



GREEN
COMPASS
Giving Waste Direction

CWMPAWD
GWYRDD
Cyfeirio Gwastraff

Guidance notes to be used in conjunction with

**PAS 402:2025 Waste resource management
Specification for performance reporting**

Oct 2025 v3

Table of contents

Introduction	4
Important notice	4
The purpose of this guidance	4
1 General	5
When does PAS 402 apply?	5
What does PAS 402 require?	5
What is PAS 402:2025?	5
2 Getting started	8
Establishing a baseline for the report.....	8
Why establishing a baseline is important.....	8
How to establish a baseline	8
Section 2 Relevant Documentation	9
3 Terms & Definitions	9
4 The Publicly Available Report	10
Where is the report published?	10
How should the report be written?.....	10
What format should the report be in?	10
Who should approve the report?.....	11
How should the report be approved?	11
Improvement actions and plans	12
5 Scope of operations	13
What is the Scope of operations?.....	13
What should the scope include?	13
Why is the scope important?.....	15
How to write about exclusions	15
6 Client relationship.....	16
Why is this part of the report important?.....	16
What information should be documented?	16
How will End-of-Waste processes or recycle specifications be audited?	17
Section 6 Relevant documentation.....	17
7 Impacts and risks	19
Why is this important?.....	19
What sort of risk assessment can be done for the Standard?	19
Unplanned incidents and business continuity	21
Why produce a business continuity plan?	21
Section 7 Relevant documentation.....	23

8	Operational management	25
	What is operational management?	25
	How to write about operational management	25
	Use and maintenance of plant and machinery	28
	Resource management	28
	Section 8 Relevant documentation	29
9	Competence.....	30
	Why competence is important	30
	How to approach competence	30
	Section 9 Relevant documentation	32
10	Corrective actions, preventive actions and improvement actions.....	33
	What is the difference between these actions?	33
	How to evidence these actions.....	33
	What does management of legal and other requirements cover?	37
	What evidence could be provided?	37
	Section 10 Relevant documentation.....	39
11	Performance review	41
	Why the performance review is vital.....	41
	How to conduct a performance review	41
	Completing Table 2 of Section 11.2 of the Standard.....	42
	Completing Table 3 of Section 11.3 of the Standard.....	43
	Data sources for the annual report.....	43
	Section 11 Relevant documentation.....	45
12	Index of Examples & Associated Tables	46
13	Relevant documents table	47

Introduction

Welcome to the guidance notes for *PAS 402:2025 Waste resource management – Performance Reporting - Specification*. These guidance notes are intended to explain and clarify the requirements laid out in the standard and support you in achieving Green Compass membership.

Important notice

It is essential that this document is read with the standard as it details specific requirements that must be met in order to meet the various clauses contained within the specification.

This document is only applicable to the PAS 402:2025 Waste resource management – Performance Reporting – Specification ('the Standard').

The purpose of this guidance

The purpose of this guidance is to further describe the requirements of the Standard and inspire ideas and discussion around how the Annual Report ('the report') could be set out to make it unique to the organization.

This guidance is intended to be used with the Standard and not as a step-by-step guide to implementation. In other words, if only this guidance is followed without also reading the Standard, the physical audit and report may not be sufficient to pass the inspection.

That said, the intention behind this guidance is to provide enough support to create a compliant report and achieve a successful site inspection.

1 General

When does PAS 402 apply?

The Standard is applicable to waste resource management organizations that have the benefit of an environmental permit, or waste management licence or operate an exempt activity.

It is not applicable to waste intermediaries that operate between waste producers and waste management facilities.

What does PAS 402 require?

PAS 402 requires a waste resource management organization to report:

- how it conducts specific waste resource management activities (Clause 4 to Clause 11); and
- the material recovery rates it achieves (Clause 12).

What is PAS 402:2025?

The Standard is a 'Publicly Available Specification' (PAS) developed collaboratively by key stakeholders and industry experts and produced by the British Standards Institute (BSI). Publicly Available Specifications provide a benchmark for industry-wide best practices, setting standards for products, services, and processes.

PAS 402:2025 specifies the requirements for demonstrating a waste management organization's environmental, quality and health and safety performance. To gain a PAS 402 certificate, an organization must demonstrate they have fully implemented the criteria set out in The Standard and described further in this guidance.

The standard aligns with sections of the well-known management system frameworks ISO 14001 (environment), ISO 9001 (quality) and ISO 45001 (health and safety). The table below summarises the differences between a performance standard and an ISO management system framework.

Table 1.1 showing comparison between PAS 402 and ISO Standards

	PAS 402 Waste Performance	ISO Standard
Who is it for?	PAS 402 is specific to the waste industry and can only be held by sites that receive waste and transfer it to others	The ISO frameworks are generic, intended for a wide range of organizations.
Management System or Performance Standard?	PAS 402 is a performance standard that requires: • A verified, publicly available annual report specific to waste handling activities on site • Publication of externally verified waste recycling and recovery data	ISO standards set out a management system which focuses on the 'plan-do-check-act' cycle. The ISO standards provide frameworks for continual improvement. This framework is useful in supporting the requirements of PAS 402.
Coverage	Health, safety, environment and quality specific to the running of waste management sites.	Various combinations of health, safety, environment, quality etc. according to which ISO standard(s) are in place.
Audit accreditation	PAS 402 auditors are all UKAS accredited and are audited themselves twice a year by UKAS.	There are still many certification companies in the marketplace that are not UKAS accredited. Their business practices are not checked by other auditors.
Purpose of external auditing / verification	To confirm that the: Waste data is transparent and accurate. • Site activities are as described and compliant with health, safety, environment and quality requirements. • The client/customer relationship promotes good waste management.	To demonstrate compliance with the ISO standards' 'plan-do-check-act' cycle and continual improvement.
Audit expertise	PAS 402 auditors are waste sector specialists and fully understand the complications of the waste industry.	ISO auditors typically have a range of specialist areas so they can audit many different organizations; they rarely have one focus area.

	PAS 402 Waste Performance	ISO Standard
Benefit to organization	PAS 402:2025 is increasingly requested whilst making tenders. External proof that waste data sent to the Environment Agency and customers is transparent and accurately reported. Proof that site operations have integrity. The annual report should be a detailed and presentable marketing tool to advertise the company.	ISO standards are increasingly requested whilst making tenders. External proof that the organization considers health, safety, quality and/or the environment as part of their business activities.
Benefit of certification to clients / customers / authorities	Verified proof that a waste supplier's recycling and landfill diversion rates are accurate. Provision of customer-specific recycling rates and landfill diversion data. A full site annual report including verified proof of planning, permits, competence, training, duty of care etc. that can be passed on to all other clients/customers. For the EA: assurance that the quarterly returns reported to them are accurate.	The Environment Agency (EA) list ISO 14001 (environmental management) as an acceptable management system for permit compliance. Many companies expect their suppliers to have ISO 14001 as a minimum.

2 Getting started

Establishing a baseline for the report

The report is best produced after carrying out a baseline assessment of the organization's current environmental, quality and health and safety performance, practices, procedures and policies. This might include a desktop study and physical site inspection relating to all 3 areas, to fully identify how all the waste management activities are managed within the organization.

