Construction Materials Management Plan

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Contents

REFRENCE DOCUMENTS

- European Commission Waste Framework Directive (2008/98/EC);
- The Waste Management Licensing (Amendment) Regulations (Northern Ireland) 2022.
- Environment Act 2021
- Waste (England and Wales) Regulations 2011
- Controlled Waste and Duty of Care Regulations (Northern Ireland) 2013
- Waste Management Licensing (Amendment) Regulations (Northern Ireland) 2009
- Site Waste Management Plans Regulations 2008 (retracted but used as a guide)
- Environmental Permitting (England and Wales) Regulations 2016
- Clean Neighbourhoods and Environmental Act 2005
- Clean Neighbourhoods and Environmental Order 2002 (NI)
- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Protection Act 1990
- Waste and Contaminated Land (Northern Ireland) Order 1997 SI 2778
- Pollution Control and Local Government (Northern Ireland) Order 1978 SR 1049
- Waste Management The Duty of Care - A Code of Practice (NI)
- PRO EN 02
- CON EN 01, 02, 05

1. INTRODUCTION

1.1. Overview

Viberoptix is committed to minimising waste generation and sustainable waste management in all its operations, grounded in the principles of the circular economy[1]. This Construction Material Management Plan (CMMP) establishes the measures for managing and mitigating waste generation during the construction of network infrastructure by Viberoptix staff members and sub-contractors. It shall always ensure the implementation of best waste management practices and monitoring tools. This CMMP has been prepared in accordance with relevant waste management regulations in England and Northern Ireland (listed below) and is aligned with the requirements of the New Roads and Street Works Act 1991 (NRSWA) to ensure that all street works are carried out in line with legal obligations and best practice guidance, including the Street Works UK (SWUK) Protocol:

- Environment Act 2021
- Waste (England and Wales) Regulations 2011
- Controlled Waste and Duty of Care Regulations (Northern Ireland) 2013
- Site Waste Management Plans Regulations 2008 (retracted but used as a guide)
- Environmental Permitting (England and Wales) Regulations 2016
- Clean Neighbourhoods and Environmental Act 2005
- Clean Neighbourhoods and Environmental Order 2002 (NI)
- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Protection Act 1990,
- Waste Management Licensing (Amendment) Regulations (Northern Ireland) 2009
- The Waste Management Licensing (Amendment) Regulations (Northern Ireland) 2022.
- Pollution Control and Local Government (Northern Ireland) Order 1978 SR 1049
- Waste and Contaminated Land (Northern Ireland) Order 1997 SI 2778

NB: It should be noted that this management plan can be adjusted whenever the regulations are updated.

1.2. Purpose of Construction Material Management Plan

Viberoptix aims to manage all its waste more effectively and in a sustainable manner while reducing potential harm to the environment and human health. Therefore, the purpose of this CMMP is to describe the procedures by which waste will be managed during the construction of fibre network infrastructure, to effectively manage and reduce the amount of overall waste to be produced. The CMMP also outlines the construction strategies applied to minimise waste, responsibilities for waste management, waste monitoring measures, and training provisions for staff members and subcontractors.

1.3. Scope

[1] *Circular economy, prioritises the reuse of materials again and again, preventing the over extraction of natural resources and cuts CO2 emissions (UK government, 2020)*

This CMMP uses the legal definition of waste as defined in the 2008 Waste Framework Directive (2008/98/EC);

"Any substance or object which the producer discards or intends or is required to discard"

Therefore, this definition of waste covers substances and objects that fall outside of the commercial cycle; in particular, materials that are taken off-site by both the company and contracted waste carriers for reuse, recycling, and disposal are considered waste.

To demonstrate good waste and environmental management practice, this CMMP includes Viberoptix's procedures and commitments for waste minimisation and diversion from landfill and setting standards for resource efficiency in accordance with guidance from bodies such as the Department for Environment Food and Rural Affairs (DEFRA), Northern Ireland Environment Agency (NIEA) and the Waste and Resources Action Programme (WRAP). Also, it outlines the requirements of the "revoked" Site Waste Management Plans Regulations (2008) as a guide for:

- Identification of personnel with waste management responsibilities and the waste management action proposed for each different waste type, including: re-using, recycling, recovery, safe and responsible disposal.
- A declaration that waste materials will be handled efficiently and managed appropriately.

Additionally, this CMMP provides a mechanism to judge the effectiveness of all waste minimisation and management in construction of network infrastructure. Thus, it should be reviewed whenever there are changes in operations, regulations and at least annually.

