
RDF Industry Group

CoP Dashboard Report - 2019

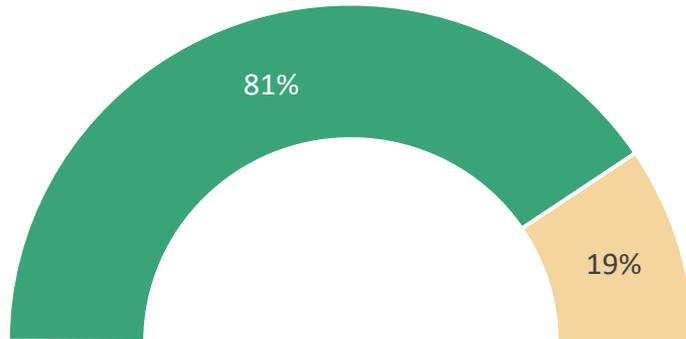
Code of Practice – Dashboard Report

Reporting period: January – December 2019

This dashboard report takes information from members' individual annual Code of Practice (CoP) reports. The dashboard report is an anonymised, high level summary of all reported amber and red breaches, as well as good practice recommendations for avoiding future breaches. The Code of Practice itself can be found [here](#), and further information on the CoP Reporting Procedure used to compile these reports, can be found [here](#).

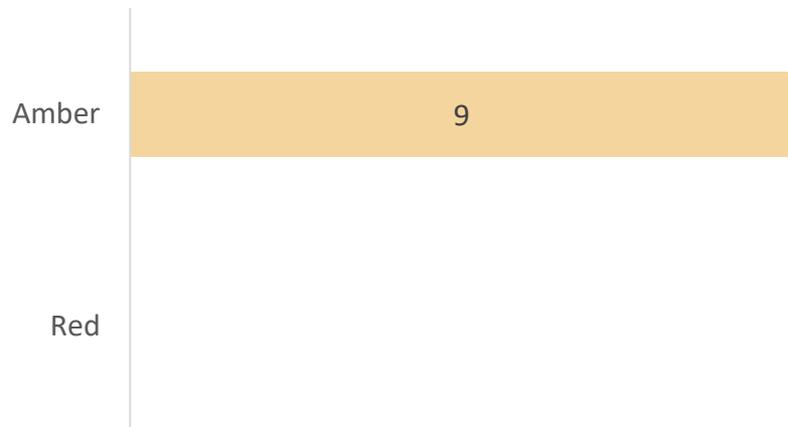
% CoP Signatories by overall compliance level

n = 31*



Key: ■ No breach ■ Amber breach ■ Red breach

Total CoP breaches, by compliance breach level



See Annex 1 for further details of amber and red breaches.

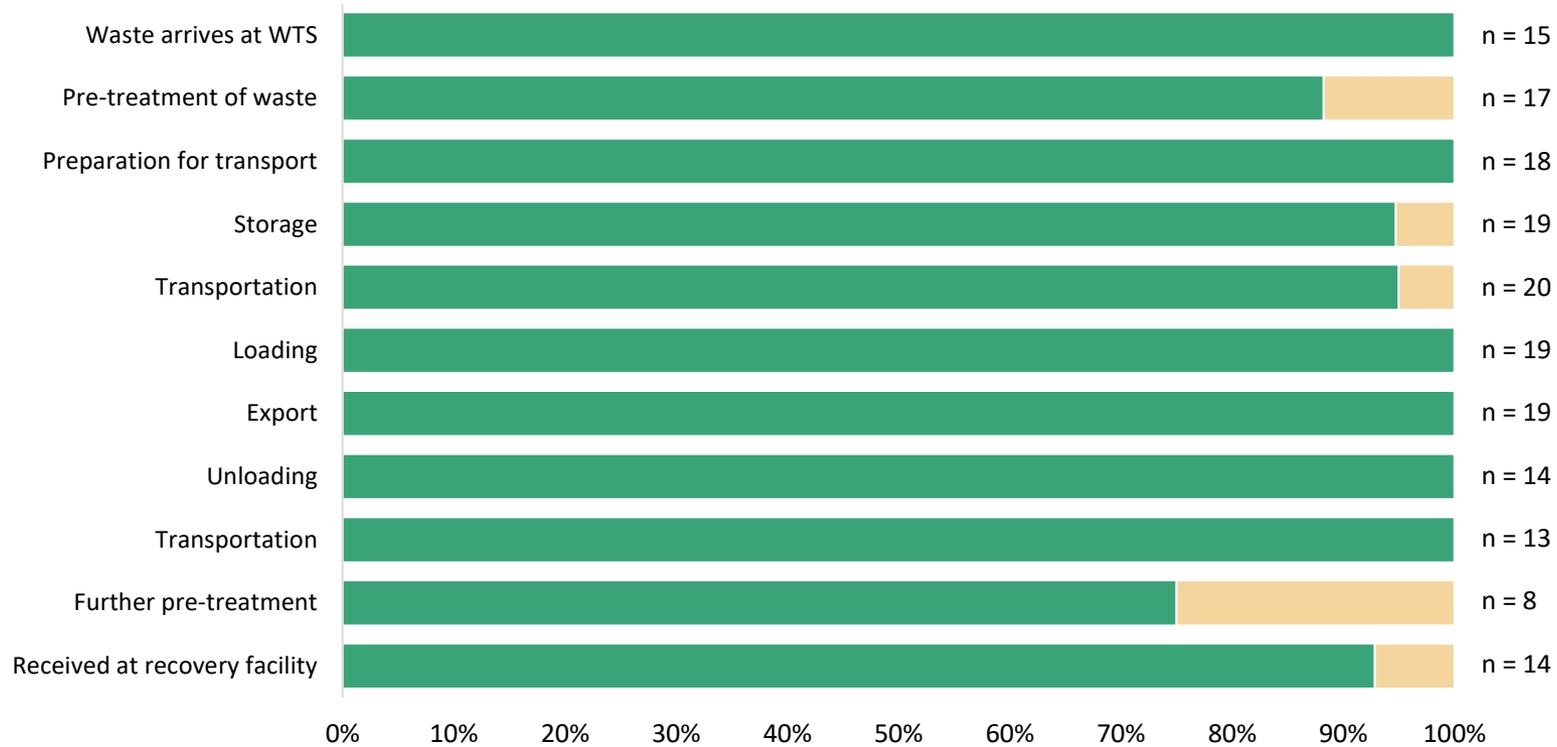
*Three Group members did not renew membership for 2020 and therefore did not submit CoP reports.

