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# Pollution Prevention Plan

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# Pollution Prevention Plan

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# Pollution Prevention Plan

## INTRODUCTION

Fibrus Group specialises in building and providing fibre broadband networks for both rural and urban communities across the United Kingdom and Ireland. The group is committed to delivering fast, reliable fibre-optic broadband to remote and hard-to-reach areas. While Fibrus Group prioritises sharing access to existing telecom infrastructure to install fibre-optic cables and provide high-speed internet to customers across the United Kingdom and Ireland, it also constructs new infrastructure when necessary.

Many of the processes involved in constructing fibre networks carry potential risk of environmental pollution throughout the project lifecycle. These risks include accidental spillages leading to soil and water contamination, emissions from fuel usage impacting local air quality, dust generation, and noise pollution. The Pollution Prevention Plan (PPP) outlines the measures required to mitigate these risks and ensure compliance with environmental legislation and standards.

## PURPOSE AND SCOPE

### 1.1 Purpose

The management of potential pollutants from operations is essential to avoid harm to human health and the environment. This procedure is mandatory on all sites to ensure construction and installation activities are managed in a manner to prevent risk to groundwater, surface water sources, drainage systems and other ecosystems. The purpose of the PPP is to:

- Outline the key policies, legislations and standards relating to pollution control.
- Outline key policies, legislation, and standards related to pollution control.
- Define roles and responsibilities in pollution prevention.
- Specify actions and measures needed to prevent pollution effectively.
- Address accidental and intentional emissions to air, water, soil, and noise.
- Detail pollution control measures applicable to Fibrus Group and its contractors/subcontractors.
- Implement project-specific environmental mitigation measures.
- Incorporate sound environmental practices into all company procedures.
- Demonstrate conformance with the requirements of ISO 14001:2026 as part of Fibrus Group's overall Environmental Management System (EMS).

### 1.2 Scope

The Fibrus Group PPP covers all activities, including but not limited to office work, surveying, groundworks, construction, cabling, poling, warehouse storage, and logistics operations. The plan applies to Fibrus Group staff as well as contractors and subcontractors working on the Group's behalf. It also extends to land and properties leased or temporarily affected by Fibrus Group operations.

This plan will enhance the management of potential environmental impacts across all operations. The control measures outlined will be integrated with existing environmental management procedures that address different aspects of the company's activities. Relevant documents include:

- **PRO-EN-02:** Waste Management and Duty of Care Procedure.
- **PRO-EN-03:** Environmental Spillage Procedure.
- **PRO-EN-05:** De-Watering and De-Silting Chambers Procedure.
- **PRO-EN-06:** Noise Management and Light Procedure.

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## 1.3 Objectives

- Ensure environmental incidents are managed promptly and effectively in accordance with established procedures, fulfilling compliance obligations and minimising adverse environmental impacts.
- Provide guidance on pollution prevention and methodologies for addressing unexpected or accidental pollution events.
- Provide a structured framework for pollution prevention, including the identification, control, and mitigation of risks associated with daily operations and unplanned or accidental events.
- Outline measures for reporting environmental incidents and preventing recurrence, including staff/crew training and awareness programs.
- Promote environmental awareness and competence among staff/crew through training and communication, supporting continual improvement in environmental performance.

## 1.4 Legislation and Guidance

Although most of the project routes utilise existing infrastructure, the construction of new infrastructure may be required in certain sensitive areas, which are protected by statutory legislation and regulations.

Fibrus Group follows adheres to applicable industry standards through established company procedures and the aspects and impacts register. These are aligned with our Environmental Management System which is guided by the principles and requirements of ISO14001.

## 1.5 Company Policies

Fibrus Group has established policies that set operational standards for employees and subcontractors. These policies comply with statutory obligations and align with required management systems.

## 1.6 International Standards and Commitments

Fibrus Group adheres to a range of international standards and commitments at both regional (EU) and global levels. While many EU directives no longer apply in the UK post-Brexit, many of these have been incorporated into UK law. All contractors are required to comply with these regulations as they pertain to their activities.

