

	Document Reference	RMS 70	
	Document Title	Recycling and Waste Mgt Procedure	
	Author	Neil Eastwood – EHS Compliance Manager	
	Date Issued	1 st November 2016	
	Date for Review	1 st November 2018	
	Approved by	Glenn Evans – Group EHS Manager	
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1.1 Purpose

To define the processes by which waste is managed by all Noble Foods sites, covered under the scope of the Environmental Management System [See [Scope of the HS&E Management System](#) for details of the scope].

1.2 Scope

This procedure relates to the production, handling, keeping, safe storage, transport, collection and disposal of all waste generated on all Noble Foods sites.

The Duty of Care covers the:

- production
- import
- carriage
- storage
- treatment
- disposal

of hazardous and controlled waste i.e. clinical, domestic, commercial or industrial wastes. those listed above.

Waste types covered include but are not limited to:

- | | |
|---|--------------------------------------|
| • medical / sanitary waste | • waste from maintenance activities |
| • hazardous waste | • builders waste rubble |
| • waste oils and misc. engineering fluids | • paper |
| • lamps and fluorescent tubes | • cardboard/packaging/wood/tetra Pak |
| • food waste | • confidential waste |
| • toner cartridges | • redundant IT equipment |
| • other office waste | • metals |
| • scrap furniture | • waste electrical and electronic |
| equipment | |
| • TVs / monitors | • refrigeration & Air Con plant |
| • rechargeable batteries | |

The above list is not exhaustive but covers the main types produced, handled and disposed of within Noble Foods.

1.3 Definitions

Waste is defined in the Waste Framework Directive 2008 (2008/98/EC) and is transposed through the Waste (England and Wales) Regulations 2011. Waste is defined as....

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“any substance or object..... which the holder discards or intends to or is required to discard, or any substance or object.... included in the list below (Annex 1 of the Waste Framework Directive):

CATEGORIES OF WASTE

- Q1 Production or consumption residues not otherwise specified below
- Q2 Off-specification products
- Q3 Products whose date for appropriate use has expired
- Q4 Materials spilled, lost or having undergone other mishap, including any materials, equipment, etc, contaminated as a result of the mishap
- Q5 Materials contaminated or soiled as a result of planned actions (e.g. residues from cleaning operations, packing materials, containers, etc.)
- Q6 Unusable parts (e.g. reject batteries, exhausted catalysts, etc.)
- Q7 Substances which no longer perform satisfactorily (e.g. contaminated acids, contaminated solvents, exhausted tempering salts, etc.)
- Q8 Residues of industrial processes (e.g. slags, still bottoms, etc.)
- Q9 Residues from pollution abatement processes (e.g. scrubber sludges, baghouse dusts, spent filters, etc.)
- Q10 Machining/finishing residues (e.g. lathe turnings, mill scales, etc.)
- Q11 Residues from raw materials extraction and processing (e.g. mining residues, oil field slops, etc.)
- Q12 Adulterated materials (e.g. oils contaminated with PCBs, etc.)
- Q13 Any materials, substances or products the use of which has been banned by law
- Q14 Products for which the holder has no further use (e.g. agricultural, household, office, commercial and shop, discards, etc.)
- Q15 Contaminated materials, substances or products resulting from remedial action with respect to land
- Q16 Any materials, substances or products which are not contained in the above mentioned categories.

“*Controlled waste*” - clinical, household, industrial and commercial wastes.

“*Commercial wastes*” - waste from premises used for trade or business

“*Clinical waste*” - waste from human tissue, blood, excretion, body fluids, pharmaceutical products, swabs, dressings, syringes, needles, sharps, or any other waste that may cause the infections of persons coming into contact with it.

“*Hazardous waste*” - The regulatory requirements for transporting hazardous wastes from a producing site are outlined in the Hazardous Waste Regulations. Regulatory guidance on the Interpretation of the definition and classification of hazardous waste can be obtained from the Group Environmental Department.

“*Animal By Products*” - ABPs are animal carcasses, parts of animals, or other materials which come from animals but are not meant for humans to eat. They can either be destroyed or can be used to make compost, biogas or other products. The requirements for the storage, transportation and disposal of animal by products are covered in the Animal By Products (England) and (Wales) Regulations.

