



**WAS-G-EASR-04**

**SEPA guidance: storage and treatment of waste motor vehicles**

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This guidance has been updated to meet accessibility standards and to replace certain references to legislation with references to the Environmental Authorisations (Scotland) Regulations 2018.  It has not been reviewed beyond this.  We are aware that sections of this guidance may need to be updated, and this work will be completed in due course.

## Introduction

This document provides guidance for anyone carrying out the storage and treatment of waste motor vehicles under The Environmental Authorisations (Scotland) Regulations 2018 (EASR). It should be read in conjunction with the overarching guidance on Waste Storage and Treatment.

Schedule 15 of EASR sets out minimum standards for the storage and treatment of Waste Motor Vehicles.

“Waste motor vehicle” means a motor vehicle of any type that is waste and includes an end-of-life vehicle. For guidance on when a vehicle becomes waste refer to “When is a Motor Vehicle Waste?”.

The guidance provided in this document is not definitive, and it does not replace the general obligation to manage each operation in the context of its specific location and characteristics. In certain situations, a higher standard of environmental protection may be necessary, for example, where there are local sensitive receptors.

## Additional pre-acceptance procedures for waste motor vehicles

Waste motor vehicles which have not been fully depolluted are hazardous waste. They contain fluids and components that can cause pollution if not removed and handled correctly.

For waste motor vehicles, the following information should be collected from potential customers where possible:

* details of the holder, including name, address and contact details
* a description including type (e.g. combustion, electric or hybrid)
* confirmation of whether it has already been depolluted

Consider whether specific types of waste motor vehicle have properties that pose unacceptable risks to the site or process. For example, damaged batteries can present a risk of fire and explosion.

If the waste motor vehicle has already been depolluted, request evidence to show this has been done. A certificate of destruction (COD), a visual check, declaration or other evidence may help to confirm that depollution has been carried out.

## Additional waste acceptance procedures for waste motor vehicles

Identify gas cylinders and/or other prohibited items in the waste motor vehicle, these should be removed and isolated. Store gas cylinders in locked cages. Where possible, return prohibited items back to the previous holder.

Establish the condition and state of charge of electric vehicle battery packs as soon as possible to identify any damaged batteries.

Quarantine damaged Li-ion batteries (li-ion) and store them away from buildings and other combustible materials. Store damaged batteries in a suitable waterproof container filled with sand or similar inert material.

## Storage of waste motor vehicles which have not been depolluted

Areas used for the offloading, reception, storage and treatment of waste motor vehicles which have not been depolluted, and any oily parts, as well as the quarantine area must have the following infrastructure:

* an impermeable surface
* a sealed drainage system

“Oily parts” means any part containing or covered with any mineral-based or synthetic lubricating or industrial oil.

“Impermeable surface” means a surface or pavement constructed and maintained to a standard that prevents the transmission of liquids beyond the surface or pavement. Impermeable surfaces must have sealed construction joints.

“Sealed drainage system”, in this context, means a drainage system with impermeable components which does not leak, and which will ensure that:

* no liquid will run off the impermeable surface otherwise than via the system; and
* except where they may be lawfully discharged, all liquids entering the system are collected in a sealed sump,

Areas designated for the storage of waste motor vehicles which have not been depolluted and oil contaminated parts must be isolated from other operational areas so that there cannot be any flow of liquids between them.

## Storage of fully depolluted waste motor vehicles

Fully depolluted waste motor vehicles as well as uncontaminated plastic, glass, ferrous and non-ferrous metals arising from waste motor vehicles can be stored on either;

* an impermeable surface or pavement with a sealed drainage system, or
* a hardstanding area

“Hardstanding” means ground that is surfaced with a durable and hard material to create a level, load-bearing and permeable surface that:

* does not accumulate rainwater or water run-off; and,
* is not susceptible to rutting or potholes.

