

Transfrontier Shipment of Waste: Inspection and sampling procedures

What's this document about?

This document covers the procedures for inspecting and sampling Waste Electrical and Electronic Equipment (WEEE), Mixed Recyclables and Tyres shipped in suspected breach of the Transfrontier Shipment of Waste Regulations and the European Waste Regulation 1013/2006. The procedure is adaptable to other kinds of waste and applies when encountering the import or transit of those wastes.

The document includes flow charts to assist you when sampling these waste types.

Who does this apply to?

This document should be considered by all officers likely to be involved in the inspection and sampling of containers likely to contain WEEE, mixed recyclables or tyres.

The role of the SIO and make up of the team

The Senior Investigating Officer (SIO) has responsibility for

- arranging appropriate resource and planning the inspections
- the overall investigation.
- arranging a safe and secure site for the procedure
- ensuring the containers are secure
- ensuring health and safety procedures are followed.

The team should generally include suitably trained individuals to undertake roles such as a scribe, tester, exhibits officer, and photographer/video recording.

Officers should familiarise themselves with the legislative controls applicable to the destination country of the items being inspected and sampled.

Where we decide to prevent the export of waste

When a decision is made to prevent an export of waste; **and**

- to carry out an investigation which may involve inspection and sampling of a container; **and**
- presuming we have been able to establish the person(s) responsible for the shipment; **and**
- where it is practical to do so we should:

Step	Action
1	Invite the person(s) responsible to attend our inspection. Record whether they did or not in your pocket notebook (PNB) together with anything they say. If practical, ask the person to sign and date the entry. If they refuse, record this.
2	Explain the sampling procedure to them.
3	Where the person(s) responsible offers to return the container(s) to the site of loading or another site, and this is acceptable to us, we should generally agree to its return, unless the SIO is of the opinion that an alternative option is more practical. In all other circumstances, the SIO shall decide where to send the container for inspection and sampling.
4	Once our inspection is complete and where practical, inform the person(s) responsible of our decision relating to the disposal or recovery of the waste. Include costs of storage, transport, and disposal or recovery of the waste and the responsibility for those costs.

Where the responsible party wishes to sample

We should generally allow them to do this. Inform the person(s) that we will be present (including anyone else we deem appropriate) and that they will be responsible for all costs relating to their own inspection and sampling.

Specific sampling procedures

General

- The attached diagrams indicate a top down approach to inspection and sampling but this is suggested only as it is likely that each inspection may vary. The decision on how to progress the procedure rests with the SIO.
- If provided with intelligence on specific container(s), you may need to completely empty them. It can take a full day to empty one container, as we need to establish what the contents are and whether they are waste.
- Collect and record any items such as data, personal details/information
- When removing contents the best option is to store in another container close by. Where not possible, the SIO should make other arrangements to ensure the safety, protection against weather and integrity of the contents.
- Randomly select items for sampling. Selection and how much will be case specific, needs a reasonable approach and should be proportionate. The SIO should decide and determine the appropriate selection.
- If finding suspected hazardous waste at the front of the container, the decision on whether to unload rests generally with the SIO. If necessary, seek legal advice but this should not prevent on-site assessment and continuation of the inspection. Identify any suspected hazardous waste and determine if it is hazardous.
- Generally, and unless otherwise indicated, use the load point information to confirm what the contents should be. Ask to see the packing list if available (usually from the site load point).

Continues on next page

General,
Continued

- Where multiple containers are involved, if possible get the transporter to declare the contents of all containers are consistent under caution. Any responses or lack of response should be recorded in your note book
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Points to consider

WEEE

Officers involved in the inspection and sampling procedure should familiarise themselves with the EU Revised Correspondents Guidelines No 1. Failure to do so is not critical but seek advice from the SIO or legal where appropriate.

