

# Estates Waste Management Policy 2020

# WASTE MANAGEMENT POLICY & PROCEDURES

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This document is available on the Estates Internet Page and has been distributed in particular to:

Estates – Maintenance  
Purchasing  
IT  
Health & Safety

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# Waste Management Policy & Procedures

## 1. Summary

The Open University is committed to reducing its waste by a minimum of 1% per annum and quarterly figures are produced to illustrate progress. Additionally, the following legislation places requirements on The Open University:

- Environmental Protection Act (EPA) 1990 – which establishes a duty of care on The Open University to ensure waste is stored responsibly and to record movement of waste and ensure that waste is transported and disposed of legally.
- Controlled Waste Regulations 1992 – defining clinical waste and how it should be dealt with.
- Landfill Tax Regulations 1996 – a tax introduced to discourage the disposal of waste to landfill sites and to encourage waste reduction.
- Special Waste Regulations 1996 – require the Environment Agency to be pre-notified before toxic and dangerous waste is moved.
- The Producer Responsibility for Packaging Waste Regulations 1997 – gives organisations obligations for recycling and recovering their packaging.
- The Hazardous Waste (England and Wales) (Amendment) Regulations 2009 came into force on 1 October 2009 and incorporate Hazardous Waste Regulations 2005 – (which replaced the Special Waste Regulations 1996). These alter the requirement to register with the Environment Agency when producing hazardous waste from over 200kg to 500kg. This does not affect The Open University's current registration requirement. Producers of hazardous waste must notify and register with the Environment Agency every premises generating hazardous waste. The waste must be segregated, detailed records maintained and registration must be undertaken annually. There have been changes to hazardous waste controls to include a new hazardous property H13 (Sensitization) and changes to consignment note procedures
- WEEE Regulations 2007 – Waste Electrical & Electronic Equipment introduces producer responsibilities for recovery and reuse.
- The Landfill Directive 2007 requires all non-hazardous waste to be treated before being land filled.
- Batteries Directive 2008. The directive divides batteries into three categories: industrial, automotive and portable (consumer). EU Member States must achieve minimum collection rates for portable batteries of 25% by 2012 and 45% by 2016. Easily accessible collection points must be available to consumers within two years of the directive coming into force (i.e. mid 2008). Distributors will have to take back the waste batteries at no extra cost to the consumer, and must inform the consumer that this service is available. Producers of industrial and vehicle batteries must also take back waste batteries free of charge

Battery collection points are available in the catering outlets at Walton Hall to ensure compliance with disposal legislation.

- Waste Framework Directive – The Waste Framework Directive, which is the primary European legislation for the management of waste, has been revised. These revisions have been implemented in England and Wales through the Waste Regulations 2011 and ancillary legislation. The revised Waste Framework Directive places greater emphasis on the waste hierarchy to ensure that waste is dealt with in the priority order of:
  - prevention
  - preparing for re-use
  - recycling
  - other recovery (for example, energy recovery)
  - disposal

Following the waste hierarchy is good practice which businesses should adopt as a matter of course. The Open University is clearly mandated to follow the waste hierarchy when determining the disposal and or further use of materials.

- End of Waste Regulations – The European Commission has been developing these regulations for various materials, scrap iron, glass etc. These are still being developed and further information will be provided once published.

## **2. Statement of Intent**

The Waste Management Policy has been produced to affirm the Open University's commitment to safe and efficient waste management, to reduce and recycle waste produced and to ensure compliance with and exceed all legal requirements relating to waste management. It also promotes environmental and recycling issues as an integral element of its activities and demonstrates its commitment to continual improvement in environmental practices.

This Policy provides procedures for Open University staff in dealing with waste and recycling issues.

The Policy supports The Open University's Sustainability, Energy, Environmental and Carbon Management policies that can be found via the Estates Intranet website.

## **3. Waste Management Strategy**

The Open University undertakes to:

- Follow efficient waste management and recycling procedures throughout The Open University and use recyclable and recycled materials whenever appropriate.
- Promote a purchasing policy that will give preference, where practicable, to those products and services which cause least harm to the environment.
- Reduce its waste to landfill to achieve a 36% reduction between 2005 and 2020 in alignment with the carbon reduction target. Quarterly statistics and annual statistics (reported for HEFCE Estates Management Statistics) will be produced to illustrate performance.