1.4. Type of waste generated

All the types of waste typically generated by Viberoptix are classified and listed below with their status and European Waste Catalogue (EWC) codes.

Table 1. Waste types

Waste type	Status	EWC CODE
Concrete	Non-hazardous	17-01-01
Soil and stone mixtures	Non-hazardous	17-05-04
Wood waste (pallets and reels)	Non-hazardous	17 02 01
Plastic (ropes and duct tubes)	Non-hazardous	17-02-03
Clean packaging (plastic/paper and cardboard)	Non-hazardous	15-01-01 /15-01-02
Mixed metals	Non-hazardous	17-04-07
Waste water	Non-hazardous	13-05-01
Bituminous mixtures and tarmac	Hazardous	17-03-01*
Fibre optics/glass	Hazardous	16-02-15*
Spill kits waste	Hazardous	15 02 02*
Mixed Municipal	Non-Hazardous	20 03 01,

1.5. Area of storage and responsible waste disposal

As a safe and responsible construction operator, all construction waste produced by Viberoptix is stored in assigned areas of site suitable for onward transportation. This includes bunding and relevant containment for non-hazardous and hazardous waste types identified above. Waste will be segregated wherever possible, in order to maximise recycling rates and landfill diversion.

1.6. Description of construction works

Viberoptix, as a Principal Contractor, provides fibre network infrastructure. The cables installation is strategically planned to use the existing infrastructure. In the case of missing inventories and the need for new infrastructure, the company excavates for new poles' installation, constructs duct chambers and moles ploughs for cables cover or burial within the ground. This process produces waste, which Viberoptix is responsible for managing in accordance with the guideline and legal requirements.

2. DESIGNING AND PLANNING INFRASTRUCTURE FOR WASTE REDUCTION STRATEGY

2.1. Design for minimum excavation and waste generation

The most effective intervention possible to effect genuine waste reduction is to avoid generation. However, this is not possible with the nature of our work. Viberoptix has adopted designs for minimum excavation and waste generation principle as a strategy. Where possible excavated material will be reinstated, therefore reducing material taken off-site. With this principle, Viberoptix focuses on using the relevant best available techniques (BAT) to make the most efficient and sustainable use of land in excavations and reduce arisings (waste) without compromising design quality of the infrastructure. As a result, there is a significant reduction in waste generation and excavation costs. Thus, the screen and planned routes for infrastructure installations must be complied with. Also, the crews must follow duct chambers, mole ploughing, trench digging and poles installation measurement specifications provided by Viberoptix build team.

2.2. Selection of construction materials

Sustainability is of high priority in all Viberoptix operations, to ensure this, the company places significant emphasis on material selection in its provision of projects delivery. Current and future materials procurement will always consider waste generation and prioritise circularity.

3. ROLES AND RESPONSIBILITIES

3.1. Managing/Project Directors

- Ensure the implementation of the Waste Management Plan.
- Provide all resources needed for proper waste management.

3.2. Environmental Sustainability and Governance team

- Develop, communicate and establish a sound and sustainable waste management plan and procedures.
- Develop waste management training materials and Toolbox talks for awareness.
- Retain all training sign-off documents and regularly review waste management training needs.
- Undertake internal waste management audits, set key performance indicators (KPIs) for review to ensure continual improvement and communicate goals and objectives to all relevant departments.
- Liaise with the build managers/supervisors to communicate waste management requirements.
- Maintain and keep all records of the Duty of Care, Waste Transfer and Consignment Notes generated for 2 years as required (3 years for hazardous).
- Provide sustainability advice on the procurement of construction raw materials and the onboarding of supplier goods and services.

3.3. Build Managers and Supervisors

- Build managers must ensure that sustainable waste management is applied on all projects.
- Ensure that waste is handled properly and stored on site in line with the company procedures.
- Ensure waste is removed offsite by a fully licenced waste carrier, as agreed with the Procurement Team.
- Ensure all waste documentation and records are correctly completed and returned promptly to the ESG Team.
- Responsible for obtaining and retaining waste records and waste transfer notes or consignment notes (hazardous waste, creosote material, waste oil, and oil-contaminated material) for all waste removed from sites.
- Results of sampling must be uploaded into Street Manager or reported to the Street Works Manager and ESG team.
- Responsible for ensuring planned works for cable installations are within procedural requirements.
- Ensure that the crew staff members and sub-contractor receive and sign off on waste management procedures, training and awareness.

