Environmental Working Plan

(7th Revision December 2025)

TIER1 IT SERVICES LTD

1- 3 Baltic Wharf, Station Road, Maldon, CM9 4LQ, Essex.
Waste Management License: **EA WML/71465**

Table of Contents

1 Site details/infrastructure

1.1 Site details

Tier 1 Asset Management Limited has been operating an IT Asset Disposal operation at Unit 1-3 Baltic Wharf, Station Road, Maldon, Essex, CM9 4LQ under waste permit license No: EA WML/71465 since August 2004, previously under the name **EOL** IT Services Ltd. The site is currently licensed to take 4,999 tons per annum.

An identification board is visible on the side of the building and visible from the public road.

The site consists of three connected units and four main areas of work within, **Goods In**, **Goods Out**, **Engineering** and **Secure Storage**.

The main types of equipment (waste) received are as follows:

- Personal Computers (PC's), laptops & servers
- Computer Monitors (CRTs, LCDs)
- Mobile phones and tablet device
- Printers, fax machines & copiers
- Networking and miscellaneous

1.2 Operational hours

The site will be operational for the receipt of waste during the following hours:

- Monday to Friday **8.00 am** to **17.00 pm**
- Saturdays, Sundays and Bank Holidays Closed

This is in line with current planning permission of operations.

1.3 Operation framework

We will operate under:

Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities.

Also, our business requirements to are to maintain our BS8887 kitemark, ISO 14001, ISO 9001, ISO 45001, ISO 27001, CAS-S, PASF, Cyber essentials and Cyber essentials plus.

1.4 Staff/supervision (Environmental Team)

- The site is staffed by **52** full-time staff members. William Kasperaitis is the technically competent, WAMITAB qualified ***Waste Manager***.
- All staff attend an internal training course run by **TIER1 IT Services Ltd** that covers Health, Safety and Environmental Awareness as well as other key aspects of our business that relate to the operation of our ITAD business and WEEE treatment site. (Records of this are kept on the online Training Matrix.) Business Continuity training and testing is carried out periodically and includes likely environmental emergencies and consequences that could result.
- Holiday and illness cover for the ***Waste Manager*** is provided by Daniel Smith, the Compliance Manager.

1.5 Site storage and treatment limits

Treatment is limited to 50 tons a day with a 10 tons per day maximum for shredding

The permit limits our maximum storage limit to the details below at any given time: -

- 50 tons of hazardous material including waste electrical and electronic equipment
- 12 Tons of batteries
- 56 tons of Metal or non-hazardous material

However, to maintain other requirements for the waste site we must maintain hazardous under 50 tons total storage at any time.

The current exemptions may indicate higher amount, but the site is limited to the permitted maximum volume set by the site permit.

We are limited mainly to physical sorting and separation of waste only, however dismantling or

We are not allowed to treat batteries or fridges and cannot conduct other mechanical treatment processes

Below is a table outlining the overall storage and annual acceptance limits.

Row Labels	EWC Code	Storage limit at any given time overall	Annual Acceptance limit
Batteries	16 06 01*	12 Tons	4999 Tons
Batteries	16 06 02*		
Batteries	16 06 05		
Batteries	20 01 33*		
Batteries	20 01 34		
Metal	16 02 16	56 Tons	
Metal	16 02 14		
Metal	20 01 40		
WEEE	16 02 13*	56 Tons	
WEEE	16 02 15*		
WEEE	16 02 15* & 16		
WEEE	19 02 04*		
WEEE	16 02 11*		
WEEE	20 01 35*		
WEEE	20 01 35* & 36		

However, to remain a waste operation and not to become an installation the following limits apply

In summary all stored hazardous waste will not exceed 50 tons at any time.

Row Labels	Category group	EWC Code	EWC description (as per WM3)	Material limited to storage at one time	Overall material maximum limit onsite
Hazardous	Batteries	16 06 01*	Lead batteries	12 Tons	12 Tons
		16 06 02*	Ni-Cd batteries		
		20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries		
	WEEE	16 02 11*	WEEE containing chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs)	50 tons	50 tons including total of hazardous batteries being stored
		16 02 13*	Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12		
		16 02 15*	Hazardous components removed from discarded equipment		
		16 02 15* & 16	Hazardous components removed from discarded equipment		
		19 02 04*	premixed wastes composed of at least one hazardous waste		
		20 01 35*	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components		
		20 01 35* & 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components		
Non Hazardous	Batteries	16 06 05	other batteries and accumulators	12 Tons	12 tons
		20 01 34	batteries and accumulators other than those mentioned in 20 01 33		
	Metal / Non Hazardous WEEE	16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13	56 Tons	56 Tons including weight of hazardous WEEE material also in storage
		16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15		
		20 01 40	Metals		

1.6 Manual repair, refurbishment and waste EWC codes

Material that is known to be suitable for reuse with no need for, or with only minor repair will not be treated as waste. Such material will be subject to testing and recorded in accordance with company policies. All will be recorded within AMO.

Other material will either always be waste or brought in as waste to be assessed, tested and recorded. The table below details this information.

Waste material will be sorted and transferred to a downstream partner.

Manual repair, refurbishment or waste	EWC Code	Category Names
Waste	16 06 01*	Lead acid batteries, UPS - Batteries
Waste	16 06 02*	Nickel Cadmium Batteries
Waste	16 06 05	Laptop Batteries, Li-ion NiMH- (not including cadmium or Mercury)

Waste	20 01 33*	Unsorted hazardous batteries (Mercury, Cadmium)
Waste	20 01 34	Unsorted Non-Hazardous batteries (Alkaline, Zinc Chromium)
Waste or limited reuse resale upon suitability	16 02 16	Monitor Stand/Base (Under approx. 5% cable or plastic present)
Waste or limited reuse resale upon suitability	16 02 14	Network Cabinet Large >31U (Under approx. 5% cable or plastic present), Network Cabinet Small <30U (Under approx. 5% cable or plastic present)
Waste	20 01 40	Server rails
Waste or limited reuse resale upon suitability (Excluding CRTs)	16 02 13*	CRT Monitor, PC - All in one/Combo, Projector Screens, UPS
Some resale after successful testing otherwise will be waste. Such items will be recorded in AMO.	16 02 15*	Media-Hard Drive-Loose, PCB card
Waste with potential for for some reused or resale for toners or cables if suitable outlets are available	16 02 15* & 16	Cables, Monitor Stnd/Base (Over approx 5% cable or plastic present), Toner
Waste	19 02 04*	Shredded Hard Drive, Shredded Phones, Shredded Tape
Air conditioners for example will be waste LCD monitors will be tested for viability where permitted and on successful testing and grading. Such items will be recorded in AMO.	20 01 35*	Air Con Unit (Confirmed degassed), LCD Monitor
Many of the items will be considered waste if we are unable to test or data wipe. Items such like mobile devices, monitors or PC systems will be subject to testing and will only be repaired or refurbished where viable. Such items will be recorded in AMO.	20 01 35* & 36	Data Bearing appliance, Data Media (Media Tapes, CD/DVD/FDD), Dockstat/Portrep, Epos Equipment, Handheld Device, Interact Whitebrd, Laptop, Laptop Hybrid, Media-CD/DVD/FDD, Media-Memory Keys and Cards (Data Media), Media-Tapes, Mobile Phone, Network Cabinet Large >31U (Over approx. 5% cable or plastic present), Network Cabinet Small <30U (Over approx. 5% cable or plastic present), PC, Peripherals, Printer Desktop MFD, Printer Floor Standing, Projector, Scanner, Server, Server Blade, Server Blade Enclosure, Small Mixed WEEE, Switch/Hub/Router/APs, Tablets, Tape Library, Telephone Desk, Terminal
Waste	16 02 11*	Refrigeration (Pentane)

1.7 EWC codes and their reflections on AMO

Category Group	EWC Code	Category Names
Batteries	16 06 01*	Lead acid batteries, UPS - Batteries
Batteries	16 06 02*	Nickel Cadmium Batteries

