



Packaging & Transporting Asbestos Cement Sheets for Disposal

In England and Wales, all asbestos waste containing more than 0.1% asbestos is classified as 'hazardous waste,' while in Scotland, it is classified as 'special waste.'
The corresponding waste legislation is enforced by the Environment Agency, Natural Resources Wales, or the Scottish Environment Protection Agency.

When disposing of waste containing asbestos, it must be done in compliance with the relevant waste Regulations, which include a "duty of care." One requirement of this duty of care is that duty holders must prevent the escape of the waste while it is under their control. Additionally, all movements of asbestos waste must be accompanied by a hazardous/special waste consignment note. The Control of Asbestos Regulations 2012 (CAR 2012) also apply.

ADR (The European Agreement concerning the International Carriage of Dangerous Goods by Road), exempts some asbestos products from compliance with ADR and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG). However, they are still subject to the Hazardous or Special Waste regulations and CAR 2012. The exemption applies to waste that is either bound in cement, plastic, or another binder to prevent the escape of fibres during transportation, or manufactured articles containing asbestos, such as asbestos cement sheets, drainpipes, or vinyl floor tiles.

Packaging of Large Asbestos Cement Sheets

Packaging for large asbestos cement (AC) sheets must include an Asbestos 'a' warning label in accordance with UK REACH (Registration, Evaluation, Authorisation and

Restriction of Chemicals) Annex XVII, Appendix 7. The label is necessary to alert people that the package contains asbestos. For example, large AC sheets can be wrapped in polythene with an asbestos label applied, or a UN asbestos bag can be used, as it already has an Asbestos 'a' warning label on it. AC roof sheets, being manufactured articles, are not subject to the requirements of ADR if they are packed in a way that prevents asbestos fibres from escaping during transportation, even if they are damaged or have the potential to be damaged. There is no specific guidance within ADR regarding the nature of such packaging, so reference should be made to CAR 2012.

According to the Control of Asbestos Regulations 2012:

(1) Employers who work with asbestos must ensure that raw asbestos or waste containing asbestos is not:

- (a) Stored*
- (b) Received into or dispatched from any place of work*
- (c) Distributed within any place of work, except in a totally enclosed distribution system, unless it is in a sealed receptacle or, where more appropriate, sealed wrapping, clearly marked in accordance with paragraphs (2) and (3) indicating that it contains asbestos.*

The Approved Code of Practice (ACoP) accompanying CAR 2012 provides guidance on packaging large items of waste, such as AC:

▶ 529 – Large items of rigid ACM, such as sheets of asbestos cement and textured coatings attached to a board, should not be broken up or cut down for disposal in plastic sacks whenever possible.

▶ 530 – Intact rigid waste should be double-wrapped in suitable polythene sheeting (1000 gauge or equivalent) or other suitable material and labelled accordingly.

▶ 531 – If the asbestos waste is not to be disposed of immediately, the wrapped package should be placed in a suitable and clearly labelled sealed receptacle, such as a lockable skip or freight container.

In summary:

CAR 2012 requires employers to prevent or minimise the exposure and spread of asbestos fibres during handling, transportation, and final disposal. What does this mean specifically for large quantities of intact AC roof sheets?

▶ The sheets must not be broken up for waste disposal purposes.

▶ They must be protected from damage during transport, which could cause further spread of asbestos fibres. This can be achieved by securing and containing them in a metal skip or lorry with metal side panels to provide protection on three sides.

▶ The spread of fragments and dust must be minimised. This can be done by either double wrapping each sheet individually in 1000-gauge polythene or placing them in a suitable bag or a polythene-lined skip or lorry.

▶ The sheets should be taken to a licensed waste facility.

● If they are going to a waste transfer station, the AC sheets must be double wrapped in polythene or another suitable material, as people will be handling them.

● If they are going straight to a landfill, the vehicle used for transport must be suitable for both transportation and tipping at the face of the landfill. Polythene-lined skips and lorries are accepted, but the waste must not be handled by operatives. It should be tipped in accordance with the site rules and procedures.

Note: A flatbed lorry would not be considered suitable as it does not provide physical protection to the secured load at the sides, unlike a skip or tipper truck.

