

Japanese Knotweed Solutions Ltd

WORKING ON BEHALF OF
Government Property Agency

Protocol for Invasive Non-Native Species Manchester Digital Campus

Prepared by:



Japanese Knotweed Solutions Ltd

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JKSL Ltd unless written approval granted*

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DATE	10-03-2025
REPORT REFERENCE	JK25-0229-250310-MP

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INTRODUCTION

Japanese Knotweed Solutions Limited (JKSL) has been instructed by PP O'Connor on behalf of the Government Property Agency to prepare a Protocol for dealing with invasive non-native species in respect of Manchester Digital Campus to satisfy planning condition 6 of planning consent 141607/FO/2024:

6) Save for site set up (including erection of hoardings, siting of cabins and securing of the site, and vegetation clearance), prior to the commencement of the Enabling Phase of the development, an invasive non-native species protocol for the Enabling Phase shall be submitted for approval by the City Council, as Local Planning Authority. This shall detail the containment, control and removal of wall cotoneaster the site within the Enabling Phase. The Enabling Phase shall be carried out in accordance with the approved protocol for the Enabling Phase of the development.

If any invasive non-native species are found within the vegetation clearance works as part of site set-up, works will stop until an invasive non-native species protocol has been submitted for approval by the City Council, as Local Planning Authority.

Reason - In order to deal with the invasive non-native species at the application site pursuant to policy EN15 of the Manchester Core Strategy (2012).

JKSL has used its understanding of the current legislation and recommended best practice in developing this Protocol.

MANAGEMENT PLAN OBJECTIVE

The objectives of this Protocol are to:

- Confirm how invasive non-native species will be removed from the site and disposed of correctly.
- Implement ongoing monitoring pre and post development.
- Ensure that all works specifically relating to the invasive plant species are carried out in accordance with the relevant laws and statutes.

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To ensure the above objectives are achieved, the following measures are to be implemented:

- Identify all areas of invasive non-native plant species situated within the development boundary;
- Implement biosecurity control measures for all contractors when working in close proximity of known infestations containing invasive non-native plant species, to minimise the risk of propagules (i.e. a vegetative structure that can become detached from the main plant and give rise to a new plant) being spread around site and off-site; and
- Implement an appropriate remediation strategy to facilitate the proposed development e.g. excavation and removal of invasive non-native plant species and impacted materials that are directly affected by the proposed development, and in-situ monitoring/treatment of impacted materials that are not affected by the proposed development.

COTONEASTER (General Information)

There are over 100 species of cotoneaster cultivated in the UK, five of which are listed as invasive non-native Schedule 9 plants under Section 14 of the Wildlife and Countryside Act 1981. These include Cotoneaster (*Cotoneaster horizontalis*), Entire-leaved Cotoneaster (*Cotoneaster integrifolius*), Himalayan Cotoneaster (*Cotoneaster simonsii*), Hollyberry Cotoneaster (*Cotoneaster bullatus*) and Small leaved Cotoneaster (*Cotoneaster microphyllus*).

Cotoneaster species are native to Eastern Asia and were first introduced to the UK in 1824 as ornamental plants. Cotoneaster plants in general tend to spread via seeds, which can be exacerbated further when eaten by birds.

Cotoneaster can create dense thickets, outcompeting other native flora and can vigorously spread.

Soil/materials containing Cotoneaster (*Cotoneaster sp.*) propagules are regarded as 'controlled' waste and should be disposed of at an appropriate licenced facility if

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taken off-site. Associated impacted materials should not be reused in further construction or landscaping without an appropriate remediation strategy being implemented.



SITE INFORMATION

The site comprises circa 2.0 hectares of land consisting of large areas of tarmac and concrete hardstanding associated with its former land use as a retail park (former Central Retail Park). Dense vegetation is situated along the northern, south and western boundaries of site (and also in some areas within the centre of the site).

The site is located in central Manchester and is accessed via Great Ancoats Street with a second access off Hugh Oldham Way (to the northeast of the site).

To the east of the site, the adjacent land is also the former retail park. The land to the north includes a school and New Islington Marina, to the south there is the main road (Great Ancoats Street) and the Rochdale Canal borders the western side of the site.

SITE DEVELOPMENT

The proposal for the site is to construct Manchester Digital Campus.

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The enabling works plan is attached at Appendix 1, which shows the extent of the site.

It is important that JKSL are provided with up-to-date information about site plans, including accurate site drawings and details of any additional planned works, particularly in any contaminated area. It is important to implement a Clean Site Policy (includes biosecurity control measures) and Management Plan as soon as practically possible.

As the works are to remove all of the Cotoneaster from site, any future developments shouldn't be affected.

