DONALD WARD LTD ANNUAL PAS 402 REPORT

1st January 2024- 31st December 2024

Produced in accordance with the PAS402: 2025 Standard

WARD

Contents

Figures

Tables

Appendices

1. Forward

Donald Ward Ltd (operating as Wards) is a leading provider of recycling and resource recovery solutions, with locations across England and Wales. We operate across various waste streams, predominantly ferrous and non-ferrous metal, trade, commercial recycling, textiles, and hazardous waste.

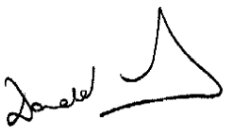
The company was founded in 1940 and is now managed by third and fourth generation family members who continue their commitment to developing waste management and recycling techniques and helping customers meet and exceed their recycling targets. The company has an annual turnover an excess of £140m, employs over 400 people and operates a fleet of over 100 vehicles.

The company supports the government's commitment to sustainability. The Ward Way is a road map to 2030 and our commitment to sustainability across four key, interconnected pillars: i) Environment, ii) Energy and Carbon, iii) Social Value and iv) Economy. These pillars are aligned with the UN Sustainable Development Goals which are the most material to the business. By 2030, Ward has pledged to eliminate its contribution to climate change with an interim science-based target to reduce emissions by 47%.

Wards pledge to divert waste to landfill as far as reasonably practicable, by re-processing waste so it falls within end-of-waste requirements or providing a second life through production of energy and closed loop recycling. Wards currently operate seven waste sites across England, however the only site to re-process waste is the site located at Crompton Road, Ilkeston.

This report highlights that this site achieved a landfill diversion rate of 94.81% in 2024 from 270, 096 tonnes of waste removed from site.

Signed:



Name: Donald Ward

Title: Director

Date: 28th November 2025

WARD

2. Scope of Report

Donald Ward Ltd operates several facilitates around England and Wales. This is shown in Figure 1. The scope of the report only covers the waste management and processing operations at the Crompton Road facility. Other waste management facilities under Donald Ward Ltd are excluded from this report.

This Annual Report is in line with the PAS 402:2025 specification to measure and demonstrate Crompton Road's waste management and recycling performance in 2024. The main performance indicators are set as the amount of waste recovered, diverted from, and sent to landfill. The report covers the period of the 1st of January - 31st of December 2024.

Figure 1- Location of Donald Ward Ltd Sites in England and Wales

3. Scope of Operations

3.1 Site Information

Ward Ltd Crompton Road is a waste treatment and transfer station located at Hallam Fields Road, Ilkeston, Derbyshire, DE7 4AZ (What3 Words ///kept.flown.tennis).

Figure 2 shows the location of Wards Crompton Roads and the surrounding area.

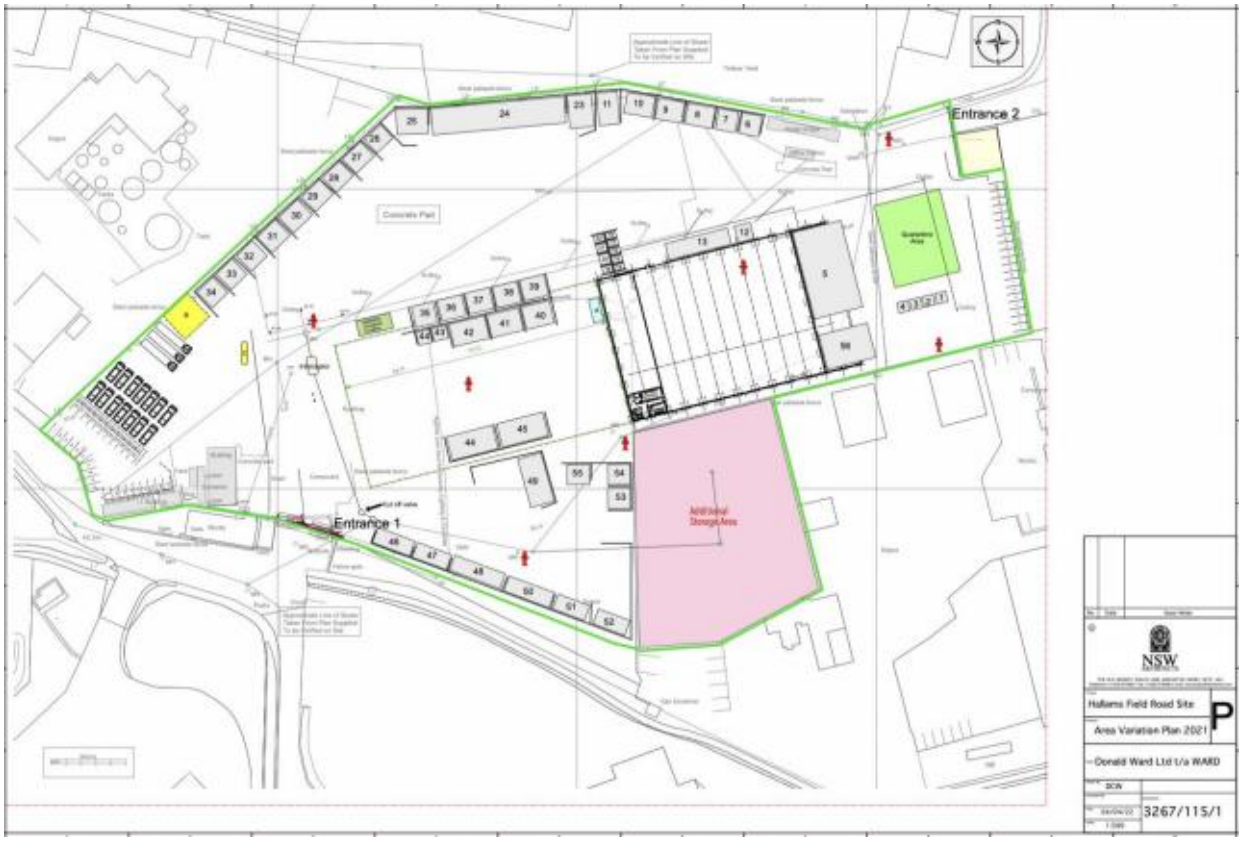


Figure 2- Site map of Wards Crompton Road

The total footprint of Ward Crompton Road is 9.727 acres. This includes the operational areas: Automotive Shredder Residue (ASR), Material Recovery Facility (MRF) and Solid Recovered Fuel (SRF). There are also two office buildings (ASR and transport), a weighbridge, product storage areas and parking for staff and waste trucks (skips, roll on roll offs).

Derbyshire County Council has granted planning permission for operation of waste processing at this current site. The planning permission defines the scope of the operations allowed at Wards Crompton Road, as well as stating the development and operating conditions. Details of the latest planning permission granted in 2020 is listed below in Table 1:

Planning Permission No.	CW8/0220/75
Applicant:	Donald Ward Ltd
Location:	Donald Ward Limited Recycling Facility, Quarry Hill Industrial Estate, Hallam Fields Road, Ilkeston.
Proposed Development:	Consolidation of historic planning permissions and continuation of waste recycling/waste processing to include extension to an existing recycling building, installation of new weighbridge, improved site layout, and retrospective use of second vehicular site access off Merlin Way/Crompton Road at the Donald Ward Limited Recycling Facility, Quarry Hill Industrial Estate, Hallam Fields Road, Ilkeston.

