

WASTE MANAGEMENT STANDARD



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1. INTRODUCTION

This standard expands on CHL Limited's (CHL) overarching Environmental Policy Statement and Environmental Management Standard by outlining specific approaches to waste management activities.

Waste in any form has the potential to cause harm to both people and the environment. All organisations have responsibility for ensuring that waste arising from their activities is handled and disposed of in a responsible and compliant manner.

Waste is often defined as: *“any substance or object which the holder discards or intends or is required to discard”*. Something can be waste even if the producer still has a use for it or other people are prepared to pay for it. Surplus materials are not typically considered waste if they remain in their original manufactured product form and do not need to be re-processed in order to be reused.

Reducing, reusing, and recycling waste minimises the negative environmental impacts associated with the extraction, processing and transportation of raw materials and their end-of-life disposal. Significant costs can also be saved by avoiding the generation of waste in the first place.

2. SCOPE

This waste management standard applies to all operational activities under the control and influence of CHL. This includes all-associated sites, services, contractors, and suppliers.

In certain situations, additional or expanded waste management arrangements might be required that are applicable to specific sites, assets, or activities. In these cases, bespoke arrangements will be developed and maintained by the relevant business area or operational team.



3. REGULATORY FRAMEWORK

The law requires anyone dealing with waste to keep it safe, make sure it is dealt with responsibly and only given to businesses authorised to take it.

3.1 Legislation

In order to ensure CHL is compliant with all relevant environmental, legal and regulatory requirements, it maintains an environmental compliance register.

The register is stored in an electronic format on SharePoint and updated regularly by the Environmental Compliance Manager.

The list below outlines some, but not all, key waste legislation applicable to CHL.

- Control of Pollution Act 1989
- Landfill (England and Wales) Regulations 2002
- End-of-Life Vehicles Regulations 2003
- Hazardous Waste (England and Wales) Regulations 2005
- The Building Regulations 2010 (Part H)
- Waste (England and Wales) Regulations 2011
- Control of Asbestos Regulations 2012
- Controlled Waste (England and Wales) Regulations 2012
- Scrap Metal Dealers Act 2013
- Waste Electrical and Electronic Equipment Regulations 2013
- Environmental Permitting (England and Wales) (Amendment) Regulations 2014
- Environmental permitting (England and Wales) Regulations 2016
- Environmental permitting (England and Wales) (Amendment) Regulations 2023
- The Environment Act 2021

3.2 Waste carrier, broker, dealer licences

Any individual or business must be registered with the Environment Agency to: 1. transport waste (Carrier), 2. buy, sell or dispose of waste (Dealer) or 3. arrange for someone else to buy, sell or dispose of waste (Broker). The 'Upper Tier' version of the licence is required to transport other people's waste or carry construction and demolition waste types.



3.3. Environmental permits

Anyone who uses, recycles, treats, stores, or disposes of waste may need to apply to the Environment Agency for an Environmental Permit. This permit can be for activities at one site or for mobile plant that can be used at many sites.

3.4 Waste exemptions

Certain lower risk waste activities can be exempt from requiring an Environmental Permit but still typically have to be registered with the Environment Agency. Each type of exemption has specific limits and conditions that must be met

3.5 Regulatory position statements

In certain cases, the Environment Agency does not enforce the need for either an Environmental Permit or registered Waste Exemption. Regulatory Position Statements (RPSs) outline the specific conditions and requirements that must be met.

All waste licences, permits and exemptions used by CHL (internal and external) must be recorded on CHL's Waste Register, held by the Environmental Compliance Manager.

Internal records will be periodically checked against those published on the [Environment Agency's Public Register](#)



4. THE WASTE HIERARCHY

Anyone dealing with waste on behalf of CHL is expected to apply the waste hierarchy.

Regulation 12 of the Waste (England and Wales) Regulations 2011 effectively states that any business which undertakes waste activities, must take all reasonable measures to apply the waste hierarchy.

This hierarchy ranks waste management options from an environmental (and often financial) perspective. It gives top priority to preventing waste in the first place.



1. Reduce

Keeping existing products for longer or using less material in design and manufacture.

2. Reuse

Checking, cleaning, repairing, refurbishing, whole items, or spare parts.

3. Recycle

Processing waste into a new substance or product.

4. Recover

Includes anaerobic digestion, incineration, gasification, and pyrolysis which produce energy.

