



Waste Management

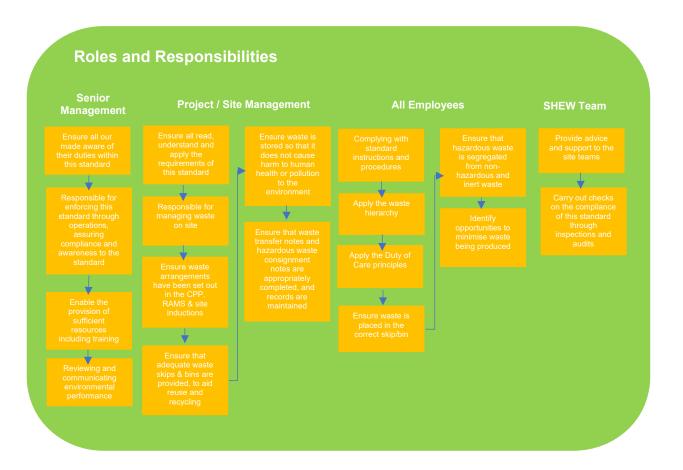
Safe People
Happy People
Sustainable Business

Key messages

All Bridges employees are responsible for applying the waste hierarchy and waste Duty of Care principles, both of which are legal requirements.

Waste must also be stored in a way that keeps it secure and does not allow it to cause harm to human health or the environment.

When waste is transferred, we have a legal responsibility to ensure the appropriate documentation is in place and that the duty of care checks are completed.



Definitions

Waste	Any substance or object which the holder discards or intends or is required to discard.		
Controlled Waste	Waste that is subject to legislative control in either its handling and/or its disposal. The		
	Regulations define controlled waste as household, industrial and commercial waste.		
Hazardous Waste	Waste that is harmful to human health or the natural environment. Examples include		
	waste oils, solvents, discarded chemicals. batteries		
Inert Waste	Waste that does not undergo any significant physical, chemical or biological		
	transformations		
Non-Hazardous Waste	All other waste that does not fall into the inert or hazardous categories. Examples		
	include, paper, canteen waste, mixed waste skips.		
Duty of Care	The Duty of Care is a legal requirement and applies to anyone who 'imports, produces, carriers, keeps, treats or disposes of waste or, as a broker, has control of such waste.' The		
	duty of care remains until the waste has reached it final destination.		
Environmental Permit	An authorisation issued by the Environment Agency permitting the undertaking of a waste storage, treatment or disposal operation.		
Waste Exemption	A waste operation that is exempt from the requirement to hold an Environmental Permit. There are many exemptions and each has its own specific conditions and limits, including a description of the activity that can be carried out and limits on the waste types and quantities to which the exemption applies.		

Definitions

Definitions (cont)

	EWC Code (European Waste	EWC codes are a six-digit code assigned to individual controlled wastes to aid			
	Catalogue Code)	classification. The code is determined by the process that produces the waste.			
	Waste Transfer Note	A legal document that records the transfer of inert and non-hazardous waste from one			
		waste holder to another.			
		Waste transfer notes must be retained for 2 years.			
	Annual Season Ticket	A single waste transfer note that covers a series of inert/non-hazardous waste transfers			
		It can last up to 12 months and is used for regular transfers of the same type of			
		inert/non-hazardous waste with the same carrier.			
Definitions	Hazardous Waste	A legal document used to record all movements of hazardous waste, including			
	Consignment Note	 Collections from businesses by registered carriers 			
		 Movements from one Bridges premises to another Bridges premises 			
		All movements from the waste producer's premises			
		All consignment notes must be retained for 3 years.			
	Standard Industry	A SIC code is used for administrative purposes as a method of classifying industrial			
	Classification (SIC)	activities. It is required on waste transfer notes and consignment notes to show which			
		type of industry has produced the waste described on the document.			
		The SIC code relevant to Bridges are 43210 Electrical Installation			
	Waste Broker	Any person, business or organisation that arranges waste transportation and			
		management of waste on behalf of another party			
	Waste Carrier	A person, establishment or company that transports controlled waste in the course of			
		any business or with a view to profit, including those that produce and transport their			
		own waste.			
		A waste carrier must be registered with the environmental regulator (e.g., EA) and hold			
		an upper or lower tier registration certificate to carry waste.			
	Waste Exemption	A waste operation that is exempt from an Environmental Permit. There are exemptions			
		for the use, storage, treatment and disposal of waste. Each has specific conditions and			
		limits that must be complied with.			
	Waste Management Facility	A site holding an environmental permit or exemption issued by the EA authorizing the			
	or Site	management of waste.			
	Waste Producer	Any person, company or legal entity whose activities produce waste.			

