



PAS 402 Annual Report

Madigan Gill Waste Operations 2025

Report approved by Danny Madigan, Director

Signature:

January 2026 v1

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1. Introduction

Established in 2009, Madigan Gill is a hands-on, family-owned business with a passion for excellence in Construction Recruitment, Security & FM, Logistics, and Demolition. Our mission is for our people to help professional organisations reach their potential by supporting their endeavours with efficient, lasting, and value-driven support services, and for us to build an exceptional business that attracts, encourages and develops exceptional people.

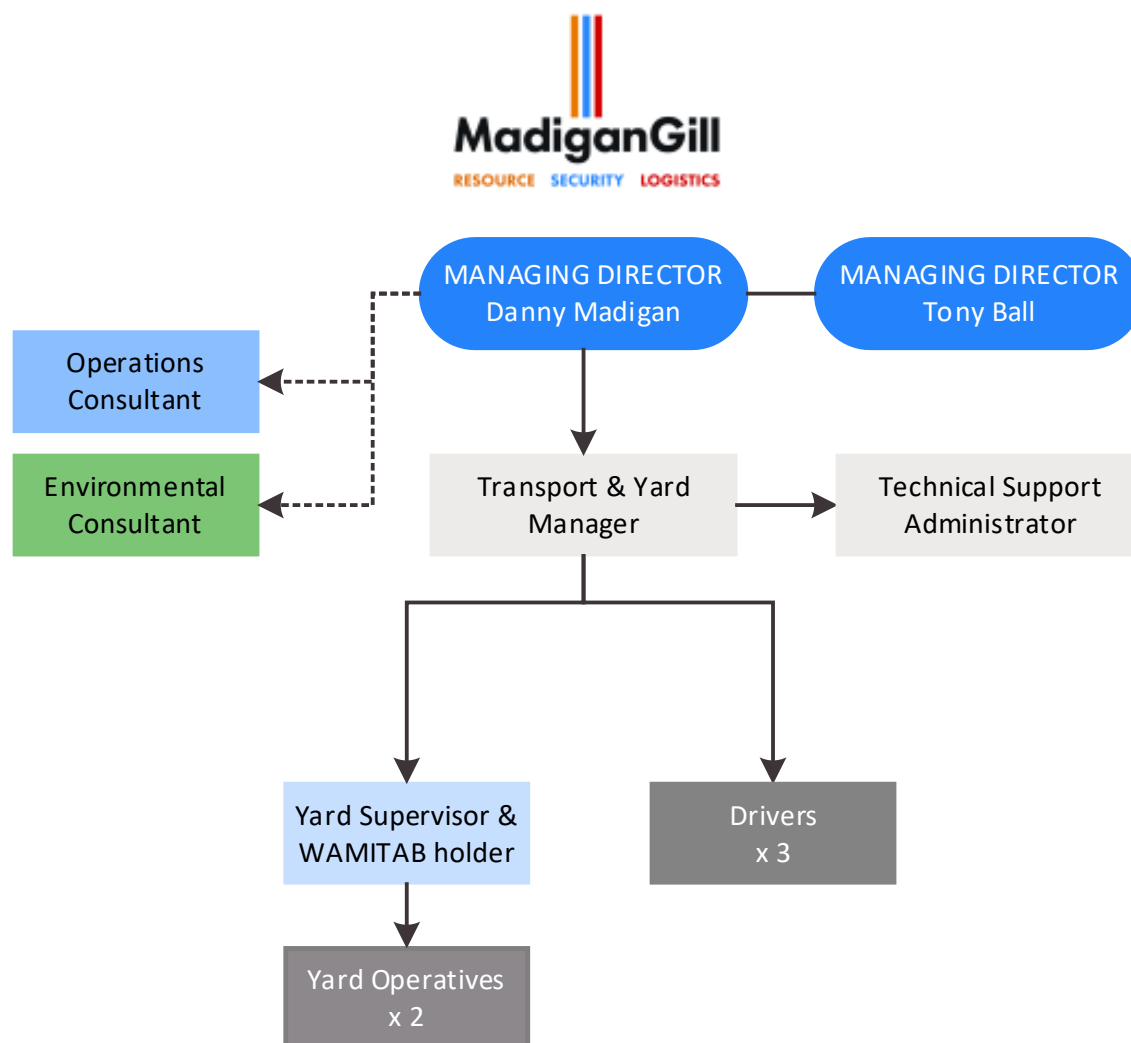
We underpin all that we do with integrity, pride in our work, sustainable actions and most importantly, respect between ourselves and our customers.

