



RORY J HOLBROOK LTD

PAS 402:2025 ANNUAL REPORT

January 2025 *to* December 2025



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HOW WE OPERATE

Rory J Holbrook Ltd is a family-run haulage, plant and aggregate supplier founded in 1988 by Mr Rory Holbrook. The company operates throughout East Anglia and has nationwide capabilities. As well as our core offering, we also offer supporting services like waste management to a range of clients to support the construction, infrastructure, utilities and commercial sectors. Our strong focus on compliance runs deeply throughout our operations.

While the wider business includes haulage, plant and materials supply, this PAS 402:2025 report applies specifically to our waste management activities. These activities include the receipt, inspection, screening, crushing, stockpiling and transfer of non-hazardous waste materials, for recycling, recovery or disposal. Priority is given to recycling and recovery where possible in line with the waste hierarchy.

Our waste operations are supported by experienced operational teams and modern plant and vehicles. Staff involved in the management of waste activities hold appropriate qualifications and competencies for their roles, including WAMITAB certificates and CPCS qualifications. Ongoing training and supervision ensures that waste is handled safely, consistently and in accordance with permit and legal requirements.

Waste movements are planned and controlled to maintain full traceability from acceptance through to final recovery or disposal. All waste entering our site is subject to defined acceptance and inspection processes.

Health, safety, environmental protection and quality of service are central to how we operate. We maintain clear responsibilities across the business to manage risk, protect the environment and minimise nuisance to the communities we operate in. Continued investment in modern fleet, equipment and operating practices supports our commitment to continual improvement and responsible waste management.

This report sets out how our waste management activities operate at sites included within the scope of PAS 402:2025 certification, covering the reporting period from 1st January 2025 to 31st December 2025.

Report Approved By: Rory Holbrook, Managing Director

Date: Tuesday 17th March 2026

Signature:



OPERATIONAL SCOPE

Rory J Holbrook Ltd operates a wider business that includes aggregates supply, haulage, plant and earthworks services. However, only activities associated with the acceptance, handling and transfer of waste materials are included within the scope of this report. All other business activities are excluded unless they directly support the waste management operations described. Our fleet of vehicles support all sites where operationally required and are subject to their own compliance procedures.

Locations

Wymondham Quarry

Site Address:

Rory J Holbrook Ltd – Wymondham Quarry, Stanfield Road, Wymondham, NR18 9RL

Wymondham Quarry operates as a waste management facility, accepting non-hazardous waste derived from construction and demolition. Activities at this site include the receipt, inspection, screening, crushing, stockpiling and transfer of waste materials for recycling, recovery or disposal.

All waste is accepted in accordance with defined waste acceptance criteria and site procedures. Materials suitable for recovery are recovered and stockpiled before being sold to the public or transferred to appropriate recycling and recovery facilities, either internally or via authorised third-party outlets. Residual waste that cannot be recovered is directed to authorised disposal facilities as last resort. The site also operates as an aggregates supply and collection facility, allowing us to offer an end-to-end solution for our customers.

Lakenheath Recycling Centre

Site Address:

Rory J Holbrook Ltd, Brandon Road, Lakenheath, IP27 9FB

Our Lakenheath site operates as a waste management and aggregate supply & production facility. Activities at this site include the receipt, inspection, screening, crushing, stockpiling and transfer of waste materials for recycling, recovery or disposal. All materials are handled in accordance to the site's Environment Agency permit. Materials are processed on-site to produce recycled aggregates suitable for reuse.

All waste accepted at this site is managed in line with defined waste acceptance criteria and operational controls. Materials are prioritised for recovery and reuse wherever possible, with disposal only used where recovery routes are not available.

Sites Not Included in PAS 402:2025 Scope

Roudham Head Office

The company's primary administrative base, housing office-based staff and a central workshop facility. No waste acceptance, processing, storage or transfer activities takes place at this location and is therefore excluded from the scope of this PAS 402 report.

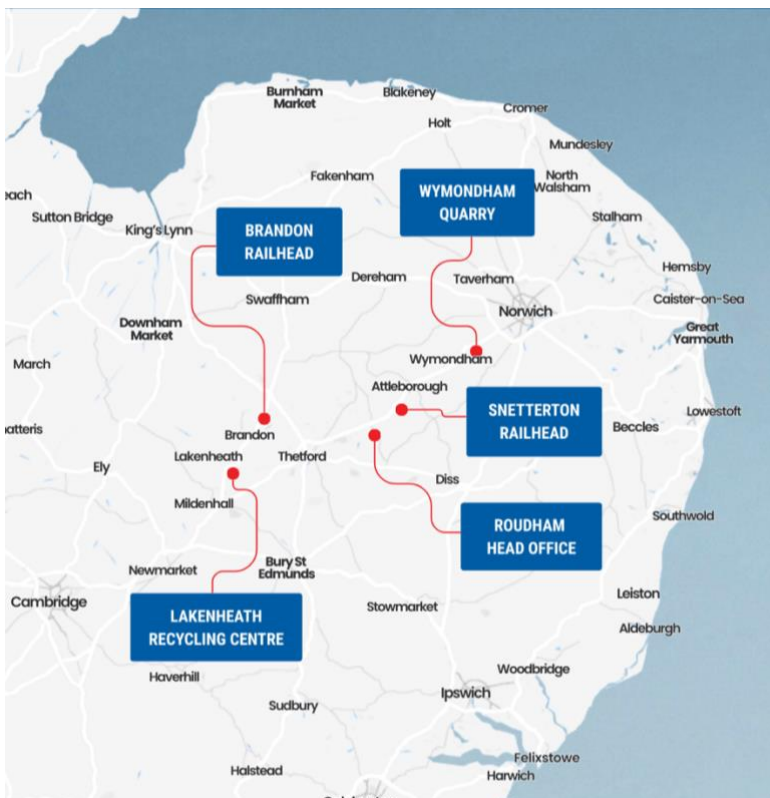
Brandon Railhead

Brandon Railhead is used for the import and distribution of primary aggregates supplied via rail and is our longest standing railhead. No waste management or waste recovery activities are carried out at this site and is excluded from the scope of this PAS 402 report.

