



COMPLEX
WASTE SOLUTIONS

Landfill is a design failure. **So we design it out.**

Our environmental approach, how we measure it, and
what we will and will not claim on your behalf.

SUSTAINABILITY & ENVIRONMENTAL POLICY

Waste hierarchy routing · Diversion & carbon reporting
Circular recovery · Scope 3 data for your ESG reporting

Complex Waste Solutions

Waste broker registration CBDU613407

The environmental decision is made at the point of routing.

A broker does not treat waste. What a broker does is decide where every tonne goes — and that single decision determines whether a stream is recycled, burned for energy, treated, or buried. It is the highest-leverage environmental decision in the chain, and it is the one we own on your behalf.

That is why our environmental commitments are about routing discipline rather than offsets or badges. We are judged on where your waste actually ended up, and we report it in a form your auditors can use.

THE STATUTORY WASTE HIERARCHY

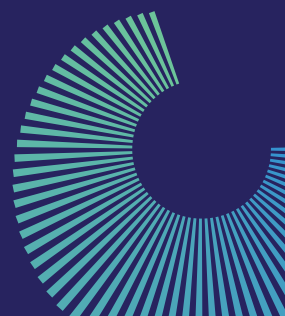
Set by the Waste (England and Wales) Regulations 2011. We apply it stream by stream.

- | | | |
|---|-----------------------------|---|
| 1 | Prevention | Do not generate it at all. Process change, supplier take-back, correcting over-ordering, container choice. |
| 2 | Preparing for re-use | Reconditioned IBCs and drums, container return loops, off-spec product brought back to spec and resold. |
| 3 | Recycling | Solvent recovery, metals, plastics, oils re-refined to base oil, organics to anaerobic digestion. |
| 4 | Other recovery | Energy from waste, fuel blending, cement kiln substitution. Useful, and far better than landfill — but it is not recycling. |
| 5 | Disposal | Incineration without energy recovery, and landfill. The rung we are working to empty. |

WHAT WE WILL NOT CLAIM

Zero to landfill is not the same as zero impact.

Most zero-to-landfill claims in UK industry rest heavily on energy from waste, which sits on the recovery rung, not the recycling rung. We will always show you the split between recycling and recovery rather than reporting a single diversion figure and leaving you to infer the rest.



How a stream actually moves up the hierarchy.

Streams do not improve on their own. Each of these is a change we have made, or would look to make, on an industrial site.

Mixed waste solvent

Incineration → **Solvent recovery & fuel blending**

Sample across a full production cycle, then split the grades. Halogen content usually decides it.

Waste hydraulic & engine oil

Fuel burn → **Re-refined to base oil**

Keep it dry and uncontaminated at source; water ingress is what pushes oil down to burn.

DAF and food processing sludge

Effluent treatment → **Anaerobic digestion**

Test for acceptance, then contract a schedule so it never becomes an emergency tanker call.

IBCs, drums and kegs

Disposal as contaminated → **Reconditioning & return loop**

Rinse regime plus a dedicated storage bay. Often pays for itself in container purchase alone.

Metal-bearing filter cake

Hazardous landfill → **Smelter refining**

Assay the cake. Nickel, copper and zinc content frequently makes it a feedstock rather than a waste.

Mixed general waste skip

Landfill or EfW → **Segregated dry recyclates**

Bin position and labelling at source does more than any downstream sorting contract.

Contaminated absorbents & PPE

Hazardous landfill → **Energy recovery as RDF**

Switch to a reusable spill kit where the contaminant allows, then route what is left to recovery.

Aerosols and gas cartridges

Hazardous disposal → **Degassing & metal recycling**

Puncture-and-degas plants recover both the propellant and the steel or aluminium shell.

Every stream is re-tested, not set and forgotten

Classifications drift as processes change. We re-assess each stream at least annually, and immediately on any production change you tell us about.

Numbers your auditors **can use.**

A diversion percentage on its own is not evidence. Every contracted site gets a quarterly return built from consignment and transfer note data, reconciled to what the outlets actually received.

● Tonnage by stream and EWC code	Reconciled against consignment and transfer notes, not estimated from container volumes.
● Diversion from landfill	Percentage by weight, with the landfilled residue itemised by stream so it can be targeted.
● Recycling vs recovery split	Reported separately, always. Energy from waste is never counted as recycling in our returns.
● Carbon by disposal route	tCO2e using published waste treatment factors, mapped to Scope 3 Category 5 for your reporting.
● Collection and haulage data	Number of collections and estimated road miles, so consolidation shows up as a measurable saving.
● Outlet register	Every facility used in the period, with permit number and permit status at the time of receipt.

