollution (leading to acid rain). Water pollution (from oil spillage and rubber wearing on roads).	Climate Change Levy EPA 1990 pt 1&2 PPC Regs	Cycling Initiative and Environmental Driving Advice. Batched deliveries. Local contractors and suppliers used wherever possible. Lamination brought in-house. Train journeys considered as first option for sales visits. Bottle fed water dispensers replaced with mains fed.
Water usage	Plate making. Presses. Hygiene/domestic	Waste water treatment. Energy for heating. Possible pollution pathway	Water Industry Act 1991 EPA 1990 pt 1&2 Water Resources Act 1991	Purchase of CtP unit with water recycling function. Weekly monitoring of usage.
Consumption of gas (oil use discontinued)	Heating	Global warming. Habitat damage (from drilling activities)	Climate Change Levy	Electrically operated doors for ease of closing to keep heat in. Thermostatic controls. Weekly monitoring of usage.

## 78. Register and Evaluation of Environmental Aspects (cont.)

Aspect	Activity	Environmental Impact	Relevant Legislation	Actions taken to lessen Impact
Contractors and agents <b>Indirect</b>	Use of diesel and petrol. Maintenance of vehicles and rubber tyres wear.	Global warming. Air pollution (leading to acid rain). Water pollution (from oil spillage and rubber wearing on roads).	Climate Change Levy EPA 1990 pt 1&2 PPC Regs	Local contractors and suppliers used wherever possible.
Production equipment	Noise	Individual impact Potential nuisance to community and neighbours.	Noise Regs.2005 EPA 1990 pt 1&2	Regular maintenance and servicing of all equipment. Noise survey carried out 2006.
Abnormal conditions	Adverse weather. Waste mis-identified. Incorrect response to incident.	Potential pollution threat from storm damage and waste wrongly treated on response materials or actions.	Water Industry Act 1991 EPA 1990 pt 1&2 Water Resources Act 1991	Training and good house keeping practices.
Emergency conditions	Fire, flood, gas leak and asbestos failure	Accidents, incidents, debris and smoke, dust particles released into environment (direct). Run off of fire fighting and other materials (indirect).	Water Industry Act 1991 EPA 1990 pt 1&2 Water Resources Act 1991	Emergency procedures. Training and good house keeping practices.
Environmental Support <b>Positive</b>	External professional advice, guidance and reference material. Information regarding current legislation and best practice. External audits and assessments.	Information and compliance with standards.  Access to grants and various business support mechanisms.	ISO 14001:2004, FSC & PEFC standards. Environment Agency & HSE material, BPIF trade association input, MWMG and Ethical Junction. Regular close contact with the Carbon Trust, Envirowise and other leading business support agencies.	Help with environmental and sustainability measures with support to aid compliance with legal requirements, best practices and national and international standards.  Cascade of knowledge throughout the company supply chain and awareness of a range of environmental issues to our employees and partners.

Activity	Normal Conditions	Other Conditions	Priority
Paper/raw material usage Direct and indirect	14	9	1
Compacting on-site	12	11	2
Consumption of gas and oil	14	9	3
Water usage	10	12	4
Landfill rubbish	10	12	5
Power consumption - electricity	11	9	6

## 79. Duty of Care Visits

2009 saw the continuation of Duty of Care visits. The purpose was to audit our supplies and to evaluate their systems and practices. 2010 will see further visits to suppliers and waste transfer partners.

2006	2007
Parry & Evans waste paper transfer partner.	Safety Kleen Solvent recycling Cardiff.
Burgo Paper & Pulp Mill, Belgium Supplier of raw material (paper)	Aberystwyth Recycling Plastic, cardboard and Aluminium cans. Llanbadarn, Aberystwyth
J&G Environmental hazardous waste transfer partner, Hampshire	
Cranfield Inks, Cwmbran Supplier of printing inks	

2008	2009
J&G Environmental hazardous waste transfer partner, Hampshire	J&G Environmental (Lanstar) hazardous waste transfer partner, Manchester
KBA Dresden, Germany, Press manufacturer.	Grada Paper Mill Northern Italy, main paper manufacturer.

## 80. Business Benefits

Cambrian Printers have realised for many years that it makes good sense to balance the needs of business with those of the environment and the community as a whole. We first started working on ISO14001 and Green Dragon six years ago and we've gone from strength to strength. In discussions with our stakeholders and the desire to improve business performance, environmental issues were identified as an area which could reduce waste and spoilage and thereby improving productivity, contribute to raising the company profile through achievement of standards and classification and lead to continuous improvements in managing the production process.