Snetterton Railhead

Snetterton Railhead is used for the important and handling of primary aggregates delivered by rail from quarries across the country. It's the latest addition to our list of depots but does not undertake waste management activities and is therefore excluded from the scope of this PAS 402 report.

Below is a map of our depot locations:

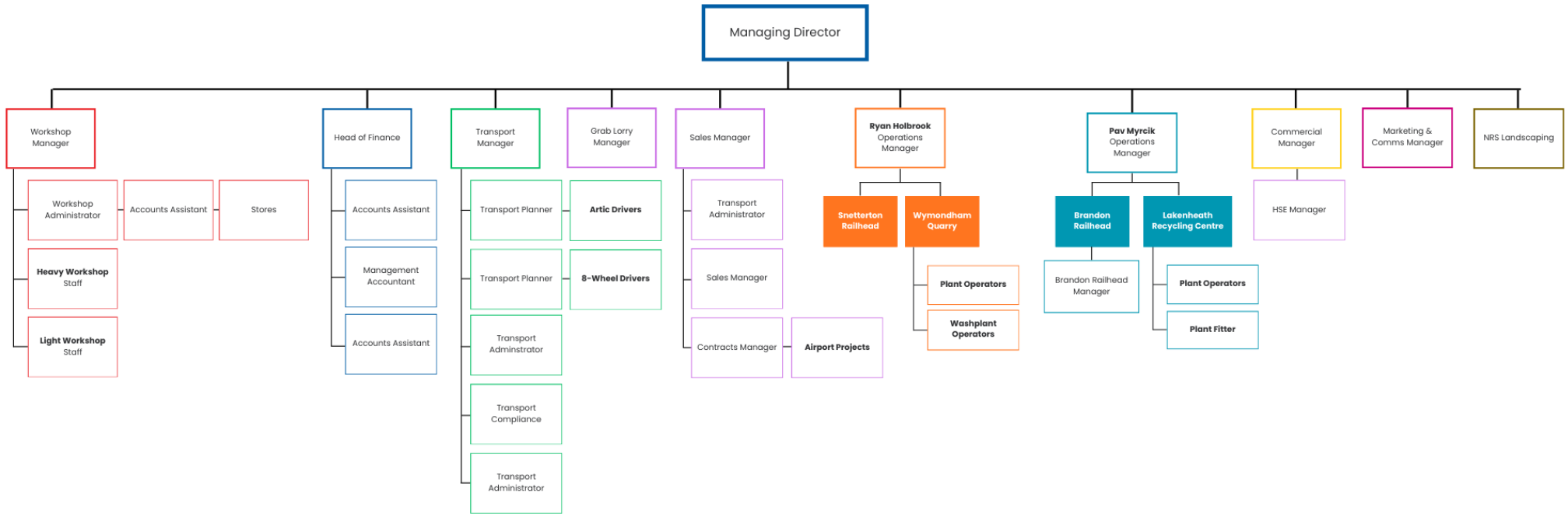


COMPANY MANAGEMENT SYSTEM & STRUCTURE

Rory J Holbrook Ltd has a quality and environmental management system that is accessible to all staff in electronic and hard-copy format. Key system documents, including the environmental permit and waste carriers license are readily available on site and can be provided to interested parties upon request.

The company's organisational structure can be found below:

Management Structure



PERMITTED ACTIVITIES

Wymondham Quarry

Environmental Permits		
Permit Name & Reference	Activities	Limits/Expiry Dates
Wymondham Quarry Environmental Permit EPR/HB3103XE	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R5: Recycling/reclamation of other inorganic compounds</p> <p>R10: Land treatment resulting in benefit to agriculture or ecological improvement</p>	<p>R13: Secure storage of wastes listed in Table S2.1 and S2.2 for the purpose of recovery. Storage of wastes listed in Table S2.1 shall be limited to three years. Storage of waste listed in table S2.2 shall be limited to 12 months.</p> <p>R5: Use of waste types specified in table S2.1 for the purposes of construction work and/or restoration, reclamation or improvement of land.</p> <p>R10: Use of waste to create/treat a final growth layer. Wastes listed in Table S2.1 may only be recovered in the final 500mm layer of the scheme.</p> <p>The total quantity of waste to be accepted at the site shall not exceed 149,150 m³</p>
Waste Carriers License CBDU621845	Waste carrier, broker and dealer	Expires 5 th February 2029

Table S2.1 Permitted waste types and quantities for use of waste in deposit for recovery	
Maximum quantity	The total quantity of waste to be accepted at the site shall not exceed 149,150 m ³
Waste code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	wastes from mineral excavation
01 01 02	wastes from non-metalliferous excavation (waste overburden and interburden only)
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	waste gravel and crushed rocks other than those containing dangerous substances
01 04 09	waste sand and clays
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones (subsoil and stones only – excluding topsoil and peat)
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 09	minerals (for example sand, stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals – excludes fines from treatment of any non-hazardous waste or gypsum from recovered plasterboard.
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones (subsoil and stones only – excluding topsoil and peat)

Table S2.2 Permitted waste types and quantities for use of waste in land treatment	
Maximum quantity	The total quantity of waste to be accepted at the site shall not exceed 2,350 m ³
Waste code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 05	soils (excluding excavated soils from contaminated sites), stones and dredgings
17 05 04	soil and stones including chalk other than those mentioned in 17 05 03 (topsoil and peat only)
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones (topsoil and peat only)

Planning Permission No.	C/7/2013/7014
Applicant:	Longwater Gravel
Location:	Wymondham Quarry, Stanfield Road, Wymondham, Norfolk NR18 9RL
Proposed Development:	Hybrid application for part Full Planning Permission for an Aggregate Recovery Facility AND part approval pursuant to S73 of the TCPA 1990 for non-compliance with condition 2 (timescales) and condition 3 (approved documents) of permission reference C/7/2013/7014 to extend the operational life of the quarry and associated restoration to agriculture and amend the phasing of restoration.

