

Pharmacy Waste Management - Post Payment Verification

Information Sheet

No.	Issue / Question	PPV action taken / Response
1.	Do I have to register T28 Exemption?	To denature your own controlled drugs you are required to register T28 Exemption with Natural Resources Wales – this exemption is valid for three years.
2.	Is a T28 required if a practice only denatures patient returns?	No , in these circumstances a T28 is not required
3.	Are separate waste codes provided for patient returns and practice own out of stock?	Yes, SRCL provide separate waste codes and where there is capacity within the practice it would be best practice to consign these separately under the applicable code.
4.	How often am I required to complete a pre-acceptance audit?	You are required to complete a pre-acceptance audit for the hazardous waste collection contractor every five years. The five year period runs from the date you completed and submitted your previous pre-acceptance audit.
5.	How long am I required to keep hazardous waste consignment notes?	You are required to keep hazardous waste consignment notes for three years.
6.	I do not have any producer quarterly returns.	Your waste contractor will only send you a producer quarterly return when you have consigned hazardous (cytotoxic/cytostatic) waste medicines.
7.	How long am I required to keep controlled waste transfer notes?	Controlled waste transfer notes issued for the collection of trade waste are to be retained for two years.
8.	Do I have to have a site register?	It is good practice to retain a site register for all your waste management documentation e.g. policy/procedure, consignment notes, pre-acceptance audits etc.

9.	Should waste medicine boxes/bins be labelled prior to collection by the waste contractor?	Yes, all waste should be initialled and dated on opening and closing and be labelled with the appropriate EWC code, practice details (e.g. pharmacy name and address) prior to being collected by the waste contractor.
10.	What are in-house audits?	In-house audits are regular check carried out by the pharmacy to ensure compliance against waste management legislation. Completed in-house audit checks should be retained in the practice site register for future inspection.
11.	The Incorrect inclusion of non Hazardous waste (Advice)	<p>Contractors should ensure that outer packaging (cardboard) is removed from blister packs prior to disposal.</p> <p>Removal of medicines from blister packs is not required.</p> <p>Any patient identifiable information should be obscured when the packaging is disposed of.</p>