## 1.7 Linkage of other Elements in the Company with Pollution Prevention Plan

The Fibrus Group PPP is an integral part of the overall Environmental Management System (EMS). It is also incorporated into the project-specific Environmental Management Plan (EMP) and Health, Safety and Environmental Management System (HSE-MS), ensuring comprehensive environmental and safety compliance across all operations.

## RESPONSIBILITIES

Pollution prevention in Fibrus Group operations requires the active participation of all stakeholders, including employees, subcontractors, local authorities, regulatory agencies, and the general public. To effectively prevent pollution, a comprehensive system must be in place that involves information sharing, training, clear designation of responsibilities, monitoring, management actions, and, when necessary, corrective measures.

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Strong cooperation is essential to ensure the successful implementation of the Pollution Prevention Plan, particularly at the site and ground operations level. Developing site-specific operational procedures is crucial to achieving effective pollution prevention.

## 1.8 Company Roles & Responsibilities

In relation to this Pollution Prevention Plan, Fibrus Group staff are accountable for key activities, including:

- Establishing pollution control requirements which meet compliance obligations.
- Providing training and raising awareness among staff and representatives on site.
- Conducting surveillance and ensuring compliance through continual auditing.
- Administering consequences for non-compliance.
- Managing pollution arising from operations across group activities.
- Establishing Contractors and Subcontractors Roles and Responsibilities

### *Head of Build/Operations*

- Ensures adequate resources are made available to implement this PPP.
- Acts as the escalation point for major pollution incidents and notifiable regulatory breaches.
- Ensures planned changes to the build programme, such as new project areas or methods, are assessed under "Planning of Changes" before works commence.

### *Build Managers / Supervisors*

- Ensure the implementation of pollution prevention controls at site level.
- Ensure method statements and risk assessments address pollution risks before work commences.
- Conduct or oversee daily site checks and audits covering spill kits, COSHH storage, dust suppression, and waste storage.
- Ensure Neighbour Notification and night-time work procedures are followed where relevant.
- Report all pollution incidents, near misses, and non-compliances immediately to the ESG/HSEQ Team.

### *Civils /TRR /Installs/Cabling Operatives*

- Implement the PPP and associated procedures.
- Use dust suppression, noise control, and lighting orientation measures correctly, and only when necessary.
- Store and handle fuels, oils, and COSHH materials correctly, using bunded storage, drip trays/plant nappies, and designated refuelling areas away from watercourses and sensitive receptors.
- Carry environmental spillage kits in vehicles and emergency contact list.
- Segregate waste correctly and use designated, signed bins/skips.
- Report spills, leaks, or any suspected pollution immediately to the Supervisors, and assist with initial containment where safe to do so.
- Attend inductions, toolbox talks, and refresher training, and complete plant/equipment checks as required.

### *ESG Team / Environmental Compliance Manager*

- Owns, maintains, and periodically reviews this Pollution Prevention Plan
- Investigates pollution incidents and non-conformances, determines root causes, and manages corrective actions.
- Develops and delivers, or coordinates delivery of, training, toolbox talks, and awareness programmes.

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- Records Waste Transfer Notes, Hazardous Waste Consignment Notes, and liaises with the Waste Broker/Carrier.
- Acts as the primary liaison with regulators (e.g. Natural England and NIEA), Local Planning Authorities, and conservation officers on pollution-related matters.
- Maintains emergency contact arrangements and coordinates emergency response testing/spill drills.

## Subcontractors

- Comply with all relevant Fibrus Group Environmental Control Measures, including this PPP, or, where holding their own Pollution Prevention Plan, obtain Fibrus Group agreement that it meets an equivalent standard.
- Hold responsibility for pollution control on their site activities under the “polluter pays” principle.
- Ensure their personnel are trained, inducted, and briefed on pollution prevention and emergency response, including participation in toolbox talks and stand-down days.
- Hold valid waste carrier licences/transfer notes and comply with Waste Duty of Care obligations.
- Report all pollution incidents and near misses immediately to the Fibrus Group Build Manager/Supervisor and ESG Team.
- Cooperate with Fibrus Group HSEQ/ESG inspection.
- Ensure the availability of spill kits on site all the time.

