Port Waste Management Plan

Port of Leith

Forth Ports Limited



CONTROLLED COPY NUMBER: 03

Approved by the MCA on the 3rd December 2018

October 2018

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1.1 General Introduction and Background

It is widely recognised within the international community of maritime states that, in order to leave no excuse for ships to resort to the unacceptable practice of discharging their waste at sea, there must be a properly planned system of reception facilities in ports, which are easy to use and cost-effective. This is one of the requirements of the International Convention on the Prevention of Pollution by Ships (MARPOL 1973/78).

1.2 The Port of Leith

Forth Ports Limited are the Statutory Harbour Authority for the Firth of Forth extending from approximately one mile west of the Isle of May to Stirling. The Port of Leith is owned and operated by Forth Ports Limited which also own and operate the ports of Rosyth, Grangemouth, Kirkcaldy, Burntisland & Methil in the Forth Estuary, as well as Tilbury and Dundee.

The Port of Leith is situated on the South Shore of the River Forth, in Edinburgh, Scotland. The City of Edinburgh adjoins the Dock Estate to the South. There is a mainline rail connection into the dock.

The Port of Leith comprises of 150 land hectares and 108 water hectares. It is entered from seaward via an entrance lock 259 metres long and handles vessels of up to 45,000 DWT of various types including: Cruise, Naval, North Sea Oil related and a range of General Cargo vessels.

All the berths in the port are common user with no stand-alone terminal operator with the exception of the Imperial Dry Dock which is operated by Dales Marine. Appendix 5 shows a diagram of the ports outlining the berthing areas covered by the plan. Main commodities handled at the port include forest products, North Sea Oil related cargoes and a wide range of dry bulk materials such as grain, cement, coal, animal feeds, fertilisers, aggregates and ores. In the past there have been a number of lay up vessels that have utilised the port waste management facilities.

Ship's Masters are required to immediately notify the Harbour Office (VHF CH 12) of any involuntary discharge of oil, oil based products and any hazardous substance into the Dock. Upon this notification the Forth Ports Oil Spill Contingency Plan, Clearwater Forth will be activated. The Port is required under the Merchant Shipping (Oil Pollution, Preparedness, Response and Co-operation Convention) Regulations SI 1056 of 1998 to prepare for and respond to pollution incidents at sea.

The Firth of Forth supports a number of nature conservation sites of both International and National importance as a waterfront habitat. Areas within the Estuary are designated as RAMSAR and Special Protection Area (SPA) sites. A number of habitats located along the coastline of the Firth of Forth are designated for their nature conservation importance under the Firth of Forth Site of Special Scientific Interest (SSSI). Within the enclosed dock system at Leith there is a SPA at the entrance to the Imperial Dock (Common Tern Colony).

As the Port of Leith operates in or near these conservation sites, the port must ensure the highest degree of protection to the environment. Furthermore, any operations that could have adverse effects on conservation should be minimised as far as practically possible.

This can be achieved by provision of suitable ship shore waste reception facilities with fair pricing, to encourage disposal of waste at the port.

1.3 Purpose of the Waste Management Plan

The primary purpose is to encourage the regular disposal of vessel-generated wastes in an environmentally sustainable and legally correct manner. It is also the aim, to tailor and improve existing port waste facilities by streamlining and analysing them, to the requirements of the users, through regular consultation and dialogue.

The plan advises ship's personnel of the arrangements in place within the Port of Leith for the disposal of ship's waste in accordance with the relevant MARPOL Annexes.

The Plan also defines procedures that will ensure that waste reception facilities are adequate to meet the needs of ships normally using the port without causing undue delay.

1.4 Scope of the Plan

The Plan relates to the Port of Leith Enclosed Dock System. Tenants are responsible for administration of their own waste management plans for their facilities in accordance with the requirements of the Regulations. However, vessels servicing their premises come within the scope of the Leith Plan.

1.5 Plan Revision

Following formal approval of this plan by the MCA, updates to it will be considered as a result of periodic review and regular monitoring. Should any proposals for change be considered necessary, the consultation process will continue to apply before any such changes are implemented.

