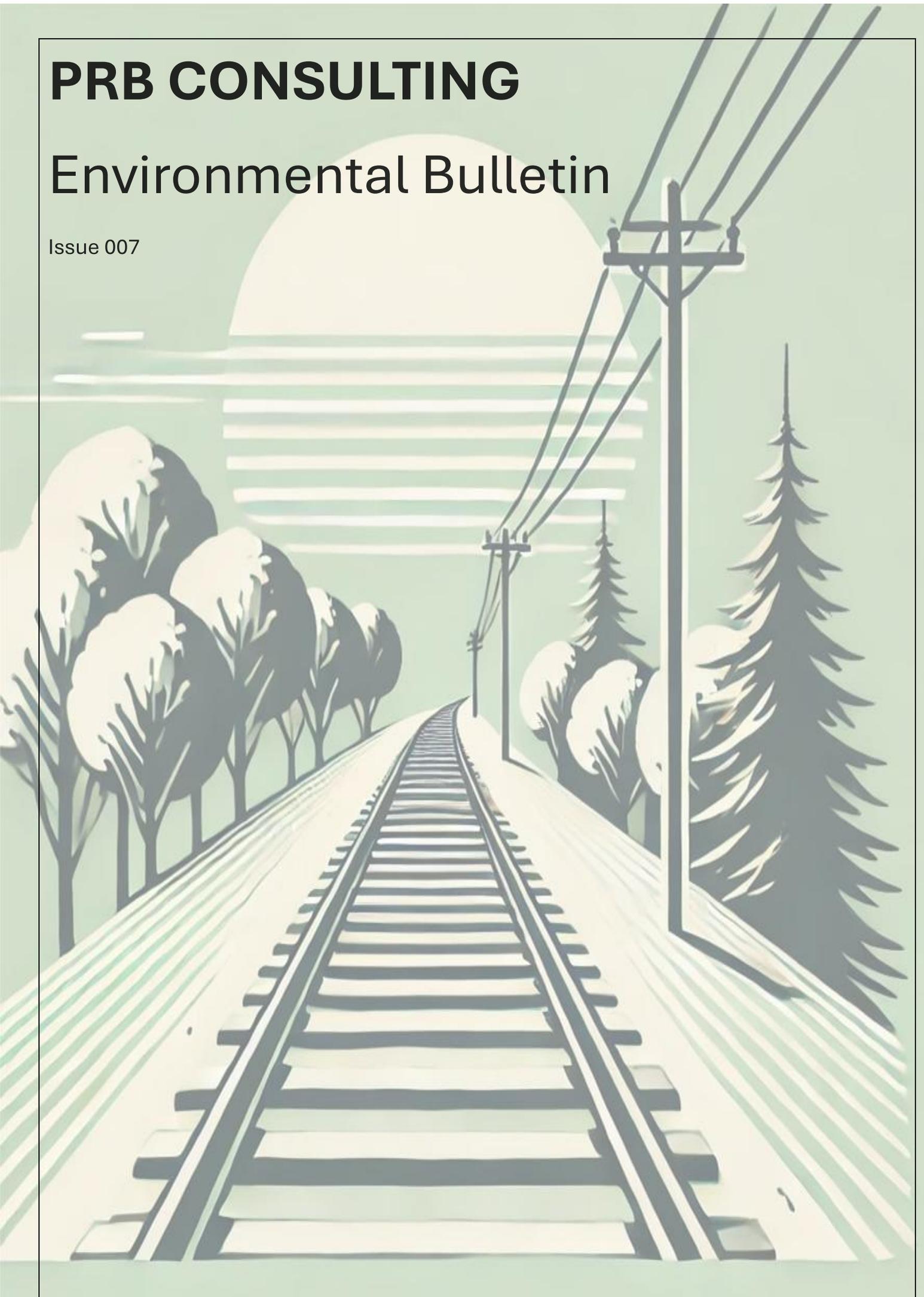


PRB CONSULTING

Environmental Bulletin

Issue 007



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RISQS Sustainable Railways Questions – A Proportionate and Practical Approach

RISQS has recently introduced a new set of questions within the Sustainable Railways section of the supplier portal. While these questions may appear extensive at first glance, it is important to understand that many of them are **not mandatory legal requirements** for all rail suppliers.