Intact shock absorbers, undeployed airbags and seatbelt pre-tensioners may be kept on, or in, otherwise fully depolluted waste motor vehicles on hardstanding if they are likely to be removed for use as second hand parts. These components must be removed before the vehicle is sent for shredding.

## Storage of batteries

Before assigning batteries (produced through depollution activities or accepted as discrete loads) to a storage area, check for damage and the chemistry type.

Isolate damaged batteries from other batteries.

Batteries should already be labelled to identify the battery chemistry. If there is no label present, get advice from the manufacturer or databases such as IDIS.

Batteries of different types and chemistries must be stored separately in appropriate containers that are either:

* weatherproof, for example in containers have lids that prevent water ingress; or
* stored in a ventilated building, but in a way that prevents them from being exposed to high temperatures.

Store batteries in a way that prevents them from being damaged. Do not use damaged containers to store batteries.

Store lead acid batteries upright in leak proof acid resistant containers.

## Storage of oil and other fluids

Oils, fluids, and other components removed as part of the depollution process should be stored in separate containers, in a manner that prevents contamination.

Fluids of different types should be stored in separate containers in a bunded area awaiting specialist recovery or disposal.

Have separate containers for:

* fuels (petrol and diesel separate)
* oils, e,g, lubricating, transmission, power steering and shock absorber oils (together)
* hydraulic fluids, e.g. brake and clutch fluids (together)
* water based coolant and screen wash (together)
* diesel exhaust fluid (DEF), e.g. AdBlue

**Above Ground Tanks and ‘Bulk’ Storage**

Locate above ground tanks on an impermeable surface with secondary containment. Bunds should meet [CIRIA 736](https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS) or an equivalent approved standard.

Secondary containment (bunds) must:

* be impermeable, stable and resistant to the stored materials
* the greater of 110% of the capacity of the largest container the bund is protecting or, in cases of two or more containers, 25% of the combined volume of all the tanks the bund is protecting
* have pipework routed within bunded areas with no penetration of contained surfaces
* be designed to catch leaks from tanks or fittings
* have regular visual inspections – any contents must be pumped out or otherwise removed under manual control after checking for contamination
* be fitted with a high-level alarm (where appropriate) if not frequently inspected
* have tanker connection points within the bund (where possible), and if not possible provide adequate containment for spillages or leakage
* have programmed engineering inspections (extending to water testing if structural integrity is in doubt)
* be emptied of rainwater regularly to maintain the containment capacity

It should be possible to close all connections to vessels, tanks and secondary containment using suitable valves. Fit a valve close to the tank where there are bottom outlets and have at least two isolation points in case of valve failure.

Direct overflow pipes to a contained drainage system (for example the relevant secondary containment) or to another vessel where suitable control measures are in place.

### Containers, IBCs and drums

Provide secondary containment for all drums and other containers which:

* are greater than 200 litres in capacity and are kept outside, and
* contain liquids (waste or otherwise) that could be harmful to the environment if spilled

Containers should be fit for purpose, that is:

* in sound condition
* undamaged not corroded, if metal
* have well-fitting lids
* suitable for the contents
* with caps, valves and bungs in place and secure within the manufacturers use-by date, particularly for plastic containers

Containers should remain labelled during storage in the way it was labelled at acceptance. Handle and store containers so that the label is readily visible and continues to be legible.

Store all containers in a way that allows easy inspection. Check any containers (and pallets they may be stored on) regularly. Non-compliant containers and pallets should be made safe. Immediately manage any unsound, poorly labelled or unlabelled containers (for example, by re-labelling, over-drumming and transferring the container’s contents).

Do not use containers, tanks and vessels beyond their specified design life. Only use them for the purpose, or substances, they were designed for.

## Depollution of waste motor vehicles

All waste motor vehicles should be depolluted as soon as reasonably practicable. The depollution sequence can be separated into four stages:

* preliminary activities
* removal of batteries
* removal of fluids and other items
* removal or deployment of air bags and seatbelt pre-tensioners

After each depollution operation, transfer the fluid or other items removed to a suitable storage facility as soon as possible.

