



WASTE MANAGEMENT POLICY

Summary

This waste management policy promotes processes and working practices that minimise the environmental impact Redrow developments have on the natural environment whilst simultaneously embracing sustainable and economically viable construction methods.

For the policy to succeed it is essential that there is full commitment and effort from all Redrow employees, subcontractors and suppliers. For this reason, the Redrow Board have given their full endorsement to this waste management policy.

On our developments clear benefits to be gained from the policy will be evident via cleaner and tidier sites, which in turn create positive Health and Safety benefits and provides an environment conducive to efficient productivity. Measurable outcomes of the policy will be reduced waste costs and an overall improvement in understanding costs.

This document outlines methods and procedures regarding waste minimisation and how waste is to be removed from site. Specifically, consideration is given to current legislation and what influence this has on the way Redrow process waste. Because it is recognized that waste removal has Health and Safety implications, the policy details how waste is to be handled and removed from site. In terms of environmental considerations, significant thought and effort from a strategic and practical level has been invested in waste minimisation, and recycling and reuse of materials.

The key components of the policy are expanded in greater detail within this document but briefly comprise:

- 1. adoption of a waste segregation policy involving four waste streams;***
- 2. special arrangements for limited space or end of site situations;***
- 3. Redrow subsidiary company negotiation with local waste handling companies; and***
- 4. keeping of detailed generated waste information, site by site, with monthly reporting in Redrow subsidiary company board reports.***

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1 INTRODUCTION

Redrow prides itself at being at the forefront of innovation in UK private sector house building and commercial developments, and fulfilling its obligations to shareholders to ensure that it uses the four *M*'s (*men¹, money, machines and materials*) as effectively and efficiently as possible. The need to embrace this waste management policy is therefore clear.

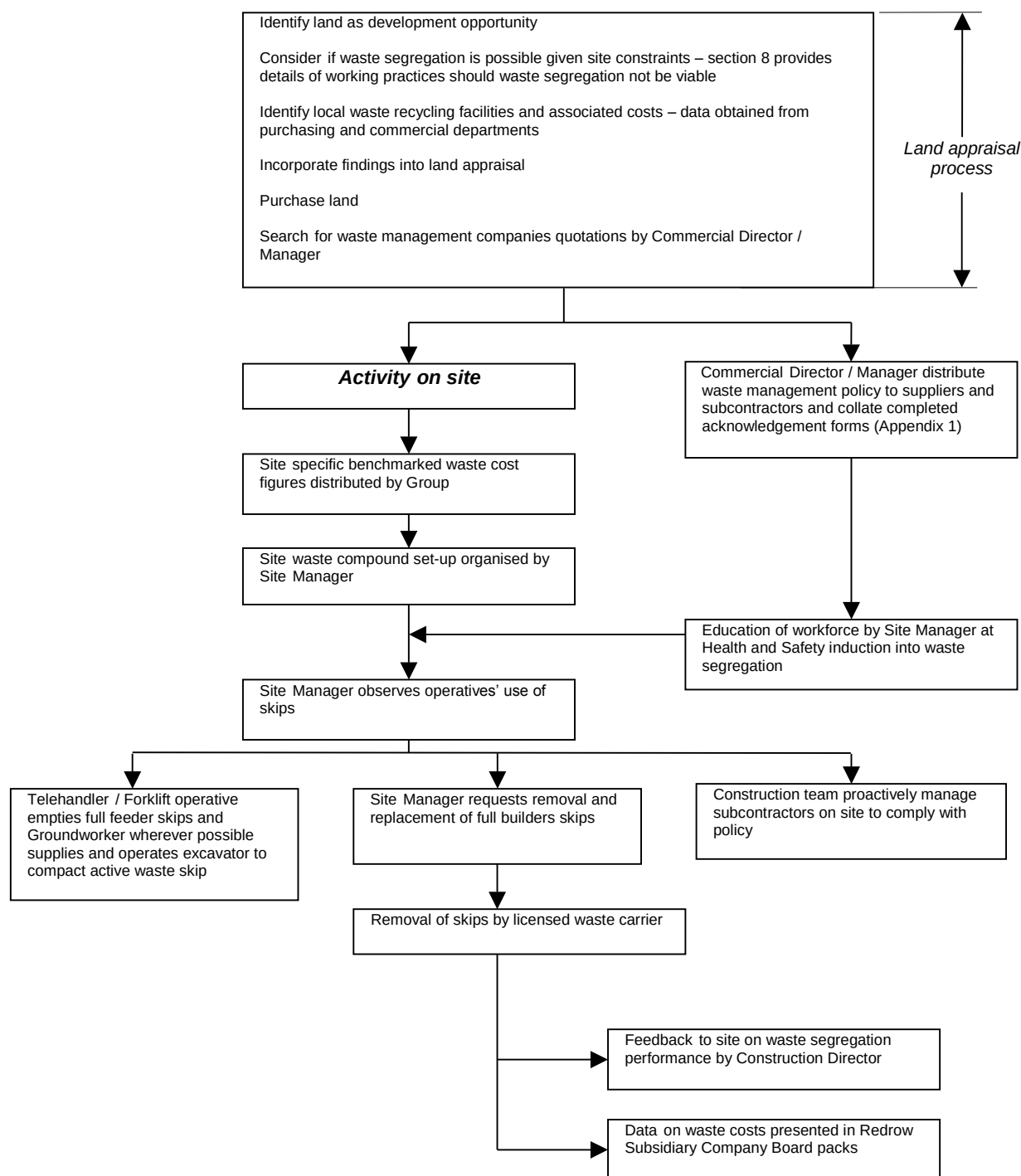
This document is divided into four dominant sections.