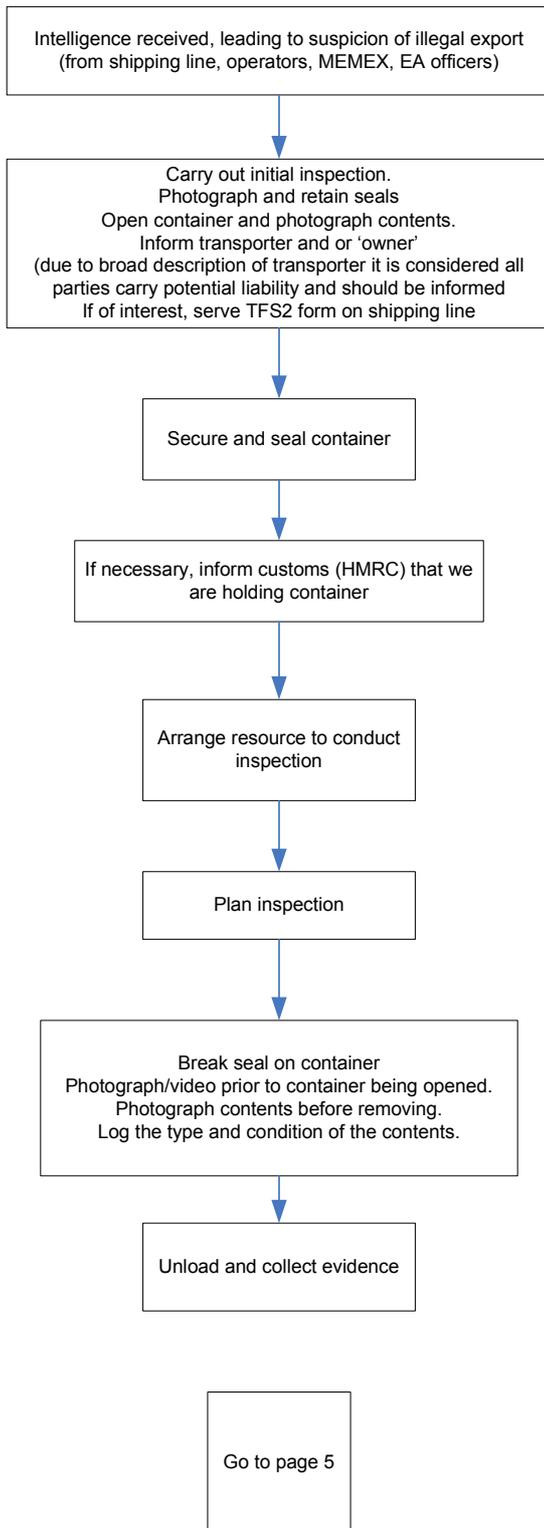
Recyclables

When concerned with recyclables described as green list (such as waste paper) but suspected to have been collected from households we should focus on obtaining evidence of those types of items generally expected to have been collected from households rather than just mixed municipal collections (for example letters, addresses, household items etc). Failure to do so is not critical but advice should be sought from the SIO or legal where appropriate.

