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Revision History					
Revision Number	Description of change	Date of Review	Reviewed By	Reviewed By	Approver
2	Addition of pest control management for scrap yards Update of personnel	16/03/2023	H.Powell	J.Richards	H.Powell
3	Overall review of procedure due to new shredder plant operation Update of Personnel	04/09/2023	H.Powell	A. Dorca	H.Powell

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## Key Contacts

Name	Title	Email	Tel:
Hannah Powell	Environmental Manager	hannah.powell@celsauk.com	07483 062 878
Hannah Mayled	Environmental Advisor	hannah.mayled@celsauk.com	07483 016 324
Chris Griffiths	Shredder Operations Manager	chris.griffiths@celsauk.com	07841 497 541
Ryan Connick	Scrap Operations Manager	ryan.connick@celsauk.com	07483 018 945
Kathryn Bradshaw	Scrap Handling Manager	kathryn.bradshaw@celsauk.com	07739 856 626
Craig Sander	Circular Hubs Manager	craig.sander@celsauk.com	07918 738 848
Alba Perez	Scrap Support Manager	alba.perezgestal@celsauk.com	07483 018 800
Andreu Dorca Duch	Head of Scrap Purchasing	andreu.dorca@celsauk.com	07483 019 166
Andy Stratford	EcoPro Manager	andy.stratford@ecopro.co.uk	07802 250 249
Dan Unett	EcoPro Treatment Operative	-	07742 474 145

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## 1.0 Objective

This procedure has been developed to provide internal guidelines detailing the requirements for correct management of scrap stockpiles in order to prevent pest populations reaching a level where they become a nuisance to the local community.

## 2.0 Background


In 2019 CELSA UK started purchasing tin cans as a source of scrap metal. Recycling tin cans allows the company to generate 'Packaging Return Notes' which can be sold to participants of the Government's 'Packaging Waste Return' scheme, who need to offset the use of metal packaging in their products. The stockpiles were not correctly managed, resulting in a major fly infestation on site which spread to households in the local community. This resulted in a large quantity of complaints and ultimately being investigated by Natural Resources Wales, who put a temporary stop on any incoming tin can deliveries until the situation was under control.

Following on from this incident, CELSA has a standing agreement with Natural Resources Wales on how the stockpiles of tin cans are managed on site moving forward:

- Tonnage on site must not exceed 6,000t during the summer months (at CELSA's Cardiff Meltshop site)
- Stockpiles should be treated regularly to keep fly populations under control

## 3.0 Scope

This procedure refers to the Scrap Bay area of the Melt Shop and the stockpiles located at the Shredder Plant - Environmental Permit EPR/TP3639BH, and all tin can stockpiles stored at CELSA Recycling Sites with Environmental Permits Swansea - AB3891FT, Bristol - WE8144AA, Rotherham - WE4947AA and Sunderland - EPR/LB3706FR.

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## 4.0 Responsibilities

The responsibilities of each task to ensure full deployment and adherence to this procedure is detailed below in a RACI table and described further underneath.

- Responsible** – the person who does the task,  
**Accountably** – who is ultimately accountable  
**Consulted** – people who have a say in how the task is done or should be done  
**Informed** – people who are given the output

Note:- Only one person can be accountable for a task, multiple can be responsible, the same person can be accountable and responsible for the task. An accountable person can delegate responsibility but not the accountability.

	Scrap Handling Manager/Circular Hubs Manager	Environment Manager	Scrap Support Manager	Technically Competent Manager	Regulatory Authority
Management of stockpile volume remains below the 6000t limit - at Cardiff Scrap Handling site.	A&R				
Manage stockpile levels to ensure the pest control level is effective – at all Circular Hub operations.	A&R				
Ensure that the stockpiles are treated as per Section 5.0 of this document, to prevent nuisance pests.	A&R				
Daily audits and ensuring the effectiveness of the control measures	A&R	I	I		
Inform the Environment Manager of any noticeable increase in pest activity and corrective actions taken to address this.	A&R	I		R	
Investigating on site pest management issues and feeding back information to the Environment Manager.	A&R	I			
Responding to any complaints from local sensitive receptors and follow CELSA's internal communications procedure – CPB033 EHS Communications.	C	A&R	I		