WHERE THIS LANDS IN YOUR REPORTING

Scope 3, Category 5

Waste in operations is a reportable GHG Protocol category. Our tonnage-by-route data feeds it directly.

ISO 14001

Objectives, targets and operational control evidence for the waste aspect, ready for surveillance audit.

Customer & SECR audits

Site-level diversion evidence with the permit trail behind it, not a supplier letterhead assurance.

EXTRACT FROM A QUARTERLY RETURN

STREAM	TONNES	ROUTE	HIERARCHY RUNG
Waste solvent	96.2	Solvent recovery & fuel blend	Recycling
Waste oil	41.8	Re-refined to base oil	Recycling
Dry mixed recycling	64.0	Materials recovery facility	Recycling
Oily water	128.4	Physico-chemical treatment	Other recovery
Contaminated absorbent	12.6	Refuse-derived fuel	Other recovery
Residual waste	3.1	Energy from waste	Other recovery
Landfilled residue	0.0	—	Disposal
Total managed	346.1	100% diverted	58% recycling / 42% recovery

Illustrative layout only — your return is built from your own consignment and transfer note data.

OUR COMMITMENTS

Things we control, with **dates on them.**

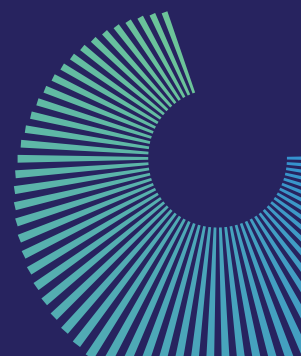
We have deliberately kept these to commitments that sit inside our own decision-making. We are a brokerage: we do not run the treatment plants, so promising outcomes we cannot deliver would be worth nothing to you.

- | | |
|---|-----------------|
| ● Every stream assessed against the waste hierarchy before first collection, and re-assessed at least annually. | In place |
| ● Recycling and recovery reported separately on every return — no single blended diversion figure. | In place |
| ● Every outlet permit-verified before first use and re-verified on expiry, with the register shared on request. | In place |
| ● Quarterly tonnage, diversion and carbon reporting to every contracted site. | [target date] |
| ● 100% of managed tonnage diverted from landfill. | [target date] |
| ● Majority of managed tonnage routed to re-use or recycling rather than energy recovery. | [target date] |

OUR OWN FOOTPRINT

Small directly. Large by influence.

As a brokerage our direct emissions are an office and a car. That is not where our impact sits, and we will not pad a sustainability document by dwelling on it. Our environmental weight is entirely in the routing decisions we make for customers and in the collection consolidation that takes vehicles off the road. Those are the numbers we report and the ones we expect to be held to.



WHAT MOVES THE NEEDLE ON YOUR SIDE

- Segregation at source. It is the single biggest determinant of which rung a stream can reach.
- Keeping oils and solvents dry. Water ingress is what pushes a recyclable stream down to burn.
- Storage that lets us collect a full load rather than repeated part loads.
- Early notice of process changes, so a classification is reviewed before the first collection rather than after it.
- A named contact who can approve a route change without it going round the houses.

OUTCOMES

What the routing work **has produced.**

SPECIALITY CHEMICALS, TEESSIDE

Waste solvent re-characterised across a production cycle. Two of three grades moved from high-temperature incineration to solvent recovery and fuel blending, held in place by a segregated IBC regime on the plant.

68% OF VOLUME MOVED OFF DISPOSAL

11 mth SEGREGATION HELD

AUTOMOTIVE TIER 1, WEST MIDLANDS

Fourteen streams re-mapped and consolidated to three treatment partners. Oily water and coolant re-routed to recovery; swarf and press oil separated at source rather than sorted downstream.

100% DIVERSION FROM LANDFILL

6 to 1 SUPPLIERS, FEWER VEHICLE MOVEMENTS

FOOD & BEVERAGE, LINCOLNSHIRE

DAF sludge tested and accepted by an anaerobic digestion outlet 40 miles from site, replacing ad-hoc effluent tankering for the bulk of the volume.

AD REPLACED EFFLUENT TREATMENT

0 EMERGENCY TANKER CALL-OUTS SINCE

WHERE TO START

A hierarchy review of your site.

Half a day on site, and you get every stream mapped against the hierarchy, the outlets available above where each one currently sits, and an honest view of which moves are worth making.

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