WRM
wrm-ltd.co.uk
01943 468138

wrm
Sustainable Solutions, Assured

Pest Management Plan

v1.0

Environmental and sustainability solutions provided to

Waste Organics (Leeds) Limited

Document Title	Pest Management Plan
Client	Waste Organics (Leeds) Limited
Revision	v1.0
Date	27/02/2026
Document Reference	EPR-C07
Project Reference	1579/J05

Author: Bryanna Heaton	Reviewer: Martin Ropka
	

REVISION LOG

Revision	Details	Date
0.1	Initial draft	11/02/2026
0.2	Internal review	12/02/2026
0.3	Update following information return	24/02/2026
0.4	Internal review	24/02/2026
0.5	Client review	27/02/2026
1.0	First issue	27/02/2026

CONTENTS

1.0 INTRODUCTION

This Pest Management Plan (PMP) addresses the risk of attracting rats, flies and scavenging birds, hereafter known as pests in this report, and the control measures employed to mitigate the impact. These are supported through monitoring procedures to identify both elevated levels and review complaints should they arise. The complaints management procedure including the management responsibilities are also addressed.

1.1 Site Address

Waste Organics (Leeds) Limited
Waste Treatment Station
Knowsthorpe Road
Leeds
LS9 0NX

1.2 Operational Location

Grid Reference: Easting 433155, Northing 431765

1.3 Site Description

The site is situated on Knowsthorpe Road which is one of many roads present in the Crossgreen Industrial Estate. The industrial estate is located approximately 4km southeast of the centre of Leeds, near the Stourton and Knowsthorpe areas of the city. Knowsthorpe Road joins to Knowsthorpe Gate which itself is a main access road into the industrial estate from the A63 (Pontefract Lane) which is a main arterial road from the M1 motorway to the centre of Leeds. The site is surrounded by mixed-use industrial developments. Immediately north of the site is a vehicle bodycare workshop, adjacent to the east is Knostrop Sewage Treatment Works, to the south is a cement production facility and to the west is a chemical production facility. The River Aire is located approximately 600m south of the site and the nearest residential receptor is located approximately 1km north of the site. There are no sensitive ecological receptors within 750m of the site.

1.4 Site Operations

Whilst it is proposed to keep all of the above activities on the environmental permit for potential future operations, the application that this Pest Management Plan is part of relates only to the acceptance of new wastes to enable the treatment of biodegradable organic wastes to produce a “soup” of blended wastes suitable for feedstock to AD facilities. It is

anticipated that all “soup” leaving site shall be transferred to anaerobic digestion sites for further treatment.

1.5 Operational Hours

It is not proposed to amend the current operating hours which will remain as for the existing operations, namely 24 hours a day, 7 days a week.

2.0 MAINTENANCE AND TRAINING

2.1 Maintenance and Review of the PMP

The completed reports are distributed throughout the company for review at operational, management and health & safety meetings, as applicable.

Any required updates to site procedures or activities covered within this PMP will also require an immediate review and update to the PMP. In any circumstance, the PMP will always be reviewed annually from date of issue to ensure that controls described are current and sufficient. Reviews are recorded, and where amendments are required, the updated OMP is re-issued to site staff. This satisfies the biological waste treatment appropriate measure guidance (AM) Section 5.2 regarding periodic review and continuous improvement.

The PMP shall be stored in the site office with all company employees being made aware of this plan and shall be made accessible on request.

2.2 Responsibility for the PMP and Training

Overall responsibility for the preparation, implementation, and ongoing effectiveness of this PMP rests with the Site Manager.

The Site Manager is responsible for:

- Ensuring the PMP is implemented in full during site operations.
- Ensuring that all site personnel involved in waste reception, handling, storage, treatment and dispatch are trained and competent to undertake their duties and trained on the procedures outlined in this PMP.
- Reviewing operational performance and initiating updates to the PMP where required.

Day-to-day compliance with the PMP is supported by the Site Supervisor, who is responsible for supervising operational activities and verifying that procedures are followed on site. This

allocation of responsibility satisfies the intent of Appropriate Measures (AM) 5.1–5.3 regarding defined management roles and competence.

2.3 Training

All staff involved in site operations have received training appropriate to their role in order to implement the PMP, including:

- Waste acceptance and verification procedures for incoming material.
- Pest and contamination identification.
- Significance of pest prevention.
- Control, mitigation and monitoring techniques as stated in this PMP.
- Waste rejection procedures.

Training is delivered:

- As part of site induction for new staff.
- Through periodic refresher training, typically on an annual basis or more frequently where operational changes occur.
- Following any incident, non-conformance, or regulatory feedback where learning outcomes are identified.

Training is delivered by:

- The Site Manager or a suitably competent senior member of staff; and/or
- External training providers should specialist instruction be required (e.g. health and safety).

Training records are maintained and made available for inspection. This approach reflects the proportional, risk-based expectations of AM 5.4.

2.4 Relevant Sector Guidance

This Pests Management Plan has been developed in line with industry best practice including technical monitoring techniques and management processes from the following sources:

- Randall, C (1998) General Pest Management: A guide to commercial applicators.
- Environment Agency (2013) Fly management: how to comply with your environmental permit.
- NPMA (2016) Pest Management Standards for Food Plants.
- Biological waste treatment: appropriate measures for permitted facilities (November 2024).

3.0 RECEPTORS

Identification and assessment of sensitive receptors is a fundamental component of effective pests risk management and forms a key part of the Source–Pathway–Receptor (SPR) model applied within this PMP. The purpose of this section is to identify who may be affected by pests arising from the site, to understand the potential pathways by which pests could travel beyond the site boundary, and to inform the selection of appropriate measures to prevent or minimise the presence of pests.

Receptors are defined as people, property, or locations that may experience adverse effects as a result of pests. These may include residential properties, commercial premises, public buildings, outdoor recreational areas, workplaces, and other locations where people may reasonably be expected to be present for extended periods.
The identification of receptors has been undertaken with reference to:

- the nature of the activities carried out on site;
- the pests attraction potential of materials handled and processes operated;
- the extent to which pests favoured activities are contained or otherwise controlled;
- prevailing and seasonal meteorological conditions;
- topography and local land use;
- the frequency and duration of site operations.

