Commercial & Industrial Waste and Recycling Drop-Off Centres Guide

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Executive summary

Collections of commercial and industrial (C&I) waste and recyclable materials are widely available in much of the UK. However, the small quantities and/or types of waste produced by small and medium enterprises/businesses (SMEs) may not suit the types of service being offered locally. The charging systems of collection contractors may also make it uneconomical for SMEs to segregate their recyclables for collection.

SMEs wishing to access waste and recycling services require a solution that is convenient, enables them to comply with their legal Duty of Care, and is affordable. C&I waste and recycling ‘drop-off centres’ can provide additional opportunities for SMEs to recycle specific material streams, by allowing them to deposit materials at a time and a frequency that suits them. These facilities can potentially accept a much wider range of materials compared to a collection system.

‘Drop-off centre’ is the term used for a site to which a business can take its waste and recycling, as opposed to having it collected from its premises. Such sites can be located at Household Waste and Recycling Centres (HWRCs) or Waste Transfer Stations (WTSs). They can also be dedicated business waste/recycling centres or areas within industrial/business parks; and they may be provided by public, private or civil society (third sector) operators.

For local authorities there are several key considerations when looking to set up a C&I waste and recycling drop-off centre including:

- Benefits and drivers
- Legislation: Planning, permitting, compliance and charging
- Materials to accept
- Additional costs
- Accepting payment from customers
- Measuring and monitoring
- Addressing operational barriers

We have used case study evidence from local authority HWRC and WTS C&I drop-off centres operating in the UK, and drawn on the lessons learnt from these authorities in overcoming the common barriers encountered when setting up such services.

For local authorities, this guide provides:

- the key information to consider when developing a C&I drop-off centre for SMEs;
- signposts to where additional advice and information can be found to aid business case development and decision making.

The guide will be useful to local authorities that are considering setting up a C&I drop-off service as part of existing HWRC and/or WTS provision. It does not cover the
development of HWRCs for use by households, or charges to householders for use of community recycling centres.

We have set out information in a logical sequence; however, many of the decisions to be made will be co-dependent on other ‘steps’. It will be helpful to read the whole document in order to understand these co-dependencies. Also presented are relevant practical ideas, tips and hints from operational facilities.

This guide has been written primarily for England, and while it may be useful to operators in all nations, care should be taken to ensure that local regulations, policies and other circumstances are considered.
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Glossary and terms of reference

**Drop-off Centre** is the term used to specify a site to which a business can take its waste and recycling, as opposed to having it collected from its premises. Such sites are known to be located at Household Waste and Recycling Centres (HWRCs) or waste transfer stations; or can be dedicated business waste/recycling centres or areas within industrial/business parks.

**Commercial and Industrial (C&I) waste** is the term used throughout the document to describe all waste/materials produced by SMEs within the commercial and/or industrial sectors.

**Commercial waste** comes from a property used for the purposes of trade or business.

**Controlled waste** encompasses household, industrial and commercial waste.

**Industrial waste** is generated by an industrial activity, such as workshops, factories, laboratories, mills, and waste from construction or demolition works.

**Organisation** is the term used within the guide to refer to potential operators of C&I drop-off centres including local authorities, private sector contractors and civil society (third sector) waste management organisations.

**Residual waste** is the term used to describe waste/materials which are not re-used or recycled. It is commonly also referred to as refuse or black sack rubbish.

**Small and medium sized enterprises (SMEs)** are defined by the EU. Businesses with fewer than 10 staff and a turnover of less than €2 million, are a sub-set of SMEs and are termed **micro businesses**. For the purposes of this guide, we have considered that the waste and recycling to be managed at drop off centres will usually be generated by **micro businesses**, such as builders, plumbers, gardeners, small retailers and caterers.

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Acknowledgements

WRAP and Eunomia would like to thank the following organisations for their contributions during the preparation of this updated guide:

- Angus Council
- Amey
- Bedford County Council
- Buckinghamshire County Council
- Dorset Waste Partnership
- East London Waste Authority
- Hampshire County Council
- Kent County Council
- Norfolk County Council
- Northumberland County Council
- Somerset Waste Partnership
- Staffordshire County Council
- SUEZ
- Suffolk County Council
- The Highland Council
- Warwickshire County Council
1.0 Introduction
In June 2017 a survey of members of the National Association of Waste Disposal Officers (NAWDO) was carried out by WRAP to gather evidence from local authorities about their policies on charging for non-household waste at Household Waste & Recycling Centres (HWRCs), and for allowing SMEs to access HWRC services. The survey is part of the government’s work on the Litter Strategy for England, which includes the review and updating of this guidance document.

WRAP HWRC Survey
- A total of **55 local authorities** responded.
- **15 authorities allow SMEs access to HWRCs** either to generate additional income, to provide a service for SMEs or to legitimise SME behaviour where they were already using the HWRCs to dispose of their waste.
- **39 do not allow SMEs access to HWRCs**. However, this is not necessarily because they do not want to provide the service but rather because there are a number of **barriers** to them being able to do so.

The barriers are:
- How to measure material quantities where there is no access to a weighbridge
- Congestion on site and site layout
- How to accept payment
- The site is too small
- Council policy - not wanting SMEs to use the HWRC
- Council policy - not wanting to introduce charging.

Using the survey results to inform the update to this guide
- The 15 local authorities that allow SMEs access to their HWRCs were surveyed to find out how they overcame the barriers identified by the 39 local authorities that don’t offer this service.
- The responses and information gathered from them has been used throughout this document to provide examples of solutions to these barriers.

1.1 Scope of this Guide
Who is this guide aimed at?
This guide is aimed at senior officers within local authorities, their contractors and other partners who already operate Household Waste and Recycling Centres (HWRCs) or Waste Transfer Stations (WTS), and who are considering or planning to open up these facilities to accept C&I waste from SMEs. Readers are assumed to have good knowledge of the subject matter.
The guide covers:
- Benefits and drivers
- Materials to accept
- Additional costs
- Accepting payment from customers
- Measuring and monitoring
- Addressing operational barriers
- Legislation: Planning, permitting, compliance and charging

The guide does not cover:
- Setting up a HWRC / C&I Drop-off Centre from scratch
- In-depth guidance on planning and permitting for waste facilities

The guide is arranged in a logical sequence to take the reader through steps to achieving the acceptance of C&I Waste at an HWRC:
The diagram below demonstrates the balance between the costs and benefits of offering the service. This section outlines the key benefits and drivers for local authorities in allowing SMEs to use HWRC/WTS services. In Section 3.0 we will be taking a look at the likely additional costs involved.

1.2 Generating income to protect HWRC services for households

Allowing SMEs to use HWRCs can provide a means of generating income to support the service, and prevent sites from closing or having their opening hours reduced. Of the 15 respondents to the WRAP HWRC Survey 2017 who allow SMEs to use their HWRCs, seven stated that this was to generate income to support the service.

1.3 Managing existing SME behaviour

A 2010 Defra survey\(^2\) revealed that approximately 40% of English micro businesses use household waste and recycling services (kerbside collections and HWRCs) to dispose of or recycle their waste. For local authorities looking to expand their services at HWRCs, this may be legitimising current practice to some degree, but with the knock-on benefit of enabling SMEs to meet their Duty of Care while providing some benefit back to the

\(^2\) Recycling activities in SMEs – a survey, Defra 2010
authority in the form of income from service charges, rather than continuing as a cost burden.

