SAUDI BINLADIN GROUP
OPERATION & MAINTENANCE

SBG O&M WASTE MANAGEMENT PROCEDURE

INTRODUCTION

Waste management is a general term used to include all activities associated with the identification, handling, storage, treatment and disposal of wastes.

Pollution prevention is a key element of satisfactory waste management. It relates to the elimination, reduction and control of discharges to water, air or land, and the means and methods by which this is possible. It is important that this aspect is considered and incorporated during design.

A Waste Management Plan is an essential tool for identification and definition of waste streams and categories. It allows potential effects of activities to be identified and thus detrimental environmental effects can be prevented, minimsed and controlled. Additionally, such a plan can deliver several benefits in terms of marketing, environmental and economic growth.

WASTE MANAGEMENT POLICY

SBG O&M undergoes an adequate and up to the standards waste management and disposal policy and procedures as we strongly believe that the environment must be risk free from the hazards associated with the waste material and there must be a Standard operating procedure for the safe disposal of the waste material. The process of the disposing off the waste material is an essential part of our policy and we have also attached the relevant document ensuring the integrity of the procedure with accordance to the SOP'S and regulations followed by the project.

Overview of the Procedure

This procedure is a guide for staff in the disposal, removal and management of waste from the organisation's premises, including general waste, paper and cardboard, redundant furniture and fittings, mobile phones and toner and ink printer cartridges. All staff is responsible for complying with this procedure to ensure the safe and effective management of Considerations

Principles

A range of waste management strategies is undertaken by **SBG O&M** to create a safe, secure and environmentally friendly workplace. The prevention and minimisation of waste material being created is an important method of waste management.

Outcomes

SBG O&M maximises conservation of natural resources and minimises environmental harm through an effective waste management system of recycling and reusing waste products where ever possible

Policy Implementation

Responsible waste management is a shared, day-to-day responsibility. Mechanisms are in place to monitor implementation of this policy. This policy applies to all staff, external waste contractors and clients of **SBG O&M.** Removal of waste from the **Project premises** includes general waste, paper and cardboard, redundant furniture and fittings, mobile phones and toner and ink printer cartridges.

Policy Details

SBG O&M is committed to maximising conservation of natural resources and minimising environmental harm from waste and the disposal of waste. Recycling and reusing waste products, and safe disposal of waste, contributes to an effective waste management system.

Definitions

Waste separation is the process of separating waste at the point of generation and keeping types of waste separate during handling, accumulation, interim storage and transportation

Types of Waste

Clinical waste has the potential to cause sharps injury, infection or public offence. It can include sharps and blood-stained waste, human tissue and laboratory waste.

Related waste is contaminated with cytotoxic, pharmaceutical, chemical or radioactive materials.

Cytotoxic waste may be contaminated with a cytotoxic drug which has been used in the preparation, transportation or administration of chemotherapy.

Pharmaceutical waste includes expired or discarded pharmaceuticals, filters, or other materials contaminated by pharmaceutical products.

Chemical waste is generated from the use of chemicals in medical applications, domestic services, maintenance, laboratories, during sterilisation processes and research.

Radioactive waste is contaminated with radioactive substances which arises from medical or research use of radionuclides.

General waste is any waste that is not classified as clinical or related waste. It includes paper, plastic, glass, liquids and organics.

Hazardous waste includes clinical waste and related waste.

Waste management is the collection, transport, processing, recycling or disposal, and monitoring of waste materials. The term usually relates to materials produced by human activity, and it is generally undertaken to reduce the effects of waste on health, the environment or aesthetics and to recover resources through recycling.

Environmental Policy Statement

SBG O&M believe that businesses are responsible for achieving good environmental practice and operating in a sustainable manner. We are therefore committed to reducing our environmental impact and continually improving our environmental performance as an integral and fundamental part of our business strategy and operating methods.

It is our high priority to encourage our customers, suppliers and all business associates to do the same. Not only is this sound commercial sense for all; it is also a matter of delivering on our duty of care towards future generations.

