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Llywodraeth Cymru
Welsh Government

Introduction of Mandatory Digital Waste Tracking

Summary of responses

December 2022



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Introduction

From 21 January 2022 to 15 April 2022, the UK government, Scottish Government, Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland, consulted jointly on the introduction of mandatory digital waste tracking. Whilst waste policy is a devolved matter, the UK government and devolved governments have agreed to work together to develop a UK wide waste tracking service to provide a seamless system across the UK.

The UK is committed to moving towards a more circular economy, meaning we keep resources in use for as long as possible, extract maximum value from them, minimise waste and promote resource efficiency. To do this we must ensure we have information about what waste is being produced and where it ends up. There is currently no single or comprehensive way of tracking this waste, with large amounts of data either not collected or not collated centrally.

Joining these fragmented systems up and replacing paper-based record-keeping through digital waste tracking will make it easier and less time consuming for legitimate waste companies to comply with reporting requirements, whilst making it much harder for rogue operators to compete in the industry and commit waste crime including fly tipping, deliberate misclassification of waste, illegal waste exports and the operation of illegal waste sites.

The Environment Act 2021 provides governments across the United Kingdom with the powers to introduce regulations to establish an electronic system for tracking waste and the consultation sought thoughts on our proposals for this.

Number of Responses

In total 713 responses to the consultation were received, 662 through citizen space, 48 by email and 3 by post. Of the responses submitted by email and post, 40 directly addressed the consultation questions and 11 were general responses. For the purposes of this summary, only those that directly addressed the consultation questions have been summarised. Therefore, this summary is based on 702 responses.

All responses will be considered when drafting the joint UK Government Response to the consultation.

Please note that throughout this summary, percentages are rounded to the nearest whole number. This means that percentages do not always add up to 100. Responses to each question were looked at both overall and broken down by respondent type. There were no questions where one type of respondent was overwhelmingly represented in a particular choice of answer.

Table 1 - Responses to the consultation by method

Response method	Number of responses received
Citizen Space	662
Email	48
Post	3
Total	713

About the Respondents

Responses were received from organisations operating in each of the four nations. There were 588 responses from organisations operating in England, 164 from organisations operating in Wales, 182 from those operating in Scotland, and 98 from Northern Ireland. 7 respondents did not provide an answer to the question asking where they operated. This adds up to more than 702 as respondents could choose more than one nation.

Table 2 - Number of respondents operating in each Nation

Nation of the UK	Number of respondents	Percentage of respondents
England	588	85%
Northern Ireland	98	14%
Scotland	182	26%
Wales	164	23%
No response	7	1%

Respondents were also asked the category of respondent which they felt best represented them. It is important to note that respondents self-identified as belonging to each of these groups, and that no verification has been conducted. Table 3 shows the number of responses for each respondent type.

Table 3 - Breakdown of how respondents self-identified

Respondent type	Number of respondents	Percentage of respondents
Business representative organisation or trade body	77	11%
Waste site operator	91	13%
Waste broker or dealer	55	8%
Waste transportation company or carrier	123	18%
Waste producer	123	18%
Product manufacturer	18	3%
Local authority	82	12%
Community Group	1	Less than 1%
Non-governmental organisation	6	1%
Charity or social enterprise	8	1%
Consultancy	17	2%
Academic or research organisation	8	1%
Member of the public	27	4%
Other	64	9%
Not answered	2	Less than 1%

Table 4 shows the number of each respondent type that operate in each of the four nations, and the percentage of that type of respondent within each nation. Not all respondents answered the question about respondent type, so numbers may not add up to the total number who stated that they operate in that nation (shown in Table 2).