SURVEY RESULTS

JKSL surveyed the site on 27th February 2025. The survey was undertaken by Gabriella Fagnani of Japanese Knotweed Solutions Limited (JKSL). The results as summarised below should be read in conjunction to drawing JK25-0229-01 (invasive weed location plan), attached at Appendix 2.

Cotoneaster

Five areas containing Cotoneaster (Cotoneaster sp.) were identified within the development boundary, denoted as CT1 - CT5 on drawing JK25-0229-01.

All areas of Cotoneaster appeared to be established and mature. Areas CT1, CT2, CT3 and CT5 were located within the planters present along the southwestern boundary of the site. Because these planters contained dense vegetation, the true extents of the CT were hard to determine, due to restricted access and viewing. Area CT4 was located within a planter just north of the southwestern boundary.

An additional area of Cotoneaster was identified on neighbouring land to the east, which has been highlighted on JK25-0229-01.

General information

The visible extent of an infestation may not accurately indicate the full extent of the area affected; concealed growth below ground level could be more extensive. Dense vegetation situated along the northern and southern boundaries, restricted

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viewing/access during the survey (denoted as DV on drawing JK25-0229-01). Additional areas of (underlying) invasive plant species could potentially be present within these areas, specifically within the planters along the southern boundary.

Areas of fly-tipping were noted during the survey along the boundaries of the site). Non-native invasive plant species are commonly fly-tipped because of the high costs of disposal. This means that there is normally a higher risk of non-native invasive plant spreading into site via this contamination pathway where this occurs, however it should be noted that the fly-tipped material did not appear to contain vegetation/soils.

Due to previous disturbance on site (includes demolition of previous buildings, movement of materials etc) propagules (i.e. a vegetative structure that can become detached from the main plant and give rise to a new plant) could have also been potentially spread around site and off-site, thus exacerbating the infestation problems further. As a result, additional areas of infestation may emerge in the future.

SITE PHOTOGRAPHS



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Area of dense vegetation along the northern boundary

Cotoneaster area CT1



Cotoneaster area CT2



Cotoneaster area CT2



Cotoneaster area CT3



Cotoneaster area CT4

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Cotoneaster area CT4



Cotoneaster area CT5



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Cotoneaster area CT5

Evidence of fly tipping along boundary

CONTAMINATION PATHWAYS

“Contamination Pathways” are routes by which a contaminant can spread into or out of a site – for the recorded Cotoneaster, this could include movement of soils or other plant materials. JKSL’s surveyor has identified the following current contamination pathways in the course of the survey.

Pathway	Notes
Disturbance activities	There was evidence that previous disturbance activities had taken place on site, which could result in potential cross contamination and new areas of infestation could potentially emerge in the future.
Propagule Spread (outward)	Due to the location of Cotoneaster area CT1, CT2, CT3, and CT5 situated next to the boundary, associated propagules could potentially migrate onto neighbouring land from the development site should an appropriate remediation strategy not be implemented.
Propagule Spread (inward)	Cotoneaster on site could potentially migrate into site should an appropriate remediation strategy/treatment programme not be implemented.

INVASIVE NON-NATIVE SPECIES RISK ASSESSMENT

Based on the survey results, this section of the report outlines the risk factors and level of risk of cross-contamination via the contamination pathways identified. The risk assessment has then been used to inform the Recommended Remediation Option.

The table below outlines potential negative consequences associated with the

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Cotoneaster, and how it could spread in and out of the site. A "Risk Level" of "Low / Mid / High" has been included to quantify each risk factor's likelihood of cause damage or cross-contamination on site. A "Low" risk might not cause problems in the short term even if the plant is not treated, a "Mid" risk is likely to cause problems without treatment and a "High" risk is very likely to cause problems. The "Distance" specifies how far the risk factor is from the nearest surface growth. Because of the plant's extensive root system, anything within 7m could potentially be at risk. Anything that is less than an unobstructed 4m away from mature plants is likely to be inside the root network.

It is recommended that treatment is started as soon as possible, as this will minimise the spread of the plant and we understand that this is the intention of the Government Property Agency. Implementing an invasive non-native plant species management plan immediately (and communicating it to all contractors on site) will reduce the chance of cross contamination during other works on site.

Risk Factor	Distance	Risk Level	Description
Ground disturbance during construction phase associated with the future redevelopment (future risk)	Within development boundary	High	Should no appropriate treatment and/or control measures be implemented, future ground disturbance activities during the construction phase of the development where operatives, and machineries move in and out of the contaminated areas, are likely to cause propagules to be spread around site (and potentially offsite), thus exacerbating the infestation problem further.

