



Environment, Health and Safety Review for the year to 31st December 2024

Prepared by Mick Schilling CMIOSH
Environment, Health and Safety Advisor

The Coventry and Solihull Waste Disposal Company Ltd
Bar Road,
Coventry
CV3 4AN

Contents

	Page
1. INTRODUCTION	2
2. MANAGEMENT SUMMARY	2
3. HEALTH & SAFETY PERFORMANCE	4
3.1 Injuries	4
3.2 Incidents & Near Misses	7
3.3 Other Health & Safety Issues	8
3.4 Employer's Liability & Public Liability Insurance Claims	8
3.5 Workplace Inspections	8
4. ENVIRONMENTAL PERFORMANCE	8
4.1 Environmental Complaints/Incidents	8
4.2 Other Environmental Issues	9
4.3 Unauthorised Releases	12
4.4 Other Release Notifications	12
4.5 Environmental Performance – Releases to Air	13
4.6 Environmental Performance – KPIs	13
5. CONTACTS WITH REGULATORY & OTHER BODIES	14
5.1 Health & Safety Executive	14
5.2 Environment Agency	14
5.3 EH&S Management System Audits	14
5.4 Other Visits & Contacts	15
6. ENVIRONMENT HEALTH & SAFETY IMPROVEMENT PROGRAMME	15
6.1 Environment, Health and Safety Objectives and Targets	15
6.2 Changes to Environmental or Health and Safety Legislation, Other Requirements, Risks, Opportunities, and the Needs of Interested Parties	15
APPENDICES	
Appendix 1 Injury Statistics	16
Appendix 2 Incident summary	18
Appendix 3 Environmental Performance	20
Appendix 4 Emission Performance	21
Appendix 5 Improvement Plan 2024	24
Appendix 6 Objectives, Targets and Improvements 2024	25
Glossary	27

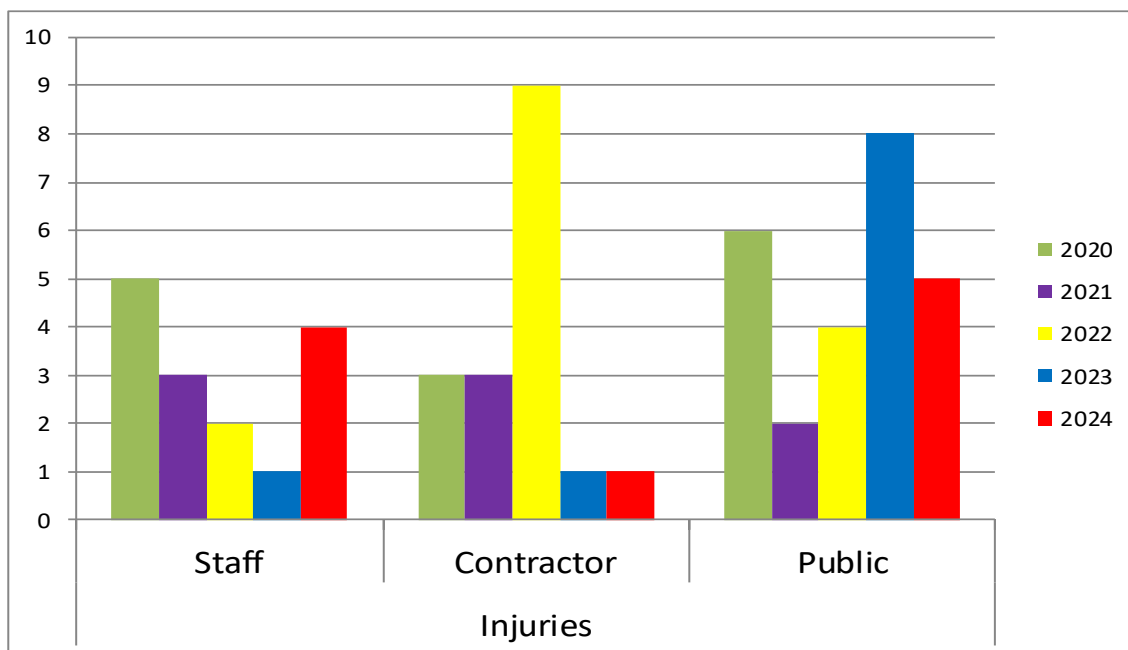
1. Introduction

This report provides a review of Environment, Health and Safety for CSWDC from 1st January to 31st December 2024 inclusive and addresses four principal areas;

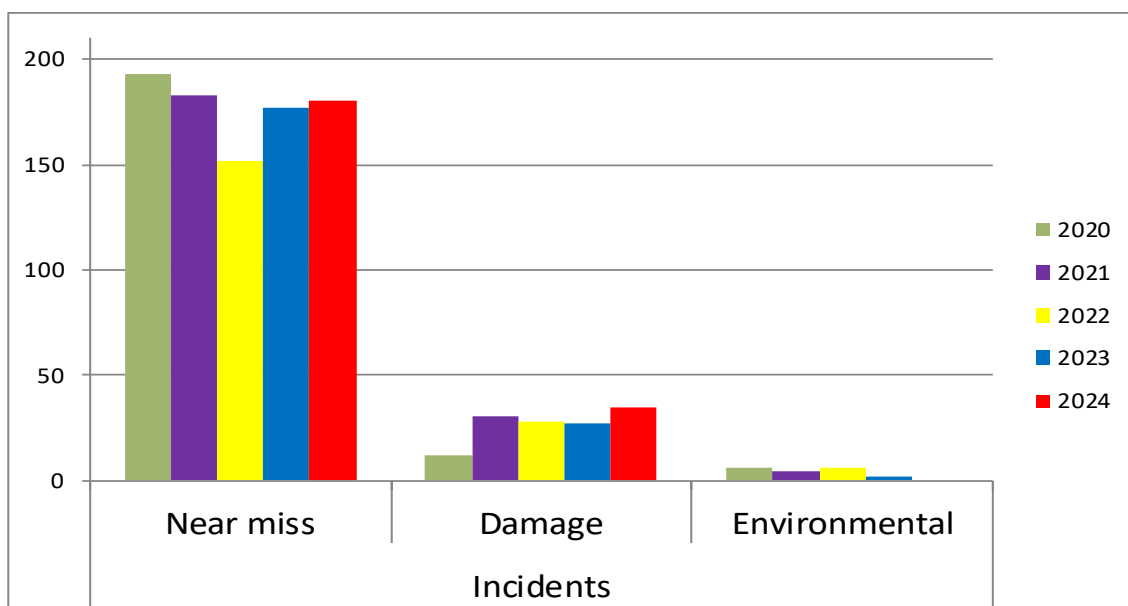
- Health & Safety Performance
- Environmental Performance
- Contacts with Regulatory and Other Bodies
- The Environment Health and Safety Improvement Programme

2. Management Summary

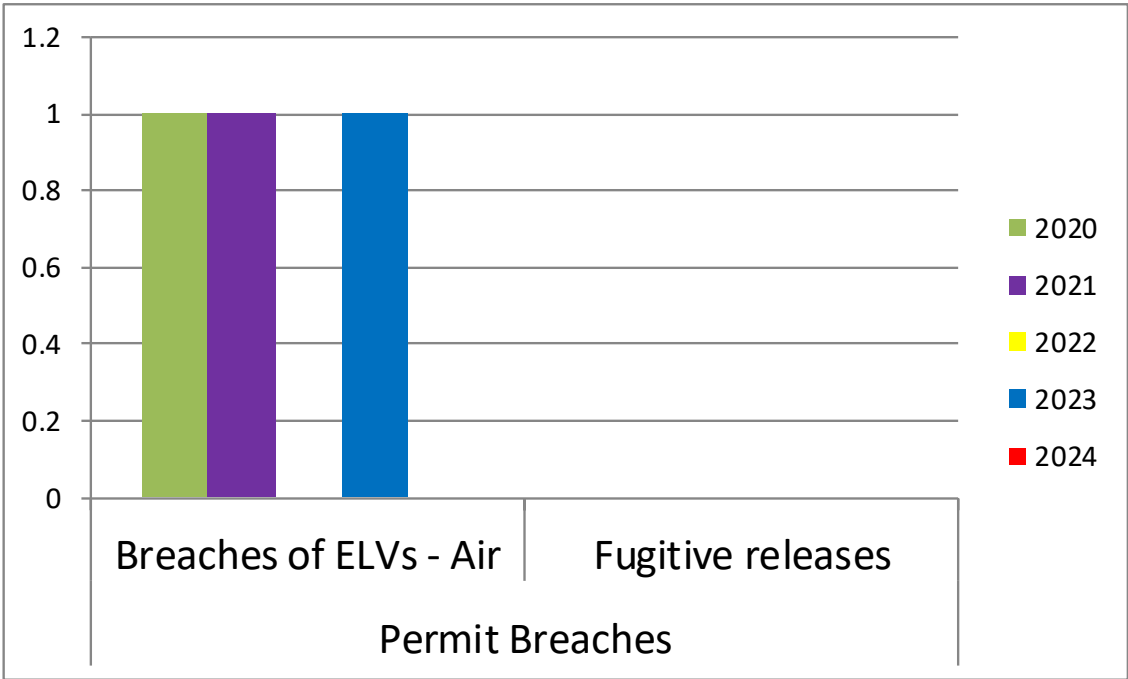
Injuries to Persons



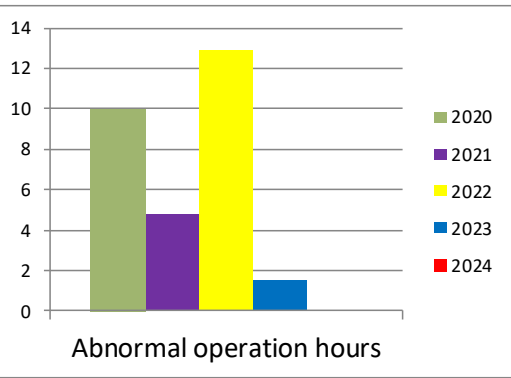
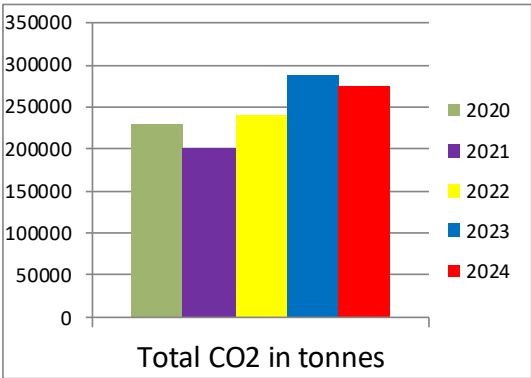
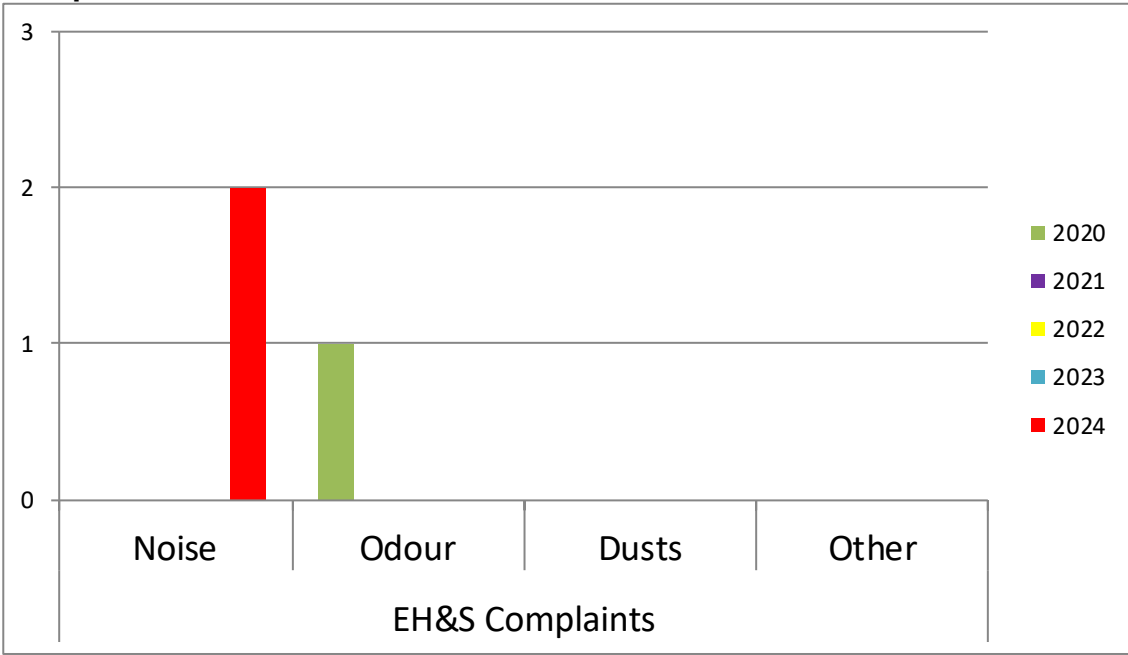
Incidents, Hazards and Near misses



Environmental Performance



Complaints



3. Health and Safety Performance

3.1 Injuries

During 2024 there were 11 injuries reported under the incident reporting procedure. 5 accidents involved employees, one accident involved contractors, and 5 involved members of the public on the HWRC.

