

GPC guidance note for GP practices on the introduction of the new Hazardous Waste regulations - 16 July 2005

July 2005

New hazardous waste regulations were introduced on 16 July 2005, replacing the Special Waste Regulations produced in 1996.

Introduction

In England and Wales, most practices that produce hazardous waste will be required to be registered with the Environment Agency before hazardous waste is treated, disposed of or removed from the premises. The revised guidelines will streamline the procedures for monitoring movements of hazardous waste, as defined in the revised Hazard Waste List.

Classifying Hazardous Waste

Hazardous waste is defined as waste with one or more properties that are hazardous to health or to the environment. A list of hazardous waste that is likely to be applicable to GP practices in particular is included at [Appendix 1](#). The full List of Wastes Regulations (England) 2004 can be found at:

www.defra.gov.uk/corporate/consult/wastereg-haz/annexb.pdf

On the whole, prescription only medicines will not be classified as hazardous waste, and will now be governed by the Environmental Protection Act (Duty of Care) Regulations 1990. This Act places practices under a duty of care to ensure that waste is disposed of properly however, because prescription only medicines do not fall under the Hazardous Waste Regulations they will not contribute to the weight of hazardous waste described below. Only cytotoxic and cytostatic medicines will be hazardous waste.

Registration of practices for which the new guidelines apply is required by those that produce more than 200kg of hazardous waste per year, including clinical waste. As an indication of how much this equates to, 200kg is approximately:

- 14 lead acid batteries
- 500 fluorescent tubes
- 5 small domestic fridges
- 200 filled 4 litre sharps bins.

Although it is difficult to judge at this stage, we do expect that most practices will produce this amount of hazardous waste in a year. For example, we estimate that a practice with a list size of 10,000 patients will fill five, 4 litre sharp bins a week. Practices are reminded that all hazardous waste must be transported in a licensed vehicle.

Registering with the Environment Agency

Practices responsible for disposing of or removing their own hazardous waste must register with the Environment Agency themselves, even if you are in an area where clinical waste collection is arranged and supported by Primary Care Organisations (PCOs). Section 46 b (ii) of the NHS GMS Premises Cost (England) Directions 2004 states that costs, which relate to the collection and disposal of clinical waste should be refunded by the PCO.

Practices are advised to write to their PCO as soon as possible, notifying them of their intention to register their practice with the Environment Agency and to request reimbursement for the cost in doing so. The PCO should be asked to provide an explanation of how they intend to reimburse the practice within a given time frame, as the time remaining before registration is required is limited.

The cheapest way to register is online and costs £18. This can be done by going to the following link: www.environment-agency.gov.uk/subjects/waste/1019330/1029396/

Registering by telephone costs £23 per premises and can be done by ringing 08708 502858 and asking to make a Hazardous Waste registration. Applications by telephone can be made between 0900 and 1700 hours Monday to Friday excluding Good Friday, Christmas Day, bank holidays or other public holidays. The registration number is provided instantly when you pay by credit/debit card only.

You can register in writing by obtaining a registration form. The form is available either by telephoning 08708 502858 or by downloading the form from www.environment-agency.gov.uk/commondata/acrobat/paper_app_1030944.pdf Send the completed form to the Environment Agency, PO Box 544, Rotherham S60 1BY. The charge for this is £28 per premises.

Once registered, practices will be given a unique registration number.

Some practices within a cluster may be contacted by their waste contractors and offered registration to be completed on their behalf for an extended fee. Practices should not feel obliged to accept this offer and are eligible to apply individually for the cheapest fee. Some practices, especially those within a health centre or with service agreements such as under a Private Finance Initiative (PFI) arrangement, may not be responsible for registration. This responsibility may fall within the remit of the building management under the service charge, which should be confirmed by inspecting the appropriate contract.

Further information can be found at:

The Environment Agency homepage www.environment-agency.gov.uk/?lang=e

Statutory Instrument: The Hazardous Waste (England and Wales) Regulations 2005
www.opsi.gov.uk/si/si2005/20050894.htm#4

Registration www.environment-agency.gov.uk/subjects/waste/1019330/1029396/?lang=e

List of Wastes (England) Regulations (2004)
www.defra.gov.uk/corporate/consult/wastereg-haz/annexb.pdf

Hazardous Waste Regulations – interim guidance on premises notification
www.defra.gov.uk/environment/waste/special/pdf/hwr-notifguidance.pdf

FAQs www.defra.gov.uk/environment/waste/special/pdf/hwr-faq.pdf

Scottish Environment Protection Agency FAQs
www.sepa.org.uk/guidance/waste/amendment_faq.htm

Appendix 1. Condensed list of Hazardous Waste that may be applicable to GP surgeries

14 Waste organic solvents, refrigerants and foam/aerosol propellants (except 07 and 08)

- 14 06 waste organic solvents, refrigerants and foam/aerosol propellants
- 14 06 01* chlorofluorocarbons, HCFC, HFC
- 14 06 02* other halogenated solvents and solvent mixtures
- 14 06 03* other solvents and solvent mixtures
- 14 06 04* sludges or solid wastes containing halogenated solvents
- 14 06 05* sludges or solid wastes containing other solvents

15 Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified

15 01 packaging (including separately collected municipal packaging waste)

- 15 01 01 paper and cardboard packaging
- 15 01 02 plastic packaging
- 15 01 03 wooden packaging
- 15 01 04 metallic packaging
- 15 01 05 composite packaging
- 15 01 06 mixed packaging
- 15 01 07 glass packaging
- 15 01 09 textile packaging
- 15 01 10* packaging containing residues of or contaminated by dangerous substances
- 15 01 11* metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers
- 15 02 absorbents, filter materials, wiping cloths and protective clothing
- 15 02 02* absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances
- 15 02 03 absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02

