

**Tradebe Healthcare National Ltd
NHS Dumfries & Galloway**

**Guidance for GP Practices and Pharmacies regarding
Healthcare Waste**

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1. Introduction

This guidance is for GP Practices participating within the NHS Scotland national contract for clinical waste commencing in August 2020. The guidance attempts to cover the majority of clinical waste found at GP Practices and Pharmacies.

For clinical waste not covered within this guidance you can contact the following for advice:-

Doug Yorke, Estates Department
Telephone: 01387 246977
e-mail: doug.yorke@nhs.net

Tradebe Customer services
Telephone: 01524 865591
e-mail: Uk.healthcare-customerservice@tradebe.com

Other information is available on the Health Facilities Website in Scottish Health Technical Note 3.

Information contained in the Appendices is there to cover each practice legally with regard to information they should hold with regard to their waste carrier and waste disposal.

2. Guidance Summary

- Please segregate clinical waste as per the waste segregation chart in section 4 of this guidance. The vast majority of clinical waste in Gp's and Pharmacies will be orange bag, Sharps boxes and returned pharmaceutical waste.
- Never put sharps boxes or pharmacy waste tubs in an orange bag
- Returned medicines should be placed in a blue bodied and blue lidded pharma bin (you can still use the yellow bodied bins until the stock runs out).
- Rigid plastic containers are being separated out to allow the plastic to be recycled.
- Please ensure the top of a sharps box is on the right way round and secure before use. This prevents the sharps box from coming open unexpectedly while in use and prevents needle sticks.
- Always complete the label on sharps boxes etc. Do not fill past the 'full' mark on the box.
- Orange bags should be swan necked (folded over) and sealed with ID tape or a cable tie.
- Do not over fill orange bags
- Orange bags should be identifiable to the GP Practice that produced it. This can be done with ID tape or even by writing on the bag with a permanent marker.
- If you have a large yellow clinical waste bin outside it will be impossible to segregate the sharps from orange bags. The driver will empty the bin and segregate out the different waste streams into their van.
- Clinical waste should be stored safely and securely.
- New empty consumables will be dropped off by the driver when they uplift the full bin/box.

If you are in doubt please ask.

Clinical Waste is a major cost for NHS Scotland. Do not put non clinical waste in the clinical waste bins. The cost of clinical waste is three times that of general waste.

3. Outline of key Tradebe contacts




Below is an overview of all the key members of the team, their roles and main responsibilities for the implementation of the NHS Dumfries & Galloway Health Board's contract:



Name	Title	Responsibility	Out of Hours	Email Address	Telephone Number
Diane Cullen	Customer services	Supports the day-to-day operations. NHS direct contact during office hours.	No	Uk.healthcare-customerservice@tradebe.com	01524 865591
Graeme Meldrum	Contract Manager	Managing the contract, projects, meetings etc., and main point of contact.	Yes	graeme.meldrum@tradebe.com	0746490299 5
Kristina Lencesova	Assistant Contract Manager	Managing the contract, projects, waste profile, meetings.	No	Kristina.Lencesova@tradebe.com	0788013716 2

Outline of key members of Tradebe Healthcare team

4. Waste Segregation

Waste	EWC Code	Description	Disposal Operation	Healthcare Site
	180103*	Infectious Clinical Waste <ul style="list-style-type: none"> Soft Waste, PPE etc contaminated in blood/body fluid, IV lines with residual pharmaceuticals /medicinal waste Orange bag 	Alternative Treatment STAATT Level III (D09)	Tradebe Bellshill
	180103*	Infectious Clinical Waste from Containment Level 1 or 2 laboratory and clean rooms.	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Blood Contaminated Sharps <ul style="list-style-type: none"> needles, injectables Orange lidded rigid container 	Alternative Treatment STAATT Level III (D09)	Tradebe Bellshill
	180103*	Foam Mattresses	Alternative Treatment (D09)	Tradebe Bellshill
	180103*	Infectious Anatomical Waste <ul style="list-style-type: none"> Recognisable human tissue Red lidded rigid container Stored on site in freezers 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Sprung Mattresses	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Infectious Clinical Waste <ul style="list-style-type: none"> Soft waste, PPE, etc heavily contaminated with blood/body fluid, IV lines with residual pharmaceuticals /medicinal waste Yellow bags 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Infectious Pharmaceutical Sharps <ul style="list-style-type: none"> Needles, injectables etc that are infectious and contaminated with pharmaceuticals / medicinal / chemicals Blue lidded container 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180106*	Chemicals consisting of or containing hazardous substances <ul style="list-style-type: none"> Chemically contaminated waste Soft waste contaminated in chemicals Yellow bags Yellow rigid containers 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#

