



Aberdeen Harbour Expansion Project

Construction Environmental Management Document

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DRAGADOS

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Waste Management Plan

Revision Log

Revision Number	Date	Location of Revision	Revision Details
Rev 2	16/05/2018	Front of Document	Document updated to Rev 2 and date updated
		Section 18.2, Table 18.1	Table updated to remove individuals names Table updated to reflect that the Environmental Manager will act as the Site Waste Manager
		Section 18.6.3	Reference to Jan de Nul removed from document. Volumes of dredge material updated as per revised Marine Licence
Rev 3	08/10/2019	Section 18.11	Changed mention of Site Waste Manager to Environmental Manager
		Section 18.15	Changed requirement for monthly update to WMP and changed to monthly waste report. WMP will instead be updated as and when required.
Rev 4	21/10/2019	Throughout the document	Aligned the document format Changed references from Disposal to deposit of dredge material.

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18 Waste Management Plan

18.1 Introduction

This Waste Management Plan (WMP) has been developed to cover the construction phase of the Aberdeen Harbour Expansion Project (AHEP).

The WMP demonstrates consideration of resources and waste during the design stage of the project and the ways in which effective and sustainable waste management will be delivered during the construction phase of the development.

The aim of this plan is to enhance project performance, provide cost savings, comply with contractual requirements and environmental legislation, and to promote improved working practices on site.

It applies to the minimisation, storage and disposal of all waste generated during all construction phases of the project.

The development of a WMP, is required under condition 3.2.4 of both the Marine Licences for Construction and Dredging & Deposit. It is also a condition listed within the Harbour Revision Order, Schedule 2, therefore this Plan is considered to fulfil these requirements.

The Environmental Manager will be responsible for ensuring that the strategy and requirements of this WMP are implemented on the project. The Environmental Manager will need to ensure all relevant documentation is completed and held on site. In addition, all staff are responsible for adhering to the requirements of the WMP.

The WMP:

- Identifies a single person responsible for waste management;
- Estimates the types and amounts of waste to be generated during the contract; and
- Establishes quantifiable targets for the elimination, reduction, re-use and recycling of all types of waste, including excavation.

This WMP is a working document which will be updated as required during the duration of the AHEP. Where a change is required, the WMP will be updated by the Environmental Manager, who will record the change in a new version of the WMP and record the date and details of the change on the attached version control sheet. The Environmental Manager will update Interested Parties of any changes where necessary.

18.2 Roles, Responsibilities and Cross-Referencing

The individuals listed in Table 18.1 are responsible for implementing the requirements of this WMP.

Table 18.1: WMP Responsibilities

Job Title	Responsibilities
Compound Package Managers	To ensure that all staff, contractors and sub-contractors responsible for waste management have access to this WMP. Evaluate waste management and treatment options. Monitor waste KPIs. Provision of toolbox talks related to waste management in conjunction with the Environmental Manager.
Environmental Manager	Will act as the Site Waste Manager and will be responsible for legal compliance at the AHEP site, and ensuring waste contractors and waste management facilities are appropriately licensed and permitted. Provision of toolbox talks relating to waste management.
Construction Manager	To produce a waste forecast based on the construction activities to be carried out on site. To establish take back schemes with suppliers where possible.

18.2.1 Cross-Referencing

The WMP should be read in conjunction with the following CEMD's:

- Pollution Prevention Plan; and
- Dredging and Dredge Spoil Disposal Management and Monitoring Plan.

18.3 Legislation

The Compound Package Manager, with the support of the Environmental Manager and Construction Manager, is responsible for the implementation of this WMP and for ensuring that activities on site comply with the requirements of all waste and environmental legislation including:

- The Waste Framework Directive 2008/98/EC;
- The Environmental Protection Act 1990¹;
- The Environment Act 1995;
- Special Waste Amendment (Scotland) Regulations 2004²;
- Scotland's Zero Waste Plan³;
- The Waste (Scotland) Regulations 2012⁴; and
- Waste Electrical and Electronic Equipment Regulations 2013.