Risk Factor	Distance	Risk Level	Description
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Other human activity (future risk)	0m	High	Ongoing grounds maintenance / landscaping activities associated with the future re-development of the site where people move in and out of the contaminated areas, and potentially disturb the soils containing propagules. Should no appropriate treatment and/or control measures be implemented, these human activities can potentially cause the plant to spread.
Infestations near site boundary (on site)	0m	High	The infestations on site are at risk of spreading to neighbouring land – this could potentially result in the Wildlife and Countryside act being compromised, if “reasonable measures” are not in place to control the spread and reduce the viability of the invasive plants. Having a Management Plan in place is an important part of preventing the invasive plants from spreading
Seed spread via birds, etc	0m	High	The infestations on site are at risk of spreading via birds transporting their seeds and dropping them (as well as in their faeces) at another location on site.
Fly-tipped material	Within development boundary	Low (at this stage)	Areas of fly-tipping were noted during the survey. Cotoneaster and other non-native invasive plant species are commonly fly-tipped because of the high costs of disposal. This means that there is normally a higher risk of non-native invasive plant spreading into site via this contamination pathway where this occurs, however it should be noted that the fly-tipped material did not appear to contain vegetation/soils (and therefore risk is considered to be low at this stage).
Risk Factor	Distance	Risk Level	Description

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Made ground	0m	High	Due to the nature of the made ground situated within the development boundary (as also confirmed within the ground investigation report), there is potential for other areas of the site to contain buried invasive plant species propagules, which could potential result in additional areas of infestation to emerge in the future.
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IMPACTS ON DEVELOPMENT PLANS

Drawing JK25-0229-02 attached at Appendix 3 shows that all areas of infestation situated within the development boundary, will be directly affected by the proposals. Hence, there is a need to remove the infestations and minimise the risk of the spread of propagules at the commencement of the works, which is the proposed approach being adopted by the Government Property Agency.

Construction activities (includes ground disturbance works) will likely exacerbate the infestation problems further, and there is a high risk that this will then cause the spread of propagules around site, and potentially off-site, should an appropriate remediation strategy not be implemented.

It is important that JKSL are provided with up-to-date information about site plans, including accurate site drawings and details of any additional planned works, particularly in any contaminated area. It is important to implement a Clean Site Policy and Management Plan as soon as practically possible.

RECOMMENDED REMEDIATION OPTION

Based on the site layout and taking in to account the survey results, contamination pathways and invasive species risk assessment, mechanical remediation is recommended as the most effective option. This involves excavation and disposal of excavated materials off-site at an appropriate licenced facility. JKSL will complete a

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watching brief for the excavation works and complete the haulage and disposal of the Cotoneaster sp to an appropriate licenced facility. The excavation will include

Drawing JK25-0229-02 attached at Appendix 3 shows the anticipated extents of excavation.

Appendix 4 details the method statement / safe system of works which will be implemented during the excavation and off-site disposal of Cotoneaster sp and impacted materials.

All Cotoneaster impacted material will be removed from site.

All of the above proposed work will be undertaken by a suitably qualified and experienced specialist, who is a member of an appropriate trade body, such as the PCA and/or INNSA.

To minimise the risk of propagules being spread around site and off-site, a clean site policy (includes biosecurity control measures) will be implemented by all operatives. This will include -

- Prior to the relevant works commencing, all operatives on site will be made familiar with the extents of infestations as shown on enclosed drawing JK250229-01 (appendix 2). Should any additional infestations be identified (e.g. during the initial clearance of vegetation within the development site), works in that area should be immediately stopped and the management plan will then be updated accordingly.
- Should the risk of disturbance be considered to be high within areas of site impacted by invasive plant species (prior to the remediation works being undertaken), the area(s) of infestation will be fenced off with signage, including a 2-3m exclusion zone.
- During works a foot wash and/or an inspection point will be installed with a small area of geotextile root barrier on the ground for site personnel and equipment will be checked and decontaminated on leaving the contaminated area. Signage will also be installed at the edge of the contaminated area.