## IMPLEMENTATION

Pollution management, mitigation, and monitoring measures are essential to prevent pollution during all site operations. Every work activity must consider the risk of pollution, and must include a site-specific risk assessment and method statement. Environmental incidents and actions are logged in the company's management system to monitor trends, gather data on pollution events, and support the development of training programs. This helps to raise awareness and prevent future occurrences. Civil works and cabling activities are continuously assessed for potential pollution risks, with mitigation strategies put in place accordingly.

### 1.9 Pollution Prevention Measures

Table 1 outlines potential sources of pollution during works on site, the likely routes from source to environmental receptor, and the preventive measures implemented to mitigate the environmental impacts of Fibrus Group's activities. These preventive measures are developed in collaboration with work crews, environmental audit findings, and best practices from government guidelines. Site-specific risk assessments and daily audits are conducted to identify any potential or actual risks during operations. A summary of potential pollution sources and corresponding control measures is provided in Table 1.

## Pollution Prevention Plan

| Sources                                                                                                                                                                                           | Routes                                                                                                                                                                | Receptors                                                                                                                                                                                                                                                                                                            | Management                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Potential pollutant sources during the phase of construction covered by this plan, including fuel combustion, exposed soil, fuel storage, concrete/coal tar washouts, desilting, dust rising etc. | Pathways by which pollutants (including soil) could reach the water environment from these sources, e.g. overland flow, field drains, unauthorised pumping            | Parts of the water environment that the pollutants could reach and any particularly sensitive features (e.g. SSSIs/Ramsar/conservation areas, protected species and plants salmon, freshwater pearl mussels etc)                                                                                                     | Various measures outlined through group-level procedures to mitigate the potential of damage to sensitive receptors during the phase of construction.                                                                                                                                                                        |
| Surface Water Run-off                                                                                                                                                                             | Overland flow from bare ground, stockpiled materials, and other working areas into drainage, or off site onto surrounding ecosystems.                                 | Identified designated sites within the Ecological Impact Assessment technical note. These include SSSIs, RAMSARs, SPAs, pSPAs and conservation areas within 2 km of the works Site. Other sensitive areas include EA rivers and flood zone prone areas, National Nature Reserve areas, wildlife protected areas etc. | Provision of spill kits to all vans<br>Use of bunds/plant nappies during works using fuel-powered equipment such as generators<br>Refuelling activities to be conducted away from watercourses, including storm drains<br>Follow guidance outlined in Environmental Spillage procedure                                       |
| Dewatering/Desilting                                                                                                                                                                              | Overland flow into drainage or off site onto surrounding ecosystem.                                                                                                   |                                                                                                                                                                                                                                                                                                                      | All dewatering/desilting activities are to be carried out by qualified individuals/organisations<br>Waste Transfer Notes will be requested from those conducting dewatering/desilting activities                                                                                                                             |
| Plant and fuel / COSHH Materials                                                                                                                                                                  | Spillages from vehicles or, plant equipment's incidents such as leaking/burst and uncontrolled COSHH material into drainage or off site onto surrounding environment. |                                                                                                                                                                                                                                                                                                                      | All vessels that contain fuel or other hazardous materials should be clearly labelled and stored appropriately<br>Provision of spill kits to all vans<br>Switch off equipment when not in use<br>Crews to complete regular plant and equipment checks<br>All issues and incidents to be reported to Plant and Equipment Team |