Waste	EWC Code	Description	Disposal Operation	Healthcare Site
	180108*	Cytotoxic and Cytostatic Waste <ul style="list-style-type: none"> Cytotoxic and/or cytostatic waste Purple lidded container 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180109	Pharmaceutical Waste (no sharps) <ul style="list-style-type: none"> Non-hazardous pharmaceuticals and medicinal products Blue lidded containers 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180110*	Amalgam waste from Dental Care <ul style="list-style-type: none"> Tooth Pots/Amalgam Teeth extractions with and without fillings 	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180104	Non-infectious Gypsum (Plaster)	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Infectious Gypsum	Incineration (D10)	Tradebe Wrexham#
	180103*	Autoclaved Laboratory Waste that has been decontaminated is not subject to ADR.	Storage (D15) Incineration (D10)	Tradebe Bellshill Tradebe Wrexham#
	180103*	Laboratory Waste (not autoclaved) including: <ul style="list-style-type: none"> Wastes containing hazard groups 2, 3 and 4 pathogen cultures or positive specimens Any waste from a containment level 3 laboratory Any microbiological cultures from any source Any infected waste from pathology departments and other clinical or research laboratories Laboratory Waste classified as Category A waste (UN2814) requires to be packaged in accordance with: <ul style="list-style-type: none"> Packing Instruction P620, or DFT Dangerous Goods Guidance Note 24 and associated Annex A 	Incineration (D10)	Tradebe Wrexham#

Waste	EWC Code	Description	Disposal Operation	Healthcare Site
	180103*	Metal Instruments Potential in future for these items to be in reusable containers and the metal recovered for recycling	Incineration (D10)	Tradebe Wrexham#
	180103*	Genetically Modified Micro-Organisms Class 1	Incineration (D10)	Tradebe Wrexham#
	090101*	Water-based developer and activator solutions	Recovery	Initial Medical
	090104*	Fixer solutions	Recovery	Initial Medical
	150104	Lead foils from X-ray packaging	Recovery	Initial Medical

EWC European Waste Catalogue

5. Tradebe Health care Waste Collections

The Process flow chart below outlines the steps taken for community collections where there is no bin exchange: items are uplifted from site, and replacement consumables left on site; or waste in site bins is decanted into bins on the Contractor’s vehicle.

LOOSE COLLECTION SITES



Process Flow Chart – Illustration of the service for loose and/or decant collection Health Board Sites step-by step

Waste Acceptance

Waste acceptance starts at the point of collection.

Tradebe Requirements

- Waste streams are required to be segregated. Under no circumstance should different clinical waste types be placed in the same bin. Bin Tags as per Appendix 5, should be attached to the bin handles showing the waste contents within the bin. Where the volumes of clinical waste containers such as sharps are small. The sharps box will be collected from within the building.
- The lids of all 770L or 360L wheelie bins are required to be fully closed.
- All sharps container lids are required to be fully secured prior to placing them into wheelie bins for uplift.
- All bags are required to be closed and tied off either by hand (swan neck tie), with a cable tie or tape.
- Burst bags are required to be re-bagged prior to being placed into the wheelie bin.
- All full wheelie bins are required to have the appropriate bin tag attached to the handle ready for uplift.
- Damaged bins must have the 'Defective Bin' tag attached, noting the issue.
- Clinical waste must be identified with name of the source GP practice. For orange bags this can be done with ID tape (which also fastens the bag) or by using a permanent marker to write on the bag. The labels on other waste containers must be fully complete.

Waste Inspection

- The Contractor will open wheeled bins, but not bags, sharps boxes, or other containers within a bin, to check for non-conforming waste.
- The Contractor will report to the customer any non-conforming waste found on initial inspection.
- Photographs shall be taken and forwarded to the driver's line manager.
- THC108a Non-Conforming Waste form will be completed by the Contractor and emailed to the customer.
- The Contractor will not uplift the bin containing non-conforming waste.

a. Orange Stream Waste

Waste Types

Infectious Clinical Waste

Orange Bag



Orange Lidded Sharps



Tradebe Requirements

Sharps must not be stored in bags.

All bags and rigid containers must be:

- Free of any pharmaceutical content
- secured to prevent contents escaping from the packaging
- marked up to identify the producer of the waste

Bags should be no more than $\frac{3}{4}$ full, swan necked and tied off.

Orange lidded sharps are required to be stored separately from orange bag waste, as this will aid in recovering the higher grades of plastic from the waste floc.

