

Legrand, North and Central America Solid Waste Policy

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<u>Index</u>	<u>Section</u>
Purpose	1.0
Scope	2.0
Policy	3.0
Responsibility	4.0

<u>Procedures</u>	<u>Section</u>
Facilities	5.0
Housekeeping Contracts/Relations	6.0
Products and Product Delivery	7.0
Annual Assessments	8.0
References	9.0

Appendix A: Solid Waste Policy Communications Suggestions

Appendix B: Sustainability Operations Data Input

Appendix C: Audit Form

Appendix D: Waste Management Hierarchy

Appendix E: Standard Labeling and Signage

Appendix F: Waste Audits

Appendix G: Composting

Appendix H: Identifying What Goes to Landfill

Appendix I: Waste Provider Relationship

Appendix J: Analyze Bin Placement

Appendix K: Future Considerations

1.0 **PURPOSE**

The purpose of this policy is to define the guidelines for waste management across Legrand, North and Central America and to serve as a driver for continuous improvement while standardizing waste practices in order to unify our approach. There may always be site specific activities regarding waste, but common waste-stream procedures should be standardized. The policy is in support of Legrand's ISO 14001 objectives.

1.1 **OBJECTIVES**

Legrand, North and Central America is committed to sound and reliable waste management practices and shall be in compliance with all legal requirements. Facilities shall continually improve waste diversion with an ultimate goal of achieving Platinum Level by the year 2022; virtually Zero Waste to Landfill.

Tiers of Waste Diversion

- Bronze Level: 85.0% - 90.0%
- Silver Level: 90.0% - 94.0%
- Gold Level: 95.0% - 99.4%
- Platinum Level: 99.5%+

Material may only be considered for landfill disposal if it cannot be prevented by the following hierarchy framework:

1. Source Reduction & Reuse – Source reduction, also known as waste prevention, means reducing waste at the source, and is the most environmentally preferred strategy. It can take many different forms, including reusing or donating items, buying in bulk, reducing packaging, redesigning products, and reducing toxicity. Source reduction also is important in manufacturing. Light weighting of packaging, reuse, and remanufacturing are all becoming more popular business trends. Additionally, purchasing products that incorporate these features supports source reduction.

2. Recycling and Composting - Recycling is a series of activities that includes collecting used, reused, or unused items that would otherwise be considered landfill waste; sorting and processing the recyclable products into raw materials; and remanufacturing the recycled raw materials into new products. Recycling also can include composting of food scraps, yard trimmings, and other organic materials.

3. Energy Recovery - Energy recovery from waste is the conversion of non-recyclable waste materials into usable heat, electricity, or fuel through a variety of processes, including combustion, gasification, pyrolysis, anaerobic digestion, and landfill gas (LFG) recovery. This process is often called waste-to-energy (WTE). Converting non-recyclable waste materials into electricity and heat generates a renewable energy source and reduces carbon emissions by offsetting the need for energy from fossil sources and reduces methane generation from landfills. After energy is recovered, a

facility-specific percent of the volume remains as ash, which is generally sent to a landfill.

2.0 **SCOPE**

This policy applies to all Legrand, North and Central America facilities and associates. All associates shall use this policy to guide behavior in regard to waste management. The policy focuses on broad areas that are applicable to most sites. These key areas include manufacturing, distribution and warehouse, and office environments.

3.0 **POLICY**

The solid waste policy defines many opportunities throughout Legrand, North and Central America to reduce waste sent to landfill. The policy is designed to support the sustainability and operational excellence initiatives of the company. The policy documents system methods for waste management and techniques for reducing environmental impacts through the diversion of waste from landfill.

Legrand has a commitment to environmental stewardship. The waste policy is in alignment with our Environmental Policy [EMS-001, LNCA EMS Manual Section 5.2](#). We are committed to reducing both the short and long-term negative impacts of our business on the environments of our communities in the following ways:

- Building efficiency into our manufacturing process by using all possible material, reusing left over material, and recycling when we cannot
- Setting and holding ourselves accountable to achieve specific annual landfill diversion targets to improve performance in waste management
- Preventing pollution associated with waste at the source whenever and wherever possible
- Minimize our direct and indirect impacts to protect the environment by reducing the amount of waste sent to landfills
- Ensuring safe and proper management of hazardous materials and waste
- Ensuring compliance with relevant solid waste laws, regulations, and other requirements

Leased Facilities: Site Leaders working in leased facilities may be required to coordinate with building owners to ensure that the requirements of this policy are met and responsibilities are properly understood.

- 3.1 **Policy Communication**: The policy shall be communicated to all newly hired employees as part of their new-hire orientation. Suggestions for methods to communicate the policy effectively throughout the workforce can be found in **Appendix A**.

