



**Annual Performance Report – 1st April
2025 to 31st March 2026.**

**Report Produce in line with PAS402:2025
standard.**

1. Scope of Reporting

Fresh Start Waste Services Limited (“Fresh Start”) have produced this annual report to provide transparency across its waste management activities and the steps it takes to divert waste from landfill. This report has been produced to meet the Publicly Available Specification PAS 402.

A Publicly Available Specification is a standardisation document that defines good practice for a product, service or process. PAS 402 is the Specification for performance reporting of waste resource management. This report meets the requirements of PAS 402 and sets out:

- a. How Fresh Start Waste Services Limited (Fresh Start) conducts specific waste resource management activities; and
- b. The material recovery rates it achieves.

There is no statutory requirement for Fresh Start Waste Services Limited (Fresh Start) to produce a report containing this information, or for Fresh Start to publish information in this format.

It is a significant change within this document that the content relates to PAS 402:2025. There are significant differences between PAS 402:2013 and PAS 402:2025. Where appropriate, references to both the 2013 and 2025 will be made clear.

The Senior Management Team would like to record their thanks to the Green Compass Scheme and to all the auditors and other contributors for the work they have done to update this important standard.

Fresh Start welcome the increased focus on energy recovery from waste, which in the absence of viable alternatives, and whilst the UK energy sector is still working to embrace new cleaner energy solutions, represents a significant route for the recovery of waste products.

2. Normative References

There are no normative references in the new PAS 402:2025 standard.

3. Terms and Definitions

All of the terms and definitions used in this report are as specified in the Publicly Available Specification (PAS) 402:2025. There were many terms in the 2013 standard that are no longer defined in the new standard. Where new definitions have not been created, the terms used continue to meet the 2013 standard. Where new terms and conditions have been introduced in the new standard, the terms and definitions are in line with the new standard.

For example, corrective actions under the new PAS 402:2025 standard reflect the need for improvements to be made, but also for actions to be taken to prevent a future recurrence. The new definition of ‘end of waste’ represents that moment when waste becomes a resource.

4. Fresh Start Waste Commitment

Fresh Start is actively working towards zero carbon, zero to landfill, and the development of the circular economy. This report, which has been constructed to the recognised standard PAS 402 contains information that explains how we do that:

- Scope of Operations.
- Client Relationships.
- Impacts and Risks.
- Operational Management.
- Competence.
- Legal and Other Requirements.
- Corrective and Preventative Actions, Improvement Actions.
- Performance Review.

This report will be made publicly available and shared with customers to demonstrate our commitment to the standard.

Fresh Start Waste Services Limited are proud to hold PAS402 Certification and encourage waste producers and waste processors to demand the same level of diligence, openness and transparency, to create greater informed decisions about waste disposal, and to provide a level playing field for the waste sector. We welcome the requirement within the new standard to declare where waste is not going to PAS402 .

5. Scope of Operations

- a. Fresh Start is a family-owned Northwest England based Waste Company, serving the northwest Communities of Greater Manchester, Cheshire, Merseyside, Lancashire, and South Cumbria.

Fresh Start is licenced to operate waste activities under the following permits and licences:

Environment Permit Number:	<u>BB3409LE</u>
Waste Management Licence Number:	401349
ABP Handling Licence Number:	<u>44/862/8120/ABP/STO</u>
Waste Carrier's Licence Number:	<u>CBDU228552</u>
ABP Carriers Registration Number:	U1187844

- b. Under the Environmental Permitting Regulations, the Company operates as Fresh Start Waste Services Limited.

The site name is the Fresh Start Recycling Centre, and that centre is located across Units 4 and 5 Hilton Square, Bolton Road, Swinton, Salford, Manchester, M27 4DB. Under the Waste Carrier's Licence, the Company is licenced to operate as Fresh Start Waste Services Limited, a Waste Carrier, Broker, and Dealer – Upper Tier, through its Head Office address at Scott House, 114 Higher Green Lane, Astley, Greater Manchester.

- c. Between the 1st April 2025 and the 31st March 2026, the Fresh Start Recycling Centre was permitted to treat and transfer a maximum of 75,000 tonnes of non-hazardous household, commercial and industrial waste through a SR2008 No3 permit. [SR2008 No3 - 75kte](#). Hazardous wastes are not permitted to be processed on the site. On the 1st January 2025, SR2008 No3 was superseded by [SR2022 No4 - 75Kte](#) standard rules permit SR2022 No 4: non-hazardous waste recycling with asbestos, hazardous batteries, cable and WEEE storage
- d. Fresh Start Waste Services Limited and the Fresh Start Recycling Centre do not operate any exempt waste operations.

e. Full Planning Permissions were granted by Salford City Council as follows:

Reference: [15/66033/FUL](#) 5, Hilton Square, Pendlebury, Swinton, M27 4DB

Change of use from B2 (General Industry) to recycling depot – 08/10/2015

Reference: [17/70214/FUL](#) Hilton Square, Pendlebury, Swinton, M27 4DB

Proposed new canopy over recycled glass storage bay – 15/09/2017

Reference: [21/78065/FUL](#) Hilton Square, Pendlebury, Swinton, M27 4DB

Retained use for waste recycling activities, including relocation within the site of the sorting/picking line and storage areas/bays and proposed new roof structures over external storage areas/bays – 11/11/2021.

Update:

During the year, Fresh Start Waste Services Limited acquired Unit 3 Hilton Square, Pendlebury, Swinton, M27 4DB. Although a process of pre-planning has commenced, and we have received feedback from the council, no planning application has yet been made for change of use, and there is no permit in place for the purposes of processing waste.