As a family-owned company, founded on family values and teamwork, we firmly believe that we have a responsibility to society and ourselves to set high social, ethical and sustainability standards. In our primary role as Logistics Contractor, we understand the nature of construction projects and offer solutions for projects either in the existing or new building proposal to provide first-class facilities to operatives and the management team.

Madigan Gill's Logistics arm is a single source solution for all construction logistic requirements that are tailored to suit project requirements. This aspect of the business is perfectly placed to manage our waste and recycling operations, alongside the full cycle of services we provide for our construction clients. This includes logistical planning for both on and off-site activity, liaison with local authorities and obtaining licenses/permits, site set up, security, traffic management, delivery management, fire strategy and management, waste management and temporary fit out.

1.1 Madigan Gill Recycling Site Organisational Chart

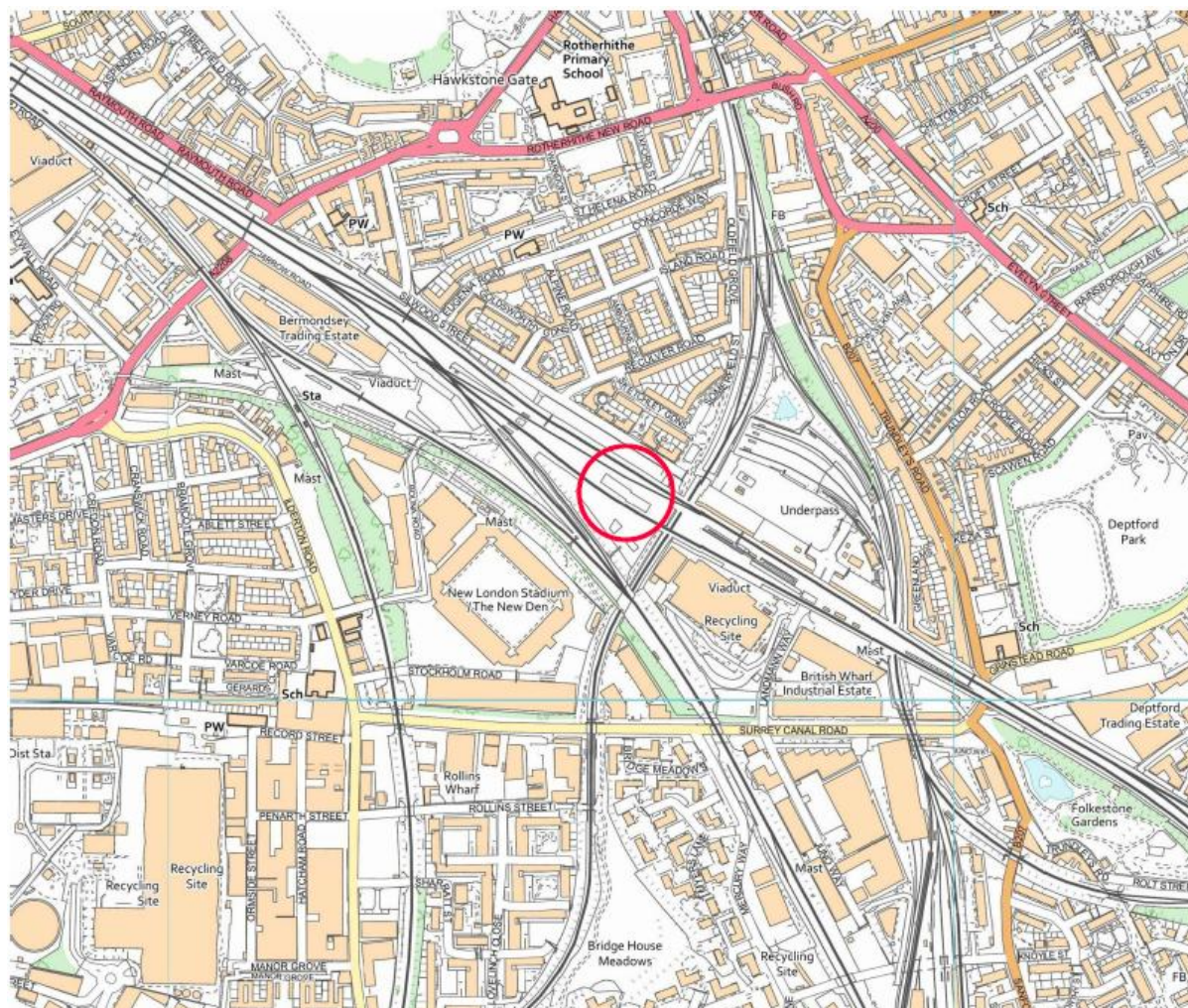
Madigan Gill's waste and recycling site management structure is shown below:



