



Waste Management Policy

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1. EXECUTIVE SUMMARY

This policy is a necessary requirement to ensure Aircon Group fulfils its moral and legal duties for safe, compliant, environmentally, and financially sustainable Waste Management.

This policy provides guidance to all staff and defines responsibilities in all aspects of Waste Management with clear standards for appropriate waste segregation, storage, handling, transport, and disposal.

2. INTRODUCTION

Waste Management is the generic term given to the whole spectrum of activities associated with waste, namely, its generation, segregation, storage, handling and transportation from point of source (ward/department) to final place of disposal (recycling/landfill/incinerator).

This policy details Aircon Group arrangements, including responsibilities, for the classification, segregation, collection, storage, handling, transportation, and disposal of all waste produced as a result of Aircon Group activities.

3. SCOPE

This policy applies to all services directly provided by Aircon Group and all staff should familiarise themselves with the policy.

This policy encompasses the activities and responsibilities of all Aircon Group staff, including client's premises when applicable

This policy applies also to all sub-contractors who are engaged by Aircon Group undertake work on their behalf

4. AIMS AND OBJECTIVES

This policy has been prepared with the objectives of:

- Ensuring full legislative compliance for Waste Management activities at Aircon Group at all time, and when possible lead on best practice.
- Reducing and mitigating the Health & Safety, Fire Safety and Infection Control risks associated with Waste Management activities at Aircon Group.
- Reducing and mitigating the environmental impacts associated with Waste Management activities at Aircon Group.
- Ensuring robust controls and assurances are in place for all Waste Management activities at Aircon Group.

5. IMPACTS AND RISKS ASSOCIATED WITH WASTE MANAGEMENT

Health & Safety and Fire Safety

Aircon Group recognises the Health & Safety and Fire Safety risks associated with Waste Management.

Manual handling

The improper manual handling of waste presents a risk to Aircon Group staff and contractors. Aircon Group is committed to minimise and mitigate these risks as far as practically reasonable. This includes

the conduct of risk assessments when new waste management equipment or practices are introduced.

Falls and trips

The inappropriate storage of waste can create falls and trips hazards. Refer to the **STORAGE OF WASTE** section for appropriate waste storage protocols.

Fire safety

The inappropriate storage of waste can create fire hazards or impact fire evacuation procedures. Refer to the **STORAGE OF WASTE** section for appropriate waste storage protocols.

Infection Control

It is important to adopt appropriate handling and storage protocols which minimise the Infection Control risks associated with infectious waste. Refer to the **STORAGE OF WASTE** section for appropriate waste storage protocols.

Environmental impacts

Disposing of waste has very significant environmental impacts.

- Throwing away things is a waste of resources. It wastes the raw materials and energy used in making the items and contributes to global resources depletion.
- Landfilling waste generates methane gas, which is explosive and contributes significantly to Climate Change.
- Leachate produced as waste decomposes in landfill causes land or water pollution.
- Incinerating waste produces toxic substances, such as dioxins which have an effect on local air quality.
- Gases from incineration cause air pollution and contribute to acid rain, while the ash from incinerators may contain heavy metals and other toxins.
- Transporting waste is very carbon intensive, contributes to Climate Change and has an effect on air quality.