Why establishing a baseline is important

Making assumptions about where to start from can easily make the rest of the implementation journey a fraught nightmare. Establishing the organization's environmental, quality and health and safety management performance without a true baseline makes it challenging to set meaningful improvement actions or goals.

How to establish a baseline

Establish the scope of the baseline assessment - this includes the physical boundaries, different locations and description of all the business activities and services falling under the scope of environment, quality and health and safety. State exclusions where appropriate.

Process mapping - identify the inputs and outputs as a result of the service or activity. This might lead to a useful graphic showing how waste is brought on to site, processed and removed from site as different waste streams.

Site activities could be mapped out on a plan, for example, storage areas, sorting, weighing, car parking, office facilities, neighbours, drainage, waste segregation, quarantine areas, monitoring points, site practice, equipment inspection, use of PPE, recognition of potential nuisance issues such as noise, odour and litter.

A good baseline assessment also includes:

- Policies covering the environment, health, safety, quality, diversity and equal opportunities
- All environmental permits & waste management licenses
- Planning permissions
- Exemptions
- Operational procedures
- Risk assessments
- Safe systems of work/method statements
- Pollution prevention plans (e.g. Dust & Emissions Management Plan, the 'DEMP')
- Legal documentation and/or registers
- Management system documentation
- Business continuity plans/contingency planning
- Training matrices and records, competency & qualifications
- Audit reports (internal & external)

- Incident reports/accident books, Improvement actions / notices
- Correspondence with regulators/interested parties – the Regulator, Local Authority, Health & Safety Executive, customer complaints, neighbourhood dispute/resolutions

NOTE

At the end of some sections in this guidance there is a small table titled 'Relevant Documentation' listing documents which should be an integral part of the PAS 402 audit. The organization may already have these documents as part of an ISO management system, which are ideal for use as evidence for the Standard and show how ISO systems and PAS 402 work well together.

Section 2 Relevant Documentation

1	Process map(s)
2	Integrated systems policies

3 Terms & Definitions

Please take time to read through the terms and definitions. Many of these have been re-written since the previous 2013 standard as a result of changes within waste legislation.

It is not permitted to replicate legal wording in a PAS, therefore all definitions have been written to reflect their meaning specifically within the Standard. This is another reason to read through carefully and check that the way the organization's report uses these terms and definitions matches the meaning within the Standard.

4 The Publicly Available Report

Where is the report published?

The publicly available report is published on the Green Compass website at <https://www.greencompass.org/directory/> which includes information on the status of each organization's membership.

Green Compass encourages organizations preparing to become members to have a look through the existing reports whilst considering how to produce one.

How should the report be written?

The Standard requires the organization to produce a publicly available annual report that contains the information in Clauses 4 to 12. This is an opportunity for the organization to tell the world in its own words about its performance. Equally, the report must give a full and true picture of the organization that is representative of its performance.

It should be written in accordance with the principles of transparency, completeness, relevance, accuracy, comparability, clarity, timeliness and auditability. Make sure that any claim is substantiated and clarify any point that could lead to a misunderstanding or misrepresentation such as data gathering methods, changes to activities or changes to site boundaries.

It is important to approach this guidance from a marketing point of view, to showcase the best practices within the organization. Regard the report as an opportunity to produce an accurate and engaging document not only for the organizations' customers, but their customers as well.

Please note that the report should not be written in the same way as an ISO System Manual with references to numbered and controlled documents. For example, if system documents are occasionally referred to (which is discouraged), the document control numbers should not be written in, only the title.

Reference to system documents and use of appendices is not appropriate for the report. This is because readers won't have immediate or easy access to the referenced documents and appendices are not permitted. It is important that readers of the report can understand how the organization manages waste without having to read other documents alongside it. The only exception is a bespoke environmental permit, which should be included in full at the end of the report as an appendix.

What format should the report be in?

There is no specific layout or format; it is not necessary to use the numbering from the Standard as long as all the required information is in the report, and each statement made can be evidenced for the verification process.

Preparing the report does not need to be expensive; make sure that the information and data gathered is presented in a format that is suited to the organization. Flow charts, drawings or photographs can be used when describing the organization's operations and processes. Appropriate photos or graphics can make a positive difference to how easy the report is to read and understand and are encouraged.

Who should approve the report?

The report shall be approved by top management. Top management usually consists of a person or group of people who direct and control an organization at the highest level e.g. Managing Director, Chief Executive, Owner etc.

The report is a reflection on the working practices of the organization and its commitment to providing a high-quality service in a safe working environment. In order to successfully achieve these goals, it is imperative that this commitment is driven by top managers.

How should the report be approved?

The report shall be approved in writing by top management which may include:

- A signature at the front of the report
- A foreword from a senior person

System evidence may include minutes detailing final approval of the report.

Improvement actions and plans

Improvement actions completed during the reporting period must be described in full, along with improvement plans for the next operational year. The scale of the actions may be varied, from putting in a new fire prevention system or a new piece of equipment to cultural change projects. Where budgets are tight, improvement actions may focus on increased maintenance of older equipment or improving health, safety and environmental awareness on site.

Timescales for improvement projects may last from a week to introduce a new form, or several years to put in a new process; yearly progress can be reported where timescales are long. Commercially confidential information should not be reported as this is a publicly available report. However, auditors can be safely informed of these projects on audit day as they must protect confidential information under UKAS rules.

There is no set number of improvements required as long as overall improvement for health, safety, quality and the environment can be demonstrated year on year.

Plans for the next operational year should be described even where there is uncertainty that they will go ahead, to demonstrate that discussions have been held regarding business development for the future that includes health, safety, quality and the environment.

A table format may be useful in setting out improvements already achieved, those that are ongoing and those that are planned for the near future. Include project completion dates for what has already been achieved and dates for future improvements where possible.

Table 4.1 Improvement Action Plan

Objective	Target
Enhanced TCM cover	Training for PW to obtain WAMITAB Level 4 by year end
Improve the density of plastic film to reduce skip lifts	Purchase small vertical chamber baler for plastic film by Sept 2026
Reduction in fossil energy consumption	Investigate feasibility and options for installing wood fired air heater for sorting shop by end June 2026
Improve resilience to climate change – use rainwater instead of freshwater where practicable, e.g. for hosing down yard	Install rain barrels by end of Sept 2026

Example extract

This information can be placed in the report wherever it best suits your report layout. It can go at the beginning to highlight the outcome of good processes right from the start. Previously it was included in section 11 'Performance review' just before the data tables. An alternative suggestion is section 10 'Corrective, preventive and improvement actions'.

5 Scope of operations

What is the Scope of operations?

The organization should give a brief description of its operations e.g. what waste is accepted, where they are based etc. as well as details of their environmental permit/exemption including any reference numbers and the name as detailed on the permit. The organization does not need to go into great detail regarding the conditions of the environmental permit; a brief summary of the type of waste and associated limits will be enough (see Example 1).

This section of the report should immediately inform the reader:

- The size and location of the site(s) granted membership of Green Compass
- That the organization is legally authorised to conduct its waste management operations
- What type of waste operation is carried out
- What types of waste can and cannot be accepted

What should the scope include?

Example 1: Scope of operations

Waste Company XYZ is part of the Alphabet group of companies; we operate a waste transfer station (WTS) and recycling facility from our site in Pembroke Dock, Pembrokeshire. We accept waste directly onto our site from companies and individuals.

