



July 1st 2007 to 30th June 2008

# EMAS – Environmental Statement



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## Turning Around Technology

Regeneris is a leading provider of after sales product support services to many of the World's premier technology brands. If a product fails we will fix it, if the product is no longer in use we will find a new market for it and if it is beyond use we will recycle it safely and responsibly.

During the year to 30th June 2008, we have taken significant steps to improve our environmental performance.

I was appointed as Managing Director of Regeneris Environmental Services in April of 2008 and have been impressed with the level of commitment to environmental excellence throughout our operation. In addition to our continued focus on responsible end-of-life solutions for mobile devices, we are developing new sales and marketing channels. These include web enabled services that we develop and operate on behalf of our clients and enable us to create a direct interface with the end user. With the convergence of technology, we are also extending our services to cover not only mobile communications, but also other high-end electrical products like MP3/4s.

Through these changes, the business continues to promote itself as the partner of choice for environmentally conscious and responsible brands. With the advent of WEEE legislation in 2007 Regeneris continued to operate as a Producer Compliance Scheme, licensed by the Environment Agency. Members include the major UK mobile network operators. The scheme significantly exceeded collection targets in its first year and was able to pass on those benefits directly to its clients. Regeneris maintains UK Government approved licenses for the collection, treatment and export of waste in full compliance with the WEEE Directive.

In addition to the assurance we provide for the environmental aspects of end-of-life management of redundant equipment we are putting a greater emphasis on the handling of personal data. Most products returned will contain such data and there are a number of very high profile cases in the public domain where personal data has been 'lost' through the lack of controls around such equipment.

In a new development we are investing in capacity to ensure that all data is removed from the equipment we process and that this data is then certified as destroyed; something which we believe is unique in the industry. In the short term there is a cost associated with this investment. However, it remains our view that as the public becomes increasingly aware of the risks from the mishandling of their personal data our clients will need partners able to deliver the secure process to evidence removal and destruction. We are confident that our customers are addressing these issues as part of their corporate and social responsibilities.



We also supported many charitable activities, for example we raised £350,000 for the 2007 BBC Children in Need campaign.

We achieved this by promoting a nationwide mobile phone collection campaign. And over the last three years have raised over £920,000 for this charity alone.

In addition to our financial success we have been recognised for our work in developing new markets and have attained two 'Big Ticks' from Business in the Community (BiTC) for Marketplace Innovation and positive Impact on Society. These well regarded awards recognised our outstanding contribution to corporate responsibility and responsible business practice. HRH Prince Charles is President of Business in the Community.

We also supported many charitable activities, for example we raised £350,000 for the 2007 BBC Children in Need campaign. We achieved this by promoting a nationwide mobile phone collection campaign. And over the last three years have raised over £920,000 for this charity alone. We work with many other charities to similar effect and continue to take a responsible attitude to supporting the community.

Mark Franklin  
Managing Director



# Environmental Policy Statement

Protection of the environment is central to our business strategy. Accordingly, we have developed an Environmental Management System that is certificated to ISO14001 and registered with EMAS, the European Eco-Management and Audit Scheme.

Our system has been incorporated into all company operations to ensure that we:

- Provide a fully auditable and sustainable solution that enables whole life cycle management for telecommunications equipment through reuse and recycling, husbanding the world's resources, reducing our emission of Green House Gases, eliminating landfill and protecting the environment
- Manage and minimise environmental risks identified in our processing operations, and support service activities performed at client sites
- Maintain our 100% regulatory compliance record
- Measure and publicly report our environmental performance annually
- Assess the environmental performance of key suppliers, and co-operate with suppliers, customers and business partners to achieve higher environmental standards
- Encourage sustainable development through business example and voluntary endeavours, both nationally and within the local community
- Minimize the impact on the environment of our operations as related to the emissions of Green House Gases (CO2) to help combat climate change.

We shall distribute a copy of this policy to all employees, and to other organisations and the public upon request.

We shall periodically audit our operations for compliance with this policy, and measure progress made in our quest for continuous environmental improvement.

Mark Franklin  
Managing Director  
Regeneris PLC

Reviewed April 2008



## Environmental Management System

Our Environmental Management System (EMS) has been certified to ISO 14001:2004. As a consequence, it has matured and is a part of all company activities.

Our commitment to continuous improvement meant that in 2007/2008, we continued to review the structure of the system.

The Key Elements of our EMS are:

- a. An Environmental Policy for best Environmental practise, copied in full on page 03
- b. A review of all environmental aspects created by our activities and to determine their significance. The aspects are held in a register and subject to annual review.
- c. The creation and six monthly review of all Environmental legislation, ensuring that all duties are met.
- d. The development of a routine audit plan to ensure maintenance of the EMS and to identify any areas for Improvement.
- e. Environmental management review meetings, to review performance and to set objectives and targets for improvement.

We have now completed integrating both the EMS and the Quality Management System (QMS) into one Integrated Management System (IMS). Our IMS operates alongside our Health and Safety system which is designed to meet or exceed current Health and Safety legislation, and our Management Information System (MIS) that links together Company Business systems.

Working together, these systems provide the core for managing all Company operations.

Our IMS provides the structure and basis for Environmental & Business Management within the organisation. The documented system includes those elements summarised in this statement and the control procedures for ensuring continuous improvement of our Environmental & Business performance. The IMS is subject to internal audit and management review.

### Verification statement.

Further to consideration of the document, data and information resulting from the companies internal procedures examined during the verification process at Regeneris, it is evident that the Environmental policy, programme, management system, review (or audit procedure) and environmental statement meet the requirements of regulation 761/2001 (the EMAS regulation) and will be reviewed again in October 2009.

