Quick Guide - Hazardous waste at End of Life Vehicles (ELV) sites.

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What's this document about?

This document provides information and examples of the different types of hazardous waste accepted and produced on End of Life Vehicle (ELV) sites. It gives examples when consignment notes are required and are not required for the movement of ELVs.

It explains when reduced consignee return reporting can take place and explains the hazardous waste records that must be kept and for how long they must be kept.

Who does this apply to?

Environment officers, enforcement officers and others who are regulating ELV sites.

Contact for queries and feedback

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Hazardous wastes accepted or produced at ELV sites

The purpose of this document is to:

- Provide information of the types of hazardous waste you are likely to see on an ELV site.
- Provide examples of when hazardous waste consignment notes are required.
- Explain the consignee returns requirements that apply to ELV sites.
- Explain what hazardous waste records must be kept and for how long they must be kept.

Why is this important?

Operators of ELV sites accept hazardous wastes such as; undepolluted ELVs, lead acid batteries and catalytic converters to their site.

The ELV depollution process also produces a number of hazardous wastes including; depollution fluids, catalytic converters, lead acid batteries and air conditioning gasses.

Salvage sites that store vehicles pending assessment by insurers may send undepolluted ELVs to other ELV sites for depollution.

There are a number of different scenarios involving hazardous wastes at sites handling ELVs.

Types of hazardous waste typically found at ELV sites

Imported hazardous wastes

ELVs are waste. ELVs that have not been through the depollution process are hazardous waste because they contain hazardous fluids, substances and components.

ELV sites may also accept other hazardous wastes such as lead acid batteries and catalytic converters produced by third parties. These third parties can include members of the public and vehicle repair workshops/garages.

Hazardous wastes produced by a typical ELV site

The ELV depollution and dismantling process produces a number of hazardous wastes which include:

- Engine, hydraulic oils and uncrushed oil filters;
- Batteries lead acid and Nickel-cadmium (Ni-Cd) batteries. (Ni-Cd are found in older generation hybrids like the Toyota Prius);
- Petrol, diesel, fuel oil and mixed fuels from mis-fuelling;
- Brake fluids (and brake pads containing asbestos);
- Antifreeze;
- Air conditioning gases;
- Catalytic converters containing refractory ceramic fibres (RCF);
- Mercury containing switches;
- Undepolluted ELVs; and
- Interceptor solids, sludges and oily water.

Lists of Waste (EWC) codes for ELV hazardous wastes

List of wastes codes

List of waste codes for hazardous wastes produced or imported to ELV sites.

List of waste code	Description
13-01-11*/13-01-12*/13-01-13*	Hydraulic oils
13-02-06*/13-02-07*/13-02-08*	Engine, gear and lubricating oils
13-05-03*	Interceptor sludges
13-05-07*	Oily water from interceptor
13-05-01*	Solid waste from interceptor
13-07-01*	Fuel oil and diesel
13-07-02*	Petrol
13-07-03*	Other fuels, including mixed fuels from mis-fuelling
14-06-01*	Air conditioning gas (R12 or R134a)
14-06-02*	Air conditioning gas (HFO-1234yf)
16-01-04*	End-of-life vehicles - undepolluted
16-01-07*	Oil filters
16-01-08*	Mercury containing components (tilt switches)
16-01-11*	Brake pads containing asbestos (older ELVs)
16-01-13*	Brake fluids
16-01-14*	Antifreeze containing hazardous substances
16-01-21*	Catalytic converter/ DPF units containing (RCF)
16-06-01*	Lead acid batteries
16-06-02*	Ni-Cd batteries

When are consignment notes required for ELVs?

ELVs from householders and private individuals

The movement/collection of ELVs from domestic premises to the ELV site **are not subject to hazardous waste controls**. This means that there is no requirement for consignment notes to cover that movement and therefore there is no requirement for consignee returns for that movement.

Manufacturer's takeback schemes

Article 5 of the ELV Directive has placed a requirement on the vehicle manufacturers to maintain a network of convenient authorised treatment facilities for people to deliver ELVs into at no cost. This means that the last owners should always have an option to dispose of their vehicle at no

charge regardless of the prevailing value of scrap metal. The vehicle manufacturers meet these obligations through two service providers, CarTakeBack and Autogreen.

These producer responsibility obligations and other producer responsibility requirements are implemented via the End-of-Life Vehicles (Producer Responsibility) Regulations 2005 (as amended). The Environment Agency does not regulate this.

