

## Twickenham Rediscovered Programme - Riverside Site Waste Management Framework

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<b>Abstract</b>	
<p>The purpose of this document is to set out the framework for the waste management strategy for the construction of the Twickenham Rediscovered Project, which incorporates 1, 1A, 1B King Street, the west side of Water Lane between King Street and The Embankment and the north side of The Embankment between Water Lane and Diamond Jubilee Gardens, Twickenham.</p>	

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## 1 INTRODUCTION

The purpose of this document is to set out the framework for the waste management strategy for the construction of the Twickenham Rediscovered Project, which incorporates 1, 1A, 1B King Street, the west side of Water Lane between King Street and The Embankment and the north side of The Embankment between Water Lane and Diamond Jubilee Gardens, Twickenham.

The design for this site consists of a mixed use development of residential flats, retail space and office provision and a planning application is proposed by the end of 2017. The current site plan is shown below:



**Diagram A: Current Site Plan**

This waste management framework will provide the approach and actions which will be undertaken by the project to manage waste during the design, procurement and construction phases. A Site Waste Management Plan (SWMP) will be prepared from the RIBA Stage 4 design phase which will build on this framework and implement the actions contained within. The SWMP will be a living document which will be updated throughout the remaining design phases and into the procurement and construction phases once a main contractor has been appointed. A separate Servicing and Delivery Strategy has been prepared by Systra which will address the waste management strategy for the site once in operation.

This waste management framework has been prepared on the basis of the current initial design information and gives an indication of our general approach to the management of waste produced by this project.

## 2 DECLARATION

Section 6 (5) of the SWMP Regulations 2008 requires both the client and the principal contractor to make the following declaration.

By signing this declaration we acknowledge that will take all reasonable steps to ensure that:

a) all waste from the site is dealt with in accordance with the waste duty of care in section 34 of the Environmental Protection Act 1990 (a) and the Environmental Protection (Duty of Care) Regulations 1991 (b); and

b) materials will be handled efficiently and waste managed appropriately.

c) participation of all Designers in the production of the SWMP has been recognised.

### **3 ROLES AND RESPONSIBILITIES**

#### **Design Lead**

The design team leader must ensure that waste minimisation is considered throughout each design stage. They will be responsible for ensuring that the design decision record is created during the design phase.

#### **Pre-Construction Manager**

The pre-construction manager is responsible for ensuring the Predicted Waste Streams and Quantities, Waste Management Options and Duty of Care Schedule are completed along with the declaration and decisions record during the pre-construction stage of the project. They will also obtain copies of sub-contractors and Suppliers Waste Carriers Licences and Waste Management Licences and estimates of their anticipated waste quantities. The pre-construction manager refines the indicative site layout plan detailing material storage areas, skip and recycling areas and materials handling equipment. They are also responsible for completing the Policy, Design, Planning and Procurement Stages of SWMP checklist.

#### **Construction manager**

The construction manager holds overall responsibility for material storage on site and implementation of the Site Waste Management Plan. They will review the sections of the SWMP completed in the pre-construction phase to ensure they are correct and up-to-date and ensure that any amendments to the site layout are recorded in the Site Plan and complete the construction section of the SWMP checklist. They are also responsible for keeping the Duty of Care Schedule up-to-date and ensuring that all waste materials produced and leaving site are recorded in the Waste Data Sheet.

#### **“Waste Champion”**

A waste champion will be appointed who is responsible for ensuring that the Site Waste Management Plan is followed on site. Responsibilities of the Waste Champion include to:

- Maintain and regularly update the Site Waste Management Plan.
- Ensure all waste storage containers are clearly labelled and wastes are segregated correctly.
- Ensure that best practice is followed on site.
- Make sure that the Duty of Care is complied with at all times and that any waste produced on site is handled safely and within the law.
- Ensure that the correct documentation is held for waste contractors using the site and controlled waste transfer notes and hazardous waste consignment notes for waste removed from site are complete, accurate and filed in a systematic manner.
- Keep accurate records of the types and quantities of waste leaving site through use of the waste data spreadsheet.

