Environmental Management System:
Non-Hazardous Waste Management Procedure
<table>
<thead>
<tr>
<th>Version</th>
<th>Governance Group</th>
<th>Date Approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Sustainability Committee</td>
<td>15 March 2021</td>
</tr>
<tr>
<td>2.0</td>
<td>Sustainability Committee</td>
<td>1 April 2022</td>
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</tbody>
</table>
Non Hazardous Waste Management Procedure

<table>
<thead>
<tr>
<th>Lead:</th>
<th>Facilities Manager, Estates and Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed by:</td>
<td>Bronwen Eastaugh, Environmental Associate</td>
</tr>
<tr>
<td>Approved by:</td>
<td>Sustainability Committee</td>
</tr>
<tr>
<td>Date Approved:</td>
<td>1 April 2022</td>
</tr>
<tr>
<td>Date due for Review:</td>
<td>31 March 2023</td>
</tr>
<tr>
<td>ISO 14001:2015 Clause:</td>
<td>8.1</td>
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**Purpose**

This procedure details how non-hazardous wastes and recycling processes are managed across UK and Malta campuses of Queen Mary, University of London (Queen Mary) in order to:

- Address the risks and opportunities associated with the waste aspect
- Ensure that waste documentation is stored and maintained
- Increase the amount of material segregated for recycling
- Ensure compliance with relevant environmental legislation

**Scope**

This procedure covers the storage and disposal of all non-hazardous waste streams across Queen Mary’s UK and Malta campuses.

**Definitions (ISO14001:2015)**

- **Risks and Opportunities**: potential adverse effects (threats) and potential beneficial effects (opportunities)
- **Procedure**: Set of interrelated or interactive activities, which transforms inputs into outputs.

**Responsibilities**

<table>
<thead>
<tr>
<th>Role / Position</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head of Sustainability</td>
<td>Coordinates training and learning opportunities for all interested parties and relevant stakeholders on environmental compliance as well as risks and opportunities associated with non-hazardous waste management.</td>
</tr>
</tbody>
</table>
| Facilities Manager (Supported by the Assistant Facilities Managers) | • Coordinates the management of all non-hazardous wastes generated across Queen Mary’s Campuses.  
  • Ensure that all Queen Mary appointed non-hazardous waste... |
<table>
<thead>
<tr>
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<tr>
<td></td>
<td>hold relevant permits / licences / exemptions</td>
</tr>
<tr>
<td></td>
<td>• Collation of all non-hazardous waste data for annual Estates Management Record (EMR) submissions</td>
</tr>
<tr>
<td></td>
<td>• Ensure that all Queen Mary’s licences / permits / exemptions are up to date</td>
</tr>
<tr>
<td></td>
<td>• Ensure that all Waste Transfer Notes (WTN) are correctly completed and kept for a minimum period of two years.</td>
</tr>
<tr>
<td>Facilities and Resources Manager (Malta Campus)</td>
<td>• Coordinates the management of all non-hazardous wastes generated at Queen Mary’s Malta Campus.</td>
</tr>
<tr>
<td></td>
<td>• Ensure that all appointed non-hazardous waste hold relevant permits / licences / exemptions</td>
</tr>
<tr>
<td></td>
<td>• Ensure that all Waste Transfer Notes (WTN) are correctly completed and kept for a minimum period of two years.</td>
</tr>
<tr>
<td>Head of Catering Services</td>
<td>• Responsible for managing all waste cooking oil generated across Queen Mary’s UK campuses.</td>
</tr>
<tr>
<td>Cleaning Operatives &amp; Janitors</td>
<td>• Responsible for the collection, transport of all waste streams from internal waste storage receptacles to waste storage locations.</td>
</tr>
<tr>
<td>Porters</td>
<td>• Responsible for storing wastes into the compactors/skips</td>
</tr>
<tr>
<td></td>
<td>• Responsible for the relocation and collection of office furniture, classroom equipment and room and events set up.</td>
</tr>
<tr>
<td>Grounds and Garden Operatives</td>
<td>• Responsible for appropriately storing all grounds and gardens wastes</td>
</tr>
<tr>
<td>All staff, Students and Visitors</td>
<td>Ensure that all waste are appropriately segregated based on the waste management hierarchy and correctly stored in stored.</td>
</tr>
<tr>
<td>Sustainability and Environment Manager</td>
<td>Responsible for the periodic audit of this procedure and associated activities against relevant regulations and ISO 14001:2015 EMS clauses and ensure that corrective actions are put in place to address any non-conformance(s).</td>
</tr>
<tr>
<td>Queen Mary’s Environmental Associates</td>
<td>• Responsible for the review of this procedure in conjunction with all relevant stakeholders and interested parties.</td>
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</table>