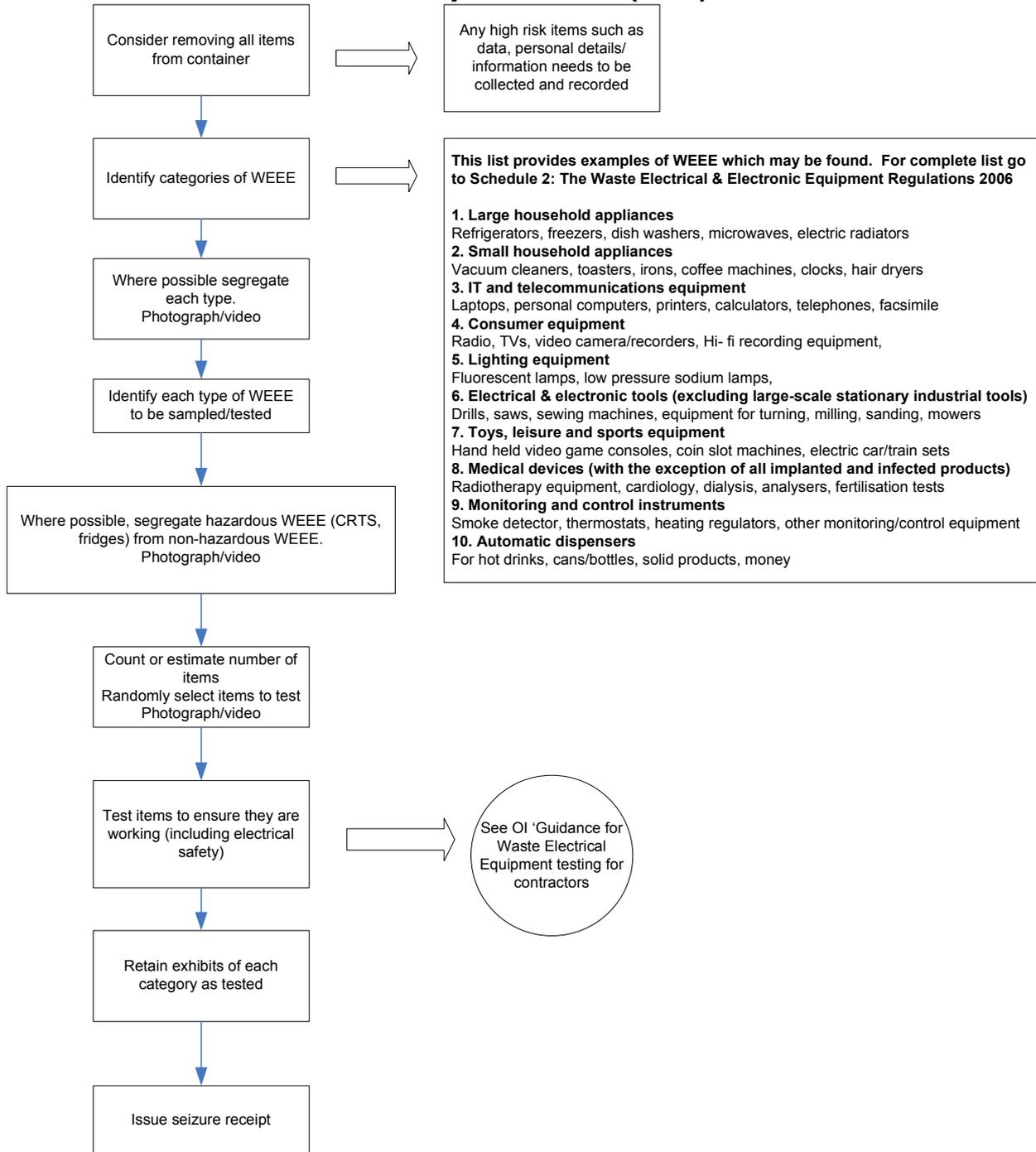
Tyres

- If tyres are baled or compressed, they can no longer be used as tyres and may be waste. Refer to destination country controls on tyres.
 - If appropriate, consider instructing an external expert to provide an opinion on whether the tyres are fit for use for the purpose originally intended.
 - Tyres can be stored loosely in stacks. For containers with or including loose unbaled tyres we may wish to seek advice from VOSA. A suggested option is to consult Regulation 27 of the Road Vehicles (Construction & Use) Regulations 1986 (as amended, 2007). Dimensions and measurements may need to be taken following the relevant parts of Regulation 27.
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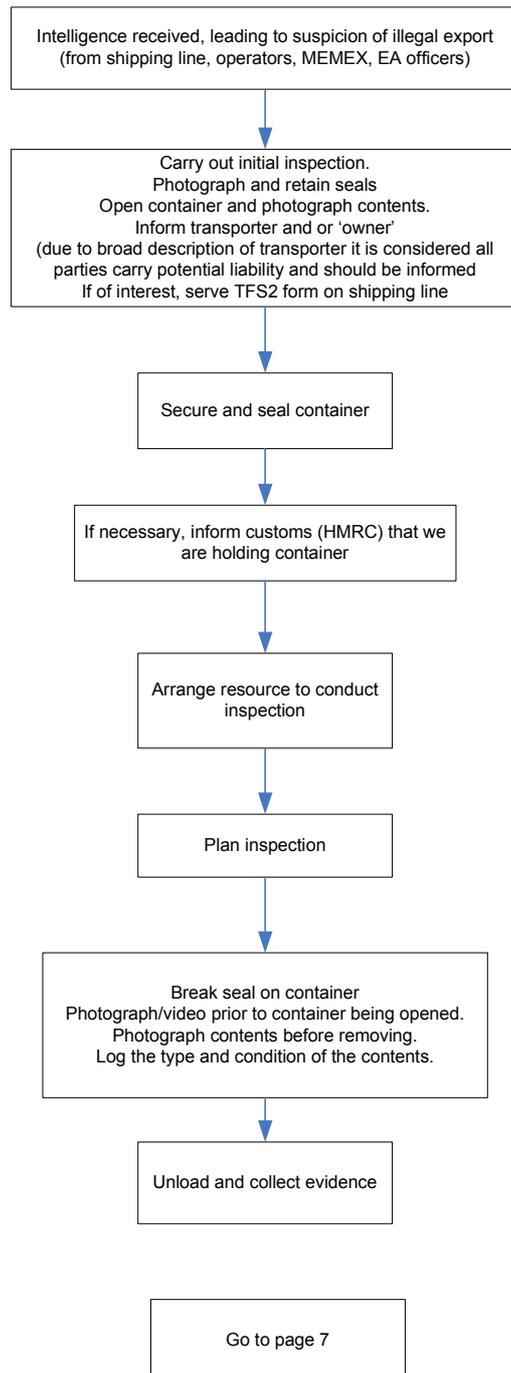
Inspection and Sampling Procedures – WEEE



