

Code of Best Practice

Pesticide Waste

A BPCA Code of Best Practice (COBP) is a set of written rules which explains how people working in our industry should behave in a particular situation. It encompasses relevant legislation, but is not law in itself. However, were a member to act outside of the norms outlined in the COBP, they may be

subject to disciplinary action and/or be in breach of legislation. Members must abide by all Codes of Best Practice in their day-to-day work. Failure to do so may result in disciplinary action up to and including dismissal from the Association.

Responsibility for waste disposal

Each organisation is responsible for managing their own waste and disposing of it in line with the local legislation (England, Wales, Scotland and Northern Ireland). It is also the organisations responsibility to ensure that they are fully compliant.

We recommend that you speak to your local environment agency for further guidance.

Waste carriers' licence

Holding a waste carriers' licence is a requirement no matter the quantity of waste produce you produce. This may be a lower or higher tier carrier depending on your quantity of waste, types of waste and ownership status of the waste held.

Ensure you apply via the GOV.UK website.
[gov.uk/waste-carrier-or-broker-registration](https://www.gov.uk/waste-carrier-or-broker-registration)

Pest management waste

The definition of "waste" is any substance or object which the holder discards or intends to or is required to discard.

Typical types of waste that a pest management company may produce are:

- Hazardous (not exhaustive) - pesticides (including contaminated PPE or packaging), aerosols and UV tubes
- Non-hazardous (with zero pesticide contamination) - outer packaging, PPE, plastics, cardboards, tools, miscellaneous equipment, paper, overalls, etc
- Rodent carcasses - considered non-hazardous (in waste terms) regardless of the cause of death (rodenticide, trapping, etc).

Waste codes help identify your wastes at point of disposal. These codes must be entered into the relevant notes (see the section on **record keeping**).

See the **BPCA Guidance for Pesticide Waste** for further direction on specific codes.

Duty of care

"Duty of care" is a self-regulating system for the disposal of waste based on good business practice. It places a legal duty on anyone who has any responsibility for controlled waste to ensure that it is managed properly and recovered or disposed of safely.

This duty starts from the point of creation of the waste to the final point of recovery or disposal.

The 'duty of care' places a legal requirement on you to provide an accurate written description of the waste, including any hazards or specific handling requirements associated with it.

Simple waste hierarchy

Prevent creation of the waste

Reuse for another job (if authorised by way of label conditions)

Recycle items such as cardboard (not via any domestic channels)

Disposal should be the final consideration and via a licenced contractor.

It is a legal requirement to consider this hierarchy.

Where possible, pest management companies should make every effort to reuse pesticides and equipment to prevent them becoming waste.

Storage of waste

If you intend to store hazardous and non-hazardous waste such as spent rodenticide and insecticides at your store, even for a short period of time, you must:

1. Always refer to product labels for advice on disposal
2. Ensure that it is stored safely and securely to prevent pollution
3. Ensure that it is packaged and labelled correctly
4. Keep different types of hazardous waste separate
5. Keep hazardous and non-hazardous waste separate

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6. Keep liquid hazardous waste in a dedicated area, with a bund or have a barrier to contain spills and leaks (bunds should be able to hold 110% of the quantity stored)
7. Regularly check storage areas for leaks, deteriorating containers or other potential risks
8. Display written instructions for storing and disposing of each type of hazardous waste
9. Maintain an inventory of the hazardous wastes kept on your premises, and where they are stored (this will help the emergency services to deal with any incident effectively and safely)
10. Ensure CoSHH/MSDS information is available in your store
11. Have a suitable spill kit available
12. Have an available eye wash station.

Record keeping

Movement of hazardous wastes

When transporting hazardous waste from a site (commercial only) there must be a corresponding consignment note tracking the movement of this waste to your storage facility. A copy is NOT needed for your customer. Every quarter you must submit these movements to the environment agency (see **BPCA Guidance for Pesticide Waste**).

Disposal of hazardous wastes

A consignment note must be exchanged between yourself and your waste contractor at point of hand over (both parties must have a copy).

Disposal of non-hazardous waste

A waste transfer note must be exchanged between yourself and your waste contractor at point of hand over (both parties must have a copy)

Retaining waste documentation

It is a legal requirement to keep copies of all waste information notes. Waste transfer notes should be kept for at least two years. Hazardous waste documentation must be retained for three years.

Further reading

Dispose of business or commercial waste
gov.uk/managing-your-waste-an-overview

BPCA Guidance for Pesticide Waste
bpca.org.uk/members-area/technical-support/member-documents (login required).

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