**Related Documents**

This procedure is linked to:

- Queen Mary’s Environmental Policy 2021
Non-Hazardous Waste Management Overview

Waste
Waste is defined in the European Waste Framework Directive 75/442/EEC as any "substance or object, which the producer or the person in possession of it discards or intends to discard or is required to discard". All scrap materials, any unwanted materials, or any substance or article that is broken, worn-out, contaminated or spoiled and which the user intends to dispose of are classified as waste.

Waste Storage Collection Locations
Any designated area within Queen Mary’s premises at which waste storage bins, containers or skips are stored. Only designated waste collection points must be used for storing wastes or recyclable materials for collection for treatment or disposal. These storage locations must not constitute public health and/or health and safety risks.

Duty of Care
This is a requirement that all waste producers, importers, carriers and those involved in the disposal of waste take all reasonable steps to ensure that wastes are properly segregated, described, stored, transported and treated or safely disposed of.

Waste transfer Note (WTN)
A WTN is a document, which demonstrates that all non-hazardous wastes generated across Queen Mary’s premises or as a result of its operations, are properly collected, treated or safely disposed. WTNs must be kept for a minimum period of two years.

Waste Producer(s)
Any Queen Mary’s employee, staff, volunteer and visitors whose activities generate waste, is a waste producer. It is the responsibility of everyone across Queen Mary to ensure that any waste they generate is safely handled, appropriately segregated and stored in line with this procedure, all relevant regulations and standards.

Non-Hazardous Waste Management Process
The following waste streams are managed by our Engineering and Estates Management Team:
1. Mixed recyclables
2. General waste
3. Food waste
4. Glass
5. Waste skips (Bulky waste)
6. Sanitary waste
7. Grounds and garden waste
8. Confidential waste
9. Toner cartridges

The catering department is responsible for the control and disposal of waste cooking oil.

**Dry Mixed Recycling (DMR)**

These are non-hazardous materials that can be used in their current state or can be processed or modified to be reused. Recyclable materials must be placed in the correct colour coded plastic bags and stored appropriately in DMR containers across Queen Mary’s premises. Some examples of dry mixed recycling materials are:

- Metals: such as food cans, drinks cans, biscuit and chocolate tins. Excluding metals generated in our workshops
- Paper: such as: office paper; newspaper and magazines; paper bags; catalogues and greeting cards
- Plastics: such as: margarine tubs; yoghurt pots; bottles; plastic film and bubble wraps
- Cardboards: such as boxes and food sleeves that must be flattened before disposed into the dry mixed recycling containers

The Process below summarises how DMR is managed across Queen Mary:

1. Suitable bins for the segregation of dry mixed recycling and general waste are provided internally and externally around campus

2. **Bags**
   a. Mile End Campus (ME): Green plastic bags are used to line internal DMR bins
   b. Whitechapel Campus (WC): Red plastic bags are used to line internal DMR bins
   c. Charterhouse Square Campus (CHS): Green plastic bags are used to line dry mixed recycling bins
   d. Department W: Red plastic bags are used to line internal DMR bins
   e. Empire House: Red plastic bags are used to line internal DMR bins
   f. Malta Campus: Grey bags are used to line all internal DMR bins
3. Waste bags are removed from internal bins and transported to the relevant temporary waste areas and placed in the correct waste storage bins, which is clearly labelled

4. Waste Contractor empties the external waste storage bins based on agreed collection schedule at all locations apart from behind the curve and between Creed and Beaumont Courts (Mile End Campus), where the external bins are transported by the Janitors to the 14yrd recycling compactor.

**General / Residual Waste**

All forms of non-confidential and non-hazardous waste or unwanted materials generated across Queen Mary’s premises, or vehicles, that cannot be recycled are regarded as general/”residual” wastes. These wastes must be placed in black plastic bags and stored appropriately in the general waste bins available across all Queen Mary’s premises. Some examples of general wastes are:

- Non-Compostable food wastes;
- Food contaminated materials;
- Tissues, paper towels and serviettes;
- Tea bags and serviettes;
- All non-hazardous and non-healthcare wastes generated from any Queen Mary’s premises or vehicles.

