

Management of waste arising from Lateral Flow Device testing - Guidance

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.
- 1.4 This guidance note replaces the SEPA COVID-19 guidance 'Management of wastes from mass testing in community & care home settings' and incorporates updated advice from DEFRA and Health Protection Scotland. It will be published on SEPA's [regulatory approach hub](#) on our website

1.5 This guidance note addresses Lateral Flow Device (LFD) waste (both positive and negative results) produced in three settings (See Section 3):

- Mass/Large scale testing
- Community/workplace testing (non-household/non-healthcare settings)
- Households

2. SEPA guidance

2.1 The Lateral Flow Device (LFD) test is a clinically validated self-administered swab antigen test that does not require laboratory processing. Wastes from LFD tests comprise the plastic cartridge and swab (the LFD component) and other associated wastes namely PPE, packaging and general waste.

2.2 LFD testing is carried out on an assumed asymptomatic healthy population not known to be infectious. The reagent that allows the LFD to work contains a non-hazardous chemical in liquid. Both these factors allow for waste from LFD tests to be classified as non-hazardous and SEPA would not expect either factor to lead to an assessment and classification of the waste as hazardous. (Please note however that it is the responsibility of the waste holder to classify their own waste).
Furthermore, the liquid component of the test is not significant enough to prevent LFD waste from being sent to landfill.

2.3 All sites (other than households) where waste is produced have a waste management 'Duty of Care' and are responsible for undertaking an appropriate assessment, and classification, of all the waste that they generate. Where waste is not suspected to have hazardous properties a Duty of Care Waste Transfer Note

must be completed before waste is removed from the site and records must be kept for a minimum of 2 years.

- 2.4 It is the responsibility of each testing site (except households) to identify, classify and manage their wastes appropriately.
- 2.5 Unless an assessment indicates that it poses a risk of infection or is contaminated with a hazardous substance, any waste produced from LFD testing must NOT be disposed of in the clinical waste (orange bag) stream.
- 2.6 This guidance applies only in Scotland. *Other guidance may be applicable elsewhere in the UK.*
- 2.7 This guidance may be subject to periodical review and may be varied or withdrawn at any time.
- 2.8 If you are unable to follow this guidance for any reason please contact us at nationalwaste@sepa.org.uk

3. Guidance on managing LFD waste in particular settings

3.1 Mass/Large scale testing

For the purposes of this guidance document, 'mass/large scale testing' is taken to describe LFD testing undertaken at sites set up solely for that purpose, for example, local authority testing sites.

- 3.2 It is likely that these ‘mass/large scale testing’ sites will produce proportionally higher volumes of LFD waste in comparison to mixed general waste and as such it is more likely to be presented for collection as a segregated waste.
- 3.3 The Waste (Scotland) Regulations 2011 and the Waste Management Licensing (Scotland) Regulations 2011 place a duty on all persons who produce, keep or manage waste, including Local Authorities, to take all reasonable steps to apply the waste hierarchy.
- 3.4 With these duties in mind, the preference would be for LFD wastes, produced as a result of mass/large scale testing to be disposed of via an Energy from Waste (EfW) process however where practical constraints prevent this from being achieved, LFD waste can be mixed with the general waste stream and disposed of to landfill.
- 3.5 SEPA encourages operators of mass testing sites to discuss, and agree, with their waste contractor, a suitable and reasonable approach to managing their LFD waste.

If you have any issues implementing the approach set out in this guidance, please contact SEPA by email at nationalwaste@sepa.org.uk

- 3.6 If you segregate your LFD waste then you should refer table 1 below.

Table 1:

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

Swabs, cartridges and devices	20 01 99	Non-Hazardous waste from LFD testing	EFW (where possible) or Landfill
PPE	20 01 99	Non-infectious PPE	EFW (where possible) or Landfill.

3.7 Where there are delays in establishing the appropriate collection and disposal contracts for the 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.

3.8 **Community testing (non-household)**

Where testing is on a small scale and not at a designated testing setting then the waste from LFD tests can be placed in the residual waste “black bag” waste stream. You should agree this with your waste collector before doing so.

3.9 **Households**

LFD wastes can be placed in the residual waste “black bag” waste stream and put out for normal collection. Do not place LFD wastes in recycling waste streams.