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## Waste Management VolkerFitzpatrick VolkerFitzpatrick-Rail VW Specialist Businesses VolkerRail VolkerStevin VolkerHighways VolkerLaser VolkerServices

1. PURPOSE

This procedure gives guidance on the requirements for the management of wastes to ensure the correct and legal disposal of wastes in accordance with Duty of Care (DoC) and other applicable legislation and requirements, including their storage, segregation, disposal, use and treatment, completion of Site Waste Management Plans, measurement and reporting of waste information.

#### 2. SCOPE

This procedure is mandatory and applies to all VolkerWessels UK business units (collectively referred to as VW UK). This applies to England, Wales and Scotland only; if working outside of these (e.g. Guernsey, Jersey, Northern Ireland), check the local requirements with your business unit Environmental Advisor.

For the purposes of this procedure, the 'Project Manager' is the individual ultimately responsible for the management and delivery of works on site (e.g., Operations Manager, Contract Manager, Site Manager, Site Agent).

For the purposes of this procedure, the 'Waste Coordinator' is the person responsible for the checking of waste compliance on site - this may be a designated individual on the site team or a business unit's environmental advisor.

NOTE: Due to the importance of this procedure and complying with its requirements, please contact your Environmental Advisor if in any doubt.

#### 3. REFERENCES (INPUTS)

- Clean Neighbourhoods and Environment Act 2005
- · Control of Pollution Act 1989
- Controlled Waste Regulations 2012
- Deregulation and Contracting Out Act 1994
- Environmental Permitting (England and Wales) Regulations 2010
- Environmental Protection Act 1990
- Hazardous Waste (England and Wales) Regulations 2005
- Scrap Metal Dealers Act 2013
- Special Waste Regulations 1996
- The Control of Asbestos Regulations 2012
- The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations (Scotland) 1991
- The Controlled Waste Regulations (Scotland) 1992
- The Criteria And Procedures For The Acceptance of Waste at Landfills Direction (Scotland) 2005
- The Environmental Permitting (England and Wales) Regulations 2016
- The Environmental Protection (Duty of Care) (Scotland) Regulations 2014
- The Hazardous Waste Regulations (Wales) 2005
- The Landfill Regulations (Scotland) 2003
- The Special Waste Regulations (Scotland) 1997
- The Waste (England and Wales) Regulations 2011
- The Waste (Scotland) Regulations 2012
- The Waste Batteries (Scotland) Regulations 2009
- The Waste Batteries and Accumulators Regulations 2009
- The Waste Electrical and Electronic Equipment Regulations 2013
- The Waste Enforcement (England and Wales) Regulations 2018
- The Waste Management Licensing (Scotland) Regulations 2011
- The Waste Management Regulations (Scotland) 1996
- Use of Waste (England) Regulations 2005
- Waste (England & Wales) Regulations 2011

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#### 3. REFERENCES (INPUTS) (CONTINUED)

- · Waste Duty of Care: Code of Practice
- · Waste Management Licensing (Scotland) Regulations 2011
- Waste Measure (Wales) 2010
- Site Investigation / other testing records and reports
- The Separation of Waste (England) Regulations 2024
- The Separation of Waste (England) (No.2) Regulations 2024