- 3.2 **Policy Input:** Legrand associates may give input or suggestions to the policy by submitting all comments to the Sustainability Operations Team Leader or Sustainability Analyst.
- 3.3 **Policy Review Period:** The policy shall be reviewed annually by the ISO 14001 representatives and/or Sustainability Operations Team members. The Sustainability Operations Team Leader shall initiate this review no later than March 31st and conclude no later than June 30th of each year.

4.0 **RESPONSIBILITY**

- 4.1 The Sustainability Operations Team leader has ultimate responsibility for implementation, upkeep and ensuring adherence to this policy.
- 4.2 The Vice President of Energy Efficiency, Sustainability and Public Policy is the executive sponsor of this policy.
- 4.3 The Sustainability Analyst is responsible for supporting the Sustainability Operations Team Leader in the management of this policy and serves as a resource for Sustainability Operations Team Site Leader.
- 4.4 The Operations Sustainability Team Site Leader and Plant Manager/Senior Leader for each Legrand, North and Central America facility is responsible for implementation of this policy and ensuring it is communicated to employees at their site.
- 4.5 All local managers and supervisors have the responsibility for training associates and contracted third parties on the policy.
- 4.6 Associates are responsible for adhering to the policy requirements. In the event of any possible conflict of interests preventing associates from conformance, the associate should raise the issue to their supervisor. If there is a local Environmental Management System Representative (EMSR) at the site, he or she should be notified by either the associate or the associate's supervisor.

PROCEDURES

5.0 **FACILITIES**

5.1 **Scope of Facilities**

Facilities are the owned and leased physical infrastructure of a building, both permanent and removable.

5.2 **Definitions**

5.2.1 Compostable Waste: Organic waste material that can be transformed into compost. Compostable materials may include food scraps, coffee grounds and filter, yard trimmings, soiled paper, and any type compostable plastics like cutlery and or compostable plastic bags, etc. Compostable materials may vary from state to state.

5.2.1.1 Compost: Organic material that is decomposed produced when bacteria breaks down biodegradable waste, yielding a nutrient rich soil. Composting does not happen freely at a landfill but must be done in a safe and timely manner in a composting facility or in a home device.

- 5.2.2 **Electronic Waste or “E-Waste”:** Any discarded electronic or electrical equipment that enters the waste stream. Almost any household or business item with circuitry or electrical components with power or battery supply, such as: computers, televisions, VCRs, stereos, copiers and printers.
- 5.2.3 **Hazardous Waste:** Hazardous waste is waste that is dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, gases, or sludges. They can be discarded commercial products, like cleaning fluids or pesticides, or the by-products of manufacturing processes. Hazardous wastes are defined under national and/ or local laws and regulations. The specific policy requirements of this document apply to hazardous wastes, but local laws and regulations for hazardous wastes may contain additional requirements that must be met by Legrand, North and Central America facilities.
- 5.2.4 **ISO 14001 – Environmental management:** One of a family of standards from the International Standards Organization that sets requirements for how organizations manage their environmental impacts to prevent pollution, maintain legal compliance, and continuously improve.
- 5.2.5 **Landfill Diversion:** The process of preventing (or diverting) materials from entering landfills through source reduction, recycling, composting, and energy recovery. A landfill diversion rate is calculated by dividing the weight of the material diverted over the total material leaving the facility (including landfill).
- 5.2.6 **Landfill Waste:** Waste that is disposed of by burial in suitable geological sites. Landfill sites are generally selected away from faults, wetlands, flood plains, or other restricted areas.
- 5.2.7 **Non-Hazardous Waste:** Wastes generated from an industrial operation that do not exhibit hazardous waste characteristics and are not recognized as hazardous wastes, special wastes, or universal wastes.
 - 5.2.7.1 **Examples include:** filters, filter paper, machine coolants, water based paints, absorbents, and soiled rags.
- 5.2.8 **Recyclable Waste:** Any waste not otherwise defined in this document that can be collected and processed into new materials that would otherwise be disposed of by incineration or landfill deposition.

