MKUBWA MIXED STEEL
AND LOGISTICS LTD

STANDARD OPERATING PROCEDURE (SOP) FOR WASTE MANAGEMENT AND SCRAP DISPOSAL

Mkubwa Mixed Steel and Logistics LTD

Version: 1.2
Effective Date: 21st Sept 2023
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1. DOCUMENT CONTROL

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2. PURPOSE

This Standard Operating Procedure (SOP) establishes a structured, regulatory-compliant, and operationally efficient process for waste and scrap material inspection, categorization, transportation, disposal, and reporting. It ensures:

- Regulatory Compliance with National Environmental Management Authority (NEMA), Uganda National Bureau of Standards (UNBS), ISO 14001 (Environmental Management Systems), and other applicable laws.
- Operational Efficiency through proper documentation, tracking, and streamlined logistics.
- Environmental Protection by ensuring waste is handled, transported, and disposed of safely.
- Health & Safety of employees, contractors, and communities involved in the waste management process.

This SOP is mandatory for all employees, contractors, and third-party service providers handling waste, scrap, and industrial disposal materials.

3. SCOPE

This SOP applies to all waste management and scrap disposal activities undertaken by Mkubwa Mixed Steel and Logistics LTD, including:

- On-site inspection and categorization of materials.

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- Segregation and assignment to disposal or recycling facilities.
- Transportation of hazardous and non-hazardous waste.
- Issuance of regulatory documentation and compliance reports.
- Tracking of waste disposal and recycling processes.

It covers all waste types, including:

- Hazardous Waste (chemical waste, industrial sludge, expired chemicals, etc.).
- Non-Hazardous Waste (organic waste, packaging materials, textiles, etc.).
- Scrap Metals & Recyclables (iron, aluminum, plastics, e-waste, etc.).

4. ROLES AND RESPONSIBILITIES

4.1 General Manager (GM)

- Ensures regulatory compliance and adherence to company policies.
- Approves waste management contracts and environmental impact reports.
- Oversees execution of waste disposal agreements with clients.

4.2 Operations Manager

- Supervises waste handling processes from inspection to final disposal.
- Ensures proper segregation, tracking, and regulatory compliance.
- Coordinates logistics for safe and efficient waste transportation.

4.3 Waste Management Supervisors

- Conducts site inspections and categorization of waste.
- Ensures proper segregation and assignment to disposal/recycling streams.
- Maintains accurate tracking and documentation of waste movements.

4.4 Collection & Transportation Team

- Loads, transports, and delivers waste materials safely.
- Ensures all transport complies with legal and safety regulations.

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- Issues Waste Transfer Notes (WTNs) for tracking.

4.5 Environmental, Health, and Safety (EHS) Officer

- Ensures all waste processes comply with environmental and safety regulations.
- Conducts risk assessments and incident investigations.
- Approves Destruction, Disposal, and Recycling Certificates.

4.6 Documentation & Compliance Officer

- Maintains records of waste transfers, disposal, and recycling.
- Prepares and submits regulatory compliance reports.
- Ensures compliance with legal and contractual obligations.

5. WASTE MANAGEMENT PROCESS FLOW

The waste management process flow outlines the detailed, step-by-step procedures for the inspection, categorization, segregation, transportation, disposal, recycling, and reporting of waste materials. This is essential for maintaining operational efficiency and ensuring regulatory compliance, environmental safety, and worker protection throughout the entire waste management cycle employed by Mkubwa Mixed Steel and Logistics LTD.

5.1 Inspection of Materials and Waste

The first step in the waste management process is to inspect the materials and waste generated by clients. The inspection is crucial for determining the characteristics of the waste, identifying potential hazards, and ensuring that appropriate measures are taken for proper handling, transport, and disposal.

5.1.1 On-Site Inspection Protocols

- Personnel Involved: A Waste Management Supervisor (WMS) and a Health, Safety, and Environment (HSE) Officer will conduct the inspection. These individuals are trained to identify various types of waste and assess potential risks.

