

ENVIRONMENTAL PLAN

Litter Management Plan

EP - 02

1. PURPOSE

To ensure that emergency planning is in place to reducing risk of incidents and to minimise the risk of harm to employees, third parties and the environment.

2. SCOPE

This Management Plan provides guidance on the appropriate preparation for, and response to, foreseeable incidents arising from Natural UK’s Healthcare Waste Management Facility (HWMF) activities. Natural UK Ltd acknowledges its legal duties to control and manage any harmful emissions that could arise as part of its day to day activities under part III of the Environmental Protection Act 1990, in respect of statutory nuisances.

3. RESPONSIBILITIES

The following personnel hold primary responsibility for ensuring that the requirements of this procedure are met. General responsibilities are summarised below:

| Action | Responsibility |
|--|---|
| Ensuring that environmental response plans and equipment are in place on site. | Managing Directors Technically Competent Manager |
| Ensuring that staff have received appropriate training | Managing Directors Technically Competent Manager |
| Support and liaison | Managing Directors Technically Competent Manager |
| Completion of Weekly Environmental Checks | Operations Supervisor |
| Prompt reporting of environmental incidents | All |
| Reviewing environmental incidents for learning points | Managing Directors Technically Competent Manager |

In certain instances, designated personnel may deputise for the Managing Director and or the Technically Competent Manager. In general, these deputies should operate within the same organisational functions as those with primary responsibility for the activity concerned. Natural UK, Natural Healthcare, NappiCycle staff frequently work on other companies sites and locations all staff must comply with those sites regulations and procedures all of the time.

4. REFERENCES

- QMS -01 Working Plan
- QMS -06 Non-Conformance Reporting
- QMS -11 Health & Safety
- QMS -14 Management Systems Review
- EP -09 Emergency & Incident Response Plan
- Weekly Environmental Inspection Report

5. INCIDENT PREPAREDNESS

The Technically Competent Manager (TCM) is responsible for ensuring that adequate preparation has been made both to minimise the risk of incidents and to allow adequate emergency response. These measures shall include:

Periodic review to ensure that response capability is at the desired level.

The TCM will use the results of this exercise to identify requirements (training, equipment, etc) for his site. These requirements will be communicated to Management, who will put them in place, with the assistance of the Health and Safety Manager as required. Sighting of any emergency equipment will take into account the most likely areas of its use on site, security and ease of access in emergency.

The TCM shall set up an Emergency Plan including organisation and responsibilities, general precautions, liaison with the emergency services, detection systems (where relevant) and environmental training.

Emergency call out numbers will be clearly displayed on each site. These will include:

- **Technically Competent Manager**
- **Health & Safety Manager**
- **Managing Directors**
- **The Natural Resources Wales (NRW)**
- **Health & Safety Executive**
- **Police Service**
- **Fire Service**
- **Ambulance Service**
- **First Aider(s)**
- **Spill Response contractor (if applicable)**

6. LITTER MANAGEMENT PROCEDURE

Natural UK must employ the appropriate measures necessary to prevent pollution or minimise it when prevention is not practicable. The measures outlined in this document are a direct result of a risk assessment carried out to determine the main risks and likely impacts during the course of Natural UK and Nappicycles activities.

The main risk area for generating litter is in the processing and output of materials from the NappiCycle process. After the waste has been treated and dried the waste has more potential to be dispersed.

Working on that basis to minimise the risk Natural UK will implement the following control measures:

Control Measures to minimise the risk of litter from Hazardous clinical waste transfer station and NappiCycle AHP waste treatment activities

- All machinery and plant that has potential to generate litter e.g. Granulators, pelletisers, driers to be fitted with air extraction and filtrations systems to minimise the generation of litter at source
- Floor surfaces, plant, equipment and storage containers should be cleaned regularly and free of any build-up of dry materials should they arise , preferably using vacuumation

- Wastes should be managed within the appropriate building on a sealed (dust free) impermeable surface.
- Access doors to buildings shall remain closed during processing/transfer operations.
- Waste storage bays should be emptied periodically to ensure waste residues are removed and the push walls and floor surfaces cleaned
- Loading of output materials into containers or bags should be carried out within the confines of the building as far as is practicable
- Output materials stored outside pending collection should be stored in sealed bags or covered containers to minimise the risk of dispersal of materials by the wind
- Periodic environmental checks shall be undertaken around the site and documented (weekly environmental inspections).
- Any windblown litter should be removed from external areas of the site and around the perimeter fence using specialist equipment or litter pickers.
- Incidence procedures are in place in order to act upon any nuisance, accidents, complaints or non-conformances (non-conformance /incident report)

7. RECORDS

All incidents raised must be recorded and reported to the Responsible Manager to enable the causes to be investigated and to undergo a root cause analysis. This should ensure the likelihood of a re-occurrence is minimised. Records shall be kept on an incident response form and kept on file.

Weekly Environmental Inspection will be carried out by the Responsible Manager, documented and filed. Issues raised may require remedial actions and these can be documented on this form. The form should be reviewed and countersigned by the TCM or Managing Directors when the issues have been actioned or resolved.