Batteries	16 06 05	Laptop Batteries, Li-ion NiMH-(not including cadmium or Mercury)
Batteries	20 01 33*	Unsorted hazardous batteries (Mercury, Cadmium)
Batteries	20 01 34	Unsorted Non Hazardous batteries (Alkaline, Zinc Chromium)
Metal	16 02 16	Monitor Stand/Base (Under approx. 5% cable or plastic present)
Metal	16 02 14	Network Cabinet Large >31U (Under approx. 5% cable or plastic present), Network Cabinet Small <30U (Under approx. 5% cable or plastic present)
Metal	20 01 40	Server rails
Small mixed WEEE	16 02 13*	CRT Monitor, PC - All in one/Combo, Projector Screens, UPS
Small mixed WEEE	16 02 15*	Media-Hard Drive-Loose, PCB card
Small mixed WEEE	16 02 15* & 16	Cables, Monitor Stnd/Base (Over approx 5% cable or plastic present), Toner
Small mixed WEEE	19 02 04*	Shredded Hard Drive, Shredded Phones, Shredded Tape
Small mixed WEEE	20 01 35*	Air Con Unit (Confirmed degassed), LCD Monitor
Small mixed WEEE	20 01 35* & 36	Data Bearing appliance, Data Media (Media Tapes, CD/DVD/FDD), Dockstat/Portrep, Epos Equipment, Handheld Device, Interact Whiteboard, Laptop, Laptop Hybrid, Media-CD/DVD/FDD, Media-Memory Keys and Cards (Data Media), Media-Tapes, Mobile Phone, Network Cabinet Large >31U (Over approx. 5% cable or plastic present), Network Cabinet Small <30U (Over approx. 5% cable or plastic present), PC, Peripherals, Printer Desktop MFD, Printer Floor Standing, Projector, Scanner, Server, Server Blade, Server Blade Enclosure, Small Mixed WEEE, Switch/Hub/Router/APs, Tablets, Tape Library, Telephone Desk, Terminal
Small mixed WEEE	16 02 11*	Refrigeration (Pentane)

1.8 Specified waste management operations

(*See **General Warehouse and Facilities manual** for further details of how we handle waste materials, **G02-20**).*

No waste management operations shall be authorised by this license unless:

- specified in and undertaken in accordance with the limitations in section 1.1 of the working plan and in the following table; or
- otherwise required by the conditions of this license as being an integral part of those operations:

Table 2.4 - Specified Waste Management Operations

Specified Waste Management Operation	Permitted Waste Types which may be subject to the Specified Operation	Limits on Specified Waste Management Operations
R13: Storage of waste consisting of materials intended for submission, on this site to any of the category 'R' operations authorised under this column, or elsewhere than on this site, to any of the operations listed in Part IV of Schedule 4 of	All	*Maximum storage capacity:* • *Waste electrical and electronic equipment 56 tons* • *Waste batteries 12 tons*

the 1994 Regulations, (excluding temporary storage, pending collection, on the site where it is produced).		
R3: Recycling or reclamation of metals and metal compounds.	*All*	*Treatment consisting only of physical sorting or separation of waste into different components for recycling or reclamation.*
R4: Recycling or reclamation of other inorganic materials.	*All*	*Treatment operations detailed in section 1.1.7, 1.1.8, 1.1.9, 1.1.10 and 1.1.11 of the working plan.*

Permitted categories and types of wastes

- No wastes other than those which are categorized below in Table **2.4** shall be accepted at the site.

Permitted quantities of wastes

- The quantities of wastes accepted shall not exceed those listed in Table **2.4**. Whilst complying with the maximum quantities specified for each type of waste, the total quantity of waste accepted at the site per year shall not exceed **4,999 tons.**

Table 2.4a – Permitted quantities of waste

Permitted Waste Categories	European Waste Catalogue Chapter	Maximum Permitted Quantities for each waste category (subject to maximum permitted total quantity in condition 1.2.2) (tons/year)
Electrical and electronic equipment	***1602 wastes from electrical and electronic equipment*** *16 02 13* discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12*	*4,999 tons/year (subject to maximum storage capacities detailed in Table 1.1)*
Batteries	***1606 batteries and accumulators*** *16 06 01* lead batteries* *16 06 02* Ni-Cd batteries* *16 06 05 other batteries and Accumulators* *20 01 33* batteries and accumulators included in16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries*	*4,999 tons/year (subject to maximum storage capacities detailed in Table 1.1)*
Other wastes *Electrical and electronic equipment*	***20 01 separately collected fractions (except 15 01)*** *20 01 35* discarded electrical and electronic equipment other than those mentioned on 20 01 21 and 20 01 23 containing hazardous components*	*4,999 tons/year (subject to maximum storage capacities detailed in Table 1.1)*

	20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21,20 01 23 and 20 01 35	

Exclusion of wastes with other specified characteristics

- Notwithstanding the specification of permitted waste types under conditions 1.2.1 and 1.2.2 in our Waste Permit, wastes shall not be accepted at the site which have any of the following characteristics:

Table 2.4b - Excluded wastes of specified form and type	
Waste Characteristic	**Type**
Form and Type:	*Consisting solely or mainly of dusts, powders, liquids, sludges or loose fibres;*

T11 Exemption for treatment of waste

TIER1 currently have in place a **T11** exemption to allow treatment of WEEE waste, this is being replaced in consultation with the EA.

T11 exemption conditions currently in place

Types of activity we can carry out under a T11 include:

- a business collecting waste computers from householders and businesses that no longer want them
- a reclamation group receiving waste electrical goods collected by the local authority from businesses and households

Both sort out the waste equipment into those that can be repaired and those that cannot. Once sorted they repair some items and dismantle the rest to be reused as parts

Types of activity we <u>cannot</u> carry out under a T11

- de-gas ozone depleting substances
- treat WEEE to be disposed of to landfill or incinerated
- mix hazardous waste with other hazardous or non-hazardous waste
- accept or treat fluorescent light bulbs or tubes

Amount of waste we can treat under a T11

- You can store or treat up to **1,000** tons over any **12-month period**.

Table 2.4c – T11 – Type of waste we can treat	
Waste code	**Permitted Waste Types which may be subject to the Specified Operation**
160211*	WEEE containing chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs)
160213*	WEEE containing hazardous substances or components other than polychlorinated biphenyls, CFC, HCFC or HFC, or free asbestos. For example, a TV monitor containing a cathode ray tube
160214	WEEE not containing hazardous substances or components
160216	Non-hazardous components removed from discarded equipment

200123*	WEEE containing CFCs
200135*	WEEE containing hazardous components other than fluorescent tubes and other mercury containing waste or CFCs
200136	WEEE not containing hazardous substances or components

Key conditions of a T11 exemption

The key conditions are:

- we must use the **best available treatment, recovery and recycling** techniques (BATRRT) when treating the waste – see BATRRT guidance for more information
- the place where WEEE is stored or treated should have an impermeable surface with facilities for collecting spillages and, where appropriate, decanters and cleanser-degreasers
- the area where WEEE is stored should have a weatherproof covering – a covered container or roofed building
- whole and dismantled WEEE components should be stored appropriately to prevent damage which could stop them being reused or pose a risk to the environment
- hazardous waste, such as batteries, should be stored in suitable containers
- the purpose must be to ensure that the WEEE is put back to use as whole equipment if possible. If not possible, equipment can be taken apart so that the components can be used again. If that is not possible, equipment can be taken apart so the materials can be recycled

S02 exemption for storage of waste

TIER1 has in place an **S02** exemption for the storage of certain waste types, this must be renewed **every three years**.

Weight limits are given against each set of codes below:

Table 2.4d – S02 – Type of waste we can treat

Waste code	Types of waste	Storage limit (at any one time)	Period (Months)
160601 *, 160602 *, 160603 *, 160604, 160605, 200133 *, 200134	Batteries	10 tons	6
150104, 200140	cans and foil only	500 tons	12
140601 *	CFCs, HCFCs and HFCs	18 tons	6
070213, 150101, 150102, 150105, 200139	Food and drink cartons	500 tons	12
101112, 150107, 160120, 170202, 191205, 200102	Glass	5000 tons	12
080111 *, 080112, 200127 *, 200128	Paints (excluding specialist and industrial paints, wood preservatives, aerosol and spray paints, inks, adhesives and resins) pending reuse as paints only	10000 litres	5
030307, 030308, 150101, 191201, 200101	paper and cardboard (excluding food and drink cartons) only	15000 tons	12
090107, 090108	Photographic films and papers	50 tons	12
070213, 120105, 150102, 160119, 191204, 200139	Plastic	500 tons	12
080318, 150102, 160216, 200139	Printer cartridge only	5000 units	6

020110, 160117, 160118, 170401, 170402, 170403, 170404, 170405, 170406, 170407, 170411, 191202, 191203	Scrap metal	15000 tons	6
160211 *, 160213 *, 160214, 160216, 200121 *, 200123 *, 200135 *, 200136	WEEE	400 cubic metres	6
10113 *, 120301 *, 160708 *	Waste cleaning solution containing 2% sodium metasilicate and 1 to 2% waste oil only	3 tons	3
Multiple other EWC codes	*See S02 website for all other applicable codes that **do not apply** to **TIER1** activities:* https://www.gov.uk/guidance/s2-waste-exemption-storing-waste-in-a-secure-place		

Specified Waste Management Operations and Exempt Waste Management Operations

- Where wastes are being brought onto the site for waste management operations which are exempt from licensing under the 1994 Regulations, then the wastes which are subject to the specified waste management operations shall be kept clearly segregated and identified from those wastes which are being kept on the site for the exempt waste management operations.

