

# Environmental Protection and Waste Disposal Policy

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## SUMMARY OF DUTIES

As an employer we have a general duty under ss.2 and 3 of the **Health and Safety at Work Act 1974** to ensure, so far as is reasonably practicable, the health and safety of employees and other persons who may be affected by the storage, handling or disposal of waste products.

Section 1 of the **Factories Act 1961** and s.4 of the **Offices, Shops and Railway Premises Act 1963** require the employer to ensure that waste material does not accumulate and is removed daily.

Section 33 of the **Environmental Protection Act 1990** states that employers must not dispose of controlled waste in a manner which is likely to cause harm to the environment or to human health.

Section 34 of this Act extends the employer's general duty of care to the prevention of unintentional escape of waste and the arrangement of waste transportation and disposal by an authorised person. An authorised person is:

- (a) someone who is the holder of a waste management licence
- (b) a local authority which is a waste collection authority (or Scottish waste disposal authority)
- (c) Any person registered as a carrier of controlled waste in accordance with the **Control of Pollution (Amendment) Act 1989**.

Use of plant or equipment which deals with controlled waste must be licensed in compliance with the **Environmental Protection Act 1990** and associated Regulations.

The **Special Waste Regulations 1996** apply to controlled wastes that have a flash point of less than 21°C or are dangerous to life due to containing one or more of the substances listed in schedule I, part 1 of the Regulations. A consignment note must be used at each stage of disposal and signed at each transfer of the waste to the disposal site.

The **Water Industry Act 1991** makes it an offence to discharge trade effluent into the sewer without the approval of the relevant water authority.

Regulation 1.8 of the **Control of Asbestos at Work Regulations 1987** as amended requires that waste which contains asbestos is transported in a suitable and sealed container that is clearly marked to show that it contains asbestos. These containers should be designed, constructed and maintained to prevent any of the contents escaping during normal handling.

Specific regulations apply to the disposal of radioactive waste and explosives. Landfill operators are now liable for tax on all consignments of waste accepted for landfill disposal, with the exception of certain exempt categories of waste. The aim of this tax is to discourage landfill disposal and therefore promote more environmentally acceptable options such as waste reduction and recycling.

## RECORD KEEPING

The Environmental Protection (Duty of Care) Regulations 1991 require that records of waste transfer and disposal arrangements are kept. A transfer note must be completed and handed to the carrier or authorised waste disposal body. This note contains information about the waste and about the parties to the transference of waste. Copies of a transfer note must be kept by both parties for a minimum of two years. The regulations do not require every individual transfer to be independently documented. For example, regular collections of non-hazardous commercial waste or removal of a large quantity of waste by multiple vehicles can be included within a single transfer note, provided that the description and other details about the contents of the waste are covered in the original note. In these instances, one transfer note would be valid for up to one year.

Copies of Special Waste consignment notes will be kept for at least two years. Records will be kept of correspondence between waste disposal authorities and approved recycling

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organisations as a demonstration that the company has complied with statutory requirements for making arrangements for disposal of waste.

Where we operate recycling schemes (paper, aluminium cans, etc) a record will be kept of the recycling company's authority to carry out the work along with details of the waste that is transferred to that organisation.

## POLICY STATEMENT

Fork Truck Direct Ltd is committed to ensuring the health, safety and welfare of its employees and of others who may be affected by the waste materials which result from our work. Our policy is to arrange for the disposal of all waste products regularly, safely and in accordance with statutory requirements.

The waste disposal arrangements will be regularly reviewed. Recycling initiatives will be taken where reasonably practicable in order to help protect the environment and make better use of resources.

The persons responsible for the implementation of this policy are “workshops”, The Workshop Manager, “service engineers”, The Service Manager.

## ARRANGEMENTS FOR SECURING THE HEALTH AND SAFETY OF WORKERS

### Waste disposal containers

Suitable receptacles for the collection of waste are provided in strategic positions throughout the workplace. Each container clearly displays the type of waste that it is designed to hold. Waste products must only be placed into those receptacles that have been allocated for that purpose. Containers must be adequate to prevent the escape of waste. Waste containers are emptied regularly and are removed by an authorised person. If additional disposal facilities are required these may be obtained by request from a responsible person.

Where it can be determined that certain waste is suitable for recycling, the appropriate containers will be supplied and clearly marked.

### Disposal of hazardous waste

Suitable arrangements will be made for the disposal of hazardous waste that is generated as a by-product of a work activity. The correct pre-notification and documentation procedure will be followed for Special Waste.

Arrangements for the removal of special waste, eg liquids, asbestos and other hazardous substances, must be made with an authorised and competent person. Liquid waste, other than normal effluent, must not be poured into the sewers. Arrangements for disposal of liquid waste can be made with an authorised person. Employees will be supplied with any personal protective equipment necessary for the safe handling of waste materials.

### Management responsibility

Managers must ensure that this policy is adhered to within their area of authority. Special arrangements regarding disposal of waste products must be organised in association with the Waste Regulation Authority or a competent and licensed contractor.

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Employee responsibility; All employees must ensure that they dispose of waste products in receptacles specifically provided for that purpose taking note of any segregation requirements. If an appropriate container is not available, this must be reported to a manager who will make suitable arrangements. The use of personal protective equipment may be necessary during the handling of some wastes. Any requirement must be established before the waste handling activity commences. Employees should be aware of their responsibilities under the Duty of Care. Employees must report any problems which arise regarding waste disposal to a responsible person (usually a manager or supervisor) so that corrective action can be taken.

## **Information and training**

Suitable and sufficient information and training will be provided, as necessary, to ensure that this policy is fully understood and adhered to and that no person is put at risk by the inappropriate disposal of waste.

## **SAFE SYSTEM OF WORK**

This system of work has been designed to ensure that disposal of waste at the workplace is carried out safely and in accordance with the law.

1. Use only designated receptacles for holding waste products. Do not put waste materials in receptacles that have not been allocated for that specific purpose. Take note of any segregation requirements, e.g. for hazardous waste or recyclable materials.
2. Do not discard waste carelessly into receptacles; place it properly inside the unit.
3. Do not overfill waste containers. Inform a responsible person when additional resources are likely to be required.
4. Report any leakage or overflow of waste from a waste container to a responsible person.
5. Ensure that any spillage of substances at the work place is cleared in an approved manner and that any materials used for clearing are properly disposed of.
6. Make a note of any special arrangements or precautions that will have to be taken by the authorised waste remover.
7. Do not leave waste on customer's premises. Always return waste to the workshop for proper disposal.
8. Wear any personal protective equipment that is required for the safe handling of waste products.

## **SUMMARY POLICY STATEMENT**

To ensure that waste is disposed of safely and in accordance with statutory requirements, the three steps below should be followed:

- (a) Do not allow waste to accumulate but regularly move it to properly marked and suitable containers
  - (b) Ensure compliance with the Duty of Care imposed by the Environmental Protection Act 1990, and all relevant waste regulations
  - (c) Report any problems regarding waste or waste disposal immediately to a responsible person.
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