- 5.2.9 **Refinery Device:** Electrical wiring devices composed of plastic and precious metals (copper, brass, silver, or steel, steel, etc.) that are recycled for the value of their metal content.
- 5.2.10 **Special Wastes:** Wastes that require special management under local laws and regulations. Special waste is a form of hazardous waste and is typically generated in large volumes. It generally poses less risk to human health and the environment than other more heavily regulated hazardous waste.
- Special Wastes include:** cement kiln dust, mining waste, oil and gas drilling muds, oil production brines, phosphate rock mining and processing waste, uranium waste, fossil fuel combustion waste, medical waste, used oil (unless defined by local regulations to be hazardous), asbestos, used tires, and construction and demolition wastes.
- 5.2.11 **Universal Waste:** Waste materials designated as “hazardous waste”, but containing materials that are common. These materials should be recycled or disposed of with some level of special handling and/or regulatory control. It is defined by the United States Environmental Protection Agency (US EPA 40 C.F.R. 273.9) but states or provinces can modify the universal waste rule and add additional universal waste(s). EPA regulations govern the collection and management of these wastes, thus facilitating environmentally sound collection and proper recycling or treatment. Facilities should check with their local government for the exact regulations that apply.
- Universal Wastes include:** batteries, pesticides, and mercury-containing equipment/devices (i.e. many thermostats, fluorescent lamps, and compact fluorescent lamps).
- 5.2.12 **Waste:** Any item or material that is no longer needed or wanted. Examples include, but is not limited to, hazardous, special, universal, and non-hazardous waste that is generated or present at Legrand, North and Central America facilities.
- Wastes include:** solids, combustibles, non-combustibles, sludges, pesticides, chemicals, waste liquids, and other materials that are no longer suitable for their intended purpose or an acceptable alternative use. This standard does not apply to waste water of any type (process or domestic).
- 5.2.13 **Waste Minimization:** Measures or techniques that reduce the amount of wastes generated. The term is also applied to recycling and other efforts to reduce the amount of waste going to landfill.
- 5.2.14 **White Goods:** Any appliance utilizing electricity, oil, natural gas or liquefied petroleum gas to supply heat or motive power to preserve or cook food, to wash or dry clothing, kitchen utensils and related items, or to cool or heat

air or water. These heavy consumer durables once were only available in a white enamel finish, hence the name. Today, they could be any color.

White Goods include: refrigerators, stoves, water heaters, freezers, dishwashers, trash compactors, washers, dryers, air conditioners & large commercial appliances.

5.3 **Facilities Policy:**

5.3.1 **Compostable Waste**

5.3.1.1 Compostable waste remains an area of opportunity for many Legrand, North and Central America facilities. The lack of commercial services for compostable waste remains problematic in many locations. All locations shall investigate the availability of commercial compostable waste services, and where feasible, shall segregate compostable wastes for natural biological breakdown processes. For guidance on implementing a composting program on-site, refer to APENDIX G

5.3.2 **Electronic Waste “E-Waste”**

5.3.2.1 E-Waste shall be handled by Legrand, North and Central America associates, properly selected vendors.

5.3.3 **Hazardous Waste**

5.3.3.1 All facilities generating Hazardous Waste shall have written instructions on proper handling of such waste at their site.

5.3.3.2 All facilities generating Hazardous Waste shall have a written security plan for transportation & storing hazardous waste in order to minimize the associated risks.

5.3.3.3 Hazardous waste identification shall be done annually and whenever there are changes to the process that generates the waste.

5.3.4 **Measurements and Recordings**

5.3.4.1 Each site shall measure monthly waste being sent to landfill and diverted from landfill and record results on the Sustainability Operations Team SharePoint website:

<https://grpleg.sharepoint.com/sites/countries/LNCA/initiatives/sustainability/Operations/Forms/AllItems.aspx?slid=a0c65e9e-10a8-5000-f3f2-dd0da3e30faa&FolderCTID=0x0120003901E092C5017B47BA525EF50559BC55&id=%2Fsites%2Fcountries%2FLNCA%2Finitiatives%2Fsustainability%2FOperations%2FNatural%20Resource%20Trackers>

Diversion rate percentages will automatically calculate within the tracker once measurements are recorded.

5.3.4.2 Other specific waste minimization measurements can be designated by the Sustainability Analyst and/or Sustainability Operations Team leader at any time.

5.3.4.3 The Sustainability Operations Team SharePoint site can be found at the following web address:

<https://grpleg.sharepoint.com/sites/countries/LNCA/initiatives/sustainability/Operations/Forms/AllItems.aspx?slid=a0c65e9e-10a8-5000-f3f2-dd0da3e30faa&FolderCTID=0x0120003901E092C5017B47BA525EF50559BC55&id=%2Fsites%2Fcountries%2FLNCA%2Finitiatives%2Fsustainability%2FOperations%2FNatural%20Resource%20Trackers>

5.3.4.4 For site assistance, please contact the Sustainability Analyst.

5.3.5 **Non-Hazardous Waste**

5.3.5.1 To the maximum extent possible all non-hazardous wastes should be discarded in an appropriate manner to prevent it from ending up in a landfill.

5.3.5.2 Non-hazardous waste identification should be completed annually, and whenever there are changes to the process that generates the waste.

5.3.5.3 All non-hazardous waste containers shall be properly labeled and identified by its proper waste name as defined by its waste profile.

5.3.5.4 Most non-hazardous wastes are stored in sealed drums or containers and hauled away by licensed waste haulers for proper disposal.

5.3.5.5 There is no storage time limit for non-hazardous wastes, but best management practices dictate that they should not be allowed to accumulate for more than 12 months.