Table 1- Planning Permission for Ward Crompton Road

Wards Crompton Road also holds an Environmental Permit, which grants them to operate, store, process, and transfer waste. This was issued by the Environment Agency in 1997. This was re-issued to Donald Ward ltd in 2011 from Webster Bros and was last varied in October 2024. Permit details are listed below in Table 2:

Permit No.	EPR/WP3195VY
Permit Holder:	Donald Ward Ltd
Installation Name	Hallam Fields Road
Variation Application No.	EPR/WP3195VY/V003
Effective Date:	01/10/2024

Table 2- Ward Crompton Road Environmental Permit

3.2 Permitted Waste Operations

Wards Crompton Road is permitted to accept waste streams from various industries, including:

- Asbestos
- Automative
- Commercial
- Household
- Manufacturing

- Construction and Demolition

Ward Special Projects is a contracting division of Wards that also provides a range of services for the construction, demolition, and industrial sector.

Wards are committed to minimising the disposal of waste to landfill and aim to recycle and recover as much of the waste as possible, and for individual waste streams. The company has a fleet of further disposal sites which specialise in various recovery and recycling routes.

Wards Crompton Road waste transfer station is permitted to accept no more than 400,000 tonnes annually. The site is authorised to undertake the following operations (extracted from Schedule 1 of Environmental Permit EPR/ WP3195VY):

Operation	Capacity (tonnage) or conditions:
R03 and R05: Treatment consisting only of manual and mechanical sorting, separation, screening, crushing, shredding, milling, sink-float separation, compaction, baling, and flame cutting of non-hazardous waste for disposal.	No more than 50 tonnes per day or recovery
R04: Treatment in shredders of metal waste, including WEEE and waste motor vehicles and their components for recovery	No more than 50 tonnes per day.
R13: Storage of uncontaminated ferrous and non-ferrous metals. Storage of lead acid batteries.	Uncontaminated ferrous metal wastes or alloys and uncontaminated non-ferrous metal wastes shall be stored on hard standing or an impermeable surface. Recovery of Lead Acid batteries: There shall be no treatment of lead acid batteries. Lead acid batteries shall be stored in impermeable containers with an acid-resistant base and with a lid, unless stored under a weatherproof covering. Other batteries shall be segregated based on type and chemistry and stored in suitable containers or weatherproof coverings.
D09: Treatment of non-hazardous waste	No more than 50 tonnes per day of non-hazardous waste to be treated at the site.
D15: Storage of refrigerants	Except for refrigerators awaiting manual sorting or manual dismantling, only storage capacity of refrigeration units shall not exceed 50 tonnes at any one time.

Table 3- Ward Crompton Road Operations and Capacity.

Wards Crompton Road does not hold any exempt operations.

3.3 Waste Processing and Disposal.

To facilitate the recycling and recovery of materials from incoming waste streams, Ward Recycling has invested in advanced plant and processes aimed at reducing the volume of waste sent to landfill and supporting the circular economy within the waste management sector. Figure 3 illustrates the on-site waste acceptance process and the systems in place to promote effective segregation.

Ward Recycling is committed to due diligence in delivering high-quality products to its customers by a thorough segregation and minimising cross contamination of wastes, including significant investment in state of the art plant and machinery to segregate waste as far as reasonable practicable to ensure material is sent for the correct disposal route and minimise finite materials going for disposal. Including:

- Implementation of a Automated Shredder Residue (ASR) Plant that processes material from shredded End of Life Vehicles to segregate ferrous and non-ferrous metals and non-metal materials. Metals are then hauled to an approved contractor for re-processing.

- Installation of a Materials Recovery Facility (MRF) which sorts and segregates construction, demolition and household waste into different waste streams. Any non-recyclable fractions are baled and hauled to an energy from waste site.

- Use of a Solid Recovered Fuel (SRF) plant to shred, sort and segregate waste from bulky household, commercial and industrial wastes into recoverable waste streams. Light fraction is baled and sent for energy recovery in Sweden.

  - The MRF and SRF remove high chloride waste streams (e.g. PVC) using optical sorting technology, which improves the quality of final fraction products.
- Inert and dense materials are segregated from the SRF and MRF waste streams using air density separators to improve the calorific value of fraction materials.

Wards also adhere to the Duty of Care Regulations to ensure that waste is directed to an approved contractor for proper disposal or recovery.

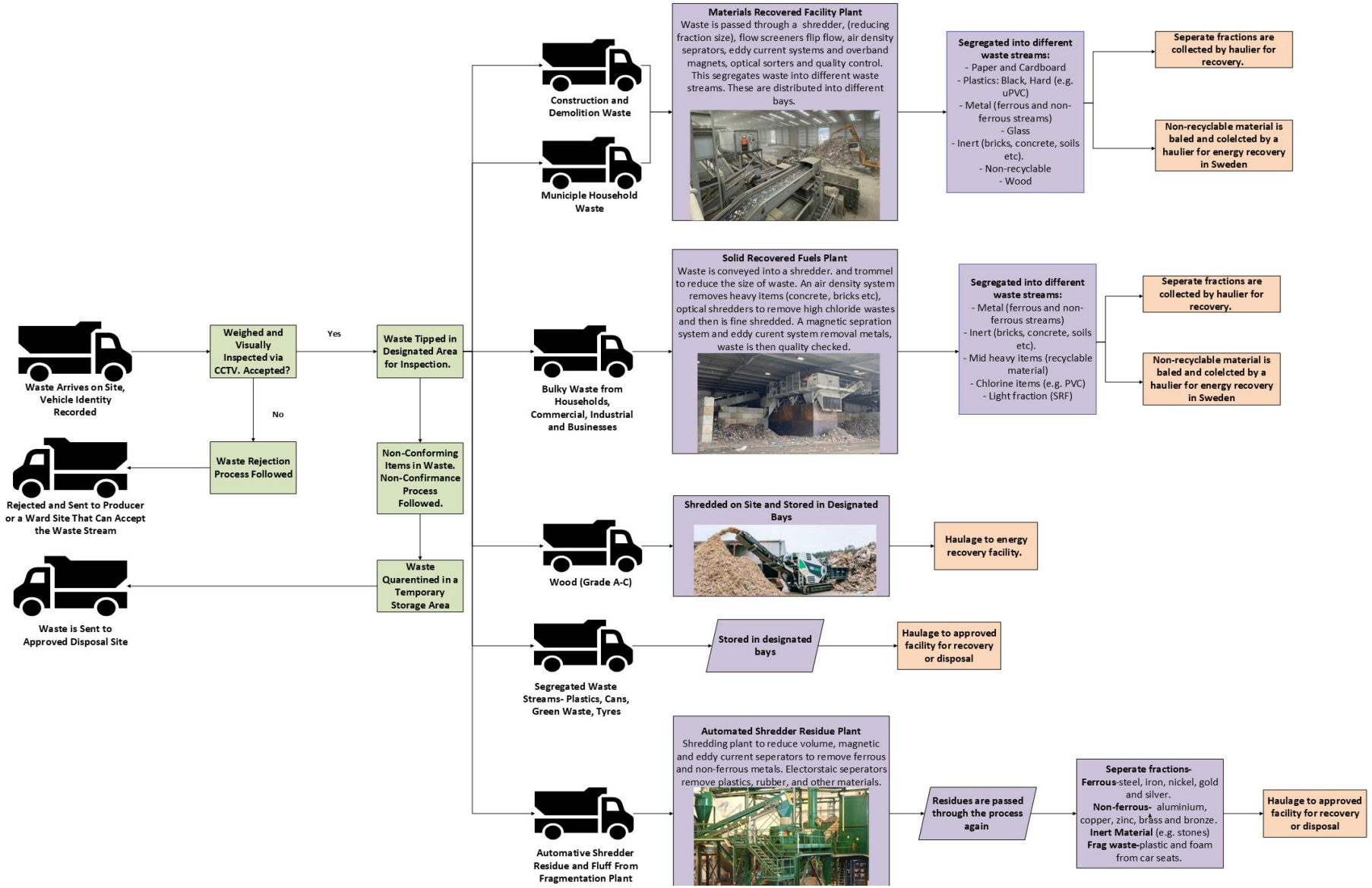


Figure 3- Waste Management Process at Wards Crompton Road

3.4 Certifications and memberships

Wards Crompton Road is certified in the following accreditations:

- ISO 9001: 2015 Quality
- ISO 14001:2015 - Environmental Management Systems
- ISO 45001: 2018 - Safety
- Construction Online- Gold Standard
- Ecovadis Certified- Bronze
- Considerate Constructors Audit- Excellent in 2023.

