

# GLOBAL WASTE MANAGEMENT POLICY

## Purpose

This policy is to establish minimum waste management requirements and ensure responsible and legal practices while reducing risk to Ecolab.

## Scope

This policy applies to all Ecolab employees and locations that generate, store, offer for transport or disposal, or handle Ecolab waste materials. This includes, but is not limited to, hazardous and nonhazardous solid and liquid waste generated from our operations, packaging materials, expired product, expired raw materials and product that is deemed off-specification. In the event this policy conflicts with government or local standards, codes or regulations, then the most stringent requirements will apply. Waste generated by our customers or other end users is not in scope; however, materials returned to an Ecolab location for evaluation under the [Ecolab Customer Returns Policy](#) are in scope.

## Policy

All Ecolab facilities and employees shall comply with all applicable country, regional and local waste laws and regulations.

### Waste Management Hierarchy

- Ecolab will adhere to a waste management hierarchy that minimizes the impact of waste generation on the environment and includes the following (in order of most to least desired):
  - Elimination or minimization of waste using engineering controls and plant processes;
  - Recycling and reuse of materials whenever possible and practicable; and
  - Selection of approved treatment and disposal methods.

### Management and Storage

- All wastes generated on site, or materials that will ultimately be treated as waste, must be properly identified, segregated and characterized within 90 days of generating or receiving the material to ensure proper storage, management and disposal.
- Waste containers and tanks must be in good condition with no evidence of damage (e.g., rusting, corrosion, or cracking) and compatible with the materials that are stored within. All waste containers must be labeled with the contents of the container and dated in accordance with applicable regulation.
- Waste storage areas must have incompatible materials properly segregated, have emergency response equipment readily available and be kept clean with adequate room for storage and inspection. Waste containers and tanks must be stored within adequate secondary containment.
- Inspections of waste containers, waste tanks and associated storage and secondary containment areas are to be performed at least monthly or more frequently if required by government regulation.

- All manufacturing sites and owned or operated warehouse locations must report waste type, source, volume, destination and disposal/treatment method through the applicable site contact to the appropriate SHE teams. This data represents our most significant waste impact and risk to the organization. This data will be monitored monthly and reported publicly on an annual basis.

### Off-Specification, Expired, Samples and Returned Product

- Each Ecolab facility must have a process in place to manage off-specification, expired and discontinued products. If the material is not acceptable for use or re-work, it must be prepared for off-site disposal as required by applicable regulation.
- Divisions will establish protocols that include the minimum requirements for the return of unused, off-specification or recalled materials from customers. If the returned product cannot be reused, the receiving facility will make a waste determination within 90 days of receipt and ensure that all wastes are disposed in accordance with government regulations, this policy, applicable procedures and current contracts with waste vendors.
- Disposal of product samples, water samples and test reagents at customer locations must be managed with the approval and coordination of the customer based on specific knowledge of the material, or by an approved waste vendor.
- Ecolab products, raw materials or off-specification materials must not be discharged into a septic system or disposed of with municipal solid waste.

### Waste Vendor Management

- All Ecolab wastes must be shipped using transporters who are approved or licensed according to applicable governmental regulation and sent to disposal sites that are licensed by the appropriate governmental agencies. All waste disposal facilities must be individually approved for use by Global Safety, Health & Environment (SHE) as described below.
- Waste disposal facilities will be audited every three to five years for compliance with environmental, health and safety regulations and company policies based on actual and potential risk. Audits may be performed by qualified internal personnel (using internal protocols developed by the Global SHE department), outside environmental consulting firms or through the CHWMEG ([www.chwmeg.org](http://www.chwmeg.org)) organization (preferred).
  - Audits are not needed for haulers, transfer stations, brokers / vendors, disposal facilities required to be used by a government agency, general plant trash and cafeteria waste, clean recycled materials (e.g., clean plastic, wood pallets, steel, concrete) and medical waste.
- Ecolab will establish Master Service Agreements (MSAs) with companies who own and/or operate waste treatment, storage, recycling and disposal facilities, or who manage wastes on Ecolab's behalf. All waste vendors must sign Ecolab's MSA. Any changes to the MSA must be approved by the Global SHE and Law Departments and authorized by the Procurement Department, who is the depository for signed agreements. MSAs and certificates of insurance are retained in accordance with Procurement work processes and policies.
- Ecolab's policy is to minimize the number of waste vendors required for provision of services. Therefore, consultation with the Waste Category Manager in Indirect Procurement is advised when there are requests to contract with new vendors, changes are desired with existing vendors or negotiation of lower rates are needed. Each facility should review their waste vendors annually and develop action items to consolidate. The approved vendor list is maintained by Procurement.

