

Fishguard Linkspan Replacement

Appendix F – Site Waste Management Plan



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1. Introduction

This plan defines the controls and mitigation measures for the effective management of waste and raw materials during the construction works at the Port of Fishguard. It aims to ensure best practice and full compliance with Stena Line requirements, current legislation, and McLaughlin & Harvey's environmental management systems and policies.

The plan will be treated as a live document and updated as necessary throughout the project to reflect changes in scope, legislation, or company procedures. All contractors and subcontractors engaged on behalf of Stena Line or McLaughlin & Harvey are required to comply with this plan for the duration of the works.

Revisions to this document will be issued via the project document management system and communicated to all relevant personnel and stakeholders.

Typical construction waste streams are expected to include concrete washings, formwork timber, reinforcement offcuts, and packaging materials associated with site operations. The waste hierarchy, as outlined below, will be applied throughout to minimise waste generation and maximise reuse and recycling opportunities.

All works will be undertaken in accordance with the following key legislation and guidance:

- Revision of the Port Reception Facilities Directive (2019/883)
- Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003
- Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) (Amendment) Regulations 2009
- MSN 1678 Special waste regulations 1996
- MGN 563 Amendment 1, MGN 631, MGN 632, 2016 Amendments to MS (Port Waste Reception Facilities) Regulation 2003

2. Reducing Waste

Where practicable, steps will be taken to avoid the production of waste. For example, the use of reusable water bottles, crockery and cutlery in the welfare facilities will prevent the need for single use plastics. Where practical, requests should be made to suppliers to minimise packaging. Similarly, ordering the correct quantity and types of materials will prevent unused excess materials being disposed of as waste.

3. Reuse

Where practicable, materials arising from the construction process will be reused on site to minimise waste generation, reduce disposal volumes, and conserve natural resources. Reuse opportunities will be identified and reviewed throughout construction as part of the ongoing waste management process.

Examples include:

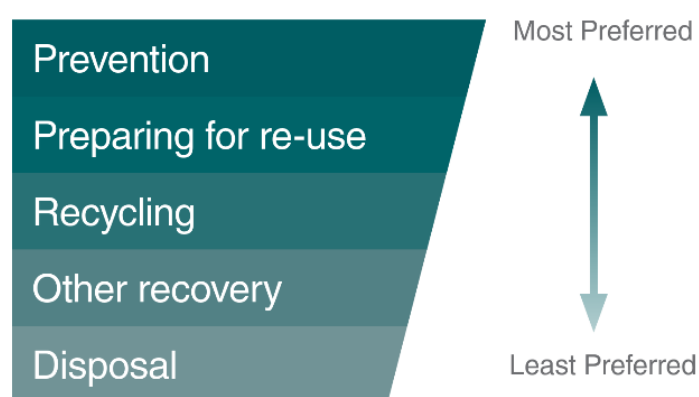
- **Formwork timber and shuttering** – will be cleaned, inspected, and reused wherever feasible on subsequent pours or temporary works.
- **Aggregates and excavated materials** – where suitable and approved by the Engineer, may be reused as backfill or sub-base material within the works.
- **Packaging materials** – such as pallets, cable drums, and containers, will be returned to suppliers for reuse where take-back schemes are available.
- **Steel reinforcement offcuts** – may be retained for fabrication of small components or spacers, reducing off-site disposal.

4. Recycle

Recycling will be facilitated by the segregation of waste. Clearly marked and labelled waste receptacles will be provided in designated areas. Waste suitable for recycling are likely to include wood, metals, glass, paper, plastics and oils.

5. Waste Hierarchy

We will ensure to follow the waste framework directive and adopt the waste hierarchy approach as illustrated below.



Waste Framework

The key principles of the waste management hierarchy can be identified as:

- Prevention and minimisation of waste is the preferred option;
- Where construction waste is generated, it should be source separated to facilitate recycling and maximise diversion of waste from landfill;
- Where commercial waste is generated, it should be source separated to facilitate recycling and maximise diversion of waste, including biodegradable waste, from landfill;
- Where waste may not be prevented or recycled it should be transported and disposed of in accordance with applicable legislation and without causing environmental pollution;
- Waste may only be transferred by a waste collection permit holder and delivered to an authorised waste facility.

To reduce the amount of waste produced the following best practice should be incorporated into procedures:

- Ensure building materials ordered are the correct size.
- Order the appropriate volume of materials.
- Return excess materials to the supplier if possible or advertise them to other projects within the Company.
- Avoid ordering new materials if there are existing materials available or able to be adapted to the task within the Company.

6. Waste Monitoring

The McLaughlin & Harvey Environmental Advisor will carry out regular waste compliance audits and review details of waste arisings to identify areas for opportunity to reduce or recycle more wastes in conjunction with the Site Manager.

7. Waste Management

Waste receptacles (bins and skips) will incorporate lids or covers to protect against vermin gaining access and wind blowing wastes out of skips, giving rise to litter.