Wards are also accredited in the following schemes:

- Asbestos Removal Contractor's Association (ARCA)
- Bureau of International Recycling (BIR)
- British Metal Recycling Association (BMRA)
- Chartered Institute of Waste Management (CIWM)
- Construction, Logistics and Community Safety (CLOCS) champion member
- East Midlands Chambers Member
- SmartWaste
- Member of National Federation of Demolition Contractors

4. Client Relationship

4.1 Customer Services

Wards are committed to ensuring we meet client requirements, whilst maintaining compliance with legal requirements and our environmental permits. Donald Ward Ltd have two entities for waste enquiries:

- Customer Services: aids with general enquiries, feedback and booking of skips.
- Waste specific teams- hazardous, ferrous and non-ferrous and special projects.

When new personnel commence their role in the customer services teams, they undertake the Wards site induction which consists of the company details and a basic overview of staff requirements (e.g. health, safety, environmental and other legal requirements). A full training programme is provided to new employees in customer services on the enquiries and booking process and ensuring that customer requirements are met.

4.2 Waste Producer Process

The Ward Recycling website (www.ward.com) includes details of the waste services and facilities available, as well as contact information for waste enquiries- including phone numbers and specific quote forms. A generic contact phone number is also available, which provides options that personnel can choose from that will direct them to the correct department. This enables personnel to correctly discuss queries and requests with the appropriate team.

When the customer completes the quote form, this provides the relevant team with initial details of the waste stream, contact information and their requirements. To ensure that Wards can deliver the correct service for the customer, direct contact is made via telephone to discuss the customers' requirements.

As part of the onboarding process for customer services, a set of prompt questions covering customer requirements and waste classification is asked to the customer, this is provided to staff during training. For some waste streams, additional information such as Safety Data Sheets and analysis may be required to ensure that waste is correctly classified.

For multiple waste streams, Wards can provide a site audit. Members of the relevant department can undertake inspections of waste streams and provide guidance and segregation advice to ensure that waste is commercially and environmentally beneficial.

Once is information is collated, a collection is arranged through the customer services or relevant department. When the collection is confirmed, customers are informed about the types of waste permitted in their chosen waste stream. They are also directed to the Ward website, which provides additional guidance on proper waste segregation for the accepted waste streams.

The collection is entered onto ENWIS- a software which logs customer services and sales data, waste documentation and weighbridge data

All customer communications are recorded on their accounts, including emails, quotes, and collection details. Customers who hold accounts are provided with access to the Ward Portal, where they can also view site-specific details, documentation such as job tickets and collection photos, as well as recycling statistics including recovery and disposal percentages and graphs. An additional feature highlights on the customer portal is that the CO2 from the waste generated and the transportation of the waste .Each order also includes a tree calculator that estimates the number of trees required to offset the CO2 generated. An example is shown in Figure 4 below.

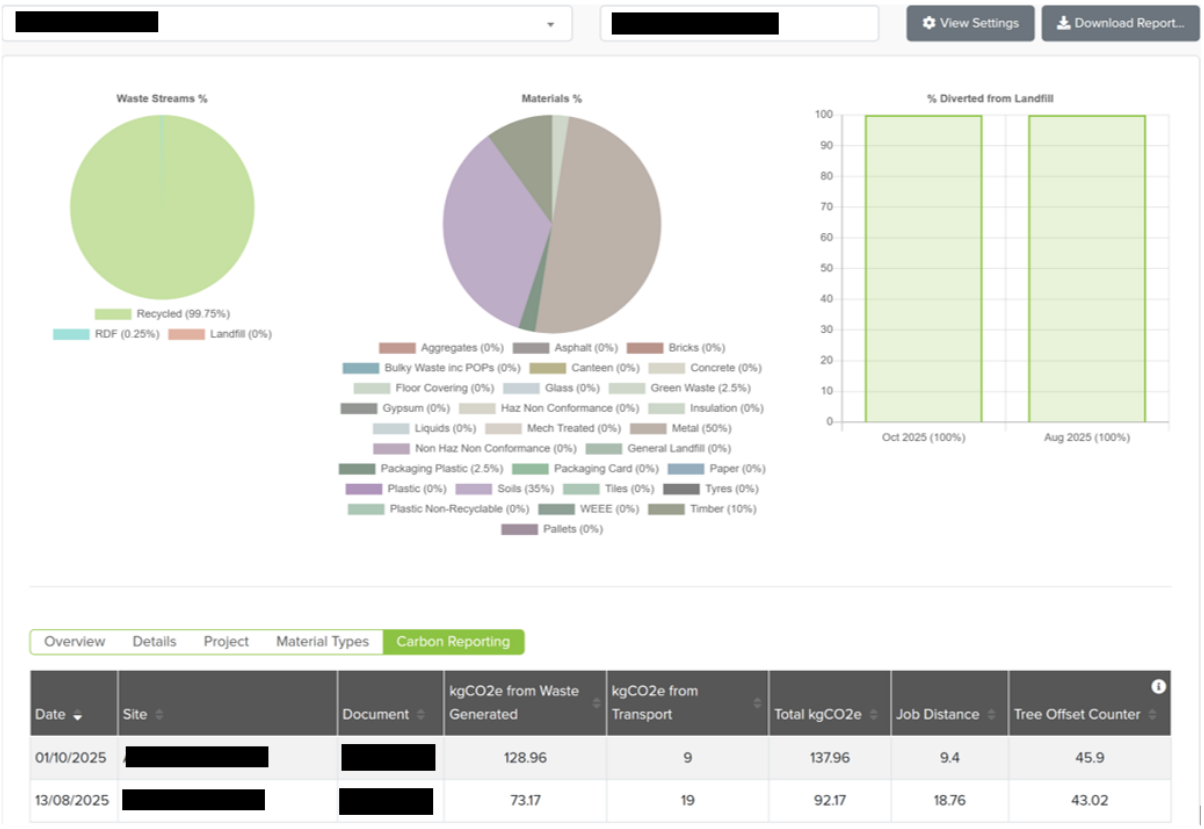


Figure 4- CO2 Calculator and Tree Offset Counter on Wards Customer Portal

Customer feedback and complaints are logged on WARD Feedback Register and Claims Log for tracking and investigation. Complaints and feedback related to Health, Safety, Quality and Environmental is escalated to the HSEQ team for recording on the My Compliance Non-Conformance Reports module for investigation and follow up actions to be implemented. My Compliance is a software used by the business to manage compliance requirements and training distribution.

Legal documentation (including waste transfer documentation), weighbridge tickets and acceptance photos are stored on Enwis and SharePoint. If there are any non-conformances or waste is rejected from site, this is logged on Enwis and the account manager is notified so they can escalate it to the customer.