## **4. Waste Management Legislation**

The Environment Agency provides advice and guidance on complying with legislation, their website can be viewed at <http://www.environment-agency.gov.uk>

### **4.1. Environmental Protection Act (EPA) 1990**

The requirements of the EPA cover the management of waste disposal. The Waste Management Licensing Regulations 1994 were made under the EPA. With the introduction of the "duty of care" being the most significant aspect of the EPA as far as the waste producer is concerned in that:

- Different waste types must be segregated and identified. Unsegregated waste invariably ends up on landfill sites, costing money as it has little value to the recycling industry.
- A transfer note, provided by the Waste Disposal Company, must be kept as a record of the movement of waste. This must be retained for a minimum of 2 years.
- Only registered carriers of waste can collect the waste. Under the duty of care the Open University is liable if any waste is fly-tipped or otherwise disposed of incorrectly, even if the fly-tipping was done by the carriers or disposal company.

The Duty is designed to be a self-regulating system based on common sense management of waste and good business practice. It is the responsibility of the organisation discarding waste to make an assessment of each item and to segregate and dispose of it safely.

The EPA also has a Code of Practice on Litter and Refuse collection. External areas should be maintained free from litter and debris to the standards required within the EPA.

#### **4.2. The Controlled Waste Regulations 2012 SI 811 (revokes the 1992 regulations)**

The main changes relate to the classification of waste as household, industrial or commercial waste, and lists the types of waste for which local authorities may make a charge for collection and disposal. These Regulations classify waste according to its origins. They define **clinical waste** as:

- a) "Any waste which consists of human or animal tissue, blood or other body fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, or syringes, needles or other sharp instruments, being waste which unless rendered safe may prove hazardous to any person coming into contact with it and"
- b) "Any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood or transfusion, being waste which may cause infection to any person coming into contact with it."

Clinical waste is collected from Walton Hall site fortnightly by a registered carrier.

#### **4.3. The Producer Responsibility for Packaging Waste Regulations 1997**

These Regulations give organisations at different parts of the packaging chain, obligations for recycling and recovering their packaging. While The Open University is exempt from these regulations, given its Charitable status, all cardboard packaging received at the Wellingborough warehouses is recycled. Cardboard recycling facilities are also available at Walton Hall and regionally.

#### **4.4. The Hazardous Waste (England and Wales) (Amendment) Regulations 2009**

All hazardous wastes must be disposed of through a registered waste carrier who can demonstrate their registration and compliance. It is the responsibility of the producer (OU) to audit waste carriers to ensure this compliance from time to time. While much waste can be identified by labelling, a definition is:

*"Hazardous Waste is any waste which contains a hazardous substance in such a quantity liable to cause death, injury or impairment to living beings, pollution of waters, or unacceptable impact on the environment, if improperly handled, treated, or disposed of".*

If in any doubt, or you require The Open University Hazardous Waste registration number, you should contact the Estates Liaison Line ext. 51000, e-mail Estates-Liaison for further advice.

#### **4.5. Waste Electrical & Electronic Equipment Directive 2007**

The E.U. Directive on Waste Electrical & Electronic Equipment lays down measures which aim to reuse, recycle and recover such wastes so as to reduce the disposal of waste.

#### **4.6. The Landfill Directive 2007**

This directive requires all non-hazardous waste to be treated before being land filled. This is defined by using a 'three-point test'. All three criteria must be satisfied for all of the waste to have been treated:

- 1) It must be physical, thermal, chemical or biological process including sorting.
- 2) It must change the characteristics of the waste
- 3) It must do so in order to:
  - (a) reduce its volume; or
  - (b) reduce its hazardous nature; or

- (c) facilitate its handling; or
- (d) enhance its recovery

#### **4.8 Batteries Directive 2008**

Batteries are collected centrally and disposed of through a registered carrier. Producers are not willing to take back waste vehicle batteries pending the government's implementation of the directive.