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- Inspection Areas: Inspect all areas where waste is generated, including production floors, storage areas, warehouses, and disposal zones.
- Criteria for Inspection:
  - Visual Inspection: Waste will be checked for physical characteristics (e.g., liquid, solid, hazardous, recyclable).
  - Chemical Testing: In cases where the waste is suspected to be chemically hazardous, testing will be conducted to identify the chemical composition (e.g., pH level, toxicity).
  - Quantity and Volume: The total weight and volume of the waste will be recorded, which is essential for proper disposal planning and transportation logistics.

5.1.2 Reporting and Documentation

After the inspection, a Waste Inspection Report is generated, documenting:

- Type of Waste: Identifying whether the material is hazardous or non-hazardous.
- Potential Risks: Analyzing environmental or health hazards associated with the waste.
- Initial Waste Categorization: Based on the inspection results, the waste is categorized for further processing.
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5.2 Waste Categorization and Description

The waste is then categorized based on its nature, toxicity, and recyclability. Accurate categorization is vital for determining the appropriate disposal or recycling method, minimizing environmental harm, and ensuring compliance with legal and regulatory standards.

5.2.1 Waste Categories

Waste is categorized into the following primary groups:

- Hazardous Waste: Waste that poses a substantial or potential threat to public health or the environment. Examples include:
  - Chemical Waste: Industrial chemicals, solvents, pesticides, paints, etc.
  - Biological Waste: Medical and pharmaceutical waste, laboratory waste.

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    - Radioactive Waste: E-waste containing radioactive materials.
    - Flammable Waste: Gasoline, oils, paints, and flammable solvents.
- Non-Hazardous Waste: Waste that does not pose a significant threat to health or the environment. Examples include:
    - Organic Waste: Food scraps, plant matter, biodegradable waste.
    - Inert Waste: Construction materials, soil, concrete, and rubble.
    - General Waste: Packaging materials, textiles, and office waste.
- Recyclable Waste: Waste that can be repurposed or processed into raw materials for new products. This includes:
    - Metals: Steel, aluminum, copper, and other scrap metals.
    - Plastics: PET bottles, plastic packaging, and other recyclable plastics.
    - E-waste: Circuit boards, batteries, and electronic components.

5.2.2 Detailed Waste Description

Each category is further described by the following characteristics:

- Composition: Detailed information about the chemical, physical, and biological makeup of the waste.
- Potential Risks: Detailed hazard identification, including health, environmental, and fire risks.
- Safe Handling Instructions: Detailed safety protocols and personal protective equipment (PPE) requirements for the handling of each type of waste.

5.2.3 Documentation

The waste categorization and description are documented in the Waste Categorization Report, which is signed by both the Waste Management Supervisor and the HSE Officer. This report forms the basis for decision-making in the subsequent steps.

5.3 Segregation and Assignment to Disposal or Recycling Destination

Once the waste has been inspected and categorized, it is segregated and assigned to the appropriate destination for disposal or recycling.

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Segregation ensures that waste types are separated in a manner that maximizes safety and efficiency, and minimizes cross-contamination.

5.3.1 Waste Segregation Protocol

- Separate Waste Streams: Waste is segregated according to its classification—hazardous, non-hazardous, and recyclable.
  - Hazardous waste will be stored in specialized containers designed for its type (e.g., sealed drums, leak-proof bins).
  - Non-hazardous waste will be placed in standard containers or designated bins.
  - Recyclable materials will be segregated into different categories such as metal, plastics, and e-waste to facilitate recycling processes.
- Color-Coded System: Waste bins and containers will be color-coded according to the type of waste they are designated to collect (e.g., red for hazardous, green for recyclables, blue for non-hazardous). This helps workers quickly identify and correctly segregate materials.
- Employee Training: All staff will be trained on proper segregation procedures to ensure compliance.

5.3.2 Assignment to Destination

- Based on the categorization, waste is assigned to either disposal facilities (for non-recyclable and hazardous waste) or recycling plants (for recyclable materials).
  - Hazardous Waste Disposal: For example, chemical waste may be assigned to a licensed hazardous waste disposal facility.
  - Non-Hazardous Waste Disposal: Non-hazardous materials such as organic waste may be assigned to a landfill or composting facility.
  - Recyclable Materials: Recyclables like scrap metals will be sent to a metal recycling plant or e-waste recycling center.

5.3.3 Documentation

A Segregation and Disposal Assignment Report is generated to document the segregation process, including details of the waste stream, the assigned destination, and the handling protocols.

