

Regulatory Position Statement: The Environmental Monitoring of facilities involved in the treatment of Clinical and Healthcare Waste

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Purpose

This position statement clarifies NIEA's position as to the standards that apply when regulating facilities involved in the treatment of clinical and healthcare wastes with regard to monitoring of pathogenic organisms and efficacy of treatment.

Definition of Clinical Waste/Healthcare Waste

The definition for clinical waste can be found in the The Controlled Waste Regulations (Northern Ireland) 2002:

(a) any waste which consists wholly or partly of human or animal tissue, blood or other body fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, or syringes, needles or other sharp instruments, being waste which unless rendered safe may prove hazardous to any person coming into contact with it; and

(b) any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it;

Healthcare Wastes are those wastes listed in Chapter 18 of the European Waste Catalogue and arise from human and animal healthcare, i.e. from hospitals, GP surgeries, dental surgeries, veterinary surgeries etc. Note that not all healthcare wastes are clinical wastes, e.g. chemicals or medicines.

Background

The Pollution Prevention and Control (PPC) regime was created to prevent or minimise emissions to air, water and soil, as well as waste, from industrial installations, including waste management facilities, with a view to achieving a high level of environmental protection.

A number of guidance documents have been published to support the regime such as the BAT reference docs, prepared by the EU, and Sector Technical Guidance Notes produced for UK operators by the Regulatory bodies (NIEA, SEPA and EA).

The first sector guidance note applicable to the treatment of clinical wastes was as follows;

- IPPC S5.06 - Recovery & Disposal of Hazardous & Non-hazardous Waste, 2004¹

This document has been further supplemented by the following Sector Guidance notes;

- IPPC S5.06 – Supplementary for Clinical Wastes (Appendix 6)²
- EPR 5.07 - Clinical Waste³

How NIEA will conduct monitoring of facilities involved in the treatment of Clinical and Healthcare Waste

EPR 5.07 was introduced to reflect a change in the regulatory framework for England and Wales. Although some elements of this document are not wholly applicable to NIEA's regulatory framework some key elements and requirements, namely annexes 1, 2 and 3, have remained unchanged.

NIEA will implement key elements of IPPC S5.06 and its supplementary guidance notes IPPC S5.06 – Supplementary for Clinical Wastes (Appendix 6) and more latterly EPR 5.07 into Permits where appropriate, relevant and practical.

The requirements contained within annexe1, Site commissioning validation for clinical waste treatment; annexe 2, Routine efficacy monitoring (microbial) and annexe 3, Emissions monitoring and benchmarks of EPR 5.07 have, in principle, remained unchanged from the previous supplementary guidance. As such NIEA's regulatory position in respect to the monitoring of pathogenic organisms and efficacy of treatment in facilities involved in the management of clinical wastes has remain unchanged by the publication of EPR 5.07.

NIEA Position

NIEA will apply the guidance within E P R 5 . 0 7 annexes 1, 2 and 3. Until publication of other further guidance; NIEA regards this document as the most appropriate requirements for monitoring of pathogenic organisms and efficacy of treatment in facilities involved in the management of clinical/healthcare wastes and as such should be referred to by NIEA officers and Operators as BAT.

Enforcement

If an activity is likely to cause pollution or harm to human health, or there is a breach of waste management controls, NIEA will take action in line with our enforcement and prosecution policy⁴.

Further advice

Detailed guidance on regulatory controls can be obtained from the NetRegs⁵ website and NIEA'S⁶ website.

Useful Links:

¹ **IPPC S5.06:** http://www.environment-agency.gov.uk/static/documents/Business/sgn_issue_4_968872.pdf

² **IPPC S5.06 (App 6):** http://www.environment-agency.gov.uk/static/documents/Business/appendix_6_sgn_506_1738716.pdf

³ **EPR 5.07:** [http://www.environment-agency.gov.uk/static/documents/Research/S5_07Consultation_Draft_\(4\).pdf](http://www.environment-agency.gov.uk/static/documents/Research/S5_07Consultation_Draft_(4).pdf)

⁴ **NIEA Enforcement Policy:** http://www.doeni.gov.uk/niea/niea_enforcement_policy.pdf

⁵ **NetRegs:** <http://www.netregs.org.uk/>

⁶ **NIEA Waste:** www.ni-environment.gov.uk/waste-home/authorisation.htm