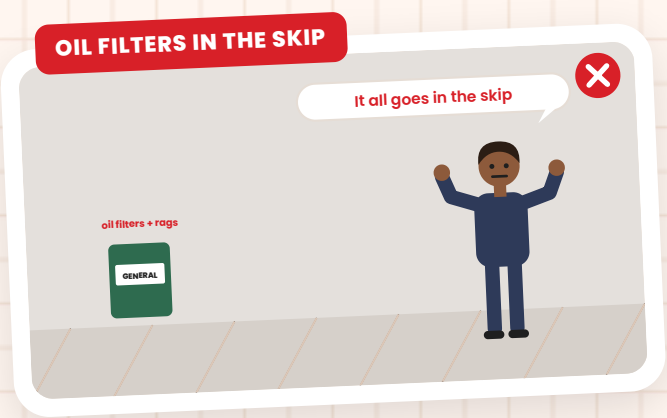
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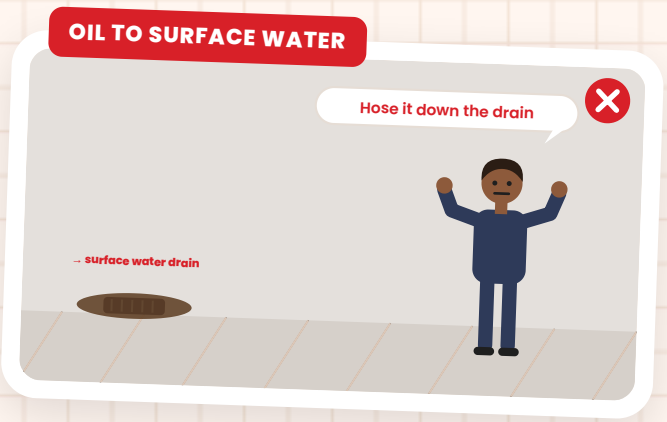
Edition 1 · United Kingdom · 2026

• UNLIMITED FINES · 5 YEARS PRISON Workshop, body shop, tyre bay, wash bay & yard

Environmental & Waste Compliance Guidebook for Automotive Companies

Duty of care, hazardous waste, oil storage, drains, tyres and F-gas: what the Environment Agency checks, **and why your waste stays your problem after it leaves the yard.**





Unlimited
fines for waste and pollution offences.

5 years
maximum prison for illegal waste deposit.

110%
containment required for oil storage of 201 litres+.

6 standards | 18 checkpoints | EPA 1990 · EPR 2016 · HWR 2005 | Right way / wrong way | Ideal fix time

2022 Garage · missing notes → **2023** Tyre firm · £13K → **2026** Sentencing by turnover → **Your waste is still your waste.**

WHY THIS GUIDEBOOK EXISTS

Every service leaves waste the law tracks to you.

Oil, filters, coolant, batteries, paint, tyres, airbags and refrigerant: a dealership produces a steady stream of waste. Under the **duty of care** you remain responsible until it reaches a lawful destination, and offences carry **unlimited fines and up to 5 years in prison**.

This guidebook covers the 6 environmental standards that matter most at a UK dealership.

WASTE STREAMS AND WHERE THEY MUST GO

All waste
Registered carriers, transfer notes
ENV-01

Hazardous
Oil, filters, batteries, paint
ENV-02

Oil storage
110% bunds
ENV-03

Drains
Interceptor to foul sewer
ENV-04

Tyres
Limits and legal collection
ENV-05

Refrigerant
MAC-qualified recovery
ENV-06

WHO ENFORCES IT

Environment Agency
England (SEPA, NRW, NIEA elsewhere)
Permits, inspections, prosecutions

Local councils
Waste enforcement
Duty of care checks, fly-tipping

Water companies
Trade effluent
Consent for discharges to sewer

Courts
Magistrates and Crown Court
Unlimited fines, prison

WHO IT'S FOR

Dealer principals & directors
Understand personal liability for waste.

Service & facilities managers
Keep carriers, notes and bunds in order.

Auditors
Follow the waste from the bay to the carrier.

LIABLE FROM BAY TO DESTINATION

Your waste. Someone else's truck. Still your fine.

If a cheap collector fly-tips your oil or tyres, the duty of care brings it back to you. Waste offences carry **unlimited fines** and, at Crown Court, **up to 5 years in prison**.

THE PENALTY LADDER

LEVEL 1
Fixed penalty
For duty of care paperwork failures.

