BBC Studioworks

Waste Management Elstree Studios

Health & Safety and Sustainability Policy and Arrangements

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1. Overview

In line with the BBC Environmental Sustainability Policy, BBC Studioworks will work towards reducing its environmental impact of waste produced at Elstree Studios through a strategy of reducing waste that goes to landfill. It aims to also maintain a safe and healthy workplace by ensuring all waste is managed appropriately and safely.
As a tenant at Elstree Studios, where waste management services are provided by the landlord, BBC Studioworks works closely with the landlord's management agent to encourage sustainable practices to align with the BBC Sustainability Policy.

2. Statement of Intent

The Waste Management Policy has been produced to affirm BBC Studioworks commitment to safe and efficient waste management, to reduce and recycle waste produced and to ensure compliance with and to exceed legal requirements relating to waste management. It also promotes environmental and recycling issues as an integral element of its activities and demonstrates its commitment to continual improvement in environmental practices.
This Policy provides procedures and arrangements for BBC Studioworks staff in dealing with waste and recycling issues.

Objectives:

- To encourage the use of sustainable materials
- To reduce waste and disposal costs
- To reuse and recycle wherever possible
- Improve workplace and public safety
- Assist clients with meeting their environmental targets
- Actively engage with Industry initiatives to reduce waste

3. Waste Management Strategy

BBC Studioworks undertakes to:

- Follow efficient waste management and recycling procedures throughout and encourage the of use recyclable and recycled materials whenever appropriate.
- Promote a purchasing policy that will give preference, where practicable, to those products and services which cause least harm to the environment.
- Reduce its waste to landfill.

Waste Management Hierarchy:

To achieve these strategy objectives the following management practices will be implemented and prioritised as follows:

- Reduce/Replace
- Re-use
- Recycle
- Recover
- Dispose

Following the waste hierarchy is good practice which businesses should adopt as a matter of course. BBC Studioworks is clearly mandated to follow the waste hierarchy when determining the disposal and or further use of materials.

4. Zero Waste to Landfill (ZWTL)

Elstree Studios contracts a waste supplier that operates with a Zero Waste to Landfill (ZWTL) policy.

The waste contractor supplies waste data reports detailing total waste volumes generated, recovery methods and recycling rates. These reports evidence that waste is diverted from landfill through reuse, recycling, or energy recovery processes.

The Carbon Trust are no longer offering ZWTL accreditation therefore, in line with the wider BBC Sustainability policy, copies of the waste reports, together with the contractor's Environmental, Social and Governance (ESG) policy and supporting documentation, are made available to productions upon request to demonstrate compliance with Zero Waste to Landfill requirements and sustainability certification schemes.

5. Waste Management Legislation

The Environment Agency provides advice and guidance on complying with legislation, their web-site can be viewed at http://www.environment-agency.gov.uk

Simpler Recycling: Workplace Recycling in England 2025

As of the 31st March 2025 the 'Simpler recycling: workplace in England' regulations were introduced. It is now a legal requriement for all businesses to separate their waste before collection, as a minimum, into:

- dry recyclable materials (plastic, metal, glass, paper and card)
- food waste
- non-recyclable waste (also called residual waste)

Businesses can receive fines for non-compliance and the Environment Agency is entitled to inspect any workplace to identify contamination, issue compliance notices and take enforcement action.

BBC Studioworks therefore endeavours to provide clear information to employees, customers and visitors about what can and cannot be recycled in each bin.

Environmental Protection Act (EPA) 1990
The requirements of the EPA cover the management of waste disposal. The Waste Management Licensing Regulations 1994 were made under the EPA. With the introduction of the "duty of care" being the most significant aspect of the EPA as far as the waste producer is concerned in that:

- Different waste types must be segregated and identified. Unsegregated waste invariably ends up on landfill sites, costing money as it has little value to the recycling industry.
- A transfer note, provided by the Waste Disposal Company, must be kept as a record of the movement of waste. This must be retained for a minimum of 2 years.
- Only registered carriers of waste can collect the waste. Under the duty of care the BBC Studioworks is liable if any waste is fly-tipped or otherwise disposed of incorrectly, even if the fly-tipping was done by the carriers or disposal company.

