



NHS England
Oak House
Moorhead Way
Bramley
Rotherham
S66 1YY

Email: england.syprimarycare@nhs.net

Region/Area: South Yorkshire ICB

Ref: Offensive waste stream implementation

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Dear Colleagues,

Following the introduction of new waste management practices in the form of Anenta Ltd, combined with standardisation of waste contracts, we must now increase compliance with relevant legislative and forthcoming updates to guidance (Health technical memorandum 07-01).

The NHS has discussed the offensive waste stream for several years and previously allowed this implementation to be decided on a site-by-site basis. This is no longer viable, leading to a wider implementation of the offensive waste stream at a national level. This is in line with the NHS waste strategy and net zero targets and will see each healthcare waste producing location increase levels of compliance with the waste hierarchy.

Offensive waste

Offensive waste – clinical and non-clinical healthcare waste that is non-infectious and does not contain pharmaceutical or chemical substances but may be unpleasant to anyone who comes into contact with it.

	Examples	Waste status	Human Healthcare
Healthcare Offensive waste	Outer dressings and protective clothing like masks, gowns and gloves that are not contaminated with bodily fluids, and sterilised laboratory waste	Non-Hazardous	18-01-04
Municipal Offensive waste	Hygiene waste and sanitary protection like nappies and incontinence pads	Non-Hazardous	20-01-99

For the avoidance of doubt, both healthcare and municipal offensive waste can be produced at the same location. As an example, at GP premises sanitary waste would be classified as 20-01-99 and disposed of through the GP's own waste disposal arrangements.

Healthcare offensive waste must be segregated from both infectious clinical and municipal waste. It is anticipated that most healthcare bagged waste can be reclassified as 18-01-04 however there will still remain the need to use orange bags for infectious substances.

How will this change occur?

Anenta Ltd have worked closely with NHSE, IPC, Local Commissioners and industry experts to assess the impact of this waste stream and have together approved a risk assessment that can be used by each waste producing location to inform the rationale for the change. There is a risk of enforcement action by not implementing this waste stream, and there are also positive environmental outcomes through the use of appropriate disposal mechanisms.

You will be able to access all the relevant information, including communications that have been issued, signage, risk assessment, FAQs and more through your Anenta account (www.vector.anenta.com).

What will change?

- Over the coming months Anenta will communicate with you to advise of specific changes. Please ensure you read the communications issued by Anenta.
- You will see reduced quantities of orange bags delivered which will be replaced with the offensive waste bag (tiger bag)
- A full training package has been developed with Health Education England (HEE) to be deployed across primary care which specifically addresses this and other waste related matters. Your commissioner and HEE will be formally launching the training module however you will be able to access the training via your Anenta account.
- Pre-acceptance audits will need to be completed to ensure the success of implementation*

What action should you take?

You should advise all staff of this pending change to the waste streams at your premises. It is envisaged that there will be at least a 60% Offensive to 40% Orange bag change in volume.

****When advised to do so by Anenta, please complete the pre-acceptance audit that Anenta issue to you via your Anenta account. This is the single most important action that you need to complete to ensure your waste continues to be collected. For more detail on why pre-acceptance audits need to be completed again please refer to the FAQ document within your Anenta account.***

When collections occur going forward you need to ensure that you maintain a small stock of orange bags for potentially infectious waste which should be used as a contingency only. All other related healthcare waste should be disposed of via the offensive waste excluding non-contaminated recyclable items. It is important that appropriate segregation management becomes a priority with your practice to reduce the risk of waste contractors ceasing collection for “non-conformance”.

Please seek assistance from Anenta Ltd wherever you need clarification, guidance or support regarding waste management. Be aware that Anenta does not physically collect the waste from your premises, they manage the contracts on behalf of the commissioners to ensure you get what you need.

Primary Care Team

NHS England North East & Yorkshire