1. Purpose and Scope

This standard sets out the waste management requirements for waste that is generated by activities undertaken by Bridges or its sub-contractors.

2. What is Waste?

2.1 What is waste?

"Waste" is defined in law as any substance or object which the holder:

- Discards, or
- Intends to discard, or
- Is required to discard.

Examples of waste Bridges produce include wood, metal, plastic, cable, general waste, paper etc.

There are three main types of waste

Inert Waste – Will not dissolve, burn or otherwise react, biodegrade or adversely affect matter it
comes into contact with in a way likely to cause environmental pollution or harm human health.
Examples of inert waste types include bricks, concrete, tiles, ceramics, glass and some subsoil.





2. Non-hazardous waste – they can cause pollution and harm to humans if not managed correctly. Examples include; general waste, plastic, metal, wood and paper.



3. Hazardous waste – wastes deemed dangerous to life and/or damaging to the environment. Examples include; paints, oils, diesel, petrol and chemicals.





3. Waste Segregation and Storage

All waste has the potential to cause harm to human health or pollute the environment if you do not handle or store it properly.

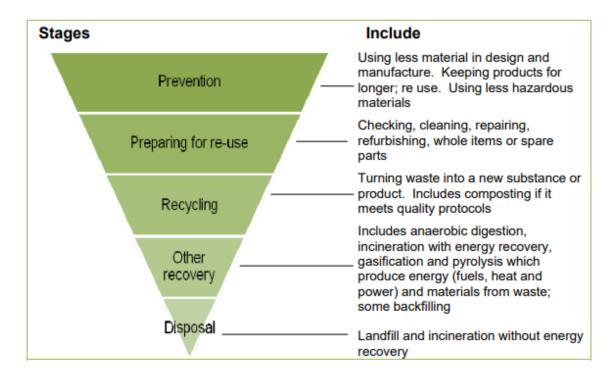
Below is a list of good practice measures for waste storage:

- Keep waste in a secure and tidy area. Ensure that your storage facilities are secure against vandalism, theft and accidental damage
- · Store all containers with lids, caps and valves secured in place
- Label containers/skips clearly with their contents
- · Non-hazardous waste and hazardous waste must be segregated and stored separately
- Different types of hazardous waste must not be mixed
- Inert waste should be segregated wherever possible to enable recycling and reduce costs
- Store waste in suitable and well-maintained containers that ensure the waste does not escape e.g. windblown litter / leaks
- Store liquid wastes with adequate secondary containment
- Locate storage areas away from environmentally sensitive areas, watercourses and surface water drains
- Do not store waste for over 12 months

4. The Waste Hierarchy

4.01 Waste Hierarchy Principles

To meet legal requirements, wastes must be managed in line with the 'waste hierarchy'. The waste hierarchy is a system that ranks waste management options according to what is best for the environment. The waste hierarchy starts with the prevention of waste as the best environmental option and ends with disposal as the worst environmental option.



When selecting a waste management option, we have a legal duty to consider all reasonable steps to prevent, reuse, recycle or recover waste (in priority order). We must choose the option that achieves the best overall environmental outcome. Applying the waste hierarchy not only benefits the environment but it can also save money. Waste management options at the top of the hierarchy are generally cheaper compared to those at the bottom and diverting waste away from landfill means we do not pay landfill tax.

The below table illustrates how the hierarchy applies for common materials and products.

