

Annual PAS 402 Report

1 Jul 2024 – 30 Jun 2025



Report approved by James Redmond, Director

Date: 11th November 2025

Signature:

Who we are

RTS Waste Management and Crossways Recycling are part of the Mobius Recycling Group. RTS are passionate about commitment to our customers, our employees and our environment. All our actions are governed by our responsibility to protect people and the environment for future generations, which we take extremely seriously. We are always looking to challenge and push the boundaries of traditional methods, bringing innovative ideas to our varied operations.

We are a leading provider of integrated waste management services in London and Kent, offering Commercial, Construction and Industrial sustainable waste collection, recycling and disposal services. We have a waste transfer station and a purpose-built material recovery facility that enables us to offer a zero-landfill option. RTS is the sustainable solution for our clients' waste and recycling needs; as a licensed waste carrier we handle waste as a resource with reliability, responsiveness and professionalism, paying close attention to the Environment Agency, Chartered Institution of Wastes Management (CIWM), the Waste Hierarchy and Circular Economy.

As a large team of waste professionals, we manage the optimum waste and recycling solution for our clients' needs, which will result in their recycling targets being met and an improvement to their bottom-line costs. As a local, reliable and responsive waste management team we have the potential to react quicker than national waste operators. The service we offer is personal and bespoke to each client; we supply the right containers and solutions for clients to sort their waste on site, ready for collection – from refuse sacks and wheeled bins, man and van, up to skips, RORO's and mobile compaction for bulkier items.

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. No matter what waste is brought in we sort it, clean it, and process the residual matter.

Waste is not just about moving something that is no longer needed; there are backroom things we do to continuously improve. Achieving the PAS 402 standard is an important part of that improvement.



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Scope

Mobius Recycling Group Ltd

Parent company for RTS Waste Management Ltd and Crossways Recycling Ltd.

RTS Waste Management Ltd

RTS Waste Management Ltd is the logistics arm of Mobius Recycling Group, located at Unit D1 Manor Way Business Pk, Swanscombe, Kent, DA10 0PP. This is our Head Office and Operational Centre which includes maintenance. There is a London-focused fleet of 22 vehicles branded RTS, working out of this location.

Crossways Recycling Ltd

Our Kent facility, located at Plot 15 Manor Way Business Pk, Swanscombe, Kent, DA10 0PP, consists of a waste transfer station and material recycling facility (MRF). It has a weighbridge and 2 articulated lorries.

We work primarily for commercial clients and the construction and demolition (C&D) sector, offering a diverse range of waste management services including but not limited to:

- Residential Skip Hire
- 'Man In Van' Waste Collection
- Commercial/Trade Waste Management
- Skip Hire
- Roll On Roll Off Hire
- Wheeled Bin Collections (for general/municipal waste)
- DMR Dry Mixed Recycling
- Dedicated Collections (including glass, food, cardboard, and paper)
- Compactors
- Balers
- Bag Collections

