



3. ENVIRONMENTAL POLICY AND PROCEDURES

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3.1 Introduction

3.1.1 The Club will take advice and instructions from the parent body, Tata Steel Sports Club's Executive and Tata Steel Strip Products PLC, and its Environmental contractors on Environmental matters.

3.1.2 This section should be read by members, and training personnel, in conjunction with the Club's Policies and Procedures, Risk Assessments and other rules, advice, and notices.

3.1.3 Members, including trainees, have a responsibility to cooperate and comply with the guidance and rules issued by the Management Committee, Club officers, the sailing Management team for the day, and the training team, to ensure best environmental practice whether afloat or on shore.

3.1.4 All members are required to take reasonable environmental care of their own activities and the impact of environmental issues on others and report any breakdowns or defects so that they can be promptly rectified; concerns should usually be reported to the Commodore via the Secretary, or to the Training Principal.

3.1.5 Members must not change or remove anything provided to safeguard the environmental aspects of the Club's activities.

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3.2 Environmental Policy

This environmental policy is set out to promote environmental protection as an integral part of Tata Steel Sailing Club's everyday activities.

Tata Steel Sailing Club is committed to:

1. Creating awareness of the environmental impacts of our Club amongst our members and actively engaging with the membership to avoid these impacts
2. Complying with all applicable environmental legislation and pollution prevention requirements
3. Identifying and implementing strategies to minimise risks to the environment posed by our operations
4. Assigning environmental protection, the same priority as other key Club matters and providing the necessary resources to meet environmental Management targets and objectives
5. Reducing use of natural resources within our buildings and onboard our boats

To implement this policy, Tata Steel Sailing Club shall:

1. Appoint a Committee member to oversee environmental protection and sustainability strategy and activities
2. Include environmental and ethical considerations in purchasing decisions wherever practicable
3. Promote awareness of this policy amongst officers, employees, volunteers, members and other key stakeholders
4. Provide support, training and resources on environmental protection, Club initiatives and relevant legislation as appropriate to Club officers, employees, volunteers, members and other key stakeholders
5. Set realistic objectives and targets for environmental performance, and monitor and review performance at least annually
6. Through development of an environmental plan, identify opportunities to improve environmental and energy use performance
7. Identify and address the needs and expectations of interested parties on environmental protection
8. Conduct a review of this policy annually

Martin Tossell

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Martin Tossell – Commodore

4th January 2026

Date of next review – December 2026

Date of next issue – January 2027 Management Committee Meeting



Environmental Procedures

3.3 Bio-security

There is a non-European shrimp at Eglwys Nunydd Reservoir - *Dikerogammarus villosus*.

Although completely harmless to humans, it does have a seriously adverse effect on UK freshwater life, eggs etc., in fresh and brackish water.

The following measures are in place to minimise the likelihood of sailors and windsurfers spreading this creature to other water catchment areas:

Before any dinghy sailor or windsurfer takes their craft away from Tata Steel Sailing Club.

- No trolley or trailer is to be left in the water when launching.
- All craft must be inspected for shrimp and weed etc., and thoroughly washed with the hoses provided. Pay particular attention to washing sails, masts, and other nooks and crannies such as Topper and Laser mast holes, slots on sailboards etc.
- Trolleys, which have been immersed in the water, need special attention to ensure hollow tubes are flushed through – pay attention to wheels and support cradles.
- Craft and trolley need to be completely drained after washing.
- All sailing gear, including wetsuit boots, buoyancy aids, etc., must be inspected and washed to remove any shrimp
- Visiting powerboats and trailers need to be similarly cleaned before leaving the site, with special attention to bilges and engine cooling systems, which also need to be flushed through.

3.4 Waste disposal

All waste must be disposed of in provided bins and bags.

Material suitable for recycling should be separated from landfill waste and disposed of in a manner so as to enable recycling.

All members are encouraged to pick up and dispose of any litter found on the site including the boat compound and car parking areas.