1. Section one outlines the background, legislative requirements, and the aims and objectives of this waste management policy.
2. Section two considers waste minimisation in all its aspects.
3. Section three details management aspects.
4. Section four details site waste removal procedures.

Figure 1 details this document in diagrammatic format.

¹ The male pronoun is used throughout this document as an aphorism only. Redrow fully support and embrace women entering and working in the construction industry.

Figure 1: Redrow's waste management policy



1.1 Aims and objectives of Redrow's waste management policy

The aim of this policy is:

'to reduce the amount of resources being unnecessarily consumed in the construction and development of Redrow properties'

In achieving this aim the following objectives will be met:

- ***to promote sustainable housing developments;***
- ***seek to minimise the impact of Redrow developments on the natural environment;***
- ***seek to minimise traffic generated as a result of having to remove waste materials;***
- ***to adopt best practice waste management habits;***
- ***to optimise the recovery of finite resources (including energy) from waste;***
- ***to promote an ethos of recycling waste materials;***
- ***to mitigate against the influences of greenhouse gases;***
- ***seek to minimise house building costs;***
- ***to optimise timing and manner of deliveries;***
- ***to liaise with manufacturers to minimise the impact of packaging; and***
- ***ensure efficient storage of materials on site.***

In terms of financial and environmental implications, this waste management policy provides Redrow subsidiary companies with guidance on how to improve their efficiency across both of these measures.

1.2 Health and Safety issues

Under the Duty of Care provisions in the Environmental Act 1990 each person producing waste is responsible for safe handling and lawful disposal of waste. In achieving this Duty of Care, individuals are responsible for:

- ***preventing unauthorised unlicensed disposal of waste (i.e. fly tipping);***
- ***preventing waste products escaping from a safe storage vessel and contaminating the environment;***
- ***ensuring that waste does not form any hazard or damage to third parties or their property;***
- ***ensuring that waste is removed in the correct manner by a correctly licensed waste carrier;***
- ***providing suitable descriptions of waste so that a waste disposal agency can deal with it in a suitable manner; and***
- ***retaining a record of all waste transfers for a period of two years.***

Failure to comply with these criteria can result in an unlimited fine.

It is therefore critical that this document is read, understood and embraced by all employees, subcontractors and suppliers who have a direct influence on activities that are conducted on site.

1.3 Current legislation impacting on waste management

The following acts and statutory instruments have been consulted in the construction of this document:

- Environment Protection Act (1990) Act of Parliament.
- Waste Management Licensing Regulations (1994), Statutory Instrument 1994 / 1056.
- Construction (Design and Management) Regulations (1994).
- Environment Act (1995).
- Controlled Waste Regulations (1992).
- The Landfill Tax Regulations (1996).
- The Landfill Tax (Amendment) Regulations (2002).
- Producer Responsibility Obligations (Packaging Waste) Regulations (1997).
- Producer Responsibility Obligations (Packaging Waste) (Amendment) (England) Regulations (2002).
- Control of Substances Hazardous to Health Regulations (2002).

All of the above documents can be viewed at St David's but are summarised in Appendix 2.

