

Wylfa Newydd Project Site Preparation and Clearance Application

Environmental Management Plan Management of Materials and Waste Procedure



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1 Introduction

Purpose and Applicability

- 1.1 The purpose of this procedure is to provide direction for all Horizon staff and persons working on our behalf (e.g. Contractors, subcontractors, suppliers) for the management of conventional (non-radioactive) materials and non-hazardous (including inert) and hazardous waste generated at Horizon sites and offices. This procedure supports the following:
- identification of waste regulatory requirements related to project and office activities;
 - identification of guidance e.g. WRAP good-to-best practice waste minimisation and management (see WRAP) to help minimise environmental impacts;
 - identification of waste impacts related to project and office activities; and
 - identification and development of management and mitigation measures to minimise or eliminate identified waste impacts, wherever practicable.
- 1.2 This procedure is applicable to all persons who are responsible for managing or delivering projects for Horizon Nuclear Power, including external parties acting on behalf of the Company. It also applies to office staff who are responsible for procuring and managing waste management services.

Scope

- 1.3 The scope of this document extends to all Horizon sites and offices including Wylfa Newydd, Oldbury and Gloucester headquarters where Horizon or those working on our behalf generate materials and waste or who procure waste services.
- 1.4 It extends to all projects, activities, works and services including the transfer or consignment of waste, by registered carriers and to appropriately licensed facilities. It excludes radioactive wastes, but will include material or waste which is 'out of scope' of, or exempt from, radioactive substances regulations.

Terms and Definitions

- 1.5 Table 1.1 provides a summary of commonly used waste terms and definitions. The table is not exhaustive; therefore in the case that Horizon staff or persons working on their behalf (e.g. Contractors) encounter a waste term not detailed below, they should contact the Site Waste Officer or the Head of Environment and Waste in order to get a clear definition.

Table 1.1 Terms and Definitions

Term	Definition
CL:AIRE	Contaminated land: applications in real environments
Consignment Note	Details time and date of a hazardous waste transfer, as well as a description of the waste, and details of the waste producer, waste carrier and destination of the waste for treatment or disposal. It must be signed by both parties upon transfer of hazardous waste.
Controlled Waste	Controlled waste is defined in the Environment Protection Act 1990 and the Controlled Waste Regulations 1992 as household, industrial and commercial waste or any such waste that require a waste management licence for treatment, transfer or disposal.
Conventional Materials and Waste Management Strategy	High-level strategic planning of materials and waste management for both Wylfa Newydd and Oldbury-on-Severn nuclear new build projects, including Materials Management Plans, Site Waste Management Plan and Project Waste Management Plans.
Disposal	Any operation which is not recovery including disposal to landfill, combustion of waste and under EPA90 disposal for recycling.
Environmental permit or exemption	A facility must have a permit or exemption to store, treat or use waste legally. Permits and exemptions are issued by the Environment Agency (EA), Natural Resources Wales (NRW)
EWC code	European Waste Catalogue code must be shown on any waste transfer note or consignment note to describe the waste.
Exempt Materials and Waste	An article or substance that is radioactive or contaminated under the Environmental Permitting Regulations 2010 as amended by the Environmental Permitting (England and Wales) (Amendment) Regulations 2011 because it contains levels of specified radionuclides above out of scope limits; but is conditionally exempted from further regulation based on its radioactive properties because it contains levels of specific radionuclides or radioelements as appropriate below the exemption limits [RD1].
Hazardous Waste	A controlled waste which has properties that may be harmful to human health or the environment. There are regulations in place to detail the criteria for identification of Hazardous Waste. Examples include asbestos, some treated woods and fluorescent tubes.

Term	Definition
Hazardous waste producer registration number	When hazardous waste is removed from site a consignment note (explained below) will accompany the waste. One of the pieces of information required on the consignment note for Wales is the hazardous waste producer registration number. The number for Wylfa is OKA405 which is renewed annually. A hazardous waste producer registration number is not required in England.
HNP / Horizon	Horizon Nuclear Power Wylfa Limited
Inert waste	Waste that does not undergo any significant physical, chemical or biological transformations; does not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health; and its total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater. Examples include concrete, bricks or sub soil.
Non-hazardous waste	Waste that is neither inert nor hazardous. Examples include paper, plastic, metal, wood and food waste.
Out of Scope Materials and Waste	An article or substance that is not radioactive for the purposes of regulation under the Environmental Permitting Regulations 2010 as amended by the Environmental Permitting (England and Wales) (Amendment) Regulations 2011 [RD1].
Preparing for Reuse	Checking, cleaning, repairing or recovery operations, by which products or components of products that have become waste are prepared so that they can be reused without any other pre-processing, for example removing a motor from a piece of machinery where the machinery is damaged beyond repair but the motor still works.
Pre-treatment	Producers of waste should ensure that any waste destined for disposal at landfill must be pre-treated – segregating these materials from the residual waste at source would be a means of pre-treatment.
Prevention	Measures taken before a material or product has become waste, that reduce: <ul style="list-style-type: none"> • the quantity of waste, including through the reuse of products or the extension of the life of products • the adverse impacts of the generated waste on the environment and human health • the content of harmful substances in materials and products.