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Hazardous wastes produced by Noble Foods may include but are not limited to:

- asbestos
- clinical wastes (e.g. sanitary wastes, used plasters etc.)
- waste chemicals
- batteries (e.g. lead acid batteries, or significant volumes of batteries containing mercury or cadmium)
- lamps, fluorescent tubes containing mercury (in significant quantities)
- refrigerants (such as CFCs, HCFCs)
- Oil Wastes

2. Responsibilities

The Chief Financial Officer is ultimately responsible for ensuring that waste is managed in accordance with legislative requirements. Site, Departmental and Line Managers or nominated representatives, are responsible for compliance with this procedure.

The Group Health, Safety and Environmental (HS&E) department is responsible for managing and maintaining the Group waste contract for general and recyclable waste. They are also responsible for providing advice and guidance where necessary on waste minimisation, resource efficiency and waste disposal practices.

The Site Manager or nominated person is responsible for arranging the disposal of redundant equipment and managing waste operations in accordance with the provisions of this procedure.

It is the responsibility of Site Managers or a nominated deputy to keep detailed waste records on site and available for inspection. [See section 4 for more details.](#)

Contractors have a responsibility to ensure that all waste they produce during their activities on Noble Foods sites is managed safely and in accordance with legislative requirements.

It is the responsibility of all employees to segregate and store waste in the appropriate containers provided on site, and in accordance with site specific instructions.

It is the responsibility of employees when planning to undertake activities likely to generate an additional waste burden to pre-notify the Site Manager, in order for appropriate handling and disposal methods are implemented.

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3. Detailed Procedures

3.1 Waste Production

Waste produced by routine office activities shall be minimised through re-use and recycling wherever practicable.

Waste produced from plant and equipment shall be minimised through its efficient operation and maintenance in accordance with manufacturers' instructions.

Waste from refurbishment and other construction activities will be minimised by appropriate design specifications.

The volume of waste produced on sites shall be monitored through visual inspection of the content of waste containers and the recording of waste quantity produced by type of waste.

Activities likely to produce additional or non-routine waste will be pre-notified to the Site Manager, giving as much notice as possible.

3.2 Waste Handling and Storage

As far as is reasonably practicable, waste management and waste minimisation will be practiced through the following waste hierarchy approach:

- Avoidance and minimisation
- Reuse
- Recycling
- Recovery
- Disposal

Items classified as waste will be handled and stored in line with duty of care requirements.

Waste produced through the routine management of outside areas shall be minimised through the prevention of litter accumulation.

Wherever practicable, waste should be compacted before placing in a storage container for off-site disposal/recycling.

All waste will be stored in a safe and secure manner pending collection by third party contractors for recovery, recycling or disposal.

All waste will be stored in a manner that prevents its escape. All waste containers shall be clearly labelled to identify the contents of the waste container.

Wherever possible, access to waste containers will be restricted to Noble Foods designated employees, contractors and contracted waste collection contractors.

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Liquid wastes shall be stored in containers appropriate for the properties of the waste. Such containers will be stored in a suitably bunded area.

Waste produced by contractors will be stored in designated areas and in dedicated sealed containers as provided by the contractor, unless otherwise agreed by the Site Manager / Project Manager / Waste Manager. It is the responsibility of all contractors to remove waste they generate from Noble Foods sites unless otherwise agreed by a Site Manager / Project Manager / Waste Manager.

Redundant IT equipment shall be appropriately labelled and stored securely pending disposal and arrangements for its collection must be directed towards the IT Department.

At locations where provision is made for the segregation of waste for recycling the containers will be clearly and appropriately labelled, with guidance provided to all employees on how to manage waste on site.

3.3 *Transportation, Disposal and Collection*

Waste produced on site by Noble Foods, will only be transported off site by a registered waste carrier. A copy of the waste carrier's valid registration certificate must be obtained. Historical records of waste transfer should be retained for three years.

All branded waste packaging generated from all Noble Foods sites is subject to secure disposal, therefore all packaging must be shredded either onsite or at the destination of disposal prior to any recycling of the material. **A destruction note is required for all branded packaging.**

Copies of valid waste management licenses for the final destination of all wastes shall be maintained on site and records retained for three years.