For more details about vehicle manufacturers producer responsibility and take back schemes see https://www.gov.uk/guidance/elv and https://www.smmt.co.uk/industry-topics/environment/care-group-uk/

Example 1 - Householder takes car to ELV site for scrapping

Hazardous Waste Regulation controls do not apply to separately collected household waste. This means that a householder can take their car to an ELV site and no consignment note is required.

The ELV site will need to record the acceptance of the ELV into their site for the purposes of the waste returns required by their permit. They will also be required to issue a Certificate of Destruction (CoD) and record it on the Driver Vehicle Licensing Agency (DVLA) CoD system. (We do not regulate the CoD system).

In this scenario operators are not required to have consignment notes and therefore keep hazardous waste records because they are accepting ELVs form householders.

Example 2 - ELvs collected from a householder

A registered waste carrier can collect an ELV from the householder (either as a private arrangement or as part of a vehicle manufacturer's take back scheme) and no consignment note is required for the movement of the ELV to the permitted site.

As in example 1 above there will be no consignment note for the movement of the ELV into the site and therefore no hazardous waste records need to be kept. The permit holder will need to record the acceptance of the ELV into their site for the purposes of the waste returns and issue a CoD.

Example 3 - Householder takes car to dealership

The producer responsibility obligations on vehicle manufacturers means that a householder/private individual can take their vehicle to a manufacturer's dealership either as:

- part of a manufacturers scrappage scheme;
- part exchange for a new vehicle; or
- leave their car with the dealer to arrange it to be scrapped.

The Hazardous Waste Regulation controls do not apply to householders taking their ELVs for "scrapping" so there is no requirement for a hazardous waste consignment note.

Dealerships can temporarily store the ELV under RPS 205 before arranging for it to be collected by a registered waste carrier and be taken to a permitted ELV site (ATF).

There must be a consignment note completed for the movement of the ELV from the dealership to the permitted site. The dealership will need to keep hazardous waste records. See section 6 for the record keeping requirements and consignee return reporting requirements.

Salvage yards

Salvage sites and yards are storage areas where vehicles that have been accident damaged are stored pending assessment and the claim settled by the insurance company.

These vehicles will not normally be regarded as waste until the claim is settled and the vehicle has been classed as unsuitable for repair and reuse as a vehicle on the UK roads. Many vehicles stored at salvage sites may never become waste because they are repaired and put back on the road.

Example 4 - Movements of ELVs from a salvage yard.

Where a vehicle becomes an ELV at the salvage site it may either be:

- depolluted and dismantled at the site, or
- sold (usually via auction) and moved from the salvage site to the ELV site that has purchased it.

Where the ELV is sold to another permitted ELV site for depollution and dismantling. The movement of the ELV from the salvage yard to the destination ELV site must be via a registered waste carrier and accompanied by a hazardous waste consignment note.

The salvage yard is the site of production and will need to keep hazardous waste records. The movement to the ELV site is the first movement and will be subject to reduced reporting requirements.

See section 6 for the record keeping requirements and consignee return reporting requirements.

Example 5 - Depollution of ELVs at a salvage yard

There may be cases where the vehicle has been assessed at the salvage site and becomes an ELV at that point. If the salvage site has an ELV permit the operator can depollute and dismantle the ELVs. In this instance there will be:

- no waste input for the waste return
- no movement for consignment notes.

In addition because the ELV is being depolluted and dismantled for recovery there will be no requirement for self-reporting for the purposes of hazardous waste consignee returns. There will however be a CoD issued for the ELV.

Hazardous waste consignment notes and records will need to be kept for the hazardous wastes generated by the depollution process.

Consignee returns and reduced consignee returns reporting

Who is the consignee and consignor?

The **consignee** is the party receiving the hazardous waste (in this case the permitted ELV site receiving the ELVs).

The **consignor** is the holder or producer of the waste who has sent the waste to the consignee.

Consignee returns

The consignee is required to submit quarterly returns for each load of hazardous waste they receive at their site. There are fees payable for each return made.

More detail about consignee returns and how to submit them can be found at https://www.gov.uk/guidance/hazardous-waste-returns-supplementary-guidance.

