HOW TO...
Manage Waste Transfer Notes and Consignment Notes...
How to: Manage Waste Transfer Notes and Consignment Notes...

Did you know that if you either produce waste or are responsible for its final disposal, you have a legal ‘Duty of Care’ to ensure it is managed responsibly? It is a common misconception that once waste has been passed onto a waste contractor it is no longer your responsibility. This is not the case. For most construction companies fulfilling you legal Duty of Care means you have an obligation to ensure:

• You look after the waste whilst it is in your control which includes preventing it from escaping.
• You only transfer waste to someone who is licensed to carry it. You need to obtain a copy of their Waste Carriers Licence and check it is valid.
• It is disposed of by someone that it licensed to do so. You need to obtain a copy of their Environmental Permit or Exemption Licence and check it is valid for the type of waste you are disposing of.

If you are found guilty of not complying with the legislation and the case is heard in the Crown Court, you may be liable for an unlimited fine and/or a prison sentence.

One part of the process to confirm you have fulfilled your legal obligation is to complete a waste transfer note or consignment note when you transfer waste to your waste contractor. This guide will focus on explaining:

• What a Waste Transfer Note is.
• The differences between a Waste Transfer Note and a Consignment Note.
• How to complete a Waste Transfer Note.
• The other obligations you have under legislation.

What is the difference?

A Waste Transfer Note is a document which must accompany every movement of inert and non-hazardous waste. This means all waste, except for that classified as hazardous. The document includes all information necessary for a waste contractor to identify it and determine how best to dispose of it. It is a legal requirement to keep copies of all waste transfer notes for a minimum of two years.

There are two types of Waste Transfer Note; a single waste transfer note and a season waste transfer note. The single waste transfer note covers an individual movement of waste whereas the season ticket can cover a multitude of movements of the same type of waste, collected from the same location for a twelve month period. Season tickets are common for regular collections of general waste for example, but would not be suitable for collections of different types of waste from different locations.

In contrast, a Consignment Note is the document required for the movement of hazardous waste. It is a legal requirement to keep copies of all consignment notes for a minimum of three years.

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How to Complete a Waste Transfer Note

The Environment Agency has produced a sample Waste Transfer Note which contains all the information necessary to comply with waste legislation, available via the following link:


However, most waste contractors produce their own documents in order to meet their own business needs as well as the legal requirements. Remember, it is your responsibility to ensure the document is completed correctly and, if you transport waste directly to a disposal site, you are responsible for supplying the note as well. It should contain the following information:

- **Description:** the waste must have a written description e.g. timber, spoil, plastic.
- **European Waste Catalogue Code:** The waste must be categorised by a six digit reference number, in accordance with the European Waste Catalogue. (For more information visit the ‘Links’ page on the ‘Useful stuff’ section of the CONSTRUCT website)
- **How the waste is contained:** e.g. skip, loose, in bags etc.
- **The quantity of waste.** How this is recorded is not prescribed so you could declare it as 1 tonne, 6 x 10kg bag etc, as long as it is clear. This information is mainly used by the waste contractor for charging purposes.
- **The name and contact details of the waste ‘transferor’:** This is the current holder of the waste and, in most cases, will be you as the producer. It will require your name and the Company’s address (normally a head office address).
- **A declaration that you have applied the waste management hierarchy to the waste you produce:** This means you must have considered the possibility of reducing, reusing or recycling the waste before deciding to dispose of it. This was introduced as a requirement on Waste Transfer Notes in September 2011.
- **The 2007 Standard Industry Classification Code (SIC Code) for your business.** This was introduced as a requirement on Waste Transfer Notes in September 2011. If you are unsure of your SIC code, they can be found via the following link - http://www.companieshouse.gov.uk/infoAndGuide/sic/sic2007.shtml.
- **The name and contact details of the person collecting the waste, the ‘transferee’:** This is the name and address of the waste contractor you have employed.
- **Details of the ‘transferee’s’ Waste Carriers Licence:** A Waste Carriers Licence is required for anybody carrying waste. (For more information visit the ‘Links’ page on the ‘Useful stuff’ section of the CONSTRUCT website)
- **Address of point of collection:** This is the address of where the waste is physically being collected from.
- **Signatures and Dates:** signatures will be required from both parties, along with the date.

![Duty of care: waste transfer note](image)
Consignment Notes: Additional Information

A consignment note must be completed to accompany hazardous waste when moved from any premises, including movements between premises belonging to the same company. A hazardous waste consignment note is required even if the holder of the waste does not change when being moved, which differs from waste transfer note requirements for non-hazardous waste.

Another difference is that the party responsible for the final disposal of the waste is required to send you a document called the Consignee’s Return. This confirms they have received the hazardous waste from you.

The Environment Agency has produced some excellent guidance on the completion of consignment notes, which can be found on the ‘Links’ page on the ‘Useful stuff’ section of the CONSTRUCT website.

If you produce or hold hazardous waste at any premises in England and Wales you must register it each year, unless the total quantity is less than 500kg each year. You will be required to include this registration number on the consignment note. In order to register a site, you will need your Standard Industry Classification (SIC) Code, your Companies House registration number and the full postal address of both the Head Office and the site you intend to register. Registration can be done either over the phone at a cost of £23 or online at a cost of £18 per site. For more information, please visit http://www.environment-agency.gov.uk/business/topics/waste/32198.aspx. Premises in Scotland or Northern Ireland are not required to register.
Common Mistakes

The biggest mistake made is that these documents are not taken seriously. Not only are they required by legislation, they are required to be completed accurately. In a lot of cases information is missing or incorrect. These documents can be requested by your Client or the Regulator so it is paramount that you check the information supplied.

Suggestions on how to get your house in order

- **Train everyone involved with the process:** This includes those people that physically hand over the waste such as yardmen and grab drivers, as well as administrators who process and file the waste transfer / consignment notes. Go through in detail what should be contained on the notes or consider providing them with an example of one that has been completed perfectly so they have a benchmark to compare against. If mistakes are found, you may need to contact the waste contractor to get the problem rectified.

- **Brief the European Waste Catalogue:** not in its entirety but the sections of it applicable to the type of waste you are generating. The top 10 typical waste streams can be laminated with their corresponding EWC code for people involved to help them check whether the correct code has been used.

- **Accessibility:** Make sure you have a process in place to ensure all tickets are maintained, and easily accessible, for two years (three for consignment notes).

- **Audit the process:** Depending on your organisation, this can be a formal documented audit or it can be used to mentor individuals. Consider creating a checklist as this may help to raise awareness of the requirements.
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Further Information

If you carry waste, regardless of quantity, you are required to register with the Environment Agency as a Waste Carrier. You might not think you do carry waste, but even the removal of small amounts of waste construction material would require you to be registered. It costs £154 to register as an upper tier carrier, which is valid for three years. To find out if you do need to register, access the Environment Agency’s self-assessment tool at: http://www.environment-agency.gov.uk/business/sectors/143914.aspx.

The European Waste Catalogue has been transposed into the UK through the List of Waste Regulations. The Regulations require that all waste is categorised with a six digit code. A copy of the consolidated version of the European Waste Catalogue is available from the Environment Agency website at: http://www.environment-agency.gov.uk/static/documents/Leisure/EWC_31-03-09_CH.pdf.

Take the next step

If you would like to find out how Waste Transfer Notes and Consignment Notes could help improve waste management in your business, then please contact Tracey Stafford on 07703 186974 or email tstafford@construct.org.uk.

To find out more about how Exemplas can provide your business with the support it needs to drive performance, call 0845 600 9130 or email businesssupport@exemplas.com.