¹ The Environmental Protection Act 1990 c.43

² Special Waste Amendment (Scotland) Regulations 2004 SSI 112

³ Scottish Government (2010) Scotland's Zero Waste Plan;

<http://www.zerowastescotland.org.uk/sites/files/zws/zero%20waste%20plan%2009062010%20document%2001.pdf>; Accessed: 09 October 2016

⁴ The Waste (Scotland) Regulations 2012

18.4 Policy and Targets

The WMP has been developed in compliance with the following policies, documents and strategies:

- The Contract Requirements;
- Aberdeen Harbour Health, Safety and Environmental Policy;
- Aberdeen Harbour Code of Practice⁵; and
- AHEP Environmental Statement.

18.4.1 Aberdeen Harbour Code of Practice

Aberdeen Harbour Board (AHB) have an accredited Environmental Management System (EMS) to manage their environmental impacts, which includes a commitment to promote the reduction of waste and to encourage resource efficiency. AHB have developed an Environmental Code of Practice for Contractors which requires contractors to establish quantifiable targets for the elimination, reduction, re-use and recycling of all types of waste, including demolition and excavation arisings.

The Code of Practice also identifies that it is not always clear whether a material meets the legal definition of waste. For example, even if a contractor considers excavated soil generated on site to be a raw material or a 'non-waste' it may still be classified as 'waste'. Therefore, the Site Waste Manager shall seek advice from the Scottish Environment Protection Agency (SEPA) to clarify any uncertainties in relation to waste.

Dragados have an ISO 14001 accredited EMS to manage their environmental impacts. This will be implemented at the project level using the Environmental Plan document, which can be found within the Construction Environment Management Document (CEMD). The Environmental Plan will apply to all individuals working on the site, including sub-contractors.

18.4.2 Project Waste Targets

To drive the project's commitments to sustainable resource and waste management a number of waste targets have been established which aim to drive good practice. These are to:

- Re-use, recycle or recover at least 90% of clean excavated terrestrial materials;
- Re-use, recycle or recover at least 85% of construction waste;
- Re-use, recycle or recover at least 75% of general waste; and
- Re-use, recycle or recover at least 15% of clean dredging materials.

⁵ Aberdeen Harbour (2016) *Environmental Code of Practice for Contractors General Requirements Version 3 April 2014*

18.4.3 Key performance indicators

This WMP has been developed to meet the requirements of Key Performance Indicators (KPIs). The WMP will include data that can be submitted to Dragados and/or AHB to report on project performance. These include:

- Quantities of waste produced on the project;
- Quantities of Special Waste produced on the project;
- Quantities of waste recycled on the project;
- % of Material Re-used or Recycled (as proportion of Excavation Waste Produced);
- % of Material Re-used or Recycled (as proportion of Dredged Material Produced); and
- % of Waste Re-used or Recycled (as proportion of Construction Waste Produced).

The KPIs will be monitored on site by the Site Waste Manager, overseen by the Environmental Manager, and reported back to the Quality and Environmental Directorate at Dragados.

18.5 Project Waste Forecast

The waste forecast for all phases of the project will be estimated by the Construction Manager before construction works commence on the scheme.

18.6 Waste Management Options

Wastes generated will be managed in accordance with the waste hierarchy shown in Figure 18.1. The waste hierarchy places waste prevention as the priority in terms of how waste should be managed, followed by re-use, recycling and other forms of recovery. Disposal to landfill or incineration without energy recovery are considered the least favourable solutions.