4.3 Outgoing Wastes and Materials

For outgoing waste from site, there are designated teams for different waste streams- including hazardous, ferrous and non-ferrous and commercial waste. They liaise with approved contractors and third parties to ensure that the appropriate materials can be accepted by their sites.

For waste being transferred to other sites for disposal or recovery, if it is not a Wards site, a site visit is undertaken to ensure that the site can accept the waste and is compliant with Duty of Care. Once an account is in place, a collection is scheduled via the relevant team and a loading plan issued.

If materials meet end of waste criteria, sampling and inspection of wastes is undertaken prior to materials leaving site in line with the End of Waste Regulations. Paperwork is provided to the haulier at the time of collection, including PRN's (Packaging Recycling Notes), Statements of Conformity, non-radioactivity certificates, QMS certificates, photographs and weighbridge tickets. If waste or materials are exported, Annex VII documentation is also provided and PERNs (Packaging Export Recycling Notes). Wards Crompton Road currently does not store materials that fall under the End of Waste Regulations.

5. Impact and risks

5.1 HSEQ Team

At Wards, there is a designated Health, Safety, Environment and Quality Team (HSEQ) team to ensure the company maintains compliance with permit requirements and legislation, as well as identifying and managing risks. The HSEQ team is led by Donald Ward, with support from the Health, Safety and Quality Control Manager, Sustainability and Asbestos Manager and Environmental Advisor. They undertake regular meetings and inspections of Ward sites to assess the status of compliance for sites, as well as providing advice on operation, management of waste and emergent queries from sites and their stakeholders.
Wards Crompton Road are managed and monitored by WAMITAB COTC qualified staff to ensure the site operation in compliance with the requirements of the Environmental Permits. Further details are highlighted in Section 7- Competence.

5.2 Management Systems

Wards HSEQ team are responsible for maintaining Ward Crompton Roads management systems for safety, quality and environment. This consists of Internal Management Systems (IMS) for health, safety, quality and environment- these systems provide a framework for ensuring effective operations, managing risks, and achieving organizational goals through structured processes, policies, and procedures.

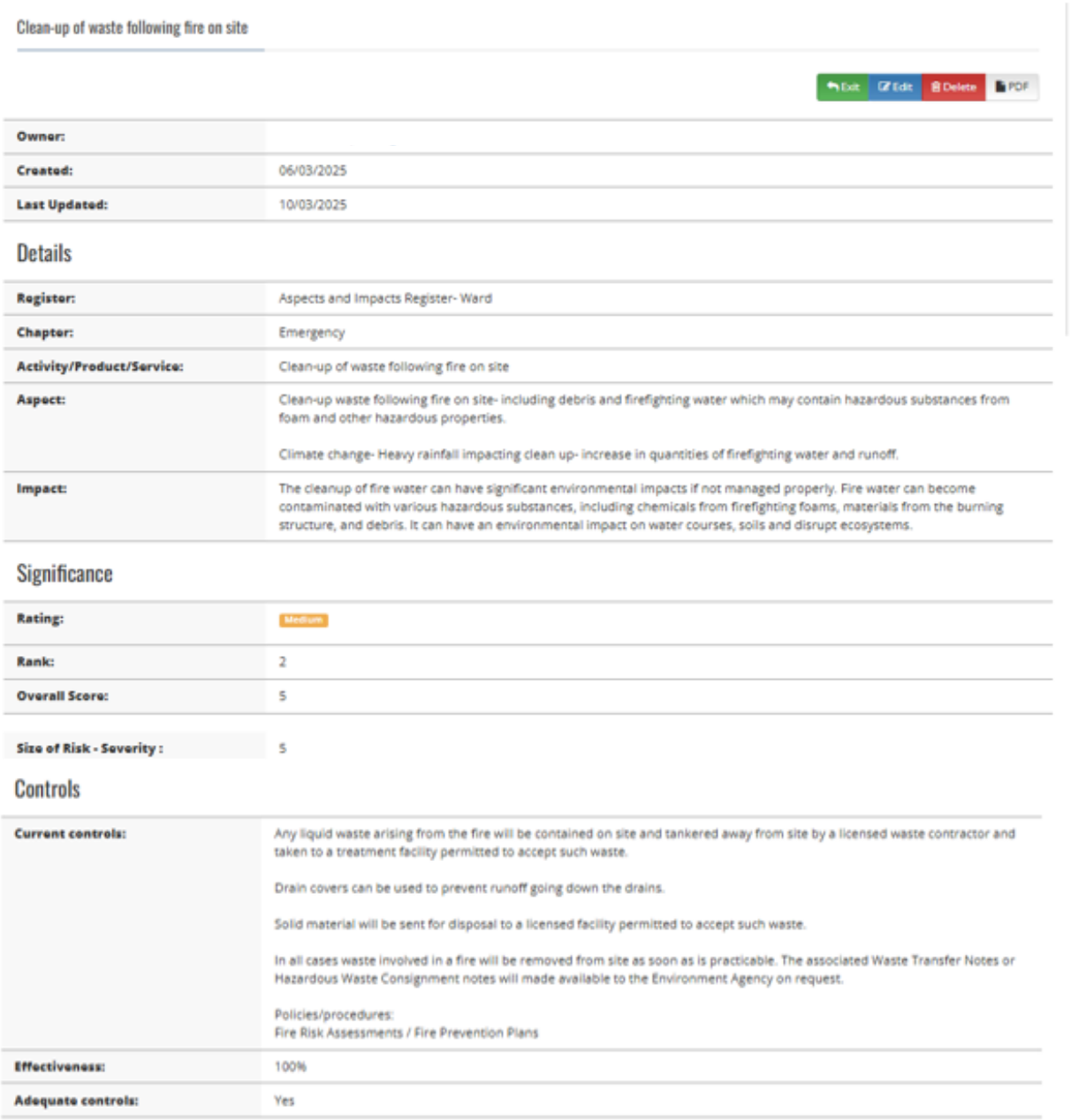
Wards Crompton Road is accredited to ISO 9001: 2015, ISO 14001:2015 and ISO 45001:2018. These are subject to annual surveillance and 3 yearly re-certification audits by ISOQAR. All accreditations expire on the 10th of February 2027.

5.3 Risk Management

The HSEQ team works with site managers and other teams to identify health, safety and environmental risks associated with operational activities and processes and collate them into risk assessments. All risk assessments are logged on the SharePoint company server and are reviewed periodically or when required by competent personnel- once authorised these are briefed to personnel.

Control measures highlighted in risk assessments are also included in Standard Operating Procedures (SOP's)- these document the arrangements of specific activities and the safety controls that must be followed. These procedures are briefed to competent personnel who will be undertaking the activities- declarations are logged on My Compliance under the individual training record.

My Compliance is also used for logging aspects of site operations and the potential safety and environmental impacts and scored based on severity. Control measures in place to mitigate the impact are also referenced to indicate continual improvement. An example of an aspect on My Compliance is shown in Figure 3 below.



Clean-up of waste following fire on site

Exit | Edit | Delete | PDF

Owner:	
Created:	06/03/2025
Last Updated:	10/03/2025

Details

Register:	Aspects and Impacts Register- Ward
Chapter:	Emergency
Activity/Product/Service:	Clean-up of waste following fire on site
Aspect:	Clean-up waste following fire on site- including debris and firefighting water which may contain hazardous substances from foam and other hazardous properties. Climate change- Heavy rainfall impacting clean up- increase in quantities of firefighting water and runoff.
Impact:	The cleanup of fire water can have significant environmental impacts if not managed properly. Fire water can become contaminated with various hazardous substances, including chemicals from firefighting foams, materials from the burning structure, and debris. It can have an environmental impact on water courses, soils and disrupt ecosystems.