The Duty is designed to be a self-regulating system based on common sense management of waste and good business practice. It is the responsibility of the organisation discarding waste to make an assessment of each item and to segregate and dispose of it safely.

The EPA also has a Code of Practice on Litter and Refuse collection. External areas should be maintained free from litter and debris to the standards required within the EPA.

The Controlled Waste Regulations 2012 SI 811 (revokes the 1992 regulations)
The main changes relate to the classification of waste as household, industrial or commercial waste, and lists the types of waste for which local authorities may make a charge for collection and disposal. These Regulations classify waste according to its origins.

Clinical waste is defined as:
a) "Any waste which consists of human or animal tissue, blood or other body fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, or syringes, needles or other sharp instruments, being waste which unless rendered safe may prove hazardous to any person coming into contact with it"

and

b) "Any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood or transfusion, being waste which may cause infection to any person coming into contact with it.''

The Producer Responsibility for Packaging Waste Regulations 1997
These Regulations give organisations at different parts of the packaging chain, obligations for recycling and recovering their packaging. All cardboard packaging received by BBC Studioworks is recycled.

The Hazardous Waste (England and Wales) (Amendment) Regulations 2009
All hazardous wastes must be disposed of through a registered waste carrier who can demonstrate their registration and compliance. It is the responsibility of the producer (BBC Studioworks) to audit waste carriers to ensure this compliance from time to time.

While much waste can be identified by labelling, a definition is: *"Hazardous Waste is any waste which contains a hazardous substance in such a quantity liable to cause death, injury or impairment to living beings, pollution of waters, or unacceptable impact on the environment, if improperly handled, treated, or disposed of".*

If in any doubt over the management of Hazardous Waste on site you should contact Production Support for further advice.

Waste Electrical & Electronic Equipment Directive 2007

The E.U. Directive on Waste Electrical & Electronic Equipment lays down measures which aim to reuse, recycle and recover such wastes so as to reduce the disposal of waste.

BBC Studioworks reuses, repurposes and repairs any electrical/electronic equipment wherever possible. If such equipment requires to be diposed of it is done so by an approved waste contractor.

BBC Studioworks' disposal of WEEE waste also complies with **The Waste Electrical and Electronic Equipment Regulations 2013**

The Landfill Directive 2007

This directive requires all non-hazardous waste to be treated before being land filled. This is defined by using a 'three-point test'. All three criteria must be satisfied for all of the waste to have been treated: 1) It must be physical, thermal, chemical or biological process including sorting; 2) It must change the characteristics of the waste; 3) It must do so in order to: (a) reduce its volume; or (b) reduce its hazardous nature; or (c) facilitate its handling; or (d) enhance its recovery.

Batteries an Accumulators Directive 2008

The directive divides batteries into three categories: industrial, automotive and portable (consumer). EU Member States must achieve minimum collection rates for portable batteries of 25% by 2012 and 45% by 2016. Easily accessible collection points must be available to consumers within two years of the directive coming into force (i.e. mid 2008). Distributors will have to take back the waste batteries at no extra cost to the consumer, and must inform the consumer that this service is available. Producers of industrial and vehicle batteries must also take back waste batteries free of charge.

End of Waste Regulations

The European Commission (EC) has adopted three End of Waste regulations:

- Scrap iron, steel and aluminium
- Glass Cullet
- Copper Scrap

For these materials to cease to be waste the following applies:

- a specified quality criteria must be achieved and a producer or importer must be able to issue a statement of conformity

- a certified quality management system must be in place which can demonstrate compliance with the quality criteria

6. Implementation of the Waste Policy

Implementation
Several recycling waste streams have been implemented at Elstree Studios and this service is provided by the Landlord. The key to successful recycling and reduction in landfill is to collect at source and segregate. A number of contracts with waste management and recycling firms have been established in order to provide the means to implement the waste policy.

The following items are currently recycled:
All paper products (with the exception of confidential waste)
Appliances (Dishwashers, Washing machines, Microwaves)
Cardboard
Media waste – CD's; DVD's; floppy discs; videos; audio cassettes
Plastic bottles, packaging, cups, food containers and all metal cans
Glass
Batteries
Food
Fridges (Hazardous Waste)
Furniture
Printer Toner Cartridges (Laser Jet & Ink Jet)
WEEE – waste electrical & electronic equipment

Reusable cups and water bottles
In accordance with the BBC Studioworks Sustainability Policy, staff and production teams are encouraged to minimise single-use waste by bringing and using their own reusable bottles and drinking cups while on site.
This measure supports waste reduction objectives, reduces reliance on disposable catering items, and contributes to the facility's overall environmental performance targets.

