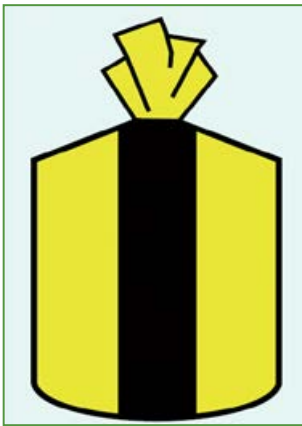


Managing offensive/hygiene waste safely



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Summary

This guidance provides advice on how to handle offensive/hygiene waste safely. It is primarily aimed at managers and supervisors of those collecting and handling such waste and aims to prevent ill health to employees who handle this type of waste.

The guidance describes what offensive/hygiene waste is, what the hazards are associated with handling it and the control measures to take to reduce the risk.

Introduction

This guidance was produced by the Health and Safety Executive in consultation with Waste Industry Safety and Health Forum (WISH). It identifies what offensive/hygiene waste is and is aimed at managers and supervisors in waste management operations where employees may come into contact with offensive/hygiene waste. These can include municipal and commercial waste collection, material recovery facilities (MRFs), transfer stations, landfill and incinerators. However it is also relevant to producers of offensive/hygiene waste such as hospitals, community healthcare workers, nursing homes and nurseries and commercial or industrial premises.

The guidance sets out how to assess and manage the risks associated with handling offensive/hygiene waste produced by healthcare (medical care) practices or healthcare workers in the community and those produced in the community from non-healthcare (personal care) sources. It identifies the control measures that can be taken to reduce the risk of ill health caused by offensive/hygiene waste found in the municipal and commercial waste/recycling streams.

The guidance **does not** cover specialist treatment and pre-treatment of wastes and waste defined under environmental legislation as 'hazardous healthcare wastes that is hazardous from its infectious nature or its medicinal or chemical properties'. These wastes should be handled, transported, treated and disposed of as set out in guidance from the Environment Agency¹ and the Department of Health.²

What is offensive/hygiene waste?

Offensive/hygiene waste (previously known as 'sanpro' or human hygiene waste) is not 'clinical waste', 'hazardous' or 'special waste' (in Scotland) under environmental legislation and not dangerous goods under transport legislation if it:

- is considered non-infectious;
- does not require specialist treatment or disposal.

See Schedule 1 of the Controlled Waste (England and Wales) Regulations 2012,³ which describes offensive waste as waste that:

- is not clinical waste;
- contains body fluids, secretions or excretions, and falls within code 18 01 04, 18 02 03 or 20 01 99 in Schedule 1, List of Wastes

(England) Regulations 2005,⁴ in relation to England, or the List of Wastes (Wales) Regulations 2005, in relation to Wales.⁵

Offensive/hygiene wastes are the product of a population which is not known to be infectious. The waste can also be offensive in appearance and smell. When handled, there is a residual health risk, which should be assessed, and appropriate precautions should be implemented. However, provided the waste is appropriately wrapped, properly handled and free from excess liquid, the risk of ill health is considered to be low.

Offensive/hygiene waste includes:

- human and animal waste (faeces);
- incontinence pads;
- catheter and stoma bags;
- nappies;
- sanitary waste;
- nasal secretions;
- sputum;
- condoms;
- urine;
- vomit and soiled human bedding from a non-infectious source;
- medical/veterinary items of disposable equipment such as gowns etc;
- plasters (minor first aid or self care) generated by personal use;
- animal hygiene waste (eg animal bedding);
- waste from non-healthcare activities, eg waste from body piercing or application of tattoos (excluding sharps).

Municipal waste from domestic first aid and self care – of a type that does not involve the need for a healthcare practitioner – is assumed to be non-infectious unless a healthcare practitioner indicates otherwise. This includes nappies and sanitary products.

Where waste management organisations have any doubt about the classification of materials collected they should consult the waste producers and, if necessary, refer to the Environment Agency, Natural Resources Wales or Scottish Environment Protection Agency (SEPA) as appropriate.

Guidance on the classification of healthcare waste can be found in *Hazardous waste: Interpretation of the definition and classification of hazardous waste*¹ and *Safe management of healthcare waste*.²

Guidance on managing other healthcare wastes is outside the scope of this document.