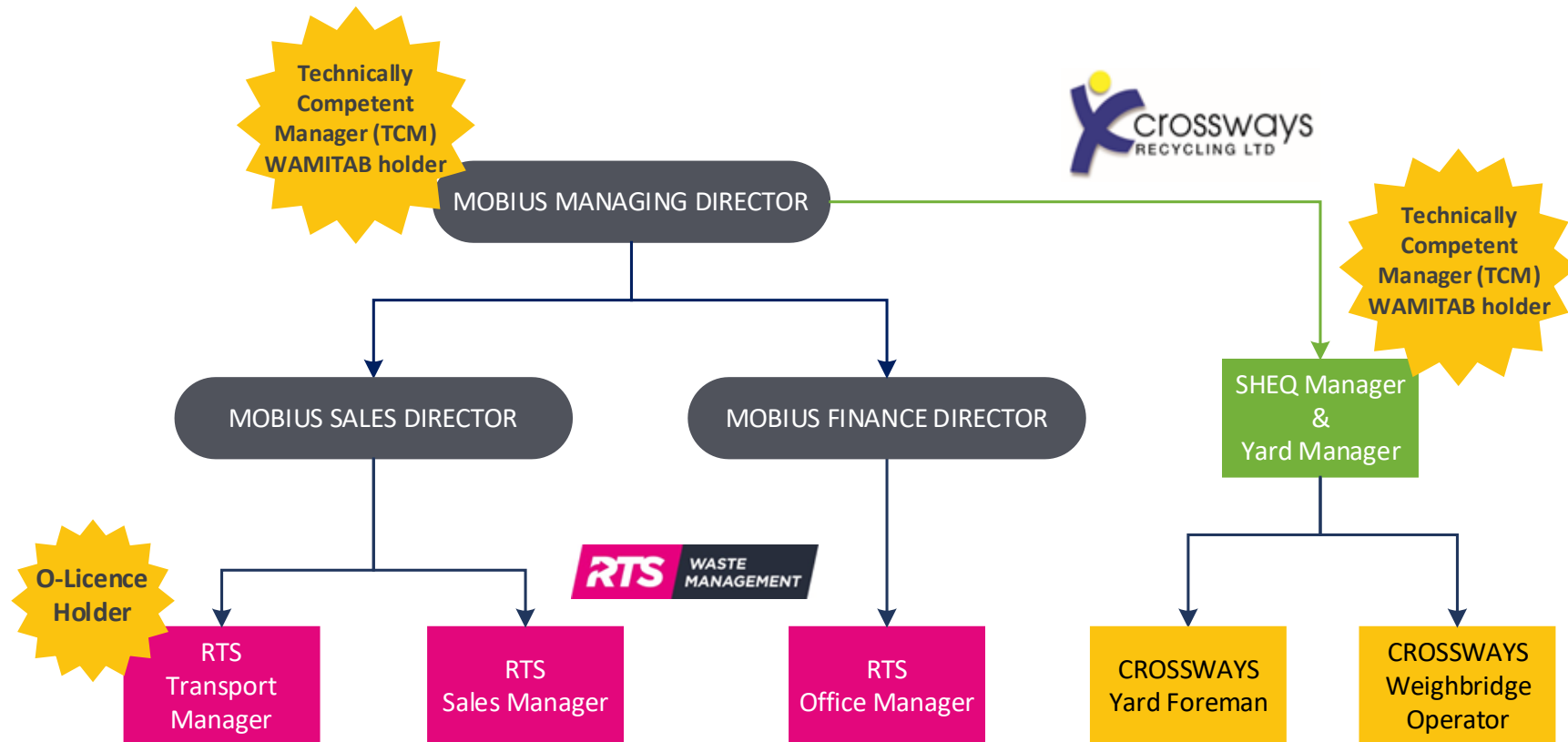
We provide a diverse range of integrated services for businesses operating in the facility management industry, including general waste disposal, mixed recycling and construction waste including plasterboard. Providing a Total Waste Management (TWM) solution to some customers means we subcontract out services for food waste, clinical waste, confidential waste and hazardous waste. As a specialist in plasterboard recycling, we have partnered with London's leading construction companies, providing mobile compaction services, resulting in an efficient method of responsible waste management.

Since 2012 we have been working hard to forge new innovations in resource management, assisting our clients to achieve environmental compliance. We provide a range of bespoke waste solutions to reduce landfill, increase recycling, and dispose of materials in a responsible manner. We carry out annual and site-specific client audits which focus on segregation of waste and the application of the waste hierarchy to any new waste streams coming into business operations, resulting in increased recycling rates.

Company Management System and Company Structures

Company Management System documents for each location are available in electronic and hardcopy format for use by all staff.

The Mobius Group high-level structures are shown below and over-page, covering both the RTS and Crossways operations:



Environmental Permits & Exemptions		
Permit Name & Reference	Activities	Tonnage/Expiry
Waste Transfer Permit A11 EPR Ref: KP3698HF/V003 EAWML/19378 Crossways Recycling Ltd Plot 15 Manor Way Business Pk Swanscombe Kent DA10 0PP Planning Permission DA/09/853	Household, Commercial & Industrial Waste Transfer Station Permit D9: Physico-chemical treatment D15: Storage	<39,060 tonnes/year Treatment of waste: ≤33,480 tonnes/year Inert waste 19,530 tonnes/year Metal waste 1,395 tonnes/year HCl waste 20 t/day, 5,580 t/year
WEX 384676 RTS Waste Management Ltd	Waste Exemption: T4 Preparatory treatments (baling, sorting, shredding etc) Storage of waste <12 months, various waste types.	Various tonnage limits and restrictions Expires 15/10/2026
CBDU317550 Crossways Recycling Ltd	Waste Carriers Licence Carrier, broker, dealer. Upper Tier	Expires 19/12/2025
CBDU386357 Mobius Recycling Group Ltd Plot 15 Manor Way Business Pk Swanscombe Kent, DA10 0PP	Waste Carriers Licence Carrier, broker, dealer. Upper Tier	Expires 26/04/2027

Client Relationship

We work with our customers to segregate waste and have a minimum impact on the environment. Our friendly approach to providing the best possible service to our customers is key, from the operational support team in booking orders, the dispatch of vehicles by our transport team, the drivers and operatives on site, to the treatment and data reporting. The full range of services available can be found here: <https://www.rtswaste.co.uk/>

