



**FAO:** All staff dealing with/responsible for those dealing with the handling and collection of ANY and ALL waste for disposal from site e.g. by waste management contractors/carriers. This includes all staff responsible for receiving/signing the required waste transfer/consignment notes and maintaining these records (Records Manager).

## INTRODUCTION:

This briefing covers the University's legal obligations and the duty of care required of its staff members when transferring waste. It covers recent changes in waste management regulations and updates in these obligations from **28<sup>th</sup> September 2011**. Non-conformance with these obligations could not only result in legal consequences but would also impact on the effective operation of the University's Environmental Management System. Compliance with these waste transfer obligations will be audited as part of the University's ISO14001 certification on a regular and ongoing basis.

## DUTY OF CARE:

Any person arranging the disposal of waste from the UoG has a duty of care to ensure that every load of waste that is transferred to others is covered by a **waste transfer note** and in the case of hazardous waste, a **consignment note**.

You must:

- Ensure the organisation that you are passing the waste to is an authorised waste carrier and retain a copy of its waste carrier registration for reference.\*
- Ensure the waste goes to a suitable site which is licensed or exempt from licensing and retain a copy of premises/company licences or exemption details for reference.\*\*
- Ensure that waste transfer/consignment notes are complete, co-signed by UoG and the carrier, and are completed fully and correctly including European Waste Catalogue (EWC) codes etc.
- Retain the waste transfer notes for at least **2 years** and consignment notes for **3 years** as per legal requirements.

\*Those responsible for passing on waste should maintain a complete spreadsheet of waste carriers and brokers used recording all of their licence numbers and expiry dates of their waste carrier registrations.

\*\* Those responsible for passing on waste should maintain a spreadsheet of all destinations up to and including the final destination of all waste streams and licence numbers or exemption details of these premises.

All staff responsible for retaining waste transfer notes and consignment notes should use the spreadsheet (relevant to their campus) at [Appendix 1](#) to meet these requirements.

## CHANGES TO WASTE TRANSFER / CONSIGNMENT NOTE REQUIREMENTS:

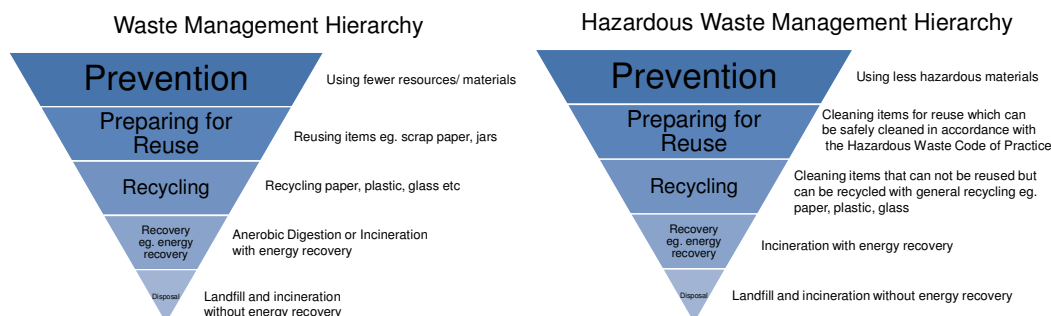
From **28 September 2011**, the following changes to waste management come in to effect:

1. Whenever the University transfers waste to someone else, it will have to declare on the **waste transfer note**, or **consignment note** for hazardous waste, that it has applied the **waste management hierarchy** before transferring waste.

This means that anyone who produces, handles or manages waste must take all reasonable steps to manage waste in order of preference by:

- (i) prevention;
- (ii) preparing for re-use;
- (iii) recycling;
- (iv) other recovery (for example energy recovery);
- (v) disposal.

Please refer below to waste hierarchy diagrams with practical examples for general and hazardous waste management.



- The University must also include on the **waste transfer note** the 2007 Standard Industrial Classification (SIC) code of the organisation transferring the waste, which will be the code for Tertiary Education namely **P85.42**

The University should continue to use the 2003 SIC codes on hazardous waste **consignment notes**, which refers to the processes that created the hazardous waste that is described in the note. In most cases this will be Tertiary Education namely **M80.30** but please feel free to contact Alyssa Terrell (ex.7942) for help with other waste streams that do not fit in to this bracket.

