Recycling and recovery UK

Newquay

Household Waste Recycling Centre (HWRC)

1.5 Business Continuity and Contingency Plan

December 2025

General

DOCUMENT DETAILS

Document title	Newquay HWRC 1.5 Business Continuity and Contingency Plan
Version	1.0
Date	December 2025
Prepared by	Katie Heath – Environment Permit Manager
Reviewed by	Geraldine Guiguet-Doron – Senior Environmental Permit Manager Andrew Jones - Environment & Industrial Risk Manager Jon Davis – Operation Manager
Approved by	Craig Mouatt – Regional Manager
Distribution	SUEZ – Site Copy SUEZ – Environment & Industrial Risk Department Environment Agency

DOCUMENT REVIEW HISTORY

Date	Version	Summary of Changes
December 2025	1.0	Original document to support environmental permit application for a HWRC

1 INTRODUCTION

1.1.1 This document details how SUEZ will:

- Minimise the environmental impact of major changes to normal operations. Minor changes are covered as part of the site Operations Management Plan (Document reference 1.2) and Accident Prevention and Management Plan (Document reference 1.4) and as part of SUEZ's standard maintenance and operational procedures; and
- Comply with Contract and Authority requirements (where relevant) in relation to business continuity and contingency planning.

1.1.2 The plan outlines an assessment of external and internal risks, the critical areas of the service and how they can be protected, how contingencies are arranged and how service can be recovered.

1.1.3 Details of specific roles and responsibilities are laid out as well as incident management plans, emergency action plans and all other related documents.

1.1.4 Although this document cannot detail every event and every scenario, broadly it will show SUEZ's site staff the steps to be taken in situations where business continuity is threatened, and contingency action is required.

1.1.5 This plan will be reviewed following each implementation of the Business Continuity and Contingency Plan (document reference 1.5) to incorporate learning and experience from planned and unplanned outage events.

1.1.6 The steps outlined in this document will be shared with relevant parties. This includes internal stakeholders (e.g., commercial teams and communications teams), external stakeholders (e.g., regulators) and third-party customers and clients (e.g., Local Authorities).

2 CRITICAL ACTIVITIES AND SERVICES

2.1 Introduction

2.1.1 This section details the key activities and services that could be affected by any of the scenarios outlined in the subsequent sections, including contractual, operational and commercial responsibilities.

2.2 Contractual

2.2.1 The site operates under a local authority contract and so strict contractual requirements are in place. SUEZ is contracted by Cornwall Council to operate Newquay HWRC, accepting waste household (and similar) waste and from the general public.

2.3 Operational

2.3.1 The site is permitted as a HWRC for the acceptance, storage and onward transfer of household wastes. The site has an annual waste acceptance limit of 25,000 tonnes.

2.3.2 The waste types permitted to be accepted at the HWRC comprise those that would reasonably be expected to arise from households, received directly from members of the public.

2.3.3 The site operates in conjunction with the wider SUEZ Cornwall network, which includes various other HWRCs and transfer stations.

2.4 Commercial

2.4.1 The site does not accept commercial waste but is a key strategic location as part of the Cornwall waste contract.

3 RISK TABLES

3.1.1 The risk is determined by the probability of a hazard occurring and the likely consequences of any impact. The assessment of risk considers the residual risk that remains after implementation of the preventative measures.

3.1.2 Risk assessment definitions and the risk estimation matrix are presented in Appendix A.

3.1 External Risks

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Aviation crash	Site operations and infrastructure, transport routes, linked facilities	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), injury and death, impact on amenity control systems	Low	High	Medium	The site is located around 5km southwest of Cornwall Airport, Newquay. There are multiple transport routes connecting site to customers and offtakes Aviation incidents are very rare in the UK	In the event of a direct or close impact, the site will be closed and incoming vehicles will immediately be diverted to an alternative SUEZ Cornwall facility. Contingency staff can be mobilised to the site to clear residual waste if needed SUEZ's Gold Command incident response will be set up to manage an incident	Low
Train or tram crash	Transport routes, linked facilities	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities), injury and	Low	High	Medium	The site is located approximately 90m south of the Atlantic Coast Line railway line. There are multiple transport routes connecting site to customers and offtakes	In the event of a close impact (impact of primary infrastructure) the site will be closed and incoming vehicles will immediately be diverted to an alternative SUEZ Cornwall facility. In the event of a rail crash impacting secondary infrastructure (roads in the vicinity of the site), alternative routes will be used. Other SUEZ facilities can be used to alleviate the number of vehicles at site.	Low