- Be a point of contact with regards to waste questions, queries and problems.
- Attend training sessions on waste minimisation, and disseminate the information to the rest of the team. Ensure all site personnel know their responsibilities for site waste management and arrange training where necessary.
- Engage in project meetings aimed at keeping track of and recording progress.
- Implement waste minimisation as an important part of company culture and co-ordinate reduction, reuse and recycling initiatives between sub-contractors.
- Motivate and encourage minimisation of all types of waste, including efficient use of water and electricity.

The Waste Champion should be an employee of the main contractor in order to ensure retention of knowledge and policy continuity for the duration of the construction project. The nominated person should have the authority and enthusiasm to implement the ideals of the SWMP across site and have the visible support of management. The above roles and responsibilities can be undertaken directly by the Waste Champion, or delegated accordingly.

All staff who have undertaken waste champion training will be recorded in a training log.

#### **4 SITE WASTE MANAGEMENT PLANNING**

Before the project commences, information is collected and recorded on the waste likely to be produced throughout the project and the available options for reduction, reuse, recycling and disposal.

Sub-contractors and Suppliers should be asked at time of enquiry to submit copies of their Waste Carrier Registrations, Environmental Permits (along with corresponding permitted waste(s) schedules) and an estimate of their anticipated waste quantities. They should also be asked to provide regular recycling performance reports in order that landfill diversion performance can be regularly recorded.

#### **5 PRE-DEMOLITION AUDIT**

Prior to demolition of the buildings on site, a pre-demolition audit will be conducted which will provide detailed information on materials that can be reclaimed and recycled, so reducing the cost and environmental impact of waste disposal, bringing savings from re-using existing materials and earnings from selling those that aren't needed.

The pre-demolition audits will:

- Identify volumes of wastes so that plans to re-use, recycle and recover can be drafted prior to work starting.
- Assist in the identification of markets for recycled or recovered material
- Identify reclamation and re-use potential both on-site and off-site
- Influence local and national material valuation
- Increase material and labour efficiency, reduce waste and maximise profit
- Assist in waste segregation recommendations and
- Environmental quantification.

It is expected that the ICE Demolition Audit protocol or similar standard of audit will be used.

## 6 WRAP QUALITY PROTOCOL

WRAP Quality Protocols set out steps that must be taken for waste to become a non-waste product or material that can be either reused by business or industry, or supplied into other markets, enabling recovered products to be used without the need for waste regulation controls. The Quality Protocol for the production of aggregates from inert waste details a formalised quality control procedure for the production of aggregates from inert waste.

Summarised evidence of compliance must be filed in this section of the SWMP or a reference to the location of the evidence must be provided.

Further information / process guidance can be obtained by accessing the web link below.

[http://aggregain.wrap.org.uk/quality/quality\\_protocols/](http://aggregain.wrap.org.uk/quality/quality_protocols/)

## 7 CL:AIRE CODE OF PRACTICE

In September 2008, Contaminated Land: Applications in Real Environments (CL:AIRE) published the Definition of Waste: Development Industry Code of Practice, which sets out good practice in dealing with excavated materials and their reuse. The Code signals a move from prescriptive waste management regulations to a risk based approach. Developers can self regulate when re-using surplus soil, speeding up site preparation, reducing the amount of soils sent to landfill and can therefore save money.

Under the Code, there is now less need to involve the Environment Agency, who previously controlled the process under a permit or a permitting exemption. The decision on whether to re-use soil now rests with the principal contractor as long as the Code is carefully followed, the scope is agreed with the regulator and the working plans are signed off by a Qualified Person.

The Code does not distinguish between contaminated and uncontaminated soils, but instead advocates a “suitable for use” approach, whereby a risk assessment is used to decide whether or not the material can be re-used. The Code requires a comprehensive documented audit trail in the form of either a Remediation Strategy or a Design Statement, depending on the contamination status of the material. The document must include:

- Desk and site investigations
- Conceptual Site Model
- Risk Assessment
- Materials Management Plan
- Verification plan
- Signed declaration from a Qualified Person confirming documentation adheres to the Code.

This must be sent to the Environment Agency to arrive at least one week before work begins.

