

Technical Guidelines on Scrap & Metal Waste Trading Activity



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**Waste Strategy and Projects Department
Dubai Municipality**

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LIST OF ABBREVIATIONS AND DEFINITIONS

DET	Department of Economy & Tourism
DM	Dubai Municipality
NOC	No Objection Certificate
WSPD	Waste Strategy and Project Department
WTS	Waste Treatment Section
RASID	Dubai Municipality has introduced the RASID waste management monitoring system to regulate operations of registered waste management companies by streamlining and monitoring waste management transportation and associated activities – from collection through transit and till disposal, from analysis review to end-user solutions and by controlling illegal and unauthorized dumping practices.
Non-hazardous waste	is a waste or mixture of wastes that does not pose a substantial threat to public health or the environment and is safer to handle, store, and dispose of compared to hazardous waste. However, it can be harmful to the environment if left untreated. This category includes everyday household items like food waste, paper, cardboard, plastics, glass, metals, and textiles, as well as non-toxic industrial waste, uncontaminated construction and demolition debris, organic waste like yard trimmings and agricultural residues, and certain electronic waste.
Hazardous waste	Is a waste or mixture of wastes containing one or more properties of a hazardous substance, i.e., being toxic, infectious, corrosive, flammable, oxidizing, radioactive, reactive or explosive, which, at a certain concentration or condition and improper handling can cause substantial harm to humans, properties or the environment.
Waste Trading	Waste trading activities include purchasing, wholesaling, and retailing of waste to commercial and industrial firms, craftsmen, various bodies and enterprises, and the public for personal and domestic consumption. The sale is carried out before the execution of any converting manufacture on such wastes. This also includes brokering activities to facilitate transactions between the waste generators and suitable waste treatment facilities by a service markup or a commission from the waste treatment facility.
Waste Collection	Collection within the meaning of this guideline is the loading, transport & any interim storage of waste for the

purpose of transportation to a waste disposal and/or treatment plant.

1 INTRODUCTION

In general, this guideline underscores adherence to the specified legal and regulatory framework, ensuring that scrap & metal waste trading activity is conducted in compliance with established laws, circulars, and guidelines. This serves to standardize practices across the industry, promoting sustainable waste management practices, safeguarding public health, and preserving the environment within the Emirate of Dubai. The objectives of this guideline are:

- To guide and ensure that all companies engaged in scrap & metal waste trading activity are operating in the Emirate of Dubai in accordance with this guideline.
- To reduce the volume of waste for disposal to landfill sites.

2 LEGAL FRAMEWORK, CIRCULARS, AND GUIDELINES

The relevant provisions of the following laws and regulations were used as guidance and references in the preparation of this technical guideline.

- Federal Law (No.) 24 of 1999 and modified by Federal Law (No.) 11 for 2006 regarding Protection & Development of the Environment.
- Local Order No. 11 of 2003 on Public Health and Safety of the Society in the Emirate of Dubai
- Local Order (No.) 61 of 1991 on the Environment Protection Regulations in the Emirate of Dubai
- Local Order (No.) 7 of 2002 on Management of Waste Disposal Sites in the Emirate of Dubai; as amended by Local Order No. (5) of 2003
- Executive Council Resolution (No.) 58 of 2017 Concerning the Approval of Fees and Fines of Waste Disposal in the Emirate of Dubai
- Executive Council Resolution No. (14) of 2015 Amending the Schedule of Public Hygiene-related Violations and Penalties Attached to the Implementing Bylaw of Local Order No. (11) of 2003 Concerning Public Health and Community Safety in the Emirate of Dubai
- Procedures and guidelines for implementing and implementing Administrative Order No. 30/2003, in accordance with Local Order No. 11/2003
- UAE Occupational Health and Safety Management System (OHSMS) National Standard
- Technical Guideline No. 4. on Duty of Care
- Technical Guideline No. 5. on Waste Classification
- Technical Guideline on Transport of Garbage Trucks

The related circulars and posted information bulletin of this guideline are posted on Dubai Municipality's website – www.dm.gov.ae link to the Waste Department.

The Duty of Care Program is a management tool to control the waste generated in Dubai. The regulation requires that all transfers of waste are appropriately recorded in order to assist in tracking the quantity generated and movements of waste. Waste collection & transport companies, as primary actors in the duty of care, need to ensure that the waste is safely & properly collected and that the complete waste transport is recorded in the waste manifest along with any other records required by DM. This will ensure that the waste is properly managed at the source, transported by licensed waste management companies and delivered to an approved facility and/or disposed of at proper sites.

