

Emissions and Discharges Plan 2026-2029

1. Introduction

Emissions and Discharges generally refers to the liquid effluent, solid waste and airborne matter that is a by-product of a business's activity.

The University's Energy and Environmental Policy commits to *"Reduce the risk and minimise the impact from campus activities by controlling emissions, meeting regulatory standards and implementing emergency response procedures to prevent pollution"*.

Emissions and discharges include:

- Foul water effluents, sewage and grey water releases to the foul water system.
- Surface water discharges, rainwater run off from buildings and surfaces
- Emissions to air including gaseous and particulate releases from stacks, the CHP, fumes cupboards,
- Vehicle emissions – commuter vehicles, deliveries, public transport - particulate matter, NOX, SOX and other greenhouse gas emissions.
- Accidental releases (spills and leaks of hazardous substances e.g. oil, chemicals, gases)

Current control measures to reduce the impact of potentially polluting discharges and emissions include:

Table 1:

Emissions/Discharges	Responsible Party	Current Control Measure
Sewage and grey water – trade water effluent	Thames Water Estates	Water Management Plan. Reduction of wastewater by managing consumption. Maintenance and servicing by Estates contractors
Rainwater runoff from buildings and surfaces to surface water drainage system.	Infrastructure managed by Estates	Regular maintenance and servicing of drainage infrastructure – interceptors and grease traps.
Stack emissions – from boilers, generators and fume cupboards (LEVs).	Estates and Schools	Compliant design and specifications. Testing and Servicing in line with Environmental Permit conditions. Appropriate use of fume cupboards using H&S CoP46: Local Exhaust Ventilation Systems
Vehicle emissions – commuter vehicles, deliveries, public transport.	Vehicle owner responsibility. Procurement Vehicle manager	Sustainable Travel Plan Travel Policy & Principles Procurement Policy - Reduce deliveries via contracts/agreements via procurement process Net Zero Carbon plan Fleet vehicle management – low emissions contract terms.
Refrigeration gases – accidental release	Estates and contractor	Compliance testing & servicing managed by Estates
Accidental releases (spills and leaks of hazardous substances e.g oil, chemicals, gases)	Estates and School and third parties	Spills Plans Spill Kits Inspections of fuel tanks, stores and interceptors.
A list of incidents related to the accidental release of hazardous substances is stored in the EEMS		

Setting a target for emissions and discharges from accidental or unforeseen releases of substances hazardous to the environment is hard to achieve. Efforts to reduce the risk of emissions and discharges needs to be preventative, but also there is work that can be done on making sure that when an incident occurs, we are well prepared and can respond to an incident effectively to reduce the severity of the incident.

Only half of all incidents between 2017-2026 can be attributed to University activities. Other incidents can be attributed to contractors, suppliers and staff vehicles. From 2017/18 – 2025/26 between 1 and 3 incidents per year have directly emanated from University activities.

2. Plan

Aim: To reduce the impact of emissions and discharges on the environment. The University aims to control and reduce emissions where possible by maintaining infrastructure to meet regulatory standards and to prevent pollution from incidents originating from university activities and those of its tenants by implementing plans to eliminate or reduce emissions.

Objective: The University will limit the number of incidents and non-conformities raised regarding emissions and discharges from university activities. The University will respond quickly and appropriately to reduce the impact of unforeseeable instances and work to ensure incidents are prevented in the first place.

KPI: Number of reported pollution incidents per year compared to target.

Target: No more than 3 incidents from University activities on a rolling 3 year average. The response to incidents will be prompt and efficient to reduce the impact on the environment which will in turn save on clean up costs.

Actions and controls:

1. All schools to have Spill Plans in place where an environmental risk from an incident has been identified, and this should be trained out to relevant staff. See H&S CoP 55 on Spill Management.
2. Issue Pollution Prevention Guidance document. Sustainability Services.
3. All relevant staff from Estates to watch spills training video annually, response teams to attend Level 1 training in person and those designated as leads have Level 2 training every 3 years. Toolbox talks will be provided where necessary.
4. Continue to implement Zero Carbon Plan, Water Management Plan, Travel Plans and Waste Strategy as per the targets set out in the respective documents.
5. Continue with the programme to inspect and maintain interceptors. Installing control measures where risk of a spill incident is significant and resources allow.
6. Regular inspections of oil tanks via PPM with full inspection every 5 years in line with statutory and regulatory compliance.
7. Continue to service and maintain boilers, refrigeration units, AC-units etc in line with statutory and regulatory compliance.
8. Ensure University vehicles have spill kits on board where necessary in line with the Estates Spill Plan.
9. Contact those suppliers and contractors that transport or use hazardous substances to ensure they have the right procedures and spill kits in place.
10. Continue to monitor incidents and identify proactive improvements via the Incident reporting system and monitor progress with this plan via the annual internal environmental auditing programme and Annual Management Review.

11. Sign up as a Clean Air Day (CAD) supporter and commit to actions that will mitigate our contribution to air pollution. CAD is the largest air quality campaign in the UK, run by Global Action Plan (GAP). <https://www.actionforcleanair.org.uk/campaigns/clean-air-day>

Review: Progress with this plan will be monitored by the Sustainability Team, reviewed annually through the EEMS Management Review process, internal audit programme and more widely in the Annual Sustainability Report. A full review will take place at the end of the 3 year review cycle.

VERSION	DATE ISSUED	AUTHOR	MONITORING & REPORTING	REVIEW FREQUENCY	NEXT REVIEW DATE
V1.0	July 2022	Anna Glue			July 2023
V2.0	July 2023	Anna Glue	Annually to EMRG	Every 3 years	July 2026
V3.0	July 2026	Anna Glue – Head of Sustainability	Management Review – ELT/Estates	Every 3 years	July 2029