



THE INDUSTRIAL PACKAGING ASSOCIATION
www.theIPA.co.uk

**ADVISORY NOTE ON THE ENVIRONMENT AGENCY'S
NEW WM2 TECHNICAL GUIDANCE (3rd edition 2013)**

8th January 2014

The 3rd Edition of the Environment Agency's Technical Guidance Note WM2 is now published and came into effect on 1st January 2014.

Please also refer to the Environment Agency's own letter detailing the changes and requirements – available on the IPA website in the near future at;

<http://www.theipa.co.uk/news-and-codes.php> under “ Reconditioning & Recycling”

Key Changes:

The new guidance removes the previous allowance to consider the weight of the packaging when calculating if Empty, Uncleaned Packaging is to be considered Hazardous Waste. This change means that any packaging that has contained a hazardous product and has been emptied, but not cleaned or decontaminated, must therefore be considered a Hazardous Waste. Such waste must be consigned, carried and treated in accordance with the Hazardous Waste Regulations 2005.

Mineral Oils:

Please note that mineral oils are also classed as Hazardous under these regulations.

Disposal / Recycling:

The Waste (England & Wales) Regulations 2011 introduced the Hierarchy of Waste. To meet these regulations, where packaging can be reconditioned or reused it should be. This is a signed obligation the company undertakes within the consignment process.

If used, empty packaging is uncleaned (ie; contains any hazardous residues) and is assessed as not fit for re-use, then before it can be crushed or bailed for scrap recovery, the packaging should be cleaned. Until cleaned such packaging is controlled under both the Hazardous Waste Regulations and the UN & ADR Dangerous Goods Transport Laws.

Further information:

We hope this information proves useful. The Industrial Packaging Association continues to work closely with various Government Agencies such as DEFRA, the Environment Agency and the Dep't for Transport. Please contact our office or one of our members for further advice on the new WM2 guidance or any other aspects of industrial packaging.

Yours sincerely

Phil Pease C.Env MCIWM.
Chief Executive Officer