



West Yorkshire  
Fire & Rescue Service

# Environmental Sustainability Strategy

## OFFICIAL

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# 1 Introduction

West Yorkshire Fire and Rescue Service is committed to safeguarding the environment and recognise our responsibilities by managing the impact on the environment and monitoring and improving our systems and processes to prevent unduly affecting the environment.

This Environmental Sustainability Strategy sets out how we will continue to improve the ways in which we use our resources to ensure the least harm to the environment. There are several factors that support the need to have this strategy which include the need to prevent climate change, legislation and costs.

This strategy supports our Ambition 'Making West Yorkshire Safer' and aim 'To improve community safety and wellbeing and reduce the risk to life, property and the environment from fire and other emergencies'.

## 2 Background

Sustainability is defined as avoidance of the depletion of natural resources in order to maintain an ecological balance. It can also be explained as meeting the needs of the present without compromising the ability of future generations to meet theirs and consists of three principles: economic, environmental, and social.

Climate change is an alteration in global or regional climate patterns and became apparent from the mid to late 20th century onwards when global warming became evident. The increase in temperatures worldwide has been attributed mainly to raised levels of atmospheric carbon dioxide produced by the use of fossil fuels and emissions of other greenhouse gases.

World governments have recognised the need to act to halt this and nearly all countries in the world are now parties to the United Nations Framework Convention on Climate Change (UNFCCC). The Convention's purpose is to stop human impact on the climate and requires that the concentrations of greenhouse gases are stabilised, however since it was first agreed in 1992 global emissions have continued to rise. The 2005 Kyoto Protocol to the Framework Convention saw most developed countries agree to legally binding commitments to limit their emissions.

In the UK the Climate Change Act 2008 sets a legal framework for the UK to cut greenhouse gas emissions to 80% below 1990 levels by 2050. It aims to enable the UK to become a low-carbon economy and gives ministers powers to introduce the measures necessary to achieve a range of greenhouse gas reduction targets.

## 3 Objective

Everyone needs to recognise the environmental challenges that are facing the world such as climate change, resource depletion, availability of natural resources for energy consumption and loss of biodiversity.

Most of the work West Yorkshire Fire and Rescue Service does has some impact upon the environment. Of course, this includes all of our operational work, such as attending fires, road traffic collisions and pollution incidents, and dealing with the aftereffects of these incidents and other events – such as extreme weather conditions.

Often, we need to work with other organisations to ensure that the best interests of the environment are considered. For instance, West Yorkshire Fire and Rescue Service and the Environment Agency are guided by a signed agreement entitled “Local Working Arrangements”.

Additionally, we want to raise awareness of environmental issues in other areas of our service: ie our Transport, Procurement, Estates, ICT and administrative functions all have a part to play in ensuring that we are as environmentally friendly as possible.

We will take account of government legislation relating to environmental issues adapting our procedures to minimise environmental impact.

Furthermore, we will also take into consideration the UN Sustainable Development Goals and look to identify those to which we can contribute. Our aim will be to develop and integrate these goals into our working practices to benefit our local communities and stakeholders.

We will promote this strategy throughout the organisation to encourage more effective, efficient and environmentally sound activity and minimise wasteful and damaging practices. Operating in a more environmentally-friendly way often means operating more cost-effectively – saving energy means saving money.

An Environmental Sustainability Action Plan will provide details of work we will undertake to improve the management of the Service’s environmental impact and will be updated and reported to the Environmental Working Group.

## 4 Legislation

In addition to the Climate Change Act 2008 there is a wide range of other legislation that affects our work. Examples of these can be found in Appendix B.

Responsibility for protecting the environment in the UK rests with a number of different organisations at central and local government levels and under the Environment Act 1995 the Environment Agency was set up as the most significant of these agencies in England.

There are duties for fire and rescue services in five areas of environmental legislation: Water quality; Sewage systems; Land and soil; Waste; Nature conservation.

Fire and rescue services can be prosecuted and be liable for clean-up costs if their actions cause or worsen pollution, so it is important for us to be aware of the duties that environmental legislation places on our actions.

