

# Waste Industry Safety and Health Forum INFORMATION DOCUMENT

# COVID-19 AND WASTE MANAGEMENT ACTIVITIES

This is version 3 of WISH's COVID-19 and waste management activities information document produced on 23 April 2020, the original having been released on 2 April and version 2 on 15 April. It is based on HM Government advice, industry experience and current knowledge, all of which may change. You should first always follow the latest HM Government advice (<a href="https://www.gov.uk/coronavirus">https://www.gov.uk/coronavirus</a>). HM Government activity on COVID-19 is being led by the Department of Health and Social Care and PHE (Public Health England) in conjunction with the devolved administrations.

Please note that it is <u>NOT</u> the intent of this information sheet to provide a general and comprehensive 'one-stop-shop' for advice on COVID-19. The emphasis here is on waste management specific issues. You should also read and understand the freely available HM Government and other advice (such as at the above web address, and the links given in section 6 and throughout this document) and use these in conjunction with this document.

This is a 'live' document and may be further updated and revised as new information is released and as the issue develops. If you have a comment on this document please send it to <a href="info@wishforum.org.uk">info@wishforum.org.uk</a>.

**Tip** – advice, guidance and resources on COVID-19 are available from various sources, including graphics on how to wash your hands, symptoms and similar. These are generally free to download and use. Use this type of resource as posters, hand-outs for employees and similar to reinforce issues such as good hygiene.

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For ease of accessing updates a brief summary of significant changes since the last version of this document is provided in green italic text at the start of each section.

# 1. COVID-19 and waste management

Changes from previous version: The only significant addition/change to this section is further information on RIDDOR reporting and COVID-19.

We have an unprecedented situation which requires information to be provided swiftly. The below is based on advice and information available at the time of preparation and may be updated. Please check the issue number and date against the copy held on the WISH website (https://wishforum.org.uk/) to ensure you have the most up to date version.

#### What is COVID-19 and why is it a problem?

Coronaviruses are a large family of viruses that can cause illness such as respiratory tract infections. A novel coronavirus is a new strain that has not been previously identified in humans. The strain which is responsible for the development of COVID-19 originated in Wuhan, Hubei Province, China and is 'zoonotic' in origin, e.g. from animals and is known as SARS-CoV-2. The virus is a problematic pathogen due to how easily it is apparently spread from human to human, currently it is thought one person may infect up to three others, even when asymptomatic (not showing any symptoms).

#### Why COVID-19 may be a problem for the waste industry?

To limit the spread of the disease it is important that individuals self-isolate if they, or their family, have symptoms, or if they are vulnerable. This could result in significant absence from work. Estimates of the impact vary, but at a low-end 15% of workers may be absent, and at a high-end some estimates range to in excess of 50%. Such levels of absence would very likely have a significant effect on the delivery of essential waste management activities.

#### **COVID-19 and RIDDOR reporting**

The HSE (Health and Safety Executive) has released guidance on reporting of COVID-19 cases under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences

Regulations). See: <a href="https://www.hse.gov.uk/news/riddor-reporting-coronavirus.htm">https://www.hse.gov.uk/news/riddor-reporting-coronavirus.htm</a>. However, just because a waste operative may potentially have contracted COVID-19 from a workmate, such as if they shared a vehicle cab during their work, would not on its own make this reportable as an exposure to a biological agent at work without further evidence of direct causation. Reporting would likely only be applicable if a worker is knowingly dealing with those with COVID-19 or symptomatic persons as part of their job, such as those working in the healthcare sector. Further information is available at the link above and in section 6 of this document. If in doubt, contact the HSE for advice.

# 2. Symptoms and what to do if an employee shows or reports the symptoms

Changes from previous version: There are no significant changes/additions to this section.

#### What are the symptoms?

The primary symptoms are reported as being fever and dry cough. For more detail see https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/.

#### What to do if an employee shows the symptoms of COVID-19

Please also first see <a href="https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19#what-to-do-if-someone-develops-symptoms-of-coronavirus-covid-19-on-site">https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/.</a>

Current Public Health England (PHE) advice is that: "If anyone becomes unwell with a new, continuous cough or a high temperature in the business or workplace they should be sent home and advised to follow the stay at home guidance (https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance).

"If a member of staff has helped someone who was taken unwell with a new, continuous cough or a high temperature, they do not need to go home unless they develop symptoms themselves. They should wash their hands thoroughly for 20 seconds after any contact with someone who is unwell with symptoms consistent with coronavirus infection."

From the above, if a person with no symptoms themselves has only been in indirect or potential contact with someone who has or is suspected of having COVID-19, there is no reason for them to stop work and go home. Likewise, if one employee has been confirmed or is suspected of having COVID-19 there is no need to send the whole of the rest of the workforce home, although thorough cleaning of the area they work in (office/cab/rest room etc) is recommended (see links below under cleaning procedures for advice).