This Plan has an approved lifespan of 3 years from the date of approval by the MCA and it will be submitted in its entirety for re-approval after that time or if any major changes in the port are likely to affect the volumes or types of waste received.

Approval of plan revision is the responsibility of the Senior Harbour Master.

All revisions will first be submitted to the MCA for their formal approval before being incorporated into the Manual. Once approved, revision update(s) will be forwarded to all Plan holders as notated in the distribution list of this plan.

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REVISION HISTORY

| Date | Section | Page (s) | Brief Details | Amended By |
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2 The need for waste reception facilities

When vessels arrive in the Port of Leith, they will have been at sea for a period of time. Much of the traffic is of European origin but some vessels come from much further a field. As the Port of Leith develops the types of vessels calling change. The tables 1-3 below represent the change in the vessel type and change in volumes of waste handled over the period 2011 - 2017 (inclusive).

The Port of Leith must provide adequate reception facilities for vessels calling as a legislative requirement. However, waste reception facilities are important to discourage vessels from dumping waste overboard while at sea. The practice of disposing of waste in such an uncontrolled manner is no longer an acceptable practice. Large volumes of waste have been disposed of in this way in the past, and as a result our seas and wildlife have suffered.

2.1 A detailed description of the procedures for the reception and collection of prescribed wastes

Twenty four hours before arrival in port or no later than the time of departure from the previous port (if the sailing is less than 24 hours), the pre-arrival-CERS workbook should be sent to FTNS and the MCA containing details of all waste on board and what will be disposed of when in port. These details are retained by the MCA.

When a vessel is due to arrive at the Port of Leith, the Operations Department is notified. The Operations Department ensures there are skips placed on the berth the ship is expected to arrive at. Where two vessels are berthed next to each other, they may be expected to share the facilities. If a vessel fills a skip, further skips can be requested from the Operations Department by contacting the Port Office and/ or Operations Manager. The Operations Department will then ensure that the full skips are removed to the skip pound, and are replaced by empty skips.

Only wastes falling into the category of 'International Food Waste' or 'general waste' (e.g. office waste, paper etc) are covered by this plan, all other wastes must be removed via a port approved licensed waste contractor. Such wastes could be (but are not restricted to): oils, oily rags/materials, oily mixtures, contaminated materials, paints, paint pots, chemicals, asbestos, cargo residues (e.g. dunnage), scrap, clinical/medical waste, batteries, sewage

A list of approved contractors can be found in Appendix 2. These will change over time; up to date lists can be obtained from the Forth Ports purchasing department in Grangemouth. It is the responsibility of the Master (perhaps via the agent) to ensure that the waste contractor has the appropriate licence to handle the waste they are contracted to remove.

2.2 A description of the charging system

All vessels entering the Port of Leith will be charged a flat rate nominal fee (£95 in 2018)¹ to cover use of waste reception facilities, regardless of whether or not they use the provided facilities. In line with the legislation, this is to encourage vessels to place their waste in the provided facilities and to discourage vessels throwing waste over the side while at sea or in port.

All lay-up vessels will be charged as stipulated in the port's schedule of charges, or as agreed (unless they organise their own waste facilities whilst in-port).

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¹ Note this is the charge at the time of writing, this is subject to change and is expected to increase at least annually with changes to the landfill tax regime and contractor charges.

These charges have been set following the government guidance to charge a minimum of 30% of the costs the port incurs in the disposal of waste. To arrive at this number, the total volumes of waste removed (and subsequent cost), travel, taxes, disinfecting, skip hire costs and management time over the previous years were totalled, and divided by the number of calling vessels. This figure was then used to derive the charge.

The scale of charges is notified in the Port of Leith Port Charges Booklet` which is published annually and issued to all port users. Following any interim re-assessment of the charges with changes to the landfill tax regime and contractor charges as noted above, port users are advised by letter on an individual basis via their agents.

