



STANDARD OPERATING PROCEDURE

COVID-19 HEALTH CARE WASTE MANAGEMENT ON CONSTRUCTION SITES

Document number	TGC-IMS-ENV-SOP-009.001
Business Name	Transnet Group Capital
Process/Activity Name	COVID-19 Health Care Waste Management
Process Owner Name	Khathutshelo E. Tshipala
Process Owner Signature	
Version number	1.0
Classification	Unclassified
Effective date	01 June 2020
Review date	01 September 2020

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1. PURPOSE

This purpose of this Standard Operating Procedure (SOP) is to provide the framework for handling, storing, transporting and/or disposing of COVID-19 Health Care Waste in an environmentally sound and legally compliant manner.

2. APPLICABILITY

These guidelines are applicable to Transnet managed construction sites.

This document shall be reviewed every three (3) months and/or as and when there are legislative and regulatory changes in relation to the COVID-19 Pandemic.

3. REFERENCE DOCUMENTS

Name	Reference Number	Applicable Section
Department of Health - Guidelines on Management of Coronavirus or COVID-19 Health Care Waste		Sections B and G
Management of Healthcare Waste	SANS 10248-1-2008	Part 1 – Management of Healthcare Risk Waste
Department of Environment Forestry and Fisheries: Draft Regulations on Health Care Risk Waste		Entire Document
COVID 19 Post Lockdown Construction Site Health and Safety Guidelines	TGC-IMS-HS-SOP-009.001	
Occurrence and Non-conformance Management Procedure	TRN-IMS-GRP-PROC 013	

Note: Any reference in this document to legislation or subordinate legislation is to such legislation or subordinate legislation at the date of promulgation thereof and as amended and/or re-enacted from time to time

4. DEFINITIONS AND ABBREVIATIONS

4.1 Definitions

Infectious Waste	Waste suspected to contain pathogens; and which normally causes or significantly contributes to the cause of increased morbidity of human beings.
Isolation Waste	Waste containing materials contaminated with excretions, exudates, or secretions from humans or animals who are required to be isolated (by the infection control staff, the attending physician or surgeon, the attending veterinarian, or the local health practitioner) in order to protect others from highly communicable or zoonotic diseases.

4.2 Abbreviations

CEMP	Construction Environmental Management Plan
EO	Environmental Officer
HCRW	Health Care Risk Waste
PES	Project Environmental Specification
PPE	Personal Protective Equipment
SES	Standard Environmental Specification
SOP	Standard Operating Procedure
TGC	Transnet Group Capital

5. ACCOUNTABILITY, RESPONSIBILITY AND AUTHORITY

5.1 Transnet Environmental Officer

Transnet's Environmental Officer's role and responsibilities will include, but not limited to, the following:-

- Review and approve the waste management plan/method statement in accordance with guidelines.
- Provide induction and training on the management of health care waste (PPE) to the Contractor and Transnet employees.
- Keep evidence of daily, weekly and monthly inspection of waste receptacles where the general health care waste is temporarily kept on site.
- Ensure that the Contractor's Environmental File is constantly updated with the quantities of health care waste generated on-site, date of removal, method of transportation and safe disposal certificates.
- Investigate and record any incidents/complaints related to Coronavirus or COVID-19 health care waste management, using the Transnet Occurrence and Non-conformance Management Procedure TRN-IMS-GRP-PROC 013.
- Liaise with the Contractor's Environmental Officer and project team to identify potential health care waste impacts/hazards.
- Maintain records of all non-conformances and incidents relating to the management of health care waste guideline noted on-site.

5.2 Contractor Environmental Officer

The Contractor's Environmental Officer's role and responsibilities will include, but not limited to, the following:-

- Develop the Health Care Waste Management method statement for review and approval by the Transnet Environmental Officer and Construction Health and Safety Agent for the site.
- Manage the implementation of the waste management plan and/or method statement.