2 GOVERNMENTAL INFLUENCES UPON WASTE

Taxation legislation has a direct influence on waste management and has acted as a significant coercive force for the implementation of this waste management policy. At present (June 2012) statute can be broadly described as:

Government landfill taxation – the Government levy a tax on waste that is sent to landfill. The level of taxation will increase to coerce industry to reduce the amount of waste it produces and sends to landfill.

Government transport taxation – in a similar manner to landfill tax, costs associated with transport have increased due to taxation (e.g. road fund tax, fuel tax etc.). The Government has failed to provide prescriptive guidance on future tax increases that will be imposed on transportation.

Aggregate tax – the aggregate tax came into effect on 1 April 2002 and is currently charged per tonne for sand, gravel and crushed rock. If these materials are sourced from recycled sources then the tax on such is foregone.

The landfill directive – in order to actively reduce the amount of waste sent to landfill the Landfill (England and Wales) Regulation 2002 states that pretreatment of waste is required

before it is accepted at a landfill site; landfill sites will be classified into one of three categories: hazardous, non-hazardous, or inert according to the type of waste they can receive, and biodegradable waste will be diverted away from landfill. The crux of this means that waste disposal will become more difficult and more expensive.

There is therefore a need to manage waste and ensure the most cost effective waste removal processing practice is undertaken in order to maintain the competitiveness of Redrow's cost base.

3 MINIMISING WASTE ON SITE

European Union construction sites produce in excess of 180 million tonnes of construction and demolition waste per annum. Because many of these resources are obtained from finite sources, it is obvious that the industry, as a large consumer of materials, has the potential to play a major part in ensuring the longevity of the natural environment. Economic reasoning also dictates that material usage on site should be optimised to increase efficiency.

Research has identified that between five and ten per cent of materials (both manufactured and processed goods) supplied to site are wasted and / or damaged before they are fixed. There is a cost to this both in terms of storing materials that will be damaged and in the loss of revenue due both to replacing the damaged material and removing the waste material from site. Because of the potential negative impact of failing to embrace a suitable waste management policy, the Board at Redrow are fully committed to maintain their awareness of materials usage; understand advances in waste management; and build on this knowledge to enhance the company's performance. Employees, subcontractors and suppliers of Redrow are expected to support the Board in their quest for more efficient materials usage.

Practical issues for site management include ensuring appropriate storage of materials; bricks and blocks should be palletised wherever possible and timber products be kept in accordance with the suppliers / manufactures recommendations.

It is the responsibility of all subcontractors to act in a responsible manner with regards to the amount of waste they produce and for Redrow Construction teams to proactively manage subcontractors to comply with the policy.

Whenever materials are ordered they must be in accordance with the schedules prepared by Group. Ordering of additional materials other than those detailed in the schedules for house construction requires appropriate authorisation in accordance with Policy and Procedures.

3.1 Materials handling and storage

To ensure that materials remain undamaged in storage the following handling and storage procedures must be undertaken:

- ***store materials in the appropriate dedicated area;***
- ***materials stores should be secure;***

- *position store away from vehicular access routes and movements;*
- *check goods on delivery and return any damaged goods supplied to site to the respective supplier at their cost;*
- *store materials in their original packaging until they are to be installed;*
- *store materials in accordance with the manufacturers' instructions;*
- *do not store unnecessarily large amounts of materials unless in accordance with Group instructions (e.g. bricks and blocks – retain three months' supply); and*
- *aim to reduce the amount of time any materials are in storage.*

Ideally, materials should be supplied on pallets to facilitate easy mechanical handling. Pallets should be collected by the respective suppliers in a timely manner at the request of Redrow. Where suppliers are not prepared to collect their pallets, these pallets should be sold on to pallet reclamation companies.

Under no circumstances should pallets be deposited in skips.

When transporting materials from the site store they must be protected from being damaged. Such protection may take the form of positioning materials on pallets so that they do not sit directly on the ground; covering materials with a waterproof cover; keeping materials in a store that is dry and well ventilated; and ensuring that manufacture's storing, handling and transportation recommendations are followed. Failure to observe these points could result in materials being damaged and excess waste being produced.