Table 4 - Breakdown of respondent type within nation*

Respondent Type	England number	England %	Northern Ireland number	Northern Ireland %	Scotland number	Scotland %	Wales number	Wales%
Business representative organisation or trade body	64	11	23	23	41	23	33	20
Waste site operator	74	13	14	14	30	16	23	14
Waste broker or dealer	55	9	10	10	14	8	15	9
Waste transportation company or carrier	115	20	11	11	18	10	19	12
Waste producer	101	17	7	7	30	16	31	19
Product manufacturer	14	2	2	2	2	1	0	0
Local authority	59	10	7	7	11	6	5	3
Community Group	0	0	0	0	0	0	1	1
Non-governmental organisation	4	1	3	3	3	2	2	1
Charity or social enterprise	7	1	5	5	6	3	5	3
Consultancy	17	3	3	3	3	2	4	2

* Due to rounding not all percentages add up to 100

Respondent Type	England number	England %	Northern Ireland number	Northern Ireland %	Scotland number	Scotland %	Wales number	Wales%
Academic or research organisation	7	1	1	1	1	1	1	1
Member of the public	17	3	2	2	5	3	6	4
Other	53	9	10	10	18	10	19	12

Responses by Question

Respondents to the consultation could answer as many or as few questions as they chose to, so not all questions received 702 responses.

Questions 1 to 3, and 6, covered administrative questions (name, contact details, confidentiality, and interest in the user panel).

Questions 4 and 5 are covered in the 'about the respondents' section of this summary.

Question 7: Do you agree or disagree with the waste types we are proposing to be tracked?

Respondents were asked to agree, disagree, or choose no opinion. If they chose 'disagree' they were asked to tell us why.

There were 688 responses to this question. Of those, 79% agreed, 16% disagreed, and 5% chose no opinion.

142 respondents provided further details. As well as some general opposition to the proposals, concerns included: increased burden on businesses (particularly small businesses), queries around how the proposals would apply to tradespeople who visit domestic homes, and concerns about the proposals excluding animal by-products.

Question 8: Do you agree or disagree with our proposals for which waste activities will be recorded in the waste tracking service?

Respondents were asked to agree, disagree, or choose no opinion. If they chose 'disagree' they were asked to tell us why.

There were 691 responses to this question. Of those, 73% agreed, 21% disagreed, and 6% chose no opinion.

172 respondents provided further details. As well as some general opposition to the proposals, concerns included: potential for increased burdens to businesses, the inclusion of waste moving between sites operated by the same party, and queries about how recording treatment on site would work in practice.

Question 9: Do you agree or disagree with our proposals for when waste tracking will not be required?

Respondents were asked to agree, disagree, or choose no opinion. If they chose 'disagree' they were asked to tell us why.

There were 687 responses to this question. Of those, 71% agreed, 17% disagreed, and 12% chose no opinion.

144 respondents provided further details. As well as some general opposition to the proposals, the key theme from those responses was concern that exceptions will create loopholes that will allow abuse of the system to occur. There were several suggestions that there should be no exemptions.

Question 10: Do you have any views about how we should incorporate waste activities conducted under Non-Waste Framework Directive exemptions, Low Risk Waste Positions and Regulatory Position Statements into the waste tracking service?

Respondents were asked to choose an answer from one of the following:

- A) require full details (as in the 'Waste activities to be recorded in the waste tracking service' section)
- B) exempt them from the need to provide this further information, noting that this would present a gap in our overall waste picture
- C) have a mixture of A) and B), with some specified activities coming with a requirement to record these details and others that do not
- D) do something else to incorporate them

If they chose 'D' respondents were asked to provide further details.

There were 651 responses to this question. Of those, 39% chose option A, 14% chose option B, 42% chose option C, and 5% chose option D.

80 respondents provided further details. As well as general opposition to the proposals, there were again several suggestions that there should be no exceptions.

Question 11: Do you agree or disagree with our proposals to remove the requirement to submit information or waste data returns as listed, once the waste tracking service is live?

Respondents were asked to agree, disagree, or choose no opinion. If they chose 'disagree' they were asked to tell us why.

There were 689 responses to this question. Of those, 82% agreed, 8% disagreed, and 11% chose no opinion*.

95 respondents provided further details. These responses included concerns about reliability of the new service, with some suggesting there should be some overlap between current waste data returns and using the new service. Several respondents noted a desire for WasteDataFlow[†] style reporting to still be available.

* Due to rounding these percentages do not add up to 100

† WasteDataFlow is the online system used by UK Local Authorities to report municipal waste data to government.

Question 12: Do you agree or disagree with the information recording proposals in Table 1?