It's part of thinking where our business is going in the future. Consumers increasingly demand goods and services that are produced by environmentally and socially responsible companies.

There are a number of benefits of adopting this approach, known as "sustainable development".

It encourages greater business efficiency and cost savings.

It gives a "competitive advantage" over other firms.

It encourages us to innovate and develop new ways of operating.

Introducing new management procedures more often than not leads to better business practices. Implementing environmental practices and procedures shows that Cambrian Printers is a mature company which cares about its impact on the environment both locally and globally. And it helps get new opportunities in new markets.

Being based in a rural area and being part of our local community further highlights the need for environmental sensitivity. Increasingly, particularly with public sector tenders and contracts, we're asked how we contribute towards environmental stewardship so it's definitely something that's of increasing importance to winning new clients.

It's also a great selling point for new clients, knowing that we take this much care over our environmental practices is an indication of our attention to detail and our customer care levels.

## 81. Accident Analysis

There has been a decrease in accidents year-on year since 2005. 2007 saw the first stage of manual handling training implemented and provision for individually fitted ear defenders. These improvements complement existing measures such as pile turner, modern guillotine paper processing equipment, laminator roll hoist, PPE and spill kits. During 2007 Swansea University, School of Engineering carried out surveys and reported on; Noise and Air Quality.

The company has previously gained recognition for its efforts to reduce manual handling risks from the HSE's "Better Backs" initiative.

Type of Injury	2005	2006	2007	2008	2009
Minor Injury	14	10	10	3	8
RIDDOR incident	0	2	0	1	0
Major Injury	0	0	0	0	0
TOTAL	14	12	10	4	8

## 82. Risk Assessment

Risk assessments have been carried out for all on-site activities (including contractors). Standard Working Procedures cover all operations, equipment and processes. Hierarchy of controls have been followed and signage in support of controls displayed.

## 83. Hazard Identification

Hazards identification has been included in the Health & Safety Register of Legislation.

#### 84. Health and Safety Register of Legislation

Activity	Hazard	Risk	Preventative measures	Legislation
Operating print and print finishing equipment. Folders Mailer Stitcher Drill	1. Moving mechanical parts & in-running nips 2. Solvents and Chemicals 3. Machine and equipment noise. 4. Gantry and walkways 5. Handling paper and supplies 6. Drill head becomes hot in-use	1. Entanglement and crushing 2. Ingestion, inhalation and absorption. Contact with skin-dermatitis. 3. Noise induced hearing loss 4. Slips, trips and falls 5. Manual handling-muscle and back strains 6. Burn.	1. Interlocking and fixed guards, automatic cleaning and set up functions. Training and SWPs. 2. Automatic cleaning, safer alternatives solutions & PPE. 3. Noise surveys and PPE (folders acoustic hoods). 4. Good housekeeping 5. Handling aids and manual handling training. Solvent pumps. 6. Fixed guard and operator training.	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999 Noise Regs 2005 CoSHH 2002 PUWER 1998  and PIAC best practice guidance.
Binder Additional factors	1. Hot glue pot 2. Three knife trimmer blades	1. Burns and scolds 2. Amputation and cuts		As above
GST Additional factors	1. Three knife trimmer blades	1. Amputation and cuts		As above
Guillotine Additional factors	1. Guillotine blade and clamp 2. Paper handling	1. Amputation and cuts	1. Daily operator checks, competence of operators. 6-monthly electrical checks. 2. Extensive manual handling aids.	As above
3 knife trimmers (stand alone and inline)	1. Three knife trimmer blades	1. Amputation and cuts	1. Photoelectric beam upgrade.	PUWER 1998
Warehouse Additional factors	1. Forklift trucks 2. Working at height 3. Objects stored at height	1. Impact/collision injuries 2. Falls 3. Falling onto persons.	1. Training of Forklift truck drivers. 2. Working at height policy 3. Kick boards	As top Working at Height Regs 2005 LOLER1998
Yard Additional factors	1. Motorised vehicles	1. Impact/collision injuries	1. Traffic controls	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999
Office areas	1. Trilling leads. 2. Workstation.	1. Slips, trips and falls 2. WRULDS	1. Good housekeeping 2. Varied tasks and adjustable equipment.	As top
Prepress Additional factors	1. Trailing leads 2. Plates	1. Slips, trips and falls 2. Cuts & manual handling	1. Good housekeeping and cable sleeves	As top
Laminating Additional factors	1. Film rolls. 2. Heated roller	1. Manual handling 2. Burn	1. Hoist 2. Guarded during operation.	As top