3.2 Waste management definitions

The following definitions are used throughout the document and have the following meanings:

- (a) *Packaging waste*: typically consisting of paper, card, polythene, polystyrene, and plastic corner protection devices etc.
- (b) *Active compactable waste (non-inert)*: attracting top rate of landfill tax and typically comprising of metal banding, empty paint containers, canteen waste and any other compactable material.
- (c) *Active non-compactable waste*: typically comprising of oversized off-cuts of plastic, timber, and metals.
- (d) *Non compactable non-active waste (inert material)*: attracting low rate of landfill tax, non-contaminative material which can be recycled at source examples of which being brick, block and concrete.
- (e) *Feeder skips*: typically having a 2yd³ capacity and being strategically situated across the site to have segregated waste deposited in them (see section 4 regarding materials segregation). Feeder skips are to be in good condition, be regularly inspected and comply with Redrow's Health and Safety policy. Skips that do not comply with this criterion must not be used. Care should be employed when loading a feeder skip into a builders or roll on roll off skip to eliminate potential health hazards.

(f) *Builders skips*: typically having a capacity of 8 or 12yd³ and situated in a secure compound for non-compactable inert waste (d), for active non compactable waste (c), or for timber waste.

On sites where uncommon waste materials are being handled, a risk assessment of the waste should be conducted by the Contracts Manager and approved by the Health & Safety department. Any specialist waste removal practices should be undertaken by a specialist waste management company who is fully licensed to carry out such a task.

3.3 **Benchmarking site waste**

To ensure that sites are complying with this waste management policy, a site self-auditing process should be undertaken. This auditing process should continually seek improvement on the following aspects:

- *the quantity and quality of materials contained in the skips (quality in this sense is defined as materials being suitable for use on another part of the build process);*
- *the general condition materials are stored on site prior to their usage;*
- *the quantity of waste and off-cut materials deposited around the site; and*
- *the ability of site personnel to segregate waste into appropriate types.*

Indirectly, results of this auditing process will be made explicit via costs of waste removal from site. In turn, this cost data will be reported in Subsidiary Company Board Reports.

3.4 **Roles and responsibilities**

The ability of this waste management policy to operate to its maximum effectiveness is reliant upon the people and resources supplied to it. Therefore, the following individuals are made explicitly responsible for the following tasks:

Table 1 - Waste responsibilities

Individual	Tasks
All site operatives / subcontractors	• segregating waste and inserting into appropriate skips
Site labourer / telehandler / forklift driver	• ensuring that skips are located in positions as directed by the Site Manager; and • that skips are emptied at appropriate frequencies.

Site Manager	- informing the site labourer / forklift / telehandler driver where skips should be located; - monitoring all site operatives' waste materials skipping habits; - inducing new site operatives into the waste management policy; and - proactive management of subcontractors on site to comply with Redrow policy.
Contracts Manager	- monitor the type and quantity of materials being removed from site; - highlight to Construction Director any contractors who have been excessively skipping materials; and - proactive management of subcontractors on site to comply with Redrow policy.
Construction Director	- monitoring the quantity of materials being removed from site; - ensuring that the waste management policy is being upheld; and - proactive management of subcontractors on site to comply with Redrow policy.
Commercial Director / Manager	- obtain the most economical waste removal company; - collate suppliers and subcontractors agreement forms (see appendix 1); - inform potential contractors and suppliers of their waste handling responsibilities should they be awarded the contract; - distribute waste management policies to prospective subcontractors and suppliers; and - proactive management of subcontractors on site to comply with Redrow policy.
Land Department	incorporate waste removal costings in land appraisal.

3.5 Recycling and reuse of materials

It is inevitable that the construction process will demand the cutting and shaping of materials in order for them to fit. Because of this 'natural' wastage, off cuts should always be considered for reuse prior to making the decision to skip them.

To optimise the use of materials on site and minimise waste the following factors should be considered and embraced:

- programme delivery of materials so that they are not left stored on site for considerable lengths of time which exposes them to possible damage and theft;*
- order materials in accordance with the schedule details on the DCC (Direct Cost Control System) which represents the appropriate quantity required*
- taking care at delivery and offloading;*
- ensure safe and secure storage areas with suitable arrangements appropriate for each material;*
- ensure delivery to correct location to avoid double handling;*
- check correct materials have been delivered undamaged before signing off delivery sheets;*
- retain packaging on materials as long as possible to prevent damage occurring; and*
- encourage all personnel on site to keep their areas clean and tidy.*

4 WASTE SEGREGATION

***Waste materials shall be segregated into timber;
bricks and blocks; plasterboard; and 'other' waste streams.***

Table 2 details how materials should be evaluated in terms of their usefulness. Where materials fall under the 'reuse' banner they should be placed in the appropriate skip / storage facility to facilitate their reuse. A storage facility is defined as an area of site not under construction and where safe storage of recyclable materials is possible.