5. Disposal

Landfill and incineration without energy recovery.

Please Note:

- Certain hazardous waste types (like asbestos) cannot be re-used or recycled under any circumstances.
- Certain waste types can only be incinerated, like clinical healthcare items or infectious material.
- Government guidance on applying the waste hierarchy [Waste hierarchy guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67191/waste-hierarchy-guidance.pdf)



5. THE CIRCULAR ECONOMY

Anyone dealing with materials or waste on behalf of CHL is expected consider and apply the circular economy principals. This is particularly relevant to those involved in project design and planning.

Expanding on the Waste Hierarchy, the circular economy model involves extending material lifecycles and lifespans as long as possible.

The aspirational aim is to 'close the loop', keeping existing products and materials in constant circulation, reducing demand for further resource extraction and waste disposal.

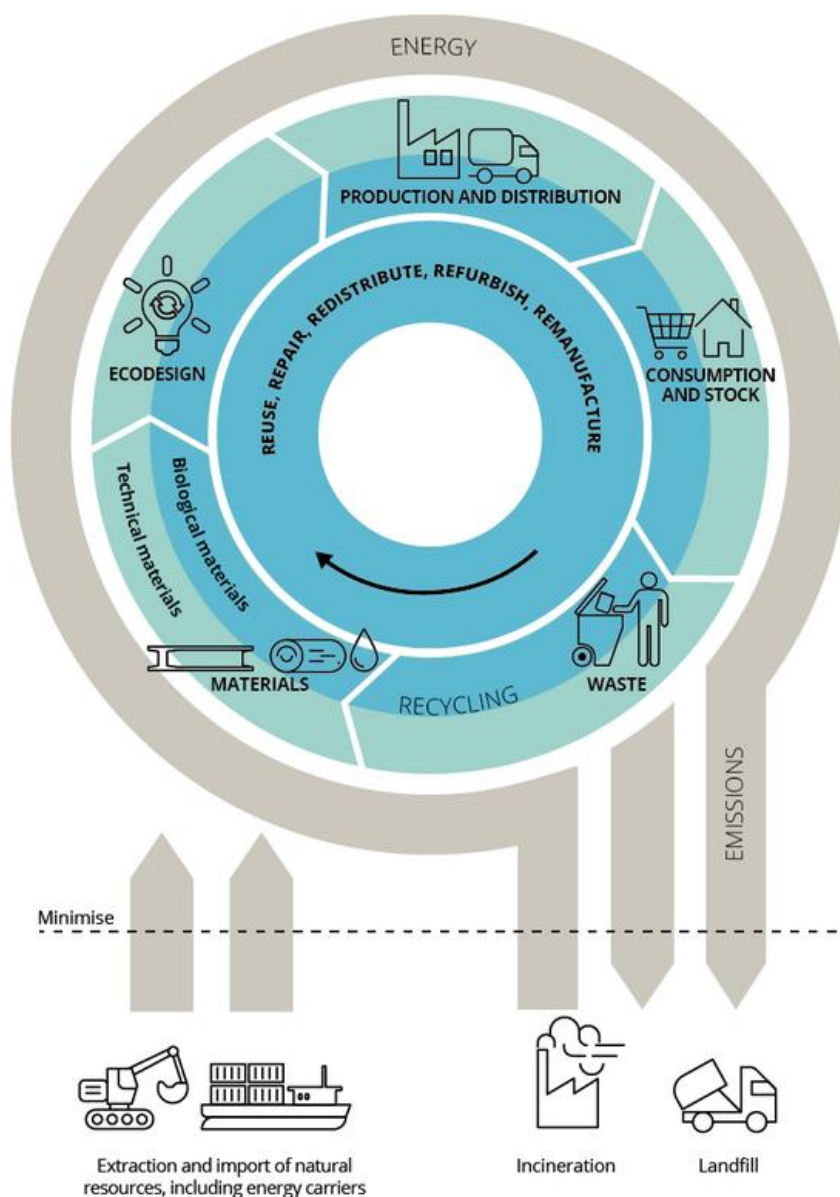


Diagram from: [European Environment Agency](#)



6. WASTE CLASSIFICATION

It is the legal responsibility of waste producers to correctly classify material and know what it contains. It is illegal to classify waste incorrectly or to mix hazardous and non-hazardous wastes together.

All waste must be classified with a six-digit [European Waste Code \(EWC\)](#) before it can be transferred.

