
Feature Article

Guide to Dealing with Clinical Waste in the Cosmetic Industry

Cosmetic professionals are under increasing pressure to understand and adhere to clinical waste regulations. Proper management and disposal of clinical waste is vital and there is strict legislation in place to prevent harm being caused to the environment and to human health says our *Guest Author*, **Rebecca Allen from Initial Medical**, experts in healthcare waste management.



To dispel some of the misconceptions around clinical waste and to enable organisations to clearly verify if they need to take further steps to become compliant with all regulations, we have outlined the considerations cosmetic businesses must undertake when disposing of needles and clinical waste safely.

Defining Different Types of Waste

Clinical waste is defined as ***'any waste which consists wholly or partly of human or animal tissue, blood or other body fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, syringes, needles or other sharp instruments'***.

This type of waste may prove hazardous to any person coming into contact with it unless it is rendered safe. Waste is defined as 'hazardous' when the waste itself or the material or substances it contains are harmful to humans or the environment.

The other main waste stream is known as offensive waste, which primarily contains waste that is considered unpleasant due to its appearance and smell, for instance incontinence waste.

Healthcare Waste Legislation

There are many controls in place to ensure that clinical waste is managed safely and disposed of in a way that ensures human health and the environment remain free from harm.

These controls are listed under the Environment Protection Act 1990, where it states that it is "unlawful to deposit, recover or dispose of controlled (including clinical) waste without a waste management licence, or in a way that causes pollution of the environment or harm to human health.

All clinical waste handling and disposal procedures must comply with the following regulations:

- The Environmental Protection Act 1990 (including the Duty of Care Regulations)
- The Controlled Waste Regulations 2012
- The Hazardous Waste Directive 2011
- The Carriage of Dangerous Goods Regulations

The statutory Duty of Care applies to everyone involved in the waste management industry. It states that as a producer of any controlled waste it is your responsibility to ensure correct and proper management of the controlled waste your business produces.

The main principles of Duty of Care are about documenting the transfer of waste and ensuring that your waste is handled correctly by waste carriers (e.g. are you using a registered carrier of waste? are they taking waste to suitably licensed/permitted sites?). You should only use a Contractor who can provide proof of compliance with the legislation.

Important Information for Mobile Operators

From January 2014 you have to register as a waste carrier if you regularly transport waste as part of your business. If you only transport waste that is generated by your own business, such as sharps and clinical waste, you will need to register as a low tier carrier. **You can be fined up to £5,000 if you do not register.**

Registration is quick and easy and most importantly free if you're just transporting your own waste. Once registered, you do not have to renew your registration; however it is advisable to keep a record of your registration number and any other related information.

To register go to www.wastecarriersregistration.service.gov.uk.

The Importance of Your Waste Transfer Paperwork

Waste Transfer Notes:

For all transfers of waste appropriate documentation must be provided. For non-hazardous waste this is usually in the form of a waste transfer note. You will be provided with an annual waste transfer note covering all transfers of non-hazardous waste for a 12-month period. When you receive this documentation you must check this for accuracy purposes and the return slip must be returned to your waste contractor for full traceability.

Hazardous (England & Wales) or Special (Scotland) Waste Consignment Note:

All consignments of hazardous (special) waste must be accompanied by a hazardous or special waste consignment note.

This will include:

- All site addresses and personnel involved with the waste transfer
- A full description of waste type, including required shipping terms
- Correct European Waste Catalogue (EWC) code for each waste stream
- A required copy for you to store on your premises

Waste pre- acceptance:

The Environment Agency has imposed a legal requirement in Environmental Permits for disposal sites to ensure that producers carry out audits of their waste before it can be legally accepted and disposed of. These are known as 'pre-acceptance audits'. Producers will also be required to periodically re-audit sites in the future.

To ensure your waste is suitable for any chosen method of disposal, all your waste streams must be audited, documented and this information relayed to your final disposal site. Failure to do this may leave you in breach of your duty of care responsibilities, which can lead to prosecution and unlimited fines.

