

Management of wastes from mass testing in community & care home settings

1. Background

- 1.1 Under SEPA's [Principles for Regulatory Approach to EU Exit and COVID-19](#), SEPA is committed to supporting everyone we regulate during EU Exit and COVID-19 in ways that maintain protection for Scotland's environment.
- 1.2 SEPA expects people to have business continuity arrangements in place to ensure compliance with their SEPA permit or other environmental regulatory requirements during EU Exit and COVID-19. We are clear that we expect everyone we regulate to continue to comply with Scotland's environmental laws. If operators have a specific compliance issue they should contact SEPA to discuss a Temporary Regulatory Position Statement.
- 1.3 SEPA is issuing specific guidance where needed to help everyone we regulate to continue to comply with Scotland's environmental laws. This COVID-19 guidance covers the management of wastes arising from mass testing in community and care home settings. It will be published on [SEPA's COVID-19 hub](#) on our website.

2. SEPA guidance

- 2.1 Following notification of mass testing centres being established for asymptomatic individuals in universities, communities and care homes, SEPA was asked to provide guidance on the appropriate coding, treatment and disposal of the wastes arising from this Lateral Flow Device (LFD) testing process.
- 2.2 LFD testing is a clinically validated self-administered swab antigen test that does not require a laboratory for processing and can turnaround results within an hour at the test location. Waste produced at these sites comprises the plastic cartridge and swab which make up the LFD as well as PPE, general and packaging wastes.
- 2.3 All sites have a waste management 'Duty of Care' and are responsible for undertaking a specific [WM3](#) assessment for the classification of the waste that they will generate (if not identified in appendix 1 or 2). This assessment must be documented, a Duty of Care Waste Transfer Note or Special Waste Consignment Note must be completed before waste is removed from the site and records kept for minimum of 2 years or 3 years respectively.
- 2.4 Please note that if the wastes identified in below (Appendix 1 or 2) are sent to a transfer station to be bulked up, SEPA will not require a WM3 assessment or expect reclassification of the waste prior to dispatch to Energy from Waste unless the composition of the waste has changed.
- 2.5 It is the responsibility of each testing site to identify and classify their wastes appropriately. The chart in Appendix 1 to this document has been produced to assist

in the classification of the wastes most commonly produced at community test centres run by local authorities and universities.

- 2.6 Where mass testing takes place in care homes, the chart detailed in Appendix 2 should be followed. A narrative to accompany Appendix 2 can be found in Appendix 3.
- 2.7 Guidance on the storage, collection, transportation and bulking-up of all mass testing related LFD waste can be found in Appendix 4.
- 2.8 In all cases, whether mass testing is carried out in either a healthcare or non-healthcare setting, the wastes produced from the LFD testing process **must not** be disposed of in the clinical waste (orange bag) stream.
- 2.9 Waste collection should occur as soon as possible. Where there may be delays in establishing the appropriate collection of mass testing wastes – specifically PPE and LFD cartridges and swabs - it is acceptable for testing sites to store these wastes securely until such time as collections can commence. Secure storage means that the wastes must be bagged and kept in a location where the public cannot gain access to them and the wastes themselves cannot spill or escape. Further guidance is provided in Appendix 4.
- 2.10 This guidance applies only in Scotland. *Other guidance may be applicable elsewhere in the UK.*
- 2.11 This guidance may be subject to periodical review and may be varied or withdrawn at any time.

2.12 If you are unable to follow this guidance for any reason please contact SEPA at waste.contingencies@gov.scot

Appendix 1 – EWC Coding Guidelines for Waste Arising from Mass Testing (LFD)



(a) not suitable for orange bags and should be placed in distinct packaging in all settings (for example clear bags). Speak to your contract to arrange suitable measures.

(b) should only be adopted where appropriate i.e. no scope for segregation and/or restricted storage.