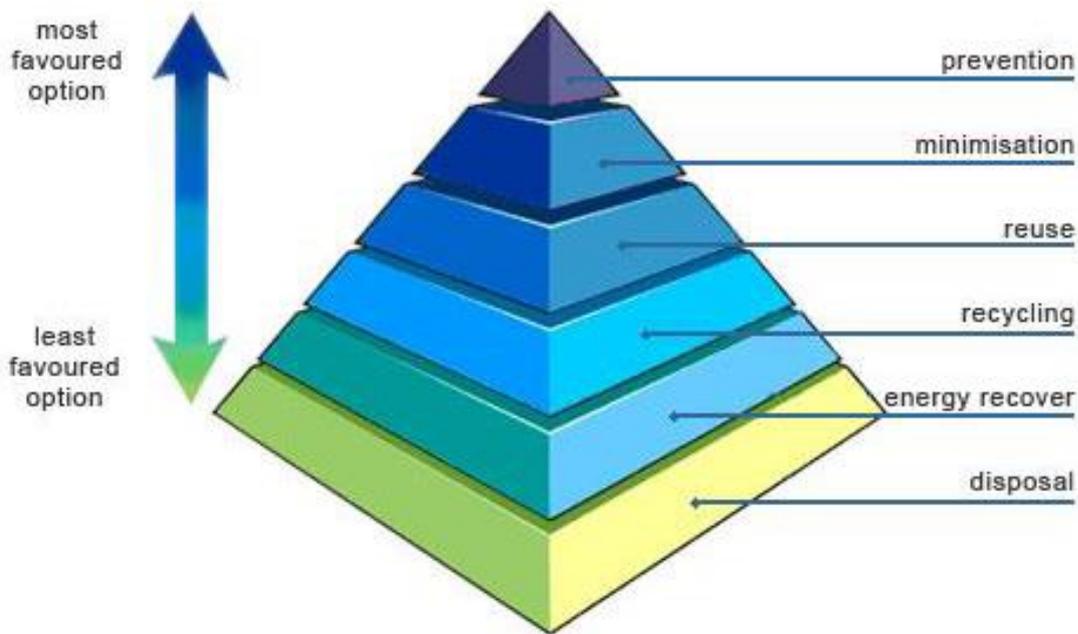
Environmental Policy statement

As stated in the Aircon Group *Environmental Management Policy*, it is the policy of Aircon Group to:

- Use the waste hierarchy at all time.
- Aim for “zero landfill”.
- Use local waste management treatment and disposal solutions when possible.
- Monitor, report and set targets on our management of domestic and commercial waste.
- Minimise the creation of waste.
- Ensuring we have robust systems for recycling wherever possible.

Waste Hierarchy

The waste hierarchy is a classification of preferred waste management options in order of their environmental impact.



“Zero-landfill”

Practice wherein wastes are reused; recycled or undergo alternative treatment processes with the aim of avoiding the use of landfills for disposal. This is particularly relevant for the residual fraction of domestic waste (General waste, i.e. black bags).

Different types of waste attract different disposal price rates and as a result good waste segregation generates substantial costs-savings.

6. KEY RESPONSIBILITIES

Managing Director

The Managing Director ultimately has overall responsibility for the safe, effective, and compliant Waste Management throughout Aircon Group.

All Staff

All Staff have a responsibility and legal duty of care to comply with this policy and associated procedures. All staff are responsible for:

- Observing the waste policy and waste management procedures. Most particularly in regard to correct waste segregation.
- Reporting accidents and any incidence of non-compliance with this policy.
- Considering any untapped opportunities for waste reduction, minimisation in recycling in their area/department.
- Actively participating and supporting waste reduction, minimisation and recycling initiatives undertaken in their area/department.
- Minimising waste production including:
 - Ensuring double sided printing (duplex) printing is enabled as the default setting for all printing (where local printers allow).
 - Reusing office stationery or wastepaper that has been printed on one side only as scrap paper when appropriate.

- Reviewing the need to purchase items so that future waste is avoided (i.e. not over-ordering items with a shelf life or where there is limited storage capacity).
- Considering purchasing options that minimise waste including leasing.
- Requesting that suppliers take unwanted items or packaging back where possible (e.g. pallets).

The Commercial Director of Estates

The Commercial Director of Estates has delegated responsibility for safe, effective and compliant Waste Management throughout Aircon Group. The Commercial Director is responsible for:

- To the Managing Director for establishing systems to this effect and ensuring sufficient resources are allocated.
- For delegating some of these responsibilities and duties to a nominated Estates officer with a Waste Manager responsibility.

The Waste Manager

The Waste Manager has a delegated responsibility for managing and monitoring systems for safe, effective and compliant Waste Management at Aircon Group. The Waste Manager is responsible:

- For providing advice and guidance on all matters related to Waste Management at Aircon Group.
- For the development, up-keeping and implementation of the Waste Management Policy and associated Procedures throughout the business.
- For ensuring waste legislative requirements are satisfied at all Aircon Group sites including applications for environmental permits or exemptions and registration with the Environment Agency as a Hazardous Waste Producer.
- For ensuring that all relevant new and upcoming waste legislative requirements are identified and when appropriate communicated to managers and staff, in a timely manner to ensure Aircon Group remains compliant at all times.
- For reporting breaches of regulatory compliance, the reason for non-compliance, and the measures taken to regain compliance and prevent further incidents.
- For acting as the principal point of contact with regulatory bodies and ensuring that all communications are maintained on file.
- For procuring waste management services contracts in a sustainable and legally compliant manner. For managing Aircon Groups' waste budget in a sustainable and cost-effective manner.
- For managing waste contractors employed by Aircon Group.
- For conducting a rolling schedule of waste audits throughout Aircon Group.
- For staff training and raising awareness on this policy and associated procedures.