Should an employee show the symptoms of COVID-19 while at work:

 Instruct them to leave work immediately and follow HM Government advice, even if they state they feel well enough to continue to work

- Instruct them to stay at home to recover and follow HM Government advice, which is currently to self-isolate unless symptoms become worse, in which case they should follow NHS advice via <a href="https://https://https://https://https://www.nhsinform.scot/self-help-guides/self-help-guide-coronavirus-covid-19">https://www.nhsinform.scot/self-help-guides/self-help-guide-coronavirus-covid-19</a>, or at <a href="https://www.nhsdirect.wales.nhs.uk/contactus/">https://www.nhsdirect.wales.nhs.uk/contactus/</a> as appropriate)
- Instruct them not to return to work until free of fever, feeling well enough AND a minimum of 7 days have elapsed since the first onset of symptoms (see also HM Government advice on this as isolation may need to be longer. See: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/877678/coronavirus-leaflet.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/877678/coronavirus-leaflet.pdf</a>
- Instruct them to contact their workplace should they subsequently be confirmed as having COVID-19 (provided they are well enough to make such contact)
- Instruct them to contact their workplace after the 7 days (as above) have elapsed and
  if they are well enough to return to the workplace
- Clean their work area (office, vehicle cab and similar) thoroughly before allowing other persons to access them (see links below under cleaning procedures for advice)

Should an employee develop symptoms while not at work, they should be instructed to notify you via telephone, e-mail, text or similar that they believe they have the symptoms. They should be instructed **NOT** to come into work to inform you. The same basic process as above should then be followed.

# 3. Controlling the spread of COVID-19 – general precautions

**Changes from previous version:** Significant additions/changes to this section include further reinforcement that PPE does not remove the need for good hygiene, notes on potential shortages of specific types of PPE, changes in guidance and sources of guidance, and clarification regards vulnerable and extremely vulnerable persons.

#### Controlling the spread of COVID-19

Full details of how COVID-19 is transmitted are still unknown (see: <a href="https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/">https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/</a> for more <a href="details">details</a>). The two main methods being used to reduce transmission are good hygiene and 'Social Distancing'. Please also see Defra advice specific to the waste management industry at <a href="https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance#waste-management-businesses">https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance#waste-management-businesses</a>.

#### **Good hygiene**

The **MOST** important control for preventing the spread of any infection is good hygiene. This cannot be over-emphasised. Good hygiene practices should already be in place in waste management operations – these **MUST** be maintained. Employees should be instructed to:

- Use tissues to cover their mouth and nose when they cough or sneeze (CATCH IT)
- Place used tissues in a bin (or bag) as soon as possible (BIN IT)
- Wash their hands regularly with soap and water (KILL IT)
- Clean surfaces and contact points regularly to get rid of germs (KILL IT)

For the above to be effective, employees need to have tissues available and, if they are not site based, bags available to dispose of used tissues. Employers should provide these.

#### 'Social Distancing'

In addition to good hygiene, the use of 'Social Distancing' is also included in HM Government advice (see <a href="https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people/guidance-on-social-distancing-for-everyone-in-the-uk-and-protecting-older-people-and-vulnerable-adults">https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-for-everyone-in-the-uk-and-protecting-older-people-and-vulnerable-adults</a>). This means keeping at least 2 metres (>6 feet) away from other people.

Social Distancing may pose issues for some waste management activities – see specific advice section below. In general, you should consider precautions such as staggering shift changeovers, not requiring drivers to collect lorry keys in person, staggering use of welfare facilities, limiting the number of people allowed at any one time in offices, welfare facilities and other areas and similar.

**Note** – searches on the internet and similar may reveal older and superseded advice on Social Distancing. Such searches may also reveal definitions from other countries and/or guidance aimed at industries and sectors other than waste management. Current HMG and waste management industry applicable definitions and advice should be used.

#### Cleaning procedures etc

Cleaning procedures should already be of a high order in any waste activity for basic hygiene reasons. HM Government advice specifically in relation to COVID-19 is available at <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/876221/COVID19\_Guidance\_Cleaning.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/876221/COVID19\_Guidance\_Cleaning.pdf</a> and at <a href="https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings">https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings</a>. You should reinforce cleaning arrangements and consider the below:

- Ordinary cleaning, such as with soap and water, alcohol sprays, normal cleaning agents or disinfectant, will kill any virus
- Damp dusting should replace any dry dusting
- Telephones and computer equipment should also be cleaned with wipes or by other means by following HM Government guidance
- If an employee has gone off sick with COVID-19, their workstation, including telephone and keyboard, vehicle cab etc should be cleaned using normal cleaning materials and methods
- Cleaning of crockery and utensils can be conducted using hot water and detergents
- Shared facilities, such as toilets and showers, should be cleaned frequently, including door handles, toilet flush handles/buttons and similar 'touch surfaces'
- Good hygiene should be maintained regards workwear and laundry services. Used workwear should be placed in bags for laundry and not left in a 'pile'. Laundry bags should themselves be laundered (to prevent secondary contamination) or disposable bags used and suitably disposed of when the workwear is laundered. See also guidance at <a href="https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/">https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/</a>

#### Handling wastes - can I catch it this way?

Latest research indicates the virus could survive on cardboard for 24 hours, and metal/plastics for up to 72 hours. It is important to note this work exposed these surfaces to high concentrations in a laboratory environment and is likely to be the 'worst case' scenario. It is good practice to ensure a high standard of hygiene when handling waste materials, as should always be the case in all waste management activities. The virus survives on the skin for more than enough time to allow hand to mouth/nose/eyes transmission.

