

Dear Colleague

NHSScotland Waste Management Action Plan 2013-2016

Summary

1. This letter provides colleagues with a copy of the **NHSScotland Waste Management Action Plan 2013-2016** ([Annexe A](#)) and associated **Board Audit Template** ([Annexe B](#)).

Action

2. **The NHSScotland Waste Management Action Plan 2013-2016 builds on previous action plans issued in 2002 and 2007 and supersedes all previous versions with immediate effect.**

Background

3. The Waste (Scotland) Regulations 2012 came into force on 17 May 2012 and impose a number of requirements on NHS Boards. The NHSScotland Waste Management Action Plan 2013-2016 highlights the key steps to be undertaken in order to ensure compliance.

Further Information

4. To assist in monitoring the implementation of the NHSScotland Waste Management Action Plan 2013-2016, Health Facilities Scotland's Waste Management Steering Group has produced a **Board Audit Template** to enable all NHSScotland Health Boards to identify and track progress on the key waste management actions.
5. NHS Boards should regularly audit and update progress using this tool, ideally at least once per year.

CEL 14 (2013)

10 July 2013

Addresses

For action

Chief Executives, NHS
Boards
Chief Executives, Special
Health Boards
Strategic Facilities Group
Scottish Property Advisory
Group

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6. Copies of this CEL with attached NHSScotland Waste Management Action Plan 2013-2016 and Board Audit Template are available for download at the following websites: Scottish Health On The Web, Health Facilities Scotland, SGHSC Capital and Facilities.

<http://www.show.scot.nhs.uk/publications/publication.asp>

<http://www.hfs.scot.nhs.uk/>

<http://www.pcpd.scot.nhs.uk/Property.htm>

Yours sincerely,



Mike Baxter
Deputy Director



NHSScotland
Waste Management Action Plan
2013 – 2016

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Disclaimer

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Executive summary

The Waste Management in Scotland Action Plan 2013-2016 builds on previous action plans (dated 2002 and 2007). This Action Plan supersedes all previous versions.

This Action Plan recognises that progress has been made on the previous Action Plans and highlights what should be in place already from.

In drafting the Action Plan 2013, the Health Facilities Scotland (HFS) Waste Management Steering Group (WMSG) considered the actions required to meet best practice and regulatory requirements facing NHS Bodies, looking specifically at the period 2013 – 2016. The key challenge facing NHS Bodies is compliance with The Waste (Scotland) Regulations 2012. These Regulations require that:

- businesses (including hospitals) to present dry recyclable materials (glass, metals, plastics, paper, and card/cardboard) for collection from 1 January 2014;
- materials collected separately for recycling to be banned from going to landfill or incineration from 1 January 2014;
- waste producers involved in food manufacture, preparation, or retail are to separate food waste for recycling from 1 January 2014, unless they are a hospital or they produce less than 50kg of food waste per week, in which case they have until 1 January 2016 to comply;
- food waste disposal to be banned from entering the public drain or sewer from 1 January 2016; and
- biodegradable municipal waste to be banned from going to landfill, from 1 January 2021.

In order to meet these requirements Boards, and specifically their Waste Management Officers (WMOs), need to ensure that appropriate segregation systems and management contracts are put in place. This Action Plan highlights the key steps that need to be undertaken to ensure compliance with the requirements.

Background

This Action Plan draws on the requirements of the previous actions plans (dated 2002 and 2007). The previous action plans referenced the recommendations made by Audit Scotland in their 2001 Baseline Report: 'Waste Management in Scottish Hospitals' and the associated follow-up report published in 2005. This Action Plan acknowledges the progress that has been made and where appropriate highlights what should be in place already from the previous action plans and recommendations of Audit Scotland. This Action Plan supersedes all previous versions.

In drafting the Action Plan 2013, the Health Facilities Scotland (HFS) Waste Management Steering Group (WMSG) considered the actions required to meet best practice and regulatory requirements facing NHS Bodies, looking specifically at the period 2013 – 2016.

The NHSScotland Waste Management Steering Group

The WMSG comprises representatives from NHSScotland Boards, Scottish Government, regulatory bodies (Scottish Environment Protection Agency) and support organisations such as Resource Efficient Scotland/Zero Waste Scotland. Individual Boards are welcome to attend but they are represented by the Regional Chairs, who are nominated by their peers to represent their interests on a geographical basis. There are five regions: Greater Glasgow & Clyde; North of Scotland (including Highlands and Islands); East of Scotland; West of Scotland, and Borders, as shown in the map below.



The WMSG has prepared this Action Plan to assist NHS Boards meet their obligations. It also aims to improve practice through identifying options for greater efficiency and, where possible, gaining value from the services in place and reducing costs where possible.

Scottish Healthcare Technical Note 3: waste management guidance

Scottish Healthcare Technical Note 3: Waste Management (SHTN3) provides comprehensive guidance on all aspects of waste management from development of policies and procedures through to segregation and waste audits. To support this Action Plan 2013-2016, SHTN3 is currently being updated. The revised guidance will be available for download from the HFS web site by mid-2013.

