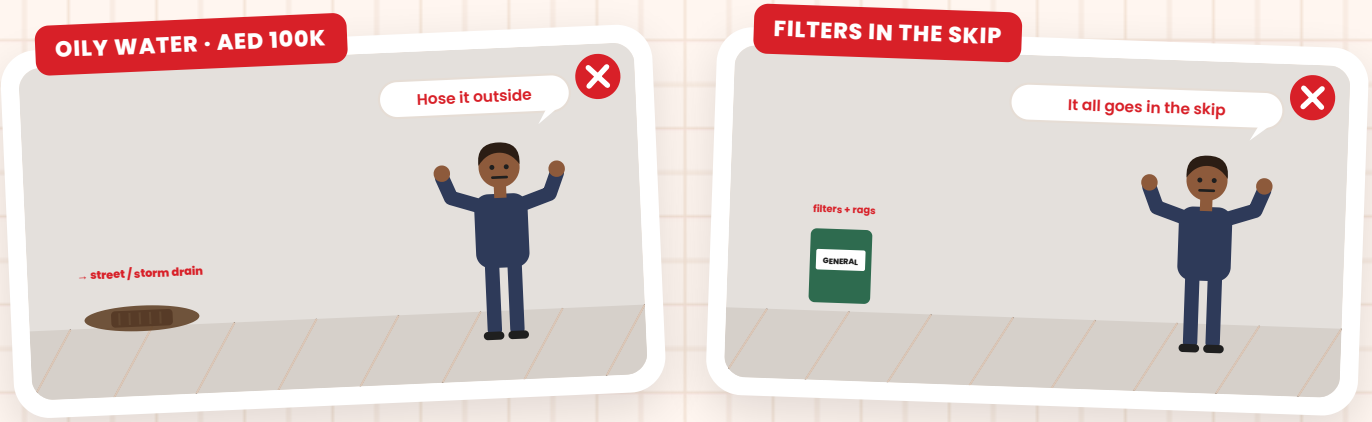
• UP TO AED 1,000,000 Workshop, body shop, wash bay, tyre bay & yard

# Environment & Waste Compliance Guidebook for Automotive Companies

Licensed contractors, hazardous waste, wastewater, tyres, batteries and refrigerant: what the federal and emirate authorities check, **and why oily water in the street costs AED 100,000.**




**AED 1M**
maximum fine under the federal waste law.

**AED 100K**
Dubai fine for illegal wastewater disposal.

**AED 50K**
Dubai fine for hazardous waste dumped illegally.

5 standards | 15 checkpoints | FL 12/2018 · Dubai Law 18/2024 | Right way / wrong way | Ideal fix time

**2018** Federal waste law → **2024** Dubai waste law → **Now** Emirate fine schedules → **Your waste stays your responsibility.**

WHY THIS GUIDEBOOK EXISTS

# Oil, tyres, batteries, paint. All of it is regulated.

The **federal waste law (2018)** sets fines up to **AED 1,000,000**, and each emirate adds its own rules: in Dubai, **AED 100,000** for illegal wastewater and **AED 50,000** for hazardous waste dumped illegally.

This guidebook covers the 5 environmental standards for UAE workshops.

WASTE STREAMS

**All waste**
Licensed contractors
EN-01

**Hazardous**
Oil, filters, paint
EN-02

**Water**
Separator and drains
EN-03

**Tyres & batteries**
Recycled
EN-04

**Refrigerant**
Recovered
EN-05

**Heat**
Shaded storage
EN-02

WHO ENFORCES IT

**MoCCAE**
**Climate Change & Environment**
Federal law and policy

**Dubai Municipality**
**Dubai**
Waste and wastewater fines

**Tadweer / EAD**
**Abu Dhabi**
Waste management and environment

**Other emirates**
**Municipalities**
Local rules

WHO IT'S FOR

**Owners & MDs**
Know the exposure.

**Service & facilities**
Keep waste and water right.

**Auditors**
Follow the waste to the contractor.

FEDERAL CEILING, EMIRATE SCHEDULES

# Oily water in the street. AED 100,000.

Dubai fines **AED 100,000** for illegal wastewater disposal and **AED 50,000** for hazardous waste dumped at unauthorised sites. Federal fines reach **AED 1,000,000**.

## THE PENALTY LADDER

LEVEL 1
**AED 10K**
Hazardous waste moved without a permit (Dubai).