Significance

Rating:	Medium
Rank:	2
Overall Score:	5
Size of Risk - Severity :	5

Controls

Current controls:	Any liquid waste arising from the fire will be contained on site and tankered away from site by a licensed waste contractor and taken to a treatment facility permitted to accept such waste. Drain covers can be used to prevent runoff going down the drains. Solid material will be sent for disposal to a licensed facility permitted to accept such waste. In all cases waste involved in a fire will be removed from site as soon as is practicable. The associated Waste Transfer Notes or Hazardous Waste Consignment notes will made available to the Environment Agency on request. Policies/procedures: Fire Risk Assessments / Fire Prevention Plans
Effectiveness:	100%
Adequate controls:	Yes

Figure 5- Example of Aspect on My Compliance

Both risk assessments and aspects and impacts registers include the potential risks associated with climate change. The main risks to operations include increased periods of heavy rainfall, prolonged periods of drought and the increase in frequency and severity of storms.

5.4 Staff Welfare

Ward is committed to a comprehensive risk management approach that prioritizes the health, safety, and welfare of all personnel. Recognizing the potential hazards inherent in operational activities, we have established a range of preventative and mitigation measures to ensure that the workforce is not exposed to undue risk. These measures, aligned with industry best practices, include:

- **Health Surveillance and Risk Assessment**: Annual health surveillance is carried out for all personnel working in operational areas and around plant equipment. This surveillance is designed to identify early indicators of work-related health risks and supports proactive management of employee well-being.
- **Welfare and Support Facilities**: A full suite of welfare facilities is available across all work zones, ensuring that all personnel have access to adequate rest areas, sanitary facilities, and hydration stations, reducing the potential risks associated with fatigue and poor working conditions.
- **Controlled Environment in Cabins and Picking Lines**: For personnel working in enclosed cabins or along picking lines, environmental controls such as heating, air conditioning, and dust suppression systems are in place. These systems help mitigate the risks of temperature extremes, airborne particles, and poor air quality, which could otherwise affect health and performance.
- **Personal Protective Equipment (PPE)**: Risk assessments are regularly reviewed to determine the most appropriate PPE for each role. All personnel are equipped with the necessary protective gear, including gloves, masks, eyewear, and hearing protection, ensuring full compliance with safety protocols.
- **Fire and Dust Suppression Systems**: In high-risk areas, including plant operations, fixed fire and dust suppression systems are installed to manage and minimize the likelihood of fire hazards and airborne contaminants, reducing the risk of incidents and ensuring a safer working environment.
- **Routine Monitoring of Hazardous Conditions**: We routinely assess operational areas for potential risks, such as noise exposure, dust, and other environmental hazards. This monitoring informs corrective actions and ensures that risks remain within safe limits.
- **Designated Safe Pathways**: Clearly marked and segregated walkways are implemented throughout the site to prevent unsafe interactions between personnel and vehicles or machinery, minimizing the risks associated with pedestrian safety.
- **Role-Specific Risk Controls**: Tailored monitoring and control measures are established for roles that involve specific high-risk tasks or responsibilities, ensuring that safety protocols are suited to the individual requirements of each position.

5.5 Business Continuity

Wards have an emergency contingency plan in place for emergencies and major incidents. This procedure includes the potential incidents that may occur on site and impacts that each may affect the business, health and safety and the environment. These include:

1. Accident
2. Fire and / or Explosion
3. Leak and / or Spillage
4. Escape of Toxic Gases / Fumes
5. Discovery of Asbestos Containing Materials (ACMs)
6. Discovery of Explosive Devices
7. Severe Weather:
    a. Extreme Heat
    b. Extreme Cold
    c. High Winds
    d. Flooding
8. Spread of Infectious Disease

To ensure response is effective as far as reasonably practicable, the contingency plans include key response measures, contact information of emergency services and response contractors and site information such as site maps and plans.

Wards Crompton Road also has specific site procedures to manage conditions stated in the Environmental permit- including odour, pests, dust management and fire prevention. These highlights potential risks because of these events on site and procedures in place to prevent harm to personnel and the environment.

5.6 Business and Commercial Risks

Donald Ward have identified potential commercial and business risks and implemented relevant commitments to mitigate the likelihood of these events occurring through policies. Examples include:

Anti-Corruption and Bribery- Wards are committed to conduct business in an honest and ethical manner. A zero-tolerance approach to bribery and corruption is taken, and act fairly and with integrity to business dealings and relationships. Systems are in place to counter bribery and corruption.

Equal Opportunities and Diversity Policy- Wards is committed to the principle of equal opportunities across all sites for personnel of different backgrounds, genders and diversities, and preventing discrimination and harassment.

Modern Slavery- the business is committed to limiting the risk of modern slavery occurring within the business, infiltrating supply chains, or any other business relationships.

These policies are covered as part of the staff induction and are available on SharePoint and on the public Duty of Care Document. These are reviewed periodically.

6 Operational Management

6.1 Roles and Responsibilities

The responsibility of personnel performing activities related to the health and safety and environmental management systems at Wards Crompton Road are specified in job specifications and the site procedures.

The company organogram is shown in Figure 4. Senior and management oversee operations on site to ensure that waste is correctly managed and compliance is maintained for health and safety, quality and environmental standards. Donald Ward Ltd HSEQ team are responsible for aiding sites in maintaining compliance for health, safety, environment and quality.

Figure 6- Donald Ward Ltd Organogram

6.2 Waste Management and Controls

Customer enquiries are received via different communication channels: phone, email and via the Ward website contact forms. Thorough checks are undertaken to determine if the waste can be accepted by one of the Wards sites as part of the quotation process.

A set of prompt questions covering customer requirements and waste classification is given to the customer, this is provided to staff during training. For some waste streams, additional information such as Safety Data Sheets, photos and analysis may be required to ensure that waste is correctly classified. Additional support can be provided by the Environment and Sustainability Team when required.

If the waste can be accepted, a quote is provided to the customer. Once the customer has accepted the quote- the collection is scheduled by the relevant team and logged on the Enwis system along with a unique reference number. Each collection is logged as a separate entry with an order number- which includes the classification of the waste (EWC, description), container type and date of collection. If a third party arranges a collection, all details are checked by customer services prior to the collection being entered on Enwis.

Once a waste has arrived on site, the weighbridge accesses the quoted data using the vehicle registration plate and Enwis reference number. For door trade, the name or details of the customer is searched on ENWIS for their account and the collection is logged on the system.

The company's waste acceptance procedure is followed for all waste arriving on site-

1.) An initial assessment via CCTV to determine if the waste matches the details on the system.
2.) The gross weight is logged on Enwis and the vehicle is then escorted to a designated area to tip.
3.) Further analysis and a detailed inspection is carried out on the waste, and the vehicle is recorded leaving the weighbridge to determine the net weight.
4.) Details are logged on Enwis of the weight received alongside a description and List of Waste Code.
5.) Any non-conforming items are identified, weighed and photos taken for upload onto Enwis. If the load cannot be accepted onto site, the non-conformance procedure is followed accordingly.
6.) If loads are rejected from site, the waste rejection process is followed.

Stock of waste on site is monitored daily by the site manager on Enwis. Further monitoring methods are in place including a site diary, monthly visual checks by site managers and stock reconciliation.