Term	Definition
Recovery	Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. For example waste being incinerated to generate power in place of fossil fuels being combusted to produce power.
Recycling	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials. For example, crushing a mixture of bricks, concrete and tiles to produce hardcore.
Registered Carrier	In England and Wales, any person registered with the Environment Agency (EA) or Natural Resources Wales (NRW) to transport waste within Great Britain, including journeys into and out of Great Britain.
Reuse	Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived, for example reusing pallets.
Season Ticket	For repetitive transfers of inert or non-hazardous waste, you can use a 'season ticket', i.e. one transfer note will cover multiple transfers over a given period of time of up to 12 months. However, you can only use a 'season ticket' if the parties involved in each transfer are the same and the description of the waste transferred remains the same.
SIC code	Standard Industry Classification code. A waste transfer note and consignment note both require a SIC code which describes the activities that produced the waste.
SWMP	Site Waste Management Plan. The plan establishing waste management protocols for site waste.
Waste	Is defined in the Waste Framework Directive (European Directive 75/442/EC as amended) as any substance or object the holder discards, intends to discard or is required to discard.
Waste Broker	An establishment or undertaking that arranges on behalf of others the transport, disposal or recovery of controlled waste, but does not hold the waste themselves. For example, they may arrange for it to be recovered, destroyed or disposed of by some other organisation.

Term	Definition
Waste Duty of Care (DoC)	When waste from a site is given to a waste management Contractor - including waste destined for landfill – the producer of the waste has a legal responsibility to ensure the waste management Contractor is authorised to take it and that it's accompanied by a waste transfer note or consignment note. This is known as waste duty of care.
WEEE	Waste Electrical and Electronic Equipment which is waste including all components, subassemblies and consumables which are part of the product at the time of discarding.
Waste Holder	The person or company who has the responsibility for the waste at a particular time. This can be an importer, the producer, the carrier of the waste, or a person who keeps, treats or disposes of the waste.
WMC	Waste Management Company
Waste Producer	Anyone whose activities produce waste, or who carries out pre-processing, mixing or other operations resulting in a change in its nature or composition.
Waste Transfer Note	Details time and date of a waste transfer, as well as a description of the waste, and details of the waste producer, waste carrier and destination of the waste for treatment or disposal. It must be signed by both parties upon transfer of inert and non-hazardous waste.
WRAP	Waste & Resources Action Programme. Achieving good practice Waste Minimisation and Management Guidance for construction clients, design teams and contractors.

Responsible Parties

- 1.6 Management of conventional materials and waste shall be delivered through specific roles and responsibilities within Horizon and across our supply chain.

Parties involved in the process

Table 1.2 Responsible parties

Horizon Responsible Party	Description
Head of Environment and Waste	<ul style="list-style-type: none"> Identifying an appropriate SQEP person as the Site Waste Officer. Identifying an appropriate SQEP person as the Site Environmental Coordinator Ensuring the Site Waste Officer, Site Environmental Coordinator, Site Manager and Head of Permitting are aware of their responsibilities. Reviewing annual waste reports and recommended actions issued by the Site Waste Officer.

Horizon Responsible Party	Description
	<ul style="list-style-type: none"> • Instructing the Head of Permitting to make all necessary arrangements for securing waste permits. • Coordinating engagement with the Regulators regarding waste. • Providing advice on waste minimisation and management in absence of Site Waste Officer or Site Environmental Coordinator. • Approving donations of materials and products given in good faith to charities, organisations and people before the exchange. • Delegating these responsibilities to SQEP staff and/or contractors where required.
Site Manager	<ul style="list-style-type: none"> • Ensuring the relevant information on waste minimisation and management is included in the site induction. • Ensuring the location of materials and waste storage areas are included in the site induction. • Has the authority to stop works undertaken by Horizon or Contractors which do not fulfil the requirements or expectations of Horizon.
Site Waste Officer	<ul style="list-style-type: none"> • Ensuring waste compliance for all activities on site. • Identifying and updating staff, contractors and subcontractors on the location of the Waste Storage Area which may change during the lifetime of the project. • Clearly identifying the location of the Waste Storage Area on the site notice board. • Reporting to Head of Environment and Waste any non-compliance with waste legislation and aiding subsequent investigations. • Ensuring effective application of the Waste Hierarchy, as detailed in <i>Conventional Materials and Waste</i> [RD2]. • Liaising with the designated Facilities Managers and Office Managers (or equivalent persons) in connection with waste minimisation, management and disposal matters. • Ensuring all waste streams are correctly identified & categorised. • Checking compliance of waste carriers and waste management companies being used by contractors and offices. • Ensuring all waste is managed and segregated as defined in the contractors' SWMP using monthly SWMP Reviews. • Ensuring compliance with the waste Duty of Care requirements. • Ensuring any waste treatment activities carried out by the site/business are appropriately authorised by the Environment Agency (EA) or Natural Resources Wales (NRW). • Promoting waste minimisation initiatives. • Checking Contractor licences through the Environment Agency and NRW online public registers. • Maintaining records relating to waste transfer and updating the <i>Waste Management Checklist</i> [RD3] as required. • Completing Quarterly SWMP Report.