Contacts, Service and Heating Department Managers

These managers have overall responsibility for the implementation of this policy within their Department, namely:

- Teams are aware of the right procedures and protocols for disposing of waste arising from service, maintenance and new install works.
- Ensuring that this policy and the procedures it contains, particularly regarding waste segregation are brought to the attention of and observed by all staff in the area under their responsibility. For non-clinical areas this includes segregating wastes for recycling and

ensuring that correct Aircon Group procedures are followed for any hazardous domestic waste (E.g. batteries, toners), electrical waste, bulky waste etc.

- Ensuring that there is a proactive approach to adhering to this policy and for staff under their management to be encouraged to participate in implementing this Waste Policy and associated procedures.
- Actively cooperating with the Waste Manager to ensure the effective and compliant management of waste arising in their area of responsibility
- Ensuring that this policy and the procedures it contains, particularly regarding waste segregation are brought to the attention of and observed by all staff in the area under their responsibility.
- Responsible for ensuring that Waste Segregation posters are displayed in appropriate places to inform staff on adequate waste segregation
- Ensuring that their designated waste storage areas (internal or external) are kept clean and tidy and free from loose waste and items for storage.
- Ensuring any lockable waste bins are always kept locked shut except when being filled.

The Health & Safety Manager

The Health & Safety Manager is responsible for providing pro-active advice and support to the Waste Manager to minimise the H&S (manual handling, falls and trips), and fire safety risks caused by waste.

- Ensuring that this policy and the procedures it contains, particularly regarding waste segregation are brought to the attention of and observed by all staff in the area under their responsibility.
- Responsible for ensuring that Waste Segregation posters are displayed in appropriate places to inform staff on adequate waste segregation.
- Ensuring that waste bins in their area are kept clean.
- Ensuring that their designated waste storage areas (internal or external) are kept clean and tidy and free from loose waste and items for storage.
- Ensuring any lockable waste bins are always kept locked shut except when being filled.

Cleaning staff

Cleaning staff are responsible for:

- Emptying domestic/recycling office bins.
- Ensuring the correct bin bags are placed in the relevant bins (clear for recycling waste, black for domestic waste).
- Ensuring waste is placed in the correct external waste bins.
- Reporting any areas showing poor segregation practice (food waste in recycling bins, recycling waste in domestic waste bins) to the Waste Manager so that the area involved can be advised and training provided.

Engineers

Engineers are responsible for:

- Collecting redundant equipment and other items from job sites which are Aircon Groups' responsibility for disposal.
- Transferring waste (Redundant equipment and other items as above) from jobsite to Aircon Group main waste compound and placing the waste items in the correct bay, bins, or container.

Aircon Group Sub contractors

Aircon Group sub-contractors are responsible for ensuring all wastes they produce whilst on site are managed and disposed of in accordance with this policy. Contractors who transport Aircon Group waste must be suitably licensed waste carriers or where required, waste brokers, with evidence provided (waste carriers licences). Paperwork for any waste streams leaving the Aircon Group control must be obtained in the form of consignment notes (for hazardous waste) and waste transfer notes (non-hazardous wastes).

7. DEFINITION OF WASTE

Under the Waste Framework Directive (European Directive (WFD) 2006/12/EC), waste is “*Any substance or object the holder discards, intends to discard or is required to discard*”.

European Waste Catalogue (EWC)

The European Waste Catalogue (EWC) classifies waste materials and categorises them according to what they are and how they were produced. The EWC uses a 6 digits code (EWC code) to reference waste streams. The EWC is used on Waste Transfer Notes and Hazardous Waste Transfer Notes in all waste transfer operations.

Controlled Waste

Controlled Waste is waste that is subject to legislative control in either its handling or its disposal under the Controlled Waste Regulations 1992.