## Preliminary activities

Before depollution, check the vehicle for and remove any objects that might affect the way in which its treatment should be handled, such as gas cylinders and aerosols.

Use the specific vehicle manufacturer’s guidance on depollution. If this is not available, then depollution information may be available on systems such as the international dismantling information system (IDIS) which can be found on the [IDIS website](https://www.idis2.com/). Other sources of information may be available.

Remove the fuel, oil filler and other caps or open them to allow fluids to drain more easily.

Set heater controls to maximum heat to make sure the coolant in the heater unit can be drained.

Removing wheels or tyres is not a depollution requirement. However, removing the wheels and tyres will improve access to brakes and shock absorbers for depollution.

Remove balance weights from all wheels including the spare wheel, and place in a suitable storage container for recycling.

Place the waste motor vehicle on a support frame or lifting device to allow easy access below the vehicle.

## Removal of batteries

Remove or disconnect all batteries with the terminals isolated, as soon as is practicable after the waste motor vehicle arrives and before the waste motor vehicle is stockpiled. This is to reduce the risk of fire and electric shock. If batteries are stored correctly in an upright position, it may not be necessary to isolate the terminals.

Modern vehicles may have several smaller lithium-ion (Li-ion) batteries, for example in the infotainment and tracking systems. If not removed, these batteries can become damaged and pose a fire risk. IDIS provides information of the number and types of batteries in a particular make and model of waste motor vehicle and where they are located.

Comply with the safety warnings listed in the manufacturer’s instructions, in IDIS, or in other competent data sources.

### Electric and hybrid vehicles

If the vehicle is electric powered or a hybrid vehicle, it is important to refer to the manufacturer’s instructions when removing the battery.

Li-ion batteries are found in electric and hybrid vehicles. They have several cells within the battery and be over 500 volts. High voltage Li-ion batteries can be located in various places within the car, for example in the floor or in the boot areas. Different systems discharge in different ways, so understand how to safely deactivate, discharge and remove the battery packs. There is information on the [Society of Motor Manufacturers and Traders (SMMT)](https://www.smmt.co.uk/industry-topics/environment/battery-recycling/) website.

The Li-ion battery packs in electric vehicles are becoming increasingly large and heavy. Whatever method used to remove and move this battery; avoid damaging it. The battery can be damaged by incorrect handling, for example moving the vehicle with a forklift truck. Use specialised equipment such as supporting stands and tables to safely remove and transport them around the site.

Further detail about the [risks and hazards of working with electric and hybrid vehicles](https://www.hse.gov.uk/mvr/topics/electric-hybrid.htm) can be found on the HSE website.

## Removal of oil and other fluids

Take care to avoid any vapour build up in floor mounted drip trays. The Dangerous Substances and Explosive Atmospheres Regulations ([DSEAR)](https://www.hse.gov.uk/fireandexplosion/dsear.htm) provides advice on avoiding explosive atmospheres.

Carry out depollution activities using equipment which has been specifically designed for each given depollution operation. Using such equipment will help achieve a high level of depollution in a relatively short time frame.

After depolluting a component, plug any gravity-drained holes to prevent any residual leakage. Do this with the original sump/drain plug or a suitable plastic bung.

### Engine oil

Engine oil is gravity drained by removing the drain plug at the bottom of the sump and collecting the oil. Engine oil can also be removed by suction through the dipstick tube. The container should have a minimum volume of 10 litres. Allow the oil to drain from the engine for a minimum of 20 minutes, or until oil is no longer draining.

Remove the oil filter. Do this by using a suitable spanner or tool which does not puncture the oil filter during removal. Treat the oil filter to remove residual oil. Alternatively, send the oil filters to a suitable treatment facility using leakproof transit packaging.