Amanda Thorpe

Verification/Audit date: 22nd October 2008

SGS United Kingdom Ltd, Rossmore Business Park, Ellesmere Port,  
England CH65 3EN



## Direct Aspects of Significance



The Environmental aspects of our operations are identified and recorded in a register. We ensure that significant environmental issues are reviewed each year when setting annual environmental objectives and targets. The register is also regularly reviewed to ensure that new activities are considered and that any previously unidentified aspect is accounted for.

### Re-use of mobile phones and accessories.

The principal activities of Regeneris focus on the reuse of mobile phones and related equipment. Re-use is the highest form of recycling and is promoted by both government and legislation.

Equipment that is not suitable for re-use is recycled through approved recycling companies. All waste products sent for recycling, such as paper/cardboard and plastics, are sent to the recyclers to be used to make new products. We continue to maintain our voluntary ban on landfill disposal, which we implemented in October 2002. Instead, anything that cannot be recycled is despatched for Waste-to-Energy incineration. This outlet provides an environmentally sound solution for materials that cannot be recycled at the moment. A useful by-product of the incineration process is electricity that is used for power.

### Compliance and licences.

We fully met our Environmental legal obligations during the year, continuing our 100% compliance record, which extends to the inception in 2001.

Our facility in the UK is permitted with a Waste Management licence and Regeneris has their own Waste Carrier Licence. In line with the WEEE Regulations, Regeneris has also been accredited with the following licences for the 2007/2008 compliance periods:

- a. Producer Compliance Scheme
- b. Approved Authorised Treatment Facility
- c. Approved Authorised Exporter
- d. Designated Collection Facility

These accreditations enable Regeneris to receive and process WEEE on behalf of their members, and issue evidence in relation to WEEE received, reused and recycled or recovered throughout 2007/2008. Applications for the 2009 compliance period will be completed accordingly.

### What is the WEEE directive

Manufacturers' and companies alike have a legal and financial obligation to ensure that redundant electronic equipment is disposed of under strict new guidelines, the aims of which are to ensure that as much material is recycled or reused from Waste Electrical and Electronic Equipment (WEEE) as possible.

## Direct Aspects of Significance



The directive covers the collection, disposal and treatment of all redundant electrical and electronic goods. Under this broad scope, items as diverse as commercial server mainframes to electrical staplers have to be separated from normal waste and marked for recycling or reuse.

Householders and business in the UK throw at least one million tonnes of Electrical and Electronic Equipment (EEE) away each year, and this figure is estimated to be growing by up to 80,000\* tonnes annually. The recycling and treatment of EEE was not undertaken to a sufficient extent, so the introduction of the WEEE directive is a positive move for the environment.

The WEEE directive aims to minimise the impacts of EEE on the environment during their lifetime and when they become waste. It applies to a large spectrum of products, and helps to encourage and sets out criteria for the collection, treatment, recycling and recovery of WEEE.

### Hazardous Substances

We manage hazardous substances contained in products and equipment seamlessly throughout our business operations. We first assess the products and equipment before they are sent to us for potential hazards in order to identify any hazardous substances (e.g. Cadmium batteries).

During subsequent processing, we follow operational procedures in place to manage and store any hazardous substances and materials securely, pending safe treatment or recycling. As newer technologies appear, we will continue to process with care, identifying future hazards and implementing procedures for their safe management.

### Non-hazardous wastes

There is a small but inevitable residue of material for which there is currently no economic or practicable outlet for its return into productive use. This material typically consists of paper and card, timber and plastics. Any of these materials are separated out for recycling. If they cannot be recycled, they will be sent for incineration to energy.

\*Source: Environment Agency

## Direct Aspects of Significance

### CO2 Emissions/Transportation

More than five years ago, the company had already recognised the growing concern by government and the public at large for the effects of transportation upon the environment. We put a programme into place to minimize transportation effects, including:

- a. Working with a supplier who has vehicles, most of which are fitted with the latest and most efficient diesel engines
- b. All vehicles routinely maintained, which includes checks on diesel engine exhausts to ensure they meet emission standards
- c. Routing of vehicles is worked out using a computerised traffic management programme, minimising mileage and potential hold-ups
- d. Vehicles are subject to early morning starts, minimising delays caused by local morning commuter traffic congestion.

However, all activities using energy contribute to global warming, therefore we not only monitor our fuel consumed by our vehicle fleet, but also estimate by calculation the amount of CO2 generated by our activities. We use this data to take action in order to improve our performance in this area.

With one half of the Eurocourt site using 100% renewable energy, this has decreased our emissions dramatically over the past year. We will investigate the possibility of using the same supplier for the other half the Eurocourt site, thus we would be emitting no Co2 emissions through our electricity usage.

## Indirect Aspects of Significance

Indirect aspects created as a result of our operations are also identified and recorded in a register, and we ensure that significant issues are reviewed each year when setting our Environmental objectives and targets.

Indirect aspects of our activities include those related by our suppliers when carrying out work for us. While many of these aspects are directly our responsibility, we take them seriously, accounting for them in our IMS programme.

### Supplier programmes

Concern for materials processed by our operations extends to beyond our premises and after materials are dispatched from the site for onward processing. We take our 'Duty of Care' responsibility very seriously, ensuring that materials leaving the site are packed and transported safely and in full conformance with environmental and transportation regulations. We carry out on-site environmental audits on our keys suppliers, including organisations receiving materials from us. This checking process provides us with the assurance that the highest environmental standards are being maintained when our materials are transported and subsequently re-processed. During the coming year we will continue to utilise our comprehensive audit checklist to improve our consistent and rigorous evaluation of the environmental performance of our key suppliers.

