Response From the Chartered Institution of Wastes Management

Development and Implementation of a Three-Year Strategy to Improve Data across all Waste Streams in the UK - Defra Consultation

<u>**Principal Comments**</u>

The Chartered Institution of Wastes Management (CIWM) welcomes and supports the proposed strategy to improve the generation, management and use of waste data. The lack of reliable, timely and complete data has been a serious barrier to more sustainable wastes management across the UK. We look forward to the outputs from this data strategy but do not underestimate the size of the task to design and implement it, for all of the parties involved.

CIWM does not share the Defra and Agency view that the strategy will work adequately on a voluntary basis. Responsibilities to provide accurate, complete and timely data need to be made clear to waste producers and waste managers and need to be made statutory with appropriate penalties for failure to comply. Clearly the submission of high quality waste data by the majority of businesses on a voluntary basis, as envisaged, would be a good step forward. However, failure to supply data by any part of the industry could be fatal to the short term usefulness of the information and to the long term commitment of the rest of the industry. Defra are considering updates/improvements to the Duty of Care and aspects of the waste permitting regimes. These reviews could provide the opportunity needed to give this waste data strategy the statutory support it needs.

The data strategy is ambitious, leaving a high risk of delay, failure or loss of support. The proposed strategy timetable is based on best possible performance (e.g. by the Environment Agency); the risks identified in the project outline are significant and not in the direct control of the project; and the degree of detail needed in waste coding and reporting will almost certainly prove problematic – at least in the short term. The success of the strategy depends on a high level of buy-in from a range of stakeholders and care should be taken to launch the strategy such that its credibility is protected. This need for caution needs to be balanced against the clear need for early reliable data. Phased implementation will be essential and should include field pilots of the proposed coding and reporting systems and flexible database and reporting systems. These should be designed to generate information adequate to satisfy UK reporting obligations in the first place and be easily extended to more detailed data and more materials/activities as experience is gained. Experience with the 1996 Special Waste consignment system and SWaT database show it is easy to design a complex system. It has proven much harder to deliver such a system and even harder afterwards to change advice and requirements for all those who have to use it.

The credibility of the data strategy will hinge on the ability of the Agency and proposed data Hub to receive, validate, clean and disseminate the data reported by the industries. The resources needed to build, introduce and operate the system – including people, skills and IT must be guaranteed at the start of the project.

Further guidance on the definition of 'waste' and particularly the definition of 'recovery' will be needed to clarify which activities and businesses will have obligations to report waste data.

The quality of data envisaged, including the detail of waste coding, will need new skills in the waste producing and waste management industries. CIWM would be pleased to discuss with Defra and others what skills may be needed and how they may be provided for through training, guidance or information provision.

Despite these concerns CIWM recognises the importance of this strategy and is committed to working with Defra and other partners to develop, introduce and maintain it.

The consultation document raised a number of detailed questions. These are addressed below where appropriate. Some questions appear to cover similar ground or elicit similar comment from CIWM and have therefore not been included in this response.

Q1: Do you agree that these are the key priorities for data collection, storage and dissemination across all waste streams. Do you have any modifications to make?

In general the priorities indicated are the right ones.

Dependence on the European Waste Catalogue means that the data will need to be backed up by waste *composition* analysis e.g. for municipal waste or wherever 'catch all' codlings are proposed to be used.

The strategy makes no reference to the data collected by CIPFA regarding local authority waste performance. It should be made clear whether it is intended to supersede the CIPFA exercise through this strategy or whether there is any additional merit in the information which they collect.

Waste producers' responsibilities for provision of information should be made clear as they are usually in by far the best position to have a clear view of what materials they are discarding. As a minimum the strategy should underline waste producers' responsibilities under the Duty of Care to properly describe their wastes including putting waste managers in a better position to report on the types and quantities of waste they have managed.

The reporting proposals are ambitious and it may be some time before all industry is in a position to report to the required standard and on time. The phased implementation should start from analysis of what is needed out of the system earliest.

Guidance on reporting will need a link into further guidance on the definition of 'waste' as this dictates which materials and activities are caught by the reporting responsibility. This is especially important where the definition of 'waste' or 'recovery' may be subject to change under either EU or UK policy.

Q2: Do you agree in principle that the above approach to data collection is appropriate, and if not can you identify alternative approaches and the advantages they would provide?

CIWM strongly supports the proposed central co-ordination for this system. However, it is essential that both the regulator and the data Hub are fully resourced to take on their data responsibilities. Any failure to collect, validate, store/transfer and provide this information efficiently and effectively will seriously damage stakeholder buy-in to this strategy. The resources and skills needed to do the job and preparation time needed are all too easy to underestimate.

Devolved Government buy-in to the strategy and its systems is also essential. Neither data suppliers nor data users will appreciate different systems or data standards/definitions across internal UK boundaries

Defra and the Agency accept that familiarity with, and use of, the system will grow over time. They suggest that an 80/20 rule could be applied to businesses who will/will not make

appropriate returns. However it is easy to predict that the 20% of businesses who choose not to report will be concentrated in strategically important activities – including many exempt from licensing. This will only prolong some of the most serious gaps we already have in waste data and information. Defra should anticipate this issue and seriously consider giving waste data reporting statutory backing – possibly through the proposed revision to the Duty of Care.

Q3: Do you agree that our approach to storing and disseminating data should be developed as proposed?

