

HAZARDOUS WASTE CONSIGNMENT NOTE AUDIT REPORT

eCube Solutions Limited (LB3590HN)

eCube Solutions Ltd, Dragon Way, Bro Tathan West,
St Athan, Barry CF62 4AF

Date of Audit: 05/03/2021

Officers Completing Audit:

Craig Coleman

Site Officers:

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Introduction

In February 2021 Natural Resources Wales requested copies of the hazardous waste notes generated from 01/04/2020 to 30/10/2020 from eCube Solutions Limited to be audited by Hazardous Waste Officers from Natural Resources Wales.

The consignment note procedure is set out in the Hazardous Waste (Wales) Regulations 2005 as amended and must be followed by all parties in the waste movement.

The hazardous waste audit has been carried out:-

- To measure compliance with the regulations;
- To make sure that hazardous waste is managed properly without polluting the environment or harming people's health or seriously affecting the local area;
- To make sure that registers and records, such as quarterly returns from sites that receive hazardous waste are accurate.

Our purpose was to review the company's compliance with environmental legislation and where appropriate to provide advice and guidance to assist in identifying and delivering improvements.

Audit Findings

The main findings of the audit are set out in the following sections. These will be followed by either **Actions** or **Recommendations**.

Actions indicate that we are requiring you to deliver this to meet your legal obligations. In general, these will tell you what you must do, not how to do it. These are not optional, and will normally be supported by:

- a timescale, within which the action must be delivered; and/or
- interim measures, that must be taken until such time as the action is delivered.

Recommendations are not themselves requirements and typically provide further advice and guidance on:

- how to deliver a required **action**, for example we might indicate how another company has successfully dealt with this issue;
- aspects of best practice;
- potential improvements that reduce the risk of problems occurring in future.

1) Hazardous Waste Consignment Note Part A

Consignment note ECUBES/09075 does not list the producers hazardous waste registration on the form.

The other five forms audited had no errors in Part A.

Actions

Hazardous Waste Consignment Note Part A

On future forms, ensure that the hazardous waste producers code is present in Section A.

Recommendations

Hazardous Waste Consignment Note Part A

Inform all brokers and carriers of your hazardous waste producers code prior to completion of Section A and confirm that it will be recorded in Section A of the duty of care hazardous waste consignment note.

2) Hazardous Waste Consignment Note Part B

Consignment note ECUBES/09075 does not list the weight of the waste removed from site. The form states “see below”, but there are no weights listed in Part E.

The other five forms audited had no errors in Part B.

Actions

Hazardous Waste Consignment Note Part B

The weight of the waste being removed from site must be present in both section B and E of the duty of care hazardous waste consignment note. Where no infrastructure exists to weigh the waste, an accurate estimation can be made, if you use conversion factors for volumes of liquids or containers you must ensure that they are reliable.

Recommendations

Hazardous Waste Consignment Note Part B

If the form is being completed by a contractor, communicate to them your weight estimations prior to collection to ensure that this information is present on the duty of care hazardous waste consignment form.

3) Hazardous Waste Consignment Note Part C

Part C has been completed correctly on all six forms audited.

4) Hazardous Waste Consignment Note Part D

Part D has been completed correctly on all six forms audited.

5) Hazardous Waste Consignment Note Part E

Section E has been completed on the four applicable forms audited.

6) Waste Return Data

The waste returns data submitted for Q2 2020 correlates with the information entered on the the duty of care hazardous waste submissions, and also matches that information held within the consignee returns databases held by Natural Resources Wales and The Environment Agency.

Summary

Of the 6 duty of care hazardous waste consignment notes audited against the hazardous waste consignment return data, 5 of the consignment notes were found to be in good order.

Hazardous waste note ECUBES/09075 has not been completed inline with the [guidance](#) provided by Natural Resources Wales. It is the responsibility of the waste producer to ensure that the duty of care hazardous waste note is completed correctly. It is an offence to fail to use consignment notes in accordance with regulation 35 of The Hazardous Waste Regulations (Wales) 2005. Failure to adhere to these regulations in the future could result in a warning, a formal caution, a fixed penalty notice, or prosecution.

eCube Solutions Limited (LB3590HN) is currently not registered as a hazardous waste producer with Natural Resources Wales. The waste registration CAA494 expired on 03/12/2020 and no new registration has been found. eCube Solitions Ltd has continually produced >500kg of hazardous waste in the past 3 years and as such they must [re-register](#) as a hazardous waste producer in Wales. It is an offence to fail to register as a producer in accordance with regulation 21 of The Hazardous Waste Regulations (Wales) 2005.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order.