#### 4. ABBREVIATIONS & DEFINITION OF TERMS

- Non-hazardous Waste Is waste that does not contain hazardous properties, or contain them in sufficient
  concentrations so as to be harmful to human health or the environment e.g. wood, plastic, plasterboard,
  paper, card, sewage
- Hazardous / Special Waste Waste is defined as 'hazardous' (in England, Wales and Northern Ireland)
  or 'special' (in Scotland) if it or the materials or substances it contains, are harmful to human health or the
  environment. Typical examples include:
  - Asbestos
  - Chemicals e.g. waterproofing residues
  - Electrical equipment with potentially harmful components such as cathode ray tubes e.g. computer
     Monitors and televisions
  - Fluorescent light tubes and energy-saving light bulbs
  - Vehicle batteries and other lead-acid batteries
  - Oils (except edible oils) e.g. engine oil
  - Used spill kits / granules
  - Refrigerators containing ozone-depleting substances
  - Solvents e.g. aerosols
- Inert Waste Is waste that does not undergo any physical, chemical or biological transformation and does not dissolve, burn or otherwise physically or chemically react e.g. subsoil, stone, bricks, clay, concrete, sand and is subject to the lower rate of landfill tax
- Waste Producer / Consignor Any person or organisation whose activities produce waste. They are
  responsible for identifying the nature and characteristics of the waste and compliance with duty of care
  legislation
- Waste Carrier Any person who collects, carries or transports waste, including those who include who produce and transport their own waste
- Waste Broker A business that arranges waste transportation and management of waste on behalf of another party
- Consignee The receiver of waste
- VolkerSwitch An internal company app, available to all via MS PowerApps, to advertise surplus
  materials to the wider business or search for available items to minimise wastage
- EA Environment Agency
- CL:AIRE Contaminated Land : Applications in real environments
- SEPA Scottish Environmental Protection Agency
- NRW Natural Resources Wales
- DoC Duty of Care
- WTN Waste Transfer Note
- HWCN Hazardous Waste Consignment Note
- SWCN Special Waste Consignment Note (The equivalent term to 'hazardous waste consignment note' used in Scotland)
- Special Waste The equivalent term to 'hazardous waste' used in Scotland
- WEEE Waste Electrical and Electronic Equipment
- SWMP Site Waste Management Plan

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#### 4. ABBREVIATIONS & DEFINITION OF TERMS (CONTINUED)

- MMP Materials Management Plan
- **Circular Economy -** All products and materials are considered a resource, and when no longer needed, they are reused, recovered, or regenerated to prevent single use.
- CDE Common Data Environment

#### 5. ACTIONS (PROCESS)

#### RESPONSIBILITY

#### 5.1 Definition and Legal Framework

Waste is defined as "any substance or material we discard, intend to discard or are required to discard" (Waste Framework Directive). The term "discard" does not just mean disposal, but also reuse and recycling activities. It can apply to materials brought to site as well as material sent away from site.

A material is likely to be waste if it's left over, unwanted, a burden on the producer or holder, or it can no longer be used for its original purpose.

CECA (Civil Engineering Contractors Association) have produced a useful guidance document to assist with the classification and understanding of waste permits (CECA - Waste Classification and Permitting in Construction).

Reasons why a material may be considered 'waste' include:

- A. It is not needed on the site where it was produced (e.g. surplus soils and other excavated material) - even if there is a use for it elsewhere. It may be used as a non-waste if it is used on the same site or at another site with or without further processing, in accordance with the requirements in the CL:AIRE code of practice
- B. It needs to undergo processing in order to make it suitable for use (e.g. screening / crushing of concrete to produce recycled aggregate); this will be considered waste until it has been produced in accordance with the Quality Protocol 'Aggregates from Inert Waste' (Note: 'processing' does not include "soil improvement techniques" that improve geotechnical properties, such as lime / cement stabilisation, compaction, surcharging or soil reinforcement)
- C. There is not a planned use for it at the time it is produced (even if one is "found" later e.g. a noise bund) intention to reuse is important
- D. It is a secondary product of an industrial process (e.g. PFA, colliery spoil) or a secondary aggregate i.e. not being used for the first time (e.g. rail ballast, aggregate previously used for a site compound / haul road)

Material is not considered 'waste' in the following situations:

- A. Naturally occurring excavated material (e.g. soil), reused on the same site where it was produced without any need for treatment this could include backfilling of excavations or using soil arising from one part of the site in another area. Note: production of an MMP and a CL:AIRE Code of Practice declaration (in England / Wales, different requirements in Scotland) may be required, especially where there are elevated levels of contaminants, even where no treatment is required (see E09 Use of Materials on Projects for further information)
- B. Material reused on the same site that is subject to soil improvement techniques which are solely to improve their geotechnical properties (lime / cement stabilisation, compaction, surcharging, piling, reinforcement)

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

**Project Manager** 

#### 5.2 Waste Classification and Testing

If the composition of the waste is not known, or there is reason to suspect it is contaminated, testing will be required. WAC (Waste Acceptance Criteria) testing is not suitable for classification of soils as non-hazardous / hazardous, only if it is suitable for landfill. Only waste classification testing can be used to determine hazardous / non-hazardous.