3.4. Civils/Build/Operations Operatives

- Take training on waste management, read and sign off al waste management related procedures and Toolbox talks as required.
- Ensure that waste generated during installations is appropriately handled, segregated following the waste hierarchy and transferred.
- Ensure storage and handling of liquids and substances in line with requirements.
- Store construction waste in assigned areas.
- Ensure sites and work areas are always tidy and litter-free.
- Ensure spill kits and absorbent mats are available on all sites and in vans.
- Report any waste management and environmental-related incidents.

3.5. Sub-contractors

- Take training on waste management, read and sign off on all waste management-related procedures and Toolbox talks for awareness as per Viberoptix requirements.
- Ensure that waste generated during installations is appropriately handled, segregated following the waste hierarchy and transferred.
- Store construction waste in assigned areas.
- Ensure spill kits and absorbent mats are available on all sites and in vans.
- Ensure storage and handling of liquids and substances in line with requirements.
- Provide copies of waste management/carrier licences and appropriate certification of Duty of Care.
- Report any waste management and environmental-related incidents to supervisors and managers.

3.6. Procurement Team

- Procure all construction materials sustainably.
- Ensure that all new waste carriers contactors are onboarded following the ESG provided onboarding questionnaire.

4. WASTE HIERARCHY AND MINIMISATION

The waste statistics released by the Department for Environmental Food and Rural Affairs (DEFRA) show that the UK faces major challenges in sustainable waste management. The UK generated approximately 222.9 million tonnes of waste from households, construction, and commercial/industrial activities. Approximately 60% of waste produced is from the construction, demolition and excavation sectors, with 50% of all materials used in the UK being in construction.. Given these statistics, the minimisation of waste and the increased use of recycled materials therefore form an intrinsic key to resource protection. The Waste Regulations 2011 include the Waste Hierarchy, which is a framework for sustainable waste management setting out the preferential treatment of waste, as Figure 1 below shows.

Figure 1. Waste Circularity

The Waste Hierarchy principles must be implemented during the construction of the fibre network infrastructure. In installations, waste will be, as far as possible, prevented or reduced at source. Where waste cannot be prevented, waste materials should be reused directly in situ and properly segregated for recycling. If waste cannot be prevented, reused or recovered, it will be disposed of in a controlled manner at a licensed waste carriers contractor's facility.

The build crews, design teams, contractors, and suppliers are encouraged to minimise the amount of waste during design, construction and construction materials delivery.

4.1. Excavation

Specifications and measurements provided for specific build projects must be adhered to in order to minimise arisings.

4.2. Soils/aggregates/concrete

Clean soils and all aggregates or concrete that pass the Clegg test must be reused for backfilling.

4.3. Ropes and ducting

As best practice all ropes and ducting to be tied, bundled and segregated appropriately to assist with repurposing and recycling.

4.4. Wood waste

All wooden pallets and reels must be recycled and repurposed, or reused for different purposes within Viberoptix. Wooden poles coated with creosote should be treated as a hazardous waste if being disposed of, and therefore should be managed through the process described in PRO_EN_001- Pole Handling and Storage.

4.5. Construction materials packaging

Material Packaging should be properly segregated for recycling in stores. Suppliers are encouraged to minimise waste on delivery packaging.

Table 2 below summarised the Waste Hierarchy principles to be applied for all the waste generated, including packaging. This is considered an overview of typical wastes generated by the operation, but in the instance of other wastes beyond such waste types being generated, will be managed in line with the waste hierarchy as suitably practicable.

Table 2. Principles of Waste Hierarchy to be followed

Waste type	EWC code	Reused		Recycle		
		Use on situ (backfill)	off site	For use on site	For use off site	Send for recycling or processing plant
Concrete	17-01-01					
Soil and stone mixtures	17-05-04					
Wood waste (pallets and reels)	17 02 01					
Plastic (ropes and duct tubes)	17-02-03					
Clean packaging (plastic/paper and cardboard)	15-01-01 /15-01-02					
Mixed metals	17-04-07					
Bituminous mixtures and tarmac	17-03-01*					
Fibre optics/glass	16-02-15*					
Spill kits waste	15 02 02*					

Key	
Re-use	
Recyle	
Disposal/treatment	

5. WASTE MANAGEMENT PROCEDURES

5.1. General procedure

Waste produced during all construction activities on site is subject to the 'Duty of Care' under the Waste (England and Wales) Regulations 2011 and Controlled Waste and Duty of Care Regulations (Northern Ireland) 2014. It is the joint responsibility of Viberoptix and subcontractors to ensure that waste produced onsite is disposed of in accordance with legislation. The Waste Duty of Care Code of Practice (November 2018) (England) and the Duty of Care - A Code of Practice (NI) set out practical guidance on how to meet waste duty of care requirements.