There may be discarded materials from individuals who are themselves infected with COVID-19. The public are being educated to double bag any discarded tissues and leave for 72 hours before placing them in their main residual waste bin/bag.

Where waste has already been designated as 'clinical waste', clinical waste procedures should already be in place. Those procedures can be followed as normal.

#### **PPE** (personal protective equipment)

Two types of PPE are often quoted in relation to COVID-19: gloves and masks.

**Gloves.** To be effective glove use needs to be in conjunction with good hygiene measures, and good 'glove discipline'. For example, if an employee stops work to eat/drink/smoke the basic process is gloves off, wash hands thoroughly, eat/drink/smoke, wash hands again, put gloves back on. For more information see <a href="https://www.hse.gov.uk/skin/employ/gloves.htm">https://www.hse.gov.uk/skin/employ/gloves.htm</a>. Employees should be made aware of the limitations of glove use, such as touching their faces while wearing gloves which may be contaminated, and that gloves are no substitute for good hygiene and hand washing.

Gloves should already be in use for many waste management activities, and this should continue. In the case of reducing the risk of transmission, gloves should:

- Be impermeable/waterproof
- Or, supported by use of impermeable gloves used underneath standard gloves

Employees must be provided with an adequate supply of gloves and instructed to change gloves at a frequency appropriate to the type of glove and its use, and that glove use does not mean that good hygiene and hand washing are not required. For further details on glove selection and use see <a href="https://www.hse.gov.uk/skin/employ/latex-gloves.htm">https://www.hse.gov.uk/skin/employ/latex-gloves.htm</a>.

Masks. One item of PPE which has been the subject of publicity is the use of face masks. The need for RPE (respiratory protection equipment) to protect from coronavirus must be based on risk assessment. For example, current guidance states that healthcare workers undertaking high risk aerosol generating procedures on COVID-19 patients are required to wear FFP3 respirators, whereas those looking after patients with COVID-19 wear fluid repellent surgical masks. Waste industry workers are unlikely to encounter the same level of risk as either of these examples. However, where a risk assessment has previously indicated that an employee would be expected to wear respiratory protection as part of their normal job then they should continue to do so.

On face masks, Public Health England (PHE) currently states: "We do not recommend the use of facemasks as an effective means of preventing the spread of infection. Face masks play an important role in clinical settings, such as hospitals, but there's very little evidence of benefit from their use outside of these settings". Prolonged use of masks may also have problems. For example, wearers may be tempted to adjust the fit frequently risking hand to face contact, masks may become moist so trapping contaminants, germs and similar. Experience is that the prolonged use of RPE is unlikely to be effective. Further advice is available at <a href="https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19.">https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19.</a>

Notwithstanding the above where an organisation does decide to use RPE:

- Their risk assessment must include the risk of employees placing overreliance on RPE to the detriment of other more effective controls such as good hygiene and Social Distancing, resulting in a higher not lower risk of transmission, AND what will be done to reduce this risk
- Their risk assessment should also include a clear description of the reasons why RPE is to be used AND the limits and specific situations for use
- Limit use of RPE to short periods and only in specific situations were adequate Social Distancing may not be reasonably practicable – multiple research indicates that the prolonged use of RPE is unlikely to be effective
- Instruction of employees in the use, storage, replacement, and disposal of RPE, AND
  the limitations of RPE as a precaution AND the risks associated with overreliance on
  RPE to the detriment of other more effective precautions

For more information see <a href="https://www.hse.gov.uk/respiratory-protective-equipment/types-rpe.htm">https://www.hse.gov.uk/respiratory-protective-equipment/types-rpe.htm</a> and <a href="https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm">https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm</a>.

**Note** – some organisations are reporting shortages of specific types and standards of PPE, such as some types/standards of gloves and masks. Where alternative types and standards of PPE are being considered to address any such shortages employers should ensure that the level of protection remains adequate. Employers should also be wary if offered alternative types/standards of PPE which they are unfamiliar with as a replacement. If in doubt competent advice should be sought and, as applicable, risk assessments reviewed.