Operations Specifics and Individual Processing Methods

- All collection deliveries of IT equipment are received through **Goods-In** via road transportation. A load may contain a variety of computer equipment and WEEE. This is generally collected from a client using our own transportation facilities unless specified by the client otherwise. A **Client Information Form** is completed for the collection site (if new site or significant variation) to ensure that **TIER1** have all relevant contact, access and security information. Trained collection staff will handle and remove all equipment.
- On return to the site the equipment is booked in allocating each item with an individual bar code number and the collection with a parcel number. Barcoding each piece of hardware means that its status can be identified anywhere in the facility as well as a weight is assigned based on the product description. Multiple items of one waste type may be booked in in bulk and individually weighted, the weights entered onto our database.
- Within **2 working days** of the collection, **TIER1** electronically send a booking-in report to confirm the items collected. All working equipment enters our engineering and is tested thoroughly. Full details of the equipment, a condition grade and engineering notes are recorded. Within this process, all visible identification is removed too.
- Within **14 days** a hard copy of this report along with payment and an official purchase order is sent to the Client. A monthly statement is sent electronically to the Client to show the status of all parcels including the number of outstanding items and payments sent to date.
- Of the waste management operations carried out on site, no waste disposal operations ('**D**' classifications table **2.4**) apply to any of the current or future waste handled on site. Of the waste recovery operations detailed ('**R**' classifications table **2.4**), **R3** does apply for PC's when systems are broken down into component parts and the metal casing may disposed through one of our approved refiners. **R13** also applies, as all systems are temporarily stored in the facility at some point. Either prior to processing when received through **Goods-In** or after processing and parts are held in the **Goods-Out** area.

The individual processing methods through the facility are detailed in the following paragraphs.

POP (Persistent Organic Pollutant)

Persistent Organic Pollutants are poisonous chemical substances that have been used in past products such as pesticides and industrial chemicals. The manufacture, sale and use of products containing POPS is banned. Any **pre-2009 WEEE waste** is considered to contain POPS and we ensure that this waste is sent to an approved downstream supplier for treatment. Our downstream suppliers are audited via duty of care visits to ensure they have the means to treat POPs. **No** internal or external parts from these devices are reused. These are also disposed of in the same manner. Waste transfer notes used for WEEE waste account for POPs.

WEEE that is considered to be waste will be treated as having POPs as a precautionary measure. Lead acid batteries will be described as containing POPs unless the plastic is proven not to be ABS or alike.

Monitors & other screens (LCD)

These are tested to ensure they are functioning (power on).

- **Non-functional LCD screens** are a very small percentage of the business. These are placed on pallets and stored within the building until an approved refiner collects them.
- **Functional LCD screens** are processed by tested to ensure all functions are operational, cleaned and stored for sale. They may be purchased by other IT sales companies for resale or sold to companies or individuals directly for use.
- **Due to POP guidelines we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

Monitors & other screens (CRT)

We now receive very few CRT screens, but they must be handled carefully.

- **All CRT screens** are placed carefully on pallets and stored within the building until an approved refiner can collect them. We no longer attempt to sell CRT screens, all are considered waste.
- **Due to POP guidelines we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

PC's, laptops & servers

These are thoroughly tested for functionality and **TIER1** engineers will repair any non-functioning systems as best they can, using spare parts removed from other systems. All data-bearing media found during testing is erased or destroyed through degaussing or shredding (See Site Operations 2.2) using industry approved processes. This is part of the contract **TIER1** has with its clients.

- **Non-functioning systems that cannot be made functioning** are taken to the Refining area for stripping. Working components will be removed and sold on individually or in bulk for re-use or recycling. Non-working parts are packaged in bulk for collection at the rear of the building by the appropriately licensed downstream supplier (see **3.14 Downstream Suppliers).** Materials will be segregated into different skips depending on type.

- **Functioning systems, (after testing, repair and data-erasure/destruction),** are sent to the cleaning area to be preferred for sale as individual items or as a batch sale. All items remain individually labelled during the sales and **Goods-Out** process.
- **Due to POP guidelines we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

Mobile devices, phones and tablets

These are thoroughly tested for functionality and **TIER1** engineers will repair any non-functioning systems as best they can, using spare parts removed from other systems. All data-bearing media found during testing is erased or destroyed through degaussing or shredding (See **Site Operations 2.2**) using industry approved processes. All SIMs are removed and destroyed, SD media found will be erased if possible or destroyed otherwise. This is part of the contract **TIER1** has with its clients.

- **Non-functioning mobile devices that cannot be made functioning** are sent for refining. Working components will be removed and sold on individually or in bulk for re-use or recycling. Non-working parts are packaged in bulk for collection at the rear of the building by the appropriately licensed downstream supplier (see **3.14 Downstream Suppliers).** Materials will be segregated into different skips depending on type.
- Screens and batteries will be removed and the data bearing components will be shredded
- Shredding is limited to a combined total of 1000 tons for all material shredded per year.
- **Functioning systems, (after testing, repair and data-erasure/destruction),** are sent to the cleaning area to be preferred for sale as individual items or as a batch sale. All items remain individually labelled during the sales and **Goods-Out** process.
- **Due to POP guidelines, we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

Printers, fax machines & copiers

When a printer is collected from a client site, the toner cartridge, if found is retained in the printer. On receipt at **TIER1**, the toner is also retained within the printer. On the rare occasion the printer is non-functioning, the non-salvageable parts are placed within the refiners skip for collection at the rear of the building.

- **Functioning printers** are further tested to ensure all functions are operational. They are then sent to the cleaning area in preparation for placement into storage to be sold as individual items or as a batch sale. Miscellaneous items (e.g. palm pilots) follow this same process to see if they can be re-sold.
- Non-functioning printers are dismantled for parts. Working components will be removed and sold individually or in bulk for re-use or recycling. Non-working parts are packaged in bulk for collection at the rear of the building by the appropriately licensed downstream supplier (see **3.14 Downstream Suppliers).** Materials will be segregated into different skips depending on type.
- **Due to POP guidelines, we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

Networking and miscellaneous

Networking and miscellaneous items (CCTV devices, UPS devices, webcams, etc) follow this same process as PCs, laptops and printers to see if they can be reused or re-sold. Non-salvageable parts are placed within the correct skip for collection at the rear of the building.

- **Due to POP guidelines we must ensure that all pre-2009 WEEE waste is sent to an approved site for treatment.**

Batteries and Refrigeration Equipment

Such waste items are recorded on arrival, weighed and then prepared for disposal through a suitable downstream supplier.

- Batteries are separated into types such as Ni-Cd and Lithium and place into a lidded container per battery type. These containers are waterproof and kept in suitable safe locations.
- Lead acid batteries will be brought in under hazardous and POPs classification due to the potential of all non- Polypropylene (PP) plastic to contain POPs.
    - Many models of lead acid battery will not be clearly marked with the plastic type and therefore caution must be taken.
- When collected batteries have terminals taped or for Lithium-Ion batteries will be covered in vermiculite
- Damaged batteries must be handled with the appropriate PPE used, identified and kept separately.
- Refrigeration devices are cleaned out and kept at the rear of the premises.
- No treatment will take place, and a preference will be given not to collect these items.
- Airconditioning will be questioned and asked for evidence of them being degassed already then collected under 20 01 35* & 35 if proven.
- Any hazardous substances found during such process and that we are not licensed to handle will be set aside securely and the client informed to arrange for proper disposal.