Regulatory requirements

The majority of regulatory requirements relating to waste management apply as soon as the waste is generated and, in order to comply fully, Boards need to have plans, procedures and contracts in place to deal with all waste types before these wastes are generated.

The Waste (Scotland) Regulations 2012

[The Waste \(Scotland\) Regulations 2012](#)¹ introduce new requirements which NHS Boards will have to comply with. The Regulations came into force on 17th May 2012. The Regulations provide the regulatory framework to enable Scotland to meet its Zero Waste Plan, and place requirements on all NHSScotland Boards.

Scotland's Zero Waste Plan was published in June 2012 and sets out the Scottish Government's vision for a zero waste society.

The Plan is comprehensive and includes a number of measures to reduce waste and gain maximum value, including:

- waste prevention programmes for all waste types;
- landfill bans for specific wastes;
- separate collections of recyclables and food wastes;
- challenging targets for recycling of 70% of all waste types with a maximum of 5% permitted in landfill by 2025; and
- restrictions on the use of energy from waste facilities.



The Waste (Scotland) Regulations 2012 provide the timetable for enforcement; some of the key requirements and dates are shown overleaf:

¹ http://www.legislation.gov.uk/ssi/2012/148/pdfs/ssi_20120148_en.pdf

- Businesses (including hospitals²) to present dry recyclable materials (glass, metals, plastics, paper, and card/cardboard) for collection from 1 January 2014
- materials collected separately for recycling to be banned from going to landfill or incineration from 1 January 2014;
- waste producers involved in food manufacture, preparation, or retail are to separate food waste for recycling from 1 January 2014, unless they are a hospital or they produce less than 50kg of food waste per week, in which case they have until 1 January 2016 to comply;
- food waste disposal to be banned from entering the public drain or sewer from 1 January 2016; and
- biodegradable municipal waste to be banned from going to landfill, from 1 January 2021.

The Scottish Government 2012 guidance: 'Duty of Care – A Code of Practice' provides useful information that may assist Boards in meeting the new Regulatory requirements, including an explanation of the 'waste hierarchy', a useful tool for management all waste and in particular the residual waste stream that remains once source-segregated materials have been removed. Importantly, the guidance also explains the 'rurality' exemptions in place with respect to food waste in the 2012 Regulations. Sites classified as being in rural areas are not required to segregate food waste at source (although they can choose to), but are still required to segregate recyclable materials. Additional guidance and useful tools, including a postcode checker for food waste-exempt rural areas, can be found on the Resource Efficient Scotland/Zero Waste Scotland web site: www.zerowastescotland.org

In order to prepare for and meet these requirements, NHS Boards will need to take immediate action. This Action Plan identifies what needs to be done and provides Gantt charts showing the key actions and suggested timescales required to meet the 1st January 2014 and 1st January 2016 deadlines.

Actions that should be in place already

The 2002 and 2007 Action Plans provided a framework in which NHS Boards should manage their waste, by identifying responsible members of staff and by producing clear plans and procedures.

Table 1 overleaf identifies the requirements that NHS Boards should have in place already. Boards that do not have all these requirements in place should treat them as priority actions and put appropriate measures in place immediately to address any gaps.

² Hospitals, as defined in section 108 of the National Health (Scotland) Act 1978(b). For purposes of clarity and practicality, "hospital" means - a) any institution for the reception and treatment of persons suffering from illness, (b) any maternity home, and (c) any institution for the reception and treatment of persons during convalescence or persons requiring medical rehabilitation, and any institution for providing dental treatment maintained in connection with a dental school, and includes clinics, dispensaries, and out-patient departments maintained in connection with any such home or institution, and "hospital accommodation" shall be construed accordingly.

	Requirement/action	Broader description of requirement/action
1.	Board Waste Management Policy.	NHS Boards to review all waste policies and create a single overarching policy which identifies all waste types produced by sites, the Boards commitments with respect to waste and identifies those that are responsible for managing and monitoring waste at each site. The policy should clear identify either Board based or site based Waste Management Officers and clearly defines their role.
2.	Boards to appoint a Waste Management Officer (WMO).	NHS Boards to appoint either Board-based or site-based Waste Management Officers (WMOs). WMOs are responsible for coordinating and collating waste management activity on site(s). Additionally, WMOs are responsible for their Board's timely provision of waste performance data to meet reporting requirements, and effective communication with their respective regional contract consortia chair, and HFS WMSG.
3.	Boards to ensure robust waste training is place, including induction and refresher training.	NHS Boards should have in place a number of waste training packages suitable for general induction training, role specific training and refresher training. 'Train the trainer' packages on non-clinical waste management and catering waste have been developed by Resource Efficient Scotland/Zero Waste Scotland. These are available to Boards via HFS.
4.	Staff to attend induction and annual refresher training.	NHS Boards should provide induction training to all staff members prior to starting their job. Once in post annual refresher training should be provided. Boards should maintain records of staff training.
5.	Annual review and update of Waste Management Policy and Procedural documents.	NHS Board policies and procedures relating to the management of all types of waste should be reviewed regularly, at least on an annual basis. The review should be undertaken by the WMO and should reflect any regulatory or best practice changes as well as considering if changes in current practice (including packaging and movement of waste) could lead to improved efficiencies.
6.	Boards to ensure that clinical waste is secured from public areas.	This requirement was originally identified by Audit Scotland. The HFS Waste Management Steering Group (WMSG) advice is that where possible waste should be removed and secured from public access. However, the WMSG acknowledges that is not always possible as patients and relatives are members of the public and they need to access healthcare areas. The WMSG recommends that potential contact should be minimised through use of clear signage.
7.	HFS to work with National Procurement to aid waste minimisation.	NP, HFS and Commissioning Services need to explore priority requirements as part of NSS' new combined Procurement, Commissioning and Facilities Strategic Business Unit