Upon completion of the work a Validation Report must be prepared and kept by the developer for a minimum of two years.

The Code stipulates that the “Qualified Person” should be chartered in a relevant discipline, have attended a one-day CL:AIRE training course and have at least five years relevant

experience. They must be at arms length from the project but may still work for the company that prepares the audit trail.

The Code only applies where the material is suitable for use, where re-use of excavated material is a certainty, where only the required volume of material will be used and if the material will not harm the environment or human health. Currently the Code of Practice applies only to soil being re-used on the same site or at a predefined cluster of sites. Re-use of soil on other sites is not yet covered, nor is soil coming from a fixed treatment facility. These activities continue to be regulated by the environmental permitting regime.

A summary of evidence or a reference to the location of the evidence must be provided in this section of the SWMP. Further information regarding the code can be found by accessing the web link below.

<http://www.claire.co.uk/>

## 8 DESIGN DECISIONS RECORD

The Site Waste Management Plan Regulations 2008, and in particular Section 6(3), includes the requirement that the Site Waste Management Plan must record any decision taken on the nature of the project, its design, construction method or materials employed in order to minimise the quantity of waste produced on site, including those made before the SWMP was drafted. This record will be updated at least quarterly or as frequently as necessary.

This requirement **applies to all designers** - where a package is identified as sub-contractor design, as the designer, the sub-contractor must also produce comments on waste minimisation during the design stage. Each designer must produce a summary.

The following information will be recorded in the Design Decision Record:

- Package / Element
- Design Responsibility
- Decision and effect on waste on site
- Date of Entry

## 9 WASTE CHECKLIST

A waste checklist will be compiled at the start of RIBA Stage 4 design which will consider the questions and assign an owner to each. The checklist is split into the following phases: policy; design; planning; procurement; construction; and post completion.

### *Policy*

1. Has the client stipulated any specific waste management or recycling requirements?
2. Has on site segregation been considered in preference to offsite segregation?
3. Where on site segregation is to be practised, has the segregation of waste streams been maximised? Or is waste going to an MRF or Transfer Station for separation?
4. Is there a requirement to segregate wastes on site for BREEAM/CfSH credits?
5. Is there a requirement to use recycled materials to gain BREEAM/CfSH credits?
6. Is WRAP's Net Waste Tool to be used on the Project?

### *Design Stage*

1. Has waste been designed out of the project through standardisation of components and sizes?
2. Has the design been reviewed by specialist suppliers and contractors? (E.g. BG or Lafarge on specification of walls, etc.)
3. Have demolition audits been specified to plan for reuse and recycling of available materials?
4. Does the specification encourage the use of recycled materials?
5. Have offsite fabrication and modern methods of construction been considered?
6. Has responsibility for producing the initial plan been assigned to a responsible individual in the Planning Department?
7. Has the client provided a record of all decisions made to minimise waste during the design process?
8. Has the decisions record been completed for decisions in design?

### *Planning Stage*

1. Have sub-contractors been asked to estimate their anticipated wastage?
2. Have estimated waste streams been identified, quantified and recorded?
3. Have options for dealing with reusable and recyclable materials been identified and recorded?
4. Has a site plan been prepared showing material handling areas and designated areas for skip and recycling; including the sizes and types of skips required?
5. Have onsite crushers and screens been considered?
6. Have compactors been considered for packaging?
7. Have shredders been considered?
8. If crushing plant is to be used on site:
  - is the plant operator able to provide evidence of a Part B Mobile Plant Permit?
  - is the plant operator able to provide “notification of redeployment” of the plant to the site?
  - has it been determined whether the crushing activity will fall under the T7 Exemption or Environmental Permit requirements of the Environmental Permitting Regulations (EPR) 2010?
  - has an application been made to the Local Authority where the site is situated?
9. If processing material on site:
  - (grading and blending crushed rubble and concrete), has it been determined whether the activity will fall under the T5 Exemption or Environmental Permit Requirements of the EPR 2010?
  - (reducing in size wood and plant matter) has it been determined whether the activity will fall under the T6 Exemption or Environmental Permit Requirements of the EPR 2010?
  - has the relevant application route through the Environment Agency for either activity been followed?
10. Where there is intention to use crushed concrete, bricks and ceramics on site:
  - does the amount fall within the requirements of the EPR 2010 under the U1 Exemption or Environmental Permit criteria?
  - if so, has an application for either been made to the Environment Agency?
  - if the quantity of material exceeds the U1 Exemption allowance is the WRAP Quality Protocol going to be followed as an alternative to the Environmental Permit Process to demonstrate that the material is not waste?