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Communicating with the relevant regulatory authority regarding information that is relevant to the Environmental Permits.		A&R			I
Raising any incidents and hazards relating to pest activity in the areas of their responsibility on ProSafety.	A&R	R	R	R	
Managing the incoming overall stock of tin, in such a way that the pest control measures remain effective.	A&R		I		
maintaining ECP 59 – Tin Can Stockpile Management Procedure and communicating it to the relevant CELSA employees.		A&R	I		
Deployment this document, ECP 59, within their operational teams.	A&R		I		


- The Scrap Handling Manager is responsible and accountable for managing the stockpile volume remains below the 6000t limit - at Cardiff Scrap Handling site.
- The Circular Hubs Manager is responsible and accountable for managing the stockpile levels to ensure the pest control level is effective – at all Circular Hub operations.
- Scrap Handling Manager (Meltshop) and Circular Hubs Manager (Circularity) are accountable and responsible for ensuring that the stockpiles are treated as per Section 5.0 of this document, to prevent nuisance pests.
- Scrap Handling Manager and Circular Hubs Manager are accountable and responsible for daily audits and ensuring the effectiveness of the control measures, where they are found to be ineffectual, they are accountable and responsible for undertaking a corrective action, such as, increasing the frequency of pest control management.
- Scrap Handling Manager and Circular Hubs Manager must inform the Environment Manager of any noticeable increase in pest activity and corrective actions taken to address this.
- The Scrap Handling Manager and/or Circular Hubs Manager are responsible for investigating on site pest management issues and feeding back information to the Environment Manager.
- The Environment Manager are responsible for managing and responding to any complaints from local sensitive receptors and follow CELSA's internal communications procedure – CPB033 EHS Communications.
- The Environment Manager is responsible for communicating with the relevant regulatory authority regarding information that is relevant to the Environmental Permits.

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- Scrap Handling Manager and/or Circular Hubs Manager are accountable and responsible for raising any incidents and hazards relating to pest activity in the areas of their responsibility on ProSafety.
- Circular Hubs Manager is accountable and responsible for managing the incoming overall stock of tin, in such a way that the pest control measures remain effective.
- The Environment Manager is accountable for maintaining ECP 59 – Tin Can Stockpile Management Procedure and communicating it to the relevant CELSA employees.
- The Scrap Handling Manager and Circular Hub Manager is accountable and responsible for deploying this document, ECP 59, within their operational teams.

## 5.0 Policy For Management Of Pests


- Tin can stockpiles are to be inspected daily in line with the requirements of section 6.0 of this document.
- Tin can stock volume will be managed to remain below 6000t for the Meltshop scrap management areas, during the summer months i.e. March - October.
- Tin can stock volume will be managed to remain below 10,000t for the Meltshop scrap management areas, during the winter months i.e. November - February.
- A contract for pest control must be set up for treatment of tin can stock throughout the year with a focus on the summer months (March to October). This will include flytraps around perimeter of the scrap bays and spraying of stock piles with insecticide.
- During the summer months stockpile treatment will be carried out 3 times a week using insecticide.
- During the winter months stockpile treatment will be carried out once a month using insecticide.
- Daily inspection of pest levels are to be carried out by scrap inspectors at the Meltshop and part of the Scrap Yard Managers daily checks at the recycling yards. If increased pest levels are evident then ad hoc treatment measures will be arranged as soon as possible, equally if there is no evidence of pests the frequency can be reduced during the winter months.
- Stockpile level management is discussed on a daily basis by scrap handling team in the Scrap Evolution Daily Meeting.
- Contracted pest control company will issue a site visit report, with a semi quantitative assessment of fly number based on fly trap activity after each visit.
- Stockpile level management at scrap yards is monitored during daily checks and a weekly meeting.
- Where possible, tin can stock must be stored under cover, out of direct sunlight and the stockpile must not be more than 4 meters in height.

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- Oldest tin can stock must be consumed first. New stock should not be deposited on top of existing old stock to promote stock turnover, and prevent existing eggs and associated fly activity spreading to new stock.
- All unsuitable wastes that can lead to increased pest activity will be rejected from site in line with CELSA's Scrap Standards Agreement and CRUK-SWP-OPS-002-01 Scrap Inspection.
- The Circular Hub Manager and Scrap Handling Manager are accountable and responsible for the deployment and training of the requirements of this Environment Control Procedure, this will be made available on CELSA's internal document control system.