1.4 Increasing access to waste and recycling services for SMEs

Some SMEs may find it difficult to access waste and recycling services if:

- they produce waste of certain types, such as garden or plumbers waste;
- where the waste may be at multiple sites other than their trading premises; or
- there may only be very small quantities (for instance, a new pump for a boiler) making regular collection services unsuitable.

In addition, the limited waste streams and nature of the pricing structure of collection services may make a separate collection for residual waste and recycling uneconomical, thus limiting the opportunities that SMEs have for recycling.

An additional benefit for local authorities could be that it strengthens the council's recycling ethos through enabling businesses to recycle the same materials that they do as householders, and additional materials from their businesses.

In future, EU municipal recycling targets will extend to many kinds of commercial waste, in addition to household waste. It is not yet certain that the new, higher recycling targets that have been agreed, will apply in the UK due to Brexit, or whether local authorities will be set recycling targets where they have not been in the past. However, the prospect of this legislation may make the issue of how to increase the recycling of C&I waste more pressing for local authorities in future.

1.5 Reducing fly-tipping

The estimated cost of clearance of the 1,002,000 incidents of fly-tipping reported by English local authorities in 2016/17 was £57.7 million. Household waste, white goods, demolition, garden and commercial wastes were found to be most frequently fly-tipped. Improved access to cost effective waste and recycling facilities may help reduce the number of incidents of fly-tipping, and provide a cost benefit to local authorities.

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2.0 **What materials should be accepted?**

2.1 **What am I allowed to accept?**

You should refer to your Environmental Permit to check which materials you can accept at your site. A standard rules permit will generally allow a limited tonnage of waste to be received on the site, including a wide range of packaging, garden wastes, construction and demolition waste, and other materials as shown in Figure 1. Hazardous materials such as asbestos or clinical waste can only be accepted if a specific permit is in place to allow this. A site’s planning conditions may also limit either the quantity or types of waste that may be received.

**Figure 1** A wide range of C&I waste materials can be recycled or disposed of at HWRCs on The Isle of Wight. Source, Amey, Afton Marsh HWRC

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2.2 **What do I have room for?**

2.2.1 *Identifying demand locally*

In order to predict the likely types and quantities of material received from SMEs, it is important to gain an understanding of the needs of local businesses, as well as their
current arrangements and what other service providers operate within the area. To inform the design of your service, you could gather information on the following points:

- the number and type of potential customers in your local area;
- what SMEs are doing with their waste/recycling currently and what they pay;
- what types of and how much waste they are producing; and
- what services and information they need or want.

Market research, either through formal survey work or through informal conversations with potential customers, is an effective tool for information gathering on expected quantities.

When assessing what space is available to accept C&I waste, consideration will need to be given to the quantity of additional material that would be expected to be received on site and its containment.

The quantity received will be influenced by a number of factors, including the rurality of the site, what types of businesses operate in the area, and whether there are more affordable or more convenient alternative services nearby. However, a number of local authorities that participated in the survey said that the amount of C&I waste received on an annual basis made up only a small proportion of their overall tonnage, the highest being only around 1.5%. Table 1 gives an indication of tonnage throughputs experienced by a number of local authorities for the year 2017.

**Table 1 Example tonnage throughputs**

<table>
<thead>
<tr>
<th>Local authority</th>
<th>Annual tonnage of C&amp;I waste across all sites (2017)</th>
<th>Number of sites</th>
<th>Average tonnage per site per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norfolk County Council</td>
<td>114</td>
<td>7</td>
<td>16</td>
</tr>
<tr>
<td>Somerset Waste Partnership</td>
<td>150</td>
<td>10</td>
<td>15</td>
</tr>
<tr>
<td>Hampshire County Council</td>
<td>160</td>
<td>26</td>
<td>6</td>
</tr>
<tr>
<td>Suffolk County Council</td>
<td>450</td>
<td>11</td>
<td>41</td>
</tr>
<tr>
<td>Buckinghamshire County Council</td>
<td>1000</td>
<td>10</td>
<td>100</td>
</tr>
</tbody>
</table>

A common approach for sites that found throughput to be low was to utilise containers and bays already in place for household waste. To ensure that trade and household tonnages were kept separate, records of trade waste received to site were taken and
then deducted from overall tonnages at the end of each reporting period. Figure 2 shows garden waste being unloaded into a bay from commercial and domestic vehicles.

**Figure 2** Shared Garden Waste Bay at HWRC. Source: Eunomia, LB Richmond HWRC, 2012

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### 2.2.2 Customer type

The businesses most likely to use a trade waste drop-off service are small businesses and sole traders, as they are less likely to have a contract in place to collect their waste. Sites currently in operation have found that users are often from the following sectors:

- Building, glazing and gardening;
- Retail;
- Small manufacturers;
- Hotels and restaurants; and
- Professional and service sectors.

It is important to be aware that the types of businesses using the service can have implications for service design. Tonnage throughput is likely to vary by season when a significant portion of business comes from seasonal sectors such as gardening or the hotel trade. Business type can also determine what kinds of materials are accepted on site.
2.2.3 *Which materials to accept*

Discussions with potential customers can help to inform which sectors are likely to use the service, and which materials should be accepted. As a minimum it would be expected that a provision for standard dry recyclable materials, such as paper, card, glass, metals and plastics, would be made, yet there could also be benefits to accepting other materials as well.

Most businesses are likely to require an outlet for residual waste, as well as common trade specific materials. For example, Hampshire County Council found that over the course of a year, garden waste from professional gardeners accounted for around a third of all trade waste accepted at site. Builders are also a common user of trade drop-off services, so accepting building waste such as rubble and WEEE would appeal to a significant portion of the market.

Pricing structures and similar mechanisms can be used to incentivise or discourage collection of certain materials. Local authorities can differentiate their charges so long as they are *reasonable and adequately cover* their costs. The example below details how Warwickshire County Council uses a permitting scheme to incentivise the capture of recyclables. Similarly, Norfolk County Council charges a high price on materials such as plasterboard that are costly to dispose of, whilst providing lower prices for recyclable materials.

Some of the main considerations for which materials to accept include:

- What materials do businesses want to recycle/ dispose of?
- How will making provision for a wide range of materials help to extend the customer base?
- Which materials will provide a net financial benefit or cost?
- What space is currently available for additional containers?

**Practical Example: Warwickshire County Council – Commercial recycling permits**

Warwickshire County Council provides annual permits for traders wishing to recycle certain materials. The permit, which costs £40 for 12 months, allows businesses unlimited use of the centres to recycle cardboard, glass containers, recyclable paper, plastics, metal and textiles.

Whilst Warwickshire found that its standard drop-off service for other materials, which is charged for by the tonne, was a service with a relatively small amount of take up, the permit scheme proves to be popular, offering a ‘win-win’ situation. The authority has seen an increase in recyclable tonnage throughput and businesses are able to use an affordable and convenient service.

2.3 *Increasing recycling and re-use opportunities*
**Practical Example: Somerset Waste Partnership**

The [Somerset Waste Partnership](#) and [Surrey County Council](#) provide advice for businesses on their websites on how to reduce their waste and recycle more. Both sites have a selection of tips, advice on Duty of Care and posters which can be downloaded for use. Examples of documents can be found in Appendix C.

If SME services are to be provided at, or adjacent to, HWRCs with existing re-use areas, then it may be possible to include re-usable business items, depending on space at the site. If tradesmen such as plumbers, small builders and house clearers use the site regularly, then offering reclamation services may be a sensible option.