Enquires are logged and evaluated to ensure the following:

- Available capacity to ensure adequate cover to service the clients' needs
- Ability to meet specific response time required by the client
- Ability to meet legislative/regulatory and statutory requirements
- Availability of resources materials/labour/skills
- Suitability of outsourced product/service provision

Once we've understood our client's requirements, we provide a contractual agreement containing details of:

- Type of waste and quantity
- Storage/containment
- Frequency
- Client site Health & safety issues
- Cost/pricing structure
- Payment terms and conditions
- Acceptance criteria
- Request for codes of practice/instruction at client site

Waste Terms and Conditions of Service are available here: <https://www.rtswaste.co.uk/about-us/licences-and-accreditations/>

Customer Satisfaction

We discuss the quality of service with our customers when completing their work. If a customer doesn't wish to renew the service we spend time with them to find out how or why we didn't meet their needs and use the information to improve. Discussing these results at management review meetings really helps us to keep focussed on the needs of our clients, and analysing the data helps us identify our strengths and weaknesses.

Areas highlighted from the analysis may be used to set improvement objectives and entered onto our Management Programme.

We will get back promptly to any customer complaint or concern and carry out a 'root cause' investigation to get to the bottom of it. We like to keep the customer informed of progress and the decisions made to rectify the problem and prevent it from happening again, because that not only helps the customer but gives us the opportunity to deliver a much better service to everyone. We respond to all complaints in the same way, whether they concern a private householder, a C&D company or the HSE/Environment Agency.

Quality of Waste for Receivers

We invest time in researching the waste organisations we deliver our waste and recycling materials to. The quality of our outgoing streams is key to ensuring we can use the best waste receivers. We have to understand the processes our waste and recycling are going into and then make certain our materials meet those specifications.

For example, non-hazardous wood for use as biomass fuel must not contain harmful varnishes, paints or glues. Bulky waste must not contain persistent organic pollutants (POPs) or they cannot be recovered by the waste receiver. Loose refuse-derived-fuel (RDF) must not contain large amounts of hard plastics because this increases the calorific value of the waste and affects the efficiency of Energy to Waste plants.

Impacts & Risks

We plan ahead to reduce health, safety, environmental and quality risks and to ensure ongoing quality of service. In particular we make certain our waste materials are what our waste receivers require, to reduce the risk of waste being rejected and disrupting our customer service.

We record our risk planning in a Risk Register to identify actions for high-priority risks and repetitive risks that could build up over time. The Risk Register considers the interests of a broad range of parties from the Office of Traffic Commission to the HSE and Environment Agency, suppliers, neighbours and staff. High level issues are recorded in our Business Continuity Plan, such as the diversion of waste if required. Our waste receivers are included in our risk assessment because if they cannot take our waste we must adapt quickly to ensure a consistent service. For this reason we also ensure we have a range of waste off-takers where possible.

We focus our attention on the political, economic, social, technological, legal and environmental factors that indicate both risks and opportunities. Once these are prioritised, we manage the risks and maximise the opportunities through controls, for example drawing up succession plans for critical roles in the business, tasking staff with monitoring UK and European changes to laws and regulations, in particular for Brexit, and carrying out long-term planning for IT infrastructure.

A high-priority example is the action we take to monitor the ever-changing London emissions charges, tax legislation and volume of traffic in order to ensure the most efficient service to customers and to deliver best practice regarding carbon footprint requirements. To reduce the business impact on air emissions and increase our environmental performance every vehicle in our fleet is now Ultra Low Emission Zone (ULEZ) compliant.

Action to address low-level but repetitive risks includes daily activities such as litter-picking, to make sure we don't affect others with litter either on or off site.

Climate Change

We talk about climate change within our organisation much more than we used to. The area of London we are in experiences drought more regularly. Waste activities cause dusts on hot, dry days and with reduced water availability we must find new ways of reducing dusts, for example.

We also consider the affect of our activities on climate change. When considering improvements in equipment, reducing our carbon footprint is a key factor. For example, purchasing new blades for our shredder to shred further down on wood, increasing the tonnages on transport vehicles and decreasing runs to the receiving site.

Business Continuity

Considering all the risks associated with waste activities and climate change a business continuity plan has been developed to set out how we will respond during times of greater stress within the business. Prevention is the most important action to take, but if we are faced with an emergency we want to be prepared. We have put in place back-up solutions for a variety of emergency events including fire or loss of electricity, so we can continue to deliver our service whilst we manage the emergency until it is over.

When several problems occur at once, the waste sector can come to a temporary halt, for example when multiple incinerators close for maintenance during the same time period, waste will need to go to alternative waste sites. We work hard at maintaining our relationships with waste service provider so that we always have somewhere else to go.