3.5 Pollution avoidance

3.5.1 Introduction

Tata Steel Sailing Club has this Pollution Control Management Procedure to provide Management and members with a set of guidelines to deal with a pollution incident occurring on the Club premises or as part of a Club activity on the water.

This section includes the TSSC Emergency Response Procedure for pollution incidents.

It is a working document which outlines the actions to be taken in event of an emergency such as a fuel/oil spill, vessel sinking causing pollution, other pollution events. The Pollution Control Management Procedure should be considered as an adjunct of the TSSC H&S

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Emergency Response Procedure for dealing with emergencies arising during Club activities that result in injuries to participants or the public.

There are a number of Club activities that pose a risk of pollution to the surrounding environment. A list of these risks and TSSC's objectives are as follows: -

3.5.2. Risks, Objectives and Control Measures

See Risk Assessments in Appendix 3A

3.6 Environmental Incident Management Procedure

The following scenarios of pollution emergencies will be used as guides for the TSSC response to pollution incidents: -

- Oil/fuel spill on hard surfaces and roadways
- Oil/fuel spill on soils
- Oil/fuel spill on the reservoir

3.6.1 Response to oil/fuel spill on hard surfaces and roadways

Once a spill has been detected it is the responsibility of every TSSC member to firstly ensure their own safety and the safety of others.

Safety First

- Ensure the area is safe to enter.
- Be aware of fumes, approach the spill site from up wind.
- Always ensure personal protection equipment is worn.

Control the Spill

- Stop the source of the spill.
- Upright the drum or stop the pump
- Turn off all ignition sources
- Locate the drains

Contain the Spill

- Use absorbent booms, banks of soil, hoses or any safe objects to surround the spill and prevent the spill from further impacting the environment
- Often with a spill onto a hard surface the spill will travel very quickly in the initial few moments so speed is important
- Prevent the spill from entering drains and culverts which often lead to the environment and can create larger problems
- Dangerous fumes can build up in low lying areas



Cleanup the Spill

- Large pools of liquid should be absorbed with pillows and pads from the TSSC spill kit (located in the fuel shed)
- The remaining spill should be covered with a layer of absorbent granular material (also provided in buckets in the TSSC fuel shed)
- All absorbent materials should be reclaimed and disposed of by bagging for specialized collection
- Only use sand if there is no other absorbent material available.

It is important to try and contain the spill to the road, car park or hardstand because once the spill has reached soil or broken ground the control, containment and cleanup becomes more difficult.

3.6.2 Response to oil/fuel spill on Soil

The first three steps (Safety, Control and Contain the spill) are essentially the same as above although often with spills onto soils there is little sideways movement of the spill after the initial few moments unless the soil is extremely compacted or wet, the spill will soak into the ground.

Clean up the Spill

- Large pools of liquid may be absorbed with pillows, pads or particulate from the TSSC spill kit (located in the fuel shed).
- The used absorbents should be bagged for specialised disposal
- The remaining spill should be covered by a layer of an organic absorbent. Global Peat is the recommended absorbent for this task.

Remediation

- TSSC Management will seek outside assistance from companies on the Tata Steel approved list of contractors.
- Biological remediation is often used to break down fuels, oils and other hydrocarbon products naturally.
- As well as existing bacteria in the soil, there are products that contain hydrocarbon utilizing bacteria and will help to begin the bioremediation process.

Response to oil/fuel spill on the reservoir

Spills of oil/fuel and similar products as a result of mishaps during refuelling boats is one of TSSC's greatest pollution risks, but pollution can also come from drains and runoff from our hard standing areas. It is important to deal with spill as early as possible, before further damage occurs. A spill can escape a confined area due to wind change or a rise and fall of the tide or simply by seepage into the soil.

Safety First

- Firstly, consider safety before attempting to cleanup, as above but also including marine safety e.g. use of personal flotation devices or safety lines.

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Control the Spill

- Upright the drum or stop the pump
- Turn off all ignition sources

Contain the Spill

- If this is a small spill (less than 20 litres) use absorbent booms to surround the spill and bring it slowly to a cleanup site. Remember to join the booms before deploying them.
- If the cleanup site includes the shore, use an organic absorbent.

