



Update on the H&S challenges facing LA's in the 'simpler recycling' era

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In the next 10 minutes or so....

- The wider picture of fatal and serious accidents in the sector
- Causes and prevention
- Waste Fires in RCV's
- The current status of WISH documents

The logo consists of a solid green rectangle with the word "WISH" written in white, bold, uppercase letters inside it.

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Fatal Accidents in W&R.

- Quality of data subject to a wide range of limitations (especially HSE stats)
- Five year rolling average (HSE) 2018 – 2022 (inclusive) 4.4
- In 2023 there were 11 fatal accidents in the sector.
- In 2024 there were 12 fatal accidents in the sector
 - 31st Jan Child struck by reversing RCV (Scottish Borders)
 - 1st Feb Struck by reversing 360 excavator (Shropshire)
 - 8th Feb Struck by falling containment wall block (Greater Manchester)
 - 1st Mar Child Struck by reversing RCV (Edinburgh)
 - 19th Mar Crushed between excavator and trailer (Kent)
 - 6th Apr MoP death following fall at HWRC (Surrey)
 - 10th May Crushed in compactor presumed in bin (Notts)
 - 8th July Entrapped in Machinery (South Wales)
 - 17th Oct Crushed by machinery (Fife)
 - 31st Oct Entrapment/crushed by machinery (Fife)
 - 18th Dec Struck powerline while collecting skip (Essex)
 - 22nd Dec Homeless person reversed over in alleyway (London)

Fatal Accidents in W&R.

- In 2025 there were 13
 - 7th Feb Struck by falling bale at MRF (Kent)
 - 27th May Operative crushed by vehicle roll back (Devon)
 - 24th Jun Struck by Road sweeper (West Yorkshire)
 - 1st Jul Trapped/crushed (West Midlands)
 - 29th Jul Trapped/entangled in binlift (Isle of Wight)
 - 7th Aug Struck by vehicle during sorting on the floor (Greater London)
 - 1st Sep MoP killed by reversing RCV (Conwy)
 - 5th Sep Operative killed by reversing HGV in scrapyard (Widnes)
 - 18th Sep Crushed by waste metal (Greater Manchester)
 - 20th Sep Person killed in waste recycling trommel (Norfolk)
 - 31st Oct Person in bin crushed and later died (Northampton)
 - 11th Nov Passenger in RCV killed and other injured when RCV collided with building (Leominster)
 - 16th Dec MoP killed by reversing RCV (Lancs)
- In 2026 (so far)
 - 7th May Operative killed by impact with FLS (Greater London)
- Reported RIDDOR and lost time accident rates for 2024 were down on those reported for calendar year 2023. 2025 Rates look similar to 2024's.
- No obvious trends or patterns.

Factors in major accidents and fatalities.

- Workplace transport (highest proportion of fatalities c30%)
- Entangled/entrapped in machinery
 - Fastest rising factor in fatal accidents
 - 28% of major injuries
 - At least 2 fatalities in bailers/shredders every year in the last five years
- Slips trips and falls on the level (20% of major injuries, not a factor in fatalities).
- Falls from height (10% of major injuries)
- Loss of situational awareness the most significant factor in fatal accidents (CIWM/HSE study)
- “Explosive” events rare but increasing
 - Cylinders LPG, N₂O, propane, butane, aerosols
 - Lithium batteries in waste and WEEE
 - Anaerobic digestion



Workplace transport

The key issues aren't new and haven't changed:

- Workplace traffic routes and layout which:
 - Segregate (by PHYSICAL barriers) pedestrians and vehicles
 - Minimise/avoid the need for pedestrians to cross traffic routes
 - Exclude the need for pedestrians and vehicles to share the same working area and
 - Where this cannot be avoided strict controls must be put in place.
 - **SUPERVISE/MONITOR/ENFORCE**
 - See WASTE09, WASTE18
- Working with collection vehicles
 - Routes and collection points should be risk assessed - single side collection, avoiding reversing. See WASTE23, INFO11
 - Training and procedures should be in place, **supervised, monitored and enforced** see WASTE04
 - Parking and manoeuvring in the yard/depot should also be risk assessed.
 - ALL reversing should be undertaken with a Reversing Assistant if one is available (very limited exceptions) see INFO11
 - **A Reversing Assistant is NOT a banksman!**