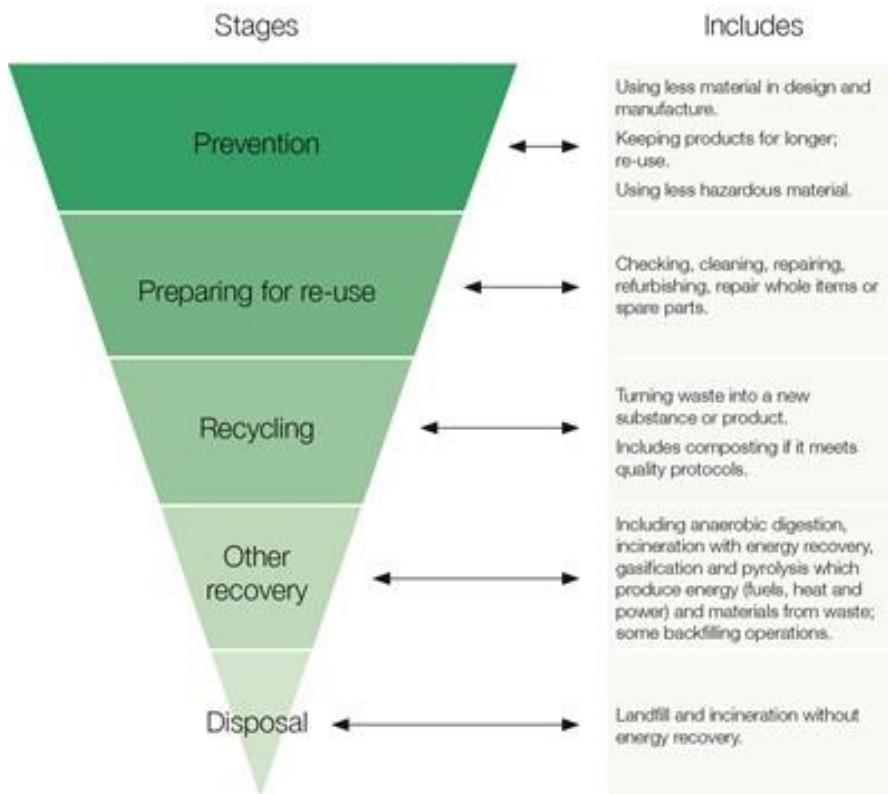


Figure 18.1: The Waste Hierarchy

18.6.1 Designing out Waste

Designers can play a key role in reducing the amount of waste generated during an infrastructure project. By considering materials and waste throughout the design process it is probable that more significant opportunities for resource efficiency can be identified.

The most significant opportunities for designing out waste are likely to occur in the early stages of the detailed design process. The actions undertaken throughout design stages will, however, determine levels of material consumed and waste generated during construction, maintenance and operational phases of a project.

According to the Waste and Resources Action Programme (WRAP) there are five principles relating to designing out waste as detailed below:

- Design for re-use and recovery;
- Design for offsite construction;
- Design for materials optimisation;
- Design for waste efficient procurement; and
- Design for deconstruction and flexibility.

The actions identified to design out waste on the project are displayed below:

- The project team will strive to re-use excavated materials on site where feasible;
- Land reclamation activities to the rear of the quayside installations will use materials recovered from dredging operations where feasible;

- All dredged and excavated rock will be re-used;
- Dredged sand and sediment material will be re-used inside the caissons where possible;
- There are precast elements across the project; and
- Caissons will be fabricated off site in mainland Spain utilising an efficient slipforming process and transported to the site by barge.

18.6.2 Earthworks

The AHEP has established a target to re-use, recycle or recover at least 90% of terrestrial excavation waste to drive good practice and the project team are striving to re-use all excavation materials on site where feasible.

Alternative recovery routes for excess excavated materials will be investigated such as off-site treatment. Any residual waste would be sent for disposal at an appropriate landfill site.

A potential contamination risk was identified during the terrestrial site investigation (SI) process, namely the presence of made ground in the southern compound. It may not be possible to re-use all excavated materials on site if contamination is found to be present.

The SI work completed to date as well the future SI works are intended to minimise unexpected contamination. Contaminated materials will be segregated from 'clean' excavated materials to avoid cross-contamination before they are sent for appropriate and permitted treatment, recovery or disposal.

In addition, Zero Waste Scotland and Resource Efficient Scotland have developed a Construction Materials Exchange (CME) which enables construction projects to list surplus materials. This site shall be used to highlight any surplus materials from the proposed development⁶.

18.6.3 Dredging

A capital dredging operation will form the inner harbour and entrance. It is proposed to dredge the harbour to 9.0 m below Chart Datum, and 12.95 m below Chart Datum at the east quay and 10.50m below Chart datum in the entrance channel.

A Dredging and Dredge Spoil Disposal Management and Monitoring Plan developed by the dredging contractor can be found within Chapter 7 of the CEMD. This Plan outlines the approach for the environmental management and monitoring of the dredging and dredged material disposal activities.