3 SCOPE AND COVERAGE

These guidelines and procedures are applicable to scrap & metal waste trading within Dubai. The scope is restricted to companies planning to obtain or already holding a business license for activity 4669102-Scrap & Metal Waste Trading from the Department of Economy & Tourism (DET) or licenses from the Free Zone Authorities in Dubai as applicable to conduct scrap & metal waste trading activity in Dubai. It also permits companies to engage with third-party entities through formal contracts for waste transportation, provided these third parties fully comply with the standards set by the Waste Strategies and Projects Department (WSPD) as mentioned in the Technical Guideline on Transport of Garbage Trucks.

4 GENERAL PROVISIONS

Industrial and manufacturing establishments operating in the Emirate of Dubai produce significant amounts of waste from their various activities. Some of these wastes can be traded to commercial and industrial firms and can be reused, recycled, and/or reprocessed into a new product or for any beneficial purposes. Waste dealers/traders are all companies who acquire waste under their own responsibility and resell it without changing its nature or composition, i.e. pass it on to other companies for the purpose of carrying out or arranging for the carrying out of a treatment/disposal procedure. Whether the waste has a positive market value is also irrelevant to the definition of traders since they can also be companies who accept and pass on waste with a negative market value as well. Traders can sometimes be considered "waste brokers" who arrange waste management measures for third parties. Their responsibility would, therefore, be to bring together the demander (waste generator) and the supplier (waste transporter and/or waste treatment facility) of waste management measures into a contract concluded only between these companies, but they are not contractually responsible to either of these two companies for the implementation of the treatment/recycling measure or process. Their status can, therefore, also exist if the person receives a fee from the previous owner when taking over the waste and pays the recipient a fee for the treatment/disposal or arranging the disposal when passing it on. Such dealers/traders are, in particular, companies who contractually promise waste generators to arrange for the disposal of their waste and who, in order to fulfil this contract, conclude contracts with a disposal/treatment company and possibly also with a transporter in order to have the waste collected, transported and fed into a disposal/treatment process. Waste traders can also play a crucial role within the context of a take-back of waste by the original producer or distributor.

Registration Requirements:

- a) All waste trading companies applying for permits shall secure approval from DET prior to operation by accessing the [Invest Dubai Portal](#).
- b) All companies engaged in waste trading activities or planning to start in such activities shall apply for a prior permit from the WSPD.
- c) All trading companies must have a Dubai Office, a working contact number (mobile and landline) and an email address.
- d) All vehicles used in transporting waste materials shall be required to secure a Permit from the WSPD. Vehicles that will be utilized in all Waste Trading Activities must comply with all the general provisions mentioned in the [Technical Guideline on Transport of Garbage Trucks](#).
- e) A third-party transporting company can be contracted, provided that a formal contract is made. Any activity or accident caused by the third-party transporter shall be the responsibility of the "hiring" company unless otherwise contractually specified between the two parties.
- f) Companies may engage in importing, collecting, and transporting waste/recyclable materials from other Emirates in the UAE or other countries, provided that the local authority where the waste originated approves the same.
- g) Companies engaged in the business of waste trading shall be required to submit on a monthly basis all details of the business activity, including source of material, type of material, weight of material and end-use facility (including export of materials). In summary, it is mandatory to maintain the following records:
 - Type of material traded
 - Total quantity of the material traded per day
 - Details of the source of the waste material
 - Destination of the waste materialA template of the minimum information necessary can be found in Annex 1
- h) The third-party transporter companies shall submit the same to the WSPD - Permits and Awareness Section on a monthly basis and upon request in the prescribed formats, including electronic formats, if any.
- i) Companies are not allowed to collect waste from communal bins provided by DM or from bins of private companies.
- j) Installation of cages or bins for waste collection purposes shall not be allowed except in circumstances wherein the company obtains an NOC from relevant Authorities, including the WSPD and from the owner of the plot or land from which the waste is being collected. Further information on the allowable bin types etc. can be found in the [Technical Guideline on Transport of Garbage Trucks](#).

The following table summarizes the administrative requirements necessary for the trading activity:

Table 1 Administrative requirements for trading activities.

Activities	Requirements
Brokering within Dubai	<ul style="list-style-type: none"> - Valid Waste Trading License from WSPD for the specific waste type - Valid Contract with Waste Generator and with the Waste Treatment/Recycling Facility - Brokers active within a Take-Back Scheme need to provide a valid contract with the manufacturing or distribution company.
Transport within Dubai	<ul style="list-style-type: none"> - Valid Waste Trading License from WSPD for the specific waste type - Valid RASID Certificate for the Vehicles used according to the procedures mentioned in the <u>Technical Guideline on Transport of Garbage Trucks.</u>
Inter-Emirate Import or Export	<ul style="list-style-type: none"> - Valid Waste Trading License from DET for the specific waste type - Export of hazardous waste to other Emirates for reasons other than disposal must have prior written approval from the Waste Treatment Section (WTS). - Import of non-hazardous waste (e.g. Metal waste & Recyclables) must have the necessary approvals of the local authority where the waste originated.