LEVEL 2
**AED 50K**
Hazardous waste at unauthorised site (Dubai).

LEVEL 3
**AED 100K**
Illegal wastewater disposal (Dubai).

LEVEL 4
**AED 1M**
Federal maximum for unauthorised disposal.

## REAL CASES FROM US AUTOMOTIVE BUSINESSES

| WHO | RESULT | WHAT HAPPENED |
|---|---|---|
| **Federal Law 12/2018**<br>UAE | **AED 1M**<br>max | Burning, burying or dumping waste in unauthorised places. |
| **Dubai Law 18/2024**<br>Dubai | **AED 50K**<br>hazardous | Disposal at unauthorised site. |
| **Dubai wastewater**<br>Dubai | **AED 100K**<br>per violation | Illegal wastewater disposal. |

WASH BAY
**AED 100K**
Oily water to the street.

HAZ WASTE
**AED 50K**
Dumped illegally.

AND THEN
**Licence**
Suspension **and cleanup**.

HOW TO USE THIS GUIDE

# One page per standard. Follow the waste.

1. **Header**: code, area, owner and the maximum penalty
2. **The law**: which regulator and which regulation
3. **The cost**: fine, what else can happen and a real case
4. **Right / wrong**: illustrated pass and fail, plus how to audit

## THE 5 STANDARDS

| | | | | | | |
|---|---|---|---|---|---|---|
| EN-01 | Licensed Waste Contractors | FL 12/2018 | CRITICAL | Up to AED 1M | 7 days | 5 |
| EN-02 | Hazardous Waste Stored Right | Dubai Law 18/2024 | SEVERE | AED 50K | 72 hours | 6 |
| EN-03 | Oil Separators & Wastewater | DM rules | SEVERE | AED 100K | Immediate | 7 |
| EN-04 | Tyres & Batteries Recycled | FL 12/2018 | CRITICAL | Up to AED 1M | 7 days | 8 |
| EN-05 | A/C Refrigerant Recovered | Fed. ODS rules | CRITICAL | Fines | 7 days | 9 |

## IDEAL FIX TIME · COUNTED FROM AUDIT SUBMISSION

| | | |
|---|---|---|
| Immediate | Stop now · serious harm or clear breach | 1 standard |
| 72 hours | Fix within 3 working days | 1 standard |
| 7 days | Fix within 1 week · records, notices, training | 3 standards |

## SCORING EACH CHECKPOINT

**PASS**

Every criterion met at the time of audit, with evidence captured.

**FAIL**

Any criterion not met at the time of audit. Record what you saw and who owns the fix.

**N/A**

Only where "Applies when" rules it out. Record why.

**Note.** Fine schedules differ by emirate. Dubai amounts are shown as examples.

EN-01 ENVIRONMENT · MOCCAE / MUNICIPALITY · STANDARD 01 OF 05

# Licensed Waste Contractors

Area **Workshop · Yard** | Person in charge **Service Manager**

Regulator **MoCCAE · DM · Tadweer**

**MAXIMUM PENALTY**

**AED 1,000,000**

maximum · Federal Law 12/2018

Dubai: hazardous waste dumped **AED 50,000** · illegal wastewater **AED 100,000**

**• CRITICAL**

**THE LAW**

**FL 12/2018**

**Federal Law No. 12 of 2018** on Integrated Waste Management · **Federal Law No. 24 of 1999** on the Environment · **Dubai Law No. 18 of 2024** · **Federal Law 12/2018** and emirate rules: licensed waste transporters, manifests

## WHAT WE CHECK

All waste (especially oil, filters, batteries, paint) goes only to licensed waste contractors, with manifests or transfer records kept.

## CHECKPOINTS IN THE AUDIT

- **Q1** Is every waste collector licensed by the emirate authority?
- **Q2** Is every hazardous waste movement documented with a manifest?
- **Q3** Are records kept and retrievable?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Federal waste law fines reach **AED 1,000,000** for disposing of waste in unauthorised places. Emirates add their own schedules.