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|                                                        |                                                                                                                                                                                                                         |  |                                                                                                                                                                                                                                                                                                                                               |
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|                                                        |                                                                                                                                                                                                                         |  |                                                                                                                                                                                                                                                                                                                                               |
| Concrete / Coal Tar / Dust Rising                      | Overland flow of inadequately controlled concrete/coal tar wash waters into drainage or off site onto surrounding environment. Dust arising from ducting activities including concrete cutting and digging on coal tar. |  | Ensure operational staff are trained on the use of the equipment and suppression measures<br>Dust suppressor to be used for all the works that potential result in dust rising and to be onsite all the time<br>Adherence to the updated Streetworks UK Hazardous Waste Consignment Notes to be recorded by the ESG team and Streetworks Team |
| Waste Storage                                          | Inadequate waste storage which may result in waste spreading into surrounding environment.                                                                                                                              |  | All waste to be segregated on site according to their material composition<br>Excavated materials to be used for backfilling to reduce the likelihood of spreading into surrounding environment                                                                                                                                               |
| Fuel burning to power the vehicles / equipment engines | Vibration and release of NOX and CO2 into the air.                                                                                                                                                                      |  | Switch off equipment when not in use<br>Crews to complete regular plant and equipment checks<br>All issues and incidents to be reported to Plant and Equipment Team<br>Adblue to be used in applicable equipment                                                                                                                              |

Table 1: Potential sources, routes, and receptors of pollution, along with their agreed mitigation measures for the management of pollution.

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## 1.10 Staff Training and Awareness

The ESG Team will develop and deliver training sessions to responsible persons within Fibrus Group and subcontractors to enable effective communication channels throughout the system. The following information will be communicated to all staff, contractors, and subcontractors before and during groundworks:

- All personnel must understand the environmental sensitivities at each project site and be aware of their roles and responsibilities.
- Employees, contractors, and subcontractors will be informed about what constitutes a pollution incident, emergency contact information, and the procedures for reporting incidents through inductions, training, and toolbox talks.
- All staff, contractors, and subcontractors are required to acknowledge and adhere to Fibrus Group's environmental management procedures during all works.

## 1.11 Pollution Prevention Emergency Planning

### Emergency Contact Details

A list of emergency contacts for NI and GB are distributed to all relevant staff on an annual basis. The emergency contact list include person relevant to specific departments, as well information for services such as water, electricity, and public emergency services.

### Emergency Response

Fibrus Group has developed a documented emergency response plan for foreseeable pollution incidents (HSE-PR-GR-003 Incident Management Procedure). This plan outlines the actions to taken in case of such events and includes:

- Environmental spill response.
- Responses to containment failures or fuel/oil storage facility breaches.
- Waste management incident response

### Incident Response Plan

The ESG Team will produce an incident response plan that details the necessary information for effective responses to potential pollution incidents on-site. Site Managers or Supervisors are required to report all incidents through the company's management system so that the ESG Team can respond appropriately.

## VERIFICATION, MONITORING & REVIEW

## 1.12 Verification

Verification monitoring of reported pollution incidents will be conducted to ensure proper review of the Pollution Prevention Plan (PPP). Verification will be carried out through:

**Monthly Auditing Targets:** A certain number of audits will be completed within GB and NI each month to gain an accurate impression of the effectiveness of the pollution prevention strategies on on-site works.

**Weekly Reporting:** The HSEQ team will report information on any reported incident in weekly meetings to ensure that knowledge on non-compliance and corrective measures is shared with the group.

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**Annual Audits:** As part of our commitment to attaining our ISO 14001 certification, all documentation and management systems are reviewed at least once a year, allowing for any updates to the system to be officially declared.

## 1.13 Review of Pollution Prevention Plan

The ESG department will periodically review the inventory of potential pollutants and control measures, updating the PPP as necessary. As a minimum, the PPP will be reviewed annually by the ESG Team or more frequently if new information, procedural changes, or legislation updates arise.

Site-specific risk assessments will be conducted daily by field crews, with monthly monitoring to evaluate risks and control measures. Regular review meetings will be held during field operations to discuss associated risks, ensure best practices are followed, and assess the PPP's effectiveness.

## DOCUMENT CONTROL AND COMMUNICATION

- This document is to be reviewed at least annually or upon significant change.
- Approval is documented via digital workflow.
- Controlled copies are stored in a central repository on SharePoint.
- Changes must be logged in the Document Control Register.
- Superseded versions are archived and marked "Obsolete."