Shredding of hard disk drives and mobile devices

- Hard drives will be shredded indoors and into either agri sacks or tote boxes directly and closed
- The upper lid will be closed both for safety and to prevent dusts escaping
- The floor surrounding the shredder will be swept daily and sweepings kept in the shredded material to be recycled with the main material.
- The shredder will be wiped down on no more than a quarterly basis to remove excess dust using cloth or tissues. These will be kept out of main wastes and sent to a suitable outlet for destruction.
- HDD shredding is limited to 1000 tons as a combined weight of all material carried out annually
- Monitoring will take place through downstream recording

Other items when waste.

All material mentioned below will be segregated into their downstream element and sent for recycling

Units containing refrigerants will have no treatment other than sorting

Laptop PSUs may have cables removed

Keyboards and mice will have the cables removed

Packaging

We can collect waste packaging under our current S2 exemption until 2027 for cardboard and plastic packaging. Each must be coded with their respective EWC codes.

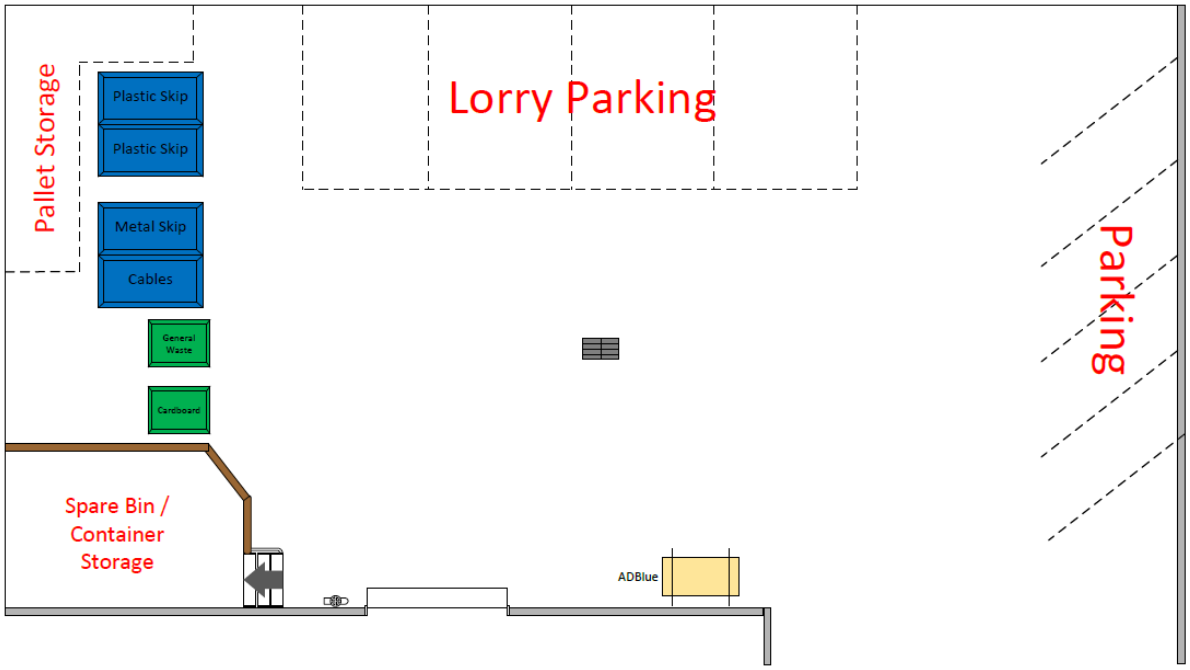
Packaging from refresh jobs can be accepted as non-waste in agreement with the waste permitting team under a non-waste framework directive (NWFD exemptions 2).
The only packaging we will accept will be part of any customer refresh or as storage of materials for transport.
We will bring it in and separate as part of our simpler recycling process and send all packaging to our respective recycling partner. No treatment apart from separation will take place

1.9 Site security & surroundings.

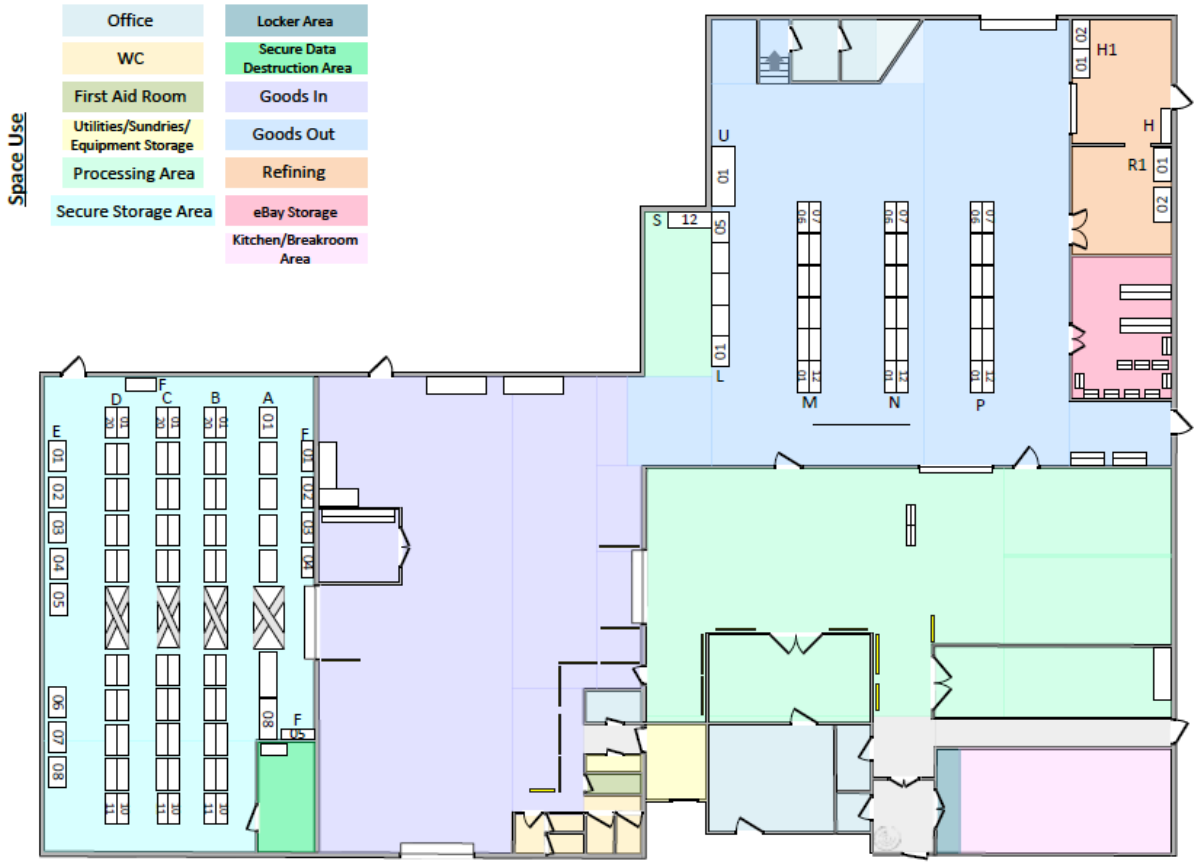
- The perimeter of the site to the west is protected by a **7'6''** steel fence until it joins a building structure in excess of **40ft** in height. The rear of the site (backing onto the river) is protected by a combined brick and chain link fence **15ft** high. The **Goods In** entrance at the front of the building is protected by a **7'** steel fence. The rest of the site is protected by the structure of the building itself.
- Access to the rear of our premises and waste storage skips is restricted by fences, gates, telescopic ram posts and barriers.
- The entire perimeter of our premises has CCTV coverage and electronic access control measures.
- Entrance to the rear of the building is via **7'** ft high access-controlled pedestrian door or vehicle gate.
- All collections would be arranged to allow **TIER1s** transport to return to base within the same day to ensure the security of equipment. The building itself is protected by a **24-hour** security system (Red Care) with key code entry and non-employees can only obtain access through reception. Vulnerable window access is protected via steel bars.