### BEYOND THE FINE

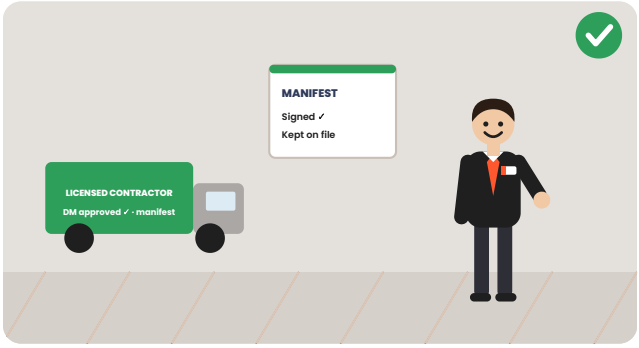
In Dubai: **AED 50,000** for hazardous waste disposed of at an unauthorised site, **AED 100,000** for illegal wastewater disposal, **AED 10,000** for moving hazardous waste without a permit. Licences can be suspended.

### REAL ENFORCEMENT

**AED 1M**

maximum fine under **Federal Law 12/2018** for burning, burying or dumping waste in unauthorised places.

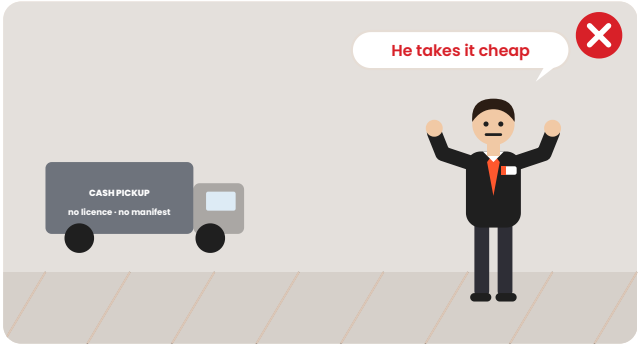
## ✔ RIGHT WAY




Licensed contractor with manifest.

## ✖ WRONG WAY

**UP TO AED 1M**




Unlicensed cash pickup.

## PURPOSE

If an unlicensed collector dumps your waste, it comes back to you.

## FIX IT WITHIN

**◷ 7 days**

## AUDIT CRITERIA · PASS WHEN

- Licensed contractors
- Manifests kept

## IDEAL WAY OF AUDITING

1. Check licences
2. Pull 12 months of manifests

**Evidence:** Licences + manifests.

**WORST CASE** Dumped waste traced back to the dealer: up to **AED 1,000,000**.

EN-02 ENVIRONMENT · MOCCAE / MUNICIPALITY · STANDARD 02 OF 05

# Hazardous Waste Stored Right

Area **Workshop · Body shop** | Person in charge **Service Manager**

Regulator **MoCCAE · DM · Tadweer**

**MAXIMUM PENALTY**

**AED 50,000**

hazardous waste at unauthorised site (Dubai)

Moving without a permit: **AED 10,000**

• SEVERE

**THE LAW**

**FL 12/2018**

**Federal Law No. 12 of 2018** on Integrated Waste Management · **Federal Law No. 24 of 1999** on the Environment · **Dubai Law No. 18 of 2024** · Emirate hazardous waste rules: segregation, labelling, storage

## WHAT WE CHECK

Used oil, filters, coolant, batteries and paint waste are kept separate, labelled, in closed containers on containment, shaded from heat.

## CHECKPOINTS IN THE AUDIT

- Q1 Are hazardous wastes segregated and labelled?
- Q2 Are containers closed, on containment and shaded?
- Q3 Is hazardous waste kept out of general skips?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Federal waste law fines reach **AED 1,000,000** for disposing of waste in unauthorised places. Emirates add their own schedules.

### BEYOND THE FINE

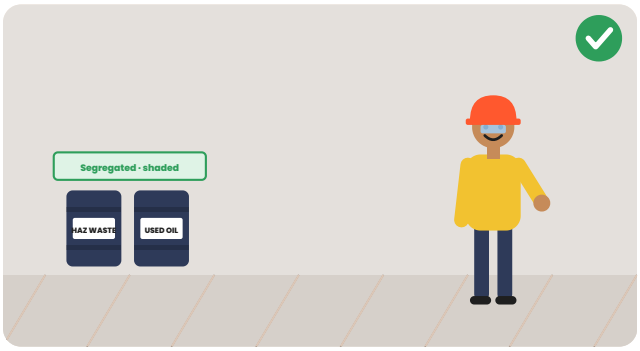
In Dubai: **AED 50,000** for hazardous waste disposed of at an unauthorised site, **AED 100,000** for illegal wastewater disposal, **AED 10,000** for moving hazardous waste without a permit. Licences can be suspended.

