



LONDON'S ROYAL DOCKS

THE ROYAL DOCKS MANAGEMENT AUTHORITY

The Royal Docks Management Authority (RoDMA)

Waste Management Plan

for the

Operation and Maintenance of London's Royal Docks

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Approval

This document has been approved by the following personnel: -

Name: **Scott Derben**

Signature: _____ Date: _____

Position: Managing Director
Royal Docks Management Authority

Issue Record

Reissues to this document are automatically distributed to personnel once approval is completed.

Reissues are to be completed after each annual review or upon any significant changes to the plan, if sooner.

Reissues are only permitted when authorised by the Managing Director and should be communicated to the workforce.

Issue	Reason for Issue/Reissue	Date of Issue
Draft	First draft	

Introduction

The Royal Docks Management Authority (RoDMA) Waste Management Plan (WMP) builds on the foundations of the successful development of the Royal Docks existing environmental management practices to include the scope of RoDMA Services.

The overall objective of the WMP is to allow the effective provision of RoDMA's day to day business and support services whilst maintaining tolerable level of impact on the local environment.

This objective will be achieved using a systematic approach to:

- Identify stakeholder, legislative and other constraints;
- Review environmental aspects;
- Identify potential environmental risks and impacts;
- Develop the measures used to eliminate or manage those significant risks and impacts.

The WMP provides for the management of environmental impacts for Waste Management at London's Royal Docks. Therefore, it forms part of the environmental management system (EMS) for RoDMA and support services.

Influence from RoDMA

RoDMA wishes to ensure that there is an increasing, overriding policy link within London's Royal Docks regarding environmental and sustainability issues.

The flow of information and guidance is derived from UK Government policy. There is substantial direction in environmental areas such as waste management, sustainability and incident management. However, this WMP will be modified as required to take account of local regulations and requirements. Where any local requirement has a higher requirement than the UK Government requirement, then this higher requirement will become the standard to be applied.

BS EN 14001:2004

This WMP will operate under the foundation of the design for the implementation of an environmental Management System that uses ISO14001, Environmental Management Systems, as an internationally recognised base line standard for environmental management.

Any relevant local standards and policies will be adhered to. This means not only all relevant legislation will be complied with but also customer and other stakeholder agreements will be recognised and followed. Therefore, all relevant local Environmental requirements will also be an auditable part of the Environmental Management System.

An ISO 14001 based environmental management system will provide an effective externally viable and commercially communicable standard for the Royal Docks Management Authority.

Policy

RoDMA will adapt this policy in order to ensure that it is appropriate to the nature, scale and environmental impacts of the company's marine support services operation.

A commitment to conducting activities in an environmentally responsible manner that will protect human health, natural resources and the environment will be made by RoDMA. In doing so, RoDMA will comply with all environmental laws and regulations and non-legal requirements that are applicable to the waste management aspects.

Continual improvement of environmental performance is a key objective of RoDMA's business and support services. As such, RoDMA will integrate sound environmental practices into daily decisions and activities.

RoDMA will provide responsible waste management stewardship for the provision of their business and support services.

General Introduction to Waste Management Plan

It is widely recognised within the international community of maritime states, that in order to leave no excuse for ships to resort to the unacceptable practice of discharging their waste overboard, there must be properly planned system of reception facilities in port, which are easy to use and cost-effective. This is one of the requirements of the International Convention on the Prevention of Pollution by Ships (MARPOL 1973/78)

References:

- a. The International Convention on the Prevention of Pollution from Ships (MARPOL 73/78)
- b. Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulation 2003
- c. Port Waste Management Planning – A guide to good practice. MCA publication dated 22 July 2003
- d. Port Waste Reception Facilities Regulations – Marine Guidance Notices (MGN 253 (M+F) and MGN 259 (M+F))
- e. The Environmental Protection Act 1990
- f. The Environmental Protection (Duty of Care) Regulations 1991
- g. The Hazardous Waste Regulations (Amendment)2011
- h. Landfill (England and Wales) Regulations 2002
- i. Waste Electrical and Electronic Equipment (Amended) Regulations 2013
- j. The Waste Batteries and Accumulators Regulations 2009