Waste soils are legally classified in the List of Wastes as 'mirror entry', i.e. there are two possible EWC codes:

- 17 05 03\* soil and stones containing hazardous substances
- 17 05 04 soil and stones other than those mentioned in 17 05 03\*

To identify which code applies to any soil, the waste producer must determine:

- What hazardous substances are present
- Their concentration
- Their chemical classification
- Whether the above is at or above hazardous waste thresholds

The EWC code 17 05 04 cannot legally be assigned to waste soils until this assessment has been carried out through waste classification.

Testing is not likely to be needed for waste streams placed in skips; it is predominantly soils and aggregates that will require testing.

At the time of transfer all waste must be identified using a 6 digit EWC code obtained from the List of Waste Regulations (or European Waste Catalogue in Scotland). The List of Waste is divided into twenty chapters, each relating to the basic operation which has produced the waste. Section 17 relates to construction, although there are other chapters which will be used when identifying waste.

A searchable list of EWC codes can be found at: <a href="http://wastesupport.co.uk/ewc-codes/">http://wastesupport.co.uk/ewc-codes/</a>.

#### 5.3 Waste Hierarchy

The Waste Hierarchy is the order in which options for waste management should be considered, based on their environmental impact. It is a legal requirement for any organisation producing waste to apply the hierarchy of options in the following order:

- 1. Prevention / Minimisation reduce the amount of waste we produce in the first place. During site set-up and the construction phase, the site team should consider ways to minimise the amount of waste produced e.g.
  - Buy materials on a take-back basis if possible
  - Require suppliers to take back pallets for reuse
  - Store materials so as to prevent accidental damage
  - Return materials to the storage area when not in use
  - Changes to design to eliminate waste, e.g. the use of precast elements
  - Use the VolkerSwitch app to advertise surplus materials to the wider business rather than having to dispose of them
- 2. Reuse reuse materials in their current form, without any need for processing / treatment e.g. use soils excavated from one part of the site in another area; reuse bricks / stone from demolition of a structure to build a wall. Waste may also be reused off-site note that this may require the other site to have some form of permit, license or exemption.

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

#### 5.3 Waste Hierarchy (Continued)

- 3. Recycling turn waste into a new product e.g. segregate scrap metal, wood, plastic etc. for recycling; send mixed waste to a Transfer Station / Materials Recycling Facility, where the recyclable proportion of it will be separated out.
- 4. Recovery e.g. energy from waste incineration, using waste in the place of other fuel for the production of energy by incinerators.
- 5. Landfill landfill should be considered as the last resort and only used if all the other options have been considered and found to be unfeasible.



#### 5.4 Use / Treatment of Waste

Generally, any use or treatment of waste requires some form of consent from the Regulator - this may be an exemption, Permit, position statement or other approved mechanism demonstrating the 'non-waste' status of the material.

A common example is a U1 exemption for Use of Waste in Construction, see E09 *Use of Materials on Projects* for further information. Note, there are strict limits upon quantities of waste that can be used under waste exemptions. The use of any waste exemption either on or off site should always be discussed with an Environmental Manager.

Note that recycled aggregates and soils are still considered a waste unless they can demonstrate 'end of waste' status through one of these mechanisms (see E09 *Use of Materials on Projects* for further information).

