

ENVIRONMENTAL PROTECTION (WASTE DISPOSAL)

There is a growing body of legislation relating to the protection of the environment. In addition, pressures from the general public over recent years has resulted in 'green issues' becoming a factor in the selection of products; recycling of waste being given greater support; and pollution avoidance tactics being adopted more readily.

Environmental issues are extremely wide ranging and include air pollution, water pollution, noise and waste management. Generally speaking, environmental law is separate from health and safety law but there are a number of overlaps and increasingly health and safety issues are becoming environmental issues. Examples are fumes/smells being emitted from premises as a result of work activities or substances being accidentally or purposely disposed of into a water course or down drains etc. This document however, is only intended to cover the topic of waste disposal, including clinical waste.

The Environmental Protection Act 1990 brought in a new regime for waste management. It introduced a duty of care for waste management which means that waste producers, and all those along the waste chain, have a duty to:-

1. Prevent anyone dealing with their waste illegally.
2. Prevent the escape of waste.
3. Ensure that waste is only transferred to an authorised person.
4. Ensure that an accurate description of waste is provided when the waste is transferred and that a transfer note is completed.

The definition of 'controlled waste' is any household, commercial or industrial waste such as waste from a house, shop, office, factory, building site or any other business premise. (You are not under a duty of care for the ordinary household waste produced from your domestic home). Controlled waste includes scrap metal, effluent, clinical waste, unwanted building materials and anything broken, worn out or contaminated. It makes no difference whether it is liquid, solid or even if it is not hazardous or toxic. If anyone produces, imports, stores, treats, processes, transports, recycles or disposes of controlled waste the duty of care will apply and the following steps will have to be taken.

When you have waste you have to store it safely and securely against:-

- Corrosion and wear of any container
- Accidental spilling or leaking
- An accident or the weather breaking open the waste and causing it to escape
- Waste blowing away or falling whilst being stored or transported
- Scavenging of waste by vandals, thieves, children, trespassers or animals etc.

If you hand waste on to someone else it must be secure. Loose materials after loading into a vehicle or skip should be covered. Check that the person taking away your waste is legally authorised to do so. If they are council contracted waste collectors you will not have to check on their credentials, the Council will have done this, but you should ask to see the certificate of registration from other carriers of waste.

When handing over waste a written description of the waste will be required and a waste transfer note completed and signed. The description will need to state the type of waste, i.e. mixed household, food, chemical, clinical etc., the type of premises it came from, details of any substance or chemical or the process that produced the waste. Manufacturers hazard data sheets obtained for COSHH purposes will be essential if chemical substances are being disposed of. It is good practice to label any closed containers with a description of the contents. Both parties will keep a copy of the transfer note which must be retained for two years. Check that you know where your waste is going to for final disposal. Chemicals must be kept separate and not mixed with other waste.

To avoid excess paperwork, repeated transfers of the same kind of waste between the same parties can be covered by one transfer note for up to a year. The system of consignment notes enables waste to be tracked from its final disposal back to the waste producer. For example, if it was found that quantities of incontinence pads or discarded syringes/needles were being sent for landfill or the waste was dumped on route, the waste producer could be traced and prosecuted for breaching the duty of care. Managers must therefore take reasonable steps to look after waste and prevent its illegal disposal by others.

In the case of employees discovering waste which has been washed ashore or dumped on Council land, leave alone and contact the Fire and Rescue Service who will advise on removal. The containers could be fragile, rusty and many contain toxic chemicals. If they should split or leak they could cause injury, contamination or pollution to the environment.

Clinical waste is grouped into five categories:

- GROUP A - Materials (other than linen) from cases of infectious disease. Human tissues, including blood, animal carcasses from vets, hospitals etc. Also soiled surgical dressings, swabs, and other waste from treatment.
- GROUP B - Discarded syringe needles, cartridges, broken glass and other contaminated disposal sharp instruments
- GROUP C - Microbiological culture and infected waste from laboratories and post mortem rooms etc
- GROUP D - Certain pharmaceutical products and chemical waste
- GROUP E - Items used to dispose of urine, faeces and other bodily secretions not in group A (ie incontinence pads, colostomy bags, bed pan liners etc)

The preferred route for all clinical waste is incineration but where this is not always possible then the waste in Groups A and B are the two that MUST be incinerated. Clinical waste must be segregated from non-clinical waste.

The identification system for segregation of waste into waste containers should be made known to all staff who might be involved with waste products. The colour coding is:

<u>COLOUR OF CONTAINER</u>	<u>TYPE OF WASTE</u>
Yellow	Clinical waste for incineration only
Yellow with black stripes	Clinical waste which is suitable for landfill disposal or confidential waste (ie documents) by special collection
Light blue or transparent with light blue lettering	Waste for autoclaving or equivalent treatment before ultimate disposal
Red or white with red band	Foul or infected linen
White or clear plastic	Soiled linen
Black	Normal household waste
Green	Trade or Garden waste

Sharps should be stored in a purpose made container that meets BS 7320 and containers placed in yellow sacks and taken for disposal when full.

General risk assessments should cover all aspects of waste handling where there is a risk of personal injury, contamination or cross infection. COSHH assessments should provide details of the hazard, risk and infection control measures. Managers should ensure that workplace arrangements exist for safe handling and disposal of waste. Since waste is costly to dispose of managers should look carefully at their purchasing arrangements since bulk buying might not always prove cost effective if products such as chemicals finish up being surplus to requirements.

It may be necessary in some workplaces to formulate a procedure or safe system of work dealing with waste. Managers might wish to consider including the following topics:

1. Identification of categories of waste
2. Means of segregation
3. Types of containers/enclosures to be used
4. Storage
5. Transport
6. Handling before disposal
7. Training and information to staff
8. Personal protection
9. Accident and incident reporting
10. Emergency action for spillages
11. Final disposal