LIVERPOOL BAY DECOMMISSIONING PHASE 1

POINT OF AYR GAS PLANT
General

Waste Management Plan

Validity Status	Revision Number	Date	Description	Prepared by	Checked by	Approved by	Contractor Approved	Company Approved
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REVISION LIST

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1.0 INTRODUCTION

1.1 Purpose of this Document

The Contractor have been commissioned to produce a Waste Management Plan (WMP) for Point of Ayr ("the Project"). This plan sets out how Contractor intends to meet and comply with specific Project commitment.
The document will be considered a "live document" that will be subject to review and revisions over the life of the Project to ensure consistency with Project activities, regulatory requirements and environmental conditions.

The purpose of this WMP is to detail the process for an initial forecast of wastes arisings, identify options for disposal and describes the process by which waste management arrangements (including identification, segregation, storage and transport) will be reviewed throughout the Contract. This plan will also include how the project will:

- Manage waste on the contract, including storage, segregation and transport on/off site.
- Minimise waste disposal to landfill by applying the waste hierarchy.
- Reduce the cost of waste disposal by identifying opportunities to apply the waste hierarchy.
- Improve performance in waste management.
- Establish general criteria to avoid or minimize environmental pollution when performing works under the Project as related to the generation, storage, transportation and disposal of waste.

This plan provides the process for an initial forecast of wastes arisings, identifies options for disposal and describes the process by which waste management arrangements will be reviewed throughout the Contract. The plan also identifies roles and responsibilities, training requirements, and control protocols to ensure effective waste management.

This document applies to Contractor and Subcontractors who will perform activities during the Project construction phases. Therefore, it is imperative that all personnel involved in the Project are familiar with the scope of this document.
Each Subcontractor will be responsible of the collection and separation of their own produced waste and of the application of the procedures described in this document.
Subcontractor will prepare its own WMP based on the Contractor's plan ensuring compliance with all the requirements imposed. Subcontractors in charge of will carry out all the activities necessary to be in line with the plan itself.
Contractor will constantly monitor and check Subcontractor's activities.

1.2 Stage Overview

The Company's Liverpool Bay Carbon Capture Storage Transport & Storage Project (LBA CCS T/S Project) is being developed in parallel with and as a key part of the HyNet Northwest full-chain hydrogen and CCS industrial decarbonisation project (the HyNet Project), which aims to transform the region into the world's first low carbon industrial cluster by 2030.

The LBA CCS T/S Project has been divided into two phases for the purpose of discharging TCPA planning conditions. The phases of work comprise of and are described as the following:

- Demolition (including Temporary Construction Facilities - TCFs)
- Construction

This document is related to the Demolition Phase only, which includes the demolition scope at the Point of Ayr (PoA) facility, as well as scope associated with the new LBA CCS FACILITY.

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Under this phase, the PoA facilities will be subject to a partial decommissioning to allow the conversion of the systems from a hydrocarbon to CCS service. The partial decommissioning of PoA systems shall be performed upon a controlled and sequential shutdown of the existing systems.

This document is related to Work Package 3 (WP3) and covers the Demolition Phase to outline procedures to prevent, manage and reduce waste that may arise during activities on site. This plan addresses implementing the waste hierarchy, waste classification, and establishes measures to safeguard environmental quality and compliance with regulations for the demolition activities only, and will be updated prior to the construction phase beginning on site. A planning layout is presented in Figure 1.1.

Figure 1.1 Work Package 3 Boundary Limit

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2.0 DEFINITIONS AND ABBREVIATIONS

2.1 Definitions

Term	Definition
Company	The party that initiates the project and ultimately pays for its design and construction i.e. ENI UK Ltd will generally specify technical requirements. The term "COMPANY" also includes agents or consultants authorized to act for, and on behalf of, COMPANY.
Contract	An acceptance of legal relations between two or more parties for the transfer of goods or services for value.
Contractor	A person or organization that undertakes responsibility for the execution of a contract, i.e. Saipem S.p.A.
Subcontractor	Any person to whom performance of any part of the Works, including engineering works or supply of any Equipment, is subcontracted directly or indirectly by the Contractor and including Approved Subcontractors and legal successors or permitted assigns.
Supplier	The party (Manufacturer or Vendor) that manufactures or supplies equipment or services to perform the duties specified by the Company or Contractor
Shall	A mandatory provision
Should	An advisory provision

2.2 Abbreviations

BEIS	Department for Business, Energy & Industrial Strategy
CCS	Carbon Capture Storage
CEMP	Construction Environmental Management Plan
CL:AIRE	Contaminated Land: Application in Real Environments
CM	Construction Manager
COSHH	Control of Substances Hazardous to Health
EA	Environmental Agency
EC	European Community
EEMS	Environmental and Emissions Monitoring System
EM	Environmental Manager
EMS	Environmental Management System
EWWR	European Week for Waste Reduction
FCC	Flintshire County Council
HCFC	Hydrochlorofluorocarbons
HFC	Hydrofluorocarbon
HSE	Health Safety Environment
LBA	Liverpool Bay
LED	Light Emitting Diode
MMP	Materials Management Plan
NORM	Naturally Occurring Radioactive Material
NRW	National Resource Wales
NWFD	Non-Waste Framework Directive
PCBs	Polychlorinated Biphenyls
PD	Project Director

