

BLACK BAG SPLITTING AT HWRC/CA (HOUSEHOLD WASTE RECYCLING CENTRE/CIVIC AMENITY) SITES

*This WISH reference document is aimed at health and safety improvements in the waste management industry. This document is linked to **WISH WASTE 26 Managing health and safety at HWRC/CA sites** but is not a formal part of this guidance. It simply provides the text of a HSE position statement issued in 2019 regarding the splitting of black bags at HWRC/CA sites and the hazards and risks associated with this activity.*

Introduction

Over recent years some HWRC/CA (household waste recycling centres/civic amenity) sites have started splitting black bags of general waste to extract recyclable materials. At some sites this activity is undertaken by site staff, while at others volunteer members of the public are involved. This activity poses various hazards and risks, from manual handling and potential exposure to hazardous substances to bio-aerosol exposure and sharp objects in wastes. In 2019 the HSE issued a position statement on the practice. This statement was included in a WRAP (Waste and Resources Action Programme) information document. However, this document is no longer easily available. This WISH reference document reproduces the text from the 2019 HSE position statement as an information source which HWRC/CA site operators can consider as part of their risk assessment process. Readers may also want to read WISH's information sheet INFO 13 on bio-aerosols available at: [INFO 13 bio-aerosols in waste and recycling](#).

Text from 2019 HSE position statement

The below comprises the whole and unedited text of the 2019 HSE position statement on black bag splitting at HWRC/CA sites.

“If an Operator requires bags containing residual mixed municipal waste (i.e. black bag waste) to be hand sorted at Household Waste and Recycling Sites (HWRCs), they must first assess the health and safety risks to employees and others that arise from the activity, and, following the assessment, introduce all necessary control measures identified to protect those involved in the sorting process.

“The risks arising from hand sorting black bag waste are the same for whoever is required to undertake that activity, regardless of whether they are employed by the operator or not (e.g. contractors or members of the public). As such the Operator of the HWRC must provide the same standard of personal protective equipment (as well as any other equipment identified as being necessary e.g. litter picking tongs, hand washing facilities and first aid etc.) to whoever is sorting black bag waste.

“Key health risks to operatives and others to be considered when sorting include:

- *“Injection/dermal contact with blood borne viruses/pathogenic bacteria as a result of damage to the skin from sharps (needles, broken glass)*
- *“Contact with hazardous chemicals*
- *“Inadvertent ingestion of pathogenic bacteria (from nappies, cat litter etc.) due to poor hygiene measures*
- *“Possible inhalation of endotoxins and bioaerosols from organic waste*

“Other risks Operators should consider in the assessment include direct contact with waste during sorting and clearing and the potential for violence and aggression from members of the public.

“Effective supervision, monitoring and instruction are also key to managing the risks and should be included in any assessment. This is especially important if members of the public are required to hand sort black bag waste by the Operator.

“Some of the necessary control measures are outlined in the Waste Industry Safety and Health Forum guidance : ‘Health And Hazardous Substances In Waste And Recycling’ <https://wishforum.org.uk/wp-content/uploads/2017/02/WASTE-27-.pdf> and Hand Sorting of Recyclables (‘Totting’) <https://wishforum.org.uk/wp-content/uploads/2017/02/WASTE-18-.pdf> as well as HSE guidance on donning and doffing of gloves - <http://www.hse.gov.uk/skin/posters/glovesingleuse.pdf>.”