An extension application is currently in progress at this site. This does not affect the activities covered within this report, which relate only to the existing permitted operations.

Lakenheath Recycling Centre

Environmental Permits		
Permit Name & Reference	Activities	Limits/Expiry Dates
Lakenheath Recycling Centre Environmental Permit EPR/HB3305TR	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p>R5: Recycling/reclamation of other inorganic materials</p>	<p>Physical treatment including manual and mechanical sorting, separation, crushing, screening and blending of non-hazardous waste for recovery.</p> <p>Wastes shall be stored for no longer than 3 years prior to recovery.</p> <p>Storage and treatment of wastes shall take place on an impermeable surface.</p> <p>The maximum quantity of waste accepted at the site shall be less than 400,000 tonnes per year</p>
Waste Carriers License CBDU621845	Waste carrier, broker and dealer	Expires 5 th February 2029

Table S2.1 Permitted waste types and quantities for inert waste recycling	
Maximum quantity	The maximum quantity of waste accepted at the site shall be less than 400,000 tonnes per year
Waste code	Description
01	Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals
01 04	wastes from physical and chemical processing of non-metalliferous minerals

01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	waste sand and clays
10	Wastes from thermal processes
10 01	Wastes from power stations and other combustion plants (except 19)
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14
10 11	wastes from manufacture of glass and glass products
10 11 12	clean glass other than those mentioned in 10 11 11
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)
10 13	wastes from manufacture of cement, lime and plaster and articles and products made from them
10 13 14	waste concrete only
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 07	clean glass only
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 01	concrete, bricks, tiles and ceramics
17 01 01	concrete
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	wood, glass and plastic
17 02 02	clean glass only
17 03	bituminous mixtures, coal tar and tarred products
17 03 02	bituminous mixtures other than those mentioned in 17 03 01, including waste comprised of clean road stone swept from newly laid roads
Table S2.1 Permitted waste types and quantities for inert waste recycling	
Maximum quantity	The maximum quantity of waste accepted at the site shall be less than 400,000 tonnes per year

Waste code	Description
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	soil and stones other than those mentioned in 17 05 03, including waste comprised of clean road stone swept from newly laid roads
17 05 06	dredging spoil other than those mentioned in 17 05 05
17 05 08	track ballast other than those mentioned in 17 05 07
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 08	wastes from waste water treatment plants not otherwise specified
19 08 02	washed sewage grit (waste from desanding) free from sewage contamination only
19 08 99	stone filter media free from sewage contamination only
19 09	wastes from the preparation of water intended for human consumption or water for industrial use
19 09 02	sludges from water clarification
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	clean glass only
19 12 09	minerals (for example sand, stones)
19 12 12	soil from treatment of construction/demolition waste only
19 13	wastes from soil and groundwater remediation
19 13 02	solid wastes from soil remediation other than those mentioned in 19 13 01
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 02	clean glass only
20 02	garden and park wastes (including cemetery waste)
20 02 02	soil and stones

Planning Permission No.	F/14/0561
Applicant:	Elveden Farms
Location:	Rory J Holbrook Ltd, Brandon Road, Lakenheath, IP27 9FB
Proposed Development:	<p>Application for lawful Development Certificate at Lakenheath Recycling Centre, Brandon Road, Lakenheath, Suffolk for the use of the land for;</p> <p>(1) Importation of inert waste including concrete, brick, tarmac, topsoil and subsoil;</p> <p>(2) Crushing and grading and storage of concrete, brick, tarmac, for sale from site</p> <p>(3) Screening of soils, storage of screened soils for sale from site;</p> <p>(4) Importation of aggregates including sand, gravel, limestone, carstone and recycled rail ballast of varying sizes for sale on site.</p>

CLIENT RELATIONSHIP

Rory J Holbrook works with a broad range of clients including construction contractors, groundworks and civil engineering companies, utilities providers and commercial clients. Maintaining effective client relationships is an important part of how we manage waste quality, environmental performance and service delivery.

Clear communication with clients begins at the enquiry stage. Clients are provided with verbal guidance on the types of waste that can and cannot be accepted, along with any specific requirements relating to segregation or presentation of materials. This helps manage expectations from the outset and reduces the risk of non-conforming waste arriving at site.

Operational controls support this approach. Loads are visually inspected on arrival, and where waste does not meet acceptable criteria, a driver refusal or site rejection process is followed. This ensures that unsuitable or prohibited wastes are not accepted and that issues are addressed properly with the client. Common problem wastes are actively highlighted to clients through verbal guidance, including hazardous materials and wastes requiring segregation.

Client communication and traceability are supported through the use of weighbridge tickets and electronics records. Waste movements are recorded at the point of receipt, and tickets are generated for each transaction. These records are issued with invoices and can be provided to clients on request, supporting their own environmental reporting and compliance requirements. Where requested, recycling

and recovery information can be supplied to assist clients with demonstrating performance against environmental targets.

Client feedback is gathered through a combination of direct contact, telephone calls and email communication, alongside informal feedback gained through repeat business and ongoing working relationships. Where issues or complaints arise, these are addressed as they occur, with a focus on resolving matters quickly and preventing reoccurrence.