## 5 Service Delivery

Climate change has a significant effect on the services we provide and how we provide them. We have seen the impacts of prolonged periods of grass fires in recent summers and the flooding events across many locations within our area. It is imperative that through our Community Risk Management Plan (CRMP) we consider how we can improve and adapt the services we provide to enable us to respond and protect our communities against the threats caused by climate change. To support this, we need to ensure we deliver our services with the least impact on the environment through energy and pollution control and environmental protection measures.

We are committed to working with partners such as the Environment Agency, Canal & River Trust and the National Trust to prevent emergencies before they can damage the environment and to provide education to the public. We will continue to ensure our staff are well equipped, highly skilled and trained to respond effectively to resolve a wide range of incidents which could impact on the environment. Through the community risk management planning we will continue to place resources in locations where they are most needed to react to climate driven emergencies and mitigate the impact to the environment.

## 6 Our Journey So Far

We have been conscious of our impact on the environment for years and have put in place many initiatives to support our contribution to sustainability and environmental impact. In 2007 we set up the Environmental Working Group attended by managers across the Service who contribute to ensure the Service is doing what it can to support the environment. Examples of what we have done so far on our journey towards becoming more environmentally effective include the following:

- Utilising modern solutions to new builds ensuring they are more environmentally efficient
- Recycling of paper and cardboard and other materials at all locations in line with local council waste collection schemes
- Recycling textiles and books to raise funds for The Fire Fighters Charity
- Adopting ICT system improvements to reduce paper usage and wastepaper
- Investing in electric vehicles and ensuring all fleet vehicles are euro 6 emission compliant
- Installing electric vehicle charging points at FSHQ and Killingbeck Fire Station and tracking technology in vehicles to monitor driving efficiency
- Reintroduction of Cycle to Work Scheme in 2017-18 that allows the purchase of bikes at a reduced price via a salary sacrifice scheme to encourage staff to keep active and healthy
- Installed LED and/or PIR activated lighting systems at several locations
- Boiler replacements to change deteriorated, inefficient systems at several sites
- Biomass Boiler installed at FSHQ
- Solar panels at Halifax, Todmorden, Fairweather Green Fire Stations and FSHQ BA building
- Procurement process includes request for tenders to include company's approach to sustainability
- New waste disposal contracts procured to ensure ethical and compliant disposal of waste across the Service

## **7 Our Journey to Continuously Improve our Environmental Sustainability Impact**

Our priorities in 'Your Fire and Rescue Service' include a specific priority 'We will promote environmentally friendly ways of working, reduce waste and raise awareness among staff to both fight climate change and respond more effectively to incidents driven by extreme weather events' demonstrating our commitment to continuously improve our environmental impact. We intend to do this across the strategic areas shown below:

### **7.1 Estates**

A large proportion of the opportunities for the Service to reduce its carbon footprint will come from how we operate and maintain our estate. We will utilise dedicated expertise to evaluate our estate which will include identifying and improving our energy usage and reduce our energy loss. Condition surveys are being undertaken which will identify building fabric upgrades and asset upgrades to enable further work to be undertaken to reduce our environmental impact. We will encourage initiatives such as increased solar energy on roof spaces and increased use of recyclables.

### **7.2 Fleet**

The Service operates a fleet of around 340 vehicles of varying sizes to cover all activities undertaken. Most of our vehicles are currently diesel fuelled engines which are maintained to high standards and are in service for many years. The use of vehicle tracking reduces the fleet size and monitoring of vehicle idling time reduces unnecessary emissions. In addition, we only deploy HGV vehicles when required which reduces mileage and fuel usage. We need to better understand our impact on the environment by our fleet and will monitor new technology to improve the environmental impact of our fleet.

### **7.3 Travel**

We will review current requirements for business travel and seek to reduce the level of travel in addition to exploring low carbon methods of transport. Utilisation of remote working has reduced the need to travel to work and meetings and local journeys are undertaken in electric vehicles. Car sharing and joint journeys will be encouraged throughout the service.

### **7.4 Technology**

New technology has a significant role in developing and streamlining working practices which will have a positive effect in reducing our carbon footprint. Flexible working arrangements will support this.

### **7.5 Procurement**

Sustainable procurement involves procuring supplies, services and works with appropriate consideration (at the planning stage) to the Public Services (Social Value) Act 2012 and inherent environmental, economic and social factors.

Our Procurement Strategy and policy aims to protect the natural environment and accordingly our contract specifications and operating procedures aim to ensure appropriate safeguards and avoid any harmful consequences.