WEEE procedure (con)



Inspection and Sampling Procedures – Mixed recyclables



Inspection and sampling Mixed recyclables (con)

Consider removing all bales from container.
2 randomly selected bales should generally be removed from each container for splitting and more detailed inspection (unless for environmental, health & safety, or other relevant reason as indicated by SIO
Photograph/video.

For multiple containers, get shipper to declare under caution that contents of containers are consistent

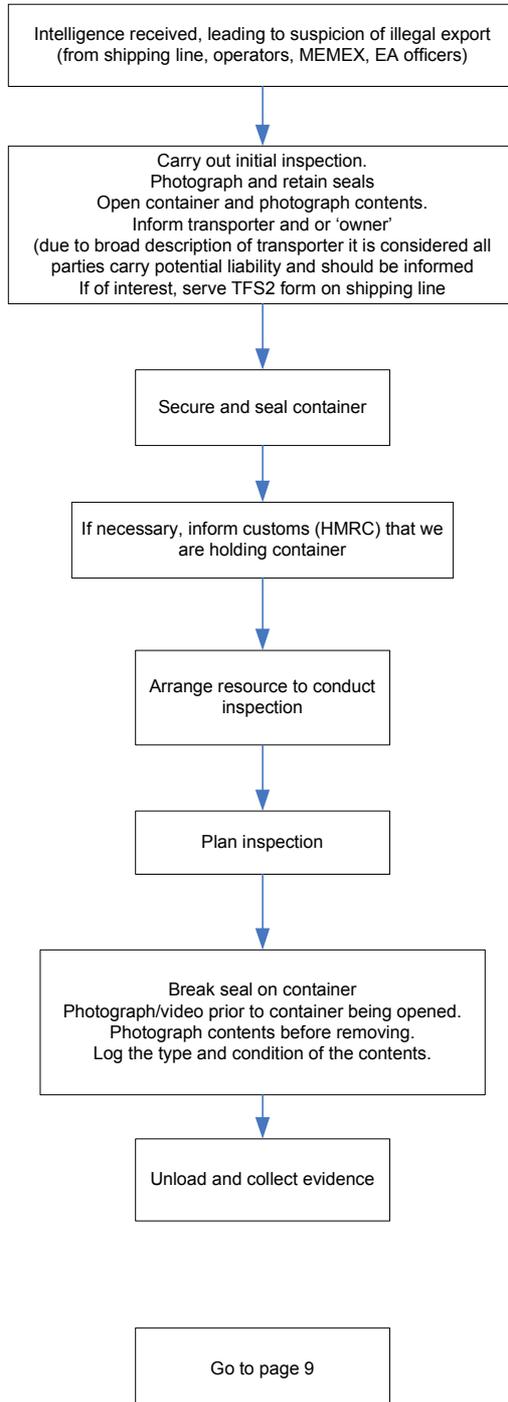
Split each of the bales. Record description including any odour, condensation present.
Are there any identifiable features?