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Machinery Safety

The key issues aren't new here either:

- Isolation, Lock Out and Tag Out (LOTO):
 - All machinery should be fitted with devices to enable isolation and lock out (no exceptions)
 - NO work (including blockage clearance) should be undertaken unless machinery is locked out and isolated in accordance with a formal LOTO system.
 - Special measures should be in force for maintenance/repair work which requires in running adjustment
 - **SUPERVISE/MONITOR/ENFORCE**
 - See WASTE29, WASTE13 (MRF's)
- Guards, interlocks and other physical controls
 - The guarding hierarchy MUST be applied (fixed guards, interlocked guards, moveable guards, with procedures and training last and least)
 - Safety by distance/position should NOT be relied upon
 - See Waste33 (machinery safety principles) and INFO's 20, 21, 22, 24 and 27.



Dangerous items in the waste stream

- Flammable gas cylinders (Propane, LPG, Butane)
- Aerosols especially in large numbers from house clearances and commercial sources
 - Collection vehicles
 - Reception halls and CA sites
 - Shredders and compactors
 - Bailers
- Nitrous Oxide (N₂O) cylinders
- Fire extinguishers
- Marine flares and other pyrotechnics

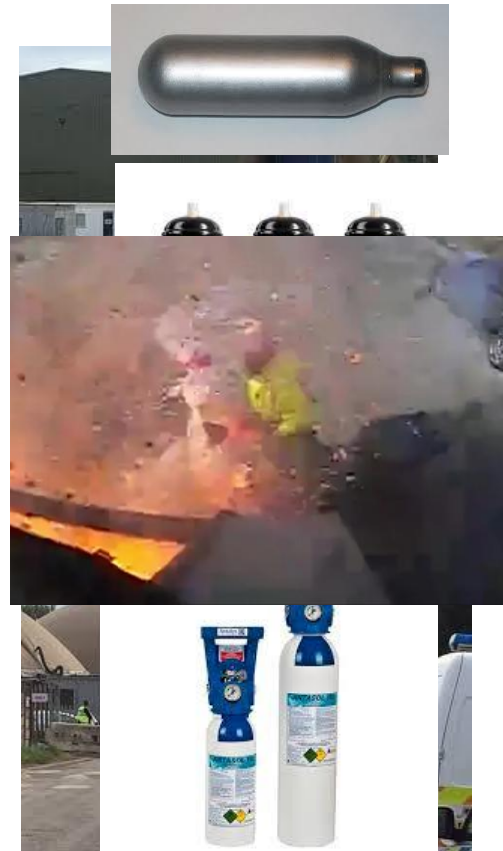
High energy density batteries (Lithium included)

- Vapes (disposable or otherwise)
- From WEEE

See WASTE03, WASTE26, INFO08

Fires and Explosions (due to the above or other factors)