Respondents were asked to agree or disagree with a range of information recording proposals. The responses are summarised in the table below.

Table 5 - Responses to information recording proposals*

Proposal	Number of responses	Agree	Disagree	No opinion
A system-generated unique identifier	680	85%	7%	8%
Details of the person who classified the waste	676	70%	15%	15%
Details about the destination for all waste movements, including the type of authorisation held	678	84%	8%	8%
Standard Industrial Classification (SIC) Code	678	76%	10%	15%
Details of rejected or quarantined loads	674	79%	5%	16%
Details of waste treatment	677	79%	7%	14%
Persistent Organic Pollutants (POPs) identification	671	65%	11%	23%
Details of end of waste products and materials produced	675	71%	11%	18%
Information about onward destination of end of waste products or materials	678	71%	14%	15%
Nation specific requirements for any existing or future requirements	668	63%	7%	29%

221 respondents provided further details. Themes from those responses included: concern about persistent organic pollutants (POPs) and how they would be included in the service (including competency concerns about knowing whether POPs are present in waste),

* Due to rounding not all percentages add up to 100

concerns about the use of SIC codes, disagreement with the suggestion that the details of the person classifying the waste are recorded on the service (instead suggestions were that details should be at the company level), and disagreement that end of waste products should be tracked, as those respondents felt these products are no longer waste and therefore out of scope of the service.

Question 13: Persistent Organic Pollutants – how much information about POPs do you think should be recorded in the service?

Respondents were asked to choose an answer from the following;

- basic level - indication that waste contains POPs only
- enhanced level - additional details on the specific POPS contained in the waste and the content level of the POPs
- other
- no opinion

If they chose 'other' they were asked to provide further details.

There were 678 responses to this question. Of those, 40% chose basic level, 25% chose enhanced level, 12% chose other, and 23% chose no opinion.

107 respondents provided further details. The key themes of these responses were that a mixture of options would be preferred, and that there is concern about the difficulty of knowing when POPs are present in waste.

Question 14: Is there any other information related to waste management that you think should be recorded in a new digital waste tracking service?

Respondents were asked to choose yes, no, or no opinion. If they chose 'yes', they were asked to provide further details.

There were 675 responses to this question. Of those, 24% chose yes, 45% chose no, and 31% chose no opinion.

173 respondents provided further details. Suggestions for other information to be recorded included: the source of the waste (for example if it was flytipped), carrier IDs, broker details, vehicle registrations, and the recycling rate or performance levels of sites.

Question 15: Are you familiar with the existing D & R codes?

Respondents were asked to choose yes, no, or not applicable to you.

There were 674 responses to this question. Of those, 50% chose yes, 25% chose no, and 26% chose not applicable*.

Question 16: Do you find D & R codes easy to apply?

Respondents were asked to choose yes, no, or not applicable. If they chose 'no', they were asked to tell us why they find them hard to apply.

There were 667 responses to this question. Of those, 33% chose yes, 16% chose no, and 52% chose not applicable†.

94 respondents provided further details. The key theme of those responses was that D&R codes can be vague and confusing. It was also noted that the current D&R codes don't cover all activities.

Question 17: Do you have any suggestions as to how recovery or disposal activities should be recorded in the waste tracking service?

Respondents were asked to choose yes or no. If they chose 'yes', they were asked to provide further details.

There were 648 responses to this question. Of those, 20% chose yes and 80% chose no.

148 respondents provided further details. Suggestions included: expanding the list of codes to include a wider range of activities, simplifying the list of codes, providing a drop-down menu, provide more detailed descriptions of the codes and guidance on how to apply them, and to give specific options based on the permit, site, or exemption of the user. There were also concerns about the use of the codes R13 and D15‡. Some suggested removing these codes, and others suggested requiring a secondary code to be able to further specify the recovery or disposal method.

Question 18: End of waste products or materials – do you use any existing standard codes or descriptions to record end of waste products produced from waste?

Respondents were asked to choose yes or no. If they chose 'yes', they were asked to provide further details.

There were 639 responses to this question. Of those, 11% chose yes and 89% chose no.