LEVEL 2
Cleanup
Orders to remove waste and restore land.

LEVEL 3
Unlimited
Fine on prosecution, scaled by turnover.

LEVEL 4
5 years
Prison for illegal deposit or unpermitted activity.

REAL CASES FROM US AUTOMOTIVE BUSINESSES

WHO	RESULT	WHAT HAPPENED
CPS Automotive, Surrey Council · 2022	**£2,564** fine + costs	No waste transfer notes for tyres and engine oil.
GLM Technical Ltd + director EA · 2023	**~£13,000** fines + costs	190 tonnes of tyres without a permit; fabricated waste notes.
Maximum sentence EPA 1990 / EPR 2016	**5 years** prison	Illegal waste deposit or operating without a permit.

MISSING PAPERWORK
£2.5K+
Even a small garage is prosecuted for missing notes.

POLLUTION
Unlimited
Scaled by turnover under sentencing guidelines.

AND THEN
Cleanup
You pay to **clean it up**.

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 6 STANDARDS

ENV-01	Waste Duty of Care ⛓ PRISON	EPA s.34	CRITICAL	Unlimited + prison	7 days	5
ENV-02	Hazardous Waste Consignment Notes ⛓ PRISON	HWR 2005	CRITICAL	Unlimited + prison	72 hours	6
ENV-03	Oil Storage Bunded ⛓ PRISON	Oil Storage Regs 2001	CRITICAL	Unlimited + prison	30 days	7
ENV-04	Drains & Interceptors ⛓ PRISON	WRA 1991 s.85	CRITICAL	Unlimited + prison	Immediate	8
ENV-05	Tyres Stored & Collected Legally ⛓ PRISON	EPR 2016	CRITICAL	Unlimited + prison	7 days	9
ENV-06	A/C Refrigerant (F-gas)	F-gas Regs	SEVERE	Unlimited	7 days	10

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
30 days	Plan and close within 1 month · policies and systems	1 standard

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. Scotland (SEPA), Wales (NRW) and Northern Ireland (NIEA) have their own regulators and some different rules.

autosmart

ENV-01 ENVIRONMENT · EA · STANDARD 01 OF 06

Waste Duty of Care

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

Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine · magistrates' or Crown Court

Crown Court: **up to 5 years in prison**

• CRITICAL | ⛓ PRISON RISK

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **EPA 1990 s.34** duty of care · waste transfer notes kept for 2 years

WHAT WE CHECK

All waste goes to a registered carrier, each transfer has a waste transfer note, and notes are kept for at least 2 years.

CHECKPOINTS IN THE AUDIT

- Q1 Is every waste collector a registered waste carrier (checked on the EA register)?
- Q2 Is there a waste transfer note (or season ticket) for every waste stream?
- Q3 Are notes kept for at least 2 years?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

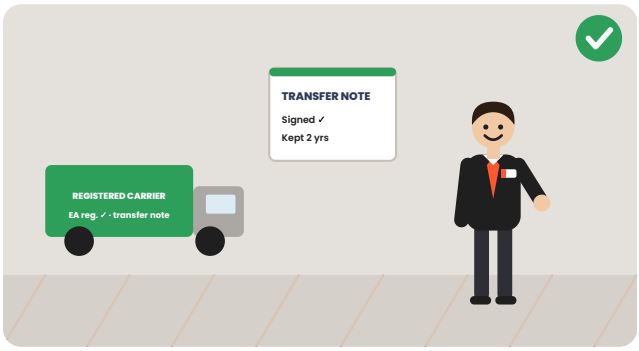
The EA and councils can issue **fixed penalties**, stop notices and **cleanup orders**. Directors can be prosecuted where offences happen with their consent or neglect.

REAL ENFORCEMENT

£2,564

fine and costs for a Surrey garage (2022) that couldn't show **waste transfer notes** for its tyres and engine oil.

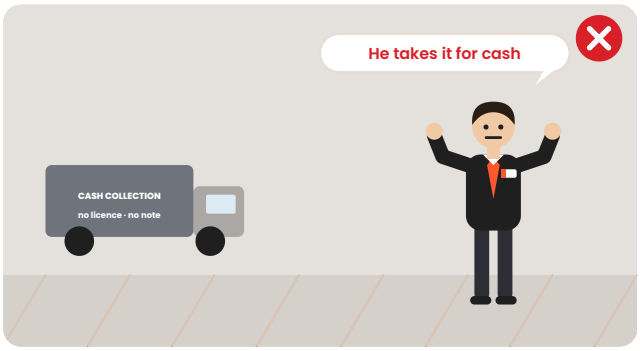
✔ RIGHT WAY



Registered carrier with signed transfer note.