Environmental performance is closely linked to client engagement. By encouraging waste segregation and reducing rejected or incorrectly presented loads, unnecessary vehicle movements are avoided and recovery rates are improved. This approach benefits both our clients and the environment by reducing costs, emissions and operational inefficiencies.

IMPACTS & RISKS

We recognise that our waste management activities have the potential to impact health and safety, service quality and the environment. To identify and manage these impacts and risks, the business maintains site-specific risk assessments covering both health and safety and environmental aspects of its waste operations. These assessments are reviewed annually, and additionally when there are significant changes to activities, plant or site arrangements.

Health & Safety Risks

The primary health and safety risks associated with the waste management activities at the site within the scope relate to operational plant and vehicle movements. Key risks identified include:

- Vehicle movements and traffic management within site boundaries
- Loading and unloading of vehicles
- Working in proximity to mobile plant
- Falls from vehicles or plant

These risks are assessed at a site-specific level and managed through a combination of site controls, operating procedures, supervision and staff training. Site rules and the provision of appropriate PPE support the safe operation of activities, and daily site inspections are undertaken to confirm that controls remain effective.

Environmental Risks

The main environmental risks associated with the waste management activities include:

- Dust generation
- Noise
- Mud on the public highway
- Surface water run off

These risks are managed through defined operational controls and ongoing monitoring. Daily site inspections and visual checks are carried out to identify issues such as dust, mud tracking or spillages. Where risks are identified, corrective actions are taken promptly to prevent nuisance or environmental harm.

Spill kits are available on site and in all operational vehicles and staff are aware of procedures to follow in the event of a spill. Plant and vehicle maintenance plays a key role in risk control and is managed through a structured maintenance regime, including the use of R2C, a digital asset management system used to plan, record and monitor maintenance of the fleet and site equipment.

Interested Parties

In identifying and managing impacts and risks, Rory J Holbrook Ltd considers the needs and expectations of relevant interested parties including:

- Clients
- Employees
- Regulatory bodies, including the Environment Agency and Local Authority
- Local communities, neighbours and landowners
- Certification bodies
- Insurers

Engagement with these parties helps inform decision-making and supports continual improvement in environmental performance and risk management.

Unplanned Events & Business Continuity

The business recognises that not all events can be predicted. Consideration has therefore been given to unplanned incidents and external factors that could affect operations, including extreme weather, fire, spillages, plant or vehicle breakdown, non-conforming incoming waste materials and disruption to staffing and supply chains.

Arrangements for managing unplanned incidents and maintaining continuity of operations are addressed through the company's Environmental Management System, which includes provisions for incident response, operational flexibility and the redirection of waste where necessary.

Insurance

Rory J Holbrook maintains appropriate insurance cover to support the management of operational and environmental risk. This includes public and products liability, employers' liability, contractors all risk, motor fleet and goods in transit insurance, provided by Aviva Insurance Limited and brokered via Pangea Insurance East Anglia.

OPERATIONAL MANAGEMENT

Rory J Holbrook Ltd manages its waste operations through defined day-to-day controls that ensure waste is accepted, handled, processed and transferred safely, legally and consistently at the sites within scope.

Waste Acceptance & Control

Waste is received at site via a combination of Rory J Holbrook Ltd's own fleet and third-party vehicles. The company's own fleet primarily consists of grab lorries and tippers, operating across both Wymondham and Lakenheath.

Waste acceptance begins at the booking stage, where waste type is verbally confirmed with the client. Where waste is collected from a client's site, drivers visually check the load prior to collection to confirm that it matches the description provided.

On arrival at site, all loads are subject to visual inspection by the weighbridge operative and site operational team to confirm that the waste is as described and suitable for acceptance. Loads are inspected before tipping and during tipping, ensuring that the entire load is assessed and not only those areas visible on initial inspection. Plant operators also monitor loads during tipping to identify any non-confirming materials.

Where waste does not meet acceptance criteria, the load is rejected and either returned to the producer or directed to an authorised third-party facility capable of treating or disposing of the material. The final decision is made by the site's operations manager, Pav Myrcik for Lakenheath Recycling Centre or Ryan Holbrook for Wymondham Quarry.

On-Site Processing Activities

Both Wymondham and Lakenheath undertake crushing, screening and stockpiling of non-hazardous waste materials in line with permit requirements.

Incoming materials are directed to designated areas of the site where processing takes place using mobile plant. Waste streams are managed separately to maintain control of material quality, avoid contamination and ensure suitability for recover.

Segregation & Stockpile Management

Segregation of waste materials is carried out using mobile plant to separate materials into defined stockpiles. Different waste streams are kept physically separate to prevent cross-contamination and maintain material quality.

Stockpiles are actively managed to control size, minimise storage duration and reduce environmental risk. Materials are turned over regularly as part of routine operations, with priority given to moving processed materials off site for reuse, recovery or onward transfer.

Weighbridge & Recording

Both sites are equipped with calibrated weighbridges and all incoming and outgoing loads are weighed. Weighbridge tickets are generated electronically and form part of the operational record for each waste movement. These records support traceability and are used for invoicing, reporting and compliance purposes.

Outgoing Materials & Recovery Routes

Processed materials are managed through a range of recovery routes depending on material type and operational requirements. Recycled materials may be:

- Sold to the general public
- Used on internal Rory J Holbrook Ltd projects
- Transferred to authorised third-party recovery facilities

Materials that cannot be reused or recovered internally are directed to appropriate third-party facilities in accordance with permit and legal requirements.