- f. Waste Operations take place out of Units 4 -5A and 5B Hilton Square, Pendlebury, Swinton, M27 4DB. Unit 3 is outside of the scope of this report.
- g. The total quantity of waste that can be accepted at the site is 75,000 tonnes per year. This limit is not segregated by waste type
- h. There are no exclusions from the scope of this report.

6. Client Relationships

Two Types of Client

Fresh Start Waste recognises that it has two types of clients – the waste producers (trade waste customers that purchase waste collections such as shops, take aways and industrial premises) – and the waste receivers (commodity customers such as cardboard recyclers that receives sorted, processed, bulked, bailed, loaded, and forwarded commodities).

Trade Waste Customers

Understanding Customer Requirements

Fresh Start Waste Services Limited (Fresh Start) has a team of 6 Business Development Managers and one Commercial Manager (providing dedicated support to the construction and facilities management sector). The team is headed up by our Sales & Marketing Director.

The Sales Team works with customers to understand their needs and to specify the type of contract they need.

Free Waste Audits

We provide a free waste audit, analysing existing waste management practices and identifying areas for improvement.

The Fresh Start Web site

We provide help and support to our clients to help them to understand their needs better. Our website provides a wide range of information and tools to help customers to understand more about our services: [Waste Services](#).

For much of the period 2025-26, the industry was preparing for Simpler Recycling which became law on the 31st March 2025 and then the bedding in of the legislation into day to day operations. In readiness, we provided a tool to help waste producers to consider their obligations and the impact of the new legislation of the new legislation on them. Since the law came into force, we have updated our website. You can find out more information about Simpler Recycling here: [Simpler Recycling](#).

Tailored Waste and Recycling Collection Service

Based on the audit findings, Fresh Start will recommend and implement a waste and recycling collection service tailored to your business needs. This ensures that your waste management practices are not only compliant but also optimised for environmental best practices.

Creating the Right Contract for the Right Services

The Sales Team are supported by two Customer Service Administrators who are responsible for setting up customer contracts, a Customer Service Team headed up by a Senior Customer Service Supervisor to help customers to get quick answers to any questions they might have, and a part time

Query Resolution Administrator to address any specific issues that cannot be quickly remedied. Our Customer Service Team are managed by a Customer Service Manager.

We use paperless e-forms to engage new customers reducing our and their carbon footprint and ensuring that we are both agreeing to the right solution.

Commodity Customers

We supply the following commodities:


- Aggregates for construction (hardcore and bricks, non-hazardous soils, plasterboard and mixed construction wastes).
- Metals - Loose Light Iron, Aluminium (Cans and other), Household cables, and other metals.
- Cardboard and mixed papers.
- Glass.
- Fines and other mechanically sorted materials.
- Biodegradable kitchen waste.
- Wood.
- Plastics (sorted by type).
- General waste for further processing (reprocessing) or for Waste to Energy.

The Waste Hierarchy

We are proud to confirm continuing relationships with businesses that work with our customers to prevent non-waste from entering the waste stream.

Preventing Waste

Fresh Start will engage with customers to prevent materials from becoming waste at the start of the process. We work with a range of organisations to divert materials from waste processes. These include:



Too Good To Go – a certified B Corp social impact company, on a mission to inspire and empower everyone to fight food waste together. When we work with food businesses, we encourage them to divert food which is still safe to eat from waste, and to organisations and individuals that can use it: [Too Good To Go](#).

The **Wood Street Mission** and encourages customers and employees to donate materials that may be of use to individuals and organisations that can use those materials in the communities we serve: [Wood Street Mission](#).



Bulky Bob's, the 'End Furniture Poverty' charity. This partnership focuses on a vital reuse project: to reuse furniture and combat poverty. They aim to provide a second lease of life to reusable furniture: [End Furniture Poverty](#).

Fresh Start, collaborated with Bulky Bob's, and Manchester's Holiday Inn Hotel to divert 61 mattresses to people in furniture poverty: [Holiday Inn](#).

In 2025, we started a new relationship with The Furniture Recycling Group who recycle mattresses.



Arrangements for Collecting Waste

Contractual Arrangements address issues like types of bins (cardboard/dry mixed/food/glass/etc.), sizes, etc. Once the contract is agreed, arrangements are made for colour coded bins of the correct shape and size to be shipped to customer premises in readiness for collection.

The Fresh Start sales team ensure that employees at customers premises are trained on which bin is used for which waste type.

Sometimes it's not the client, but their customers, that need help. Fresh Start aids Yotel Hotels in improving recycling efforts through customized waste management solutions. Internal containers and color-coded bags ensure proper recycling, reducing environmental impact. [Yotel Case Study](#)

We provide different types of waste containers: [Waste Containers](#)

- Wheeled bins
- Commercial skips
- Front end loaders
- Roll-on-off containers, and
- Domestic skips
- Compactor solutions

We offer a range of different sizes for each of the options described above – and our wheeled bins range from 240 litre to 1,100 litre capacity: [Wheeled Bins](#). Our bins are colour coded to help our drivers when they are out on collections. These include lidded food bins to reduce the risk of vermin infestation.

We recently worked with a large client in Manchester and Liverpool with whom we shared values to reduce waste output and maximise recycling efforts. Key to our success in winning this contract was the supply of plastic bins made from recycled materials, and the use of split body (multi-compartment) vehicles to improve collection efficiency: [Bruntwood Case Study](#)

Fresh Start uses multicompartiment top loading vehicles to collect and separate waste streams like food and glass in one truck, reducing carbon emissions by 25%. All waste is collected in Euro 6 compliant wagons, ahead of Clean Air Manchester's requirement, with a commitment to phase out diesel wagons upon feasible electrification of HGVs. [Use of Multicompartiment Vehicles](#).