The Viberoptix management team (ESG, HSEQ and site supervisors) undertake audits to ensure compliance with duty of care requirements. A register of waste carriers, disposal sites (including transfer stations) and relevant licensing details is produced and maintained online as part of the company's environmental management system.

5.2. Specific procedures

Managers, Supervisors and Build Crews

PRO-EN-001: Pole Handling and Storage
PRO-EN-002: Waste Management and Duty of Care Procedure
PRO-EN-005: De-Watering and De-Silting Chambers

All these waste management procedures are mandatory and should always be followed by subcontractors and the build team.

5.3. Waste Storage and Removal

All construction waste is stored in assigned and labelled skips at stores (both in England and Northern Ireland). Collection of waste is ad hoc and is organised by the ESG team as per removal requirements, with documentation being stored at a relevant site and/or via a relevant management portal.

5.4. Hazardous Waste Management

Where any hazardous waste is to be handled for disposal, it must be carried out in accordance with the requirements stated in the PRO-EN-002 Waste Management and Duty of Care Procedures (Section 6). Following the Street Works UK Protocol, We conduct a site risk assessment, where we assess for hazardous waste using a litmus paper. Recorded as positive if pH is between 1 to 4 or 10 to 14. Recorded as negative if pH is between 5 to 9.

All hazardous contaminated material must be quarantined in a secure bunded area, away from other materials, prior to removal off-site to an appropriate hazardous waste facility. Spill kits, aerosols, cans and sharps waste must be placed into separate secure and sealed waste boxes provided in each van.

Where a potentially hazardous waste not mentioned in the procedures identified, the ESG team must be contacted immediately. Then, a waste management company or consultant will be contracted to determine what the substance is, the required control measures for handling it, the means of transportation and the method of disposal.

5.5. Waste Carriers

All waste generated on site must be dealt with in accordance with legal requirements. Each waste carriers' licence details should be recorded by the ESG team on Viberoptix online platform.

The transportation of waste from site must comply with the 'Duty of Care' requirements. This includes ensuring waste is transported by registered waste carriers to appropriately licensed sites for processing or disposal.

When transferring waste offsite, Viberoptix (supervisors/build managers) must ensure that for non-hazardous waste one of the following processes are implemented:

- A paper "waste transfer note" (WTN) will be completed on paper in line with the template provided by the Environment Agency. This can be found at: https://www.gov.uk/government/publications/duty-of-care-waste-transfer-note-template.
- A "season ticket" - a single waste transfer note that covers a series of non-hazardous waste transfers. The season ticket can last up to one year and be used for regular transfers of the same type of non-hazardous waste with the same carrier. A record will be kept of the collection times and the quantity of waste for each transfer.

A full accurate description of the waste will be provided within the applicable notes. This documentation shall be retained (either paper or electronic) by both parties (i.e., the waste transferor and the waste transferee) for two years for non-hazardous waste

notes and three years for hazardous waste consignment notes. Support sheets are provided to guide the fulfilment of the waste transfer notes (Annex 1).

5.6. Waste Documentation Details

All movements of waste from the site must be accompanied by documentation, as detailed above. The supervisors/build managers will check that each document contains the following:

- The name of the person receiving the waste and what they are authorised to do with that waste as a registered waste carrier can only transport waste
- Types of waste produced
- The 2007 Standard Industrial Classification (SIC) code (2003 SIC if hazardous waste)
- The six-digit European Waste Catalogue (EWC) number
- Address of the producing site and details of the waste producer
- Waste carrier's details, including Waste Carrier License (WCL) number
- Quantity of waste
- How it is contained (ie. skip, bin or drum)
- Address of the receiving site and the Environmental Permit or Exemption No. Associated with the receiving site
- The date to which the documentation applies
- If the material is hazardous, a relevant Hazardous Waste Consignment Note completed with details of the end destination (including Premises Code)

Further information on the details required can be found within the Waste Duty of Care Code of Practice (November 2018) (England) and Waste Management Duty of Care - A Code of Practice (NI).