Classification of waste should be considered at the earliest opportunity, especially if it has the potential to be hazardous as further requirements apply. Early classification and careful planning can help to ensure compliance, avoid project delays, and reduce costs.

There are three main waste categories:

6.1 Non-hazardous waste

The majority of CHL waste is non-hazardous. The most common non-hazardous EWC types encountered are already listed in 'Section A' of internal Waste Transfer Note templates. Examples include (but are not limited to): paper, plastic, glass, brick, concrete, stone, and metal.

6.2 Hazardous waste

Waste is considered hazardous if it (or the material or substances within it) are harmful to humans or the environment. Hazardous EWC types are always marked with an asterisk (*). Examples include (but are not limited to): asbestos, chemicals, batteries, oils, infectious clinical waste, coal tar contaminated asphalt and most Waste Electrical and Electronic Equipment (WEEE).

6.3 Mirror waste types

Certain waste types (such as soil, dredging spoil, treated wood and asphalt) can be either hazardous or not, depending on whether they contain dangerous substances at or above certain levels. These waste types are usually covered by two paired waste codes, called 'mirror' entries. In these instances, laboratory testing must be undertaken to correctly assign one of the two mirror EWC entries and arrange disposal. This is the only recognised way to prove if a waste is harmless or harmful. Mirror waste types should typically be treated as hazardous until proven otherwise.



Note:

- Non-hazardous wastes are not always inert (non-reactive). For example, grass cuttings are not harmful, but do biodegrade, releasing methane gas as they break down.
- There are additional requirements for upholstered items containing [Persistent Organic Pollutants](#).

Any waste testing should ideally be arranged prior to transfer. In some cases, disposal cannot be arranged without test results.

6.4 Special exceptions

[Regulatory Position Statement \(RPS\) 211](#) allows up to 10 cubic metres of excavated waste from unplanned utilities installation and repair works to be classified as non-hazardous without testing, providing that the various conditions and requirements can be met.

Government technical guidance on how to assess and classify [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](#)

6.5 Mixed waste

While efforts should be made to avoid the generation of mixed waste in the first place, this will be challenging for certain operational activities due to excavation, generation or collection methods.

Mixed wastes should ideally be separated retrospectively where it is safe to do so and technically and economically feasible. In some cases, external waste management contractors undertake this activity on behalf of CHL.

The first step in coding and classifying a mixed waste is to determine whether separate easily identifiable waste types are present. The general principle is that if 3 different items of waste are placed in a single container, then that container contains 3 different waste types (each of which must be separately assessed described and coded). Where this is not possible, there are certain six-digit [European Waste Codes \(EWC\)](#) specifically for 'mixtures or 'mixed' waste types.

Mixing different hazardous waste types together or diluting hazardous waste with other material is illegal.



7. STORAGE AND SEPERATION

All waste must be stored safely, securely, and separately, so that:

- Different waste types do not mix and cause cross contamination.
- Waste can be reused, recycled, or recovered easily.
- Waste cannot escape and cause harm to people or the environment.
- Waste transfer documentation can be completed correctly.

Anyone storing waste on behalf of CHL must:

- Store waste in a secure place.
- Use suitable containers that will stop waste escaping.
- Label containers clearly with the type of waste they contain.
- Use covers to stop waste blowing away.
- Use waterproof covers if rain could cause contaminated run-off or prevent waste from being reused.

7.1 Hazardous liquid wastes

Secondary containment is required for storing hazardous liquid wastes. The bund must be able to hold 110% of the capacity of the largest container, or 25% of the combined total volume of the containers you are storing – whichever is the larger figure.

7.2 Storage permissions

Waste storage activities sometimes require legal permission. If you store small amounts of your own waste temporarily, or operate a waste collection point, you may not need to register an exemption, but you must still comply with certain limits and conditions.

8. WASTE MANAGEMENT PLANS

Careful planning can help to ensure legal compliance, avoid project delays, and reduce disposal costs.

While waste management plans are no longer a legal requirement for projects meeting a financial threshold, they are still considered ‘best practice’ and are encouraged for all major infrastructure projects.



9. WASTE EXEMPTIONS

Exemptions allow certain 'lower risk' activities to be undertaken without an Environmental Permit:

- Storing Waste
- Treating Waste
- Using Waste
- Disposing of Waste

Locations where these activities are taking place must be registered with the Environment Agency and in some cases can also require planning permission. Each type of waste exemption has strict conditions and limits which must be met.