The questions are designed to establish maturity, proportionality and transparency — not to penalise organisations that do not yet have formal strategies in place. In many cases, suppliers are simply being asked to confirm whether arrangements exist, or to explain *why they are not currently applicable* to their business.

A key point is that answering “No” does **not automatically generate an audit**. Audits are only triggered where suppliers confirm that formal systems, plans or targets exist and request assurance against them. For many small and medium-sized organisations, a clear, honest and proportionate explanation is entirely acceptable.

The most effective approach is to:

- Understand which areas are **legal duties** and which are **voluntary or client-driven**
- Avoid overstating maturity or committing to systems you do not yet operate
- Ensure responses are consistent with your existing management systems and risk profile

PRB Consulting has undertaken a detailed review of the RISQS Sustainable Railways questions and their implications. If you would like support in reviewing your responses, avoiding unnecessary audits, or developing proportionate environmental arrangements where genuinely required, please contact PRB Consulting for tailored advice and guidance.

Top Five Mistakes to Avoid When Completing the RISQS Sustainable Railways Questions

1. Claiming to Have Formal Systems You Don't Actually Operate

Answering "Yes" to policies, plans or strategies that are informal, incomplete, or not embedded can unintentionally trigger an out-of-turn audit.

2. Assuming Every Question Reflects a Legal Requirement

Many sustainability topics (such as biodiversity strategies, science-based targets, or social value plans) are **voluntary or client-driven**, not statutory.

3. Providing Over-Engineered or Generic Responses

Uploading large, generic or copied documents that are not proportionate to your business size or activities often raises further questions. Responses should be tailored, relevant, and aligned with your actual risk profile.

4. Inconsistency with Existing Management Systems

Responses that conflict with your ISO management systems, risk assessments, or previous RISQS submissions can undermine credibility. Ensure answers are consistent across environmental, safety and business documentation.

5. Requesting Audits Without a Clear Business Need

Opting into sustainability audits without a contractual, legal or commercial driver can add cost without tangible benefit. Audits should be a conscious strategic decision, not a default response.

ENV24-03 Polychlorinated Biphenyls

Overview

PCBs are Persistent Organic Pollutants (POPs), manmade organic compounds that were frequently used as dielectric insulation and coolant fluids in electrical equipment and which pose serious risks to humans and the environment due to their toxic properties.

There have been a number of incidents where PCB contaminated equipment has not been managed in accordance with the processes in NR/L2/ENV/120 and NR/L2/ENV/123.

The 'Responsible Manager' for managing assets within business units must be identified and documented by the head of each business unit (e.g., Infrastructure Director, Capital Delivery Director, Infrastructure Maintenance Delivery Managers or equivalent).

It is the duty of the 'Responsible Manager' to check and confirm that all equipment and transformers contaminated with PCBs are included in local registers and, as required, the central Network Rail PCB register through emailing PCBdocuments@networkrail.co.uk.



Labelling PCBs

Any PCB contaminated equipment/fluid (oil) must be labelled in accordance with NR/L2/ENV/123 and a sign shall also be attached to the premises where the equipment is used, stating that the premises contains equipment contaminated with PCBs. These labels shall be maintained to state:

- A) The presence of PCBs.
- B) Their listing on the central register;
- C) The date of identification; and
- D) The date of the last inspection

Disposing of PCBs

PCB contaminated equipment/fluids (oils), as well as any protective clothing that has been contaminated with PCBs, shall be disposed of as hazardous/special waste in accordance with NR/L2/ENV/120. Responsible managers must confirm that:



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- Risk assessments are in place for activities involving PCB substances
- Only trained personnel inspect and handle PCB contaminated assets/substances.
- All waste produced is identified using the European Waste Catalogue (EWC) or List of Wastes (LOW) in compliance with the Duty of Care for Waste.
- Any movement of PCBs has a hazardous waste consignment note that accompanies it (Special Waste Consignment Note for Scotland).
- All compliant waste documents and records are maintained so that they can be provided to the relevant regulator when requested.

Note 1: European Waste Catalogue and Codes can be found online and must be used when transferring wastes.

Note 2: If there is any uncertainty about the disposal of PCB's, contact your local environment and sustainability team.

Discussion Points

Discuss with your teams and check that responsible managers for managing PCBs are known.

- Who within your teams is responsible so your records of PCBs are maintained effectively?
- Do you know how PCBs should be handled and disposed of safely? If not, ensure that you have read and understood clause 11 of NR/L2/ENV/123 Prevention of Pollution to Land and Water

Want to find out more?

