

FRESH START WASTE MANAGEMENT

WASTE MANAGEMENT ANNUAL PERFORMANCE REPORT

01 APR 24 – 31 MAR 25

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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.

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 Scope of Operations

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

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.

Between the 1st April 2024 and the 31st March 2025, 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

Fresh Start Waste Services Limited and the Fresh Start Recycling Centre do not operate any exempt waste operations.

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

15/66033/FUL - 5 Hilton Square, Pendlebury, Swinton, M27 4DB
Change of use from B2 (General Industry) to recycling depot – 08/10/2015

17/70214/FUL - Hilton Square, Pendlebury, Swinton, M27 4DB
Proposed new canopy over recycled glass storage bay – 15/09/2017

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.

Waste Operations take place out of Units 4 and Hilton Square, Pendlebury, Swinton, M27 4DB. Unit 3 is outside of the scope of this report.

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

There are no exclusions from the scope of this report.

CLIENT RELATIONSHIPS

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 four Commercial Development Managers headed up by a Senior Commercial Development Manager, and two Regional Development Managers (providing dedicated support to the education and construction sectors). 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 2024-25, the industry was preparing for Simpler Recycling which became law on the 31st March 2025. 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:

- 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 multicompartment 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 Multicompartment 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.

IMPACTS AND RISKS

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).

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

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.

OVERSIGHT & ACCREDITATION

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

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.

At the last audit, the APHA recommended that we switch detergent to one approved by DEFRA ([Defra-approved disinfectants](#)). After analysing the list of approved detergents, we worked with a local manufacturer (Evans Vanodine) to determine the most suitable approved disinfectant for our application.

ISO14001:2015 Certification

The business is Certified to ISO14001:2015. At the last external surveillance audit in January 2024, there were no major or minor non-conformities, and no identified opportunities for improvement. There were 12 positive observations recognising examples of best practice. 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, and when 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 January 2024, there were no major or minor non-conformities, and no identified opportunities for improvement. There were 12 positive observations recognising examples of best practice.

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.

In 2024, we have continued to improve safety including a focus on asbestos risk (although asbestos is permitted under the new permit, we still regard asbestos as contamination. We also introduced new projects looking at risks like knife and syringe safety. This follows on from the work we carried out last year to improve vehicle and pedestrian safety, improved ventilation, new heating systems, new flooring to improve thermal protection and, and new safety footwear to improve employee safety and comfort. In 2023, our efforts to improve health and safety were recognised by a Commended award at the UK Annual Safety & Health Excellence Awards. In 2024, we were again shortlisted, this time in a different category.

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 January 2024, 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.

In 2024, we also achieved the Constructionline Gold Standard. 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 policies²³. Being Gold 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 ([Cyber Essentials 2024/25](#)). 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
- 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 Change

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.

SUITABILITY OF CONTROLS

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 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 2024. In 2024, Fresh Start Waste received a Commendation at the National Safety and Health Excellence Awards for the work that we had done to ensure legal compliance with safety regulations. In 2025 we were shortlisted in the same awards for actions to reduce driver risk which had already culminated in a 23% reduction in Fleet Insurance costs.

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 did not experience a RIDDOR Reportable event throughout the whole of the 2024/2025 year.

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. This system provides both early detection and increased protection for our employees. Increased controls culminated in a reduction in insurance premium in 2024/25.

OPERATIONAL MANAGEMENT

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

The Processing Operations 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.

CONTROL OF WASTE

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, it's 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, it's 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 | • Dry Mixed Recycling |
| • Paper and Card | (cardboard, textiles, paper, plastics, etc.) |
| • Biodegradable kitchen waste | • General Waste |
| • Green waste | • Other materials |
| • Glass | |
| • Construction & Demolition | |

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.

ORGANISATIONAL 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.

CAPACITY MANAGEMENT

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.

WASTE INFORMATION CONTINUITY

Information is recorded on our live computer system at the point 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.

CONTROL OF GENERATED WASTE

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.

RISK FROM PLANT

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.

In 2024, all statutory inspections of plant and equipment were removed from the equipment provider or repair and maintenance organisation and transferred to HSB, a well respected and reputable organisation with a respected record in the examination of Lifting Equipment and Pressure Systems. All sites were audited and the list of equipment updated to include those needing inspection by law and by good practice.

Also in 2024, a new Bailer was purchased to replace an older model, and a full Provision and Use of Work Equipment Risk Assessment was carried out. Although the bailer is legally compliant, there are planned improvements to further enhance safety in operation.

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

COMPETENCE

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.

KNOWLEDGE, AWARENESS, UNDERSTANDING AND SKILLS.

As well as setting out the job purpose and key responsibilities, 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.

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 three 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 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.

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.

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.

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.