The Environmental Compliance Manager must be informed prior to any waste exemption being registered or renewed.

All internal and external waste exemptions used by CHL must be recorded on CHL's Waste Permissions Register.

If the limits and conditions of a waste exemption cannot be met, the activity must not take place until an [Environmental Permit](#) has been granted by the Environment Agency.

10. ARRANGING WASTE SERVICES

The law requires anyone dealing with waste to ensure it is only given to businesses authorised to take it.

Only sites and companies on the CHL's Waste Permissions Register can be used. This because all waste carriers (hauliers) must be licensed, and every location (internal or external) must have an appropriate environmental permit or exemption to be able to legally accept waste material.

Internal records are periodically checked against those published on the [Environment Agency's Public Register](#).



10.1 Procurement and contractors

All external waste contractors (transport, treatment, or disposal) will be assessed and must be reputable and competent.

Appropriate qualifications and licences must be possessed in advance of any contract being arranged with CHL Limited.

11. WASTE TRANSFER DOCUMENTATION

Every load of waste that is received from others or passed onto others must be covered by either a 'Waste Transfer Note' or 'Hazardous Consignment Note' (even if it is from site to depot).

These documents ensure there is a clear audit trail from waste production to waste disposal. They are also often used internally to check certain financial invoices are correct.

Waste regulators such as the Environment Agency can request waste transfer documentation at any time. CHL and those working on its behalf must be able to provide this information on request without delay.

To ensure legal compliance and prompt invoice processing, it is important that all sections of the notes are completed fully and accurately. It is also essential that the correct procedure is followed for the different coloured copies of each completed note (typically printed internally on triplicate carbon copy paper).

There are three main types of transfer documentation:

11.1 Waste transfer notes

- For non-hazardous waste types only
- Copies of must be kept for a period of at least 2 years, as required by legislation.

11.2 Hazardous consignment notes

- For hazardous waste types only
- Must stay with hazardous waste until it reaches its final destination.
- Copies must be kept for a period of at least 3 years, as required by legislation.

11.3 Season tickets

For multiple transfers of non-hazardous waste over a year (such as bin or skip collection service). This is sometimes also called an 'annual waste transfer note'. The current holder of the waste, the waste carrier and the type of waste must stay exactly the same for the duration of the season ticket. If any of these details change, a new season ticket must be issued, or regular waste transfer note used instead.



Copies of all completed transfer documentation must be uploaded and attached to the relevant Workday financial record, to ensure that they are accessible, searchable, and stored for the required length of time.

12. FLY-TIPPED WASTE

Fly-tipping is the illegal dumping of waste on land or in water (usually to avoid disposal costs). It can often contain hazardous substances (such as asbestos) and can cause significant harm to people, places, and the wider environment.

- Fly-tipped waste on CHL land should be reported via Grounds.maintenance@cornwallhousing.org.uk
- Further information on this topic can be found on Cornwall Council's website [Fly-tipping - Cornwall Council](#)
- Large scale waste crime and urgent environmental incidents can be reported on the Environment Agency's 24-hour hotline: 0800 80 70 60.

13. ROLES AND RESPONSIBILITIES

Anyone working on behalf of CHL has a duty to manage waste in accordance with the principles of this standard. Specific requirements are determined by each business area, however some of the key roles and responsibilities are summarised below:

- **Directors & Heads of Services**
 - Ensuring the principles of this standard are followed within areas of responsibility.
 - Ensuring suitable and sufficient resources are available and allocated to manage waste in accordance with legislation and best practice.
- **Environmental Compliance Manager**
 - Providing technical support on waste management matters.
 - Focusing particular attention on hazardous, non-recyclable and high-volume wastes.
 - Investigating and pursuing innovative waste recycling initiatives and partnership.
 - Monitoring, reviewing, and reporting waste management performance.