**REAL ENFORCEMENT**

**AED 50K**

Dubai fine for disposing of **hazardous waste** at an unauthorised site (Dubai Law 18/2024).

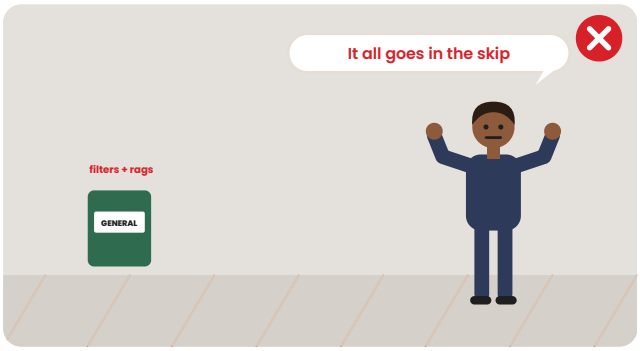
## ✔ RIGHT WAY




Segregated, labelled, shaded.

## ✖ WRONG WAY

AED 50K




Filters in the general skip.

### PURPOSE

Mixed waste is visible to any inspector who looks in the skip.

### FIX IT WITHIN

◷ 72 hours

### AUDIT CRITERIA · PASS WHEN

- Segregation
- Labels
- Closed containers
- Shade and containment

### IDEAL WAY OF AUDITING

1. Look in the skip
2. Inspect the store

**Evidence:** Photos.

**WORST CASE** Unauthorised hazardous waste disposal: **AED 50,000** in Dubai.

EN-03 ENVIRONMENT · MOCCAE / MUNICIPALITY · STANDARD 03 OF 05

# Oil Separators & Wastewater

Area **Wash bay** | Person in charge **Facilities Manager** | Regulator **MoCCAE · DM · Tadweer**

**MAXIMUM PENALTY**

**AED 100,000**

illegal wastewater disposal (Dubai)

Wastewater on roads: **AED 10,000**

• SEVERE

**THE LAW**

**FL 12/2018**

**Federal Law No. 12 of 2018** on Integrated Waste Management · **Federal Law No. 24 of 1999** on the Environment · **Dubai Law No. 18 of 2024** · Municipal wastewater and trade effluent rules; oil separator maintenance

## WHAT WE CHECK

Wash-bay and workshop water goes through a maintained oil separator to the approved drain. Nothing goes to storm drains or the street.

## CHECKPOINTS IN THE AUDIT

- Q1 Is the oil separator cleaned regularly with records?
- Q2 Is wash water discharged only to approved drains?
- Q3 Is nothing hosed onto roads or storm drains?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Federal waste law fines reach **AED 1,000,000** for disposing of waste in unauthorised places. Emirates add their own schedules.

### BEYOND THE FINE

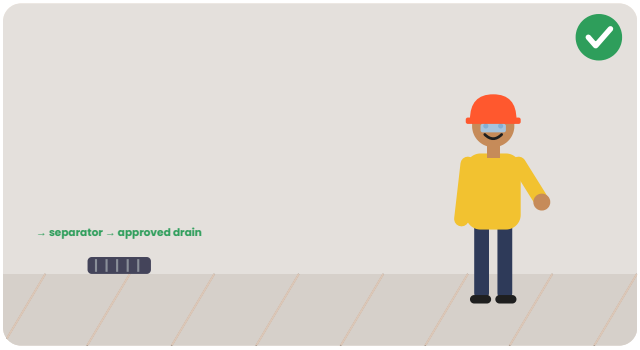
In Dubai: **AED 50,000** for hazardous waste disposed of at an unauthorised site, **AED 100,000** for illegal wastewater disposal, **AED 10,000** for moving hazardous waste without a permit. Licences can be suspended.

**REAL ENFORCEMENT**

**AED 100K**

Dubai fine for **illegal wastewater disposal**, such as oily wash-bay water.

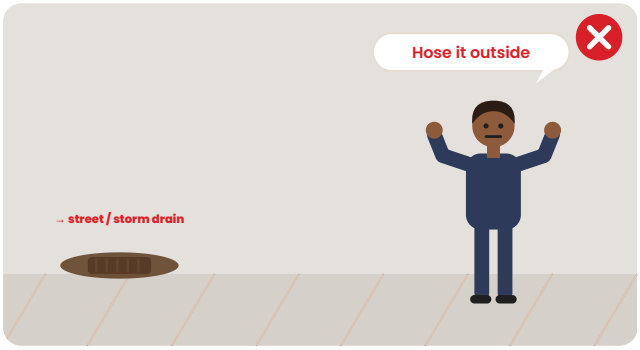
## ✔ RIGHT WAY




Separator to approved drain.