A range of treatment and disposal options have been identified and assessed as part of a Best Practicable Environmental Option (BPEO)⁷ assessment.

⁶ Zero Waste Scotland (2015) Construction Material Exchange; <http://cme.zerowastescotland.org.uk/>;
Accessed: 09 April 2015

⁷ Aberdeen Harbour Expansion Project (2015) Best Practicable Environmental Option (BPEO) Assessment

Where feasible dredged material (particularly gravel and larger pockets of coarse material) will be re-used. All dredged or excavated rock will be re-used. The revised Marine License application has identified that up to 660,000m³ of dredged spoil will be re-used on site.

The quantity of material re-used on site will not exceed the quantity set out within the Marine Licence. If, at a later date, the Environmental Manager has reason to believe that the quantity of dredged material to be re-used on site will exceed this amount for any reason, they will consult with SEPA and apply for a Paragraph 19 Exemption for the re-use of dredged material.

The dredged material which cannot be re-used will be disposed at the authorised offshore deposit site CR110-Aberdeen, located approximately 3.5 km offshore of Nigg Bay in water depths of 35 to 50 metres. The revised Dredging Licence application will request for a maximum quantity of 2,190,000m³ capital dredge spoil to be deposited at CR110-Aberdeen.

18.6.4 Construction

A target to re-use, recycle or recover at least 85% of construction waste to has been established, to drive good practice.

Efficient use of materials will make a major contribution to reducing the environmental effects of construction including reducing demand for landfill and the depletion of finite, natural resources through:

- Minimising the overall creation of waste resulting from, for example, over ordering or inefficient design;
- Reducing the quantity of material sent to landfill during the construction process through effective waste management;
- Recycling materials already on the construction site into the new construction project; and
- Using more recycled materials and mainstream products with higher recycled content.

18.7 Waste Management Strategy

The waste management strategy will be implemented in line with the waste hierarchy, aiming to promote waste reduction, and re-use and recycling of material on site where possible. This key waste streams generated by the AHEP are summarised in Table 18.2. The measures identified are informed by the waste types likely to be produced during the project.

The processing and re-use of excavated materials, including, both on and off the site will follow waste regulations as necessary.

Table 18.2: Outline Waste Management Strategy Aberdeen Harbour Expansion Project

Work Stream	Material Type	Category	Waste Management Options	Management Strategy
Excavation	Soils and stones	Inert	Re-use on site or disposal	Excavated materials will be stockpiled and re-used on site where feasible.
	Contaminated Soil	Special	Treatment on site or off site	Dragados will evaluate whether any excavated waste produced on site is Special Waste or not and commission Waste Acceptance Criteria (WAC) tests as required. If contaminated soils arise on site these will be segregated in stockpiles on site away from all water courses and waterbodies. All Special Waste must be source segregated before treatment and / or disposal and then independently moved to a secure collection point. It is then collected by a specialist contractor and transferred for appropriate and permitted treatment, recovery or disposal.
	Vegetation	Non-hazardous	Recycle on site Treatment off site	Vegetation will be sent for off-site composting.
Dredging	Rock	Non-hazardous	Re-use on site	All dredged rock material will be re-used on site.
	Gravel and larger pockets of coarse material	Non-hazardous	Re-use on site	Where feasible these dredged materials will be re-used on site.
	Sediment and sand	Non-hazardous	Disposal at Offshore Site	The majority of the dredged material will be disposed at the authorised offshore disposal site CR110-Aberdeen, located approximately 3.5 km offshore of Nigg Bay in water depths of 35 to 50 metres.
	Drill cuttings	Non-hazardous	Disposal at Offshore Site	Drill cutting waste is likely to be generated during the dredging phase, however oil based drilling muds will not be used. Drill cutting will be disposed with the dredged material at the licensed offshore disposal site CR110.