Our policy is to ensure the following aspects:

- Wholly support and comply with or exceed the requirements of current environmental legislation and codes of practice.
- Minimized our waste and then reuse or recycle as much of it as possible.
- Minimize energy and water usage in our buildings and processes in order to conserve supplies, and minimize our consumption of natural resources, especially where they are non-renewable.
- Apply the principles of continuous improvement in respect of air, water, noise and light pollution from our premises and reduce any impacts from our operations on the environment and local community.
- As far as possible purchase products and services that do the least damage to the environment and encourage others to do the same.
- Assess the environmental impact of any new processes or products we intend to introduce in advance.
- Ensure that all employees understand our environmental policy and conform to the high standards it requires.
- Address complaints about any breach of our Environmental Policy promptly and to the satisfaction of all concerned.

- Update our Environmental Policy annually in consultation with staff, associates and customers.

SBG O&M HSE & Environment Policy makes us responsible for:

- Protecting the Health and Safety of employees, contractors, customers and neighbours.
- Maintaining the security of people and assets.
- Protecting the environment. Will work in close cooperation with customers, suppliers and distributors to
- Comply with all relevant laws and regulatory requirements.
- Ensure that all activities are conducted in a manner consistent with **SBG O&M** Health, Safety, Environment and Security Standards and Guidelines.
- Ensure that business activities are conducted to prevent harm to customers, employees, contractors and public, other stakeholders and the environment.
- Develop, manufacture and market products with full regards of HSE&S aspects, ensure compliance with the **SBG O&M.**
- Protect people, assets, intellectual property and critical information from accidental or deliberate harm, damage or loss.
- Openly communicate on the nature of activities, encourage dialogue and report progress on health, safety and environmental performance.
-
- Regularly monitor the application of this Policy.

LEGISLATIVE REQUIREMENTS

Prosafe will comply with all relevant and applicable national and international legislative requirements and regulations including those of the field development area and client specific codes and standards.

WASTE IDENTIFICATION

In order to effectively and responsibly manage any waste produced it is essential to ascertain the identity of the main waste sources. Subsequently, waste types should be predicted, identified and, where reasonably possible, quantified. At this stage it is also necessary to determine the adverse effects and consequences which may occur as a result of these wastes, and the methods and means by which they can either be eliminated by design, prevented or minimized.

The following sections illustrate typical emissions, discharges and wastes associated with the offshore industry.

Effluent Discharges Environmental Policy

Produced Water

Produced water is perhaps one of the most abundant of all aqueous wastes encountered during offshore developments. In many cases the typical components of this waste will include suspended and dissolved hydrocarbons, production chemicals, inorganic salts and heavy metals.

Cooling Water

The undesired element associated with cooling water is heat which can lead to changes in aquatic diversity at the point of discharge or relocation of some less tolerant species.

Black Water and Grey Water

Black water (sewage) and grey water (wastewater from kitchen, laundry etc) are common effluent discharges. The undesired elements of these wastes are the Biochemical Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) which are responsible for depletion of oxygen levels.

Other Wastes

Garbage-Inert Solid Waste

Wastes under this category will commonly include general garbage, food waste, packaging waste such as paper and plastics, wood, and discarded maintenance and construction materials.

Medical Wastes

Medical wastes include such items as unusable drugs/medicines, used bandages and dressings, blood pockets and sharps.

WASTE CATEGORIZATION

Following identification of the wastes, these wastes must be classified according to categories. All wastes shall be categorized according to Hazardous and Non-hazardous waste.

General Waste Definition

Waste can be defined as any substance that is worn out, unfit for use, or is unwanted.

Hazardous Waste Definition

The following descriptions for hazardous properties are taken from the Special Waste Regulations 1996. A waste satisfying one or more of the properties in the following list can be classed as a Hazardous waste.

"**Explosive**": substances and preparations which may explode under the effect of flame or which are more sensitive to shocks or friction than dinitrobenzene.

"**Oxidizing**": substances and preparations which exhibit highly exothermic reactions when in contact with other substances, particularly flammable substances.

"**Highly Flammable**":

liquid substances and preparations having a flash point below 21°C (including extremely flammable liquids), or

substances and preparations which may become hot or finally catch fire in contact with air at ambient temperature without any application of energy, or

solid substances and preparations which may readily catch fire after brief contact with a source of ignition and which continue to burn or to be consumed after removal of the source of ignition, or

gaseous substances and preparations which are flammable in air at normal pressure, or

substances and preparations which, in contact with water or damp air, evolve highly flammable gases in dangerous quantities.

"**Flammable**": liquid substances and preparations having a flash point equal to or greater than 21°C and less than or equal to 55°C.