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% of CoP Signatories, by compliance level, by CoP stage*



Key: ■ No breach ■ Amber breach ■ Red breach

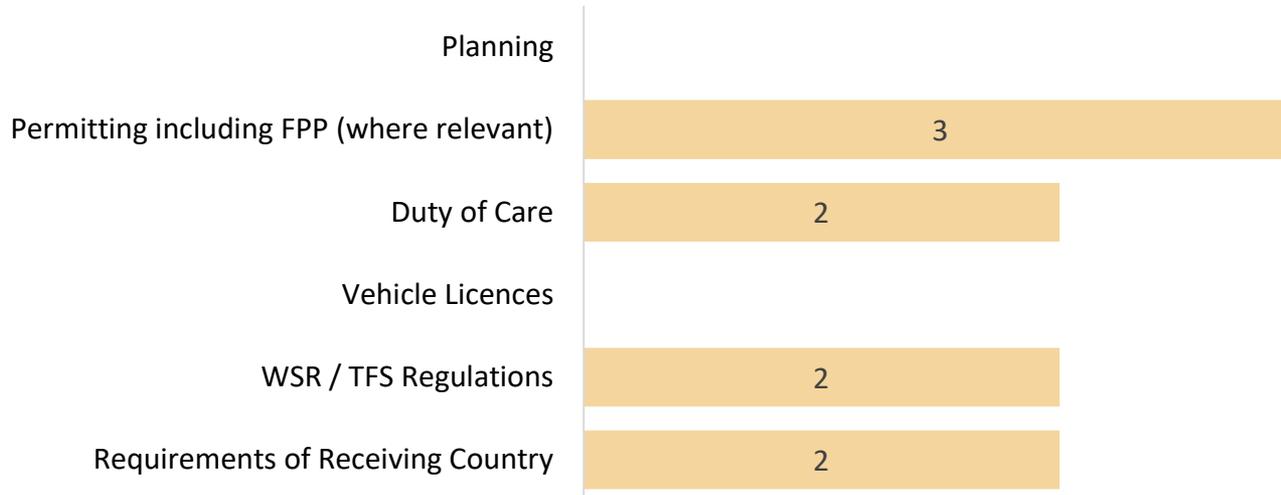
See Annex 1 for further details of amber and red breaches.

*Not all CoP stages apply to all signatories. N = the number of signatories the CoP stage applies to.
This chart shows the % of signatories for each CoP stage, who had at least one amber breach.

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Reporting period: January – December 2019

Number of breaches by area of regulation



Key:  No breach  Amber breach  Red breach

Annex 1 – Breach Level Definitions

Reporting period: January – December 2019

Members are required to report any non-compliance with the regulations detailed in the Code of Practice, for each stage relevant to them. Reporting of non-compliance is done through the reporting of breaches. Breaches are either categorised as 'red' (which is a major breach) or 'amber' (which is a minor breach). Generally, a breach should be coded as follows:

- Red
 - a significant intervention or enforcement action from a regulatory body; or
 - a prosecution or legal action from a third party or regulatory body.
- Amber
 - All other (non-red) breaches to the relevant regulations detailed in the CoP.
- A 'green' status is achieved if a member has been fully compliant with the relevant regulations detailed in the CoP.

