



ENVIRONMENTAL BRIEFING

Environment Agency – Unannounced Compliance Audits

Summary

The Environment Agency (EA) use unannounced site visits to carry out detailed pollution prevention and waste management audits. Environment Agency inspectors have greater powers of entry than the Police and will carry warrant cards. Unannounced visits may be because of environmental issues or to focus on specific compliance areas. One of our sites recently had an unannounced visit from EA inspectors who carried out a detailed and wide-ranging inspection to check legal compliance for waste management and pollution prevention measures.

As waste producers we have a legal Duty of Care for all wastes we produce – even once the waste has left our site. Failure to comply with these requirements could result in regulatory action including prosecution and fines. During the compliance audit, the EA inspectors carried out a detailed review of waste management and documentation for hazardous and non-hazardous waste. The EA inspectors checked that, for all waste transferred from site, **records were available to demonstrate waste carriers used were suitably licenced, waste transfer notes and consignment notes were available and correctly completed, waste was correctly described and stored, waste was transferred to waste facilities suitably permitted to take the waste being transferred.** The inspection went very well with no non-compliances identified. This was an excellent outcome for the site team and credit to their diligent compliance with waste management. A summary of the waste areas checked and the outcome is shown below.

Compliance Summary		
Compliance check type	Assessed during audit	Non-compliance identified
Check correct EWC codes	Yes	No
Written description of waste including quantity and containment	Yes	No
Time and place of transfer	Yes	No
SIC code of the waste holder	Yes	No
Full details of both transferor and transferee	Yes	No
Producer, importer, carrier authorised to receive	Yes	No
Confirm waste hierarchy has been considered	Yes	No

The Cemex EMS requires that **ALL waste chains are checked and documented in the Waste Management Register SR18**. The columns in the register provide a guide to what information is required including the European Waste Classification codes for wastes commonly sent from our sites. Extra care must be taken when engaging local waste companies not supported by national agreements. Manual 4 environmental work instruction [ENV 04](#) explains in more detail the process and documentation which must be retained. A dedicated environmental training package ET03 is available on the [UK Sustainability SharePoint](#) to cover waste Duty of Care and EMS requirements.

CEMEX		WASTE MANAGEMENT REGISTER				
Material	EWC Code	Waste Type	Storage Area	Waste Carrier & Carriers licence no.	Transfer Note / Consignment Note	Disposal site details
Waste Tins / Drummed Polymers (excluding dangerous substances)	08 01 11*	Acquainted Waste				
Waste Resins and Adhesives (excluding dangerous substances)	20 01 27*	Acquainted Waste				
Waste concrete and concrete Muffler	10 12 14	Non-hazardous Waste				
Solid Concrete	17 01 01	Non-hazardous Waste				
Cardboard	20 01 01	Non-hazardous Waste				
Brown and Siluminous coated materials	17 01 02	Non-hazardous Waste				



Key Points

- The Environment Agency could visit any site without warning to carry out a compliance audit. Non-conformities could result in enforcement action. All regulatory visits should be recorded.
- Audits could focus on compliance for waste management, storage and documentation but could also include oil storage and other pollution prevention requirements.
- Cemex can be prosecuted for poor waste management of waste at any point along the waste chain if the waste originates at our site.
- We are responsible for ensuring that we have **records to demonstrate** waste is properly transferred to suitably licenced carriers, accompanied with correctly completed waste transfer notes and consignment notes and transferred to a suitably permitted or exempt waste management facility.
- The Cemex EMS requires that **ALL** waste chains are checked and documented in the Waste Management Register SR18.
- Manual 4 work instruction ENV 04 explains in more detail the process and documentation which must be retained.
- A dedicated environmental training package ET03 is available on the UK Sustainability SharePoint to cover waste Duty of Care and EMS requirements.

For further details or information, please contact a member of the Sustainability Department.