

Briefing on Hazardous Waste Reporting - Feb 2018

The following briefing applies to waste wood reprocessors and describes the procedure to follow in the event that hazardous material arrives on site amongst a waste wood load.

All loads will be visually inspected when received and tipped.

All actions must be carried out in consideration of the individual site's HSE rules.

Should any hazardous material be seen (telegraph poles/railway sleepers/gas bottles etc.), then this item/s must be immediately rejected, removed from the load, weighed and held to one side. The rest of the load can then be moved to the correct wood pile for processing.

The delivery driver must be held whilst the Waste Supplier is contacted.

The **waste supplier must be called** and it is **their responsibility to decide**:

1. Do they want to have the identified hazardous material returned to them (if they are authorised to accept it) or delivered somewhere that is authorised to receive it, using the vehicle currently on site.
2. Do they want to collect within 24hrs the identified hazardous material and return it to their site (if they are authorised to accept it) or deliver it to somewhere that is authorised to accept it on their behalf.
3. Do they want the reprocessor to remove the identified hazardous material and dispose of it to an authorised outlet on their behalf and to invoice them for this service. To return the material to the source, or indeed deliver on, there will be a reporting, haulage and disposal cost which is chargeable to the supplier.

Should the identified hazardous material be brought on site by your own vehicles, then as above you must call the supplier and inform them of the identified hazardous material. Again, they must state how they want their material to be dealt with.

If you are unable to get hold of the waste supplier, the EA have accepted that small quantities of hazardous waste can be quarantined and held on site whilst direction is sought from the waste supplier regarding onward disposal. This should be a temporary arrangement only. The expectation of the EA is that we will proactively liaise with the waste supplier to agree the next steps, evidence of the communication between the site and the waste supplier should be retained to demonstrate this if the material is to be held on site for any period of time.

Failure by the waste supplier to consign the identified hazardous material within 48 hours will result in the reprocessor having to inform the EA of a failure to follow this procedure by the supplier.

The waste supplier must raise a new Consignment Note covering the movement of the identified hazardous material to the intended destination as per the list above; the new consignee must be informed of why it was originally rejected. The consignment note will cost £10 (electronic return) or £19 (paper return), and will be invoiced by the EA when the supplier submits their quarterly consignee return. The consignment note must include the course of action above and the new EWC code. There are 4 main hazardous waste codes related to wood:

EWC Code	Description
03-01-04*	Sawdust, shavings, cuttings, wood, particle board and veneer containing hazardous substances (wastes from wood processing and the production of panels and furniture)
17-02-04*	Glass, plastic and wood containing or contaminated with hazardous substances (construction and demolition)
19-12-06*	Wood containing hazardous substances (waste treatment, mechanical process)
20-01-37*	Wood containing hazardous substances (municipal wastes)

Once the waste supplier has decided what is happening with the material they **must** do **both** of the following:

- tell the carrier/reprocessor what to do with the waste
- telephone the Environment Agency on 03708 506 506 to tell them what has happened and what they have decided to do

Alternatively, you could raise a consignment note for the onward movement of the waste on the supplier's behalf, and invoice them accordingly for the service. However, the onus is still on the waste supplier to determine the end destination for the material and to report it to the EA.

You must also make a call to the EA and let them know that you have received and rejected the hazardous material. At this point, and in preparation for completion of the quarterly Consignee Return, you will also need to raise a consignment note to record the reject (using the EWC codes referenced above and information as described in the guidance below) – a copy of which should be sent to the waste supplier and the carrier (if not on your vehicle).

At the end of each quarter you will need to declare the total tonnage of hazardous waste rejected on a consignee return. A quarterly return will also need to be sent to the waste supplier, for information. On submission of the consignee return, the Environment Agency will invoice you for any consignment notes that we have raised on behalf of a 3rd party, there is no charge for reject notes or for the consignee return itself. Similarly, the waste supplier has a duty of care to submit their own consignee return.

You need to inform all wood waste suppliers of this policy in advance. This is the procedure that should already be in place with suppliers, and currently the practice of just returning the hazardous material will have to cease as the EA require full transparent declaration in accordance with their policies as detailed in:

<https://www.gov.uk/guidance/hazardous-waste-consignment-note-supplementary-guidance>

<https://www.gov.uk/guidance/hazardous-waste-returns-supplementary-guidance>

<https://www.gov.uk/guidance/hazardous-waste-rejected-loads-supplementary-guidance>

This procedure is for all Hazardous waste not just wood.

Waste Supplier = Originator of the waste i.e. HWRC site, skip company, waste management company.

Waste reprocessor = Wood recycler, panel board mill, biomass plant

Haulier = Own transport, skip company, 3rd party hauliers

Consignment Note = www.gov.uk/government/publications/hazardous-waste-consignment-note

Consignee Return = [Hazardous waste: consignee returns spreadsheet - GOV.UK](https://www.gov.uk/guidance/hazardous-waste-returns-supplementary-guidance)

Quick Guide:

1. All loads will be inspected as tipped
2. Hazardous material needs removing, weighing, recording and reporting as soon as it's identified.
3. The supplier of the hazardous material needs to decide what happens next while the driver is still on site. All actions are at the supplier's cost:
 - a. **Return it on delivery vehicle to supplier or alternative site immediately**
 - b. **Collect it and return it to supplier or alternative site within 24 hours.**
 - c. **Ask reprocessor to dispose, raise paperwork and charge supplier.**
4. A consignment note needs to be raised by the supplier to confirm above action and must be seen by the reprocessor.

There are 4 main hazardous waste codes related to wood:

EWC Code	Description
03-01-04*	Sawdust, shavings, cuttings, wood, particle board and veneer containing hazardous substances (wastes from wood processing and the production of panels and furniture)
17-02-04*	Glass, plastic and wood containing or contaminated with hazardous substances (construction and demolition)
19-12-06*	Wood containing hazardous substances (waste treatment, mechanical process)
20-01-37*	Wood containing hazardous substances (municipal wastes)

5. The reprocessor must also raise a consignment note to record the reject which must be raised and sent to supplier and haulier immediately action is agreed.
6. Notification of rejection and subsequent consignment notes need to be reported by both parties to the EA on 03708 506 506 within 24 hours and included on quarterly consignee returns.