



ENVIRONMENTAL BRIEFING

Waste Duty of Care Requirements

Background

As waste producers we have a legal Duty of Care for all wastes we produce at our sites – even once the waste has left our site. This means that we must segregate, store and label waste correctly. We must also transfer waste using a registered waste carrier and ensure that the waste is being taken to a site with a suitable waste permit or registered waste exemption. All waste leaving site must have a waste transfer note or consignment note, a copy of which must be retained on site. **BEFORE** waste is transferred from site, we must also have copies of waste carrier's licences and documented evidence that the waste disposal or treatment site can accept the waste we are sending. Waste carrier's licences, waste permits or registered exemptions should be checked carefully before waste is transferred.

Recent internal and external audits have identified gaps in Duty of Care records. Environmental regulators (EA, NRW or SEPA) can carry out waste audits at our sites at any time. Failure to retain all required documentation can result in regulatory action being taken against us. If a waste carrier or waste site accepting CEMEX waste is shown not to comply with the law, by accepting unacceptable waste for example, then regulators will also check the Duty of Care chain back to the place the waste originated. Where gaps are identified then significant costs and fines may result. If Duty of Care non-conformities are identified by our auditors during ISO 14001 audits, this could lead to a major non-conformity which if not addressed could put our ISO 14001 certification at risk.

The CEMEX EMS requires that **ALL** waste chains are checked and documented in the Waste Management Register. The columns in the register provide a guide to what information is required including the European Waste Classification codes for wastes most commonly sent from our sites. Please ensure extra care is taken when engaging local waste companies. Manual 4 work instruction ENV 04 explains in detail the process and documentation which must be retained.

WASTE MANAGEMENT REGISTER	
Material	Waste Code
Waste Clay / Clayed Paving (containing dangerous substances)	17 01 12
Waste Slurry and Adhesives (containing dangerous substances)	17 01 12
Waste concrete and concrete rubble	17 01 14
Waste concrete	17 01 14
Cardboard	17 01 14
Waste and Substances (containing dangerous substances)	17 01 14
Conditioned floor slabs (asphalt, stone)	17 01 14
Mixed Waste	17 01 14



Key Points

- Identify an appropriate disposal route for all wastes arising on site using form SR18 Waste Management Register
- Segregate wastes in properly labelled facilities - do not mix general wastes, recyclable wastes and hazardous (special) wastes.
- Any waste leaving CEMEX sites must be covered by correctly completed waste documentation.
 - For Non – Hazardous and Inert Wastes – a **Waste Transfer Note** with all required details below either supplied by the contractor or a CEMEX waste transfer note. This may be an annual note unless any details change when a new note would be required.
 - For Hazardous (Special) Wastes – a **Hazardous (Special) Waste Consignment Note** – provided by the waste company for each collection with sections A – D completed. A consignee return or consignment note with sections A – E completed to be provided by the waste company at least quarterly when waste has been collected.
- All duty of care documentation must be correctly completed, so please take time to check the following before signing them.
 - CEMEX Address** – The Rugby head office address may be included but it is essential that the site address including correct postcode is also recorded.
 - Waste description** – Waste is described in words and has the 6-digit EWC code. The description needs to provide enough information to enable subsequent holders to avoid mismanaging the waste or causing injury.
 - Quantity and Containment** - (e.g., 1 x 14yd metal skip, 240 litre wheelie bin)
 - Standard Industry Classification Code** – (2007 list) – Readymix (2363), Sand & Gravel Quarry (0812), Hardrock Quarry (0811), Building Products (2361), Asphalt (2399)
 - Declaration to confirm that duty to apply the waste hierarchy has been complied with**
 - Waste Contractor Address** – The address needs to state where it is going next e.g., Biggin Hill Transfer Station - Licence number: BH 05569887.
 - Date and time of transfer and waste destination**
 - Waste carrier details** (The waste carrier's licence number must be on the transfer note)
 - Signatures** – signatures must be accompanied by a legible print of the name.
 - Premises code** – only applicable for hazardous waste transfers in Wales (where site produces more than 500kg hazardous waste per annum.) For England, a unique consignment note code should be created using CEMEXQ followed by a number. Sites are differentiated using postcode.
- Keep the copy marked 'Transferor, Consignor, Customer or Waste Producer'.
- Waste transfer notes must be kept on site or at a central location for two years and hazardous waste consignment notes must be kept for three years, after waste disposal. Consignee returns must also be retained.
- Ensure that you keep a valid copy of the waste carrier's licence and final disposal site licences for all wastes transferred.
- Costs and fines can be significant where Duty of Care offences are committed.

For further details or information, please contact a member of the Sustainability Department.