#### Vulnerable and extremely vulnerable persons

Persons with pre-existing conditions, or other individual factors, may be more prone to suffering more serious effects from COVID-19. See link below for what may make someone a vulnerable or extremely vulnerable person and advice:

https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people/guidance-on-social-distancing-for-everyone-in-the-uk-and-protecting-older-people-and-vulnerable-adults and at <a href="https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-extremely

Current HM Government advice is that vulnerable persons should practice stringent Social Distancing and that extremely vulnerable persons should self-isolate (stay at home). Should an employee be suspected of or confirmed with COVID-19 you should assess whether you employ any vulnerable or extremely vulnerable persons.

# 4. Changes in response to COVID-19

**Changes from previous version:** Significant additions/changes to this section include notes on mental health and wellbeing and violence and aggression at work, potential longer hours of working and fatigue and a new sub-section on 'returning to business as usual'.

#### Maintaining critical competencies and standards

Waste operations require minimum standards of safety and competency. Any contingency and similar measures taken in regard to COVID-19 must not compromise these.

Health and safety requirements, such as plant operator licences, permits to work, machinery lock off and isolation etc. **MUST NOT** be compromised: COVID-19 is not an excuse to reduce safety or training requirements. For example, reducing crew size in household collections to the point that safe reversing procedures cannot be followed.

Environmental permit/licence and other legal requirements must be maintained even during any widespread COVID-19 outbreak. If you plan to take any contingency or similar action which may affect your permit/licence or have an environmental impact you should contact your environmental regulator first, and you would be advised to keep up-to-date on any announcements, temporary regulatory position statements and similar from your regulator relating to COVID-19.

#### **Change management**

In response to the COVID-19 pandemic many organisations are making temporary changes to the way they operate. Health and safety should be a core consideration when considering such changes to avoid unintended consequences. For example, closing CA/HWRC sites may remove the risk of transmission at such sites, but may also result in an increased demand for bulky waste collections, which may be simply moving a problem from one place to another.

Any modification to work equipment, including vehicles and machinery, in response to COVID-19 must be considered very carefully to avoid compromising other safety features, emergency escape and similar. Good change management is critical with any modification of work equipment.

Some employers have installed, or are considering installing, Perspex or similar 'screens' in their workplaces and/or vehicle cabs, similar to those which have been installed in some supermarkets at check-outs or those already in place for security reasons in buses or other public transport vehicles. Dependent on their design and placement, screens may reduce, to an extent, the risk from projected particles/aerosols, such as produced when someone coughs, but there is little evidence currently that they are effective in preventing the spread of viruses. Notwithstanding the above where an organisation does decide to consider screens:

- A design change risk assessment should be performed to ensure that safety arrangements and features, such as emergency escape, machinery safety provisions and fixed fire systems, are not adversely affected by the installation of screens
- The change risk assessment must include the risk of employees placing overreliance on screens to the detriment of other more effective controls such as good hygiene and Social Distancing, resulting in a higher not lower risk of transmission, AND what will be done to reduce this risk
- The risk assessment should also include a clear description of the reasons why screens are to be installed AND their limitations
- Instruction should be given to employees on the limitations of screens as a precaution
   AND the risks associated with overreliance on screens to the detriment of other more effective precautions
- Screens should be subject to the same cleaning regimes as other equipment

Please also see specific mentions of screens below under the sections on vehicles and collections operations and MRFs and recycling plants.

Changes to ways of working, procedures, operations, PPE use and similar may need to be put in place quickly during the pandemic. However, changes still need to be considered carefully to ensure any health and safety consequences are assessed, including as appropriate whether they meet the test of being 'reasonably practicable' (see <a href="https://www.hse.gov.uk/risk/theory/alarpglance.htm">https://www.hse.gov.uk/risk/theory/alarpglance.htm</a>). Likewise, relevant parties should still be involved when making decisions:

- Consult with employees on changes. They may have a different perspective or place a different level of importance on an aspect of any change. They may also have knowledge and experience not held by management
- If a change involves third parties, such as customers and clients, consult with them
- For some changes, the involvement of specialists or external competent persons may be required or advised

**Tip** – experience is that decisions and changes made quickly may not be recorded with normal rigour. Organisations may be wise not to forget this aspect and ensure they record their decision-making process, risk assessments and similar which led to any change and the detail of the change, including the involvement of third parties.

Staff shortages and changes to ways of working may result in longer working hours. Employees may also, understandably, have concerns about their work and COVID-19 risk (whether these concerns are well founded or not they may be very real to the employee). In addition, changes to services, such as HWRC/CA site operation and collections, may result in adverse responses from members of the public and others.