If a mobile crushing / screening unit is to be used, the site must obtain a copy of the Operator's Part B Permit (issued by the local authority where the Operator's head office is based). A copy of this Permit and notification of the proposed activity should also be supplied to the local authority for the project (if different).

A permit / license / exemption for the receiving facility is still required if the intention is to transfer the recycled waste away from the site once processed.

There are some low risk activities that do not require a permit. For example, treatment that assists with the transportation of the waste, or the separation of the component parts to aid collection providing this treatment does not change the physical, chemical, or biological nature or the composition of the waste.

There are other exemptions, Speak to your Environmental Advisor for more information.

Project Manager

Project Manager

Project Manager

Project Manager

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

#### 5.5 Storage of Waste

Waste must be stored securely at all times in a manner that prevents its escape. Skips / containers must be clearly labelled, checked to ensure they are in good condition and wherever possible stood on hardstanding.

Project Manager

A covered skip should be used for any waste that could create odours, windblown nuisance, or attract pests / wildlife (e.g. general office / canteen waste); in remote locations where fly-tipping could be an issue; or in areas where waste could cause pollution (e.g. adjacent to water bodies).

Project Manager

Hazardous waste must be segregated from inert and non-hazardous waste; different types of hazardous wastes must also not be mixed. Hazardous wastes must be stored in secure, labelled containers / areas to prevent pollution of the surrounding land / nearby watercourses.

Project Manager

It may be appropriate to segregate different waste types to aid recycling dependant on the quantities produced, area available for storage etc. If a mixed waste skip is used, it should be sent to a Waste Transfer Station / Material Recycling Facility for sorting to maximise recycling rates.

In Wales, from April 2024, recyclable materials shall be separately stored and collected including paper and card, glass, metal, plastic and cartons, unsold small electrical and electronic equipment, and textiles.

Project Manager

In Scotland (current) and Wales (from April 2024), it is a legal requirement for food waste to be stored and collected separately for any site that produces more than 5kg of food waste per week. In England, food shall be separated from general waste where practicable.

In England, food waste must be stored and collected separately from other waste streams from 30 June 2024. Four other recyclable materials typical of household wastes that also arise from offices shall also be separately stored and collected (permitted to store and collect these items together but not mixed with other waste streams) including glass packaging (bottles and jars), metal packaging (tins, cans, foil etc), plastic packaging (bottles, pots, tubs, strays and tubes etc), paper and card (exemptions listed such as padded envelopes). For more details on the waste types refer Separation of Waste Regulations.

Project Manager

Where waste is transferred from a project location back to a main site in readiness for onward disposal or recovery, a waste exemption may be required for the main site. A waste exemption must be registered with the regulatory authority and may have restrictions including the amount of waste or how the waste must be handled.

In England and Wales the temporary storage of waste at the place of production, pending its collection, does not require a permit from the regulator, providing no waste is stored for no longer than 12 months, and the waste is stored in a secure place.

In Scotland, similar restrictions apply, speak to your Environmental Advisor for more information.

There are other exemptions relating to the storage of waste, Speak to your Environmental Advisor for more information.

Waste may be brought back to a central location / transported between sites for ease of storage and disposal or until a sufficient quantity has been produced. If the waste is non-hazardous, there is no requirement for documentation to transfer it between

locations, providing that it remains within the custody of the same legal entity.

If hazardous waste is being transferred, a hazardous waste consignment note must be used. If a third party waste contractor is being used the consignment note will be completed by the third party. If a VW UK company is responsible for moving the waste then E04-03 *Hazardous Waste Consignment Note* must be completed to document the transfer.

**Project Manager** 

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

#### 5.5 Storage of Waste (Continued)

Certain wastes are banned from landfill altogether and must be segregated and disposed of to an appropriately licensed site, for example:

**Project Manager** 

- Tyres
- · Liquid wastes
- Clinical waste
- Flammable materials
- Batteries
- WEEE (Waste Electrical and Electronic Equipment)

#### 5.6 Invasive Species

Any material containing any part of a non-native invasive species plant (e.g. Japanese Knotweed, Himalayan Balsam, Giant Hogweed) must be classified as controlled waste and segregated and stored to avoid contaminating other materials (e.g. on an impermeable surface). This waste must be sent off site for disposal at a suitable landfill (not a recycling facility) that can accept invasive species (usually a deep fill site).