Table 1: Waste management requirements which should be already in place (e.g. from WMAP 2007, CEL 2 2012, etc.).

	Requirement/action	Broader description of requirement/action
8.	Boards to audit their sites using audit methodology template developed by HFS, or equivalent.	An audit template was developed by HFS and is included in SHTN3 ready for Boards to use. NHS Boards should be using the template or an equivalent to audit their sites. All areas of the sites should be audited; the frequency of audits depends on the nature of the wastes generated and the level of segregation required. Areas producing hazardous waste (including clinical waste) and those where multiple waste streams are segregated at source should be audited more frequently.
9.	HFS to provide policy updates.	HFS, via the WMSG Regional healthcare waste contract Consortia Chairs, provides updates to NHS Boards. In order to implement the updates it is important that WMOs communicate regularly with their Regional Chair.
10.	WMO to verify waste management data in eMART returns.	The WMO is responsible for ensuring that their Board's waste performance data are entered (quarterly) into eMART accurately and on time, reflecting practice within all Board sites. Currently, for NHSScotland benchmarking purposes, Boards are required to submit quarterly data returns to eMART. Data submission deadlines are up to 6 weeks in arrears for quarters 1 to 3, with up to 10 weeks in arrears for Q4 to allow for final invoices and proofing and sign-off of the overall final annual data return.
11.	HFS to provide Boards with reports comparing waste related performance. Boards (WMO) to compare the performance of their sites with others.	HFS makes eMART data available to WMOs for comparison. The Chair of the WMSG produces a summary report annually which identifies trends in the eMART data provided. Performance is reported to Strategic Facilities Group and other levels as necessary.

Table 1 continued: Waste management requirements which should be already in place (e.g. from WMAP 2007, CEL 2 2012, etc.).

2013-2016 Action Plan requirements

This section shows the new requirements to assist Boards in complying with the Waste (Scotland) Regulations 2012 and will enable NHSScotland to contribute towards Scotland's Zero Waste Plan objectives. These are shown below in [Table 2](#).

	Requirement/action	Broader description of requirement/action
12.	SHTN 3 updated (2013) to inform Boards of their new duties and obligations to reflect the Waste (Scotland) Regulations 2012.	HFS to review and update SHTN 3, to include updating operational procedures, compliance, clarification of the Duty of Care obligations, performance and risk management requirements, and include competency recommendations and capacity development to support WMO(s).
13.	Board Waste Minimisation Policy.	NHS Boards to review all waste-related procedures and create a single overarching policy covering minimisation of waste at source, and re-use and recovery of materials. This policy should apply to all sites where healthcare services are delivered. The Policy should clearly identify Waste Management Officers (either Board based or location based), their role and authority. The policy should clarify the Board's expectations and requirements on what the WMO will be accountable for. This policy should replace the policy identified as action 1 in Table 1 (which should already be in place).
14.	Boards to review their waste training packages to ensure they remain fit for purpose and accommodate new requirements.	NHS Boards should already have robust waste training in place (see action 3 of Table 1 - what should already be in place). The Board should periodically review all waste related training materials (no less than annually) to ensure they meet the necessary regulatory and best practice requirements. Training should reflect site based arrangements for segregation and should include information about the Board's waste minimisation and other policies. A number of training packages should be available including general induction training, role specific training and refresher training. To support existing training packages Resource Efficient Scotland/Zero Waste Scotland and HFS have developed a series of slides and support notes which will be available to Boards from HFS.
15.	NHS Boards (via WMO) to audit sites and identify opportunities to source segregate recyclates.	The Waste (Scotland) Regulations 2012 require the segregation of recyclates at source. Items may be segregated by material type e.g. plastics; paper; card; or as dry mixed recyclates (DMR), e.g. cans and plastics; where the clean, dry materials are collected together. Glass should always be segregated and collected separately, as broken glass will contaminate other recyclates. It is important in a healthcare environment that segregation systems meet infection control requirements. To work effectively, and result in minimum contamination, liquids (including water) and food should not be allowed to contaminate recyclates. The level and type of segregation will vary in different areas within a site; an audit of a site will enable the WMO to ascertain the types of materials produced in each area; the space requirements, and the internal logistics requirements to move the materials to waste yards awaiting collection. As part of the audit the WMO should identify areas where additional receptacles (bins) will be required to aid in the segregation of recyclates. Where possible the WMO should aim to utilise existing receptacles as much as possible but Boards may have to purchase or lease additional receptacles. Assessing and confirming bin requirements is an urgent priority for all Boards. A tool to assist this calculation, and other support, is available from Resource Efficient Scotland/Zero Waste Scotland.