"**Irritant**": non-corrosive substances and preparations which, through immediate, prolonged or repeated contact with skin or mucous membrane, can cause inflammation.

"**Harmful**": substances and preparations which, if they are inhaled or ingested or if they penetrate the skin, may involve limited health risks.

"**Toxic**": substances and preparations (including very toxic substances and preparations) which, if they are inhaled or ingested or if they penetrate the skin, may involve serious, acute or chronic health risks and even death.

"**Carcinogenic**": substances and preparations which, if they are inhaled or ingested or if they penetrate the skin, may induce cancer or increase its incidence.

"**Corrosive**": substances and preparations which may destroy living tissue on contact.

"**Infectious**": substances containing viable micro-organisms or their toxins which are known or reliably believed to cause disease in man or other living organisms.

"**Teratogenicity**": substances and preparations which, if they are inhaled or ingested or if they penetrate the skin, may induce non-hereditary congenital malformations or increase their incidence.

"**Mutagenic**": substances and preparations which, if they are inhaled or ingested or if they penetrate the skin, may induce hereditary genetic defects or increase their incidence.

Substances and preparations which release toxic or very toxic gases in contact with water, air or an acid.

Substances and preparations capable by any means, after disposal, of yielding another substance, e.g. a leachate, which possesses any of the characteristics listed above.

"**Eco toxic**": substances and preparations which present or may present immediate or delayed risks for one or more sectors of the environment.

Non-Hazardous Waste Definition

A Non-hazardous waste is not completely harmless but presents a lower level of risk to human health and the environment.

Examples of Hazardous and Non-Hazardous Wastes

Hazardous (or Special)

Examples of hazardous (or special) wastes relevant to the offshore industry include:

- Oils
- Oil-soaked rags
- Used batteries
- Asbestos
- mercury

Non-Hazardous (or Non-Special)

Examples of non-hazardous (or non-special) wastes relevant to the offshore industry include:

- Wood
- Plastics
- Used paper/cardboard
- Scrap metal
- Glass

WASTE REDUCTION, REUSE, RECYCLING AND RECOVERY

Options for reduction reuse, recycling and recovery shall be considered before any wastes are designated for disposal. All reasonably practicable measures shall be taken to minimize the amount of waste in general and of hazardous waste in particular. This option can be both economically and environmentally beneficial and favorable in terms of marketing.

The following breakdown of this waste management hierarchy has been taken from the E&P Forum : Exploration and Production Waste Management Guidelines.

Reduction

The generation of less waste through more efficient practices such as:

- Material elimination;
- Inventory control and management;
- Material substitution;
- Process modification;
- Improved housekeeping.

Reuse

The use of materials or products that are reusable in their original form such as:

- Chemical containers;
- Oily wastes for road construction and stabilization;
- Burning waste oil for energy.

Recycling/Recovery

The conversion of wastes into usable materials and/or extraction of energy or materials from wastes. Examples include:

- Recycling scrap metal;
- Recovering oil from tank bottoms and produced water.

WASTE HANDLING AND STORAGE

Material Safety Data Sheets (MSDS)

Material Safety Data Sheets (MSDS) provide vital information such as the reactivity of a substance, the toxicity, protective equipment required for handling or storage, together with the physical properties of the substance such as melting point, boiling point and flash point. These data sheets are intended to furnish relevant personnel with the required information to allow the activity to be performed safely and without risk. Personnel must always consult Material Safety Data Sheets for any handling, transport or storage of chemical waste. However, in some cases these chemical may have undergone changes and thus it is necessary to perform a characterization study to identify the chemical and physical components in the waste.

The fundamental philosophy regarding the use of hazardous materials / chemicls are

- Elimination
- Substitution
- Reduction
- Protection
- Precaution

6.1 Handling

6.2.1 Segregation

Segregation is the key to good waste management. Segregation of wastes should always be encouraged to identify materials which can be minimized, re-used or recycled and to reduce cross contamination of waste streams

Storage

General

All waste that is temporarily stored and awaiting disposal must be kept secure from vermin, theft, degradation and the generation of pollution and with adequate means of controlling accidental spillage. Such means should include provision for spill containment and readily available spill clean-up materials. Clean-up materials will include, as appropriate, absorbents, save-alls or sumps.