- Employers should monitor working hours to ensure that safety standards are not degraded, and be aware of the risks associated with fatigue (see: <a href="https://www.hse.gov.uk/humanfactors/topics/fatigue.htm">https://www.hse.gov.uk/humanfactors/topics/fatigue.htm</a> and <a href="https://www.hse.gov.uk/humanfactors/topics/specific2.pdf">https://www.hse.gov.uk/humanfactors/topics/specific2.pdf</a> for further advice)
- Employers should consider the mental health and wellbeing of their workers during the current crisis. This may not be directly work related, but employers may want to make information available such as at: <a href="https://www.nhs.uk/oneyou/every-mind-matters/?WT.tsrc=Search&WT.mc\_id=Brand&gclid=EAlalQobChMl6qHAmoz86AlVhOF3Ch1ENg7uEAAYASAAEgKNi\_D\_BwE">https://www.nhs.uk/oneyou/every-mind-matters/?WT.tsrc=Search&WT.mc\_id=Brand&gclid=EAlalQobChMl6qHAmoz86AlVhOF3Ch1ENg7uEAAYASAAEgKNi\_D\_BwE</a>. Resources are also available at: <a href="https://campaignresources.phe.gov.uk/resources/campaigns/82-every-mind-matters/resources">https://campaignresources.phe.gov.uk/resources/campaigns/82-every-mind-matters/resources</a>
- Changes to services may result in adverse reaction from the public, including aggressive and violent behaviour. As relevant, workers should be informed that all such must be reported and that in serious cases the police should be called. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate

#### Inspections, testing, maintenance and repairs

Concerns relating to the examination of equipment, such as under the Lifting Operations and Lifting Equipment Regulations (LOLER) have been raised (see:

https://www.hse.gov.uk/news/assets/docs/loler-pssr-during-outbreak.pdf). At the current time, the HSE (Health and Safety Executive) has not issued any exemptions or relaxation of these requirements. Inspections of equipment should continue to be done, and can be done safely, following Public Health England guidance (see:

https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19).

Tests, inspections, daily/weekly and similar checks, critical maintenance and similar must be maintained, unless legal derogations are put in place dictating otherwise.

Engineers who are working on sites where there are restrictions arising from the risk of COVID-19 infection should comply with site rules and Public Health England advice regarding good hygiene practices and separation distances. Consideration needs to be given to protecting engineers but also, where relevant, any vulnerable persons who may be affected by their work. Such measures should already be in place at waste management operations and include for example the cleaning-down of equipment, mobile plant and vehicles before any maintenance and repair, and the use of appropriate PPE during such activities.

#### Returning to 'business as usual'

COVID-19 has resulted in various changes to waste management services, perhaps most notably and commonly the suspension of green and bulky waste collections and the temporary closure of HWRC/CA sites. Whatever the changes made, resumption of services needs careful consideration and planning. Waste management operators, and their clients, should start to plan in advance now for the resumption of services and returning to 'business as usual', or at least more normal services.

Where waste collection services, such as green and bulky waste collections, have been suspended, there may be a backlog of waste waiting for resumption of service. Waste management operators, and as applicable their clients, may want to consider:

- Phased resumption, such as not resuming all services at the same time
- Any additional resources required to tackle any backlog
- Communication with the public regarding the resumption of services, how this will be handled and any restrictions which will be in place
- For commercial waste collections, close communication with customers and clients to ensure that as they reopen services can be resumed in an orderly and safe manner

Where HWRC/CA sites have been temporarily closed their reopening needs to be planned carefully. Waste management operators, and their clients, may want to consider:

- Phased opening of HWRC/CA sites rather than opening all sites at once
- Partial opening, such as only accepting specific types of waste in the short-term. For example, only accepting green and bulky wastes for the first few weeks
- Use of pre-booked time slots for members of the public rather than allowing everyone to simply turn-up at the HWRC/CA site

- Restricting access, such as by post code or 'odd/even' car registrations on different days to allow phasing of initial demand
- Restrictions on the number of cars allowed into a site at the same time, and using a 'one-in-one-out' approach when safe capacity is reached
- Queuing capacity, both on and off site, and how this will be managed. And, for off-site
  queuing advance communication and discussion with the local police force, and
  consideration of any police resource requirements
- Closing-off alternate car parking spaces to aid Social Distancing
- Reduced or extended hours of opening dependent on specific situations
- Use of floor markings (tape or paint) to reinforce Social Distancing
- Additional resources which may be required to manage any backlog
- Communication with the public regarding the resumption of services, how this will be handled, any restrictions on services which will be in place and similar
- External support which may be required, such as from the police, to manage the safe and orderly reopening of HWRC/CA sites, and communication and planning with such external resources before sites are reopened

See also section 5 on HWRC/CA site operation regarding maintaining Social Distancing, assistance to members of the public and similar.

The suspension of various waste management services was achieved quickly in response to the COVID-19 crisis. The safe resumption of services is likely to be more complicated and time consuming and requires careful thought and planning in advance.

# 5. Specific advice

**Changes from previous version:** Significant additions/changes to this section include additions in the collections sub-section on aggression and violence and sleepers in bins and hazardous items in wastes, sampling and testing processes in recycling plants, public waste bins and paperless transfers at weighbridges.