2.3 Procedures for reporting inadequacies

The Master of a **UK Flagged** ship faced with a lack of reception facilities in the Port of Leith should bring the alleged inadequacy to the attention of the Port Manager and/or the Operations Manager immediately.

If the problem is not resolved at the time to the Masters satisfaction then the form at <u>Annex D</u> should be completed by the Master, ship-owner or agent and emailed to the MCA at the following address:

PWR Inadequacies Environmental Policy Branch Maritime and Coastguard Agency, Spring Place, 150 Commercial Road Southampton, SO15 1EG

Email: environment@mcga.gov.uk

Where possible, the Master of a **foreign flagged** ship faced with a lack of reception facilities should bring the alleged inadequacy to the attention of the harbour or terminal concerned immediately. If the problem is not resolved at the time to the Masters satisfaction then the ship should contact their own flag, who should take appropriate action through the IMO.

Further details may be obtained from the MCA website http://www.mcga.gov.uk (reference MGN 563, section 19)

All complaints received by Forth Ports Limited will be forwarded to the Group Health, Safety & Environmental Manager. In the medium term, the Group Health, Safety & Environmental Manager will consider what corrective actions are necessary to prevent this type of complaint from occurring again and if any revisions are required to the Waste Management Plan are required.

The MCA will investigate the Master's report and where, in its opinion the allegation of inadequate facilities is justified it will take the matter up directly with the Port and also notify the European Commission.

If the Port fails to comply with the Regulations, it shall be guilty of an offence and liable on summary conviction to a fine.

2.4 Consultation procedures

The Port of Leith communicates with key stakeholders on a regular basis and any changes to the waste management plan will be highlighted in broad terms, as and when required.

A letter has previously been sent to all agents from the Chief Operations Officer relating to the setting of the waste management tariff. Copies of this letter can be obtained from the Port Office, if required.

2.5 Type and quantities of all wastes received and handled

The figures in table 1 have been used to estimate changes in waste volumes over coming years.

Table 1: Number of vessels calling at Leith

| 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 |
|------|------|------|------|------|------|------|
| 571 | 597 | 456 | 481 | 408 | 361 | 342 |

Over this period, Table 2 illustrates the volumes of waste removed from the Port of Leith from vessels using our facilities.

Table 2: Volumes and types of Waste at Leith

| Year | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 |
|---------------------------------|------|------|------|------|------|------|-------------|
| Covered Waste -'Food' (m³) | 118 | 112 | 83 | 105 | 84 | 33 | Data |
| General Waste (m ³) | 608 | 704 | 461 | 554 | 250 | 258 | unavailable |
| Total (m ³) | 726 | 816 | 544 | 659 | 334 | 291 | |

This information has been used to estimate what trends in shipping, and therefore what changes to the waste will be received over the next few years, allowing the port to plan its waste facilities to cater for the needs of visiting vessels. Table 1 shows that the maximum number of vessel calls in any year was 597, the least was 342. It is expected that the number of vessel types and calls should remain broadly the same as the past few years. On the basis of the last 3 years the data presented above shows that, the average vessel disposes of just under one tonne of waste each call. It is envisaged that over the following years, assuming 400 vessels call at the port per year, there will be approximately 300t of waste which will be received by the Port of Leith facilities.

The past four years has shown a steady decline in the total number of ships calling at Leith. Although the number of cruise ships has increased, it is considered that the existing waste management capacity is more than appropriate for the Port of Leith over the coming years. This will be revised if there are any substantive changes in the vessel types and/or numbers.

2.6 Description of the type and capacity of waste reception facilities

The Port of Leith provides skips for vessels on arrival. In the conventional port the skips are held in a compound at the West end of the Edinburgh Dock and delivered to the quayside for use by vessels. When full they are returned to the compound and emptied by the contracted waste

management company on a regular basis. At the Cruise Liner berth the skips are situated close to the terminal building and if required will be placed in the vicinity of the vessel's garbage discharge opening.

There are two types of skip, those for international food waste (covered skips marked 'food waste') and open skips for general wastes – not food waste, 'special' or 'hazardous' wastes.