Separate areas within the secure storage will be required to segregate incompatible and reactive waste types and all sharp wastes should be wrapped before disposal.

Hazardous Waste

Hazardous wastes should be stored securely in totally enclosed and locked units wherever practical. Where this is not practical, a secure area with strict entry control should be designated. A detailed manifest of the contents of this skip, together with appropriate material safety data sheets shall accompany the skip at all times. A hazardous waste skip shall be maintained on the facility and when full shall be brought ashore for disposal of the wastes at an appropriate disposal site. The skip documentation must be continually updated.

Old/used hazardous material containers are subjected to the same procedures and shall also be placed in the hazardous waste containers for transport ashore.

Non-Hazardous Waste

Non-hazardous waste shall be collected using recommended safeguards and precautions required (PPE e.g. gloves, dust masks, coveralls, work hoes).

All non-hazardous waste shall be placed in the designated containers and shall be stored securely in pre-determined areas until the waste skip is full and onshore disposal is required.

Training

Management will ensure that all personnel involved in the collection, handling and storage of waste will receive formal waste management awareness training and are competent and fully aware of the dangers, safeguards and precautions required.

WASTE TREATMENT AND DISPOSAL

Waste Documentation

Requirements for waste documentation shall be clearly specified in the detailed waste management procedures. All wastes due for disposal must be identified and quantified with relevant information and hazard warnings All personnel involved in the handling and disposal of such waste shall be informed of such details. At a minimum, waste documentation should include identification of the waste, labeling, dispatch advice notes, waste tracking records and waste inventories. If possible, waste disposal certificates should also be included.

Treatment and Disposal

Treatment and disposal of wastes shall be carried out in a responsible and professional manner by experienced and reputable contractors to eliminate or reduce the possibility of adverse consequences and effects.

All contractors shall demonstrate a strong and consistent level of HSE commitment and competency and provide evidence of existing HSE systems. Contractors shall be subject to an audit programme to verify competence assurance.

SPECIFIC WASTE STREAMS

WASTE STREAM	BOATS	FAC
Sewage	Treated according to MARPOL and discharged to sea.	Treated according to MA sea.
Food Garbage	Macerated and treated as sewage or collected for disposal as non-hazardous waste.	Incinerated onboard the discharged into the sea.
Office Waste	Collected and placed in non-hazardous waste skip for onshore disposal.	Collected and placed in for onshore disposal or i
Scrap Metal	Collected and placed in non-hazardous waste skip for onshore disposal.	Placed in scrap metal wa recycling at disposal site
Packaging/containers for chemicals	None.	Empty packaging/contai sealed containers and re to company. Full/half-full packaging/ necessary and at end us containers and return to applicable accompanied
Packaging/containers for non-hazardous chemicals (full, half-full, or empty)	Sealed as necessary, collected and placed in non-hazardous waste skip for onshore disposal.	Sealed as necessary, coll hazardous waste skip fo

WASTE STREAM	BOATS	FAC
Packaging/containers for hazardous chemicals (full, half-full, or empty)	Sealed as necessary and placed in hazardous waste skip for onshore disposal.	Sealed as necessary, loa placed in hazardous was disposal.
Waste Oil	Stored in holding tank/drums on vessel for onshore disposal.	Stored in holding tank/d onshore disposal.
Medical Waste (including sharps)	Placed in sealed medical waste containers and sent, accompanied by detailed invoice for incineration to disposal site.	Placed in sealed medical sent, accompanied by de incineration to disposal

Machinery Space Drainage Water	Discharged offshore after treatment according to MARPOL (i.e.<100ppm hydrocarbons) or stored in facility holding tank/drums for onshore disposal.	Discharged offshore afte MARPOL (i.e.<100ppm h facility holding tank/dru
Batteries	Loaded onto facility and placed in hazardous waste skip for onshore disposal.	Placed in hazardous was disposal.
Other Non-hazardous Waste	Collected for onshore disposal.	Burnt onboard FPSO or waste skip for onshore d
Other Hazardous Waste	Sealed as appropriate, loaded onto facility and placed in Hazardous waste skip for onshore disposal.	Sealed as appropriate ar waste skip for onshore d

Considerations:

SBG O&M is committed to recycle and reusing waste products where ever possible to produce an effective waste management system that maximises conservation of natural resources and minimises environmental harm.