Where possible, we will source from ethical as well as sustainable providers and use our buying power to influence improvements across markets that we use.

## **7.6 Waste and Recycling**

We will reduce the volume of waste which is sent to landfill in conjunction with waste contractors / and user dashboards to monitor waste and will continue to increase the volume of waste recycled, alongside considering the whole life impact of items we purchase and use.

## **7.7 Utilities**

We will monitor and manage the use of all utilities; gas, water and electricity across all our locations and encourage reduction in use to protect the environment in addition to lowering of costs.

## **7.8 Communication**

We will provide opportunities for our staff to take part in promoting environmental initiatives via the Environmental Working Group, Staff Suggestion Scheme and normal day to day management within teams.

We will continue to develop and utilise the Intranet to promote the environmental and sustainability work carried out throughout the Service and provide regular updates on the success of the strategy via Service communication channels.

# **8 Action Plan**

Our Environmental Sustainability Action Plan, in Appendix A, provides details of work we aim to undertake to improve the management of the Service's environmental impact. The plan will be dynamic being updated and reported to the Environmental Working Group.

Each action has been allocated a Responsible Officer who will provide an update of progress against each action at the Environmental Working Group meetings.

# **9 Monitoring**

## **9.1 Environmental Working**

The Environmental Working Group will meet regularly to:

1. Provide advice and guidance to the Fire Authority in all matters concerning Environmental issues in line with our 10 environmental commitments as detailed in Appendix B
2. Monitor and record any environmental issues relating to any operational incident of note
3. Monitor and record usage information for the main utilities covering Electricity, Gas and Water and seek ways to reduce utilities usage across the service



4. Monitor and update the environmental licence register to ensure it continues to be fit for purpose and legal
5. Monitor, record and encourage recycling initiatives across the service
6. Offer WYFRS staff a forum to raise concerns regarding environmental issues
7. Review the membership of the group on an annual basis

## **9.2 Fire Authority**

All reports submitted to each Fire Authority and sub-committee meetings include the need to consider the environmental implications of the work being reported.

The Environmental Working Group activities are reported to the Finance and Resources Committee on an annual basis.

## Appendix A - Environmental Sustainability Strategy 2021-23 - Action Plan

Action	Objective	Responsible Person
<b>Estates</b>		
Rebuild of Keighley Fire Station	To provide a modern and more environmentally efficient station starting in 2022	Head of Estates
Environmental improvements and LED lighting schemes at Odsal, Illingworth, Cookridge and Fairweather Green Fire Stations	To improve environmental efficiencies	Head of Estates
Electrical rewiring scheme at Todmorden Fire Station	To improve environmental efficiencies	Head of Estates
New welfare/administration building roof upgrade incorporating improved thermal insulation for Rawdon Fire Station	To improve environmental efficiencies	Head of Estates
Construction of new Fire Service Headquarters at Birkenshaw	To provide a modern and more environmentally efficient Headquarters starting in 2022	Head of Estates
<b>Fleet</b>		
Continue to modernise fleet vehicles up to the highest emissions standard (euro 6 (e))	Renew all front-line appliances by 2026 to latest euro emissions standard	Head of Transport and Logistics
Expand the use of electric vehicles	Extend the use of electric vehicles to light vans and departmental cars	Head of Transport and Logistics
Monitor fleet vehicle use with telematics data to reduce emissions	Produce reports on driver behaviour and vehicle idling	Head of Transport and Logistics
<b>Travel</b>		
Utilise Teams for meetings across all locations	To reduce unnecessary travel and reduce carbon emissions	All managers
<b>Technology</b>		
Continue to provide technology which supports flexible working and reduces the need for manual/paper processes	In line with the Digital & Data Strategy 2021-2025	ICT Service Delivery Manager