Managing the risks

Every year, thousands of workers have the potential to be ill following exposure to harmful microorganisms or other hazardous substances. Employers are responsible for taking effective measures to control exposure and protect health. The main relevant legal requirements are contained in the Control of Substances Hazardous to Health Regulations 2002 (COSHH).⁶ These include assessing the risk from harmful substances and preventing or controlling exposure to them.

This means employers should consider how employees (and others) may be exposed to harmful substances or microorganisms and decide whether they are doing enough to prevent this from happening. Employers should always try to prevent exposure at source. If exposure cannot be prevented, put suitable measures in place to control it adequately.

COSHH requires employers to take the following general steps to assess and manage the risk of ill health by preventing or reducing workers' exposure to hazardous substances:

- find out what the health hazards are from harmful substances and microorganisms;
- identify who might be harmed and how;
- decide how to prevent or reduce that harm;
- implement appropriate control measures;
- make sure those control measures are used and kept in good order;
- monitor and review the risk assessment regularly or if there is a significant change.

More information on assessing health risks in accordance with COSHH can be found at www.hse.gov.uk/coshh/index.htm.

What hazards are associated with offensive/hygiene waste?

Offensive/hygiene waste has the potential to harm the health of those exposed to it.

Typical effects can be:

- skin/eye infections (eg conjunctivitis);
- gastroenteritis (symptoms include stomach cramps, diarrhoea and vomiting).

Further information on this can be found in *Health and hazardous substances in waste and recycling*.⁷

Who it is at risk?

People who may be exposed to offensive/hygiene wastes include:

- collection workers/loaders;
- pickers hand sorting on picking lines/conveyor belts in materials recovery facilities (MRFs);
- maintenance engineers/employees working on equipment in facilities where waste is sorted;
- health and social care workers;
- waste transfer facility operators;
- washroom waste collection service workers;
- vulnerable members of the public (eg children or elderly people).

Control measures

Communication and coordination

Good communication and coordination is essential between producers and others in the waste management chain to ensure that offensive/hygiene waste is handled and treated in a way that will ensure the health and safety of workers. Producers, clients and contractors may all have responsibilities to ensure the health and safety of their own employees and others. This should include:

- discussion with waste contractors or the relevant local authority to identify the best way to manage this waste type on an individual site basis;
- operating separate/segregated collections for this waste type, and adopting the same colour-coded system identified in *Safe management of healthcare waste* to bag/box this waste.

Safe systems of work

There should be clear procedures for the identification, segregation, storage collection, transport, handling and disposal of offensive/hygiene waste. Further guidance on this is provided below.

Identification of the offensive/hygiene waste

It is important that the waste producers (eg healthcare professionals or those operating commercial/industrial premises) are aware of the need for proper identification and handling of this waste.

Offensive/hygiene waste should be identified and adequately contained before it enters the waste management stream. Use of the colour-coded segregation system outlined in *Safe management of healthcare waste* is recommended. **Note: Yellow bags with black stripes ('tiger bags') are used for offensive/hygiene waste.**

Where wastes are not adequately identified, waste management organisations should contact the waste producers to clarify the type of waste and to seek improvements in future. It may also be necessary to contact the relevant environment agency if wastes remain unidentified.

Segregation

Producers of offensive/hygiene wastes should make sure there is robust segregation of materials. This will enable materials to be properly labelled, stored, transported and treated.

Where waste management organisations find that wastes are not properly segregated, producers should be notified and improvement sought.

Storage and opening bags

The following practices will help ensure the safe storage and opening of bags:

- Offensive/hygiene waste should be stored in designated areas before treatment or disposal.
- Avoid opening bags. Effective segregation at source will eliminate/reduce the need to open bags.
- Where bags have to be opened, mechanical aids or handled tools can reduce the risk of injury and contact with potentially harmful material.

Procedures should be in place for handling and packaging sharps and other contra-materials that have been incorrectly placed in the offensive/hygiene waste stream. This will include providing dedicated/labelled receptacles, tools and personal protective equipment. Further guidance on this can be found in *Health and hazardous substances in waste and recycling*.