**Project Manager** 

All waste transfer notes or hazardous waste consignment notes must include a clear description that the waste contains invasive species. Where soils contaminated with invasive species are transported off site, they must be in a covered skip or sheeted wagons. Where invasive species material has been treated with herbicides before disposal, the waste needs to be tested and classified as it may be hazardous waste.

See <a href="https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants">https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants</a> for further guidance on how to deal with invasive species and their disposal or RPS 178: <a href="https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178">https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178</a> (England). Or the SEPA Technical Guidance Note: <a href="https://www.sepa.org.uk/media/154142/onsite mangaement of-japanese\_knotweed\_associated\_soils.pdf">https://www.sepa.org.uk/media/154142/onsite mangaement of-japanese\_knotweed\_associated\_soils.pdf</a> (Scotland).

#### 5.7 Export of Waste for Recovery or Disposal

Under no circumstances should waste be exported outside the UK for treatment or disposal without the authorisation of the VW UK Corporate Responsibility Director.

Specific legislation applies to the Transfrontier Shipment of Waste and additional authorisations from the Regulatory Authorities would need to be in place if any such movement was authorised in principle.

Project Manager

#### 5.8 Duty of Care - Registered Waste Carriers

Where any VW UK company is transporting waste in the course of their own business, they must have registered as a waste carrier. All vehicles used to transport waste should hold a copy of the carriers licence.

Environmental team

Carriers that are registered in England or Wales must be registered as an Upper Tier waste carrier to carry construction waste. Only charities can remove construction waste under a Lower Tier registration. The registration level can be checked on the Public Register. Upper Tier registrations expire every three years, Lower tier registrations have no expiry.

Project Manager / Waste Coordinator

Carriers that are registered in Scotland must be registered as a waste carrier with SEPA to carry construction waste. Charities can remove waste as long as they are entered on SEPA's 'register of professional collectors and transporters of waste' - contact the local SEPA Registry office to confirm this.

A carrier registration is valid across Great Britain (England, Wales and Scotland) regardless of which of those three countries it was registered in. A carrier registered in Northern Ireland only cannot legally carry waste in Great Britain.

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### RESPONSIBILITY

#### 5.8 Duty of Care - Registered Waste Carriers (Continued)

Proof of a waste carriers registration with the regulator is required **Before** waste is removed from site. The licence can also be checked using the regulators public register.

Copies of waste carrier licenses / duty of care checks on public registers must be saved to CDE (project folder 11.9.8) or kept as a hard copy.

#### 5.9 Duty of Care - Authorised Waste Management Facilities

A full copy of the permit / other license / exemption for the site where the waste will be taken to must be obtained prior to the waste being removed from site, including the list of waste types that can be accepted, and checked to ensure that the type of waste being sent there is listed and that no specific exemptions would affect it (e.g. where the permit explicitly prohibits acceptance of waste contaminated with asbestos or invasive species).

This must be done irrespective of the waste type or its classification.

Only certain prescribed activities are allowed under waste exemptions; if an exemption is provided by a waste management facility, check with the local business unit environmental team that this is sufficient. A record of the quantity of waste already received by the exempt site must also be obtained, to ensure that the total quantity limit is not exceeded.

NOTE: If unsure of any of the above, please seek advice from your local environmental team.

Copies of waste management facility permits / licenses / exemptions must be saved to CDE (project folder 11.9.7) or kept as a hard copy.

#### 5.10 Checks on Disposal

Checks that the waste has actually reached the intended disposal site may be made e.g. by telephoning the site to check whether it has arrived, requesting a copy of the weighbridge ticket, following a wagon etc.