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PHSEM	Project HSE Manager
PM	Project Manager
PoA	Point of Ayr
PVC	Polyvinyl Chloride
REAC	Register of Environmental Actions and Commitments
SoW	Scope of Works
TCF	Temporary Construction Facility
TCPA	Town and Country Planning Act
T/S	Transport and Storage
WEEE	Waste Electrical and Electronic Equipment
WMC	Waste Management Contractor
WMP	Waste Management Plan
WP3	Work Package 3
WTN	Waste Transferer Note

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3.0 REFERENCES

This WMP makes reference to, and should be read in conjunction with, the following documents:

3.1 Project Documents

[Ref 1]	TCPA – March 2023	T.4 Environmental Statement
[Ref 2]	TCPA – March 2023	T.5.3 Register of Environmental Actions and Commitments
[Ref 3]	ITT – Appendix E	Contract HSE Requirements
[Ref 4]	102700HFPA09755	TCF & POA DEMOLITION CEMP
[Ref 5]	102700HFPA09758	Dust Management Plan
[Ref 6]	102700HFPA09762	Materials Management Plan
[Ref 7]	102700HFPA09775	Pollution Prevention and Control Plan for Decommissioning
[Ref 8]	102700HFPA09774	Oil Spill Contingency Plan
[Ref 9]	102700HJPC09406	Construction Traffic Management Plan

3.2 Company Documents

[Ref 10]	Eni UK IMS AI-SYS-01 R15	HSE Policy
[Ref 11]	Eni UK IMS 00-SYS-01 R12	Health, Safety & Environment Management System Manual
[Ref 12]	Eni UK HSE IMS B1-SYS-03 R01	Identification of Environmental Aspects
[Ref 13]	Eni UK MS AI SYS 04 R06	Corporate Major Accident Prevention Policy (CMAPP)
[Ref 14]	1023D0BFPD09501	Waste Management Strategy
[Ref 15]	OPI HSE 021 ENI SPA	Safety & Environmental Critical Elements (SECE) Management
[Ref 16]	OPI-HSE-023-ENI-SPA R02	Safety, Environmental and Industrial Hygiene Minimum Design Requirements
[Ref 17]	OPI HSE 048 ENI SPA R01	Management of Activities in the Presence of NORM and TENORM
[Ref 18]	OPI HSE 009 ENI SPA NR R01	Emergency Response Strategy and Plan
[Ref 19]	OPI HSE 022 ENI SPA NR R01	Management of Environmental Aspects in Development Processes
[Ref 20]	OPI SG HSE 013 E&P R01	Guidelines for Oil Spill Contingency Planning
[Ref 21]	OPI SG HSE 014 E&P R01	Hazardous Area Classification Methodology
[Ref 22]	OPI SG HSE 027 E&P R01	Contract Health, Safety and Environmental Requirements for Services, Engineering, EPC, EPIC, EPF, Goods
[Ref 23]	OPI SG HSE 001 UPS R03	HSE Risk Management and Reporting
[Ref 24]	MSG HSE ENI SPA R04	Management System Guideline
[Ref 25]	BP HSE 007 eni spa_NR R01	Waste Management in Natural Resources Activities

3.3 Contractor Documents

[Ref 26]	PL-SPA-HSE-001	Saipem S.p.A. HSE Policy
[Ref 27]	MSGGR-GROUP-HSE-001	HSE Management System Guideline
[Ref 28]	CR_GR-GROUP-HSE-009	Monitoring and reporting
[Ref 29]	CR_GR-GROUP-HSE-012	Criteria for identification of significant and social aspects
[Ref 30]	CR_GR-GROUP-HSE-013	Operational control of environmental aspects
[Ref 31]	STD_GR-GROUP-HSE-002	HSE Competence, Training and Awareness
[Ref 32]	STD_GR-GROUP-HSE-004	HSE Monitoring and Improvement
[Ref 33]	FORM_GR-GROUP-HSE-012	Incident Investigation Report
[Ref 34]	FORM_GR-GROUP-HSE-014	Incident Notification
[Ref 35]	FORM_GR-GROUP-HSE-124	HSE Bulletin

3.4 International Codes and Standards

[Ref 36]	ISO 45001	Occupational health and safety management systems, Requirements with Guidance for Use

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[Ref 37] ISO 14001 Environmental Management Systems - Requirements with Guidance for Use

3.5 External References

3.5.1 National Regulations (UK-wide) Regulations

[Ref 38] Construction (Design and Management) Regulations 2015
[Ref 39] Control of Asbestos Regulations 2012
[Ref 40] Control of Substances Hazardous to Health (COSHH) Regulations 2002
[Ref 41] Environment Act 1995
[Ref 42] Environmental Damage (Prevention and Remediation) Regulations 2015
[Ref 43] Environmental Permitting (England and Wales) Regulations 2016
[Ref 44] Environmental Protection Act 1990
[Ref 45] Hazardous Waste (England and Wales) Regulations 2005
[Ref 46] Personal Protective Equipment at Work Regulations 1992
[Ref 47] Waste (Circular Economy) (Amendment) Regulations 2020
[Ref 48] Waste (England and Wales) Regulations 2011
[Ref 49] Waste Batteries and Accumulators Regulations 2009