The types of wastes covered include all domestic, commercial, and industrial waste. All waste produced by the Aircon Group is classed as controlled commercial waste.

Hazardous Waste

Hazardous waste is waste that poses substantial or potential threats to public health or the environment. Waste is legally classified as hazardous if it is covered under the Hazardous Waste Regulations 2005 and it will be listed with a star (*) in the European Waste Catalogue (EWC).

Confidential Waste

Confidential waste are wastes that contain confidential information. Confidential information can be defined as:

- Any material that contains information of a personal nature - that can identify a living individual or relates to an individual under the 1998 Data Protection Act e.g. patient names, details of medical condition & treatment, staff personal details.
- Any information classed as ‘Business Sensitive’ e.g. financial data.

If there is any doubt regarding whether the information contained is ‘confidential’, disposal as confidential waste is advisable therefore reducing any potential risk.

All information has a life cycle and the Aircon Group has adopted the guidance issued on the government website from the Information Commissioners Office <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation> which gives guidance on how long the different types of information should be kept for.

8. DUTY OF CARE

As a producer of waste, the Aircon Group has a legal 'Duty of Care' to make sure its waste is handled safely and only passed to people authorised to receive it.

For any waste removed from Aircon Group premises, the designated waste contractor will have to supply a Waste Transfer Note (WTN) for controlled waste, and a Hazardous Waste Consignment Note (HWCN) for hazardous waste.

No waste may leave the Aircon Group without a Waste Transfer Note or Hazardous Waste Consignment Note.

Waste Transfer Notes (Controlled waste)

Before any Controlled waste leaves the Aircon Group a Waste Transfer Note (WTN) (**Appendix A**) must be produced ensuring all the required information is put onto the form. The form must be signed by an authorised Aircon Group officer and be given to the waste carrier when they come to collect the waste. For regular collections, an annual waste transfer note can be set up in advance of the first collection. Waste transfer notes must be retained for two years following the disposal of the waste.

Hazardous Waste Consignment Notes (Hazardous waste)

Before any hazardous waste is removed from the Aircon Group a Hazardous Waste Consignment Note (HWCN) (**Appendix B**) must be completed ensuring all relevant information is put onto the form. This form cannot be completed annually but must be completed for each load. Waste consignment notes must be retained for three years following the disposal of the waste.

Duty of Care Audits

It is Aircon Groups' responsibility to make sure its waste contractors are registered waste carriers and are taking the waste to legitimate sites. As a result, the Aircon Group has a legal responsibility to conduct Duty of Care audits to ensure the facilities receiving the waste handle and treat our waste in a safe, compliant and sustainable manner.

9. OTHER LEGISLATIVE AND REGULATORY REQUIREMENTS

Aircon Group is committed to following all applicable waste legislation, statutory guidance, and other environmental requirements to which it subscribes, as well as to adhere to industry best practice when possible. The Managing Director is responsible for ensuring that Aircon Group adheres to all such legislation through the active support and guidance of the Waste Manager. The Aircon Group is fully committed to cooperating with regulators, such as the Environmental Agency, the Water Authority, the Health & Safety Executive and DEFRA.

Landfill Tax

This is a tax on the disposal of waste. It aims to encourage waste producers to produce less waste, recover more value from waste and to use more environmentally friendly methods of waste disposal.

Waste Management Licensing Regulations 1994

The Site Waste Management Plans Regulations 2008

A site waste management plan (SWMP) is created to enable businesses to plan and strategize how any waste from the site will be managed or disposed of. They must be produced at the start of the project and monitored throughout (**Appendix C**). SWMPs may cover:

- Decisions regarding which waste management contractors will be hired to collect and dispose of the site waste.
- Which types of waste are likely to be generated from the construction site.
- The volume of waste likely to be generated throughout the project.
- Which techniques will be used to manage which types of waste e.g. recycled, reused or reduced.
- Who will be the responsible persons regarding waste disposal.

Site waste management plans used to be compulsory by law for builds worth over £300,000, under the Site Waste Management Plans Regulations (2008), but their compulsory nature was repealed in 2013. Despite this, it is highly recommended for all project managers to produce this planning document – this is for several reasons:

- Saves you money- plan how you will manage waste and resources and efficiently control the storage and use of all resources and produced waste. This will also allow you to devise new ways of cutting costs.
- Protects the environment- reduce waste, recycle where possible and reduce the risk your waste poses to the local, and wider, environment.
- Strengthens your reputation and business prospects: An SWMP will boost your profile and enhance your reputation, helping you secure more tenders in the future.