11. Where there is intention to recover aggregates from construction, demolition and excavation waste and sell them as products (recycled aggregates), rather than waste, has the WRAP Quality Protocol been complied with?
12. If the site is on Brownfield land and there is intention to reuse excavated material on site:
  - has it been determined if the material is suitable for use without treatment?
  - if not, has it been determined whether the amount falls within the requirements of the EPR 2010 under the U1 Exemption or Environmental Permit criteria?
  - has an application for either been made to the Environment Agency?
  - where the quantity of material exceeds the U1 Exemption allowance is the CL:AIRE Code of Practice being followed to reclassify the material as a resource as an alternative to the Environmental Permit Process?
13. Where there is intention to use imported soil on site, has the soil been certified as 'clean'? Has a U1 Exemption been applied for through the Environment Agency?
14. Where relevant, has discharge consent been obtained from the Environment Agency and or water company?
15. Have sub-contractors identified as major waste producers been asked to produce a Waste Management Plan or contribute data to the SWMP?
16. Has the declaration been signed by both the client and main contractor?

#### *Procurement Stage*

1. If sub-contractors are removing their own waste have they been asked for:
  - their Waste Carriers Registration and
  - a Permit/Exemption for the landfill/ recycling facility they are using prior to letting the order?
2. Are all sub-contractors tied in to a Site Debris & Waste Conformance Agreement?
3. Have "take back schemes" been established?
4. Have quantities been checked to avoid over ordering?
5. Have deliveries been checked to avoid double handling?
6. Has packaging been omitted where possible?
7. Has a Waste Champion been appointed?

#### *Construction Stage*

1. Are all operatives advised of the SWMP at their site induction?
2. Is the SWMP discussed at the sub-contractors monthly site meeting?
3. Are containers/ skips clearly labelled to avoid confusion?
4. Has the 'reused materials' log been used to record materials that have been reused, recycled or reprocessed?
5. Have toolbox talks been planned for all site personnel about waste management on site?
6. Are any checks made that excavation materials/ waste is received at the intended site?
7. Who has been nominated to check and control skips and sign tickets?
8. Are reports regularly produced?

#### *Project Completion*

1. Has a final report of use of recycled and secondary materials, waste reduction, segregation, recovery and disposal (with costs and savings identified) been completed?
2. Have key waste management issues been considered for action at future projects?

## 10 BREEAM COMPLIANCE

BREEAM 2014 is an environmental performance standard against which new, non-domestic buildings in the UK can be assessed, rated and certified. The primary aim of the scheme is to improve the environmental performance of non-domestic buildings in a robust and cost effective manner. The performance of the building on the scheme is quantified by a number of individual measures and associated criteria stretching across a range of environmental issues including waste.