All materials are sorted and segregated via a loader, trommel and picking station. Segregated materials are sold for reuse and recycling purposes. We process clean incoming aggregates into end-of-waste products such as 6F5 that are sold separately to construction companies. The material must meet clients' specification requirements.

Materials we are unable to recover are disposed of via landfill as a last resort. This includes trommel fines tested for carbon content that are suitable for inert landfills.

Our Environmental Permit (in the name of waste company XYZ reference EPR AB12345CD) allows us to accept inert, metal, and degradable household, commercial and industrial waste. We are also licensed to accept hazardous waste (Asbestos).

Our maximum capacity of operation annually is 75,000 tonnes. Table A displays our storage and time limits –

Table 5.1 – Environmental Permit Operational Limits

Permit/Exemption	Type of waste	Operations	Limits
EPR AB12345CD Standard Rules Permit SR2022 No 4_ non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage	Waste paper or cardboard	Sorting, separation, screening, baling, shredding, compaction and bulking.	Site has capacity for 700 tonnes per week
	Waste plastic	Sorting, separation, screening, baling, shredding, compaction and bulking.	Site has capacity for 700 tonnes per week
	WEEE (waste electrical & electronic equipment)	Manual sorting only	Site has capacity for 100 tonnes per week

Example

Why is the scope important?

Defining the scope is intended to clarify the boundaries of the organization to which the PAS will apply, especially if the organization is part of a larger organization of the same location. Include an organization chart to make company boundaries clear, highlighting who manages health, safety, quality and environmental issues and what top management support these roles have through the reporting lines.

The credibility of the report and the organizations' systems only applies to the waste activities within the organizational boundaries.

If part of an organization is excluded from the scope, then the organization should be able to explain the exclusion.

How to write about exclusions

The organization should outline all of its operations that it has excluded from the scope of the report including an explanation of why it has been excluded – for example

Example 2: Exclusions

"Waste Company XYZ is part of the Alphabet group of companies that conducts a number of different operations at their site in Pembroke Dock. As well as the Waste Transfer Station and Recycling Facility, the parent company conducts a quarrying operation and a small automotive business at the same site.

Although the different activities are separate entities in business and legal terms, Waste Company XYZ decided to include the automotive business within the scope of their operations as all of their vehicles are serviced and maintained there and therefore it was felt that the garage played an integral role in the waste operation. However, the quarrying business had no impact on the waste management operations and therefore this part of the site was excluded from the scope of their report and systems."

It is not permissible to make exclusions if the activity impacts upon or deals with the impacts of the waste management organization.

6 Client relationship

Why is this part of the report important?

Readers of the report should know how customer's requirements are met and how customer satisfaction is enhanced so that there is no ambiguity in the service level agreement and/or service provision.

Please note that from the 2025 version of the Standard, clients are classified as waste producers and/or receivers of outgoing materials including end of waste product.

It should be clear how the organization works to foster good working relationships with clients because client relationships are part of demonstrating that the quality objectives of the organization are measured and met, and that the integrity of the organizations' policies and procedures is kept up to date and followed.

Strong client relationships also minimise the health, safety & environmental risks associated with service provision to both the client and the organization's staff.

Include in this section how the organization communicates waste pre-acceptance criteria for waste producers and specifications of recycle for waste receivers, to minimise the environmental, financial & health and safety risk of accepting/handling waste outside of the agreed operational practices.

What information should be documented?

The client's requirements can be identified verbally; however they should be followed up by a documented contractual agreement containing details of:

- Type of waste, quantity and quality
- Storage/containment
- Frequency
- Client site health & safety issues
- Cost/pricing structure
- Payment terms and conditions
- Acceptance criteria
- Requests for codes of practice/instruction at client site

The case study below outlines an example that could be shown to the auditor during the audit. However, this level of detail is not expected within the report, which simply needs to describe the process of starting and maintaining effective client relationships.

Example 3: Waste Company EYZ and their client The Building Firm

Waste Company XYZ was contacted by a client company ('The Building Firm') for waste removal at a construction site. The client verbally described the need to dispose of 5 different wastes and the aim to recover as much recycling as possible. The waste streams consisted of plasterboard, bricks, cardboard, aggregates and mixed waste; however, space was very limited at the site. XYZ offered a solution of separate containers of varying sizes to accommodate the space available.

The Building Firm asked XYZ to help them. Aggregates were prioritised as a stream to store separately on site so they could go into the aggregate production process for end-of-waste at XYZ's site. The Building Firm made sure that no aggregates were placed into mixed skips on their construction site.

XYZ suggested that due to the limited space at Building Firm's construction site, further segregation of the mixed waste could take place at their transfer station, where it would be sorted to recover any suitable materials.

XYZ issued The Building Firm with a written contract detailing the service which was accepted.

Following the first month of service, a report was produced for The Building Firm detailing the amount of material recovered for each waste stream and the amount of waste sent to landfill.

The Building Firm were extremely pleased with the service as they were able to recycle more waste than anticipated. On completion of the job, a customer satisfaction survey was emailed to the client in order to gain feedback on the services provided and to identify further opportunities for improvement.

How will End-of-Waste processes or recycle specifications be audited?

If the organization produces materials to a client specification or for use as end-of-waste (following various protocols such as the composting or aggregates resource frameworks, brought in since 2026), this must be described within the report.

Evidence of compliance with client specifications/end of waste criteria includes management system documents such as the Factory Production Control (FPC) and evidence of input waste characterization with associated testing results, product testing regime and results, delivery notes and records of associated plant and machinery maintenance/calibration, for example.

Section 6 Relevant documentation

3	Customer requirements procedure
4	Contract or agreements
5	Client Site Maps/plans
6	Customer satisfaction surveys

7	Resource Framework documentation
8	Client material specification requirements

7 Impacts and risks

Why is this important?

Understanding what the most significant environmental, health and safety and quality impacts of the site activities are, and how they have been identified, needs to be made clear in the report. Some of the impacts might have the potential to have a major impact on the environment, human health or quality performance and others may be technical permit breaches such as issues with documents in the management system.

Some of these impacts and issues may be directly in the organization's control and others, like climate change, will not be. In either case it is important to identify the risks, prioritise them and demonstrate that appropriate action is being taken. Control measures must be identified and implemented as required, to manage the level of risk associated with the business operations. Measures may be designed to meet the various requirements of the environmental permit, insurance provision or health and safety legislation alongside client requirements.

In this section of the report, the organization's top priorities for risk management can be listed along with the associated mitigation measures.

What sort of risk assessment can be done for the Standard?

Organizations have limited time and resource which means identifying the actions to prioritise is essential. Organizations may employ suitably qualified staff internally and/or external consultants to produce a business risk assessment and suggest ways to implement effective controls where possible. This can be part of the broader business risk assessment that includes politics, finance, technical and social issues alongside the health, safety, quality and environmental considerations. Typically, organizations already have these in place and it may be easy to add to them.

Under health and safety legislation the results of risk assessments must be recorded and documented if the organization employs 5 or more people. A written risk assessment process may include the following:

- Creation of a risk register or matrix documenting identification and assessment. Details all the risks and associated impacts related to the organizations' activities, including how some of these combine to create larger risks.
- Description of the approach taken to assess the scale of risk for each activity, and the criteria for what should be prioritised. There may be a separate rationale for health & safety issues versus quality and environmental issues or all three may be integrated. It is important that the process is objective and repeatable.
- Summary of the control measures required with the expectation they are implemented.