1.10 Site and waste storage plans

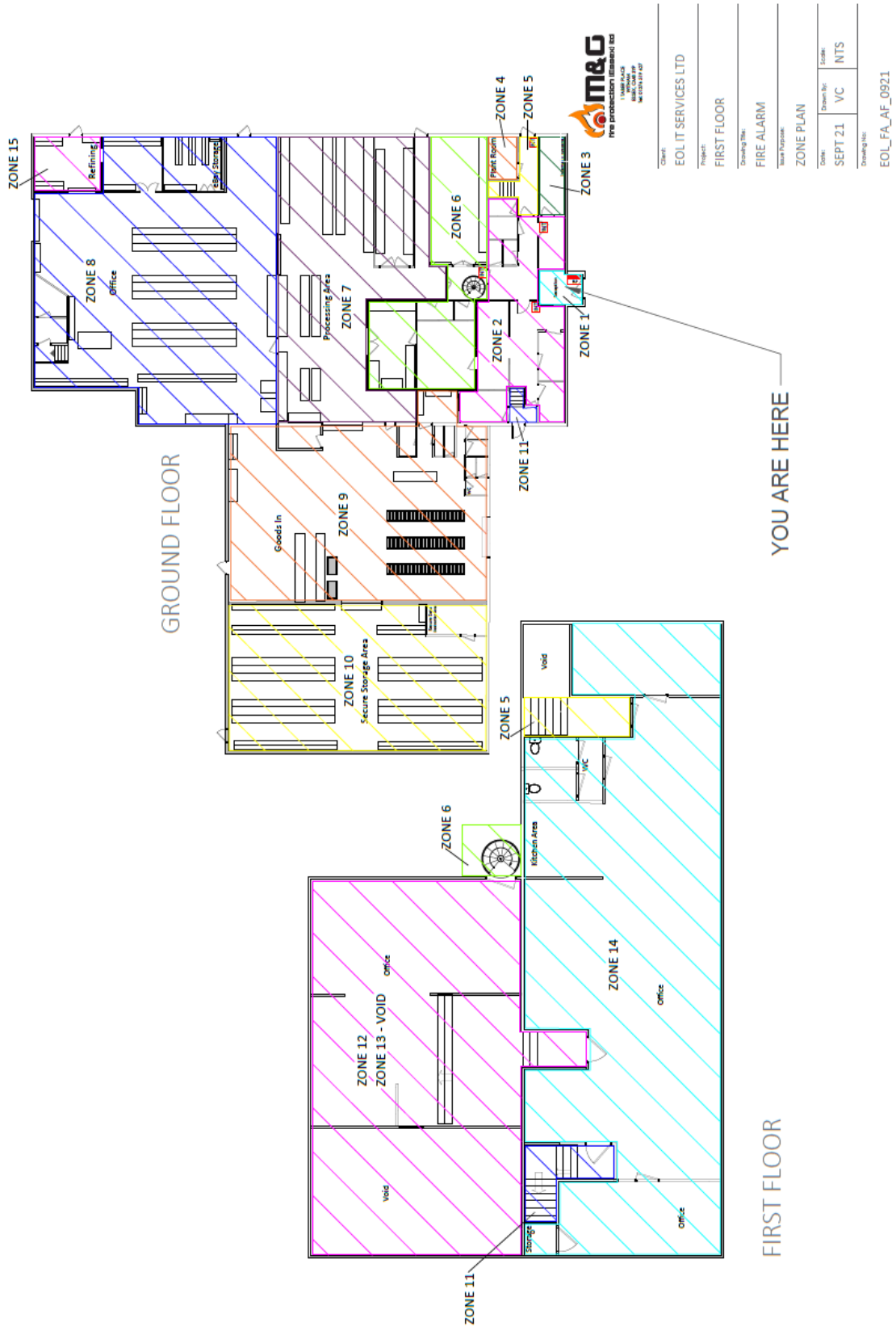
Outside rear yard



Pallet Racking and shelving plan



Premises Fire Alarm Zone Plan



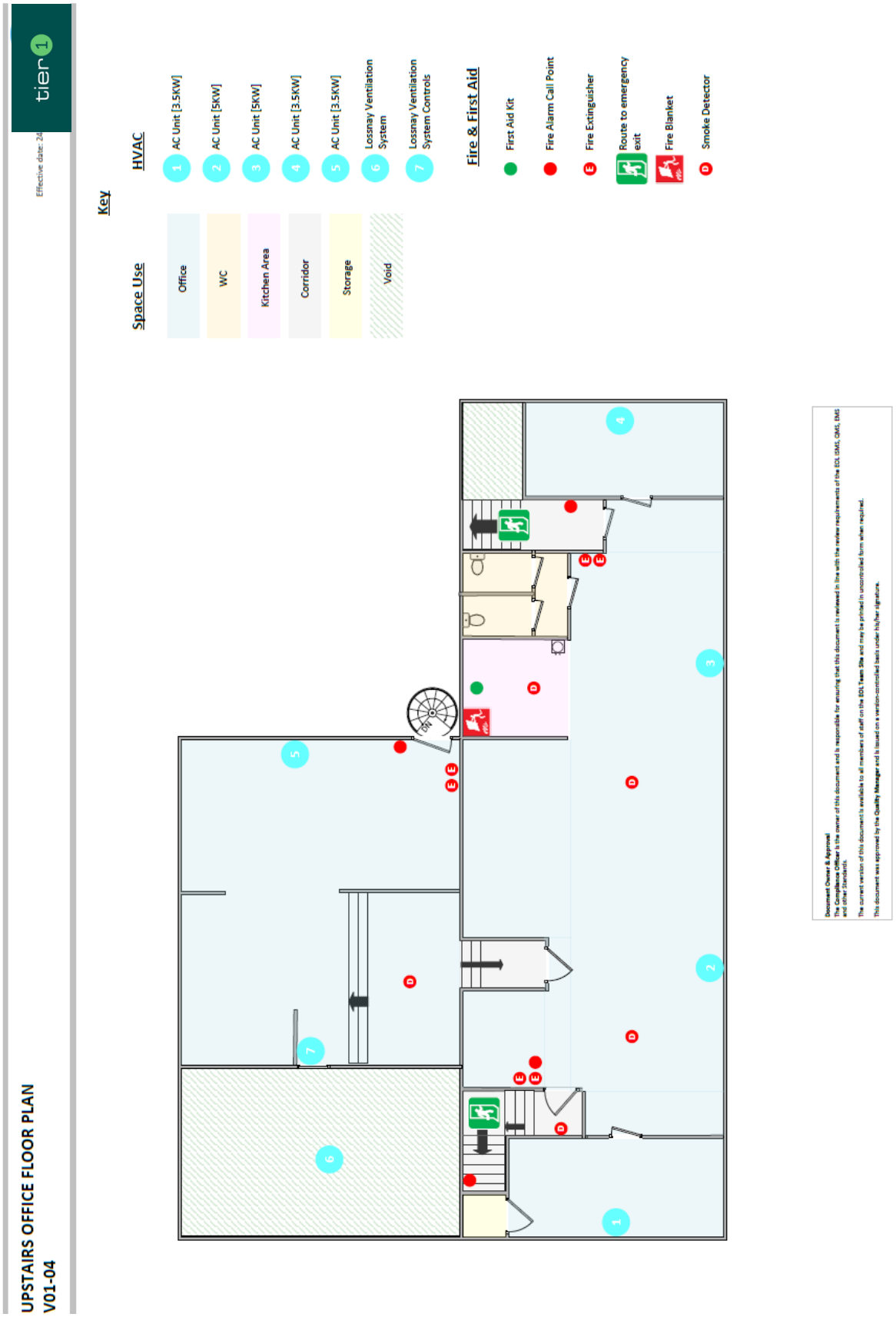

tier 1
Effective date: 24
Key
HVAC
1 AC Unit [3.5KW]
2 AC Unit [5KW]
3 AC Unit [5KW]
4 AC Unit [3.5KW]
5 AC Unit [3.5KW]
6 Lossnay Ventilation System
7 Lossnay Ventilation System Controls
Fire & First Aid
First Aid Kit
Fire Alarm Call Point
E Fire Extinguisher
Route to emergency exit
Fire Blanket
D Smoke Detector
Space Use
Office
WC
Kitchen Area
Corridor
Storage
Void
Document Owner & Approval
The Compliance Officer is the owner of this document and is responsible for ensuring that this document is reviewed in line with the review requirements of the EOL QMS, QMS, EMS and other Standards.
The current version of this document is available to all members of staff on the EOL Team Site and may be printed to uncontrolled form when required.
This document was approved by the Quality Manager and is issued on a version-controlled basis under his/her signature.
UPSTAIRS OFFICE FLOOR PLAN
V01-04