# Consumption of Resources

EMAS Data - Period 1st July 2007 to 30th June 2008

## Electricity Consumption (Kwh)

A kWh of Electricity is equivalent to approximately 0.523kg of CO<sub>2</sub> (From Defra Website)

	Kwh	CO <sub>2</sub> (Tonnes)
Unit 7	260580	136.28
Unit 2	117595	0.00*
<b>Total</b>	<b>378175</b>	<b>136.28</b>

## Water Consumption

Unit 7 & Unit 2

Total

Cubic Meters  
743  
743

## Diesel Fuel

CO<sub>2</sub> per litre - 2.63kg (From Defra Website)

	Litres	CO <sub>2</sub> (Tonnes)
Transit	11463.58	30.15
Audi	1708.36	4.49
Mercedes	1148.34	3.02
<b>Total</b>	<b>14320.28</b>	<b>37.66</b>

## Petrol Fuel

CO<sub>2</sub> per litre - 2.315kg (From Defra Website)

	Litres	CO <sub>2</sub> (Tonnes)
Mondeo	7237.86	16.76
<b>Total</b>	<b>7237.86</b>	<b>16.76</b>

## Red Diesel

41Kwh Engine against 1.4kg/Kwh, using average 1.5 hrs per day and 250 days per year

		1.4 Kg/Kwh 200 Kg 1200 Hours
Forklift Truck	820	2.16

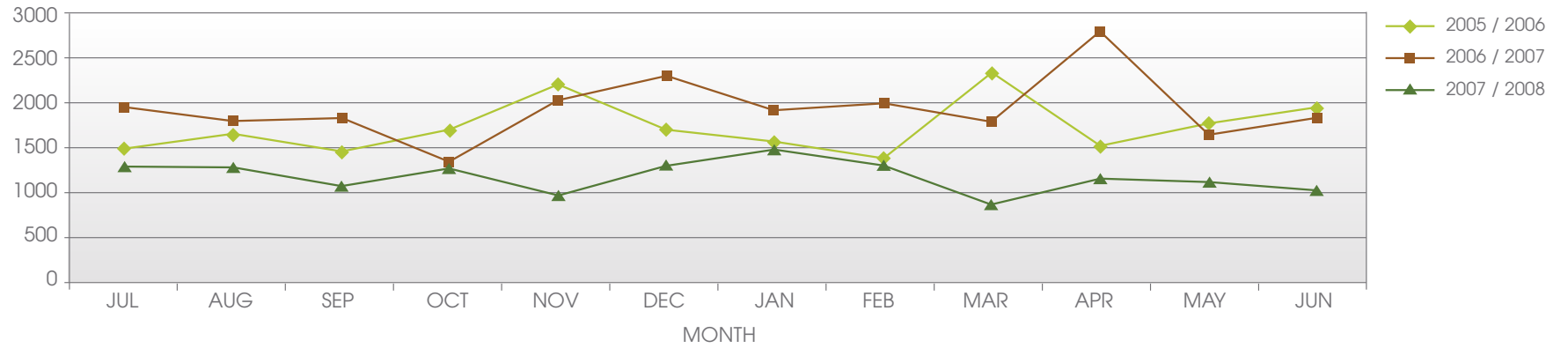
## Total CO<sub>2</sub> Emissions (Tonnes)

(Includes Electricity, Diesel, Petrol and Red Diesel)

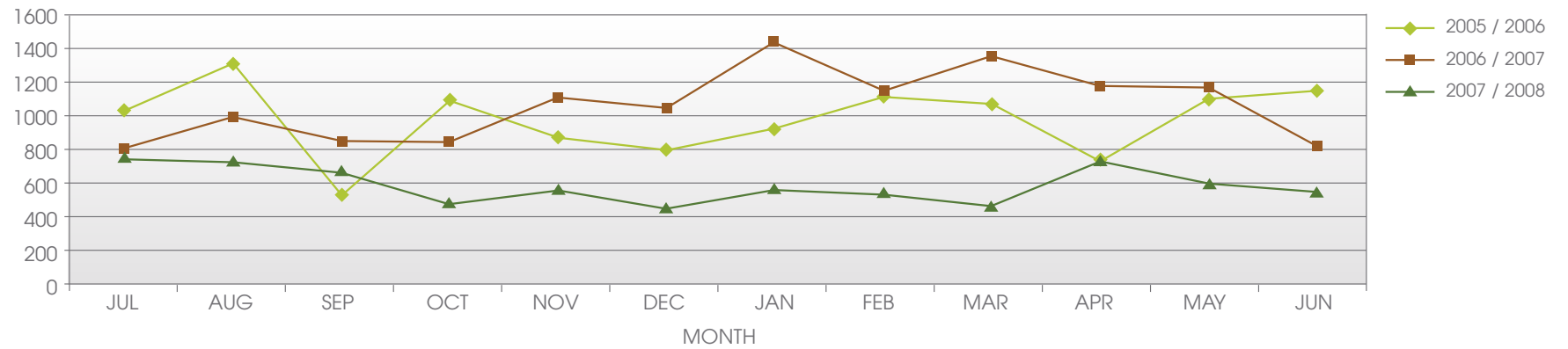
192.75

\* (Unit 2 uses 100% renewable electricity, therefore producing no Co2 emissions)

