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NORWOOD UK

Arrangements for
Waste Disposal

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All waste generated during the course of Norwood UK activities shall be deemed “controlled waste” and disposed of in a responsible manner in accordance with our duty of care under the Environmental Protection Act.

The divisional directors shall ensure that all waste materials are stored and disposed of in accordance with company procedures and relevant legislation.

Waste Management Duty of Care

The duty of care applies to “controlled waste”. Waste is defined as “any substance or object which the producer or the person in possession of it discards or intends or is required to discard”. Additionally, the duty of care applies to anyone who is the holder or carrier of such waste. The only exception to this is for occupiers of domestic property for the household waste generated from their home.

“Controlled waste” means waste from households, commerce or industry. A further subdivision can be made into “hazardous” and “non-hazardous” wastes depending on the effect of these wastes on health and the environment.

“Holder” means anyone who imports, produces, carries, keeps, treats or disposes of controlled waste or, as a broker, has control of it.

The Environmental Protection (Duty of Care) Regulations, the Controlled Waste Regulations and the Hazardous Waste Regulations place legal responsibilities on waste producers and holders to ensure that the disposal of all controlled waste is safely managed and that records are kept for audit by the relevant authorities.

AUTHORITIES AND ADVISORY BODIES

The following authorities and advisory bodies should be consulted where appropriate:

- The Environment Agency (EA).
- The Scottish Environment Protection Agency (SEPA).
- The Health and Safety Executive (HSE).
- The Local Authority Environmental Health Department.
- The Local Authority Waste Disposal Department.
- Department of the Environment, 43 Marsham Street, London SW1 3PY

DISPOSAL CONTROLS

All waste processes must be regularly monitored. This should include weekly (or daily) checks on all waste collection areas, checks on the correct segregation of waste and checks on the contractors who remove the waste.

Appropriate documentation must be completed to provide an auditable trail for the waste.

Carriers must be registered in order to collect waste, and the disposal and recovery facilities must be licensed to take the waste.

It must be remembered that the duty of care for waste continues all the way down the line to the point of final disposal. Thus, if an incompetent contractor allows waste to escape after collection then the responsibility may rest with the producer of the waste. It is therefore crucial that organisations select competent contractors to deal with their waste.

In summary, the following actions must be carried out:

- Appoint a competent waste carrier, ensuring that they are registered and hold an appropriate license.
- Ensure that appropriate documentation is completed and accompanies waste
- Waste transfer notes for non-hazardous waste
- Ensure documents are securely filed (waste transfer notes must be kept for a minimum of 2 years and hazardous waste consignment notes for a minimum of 3 years).
- Ensure that the final disposal site is registered and has a license to accept specific types of waste.

DISPOSAL PROCESS

Local arrangements have been made with the landlords of all PTSG divisional office locations for the supply of suitable disposal receptacles which include recyclable and non recyclable waste. The waste is collected weekly and transferred by the local councils.

When on site, arrangements for the disposal of packaging materials and waste are normally made with the site providers to utilise their facilities e.g. waste skips. Permission to use their facilities must be established before disposal and care must be taken when transferring waste to ensure that you do not come into contact with hazardous materials, i.e. broken glass, sharp metals etc, do not overload waste receptacles or 'push down' materials to make more room. Ensure the waste is transferred into the correct receptacle i.e. recyclable/non-recyclable.

If this is not possible the waste is removed from site and transferred to satellite locations units for disposal.

Condemned equipment's, e.g. 'eye bolts' which have failed a thorough examination remain the property of the site provider/duty holder, they should make arrangements for the equipments to be disposed of responsibly. Lightning protection down tape will be transferred to the lightning protection storage areas for recycling and final disposal, where practicable earthing tape will be recycled into insulation earth mats.

Millennium Hygiene Services remove the feminine products from the premises Arrangements have been made with CERTEX, the supplier of wire ropes for the company to utilise their disposal of waste facilities.

Inkjet, fax and photocopier cartridges are transferred by various waste brokers including The British Red Cross Recycle4charity and supplier pre-paid envelopes procedures.

Signed for and on behalf of the company

A handwritten signature in blue ink, appearing to read 'Jo Shuttlewood', written over a faint, illegible background.

Jo Shuttlewood – HR Director