- See WASTE28
- AD plants

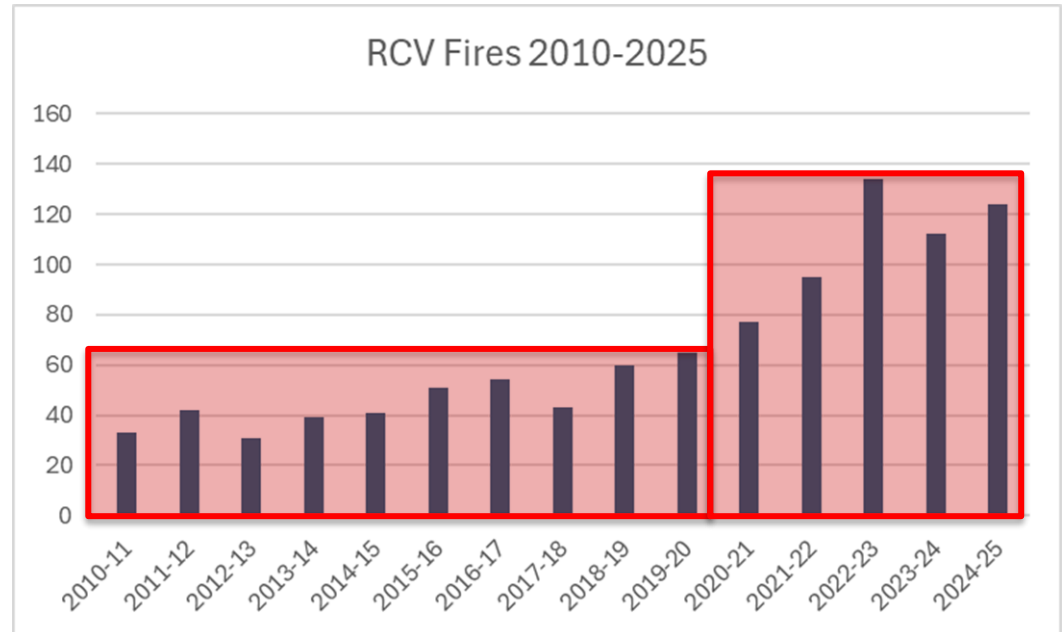


RCV fires - Incidence

Until very recently there was no historic data
Anecdotally there were said to be 2 -3 per year in each major waste company

Currently

- Veolia, Suez, Biffa 1 per day (UK wide)
- FCC 1 every 2/3 days
- Rough estimate 4-5 per day



Total incidents: 1001

15 Year average: 67

10 Year average: 81

5 Year average: 108



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What do we do with an RCV fire?

There's no simple answer – there are too many variables

From experience most of the larger private sector companies and Local Authorities give much the same guidance to their drivers and crews.

- In general, if safe to do so drive to a place as far away from buildings, people and other vehicles as practical and park.
- Get all crew members out of the cab and phone the fire brigade.
- **Do not eject the load** until the fire brigade arrives (ejecting the load may well provide more air to the fire); **unless**
 - the location is really isolated and well away from people, buildings, trees or other combustible materials etc;
 - The driver is able to eject the load without exposing himself to unnecessary risk (i.e. the load can be ejected by the driver operating from the cab and the fire is not sufficiently well developed to present any risk of preventing him from escaping from the cab. The cab doors should be left open throughout any ejection attempt and the driver ready to abandon the cab should that become necessary) **AND**
 - There is sufficient space to move the vehicle at least 10m from the load once ejected.

Experience shows that ejecting the load without active fire suppression in place does not always reduce damage to the vehicle. This is because (i) sudden exposure to oxygen can cause an otherwise smoldering fire to become a full developed conflagration with much higher temperatures. This can happen very quickly indeed. It is often not possible to move the vehicle away from the ejected load quickly enough to avoid exposing the raised hopper, and the flammable liquid bearing hydraulic hose systems that it contains, to temperatures where the hoses melt and spray hydraulic liquid under pressure into the fire; and (ii) in the absence of access to an oxidizer (e.g. air) fires in the main body tend to smolder at much lower temperatures which significantly reduces vehicle damage.

Please note that these are very general observations and the individual circumstances (the nature of the fire, the type of vehicle, the location its environs... etc etc) can vary so widely that it really does come down to a very dynamic risk assessment being done by the driver at the time.

To guide the drivers assessment I would suggest going through the above with drivers during their training, emphasizing the points that

- **Life safety ALWAYS comes first;**
- Drivers should only stay with a hot load (i.e. drive with it) for the minimum amount of time possible; and
- Drivers should only return to a vehicle which is smoldering or on fire if instructed to do so by the fire and rescue services and/or they can maintain a safe escape route should fire develop suddenly into a larger conflagration.



Fires in RCV's

- New WISH Working group has been formed with the aim of:
 - Bringing together operators, F&RS, Regulators and others
 - Pooling knowledge and understanding of the causes of fires in RCV's; the different types of fires and ways in which vehicles can be affected; what fire fighting techniques have been tried on which types of RCV fire and their effectiveness
 - Drafting WISH guidance for RCV operators on how to prevent fires, what training and instructions should be given on how to respond to a vehicle on fire (analogous to WASTE 28); and
 - Drafting new National Operational Guidance and agreeing with Fire and Rescue services (through the NFCC) a shared approach to dealing with RCV fires
- The working group includes representatives from a number of fire and rescue services, the National Fire Chiefs Council, EA, NRW, SEPA, HSE, ESA, private sector operators, LARAC and APSE among others.
- The first meeting took place in November with follow ups in January and March 2026. The group are currently gathering data on incidents and on the effectiveness of the various fire fighting techniques and approaches.



WISH documents.