Take a representative sample of each waste type.
Record each type and take photograph(s)
If possible, identify the original source
If anything nasty found in the bale, take more samples.

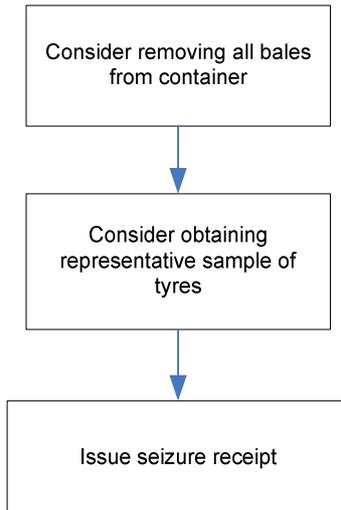
Retain exhibits of each category as tested

Issue seizure receipt

Inspection and Sampling Procedures – Tyres



Tyre inspection and sampling procedure (con)



Electrical equipment testing requirements for contractors

What's this document about?

The Environment Agency has a statutory duty to regulate exports of waste from England and Wales.

When we carry out investigations into shipments of electrical equipment, we will gather evidence of whether the equipment is waste. This may require items of equipment to be tested. Where testing takes place, we must record the results of any tests in a format suitable for use as evidence in enforcement proceedings.

This document sets out the minimum testing requirements and the documentation we must complete for each piece of electrical equipment we test.

Any person who carries out testing in accordance with this procedure may subsequently be required to attend court to give oral evidence.

Who does this apply to?

This document applies to regional framework contractors whose competency has been assessed to perform routine or emergency maintenance of electrical systems or portable appliance testing (PAT) services in any Environment Agency region.

Introduction to waste electrical equipment testing

What is waste electrical equipment?

For the purpose of this document, waste electrical equipment is equipment that has been discarded and it is not fully functional and fit for direct reuse when its intended source of power is applied.

Examples

- Kitchen appliances such as toasters, kettles and mixers.
 - Household appliances such as microwaves, vacuum cleaners, TVs (CRT, LCD and plasma types), radios, hi-fis, DVD players, video recorders, hard drive recorders and Freeview™ boxes.
 - White goods such as fridges, freezers, washing machines and tumble driers.
 - Computers and computer monitors (LCD and CRT types).
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Contractor's responsibilities

For each piece of equipment that requires testing, the contractor must:

- visually inspect the equipment and note any damage seen;
 - PAT test the equipment using an appropriate piece of test equipment (provided it has no damage that makes testing unsafe) and note the results;
 - perform a functional test (provided the equipment has passed its PAT test);
 - complete and sign the observation/test documentation and witness statement the Environment Agency requires.
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Testing

Testing will be on an 'as needs' basis. Usually when we need support the contractor will provide it at a port.

Need for PPE

You must always wear personal protective equipment (PPE) in accordance with the site's rules. We will advise if any special PPE is necessary before the test date.

Ensure adequate time is available for testing

We may require testing on a significant number of pieces of electrical equipment. You must therefore make sure you have adequate time available to fully comply with this procedure for each item presented to you.

Tools and equipment

You will need to have with you:

- PAT tester suitable for testing class 1 and class 2 electrical equipment;
- PAT tested IEC leads with BS1363 fused plugs;
- digital TV, digital aerial (with amplifier), coaxial cable with appropriate connectors, SCART leads, Freeview™ receiver, DVD player;
- PC monitor;
- thermometer with scale -30°C to +10°C for which records of calibration testing are available;
- four-gang extension lead and residual current device (RCD);
- audio CD, DVD, video cassette and audio cassette tapes.

This list is not exhaustive. We will advise you what electrical items you need to test and you **must** bring appropriate equipment and cables to assist in the process.

Risk assessment

When requested to attend a site to perform testing to this procedure, you must take your **generic risk assessment and method statements** for the testing of the electrical equipment with you. The regional MEICA engineer will have reviewed these documents prior to any equipment testing taking place.