✖ WRONG WAY

UNLIMITED + PRISON



Cash collection with no paperwork.

PURPOSE

If your waste is dumped by an unregistered carrier, you're still liable.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- Registered carriers only
- Transfer notes for every stream
- Kept 2 years

IDEAL WAY OF AUDITING

1. Check carriers on the EA register
2. Request 12 months of notes
3. Match to waste streams

Evidence: Transfer notes + register checks.

WORST CASE A small garage paid **£2,564** for missing notes. If your waste is fly-tipped, it's an **unlimited fine** and cleanup costs.

ENV-02 ENVIRONMENT · EA · STANDARD 02 OF 06

Hazardous Waste Consignment Notes

Area **Workshop · Body shop** | Person in charge **Service Manager · Body Shop Manager** | Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine · magistrates' or Crown Court

Crown Court: **up to 5 years in prison**

• CRITICAL | ⛓ PRISON RISK

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **Hazardous Waste (England and Wales) Regulations 2005**: classification, segregation, consignment notes kept 3 years

WHAT WE CHECK

Oil, filters, coolant, brake fluid, batteries, paint waste and airbags are classified as hazardous, kept separate, and moved with consignment notes kept for 3 years.

CHECKPOINTS IN THE AUDIT

- Q1 Are hazardous wastes identified and kept separate from general waste?
- Q2 Is every hazardous waste movement recorded on a consignment note?
- Q3 Are notes kept for 3 years?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

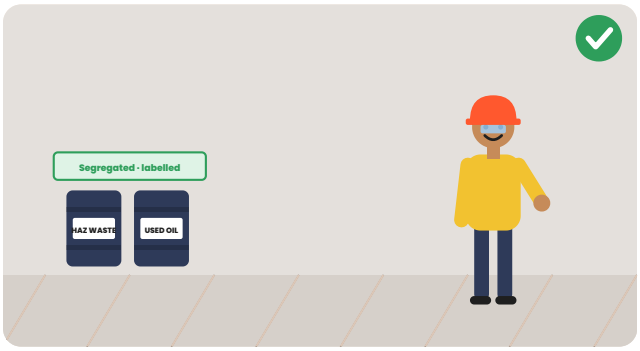
The EA and councils can issue **fixed penalties**, stop notices and **cleanup orders**. Directors can be prosecuted where offences happen with their consent or neglect.

REAL ENFORCEMENT

£13K

fines for a tyre firm and its director (2023): **190 tonnes of tyres** stored without a permit, and fabricated waste notes.

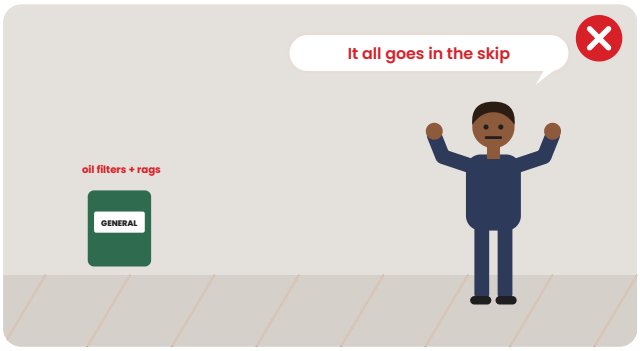
✔ RIGHT WAY



Hazardous waste separated and labelled.

✖ WRONG WAY

UNLIMITED + PRISON



Oil filters in the general skip.

PURPOSE

Mixing hazardous waste into general waste is illegal and easy to spot in a skip.

FIX IT WITHIN

◷ 72 hours

AUDIT CRITERIA · PASS WHEN

- Segregation
- Consignment notes
- Kept 3 years
- Labelled containers

IDEAL WAY OF AUDITING

1. Look in the general skip
2. Check consignment notes
3. Check the store

Evidence: Consignment notes + photos.

WORST CASE Mixing or mis-describing hazardous waste can be prosecuted with **unlimited fines**.