Operational Management

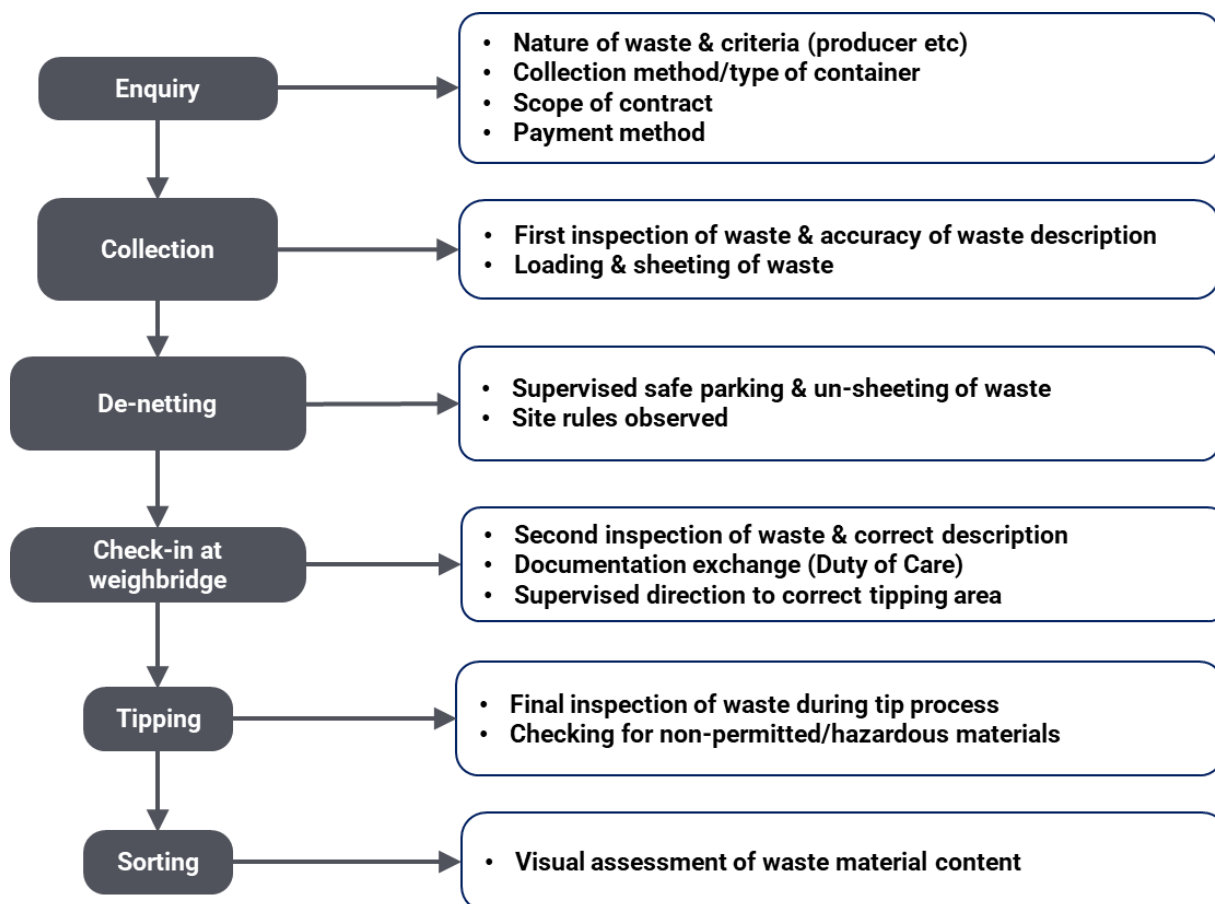
Our Integrated System Manual & associated Operating Procedures are generated & implemented to align with ISO 9001 (Quality Management), ISO 14001 (Environmental Management) and ISO 45001 (Health and Safety).

Our operating procedures are detailed in our Environmental Management System. Our Health and Safety Consultancy are contracted by Mobius Group to provide a comprehensive range of health and safety services, including safe systems of work (SSOW). Crossways has a Fire Risk Assessment, Workplace Risk Assessment and a Traffic Management Plan.