Example 4: Risk Assessments

Waste Company XYZ operates a waste transfer station and recycling facility and employs an external health, safety & environmental consultant to work alongside the Technically Competent Manager (TCM) on site. Together they identify and evaluate the health, safety, environmental and quality risks associated with the waste activities.

XYZ's TCM and external consultant started their first risk register by writing a list of all the risks they could think of, assessing each risk individually and scoring it using the following criteria. The scores for harm and likelihood are multiplied to create the final risk score:

Table 7.1 – Example of a Risk Matrix

Likelihood		Potential severity of harm		
		Slightly harmful (1)	Harmful (2)	Extremely harmful (3)
Highly unlikely (1)	1 Trivial	2 Tolerable	3 Moderate	6 Substantial
Unlikely (2)	2 Tolerable	4 Moderate	6 Substantial	9 Intolerable
Likely (3)	3 Moderate	6 Substantial	9 Intolerable	

Example

The risk register rows were completed as follows for the health and safety risks:

Table 7.2 – Health & Safety Risk Assessment for delivery of waste to site

Potential hazard	Collision	Control Measure(s)	
Severity	3	One way system	Pedestrian walkways/barriers
Likelihood	3	Site speed limit	Pedestrian walkways/barriers
Risk	9	Use of reversing assistant	Hi-vis to be worn

Example

The risk register rows were completed as follows for the environmental risks:

Table 7.3 – Environmental Risk Assessment for dusts on site

Potential hazard	Dust	Control Measure(s)	
Severity	2	Daily checks	Cleaning routines for back of bays
Likelihood	3	Daily housekeeping	Dust suppression equipment installed inside and outside
Risk	6	Weather forecasting	Waste covered/stored correctly

Example

Table 7.4 – Environmental Risk Assessment for climate change

Potential hazard	Rainstorms	Control Measure(s)	
Severity	3	Regular emptying of yard interceptor	Weather forecasting
Likelihood	3	Daily housekeeping to keep yard free from debris that could get washed off-site	Increased maintenance of site pipework and drains
Risk	9		Leaks repaired on roofs asap

Regardless of priority, all control measures listed in the register were implemented. The TCM communicated the highest priority risks to managers and alerted relevant people, e.g. employees, visitors to the site etc., about the controls that are in place and their responsibilities for adhering to them.

The TCM and external consultant review all risk assessments periodically or when any change to the activity occurs, e.g. use of new machinery, new employees etc, to ensure that they are current and appropriate. The full list of risk assessments is listed in the register with review dates, so the TCM can plan when to carry out reviews.

Table 7.5 – Risk Assessment Document Register

Ref No.	Date	Risk Assessor	Title of risk assessment / activity assessed	Review Date
HSRA01	01/01/2025	J. Bloggs	Loading/Unloading of skips	01/01/2026
HSRA02	01/04/2025	J. Bloggs	Use of Shredder	01/04/2026
ERA01	05/06/2025	F. Smith	Waste movements – dust management	05/06/2026
ERA02	10/07/2025	F. Smith	Climate Change – rainstorm management	10/07/2026

Example

Unplanned incidents and business continuity

Even the most efficient and best run businesses encounter unexpected problems from time to time. It is how the organization reacts to the situation that determines its future success. By anticipating and planning for unexpected and emergency situations, the organization can minimise its impact and subsequent disruption to normal operations.

Why produce a business continuity plan?

The Standard requires organizations to demonstrate how unplanned incidents and business continuity is addressed. The business continuity plan is expected to take into account breakdowns, emergency shut-downs and extreme weather events. Typically it focuses on where waste could be redirected to continue the contracted services for clients and considers how to support staff to make the best decisions during disruption.

The following topic suggestions are listed in the Standard:

- extreme weather (e.g., resilience management of the effects of climate change);
- major accidents;
- spillages;
- fire;
- vandalism;
- market failure;
- loss of technical competence;
- insurance provision; and
- waste materials outside the terms of an environmental permit.

In the report, any of these topics can be highlighted if they are especially important to the organization so that readers can clearly see that the most challenging areas have been addressed and mitigation is in place. Clients can be reassured that working with the organization will be as good as it can be during a disruptive or emergency event, on various timescales.

Example 5: Business Continuity Plan

Table 7.6 – Business Continuity Plan

Issue	Area(s) of concern	Prevention Measures	Mitigation Measures
Extreme snowfall	Environment, Health and Safety, Financial, Quality	Information, awareness sessions, Resilience Plan showing which staff may be snowed in and unable to get on to site, vehicles made snow-ready.	Information, Instruction, training & supervision. Spill kits Interceptors
Loss of processing capacity	Financial, Quality, Health and Safety	Safe systems of work. Emergency procedures. Housekeeping and Maintenance.	Take materials straight to landfill. Take materials to other appropriate sites.
Fire	Environment, Health and Safety, Financial, Quality	Action the Fire Prevention Plan, make regular inspections of fire equipment, training.	Sprinkler system, fire extinguishers, fire alarms.

Example

Section 7 Relevant documentation

9 Risk assessment procedure
10 Risk assessment register
11 Safe Systems of Work / Method Statements
12 Business Continuity Plan

13	Emergency Preparedness Procedure
14	Working Plan
15	Incident Plan/Emergency Plan

8 Operational management

What is operational management?

Operational management refers to the link between policies, objectives and targets/ improvements and activities on site. The operational controls of the organization will determine the level of control it has in terms of the impact on environment, quality and health & safety as a result of its activities. Good control enables the organization to operate in an effective and efficient manner.

Make sure that procedures support legal compliance, client requirements and continual improvement. They should be amended or updated as activities, requirements, legislation, staff or technology changes.

How to write about operational management

In the report, describe how the organization identifies the equipment, operational control procedures or work instructions required to mitigate risks and how this is recorded. For example, by writing procedures, method statements and safe systems of work which address the issues and detail the actions needed to minimise environmental, health, safety and quality risk.

Explain the processes for including health, safety, quality and the environment when determining roles, responsibilities and accountability amongst staff. Implement procedures and establish checking mechanisms to ensure compliance

When preparing the report, the organization is not expected to detail every method statement and/or safe system of work that it has in place. A flow diagram summarising the main processes and activities that are undertaken by the organization, along with the operational control measures that it has in place, is a useful visual; see examples on the following pages.

As a minimum controls should include site capacities, multiple waste transfers where applicable, control of waste generation and decision making around choosing the best recycling outlets.