### Gearboxes

If a manual gearbox has a drain plug, gravity-drain it by removing the drain plug and collecting the oil in a suitable container. Allow the oil to drain for a minimum of 10 minutes until there is no longer any oil draining.

Drain gearboxes which do not have a drain plug by drilling or piercing a suitably sized hole in the bottom of the gearbox and collecting the oil. Alternatively appropriate suction equipment may be used.

Drain automatic gearbox oil from both the gearbox and the torque converter. These may be combined in a single unit, but the torque converter on some types of gearboxes is separate from the main gearbox unit. The procedure for draining these is the same as for a manual gearbox.

### Rear differential

The procedure for draining a rear differential is the same as for a manual gearbox.

* drill those that do not have a drain plug
* loosen and prise open the differential flange (if rear wheeled drive)
* use suction equipment

### Power steering

If the waste motor vehicle has power steering, extract fluid from both the reservoir and the connecting hose. Remove fluid by piercing the hose and using a suction device to suck out the fluid, or by cutting it at the lowest point and allowing the fluid to gravity drain. Working the steering wheel lock will help expel fluid from the steering rack.

### Brake fluid

Most waste motor vehicles contain brake fluid. Remove brake fluid with commercial equipment using both pressure and suction on the reservoir, pipes, and cylinder.

Allow a drainage time of 10 minutes. There should be no visible fluid left in the reservoir and no visible further drainage following removal of suction equipment.

### Clutch fluid

If the waste motor vehicle has a hydraulic clutch rather than a cable clutch then use equipment similar to that used to extract brake fluid from the brake reservoir to extract fluid from the clutch reservoir and slave cylinder.

### Coolant (antifreeze)

Drain coolant and collect the liquid in a suitable container with a minimum volume of 10 litres. Commercial equipment can drain from any reservoir into a container. Allow a drainage time of 10 minutes, until there is no longer any coolant draining.

### Screen washing fluid

Remove screen washing fluid by sucking it from the reservoir, or by draining it from below. Either use commercially available equipment or other suitable suction equipment.

If using suction equipment, inspect the reservoir to check that it has been completely emptied. If a vehicle has more than one reservoir, drain all reservoirs. Allow to drain until there is no longer any fluid in the reservoir.

### Fuel tank (not LPG)

The Health and Safety Executive (HSE) has provided guidance for operators on the [safe recovery of petrol from end of life vehicles](https://www.hse.gov.uk/waste/saferecovery.htm) aimed at reducing the risk of petrol fire and explosion.

Fuel can be removed by suction or siphoning it from the tank with a tube that enters the tank through the fuel filling pipe. However, this procedure is unlikely to achieve the required level of depollution and should only be used where no other method is available.

To ensure the required level of depollution pierce or drill a hole into the lowest point of the fuel tank and use suction to remove the fuel.

Drills or piercing tools should be made of suitable non-sparking material and pneumatically powered. There must be an earthing connection between the vehicle and the extraction equipment. Commercially available equipment should meet these requirements. All equipment must be [ATEX Directive compliant](http://www.hse.gov.uk/fireandexplosion/atex.htm#whatatex).

Drain the fuel tank until there is no longer any fluid in the (see through) extraction tubing.

### Suspension system – shock absorbers

Remove the fluid from both the inner and outer cylinders of the shock absorber.

The equipment designed for fluid or oil-based shock absorbers may be suitable for safely removing the gas from gas suspension systems. Confirm this with the manufacturer of the equipment. Follow any additional safety requirements or other instructions provided by the manufacturer.

Carry out these procedures until there is no longer any fluid.

### Sealed suspension systems

There is commercially available equipment for both removing and recharging these sealed suspension systems. Alternatively, they can be gravity-drained in about 20 to 25 minutes.

Carry out these procedures until there is no longer any fluid.

