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Sent by email to General Dental Practices:

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Our Ref PC/NPA/2024-01-23
email Paul.Cushley2@nhs.scot

Dear Colleague

Urgent Information for all General Dental Practices

You may be aware of approaches to dental practices where your Board Waste Management Officer (WMO) has requested access to the practices waste and audited the process you use to manage your waste on site. Pre-Acceptance Auditing is not new and has been in place for some time now. Your cooperation is both required due to regulation and the risk of breaching the current contractors permit which will ultimately result in the waste permit being removed by the regulator and there will not be availability of waste collection service for NHS Scotland Boards, or if a PAA is not received the contractor will refuse to collect waste from your site. **All contractors are under the same regulation so there would be no alternative to uplift.**

The take home messages for Dental Practices are:

You need to carry out these waste audits as it is the expectation of SEPA (our regulator) that waste is the responsibility of the waste producer, and they therefore have a duty of care on site to ensure that they are compliant with guidance and regulation at site level. If you do not complete these audits your waste will not be collected from your practice

You must complete competently the Producer Pre-Acceptance Audit (PAA) and support may be available from your Board WMO to assist or answer questions on this regular recurring task, depending on the volume of waste you produce.

As waste producers we need to ensure that we are not putting at risk our staff, contractors and patient ensuring that waste is managed and streamed correctly. This gives our clinical waste contractor confidence that our waste is not going to cause them to breach their permit or cause damage to equipment, injury of staff or result in loss of their site/service.

The audits are a relatively straight forward administrative task that practice managers should be able to manage on behalf of the practice.



Chair Keith Redpath
Chief Executive Mary Morgan

NHS National Services Scotland is the common name of the Common Services Agency for the Scottish Health Service.

Background

NHS Scotland's current waste contractor (Tredebe) **as with all other clinical waste contractors in the UK** is subject to the Pre-Acceptance Audit (PAA) requirements as set out initially in the EA's guidance on the management of clinical waste ('How to comply with your environmental permit: additional guidance for clinical waste (EPR 5.07), and further adopted by SEPA <https://www.sepa.org.uk/media/w0qdaa1l/guidance-for-the-storage-and-treatment-of-healthcare-waste.pdf>.

By way of explanation waste pre-acceptance is the process of assessing the characteristics of a waste to enable a decision to be made about an appropriate disposal/recovery method. Comprehensive normal waste sampling isn't practical for clinical/healthcare wastes due to their hazards (which make handling of the waste inappropriate). This means that clinical/healthcare waste is sampled and assessed **at source** by inspecting it as its generated and reviewing the processes for its production, segregation, and subsequent management. These audits and associated administrative requirements for dental practices are not a one-off requirement, they will be a regular ongoing business as usual obligation. The nature of dental practice is that this may be a training requirement for all members of a dental practice team, however sites should be aware of the waste they are generating and be compliant with the legislation for production and segregation of that waste.

Failure by a Health Board or site to provide a current and accurate PAA and/or failure of the contractor to demonstrate they have possession of a current and accurate PAA could potentially lead to the contractor being in breach of their Permit (such breaches put the entire NHS Scotland contract at risk). Failure to provide accurate information or providing false information will lead to the waste and the audit document being rejected by the contractor.

The NHS Scotland's current waste management contractor Tradebe have been in contract for some five years now, and PAA's have been ongoing since the beginning of the contract. Initially many of the PAA's were provided and carried out by the Board WMO, however it is the expectation of the regulator that as the practice produces the waste they should be responsible for completing PAA's in line with the regulation and guidance.

The monitoring of the audit process' are an ongoing business-as-usual function collaboratively between your Boards waste management team, our waste collection contractor and SEPA. This will quickly have to become part of your dental practices' ongoing administrative responsibilities, and your WMO will be able to inform you of timescales and frequency of audit.

Boards staff, in particular the boards Waste Management Officer (WMO) and team members have received training from Albion Environmental on how to complete PAA's and the legislative requirement around them when the contractor came into position. The PAA document itself is not complicated, and requests information regarding how you manage waste on your site. Board WMO's may be able to support and provide information should you have any queries regarding the wider process.

Kind regards



PAUL CUSHLEY
Director of Dentistry