

1. PURPOSE

To describe the process by which Redox will handle, store, classify, transport, and dispose of any waste materials, which include damaged and unsaleable chemical stock and chemical packaging.

2. SCOPE

This procedure describes the process of disposal for non-liquid & liquid waste and applies to waste generated by all Redox branches.

3. REFERENCES

- a. Standards, Acts, Legislation
 - i. NSW Protection of the Environment Operations (Waste) Regulations 2014.
 - ii. NSW Protection of the Environment Operations Act 1997.
 - iii. NSW Waste Avoidance and Resource Recovery Act 2001.
 - iv. NSW Environmental Guidelines: Assessment, Classification & Management of Liquid and Non-Liquid Wastes.
 - v. VIC Environment Protection (Industrial Waste Resource) Regulations 2009.
 - vi. VIC EPA Information Bulletin - Classification of Wastes (Publ. 448 09/05)
 - vii. WA Environmental Protection (Controlled Waste) Regulations 2004.
 - viii. QLD Environmental Protection (Waste Management) Regulation 2000.
 - ix. SA Environment Protection (General) Regulations 1994.
 - x. NZ Resource Management Act 1991.
 - xi. NZ Local Government Act 1974.
 - xii. NZ Hazardous Substance and New Organism Act 1996.
 - xiii. ACTDG - Australian Code for the Transport of Dangerous Goods by Road & Rail.
 - xiv. NZS 5433:2007 Transport of Dangerous Goods on Land.
 - xv. Transporting Dangerous Goods Safely - An Industry Guide, 2007.
 - xvi. SUSMP - Standard for the Uniform Scheduling of Medicines and Poisons.
 - xvii. US Hazardous Waste Electronic Manifest Establishment Act
 - xviii. US Resource Conservation and Recovery Act (RCRA)
- b. Procedure(s)
 - i. [Sundry Purchase Orders \(1008\)](#)
 - ii. [Establishing & Maintaining Supplier Details \(1633\)](#)
 - iii. [Environmental Policy \(3109\)](#)
 - iv. [Spill Procedure \(3401\)](#)
 - v. [Recycling \(3404\)](#)

4. DEFINITIONS

- a. DG - Dangerous Goods defined within the ACTDG.
- b. HIGA waste - Hazardous, Industrial and Group A waste (NSW).
- c. Poisons - Scheduled Drugs or Poisons defined within the SUSMP.
- d. Waste - any discarded, rejected, unwanted, surplus, or abandoned substance whether or not it is intended for disposal or recycling/reprocessing.

5. PROCEDURE

5.1. RESPONSIBILITIES AND AUTHORITY

The Claims Clerk is responsible for maintaining a permanent record of all waste disposals. If an authorised agent will be engaged by Redox, the Claims Clerk will be the main point of contact for the authorised agent. The Claims Clerk is also responsible for obtaining disposal quotes and receiving all waste tracking documentation.

The Regulatory Affairs Manager/Coordinator is responsible for reporting notifiable incidents causing pollution to environmental authorities where required. The Regulatory Affairs Manager/Coordinator is also responsible for regularly reviewing applicable environmental legislation/regulations relating to waste disposal and management. Should an authorised agent not be able to do so, the Regulatory Affairs Manager/Coordinator should assist in making the appropriate waste classification.

The Regulatory Affairs Manager is responsible for updating/reviewing this procedure as required.

The Store Manager is responsible for ensuring that store personnel adhere to this procedure, that an effort is made to minimise waste as well as the associated hazards, and for ensuring that waste is fit for transport.

The Product Manager is responsible for exhausting all avenues for sale or give away of damaged or unsaleable stock before identifying it as requiring disposal in accordance with Redox's Environmental Policy - 3109.

The Quality Assurance Clerk will establish new waste service providers in the system in accordance with Procedure 1633.

5.2. WASTE CLASSIFICATION AND DISPOSAL METHODS

5.2.1. BURR COURT FOOD PRODUCTION

Three bins must be present in the food production area at Burr Court:

- a. General Waste
- b. Food Waste
- c. Hazardous waste

Each bin must be emptied once a day.

General office and warehouse rubbish including stationery, plastic, glass, food, shrink wrapping, empty chemical packaging (that has not contained DG or Poison) can be disposed in the waste bins on each site.

Non-compactable items such as empty drums, empty IBCs, pallets, large timber pieces, metal, concrete and bricks will be sent directly to landfill, drum reconditioners or waste treatment facilities. The Store Manager is responsible for informing the Claims Clerk when there are empty drums on site that require recycling or disposal.

Paper, cardboard, and aluminium cans may be recycled in accordance with Procedure 3404. In some branches, glass and plastic may be recycled.

Chemicals (including samples) or chemical packaging that has contained DG, Poison or Liquid will be transported and disposed by suppliers who are licensed to accept this waste for treatment by the environmental authority in that jurisdiction. These are never acceptable to be disposed in the waste bins on site or to landfill.