ENV-03 ENVIRONMENT · EA · STANDARD 03 OF 06

Oil Storage Bunded

Area **Lube room · Yard** | Person in charge **Facilities Manager**

Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine · magistrates' or Crown Court

Crown Court: **up to 5 years in prison**

• CRITICAL | ⛓ PRISON RISK

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **Control of Pollution (Oil Storage) (England) Regulations 2001**: secondary containment of at least 110%

WHAT WE CHECK

Oil containers of 201 litres or more (new oil, used oil, gear oil) sit inside a bund or drip tray holding at least 110% of the largest container, kept free of water and debris.

CHECKPOINTS IN THE AUDIT

- Q1 Are all oil containers of 201 litres or more inside secondary containment of at least 110%?
- Q2 Is the bund intact, and free of rainwater and rubbish?
- Q3 Is there a spill kit next to oil storage?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

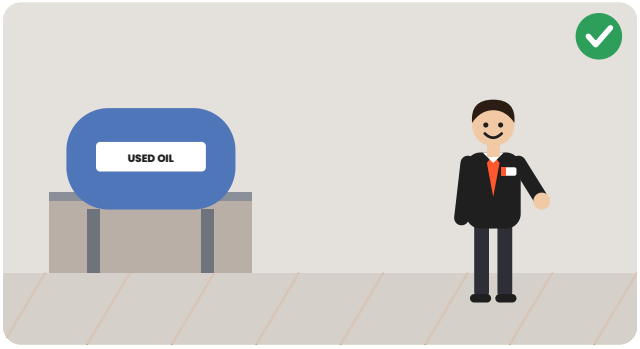
The EA and councils can issue **fixed penalties**, stop notices and **cleanup orders**. Directors can be prosecuted where offences happen with their consent or neglect.

REAL ENFORCEMENT

5 years

maximum prison sentence for illegal waste deposit or operating without a permit.

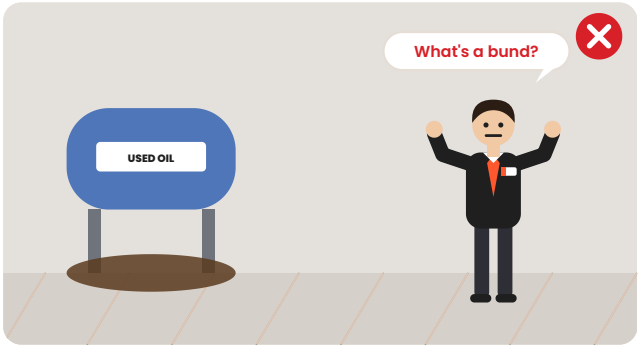
✔ RIGHT WAY



Used oil tank inside a bund.

✖ WRONG WAY

UNLIMITED + PRISON



No bund, oil on the ground.

PURPOSE

Oil on the ground goes straight into drains and groundwater.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- 110% containment
- Bund clean and intact
- Spill kit nearby

IDEAL WAY OF AUDITING

1. Inspect tanks and bunds
2. Check capacity
3. Check the spill kit

Evidence: Photos + tank list.

WORST CASE Pollution from unbunded oil brings **unlimited fines** and cleanup costs.

ENV-04 ENVIRONMENT · EA · STANDARD 04 OF 06

Drains & Interceptors

Area **Wash bay · Workshop** | Person in charge **Facilities Manager**

Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine · magistrates' or Crown Court

Crown Court: **up to 5 years in prison**

• CRITICAL | ⛓ PRISON RISK

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **Water Resources Act 1991 s.85** / **EPR 2016** water discharge activities · trade effluent consent

WHAT WE CHECK

Workshop and wash-bay drains go through a maintained oil interceptor to the foul sewer with consent. Nothing goes to surface water drains.

CHECKPOINTS IN THE AUDIT

- Q1 Is there a drainage plan showing foul and surface water drains?
- Q2 Is the interceptor emptied and serviced regularly?
- Q3 Is there trade effluent consent for wash-bay discharge?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

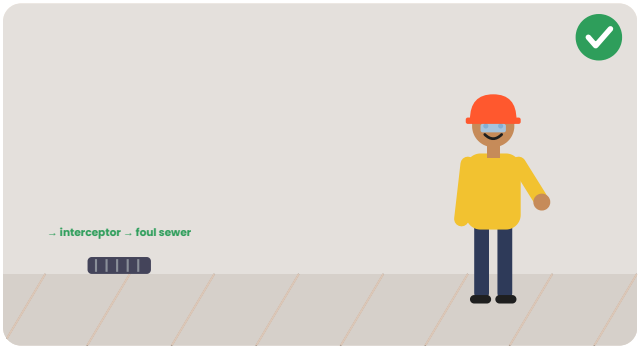
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REAL ENFORCEMENT