2. Scope of Operations

The scope of the waste recycling operations extends to the perimeters of the site at Arches, Silwood street, London, SE16 2SX and associated transportation of waste. The site is referred to as the 'Bermondsey' site. The activities covered by this annual report include the collection of waste and supply of waste control personnel, waste recycling activities carried out under Environment Agency permit exemptions at the Arches site and the associated plant and waste duty of care documentation.

The head office address of Madigan Gill Logistics Limited is 77 Leadenhall Street, London, EC3A 3DE.



3. Environmental Permits

Environmental Permits & Exemptions		
Permit Name & Reference	Activities	Tonnage Limits/
Environmental Permit EPR/FP3129LR/A001 Planning Permission Land leased from Network Rail through a lettings agency Yard 3 Railway Arches 433a to 451a Silwood Street London SE16 2SX	AR1 – Waste transfer and treatment R3: Recycling/reclamation of organic substances which are not used as solvents. R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic materials. D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12. D14: Repackaging prior to submission to any of the operations numbered D1 to 13. AR2 – Storage R13: Storage of wastes pending any of the operations numbered R1to R12 (excluding temporary storage, pending collection, on the site where it is produced) D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Treatment activities are limited to sorting, separation, screening, baling, shredding, crushing, compaction, and bulking. <u>Treatment does not include:</u> • soil or aggregate washing or heat treatments • asbestos • batteries • WEEE <u>Limits</u> • Annual limit 75,000 tonnes • 50 t/day treated for disposal • 50 t/day haz waste storage • 15,000 t/day storage of wastes in Table 2.3a • 40,000 t/day storage of wastes in Table 2.3b • 10 t total of waste batteries • 10 t total of waste tyres • 6 months waste storage
WEX 414528 Madigan Gill Logistics Ltd	Waste Exemptions Note that following the issue of the permit the registered exemptions will not be in use on the site. Permit restrictions and requirements supersede the exemptions.	Various tonnage limits and restrictions Expires 26/08/2027

Environmental Permits & Exemptions		
Permit Name & Reference	Activities	Tonnage Limits/
CBDU574220 Madigan Gill Logistics Ltd	Waste Carriers Licence Carrier, broker, dealer. Upper Tier	Expires 11/03/2028

4. Client Relationship

Waste Producers

Madigan Gill's clients consist of the internal teams who work on construction sites and whose waste we collect. Regardless of the fact that they are also Madigan Gill's staff, we take enormous pride in meeting their requirements, the same as we would if they were external contractors.

The Transport & Yard Manager looks after the accounts with all internal construction team leaders and takes every opportunity to educate and inform staff so that they know how to segregate waste effectively, especially on space-restricted sites, and understand their legal obligations regarding the waste hierarchy and 'simpler recycling' waste requirements.

Receivers of outgoing materials

The majority of our waste receivers hold a PAS 402 certificate and we work closely with them to ensure our product is the quality they require for their waste treatment processes.

We carry out due diligence checks on all our receivers prior to entering into any contract.

4.1 Innovative Software

Madigan Gill have worked with The Bridge Group to develop Fleet-X waste management software for the site's weighbridge that links to the transport management system for greater efficiency and accuracy.

Fleet-X software has proved very successful for transport planning and is in full use. This enables us to provide our construction project teams and senior managers with precise information regarding their waste streams and quantities. This promotes tracking of recycling and energy recovery and encourages improvement on the projects.

4.2 Complaints

We take complaints seriously and have a process on site to ensure that we carry out effective investigations, take corrective actions, and check that we are compliant and have made a positive difference to our business as a result.