Of these, one (1) staff injury required reporting under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

All 11 injuries are detailed below, with the * **RIDDOR event marked ***:

Month of Injury	Group of Person	Location	Description
January	Public	HWRC	After disposing of waste in various bays a MoP noticed a small cut on right hand when they reached the plasterboard container.
February*	Staff	Tipping Hall	Injured Person was disposing of waste into the bunker, when a grab of waste was released causing the waste to hit the telehandler bucket and boom lifting the machine off the ground. *RIDDOR due to lost time >7 days
February	Staff	HWRC	Injured Person was bitten by a security dog causing a red mark on upper right leg.
March	Staff	Furnace Hall	Injured Person slipped using short stair and their temple hit a G cramp in their toolset causing a small cut to the right eye socket near the temple.
April	Staff	First Aid Room	Injured Person was undergoing a spirometry test when they fainted causing them to bump their left eye socket causing a bruise.
June	Contractor	Furnace Hall	Injured Person was grit blasting when they sustained an abrasion to their upper arm.
July	Public	HWRC	MoP lifted a bath tub over their head to throw it into the skip. As they did so, the back of the bath stuck them on the back of the head causing a small cut.
August	Public	HWRC	MoP cut their left forearm whilst disposing of a microwave into the skip.
August	Public	HWRC	MoP was disposing waste into a bay when they tripped over their own waste causing them to graze their leg.
September	Employee	Hot Well	Injured Person tripped on a scaffold pole which was on the floor causing them to twist their ankle.
November	Public	HWRC	MoP was walking with a builders bucket full of waste when they slipped over.

All the accidents recorded have been actioned under the incident report system with new or additional controls measures put in place, such as toolbox talks, changes in procedures or risk assessments and improvements to safe systems of work. Specific actions were implemented where possible to further reduce risk. Reviews of risk assessments and safe working procedures continue in all areas to ensure these documents remain relevant for the tasks to which they relate.

This quantitative result is that there were a similar number of injuries when compared to 2023 performance.

The injury rate per 100,000 hours worked for staff and contractors has increased from 1.23 injuries per 100k hours worked to 2.59.

Whilst the injury rate for staff and contractors per 100,000 hours worked has doubled, it is worth noting that only 3 of the 5 staff injuries were directly related to work (others being a dog bite and a faint during a medical exam). Contractor injuries remain low with only one being reported, which is the same as 2023.

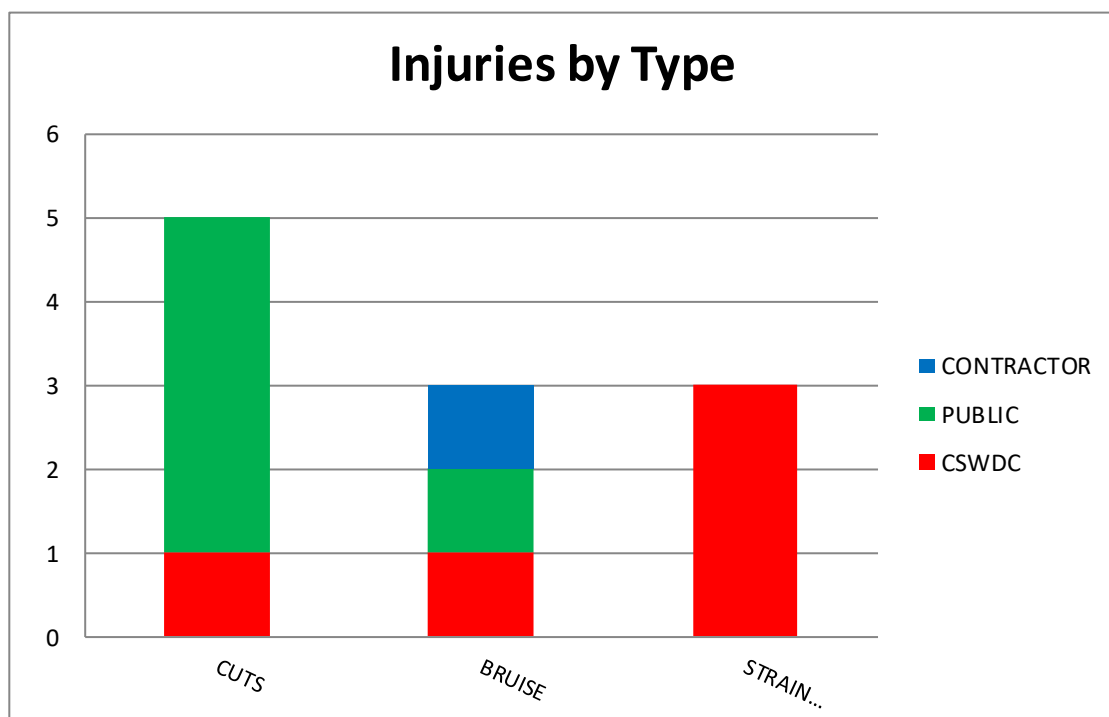
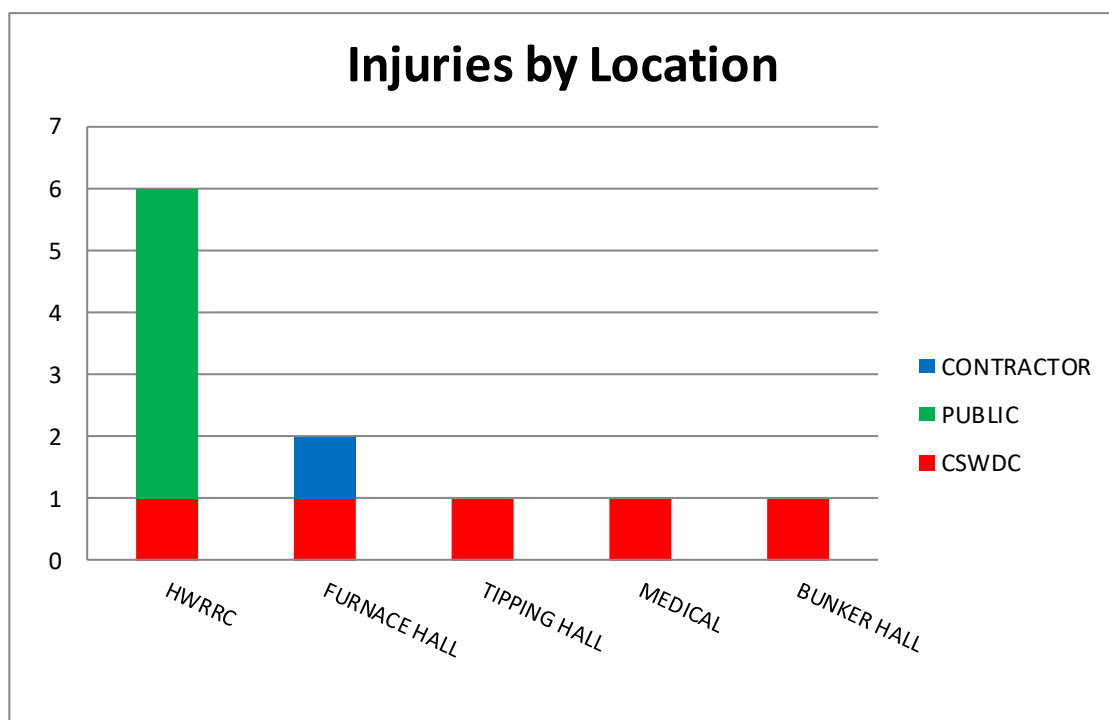
Public injuries have decreased from 8 in 2023 to 5 in 2024.

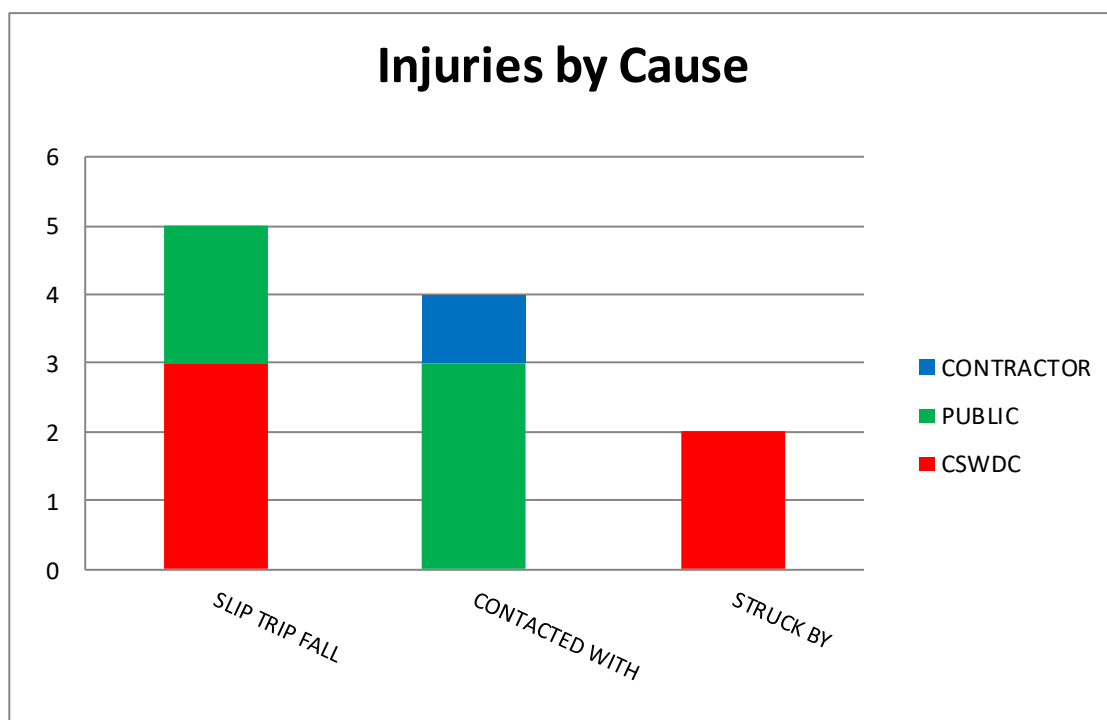
The public can behave in an unpredictable manner but given the number of people who use the HWRC over the course of a year these figures do not give cause for undue concern, as shown by the incident trend over the last 10+ years in APPENDIX 1. The levels continue to be monitored and suitable actions are taken where possible. All public injuries in the year were sustained whilst handling their own waste materials and although staff offer advice and assistance where possible, not all members of the public are prone to heeding advice or accepting help.