Horizon Responsible Party	Description
Site Environmental Coordinator	<ul style="list-style-type: none"> Undertaking the responsibilities of the Site Waste Officer when they are unavailable (leave, sickness etc.).
Head of Permitting	<ul style="list-style-type: none"> Ensuring all relevant waste permits, exemptions or hazardous waste producer registrations are in place, as agreed with the Head of Environment and Waste. Ensuring permits are entered on the master permissions list.
Facilities Manager	<ul style="list-style-type: none"> Procuring waste management services for the office. Reviewing, signing and storing paperwork (e.g. waste transfer notes, hazardous waste consignment notes) for wastes removed from the office, for review by the Site Waste Officer or nominated person e.g. Site Environmental Coordinator. Requesting support from the Head of Environment & Waste for any unfamiliar waste management requirements or requests. Providing waste management services where these are not procured by Horizon.

Parties supporting the process

Table 1.3 Supporting responsible parties

Contractor Responsible Party	Description
Contractors (including subcontractors)	<ul style="list-style-type: none"> Complying with the requirements of this procedure, either through their activities or the activities of others under their control (e.g. subcontractors) that manage materials, generate waste, dispose of waste or arrange for waste to be disposed of. Ensuring waste carriers or waste management companies correctly describe waste. Identifying the most appropriate management route of a particular waste, depending on its characteristics and classification as non-hazardous or hazardous waste and in line with the Horizon Waste Hierarchy. Providing an accurate description of the waste and ensure that it is captured on the waste transfer records. Hazardous waste may be harmful to human health or the environment. If the waste has hazardous properties, it must be treated as hazardous waste. Consulting the European Waste Catalogue (EWC) when classifying the types of waste and using appropriate 6 digit EWC code on transfer or consignment documentation. Where a waste falls under more than one EWC code then the appropriate EWC codes shall be used. Providing information to Horizon on a regular basis, as stipulated in this procedure and contract documentation, to demonstrate compliance with this Procedure and all associated documents. Abiding by all relevant waste legislation and regulation.

Contractor Responsible Party	Description
	<ul style="list-style-type: none"> • Providing a list of waste carriers and waste management companies responsible for wastes. • Complying with the WEEE Regulations for damaged or failed electrical or electronic equipment. • Taking a proportionate and scalable approach to managing office waste. • Liaising with the designated Facilities Manager, Property Manager or equivalent person in connection with waste minimisation, management and disposal. • Checking and recording progress against waste minimisation activities. • Maintaining records relating to waste transfer or waste consignment and updating the <i>Waste Management Checklist</i> [RD3] as required and provide this to Horizon on request. • Producing a Materials Management Plan (MMP) for their project using the CL:AIRE definition of waste code of practice MMP template, and procuring the services of a CL:AIRE Qualified Person to approve and verify the MMP. • Producing a Site Waste Management Plan (SWMP) or Project Waste Management Plan (PWMP) for their project and have it accepted by the Site Waste Officer before works begin on site. • Providing Horizon Site Waste Officer with a monthly summary of waste types and volumes including EWC codes and allow Horizon to inspect all waste transfer and consignment notes. • Closing-out the SWMP/PWMP on completion of the project by surmising the difference in forecast and actual waste and providing explanations for the difference and lessons learnt.

Example process flow diagrams

- 1.7 The level of involvement of responsible parties (both Horizon and Contractor) in waste management activities, will be dependent on the types of waste and where the waste is generated. Figures 1.1 & 1.2 provide generic flow charts of the differences between (1) office waste and (2) Contractor waste, and the level of involvement of those concerned. These are generic examples by way of explanation, but other waste flows especially during operation will require further flow charts.
- 1.8 Figure 1.1 shows the generic flow for office waste at Sunrise House and Wylfa. Waste generated in the office is generally segregated by staff into separate bins which are then collected each day by a cleaning company and stored outside in Eurobins.
- 1.9 The Eurobins are collected by a waste management company on a regular basis and taken to a materials recovery facility or landfill, depending on the nature of the waste. Horizon Facilities Manager procures both of these services to act on our behalf and to manage our waste Duty of Care. Horizon compliance system follows a TM17 (Technical Manual) model, where compliance documentation in digital and hard copy is held in the Facilities Centre at Sunrise House.
- 1.10 Figure 1.2 shows the generic flow for project waste at Wylfa Newydd, which requires each Contractor to prepare a SWMP before works begin. Various types of waste will be

generated by the contractor, their subcontractors and supply chain who may need to undertake a number of waste management activities including segregation, treatment, packaging, storage, transport and disposal.

- 1.11 Some waste activities such as crushing of concrete to reuse on site will be undertaken by subcontractors, whereas specialist activities such as controlled removal of asbestos from buildings will be procured through specialist contractors.
- 1.12 Certain wastes will be segregated on site in separate skips or Eurobins, or stored to one side to be collected at a later date when sufficient numbers have been collated; returnable pallets are a good example of this segregation and storage activity.
- 1.13 Horizon has limited involvement with Contractor waste management, other than regular reviews and reporting of the Site Waste Management Plan.