Wood	Paper and Card	Metals	Plastics±	WEEE
Prevention	Prevention	Prevention	Prevention	Prevention
Preparation for re-use	Preparation for re-use	Preparation for re-use	Preparation for re-use	Preparation for re-use
Recycling; energy recovery • (preferable to recycling for lower grade	Recycling	Recycling	Closed loop recycling Other recycling	Recycling (esp. suitable for metals and high quality plastic)
materials)	Energy recovery ◆ (esp. suitable for short fibres or contaminated materials)	Recycling after energy recovery	Energy recovery◆	Energy recovery (esp. suitable for non- hazardous mixed plastic)
Disposal	Disposal	Disposal	Disposal	Disposal

Source gov.uk

5. Waste Duty of Care Responsibilities

5.1 Waste Duty of Care

Waste Duty of Care is a legal requirement, that makes provision for the safe management of waste to protect human health and the environment. The waste duty of care applies to any person who imports, produces, carries, keeps, treats or disposes of certain waste. To ensure we meet our duty of care responsibilities, we must ensure we carry out appropriate checks and that we have appropriate documentation. Failure to comply with the waste duty of care is a criminal offence and could lead to prosecution.

All Bridges employees involved in waste management i.e., site supervisors, site managers, procurement department, and the delivery department must ensure that all reasonable steps are taken to comply with the waste duty of care responsibilities:

- A. Ensure that waste is contained so that it cannot escape.
- B. Ensure that any person that you transfer waste to has the correct authorisations and that you have accurately described the waste
- C. Ensure that waste shall not be illegal disposed or dealt with in a way that causes, or may cause, pollution or harm to human health

5.2 Waste Duty of Care Checks

A. Registered certificate for the waste carrier or broker

Waste must only be transferred to a registered waste carrier or waste broker. A copy of the waste carrier's or broker's licence must be obtained from the contractor and then checked against the relevant public register to ensure it is still valid (within date).

England – Public Registers Online <u>environment.data.gov.uk/public-register/view/index</u>
Wales – Public Registers <u>naturalresources.wales/permits-and-permissions/check-for-a-permit-licence-or-exemption/?lang=en</u>

B. Environmental permit or registered exemption for the waste management facility

Waste must only be transferred to a suitable permitted or exempt facility. A copy of the waste management site's environmental permit or regsitered exemption must be obtained from the contractor and checked against the relevant public register to ensure it is still valid (within date). The environmental permit or registered exemption

England – Public Registers Online <u>environment.data.gov.uk/public-register/view/index</u>
Wales – Public Registers <u>naturalresources.wales/permits-and-permissions/check-for-a-permit-licence-or-exemption/?lang=en</u>

5.3 Duty of Care Documentation

The type of legal documentation required depends on the type of waste and who it is being transferred to:

- A. For inert / non-hazardous waste a waste transfer note or annual waste transfer note is required when waste is transferred from one holder to another (e.g., from Bridges to a waste carrier)
- B. For hazardous waste a consignment note is required every time hazardous waste is transferred

5.3.1 Waste Transfer Notes

Waste transfer notes are legal documents that must be used when inert or non-hazardous waste is transferred from one waste holder to another. Waste transfer notes come in different formats such as paper or electronic, they have different layouts, but by law they must all contain certain information.

A waste transfer note must contain the following:

- A written description of the waste (e.g., wood)
- The six-digit waste classification code known as the EWC code (see section XX)
- The quantity of the waste
- How the waste has been packed / contained
- The date, time and location of the transfer
- The Standard Industrial Code (SIC) code for the transferor 43210 Electrical Installation
- The name, address and signature of both the transferor (the Bridges site/office and address) and the transferee (the company receiving the waste)
- The capacity in which the transferer (Bridges) and the transferee (the person receiving the waste) are acting e.g., the producer/holder of the waste, the waste carrier etc.
- The relevant registrations for both the company transferring the waste, the waste carrier licence number and the company receiving the waste, the environmental permit number, waste exemption registration number
- A statement confirming that you have applied the waste hierarchy principles

The waste transfer note needs to be signed by a Bridges representative and a representative of the company transferring the waste, the waste carrier, prior to the waste leaving the site

When reviewing a waste transfer note, the Waste Transfer Note Checklist, BHS F002 can be used to ensure all relevant information has been included.

