

PAS 402 ANNUAL REPORT 2025



The NWH Group
Albert Road, Leith. EH6 7DP
1st January 2025 – 31st December 2025



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INTRODUCTION

The NWH Group is one of the UK's leading recycling and waste management business with a mission to change its industry for the benefit of the planet. Serving the whole of Scotland and Northeast England from ten sites, the progressive, second-generation family business provides business waste management services and solutions to the industrial, commercial and construction industries.

Here at The NWH Group, we have material recovery facilities at two of our locations which specialise in the processing of construction & demolition, commercial, industrial and DMR materials. Our state-of-the-art MRF facilities enable The NWH Group to maximise the recovery of recyclable materials and minimise our waste to energy percentages.

On top of our MRF sites we also offer a wide variety of other services such as, Skip Hire, RORO, Trade-waste, Concrete Delivery, Tipper & Grab Hire, Road Sweeper Hire, Gritting & Snow Clearance, Recycled Aggregates & Sands, Inert Wash-plant Facilities & Wood Recycling.

Certifications & Accreditations

- Safe Contractor
- CHAS
- Achilles
- RHA

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- Constructionline Gold
- ISO 9001 & 14001



SCOPE OF OPERATIONS

We collect various waste streams with our very own fleet of trade refuse, skip, RORO, tipper, grab and walking floor articulated vehicles, we transport materials to our own recycling facilities where it is transformed into commodities such as cardboard, paper, plastics, scrap metals, washed sands, recycled aggregates & biomass for energy plants.

We stockpile various waste streams onsite within our site license restrictions, this can be pre-processed waste still to go through our processing plant or finished wastes ready to get transported to their final destinations.

Planning Permission Number	02/02076/FUL
Date of Permission	19.07.2002

Address	EA Licence
NWH Leith Albert Road, Leith. EH6 7DP	WML/L/1118800

Region	Waste Carrier Licence	Expiry
Scotland	WCR/R/1099479	04.01.2027

Waste Management Licence Capacities

Non-Hazardous	Annual Tonnage
Total	166500

Column1	Column 2	Column 3	Column 4
European Waste Catalogue code	Description including physical form	Daily Tonnage	Yearly Tonnage
15	Waste Packaging	80	2,000
16 01 03	End of Life Tyres	10	200
17	Construction and Demolition wastes	343	109,000
19 08 01 19 08 02	Wastes from wastewater treatment plants	60	5,000
19 12	Wastes from mechanical treatment of waste	150	20,000
20	Municipal wastes (household waste and similar commercial, industrial and industrial waste) including separately collected fractions	200	30,300
Maximum Total		843	166,500

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CLIENT RELATIONSHIP



The NWH Group processes are ISO9001 compliant, this enhances customer confidence & satisfaction through reliable quality processes & controls. It supports continual improvement through regular audits, reviews & performance monitoring.

Customer Feedback, including complaints, positive feedback and testimonials, customer satisfaction scores etc. are obtained and analysed by management. Customer satisfaction is evaluated and informs management planning and the management review.

Senior management proactively engage with the Supply Chain to build long term relationships and identify cross reference and partnership opportunities, update knowledge on products and new techniques. This engagement is monitored via supplier visits/ audits and meetings, internet search, email and telephone communication.

The credentials and performance of subcontractors is evaluated by the manager responsible with records maintained. Monitoring and measurement of suppliers takes place through inspection of goods delivery and review of product conformance. Data received via Feedback and Questionnaires will be discussed at periodic management meetings. The Register of Supplier Evaluation is maintained and updated according to the results of the evaluation, including their ability to meet required quality, ethical, occupational health, safety and environmental standards.

The NWH Group Ltd receive regular audits and inspections from commodity buyers to evaluate our waste incoming procedures, waste processing procedures and quality checks conducted on site to ensure a high standard of outgoing material.

Information Security Arrangements are monitored by an external IT supplier, including virus and hacking protections to prevent breaches in data protection and confidentiality. The CIO is the data protection officer registered under the ICO.

IMPACTS & RISKS

Our MRF site carries out daily, weekly and monthly inspections which cover different levels of intricacy which helps maintain high levels of safety and compliance.