Technical Requirements:

Companies conducting scrap & metal waste trading activities must adhere to the following compliance requirements:

- Ensure that the scrap & metal waste is not contaminated with any hazardous materials or any other impurities that can cause the recycling process to be carried out not in an environmentally sound manner.
- Before initiating the collection of the waste, the trader must inspect the waste to ensure that the quality requirements are sufficiently adhered to.
- Oil, oily emulsions, lubricants or grease should not be visible in any part of the scrap load, except negligible amounts that will not lead to any dripping. Visual inspection shall pay particular attention to those parts of the load where oil is most likely (the bottom).
- Staff shall be trained on potential hazardous properties that may be associated with iron and steel scrap and on material components or features that allow for recognising the hazardous properties. The procedure of recognising hazardous materials shall be documented under the quality assurance system.
- The scrap shall not contain any pressurised, closed or insufficiently open containers of any origin that could cause explosions in a metalwork furnace.
- The scrap shall be graded according to the receiving facility's specification, a standard or an industry specification for direct input to one of the final uses (e.g. production of metal substance or objects by steel work/foundries). The specification used may

- be of an agreed-upon nature across an industry sector (e.g. European Steel Scrap Specification, ISRI) or may be defined by one or more individual final-use companies.
- No hazardous waste shall have been used as input to obtain the scrap except waste for which proof is provided that suitable treatment to remove all hazardous properties is applied in a treatment process which is approved by DM. Therefore, the requirements on input materials shall be included in the specifications/contract with the waste generators.
 - Digital documentation of the quantities and qualities of metal and scrap waste received and traded must be maintained and presented during inspections. For metals, this includes detailed information on type (non-ferrous or ferrous, etc.), alloy composition, weight, and contamination level.
 - Selection of vehicles suitable to transport waste under this technical guidelines are listed in Annex 2.
 - Selection of suitable containers to handle waste under this technical guidelines are listed in Annex 3.

5 REFERENCES




- 1 European Waste Framework Directive 2008/98/EC
- 2 International Standard Industrial Classification of all Economic Activities (ISIC). United Nations Series M No. 4, Rev. 4.
- 3 EUROPEAN STEEL SCRAP SPECIFICATION. Bvse das Recycling Netz https://www.bvse.de/images/pdf/schott-elektro-kfz/schrottsorten_en.pdf
- 4 End-of-waste Criteria for Iron and Steel Scrap. JRC Scientific and Technical Reports <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC58526/jrc58526.pdf>
- 5 European Steel Scrap Specification, ISRI <https://www.isrispecs.org/wp-content/uploads/2023/05/ISRI-Scrap-Specifications-Circular-updated-1.pdf>

ANNEX 1: VALIDITY OF PERMITS

Permits	Validity of Permits
Permit for Waste Collection or Transport or Trading Activity (WCTT)	Valid for the same duration as the license issued by Concerned authorities in Dubai.

ANNEX 2: SELECTION OF SUITABLE VEHICLES

Table 2: Selection of Suitable Vehicles

Vehicle type	Brief Description	Image
Pick up trucks	1 Ton, 3 Ton ,10 ton pick up trucks with side barricades	
Skip Loaders/ Tipper trucks	vehicles with hydraulic arms for lifting and transporting skips.	
Closed Vans	Designed with a boxy shape with a high roof and could be used in trading of small amounts of waste	

ANNEX 3: SELECTION OF SUITABLE CONTAINERS

Table 3: Selection of Suitable Containers

Container Type	Brief Description	
<p>Plastic Waste Boxes</p>	<p>typically made from high-density polyethylene (HDPE) or other sturdy plastics</p>	
<p>Skip Container (Roll-Off)</p>	<p>Large, open-topped containers typically delivered by trucks, used for construction and large-scale waste.</p>	
<p>Waste bags</p>	<p>flexible containers made from various materials, including plastic, biodegradable polymers, and recycled materials, and come in different sizes and strengths to accommodate various types of waste.</p>	

ANNEX 4: TEMPLATE MONTHLY RECORDS OF TRADING ACTIVITIES

Company Information												
Company Name:						Permit Number:						
Business Address:						Makani Number:						
Contact Person Information												
Contact Person:						Phone Number:						
Designation:						Email Address:						
Reporting Period												
From: dd/mm/yyyy				To: dd/mm/yyyy								
#	Date	Waste Information				Source Information		Transporter Information		End-Use Facility		
		Type	Description	Amount (KG)	Container Type	Name	Address	Name	Vehicle License Plate Number	Name	Address	Waste Use