

# WEALDEN WORKS 3Rs PERMIT VARIATION APPLICATION

## Appendix R: Pest Management Plan

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Wealden 3Rs Pest  
Management Plan  
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12 October 2020

## Quality Management

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## Drawings

**Drawing 1** Pest Control Measure Locations – to be inserted once agreed

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# 1 INTRODUCTION

## 1.1 Purpose

1.1.1 This pest management plan (PMP) has been developed to set out procedures for management of pests during the operation of the Wealden Works Recycling, Recovery and Renewable Energy (3Rs) Facility. This version of the plan has been drafted at an early stage of the project and therefore sets out commitments to further updates prior to the facility coming into operation.

## 1.2 Responsibility

1.2.1 It is the responsibility of Britaniacrest Recycling Ltd ('Britaniacrest') to ensure that the requirements of this document are adhered to.

1.2.2 Britaniacrest is responsible for ensuring that this PMP is carried out and that appropriate procedures and other controls are in place.

1.2.3 All site personnel are responsible for ensuring that they comply with procedures and/or other controls made under this PMP.

## 1.3 Training

1.3.1 Training in relation to pest management will be provided to ensure:

- Relevant nominated staff are trained on the aspects of this PMP as it relates to their role;
- Staff are trained in the key areas with regard to the significance of pests;
- Materials are available to promote pest awareness and to reiterate the need for vigilance and due diligence with regard to containment and housekeeping; and
- Training is documented and a schedule is maintained for nominated individuals and the need to retrain/refresh training.

1.3.2 Where require advice will be sought from third party specialists to inform training (see section 1.4)

## 1.4 Competent Advice

1.4.1 The site shall retain suitable independent, competent advice sources relating to pest nuisance, monitoring of pest numbers and best practical means for controlling pest numbers. This will be secured with a qualified third party Pest Control Specialist prior to commencing commercial operation of the Wealden Works 3Rs facility.

1.4.2 Once the facility is constructed the appointed Pest Control Specialist will advise on specific pest controls for the site and those agreed measures will be incorporated into this plan.

1.4.3 As required, the Pest Control Specialist will provide the Site Manager with a summary of the results of any investigation and of advice provided to the relevant environmental regulator.

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## 2 SOURCES AND CONTROLS

2.1.1 Potential sources of pests at the site have been identified as:

- Birds;
- Rodents; and
- Flies.

2.1.2 The transfer, storage and treatment of waste has the potential to attract and introduce pests to the site.

### 2.2 Prevention and Containment

#### Incoming loads

2.2.1 It will be a contractual requirement that all vehicles are covered when transporting waste.

2.2.2 All waste deliveries will be within buildings. Incoming loads will be directed to an available door to the tipping hall, which will be automatically operated upon approach.

2.2.3 Where site management identifies a load as being pest infested whilst it is being tipped, releasing pests into the waste tipping hall or processing hall, if the infestation cannot be dealt with by personnel on site using normal implemented measures, the Pest Control Specialist will be contacted to attend the site as quickly as possible to advise on the best course of action.

2.2.4 Where an infested load has been accepted, the Site Manager will liaise with the prior waste holder/producer to make them aware.

2.2.5 Any such occurrence will be recorded and actions taken to manage where loads continue to be delivered, implementing the advice of the Pest Control Specialist when given. This will be documented and increased monitoring will be carried out until the Site Manager is satisfied that pests are effectively controlled.

2.2.6 If necessary, more detailed procedures will be put in place prior to commencing operation of the facility and taking into account advice from a suitably qualified third-party Pest Control Specialist.

#### Waste spill handling in tipping hall

2.2.7 An on-site operative will be made available to clear any spillages as soon as is practicable and as a matter of urgency. It will be the Site Manager's responsibility to ensure that an individual is nominated to take on tipping hall and waste processing hall cleaning as quickly as possible, following a spillage. Detailed procedures will be put in place prior to commencing operation of the facility and taking into account advice from a suitably qualified third-party Pest Control Specialist as required.

