SCRAP MATERIALS MANAGEMENT POLICY

Mkubwa Mixed Steel and Logistics LTD

Effective Date: 23rd April 2022

Approved By

Bulega Sulaiman

General Manager

Version: 1.0

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1. Purpose

This policy establishes a comprehensive framework for the systematic management of scrap materials across all operations of Mkubwa Mixed Steel and Logistics LTD. It ensures compliance with relevant regulatory frameworks, optimizes resource recovery, and minimizes risks to health, safety, and the environment. This policy also provides technical procedures for handling, sorting, transporting, processing, and disposing of scrap materials to enhance operational efficiency and sustainability.

2. Scope

This policy applies to:

All employees, contractors, and stakeholders involved in activities that generate, handle, or process scrap materials.

All operational sites, including collection points, processing facilities, storage depots, and transportation networks managed by Mkubwa Mixed Steel and Logistics LTD.

All categories of scrap materials, including but not limited to ferrous and non-ferrous metals, plastics, hazardous waste, and e-waste.

3. Objectives

1. Regulatory Compliance: Adhere to national and international waste management regulations, including those outlined by NEMA, ISO 14001, and OSHA.
2. Sustainability: Integrate circular economy principles by maximizing recycling, reuse, and recovery of scrap materials.
3. Risk Mitigation: Implement robust systems to minimize environmental contamination, workplace hazards, and legal liabilities.
4. Operational Efficiency: Standardize processes for scrap handling to reduce waste generation and improve resource utilization.
5. Data Transparency: Maintain accurate records for auditing, reporting, and process optimization.

4. Definitions

Scrap Material: Discarded or surplus materials that retain economic or functional value and can be recycled or reused. Examples include metal scraps, plastics, and electronic components.

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Hazardous Waste: Waste that poses significant risks to human health or the environment due to its chemical, physical, or biological properties. Examples include batteries, medical waste, and chemical residues.

Non-Hazardous Waste: Waste that does not pose immediate health or environmental risks. Examples include paper, glass, and untreated plastics.

5. Responsibilities

5.1 Management

- Develop and enforce operational procedures aligned with this policy.
- Allocate resources for the safe handling, transportation, and disposal of scrap materials.
- Conduct regular training sessions on waste management best practices.

5.2 Employees

- Comply with all procedures for scrap segregation, handling, and storage.
- Report non-compliance, unsafe conditions, or incidents to supervisors.
- Participate in training programs to enhance skills in waste management.

5.3 Contractors and Vendors

- Ensure full adherence to Mkubwa Mixed Steel and Logistics LTD's waste management guidelines.
- Provide proof of certifications for handling hazardous and recyclable materials.
- Use approved transportation and disposal channels for scrap materials.

6. Policy Guidelines

6.1Scrap Material Segregation

Segregation must occur at the source of generation using labelled containers, trucks or designated areas.

Categories:

Ferrous Metals: Steel, iron.

Non-Ferrous Metals: Aluminum, copper, brass.

E-Waste: Electronics, batteries, and related components.

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Plastics: PET, HDPE, PVC.

Other Wastes: Glass, wood, or other recyclable materials.

6.2 Collection and Handling

Collection procedures must minimize cross-contamination between hazardous and non-hazardous materials.

Use appropriate tools (e.g., forklifts, magnets, or specialized containers) to ensure safe and efficient handling.

Develop schedules for regular scrap collection to prevent accumulation.

6.3 Storage

Storage areas must be equipped with impermeable surfaces and drainage systems to prevent soil or water contamination.

Hazardous Waste:

Must be stored in sealed, corrosion-resistant containers.

Clearly marked with hazard symbols and material descriptions.

Non-Hazardous Waste:

Organized into bulk containers for efficient retrieval and transport.

6.4 Transportation

Use vehicles compliant with local and international hazardous material transport regulations (e.g., ADR, IMDG Code).

All transport units must have spill containment kits and proper documentation, including manifests and Material Safety Data Sheets (MSDS).

6.5 Processing and Recycling

Establish partnerships with certified recycling facilities for processing scrap.

Adopt advanced technologies for scrap processing, such as shredders, balers, and smelters for metal scraps.

Hazardous waste processing must adhere to specific guidelines, including incineration, neutralization, or secure landfill disposal.

6.5 Disposal

Materials that cannot be recycled or reused must be disposed of at authorized facilities.

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Maintain traceability for all disposal activities to ensure compliance with environmental laws.

7. Documentation and Reporting

Maintain detailed records of:

Scrap material inventory by type, quantity, and value.

Collection, transportation, and processing activities.

Audit trails for hazardous material handling and disposal.

Submit regular reports to NEMA and other regulatory bodies, as required.

8. Health, Safety, and Environmental (HSE) Considerations

8.1 **Employee Safety**

Provide and mandate the use of appropriate PPE, including gloves, goggles, helmets, and steel-toe boots.

Regularly assess work areas for potential hazards, such as sharp edges, toxic exposure, or fire risks.

8.2 **Environmental Safeguards**

Conduct Environmental Impact Assessments (EIAs) for all major projects involving scrap material management.

Implement spill prevention and response protocols for hazardous waste.

8.3 Emergency Preparedness

Establish an emergency response team trained in spill control, fire management, and first aid.

Conduct periodic drills to evaluate and improve response readiness.

9. Performance Monitoring and Audits

Perform quarterly audits to assess compliance and identify areas for improvement.

Use Key Performance Indicators (KPIs) such as recycling rates, incident reports, and regulatory violations to measure policy effectiveness.

10. Review and Amendments

The policy will undergo a comprehensive review annually or whenever significant regulatory, operational, or technological changes occur.
Amendments will be communicated to all relevant stakeholders promptly.

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