In the event of any complaint or non-conformance the site manager takes all necessary steps to investigate and rectify the cause. If the problem cannot be rectified immediately it is escalated and more senior managers are involved if appropriate.

5. Impacts & Risks

Madigan Gill has undertaken an environmental risk identification of all areas of operations at the Arches Site which have the potential to cause harm to human life or significant environmental harm and recorded them in the Risk Register.

Significant risks are classified according to a written methodology which considers the following factors:

Where a significant risk is found it is put into an action plan so that improvements can be made. Managers meet to discuss opportunities for improvements on site that have been highlighted by the risk assessment process.

Risks are scored as described in the register and the final scores are calculated to identify the 'significant' risks as follows:

Risk Rating		Controls Multiplier	Residual Risk	Residual Rating
6-9	x	0.5	3	Low
10-14	x	0.75	9	Medium
15+ Significant	x	1	18	High

Priorities raised as 'significant risks' in red remain significant regardless of any controls. This makes sure that the highest priority risks remain properly understood by Madigan Gill and the controls do not make staff complacent. It is clear to staff that controls must be respected and fully maintained.

The final risk rating highlights what is harder to control. It is unacceptable for any risk to remain 'high' because this is rated after the controls have been applied. Managers are required to ensure controls lower residual risk to a minimum of 'medium'.

Significant risks include the potential for the site activities to cause pollution or contribute to climate change, and the impact that climate change factors could have on the site such as drought or intense storms. Currently the significant risks before controls are applied are identified as:

- Vehicle emissions
- Fire
- Use of water in case of fire
- Dust during dry weather and in high winds
- Lack of water for dust suppression
- Odour and litter from transportation of waste to and from site
- Failure of control and monitoring systems due to rising heat in hotter summers
- Complete failure of any processing plant or vehicles
- Amenity risks from waste processing of waste paper, polythene and card

Robust controls are applied to all these risks as detailed in the Risk Register.

This impact and risk identification is repeated for any operational changes or relevant changes to the area around the site and includes consideration of the outcome of any environmental monitoring, audits and complaint investigations.

6. Operational Management

6.1 Waste Management Controls

Madigan Gill is permitted to transfer and treat a range of non-hazardous and hazardous wastes under our standard rules permit. This includes permission to take in asbestos, WEEE and batteries however these waste streams are currently not received at our site.

Controlling our operations to ensure good health and safety practices, protect the environment and provide high-quality waste and recycling services is at the core of our business management.

We use a simple approach to the Waste Hierarchy: reduce waste as much as possible, reuse the valuable raw materials for repeated use, recycle a high percentage of waste for use in new products and recover by generating energy from incineration of residual waste.