The Process below summarises how General Waste is managed across Queen Mary:

1. Suitable bins for the segregation of dry mixed recycling and general waste are provided internally and externally around campus

2. **Bags**
   a. Mile End Campus (ME): Black plastic bags are used to line internal general waste bins.
   b. Whitechapel Campus (WC): Clear plastic bags are used to line internal general waste bins
   c. Charterhouse Square Campus (CHS): Clear plastic bags are used to line internal general waste bins
   d. Chislehurst Sports Ground (CSG): Clear plastic bags are used to line internal general waste bins
   e. Department W: Black plastic bags are used to line internal general waste bins
   f. Empire House: Clear plastic bags are used to line internal general waste bins
   g. Malta Campus: Black plastic bags are used to line internal general waste bins
3. Waste bags are removed from bins by Cleaning Operatives/Grounds Operatives and transported to the relevant temporary waste areas and placed in the correct external waste storage bins, which is clearly labelled.

4. Waste Contractor empties external waste storage bins based on agreed collection schedule at all locations apart from behind the curve and between Creed and Beaumont Courts (Mile End Campus). The external waste storage bins here are transported by the Janitors and to the 30 general waste compactor recycling compactor.

The process flow charts summarises the recycling and general waste management procedure

All staff and students are responsible for the disposal of waste into appropriate bins

Recycling waste stored in labelled bins with:
- Green Bags: ME, CHS
- Red Bags: WC, Department W, Empire House

General waste placed in labelled bins with:
- Black Bags: Mile End, Department W
- Clear Bags: CHS, WC, CSG, Empire House

Cleaners remove waste sacks from internal bins, grounds operatives remove waste sacks from external bins, check they are not contaminated and store them in the 1100L waste bins at designated temporary waste storage location for the building.

Cleaning porters transport 1100L bins from the temporary waste storage locations, to the waste compound.

Waste Contractor Empties 1100L Bins on site based on agreed collection schedule.

Dispose of recyclable waste from the 1100L recycling bins into the recycling waste compactor

Dispose of all non-recyclable waste, including contaminated recycling waste from the 1100L general waste bins into the general waste compactor

Remove accessible loose cardboard from 1100L bins and place into the baler.

Waste contractors collect all 3 waste streams as per the waste schedule
**Cardboard Waste**

Currently there are 2 cardboard segregation and compaction locations at the Mile End Campus. These are located adjacent the Curse Restaurant and the delivery areas within the Residential areas.

The process for signposting of this cardboard is as follows:
- Staff flat pack the cardboard and place in the brown towable 1100L bin
- Porters tow the 1100L bin to the recycling area
- Cardboard is placed in the baler and baled
- Once 4 bales have been made, the waste contractor is contacted to make collection by the Facilities Manager.
- Waste contractor makes collection and disposed of the cardboard bales.

**Food Waste (UK Campuses)**

1. All food waste from Whitechapel and Mile End are deposited at the Mile End campus, a buggy from the catering team transfers the food waste between the campuses.
2. There are food waste bins distributed across our Department W building. These bins are lined with clear plastic bags and the Cleaning Operatives empty these bins into a food waste storage bin that is currently located at the basement of this building.
3. Suitable bins and bags for the segregation of compostable and non-compostable food waste are provided at The Curve Catering Outlet. Smaller bins are provided in all Queen Mary catering outlets to store tea bags.
4. 120L blue food waste bins are available for non-compostable food waste, bags are used for compostable food waste and 60L brown bins are used for tea bags.
5. Blue non-compostable food waste bins are collected by Queen Mary’s appointed waste collected service contractor from behind The Curve. Bags with compostable waste are emptied by the Ground and Garden Operatives into the compost bays located within the car park located within the Student Village of the Mile End Campus.

**Food Waste (Malta Campus)**

Food wastes generated at the Cafeteria of our Malta campus are segregated from general waste and DMR and are collected by the Facilities Management Contractor.
The Flow chart below details the food waste management procedure

**Confidential Wastes**

Confidential wastes contain either personal or sensitive information. These wastes must be placed in designated confidential waste receptacle, securely stored and disposed in compliance with the Freedom of Information Act 2000 (Section 46), Environmental Information Regulations 2004, Data Protection legislation and the General Data Protection Regulation (GDPR), examples of confidential information include but not limited to:

- Data collected under a guarantee of confidentiality
- Any person identifiable information
- Any document which reveals the contact details, financial or health details of an individual
- Job applications
- References
- Interview notes
- Employees’ performance review information
- Any record which if made public before a certain period may breach commercial confidentiality
- Any record that may breach intellectual property rights
The penalties for not complying with Data Protection legislation could be severe both to individuals and to Queen Mary. Therefore, it is everyone’s responsibility to ensure that confidential waste are securely and appropriately stored.