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- Any machine, equipment or personnel leaving the buffer zone/exclusion zone at any point will need to undergo decontamination. All equipment (such as machine buckets) and tools (shovels, spades) used within the contaminated area shall be suitably decontaminated prior to each occasion that it leaves the contaminated area. Equipment should be visually checked, and any potential impacted spoil material should be placed back within the original area of infestation or disposed off-site at an appropriate licenced facility (or placed within a temporary waste management area, as mentioned below). Anything which has been used to cut or dig in impacted materials shall be cleaned thoroughly. At this stage, it is JKSL's understanding that the tracks/wheels of any machines will not come into contact with associated impacted materials, and will be situated within an appropriate location, situated outside the area of infestation (includes outside the associated buffer/exclusion zone, if/where applicable).
- A temporary waste management area (lined with an appropriate membrane) may be created to reduce the risk of cross-contamination occurring while temporary stockpiling impacted soils on site (where applicable/required), or the impacted materials can be placed on an existing area containing impacted materials within immediate surrounding areas on site, prior to the impacted materials leaving site to be disposed of at an appropriate licenced facility.
- Due care should be taken not to spill excavated impacted materials outside the contaminated area. During and upon completion of the excavations, the haul route(s)/working area(s) should be inspected for spillages of contaminated materials. All contaminated materials will be cleared using a combination of brushes, spades and shovels, and then deposited within the area of contamination. Vehicles used to transfer waste should not be overloaded, to avoid any cross-contamination issues, and the associated wheels/tracks should not come into direct contact with any impacted materials. If the wheels/tracks of any vehicle enter any contaminated zone, the wheels/tracks will be cleaned off using a combination of brushes, spades, shovels and a jet-wash prior to the vehicle leaving the contaminated area. Contaminated materials will be loaded on to the vehicle or replaced in the contaminated area.

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- All impacted materials being disposed off-site is to be disposed of at an appropriate licenced facility. Copies of the waste transfer information (includes individual waste transfer notes, hauliers waste carriers' licence and permit of the disposal facility) will provided to the Client, to demonstrate that any impacted materials taken off-site has been disposed of correctly. All wagons leaving site (carrying impacted materials), will not leave site until their cover is secured in place.
- Relevant information should be saved within the project folder, such as the description of completed works, photographs of the completed works, completed excavation drawing(s), and copies of the waste transfer information provided.

In the meantime, all areas containing the Cotoneaster sp. will not be disturbed (includes a circa 2-3m exclusion zone), to further aid in preventing propagules being spread around site.

MONITORING

Monitoring will be carried out by the Site Foreman and/or Site Operatives prior to any treatment/remediation works being carried out. The initial works on the site should be signed off upon completion by the appointed representatives of both JKSL and the client.

Upon completion of proposed mechanical remediation works, a completion report will be issued which will outline the summary of works that have been undertaken, photographs of completed works, completed excavation drawing, confirmation of duration/period of works, and copy of the sign-off sheet.

As part of on-going monitoring and potential re-treatment of Cotoneaster sp on immediate neighbouring land, inspection reports will be issued to the Client upon completion of each monitoring/treatment revisit which will include the following information:

- Date/time of visit
- Name of operative who completed the visit

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- Summary of findings, including maturity and density of potential re-growth within the treatment area, as well as other relevant information (e.g. a new feature that might impact on the effectiveness of the management plan or increase the risk of spread or re-infestation)
- Spray record (includes herbicide application and weather condition)

It is recommended that there are 2 no. consecutive growing seasons that show no evidence of re-growth within the affected area to demonstrate that the programme has been successful.

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APPENDIX 1
Enabling works site plan

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APPENDIX 2



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APPENDIX 3

Drawing JK25-0229-01

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APPENDIX 4



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APPENDIX 5
Drawing JK25-0229-02

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APPENDIX 6



Disclaimer:
This drawing is for information only and does not constitute a contract. It is the responsibility of the client to ensure that the information is accurate and up-to-date.

- Area of Knotweed Surface Growth
- Estimated Excavation Area
- DV Dense Vegetation
- Site Boundary



SURVEY ORIENTATED TO MAGNETIC NORTH

Date	Description	Drawn	By	CHK
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Client
PP O'Connor

Contract
GPA Manchester Digital Campus

Drawing
Estimated excavation extents of
Knotweed



Drawing No.	JKS-0228-02	Revision	/
Scale	NTS	Date	05/03/2025
Drawn	GP	Checked	AD

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APPENDIX 4

Method Statements/safe system of works for main excavation-removal works



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SAFE SYSTEM OF WORK: Watching Brief on Client's CT Removal Works

Client: PP O'Connor

Site Address: GPA Digital Campus, Manchester

LAST REVIEW / UPDATE: 04/01/2024 **REVIEWED BY:** Simon Prato-Scarlett

NEXT REVIEW BEFORE: 01/05/2025

INTRODUCTION

JKSL recommend that any works in contaminated areas are carried out with a member of JKSL staff on hand in order to maintain a clean site and prevent cross-contamination. Number of JKSL staff will depend on the complexity of the operations and will be listed in the site-specific Method Statement.