<b>Procurement</b>		
Ensure compliant procurement processes are which include enhanced considerations regarding	An increased focus on ensuring we have in place an ethical and environmentally aware and proactive supply chain	Procurement Manager
Place increased emphasis on our supply chain to improve sustainability objectives	Provide improved sustainable goods and services to WYFRS and also adopt practices that minimise their environmental impact and deliver community benefits in relation to their own operations and throughout their supply chain	Procurement Manager
Whole life costing policy compliance	To ensure value for money in goods purchased but also maintenance, re-use and disposal etc	Procurement Manager
<b>Waste and Recycling</b>		
Splitting of waste at source across all locations	To provide more effective waste disposal and recycling	Head of Estates
<b>Utilities</b>		
Monitor use of gas, water and electricity across all locations	To monitor and reduce usage	Head of Corporate Services
<b>Communication</b>		
Review and update Environmental Sustainability intranet site	To provide information to staff regarding environmental sustainability initiatives	Head of Corporate Services
Provide regular staff updates on environmental sustainability	To encourage staff to promote initiatives across the Service	Head of Corporate Services

## Appendix B - Our Environmental Commitments

### Commitment 1

**We aim to comply with, and observe the spirit of, all environmental legislation, regulation and other requirements.**

West Yorkshire Fire and Rescue Service is governed by legislation which means we must operate in a way which is sympathetic to the environment. This legislation includes:

- The Fire and Rescue Services Act 2004
- The Civil Contingencies Act 2004
- The Water Resources Act 1991
- The Groundwater Regulations 1998
- The Environment Act 2021

In all of our activity, we intend not only to fulfil our legal obligations, but also to promote clearly and actively, a positive attitude to the environment.

There are already examples of where our Operational Guidance Procedures make clear reference to the impact we have upon the environment.

### Commitment 2

**We want to ensure that everyone at West Yorkshire Fire and Rescue Service considers the impact their work has upon the environment.**

We have made this document available throughout our organisation. Obviously, we aim – as a minimum - to fulfil our legal obligations. Beyond that, we also actively encourage all Service personnel to think in terms of how energy can be saved in a way that is not harmful to the business.

### Commitment 3

**We will review what we do, both operationally and non-operationally, to identify areas where we can operate in a more efficient, effective and environmentally friendly way.**

This commitment works on two levels. Firstly, whenever a strategy or procedure is reviewed, we will ensure that all environmental considerations are included within it. Secondly, we will ensure that operational debriefs specifically consider whether individual operations were carried out with the highest regard for the environment. The findings of each debrief will be used to inform future operational guidance and future versions of the Environmental Sustainability Strategy.

### Commitment 4

**We will develop an accompanying guide on Energy Conservation, to act as a guide for good practice throughout the organisation.**

To support this strategy, we have developed a guide which will include a list of simple and practical steps to provide savings on water, heating and lighting. It is intended that this guide will be implemented by all personnel at their workplace to support effective use of resources.

**Commitment 5**

**We will continue to look outside of our own organisation for ideas.**

We will continue to research environmentally beneficial solutions which are cost-effective and practicable. We will work with partner organisations to find examples of good, effective practice which we can implement throughout the Service.

**Commitment 6**

**We will encourage our business partners - including contractors and suppliers - to operate in a way which is consistent with our Environmental Sustainability Strategy.**

We will explore ways in which we can ensure that our business partners are aware of our Environmental Sustainability Strategy and that our interaction with them supports the attitudes and beliefs which are at the heart of our strategy.

**Commitment 7**

**We will formally evaluate this strategy initially after 12 months, and then every three years, or whenever we think there might be any significant improvements to make to the strategy.**

We will review this document after 12 months to ensure it is fit for purpose. We will use it to help us plan for the future and incorporate new initiatives, to help us to continually improve. The strategy will include both long and short-term actions and related targets for the coming years.

**Commitment 8**

**We will review the successes and areas for improvement of the strategy annually.**

Each year, we will review how well we have done, and identify key achievements and areas where we feel we can improve. We will make our findings available upon request and communicate them throughout the organisation.

**Commitment 9**

**We will continue with a cross-directorate Working Group to consider environmental issues.**

The working group will be made up of managers from all directorates. Each manager will be responsible for reporting on the environmental performance of their directorate. The group will meet regularly and will be used as a learning resource, with the opportunity to share examples of good practice. It will report on major environmental issues and our effective environmentally friendly activities and performance to the Finance and Resources Committee.

The group will be chaired by the Corporate Services Manager, and nominations for contributors will be sought from each department.

**Commitment 10**

**We will set ourselves targets for reducing the amounts of energy we use.**

Each year we will set ourselves quantifiable reductions in energy use, and we will monitor progress against these targets.

