

Public Health Protection Covid-19

The Waste and Resource Management Sector (hereinafter referred to as “the Sector”) identification of the key risks and the options for mitigation to ensure public health protection is maintained for the duration of the Covid-19 outbreak in Scotland.

In terms of immediate priorities, the following key actions to ensure public health protection is maintained have been identified:

1. A first phase guidance document produced for all front line and material supply chain operators which provides clarity of essential status and clarity for all health & safety considerations for all staff involved in the collection, treatment, storage and disposal of waste.
2. An integrated communication strategy comprising of clear and consistent messaging for both businesses and householders on their roles in ensuring we can provide an effective waste collection service to safeguard public health.
3. A sector wide PPE procurement initiative to bolster and ensure consistency of supplies.
4. A disposal capacity management plan is prepared and actioned to reflect the immediate increases in the production of household waste as the new stringent ‘lock down’ measures take effect.

The Sector in Scotland has identified the following key risks that are, have and will continue to emerge as a direct consequence of the Covid-19 outbreak in Scotland:

- Staff Shortages
- Safe Operation of HWRCs
- The availability of essential PPE to operational staff
- Clarity if there is sufficient EfW and landfill capacity and status of current global recycle, RDF and SRF markets
- Clear guidance required from Health Protection Scotland (HPS) which includes clarity on the viability of the virus in waste and any further measures that will be required to be adopted to protect the Sector's workers
- Clear guidance required as to how, and when the 80% Government contribution to staffing costs will be applied. This is contributing to staff shortages with some front line staff not turning up for work assuming that 80% of their wages will still be met.

- Relaxation of the relevant existing legislation (or policy, as appropriate) with regard to licence/permit conditions to avoid public health risks of waste accumulating to include:
 - o Operating hours
 - o Maximum daily tonnage limits
 - o Waste storage time limits
 - o Waste storage capacity including temporary storage on unlicensed areas
 - o Credit extension on SEPA licence/ permit fees or charges
- Regulatory and Reporting Requirements
 - o Special measures to identify waste locations at potential risk of potentially contaminated materials and mandated procedures for their management.
 - o Temporary emergency revision of Scottish Landfill Tax legislation (or policy, as appropriate).
 - o Where feasible and agreed between contracting parties, waiving of contract penalties for failing to meet contractual KPIs.

Identifying the key actions that will need to be taken to mitigate any risk to public health is critical. This will require a nimble and flexible approach to enable the sector to make temporary operational, logistical and disposal solutions as the Covid-19 situation develops. Guidance should be communicated as phased and changeable as the situation develops.

Clear consistent centrally co-ordinated communications are critical with information being disseminated to all internal and external audiences (public and commercial sector).

Risk	Emerging Situation	Potential Mitigation Options
<p>Staff Shortages</p>	<ol style="list-style-type: none"> 1. Absence levels of up to 50% for LGV drivers and 30% or more for refuse collectors. 2. COSLA gathering information for councils. 3. SWITCH looking at figures for wider industry. 4. Ability of SMEs to retrain/redeploy is extremely limited. 5. Reduction in commercial waste collections. 6. Clarification required if all waste sector employees are included within the list of key workers. 7. Increasing quantities of household waste due to home working, self-isolation, DIY. 8. Increased skip hire. 9. As of 24th March there is already major disruption to existing kerbside services with absenteeism reported as 60% in some areas. 10. There is a lack of clarity in how and when the 80% contribution to staffing costs will be applied. This is contributing to staff shortages with some front line staff not turning up for work assuming that 80% of their wages will still be met. 11. Number of people working in close proximity in vehicle cabs is an emerging issue. 	<ol style="list-style-type: none"> 1. Letters of comfort confirming key worker status for both front line and support staff. 2. Council employees working on non-essential activities in other services could be re-trained/redeployed. 3. Requirement for fast track standardised training. 4. What statutory services should be prioritised and supported? Prioritisation should be given to the collection and disposal of waste that poses the greatest public health risk i.e. residual and food waste. 2 options are summarised below. 5. Allow commercial operators to mix residual waste with DMR on trade waste and recycling collection routes. 6. Sub-contracting of household waste collection services to local private sector waste management companies, utilising the vehicles and employees of the companies. 7. Secondment of private sector employees to councils to assist in the collection of waste. 8. Requires effective co-operation between councils and private sector companies, and may also require a relaxation of normal public sector procurement policies and regulations. 9. Clear guidance for employers and employees in how and when the 80% contribution to staffing costs will apply.

Risk	Emerging Situation	Potential Mitigation Options
Safe Operation of HWRCs	<ol style="list-style-type: none"> 1. Increased use of HWRCs and increased health & safety concerns for staff. 2. Some local authorities and commercial companies have, or are in the process of closing HWRCs. This is as a result of the increased risk to staff due to increased visitor numbers and social distancing not being observed. As of 24th March, many Local Authorities have closed HWRCs. 3. Increased incidences of dumping at HWRC entrances and fly-tipping. 	<ol style="list-style-type: none"> 1. Visiting HWRCs should be considered a non-essential journey. 2. Clear and consistent Covid-19 Guidance for Public Access to HWRCs and for HWRC staff. Exemplar Covid-19 HWRC Guidance is available from Resource Efficient Solutions. 3. HWRC closure across all of Scotland with opening only 'in extremis' circumstances. This would allow HWRC staff to be redeployed and would reduce risks to staff.
Availability of Essential PPE and other equipment	<ol style="list-style-type: none"> 1. Shortage of essential PPE including hand sanitizers, and full facial visors. 2. Increased risk of Covid-19 infection. 3. Treatment plant supply chain; for example lime, chemicals etc. 	<ol style="list-style-type: none"> 1. Maintain availability of essential PPE. 2. Maintain availability of essential supply chain requirements. 3. Priority access to suppliers and fuel.
Sufficient Disposal Capacity (EfW and landfill) and Status of Current Global markets	<ol style="list-style-type: none"> 1. Confirmation is required as to whether there is sufficient disposal capacity in the right places. 2. What impact on future planning will there be as a result of an increase in the rate of use of existing capacity. 3. Given the global market contraction has already reduced demand for recyclates what strategy is required to deal with materials which may require storage or disposal? 	<ol style="list-style-type: none"> 1. Implementation of a disposal capacity management plan involving priority access for prescribed waste streams.

