

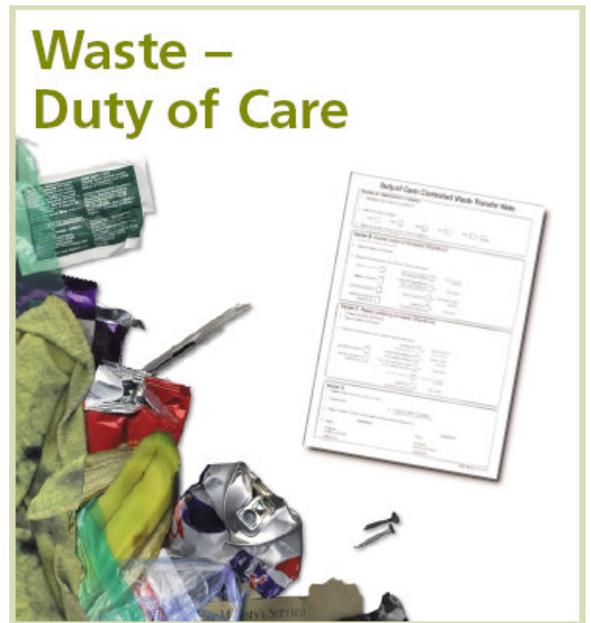
Waste Duty of Care: Key Requirements

As a result of internal environmental audits conducted across the Group opportunities have been identified to improve our performance related to key duty-of-care waste legislation. One of these opportunities is to remind staff about the key requirements of waste duty-of-care legislation.

What are the key requirements?

To ensure conformance to key duty-of-care waste legislation, all sites and / or permanent offices should ensure that:

- Wastes are stored so as to avoid polluting the external environment e.g., store wastes within good quality within skips, bulk containers or drums
- A Waste Transfer Note (WTN) is fully completed and signed for all non-hazardous wastes removed from site. Due to the poor quality of waste contractors' WTNs, many of which are legally non-compliant, our sites and offices should use the GT WTN. Copies of WTNs must be retained for two years
- A licensed waste carrier is used to transport our wastes – a copy of their registration should be obtained, checked and verified
- A hazardous (or Special in Scotland) waste consignment note is fully completed and signed for all hazardous (or Special in Scotland) wastes sent for off-site disposal. Copies of consignment notes should be retained for three years
- Waste recycling / disposal sites to which wastes are being sent hold valid Environmental Permits / Waste Management Licences or Exemption
- Waste recycling / disposal sites are authorised to accept the waste types being sent to them by site teams obtaining and reviewing the conditions of their Permits / Licences or Exemptions.



Does this apply to subcontractors waste?

Yes. All waste removed from site is required to comply with these requirements. Subcontractors should provide copies of completed WTNs, waste carrier registrations and copies of environmental Permits / Licences or Exemptions. GT WTNs should also be completed for the removal of waste from site under the control of subcontractors.

Are there any regional differences?

Yes. There are a few notable differences in duty-of-care waste legislation between England, Wales and Scotland; namely, all sites and / or permanent offices should ensure that:

- They are registered with the Environment Agency in England and Wales if more than 500kgs of hazardous waste is produced in a year. *(Note: These need to be renewed on an annual basis)*
- Copies of hazardous waste returns are obtained from the waste contractor in England and Wales on a quarterly basis *(Note: These returns contain information on the quantity, nature, origin, destination, frequency of collection, mode of transport, waste carrier and the disposal or recovery operation applied)*
- The Scottish Environment Protection Agency (SEPA) is given at least 72 hours pre-notification of a shipment of special waste from site / office.

If you require further information please contact your regional or framework Environmental Advisor.

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