We employ delivery drivers to deliver bins to customer premises, and work with customers to ensure safe access. Once the bins have been delivered to the customer's premises, our waste collection routes are updated to ensure that waste is collected by the right vehicle on the right day. If the collections are time sensitive, this information is also added to our route information packs.

Our waste collection drivers are issued with a Personal Data Assistant (PDA) which identifies what work needs to be completed, in what order. Drivers use the same PDA to record completed work. If Drivers have any problems or concerns, they can ask Transport Supervisors for help, and Transport Supervisors can also track Driver progress throughout the day.

If the Customer has any concerns about a collection, they can contact our dedicated team of Customer Service Administrators to help to resolve any queries or concerns they may have.

Collected waste is shipped to our £750k waste recovery facility in Swinton which can treat and transfer up to 75,000 tonnes of domestic, commercial, and industrial, non-hazardous waste. [Efforts to Recover More Waste.](#)

The work we are doing on Simpler Recycling demonstrates how we are working today to support the needs of customers tomorrow. This same awareness helps us to plan and enables the Senior Management Team to discuss plans in regular management meetings, or at Board level as appropriate.

7. Impacts and Risks

How the organisation identifies, records, assesses and controls risks and impacts

There are fundamental risks inherent in the waste sector, and Fresh Start is no different.

The main risks can be described broadly under the following headings:

- Environmental Risk (including climate change) but broadly under the auspices of a failure for us to work in accordance with the requirements laid down to use by the regulators which in our case, are The Environment Agency, Salford City Council, and the Animal and Plant Health Agency. These risks are predominantly managed under our ISO14001 system.
- Health & Safety risks predominantly managed under our ISO 45001 systems.
- Quality Risk (which relates to waste suppliers and our waste receivers and our relationship with them).
- Supplier Accreditation
- Business and Commercial Risks, which comprise of the following:
 - Corporate Social Responsibility
 - Cyber-risk
 - Equal Opportunities and Dignity at Work
 - Modern Slavery
 - Vehicle Operations
 - Prevention of Tax Avoidance
 - Anti-Bribery and Corruption

- Business Continuity

Environmental Risk

Climate Change

A requirement of the new PAS 402:2025 standard is a specific consideration of the impact of climate change. The main impacts of climate change are threefold:

- In the short term, periods of extreme weather such as extended periods of dry weather (increasing the risk of fires) and heavy rain (increasing the risk of localised flooding) have the potential to curtail or limit some of our operations. We operate routes out of two depots to reduce the risk of fleet difficulties and have the ability to divert waste to alternative centres if for any reason the MRF is unable to operate for any reason.
- Government policy in relation to climate change appears at times, to be poorly thought out, unclear, and short sighted. We have been affected in the past when decisions to close multiple energy from waste facilities simultaneously has created a risk that we would see a build up of general waste at the MRF. Through good management and effective business continuity planning, we have been able to divert waste to other licenced waste processors
- In the longer term, unless there is a greater recognition of the value and importance of the waste sector to overall climate change, any serious attempts to achieve full waste recovery, including fresh thinking on those materials currently going to energy from waste route (particularly incineration), it is unlikely that the UK will ever be able to play its part in driving down global climate change.

The Environment Agency (EA)/Salford City Council

The site operates to a 'Standard Rules' Permit issued by the Environment Agency. SR2022 No4 - 75Kte. Please refer to section 11. Corrective actions, preventive actions and improvement actions for further information.

The Animal and Plant Health Agency (APHA)

The site was Approved as a food waste and transfer station on the 17th May 2019, and stores Category 3 (low risk) animal by products (food waste). The site has established effective processes for the management and control of food waste and has a good relationship with the Regulator based on a history of good practice in the control and management of food waste. APHA typically visit the site once a year.



ISO14001:2015 Certification

The business is Certified to ISO14001:2015. At the last external surveillance audit in December, 2025, there were no major or minor non-conformities, and no identified opportunities for improvement. We maintain site records and report on site activities in accordance with the term of our permit. If we were to have a notifiable incident, we are required to report that to the Environment Agency.

Emissions

The site has an emissions management plan which has been developed based on best practice to control emissions from the site and operates a daily checks process to ensure the site is operating within the terms of the Permit. The site uses odour suppression systems in place to reduce the spread of odour beyond the site boundaries. These systems are checked daily as a part of the site management plan. to ensure that they work correctly. We monitor equipment to identify noise or vibration issues which could cause a nuisance for our neighbours and our employees. If we receive any complaints, we act swiftly to address them. The few complaints we receive are all managed and monitored via our improvements log.

Health & Safety



ISO45001:2018

The business is Certified to ISO45001:2018. At the last external surveillance audit in December, 2025, there were no major or minor non-conformities, and no identified opportunities for improvement.

Recycling Activities

Our Material Recycling Facility employs a range of Plant Operatives, Recycling Operatives, and Traffic Management Operatives. All employees undergo relevant training in equipment use, risk assessments, and safe operating procedures before being allowed to operate on site.

We have Risk Assessments and Safe Operating Procedures for all our activities including:

- Operation of Plant and Equipment
- Handling unsafe materials
- Marshalling Vehicles

We have a training matrix for our managers and staff. We use external training and certification, including the MRF Manager's WAMITAB, and Transport Managers CPC, we recognise the National Plant Operators Registration Scheme for all mobile plant operations, and use external trainers

for safety critical training such as Fire Marshall and First Aider. NPORS records are on the notice board in the MRF Main Office. A Training Matrix is stored in a shared drive and is routinely updated.