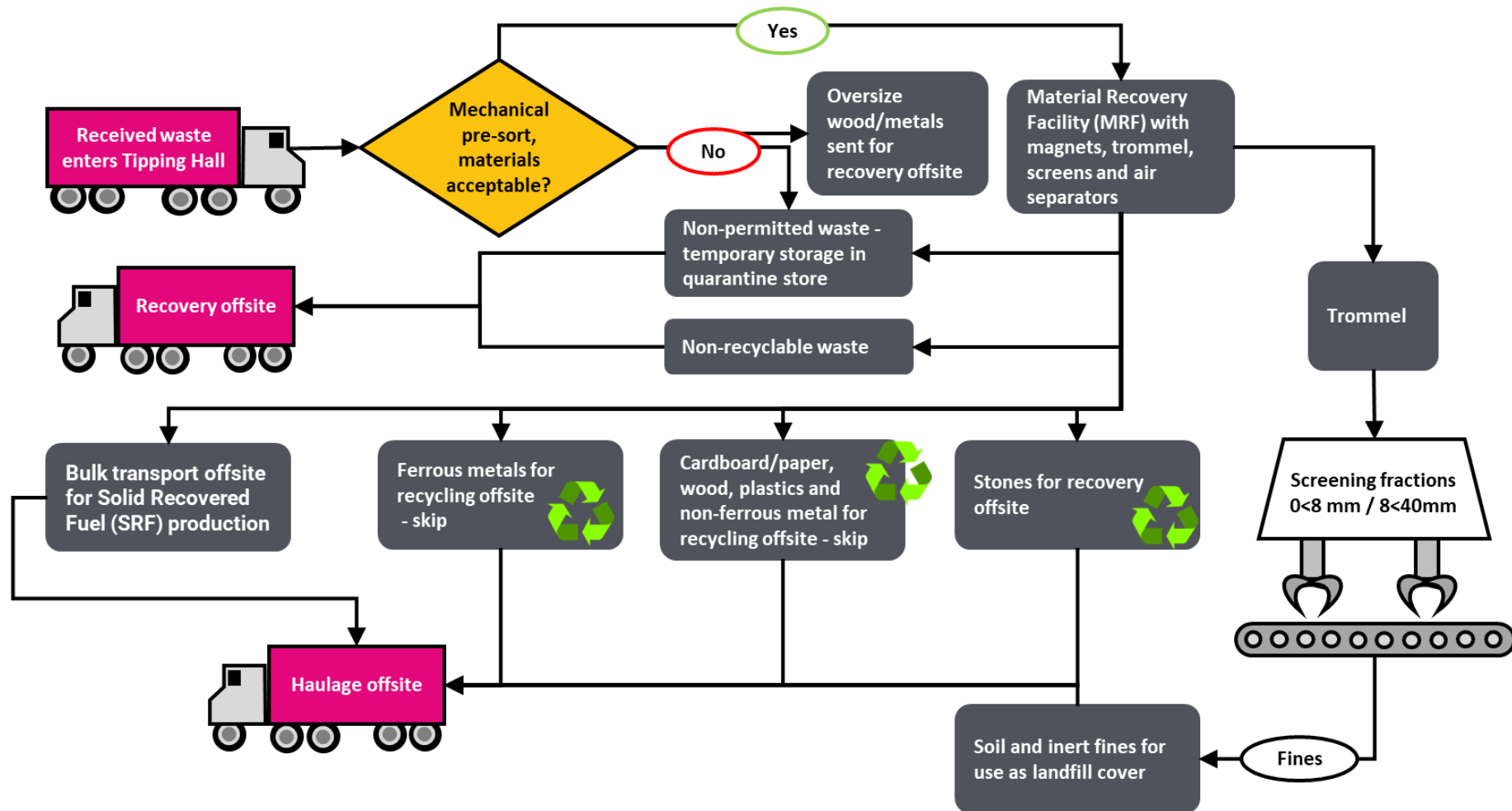
RTS has a full vehicle, plant and equipment maintenance system using software for reminders and external providers for regular servicing of vehicles. Our external providers supply documentation for all the services they carry out for us and we file it for our audit trails.

Our drivers are fully trained in vehicle checks and complete the required checksheets daily. All findings are logged on our system and action taken to correct any faults found. We track issues to ensure they are closed out in a timely manner, taking legal requirements into account. No vehicle is allowed on the roads unless it is legal compliant at that point in time.

The diagrams below summarise our waste acceptance procedures:



The process flow below shows how waste and recycling is processed on site.



Competence

It is important to us that employees are adequately trained in order to carry out their duties safely so we are committed to ensuring that our workforce is fully trained. Managed by our IMS, we ensure the resources needed are maintained and there is continual improvement. We periodically review the Training Matrix to check that it's focused and effective, and make sure our staff have the capabilities they need to carry out all the services we provide.

All Employees & Contractors receive induction training that includes company policies, specific hazards likely to be encountered and steps to be taken to minimise risk, general hazards likely to be found at the workplace and their control and any specific customer requirements. Induction programmes include line manager training and specific training and awareness programmes are undertaken by staff and authorised ICT users to enable them to be aware of their responsibilities for information security.