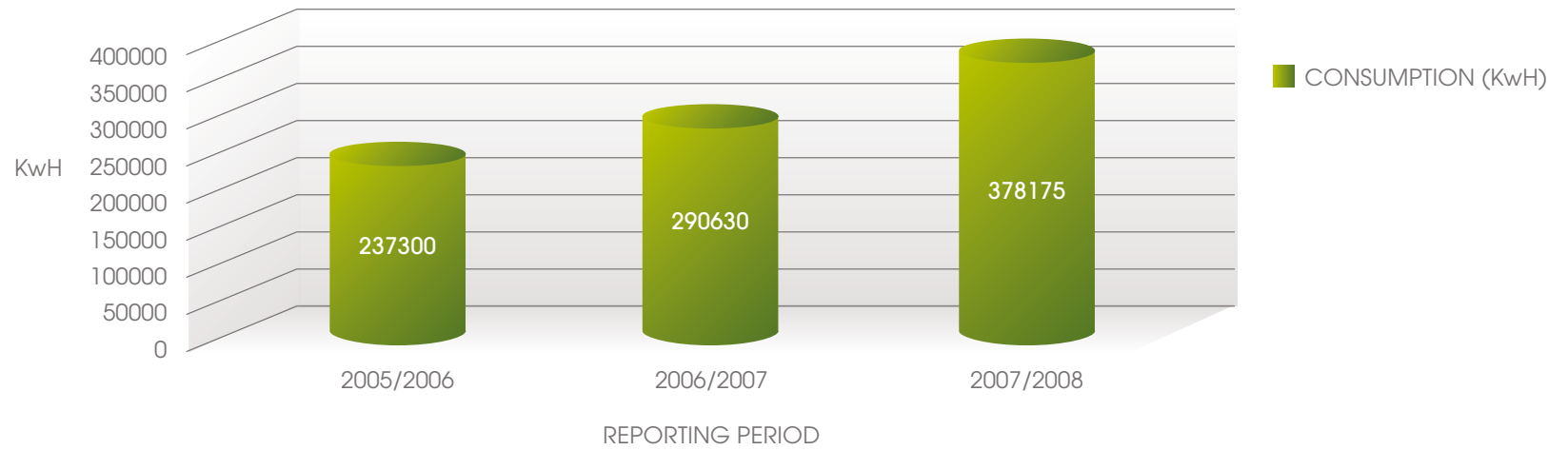
### DIESEL USAGE



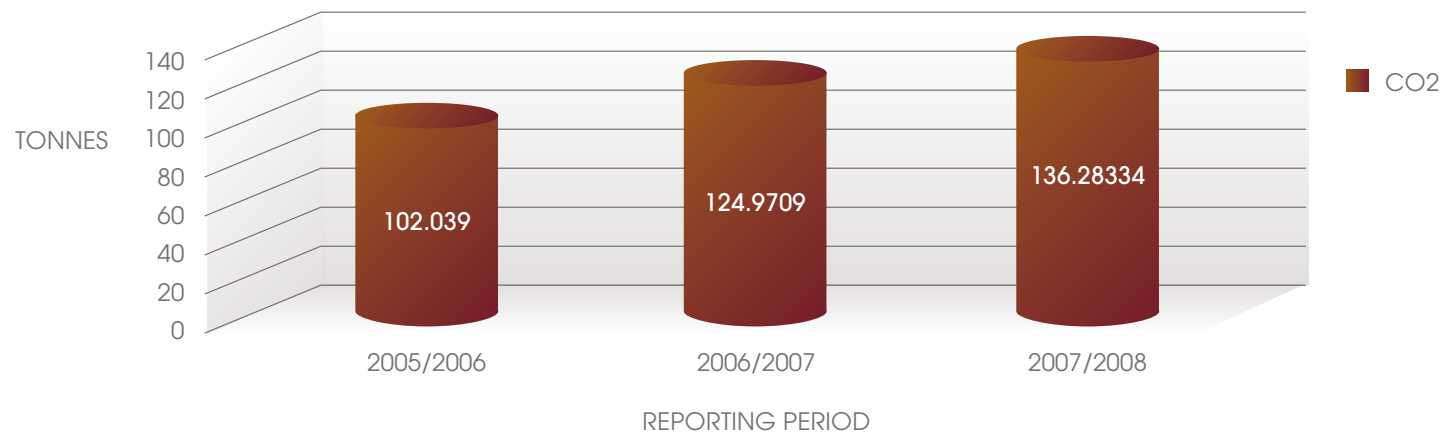
### PETROL USAGE



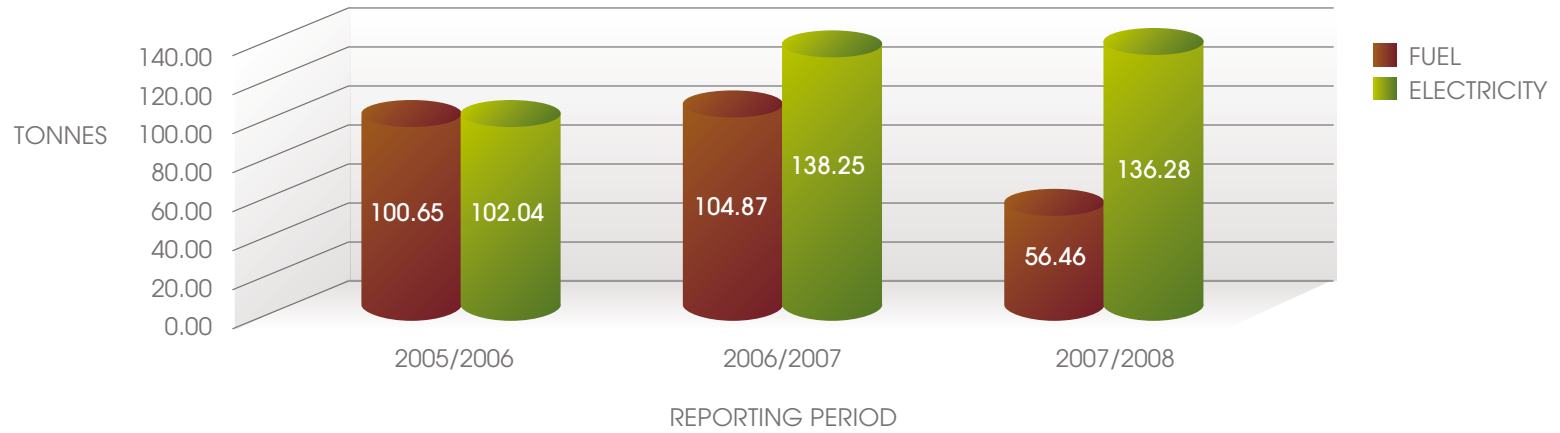