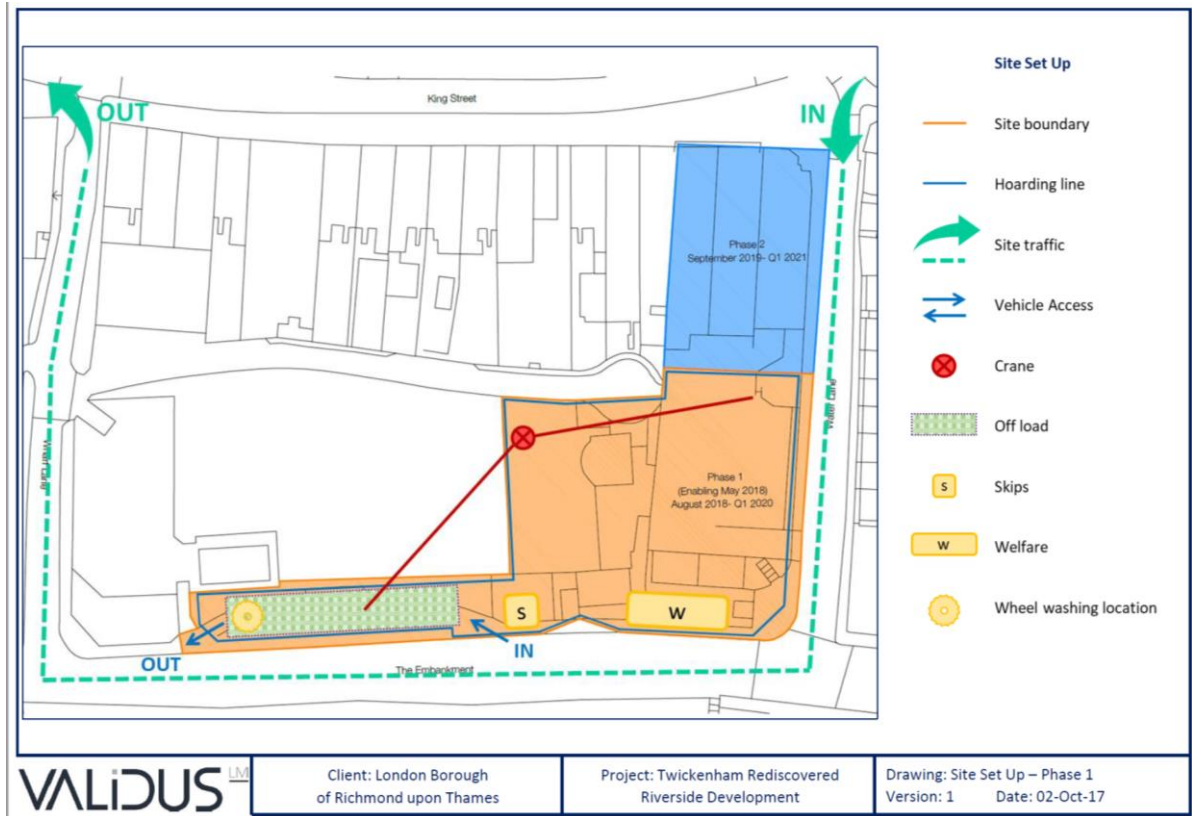
Price & Myers has been commissioned to carry out a BREEAM 2014 New Construction Shell and Core Pre-Assessment for the Twickenham Riverside development. The report demonstrates that the building has the potential to achieve a score of 71.83%, which equates to an Excellent BREEAM rating. In the waste section, there is a total of 8 credits available with 5 targeted.

The following table details the BREEAM credits assessed under the scheme in the waste section and whether they will be targeted for the development.