### Air conditioning refrigerant

There are 3 types of refrigerant found in vehicle air conditioning systems:

* R12
* R134a
* HFO-1234yf (2,3,3,3-Tetrafluoropropene)

Although the same specialist equipment can be used to extract R12, R134a and HFO-1234yf, they must not be mixed. Separate containers should be used. Systems using HFO-1234yf need different connectors to those used for R12 and R134a so operators should have both sets. Depollution takes around 10 to 12 minutes (depending on the system and ambient air temperature).

### AdBlue

AdBlue is a liquid containing urea which is widely used in catalytic reduction systems. AdBlue is injected into the vehicle exhaust gases to aid the breakdown of NOx emissions into nitrogen and water.

AdBlue is extremely polluting if it enters surface water or groundwater. AdBlue is soluble in water, so oil separators do not contain or remove it.

Store AdBlue in containers with valves and pipework specifically designed to store urea. This is because it contains ammonia which is corrosive to some metals, such as copper and its alloys.

### LPG (liquid petroleum gas) tank

If feasible, run the engine to empty as much fuel as possible from the tank before removing it. This will reduce the weight of the tank and the risk of vapour loss.

Even after running to empty the tank will still contain some residual gas vapour, so follow the full removal procedure. Check the battery has been removed or isolated before removing the tank.

The basic depollution procedure is as follows:

* turn off the isolating valve
* cut through or disconnect the connecting pipes
* cut through or remove the retaining clamps or straps
* remove the tank to safe storage
* refer to the guidance on the [removal of LPG tanks](https://www.gov.uk/government/publications/removal-of-lpg-tanks-guidance).

Quarantine the vehicle in an open area so the tank can be isolated and removed for emptying, purging and separate disposal by suitably qualified personnel. Check the vehicle for gas leaks using proprietary detection equipment.

Store removed tanks in the open air in appropriate racks or cages until qualified disposal agents can collect or treat them.

Because there are health and safety issues when removing, handling and storing LPG tanks, authorised treatment facilities (ATFs) should check HSE’s current guidance.

### Parts containing mercury

Perform a visual inspection of areas which contain this type of part (usually switches) during the depollution procedure, but only those parts clearly marked as containing mercury need to be removed.

### Asbestos

Some older waste motor vehicles may contain asbestos (for example, certain brake pad linings).

Do a visual inspection of the vehicle during the depollution procedure to identify any labels indicating that certain parts contain asbestos. If a visual inspection identifies components that contain asbestos, these must be removed and stored separately.

## Removal or deployment of pyrotechnic devices

Remove or deploy all pyrotechnic devices such as airbags or pyrotechnic seat belt pre-tensioners. This is because they are classed as explosive components and can cause severe injuries.

Pyrotechnic devices are deployed either mechanically or electrically depending on vehicle type and year. Assess every vehicle for airbag type and quantity, and any other pyrotechnic devices that may be present.

Get advice from the manufacturer if information is not provided in IDIS. Be aware of:

* different types of airbags and other pyrotechnic devices contained in a vehicle
* method of deployment – mechanical or electrical
* health and safety issues regarding deployment, removal and disposal

Only appropriately trained personnel should carry out airbag deployment or removal.

### Airbags

Before working on electrically deployed airbags, disable them by disconnecting the battery. After disconnecting the battery, allow a minimum period of 30 minutes before carrying out any work on the airbags. This is to allow any residual charge left in the system to dissipate.

Some vehicles have a supplementary battery back-up system. This will normally be indicated by a flashing LED on the steering wheel which shows that the airbag circuit is still active. Check IDIS for details of the battery location and how to disconnect it.

Many modern cars may have more than 10 air bags. Removing all the airbags would be a time-consuming process. The safest and most efficient way to do this is to deploy the airbags within the vehicle. If it is not possible to deploy the airbag within the vehicle, remove the airbag and deploy it immediately.