### **5. Implementation of the Waste Policy**

#### **5.1. Waste Hierarchy**

The strategy uses the principle of the waste hierarchy:

1. REDUCE – the best approach to waste is to reduce it at source.
2. REUSE – if you cannot reduce it, then try to re-use it.
3. RECYCLE – if you cannot reuse it, then try to recycle it.

#### **5.2. Implementation**

Several recycling waste streams have been implemented at Walton Hall diverting much from landfill. The key to successful recycling and reduction in landfill is to collect at source and segregate. A number of contracts with waste management and recycling firms have been established in order to provide the means to implement the waste policy.

The following items are currently recycled:

All paper products (excluding blue roll)  
Cardboard  
Wood  
Metal  
Media waste – CD's; DVD's; floppy discs; videos; audio cassettes  
Plastic bottles, packaging, cups, food containers and all metal cans  
Glass  
Garden waste  
Batteries  
Carpet Tiles  
Waste Oil  
Food  
WEEE – waste electrical & electronic equipment  
Furniture

All other waste is compacted with 75% segregated for further recycling and 25% converted to refuse derived fuel.

#### **5.3. Purchasing**

The purchasing function has a real impact on the quantity and recyclable value of waste. Choosing and buying recycled products is part of an overall waste reduction strategy. As source reduction is an issue that often gets overlooked the Purchasing Department consider the following activities as part of its function:

- To cut down on over-packaged products - is packaging reusable?
- To purchase refillable or reusable products e.g. printer or toner cartridges

- To use or lease equipment that has waste reduction features e.g. photocopiers, email etc.
- To use durable items where relevant, not one-trip disposable items
- To buy equipment that can easily be mended or has interchangeable parts
- To specify/buy items made with recycled materials
- To check stationery supplier catalogues for recycled items
- To consider using cost savings from waste reduction activities, e.g. photocopiers set to double-sided, to pay for activities that may cost a little more until economies of scale come in to play.
- To investigate the options for centralised purchasing between organisations. Bulk buying cuts costs and gives more negotiating power with the supplier.

These examples are by no means comprehensive but, in general, when buying materials the Purchasing Department should consider if the product is reusable and has been or can be recycled. Further details on purchasing strategy can be found at [http://intranet.open.ac.uk/finance/p6\\_3002.asp](http://intranet.open.ac.uk/finance/p6_3002.asp)

## 6. Procedures for Recycling and Disposal

### 6.1 Confidential paper

At Walton Hall departments that have shredders should shred all confidential paper, clear waste sacks should be used for shredded paper, and tied bags placed in local waste collection points ready for pick up by the portering team.

Departments that do not have shredders and have confidential paper requiring disposal should request yellow waste bags from Estates Liaison Line. Confidential paper should be bagged up and securely kept by each department. When there is sufficient bags ready for collection users should contact Estates Liaison Line and request the portering team to collect. The waste is then securely moved to a secure location ready for collection by a dedicated waste supplier, with destruction certificates supplied for each collection.

Areas generating large & regular volumes of confidential waste should contact Estates Liaison Line requesting a lockable bin, the portering team will manage the safe and secure collection of waste from these bins.

A small amount of confidential paper, from the payroll office, is shredded on site through an external contract.

Regionally, contracts exist with paper processing companies whereby confidential waste can be stored in specific bins around the office until collection is made.

All department should ensure confidential material is stored securely until shredded or collected for disposal by the porters or specialist contractor.

#### 6.1.2 Non confidential waste paper

This should be placed in one of the many recycling bins around the offices which are lined with **clear plastic bags**. There are also desk trays available where you can place your waste paper pending placing in the central recycling bins (call the Liaison Line ext. 51000 if you would like one). Do not allow the recycling bins to become overfilled. Filled sacks should then be left for collection at your local waste collection point, details of these can be found at:

<http://intranet6.open.ac.uk/estates/main/>

#### 6.1.3 Magazines, Journals etc.

These can also be recycled but are too heavy for the plastic liners. Please place in cardboard boxes and clearly label 'RECYCLING' for collection by Porters from your waste collection point.