Follow-up and closure of injury reports is ensured by the intranet workflow system and monthly meetings to go through any items that remain in progress.

Injuries by Person Type

	Staff	Contractor	Public
2019	5	5	3
2020	5	3	6
2021	3	3	2
2022	2	9	4
2023	2	1	8
2024	5	1	5





Most of the injuries are attributable to unsafe behaviour; where someone's acts or omissions have contributed to the injury. Incident trends are discussed with the senior management team and individual events are included where relevant, to ensure lessons are learned and actions taken are appropriate. The behavioural conversations that are conducted each month also help to direct people's attention onto the consequences of their actions, and reduce unsafe acts.

Toolbox talks and H&S videos continue to be undertaken in all departments to improve and maintain awareness. These have been targeted where relevant to increase focus on a specific area of risk or type of hazard. The video system is available on any internet-connected device using individual accounts. Participation is monitored and reported to the senior management team at the monthly management meetings and the quarterly EH&S Committee meetings. Monthly team briefings also include targeted information where relevant if there is a current subject that needs discussion.

Contractor information is stored in a database enabling easy checks on insurance and the standards of risk assessments. Automated email reminders are issued to nominated supervisors to ensure insurance information is renewed in a timely manner.

3.2 Incidents and Near Misses

There were 180 hazards/near misses reported during 2024, which again exceeds the target set at the start of the year (12 each month). The reporting of hazards and near misses is encouraged as it allows us to identify and address a risk before an accident has taken place.

All incidents are reported via the SharePoint intranet system, which enables immediate notification and tracks the status of corrective actions. Close-out of the reports is monitored and reported to senior management on a monthly basis; any open actions are discussed at a quarterly meeting with the Directors and senior managers, to completion of open actions. Reports include abusive customers at the HWRC.

Damage incidents have increased from 27 in 2023 to 35 in 2024. This remains disappointing, as historical incident levels were much lower. The spread of the causes in damage incidents is as follows – Delivery Vehicles 11, Employees (mobile equipment operation) 8, MoP 5, Plant or equipment issues 3, Contractors 8. The increases this year have been most noticeable in staff and contractor groups.

Reporting levels remain strong, with even minor events being recorded. Plant and equipment damage incidents also continue to be captured more consistently.

Note – explosion damage from N₂O cylinders in the combustion chamber are not included here.

The incident reporting levels from other areas such as operations and engineering remain encouraging, with reports being raised where relevant. APPENDIX 2 contains a summary chart and trends of the incidents and near misses that have occurred during 2024.

3.3 Other Health and Safety Issues

Quarterly EH&S committee meetings continue to be well attended and productive, with each senior manager presenting on health and safety activities within their teams. Involvement is positive and senior management are actively engaged in providing a monthly summary of activities whilst also encouraging the team members on the committee. The HR Business Partner joined the committee upon their commencement in January 2024.

3.4 Employer Liability & Public Liability Insurance Claims

One new insurance claim was raised in 2024, which related to the RIDDOR back injury in February 2024.

There has been no further communication regarding the finger injury claim received in 2023.

3.5 Workplace Inspections

Monthly, internally-driven workplace inspections continue to be performed by management, supervisors and employee representatives on the EH&S committee. A total of 178 activities took place in the year, which includes inspections, audits and behavioural conversations. This is an improvement of 10 when compared to 2023. The maximum possible is 192, which shows an approximate increase in activities of 5% compared to 2023.

4. Environmental Performance

4.1 Environmental Complaints/Incidents

There were two complaints received in 2024 which related to our EH&S performance, both relating to noise.

The first related to increased noise from a new filter system on the APCr silos that was creating noticeable noise increases. Effective controls were implemented which our neighbours confirmed had been effective in reducing the noise.

The second related to shrubbery trimming that was completed unannounced one summer evening using a large tractor and rotating blades. This will only be undertaken in future after notifying neighbours of the work to reduce any alarm caused.

4.2 Other Environmental Matters

BREF Derogation and Local Enforcement Position (LEP)

LEP was only granted for 6 months and although CSWDC requested an extension the Environment Agency (EA) have stated it's not required as we are currently compliant.

The requirements of the WI BREF were implemented into the Environmental Operating Permit for the Facility in a Variation granted by the EA on 5 October 2022, but compliance with the requirements of the WI BREF did not apply until 3 December 2023.

In 2016/2017, when the draft WI BREF was first published, CSWDC carried out successful trials which demonstrated that the Facility was able to demonstrate a level of compliance with the BATAELs for NO_x and NH₃ across all three lines. However, from early 2022, each line experienced anomalies in operating to the relevant BAT-AELs.

In early 2022, CSWDC identified an issue with the emissions of NO_x and NH₃. The main issue appeared to be the reaction time for NH₃ and NO_x which meant that when the Facility was operated to the BAT-AEL for NO_x, NH₃ would exceed the BAT-AEL.

CSWDC commissioned a NO_x combustion specialist (RJM) to undertake a root cause analysis to identify any deficiencies in the NO_x abatement systems. RJM identified that there was an underlying problem with NO_x and NH₃ appeared to be how the combustion was taking place and the performance of the over fire air (OFA) system.

CSWDC undertook modifications to the OFA system across all three lines between July and November 2023 to address this issue.

Whilst the initial monitoring results appear to show that the modifications to the system enable all three lines to operate in accordance with the BAT-AELs, due to the previous issues experienced by CSWDC, it is undertaking further investigations for additional improvement to ensure long-term compliance.

CSWDC has identified and will consider the following possible technical solutions to provide additional abatement for emissions of NO_x and NH₃, as follows:

- Undertake further optimisation of the SNCR and combustion system by installing improved temperature roof measurement, ammonia injection and optimisation with Martin;
- Installation and commission an FGR system; or Combustion optimisation with Martin GMBH - this will involve changes to the boiler.

All of these options can only be undertaken during a period of extended shutdown, and it is not feasible to implement the improvement across all three lines at the same time.

Therefore, whichever of the measures are adopted it would take a minimum of four years for them to be implemented across all three lines.

CSWDC understands that the timeline for installation of the FGR system would be the longest of the options available, allowing for the procurement process, design and installation of the FGR systems (and associated enabling works).

Continuous Emission Monitoring System (CEMs) 2024

Compliance Testing

6 monthly compliance testing (isokinetic) was completed and both sets of results for 2024 were compliant

QAL 2 / AST 2024

- Line 1 will be retested Jan-25 as a leak and fault was found on the FTIR which meant the QAL 2's were poor. Organised for 20/01/25 – 22/01/25.
- Line 2 and 3 duty OK. Inputting functions 13/01/25
- Line 2 and 3 standby desk top review was carried which yielded an improved QAL2 functions. Which has been inputted.
- Line 3 SO₂ for both duty and standby failed so repeated with ELV of 50. Which passed submitted approach to EA still awaiting a response.

Coventry 'Heatline' Project

ENVEA have now rebranded to BRING energy and they are actively engaged at looking to expand the heat network. BRING are currently in discussions with Coventry University regarding supplying heating to their buildings. The efficiency of the EFW plant would increase significantly if this was successful.

BREF - Improvement Conditions

Improvement Condition 1 (IC1) – this has been extended by the Environment Agency (EA) to 30/05/25 – it is an IC on NO_x improvement and requires further time.

OTNOC (other than normal operating conditions) Plan.

Given that the final documents have been delayed, the EA now plan to instead start auditing OTNOC Management plans (including start-up and shut-down definitions) from May 2025 onwards.

The EA are not asking operators to formally submit their plans to them for review, but the local site officer will ask the operator to send them a copy ahead of carrying out the audit. CSWDC have a plan and it's in the process of being finalising ready for audit.

Streamlined Energy and Carbon Reporting (SECR) FY24-25

Streamlined Energy and Carbon Reporting (SECR) – 6 monthly data collation (April – Sept 24) has been completed and submitted to Ramboll for processing. To note this is CSWDC's 3rd year reporting this data. CSWDC meets the SECR qualification requirements. As part of that requirement, CSWDC must include a section of the Director's Report, which complies with the 2018 Regulations within their submission.

Incinerator Bottom Ash (IBA)

The EA carried out a full audit of the IBA sampling and analysis 10/12/25. This is a country wide national campaign. CSWDC haven't received the CAR to date however nothing was flagged at the time of the audit.

Classification of Copper Particles - IBA

The Environment Agency in 2024 have engaged with industry following a new approach to the classification of copper particles mandated by HSE. CSWDC have applied the approach that individual copper compounds are assessed individually (Zinc approach). The EA may however, take the same approach as Lead and therefore deem total copper to be the assessment criteria, in which case a third of the samples would be hazardous under the H14 category. The EA are still deciding its approach.

Emissions Trading Scheme (ETS)

The Government consultation on the inclusion of energy from waste within the UK Emissions Trading Scheme (ETS) is closed but there remains a huge amount of detail to be developed in the next 17 months before facilities must start reporting under the scheme. CSWDC have responded via Ramboll, ESA and CSWDC shareholders are also in discussions with the government regarding ETS.

Borehole Application Update

The EA have issued a new borehole abstraction permit to site. The annual authorised quantity will be reduced to **424,614 cubic metres** which was CSWDC maximum actual abstraction during the last ten years (approximately 80% of the previous authorised quantity). This prevents large amounts of mains (Towns) water being used on site and the associated higher costs. A lot of hard work was put into this application to prove to the EA that CSWDC were not impacting the aquifers and water levels in the area. This is a great result for the business and the Environment.

Fichtner - Climate change resilience

The EA issued a CCA questionnaire last year which CSWDC did not receive. CSWDC's site inspector followed up at a visit, sent over a new copy (March-24) and CSWDC completed it. As a result of the questionnaire CSWDC engaged Fichtner to carry out a GAP analysis and Risk Assessment. Further work will extend into 2025.

Environment Agency - HWRC Unannounced Site Inspection 01/07/24

The total non-compliance score for the inspection was 0 CCS points which makes CSWDC a band A operator and means that CSWDC HWRC subsistence fees for next year will be 95% of the baseline subsistence charge. Excellent result to an unannounced audit due to the HWRC team's professionalism on that day.

Waste Upholstered Domestic Seating Incineration

The EA confirmed that Regulatory Position Statement (RPS) 266, on Segregating waste upholstered domestic seating that may contain POPs at HWRCs, expired on the 1st December 2024 and has been withdrawn. CSWDC's EFW no longer accepts WUD's onsite.

CSWDC only had two sources of WUDs onto site:

- Solihull Metropolitan Borough Council (SMBC) HWRC waste, which is now disposed of via Veolia Tyseley in Birmingham.
- Coventry City Council (CCC) HWRC which is disposed of via Tom White Waste to Premier Waste (UK) Holdings Plc, 209-211 Walsall Road, Perry Barr, Birmingham, West Midlands, B42 1TY.

As a reminder CSWDC have requested that all EFW customers confirm via email that their waste does not contain WUDs. The EA have confirmed they are satisfied with CSWDC response.