We will put in place procedures for ensuring that appropriate records are kept for all waste arisings including volumes, categories and waste carriers used, and that waste transfer notes are retained.

8. Estimated Waste Production

The following is the forecasted waste outputs and embodied carbon associated with waste management, as generated via the Construction Waste Portal.



The portal's predictive analytics tool estimates not only the anticipated tonnes of waste across material streams but also the embedded carbon emissions related to waste handling, transport, treatment, and disposal. These figures help inform more sustainable decisions, enabling the project team to set realistic targets, benchmark performance, and monitor deviations over the course of construction. The data herein should be treated as a baseline and will be refined as actual waste records are collected, compared, and reconciled during delivery.



Source: <https://www.constructionwasteportal.com/>

**Please note that this includes only construction waste, no earthworks or demolition waste. Therefore, this may change as the project progresses.*

9. Management of Waste Streams on Site

Concrete

Cement washing will be carried out in a dedicated area. Concrete lorries will only be permitted to wash their shoots on the site. Washing arisings will be collected for onsite treatment. This will include settlement and, if required, pH correction. The liquids will be reused on site as grey water if suitable (to wash equipment), or disposed of via a consented discharge onsite route, if available. Alternatively, they will be tankered off site for disposal. The solids will be disposed of as solid waste.

Metals

All waste metal such as off-cuts of rebar metals will be stored in a designated skip and collected for recycling by the licenced waste contractor. Metal materials will be carefully managed to reduce the environmental risks and to minimise the costs.

Wood/Timber

Timber waste will be kept to a minimum through re-use throughout the project. Any timber that cannot be reused because of poor quality, etc. will be segregated and stored for recycling in a skip.

McLaughlin & Harvey have also engaged with community wood recycling scheme which collects waste timber and processes it under waste exemption for further recycling or reuse.

These materials will need to be handled carefully onsite to prevent dampness, warping of the wood and fungal attack.

Paper & Cardboard

Office paper will be collected in the recycling bin and will be collected by the licenced waste contractor for recycling as necessary.

Packaging/Mixed Recycling

Where possible, packaging will be segregated for recycling or returned to the supplier. Almost all materials delivered to the construction site will be wrapped and protected by packaging material e.g. plastic film, wooden pallets, cardboard, metal wrap, cellophane wrapping, Styrofoam etc. It is important that packaging material is managed efficiently to ensure that the site remains free of windblown and discarded packaging material.

Canteen Waste / Domestic Non-Hazardous

A licensed external waste disposal contractor, as required, transports this waste to a licensed tip. Labelled containers will also be provided for gathering plastic bottles, etc. at the main compound.

It is proposed that canteen waste will be segregated into different waste types: organic, recyclable & general. These three waste types will be disposed of separately by use of colour coded bins in the canteens and through separate skips and bins in the waste area at the compound. McLaughlin & Harvey intend to reduce the amount of waste in canteens by using reusable drinking cups, crockery and cutlery.

Glass and Other Materials

There will not be much glass used in construction, but there may be occasions when glass would be delivered through these works to other parts of the project.

Each waste type will be segregated into clearly marked separate waste skips for collection. McLaughlin & Harvey will sub-contract a suitable licenced waste contractor to collect the wastes for recycling and disposal on an as required basis.

Hazardous waste

Hazardous waste such as contaminated material like absorbents, cartridges, waste oil filters, chemicals, etc, will be stored in individually labelled containers and collected by the licensed contractor, as necessary.

Waste oil stored onsite will follow the guiding principles contained within EA GPP 8 'Safe storage and disposal of used oils'. The storage of waste oil will also follow the guidelines contained within EA GPP 2 'Above ground oil storage tanks' and will not be located within 10 m of watercourse or 50 m of a spring. The waste oil tank will either be double skinned or contained within an impermeable bund with a capacity of 110% of the oil tanks.

Waste Management Contractors, Record Keeping and auditing Protocols.

All Waste Management Contractors, employed direct or through a sub-contractor, will be appropriately licensed to remove and transfer or treat the material sent to them.

Every contractor used will have McLaughlin & Harvey's Waste Contractor Requirements sent to them with their order. This document is also circulated to any subcontractor removing waste from site. This ensures that all aspects of the Waste Duty of Care are adhered to and that disposal routes are traceable and representative of best practice.