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
		death, impact on amenity control systems					In the event of the facility's operations being affected by loss of transport routes, then alternative routes and hauliers will be used. Duty of Care checks will be completed on any new haulier used to transport SUEZ's waste.	
Bridge collapse or severe road accident	Transport routes, linked facilities	Physical damage to secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	The site is located close to the A3059 and A392, so major road accidents may affect transport to and from the site However, there are multiple transport routes connecting site to customers and offtakes	In the event of a severe road crash affecting the area, alternative tipping points for outgoing waste will be arranged depending on the situation. Alternative SUEZ facilities will be considered first, with third party facilities being used if a SUEZ option is not feasible.	Low
Industrial explosion	Site operations and infrastructure, transport routes	Physical damage to primary and secondary infrastructure (transport routes, third party facilities), impact on amenity control systems, injury and death	Low	Medium	Medium	The site is not located near any industry that is likely to cause an industrial explosion The facility does not accept explosive wastes, aside from gas cylinders, which are stored in very small volumes.	In the event of an industrial explosion on site, the site will be closed and incoming vehicles will immediately be diverted to an alternative SUEZ Cornwall facility. In the event of an industrial explosion at a nearby facility, an evaluation will take place. If it is safe to keep operating, then this is the preferred option. If not, incoming vehicles will be diverted as per the line above.	Low
Storm or freak weather	Transport routes and site infrastructure	Physical damage to primary infrastructure (site),	Low	Low	Low	The site is not located near a watercourse and is located in	The site is at low risk of flooding from either rivers, the sea or surface water. The nature of the area and the site	Low

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
		secondary infrastructure (transport routes, third party facilities), impact on amenity control systems				Flood Zone 1 so is unlikely to flood Storms and freak weather can affect transport links and potentially the site infrastructure	operation means that significant impact is unlikely In the event of damage to the facility, an assessment will be made and if continued operations are not possible then incoming vehicles will be diverted to an alternative SUEZ Cornwall facility	
Seismic activity	Transport routes and site infrastructure	Physical damage to primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Low	Low	There has been no history of seismic activity in the area	The site has been constructed in line with reasonably foreseeable risks	Low
Protestor action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Low	Medium	Medium	The site is not a high public interest facility There has been no history of protestor action	If protestor action focuses on the site or the surrounding area, then incoming vehicles will be diverted to an alternative SUEZ Cornwall facility If protestor action affects secondary infrastructure, waste will be diverted as necessary	Low
Industrial action	Transport routes and site infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport	Low	Medium	Medium	There has been no history of industrial action	Industrial action could prevent the use of the site and secondary infrastructure (primarily road links). If this is the case, then action will be taken to resolve the dispute but in the meantime, incoming vehicles will be diverted to an alternative SUEZ Cornwall facility	Low

Hazard	Receptor	Harm	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
		routes, third party facilities)						
Disease pandemic	Site operations	Illness and death	Low	High	Medium	A pandemic is an unlikely scenario but has the potential to affect multiple members of staff	Government guidance will be followed, and SUEZ will ensure that appropriate PPE is in place Staff from other SUEZ locations can be used to provide cover SUEZ's Gold Command incident response will be set up to manage the ongoing situation	Medium
Loss of power	Site operations and infrastructure	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Medium	Medium	Medium	Power supply is important but not critical for site operations (the site has no fixed plant and power is primarily used for office functionality and lighting)	In the event of full power loss for a prolonged period, then manual operations would commence, and diesel-powered lighting towers may be hired, as necessary. In the event of full power loss for a prolonged period, if necessary, waste can be diverted to an alternative SUEZ Cornwall facility	Medium
Loss of telecommunications	Site operations	Prevention of use of primary infrastructure (site), secondary infrastructure (transport routes, third party facilities)	Medium	Low	Medium	Telecommunications are important for communication between SUEZ and third parties	If telecommunications are lost, then the site has the ability to function manually in this respect.	Low
Loss of water	Site operations and infrastructure	Impact on amenity control systems, loss of drinking water	Low	Medium	Medium	Drinking water is a legal requirement for site staff	Water is not necessary for operation of the site. In the event of a loss of water supply, then bottled drinking water can be provided to site users	Low