### ELECTRICITY CONSUMPTION (KwH)



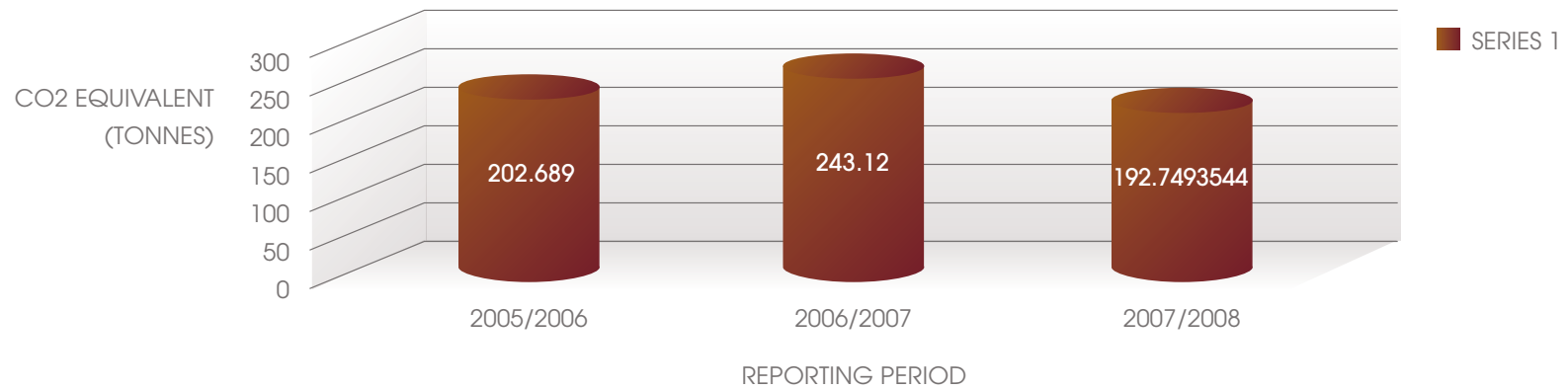
### ELECTRICITY CONSUMPTION - CO2 EMISSIONS