Fichtner – Waste Management Policy Review

Fichtner have carried out a review of proposed changes to UK waste management policy in terms of waste arising and the associated carbon emissions for the waste received and processed by the Coventry Waste to Energy facility.

Waste management policies/strategies to be considered in the study:

- Implementation of separate collections for food waste;
- Implementation of a Plastic Tax;
- Implementation of the Extended Producer Responsibility for packaging waste; and
- The UK wide strategy to reduce residual waste arisings by 50% by 2042.

4.3 Unauthorised Releases

There were no unauthorised releases or breaches of the CSWDC operating permit in 2024.

Unauthorised Release Historical Data

Year	Yearly Total
2024	0
2023	1
2022	0
2021	1
2020	1
2019	2
2018	3
2017	1
2016	0
2015	1

4.4 Other Release Notifications

Abnormal Operation

The table below shows the duration of Abnormal Operation events reported to the Environment Agency.

Year	Line 1	Line 2	Line 3	Total hours
	60hr limit	60hr limit	60hr limit	180 hrs
2024	0	0	0	0
2023	0	1.5	0	1.5
2022	8.33	0	4.5	12.83
2021	1.5	1.65	1.5	4.73
2020	0	0	0	0
2019	4.85	8.68	6.05	19.58
2018	6.25	3.52	5.46	15.23

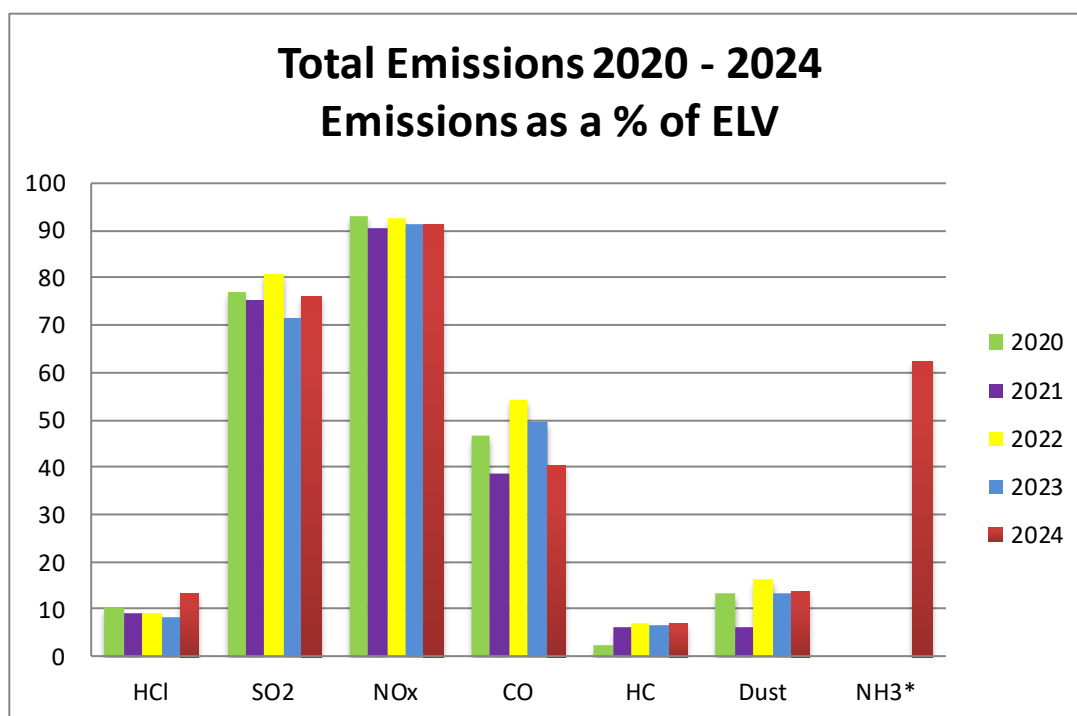
Permit conditions allow 60 hours of abnormal operation on each unit each year.

Fugitive Emissions

These are any gas, liquid, solid, mist, dust, or other material that escapes from a process or equipment other than the chimney stack and passes beyond the site boundary.

There were no instances of fugitive releases of pollutants from site in 2024.

4.5 Environmental Performance – Releases to Air



*NH3 in the above chart was re-applied as a daily average ELV December 2023

All emissions are well within the ELVs set by the Environment Agency in our Environmental Permit, as shown in the chart above as a percentage of the Emission Limit Value. All values remain steady. NO_x emissions are controlled by a system which balances the emission level with the amount of ammonia that is injected. A similar system is in operation on the acid gas sorbent dosing systems. Both these systems are designed to keep emission levels within limits whilst ensuring the dosed chemicals are not over-dosed unnecessarily (ammonia and hydrated lime have environmental impacts as well as costs, so control of their use is important). The ELV for NH₃ was re-introduced at the end of 2023, therefore there is only one year of data for that measure.

Further graphs showing comparisons with historical emission levels *per tonne of waste processed* can be found in Appendix 4.

External sampling and analysis contractors have carried out periodic extractive sampling of the emission gases twice during 2024.

All the results were below the Environmental Permit Emission Limit Values. Where applicable the results were comparable with the data generated by the Continuous Emissions Monitoring equipment.

4.6 Environmental Performance – Key Performance Indicators

A summary table of the Key Performance Indicators is shown in Appendix 3. These indicators are used by the EH&S Management System as a method of tracking significant inputs and outputs from the plant on an ongoing basis.

Total water usage bears little resemblance to normal due to the G1 failure.

The volume of gas consumed by the site decreased by a small margin from 3,688,083 ft³ to 2367400 ft³ most likely due to a warmer winter.

The exported electrical energy generated per tonne of waste is much less than expected due to the turbine failure with 0.062 MW/tonne generated as opposed to the more usual 0.36 MW/tonne.

The tonnages of ash residues collected remain similar to previous years; all residue 'tonne per tonne of waste processed' figures have remained similar to the previous years. Ferrous metal collection was again lower than usual at 1.7% of throughput mass. Looking back to 2022 and before, levels were consistently around 2.7%. It is believed that the on-going reduction in ferrous metal collected from the ash is due to increased recycling at the kerbside.

5. Contacts with Regulatory and Other Bodies

5.1 Health & Safety Executive

There were no visits to site nor any other formal communications received from the HSE during 2024.

5.2 Environment Agency

The sites EA enforcement officers; Teresa Walters and Gurinder Bains, visited site three times in 2024.

- 1/7/24 Teresa Walters inspected the HWRC.
- 8/7/2024 Gurinder Bain visited the EfW.
- 10/12/2024 Gurinder Bains visited the EfW

All were positive visits with no scoring being made against us.

5.3 EH&S Management System Audits

The third party auditing body carried out a surveillance audit of the Company Environmental, Health & Safety Management System (EHSMS) during July 2024. The system was certified for continued compliance to the environmental ISO14001 and the health and safety ISO45001/2018 standard. During the visit, all previous corrective action requests and observations for improvement were closed out.

Three minor nonconformities identified.

Internal audits were performed on the integrated EH&S systems on a monthly basis during 2024. One of the 12 planned audits performed during the year identified an area of nonconformity or a minor area for improvement. Corrective actions are complete or planned ready for re-auditing later during the year. Internal audits were also undertaken on work control processes, where the RAMS, work instructions and permits were checked out and audited. Permit to work audits are undertaken each month by the technical senior managers as part of the area inspection plan.

5.4 Other Visits & Contacts

During the course of 2024, there were 6 visits to site from educational bodies.

There were 2 visits to site by client groups to learn about the process.

The Company website continues to be updated, featuring emissions data and background information, process information and details of our EH&S policy and management system certification. The site induction is available via the website to enable remote access to the induction system prior to arriving to site, thus making the setting to work of contractors more efficient.

6. The Environment Health and Safety Improvement Programme

6.1 Environment, Health and Safety Objectives and Targets

EH&S target attainment was generally excellent, with the majority of targets being met. The notable exception being the RIDDOR event in February and the two noise complaints in the summer.

The minor injuries remained the same as 2023 with 10.

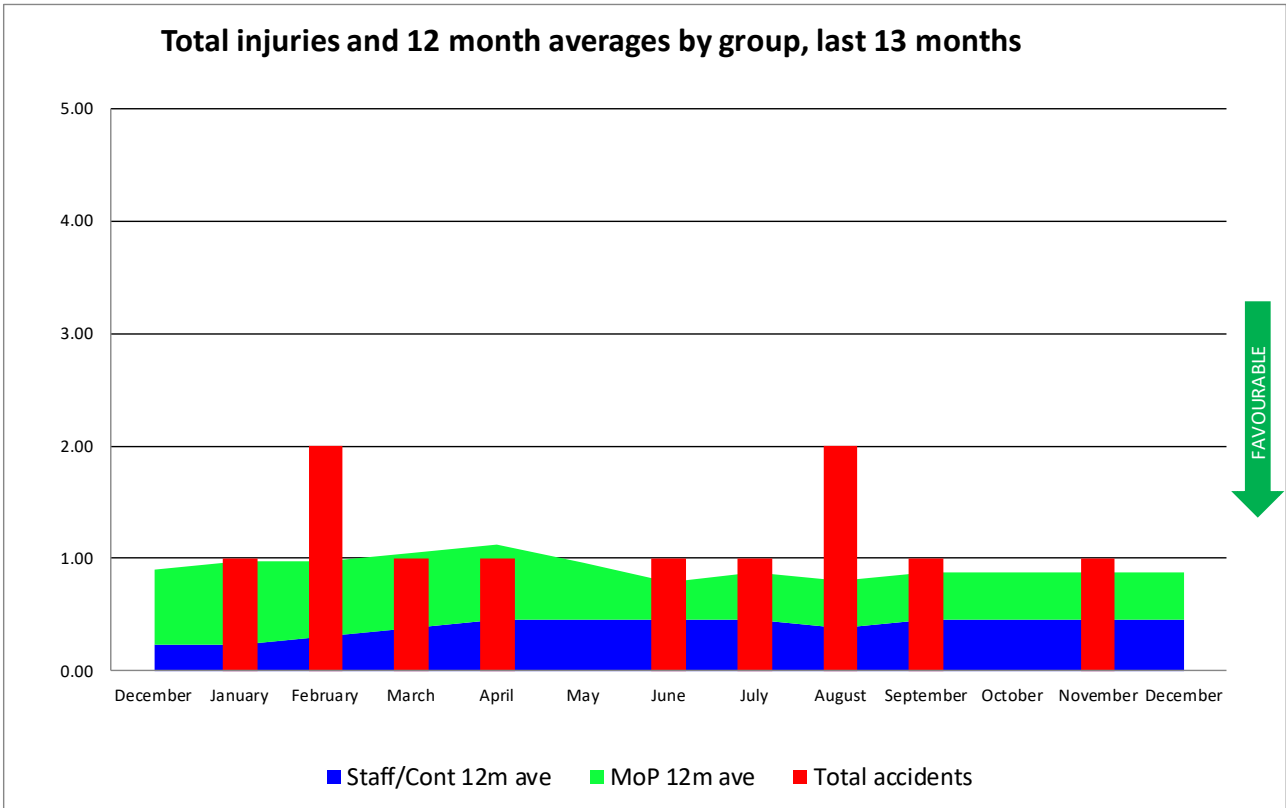
The targets for area inspections and behavioural conversations were also met.

Objectives, targets and the improvement plan for 2025 can be found in Appendix 6, with which will again seek to improve on last year's performance.