By law, copies of all waste transfer notes must be held for two years.

The waste transfer notes provided by the waste carrier can be used as long as the waste transfer note contains all the information legally required. The Governments waste transfer note is available on the intranet. (See 5.3.5). This can be used if the waste carrier has not provided a waste transfer note, or the waste carriers transfer note does not contain all the information legally required.

5.3.2 Annual waste transfer notes

An annual waste transfer note is a single waste transfer note that covers a series of inert / non-hazardous waste transfers. An annual waste transfer note can last up to one year and is used for regular transfers of the same type of inert / non-hazardous waste with the same carrier.

5.3.3 Hazardous Waste Consignment Notes (HWCN)

Hazardous waste consignment notes are legal documents that must be used every time hazardous waste is transferred. The HWCN must be produced, and the correct details entered before the hazardous waste is moved. The waste carrier in most instances will create the HWCN.

A hazardous waste consignment note must contain:

- Unique consignment note code
- Name and address (including postcode) of the site the waste is being removed from
- Name and address (including postcode) of the facility the waste is being taken to
- Process giving rise to the waste (e.g., diesel spill)
- The Standard Industrial Code (SIC) code for the process that produced the waste 43210 Electrical Installation
- Written description of the waste
- The six-digit waste classification code known as the EWC code (see section XX)
- Quantity of waste (KGS)
- Chemical and biological components in the waste and their concentrations
- Physical form of the waste (gas, solid, powder, sludge or mixed)
- Hazard codes for the waste e.g., HP7 carcinogenic
- UN identification numbers (if applicable)
- Carrier's name, address (including postcode)
- Waste carrier's registration number and vehicle registration number
- Date, time and signature of both parties
- Confirmation the waste hierarchy has been implemented

Part A – notification details – records the origin and destination of the waste – completed by the waste producer (Bridges)

Part B – Description of the waste - the Standard Industrial Classification (SIC) code is 43210 Electrical Installation - completed by the waste producer (Bridges)

Part C – waste carrier certificate and details - completed by the waste carrier

Part D – consignor's (the person/company who causes the waste to be removed) certificate – completed by the waste carrier

Part E – consignee (receiver) certificate – completed by the final destination i.e., waste transfer station

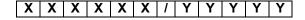
The HWCN needs to be signed by a Bridges representative and a representative of the company transferring the waste, the waste carrier, prior to the waste leaving the site

Bridges as the produce/holder of the waste, should receive a completed HWCN from the consignee (receiver) once the waste has been received and the consignee has completed Part E of the HWCN.

HWCN must be held for three years.

5.3.4 Hazardous Waste Consignment Note Codes

All hazardous waste consignment notes must have a unique consignment note code. The format for the consignment note code is:



XXXXXX is the first 6 letters of the name of the company, e.g., BRIDGE YYYYY is 4 numbers or letters chosen by the waste management company or Bridges.

5.3.5 Templates for waste transfer notes and hazardous waste consignment notes

The government publishes blank templates for a waste transfer note and a hazardous waste consignment note. These templates will be used to when Bridges are required to generate a transfer note.

- Waste Transfer Note Template
- Hazardous Waste Consignment Note

5.3.6 Bridges Waste Carrier's Licence

Bridges is registered as a waste carrier (ref: CBDU169924). It is the responsibility of the SHEW Department to ensure the licence is renewed when required. A copy of the registration can be found on the Bridges Intranet.

6. How to classify your waste

It is a legal requirement that waste must be described and assigned the appropriate European Waste Catalogue (EWC) code before any waste leaves site. The EWC code must be recorded on the waste transfer note or HWCN.

All EWC codes are colour coded as follows:

- Black absolute non-hazardous waste types
- Red hazardous waste types
- Blue mirror hazardous waste types
- Green mirror non-hazardous waste types

Hazardous waste codes are always identified with an asterisk (*) at the end of the EWC code.