Colour Coding

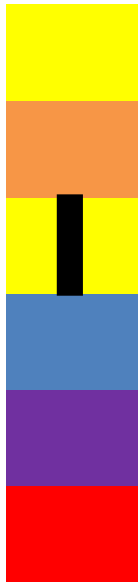
It is essential to segregate clinical waste at the point of production following the "Safe Management of Healthcare Waste" guidance issued by The Department of Health".

By using the national colour coding system detailed, you can easily identify and segregate your waste, and help to drive waste minimisation and best practice within the industry.

Proper segregation of different types of waste is critical to safe management. The mixing of waste streams is prohibited by Law in England and Wales, and best practice in Scotland and Northern Ireland. It also helps support waste minimisation and reduces the risk of exposure and injury to your staff.

All containers used for the disposal of clinical waste must be labelled in accordance with the details of the legal requirements for transporting and packaging waste. Your container labels should clearly identify the waste types present within, and should be signed by the producer ready for onward disposal.

Identifying Your Waste Streams



Yellow - Infectious waste for disposal by incineration

Orange – Infectious waste for disposal by treatment or incineration

Yellow/Black (Tiger) – Offensive/Hygiene waste for disposal by deep landfill

Blue – Medicinal waste for disposal by incineration

Purple – containing cytotoxic or cytostatic waste for disposal by incineration

Red – Anatomical waste for disposal by incineration

Sharps & Medicines Disposal

It is essential that your sharps are segregated and disposed of on the basis of their medicinal contamination. The lid colour of the receptacle relates to how the waste should be treated and disposed of.



Yellow lidded: sharps that are contaminated with medicines (excluding cytotoxic or cytostatic medicines) for disposal by incineration.



Orange lidded: sharps that are not contaminated with medicines for disposal by treatment or incineration



Purple lidded: sharps that are contaminated with cytotoxic or cytostatic medicines for disposal by incineration



Blue lidded: waste medicines for disposal by incineration

The guide above should provide an overview of how to effectively dispose of your clinical waste to avoid compliance issues, and more importantly, harm to other people and the environment.

What to Look For When Choosing a Clinical Waste Management Company

The first and most important thing to check is that you are using a Registered Waste Carrier; you can do this by asking to see a copy of their licences.

The following Top 10 Tips – show what you should look out for:

1. Is the waste carrier licensed to take away the types of waste you are producing?
2. Are the Service Technicians that will be collecting your waste ADR licensed? This is essential when transporting Dangerous Goods such as clinical waste
3. Will you receive all the compulsory waste documentation to cover your waste transfers?
4. Will your waste be fully traceable from point of product through to end disposal?
5. Do all the products supplied to you meet legal requirements, such as UN approval for your sharps containers?
6. Will the supply of products be free of charge or are they an additional cost?
7. Will your waste be fully segregated on site and during transportation, to meet the current regulations?
8. Can the Clinical Waste Management Company guarantee your service delivery will happen on time, every time?
9. Has the service been tailored to your requirements?
10. Are there any hidden charges?

About Initial Medical Waste Experts

Initial Medical is an expert in healthcare waste management, providing a complete collection, disposal and recycling service for hazardous and non-hazardous waste and offensive waste produced by businesses and organisations within the UK.

Initial

The Experts in Healthcare
Waste Management

The safe management of healthcare waste is vital to ensure your activities are not a risk to human health. Initial Medical's healthcare waste services ensure that all of your waste is stringently handled in compliance with legislation and in accordance with Safe Management of Healthcare Waste V2 best practice guidelines, providing you with the peace of mind that you are adhering to current legislation.



For further information please visit www.initialmedical.co.uk or telephone: 0870 850 4045.

Rebecca Allen, Category Manager, Initial Medical

Rebecca has worked in the Healthcare sector for the past 13 years and was a Research Chemist with Bayer Cropscience prior to joining Rentokil Initial in 2003. She keeps up to date on all developments within the clinical waste management industry and is an active member of the CIWM, SMDSA and BDIA.

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