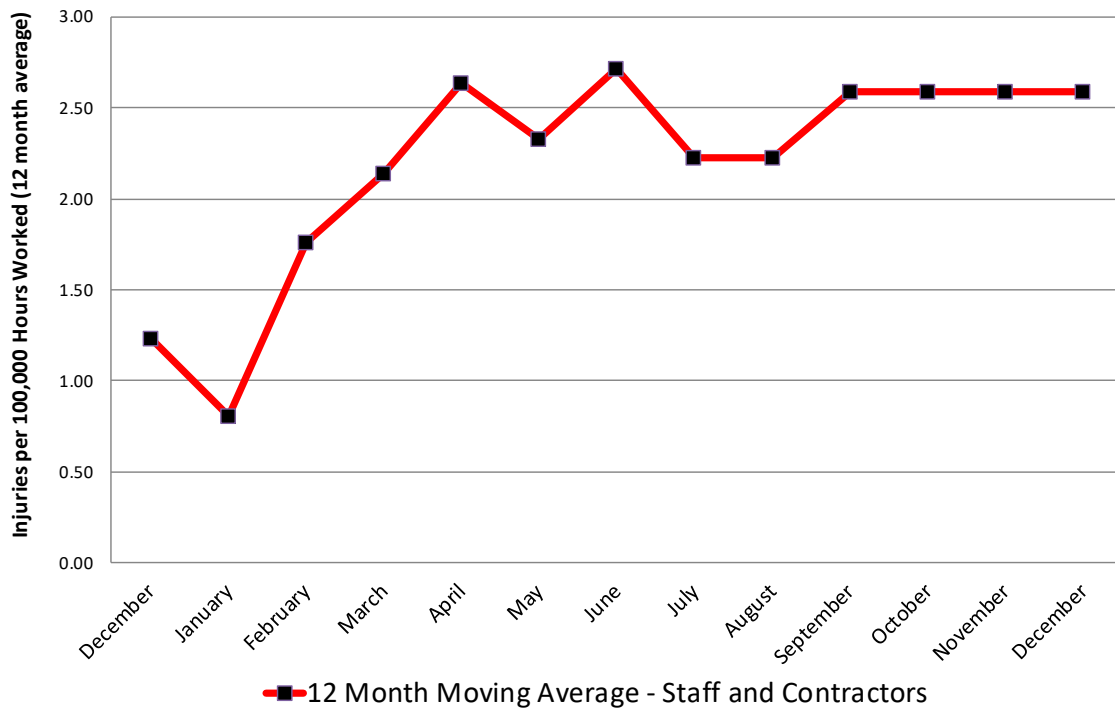
6.2 Changes to Environmental or Health and Safety Legislation, Other Requirements, Risks, Opportunities, and the Needs of Interested Parties

No applicable new or revised legislation came into force during the year.

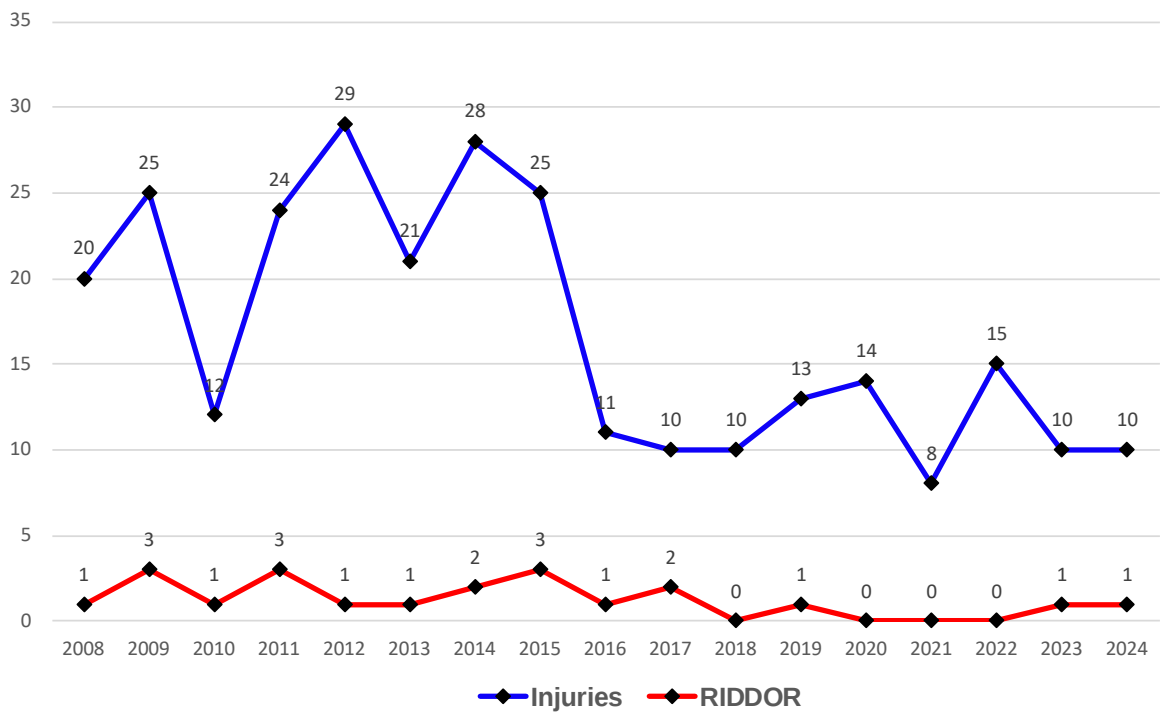
APPENDIX 1 - INJURY STATISTICS 2024



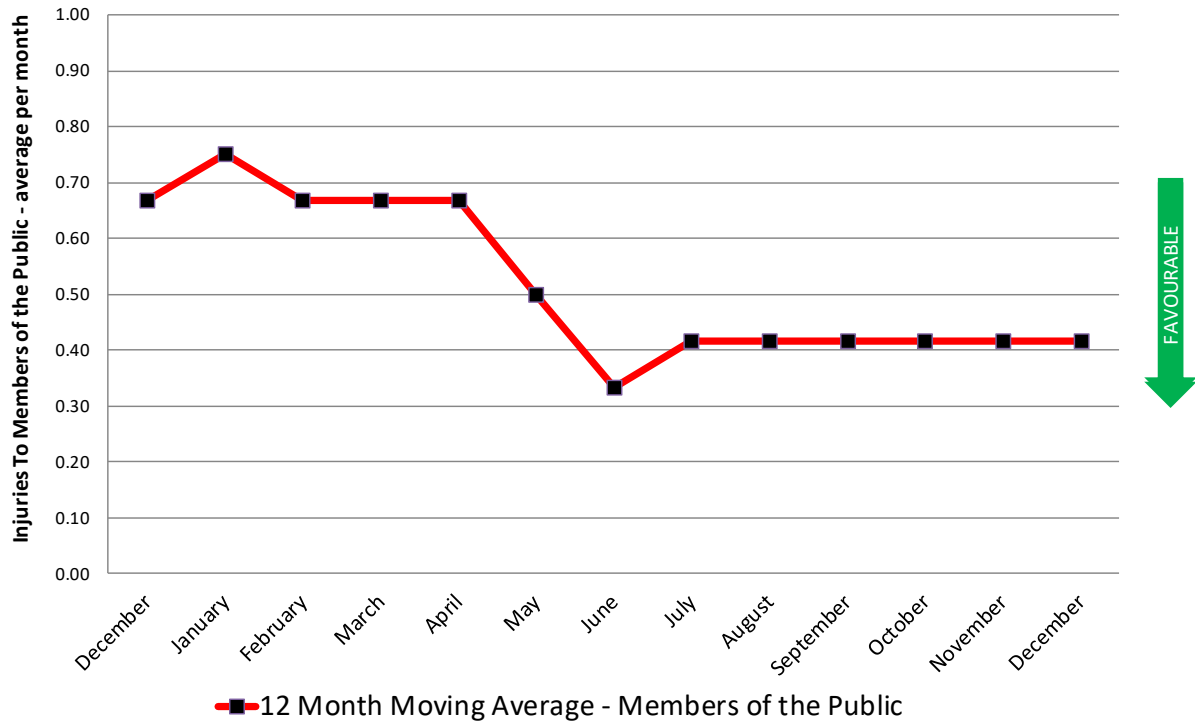
Injury Frequency Rate Trend - CSWDC Staff and Contractors *only*