#### Tipping hall and waste processing hall management

2.2.8 The waste tipping and processing halls will be managed as set out in the waste management procedure which will be put in place prior to commencing operation of the facility.

2.2.9 Contractual arrangements will dictate when material can be delivered; nevertheless, the waste tipping hall and waste processing hall will be cleared each evening under normal procedures.

2.2.10 The tipping hall and waste processing hall will be monitored via the control room at all times during operational hours. Control room staff will be sufficiently trained to identify where capacity is limited and raise this with operational management to help manage incoming loads.

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## ERF bunker management

- 2.2.11 The energy recovery facility (ERF) bunker will be managed as set out in the bunker management procedure, which will be put in place prior to commencing operation of the facility. The bunker has been designed to contain up to 5 days' storage capacity. Any waste in the ERF will be subject to high temperature processing which will eliminate any pests that may be present in the waste.
- 2.2.12 The bunker will be monitored via the control room at all times during operational hours. Control room staff will be sufficiently trained to identify where capacity is limited and raise this with operational management to help manage incoming loads. Such monitoring will assist in the suppression of pest infestation should it occur.

## Storage/recovered materials building management

- 2.2.13 The storage/recovered materials building will contain processed wastes awaiting transfer off site for recovery or disposal. The procedure for managing this building will be put in place prior to commencing operation of the facility. The same overall procedures for pest control that apply to the main building will also apply to the storage building.
- 2.2.14 Contractual arrangements will dictate when material can be transferred off site; nevertheless processed wastes will typically be stored in the storage/recycling building for no more than 7 days.

## Building containment and doors

- 2.2.15 Personnel doors will be fitted with suitable door closers and will be kept shut at all times except when being used by a person to enter or leave a building.
- 2.2.16 Tipping hall and waste processing hall doors will be maintained to minimise the occurrence of failures and jams. The procedures to follow should a door jam or damage occur, include:
- Ensure damaged door is rendered "out of service" and all remaining doors are used instead;
  - Manually close any jammed or damaged doors as soon as practical;
  - Reporting of any damaged or jammed doors will be given priority;
  - Repair works on doors will be given priority;
  - Cover any damaged doors with suitable pest-proof netting or similar as a temporary measure until repair can be arranged; and
  - Ensure a suitable pest-proof net or other screen is in place before any maintenance or repair work which requires a door to be open commence.

## General Site Housekeeping

- 2.2.17 Operatives will be employed on site to prevent waste build-up both inside and outside buildings, tackling:
- Windblown litter/debris;
  - Waste spill in the tipping hall;
  - Waste spill in the waste processing hall;
  - Managing dust build-up in refinement;
  - Litter picking at boundaries;
  - Ensuring bins are closed and/or covered; and

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- Ensuring external doors are kept closed except for access/egress.

## Maintenance

- 2.2.18 The buildings in which waste is stored and handled will be new and will have been designed to be secure and minimise permanent openings of sufficient size to allow access by birds. Visual inspection routines will ensure that buildings remain in good working order and should a failure of the building materials be identified; priority will be given to securing the building to avoid access by pests
- 2.2.19 Specific measures where required, such as netting, will be put in place prior to commencing operation of the facility and taking into account advice from a suitably qualified third-party Pest Control Specialist. In the case of birds, the Bird Hazard Management Plan will apply.

## 2.3 Controls

- 2.3.1 Prior to commencing operation of the Wealden Works 3Rs facility, advice from the specialist Pest Control Specialist will be sought to establish suitable chemical controls, such as lavacide spray or toxic bait, non-chemical controls such as fly paper and suitable locations for these controls.