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4.0 WASTE MANAGEMENT PLAN CONTEXT

4.1 Waste Minimisation Statement

The waste hierarchy is a principal set out in the Waste Framework Directive to prioritise actions based on sustainability. To be sustainable, waste management should not be linear but rather apply the waste hierarchy to use material resources as efficiently as possible. In order from most preferred to least preferred:

- Prevention – Designing out waste to avoid waste generation.
- Reuse – preparing waste for reuse (checking, cleaning, repairing, refurbishing whole items or spare parts).
- Recycle – converting waste materials into new materials that can be used again.
- Other recovery – methods including generation of energy from waste.
- Disposal – Landfill and incineration without any form of energy recovery.

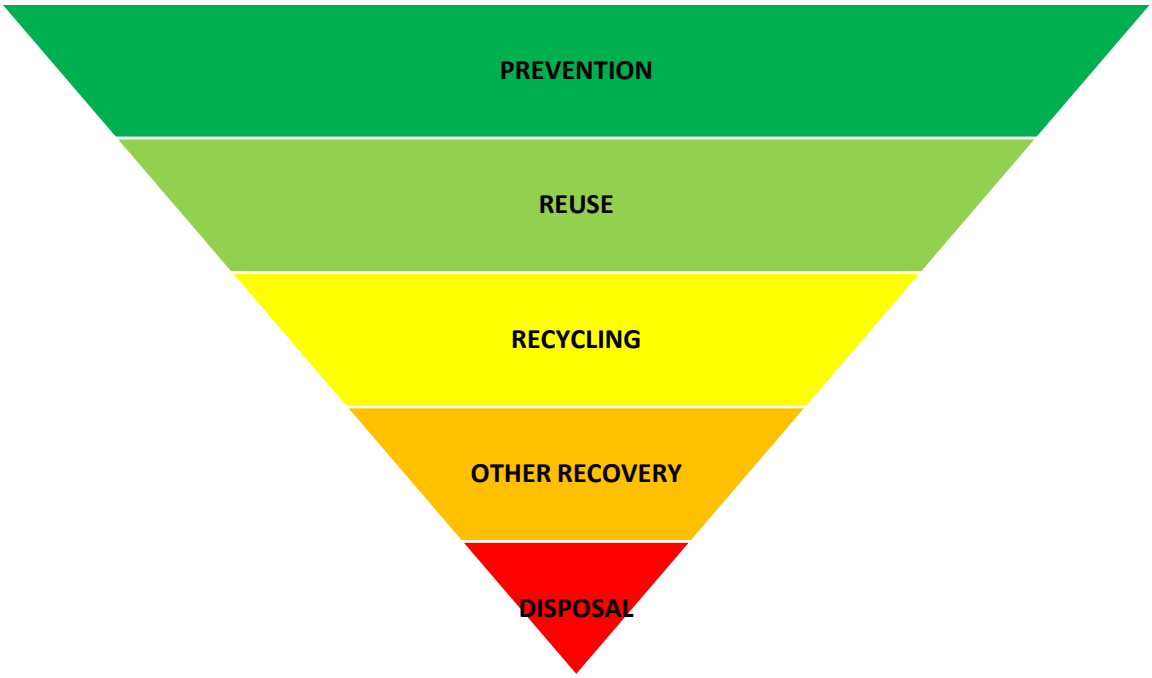

Figure 4.1 Waste Hierarchy

In applying this hierarchy, technical and economic feasibility and overall environmental impacts will be taken into account.

Prevention means reducing the quantities, volumes and hazardousness of waste produced with the aim of reducing the consumption of natural resources and induced pollution. It also allows to reduce the impacts and costs related to transport, recovery and possible landfill.
Source reduction is the most effective approach and will be achieved through a variety of means, including:

- inventory management (e.g. purchasing in quantities that minimize waste);
- substitution of chemicals and raw materials with less hazardous materials;
- purchasing reusable products and products with minimal packaging;
- installing more efficient equipment or improving the efficiency of existing equipment;
- modifying equipment to facilitate waste recovery and recycling;
- improving maintenance, cleaning and control practices;

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- changes in technology, processes and procedures.

Reuse refers to any operation by which products or components are reused for the same or different purposes for which they were designed, thereby extending their life cycle and delaying their disposal as waste. Repair is often another function of reuse, when durable goods require only minor repairs to return to full function. Reusing materials saves money, energy, and natural resources.

Recycling is any operation of recovery of waste materials to obtain products, materials or substances to be used for their original function or for other purposes.

Recovery refers to the conversion of waste into energy or usable materials (when technically feasible and economically viable, this option should be preferred).

Disposal of waste in landfill should always be considered as the last applicable solution.