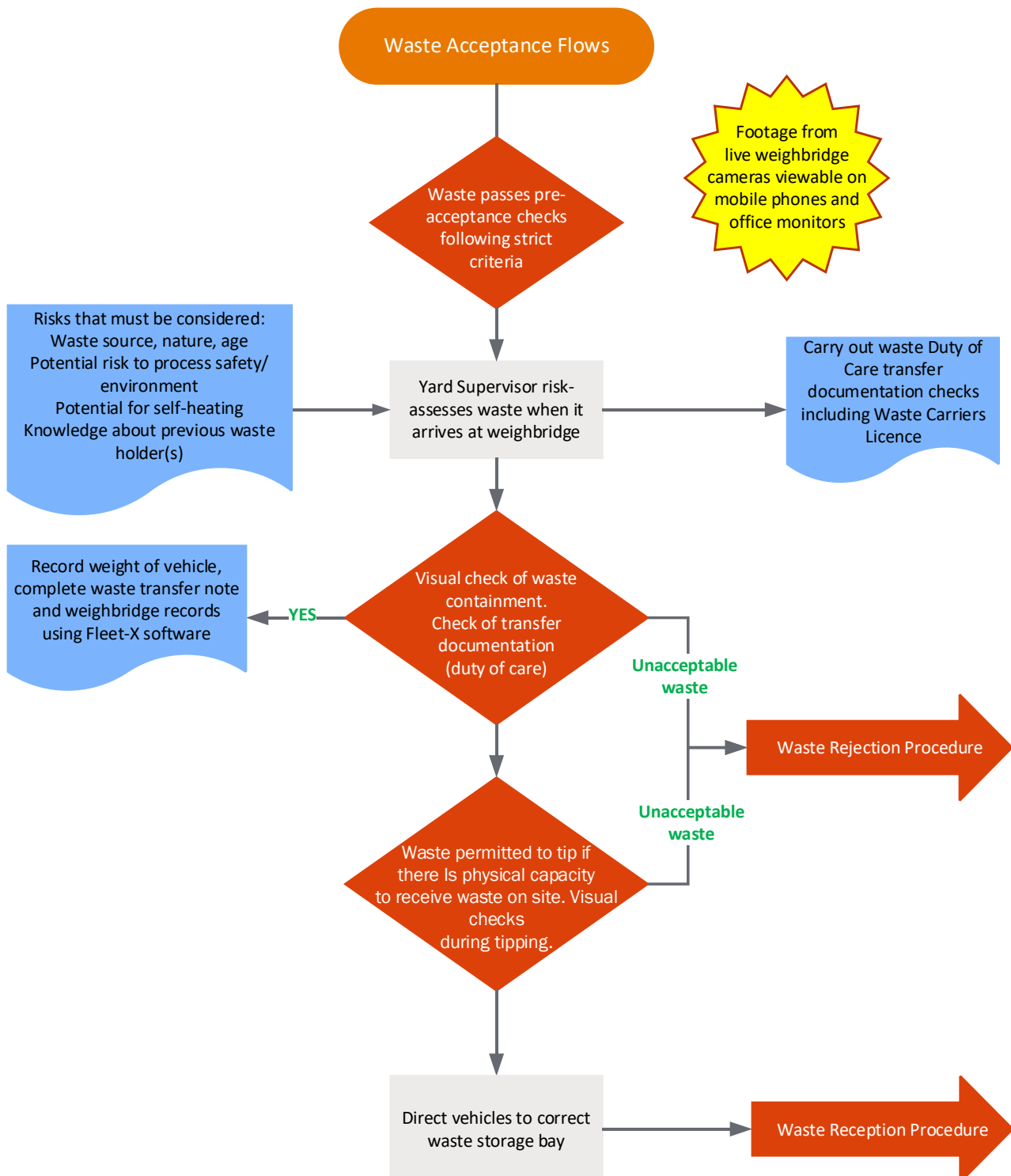
Waste pre-acceptance procedures are put in place to make sure we know enough about the incoming waste before it arrives at the site, and we can check it is technically and legally suitable for treatment. All our operational waste procedures follow a risk-based approach and we keep records to justify our decisions.

Waste acceptance procedures are in place to make sure the characteristics of the incoming waste match the pre-acceptance information. If the waste is not as expected, we may still accept it if the permit allows us to and we can treat it appropriately. Otherwise, it will not be accepted on site.

To reduce the risk of non-conforming wastes being delivered to the recycling facility, pre-acceptance checks of the materials and the customer are made prior to acceptance of their waste on site. The nature of the waste is assessed and any material which could affect the recycling potential of a whole load is kept separate or refused. The EWC code for the waste is matched against the environmental permit to check it can be taken into the site.

On arrival, wastes are weighed and checked to ensure that the material matches the duty of care documentation, then sent to the correct area on site for processing. The identity of the vehicle is recorded for traceability of each load. Non-conforming wastes are turned away and the customer informed of the decision and reasons for the non-conformance.

6.2 Waste Acceptance Flows



6.3 Site Walkover Checks

Understanding the impacts and risks on our site means that we can manage our operations to reduce health, safety, environmental and quality risks. We have various yard checksheets and other operational procedures in place and staff are trained accordingly.

To make certain that housekeeping is kept under control, and legal compliance is checked daily, site walkover checks are carried out using a detailed set of checklists. These include checks for fuel bunds, dusts, odour and other critical aspects. The results are recorded. Daily observations or events such as weather conditions and weighbridge calculations or complaints are recorded in the site diary.

7. Competence & Training

We are committed to ensuring that our workforce is fully trained and competent in looking after health, safety, quality and environmental issues during their working day. Training plans and records are maintained for all staff and recorded in the Training Matrix, which is regularly reviewed.