The distance of receptors from the site boundary has been considered as an indicative screening factor only. Distance alone does not determine risk of pests; rather, risk is influenced by a combination of factors including:

- the effectiveness of pests prevention measures at source;
- whether activities are undertaken indoors or outdoors;
- the duration, timing, and intensity of pests attracting activities;

Although most adult flies stay close to their breeding sites (e.g., manure or putrescent waste), a proportion will disperse away and may cause problems at receptors. Houseflies are capable of dispersing over distances of several kilometres, although problems seldom occur at distances greater than 2-3 km from the source. Significant problems likely to cause unacceptable nuisance levels tend to occur within 500m of the source.

Details of identified receptors are provided in Table 1, including receptor type, approximate distance and direction from the site boundary, and a qualitative sensitivity assessment. This

information is supported by Figure 1, a scaled location plan showing the position of each receptor listed.

Table 1 - Sensitive Receptor List

Receptor Reference	Business Name / Receptor Description	Direction From Site (From true North)	Approximate Distance to Site Boundary (m)
HR 01	Vehicle Bodycare Centre / Industrial	North	23
HR 02	Sunbed Rentals / Industrial	North	98
HR 03	DHL Express / Industrial	North	298
HR 04	Richard Austin Alloys / Industrial	North	616
HR 05	Residential dwelling on Halton Moor Road	North	907
HR 06	OTL / Industrial	North-northeast	295
HR 07	Speedy Services / Industrial	North-northeast	444
HR 08	Mercado / BMK Flooring / Industrial	North-northeast	750
HR 09	Residential dwelling on Halton Moor Road	North-northeast	911
HR 10	AO / Industrial	Northeast	295
HR 11	ACS Stainless Steel Fixings / Industrial	Northeast	446
HR 12	Symington's Ltd / Industrial	North-northeast	554
HR 13	Residential dwelling on Halton Moor Road	North-northeast	943
HR 14	Residential dwelling on Halton Moor Avenue	North-northeast	964
HR 15	Floorstore Trade Counter / Industrial	Northeast	591

Receptor Reference	Business Name / Receptor Description	Direction From Site (From true North)	Approximate Distance to Site Boundary (m)
HR 16	Roberts Mart & Co / Industrial	Northeast	753
HR 17	McMullen JRL Facades Manufacturing / Industrial	Northeast	368
HR 18	Samuel Grant Packaging / Industrial	Northeast	615
HR 19	Perspex Distribution / Industrial	Northeast	818
HR 20	Vickers Oils / Industrial	East-northeast	345
HR 21	BCA Leeds / Industrial	East-northeast	584
HR 22	Farnell UK Distribution / Industrial	Northeast	942
HR 23	Curio Fulfilment / Industrial	East-northeast	837
HR 24	Workplace Amazon / Industrial	East-northeast	926
HR 25	Wastewater Treatment Works / Industrial	East	50
HR 26	Amazon DLS2 / Industrial	East	977
HR 27	Amazon LBA5 / Industrial	Southeast	803
HR 28	Skelton Grange EFW / Industrial	South-southeast	575
HR 29	Cement Manufacturer on Knowsthorpe Road / Industrial	South	32
HR 30	TCV Skelton Grange / Industrial	South	373
HR 31	Sigma Fixtures / Industrial	South	881
HR 32	Skelton Ltd / Industrial	Southwest	144

Receptor Reference	Business Name / Receptor Description	Direction From Site (From true North)	Approximate Distance to Site Boundary (m)
HR 33	Royal Mail Fleet Workshop / Industrial	South-southwest	801
HR 34	Everlast Scaffold / Industrial	South-southwest	650
HR 35	Froch Foods / Industrial	South-southwest	774
HR 36	Bestway Stourton / Industrial	Southwest	939
HR 37	Egger Timberpak / Industrial	West-southwest	412
HR 38	Srcl / Industrial	Southwest	660
HR 39	Sika Everbuild / Industrial	West	60
HR 40	CID Group / Industrial	West	292
HR 41	Tarmac / Industrial	West	824
HR 42	TRAD UK / Industrial	West-northwest	662
HR 43	Newross Impex / Industrial	West-northwest	951
HR 44	Sika Everbuild / Industrial	Northwest	97
HR 45	O.C.O Technology / Industrial	Northwest	280
HR 46	Global Material Sourcing / Industrial	West	357
HR 47	Lawcris Trade Counter / Industrial	Northwest	399
HR 48	Core Plant / Industrial	Northwest	820
HR 49	Thomas Armstrong (Concrete Blocks) Ltd / Industrial	North-northwest	192

Receptor Reference	Business Name / Receptor Description	Direction From Site (From true North)	Approximate Distance to Site Boundary (m)
HR 50	Shire Timber Group / Industrial	North-northwest	423
HR 51	Football World Leeds / Recreational	Northwest	641
HR 52	Private Rented Sector Housing Services / Industrial	North	371
HR 53	Recycling and Energy Recovery Facility / Industrial	North-northwest	689
HR 54	Compak Group / Industrial	North-northwest	475
HR 55	Euro Car Parts / Commercial	Northwest	832
HR 56	Fenton Packaging / Industrial	North-northwest	871
HR 57	Freshways Dairy / Industrial	North	557
HR 58	EHRLE UK Ltd / Industrial	North	870
HR 59	William Cook Rail / Industrial	Northwest	885