## ✖ WRONG WAY

AED 100K




Oily water into the street.

### PURPOSE

Car washes and workshops are prime targets for wastewater inspections.

### FIX IT WITHIN

Immediate

### AUDIT CRITERIA · PASS WHEN

- Separator serviced
- Approved discharge
- Nothing to storm drains

### IDEAL WAY OF AUDITING

1. Check service records
2. Walk the wash bay

**Evidence:** Records + photos.

**WORST CASE** Illegal wastewater disposal: **AED 100,000** in Dubai.

EN-04 ENVIRONMENT · MOCCAE / MUNICIPALITY · STANDARD 04 OF 05

# Tyres & Batteries Recycled

Area **Tyre bay** | Person in charge **Service Manager** | Regulator **MoCCAE · DM · Tadweer**

**MAXIMUM PENALTY**

**AED 1,000,000**

maximum · Federal Law 12/2018

Dubai: hazardous waste dumped **AED 50,000** · illegal wastewater **AED 100,000**

**• CRITICAL**

**THE LAW**

**FL 12/2018**

**Federal Law No. 12 of 2018** on Integrated Waste Management · **Federal Law No. 24 of 1999** on the Environment · **Dubai Law No. 18 of 2024** · Federal waste law and emirate recycling schemes (e.g., Tadweer, Dubai)

## WHAT WE CHECK

Old tyres and batteries go to licensed recyclers with records. Nothing is stockpiled or dumped.

## CHECKPOINTS IN THE AUDIT

- Q1 Are tyres and batteries collected by licensed recyclers?
- Q2 Are stockpiles kept small and away from heat?
- Q3 Are records kept?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Federal waste law fines reach **AED 1,000,000** for disposing of waste in unauthorised places. Emirates add their own schedules.

### BEYOND THE FINE

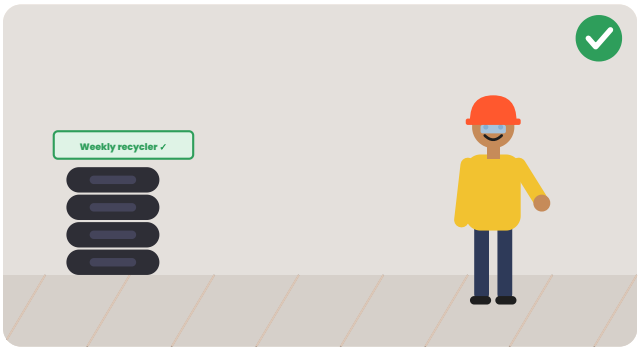
In Dubai: **AED 50,000** for hazardous waste disposed of at an unauthorised site, **AED 100,000** for illegal wastewater disposal, **AED 10,000** for moving hazardous waste without a permit. Licences can be suspended.

### REAL ENFORCEMENT

**AED 1M**

maximum fine under **Federal Law 12/2018** for burning, burying or dumping waste in unauthorised places.

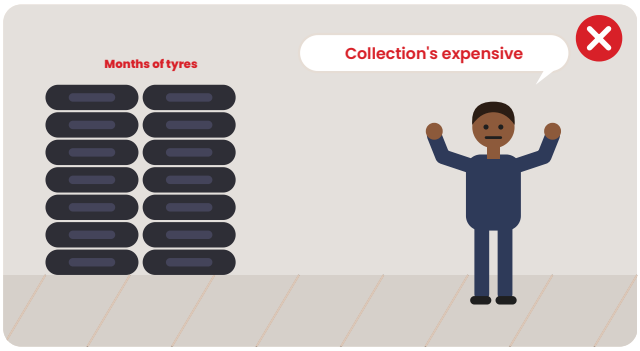
## ✔ RIGHT WAY




Small stack, weekly collection.

## ✖ WRONG WAY

UP TO AED 1M




Months of tyres piled up.

## PURPOSE

Tyre piles are a fire risk in UAE heat.