Procedures

Receptacles for waste paper and cardboard are provided on the premises in offices or at workstations. These are emptied by the housekeeping staff on a weekly basis. If necessary, individual staff may empty waste paper/cardboard into the larger paper/cardboard container in the truck located in the **Basement 2**

General Waste

Rubbish bins for waste other than paper and cardboard are provided on the premises and are emptied by the cleaner. Rubbish bins in the kitchen are used for food waste.

Redundant Furniture and Fittings

Where possible, furniture/fittings in a good state of repair are either reused by the organisation or donated to local service. Broken furniture is to be sent for safe disposal to the tip or collected by local Council. The removal of white goods is negotiated with the deliverer of the replacement white goods.

Photocopier Toner and Printer Ink Cartridges

Where possible, remanufactured toner cartridges are used. When replacing toner cartridges, staffs follows manufacturer's instructions supplied with the toner cartridges for the replacement, storage and disposal of used cartridges. All used toners are placed in the toner cartridge bin located in basement 2. The toner supplier collects used cartridges for recycling when delivering new cartridges.

Risk Management

Risks involved with waste management are regularly assessed, identified and managed.

Employees are trained in waste management, including becoming familiar with types of waste and appropriate, safe handling and disposal methods. Personal protective equipment is accessible available as required. Appropriately qualified staffs supervise handling of related waste.

Waste Separation

The principles underlying waste separation are:

- To reduce the volume of hazardous waste,
- To maintain safety standards during handling, transportation and treatment,
- To eliminate the need for waste separation at disposal sites, and
- To facilitate the recycling process.

Waste Minimisation

All staff minimise waste through strategies such as:

Reducing waste

- Quantifying the waste produced
- Examining each work process steps to determine where wastes are produced and to devise measures for waste prevention or reduction
- Devising ways of reducing waste with employees so they too can share in the savings (for example rewards for employees who reduce waste)
- Partnering with a waste management contractor to assist with waste minimisation.
- Keeping a running tally of waste production to track changes and improvement.

Reusing

- Reusing drums, cartridges and containers where possible.
- Selling or donating waste to other organisations.

Increasing recycling

- Segregating wastes wherever possible to aid recycling and provide an indication of why waste is forming
- Investigating alternative uses for organic waste that cannot be reduced or reused, e.g. composts or convert the waste to energy
- Diverting recyclable wastes from the general waste, identifying recyclers or waste disposal contractors and organising regular collections
- Joining with neighbouring businesses and organisations to get common wastes recycled cost effectively, and discussing waste contractors cost off-sets by efficient serving of the area.

Waste Disposal

SBG O&M employees dispose of waste in accordance with the Waste Management Procedure.

- **General waste** handled with appropriate care.
- **Clinical waste** handled by trained personnel using appropriate personal protective equipment.
- Handling of **related waste** is supervised / undertaken by qualified personnel using appropriate personal protective equipment.
- On daily basis the waste material after the adequate segregation is being to the specified area **60 km** away from the project location to complete the dumping process to ensure the compliance with the environment, health and safety standards.

WASTE MANAGEMENT PROCEDURE OF SBG O&M PROJECTS

1. The waste material and the garbage is collected from the garbage chute room as these rooms are specially designed for this particular phenomenon and these rooms are fully equipped with essential fire preventive and extinguishing equipment. As per design and layout these rooms are spacious enough for the management of waste material and garbage.
2. For the **HARD GARBAGE-** in our project we are taking it manually the garbage on the basement -2 with dump truck i.e. steel, wooden material, gypsum, plastic, glass, sand and all such materials are being disposed in the truck for disposal.
3. For the **RAW GARBAGE-** in our project we are collecting it from the garbage chute room and chuted in the garbage chute is being raised by SSCL cleaners i.e. food items, plastic bags and wrappers.
4. We are disposing all these garbage in dumping zone which is allocated by municipality.
5. The waste is taken by the **special allocated trucks** for the chute and waste material and daily three trucks of same capacity are sent for the disposal area which is situated **60 km** away from the premises of the project.
6. The **separation of the materials** of waste is in-line in an appropriate way so that best utilisation of the waste material can be ensured for the recycling process.
7. The dumping of the most of waste material is observed as it is the best technique to dispose of the waste to ensure the safety of environment and hygiene of the nearby locations.
8. Risks involved with waste management are regularly assessed, identified and managed.
9. Employees are trained in waste management, including becoming familiar with types of waste and appropriate, safe handling and disposal methods
10. Our main scope is to promote the culture of **risk free environment** from the pollutants and the waste material and we believe that in near future we can start our waste recycling plant as the effective utilisation of the resources is an essential part of achieving efficiency.
11. The **Copy of the SOP'S** followed by the SSCL Housekeeping department regarding the disposal of waste material is also attached which clearly mentions the policy and procedure followed by the department.
12. The authorisation of the document is also verified from the Housekeeping coordinator and the Project manager of the project.

