

# BIG YELLOW CONSTRUCTION CO. LTD

## Sustainable Procurement Policy

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## 1. Risks and opportunities

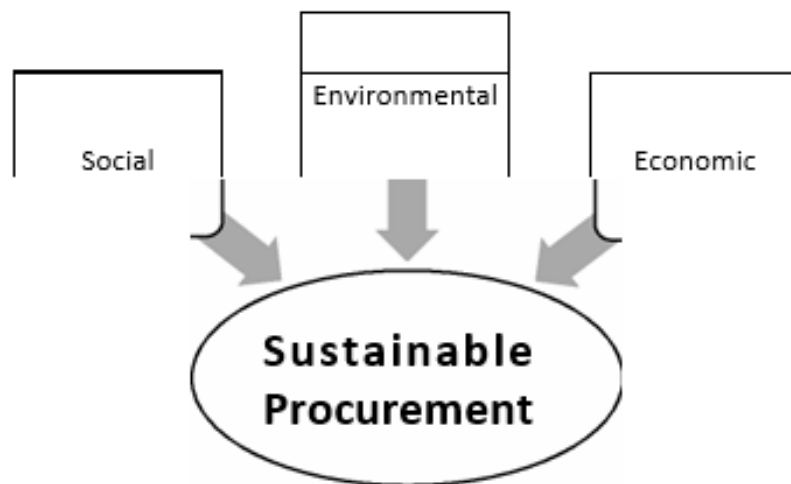
Big Yellow Construction Co. Ltd fully understand the risks and opportunities associated with the sustainable procurement of materials we, our suppliers, main contractors and subcontractors procure for our construction activities.

As a client body, responsible for appointing contractors, we are able to use our purchasing power to benefit the environment, society and economy.

This means BYCC will undertake sustainable considerations alongside the usual criteria of purchase price, quality service and making purchasing decisions that achieve best value for money over the lifetime of the goods, works or service.

Big Yellow Corporate Social Responsibility Policy Statement (which includes reference to the Sustainable Construction Policy) is published on the corporate website

BYCC see the principles of sustainable procurement are:



### **Environmental**

Seeking to minimise any negative environmental impacts of goods and services purchased, across their life cycle from raw material extraction to end of life.

### **Social**

Managing and monitoring supply chains to ensure that fair prices and terms are applied and that are ethical and comply with human rights and employment standards. We have developed and adopted anti-slavery, and inclusivity policies.

### **Economic**

The economic principle relates not only to obtaining value for money, but across the whole life of the product or service, whilst also ensuring as far as is possible under relevant procurement law, that local businesses, particularly small and medium sized enterprises (SME's) can benefit from our procurement processes.

The illustration above shows how sustainable procurement aims to find the balance between economic, social and environmental goals. At BYCC, it is the role of the Construction Director to procure sustainable material solutions that offer equal or better value over their life than the traditional alternatives.

## **2. Certification schemes**

Where it is identified that a material is required which is contrary to the requirements set out in this document and no suitable alternative is available, then a concession must be sought from the Construction Director prior to acquisition order being placed. Failure to seek approval may result in the material or product being removed, disposed of and replaced, with the full cost borne by the supplier or sub-contractor. Retrospective approval will only be considered in exceptional circumstances.

### **Timber**

BYCC suppliers and sub-contractors shall ensure that all the timber they use (including packaging) is legally and sustainably sourced and provide documented evidence to the Construction Director for the inclusion in the Building Record File upon completion.

BYCC will only accept procurement and use of timber and timber products from independently verified, legal and sustainable sources, such as those certified under the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification ("PEFC") or that the forest of origin is licensed by the EU Forest Law Enforcement Governance and Trade ("FLEGT") scheme

In addition, a copy of suppliers and sub-contractors relevant Chain of Custody (COC) certificate number relating to the material supplied must be provided on delivery documentation and subsequent invoice to satisfy BYCC internal policies.