### CO2 EMISSIONS (TONNES)



### TOTAL CO2 EMISSIONS

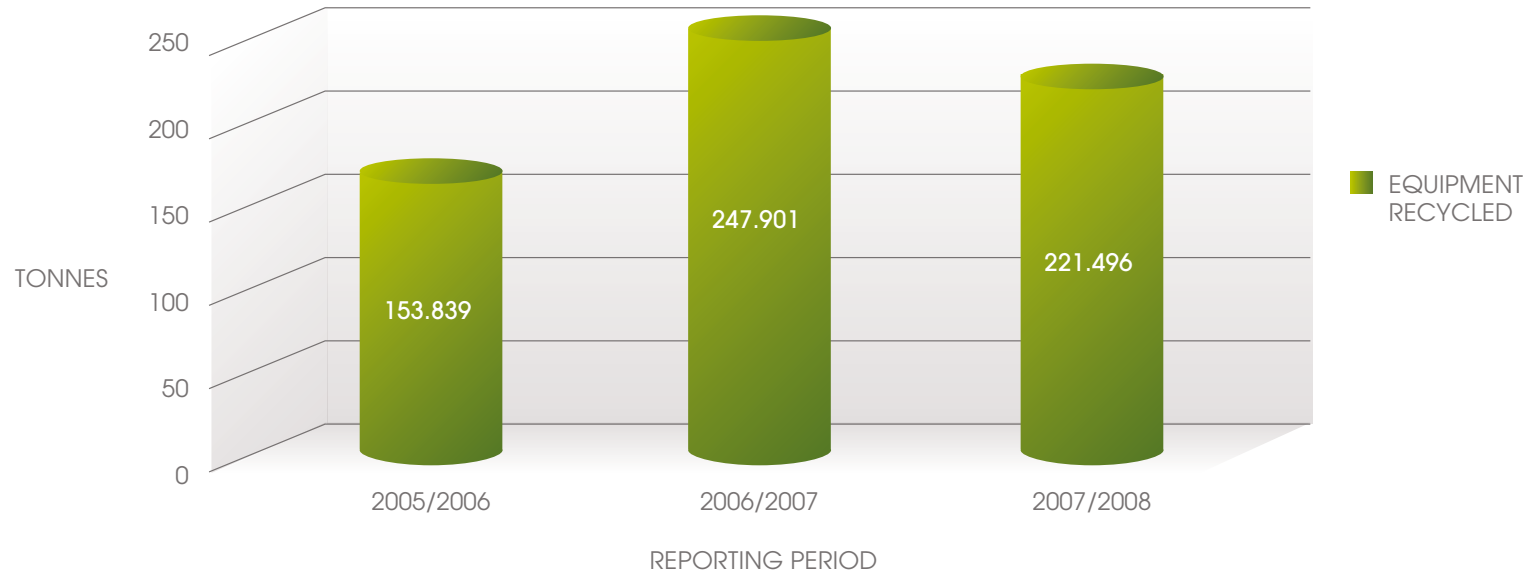


# Environmental Balance Sheet

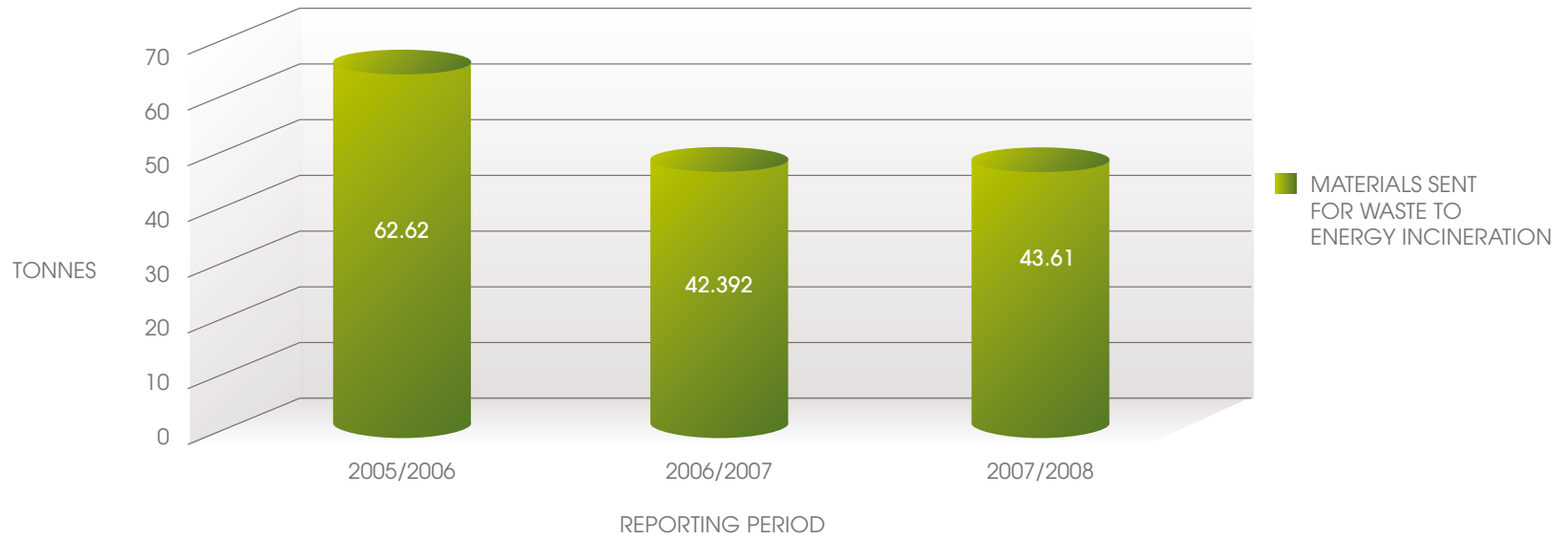
EMAS Data - Period 1st July 2007 to 30th June 2008

	Tonnes
<b>Equipment Re-Used</b>	
Total units	357.349
<b>Equipment Recycled</b>	
(Accessories)	100.39
(Mobile phones)	52.96
(CD's)	1.481
(Batteries)	47.345
(LCD's)	2.6
(Dummy phones)	16.72
Totals	221.496
<b>Materials Recycled containing hazardous substances</b>	
Totals	0
<b>Materials sent for waste to Energy incineration</b> (General Waste)	43.61
<b>Materials landfilled (Non hazardous)</b>	
Totals	0
<b>Materials specialised landfill</b> (Containing hazardous substances)	
Totals	0
<b>Materials sent for high temperature incineration</b> (SIM's for secure destruction)	7.14
<b>Packaging for re-use or recycle</b>	
(Plastics / PVC Trays)	15.31
(Paper/Cardboard)	72.74
Totals	88.05
<b>Total Equipment and Materials processed</b>	717.645