Figure 1.1 Example office waste management activities and responsible parties

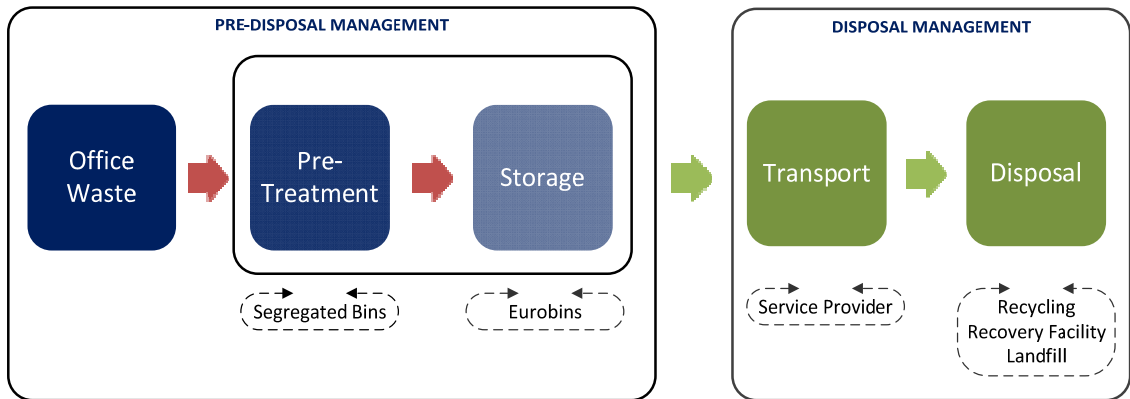
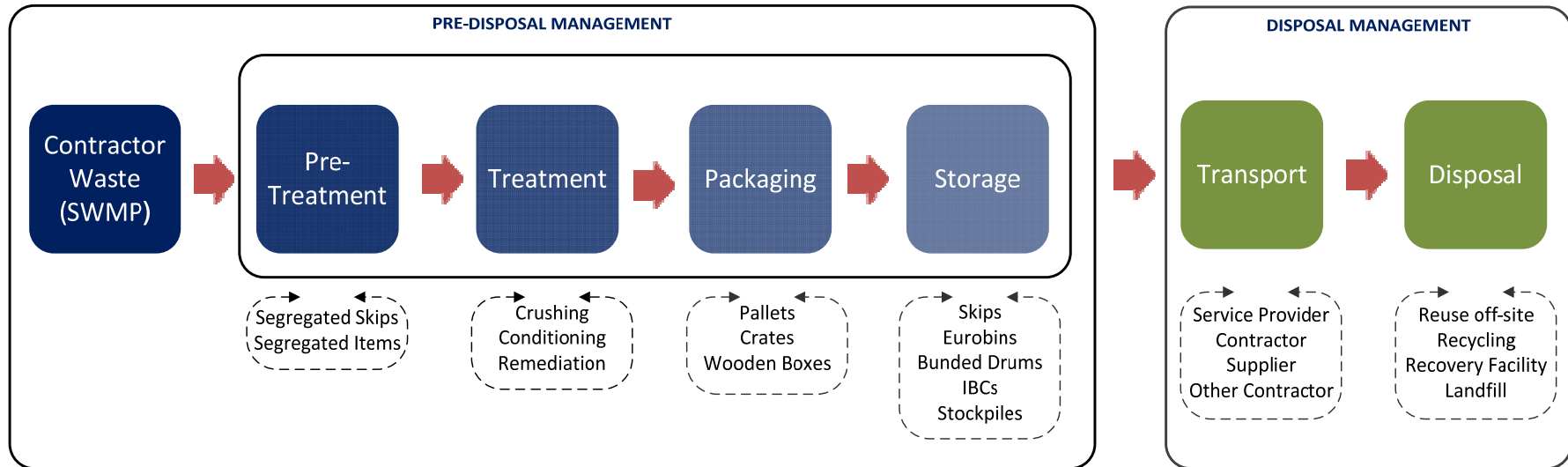


Figure 1.2 Example Contractor waste management activities and responsible parties



2 Materials and Waste Management

Types of Materials

- 2.1 A generic flow diagram of material and waste movements and options for reuse, recycling, etc. is shown in figure 2 of Conventional Materials and Waste [RD2].
- 2.2 The following applies to conventional materials that are acquired from site or wastes that are processed back into materials that are suitable for use (no further processing) and have a certainty of use (specified in planning):
- clean naturally occurring soil and mineral materials including topsoil, sub-soil, clay, parent material and underlying rock, from which constituent parts make up the soil;
 - mineral based dredging (only if appropriate dewatering has taken place);
 - ground based infrastructure that is capable of reuse within earthworks projects, e.g. road base, concrete floors (permitted controls may apply);
 - made Ground consisting of the above materials only, e.g. embankment which is to be removed and is suitable for use without any processing;
 - source segregated aggregate material arising from demolition activities, such as crushed brick and concrete, to be reused on the site of production within earthworks projects or as sub-base or drainage materials;
 - stockpiled excavated materials that include the above; and
 - clays, silts, sands and gravels.