4.2 Waste Management Philosophy

- Contractor ensures that it adheres to all applicable laws, as well as Company Instructions, Procedures, and Best Industry Practice/Standards relevant to waste management.
- Waste is managed in order to avoid and reduce its potential to cause harm to health or the environment, and to reduce operating costs and potential future liabilities.
- Contractor promotes at all times waste minimization activities and programs which are based on avoidance, reduction, reuse, recycling and regular production control over waste generation, handling, storage, and placement.
- Persons involved in hazardous waste management should be adequately trained to perform hazardous waste management activities.
- Records keeping and reporting shall be performed on a regular basis, as required by the applicable law and Company/Contractor requirements.
- Burning or burying of waste on site will be strictly forbidden.
- The WMP should be read in conjunction with the TCF & POA Demolition CEMP [Ref 4], the Dust Management Plan [Ref 5] and the Construction Traffic Management Plan [Ref 9].
- All relevant permits relating to soil management and waste are detailed below in Table 4.1.

Table 4.1 Waste Consents and Permits

Licenses / Consents / Permits	Authority	Reference Number	Relevant Section (for conditions)	Responsibility
Contaminated Land Scheme approval	FCC Planning Dept.	TBC	TBC	Company
Environmental Permit - Waste (Wales) - PoA	NRW	TBC	TBC	Principal Contractor
Waste Carriers Licence - PoA	NRW	TBC	TBC	Principal Contractor

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5.0 WASTE MANAGEMENT PLAN

During the Demolition Phase all site waste will be managed through its life cycle by the Subcontractor. The Contractor will put in place specific procedures to ensure the Subcontractors segregates, stores, transports and dispose of waste correctly, and are appropriately licenced and qualified to do this.
The Contractor will regularly monitor and review waste management compliance and keep a record of all waste removed from site by the Subcontractors and keep the Waste Transferer Notes (WTN) and a Hazardous Waste Consignment note.

The Subcontractor shall undertake the storage, collection, removal, transport and disposal of all waste in strict compliance with and with full understanding of relevant UK legislation.

The Subcontractor shall be registered with Environment Agency (EA) and other relevant regulatory bodies as appropriate for waste transportation, carrier, broker and dealer. The Subcontractor shall provide the Company Representative with a copy of the certificate evidencing the Subcontractor's registration by the EA or respective governing body as appropriate waste carrier, broker and dealer. A copy of all the above documentation shall accompany each waste load during collection, transit and disposal. If required, the documentation shall be available for inspection by a duty authorised officer during the transportation of the waste.

Premises used by the Subcontractor for the transfer, storage and disposal of waste shall be registered with Environment Agency and other relevant regulatory bodies. The Subcontractor shall undertake the collection, dismantling, processing, storage and disposal of all waste in strict compliance with the conditions of the registration for that premises and with full understanding of relevant UK legislation. The Subcontractor shall provide the Company Representative with a copy of the certificate evidencing the Subcontractor's registration by the Environment Agency or respective governing body for premises used for transfer, storage and disposal of waste. If required, the documentation shall be available for inspection by a duly authorised officer during the transportation of the waste.

Wastes transportation shall be carried out only by trucks with all required environmental authorizations.
Final disposal site should be preferably at no more than 250km from the selected offloading area/dismantling yard. The subcontractor in its WMP should list the plants where intend to dispose the waste.
The Subcontractor shall be responsible for ensuring that each waste load is collected and for signing relevant documentation and Consignment Note/Transfer Note (e.g. waste manifest), providing a copy to Contractor and to the Company Representative for Company's records.

The Subcontractor shall obtain all necessary licences, permits and inspection certificates that are or may be required for all plant, skips/containers and associated lifting equipment. This shall be the responsibility and to the cost of Subcontractor.

5.1 Project Details

Table 5.1 Project Details

Particular	Detail
Project Name	LIVERPOOL BAY DECOMMISSIONING PHASE 1 – WP3
Address and Telephone number of site office	
Contract Start Date	27th May 2025
Contract Completion Date	3rd November 2026
Duration (weeks)	66

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5.2 Roles and Responsibilities

During the execution of the activities foreseen by the Project, the Contractor/Subcontractor:

- will carry out its activities in accordance with the applicable national legislation, its own and the Company's standards, the Environmental Statement (attached to the TCPA) and the Register of Environmental Actions and Commitments (REAC) and international best practices;
- will be responsible for the environmental impacts resulting from its activities and operations and for implementing all measures necessary to avoid or, if not possible, reduce and mitigate them, in accordance with Contractual requirements;
- will react promptly to accidental events for which it is responsible in order to mitigate the resulting impacts as much as possible;
- will implement this WMP and all identified mitigation and monitoring measures and operational control actions;
- will be responsible for avoiding or minimising the generation of hazardous and non-hazardous waste materials and reducing their harmfulness as much as possible.

Line management, from the Project Director through every level of supervisor, foreman and employee is responsible and accountable for waste management.
The most important Project Functions, responsible for development, implementation and monitoring of the WMP are identified and described in the following sections.