The sections below contain advice for specific waste management operational types and functions. These operational types are varied, and you should assess your own specific operations, using the below, and reasonable practicability as appropriate, as a starting point. Please also see the advice given at: <a href="https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance?utm\_source=075ed450-af83-4469-8137-749615f595ea&utm\_medium=email&utm\_campaign=govuk-notifications&utm\_content=daily#waste-management-businesses.">https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance?utm\_source=075ed450-af83-4469-8137-749615f595ea&utm\_medium=email&utm\_campaign=govuk-notifications&utm\_content=daily#waste-management-businesses.</a>

#### Street cleansing – public waste bins

Litter and the contents of litter bins can include drug paraphernalia and may have been frequented by rodents. Precautions and procedures should already be in place to ensure that persons collecting such materials are suitably protected from harmful substances in those materials. Litter and the contents of litter bins, including gloves and masks discarded by the public while out exercising, shopping for food and similar, can be collected and bagged using the normal precautions and procedures.

#### Vehicles and collections operations

Obeying 2-metre Social Distancing may be not be reasonably practicable for personnel who work together in the cabs of some waste collection vehicles. However, as an essential service it is important collection operations continue. What is reasonably practicable will depend on the specific circumstances of each collection methodology and type and each collection area. When deciding upon the measures to take consideration should be given to the following:

Can the collection be suspended, or reduced? For commercial and industrial waste collections many customers may be closed for business or running at reduced capacity – collections from such customers could be suspended, or the frequency of collection reduced. For household collections it may be worth considering suspending some types of collection, such as green waste and bulky waste collections (but, see above on change management to avoid unintended consequences)

If reasonably practicable, use single-person operation. For many commercial and industrial waste collections this is already the case, and for others it may be practical to reduce twin-person operation to single-person, provided that safety standards are not compromised. Other than in limited cases, for household collections single-person collection operation is very unlikely to be reasonably practicable or safe, in which case please see below

Having considered the above, the below applies to **ALL** collection activities, and in addition to the general precautions given above:

- Cabs should have available alcohol or soap-based cleansing and/or wipes available for all surfaces which should be cleaned periodically throughout the day and especially at the end of each shift. Cleaning should pay particular attention to doorhandles, hand holds/rails, dashboards, steering wheels, hand-brake levers, gearbox and other controls and indicator stalks etc. Do not forget external touch-surfaces such as lifting equipment and compaction control buttons and levers
- Where fitted, 'pop-up' sinks on waste collection vehicles should be subject to the same rigorous cleaning regimes as for any other welfare facility. Where pop-up sinks are fitted, disposable paper towels or similar should be available to dry hands
- Where a vehicle may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the vehicle should either be decontaminated thoroughly (see advice at <a href="https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings">https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings</a>) or if this is not reasonably practicable parked up and not used for a minimum of 72 hours
- Collections operations may result in contact with members of the public/customer employees. Social Distancing should be followed (at least 2 metres/>6 feet away from other persons). Should this prove impossible, such as a member of the public not being willing to 'stand away from their bin' the waste should not be collected. In extreme cases members of the public may display aggressive and potentially violent behaviour. All such cases must be reported, and collections operatives informed to contact the police immediately if they are threatened. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate
- Safety precautions which would normally be taken, such as the use of respiratory protection during the collection of waste which is particularly dusty or might shed significant fibres must be maintained

- Normal monitoring processes aimed at checking that crews are following good standards of safety should be continued, and the scope of such monitoring extended to include maintenance of Social Distancing and enhanced concentration on good hygiene practices and glove-use
- Normal precautions aimed at reducing the risk of 'sleepers in bins' and hazardous items in waste streams, such as gas cylinders, should be maintained

If single-person collection operation has been assessed as not being reasonably practicable, such as is likely for most household waste/RCV (refuse collection vehicle) activities, or is likely to be unsafe, then in addition to the above and the general precautions given elsewhere in this document:

- Consideration should be given to reducing the number of persons who share cab space. In some areas it might be possible for crews to travel independently to an area or estate and work as a group to fill RCVs that are sent with individual drivers and which go off to tip sequentially as they are filled and return. It is recognised, however, that there will be cases where such alternative methodologies cannot reasonably practicably be used. Where this is the case the primary control method is to maintain high standards of hygiene
- Having considered the above, where reasonably practicable, time spent in shared cabs should be minimised, although it is accepted this may not always be achievable
- Where alternative methods either of transporting employees to collection points, or collection, is used organisations MUST take suitable and sufficient measures to ensure that employees still have access to a sufficient supply of soap and water, alcohol based sprays or wipes and other materials for them to be able to maintain a high standard of hygiene and that collection operatives maintain Social Distancing during actual collection of wastes
- Where minibuses and similar are used to ferry employees to collection areas they should be subject to the same cleaning processes as given above for lorry cabs
- Where possible maintain consistent crew rosters (same crew members in each team every day) and minimise close interactions between crews. It is recognised that employee absence and crew competency requirements may limit the extent to which this is possible
- If safe to do so, crews may be dropped-off outside waste management sites so that only the driver proceeds to tipping areas before picking the crew up on the way out