Types of Waste

- 2.3 Materials that are unsuitable for use or that we have no use for, or those that we intend to discard, discard or are required to discard are controlled waste; non-hazardous or hazardous.

Non-Hazardous Waste

- 2.4 Non-hazardous waste (including inert waste, see below) includes a wide range of products and composites that are not hazardous to humans or the environment. Some hazardous waste may be confused for non-hazardous waste and it is important that responsible parties are aware of the differences. For example, engine oil is hazardous whereas edible oil is non-hazardous
- 2.5 Non-hazardous wastes include plastic such as pipes, metal such as re-bar, wood such as dimensional timber, insulation such as fibreglass, PVCu windows and doors, carpets, furniture, kitchen cupboards, bathroom suites and topsoil that is not contaminated. Demolition and site clearance activities will generate a wide range of these wastes which should be segregated wherever practicable.
- 2.6 This waste should be stored in labelled bins or skips in a designated area, and enclosed if it is external to prevent rainwater accumulating and degrading the material. General mixed-waste receptacles or skips can be provided for mixtures of wastes, composites and sweepings, but should be discouraged wherever possible.

Inert Waste

- 2.7 Inert waste is a sub-group of non-hazardous waste that includes a wide range of construction, demolition and some office products including bricks, stones, blocks, concrete, tiles, slate, glass (flat and bottles), uncontaminated subsoil (not topsoil), etc. Inert waste generated by Contractor activities shall be stored in inert skips or in designated material storage area(s). Stone, bricks and concrete should be stored separately from subsoil. This will ensure the site operates within any exemption requirements and for updating the Waste Exemption Tracker [RD4]. Where there is a requirement, inert waste should be processed to WRAP aggregate quality protocol standard, which is not considered waste and will not affect any exemption limit.

Hazardous Waste

- 2.8 Waste is considered to be hazardous if it (or the material it contains) is harmful to humans or the environment including engine oils, fuels, chemicals, contaminated materials, asbestos, some fridges and freezers and some batteries. They can be mirror or absolute depending on the level of contamination. For example asbestos is always absolute hazardous, whereas soils contaminated with asbestos can be mirror hazardous that becomes non-hazardous with appropriate treatment and decontamination.
- 2.9 Hazardous waste has its own waste legislation and regulations to ensure that it is recognised and appropriately treated or disposed. Some hazardous materials, e.g. contaminated soils can be remediated to reduce the hazardous nature and determine the materials suitable for reuse, but this must follow strict guidelines and procedures, often through specialist contractors.
- 2.10 Some hazardous wastes are easily recognised, whereas others are not so well understood. For example most people are aware of asbestos and the need for asbestos surveys for buildings, especially where demolition will occur, but how many would be able to define which types of fridges or freezers contained hazardous materials? Asbestos containing materials (ACMs) are a broad range of products containing asbestos that are hazardous and need appropriate and specialist treatment and handling.
- 2.11 Hazardous waste shall be appropriately identified, managed and stored in designated area(s) in appropriately labelled, enclosed skips or receptacles. They shall be enclosed to prevent pollution from overflow of accumulated rainwater. Hazardous liquid wastes, oils and fuels will require an additional bunded area that is resistant to corrosive chemicals to store the skips/receptacles. Where contaminated materials or hazardous items have been recognised in non-hazardous receptacles, skips or materials storage area(s), it shall be quarantined and stored in the same manner as hazardous waste awaiting remedial action.
- 2.12 Where potential contamination is encountered, works should stop immediately and samples taken by the contractors of the soil or materials to determine if it is hazardous. Where it is determined to be hazardous, it shall be managed accordingly.
- 2.13 In the event that waste is suspected of being radioactive, it shall be left in situ and advice sought immediately from the Corporate Radioactive Waste Adviser (RWA) Body on its management and disposal [RD5] and the Corporate Radiation Protection Adviser (RPA) Body on the associated radiological safety aspects e.g. dose and exposure [RD6].

Waste Electrical and Electronic Equipment (WEEE)

- 2.14 Waste Electrical and Electronic Equipment (WEEE) items are manufactured from a wide range of materials, components, electronics, fluids and gases that may be hazardous. WEEE includes household appliances, information technology, telephones, lighting equipment, electrical tools, monitoring and control instruments, display equipment and appliances containing refrigerants.
- 2.15 Some of these may be hazardous, requiring additional management and treatment as hazardous waste. WEEE items will need specialist treatment at appropriate and approved facilities and should only be landfilled as a last resort, or if required by the WEEE Regulations. WEEE items destined for reuse or recycling by the Contractor or office manager shall be segregated from other wastes and transferred to an appropriate, approved and authorised treatment facility/ approved exporter, arranged by the Contractor, which uses Best Available Treatment Recovery and Recycling Techniques (BATRRRT).
- 2.16 All WEEE must be accompanied by a waste transfer note or hazardous waste consignment note when it is removed from site or offices to an approved waste management facility.