Reprocessing of materials should be conducted off site unless on site facilities are available.

If there is the potential to cost effectively reprocess any other materials then this should be embraced, subject to Health and Safety considerations.

Where materials have the potential to be reprocessed, details of companies offering a reprocessing / recycling service can be found at: www.ciria.org/recycling or www.smartwaste.co.uk

Material	Reuse criteria	Potential to reprocess	Reprocessed material usage
Concrete	If under one hour old after delivery to site or of a suitable consistency to carry out the task required of it	✓	Crushed material used as hard standing
Brick	If brick is whole and clean	✓	Crushed material used as hard standing
Block	If block is whole and clean	✓	Crushed material used as hard standing
Mortar	Dependent upon type of mortar used	✓	Crushed material used as hard standing
Timber	If length is greater than 600mm	✓	Sent to timber recycling plant
Roofing tiles	If undamaged	✓	Crushed material used as hard standing
Ceramics and ceramic tiles*	If undamaged	X	
Plastics	If length is greater than 600mm	X	
Metal	If length is greater than 100mm	X	
Packaging – card and paper	None	X	
Packaging – plastics	None	X	
Insulation	Collection by manufacturer	X	
Packaging metal banding	None	X	
Packaging pallets	Collection by supplier or by ELM	X	

* due to there being a possibility of ceramic materials containing sharp edges after being crushed, ceramics should not be reprocessed

5 PLASTERBOARD

Full use of the British Gypsum recycling system shall be made by plasterboarding contractors for their plasterboard waste removal. Redrow will provide contractors with an allowance of two one-tonne bags per dwelling for the removal of plasterboard off cuts; should the plasterboarder produce more waste than can be

contained within these bags then they shall be financially responsible for the costs of the additional plasterboard off cut bag removals. The plasterboarding contractor is not allowed to provide his own skip for waste removal.

No other material than British Gypsum plasterboard must be deposited in the bags provided. British Gypsum is the solus supplier of plasterboard to Redrow and consequently there should not be any plasterboard waste which is non-British Gypsum.

6 MANAGEMENT OF WASTE SEGREGATION

6.1 Subcontractors' and suppliers' knowledge of Redrow waste management policy

We are committed to minimising the environmental impact of our activities. As part of this commitment, we will work to reduce the amount of construction, demolition and excavation to landfill. We will adopt and implement standards for good practice in reducing waste, recycling more, and increasing the use of recycled and recovered materials.

To help deliver on this commitment we expect our supply chain partners to support us in this area, and to meet the minimum requirements set out below. All organisations appointed to work on our behalf are required to work in accordance with this requirements.

To ensure that subcontractors and suppliers are fully aware of Redrow's waste management policy, prior to signing any contracts the following process shall be followed:

For Suppliers

Discussions shall be undertaken by Commercial departments either at Group or subsidiary company level (as appropriate) to ensure that materials are where possible within agreeable costs and:

- *of a suitable size to minimise the need for on site cutting and shaping;*
- *suitably packaged to prevent them being damaged either in transit or storage;*
- *raw materials obtained from a certified sustainable source;*
- *timber products sourced from WWF approved forestry sources in accordance with the Redrow Procurement Policy document;*
- *packaged using biodegradable material or packaged using material that is sourced from a sustainable supply;*
- *that any packaging that does not comply with the above criteria is reusable; and*
- *that suppliers collect recyclable packaging subject to cost.*

For Subcontractors

At tender stage subcontractors will be provided with this document so that they are fully conversant with the demands that will be placed on them in terms of waste segregation and its associated costs.

To ensure that on site operatives are aware of their responsibilities, prior to being allowed on site, subcontractors will undergo an induction into the waste management policy. This induction should be registered in the site office records in a similar

manner to the Health and Safety induction they receive. Content of the induction will include details of:

- *positions of skips;*
- *the waste segregation policy employed; and*
- *where suitable materials storage facilities are positioned.*

To promote the waste management policy, posters will be positioned at appropriate locations so that when operatives' sign in they are reminded of the waste protocol (see Appendix 4 for poster details).

Suppliers and subcontractors must return the form in Appendix 1 to the Redrow subsidiary company Commercial departments stating that they agree to comply with this waste management policy.