Working in partnership may be another way that you can access the market and provide a comprehensive service to customers. For example, many local authorities work closely with civil society organisations to provide household recycling, re-use and repair activities such as computer and furniture refurbishment and resale. Could similar opportunities be developed for C&I waste?

**Practical Example: Warwickshire County Council Re-use Centres**

[Age UK Warwickshire](#) operates re-use Shops at eight of the council's nine HWRCs. As well as accepting good quality re-usable items from householders the re-use shops also take good quality re-usable items from businesses. Items are accepted at the discretion of the shop staff and have included office furniture, shelving and racking.
3.0 **Key additional costs**
For the adaptation or expansion of an existing site, inevitably there will be some expenditure required. This section outlines some of the typical areas of cost. We have provided high-level information on items to consider but, of course, your actual costs will depend on individual circumstances.

3.1 **Set up costs - adding C&I to existing HWRC services**
Existing sites will have most of the expensive capital items already in place, such as containers, hard standing and fencing, which a new site would require investment in. However, there may be additional capital expenditure required when existing sites are used, which, relative to other costs, is low.

### Additional capital costs could include:
- Additional equipment, such as containers, bays or new machines, depending on the amount of 'new' waste taken to the site.
- New signage to ensure C&I waste areas are clearly marked and that site prices, rules and processes are clearly communicated. A site information board is likely to cost around £500 including installation.
- Monitoring and enforcement systems such as an ANPR (Automatic Number Plate Recognition) or vehicle barriers. Approximately £18,000 for a basic package.
- IT systems such as payment machines or devices to record customer and tonnage data - IT costs at two HWRC sites in London cost £2,700, with £88 per month spent on internet provision and upkeep.
- Weighing equipment: the cost of a platform scale, which is suitable for weighing bulk bags, starts at around £500 for a basic model. These types of scales would need to be located in a covered area as they need to be kept dry and out of direct sunlight. A full weighbridge is likely to cost in excess of £40,000 for pit mounted, and roughly half that figure for surface mounted.
- Vehicle barrier for re-routing traffic: standard manual barrier can cost from £500 excluding installation.

3.2 **Key additional operating costs to consider**
Additional operating costs at existing sites are likely to be quite small. This is because, as most of the infrastructure is already in place, there should be only minor increases in expenditure.

### Existing operational costs could increase
These include:
- Additional staff, such as a weighbridge operator or additional site attendants. There may also be additional staffing costs in the form of administration required to process paperwork and compile tonnage reports.
- Training, both initially and ongoing, to ensure that staff separate materials, as needed, and enforce legislative responsibilities such as ensuring all traders have a valid carriers license and duty of care.
- Additional repairs and maintenance to equipment and infrastructure due to increased throughput. This may also include ongoing maintenance, calibration and certification of weighting equipment where this has been introduced.
- Additional security, which may be required if cash is being handled on site.
- Marketing and communication costs, which could include a new website or other digital marketing strategies, leaflets and flyers, and staff time.
- Additional container and / or haulage costs associated with an increase in material tonnage through the site.
4.0 **Charging mechanisms**

4.1 **Practical solutions to allow charging**

Practical solutions have been devised by local authorities to allow them to charge SMEs so that they can have access to C&I drop-off centres. The WRAP HWRC Survey found that of the 15 local authorities that allowed SMEs to use their HWRCs:

- 6 charged by weight (all had access to a weighbridge);
- 6 allowed some recyclables to be dropped off for free;
- 8 charged by item/volume;
- 1 used pre-paid sacks; and
- 1 used an annual permit scheme.

The following section looks at the two most common barriers to accepting SME waste at HWRCs and offers some potential solutions:

- How to **measure** the quantity of waste brought; and
- How to accept **payment**.

### 4.1.1 Barrier: No method of accepting payment on site

**Solution: Free recycling**

No charge is levied for materials separated for recycling where income is made from the sale of the material. A charge could be made for residual waste and other materials (if accepted) by using pre-paid sacks for example.

Where free recycling is offered, it is advised that some level of inspection is carried out by site operatives to discourage users from depositing contaminated recyclables that would otherwise attract a charge.

<table>
<thead>
<tr>
<th>Pros:</th>
<th>Cons:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overcomes barriers associated with lack of weighbridge and lack of infrastructure for accepting payment on site</td>
<td>If material markets are low then there is a risk of reduced/no/negative income</td>
</tr>
<tr>
<td>Encourages recycling</td>
<td>Contracts may need to be reviewed depending on recycling/residual tonnages received</td>
</tr>
<tr>
<td>Legitimises common practice where micro businesses are bringing household-type materials to be recycled</td>
<td>Off-site administration will still be needed if residual/other chargeable recyclables are accepted</td>
</tr>
</tbody>
</table>

**Practical Example: Pembrokeshire County Council**

Pembrokeshire County Council allows small businesses to bring recyclables to its HWRCs for free, but charges for non-recyclable items and residual waste by unit or load. Mixed loads of recyclable materials must be segregated on site.
Note: Pembrokeshire also uses pre-paid sacks for smaller quantities of residual waste.

Solution: Pre-paid sacks

The customer buys sacks from the authority to store their materials in and take to the drop-off centre. This could be mixed recyclables, or for segregated recyclables or residual waste, depending on what materials are accepted.

Pros:
- Overcomes barriers associated with lack of weighbridge and lack of infrastructure for accepting payment on site
- Ideal for customers who generate small quantities of waste

Cons:
- More suited to a commercial mixed recycling waste stream or residual waste:
  - Mixed recycling - requires sorting to maximise revenue.
  - Residual waste – a cost, not revenue.
- Staff need to monitor that the sacks are deposited and not emptied at the centre for re-use

Practical Example: Warwickshire County Council

Warwickshire County Council provides pre-paid sacks - ideal for small amounts of non-recyclable business waste.

Pre-paid sacks for non-recyclable waste can be purchased at four HWRCs and can be used at all but one HWRC within set commercial waste operating days and times. Sacks are 80 litre in size and are sold in batches of 20 at a cost of £60 (equivalent of £3 per sack).

4.1.2 Barrier: No weighbridge

Where a weighbridge is not available, consideration should be given to the purchase or hire of a platform scale. This is a relatively low cost option that will allow items such as sacks of waste or recyclables to be weighed, enabling customers to be charged on a weight basis. Other items may still need to be charged for on a container or volume basis, depending on the material and the quantity. For example, if waste is brought to a site uncontained, then charge by volume will be more appropriate.

Solution: Pay by item, container or volume

The customer is charged a fixed price per item e.g. fridge, per container type e.g. sack, or by volume e.g. small van load/part load. Payment options are discussed further in Sections 4.2 and 4.3.
Pros:
- Overcomes barriers associated with lack of weighbridge
- Clear pricing structure for single items
- Possible to apply differential charging to incentivise recycling over disposal

Cons:
- Can be complex to calculate volume for part vehicle loads and if many container types are permitted
- Need to ensure consistency between unit sizes e.g. how big is a sack or crate?
- Clear guidelines and adequate staff training will be required to reduce the risk of customer dissatisfaction as well as inconsistency between staff members

Practical Example: Somerset Waste Partnership
Viridor, which runs the HWRCs for the Somerset Waste Partnership, introduced a pay by volume structure at HWRCs with no weighbridge in March 2012. Payment is calculated by vehicle size or unit (item or volume equivalent to a builder’s rubble sack); an example price list together with terms and conditions for the site use, including a clause on discretion of pricing, can be found here.

Business users can bring commercial waste to the sites using a wide variety of vehicle types, including a van up to 3.5T GVW.