Plant, Equipment & Maintenance

Operational activities are supported by a range of mobile plant, including:

- Loading shovels
- Screeners and three-way screeners
- Jaw crushers
- Dozers
- Excavators

Plant is primarily owned, with additional equipment hired where operational demand requires. Maintenance of plant and vehicles is managed through planned inspection and servicing arrangements. The condition and availability of equipment is monitored to ensure safe and reliable operation.

Supervision & Responsibility

Day-to-day operational control of the sites is managed by the site operations managers. RH is responsible for operations at Wyndham Quarry and PM is responsible for operations at Lakenheath recycling centre.

Site management has the authority to intervene operations, stop activities where necessary and ensure that waste is managed in line with permit conditions and operational controls. RH holds WAMITAB AND SMSTF qualifications and PM holds WAMITAB and IOSH.

Management Of Non-Routine Situations

Arrangements are in place to manage non-routine and abnormal situations. In the event of plant breakdown, equipment is immediately taken out of use and is not returned to service until a full assessment has been completed and repairs approved. Decisions regarding plant availability are made jointly by the site operations manager and plant fitter.

During extreme weather, operations affected by conditions are minimised or suspended until it is deemed safe to resume.

Where a load arrives late or out of specification, it's directed to a quarantine area where impurities can be segregated, materials re-assessed and approval given for appropriate treatment or disposal.

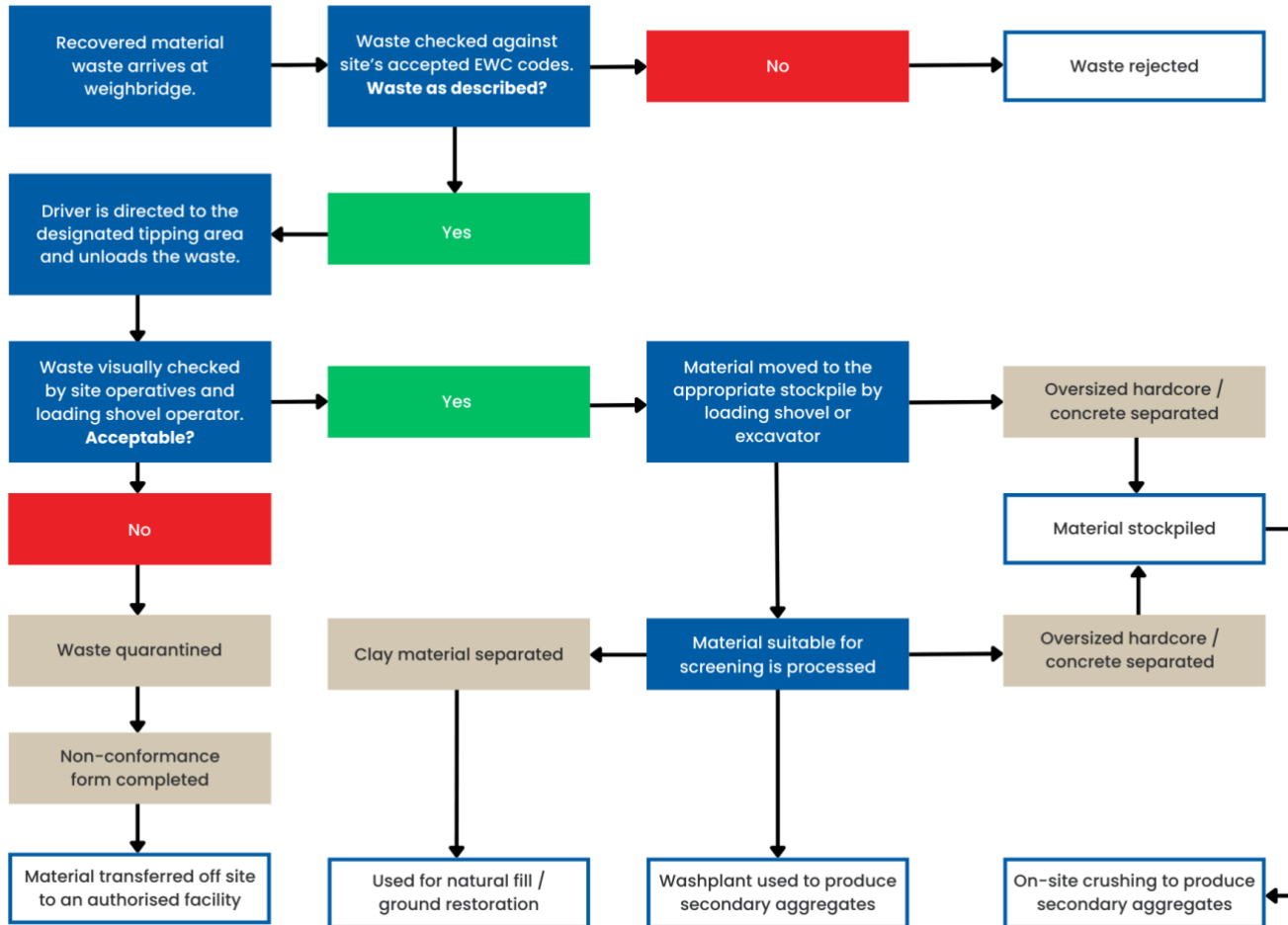
Permit Compliance in Practice

Permit compliance is managed through a combination of pre-acceptance checks, visual and physical inspections on arrival and ongoing site supervision. Knowledge of permitted waste types and activities is held across the site team, with overall responsibility resting with the site operations manager.