Collections are arranged when there is enough waste- whilst ensuring that stock is maintained within permitted limits. When waste is removed from site, each transfer of waste is allocated a designated collection reference number on Enwis to prevent double counting or inaccurate reporting. When waste is removed from site, it is passed through the site weighbridge. Photos and weights are recorded under the Enwis reference number.

6.3 Resources

Ward Recycling Ltd identifies, plans, and maintains control of the operational resources required to manage its waste and recycling activities effectively. The company operates under the principles of PAS 402:2025 and maintains traceability and oversight of resource usage

across its operations. These resources include personnel, equipment, site infrastructure, financial inputs, time, and information systems.

6.3.1 Resource Identification and Planning

Ward Recycling determines its resource needs through structured, routine monitoring of core operational indicators, including:

- **Orders and enquiries** – reviewed daily to assess service demand and route planning.
- **Waste input and output volumes** – tracked via calibrated weighbridges and monitored weekly via Enwis to determine material throughput and site capacity.
- **Labour requirements** – reviewed daily based on job volume, vehicle deployment, and seasonal peaks.
- **Fleet and plant utilisation** – evaluated using inspection logs, service logs and maintenance records to identify equipment sufficiency.
- **Storage capacity** – monitored daily in accordance with permit limits, material segregation plans, and health and safety protocols.
- **Market conditions and disposal costs** – reviewed daily to inform pricing models, customer reporting, and downstream material outlets.

6.3.2 Resource Control and Review Mechanisms

Ward Recycling controls its operational resources through established planning cycles and formal review procedures. The frequency and scope of these reviews are proportionate to the resource type and risk. Examples include:

Ward Recycling controls its operational resources through established planning cycles and formal review procedures. The frequency and scope of these reviews are proportionate to the resource type and risk. Examples include:

- **Daily**
  - Operations briefings to allocate staff, assess vehicle availability, and respond to service issues.
  - Site inspections and H&S checks covering plant, access, and loading areas.
  - Planned waste deliveries and collections.
  - Reactive maintenance requirements for plant and facilities.
  - Metal prices and waste outlets.
  - Labour availability on sites.

- **Weekly**
  - Labour and vehicle planning meetings to confirm resource sufficiency and adjust rotas and routing.
  - Review of material flows, site storage levels, and container usage.

- **Monthly**
  - Financial performance meetings addressing cost control, budget adherence, and service margins.

- Review of plant efficiency, maintenance schedules, and third-party subcontractor usage.
- Monthly visual checks of waste stockpiles by site managers.
- HSEQ site inspections and audits with site managers

- **Quarterly**
  - Collation of tonnages (waste received and removed) via Enwis and reported to the Environment Agency.
  - Quarterly financial reviews

- **Annually**
  - Strategic resourcing review to align business planning with service growth and contract renewals.
  - Workforce planning and training needs assessment (linked to compliance, operations, and customer service).
  - Full asset audit and capital investment planning.

6.3.3 Management of Financial, Time and Informational Resources

- **Financial resources** are managed via quarterly forecasting and budget controls. A structured capital investment plan ensures appropriate resource allocation for plant, fleet renewal, and compliance requirements.
- **Time resources** (staffing and scheduling) are managed through route planning systems, shift scheduling software, and job ticketing platforms. Productivity and turnaround are reviewed against service level agreements.
- **Information resources** are held within secure digital systems. These include:
  - Enwis- a weighbridge and tracking system for real-time input/output data.
  - Asset management software for fleet and equipment oversight.
  - CRM and job scheduling systems for customer records and service planning.
  - Internal reports, reviewed monthly by management.
  - Customer portal- where customers can review recycling performance.

All systems and records support auditability, traceability, and the production of PAS 402-2025 compliant outputs. Data is retained in accordance with the retention schedule required for Green Compass verification.

6.4 Storage

Waste storage requirements are maintained in line with the sites environmental permit, planning permission and Duty of Care requirements. As part of the enquiries process, once an accurate description of the waste has been provided, a suitable waste container is agreed to ensure it is securely stored during transit and does not impact human health or the environment.

Once a load has been accepted on site, it is moved to the designated storage area for storage pending re-processing or further disposal. Bulk items such as wood, inert and landfill waste are stored in bays outdoors, loose items (such as SRF and RDF feedstock) and fine materials such as plasterboard are stored undercover to mitigate the risk of emissions to air. All asbestos accepted on site is stored in a locked facility away from other waste streams.

All waste storage areas are on an impermeable surface, with runoff passing through the site drainage system and an interceptor to remove any residual contaminants. This is periodically inspected and maintained.

To maximise space, there is a skip yard for the transportation team to park their waste trucks, skips, roll on roll offs, etc. There is also a designated area on site to store diesel, hydraulic oil, Ad-blue, replaced waste oils to support operations. The site has the capacity to create a quarantine area for non-permitted waste streams. These are then arranged for collection via an authorised contractor.

6.5 Maintenance

The maintenance team manages maintenance on all Donald Ward Ltd sites. Routine maintenance is carried out on all machinery and plant to ensure that it is working efficiently and safely. This is carried out by competent third-party contractors and insurers- these are managed the maintenance department.

Daily checks are undertaken on all plant- this is tracked by the maintenance department to ensure checks are completed. In the event of a breakdown or fault with plant, the plant is safely taken out of service and contingency methods are undertaken to minimise risks to the environment (e.g. containment of oil leaks) and personnel. The issue is reported via a QR code and logged on the maintenance database. The appropriate third-party contractors are notified to investigate and determine the root cause and undertake any relevant repairs.

The MRF and SRF plant is fitted with fire suppression systems- these are inspected every 6 months. Fire extinguishers are also located around site to contain small fires on plant.

Spill kits are located around site to contain emergent spills from oil filled plant. They are maintained on a routine basis by operational staff.

7 Competence

During the recruitment process, it is crucial that competent candidates are hired and fulfil their duties correctly. The first stage of the process is personnel providing their resume, qualifications and other documentation to HR for assessment to determine if they are competent to fulfil the role stated in the job description. An initial interview is undertaken, and if successful either a formal interview is undertaken or a written offer of employment. During the onboarding process the relevant documentation is completed and qualifications provided, copies are logged on My Compliance on the individual's profile. This is only accessible to the individual and their line manager.

As part of their first day, staff and contractors will undertake a company induction- this consists of the history of the company, the current sites as well as health and safety (e.g. manual handling, fire safety and general site safety) environment (e.g. compliance with permits and preventing environmental harm) and HR topic areas. Content is reviewed on a periodic basis to reflect any company and personnel changes.

Specific training will be undertaken with new staff (or existing staff commencing a new role) by their supervisors. This includes coaching and shadowing of jobs, training of Safety Operating Procedures (SOP), risk assessments, environmental factors (e.g. completing of documentation) and reporting requirements of their role. Any additional training required to ensure personnel fulfil their roles is arranged by their line manager and relevant team. If there are any changes to legislation or standards that requires additional training or qualifications to undertake a specific role, this is organised via the HSEQ team.

Personnel who oversee and manage site activities are competent and hold the relevant qualifications- including the Certificate of Technical Competence (COTC). The current COTC holders from Ward Recycling Crompton Road are highlighted in Table 4 below:

Name	COTC Accreditation	Expiration Date
Donald Ward	Metal Recycling Sites Treatment- Hazardous Waste	19/02/2027
Jack Sanderson	Physical and Chemical Treatment of Hazardous Waste	22/02/2026

Table 4- COTC holders for Ward Recycling Crompton Road

Training records of staff are logged on their profile on My Compliance. If training needs to be renewed (e.g. COTC WAMITAB)- an email will be sent to line manager or individual prior to expiration to ensure the certification does not expire.