Table 2: The new requirements in the Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action
16.	WMO to clarify options for recyclates with waste contractors, and discuss and develop the necessary contract specifications and arrangements.	<p>The WMO should have preliminary discussions with waste contractors to understand the locality based options for managing segregated recyclates. Waste management contractors will be able to provide information about recycling options and material commodity values in the local area and if revenue can be gained from the separation of single material streams, office paper, plastics, etc. The WMO should discuss tolerance levels of contamination, as different recycling options may have different tolerances. As segregation will take place in areas accessible by the public, it is likely that some contamination will always occur, e.g. incorrect items placed in a receptacle for recyclates.</p> <p>The WMO may want to share information from their site audits and provide waste contractor(s) with baseline information. Using this information the waste contractor may be able to offer alternative ways of collection and transportation on site, and to provide (internal and external) collection receptacles (bins) as an integral part of the specified contract.</p>
17.	WMO to ensure production of a plan for each Board site.	<p>These site plans should include options for source separation of recyclates, the additional expenditure required and the income generated. The plans should detail the proposed approach to complying with the 1st January 2014 deadline for segregation of recyclates at source. The plan should include any capital and/or reoccurring expenditure and material commodity income identified, including additional staff training and site based 'waste campaigns' and awareness programmes. If new or alternative internal and external receptacles (bins) for recyclate are required these should be highlighted in the plan along with associated lease or purchase costs.</p>
18.	NHS Boards must add the risk of potential non-compliance to the Board Risk Register.	<p>Following Board Risk Register procedures, aspects of non-compliance of the 2012 Regulations must be entered and tracked with appropriate mitigations as per Board's risk management process and Environmental Management System, e.g. Corporate Greencode.</p>
19	HFS WMSG to review and develop accordingly the scope of eMART to bring in priority recyclates.	<p>Priority recyclates include (but are not limited to): furniture, textiles and construction waste. In order to compile this information the WMO will need to work other managers on site.</p>
20.	NHS Boards must use the appropriate colour coding scheme for source segregated recyclates (as detailed in SHTN3).	<p>To avoid conflict or confusion, and to ensure consistency across NHS Scotland, NHS Boards should use appropriate risk-based colour coding for safely identifying recyclate streams. A copy of the approved colour coding schemes can be found in Appendix 1 (and in SHTN 3).</p>
21.	WMO to ensure provision of training for all staff and awareness campaign.	<p>Boards should put in place an awareness campaign to highlight the new segregation requirements to staff and visitors on site. Boards should look to work with Resource Efficient Scotland/Zero Waste Scotland and other partners to ensure consistency of local approaches so they are clear for staff, the public, etc. Tools and information are available from HFS, and other partners.</p>

Table 2 continued: The new requirements in the Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action
22.	WMO to ensure that recyclates are source segregated by 1 st January 2014.	Boards are required to have fully operational source segregation systems in place for recyclates (card, paper, glass, plastics and cans) by 1 st January 2014, either in separate individual streams or as mixed dry recyclates (NB glass should always be separate). Progress with compliance and non-compliance to be regularly reported by updating the Board Risk Register, and through eMART/the benchmarking process.
23.	WMO to undertake 'snap shot' audits of recycle separation.	Once source segregation systems are operational, the WMO should undertake 'snap shot' audits to verify that segregation is taking place and to monitor the level of contamination of recyclates that is occurring. Different contractors will have different tolerance levels for contamination; the WMO should ensure via 'snap shot' audits that the level of contamination meets their contractor's requirements to ensure that the materials being segregated remain of sufficient quality for recycling. Often food will contaminate recyclates. Audit results can help identify where additional food waste segregation can help increase the quality of recyclates.
24.	WMO to audit food (and associated organic) waste management on sites(s).	WMO to audit site(s) and establish the amount (kg / litres) of food waste being produced and production points, e.g. ward-based, central kitchen, satellite kitchens, etc. Whilst the 2012 Regulations require the segregation and separate treatment of food waste, NHS Bodies may find other organic waste streams suitable for treatment and recovery.
25.	WMO to identify options available for managing food waste (and other organic waste, where appropriate) in their local geographic area.	WMO to identify what options are available for managing food waste (and other organic waste, where appropriate). This will involve discussions with local waste contractors, Local Authorities and support organisations such as Resource Efficient Scotland/Zero Waste Scotland.
26.	WMO to undertake options appraisal for each site(s) with respect to food waste management (and other organic waste, where appropriate).	WMO to assess and identify the most suitable option(s) for site(s) and to put forward a business case outlining any capital and/or reoccurring expenditure required. The business case should include the cost of additional internal and external receptacles (bins) and staff time as well as a project timeline for completion. It should be noted that many solutions require the installation of large-scale equipment (tanks, etc...) and/or construction of treatment facilities and therefore the lead time for having a solution in place can be several months or longer.
27.	WMO to prepare site based implementation plan for food waste management.	WMO to prepare a plan, including a timetable, for implementation of food waste management on site (and other organic waste, where appropriate). The plan should include the operational changes required and associated staff training requirements.
28.	Boards to ensure food waste plan fully operational 2016.	Boards are required to have fully operational food waste management systems in place by 1 st January 2016. This plan should include other organic waste, where appropriate.