Cleanup the Spill

- Use “oil selective” absorbent pads, rolls and other like materials from the TSSC spill kit to absorb the spill from the surface of the water
- All absorbent material needs to be collected. The used absorbents should be bagged for specialised disposal
- A pool scoop is useful to reclaim absorbent materials.

If the spill is large (more than 20 litres) the TSSC Management will call in professional help to organize the cleanup of the spill.

Remediation

- TSSC Management will seek outside assistance from specialist companies that are on Tata Steel plc's list of approved contractors

Reporting

Any Pollution incident shall be immediately reported to TSSC Management who will take the appropriate action in terms of the Pollution Control Management Plan and notify Tata Steel plc.

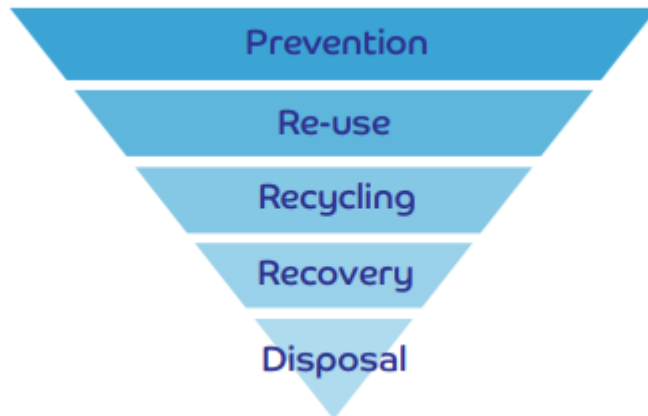
The specific reporting duties of the TSSC are: -

- For an oil/fuel/contaminant spill in the reservoir or on the foreshore, TSSC must notify the Tata Steel plc works



3.7 Environmental Management

Prevention, reusing and recycling are the best ways to tackle this waste and are part of the waste hierarchy (as shown below).



Tata Steel Sailing Club will meet the environmental legislation that relates to the operation of the clubhouse, boat shed, dinghy compound, car park and reservoir and where possible identify opportunities to adopt best practice over and above the minimum legislative requirements.

TSSC will ensure that club safety boats and ribs are fuelled safely and responsibly to avoid spillages and pollution. All safety boats will carry a spill kit. Safety boat drivers will be trained in refuelling good practice and the use of spill kits.

TSSC will minimise the use of electricity in all of our activities. For example; turning off lights, replacing old light bulbs with energy efficient models.

TSSC will minimise the use of water in all of our activities. For example; fitting hoses with automatic trigger nozzles and turning off taps when not in use.

TSSC will minimise the creation of waste. For example; TSSC will only print and photocopy if absolutely essential and then print double-sided. TSSC also use one main printer this saves on ink and electricity.

Where possible, TSSC will use email and text and our TSSC site rather than printed materials to communicate and promote our activities.

TSSC will recycle as much waste as possible by providing adequate clearly labelled bins and increasing our waste and recycling bins and/or collections during busy events. This is constantly monitored

TSSC will provide suitable containers for the disposal of hazardous waste streams.

TSSC will endeavour to take a sustainable approach to running events.

TSSC will publicise our environmental commitment and promote sustainability amongst our members and visitors

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TSSC will take the environmental credentials of our suppliers into account when procuring new products. By doing so TSSC wish to encourage other organisations to integrate sustainability into their operations.

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Appendix 3A – Environmental Risk Assessments

