# **Document 1: Supplier Onboarding & Compliance Kit (Food Waste / UCO)**

**ID:** GNR-SUP-KIT-001 **Version:** 1.0 **Effective Date:** [Date] **Issued By:** Genesis Reloop Compliance Department

### **Welcome to the Genesis Reloop Supplier Partnership**

This kit provides the essential information and procedures for supplying Food Waste and Used Cooking Oil (UCO) to our facilities. Our partnership is built on a shared commitment to sustainability, quality, and regulatory compliance. Adherence to these standards is mandatory and ensures the integrity of the circular economy we are building together.

### **1.0 General Supplier Requirements**

All suppliers, regardless of the material provided, must meet the following baseline criteria:

* **Waste Carrier Licence:** You must hold a valid, current Waste Carrier, Broker, and Dealer registration from the relevant UK environmental authority (EA, NRW, SEPA). A copy must be provided to us annually.
* **Insurance:** You must maintain adequate Public and Product Liability insurance.
* **Communication:** You must provide a reliable primary contact for scheduling and operational queries.

### **2.0 Feedstock Acceptance Criteria: Food Waste**

**2.1 Quality & Contamination Thresholds** All food waste must be source-segregated and meet the following criteria. Loads failing to meet these standards will be rejected at the supplier’s cost.

| Parameter | Acceptance Limit | Rejection Trigger | Notes |
| --- | --- | --- | --- |
| **Physical Contaminants** | < 2% by weight | > 2% by weight | Contaminants include plastic, glass, metal, stones, and other non-biodegradable items. |
| **Packaging** | Must be minimal and easily separable | Excessive, non-removable packaging | We operate de-packaging equipment, but heavily packaged goods may be rejected. |
| **Prohibited Materials** | Not present | Any presence | Includes hazardous waste, chemicals, construction debris, dead animals, and liquid oils. |
| **pH Level** | [Specify range, e.g., 4.0 - 9.0] | Outside specified range | Indicates potential contamination or spoilage beyond acceptable limits. |

**2.2 Container Requirements** - **Type:** Bins (e.g., 240L, 660L, 1100L wheelie bins) or sealed skips. - **Condition:** Containers must be in good condition, watertight, and free from major damage. Lids must be present and functional. - **Labelling:** Each container must be clearly labelled as “Food Waste Only” and “Category 3 Animal By-Product”.

### **3.0 Feedstock Acceptance Criteria: Used Cooking Oil (UCO)**

**3.1 Quality & Anti-Fraud Thresholds** All UCO must be 100% derived from the cooking or frying of food. Adulteration with virgin oils, other fats, or non-food grade oils is strictly prohibited and will result in immediate termination of our supply agreement.

| Parameter | Acceptance Limit | Rejection Trigger | Notes & Fraud Indicator |
| --- | --- | --- | --- |
| **Free Fatty Acids (FFA)** | [e.g., 2% - 15%] | < 2% or > 15% | *An FFA content below 2% is a strong indicator of adulteration with fresh vegetable oil.* |
| **M.I.U. (Moisture, Impurities, Unsaponifiables)** | < 2% total | > 2% total | High M.I.U. indicates poor quality, water contamination, or presence of solid waste. |
| **Source Certification** | ISCC Certified | Not certified | We only accept UCO covered by a valid ISCC (or equivalent) sustainability certification. |
| **Visual Inspection** | Amber/brown liquid, free of solid debris | Cloudy, excessive solids, unusual smell | Indicates contamination with water, food waste, or other chemicals. |

**3.2 Container Requirements** - **Type:** Sealed containers such as 60L/120L/200L drums or 1,000L Intermediate Bulk Containers (IBCs). - **Condition:** Containers must be clean, leak-proof, and suitable for transporting liquids. - **Labelling:** Each container must be clearly labelled as “Used Cooking Oil” and “Category 3 Animal By-Product”.

### **4.0 Operational & Documentation Procedures**

**4.1 Pick-up Scheduling & Communication** - **Scheduling:** Pick-ups will be scheduled at agreed-upon intervals or on-demand via [Email Address/Portal URL]. A minimum of [e.g., 48 hours] notice is required for on-demand requests. - **Confirmation:** The pick-up is not confirmed until you receive a confirmation email or notification from our logistics team. - **Access:** You must ensure clear and safe access for our vehicles at the scheduled time. Any delays or failed pick-ups due to access issues may be chargeable.