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† Due to rounding these percentages do not add up to 100

‡ R13 - Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced). D15 - Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)

75 respondents provided further details. Aggregate standards, BS EN ISO standards, compost standards, EWC codes and SIC codes were stated as being used currently.

Question 19: Do you transport hazardous waste?

Respondents were asked to choose yes or no.

There were 667 responses to this question. Of those, 29% chose yes and 71% chose no.

Question 20: How do you currently record dangerous goods information?

Respondents were asked to choose an answer from the following - on a paper record, on a digital record, both, or not applicable.

There were 658 responses to this question. Of those, 18% chose paper record, 2% chose digital record, 16% chose both, and 64% chose not applicable.

Question 21: Where do you think information demonstrating compliance with the Dangerous Good Regulations with regards to the movement of waste should be recorded?

Respondents were asked to choose an answer from the following - in the new waste tracking service, somewhere else, or no opinion. If they chose 'somewhere else', they were asked to provide further details.

There were 667 responses to this question. Of those, 61% chose the new waste tracking service, 5% chose somewhere else, and 34% chose no opinion.

48 respondents provided further details. There weren't any strong themes in these responses, but several respondents thought the paperwork should be separate and pointed to the risk of duplication with the road traffic regulations.

Question 22: If you produce, manage or handle waste in any way, were you aware of your duty to apply the waste hierarchy prior to reading this consultation?

Respondents were asked to choose yes, no, or not applicable.

There were 682 responses to this question. Of those, 77% chose yes, 11% chose no, and 12% chose not applicable.

Question 23: Do you think waste holders including producers should record their compliance with the application of the waste hierarchy in the Waste Tracking service?

Respondents were asked to choose yes, no, or no opinion. If they chose 'yes', they were asked to provide details of how they think this should be done.

There were 683 responses to this question. Of those, 53% chose yes, 19% chose no, and 28% chose no opinion.

298 respondents provided further details. Suggestions included: the waste tracking service should include a list of the hierarchy options to choose from, or codes assigned to them that could be input, the current tick-box could be replicated in the service, that the current tick-box is useless for recording compliance, and that producers should provide evidence or statements to show compliance.

Question 24: If you are likely to need to enter data into the waste tracking service, which of the options would you use for the majority of your data entries?

Respondents were asked to choose an answer from the following:

- manual entry
- data upload from existing spreadsheet records onto a waste tracking service standard spreadsheet
- data upload from existing waste tracking software onto a waste tracking service standard spreadsheet
- direct data upload via an application programming interface (API)
- something else
- no opinion

If they chose 'something else', they were asked to provide further details.

There were 669 responses to this question. Of those, 35% chose manual entry, 16% chose data upload from existing spreadsheet records, 6% chose data upload from existing waste tracking software, 16% chose direct data upload via an API, 13% chose something else, and 14% chose no opinion.

123 respondents provided further details. A strong theme from these responses is that respondents would use a mixture of the options given.

Question 25: When recording data in your current systems, do you use any form of data standard?

Respondents were asked to choose yes or no. If they chose 'yes', they were asked to tell us what those data standards are.

There were 639 responses to this question. Of those, 20% chose yes and 80% chose no.

140 respondents provided further details. Of those responses, the most mentioned data standard was EWC codes, followed by ISO standards and data sets within Waste Data Flow.

Question 26: Do you agree or disagree with our ambition for real time recording of waste movements and transfers?

Respondents were asked to choose agree, disagree, or no opinion. If they chose 'disagree', they were asked to tell us why.

There were 684 responses to this question. Of those, 65% agreed, 24% disagreed, and 11% chose no opinion.

209 respondents provided further details. A key concern in those responses was the potential increased burden to businesses. Other concerns included the accuracy of data and the availability of wi-fi or access to the internet.

Question 27: For the following types of waste movements or transfers, how long do you think you would need to transition to real time recording?

Respondents were asked to choose an answer from the following for hazardous waste, non-hazardous waste, and green list waste imports or exports - less than 1 year, 1 to 3 years, more than 3 years, or not applicable. The responses are summarised in Table 6.