Open cab windows to encourage airflow (see: <a href="https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance?utm-source=075ed450-af83-4469-8137-749615f595ea&utm-medium=email&utm-campaign=govuk-notifications&utm-content=daily#waste-management-businesses)</li>

Where multiple-person crews are being used and lorry cabs are being shared, if a member of a crew develops the symptoms of COVID-19, or they contact their manager/supervisor to state that they have developed symptoms:

- The cab must be decontaminated (see link above) or the vehicle parked-up for at least 72 hours. If a crew member develops symptoms partway through the working day, this must be done immediately even if it means aborting the collections round
- The crew member showing symptoms must be sent home immediately
- All crew members MUST immediately wash their hands thoroughly
- If at all reasonably practicable the remaining crew should not be allocated to a different crew, nor should a crew member from a different crew be allocated to fill the gap left by the person who has developed symptoms, unless they can travel separately and maintain Social Distancing when working. The time period for this type restriction, seven, 14 days or longer, will depend on the situation. The principles at <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/874011/Stay\_at\_home\_guidance\_diagram.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/874011/Stay\_at\_home\_guidance\_diagram.pdf</a> may assist in informing employers regards an appropriate time period for restrictions
- Reinforcement instruction on precautions such as maintaining good hygiene should be conducted for all crews

If the above hierarchy of considerations is followed, required measures taken, and good hygiene practices enforced, the residual risks to employees will be minimised and will be low.

Some organisations have fitted, or are considering fitting, Perspex or similar screens in vehicle cabs (see section above under change management). Specific to cabs, and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- The material used should be appropriate to reduce risks such as the screen shattering in the event of a road traffic collision producing shards which may cause injury
- The blocking of or impeded access to safety critical controls

- Distortion of driver vision resulting from an installed screen
- Screens should be subject to the same cleaning regime as the rest of the cab
- Emergency escape from the cab

If the installation of screens is being considered, advice should be sought from the vehicle manufacturer/supplier or a suitably qualified and experienced vehicle engineer to ensure critical safety aspects are not compromised.

#### **Bulky waste collections**

Concerns have been raised about the risks associated with the collection of soft furnishings, mattresses and similar items as part of bulky waste collections.

Such items have the potential to be contaminated with a wide range of insects, parasites, and potentially harmful organisms many of which survive longer in the environment than coronaviruses. Existing risk assessments for the collection and handling of such items should have considered this potential and identified controls. This might include wearing gloves and other protective equipment. Plus, instructions that where such items are dusty or shedding large numbers of fibres precautions should be taken which might include the damping of the waste with water or a disinfectant and/or the wearing of a dust mask.

#### **Mobile plant**

In addition to the above general measures:

- Cabs should have available alcohol or soap-based cleansing spray and/or wipes available for all surfaces which should be cleaned periodically throughout the day and especially at the end of each shift. Door-handles, hand holds/rails, dashboards, steering wheels, controls etc should be paid particular attention to
- Where an item of plant may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the plant should either be decontaminated thoroughly (see advice at <a href="https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings">https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings</a>/covid-19-decontamination-in-non-healthcare-settings) or parked up for a minimum of 72 hours
- If reasonably practicable, plant operators should be dedicated to one item of plant, or at least the number of operators using an individual item of mobile plant should be limited. The cab should be cleaned before it is given to a different user

#### Transfer stations, MBT, EfW, AD, landfills and similar

In addition to the above general measures:

Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face to face contact – stay in mobile plant where reasonably practicable, keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation etc

#### MRFs and recycling plants

In addition to the above general measures:

- Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face to face contact – keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation etc
- Picking cabins may be an issue because of their enclosed nature and proximity of pickers to each other – consider rearrangement of the work to allow every other waste chute to be used, staggered on each side of the picking belt, to maintain adequate Social Distancing of 2 metres
- Access and egress from cabins may also need to be considered, such as operatives
  entering and leaving one-by-one to avoid the need for people to pass near each other
  (save for in emergency situations such as a fire where the normal rules will still apply)
- Glove use should be reinforced for those working in picking cabins (see section above on gloves for detail of glove use)

Some organisations have fitted, or are considering fitting, Perspex or similar screens in picking cabins/lines (see section above under change management). Specific to picking cabins/lines, and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- Access to critical machinery safety provisions must not be impeded or restricted by the installation of screens. For example, access to 'pull-wire' emergency stop cords
- Any modification to or change of location of critical machinery safety provisions must be carefully risk assessed before being carried-out to ensure that access to such provisions and their effectiveness is not compromised. For example, the relocation of a pull-wire emergency stop cord to a less easily accessible position to facilitate the installation of screens, or a change in the 'run' of such cords which may compromise their effective operation

- Emergency escape from the cabin/line
- Potential interference with any fixed fire systems such as sprinklers (where fitted)
- Ability and access to clean the screen/s (screens should be subject to the same cleaning regimes as other equipment)

Recycling plant workers undertaking sampling and testing duties, such as for quality control and regulatory reasons, should already be working under appropriate controls, including adequate PPE. These controls should be maintained, and risk assessments relating to such duties reviewed in the light of COVID-19 to ensure they remain appropriate.