5.3.6 **Recyclable Waste**

5.3.6.1 All sites shall establish a method for determining and collecting recyclable wastes. All sites shall recycle at a minimum the following waste types: aluminum cans, plastic bottles, paper, cardboard, manufacturing metals, and plastics.

5.3.7 **Reusable & Returnable Packing Materials**

5.3.7.1 Reusable and returnable packaging materials are materials that can be used more than one time.

There are several categories of reusable packaging typically found in industry.

- Dunnage (craft paper void filler, bubble wrap, air pouches, etc.)
- Pallets
- Corner Board
- Stretch Wrap
- Cartons
- Straps

- Paper (printing on both sides)
- Foam packing
- Plastic/Steel barrels

Returnable Packaging

- Cartons with cut-out protective inserts
- Wood Crates

5.3.8 Special Waste

5.3.8.1 Facilities should check their respective states or provincial environmental regulations to determine the proper waste treatment plan. In most cases, federal guidelines for the treatment of special wastes have not been established, however, facilities should check for new federal regulations that may arise. This should include selection of properly licensed special waste haulers that can provide the necessary documentation to evince proper disposal.

5.3.9 Universal Waste

5.3.9.1 Facilities shall determine federal, state/provincial and local requirements, and meet or exceed all regulations for proper handling, storage and disposal. All universal waste shall have a designated accumulation area and be removed from sites for proper disposal within one year of the accumulation start date.

5.3.10 Waste Minimization/Elimination

5.3.10.1 Systems should be put in place such that recycling and disposal of landfill waste requires equal efforts for the associate.

5.3.10.2 All sites shall have goals for waste minimization and sites shall be accountable for reaching these metrics.

5.3.10.3 Onsite contractors and visitors shall be made aware of recycling programs while present at facilities. Instructions shall be given on proper disposal of materials. This may be accomplished by standard oral, written, or electronic communications.

5.3.11 White Goods

5.3.11.1 All waste white goods generated by Legrand, North and Central America shall be recycled. Associates should check with their Facilities Manager, EMSR or Sustainability Operations Team member for specific handling instructions.

6.0 Housekeeping Contracts/ Relations

6.1 Housekeeping services should not remove liners of any recycling or waste receptacles unless that liner has been contaminated with food or other wet waste. Container contents should be removed and the existing bag re-used when possible.

6.2 Housekeeping services should only utilize vacuum cleaners equipped with HEPA filters to reduce the spread of solid particulate indoor allergens.

- 6.3 Housekeeping services should minimize the environmental impacts that arise during cleaning operations by reducing consumption of product, packaging, and energy by buying effective products and using them efficiently to minimize waste and subsequent disposal to landfill.
- 6.4 Concentrated products should be favored when possible, as equivalent concentrated products generally have fewer environmental impacts (lower transportation energy and less container waste). Dilute and use products according to the manufacturer's instructions using accurate dosing systems where appropriate. Cleaning equipment should be serviced regularly, particularly critical items such as dosing pumps for automated machines.

7.0 Products and Product Delivery

- 7.1 Legrand, North and Central America will strive to reduce waste going to landfill in the form of end of life products from manufacturing facilities by doing the following:
 - Reduce packaging components of products when possible
 - Use biodegradable materials in packaging where feasible
 - Reuse packaging components when appropriate
 - Use recycled content in products when possible
 - Increase the ease of recycling and recyclability of product and product contents.

Explore opportunities for product recovery at end of life. (Metal and plastic raceway, electronics, and refinery devices are all recyclable.) Sites that handle these goods as scrap shall set up appropriate recycle streams for this material.

8.0 Annual Assessments

- 8.1 Annual audits shall be completed by June 30th starting the following calendar year after the initial assessment.
- 8.2 The annual audit shall be initiated by the Sustainability Operations Team Leader and monitored by the Sustainability Analyst.
 - 8.2.1 All sites shall have a person or team appointed to conduct waste assessments.
 - 8.2.2 Audits shall document conformance to this policy by referencing the specific policy section.
 - 8.2.3 Completed assessments shall be uploaded to the Sustainability Operations Team SharePoint library.
 - 8.2.4 Nonconformities shall be documented by site leader in accordance with the LNCA EMS-001 Manual. Nonconformities will be submitted to the appropriate Sustainability Team Leader and Sustainability Analyst for review and approval on LNCA form EF-009.
 - 8.2.5 Site leader shall be responsible for filling out section 1 and section 2 of form EF-009.

- 8.3 Landfill waste analysis shall be performed annually to identify opportunities to reduce waste going to landfill. For further guidance, refer to Appendix C.