Example 6: How a waste company may describe site capacity controls

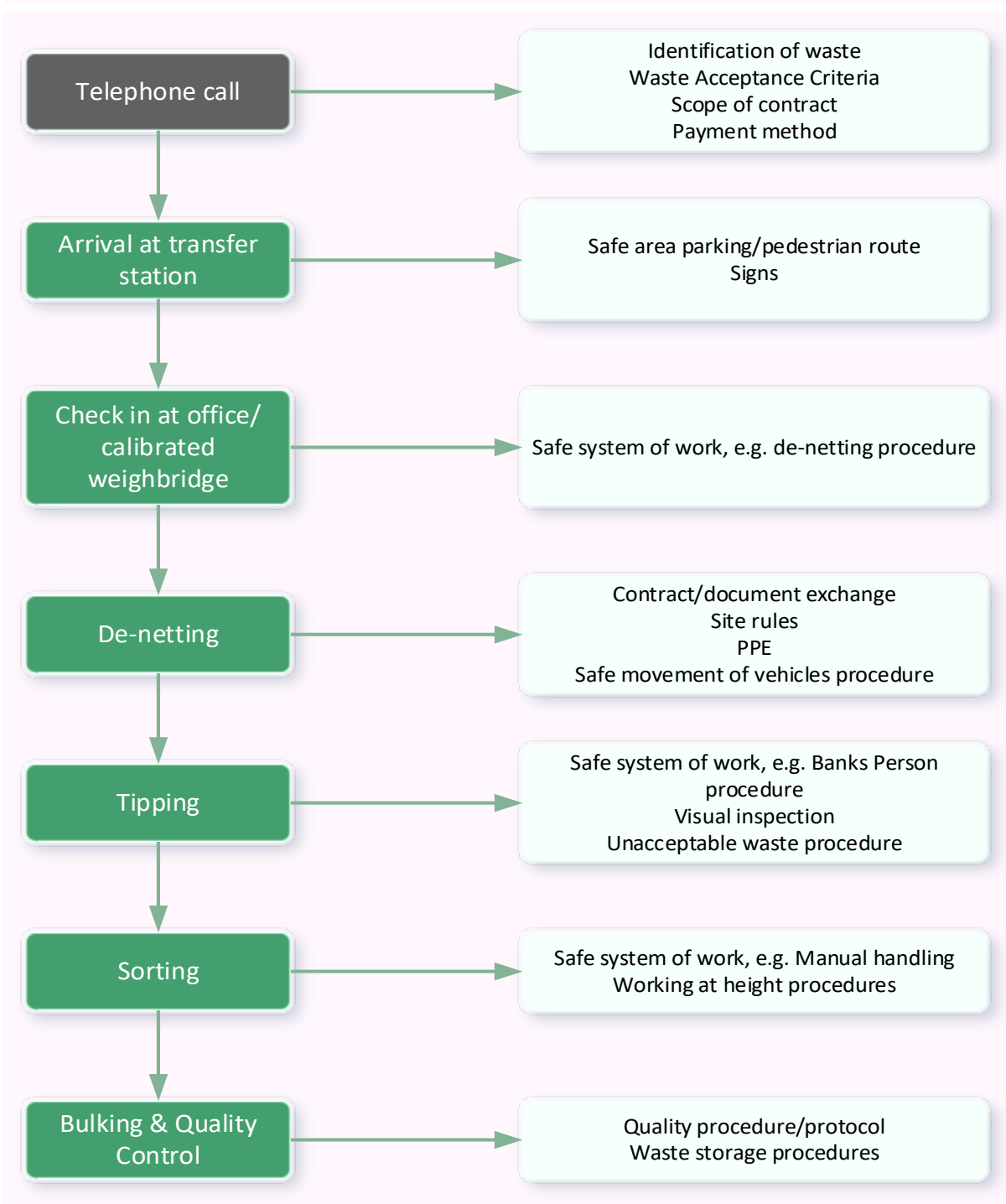
"At XYZ we monitor all wastes accepted onto site throughout a working day using a weighbridge. The weighbridge officer has been given sufficient training to fully understand how to code waste and what the legal requirements are whilst accepting waste on site.

At the end of each day the Yard Manager updates the documented inventory of the waste held on site. The quantity of waste accepted during the next day is monitored and this information is used together with previously agreed contracts (amounts) to ensure that XYZ's operations do not exceed the thresholds laid out in our permit.

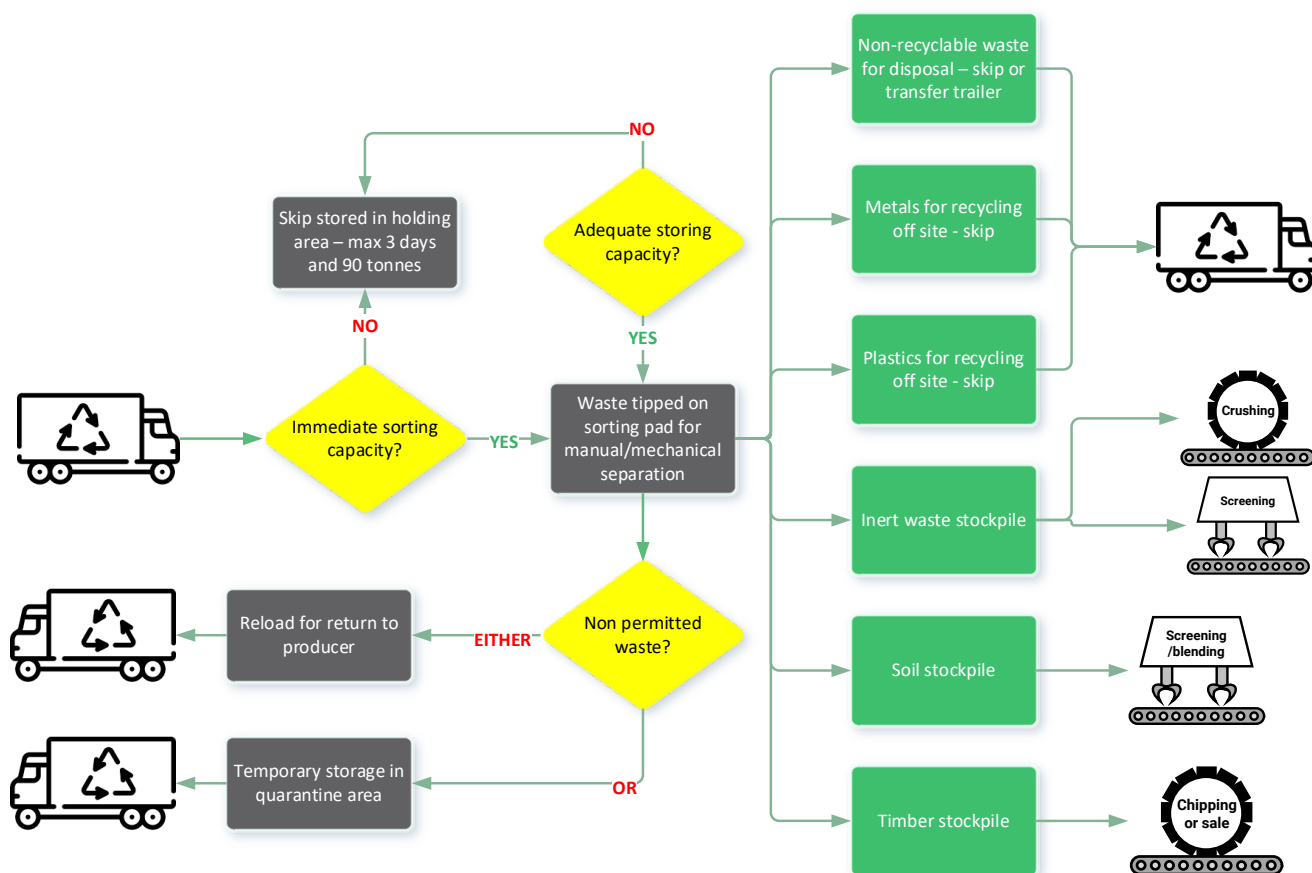
Records are maintained of all anticipated contractual amounts due to be received and the remaining capacity of the site on any one given day. This information is checked before any new contracts or arrangements are made with new or existing clients.”

