Summary of Management System elements

Operations at the at the Crossgate Drive Clinical Waste Treatment Facility will be audited under Mitie's Environmental Management System during Q1 2025.

The management systems in place at the site are constructed around a range of operational and maintenance procedures that minimise environmental impact while ensuring the safe and reliable operation of the alternative treatment processes for clinical waste and the sustainable operation of the site. A key element of the system is Cliniwaste's bespoke TRACE (Track, Report, Audit, Consign, Educate) tracking tool which offers full end-to-end traceability of waste consignments for all interested stakeholders, from collection, through the treatment process and to the ultimate point of disposal.

The following provides a summary of the key elements of the site's environmental management system.

Environmental Policy.

Cliniwaste has a clearly defined environmental policy and programme covering the operations at its three operational waste management facilities. The policy includes:

- a commitment to continual environmental improvement and to the prevention of pollution;
- a commitment to comply with relevant legislation, and with other requirements to which the organisation subscribes; and
- environmental objectives and key performance indicators to support the continual improvement of the installation, which are themselves subject to ongoing review.

Operational procedures

The management system identifies a range of procedures to facilitate both the safe and reliable treatment of clinical wastes and the sustainable operation of the installation. The procedures include:

- comprehensive waste pre-acceptance and acceptance procedures to ensure that only wastes suitable for alternative treatment are subject to treatment in the installation;
- Cliniwaste's bespoke TRACE tracking system allowing end-to-end tracking of individual waste consignments through the treatment process;
- operating protocols and instructions to control operations that may have an adverse impact on health and safety and on the environment;
- a preventative maintenance programme focused on key plant items designed to ensure both business continuity and the minimisation of environmental impact; and
- documented procedures for monitoring emissions or impacts.

Maintenance

Planned preventative and reactive maintenance is undertaken on all key plant and equipment that could result in an adverse impact on the environment. Failure of plant and equipment and a record of maintenance interventions is logged, and the data is reported to management to facilitate the scheduling of the operation of the installation and to inform future capital expenditure.

Training

Comprehensive training is undertaken by Cliniwaste to ensure that all staff members are aware of the potential environmental effects of the operation of the installation, both under normal and abnormal circumstances. All staff are also provided with awareness training concerning the appropriate management of clinical waste, the need to prevent accidental emissions and the actions to be taken when accidental emissions occur.

More detailed, role-specific training is provided to those employees whose roles have the highest potential environmental impact. Induction training systems are in place for all new employees and contractors and ad hoc training is provided when required to reflect changes in site operations. All staff receive awareness training so that they are aware of the implications of the permit for the site and their work activities and of the need to report deviation from the permit to appropriate responsible individuals. Training will be updated to reflect the variation to both the site and the permit.

Non-compliance

There is a non-conformance procedure detailing the appropriate course of action for handling, investigating, communicating, and reporting instances of non-compliance, including:

- failures in appropriate waste management and segregation and the subsequent quarantining of non-compliant wastes;
- actual or potential non-compliance with operating procedures or emission limits;
- environmental complaints; and

Auditing and reporting

In addition to regular internal auditing; consisting of environmental and health and safety audits. Cliniwaste's environmental management system will become subject to ongoing review and audit by an approved external certification body. Key aspects of the environmental performance of the site are routinely made available to clients and key stakeholders.

Records

Cliniwaste's environmental management system has a clearly defined structure and an established framework for keeping records and documentation including:

- all relevant waste management documentation;
- policies;
- roles and responsibilities;
- targets;
- procedures;
- results of audits; and
- results of reviews.

Area of management system	Specifics	Cliniwaste's implemented control measures
Site infrastructure plan	• storage facilities for hazardous materials like oil and fuel tanks, chemical stores, waste materials • location of items for use in accidents and emergencies, like absorbents for chemical spills • points designed to control pollution, for example inspection or monitoring points. • effluent discharge points	Nottingham site infrastructure plan. Discharge consent license in place with Severn Trent Ltd SVL 204.11
Drainage	Your plan must show your foul and combined drainage facilities marked in red and your surface water drainage facilities marked in blue. It must also show: • the direction of flow of the water in the drain • the location of discharge points to the sewer, watercourse, or soak away • the location of manhole covers and drains • the location of stop and diverter valves and interceptor	Nottingham site drainage plan in place.
Water, gas, electricity	Your plan must show the location of mains water, gas and electricity supplies on your site, including: • the mains water stop tap • gas and electric isolating valves and switches • the routes for gas, electricity, and water supplies around your site - electric wiring and gas and water pipes must be labelled on the plan	Nottingham site infrastructure plan.
Site operations	Break down the operations that will be carried out on your site during start up, normal operation and shut down, into a list of activities and processes, for example unloading waste, storing waste, incinerating waste. For waste, mining waste, and installations, list the waste that will be produced by each activity or process. List the steps you will take to prevent or minimise risks to the environment from each activity or process and type of waste. Be specific about the actions you will carry out to do this. For water discharge and point source groundwater activities, this will normally be the operation of a wastewater treatment works or effluent treatment equipment that is part of your activity and included in the permit	Aspects & Impacts Register Permit Waste acceptance procedure.

Site and equipment maintenance plan	**Site and equipment maintenance plan** You need a plan for how you will maintain the infrastructure of your site and any machinery. You must maintain any machinery according to the manufacturers or supplier's recommendations (for example, following the instructions and guidelines of any manuals that came with your equipment). You will need to record each time you carry out maintenance, for example, each time you check the calibration of monitoring equipment to make sure it meets the manufacturer's recommendations	Minimal machinery is operational within the plant: Any breakdowns are reported by the operator to the site manager, and they will organise the repairs. Maintenance and inspection tracker in place for all assets.
Contingency plans	You need a plan for how you will minimise the impact on the environment of any: • breakdowns • enforced shutdowns. • any other changes in normal operations, for example due to flooding or other extreme weather Read flood planning guidance to help you comply with your environmental permit.	Business continuity plan Nottingham Emergency & Incident Response Plan.
Accident prevention and management plan	You need a plan for dealing with any incidents or events that could result in pollution. The plan must identify potential accidents, for example equipment breakdowns, enforced shutdowns, fires, vandalism, flooding, or any other incident which causes an unexpected change to normal operations, such as bad weather. For each potential incident, it must also state the: • likelihood of the accident happening • consequences of the accident happening • measures you'll take to avoid the accident happening • measures you'll take to minimise the impact if the accident does happen	Accident and incident reporting procedure Nottingham site infrastructure plan.

	Your accident plan must also say how you will record, investigate and respond to accidents or breaches of your permit. Your accident plan must also include: • the date it was reviewed • when it will next be reviewed • a list of emergency contacts and how to reach them • a list of substances stored at your site, and your storage facilities • forms to record accidents on	
Complaints procedure	You need a procedure that records: • any complaints you receive in relation to activities covered by your permit (for example complaints from neighbours about noise, Odour or dust from your site) • how you investigate those complaints • any actions taken as a result of complaints	Compliments & Complaints Procedure Odour Management Plan
Managing staff competence and training records	You need to have enough staff and resources to make sure the site is run effectively to comply with your permit. Your management system needs to explain who is responsible for what procedures and who is technically competent. For each of your managers, staff and contractors make a list of any roles they carry out that relate to activities covered by your permit. You will also need a procedure to: • check your staff and contractors have taken the training or qualifications required for the work they do • record any training, refresher training or qualifications taken by your staff or contractors If you have a permit for a waste, mining waste or installations permit you also need to look at legal operator and competence requirements.	Organisation, Structure, Roles & Responsibilities Training Matrix COTC holders.