**4.2 Completing Transfer Documentation** Accurate documentation is a legal requirement under the Duty of Care.

* **Waste Transfer Note (WTN):** A WTN must be completed for every single collection.
* **Annex VII Form:** For any UCO sourced from outside the UK (e.g., Republic of Ireland), a completed Annex VII document must accompany the WTN.
* **Guide to Completion:**
  1. **Section A (Description):** Use the correct description and EWC code.
     + Food Waste: “Biodegradable kitchen and canteen waste”, EWC 20 01 08.
     + UCO: “Used Cooking Oil”, EWC 20 01 25.
  2. **Section B (Your Details):** Fill in your company name and address. Sign and date.
  3. **Section C (Our Details):** We will provide our details.
  4. **Both parties must sign** the document at the point of transfer. You must retain a copy for **2 years**.

**4.3 Providing Compliance Evidence** To meet our audit requirements (e.g., under ISCC), we require evidence of feedstock origin and collection. - **UCO Collections:** For each collection point, provide geo-tagged photos of the collection containers at the Point of Origin (e.g., restaurant kitchen). - **Sustainability Proof:** For UCO, a valid Proof of Sustainability (PoS) document must be provided for each consignment, corresponding to the volumes collected.

### **5.0 Supplier Declaration Form**

*This form must be signed by an authorised representative and returned to Genesis Reloop before the supply agreement can be activated.*

**SUPPLIER SUSTAINABILITY & ANTI-FRAUD DECLARATION**

**Supplier Name:** [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_]

On behalf of the supplier named above, I hereby declare and warrant that:

1. We hold a valid Waste Carrier Licence, number [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_], and will maintain it throughout our agreement with Genesis Reloop.
2. All material supplied will be accurately described and classified on all transfer documentation in accordance with UK law.
3. **For UCO Suppliers:** All Used Cooking Oil supplied to Genesis Reloop is 100% derived from waste streams of cooking or frying processes and is not adulterated with virgin oils, palm oil, or any other non-waste feedstock. We acknowledge that fraudulent misrepresentation of feedstock is a criminal offense and will result in immediate contract termination and potential legal action.
4. We have implemented internal controls to ensure the integrity of our supply chain and the traceability of the materials we collect.
5. We will provide Genesis Reloop or its designated auditors with access to relevant records and sites upon reasonable notice to verify compliance with these terms.

**Signed:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Print Name:** [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_]

**Title:** [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_]

**Date:** [\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_]

### **6.0 Non-Compliance & Corrective Action Workflow**

If a supplier provides non-compliant material, the following process will be initiated:

graph TD  
 A[Non-Compliance Identified] --> B{Quarantine Load};  
 B --> C[Notify Supplier Immediately with Evidence];  
 C --> D[Raise Formal Non-Conformance Report (NCR)];  
 D --> E{Investigate Root Cause};  
 E --> F[Supplier to provide Corrective Action Plan within 5 working days];  
 F --> G{Plan Approved?};  
 G -- Yes --> H[Implement & Monitor];  
 G -- No --> F;  
 H --> I[Close NCR];  
 C --> J[Arrange Return/Disposal of Rejected Load at Supplier's Cost];

*Persistent non-compliance will lead to a review and potential termination of the supply agreement.*

### **7.0 Legal & Regulatory Sources**

* The Environmental Protection Act 1990 (Duty of Care)
* The Waste (England and Wales) Regulations 2011
* Animal By-Products (Enforcement) (England) Regulations 2013
* International Sustainability & Carbon Certification (ISCC) System Documents
* Regulation (EC) No 1013/2006 on shipments of waste (Waste Shipment Regulation)
* UK RTFO biodiesel UCO.md
* ISCC certification biodiesel UCO.md
* UK Duty of Care waste management.md

# **Document 2: Internal Audit Program & Regulator Inspection Readiness**

**ID:** GNR-AUD-PGM-001 **Version:** 1.0 **Effective Date:** [Date] **Approved By:** [Compliance Manager Name/Title]

### **1.0 Purpose and Scope**

**1.1. Purpose** This document establishes the framework for Genesis Reloop’s internal audit program and defines the protocol for managing inspections by external regulatory bodies (e.g., Environment Agency, APHA, HSE, DfT, HMRC). The objective is to ensure continuous compliance, identify areas for improvement, and demonstrate robust governance to all stakeholders.