This is recommended on an occasional basis for excavated materials such as soil, and if there is any reason to suspect non-compliance (e.g. turn-around times too quick, carrier not taking full loads). Analysis of this can be made using time and registration details from the Duty of Care notes.

## 5.11 Duty of Care - Waste Transfer Notes / Waste Information (Inert / Non-hazardous Waste)

Anyone who transfers waste has a duty of care to provide a written description of the waste to allow the waste to be handled correctly and safely through to its final destination.

A Waste Transfer Note / Waste Information must be correctly completed for all transfers of inert and non-hazardous waste off site.

The WTN must legally include:

- Written description of the waste and its quantity
- Whether it is loose or in a container and what type of container
- Relevant EWC / LOW code(s)
- Date, time and place of transfer
- SIC (Standard Industrial Classification) code of the producer
- Declaration that the waste hierarchy has been applied
- Name and address of transferor and transferee (and signed by both parties)
- The Waste Carrier's registration number and registering office

Project Manager / Waste Coordinator

Project Manager / Waste Coordinator

Project Manager / Waste Coordinator

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

## 5.11 Duty of Care - Waste Transfer Notes / Waste Information (Inert / Non-hazardous Waste) (Continued)

It is the responsibility of the **waste producer** to ensure that a WTN is correctly completed. A 'season ticket' WTN can be used for repeated transfers of the same type of waste to the same carrier and waste management facility, which can last for up to 12 months.

If there are several sites serviced by the same carrier with the same types of waste collected, they can be listed in a schedule to the transfer note rather than each holding their own transfer note. E04-02 *Waste Transfer Note* (or business unit specific version) can be used for either of the above.

Further information regarding VolkerHighways Waste Transfer Note can be found in E04-02G-VH *Waste Transfer Note Guidance*.

Copies of all non-hazardous waste documentation must be stored in CDE (project folder 11.9.9) or kept as a hard copy for a minimum of two years following project completion.

#### 5.12 Duty of Care - Consignment Notes (Hazardous Waste) - England & Wales

All transfers of hazardous waste must be accompanied by a consignment note.

Before removal of any hazardous waste from sites in England and Wales, sections A to D of a HWCN are to be completed (this is usually supplied by the waste contractor, but E04-03 *Hazardous Waste Consignment Note* may be used if required.

The responsibility for ensuring the information entered into parts A and B are correct rests with the Waste Producer / Consignor. Part C is completed by the Waste Carrier. Part D is completed by the Waste Producer / Consignor.

Upon collection of the waste, one copy of the HWCN is to be retained on site and two copies given to the waste carrier.

The site should receive a return from the disposal site within a month of the end of the quarter in which the waste was disposed of or fully recovered, certifying that the waste has been dealt with and what disposal option has been applied - this should be kept on file with the original HWCN.

The Material Safety Data Sheet for the waste (if relevant) may provide information to assist in the completion.

Any site in <u>Wales</u> that is likely to produce more than 500kg of hazardous waste in a 12-month period must be registered with Natural Resources Wales as a hazardous waste producer and issued with a unique Premises Code (there is no requirement for sites in Scotland or England to be registered).

The Premises Code will be required by any hazardous waste contractor and must be referenced on all Hazardous Waste Consignment Notes relating to the contract.

Copies of all hazardous waste documentation must be saved in CDE (in folder 11.9.9) or kept as a hard copy for a minimum of three years following project completion.

#### 5.13 Duty of Care - Consignment Notes (Hazardous Waste) - Scotland

Before removal of any hazardous waste from sites in Scotland, the SEPA office local to where the special waste is being sent to must be notified at least 3 working days' in advance of the waste being moved, by sending them the white copy of the SWCN (with Parts A and B completed) - this is usually completed by the waste carrier. The waste must then be moved within one month of this notification.

Before the waste is removed from site, Parts A to D of the SWCN must be completed (by the VW UK business unit / the waste carrier as appropriate) - the green copy of the SWCN is to be retained on site and the remaining copies given to the waste carrier.