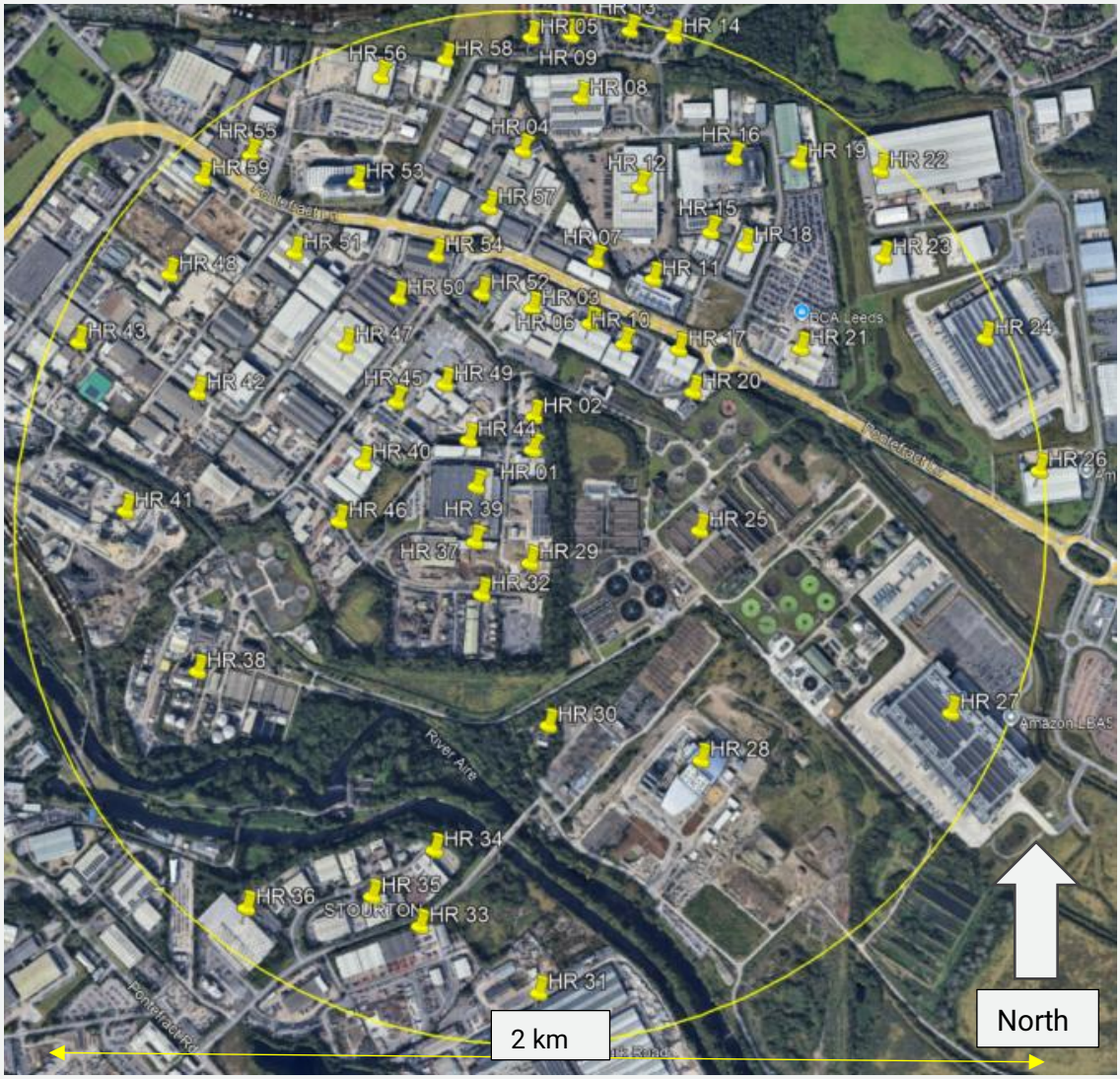


Figure 1 - Map of Sensitive Reception

4.0 PEST SOURCES, PATHWAYS, AND IMPACTS

4.1 Sources

Pests will be present when conditions on site are favourable for their existence. For example, in general, fly larvae occur in damp, decaying organic waste, however, each species will have a preferred niche in terms of the nature of the organic material, temperature and moisture levels.

The longer the period of time between waste generation and disposal, the higher the possibility that it may already be infested with flies on arrival.

4.2 Incoming Waste

Untreated biodegradable organic waste has a high risk of pest infestation due to biological activity, residual organic matter and microbial decomposition.

The following waste streams which are to be inputs into the 'soup' blending activity could generate pests activity:

Table 2 - Allowable Waste Codes for "Soup" Blending Activity

Waste Code	Waste Description
02 Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing	
02 01	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 01	Sludges from washing and cleaning – vegetables, fruit and other crops
02 01 02	Animal tissue waste
02 01 03	Plant-tissue waste
02 01 06	Animal faeces, urine and manure (including spoiled fully biodegradable animal bedding)
02 01 07	Wastes from forestry
02 01 99	Wastes not otherwise specified – spent mushroom compost from commercial mushroom growing only
02 02	Wastes from the preparation and processing of meat, fish and other foods of animal origin
02 02 01	Sludges from washing and cleaning, peeling, centrifuging and separation including wash waters and sludges from secondary food processing or the cook chill sector
02 02 02	Animal tissue waste
02 02 03	Materials unsuitable for consumption or processing including animal gut contents
02 02 04	Sludges from on-site effluent treatment including sludges from gelatine production

02 03	Wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 01	Sludges from washing, cleaning peeling, centrifuging and separation (including sludge from production of edible fats and oils, seasoning residues, molasses residues, residues from production of potato, corn or rice starch only)
02 03 04	Materials unsuitable for consumption or processing (including waste from production of edible fats and oils, seasoning residues, molasses residues, residues from production of potato, corn or rice starch only)
02 03 05	Sludges from on-site effluent treatment (including sludge from production of edible fats and oils, seasoning residues, molasses residues, residues from production of potato, corn or rice starch only)
02 04	Waste from sugar processing
02 04 03	Sludges from on-site effluent treatment; sludges from the processing of sugar
02 05	Wastes from the dairy products industry
02 05 01	Materials unsuitable for consumption or processing – biodegradable wastes derived from the processing of dairy products only
02 05 02	Sludges from on-site effluent treatment
02 06	Wastes from the baking and confectionery industry
02 06 01	Materials unsuitable for consumption or processing – biodegradable wastes from the processing of materials used in bakery and confectionery
02 06 03	Sludges from on-site effluent treatment; sludges from the processing of materials used in baking and confectionery
02 07	Wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials Wastes from washing, cleaning and mechanical reduction of raw materials – biodegradable wastes from the processing of the raw materials used in the production of such beverages only (wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa))
02 07 02	Wastes from spirits distillation – spent grains, hops and whisky filter sheets and cloths, yeast and yeast like residues, sludge from production process, or malt husks, malt sprouts, yeasts and yeast-like residues only