Injury Trends (all injuries by year) 2008 - 2024

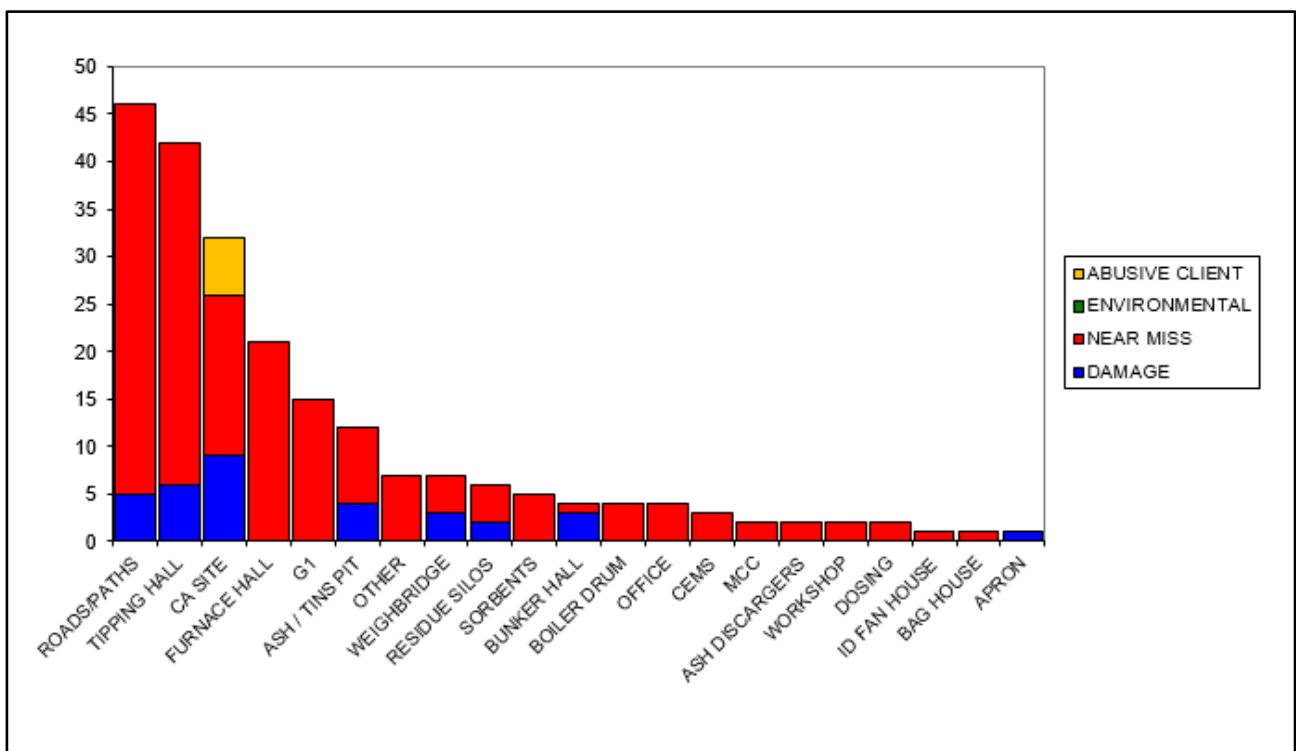


Injury Trend - Members of the Public Using the HWRC

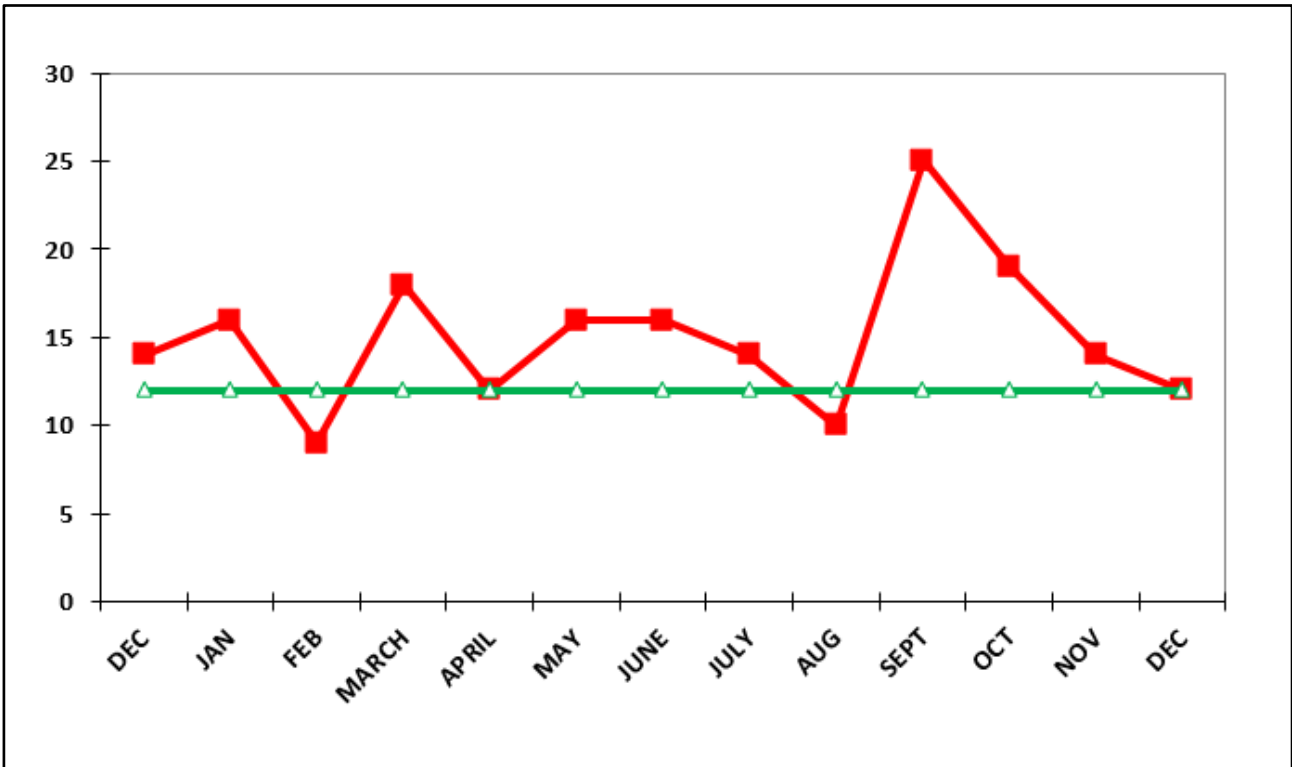


APPENDIX 2 – INCIDENT & NEAR MISS SUMMARY 2024

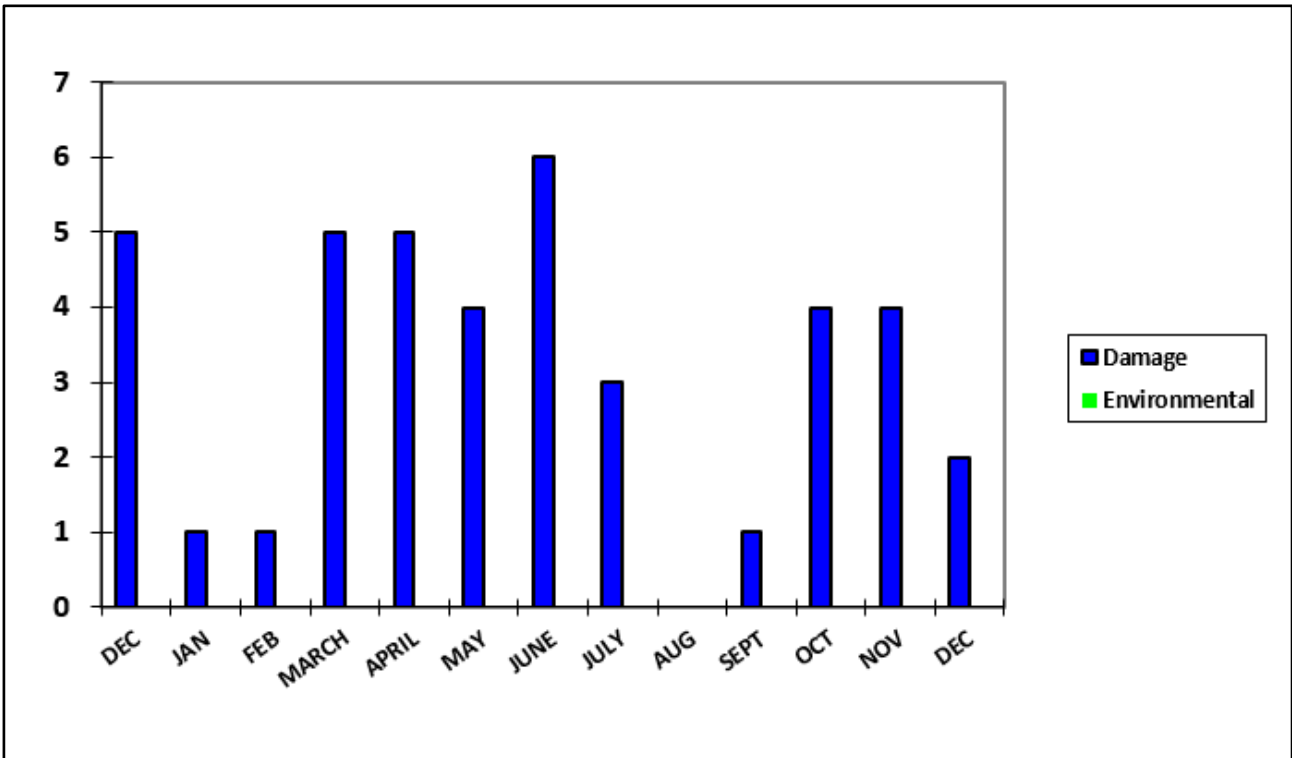
Incidents, Hazards & Near Misses by location:



Hazard and Near Miss trend 2024



Damage and Environmental incident trends 2024



APPENDIX 3 - ENVIRONMENTAL PERFORMANCE

KEY PERFORMANCE INDICATORS 2024

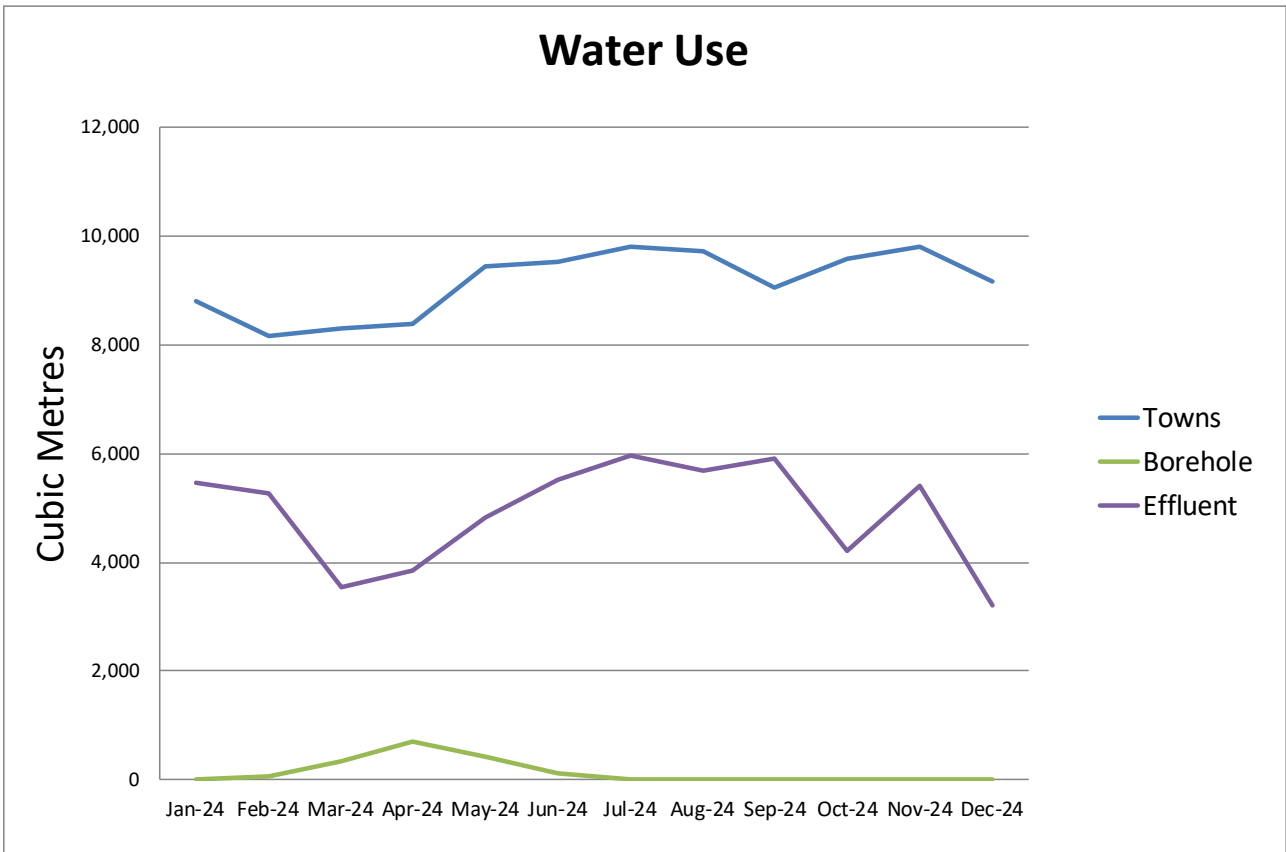
Gross resource use

	Type	2024	2023	2022	2021	2020
Waste Disposal (tonnes)	Waste Throughput	291464	291803	297821	295135	313268
	APC	12269	12311	11846	11344	12904
	Bottom Ash	44212	44623	43365	42617	47961
	Incinerated Metal	4987	5696	8035	7988	8450
Electrical Generation (MWh)	Exported	18176	54086	108267	105452	113052
Water Usage (m³)	Town's supply used	109859	84526	122128	110921	112340
	Site abstracted - river + borehole	1675	149376	323343	362165	381169
Water Discharges (m³)	Effluent to Sewer	58894	73945	105726	119165	123312
Gas Usage (ft³)	Site Consumed	2367400	3688083	3896100	3960900	2853800
Electricity Usage (MWh)	Site Consumed	20165	20843	22847	22202	23404
Steam Flows	Total Steam Flow (t)	876600	885456	897054	875108	927980
	Steam /t waste	3.01	3.03	3.01	2.96	2.96
	Steam (t)/MWh _{Export}	48.23	16.37	8.29	8.3	8.21