On top of our onsite measures, we also employ a full time Compliance Manager who proactively carries out regular EH&S audits whilst visiting our various sites across Scotland & England and this site is visited weekly. This includes checking the processes and procedures follow the ISO 9001 Quality & ISO14001 Environmental standards. The Compliance Manager is experienced and qualified holding a Transport CPC, WAMITAB level 4 & H&S Level 6 diploma.

INSPECTION SCHEDULE

INSPECTION TYPE	PURPOSE	FREQUENCY
Compliance Inspection	To ensure compliance with legislation, regulations & standards	Annually
Management System Inspection	To evaluate the effectiveness of health, safety & environmental systems	6-monthly
Operational Workplace Inspection	To check day to day safety performance & identify unsafe acts or conditions	Monthly
Environmental Inspection	To assess environmental performance & sustainability process	Quarterly
Risk based audit	To identify and evaluate high risk areas for potential incidents	Quarterly
Behavioural Safety Audit	To observe worker safety behaviour and promote safety culture	Monthly

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Compliance Register

A FRO 02 Compliance Register is maintained and updated as required. Output from the business context evaluation, risk assessments and audits will inform the identification of compliance obligations on an ongoing basis. The Compliance Register is cross checked against the FRO 03 Environmental Management Planner and other risk assessments. At least once per annum the Compliance Register will be reviewed and updated.

Status of Compliance

The FRO 02 Compliance Register will be used as a basis for scheduled reviews, audits and inspections undertaken in accordance with the FAF 02 Audit Schedule. Refer to SP 011 Audits procedure.

The Compliance Manager is responsible for ensuring records of these compliance reviews, audits and inspections are maintained.

The FRO 02 Compliance Register and FAF 01 Action Register will be maintained to be used to highlight status of compliance.

Records of applicable compliance obligations and the status of compliance, including associated corrective and improvement action, will be maintained in accordance with SP002 Records procedure and the FDR 02 Register of Records.

Pollution Prevention

No burning of waste or other materials will take place on the site. An occurrence of a fire will be regarded as an emergency and immediate action will be taken to extinguish it or notify the emergency services as appropriate.

Refer to TOP 003 Environmental Emissions which describe the controls in relation to:

Dust; Mud; Odour; Noise, Litter; Water Pollution, Spillage, Smoking, VOC Emissions, Aerosols

Refer to TOP 002 Storage and Handling which describes the controls in relation to both material and liquids (not defined as waste).

Refer to TOP 001 Resource Efficiency for an overview of NWH's commitment to improve resource efficiency and our environmental performance.

Refer to TOP 005 Biodiversity Management for an overview of pest and exotic species control management.

Refer to SP 008 Emergency Preparedness & Response for an overview of spillage response, fire & evacuation and first aid procedures.

Refer to SP 010 Non-conformance, corrective & improvement action for an overview of the investigation and reporting of issues, non-conformances and improvements, ensuring senior management agree and implement corrective and preventive actions to drive improvement.

The business continuity plan is reviewed annually to ensure the site can operate within legislation.

Sustainability

Our Carbon Accounting Manager is responsible for measuring and monitoring our energy use and risk register which includes assessing business continuity depending on should the

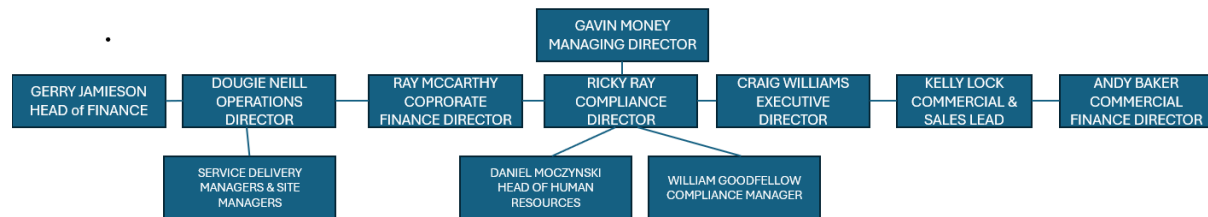
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climate get warmer, cooler or stay as it is. A comprehensive climate change risk assessment (CCRA) is under review to ensure compliance with future climate conditions, and our Fire Prevention Plan is reviewed quarterly.