## 2.4 Monitoring

- 2.4.1 Pest monitoring points will be located in the areas recommended by the Pest Control Specialist. It is likely that these locations will include:
- Externally around the site perimeter;
  - Tipping hall;
  - Waste processing hall;
  - ERF bunker; and
  - Storage/Recycling building.
- 2.4.2 A plan identifying the agreed locations of pest monitoring points will be appended to this PMP once the locations have been agreed.
- 2.4.3 Results from the above monitoring points will be analysed by the competent person on site and if required, a suitable specialist. The following details will be recorded:
- Pest numbers at each monitoring point; and
  - Pest species recorded at each monitoring point.
- 2.4.4 In the event that increased pest activity is noted, the need for toxic baits or additional stations will be reviewed and in accordance with the advice from the Pest Control Specialist, recommendations will be implemented.
- 2.4.5 The suitable competent advice source will comment on the results of monitoring including on:
- Any apparent trends in pest numbers and species;
  - Any apparent links with activities on site where relevant; and
  - Any apparent environmental conditions where relevant.
- 2.4.6 Records of such monitoring will:
- Be kept for at least five years;
  - Be given in synopsis at liaison committee meetings; and
  - Be used as an information input into the site potential improvements programme.

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## 2.5 Review of Controls

- 2.5.1 This PMP, and its supporting site procedures, will be reviewed in the event of changes in pest activity and, where required, revised on the basis of:
- Pest monitoring and complaint information;
  - Outcomes of liaison meetings;
  - Items from the site potential improvement programme which are to be enacted and used;
  - At the behest of the regulator; and
  - Any other relevant information sources.
- 2.5.2 An initial update to the document will be made to incorporate the specific requirements identified by the Pest Control Specialist. This update to the PMP will be available prior to the Wealden Works 3Rs facility coming into operation.
- 2.5.3 Revisions shall be submitted to the EA for approval prior to introduction and implementation.
- 2.5.4 Superseded management plans will be retained and archived in site files for at least five years in accordance with the EMS.



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## 3 REPORTING AND COMMUNICATION

### 3.1 Complaints Handling

- 3.1.1 All complaints received will be investigated, whether received directly or via a third party such as a regulator. When a complaint is received by site management, an investigation will be conducted to consider the circumstances and that all appropriate preventative measures and controls are in place as required by this PMP. A separate Complaints Procedure will be in place detailing the complaints process and is appended to the facility Noise Management Plan (NMP).
- 3.1.2 Details of the investigation, outcomes and any notable events/incidents that may have given rise to an escalation in pest numbers will be recorded in the site diary and reported to the Site Manager. A written record of the complaint will be made using the complaints form as detailed in the Complaints Procedure. Site staff will be made aware of the location of complaints forms as part of their induction.
- 3.1.3 Complaint information will be elevated to Senior Management and relevant internal individuals for further recording, monitoring and investigation. A summary of complaints will be provided to the Site Manager at the end of every month. Copies of such reports will be shared with Senior Management.

