

## Premises Registration Frequently Asked Questions

### 1. What is the situation up to 1 April 2016?

Nothing changes until 1 April. Where 500kg or more of hazardous waste is produced, collected at or removed from premises, the premises must be registered with the Environment Agency. The unique registration number is used by us, in conjunction with consignee returns, to track movements of hazardous waste and to help plan compliance activities.

Premises registration is not a Waste Framework Directive (WFD) requirement. However, the WFD does require us to take the necessary action to ensure waste-traceability from production to final destination and registration of producer premises currently helps the Environment Agency to fulfil this requirement.

### 2. What is the change?

Registration

- Registration will not be required in England from 1 April 2016.
- Legally you are still required to register up until 1 April 2016.
- These changes only apply to England. It does not affect premises in Wales, who should continue to register with Natural Resources Wales.

Consignment Note Code Format

- To accommodate the removal of premises registration, the format of the consignment note code, which appears on every consignment note, will change on 1 April 2016 regardless of the amount of hazardous waste produced, stored or handled.
- From 1 April 2016, if waste is produced in England, the first six characters of the consignment note code (currently the premises registration number) must be replaced by the first six letters or numbers (not symbols) of the business name, example below. The producer should ensure consistent use of the organisation name in this regard.
- 'EXEMPT' will no longer be used.  
The second set of characters will continue to be five numbers or letters of the waste producer/holder's choosing. This may, in a few specified occasions, be followed by an additional letter.

First six characters of the organisation that produced the waste

Any five alpha-numeric characters to give a unique code

**PART A Notification details**

1 Consignment note code: [ ] [ ] [ ] [ ] [ ] [ ] / [ ] [ ] [ ] [ ] [ ]

**Example code**

**PART A Notification details**

1 Consignment note code: E N V I R O / 1 2 3 4 A

### **3. Who is affected?**

The change in registration affects all customers that produce or store 500kg or more of hazardous waste per year.

The change in consignment note code affects all businesses that produce, handle, or manage hazardous waste, not just those producing 500kg or more; they all need to be aware and check they are using the new consignment note code format on consignment notes from 1 April 2016.

### **4. Where can I find further guidance?**

There will be detailed guidance found on gov.uk from 1 April 2016.

### **5. How are you communicating the changes?**

An extensive communications programme has been underway since January 2016.

### **6. Why the change?**

As part of the Smarter Environmental Regulation Review (SERR), Defra has decided to remove the need to register premises from 1 April 2016. Businesses that produce or store hazardous waste will benefit, the savings being both in registration fees and in administration time. Government asked us to find a solution to enable traceability of waste movements solely on the basis on the information sent in the consignee returns.

## **Premises registration**

### **7. Will the definition of a premises change?**

No, this is set out in the Regulations and will not change. It will still be a legal requirement to complete a consignment note when hazardous waste is moved from a premise. The change only relates to the requirement to register those premises.

### **8. If I collect waste from a hazardous waste producer from 1 April, will I need to check they are registered?**

No, because registration will not be required, the prohibition on removal from registered and exempt premises is also being removed. You still have an obligation to check the consignment note is completed correctly, including the new note number format.

### **9. How will it affect mobile service providers?**

The parts of the regulations that affect mobile services are being revoked. If you produce hazardous waste at someone else premises, you are the producer of the waste and therefore your company details should form the first six characters of the consignment note code.

### **10. How does this affect producer returns?**

This should not affect your producer returns. Producer returns will continue to be submitted to the producer of the waste, to the place where the waste was removed from.

### **11. Hazardous waste registrations are valid for 12 months. What if I have less than 500kg on my site ahead of April 1<sup>st</sup> but would normally have registered as will have produced a total of 500kg in 2016?**

Registration is required when a premises produces 500kg or more of hazardous waste in a 12 month period. If your registration lapses before 1 April 2016, and the premises would not have produced 500kg or more in the 12 months up to 31 March 2016, then that premises does not need to be registered. Conversely, any premise that produces 500kg or more of hazardous waste between 1 April 2015 and 31 March 2016 should be registered during this time.

## **Consignment note**

### **12. What happens if I have pre-printed my Consignment notes or if the producer has already entered the old premises registration number as the 1st six characters of the consignment note code??**

From 1 April 2016, using an old premises registration in the consignment note code will not be compliant with the new legal coding standard.

Only the party legally responsible for completion of each part of the note, or a person authorised by them to act on their behalf, can amend parts A, B, C or D. This must be done before certification of that information, and before removal of the waste from the premises listed in A2, or the note becomes invalid.

A consignee must reject the waste if the consignment note appears to have been altered, unless they have contacted the consignor and confirmed that the:

- person responsible for completion of that part, or a person authorised by them, made the amendment
- change happened before the carrier and consignor certified it and
- change happened before the waste was removed

### **13. What do I do if I get to a waste site and they don't accept the new consignment code format?**

The consignee should contact the NCCC for advice.

### **14. What happens if my consignment of waste moves on 31 March using the old note number format and arrives on 1 April, after the change?**

The note was correct at the time it moved, so it can be legally accepted under the old note format on 1 April. Any additional delay is likely to mean that the consignment was not moved without undue delay, contrary to Regulation 45

### **15. How do I generate the consignment note code for non-companies (eg charities), subsidiaries, franchises or companies in receivership?**

You should use the first six letters or numbers (not symbols) of the name of the company identified in part A2 of the consignment note. This should be the legal producer/holder of the waste at the time it is collected. You should ensure consistent use of the organisation name in this regard.

### **16. Why is SIC 2007 being specified for the consignment note?**

We currently accept SIC 2003, SIC 2007 or NACE on the consignment note. The change in the Regulations from 1 April 2016, specifying SIC 2007, will match the requirements for non-hazardous waste. We currently have a [Regulatory Position](#) to allow different SIC publications and the use of NACE codes to be used; we will be continuing to allow the use of NACE.

## **Moving waste across UK borders**

### **17. What if I am receiving waste from Wales into England?**

If you are receiving waste from Wales into England, the consignment note code will not be changed. Welsh producers will still be required to register their premises with Natural Resources Wales and use their registration number in their consignment note code.

**18. What if I am consigning waste from England to Wales, Scotland or Northern Ireland?**

If your waste is moved from England into Wales, Scotland or Northern Ireland from 1 April 2016, the consignment note code will need to use the new format.

**19. Will waste sites in Scotland, Northern Ireland and Wales know how to handle new consignment notes?**

Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency (NIEA) and Natural Resources Wales (NRW) are fully aware of the changes and are undertaking appropriate communications.