## 6.0 Procedure for Pest Control Management

Task No.	Action	Comments
1	Daily inspection of stockpile  Approximately midday carry out visual inspection of tin can stockpile.	Note – this needs to be carried out from within 1m of the stockpile along the accessible perimeter of the entire tin can stockpile to determine if pests are present.
2	If level of flies are above the Pest Level 1 go to Task No. 3 If above Pest Level 2 go to Task No. 4	Pest Level 1 - Visible increase of number of flies but not to extent where it is a nuisance to inspector. (If 1 rodent is visible during daylight hours this is Pest Level 1)  Pest Level 2 - Visible increase of number of flies causing a nuisance to the inspector. (If multiple rodents are visible during daylight hours this is Pest Level 2)
3	Inspector has deemed Pest Level 1 has been met, then confirm next Pest Control site visit is within the next 2 days	If Pest Contractor is not visiting within the next 2 days, then arrange additional visit.
4	Inspector has deemed Pest Level 2 has been met, then confirm next pest control site visit is happening either that day or the following day	If Pest Contractor is not visiting within the next 24 hours, then arrange same day visit.
5	Record observations from the visual inspection on the shift report	

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6	If either threshold is breached, inform the Environment team of any remedial actions taken.	Contact Details – see above
7	In the event of a pest incident, where numbers of flies or rodents become unacceptable, - contact the weigh bridge team and scrap purchasing to stop incoming materials.	In the event the above controls fail to control the pest development, - and that levels have reached an unacceptable nuisance, then all incoming tin can deliveries are to be stopped until the nuisance has been controlled.

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## 7.0 Procedure for Tin Can Stockpile Limit Control

Task No.	Action	Comments
1	Management to review current tin can stock levels on site in daily operations meeting.	Daily stock/site meetings in area to review acceptance of further tin can onsite.
2	<p>Scrap Handling Manager / Team leader to inform weighbridge operator if scrap levels are above target levels or if pest levels are not under control and deemed a nuisance during the daily inspection, to turn away any additional deliveries.</p> <p>Scrap Yard Manager to prioritise tin can stock to be sent to the Meltshop if levels are deemed too high.</p>	<p>Site Stockpile limit 6000t during summer months (March - October)</p> <p>Site Stockpile limit 10,000t during winter months</p>
3	Scrap Handling Manager / Circular Hub Manager to inform Scrap Support Manager of exceedance of manageable stock limits and no more stock to be accepted on site until stock is consumed and within control limit.	<p>Scrap Handling Manager to inform Scrap Support Manager when stock levels have dropped below stock limit by minimum of 500t – Cardiff site</p> <p>Scrap Yard Manager/Scrap Yard Operations Manager to inform Scrap Support Manager when stock levels are back within control.</p>

## 8.0 Records

- Post visit reports are completed by the contractor responsible for stockpile treatment. These should be sent to the Scrap Handling Team and Circular Hub Team, with the Environment Department copied in for reference.
- The scrap evolution daily report records the tonnage of tin cans on site each day. This will be used for evidence of agreed stockpile limits being maintained, and for discussion in daily scrap meetings to assess if any intervention needs to be made.
- Scrap Yard Managers carry out daily environment checks and escalate any concerns to the Circular Hub Manager.



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- Technically Competent Manager (TCM) site visits and reports are produced weekly and all issues identified are reported to Scrap Operations Team and Environment Team.

## 9.0 Documentation

- 9.1 Scrap evolution daily report – Scrap Handling Team (Cardiff only)
- 9.2 Contractor weekly site visit report – Pest Control Contractor
- 9.3 Site Environment Daily Checks – Scrap Yard Manager
- 9.4 Daily Stock Check Report – Scrap Yard Manager
- 9.5 Weekly TCM Reports – Scrap Yard Manager / CIWM Contractor
- 9.6 ECP40, ECP48, ECP54, ECP56, ECP45, ECP62 - Location of stockpiles and nearby receptors
- 9.7 ECP 59 – Reviewed annually in consultation with the operational team to ensure its effectiveness. In the event of a founded complaint, ECP 59 will be reviewed in line with the investigation findings to improve controls.