Table 2.6 – Waste storage locations			
Waste type	**EWC Code**	**Storage location within TIER1**	**Downstream supplier**
Metal (Light iron)	***20 01 40***	*40 yd skip – Back yard*	*Gibbs Recycling*
Cables	***17 04 11***	*40 yd skip – Back yard*	*Gibbs Recycling*
WEEE Plastic (Cat 3)	***20 01 35***	*40 yd skip – Back yard*	*SWEEEP Kuusakoski*
Lead acid batteries Li-Ion/Li-Polymer (Lithium)	***20 01 33***	*Battery stillage – Refining area*	*Ecosurety*
NiMH (Nickle-metal hydride) batteries	***20 01 34***	*Battery stillage – Refining area*	*Ecosurety*
NiCD (Nickle-cadmium) batteries	***20 01 33***	*Battery stillage – Refining area*	*Ecosurety*
Alkaline batteries	***20 01 34***	*Battery stillage – Refining area*	*Ecosurety*
Lithium batteries	***20 01 34***	*Battery stillage – Refining area*	*Ecosurety*
General waste	***20 03 01***	*12 yd skip – Back yard*	*Greens Recycling*
Polystyrene	***20 01 39***	*12 yd skip – Back yard*	*Greens Recycling*
Cardboard	***20 01 01***	*12 yd skip – Back yard*	*Greens Recycling*
CPUs (Plastic)	***16 02 15***	*Tea crate – Refining area*	*AWA Refining*
CPUs (Ceramic)	***16 02 16***	*Tea crate – Refining area*	*AWA Refining*
Memory sticks (RAM)	***16 02 15***	*Tea crate – Secure Unit 1*	*AWA Refining*
Mobile phones for witnessed shredding	***20 01 35***	*Tea crate – Secure Unit 1*	*AWA Refining*
Graphics cards	***16 02 15***	*Metal stillage – Refining Area*	*AWA Refining*
Printed circuit boards	***16 02 15***	*Metal stillage – Refining Area*	*AWA Refining*
Motherboards	***16 02 15***	*Metal stillage – Refining Area*	*AWA Refining*
CRT & LCD monitors	***20 01 35***	*Pallet box – Goods Out*	*SWEEEP Kuusakoski*
Used ink & toner cartridges	***20 01 36***	*Pallet box – Goods In*	*SWEEEP Kuusakoski*
Shredded tapes	***20 01 39***	*Pallet box – Secure Unit 1*	*Veolia*
Shredded paper	***20 01 01***	*Pallet box – Secure Unit 1*	*VTier1iaVeolia*
Aluminium	***10 04 02***	*Plastic stillage – Refining area*	*Gibbs Recycling*
Power supply units	***20 13 35***	*Plastic stillage – Refining area*	*Gibbs Recycling*
Copper/Aluminium	***20 01 40***	*Plastic stillage – Refining area*	*Gibbs Recycling*
Copper	***17 04 01***	*Plastic stillage – Refining area*	*Gibbs Recycling*

- Each waste type **must** be segregated into a separate container in the appropriate storage area.
- Waste **must** be stored in the appropriate conditions (indoors/outdoors, suitable temperature, away from damp, etc)
- All waste storage and movement of waste is controlled and authorised by the **TIER1 *Environment team.***
- TIER1 will periodically review their downstream suppliers to ensure compliance with our requirements and best practice (**SUSTAINABLE PROCUREMENT & SUPPLIER DIVERSITY POLICY PL14-03** & **WORK INSTRUCTION - SUPPLIER SELECTION AND ADMINISTRATION WI01-15**).

1.11 Environmental impacts & aspects matrix

Risk are judged on severity and frequency. We review these at least bi-annually or sooner depending on events and issues. Individual risk assessments will be carried out when felt appropriate on particular aspects. This may result from management review, auditing, change requests, staff suggestion, industry recommendations or other risk assessment activity.

2 Site operations

2.1 Site Access, Access Routes and Traffic Flow

All traffic entering and leaving the **TIER1** site is closely controlled. Vehicles making deliveries or collections are not allowed access to the rear of our site unless authorised by the Facilities Security Officer (FSO) or his designated deputy.

All such traffic can only collect from the rear of our premises using our concrete side road which is gate and barrier controlled.

Our vehicles are stored at the rear of our premises when not in use and loaded there before making collections.

2.2 Logistics/Movement of vehicles

We have a fleet of **3** lorries and **1** van with which we make collections from our client's sites. These are listed below.

Table 3.2 - Vehicle registration details		
Registration	**Make & model**	**Max weight**
RK72 GWO	DAF CF260	18000KG
PN71 GOC	DAF LF180	12000KG
RK72 GRX	DAF LF180	7500KG
GJ70 XBK	VW CRAFTER	3500KG

2.3 Management of waste/WEEE – weighing & recording on database

All WEEE waste and working equipment that we receive from our clients is recorded on our SQL database on arrival at our premises.

On initial entry to the system we record basic details, stock type, asset and serial number before segregating the item by 'parcel' (a single collection from one client) and place the equipment on one of more pallets or shelves for smaller items.

Any unusual or unique items of equipment or waste would be individually weighed.

Each time is given a unique barcode number which identifies it on our database system.

- **Goods-In Procedure - P02-02**
- **Processing Procedure - P02-03**

2.4 Waste Storage

Within the current method of operation, no harmful waste is processed which could find a pathway externally to the site. The potential sources of hazardous wastes considered currently are:

- **Monitors/Screens (CRT/LCD/Plasma)**
- **Uninterrupted Power Supply batteries (UPS)**
- **Batteries (Lead, Lithium)**
- **Refrigeration Equipment (Fridges/Freezers/Medical equipment)**

These are all stored within the confines of the building (refer to **2.7 Site and Waste Storage Plan)** which shows the identified storage areas).

- Monitors are placed in pallet boxes and kept indoors in our Goods-out area until collection.

- Batteries of differing types are stored separately in special lidded containers.
- Waste UPS batteries are stored within waterproof battery boxes ready for collection by the approved refiner.
- Refrigeration equipment is cleared out and stored at the rear of our premises awaiting collection.
- An approved refiner with the appropriate waste management license collects all non-salvageable products.
- A waste transfer note records all such disposals.

2.5 Control of shredded materials & the shredding process

- ***Work instruction - Incineration of Shredded Material - WI14-03***
- ***Work instruction - On-Site Shredding WI02-18***

2.6 Control of 'refined' materials

- ***Work Instruction - Refining - WI14-01***

2.7 Handling of hazardous waste.

- ***Work instruction - Control of Hazardous Waste WI14-02***
- ***Work instruction - Arranging Collection of Refining Material - WI14-05***

2.8 The storage of potentially harmful chemicals used by TIER1

- All chemicals used by **TIER1** for the processing of equipment are kept in a locked chemical room.
- Cleaning products used around the premises are kept in a locked room.
- Safety Data Sheets (SDS) are kept for all such products (See 5.5).

2.9 Vehicle maintenance.

Vehicles are maintained in line with manufacturer recommendations and serviced at approved servicing centres. Vehicle service books are kept up to date with the servicing carried out. HGV's are maintained under DVSA preventative maintenance inspection regulations every 12 weeks.

Vehicles are checked daily by Transport staff before use a phone app called 'SmartCheck':

https://smart-check.co.uk/

Any discovered issues are recorded and communicated to the ***Transport Manager*** for further investigation.

- **LOGISTICS POLICY PL11-01**
- **WORK INSTRUCTION - VEHICLE DEFECT MONITORING AND REPORTING - WI11-02**
- **TYRE MANAGEMENT POLICY - PL11-09**
- **FUEL, EMISSIONS & AIR QUALITY POLICY PL11-10**

2.10 Equipment maintenance

All equipment used by **TIER1** is maintained in line with manufacturer recommendations and any issues and planned maintenance is record on the company **Facilities Schedule (G01-15).**

- **EQUIPMENT CALIBRATION AND MAINTENANCE - P02-11**
- **IMS_DOC_9.1 - MONITORING, MEASUREMENT, ANALYSIS, EVALUATION PROCEDURE**

2.11 Plant and equipment to be used.

Various plant machinery will be used in the waste.

2.12 Manning levels, qualifications and experience of staff, and management systems.

Gods coming into **TIER1** are collected and unloaded by an experience team of drivers and warehousing staff.

2.13 Waste returns and acceptance

With the current process, **TIER1** personnel collect all deliveries and waste acceptance therefore occurs at the client's facility. The trained staff will only collect IT related products. Specific to printers, these will not be accepted from the client's site if the toner cartridge (or material) has contaminated the exterior of the printer. Any potentially hazardous Regarding CRT's, these are only collected as a complete assembly with the screens intact.