Aim of Waste Management Plan

The aim of this Waste Management Plan is:

- To inform all staff at RoDMA about waste handling facilities available to them
- To fulfil the PLA's Statutory requirements with regard to the management of waste
- To consult on developing the management of waste passing through the site
- To assist in ensuring that all wastes are disposed of, so as to minimise any detrimental effect to the environment
- To discourage disposal of waste overboard and/or into the docks.
- To tailor and improve existing waste disposal facilities through regular consultation with all stakeholders, including staff.

Purpose of the Waste Plan

This waste management system is designed to ensure that the areas where the Company's vessels and personnel operate are in compliance with National and International Legislation, and that all personnel ensure that all waste is treated properly and that reception facilities are provided under conditions that reduce or eliminate risk to the environment.

RoDMA has produced this waste management plan for the collection and handling of any generated waste at the site. The primary purpose of the plan is to encourage the regular disposal of waste in an environmentally, sustainable and legally correct manner.

The Plan advises all personnel of the arrangements in place within RoDMA jurisdiction for the disposal of waste in accordance with the relevant Statutory Requirements and MARPOL 73/78.

The Plan also defines procedures that will ensure that waste reception facilities ashore are adequate to meet the needs of waste generated by the company.

The Plan relates to operations at London's Royal Docks.

Responsibility

Managing Director

Responsibility for implementation of the Waste Management Plan rests with the Managing Director who in turn delegates to the Operations Manager.

In deciding what facilities to provide, the Managing Director will have undertaken an assessment of quantities and types of waste that might be deposited at the site.

Managers

Managers are to:

- ensure that all waste is identified and managed in the correct manner in terms of storage, collection and transportation and that the Duty of Care requirements are met
- ensure that contractors comply with all environmental legislation when disposing of waste
- take all necessary actions to reduce waste production