Where learnings and focus areas are identified from site inspections, accidents and incidents on sites, briefings and Toolbox talks are undertaken across all relevant sites to ensure personnel have an awareness of the site policies, processes and risks (including health, safety and the environment) associated with the specific activity or hazard.

8 Corrective, preventive and improvement actions

Donald Ward Ltd are committed to maintaining compliance with our environmental permits, legislation, British and International Standards and other key requirements for onward waste recovery, whilst protecting staff and assets.

8.1 Legal and other requirements

As part of our ISO 14001 and ISO 45001 requirements, in our Internal Management System, we maintain a legal register for the business. All applicable health, safety and environmental legislation is logged on the Compliance Register on My Compliance. This register includes details of the legislation requirements, and evaluation of compliances are undertaken on a periodic basis to evaluate the sites compliance and if any further actions are required.

Wards Recycling Ltd subscribe to several platforms that notifies subscribers of new legislation coming into force, regulatory amendments and new consultations and guidance that is relevant to business operations. These include ENDS, Barbour and IEMA.

Wards are also members of industry groups that evaluates industry risks, legislation changes and actions that will be required to comply with requirements. This includes the British Metal Recycling Association (BMRA), Bureau of International Recycling (BIR) 14, Chartered Institute of Waste Management (CIWM) and Construction, Logistics and Community Safety (CLOCS).

8.2 Audits

The HSEQ team undertake routine audits on site processes in line with ISO 9001, ISO 14001 and ISO 45001, as well as monthly site inspections. These audits highlight potential issues or compliance risks which may result in an incident or breach to the sites environmental permit.

Third party audits are also undertaken by stakeholders, regulators or external audits when required. These audits focus on compliance with health, safety and environmental standards (e.g. ISO 9001, ISO 14001, 45001, RISQS) and our environmental permit.

8.3 Action Management and Non-Conformances

Measures and procedures are in place to ensure we comply with legislation, Environmental Permits, as well as preventing harm to the environment, protecting staff and producing a high-quality product from processing. However, non-conformances (such as accidents, incidents, near misses, observations and findings from site inspection) may still occur on site because of various factors. These need to be recorded and investigated thoroughly to identify root causes and mitigate the risk of the event re-occurring.

Any form of non-conformance is encouraged to be reported by staff. This is briefed as part of the induction, and all staff are provided with a QR code located on their access pass which includes a link to the near miss reporting form. This is sent to the relevant team for review and investigation.

Any complaints from stakeholders and customers are also recorded and investigated thoroughly to determine if the source was a Ward site, and if so, the root cause is recorded and remediation work undertaken.

Customer services complaints are logged on the Ward Feedback and Claims Log and investigated. Any actions or follow ups is included in the register and tracked.

All health, safety and environmental non-conformances and complaints are logged on the My Compliance database. Details of the event must be included in the report, as well as root causes and immediate action undertaken. Preventative and corrective actions that arise from complaints and investigations are also logged on My Compliance and allocated to the relevant personnel.

Once an action has been completed and is closed on My Compliance, the action owner must provide details of how the action was completed.

Corrective and improvement actions arise from internal audits by Wards HSEQ team and external verification audits by accredited bodies. These are logged in the action module on My Compliance.

Non-compliances, complaints, actions and audit findings on site are discussed in quarterly HSEQ site meetings and management reviews. Minutes are logged on Wards SharePoint system.

9 Performance review

9.1 Performance Summary

Table 5 presents the performance summary for Donald Ward Ltd Crompton Road 1st January 2024- 31st December 2024

Performance Summary	**Total Tonnes**
Total material inputs this period	270096
Waste used/retained on site this period e.g. for engineering purposes	0
Waste remaining on site at end of this period (unprocessed)	5882
Waste remaining on site at end of this period (processed)	3926
Total waste remaining on site at end of this period	9808
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	103328
Waste sent offsite for energy recovery this period	26280
Qualifying fines/landfill cover	123915
Non-qualifying fines	13879

Materials sent offsite as non-waste this period e.g. end of waste	0
Waste sent off for disposal (incineration without energy recovery)	0
Total materials sent off site this period	267402

Table 5- Performance Summary of Wastes at Wards Crompton Road 2024-2025

9.2 Annual recovery and disposal tonnages

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
01 04 09- Waste Sand and Clays	123	19 12 12	123	Other wastes from mechanical treatment of wastes	Landfill Cover-qualifying fines
10 01 01- bottom ash, slag and boiler dust	28	19 12 12	28	Other wastes from mechanical treatment of wastes	
10 01 19- wastes from gas cleaning (non-haz)	0.5	19 12 12	1	Other wastes from mechanical treatment of wastes	
10 11 03- Waste glass fibrous material	374	19 12 12	374	Other wastes from mechanical treatment of wastes	
10 12 01- Waste Preparation Mixture before thermal processing	93	19 12 12	93	Other wastes from mechanical treatment of wastes	
10 12 05- sludges and filter cakes from gas treatment	16	19 12 12	16	Other wastes from mechanical treatment of wastes	
11 01 10- sludges and filter cakes	7	19 12 12	7	Other wastes from mechanical treatment of wastes	

12 01 17- waste blasting material (non-haz)	51	19 12 12	16	Other wastes from mechanical treatment of wastes	
17 05 06- dredging spoil (non-haz)	1	19 12 12	1	Other wastes from mechanical treatment of wastes	
17 06 04- Insulation materials (non-haz)	16	19 12 12	16	Other wastes from mechanical treatment of wastes	
19 01 12- Bottom ash and slag	153	19 12 12	153	Other wastes from mechanical treatment of wastes	
19 09 04- spent activated carbon	26	19 12 12	26	Other wastes from mechanical treatment of wastes	
19 12 09- Minerals	3034	19 12 09	1138	Minerals	Inorganic materials recycling into new inert materials
		19 12 12	1896	Other wastes from mechanical treatment of wastes	Landfill Cover- qualifying fines
19 12 12- Other wastes from mechanical treatment of wastes	50252	19 12 12	123885	Other wastes from mechanical treatment of wastes	
		19 12 12	4554	Other wastes from mechanical treatment of wastes	Landfill Cover- non qualifying fines
20 03 03 street-cleaning residues	11	19 12 12	11	Other wastes from mechanical treatment of wastes	Landfill Cover- qualifying fines

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
03 01 05- sawdust, shavings,	1125	03 01 05	1075	Sawdust, shavings, cuttings, wood,	Wood recycling- The wood waste is

cuttings, wood, particle board and veneer				particle board and veneer	shredded down into chips and then used in the manufacture of Biomass products
		19 12 07	50	Wood other than that mentioned in 19 12 06	
15 01 03 wooden packaging	265	15 01 03	108	wooden packaging	
		19 12 07	157	Wood other than that mentioned in 19 12 06	
17 02 01 wood	8123	17 02 01	184	Wood	
		19 12 07	7939	Wood other than that mentioned in 19 12 06	
19 12 07 - wood other than that mentioned in 19 12 06	2101	19 12 07	12621	Wood other than that mentioned in 19 12 06	
20 01 38 Wood	201	19 12 07	201	Wood other than that mentioned in 19 12 06	

