

8 November 2019

Directors of NHS Estates and Facilities  
Assistant/Associate Directors of Estates  
and Facilities  
Via e-mail

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Dear Directors

## **Management of Clinical Waste Across the Healthcare Sector**

I am writing to you as the newly appointed Senior Responsible Officer for clinical waste across the NHS to bring to your attention some rather specific Duty of Care responsibilities behest upon your chief executive as the Senior Officer responsible for your organisation in relation to clinical waste. Waste disposal is a key support service without which hospital services cannot operate.

You will be aware of the focus on the waste sector within health and the wider government and ongoing service disruption we are experiencing more than a year after the first issues were identified.

During this time we have assembled a central national team to support NHS trusts at a local level whilst simultaneously creating a clear and directional strategy for the following 10 years.

Aside from building a national infrastructure and supplier resilience plan, a core part of this work focuses in on the requirements of local action in individual organisations. I have set these out below:

1. Competent Waste Manager; every NHS organisation is to have an appointed competent and qualified manager responsible for their clinical waste;
2. Waste segregation; waste is to be segregated into three core streams as determined in HTM07-01; The Safe Management of Healthcare Waste.

Broadly they are:

- a. Waste destined for high temperature incineration [hazardous];
- b. Waste destined for alternative treatment (e.g. steam sterilisation) [infectious]; and
- c. Waste destined for low temperature domestic incineration [no-hazardous and non-infectious];

*The percentage split of the above three streams should broadly constitute 20% destined for high temperature incineration, 20% destined for alternative treatment and 60% destined for low temperature domestic incineration. Note: no NHS waste should be sent to landfill.*



3. Annual pre-acceptance audits; detailed annual audits required to be carried out, signed off by the organisation and logged with the Environment Agency;
4. Accurate Data and record keeping; organisations are to ensure that accurate records are kept of every consignment; ensuring waste is traced to point of destruction. Accurate volume data is to be kept and reported centrally on an annual basis through the Estates Return Information Collection (ERIC);
5. Remove plastics from high temperature incineration; move toward UK approved reusable containers or non-plastic sharps and pharmaceutical packaging.

Recent analysis has shown that segregation at a local level is poor in a number of organisations; with some organisations sending a majority of their waste to high temperature incineration. My team has been working hard to ensure organisations have complete visibility of their current performance in relation to their segregation positions and I enclose a copy of the full analysis for your viewing.

Aside from the statutory responsibilities placed on you to ensure your waste is segregated correctly, it is worth noting there are considerable cost savings associated with this behaviour. We have calculated that these are upward of £15m a year across the whole sector, so everyone playing their part will have a measureable impact and increase flexibility in incinerator capacity. My team will be looking at how we can drive forward innovation, resilience and minimise costs in the long term working with NHS trusts and suppliers.

I trust you will be fully supportive of the approaches set out in this letter.

The Environment Agency will shortly be writing out to your organisation to advise you that they plan to start inspections of NHS sites from early 2020. They will be looking for compliance in line with the elements set out in this letter. We advise you to ensure your Chief Executive and Boards are aware and to enable your organisations to prepare themselves for these forthcoming visits.

Yours faithfully

A handwritten signature in black ink, appearing to be 'SC', written over a light grey rectangular background.

Simon Corben  
Head of Profession and  
Director of NHS Estates