Table 6 - time needed to transition to real time recording

Waste stream	Number of responses	Less than 1 year	1 to 3 years	More than 3 years	Not applicable
Hazardous waste	651	30 per cent	32 per cent	11 per cent	27 per cent
Non-hazardous waste	656	31 per cent	40 per cent	17 per cent	12 per cent
Green list waste*	640	21 per cent	24 per cent	10 per cent	44 per cent

Question 28: What are the main barriers or motivators that will influence the time it takes you to transition to real time reporting?

Respondents were asked to describe the main barriers or motivators.

There were 526 responses to this question. In those responses, the most mentioned barriers included: cost, time, client or supplier adoption of the service, access to available technology, available resources, training, and setting up or merging existing systems. The most mentioned motivators included: an easy-to-use system, software that works and is robust, real-time reports being available, and more accurate data management.

* Due to rounding these percentages do not add up to 100

Question 29: Do you agree or disagree with the overall proposed processes as set out in Annexes A, B and C?

Respondents were asked to agree, disagree, or choose no opinion for the processes for the recording of information about waste movements proposed in:

- Annex A – hazardous and non-hazardous waste movements
- Annex B – green list waste exports
- Annex C – green list waste imports

The responses are summarised in the table below.

Table 7 - Processes for recording of information*

Annex	Number of responses	Agree	Disagree	No opinion
A - Hazardous and non-hazardous waste	659	71%	14%	16%
B- Green list waste exports	652	46%	6%	47%
C - Green list waste imports	649	44%	4%	51%

If respondents chose ‘disagree’ for any of the processes they were asked to tell us why. 129 respondents provided further details. In those responses, as well as general disagreement with the proposals, concerns included needing to be able to amend details on the service on the day of collection and queries around how waste could be tracked once exported.

Question 30: How far in advance of a waste movement should the information listed under Step 1 in each of the processes be entered onto the waste tracking service?

Respondents were asked to choose an answer from the following for Annexes A, B, and C - any time before the waste movement, at least 1 day before, at least 3 days before, or other. The responses are summarised in Table 8.

* Due to rounding these percentages in this table do not add up to 100

Table 8 - How far in advance should information be entered onto the service*

Annex	Number of responses	Any time before	At least 1 day before	At least 3 days before	Other
A - Hazardous and non-hazardous waste	651	71%	11%	8%	10%
B- Green list waste exports	581	60%	12%	17%	12%
C - Green list waste imports	578	60%	12%	17%	12%

If respondents chose 'other' for any of the options, they were asked to provide further details. 111 respondents provided further details. Of these responses the most suggested options were that information should be entered on the day of loading, or any time up to the point of loading.

Question 31: Who should be responsible for entering the information listed under Step 1 in Annex A in advance of the movement of hazardous or non-hazardous waste?

Respondents were asked to choose one or more options from the following - waste producer, waste carrier, waste broker or dealer, any of the above, or other. If they chose 'other' they were asked to provide further details.

There were 661 responses to this question. Of those, 39% chose waste producer, 29% chose waste carrier, 15% chose waste broker or dealer, 24% chose any of the above, and 6% chose other.

70 respondents provided further details. Some of these respondents stated that it should be flexible, all should be involved. Others thought it should be able to be either the producer or the broker, or the producer or the carrier.

Question 32: Within what time frame should waste carriers enter the information as required in Step 2 Annex A and Step 4 for Annex B?

Respondents were asked to choose an answer from the following for Annexes A and B: 24 hours, 48 hours, 3 working days, 1 week, or other. The responses are summarised in Table 9.

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Table 9 - Within what time frame should waste carriers enter information

Annex	Number of responses	24 hours	48 hours	3 working days	1 week	Other
A – hazardous and non-hazardous waste	643	39%	14%	20%	14%	13%
B – Green list waste exports	584	31%	17%	21%	16%	15%

If they chose ‘other’ they were asked to provide further details. 109 respondents provided further details. There were a variety of suggestions with no clear theme. These included: live at time of collection, within one month, and any time before it’s moved.

Question 33: Do you think there should be any difference in the requirements depending on whether hazardous or non-hazardous waste is being handled?