We conduct an annual occupational health survey of our employees at the Material Recycling Facility and have carried out a range of occupational exposure assessments to ensure that our employees are not exposed to invisible hazards.

Quality Risk



The site is Certified to ISO9001:2015. Managers (Duty Holders) are responsible for ensuring their employees work in accordance with the Quality Management System.

The Quality Management System is split into sections, and each Section has its own duty holder. Internal Audits are carried out twice yearly by an independent manager (not the Duty Holder) to ensure that the processes are being followed correctly.

The Duty Holders validate the management system each year to ensure that the processes are fulfilling business needs and are providing the correct results. An Annual Management System Review involving all the Directors ensures that at a strategic level, the business has the right systems in place.

At the last external surveillance audit in December, 2025, there were no major or minor non-conformities, and no identified opportunities for improvement. There were several positive observations recognising examples of best practice.

Supplier Accreditation Schemes



The business goes through formal Supplier Certification with a 'Safety Schemes in Procurement' Approved Certification Body every year. The Certification demonstrates Fresh Start has health and safety controls in place. We have been Certified by Safe Contractor for 16 years. You can check our Certification here: [SSIP Portal](#). Our Company name for SSIP is Fresh Start Waste Services Ltd.

We continue to hold Constructionline accreditation. This standard demonstrates that Fresh Start meets industry and regulatory business standards, including health & safety, environmental obligations, quality management, equal opportunities, and anti-bribery and corruption policies. Being accredited elevates a company's reputation as a trusted supplier.



Business/Commercial Risks

Corporate Social Responsibility

Our Corporate Social Responsibility commitment sets standards of business conduct, sets standards of corporate governance, guides recruitment and development, sets standards for the environment, carbon footprint, human rights, equality and diversity, impact on society, ethics and ethical trading, and on our relationships with our supply chain.

Cyber-Risk and General Data Protection Regulations

Fresh Start is Cyber-Essentials Certified. Computer users receive regular training on cyber-safety. The Company is registered with the Information Commissioner's Office for the Processing of Information. ([ZA457272](#)).

Equal Opportunities and Dignity at Work

Fresh Start is committed to equality of opportunity, not just because we are legally obliged to do it, but because we recognise the breadth of diversity across our customer base, and the value employees from different backgrounds bring to our business.

Modern Slavery

Fresh Start recognises that not every UK waste business upholds the standards that it should do in respect of Modern Slavery. We have a clear policy that is communicated to all employees, and which clearly and unequivocally sets out our expectations.

Vehicle Operations

Fresh Start Waste Services Limited are licenced to operate 55 vehicles. Licence Number: [OC1062693](#). The Business uses a computerised system to ensure vehicles are roadworthy, and that services and MOTs are scheduled and executed in a professional and timely manner.

Prevention of Tax Avoidance

Fresh Start recognises that not every UK waste business upholds the standards and systems necessary for the prevention of tax avoidance. We have a clear policy that is communicated to all employees, and which clearly and unequivocally sets out our expectations.

Anti-Bribery and Corruption

Fresh Start recognises that there is temptation in every industry, and that practices in the waste sector have not always been as professional as they should have been. We have a published policy on bribery and corruption which recognises best practices and which does not permit our employees to engage in bribery or corruption practices, either as the instigator or the beneficiary.

Raising a Concern 'Whistleblowing' Policy

Fresh Start operates a Raising a Concern 'Whistleblowing' Policy to provide an opportunity for employees to raise concerns in good faith. The Policy ensures a fair and reasonable investigation into events and/or behaviours, whilst enabling the business to address genuine matters of concern.

Impacts

Adopting a professional, environment conscious, approach to business has enabled us to work with some of the greatest names in the North West, but one thing they all have in common is their commitment to work with us for the good of the environment. Notable clients include Duerrs Jams, the Corn Exchange, Bruntwood Circle Square, Joseph Holt Pub Group, Kampus, DieCast Manchester, Native, HM Prisons, RHS Bridgewater, and more. Each case highlights tailored services improving recycling and sustainability. [Case Studies](#)

Business Continuity

The Business Continuity Plan identifies significant risks and sets out a plan for addressing the risks if and when they occur. The main risks identified are:

- Building Fire (Office, Depot, or MRF).
- Power/Utilities Failure.
- Computer Failure.
- Contaminated Waste.
- Unlicensed Waste Stream.
- Plant Failure.
- Supplier Failure.
- Site access.
- Loss of Labour / Competence.
- Extreme Weather.
- Major Accident or Incident (Vehicle).
- Major Accident or Incident (MRF).
- Spillage (truck failure).
- Pollution event (MRF).
- Fire.
- Terrorist Attack or Vandalism.
- Act of Vandalism.
- Market Failure.
- Market Failure.
- Loss of Technical Competence.
- Loss of Insurance Cover – Fleet.
- Loss of Insurance Cover – Buildings.
- Loss of Insurance Cover – Liability.
- Hazardous Waste Event (on site).
- Pandemic.
- Legal Changes.

Every incident is unique, and that is reflected in our Business Continuity Plan.

We reviewed our Business Continuity Plan following our PAS 402 report production last year, and added additional risks.

How the organisation reviews and audits risks and ensure controls are suitable and sufficient

Operations, Quality, and Business Risk

The Board reviews the Risk Register at Quarterly Board Meetings and adds, updates, or removes risks in responses to changes in the environment. The management team meets annually to review its Management Systems and to ensure that it is fulfilling the needs of the business. This review considers the content of the Management System and the results of half yearly Internal Audits, as well as those conducted by regulators.