02 07 04	Material unsuitable for consumption or processing – biodegradable wastes from the processing of the raw materials used in the production of such beverages only (wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa))
02 07 05	Sludges from on-site effluent treatment – sludges from the production of alcoholic and non- alcoholic beverages (except coffee, tea and cocoa)
03 Wastes from wood processing and the production of panels and furniture	
03 03	Wastes from pulp, paper and cardboard production and processing
03 03 10	Fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
03 03 11	Sludges from on-site effluent treatment other than those mentioned in 03 03 10
04 Wastes from the leather, fur and textile industries	
04 02	Wastes from the textile industry
04 02 10	Organic matter from natural products such as grease and wax
04 02 21	Wastes from unprocessed textile fibres
07 Waste from organic chemical processes	
07 01	Wastes from the manufacture, formulation, supply and use of basic organic chemicals
07 01 08*	Glycerol waste from bio-diesel manufacture from non-waste vegetable oils
15 Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified	
15 01	Waste packaging, absorbents, filter materials, wiping cloths and protective clothing
15 01 01	Paper and cardboard packaging (excluding veneers, plastic coatings or laminates) certified to EN 13432 or equivalent certified compostable standard
15 01 03	Wooden packaging – virgin timber only

15 01 05	Composite packaging meeting EN 13432 or equivalent certified compostable or digestible standard
16 Wastes not otherwise specified in this list	
16 10	Aqueous liquid waste destined for off-site treatment
16 10 02	Untreated wash waters from cleaning fruit and vegetables on farm only
16 10 02	Milk and dairy waste milk from agricultural premises only
16 10 02	Liquor or leachate from a composting process that accepts waste input types listed in these standard rules or composting and anaerobic digestion standard rules only and in compliance with Animal By Products Regulations
16 10 02	Digestate or liquor form an aerobic process that only accepts the waste input types allowed by the AD Resource Framework and meets the Animal By-Products Regulations
19 Wastes from waste management facilities, off-site waste water treatment plants and preparation of water intended for human consumption / industrial use	
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation
19 02 03	Premixed wastes composed only of non-hazardous wastes (must only come from the input types allowed by this resource framework and be segregated from and uncontaminated by any other waste types.)
19 02 06	Sludges from physico/chemical treatment other than those mentioned in 19 02 05 (must only come from the physical treatment or pH adjustment of the input types allowed by this resource framework and be segregated from, and uncontaminated by, any other waste type)
19 02 10	Glycerol not designated as hazardous – excludes 19 02 08
19 05	Wastes from aerobic treatment of solid wastes
19 05 01	Non-composted fraction of municipal and similar wastes
19 05 02	Non-composted fraction of animal and vegetable wastes
19 05 03	Off-specification compost
19 06	Waste from the anaerobic treatment of waste

19 06 03	Liquor from anaerobic treatment of municipal waste (must only come from the input types allowed by this resource framework, must come from a facility that is independently certified as complying with BSI PAS 110, must be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency and must not contain wastes that come from mechanical biological treatment facilities.)
19 06 04	Digestate from anaerobic treatment of municipal waste (must only come from the input types allowed by this resource framework, must come from a facility that is independently certified as complying with BSI PAS 110, must be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency and must not contain wastes that come from mechanical biological treatment facilities.)
19 06 05	Liquor from anaerobic treatment of animal and vegetable waste (must only come from the input types allowed by this resource framework, must come from a facility that is independently certified as complying with BSI PAS 110, must be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency and must not contain wastes that come from mechanical biological treatment facilities.)
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste (must only come from the input types allowed by this resource framework, must come from a facility that is independently certified as complying with BSI PAS 110, must be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency and must not contain wastes that come from mechanical biological treatment facilities.)
19 08	Wastes from wastewater treatment works
19 08 09	Grease and oil mixture from oil and water separation containing only edible oils and fats
19 08 12	Sludges from biological treatment of industrial waste water (from a process that treats wastes which are listed in these standard rules only)
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 (must only come from the input types allowed by this resource framework, be segregated from, and uncontaminated by, any other waste type and be biodegradable waste).
20 Municipal wastes (household waste and similar commercial, industrial and institutional wastes) not including separately collected fractions	
20 01	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions)
20 01 01	Paper and cardboard (excluding veneers, plastic coatings or laminates) meeting EN 13432 or equivalent certified compostable or digestible packaging only

20 01 08	Biodegradable kitchen and canteen waste containing compostable plastics meeting EN 13432 or equivalent certified compostable or digestible packaging (Category 3 ABPR waste only)
20 01 25	Edible oils and fats
20 02	Garden and park wastes (including cemetery waste)
20 02 01	Biodegradable waste
20 03	Other municipal wastes
20 03 01	Mixed municipal waste – only separately collected biodegradable wastes of types listed within this table
20 03 02	Waste from markets, allowed only if source segregated biodegradable fractions, such as plant material, fruit and vegetables

Both solid and liquid biodegradable organic waste are delivered exclusively by road vehicles to site. There is no use of rail or canal transport for this operation.

Waste delivery vehicles follow approved access routes to the respective reception and treatment buildings to minimise exposure to sensitive receptors and reduce potential impacts during transit.

Deliveries can be received on site 24 hours a day, 365 days a year. The business model of the waste transfer and treatment activity is based on blending the waste to produce a “soup” and transferring it off site as quickly as possible.

The types and volume of waste stored on site at any one time are displayed in Table 3 below.

Table 3 - Material Stored on Site

Potentially pest generating material (any solid, liquid or gas)	Maximum quantity on site at any given day (tonnes per day or litres per day)	Maximum time held on site (hours or days)	Location of materials on site	Additional comments
Solid biodegradable organic waste	600 tonnes	24 hours	Solid waste reception / treatment building	Waste could be up to 72 hours old
Liquid biodegradable organic waste	1,050 m^3	24 hours	Liquid waste reception / blending building	Waste could be up to 72 hours old

4.3 Storage and Treatment Areas

The site contains a large, inverted L-shaped building which is split internally into three buildings. The northern portion of the building which runs in a north to south orientation is the solid biodegradable waste reception and processing building i.e. Zone 1. The floor of this portion of the building is constructed of impermeable concrete and features a sealed drainage system. Solid biodegradable organic waste is deposited onto the floor of this zone of the building, on either side of a concrete waste bay / separating wall. Storage time for this solid waste will not exceed 24 hours and shall not be stockpiled in a quantity that exceeds a total of 600 tonnes before being loaded into one of the two attritors for depackaging and particle size reduction. Waste liquid collected in the sealed drainage system is added to the waste from the attritors as required to produce a pumpable material. Those wastes received which are unsuitable for processing or not permitted under the bespoke environmental permit are rejected in line with the site's waste rejection procedure. Any minor contaminants within larger loads, such as metal, or waste packaging are stored within one of two covered 40-yard roll-on / roll-off (RoRo) skips. Once the skip is full, the waste materials are removed from site for treatment at a suitably licenced facility. The maximum period this material will be stored for is 1 week. The skips are stored in the solid waste reception / treatment building. This building features a roller shutter door, which is only opened to allow vehicles to enter or exit the building. The maximum amount of time the solid waste is stored prior to treatment is 24

hours. Due to the enclosed nature of the storage of solid waste inside a building with manually operated roller shutter doors, the risk of pest infestation has been minimised.