5.2.1 Project Director/Project Manager

The Project Director (PD) / Project Manager (PM) has overall responsibility to ensure that the Project Environmental Management System (EMS) is developed, implemented, monitored and effective, and will allocate adequate funds and human resources for development, implementation and monitoring of this document and ensure that all waste management preparations required for the particular construction phase have been carried out prior to its starting.
The Project Director (PD) / Project Manager (PM):

- supervises compliance with regulatory requirements and adherence to applicable standards and procedures to which the Subcontractor has committed to adhere;
- approves this document and ensures its application on Site with the support of the Project HSE Manager and the Project Environmental Manager;
- ensures the availability of adequate funds and human resources for the implementation of this document;
- defines the Project strategies in relation to the waste management area, supervising the planning and scheduling of activities;
- supports environmental initiatives and awareness campaigns on waste.

5.2.2 Project HSE Manager

The Project HSE Manager (PHSEM):

- ensures the development of the WMP through the Environmental Manager;
- coordinates the waste management activities carried out by the various Project functions and ensures that the Environmental Manager effectively implements such coordination;
- ensures support to the PM in relations with the Client and with the Authorities responsible for waste matters;
- monitors the implementation and performance of the WMP in all phases, areas and activities of the Project;
- report findings to the PD / PM and Area HSE Manager;

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- show personal commitment on waste management related objectives and targets;
- discusses with Management the training and information needs of the workforce;
- informs about any applicable contractual/legal changes so as to keep the requirements updated.

5.2.3 Environmental Manager

The Environmental Manager (EM) reports to PHSEM and shall have technical skills and proved experience to ensure correct development, management and improvement of Project EMS throughout the engineering and development phases of the Project as well as for coordination of the Project Environmental Team.
The EM shall:

- be responsible for ensuring that the WMP is developed on time and in accordance with applicable national legislation, current permits and international best practices;
- provide waste support and advice to the PD / PM and PHSEM;
- ensure necessary review and updating of this document;
- ensure that the waste management requirements are identified and satisfactory managed in day-to-day activities;
- ensure that proper knowledge is provided to all applicable employees and parties with regard to waste management, including the Subcontractors;
- ensure that suitable induction and trainings on waste management are identified, developed and delivered;
- ensure that any corrective actions are correctly identified and implemented;
- ensure timely development and submission of environmental reports towards the Company and Local Authorities (if needed);
- identify and develop environmental specific campaigns in order to raise awareness on waste issues;
- carry out analysis of the environmental data and make necessary suggestions for improvement;
- develop environmental incident management procedures and spill response plans to ensure quick and effective response in case of an environmental incident;
- plan and implement environmental emergency response exercises;
- identify spill response needs in terms of personnel and equipment;
- participate in environmental incident investigation;
- perform audits and regular inspections of Waste Management Contractors (WMCs) and their waste facilities to ensure they are compliant;
- ensure the clear and complete traceability of all waste fluxes.

5.2.4 Construction Manager

With the support of PHSEM and EM, the Construction Manager (CM) is responsible for:

- ensure that the planning and programming of the Project take into account the aspects of waste management, coordinating to this end with the other organizations and functions involved in the implementation of the Project and ensuring the most appropriate solutions;
- ensure the coordination of waste management activities with the other Project plans and programs, the General and Executive Plans of demolition/construction, defining the demolition/construction methods, logistics, activity programming, tools and control methods;
- participate, as far as is competent and in conjunction with PHSEM, in the development, updating and adaptation (if necessary) of the WMP.

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5.2.5 Field Environmental Manager

The Field EM supports the EM in implementation and monitoring activities and is responsible for the operational control of environmental aspects and waste management related obligations during the execution of the Project.
The Field EM shall:

- supervise and verify the correctness of the methods of implementation of this document and in general of waste management;
- develop and update the WMP in relation to possible legislative changes or operational activities;
- ensure that garbage identification placards are properly displayed according to the regulations;
- provide information and adequate training to the personnel involved in waste management, with the support from EM and PHSEM;
- ensure that all personnel are aware of the waste management strategy and comply with it;
- review waste management practices and recommend improvements, if necessary;
- support the EM in implementation of waste tracking and reporting process;
- ensure the qualification of the set of authorization processes relating to HSE areas required for the specific plant (e.g. water discharges, waste, etc.) and responsibilities for their implementation;
- supervise the daily implementation of the waste management requirements identified in the WMP;
- plan and carry out periodic inspections and audits to verify compliance with the waste management requirements foreseen by the project;
- plan and implement environmental emergency response exercises;
- participate in the analysis of the causes of any incidents and ensure the collection of data;
- keep all documents relating to waste management archived, organised and available for reporting and audit;
- identify and develop specific environmental campaigns to raise awareness on waste issues (e.g. European Week for Waste Reduction – EWWR);
- carry out environmental data analysis and formulate necessary improvement proposals;
- ensure control over the correct compilation of waste management documentation in compliance with current legislation;
- ensure clear and complete traceability of all waste flows.

Each enterprise that is configured as a Waste Producer will have a figure in its staff who manages the aspects listed above. The Contractor's Field EM will carry out, if necessary, support, training and control actions towards the Subcontractors's Field EM and will verify the compatibility of the plans of the Subcontractors with this WMP.