**Confidential Wastes / Materials (UK Campuses)**
Confidential wastes and materials are put into white shredding bags ready for collection by the Porters. The Porters are responsible for ensuring that these materials are safely stored for collection and shredding by Queen Mary’s appointed Confidential Waste Service Contractor.

**Confidential Waste / Material (Malta Campus)**
These are shredded in the first instance and stored in a blue bin. These materials are collected for treatment and disposal by our appointed Facilities Management Contractor.

**Grounds and Garden Waste**
Queen Mary composts its garden waste and has a T23 - Aerobic composting and associated prior treatment waste exemption. All non-compostable garden waste are stored by the Grounds Operatives in the bulk waste skip located at the yard.

Currently generation of garden wastes is not applicable to our Malta campus.

**Waste Cooking Oil (Mile End Campus)**
Waste cooking oil from the catering outlets are transferred directly into the main waste compound by the catering staff and stored in 1100 L containers placed within appropriately sized bunds. These wastes are managed by our Head of Catering Services.

**Waste Cooking Oil (Mile End Campus)**
This waste stream is not currently applicable to our Malta Campus as the fryers are not being used. However, there is the intention to start using fryers once the kitchen project is completed. After the commissioning of these fryers; a grease trap will be used to collect grease and waste cooking oil.

**Toner Cartridges (UK Campuses)**
HP recycling boxes are placed across Queen Mary’s campuses for storing toners. Each box can hold 150-200 cartridges. Once the boxes are full; relevant staff raises ticket through the IT services helpdesk for the collection of these wastes.
**Toner Cartridges (Malta Campus)**

Toners are placed back into their original boxes and segregated from other waste streams by the Cleaners for collection by our appointed Facilities Management Contractor.

**Glass (UK Campuses)**

Glass waste from the catering outlets, venues and halls of residences are transferred directly to the relevant waste storage locations and stored within the 240L bottle storage containers.

**Glass (Malta Campus)**

Glass waste is separated from other waste and stored in designated 120L bins. These bins are collected for treatment and disposal by our appointed Facilities Management Contractor.

**Waste Skips - Bulk Waste (UK Campuses)**

Bulk wastes are often generated during premises clear-outs or de-cluttering. Appropriate skips must be used to store these wastes. Details on how skips should be used are as follows:

- Skips must be used for temporary storage of all bulk wastes from our premises
- Skips must be ordered via Queen Mary’s Estates and Facilities Help Desk
- Skips must not be used to store hazardous wastes
- Skips must not be used to store waste electrical and electronics equipment (WEEE)
- Queen Mary’s Estates and Facilities team must be informed to arrange the removal of these skips as soon as possible.

Bulky wastes are stored within designated skips located within the waste compounds. These are exchanged weekly by Queen Mary’s appointed Waste Collection Service Contractors.

**Waste Skips - Bulk Waste (Malta Campus)**

Bulk wastes is separated and disposed of into appropriately sized skips ordered by generator of these wastes and the Facilities and Resources Team coordinate the removal of these skips.

**Sanitary Wastes (UK Campuses)**

Sanitary wastes are solid, non-infectious, personal hygiene waste such as disposable nappies, pads and tampons. There are sanitary waste receptacle(s) across all Queen Mary’s premises.
Sanitary and hygiene wastes must not be mixed with other waste streams or flushed down any water closet (toilet).

Access is provided for contractors to exchange the sanitary waste bins from the Residential Halls and all Queen Mary’s buildings. The sanitary bins are exchanged after 09:00 Hours and all students are notified of scheduled sanitary waste bins replacements.

**Sanitary Wastes (Malta Campus)**
Sanitary waste is collected every Monday and Thursday and is disposed of with non-hazardous waste (black bag).

**Waste Licences**
Queen Mary currently have the following waste exemptions and permits for:

1. Lower Tier Waste Carrier Dealer (CBDL78320 and CBDL31116)
2. T23 - Aerobic composting and associated prior treatment waste exemption (WEX267153)\(^1\)

\(^1\) Expires 29 February 2024
**Waste Inventory**

The waste inventory details the commonly generated non-hazardous wastes generated across Queen Mary’s campuses.