#### 84. Health and Safety Register of Legislation (cont.)

Activity /Area	Hazard	Risk	Preventative measures	Legalisation
Maintenance	1. Working in close contact with machinery/equipment. 2. Unusual activities and situation 3. Solvents and Chemicals 4. Using portable electric equipment 5. Working at height	1. Entanglement and crushing	1. Use guards , isolate equipment (where possible)	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999 Working at Height Regs 2005 Noise Regs 2005 CoSHH 2002 PUWER 1998
Electricity	1. Fixed installation 2. Portable electric equipment 3. Static electrical equipment	1. Electric shock 2. Electric shock 3. Electric shock	1. Fixed installation survey 2007. 2. Ongoing PAT testing. 3. Maintained by suitably qualified contractors/staff.	Electricity at Work Regs 1989
Gas	1. Gas boiler	1. Gas leak - inhalation, explosion an/or fire	1. Regular maintenance	Gas Safety (installation and use) Regs 1998
Emergency Situations	1. Fire 2. Flood 3. Gas leak 4. Asbestos breakage	1. Burns and smoke inhalation. 2. Electrical shock and drowning 3. Inhalation, explosion an/or fire 4. Contact and inhalation - Asbestosis.	1. Compliance with regulations and company procedures.	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999
Unusual Situations	1. Adverse weather 2. Night time deliveries.	1. Disruption to procedures particularly in outside areas, reduced visibility and icy conditions under foot.	1. Yellow flouroscent jackets issued to warehouse/maintenance staff and traffic controls. 2. Additional external lighting.	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999
IPA usage	1. IPA included in dampening solution. 2. Transfer of IPA to 25 ltr drums 3. IPA delivery and storage	1. Inhalation. 2. Splashes to skin and eyes and manual handling. 3. Fire/Explosion	1. Reduction in IPA percentage within dampening solution. 2. Pumps and PPE 3. Delivery procedures.	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999 CoSHH 2002
Asbestos	1. Areas of roof material	1.Contact and inhalation -	1. See Asbestos Policy	Control of Asbestos Regs 2006
Ink usage	1. Ink applied during print process. 2. Ink delivery and storage	1. VOC emission. 2. VOC emission and fire.	1. Vegetable based inks used. 2. Vegetable based inks used with reduced amounts of flammable oils.	CoSHH 2002
Remote Workers Delivery and Sales Staff	1. Road traffic incidents 2. Illness and general well being.	1. Serious collision injuries. 2. Tiredness and general safety.	1. Public transport and carriers used for long distances. 2. Mobile phones and Satnav devices. Home working possible for Sales and other administration staff.	Health and Safety at Work Act 1974 Management of Health & Safety Act 1999

#### Priorities

1. Protect employees from injuries from moving parts and solvents and chemicals by reducing the need to be in close contact with equipment by improved technology and training.	2. Reduction in manual handling risk to employees by upgrading of manual handling aids and training.	3. Reduction of risk caused by faulty or poorly maintenance practices by documenting and recording competency of staff.	4. Identify those members of staff that drive as a significant part of their job role. Sub divide these in Drivers and Part Drivers. Review the mileage that these individuals drive.
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### **85. Approach to Process Development**

Generally, across a range of processes both manufacturing, procedural and policy a step-by-step practice is followed. This approach is designed allow systems to be measured, reviewed and amended using valid information and detail, and would include; Initial Review, Policy, Planning, Implementation, Monitoring and Auditing, Management Review and development of continuous improvement through objectives & targets and alterations to procedures, practices, introduction of new policies and processes and refinement of existing aims.

### **86. Social Dimension & Relationship with Employees**

Cambrian Printers place a great deal of emphasis on developing employees and providing the opportunities for them to develop their career within the company. The company organises its own in-house courses using Cambrian Printers' employees that have the necessary experience and qualifications. Currently we are working with our local training provider to provide NVQ levels 3 and 4 training with several employees. All employees are given regular appraisals where they are encouraged to develop their skills, and receive further training. This can be directly related to the role they undertake, or additional skills such as first aid training. External agencies such as Swansea University and the BPIF (British Printing Industries Federation) are contracted either as sole providers or within partnership arrangements. Added to this Cambrian Printers has its own on-site City & Guilds Qualified Assessor and Expert Witness to support its NVQ candidates. The company are members of the Ethical Junction.