Collection

The waste will be collected as per the schedule and requirement agreed with the Health Board and site, ensuring that all service levels are adhered to.

For some community sites, Tradebe have been asked to remove bags from bag holders and complete the tying off process on behalf of the board, this doesn't however remove the responsibility for correctly segregating the waste from the board.

Waste Transfer

Orange stream waste transferred to the Tradebe Bellshill Alternative Treatment facility will be processed as follows:

- Loose orange bag waste from bulk loads is decanted into wheeled bins.
- Loose orange lidded sharps containers are decanted into wheeled bins.
- Each wheeled bin containing either orange bag waste or orange lidded sharps is visually checked, weighed and scanned, synchronising the PDA data to our internal systems. This provides a time stamp confirming when the waste arrived at site.
- Wheeled bins are placed within the designated storage area for the orange stream waste.
- The waste is processed within 5 days of arriving in the Tradebe Bellshill Alternative Treatment facility.
- Wheeled bins are scanned prior to processing. This provides a time stamp confirming when the waste is processed.
- A full inspection of one in every ten wheeled bins is completed as the waste is tipped from the wheeled bin into the hopper.
- If non-conforming waste is identified in the hopper:
 - The process is stopped, the non-conforming waste retrieved and placed in an empty bin prior to being transferred to the Quarantine Area.
 - Inspection frequency is increased to every wheeled bin for the next 6 collections.
 - The customer is notified
- The material once shredded passes through a steam sterilisation process certified to STAAT Level III. This ensures that the hazardous infectious waste is disinfected. The treated floc can be dried (optional) before being compacted and transferred to a suitably licenced facility for energy recovery.

b. Yellow Stream Waste

The yellow infectious waste stream is used for waste that is infectious but which has an additional characteristic that means that it must be incinerated in a suitably licensed or permitted facility. The known examples are:

- anatomical waste (see section Anatomical Waste);
- chemically contaminated samples and diagnostic kits;
- medicinally-contaminated infectious waste;
- Category A pathogens (see section Category A Clinical Waste).

Waste Types

Infectious Clinical Waste



Tradebe Requirements

Sharps must not be stored in bags.

All bags and rigid containers must be:

- secured to prevent contents escaping from the packaging
- marked up to identify the producer of the waste

Tradebe recommend bags are no more than $\frac{3}{4}$ full, swan necked and tied off.

Collection

The waste will be collected as per the schedule and requirement included in Appendix 1, ensuring that all service levels are adhered to.

Waste Transfer

Yellow Stream waste transferred to the Tradebe Bellshill Alternative Treatment facility is:

- scanned in to confirm receipt and time of arrival at site.
- stored in a designated location for up to 10 days.
- transferred to a suitably permitted high temperature hazardous waste incinerator for processing (Tradebe Wrexham).

High Temperature Hazardous Waste Incinerator (Tradebe Wrexham)

- The containers are unloaded and scanned, (synchronising the PDA data to our internal systems if applicable) and a time stamp provided confirming when the waste arrived at site.
- Each 770L bin is weighed on arrival and checks are carried out on one in ten bins to ensure compliance with the waste acceptance procedures.
- The bins are placed within a designated area for the yellow stream waste ready for transferring to a High Temperature Incinerator.

c. Purple Stream Waste

Waste Types

Cytotoxic and/or cytostatic contaminated waste.

Purple lidded container - sharps



Note - Cytotoxic and cytostatic medicinal waste is detailed in the section 'Medicinal waste'.

Tradebe Requirements

All rigid containers must be:

- secured to prevent contents escaping from the packaging
- marked up to identify the producer of the waste

Collection

The waste will be collected as per the schedule included in Appendix 1, ensuring that all service levels are adhered to.

Waste Transfer

Purple Stream waste transferred to the Tradebe Bellshill Alternative Treatment facility is:



- scanned in to confirm receipt and time of arrival at site.
- stored in a designated location for up to 10 days.
- transferred to a suitably permitted high temperature hazardous waste incinerator for processing (Tradebe Wrexham).

High Temperature Hazardous Waste Incinerator (Tradebe Wrexham)

- The containers are unloaded and scanned, (synchronising the PDA data to our internal systems if applicable) and a time stamp provided confirming when the waste arrived at site.
- Each 770L bin is weighed on arrival and checks are carried out on one in ten bins to ensure compliance with the waste acceptance procedures.
- The bins are placed within a designated area for the purple stream waste ready for transferring to a High Temperature Incinerator.

d. Medicinal / Pharmaceutical Waste

Returned and stockpiled medicines will be collected from the community pharmacies on the agreed schedule.