Project Manager / Waste Coordinator

Project Manager / Waste Coordinator

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#### 5. ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

n/a

#### 5.13 Duty of Care - Consignment Notes (Hazardous Waste) - Scotland (Continued)

Copies of all hazardous waste documentation must be saved in CDE (in folder 11.9.9) or kept as a hard copy for a minimum of three years following project completion.

Project Manager / Waste Coordinator

#### 5.14 Use of Waste Brokers

If a waste broker (e.g. Reconomy, Ecofficiency, AMA etc) is used, this does not remove the responsibility from the VW UK business unit to ensure that all the Duty of Care requirements outlined above are in place.

Project Manager / Waste Coordinator

Waste brokers must be registered as such with the EA / NRW / SEPA.

See the section 5.8 'Duty of Care - Registered Waste Carriers' for how to check that a waste broker is registered.

Project Manager / Waste Coordinator

#### 5.15 Monitoring

Everyone on site has their role to play in ensuring that waste is managed in accordance with legal requirements, particularly in terms of preventing the escape of waste and ensuring correct waste segregation.

Project Manager / Waste Coordinator

The Project Manager / Waste Coordinator needs to ensure:

- · Waste storage facilities are fit for purpose
- · Waste is appropriately segregated
- Checking the waste transfer note / consignment note has been completed accurately before waste leaves site
- There is no cross contamination of different waste streams

The Project Manager / Waste Coordinator (with support from the Environmental Advisor) also needs to ensure:

- Waste is stored in accordance with permits / exemption requirements
- Waste minimisation opportunities have been adequately explored
- The SWMP has been correctly completed and is kept up to date
- Where required, a materials management plan has been produced and is adhered to
- That duty of care checks have been completed on all waste carriers, brokers and disposal contractors

#### 5.16 Audits

Waste brokers and / or waste facilities may be formally audited in accordance with Q03 *Audit* procedure, applying external supplier audits to incorporate compliance checks on waste suppliers and brokers to ensure that VW UK's Duty of Care responsibilities are being met.

VW UK Business Unit

#### 5.17 Site Waste Management Plans (SWMP)

A SWMP may be provided by the Client / Designer, with project details, measures taken to design out waste and an estimate of the types and quantities of waste likely to be produced. This information is to be transferred into E04-01 *Site Waste Management Plan*.

Project Manager / Waste Coordinator

Unless an alternative format is required by the client, E04-01 *Site Waste Management Plan* should be completed at the appropriate points during the contract (see E04-01G *Site Waste Management Plan Guidance*).

Project Manager / Waste Coordinator

Waste information provided by a waste broker service should be transferred onto the contract SWMP on a monthly basis.

Project Manager / Waste Coordinator

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v v v v v v v n/a

#### ACTIONS (PROCESS) (CONTINUED)

#### **RESPONSIBILITY**

#### 5.17 Site Waste Management Plans (SWMP) (Continued)

Once contracts are set up for the removal of wastes, the SWMP must be updated with details of the waste carriers and disposal sites that the various waste types are to be taken to.

Project Manager / Waste Coordinator

As a minimum, the SWMP must be updated on a monthly basis with the actual quantities and destinations of each type of waste generated. SWMPs should be up to date by the end of each month to allow accurate waste information to be reported in the VW UK business unit monthly reports.

The contract SWMP should be kept on and managed through CDE (folder 11.9.10) and kept for a minimum of two years following project completion

#### 5.18 Subcontractor Waste

On sites where VW UK provides the skips or other containers for subcontractors to deposit their waste, the site team is responsible for ensuring that the Duty of Care requirements are met and must provide the subcontractor with relevant information if asked.

Project Manager / Waste Coordinator

Where a subcontractor makes their own arrangements for waste disposal, the site team must obtain evidence that they have complied with the Duty of Care requirements (as detailed above) by obtaining copies of their documentation, and include their waste information in the Site Waste Management Plan and on CDE.