5.2.6 Workers

All workers involved in the Project shall:

- work according to the instructions of their supervisors and always comply with rules, procedures and good work practices regarding waste management;
- immediately report to their supervisor all acts and conditions that could have a negative impact on environment;
- attend environmental inductions and trainings;
- handle waste appropriately and dispose waste only in appropriate labelled container provided for it;
- participate in all waste management programs (waste reduction, recycling, segregation, reuse etc.) and in the various awareness-raising initiatives.

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5.2.7 Subcontractors

Each Subcontractor is to be considered the producer (originator) of its own waste (residues deriving from the maintenance and use of its own vehicles, installations, equipment, devices, etc.) and is responsible for managing it in compliance with the applicable national legislation, Company standards, the Environmental Statement (attached to the TCPA) and the REAC and international best practices as captured within this document.
The Contractor is therefore not considered a producer of waste produced by Subcontractors during the Demolition Phase, but acts as a guarantor towards the Company for the correct management of all waste produced by them.
Subcontractors are responsible to Contractor for respecting the provisions of this document and are subject to Contractor's supervision.
The Subcontractors will also be responsible to provide required information and data on waste management to Contractor in order to support its environmental reporting activities.

5.3 Waste Segregation, Storage and Handling

All waste produced during the demolition works will be segregated at source and stored in appropriately labelled skips / other containers. The segregation of different waste streams is a pre-requisite for implementing good waste management practices. The principles of segregation apply to the collection, transport, storage, and reuse/recycling/disposal of waste.
Mixing waste is prohibited and different waste category items shall be properly segregated. Hazardous waste shall not be mixed with non-hazardous waste or materials, different types (categories) of hazardous waste with each other, or waste oils with different characteristics.
Waste that cannot be identified will be presumed to be Hazardous.
The Subcontractor shall use reasonable skill and judgement in endorsing the description/classification.

Any items suitable for recycle/re-use/re-sale shall be clearly identified. Waste minimization should be considered throughout the decommissioning project from design through to completion.
Reuse is dependent on identification of appropriate reuse application and reliant on approval. Verification and recertification may be required.

The European Community (EC) Directive 2008/98/EC (Waste Framework Directive) on waste hierarchy principles shall be adhered to, at all times.
In line with the most up to date guidance in the UK particular attention shall be given to the re-use of items (re-use managed by Company).
All materials and waste shall be appropriately recorded, tracked and, where required, reported.
All regulatory and internal waste reporting requirements will be undertaken, and records shall be appropriately maintained for traceability and auditing.

Once all parts are dismantled, produced materials shall be treated and segregated as foreseen for a typical disposal process. Materials suitable for recycling shall be treated as such. Once ready all material will be transported to a dedicated recycling/disposal facilities with suitable transportation means (trucks, barge, etc.).
Normally, decommissioned and removed equipment shall be managed as scrap; however, a check shall be made in order to determine if they are marketable or reusable (e.g. presence of NORM material etc…).
Not contaminated metal and alloy materials arising from mechanical dismantling activities shall be sorted for their sale as scrap. Where practicable and if defined by Subcontractor Design, during demolition operations, the generated scrap metal will undergo size reduction processing to enable it to be easily loaded and transported. All scrap requiring further processing will be taken to the area previously approved as the "processing area".

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Suitable containers shall be used to collect the wastes (e.g. skips, bins or drums), that have suitable bund (as required). The containers shall be closed and clearly labelled. The containers shall be regularly emptied and suitable housekeeping measures shall be adopted to prevent nuisance from insects, vermin or scavenging. It is a requirement that correctly categorised waste is stored, packaged and labelled appropriately. For this SoW there are currently six types of receptacles into which wastes can be stored, these are:

- Waste cubes
- Cargo containers
- Drums
- Compactor
- Clinical waste bins
- Recycling Bins

All containers, bins, etc. will be labelled with duplicate language, if required.

Certain wastes have special storage requirements, for example batteries, fluorescent tubes and oily rags/filters. Dangerous substances should be separated or segregated according to their hazard classification.

Informing posters will be implemented describing the specific waste types characteristics in order to allow an appropriated waste qualification.

5.4 Waste Controls

Control measures detailed within the REAC [Ref 2] to manage waste from demolition activities are listed below in Table 5.2.

Table 5.2 Waste Specific Environmental Actions and Commitments

Action/Commitment	REAC Reference
There will be no bonfires or burning of waste materials.	T-AQ-035
The Construction Contractor will ensure that the application of circular economy principles will be followed, as implemented in the detailed CEMP, including: • Design solutions to prevent the production of waste where feasible, and to send the waste produced for recovery where possible; • Considering all phases of construction, operation and decommissioning in a lifecycle approach; and • Identification of resource streams that might be considered by-products (i.e. not wastes, as per applicable legislation) and reused or recycled.	T-MW-001
The Waste Management Plan, which will be produced by the Construction Contractor(s), will adhere to all relevant legislation and the Applicant's waste management procedures including technical guidance note (AMTE TG 010) as detailed in the Applicant's policy.	T-MW-002
Waste storage areas will be incorporated into the design with waste segregation measures put in place by the Construction Contractor.	T-MW-003
The Construction Contractor will implement, and follow guidance within, the Materials Management Plan (MMP) in accordance with the CL:AIRE Definition of Waste: Code of Practice.	T-MW-005
Engage early with Construction Contractors to identify possible enhancement and mitigation measures to identify opportunities to further reduce any waste through collaboration and regional synergies.	T-MW-006
Construction materials will be sourced from local suppliers and local waste disposal facilities will be used where available and practicable to minimise the distance materials are transported from source to Site and from Site to disposal.	T-GG-005
Avoid disposal of construction waste to landfill, maximising recycling and reuse of waste where possible.	T-GG-006