Work Stream	Material Type	Category	Waste Management Options	Management Strategy
	Waste relating to blasting explosives	Non-hazardous	Disposal at Offshore Site	Waste relating to blasting explosives will be disposed with the dredged material at the licensed offshore disposal site CR110.
	Various waste oils and lubricants	Special	Treatment as Special Waste Residual waste to Special Waste Disposal Facility	All Special Waste must be source segregated before treatment and / or disposal and then independently moved to a secure collection point. It is then collected by a specialist contractor and transferred for suitable treatment and / or disposal. Special Waste shall be recycled where possible (e.g. oils and solvents).
Construction	Concrete	Inert	Re-use onsite Return to supplier Recycle on site Recover off site where feasible Residual waste to landfill	Concrete will be batched on site. Care will be taken to ensure waste is minimised during this process. Investigations will be undertaken to identify if any excess concrete can re-used new batches. Awareness shall be raised about importance of effective handling. If additional concrete has to be delivered to the site a take-back scheme will be established for excess concrete with suppliers. Investigations will also be undertaken to determine whether concrete can be crushed on site for use as aggregate or fill material where it is not possible to re-use it in its current form. Where this is not feasible the concrete waste shall be recovered off site.
	Other inert	Inert	Recovered off site where feasible Residual waste to landfill	All inert waste shall be segregated for off-site recycling or recovery.
	Metals	Non-hazardous	Recycle off site	All metals shall be segregated for off-site recycling.
	Plastics	Non-hazardous	Recycle off site	Plastics shall be segregated for off-site recycling.
	Paper and Cardboard	Non-hazardous	Recycle off site	Paper and cardboard shall be segregated for off-site recycling.

Work Stream	Material Type	Category	Waste Management Options	Management Strategy
	Timber	Non-hazardous	Return to supplier Recycle offsite	Storage pallets shall be returned where possible. Wood waste will be segregated into a separate container so that off-site recycling can occur.
	Glass	Non-hazardous	Recycle off site	Glass will be segregated into a separate container so that off-site recycling can occur.
	Mixed waste	Non-hazardous	Materials Recovery Facility (MRF) Permitted landfill facility	Residual waste must be placed into a skip labelled mixed waste. Investigations shall be undertaken to identify potential recovery options for all other waste. This could include the possibility of sending waste to local MRF, if available.
	Pile arisings	TBC	Reuse onsite where feasible Treatment offsite where feasible Residual waste to landfill	Waste will be generated during piling activities. The classification of waste related to pile arisings will need to be identified. The piling waste produced on site will be assessed to classify whether it is a Special Waste or not and commission Waste Acceptance Criteria (WAC) tests as required.
	Paint Tins	Special	Treatment as Special Waste Recovery where feasible Residual waste to Special Waste Disposal Facility	Empty paint tins arising on site will be segregated in stockpiles on site away from all water courses or water-bodies. All Special Waste must be source segregated before treatment and / or disposal and then independently moved to a secure collection point. It is then collected by a specialist contractor and transferred for suitable treatment and / or disposal.
	Various waste oils and lubricants	Special	Treatment as Special Waste Residual waste to Special Waste Disposal Facility	All Special Waste must be source segregated before treatment and / or disposal and then independently moved to a secure collection point. It is then collected by a specialist contractor and transferred for suitable treatment and / or disposal. Special Waste shall be recycled where possible (e.g. oils and solvents).

18.7.1 Take-back Schemes with Suppliers

Wherever possible the Construction Manager will establish take-back schemes with suppliers to accept surplus material not incorporated in the works.

18.7.2 Other Recovery Options

The Environmental Manager will identify potential off site recovery options for all remaining residual waste. Many waste management companies can recover residual waste through technologies such as materials recovery facilities (MRFs) which could help further segregate and divert waste from disposal.

18.7.3 Disposal

Where materials cannot be minimised, re-used, recycled or recovered, waste will be disposed. Where no other waste management option is found to be feasible, wastes will be sent to an appropriately permitted landfill site.

18.7.4 Special Waste

Special Wastes will include oils, oily rags, Waste Electrical and Electronic Equipment (WEEE), some types of paint, etc.

The Environmental Manager in conjunction with the Compound Package Managers must evaluate whether any waste produced on site is special or not and commission Waste Acceptance Criteria (WAC) tests as required.

Special Waste will be correctly labelled, shall not be mixed with non-hazardous waste, securely contained and disposed of by a registered waste carrier for Special Waste. The Duty of Care (DoC) applies to Special Wastes.

The Environmental Manager will retain all consignment notes in accordance with waste collection and transfer by an approved supplier.