We review many of our policies annually, including Health and Safety, Environment, Quality Management, Corporate Social Responsibility, Carbon reduction, Cyber-risk, Equal Opportunities, Modern Slavery, Vehicle Operations, Prevention of Tax Avoidance, and our Raising a Concern (“Whistleblowing” Policy).

We receive monthly updates about forthcoming legislative changes, and organise actions to ensure that we continue to comply or exceed our legal requirements. At Quarterly Board Meetings, we review our performance in relation to significant risks and agree actions. Actions are tracked through regular Management Meetings.

Operations and the Environment

Fresh Start Waste is very proud of its performance as a good neighbour to local residents surrounding the plant. This requires an approach that goes beyond legal obligations and is reflected in the low level of environmental incidents and complaints received. We are also subject to regular and routine scrutiny from regulators, although, and again because of our good record, external environment audits tend to take place annually.

The details of our permit are readily available to all managers and act as a point of reference for what they can and cannot do. Lastly, but not least, we conduct daily site checks and act quickly to address concerns.

Operations and Safety

The main pieces of legislation that apply to us are the Health and Safety at Work Act and The Management of Health and Safety at Work Regulations, but we are also required to be compliant with a large amount of subsidiary legislation including The Construction (Design and Management) Regulations, The Control of Asbestos Regulations, The Workplace (Health, Safety and Welfare) Regulations, The Provision and Use of Work

Equipment Regulations, The Control of Noise and the Control of Vibration at Work Regulations, The Control of Substances Hazardous to Health Regulations, The Lifting Operations and Lifting Equipment Regulations, The Working Time Regulations, and many more.

We conduct routine assessments to ensure that we are managing risks effectively and go beyond our legal requirements. This culminated in Fresh Start Waste Services achieving CERTIFIED Great Place to Work™ recognition in November 2025.

The Waste sector traditionally has a poor record when it comes to Health & Safety. We are proud to have a record of no HSE Improvement or Prohibition Notices, no Enforcement Notices, and no Prosecutions.

We have annual visits from our Buildings Insurer and have installed a BS5839-1 L2/P2/M compliant fire system which exceeds the fire safety requirements laid down. The detection system provides both early detection and increased protection for our employees.

8. Operational Management

a. How the organization defines the roles and responsibilities it needs to conduct its business

At Fresh Start, all our employees work to Job Descriptions and Safe Operating Procedures.

The Depot Manager oversees all operational aspects of our Material Recycling Facility. The role ensures production/recovery targets are met, with a focus on lean processes to drive the performance of the MRF operation, and ensures Health, Safety, Quality, and Environmental Compliance standards are adhered to across all areas of the site.

Plant Operatives, Recycling Operatives, Traffic Marshalls, and the Weighbridge Operator, all report to the Processing Operations Manager. This team ensures that waste is correctly processed through the site.

b. How the organization maintains control of waste within the organization's custody

When our collection vehicles are out on the road, our employees inspect loads before the waste is collected. This is not an activity that is supervised, and it is not always possible to ensure that loads conform to standards at the roadside. When a wagon arrives on site, its load is identified, it is marshalled to the weighbridge for recording and then marshalled to a bay for the unloading of materials.

When a wagon arrives on site, its load is identified, it is marshalled to the weighbridge for recording and then marshalled to a bay for the unloading of materials. Materials either go in their own bay directly, or in the case of mixed loads, they go to a pre-sorting area, before they are picked.

- Wood.
- Paper and Card.
- Biodegradable kitchen waste.
- Green waste.
- Glass.
- Construction & Demolition .
- Dry Mixed Recycling (cardboard, textiles, paper, plastics, etc.)
- General Waste.
- Other materials.

Waste is always deposited at the front of bays to provide an opportunity for waste audit to ensure waste quality. Site Staff are responsible for checking incoming materials to ensure that they are not contaminated.

- Contaminated loads are rejected if they contain hazardous waste, or if they contain materials we are not licenced to process (powders, liquids, etc.).
- Contaminated loads with materials we are licenced to process are accepted but are processed – for example wood in a skip of construction hard core.
- Once reviewed, the load is then transferred into storage using a Loading Shovel.
- In some cases, waste stays in storage until it is sufficiently bulked for onwards despatch, for example food, glass.
- In other cases, it is moved through a process before despatch:
 - Dry mixed recycling travels over a picking line where materials are sorted and moved into separate storage areas.
- Cardboard and plastic is processed through a bailer, before being shipped to waste processors.

In October 2024, the new Sampling Regulations were introduced by the government. The [Environmental Permitting \(England and Wales\) \(Amendment\) Regulations 2023](#) required waste materials facilities to register with the government (which we have done), conduct waste input and output sampling, and provide quarterly reports to the government (which replace the previous quarterly reporting methodology). Fresh Start have engaged the services of a third party to conduct the sampling activity, partly to ensure independence of reporting, and partly to reduce risks associated with glass handling at the Swinton site.

c. How the organization identifies the operational resources it needs to conduct its business and how it maintains control of these operational resources

Sufficient resources are provided to ensure materials are processed in accordance with Health, Safety, Quality and Environmental Compliance Standards. Resource requirements are set out in the annual budget based on forecasted processing volumes.

Resourcing requirements include numbers and working hours of employees, as well as equipment to process materials. Any variances from the budget would be discussed in a fortnightly Senior Management Team Meeting, and variations agreed as required. In previous years, additional resources have been approved to meet needs beyond forecast volumes.

d. How the organisation ensures its waste operations remain within the maximum capacity of operation for each of the permitted waste operations

The Senior Management Team receive a daily tipping report which shows the amount of waste processed that day and the tonnage remaining on the site permit. At the present time we are well within permitted waste limits.