Cambrian Printers have taken part in several work experience initiatives for local school children, including those specifically with special needs or medical conditions, and those taking part in schemes such as the Duke of Edinburgh award. We also take part in job fairs in the local community such as those in the university, and a number of our employees are University of Wales Aberystwyth graduates, and local school leavers. Several of these employees have come to us through Go Wales which is a scheme which places graduates and students with the company to undertake work placements. The scheme also provides support funding for graduates within the company to continue their professional development through training.

The company has several volunteer coaches, coaching local football and karate clubs and previously St. John's Ambulance officers. Many of the directors and senior managers serve on professional bodies as un-paid experts in their field. The company looks favourably on any individual's requirements for community service on a case by case basis

Cambrian Printers have a good standing within the local community, and support local sports clubs such as Aberystwyth Rugby Club. We also support a local cycling club with the use of company facilities.

Arrangements exist in the company to promote employee involvement and internal communication. The company operates an extensive intranet system with full MIS system with input possible from all workstations in production areas. We have involved employees from across departments in the various groups and meetings which cover a range of subjects. A suggestion box (both a physical box in the canteen and a digital "box" accessible through the intranet) allows staff ideas to be considered.

The company complies with all Employment Law requirement. In many cases the conditions in-place in the company are in excess of the BPIF/UNITE National agreement. The company holds annual appraisals, ongoing training reviews and real time production data is analysed.

The company offers a sports and social club, which organises trips and events throughout the year; a sick scheme; a pension scheme; £125.00 towards dental and optical expenses per employee per year; work wear; a cycling initiative, interest free loan of £250.00 per employee per year to purchase a new or re-conditioned bicycle.

Cambrian Printers offer an attractive employee's pension scheme for all permanent members of staff.

### **87. Cambrian Printers' Waste Streams**

In keeping with Waste Hierarchy best practice the company aims to reduce the amount of raw materials that are used/wasted within the production process. Total throughput of paper is assessed against paper lost during manufacturing.

#### **Paper**

Waste paper is collected by a local licensed company. All inks, glues, etc. are washed out with soapy water, a process, which is helped by the proportion of magazine type paper as opposite to lower grade paper types such as newsprint in the mix. Magazines type papers contain clays that help to lift inks during washing. Cleaned paper pulp is sent to a papermaking mill for inclusion in the paper making process. WASTE TRANSFER PARTNER - Parry & Evans

#### **Water Based Coatings**

Water is extracted leaving just 5% non-recyclable solid to go to landfill. The remaining 95% water can then be re-used and is returned to the relevant watercourse.

WASTE TRANSFER PARTNER - J&G Environmental

#### **Coating Wash Water**

When cleaning of the water based coating applicator has been completed we have been granted authorisation, by Welsh Water to discharge this water to the foul sewer if certain criteria are followed.

#### Aluminium Litho Plates

Printing plates can be re-melted - using only around 5% of the energy used in primary production - and can be recycled time and again without loss of quality. Through Duty of Care visits it has been established that the companies printing plates either are remade into plates or enter the automotive industry for re-melting for engine block production. WASTE TRANSFER PARTNER - J&G Environmental

#### Chemical Containers

Good condition drums are washed and re-used, damaged drums are shredded and reused into items such as motorway drainage pipe. WASTE TRANSFER PARTNER - J&G Environmental

#### Gum Arabic

Collected, stored and decanted. pH Adjustment Process carried out. Hazardous components are converted into an inert sludge and non-hazardous liquid. The liquid is then further processed before being returned to the relevant watercourse. WASTE TRANSFER PARTNER - J&G Environmental

#### Machine Oil

Gravity separation process carried out. pH adjustment process carried out and any water/alcohol removed. The oil can then either be used as low-grade fuel oil or after biological treatment is carried out, 5% residue goes to landfill and the remaining 95% can be re-used. WASTE TRANSFER PARTNER - J&G Environmental

#### Aerosols

All empty cartridges are sent for metal recycling, any full or part full aerosols are sent to hazardous waste landfill, this would be an extremely rare occurrence as we endeavour to recycle all aerosols. WASTE TRANSFER PARTNER - J&G Environmental

#### Fluorescent Tubes / Lamps

A special recycling process allows all glass, aluminium, metals and mercury to be recycled. Fully compliant with the WEEE Directive. WASTE TRANSFER PARTNER - J&G Environmental