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
02 01 03- Plant tissue waste	7	19 12 10	419	combustible waste (refuse derived fuel)	Incineration fuel for cement kilns.
20 01 08- biodegradable Kitchen and Canteen Waste	255				
02 01 04- Waste plastics	424	02 01 04	98	Waste plastics	Inorganic materials recycling
		19 12 10	326	combustible waste (refuse derived fuel)	Incineration fuel for cement kilns.
08 01 12- Waste Paint Varnishes	451	19 12 10	451	combustible waste (refuse derived fuel)	
04 02 22- wastes from processed textile fibres	58	19 12 10	58	combustible waste (refuse derived fuel)	

12 01 05- plastic shaving and turnings	19	19 12 10	19	combustible waste (refuse derived fuel)	
15 01 05- composite packaging	12	19 12 10	12	combustible waste (refuse derived fuel)	
15 01 06- Mixed Packaging	1044	19 12 10	1044	combustible waste (refuse derived fuel)	
15 02 03 absorbent, filter materials wiping cloths and protective clothing	1531	19 12 10	1531	combustible waste (refuse derived fuel)	
16 03 04- Inorganic materials other than those mentioned in 16 03 03.	938	19 12 10	938	combustible waste (refuse derived fuel)	
16 03 06- Organic waste (non-haz)	19	16 03 06	20	Organic waste (non-haz)	
17 02 03- Plastics	576	17 02 03	399	Plastics	UPVC Plastic Recovery
		19 12 10	177	combustible waste (refuse derived fuel)	Incineration fuel for cement kilns
19 12 10- combustible waste (refuse derived fuel)	3894	19 12 10	16450	combustible waste (refuse derived fuel)	
20 01 11- Textiles	2216	19 12 10	2216	combustible waste (refuse derived fuel)	
20 01 28 paints, inks, adhesives and resins	74	19 12 10	74	combustible waste (refuse derived fuel)	
20 01 39 Plastics	37	19 12 10	37	combustible waste (refuse derived fuel)	
20 03 07- Bulky Waste	2528	19 12 10	2528	combustible waste (refuse derived fuel)	

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
10 12 08- Waste ceramic, bricks, tiles and construction products	656	17 01 07	656	mixtures of concrete, bricks, tiles and ceramics	Inorganic materials recycling into new inert materials

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
15 01 02- Plastic Packaging	62	15 01 02	148	Plastic Packaging	Plastic Recycling- separated by type and then granulated for use as re-grind in plastics production
20 03 01- mixed municipal waste	86				

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
15 01 01- Paper and cardboard packaging	1093	15 01 01	1579	Paper and cardboard packaging	Paper Recycling and Recovery via paper mills
20 03 01- mixed municipal waste	483				
20 01 01- Paper and cardboard	3				

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
15 01 07- Glass Packaging	172	15 01 07	60	Glass Packaging	Inorganic materials recycling into
		17 01 07	112	Mixtures of concrete, bricks,	

				tiles and ceramics	new inert materials
20 01 02-Glass	165	17 01 07	165	Mixtures of concrete, bricks, tiles and ceramics	

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
16 02 14-discarded equipment (non-haz)	439	19 10 04	439	fluff-light fraction and dust	Inorganic materials recycling

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
16 01 03-End of Life Tyres	280	16 01 03	236	End of Life Tyres	Granulated and used in rubber manufacturing
		19 12 12	44	Other wastes from mechanical treatment of wastes	Landfill Cover-qualifying fines

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
17 04 01-copper, bronze, brass	6	17 04 01	151	copper, bronze, brass	Metal recycling
19 10 04- fluff-light fraction and dust	141				
17 04 11-Cables	4				
17 04 02-Aluminium	182	17 04 02	805	Aluminium	
19 10 04- fluff-light fraction and dust	623				
17 04 11-Cables	2	19 10 04	2	fluff-light fraction and dust	Inorganic materials recycling

17 04 04- Zinc	2	19 10 02	2	non-ferrous waste	Metal recycling
19 10 04- fluff-light fraction and dust	14	17 04 05	14	Iron and steel	
19 10 04- fluff-light fraction and dust	7	17 04 07	7	mixed metals	
19 10 04- fluff-light fraction and dust	81	19 12 02	81	Ferrous metal	
19 10 01- iron and steel waste	2036	19 10 01	2502	iron and steel waste	
17 09 04 mixed construction and demolition wastes	226				
19 10 04- fluff-light fraction and dust	250				
19 10 02- non-ferrous waste	1713	19 10 02	962	non-ferrous waste	Metal recycling
		19 10 04	351	fluff-light fraction and dust	Inorganic materials recycling
		20 01 40	400	Metals	Metal recycling
20 01 21- Spent grinding bodies and grinding materials	157	20 01 40	157	Metals	
20 01 40 Metals	497	20 01 40	4620	Metals	

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
17 05 04 soil and stones	24525	17 05 04	18005	Soil and stones other than those mentioned in 17 05 03	Inorganic materials recycling into new inert materials
		19 12 12	6520	Other wastes from mechanical treatment of wastes	Landfill Cover-qualifying fines

17 01 01 Concrete	229	17 01 07	229	mixtures of concrete, bricks, tiles and ceramics	Inorganic materials recycling into new inert materials
17 01 07 mixtures of concrete, bricks, tiles and ceramics	7375	17 01 07	33305	mixtures of concrete, bricks, tiles and ceramics	Inorganic materials recycling into new inert materials

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
17 08 02-Gypsum Based Construction Materials	7180	17 08 02	6658	Gypsum Based Construction Materials	Recycling of into other gypsum-based materials
		19 12 07	200	Wood other than that mentioned in 19 12 06	Wood Recovery
		20 01 40	50	Metals	Metal Recovery

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
17 09 04 mixed construction and demolition wastes	52425	17 09 04	24	mixed construction and demolition wastes	Organic materials recycling

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
19 10 03* Fluff light fraction containing hazardous substances	806	20 01 40	80	Metals	Metal Recovery
		19 10 04	736	fluff-light fraction and dust	Inorganic materials recycling

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of	Outgoing Tonnage	Waste Stream	Destination Treatment Description

		Waste Code			
19 10 04- fluff-light fraction and dust	45614	19 10 04	5767	fluff-light fraction and dust	Inorganic materials recycling

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
19 12 04- Plastic and rubber	30	19 10 04	30	fluff-light fraction and dust	Inorganic materials recycling

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
20 02 01- Biodegradable waste	895	20 02 01	738	Biodegradable waste	Composting

Incoming List of Waste Code	Incoming Tonnage	Outgoing List of Waste Code	Outgoing Tonnage	Waste Stream	Destination Treatment Description
20 03 01 mixed municipal waste	36585	20 03 01	97	mixed municipal waste	Landfill Cover-qualifying fines

Table 6- Annual recovery and disposal tonnages

Note: large quantities are processed through the MRF, SRF and ASR plant, therefore accurate tonnages of some waste streams cannot be determined and are estimated. Figures are also rounded to the nearest whole number.

Differences between the incoming and outgoing stock tonnage reported in the EA returns and the data presented in this report arise from in-house duplications and errors in stocking/disposal made by the Enwis system. Corrections were made to the data after submissions of the returns.

These matters have now been reviewed and addressed internally, and the appropriate corrections have been agreed. A consistent approach to data collation and reporting has been established and will be applied going forward to ensure alignment between EA returns and internal reporting.

9.3 Material processed per waste hierarchy category

Waste Hierarchy Category	Annual %
Re-use	0
Repair	0
Recycle/Recovery	84.98
Energy Recovery	9.83
Landfill Cover	5.19
Disposal	0

Table 7- Material processed, reported as a percentage of the annual incoming.

Landfill Diversion Rate and Overall Material Recovery Rate: 94.81%

Percentage of waste leaving site as fines: 51.53%