All operatives going on site shall be inducted by Site Management into both Redrow Health and Safety rules and Redrow's waste management policy.

No other persons than those employed on site are allowed to use Redrow skips. In particular, Redrow customers are not allowed to use Redrow skips for the removal of their waste.

6.2 Reporting of performance

Full details of performance will be reported in subsidiary company board packs; this will emphasize the importance of efficient waste management and act as a stimulus to focus thought.

Waste costs should be reported at the Divisional Board meetings.

Divisions are encouraged to report examples of Best Practice to the Research and Sustainability department at St David's Park for dissemination around other Redrow Offices.

7 SEGREGATING WASTE

The key to successful reduction in waste costs is segregation.

Carrying out waste segregation offers the potential to recycle materials and encourages greater consideration of the need to dispose of those materials. As a result the overall tonnage of waste can be reduced.

Good site management of segregation is critical for success of the policy, therefore the following sections of the report outline management implications for different activities involving segregation.

7.1 Access to waste skips and general site layout

A segregation policy will be employed on all sites² (see section 4).

Resources provided by Redrow in order for segregation to take place will include:

- *waste chutes to facilitate waste segregation where appropriate;*
- *newly purchased feeder skips which must be able to be clearly labeled detailing the type of waste that can be deposited in them; or*
- *existing owned feeder skips which shall be clearly annotated with the type of waste to be deposited in them; and*
- *feeder skips will be located as close as possible to work areas to assist segregation.*

In terms of emptying skips the following procedure shall be undertaken:

- *feeder waste materials skips shall be emptied at regular intervals into builders skips suitably situated to facilitate their emptying by the appointed waste removal company; and*
- *builders skips shall be housed in a dedicated lockable fenced off area; the location of which should be as close as possible to the site office to facilitate easy monitoring of skip contents.*

Appropriate consideration should be given to accidental damage to skips which may occur as a result of vehicular impact or vandalism.

7.2 Management of partial segregation on site

Partial segregation is a viable solution to offer both cost savings and improving environmental issues.

Timber, brick and blocks, and plasterboard recyclable waste streams account for nearly three quarters of Redrow's waste. By limiting the number of waste streams to be segregated the management process to control skipping becomes feasible.

The philosophy of a partial segregation system is that it must be easy for site operatives to work and should not involve significant inconvenience for operatives to skip materials in the correct skip.

To give feedback to sites on their waste segregation success, benchmark figures will be set by Group and performance recorded by Site Managers. Similarly, to engender a level of competition between the sites in any one subsidiary company, each site's skipping costs will be made available in a graphical format that allows site operatives to determine what the impact of their skipping habits are in comparison to other sites. This site by site information will be collated and presented by Construction Directors.

8 RESTRICTED SITES AND END OF SITE IMPLICATIONS ON WASTE MANAGEMENT

Since different sites have varying characteristics in terms of the physical space available for a segregation compound it is unrealistic to demand segregation takes place under certain conditions.

The definition of a restricted site is: where there are less than five properties on the development left to construct or where housing three 8yd³ builders skips is unviable.

8.1 Waste segregation

Skips shall be clearly labeled. The labeling coordination of skips shall be as follows:

- green for timber off cuts (ideal maximum allowable length of timber off cut is 600mm);
- yellow inert waste i.e. bricks, block, mortar materials (clean bricks and blocks should be reused); and
- red for active general non-recyclable waste (ideal maximum lengths of any skipped materials should not exceed 600mm).

Appendix 4 contains signage to be used to indicate the type of waste to be placed into the respective feeder and 8 or 12yd³ builders skips.

It is the Site Manager's responsibility to ensure that this skipping regime is adhered to.

Plasterboard off cuts are to be removed from site in line with the criteria detailed in section 5 of this report.

It is the Site Manager's responsibility to ensure that all operatives on the site fully understand the waste policy.

8.2 Moving Waste on Site

Feeder skips shall only be moved using the correct machinery.

The definition of correct machinery is a machine that is designed with the specific purpose of lifting heavy objects; in the majority of cases a forklift / telehandler is deemed to be the most appropriate machine for this job.

When moving feeder skips, any contents that are physically hanging over the edge of the feeder skip shall be removed and initially considered for recycling; where recycling is not practical the material shall be cut to fit into the feeder skip by the operative whose waste it is.