Solution: Subscription
The customer pays an annual/six-monthly fee at a rate determined by quantity/material.

Pros:
- Easy to administer, one-off payment, which is managed off-site (i.e. at a central office)
- Overcomes barriers associated with lack of weighbridge and lack of infrastructure for accepting payment on site
- Guaranteed annual income

Cons:
- Depending on the fee structure, customers that visit the centre less frequently and/or with less materials may be subsidising other customers
- Potential to issue a subscription for a set number of visits or a set amount of time e.g. pay in advance for a pass card which is valid for 10 trips and stamped each time it is used

Practical Example: Warwickshire County Council
Warwickshire County Council provides Commercial Recycling Permits for recyclable business waste.

Businesses can purchase a permit which allows them to take a range of recyclable materials into any of Warwickshire’s HWRCs as often as they like. The permit is available on application to the council, lasts for 12 months and costs £40. Payment is currently made by card or cheque and can be made over the phone. The scheme is
Solution: Linked with commercial waste collections

The customer pays for a commercial residual waste collection from the local authority and is able to dispose of recyclables for free at local HWRCs and Household Bring Sites.

Pros:
- Easy to administer, providing customers can prove they pay for the commercial collection service
- Overcomes barriers associated with lack of weighbridge and lack of infrastructure for accepting payment on site
- May be an incentive to become a collection customer – particularly micro SMEs who produce limited quantities of material

Cons:
- Limited to customers of the local authority’s commercial waste collection
- Customers must be able to recycle enough to reduce their residual waste bin size before they see a cost benefit
- Recycling collections may be more convenient for some customers

Practical Example: The Highland Council

The Highland Council provides this additional service for its commercial waste collection customers to encourage them to recycle more and reduce the size of their residual waste bin. Customers receive a waste transfer note which allows them to deposit an amount of recyclable material equivalent to their contract amount at a local HWRC or bring site for free.

4.1.3 Identification of business users

Where a charge is made to SMEs using HWRCs, it is important to be able to identify business users from householders to ensure that they are accessing the site legitimately. It is often easier to identify some types of business users owing to the types of vehicles used and many schemes common at HWRCs are based on this.

Options include:
- Use of ANPR to detect regular users;
- Use of permit systems and disclaimer forms for trailers and vans;
- Use of meet-and-greet staff and/or height barriers; and
- Staff training and awareness on how to identify and manage C&I users.

It is important to consider how policies are enforced and how staff will be supported in doing this.
4.2 Price setting - What to charge to ensure a viable service

To provide a viable service, the charges levied for the use of the service must cover the additional costs of providing the service. This should include consideration of the income from material sales (recycling and re-use) and possibly from the sale of sacks etc; and the costs associated with treatment/disposal gate fees, capital, and operational costs. We recommend that you regularly review your costs and revenue to assess the service's viability, see Section 5.0.

The key additional capital and operational costs are discussed in 3.0. The sale of recyclable materials, and the treatment and disposal of non-recyclable materials, will most likely already be covered by existing contracts with either material off-takers or the incumbent HWRC contractor. However it is recommended that contracts be examined and adjusted as appropriate. Information regarding contracts and material markets in relation to HWRCs can be found in Section 6 of WRAP's HWRC Guidance, much of which is applicable to C&I waste.

4.3 Options for accepting payment

4.3.1 Taking payment and registering customers

WRAP's HWRC Survey highlighted taking payment and registering customers as one of the main barriers to allowing SMEs access to HWRC services, with 56% of the authorities that did not allow SME access citing how to accept payment' as a barrier. Issues included not wanting to handle cash on site, and insufficient or lack of Wi-Fi signal or mobile data to allow the use of electronic payment options. This section provides recommendations based on examples from local authorities who have overcome this barrier.

There are three main options:

- On site payment using cash, card, cheque;
- Payment on account; and
- Pre-payment using pre-paid sacks or subscription.

**On site payment**

Some centres provide an 'at point of use' service whereby the customer can turn up (and pay) without pre-registering. However, documentation regarding the payment transaction needs to confirm that the customer has complied with any Duty of Care requirements, which may slow down the process. SUEZ Recycling & Recovery UK, waste services contractor for South Gloucestershire Council, accept C&I waste at their two co-located Waste Transfer Stations and operate a system that allows users to pay at the point of use as well as on account. Regular cash users are encouraged by site staff to set up an account to enable the user to access the service at the rate applied to account customers which is more favourable. C&I waste is not accepted at the other HWRC sites across South Gloucestershire.
Cash and cheques

<table>
<thead>
<tr>
<th>Barriers:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Issues with security of both staff and the cash/cheques on site</td>
</tr>
<tr>
<td>• Daily secure transfer required</td>
</tr>
<tr>
<td>• Administrative burden to authority – banking and finance systems</td>
</tr>
<tr>
<td>• Open to abuse, and there may be issues with auditing and bounced cheques</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Solutions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Credit/Debit card/App</td>
</tr>
<tr>
<td>• Where electronic payments are not possible, move to pre-paid and account options</td>
</tr>
</tbody>
</table>

Credit/Debit Card/App

<table>
<thead>
<tr>
<th>Barriers:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Incurs a fee per transaction</td>
</tr>
<tr>
<td>• Processing equipment can be costly (hand held card swipes have a monthly hire fee of around £17)</td>
</tr>
<tr>
<td>• No signal or internet connection on site</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Solutions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consider pre-paid and account options</td>
</tr>
</tbody>
</table>

Practical Example: Staffordshire County Council

Staffordshire County Council provides recycling and waste disposal services at 13 of their 15 HWRCs. The core customer base is tradesmen e.g. small builders. Customers simply report to the weighbridge on site and a staff member then assesses their load. Payment is by card only - no cash or payment on account.

Payment on account and prepayment options

For these options customers are required to register with the authority before they can start using the service. This ensures that waste carriers licences can be checked and waste transfer notes organised in advance. The table below outlines the key advantages and considerations of pre-use registration.
Account (pay on invoice)

**Barriers:**
- Administration required in handling the account and recording centre use
- Payment terms e.g. pay as you go for ‘new’ customers, 15 days, 30 days, etc.
- The delay in receiving actual payment if terms are based on use after the service e.g. 30 days
- Finance administration including credit control
- Potential for bad debt
- The need for systems to identify customers and attributing their account with the correct details e.g. via vehicle registration, swipe cards etc.

**Solutions:**
Consider pre-paid options

**Practical Example: Angus Council**

Angus Council started accepting C&I waste from SMEs at its HWRCs in 1996. C&I waste is accepted at all seven HWRCs, none of which has a weighbridge. The quantity of C&I waste is calculated on the basis of vehicle size. Users can buy a waste disposal ticket online, selecting from four sizes of vehicle options. The ticket is then emailed to the user who is required to print the email before taking their waste to the HWRC.
5.0 **Monitoring and continuous improvement**

It is important to monitor and evaluate your service in order to ensure that:

- Your service remains competitive;
- Customers’ changing demands are being met; and
- The service is operating as efficiently and cost effectively/profitably as it could be.

Table 2 provides a summary of what should be monitored and why. It also provides some suggestions about how this might be achieved.

