



ANZ Clinical Waste Management Information Group Industry Code of Practice for the Management of Clinical and Related Wastes Review

Thank you for the opportunity to review the Industry Code Of Practice for the Management of Clinical and Related Wastes. It is the opinion of the ANF that the document is based on best practice and meets minimum requirements for the management of clinical and related wastes and congratulates the ANZCWMIG on such a comprehensive document.

Of concern to the ANF however, is the apparent lack of compliance generally in the health care industries. Although anecdotal, our constituent specialists in this area report a general lack of knowledge of, and response to the Code and waste management generally, by staff 'on the floor' or at the bedside. The Code does make frequent reference to the importance of community involvement and staff education and awareness, but there is an emphasis on training with little attention given to engagement. It would be effective to include a section that outlines guides for involving clinicians and other staff in a more effective manner, with a focus on engagement and involvement. The establishment of local waste watch committees is an example.

Whilst it is understood that the Code is generalist in nature and cannot afford to be specific with respect to individual products, it is known that some harmful products can readily be phased out. Mercury and PVCs (and related by-products), for example, are two toxin-generating pollutants that are significant enough in the health care industry to warrant special attention. Many international bodies and indeed governments have called for the minimisation if not elimination of these products from health care facilities.

It is noted that there is reference to waste minimisation in section 5.5 of the Code with reference to prudent product selection. The ANF, however recommends a much stronger statement regarding this aspect of waste management with specific reference to facilities auditing the use of products that have "greener" alternatives and setting reduction/replacement targets. Although this is recommended in the Appendix Four: Sample Waste Management Plan, it is felt that expansion in section 5.5 would have an added impact to this important component.

The ANF also recommends that the ANZCWMIG investigate the possibility of identifying pollutants that can be minimised through the use of known alternatives or practices and publish such in the form of an appendix to the code or at least make reference to publications that report on such research.

Overall the ANF would like to see, throughout the Code, a much stronger emphasis on the need to minimise waste production in the interests of health and safety risks by prudent product selection. It is disappointing, for example that waste minimisation, whilst implied, does not appear in section 1.2 as a specific part of the scope of this code.