**1.2. Scope** This program applies to all operational and administrative activities across both the Anaerobic Digestion (AD) and Biodiesel production facilities.

### **2.0 Internal Audit Program**

Our internal audit program is designed to proactively assess compliance and operational excellence.

**2.1 Annual Audit Schedule Template** The Compliance Manager will maintain an annual audit schedule. Audits will be planned based on risk and operational significance.

| **Area / System to Audit** | **Q1** (Jan-Mar) | **Q2** (Apr-Jun) | **Q3** (Jul-Sep) | **Q4** (Oct-Dec) | **Lead Auditor** |
| --- | --- | --- | --- | --- | --- |
| **Feedstock Reception & Control (ABP/UCO)** | [X] |  | [X] |  | [Name] |
| **DSEAR Compliance & ATEX Register** |  | [X] |  |  | [Name] |
| **Environmental Permit Compliance (Emissions/Waste)** | [X] |  | [X] |  | [Name] |
| **PAS 110 / EN 14214 Quality Systems** |  | [X] |  |  | [Name] |
| **ISCC Mass Balance & Traceability** |  |  | [X] |  | [Name] |
| **Health & Safety (Permit-to-Work, COSHH)** |  | [X] |  | [X] | [Name] |
| **Data & Record Management** |  |  |  | [X] | [Name] |

**2.2 Risk-Based Sampling Strategy** The frequency and depth of audits are determined by risk. - **High-Risk Areas (audited semi-annually or quarterly):** - Animal By-Product (ABP) handling and segregation. - Methanol storage and handling (DSEAR, COSHH). - ISCC mass balance records (High fraud risk). - Critical emission points (CHP stack, effluent discharge). - **Medium-Risk Areas (audited annually):** - General waste management (Duty of Care). - Permit-to-Work system effectiveness. - Quality control lab procedures. - **Low-Risk Areas (audited bi-annually or as needed):** - Office administrative procedures. - General site housekeeping.

**2.3 Corrective Action / Preventive Action (CAPA) Workflow** All audit findings must be logged and managed through the CAPA process.

graph TD  
 A[1. Audit Finding Identified] --> B[2. Log Finding in CAPA Register];  
 B --> C[3. Investigate Root Cause];  
 C --> D[4. Define & Implement Corrective Action (Fix the immediate issue)];  
 D --> E[5. Define & Implement Preventive Action (Stop it from happening again)];  
 E --> F[6. Verify Effectiveness of Actions after set period];  
 F --> G{Actions Effective?};  
 G -- Yes --> H[7. Close CAPA Record];  
 G -- No --> C;

**2.4 Evidence Management Blueprint** All compliance evidence must be stored logically for easy retrieval. The following digital folder structure is mandatory:

S:\Compliance\  
├── Environmental\_Permits\  
│ ├── [Permit\_Number\_AD]\  
│ │ ├── Application  
│ │ ├── Permit\_Document  
│ │ └── Regulatory\_Correspondence  
│ └── [Permit\_Number\_Biodiesel]\  
├── Audits\  
│ ├── 2025\  
│ │ ├── Internal\_Q1\_Feedstock\  
│ │ └── External\_EA\_June\  
│ └── 2026\  
├── Certifications\  
│ ├── ISCC\  
│ ├── PAS110\  
│ └── ISO\_14001\  
└── Monthly\_Returns\  
 ├── EA\  
 ├── HMRC\  
 └── DfT\_RTFO\

Physical records must be filed in a corresponding labelled system in the compliance office.

### **3.0 Regulator Inspection Readiness Plan**

**3.1 The Inspection Day Playbook** When a regulator arrives (announced or unannounced): 1. **Reception:** Greet them professionally, ask for identification, and have them sign in. 2. **Notification:** Immediately notify the **Plant Manager** and **Compliance Manager**. 3. **Escort:** Escort the inspector to the designated Inspection Room. *Never leave an inspector unaccompanied on site.* 4. **Opening Meeting:** The designated ‘Host’ will lead a brief opening meeting to understand the scope and purpose of the inspection.