Table 3 illustrates the number of skips by type, and therefore the total port capacity. If required, additional skips will be provided.

Table 3: Skip types and port waste reception capacity

| Waste Type | Number of Skips | Skip capacity (m³) | Port Capacity (m³) |
|---------------|--|--------------------|--------------------|
| International | 18 (Conventional Port, | 8 | 144 |
| Food waste | Cruise Liner Terminal & Ocean Terminal | | |
| General waste | 12 (Conventional Port, | 8 | 96 |
| | Cruise Liner Berth & Ocean Terminal) | | |
| Totals | 30 | | 240 |

^{*} These totals cover the Cruise season

There is the capacity for ten individual vessels to each have a food skip in the conventional port. In reality, these would be shared where vessels shared a berth, and therefore, there is the capacity for 10 berths to have food waste facilities. It is unusual for six berths to be occupied at any one time. Note, if a large Naval visit is expected at the port, extra skips may be ordered prior to arrival to ensure that the ships do not impact upon the port capacity. During the cruise season the majority of waste landed at the Cruise Liner Berth is food waste. Therefore the majority of skips located in this vicinity are for International Food Waste.

3 Legislation, Roles and Responsibilities in the Port of Leith

Since January 1998, UK legislation has required Ports to implement MCA approved waste management plans, Directive 2000/59/EC of the European Parliament and of the Council on port waste reception facilities for ship generated waste and cargo residues took the matter a stage further. The Directive requirements are now implemented in the UK through the Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003 (S.I. 2003/No 1809).

Since July 2003, these 2003 Regulations revoke the Merchant Shipping (Port Waste Reception Facilities) Regulations 1997 along with the associated guidance documents. These have been further updated with regards international food stuffs through the Animal By-Products (Scotland) Regulations 2003.

This plan has been prepared in accordance with the latest guidance for ports, given in Marine Guidance Note 563 which includes Annex E "Port Waste Management Planning – A Guide to Good Practice". This is issued by the Maritime and Coastguard Agency (MCA), who are responsible for applying the Regulations to all Harbours and Ports in the U.K.

The Plan will be submitted for approval to the MCA, as the competent National Authority, verifying that it is in compliance with the requirements of the Regulations.

In accordance with the Freedom of Information (Scotland) Act 2002, copies of the plan can be made available to the public on request.

3.1 Identification of responsible parties

- The Port Manager Leith, Rosyth and Burntisland is in overall charge of the operation of the
 ports and co-ordinates the different parties in the execution of their duties in the plan in these
 ports.
- The Harbour Master administers the plan and ensures that ship Agents are kept advised of any changes to the list of approved waste contractors in the Port, though such a letter would usually be sent from the port office via the secretary. The Harbour Master is also responsible for ensuring that port waste infringement reports are made to the MCA as required by the legislation.
- The responsibility for the commercial aspect of the contract with a licensed waste contractor for the reception facilities from ships is with the procurement department. They will undertake the pre-vendor assessment to approve waste contractors as well as monitoring contract compliance and ensuring the contractors have valid registration and accreditation as detailed in the management of contractors procedure.
- The Operations Manager is responsible for ensuring that any difficulties that arise in compliance with this Plan are resolved to the satisfaction of all concerned and that skips are emptied and/or delivered by liaison with the procurement department.
- **Group Health, Safety & Environment Manager** is responsible for investigating complaints and assessing requests for a charge reduction relating to environmentally friendly ships.
- The Health and Safety Field Officer is responsible for ensuring that operations are undertaken in line with company policy and risk assessments.
- The Senior Purchasing Manager is responsible for ensuring that the approved contractor complies with the contract and also maintains the list of approved suppliers

3.2 Description of pre-treatment (if any)

Separation of waste by vessels into food waste and general waste.

3.3 Description of methods used in monitoring the actual use of the facilities

At any time, any employee of the port or the waste contracting firm may inspect the content of the skip. If any substances have been disposed of in the wrong designated skip, the vessel will be charged the full costs of disposal via an appropriate contractor with a subsequent administration charge. This will also apply for vessels leaving materials on the quayside.