13. The safety department ensures that all the garbage chute rooms are well maintained and all the fire preventive and fire extinguishing equipment are in-line in accordance to the standards, all the occupational work i.e. welding, cutting is supervised by the safety department and each and every hazard analysis is evaluated

Functions and Delegations

Position	Delegation/Task
Board of Directors	Endorse Waste Management Policy. Compliance with Waste Management Policy.
Management	Compliance with Waste Management Policy. <u>Safety Consultant</u> Ensure Waste Management Policy aligns with Occupational Health and Safety and Infection Control Policies. Establish and implement systems for waste management. Ensure waste management policies and procedures are effectively implemented. **<u>[Mr. Fatih Nesar]</u>** Responsible for management and implementation of all procedures related to waste management.
Staff	Compliance with Waste Management Policy.

SAMPLE REPORT OF GARBAGE CHUTE ROOM

This is the sample report of the monthly checklist associated with all the garbage chute rooms as the key focus is to ensure the safety of all the locations

CHECKLIST FOR GARBAGE CHUTE ROOM									
Location: Basement 2 to Podium P3M								***Date: JULY 2017***	
Name : SHAHABUDDIN									
S/No	**Floors**	**Land Mark**	**Exhaust Fan/AC**	**Emergency Light**	**Tube Light /Halogen**	**House Keeping**	**Fire Protection Systems**		**Remarks**
							Spr.	S.Det.	
BASEMENT 2									
1	B2	T.A, Z-6	OK	N/A	OK	OK	OK	OK	
2	B2	TB, Z-4	OK	N/A	OK	OK	OK	OK	
3	B2	T.C, Z-3	OK	N/A	OK	OK	OK	OK	
4	B2	TD, Z-1	OK	N/A	OK	OK	OK	N/A	
5	B2	T.H, Z-2	OK	N/A	OK	OK	OK	OK	
6	B2	T.K, SWISS	OK	N/A	OK	OK	OK	OK	
BASEMENT 1									
1	B1	T.A, Z-6,NEAR FHC - 67	OK	N/A	OK	OK	OK	OK	
2	B1	T.B, Z-4, NEAR FHC - 41	_	_	_	_	_	_	DOOR LOCK
3	B1	T.C, Z-3, BESIDE SIMIT SARAYI	OK	N/A	OK	OK	OK	OK	
4	B1	T.D, Z-1	_	_	_	_	_	_	LOCKED
GROUND FLOOR									
1	GF	T.B, Z-4							LOCKED
2	GF	T.C, Z-3, NEAR FHC - 35	OK	N/A	OK	OK	OK	OK	
PODIUM 3									
1	P3	T.A, Z-6	Ok	N/A	OK	OK	OK	OK	
2	P3	T.B, Z-4	Ok	N/A	OK	OK	OK	OK	
PODIUM 3M									
1	P3M	T.B, Z-4	Ok	N/A	OK	OK	OK	OK	
PODIUM 10									
1	P10	T.D, Z-1 NEAR ZAM ZAM SERVICE LIFT	Ok	N/A	OK	OK	OK	OK	
PODIUM 12									
1	P12	T.D, Z-1 NEAR ZAM ZAM SERVICE LIFT	Ok	N/A	OK	OK	OK	OK	

REVIEW AND UPDATES

Effective waste management is an ongoing process and thus regular operational reports on waste management activities shall be made to Prosafe Management.

A review of the estimated type and quantity of all current and foreseeable wastes shall be carried out periodically to allow for future waste disposal planning.

Review and auditing of the Waste Management Programme should be performed periodically by Prosafe with the active participation of the different parties to reflect changes to plant, procedures or processes. Any improvement possibilities or deviations that are identified should be addressed. Waste management practices shall be regularly reviewed, adapted and improved by addressing identified deviations.