#### **6.1.4 Cardboard**

Cardboard should be flattened and placed at your waste collection point.

#### **6.1.5 Cans, Plastic Bottles\Wrapping and Cups**

At each catering outlet and within office areas there are specific containers for cans, plastic bottles/cups and paper cups

If you require bins for recycling purposes, please contact the Estates Liaison Line on ext. 51000 or e-mail on Estates-Liaison

#### **6.1.6 Glass bottles**

There are a number of external glass collection points across the Walton Hall campus, campus staff are encouraged to use these bins see <http://www.open.ac.uk/about/estates/waste/recycling-locations>

Glass waste from pantry kitchens should be placed into the glass caddie in each kitchen, these bins are emptied by the cleaning teams

If you break glass and can handle it safely, place it in a sturdy secured box and advise the Liaison Line (ext. 51000). If you cannot handle it safely, cordon off the immediate area and call the Liaison Line for assistance.

#### **6.1.7 Wood & Metal**

For large quantities contact the Liaison Line on ext. 51000 to arrange for its collection.

#### **6.1.8 Redundant CDs, Audio and Video Tapes**

Send to the Porters Lodge, Estates for recycling.

#### **6.1.9 Toner Cartridges**

Printer inkjet and toner cartridges from both workgroup laser printers and multi-function printers are recycled centrally by IT.

### **6.2 Non-recyclable office waste**

There should be very little waste from your office that is not recyclable, examples of non-recyclable waste are blue roll, juice cartons, elastic bands, place this waste into the General Waste bins.

### **6.3. Hazardous Waste**

#### **6.3.1 Clinical Waste**

This is collected on a regular fortnightly basis from specific designated areas.

#### **6.3.2 Chemical**

Prior to collection, chemicals are stored in a secure storage area. Access to the store can be arranged through the Estates Liaison Line ext. 51000 e-mail Estates-Liaison.

A comprehensive list of chemicals that require storage must be supplied, a blank form, to provide this information, can be obtained from the Liaison Line. A technician, from the Faculty of Science, will sign the collection docket from the waste carrier. No-one else is authorised to do so.

### **6.3.3. Batteries**

Receptacles for their collection are available in the following catering outlets: The Hub, Berrill Café, Michael Young Café and East Campus Cafe.

### **6.3.4 Radioactive waste**

Radioactive waste is stored in a secure location on site, the disposal of this waste is arranged by the Radiation Protection Officer (x55051) on an annual basis to comply with the Environmental Agency waste permit. There is some very low level waste, which can be disposed of through the normal black bag waste route and poses an insignificant risk to human health if used the waste is checked and monitored by the departmental Radiation Protection Supervisor prior to being discarded.

### **6.3.5 Biological/Chemical Drain**

Also known as the 'sump', as best practice this should be emptied every three years or as directed by Anglian Water, the next date will be February 2019. Arrangements should be made in conjunction with the Chemical Health and Safety Adviser (CHSA) and the Radiation Protection Officer (RPO). Estates will also be advised of the work to be carried out.

A **minimum** of two weeks' notice of the work being undertaken must be given to allow the CHSA to notify the relevant people concerning the discharge of chemicals/radioactive solutions (as permitted) to the 'sump' and for the RPO to conduct monitoring of the 'sump' prior to the work being carried out.

### **6.3.6 Fluorescent Tubes & Sodium Lamps**

Spent tubes are stored securely by Estates pending collection by a registered waste carrier, for disposal as hazardous waste.

### **6.3.7 Research Design and Engineering Facility Bunded Tank**

This tank collects mineral based lubricating oil, vegetable based lubricating oil and various metal "fines" - very small fragments of metal from the machining process that are in suspension in the oil and coolant mix, from the lathes in the above workshop. A two yearly schedule for emptying is in place. The Project Officer, Design & Engineering is the current contact point ext. 52277.

