

Elliott Nash Limited Waste Management Procedure (SHE 19)

Introduction

Elliott Nash Limited is fully committed to reducing its impact upon the environment by managing its waste streams in an effective and sustainable manner. Due to the nature of activities of the company a wide variety of wastes are produced and collected ranging from; general and domestic wastes, to recyclable materials, through to hazardous wastes. Elliott Nash Limited has a duty to ensure that all of these waste streams are managed and disposed of responsibly, using approved, registered waste contractors.

This Procedure sets down the framework for all waste management across the six regional offices. Detailed up-to-date information on the correct disposal arrangements and routes for all waste streams can be found via links below.

Environmental Waste Disposal Procedure

Elliott Nash Limited will adopt the principles of the 'Best Practicable Environmental Option' (BPEO) in the delivery of its waste management arrangements. The Company will apply a 'waste hierarchical approach,' to reduce, reuse, recycle and recover waste materials and products in preference to the disposal of waste to landfill.

There is a legal requirement for all who produce, keep or dispose of waste of any type to comply with the various regulations and Duty of Care under Environmental Protection Legislation. Elliott Nash Limited recognizes the importance of meeting these legal requirements and the need to manage our waste streams responsibly to reduce the volume of waste sent to landfill and to maximise reuse techniques and recycling opportunities wherever possible.

Elliott Nash Limited staff, stakeholders, contractors, visitors and members of the public including anyone else making use of their premises are to comply with this procedure and to achieve compliance with all waste legislation.

Best Practicable Environmental Option (BEPO)

The Best Practicable Environmental Option (BEPO) refers to the analysis of different methods of waste disposal. The preferred option is one which minimises harm to the environment as a whole, taking into account what is affordable and practicable.

The Environmental Protection Act 1990 (EPA 1990)

This is the single most important piece of environmental legislation and it controls many aspects of how the environment is protected and regulated. The EPA 1990 (amended 1995) provides the main statutory framework in relation to Waste Management.

The majority of waste being removed from the ENC offices is Controlled Waste. This is described within the EPA 1990 as waste arising from household, commercial, or industrial premises.

Section 34 of the EPA 1990 imposes a 'Duty of Care' on all producers and handlers of waste, 'to take reasonable measures to prevent the unauthorised deposit, treatment or disposal of waste. This means that the Elliott Nash Limited will:

- Maintain and keep records of how much waste we generate.

Section	Revision No	Issue Date	Review Date	Approved
SHE 19	1	July 2011	July 2012	Yes/BMP

- Ensure that only registered carriers collect and remove our waste.
- Ensure that all transfer notes and supporting documents are completed, detailing the type of waste for disposal.
- Maintain and keep records and supporting documents for a minimum period of three years.
- Ensure that all waste is dealt with in accordance with the EPA 1990 Section 34.
- Ensure that no 'private' or 'external waste' is brought on to any office/premises.

Breach of this Duty of Care is a criminal offence and can incur penalties of up to £20,000 or an unlimited fine if convicted on indictment.

Hazardous Waste

Hazardous Waste is the most dangerous waste as this can cause the greatest environmental impact and is harmful to human health. Hazardous Waste is listed within The List of Wastes (England) Regulations 2005. Some common Hazardous Wastes are listed below:

- Acids, Alkaline Solutions
- Solvents and Paints
- Pesticides
- Batteries
- Fluorescent Tubes, Televisions and Computer Equipment
- Photographic Chemicals and Hazardous Chemical Substances
- Waste Oils and Fuels.

Other hazardous wastes such as Asbestos and Radioactive Substances are subject to their own specific legislation.

Any transfer of Hazardous Waste from UES offices/premises should be via a specialist waste contractor using the relevant Hazardous Waste Consignment notes.

Elliott Nash Limited staff, stakeholders, contractors, visitors and members of the public are to take reasonable care to minimise the waste they produce. Where there are products and materials that are identified for disposal or are no longer required the following hierarchy of control options is to be followed:

Reduce – also known as Waste Minimisation, to reduce the amount of waste being produced.

Reduce your waste:

- Buy in bulk. It will reduce your packaging.

Section	Revision No	Issue Date	Review Date	Approved
SHE 19	1	July 2011	July 2012	Yes/BMP

- Buy only what you need. You should control stock and look to streamline processes across departments.
- Ask staff to 'think before they throw'. Someone else may want to use it.
- Where possible set printers to print double sided by default.
- When buying equipment consider the product's durability or lifespan. Replacing equipment less often will reduce the waste you create.
- Consider the necessity of producing a paper copy of documents if saved on electronically

Reuse – continually to reuse an item in order to eliminate the use of resources in making new items.
Reuse your waste:

- Refill toner and ink-jet cartridges.
- Use waste paper as notepaper.
- Use durable cups, mugs, glasses and cutlery rather than disposable alternatives.
- Reuse envelopes.

Recovery (Recycling) – the collection and reprocessing of wastes either into the same product or a different one. Recycling arrangements are specific and most cost effective to each regional office.

Recovery (Composting) – biological decomposition of organic material to create a soil conditioner.

Recovery (Energy) – Waste is incinerated and the heat is recovered to generate energy.

Disposal – Waste materials are sent in an untreated condition to landfill.

Note:

All recycling and waste material should be monitored and managed at each regional office by the designated waste champion.

Waste Documentation

All waste transfers should be covered by a waste transfer note (WTN). General waste, sanitary waste and recycle materials may be covered by a single annual waste transfer note.

Waste Transfer Notes

Any controlled waste that is collected in the UK must, under the [Duty of Care](#), be covered by a Waste Transfer Note (WTN) or – for Hazardous/Special Waste – a Consignment Note.

One of the requirements of these documents is to describe the waste. This will require some written description that will vary according to the waste carrier, but it will always require a European Waste Code (EWC). This is a list of wastes that has been produced by the European Union to standardise the description of waste across Europe and to enable waste to be recorded, monitored and controlled more effectively.

The EWC codes have been transposed into UK Regulation through the [List of Wastes Regulations](#).

Section	Revision No	Issue Date	Review Date	Approved
SHE 19	1	July 2011	July 2012	Yes/BMP

The EWC codes are made up of approximately 650 different codes divided into 20 categories each of which contain a number of sub-categories. Wastes that are considered to be hazardous are denoted by an asterisk in the list.

Each code is six digits and many codes are double entries where there will be a code for the non hazardous version of the waste and another – with asterisk – for the hazardous version. There are also codes that end in 99 which are used for ‘waste not otherwise specified’ Generally, the Environment Agency does not allow these to be used as a waste description on Transfer Notes and Consignment Notes.

A copy of the Waste Carrier / Waste Management licenses of waste contractors used by Elliott Nash Limited should also be held on file and all Waste Transfer Notes and Consignment Notes retained for a minimum of 3 years.

Check All Waste Carriers via the Environmental Agencies Public Register

<http://www2.environment-agency.gov.uk/epr/search.asp?type=register>

Useful Waste Management sites:

<http://www.environment-agency.gov.uk/>

<http://www.360environmental.co.uk/>

<http://www.netregs.gov.uk/>

<http://www.envirowise.gov.uk/>

Section	Revision No	Issue Date	Review Date	Approved
SHE 19	1	July 2011	July 2012	Yes/BMP

Section	Revision No	Issue Date	Review Date	Approved
SHE 19	1	July 2011	July 2012	Yes/BMP