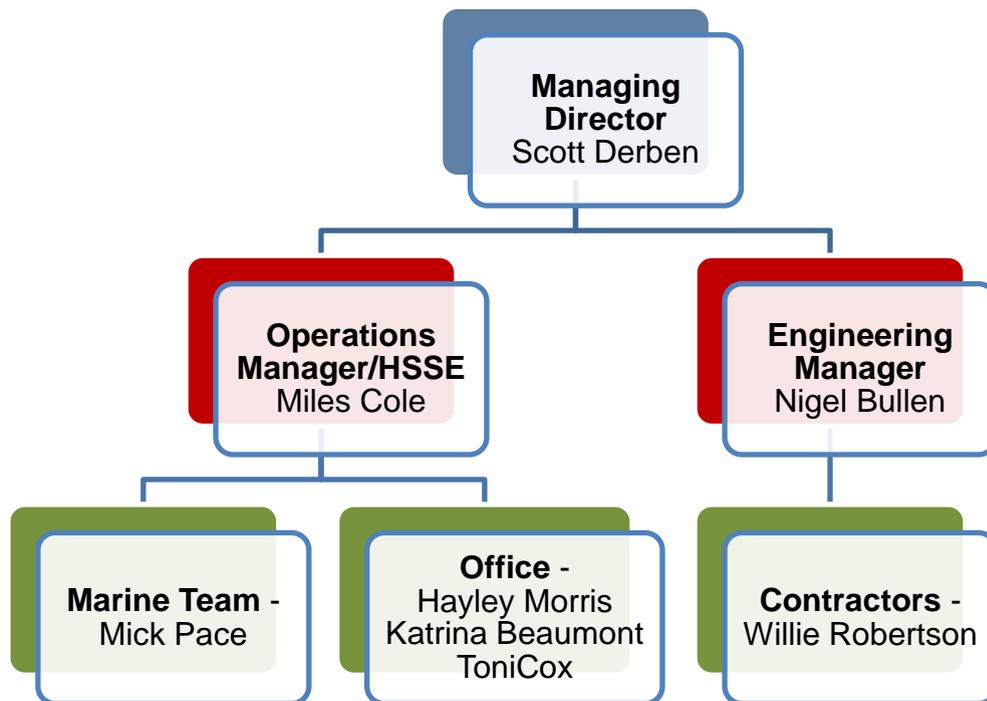
All Employees

Any employee who produces, carries or disposes of waste has a duty of care under the Environmental Protection Act 1990. All instructions on correct segregation and disposal of waste must be followed.

Health, Safety, Security and Environmental Officer

The Health, Safety and Environmental Officer is to:

- Keep abreast of environmental legislation and provide updated information at regular intervals.
- Ensure that the contract and the relevant waste undertakers are in possession of all necessary environmental permits and licenses.



Legislation

The regulations in the references require RoDMA to maintain and keep under regular review this “Waste Management Plan”. The Plan is to include the provision and use of facilities for the reception of prescribed wastes from vessels and other facilities at the site.

Ships

The International Convention on the Prevention of Pollution from Ships (MARPOL 73/78) contains guidance on the requirements for effective waste management. The Annexes of MARPOL refer to specific waste categories. Those that affect the Royal Docks operation and the manner in which that waste is dealt with are contained within this plan.

Shore Based Activities

The Environmental Protection Act 1990, the Environmental Protection (Duty of Care) Regulations 1991 and the Hazardous Waste Regulations (Amendment) 2011 describe the requirements for effective waste management of shore-based activities. Those that affect RoDMA operations and the manner in which that waste is dealt with are contained within this plan.

Plan Revision

Following formal approval of the plan by the Managing Director, updates to the Plan will be considered as a result of periodic review and regular monitoring. Should any proposals for change be considered necessary, the consultation process will continue to apply before any such changes are implemented.

This Plan has an approved life of 3 years from the date of approval by the Managing Director and it will be submitted in its entirety for re-approval prior to that time or if any major changes at the site are likely to affect the volumes or types of waste received.

All revisions will first be submitted to the Managing Director for their formal approval before being incorporated into the manual.

Once approved, revision update(s) will be forwarded to all Plan holders.

Plan Availability

The Waste Management Plan adopted by RoDMA for operations and support services shall be available to all staff and concerned sub-contractors. All sections of the operation will be supplied with a copy of the waste management plan.

Users of the RoDMA Waste Disposal Arrangements

Due to the nature of operations conducted at London's Royal Docks, RoDMA will have full control over vessels/contractors using the facilities. These vessels/contractors will use the waste facilities provided on the site on a permanent basis.

The Need for Waste Reception Facilities

RoDMA will provide adequate reception facilities for vessels operating at the site as a legislative requirement.

Waste reception facilities are important in order to discourage vessels/contractors from dumping waste into the Royal Docks/KVG. The disposing of waste in such manner is no longer acceptable. In the past large volumes of waste have been disposed in this way and as result the environment has suffered.

Waste Management Procedures

It is inevitable that RoDMA will produce waste as a by-product of its activities. As a Company, RoDMA ensures that this waste is managed in an appropriate manner and in compliance with the legislative requirements placed on the Company.

Generally, wastes do not add any value to the company and disposal incurs costs. Therefore, waste should be avoided from an economic point of view as well as, primarily, an environmental consideration. With this in mind RoDMA looks at waste the following way;

- Reduce (Reduce the requirement of purchasing the items that will end up as waste)
- Reuse (Can a different item be purchased that can be used several times rather than once, also can the item presently being used be used again).
- Recycle, (Can the item be segregated, and a recycling company used to give the waste items another uses.)

An example of this is paper;

- Reduce, do we need paper, or can items be electronic copies, or can we print on both sides.
- Reuse, can we use the back of paper if not used.
- Recycle, place in the paper bins provided and the contractor will remove the waste so not mixing in with general waste.