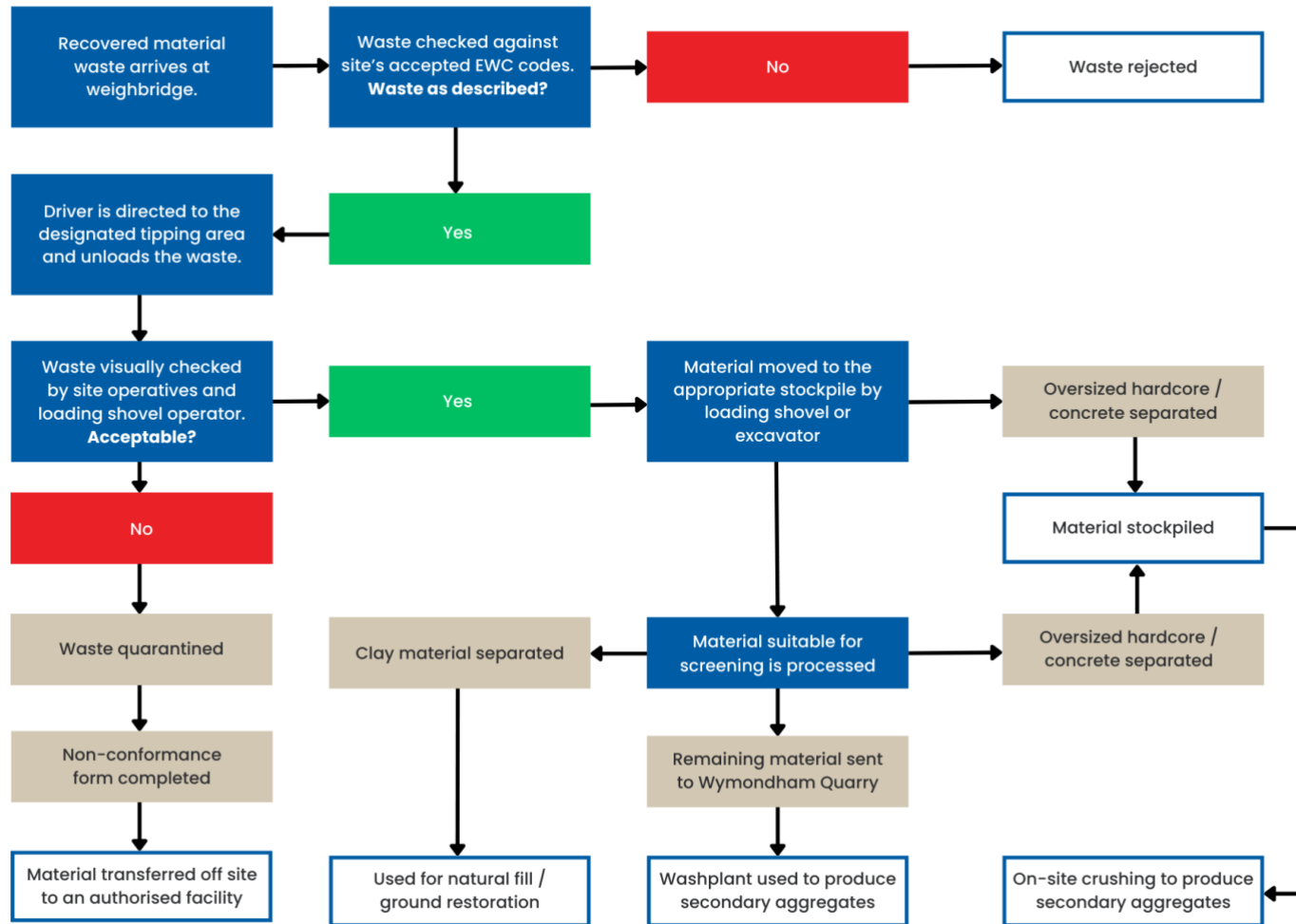
This approach ensures that waste accepted and processed always remains within scope of permitted activities from our Environmental Permits, Waste Carrier Licenses and operational controls.

The below flow charts visually represent how waste and recycling is processed on both sites:

Wymondham Quarry



Lakenheath Recycling Centre



COMPETENCE & TRAINING

We ensure that all personnel involved in waste management activities are competent for the tasks they undertake, through a combination of relevant experience, formal qualifications where required and active supervision on site.

Each site operates under their day-to-day control of a dedicated Operations Manager, who is responsible for waste acceptance decisions, permit compliance and the supervision of staff and contractors. This ensures that operational control and technical competence are maintained at all times.

Plant operators are trained and competent in the use of the equipment they operate, with CPCs cards or equivalent qualifications held where applicable. Operators work under site supervision and are expected to follow site rules, safe systems of work and operational instructions when carrying out processing activities.

Drivers hold the appropriate licenses and Driver CPC and receive site specific instructions relating to waste acceptance and site rules. Drivers are expected to challenge loads that do not match the agreed waste description and to raise concerns with site management where necessary.

All new starters receive a site induction before working independently. Inductions cover site rules, waste acceptance requirements and health, safety and environmental expectations. Competence is reinforced through ongoing supervision, informal briefings and day-to-day management.

Site management actively supervise operations and have the authority to stop work where unsafe or non-compliant conditions are identified. Unsafe or non-compliant behaviour is addressed as it arises, with incidents investigated and corrective actions implemented where necessary, including formal warnings where appropriate.

Competence is kept under review through routine observation and management oversight, following incidents or near misses and when changes occur to activities, plant or permit conditions. This approach ensures that training needs are identified and addressed as part of normal operations.

Certificates of Technical Competence (CoTC) are held by the following staff:

WAMITAB Holders			
Name	Qualification	Certification Number	Expiry Date
Ryan Holbrook	CIWM (WAMITAB) Level 4 Certificate in Waste and Resource Management	5277928	09/04/2027
Pav Myrcik	CIWM (WAMITAB) Level 4 Certificate in Waste and Resource Management	5298599	10/02/2028

ACCREDITATIONS & MEMBERSHIPS

Name	Expiry Date
FORS Gold	26/02/2027
Constructionline Gold	05/09/2026
Avetta	31/03/2026
MPA	06/02/27
RHA	31/03/26

LEGAL & OTHER REQUIREMENTS

Rory J Holbrook Ltd identifies and manages its legal and other obligations through practical operational controls, permit compliance, external accreditation requirements and active management oversight.