For reused or reclaimed timber brought to site but not specifically purchased, a statement or other guarantee that the timber is reused or reclaimed should be provided on delivery.

All treated timber supplied must have a certificate of treatment supplied and issued to the site at the time of delivery.

Failure to comply with these requirements will result in the delivery being rejected or returned (at the suppliers or sub-contractors expense).

All Wood packaging supplied from outside the UK, from EU countries or Switzerland must be bark-free or kiln-dried and marked "KD" to meet the EU Protected Zone requirements set out in the EU Plant Health Directive or must be ISPM15 compliant.

All wood packaging from Portugal must either be ISPM15 compliant or otherwise marked to show that it was manufactured in another EU member state. Wood packaging from outside the EU or Switzerland must be ISPM15 compliant.

## **Suppliers of All Packaging**

Use of packaging should be minimised and made from materials that can be reused, recycled, or recovered where-ever feasible and give preference to suppliers and subcontractors that offer take back and collection services for their materials and associated packaging for subsequent reuse, recycling or recovery.

Suppliers and Sub-contractors shall make available all pertinent information associated with primary, secondary and tertiary packaging in accordance with the Packaging Waste Regulations. Suppliers and Sub-contractors will be required to take back any packaging deemed excess or non-compliant at their own expense.

## **Suppliers of Steel Products or Components**

All steel for Big Yellow projects must confirm its purchase point and report in accordance with the Public Contracting Regulations.

## **Suppliers of Reinforcement Bar or Reinforced Concrete containing Reinforcement Bar**

We expect all suppliers of reinforcement bar to be aware that it is BYCC company policy that that only carbon steel reinforcement (for use in concrete) adhering to the framework standard for responsible sourcing (BES 6001) is supplied by our suppliers, or associated agents. All steel reinforcement must be specified to comply with BS 4449 or BS 4483.

The supply of loose cut and bent bar must be fully traceable, contain 98% Recycled Content, be CARES & ECO Approved to BS 8666 and is to be obtained from firm(s) holding valid certificates of approval.

Any manufacture of pre-assembled MAG welded fabrications must use reinforcement bar in a specified size range to the relevant requirements of BS7123 and CARES April 2016.

## **Suppliers of Dimensional Stone**

Responsible sourcing of natural stone / primary aggregate products must be evidenced through compliance with a recognised responsible sourcing scheme (e.g. BES6001), certified by a third party. We expect suppliers to be active members in either the Ethical Trading Initiative (ETI Stone Group), TFT Responsible Stone Program, or the United Nations Global Compact and to be members of the Stone Federation GB.

Products supplied should therefore be able to show a clear chain of custody from source to point of use. EU sourced stone will have the appropriate CE Marking and Certification provided with each delivery.

All commercially exploited (UK) primary aggregate shall include the current HMRC aggregate levy charged at the appropriate rate where applicable.

## **Suppliers of Recycled Aggregates**

Suppliers of recycled aggregate must be in full compliance of the duty of care requirements of the Waste Management Regulations or the WRAP quality protocol. Delivery documentation shall state that the product was produced under a quality protocol. The key requirements of the quality protocol are that aggregates must be produced under a factory production control system (quality management system) for them to be considered as non-waste products. Quality system in place, test results – not just recent, should include back log over past year and demonstration of frequency with a quality plan in place.

The Quality Protocol includes the following main requirements:

1. Definitive list of acceptable waste input materials
2. Aggregates produced to a European (EN) standard or other recognized specification e.g. Highways Agency Specification for Highway Works
3. Quality controls for inspection and testing and dealing with non-conforming products
4. Good practice for transporting storing and handling recycled aggregates.

## **Recycled Aggregates - Key Watch Points**

Producer must be able to provide a copy of their factory production control manual. This applies to import recycled aggregates and aggregates produced on site.

Waste acceptance procedures must be defined, and responsible persons identified.

The material produced must conform to one of the standards listed. A formal inspection and testing plan should be defined with sampling, test methods and testing frequencies specified.