Table 2 continued: The new requirements in the Waste Management Action Plan 2013-2016.

A summary of all requirements, and suggested timescales from both [Table 1](#) and [Table 2](#), are shown in the following Gantt Chart.

	Already in place	2013												2014												2015												2016																			
		Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan																								
What should already be in place (from Table 1)																																																									
1	Board Waste Management Policy	█	█																																																						
2	Boards to appoint WMO																																																								
3	Board to ensure robust training is in place	█	█																																																						
4	Staff to attend induction and refresher training	█	█																																																						
5	Annual review of waste policy and procedures	█	█																																																						
6	Boards to ensure clinical waste is secure from public areas	█	█																																																						
7	HFS to work with NP to aid waste minimisation	█	█																																																						
8	Boards to audit their sites using audit methodology template	█	█																																																						
9	HFS to provide policy updates	█	█																																																						
10	WMO to check and verify waste returns in eMART	█	█																																																						
11	HFS to provide Boards with reports comparing waste performance	█	█																																																						
New requirements (from Table 2)																																																									
12	SHTN3 to be updated (HFS-WMSG)			█																																																					
13	Board Waste Minimisation Policy (to replace existing policy developed in action 1)			█	█																																																				
14	Boards to review waste training packages			█	█																																																				
15	WMO to assess bin requirements to identify opportunities to source segregate recyclates			█	█																																																				
16	WMO to discuss options for recyclates with waste contractors			█	█																																																				
17	WMO to produce plan for source segregating recyclates outlining options and associated expenditure			█	█																																																				
18	Risk of non compliance with waste regulations to be added to Board Risk Register			█	█																																																				
19	HFS WMSG to review and develop eMART for priority recyclates (incl. furniture, etc.)			█	█																																																				
20	NHS Boards to use appropriate colour coding for recyclates (e.g. RotG, or pan-Scotland)				█	█																																																			
21	WMO to provide training for all staff and awareness campaign				█	█	█	█																																																	
22	WMO to ensure that recyclates are source segregated by 1st January 2014								█	█																																															
23	WMO to undertake 'snap-shot' audits of recyclate separation									█	█																																														
FOR ACTION IN 2014/15 (by 1 Jan 2016 separate food waste collection/macerated 'food to drain/sewer ban' deadline)																																																									
24	WMO to audit management of food and other organic wastes on sites(s)												█	█																																											
25	WMO to identify options available for managing food waste in their local geographic area												█	█																																											
26	WMO to undertake options appraisal for each site(s) with respect to food waste management												█	█																																											
27	WMO to prepare site based implementation plan for food waste management																																																								
28	Boards to ensure food waste plan fully operational 2016																																																								

Summary of all requirements

Appendix 1: pan-Scotland colour-coding for recyclates

Material	Colour	Pantone Colour Code
Mixed recyclables	Light green	376 C
Paper	Azure blue	300 C
Cardboard	Azure blue	300 C
Metals	Grey	431 C
Plastics	Warm red	Warm Red C
Glass	Dark aqua	3272 C
Food & Organic waste	Bright green	354 C
Residual waste	Black	Black C

Recycle for Scotland colour-coding scheme

Material	Colour	Pantone Colour Code
Mixed recyclables	Dark green	349 C
Source segregated dry recyclables (including cans, plastics, glass and cardboard)	Light green	376 C
Paper	White	-
Food & Organic waste	Brown	4635 C
Residual waste	Black	Black C

Alternative NHSScotland colour-coding scheme

NHSScotland
Waste Management Action Plan 2013-16
Board Audit Template:
Review of Practices and Assessment of Needs

Introduction


This basic audit template is being issued by Health Facilities Scotland’s Waste Management Steering Group (WMSG) to enable all NHSScotland Health Boards to identify at a glance, and track their progress on, the key waste management actions that should already be in place or that still need to be addressed, having arisen from past or recent policy, audit or legislative requirements.

It is intended to be a tool to be used locally by all Boards to enable them to identify progress and gaps on the key priorities. Hence, it is intended to be a useful aide memoire to be used internally. However, although at this point it is not mandatory to return the audit results to Scottish Government, it would be helpful if Boards wished to return a copy of their completed audit to the WMSG in order for HFS and other key partners to be able to identify which Boards may need additional support, and in which specific areas. This may assist greatly any resource allocation and future support priorities.

