

Clinical Waste Pre-acceptance Producer Update

Who does this briefing note apply to ?

This note is aimed at the following producers of healthcare waste who send their waste to clinical waste alternative treatment plants (alternative treatment includes treatment by heat, chemicals and irradiation in order to render clinical waste safe. At present, this mainly relates to treating infectious clinical waste to render it safe by disinfecting):

- Hospitals
- Veterinary practices
- Dental practices
- General practices and health centres
- Community pharmacies
- Ambulance Trusts
- Care Homes that provide nursing care
- Research laboratories that produce clinical waste
- Other medical practices.

It does not apply to domestic premises, care homes that do not provide nursing care, and non-medical producers of clinical waste including tattooists, body piercing, and other minor non-medical procedures in the hair and beauty industry.

What is waste pre-acceptance ?

Clinical waste alternative treatment facilities are required by their permits to obtain additional detailed information on the composition of a waste before they receive it. This information forms part of their 'pre-acceptance' checks. This requirement is not unique to the healthcare sector.

What is required ?

For clinical waste, data including details of the process producing the waste; quantity of waste produced; individual constituents of the waste stream; and, hazards associated with the waste are required for each part of the producer premises. The provision of this information will need to be repeated periodically so you should consider how you will maintain these checks in the medium term. These types of pre-acceptance checks are regarded as current best practice.

Further information on the detailed requirements can be found in section A6 2.1.1 of the following guidance:

[Appendix 6: Sector Guidance Note IPPC S5.06 – Supplementary PPC for clinical waste](#)

Timescales for pre-acceptance compliance

We have acknowledged that implementation of pre-acceptance will take time. However many of the permits were issued as early as 2006 with conditions which required improvement in the way operators deal with pre-acceptance of waste, by certain dates. These dates have now passed so full compliance is expected at such sites.

We will be reviewing compliance of site permits against these conditions in stages over the next twelve months:

- On 1st October 2009 we will be focussing on waste from human or animal healthcare hospitals.
- From 1st April 2010 we will be focussing on waste from veterinary and dental practices.
- From 1st October 2010 we will be focussing on waste from general practices and health centres.
- From 1st October 2010 we will be focussing on waste from all remaining healthcare waste producers, for example, community pharmacies and nursing homes.

Do we have to do it ?

If you send your waste to an alternative treatment plant you must provide the operator with information which will allow him to decide whether the waste can be safely treated at their site. In addition, as producers of waste, you have a legal 'Duty of Care' to take all reasonable steps to keep waste safe. The Duty of Care applies to everyone involved in handling the waste, from the person who produces it, to the person who finally disposes of it, or recovers it. If you give waste to someone else, you must be sure they are authorised to take it. *ie* a registered waste carrier or a permitted site, and can transport, recycle or dispose of it safely. Under the Duty of Care you must provide the person who takes your waste with information that includes, the quantity of waste, EWC code, how it is packed, the substances in the waste and a chemical and physical analysis of the waste.

Therefore, providing the information required as part of the pre-acceptance checks to the treatment plant operator will enable him to decide whether the plant can safely treat the waste and will help you to meet your Duty of Care obligations. We therefore recommend that you provide this information when requested by your waste contractor.

What happens if I don't do it ?

If you do not provide the information and therefore breach the Duty of Care, we could take enforcement action against you. In addition, the operator of the clinical waste alternative treatment plant may no longer be able to accept your waste into their plant as they will not be able to meet their permit condition which requires them to carry out waste pre-acceptance checks before they accept the waste.

Who can undertake the collection of the pre-acceptance data (referred to as the pre-acceptance audit in the Appendix 6 guidance) ?

There are a number of options.

- You may collect the data yourself, however you need to ensure that you understand what is required before doing so.
- You may employ a third party to collect the data on your behalf, or
- Your waste contractor may offer this as a service, for which they may charge. They are not obliged to provide this service.

What should I do if I need further advice ?

If you need further advice on the information requested by the clinical waste treatment site, or you believe that you may struggle to provide this information in the timescales indicated above, you should contact the waste contractor who has requested the information.

Version 2.0
November 2009