<https://www.gov.uk/guidance/polychlorinated-biphenyls-pcb-registration-disposal-labelling>

If you have any queries, please contact the [Environment and Sustainability team](#).



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ENV25-01 Simpler Recycling Regulations: England Only

What is Simpler Recycling? The Separation of Waste (England) Regulations 2024

The Separation of Waste (England) Regulations

2024 aims to streamline waste management processes and make recycling more efficient by requiring the separation of waste where it is generated (i.e. in offices, depots, signal boxes and stations).



From **31 March 2025**, all workplaces (businesses and non-domestic premises) in **England** have a legal duty to present the following waste for separate collection:

Dry Recyclable Materials – plastic bottles, metal, glass, paper, and cardboard.

Food Waste – food leftovers, waste generated by preparing food (of any volume, including if the workplace does not serve food or have a canteen)

Residual Waste – tissues, kitchen roll, highly contaminated materials like food packaging that cannot be recycled (crisps and confectionary wrappers).

Some locations may be required to separate **Paper and Card, and Glass** from other dry recyclables, unless the waste collector chooses to collect them together.

Should a company fail to segregate waste properly, they may experience missed collections, incur wasted journey fees, excess weight charges or contamination charges.

Discussion Points

- What kind of food waste do you produce during your working day?
- What kind of dry recyclable materials do you produce during your working day?
- How are you going to make sure that these are going to be properly separated at your place of work?

For further information on Simpler Recycling (England) Regulations, please click [here](#)

For further information on The Workplace Recycling (Wales) Regulations, please click [here](#)

For further information on The Waste (Scotland) Regulations, please click [here](#)



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Driving Safe in Cold Weather

Driving in cold weather presents unique hazards like black ice, reduced traction, and limited visibility. The below outlines essential steps to ensure your safety on the road.



1. Pre-Journey Preparation

- **Check the Vehicle:** Ensure your lights, wipers, and washers are functional. Verify that your tyres have a minimum tread depth of 1.6mm (ideally 3mm for winter) and are correctly inflated.
- **Clean All Glass:** Do not start driving until your windscreen is fully clear. Remove snow from the roof, hood, and lights to prevent it from sliding onto your windshield or blinding other drivers.
- **Monitor Weather:** Check the [Met Office](#) for severe weather warnings before departing. If conditions are extreme, consider if the journey is truly necessary.

2. Defensive Driving Techniques

- **Slow Down:** Reducing speed is the single most important factor for maintaining control. Speed limits are for ideal conditions, not icy ones.
- **Increase Following Distance:** Stopping distances can increase by up to **10 times** on ice. Maintain a gap of at least 8 to 10 seconds behind the vehicle in front.
- **Smooth Movements:** Avoid harsh braking, sudden acceleration, or jerky steering. Pull away in **second gear** to reduce wheel spin.
- **Disable Cruise Control:** Never use cruise control on wet or icy roads, as it can cause the vehicle to accelerate if it loses traction.

3. Identifying Hidden Hazards

- **Black Ice:** Watch for "glossy" or dark-looking patches on the road, especially in shaded areas, under trees, or on bridges.
- **Bridges and Overpasses:** These freeze faster than normal roads because they are exposed to cold air from both above and below.
- **Low Sun:** Carry **sunglasses** to combat the glare from the low winter sun, which can be intensified by snow and ice.



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4. Winter Emergency Kit

Keep these essential items in your vehicle at all times:

- **Visibility:** High-visibility vest, warning triangle, and a working torch with spare batteries.
- **Tools:** Ice scraper, de-icer, and a small shovel.
- **Survival:** Warm blankets, extra clothing (hat, gloves, boots), water, and non-perishable snacks.
- **Communication:** A fully charged mobile phone and an in-car charger.

5. What to do if Stuck

- **Stay Calm:** Avoid spinning your tyres, as this will bury the vehicle deeper.
- **Stay with the Vehicle:** Unless help is clearly visible and close, stay in your car to avoid getting lost or suffering from hypothermia.
- **Exhaust Pipe Safety:** If running the engine for heat, ensure the exhaust pipe is clear of snow to prevent **carbon monoxide poisoning**.

Discussion Point: What is the most dangerous road on your regular route during a frost, and how will you adapt your driving there tomorrow?