3.4 Description of methods of recording amounts of prescribed wastes received

On removal of the skips from site by the waste contractor, the Purchasing Department, collate the information for reconciliation against invoicing. The original (white copy) of the WTN's are forwarded to accounts and are filed with the monthly invoice.

3.5 Description of how the prescribed wastes are disposed of

All wastes placed in the Contracted Waste Skips will be removed when full or as required on a regular basis. The contracted waste management company removes the covered international food waste skips from site. They are then treated as per the regulations and emptied in an approved landfill and subsequently disinfected using an approved disinfectant. A cleaned, empty skip is replaced in the skip compound. Non-international food waste skips are removed from the berth and

held in the skip compound. The waste contractor will then remove the contents from site. The empty skip is returned to the designated skip compound.

4 Information for the ships and/or agents

Letters have been sent to all Agents currently acting for vessels at the Port of Leith notifying them of the waste reception facility requirements, as applicable to the Port. The first of these letters was sent in 2004. Agents have also been given copies of this plan as part of the consultation process.

An example letter can be found below:

Dear Sir,

Re: Port Waste Management - Leith

Introduction

As you will be aware there have been a number of changes to European and British legislation relating to ship generated waste over the last few years. The waters around our ports in the Forth and Tay estuaries are protected under international conservation designations. These, and a number of other international conventions highlight the unacceptability of the once common practice of throwing waste overboard. It is therefore in the interest of ships to utilise the waste reception facilities provided at our ports to ensure our local environment is not polluted with ship generated wastes.

Should the Port be faced with a vessel that has not complied with the need to notify and/or offload waste, it is under an obligation to notify the MCA. Such vessels may then be targeted by the MCA for inspection and destination ports/terminals will be warned of their non-compliance. Vessels that fail to comply with the requirements shall be guilty of an offence and liable on summary conviction to a fine.

The Waste Reception Process

Twenty four hours before arrival in port or no later than the time of departure from the previous port (if the sailing is less than 24 hours). The pre-arrival CERS workbook should be sent to FTNS and the MCA containing details of all waste on board and what will be disposed of when in port.

Obviously there are many different types of waste, and these need to be handled is specific ways and placed is specific locations. These details are outlined below.

As is currently the case, prior to arrival of a vessel on a berth in Leith, the Operations Department will ensure that there are skips on the berth in question. This may not be immediately adjacent to the ship, these will be placed in a safe location, whilst remaining as convenient for the ship as possible. If for some reason there is no skip present, one can be requested from the Operations Department or via the Console Controller in the Harbour Office (contact details below). This is also the route for requesting full skips to be replaced with empty skips. Do not overfill the skips or place excess rubbish either adjacent to or beside skips. If this occurs the vessel will be charged the full clear up costs with an administrative cost. Similarly, if vessels place waste in the wrong skips, full costs will be passed on.

All international food wastes (any wastes from a vessel that has previously entered a port outwith the UK) must be placed in the enclosed food waste skips provided. Non-food wastes (e.g. metals, paper etc.) should not be placed in these skips.

Other general wastes (office waste, paper etc.) should be placed in the other skips provided (the non-food skips).

Special, hazardous or other waste of a sensitive nature must be removed using an approved licenced contractor, organised either by the Agent or directly via the Master. It is the responsibility of the Master (perhaps through the agent) to ensure that any contractor used has a licence to handle the waste concerned. If there are any uncertainties relating to waste disposal, queries should be addressed to SEPA².

Lists of various waste types are attached at **Appendix 1**.

A list of the currently approved contractors can be found in **Appendix 2** along with the appropriate port contact points. The approved contractors list will change on a regular basis and up to date lists can be obtained from the purchasing department, Forth Ports, Grangemouth.

Exemptions

A limited number of vessels on regular routes, disposing of their waste at particular ports on their cycle can apply to the MCA for an exemption. In such cases, copies of the exemption certificate should be sent to FTNS prior to arrival in the port. Certificates will not be accepted retrospectively.