### 3. **Hazardous waste only**

Consignment notes are currently required to specify all hazards appropriate to all hazardous waste disposed of, using hazardous properties codes. A new hazardous code H13 “sensitising” has been introduced and takes the place of the previous H13 code, which has been moved to H15:

“H13 “Sensitizing”: substances and preparations which, if they are inhaled or if they penetrate the skin, are capable of eliciting a reaction of hypersensitization such that on further exposure to the substance or preparation, characteristic adverse effects are produced. [As far as testing methods are available].

H15 Waste capable by any means, after disposal, of yielding another substance, e.g. a leachate, which possesses any of the characteristics above.”

Information on hazardous waste assessment and including a list of all of the hazard codes in use is available on the Environment Agency website <http://publications.environment-agency.gov.uk/PDF/GEHO0411BTQZ-E-E.pdf>

## **ACTIONS REQUIRED:**

When transferring waste:

- Check that the organisation taking the waste is authorised to carry this type of waste by requesting a copy of their registration certificate and retain this for your records. Fill out the spreadsheet at [Appendix 1](#) with waste carrier registration numbers and expiry dates. If they are not able to produce their registration, contact the Environment Agency on 03708 506 506.
- Check that the site(s) that the waste is transferred to is permitted to receive this type of waste (or is exempt from licensing) by requesting a copy of their licence/permit and retain this for your records. Fill out the spreadsheet at [Appendix 1](#) with waste site registration licence numbers and expiry dates or exemption details for all destinations up to and including the final destination of all waste streams.
- The Environment Agency public register contains details of all waste carrier/broker/dealer registrations and also has details of all waste management licensed/environmental permitted sites. This is the only way of ensuring that a given waste carrier is still currently registered (as registrations can be revoked by the Agency). The public register is available on <http://www2.environment-agency.gov.uk/epr/search.asp> [When searching for waste carriers or brokers select the appropriate public register. When searching for landfill site registrations search the Environmental Permits (WML) register (Waste Management Licences) and for incineration sites Environmental Permits (IPPC) or Environmental Permits (IPC)

(integrated pollution (prevention) control). If the companies or sites do not appear on these public registers please contact the Duty of Care team at the Environment Agency to search its up-to-date registry by email to [dutyofcare@environment-agency.gov.uk](mailto:dutyofcare@environment-agency.gov.uk) including details of the company name, address and your contact details.]

4. Obtain a waste transfer note or consignment note (hazardous waste) - this must include a description of the waste and be signed by both you and the waste carrier.

Ensure that from **28<sup>th</sup> September 2011** the transfer note/consignment note includes a declaration to indicate that the waste management hierarchy has been applied, also ensure that the correct SIC codes are included and hazardous properties correctly described for hazardous waste (as above).

For further guidance please refer to:

Appendix 2 - example of an up-to-date annual waste transfer note from Bywaters with new requirements highlighted

Appendix 3 - updated waste transfer note template from the Environment Agency with annotation explaining new requirements

Appendix 4 - updated consignment note template from the Environment Agency with annotation explaining new requirements

Appendix 5 – 2007 SIC codes to be used in new waste transfer notes

Appendix 6 – 2003 SIC codes to be used in new consignment notes.

5. Keep your waste transfer notes for a minimum of 2 years and consignment notes (hazardous waste) for a minimum of 3 years and record the location of these in the spreadsheet at Appendix 1.

## **FURTHER INFORMATION**

The Environment Agency website provides useful guidance on Duty of Care obligations and up-to-date waste transfer / consignments note templates which may be used as appropriate:

Non-hazardous waste collection (general refuse and recycling):

Guidance for waste transfer notes:

<http://www.environment-agency.gov.uk/business/topics/waste/40047.aspx>

Hazardous waste collection:

Hazardous Waste consignment note guidance:

<http://publications.environment-agency.gov.uk/PDF/GEHO0311BTPW-E-E.pdf>

If you have any further questions please contact Alyssa Terrell (ext. 7942) or [a.terrell@gre.ac.uk](mailto:a.terrell@gre.ac.uk)

## APPENDIX 1: Waste carrier and destination registration records

All staff responsible for retaining **waste transfer** and **consignment notes** should fill in the spreadsheet relevant to their campus and save it in its current location (link below). Please refer to the Medway campus spreadsheet for an example of how this should be completed.