Example 7: Waste transfer station operations and control measures

Process Control example (a)



Process Control example (b)



Example

Use and maintenance of plant and machinery

Maintenance of plant and machinery is seen as a key area of site management under the Standard. The report can include summaries of maintenance schedules, the role of the Transport Manager, types of plant and vehicles and any carbon footprint information such as use of electronic vehicles or engine types.

During the audit, evidence of maintenance regimes may include daily plant and vehicle check sheets, contracts with external maintenance companies, calendars showing MOT due dates, weighbridge certificates or mileage logs.

The organization's O'Licence should also be provided.

Resource management

The organization must demonstrate that sufficient resources are in place to run the waste activities efficiently. This includes consideration that the right resources are allocated in all activity areas to ensure compliance and effective daily operation of the business. This may

relate to training and competence of staff, capital expenditure for Personal Protective Equipment (PPE) or monitoring and calibration equipment.

A critical factor may be the time allowance for staff managing health, safety, quality or environmental compliance. How does top management respond when the business is unusually busy but compliance work still needs to continue? Describing how compliance can be prioritised is an important factor in resource management for this Standard.

To maintain control of operational resources, what measures are in place? For example, have top management allocated appropriate roles, responsibilities and resources to tasks such as the quarterly returns submission to the authorities, or calculating annual data for this Standard?

Other resource considerations may include:

- Allocation of a training and capital expenditure budget
- Keeping staff up to date with legislative changes
- Conducting regular appraisals & reviewing staff performance against set key indicators that include health, safety, quality and the environment
- Ensuring that staff are aware of who is responsible for the different areas/activities and the correct lines of communication, e.g. using organization charts
- Expectations that there will be sufficient operational meetings for good communication
- Time for operational staff to carry out daily check procedures - eg tank capacities

Section 8 Relevant documentation

16 Operational Procedures/Safe Systems of Work
17 Site Plans and Working Plans
18 Organizational structure charts
19 Training and capital expenditure budgets
20 Health safety, environmental and quality budgets
21 Monitoring data
22 Permit requirements
23 O'Licence

9 Competence

Why competence is important

The Standard requires a clear description of how the organization assesses, reviews, maintains and records staff competence because it is critical to the standard of service the organization can provide.

How to approach competence

In the report the process for connecting staff roles with the required competencies should be summarised. This can be in a table format or a written description. This section lends itself to a more visual approach; certificates (e.g. WAMITAB) can be screen shot and included as images and toolbox talk schedules can be simplified and pasted in. Images should not cover too many pages, they should serve as examples to liven up the report.

A full list of competencies should be included, such as WAMITAB qualifications in detail, the O'Licence, and any other relevant information. There is no requirement to name individual staff members (confidentiality is very important); instead make reference to staff roles.

During the audit it is essential to provide evidence of all the training records and staff qualifications listed in the report, to prove the organization has suitably qualified staff undertaking the roles allocated to them.

Provide evidence that the training programmes are suitable and adequate for demonstrating to regulators, the general public, staff and clients that reasonable steps have been taken to ensure all environmental, health, safety and quality requirements are addressed.

Awareness, knowledge, understanding and competence may be obtained or improved through training, education or work experience. Management should determine the level of experience, competence and training necessary to ensure the capability of personnel. Ensure that staff are made aware of their responsibilities and how this has a positive/negative effect on waste management performance. This may be done through toolbox talks, work instructions, or more formalised training.

The following evidence can be included in the audit:

- Job descriptions for key roles and responsibilities
- A skills matrix recording the minimum skills required for each role
- A training schedule to fill priority gaps in the skills matrix
- Induction training, a review of performance during probationary periods to ensure that staff competencies are verified
- Regular appraisals and observation
- Copies of training records and qualifications

Example 8: How a waste company may describe competency and training

“XYZ employs eight people which includes one operations manager, two collection drivers, two administrators working in the office providing administration and finance support and three site operators carrying out the sorting and disposal of waste at the transfer station and recycling facility. During this year we had one new starter.

As these roles are all very different, it was decided to establish the training needs for each individual separately. To do this, top management analysed each of the roles and developed a training matrix highlighting the training needs for each individual and colour coding their current status e.g. training complete, on-going or not started.”

Example 9: Developing a Training Matrix to fill in skill gaps

Table 9.1 – Training Matrix

Name	General Induction	WAMITAB	NEBOSH	CITB	Driver Induction (2 weeks mentoring)	First Aid	Sage
Operations Manager	Date of training						
Driver 1							
Driver 2						Due this year	
Office 1							Overdue
Office 2							
Recycling 1							
Recycling 2							
Recycling 3	Due next week						

Example

Section 9 Relevant documentation

24 Job description
25 Training records and copies of staff qualifications
26 Training matrix/skills matrix
27 Staff appraisal records

10 Corrective actions, preventive actions and improvement actions

What is the difference between these actions?

A corrective action is the elimination of the cause of a detected problem whereas a preventive action is the elimination of the cause of a potential problem. An improvement action may arise from audit findings, positive staff suggestions or a root cause from a site incident investigation.

How to evidence these actions

- Improvement plans from the findings of the baseline assessment
- A procedure for dealing with non-conformities or incident reporting and for taking corrective and preventive action
- A system for reporting actual or potential problems which demonstrates that staff undertaking work activities can share their ideas
- Root cause investigation documents detailing how issues could be eliminated in the future
- Indicators that track and review the effectiveness of improvement actions
- Communication (e.g. emails) of procedural changes to staff
- Internal assessment/audit reports with improvement actions
- An action tracker of some form
- A review of actions to check timely close-outs and identify trends

Example 10: How a waste company may describe incident response

'XYZ collects waste as part of the service we offer but also allows third parties to tip at our site. Last week there was a collision between one of XYZ's skip lorries and a third-party lorry that had never used the site before.

We focused on ensuring that both drivers were not injured before talking to relevant staff about what happened, reviewing site video footage and inspecting the damage to the vehicles.

We followed our procedure for incident response by holding a meeting with the operations manager and other staff. It was determined that the root cause of the collision was that the lorry from the third-party company was travelling too fast around the bend on the entrance/exit to the site. To eliminate this problem, we have introduced a 5 mph speed limit on site as well as a one-way system in order to separate those entering and those leaving the site (see example Corrective Action request Form below).

Our findings were documented in the root cause investigation form. Actions were prioritised in our site action tracker. This tracker is used daily by staff to capture any corrective, preventive or improvement actions. We list which members of staff will carry out which actions and by when."