- **Health & Safety Manager**
 - Ensuring that waste activities do not harm people.
- **Procurement**
 - Overseeing contractor and supplier performance, engagement, and communication.
 - Identifying, arranging, and allocating appropriate licenced waste service providers.
- **Surveyors, Supervisors & Managers**
 - Managing waste in a way that prevents harm to both people and the environment.
 - Developing suitable and sufficient risk assessments and method statements for work activities.
 - Communicating risks, methods and expectations to operatives and contractors.
 - Escalating and reporting all waste issues, incidents, and near-misses in a timely manner.
- **Administrators & Support Officers**
 - Checking and processing waste transfer documentation.
 - Collating waste data and reporting performance at a project or contract level.
- **Operatives & Other Employees**
 - Working to the standards and expectations outlined by the site supervisor or site manager.
 - Undertaking activities as instructed in accordance with risk assessments and method statements.
 - Reporting all incidents and near-misses to supervisors and managers as soon as possible.
- **Contractors & Suppliers**
 - Preventing harm to people or the environment and working in accordance with the standards and expectations outlined by CHL.



14. INTERESTED PARTIES

Key regulatory bodies for waste activities include:

14.1 Environment Agency (EA)

This executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs (DEFRA) has responsibility for regulating and enforcing waste management legislation, including the licensing of sites and carriers. The Environment Agency also acts in an advisory capacity, assisting Central Government with policy formation and offering assistance to business and industry on waste management practices, waste minimisation and recycling.

14.2 Local Authority (Cornwall Council)

Local authorities have statutory duties to arrange for the collection and disposal of household waste in their area. In undertaking these duties, local authorities offer waste services to householders such as kerbside collections, bulky collections, and household waste recycling centres (HWRC). Local Authorities also have certain regulatory responsibilities, such as enforcing waste site planning permission and ensuring noise, dust, odour, and litter from waste activities is controlled.

14.3 Health and Safety Executive (HSE)

This national regulator for workplace health and safety is responsible for protecting people. The HSE is tasked with improving the health and safety performance of industry, to reduce work-related accidents and occupational ill-health. This extends not only to employees, but also to members of the public whose health and safety may be affected by waste activities.

Other interested parties may potentially include:

Clients, Contractors, Suppliers, Local Residents and Landowners.



15. MONITORING AND REPORTING

15.1 Near misses and incidents

All waste related near misses and incidents must be reported on the internal reporting system on Entropy.

Trends and root causes will be analysed to ensure effective corrective action which prevents reoccurrence.

Near Miss:	Incident:
Event which happened but did not cause environmental harm or damage. Waste example: Batteries mistakenly put in general bin but discovered and removed.	Event which happened and resulted in environmental harm or damage. Waste example: Hazardous waste items illegally fly-tipped on construction site overnight.

15.2 Audits and inspections

Documented internal audits and inspections of waste activities will be undertaken by the environmental compliance team, operational managers, and site supervisors. All business areas will be reviewed at least annually, with additional oversight for higher risk activities or locations.

Regular third-party audits will additionally take place. CHL reserves the right to undertake audits of external waste contractors. This includes transportation, treatment, and disposal activities, to ensure services are compliant and being undertaken in accordance with agreed standards and performance expectations.

15.3 Non-compliance

CHL's definition of non-compliance is "any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to the environment". All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred or becoming aware of it.



Any non-compliance issue identified at an operational level will be formally reported to the Head of Asset Management in the first instance, who will agree an appropriate course of corrective action with the Environmental Compliance Manager and report details of the same to the ELT.

In cases of serious non-compliance, ELT and CHL Board will consider whether it is necessary to disclose the issue to Council, prior to a disclosure to the Regulator or any other relevant organisation such as the Health and Safety Executive.

15.4 Key performance indicators

CHL will report comprehensive key performance indicators (KPIs) for environmental management. The Senior Leadership Team will be notified on a monthly basis of the following.

- No. of environmental non-conformities
- No. of environmental incidents and near misses

CHL will report annual data on the following waste key performance indicators:

Category	Indicator	Metric
Waste	Total waste	tonnes
Waste	Fly-tipping	tonnes
Waste	Total recycling	tonnes
Waste	Total waste to landfill	tonnes
Waste	Waste generated by contractors	tonnes

16. DOCUMENT REVIEW

This document may be reviewed at any time at the request of either staff or management but will automatically be reviewed twelve months from initial approval unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.



17. APPENDIX – GUIDANCE ADVICE NOTES

The following guidance advice notes are available to CHL employees through SharePoint

- [CHL Waste Transfer Guidance Note](#)
- [Waste transfer documentation](#)
- [Waste classification](#)
- [Demolition waste](#)
- [Electrical waste](#)
- [Hazardous waste](#)
- [Waste segregation and storage](#)
- [Exempt waste activities](#)