In each spreadsheet, the tabs should be used as follows:

Non-hazardous waste:

- Tab 1: Non-hazardous waste carrier registration details
- Tab 2: Non-hazardous waste destination permit/licence details (waste description data automatically updates from tab 1)

Hazardous waste:

- Tab 3: Hazardous waste carrier registration details
- Tab 4: Hazardous waste destination permit/licence details (waste description data automatically updates from tab 1)

Medway campus:

[\\Ah-share1\share\DFM\Domestic\\_Bursar\Estates\Waste\Waste records\Medway waste records.xls](\\Ah-share1\share\DFM\Domestic_Bursar\Estates\Waste\Waste records\Medway waste records.xls)

Avery Hill campus (inc. Woolwich site):

[\\Ah-share1\share\DFM\Domestic\\_Bursar\Estates\Waste\Waste records\Avery Hill waste records.xls](\\Ah-share1\share\DFM\Domestic_Bursar\Estates\Waste\Waste records\Avery Hill waste records.xls)

Greenwich campus:

[\\Ah-share1\share\DFM\Domestic\\_Bursar\Estates\Waste\Waste records\Greenwich waste records.xls](\\Ah-share1\share\DFM\Domestic_Bursar\Estates\Waste\Waste records\Greenwich waste records.xls)

## **APPENDIX 2: Annotated example of new waste transfer note from Bywaters**

Please refer to attached example of a waste transfer note to be used from 28<sup>th</sup> September 2011 or in relation to any waste collected after this date (eg. including waste covered by annual waste transfer notes signed before this date). All changes from the previous Bywaters waste transfer note are highlighted in **yellow**.



Duty of Care New  
for Sept 2011.pdf

### **APPENDIX 3: Annotated example of new waste transfer note issued by the Environment Agency (Aug 2011)**

Please refer to attached example of an updated waste transfer note from the Environment Agency with new requirements as of 28<sup>th</sup> September 2011 highlighted in **yellow** with explanatory notes.



Annotated EA  
waste transfer note

Also available for use as an electronic form on the Environment Agency website:  
[http://www.environment-agency.gov.uk/static/documents/Business/Waste\\_transfer\\_note\\_e-form.pdf](http://www.environment-agency.gov.uk/static/documents/Business/Waste_transfer_note_e-form.pdf)

#### **APPENDIX 4: Annotated example of new consignment note issued by the Environment Agency (April 2011)**

Please refer to attached example of an updated consignment note from the Environment Agency with new requirements highlighted in **yellow** with explanatory notes.



Annotated EA  
Consignment Note

**To note:** If only small amounts of hazardous waste are being collected, carriers may decide to run multiple collection rounds which are collections from more than one premises by the same vehicle in the course of the same journey, delivered to the same consignee. Previously, there were separate consignment note formats for single and multiple collection rounds. The Environment Agency has now combined these forms. However, if the carrier is operating a multiple collection round, it must ensure it provides on the consignment note both the round reference number and the number of collection sites covered by the round.

Available for use for standard and multiple collection rounds from the Environment Agency website:  
[http://www.environment-agency.gov.uk/static/documents/Business/HWCN01v111\\_paper\\_final\\_April\\_2011.pdf](http://www.environment-agency.gov.uk/static/documents/Business/HWCN01v111_paper_final_April_2011.pdf)

## APPENDIX 5: 2007 Standard Industrial Classifications (SIC)

To be used in new **waste transfer notes** to describe the industry/ business of the organisation transferring the waste



SIC 2007  
explanatory notes



## APPENDIX 6: 2003 Standard Industrial Classifications (SIC)

To be used for new **consignment notes** to describe the process that gives rise to the hazardous waste.



SIC 2003  
explanatory notes