Annex 2 – Further Details of Amber Breaches

Reporting period: January – December 2019

Breach	Brief description of the breach	CoP Stage Breach is Relevant to	Area of Regulation Breach is Relevant to	Details of rectification actions taken (or being undertaken)	Good Practice Recommendations
1	Recovery facility required RDF to be removed from container using tipping chassis. Some bales could not be dislodged and consequently the load could only be partially recovered. Remaining waste was repatriated.	Stage 11: Received at recovery facility	WSR / TFS Regulations	<ul style="list-style-type: none"> • Contacted EA for advice. • Documentation to facilitate repatriation was completed. • Load returned to production site. • No further instances of a load not discharging in full. 	
2	Fire in storage shed. Suspected that a wheel loader stored in the shed overnight caught fire, igniting loose material ready for loading.	Stage 10: Requirements of Receiving Country	Requirements of Receiving Country	<ul style="list-style-type: none"> • An improved maintenance schedule for plant machinery has been implemented in the QMS. • All plant machinery to be stored outside of buildings overnight. • Reduce the amount of loose material (opened bales) until required for call off. 	<ul style="list-style-type: none"> • All plant machinery to be stored outside of buildings overnight. • Reduce the amount of loose material (opened bales) until required for call off.
3	Procedure for using radiation detector at production site was not followed. Increased radiation levels detected in container upon arrival at receiving facility. Radiation located to one specific RDF bale.	Stage 2: Pre-treatment of Waste	Duty of Care	<ul style="list-style-type: none"> • Re-induction of personnel involved with RDF production. • Increased security settings on radiation detector with more people included inactivation alert emails. 	<ul style="list-style-type: none"> • Importance of following procedures set up to protect from similar incidents.
4	Waste transfer note issued for a load of RDF had incorrect details on it (e.g. permit number and haulier registration)	Stage 5: Transportation	Duty of Care	<ul style="list-style-type: none"> • Errors were due to an IT error and also human error. • Worked with software providers to rectify the issue. • Compliance review of all carrier information held on the system to ensure no further errors. • Further training undertaken with all relevant staff, covering topics such as weighbridge tickets and the legal obligations relation to waste transfer notes. 	<ul style="list-style-type: none"> • Routine duty of care checks. • Regular tool box talks / refresher training sessions to ensure staff are aware of the importance of the correct completion of waste transfer notes.

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5	TFS paperwork was not placed in the trailer, so was missing when trailer arrived at the port in the receiving country. Load could not be sent to receiving facility until copy paperwork was sent.	Stage 5: Transportation	WSR / TFS Regulations	<ul style="list-style-type: none"> Existing TFS Paperwork Procedure was re-issued to staff (with particular emphasis of key staff members). A simple guide (key bullet points) was produced for display in the weighbridge for ease of reference. 	<ul style="list-style-type: none"> Lengthy procedures are not always read in detail by staff. In addition to tool box talks, it can be useful to condense key points into bullet points and place in direct eyeline of staff.
6	RDF material stored over a prolonged period of time due to technical issues at receiving facility. There were odour complaints from the local community.	Stage 10: Requirements of Receiving Country	Requirements of receiving country	<ul style="list-style-type: none"> Deodorant spray, re-wrapping of torn bales and moving bales in to indoor facility to prevent smell from spreading from the harbour area. Rapid collection and recovery at facility during the autumn of 2019. 	<ul style="list-style-type: none"> Limit the amount of waste stored at one time Store waste indoors to prevent odours
7	Loose RDF stored above designated maximum height of waste pile in the bunker	Stage 4: Storage	Permitting including FPP	<ul style="list-style-type: none"> Waste pile height reduced to designed maximum height. 	<ul style="list-style-type: none"> Regularly remind site operators of site procedures.
8	Small fire caused partly due to poor housekeeping / dust accumulating on mechanical parts susceptible to risk of ignition	Stage 2: Pre-treatment of Waste	Permitting including FPP	<ul style="list-style-type: none"> Ensure housekeeping is maintained around key pieces of equipment to prevent the build-up dust. 	<ul style="list-style-type: none"> Maintain good housekeeping.
9	Fire detected in bio-drying area	Stage 2: Pre-treatment of Waste	Permitting including FPP	<ul style="list-style-type: none"> Fire procedures were implemented correctly 	<ul style="list-style-type: none"> N/A (cause of fire was not determined)



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