All of the above only presents a risk to the employees and is therefore covered by Health & Safety considerations. There is no risk to the general public.

2.14 Downstream suppliers

TIER1 work with several different downstream suppliers to remove waste from our site for disposal and recycling.

Full details of our current downstream suppliers can be found on the **DOWNSTREAM SUPPLIER PROCESS FLOW (PF14-02).**

Table 3.14 - Downstream Suppliers	
Downstream Supplier	**Waste Types Received**
SWEEEP Kuusakoski	WEEE Plastic, CRT & LCD screens, User ink and Toner cartridges, shredded HDDs
AWA Refiners	CPUs, ram sticks, mobile phones, various circuit boards and cards
Ecosurety	Lithium, NiCD, Alkaline, NiMH, Li-Ion, Li-Polymer batteries
Greens Recycling	General waste, polystyrene, cardboard
Veolia – Sheffield	Shredded tapes and paper
Robert Gibbs	Metal, cables, lead acid batteries, Copper, Aluminium, Power supply units

TIER1 regularly (at least every three years) carry out a **'Duty of Care' (DOC)** visit on all Downstream Supplier sites that **TIER1** work with.

- A **DOC Pre-audit Questionnaire F14-02** is sent to the site before our visit.

- A more detailed **DOC Audit Checklist F14-01** is completed by us with site staff during our visit.

3 Amenity Management & Monitoring

3.1 Pest infestations and control

- The containment of the food waste within our premises are kept to a minimum to minimise the risk. Bins are emptied several times a week and Operations staff must eat in the canteen area to avoid spillages.
- The site will be inspected regularly for evidence of pest infestations (e.g. rats, flies, ants, etc). Details will only be recorded when infestations are found. If necessary, a third-party will be engaged to deal with any infestation. A record of any treatment will be recorded in the **Site Diary.**

3.2 Noise & odour controls

- Due to the nature of our business noise and odour is not a major issue but we do have residential neighbours so must be mindful of their welfare.
- The nearest home is to the left of our yard which can be seen from their windows.
- If valid complaints are received about the noise generated by the operations, an independent noise consultant may be instructed to advise on appropriate mitigating measures.
- Current noise levels are minimal with the existing operations within the building.
- Noise level limits have already been considered within the existing planning permission.
- All operations are currently conducted within the building. Only the loading of vehicles and removal of waste skips at the rear of the building could result in noise disturbance to others but this is kept to a minimum and within the levels agreed in the planning permission levels.

3.3 Water & HVAC systems

TIER1 has air-conditioning systems in several places around the premises. These are serviced and maintained by a third-party company regularly.

3.4 Complaints and relationships

- If complaints are received, they will be logged in the site diary A complaint form is available as per appendix A and will be completed for each complaint. On receipt of any odour complaint a set precautionary measures will take place immediately.
  - Depacking and loading will be ceased
  - Doors will be kept closed. Deliveries will be minimized.
  - Any particularly odourous feedstock will be covered or removed from site.
  - Airtightness of pipe connections to the biofilter will checked and remedied if leaks found.
- The complaint form will be completed within 24 hours of receipt.
- A log of complaints will be kept and reviewed at weekly operations meetings with any actions recorded in minutes.

- The person complaining will be contacted and informed of any actions to be taken resulting from the complaint.
- Follow-up courtesy calls and additional monitoring will be put in place to ensure that odours at the receptor are no longer an issue.
- The district council will be informed of any complaints within the next working day

3.5 Control of debris, dust & litter

- All vehicles will enter the site via a solid concrete side access road.
- Visitors and staff will be required to wear appropriate PPE and abide by **TIER1** rules.
- A cleaner is employed on a part-time basis and cleans our premises a number of days each week. She also empties litter bins and cleans toilets.
- Any litter straying beyond the permit boundary will be picked up on sight. Staff are encouraged to keep our premises tidy inside and outside and to report any significant issues to their Line Manager. The focus, however, is on preventing litter from being produced in the first place.
- A covered skip will be used to collect general waste.
- As all operations (current & future) are carried out within the confines of the building (the **Goods-In** and out entrances allow vehicles to entirely enter within the cover of the building for loading and unloading) there is little opportunity for debris to be released from the building.
- The shutter door will remain closed during operations and especially on windy days

The shredder is kept away from and operated from the shutter area to minimise the risk of dusts escaping along with cleaning and sweeping

- Normal road dirt from Lorries entering and leaving the building is cleared using a broom and emptied into general waste skip.

Non-CRT related products would continue to be controlled in the current way and do not generate any form of airborne particle.

For current CRT processing, again products would continue to be controlled in the current way and do not generate any form of airborne particle.

A summary risk assessment has been made relative to these hazards and is shown in attachment I. These only relate to the storage of discarded product at the rear of the site. None of these are a direct waste received hazard.

An Asbestos report has been carried out on TIER1's premises and all areas of concern either treated, removed or marked. The report should be consulted whenever work is to be carried out that may affect areas of concern or any issues occur that may affect such areas.

3.6 Leaks and spillages/Spill controls

As all activities (current and future-planned) are conducted in a dry environment so no spillage or containment is possible. The building has a sealed impermeable floor and there is no drainage within the building.

As a result, no containment actions need to be considered

- The waste skip for rejected materials and general waste will always be kept covered. The skip will be removed by the provider and taken for treatment.
- Fuels are stored in bunded tanks.
- A spill kit is kept on site, containing portable sock bunds and oil absorbent mats. Staff will receive training on the use of the spill kit during their induction training, which also covers the safe re-fueling of plant and equipment to avoid drips and spillages.
- A regular machinery maintenance program is in place to minimise pollution problems caused from leaks and spillages.

3.7 Waste-water provision

The **TIER1** premises in on the main drains. One drain cover can be found at the front of the building by our Goods In entrance and one in our rear Goods Out yard. An open drain can be found inside the Goods In unit at the meeting of two sloping roofs. All of these are connected to the main drains.

- Drains are inspected regularly to prevent blockages.
- Staff are encouraged to report any issues with drains to their Line Manager.
- **TIER1** have vacuum water removal equipment on site to deal with any flooding emergencies

3.8 Weather and monitoring of meteorological conditions

Monitoring of weather at **TIER1** is generally a visual thing but we will monitor weather reports if severe weather expected.

- Surface water from the building roof is collected by guttering and connected to a sealed drain.
- Battery bins are used to collect various types of battery such as Lead Acid or Lithium. These are stored in segregated bins and the bins have heavy, waterproof covers.
- The **TIER1** Compliance Team receives alerts from the Environment Agency for any flooding alerts.
- During emergencies, a staff member has been appointed as 'Weather Monitor' for the duration.

3.9 Fire safety and precautions

- No open fires are allowed on site.
- Piles of dry materials such as cardboard will be stored in a manner to reduce the risk of fire and will be inspected regularly.
- Any fire will be treated as an emergency. In the event of a fire being discovered, the Emergency Services and the Environment Agency will be contacted. Staff will evacuate the working area and close the site. The site will remain closed until the fire is extinguished and will only be re-opened following approval from the Environment Agency.
- Any processing materials damaged by fire will be assessed by staff and categorised into materials as follows: a) those still able to be treated and b) materials that require disposal.

- Named and trained Fire Marshalls operate throughout our premises and are clearly identified in name and by photo on posters in key areas.
- There are 27 fire extinguishers located within the building. Their locations are shown on the site layout plans (section **2.7** – Site and waste storage plans) and are tested by a third-party regularly.
- A fire safety and evacuation process is in use, fire safety and evacuation posters are displayed in key areas indicating fire exits and extinguisher locations.
- Smoke and/or Heat detectors cover all areas of the premises where such factors are an issue and are tested by a third-party regularly.
- This is all communicated verbally during the initial induction of any new employee.