Complaints

The Master of a **UK Flagged** ship faced with a lack of reception facilities in the Port of Leith should bring the alleged inadequacy to the attention of the Port Manager and/or the Operations Manager immediately.

If the problem is not resolved at the time to the Masters satisfaction then the form at <u>Annex D</u> should be completed by the Master, ship-owner or agent and sent to the MCA as per section 2.3 of this plan.

Where possible, the Master of a **foreign flagged** ship faced with a lack of reception facilities should bring the alleged inadequacy to the attention of the harbour or terminal concerned immediately. If the problem is not resolved at the time to the Masters satisfaction then the ship should contact their own flag, who should take appropriate action through the IMO.

The port is obliged to take action to correct the situation by whatever means he considers necessary. All complaints received by Forth Ports Limited will be forwarded to the Group Health, Safety & Environmental Manager. In the medium term, the Group Health, Safety & Environmental Manager will consider what corrective actions are necessary to prevent this type of complaint from occurring again and if any revisions are required to the Waste Management Plan are required.

The MCA will investigate the Master's report and where, in its opinion the allegation of inadequate facilities is justified it will take the matter up directly with the Port and also notify the European Commission.

Charging

Charge for Forth Ports Limited Waste Reception Facilities: Each vessel call - £95 Lay-up vessels - £10 per week

NB: These charges are for the disposal of reasonable quantities of waste only.

² Scottish Environment Protection Agency, Strathallan House, Castle Business Park, Stirling, FK9 4TZ, Tel: 01786 452595 or Fax: 01698 738155.

These charges have been calculated on the basis of average levels of waste received from each vessel over the last three years and the associated costs incurred by the ports to ensure, in line with Government guidance, that the ship pays a significant charge of at least 30% of the total disposal cost.

Yours sincerely

Port Manager

Appendix 1: Glossary and types of waste

Asbestos All asbestos containing materials as defined in the 2010 SI 2984 Merchant Shipping Regulations. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Batteries Vehicle or electronic batteries containing toxic materials excluded from land fill waste sites. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Chemicals Unidentified drums or containers containing chemical substances are to be automatically treated as hazardous waste this also applies to chemical spills. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Clinical / Medical waste Normally waste associated with minor medical procedures. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Contaminated waste Waste that includes oil-based products, paints and waste generated as a result of maintenance or any other waste that could be considered as 'contaminated', 'special' or 'hazardous' under UK regulations and laws. **(Vessel or agent to organise uplift through Forth Ports approved contractor)**

Dunnage from cargo operation originating out with the UK will be removed by skip for incineration. **(Vessel or agent to organise uplift through Forth Ports approved contractor)**

Explosives (flares etc.) (Vessel or agent to organise uplift through Forth Ports approved contractor)

Garbage Means all kinds of victual, domestic and operational waste, generated during the normal operation of galleys (**EXCLUDING International Food Waste**).

General waste Means all waste, which is generated during the offloading of ships, which includes paper, plastics, and wood but excluding oil.

International Food Waste All food wastes originating beyond the UK. If there is any dubiety regarding the origin for food wastes it will be treated as international.

Refrigerators All refrigerators and stand-alone Air Conditioning units are to be assumed as containing gases damaging to the environment and treated as special waste. **(Vessel or agent to organise uplift through Forth Ports approved contractor)**

Scrap Metal Off cuts of metal and scrap machinery. (Requests for reception facilities for scrap will be considered on an individual basis.)