16 02 wastes from electrical and electronic equipment

- 16 02 09* transformers and capacitors containing PCBs
- 16 02 10* discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
- 16 02 11* discarded equipment containing chlorofluorocarbons, HCFC, HFC
- 16 02 12* discarded equipment containing free asbestos
- 16 02 13* discarded equipment containing hazardous components (2) other than those mentioned in 16 02 09 to 16 02 12

16 03 off-specification batches and unused products

- 16 03 03* inorganic wastes containing dangerous substances
- 16 03 04 inorganic wastes other than those mentioned in 16 03 03
- 16 03 05* organic wastes containing dangerous substances
- 16 03 06 organic wastes other than those mentioned in 16 03 05

16 05 gases in pressure containers and discarded chemicals

- 16 05 04* gases in pressure containers (including halons) containing dangerous substances
- 16 05 05 gases in pressure containers other than those mentioned in 16 05 04
- 16 05 06* laboratory chemicals, consisting of or containing dangerous substances, including mixtures of laboratory chemicals
- 16 05 07* discarded inorganic chemicals consisting of or containing dangerous substances
- 16 05 08* discarded organic chemicals consisting of or containing dangerous substances
- 16 05 09 discarded chemicals other than those mentioned in 16 05 06, 16 05 07 or 16 05 08

16 06 batteries and accumulators

- 16 06 01* lead batteries
- 16 06 02* Ni-Cd batteries
- 16 06 03* mercury-containing batteries
- 16 06 04 alkaline batteries (except 16 06 03)
- 16 06 05 other batteries and accumulators

16 07 wastes from transport tank, storage tank and barrel cleaning (except 05 and 13)

- 16 07 08* wastes containing oil
- 16 07 09* wastes containing other dangerous substances
- 16 07 99 wastes not otherwise specified

16 08 spent catalysts

- 16 08 01 spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
- 16 08 02* spent catalysts containing dangerous transition metals (3) or dangerous transition metal compounds
- 16 08 03 spent catalysts containing transition metals or transition metal compounds not otherwise specified
- 16 08 04 spent fluid catalytic cracking catalysts (except 16 08 07)
- 16 08 05* spent catalysts containing phosphoric acid
- 16 08 06* spent liquids used as catalysts
- 16 08 07* spent catalysts contaminated with dangerous substances

16 09 oxidising substances

- 16 09 01* permanganates, for example potassium permanganate

- 16 09 02* chromates, for example potassium chromate, potassium or sodium dichromate
- 16 09 03* peroxides, for example hydrogen peroxide
- 16 09 04* oxidising substances, not otherwise specified

16 10 aqueous liquid wastes destined for off-site treatment

- 16 10 01* aqueous liquid wastes containing dangerous substances
- 16 10 02 aqueous liquid wastes other than those mentioned in 16 10 01
- 16 10 03* aqueous concentrates containing dangerous substances
- 16 10 04 aqueous concentrates other than those mentioned in 16 10 03

16 11 waste linings and refractories

- 16 11 01* carbon-based linings and refractories from metallurgical processes containing dangerous substances
- 16 11 02 carbon-based linings and refractories from metallurgical processes others than those mentioned in 16 11 01
- 16 11 03* other linings and refractories from metallurgical processes containing dangerous substances
- 16 11 04 other linings and refractories from metallurgical processes other than those mentioned in 16 11 03
- 16 11 05* linings and refractories from non-metallurgical processes containing dangerous substances
- 16 11 06 linings and refractories from non-metallurgical processes others than those mentioned in 16 11 05

18 Wastes from human or animal related health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care)

- 18 01 wastes from natal care, diagnosis, treatment or prevention of disease in humans
- 18 01 01 sharps (except 18 01 03)
- 18 01 02 body parts and organs including blood bags and blood preserves (except 18 01 03)
- 18 01 03* wastes whose collection and disposal is subject to special requirements in order to prevent infection
- 18 01 06* chemicals consisting of or containing dangerous substances
- 18 01 07 chemicals other than those mentioned in 18 01 06
- 18 01 08* cytotoxic and cytostatic medicines
- 18 01 09 medicines other than those mentioned in 18 01 08
- 18 01 10* amalgam waste from dental care

20 Municipal wastes (house waste and similar) Commercial, industrial and institutional wastes) including separately collected fractions)

20 01 separately collected fractions (except 15 01)

- 20 01 01 paper and cardboard
- 20 01 02 glass
- 20 01 08 biodegradable kitchen and canteen waste

- 20 01 10 clothes
- 20 01 11 textiles
- 20 01 13* solvents
- 20 01 14* acids
- 20 01 15* alkalines
- 20 01 17* photochemicals
- 20 01 19* pesticides
- 20 01 21* fluorescent tubes and other mercury-containing waste
- 20 01 23* discarded equipment containing chlorofluorocarbons
- 20 01 25 edible oil and fat
- 20 01 26* oil and fat other than those mentioned in 20 01 25
- 20 01 27* paint, inks, adhesives and resins containing dangerous substances
- 20 01 28 paint, inks, adhesives and resins other than those mentioned in 20 01 27
- 20 01 29* detergents containing dangerous substances
- 20 01 30 detergents other than those mentioned in 20 01 29
- 20 01 31* cytotoxic and cytostatic medicines
- 20 01 32 medicines other than those mentioned in 20 01 31
- 20 01 33* batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
- 20 01 34 batteries and accumulators other than those mentioned in 20 01 33
- 20 01 35* discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)
- 20 01 36 discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35
- 20 01 37* wood containing dangerous substances
- 20 01 38 wood other than that mentioned in 20 01 37
- 20 01 39 plastics
- 20 01 40 metals