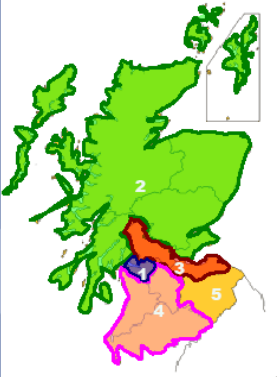
Boards should regularly audit and update their overall progress on the WMAP actions below, ideally at least once per year. HFS will be attending to the actions it is directly responsible for, and any relevant updates arising will be issued to the service, usually via the WMSG or direct to Waste Management Officers in Boards, or where necessary, via the HFS Strategic Facilities Group/Directors of Estates/Facilities.

Completed audits can be returned via your Regional Healthcare Waste Contract Consortia Chair (see below), or direct to dflint@nhs.net.

HEALTHCARE WASTE - NHSScotland



Regional arrangements for healthcare waste contracts, incl. current contract consortium chairs:



1. Greater Glasgow & Clyde - John Green
2. North - John Burnside
3. East - Karen Oates
4. West - Andrew Elliot
5. Borders - David McLuckie

(as at June 2013)

NHS Board: (Add Board Name here) _____ Date: _____

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks ³
1.	Board Waste Management Policy.	NHS Boards to review all waste policies and create a single overarching policy which identifies all waste types produced by sites, the Boards commitments with respect to waste and identifies those that are responsible for managing and monitoring waste at each site. The policy should clearly identify either Board based or site based Waste Management Officers and clearly defines their role.	
2.	Boards to appoint a Waste Management Officer (WMO).	NHS Boards to appoint either Board-based or site-based Waste Management Officers (WMOs). WMOs are responsible for coordinating and collating waste management activity on site(s). Additionally, WMOs are responsible for their Board's timely provision of waste performance data to meet reporting requirements, and effective communication with their respective regional contract consortia chair, and HFS WMSG.	
3.	Boards to ensure robust waste training is in place, including induction and refresher training.	NHS Boards should have in place a number of waste training packages suitable for general induction training, role specific training and refresher training. ‘Train the trainer’ packages on non-clinical waste management and catering waste have been developed by Resource Efficient Scotland/Zero Waste Scotland. These are available to Boards via HFS.	
4.	Staff to attend induction and annual refresher training.	NHS Boards should provide induction training to all staff members prior to starting their job. Once in post annual refresher training should be provided. Boards should maintain records of staff training.	

Table 1: Waste management requirements which should be already in place (e.g. from WMAP 2007, CEL 2 2012, etc.).

³ For status update, please indicate date actions completed, or indicate when they are planned for completion, and who is responsible, so that these can be communicated effectively within the Board.

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
5.	Annual review and update of Waste Management Policy and procedural documents.	NHS Board policies and procedures relating to the management of all types of waste should be reviewed regularly, at least on an annual basis. The review should be undertaken by the WMO and should reflect any regulatory or best practice changes as well as considering if changes in current practice (including packaging and movement of waste) could lead to improved efficiencies.	
6.	Boards to ensure that clinical waste is secured from public areas.	This requirement was originally identified by Audit Scotland. The HFS Waste Management Steering Group (WMSG) advice is that where possible waste should be removed and secured from public access. However, the WMSG acknowledges that is not always possible as patients and relatives are members of the public and they need to access healthcare areas. The WMSG recommends that potential contact should be minimised through use of clear signage.	
7.	HFS to work with National Procurement to aid waste minimisation.	NP, HFS and Commissioning Services need to explore priority requirements as part of NSS' new combined Procurement, Commissioning and Facilities Strategic Business Unit.	
8.	Boards to audit their sites using audit methodology template developed by HFS, or equivalent.	An audit template was developed by HFS and is included in SHTN3 ready for Boards to use. NHS Boards should be using the template or an equivalent to audit their sites. All areas of the sites should be audited; the frequency of audits depends on the nature of the wastes generated and the level of segregation required. Areas producing hazardous waste (including clinical waste) and those where multiple waste streams are segregated at source should be audited more frequently.	

Table 1 continued: Waste management requirements which should be already in place (e.g. from WMAP 2007, CEL 2 2012, etc.).

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
9.	HFS to provide policy updates.	HFS, via the WMSG regional healthcare waste contract Consortia Chairs, provides updates to NHS Boards. In order to implement the updates it is important that WMOs communicate regularly with their Regional Chair.	
10.	WMO to verify waste management data in eMART returns.	The WMO is responsible for ensuring that their Board's waste performance data are entered (quarterly) into eMART accurately and on time, reflecting practice within all Board sites. Currently, for NHSScotland benchmarking purposes, Boards are required to submit quarterly data returns to eMART. Data submission deadlines are up to 6 weeks in arrears for quarters 1 to 3, with up to 10 weeks in arrears for Q4 to allow for final invoices and proofing and sign-off of the overall final annual data return.	
11.	HFS to provide Boards with reports comparing waste related performance. Boards (WMO) to compare the performance of their sites with others.	HFS makes eMART data available to WMOs for comparison. The Chair of the WMSG produces a summary report annually which identifies trends in the eMART data provided. Performance is reported to Strategic Facilities Group and other levels as necessary.	