Liquid biodegradable organic waste is stored in the adjoining liquid waste reception building. There are 6No. liquid waste storage tanks, each with a capacity of 55m^3. These tanks, along with the mixing tank and batch tank are located in a bunded tank farm which offers secondary containment in line with the CIRIA C736 guidance. Additionally, there is a 60m3 sled-contained bunded water storage tank located outside but adjacent to the bunded tank farm. This tank stores mains water and wash water and will serve as a buffer for the liquid to operate the attritors. Vehicle tankers carrying waste shall reverse into the liquid waste reception building via the fast-acting roller shutter door, which is again only opened to allow vehicles to enter and exit the building. The vehicle tanker connects to the liquid storage tank via a hose, pump and valve to unload the liquid. The floor of the liquid waste reception building is constructed of impermeable concrete. There is 2m^3 sump at the back of the building to capture any spillages or leaks during the unloading process which will then be pumped into the storage tanks. A Waste Organics operator shall ensure that the liquid waste is being pumped into a tank with capacity to store all the liquid waste in the vehicle tanker. The bunded tank farm also contains a 2m^3 sump to store any spillages within the bunded area. Liquid waste is stored for a maximum of 24 hours on site prior to blending. Due to the liquid waste storage tanks being sealed and material being transferred through sealed pipes inside a building with manually operated roller shutter doors, the risk of pest infestation has been minimised.

4.4 Infrastructure and Housekeeping

Good housekeeping practices on site will minimise the risks of pests on site. These will include:

- The appropriate storage of waste at the end of each working day;
- Regular inspection of drainage system and cleaning when deemed necessary;
- General housekeeping and inspection procedures maintained;
- Ongoing maintenance of site plant and machinery;
- General housekeeping and inspection procedures maintained; cleaning and disinfection of all surfaces that come into contact with waste (including containers) on a regular basis; and,
- Maintaining the clean and dirty areas of the solid and liquid biodegradable organic waste treatment buildings in order to comply with ABP regulations. Wheels of waste delivery vehicles are washed and disinfected before leaving the reception building and footwear washes are provided at the exits of the building.

5.0 PEST PATHWAYS

5.1 Flies

Although most adult flies stay close to their breeding sites (putrescent waste), a proportion will disperse away and may cause problems at receptors. Houseflies are capable of dispersing over several kilometres, although problems seldom occur at distances greater than 2-3 km from the source. Significant problems likely to cause unacceptable nuisance levels tend to occur within 500m of the source.

Dispersal factors can vary, but high levels of fly breeding at the source are what normally appears to result in high dispersal levels. Dispersal appears to be greater in calm, warm weather. A specific event, such as opening of poultry houses in preparation for removing manure, allows rapid dispersal which can cause a sudden increase in flies.

The liquid and solid biodegradable waste is stored within an enclosed building with a roller shutter door that is only opened to allow vehicular access and egress. Waste is stored for a maximum of 24 hours before treatment. Liquid biodegradable waste is stored in sealed waste storage tanks and transferred via sealed pipes. All of these actions help to minimise pathways for flies. The site has also implemented a full Odour Management Plan which outlines the mitigation measures in place on site to minimise Odour Emissions.

5.2 Vermin

Vermin are generally attracted to sewers, culverts, pipes and areas of abundant vegetation. Vermin are also very attracted to odours from food waste which is stored and treated on site.

The site utilises a maintenance record sheet to demonstrate all maintenance activities are checked off on a daily or weekly basis. All areas of the site including the concrete surfacing, pipework, walls, doors, roods and joints are inspected on a weekly basis as part of the site walkaround. If presence of pests is detected, this will be reported to the site manager for investigation. The site manager will contact the site pest control contactor to carry out an investigation and extermination if necessary. The site has also implemented a full Odour Management Plan which outlines the mitigation measures in place on site to minimise Odour Emissions. Please see Section 4.4 above for the site's housekeeping practices. All of the above help to minimise pathways for vermin.

5.3 Birds

Birds are often found at sites where they can readily scavenge food and are capable of readily dispersing over significant distances and can create nuisance in the local areas.

The liquid and solid biodegradable waste is stored within an enclosed building with a roller shutter door that is only opened to allow vehicular access and egress. Waste is stored for a maximum of 24 hours before treatment. Liquid biodegradable waste is stored in sealed waste storage tanks and transferred via sealed pipes. All of these actions help to minimise pathways for birds.

5.4 Pest Impact

There are a number of potential impact of pests on the premises and receptors located around site. These are set out in Table 4 below.

Table 4 - Potential Impacts of Pests

Pest	Impact
Flies	Visual – negative associations as unhygienic, flies are most likely to transmit disease through contact, walking on food or a food-preparation surface, after contact with waste.
	Nuisance – disruption, annoyance, irritating, unpleasant
Vermin	Fear, spread of disease
	Damage to buildings / property
	May attract birds
Birds	Visual – negative association with scavenging
	Noise – circling in the area and feeding
	Health & safety – bird droppings can cause: Histoplasmosis (respiratory difficulties), Cryptococcosis (flu, fever and sometimes fatalities), Ornithosis (flu type disease, can cause fatalities) and Campylobacteriosis (can cause diarrhoea or dysentery syndrome, mostly but can also include cramps, fever and pain).

6.0 FLY CONTROL

6.1 Fly Species

Identifying the fly can help locate its source and so trigger targeted measures to eliminate that source on site. The types of flies that can be expected to be present on site are set out in Table 5 below.