The Waste (England and Wales) Regulations 2011

This regulation provides the requirements for using the waste hierarchy. The waste hierarchy is a classification of waste management options in order of their environmental impact, such as: reduction, reuse, recycling and recovery.

Hazardous Waste Regulations 2005

Hazardous waste is essentially waste that contains hazardous properties which if mismanaged has the potential to cause greater harm to the environment and human health than non-hazardous waste. As a result, strict controls apply from the point of its production, to its movement, management, and recovery or disposal.

Waste Electrical and Electronic Equipment Directive

Waste Electrical and Electronic Equipment (WEEE) directive aim to reduce the quantity of waste from electrical and electronic equipment and increase its re-use, recovery, and recycling.

Landfill directive

This directive aims to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills and setting targets for the reduction of biodegradable municipal waste going to landfill.

Batteries directive

This directive aims to improve the environmental performance of batteries and minimise the impact waste batteries have on the environment by banning the disposal of batteries in landfill or by incineration.

Carriage of Dangerous Goods (CDG) Regulations

The CDG Regulations are the UK's transposition of the EU ADR 2009 Regulations

- Correctly classify the waste.
- Package the waste according to specific standards.
- Label the waste correctly.
- Provide the collector with a consignor's declaration Under the CDG and as a consignor of hazardous waste, the Aircon Group may require an annual Dangerous Goods Safety report.

10. WASTE GENERATED BY AIRCON GROUP

Aircon Group produces a wide variety of waste streams.

Domestic Wastes

This category covers all the wastes which could typically be produced in a domestic / household setting such as general (black bag) waste, dry mixed recycling, bulky items, etc.

Hazardous Wastes

This category covers wastes not specific to a Domestic setting, but which have a particular property making them hazardous such as, oil, refrigerant, chemicals, waste electrical and electronic equipment, etc

11. WASTE GENERATED BY OTHER ORGANISATIONS

Contractors working for the Aircon Group

All contractors employed or working on behalf of Aircon Group will make the necessary arrangements to comply with this policy

Waste carriers and contractors are required to follow on site rules for vehicle parking, loading/unloading, security and speed limits whilst on either the Aircon Group premise or that of their clients.

12. SEGREGATION OF WASTE

Waste segregation policy

Waste segregation in line with this policy is not optional but MANDATORY.

Domestic waste segregation – Recycling scheme

- Aircon Group are gradually phasing in the provision of recycling facilities (i.e. bins) throughout the company. Departments which have not been supplied with recycling facilities do not need to separate dry mixed recyclables (in clear bags) until supplied with the facilities to do so.
- When recycling facilities are deployed to an area, different communication channels will be used to make staff aware of the new segregation procedure. Every effort will be made to adapt to local circumstances but there are no requirements for Aircon Group to formerly consult with the area staff prior to roll-out.
- Once supplied, full segregation of dry mixed recyclables by all staff at all time.

13. STORAGE OF WASTE

Waste bins

- The Waste Manager has final authority on the chosen type and model of recycling waste bin supplied when recycling is introduced to any area. The type and model of recycling waste bins supplied by Aircon Group are the default option throughout the business for all areas.

Choosing waste containers and bags

Subject to securing the relevant and appropriate assurances, the Waste Manager has final authority on the type of waste containers and bags used by the company, to ensure containers and bags are compatible with the Aircon Group policy and procedures, internal transport arrangements and our nominated waste contractors

Purchasing of waste containers and bags

- Bags for domestic (black) and recycling (clear) waste are purchased and supplied by the Waste Manager.
- Confidential waste bags are supplied by the Waste manager through our nominated confidential waste contractor.

Internal storage

Domestic wastes may under no circumstances be mixed in storage areas.

- Waste must not accumulate in corridors, lobbies, or other unsuitable places.
- Waste must not under any circumstances obstruct access routes, fire escape routes or fire doors.
- Waste items must not be placed in areas that are likely to cause a tripping hazard.
- Waste containers, waste cupboards and waste bins must be kept shut and locked when not in use to prevent unauthorised access or access to waste by vermin.

