

Empty Drums and IBCs – are you WM2 compliant?

April 2014

The 3rd Edition of the Environment Agency's Technical Guidance Note WM2 is now published and came into effect on 1st January 2014. Amendments have been made and these take effect from 1st April 2014.

The latest update to the regulations Waste Management 2 (WM2) identifies empty packaging as being a hazardous waste, if it contains any residue or contamination of a product that is dangerous, including mineral oils (even though they are not classed as hazardous or dangerous under UN/ADR). This includes all types of packaging, for example steel or plastic drums, IBC's etc. The packaging must not be crushed or baled for scrap recovery but must now be consigned and treated in accordance with the hazardous Waste Regulations 2005. If the packaging has been cleaned then it does not fall into this classification.

For more details see the Environment Agency note in the members area.

All sites removing more than 500 kilos of packaging from their site within a 12 month period that has contained hazardous products must be registered as a hazardous waste producer with the Environment Agency and obtain a premises code. The registration is valid for 12 months and will need to be renewed each year. The cost to register online is £18.

To register visit: www.environment-agency.gov.uk

Several collection companies are authorised to collect the packaging waste. Collection is generally a free service for cleaned packaging although there will be a charge for each consignment note issued. A fee is charged if the container is not clean – the company is given the option to clean it themselves or pay for the cleaning to be done. For information on authorised companies [contact the office](#).

WM2 Compliant summary

From 1st January 2014, changes to WM2 are:

- If the container has contained hazardous waste then the residue and container is classed as hazardous waste
- If moving more than 500kg per year then the company is classified as a waste producer
- Waste producers need to register with the Environment Agency to get a premises code – can be done online and costs around £18.
- From 1st April 2014 each packaging collection will have to have a consignment note

The EA won't police these regulations as they don't have the resources, but collection companies will as the EA registration number has to go on the consignment note.

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