

***British Beer and Pub Association***

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**Keg & Cask Disposal and Scrapping  
Best Practice**

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**This Circular complements Circular 418, Keg and Cask Supply Chain Best Practice, which defines protocols aimed at reducing container losses. This additional circular provides best practice guidance in relation to the disposal and scrapping of kegs and casks. It replaces version 2 issued in May 2010.**

As the problem of keg and cask losses has grown, it has become apparent that an industry accredited and audited system for disposing of casks and kegs is essential to reduce the risk of misappropriation and enhance the chances of a successful prosecution in the event of illicit handling and disposing of containers.

The objective of the attached best practice is to ensure:

- Containers are only sold or scrapped by the containers' legitimate owner or their appointed representative.
- Containers sold for scrapping are actually scrapped.

Details of accredited scrap processors are be posted on the BBPA website. If you would like to nominate your existing scrap dealer for accreditation, then please contact Stephen Livens at [slivens@beerandpub.com](mailto:slivens@beerandpub.com) However, please firstly ensure that they are fully aware of the requirements set out in this document.

This best practice protocol has been agreed by the BBPA Future Beer Group and endorsed by the BBPA Council and we would like to stress the importance of all members adopting this and only using accredited dealers going forward.

A Tighe  
**Director Brewing**

## **Cask & Keg Disposal & Scrapping Best Practice**

### **1. Introduction**

- 1.1 This paper describes the procedures for the disposal of metal casks and kegs either for scrapping or transfer to another owner.

It is necessary to have control over this process to ensure that the following objectives are met:

- Containers are only sold or scrapped by the containers' legitimate owner or their appointed representative.
- Containers sold for scrapping are actually scrapped.

- 1.2 These objectives are in addition to the environmental requirements necessary to satisfy 'Duty of Care' for the processing of waste; these require the owner to ensure that the waste is disposed of legitimately by persons and organisations appropriately licensed.

- 1.3 These procedures have been produced as a code of practice for use by container owners. If the procedures are followed it significantly reduces the risk for misappropriation and enhances the chances of successful prosecution in the event of unlawful disposal. It covers record keeping, security issues, supplier selection criteria / capability and audit requirements.

- 1.4 Member organisations can request the BBPA/SIBA for the accreditation of a new scrap trader. The Member will be responsible for advising the proposed supplier of the requirement to be accredited, the key requirements of such accreditation and the need for an initial audit. Upon receipt of the request the BBPA/SIBA will engage KegWatch Ltd. to undertake the necessary initial audit and prepare a report. Only when a satisfactory initial audit report has been received will the scrap trader become accredited and able to process containers.

### **2. Process - Scrapping**

- 2.1 Anyone handling containers for the purposes of scrapping containers must be accredited by the BBPA / SIBA. Accreditation will be granted to those fulfilling certain criteria designed to ensure full control over the disposal process.

Accreditation will be granted on a site by site basis with each site having to be accredited in its own right. Accreditation of one site will however require access to be provided, if required, to all other sites in the organisation for audit purposes.

To achieve accreditation the contractor must:

- have the necessary environmental licences to carry out the disposal (including waste transporter's licence if used to carry scrap containers).
- be an established scrap processor (min 5 years).
- have no convictions relating to the unauthorised disposal of scrap.
- have a secure site to minimise unauthorised access. This should include, where appropriate, secure fencing / walls, CCTV coverage, lighting, 24 hour site manning.
- be capable of processing the containers on site - fragmenting / shredding or smelting. (the secondary transportation of unprocessed containers is not permitted).
- have the capability to process all containers within two days of receipt.
- have on site weighbridge facilities.
- have full record keeping facilities which record receipts, hauliers and disposal method.
- allow unannounced audits of all of its sites, whether authorised for disposal or not. Such audits to be carried out by the container owner (or nominated agent) or by the BBPA / SIBA (or nominated agent – KegWatch Ltd).
- have a process at all of its sites for the monitoring and identification of unauthorised receipts of containers, part containers or components. Such processes to include the reporting of any such incidence together with full details to Kegwatch Ltd.
- be able to issue Packaging Recycling Notes (PRNs).

2.2 When containers are to be scrapped the container owner will record the following information:

- Container serial number
- Metal type
- Container size
- Total weight of containers
- Haulier's name & address
- Vehicle registration
- Date
- Destination (disposal site)

2.3 The containers to be scrapped will be weighed prior to departure to the point of scrapping. If the containers are being collected by the accredited dealer, the name of the haulier, the vehicle registration and time of collection must be pre advised and validated at point of collection. Any haulier collecting containers for scrapping must be registered for the carriage of waste and it is the responsibility of the person disposing of the containers to ensure that this licence is in place.