Table 1 continued: Waste management requirements which should be already in place (e.g. from WMAP 2007, CEL 2 2012, etc.).

2013-2016 Action Plan requirements

This section shows the new requirements to assist Boards in complying with the Waste (Scotland) Regulations 2012 and will enable NHSScotland to contribute towards Scotland's Zero Waste Plan objectives. These are shown below in [Table 2](#).

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
12.	SHTN 3 updated (2013) to inform Boards of their new duties and obligations to reflect the Waste (Scotland) Regulations 2012.	HFS to review and update SHTN 3, to include updating operational procedures, compliance, clarification of the Duty of Care obligations, performance and risk management requirements, and include competency recommendations and capacity development to support WMO(s).	
13.	Board Waste Minimisation Policy.	NHS Boards to review all waste-related procedures and create a single overarching policy covering minimisation of waste at source, and re-use and recovery of materials. This policy should apply to all sites where healthcare services are delivered. The Policy should clearly identify Waste Management Officers (either Board based or location based), their role and authority. The policy should clarify the Board's expectations and requirements on what the WMO will be accountable for. This policy should replace the policy identified as action 1 in Table 1 (which should already be in place).	
14.	Boards to review their waste training packages to ensure they remain fit for purpose and accommodate new requirements.	NHS Boards should already have robust waste training in place (see action 3 of Table 1 - what should already be in place). The Board should periodically review all waste related training materials (no less than annually) to ensure they meet the necessary regulatory and best practice requirements. Training should reflect site based arrangements for segregation and should include information about the Board's waste minimisation and other policies. A number of training packages should be available including general induction training, role specific training and refresher training. To support existing training packages Resource Efficient Scotland/Zero Waste Scotland and HFS have developed a series of slides and support notes which will be available to Boards from HFS.	

Table 2: The New Requirements in Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
15.	NHS Boards (via WMO) to audit sites and identify opportunities to source segregate recyclates.	<p>The Waste (Scotland) Regulations 2012 require the segregation of recyclates at source. Items may be segregated by material type e.g. plastics; paper; card; or as dry mixed recyclates (DMR), e.g. cans and plastics; where the clean, dry materials are collected together. Glass should always be segregated and collected separately, as broken glass will contaminate other recyclates.</p> <p>It is important in a healthcare environment that segregation systems meet infection control requirements. To work effectively, and result in minimum contamination, liquids (including water) and food should not be allowed to contaminate recyclates.</p> <p>The level and type of segregation will vary in different areas within a site; an audit of a site will enable the WMO to ascertain the types of materials produced in each area; the space requirements, and the internal logistics requirements to move the materials to waste yards awaiting collection. As part of the audit the WMO should identify areas where additional receptacles (bins) will be required to aid in the segregation of recyclates. Where possible the WMO should aim to utilise existing receptacles as much as possible but Boards may have to purchase or lease additional receptacles. Assessing and confirming bin requirements is an urgent priority for all Boards. A tool to assist this calculation, and other support, is available from Resource Efficient Scotland/Zero Waste Scotland.</p>	

Table 2 continued: The New Requirements in Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
16.	WMO to clarify options for recyclates with waste contractors, and discuss and develop the necessary contract specifications and arrangements.	<p>The WMO should have preliminary discussions with waste contractors to understand the locality based options for managing segregated recyclates. Waste management contractors will be able to provide information about recycling options and material commodity values in the local area and if revenue can be gained from the separation of single material streams, office paper, plastics, etc. The WMO should discuss tolerance levels of contamination, as different recycling options may have different tolerances. As segregation will take place in areas accessible by the public, it is likely that some contamination will always occur, e.g. incorrect items placed in a receptacle for recyclates.</p> <p>The WMO may want to share information from their site audits and provide waste contractor(s) with baseline information. Using this information the waste contractor may be able to offer alternative ways of collection and transportation on site, and to provide (internal and external) collection receptacles (bins) as an integral part of the specified contract.</p>	
17.	WMO to ensure production of a plan for each Board site.	<p>These site plans should include options for source separation of recyclates, the additional expenditure required and the income generated. The plans should detail the proposed approach to complying with the 1st January 2014 deadline for segregation of recyclates at source. The plan should include any capital and/or reoccurring expenditure and material commodity income identified, including additional staff training and site based 'waste campaigns' and awareness programmes. If new or alternative internal and external receptacles (bins) for recyclate are required these should be highlighted in the plan along with associated lease or purchase costs.</p>	

Table 2 continued: The New Requirements in Waste Management Action Plan 2013-2016