External storage (Warehouse)

- Waste must not be stored loose in any external areas – See fly-tipping section 14 below.
- Waste wheelie bins or any other containers must be kept shut and locked when not in use to prevent unauthorised access or access to waste by vermin.

Spills

- It is the responsibility of all staff within their work area, to be aware of any procedure regarding 'Spillage' of substance in their area of work, if applicable. To know where the spill kit is located and what course of action is required to clean up the spillage.
- Further guidance on chemicals can be found in the COSHH Policy available on the intranet at <https://www.hse.gov.uk/comah/sragtech/techmeasspill.htm>.
- Any materials used in the containment and absorption of spills should be treated for disposal as the material spilled. For instance, contaminated materials used to clean chemical spills should be disposed as chemical waste cytotoxic/cytostatic medicines spills should be disposed as cytotoxic/cytostatic waste.

14. FLY TIPPING (Warehouse)

It is the responsibility of Department producing the waste to ensure a suitable waste disposal route is identified in line with this policy and associated procedures. Any waste left unattended in internal areas or on grounds with no arrangements for disposal will be considered fly-tipping.

Fly-tipping of waste will not be tolerated and all occurrences will be fully investigated.

15. DISPOSAL TO DRAINS AND SEWERS

Under no circumstances can any discharges to sewers other than domestic sewage be made.

Currently Aircon Group it is not permitted to discharge anything to sewer other than the above. Any uncontrolled releases to sewers put us in breach of the Trade Effluent Regulations (Water Industry Act 2003) and expose us to prosecution from the regulatory body (for Rotherham and Thornaby sites this is Yorkshire and Northumbria Water respectively). Should a spill occur which results in chemicals, oils and other toxic materials to be released to drains or sewers, contact the Waste Manager immediately.

16. AUDITING

It is the responsibility of the Waste Manager to conduct a monitoring and auditing programme for all areas for waste management to ensure the correct implementation of this policy.

The monitoring and auditing programme will follow a pro-format audit schedule with a wide scope ranging from adequate waste segregation, staff awareness of operational procedures for waste management, through to opportunities for waste minimisation.

Departments Managers will have full responsibility for addressing any negative audit findings and taking adequate corrective actions.

17. TRAINING AND AWARENESS-RAISING

This Waste Management Policy does not have a mandatory training requirement, but the following non-mandatory training will be available:

- Waste management training will be available, undertaking the training will be risk driven should an area display poor practice or understanding of waste segregation
- Waste management awareness will be actively promoted through a number of communication channels.

18. REVIEW AND REVISION ARRANGEMENTS

The Waste Manager will be responsible for reviewing and revising as appropriate this Policy no later than 3 years after its publication. Should legislation or any other changes of circumstances arise; this Policy will be updated accordingly prior to the 3 year's timeframe.

For the successful implementation of this policy, the Waste Manager will monitor performance herein.

19. LINKS TO OTHER ORGANISATION POLICIES/DOCUMENTS

The following policies and procedures should be consulted alongside this Policy document:

- Health & Safety Policy
- Environmental Management Policy
- COSHH Policy

20. REFERENCES

- Hazardous Waste Regulations 2005
- Health & Safety at Work Act 1974
- The Environmental Protection Act 1990
- Waste Management Licensing Regulations 1994 (amended 1995, 1996, 1997 and 1998)

- The Waste Management (Miscellaneous Provisions) Regulations 1997.
- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Protection (Prescribed Processes and Substances) Regulations 1991 ²
Controlled Waste Regulations 1992 as amended 1993.
- Environmental Act 1995
- Control of Pollution (Amendment) Act 1989
- Controlled Waste (Registration of carriers and seizure of vehicles) Regulations 1991
- Transport of Infectious Substances Revision 2 March 2006
- Landfill Tax Regulations 1996 as amended 1996 & 1998.
- Waste Minimisation Act 1998
- Carriage of Dangerous Goods Regulations
- Waste of Electrical & Electronic Equipment (WEEE) Regulations
- The Site Waste Management Plans Regulations 2008

21. DISCLAIMER

It is the responsibility of all staff to check the organisations shared drive [..\..\..\4. H & S\Aircon Group](..\\..\..\4. H & S\Aircon Group) to ensure that the most recent version of this document is being referenced.