The company will produce the following waste streams;

- General Waste
- Metal Waste
- Hazardous Waste
- Electrical/Electronic Waste
- Oil Waste
- Paper Waste

General waste is waste that can't be recycled and is disposed of into land fill. This must be done by a licensed contractor, whose licences and other applicable paperwork must be supplied to RoDMA before they can remove waste from site.

Metal waste. Most metal waste produced is likely to be mild steel, this is segregated if there are adequate amounts produced at the site. A scrap merchant is then used to dispose of this waste. Again, only Merchants who have provided the appropriate licences and applicable paperwork shall be used.

Hazardous Waste. This is waste that could cause damage to the environment or persons. There is legislation directly concerned with the handling and disposal of such items.

Hazardous waste covers items such as, but not inclusive of:

- Oil
- Oil contaminated items
- Paint/ and unfinished paint tins (unfinished - over 10 % left and not hardened to the tin)
- Chemicals (marked as hazardous or dangerous on the containers or on the safety data sheets)
- Contaminated chemical items (with the same stipulation as above)

An area will be set aside for storage of such waste produced on site; this must comply with legislation when there is legislation pertaining to the control of such substances.

All hazardous waste contractors shall comply with the legislation and shall provide a waste carriers licence and waste management licence, along with other documents that might include a duty of care.

Paint tins are hazardous waste if they still contain more than one tenth of the volume and are still a liquid, so tins will be left to harden before disposal in the metal skip.

All hazardous waste will be identified, with what the container holds and what hazards the item holds.

No hazardous waste should be disposed of in the General waste, as this is against legislation and operators of waste sites are duty bound to take action should this occur.

Electrical and Electronic waste is classified as a form of hazardous waste under the WEEE Regulations 2013. These Items must be disposed of by a licensed disposal company, so the waste carriers license and waste management licences must be provided.

Oil waste shall be provided with facilities to store it until collection. Copies of the applicable licences must be provided before any waste oil contractor can uplift and dispose of it.

Paper waste produced by RoDMA shall be segregated, and a suitable contractor found for recycling. This must include destruction of paperwork so no company information can be obtained from the waste paperwork. If the quantity of paper produced by the site is small, then efforts should be made to use other disposal facilities, perhaps being run by another company

nearby, as it will be difficult to get a quantity that a waste contractor would be prepared to collect.

The company ensures that the storage of waste on its site does not have any detrimental effects on the environment. Waste will be stored in the allocated areas, and in appropriate containers. In the case of liquid, waste bunding will be used to prevent spillages dispersing further if the containers are breached.

All sub-contractors will be required to remove any waste they produce while on site, unless they have the agreement of a company manager to dispose of the items in accordance with the RoDMA waste disposal arrangements.

It is at the company's discretion to cease working with any contractor if it has been found that they have not been working as per agreement with the company or have been found to have unlawful practices.

All contractors that RoDMA use to dispose of its waste shall be asked to provide a current copy of their waste carriers licence and when applicable their waste management licence.

All wastes that are disposed of must have a transfer note provided by the contractor used to carry out the disposal. These are to be kept for audit purposes for at least 2 years.

This is not intended to be an all-inclusive list of the wastes produced by RoDMA at the London's Royal Docks; other wastes will arise due to the operations the company carries out, the company will determine what actions are required in handling and disposal of such wastes, and ensure that all legal requirements are met.

On-Site Controls

The following principles outline good practice for managing waste on site.

- The type of container used for storing waste should be suitable for its intended waste content. Lids will be required for chemical wastes and skips must have appropriate covers to prevent rainwater entering the waste.
- Clear labelling of waste containers and waste collection areas must be in place to ensure that proper segregation takes place.
- Waste storage containers must be regularly checked to ensure that no leaks are occurring due to corrosion, wear or spillage during handling.
- All employees will be briefed by the relevant departmental manager on segregation of waste streams and relevant storage and handling controls.
- Regular monthly inspections of the waste collection areas will be carried out and a checklist completed to ensure compliance with this procedure (see appendix 1).