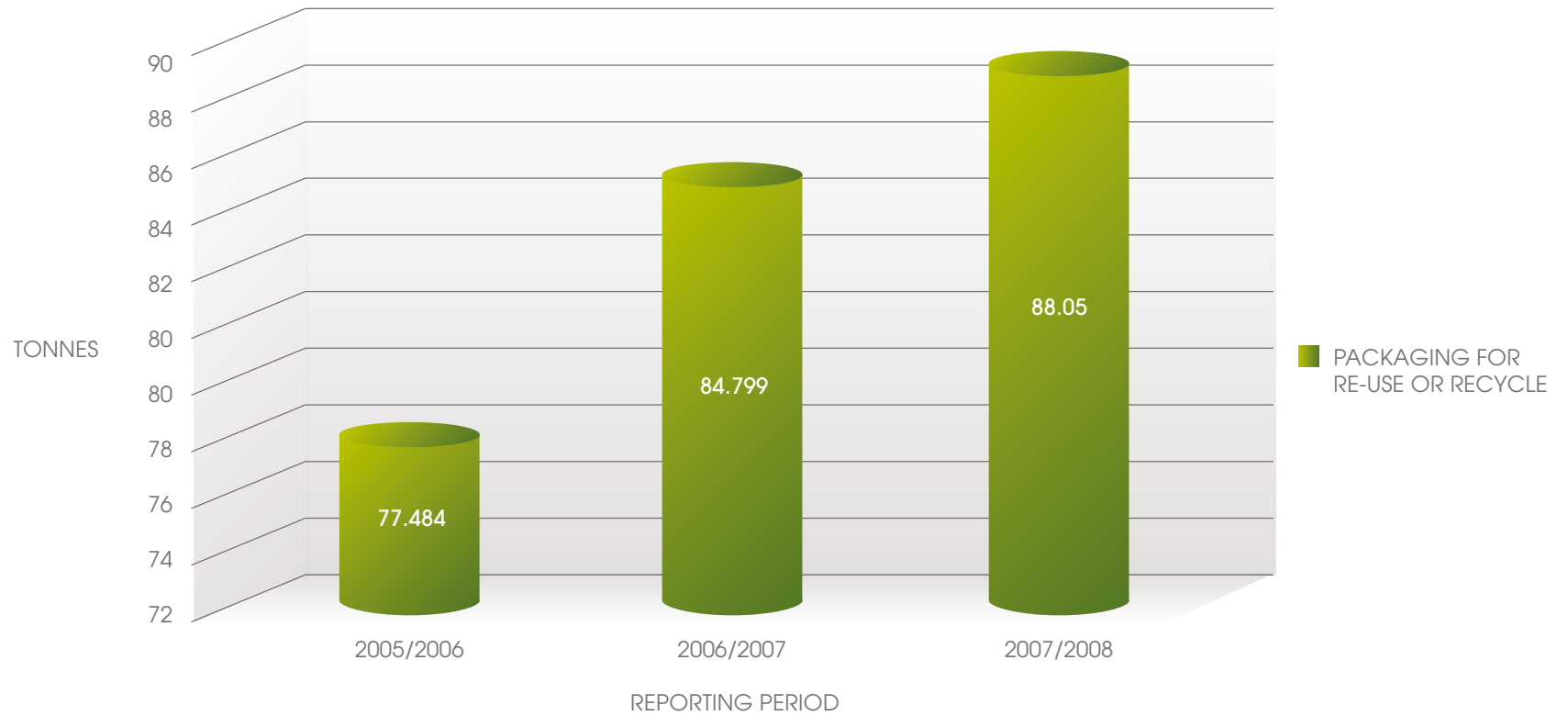
## EQUIPMENT RECYCLED



## MATERIALS SENT FOR WASTE TO ENERGY INCINERATION



## PACKAGING RECYCLED



## Objectives/Targets achieved 2007/08

Objectives	Targets Achieved
Increase coverage on a global level for reuse of mobile phones in line with Regeneris business strategy	<ol style="list-style-type: none"> <li>1. The business has focused on the UK market during 2007/2008.</li> <li>2. Plans for business development in 2008/2009 are in place with investment in resources (See Objectives / Target 2008/2009)</li> </ol>
Implement the completed and agreed Integrated Management System (IMS)	<ol style="list-style-type: none"> <li>1. IMS has been fully completed and now being used across the Eurocourt site.</li> </ol>
Develop and maintain a planned internal audit programme for the IMS	<ol style="list-style-type: none"> <li>1. All processes, forms, registers, ETC, was audited as a whole as the integration was carried out. Full audit schedule has been produced and audits planned for Sept 08</li> </ol>
Re-assess / Audit key strategic suppliers, including Boliden, SNAM and London Waste	<ol style="list-style-type: none"> <li>1. Boliden was audited in February 2008, along with Umicore Battery recycling plant, both in Sweden. London waste was audited in March 2008. Due to meet with SNAM later in the year. All other recyclers and suppliers will be assessed and/or audited throughout 2008.</li> </ol>
Continue to review international legislation including WEEE and implement processes to ensure compliance	<ol style="list-style-type: none"> <li>1. WEEE Directive has been in full operation since July 1st 2007, and Regeneris have continued to hold all four key roles. Legislation is continually monitored to ensure compliance, as well as plans to make improvements to our internal process' for recording WEEE data on a quarterly basis.</li> <li>2. Legal register is reviewed on a six monthly basis. WEEE regulations now in force, Regeneris are registered as Producer Compliance Scheme, Approved Authorised treatment Facility, Approved Authorised Exporter and a Designated Collection Facility for the 2008 compliance period.</li> </ol>