Solid chemicals that are not DG or Poison will be classified on a case-to-case basis by the authorised agent, with the aid of the Regulatory Affairs Manager/Coordinator if required, to determine if they are able to go to landfill. Where landfill is not lawful for the substance, it will be sent to a licensed waste treatment facility. Exemptions may be made at the discretion of the Regulatory Affairs Manager/Coordinator for sample quantities that would be acceptable for landfill in the jurisdiction where the waste bins on site are to be disposed.

5.3. STORAGE OF WASTE PRODUCTS

Spilt/damaged chemical product shall be swept into plastic bags, labelled, and thrown into the spill bins designated for waste for each store in accordance with Procedure 3401.

All chemical products requiring disposal shall be kept in secure packaging within the reject store area or spill bins designated for waste for each store.

Containers of liquid waste such as storage tanks and IBCs must be positioned in bunded areas to prevent falling and leaking. Bunded areas must have impervious walls and floors and capacity appropriate for the type of waste being stored and should have regular observation and maintenance.

In some circumstances, where contracts are in place with customers, Redox may return empty packaging for subsequent disposal. Two such contracts relate to empty Sodium Silicofluoride bulker bags. Arrangements are in place for the return of empty bags from the customers as follows:

- a. Bags are secured and wrapped on pallets to prevent spillage at the customer site.
- b. The bags are transported back to the Redox Minto warehouse.
- c. Bags are then placed in a specialised waste bin on site and when full an approved waste contractor is called to arrange disposal.
- d. The waste bin is locked when not in use to prevent inadvertent use and/or escape of contaminated material or bags.
- e. Details of returns from customers are kept for audit purposes.
- f. Records of disposals will be kept in the Sales Order/Sundry Purchase Order raised for the disposal.

5.4. PROCESS FOR DISPOSING PRODUCTS/REJECT STOCK

Once the Product Manager has requested a disposal quote in the QP diary, Claims Staff will arrange for quotes to be requested (from 3 separate waste disposal providers wherever possible).

As quotes are received, the recipient must upload them into the documents tab of the QP and advise the Product Manager in the QP diary.

If the Product Manager decides to proceed with the disposal, they will advise the CSO which waste disposal provider they would like to proceed with.

Note: If the disposal cost exceeds \$3000, the Product Manager must send a message to the Marketing Manager in the QP diary, advise them of the disposal cost and ask them to approve.

Disposal of the stock will be completed via a Concession Sales Order, which the CSO will arrange, to the waste disposal provider of choice.

The CSO must:

- a. Check the site address of the waste disposal provider to ensure there are no Account Managers attached to it. If there are, another site must be created as a 'House Account' (with no Account Manager attached to it) before a Concession Sales Order can be processed.
- b. Ensure the Division on the site delivery address reflects the Division of the Product Manager. If incorrect, send a message to the customer database maintenance officer to amend to the correct division.
- c. Reference the QP, that is associated with the stock, which is to be disposed, in the 'Problem' box on the Concession Sales Order.
- d. Ensure the price of the goods is zero dollars. Reselect the cost as normal, do not confirm the order.
- e. Send the Road/Rail Freight Officer a message with all the costs associated with the disposal and ask them to create a freight rate that includes all the costs.

Once the Road/Rail Freight Officer has advised that they have updated the costs, the CSO must check all details and confirm the Concession Sales Order.

The CSO may need to create an enquiry for the site. Once the enquiry is created, it must be noted in the enquiry diary that this is for a disposal.

Once the Concession Sales Order has printed (after being processed by Claims Staff – Refer Procedure: 2728), the CSO must advise the Despatch Officer that the Concession Sales Order is for disposal and advise them when the waste disposal provider will collect the goods.

The CSO must reference the Concession Sales Order in the relevant QP and add the costs to the costs tab.

The person who arranged the disposal quotes must arrange a date for the disposal and co-ordinate with waste disposal providers, Store Manager and the Transport Coordinator.

The Store Manager will ensure that chemicals or chemical packaging is fit and ready for transport by the set date. For DG chemicals, transport will be in accordance with the ACTDG or NZS: 5433.

The Transport Coordinator will ensure that the waste is booked onto a run. The Claims Clerk will ensure that the WTC is completed, if required, according to Section 5.5 of this procedure.

5.5. WASTE TRACKING REQUIREMENTS (NOT APPLICABLE TO WA OR NZ).

Any waste containing chemical(s) or chemical packaging(s) classified by the authorised agent or the Regulatory Affairs Manager/Coordinator as one of the following must be tracked from generation, transport through to disposal/destruction (cradle-to-grave). This is usually managed through a Waste Transport Certificate (WTC) or manifest appropriate to the jurisdiction.

