



Hans Clemens
Group Environment Manager
Freightliner Group Limited

Written evidence for Southampton City Council -
Air Quality Scrutiny Panel
January 2015

Dear Louise,

Thank you for your email.

Please see below the following information regarding Freightliner being involved in improving air quality:

- The fact that the main form of transport from and to the port is taking place by rail is in itself already quite a contribution to improving air quality as this is taking vast quantities of lorries off the road every week.
- Rail transport scores between 3 and 6 times better than road transport regarding CO2 emissions per tonnes transported goods per mile.
- Freightliner has a locomotive idling policy in place to shut down loco engines when possible. (Policy attached, appendix 1).
- The policy is enforced by the local terminal manager or his staff. It is in the interest of Freightliner to reduce loco idling as this reduces not only our CO2 footprint but also reduces fuel costs.
- As rail transport is supported by road transport our Freightliner road fleet meets Euro 5 emission standards.

Attached (appendix 2) is some general environmental information on the company.

Kind regards,

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TRACTION BULLETIN -81

DIESEL LOCOMOTIVE IDLING POLICY

19TH NOVEMBER 2007

SCOPE

All Diesel Locomotives operated by The Freightliner Group.

INTRODUCTION

If a Diesel locomotive is going to be left idling and unmanned for more than 30 minutes, then the Locomotive must be disposed of in accordance with procedures, (including removing the BIS) then this idling policy shall apply.

This policy will be implemented at locations where deemed appropriate by the Local Traincrew Depot Manager/Operations Managers.

This policy demonstrates Freightliner's commitment to the Environment by reducing exhaust emissions.

When appropriate, the Freightliner Winterisation Policy, will supersede this instruction.

Any Diesel locomotives exempted from this policy will be identified by a notice in the cab.

Huw Phillips
Chief Engineer
Freightliner Ltd

Alan Tebay
Head Of Operations
Freightliner Intermodal

John Battershall
Head Of Operations
Freightliner Heavy Haul

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Freightliner Environmental Information

All Freightliner business sites that make significant environmental impact are subject to annual environmental audits, carried out in accordance with the company's internal Level 2 Audit Procedure and Protocols.

Environmental audit checklists are tailor-made for each individual site. These sites are subject to continuous environmental monitoring and we strive for continual environmental improvement.

Freightliner Group has a full time appointed Environment Manager Who is responsible for managing Freightliner Group's Environmental Management System (EMS).

Freightliner does not have the ISO 14001 Environmental accreditation. However, we do have an extensive internal Environmental Management System. (EMS), and maintain an Environmental Policy which can be found below as part of this document

This commitment to reducing environmental impact is outlined as part of the Group's Corporate Social Responsibility Policy, which can be found on our external website: www.freightliner.co.uk

Freightliner Group Ltd is proud of its record, with **no** convictions for environmental offences. And **no** environmental improvement or enforcement/abatement notices have ever been served to Freightliner from any regulatory body..

All environmental outputs from the business are closely controlled and monitored. Freightliner is committed to working in an environmentally friendly way and will minimise adverse impacts to the environment as far as possible within best practical means. Should any damage to the environment occur, Freightliner is committed to do all that is required to rectify the damage.

To this end, Freightliner has identified its environmental impacts as follows:

1. Emissions to air
2. Energy consumption
3. Possible spillages of fuel, oils and/or chemicals
4. Possible soil or ballast pollution
5. Possible unauthorised and / or accidental discharges to sewer or watercourse
6. Noise and vibration caused by train movements
7. Noise from terminal operations
8. Dust from coal or aggregate trains
9. Waste disposal

Emissions to air:

- Carbon emission data is monitored as required in the Carbon Reduction Commitment / Energy Efficiency Scheme and is submitted to the Environment Agency. Further carbon emission data including traction energy is available for internal use.
- Various internal projects to reduce energy consumption and related carbon emissions are in place.
- Training in Eco-driving for train drivers and lorry drivers is in place.

Waste:

At all Freightliner locations, waste is collected by licensed waste contractors.

- The waste hierarchy is applied as required and reuse and recycling is encouraged.
- Waste Transfer Notes (Non-hazardous waste) are kept on record for a minimum of two years.
- Waste Consignment Notes (Hazardous waste) are kept on record for a minimum of three years.
- Copies of Waste Carriers Registrations of all waste contractors are kept on record.
- Freightliner Ltd holds a waste carriers license: CB/AM3886LJ

- Freightliner Heavy Haul holds a waste carriers license: CB/TP3094BA
- All Freightliner sites handling waste for customers have got waste management licenses or waste exemptions.
- All Freightliner sites where hazardous waste is being produced are registered with the Environment Agency.

Waste water:

At all Freightliner locations, where waste water / trade effluent is discharged, this is done in accordance with relevant legislation.

- For discharge into open watercourses, a Consent to Discharge issued by the Environment Agency is issued per site.
- For discharge into the local sewer a Consent to Discharge, issued by the local water / sewage company, is issued per site. Site drainage plans are kept on record.
- Where required Oil / Water separators, (interceptors) are installed and maintained.

Sustainability:

- Rail transport is a 'green' means of transport that is at least three times more environmentally friendly than road transport in relation to the production of carbon emissions.
- Energy and water consumption is monitored and reduced where possible.
- Efforts are made to ensure that materials procured, derive from natural sustainable sources wherever possible.

As an added precaution, Freightliner has a contract with external nationwide operating emergency spill response contractor, Braemar Howells. And the role of Freightliner's Dangerous Goods Safety Advisor, (DGSA), has been outsourced to external nationwide operating DGSA advice contractor, Environmental Scientifics Group.

FREIGHTLINER GROUP CHIEF EXECUTIVE ENVIRONMENTAL POLICY STATEMENT

All UK based Freightliner Group Companies shall comply with this policy.

The Freightliner Group is committed to where possible reduce, prohibit and restrict its impact on the environment. The policy applies to all locations and functions therein, and embraces our employees, contractors, visitors, neighbouring industries and businesses.

The Group Environment Manager in conjunction with Freightliner Managers will ensure compliance with all relevant legislation, in order to reduce the risk of pollution by our activities, of land, air or water.

In particular we shall:

- Ensure that Environmental Legislation is fully complied with.
- Environmental management will form part of local managers' safety and environmental checks and the internal audit process. Findings will be used to make improvements and any best practice examples will be shared across Freightliner.
- Measure compliance with above regulations by continuous monitoring and audit.
- Ensure that the findings of any external environmental audit are completed in timely fashion, at a cost that is not excessive to the risk.
- Ensure that emergency plans which are in place, effectively deal with any hazardous goods situation, in order that the risk of impact on the environment is minimised.
- Aim to prevent soil and water pollution by identifying possible risk areas and implementing action plans to control spillage.
- Control emissions into the air by minimising the release of ozone depleting substances and vehicle emissions.
- Maintain the level of noise to as low as is reasonably practicable, in order to minimize noise nuisance.

- Maintain good housekeeping practices by ensuring the work environment is kept clear of debris and waste.
- Encourage waste recycling wherever possible, for paper, metal, oil, scrap etc.
- Conserve energy and other consumable resources.
- Ensure that materials procured are derived from natural sustainable sources wherever possible.
- Ensure that any new buildings are designed and constructed with consideration to environmental matters, with regard to materials, energy conservation and ergonomics etc.

Russell Mears
Freightliner Group Chief Executive