

## Consignment notes, waste transfer notes and SIC codes

By Phil Chambers BSc, CMIOSH

Hazardous and non-hazardous consignment notes and waste transfer notes and their SIC codes are confusing. This explains the differences.

Note that, although the waste carrier is the “expert”, the waste producer has the obligation to ensure that the waste carrier has entered the right SIC code.

Hazardous waste must be accompanied by a consignment note, and the regulations are quite specific about this. With regard to non-hazardous waste, the regulations do not specifically state that the waste transfer note must accompany the waste; quite often, waste companies will send the note later.

Type of waste	Documentation	SIC code listing	Examples
Hazardous	Consignment note	2003	2222 Printing general
			2221 Printing of periodicals appearing at least four times a week
			2852 General engineering (manufacture)
Non-hazardous	Waste transfer note	2007	18129 Printing general
			1811 Printing of periodicals appearing at least four times a week
			2562 General engineering (manufacture)

### Background

With non-hazardous waste, the requirement is to use the most up to date versions, ie 2007.

With hazardous waste, (which was already using the 2003 SIC codes) the Government considered that it would be too problematic for businesses to change this requirement at this time and so the requirement is to stick with the 2003 codes. However, the Environment Agency have issued a position statement that says they will not pursue breaches if you use the 2007 code instead.

In 2015 a new coding system (NACE) will be introduced across the European Union. At that time both consignment notes and transfer notes will be required to apply this new coding system

### Applicable regulations

**Hazardous** Hazardous Waste (England and Wales) Regulations 2005.  
Hazardous Waste (England and Wales) Amendment Regulations 2009.  
Amended by Waste (England and Wales) Regulations 2011

**Non-Hazardous** Waste (England and Wales) Regulations 2011  
Waste (England and Wales) Amendment Regulations 2012

Strategic Safety Systems Ltd., 8 The Highgrove, Bishops Cleeve, Cheltenham, GL52 8JA, UK

Phone: 01242 679713 Mobile 077680 11667

E-Mail: [info@StrategicSafety.co.uk](mailto:info@StrategicSafety.co.uk) Web site: [www.StrategicSafety.co.uk](http://www.StrategicSafety.co.uk)

Strategic Safety Systems Ltd., 8 The Highgrove, Bishops Cleeve, Cheltenham, GL52 8JA, UK  
Phone: 01242 679713 Mobile 077680 11667  
E-Mail: [info@StrategicSafety.co.uk](mailto:info@StrategicSafety.co.uk) Web site: [www.StrategicSafety.co.uk](http://www.StrategicSafety.co.uk)