9.0 References

- 9.1 <http://www.epa.gov/osw/hazard/>
9.2 Legrand, North and Central America Solid Waste Policy SharePoint page:

Appendix A:

FOR REFERENCE ONLY

Solid Waste Policy Communications Suggestions

Suggestions to communicate new policies and guidelines:

- Provide manager talking points for department / staff / all hands meetings & Quarterly Webcast
 - Ask managers to provide feedback from these discussion
- Refer to employees to [Sustainability SharePoint](#) where document is located
- Display on TV monitors around facility
- Include in new hire orientation package / meetings
- Include in in-plant training programs such as ISO 14001 Environmental Management System training

To reinforce behaviors:

- Insert Check box on purchase orders – “Does this purchase comply with solid waste policy guidelines?”
- Quarterly or Semi-annual TV or email reminders about different sections of the policy and where to find it

Appendix B: Sustainability Operations EMS Data Input Measurement Display

FOR REFERENCE ONLY

LNA Waste Year
Goal: Send zero was

Facility	Facility Type	2015								
		Headcount	Outgoing Materials (lbs)	Material Diverted From Landfill (lbs)	Material Sent to Landfill (lbs)	2015 YTD MO AVG	Net Waste Costs (\$)	Landfill Waste Per Person (lbs)	Landfill Diversion Rate (%)	He
Albia	Office		160	160	-	-	\$ 405.00		100.0%	
Anaheim	Mfg.	160	2,566,478	2,489,648	76,830	6,403	\$ (162,259.77)	480.19	97.0%	
Birmingham (closed '17)	Office	48	8,576	3,999	4,577	381		95.35	46.6%	
Carlsbad	Office	23	5,774	3,998	1,776	148	\$ -	77.20	69.2%	
Concord	Mfg.	285	2,771,916	2,424,016	347,900	28,992	\$ 24,689.00	1220.70	87.4%	
Dayton	Dist.	70	318,050	302,990	15,060	1,255	\$ 6,853.28	215.14	95.3%	
Denver	Mfg.									
Draper	Office									
EL Paso	Office	10	29,023	28,003	1,020	85	\$ 1,727.68	102.00	96.5%	
Fairfield	Mfg.	490	5,965,622	5,669,387	296,235	24,686	\$ -	604.56	95.0%	
Farmingdale	Mfg.									
Fort Mill	Dist.	265	1,292,008	1,216,888	75,120	6,260	\$ 4,658.23	283.47	94.2%	
Hebron	Office	18	11,267	7,505	3,762	314	\$ -	209.00	66.6%	
Hickory	Mfg.	101	203,494	105,882	97,612	8,134	\$ 28,203.15	966.46	52.0%	
Juarez	Mfg.	43	54,936	50,048	4,888	407	\$ 765.38	113.67	91.1%	
Mascoutah	Mfg.	98	975,807	848,127	127,680	10,640	\$ (95,841.90)	1306.67	86.9%	
Middletown	Office	42	9,937	3,157	6,780	565	\$ 5,373.87	161.43	31.8%	
New London	Office	76	6,829	4,360	2,469	206	\$ 1,944.29	32.49	63.8%	
Orem	Office	87	98,567	77,783	20,784	1,732	\$ -	238.90	78.9%	
Pensacola	Mfg.									
Richardson	Office	20	3,491	1,140	2,351	196	\$ -	117.55	32.7%	
Rancho Cucamonga	Dist.	45	36,958	36,958	-	-	\$ 2,155.50	0.00	100.0%	
Reno, NV	Mfg.									
Riverside	Dist.	10	51,215	49,568	1,647	137	\$ -	164.70	96.8%	
Rocom (Dongguan)	Mfg.									
San Jose	Office	37	5,893	1,725	4,169	347	\$ 3,098.16	112.67	29.3%	
SLEC (Shanghai)	Mfg.									
Somerset	Office									

STRATEGY	2018 INITIATIVES
Zero Waste to Landfill by 2022	Achieve 96.5% Landfill Waste Diversion

Objective: Demonstrate an organizations commitment to responsible management of end-of-life materials by quantifying and certifying total diverted waste.

Definitions:

Waste Diversion: The prevention and reduction of generated waste through source reduction, recycling, reuse, or composting.

Energy Recovery: From waste is the conversion of non-recyclable/ not economically recoverable materials into heat, electricity, or fuel through a variety of processes, including combustion, gasification, pyrolyzation, anaerobic digestion, and landfill gas recovery (LFG). This process is often called waste-to-energy.

Reusable: Products that are designed to be and can be used more than once.

Recycling: A process that turns materials that would otherwise be waste into valuable resources.

Alternative Daily Cover: Material other than earthen material placed on the surface of the active face of a municipal solid waste landfill at the end of each operating day to control vectors, fires, odors, blowing litter, and scavenging.