<p><u>Waste Types</u></p> <p>Medicinal Waste (Non-hazardous) Cytostatic)</p>		<p>Medicinal Waste (Hazardous - Cytotoxic or Cytostatic)</p>
		
<p><u>Tradebe Requirements</u></p> <p>Non-hazardous medicinal waste must be stored separately from hazardous medicinal waste. In the case of non-hazardous solid medicines:</p> <ul style="list-style-type: none"> • redact any patient details for cardboard packaging and dispose into the sites recycling waste. • place non-hazardous medicines into the blue-lidded container • place all hazardous medicines (this includes immunosuppressants, antineoplastic, anti-viral and hormonal drugs) into purple lidded containers. <p>All rigid containers must be:</p> <ul style="list-style-type: none"> • secured to prevent contents escaping from the packaging • marked up to identify the producer of the waste (i.e. pharmacy) • stored in a safe location prior to uplift 		
<p><u>Collection</u></p> <p>Medicinal waste shall be collected as per the schedule included in Appendix 1, ensuring that all service levels are adhered to.</p> <ul style="list-style-type: none"> • Returned medicines will be collected from community pharmacies. • Non-hazardous and hazardous medicines will be collected from the Acute Hospital Pharmacy. 		
<p><u>Waste Transfer</u></p> <p>Medicinal Waste transferred to the Tradebe Bellshill Alternative Treatment facility is:</p> <ul style="list-style-type: none"> • scanned in to confirm receipt and time of arrival at site. • stored in designated locations for up to 10 days, ensuring that non-hazardous medicinal waste is stored separately from hazardous (cytotoxic or cytostatic) medicinal waste. • transferred to a suitably permitted high temperature hazardous waste incinerator for processing (Tradebe Wrexham). 		

Appendix 1 - SEPA Consignment Note

In Section A check that:
 - Sections A1, A2 & A3 are pre-filled by Tradebe Healthcare
 - The producer of the waste has been completed in A4
 - NHS Site representative is required to sign Section A8

Special Waste Regulations 1996

Emergency Contact No
0844 6932033



Part A - Consignment Details

1. SA Code: _____ 5. No. of Prenotice _____ 8. On behalf of consignor at A4: _____
 2. Expected removal date of first consignment: _____ Last Consignment: _____
 3. This consignment will be: Single/Succession/Multiple/Other _____ 6. The waste will be taken to: _____ Name: _____
 4. The waste described below is to be removed from: _____ 7. The waste producer was (if different from 4): _____ Signature: _____

Tel: _____

Part B - Description of the waste:

1. The process giving rise to the waste was: _____

List of waste codes (EWC codes)	Quantity (Kg)	Description of Waste	Physical form	Hazard Code	2. SIC for the process giving rise to the waste:											3. Waste Details:						
					Bags	0.5ltr	1ltr	2.5ltr	5ltr	7ltr	11.5ltr	22ltr	36ltr	77ltr	Other							

Carriers Schedule:

2. SIC for the process giving rise to the waste: _____

3. Waste Details: _____

The information given below is to be completed for each EWC identified

EWC codes	UN Identification Number(s)	Proper Shipping Name(s)	UN Class(es)	Packing Groups(s)	Special Handling Requirements

Part C - Carrier's Certificate

I certify that I today collected the consignment and the details in A4, A6 and B3 are correct and I have been advised of any specific handling requirements.

1. Carrier name: _____

2. Carriers registration number: _____

3. Where this note comprises part of a multiple collection the round number and collection number are:

4. Driver's Name: _____ 5. Signature: _____

6. Date: _____ 7. Time: _____

8. Vehicle Registration: _____

Part D - Consignor's Certificate

On behalf of A4, I certify that the consignment details in A, B and C have been completed and are correct, that the carrier is registered or exempt and was advised of the precautionary measures.

All of the waste is packaged and labelled correctly and the carrier has been advised of any special handling requirements.