5.4 Collection, Transportation, and Waste Transfer Note (WTN)

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The next step involves the collection and transportation of the segregated waste from the collection site to the designated disposal or recycling facility. Proper transportation is essential to prevent spillage, environmental contamination, and worker exposure.

5.4.1 Collection Procedures

- Vehicles Used: Waste will be collected using suitable transport vehicles equipped with leak-proof containers, GPS tracking, and spill containment measures.
- Loading Protocols: Loading will be done using mechanical equipment (e.g., forklifts, cranes) to prevent manual handling, which reduces the risk of injury or contamination.

5.4.2 Waste Transfer Documentation

- Waste Transfer Notes (WTN): Before transportation begins, a Waste Transfer Note (WTN) is issued. This document includes:
  - Waste type and quantity
  - Waste generator information (e.g., client name, location)
  - Transporter details (e.g., vehicle registration, driver details)
  - Disposal facility or recycling center information
- Purpose: The WTN ensures traceability of waste from its source to its final disposal or recycling location, as mandated by NEMA and ISO 14001.

5.4.3 Transport Safety Measures

- Vehicle Inspections: Vehicles must undergo daily safety checks before transporting waste to ensure compliance with transport regulations.
- Route Planning: A journey management plan (JMP) is developed, detailing the safest and most efficient routes for waste transportation. Factors such as road conditions, traffic, and proximity to emergency services are considered.
- Emergency Procedures: Emergency protocols are in place for accidents, including spill response, first aid, and emergency contacts.

5.5 Destruction, Disposal, and Recycling Certification

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Once the waste reaches its final destination—either a disposal facility or a recycling center—a destruction, disposal, or recycling certificate is issued to the transporter in the name of the waste generator.

5.5.1 Destruction and Disposal

For hazardous waste, the facility will issue a Destruction Certificate confirming that the material has been safely destroyed in accordance with regulatory guidelines (e.g., incineration of chemical waste). For non-hazardous waste, a Disposal Certificate will be issued to confirm that the waste has been properly disposed of in a sanctioned facility.

5.5.2 Recycling Certification

When waste is successfully recycled, a Recycling Certificate is issued, which includes:

- Details of the recycling process (e.g., metals melted down for reuse, plastics processed into new products).
- Quantity of materials recycled.

5.6 Waste Management Reporting

The final step involves the generation of Waste Management Reports. These reports provide a comprehensive overview of the waste management activities, ensuring transparency, compliance, and continuous improvement in operations.

5.6.1 Reporting Frequency

Reports are issued based on the frequency of collections (e.g., weekly, monthly) or quantity of waste managed. These can include:

- Monthly Waste Reports: For clients with frequent waste collections.
- Quarterly Reports: For larger waste volumes or quarterly waste audits.

5.6.2 Report Content

Reports include:

- Waste Breakdown: Type, quantity, and categorization of waste.

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- Disposal Methods: Destination and method of waste disposal (e.g., landfill, incineration, recycling).
- Compliance Audits: A review of compliance with **legal and environmental regulations.
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6. TRANSPORTATION AND JOURNEY MANAGEMENT PLAN

The Transportation and Journey Management Plan (JMP) is a critical component of the waste management process, ensuring the safe, efficient, and compliant transport of hazardous and non-hazardous waste from the point of generation to its final disposal or recycling destination. Proper transportation planning helps to minimize environmental risks, prevent accidents, ensure regulatory compliance, and optimize logistics.

This section outlines the standard operating procedures (SOPs) for waste transportation, including vehicle selection, driver protocols, load security, emergency response, tracking, and journey planning.

6.1 VEHICLE SELECTION AND PREPARATION

To ensure the safe and efficient transport of waste materials, the correct type of vehicle must be used, based on the waste category, quantity, and regulatory requirements.

6.1.1 Vehicle Selection Criteria

Each type of waste requires a specific transport method to prevent leaks, spills, or exposure to the environment. The following criteria are used when selecting vehicles:

- Non-hazardous waste: Standard trucks with enclosed compartments, tipper trucks, or containerized units.
- Hazardous waste: Specialized ADR-compliant vehicles (Accord Dangerous Route vehicles) with double-sealed containment, spill-proof tanks, fire suppression systems, and chemical-resistant linings.
- E-waste and recyclable materials: Enclosed trucks with climate control and shock-absorbing compartments to prevent damage to recyclable components.