The supervisors/build managers and waste carriers must ensure all signed waste transfer notes are sent to the ESG team for record-keeping for the statutory period detailed above. Also, supervisors/build managers ensure that the waste carrier contractors are using a suitable vehicle with adequate containment for the waste.

5.7. Disposal Sites

When obtaining quotations for waste disposal contracts, where possible, the ESG team and Procurement team should consider the implications of long-distance travel in terms of health and safety risk, commercial terms and increased emissions from vehicles. Wherever possible, contracts should be awarded as locally as possible. Through prior assessment, the Procurement team will ensure that the disposal sites accepting the wastes are appropriately licenced to accept the waste being sent there, and that the Waste Hierarchy is being followed wherever possible to ensure wastes are managed appropriately.

6. TRAINING

Viberoptix provides on-site training on appropriate waste segregation, handling, recycling, reuse, and return methods to be used by all parties at all appropriate stages of waste management. Toolbox talks will be carried out when required on waste issues and for awareness purposes. All subcontractors will be expected to deliver the

information and share it with their crews. The CMMP will also be mentioned in the site induction process.

7. MANAGEMENT, REPORTING AND REVIEW

7.1. Reporting, monitoring and auditing

Waste receptacles onsite must be monitored by the Build supervisors and the ESG team to ensure that contamination has not occurred and all waste related documentation is recorded. The waste carriers contracts should continually review, at least annually, the type of waste materials being produced and taken to their site to maximise recycling. The use of landfill will be the last option in accordance with the waste hierarchy.

The ESG team must perform monthly scheduled monitoring of environmental performance and formal compliance auditing in all construction activities. This is in tandem with waste related audit carried out weekly by the Build supervisors, ESG (Environmental Sustainability and Governance) team and site managers. Monitoring of this CMMP should be included within the inspections and reports upon in the site environmental audits, monthly and annual reports.

7.2. Waste monitoring

There are three elements of importance when it comes to monitoring our waste and sustainably managing it:

- Compliance with the Duty of Care;
- Monitoring waste production
- Monitoring waste route and destination e.g., reuse, recycling, waste to energy, landfill, etc.

The ESG team works in collaboration with the build managers, build supervisors, site managers, sub-contractors and waste carriers contractors. The build team and site managers have a responsibility to monitor and minimise waste production in their operations and ensure compliance with the duty of care. The ESG manages waste management strategies, key performance indicators and reports progress to the entire Viberoptix staffs for continual improvements and corrective actions.

7.3. Review of the CMMP

This CMMP shall be reviewed annually but can be more frequent if required during the construction of infrastructure for different projects, to ensure that targets are being achieved and that realistic solutions are provided for unplanned events or abnormal waste.

8. Bibliography

UK, government (2023) ENV23 - UK statistics on waste. Available at: ENV23 - UK statistics on waste - GOV.UK (www.gov.uk)

UK, government (2023) UK statistics on waste. Available at: UK statistics on waste - GOV.UK (www.gov.uk)

UK, government (2021) Duty of care waste transfer note form. Available at: Duty of care waste transfer note form - GOV.UK (www.gov.uk)

UK, government (2020) Circular Economy Package policy statement. Available at: Circular Economy Package policy statement - GOV.UK (www.gov.uk)

9. Annex

9.1. Annex 1 – Waste Transfer Note Support Documents

Cover Sheet

DUTY OF CARE: WASTE TRANSFER NOTE COVER SHEET

COMPANY NAME:

Viberoptix OPCO LTD

COMPANY ADDRESSES:

- **Viberoptix HQ:** 76 Ballynakilly Road, Coalisland, Dungannon, County Tyrone, Northern Ireland, BT71 6HD
- **Viberoptix Stores (Northern Ireland):** 17a Farlough Road, Coalisland, Dungannon, County Tyrone, Northern Ireland, BT71 4DT
- **Viberoptix GB:** Newton Rigg College, Newton Road, Penrith, Cumbria, England, CA11 0AH
- **Viberoptix Maryport Site:** The Old Workshop, Glasson Industrial Estate, Maryport, Cumbria, CA15 8NT

Key Information:

- **SIC code:** 42220
- **Viberoptix (NI) Waster Carrier Registration Number:** ROC UT 8689
- **Viberoptix (England, GB) Waste Carriers Licence:** CBDU444851
- **Farlough Road (NI Stores) Waste Exemption:** WMEX 37/130
- **Newton Rigg College (GB Stores) Waste Exemption:** WEX373509
- **Maryport Site Waste Exemption:** WEX378378