Collection/safe transport of offensive/hygiene waste

A safe system of work should include:

- bag/receptacle collection procedures and clear roles and responsibilities for all staff;
- collections frequent enough to ensure the storage capacity of the site is not exceeded;
- effective recording of the receipt and transfer of waste materials (this can help in the identification of poor segregation and labelling by producers and clients);
- handling of bags kept to a minimum and materials transferred, transported or handled to prevent rupturing of bags. Bags should not be manually compacted to increase capacity;
- collectors/loaders only removing bags that are clearly marked/labelled;
- arrangements for reporting spillages, inadequate or incorrect packaging and labelling of excessively heavy consignments – collectors/loaders need to know who to tell and how to contact them;
- a safe system for avoiding spillages during transportation. Placing bags within wheeled bins or other suitable rigid containers, or loading them directly into leak-proof vehicles or containers, can reduce the risk of spillage. Spillages/leakage of waste stored at the customer's site should be dealt with by site staff following their own organisation's clean-up procedures;
- providing appropriate personal protective equipment;
- what to do in an emergency, eg sharps found in offensive/hygiene waste and injury sustained, as well as fire and first-aid procedures.

Lifting/handling

Bags should not be overfilled, eg be more than three-quarters full, and should be tied at the neck. Contents should be double bagged if there is a possibility of leakage.

Collectors/loaders should:

- handle offensive (and domestic) waste bags by the neck and should not drop, drag or throw bags;
- not accept or remove overfilled or leaking bags.

Handling aids such as wheeled bins can be used to reduce the risk of manual handling injuries when there is frequent handling of bags. Wheeled bins also have the benefit of containment and protection of the bags. However some disposal sites (eg some energy from waste plants and landfill sites) may not have facilities for accepting bins and your risk assessment should identify how the bags should be handled safely.

Disposal

Offensive/hygiene waste may be recycled, incinerated (including energy from waste facilities) or landfilled in suitably permitted/licensed facilities.

This waste should not be compacted unless in accordance with the conditions of an environmental permit or relevant waste exemption. Where compaction is undertaken, a COSHH assessment should be carried out to establish whether there is a risk of exposure to bioaerosols and, if necessary, procedures put in place to contain, minimise, and monitor them.

Liquid offensive/hygiene waste cannot be sent for disposal to landfill, but should be disposed of through the normal sewage system.

Equipment

Provide appropriate equipment such as litter-picking tongs, hand brushes, shovels and rigid containers (for the removal of sharps and other hazardous/infectious waste) to deal with spills, unexpected waste etc. It may be necessary to implement procedures for cleaning and disinfecting equipment (eg picking tongs).

Personal hygiene

The most common way that microorganisms and other harmful substances enter the body is:

- by eating, drinking or wiping the face with contaminated hands or gloves;
- through cuts, scratches or penetrating wounds such as injuries from hypodermic needles;
- through the surfaces of the eyes, nose and mouth;
- by breathing them.

Good personal hygiene when handling offensive/hygiene waste is crucial and will reduce the residual hazards that can lead to ill health. This is likely to include:

- a clearly defined personal hygiene regime for all employees. It is essential that employees wash their hands before eating, drinking, smoking or using the phone, taking medication, inserting contact lenses or before and after wearing gloves, using the toilet or after becoming contaminated with infected material;
- providing adequate hand washing facilities including mild soap. Avoid strong or abrasive cleansers that can cause irritant dermatitis;
- provision and use of appropriate protective clothing, especially gloves and safety boots. Select appropriate personal protective clothing for the job and ensure that employees use it.

Vaccinations

Employers should consider offering vaccinations against:

- hepatitis A, where a risk assessment reveals exposure to, including contamination with, human faecal matter is likely;
- hepatitis B, where a risk assessment reveals direct contact with contaminated body fluids is likely.

Training

Ensure that all employees and managers understand the risks through proper instruction, training and supervision. All staff should be aware of the procedures to follow to minimise the risk of ill health and know what to do if unexpected hazardous waste is encountered. They should be able to recognise the different coloured containers and bags, know why the different waste types should be kept separate and know that offensive/hygiene waste should not be compacted on site (unless in accordance with the conditions of an environmental permit or relevant waste exemption).

Awareness of the hazards and the need to exercise good personal hygiene should regularly be emphasised to staff. Encourage employees to keep vaccinations up to date (periodic reminders with pay notifications etc can help).