## **6.4 Waste Electrical and Electronic Equipment**

The intention of the Waste Electrical and Electronic Equipment (WEEE) Directive is to ensure manufacturer and importer compliance in the treatment of waste, whilst encourage reuse and recycling. However the majority of IT equipment is supplied through dealerships, as an outcome this transfers some of the responsibility to the dealer, but primarily compliance rests with the product consumer (in much the same way as the disposal of a redundant fridge is the responsibility of the user). The consumer, in this case the Open University, must ensure that equipment is disposed of via a licensed Authorised Treatment Facilitator. This is especially true for hazardous waste, where regulations state that an Environmental Agency approved Facilitator should be used if over 200Kg of Hazardous waste is produced, in terms of IT equipment for example non-functional CRT monitors are now defined as hazardous waste. Normally the ionised

radiation is prevented from leakage by the leaded screen, however this cannot be guaranteed in a failed unit, thus CRT monitors are now deemed to be hazardous waste.

IT have for many years forged relationships with WEEE approved contractors, thus ensuring that The Open University remains fully apprised of any changes with regard to the WEEE directive, and continues to dispose of equipment in the appropriate manner.

This can be achieved in various ways from re-distribution to charities and schools for example, to full recycling of component parts and re-use of waste materials.

All other electrical waste on campus is collected within an enclosed metal container and likewise disposed of through an authorised treatment facilitator.

## **6.5. Asbestos**

Any asbestos waste, or other material waste presumed to contain asbestos, will be disposed of by authorised contractors in accordance with the requirements of the Hazardous Waste (England and Wales) Regulations 2005. The disposal process will be fully documented. Copies of completed Hazardous Waste Consignment Notes received back will be provided to the asbestos supervising officer for the asbestos register and held for 5 years.

## **6.6. External Waste**

### **6.6.1. Construction Waste**

Contractors' capability to dispose of waste in accordance with the duty of care is assessed as part of the approved contractors' questionnaire or pre-purchase questionnaire.

### **6.6.2. Building entrance litter and cigarette bins (designated smoking areas only)**

Entrances and cigarette bins are cleaned and bins emptied weekly. If you wish to report a problem, please call the Liaison Line on ext. 51000.

### **6.6.3. Litter picking and external litterbins**

This is the responsibility of Grounds Maintenance staff at Walton Hall. The work is carried out once a week at Walton Hall. If you wish to report a problem, please call the Liaison Line on ext. 51000.

## **6.7 Bagged Waste/Recycling**

It is important that the correct waste goes into the appropriate sacks to ensure all recyclables are segregated.

As a general reminder, the sack colours for wastes are as follows:

Black: General waste

Clear: Shredded paper waste or any other office paper for recycling and plastic bottles and cans

Yellow: Un-shredded confidential paper waste

**Please note that much of the waste collected at Walton Hall by porters and cleaners is lifted manually across campus to waste and recycling receptacles. Please ensure that individual sacks for collection are not overfilled. 13 Kg's should be the maximum weight per bag. General guidance states 'if it is too heavy for you, it is too heavy for the porters'.**

## **6.8 Food Waste**

Most of the food waste from the catering outlets is processed by our anaerobic digestion machine.

Food waste from campus pantry kitchens should be placed in the food waste caddy ready for collection and onwards recycling.

## **6.9 General Safety Precautions**

All bags, containers and sharp boxes must not be filled more than three quarters full to enable safe handling, to prevent excessive weight and to avoid splitting the containers.

All clinical waste bags, sharps containers or boxes containing glass must be securely fastened before removal and marked to indicate the content and with the department of origin.

Filled sharps containers or boxes containing glass must never be subsequently placed into any other waste bag or container before disposal.

Bags must be inspected by staff for adequate sealing and for no sharps protruding before handling.

Staff must handle bags by the neck of the bag and keep the bags clear of the body to minimise risk of sharps' injury. If this is exceptionally not possible to do, and staff have to hold the base of the bag, extra care must be taken to examine the bag for sharps before doing so.

Care must be taken when transporting and storing batteries that they cannot be shorted out by contact of one battery's terminals with another or by metal conductors.

Bring to the attention of your supervisor any bag that is hazardous because of sharps protruding, excessive weight or visible contamination on the external surface.

