

BRADFORD WATTS

WASTE MANAGEMENT POLICY

Policy Statement:

Bradford Watts Ltd acknowledges its duty of care under environmental legislation to manage all waste generated by its operations in a safe, efficient, and sustainable manner. We recognise that construction and demolition activities generate significant volumes of waste, and we are committed to implementing robust waste management systems that minimise environmental impact, conserve natural resources, and ensure full compliance with applicable law.

Our approach is guided by the principles of the Waste Hierarchy:

- Prevention – Avoid creating waste wherever possible.
- Preparation for Re-use – Recover materials for direct reuse.
- Recycling – Convert waste into new materials.
- Other Recovery – Recover energy from waste that cannot be recycled.
- Disposal – Use landfill only as a last resort.

We will ensure that waste management is embedded into the planning, design, procurement, and delivery stages of all projects.

Objectives:

- Legal Compliance – To comply with the Environmental Protection Act 1990, Duty of Care Regulations, and all other relevant UK and EU legislation.
- Minimisation of Waste – To reduce construction and office waste through efficient use of materials, careful ordering, and re-use strategies.
- Recycling Targets – To achieve a minimum recycling/recovery rate of 90% for non-hazardous construction waste and 100% compliant disposal for hazardous waste.
- Supply Chain Engagement – To work with suppliers and subcontractors to source sustainable materials and minimise packaging waste.
- Transparency – To record, monitor, and report on waste management performance, providing evidence to clients where required.
- Training and Awareness – To provide training for staff and subcontractors to ensure correct segregation, handling, and disposal of waste streams.

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Legal and Regulatory Framework:

Bradford Watts Ltd complies with the following legislation, standards, and guidance:

- Environmental Protection Act 1990 (EPA 1990) – Section 34, Duty of Care for Waste.
- Waste (England and Wales) Regulations 2011 (as amended) – Incorporates the Waste Hierarchy.
- Controlled Waste (England and Wales) Regulations 2012 – Classification of waste streams.
- Hazardous Waste Regulations 2005 (as amended) – Handling, storage, and documentation of hazardous waste.
- The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 – Management of electronic and IT waste.
- The Landfill (England and Wales) Regulations 2002 – Restrictions on landfill disposal.
- Construction (Design and Management) Regulations 2015 (CDM 2015) – Duty to manage health, safety, and environmental risks, including waste.
- Environmental Permitting (England and Wales) Regulations 2016 – Ensuring waste carriers and disposal sites are licensed.

In addition, we will comply with Environment Agency guidance, local authority regulations, and client-specific requirements.

Scope of Policy:

This policy applies to all activities carried out by Bradford Watts Ltd, including:

- Construction, roofing, demolition, M&E, decorations and refurbishment works.
- Office administration and support functions.
- Transport, storage, and handling of waste.
- All employees, agency staff, subcontractors, consultants, and visitors.

Waste Streams Managed:

- Construction Waste: Concrete, bricks, timber, insulation, plasterboard, metals, tiles, asphalt, roofing materials.
- Packaging Waste: Cardboard, plastics, pallets, protective wrappings.
- Hazardous Waste: Adhesives, solvents, asbestos, oils, paints, sealants, contaminated PPE, lead flashing, mastic tubes.
- Office Waste: Paper, toner cartridges, IT equipment, general mixed waste.
- Specialist Waste: Electrical equipment (WEEE), batteries, fluorescent tubes.

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Waste Management Procedures:

Waste Prevention and Minimisation:

- Design Stage: Encourage design solutions that minimise material use and maximise modular/prefabricated elements.
- Procurement: Purchase materials in accurate quantities to avoid surplus; preference given to suppliers offering take-back schemes or recycled materials.
- Packaging: Work with suppliers to reduce single-use packaging; utilise reusable pallet systems where possible.
- Digital Systems: Reduce office waste through paperless working, electronic records, and digital communication.

Waste Segregation on Site:

- Provide colour-coded and clearly labelled skips/containers for different waste streams.
- Segregate into: Inert (concrete, bricks, rubble), Timber, Metals, Plasterboard (must be separated), Packaging, Hazardous Waste, General Waste.
- Ensure subcontractors follow segregation rules, with toolbox talks delivered regularly.

Hazardous Waste Management:

- Identify hazardous waste at project planning stage (e.g., asbestos, adhesives, solvent-based products).
- Store hazardous waste in designated, secure, bunded areas.
- Maintain Hazardous Waste Consignment Notes for each transfer.
- Ensure licensed hazardous waste contractors are used at all times.

Waste Handling, Storage and Transportation:

- Waste stored in designated areas only, away from drains and watercourses.
- Skips to be covered where risk of windblown litter or rain ingress exists.
- All waste carriers must hold a valid Waste Carrier's Licence.
- Disposal facilities must hold an Environmental Permit.

Waste Transfer and Documentation:

- Complete Waste Transfer Notes (WTN) for all non-hazardous waste movements.
- Complete Hazardous Waste Consignment Notes for all hazardous waste movements.
- Retain documentation for statutory periods: 2 years (non-hazardous), 3 years (hazardous).
- Keep records available for inspection by the Environment Agency, Local Authority, or clients.

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Disposal:

- Recycling and Recovery First: All suitable waste streams to be sent to licensed recycling/recovery facilities.
- Landfill Last Resort: Only used when recovery/recycling is not technically or economically feasible.
- Disposal routes will be checked to ensure final destinations are compliant and licensed.

Roles and Responsibilities:

Directors:

- Approve and endorse the Waste Management Policy.
- Ensure adequate resources are allocated for waste management.
- Review performance annually.

Site Managers / Supervisors:

- Implement waste management procedures on site.
- Arrange for waste segregation, storage, and collection.
- Ensure compliance with Duty of Care and documentation requirements.
- Report waste volumes and recycling performance to Head Office.
- Environmental Manager (if appointed)
- Monitor compliance across all sites.
- Conduct site waste audits.
- Review waste management data and identify opportunities for improvement.

Employees and Subcontractors:

- Segregate waste correctly into designated containers.
- Handle hazardous waste in line with training and site rules.
- Report non-compliance, spills, or issues to supervisors immediately.

Training and Awareness:

- Induction Training: All staff and subcontractors will be briefed on site waste arrangements at induction.
- Toolbox Talks: Regular talks on correct segregation, hazardous waste handling, and waste reduction.
- Office Staff Training: Guidance on recycling schemes, digital working, and energy/waste efficiency.

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Subcontractor Engagement: Contracts include obligations for waste management compliance.

Monitoring and Performance Measurement:

Site Managers to maintain Site Waste Management Logs recording type, quantity, and destination of all waste.

Key Performance Indicators (KPIs):

- % of waste diverted from landfill.
- Tonnes of waste generated per £100k project value.
- Tonnes of recycled/reused materials.
- Monthly reporting to Directors on performance against recycling/reduction targets.
- Annual environmental review and update of policy.

Communication:

- Policy displayed on all site notice boards and company offices.
- Communicated to all employees, subcontractors, and suppliers.
- Available to clients, regulators, and members of the public upon request.

Continuous Improvement:

Bradford Watts Ltd is committed to continuous improvement by:

- Increasing waste diversion rates year on year.
- Identifying and trialling innovative recycling and material recovery technologies.
- Working with clients to set and achieve project-specific waste targets.
- Reviewing supply chains to favour sustainable and recycled materials.

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