Studio Productions
As standard, the landlord at Elstree Studios provides the following waste streams for offices and other serviced commnual areas such as kitchens and toilets:

- General Waste
- Dry Mixed Recycling
- Food Waste

BBC Studioworks also provides and manages the following waste streams:

- Confidential Waste
- Battery recycling

Other waste streams can be provided upon request.

Production companies who hire the studio facilities are responsible for managing their own production waste. BBC Studioworks will encourage any production to adhere to the policies and initiatives described in this document.

Purchasing
The purchasing function has a real impact on the quantity and recyclable value of waste. Choosing and buying recycled products is part of an overall waste strategy. As source reduction is an issue that often gets overlooked the Purchasing Department consider the following activities as part of its function:

- To cut down on over-packaged products - is packaging reusable?
- To purchase refillable or reusable products e.g. printer or toner cartridges
- To use or lease equipment that has waste reduction features e.g. photocopiers, email etc.
- To use durable items where relevant, not one-trip disposable items
- To buy equipment that can easily be mended or has interchangeable parts
- To specify/buy items made with recycled materials
- To check stationery supplier catalogues for recycled items
- To consider using cost savings from waste reduction activities, e.g. photocopiers set to double-sided, to pay for activities that may cost a little more until economies of scale come in to play.
- To investigate the options for centralised purchasing between organisations. Bulk buying cuts costs and gives more negotiating power with the supplier.

These examples are by no means comprehensive but, in general, when buying materials the Purchasing Department should consider if the product is reusable and has been or can be recycled.

7. Procedures for Recycling and Disposal

Confidential paper
Secure confidential paper bins can be provided at Elstree Studios upon request. The bins will be emptied, the bags removed sealed and the paper will then be stored securely in a specific secure collection bin, until it is collected and destroyed off site.

Non-confidential waste paper, magazines, journals, etc.
This should be placed in one of the many recycling bins around the offices. These will be emptied regualrly and transferred to larger recycling bins located througout the site.

Cardboard
Small amounts of cardboard should be flattened and placed into the large dry mixed recycling bins, located throughout the site.
For large amounts of cardboard, a separate cardboard waste stream/paladin should be requested.

Cans, Plastic Bottles\Wrapping and Cups
To reduce the amount of container waste we recommend production provide ceramic crockery, plates and metal knives, forks and spoons for kitchen areas. If this isn't feasible, compostable alternatives should be used wherever possible.
There are designated bins for mixed recyclable container disposal throughout the building. Please note that glass must not be put in any office or kitchen bins.

Glass (incl. glass bottles)
Glass bottles should be placed in the dry mixed recycling bins placed across the site.
If you break glass and cannot handle it safely, call Facilities Management for assistance.

Compostable products
Compostable cups, lids and stirrers are supplied to productions through the runners' service.
These products may also be placed in the general waste stream, as they are designed to break down through controlled decomposition processes rather than recycling.
Compostable products must not be disposed of in recycling bins, as they are not recyclable and may contaminate recyclable materials.

Wood & Metal
Productions are responsible for the safe collection and disposal of programme related waste such as sets and props.

Toner Cartridges
Printer inkjet and toner cartridges are recyclable. Please put the old toner catridges inside the cardboard box from the replacement unit and return to the supplier.

Food Waste
Food waste must always be placed in the food specific caddy bins where provided in kitchen areas. The bins are then emptied by cleaning staff and waste food transferred to larger specific food waste bins, located throughout the site.

Furniture
The policy is to repair wherever possible. Recycle end of life FEEE and purchase 2nd hand where the required specification can be met.

Non-recyclable office waste
General waste bins are provided across the site but there should be very little waste from offices that is not recyclable.