1. Name: _____ 2. Signature: _____

3. Date: _____ 4. Time: _____

Part E - Consignee's Certificate

1. I have received the waste as described in the table below at the address given in A6 on: a. Date: _____ b. Time: _____ c. Vehicle Registration: _____

2. Where the waste has been rejected please provide details: _____

3. I certify that the waste permit operation number: _____ authorises the management of waste described in B at the address given in A6

4. Name: _____ 5. Signature: _____ 6. Date: _____

on behalf of: A6

EWC codes Received	Total Quantity of each EWC code	EWC Code Accepted/Rejected	Waste Management Operation (Delete as required)

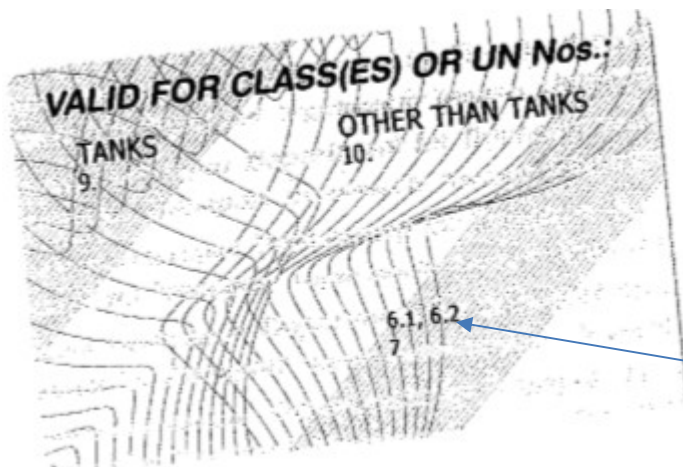
In Section B check that:
 - The EWC classification, description and hazardous components of the wastes the site produces are correct
 - The number of containers and volume of each waste type collected are correct

In section C check that:
 - The driver has printed and signed their name
 - That the carriers and the vehicle registration are present
 - The date and time of collection has been entered

Section E:
 - Completed at a disposal site when the waste

In section D check that:
 - An appropriate NHS Site representative has printed and signed their name
 - The date and time of consignment has been entered
 - A waste hierarchy declaration is included
 - Copy of consignment note to be

Appendix 2 - ADR Driver Training Certificate (Online Example)



6.2 is the ADR classification of the collection of clinical waste.

Appendix 3 - Tradebe Carriers Certificate

Certificate of Registration under the Waste (England and Wales) Regulations 2011

Regulation authority

Name	 Environment Agency
Address	National Customer Service Centre 99 Parkway Avenue Sheffield S9 4WF
Telephone number	03708 506506

The Environment Agency certify that the following information is entered in the register which they maintain under regulation 28 of the Waste (England and Wales) Regulations 2011.

Carriers details

Name of registered carrier	TRADEBE HEALTHCARE NATIONAL LIMITED
Registered as	an upper tier waste carrier, broker and dealer
Registration number	CBDU194332

Address of place of business	TRADEBE MANAGEMENT LTD GLOBE PARK MARLOW SL7 1EY
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Telephone number	07918783783
Date of registration	Thursday 10th August 2017
Expiry date of registration (unless revoked)	Wednesday 9th September 2020

Making changes to your registration

Your registration will last 3 years and will need to be renewed after this period. If any of your details change, you must notify us within 28 days of the change.

Appendix 4 - Tradebe Bellshill Permit

The page below is the IPPC Permit for the Tradebe site at Bellshill. The full version of the permit is available from NHS Dumfries and Galloway Estates Department or is available through SEPA on the internet.

SCOTTISH ENVIRONMENT PROTECTION AGENCY

Pollution Prevention and Control Act 1999

Pollution Prevention and Control (Scotland) Regulations 2012 ("the Regulations")

PERMIT TO OPERATE A 'PART A' INSTALLATION

Permit Number: PPC/A/1180708

Operator: Tradebe Healthcare National Limited

The Scottish Environment Protection Agency ("SEPA"), in accordance with the Regulations, hereby grants a permit to Tradebe Healthcare National Limited, company registration number 0388253 having its registered office at Atlas House, Third Avenue, Globe Park, Marlow, Buckinghamshire, SL7 1EY ("the Operator") to operate an installation on a site at Bellshill Healthcare Waste Treatment and Transfer Site, Building 2, 100 Inchinnan Road, Bellshill Industrial Estate, Bellshill, ML4 3NT more particularly described in Schedule 1 of this permit, subject to the requirements of the Regulations and to the conditions contained in the Schedules to this Permit.

Signed.....
Authorised to sign on behalf of the
Scottish Environment Protection Agency

Date: 10 October 2019

Right of Appeal

Under Regulation 58 of the Regulations you are entitled to appeal to the Scottish Ministers against any condition or conditions of this Permit within six months of the date of this Permit, except where SEPA has granted this Permit in implementation of a direction to SEPA of the Scottish Ministers. The bringing of an appeal will not have the effect of suspending the operation of the said condition or conditions. The procedures for the making of an appeal are set out in Schedule 8 of the Regulations.