3.2 Internal Risks

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
Fire on site	Site operations and infrastructure, personnel	Physical injury and death, physical damage to site infrastructure, loss of key amenity control infrastructure	Medium	High	High	Fire remains a likely risk at waste management facilities An uncontrolled fire can destroy site infrastructure, rendering the site non-operational	See management controls as outlined in the Fire Prevention Plan	Medium/ Low
Severe accident or personal injury	Site operations, personnel	Severe physical injury or death causing cessation of site operations	Low	High	Medium	Any serious personal injury or death would need to be investigated by the HSE and Police, meaning site operations would temporarily cease	In the event of a serious injury or death, the site would be closed and incoming vehicles will immediately be diverted to an alternative SUEZ Cornwall facility. The EA will be informed, and contingency arrangements will be made depending on the specifics of the situation Contingency staff can be mobilised to the site to clear residual waste if needed SUEZ's Gold Command incident response will be set up to manage an incident	Low
Security threat	Site operations, site infrastructure (including amenity control infrastructure),	A physical or cyber security threat can affect site operations (directly through threats or damage, or indirectly via	Low	Medium	Low	The site uses computer systems and physical measures to control operations	If cyber security threats affect SUEZ's computer systems then manual measures can be implemented to dispatch wastes If a physical threat occurs (e.g., terrorist threat or incident) then waste will be diverted to an alternative SUEZ Cornwall facility	Low

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
	transport routes	disruption to systems)						
Flood	Site operations, site infrastructure (including amenity control infrastructure), transport routes	Floodwater damage to site infrastructure including roller shutter doors, interceptors, roadways	Low	Low	Low	The site is located in in Flood Zone 1 so is unlikely to flood. All power units and electrical systems are fitted above likely flood height	In the unlikely event that the site floods and site operations cannot continue then incoming vehicles will immediately be diverted to an alternative SUEZ Cornwall facility If flood is due to last for over 7 days, then all wastes will be removed from site Flood warning services are used by relevant management staff	Low
Spillage	Site operations, site infrastructure (including drainage infrastructure)	Damage to site surface, drainage system (channels, and interceptor)	Medium	Low	Medium	Due to the nature of a household waste site, minor spills are a likely risk	The site operates with spillage procedures. The site has spill kits placed in strategic locations and staff are trained in their deployment. The site has a shut-off valves to prevent escape of contaminated water in the event of a spillage COSHH sheets are available for any non-waste liquids stored on site. The drainage separators are inspected at least every 6 months and cleaned as required to ensure all fuels and oils are captured	Low
Key plant and equipment failure	Site operations, site infrastructure (including waste handling and amenity	Failure of mobile plant, amenity control systems and fire	Medium	Medium	Medium	Mobile plant is used at site. The equipment is maintained in good condition and serviced under	Regular maintenance put in place on all mobile plant. SUEZ's mobile plant contract allows for provision of new plant in the event of failure	Medium

Hazard	What may be impacted	Type of impact	Probability of exposure	Consequence	Magnitude of risk	Justification for magnitude	Risk Management	What is the overall risk?
	control infrastructure)	suppression system				contract with a third-party supplier		
Loss of fuels, chemicals or spare parts	Site operations, site infrastructure	Loss of fuel for mobile plant, lack of spare parts for cranes and compactors	Low	Medium	Medium	The site requires red diesel for mobile plant operations and limited supplies of spare parts / tools	Fuel is procured by SUEZ through multiple contracts, and is protected over other industries due to the operation being key Spare parts and tools are obtained via SUEZ's contract with plant provision and maintenance suppliers	Low
Loss of IT	Site operations	Loss of IT	Low	Low	Low	IT systems are used for supporting site operations The site operation itself is a manual/physical process, so IT is not critical to ongoing operations	Deliveries and offtakes can be arranged by phone if needed IT systems are used in plant telematics, but are not critical to plant operation	Low
Electrical/Grid failure	Site operations, site infrastructure	Loss of power to lighting systems	Low	Low	Low	I.T. and lighting systems are used for supporting site operations The site operation itself is primarily a manual/physical process, so I.T. is not critical to ongoing operations	In the event of full power loss for a prolonged period, generators and lighting towers can be hired to allow the operation to continue Deliveries and offtakes can be arranged by phone In the event of full power loss for a prolonged period, if necessary, waste can be diverted to an alternative SUEZ Cornwall facility	Low

4 CONTINGENCY ARRANGEMENTS

4.1.1 Each incident is unique, and as a result the corresponding contingency arrangement will need to be unique to that situation. However, there are several contingency arrangements that SUEZ can plan in advance. These are as follows:

- Should the facility in question be compromised, the alternative tipping site is:

Facility	Address and Permit Reference
Truro HWRC	Tregurra Park, Newquay Road, Truro, Cornwall, TR1 1RH EPR/GB3201LP
Bodmin HWRC	Wheal Prosper, Lanivet, Bodmin, Cornwall, PL30 5ET. EPR/HP3296HD
St. Austell HWRC	Menear Road, St.Austell, Cornwall, PL25 3DG. EPR/FP3096HN
Dudnance Lane HWRC	Dudnance Lane, Pool, Redruth, Cornwall. TR15 3QT EPR/HP3596HS

- In the unlikely event the above sites are not available, SUEZ will liaise with the Council to agree use of other sites on a temporary basis.
- Use of replacement staff to provide cover to the site in the event of injury, disease or death affecting the workforce at the facility. Cover staff will be provided primarily from the SUEZ Cornwall network, but can also be sourced from the wider South West region if required.