8. Hazardous Waste

Clinical Waste
For any clinical waste please contact Production Support so it can be collected by an approved waste disposal contractor. Productions should arrange their own safe disposal of any clinical waste

Batteries
Batteries should be disposed of in their own specifc waste stream as they pose a fire risk when mixed with other waste streams. Care must be taken when transporting and storing batteries that they cannot be shorted out by contact of one battery's terminals with another or by metal conductors.

Chemicals
Prior to collection, any chemicals must be stored in a dedicated COSHH storage unit and diposed of by a registered hazardous waste supplier.

Fluorescent Tubes & Sodium Lamps
Spent tubes must be stored in suitable storage coffin and collected by a registered waste carrier, who provides transportation and storage of tubes for safe disposal as hazardous waste.

Waste Electrical and Electronic Equipment
The intention of the Waste Electrical and Electronic Equipment (WEEE) Directive is to ensure manufacturer and importer compliance in the treatment of waste, whilst encouraging reuse and recycling. However the majority of IT equipment is supplied through dealerships, as an outcome this transfers some of the responsibility to the dealer, but primarily compliance rests with the product consumer (in much the same way as the disposal of a redundant fridge is the responsibility of the user).
This is especially true for hazardous waste, where regulations state that an Environmental Agency approved Facilitator should be used if over 200Kg of Hazardous waste is produced, in terms of IT equipment for example non-functional CRT monitors are now defined as hazardous waste. Normally the ionised radiation is prevented from leakage by the leaded screen, however this cannot be guaranteed in a failed unit, thus CRT monitors are now deemed to be hazardous waste.

BBC Studioworks ensures that equipment is disposed of via a licensed Authorised Treatment Facilitator.

Asbestos
Any asbestos waste, or other material waste presumed to contain asbestos, will be disposed of by authorised contractors in accordance with the requirements of the Control of Asbestos Regulations 2012 (CAR2012). The disposal process will be fully documented. Copies of completed Hazardous Waste Consignment Notes received back will be provided to the asbestos supervising officer for the asbestos register and held for 3 years.

9. External Waste

Construction Waste
Contractors' capability to dispose of waste in accordance with the duty of care expected by BBC Studioworks is assessed as part of the procurement process.

Building entrance litter and cigarette bins (designated smoking areas only)
Entrances and cigarette bins are cleaned and managed by the landlord. If you wish to report a problem, contact Production Support.

Litter picking and external litterbins
Productions should manage their teams to ensure they use the bins provided and not leave litter or waste anywhere on site, including the external area. If you wish to report a problem, please contact Production Support.

Bagged Waste/Recycling
It is important that the correct waste goes into the appropriate sacks to ensure all recyclables are segregated.

10. General Safety Precautions

Please note that much of the waste collected at Elstree Studios by the cleaners is lifted manually to waste and recycling receptacles. Please ensure that individual sacks for collection are not overfilled. 13 Kg's should be the maximum weight per bag. General guidance states 'if it is too heavy for you, it is too heavy for the cleaners'.

All bags, containers and boxes must not be filled more than three quarters full to enable safe handling, to prevent excessive weight and to avoid splitting the containers.

All clinical waste bags, sharps containers or boxes containing glass must be securely fastened before removal and marked to indicate the content. Filled sharps containers or boxes containing glass must never be subsequently placed into any other waste bag or container before disposal.

Staff must never use their hands (with or without gloves) to pick out rubbish from within a rubbish bin and rather remove the bag in its entirity, even if not completely full, and replace with new. PPE provision for the cleaners constitutes protective gloves and tabards.

Bags must be inspected by staff for adequate sealing and for no sharps protruding before handling. Staff must handle bags by the neck of the bag and keep the bags clear of the body to minimise risk of sharps injury. If this is not possible to do, and staff have to hold the base of the bag, extra care must be taken to examine the bag for sharps before doing so.
Bring to the attention of your supervisor any bag that is hazardous because of sharps protruding, excessive weight or with visible contamination on the external surface.

11. Procedures for ongoing monitoring and updating

It is the responsibility of BBC Studioworks Estate Management, to ensure that changes in legislation in relation to waste and its derivatives are adhered to and that all affected operations within BBC Studioworks remit are advised accordingly.

Regular communication between relevant parties is essential and links will be maintained with relevant staff, particularly those mentioned within this document.

These procedures will be updated and re-issued as required, with a formal regular review in line with all health and safety policies.