- Provide Training and Awareness to all Contractor site personnel on the management of general health care waste.
- Provide and Designate bio-bins or plastic bags for the disposal of health care waste (PPE) for the temporary storage prior to removal and disposal.
- Ensure that healthcare storage points are managed in accordance with the stated requirements.
- Maintain Waste Manifest (PPE) records relating to the safe disposal of health care waste.
- Immediately address and report any non-conformances and incidents noted on site regarding the management of health care waste.
- Monitor and coordinate the staff assigned to containerize, collect, store, and transport healthcare waste on site.
- Contractor to provide Daily evidence of waste receptacles to the TRANSNET Environmental Officer where health care waste is temporarily kept for remotely situated sites.
- Maintain records of all healthcare waste quantities for disposal by the appointed service provider.
- Liaise with own and Employer's (Transnet) project team members to minimize any health care waste management anomalies and ensure compliance with the approved site healthcare waste management plan and/or method statement.

6. STANDARD OPERATING PROCEDURE

In terms of the National Environmental Management Waste Act, No. 59 of 2008, Transnet is a holder of waste as it generates, stores, accumulates, transports, processes, treats or disposes of waste.

With Covid-19 Pandemic, health care waste resulting from used Personal Protective Equipment (PPE) will be generated at workplaces/offices/construction sites imposing a duty of care on Transnet to handle, store, transport and/or dispose of waste in an environmentally sound and legally compliant manner.

The Guidelines on "Management of Coronavirus or COVID-19 Health Care Waste" published by the Department of Health on 30 March 2020 outlines the minimum

requirements for the management of health care waste (PPE) and provides for the two types of Health care wastes; namely:-

- Infectious waste – “Waste suspected to contain pathogens; and which normally causes or significantly contributes to the cause of increased morbidity of human beings”; and
- Isolation waste – “Waste containing materials contaminated with excretions, exudates, or secretions from humans or animals who are required to be isolated (by the infection control staff, the attending physician or surgeon, the attending veterinarian, or the local health practitioner) in order to protect others from highly communicable or zoonotic diseases.

6.1 Guidelines Applicable to TRANSNET Workplace/Offices/Construction Sites

The two Sections of the guidelines applicable to TRANSNET Workplace / Offices / Construction Sites include:-

- Section B - Health Care Facilities (Public and Private); and
- Section G – Workplace/Offices and Public Places

6.1.1 Section B of the Guidelines

Section B of the guidelines set out the minimum requirements for management of COVID-19 Health Care Risk Waste (HRCW) in workplaces/offices/construction sites.

These requirements are:-

- The waste stream generated from isolation units/wards during the care of COVID-19 patients shall be treated as isolation waste which is part of Category A infectious substances and handled as health care risk waste (HCRW).
- The waste shall be safely disposed of in doubled bagged (red liners) using designated single use box sets (50L or 142L) and tied when full.
- The designated single use box sets shall be marked “COVID-19” and labelled with the bio- hazard symbol/sign.
- The designated single use box sets including the double bags shall be properly sealed prior to internal collection.
- $\frac{3}{4}$ full sealed box sets shall be removed and stored at the central storage area prior to collection for treatment and disposal.

- Health Care Waste Officers/designated representatives shall witness collection at all times of the waste.
- A separate waste manifest document shall be made available to the health care facility indicating the volumes of COVID-19 waste removed.
- The waste shall be collected and transported with other health care risk waste streams/categories provided it is clearly identified and marked "COVID-19".
- The collection, removal and transportation of the waste shall be provided by the appointed or contracted service provider.
- The treatment and disposal of the waste must be conducted at a licensed HCRW treatment and disposal facility.
- However, the use of non-burn technologies must only be at treatment facilities where shredding is either part of an enclosed treatment process or occurs after treatment of the waste to minimize potential release and/or exposure of staff or personnel to COVID-19.
- All who handle health care waste should wear appropriate PPE. Proper hygiene practices to be performed/observed during and after the removal of health care/risk waste.

6.1.2 Section G of the Guidelines

Section G of the guidelines set out the minimum requirements for management of COVID-19 healthcare waste in workplaces/offices/construction sites.

