

Contingency Plans for Waste Storage

Developing written contingency plans for managing waste during extreme weather conditions

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Why are contingency plans needed?

Many companies regularly recover waste to land for agricultural benefit. However, there are circumstances when access to land for spreading is either restricted, e.g. due to flooding, or prohibited, e.g. [Nitrate Vulnerable Zone \(NVZ\) closed periods](#).

Over the past few years there have been a number of extreme weather events, for example prolonged heavy snowfall, deep frosts and severe drought, which make it unsafe to spread slurry, milk and industrial wastes on land. There will be no agricultural benefit of spreading the waste, soils can be damaged and there is significant risk of pollution through surface run off to watercourses and potentially to groundwater. This has led to difficulties for both producers of waste and waste operators as waste cannot be spread on land for extended periods.

As a producer of waste, your responsibility does not end when the waste is handed over to a waste operator. The duty of care is designed to be an essentially self regulating system which is based on good business practice. It places a duty on anyone who in any way has a responsibility for controlled waste to ensure that it is managed properly and recovered or disposed of lawfully.

Relying on the ability to spread waste to land at all times of the year is not a sustainable management solution. Contingency planning will help both waste producer and waste operator manage the waste in the most environmentally protective way.

Who needs to produce a contingency plan?

If spreading waste to land is the principal route that you use for your waste then you need to consider contingency measures to plan how to manage your waste. The requirement for a contingency plan for operators holding environmental permits is included in our guidance [How to comply with your environmental permit](#) and is intended to ensure impacts on the environment are minimised.

Your contingency plan should identify alternative outlets and recovery options for the waste, and/or additional on-site and off-site storage capacity. Contingency plans will be checked as part of our routine compliance assessments in the future.

What should a contingency plan include?

The following information should be included as a minimum for each waste produced that is normally recovered to land for agricultural benefit.

A contingency plan should identify every option available in the short term (1-2 weeks), medium term (4-6 weeks) and the long term (up to 4 months).

- Description and assign appropriate [List of Waste](#) (EWC) code
- Every option available for managing each waste, including extended storage, other recovery or treatment options and disposal. The next section provides additional information on options appraisal.

- Identify companies / permitted waste facilities that would be able to manage your waste. You should obtain a copy of their permit and ensure the site is permitted to accept your waste type and make note of their capacity constraints.
- The capacity of each option and the length of time it would be available.
- Potential environmental or health & safety risks and hazards of every option (e.g. odour generation or leachate production from longer-term storage).
- Any legal restrictions or constraints for each option
- Any additional costs you may incur from each option

What options are available?

The following options should be considered when developing a contingency plan and have been laid out to take account of the [waste hierarchy](#).

Please note that some wastes may need treatment prior to storage even at the site of production. Additionally, some of these options may not be available for your sector.

You must ensure that appropriate environmental permits are in place

MOST FAVOURED OPTIONS



- Storage at the place waste is produced (in line with existing permit conditions)
- Storage at the place where waste is to be spread (under approved deployment) or other permitted storage facility
- Recovery at another permitted treatment site where waste can be stabilised e.g. Anaerobic Digestion, composting etc (these sites should also have contingency plans)
- Disposal to an identified Sewage Treatment Works (discuss with your water company)
- Incineration
- Landfill

LEAST FAVOURED OPTIONS

When do you need to consider your contingency measures by?

It is strongly recommended that you consider your contingency measures for this winter period, particularly as we may experience further extreme weather conditions over the next few months.

Do you need more information?

If you need to discuss the options available to your business please talk to your local Environment Agency contact or contact our General Enquiries line on 03708 506 506.