### Packaging Considerations

- Effort should be made to ensure all product packaging is reusable to reduce packaging waste across our value chain. Where reuse is not feasible, we will shift to readily recyclable packaging. Empty containers, previously used for waste storage, must be sent to an approved facility for reconditioning (most preferable option), recycling or disposal (least preferable option).

### Incident Investigation and Corrective Action

- Waste and effluent related incidents are subject to our internal incident investigation policies for root causes analysis and corrective action.

### Training and Recordkeeping

- All employees who generate, handle, store, inspect or ship waste must receive training as appropriate for their job function and in accordance with all applicable country, regional and local laws and regulations.
- Waste manifests, waste profiles, waste inspections, waste reports, waste facility audits and government correspondence shall be kept for a minimum of 10 years or longer if required by government regulation or Ecolab Records Retention Policy.

### Explanation of Key Terms

**Waste** | A material (solid, liquid or gas) that is intended for disposal and that may be subject to government regulation or has the potential to cause harm to human health or the environment. Types of waste may include, but are not limited to, hazardous (may also be referred to as industrial, special, or contaminated waste), non-hazardous, universal (e.g., bulbs and batteries), or otherwise regulated (e.g., asbestos, used oil, polychlorinated biphenyls), but excluding ordinary trash.

**Hazardous Waste** | Waste which exhibits certain hazardous characteristics and is potentially harmful to human health or the environment as defined by the laws of the jurisdiction. Hazardous waste is primarily generated by processes which contain flammable, combustible or corrosive chemicals. It can also be generated when chemicals are expired or off-specification.

**Non-Hazardous Waste** | Waste which does not exhibit hazardous characteristics but is potentially harmful to the environment.

**Universal Waste** | Common wastes that may be considered hazardous waste according to local or country regulation (e.g., bulbs and batteries). Many types of universal wastes may be recycled.

**Disposal Facility** | Any facility that conducts waste treatment (e.g., incineration, chemical or biological treatment, solidification, blending, etc.), or waste recycling (e.g., burning for energy recovery, metals recovery, etc.), as well as landfills.

**Effluent** | Non-hazardous liquid discharge leaving the site as treated or untreated wastewater.

## Responsibility

### Global Safety, Health & Environment (SHE)

- Provide advice and consultation to divisions, markets and functions on waste management.
- Manage the review process for waste disposal facilities and maintain a current list of approved disposal facilities and audit reports.
- Periodically review this policy and update as necessary.

### Division, Market, Function Management and Global Supply Chain SHE

- Develop and implement policies and standards pertaining to the return of unused, off-specification or recalled products from customers and distributors.
- Ensure that employees involved in product returns and management of wastes receive training as appropriate for their job function.
- Ensure compliance with this policy.

### Employees

- Attend required training on the generation, handling, storage, inspection and transportation of waste as necessary.
- Understand and comply with this policy.

### On-Site Contractors

- Ensure their employees receive training and are competent on the handling, storage or inspection of wastes as necessary.
- Understand and comply with this policy.

## References

- [Ecolab Customer Returns Policy](#)

Version #	Date	Description	Revised By
Initial Release	07/31/2018	Initial Release	Global SHE
2	12/15/2021	Policy Refresh	Global SHE