Criteria	Available Score	Status	Target Score	Pre-Assessment Stage Assumptions	Responsibility
<b>Waste</b>					
<b>Wst 01 Construction Waste Management</b>					
A Resource Management Plan (RMP) is developed and the amount of waste generated per 100m <sup>2</sup> = 13.3m <sup>3</sup> / 11.1 tonnes	1.06	Targeted	1.06	A pre-demolition audit will be carried out by the Demolition Contractor to maximise the recovery of material from the demolition.	Contractor
Amount of waste generated per 100m <sup>2</sup> = 7.5m <sup>3</sup> / 6.5 tonnes	1.06	Potential	0.00	A compliant RMP will be developed and the main contractor will be expected to ensure construction waste does not exceed 13.3m <sup>3</sup> / 11.1 tonnes per 100m <sup>2</sup> floor space.	
Amount of waste generated per 100m <sup>2</sup> = 3.4m <sup>3</sup> / 3.2 tonnes	1.06	Not Targeted	0.00		
Waste diverted from landfill - Non-demolition 70 / 80% or demolition 80 / 90%	1.06	Targeted	1.06	They will also be expected to divert waste from landfill to achieve the last credit. Further review will be required once the contractor is appointed and final details of the landscaping are confirmed.	
<b>Wst 02 Recycled Aggregates</b>					
The total amount of recycled and/or secondary aggregate specified is >25% (by weight or volume) of the total high-grade aggregate specified for the development. See Appendix G1 for full details	1.06	Potential	0.00	The total amount of recycled and/or secondary aggregate specified will be greater than 25% (by weight or volume) of the total high-grade aggregate specified for the development. (FFA or GGBS are classed as secondary aggregate).	Contractor / Structural Engineer
<b>Wst 03 Operational Waste</b>					
Provision of labelled dedicated storage facilities for a building's operational-related recyclable waste				There is 1,384m <sup>2</sup> of new build space. Therefore an 8m <sup>2</sup> space will be provided for the storage of recyclable waste.	Architect / Contractor
Appropriate capacity to the building type, size and number of units (if relevant and predicted volumes of waste. Sized either to meet known waste or 2m <sup>2</sup> (4m <sup>2</sup> if catering provided) for every 100m <sup>2</sup> of floor area	1.06	Targeted	1.06	There will also be a vessel(s) for composting suitable organic waste resulting from the building's use or if sorted off site, a suitable storage space.	
Where significant food waste is produced, composting facilities are provided and where significant packaging waste, a compactor/baler is provided					
<b>Wst 05 Adaptation to Climate Change</b>					
A Climate Change Adaptation Strategy Appraisal for the structural and fabric resilience will be undertaken by the end of Concept Design (RIBA Stage 2 or equivalent) .					Architect
Carry out a systematic (structural and fabric resilience specific) risk assessment to evaluate the impact on the building over its projected life cycle from expected extreme weather conditions arising from climate change and, where feasible, mitigate against these impacts.	1.06	Targeted	1.06	A Climate Change Adaptation Strategy Appraisal for structural and fabric resilience shall be undertaken by the end of Concept Design Stage 2. A systematic (structural and fabric resilience specific) risk assessment to identify and evaluate the impact on the building over its projected life cycle from expected extreme weather conditions arising from the climate change and, where feasible, mitigate against these impacts	
See Appendix G2 for details.					
<b>Wst 06 Functional Adaptability</b>					
A building-specific functional adaptation strategy study has been undertaken by Concept Design (RIBA Stage 2 or equivalent). This could include: Potential for major refurbishment including replacing facade / major plant, change in working practices, change in use and accessibility to data infrastructure.					Architect
AND Functional adaptation measures have been adopted in the design by Technical Design (RIBA Stage 4). See Appendix G3 for details.	1.06	Targeted	1.06	A functional adaptation strategy will be developed by the Concept Design Stage 2. This will include recommendations for measures to be incorporated to facilitate future adaptation.	
				The functional adaptation measures will be adopted in the design by the Technical Design stage in accordance with the functional adaptation strategy recommendations, where practical and cost effective.	

## 11 SITE LAYOUT PLAN

The following plan shows the indicative site setup as presented in the Construction Management Plan. Once a contractor has been appointed, a more detailed plan will be developed.



## 12 MATERIAL EXCHANGES AND REUSE NETWORKS

### 12.1 Materials Exchange

A materials exchange lists one organisation's surplus resources, and makes them available for use by another, either for sale or free collection. This may encompass a wide range of sometimes surprising materials, perhaps difficult wastes that may not have recognised markets, brokers or dealers.

An Exchange actively promotes reduction of waste, energy and pollution, and offers great potential for reducing use of virgin resources. It stops useful materials going to landfill, while increasing profitability. Benefits to those who use the exchanges include reduced disposal costs, lower purchase costs, and a positive image by creating benefit to society as a whole through redistributing resources and materials to where they are most beneficial.

Records of any materials exchanged should be kept in the SWMP.

## **12.2 Reuse Network**

Reuse Networks offer a cost effective, multi-beneficiary solution to a significant waste problem by turning unwanted electrical items and furniture into a resource with value and diverting them from the clutches of landfill through redistribution to end users throughout the UK and abroad.

The use of reuse networks could prove financially advantageous when stripping out buildings prior to demolition work being undertaken.

A record of items reused should be kept in the SWMP.