Madigan Gill have a staff training and induction procedure and regularly undertake toolbox talks for our staff and employees. We are committed to giving staff the time they need to be trained and carry out annual performance reviews of each member of staff and employee to ensure that the training needs are identified. We put plans in place to ensure that each employee receives the correct tailored training for their specific role.

All staff and visitors on site, including drivers, are expected to use reasonable skill and care when carrying out activities and are given a site induction to ensure they follow all site rules and instructions, which are provided and displayed.

The Environmental Permit is made available to all staff in hard copy on noticeboards and electronically.

The matrix below is an example of awareness sessions delivered throughout the company using toolbox talks.

Staff Role	Site Inductions	Environmental Permits TBT	Management Systems TBT	Climate Change Risks TBT	Dust & Air Quality TBT	Noise & Vibration TBT	Cleaning Plant & Machinery TBT	Waste storage & segregation TBT
Managing Director	✓	✓	✓	✓				
Transport & Yard Manager	✓	✓	✓	✓	✓	✓	✓	✓
Yard Supervisor	✓	✓	✓	✓	✓	✓	✓	✓
Yard Operatives	✓	✓	✓		✓	✓	✓	✓
Drivers	✓	✓	✓				✓	✓

7.1 Certificates of Technical Competence (CoTC) (WAMITAB)

WAMITAB stands for the Waste Management Industry Training & Advisory Board. WAMITAB qualifications are awarded by CIWM (WAMITAB), the authorising body, to those working in the waste and resource management sector. The purpose is to prove that site managers are technically competent in waste management, and to promote environmental sustainability.

WAMITAB Holder(s)	Cert No	CoTC Qualifications	Expiry Date
James Gwyther	5171749 Qualification Accreditation no. 601/8502/8	Operator Competence Certificate Physical & Chemical Treatment of Hazardous Waste WAMITAB Level 4 High Risk Operator Competence	Issued 23/11/2020 For use with cc only
James Gwyther	5273145	Continuing Competence (CC) Transfer – Hazardous waste	07/02/2027
		Continuing Competence (CC) Treatment – Hazardous waste	
		Continuing Competence End-of-life Vehicles (ELV)	
James Gwyther	5281721	Continuing Competence (CC) Transfer – Non-hazardous waste	28/05/2027
		Continuing Competence (CC) Treatment – Non-hazardous waste	
		Continuing Competence (CC) Metal Recycling Sites (MRS)	

7.2 Organisational memberships

Qualification/Membership	Expiry Date
FORS Bronze 102033	19/03/2026
FORS Silver 102033	03/04/2026

7.3 Plant & Vehicle Preventative Maintenance

The Transport & Yard Manager and Yard Supervisor work together on the planned preventative maintenance program to reduce the risk of plant or vehicle failure. The plant and equipment manufacturer's requirements are programmed into the maintenance plan and calendar where appropriate.

When action is taken to maintain or carry out work as a result of a malfunction or breakdown, a record is made of the corrective actions carried out using Fleet-Ex, the Bridge Group software.

Records of maintenance are kept electronically and/or in hardcopy as appropriate.

The de-greasing is carried out by an external service and maintenance contractor.

8. Corrective, Preventive & Improvement Actions

We believe in understanding our environmental, quality and health and safety performance so that we can continuously improve. We record all our incidents, audit outcomes, complaints and any other environmental event requiring action in our 'Action Tracker', which is maintained by the site manager.

Data in the Action Tracker can then be tracked and analysed for reporting to senior managers, who can make informed decisions regarding financial investments and the input of other resources such as staffing and time management.

Our aim is to develop the business with the environment, health, safety and quality as an integral part of all our activities. Our Accident Prevention and Management Plan and Fire Prevention Plan (FPP) are in place to ensure all steps are taken to stop an accident, environmental pollution or fire from happening. If anything does occur, we know what action to take to minimise any impacts. We care about the other businesses around us and have checked that there are no specially protected habitats nearby in London that could be particularly sensitive to our activities (refer to FPP for details). We carry out site inspections on a daily basis to ensure there are no leaks or spillages, and our yard is fully surfaced with no discharge to sewer or any other off-site drainage system.

The Accident Prevention & Management Plan identifies potential accidents, for example equipment breakdowns, enforced shutdowns, fires, vandalism, flooding, and other incidents which may cause an unexpected change to normal operations, such as bad weather.