#### **CA/HWRC** sites

As CA/HWRC sites are places where members of the public may meet in numbers, the closing of sites should be considered until Social Distancing is relaxed (but, please see above example under change management regards bulky wastes and also in the same section on reopening of HWRC/CA sites). If there is necessity and it is essential for CA/HWRC sites remain open, then in addition to the above general measures:

- Issue instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face to face contact – keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation etc. The use of floor markings (tape or similar) or cones around containers may assist
- Issue instructions to cease assisting members of the public with wastes, keep Social
  Distance from members of the public to reduce the risk of transmission (note most
  CA/HWRC sites are contracted to local authorities and contact should be made with
  the authority as regards such measures)
- Items such as handrails on access steps to containers and other frequently touched surfaces and items should be cleaned frequently

Please also see section 4 on changes and in particular the text on the reopening of HWRC/CA sites.

#### Welfare facilities

To reduce the opportunity for person to person transmission and maintain Social Distancing consideration should be given to staggering rest breaks. For example, people number could be limited. Where capacity is reached the facility should operate a "one in, one out" situation. Staff and supervisors should be given responsibility to police and control this. A regime should be put in place to ensure that rest areas are thoroughly cleaned after rest breaks and other uses (for example morning brief and afternoon debrief sessions).

All surfaces, crockery, cutlery etc. should be thoroughly cleaned/washed after use and surfaces should be cleaned periodically throughout the day. Items such as doorknobs should not be forgotten. Hand washing to be promoted and actively encouraged, and provision of wipes, sanitisers, soap to be made. **HOT** running water is essential.

Smoking areas are often also social gathering points. Staggering rest periods will assist but maintaining 2m separation during smoke breaks is still required.

It is common for waste management sites to provide toilet and other welfare facilities to visiting drivers and collection crews. HSE has reiterated that all drivers must have access to welfare facilities in the premises they visit as part of their work. Preventing access is against the law; equally it's not the sensible thing to do. Those who already provide reasonable access to toilets and handwashing facilities should continue to do so. With the latest advice for hands to be washed regularly, failure to allow access to welfare facilities may increase the risk of the COVID-19 infection spreading. Please note that the general precautions, hygiene and Social Distancing apply equally to all on site including third parties.

#### Weighbridges

In addition to the general precautions listed above:

- Where reasonably practicable weighbridge windows to be kept closed (you may as a
  possible option want to consider installing transparent shields, as is being introduced
  at some supermarket check-outs) although these should not be relied on as the sole
  control being used
- If paperwork needs to be exchanged, impermeable gloves to be used, along with frequent washing of hands by weighbridge staff
- Where temporary regulatory relaxations have been put in place and as a result no paperwork exchange or other contact with shared items such as single digital signature pads is required, glove use may be relaxed, although frequent handwashing will still need to be maintained as good hygiene practice
- If still in use, the frequent cleaning and disinfecting of items such as digital signature pads, pens, clipboards and similar

**Note** – various temporary regulatory statements relating to waste transfer processes and 'duty of care' have been released by the main GB environmental regulators. You are advised to keep up to date with any developments in this area, and that you ensure that you understand the requirements relevant to your operations. If in doubt, contact your environmental regulator for advice.

#### 6. Other information and links

- https://111.nhs.uk/covid-19
- https://www.nhsinform.scot/self-help-quides/self-help-quide-coronavirus-covid-19
- https://www.nhsdirect.wales.nhs.uk/contactus/
- <a href="https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection">https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection</a>
- https://www.gov.uk/government/publications/guidance-to-employers-and-businessesabout-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19
- https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcaresettings
- https://www.ecdc.europa.eu/en/factsheet-health-professionals-coronaviruses

#### RIDDOR and COVID-19: Statement from the HSE

To assist in the interpretation of reporting requirements under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) regards COVID-19, the HSE (Health and Safety Executive) has stated: "For an incident to be reportable as a disease due to occupational exposure to a biological agent, there must be reasonable evidence suggesting that a work-related exposure was the likely cause of the worker contracting COVID 19. Such instances could include, for example, frontline health and social care workers (e.g. ambulance personnel, GPs, social care providers, hospital staff etc) who have been involved in providing care/treatment to known cases of COVID 19, who subsequently develop the disease and there is reasonable evidence suggesting that a work-related exposure was the likely cause of the disease. A doctor may indicate the significance of any work-related factors when communicating their diagnosis."

## **Disclaimer and WISH**

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