6.1 Absolute non-hazardous waste

These waste types are always non-hazardous and do not require further assessment. Examples include:

- Paper and cardboard
- Canteen waste

6.2 Hazardous waste types

These wastes are always hazardous. Examples include:

- Coal tar and tarred products
- Acids
- Solvents

6.3 Mirror hazardous or mirror non-hazardous

If the waste is classified under mirror hazardous or mirror non hazardous entries an assessment is required to determine which mirror code is applicable. Examples include:

- Mixed metals
- Concrete
- Wood
- Metals contaminated with hazardous substances
- Cables containing oil, coal tar and other hazardous substances

Further information on waste codes can be found at https://www.veolia.co.uk/sites/g/files/dvc1681/files/document/2014/11/How_to_classify_your_waste.pdf

6.4 Assessment

The assessment may include:

- An assessment of the safety data sheet if the waste is a product whose composition has not changed, and a safety data sheet is available. This can be passed to the waste management company to classify the waste.
- Sampling, analysis and interpretation of the results if you have a waste and its chemical composition is unknown (e.g., chemical, soils) sampling, analysis and interpretation of results will be required. This must be carried out by the Bridges supply chain.

6.5 Sending Waste to Landfill

Bridges aims to send zero waste to landfill. Bridges should only use waste contractors who work with us to divert waste away from landfill.

Waste must only be consigned to a landfill for disposal if there are no alternative facilities available and if it meets the following requirements:

- It is not prohibited from landfill sites i.e., any waste in liquid form, waste that would be explosive, corrosive, oxidizing, flammable or highly flammable. Waste paper, metal or plastic that has been separately collected to prepare it for reuse or recycling
- It has a valid EWC code
- It has been pre-treated e.g., physical separation
- It has been characterized to ensure all information necessary for the safe disposal of the waste is available

7. Waste Electrical and Electronic Equipment (WEEE)

Electrical and electronic equipment (EEE) is regulated to reduce the amount of waste electrical and electronic equipment (WEEE) incinerated or sent to landfill sites.

Reduction is achieved through various measures which encourage the recovery, reuse and recycling of products and components.

The Waste Electrical and Electronic Equipment Regulations 2013 is the underpinning UK legislation.

Weee waste must be kept separate from other waste types and be collected separately. Weee often has components that contain hazardous substances or persistent organic pollutants.

When Weee waste is stored, it should be covered and protected from the weather, to prevent contaminated runoff entering surface drains and watercourses.

8. Appendix: Examples of some Hazardous Wastes

Waste Type	EWC Code		
Oil	Wastes of liquid fuels		
	13 07 01* Fuel oil and diesel		
	13 07 02* Petrol		
	13 07 03* Other fuels (including mixtures)		
	13 02 05* mineral-based non-chlorinated engine, gear and lubricating oils		
	13 02 08* other engine, gear and lubricating oils		
Absorbents, wiping clothes, protective clothing contaminated by dangerous substances (i.e. spill kits)	15 02 02* Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances (M)		
Fluorescent tubes	20 01 21* Fluorescent tubes and other mercury- containing waste		
Paint	20 01 27* Paint, inks, adhesives and resins containing dangerous substances (M)		
Detergents	20 01 29* Detergents containing dangerous substances (M)		
Chemical	16 05 07* Discarded inorganic chemicals consisting of or containing dangerous substances (M)		
	16 05 08* Discarded organic chemicals consisting of or containing dangerous substances (M)		
Asbestos	17 06 01* Insulation materials containing asbestos (M)		
	17 06 05* Construction materials containing asbestos (M)		
Batteries	16 06 01* Lead batteries		
	16 06 02* Ni-cd batteries		
	16 06 03* Mercury-containing batteries		
Aerosols	16 05 04* gases in pressure containers (including halons) containing dangerous substances (M)		
Sludges containing dangerous substances	19 08 11* Sludges containing dangerous substances from biological treatment of industrial waste water (M)		