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Action/Commitment	REAC Reference
Any waste materials generated as a result of the TCPA Proposed Development will be disposed of satisfactorily by registered waste carriers and in accordance with Section 34 of the Environmental Protection Act 1990 and NRW relevant guidance on waste management. Uncontrolled disposal or discharge of waste is strictly forbidden, and compliance of all activities related to the management of waste with all existing local laws and regulations shall be assessed and assured by the subsidiary.	T-LS-003
Earthworks will be completed in accordance with a Contaminated Land: Applications in Real Environments (CL:AIRE) compliant Materials Management Plan (MMP) to ensure re-used material does not present a risk to human health or the environment and complies with UK waste legislation regulations. An earthworks specification will be produced that will include protocols for testing and limiting values to ensure that imported materials are suitable for their intended use in terms of their chemical quality.	T-LS-005
Waste fuels and other fluid contaminants will be collected in leak-proof containers prior to removal from the construction area to an approved recycling processing facility.	T-WR-016

The following measures detailed in Table 5.3 shall be carried out on site to ensure correct waste management and compliance with applicable legislation and the project REAC.

Table 5.3 Waste Control Measures and Responsibilities

Task	Responsibility
Ensure all waste disposal is arranged via the Principal Contractor's Waste Subcontractor.	Field EM / CM
Plan to segregate waste as far as practicable.	Subcontractor
Carry out Duty of Care audits on waste contractor facilities annually, as a minimum, or as new contracts/sites are set up.	Field EM / CM
Where practicable, when ordering materials, contract buyers will introduce a 'take-back policy' on suppliers, so where possible, no delivery will leave the site without taking associated waste and packaging with them.	Field EM / CM / Procurement
Documentation:	
Ensure that copies of the following are retained on site: • All relevant Waste Carriers Registration Certificates and associated NRW validity checks. • All relevant Waste Management Licences / Exemption Certificates and associated NRW validity checks. • WTNs and Consignment Notes. • Site WMP / Hazardous Waste Register. A Waste Manifest Register shall be generated and sent to Company and to any other party acting on its behalf in relation to the demolition activities – Company is responsible for submitting EEMS returns to BEIS.	Field EM / CM / Subcontractor / Company
Site Controls:	
Do not accept damaged skips / waste containers on to site.	Field EM / CM / Subcontractor
Locate skips/ waste containers away from drains, watercourses and heavily trafficked areas.	Field EM / CM / Subcontractor
Locate skips/ waste containers on hardstanding if possible.	Field EM / CM / Subcontractor
Ensure all waste is stored securely so that it cannot escape (by wind/ vermin).	Field EM / CM / Subcontractor
Ensure all hazardous waste containers are covered.	Field EM / CM / Subcontractor
Ensure all skips and bins are labelled with their contents.	Field EM / CM / Subcontractor

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Task	Responsibility
Remove waste at frequent intervals to ensure the site is kept clean and tidy.	Field EM / CM / Subcontractor
Place the correct waste in the correct skip.	All staff (Subcontractor included)
Report skips that are leaking or overfull to your supervisor.	All staff (Subcontractor included)
Eliminate unnecessary wastage by: • Storing material neatly on flat solid ground to avoid damage and loss. • Keeping materials in their packaging for as long as possible to protect them from damage. • Ensuring existing material containers are empty before opening new ones. • Keeping significant off-cuts for use elsewhere.	Field EM / CM / Subcontractor

5.5 Waste Exemptions

Where applicable, the Contractor shall utilise the following:

- Exemptions (Non-Waste Framework Directive - NWFD):
  - NFWD 3 – Temporary storage of waste as a place controlled by the producer
- Exemptions (Waste); and
  - U1 – Use of Waste in Construction
  - T7 – Treating waste such as concrete by crushing for reuse
- CL:AIRE

Please refer to the MMP [Ref 6] for WP3 for any waste exemptions which may be in place for the SoW.

5.6 Training and Competence

The Field EM or equivalent qualified person will have sufficient experience and knowledge on utilising waste companies and management of waste on site. The Field EM will work in close liaison with the central Procurement Team for waste supplier management as well as the Project Environmental Team to ensure documentation is compliant with legal requirements. The Field EM shall also work in liaison with the project team to establish opportunities for waste reduction.

Waste training will be provided to all staff on this contract will include:

- Contract-specific requirements for waste management/ waste targets will be included in the Site Induction given to all Staff, Operatives and Subcontractors;
- Toolbox Talks including but not limited to:
  - Waste Hierarchy.
  - Segregation of Waste.
  - Waste Management.
  - More detailed training for staff or subcontractors with specific waste responsibilities (such as site Waste Reps) will take place and will include as a minimum waste documentation training and waste legislation training.
  - Waste

In addition, suitable notice on environmental matters will be displayed on the sites in order to provide a continuous awareness on waste management procedures throughout the Project.