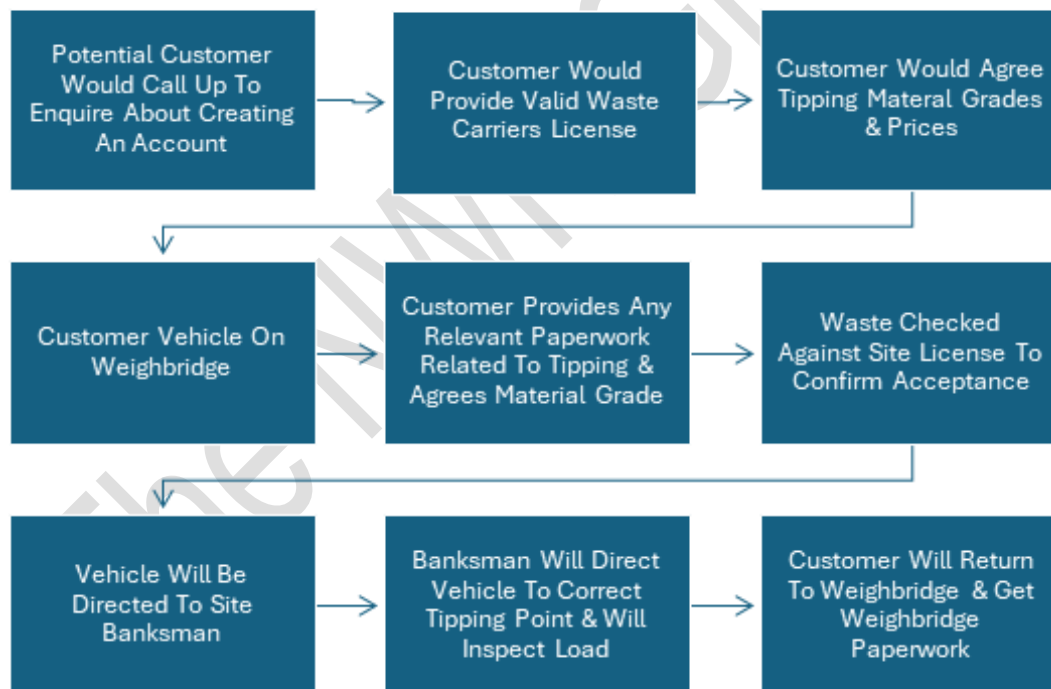
OPERATIONAL MANAGEMENT

NWH ORGANISATIONAL CHART

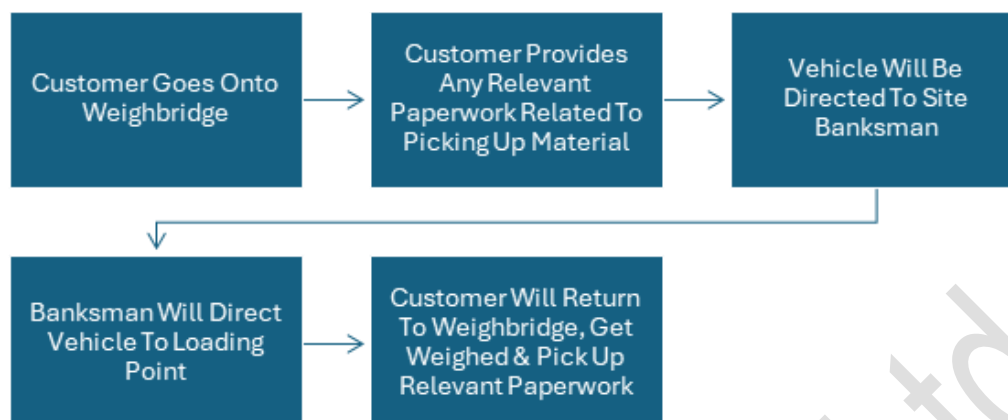


Site Processes

Incoming



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All staff are fully inducted and the site risk assessment & safe system of work for MRF is explained.

Waste stored within the storage bays shall not exceed a height of each bay wall at any time and prevented from falling out of the bay. Litter and any other debris will be swept up at the end of the working day, with further cleaning of the boundaries carried out weekly.

Periodically storage bays are cleared of all waste and thoroughly cleaned. If skips and containers have been damaged this should be reported to management immediately for repair or replacement. All plant and equipment onsite should be maintained in good working order according to planned maintenance scheduled coordinated by the Site Manager and Site Supervisor. Records of maintenance will be kept at the site office.