Example 11: Incident Tracking

Table 10.1 – Incident Log

Incident	Description	Corrective
RI/2025/01	Frozen ice on site yard leading to slip.	Salting applied.
RI/2025/02	Suspected asbestos board discovered in tipped load.	Material quarantined. Regulator advised. Detailed investigation confirmed material was non-asbestos.
RI/2025/03	Skip sheeting blown off in gale.	Improved tied down method agreed and amendment to site rules.
RI/2025/04	Suspected bonded asbestos discovered in tipped load.	Material quarantined. Regulator advised. Detailed investigation confirmed material was small sheet of chrysotile asbestos cement from a roofing repair. Producer warned. Revised asbestos identification chart issued to staff.
RI/2025/05	Operator not wearing hi-vis in yard.	Verbal warning issued.
RI/2025/06	Client driver twisted ankle when jumping from cab.	Contacted employer and advised of injury and requested that drivers be instructed to climb from cabs. Entry made in accident book.
RI/2025/07	Lifting lug on skip found to be showing stress fracture.	Contacted skip owners and advised of matter and assisted in emptying and welding repair to lug. Issued work instruction that all skip lugs be inspected visually upon delivery and check point added to site housekeeping checklist.
RI/2025/08	Paint tin (solvent based) found in tipped waste.	Quarantined tin and advised producer and EA.
RI/2025/09	Suspected theft of copper from non-ferrous skip.	CCTV record checked and showed no loss of material in previous 24 hours, staff member who reported loss was unaware skip had been changed by merchant 2 days previously.
RI/2025/10	Minor cut to hand on steel can.	Canteen can opener replaced with better design. Entry in accident book.
RI/2025/11	Mobile phone charger overheated causing smoke in canteen.	Item was replaced as faulty by supplier. Checked PAT test records and item passed when last tested.
RI/2025/12	Hammerite tin (solvent based) found in tipped waste.	Quarantined tin and advised producer and EA.
RI/2025/13	Site safety helmet found to be cracked.	Checked all PPE and issued revised instruction on care and use of PPE to staff.
RI/2025/14	Dust in eye due to unexpected gust of wind.	Reinforced training on eye protection to employees. Entry in accident book.
RI/2025/15	Minor oil leakage from client lorry in yard.	Effectuated clean up and checking of interceptor, none found.
RI/2025/16	Ice on lorry base falls when tipping in shed.	Staff advised to stand well clear of lorries when tipping in cold weather.

Example

Example 12: Corrective action request form

Table 10.2 – XYZ Corrective Action Request Form

Details of Non-Conformance	Corrective Action(s) to be taken	Preventive Measures taken to avoid recurrence
Collision between two vehicles on entrance/ exit to the site. It was determined that the skip lorry from ABC Company was travelling at excess of 30 mph and could not stop in time	Introduction of a 5 mph speed limit on site and placement of speed limit signs 20 yards before entrance to the site	Introduction of a one way system on site in order to separate vehicles entering and exiting the site

Example

What does management of legal and other requirements cover?

Organizations using the Standard need to provide evidence that there is a system in place to gain information on the latest legislation for health, safety and the environment, and any guidance relating to quality standards.

Audit evidence may include a legal register or maintenance of appropriate data and documentation, e.g. Duty of Care documentation, RIDDOR reports (Form F2508), MOT Certificates etc.

Other requirements may include Industry Codes of Practice, Resource Frameworks such as those for composting or the production of aggregates and voluntary externally accredited management systems such as ISO standards.

What evidence could be provided?

- Review of findings from the baseline assessment; what legal and other requirements were identified e.g. Health and Safety, Environmental, Transport, Financial etc.
- Memberships of any appropriate trade organizations, business support networks or chartered institutions
- Use of websites and email notifications from authorities such as the regulators in each of the four nations
- Any relevant site procedures and proof they are being followed
- Regular operational compliance checks (such as internal audits)
- Identification of any opportunities for improvement in compliance
- Evidence that management of change procedures are in place for consideration of compliance when the organization starts a new project, activity or service
- Does a business review of legal implications include environmental, health, safety and quality concerns?
- A legal register that identifies applicable legal requirements and site responses for compliance

Example 13: How a waste company may describe compliance management

"To check XYZ is meeting its legislative requirements, the operations manager developed a legal compliance checklist. Competent site staff carry out a monthly site inspection using the checklist to ensure legal and other requirements are up to date and are being met, for example is waste segregated and quarantined appropriately in line with permit conditions? Is housekeeping in order? Is noise and odour within the prescribed levels? Are employees wearing appropriate PPE?

Not only does the checklist help to maintain site compliance but it has also improved the overall efficiency of the site and the relationship the company has with its neighbours and regulators.

Table 10.3 – Compliance Checks

Legal Compliance and Site Practice	OK/OBS/NC	Comments
Are all wastes stored in accordance with the conditions of the environmental permit?	OK	Quarterly Returns show less than 75,000 tonnes passed through site in calendar year.
Is waste sufficiently contained and controlled for transport from the site?	NC	Witnessed Driver 1 transporting waste off site without a net in place.
Are copies of waste transfer notes and hazardous waste consignment notes available for the last 2 and 3 years respectively for all wastes?	OK	All records held in weighbridge office

Example

Section 10 Relevant documentation

28 Non-conformance, corrective and preventive action procedure
29 Accident and incident reporting procedure
30 Accident books
31 Audit documentation
32 Customer/client complaints
33 Regulator correspondence
34 Legal and other requirements procedure
35 Legal checklists
36 Legislation and other requirements register
37 Environmental Permits and Exemptions
38 Monitoring data
39 Risk assessments and operational controls

11 Performance review

Why the performance review is vital

- To enable accurate verification of all materials that enter the site(s) within the scope of this report, and their ultimate destinations
- To review landfill diversion rates as an indicator of performance
- To review material recovery rates as an indicator of performance
- To establish full traceability of material transferred from the site for recovery and disposal, end-of-waste or similar

How to conduct a performance review

Record all waste that has entered and left the site for a period of 12 months of the organization's PAS 402 reporting year, which must coincide with the dates of the quarterly returns submitted to the regulator. The Green Compass Scheme and the approved Inspection Body have agreed that the company's chosen consecutive quarters need not be restricted to a single calendar year but may, for example, include the last two quarters from Year 1 and the first two quarters from Year 2. It is understood that if the organization is operating under exemptions only, quarterly returns are not required. In this instance, align the data with the quarters as if there were quarterly returns in place.

Once the quarterly returns data has been internally verified for the chosen 12 months summary statistics can be calculated using the instructions in Section 12 of the Standard.

Table 1 – Performance summary

Performance summary	Total tonnes
Total material inputs this period	
Waste used/retained on site this period e.g. for engineering purposes	
Waste remaining on site at end of this period (unprocessed)	
Waste remaining on site at end of this period (processed)	
Total waste remaining on site at end of this period	
Waste sent offsite for reuse/repair this period	
Waste sent offsite for recycling this period	
Waste sent offsite for energy recovery this period	
Qualifying fines	
Non-qualifying fines	
Materials sent offsite as non-waste this period e.g. end of waste	
Waste sent off for disposal (incineration without energy recovery)	
Waste sent off for disposal to landfill	
Total materials sent off site this period	
<i>NOTE 2 Waste sent offsite for other recovery includes landspreading and biogenic wastes that do not meet composting standards.</i>	
<i>NOTE 3 'Period', in Table 1, refers to the reporting period (annual).</i>	

NOTE 4 Attention is drawn to The Landfill Tax (Qualifying Material) Order 2011 (SI 2011 No 1017) [6]; and The Landfill Tax (Qualifying Fines) Order 2015 [7].