**3.2 Assigned Roles**

| Role | Primary | Secondary | Key Responsibilities |
| --- | --- | --- | --- |
| **Host** | Plant Manager | Compliance Manager | Main point of contact. Manages the inspection flow, answers high-level questions. |
| **Scribe** | Admin Assistant | [Assigned Person] | Takes detailed, factual notes of all discussions, requests, and observations. |
| **Subject Matter Expert (SME)** | H&S Manager, QA Manager, etc. | N/A | Called upon to answer specific technical questions related to their area of expertise. |
| **Runner** | [Assigned Person] | [Assigned Person] | Responsible for retrieving requested documents or information promptly. |

**3.3 Inspection Room Preparation** The main meeting room will be the designated Inspection Room and must be kept ready. - [ ] **Ready Document Pack:** A physical binder containing: - Copy of the Environmental Permit(s). - Site plan showing key locations and drainage. - H&S Policy Statement. - List of key site contacts and responsibilities. - [ ] **Equipment:** Whiteboard, pens, projector, and reliable internet access. - [ ] **Refreshments:** Water, tea, and coffee available.

**3.4 Sample Site Walk-through Route** A standard inspection route should be planned to demonstrate compliance points logically. 1. **Site Boundary:** Discuss sensitive receptors, boundary monitoring points (noise/odour). 2. **Weighbridge & Reception:** Show feedstock acceptance, documentation check, and rejection procedures. 3. **ABP Handling Area:** Demonstrate segregation between ‘unclean’ and ‘clean’ areas. 4. **Tank Farm & Bunding:** Show secondary containment, bund integrity, and labelling. 5. **Process Area:** Explain safety features (DSEAR zones, ATEX equipment, gas detection). 6. **Control Room:** Show process monitoring (SCADA) and alarm systems. 7. **Laboratory:** Demonstrate QC procedures and sample handling. 8. **Digestate/Product Storage:** Explain PAS 110 / EN 14214 storage and dispatch controls. 9. **Emission/Discharge Points:** Visit the CHP stack and final effluent discharge point.

**3.5 Q&A Rehearsals & Conduct Guide** - **Training:** Key personnel will undergo annual media-style training on how to answer inspector questions. - **Rules of Engagement:** - **Be Honest & Factual:** Answer the question asked. Do not speculate or offer opinions. - **“I don’t know, but I will find out”** is an acceptable answer. - **Provide Evidence:** Where possible, back up answers with documents or records. - **Correct on the Spot:** If a minor issue is found that can be fixed immediately (e.g., a misplaced label), do so and inform the inspector.

### **4.0 Templates**

**4.1 Corrective Action / Preventive Action (CAPA) Form Template**

| **CAPA FORM** | **NCR Ref:** [NCR-YYYY-XX] |
| --- | --- |
| **Date Raised:** | [Date] |
| **Source:** | Internal Audit / External Inspection / Incident Report / Other |
| **1. Description of Non-Conformance:** | [Detailed description of the finding or issue] |
| **2. Immediate Correction Taken:** | [What was done immediately to contain the issue?] |
| **3. Root Cause Analysis:** | *Why did this happen? (Use 5 Whys or Fishbone as needed)* [Detailed analysis of the underlying cause(s)] |
| **4. Corrective Action Plan (Fix the problem):** | **Action:** [Action to be taken] **Responsibility:** [Name/Title] **Due Date:** [Date] |
| **5. Preventive Action Plan (Stop it from recurring):** | **Action:** [Systemic change to be made] **Responsibility:** [Name/Title] **Due Date:** [Date] |
| **6. Verification of Effectiveness:** | **Method:** [How will we check it worked?] **Verification Date:** [Date] **Result:** [Outcome] |
| **7. Close-out:** | **Signed (Compliance Manager):** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Date:** \_\_\_\_\_\_\_\_\_\_\_\_ |

**4.2 90-Day Remediation Action Plan Template** *(For tracking findings post-audit or inspection)*

| Finding Ref. | Finding Description (Source: [e.g., EA Audit Report]) | Root Cause | Remediation Action | Responsibility | Due Date | Status (Open/In Progress/Closed) |
| --- | --- | --- | --- | --- | --- | --- |
| [001] | [Description of finding] | [Brief root cause] | [Specific action to be taken] | [Name/Title] | [Date] | [Status] |
| [002] | [Description of finding] | [Brief root cause] | [Specific action to be taken] | [Name/Title] | [Date] | [Status] |

### **5.0 Legal & Regulatory Sources**

* Health and Safety at Work etc. Act 1974 (HSWA)
* The Management of Health and Safety at Work Regulations 1999
* Environmental Permitting (England and Wales) Regulations 2016
* DSEAR regulations biogas facilities risk assessment UK.md
* UK Duty of Care waste management.md
* All other foundational compliance documents as per the master outline.