Source Reduction: A practice that eliminates waste at the source by not creating it in the first place. It can include redesign of products and packaging process efficiency improvements, material substitution, inventory control, improved housekeeping and/or preventative maintenance.

Reference Documents: ISO 14021; CFR 261.1; EPA Definitions

Acceptable Means of Diversion

Source Reduction

Recycling

Materials returned to supplier

Reuse in same process

Reuse in different process

Redesign to eliminate waste

Processing and selling to third party

Composting

Anaerobic digestion with energy recovery

Waste to Energy (non-recyclable/not economically recoverable)

Appendix C: Audit Form

DIALEG - SharePoint LNCA Home Divisions Services Initiatives

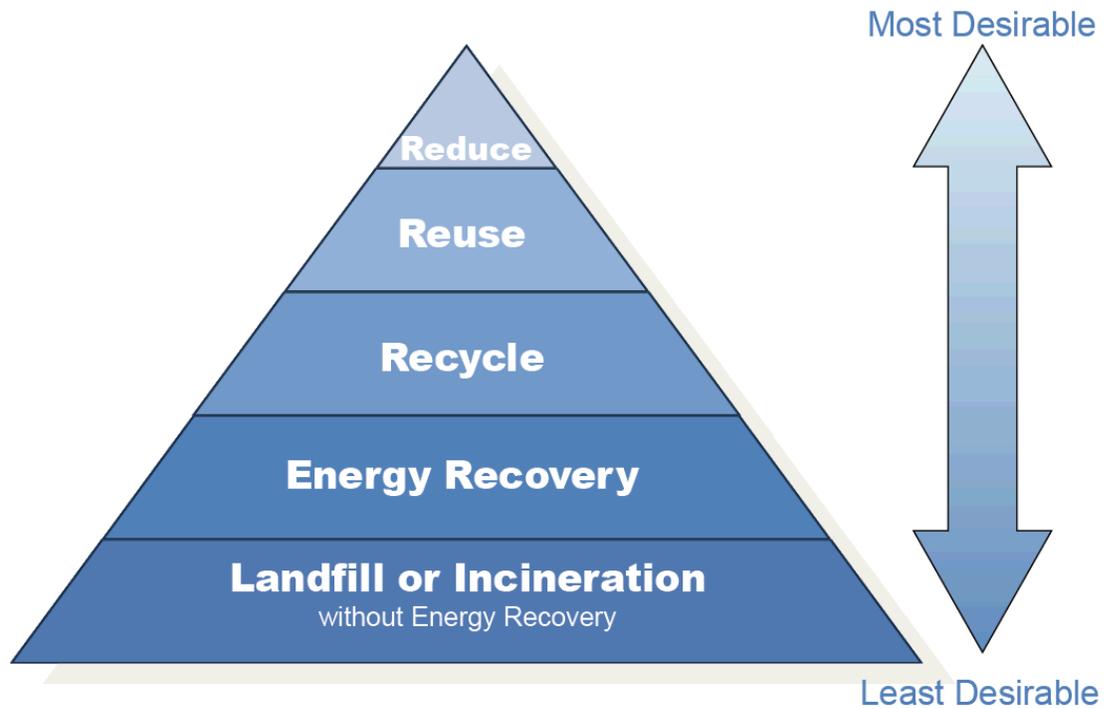
Sustainability

+ New Upload Share Copy link Sync Export to Excel Flow

Operations > Policy Audits

Name	Modified	Modified By	+ Add column
2015 POLICY AUDITS BY SITE	April 6	Jared Brocklehurst	
2016 POLICY AUDITS BY SITE	April 6	Jared Brocklehurst	
2017 POLICY AUDITS BY SITE	April 6	Jared Brocklehurst	
2018 POLICY AUDITS BY SITE	April 6	Jared Brocklehurst	
POLICY AUDIT FORMS	April 6	Jared Brocklehurst	

Appendix D: Waste Management Hierarchy



Source: <http://www.epa.gov/epawaste/nonhaz/municipal/hierarchy.htm>

Appendix E: Standard Labeling and Signage

Labels and signage are the cornerstones of Waste and Recycling Communications. They provide the ability to locate and identify receptacles for proper disposal & waste management. Properly posted signage provides valuable information for associates and visitors, and reminds employees of the waste & recycling locations they encounter upon entering a facility.

- **Label all bins – It is important to ensure that all bins have a label showing what should go in each bin to help eliminate any confusion.**
- **Color Code – Using the same color bins and signs for separate waste streams can help make it easier for people to know what should go in each bin (For example use blue bins for recycling and black bins for trash everywhere throughout the facility)**
- **Try to keep signage at eye level so it is easily readable**
- **Include examples (with pictures preferably)**
- **Include Don'ts as well to help eliminate confusion on what can and cannot go into a bin.**
- **Standard label templates can be found on the Sustainability Operations Team SharePoint: <https://grpleg.sharepoint.com/sites/countries/LNCA/initiatives/sustainability/Operations/Forms/AllItems.aspx?viewpath=%2Fsites%2Fcountries%2FLNCA%2Finitiatives%2Fsustainability%2FOperations%2FForms%2FAllItems.aspx>**



Appendix F: Waste Audits

HOW TO CONDUCT A WASTE AUDIT

Use this flow chart and example spreadsheet to conduct a waste audit for your office.