5 years

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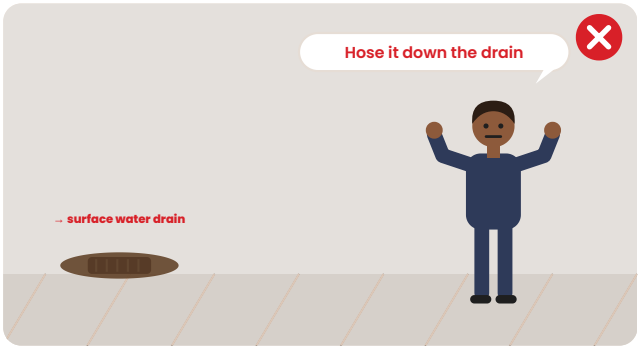
✔ RIGHT WAY



Drain to interceptor and foul sewer.

✖ WRONG WAY

UNLIMITED + PRISON



Oil washed into the surface water drain.

PURPOSE

Surface water drains go straight to rivers.

FIX IT WITHIN

Immediate

AUDIT CRITERIA · PASS WHEN

- Drainage plan
- Interceptor serviced
- Trade effluent consent
- No surface water discharge

IDEAL WAY OF AUDITING

1. Request the drain plan
2. Check interceptor records
3. Check consent

Evidence: Plan + service records + consent.

WORST CASE Water pollution is one of the EA's most prosecuted offences: **unlimited fines, up to 5 years in prison**.

ENV-05 ENVIRONMENT · EA · STANDARD 05 OF 06

Tyres Stored & Collected Legally

Area **Tyre bay · Yard** | Person in charge **Service Manager** | Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine · magistrates' or Crown Court

Crown Court: **up to 5 years in prison**

• CRITICAL | ⛓ PRISON RISK

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **EPR 2016** waste exemptions and permits · duty of care for waste tyres

WHAT WE CHECK

Waste tyres are stored within exemption limits, in a safe stack, and collected by a registered carrier who takes them to a permitted site.

CHECKPOINTS IN THE AUDIT

- Q1 Are waste tyre quantities within the exemption limits?
- Q2 Is the tyre collector a registered carrier taking tyres to a permitted site?
- Q3 Are tyres stored away from buildings and ignition sources?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

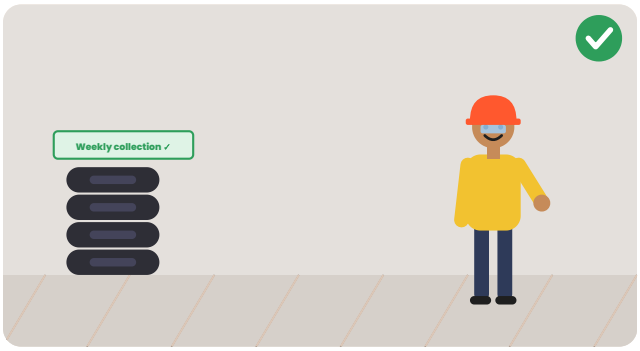
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REAL ENFORCEMENT

£13K

fines for a tyre firm and its director (2023): **190 tonnes of tyres** stored without a permit, and fabricated waste notes.

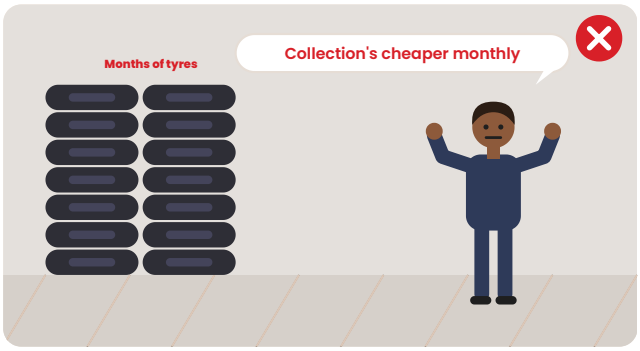
✔ RIGHT WAY



Small stack with weekly collection.

✖ WRONG WAY

UNLIMITED + PRISON



Months of tyres piled up.

PURPOSE

Tyre stockpiles are a fire risk, and a common target for illegal waste operators.

FIX IT WITHIN

◷ 7 days

AUDIT CRITERIA · PASS WHEN

- ✓ Within limits
- ✓ Registered collector
- ✓ Safe storage
- ✓ Transfer notes

IDEAL WAY OF AUDITING

1. Count stored tyres
2. Check collector registration
3. Check notes

Evidence: Photos + notes.