Reporting incidents

Employees should:

- report any cases of ill health to their manager or the organisation's occupational health department;
- let their doctor know about their work activities when they visit them.

Employers should:

- record and monitor cases of ill health with a view to identifying patterns/trends of ill health in the workforce that may be work related.

Procedures for dealing with unexpected offensive/hygiene waste

There may be occasions when offensive/hygiene waste is found unexpectedly, eg on picking lines at material recovery facilities (MRFs), in energy from waste (EFW) plants and at landfill sites. This can expose workers to a risk to their health from offensive/hygiene waste either by direct or indirect contact. Procedures should be in place to reduce the risk of ill health. These should include:

- having a system in place to deal with spills, seepage or contaminants if unexpected offensive/hygiene waste is identified. This could involve:
 - safely removing contaminants using appropriate equipment;
 - wearing suitable protective gloves;
 - disposing of them safely;
 - recording the incident in accordance with company procedures;
- tracing back to the waste producer (where possible) when unacceptable quantities of offensive/hygiene waste are found, to resolve waste classification and disposal issues.

References and further reading

References

1 *Hazardous waste: Interpretation of the definition and classification of hazardous waste* Technical Guidance WM2 Environment Agency 2013
www.environment-agency.gov.uk/business/topics/waste

2 *Safe management of healthcare waste* Department of Health 2013
www.gov.uk/government/publications/guidance-on-the-safe-management-of-healthcare-waste

3 *The Controlled Waste (England and Wales) Regulations 2012*
SI 811/2012 The Stationery Office

4 *List of Wastes (England) Regulations 2005* SI 895/2005
The Stationery Office

5 *List of Wastes (Wales) Regulations 2005* SI 1673/2005
The Stationery Office

6 *Control of substances hazardous to health (COSHH). The Control of Substances Hazardous to Health Regulations 2002 (as amended). Approved Code of Practice and guidance L5 (Sixth edition)* HSE Books 2013 ISBN 978 0 7176 6582 2 www.hse.gov.uk/pubns/books/l5.htm

7 *Health and hazardous substances in waste and recycling Waste27*
HSE 2013 www.hse.gov.uk/pubns/waste27.htm

Further reading

Infection at work: Controlling the risks Advisory Committee on Dangerous Pathogens 2003 www.hse.gov.uk/pubns/infection.pdf

Protection against blood-borne infections in the workplace: HIV and hepatitis Advisory Committee on Dangerous Pathogens 2009
www.hse.gov.uk/biosafety/diseases/bbv.pdf

Stay clean – stay healthy. Looking after your health in the waste/recycling industry INDG415 HSE Books 2007 www.hse.gov.uk/pubns/indg415.htm

Waste management. The duty of care. A code of practice DEFRA 1996
www.archive.defra.gov.uk/environment/waste/controls/documents/waste-man-duty-code.pdf

Working with sewage: The health hazards – A guide for employees
INDG197 HSE Books 1995 www.hse.gov.uk/pubns/indg197.htm

Working with substances hazardous to health: A brief guide to COSHH
Leaflet INDG136(rev5) HSE Books 2012 www.hse.gov.uk/pubns/indg136.htm

Useful links

HSE's website: www.hse.gov.uk

HSE's waste website: www.hse.gov.uk/waste

HSE's COSHH website: www.hse.gov.uk/coshh/index.htm

Environment Agency (England and Wales): www.environment-agency.gov.uk

Natural Resources Wales: www.naturalresourceswales.gov.uk

Scottish Environment Protection Agency: www.sepa.org.uk

Further information

For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit www.hse.gov.uk/. You can view HSE guidance online and order priced publications from the website. HSE priced publications are also available from bookshops.

This guidance is issued by the Health and Safety Executive. Following the guidance is not compulsory, unless specifically stated, and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance.

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This document is available at www.hse.gov.uk/pubns/waste22.htm.

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The Waste Industry Safety and Health (WISH) forum exists to communicate and consult with key stakeholders, including local and national government bodies, equipment manufacturers, trade associations, professional associations and trade unions. The aim of WISH is to identify, devise and promote activities that can improve industry health and safety performance.

www.hse.gov.uk/waste/wish.htm