Table 5 - Examples of fly species possibly found on site

Picture	Name	Description	Key Notes
	Common house flies (CHF) *(Musca domestica)* **Can cause widespread and severe nuisance for receptors**	Larvae occur in poultry, pig, and calf manure and in refuse. Flies associated mainly with waste sites / poultry units Prefer warm environments	Fly at human head height Rest on "push walls" 6 – 7mm in length. Adult readily disperses and enters distant buildings. When at receptor site, alights on food, people and surfaces.
	Lesser house flies (LHF) *(Fannia canicularis)* **Can cause widespread and severe nuisance for receptors**	Larvae occur in poultry manure and in refuse. Associated mainly with waste sites / free range laying poultry units	Adult readily disperses and enters distant buildings. Fly at ceiling height Prefer cooler environments Attracted to fresh manure 3.5 to 6mm in length
	Blue Bottle *(Calliphora vomitoria)* Green Bottles *(Lucilia sericata)*	Can cause problems for WTS, MBT sites and are also common at Landfill sites.	Blowflies do not disperse or enter buildings to the same extent as houseflies. Typically crawl over the surface of putrescent, malodorous waste. 10 – 12 mm in length

	Black Dump fly *(Hydrotaea aenescens)*	Preference for waste sites in particular WTS & MBT	Breed in waste/manure/decaying organic matter

6.2 Operational Control – Appropriate Measures

There are a range of appropriate measures potentially available for fly control at permitted sites. Some are preferred measures whilst others should be a last resort.

The Control of Substances Hazardous to Health (COSHH) Regulations 2002 impose a requirement to consider using non-hazardous pest control techniques in preference to potentially harmful insecticides. Where suitable techniques exist, proactively preventing fly problems is a more effective and sustainable approach than trying to deal reactively with an established infestation of flies.

It is essential that site staff and pest control contractors have good knowledge and understanding of site-specific fly management and implement the most appropriate strategy and appropriate measures for fly prevention and control.

6.3 Fly Prevention

Solid and liquid biodegradable waste deliveries enter the reception building via the roller shutter door that is only opened to allow vehicular access and egress. Solid and liquid biodegradable waste is stored on site for a maximum of 24 hours before treatment. Storage of waste materials within a building (and within storage tanks in the case for liquid biodegradable wastes) minimises contact with direct sunlight ensuring that temperatures of material are kept as cool as possible which prevents the presence and breeding of flies. General housekeeping and inspection procedures are maintained on site including the cleaning and disinfection of all surfaces that come into contact with waste (including containers) on a regular basis. Additionally, wheels of waste delivery vehicles are washed and disinfected before leaving the reception building and footwear washes are provided at the exits of the building. The maintenance of the drainage system on site is detailed in the site's Containment and Drainage Plan.

Toolbox talks are utilised on site to provide internal refresher training on top of the induction training to reaffirm operatives understanding of the importance of fly prevention, monitoring

and recording fly-infested loads. The site liaises with a pest control company to arrange routine inspections and mitigation if presence of pests is found.

The site has implemented a full pre-acceptance procedure which states that the following information is attained and recorded prior to acceptance on site:

- details of the waste producer including organisation name, address and contact details
- source and nature of the waste
- a description of the waste including its physical form
- check on constituents declared by waste producer/holder to ensure Permit compliance, treatment plant specification and final disposal
- any hazardous characteristics
- type of packaging and risks of contamination
- age of the waste
- colour
- pH
- presence, strength and description of odour assessment (note COSHH implications)

Additionally, Waste Organics shall obtain a representative sample and analysis of a waste if any of the following apply:

- the chemical composition or variability of the waste is unclear from the information supplied by the customer
- there are doubts about whether the sample analysed is representative of the waste
- the waste is to be treated on site

A representative sample and analysis is not required if any of the following apply:

- the waste is packaged food waste from food manufacturers or food retailers – however, confirmation of its origin is required and there must be sufficient information to understand if it will affect the treatment process;
- the waste is biodegradable agricultural waste direct from the agricultural premises - however, confirmation of its origin is required and there must be sufficient information to understand if it will affect the treatment process.

Therefore, even prior to the acceptance of biodegradable waste onto site, the pre-acceptance procedure will determine if the load is infested or contaminated with flies. Additionally, the

site has implemented a full waste acceptance procedure which states that the following occurs at the weighbridge where possible:

Upon arrival on site, waste loads will:

- be weighed or use the WTN to find tonnages, unless alternative reliable volumetric systems linked to specific gravity data are available;
- not be accepted into site unless sufficient storage capacity exists and site is adequately manned to receive waste;
- have all documents checked and approved, and any discrepancies resolved before the waste is accepted; and,
- have any labelling that does not relate to the contents removed before acceptance on site.
- Where possible, visual confirmatory checks should be undertaken before offloading where safety is not compromised. An inspection must in any event be carried out immediately upon offloading at the site.

If contamination / infestation is identified, the non-conforming waste material will be quarantined and disposed of in accordance with the regulations. Should the contamination levels be too high (i.e. greater than 5%), the load shall be rejected. Site operatives will utilise the waste rejection procedure in the event that the site has to refuse a load for disposal due to contamination. Should liquid waste be determined to be non-confirming following acceptance, the storage tank that the waste was loaded into shall be isolated and treated as a quarantine tank until the waste is removed and the tank is cleaned. Liquid waste storage tanks are fitted with fill level sensors. Liquid waste carrying vehicles are not accepted onto site should the spare capacity of storage tanks be less than 25%. This prevents vehicle tankers waiting on site and ensures waste is not offloaded without guaranteed capacity.

6.4 Cleaning

General housekeeping and inspection procedures are maintained on site including the cleaning and disinfection of all surfaces that come into contact with waste (including containers) on a regular basis. Additionally, wheels of waste delivery vehicles are washed and disinfected before leaving the reception building and footwear washes are provided at the exits of the building.

6.5 Containment

All liquid biodegradable waste is transferred, stored and blended in sealed pipework and tanks.

All solid biodegradable waste storage and treatment takes place within a building negative air pressure. Roller shutter doors shall only be opened to allow vehicles to enter or exit the building and all personnel doors shall remain closed when not in use.

6.6 Fly Monitoring and Control

Adult flies - Monitoring of adult fly numbers takes place twice-a-week during March to November using yellow adhesive fly cards against bulk incoming storage areas close to waste, areas preferred by flies.

Cards are replaced weekly and the fly count is recorded as cards are replaced. Counts are used to guide the waste processing and treatment regime.

Larval flies - Regular checks on the floors of waste bays take place as waste is removed. If adult fly counts are higher than usual, then additional larvae checks are to take place. In this scenario, the cleaning regime is adjusted and the removal of the incoming waste through the process is also adjusted to be quicker.