## Appendix C - Legislation

### The Fire and Rescue Services Act 2004

This lists the principal functions of fire and rescue services as fire safety; firefighting; rescuing people in road traffic collisions; and responding to emergencies. It also includes the statutory requirement for fire and rescue services to take any appropriate action if an incident harms, or is likely to harm, the environment, but it does not contain a specific duty or requirement to protect the environment. There are, however, duties for fire and rescue services in five areas of environmental legislation: Water quality; Sewage systems; Land and soil; Waste; Nature conservation.

### The Fire and Rescue Services (Emergencies) (England) Order 2007

The Order places a duty on fire and rescue services (in England) to have the capability to remove chemical, biological, radiological, nuclear and explosive contaminants from people at an emergency. There is also a duty to contain water used for decontamination for a reasonable time. Fire and rescue services must take steps to prevent or limit environmental damage when decontaminating people.

### The Civil Contingencies Act 2004

The Act sets out the duties of certain organisations and as Category 1 responders, fire and rescue services are part of the multi-agency response to civil emergencies. Our role under the act is to save life, and to protect property and the environment. To be an 'environmental emergency' an incident must be one of the following:

- Contamination of land, water or air with a harmful biological, chemical or radioactive substance
- Flooding
- Disruption or destruction to plant life or animal life

### The Environmental Permitting (England and Wales) Regulation 2010

Under these regulations it is an offence to cause or knowingly permit the release of pollution to ground or surface waters. This is unless the release is allowed by an environmental permit or exemption. To cause must involve an active operation or the failure to act. To knowingly permit involves the failure to prevent pollution where there is knowledge of it occurring. The regulations do allow a defence where fire and rescue service actions cause pollution, but strict criteria must be met:

- A discharge is made in an emergency to avoid danger to human health
- All reasonably practicable steps were taken to minimise pollution
- The relevant environment agency is informed of the incident as soon as possible

### The Environmental Damage (Prevention & Remediation) (England) Regulations 2015

These regulations state that fire and rescue services must take steps to prevent or reduce environmental damage. They must notify the appropriate regulator of:

- Damage to a site of special scientific interest
- Damage to species and habitats outside SSSIs that are protected by EU legislation

- Serious long-term damage to ground or surface water (that results in a decline in water status under the Water Framework Directive)
- Contamination of land by substances or organisms that cause significant risk to human health

In normal circumstances there is no defence against a breach of the regulations. However, there are three exemptions to the regulations, these being damage caused by:

- Acts of terrorism
- Exceptional natural phenomena if the operator took all reasonable precautions to prevent them
- Activities which have the sole purpose of protecting against natural disasters, and activities which have the main purpose of serving national defence or international security

The regulator may require fire and rescue services to carry out preventive and remediation measures. It may also be necessary to pay costs for any environmental damage caused. For protected sites and species, a fire and rescue service may be liable if damage is deliberate or is caused by negligence.

### **The Water Industry Act 1999**

This Act states it is an offence to release polluting material into a sewer without having consent from the sewerage company therefore they must be informed when accidental releases occur.

Firewater run-off (including foam) or a spillage must be contained on site and where this is not possible, early contact should be made with the Environment Agency to identify the best option for minimising the environmental impact. If firewater has already entered the foul sewage network, the sewage operator must be informed so they can assess the risk to the treatment process.

If the environment agency and FRS believe that the foul sewerage system is the best disposal option, they must contact the sewerage undertaker as soon as possible to seek approval to do so, or to warn of contaminants in the sewerage system.

### **The Water Resources Act 1991**

This Act regulates water resources, water quality and pollution, and flood defence.

Part 2 of the Act provides the general structure for the management of water resources.

Part 3 explains the standards expected for controlled waters; and what is considered to be water pollution.

Part 4 provides information on mitigation through flood defence.

### **The Groundwater Regulations 1998**

These regulations relate to the prevention of risks to groundwater from certain substances, labelled as List 1 and List 2.

The Environment Agency is empowered to prosecute any unauthorised disposals.



## **The Environment Act 2021**

This Act states the legal requirements for:

- targets, plans and policies for improving the natural environment
- statements and reports about environmental protection
- the Office for Environmental Protection
- waste and resource efficiency
- air quality
- the recall of products that fail to meet environmental standards
- water
- nature and biodiversity
- conservation covenants
- the regulation of chemicals
- any connected purposes