Consignee returns reporting deadlines

The quarterly reporting deadlines are:

Period	Deadline
January - March	30 April
April - June	31 July
July- September	31 October
October - December	31 January

Consignee returns fees payable

Fees are per consignment of waste and are:

- single consignment - £10 (electronic returns) or £19 (paper returns)
- multiple collection - £5 (electronic returns) or £10 (paper returns)

(Correct as of May 2018). Check https://www.gov.uk/dispose-hazardous-waste/consignee-returns for the latest fees.

The **first movement** of an undepolluted ELV to a permitted ELV site is eligible for **reduced consignee reporting**. So excluding any movements of an ELV from a domestic premises (because the hazardous waste regulation controls do not apply). Reduced consignee reporting can be applied to:

- The movement of an ELV from the dealership or other commercial premises/holder to a permitted site.
- The movement of an ELV from an auction site/salvage yard to a permitted site (provided this is the first movement of the ELV).

Reduced consigneee returns what is the benefit?

The reduced report only contains one return for all the movements from a site to the consignee site. This means only one fee is payable (£10 per electronic return per quarter per producer site) rather than a fee for each load received from the producer site.

How does reduced reporting work?

Each load of hazardous waste moved from one place to another must be accompanied by a consignment note. The consignment note covers a movement of hazardous waste and must have amongst other details a unique identifier code.

For hazardous wastes with reduced consignee reporting requirements, there is a particular code format to use. This is XXXXXX/YYYYY**D** (where the XXXXXX is the first 6 letters of the ATF name & the YYYYY is the unique note number).

The **D** after the number denotes that the load is subject to consignee returns with reduced reporting and charging requirements.

If the D is not included on the consignment note the load will not be eligible for reduced consignee reporting.

Hazardous waste moved without a consignment note cannot benefit from reduced reporting requirements and reduced charges.

What does the consignee have to do?

If a consignee receives any hazardous waste they must send a return to the Environment Agency on a quarterly basis.

They must also provide a return to the producer for their records.

For wastes with reduced reporting requirements the consignee should complete the return in the following way:

- Enter the consignment note code XXXXXX/YYYYYD into the return and mark the type of consignment as 'single'
- Enter date received as the last day of the quarter, in the format DD/MM/YYYY
- use the postcode for the consignee site
- Enter the List of Waste code (16 01 04* for undepolluted ELVs)
- Enter the total quantity (kg) received during that quarter
- Enter the recovery or disposal code (R4 for ELV depollution and dismantling)
- Enter the physical form of the waste (solid)
- Enter the hazardous properties for the waste - HP1 to HP15. (For undepolluted ELVs these are HP1, HP3, HP4, HP5, HP7, HP6, HP8, HP10, HP12, HP14)

ELV sites - what hazardous waste records must they keep?

ELV sites receive hazardous wastes and they produce hazardous wastes so depending on their operation they may need to keep producer records and consignee records.

Hazardous waste producers must keep copies of the consignment notes with the consignee return. This is the hazardous waste register and must be kept for 3 years at the site where the waste was produced.

The consignee return is the producer's copy of the consignment note plus either:

- The completed consignment note including Part E and confirmation from the consignee of the recovery method for the load. For ELV that have been depolluted and dismantled (R4 Recycling/reclamation of metals and metal compounds). If the ELV is stored and then sent to another ATF it would be (R13 Storage of wastes pending any of the operations numbered R1 to R12). **or**
- A record in the format prescribed by the regulations. This is set out in https://www.gov.uk/guidance/hazardous-waste-returns-supplementary-guidance#table-1

ELV sites - the consignee's hazardous waste records

The consignee must keep the following register records for 5 years:

- consignment notes
- any related documents, for example ‘carrier schedules’ (list of carriers when there is more than one), records of rejected loads
- a site inventory that records where waste was stored, treated or disposed of at their site.

For each delivery of hazardous waste the consignee must keep the following records (which for ELVs will be the same as on the consignment note):

- its weight in kilograms
- its waste description including the waste classification code, its chemical components and hazardous properties
- the name, address and postcode of the waste holder or producer it came from
- the disposal or recovery method applied to the waste for ELV depollution and dismantling it will be R4.

Related information

- https://www.gov.uk/guidance/hazardous-waste-returns-supplementary-guidance
- https://www.gov.uk/dispose-hazardous-waste/consignees
- https://www.gov.uk/dispose-hazardous-waste/producers-and-holders
- https://www.gov.uk/dispose-hazardous-waste