Our incident management flow chart below summarises our process for identifying an environmental incident and what action we expect our staff to take. We record all our incidents, audit outcomes, complaints and any other environmental event requiring action in our 'Action Tracker', which is maintained by the site manager.

8.1 Contingency Plans

Madigan Gill's business contingency plan is designed to support permit compliance and help customers understand what actions will be taken to ensure service to them is as robust as possible in abnormal and emergency situations. It differs from the accident management and emergency preparedness

Fire Prevention Plan (FPP)

An FPP has been produced compliant with the Environment Agency requirements for fire prevention at the site including limits for height of waste storage, waste segregation, site drainage etc.

Emergency Preparedness Plan

Emergency situations can cause harm to the environment, such as pollutants in the air and water from fires and firefighting. In order to further minimize the risk from emergency situations such as fires, floods or any other event on site that could cause significant harm, we have put in place clear emergency procedures to make sure we can respond effectively as follows:

- Take action to prevent or reduce consequences of emergency situations
- Provide relevant training/information to interested parties
- Periodically test the planned response actions, e.g. spill response

Our Emergency Preparedness Plan is a manual for staff to use when an emergency has occurred. It is printed in hardcopy and placed at strategic areas around the site. Content includes:

- Emergency contacts
- Fire (refer to separate fire plan)
- Flooding
- Environmental incidents
- Incident notification
- Vandalism
- Leaks and spills, loss of containment etc.
- Failure of mains services – electricity and water
- Failure of equipment/operator error
- IT

The site noticeboard contains essential information for any person needing to contact site for emergency purposes. These boards have been placed on all major gateways into the site.

MADIGAN GILL LOGISTICS LIMITED

BERMONDSEY YARD



MadiganGill
RESOURCE SECURITY LOGISTICS



Environment Agency

Emergency contact
Yard Manager 07442 394990

Site authorised by the Environment Agency under an Environmental Permit
EPR/FP3129LR

Environment Agency telephone number
03708 506 506

Environment Agency Incident hotline
0800 80 70 60

8.2 Climate change considerations

A climate change risk assessment has been carried out and the risks prioritised according to the same risk scoring methodology described in section 5 above. The outcome is recorded in the risk register.

A climate change adaptation plan has been produced describing the general issues regarding climate change, setting out a summary of the risks and describing the associated controls. This must be read and used in conjunction with the risk register.

The following risks scored the highest in the risk register for the impact of climate change on the site and mitigation against these risks is therefore prioritised:

- odour risks during milder winter months
- lack of water for dust suppression
- failure of control and monitoring systems due to heat (especially the weighbridge, an essential requirement)
- drought
- failing IT systems

CO2 emissions have been identified as one of the higher impacts that the business could have on climate change; these are kept to a minimum by reducing company travel to essential journeys only, working with customers to make sure a job can go ahead smoothly, using vehicles with Euro 6 engines only, routing vehicles in the most efficient way and monitoring and reviewing fuel usage on a regular basis. Madigan Gill works with the authorities to agree local traffic routes where restrictions are necessary.

The UK is predicted to have hotter, dryer summers and more sudden and intense rainstorms as a result of climate change. This will result in a higher risk of odours in winter months when weather is milder than before. Madigan Gill has made containment of waste in the yard a priority with a dedicated Zap shelter to protect incoming waste from weather and reduce odour and dust emissions. There are regular checks on incoming and outgoing vehicles for waste containment to ensure to ensure correct sheeting of vehicles and no risk of waste escaping during transit. Vehicles such as the compactor are completely enclosed.

Water and energy consumption is minimised by encouraging staff to have good habits on site regarding water and energy usage, and promoting improvement ideas.

8.3 Legal and other requirements

During the planning process for the EMS we identified those pieces of environmental legislation that are relevant to our site, and the obligations we have to our clients, local authorities and other interested parties.

Our obligations to comply with environmental legislation and the Environmental Permit is key to the design of our activities, products and services. We have developed an Environmental Compliance Register which details all our obligations and records the actions we take to ensure that we comply with them.

Site procedures and safe systems of work set out the expectations we have of our staff who are trained on relevant processes and understand their legal responsibilities. Details are written up into operational procedures such as waste acceptance and control, amenity management and reporting, site engineering and drainage, dust suppression etc. to ensure consistency of compliance.

