

# eauc case study

**CLASSIFICATION:**  
**Waste**  
**SUB CLASSIFICATION:**  
**Strategy**

TITLE:

## Implementing the Hazardous Waste Directive

DATE:

April 2007



INSTITUTION PROFILE

HE

12,500 FTE students

2,500 staff

Urban

14 buildings

### SUMMARY

The introduction of the Hazardous Waste Directive in July 2005 brought new obligations for sites producing 200kg of hazardous waste each year.

Most University of Derby sites would be affected, so it decided to investigate the wider implications of the legislation and the potential impact it would have across all faculties and departments.

### EAUC COMMENT

A good example of a risk based approach being taken and the value of timely external consultancy. Staff development for senior managers, technicians and the newly installed Departmental Hazardous Waste Representatives has shown the importance in raising staff awareness and understanding of such new and demanding environmental legislation.

## PROJECT PARTNERS

EAUC, SLR Consulting

## THE PROBLEM

The introduction of the Hazardous Waste Directive meant that any site producing over 200kgs of hazardous waste each year needed to register with the Environment Agency and keep track of their waste. The Directive imposed tighter regulation of hazardous waste and a change in the way waste is managed, meaning an increase in risk university-wide.

Hazardous waste must be managed internally rather than relying on external contractors so staff needed educating about what hazardous waste is.

Other responsibilities imposed by the legislation include being able to produce evidence that staff are appropriately trained and demonstrate that hazardous waste is managed correctly.

## THE APPROACH

The Environmental and Energy (E&E) Manager worked with consultants and the hazardous waste contractor to devise a system for hazardous waste. The university accepts producer responsibility for ensuring waste is coded correctly but allows the contractor do this on its behalf.

The E&E Manager risk-assessed the impact of the new regulations, drafted guidance outlining staff obligations and developed a risk register.

Senior management agreed to fund a consultant to audit the university's hazardous waste following the presentation of the risk register to them. Each faculty nominated someone to be responsible for their hazardous waste. The University Environment Office supports them by providing regular updates on the legislation, guidance, training and proposed actions.

## GOALS

- Comply with the legislation. Identify and minimise any risks to the university, including centralising the relevant paperwork so it is easy to keep track of
- Recruit nominated responsible people in each faculty/department then provide training and communicate clearly with them about their responsibilities
- Identify and manage the amount of money the process costs
- Ensure each faculty has a list of actions needed in order for it to comply with the legislation
- Use expertise of contractors and consultants and regularly audit to ensure obligations are being met

## OBSTACLES AND SOLUTIONS

- People not taking the new legislation seriously
- Lack of understanding and training
- Lots of little bits of hazardous waste to deal with
- Delegating responsibility
- Understanding the technical issues with mirror entries and coding of waste
- Awareness programme and support from senior management
- Formal proactive as opposed to minimal reactive training
- Robust systems, tight management and regular audits
- Support of senior management for a network of faculty/department representatives
- Use consultants or suitably trained staff to undertake these jobs

## PERFORMANCE AND RESULTS

After 18 months of work, the E&E Manager is satisfied the university is progressing towards full compliance and meeting its obligations.

An audit of all waste streams, their storage, labelling and management has been completed.

Senior management are aware of the university's obligations and the risks if these are not met – individuals responsible for breaches could be fined up to £5,000 and the university may face naming and shaming publicly by the Environment Agency.

Special storage areas have been created and labelled. Guidance on handling hazardous waste has been distributed, and the team of hazardous waste representatives is in place and working well.

## LESSONS LEARNT

The E&E Manager needed to be proactive - staff will not voluntarily deal with hazardous waste.

It is difficult to ensure that hazardous waste is always disposed of properly. A widespread education initiative is needed to complement the network of department representatives.

Training is essential to maintain continuity and keep updated records.

Dealing with these obligations is time-consuming and therefore expensive. The team needed to be supported with extra resource in order to absorb this task.

The answer is not simple. The geography and location of the site and the quantity of hazardous waste it deals with all need to be considered before deciding on the best strategy.

## FURTHER INFORMATION

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