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
18.	NHS Boards must add the risk of potential non-compliance to the Board Risk Register.	Following Board Risk Register procedures, aspects of non-compliance of the 2012 Regulations must be entered and tracked with appropriate mitigations as per Board's risk management process and Environmental Management System, e.g. Corporate Greencode.	
19	HFS WMSG to review and develop accordingly the scope of eMART to bring in priority recyclates.	Priority recyclates include (but are not limited to): furniture, textiles and construction waste. In order to compile this information the WMO will need to work other managers on site.	
20.	NHS Boards must use the appropriate colour coding scheme for source segregated recyclates (as detailed in SHTN 3).	To avoid conflict or confusion, and to ensure consistency across NHS Scotland, NHS Boards should use appropriate risk-based colour coding for safely identifying recycle streams. A copy of the approved colour coding schemes can be found in Appendix 1 (and in SHTN 3).	
21.	WMO to ensure provision of training for all staff and awareness campaign.	Boards should put in place an awareness campaign to highlight the new segregation requirements to staff and visitors on site. Boards should look to work with Resource Efficient Scotland/ Zero Waste Scotland and other partners to ensure consistency of local approaches so they are clear for staff, the public, etc. Tools and information are available from HFS, and other partners.	
22.	WMO to ensure that recyclates are source segregated by 1 st January 2014.	Boards are required to have fully operational source segregation systems in place for recyclates (card, paper, glass, plastics and cans) by 1 st January 2014, either in separate individual streams or as mixed dry recyclates (NB glass should always be separate). Progress with compliance and non-compliance to be regularly reported by updating the Board Risk Register, and through eMART/the benchmarking process.	

Table 2 continued: The New Requirements in Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
23.	WMO to undertake 'snap shot' audits of recyclate separation.	Once source segregation systems are operational, the WMO should undertake 'snap shot' audits to verify that segregation is taking place and to monitor the level of contamination of recyclates that is occurring. Different contractors will have different tolerance levels for contamination; the WMO should ensure via 'snap shot' audits that the level of contamination meets their contractor's requirements to ensure that the materials being segregated remain of sufficient quality for recycling. Often food will contaminate recyclates. Audit results can help identify where additional food waste segregation can help increase the quality of recyclates.	
24.	WMO to audit food (and associated organic) waste management on sites(s).	WMO to audit site(s) and establish the amount (kg / litres) of food waste being produced and production points, e.g. ward-based, central kitchen, satellite kitchens, etc. Whilst the 2012 Regulations require the segregation and separate treatment of food waste, NHS Bodies may find other organic waste streams suitable for treatment and recovery.	
25.	WMO to identify options available for managing food waste (and other organic waste, where appropriate) in their local geographic area.	WMO to identify what options are available for managing food waste (and other organic waste, where appropriate). This will involve discussions with local waste contractors, Local Authorities and support organisations such as Resource Efficient Scotland/Zero Waste Scotland.	
26.	WMO to undertake options appraisal for each site(s) with respect to food waste management (and other organic waste, where appropriate).	WMO to assess and identify the most suitable option(s) for site(s) and to put forward a business case outlining any capital and/or reoccurring expenditure required. The business case should include the cost of additional internal and external receptacles (bins) and staff time as well as a project timeline for completion. It should be noted that many solutions require the installation of large-scale equipment (tanks, etc...) and/or construction of treatment facilities and therefore the lead time for having a solution in place can be several months or longer.	

Table 2 continued: The New Requirements in Waste Management Action Plan 2013-2016.

	Requirement/action	Broader description of requirement/action	Summary of Board status or proposed actions in relation to Action Plan tasks (indicate date completed or planned and lead person responsible)
27.	WMO to prepare site based implementation plan for food waste management.	WMO to prepare a plan, including a timetable, for implementation of food waste management on site (and other organic waste, where appropriate). The plan should include the operational changes required and associated staff training requirements.	
28.	Boards to ensure food waste plan fully operational 2016.	Boards are required to have fully operational food waste management systems in place by 1 st January 2016. This plan should include other organic waste, where appropriate.	

Table 2 continued: The New Requirements in Waste Management Action Plan 2013-2016.

If you choose to return your audit findings to the HFS Waste Management Steering Group (see ‘introduction’ section on page 2), please advise what further support you require and/or if you would like a follow-up call from Zero Waste Scotland’s Healthcare Sector Specialist.

Please include any relevant details below, and add additional pages as necessary:

	Waste topic requiring further support	Follow-up call from Zero Waste Scotland needed (yes/no)	Any further relevant details (including Board name; site/staff contact details, etc.)
1.			
2.			
3.			
4.			
5.			

Appendix 1: pan-Scotland colour-coding for recyclates

Material	Colour	Pantone Colour Code
Mixed recyclables	Light green	376 C
Paper	Azure blue	300 C
Cardboard	Azure blue	300 C
Metals	Grey	431 C
Plastics	Warm red	Warm Red C
Glass	Dark aqua	3272 C
Food & Organic waste	Bright green	354 C
Residual waste	Black	Black C

Recycle for Scotland colour-coding scheme

Material	Colour	Pantone Colour Code
Mixed recyclables	Dark green	349 C
Source segregated dry recyclables (including cans, plastics, glass and cardboard)	Light green	376 C
Paper	White	-
Food & Organic waste	Brown	4635 C
Residual waste	Black	Black C

Alternative NHSScotland colour-coding scheme