Waste Management Plan

Location: Ardagh Group Wrexham Plant
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Position: EHS Manager
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1. Purpose
This Waste Management Plan (WMP) has been developed to ensure that all waste generated from site activities, including the proposed Line Five expansion project, is managed in accordance with applicable legal requirements, environmental obligations, and the waste hierarchy.
The plan aims to minimise waste generation, maximise opportunities for reuse and recycling, prevent pollution, and ensure that waste is stored, handled, transported, and disposed of in a safe and compliant manner. It also provides a framework for managing the anticipated increase in waste arising during both the construction and operational phases of the Line Five expansion, ensuring adequate waste infrastructure, segregation controls, and collection arrangements are in place to support continued compliance and environmental performance.

Objectives:
• Minimise waste generation.
• Promote reuse and recycling.
• Prevent pollution.
• Ensure compliance with environmental legislation.
• Improve waste management performance.

2. Scope
This plan applies to: All main site activities including maintenance

3. Responsibilities
Plant Manager is overarching responsible for the legal requirements of the site with the leadership team supporting and maintaining the requirements set out by the Welsh legislation, they will do this by ensuring adequate resources are available, monitor compliance with this plan, and review waste management performance.

Shift leaders and Leaders will ensure waste segregation requirements are followed. Conduct inspections where necessary report waste management issues.

Employees and Contractors will dispose of waste correctly. Prevent contamination of recyclable materials. Segregate all waste appropriately according to Welsh regulations, Report spills and environmental incidents.

4. Waste Hierarchy is used where possible, Prevention, Reduction, Reuse, Recycling, Recovery and Disposal all waste and will be controlled using an approved waste management contractor.

5. Waste Stream Register
Waste Type | EWC Code | Hazardous (Y/N) | Storage Method | Disposal/Recycling Route

6. Waste Storage Arrangements
General Waste Location: Drum Park
Recyclable Waste Location: Drum Park and Waste storage Area located near Warehouse

Hazardous Waste Location: Waste storage Area located near Warehouse and in Drum Park for smaller dry waste using waste safes or IBCs.

7. Waste Segregation Requirements
Since 6th April 2024 all waste generated on site shall be segregated at source into designated waste streams. Recyclable materials including paper/cardboard, glass, metals, plastics, food waste, wood, WEEE and hazardous wastes shall be stored in clearly identified containers and managed in accordance with the Waste Separation Requirements (Wales) Regulations 2023.

8. Approved Waste Contractors
Contractor Name: FCC Environment
Waste Carrier License Number: CBDU82236
Expiry Date: 25th March 2028
Waste Type Managed

9. Documentation and Records
Waste Transfer Notes will be kept for two years by Ardagh Group
Ardagh Group will for three years keep Consignment Notes
Waste Carrier Licenses held on a database.
Recycling Reports issued monthly by waste management company.
Waste Audit Records kept and maintained by Ardagh Group.
Training Records held by Ardagh Group
Environmental Inspection Records to be kept internally and through waste management company.

10. Training Requirements
All personnel whose activities may affect waste management shall receive appropriate training and awareness on waste segregation, recycling requirements, hazardous waste controls, environmental responsibilities, and site waste management procedures. Training records shall be maintained and reviewed periodically by the training department.

11. Inspection and Monitoring
Waste storage areas, skips, bins, and waste segregation arrangements shall be inspected regularly to verify compliance with site procedures and legal requirements. Waste performance data, including recycling rates, waste volumes, contamination incidents, and contractor compliance, shall be monitored and reviewed monthly. Any deficiencies identified shall be recorded, investigated, and corrected to support continual environmental improvement.

12. Waste Reduction Targets
Waste reduction targets are established and managed at Group level by Ardagh Group Central and are reviewed annually as part of the Company's environmental and sustainability objectives. Site waste performance is monitored against these targets, with a focus on reducing waste generation, increasing recycling rates, and maximising resource recovery. This approach supports compliance with the Waste Separation Requirements (Wales) Regulations 2023, which promote waste prevention, recycling, and the diversion of recyclable materials from landfill and incineration in line with the waste hierarchy.

13. Proposed Line Five Expansion

As part of the proposed Line Five expansion, every effort will be made to minimise waste generation in accordance with the waste hierarchy. Existing waste management arrangements will be reviewed to ensure they remain suitable for the increased operational demands. Where necessary, waste containers will be increased in size and located in designated waste storage areas to maintain effective segregation and housekeeping standards.

During the construction phase of the Line Five project, an increase in waste collections is anticipated due to building and installation activities. Once Line Five becomes operational, waste volumes are expected to increase, with some waste streams potentially doubling compared to current levels. A summary of the predicted waste volumes and the proposed collection frequencies is provided in the table below.
The areas highlighted in green indicate existing waste streams where increased volumes and collection frequencies are anticipated. The areas highlighted in orange represent a new waste stream associated with the proposed effluent treatment system. This waste will be generated through the filtration of wastewater and coolant and is not currently produced at the Wrexham site. However, a similar system operates successfully at the Rugby facility, and it is expected that waste volumes generated at Wrexham will be broadly comparable to those reported by Rugby on an annual basis. The proposed changes will be monitored and reviewed following project completion to ensure waste storage capacity, collection frequencies, and recycling arrangements remain adequate and compliant with applicable environmental legislation and site requirements.

Waste

Waste Type	Current 2025 Quantity [kg]	Predicted Volumes
Mixed Municipal	56000	112,000
Packaging - Non-Contaminated	72360	144,720
Paper & Cardboard	112068	224,136
Wood	37400	74,800
Solid Contaminants	3700	7,400
Lacquer / Solvents / Cleaners	89601	179,202
Packaging - Contaminated	67320	134,640
Machine Coolant	535707	803,560
Oil	12700	25,400
Electrical Waste	4490	8980

Collections and Types

Type of Waste	Type Of Container	No. of Containers	Proposed Number	Call off frequency	Proposed Call Off frequency
Compactor - General Waste	35yd RoRo	1	1	Every 3 weeks	Every 2 weeks
Plastic Widgets	20yd skip	1	1	On demand	On demand
Cardboard & Paper	Euro 1100L	3	4	weekly	2 x weekly
Wood	40yd RoRo	1	1	On demand	Weekly
Cardboard cores	35yd RoRo	1	1	Weekly	2 x Weekly
Plastic & Mixed Metals	Euro 1100L	3	4	Weekly	Weekly
Food	240L	1	2	Weekly	Weekly
plastic recycling	40yd RoRo	1	1	On Demand	Weekly
Mixed Metals	40yd RoRo	1	1	On Demand	Weekly
Haz Waste	Waste Safes	6	12	Every 2 weeks	Weekly
Liquid Haz Waste	Tanker	2	2	On Demand	On Demand
Filter Cake	40yd RoRo	2	Unknown	Unknown	Unknown