“WASTEXX” “Formal Guidance documents”

- Focusses on the standard to be met.
- Equivalent in law to an HSE “Approved Code of Practice”
- Fully endorsed and approved by HSE, DEFRA etc
- *Onus Probandi* (“burden of proof”) is on the accused to prove that what they did was at least as good as stated in the WASTEXX formal guidance

“INFOXX” “Information sheets”

- Provides information about how the standard established in the WASTEXX formal guidance can be achieved
- Equivalent in law to HSE “guidance”
- HSE/DEFRA etc are consulted, but do not formally endorse or approve
- *Onus Probandi* is on the prosecution to show that what the defendant did was not as good as stated in the INFOXX information sheet

“REFXX” “References and support documents”

- Forms, case studies, document templates, training videos that can be downloaded and freely used (but CANNOT be used and sold for commercial purposes)
- No standing in a Court of Law
- Cannot be submitted as evidence of either an applicable standard or the normal industry practice.

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Current status of WISH documents.

LIST OF WISH GUIDANCE, INFORMATION AND REFERENCE DOCUMENTS

Under review and/or due a review and/or new document being produced by a WISH or other work group								
Formal guidance documents								
REF 05	Summary key occupational health hazards and references	List of key potential occupational health hazards, potential symptoms, and links to information. Support document to WASTE 30	Sep 19	V1	NA	N	N	Still relevant
REF 06	Waste plastic fire separation distances case study	Case study of a real waste plastics fire confirming separation distances calculated in WASTE 28 Reducing fire risk	Sep 17	V1	NA	N	N	Still relevant
REF 07	Archive - example checklists COVID-19 and waste management	Archive version of support document to INFO 13 containing checklists for employers to check their controls against COVID-19 risk	Oct 2023	V3	3 Jul 20	N	N	Archive version of previous reference sheet
REF 08	Example mobile plant daily periodic checklist	Support document to INFO 19 on mobile plant operative training. Example of a daily/periodic checklist for mobile plant operators	Jul 2021	V1	NA	?	?	See above on INFO 19. Keep for now
REF 09	Example mobile plant operator training record	Support document to INFO 19 on mobile plant operative training. Example training record form for mobile plant operators	Jul 2021	V1	NA	?	?	See above on INFO 19. Keep for now
REF 10	Archive – COVID 19 and waste management operations	Archive version of INFO 13 to allow the information provided to stay in the public domain	Mar 2022	V1	NA	N	N	Archive version of previous information sheet
REF 11	Governance for joint venture WISH documents	Process and governance to be followed for joint ventures between WISH and other bodies to produce WISH documents	Feb 2023	V1	NA	N	N	Recent document - 2023
REF 12	Black bag splitting at HWRC/CA sites	Text from HSE position statement on black bag splitting at HWRC/CA sites. Includes hazards to be considered	Nov 2023	V1	NA	N	N	Recent document - 2023
REF 13	Automatic bin-lifts FAQs sheet	FAQs sheet of commonly asked questions on automatic bin-lifts. Support document to INFO 26	Sep 2024	V1	NA	?	?	To be kept under review
REF 14	Back to basics guide – containment walls	Basic practical information on bunker and other similar containment walls. Support document to WASTE 32 for SMEs etc	May 2025	V1	NA	N	N	New document 2025
DRAFTS								
REF XX	WISH FAQs – commonly asked questions and the answers	Including, fires in collection vehicles, wearing shorts, safe distances to carry wastes during collections etc		V1	NA	Y	Y	Being draft from existing web FAQ's

The future..

- POPS and PFAS. HSE study has just concluded, expect information and guidance in 2026
- CCTV combined with pattern recognition and AI producing some interesting solutions for workplace transport and machinery risks.
- Further fires research outcomes on autoignition and deep fires in piles and bunkers
- Safety in collection vehicle design (especially mini-freighters)

What about 'simpler recycling'?

- The activity types aren't different – there's just more of them.
- Traditionally the overall risk of an activity is calculated from:

Probability (Likelihood) **X** Potential severity (Hazard, potential for harm)
- What gets forgotten is *Frequency*
- Do the same thing often enough and even low probability events WILL occur.
- ... and 'Simpler Recycling' involves more vehicles, more collections, and more processes exactly like those which led to the fatal outcomes listed at the start.

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