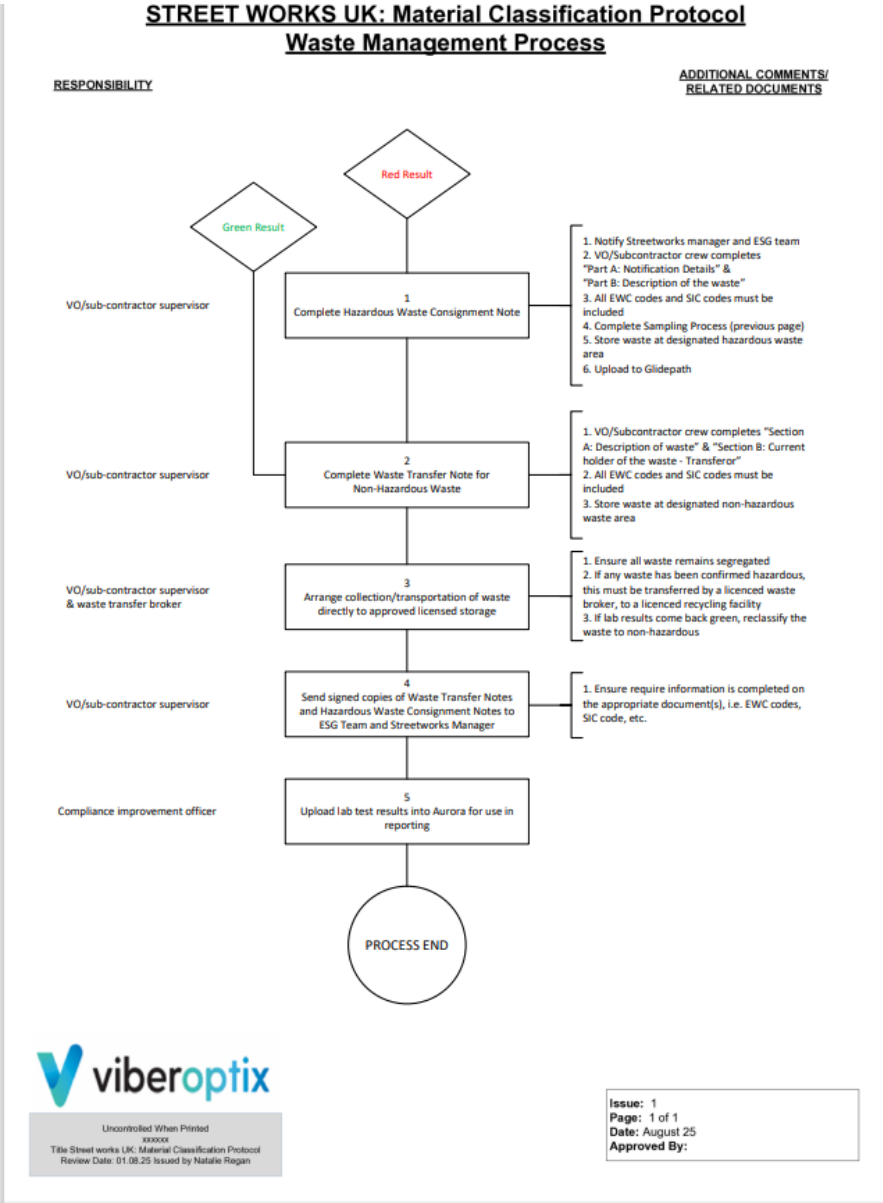
Common EWC Codes:

Waste type	Status	EWC CODE
Concrete	Non-hazardous	17-01-01
Soil and stone mixtures	Non-hazardous	17-05-04
Wood waste (pallets and reels)	Non-hazardous	17 02 01
Plastic (ropes and duct tubes)	Non-hazardous	17-02-03
Clean packaging (plastic/paper and cardboard)	Non-hazardous	15-01-01 /15-01-02
Mixed metals	Non-hazardous	17-04-07
Waste water	Non-hazardous	13-05-01
Bituminous mixtures and tarmac	Hazardous	17-03-01*
Fibre optics/glass	Hazardous	16-02-15*
Spill kits waste	Hazardous	15 02 02*

Support Sheet

10. Annex

10.1. Annex 1 – SWUK Protocol Support Documents



Support Document