Respondents were asked to choose yes, no, or no opinion. If they chose ‘yes’ they were asked to provide further details.

There were 668 responses to this question. Of those, 24% chose yes, 57% chose no and 20% chose no opinion*.

149 respondents provided further details. A key theme from those responses was that hazardous waste should have more stringent requirements than non-hazardous waste.

Question 34: Waste receiving sites - Within what time frame should waste receiving sites be required to provide the information about (a) the waste received at their sites, (b) the disposal, recovery, preparation for re-use or treatment of waste, including information about any end of waste products or materials produced from it?

Respondents were asked to choose an answer from the following for (a) and (b): 24 hours; 48 hours; 3 working days; 1 week; other; or, no opinion. The responses are summarised in Table 10.

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Table 10 - Within what timeframe should waste receiving sites enter information

Scenario	Number of responses	24 hours	48 hours	3 working days	1 week	Other	No opinion
(a) waste received*	660	25%	14%	15%	23%	9%	15%
(b) disposal, recovery, preparation for re-use or treatment	655	10%	9%	17%	32%	14%	18%

If they chose 'other' they were asked to provide further details. 113 respondents provided further details. Of those responses, the most suggested time frames were one month, quarterly, or that it should be dependent on the waste type or process.

Question 35: Season tickets - Do you have any comments to make about this proposal or how you would like to see these movements incorporated in the waste tracking service?

Respondents were asked to choose yes or no. If they chose 'yes' they were asked to provide further details.

There were 654 responses to this question. Of those, 36% chose yes and 64% chose no.

226 respondents provided further details. Of these responses there was support for both a requirement to upload or log an agreement signed and agreed by both parties which is updated annually, and the ability to clone a previous waste tracking service record and update the date and time details. However, support was stronger for the annual agreement option. Several responses suggested having the option of both.

Question 36: Do you agree or disagree with the proposed requirements for each of the roles in Table 3?

Respondents were asked to choose agree, disagree, or no opinion for each of the following requirements: requirements common to all, requirements common to waste producers, carrier, brokers and dealers, requirements applicable to waste producers only, requirements applicable to waste carriers only, requirements applicable to waste carriers or brokers only, and requirements applicable to operators of waste receiving sites only. The responses are summarised in Table 11.

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Table 11 - Requirements by role

Requirements by role	Number of responses	Agree	Disagree	No Opinion
Common to all	657	81%	8%	11%
Common to waste producers, carriers, brokers and dealers	646	80%	7%	13%
Applicable to waste producers only	641	73%	10%	17%
Applicable to waste carriers only	643	75%	8%	17%
Applicable to waste carriers or brokers only*	638	74%	8%	19%
Applicable to operators of waste receiving sites only	646	74%	6%	20%

If they chose 'disagree' they were asked to tell us why. 122 respondents provided further information. The most raised concern in those responses was the competence of producers to be able to classify waste.

Question 37: How should waste producers be required to 'confirm' the information recorded for their waste movements?

Respondents were asked to choose an answer from the following: option 1 – within the tracking service, option 2 – through an emailed summary, option 3 – by exception, another way, or no opinion. If respondents chose 'another way' they were asked to provide further details.

There were 664 responses to this question. Of those, 64% chose within the tracking service, 7% chose through an emailed summary, 9% chose by exception, 8% chose another way, and 13% chose no opinion[†].

79 respondents provided further details. The most stated response was that respondents would be likely to use a mixture of the options.

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Question 38: Do you agree or disagree with the general principles as set out regarding digitally excluded individuals subject to waste tracking requirements?

Respondents were asked to choose agree, disagree, or no opinion. If they chose 'disagree' we asked them to tell us why.

There were 664 responses to this question. Of those, 65% agreed, 12% disagreed, and 23% chose no opinion.

94 respondents provided further details. Of these responses the key theme was that there should not be any exceptions.

Question 39: Do you agree or disagree with the proposed alternative methods for digitally excluded individuals to provide the required information?

Respondents were asked to choose agree, disagree, or no opinion. If they chose 'disagree' we asked them to tell us why.

There were 663 responses to this question. Of those, 61% agreed, 11% disagreed, and 28% chose no opinion.