Assess the level of noise produced during the deployment of air bags particularly if the treatment facility is close to a residential area. Gases and particulates are generated during deployment of pyrotechnic devices. Once all devices have been deployed, open all doors to thoroughly ventilate the vehicle before re-entering it for any removal operations.

Once deployed, pyrotechnic devices are neutralised and can be left inside the vehicle. The explosives used in airbags (before deployment) are toxic and are hazardous to health. As they are sealed into the generator in manufacture, exposure to these chemicals during normal handling is highly unlikely. The HSE have guidance on the [safe handling and storage of airbags](http://www.hse.gov.uk/pubns/indg280.htm).

### Seatbelt pre-tensioners

Waste motor vehicles that contain airbags may also contain seatbelt pre-tensioners. These are designed to pull the seat belt tight at the same time as the airbags are deployed, to clamp the seat belt wearer to the seat preventing them from gaining too much acceleration or twisting before they hit the airbag.

Pre-tensioners may contain explosives or have stored mechanical energy (a large spring) that is deployed mechanically or electrically. Refer to guidance from the manufacturer on how to identify, remove and deploy seat belt pre-tensioners if this is not in IDIS.

## Treatment to promote reuse, recovery and recycling

To maximise the potential of reuse, remanufacturing and refurbishment of parts and components, and preserve a high value for the secondary materials which derive from waste motor vehicle, the following parts and components should be removed carefully prior to shredding.

### Catalytic converters

Older waste motor vehicles may not possess a catalytic convertor, but nearly all modern vehicles, both petrol and diesel, will have a catalytic conversion unit in the exhaust system.

Identify the catalyst by a visual inspection of the exhaust system.

Remove the catalyst unit by cutting through the exhaust pipe, both in front of, and behind, the catalyst unit. Some vehicles may have more than one catalyst unit.

Catalytic converters must be stored in a manner that prevents the metal casing being damaged or pierced.

### Metal components

Removal of all metal components containing copper, aluminium and magnesium.

### Tyres

Tyres shall be segregated and stored on an impermeable surface or hardstanding.

### Large plastic components

All large plastic components including bumpers, the dashboard, any fluid container should be removed in a way that they can be recycled as materials.

### Glass

Windshields, rear and side windows made of glass

# Treatment Outputs

Typical waste codes used in the WMV sector are described in this table.

| **List of Waste codes** | **Description** |
| --- | --- |
| 13 01 11\* or 13 01 12\* or 13 01 13\* | Hydraulic oils |
| 13 02 06\* or 13 02 07\* or 13 02 08\* | Engine, gear, and lubricating oils |
| 13 05 03\* | Interceptor sludges |
| 13 05 07\* | Oily water from interceptor |
| 13 05 01\* | Solid waste from interceptor |
| 13 07 01\* | Fuel oil and diesel |
| 13 07 02\* | Petrol |
| 13 07 03\* | Other fuels, including mixed fuels from mis-fuelling |
| 14 06 01\* | Air conditioning gas (R12 or R134a) |
| 14 06 02\* | Air conditioning gas (HFO-1234yf) |
| 16 01 04\* | End-of-life vehicles – undepolluted |
| 16 01 07\* | Oil filters |
| 16 01 06 | End-of-life vehicles, containing neither liquids nor other hazardous components |
| 16 01 08\* | Mercury containing components (tilt switches) |
| 16 01 11\* | Brake pads containing asbestos (older Waste motor vehicles) |
| 16 01 13\* | Brake fluids |
| 16 01 14\* | Antifreeze containing hazardous substances |
| 16 01 21\* | Catalytic converter/ DPF units containing (RCF) |
| 16 06 01\* | Lead acid batteries |
| 16 06 02\* | Ni-Cd batteries |
| 16 01 03 | Tyres (no longer usable) |
| 16 01 10\* | Explosive components (for example, airbags) |

(\*) An asterisk at the end of a code means the waste is hazardous.

## Disclaimer

This guidance is based on the law as it stood when the guidance was published.

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