By making operatives responsible for their own materials skipping, focus is explicitly placed on each individual to consider the implications of their working habits.

It is the site labourer / telehandler / forklift operative's responsibility to ensure that feeder skips are emptied at regular intervals.

8.3 Compaction of active waste

To optimise the tonnage of active waste in 8 and 12yd³ builders' skips, an excavator with banksman supervision (provided by the Groundworker) shall be used to compact the waste by placing the bucket onto the waste in the skip. The purpose of this exercise is not only to increase tonnage in skips but also to reduce the risk of materials being blown away both whilst the skip is on site and whilst in transit. It should be noted that this practice is only acceptable when a segregation policy is working effectively.

8.4 Waste removal

Waste removal from sites shall only be carried out between the hours of 8:00 am and 5:00 pm Monday to Friday and 8:00 am to 12:00 pm on Saturday and is subject to complying with planning and local environmental health constraints. Only in exceptional circumstances will waste be allowed to be collected at any other time.

BURNING WASTE MATERIALS IS STRICTLY PROHIBITED UNDER REDROW POLICY AND CAN LEAD TO SEVERE PENALTIES BEING IMPOSED BY THE ENVIRONMENT AGENCY.

The waste removal organisation will be responsible for supplying monthly reports to Redrow subsidiary company office detailing the volume, weight and type of waste products being removed from each site and their respective removal costings.

Where housing developments are being constructed in noise sensitive areas, the waste management company shall take full responsibility for ensuring acceptable noise levels are not exceeded when replacing builders skips.

When handling 'dusty' materials it is the waste management company's responsibility to ensure that any dust entering the atmosphere is minimised and within allowable tolerances. If there is any possibility that waste may be blown out of the feeder skip whilst it is in transit, then netting or other suitable sheeting should be used.

8.5 Waste removal authorisation

It is the waste management company's responsibility to safely transport waste materials from site to the respective waste management centre.

Waste management companies employed to transport waste from site along the public highway must have an up to date waste carriers licence and have completed waste transfer note(s) in their possession. This licence must be presented to the Commercial Director before the waste management company is asked to tender for a site's waste removal.

APPENDICES

Appendix 1 – Suppliers and Subcontractors agreement form

*Prior to being awarded any contract from Redrow this form must be returned to the respective
Redrow subsidiary company office*

Redrow Waste Management Policy

Please complete and return to the Redrow subsidiary office you are working for

I / We acknowledge receipt of Redrow's Waste Management Policy.

I / We have read and understood this document's contents, agree to observe these rules whilst working on your sites and communicate the document's requirements to all suppliers, subcontractors and employees.

I / We understand the need for managing our waste effectively and are willing to abide by this waste management policy.

Name

Signed

Date

Company.....

Appendix 2 – Summary of legislation influencing waste management

Environmental Protection Act (1990)

The Act is concerned with:

- the control of pollution arising from industrial processes;
- describing the criteria against which regulatory and other authorities must comply with for the collection and disposal of waste;
- provides an extension to the Clean Air Act;
- details the control mechanisms for the control of the importation, exportation, use, supply or storage of prescribed substances and articles of waste;
- details the law relating to the control of hazardous substances on land;
- to make provision for persons not complying with the Act and to enforce the courts to administer a maximum fine of £20,000; two years imprisonment' or both should any section of the Act be broken.

Waste Management Licensing Regulations (1994)

Waste disposal and recovery operations are subject to a range of permits in the UK depending upon the type and size of operation. The Waste Management Licensing Regulations ensure that permits implement the appropriate objectives of the directive. The crux of the regulation is that all waste carriers must be licensed to ensure that they receive and dispose of waste without endangering human health or the environment. For the purposes of removal of waste from Redrow's sites this legislation means that all operations that are employed to remove skips should be holders of the appropriate waste management licences.

Construction (Design and Management) Regulations (1994)

These regulations take a holistic view into the construction, design and management of a building. Because materials usage is a fundamental there is a link back to waste management. The Regulations have an impact on all stages of the planning and management of health and safety of a project. They place duties on clients, designers and construction organisations and introduce two new roles to the procurement process: the planning supervisor and the principal contractor.

The Regulations give the terms design and designer a wide definition and cover all designs and specifications to be used for the purposes of construction and all those involved in their preparation. Designers should pay adequate regard to health and safety risks when considering their designs.