<table>
<thead>
<tr>
<th>Table 2 Monitoring for continuous improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What?</strong></td>
</tr>
<tr>
<td>Health &amp; Safety</td>
</tr>
<tr>
<td>Operating costs, material income/ income and charges</td>
</tr>
<tr>
<td>Customer numbers – daily and seasonally</td>
</tr>
<tr>
<td>Material tonnages</td>
</tr>
<tr>
<td>Contamination</td>
</tr>
<tr>
<td>Residual waste composition</td>
</tr>
<tr>
<td>Customer satisfaction</td>
</tr>
</tbody>
</table>
### What?

<table>
<thead>
<tr>
<th>Customer profile</th>
<th>Changes in law/regulations</th>
<th>Sales &amp; marketing</th>
</tr>
</thead>
</table>

### Why?

- Marketing purposes
- Ensure continued compliance
- Impact of campaigns

### How?

- Customer sign up, site surveys
- Environment Agency/DEFRA/CIWM
- Tonnages
- Customer numbers
- Site surveys

---

**The following guides have useful information on monitoring:**

- Section 3 of WRAP’s HWRC Guidance;
- Chapter 7 of WRAPs Commercial and Industrial Collections Guidance; and
- WRAP’s guidance on monitoring and evaluating household recycling services.

Much of this guidance contains information which is applicable to C&I waste and recycling services.
6.0 Addressing operational barriers

6.1 Options for measuring waste accepted from SMEs

Measuring the quantity of different materials being accepted onto your site from SMEs is an integral part of understanding and managing your service. In the HWRC Survey this was cited by 28 authorities as a barrier to working out appropriate charges and therefore a barrier to accepting C&I waste. This section provides an overview of the key operational barriers experienced by local authorities, together with potential solutions and practical examples. Results from local authorities on the HWRC survey indicate that:

- 6 have weighbridges;
- 3 have separate bays;
- 9 estimate tonnages;
- 1 uses an app that generates material costs and tonnages; and
- Some use transfer notes and ‘average weights testing’ to monitor tonnages.

Where a weighbridge is available, its use for C&I customers will mean that an accurate record of tonnage can be recorded. It should be noted that it is illegal to operate a chargeable weighbridge without a Certificate of Competence - more information can be found here: https://www.gov.uk/weighbridge-operator-certificate. See Section 3.0 for more details.

**Practical Example: Buckinghamshire County Council**

Buckinghamshire has 10 HWRCs, five of which have weighbridges. Only these sites are listed on the council’s commercial waste pages as accepting C&I waste. Where there are several separated waste streams in the vehicle, these are weighed and tipped separately. This allows trade tonnages to be recorded into WasteDataFlow.

From an operational perspective, local authorities considering accepting C&I waste at HWRCs, mixed with household waste, could review how best to estimate the tonnages of each in order to accurately report to WasteDataFlow. There are a number of alternative ways of estimating the separate tonnages when a weighbridge is not available. Details on the legal requirements of data recording are provided in Section 8.6.

6.1.1 Item, unit or volume based weights

Items and units require an agreed average weight per item or unit to be used. The **Furniture Reuse Network Product Weight Protocol** may be useful as a source of information on the weights of 200+ furniture and electrical items. For units such as a ‘builder’s rubble sack’ these can be determined by calculating the average weight of a

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4 The protocol can be purchased from Reuse Network by emailing info@reuse-network.org.uk, with an annual licence fee of £300+VAT.
sack of each material accepted over a period of time. Where volume is known, the weight can be calculated using an agreed bulk density for each material.

**Practical Example: Norfolk County Council**

Norfolk County Council accepts C&I waste from SMEs at seven HWRCs, none of which has a weighbridge. Materials are recorded and charged on a volume basis. The percentage fill of each material within the vehicle is recorded for each size of vehicle accepted on site, up to a limit of 3.5tonnes GVW. This information is then provided to head office where administration staff calculate the weight of material accepted using a mass balance approach. The C&I tonnage is deducted from the total HWRC site tonnage to arrive at the commercial tonnage figure for reporting purposes.

6.1.2 Average weights

Where C&I material can be brought to site without payment or permits, a figure must be calculated for household / non-household split. This could be calculated by user surveys where all materials brought onto site by customers are weighed for a set period. A ratio of household tonnage to non-household tonnage can then be calculated and applied to tonnage figures for reporting purposes. If the customer base changes substantially this will need to be taken into consideration.

**Practical Example: Angus Council**

Angus Council started accepting C&I waste from SMEs at its HWRCs in 1996. It has used a system of percentage split of household to commercial waste since that time. C&I waste is accepted at all seven HWRCs, none of which has a weighbridge. The quantity of C&I waste is calculated by applying a % split to each material stream accepted, based on the proportions of commercial to household waste that has been observed since 1996.

6.2 Health & Safety and security

**Health & Safety** is an integral consideration when planning, operating and evaluating your site and is important for those who use the site and for those working at the site. While Health & Safety should always be a priority, with suitable systems in place, it should not prohibit the acceptance of C&I waste at HWRCs.

While any change in site use requires a review of site risk assessments and of Safe Systems of Work, consideration should be given to the potential for increased risks on site associated with:

- Potential increase in traffic flow, vehicle movements and on-site parking;
- Allowing larger vehicles access to the site; and
The Waste Industry Safety and Health Forum (WISH) has been established to ‘identify, devise and promote activities to improve industry health and safety standards’. Together with the Health and Safety Executive (HSE), WISH has developed a number of guides which may be useful.

<table>
<thead>
<tr>
<th>Useful Health &amp; Safety Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>■ HSE – Civic Amenity (CA), Bring Sites and HWRCs</td>
</tr>
<tr>
<td>■ Managing Health &amp; Safety at Civic Amenity Sites (Waste 26)</td>
</tr>
<tr>
<td>■ Safe Transport at Waste and Recycling Sites (Waste 09)</td>
</tr>
<tr>
<td>■ Safety at ‘bring sites’ in the waste management and recycling industries (Waste 11)</td>
</tr>
</tbody>
</table>
Security is important in order to protect your facilities, equipment, materials, staff, and customers. Any liability could result in significant financial and reputational damage. WRAP’s HWRC Survey 2017 cited ‘how to accept payment’ as a barrier to allowing SMEs to access HWRCs, with cash handling being a concern. Where on-site payment and/or cash handling is to be introduced, the following should be considered:

- Use CCTV as a deterrent as well as to provide evidence in the event of any incident.
- Use ID tagging/smart water for IT equipment (card reader, computer etc.).
- Do not allow cash to be left on-site overnight. Highlight this through signage.
- Ensure that all customer records are appropriately secured.
- Consider use of site security patrols or use of dedicated security staff where a need is identified.
6.3 Signage
Clear and appropriate signage at facilities is important to direct users around the site; communicate health and safety messages; and tell users how to use the facilities e.g. what materials to put where, and what is considered a potential contaminant.

**Figure 3** HWRC signage showing clearly defined routes for Commercial and Household Customers.
Source: Eunomia, LB Richmond HWRC, 2012

Signage should be reviewed to ensure that it provides appropriate additional information for SME users, without being overwhelming. Depending on your proposed site layout, this may include additional exterior signage to communicate:
- Directions onto the site where these differ from household users;
- Opening hours for SMEs;
- Services available for SMEs; and
- SME specific site rules and cautions e.g. report to the weighbridge/pull over into the SME area etc.

Additional SME on-site signage could include:
- Directions to the dedicated SME area; and
- Scale of charges and charging policy.