#### CTP Developer

Collected, stored and decanted. pH Adjustment Process carried out. Hazardous components are converted into an inert sludge and non-hazardous liquid. The liquid is then further processed before being returned to the relevant watercourse. WASTE TRANSFER PARTNER - J&G Environmental

#### Blanket Wash

Decanted, stored and treated. Reclaimed Petroleum re-used as third grade fuel by licensed contractor. Hazardous components are converted to an inert sludge and non-hazardous liquid. WASTE TRANSFER PARTNER - J&G Environmental

#### Sharps

Scalpel blade tips are stored safely within yellow purpose built containers, prior to collect and safe disposal. WASTE TRANSFER PARTNER - J&G Environmental

#### Fount Solution

Decanted, stored and treated. Reclaimed Petroleum re-used as third grade fuel by licensed contractor. Hazardous components are converted to an inert sludge and non-hazardous liquid. WASTE TRANSFER PARTNER - J&G Environmental

#### Inks

Any flammable portion can be used as fuel to start blast furnaces, or as a low-grade fuel. Vegetable oil based Inks are put through a solidification treatment process to produce low-strength cementation. WASTE TRANSFER PARTNER - J&G Environmental

#### Solvents

Decanted, stored and treated. Reclaimed Petroleum re-used as third grade fuel by licensed contractor. Hazardous components are converted to an inert sludge and non-hazardous liquid. WASTE TRANSFER PARTNER - J&G Environmental

#### Landfill Waste

Non-hazardous waste and waste not subject to segregation is removed from the company premises and disposed of at the municipal landfill site. The company is committed to reducing landfill waste to the lowest amount possible. WASTE TRANSFER PARTNERS - Ceredigion Waste Services and Aber Skip Hire

#### Cardboard

Cardboard recycling involves soaking in water and agitating to release fibres, turning them back into pulp. Metal and ink contaminants are removed, additional finishing chemicals are added; the pulp is pressed into sheets and dried. Although the fibres get shorter each time they are pulped, cardboard can be recycled four or five times before fibres degrade and disintegrate. Recycled cardboard makes more boxes and packaging and a range of other uses including stationery and animal bedding. WASTE TRANSFER PARTNER - Aberystwyth Recycling Company

#### Aluminium Drinks Cans

Cans are sorted, bagged and taken for crushing into large blocks, and sometimes shredded for re-processing. Melting removes all inks and coatings before metal is made into ingots. Ingots are sent to mills where they are rolled into sheets ready to manufacture new drinks cans. WASTE TRANSFER PARTNER - Aberystwyth Recycling Company

#### Printing Blankets

Rubber printing blankets are washed and recycled for the equestrian arena where there are used as protection on jumping poles or as sheets lining indoor schools to prevent horses from injuring themselves if they come into contact with the walls of the school. WASTE TRANSFER PARTNER - J&G Environmental

### Plastic Pallet Wrap

Two main types of plastic are recycled: basically clear and opaque. These are chopped into flakes, formed into pellets, and then melted down for manufacture into various new products - although the material will not be used to contain food or drink. Instead hard surfaces for furniture are made or flexible drainage pipes; and high quality fleece, which can be incorporated in outdoor clothing. WASTE TRANSFER PARTNER - Aberystwyth Recycling Company

### Food Waste

Food waste goes into our on-site wormery. A tidy, no-smell way to dispose of organic waste. Teabags, odds and ends of apple cores, leftover sandwiches etc are collected for transfer to the wormery. Within weeks you get liquid plant food and in months you get fantastic compost.

### Redundant Mobile Phones

We recommend that unwanted handsets are donated to Oxfam who re-sell them to a recycling partner, Corporate Mobile Recycling Ltd, who checks and tests them. Broken handsets are dismantled and the parts are recycled in the European Union and working handsets are sold on as second hand phones and are re-used in countries around the world. WASTE TRANSFER PARTNER - Oxfam

### Ink Tins and Cartridges

Collected for cleaning and raw material reclaim. WASTE TRANSFER PARTNER - J&G Environmental

### Wooden Pallets

Various size pallets are collected from our site by local transfer partners. Many are repaired and re-used as pallets or used as fencing, some pallets will be used as fuel and after burning the nails are collected and recycled. The best quality pallets can be reclaimed to manufacture wooden products such as compost bins and even garden furniture & buildings (see picture below). WASTE TRANSFER PARTNERS - Fred Crouch