The data should be kept and checked by an independent body. Checking should include quality assurance of supplied data – e.g. incorrect units used or missing decimal points and should be validated either through cross check with alternative data sources e.g. landfill tax payments or regulator information. It is also unclear where data QA and validation should be done. Some of it could be best done relatively locally where the information still has some meaning. Experience with the Agency's SWaT special waste database shows that validation of data by personnel completely unaware of the activity or site it comes from is seriously flawed.

Commercial confidentiality will be an issue for many data suppliers – especially regarding operational or customer database information. Clearly the data and reports will be subject to the Environmental Information Regulations anyway, but Defra should clarify at the earliest opportunity how commercial confidentiality could affect data providers and users.

System and strategy credibility and stakeholder buy in hinges on full resourcing for the Hub and Agency. Equally, given proper resources and time to prepare, both Hub and Agency must commit to a specific level of service.

CIWM agrees that no legacy data should be added.

Q4: Do you have any comments on the proposed approach to data standards ?

The waste coding envisaged is detailed and complex. Practitioners warn that this will take time and care to introduce and that some of the detail could be impractical. CIWM therefore urges early field trials of the coding system in particular to avoid either over specification of detailed coding or over reliance on the use of generic mixed waste codes.

Q5: Do you have any comments on the principle of a phased approach to implementation?

This is an ambitious project and a phased introduction is essential. Defra have a difficult balance between the urgent need for data to satisfy reporting obligations and for strategy development/monitoring against the need for time to properly prepare and commission the systems needed and to allow all data providers to be ready to supply high quality and timely information. Experience with other waste data systems – e.g. SWaT show that early data is often inadequate to support the detail of reports desired. The first priority for data collection should be to satisfy EU reporting obligations.

Q6: Views and comments are welcome on the development of the proposed 3-year national waste data strategy, in light of the potential benefits this would deliver.

A three year strategy is essential in view of the size and complexity of the proposal. It is likely therefore that some waste sample surveys may be necessary for the immediate future before Hub data is good enough to support proper reporting. Compositional waste analysis will also still be needed wherever any general code is relied on.

Q7: Do you have any comments on the proposed IT systems architecture?

It is assumed that the Agency will have a common system for data reporting/collation and appropriate resources and skills to receive, QA/validate and supply information to the Hub. Without this resource the strategy will struggle.

Q9: Do you agree with the suggested user categories? And do you have views on the likely volume of usage, and the capacity of the IT systems to support this demand?

CIWM members suggest the estimated numbers of users is likely to be low. The data will be important to academia, waste producers, and R&D as well as broad use within the waste industry. The system will also be subject to peak demand and needs to be capable of handling future growth – if it is a success, then many people will want to use it!

Q11: Views are welcome on the kinds of reporting facilities that potential users would find helpful. Are there any important requirements for accessing data in addition to those identified above?

An important lesson learned from development of Waste dataflow and SWaT is that it is important to know what reports will be required before designing the database. A listing of the envisaged standard reports proposed would be useful plus an analysis of possible future reporting needs e.g. any specific to Scotland/Northern Ireland or for newly separated waste streams such as batteries.

It is assumed that the Hub will control future change management as proposals for new reports and changes to the data/structure are proposed. We also assume that the Hub will keep standard reports on file to avoid repeat report preparation of the same data for multiple standard inquiries.

Q14: All views and comments on the proposed arrangements for data classification and coding are welcome.

The detailed coding of wastes is ambitious and will be a significant challenge for many businesses – especially those operating under exemptions or for businesses managing mixed commercial waste for example. An early field trial is definitely needed to pilot the proposed coding.

Q17: Are there the right sorts of reporting facilities in relation to waste management data? Do you have any suggestions for alternative reporting facilities which might be included?

Reporting facilities will need to accommodate 'residuals' from waste collection and processing such as bottom ash from energy from waste facilities and rejects from MRF/MBT plant.

Q26: Views and comments are invited on the proposed time scales and data collection issues described above

The strategy itself is timely and the information it will deliver urgently needed. However, the timing of the project itself appears optimistic. Strict prioritisation is needed in terms of data collection and reports needed.

Q27: Do you have views on the kinds of support that industry and other external users would require?

Both waste producers and waste managers – of all sorts - need training and guidance in coding and reporting. The value of the entire system hangs on the quality of data provided in the first place. Experience with the Agency's SWaT database shows the damage and hard work involved in system clean up when poor data is entered. CIWM anticipates a strong demand for this type of training and would be pleased to discuss the specification and delivery of this training with the Department.

Q28: Do you have comments on the proposed system development costs outlined above?

The suggested costings look optimistic given the size and complexity of the project and system. It is not clear if the cost of routine maintenance, disaster recovery or future upgrade has been included, and it is not clear whether the project envisages the use of a single or multiple servers.

The partial RIA does not take adequate account of the costs to waste management operators in preparing for and operating the proposed new system.

Full funding of the Agency and Data Hub are essential to provide proper systems, hardware, staff and skills needed to receive, process and provide access to this data. Re-engagement of stakeholders in this strategy will prove to be harder than gaining their support in the first instance.

Q29: Do you have comments on the proposed implementation plan?

Very ambitious. Implementation will require strong leadership and a 'waste data champion', together with a high level of 'joined-up thinking'. Reference to various joint working groups should not be allowed to build bureaucratic castles which lose sight of the real aims and objectives of the waste data strategy.