It is recommended that the Recycle Now logo and associated iconography continues to be used for SME signage as it is widely used and recognised. More information on this is in Section 7.1.
6.4 Optimum site layout and avoiding congestion

Getting the layout right and controlling congestion is important for a number of reasons, including health and safety, better traffic flow and improved customer experience. WRAP’s HWRC Survey 2017 highlighted site congestion and layout as key barriers for 27 authorities to allowing SMEs to access HWRCs. Recommendations for overcoming these barriers include:

- Restricting the size of trailers where turning space is limited;
- Restricting the size of vehicles entering the site to 3.5 tonnes GVW;
- Using the pricing structure to discourage large quantities of waste being delivered (and by extension the use of large vehicles);
- Allowing ‘unusual vehicles’ such as large horseboxes by appointment only;
- Having a webcam on site so that users can see in real time how busy it is and plan their attendance accordingly;
- Only allowing SMEs to use sites Monday to Friday;
- Height barriers and meet-and-greet staff; and
- A holding area for taking payment and checking Duty of Care documentation.

**Practical Example: Buckinghamshire County Council**

Buckinghamshire County Council has recently installed a webcam facility on all sites so customers (including traders) can see when sites are busy. Traders are also familiar with peak times so they avoid these. Each year, a satisfaction survey is undertaken throughout October. The last survey found that most customers do not need to wait, and where there is a waiting period, this is five minutes or less (survey covers all site users).

6.5 Provision of additional storage capacity

Where additional storage capacity is required due to an increase in site throughput (as a result of allowing SMEs to access a HWRC), consideration will need to be given to the provision of either additional containers or additional haulage, or both.

Where space is not available for additional material in bays or additional containers, these will need to be emptied or changed over. This will result in a requirement for additional haulage capacity and potential increase in vehicle movements to and from the site, which may be a planning consideration. Where space is available and additional material and containers can be accommodated, this may be a viable option. However, both options will result in additional costs to the operator.

Containers chosen to store materials must be fit for purpose and appropriate for the waste materials. Different types of waste container range in size from wheeled bins to 40 cubic yard roll-on-roll-off skips. Some examples are shown in Figure 4.
Points to consider when choosing additional containers

<table>
<thead>
<tr>
<th>Material accepted:</th>
<th>the number and types of materials accepted influence the container type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size of HWRC:</td>
<td>small sites may require more frequent emptying of smaller containers</td>
</tr>
<tr>
<td>Health &amp; Safety:</td>
<td>there will be additional health and safety considerations due to new container types being used on site</td>
</tr>
</tbody>
</table>

Figure 4 A variety of containers for C&I waste types. Source: Eunomia, Duns HWRC, 2017

6.6 Opening times

It is important for sites to be open at hours that are convenient to your customers. Some centres operate different opening times for SMEs and for householders. For example, Hampshire County Council and Warwickshire County Council only allow SMEs to access the HWRCs during week days and not at the weekend or Bank Holidays, while householders may access the HWRCs throughout the week. The London Borough of Hounslow's SpaceWaye Recycling
Centre is open to trade customers for one hour less in the afternoon than it is for householders.

**Further information may be found within:**
- Section 4 of the WRAP HWRC Guidance – Site operation and infrastructure
7.0 Other information & advice
7.1 Promoting C&I Drop-off centres to SMEs

Increasing the use of a drop-off centre will be self-generating e.g. through enquiries and word of mouth, particularly if your service is appreciated by customers. For the service to be successful, it is important to be proactive with sales and promote the service effectively, especially when launching it for the first time. However, it is also important that this is kept manageable and in-line with the scale of use that is expected, so as not to spend resources disproportionately. Key elements to consider include:

- Developing specific, measurable, achievable, realistic and time-bound (SMART) aims and objectives for any marketing activities;
- Identifying the target audience e.g. sectors and materials, geographical area etc.;
- The key messages that you want to communicate e.g. flexible opportunities to recycle etc.;
- Using a mix of channels suitable for the locality and target audience;
- Developing communications materials; and
- Putting in place simple evaluation tools to measure the impact of your promotion, without the evaluation becoming a job in itself.

The success of your promotion will depend on a wide range of interconnected factors, for example: the clarity of promotional literature, the effective placement of advertising, the accuracy of postal and e-mail databases, the timing of activities, and the target audience’s perception of your service offering. There are some key points to consider:

- No single technique will be effective on its own – a mix of channels and techniques may work with different types of companies or in different situations at different times;
- Publicising the service before it begins accepting waste from SMEs (as early as two months prior);
- The need for ongoing promotion;
- Making contact with the key decision-maker in a company - this may take repeated attempts;
- Using partner organisations (or other local authority departments) to raise awareness of and publicise the site; and
- Simple messaging that focuses on a couple of key points e.g. cost savings and convenience.

Figure 5 Front cover of Hampshire County Council’s Leaflet on Trade Waste
Different publicity techniques are discussed in greater detail in WRAP’s Commercial and Industrial Collections Guidance - Sales and Marketing chapter and include face to face promotion; mail shots; ideas for promotional literature, such as that shown in Figure 5; tips for advertising and promoting the service; use of website and social media; and use of networks and promotional staff.

Additional information may also be found in the WRAP Good practice guide for providing recycling services to SMEs.

In terms of branding and brand awareness, it is important to have a consistent brand identity across all your marketing and communications materials whether it is on-site signage, your website, or leaflets. Materials should incorporate the Recycle Now branding as mentioned in Section 6.3. The widely recognised, and consumer-tested, Recycle Now branding (as well as other marketing materials and photographs) can be downloaded for free here. All that is needed to access the materials (including downloadable artwork) is your e-mail address.

7.2 Options for C&I third party tipping

Some private sector waste management companies that provide commercial waste collection and skip hire services also offer third party tipping at their Waste Transfer Stations. It may be useful therefore for local authorities to signpost SMEs to these services, especially where large volumes or particular waste streams cannot be accepted at HWRC sites. The Somerset Waste Partnership provides information and links on its Business Waste Services page under ‘Other facilities offered for business waste in Somerset’ to local private sector waste and recycling companies that provide third party tipping.

Waste Transfer Stations operated by local authorities can be used to accept waste directly from SMEs. For example Bath and North East Somerset Council allows SMEs to drop off waste for recycling and disposal at its Bath Transfer Station. Oxford County Council’s HWRC contractor W&S Recycling Ltd accepts SME waste at its WTS adjacent to the Redbridge HWRC.

For authorities looking to introduce C&I waste/recycling bring services at WTSs that are run by private waste management companies, contracts will need to be examined and adjusted as appropriate.

Dedicated drop-off centres are designed for the specific purpose and accept defined materials determined by local market requirements, for example WEEE, furniture and construction, and demolition waste.

They may be co-located with other businesses such as builder’s merchants so that businesses can drop off their waste and buy new supplies at the same time. One example is Thorncliffe Building Supplies Ltd which operates a ‘one stop shop’ in Ewloe.
near Mold, North Wales where there is also a builder’s merchants and skip & waste management company on the one site.
8.0 What the law says

The management of material that is classed as waste is governed by a mixture of legislation and guidance. Household waste, commercial waste, and industrial waste are all forms of ‘controlled waste’ and, as such, are all subject to additional regulations concerning who is allowed to transport and to manage them.

This section provides an overview of key legislation to be aware of when considering whether to allow businesses to deposit waste at a site. Readers should be aware that this section has been written with reference to English law. Northern Ireland, Scotland and Wales often have different legislation, although in most cases the effects of the respective legislation are similar. Key differences are explained in Appendix A.

This section of the guide is not intended to be definitive. When considering offering a drop-off service to businesses, it is recommended that further independent advice is sought from your legal team should any specific questions of law arise.