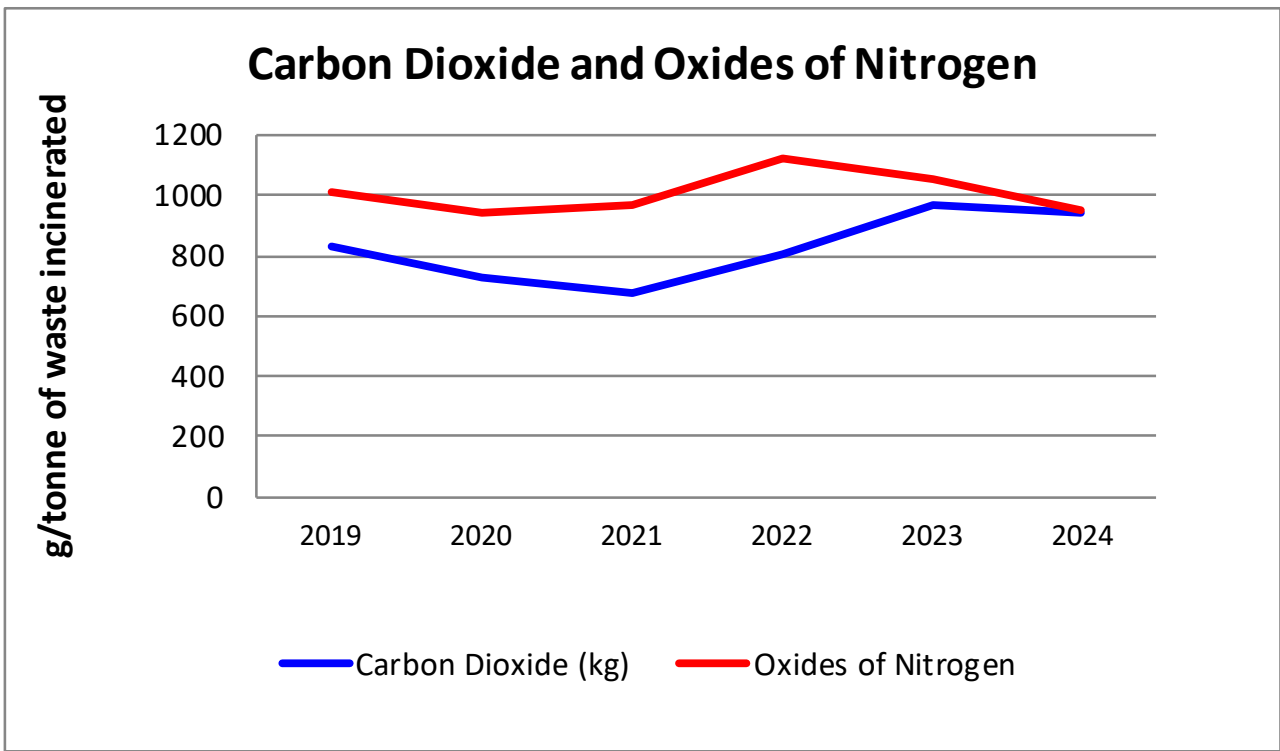
Indicators per tonne of waste processed

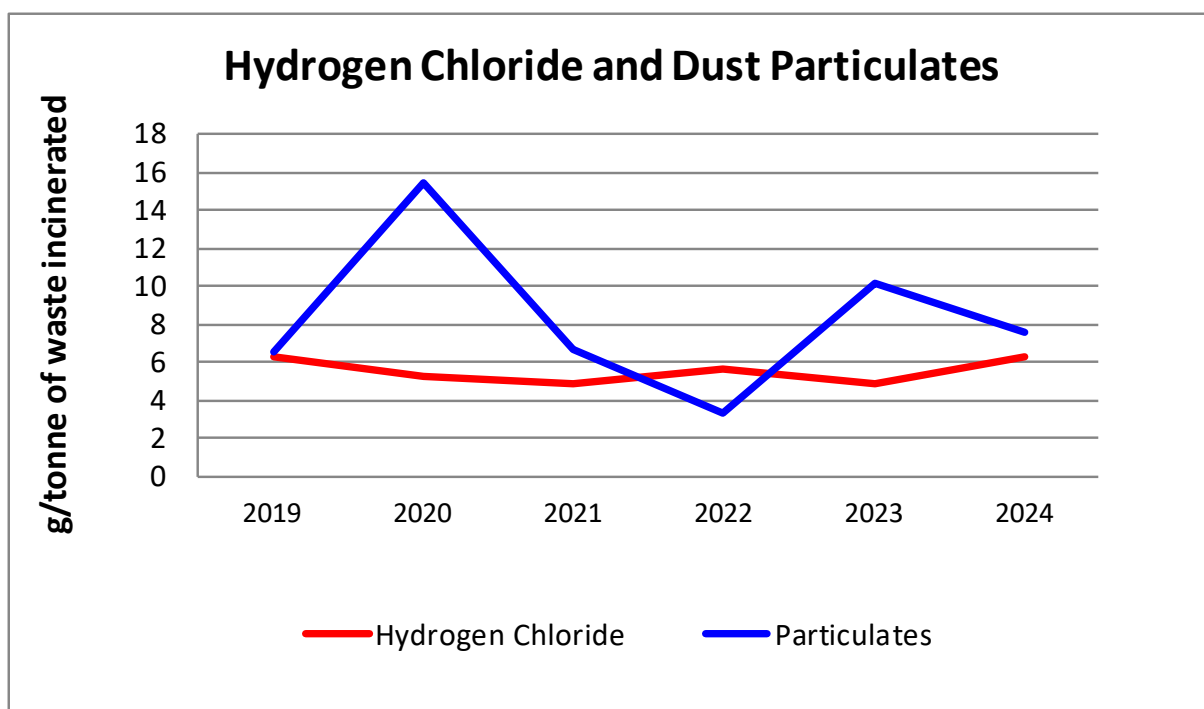
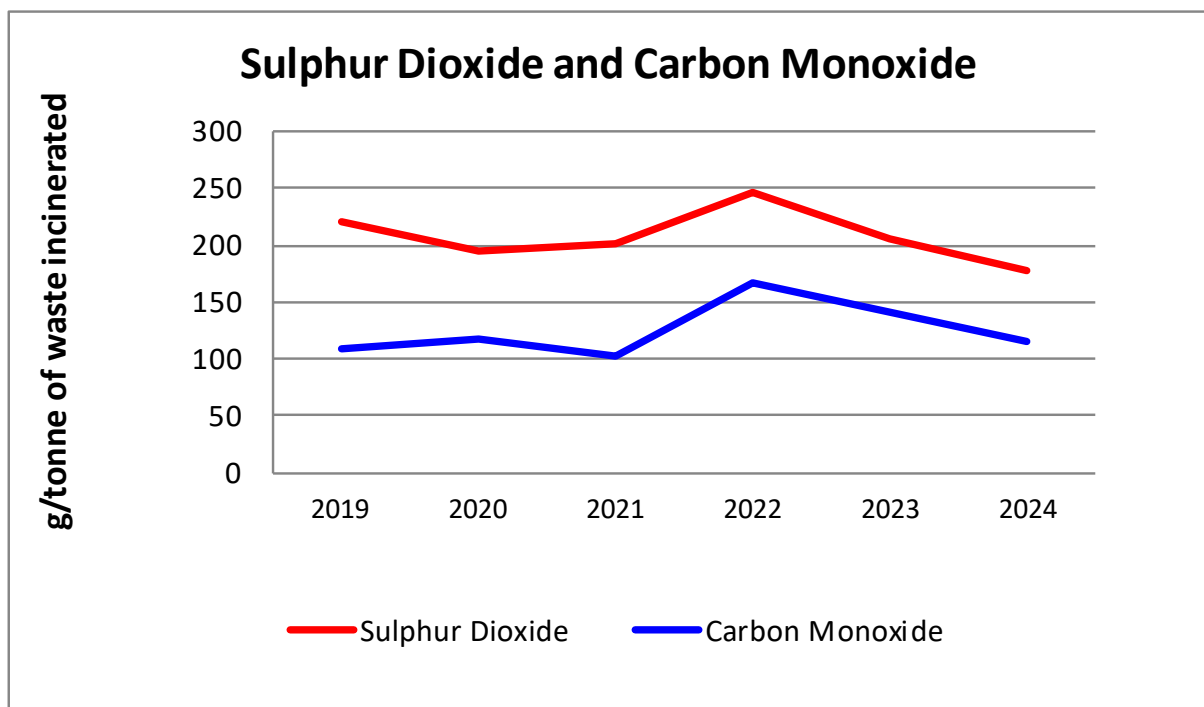
INDICATORS PER TONNE OF WASTE PROCESSED	2024	2023	2022	2021	2020
Incinerated metal (tonnes)	0.017	0.02	0.027	0.027	0.027
APC Residue (tonnes)	0.042	0.044	0.04	0.038	0.041
Bottom Ash (tonnes)	0.152	0.153	0.146	0.14	0.15
Electrical Generation	MWh	MWh	MWh	MWh	MWh
Electrical energy exported	0.062	0.185	0.36	0.36	0.36
Electrical energy consumed	0.069	0.071	0.076	0.075	0.07
Water Usage/Discharges	M¹	M²	M³	M³	M³
Town's water consumed	0.377	0.29	0.41	0.38	0.36
River/Borehole water abstracted	0.006	0.512	1.09	1.23	1.22
Effluent discharged to sewer	0.202	0.253	0.36	0.4	0.39
Gas Usage	Cu ft	Cu ft	Cu ft	Cu ft	Cu ft
Gas consumed	8.12	12.64	13.08	13.42	9.11

