

GUIDANCE NOTE

ASSESSING REUSABLE PACKAGING – COMPLYING WITH WASTE & HAZARDOUS WASTE REGULATIONS

- The Environment Agency approach is that packaging can only be considered Hazardous Waste if it is first determined the packaging is itself waste.

Following this approach it must be determined if the packaging is reusable or not.

- The Environment Agency state packaging is reusable if it can be reused in its existing condition (refilled without cleaning) or it requires a simple washing process prior to reuse (this may or may not be the previous user).
- If this is the case you will have complied with the upper most tier of the Waste Hierarchy and prevented the production of waste.

The following are examples of when packaging is NOT reusable and therefore waste (potentially Hazardous Waste depending on properties of previous filling good):-

- An IBC with a damaged pallet or cage cannot be reused without significant repair. It is waste.
- An IBC with an inner bottle which cannot be cleaned. Even if the cage can be reused and a replacement inner bottle fitted. It is waste.
- An IBC or drum fitted with a liner which needs to be disposed of. It is waste.
- A steel drum which requires shot blasting or furnace treatment. This is not a simple wash process. It is waste.
- An IBC or drum which requires an intensive chemical or solvent washing process. This is not a simple wash process. It is waste.
- The package is sent for recycling, scrap or landfill. It is waste

When sending your empty un-cleaned containers to DELTA you must pre-assess your packaging and segregate those which are reusable from those which are not.

Those which are not reusable must then be further segregated into those which are non-hazardous and those which are hazardous.

Doing so will reduce the number of waste containers you generate and reduce the amount which must be Consigned as Hazardous Waste.

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Pre-assess your packaging and segregate as follows.

Empty* Un-cleaned packaging with or without Hazardous Properties.

- That is not damaged.
- Is washable**
- Does not contain liners.



Can be moved as REUSABLE PACKAGING .



DELTA will accept this as REUSABLE packaging.

Empty* Un-cleaned packaging which is Non-Hazardous.

- That is damaged.
and / or
- Is NOT washable.
and / or
- Contains liners.



Must be transferred as Non-Hazardous Waste using Waste Transfer Note + corresponding EWC code.



DELTA will accept this as Non-Hazardous WASTE packaging in accordance with our Waste Permit.

Empty* Un-cleaned packaging with Hazardous Properties.

- That is damaged.
and / or
- Is NOT washable.
and / or
- Contains liners.



MUST be CONSIGNED as HAZARDOUS WASTE EWC 150110



DELTA will accept this as Hazardous Waste Packaging in accordance with our Waste Permit.

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*Empty - *“Means that all reasonable efforts have been made to remove any left-over contents from the container. This may involve for example physical or mechanical means such as draining or scraping, The method of emptying will depend upon the container and the substances involved”.*

**Washable - The washing process employed at Delta consisting of mild caustic wash, hot water wash & fresh water rinse is consistent with the Environment Agency’s definition of a simple wash process.

More intense chemical / solvent washing, shot blasting or furnace work Is not a considered simple washing by the Environment Agency.

IF you have assessed any of your packaging as Hazardous Waste then you are a Producer of Hazardous Waste.

As a “Producer” of Hazardous Waste Packaging you must:-

- Consider the Waste Hierarchy prior to completing a Hazardous Waste Consignment Note. Preparing for Reuse (i.e. send your packaging to a reconditioner) or Recycling must be favored over Disposal.
- Complete a Hazardous Waste Consignment Note when moving Hazardous Waste from your site. (If you do not issue your own Consignment Note our drivers or haulier can provide one for you to complete).
- Ensure the packaging is as empty as practicably possible. If the packaging is not empty then it can NOT be consigned as Hazardous Packaging Waste. It must be consigned with EWC code and description of the filling good itself.

As a consignee (receiver) of Hazardous Waste Packaging we will:-

- Provide you (the Producer) a quarterly Producer Return confirming receipt of your Hazardous Waste Packaging and description of the disposal or recovery method applied to the waste.
- Provide the Environment Agency a quarterly Consignee Return detailing all Hazardous Waste received at our site.

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- The Environment Agency will charge us the receiver of the waste a fee for every single Consignment we receive from you. Depending on the volume of Hazardous Waste Packaging we receive from you we may recharge this fee to you.

DELTA have worked in partnership with the Industrial Packaging Association and the Environment Agency to designed a specific Hazardous Waste Consignment Note specially designed for Empty Un-cleaned Packaging. These notes fully comply with the regulations but are simpler to complete if you are consigning solely waste packaging i.e. Drums & IBC's EWC 15-01-10.

The Environment Agency stress it is the responsibility of the Producer of the empty packaging to assess if it is waste and subsequently if it is Hazardous Waste.

Delta have produced this guidance as a means to help you make this assessment. If you require any further assistance with this matter please do not hesitate to contact either myself or your regular contact at Delta.

Yours sincerely,

Adam White
Delta Group Managing Director – DGSA, COTC.