## FIX IT WITHIN

◷ 7 days

## AUDIT CRITERIA · PASS WHEN

- Licensed recyclers
- Small stockpiles
- Records

## IDEAL WAY OF AUDITING

1. Count stock
2. Check records

**Evidence:** Photos + records.

**WORST CASE** Illegal dumping can reach **AED 1,000,000** federally.

EN-05 ENVIRONMENT · MOCCAE / MUNICIPALITY · STANDARD 05 OF 05

# A/C Refrigerant Recovered

Area **Service** | Person in charge **Service Manager** | Regulator **MoCCAE · DM · Tadweer**

**MAXIMUM PENALTY**

**AED 1,000,000**

maximum · Federal Law 12/2018

Dubai: hazardous waste dumped **AED 50,000** · illegal wastewater **AED 100,000**

**• CRITICAL**

**THE LAW**

**FL 12/2018**

**Federal Law No. 12 of 2018** on Integrated Waste Management · **Federal Law No. 24 of 1999** on the Environment · **Dubai Law No. 18 of 2024** · Federal rules on ozone-depleting substances and HFCs

## WHAT WE CHECK

Vehicle A/C refrigerant is recovered with proper equipment by trained technicians and never vented.

## CHECKPOINTS IN THE AUDIT

- Q1 Is refrigerant always recovered?
- Q2 Are technicians trained on recovery equipment?
- Q3 Are records kept?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Federal waste law fines reach **AED 1,000,000** for disposing of waste in unauthorised places. Emirates add their own schedules.

### BEYOND THE FINE

In Dubai: **AED 50,000** for hazardous waste disposed of at an unauthorised site, **AED 100,000** for illegal wastewater disposal, **AED 10,000** for moving hazardous waste without a permit. Licences can be suspended.

### REAL ENFORCEMENT

**AED 1M**

maximum fine under **Federal Law 12/2018** for burning, burying or dumping waste in unauthorised places.

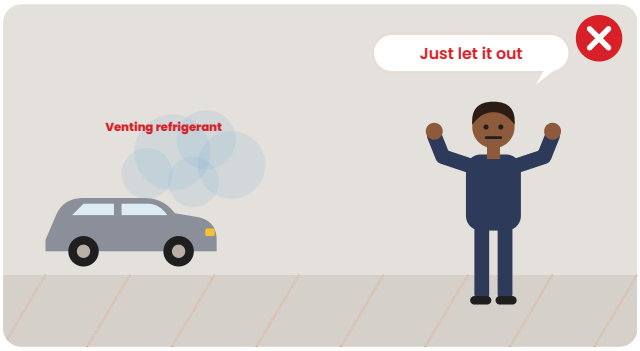
## ✔ RIGHT WAY




Recovered with equipment.

## ✖ WRONG WAY

FINES




Vented into the air.

### PURPOSE

Venting releases powerful greenhouse and ozone-depleting gases.

### FIX IT WITHIN

◷ 7 days

### AUDIT CRITERIA · PASS WHEN

- Recovery equipment
- Trained technicians
- Records

### IDEAL WAY OF AUDITING

1. Check equipment
2. Check records

**Evidence:** Records.

**WORST CASE** Environmental fines under federal law, and possible **licence action**.

FIX IT BEFORE THE WASTE LEAVES

# Your 30-day environmental action plan.

## Today

- [ ] **EN-03** Oil Separators & Wastewater
  Immediate

## This week

- [ ] **EN-02** Hazardous Waste Stored Right
  72 hours
- [ ] **EN-01** Licensed Waste Contractors
  7 days
- [ ] **EN-04** Tyres & Batteries Recycled
  7 days
- [ ] **EN-05** A/C Refrigerant Recovered
  7 days

## This month

Re-audit the site in 30 days.

**?/5** Count your passes. Each fail can cost **AED 10,000 to AED 1,000,000**.

SOURCES

• Gulf News: UAE environmental fines from Dh500 to Dh10 million · gulfnews.com
• Federal Law No. 12 of 2018; Dubai Law No. 18 of 2024 · uaelegislation.gov.ae · dlp.dubai.gov.ae

**Disclaimer.** For compliance-audit guidance only; not legal advice. Check your emirate's current schedule.

AUDIT SIGN-OFF

| DEALERSHIP / SITE | AUDITOR | DATE | SCORE __ / 5 |
|---|---|---|---|
| | | | |

BRANCH / DEALER PRINCIPAL SIGNATURE

COMPLIANCE LEAD SIGNATURE