



PriorityWaste[®]

Your waste is our priority

PRIORITY WASTE – DUTY OF CARE WASTE HANDLING POLICY

Version: 1.0

Issued: 20/10/25

Approved By: Nikolay Tovirov – Operations Director

Next Review: 20/10/26

1. Purpose

The purpose of this policy is to ensure Priority Waste complies with its legal Duty of Care under the Environmental Protection Act 1990, the Waste (England and Wales) Regulations 2011, and all associated hazardous waste regulations.

This Duty of Care requires the company to:

- Handle waste safely and correctly
 - Prevent harm to human health or the environment
 - Ensure waste is stored, transported, and disposed of legally
 - Maintain accurate documentation and audit trails
 - Work only with authorised carriers, brokers, and disposal sites
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2. Scope

This policy applies to:

- All operational staff, including drivers, warehouse staff, and chemists
 - Sales, admin and logistics personnel involved in waste bookings
 - Any contractors working on behalf of Priority Waste
 - All waste types handled by the business (general, hazardous, WEEE, clinical, liquids, oils, chemicals, sharps, etc.)
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3. Duty of Care Legal Requirements

Priority Waste must ensure:

- Waste is correctly classified and described
- Waste is only passed to authorised carriers or facilities
- All movements are accompanied by correct documentation (WTN/HWCN)
- Waste is stored securely, safely, and appropriately
- A clear audit trail is maintained for every collection
- Waste is not mixed or handled incorrectly
- All activities prevent pollution, harm or escape of waste

Failure to follow these requirements places the company at legal risk.

4. Waste Classification & Description

Before any collection, the following must be confirmed:

- Correct waste type and EWC code
- Hazards associated with the waste (HP codes)
- Quantity, packaging and condition of containers
- Whether specialist PPE or chemist attendance is required
- Whether the waste is acceptable to the supplier/facility

Sales and admin must ensure customers provide full information, including MSDS where relevant.

5. Storage & Handling of Waste On Site

All waste stored at Priority Waste must be:

- Segregated by waste type
- Kept secure to prevent leaks, spills or environmental harm
- Stored away from drains, ignition sources, or walkways
- Correctly labelled and accompanied by documentation
- Positioned safely on bunds when hazardous liquids require containment

Quarantined or suspect materials must be placed in a designated secure area until assessed.

6. Driver & Operational Responsibilities

Drivers and operatives must:

- Visually inspect waste before loading
- Refuse waste that is incorrectly packaged, unsafe, mislabeled or non-compliant
- Ensure vehicles are loaded safely and securely
- Complete or obtain signatures for WTN/HWCN documentation
- Inform the office immediately if the waste differs from the booking
- Follow all site rules at customer premises
- Report concerns, damaged containers, or incorrect waste descriptions

Drivers must never collect hazardous waste that is unsafe or not as described.

7. Documentation Requirements

All waste transfers must have the correct documentation:

For General Waste: Waste Transfer Note (WTN)

For Hazardous Waste: Hazardous Waste Consignment Note (HWCN)

For WEEE: WEEE documentation and tracking

These must:

- Accurately reflect waste type, quantity, container, and EWC code
- Include all required signatures (including Part E for hazardous waste)
- Be uploaded to the customer portal promptly
- Be retained for a minimum of 3 years

Missing or incorrect documentation is a breach of Duty of Care.

8. Working with Suppliers, Carriers & Disposal Sites

Priority Waste will only use suppliers who:

- Hold valid waste carrier, broker or facility permits
- Are authorised to handle the specific waste being sent
- Provide evidence of compliance and acceptance criteria
- Follow Duty of Care requirements

Supplier audits and spot checks will be carried out where necessary.

9. Non-Conforming Waste

Examples include:

- Wrong EWC code provided
- Not packaged or labelled correctly
- Liquids in unsuitable containers
- Chemicals not accompanied by MSDS
- Waste differing from customer description
- Unsafe to load

If non-conformance occurs:

- Driver must stop work and contact the office
 - Waste may be refused or quarantined
 - A NCR (Non-Conformance Report) will be raised
 - Customer must provide corrective information
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10. Customer Responsibilities

Priority Waste will remind customers that they must:

- Provide accurate waste descriptions
- Ensure waste is packaged safely and legally
- Supply MSDS for chemicals
- Follow site storage rules
- Facilitate safe access for drivers

If they fail to do so, the collection may be refused.

11. Staff Training

All relevant staff will receive training in:

- Waste classification
- Duty of Care responsibilities
- Safe loading and waste handling
- Documentation requirements
- Hazardous waste compliance
- Customer communication protocols

Refresher training will be provided annually or when regulations change.

12. Monitoring & Compliance

The Operations Director will ensure:

- Internal audits of waste documentation
- Random checks on supplier paperwork

- Monitoring of driver compliance
 - Review of any NCRs or incidents
 - Immediate corrective actions when breaches occur
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13. Non-Compliance

Failure to follow this policy may result in:

- Environmental harm
- Legal action from regulators
- Fines for Priority Waste
- Disciplinary action for employees
- Removal of supplier approval

Duty of Care is a legal requirement and must be taken seriously.

14. Review

This policy will be reviewed annually, or sooner if:

- Waste regulations change
 - New processes or waste streams are introduced
 - An incident highlights a need for review
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15. Acknowledgement

All employees must read and understand this policy and follow the PPE requirements at all times.

Signed: 

Nikolay Tovirov
Operations Director
Priority Waste Limited

Date: 20th October 2025