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<tr>
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<tbody>
<tr>
<td>Dry Mixed Recycling</td>
<td>200101</td>
<td>Bywaters</td>
<td>CBDU100793</td>
<td>29 April 2025</td>
<td>Bywaters, Twelvetrees Crescent, E3 3JG</td>
<td>SP3093EA/V004</td>
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<tr>
<td>General Waste</td>
<td>200301</td>
<td>Bywaters</td>
<td>CBDU100793</td>
<td>29 April 2025</td>
<td>Cory Riverside, Norman Road North, Belvedere DA17 6JY</td>
<td>Smuggler's Wharf MRF and Transfer Station (FP3598VA/A001 and KP3690EV/T005); Walbrook Wharf Transfer Station (DP3691ND/S003); Cringle Dock Transfer Station (GP3790EN/T008); Northumberland Wharf Transfer Station and Amenity Site (FB3605LE/T001 and GB3332AD/T001); Belvedere Riverside Resource Recovery Facility (FB3038AB/A001).</td>
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<td>Glass</td>
<td>200102</td>
<td>Bywaters</td>
<td>CBDU100793</td>
<td>29 April 2025</td>
<td>Bywaters, Twelvetrees Crescent, E3 3JG</td>
<td>SP3093EA/V004</td>
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<td>Food Waste</td>
<td>200108</td>
<td>Bywaters</td>
<td>CBDU100793</td>
<td>19 November 2024</td>
<td>Bio Collectors Ltd 10 Osier Way, Mitcham Surrey, CR4 4NF</td>
<td>JB3737WE</td>
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<tr>
<td>Confidential Waste</td>
<td>200101</td>
<td>G&amp;M</td>
<td>CBDU84584</td>
<td>28 February 2025</td>
<td>5A North Crescent E16 4TG</td>
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<td>Sanitary Waste</td>
<td>180104</td>
<td>Citron Hygiene</td>
<td>CBDU292164</td>
<td>6 June 2022</td>
<td>Barking Site Unit 3 New England Industrial Estate</td>
<td>EPR/HB3804FZ</td>
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<tr>
<td>Garden Waste</td>
<td>020103</td>
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<td>29 April 2025</td>
<td>Cory Riverside, Norman Road North, Belvedere DA17 6JY</td>
<td>Smuggler’s Wharf MRF and Transfer Station (FP3598VA/A001 and KP3690EV/T005); Walbrook Wharf Transfer Station (DP3691ND/S003); Cringle Dock Transfer Station (GP3790EN/T008); Northumberland Wharf Transfer Station and Amenity Site (FB3605LE/T001 and GB3332AD/T001); Belvedere Riverside Resource Recovery Facility (FB3038AB/A001).</td>
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<tr>
<td>Cooking Oil</td>
<td>200125</td>
<td>Bywaters</td>
<td>CBDU67998</td>
<td>22 November 2024</td>
<td>Oileco Northampton Road Blisworth, Northamptonshire NN73DW</td>
<td>EPR/LP3032NC</td>
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<td>Toner Cartridges</td>
<td>160216</td>
<td>Apogee – Uses Clover Germany GmbH</td>
<td>CBDU93735</td>
<td>19 November 2023</td>
<td>In den Wolfsmatten, Ettenheim 77955, Germany</td>
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<td>All Non-hazardous waste streams</td>
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<td>FM Core Limited²</td>
<td>GBR/12/01354/22</td>
<td>31 December 2022</td>
<td>Wasteserv Malta Ltd in Xewkija Gozo</td>
<td>EP 0022/21 (Expiry Date 12 October 2025)</td>
</tr>
</tbody>
</table>

² Valley Mansions, Level 1, Msida Valley Road, Birkirkara, Malta, BKR 9023
**Documented Information**

All documented information relating to the disposal of all non-hazardous wastes generated across Queen Mary’s UK campuses are held by the Facilities Manager, Estates and Facilities, while for our Malta Campus, these are held by the Facilities and Resources Manager (Malta Campus).

Relevant documented information include:
- Waste contractors and agreements
- Copies of waste contractor licenses
- Waste transfer notes
- Evidence of communications relating to the waste management process.

**Effects and Actions on Non-Conformance**

Failure to comply with this procedure may result in:
- Non-conformance with the ISO 14001:2015 standard
- Civil and / or criminal prosecution

Departure from this procedure is addressed in the Non-Conformance, Corrective and Preventive Action Section of our Environmental Management System.

**Version Control**

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