Office Waste

- 2.17 Office waste should be segregated and recycled wherever possible at all our sites. Typically cardboard, paper, newspapers, plastic cups/bottles, plastic pots and tubs, metal food and drink cans, fully discharged aerosol cans, clean foil and glass bottles and jars should go in the recycling bins. Food, cling film, broken glass and packaging contaminated with food should not go in recycling bins. Separate food bins could be provided for uncooked and cooked meat, vegetables and fruit, coffee grounds, tea bags, bread, cakes and dairy products; but not food packaging. General waste bins are provided for other types of waste.
- 2.18 Meeting rooms and offices should have access to separate bins for recycling and for general waste. Additional bins should also be considered in the kitchens and canteens for food waste. Contractors should take a proportionate and scalable approach to managing their office waste, which will be checked periodically by the Horizon Site Waste Officer.
- 2.19 Where waste and recycling receptacles are available, the following shall apply:
- Any large cardboard boxes should be taken directly to the External recycling bins;
 - Broken glass should be carefully wrapped in newspaper and placed directly in the External general waste bins. Note that unbroken glass can go in the recycling bins;
 - Damaged and failed electrical equipment will be collected by the company providing electrical office equipment (such as screens, telephones etc.) as part of their waste electrical and electronic equipment (WEEE) responsibilities;
 - Other electrical waste such as broken kettles, toasters etc. will be stored in a wheellie bin for waste electrical and electronic items and collected by the waste Contractor when it is reported to be damaged or not working;
 - Waste batteries should be deposited in the battery bins;
 - Fluorescent tubes should be collected separately for recycling;
 - Oily waste (used spill kits etc.) should be disposed as hazardous waste;
 - Damaged or out of date PPE should be placed by the recycling bins in bags; and

- Any other items considered to be waste but not shown in any of the sections above should be reported to the Horizon Site Waste Officer.

Waste Classification and Duty of Care

- 2.20 The appropriate management route of a particular waste depends on its classification. The European Waste Catalogue (EWC) categorises waste by industry sector or process, and classifies materials as hazardous, non-hazardous or potentially hazardous according to their physical, chemical and biological properties.
- 2.21 The use of EWC codes is a legal requirement of Waste Duty of Care (DoC) in England and Wales [RD7]. The waste DoC requires that a waste holder takes all responsible steps to ensure there is no unauthorised deposit, treatment, keeping or disposal of controlled wastes, that it does not escape from their control, and is only transferred to an authorised person.
- 2.22 The waste DoC also requires waste to be described in a way that permits its safe handling and management and that any transfer of waste is accompanied by a written description of the waste including a EWC code and in a way that identifies any properties relevant to its handling.
- 2.23 The person responsible for arranging waste transfer shall review the appropriate transfer note (non-hazardous) or consignment note (hazardous) as part of Horizon waste Duty of Care. They ensure whoever handles waste on our behalf has the appropriate documentation, copies of which shall be obtained and kept on record. This includes any company that undertakes a waste management activity such as recycling, treatment, reprocessing, or disposal.

Waste Permitting, Storage, Treatment and Transfer

- 2.24 Certain waste storage or treatment activities will require a permit or to be registered as exempt. Examples of on-site activities include the crushing, bailing or sorting of waste material that will require an appropriate exemption/permit to be applied for. These are monitored on each site through an Exemption Tracker.
- 2.25 This type of waste exemption for conventional (non-radioactive) waste should not be confused with radioactive material and waste which is 'exempt' from further regulation based on its radiological properties. Exemptions to store, treat or use conventional waste legally are issued by the Environment Agency (EA), Natural Resources Wales (NRW) and Scottish Environment Protection Agency (SEPA).
- 2.26 Waste management licences, environmental permits or exemptions should be checked to ensure all waste carriers, brokers and holders are licenced and permitted to handle the specific types of wastes in transit, from transfer from sites or offices to the final point of disposal. The Environment Agency public registers can help with these checks.
- 2.27 All permits/licences shall be obtained from the person undertaking the waste management activity prior to contract placement and waste being transferred off site. Checks should be undertaken on a regular basis of project waste by the organisations responsible for the management of waste. All staff and Contractors working on site or in the offices shall receive basic waste and recycling awareness training as part of induction.

Waste Carrier Licence

- 2.28 Any transport of waste from our sites or offices must be undertaken by a registered waste carrier holding an up to date licence, granted by Natural Resources Wales or the Environment Agency. Companies registered in Wales or England are legally entitled to collect waste anywhere in the UK.
- 2.29 A registered waste carrier will have a paper hardcopy licence with a 10 digit unique registration number beginning with CB. This number can be checked on the Environment Agency or Natural Resources Wales online public registers to ensure the licence is valid and renewed every three years. Only waste management companies and Contractors with a valid licence can remove waste from our sites.