This safe system of work covers the activities of JKSL staff on site during excavation and removal of materials, including implementing a Clean Site Policy and carrying out the decontamination of machinery used during the works. This document does not include use of a jet wash.

HEALTH AND SAFETY

This document covers the task only and should be read with JKSL's Health and Safety Manual, site-specific Method Statement and Risk Assessment(s) and the contractor's RAMS.

Because the main element of the works will be managed by the client or their contractor, JKSL personnel will attend an induction before starting works and will comply with the health and safety requirements of the client and/or contractor.

JKSL's Site Foreman should report any health and safety concerns on site to the client's Site Manager at the earliest opportunity, as well as reporting concerns to the JKSL office.

The manual handling required for this specific task is expected to be minimal.

Particular areas for concern include:

- Safety of excavation operations and plant movement
- Safety of excavations (should be inspected by the client daily)
- Noise levels in working areas

EQUIPMENT

The following equipment is required for this task:

- Hand tools for decontamination (normally spade, shovel and stiff brush)
- Footwash

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Depending on the job, temporary fencing and signage may be installed and root barrier membrane may be installed to prevent cross-contamination. This will be outlined in the site-specific Method Statement and additional task-specific method statements provided.

The site-specific RAMS will specify what PPE is to be used, but the minimum PPE required for this task is:

- footwear with protective toe and mid-sole [EN ISO:20345],
- high-visibility vest, coat or tabard [EN ISO:20471]
- hard hat [EN397]

The following PPE may be required for this task:

- eye protection [EN166]
- gloves [EN388]
- high-visibility trousers [EN ISO:20471]
- hearing protection [EN 352]

The client / contractor must provide all appropriate plant and equipment required (e.g. excavators and dumpers) as required, as well as competent operators for this machinery; they must also provide CAT scan equipment and competent operator(s).

PREPARATION

JKSL's Site Foreman will make sure all JKSL staff get an induction or site briefing from the client or contractor before starting works. JKSL will brief anyone working in contaminated area(s) about the Clean Site Policy and any other invasive-species-related issues.

JKSL's Foreman will check with the contractor that a survey and CAT scan has been carried out in order to find any underground and/or overhead hazards present in the working area.

A foot wash (and sign, if needed) will be placed at the entry point to the contaminated area; this must be used by any person when leaving the contaminated area.

It is expected that all areas where material is to be excavated, areas to be avoided and all site boundaries in the working area will be clearly indicated by the client / contractor.

CLEAN SITE POLICY

In order to minimise the potential for cross-contamination due to the works in contaminated areas, all works must be undertaken in line with JKSL's biosecurity control measures as outlined within the Invasive Plant Species Management Plan and site specific method statement.

JKSL or the client / contractor may fence off contaminated areas; signage may also be installed at the edge of the contaminated area. JKSL will (in most cases) install a foot wash and/or an inspection point (including a section of geotextile membrane) where personnel and equipment can be checked and decontaminated.

Any machine, equipment or personnel leaving the exclusion zone must undergo decontamination (as outlined below).

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A geotextile-lined waste management area may be created to reduce the risk of cross-contamination while stockpiling the soils on site.

WATCHING BRIEF ON EXCAVATION (AND RELOCATION)

JKSL will follow any safety requirements outlined by the client and will be present during the excavation works.

JKSL's Operative(s) would normally stand by during the excavation works, either in or adjacent to the excavations (but outside the swing of the machine) in order to visually check for signs of invasive species. JKSL can also be present in loading / waste management areas in order to ensure that potential for cross-contamination is minimised.

At all times, JKSL's works will be limited to advising the client / contractor on invasive species matters. JKSL will not operate plant, machinery, tools or CAT scan equipment.

DECONTAMINATION

Any equipment or tool must be decontaminated before each time it leaves a contaminated area. Equipment should be visually checked and any soils or plant materials removed. A combination of brush(es), spade(s) and shovel(s) will be used to clean larger items, e.g. excavators, simply removing all potentially contaminated soils from the outside of the machine and the cab and replacing this material in the contaminated area. Jet wash will not normally be used to decontaminate equipment or plant, due to the potential for materials to be spread around the site.

Any person who has entered the contaminated area should use the foot wash as instructed, each time before they leave a contaminated area.

On completion of the excavations, JKSL Site Operative(s) will check the following areas and check for any cross-contamination, including spillages of contaminated material:

- original contaminated areas
- excavation areas
- haul route(s)

Before leaving site, JKSL will decontaminate and remove the footwash, inspection area and all other JKSL equipment that has been used in a contaminated area, to prevent cross contamination. Any equipment or plant belonging to the client must be decontaminated, but this can be done either by JKSL or by the client, depending on contract agreement.

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