Separate storage areas are provided for specified materials such as:

- refrigeration equipment,
- pressurised gas cylinders,
- waste paint and paint related wastes,
- green waste,
- waste electronic and electrical equipment (WEEE)

All working surfaces are hardstanding. Site drainage includes sumps and open drains which encourage surface water to drain to the site interceptor for treatment prior to discharge to sewer.

Organisational Waste

All waste that is generated on-site from office and canteen is stored in wheelie bins, collected and weighed by our bins trucks and reported within our weighbridge system as NWH Leith waste.

Monitoring of incoming waste

Vehicles delivering waste to the site are not permitted to proceed unless the waste has been weighed and assessed at the entrance and the weighbridge overseer / competent person is satisfied that the: -

- a) waste conforms with the description in the documentation submitted by the holder.
- b) the type and quantity of waste comply with the site WML conditions.

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c) there is sufficient capacity for their safe and secure storage.

If accepted the waste is categorised according to its European Waste Code (EWC) and details logged into the weighbridge computer, including waste carriers licence details, origin of waste, type and weight of waste, customer etc. Weighbridge information is captured and summarised to produce quarterly reports to SEPA. Refer to QOP 002 Stakeholder Reporting.

The weighbridge is regularly serviced, maintained and calibrated in accordance with the manufacturer's recommendations. These records are kept at the site office. Any malfunction of the weigh bridge extending beyond 24 hours will be reported to SEPA and repairs effected as soon as possible and in any case within 3 working days.

Once the waste has been accepted over the weighbridge, it is then directed to designated areas of the site to off load the material or liquid waste. Refer to POP 010 Material Processing procedure.

The site is currently operating at 60% licence capacity; this is monitored through monthly incoming and outgoing waste reporting taking stock levels into account.

COMPETENCE

Qualification	Persons on Site	Persons Hybrid
Wamitab Level 4	1	5
Management CPC	0	4
IOSH Managing Safely	2	3
OHS Level 6	0	2

All employees benefit from in-house training and ongoing development opportunities. Plant operators are required to have the appropriate qualifications and skillset for their specific roles. All employees adhere to site rules. Our weighbridge operator and site banksman manage traffic control & load compliance.

All our staff have completed the necessary toolbox talks and risk assessments. Everyone is proactive in maintaining a clean and hazard-free yard, ensuring a safe environment for both our team and any visitors.

All training is recorded on a competency matrix which includes future planned training.

Competency Matrix

ADD IN DATE SAFE OPERATING PROCEDURE SIGNED														
1 = Do not Use, 2=Only use if supervised 3 = Monitor, 4 = Experienced, 5 Very Competent														
NAME	QUALIFICATIONS (ADR, NPORS)	MRF Risk Assessment	MRF General S.O.P.	360 Grab S.O.P.	Loading Shovel S.O.P.	PICKER	TROMMEL	WEIGHBRIDGE	KEY HOLDER	SHREDDER	BANKSMAN	TELEHANDLER	IOSH	TAKE 5
William Goodfellow	ADR exp 02.26 Loading Shovel exp 12.25	01.12.2025	05.12.2025	30.10.2025	30.11.2025	05.05.2025		05.05.2025	05.05.2025		05.05.2025	05.05.2025		4/15/2025
Barry Brown	IOSH Loading shovel, 36	13.01.2026	26.02.26								17.07.2026		28.02.25	29/05/2025
James Conaghan		22.01.2026	27.02.26											29/05/25
James Walker	IOSH	22.01.2026	02.02.26											29/05/25
Karl Edward Charles-Jones	Grab exp 13.06.2027 Loading Shovel exp 03.02.26	28.01.26	27.02.26											29/05/25
William Hogg		22.01.2026	27.02.26											29/05/25
James Kowalski		22.01.2026	27.02.26											29/05/25
William Judd		29.06.26	27.02.26											
James Tucker		22.01.2026	27.02.26								17.07.2026			
Adam Morton		22.01.2026	02.02.26											
Steven Anderson		29.06.26	29.06.26											

CORRECTIVE, PREVENTATIVE & IMPROVEMENT ACTIONS

This procedure describes the system for monitoring, measurement and performance evaluation relating to the management system of NWH Group Ltd ensuring conformance with ISO 14001, ISO 9001 and ISO 45001 standards.

