

SPECIAL WASTE CONSIGNMENT NOTES

1. Background

- 1.1 Having regard to our **Principles for Regulatory Approach to EU Exit and COVID-19** of December 2020, we have adopted this temporary regulatory position on the basis that any non-compliance covered by this Temporary Regulatory Position Statement (see below) is unavoidable, solely as a direct result of the impact of COVID-19, and will not lead to significant environmental harm.
- 1.2 We have adopted this temporary regulatory position on special waste consignment notes (SWCN). This temporary regulatory position statement will be published on [SEPA's Regulatory Approach hub](#) on our website.
- 1.3 This Temporary Regulatory Position Statement replaces SEPA's Temporary Regulatory Position Statement on Special Waste Consignment Notes, which applied from 15 December 2020.

2. SEPA position

- 2.1 During the response, it remains important to maintain secure hazardous waste management. This includes the requirement for a form of SWCN to accompany every movement.
- 2.2 Unfortunately, SEPA remains unable to sell pre-coded paper notes due to the reduced use of SEPA offices. This temporary regulatory position provides a number of options for operators to use in the interim.

- 2.3 Subject to the conditions set out in Section 3 of this temporary regulatory position statement, and the adopted regulatory position on pre-notification in the [current general SWCN guidance](#), any failure to comply with the Section 5: consignment note: standard procedure requirements of the Special Waste Regulations 1996 (as amended) will not be treated as a non-compliance for enforcement purposes:
- 2.4 This temporary regulatory position statement only applies to those matters set out in paragraph 2.2 and covered by conditions set out in Section 3. It does not apply to any other regulatory requirements and does not detract from any other statutory requirements applicable to the operator or their operations.
- 2.5 This temporary regulatory position applies from 22 January 2020.

3. Conditions that apply

Specific conditions

- 3.1 All movements of hazardous waste must be accompanied by a form of Special Waste Consignment Note. Regardless of the option used below, you must include a SEPA issued SA/SB/SC code on your note.

Option 1: SEPA Issued SWCNs

- 3.2 If you have a stock of SEPA issued pre-coded paper notes, you can continue to use these normally.

Option 2: Company specific SWCNs

3.3 If you have designed your own SWCNs you can continue to use these normally. Your notes must be accompanied by a unique SEPA issued code.

Option 3: SEPA issued one page SWCN – electronic or paper

3.4 SEPA has produced a [one-page \(PDF\) version of the SWCN and carrier schedule](#) for you to use electronically or on paper. These are branded with a purple 'CVD-19'. You can pass this one-page SWCN and carrier schedule electronically (via email or other means) between parties, or you can print a copy and use it to accompany the waste, passing it between holders at the time of transfer. This note must be accompanied by a unique SEPA issued code.

3.5 Where you pass the one-page SWCN and carrier schedule electronically (via email or other means) the preferred option is to use electronic signatures provided by the parties involved. Where this is not possible the code “**CV19**” should be used in place of missing signatures. In any case, all parties must be clearly identified and contact details provided.

3.6 Printing and using the one-page SWCN on paper means the consignor and carrier will not receive their own signed copy at the time of transfer. All parties must continue to maintain their own records and you must make arrangements so this can happen. For example:

- Consigners and carriers can scan, photocopy or take a photograph of the note at the time of transfer to maintain a complete record. Records should be kept in a central place so they can be made available for inspection.
- The consignee can scan and email a copy of the completed paper note to all other parties in the transfer. The one-page SWCN and carrier schedule capture

email addresses for this purpose.

Option 4: SEPA issued five page SWCN – electronic or paper

- 3.7 SEPA has produced a [five-page \(PDF\) version of the SWCN and carrier schedule](#) for you to use electronically or on paper. You can pass this five-page SWCN and carrier schedule electronically (via email or other means) between parties, or you can print a copy and use it to accompany the waste, giving the relevant paper copy to each holder at the time of transfer. If you use a printed copy, it is best to complete and sign as much of the five-page note as possible before printing. Otherwise, every party will have to complete each of the printed pages during transfer. When completing the five-page versions electronically, the fields auto-populate for text so you only have to fill in the information once. This note must be accompanied by a unique SEPA issued code.
- 3.8 Where you pass the five-page SWCN and carrier schedule electronically (via email or other means), the preferred option is to use electronic signatures provided by the parties involved. Where this is not possible the code “**CV19**” should be used in place of missing signatures. In either case, all parties must be clearly identified and contact details provided.

Purchasing unique SWCN codes

- 3.9 Whether you use your own version of the SWCN, or one of the PDF versions we have provided, each movement must be accompanied by a unique code supplied by SEPA.

- 3.10 To purchase SWCN Codes please call 07388 371621. We will provide an order number and codes via text message.
- 3.11 Payments by BACs is strongly preferred. You can discuss alternative methods of payment with us via the phone number above.

Record keeping

- 3.12 Those involved in the movement are required to retain copies of the SWCN as outlined in the regulations (three years for Carrier/Consignor, site lifetime for Consignee). You may hold these copies electronically, but must be able to provide them if requested.
- 3.13 You must also submit the deposit or completed 'CVD-19' copy to SEPA. Currently however, we are not in a position to receive these. Please do not submit any copies at this time. Please keep these copies, we will request that they are sent to us – including details of where to send them - in an update to this position.

General conditions

- 3.14 This position statement applies only in Scotland.
- 3.15 The terms of this temporary regulatory position statement may be subject to periodical review and may be varied or withdrawn at any time.
- 3.16 SEPA reserves its discretion to depart from this temporary regulatory position statement and to take appropriate action as necessary.