The waste management activities at the sites within scope operate under permits issued by the Environment Agency. Compliance with permit conditions is managed on a day-to-day basis by the respective Site Operations Managers, who regularly review permit requirements and carry out site compliance checks to ensure that activities remain within authorised limits.

Pre acceptance procedures, visual inspections, waste segregation controls and ongoing supervision form part of this compliance framework. Knowledge of permitted waste types and operational limits is held across the site teams, with overall responsibility resting with the Site Operations Managers.

Rory J Holbrook Ltd monitors relevant legal developments and regulatory expectations through a combination of:

- Environment Agency updates and correspondence
- Trade body engagement
- Accreditation scheme updates, including FORS Gold, Constructionline Gold and Avetta
- External professional advice where appropriate

This approach ensures that changes in legislation, guidance or industry standards are identified and assessed in relation to operational activities.

The Environment Agency carries out site visits in accordance with permit requirements. Where feedback or actions are identified, these are reviewed and addressed through site management and, where necessary, wider management oversight.

In addition to statutory requirements, the business maintains a number of industry accreditations and memberships. These schemes introduce additional compliance, safety and environmental expectations which are incorporated into day-to-day operations.

Overall responsibility for legal compliance sits with the Managing Director, supported by RH and PM and the wider management team. Compliance is treated as a shared responsibility across the organisation, with individuals expected to maintain control within their areas of responsibility.

CORRECTIVE, PREVENTIVE & IMPROVEMENT ACTIONS

We operate a practical approach to identifying and addressing corrective, preventive and improvement across its waste management activities.

Near misses and incidents are formally logged and reviewed. Where appropriate, corrective actions are implemented to prevent recurrence. This may include changes to working practices, additional supervision or reinforcement of site rules. Lessons learned are communicated to relevant personnel to ensure that improvements are embedded in day-to-day operations.

Toolbox talks are conducted as required and are delivered following the reporting of incidents or near misses. These sessions reinforce safe systems of work, highlight identified risks and ensure that staff remain aware of their responsibilities in relation to health, safety and environmental performance.

Improvement actions are primarily identified through routine site supervision, operational observation and management oversight. While improvement tracking is managed informally, actions are reviewed by site management and progressed as part of normal operational control. This ensures that issues are addressed proportionately and without delay.

Risk assessments form a key part of the preventative control process. Assessments are reviewed annually and are also completed prior to the introduction of new plant, equipment, activities or changes to permit conditions. This ensures that potential risks are identified and controlled before implementation.

We recognise that maintaining a high standard of compliance and operational performance requires ongoing attention. Corrective and preventive actions are therefore treated as part of normal site management rather than isolated events.

PERFORMANCE REVIEW

We regularly review the effectiveness of our waste management operations through regular management oversight and structured discussion at senior level.

Formal management meetings are monthly, and more frequently where required. These meetings are attended by the Managing Director and all managers and provide an opportunity to review operational performance, compliance, contracts, incidents and business priorities. While the agenda is operationally driven, matters relating to environmental performance, permit compliance, accreditations and risk management are routinely discussed as part of normal business review.

Incidents and near misses are considered as they arise, with corrective actions agreed and implemented where necessary. Compliance with Environmental Permit conditions is monitored at site level and escalated to management where appropriate. Accreditations and memberships, including FORS Gold, Constructionline Gold and Avetta are reviewed in line with renewal and audit cycles.

Annual reviews are undertaken in relation to Environmental Permit compliance, accreditation performance and the Environmental Management System. These reviews provide an opportunity to assess overall effectiveness, identify trends and confirm that operational controls remain appropriate.

Although management meetings are conducted in a practical and solution-focused manner, actions arising from discussions are followed up through normal management channels to ensure that issues are addressed and improvements implemented. This approach ensures that waste management activities are not reviewed in isolation, but as part of wider operational and strategic decision-making.

across the business. Below is a summary of achievements and objectives from January 2025 to December 2025:

	Objective Statement	Details
1	Improve efficiency of crushing, screening and stockpile management.	Review stockpile locations and processing sequences to minimise plant double handling. Optimise plant utilisation across both sites to reduce idle time and unnecessary fuel consumption.
2	Reduce environmental impacts associated with dust, mud and noise.	Maintain site road cleanliness with increased use of road sweeper. Continue to monitor site activities during adverse weather conditions and adjust operations where necessary.
3	Improve material recovery and product quality through operation of the washplant at Wymondham Quarry.	Improve the quality and consistency of recycled aggregate products through washing and separation processes. Monitor outputs from the washplant to assess improvements in recovery performance and product specification.
4	Mineral extraction	Continue to maximise use of site won mineral and excavated inert materials through screening,, crushing and reuse as engineering fill or recycled aggregates.
5	Land restoration	Ensure restoration materials are visually inspected and accepted in line with site waste acceptance procedures. Continue to utilise soils and inert materials for restoration works in accordance with permit and recovery plan requirements.

DATA SUMMARY & TABLES

A waste review for the period 1 January 2025 to 31 December 2025 confirms a 100% landfill diversion rate. Recycling performance, calculated in line with PAS 402 requirements is detailed in the tables below.