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This procedure describes mechanisms for monitoring the effectiveness of the management system and continual improvement in line with strategic direction.

Responsibility

Managing Director Senior Management/ Compliance Manager/ Management Representative	To provide adequate resources for monitoring, measurement and performance evaluation.
	To ensure appropriate monitoring information is captured, analysed and used by management to evaluate the effectiveness of the management system and drive continual improvement.
	To maintain records providing evidence of monitoring, analysis, evaluation and reporting.
Staff, Operatives and Subcontractors	To comply with management system procedures and provide feedback concerning the effectiveness of the Management System.

Resource for monitor & measuring

Senior Management are responsible for ensuring adequate resources are provided for monitoring and measurement. This includes determining:

- what needs to be monitored and measured.
- the methods for monitoring, measurement, analysis and evaluation needed to ensure valid results.
- when the monitoring and measuring shall be performed.
- when the results from monitoring and measurement shall be analyzed and evaluated.

Monitoring data will be assessed to enable senior management to evaluate the performance and effectiveness of the management system to achieve strategic direction and policy commitments

This includes:

- Ensuring calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.
- Ensuring investment in IT systems and other tools to capture and analyze performance data to inform management planning and the management review.
- Ensuring robust data to inform environmental performance communications both internally and externally as required by the NWH Group Ltd. This includes VWS PurGo/ waste recycling figures; EA waste reports etc.
- Ensuring customer perceptions are monitored, including the degree to which their needs and expectations have been fulfilled.
- Monitoring Sickness Absences, establishing trends and conducting trend analysis to inform health surveillance and risk management, and to enable calculation of optimum number of employees required in the future.
- Occupational Health Surveillance to protect the health of employees by early detection of adverse changes or disease; collect data for detecting or evaluating health hazards and evaluating control measures.

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- Capturing feedback from interested parties, including employee consultation and participation in the continual improvement of the management system.
- Monitoring performance in operations/ activities aligned with the critical factors of success and policy objectives; this includes workforce competency; financials etc.

Planned maintenance, inspection & testing

The NWH Group Ltd have a planned maintenance system to ensure the regular inspection, testing, servicing and calibration of plant, equipment and vehicles.

Equipment will be checked as fit for 'purpose' prior to use, including the use of daily pre-start checks.

Defects are noted on specified forms / VWS Purgo asset register, and corrective / improvement actions identified and initiated. Significant issues are raised during management meetings.

Electrical equipment is tested periodically (PAT Testing). Equipment that has passed inspection is given stickers with status and test date.

A 3 yearly fixed electricity test will be conducted for any building under The NWH Group Ltd responsibility.

All devices used for monitoring and measuring will be:

- Calibrated or verified at specified intervals determined by the type of device where it may be guided by manufacturer instructions or legal and other requirements (standards) or prior to use.
- Identified to enable the calibration status to be determined.
- Safeguarded from adjustments that would invalidate the measurements through controlled use and operation.
- Protected from damage and deterioration during handling, maintenance and storage again through controlled use.

Assets of The NWH Group Ltd will be traced using a unique identifier which is captured on the asset register and item e.g. via the use of an asset code which can be scanned by a smart device.

In the situation of where plant/ equipment/ vehicles/ measuring devices do not conform to requirements an alert/ action will be captured e.g., by VWS Purgo and the relevant manager will be informed and will undertake the necessary corrective action.

It is the responsibility of the Compliance Manager to undertake periodic reviews of external audits/ insurance inspection reports to ensure required actions are carried out in a timely manner. These reviews are planned according to the Audit Schedule.

Refer to Register of Records for the location of maintenance, inspection, testing and calibration related records.

Continual improvement towards The NWH Group Ltd business strategy, policies and objectives, will be monitored through the Register of Objectives and Improvement Plans. The effectiveness of actions to address risks and opportunities will be assessed, including evaluation of the business context.

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The status of compliance with legal and other requirements will be monitored via the Compliance Register, Scheduled Reviews, Audits and Inspections.

Occupational health surveillance will be undertaken where required. Where results indicate that action is required, personnel will advise their line manager/Compliance Manager/Management Representative.