Sewage/Black Water waste water from toilets (Vessel or agent to organise uplift through Forth Ports approved contractor)

Tyres All tyres from motor vehicle and plant are considered special waste. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Any other waste. (Vessel or agent to organise uplift through Forth Ports approved contractor)

Appendix 2: Contact details

FTNS

FTNS: +44 (0) 1324 498584 +44 (0) 1324 668480 Fax: ftns@forthports.co.uk Email:

Port of Leith

Operations Manager: 0131 555 8725 Operations Clerk: 0131 555 8765 Operations Department Fax: 0131 555 1212

0131 555 8900 & VHF Channel 12 Console Controller:

Approved Waste Contractors

Dow Waste Management limited 23 Lenziemill Road Cumbernauld G67 2RL

Tel: 01236 730730 Fax: 01236 730555 Mobile: 07530 261842

Foundry Steels Clyde Street, GRANGEMOUTH,

FK3 8EU

Fax: 01324 666342 Tel: 01324 474770

Hazco Environmental Ltd 14 Inchyra Road Grangemouth FK3 9XB

01324 665577 01324 666699 Tel: Fax:

Augean Treatment Ltd 36 Clark Street, Paisley, PA3 1RB

Tel: 0141 887 5689 Fax: 0141 887 7846

MCA – Waste Reception Facilities Complaints:

PWR Inadequacies **Environmental Policy Branch** Maritime and Coastguard Agency, Spring Place, 150 Commercial Road Southampton, SO15 1EG

Email: environment@mcga.gov.uk

Appendix 3: List of consultees

W Knight Watson Cory Brothers Denholm Wilhelmsen Agency Forth Clarkson Port Services Forth **Global Port Services** Inchcape Shipping **GAC Shipping GP** Shipping T Ward shipping Searoute Port Services Forth Estuary Towage **Dales Marine Services** Port Manager, Leith Group Health, Safety & Environmental Manager Port Engineer, Leith Operations Manager, Leith Forth & Tay Navigation Service Senior Purchasing Manager Harbour Master Forth Inner Forth Pilots Leith Boatmen MCA Port Waste Contractor

Appendix 4: Consultation Feedback

From the first round of consultation (for the 2005 plan), feedback principally related to charging. There were also comments relating to skip availability and the health and safety implications of a waste management contractor operating on the quayside.

Further feedback received from the consultation was in relation to provision of the forms in an electronic format.

The charging and availability elements are addressed through review as and when required. All drivers coming onto the berth should have been through the relevant Port of Leith induction and all agents have been issued with MS Word file versions of the Waste Management forms.

2008 Update

Shipping agents have been reminded on a number of occasions regarding the need to conform with the regulations and of Forth Ports obligation to report any infringements to the MCA.

Electronic versions of the waste reports have also been forwarded on request to shipping agents or in some cases directly to shipowners.

2012 Update

Various shipping agents advised that they received complaints from ships/masters that the port don't issue the ships with garbage receipts. Having checked this problem in the past the MCA confirmed that the required self declaration pre-arrival and pre-departure forms will act as receipts.

Comments have been made about the required about re-labelling skips to make it clearer about the required contents; but EU waste regulations require skips to be labelled in a specific manner.

2013 Update

Various shipping agents advised that they received complaints from ships/masters that the port does not have any recycling facilities. Waste Regulations are due to change in 2014, although this will not affect shipping. Present Waste Disposal Contractor has confirmed that they recycle, as far as practical, all non-food waste.

2015 Update

The plan was sent out for consultation on the 20th April with comments to be received by 6th May 2015

Various shipping agents advised that they receive complaints from ships/masters that the port does not have any recycling facilities. Forth Ports are currently in discussions with Animal Health regarding recycling, and the present Waste Disposal Contractor has confirmed that they recycle, as far as practical, all non-food waste.

Plan approved by the MCA on the 28th May 2015.

2018 Update

The plan has been updated to reflect the implementation of CERS. The ports of Kirkcaldy and Methil have been removed as these are now the responsibility of the Port of Dundee. Update to some job titles, job roles and approved waste suppliers. Section 2.3 update to reflect changes to the procedures for reporting alleged inadequacies. Section 3.3 updated to remove the mention of notification <u>prior</u> to leaving port. Appendix 5 added to show a diagram of the ports outlining the berthing areas covered by the plan. Updates to section 1.2 paragraph 4 to reference the port diagram and operation of the Imperial Dry Dock by Dales Marine.

Appendix 5: Port Berth Plan