CORRECTIVE, PREVENTIVE, 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 14th November 2024. The Officers recorded the following observations:

- Waste materials were being stored, handled and processed outside as part of a legacy design. Although the waste was stored outside, it was well managed, and this was reflecting in zero waste emission complaints from neighbours. Fresh Start has recently acquired a new building and is working with the council to move these operations indoors. Under Section 2 of the new permit, Fresh Start, as an operator of existing facility (permits issued before 18 December 2024) have until the 19 December 2025 to comply with this requirement. Fresh Start has acquired a new facility and will be submitting planning permission soon to enable the process to move inside.
- There were some areas that need to be re-concreted. This work was completed within two weeks of the issue being identified. There is already an annual audit in place to identify areas that need additional work. The Glass and Food Bays have been added to that review list.
- Glass materials which are stored, bulked and shipped (without additional processing) showed contamination because of customers putting non-glass waste into waste bins. Drivers and customers have been reminded of the importance of ensuring that waste is streamed correctly. As a result, a change has been made to the waste code for the onward shipping of waste, but there have been no changes to the destination, and the arrangements for the onward processing of the material remain unchanged.

IMPROVEMENTS

During the last PAS402 audit, there were some recommendations made to improve site organisation, safety, and compliance. The audit took place at a time when all local energy from waste operations had closed. A similar event took place at the same time last year, and this has led us to update the risk section of the report. Alternative destinations were identified for the waste (which will be reflected in the 2025/26 report). At the time the report was finalised, the site had returned to normal, and some initial lessons learned have been identified. In the meantime, the team are working hard to maintain the site in good order.

One feature of this event (looking back) is that it appears to have some seasonal correlation. We are investigating this further.

PERFORMANCE REVIEW

PERFORMANCE SUMMARY

Performance Summary	Q1	Q2	Q3	Q4	Year
Total Material Inputs this period	19,267	17,888	16,521	15,679	69,355
Waste used/retained on site this period	0	0	0	0	0
Waste remaining on site at the end of this period (unprocessed)	50	230	80	100	N/A
Waste remaining on site at the end of this period (processed)	133	457	194	183	N/A
Total waste remaining on site at end of this period	183	687	274	283	N/A
Waste sent off site for reuse/repair this period	0	0	0	0	0
Waste sent off site for recycling this period	3,332	3,930	3,850	3,384	14,496
Waste sent off site for energy recovery this period	6,435	5,151	4,562	4,271	20,418
Qualifying fines	0	0	0	0	0
Nonqualifying fines	144	184	150	228	707
Materials sent offsite as non-waste	0	0	0	0	0
Waste sent off for disposal (incineration without energy recovery)	0	0	0	0	0
Waste sent off for disposal to landfill	0	0	0	0	0
Total materials sent off site this period	18,747	18,079	16,799	16,031	69,656