Total	Mixed Recycling	Plastics	Refuse	Wood	Tot
1.76	209.64	47.48	113.89	17.70	1.61

e. Where there is more than one transfer of waste, what steps are taken to prevent information on waste (e.g. type and mass) being lost or inaccurately reproduced

Information is recorded onto our live computer system at the point that waste is received and when materials are forwarded on to the next step in the supply chain. These are subject to regular checks. For example, when waste arrives, one of our operatives will conduct a review of the waste and update the information on a tablet computer. His entries automatically update information saved on our computer systems.

f. How the organization controls the waste it generates

As a waste business, we enforce the standards we expect from our customers on our own staff. This means that employees are expected to segregate waste at source. We do not have waste bins at employee desks. We only have shared bins with the correct labels. Waste is collected from sites and is recorded appropriately.

g. How the organisation controls risk from the use of plant and machinery

This is a new section added under PAS 402: 2025.

Equipment is selected based on suitability for both the work being undertaken and the environment in which it operates. In some cases, historic equipment has been disposed of or quarantined because it was unable to fulfil its purpose safely.

All sites are audited and the list of equipment updated to include those needing inspection by law and by good practice.

All employees are trained to use the equipment safely and effectively (there is more information set out in section 9 Competence below).

9. Competence

a. Key Tasks

As well as a Processing Operations Manager, responsible for the day to day activities of the facility, our Material Recycling Facility employs a range of:

- Plant operators driving hydraulic 360 rotating selector grabs, a loading shovel, telehandler, and fixed plant on site (bailer).
- Recycling operatives sort materials on our conveyor 'picking line' for onward transit as commodities.
- Traffic Marshalls and Weighbridge Operators are responsible for the safe flow of traffic onto and around the site, and for minimising congestion at our boundaries.

Key Tasks are described in Job Descriptions. If there is a safety critical aspect to the role, additional information is provided in Safe Operating Procedures.

b. Knowledge, awareness, understanding and skills.

As well as setting out the job purpose and key responsibilities, the job descriptions set out required qualifications, skills, knowledge, and experience that are essential and desirable for the organisation. Operational employees are required to undergo externally accredited training in equipment use, and training in Company Risk Assessments and Safe Operating Procedures before being allowed to operate on site.

c. Assign tasks to people and notify them of their roles and responsibilities

When we recruit, we ensure that this information is clearly displayed in job advertisements, and the Hiring Manager scrutinises candidates to ensure that they have the necessary knowledge, skills, experience, and abilities to perform the role.

Employees are hired with a probation period during which time we (and they) have an opportunity to assess their performance in the role and to establish whether the role is right for them. During this period, employees receive a higher level of supervision.

Over the last four years, we have moved from a replace to refill recruitment model to one based, as much as possible, on promotion from within. This ensures that our role holders are gaining a wider understanding of the business and can focus on the work they need to do to support other team members.

d. Ensuring our team can perform the tasks expected of them

All managers and staff undergo regular performance reviews to identify strengths and weaknesses. Where appropriate, gaps in knowledge, skills, experience and ability are addressed through training. A key element of this process is our commitment to the National Living Wage – this helps us to ensure that we retain talent, and our commitment to develop employees so that we can promote from within the business.

e. Provide training where employees do not meet the detailed task requirements

We invest heavily in externally accredited training (Wamitab, Fleet Managers CPC, NPORS, St John's Ambulance) for our employees and try to promote from within to ensure that skills learned in one part of the business are retained when employees take up new roles. We have high levels of engagement and low levels of employee turnover in the Recycling facility.

f. Review the need for additional training

We track information on numbers of employees holding professional qualifications like WAMITAB, and operational certificates like NPORS, and fund training for employees to achieve qualifications. Training information is held on a training matrix which is updated to reflect training completed and staff changes.

10. Corrective actions, preventive actions and improvement actions

We record accidents, audit non-conformances, audit observations, change requests, complaints, compliance requirements, customer complaints (escalated), employee engagement opportunities, environmental concerns, fleet incidents, improvement ideas, near misses, non-conformances, service delivery issues, site issues, supplier complaints, training requirements, and vehicle incidents on a management system that enables us to identify and manage actions. The Company undertakes a Management Review annually as a part of its commitment to ISO 9001, ISO 14001, and ISO 45001.

Environment Agency Corrective Actions Report

The site had an unannounced visit from the Environment Agency on the 18th November 2025. The Officers recorded the following observations:

- A zero score was recorded with no comments, confirming that the Principle 5, suspension of scoring is still in place until, May, 2026.
- A permit application has been duly made and we are awaiting it to be issued, which will allow us to move all operations, indoors in a new purpose built building.

Note: Fresh Start Waste Services Limited confirms that no enforcement notices, prosecutions or formal regulatory actions were taken against the business during the reporting period 1 April 2025 to 31 March 2026.

Improvements

During the last PAS402 audit, there were some recommendations made to improve site organisation, safety, and compliance. There were a number of areas that could be improved. Actions were taken immediately to improve these areas. These will improve significantly when Unit 3 comes into operation. In the meantime, the team are working hard to maintain the site in good order, with materials stored in the right place to ensure the most effective throughput of materials through the facility.

Senior Management Approval (Clause 4)

This Annual Report has been prepared in accordance with PAS 402:2025 (incorporating Corrigendum No. 1) and is approved by the senior management team of Fresh Start Waste Services Limited, in accordance with Clause 4 of PAS 402:2025.