We evaluate training needs on an individual and organisational basis, either as a result of internal management meetings, employee appraisals or day-to-day supervision. Evaluation of needs also takes place on the introduction of new equipment, materials or where a new activity is to be performed.

Training plans and records are maintained for all staff; an example is shown below:

Examples of Training Undertaken	INDUCTION TRAINING	HEALTH & SAFETY	ON SITE RULES	EQUAL OPS	DRIVER CPC (5-yearly)	MANUAL HANDLING	DRIVER HOURS	FIRST AID AT WORK (3-yearly)	FIRE SAFETY
Machine Operator	June								
Yard Supervisor	June					Feb			
Driver	June				Mar				
Skip Driver					Mar				
Roro Driver					Mar				
Transport Manager	Feb						Jun		
Fitter									Dec
Trainee Fitter								Nov	

Organisational memberships:

Qualification/Membership/Registrations	Ref No	Start Date	Expiry Date
Freight Transport Association Member	141287	October 2005	N/A
Fleet Operator Recognition Scheme (FORS) Gold Award	013042	02/10/2025	01/10/2026
The Construction Commitments: Halving Waste to Landfill (WRAP & Strategic Forum for Construction)	N/A	18/01/2012	N/A
Safe Contractor for waste services incl traffic management and working with chemicals and hazardous substances	QI5214	06/02/2025	06/02/2026
Logistics UK	310071	2021	01/01/2026

The following members of staff hold Certificates of Technical Competence (CoTC):

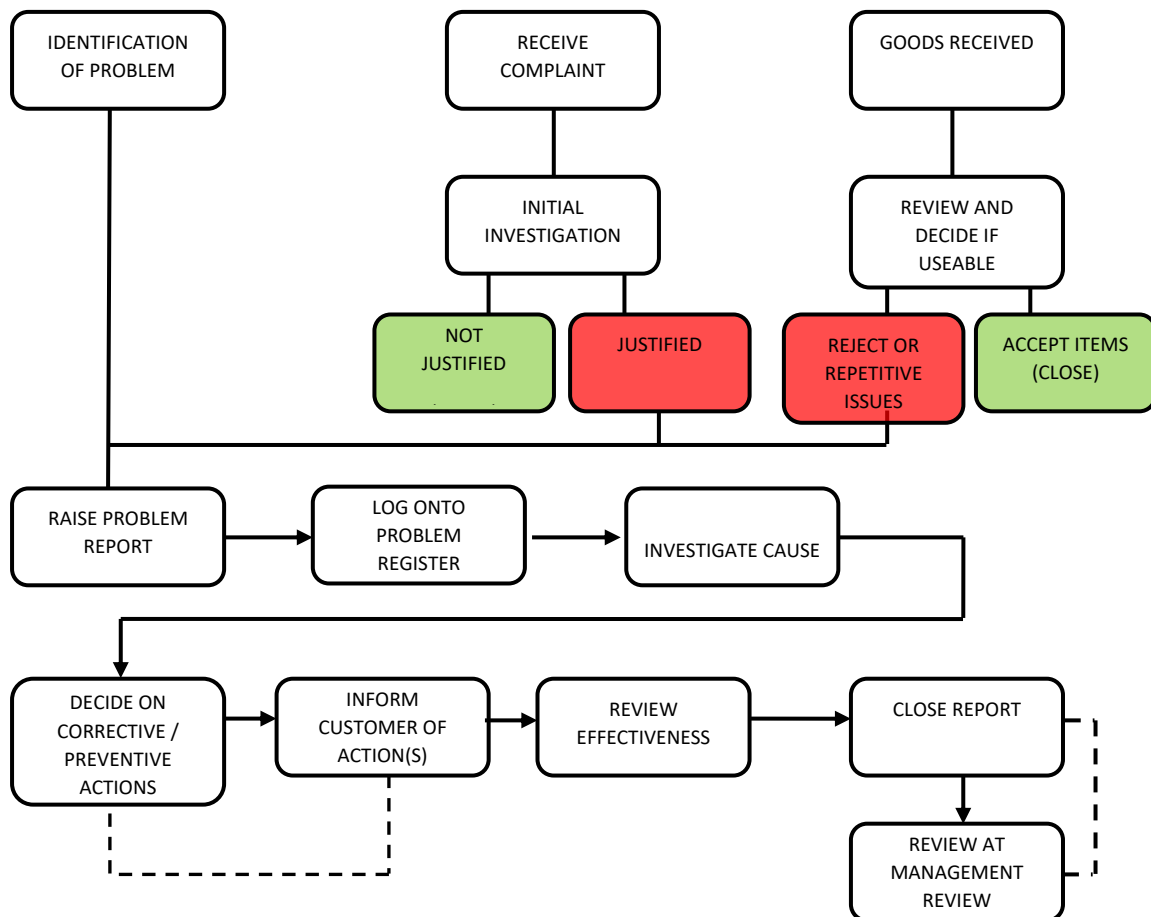
Environmental Permits	CoTC Qualification (WAMITAB)	Cert No	Issue Date
Meena Macdonald	Level 4 High Risk Operator Competence for Managing Physical & Chemical Treatment of Hazardous Waste	5239350	21/11/2023