18.8 Storage Area

A specific area will be designated and signposted in each compound at the AHEP site to facilitate the separation of materials for potential recycling, salvage, re-use and return. Recycling and waste bins are to be kept clean and clearly marked in order to avoid contamination of materials. If skips are clearly identified, then the bulk of the workforce will deposit the correct materials into the correct skip. The minimum skips required for segregation of waste are likely to be:

- Timber;
- Concrete waste;
- Inert waste;
- Plastic;
- Paper and cardboard;

- Metal;
- Vegetation and food waste;
- Mixed waste; and
- Various Special Wastes.

Waste will be stored in an appropriate manner, depending on its properties, at designated, secure locations more than 10m from watercourses. Waste containers will be labelled to clearly identify which waste they should be used for. Some types of waste may need to be kept in a bund to prevent ground contamination and protect watercourses. Lightweight materials such as paper, cardboard, plastic and wood (sheet materials) will be stored in contained areas or covered skips to prevent materials blowing from containers.

18.9 Management Responsibility

The Environmental Manager will be responsible for legal compliance and undertake the duties inclusive of environmental co-ordination including responsibility for instructing site staff.

The Environmental Manager with assistance from the Compound Package Managers will be responsible for waste management as well as monitoring, supervising, collating and recording information for inclusion in the WMP.

The Environmental Manager will report to the Environmental Directorate at Dragados.

18.10 Procurement

The Procurement Team and sub-contractors will minimise the amount of waste arising on-site through:

- Selecting materials that are durable to reduce negative environmental impacts associated with replacement and maintenance;
- Ordering the amount of materials required as accurately as possible;
- Sourcing materials from local suppliers where possible which can reduce the transport requirements and associated impacts;
- Sourcing materials with a recycled content;
- Investigating the opportunity to purchase sustainable materials (for example FSC accredited timber); and
- Establishing take-back schemes with suppliers to accept surplus material not incorporated in the works.

In addition the Zero Waste Scotland (ZWS) Aggregates Quality Protocol Supplier Directory⁸ will be accessed to identify producers of secondary aggregate which

⁸ Zero Waste Scotland (2015) Aggregates Quality Protocol Supplier Directory; <http://www.zwsaggsuppliers.org.uk/>; Accessed: 09 October 2016

meet the Waste and Resources Action Programme (WRAP) Quality Protocol for inert materials.

18.10.1 Contract Clauses

The Procurement Team will consider including contract clauses into the specification for sub-contractors. Any clause would relate to the delivery of the contract. A clause to ensure good practice in waste minimisation and management as a requirement of the contract could be drafted as follows:

‘With regards to the Employer’s project objective for good practice waste minimisation and management, the Sub-contractor’s responsibilities under this Contract are to:

- *Implement the Waste Management Plan and undertake the measures to minimise, recycle and manage waste contained therein;*
- *Support the principal contractor to achieve an 85 per cent diversion of construction waste and/or recovery of waste from disposal through recycling or recovery; and*
- *The sub-contractor must ensure compliance with legal requirements, and taking all reasonable actions as appropriate for non-compliance.*

18.11 Communication and Training

The Compound Package Managers will re-iterate their objectives in terms of sustainable resource and waste management to the supply chain through communication at the onset of the construction phase. There are a number of opportunities to achieve this, such as:

- Waste Management workshop with key sub-contractors to communicate the WMP and discuss resource efficiency opportunities on the project;
- The sub-contractors shall identify a 'Waste Champion' who will be the primary point of communication regarding waste performance and will be responsible for disseminating information within their own organisation;
- Further communication in relation to waste shall be undertaken by the Environmental Manager on-site. Communication on what is trying to be achieved, involvement of people at all levels and feedback sessions to resolve any problems are crucial to ensuring that all staff recognise the importance of the WMP;
- The Environmental Manager in association with the Compound Package Managers will implement a programme of environmental training for all key staff at the site. This will enable them to train other operatives on waste management through toolbox talks and gather feedback from site personnel; and
- Other staff and sub-contractors will be provided with appropriate training from the key staff as part of site induction and at intervals throughout the life of the project such as Toolbox Talks.