Testing results must be provided to demonstrate compliance with the appropriate standard.

Sites receiving recycled materials must ensure delivery documentation includes: A clear product description and specification; and a statement that the material has been produced in compliance with the quality protocol (the statement of compliance with the quality protocol can be included on invoices or on an initial quote).

## **Suppliers of Volatile Organic Compounds (VOC) Products (Such as Paints, Sealants, Adhesives, etc.)**

In the case of unhealthy materials, as far as is reasonably practicable, the supplier or subcontractor shall substitute the material for a healthier alternative.

Preference to products / materials where treatment applications are applied off site. The table over the page lists the limits for VOC, Formaldehyde and other Emissions.

Material/Product	Limits of VOC, Formaldehyde & other Emissions
Form release agents	350g/l VOC content OR water based
Gloss paint for external or high wear use	<50% VOC content OR Accredited under the Finnish M1 label
Primers	<50% VOC content OR Accredited under the Finnish M1 label
Sealants	Water based OR Accredited under the German Blue Angel Eco- Labelling Scheme
Particle boards, Fibreboards, MDF and Plywood.	Zero-formaldehyde boards Isocyanate bound boards Accredited under BS EN 13986:2002 OR accredited under the German Blue Angel Eco-labelling Scheme OR accredited under the Nordic Swan Eco-labelling scheme

### Suppliers of Heavy Metals and Brominated Fire Retardants

Big Yellow expect that all their suppliers and sub-contractors shall, as far as is reasonably practicable, minimise the concentrations of heavy metals and brominated fire retardants in products and packaging being supplied.

The level of certain heavy metals and brominated fire retardants in electrical and electronic equipment is controlled by the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations.

The level of certain heavy metals in packaging is controlled by the Packaging (Essential Requirements) Regulations.

The total content of the heavy metals Cadmium, Hexavalent Chromium Lead and Mercury in packaging or in any packaging components must not exceed 1 00ppm.

Suppliers and Sub-contractors shall keep details on the substances and materials associated with products and services supplied.

### Other Materials

Suppliers and sub-contractors must source products and materials responsibly, taking into account environmental and social impacts and where applicable ensure they are compliant with recognised and credible standards for ethical sourcing i.e. BES6001 or as otherwise defined by BYCC Development Specification and/or Trade Contracts.

Suppliers and sub-contractors should avoid supplying or using materials with a high environmental, social, health or reputational risk, or those that are likely to be limited due to forthcoming legislative requirements. Where possible suppliers and subcontractors should provide declarations on the embodied impacts of their products, by reference to bespoke environmental product Declarations (EPD) or documents such as the BRE green guide to specification or other credible life cycle analysis based tool.

Suppliers and sub-contractors are required to either have their own ISO 14001 certified management system or to manage the operations on our projects in accordance with the

company certified system.

As a minimum requirement suppliers and subcontractors must comply with the company environmental procedures and the site environmental management system (EMS) or plan. Further advice on this can be obtained from the project environmental lead.

Suppliers and sub-contractors are required to identify significant environmental aspects and impacts in their risk assessments and document control measures in their work package.

### ***Red list of materials: Do Not Use***

The following shall not be used within the delivery of any BYC contract or construction of any of our works under any circumstances.

- Alkylphenols
- Asbestos
- Chlorofluorocarbons (CFCs)
- Formaldehyde (added) - The requirement is to eliminate the formaldehyde content in bound boards and products used in internal fit-out and structures.
- Hydrochlorofluorocarbons (HCFCs) - The requirement is to eliminate HCFC use in line with UK legislation
- Polychlorinated Biphenyls (PCBs)
- Phthalates
- Short Chain Chlorinated Paraffins
- Wood treatments containing creosote, arsenic or pentachlorophenol

### ***Grey List of materials: Avoid or Minimise Use***

The following are materials where \*\*\*\* seeks primarily to avoid, or where no suitable alternative is available, to minimise their use.