Any needles, syringes or contaminated sharps items found in buildings or grounds must not be handled. Report these to the Liaison Line, ext. 51000, who will contact the Health & Safety team.

## **7. Procedures for ongoing monitoring and updating**

It is the responsibility of Estates, in particular the Operations section, to ensure that changes in legislation in relation to waste and its derivatives are adhered to and that all affected units within The Open University are advised accordingly.

Regular communication between relevant units is essential and links will be maintained with relevant staff, particularly those mentioned within this document.

These procedures will be updated as required and re-issued at least annually in May each year.

Waste Disposal Guidelines for Estates Staff  
Last updated June 2020

WASTE TYPE	RECEPTACLE	LOCATION	COMPANY	COMMENTS
<b>CONFIDENTIAL PAPER WASTE</b>	SECURE CONTAINER	MEACHAM YARD	RESTORE DATASHRED	YELLOW SACKS KEEP LOCKED AT ALL TIMES
<b>NON-CONFIDENTIAL PAPER</b>	SECURE CONTAINER	MEACHAM YARD	RESTORE DATASHRED	CLEAR SACKS
<b>CARDBOARD</b>	15 YD SKIPS	GOODS IN	NATIONAL PAPER RECYCLING	PLEASE FLATTEN BOXES FIRST
<b>GENERAL OFFICE WASTE COLLECTIONS</b>	COMPACTORS	MEACHAM YARD	BIFFA	BLACK SACKS
<b>BULK ITEMS UNSUITABLE FOR COMPACTOR</b>	35 YD SKIP	MEACHAM YARD	BIFFA	
<b>SCRAP METAL</b>	BLUE 10 YD OPEN SKIP	MEACHAM YARD	A. GOODMAN	
<b>FLUORESCENT TUBES &amp; BULBS</b>	ENCLOSED METAL CONTAINERS (2)	MEACHAM YARD	VEOLIA	
<b>FRIDGES</b>	ENCLOSED METAL CONTAINER	MEACHAM YARD	BIFFA	NOT FOR GENERAL WASTE SKIPS
<b>ELECTRICAL (WEEE)</b>	ENCLOSED METAL CONTAINER	MEACHAM YARD	BIFFA	IT EQUIPMENT DEALT WITH BY IT
<b>GLASS BOTTLES</b>	GREEN WHEELIE BINS	PAVILION, REAR CATERING HUB, BERRILL, CELLAR BAR, WIND TUNNEL, MICHAEL YOUNG, BY BUS STOPS, MEACHAM YARD, EAST CAMPUS	BIFFA	BROKEN GLASS SHOULD BE SECURED IN BOX
<b>CHEMICAL WASTE</b>	CHEMICAL STORE	REAR OF VENABLES NR. LOADING BAY	TRADEBE	CONTACT LIAISON LINE TO ARRANGE STORAGE 51000
<b>BATTERIES</b>	RECEPTACLES IN CATERING OUTLETS	RELOCATED TO SECURE STORE PRIOR TO DISPOSAL	BATTERY BACK	COLLECTION RECEPTACLES IN CATERING OUTLETS
<b>RADIOACTIVE</b>	N/A	N/A		CALL HEALTH & SAFETY ext. 53344
<b>MEDIA WASTE CDS, TAPES</b>	WASTE STORAGE AREA	VARIOUS	VEOLIA	SEND TO PORTERS
<b>COMPOSTABLE GREEN WASTE</b>	26 YD OPEN CONTAINER	ADJACENT TO COMPOUND	BIFFA	NO LARGE WOOD
<b>CANS/PLASTIC BOTTLES/PLASTIC WRAPPING</b>	RECYCLING BINS	CATERING OUTLETS/STAFF KITCHENS	BIFFA	DO NOT CONTAMINATE WITH OTHER ITEMS
<b>NEEDLES&lt; SYRINGES OR CONTAMINATED SHARPS</b>	SHARPS CONTAINER TO BS7320	HEALTH & SAFETY	TRADEBE	DO NOT HANDLE, REPORT TO HEALTH & SAFETY