Waste will be segregated at source, where practical, into wastes requiring disposal and those for which recycling has been arranged. Data on the amount of waste being produced on site will be maintained by the site manager or nominated person. This information will be used to track progress against company waste targets.

Containers will be inspected for waste streams that are not disposed of correctly within at least 24 hours before collection, where possible and practical. These waste streams will only be removed where it has been identified that it is safe to do so.

All waste transferred off-site will be accompanied by a waste transfer note, completed and containing information in accordance with the relevant regulatory requirements and codes of practice. For regular collections from the same source and the same waste type, a 'season ticket' may be used to cover all such transfers during a period not exceeding 12 months. Copies of waste transfer notes will be available at all times and retained for three years.

All wastes must be collected and transported by an approved waste carrier and in accordance with the following regulations:

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- The Environmental Protection Act section 34
- Waste (England & Wales) Regulations 2011
- The Waste (Scotland) Regulations 2012
- The Environmental Protection (Duty of Care) (Scotland) Regulations 2014
- Animal By Product (Enforcement) (England, Wales & Scotland) Regulations 2011
- Waste Electrical & Electronic Equipment Regulations 2013
- Control of Asbestos Regulations 2012
- The Hazardous Waste (England & Wales) Amendment Regulations 2009
- The Special Waste (Scotland) Regulations 2004

3.4 *Animal By Products*

Animal By products (ABP's) are separated into 3 categories which are based on risk. See below for the description of the categories of ABP's.

Category 1 ABPs

Category 1 ABPs are classed as high risk.

They include:

- carcasses and all body parts of animals suspected of being infected with TSE (transmissible spongiform encephalopathy)
- carcasses of wild animals suspected of being infected with a disease that humans or animals could contract
- carcasses of animals used in experiments
- parts of animals that are contaminated due to illegal treatments
- [international catering waste](#)
- carcasses and body parts from zoo and circus animals or pets
- specified risk material (body parts that pose a particular disease risk, e.g. cows' spinal cords)

Category 2 ABPs

Category 2 ABPs are classed as high risk.

They include:

- animals rejected from abattoirs due to having infectious diseases
- carcasses containing residues from authorised treatments
- unhatched poultry that has died in its shell
- carcasses of animals killed for disease control purposes
- carcasses of dead livestock
- manure

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- digestive tract content

Category 3 ABPs

Category 3 ABPs are classed as low risk.

They include:

- carcasses or body parts passed fit for humans to eat, at a slaughterhouse
- products or foods of animal origin originally meant for human consumption but withdrawn for commercial reasons, not because it's unfit to eat
- domestic catering waste
- shells from shellfish with soft tissue
- eggs, egg by-products, hatchery by-products and eggshells
- aquatic animals, aquatic and terrestrial invertebrates
- hides and skins from slaughterhouses
- animal hides, skins, hooves, feathers, wool, horns, and hair that had no signs of infectious disease at death
- processed animal proteins (PAP)

PAP are animal proteins processed from any category 3 ABP except:

- milk, colostrum or products derived from them
- eggs and egg products, including eggshells
- gelatine
- collagen
- hydrolysed proteins
- dicalcium phosphate and tricalcium phosphate of animal origin
- blood products (although any processed blood would still be subject to this guide)

3.4.1 Storage on Animal By Products

If you run a category 3 processing, handling or storage plant, you must do one of the following:

- keep any category 1 and category 2 materials in a separate building, that's both:
 - divided from the category 3 plant by floor-to-ceiling walls or partitions
 - accessed by a dedicated entrance and exit
- prove to AHPA inspectors that you're using an equally effective method to separate category 1 and 2 material from your category 3 plant

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3.4.2 Labelling

Vehicles, containers, or packaging must also have a label attached that says what category of ABP the contents are.