ANNUAL RECOVERY AND DISPOSAL TONNAGES

Material In				Material Out			
General Waste	20 03 01	Other Waste: Mixed Municipal	38,996	20 03 01	Other Waste: Mixed Municipal	34,041	Energy From Waste
				19 12 12	Other Wastes: Non-hazardous	5,041	
	20 03 07	Other Municipal: Bulky	47	19 12 12	Other Wastes: Non-hazardous	47	
	19 12 04	Mechanically Treated Plastic or Rubber	237	19 12 12	Other Wastes: Non-hazardous	237	
	19 12 12	Other Wastes: Non-hazardous	185	19 12 12	Other Wastes: Non-hazardous	185	
	20 01 11	Mixed Municipal Waste: Textiles	20	19 12 12	Other Wastes: Non-hazardous	20	
		Sub Total In	39,485		Sub Total Out	39,571	
Dry Mixed Recycling	15 01 06	Waste Packaging: Mixed	11,554	20 01 40	Waste Fractions: Metals	135	Recycling
				20 01 39	Mixed Municipal Waste: Plastic	63	
				19 12 01	Mechanically Treated Waste: Paper and Card	3,506	
				19 12 12	Other Wastes: Non-hazardous	7,143	Energy From Waste
				19 12 12	Other Wastes: Non-hazardous Fines	707	Reprocessing
		Sub Total In	11,554		Sub Total Out	11554	
Wood	15 01 03	Waste Packaging: Wood	61	19 12 07	Mechanically Treated: Wood Non-Hazardous	61	Recycling
	20 01 38	Municipal Waste: Non-hazardous Wood	810	19 12 07	Mechanically Treated: Wood Non-Hazardous	810	
	17 02 01	Construction and Demolition: Wood	5	19 12 07	Mechanically Treated: Wood Non-Hazardous	5	
	20 02 00	Garden and Park Waste	8	19 12 07	Mechanically Treated: Wood Non-Hazardous	2	
				20 01 38	Municipal Waste: Non-hazardous Wood	33	
		Sub Total In	884		Sub Total Out	911	
Construction	17 09 04	Construction: Other: Non-hazardous	4,555	17 01 02	Construction: Bricks	670	Recycling
				17 01 01	Construction: Concrete	286	
				17 04 05	Construction: Metals: Iron and Steel	13	
				19 10 01	Processed Waste: Shredded Metals	183	
				19 12 07	Mechanically Treated: Wood Non-Hazardous	231	
				19 12 12	Other Wastes: Non-hazardous	3,032	
				17 09 04	Construction: Other: Non-hazardous	140	
	17 01 01	Construction: Concrete	54	17 01 01	Construction: Concrete	54	
	17 01 02	Construction: Bricks	10	17 01 02	Construction: Bricks	10	
	17 01 03	Construction: Tiles and Ceramics	8	17 09 04	Construction: Other wastes	8	
	17 05 04	Construction: Soil and Stone (Non-hazardous)	275	17 09 04	Other Wastes: Non-hazardous	275	
	17 02 02	Construction: Glass	237	19 12 12	Waste from treatment: Other (Glass)	220	
	17 08 02	Construction: Non-hazardous Plasterboard	175	17 08 02	Construction: Non-hazardous Plasterboard	172	
				17 09 04	Construction: Other: Non-hazardous	20	
			Sub Total In	5,314		Sub Total Out	
Plastic	15 01 02	Waste Packaging: Plastic Packaging	69	15 01 02	Waste Packaging: Plastic Packaging	63	Recycling
				20 01 39	Mixed Municipal Waste: Plastic	6	
	20 01 39	Mixed Municipal Waste: Plastic	283	20 01 39	Mixed Municipal Waste: Plastic	335	
		Sub Total In	352		Sub Total Out	404	
Paper & Cardboard	19 12 01	Mechanically Treated Waste: Paper and Card	25	19 12 01	Mechanically Treated Waste: Paper and Card	25	Recycling
	20 01 01	Municipal Waste: Paper and Cardboard	1,558	19 12 01	Mechanically Treated Waste: Paper and Card	1,218	
				20 01 01	Municipal Waste: Paper and Cardboard	340	

		Sub Total In 1,583		Sub Total Out 1,583			
Metals	19 12 03	Wastes from mech treatment: non-ferrous	23	19 12 03	Wastes from mech treatment: non-ferrous	23	Recycling
	20 01 40	Municipal Waste: Metals	38	20 01 40	Waste Fractions: Metals	13	
				19 12 03	Wastes from mech treatment: non-ferrous	25	
	19 10 01	Processed Waste: Shredded Metals	1	19 12 03	Wastes from mech treatment: non-ferrous	1	
		Sub Total In 62			Sub Total Out 62		
Glass	20 01 02	Municipal Waste Glass	5,818	19 12 12	Waste from treatment: Other	5,818	Recycling
		Sub Total In 5,818			Sub Total Out 5,818		
Biodegradable Food Waste	20 01 08	Biodegradable Kitchen Waste	4,265	20 01 08	Biodegradable Kitchen Waste	4,401	Energy From Waste
	20 02 01	Biodegradable Waste	29	20 01 08	Biodegradable Kitchen Waste	29	
	02 07 04	Waste beverages unsuitable for consumption	9	20 01 08	Biodegradable Kitchen Waste	9	
		Sub Total In 4,303			Sub Total Out 4,439		
		Grand Total In 69,355			Grand Total Out 69,656		

MATERIAL PROCESSED PER WASTE HIERARCHY CATEGORY

Waste Hierarchy	Q1		Q2		Q3		Q4		Year	
Reuse	0	0%	0	0%	0	0%	0	0%	0	0%
Repair	0	0%	0	0%	0	0%	0	0%	0	0%
Recycle	3,476	35%	4,114	44%	4,000	46%	3,613	46%	15,203	22%
Energy Recovery	6,435	65%	5,151	56%	4,562	53%	4,271	54%	54,453	78%
Landfill cover	0	0%	0	0%	0	0%	0	0%	0	0%
Disposal	0	0%	0	0%	0	0%	0	0%	0	0%

LANDFILL DIVERSION

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

Diversion From Landfill	Q1	Q2	Q3	Q4	Total
Total diverted from landfill (tonnes)	18,747	18,079	16,799	16,031	69,657
Total diverted from incineration without energy recovery	18,747	18,079	16,799	16,031	69,657
Total diverted from landfill (%) and/or incineration without energy recovery	100%	100%	100%	100%	100%

As the only operator of the PAS 402 scheme in the North-West of England, we are obligated to record that our waste materials do not go to a PAS 402 Certified site, so onward processing of materials cannot be Certified.