Corrective, preventive and improvement actions

We record progress made on corrective and preventive actions, so that we have evidence of the improvements put in place. Accidents are recorded in the company and relevant customer site accident book, but our aim is not to let them happen in the first place.

Where quality issues occur, we investigate the cause and put things right straight away where we can, planning in longer-term action where needed. We have internal audits to double-check that the actions are effective. These are particularly useful for the directors, who are kept informed so that they can see procedures are being kept to and can step in if needed to support those staff working to make improvements. Only a director can close an action, once it's been resolved to their satisfaction. Following on from this, there are periodic reviews to fully analyse the data and track trends.

The flow chart below summarises our process for health, safety, quality and environmental non-conformances:



Management of compliance requirements

We recognise the mandate to understand legislation and other requirements relevant to our activities and are committed to compliance, including standards that are meaningful to our business such as PAS 402. Legal and other requirements are detailed in our Aspects Log. Consultants provide the detail of the legislation in our Compliance Register.

The individual site Health and Safety Policies describe arrangements for compliance. 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.

We are fully permitted by the Environment Agency at all our sites and ensure staff are given the knowledge they need to be compliant with our Environmental Permits. 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 the framework for maintaining compliance is in place.

We carry out annual reviews of our compliance requirements to ensure that we are up to date and effective in carrying out our duties and maintaining standards.

Audits are an essential part of gathering information about our environmental, health, safety and quality performance and reduce the risk of non-compliance. Outcomes are reviewed at management meetings to ensure continuing improvement.

Performance Review

Summary of 2024/25 Objectives and Targets Achieved

Improvement	Comments
New bailer on site	The new bailer on site is suitable for bailing both Correx protection boards and plastic which is improving the quality and transportation of both streams.
Wood waste	During 2025 the primary problems with wood waste came from a surplus of material due to reduced demand from processing facilities, regulatory changes, and persistent issues with contamination and sorting infrastructure. During this time RTS continued to provide a waste wood collection service and have since acquired contracts with wood suppliers for 2026. This will ensure a stable wood waste collection service for customers. New blades acquired on the shredder to shred further down on wood, increasing the tonnages on transport vehicles and decreasing runs to the receiving site.
New Sany Excavators for	Purchase of two new Sany Machines to bring greater efficiency to the picking operations.
Health & Safety improvements on vehicles	New AI cameras for London's Direct Vision Standard (DVS) requirement fitted on all vehicles to enhance safety by identifying and alerting drivers to vulnerable road users (VRUs) in the vehicle's blind spots. Bottom windows fitted on vehicles to further assist with blind spots.
New Ad-Blue Tank	A 5,000 litre Ad-Blue Tank has been purchased, maintained and inspected by the organisation.

A waste review has been conducted for a full year from 1 July 2024 to 30 June 2025. Our waste recycling figures are different this year, calculated in line with the new PAS 402:2025 and provided in the tables below. We have included details of our waste recovery and recycling providers for complete transparency.

Performance rates	Annual %
Landfill diversion rate	100 %
Overall material recovery rate	100 %
Trommel fines	6 %

STOCKPILES

The Yard Manager assesses the stockpiles on a daily basis and arranges regular collections in order to keep them as low as possible.

PAS 402 Calculations 2024-2025

Performance Summary	Total tonnes
Total material inputs this period	37,845
Waste used/retained on site this period e.g. for engineering purposes	0
Waste remaining on site at end of this period (unprocessed)	225
Waste remaining on site at end of this period (processed)	255
Total waste remaining on site at end of this period	510
Waste sent offsite for reuse/repair this period	0
Waste sent offsite for recycling this period	5,410
Waste sent offsite for energy recovery this period	29,724
Qualifying fines	2,201
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	0
Total materials sent off site this period	37,335

Material processed per waste hierarchy category

Waste hierarchy category	Annual %
Reuse	0
Repair	0
Recycle	14%
Energy Recovery	80%
Landfill cover	6%
Disposal	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.