As seen in Appendix 2, there are two fly control units on site. One of the fly units is located adjacent to the attritor hopper and the other fly control unit is situated immediately north of the drainage pit.

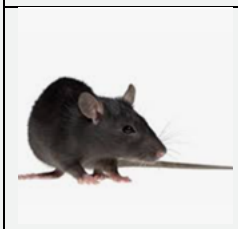
There are also 2 insect monitors / moth traps on site located in the site office and adjacent to the largest mixing tank (494m^3).

7.0 VERMIN CONTROL

7.1 Vermin Species

The types of vermin that may be expected to be present on site are set out in Table 6 below.

Table 6 - Examples of vermin species possibly found on site

Picture	Name	Description	Key Notes
	***The common rat or Brown rat (Rattus norvegicus).***	Larger than the brown rat – 40cm in length but tail shorter than head and body. Blunt nose, small ears.	Brown rats usually prefer ground living and burrowing but they can climb. They are omnivorous and are attracted to food waste.
	***Black rat (Rattus rattus)***	Black rat (16 – 24cm in length / tail longer than head and body. Much smaller than the brown rat. Pointed nose, large ears and slender body.	Quite rare in the UK and usually found at ports. They are omnivorous and are attracted to food waste.

7.2 Vermin Prevention

Solid and liquid biodegradable waste deliveries enter the reception building via the roller shutter door that is only opened to allow vehicular access and egress. Solid and liquid biodegradable waste is stored on site for a maximum of 24 hours before treatment. The maintenance of the drainage system on site is detailed in the site's Containment and Drainage Plan. Toolbox talks are utilised on site to provide internal refresher training on top of the induction training to reaffirm operatives understanding of the importance of vermin prevention, monitoring and recording contaminated / infested loads. The site liaises with a pest control company to arrange routine inspections and mitigation if presence of pests is found. The waste pre-acceptance and acceptance procedures apply to vermin also. Please see the site's detailed Waste Acceptance Procedure.

7.2.1 Rats

Like all animals, rats need food to survive. Baiting programs often fail because the bait can't compete with the rats' regular food. The rats simply ignore the baits or cache them. Reducing

the rats' normal food encourages them to feed on any rodenticide baits placed in their territory. Food availability is immediately available within the waste reception building during the receipt of solid biodegradable wastes for processing. The following controls are implemented to maintain sanitary conditions within the reception building:

- Biodegradable waste is processed as soon as possible but within 48 hours so that none is left within the reception hall for extended periods of time.
- The waste reception hall is cleaned down regularly to clear any loose remnants of biodegradable waste.

The reception area is covered in concrete surfacing which cannot be gnawed by rats. In support of general management techniques for the prevention of rat infestation, given the nature of the material being processed on site, bait boxes are deployed in order to control and count rat numbers.

There are 18No. internal bait boxes and 22No. external bait boxes situated around site as seen in Appendix 2, which are baited and inspected regularly. These contain poison and are also designed to prevent the vermin from escaping the boxes. The bait stations are checked weekly to make sure that rats are taking the bait and that the bait is fresh. Entries are made in the site diary of the weekly inspections to ensure that bait is regularly maintained and number of dead rats are recorded.

Upon detection, bait packs are placed in burrows, in wall voids, and similar protected sites. If a site is damp, then paraffin bait blocks or other water-resistant formulations are used. Once bait is taken, the box is left in place for some time as the rats will consider it to be part of their normal surroundings.

Given the nature of the site, Waste Organics aim to keep the rat population to a low infestation. If signs of a high infestation are observed, then a rat controller will be employed to control the population.

7.2.2 Monitoring of Rats

It is not easy to tell how many rats are infesting a site. As a rough guide, the use of rat indicators are used to characterise the population as low, medium, or high:

Low: In rat-free or low-infestation conditions, no signs are seen. The area either has no rats or was invaded recently by a few.

Medium: With medium infestation, old droppings and gnawings can be observed. One or more rats are seen at night; no rats are seen during the day.

High: When there is a high infestation, fresh droppings, tracks, and gnawings are common. Three or more rats are seen at night; rats may be seen in the daytime.

7.2.3 Scavenging Birds

Due to the containment measures employed on site via the use of sealed pipework and tanks and buildings with roller shutter doors that remain closed unless in use, scavenging birds are not considered an issue on site.

Should scavenging birds become a problem, a pest controller shall be engaged with.

8.0 COMPLAINTS AND REPORTING

Pest infestation and the presence of scavenging birds may be identified either by receipt of complaint from an affected third party, or by detection of pests as a result of the monitoring procedures detailed in this PMP. This section details the site's complaints investigation procedure and how the site will communicate reports with the Environment Agency and interact with the local community where required.

8.1 Complaint Investigation

As part of the company's Management System, a complaints procedure has been implemented. The complaints procedure applies to all complaints, feedback and requests made by third parties regarding operational activities, environmental, health and safety performance or quality of service/product.

All complaints from third parties including external customers, potential customers, statutory authorities, statutory consultees, members of the general public and internal clients will be forwarded to the Site Manager (or designated responsible person) to action as below and record.

Complaints received are logged in the site diary, together with subsequent investigation details and actions taken, by the Site Manager (or designated responsible person). Records are stored at the site office.

The Site Manager (or designated responsible person) will ensure that:

- The complaint is investigated to identify the cause, if necessary this may involve direct communication with the complainant
- In the event of elevated levels of pests being detected, the presence of 'abnormal' on-site activity is assessed and if necessary immediate reactive measures will be implemented and corrective action taken that will prevent a reoccurrence of the same problem. These actions must be documented.
- The Complainant will be contacted and given information on the investigations conducted and actions taken as appropriate.
- All complaints are also reported to Company Directors and discussed at site meetings.
- Details of other complaints are sent to the other Company personnel as appropriate.
- Once the issue has been resolved, the investigation report shall be completed and the issue will be closed.
- Complaints involving a location with Local Authority Contracts will be reported in line with specific Contract requirements and timescales.

8.2 Site-identified Pest Infestations

In the event of a pest infestation being identified by Waste Organics personnel, the event will be reported to the Site Manager and it will be logged in the Site Diary and then investigated and actioned in a similar manner as above.

8.3 Internal Review

The completed Investigation Reports are distributed throughout the company for review at operational, management and health & safety meetings, as applicable.