Waste Exemptions

- 2.30 A Waste Exemption should be used for the storage, treatment, use or disposal of certain types and quantities of waste. However there are restrictions in relation to the quality, type or quantity of waste and the waste activity cannot pose a significant risk to human health or the environment.
- 2.31 A facility or location with a Waste Exemption will have a paper hardcopy which shows the requirements imposed on the site by Natural Resource Wales or the Environment Agency. This should be checked by the Site Waste Officer to ensure the site is operating under the condition covered by the Waste Exemption.
- 2.32 The facility will have a 15 digit Exemption Reference which begins EPR/. This shall also be checked by the Site Waste Officer using the regulators' public registers online.
- 2.33 Any waste exemptions will be owned by Horizon, Contractor or supplier depending on the requirement; for example the action of crushing inert waste can be covered by an exemption.
- 2.34 They need to be renewed every three years, so responsible parties need to coordinate and check the status of Waste Exemptions on a regular basis. Where a waste Contractor cannot provide the hardcopy of the Waste Exemption or the Exemption Reference they should stop works until they can provide the evidence.
- 2.35 A Waste Exemptions Tracker [RD4] is populated to list exemptions from waste permitting that are in place at our sites so that we can monitor their timeline, status and renewal dates. This will ensure that any waste permitting exemption is current and compliant.

Transfer Notes

- 2.36 A Waste Transfer Note (written information) must be completed for every waste receptacle that leaves our sites unless it is hazardous waste where a Hazardous Waste Consignment Note is needed.
- 2.37 A Transfer Note is a record of the transfer of waste from the producer to the waste Contractor. All Notes must be signed and dated by Horizon or the Contractor who generated the waste and the waste transfer company removing the waste.
- 2.38 The person signing the Waste Transfer Note does not need to be a waste expert but does need to use the Waste Management Checklist [RD3] (or the Contractors equivalent document), to ensure all fields of the Waste Transfer Note are filled in correctly.

- 2.39 The Waste Transfer Note will record details of the waste producer, the source, details of the waste carrier including the Waste Carrier Licence and details of the site the waste is being taken to; which would either have an Environmental Permit or Waste Exemption.
- 2.40 It also records the type and quantity of the waste being transferred, which is recorded as a description and using a code listed in the European Waste Catalogue.
- 2.41 A copy of the Waste Transfer Note shall be retained by Horizon/Contractor and waste carrier removing the waste from site to the facility it is managed. If the Contractor signs a Waste Transfer Note, Horizon reviews a copy of this and other Waste Transfer Notes during their monthly SWMP reviews.
- 2.42 Waste Transfer Notes must be kept for a minimum of two years.

Consignment Notes

- 2.43 The transfer of hazardous waste (as opposed to non-hazardous waste or inert waste) requires a Consignment Note rather than a Waste Transfer Note. All Consignment Notes must be signed by Horizon and the Contractor who generated the waste as well as the waste transfer company removing the waste.
- 2.44 The person signing the Consignment Note does not need to be a waste expert but does need to use the Waste Management Checklist [RD3] (or the Contractors equivalent document) to ensure all fields of the Consignment Note are filled in correctly. A copy of the Consignment Note shall be retained by Horizon or the Contractor who generated the waste, while another copy will accompany the waste carrier removing the waste from site to the facility it is managed.
- 2.45 As the producer of hazardous waste, Horizon or the Contractor acting on our behalf would be required to fill in section A and B of the Consignment Note. It is essential the Consignment Note is filled in fully and correctly as failure to do so will lead to the hazardous waste being rejected by the site it is sent to for treatment or disposal.
- 2.46 Not filling in the Consignment Note correctly would be a breach of the Hazardous Waste Regulations and may incur regulatory action by NRW at Wylfa or EA at Oldbury and Gloucester. A Consignment Note must be kept for three years either by Horizon or the responsible contractor.
- 2.47 In addition to the Consignment Note, Horizon or the Contractor that generated the waste will be issued with a Consignee Return from the waste Contractor which treats or disposes of the hazardous waste; these too must be kept for three years.
- 2.48 The Consignee Returns will be issued on a quarterly basis by the waste Contractor; where Horizon believes the Consignee Returns are missing or incomplete, a record of this must be made. Where Consignee Returns have not been issued, Horizon or the Contractor that generated the waste must request them in writing.
- 2.49 Where a business does not issue a Consignee Return within the quarter, Horizon or the Contractor that generated the waste should stop using them immediately and contact Natural Resource Wales or the Environment Agency to report the Contractor.

3 Site Waste Management Plan

- 3.1 A Site Waste Management Plan (SWMP) will be required for all projects, unless determined otherwise during the initial discussions between the Project Manager and Environmental Coordinator whilst preparing the Project Environmental Management Plan (PEMP).
- 3.2 Where required, a SWMP or similarly a Project Waste Management Plan (PWMP) for projects that are part of a package of works, will contain as a minimum the following:
- project details;
 - named persons and their roles and responsibilities;
 - waste minimisation actions and owners;
 - forecast of waste types and volumes including EWC codes;
 - names and Duty of Care information for waste carriers expected to be used;
 - names, locations and Duty of Care information for waste management facilities expected to be used on the project; and
 - list of subcontractors engaged with the project.
- 3.3 Throughout the project and at regular intervals (monthly as a minimum), the SWMP/PWMP will be updated with:
- actual waste types and volumes including EWC codes;
 - names and duty of care information for waste carriers and waste management facilities that were used;
 - progress on waste minimisation actions; and
 - updated list of subcontractors working on the project.