6.1.2 Vehicle Inspection and Maintenance

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Before each waste collection trip, the vehicle undergoes a pre-dispatch safety inspection to ensure compliance with safety regulations. The inspection checklist includes:

- Brake system check (functional brakes, fluid levels, emergency braking system).
- Tire condition (tread depth, inflation level).
- Leak-proof and sealed compartments (to prevent spills).
- Fire safety equipment (fire extinguishers, emergency response kit).
- GPS tracking system (for route monitoring and safety compliance).
- Load-bearing capacity check (to prevent overloading).

Vehicles must also undergo scheduled preventive maintenance every 3,000–5,000 km, with a detailed service log maintained by the fleet management department.

6.2 LOADING AND SECURING WASTE FOR TRANSPORT

6.2.1 Loading Procedures

To prevent spills, contamination, and safety hazards, the following steps must be followed during loading:

1. Ensure waste is correctly categorized and segregated before loading.
2. Use appropriate containers:
    - Liquid waste: Leak-proof barrels, UN-certified sealed drums.
    - Solid hazardous waste: Double-sealed containers, metal drums.
    - Recyclable materials: Clean, dry storage units to prevent contamination.
3. Load according to weight distribution regulations to prevent vehicle imbalance.
4. Label all containers clearly with hazard classification, weight, and contents per the Globally Harmonized System (GHS).
5. Double-check fastenings using industrial-grade straps, locks, and security seals.

6.2.2 Waste Transfer Documentation

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Once the waste is securely loaded, a Waste Transfer Note (WTN) is issued, which must include:

- Name and address of the waste generator.
- Type and volume of waste being transported.
- Destination facility for disposal or recycling.
- Date and time of collection.
- Transporter details (driver's name, vehicle registration, tracking number).

A digital copy of the WTN is logged into the company's waste tracking system for record-keeping and regulatory audits.

6.3 JOURNEY MANAGEMENT PLAN (JMP)

A Journey Management Plan (JMP) ensures that waste transportation follows safe, efficient, and regulatory-compliant routes. It includes:

6.3.1 Route Planning and Optimization

- Shortest, safest, and least congested route from collection point to disposal/recycling site.
- Avoidance of restricted areas, high-traffic zones, and environmentally sensitive locations.
- Pre-determined emergency stop points (hospitals, fire stations, police checkpoints).
- Weather and road condition assessments to avoid flood-prone or damaged roads.

6.3.2 Driver Assignment and Safety Protocols

Each journey is assigned to a certified waste transportation driver, trained in:

- Defensive driving and hazardous material (HAZMAT) handling.
- Emergency response for spills and accidents.
- GPS monitoring and communication protocols.

Driver Safety Requirements:

- Mandatory rest breaks every 4 hours.
- Strict no-phone-use policy while driving.
- Speed limit adherence (within legal transport regulations).
- Random alcohol and drug testing before dispatch.

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6.3.3 Real-Time Tracking and Monitoring

All transport vehicles are fitted with GPS tracking and real-time telematics, enabling:

- Live location monitoring by the operations control center.
- Route deviation alerts (for security and compliance).
- Geofencing alerts when entering high-risk zones.
- Remote engine shut-off capability in case of unauthorized diversions.

6.3.4 Emergency Preparedness Plan

In the event of an accident, spill, or security threat, the following response protocol is activated:

1. Immediate driver notification to control center via emergency panic button.
2. Deployment of spill response team (if applicable).
3. Police and environmental authority notification if hazardous materials are involved.
4. Secure perimeter establishment to minimize exposure risks.
5. Activation of containment procedures using absorbent materials, spill booms, and neutralizing agents.

A post-incident report is generated for all emergency events, and corrective actions are implemented.

6.4 UNLOADING AND WASTE HANDOVER

Upon reaching the disposal or recycling facility, the unloading process follows strict safety procedures to ensure that waste is transferred safely and legally.