Risk Assessment - **Bio security**

Risk Description	Impact	Score			Risk Controls - Countermeasures	Further Action / Responsibility Target date	Residual Score
		L	I	T			
Natural Resources Wales confirm Dikerogammarus Villosus (killer shrimp) are present at Eglwys Nunydd Dec 2010 Serious risk that this invasive species could spread to other fresh and brackish water courses.	The lake owners goodwill towards the club is at stake.	4	4	16	Notices Most members e-mailed on the subject - initial advice given. Prominent notice on club entrance gate, website, notice board, and in the annual club booklet Invitations to club opens and entry forms to contain a notice Regular meetings / monitoring with the lake owners and Natural Resources Wales	Initial e-mail to members 5/12/10 Natural Resources Wales approval of notices and website given 16 Feb 2011. Follow up e-mail 22/2/2011 Lake owners employees, responsible for reservoir, informed so they can monitor contractors 24/10/11.	4
Shrimp may spread to other water courses by improper washing and drying of sailing clothing.	Killer Shrimps effect on other native species is serious, particularly native fish stocks which could be badly affected by interference with their spawning	4	4	16	Wetsuit boots, wetsuits, drysuits, buoyancy aids and other clothing All those on the water to inspect their clothing after use Members advised in the club notice of the importance of drying kit for 5 days before entering other water courses	Committee members to constantly advise members, new members, trainees, and lake owner for their contractors, on this point. This advice to be given at open meetings in the Race Officer's address.	4
Poor inspection of anything that comes into contact with the reservoir water may lead to the spread of the invasive species.		4	4	16	Dinghies, surfboards, patrol and rescue craft and their trolleys / trailers. No trolleys at all are to be left in the water at time of launching. All craft leaving the reservoir to be inspected for the shrimp, weed etc., and then thoroughly washed with the outside hoses provided, and the craft / trolleys / trailers drained. Boat engine cooling systems to be washed through.	Committee members to constantly advise members, new members, and contractors on this point, and check that craft leaving the reservoir first go through the cleaning process. This advice to be given at open meetings in the Race Officer's address. A killer shrimp / beachmaster officer to be appointed for each open meeting day so that the inspection process is supervised for each craft	4
Introduction of other invasive species into Eglwys Nunydd reservoir	The club would look to advice from Natural Resources Wales who monitor the reservoir	4	4	16	Members to be vigilant especially about craft from Cardiff Bay and Zebra Mussel contamination. Members will be advised on the action to take when the club is informed of other risks.	Powerboats from Cardiff Bay are prohibited from visiting Eglwys Nunydd because of the risk from Zebra Mussels. See also Rules Folder section 2.4.2.	4

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Risk Assessment – Pollution

Risk Description	Impact	Score			Risk Control Countermeasures	Further Action /Responsibility/Target Date	Residual Score
		L	I	T			
Hydrocarbon contamination from storage drums and containers	Pollution	2	2	4	Secure storage Provision of spill kits	Provide/check spill kits	2
Hydrocarbon contamination from spillage during refuelling	Pollution	4	4	16	Carry out operation away from water and open ground Use funnels	Check	4
Pollution of the reservoir from dirty water sources	Pollution	2	2	4	Dirty water to septic tank or drains	Check for blockages and overflows	2
Pollution from storm water runoff	Pollution	2	2	4	Stormwater to drains	Check for blockages and overflows	2
Pollution from boat maintenance and hull cleaning on the work area and ramp	Pollution	3	2	6	Only low hazard cleaning materials to be used Use pressure washer	Check on cleaning materials	2
Noise pollution causing a nuisance and/or endangering the health of neighbours	Noise pollution	1	1	2	Avoid loud noises	Monitor	1

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Risk Assessment – Contamination from dust, fertiliser, herbicides, pesticides and green wastes

Risk Description	Impact	Score			Risk Control Countermeasures	Further Action /Responsibility/Target Date	Residual Score
		L	I	T			
Dust generation from boat, compound or building maintenance	Health and biosphere impact	2	2	4	Use low dust generation methods Water control Dust extraction e.g. vacuum cleaner	Monitor	2
Contamination of the reservoir from fertiliser, herbicides, pesticides, green wastes and erosion	Contamination	2	2	4	Limit use Monitor	Monitor	2
Contamination from stored hazardous and dangerous goods	Contamination	2	4	8	Limit use Secure storage Monitor	Monitor	3
Effluent contamination from septic and associated pipe works	Contamination	2	2	4	Check tank does not over flow Regular emptying	Monitor	2
Asbestos contamination from Club buildings	Contamination	1	5	5	Check for asbestos before work If found use licenced contractor for removal	Monitor	1