We are fully permitted by the Environment Agency and ensure staff are given the knowledge they need to be compliant with our Environmental Permits. For this reason our EMS is aligned with the Environment Agency's requirements at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Management of the environment on site is focused on environmental compliance. In order to ensure compliance with the Fire Prevention Plan (FPP), for example, the requirements stated in the plan are put into the relevant yard check sheets so that the FPP is an integral part of daily environmental management.

We use an external environmental consultant to provide information regarding the legislation that is relevant to our site and receive regular updates so that we know if there are any changes and can apply them accordingly.

Duty of Care Checks

Duty of care checks are carried out regularly by the Transport and Yard Manager and Yard Supervisor, who record the details in the waste matrix for all new and current waste carriers and permitted or exempt sites.

9. Performance Review

9.1 Performance Summary

Performance Summary	Total tonnes
Total material inputs this period	2,775
Waste used/retained on site this period e.g. for engineering purposes	0
Waste remaining on site at end of this period (unprocessed)	0
Waste remaining on site at end of this period (processed)	0
Total waste remaining on site at end of this period	0
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	1,576
Waste sent offsite for energy recovery this period	1,179
Qualifying fines	0
Non-qualifying fines	0
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 *note this doesn't include asbestos tonnages	0
Total materials sent off site this period (without asbestos)	0
Asbestos	2,756

9.2 Material processed per waste hierarchy category

Waste hierarchy category	Annual %
Reuse	0
Repair	0
Recycle	57%
Energy Recovery	43%
Landfill cover	0

Waste hierarchy category	Annual %
Disposal – note this does not include asbestos disposed to landfill	0

Please note that Landfill diversion and material recovery rates are not verified where any or all materials are sent to an organization that does not confirm to the requirements of PAS 402.

9.3 Performance Percentages

Summary %	%
Landfill diversion rate	100 %
Overall material recovery rate	100 %
Total waste leaving site as fines	0 %

9.4 Annual Recovery & Disposal Tonnages

Incoming waste stream	Incoming tonnage	Outgoing waste code	Outgoing tonnage	Outgoing waste stream	Destination treatment description
17 01 07 Hardcore	259	17 01 07 Hardcore	249	Hardcore	Recycling PAS 402 transfer and treatment station for further recycling.
Balance resulting from cross-quarter data	10				
20 03 01 Mixed Municipal	234	20 03 01 Mixed Municipal	236	Mixed Municipal	Energy Recovery PAS 402 transfer and treatment station then on to energy recovery.
Balance resulting from cross-quarter data	-2				
20 01 08 Kitchen & Canteen Waste	185	20 01 08 Kitchen & Canteen Waste	186	Kitchen & Canteen Waste	Recycling PAS 402 transfer and treatment station and onward into anaerobic digestion.
Balance resulting from cross-quarter data	-1				
17 08 02 Gypsum-based construction materials	1,044	17 08 02 Gypsum-based construction materials	1,045	Plasterboard	Recycling PAS 402 transfer and treatment station for further recycling.
Balance resulting from cross-quarter data	-1				
17 09 04 Mixed C&D	194	15 01 01 Paper & Card	192	Paper & Card	Recycling PAS 402 transfer and treatment station for further recycling.
Balance resulting from cross-quarter data	2				
17 09 04 Mixed C&D	351	17 02 01 Mixed Wood	347	Mixed Wood	Energy Recovery PAS 402 transfer and treatment station then on to energy recovery.
Balance resulting from cross-quarter data	3				
17 09 04 Mixed C&D	292	17 02 03 Mixed Plastic	288	Mixed Plastic	Recycling PAS 402 transfer and treatment station for production of Refuse Derived Fuel (RDF).
Balance resulting from cross-quarter data	4				

Incoming waste stream	Incoming tonnage	Outgoing waste code	Outgoing tonnage	Outgoing waste stream	Destination treatment description
17 09 04 Mixed C&D	124	17 06 04	122	Insulation Materials	Recycling PAS 402 transfer and treatment station for production of Refuse Derived Fuel (RDF).
Balance resulting from cross-quarter data	2	Insulation Materials			
17 09 04 Mixed C&D	94	17 04 07	90	Mixed Metals	Recycling PAS 402 transfer and treatment station for further recycling.
Balance resulting from cross-quarter data	4	Mixed Metals			