Any required updates to site procedures or activities covered within this Pests Management Plan will also require an immediate review and update to the PMP.

In any circumstance, the PMP will always be reviewed annually from date of issue to ensure that controls described are current and sufficient.

8.4 External Reporting

The Site Manager will report a pest infestation complaint/event to the Environment Agency if stipulated within the Environmental Permit.

Complaints involving a location with Local Authority Contracts will be reported in line with specific Contract requirements and timescales.

External complainants will be contacted and given information on the investigations conducted and actions taken as appropriate following completion of the actions.

8.5 Community Engagement

The site maintains an open channel with neighbouring businesses, residents, and community representatives. Communication methods include:

- Email or phone contact for complaints or enquiries.
- Periodic updates/newsletters for local stakeholders where appropriate.
- Availability of the site manager for meetings or discussions regarding pests management.

Engagement is proactive and responsive, ensuring community concerns are addressed promptly and respectfully. Feedback received is reviewed alongside complaints and pests monitoring records to inform operational adjustments and PMP improvements. This approach fosters good neighbour relationships and can pre-empt complaints through early notification of operational activities that may result in pest activity.

APPENDIX 1 – MONITORING FORMS

Waste Management sites e.g.: Transfer Station, MRFs, IVCs and MBT Plants - Fly Monitoring Record

Site name: Name of person doing monitoring:

Main fly species assessed:

Date	**Adult fly counts (See below)**							**Larval fly counts (See below)**							**Notes (e.g., fresh waste stockpiled, incoming waste infested, etc)**
	1	2	3	4	5	6	av	1	2	3	4	5	6	av	

Adult flies monitored either by:

- Counting fly numbers resting within 1 x 1m squares marked on internal walls, or other suitable areas such as posts or beams, one to three times per week.
- Fly counts on standard 20 x 24cm yellow adhesive fly papers, changed weekly.
- Fly counts using a Scudder Grid on waste, one to three times per week.

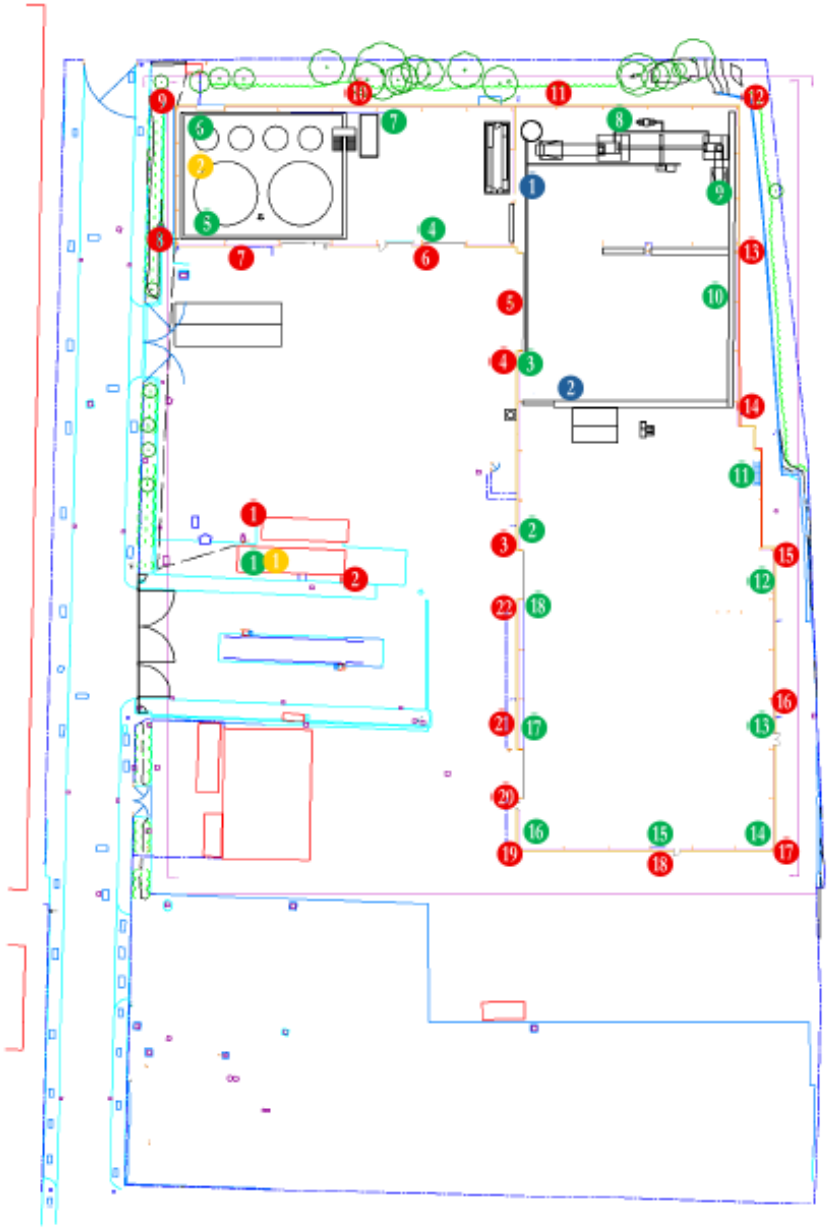
Larval flies monitored by counting the larvae exposed by scraping the surface from an area of c.30 x 30cm of waste.
State chosen monitoring methods for adults and larvae:

Location of monitoring points:

Adults	Larvae
1.....	1.....
2.....	2.....
3.....	3.....
4.....	4.....
5.....	5.....
6.....	6.....

APPENDIX 2 – PEST CONTROL LOCATIONS

Client Name: Waste Organics (Leeds)	
Address: Crossgreen Investments, Cross Green Industrial Estate, Knowsthorpe Rd, Leeds LS9 0NX	
Contract No.: PM0000312	



Drawn By:	F.M		Date Produced: 18/02/2026		
Key	RED – Toxic Rodent Monitors External		GREEN – Toxic Rodent Monitors Internal		
	BLUE – Fly Control Units		YELLOW – Insect Monitors / Moth Traps		
Amount of Internal Units	18	Amount of External Units	22	Amount of Fly Units	2

SureKill Services, Suite C, Cardigan Mills, Lennox Road, Leeds LS4 2 BL
0113 457 4550 I 0800 068 4577 I info@surekill.co.uk I www.surekill.co.uk I Company Number: 15895028