Before you undertake any testing, you must complete a **dynamic risk assessment** on site. This must:

- identify any hazards;
 - assess any risks involved in the testing process;
 - indicate the actions you will take to eliminate or reduce the risk in the process to an acceptable level.
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Structure of this document

The document describes:

- the four-step electrical equipment procedure;
 - the observation/test sheets that must be completed for each piece of equipment tested.
-

The procedure

Introduction

For each piece of electrical equipment you are testing, you must:

- visually inspect electrical equipment;
 - PAT test equipment that you have visually inspected;
 - functionally test the equipment, if it has passed its PAT test and you think it's safe to apply mains power to it;
 - complete and sign the observation/test documentation and witness statement the Environment Agency requires.
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Before you start

Before you start the testing procedure:

- prepare your dynamic risk assessment and present it with your generic risk assessment and method statements for review by the Environment Agency officer present on site;
 - ensure that you have a working area that has adequate task lighting and power sockets to enable you to safely test all electrical equipment presented to you;
 - ensure that you have an adequate number of observation/test sheets on which to fully document your findings.
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Four steps

The electrical equipment testing procedure has four steps:

Step	Action
1	Visually inspect the equipment.
2	PAT test the equipment.
3	Functionally test the equipment.
4	Complete the documentation

Visually inspect the equipment

Your visual assessment of the electrical equipment **must** include observations regarding the following. This list may not be comprehensive and other observations may need to be documented.

Step Action

1 Do the following:

- Inspect the cabinet/casement for any signs of damage.
- Inspect TV fascias for scratches, punctures or tears.
- Note if there are any knobs, switches or fixings missing.
- Check all input and output sockets for damage (aerial, SCART, HDMI, USB, etc.).
- Check base and back panels for fractures/corrosion.
- Inspect any other battery compartments for corrosion and/or damage.
- Inspect the mains lead and plug. Check for physical damage that may render it unsafe and check that the correct size fuse is fitted.
- Has the plug and/or mains lead been cut off?
- Does the equipment look as though it is in a condition that means it is safe to apply mains power to?
- Is it wet or dirty?

Is there any labelling indicating that assessments have already been done on the equipment? If so these details must be recorded. For example, this assessment may have considered things such as the type of refrigerant in a fridge or freezer.

2 You must at this stage document all your findings/observations and make a judgement as to whether the equipment is in a safe enough condition to pass to step 2 of the main procedure.

Yes, start [PAT test](#) the equipment.

No, go to [Complete the](#) documentation.

Note: You must plug fridges and freezers (if you have declared them safe) into a power source to allow them adequate time to cool to working temperature.

PAT test the equipment

! Important Don't continue if the electrical equipment does not have mains cable or a BS1363 plug attached.

Always use a PAT tested lead, if the equipment requires an IEC type lead to be connected.

Step Action

1 Carry out PAT testing of the electrical equipment using tests appropriate to whether it is class 1 or class 2.

2 Document all your findings/observations from the PAT test you have performed and make a judgement as to whether the equipment (if it has passed its PAT test), is in a safe enough condition to move to step 3.

Yes, start [Functionally test](#) the equipment.

No, go to [Complete the](#) documentation.

Functionally test the equipment

This test must establish beyond all reasonable doubt that the equipment being tested is fully working and is therefore not waste electrical equipment.

Step Action

1 Plug in the equipment into a mains electricity source and test the equipment is in full use.

2 The electrical equipment testing must establish criteria such as:

- Do PCs power up and display a blinking cursor? Do monitors have a clear full size display?
- Do TVs tune into all nationally available channels, such as BBC1, ITV. Is there a clear picture and audible sound?
- Do radios tune into stations across AM/FM frequencies?
- Do VCRs tune into all nationally available channels? Is there a clear picture/audible sound? Does the VCR record/play/rewind/fast forward?
- Do CD/cassette players record, play, rewind/fast forward? Do DVD players play, rewind/fast forward?
- Do hard drive recorders/Freeview™ units tune into all nationally available channels? Is there a clear picture and audible sound? Can channels be recorded? Will recordings play back?
- Is the temperature inside a fridge below 8°C? Is the temperature inside a freezer lower than -18°C?
- Does IT equipment meet the functionality requirements set out in [Appendix 1](#) of Revised Correspondents Guidelines No. 1 on shipments of waste electrical and electronic equipment (WEEE)?