ORGANIZE	COLLECT	SORT	ANALYZE
<ol style="list-style-type: none"> 1. Choose 2-3 people from your office to be in charge of the waste audit, from collecting/sorting the waste to analyzing the results. 2. Ensure proper safety measures are taken by the members of the waste audit team: gloves are used, masks are provided, EHS standards are followed, and no hazardous waste is handled. 3. Identify all waste disposal areas in the office and make sure they are clearly labeled. 4. Identify types of waste (waste streams) that will be collected and recorded. 5. Identify time period during which waste will be collected. 6. Record number of waste bins in office and number of office members. 	<ol style="list-style-type: none"> 7. Collect and label waste at the end of the day from each location. 8. Store waste in designated location until time period is over. <div style="text-align: center; margin-top: 20px;">  </div>	<ol style="list-style-type: none"> 9. Set-up sorting area by covering tables, scales, and arranging and labeling buckets. 10. Weigh and record each bag of waste that was collected during the time period. 11. Lay contents of bag out on table and sort waste into designated bins. 12. Weigh and record weight of each bin (subtracting weight of bin itself) in spread sheet like the one below. 13. Repeat process for each bag of waste, or groups of bags from same location. 14. Clean up area after all waste has been recorded. 	<ol style="list-style-type: none"> 15. Sum up all columns and rows of data to see which locations produce how much waste from each waste stream. 16. Identify how your office can improve waste diversion and reduction: <ul style="list-style-type: none"> Which waste streams contain the most mass? Are there other waste streams that were not accounted for that should have been? How much of the waste from your office is recyclable? Compostable? Reusable? What waste streams does your office currently have and which can you add? What size of bins does your office need for each waste stream? What signage can be posted to ensure waste is properly disposed of? Can your office become zero-waste/landfill free?

Appendix G: Composting

Although composting capabilities vary by location and region, site's considering implementing a composting program should follow the guidelines below to ensure the greatest opportunity for success.

1. **Determine what areas of the building will be included in the composting program**
 - It is not recommended that a compost bins be supplied to every employee – difficult to manage
 - Consider areas where the majority of food waste is being generated such as breakrooms and kitchenettes
 - If the site has a cafeteria, coordinate with kitchen staff on how a compost program could best be implemented in the back of the house
 - A pilot area (such as a single department) will help in identifying and solving problems before expanding to other parts of the facility

 2. **Estimate the amount of food waste you will be generating on site**
 - This can be done through a waste audit or a compost test day depending on the size of your facility
 - A compost test day is where you would set up a composting stream for a single day as if the program was already in place. At the end of the day, you can weigh the material to determine how much you would expect to generate on a daily basis
 - By having an estimate of the amount of food waste generated on a monthly basis, a calculation can be made to determine the improvement compost could potentially make to the site's diversion rate
 - Having an estimate also helps in service negotiations with potential vendors. They can get a better understanding of the volume being generated with an estimate as assistance.

 3. **Research available commercial vendors in your area**
 - *Compost Now* is a great website to search for composting vendors in your area: <https://compostnow.org/compost-services/>
 - Many regions in the U.S. still lack composting programs, but don't get discouraged! The composting industry is growing and it won't be long until the right service provider appears near you.
1. **Find a compost vendor in your area that will pick up compost on a periodic basis similar to landfill and recycling vendors.**
 - Service providers typically change by pick-up or a monthly rate.

- Service providers may provide the collection bins, or they may have to be purchased separately.
- Some service providers can supply the amount of weight hauled from site, if not, house keeping should weigh this waste to ensure it is captured in LNCA's waste diversion metrics.
- Ensure that you have determined all of the information in the above bullets if speaking to a vendor before making a decision.

2. Work with proper approval channels to secure composting service contract with selected

- Facility manager, General Manager etc.
- A cost analysis may be required in order to present the business case to facility leadership.

3. Training and Education

- Training and education is key. Most folks generally understand the concept of recycling, but compost can be intimidating to many people.
- Service provider may offer free training to employees, be sure to ask while negotiating contract.
- Making sure there are descriptive labels on the bins with pictures is important
- Emails and lunch and learns are great opportunities to show folks the proper way to compost.