WORST CASE A tyre firm paid **£13,000** for an illegal stockpile and fake notes. Unpermitted storage is an **unlimited fine**.

ENV-06 ENVIRONMENT · EA · STANDARD 06 OF 06

A/C Refrigerant (F-gas)

Area **Service bays** | Person in charge **Service Manager** | Regulator **Environment Agency**

MAXIMUM PENALTY

Unlimited

fine on prosecution · civil penalties available

EA civil penalties for **F-gas breaches**

• SEVERE

THE LAW

EPA 1990

Environmental Protection Act 1990 · **Environmental Permitting Regulations 2016** · **Fluorinated Greenhouse Gases Regulations 2015** · MAC qualification requirements

WHAT WE CHECK

Only technicians with a mobile air-conditioning (MAC) qualification recover and recharge vehicle A/C, using proper recovery equipment. Refrigerant is never vented.

CHECKPOINTS IN THE AUDIT

- Q1 Do all technicians handling vehicle A/C hold a MAC F-gas qualification?
- Q2 Is refrigerant always recovered with proper equipment?
- Q3 Are records kept of refrigerant used and recovered?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

Waste and pollution offences carry an **unlimited fine** and, at Crown Court, **up to 5 years in prison**. Environmental sentencing guidelines scale fines with turnover.

BEYOND THE FINE

The EA and councils can issue **fixed penalties**, stop notices and **cleanup orders**. Directors can be prosecuted where offences happen with their consent or neglect.

REAL ENFORCEMENT

5 years

maximum prison sentence for illegal waste deposit or operating without a permit.

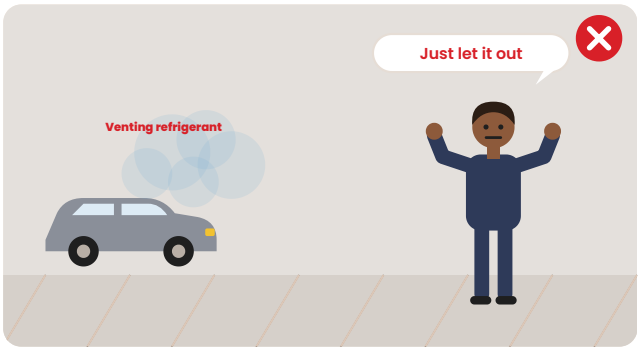
✔ RIGHT WAY



Qualified technician with recovery equipment.

✖ WRONG WAY

UNLIMITED



Refrigerant vented.

PURPOSE

F-gases are powerful greenhouse gases, and venting is an offence.

FIX IT WITHIN

7 days

AUDIT CRITERIA · PASS WHEN

- MAC qualification
- Recovery equipment
- Records kept

IDEAL WAY OF AUDITING

1. Check certificates
2. Check equipment
3. Check records

Evidence: Certificates + records.

WORST CASE F-gas offences can bring civil penalties and **unlimited fines** on prosecution.

FIX IT BEFORE THE WASTE LEAVES THE YARD

Your 30-day environmental action plan.

Today

- [ ] **ENV-04** Drains & Interceptors
  Immediate

This week

- [ ] **ENV-02** Hazardous Waste Consignment Notes
  72 hours
- [ ] **ENV-01** Waste Duty of Care
  7 days
- [ ] **ENV-05** Tyres Stored & Collected Legally
  7 days
- [ ] **ENV-06** A/C Refrigerant (F-gas)
  7 days

This month

- [ ] **ENV-03** Oil Storage Bunded
  30 days

?/6 Count your passes. Every fail can follow your waste to an **unlimited fine**.

SOURCES

- Woking Borough Council: Car garage owner pleads guilty to environmental offence (2022) · woking.gov.uk
- Garage Wire: Waste tyre disposal firm fined for illegal operation (2023) · garagewire.co.uk
- EPA 1990; EPR 2016; Hazardous Waste Regs 2005; Oil Storage Regs 2001; F-gas Regs 2015 · legislation.gov.uk

Disclaimer. For compliance-audit guidance only; not legal advice. Rules differ between England, Scotland, Wales and Northern Ireland.

AUDIT SIGN-OFF

DEALERSHIP / SITE	AUDITOR	DATE	SCORE __ / 6

BRANCH / DEALER PRINCIPAL SIGNATURE	COMPLIANCE LEAD SIGNATURE