Figure 6 shows the main questions that an organisation is likely to need to answer when considering allowing SMEs to access sites, and the key legislation that relates to each. The remainder of this section explores some of the legislation in more detail. Further information can be found in Appendix B.
Figure 6 Summary of key legislation

How must your site operate?
- Planning legislation (primarily in the Town and Country Planning Act 1990)
- Planning conditions for your site
- Environmental Permitting (England and Wales) Regulations 2016
- Permit rules for your site

What materials can you accept?
- Environmental Protection Act 1990 and Controlled Waste (England and Wales) Regulations 2012
- Defines what is commercial/industrial waste
- Environmental Permitting (England and Wales) Regulations 2016
- Your permit will specify types of waste you can receive

What are your Duty of Care obligations?
- Environmental Protection Act 1990
- Control of Pollution (Amendment) Act 1989
- Waste (England and Wales) Regulations 2011
  - Waste carrier licence
  - Waste transfer note

Which materials must be separated?
- Environmental Protection Act 1990 and Controlled Waste (England and Wales) Regulations 2012
  - Defines which wastes can be charged for
- Complex areas include construction and demolition waste and waste from student lets

What can you charge for?
- Environmental Protection Act 1990 and Controlled Waste (England and Wales) Regulations 2012
  - Defines which wastes can be charged for
- For all operators of permitted sites: Environmental Permitting (England and Wales) Regulations 2016

What data must you record?
- For all operators of permitted sites: Environmental Permitting (England and Wales) Regulations 2016
8.1 Waste definition
The different types of controlled waste are defined according to the type of premises at which they were produced, subject to Schedule 1 of the Controlled Waste (England and Wales) Regulations 2012.

- Household waste comes from domestic premises, and a few other types of premises such as places of worship and buildings used principally for public meetings.
- Commercial waste comes from premises that are wholly or mainly used for trade, business, sport or recreation – excluding industrial waste.
- Industrial waste comes from factories, mines, quarries and a few other types of premises, including agricultural premises and public transport premises.
  Construction and demolition waste is a type of industrial waste.

Full details of the types of waste that fall within each category can be found in Section 75 of the Environmental Protection Act (EPA) 1990 and Schedule 1 of the Controlled Waste (England and Wales) Regulations 2012.

A key point for local authorities to note is that whereas waste disposal authorities must allow local residents to deposit most kinds of household waste free of charge, they can open HWRCs for the deposit of ‘household or other controlled waste by other persons on such terms as to payment (if any) as the authority determines’. (EPA 1990, S.51 (3)). Local authorities should make sure they have considered what types of waste they may charge for when planning to open an HWRC to C&I waste.

8.2 Planning permission
Like all developments, waste sites are subject to the planning system. There can be planning issues, even if C&I drop off services are being offered at an established site. New sites will need to go through the process of obtaining planning permission from the local authority. A drop-off site will require planning permission, which must be in place before an environmental permit can be obtained, and so planning needs to be considered early on in the process. You can obtain advice on planning permission and submit applications online at https://www.planningportal.co.uk/. Key points to consider include:

- What activities does it permit? Are there any limits, for example, on the materials that can be accepted?
- Are there any other relevant restrictions which may pose an issue if the site is opened up to new customers, such as limits on vehicle movements or operating hours?

8.3 Permitting
Most drop-off sites will require an environmental permit; only a few low-risk waste handling operations can operate under waste exemptions. When considering opening a new or established site to accept C&I waste, do check whether doing so may require a new or amended permit. The appropriate permit will need to be granted before the site starts to accept waste (see the Planning section).
The law governing environmental permits is set out in the Environmental Permitting (England and Wales) Regulations 2016, with advice on interpreting the law available here. The permitting considerations that may need to be taken into account will vary depending on:

- Whether the drop-off centre is new or part of an existing waste management facility;
- the types and quantity of waste being accepted;
- how long the waste is being stored; and
- how it is secured.

There are two types of environmental permits – ‘standard rules’ and ‘bespoke’. The type that is required will depend on where the centre is located and the operations to be undertaken. Most drop-off centres should be able to be covered by a standard rules permit, which is cheaper and quicker to obtain.

Both types of permit require that the site has a technically competent manager. This person (usually a site supervisor) must demonstrate continuing technical competence through an ‘approved scheme’. The approved scheme in the UK was jointly developed by the Chartered Institution of Wastes Management (CIWM) and the Waste Management Industry Training & Advisory Board (WAMITAB).

Application and annual charges are made for environmental permits, and your organisation should take these into account as part of your business plan. A standard rules permit will be lower cost than a bespoke permit.

8.4 Compliance requirements

It is important as a waste site operator that you fulfil your own legal obligations, and help your customers fulfil theirs. The main compliance requirements are summarised in Figure 7.
Figure 7 Summary of Compliance Requirements

| Duty of Care - Waste Carriers | • Check C&I customers are registered as waste carriers (S.34, Environmental Protection Act 1990) |
| Duty of Care - Waste Transfer Note | • Make sure there is a Waste Transfer Note covering every load of controlled waste received, which is kept for at least 2 years (reg 35, Waste (England and Wales) Regulations 2011) |
| Duty of Care - Consignment Note | • Make sure there is a Consignment Note covering every load of hazardous waste received (Hazardous Waste (England and Wales) Regulations 2005) |
| Pre-treatment | • Make sure any waste that is to be landfilled has been pre-treated in order to reduce its volume or hazardous nature, facilitate its handling or enhance recovery |
| Apply the Waste Hierarchy | • Make sure you encourage recyclable waste streams to be separated (reg 12, Waste (England and Wales) Regulations 2011) |
| Facilitate Source Separation | • Provide facilities to allow glass, metal, paper and plastic to be kept separate (reg 13 and 14, Waste (England and Wales) Regulations 2011) |

These requirements are explored in more detail in Appendix B.

8.5 Charging

Local authorities (like private operators) may charge to accept waste deposited by businesses. However, unlike private operators, they are required to accept household waste from local residents free of charge. A key exception is construction and demolition waste, which is classed as industrial waste.

Local authorities should take care over how the regulations on charging are applied. Waste deposited by landlords raises particular issues, which will need close consideration and a clear policy for staff to operate. Where a landlord is arranging the
clearance of premises after a tenancy has ended, the resulting waste is not considered to be household waste. Also, the landlord **might not** be a resident of that local authority area, which may be relevant in terms of a local authority’s policy on access to an HWRC more generally. However, if the waste is not construction or demolition waste, originates from domestic premises used wholly for the purposes of living accommodation, and is being deposited by a landlord **resident in the area**, it may not be permissible to charge for it as it may be regarded as household waste.

8.6 Data recording

Any operators with an environmental permit must complete waste returns to tell the Environment Agency about the waste they have received or removed from their site. This requirement will apply to waste dropped off by SMEs. Information about submitting site returns can be found [here](#).

In addition to these requirements, local authorities are obliged under **The Waste and Emissions Trading Act 2003 (Amendment etc.) Regulations 2013** to submit information to the Environment Agency each quarter regarding the amount of municipal waste they manage. This information is submitted via the web based system WasteDataFlow. C&I waste received at HWRCs must be included in these returns. However, waste that is not from households must be identified separately from household waste. Guidance on completing WasteDataFlow returns can be found [here](#).
Appendix A – Key regulatory differences across the UK

Many issues relating to waste management are devolved to Scotland, Wales and Northern Ireland. As a result, their waste legislation is gradually diverging from legislation in England. However, at present, in many cases, this means that legislation in each country is different by name but has the same substantive effect, and so far the practical implications are quite limited. Nevertheless, users of this guidance in Scotland, Wales and Northern Ireland should be mindful of potential differences.