Annual Recovery & Disposal Tonnages

Incoming waste stream	Incoming tonnage	Outgoing waste code	Outgoing tonnage	Outgoing waste stream	Destination treatment description
17 01 07 Mixtures of concrete, bricks, tiles & ceramics	324	17 01 07 Mixtures of concrete, bricks, tiles & ceramics	21	Hardcore	Recycling Recycled at Gallagher Aggregates, Hermitage Quarry, Kent, for further use as aggregates or void-fill at the quarry
17 05 04 Soil & Stones	86	Stockpile	389		
20 02 01 Biodegradable waste	113	20 02 01 Biodegradable waste Stockpile	89 24	Green Waste	Recycling Branches with leaves on transferred at Countrystyle's Ridham Docks facility for composting at other sites.
17 02 01 C&D Wood	3,665	19 12 07 Non-hazardous wood Stockpile	6,721	Wood	Incineration Recovered as fuel at MVV Environment Ridham's biomass burner, Ridham Dock, Kent
17 09 04 Mixed C&D	2,624		643		
20 03 01 Mixed Municipal	1,075				
17 02 01 C&D Wood	105	19 12 07 Non-hazardous wood	105	Wood for Pellet Manufacturing	Recycling Recycled at Tilbury for use in pellet manufacturing
15 01 06 Mixed Packaging	7	19 12 04 Plastic & Rubber	7	Plastics	Recycling Plastics sent for further processing into plastic pellets for sale into reprocessing activities.
17 02 03 Plastics	77	Stockpile	77		
17 08 02 Plasterboard	3,629	17 08 02 Gypsum-based construction materials	3,625	Plasterboard	Recycling Recycled at Countrystyle Recycling Ridham Facility near Sittingbourne, Kent, for use in plasterboard manufacturing by Knauf
17 09 04 Mixed C&D	236	Stockpile	240		
20 03 01 Mixed Municipal	15,408	20 03 01 Mixed Municipal	15,615	Mixed Municipal	Incineration Recovered as fuel at Cory Riverside Energy, Belvedere, Kent & Processed on site into RDF and removed to an Energy from Waste facility for use as fuel.
		Stockpile	207		

Incoming waste stream	Incoming tonnage	Outgoing waste code	Outgoing tonnage	Outgoing waste stream	Destination treatment description
17 04 07 Mixed Metals	3	19 12 02 Ferrous metal	782	Ferrous Metals	Recycling Recycled at Ace Car Breakers, Swanscombe, Kent
17 09 04 Mixed C&D	779				
15 01 01 Paper & Card	97	19 12 01 Paper & Card	700	Paper & Card	Recycling Recycled at Pulp Friction, Erith, Kent, for use in paper manufacturing.
17 09 04 Mixed C&D	602				
17 04 07 Mixed Metals	3	19 12 03 Non-Ferrous metal	59	Non-Ferrous Metals	Recycling Recycled at Ace Car Breakers, Swanscombe, Kent
17 09 04 Mixed C&D	57				
15 01 06 Mixed Packaging	186	19 12 10 Combustible Waste	4,745	Refuse Derived Fuel (RDF)	Incineration Material sent off-site as loose RDF for recovery in Europe.
17 09 04 Mixed C&D	2,127				
20 03 01 Mixed Municipal	886	Excess removed from previous stockpile	506		
19 12 10 Combustible Waste	1,040				
20 01 11 Textiles	0.1	19 12 12 Processed Waste (POPs-free)	2,627	Waste for Further Processing	Incineration Material re-processed for Energy from Waste in the UK and also to create RDF for baling and sending to Europe.
17 09 04 Mixed C&D	2,446	Excess removed from previous stockpile	181		
17 02 02 Glass	30	20 03 07 Bulky Waste	13	Bulky Waste & Glass	Recycling Material is sent to a material recycling facility for further sorting and processing.
17 06 04 Insulation Materials	13	Stockpile	30		
17 09 04 Mixed C&D	9	16 01 03 End-of-life Tyres	9	End-of-life Tyres	Recycling Tyres sent to Kent for reprocessing into pellets.
17 09 04 Mixed C&D (soil, concrete, bricks, ceramics only)	2,201	19 12 12 Processed Waste	2,201	Qualifying Fines	Recycling Recovered as landfill cover.

Incoming waste stream	Incoming tonnage	Outgoing waste code	Outgoing tonnage	Outgoing waste stream	Destination treatment description
20 03 01 Mixed Municipal	16	20 03 01 Mixed Municipal	16	Incineration	Incineration Material re-processed for Energy from Waste in the UK and also to create RDF for baling and sending to Europe.