4 Site records & reporting

4.1 Security & availability of records

- Paperwork and information relating to the site will be kept securely in the **TIER1** Compliance or Finance office. **TIER1** operates a detailed filing system with all records kept in a safe, dry and secure environment. **TIER1's** filing systems are available for inspection by the Environment Agency by reasonable request.
- All records concerning transactions on site are kept by hard copy and/or electronically.
- Notices of waste collections by our waste refiners are arranged electronically or via audio and followed up with manual invoices after collection.
- All electronic documents on-site are backed up on- and off-site and restricted to authorised access only.
- Electronic documents are kept on the **TIER1** QEHSD online portal and restricted to authorised access only.
- The general **TIER1** Team Site online portal allows staff access to internal level documents appropriate for waste processes.
- All records of this kind are kept in line with our company retention requirements

4.2 Records of waste movements

- All incoming and outgoing waste will be recorded on waste transfer notes. Either a standard Waste Transfer note or Hazardous Consignment form will be used depending on waste type and EWC code. All such paperwork is stored with the **TIER1** ***Logistics Team*** and kept in line with our retention requirements.
- The skips (or bins) used to store waste before collection, are stored at the rear of the premises. Transfer notes are received for each waste collection by our downstream suppliers and stored as above.
- Occasionally, unusual waste will be received for which we do not have a license or exemption to store or treat. On such occasions this waste will be recorded, labelled, segregated from other waste and communicated with the sender of the waste. Arrangements will be made to return the waste to the sender or to dispose of it appropriately.

4.3 Refining tracker & periodic reporting of environmental performance

- Waste returns are performed every 3 months (Jan to Mar; Apr to Jun; etc.) and are emailed to the National Operator for Waste Returns or uploaded to the Operator returns portal, by a member of the ***Environment Team***.
- An ongoing recycling/reuse targets sheet is kept determining trends in waste volume and type and to monitor changes in business processes.
- See **Work instruction - Completing Hazardous Waste Returns Spreadsheet WI03-30**
- A '**Refining Tracker'** is used to compile figures showing our refining performance throughout the year and '**Refining Figures'** shows similar information in a more human-readable and presentable format.

4.4 Safety Data Sheets (SDS)

- Safety sheets are kept by the ***H&S Team*** for all chemical and hazardous product we use in the processing of received equipment.
- A copy of each sheet is also kept in the First Aid room.

4.5 Site diary & online Helpdesk

A '**Site Diary'** (in online calendar form) will be kept by **TIER1**, detailing all daily activities; weather information; any training that took place; any other incidents and to record any complaints or queries. The Site Diary is accessible and managed by the ***Environment Team*** and ***Facilities Security Officer.***

The Site Diary is used for any environmental issues and events but also for significant issues and events that occur during our work processes or occur nearby or that will have an effect on our premises or service provision such as:

- Vehicle servicing details
- Plant equipment servicing details
- Severe weather events or warnings
- Security events and issues
- Serious Health & Safety accidents and incidents affecting staff or vehicles
- Important EA communications, dates or visits
- Daily facility and security walk-round checks.

TIER1 makes available an **online Helpdesk** system for all staff. Any environmental, health & safety, information security and business continuity non-conformances, requests for change, incidents or potential incidents are recorded on the system and received by email by key staff members depending on area of issue.

4.6 Duty of Care forms and online survey

TIER1 regularly (at least every three years) carry out a 'Duty of Care' (DOC) visit on all Downstream Supplier sites that **TIER1** works with. We also carry out an annual online survey with our key suppliers

with more broad question covering a variety of important subjects such as information security, health & safety, data protection and staff welfare.

- A **DOC Pre-audit Questionnaire** is sent to the site before our visit. It contains questions about waste management but also information security, health & safety, data protection and staff welfare requirement when working with **TIER1.**
- A more detailed **DOC Audit Checklist** is completed by our representative onsite during our visit to the Downstream Supplier.
- Additional DOC visits may be conducted if arrangements or processes alter significantly.

4.7 Waste quantity measurement

Due to the nature of the products, no weighbridge system is proposed or currently used.

Products are received at **Goods-In** by **TIER1**-owned lorry from a client's premises. These products are then individually booked into the system, bar-coded and either placed on pallets or individually stored. As item received size and weight varies greatly, all items have an individual weight assigned to them based on their description. From this it is possible to quantify weights per collection, which can be tracked on a weekly or monthly basis.

- Items of more general waste will be segregated into material types, weighed and added to the database.
- For **Goods-Out**, deliveries could consist of a single item or parcel of many items. The larger loads would be palletized and rapped securely before dispatch.
- Occasionally a client may arrange its own courier to deliver items to us as required. All equipment received by such methods will be treated in the same way once received and entered on our database.
- See **Work instruction - Arranging Collection of Refining Material - WI14-05**

4.8 Facility, plant and vehicle maintenance records

- All records are kept centrally by the ***Compliance Officer (CO)*** in the Compliance Office. The ***Transport Manager*** and ***Logistics*** office also keep additional vehicle-related records.
- See **EQUIPMENT CALIBRATION AND MAINTENANCE**
- See **IMS_ MONITORING, MEASUREMENT, ANALYSIS, EVALUATION PROCEDURE**
- See **Work instruction - Vehicle Defect Monitoring and Reporting**
- A **Facilities Maintenance Schedule** tracks all servicing requirements and maintenance period and is also managed by the ***FM.***

5 Definitions and Terms

QEHSD – (Quality, Environmental, Health & Safety and Data)

- This is the name for **TIER1** Intranet system utilising Microsoft SharePoint. It controls the versions of our documents and access to them. The **QEHSD** section within it is restricted to members of the ***Quality Team*** and their delegates. The **TIER1** Team Site section is open to all staff as a general repository for suitable company-wide documents.

CISO – Chief Information Security Officer

- A senior member of management who is primarily responsible for information security at **TIER1**.

Management System Owner (MSO)

- An ***MSO*** is appointed for each ISO / BS standard we hold. This person is responsible for the daily running of their standard. They will normally be answerable to a senior member of staff and must seek approval for key documents affecting their standard from senior staff. They will create or coordinate the creation of and maintain all Policies, Procedures, Work Instructions, Risk Assessments, etc necessary to maintain their standard. They must also maintain the Skills Matrix, Roles/Job Descriptions and DRIM's for their standard. They will meet with external and internal auditors to review and assess their standards.

SDS – Safety Data Sheets

- SDS are key documents in the safe supply, handling and use of chemicals. They should help to ensure that those who use chemicals in the workplace do so safely without risk of harm to users or the environment.

DOC – Duty of Care

- Anyone who produces, imports, keeps, stores, transports, treats or disposes of waste must take all reasonable steps to ensure that waste is managed properly. This duty of care is imposed under section 34 of the Environmental Protection Act 1990. It also applies to anyone who acts as a broker and has control of waste.

WEEE – Waste Electrical and Electronic Equipment

- The WEEE Directive sets collection, recycling and recovery targets for all types of electrical goods, with a minimum rate of 4 kilograms per head of population per annum recovered for recycling by 2009. The RoHS (Restriction of Hazardous Substances) Directive set restrictions upon European manufacturers as to the material content of new electronic equipment placed on the market.

6 Responsibilities

6.1 Environment Manager

The ***Environment Manager (EM)*** is responsible for:

- Liaising with the Environmental Agency over environmental and waste matters
- Overseeing the environmental performance of our organisation.
- Developing, implementing and monitoring environmental strategies that promote sustainable development.
- Developing solutions for recycling, pollution reduction and pollution prevention to minimise our impact on the environment.
- Give advice and training to other **TIER1** staff on how to manage waste and minimise our environmental impact.
- Developing and monitoring the environmental goals and targets in **TIER1's** strategic plan.

- Keeping up to date with changes in environmental legislation and initiatives including EU directives.

6.2 Employees

All employees, contractors, elected members and agency staff are required to comply with the **Environmental Policy** and **Sustainable Procurement Policy**. All employees, elected members, contractors and agency staff have a responsibility to report any environmental incidents and breaches of this policy as quickly as possible in line with the Company's **Emergency Preparedness Plan.**

6.3 Management

Line Managers/Supervisors are responsible for monitoring and enforcing compliance and providing guidance to staff on the implementation of the document.

6.4 Document Owner

The owner of this document is responsible for ensuring that this document and all related documents are reviewed in line with the requirements in our standards and as part of our continual improvement process. It is the document owner's responsibility to ensure that any changes to this document are uploaded to the document system, and all relevant staff are notified of the changes immediately.

It is the document owner's responsibility to ensure that only the latest version of this document is available to staff and all retired versions of this document are removed from circulation and archived as appropriate.

Document Owner and Approval

Owner:	Signature	
	Name - Title	**W. Kasperaitis – Waste Manager**
Approved By:	Signature/s	
	Name - Title	**D Smith – Compliance Manager**
Approval Date:	**05/12/2025**	
Review Date:	**05/12/2026**	