AUSTRALIA:

- i. [NSW - HIGA waste \(Hazardous, Industrial or Group A\);](#)
- ii. [VIC - Prescribed;](#)
- iii. [QLD - Regulated;](#)
- iv. [SA – Listed;](#)
- v. [ACT – Controlled;](#)
- vi. [NT – Listed;](#)
- vii. [WA – Controlled;](#)

NEW ZEALAND:

- viii. [New Zealand Waste List \(L-Code or L-list\)](#)

UNITED STATES

- ix. [US EPA: Listed and/or Characteristic Wastes](#)

As a general guide any material that is not suitable for disposal to landfill will require a WTC. Chemicals or chemical packaging that has contained DG, Poison or Liquid will always require a WTC.

For all IBC that are sent to be cleaned and/or disposed, a WTC is to be sent with the IBCs. This will be generated by the person transporting the waste/IBC. IBC that are not to be cleaned before they are refilled are exempt from this requirement.

If Redox is engaging an authorized agent to act on their behalf, then a written agreement between Redox and the authorized agent must take place before undertaking waste transport/disposal. The authorised agent will fulfil the responsibilities of Redox in relation to waste tracking requirements in accordance to the respective state legislation and procedures. This includes, but not limited to: filling the necessary information on the WTC; obtaining the necessary consignment authorisations (CA); engaging with waste receivers and transporters; submitting completed WTC and other requirements to the respective state authority; and providing Redox with completed documentations/records. Redox must provide the necessary information (such as waste classification/codes) to enable the authorized agent to act on Redox' behalf. Redox will also ensure that the authorised agent is appropriately accredited/licenced to perform waste management services in the respective state/jurisdiction.

If Redox will not engage an authorized agent and requires disposal of trackable waste, then Redox must fulfil their responsibilities as a waste producer in relation to tracking the waste. Each state/jurisdiction has instructions on how to comply with the waste tracking requirements, including how to fill and manage WTC until completion:

AUSTRALIA:

- x. [NSW Environment Protection Authority \(EPA\)](#);
- xi. [Environment Protection Authority - Victoria \(VIC\)](#);
- xii. [Queensland Government](#);
- xiii. [Environment Protection Authority – South Australia \(SA\)](#);
- xiv. [Australian Capital Territory \(ACT\) Government](#);
- xv. [Northern Territory \(NT\) Government](#);
- xvi. [Department of Water and Environmental Regulation, Western Australia \(WA\)](#).

NEW ZEALAND:

- xvii. [WasteTRACK: New Zealand Waste Tracking System](#)

UNITED STATES

- xviii. [US EPA: The Hazardous Waste electronic Manifest \(E-Manifest\) System](#)

In most instance, the state authorities has moved the management of WTCs online and will require Redox to set-up an account to the respective waste tracking system. The authorised agent and/or transporter may request Redox to provide the required information online.

After the disposal of waste, the Claims Clerk will ensure that a completed WTC will be kept on Redox' electronic records indefinitely.

5.6. ENSURING A WTC IS COMPLETED BY THE WASTE DISPOSAL COMPANY REPORTING

All waste disposals will be tracked via Sales Order/Sundry Purchase Order using the product code 'CHEDIS1000'.

6. DOCUMENTATION

Nil.

7. PROCEDURE RESPONSIBILITY

Refer Review/Approval Status.

8. SUMMARY OF CHANGES

- 1. 23-Jan-03 Initial Issue.
- 2. 19-Jun-03 Complete Review.
- 3. 01-Jul-03 Amended some minor spelling errors.
- 4. 16-Nov-04 Complete review of AUST & NZ legislation & procedure.
- 5. 26-Jul-07 Added SEO responsibilities & review of NSW Waste Tracking.
- 6. 26-Oct-10 Updated references; corrected subsection numbering in Section 5.1; changed 'Site Environmental Officer' to 'Regulatory Affairs Coordinator' in Sections 5.1.2, 5.1.3 and 5.4.1; removed vehicles RCS791 and SED998; minor spelling corrections.

WASTE MANAGEMENT & DISPOSAL

Site Procedures

REDOX

Printed for training purposes only
May be superseded

7. 14-Dec-11 Changes to Sections 5.4.1, 5.5 and 5.6, removed vehicle TRN718 and minor grammatical changes throughout.
8. 17-Jun-13 References made to 'Transport Coordinator' role removed.
9. 19-Mar-14 Amendments made to sect 5.5.3.
10. 02-Jun-15 Included section on waste disposal at Burr Court and amendments to sections 5.6 and 5.7; amended date format in Section 8.
11. 31-Aug-16 Added Section 5.3.3.
12. 16-Jun-21 Updated References Section 3; Updated Redebiz Procedure Template format; Updated Sections 5.2, 5.4, 5.5; Minor addendums/corrections.
13. 27-Jul-22 Updated Section 5.3 in relation to Liquid Waste storage. Updated Redebiz Procedure Template format.
14. 08-Sep-22 Updated section 4.