5.7 Waste Carriers

Waste subcontractors will be appointed in accordance with the Contractor's Supply Chain checks, which includes environmental criteria, and will be required to work in accordance with the Contract Environmental Management System and Method Statements.

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The validity of a waste carrier's licence and whether the receiving premises are licenced or exempt will be checked with the Regulator prior to waste being allowed off site. The licences will be checked on a monthly basis and documented on site.

Waste Duty of Care checks will be carried out on a monthly basis as part of ongoing site inspections. These checks will include a review of waste documentation (permits, licences, waste transfer notes and hazardous waste consignment notes)

5.8 Waste Forecast

A forecast of waste quantities and opportunities to apply the waste hierarchy will be identified prior to works commencing to ensure accurate contract waste data is readily available. Table 5.4 details anticipated waste quantities for the demolition scope. Waste codes 17 04 05 - 17 04 07 - 17 01 01 may be not classified as a waste if not contaminated, reuse/recycling is foreseen and requirement from Section 5.5 applies.

Table 5.4 Anticipated Waste Types and Estimated Quantities for Demolition Scope

Waste	Waste Code	Estimate Quantity (ton)	Recovery or Disposal Code
Iron and Steel (including their alloys)			
Iron and Steel / Stainless Steel / Steel Alloys	17 04 05	6,519.0	R4
Mixed Metals	17 04 07	19.8	R4
Non-Ferrous Materials			
Components not otherwise specified	16 01 22	0.7	D1
Wood	17 02 01	16.0	R3
Glass	17 02 02	0.9	R5
Plastic	17 02 03	6.2	R3/R5
Aluminium	17 04 02	23.2	R4
Concrete			
Concrete	17 01 01	23,128.0	R5
NORM / Hazardous			
Gases in pressure containers (including halons) containing hazardous substances	16 05 04*	0.5	TBC
(Batteries and Accumulators) Alkaline batteries (except 16 06 03)	16 06 04	50.1	TBC
Cables (Copper / Steel / PVC)	17 04 11	476.6	R4 + R5
Insulation materials other than those mentioned in 17 06 01 and 17 06 03	17 06 04	139.7	D1
Electrical and Electronic Equipment			
(Wastes from electrical and electronic equipment) Discarded equipment containing or contaminated by PCBs at a concentration of equal to or greater than 50 mg/kg (0.005%)	16 02 09	380.0	R4 + R5
(Wastes from electrical and electronic equipment) Discarded equipment containing chlorofluorocarbons, HCFC, HFC	16 02 11	1.3	R4 + R5
(Wastes from electrical and electronic equipment) Light Fittings [LED, halogen and incandescent (Metal / Plastic)]	16 02 14	63.9	R4 + R5

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Waste	Waste Code	Estimate Quantity (ton)	Recovery or Disposal Code
(Municipal wastes - Separately collected fractions) WEEE - Discarded electrical and electronic equipment containing NON-hazardous components - Mixed Items	20 01 36	175.8	R4 + R5
Other			
Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	17 09 04	1,012.0	D1

5.9 Recording Waste Movements

All waste removed from site will be covered by a WTN or Hazardous Waste Consignment Note, containing all the legally required information.

Most inert and non-hazardous waste will be transferred under a single movement 'Waste Transfer Note' but 'Season Tickets' may be used where there are multiple movements of the same waste to the same destination.

Hazardous wastes will be transferred using a 'Hazardous Waste Consignment Note'. WTNs will be kept for two years and Hazardous Waste Consignment Notes for three years. Quarterly Waste Report's will be obtained from waste Contractors for all hazardous waste removals from site and will be held on file for a minimum of three years.

To ensure validity and assurance that waste are being sent to the designated waste transfer facility, the contractor will carry out periodic compliance checks. These checks will include:

- Reviewing waste transfer documentation (e.g., waste transfer notes, consignment notes).
- Verifying the waste carrier's registration and licensing status.
- Confirming that the receiving facility is correctly licensed and authorized to accept the type of waste being transferred.

The Subcontractor shall sample and analyse all liquid waste streams and any waste streams which might contain substances which would render them as being categorised as Hazardous before each waste stream is first removed from the Company's site. Analytical results will be made available to the Company together with the Subcontractor's recommendations for safe disposal and classification of each waste stream.

The actual waste arisings, disposal routes, percentages recycled and costs will be reviewed every calendar quarter and recorded.

5.10 Performance Review

The Contractor shall send an accurate monthly summary of waste data to the Company's HSE team by the 10th of each month, reporting waste and any other material (whatever classified) removed from project sites during the previous calendar month. The Contractor shall ensure that the direct transfer of waste is undertaken in accordance with the applicable regulations at all times.
Typical Waste Reporting forms are given in Attachment 1.

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6.0 ATTACHMENT 1 – TYPICAL WASTE REPORTING

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7.0 ATTACHMENT 2 – LAYOUT OF WASTE LAYDOWN AREAS

Note: The layout of the individual areas may be subject to changes during the execution phase.

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