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Winter Weather Warnings Raise Safety Concerns for UK Tradespeople

Prolonged cold conditions at the start of the year are increasing safety and wellbeing risks for tradespeople working outdoors, as parts of the UK experience snow, ice and sub-zero temperatures.



Early January has already seen multiple weather warnings issued by the Met Office, creating hazardous working conditions across construction sites and other outdoor workplaces. While there is no legal minimum temperature for outdoor work in the UK, employers remain responsible for managing risk and protecting workers from harm.

Cold exposure, reduced daylight and slippery surfaces combine to raise the likelihood of injury during winter months, particularly for workers whose roles require physical labour or prolonged time outdoors.

Cold Stress and Injury Risks Increase in Winter

Cold weather could place significant strain on the body if not properly managed.

If your body gets to the point where it cannot stay warm, it will become vulnerable to illness and injuries, some of which can be life-threatening if ignored.

Employers and workers should consider whether tasks are essential during periods of severe cold or whether work could be postponed until conditions improve.

Winter conditions also raise the risk of slips, trips and falls on site. Research suggests that around a quarter of non-fatal construction injuries during winter months are linked to falls caused by icy or wet surfaces.

Snow and ice could make stairs, ladders, scaffolding and walkways particularly dangerous if not properly maintained. She said gritting surfaces before overnight freezes and conducting full site checks before work begins are key steps in reducing risk.

Sites should then be checked first thing the next morning before any trade work begins. Doing so will allow you to clear snow and ice from high-traffic areas, as well as clearly mark out any particularly dangerous areas where slips and falls are more likely so that they can be avoided.



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Clothing and Equipment Play Critical Role

Cold weather work also places greater importance on suitable clothing and protective equipment. Poor insulation, wet clothing and inadequate footwear can increase the risk of cold-related illness and injury, as well as reducing concentration and physical performance.

Workers should ensure they have access to appropriate winter workwear and avoid finishing the day in wet or cold clothing. On top of these items, also always carry an entire change of clothing and footwear in your work vehicle.

Employers are expected to assess whether existing personal protective equipment remains suitable for winter conditions and make adjustments where needed.

Mental Health, Morale Pressures in January

Alongside physical risk, winter working conditions can take a toll on morale and [mental wellbeing](#). Shorter days, cold weather and post-holiday financial pressures can contribute to [stress](#) and fatigue, particularly for self-employed tradespeople.

Flexibility in scheduling could help ease pressure during winter months. Factoring in extra time for weather disruption and reduced daylight can lower stress and improve safety outcomes.

Workers are encourage to use quieter periods to focus on training or upskilling, rather than viewing delays solely as lost productivity.

Health Habits and Financial Strain

Winter could be an opportunity for workers to refocus on health habits that support wellbeing throughout the year. Sleep, reduced alcohol intake and maintaining vitamin D levels as factors that can influence energy and resilience during physically demanding work.

January can also bring financial pressure for tradespeople running their own businesses. Chasing overdue invoices, claiming eligible tax reliefs and reviewing budgets could help ease stress during a traditionally difficult month.

With cold weather likely to persist, a combination of better planning, improved site safety checks and attention to personal health can help workers manage both physical and mental demands through winter.



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Battery Trains Signal a Practical Step Towards Rail Decarbonisation

The introduction of battery-powered passenger trains into live service marks an important milestone in the UK rail industry's decarbonisation journey. Recent trials have demonstrated that modern battery trains are capable of operating for significant distances on non-electrified routes, with rapid charging achieved at stations or depots already connected to the electrified network.

For the rail sector, this technology offers a pragmatic alternative to diesel traction where full electrification may be complex, disruptive, or financially prohibitive. Battery operation can significantly reduce tailpipe emissions, noise, and vibration, while also lowering maintenance requirements when compared with traditional diesel units.



From an environmental and operational perspective, battery trains align well with the wider sustainability ambitions being pursued by organisations such as Network Rail and the broader supply chain. They also support incremental carbon reduction, allowing operators to decarbonise routes progressively rather than waiting for large-scale infrastructure upgrades.

While battery technology is not a universal solution, its deployment demonstrates how targeted innovation can deliver tangible environmental benefits now, rather than at some distant point in the future. As trials expand and performance data matures, battery trains are likely to become an increasingly common feature of the UK rail landscape.



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