Designs develop from initial concepts through to a detailed specification. At each stage designers from all disciplines have a contribution to make in avoiding and combating health and safety risks in construction. At various stages within the design process different mixes of design disciplines may be involved.

Readers are directed towards Redrow's Health, Safety and Environmental Standards for further information on the CDM regulations.

Environment Act (1995)

The act outlines the establishment of the corporate bodies to be known as the Environment Agency and Scottish Environment Protection Agency. These agencies, for the purposes of Redrow's business are concerned with:

1. contaminated land and abandonment of mines in all of there aspects such as: health and safety, harm to people and the environment, land remediation, and controlling risk of polluting water courses;
2. control of pollution in terms of its management, and risk assessment of pollutants;
3. conservation of natural resources;
4. land drainage and associated works must be undertaken to be sympathetic to the natural environment;
5. the Secretary of State's work into developing a national waste strategy which will actively promote reuse, recycling and recovery of products previously designated as waste;
6. enhancing the environment; and
7. imposing obligations onto certain persons in respect of certain products or materials.

Controlled Waste Regulations (1992)

This regulation provides a closely defined definition of what waste actually is and subsequently works closely with the Control of Pollution Act to minimise negative impacts on the natural environment. All aspects of construction work are covered by this legislation in terms of persons and organisations who must be competent and certified in accordance with waste removal from site.

The Landfill Tax Regulations (1996) and The Landfill Tax (Amendment) Regulations (2002)

These regulations are directed more towards landfill site operators than construction companies. Despite this, because construction activities produces significant amounts of waste it is necessary to understand how service providers (skip hire companies) have to work in order for them to comply with legislation. The main stance of the regulation is that inert waste attracts a significantly lower rate of tax per tonne than compared to active waste and that this differential is set to increase in order to have a coercive force for waste producers to segregate waste streams. In order to minimise the amount of tax paid waste producers must initially reduce the amount of waste produced, and secondly segregate waste streams into active and inert.

Producer Responsibility Obligations (Packaging Waste) Regulations (1997) and Producer Responsibility Obligations (Packaging Waste) (Amendment) (England) Regulations (2002)

This affects all companies who have a financial turnover greater than £2m per annum and who handle more than fifty tonnes of packaging per year. Whilst Redrow do not directly handle waste at the primary source it may be the case that suppliers to the Group have to recycle or reprocess materials they supply. The regulations require companies who do have turnovers greater than the amounts stated as having to submit data and information to substantiate that the minimum amount of overall packaging recovery and material specific recycling achieves the minimum standards set of them. It is likely that this regulation will be updated in the near future to bring it in line with European legislation that is in the process of being drafted.

Control of Substances Hazardous to Health Regulations (2002) - COSHH

The COSHH regulations relate to assessing risks associated with handling materials and substances that may cause potential damage / injury / harm to any person coming into contact with them. Because COSHH regulation fall directly under the remit of health and safety the reader is directed towards Redrow's Health, Safety & Environmental Standards.

Appendix3 – Poster situated at sign in book

WASTE MINIMISATION AND SEGREGATION

This site operates a waste minimisation and segregation policy. It is your responsibility to understand what this policy is and how you need to work in order to comply with it.

MATERIALS STORAGE

Materials must be stored in an appropriate place so that they are not damaged prior to them being fitted.

MATERIALS REUSE

Material off cuts should be considered for reuse prior to them being put into a skip.

SKIP MANAGEMENT

Waste materials shall be put into the appropriate skip; the skips are labeled as described below:

- **Green** for timber off cuts.
- **Yellow** for bricks, block, concrete and mortar materials – wherever possible clean bricks and blocks should be reused.
- **Red** for general non-recyclable waste.

DO'S AND DON'TS WITH WASTE MANAGEMENT

Do:

- use Group procurement;
- store materials properly;
- segregate waste streams;
- ask the telehandler driver for an empty skip if you need it;
- ask if you are confused about this waste policy

DON'T:

- burn waste;
- mix waste streams;
- think it's someone else's responsibility to place off cuts of materials in the appropriate skip

Plasterboard waste shall be removed in accordance with the respective subcontractor's contract. Two one-tonne dumpy bags will be provided by Redrow for each plot for the removal of British Gypsum plasterboard off cuts – no other material should be placed in these bags.

Appendix 4 – Skip signage protocol

Active Waste

Plastic Packaging, Paper & Card

Inert Waste

Bricks, Blocks, Roof Tiles

Timber