## Objectives/Targets achieved 2007/08

Objectives	Targets Achieved
Record quarterly returns of WEEE for AATF and Scheme returns	<ol style="list-style-type: none"> <li>All WEEE processed in 2007/2008 has been calculated, recorded and reported to the Environment Agency, with significant success against our obligated total for the 2007 compliance period. Declaration of Compliance has been sent to the Environment Agency, along with the required Producer Responsibility Independent report</li> </ol>
Continue discussions with BERR and government sectors to help with guidance and feedback for WEEE regulations	<ol style="list-style-type: none"> <li>Environment Agency and Producer Compliance meetings have been attended</li> <li>Continued guidance is released by the Environment Agency and BERR to assist Schemes with updates</li> </ol>
Report on an annual basis our Environmental performance. Achieve a 5% improvement in CO2 performance in terms of consumption of resources' in relation to tonnage of material processed	<ol style="list-style-type: none"> <li>All quarterly returns are completed for the Environment Agency. All Energy consumption and waste removed from site is monitored constantly</li> <li>Period 2006/2007: Material Processed = 828.378 tonnes. Period 2007/2008: Material Processed = 717.645 tonnes.</li> <li>Therefore, production decrease of 13.37%</li> </ol> <p>Period 2007/2008: CO2 total = 192.75 tonnes. Period 2007/2008: CO2 total = 168.62 tonnes. Therefore, CO2 decrease of 27.29%</p> <p>The main reason for the fall in Co2 emissions is mainly down to Unit 2 of the Eurocourt site using a 100% renewable energy supplier. This would have resulted in an even further reduction with our electricity Co2 emissions during the 2007/2008 period, but as of June 2007, the reviewed emissions factor is now 0.523kg.</p>
Find Suitable recycler for Mobile Phone LCD's only	<ol style="list-style-type: none"> <li>Overall, we generate very little LCD's as a separate component. These are normally broken flip style phones, and contain a lot of components so that we can incorporate within our mobile phone recycling.</li> <li>This target was aimed at an older style of LCD that we had accumulated, predominately plastic based so not viable to send with our old phones. In the end, we found a recycler who could take all 6 tonnes of our hands for a commercial return.</li> <li>The LCD's themselves have been sent to Umicore for processing.</li> </ol>

## Objectives/Targets achieved 2007/08

Objectives	Targets Achieved
Review the need for a compactor to manage paper / cardboard waste	<ol style="list-style-type: none"> <li>1. Cardboard / Paper loads are removed off site for a very minimal fee. The cost of obtaining the compactor, and the labour used to run and monitor it is not viable on a cost basis. Therefore, we have decided to continue with the current process.</li> <li>2. We currently have a skip in yard, cardboard / paper is tipped directly into skip and manually compacted. Compactor would not make to much difference as we manually do this anyway</li> <li>3. Cost per lift £34 with average 3 lifts per month. Cost of compactor on site £170 a month, plus labour costs.</li> </ol>
Investigate the possibility of achieving ACCA reporting award	<ol style="list-style-type: none"> <li>1. Entry date for award in 2008 was missed so this objective will be carried over for 2008/2009</li> </ol>
Investigate possible web-based data and information for Clients	<ol style="list-style-type: none"> <li>1. Website has been produced and is currently under construction. Once complete, it will provide our clients with a web page that can display all client reporting at the touch of a button</li> </ol>

## Objectives/Targets 2008/09

### Objectives

- Increase coverage on a global and national level for reuse of mobile phones in line with Regeneris business strategy
- Where possible implement a local country screening facility, to ensure minimal movement of recycling product, starting France in 2008
- Work with Industry bodies to ensure that Reuse continues to be a favoured option for end of life product
- Investigate other products to collect & process on site in line with Regeneris business strategy & Producer Compliance Scheme
- Continue to record quarterly returns of WEEE for AATF and Scheme returns throughout 2008/2009, and re-establish registration with our members for the 2009 Compliance period
- Continue to obtain approvals for all four key roles within the WEEE directive (PCS, AATF, AAE and DCF) for the 2009 compliance period
- Report on an annual basis our Environmental performance. Achieve an improvement in CO2 performance in terms of consumption of resources' in relation to tonnage of material processed
- Investigate the possibility of switching to a 100% renewable energy provider for Unit 7 of the Eurocourt sites
- Continue to achieve ISO accreditation for the Integrated Management System
- Investigate the possibility of achieving ACCA reporting award
- Investigate the possibility of becoming Carbon Neutral

## Closing Statement

2007-2008 has been year of change for the Company, especially with the full introduction of the WEEE regulations, and the company re-brand.

Results have been very good for our Producer Compliance Scheme, where we overachieved against our obligated tonnage in the 2007 Compliance period. With initial good results in 2008, we are confident of repeating this success for the rest of the 2008 compliance period, and with our members, we will continue to collect and recover as much WEEE as possible.

We have successfully merged our Quality and Environmental management systems, into one integrated system, and this has been made available to all relevant staff via shared drives. This is an electronic, user friendly system, using hyperlinks from one main page, linking to all relevant documents, providing everyone with required documentation, information or certification where required. This system will be audited for our ISO 9001:2000 and ISO 14001:2004 accreditations towards the end of 2008.

Generally, recycling levels have been very consistent, with very similar tonnage totals to the previous reporting period. Paper/ Cardboard and plastic recycling has remained at approximately 85 tonnes, and with general waste to incineration tonnage at 43 tonnes, we have continued at the reduced recycling rate from 2006/2007. We will continue to monitor our reuse and recycling rates throughout the year.

As predicted within our last statement, CO<sub>2</sub> emissions for the West Thurrock sites have dropped dramatically in tonnage compared with 2006-2007 period. There was a huge reduction, exceeding our objective of our 5% improvement. This is mainly due to Unit 2 of the Eurocourt site using a 100% renewable energy supplier, and a reduction in pool cars and delivery fleet. This is also taking into consideration that during 2006/2007, the Defra emissions factor stated, "A kWh of Electricity is equivalent to approximately 0.43kg". This would have resulted in an even further reduction with our electricity Co<sub>2</sub> emissions during the 2007/2008 period, but as of June 2007, the reviewed emissions factor is now 0.523kg.

Audits were carried out with key suppliers in April 2008, and we are continuing to work with our recycling partners to achieve the best possible disposal solutions. Plans to investigate other environmental improvements will continue throughout 2008/2009.

Steve Smith  
Quality & Environmental Manager