### Electrical Equipment

Generally it is not practical to refurbish the equipment to be re-sold. In this case it will be broken down to component level for re use or, if that is not possible, it will be broken down to the material level for raw material recovery. Redundant computers, monitors and associated equipment such as printers, mice, keyboards and all other IT equipment waste is collected and disposed of in accordance with the WEEE Directive. WASTE TRANSFER PARTNER - J&G Environmental

### Cleaning Wipes

Wipes are cleaned and returned for re-use until the cotton fabric is exhausted. The wash water is treated during the cleaning process at our waste transfer partner's site and discharged to drain under consent from the water authority. Solid waste from the effluent treatment is taken to licensed landfill sites. WASTE TRANSFER PARTNER - Business Textiles Services Ltd



## 88. Business Continuity Plan

### Policy

As part of an overall risk management strategy, it is the policy of Cambrian Printers (the Company) to safeguard, through Business Continuity Management (BCM) activities, the interests of key stakeholders, its reputation, brand and value creating activities. BS25999 will be used as a reference point for good practice.

The Company will ensure that appropriate strategies are developed to promote resilience and capability to recover value creating activities in the event of their interruption. Such strategies will arise and be developed in conjunction with ongoing Risk Assessment (RA) and Business Impact Analysis (BIA), leading to Recovery Time Objectives (RTO).

It is the aim of the Company that customer Service Level Agreements may be maintained in the event of Business Interruption. The Company will consider BCM in the development of new products, services or processes.

The plan document and the related strategies will be subject to scheduled review but also as and when key factors change. The plan document and related strategies will be subject to testing routines.

### SCOPE

BCM activities within this plan document shall apply to all production and support related processes at the single Cambrian Printers site at Aberystwyth.

This plan does not cover 'commercial' risk for example loss of specific sales revenues or risks which might be identified through risk analysis models such as PEST.

### PROCESS

This plan document and all related strategies have been developed with the full involvement of a multi-disciplined company team covering all areas of the Cambrian Printer's operations. Input has been sought from this team and other employees in the completion of BIA and RA.

As an outcome of BIA and RA and with appropriate guidance, appropriate actions or strategies have been developed to fulfil the following:

1. to remove or reduce risks identified or to provide contingency where potential risks cannot be effectively managed
2. to identify through BIA, key value creating processes and to establish current capability for recovery relative to required timescales for recovery
3. to identify the coping strategies and resources necessary
4. to assign responsibilities for specific elements of the plan.

Risk Assessment and Business Impact Analysis Registers have been conducted and used as an input to the development of this plan document.

Any training needs will be logged within the Company Training Plan. Training should take account of the skills and knowledge needs of the management team and workforce.

Should the need arise, specific elements of the plan may be implemented in part (for a particular department or process) or for the business as a whole according to the level of the event/disruption. In the case of a total loss of premises, all departmental/process plans would be invoked in conjunction with wider business recovery strategies.

Overall responsibility for Business Continuity Management at Cambrian Printers - Chairman and Managing Director, R Read

### AREAS OF CONTROL

For the purposes of the plan, the company is divided into designated areas of control/departments. A designated Emergency Control Team (ECT) will exist with names individuals responsible for each area. Persons responsible will be able to second/allocate personnel who normally report to them, as the situation requires.

The ECT will be responsible for determining the appropriate response according to the incident level (below) and for ensuring their element of the plan is maintained, invoked and implemented effectively.

### INCIDENT LEVELS - ASSESSMENT AND ACTIONS

Prior to invoking any element of the Plan it is essential that assessment be made of key business processes (including reference to BIA) and actions prioritised by the ECT. Assessment should be made as to the potential\* or projected incident classification (as below) for key processes including those identified in BIA.

\* Note: consider potential for increased incident level i.e. if situation escalates or changes.

Immediate consideration must always be given to Health and Safety of employees and workers. If appropriate, areas of the site or the site as whole must be evacuated inline with the company Evacuation Procedures and employees accounted for. Following Health & Safety considerations environmental issues such as escape of waste products, leakage of solvents and fuel and oils held on site will be dealt with by designated persons. Acting in a common sense manner based on the circumstances encountered. Provision has been made to re-locate the company's communications centre to a local remote site (as necessary). An on-site and off-site team have been identified (with alternative appointments should original persons be unavailable).

The tasks and duties of the teams will broadly follow directorial responsibilities. The departmental teams will assist with operations considered necessary in the prevailing conditions and circumstances.

Risk Assessments have been carried out to identify risks to ICT and retention of integral customer data. Outline plans have been formulated to take account of varying degrees of critical situations.