Resources:

- <https://compostnow.org/compost-services/>
- <https://www.epa.gov/sustainable-management-food/reducing-impact-wasted-food-feeding-soil-and-composting>
- <https://compostingcouncil.org/resources/>

Appendix H: Identifying What Is Going To Landfill

Recycling Audits like we did during “Trash Madness”

- West Hartford performs factory wide recycling audits every 2 weeks
- Each department is scored and ranked
- Results reviewed at Gemba walk
- Spot checks also done as part of “Legrand Way” field tours by Plant manager and Leaders

Dumpster Dive

- Follow Dumpsters to recycling facility with a team (WH uses ISO14001 team)
- Dump them out in an open area at the waste facility
- Look through the contents of each identifying contamination
- Have people from different areas to identify where contamination came from



Appendix I: Waste Provider Relationship

1. What waste provider(s) do you currently have in place

- A good place to start is by contacting the waste providers you currently have in place
- Most of the account representatives have been in the waste/recycling industry for many years and either have waste stream options available, or they might be able to point you in the direction of a company to assist you with your recycling needs.
- It is best to bring in your account representative to discuss our goal of zero waste to landfill and take them on a facility tour to discuss all of your waste streams and ask them any material questions.
- Supply them with samples of different types of material you are sending to landfill.
- Set up bi-weekly conference calls. This will help with status updates on sample processing and action plans to improve.

2. Sourcing your recycling needs

- Investigate what packaging materials you are receiving from your vendors or suppliers. Work with Purchasing to obtain Material Data Sheets to help you identify what type of packaging material you are receiving.
- On the other side of sourcing your material. Do not be afraid to contact local recycling companies. Even if you do not know exactly what material you are recycling.
- Calling and or emailing companies is the best way to obtain immediate answers and arrange a visit to their facility. Bring plenty of samples.
- You may find that companies are not be able to support your recycling needs but may know of other local companies.
- Be sure to have open communication with your local recyclers. Discuss the logistics, contamination actions, and briefly meet a couple times a month. They are helping us to recycle and we are helping them by supplying them with free material.

3. Resources

- Review the materials SDS sheet to evaluate the materials composition and properly select vendors for disposing or recycling.
- Section 13 in the SDS provides insight as to disposing the material and even its container.
- Provides a description of its physical and chemical properties that may affect the disposal
- Instructions on any special precautions for landfills or incineration activities.
- Supply your vendors with this information to facilitate disposing or recycling.

Appendix J: Analyze Bin Placement

- Determine what size bins are adequate for what is being recycled
- Assign a designated space where the bins/containers will be placed
- Label each container with appropriate signage (Appendix E)



Appendix K: Future Considerations

A team has been assembled to develop and implement a comprehensive waste management strategy that will enable Legrand, North and Central America to meet its landfill waste diversion goals. As needed, this team will propose amendments to this policy in the future. Some topics that may be addressed are:

1. Addition of section on key terms relative to waste status and management practices
 - Zero Waste
 - Net Zero Waste
 - End of Life
 - End of Useful Life
 - Circular Economy
 - Cradle to Cradle
 - Product Stewardship
2. Feasibility of a monthly visual spot-check audit for all waste stream containers for all locations.
3. Employment of standardized labeling for all sites to model waste bin labels.
4. Outlining parameters for centralizing placement of all waste stream containers.
5. Changing current landfill waste reporting method to only consider ultimate ash waste to landfill after incineration in locations that utilize waste to energy.

REV.	ECO NO.	DESCRIPTION OF CHANGE	DATE EFFECTIVE
A		INITIAL RELEASE	11/20/14
B		UPDATED ALL "LEGRAND NORTH AMERICA (LNA)" TO LEGRAND NORTH AND CENTRAL AMERICA (LNCA)	10/1/18
B	1.1	OBJETIVE ADDED "TIERS OF WASTE DIVERSION"	10/1/18
B	3.0	POLICY	10/1/18
B	3.1	POLICY COMMUNICATION	10/1/18
B	4.3	RESPONSIBILITY	10/1/18
B	5.2	DEFINITIONS	10/1/18
B	5.3.2	ELECTRONIC WASTE "E-WASTE"	10/1/18
B	5.3.4	MEASUREMENT AND RECORDING SHAREPOINT WEBSITE	10/1/18
B	8.2.4	ANNUAL ASSESSMENTS	10/1/18
B		UPDATED ADDENDIX A	10/1/18
B		ADDED APPENDIX B	10/1/18
B		ADDED APPENDIX C	10/1/18
B		ADDED APPENDIX D	10/1/18
B		ADDED APPENDIX E	10/1/18
B		ADDED APPENDIX F	10/1/18
B		ADDED APPENDIX G	10/1/18
B		ADDED APPENDIX H	10/1/18
B		ADDED APPENDIX I	10/1/18
B		ADDED APPENDIX J	10/1/18
B		ADDED APPENDIX K	10/1/18