Note: This list is not exhaustive as there are many types of electrical equipment in everyday use.

3 You must also:

- look for any other control functions that may be required when the equipment is in operation;
check if the equipment does or does not operate.

4 Note any observations regarding operation and any failure of the equipment to operate on the observation/test sheets.

! Important Due to the nature of the equipment being tested it is recommended that the RCD used is a 10mA fast trip.

Complete the documentation

Ensure you have fully completed and signed the observation/test sheets you have produced for each piece of equipment under test.

When the work is over

When you have finished all required testing, give all the sheets you have completed to the Environment Agency officer who has been with you on site. You will be required to provide a witness statement

Related documents

Links

Legislation and official guidance

- [Health and Safety at Work Act 1974](#)
- [The Electricity at Work Regulations 1989](#)
- [The Provision and Use of Equipment at Work Regulations 1989](#)
- [Directive 2002/96/EC on waste electrical and electronic equipment \(WEEE\)](#)
- [Waste Electrical and Electronic Equipment Regulations 2006](#)
- [Waste Electrical and Electronic Equipment \(Amendment\) Regulations 2007](#)
- [Revised Correspondents Guidelines No. 1](#)

British standard

- BS 7671: 2008. Requirements for electrical installations. IEE Wiring Regulations, 17th edition.

SD01 Example statement of evidence

SD02 Observation/test sheet proforma

Transfrontier Shipment of Waste: Inspection and Sampling procedures

Contractors electrical equipment testing assessment form

Name of tester:	Company:
Exhibit reference:	Item description:
Site:	Date of testing:
Visual check	Tester comments
<p>Note the type of electrical equipment, manufacturer, serial number and operating voltage.</p> <p>Detail fully any damage (however minor) to the equipment case, such as controls missing or broken, mains lead/plug damage.</p>	
PAT test	Tester comments
<p>Ensure you test the electrical equipment at its normal operating voltage.</p> <p>Note the result of the PAT test, pass/fail and any other observations.</p>	

Electrical equipment assessment form (continued)

Electrical equipment functional test	Tester comments
<p>Note the full results of your functional equipment testing, detailing the tests you have undertaken and any observations, for example:</p> <ul style="list-style-type: none">▪ equipment powered up to safe, steady state;▪ tuned into channels, sound OK;▪ fridge/freezer working temperature achieved; <p>List here any ancillary equipment used to assist in the functional testing process.</p>	
Other relevant observations and comments	
Date:	Print name:
Signed:	

Statement of: Full name

Age of witness (if over 18 enter "over 18"): Over 18

Occupation of witness: Portable electrical appliance tester or job title required here

This statement, consisting of XX pages each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Signature:

Dated:

I am employed by a company known as **company name** which is based at **company address**. This company specialises in **both** Portable Appliance Testing **and electrical functionality testing?**

Qualifications: I was trained at **college name/date** to Electrical and Electronic City and Guilds Part 1 Practical Level. I also hold a City and Guilds 17th edition Wiring Regulations Certificate along with being a certified PAT tester to the National Association for Professional Inspectors and Testers recognised standard. **Plus any other relevant qualifications.**

Experience: I have spent many years within the electrical industry, with around **X** years being solely dedicated to testing and/or repairing all types of domestic appliances.

As a PAT Tester, on a regular basis, I now test electrical appliances to establish if they are safe to be used for their intended purpose. My work involves advising customers of the dangers associated with using substandard equipment along with providing reports on appliances tested and issuing compliance certificates. **Plus functionality testing.**

On **date xx/xx/xxxx**, at the request of the Environment Agency, I went to **location address**. I was requested by the officer of the Environment Agency that I inspect items identified by him/her as exhibits numbered **XX/XX**. Throughout that day I inspected **XX (number)** electrical items which

included televisions and other smaller items. Of these items, XX (number) failed my tests for various reasons.

During the testing I kept a detailed log of my findings. These logs I have exhibited as Exhibit XX/xx – XX/xx (initials/number as appropriate).

<ENDS>