6.4.1 Unloading Protocols

1. Verify documentation with the receiving facility (match WTN with actual waste delivered).
2. Ensure waste containers are intact before unloading.
3. Use mechanical unloading equipment (cranes, hydraulic lifters) for heavy loads.
4. Conduct final waste inspection to ensure no cross-contamination occurred during transit.
5. Confirm waste acceptance receipt from the facility.

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6.4.2 Certification of Transport and Disposal

Once unloading is complete, the following certificates are issued:

- Certificate of Disposal (for incinerated or landfilled waste).
- Certificate of Destruction (for sensitive materials requiring destruction).
- Recycling Certificate (for materials successfully recycled).

All certificates are logged into the company's waste management system and issued to the waste generator for compliance verification.

6.5 COMPLIANCE WITH REGULATORY AND SAFETY STANDARDS

All waste transportation activities comply with Ugandan environmental and transport regulations, including:

- National Environment Management Authority (NEMA) Guidelines.
- ISO 14001: Environmental Management Systems.
- ADR (Agreement concerning the International Carriage of Dangerous Goods by Road) Regulations.
- OSHA (Occupational Safety and Health Act) Transport Safety Standards.

All personnel involved in waste transportation undergo annual refresher training in waste handling, safety, and compliance procedures.

6.6 CONTINUOUS IMPROVEMENT AND AUDIT PROCESS

The journey management and transportation process is continuously monitored and reviewed quarterly to identify areas for improvement. Performance indicators include:

- On-time delivery rate.
- Incidents per 1,000 km traveled.
- Compliance audit pass rates.
- Customer satisfaction with waste transport services.

Periodic audits and stakeholder feedback ensure that transport efficiency, safety, and environmental sustainability are consistently enhanced.

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7. HEALTH, SAFETY, AND ENVIRONMENTAL (HSE) REQUIREMENTS

7.1 Introduction

The Health, Safety, and Environmental (HSE) requirements outlined in this Standard Operating Procedure (SOP) ensure that waste management and scrap disposal activities conducted by Mkubwa Mixed Steel and Logistics LTD are performed in compliance with occupational health and safety regulations, environmental laws, and best industry practices.

This section covers hazard identification, risk assessment, control measures, personnel safety, waste handling procedures, emergency preparedness, and environmental protection measures.

7.2 HSE Objectives

The primary HSE objectives in waste management operations are:

1. Ensure worker safety during waste handling, transportation, and disposal.
2. Prevent environmental contamination through proper waste containment and disposal.
3. Minimize occupational health risks associated with hazardous waste.
4. Comply with national and international environmental and safety regulations.
5. Reduce workplace accidents and incidents through strict adherence to safety protocols.

7.3 Personal Protective Equipment (PPE) Requirements

To protect personnel from hazardous exposures, appropriate PPE must be worn at all times during waste handling, transportation, and disposal operations.

PPE Storage & Maintenance Guidelines

- All PPE must be inspected before and after use for wear and tear.
- Damaged PPE should be immediately replaced.
- PPE should be stored in clean, dry locations away from contaminants.
- Employees should be trained on proper PPE use and disposal.

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7.4 Hazardous Waste Handling Procedures

Hazardous waste poses significant risks to human health and the environment. The following strict protocols must be followed:

7.4.1 Identification & Labelling

- Hazardous waste must be correctly identified and labelled per regulatory requirements.
- Labels should indicate:
  - Type of waste (e.g., flammable, corrosive, toxic, reactive).
  - Date of collection and expected disposal method.
  - Handling precautions (e.g., "Avoid skin contact," "Do not inhale fumes").

7.4.2 Containment & Storage

- Hazardous waste must be stored in approved containment units (e.g., UN-certified drums, leak-proof containers).
- Secondary containment systems (e.g., spill trays, bund walls) should be in place to prevent leaks.
- Waste should be segregated by type (e.g., chemicals stored separately from medical waste).

7.4.3 Handling & Transportation

- Only trained personnel should handle hazardous waste.
- Avoid direct skin contact by using appropriate PPE.
- Spill kits must be readily available in case of accidental leaks.
- Hazardous waste must be transported using designated vehicles with appropriate warning signs.

7.5 Emergency Preparedness & Response

Emergencies such as waste spills, chemical exposure, fires, and transport accidents require immediate action. The following procedures apply:

7.5.1 Emergency Response Plan (ERP)

All waste management teams must be familiar with the company's Emergency Response Plan (ERP), which includes:

- Immediate first aid response for chemical exposure or injuries.