- Non-FSC or PEFC Timber - The requirement is to Procure 100% of timber products including packaging from recognised responsible sources preferably FSC or PEFC in line with our procedure for Responsible Timber Procurement
- Cement and Virgin Aggregates - The requirement is to maximise the use of cement replacement products in concrete mixes and to maximise the use of Recycled Concrete Aggregate (RCA).
- Hazardous Chemicals - The requirement is to eliminate the use of hazardous chemicals covered by the Stockholm and OSPAR Conventions, whilst ensuring management in line with the European Chemicals Regulations.
- Scarce Minerals - The requirement is to substitute the use of scarce minerals wherever possible otherwise apply the principles of the waste hierarchy to ensure use is reduced or minerals are reused or recycled.

***The following have been identified as being harmful to living creatures and where possible alternatives shall be sought.***

- Bisphenol A (BPA)
- Cadmium
- Chlorinated polyethylene
- Chlorosulfonated polyethylene (CSPE)
- Chlorobenzene
- Chloroprene (neoprene)
- Chromium VI

- Chlorinated Polyvinyl Chloride (CPVC)
- Halogenated flame retardants (HFRs)
- Lead (added)
- Mercury
- Perfluorinated Compounds (PFCs)
- Polyvinylidene Chloride (PVDC)
- Hydrofluorocarbons (HFCs)
- Aldrin
- Chlordane
- p, p'-Dichlorodiphenyltrichloroethane (DDT)
- Dieldrin

### **3. Procurement Activities**

#### **Aims**

Sustainable procurement will not happen by itself, and it is important that the supply chain partners of BYCC see sustainable procurement as an important process.

Within the context of the construction industry, sustainable procurement also requires the whole chain from client to the lowest tier subcontractor to have an understanding and commitment to the sustainability agenda.

Traditional thinking in construction suggests that any such requirement emanates from the client and it is the role of the supply chain to respond to the client's requirements. However, the emergence of more integrated team approaches to projects would suggest that all players in the value chain need to be proactive.

BYCC are responding to this challenge and are increasingly taking responsibility by educating their supply chains, proactively developing sustainable solutions and working with partners to ensure that they are adopted.

#### **Objectives**

BYCC have identified the key elements to the sustainable procurement strategy which are outlined below

- Vision
- Leadership and governance
- Communication
- Training
- Risk & opportunity identification and management
- Embedding sustainability into the procurement process
- Embedding sustainability into supplier management processes
- Supply chain engagement and collaboration
- Measurement, reporting and continual improvement

#### **Targets**

BYCC strive to assess the effect that procurement can have on the environment, the communities affected by its supply chain, the economy and then taking steps to reduce any negative effects and promote benefits wherever feasible.

**4. Sustainably Sourced Materials**

It is a BYCC company policy to actively source materials locally wherever possible. The local sourcing is not just limited to materials but also the appointment of subcontractors, suppliers and consultants.

Locally produced materials are often sought because they match a local design aesthetic and can be more durable in the local climate. However, choosing local materials also supports local economies and reduces the environmental impacts of transportation.

Locally sourced materials may be more cost-effective because of reduced transportation costs, although these savings may be offset by the higher costs associated with complying with more demanding social and environmental legislation.

**5. Monitoring**

BYCC holds has procedures in place to check and verify that company’s sustainable procurement processes are being implemented on individual projects by means of a tracker system, (example extract as illustrated below)

Product	Supplier or Subcontractor	Locally scoured	Correct Certifications held Y/N	Notes
<i>Example</i>	<i>Timbertec</i>	<i>25miles</i>	<i>Yes</i>	

The suppliers and sub-contractors will be requested to provide information to BYCC about a products social, environmental and ethical trade credentials. The suppliers and sub-contractors should be prepared to disclose the locations of all production and warehouse locations fully to BYCC upon request.

The performance indicators developed are used to monitor the company’s progress in meeting its sustainable procurement objectives.



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May 2023