For all waste contractors employed by McLaughlin & Harvey, we require the following:

1. Upon receipt of an order and before starting work, the waste contractor is required to send an electronic copy of their Waste Carriers Licence and all Waste Management Licences, Environmental Permits and Exemptions which will be used in relation to the site(s) which they are servicing. This should be emailed to ems@mclh.co.uk
2. A completed Waste Transfer Note which includes all of the details required by the Waste (England and Wales) Regulations 2011. Note this includes all of the following details as a minimum
 - The name and address (including postcode) of the project site and waste contractor;
 - The date and time of the transfer;
 - Description of the waste;
 - Description of the waste container;
 - Identify the waste being transferred by reference to the appropriate six-digit code in the European Waste Catalogue;
 - SIC code for McLaughlin & Harvey - 42990 for civil engineering projects;
 - The waste management licence number, exemption number or permit number of the destination site and regulation authority with whom the waste contractor is registered;
 - Signature from a representative of the waste contractor and project site.
3. For any scheduled collections e.g. wheeled bin or FEL/REL uplifts or soil/stone/excavation spoil collections via tippers, a Season Ticket Waste Transfer Note is required to cover all uplifts by the waste contractor. Season Ticket WTNs require all of the information required in (2) above but must also state the date from which collections commence to when they will finish, for a period of up to 1 year. Should collections be required for longer than 1 year, a new season ticket must be generated annually.

4. A report must be provided by the waste contractor to McLaughlin & Harvey head office detailing all waste movements from each of our sites handled by the waste contractor, including the following details:
- Date and location of transfer;
 - Waste Transfer Note number applicable to each movement;
 - Type of waste including EWC code;
 - Container size and type used;
 - Tonnage of waste;
 - Destination facility/site of waste;
 - Recycling percentage;
 - Direct reuse percentage, where applicable;
 - Energy from waste percentage, where applicable;
 - Landfill percentage, where applicable.

This report must be provided on a monthly basis no later than 2 weeks after the reporting period, or more frequently where reasonably requested by McLaughlin & Harvey.

The reports should be emailed to: ems@mclh.co.uk

These records will be retained on site in order that they can be inspected at any time to ensure that they are complete. Reporting on waste and the compiling of project data is carried out at Head Office. Records are kept for the statutory minimum of 2 years (non-hazardous waste) or 3 years (hazardous waste).

Waste traceability and the recording of movements in line with Duty of Care is included in internal SHEQ / Environmental Audits in order that any shortcomings are highlighted in a timely fashion and any deviations corrected immediately. Documents are quality checked on a continuous basis by the site team and as part of the Environmental Team's monitoring and recording system.

10. Asbestos Management on Site

According to the Asbestos report carried out in February 2025 by ESP Environmental Ltd, nine works areas within the site were assessed. Chrysotile (white asbestos) was detected in cement arc arrestors within the DC panels and in gaskets in the old generator room in the substation area and Amosite (brown asbestos) was detected in duct lagging associated with the old generator exhaust. Any asbestos that is found will be reported to the site manager and dealt with immediately. Any ongoing work will cease to avoid further exposure, and appropriate measures will be taken.

The following outlines the management controls, monitoring arrangements, and mitigation measures that McLaughlin & Harvey will implement to ensure that any asbestos-contaminated materials are properly identified, handled, and disposed of in full compliance with current legislation and best practice, including the Control of Asbestos Regulations 2012.

Certifications and Training: We will ensure that all personnel who may come into contact with asbestos are adequately trained, competent, and medically fit to undertake such works.

Records of training, certification, and competency will be maintained and made available to CMAL upon request. Only trained operatives will be permitted to handle or supervise asbestos-related activities.

Protective Equipment: We will provide and enforce the use of appropriate Personal Protective Equipment (PPE) to prevent exposure during all asbestos-related operations. PPE requirements will be defined within task-specific risk assessments and method statements.

Disposal Procedures: Where pile arisings or excavated materials are identified or suspected to contain asbestos, we will ensure their safe handling, containment, and disposal via an appropriately licensed waste carrier to an authorised hazardous waste facility. If visible fragments of asbestos-containing material (ACM) are present, the entire waste stream will be classified as hazardous waste. Prior to disposal, all materials will be inspected, identified, and segregated to prevent cross-contamination.

Where wet sediments are encountered, treatment or drying may be required to meet landfill acceptance criteria. During temporary storage, on-site treatment, and transport, we will implement strict controls to prevent runoff to the river and minimise dust generation. All activities will comply with the project's Waste Management Plan and Environmental Permit requirements.

Documentation and Record Keeping: We will maintain comprehensive records of all asbestos-related findings and management actions, including sampling results, waste transfer notes, and disposal documentation. Residual asbestos risks will be clearly communicated within the Health and Safety File, which will include details of any known contamination or hazardous materials encountered.

Protection of the public: To prevent contaminated soils from affecting the public we will follow our dust mitigation plan to prevent any dust generation during transportation.

Watching brief: Our site manager will keep a site diary documenting each phase of remediation, they will ensure it is kept up to date, have efficient information and photographs.

Monitoring and Review: We will regularly monitor and review asbestos management arrangements throughout the construction period to ensure ongoing compliance and effectiveness. Site inspections, audits, and toolbox talks will be undertaken to verify that control measures remain appropriate and that all personnel continue to follow safe working practices.

Any changes in site conditions, work methods, or identified contamination will trigger a review and update of this plan. All revisions will be issued through the project document management system and communicated to all relevant parties to maintain full awareness and control of asbestos-related risks.