Receipts Issued by the Waste Contractor Upon Collection

When waste, other than general waste, is collected by a Waste Contractor, the Managing Director, or his representative, is to ensure that the waste collection operator issues a receipt evidencing that the site has delivered waste.

Information filled in this receipt shall be entered into the site's registers of oil, sewerage and other controlled disposals.

Staff should note that at any time any employee of the waste contracting firm may inspect the content of the skip. If any substances that should not be there are located, the site will be charged the full costs of disposal via an appropriate contractor with a subsequent administration charge.

All skips will be removed when full. The Managing Director, or his representative, should monitor the skip levels to ensure that they do not overflow or become a health or environmental hazard.

Waste Related Incidents

Any waste related incidents that result in personal injuries, ill health or environmental damage should be reported on an incident report form.

The Spill Response Procedure includes procedures for contacting external emergency services and outside agencies.

Monitoring

The amount and types of waste should be reviewed each year. Plans should then be designed and implemented for the next year to ensure the company continues to reduce the production of waste.

Audit and Review

An important step in ensuring that RoDMA maintains the integrity of its Environmental Management System is the requirement to undertake regular audits and reviews of its system in order to ensure it is fit for purpose, strives for continual improvement and reduction of risk so far as is reasonably practicable.

The Operations Manager will conduct regular reviews of the waste plan and procedures to ensure that it is being followed as laid down, remains current since the last review (at least on an annual basis), checks on documentary and site controls compliance and report to the H&S committee at its quarterly meetings. Any urgent concerns should be brought to the attention of the Head of Operations and Engineering. Annual audits of the site and RoDMA's Waste Management System will be carried out by our external safety consultancy partner PD'CT Ltd.

Appendix 1 – Waste Management Checklist

No	Item documentation & Briefing	Yes	No	Comment
1	Is the waste collection area clean and tidy?			
2	Is the type of container used for storing the waste suitable for its intended use?			
3	Are lids in place for storage drums and covers on skips etc?			
4	Are waste containers clearly labelled with the type of waste to be deposited?			
5	Does the content of the container match the signs displayed on the container?			
6	Are waste oil-drums stored on/in bunded trays?			
7	Are there any visible signs of leakage, corrosion or damage to the waste storage containers?			
8	Is hazardous and non – hazardous waste clearly segregated and marked up?			
General Comments				