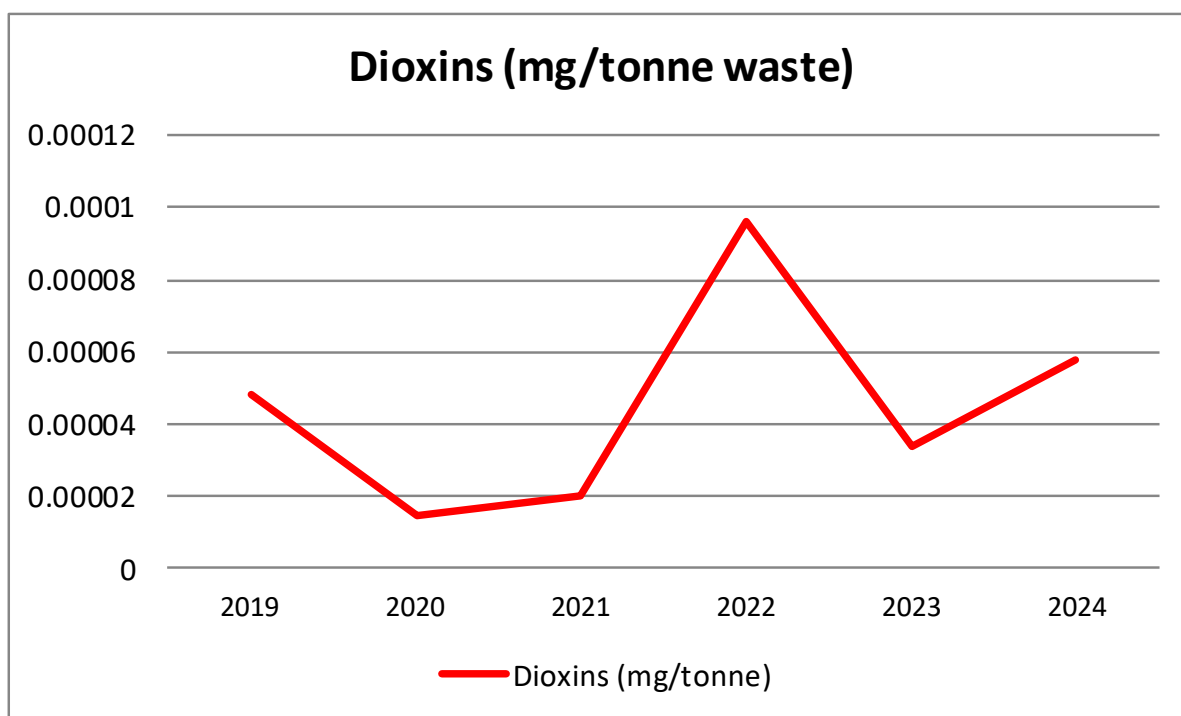
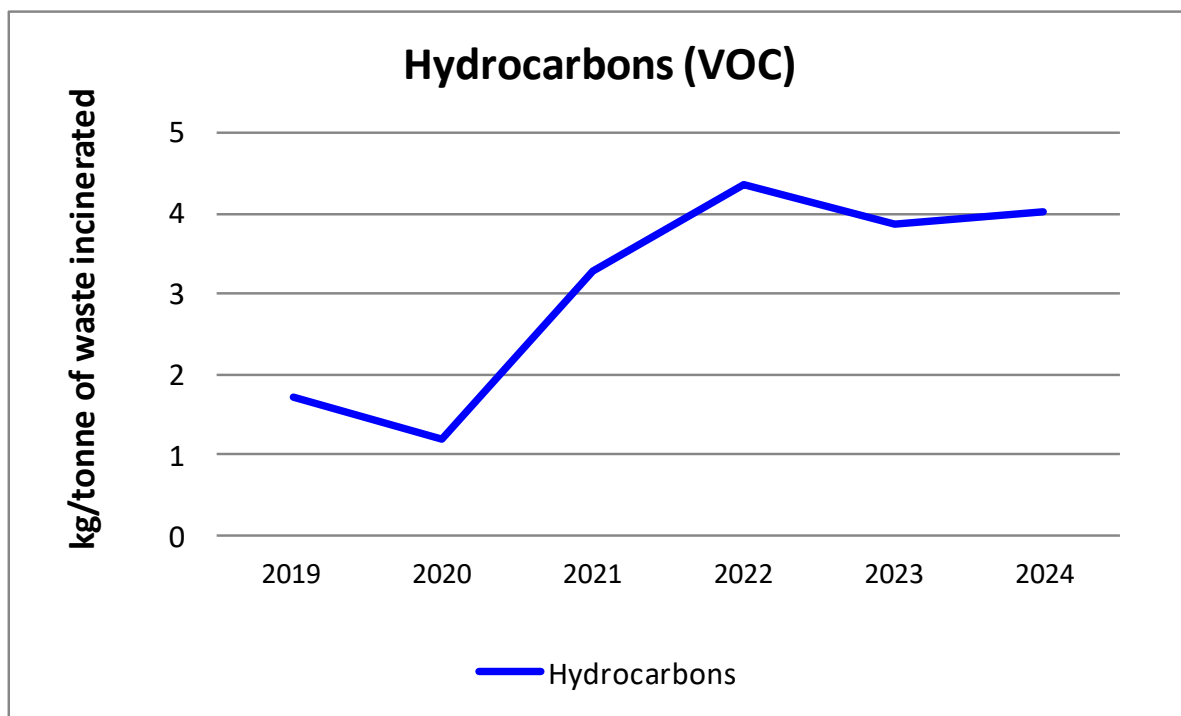
Water use trends 2024



APPENDIX 4 – EMISSION PERFORMANCE (last 5 years)







Note* Dioxins are present in such small numbers that the limits of detection relating to the instruments used can affect overall results. The 2022 result is not excessive, though it is higher than other years

APPENDIX 5 - SAFETY HEALTH AND ENVIRONMENT IMPROVEMENT PLAN 2024

CSWDC 2024 IMPROVEMENT PLAN						Status
#	Objective	Project Description	By When?	Who?	Information / Comment	
1	EH&S	Improve plant identification, labelling and drawings	Dec-24	Ops	This project is continued from 2021 and will continue to be carried out in parts over the next year due to the size of the task.	✓
2	Safety	Stores racking outside the stores is in need of modernisation as the area is difficult to keep in an orderly state due to its design	Sep-24	Eng	New racking with more stable and easy to use storage to be sourced and installed to improve the facility	✓
3	Safety	Fire and smoke doors to be modernised on the main stairwell in the main building to ensure they provide the correct smoke and fire rating for the risk	Dec-24	Eng	A suggestion from the fire inspection. Door and frame structures to be checked with seals and glazing being brought up to correct standards.	✓
4	Safety	Contractor management improvements to be implemented as per insurer consultant report from SRS	Apr-24	EHS, Eng	Improvements to be implemented as per the report - contractor checks to be increased and documentation revised as recommended.	✓
5	Environment Health and Safety	Rainwater capture system to be considered as a business and environmental impact case	Oct-24	Eng, EHS	Water capture and storage systems to be investigated for consideration as a future project for non-potable applications. Legionella risk will need to be considered	✓
6	Health and Safety	Weighbridge project will provide improvements to space and traffic/pedestrian interfaces?	Oct-24	Eng, Waste	Improvements in traffic management and pedestrian segregation. Consider H&S aspects in the design processes and route layout.	✓
7	Environment	Consider the use of green technology in the design of the replacement lodge office block to give a reduction in environmental impact/carbon footprint	Dec-24	Eng, EHS	Consider modern technology in the design, lighting, heating, ventilation, stand-alone solar powered systems, insulation, etc.	✓
8	Safety	Improve bunker hall/crane deck door interlocks with crane to improve flexibility of access for more than one person	Mar-24	Eng, Ops,	Revised system to be installed which prevents lock-ins	✓
9	Environment	Improve and reduce emissions of NOx and NH3 slip in line with the BREF changes	Dec-24	Ops, Eng, EHS	Investigate and determine differences causing elevated emissions values compared to historical values. Consider seasonal impacts on the feed stock and the combustion processes to ensure all foreseeable	✓
10	Safety	Consider ways to improve the permit to work office layout to ensure improved security and separation from persons awaiting permits	Dec-24	Ops, EHS	Possible relocation of office or improvement of designs to enable the fire exit to remain in place whilst providing the desired result.	✓
	COMPLETED	✓	IN PROGRESS	▲	OVERDUE	X

APPENDIX 6 OBJECTIVES AND TARGET RESULTS FOR 2024

Objectives:

To prevent pollution, increase recycling, reduce waste and reduce the use of natural resources within company processes.

To reduce accidents and risks of injury and ill health to all persons working for us or on our behalf, whilst raising awareness of hazards and reinforcing a culture where no hazard is ignored.

To maintain our existing certifications to ISO14001 and OHSAS18001 management systems.

Target Attainment 2024: (see 3.5 and 4.1 for more details)

Env 1	2 or less breaches of environmental permit for the year	✓	H&S 1	Increase behavioural conversations ≥22 a month	✓
Env 2	Reduce NOX emissions to BREF ELVs whilst controlling NH ₃ slip to <15mg/m ³ daily average (IC1 from the EPR permit)	✓	H&S 2	Reduce the number of injuries to persons (staff, contractors, MoPs, visitors) to below the previous 3 year average (12/year)	✓
Env 3	Zero valid environmental complaints for the year	✗	H&S 3	Reduce RIDDOR reportable injuries to zero for the year	✗
Env 4	Assess gross electrical efficiency of the plant (IC4 of the EPR permit)	✓	H&S 4	To maintain near miss reporting at its current level. Target is ≥ 144 for the year (12/MONTH)	✓
EHS 1	Perform area inspections (40) and audits (38) to the respective plan for the year	✓	H&S 5	Carry out ≥ 5 x emergency response mock scenarios in the year	✓
EHS 2	Ensure all incident reports are effectively actioned	✓	H&S 6	To identify and manage all instances of work related ill health affecting employees	✓

Targets for 2025

Env 1	2 or less breaches of environmental permit for the year		H&S 1	Increase behavioural conversations ≥22 a month	
Env 2	Implement the climate change adaptation risk assessment and embed it into the management system, and set up annual review		H&S 2	Reduce the number of injuries to persons (staff, contractors, MoPs, visitors) to below the previous 3 year average (Target = 11/year max)	
Env 3	Zero valid environmental complaints for the year		H&S 3	Reduce RIDDOR reportable injuries to zero for the year	
Env 4	Continue the OTNOC plan in accordance with the EPR permit		H&S 4	To maintain near miss reporting at its current level. Target is ≥ 144 for the year (12/MONTH)	
EHS 1	Perform area inspections (44) and audits (40) to the respective plan for the year		H&S 5	Carry out ≥ 5 x emergency response mock scenarios in the year	
EHS 2	Ensure all incident reports are effectively actioned		H&S 6	To identify and manage all instances of work related ill health affecting employees	

SAFETY HEALTH AND ENVIRONMENT IMPROVEMENT PLAN 2025

#	Objective	Project Description	By When?	Who?	Information / Comment	Status
1	Health	Improve sealing of the refuse bunker to the 3rd floor offices to prevent maggot and subsequent fly ingress when bunker stock is high. Include flooring renewal and refresh of ceiling tiles.	Dec-25	Projects	All breaks between the bunker and corridor to be filled, ceiling to be modernised	
2	HR & Training	Review training record requirements / compliance and consider software options to automate HR records, training records and payroll process	Sep-25	HR / FD	Improve training record management and data management around HR and payroll records	
3	Health	Consider an in-house expertise for the safe removal of low content asbestos gaskets. Cost saving and improved controls when dealing with contaminated materials.	Sep-25	EH&S Eng	Legislation to be checked and training sourced for potential willing staff	
4	Safety	Improvements to the ash crane daily check process. Improve reliability and safety of drivers when undertaking the relevant checks	Jun-25	Ops Waste	GP3 to be finalised and arrangements to be implemented for weekdays and weekends	
5	Environment	Covered area for waste paint IBCs at the HWRC. Storage IBCs are becoming waterlogged increasing haz waste disposal weights, cost saving and haz waste impact reduction.	Dec-25	Projects Waste	Install a covered structure to protect the area from rain ingress	
6	Health and Safety	Improvements to the nominated supervisor setting to work systems to improve effectiveness of pre-work checks.	Oct-25	Ops Eng Waste	Changes in systems to ensure general safety before and during works	
7	Environment	Install modernised 'green' heating and lighting systems to the renovated admin lodge.	Mar-25	Projects	New lodge to feature energy efficient technology	
8	Environment	Consider IC1 lower NOX and NH3 options from RJM and Martin proposals	Jun-25	Ops Eng CPC	Costs benefit analysis to be undertaken to decide on the technology used	
9	Safety	Review categorisation of confined spaces to provide a more pragmatic approach based on risk, reducing costs and time whilst not reducing any levels of safety.	Sep-25	EHS Ops Eng	Re-assess the confined spaces on site to ensure all are relevant and properly controlled whilst avoiding incorrectly categorising any restricted areas as confined spaces	
10	Health and Safety	Review PPE for opening boiler doors online.	Mar-25	Ops EHS	Assess the risk of working with open chamber doors and select PPE based on the risk	
11	Safety	SSOW – Nisoft PTW system to include revised RA etc. – deliver new updated system to optimise and improve SSOW.	Dec-25	Ops EHS	Finalise and implement new PTW system	
12	EH&S	Departments to undertake IT file housekeeping to remove duplicate items or items that are obsolete.	Dec-25	All	All departments to check SharePoint and clear any redundant documents	
	COMPLETED	✓	IN PROGRESS	▲	OVERDUE	✗

GLOSSARY OF TERMS

BAT	best available technique
BREF	best available technique reference document
EA	Environment Agency
ELV	emission limit value
G1/G2	generator 1 / generator 2
HSE	Health and Safety Executive
HWRC	household waste recycling centre
IBA	incinerator bottom ash
KPI	key performance indicator
RAMS	risk assessment and method statement
RIDDOR	reportable injuries diseases and dangerous occurrences