Performance standards for controlling hazards and risks shall be monitored and reviewed by ensuring:

- a. These procedures are in place which identify hazards arising directly or indirectly from the work activities of The NWH Group Ltd.
- b. Appropriate control measures are considered.
- c. control measures are put into practice and used successfully.
- A. capturing quantitative and qualitative monitoring data, including feedback; and
- e. overseeing the behavior and work standards of employees to ensure compliance with prescribed systems of work. Refer to Risks & Opportunities, Audits, and Operational Controls.

Significant environmental aspects, hazards and occupational health & safety risks are identified, assessed and monitored through employee engagement and scheduled reviews, which is also triggered in the event of planned/ unplanned changes affecting the company. Environmental monitoring data is captured including waste recycling figures, fuel efficiency and carbon emissions, where applicable. This data is captured to ensure that resources are being used in the most efficient and cost-effective manner, and customer and quality parameters are being achieved.

Health & Safety monitoring data is captured including accidents, incidents, near misses, feedback from staff, absences, sickness, occupational health visits, site inspections.

Organisational Knowledge requirements, including the evaluation of training needs and workforce competency, will be monitored by management. For example, via informal appraisals, supervision and competency assessments, feedback and management meeting discussions.

The effectiveness of Internal & External Communications, including Feedback, Participation and Consultation, will be monitored and discussed at management meetings and the Management Review.

The effectiveness of The NWH Group Ltd activities, products and services is monitored via internal checks, feedback from sales representatives, repeat orders from customers, customer audits and inspections, and the analysis of documented customer feedback (e.g., emails). Where required, further monitoring will be carried out on equipment and subcontractors to ensure conformity with contract requirements.

The effectiveness of Emergency Preparedness & Response arrangements will be assessed by management, including data from drills, accidents/ incident reporting and investigations. Data to inform the effectiveness of The NWH Group Ltd management system will be obtained via Internal and External Audits and Inspections, including feedback and investigation into root cause of non-conformances, corrective actions and opportunities for improvement.

Continuous improvement

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As part of the Management Review, a summary report will be generated by the Compliance Manager to capture inputs and outputs, including a summary of performance data discussed and an evaluation of the effectiveness of the management system.

KPIs relevant to the business strategic direction, critical factors of success, policies and objectives will be compiled and reported at relevant meetings, including the Management Review.

Management Meetings, including the Management Review, are held to review the results of monitoring and measurement, to evaluate performance and the review of the effectiveness of the management system to deliver policies and objectives.

Corrective and Improvement Actions arising out of the evaluation of performance, will be captured within the Register of Actions, Register of Objectives, Improvement Plans, and Meeting Minutes.

Target / Objective	By whom / By when	NWH
Hydrogen lorries to be investigated	Ricky Ray by December 2026	Test lorry to be tried with the aim of starting to move fleet to hydrogen. (only two charging stations in Aberdeen and Dundee is the challenge) Carried forward from last year
Sustainability program and route map to zero to be introduced and championed	Craig Williams by January 2030	Measurement, planning and strategies to be developed and deployed. 50% reduction in carbon footprint by 2030 is the first measurable
Company cars to become 100% electric	Ricky Ray by Dec 2026	Mercedes Benz and Western Mercedes are in the process of implementing a strategy of vehicle replacement.

PERFORMANCE REVIEW

Performance Summary	Total Tonnes
Total material inputs this period	99123
Waste used/retained on site this period e.g. for engineering purposes	0
Waste remaining on site at end of this period (unprocessed)	620
Waste remaining on site at end of this period (processed)	1020
Total waste remaining on site at end of this period	1640
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	42144
Waste sent offsite for energy recovery this period	13977
Qualifying fines	42097
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

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Waste sent off for disposal to landfill

