

WISH Guidance

RMAS Consultation Response

Gloves

- For Trade Waste - should be nitrile or latex for the Trade Waste collection teams due to risk of cross contamination.
- For Collection Crews: Disposable gloves can be put on per uplift so as to reduce any risk from touching the bins and then disposed of in the back of the TRV after bins emptied.

Absence Rates

- 10 - 30% seems very low and optimistic. Many operators facing absenteeism of 40%.
- Staff number pressures are orientated to statistical consideration of infection rates and do not take into account the current psychological climate which is likely to worsen leading to worker absence.

COVID -19 Contaminated Materials

- Relies on guidance to the public to double bag and store for 72 hours before putting out for collection if from an infected household – expecting this practice consistently is unrealistic and cannot be relied on leading to a conclusion that we need to address this material handling risk in other ways.
- The guidance does not acknowledge how public behaviour during this period might result in cross contamination of bins (for example domestic residual in recycling bins etc.) increasing material handling risks to workers on picking stations. This is particularly likely if regular collections are disrupted.
- Risk of Infection - Due to the now recognized resilience of Covid-19 on specific material surfaces such as plastics, cardboard and metals we consider it unacceptable to place workers at the additional risk of manually picking domestic recyclates during this period.
- We do not consider waste collection to be a specific contact risk for Covid-19 risk nor do we consider picking lines for industrial skip wastes to be a particular contact risk for pickers. The 2m distancing requirement should remain for workers on these lines.

Social Distancing

- The 2m rule is addressed but inconclusively. The guidance seems slightly contradictory. We should not consider the risk of continually being unable to maintain social distancing as low, given it is the main tool we have to reduce infection rates.
- We must learn to work with this distancing during this period of time and maintain the ability for individuals to maintain their proximity to fellow workers as far as possible. It presents an unnecessary level of risk of transmission to the individual workers and further risks spreading the virus.
- The guidance is also quite mechanistic in its approach and fails to take staff behaviour into account. In picking stations for example even small failures in self-protection measures could lead to infection.
- In general terms there is already a major reaction ongoing leading to major staffing pressures across public and private sector operatives. However if the 2m distancing guidance can be strengthened, the actual risks communicated clearly and honestly, it provides a good basis for urgently needed clarity.

Other Points

Pages 4 and 5: Clarification re consistency in terms of if, and when individual staff members or teams of staff need to be sent home to self-isolate there appears to be conflicting advice on pages 4 and 5.

Page 13: Weigh Bridges - Suggest that the regular cleaning should include any clipboards on which paperwork is handed between the weighbridge office and the vehicle driver and any pens provided by the weigh bridge.