Project Manager / Waste Coordinator

Where VW UK is not the Principal Contractor or otherwise not responsible for arranging for the disposal of waste, evidence must be obtained by the site team to demonstrate that the waste is being disposed of in accordance with the Duty of Care requirements, by requesting copies of the documentation.

Project Manager / Waste Coordinator

#### 5.19 Further Information - VolkerStevin

VolkerStevin staff that require more information on the management of waste please use E04-G01-VS *VolkerStevin Waste Management Guidance*.

#### 6. ASSOCIATED GUIDANCE & INFORMATION

- E04-G01-VS VolkerStevin Waste Management Guidance
- E04-01G Site Waste Management Plan Guidance
- E04-02G-VH Waste Transfer Note Guidance
- E09 Use of Materials on Projects
- VolkerSwitch app (available via MS PowerApps)
- Waste Duty of Care: Code of Practice
- CL:AIRE Definition of Waste: Development Industry Code of Practice
- Quality Protocol 'Aggregates from Inert Waste'
- CECA Waste Classification and Permitting in Construction

#### 7. DOCUMENTATION (OUTPUTS)

Standard VolkerWessels UK Record Documents are referenced in brackets. Where alternative formats are used, they shall contain the same or additional content.

- (E04-01 Site Waste Management Plan) (Client version / Broker portal)
- (E04-02 Waste Transfer Note)
- (E04-02-VS Waste Transfer Note)
- (E04-02-VH Waste Transfer Note)

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#### 7. DOCUMENTATION (OUTPUTS) (CONTINUED)

- (E04-03 Hazardous Waste Consignment Note)
- Waste Carrier Licenses
- · Waste disposal / Installation site permits, licenses and exemptions

#### 8. ISSUE RECORD

Issue	Date	Comments
1 - 10	Dec 2023	Please review 'Issue Record' Section in Issue 10 for a log of changes between Issue 1 and Issue 10.
11	Jan 2024	Content changes made to E04 to Section 5.5 Storage of Waste.
12	Jan 2024	A minor amendment to E04-03, to fulfil legal compliance, we have added an extra box to record an additional letter at the end of the consignment note code.
13	Aug 2024	The E04 procedure has been updated with revisions in Section 3, 'References (Inputs)', and Section 5.5, 'Storage of Waste'. These updates include the addition of two new regulations impacting waste segregation in England.

#### 9. WHAT HAS CHANGED IN THIS LATEST ISSUE AND WHY

E04 Waste Management procedure has been updated with revisions in Section 3, 'References (Inputs)', and Section 5.5, 'Storage of Waste'. These updates include the addition of two new regulations impacting waste segregation in England.

The updates are necessary due to the 'The Separation of Waste (England) Regulations 2024' and 'The Separation of Waste (England) (No.2) Regulations 2024'. These regulations require the separate storage of specific recyclable materials and food waste, effective from June 30th, 2024.

#### 10. BRIEFING REQUIREMENTS

All new employees will receive an introduction to the Integrated Management System (IMS) at induction, according to the nature of the role.

All employees with an email address receive the 'Record of Revisions' each month, which details changes to the IMS. All Line Managers retain the responsibility to ensure their staff are briefed on changes as appropriate.

The following table defines how revised issues of this document are briefed to existing employees according to related specific responsibilities.

Job role, department, function	Method of briefing revised issue		
CR Director	CR Director is the document owner, approves changes, no briefing required.		
HSEQS Leads	Briefing from the CR Director.		
Business Unit Environmental Staff, including Project / Contract Managers	Targeted Email by HSEQ Leads and briefings if required.		
All Employees	Record of Revisions and cascade briefings as appropriate.		

#### 11. IMS AUTHORISATION

Document owner approval:

Adrian Shah-Cundy, CR Director - 09.08.2024

Approval for IMS:

Eleanor Collins, IMS Administrator - 13.08.2024

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