Appendix 2 – EWC Coding Guidelines for Waste Arising from Mass Testing (LFD) in Care Homes

| Waste Stream | EWC | Description | Recommended Treatment |
|---|---|---|--|
| General Waste | 20 03 01 | Mixed Municipal/Recycling | MRF, EFW or Landfill |
| All Packaging | 15 01 XX (see WM3 for appropriate six digit EWC code) | Packaging | MRF, EFW Plant or Landfill |
| Swabs/Cartridges/Devices (a) | 20 01 99 | Non-Hazardous liquid chemical waste from testing | EFW Plant |
| PPE (a) | 20 01 99 | Non-Infectious PPE | EFW Plant or Landfill (as a last resort) |
| Single Bag Disposal (exc. General Waste and Packaging (a)(b)) | 20 03 01 | Non-Hazardous liquid chemical contaminated mixed waste from testing | EFW Plant |

(a) not suitable for orange bags and should be placed in distinct packaging in all settings (for example clear bags). Speak to your contract to arrange suitable measures.

(b) should only be adopted where appropriate i.e. no scope for segregation and/or restricted storage.

Appendix 3 – Detailed Coding Guidance for Care Homes

Waste Management Guidance for Care Homes - Lateral Flow Device (LFD) Testing Waste

Where LFD testing is being carried out several distinct waste streams will be produced. Some of these streams contain liquid chemicals and as such they need to be treated via Incineration (Energy from Waste) facilities and must be segregated and managed accordingly as per the tables below.

Waste Types

None of the wastes being produced are considered a clinical waste therefore **must not** be disposed of in an orange bag or treated as infectious clinical waste. Use of an orange bag or classification as infectious clinical waste may lead to the waste being treated inappropriately.

Packaging:

Any packaging relating to the testing kits should be managed via the existing procedure for this waste type. This stream is non-hazardous packaging waste and should be classified, described and treated as follows:

| EWC Code | Description | Preferred Treatment Route |
|---|-----------------|---------------------------|
| 15 01 XX (see WM3 for appropriate 6-digit code) | Packaging Waste | MRF, EFW or Landfill |

Chemically Contaminated Waste

Any swabs, cartridges and devices associated with LFD testing are likely to be contaminated with liquid chemicals. This waste is not considered 'clinical' or 'infectious'. Therefore it must not be placed in an orange bag or disposed of via the clinical waste route.

Due to the liquid chemical content such wastes arising from mass test settings should be treated by Incineration i.e. Energy from Waste. It is necessary for this waste to remain 'visible' in the waste management chain in order to enable it to be easily identified and distinguished from other waste streams and prevent mishandling or inappropriate treatment (for example, landfill). Therefore, ideally it should be placed in distinct packaging, ideally a clear bag.

Where clear bags are not available you should speak to your waste management contractor to agree an appropriate approach to achieve the desired treatment route (i.e. incineration). This stream is non-hazardous chemically contaminated waste and should be classified, described and treated as follows:

| EWC Code | Description | Preferred Treatment Route |
|-----------------|--|----------------------------------|
| 20 01 99 | Non-Hazardous Chemical contaminated waste from LFD testing | Incineration (EFW) |

PPE

Any PPE associated with LFD Testing should be non-infectious and therefore not a clinical waste and must not be placed in an orange bag or disposed of via the clinical waste route. Due to the potentially sensitive/offensive nature of this waste the preferred treatment route is incineration (Energy From Waste). Therefore it is necessary for this waste to remain 'visible' in the waste management chain in order to prevent mishandling or inappropriate treatment and it should be placed in distinct packaging, ideally a clear bag.

Where clear bags are not available you should speak to your waste management contractor to agree an appropriate approach to achieve the desired treatment route (i.e. incineration). This stream is non-infectious PPE waste and should be classified, described and treated as follows:

| EWC Code | Description | Preferred Treatment Route |
|-----------------|--------------------|--|
| 20 01 99 | Non-infectious PPE | Disposal via Incineration (EFW) or landfill as a last resort |

Where there is known risk of infection due to the presence of COVID [HPS guidance](#) should be followed.

Single Bag Disposal (excluding general waste and packaging)

On occasion storage may be limited and segregation may not be possible, where this is the situation, then the wastes can be disposed of in a single bag. However this option should be used only as a last resort.

This stream is not a clinical waste neither is it infectious: therefore it must not be placed in an orange bag or disposed of via the clinical waste route.