Appendix 2 – Consignment Note for Hazardous Waste

PART A Notification details							
1 Consignment note code: <input style="width: 100px;" type="text"/>		4 The waste will be taken to (name, address and postcode):					
2 The waste described below is to be removed from (name, address, postcode, telephone, e-mail, facsimile):		5 The waste producer was (if different from 2) (name, address, postcode, telephone, e-mail, facsimile):					
3 Premises code (where applicable): <input style="width: 100px;" type="text"/>							
PART B Description of the waste						If continuation sheet used, tick here <input type="checkbox"/>	
1 The process giving rise to the waste(s) was:		2 SIC for the process giving rise to the waste: <input style="width: 100px;" type="text"/>					
3 WASTE DETAILS (where more than one waste type is collected all of the information given below must be completed for each EWC identified)							
Description of waste	List of wastes (EWC code)(6 digits)	Quantity (kg)	The chemical/biological components of the waste and their concentrations are:		Physical form (gas, liquid, solid, powder, sludge or mixed)	Hazard code(s)	Container type, number and size
			Component	Concentration (% or mg/kg)			
The information given below is to be completed for each EWC identified							
EWC code	Packing group(s)	UN identification number(s)	Proper shipping name(s)	UN class(es)	Special handling requirements		
PART C Carrier's certificate			PART D Consignor's certificate				
<p>(If more than one carrier is used, please attach schedule for subsequent carriers. If a schedule of carriers is attached tick here. <input type="checkbox"/>)</p> <p>I certify that I today collected the consignment and that the details in A2, A4 and B3 are correct and I have been advised of any specific handling requirements.</p> <p>1 Carrier name: On behalf of (name, address, postcode, telephone, e-mail, facsimile):</p> <p>2 Carrier registration no./reason for exemption:</p> <p>3 Vehicle registration no. (or mode of transport, if not road):</p> <p>Signature</p> <p>Date <input style="width: 100px;" type="text"/> Time <input style="width: 100px;" type="text"/></p>			<p>I certify that the information in A, B and C above is correct, that the carrier is registered or exempt and was advised of the appropriate precautionary measures. All of the waste is packaged and labelled correctly and the carrier has been advised of any special handling requirements.</p> <p>1 Consignor name: On behalf of (name, address, postcode, telephone, e-mail, facsimile):</p> <p>Signature</p> <p>Date <input style="width: 100px;" type="text"/> Time <input style="width: 100px;" type="text"/></p>				
PART E Consignee's certificate (where more than one waste type is collected all of the information given below must be completed for each EWC)							
Individual EWC code(s) received	Quantity of each EWC code received (kg)	EWC code accepted/rejected	Waste management operation (R or D code)				
1 I received this waste at the address given in A4 on: Date <input style="width: 100px;" type="text"/> Time <input style="width: 100px;" type="text"/>		2 Vehicle registration no. (or mode of transport if not road):					
		Name: On behalf of (name, address, postcode, telephone, e-mail, facsimile):					
3 Where waste is rejected please provide details:							
I certify that waste management licence/permit/authorised exemption no(s). <input style="width: 100px;" type="text"/>							
authorises the management of the waste described in B at the address given in A4.		Signature					
		Date <input style="width: 100px;" type="text"/> Time <input style="width: 100px;" type="text"/>					

Appendix 3 – Waste Transfer Note

Section A – Description of Waste		
1. Please describe the waste being transferred:		
2. How is the waste contained?		
Loose	Sacks	Skip
		Drum
		Other (describe):
3. What is the quantity of waste (number of sacks, weight etc):		
Section B – Current holder of waste		
1. Full Name (BLOCK CAPITALS)		
2. Name and address of Company:		
3. Which of the following are you? (Please tick one or more of the boxes)		
<i>producer of the waste</i>	<i>holder of waste disposal waste management licence</i>	<i>License No: Issued by:</i>
<i>Importer of the waste</i>	<i>exempt from requirement to have a waste disposal or waste Management licence</i>	<i>Give reason:</i>
<i>Waste Collection Authority</i>		
	<i>registered waste carrier</i>	<i>Registration No: Issued by:</i>
<i>Waste Disposal Authority</i>	<i>exempt from requirement to register</i>	<i>Give reason:</i>
Section C – Person collecting the waste		
1. Full Name (BLOCK CAPITALS):		
2. Name and address of company:		
3. Which of the following are you? (please tick one or more boxes)		
<i>Waste Collection Authority</i>	<i>holder of waste disposal or Waste management licence</i>	<i>License No: Issued by:</i>
<i>Waste Disposal Authority (Scotland only)</i>	<i>exempt from requirement to have a waste disposal or waste management licence</i>	<i>Give reason:</i>
<i>Exporter</i>	<i>registered waste carrier</i>	<i>Registration No: Give reason:</i>
	<i>Exempt from requirement To register</i>	
Section D		
1. Address of place transfer / collection point:		
2. Date of transfer:		3. Time(s) of transfer:
4. Name and address of broker who arranged this waste transfer (if applicable):		
5. Signed:		Signed:
Full Name: (CAPITALS) Representing:		Full Name: (CAPITALS) Representing:

Appendix 4 – Waste Management Improvement Programme

Date:	Section:	Overall Responsibility:

Ref. No.	Waste Stream	Action	Target	Planned Completion Date	% Complete	Responsibility	Achievement Detail