You must use these wordings:

- category 1 material - 'for disposal only'
- category 2 material - 'not for animal consumption'
- category 3 material - 'not for human consumption'

3.4.3 Disposing of ABPs

Category 1

You can only dispose of category 1 ABPs by:

- incineration or co-incineration at an approved plant
- [processing using processing methods 1-5](#) followed by permanent marking using GTH, then incineration or co-incineration
- pressure sterilisation (apart from possible TSE cases or animals killed under TSE eradication laws) followed by permanent marking, then landfill
- using them as fuel for combustion at an approved combustion plant
- sending them for burial at an authorised landfill, if they are [international catering waste](#)

Category 2

You can only dispose of category 2 ABPs by:

- incinerating or co-incinerating without processing or with prior processing, when resulting material has to be marked with glyceroltriheptanoate (GTH)
- sending them to authorised landfill after processing by pressure sterilisation and marking with GTH
- making them into organic fertilisers/ soil improvers, after processing and marking with GTH
- composting or anaerobic digestion after processing by pressure sterilisation and marking with GTH (milk, milk products, eggs, egg products, digestive tract content, manure do not need processing, providing no risk of spreading serious transmissible disease)
- applying them to land, in the case of manure, digestive tract content, milk, milk products and colostrum, this can be done without processing
- using them in composting or anaerobic digestion, if they are materials coming from aquatic animals ensiled

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- using them as fuel for combustion
- using them for manufacture of certain cosmetic products, medical devices and safe industrial or technical uses

Category 3

You can only dispose of category 3 ABPs by:

- [incineration or co-incineration](#)
- sending them to landfill after they've been processed
- processing them, if they're not decomposed or spoiled, and using them to [make feed for farm animals](#) (where allowed by the TSE/ABP regulations)
- processing them and using them to [make pet food](#)
- processing them and using them to [make organic fertilisers and soil improvers](#)
- using them in [composting or anaerobic digestion](#)
- ensiling (turning them into silage) if they come from aquatic animals
- applying them to land as a fertiliser, in some cases
- using them as fuel for combustion
- using them to make cosmetic products or medical devices

4. Records

4.1 Hazardous Waste Consignment Note and Controlled Waste Transfer Notes

The regulations require that all producers, transporters and receivers of waste must complete, sign and keep a consignment note or waste transfer note that contains an accurate description of the waste to enable the contractor to handle the waste correctly and lawfully. The regulations require a copy of the waste transfer note or consignment note to be kept.

Consignment notes used to record the transfer of Hazardous/ Special waste must be kept for **3 years** from the date of the transfer.

Waste Transfer notes used for record the movement of non hazardous or non special wastes must be kept for a period of **2 years** from the transfer date.

4.2 Waste Contractor Documentation

It is the responsibility of the Site Manager or nominated deputy to keep adequate records for the waste contractors that are used by the site in order to fulfil Duty of Care requirements.

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Each site will keep within their “Site Environmental Records Folder” the following records for each waste contractor they use

- A valid and up to date waste carriers licence
- Fully completed waste transfer notes / Hazardous Waste or Special Waste Consignment notes

All records must be fully available for inspection at any time.

4.3 Incineration records for ABP's

Where farms have their own incinerators and are subject to audit by AHVLA inspectors the site will be required to completed records in accordance with the approval certificate.

4.4 Audits

An Audit Trail of waste production, storage and disposal will be completed on a periodic basis during the internal audit programme to establish regulatory compliance in line with the Duty of Care requirements.

This will be further enhanced by Duty of Care audits conducted by the Central Environmental Advisor for the Noble Foods Group. Appendix 1 – [Waste Contractor Site Inspection Report](#) will be completed and Appendix 2 – [Waste Vehicle Tracking Report](#) will be used where appropriate to record the destination of wastes transported from Noble Foods sites.

4.5 Waste reports

Monthly and annual waste management reports should be obtained from the all waste contractors and used to track progress against Noble Foods waste targets and site specific reduction targets. Completed report with supporting information should be provided to the Group Health, Safety and Environmental Department annually. This should be submitted on the 1st January each year for the previous year.

Document Control

Date	Revision	Changed By	Record of Changes
			Previous versions link to old environmental manual – refer to environmental archive system.
1 st Nov 2014	2014 V1	Glenn Evans	New procedure issued
1 st Nov 2014	2014 V2	Glenn Evans	Addition of more information regarding animal by products
01.11.16	2016 V1	Glenn Evans	Review of procedure in line with the review date