10234

Total materials sent off site this period

108454

Incoming LOW/ EWC code(s)A) and description (multiple)	Incoming tonnage	Outgoing LOW/ EWC recovery/disposal code and description (1 only per row)	Outgoing tonnage	Waste stream	Destination treatment description
15 01 06 - Mixed DMR	2210				
Mixed Skips	0	15 01 06 - Mixed DMR	2067	15 01 06 - Mixed DMR	Reprocessing
17 02 01 - Wood Grade 1 & 2	4259				
Mixed Skips	7466	17 02 01 - Wood Grade 1 & 2	11725	17 02 01 - Wood Grade 1 & 2	Reprocessing
17 02 03 - Plastic	54				
Mixed Skips	423	17 02 03 - Plastic	477	17 02 03 - Plastic	Reprocessing
17 04 02 - Aluminium	9				
Mixed Skips	121	17 04 02 - Aluminium	130	17 04 02 - Aluminium	Reprocessing
17 04 07 - Mixed Metals	280				
Mixed Skips	2610	17 04 07 - Mixed Metals	2890	17 04 07 - Mixed Metals	Reprocessing
17 05 04 - Soil & Stone	3797				
Mixed Skips	0	17 05 04 - Soil & Stone	960	17 05 04 - Soil & Stone	Recycling
17 08 02 - Gypsum	3568				
Mixed Skips	0	17 08 02 - Gypsum	3445	17 08 02 - Gypsum	Recycling
19 08 01 - Sewage Screenings	1566				
Mixed Skips	0	19 08 01 - Sewage Screenings	1574	19 08 01 - Sewage Screenings	Landfill
19 12 03 - Non-Ferrous Metals	0				
Mixed Skips	78	19 12 03 - Non Ferrous Metals	78	19 12 03 - Non Ferrous Metals	Reprocessing
19 12 09 - Soil & Stone Mech Treated	0				
Mixed Skips	10740	19 12 09 - Soil & Stone Mech Treated	10740	19 12 09 - Soil & Stone Mech Treated	Recycling
19 12 12 - Mech Treated	4500				
Mixed Skips	3309	19 12 12 - Mech Treated	7809	19 12 12 - Mech Treated	Landfill
19 12 12 - Mech Treated	4600				
Mixed Skips	3721	19 12 12 - Mech Treated	8321	19 12 12 - Mech Treated	Reprocessing
19 12 12 - Mech Treated	0				
Mixed Skips	450	19 12 12 - Mech Treated	450	19 12 12 - Mech Treated	Energy
20 01 02 - Glass	939				
Mixed Skips	160	20 01 02 - Glass	1099	20 01 02 - Glass	Reprocessing

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20 03 01 - Mixed Municipal	22734	20 03 01 - Mixed Municipal	13479	20 03 01 - Mixed Municipal	Energy
Mixed Skips	0				
20 03 01 - Mixed Municipal	386	20 03 01 - Mixed Municipal	849	20 03 01 - Mixed Municipal	Landfill
Mixed Skips	0				
15 01 02 - Paper & Cardboard	172	15 01 02 - Paper & Cardboard	10	15 01 02 - Paper & Cardboard	Reprocessing
Mixed Skips	0				
16 01 03 - Tyres	0	16 01 03 - Tyres	2	16 01 03 - Tyres	Reprocessing
Mixed Skips	2				
20 01 23 - Fridges	7	20 01 23 - Fridges	7	20 01 23 - Fridges	Reprocessing
Mixed Skips	0				
19 12 10 - RDF Containing POPS	227	19 12 10 - RDF Containing POPS	51	19 12 10 - RDF Containing POPS	Energy
Mixed Skips	0				
20 01 39 - Plastics	0	20 01 39 - Plastics	40	20 01 39 - Plastics	Reprocessing
Mixed Skips	40				
19 12 12 - Qualifying Fines	0	19 12 12 - Qualifying Fines	42098	19 12 12 - Qualifying Fines	Landfill Cover
Mixed Skips	42098				
20 02 01 Biodegradable	173	20 02 01 Biodegradable	149	20 02 01 Biodegradable	Composting
Mixed Skips	0				

Waste hierarchy category	Annual %
Reuse	0.00%
Repair	0.00%
Recycle	38.86%
Energy recovery	12.89%
Landfill cover	38.81%
Disposal	9.44%

Landfill Diversion

90%

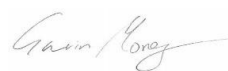
Overall Material Recovery Rate

90%

Percentage of Waste Leaving as Fines

39%

These landfill diversion & material recovery rates are taken directly from The NWH Group statistics and waste data returns. They are not independently verified where any or all materials are sent to an organization that does not confirm to the requirements of PAS 402.



Gavin Money
Managing Director
11th August 2026

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