Signed: *Ben Entwistle*

Position: Head of Operations Date:25/05/2026

11. Performance Review

11.1 Performance summary

The Annual Report shall include the following in accordance with Table 1 and Clause 12:

Throughput of Waste in tonnes from 1st April 2025 to 31st March 2026

- a) Total waste tonnages in: the report shall record the mass of waste received by all sites within the scope of the report for the whole 12 months of the reporting period.
- b) Total waste tonnages out: the report shall record the mass of material (both processed and unprocessed) that has left all sites within the scope of the Annual Report for the whole 12 months of the reporting period. Where applicable, total waste out shall include:

	April – June 2025	July to September 2025	October to December 2025	January to March 2026	Total
Total Waste Received (Tonnes)	16,065.795	18,258.163	18,232.852	18,141.710	70,698.520
Total Waste Removed (Tonnes)	15,721.560	18,853.422	18,858.890	18,392.076	71,825.948

1) end of waste materials (**3.6 end of waste** end of waste is a formalized process that mandates the use of a specified product or equivalent to verify that a material has ceased to be waste, and will be recovered or recycled as a resource that directly replaces the use of raw materials);

Total Waste Reused and Retained	0	0	0	0	0
---------------------------------	---	---	---	---	---

2) waste reused and retained on the waste management organization’s site(s), within the scope of the Annual Report, e.g. for engineering purposes and/or any other recovery or reuse on site

Total Waste Reused and Retained	0	0	0	0	0
---------------------------------	---	---	---	---	---

3) material transferred for recycling and/or recovery; (**3.7 energy recovery** operation which converts the organic fraction of waste materials into a form of usable energy NOTE Examples of usable energy, include, but are not limited to, heat, electricity or fuel through combustion, gasification, anaerobic digestion, composting activities).

Total – Recycling	7,573	11,461	12,606	12,855	44,495
Total – Energy Recovery	8,148	7,393	6,253	5,537	27,331

4) material transferred for disposal (2025: **3.4 disposal** operation aimed at getting rid of waste with clear intent to discard, 2013: **2.7 disposal** operation which is not recovery even where the operation has, as a secondary consequence, the reclamation of substances or energy [European Communities Directive 2008/98/EC on waste [4], Article 3(19)]

NOTE A list of waste operations that may lead to disposal is given in European Communities Directive 2008/98/EC [4], Annex I.

Total Waste Reused and Retained	0	0	0	0	0
---------------------------------	---	---	---	---	---

c) Landfill diversion rate and overall material recovery rate: The report shall record the waste management organization’s landfill diversion and material recovery rate, in accordance with the requirements of Clause 12, as a percentage to the nearest whole number over four consecutive quarters within the 12-month reporting period.

Landfill diversion (material recovery) rates – during the period, no materials were sent to landfill.

Total diverted from landfill (tonnes)	15,721.560	18,853.422	18,858.890	18,392.076	71,825.948
Total diverted from landfill (%)	100%	100%	100%	100%	100%
Overall material recovery rate (%)	100%	100%	100%	100%	100%

We are required to state that landfill diversion and material recovery rates are not verified where any or all materials are sent to an organization that does not conform to the requirements of PAS 402. As Fresh Start Waste Services Limited is the only Northwest England based waste company to hold this certification, it is not yet possible for Fresh Start Waste Services to make any other declaration.

e) The mass, in tonnes, of any stockpiles of processed or unprocessed waste held by the organization at the start and at the end of the reporting period.

Stock Levels

	Opening 1/4/25	Closing 31/3/2026
Stock (tonnes)	180	301.500

Notes

- Dates coincide with the dates for completion of Environment Agency Quarterly Returns.
- Minor variations in reporting are caused by differences in stock levels on site, changes to moisture content, and other seasonal factors.

12. 11.1 Performance Summary (Table 1)

The following table presents the performance summary for the reporting period 1 April 2025 to 31 March 2026, in accordance with Table 1 of PAS 402:2025.

Performance Summary	Total tonnes
Total material inputs this period	70,699
Waste used/retained on site this period e.g. for engineering purposes	0
Waste remaining on site at end of this period (unprocessed)	265
Waste remaining on site at end of this period (processed)	36.5
Total waste remaining on site at end of this period	301.5
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	43,214
Waste sent offsite for energy recovery this period	27,331
Qualifying fines	0
Non-qualifying fines	1,281
Materials sent offsite as non-waste this period e.g. end of waste	0
Waste sent off for disposal (incineration without energy recovery)	0
Waste sent off for disposal to landfill	0
Total materials sent off site this period	71,826

NOTE: Qualifying fines shown separately per The Landfill Tax (Qualifying Fines) Order 2015. No waste was sent to landfill or to incineration without energy recovery. 'Period' refers to the annual reporting period (1 April 2025 – 31 March 2026).

*** Upon review of the data, the business recognises we can categorise this and report things more clearly. As such we will take this away as an action, with a view to report data in a more, clear and concise manner for the next report,

13. 11.2 Annual Recovery and Disposal Tonnages (Table 2)

The following table presents annual incoming and outgoing tonnages by waste stream and EWC/LOW code, in accordance with Table 2 of PAS 402:2025. Where incoming tonnages derive from a mixed load, the reported figure represents the best estimate of that specific stream only, not the total mixed skip tonnage.