Landfill Diversion Rate
100%

Wymondham Quarry

Stream Name	Incoming Codes	Outgoing Disposal Code	Outgoing Recovery Code		Tonnes Received	Tonnes Disposed	Tonnes Recovered	Tonnage Difference	Proportion Removed	Recovery Rate	Tonnes Received	Tonnes Disposed	Tonnes Recovered	Tonnage Difference	Proportion Removed	Recovery Rate
Ferrous Metal	(R05) 170101 Concrete		(R04) 191202 Ferrous metal	Q1	875.74	0	867.74	8	99.1%	100%	5,196.56	0	5,164.56	32	99.4%	100%
				Q2	1,746.5	0	1,738.5	8	99.5%	100%						
				Q3	1,266.82	0	1,258.82	8	99.4%	100%						
				Q4	1,307.5	0	1,299.5	8	99.4%	100%						
Soil & Stones	(R05) 170504 soil & stones other than those mentioned in 17 05 03		(R10) 170504 soil and stones other than those mentioned in 17 05 03	Q1	5,404.84	0	5,404.84	0	100%	100%	18,489.9	0	18,489.9	0	100%	100%
				Q2	5,606.14	0	5,606.14	0	100%	100%						
				Q3	5,312.18	0	5,312.18	0	100%	100%						
				Q4	2,166.75	0	2,166.75	0	100%	100%						
Sold Aggregates	(R05) 170102 bricks (R05) 170504 soil and stones other than those mentioned in 17 05 03 (R05) 170302 bituminous mixtures (R05) 170101 concrete		(R13) 191212 Sold aggregates	Q1	20,280.83	0	24,418.57	-4,137.74	120.4%	100%	100,504.34	0	174,727.88	-74,223.54	173.9%	100%
				Q2	15,972.67	0	35,618.37	-19,645.7	222.9%	100%						
				Q3	39,022.63	0	73,428.25	-34,405.62	188.2%	100%						
				Q4	25,228.21	0	41,262.69	-16,034.48	163.6%	100%						
Mixed Municipal Waste	(R05) 170504 soil & stones other than those mentioned in 17 05 03		(R12) 20 03 01 Mixed municipal waste	Q1	3,286	0	3,270	16	99.5%	100%	69,122.98	0	69,058.98	64	99.9%	100%
				Q2	17,923.2	0	17,907.2	16	99.9%	100%						
				Q3	33,162.8	0	33,146.8	16	99.9%	100%						
				Q4	14,750.98	0	14,734.98	16	99.9%	100%						

Lakenheath Recycling Centre

Stream Name	Incoming Codes	Outgoing Disposal Code	Outgoing Recovery Code	Tonnes Received	Tonnes Disposed	Tonnes Recovered	Tonnage Difference	Proportion Removed	Recovery Rate	Tonnes Received	Tonnes Disposed	Tonnes Recovered	Tonnage Difference	Proportion Removed	Recovery Rate	
Ferrous Metal	(R05) 170101 Concrete		(R04) 191202 Ferrous metal	Q1	1,212.3	0	1,196.46	15.84	98.7%	100%	6,599.44	0	6,536.83	62.61	99.1%	100%
				Q2	2,195.04	0	2,176.79	18.25	99.2%	100%						
				Q3	1,050.8	0	1,027.33	23.47	97.8%	100%						
				Q4	2,141.3	0	2,136.25	5.05	99.8%	100%						
Material for Landscaping	(R05) 170504 soil & stones other than those mentioned in 17 05 03		(R10) 191212 other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	Q1	13,488.78	0	13,488.78	0	100%	100%	39,544.26	0	39,544.26	0	100%	100%
				Q2	11,648.34	0	11,648.34	0	100%	100%						
				Q3	6,124.34	0	6,124.34	0	100%	100%						
				Q4	6,282.8	0	6,282.8	0	100%	100%						
Soil & Stones	(R05) 170504 soil & stones other than those mentioned in 17 05 03		(R10) 170504 soil and stones other than those mentioned in 17 05 03	Q1	24,764.05	0	24,764.05	0	100%	100%	69,148.8	0	69,148.8	0	100%	100%
				Q2	14,876.28	0	14,876.28	0	100%	100%						
				Q3	18,794.99	0	18,794.99	0	100%	100%						
				Q4	10,713.48	0	10,713.48	0	100%	100%						
Sold Aggregates	(R05) 170102 bricks (R05) 170504 soil and stones other than those mentioned in 17 05 03 (R05) 170302 bituminous mixtures (R05) 170101 concrete		(R13) 191212 Sold aggregates	Q1	5,154.3	0	5,154.3	0	100%	100%	19,154.82	0	19,154.82	0	100%	100%
				Q2	2,188.82	0	2,188.82	0	100%	100%						
				Q3	5,932.8	0	5,932.8	0	100%	100%						
				Q4	5,878.9	0	5,878.9	0	100%	100%						
Mixed Municipal Waste	(R05) 170504 soil & stones other than those mentioned in 17 05 03		(R12) 20 03 01 Mixed municipal waste	Q1	4,623.98	0	4,620.24	3.74	99.9%	100%	29,382.34	0	29,359.6	22.74	99.9%	100%
				Q2	9,338.9	0	9,333.16	5.74	99.9%	100%						
				Q3	8,461.44	0	8,452.72	8.72	99.9%	100%						
				Q4	6,958.02	0	6,953.48	4.54	99.9%	100%						
Ash	(R10) 10 01 15 bottom slag ash and boiler dust from co-incineration other than those mentioned in 10 01 14		(R13) (Product) Sold aggregates	Q1	14,215.09	0	14,209.35	5.74	99.96%	100%	41,713.33	0	41,694.67	18.66	99.96%	100%
				Q2	11,217.84	0	11,213.62	4.22	99.96%	100%						
				Q3	8,140.2	0	8,136.32	3.88	99.95%	100%						
				Q4	8,140.2	0	8,135.38	4.82	99.94%	100%						