Risk	Emerging Situation	Potential Mitigation Options
<p>Guidance required from Health Protection Scotland (HPS) to protect the health of the Sector's Workers</p>	<p>Clarification sought re the current gov.uk guidance states that household waste containing CoV19 should be double bagged and held inside for 72 hours. This was necessary in the containment phase is this still the case?</p> <p>Clarification is sought as to what guidance can be used with respect to PPE?</p> <p>Standard PPE is more than adequate (based on guidance for clinical waste) but the issue will be ensuring people understand its importance and use it correctly.</p> <p>Current advice implies the risk is probably no greater than normal domestic waste however there is a perception of an increased risk – how can this best be managed to ensure service levels to the households and businesses are maintained?</p>	<ol style="list-style-type: none"> 1. HPS approved guidance for the Sector's workers – including measures to time-lag treatment to reduce material contamination risks if processing material on picking stations 2. Reinforcement of existing use of appropriate PPE 3. Production of standardised risk assessment 4. Clear consistent credible and accessible communication for front line staff 5. Will special notifications be required for waste from known sources of infection?

Risk	Emerging Situation	Potential Mitigation Options
<p>Relaxation of Legislation re Licence/Permit Conditions</p>	<p>Public health risks of waste accumulating and the need for further storage?</p>	<ol style="list-style-type: none"> 1. Relaxation of the relevant existing legislation (or policy, as appropriate) with regard to licence/permit conditions to avoid public health risks of waste accumulating to include: <ul style="list-style-type: none"> • Operating hours • Maximum daily tonnage limits • Waste Storage Time Limits • Waste Storage Capacity including temporary storage on unlicensed areas • Leachate Management • Credit Extension on SEPA licence/permit fees or charges 2. Relaxation of the Waste (Scotland) Regulations to allow the ability to co-collect residual waste with materials that have been separated for recycling for both public sector and commercial operators. Could this be achieved through SEPA producing an updated regulatory position statement?

Risk	Emerging Situation	Potential Mitigation Options
<p>Regulatory and Reporting Requirements</p>	<p>Ensuring household collections are maintained and disposed of in a timely and safe manner will be critical to preventing other health emergencies and increased risk of other transmittable diseases.</p> <p>Increase in waste arisings due to emergency waste collection strategy thereby increasing tax liability if waste is landfilled.</p> <p>Reduction in key staff in the short term leading to prioritised work streams which does not include data and report submissions.</p>	<ol style="list-style-type: none"> 1. Special measures to identify waste locations at potential risk of potentially contaminated materials and mandated procedures for their management. 2. Temporary Emergency Revision of Scottish Landfill Tax legislation (or policy, as appropriate) to include removing/ reducing tax threshold and deferment of tax return submissions. 3. Where feasible, waiving of contract penalties for failing to meet contractual KPIs. 4. Defer requirement for data and report submissions to SEPA for at least 1 month

Additional Points for Consideration:

Option 1:

Collect residual waste weekly if resources permit. Suspend all other collections, dry recyclates, bulky uplifts and garden waste.

- Pro - relatively easy to communicate and to establish a standard collection service.
- Con - significant volumes of waste that might otherwise be recycled will be landfilled or incinerated.
- Con - may lead to the lay-offs of staff we need to maintain for deployment over time.

Con - if recyclates collections are suspended, or if residual waste is able to be placed in recycling bins this may lead to increased contamination issues and a reduction in recyclate quality post crisis.

Option 2:

Prioritise collections based on available resources for both public sector and commercial operators:

1. Residual Waste Collections
2. Food Waste Collections (including comingled garden & food)
3. Container Collections (cans, plastics)
4. Glass
5. Fibre collection.
6. Garden Waste collection (non-statutory)
7. Bulky Uplifts (non-statutory)

- Pro - allows maintenance of separate recycle collections when resources permit.
- Con - frequent changes to services will need to be continuously re-communicated to householders and customers.
- Con - frequent changes to services will need to be continuously re-communicated to householders and customers.
- Con - needs consistent application as variable services could encourage unnecessary cross Council movements of waste.

Industry Sector Support for High Risks Group

Consideration could be given to a relaxation of landfill tax credit fund award criteria. This would allow scheme administrators to use a % of the fund to help some of the local volunteer groups who are setting up support & delivery services to help the high risk groups who aren't able to help themselves during the crisis. There could be potential for this to be done through a temporary small grants scheme where the application process could be simplified.

Draft Report produced by RMAS
Members: John Ferguson, Laura Tainsh, Wendy Rayner, Chris Ewing, Robin Baird, Ross Fenwick and Nicki Souter in collaboration with CIWM, the Local Authority Waste Managers Network and SESA/ESA.