2.4 The containers must be transported directly to the point of destruction in enclosed vehicles e.g. curtain sided trailers (general bulk tippers must not be used).

- 2.5 On arrival at the point of destruction the scrap containers will be reweighed and validated against the original weight. Any discrepancy will be immediately investigated. The time of arrival will also be recorded. These details form part of the audit trail required to be maintained by the accredited dealer.
- 2.6 The accredited dealer will process the scrap containers within two days of receipt at the accredited premises using a process agreed with the disposer of the container (smelting, shredding or fragmenting).
- 2.7 The crushing of containers will only be used where absolutely necessary e.g the breakdown of essential equipment. In such circumstances additional controls will be necessary. KegWatch Ltd. must be advised in advance that crushing is to take place, when it is to take place, the quantity and description of kegs being crushed and the destination of the crushed kegs. Once crushed the kegs must be transferred to another accredited site (as per paragraph 2.1 above) where they can be fragmented or the metal reprocessed within 24hrs. This movement must be treated in the same way as the initial movement to the processor i.e paragraphs 2.2 to 2.5 inclusive must be observed. The only exception to this is the recording of the container serial number (paragraph 2.2).
- 2.8 In circumstances where a significant number of containers are to be scrapped (in excess of 10,000 containers) then, in order to reduce the overall transportation costs, the containers may be baled on the disposer's site using a mobile baler. Anyone wishing to adopt this method of destruction must adopt the following process.:

Advise KegWatch Ltd. in advance of the intention to bale containers on their own site giving details of when and where the containers are to be crushed and baled and how many containers, by size, are to be destroyed.

The baled containers must be transported to an accredited scrap processor within 24 hours of baling for processing.

All of the requirements detailed above in paragraphs 2.2 to 2.6 inclusive for the processing of complete containers must be followed.

There must be no onward transportation of baled containers i.e. they must be fragmented or smelted by the receiving accredited scrap processor on receipt.

NB only containers of the same metal should be baled together.

- 2.9 Once the containers have been destroyed the accredited dealer will sign a certificate of destruction retaining one copy as part of the audit and return a copy to the disposer of the goods.

### **3. Consolidation**

- 3.1 For smaller brewers and those brewers wishing to dispose of a small number of containers it is proposed that KegWatch Ltd. and SIBA will provide a consolidation service. The movement of containers to the consolidation points will be the only movement of containers for scrap that is not directly to the point of destruction.

### **4. Process – Sale of Containers**

- 4.1 When all the containers in an inventory are sold the container Master Database must be updated to reflect the change of ownership. Any issues regarding the update of this database should be referred to the BBPA
- 4.2 When part of the inventory is sold the person disposing of the containers must record the following information and retain a record of the sale:
- Container serial number
  - Metal type
  - Container size
  - Purchaser details
- 4.3 The new owner must also maintain a valid receipt detailing the same information.

The containers should then have the original name obscured and the new owner's identification applied. Serial numbers must remain for cross reference in the event of a dispute.

Where appropriate the container master Database must also be updated.

- 4.4 Under certain circumstances a proportion of a container inventory may be sold and the combined population then managed as a common pool. In these circumstances, where specific containers have not been sold, there is no need to update the marking on the container. The container Master Database must be updated to ensure that the appropriate contacts are detailed to allow effective repatriation.

### **5. Regular auditing and non conformance**

- 5.1 Regular follow up audits will be performed by KegWatch Ltd. Any non conformance discovered during the audit will result in the issue of a 'Non Conformance Notice' and a temporary suspension or withdrawal of accreditation.
- 5.2 KegWatch Ltd will be asked to investigate any report of non conformance with the accreditation requirements detailed above including unauthorised acquisition / disposal. The BBPA may, at its discretion, suspend the accreditation of a scrap trader pending the outcome of any such investigation. All investigations will be carried out promptly. Once the investigation is

completed and all evidence presented the BBPA will confirm the trader's status in writing.

**6. Changes to process requirements**

6.1 If there is a change to the requirements for accreditation a new version of this technical circular will be issued and all scrap traders, accredited at the time of the change, will be advised in writing by the BBPA.

6.2 In the event that the change in requirements results in an accredited scrap trader not being able to meet the new requirements then that trader will be advised by the BBPA in writing that their accreditation will be withdrawn. However, depending on the nature of the new requirements, the trader may be given a period of grace to implement any changes necessary to enable conformance with the new requirements. The length of this grace period will be entirely at the discretion of the BBPA.