Incoming LOW/EWC code(s) and description	Incoming tonnage	Outgoing LOW/EWC recovery/disposal code and description	Outgoing Tonnage	Waste stream	Destination treatment description
20 03 01 General waste / 15 01 06 Dry mixed recycling	56,426	20 03 01 General waste 19 12 12 (R12)	22,021	General waste	Transfer stations / MRF (A1 Recycling, Waste Wave, Calder Valley, OPES, Axiom)
20 03 01 General waste / 15 01 06 Dry mixed recycling	(above)	19 12 12 Mechanically treated waste (R12)	8,184	Processed residual	Transfer to further processing (Inerto, Direct Special Metals)
20 03 01 General waste	(above)	20 03 01 General waste (R12)	6,429	General waste — EfW	Energy from Waste (Hooton Bio Power, R12)
20 03 01 General waste	(above)	20 03 01 General waste (R01)	2,308	General waste — EfW	Energy from Waste direct (Hooton Bio Power, R01)

19 12 12 Mechanically treated waste	(site process)	19 12 12 Mechanically treated waste (R12)	11,382	SRF / RDF fuel	Energy recovery — SRF/RDF production (Envirofuel, Eco- Power)
20 01 08 Biodegradable/food waste / 20 02 01 Packaged food waste	5,946	20 01 08 Biodegradable waste (R03/R12/D08)	5,756	Food / biodegradable waste	Anaerobic digestion (Biffa AD Plant, Bioganix)
15 01 06 Mixed recycling (DMR/glass)	11,980	15 01 06 Glass bottles (R05)	5,343	Glass	Glass reprocessor (Sibelco)
20 01 01 Cardboard / 15 01 06 Mixed recycling	1,563	19 12 01 Paper/card (R03)	5,012	Cardboard / paper	Paper & card reprocessors (Winfibre, IWPP, SD Waste Paper, Pasha)
20 01 38 Wood / 15 01 03 Wood packaging / 17 02 01 Wood C&D / 19 12 07 Wood MRF	1,410	19 12 07 Wood waste (R12/R03)	1,456	Wood waste	Biomass energy (Stobart Biomass Transport)
17 09 04 C&D mixed / 17 01 01 Hardcore / 17 05 04 Soil & stone	4,117	17 01 01 Hardcore / aggregates (R05)	1,354	C&D materials / aggregates	Construction reuse & recycling (A1 Recycling, PP O'Connor)
17 08 02 Plasterboard	525	17 08 02 Plasterboard (R05/R12)	408	Plasterboard	Plasterboard recycling (Inerto)
20 01 39 Plastics / 15 01 02 Plastic trim / 19 12 04 Rubber	621	20 01 39 Plastics (R03/R05/R13)	517	Plastics / rubber	Plastics reprocessors (Pasha, KLN, Granu Tech, Steward, Elsa)

19 10 01 Light iron / 20 01 40 Scrap metal / 19 12 03 Aluminium	48	19 10 01 / 20 01 40 Metals (R04)	350	Metals	Metal merchants / recyclers (S Norton, Amberdeal, Bennett Bros)
20 03 07 Bulky items	22	20 03 07 Mattresses (R05)	8	Mattresses	Specialist recycling (Circom Fibres)
19 12 12 Mechanically treated waste	(site process)	19 12 12 Fines — non-qualifying (R12)	1,281	Non-qualifying fines	Transfer (A1 Recycling, J Dickinson)

TOTAL **70,699** **71,826**

NOTE: EWC/LOW codes per Technical Guidance WM3. Recovery/disposal codes: R1=energy recovery, R3=recycling organic materials, R4=metals recycling, R5=other recycling including glass/aggregates, D1=landfill. Asbestos excluded from all calculations (Clause 12.1 PAS 402:2025).

14. 11.3 Material Processed per Waste Hierarchy Category (Table 3)

The following table presents material processed as a percentage of total annual outgoing tonnage (71,826 tonnes) per waste hierarchy category, in accordance with Table 3 and Clause 12.2.4 of PAS 402:2025.

Waste hierarchy category	Annual %
Reuse	0%
Repair	0%
Recycle	62%
Energy recovery	38%
Landfill cover	0%
Disposal	0%

NOTE: Recycle (62%): cardboard, paper, glass, plastics, metals, C&D aggregates, plasterboard and screened fines sent for reprocessing — 44,495 tonnes. Energy recovery (38%): general waste to EfW, SRF/RDF production, anaerobic digestion and biomass — 27,331 tonnes. All other categories: 0%.

15. Method for Determining Landfill Diversion and Material Recovery Rates

16. 12.1 General

All tonnages have been measured using calibrated weighing devices at the Fresh Start Recycling Centre weighbridge in accordance with the Weights and Measures Act 1985. Where incoming tonnages derive from mixed loads, the reported figure represents the best estimate of that specific stream only. All masses are recorded in tonnes. All rates are expressed as percentages.

Asbestos is reported as a separate waste stream and excluded from all incoming and outgoing calculations in Clause 12, as there are currently no alternatives to landfill disposal for this material.

17. 12.2 Calculations

12.2.1 Landfill diversion rate (Equation 1):

$$(a - b) / a \times 100 = (70,699 - 0) / 70,699 \times 100 = 100\%$$

Where: a = waste received (70,699 t); b = waste to landfill (0 t)

12.2.2 Overall material recovery rate (Equation 2):

$$(a - b - c) / a \times 100 = (70,699 - 0 - 0) / 70,699 \times 100 = 100\%$$

Where: a = waste received (70,699 t); b = waste to landfill (0 t); c = incineration without recovery (0 t)

12.2.3 Percentage leaving site as fines (Equation 3):

$$c / d \times 100 = 1,281 / 71,826 \times 100 = 1.8\%$$

Where: c = qualifying fines (0 t); non-qualifying fines (1,281 t); d = outgoing waste (71,826 t)

Note: All fines are non-qualifying and sent for reprocessing. Qualifying fines = 0 t.

12.2.4 Material per waste hierarchy category (Equation 4):

$e / f \times 100$ — see Table 3 above. Total outgoing (f) = 71,826 t

Recycle: $44,495 / 71,826 = 62\%$ | Energy recovery: $27,331 / 71,826 = 38\%$ | All other: 0%