4 Donations

- 4.1 Where materials and products are given in good faith to charities, organisations and local people, these are not wastes. However this shall only occur where an end point has been identified for the item(s) and where a record has been transcribed between the two parties. For example, the donation of stone gate posts to local farmers to replenish broken or missing ones.
- 4.2 For donations by Horizon, the Site Waste Officer must be contacted to obtain the letter template produced for gifting items to the public. This shall never include any item that is hazardous or is suspected to be hazardous.
- 4.3 This letter shall be tailored to suit the type of donated item and signatures of both Horizon and the receiver of the donated item included.
- 4.4 Horizon will expect Contractors to have a similar system in place for any donations they make and all donations must be approved by the Head of Environment & Waste or their nominated representative in advance of the exchange.

5 Health & Safety

- 5.1 Health & Safety (H&S) and the Control of Substances Hazardous to Health (COSHH) are inherently linked to the management of conventional materials and waste, especially for transport and management of hazardous waste and some waste electrical and electronic equipment (WEEE).
- 5.2 Horizon staff and those working on our behalf such as Contractors, subcontractors and suppliers, should be aware of their role in complying with Health & Safety Executive (HSE) requirements, and record those risks, responsibilities and requirements in COSHH sheets, Risk Assessments and Method Statements (RAMS).
- 5.3 Where demolition, reuse and recycling is concerned, there is an additional requirement to consider the hazards and risks associated with conceptual design advice for those involved in recovery, reuse and recycling activities.
- 5.4 For example, hazardous temporary situations and hazardous substances, including soils containing asbestos, the crushing of concrete, bricks and other hard and inert materials using plant and machinery, and the processing of soils and clays using plant and machinery.

6 Records associated with the procedure

- 6.1 Records associated with this procedure shall be controlled, stored and archived in accordance with the Management of Records [RD8] process.

Table 6.1 Records

Record Title	Retention Period	Record Owner	Where Record Is Retained
Waste Transfer Notes	2 years	Contractor / Facilities Manager	Contractors' Site Files Facilities Manager Technical Manual 17
Hazardous Waste Consignment Notes	3 years	Contractor / Facilities Manager	Contractors' Site Files Facilities Manager Technical Manual 17
Season Ticket	2 years	Contractor / Facilities Manager	A single waste transfer note that covers a series of waste transfers: Facilities Manager Technical Manual 17
Materials Management Plan Verification Report	3 years	Contractor/ Site Waste Officer	Contractors' Site Files Horizon Environment & Waste Management Team SharePoint Site
WMC Site Visit Record	3 years	Site Waste Officer	Horizon Environment & Waste Management Team SharePoint Site
SWMP Monitoring Record	3 years	Site Waste Officer	Horizon Environment & Waste Management Team SharePoint Site

Record Title	Retention Period	Record Owner	Where Record Is Retained
Permitted Activities	6 years	Contractor / Site Waste Officer	Horizon Environment & Waste Management Team SharePoint Site

7 Performance indicators

- 7.1 To ensure the implementation of the requirements specified in this arrangement is effective in relation to quality it will be measured by the internal audit programme in accordance with the Audits and Inspections [RD9] process.
- 7.2 Any non-conformance raised following review and assessment will be managed in accordance with the Corrective Action Programme [RD10] process.

8 References

Table 8.1 References

Ref. No.	Document Number	Title
[RD1]	http://www.nuclearinst.com/write/MediaUploads/SDF%20documents/clearance_and_exemption_code_of_practice_final_issue_2_min_size.pdf	Clearance and Radiological Sentencing: Principles, Process and Practices for Use by the Nuclear Industry – A Nuclear Industry Code of Practice, Issue 2, December 2012
[RD2]	HG-S-07-PSD-02-370	Conventional Materials & Waste
[RD3]	HG-S-07-F-04-600	Waste Management Checklist
[RD4]	Site File	Waste Exemptions Tracker
[RD5]	HG-M-05-PRC-03-1212	Corporate Radioactive Waste Adviser (RWA) Body Provision of Advice
[RD6]	HG-M-05-PRC-03-1218	Corporate Radiation Protection Adviser (RPA) Body Provision of Advice
[RD7]	http://www.legislation.gov.uk/uksi/2011/988/contents/made	The Waste (England and Wales) Regulations 2011
[RD8]	HG-S-04-PSD-02-850	Management of Records
[RD9]	HG-M-05-PRO-03-766	Audits and Inspections
[RD10]	HG-M-06-PSD-02-828	Corrective Action Programme

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CONTACT US:

If you have any questions or feedback regarding the Wylfa Newydd Project you can contact us on our dedicated Wylfa Newydd Freephone hotline and email address, by calling on **0800 954 9516** or emailing **wylfaenquiries@horizonnuclearpower.com**

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