One of the aims is to be able to confidently complete Table 1 from Section 11.2 of the Standard, using it as a template:

Completing Table 2 of Section 11.2 of the Standard

The most important piece of work is to match up the incoming waste streams with the outgoing waste streams using knowledge of the organization's average skip contents. For example, across the year incoming mixed skips will most likely average out for the percentages of wood, metal, plastics etc. that they contain. These percentages can be applied to the data to work out how much incoming material there is for each outgoing waste stream.

Focus on each outgoing stream with its individual waste code. Rows of outgoing waste streams must never have more than one outgoing waste code. Each row of the main data table (Table 2 in Section 11.2 of the Standard) must be dedicated to one outgoing waste code with its specific destination treatment description.

Outgoing waste stream tonnages are fixed on the weighbridge and must never be altered in the performance data. However, incoming tonnages of different waste streams in mixed skips are unknown until the PAS 402 calculation process makes it clear how much must have been coming in to create the outgoing tonnages. For this reason, it is essential not to focus on incoming tonnages. It is the outgoing tonnages that tell the most accurate story.

Stockpiles, materials left on site for engineering purposes and any materials going to end-of-waste must all be included in the calculations to ensure the full picture of waste performance can be assessed. This is why Table 1 is so important – the list here should be meaningful to the organization and guide the type of analysis run on the weighbridge software. Some of this data may not have been required for the quarterly returns submissions and will need adding to the PAS 402 calculations.

It is important to understand the recovery and disposal (R&D) codes which come from the Waste Framework Directive (adopted and adapted by the UK after leaving the EU). The R&D codes must be correct in the quarterly returns and in the weighbridge software. Sometimes they can help separate out the difference in outgoing waste streams when the EWC or LoW codes remain the same.

For example, wood 19 12 07 for use as biomass fuel cannot be put on the same row as wood 19 12 07 going off site to be used in panel board production. A separate row must be produced clearly showing the different tonnages sent for each use. The outgoing R&D code for biomass fuel would be R1 (use principally as a fuel or other means to generate energy) whilst the R&D code for panel board production would be R3 (recycling/reclamation of organic substances). The R&D codes do not go into Table 2 from the Standard, but they must be correct on the weighbridge software and if they are, summarising the data will be easier.

Record totals for each outgoing waste stream in the same format as Table 2. Include as much detail as possible in the 'destination treatment description' column, which provides an

opportunity to highlight the hard work put in to finding the best recovery options for waste streams. Confidential information should not be included.

Table 2 – Annual recovery and disposal tonnages

Incoming LOW/ EWC code(s) ^{A)} and description (multiple)	Incoming tonnage	Outgoing LOW/ EWC recovery/disposal code and description (1 only per row)	Outgoing tonnage	Waste stream	Destination treatment description
Example below:					
Wood 17 02 01	2	Wood 19 12 07	10	Wood	Use as biomass fuel
Mixed skips 17 09 04	8				

^{A)} The waste classification code, referred to as LoW (List of Waste) or EWC (European Waste Catalogue) code – refer to “*Technical Guidance WM3: Waste Classification – Guidance on the classification and assessment of waste*” [8] for more details. A non-UK or non-EU equivalent may also be used.

Completing Table 3 of Section 11.3 of the Standard

The waste hierarchy data calculations are set out in calculation 12.2.4 (percentage of material processed per waste hierarchy category). Having good knowledge of waste codes and R&D codes makes this section easier to complete. DEFRA guidance on applying the waste hierarchy is available online.

Data sources for the annual report

Annual report data must come from the original source data on the weighbridge software and nowhere else. Quarterly returns data should never be used as the raw data for the report. During the audit, the auditor will cross-reference figures from the weighbridge software, the quarterly returns, the annual report summary tables and any internal calculation spreadsheets used by the organization to calculate quarterly returns and the PAS 402 figures. If any of these do not match the calculations must be re-done until all the data is reconciled. This verification process is critical to passing the PAS 402 inspection.

A paragraph introducing the data tables may be useful, and provides an opportunity to explain anything unusual or anything that would benefit from being highlighted. An example is below:

Example 14: How a waste company may introduce the data section

“We have conducted our annual review of all waste entering and leaving site between 1 July 2025 and 30 June 2026. Based on raw weighbridge data and site records, the figures have been internally verified by knowledgeable staff and externally verified by the Green Compass

PAS 402 inspection body. After analysing this data it was determined that for 2025-26 the overall landfill diversion rate of the company was 92%.

XYZ produce aggregates for sale; all outgoing aggregates were weighed on the weighbridge. These figures are not required by the regulator because the materials met end-of-waste criteria, but have been added to the PAS 402 calculations in this report to show where all materials have gone off-site.”

Section 11 Relevant documentation

40 Management review procedure
41 Regulator Quarterly returns
42 Weighbridge tickets
43 Regulator correspondence
44 Improvement plans
45 Monitoring data

12 Index of Examples & Associated Tables

Example 1:	Scope of operations	13
Example 2:	Exclusions	15
Example 3:	Waste Company EYZ and their client The Building Firm	17
Example 4:	Risk Assessments	20
Example 5:	Business Continuity Plan.....	23
Example 6:	How a waste company may describe site capacity controls	25
Example 7:	Waste transfer station operations and control measures.....	27
Example 8:	How a waste company may describe competency and training	32
Example 9:	Developing a Training Matrix to fill in skill gaps.....	32
Example 10:	How a waste company may describe incident response	33
Example 11:	Incident Tracking	35
Example 12:	Corrective action request form.....	37
Example 13:	How a waste company may describe compliance management	39
Example 14:	How a waste company may introduce the data section.....	43

13 Relevant documents table

Section 2 Getting started	
1 Process map(s)	2 Integrated systems policies
Section 6 Client relationship	
3 Customer requirements procedure	4 Contract or agreements
5 Client Site Maps/plans	6 Customer satisfaction surveys
7 Resource Framework documentation	8 Client material specification requirements
Section 7 Impacts and risks	
9 Risk assessment procedure	10 Risk assessment register
11 Safe Systems of Work / Method Statements	12 Business Continuity Plan
13 Emergency Preparedness Procedure	14 Working Plan
15 Incident Plan/Emergency Plan	
Section 8 Operational management	
16 Operational procedures/Safe Systems of Work	17 Site Plans and Working Plans
18 Organizational structure charts	19 Training and capital expenditure budgets
20 Health safety, environmental and quality budgets	21 Monitoring data
22 Permit requirements	23 O'Licence
Section 9 Competence	
24 Job description	25 Training records and copies of staff qualifications
26 Training matrix/skills matrix	27 Staff appraisal records
10 Corrective actions, preventive actions and improvement actions	
28 Non-conformance, corrective and preventive action procedure	29 Accident and incident reporting procedure
30 Accident books	31 Audit documentation
32 Customer/client complaints	33 Regulator correspondence
34 Legal and other requirements procedure	35 Legal checklists
36 Legislation and other requirements register	37 Environmental Permits and Exemptions
38 Monitoring data	39 Risk assessments and operational controls
11 Performance review	
40 Management review procedure	41 Regulator Quarterly returns
42 Weighbridge tickets	43 Regulator correspondence
44 Improvement plans	45 Monitoring data