### 3.2 Local Communications

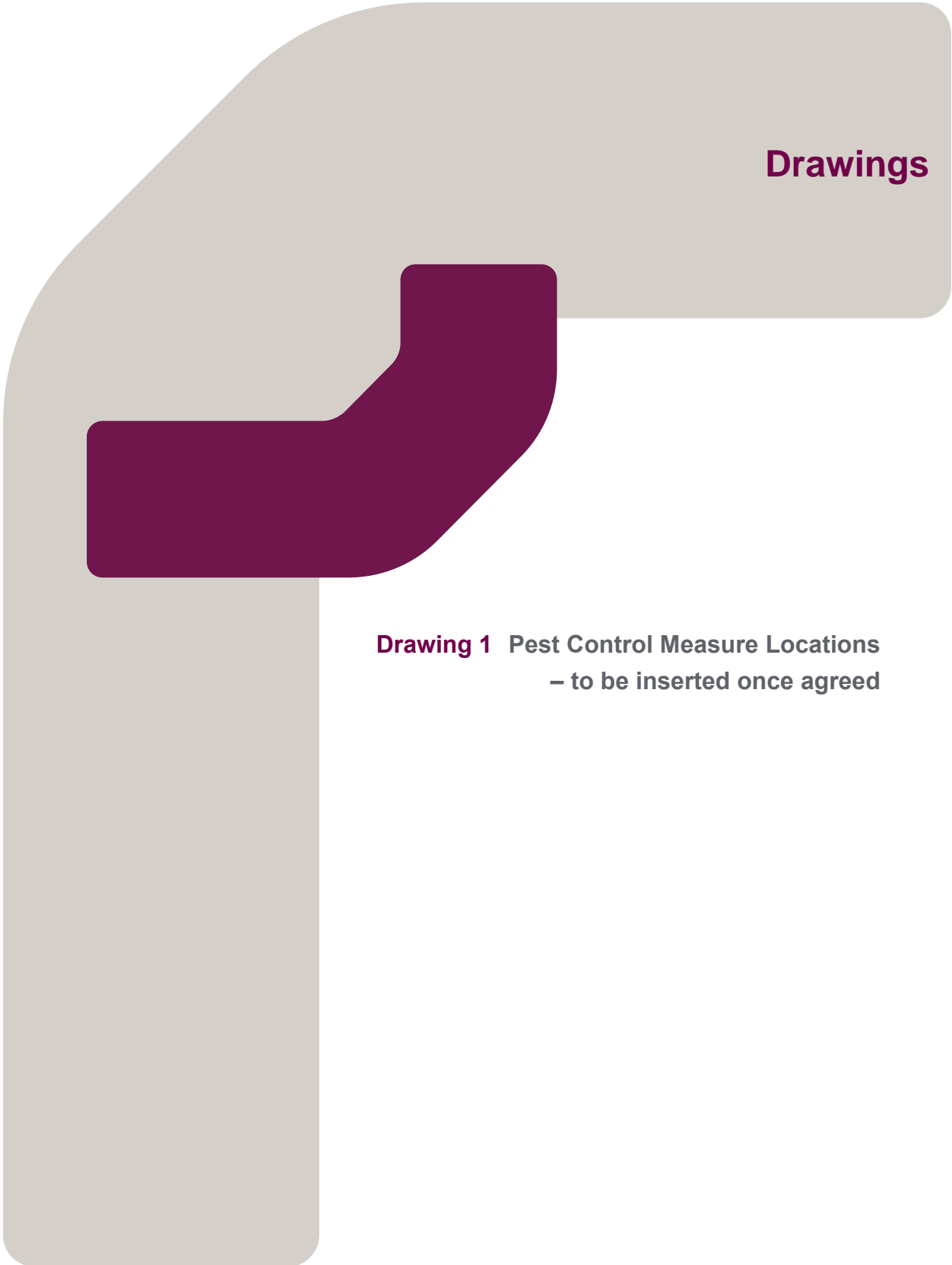
- 3.2.1 A Community Liaison Group has been established to communicate with local residents. A copy of the constitution can be found appended to the NMP for the facility.. As necessary this will cover any concerns about pest management at the facility.

### 3.3 Continuous Improvements

- 3.3.1 The site will compile and maintain an improvements schedule listing the improvements being considered and/or being progressed by site to enhance pest control. As a minimum, this list/programme will include potential improvements raised by:
- A suitable competent advice source employed by the site;
  - Relevant environmental regulators; and
  - Site management, other site personnel or relevant employees.
- 3.3.2 Where the suitable competent advice source advises changes to the Plan that represents best practical then the Facility management consider it, and if practical, economic and within the site permit and other legal and regulatory constraints, will be open to trialling it. Where any such trial is successful and the proposed control represents best practical and economic means then site will put such measures in place and review this PMP and any associated site procedures accordingly.

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## Drawings



**Drawing 1** Pest Control Measure Locations  
– to be inserted once agreed