In all cases, Duty of Care checks should be made. Some organisations may be exempt from the requirement for Carriers registrations and have sites which are exempt from the requirement for exemptions.

## **13 REGISTRATIONS, PERMITS, EXEMPTIONS AND VALIDATION CHECKS**

### **13.1 Hazardous Waste**

Sites producing hazardous waste will need to register with the Environment Agency as a 'Producer' of hazardous waste. Details of how to register along with an application form are available at:

<http://www.environment-agency.gov.uk/business/topics/waste/32198.aspx>

Alternatively the Buyer may have already registered the site and should forward the information to the site.

When the site's Hazardous Waste Producer Registration Document is received from the Environment Agency it should be placed in this section of the SWMP.

### **13.2 Waste Carriers**

All waste removal companies, including project sub-contractors removing their own waste from site must be registered waste carriers. Copies of their Waste Carrier Registration Certificates must be obtained and filed within this section of the SWMP.

### **13.3 Permits and Exemptions**

The Environmental Permitting Regulations require that a premise receiving / treating waste must either hold an Environmental Permit or be registered exempt from permitting requirements. The Environmental Permitting Regime replaces the previous Waste Management Licence and Pollution Prevention Control (PPC) Regimes. Waste Management Licences and PPC Permits obtained prior to the introduction of the regulations in April 2008 automatically became Environmental Permits. Copies of such documentation along with details of permitted waste types must be requested from service providers prior to the use of their services and filed within this section of the SWMP.

#### 13.4 Validation Checks

All Waste Carrier Registrations and Environmental Permits should be checked to ensure they are valid by logging on to the EA website:

<http://www2.environment-agency.gov.uk/epr/search.asp?type=register>

Exemptions can be verified via email to the Environment Agency's Duty of Care Team at

[dutyofcare@environment-agency.gov.uk](mailto:dutyofcare@environment-agency.gov.uk)

In both cases, evidence should be printed out and kept in this section of the SWMP.

Registrations, permits and exemptions can also be verified by phone through contacting the Environment Agency's Duty of Care Team on 0870 850 6506. This option should only be considered as a last resort and evidence of validity must be requested in the form of an email or facsimile to be included in this section of the SWMP.

Duty of Care Audits may be carried out during the project. Any waste contractor removing waste from site which is considered as high risk and where there are suspicions that it is not being handled in compliance with the Duty of Care (e.g. muck away due to large quantities or hazardous waste) should be followed to ensure they are taking the waste to the correct destination. If possible during visits to waste facilities, checks should be made that waste is being recycled/ disposed of in accordance with specified methods. A separate file/s may be used for storage of Carriers Registrations, Permits/ Exemptions and EA checks with the Duty of Care Schedule.

#### 14 WASTE TRANSFER DOCUMENTS

There are two types of documentation controlling the transfer of waste from site. They are **Waste Transfer Notes** (for non-hazardous wastes) and **Hazardous Waste Consignment Notes** (for hazardous wastes).

Waste Transfer Documents show carriers and site operators who handle site waste what they are dealing with so that they can manage it safely and legally. No waste should ever leave site without either document in place.

NOTE: Copies of all Waste Transfer Notes must be kept for at least two years and Hazardous Waste Consignment Notes for three years. They should be readily available upon demand for inspection by the Environment Agency or Local Authority.

#### 15 SITE WASTE DATA

The Building Manager must ensure that all waste materials leaving site, including those managed by sub-contractors, are recorded on the 'Waste Data Sheet' worksheet.

Requested recycling performance reports generated by Waste Management Service Providers should also be kept in this section of the SWMP.

## **16 REPORTING**

The SWMP must be updated as often as necessary and at a minimum frequency of six months. Six monthly reviews will be carried out by the Environmental Manager for the contractor. All reports produced, including external reports by the Environment Agency / Local Authority should be filed in this section of the SWMP.

## **17 FINAL REPORT AND REVIEW**

Within one month of the end of the project, the Building Manager should submit a Completion Report to review the information collected during the Site Waste Management Plan process. The completion report should include the following sections:

- Confirmation of implementation of the plan
- Comparison of predicted and actual wastes
- Lessons Learnt
- Estimation of cost savings