The regulatory differences with the greatest potential bearing on the interpretation of the guidance above are set out in Table 3 below:

<table>
<thead>
<tr>
<th>Aspect of regulation</th>
<th>England</th>
<th>Scotland</th>
<th>Wales</th>
<th>Northern Ireland</th>
</tr>
</thead>
<tbody>
<tr>
<td>Key environmental regulator</td>
<td>Environment Agency Created by the Environment Act 1995</td>
<td>Scottish Environmental Protection Agency Created by the Environment Act 1995</td>
<td>Natural Resources Wales Created by the Natural Resources Body for Wales (Establishment) Order 2012</td>
<td>Northern Ireland Environment Agency NIEA is an executive agency of the NI Department of Agriculture, Environment and Rural Affairs</td>
</tr>
<tr>
<td>Environmental permitting</td>
<td>System of environmental permits replaced waste management licenses and exemptions in 2007 See: The Environmental Permitting</td>
<td>Mostly retains system of waste management licenses and exemptions See: the Waste Management Licensing (Scotland) Regulations</td>
<td>As England</td>
<td>Retains system of waste management licenses and exemptions See: The Waste Management Licensing Regulations</td>
</tr>
<tr>
<td>Aspect of regulation</td>
<td>England</td>
<td>Scotland</td>
<td>Wales</td>
<td>Northern Ireland</td>
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<td>(England and Wales) Regulations 2016</td>
<td>2011 and Pollution Prevention and Control (Scotland) Regulations 2012</td>
<td>As England Welsh Ministers took powers under the Environment (Wales) Act 2016 to introduce regulations to require greater source separation of commercial waste. No such regulations have yet been produced.</td>
<td>(Northern Ireland) 2003 as amended</td>
</tr>
<tr>
<td>Source separation requirements</td>
<td>Source separation requirements limited to applying Waste Hierarchy, and the separation of glass, metal, paper and plastics by waste collectors, subject to the technically, environmentally and economically practicable (“TEEP”) test. Waste (England and Wales) Regulations 2011 as amended</td>
<td>Waste Hierarchy as England The Waste (Scotland) Regulations 2011 Source separation requirements explicitly extend to food waste as well as dry recyclables. Duty is placed on producers, as well as collectors. The Waste (Scotland) Regulations 2012</td>
<td>As England Welsh Ministers took powers under the Environment (Wales) Act 2016 to introduce regulations to require greater source separation of commercial waste. No such regulations have yet been produced.</td>
<td>Waste Hierarchy as England The Waste Regulations (Northern Ireland) 2011 Separate collection requirements broadly as England, but S.20 of the Northern Ireland regulations classes commingled dry recycling as a form of separate collection.</td>
</tr>
</tbody>
</table>
Appendix B – Specific compliance requirements

Duty of Care

Anyone that produces, stores, transports, treats or disposes of waste must take ‘all measures reasonable in the circumstances’ to prevent or minimise pollution of the environment or harm to human health. This forms part of what is known as the Duty of Care, which is defined by **S.34 of the EPA 1990** and applies to all controlled waste (i.e. household, commercial and industrial waste). Your key responsibilities are to:

- Check that any business customers using the site are registered waste carriers. A check on the customer's waste carrier licence could either be made when they register to use the site or when they arrive at the site. There is a public register of waste carriers in England [here](#).

  - An organisation or person must register as an **upper tier** waste carrier if it transports controlled waste as a commercial venture (even if only occasionally) or if it transports construction or demolition waste.

  - An organisation or person must register as a **lower tier** waste carrier if it:
    - is a charity or voluntary organisation;
    - transports waste it has produced itself (unless this is construction or demolition waste, in which case it is upper tier); and/or
    - collects only certain kinds of waste, such as waste from mines, quarries or farms.

- There is no need to register if an organisation carries only its own waste, and does not do so normally and regularly, so long as it is not construction or demolition waste.

- Put in place a system to issue/receive waste transfer notes or (where required) hazardous waste consignment notes:

  - Complete a waste transfer note when controlled waste is transferred from one party to another, as required by regulation 35 of the Waste (England and Wales) Regulations 2011. Advice is available on the [gov.uk website](#). Generally, a transfer note will need to be completed each time a customer drops off waste; however, if an arrangement is made for the customer to drop off regular quantities and types of waste, an annual waste transfer note could be used:
    - The regulations include specific rules on the information a waste transfer note must record. The easiest way to ensure these requirements are met is to use the standard waste transfer note that can be found [here](#).
◼ Retain transfer notes for two years for audit purposes. (The same obligation also falls on the customer dropping off the waste).
◼ Receive a consignment note for each load of hazardous waste it receives (if relevant). The requirements for consignment notes are set out in Part 6 of the Hazardous Waste (England and Wales) Regulations 2005.
  - Hazardous wastes include healthcare wastes, chemical wastes (e.g. printer toner), waste electrical equipment, and solvents.
  - A consignment note must be retained for five years.

Pre-treatment requirements

Following the principles of the waste hierarchy, if you plan to send non-hazardous waste to landfill, it must be treated first. In this context, treatment means:

“Physical, thermal, chemical or biological processes (including sorting) that change the characteristics of waste in order to reduce its volume or hazardous nature, facilitate its handling or enhance recovery”.

The most common option for treatment is separation for recycling. Typically, this will have been done before the waste arrives at your site. Your organisation should be able to demonstrate that waste received at your drop-off centre for landfill disposal has been treated before you receive it, unless you plan to treat it. It is good practice for a statement on pre-treatment to be incorporated into the waste transfer notes covering the waste you receive.

Specific guidance on pre-treatment of waste for landfill is available here.

Waste (England and Wales) Regulations 2011

In the context of C&I waste and recycling drop-off centres, three main relevant requirements flow from the Waste Regulations.

◼ Regulation 12 requires any establishment involved in waste production or management to take ‘all such measures available to it as are reasonable in the circumstances’ to apply the waste hierarchy. A drop-off centre is likely to achieve compliance with this obligation by:
  o Providing facilities for recycling a wide range of materials
  o Ensuring that it only receives waste that is accompanied by a waste transfer note which declares that the producer has applied the waste hierarchy (see section on Duty of Care)
  o Following guidance on how to apply the waste hierarchy, which is available here.
Regulation 13 requires that waste collectors collect glass, metal, paper and plastic in separate streams, where this is necessary and practicable. Since a drop-off centre is not a waste collector, this rule does not have a direct bearing on such a site’s operations.

However, Regulation 14 states that where glass, metal, paper/card or plastic have been collected separately, they should not then be mixed together. If you propose to receive these materials from businesses, it would be advisable to offer receptacles to allow these materials to be deposited separately from one another, unless an analysis has been carried out to show that doing so is not necessary to improve recovery.

Advice on the meaning of the key terms in the Waste Regulations can be found in the Waste Regulations Route Map.
Figure 8 Somerset Waste Partnership Business Recycling Directory

Right click the image and select ‘open hyperlink’ to view the document

Business Recycling Directory for Somerset

This directory is produced by Somerset Waste Partnership (SWP) which is the local authority teams managing household waste and recycling services on behalf of all councils in Somerset.

www.somersetwaste.gov.uk
Managing your waste
A guide for Surrey businesses

www.surreycc.gov.uk
Making Surrey a better place