These requirements relate to:-

- All waste generated at workplaces/construction and site offices including, but not limited to – used masks, gloves, and paper towels¹, is classified as general health care waste in terms of SANS 10248-1:2008.
- Such waste is to be placed in plastic bags and tied when full.
- The plastic bags to be placed with normal health care waste generated for collection, removal, transportation and disposal by the relevant municipality.

¹ Excluding contaminated or infectious health care waste

- In cases where screening² is undertaken at workplace/construction site, waste generated is treated as Health Care Risk Waste (HCRW)³ in terms of SANS 10248-1:2008.
- For HCRW, the requirements under Section B of the Guidelines apply.

6.2 TRANSNET Requirements

TRANSNET requirements for the management of Coronavirus or COVID019 Construction Site Health Care Waste (PPE) are as follows:-

- The contractor must designate a representative or waste management officer (health care waste officer) to oversee waste management⁴ on site.
- The Contractor must submit a waste management method statement, taking into account the requirements of the Guidelines issued by the Department of Health dated 30 March 2020 and the Construction Industry (where Applicable), for approval by the TRANSNET Environmental Officer prior to undertaking such activity on-site.
- All approved waste management method statements for existing sites must be revised to accommodate the management of Coronavirus or COVID-19 health care/risk waste.
- Plastic bags or bio-bins **(as per section 7 of SANS 10248-1:2008.)** shall be used for containing general health care waste and health care risk waste across all construction sites.
- Plastic bags and bio-bins shall be clearly labelled and visible with indelible markings.
- The Contractor's Environmental Officer shall ensure that all personnel deposit general health care waste and health care risk waste in appropriate bins/plastic bags.
- The plastic bags or bio-bins shall be managed so that no waste can be blown from the bin and/or bag/s and no bin or bag/s must be overfilled **as per section 7.1.3 of SANS 10248-1:2008.** The plastic bags and bins shall remain closed and only opened to deposit new health care waste.

² Testing for COVID-19 either at the Isolation room and/or by undergoing swab tests at the health care facility excluding standard screening at the entry point of workplace.

³ Any used PPE from workplace/construction site isolation room and or Health care facility.

⁴ All activities, administrative and operational, involved in handling, treatment, storage, recovery, and recycling of healthcare general waste and the disposal of waste, including transportation.

- The removal of health care waste shall only be conducted by a contracted service provider for all construction sites and site offices.
- Records on quantities of general health care waste and or health care risk waste generated on each site must kept in the Environmental File and onsite at all times.
- The Contractor must notify the contracted service provider for the disposal of health care waste, once the plastic bags or bio-bins are full. Under no circumstances will general health care waste be permitted to be stored on-site longer than 90 days.
- Health care risk waste (HCRW) from the isolation room and or health care facility shall not be stored on site for longer than 72 hours and shall be managed as per Section B of the guidelines.
- The contracted service provider shall provide proof of disposal of health care waste (Waste Manifest) indicating method of transportation and waste management facility for treatment and/or disposal.
- Keep all records related to management of health care waste on site.

7. RECORDS

- 7.1** Waste Management Method Statement – COVID-19 Healthcare Waste Plan
- 7.2** Training and Awareness Register – COVID-19 Healthcare Waste Management Procedure
- 7.3** COVID-19 Healthcare Waste Register
- 7.4** COVID-19 Healthcare Waste Manifest

8. ANNEXURES

- 8.1** Department of Health - Guidelines on Management of Coronavirus or COVID-19 Health Care Waste
- 8.2** SANS 10248-1-2008 – Management of Healthcare Waste: Part 1 – Management of Healthcare Risk Waste
- 8.3** DEFF: Draft Regulations on Health Care Risk Waste April 2018 published for comment under section 69(1) b, (g), (h), (r), (s), (dd), and (ee) read with sections 72 and 73 of the National Environmental Management: Waste Act, 2008, Act No.59 of 2008.
- 8.4** Construction Environmental Management Plan (CEMP) ENV-STD-001
- 8.5** Standard Environmental Specifications (SES) ENV-STD-002
- 8.6** Project Environmental Specification (PES)