5 RECOVERY OF SERVICE

5.1.1 It is important that if an incident occurs, service is recovered to the required level as quickly as possible. This is important for SUEZ, customers, and any partners (such as Local Authorities). The timescale for full recovery of service will depend on the severity of the incident. If site operations are completely stopped for over 24 hours, then a bespoke service recovery plan will be developed and communicated to ensure full service is recovered as quickly as possible, and required actions are communicated to all invested parties.

The following stakeholders should be consulted and informed of recovery of service plans:

- Cornwall Council.
- SUEZ's commercial team.
- SUEZ's health and safety team.
- SUEZ's environment and industrial risk team.
- Regulators (EA, HSE).
- Customers (both input and offtake).

6 ROLES AND RESPONSIBILITIES

6.1.1 Basic roles and responsibilities for management of incidents at a regional level are as follows:

Incident Role	Normal Role	Responsibilities
Local Incident Controller	Operations Manager or Site Manager	• Notify relevant parties (including emergency services if needed) • Identify and set up incident control location (generally the office) • Liaise with the emergency services if and when they arrive on site • Manage the incident at a local (site) level
Deputy Local Incident Controller	Site Manager or Site Supervisor	• Deputise for the Incident Controller at a local (site level) • Support the Incident Controller
Regulator Liaison Controller	EIR Manager H&S Manager Operations Manager	• Communicate and liaise with relevant regulators. • EIR Manager to communicate with EA • H&S Manager to communicate with HSE • Operations Manager to communicate with Fire Service
Regional Incident Controller	Contract Manager / Regional Manager (Operations)	• Co-ordinate regional operational response to the incident • Communicate with key stakeholders (including Contract partners and Local Authorities if required) • Communicate with key SUEZ stakeholders (communications team, Regional Director) • Arrange for relief staff if required • Arrange for replacement plant if required • Arrange for repairs or substitute equipment
Regional Incident Controller	Contract Manager / Regional Manager (Commercial)	• Co-ordinate regional commercial and material flow response to the incident • Arrange for emergency haulage • Communicate details of the situation and alternative tipping sites to customers

6.1.2 In the event of a serious incident (defined as follows) then the roles and responsibilities as identified in IMS – Emergency Preparedness and Response will also be adopted.

- An accident resulting in life changing injuries to a SUEZ employee or third party.
- A serious fire or explosion resulting in injury or significant business disruption.
- Any event that has led to or created the potential or actual risk of environmental and reputation harm arising out of SUEZ operations and or sites and which may give rise to an investigation by regulatory authorities.
- Any event resulting or likely to result in enforcement activity from a Regulatory Body such as the Health & Safety Executive or Environment Agency.

Appendix A – Probability and Consequence Assessment Definitions

Hazard: A property or situation that in particular circumstances could lead to harm.

Probability: Probability of exposure is the likelihood of the receptors being exposed to the hazard

Probability	Definition
High (H)	High – exposure is probable: direct exposure likely with no / few barriers between hazard source and receptor.
Medium (M)	Medium – exposure is fairly probable: feasible exposure possible - barriers to exposure less controllable.
Low (L)	Low – exposure is unlikely: several barriers exist between hazards source and receptors to mitigate against exposure.
Very Low (VL)	Very Low – exposure is very unlikely: effective, multiple barriers in place to mitigate against exposure.

Consequence: The adverse effects or impacts of a hazard being realised upon a receptor:

Consequence	Definition
High (H)	Possible irreparable damage to environmental resources
Medium (M)	Possible damage to environmental resources which are limited within a regional context
Low (L)	Possible effects might be transient damage to environmental resources which are commonplace on a regional basis and alternative resources are readily available
Very Low (VL)	The effects are negligible or might cause very slight temporary deterioration in the current environmental resource quality.

Risk Estimation Matrix

Risk: A combination of the probability, or frequency, of occurrence of a defined accident and the consequence and magnitude of impact. The general High (H), Medium (M), Low (L) and Very Low (VL) ratings listed in the Table below, are for use as a guide only based on:

Table - Risk Estimation Matrix

Matrix for the Estimation of the Risk				
	Consequence			
Probability of the Risk	High	Medium	Low	Very Low
High	High	High	Medium	Low
Medium	High	Medium	Medium	Low
Low	Medium	Medium	Low	Low
Very Low	Low	Low	Low	Low