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- Spill containment and cleanup procedures.
- Emergency evacuation routes and assembly points.
- Fire safety and use of fire extinguishers.
- Emergency contacts for HSE officers, local authorities, and medical facilities.

7.5.2 Spill Control Procedures

- Small spills: Use absorbent materials (e.g., sand, sawdust) to contain the waste.
- Large spills: Isolate the area, use spill containment booms, and notify the emergency response team.
- For chemical spills: Wear appropriate respiratory protection and neutralize hazardous substances if safe to do so.

7.5.3 Fire Prevention and Control

- Store flammable waste separately from other materials.
- Keep fire extinguishers and sand buckets in all waste handling areas.
- Train workers in fire emergency procedures and evacuation protocols.

7.6 Waste Transportation Safety

Transportation of waste must comply with NEMA, UNBS, and international transport safety standards. The following rules apply:

7.6.1 Vehicle Safety Checks

- Daily vehicle inspections must be performed before waste collection.
- Brakes, tire pressure, lights, and containment systems should be fully functional.
- Vehicles must be equipped with emergency kits, fire extinguishers, and spill containment kits.

7.6.2 Driver & Crew Safety

- Only trained and certified drivers are allowed to transport waste.
- Drivers must undergo annual HSE training.
- No unauthorized passengers should be allowed in the waste transport vehicle.

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7.6.3 Load Security

- Waste containers must be properly sealed and secured to prevent leaks.
- For hazardous waste, vehicles must display the appropriate hazard warning placards.
- Transporting incompatible wastes together is strictly prohibited.

7.7 Environmental Protection Measures

To ensure sustainable waste management, Mkubwa Mixed Steel and Logistics LTD follows best environmental practices, including:

7.7.1 Pollution Control & Waste Minimization

- Implement waste reduction strategies (e.g., reusing and recycling materials).
- Use bio-remediation techniques to treat contaminated soil and water.
- Monitor air emissions from waste incineration processes.

7.7.2 Compliance with Environmental Regulations

- Follow NEMA guidelines on waste handling, storage, and disposal.
- Conduct Environmental Impact Assessments (EIA) before engaging in large-scale disposal activities.
- Ensure zero illegal dumping and proper documentation of waste disposal records.

7.8 Health Surveillance & Employee Well-being

All employees working in waste management must undergo regular health check-ups to monitor exposure to hazardous materials.

7.8.1 Medical Surveillance Program

- Workers handling hazardous waste must undergo bi-annual medical check-ups.
- Tests should include lung function tests, blood toxicity screenings, and skin exposure assessments.
- Employees must be vaccinated against tetanus, hepatitis B, and other workplace hazards.

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7.8.2 Mental Health & Stress Management

- Waste management staff should have access to counselling and stress management programs.
- Periodic safety debriefs should be conducted after hazardous waste incidents.

7.9 HSE Training & Continuous Improvement

To maintain high safety standards:

1. Quarterly HSE training sessions must be conducted for all employees.
2. Waste management teams must receive specialized training on hazardous waste handling.
3. Annual safety audits should be conducted to identify HSE compliance gaps.
4. Lessons learned from past incidents should be integrated into future SOP updates.

7.10 Conclusion

The success of Mkubwa Mixed Steel and Logistics LTD's waste management operations rely on strict adherence to HSE regulations and continuous improvement in safety measures.

By implementing this section's safety protocols, the company ensures regulatory compliance, environmental protection, and the well-being of all personnel involved in waste handling, transportation, and disposal.

8. COMPLIANCE AND REGULATORY REQUIREMENTS

- NEMA Guidelines
- ISO 14001: Environmental Management Systems
- Basel Convention on Transboundary Movements of Hazardous Waste

9. RECORD KEEPING & DOCUMENTATION

- WTNs, Destruction Certificates, Recycling Reports must be archived for 5 years.

10. REVIEW & CONTINUOUS IMPROVEMENT

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- This SOP will be reviewed annually and updated to reflect regulatory changes.

Authorizations and Approvals

Authorized by	Opio Charles	Chief Executive Officer	
Approved by	Bulega Sulaiman	General Manager	

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