

2023 in Review: HWMA Activity & Engagement

CIWM	
General Engagement	<p>The HWMA continued its ongoing ‘partner’ relationship with CIWM. CIWM is represented at the majority of HWMA meetings and specific collaboration has taken place on certain issues where there is common ground and/or a common desired outcome.</p> <p>CIWM has been leading the creation of the waste training package for Waste Managers within the NHS Trusts; regular updates have been provided to the HWMA on progress with this, and the subsequent roll out.</p>
Defra	
Digital Waste Tracking	<p>Defra issued the consultation outcome (Government Response) to the mandatory digital waste tracking service in 2022. The key points of this were:</p> <ol style="list-style-type: none"> 1. Introduction of a system to make it easier to track waste and resources, enabling users to provide the right information at the right time. 2. Forms part of ‘smarter regulation’ proposal to grow the economy and improve regulation and guidance, ensuring it’s clear and proportionate. 3. Defra is developing the IT service with help from those in the waste industry (via user panel). <p>The HWMA sent a letter to Defra in August 2023. This confirmed our support of the objectives of the system but noted our concerns regarding the current approach to development of it and user testing. The HWMA represents almost all UK businesses involved in the collection, treatment, and disposal of healthcare waste; we requested that this be considered when selecting testers for the system.</p> <p>This opened up a line of communication with Defra, and a meeting (via Teams) took place in November 2023 between the Executive Committee and relevant Defra leads. Defra has since attended our January 2024 general meeting and is happy to continue to engage with us.</p> <p>With Defra’s encouragement, the HWMA set up a specific Working Group in December 2023 to liaise with Defra and to offer site visits for the IT partner when that stage is reached.</p> <p>A copy of the August HWMA letter to Defra is attached, for members.</p>

2023 in Review: HWMA Activity & Engagement

DfT	
ADR	<p>ADR 2023 - Agreement concerning the International Carriage of Dangerous Goods by Road came into force on 1 January 2023 across Europe, with a 6-month transitional period allowed until 31 June 2023. This is enforced by the Department for Transport (DfT).</p> <p>During 2023 the HWMA has been in regular contact with regulatory bodies and stakeholders regarding the possible issue around the need to weigh packages at the site of production. This has been directly with the DfT but also in collaboration with other parties such as NPAG and NHSE.</p>
EA / SEPA / NRW / NIEA	
AT Validation Guide	The HWMA finalised and published its Alternative Treatment Validation Testing Guide in December 2023. This followed a period of consultation with the HWMA Working Group and the UK regulatory bodies.
Consultation on RPS 063 Storing Waste Aerosol Canisters	<p>The HWMA provided feedback on proposed changes to RPS 063, which included the clarification that it is purely for the storage of waste aerosol air freshener canisters, that they can only be stored at washroom service companies' premises, and to include the reduction of the storage limit to 1 m³. The storage limit was initially proposed to be 205 litres, but feedback provided by the HWMA members succeeded in this being increased.</p> <p>The revised RPS was to be implemented pending the completion of the permit review process at which point it would be withdrawn as the codes have been included on the varied bespoke permits and on the SR EP. <i>Note: the EA has been chased by HWMA about this as the 2020 version is still live on the gov.uk website. Note that the EA intention is still to publish the revised version then withdraw it. Anyone without a permit but wishing to store this type of waste will need to address that.</i></p>
Waste Signatures	<p>In collaboration with NPAG, the HWMA produced a letter to the EA, presenting the difficulties in the industry in complying with relevant legislation on signatures being required at the point of waste transfer/consignment.</p> <p>This was sent to the EA in November 2023 (and circulated to all members) and confirmed the HWMA and NPAG view that the EA should adopt a non-enforcement policy for obtaining signatures on consignment notes, provided that the controls offered in our letter are maintained. This is until such time that the current regulatory system is updated by Defra (the Hazardous Waste Regulations, in 2025) when hopefully this can be addressed formally.</p> <p>A copy of the November letter is attached, for members.</p>

2023 in Review: HWMA Activity & Engagement

Waste Segregation in the NHS	HWMA members have regularly flagged up issues with the quality of segregation at the point of waste production. The HWMA's concerns have been documented and shared with the EA. Most specifically, the HWMA members provided a number of examples of poor segregation to the EA, for the EA to use in their presentation to NPAG in December 2023.
Trailer Storage	In collaboration with the ESA, the HWMA sent a letter to the EA in December 2023 setting out its position on the use of trailers at permitted sites. This clarified industry concerns with the current guidelines on the storage of waste in trailers, as defined in the Healthcare Waste: Appropriate Measures Guidance. The HWMA view aligns with that of the ESA which has sent a separate position statement letter to the EA. A copy of the HWMA December letter is attached, for members.
Executive Team	
Elections	At the AGM in July 2023, elections were held for the Executive Team. Voting took place and the team was confirmed as: Clare Noble – Chairperson Stuart Brittle – Treasurer David Williams – Director (Transfer/Transport & Compliance) Maria Mahon – Director (Customer Engagement) James Lee – Director (Consumables)
NHSE	
Estimated Bin Weights	In November, we provided NHSE our collated (and anonymised) information regarding estimated bin weights in use across the industry. This followed up from previous data collection in 2017 and was provided in order to aid NHSE negotiations with the DfT on the weighing of waste at producer sites.
NPAG	
General Engagement	The HWMA continued its ongoing 'partner' relationship with NPAG. NPAG is represented at the majority of HWMA meetings; and there is HWMA representation at many of the NPAG meetings. Specific collaboration has taken place on certain issues where there is common ground and/or a common desired outcome.
Coming up in 2024...	
NHS Waste Awards	The HWMA has agreed to sponsor the NHS Waste Awards, a new award ceremony set up by NHSE. This is planned to be held in Birmingham on 2 October. It is anticipated that the HWMA will sponsor the award for the 'Best Clinical Waste Reduction Trust'.