

## Fact-sheet - How to develop a waste management procedure?



### What is the objective?

The objective of the waste management procedure is mainly to:

- **Provide** the main information about the waste generated on-site (types, nature, characteristics, amount, etc.);
- **Give** the instructions about how to collect, store and dispose the waste.

This document should help the factory to better control the waste generated on-site, properly collect and store the waste, make sure the workers are trained about the waste management and ensure there is a follow-up on the final waste disposal methods.



### How to achieve this objective?

**Step 1: Write** your waste management procedure/policy. The content should cover the following topics:

- ✓ List of waste types generated by the factory (for each production section / activity / area) and average amount of each waste type generated per week or per month;
- ✓ Hazardous<sup>1</sup> waste identification: list of hazardous wastes;
- ✓ Waste inventory: who is in charge? To be updated how often? Records format?
- ✓ How to handle the waste? Importance of safety measures to ensure the workers/cleaners safety;
- ✓ How to store the waste? Importance of waste segregation and labeling;
- ✓ Waste management training: who is the trainer? Who should attend? Frequency of training? Content?
- ✓ Waste disposal: what is the final disposal for each waste type? What to expect from the contractors?
- ✓ Special instructions for specific waste type (e.g. medical waste, sludge<sup>2</sup>, etc.).

**Step 2: Appoint** a manager/employee who will be in charge of the implementation of the instructions as per the waste management procedure. This person should be in charge of the training of the employees/cleaners who will be involved in the handling and storage of the waste (see fact-sheet: “How to establish a waste management training”).

**Step 3: Review** and update your waste management procedure on a regular basis; a new waste type can be generated if there is any change in the production processes or a new raw material being used. Moreover, the factory might find ways to re-use one kind of waste instead of requiring a contractor to come and collect it.

- **Add** in your waste management procedure the good practices to minimize the waste generation and/or the opportunities to recycle the waste on-site.



- **Request** the manager appointed to control the implementation of the instructions to regularly inspect the waste storage conditions and control the waste collection practices so he/she can identify areas of improvement for a better waste management.



### Common non-compliances

#### **Generic waste management procedure**

The factory has only a one page document where are listed the waste types generated by the production site and the only instruction is to segregate the hazardous waste from the non-hazardous waste. The factory is not indicating: which waste types are hazardous, how to safely collect the waste, how to train the staff, etc.

<sup>1</sup> **Hazardous waste:** waste that because of its quantity, concentration, persistence or physical, chemical or biological characteristics may cause or significantly pose a substantial or potential hazard to human health or the environment when improperly treated, stored, transported or disposed.

<sup>2</sup> **Sludge:** means the residual, semi-solid material left from industrial and municipal wastewater and sewage treatment processes. It looks like a thick, soft or wet mud or a similar viscous mixture of liquid and solid components produced from a wastewater treatment process. Sludge can be highly hazardous.

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#### List of waste incomplete and hazardous waste identification incorrect

The factory did not identify all the waste types generated on-site and in particular, the medical waste was not identified by the factory as hazardous waste. The management did not analyze the characteristics of the waste to understand which waste is hazardous.

Examples of hazardous wastes:

- Sludge from industrial effluent treatment plant;
- Empty chemical containers;
- Medical waste;
- Electronic waste;
- Batteries;
- Fluorescent tube lights waste;
- Cleaning product waste;
- Waste oil;
- Grease and oil impregnated rags;
- ...

#### Instructions mentioned in the waste management procedure not enforced

The factory has a waste management procedure mentioning clearly that the empty chemical drums should be rinsed before temporary storage but there is no process to wash these drums and residues of chemicals were found in the empty drums. This means the instructions in the procedure are not implemented and no-one is in charge to verify the implementation.

See below an example of inconsistency between a waste management procedure (picture 1) and the real situation on-site in a factory (picture 2):

Instructions for storage of empty chemical drums:

- Dedicated shed for empty drums;
- No empty drums to be found in the production sections;
- No empty drums to be found scattered around the factory;
- Hard-surfaced floor or secondary containment;
- Rainwater ingress prevented;
- Empty drums properly rinsed to remove residues;

(Picture 1: extract from a waste management procedure)



(Picture 2: waste storage area in the factory where we can see the empty drums in direct contact with the soil)