

# Independent Safety Services Ltd



Transportation Safety  
Healthcare Waste Management  
Dangerous Goods Safety Advisors

## Pre-acceptance Overview

*"At ISSL we pride ourselves in providing a high quality and comprehensive consulting, auditing and training service at cost efficient rates to our clients. As our company name implies, we are totally independent so able to form appropriate opinions and recommendations without any conflict of interest or commercial gain from other commercial entities such as waste contractors, packaging suppliers."*

**Alan Johns,  
MANAGING DIRECTOR,  
ISSL**

### **Pre-acceptance Waste Audits**

ISSL has been conducting pre-acceptance audits on behalf of both waste producers and waste contractors for several years. The format and subsequent report that ISSL has developed for pre-acceptance waste audits has been recognised as meeting the stringent requirements of S5 07 (version 1.1) and Safe Management Healthcare Waste (2012). Furthermore, the structure of the reports allows organisations to easily identify where actions are required and prioritise them accordingly. This has been crucial in the development of action plans in order to address areas of non-compliance in a timely manner.

### **Why do we need to do it?**

All waste producers have a statutory Duty of Care to ensure that the waste they produce, handle, treat, dispose and transport is done so safely. Under the Duty of Care, producers must provide the person who is collecting the waste with the required information to ensure they are authorised to accept and treat the waste. The Duty of care also requires waste producers to provide the waste contractor with information on the quantity of waste, the EWC codes, how it is packed and the constituents and types of waste.

The Environment Agency produced a guide for waste producers and waste contractors to enable them to discharge their legal duties. This document is called Clinical Waste EPR5 07 (version 1.1) and outlines the waste producers' and waste contractors' responsibility for monitoring and controlling waste. It also gives clear audit criteria and the frequency the audits are to be undertaken.

### **Waste Pre-Acceptance – What is it?**

Procedures undertaken prior to the delivery of the waste to the disposal site, to determine the composition of the waste by audit of original waste producer. It provides the waste contractor with information and checks to ensure that their waste treatment facility can safely dispose of the waste and therefore, meet its pre-acceptance criteria.

### **How Frequently do I need to audit my site?**

Frequency of the audit and the information required depends on the volume of clinical waste produced annually and the type of waste producer. The table below gives an indication of the timescales and frequency of audits.

[www.issafe.co.uk](http://www.issafe.co.uk)

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<b>Frequency of Pre-acceptance Audits for Waste Producers</b>			
<b>Producer</b>	<b>Volume of waste</b>	<b>Initial audit to be completed by:</b>	<b>Frequency of audit after initial audit completed</b>
**All healthcare providers	≥ 5 tonnes/annum	November 2011	Initial audit should be of entire hospital/site. Thereafter if results of audit show compliance hospital/site can audit 1/3 of premises including high risk areas on a 12 month rolling regime. If non-compliant whole site will require re-auditing.
<b>Higher Risk Waste Producers</b> Dentists, Vets, Research laboratories	≤ 5 tonnes/annum	March 2012	Audit of entire site. Thereafter audit entire site every 2 years
<b>Lower Risk Waste Producers</b> Other medical practices engaged in general practice consultation and treatment in the field of general and specialised medicine by GP's, medical specialists and surgeons. (SIC 2003 85.12)	≤ 5 tonnes/annum	1 <sup>st</sup> July 2011	Entire site every 5 years
Other medical practices not involving hospitals or practising medical doctors, including paramedical practitioners legally recognised to treat patients. (SIC 2003 85.14)	≤ 5 tonnes/annum	1 <sup>st</sup> July 2012	Entire site every 5 years
Community Pharmacies	≤ 5 tonnes/annum	1 <sup>st</sup> July 2013	Entire site every 5 years
Care Homes nursing or medical	≤ 5 tonnes/annum	1 <sup>st</sup> July 2013	Entire site every 5 years
Any healthcare waste producer not wholly or partially encompassed by the above	≤ 5 tonnes/annum	1 <sup>st</sup> July 2012	Entire site every 5 years

Full details of the timescale and rationale for compliance for undertaking pre-acceptance waste audits can be found on the Environment Agency website:

[http://www.environmentagency.gov.uk/static/documents/Business/Briefing\\_note\\_Oct\\_2010\\_vs\\_6\\_final.pdf](http://www.environmentagency.gov.uk/static/documents/Business/Briefing_note_Oct_2010_vs_6_final.pdf)