18.12 On Site Practice

Good practice will be implemented on site to ensure waste is managed effectively. While reduction of waste will remain the first priority, waste produced will be segregated on site. This will allow materials to be re-used or recycled and will ultimately reduce the amount of waste that has to be finally disposed of to landfill.

18.12.1 Site Induction and Toolbox Talks

Where required, the Compound Package Manager will manage and provide on-site instruction of appropriate segregation, handling, re-cycling, re-use and return methods to be utilised by all parties at the appropriate stages of the Project. Site induction training for all staff will include waste management as a mandatory topic.

Toolbox talks will be carried out on waste issues every 2 months, as a minimum, and all relevant staff and sub-contractors will be expected to attend. The WMP will also be communicated to relevant parties during the site induction process and where relevant, during the daily briefing process. Any changes to the WMP will be communicated at Toolbox Talks.

18.12.2 Environmental Training for Key Staff

The Environmental Manager and Compound Package Manager will implement a programme of environmental training for key staff at the site. This will enable them to train other operatives on waste management through Toolbox Talks and to gather feedback from site personnel.

18.12.3 Method Statements

Where appropriate method statements will be developed for site works in accordance with the WMP. The method statements will include as a minimum:

- The safe handling of materials and waste;
- The management of waste including segregation, storage and collection; and
- The management of Special Waste.

18.12.4 Sub-Contractors

The Construction Manager in association with the Dragados procurement department will establish agreements with sub-contractors for the management of waste.

18.13 Legislative Waste Documentation

18.13.1 Environmental Permits

The Environmental Manager will identify waste management facilities for the management of all waste streams arising from the project. When the waste management facilities have been identified, the Environmental Manager will update

this WMP to include the name and authorisation number of the chosen waste management facilities.

The Environmental Manager will request all waste management facilities (e.g. recycling or landfill site) provide copies of the appropriate Environmental Permit and records will be maintained on site.

In addition the waste management facilities, where feasible, will be situated as close to the project as possible, in line with the proximity principle for waste treatment.

18.14 Duty of Care

The Compound Package Manager must ensure that the waste carrier issues a Waste Transfer Note (WTN) or Consignment Note (for Special Waste) before each movement of waste. The Notes must be signed, dated and must adequately quantify and describe the waste, including the relevant European Waste Catalogue (EWC) code, and where it came from.

The Environmental Manager will ensure a detailed and current register is maintained of every waste transfer that occurs during the contract. The register will be stored in the site office and be available for inspection by Aberdeen Harbour and will include:

- All WTNs or Consignment Notes generated during the contract;
- A record of every carrier removing waste from the site during the contract, including a copy of their Waste Carrier Certificate of Registration;
- A record of every facility receiving waste from the site during the contract, including a copy of the exemption/permit for those facilities and information about what was done with the waste e.g. whether it was landfilled or crushed for re-use; and
- Copies of correspondence with waste carriers and receivers to show that they understand the nature of the waste being handled, that they have received the relevant WAC tests and that they are capable of receiving that sort of waste and are authorised to do so.

At the end of the contract AHB will be provided with a copy of the waste register.

18.15 Monitoring

Every month Dragados will produce a report indicating progress against the KPI targets, summarising the types and amounts of waste removed from the site during that period and listing all the relevant receivers and carriers. The WMP will be updated as and when required.

Data will be analysed on project completion to compare waste forecast versus the actual quantity generated. This will ensure company WMPs remain effective and enable set waste reduction targets in the future.

For exact and accurate amounts of waste removed from site, electronic data or printed sheets can be requested from the waste management contractor. This will also identify the nature and quantity of materials sent to landfill or recycled.

Skips are to be monitored on a regular basis by the Compound Package Managers and the ECoW during daily site inspections to ensure that contamination of segregated skips does not occur, thus avoiding higher disposal costs. This plan will also be reviewed by the Environment Manager during scheduled audits who will also be responsible for transferring any good practice and solutions throughout the company, where appropriate.

18.16 Availability of the Plan

The Environmental Manager will ensure that the WMP is kept at the site office. They will also ensure that every operative and sub-contractor knows where it is kept, and must make it available to any sub-contractor carrying out work described in the plan.