Due to the liquid chemical content such wastes arising from mass test settings should be treated by Incineration (Energy from Waste). It is necessary for this waste to remain 'visible' in the waste management chain in order to prevent mishandling or inappropriate treatment (e.g. landfill). Therefore it should be placed in distinct packaging, ideally a clear bag.

Where clear bags are not available you should speak to your waste management contractor to agree an appropriate approach to achieve the desired treatment route (i.e. incineration).

This stream is non-hazardous chemically contaminated waste and should be classified, described and treated as follows:

| EWC Code | Description | Preferred Treatment Route |
|-----------------|--|----------------------------------|
| 20 03 01 | Non-Hazardous Chemical contaminated mixed waste from LFD testing | Incineration (EFW) |

Appendix 4 – Storage, Collection, Transportation and Bulking-up of LFD waste.

Anyone who produces waste or who stores, collects or transports it has an overarching 'Duty of Care' to ensure the waste does not cause harm or pollution, including preventing the escape of the waste during storage, collection and transport. You should follow the measures for the storage, collection, transportation and bulking up of waste arising from mass LFD testing as set out below.

Storage (producer)

Waste collection should occur as soon as possible. Where there may be delays in establishing the appropriate collection and disposal contracts for the mass testing wastes it is acceptable for testing sites to store these wastes securely until such time as collections can commence.

In order to be stored securely it is recommended that:

- Waste should be bagged within such a way to enable it to be easily identified and distinguished from other waste streams, for example clear bags.
- The bags can be bulked up in in containers (e.g. bins). The containers should be leak-proof and clearly labelled so that wastes can be properly segregated and the contents are easily identifiable for the collectors and transporters of the waste.
- While awaiting collection, full containers should be stored in a secure location with access limited to people who you have authorised to do so. If waste is stored in skips or similar containers, ensure that they are lockable to prevent unauthorised access.

Collection & Transportation

When collecting and transporting LFD wastes:

- The waste must be collected and transported by a registered (or exempt) waste carrier.
- At the point of collection from the testing site this waste should not be mixed with other waste streams and, ideally, should be transported as a segregated waste.

- Where segregated transport is not possible, it can be co-collected with other wastes as long as it is not mixed with the other wastes and can be recovered safely without damaging the integrity of the bags/containers and presented as a discrete waste stream at the receiving facility.
- The integrity of the waste packaging should be maintained throughout the collection and transportation phase so vehicle choice is important. The waste should not be mechanically compacted and mechanical blades should only be used to move the waste on the vehicle if container/bag integrity is preserved.
- Vehicles and containers should be suitable for holding the waste so that it does not escape during transport and management.
- Use enclosed vehicles/trailers for bulk transportation of waste. The use of netting or covers is acceptable if it prevents the escape of waste during transport.

When transporting wastes from intermediate storage and bulking up sites to the final Energy Waste Facility you should ensure the waste can be separately deposited at and handled by the receiving facility (i.e. if being transported alongside other wastes destined for the Energy from Waste facility) without damaging the integrity of the bags/containers.

Intermediate Storage and Bulking-up Sites ('transfer stations')

This waste can be bulked up at transfer stations prior to bulk onward transfer to an Energy from Waste facility for final treatment. This waste is not suitable for manual sorting or pre-treatment.

When bulking up and storing LFD waste prior to transfer to final treatment at an Energy from Waste facility you must:

- Make sure you are authorised to accept that waste and do not exceed the quantities of waste you are permitted to manage at any one time. If you are not authorised, or have limited compliant capacity, you should contact SEPA.
- The site should be secure to prevent access to unauthorised persons.

- Store the waste separately from other wastes in a secure location and limit access to authorised site personnel and drivers.
- Clearly label containers or bays to identify the waste types being stored there
- Store the waste undercover to prevent rain infiltration/damage and take steps to prevent the escape of the waste e.g. ensure that any skips, trailers or similar containers used to store waste are covered or netted.
- Store liquid wastes on impermeable surfaces within a secondary containment system in order to prevent liquid wastes and leakages from escaping into drains, watercourses or surrounding ground.

Please note that the recommended treatment route is Energy from Waste (incineration).