86 respondents provided further details. Of these, the most prominent concern was the use of post as an alternative method of submitting information, and there were a number of responses stating that there should be no alternative system at all.

Question 40: How long should digitally excluded users be given to provide the information required via the postal service element of these provisions? For example, updated waste movement information or details of waste treatment or production of materials from waste.

Respondents were asked to choose an answer from the following: 7 days, 14 days, 1 month, other, or no opinion. If respondents chose 'other' they were asked to provide further details.

There were 664 responses to this question. Of those, 28% chose 7 days, 21% chose 14 days, 11% chose 1 month, 11% chose other, and 29% chose no opinion.

80 respondents provided further details. They were a range of suggestions ranging from instantly to annually, but there was not one particular time period suggested by the majority of these respondents.

Question 41: Do you agree or disagree with the proposed level of access to information for each of the different types of users as set out in Table 4?

Respondents were asked to agree, disagree, or choose no opinion for the proposal level of access for the following types of users: relevant government officers and environmental regulators, tax authorities, waste scheme administrators, local authorities, businesses involved in waste movements, producers and carriers, waste receiving sites, household

waste producers, and wider public and interested parties. The responses are summarised in Table 12.

If respondents chose 'disagree' they were asked to tell us why. 120 respondents provided further details. The most frequently stated reason for disagreement with the proposed level of access was concern about commercial confidentiality. Wider public access and level of access for local authorities were also raised as concerns.

Table 12 - Level of access to information by user type *

User	Number of responses	Agree	Disagree	No opinion
Relevant government officers and environmental regulators	657	82%	3%	15%
Tax authorities	651	70%	6%	24%
Waste scheme administrators	653	79%	3%	18%
Local authorities	652	76%	6%	17%
Businesses involved in waste movements	650	80%	4%	16%
Producers and carriers	650	80%	5%	16%
Waste receiving sites	650	82%	3%	15%
Household waste producers	645	71%	5%	24%
Wider public and interested parties	649	64%	10%	27%

Question 42: Do you agree or disagree that waste producers should be able to see information about the end fate of their waste?

Respondents were asked to agree, disagree or choose no opinion. If respondents chose 'agree' they were asked to provide details of what they think this should include. If they chose 'disagree' we asked them to tell us why.

* Due to rounding not all percentages add up to 100

There were 669 responses to this question. Of those, 73% agreed, 6% disagreed, and 21% chose no opinion.

323 respondents who agreed provided further details. Of these, key themes were agreement that producers should be able to see information about the type of end fate (recycling, landfilled etcetera), and that they should be able to see the location of the end fate of their waste.

41 respondents who disagreed provided further details. In these responses a key concern was commercial sensitivity.

Question 43: Do you agree or disagree with our proposals on UK GDPR?

Respondents were asked to agree, disagree, or choose no opinion. If respondents chose 'disagree' we asked them to tell us why.

There were 661 responses to this question. Of those, 77% agreed, 4% disagreed, and 18% chose no opinion*.

37 respondents provided further details. There were no clear themes from these responses, but they included concern about commercial confidentiality and that multiple controllers could undermine GDPR.

Question 44: Do you agree or disagree with our proposals on managing sensitive information?

Respondents were asked to agree, disagree, or choose no opinion. If respondents chose 'disagree' we asked them to tell us why.

There were 660 responses to this question. Of those, 78% agreed, 5% disagreed and 17% chose no opinion.

48 respondents provided further details. There were no clear themes from these responses, but they included concerns around medicines and drugs, the need for clear definitions, and suggestions that there should be full transparency.

Question 45: Do you have any comments about our proposals (or your needs) for data retention?

Respondents were asked to choose yes or no. If respondents chose 'yes' we asked them to provide further details.

There were 657 responses to this question. Of those, 20% chose yes and 80% chose no.

* Due to rounding these percentages do not add up to 100.

73 respondents provided further details. No clear themes emerged from these responses. Comments included concerns around security risks, and suggestions that data should not be deleted when permits are cancelled or surrendered.

Question 46: Do you agree or disagree with the proposed offences and associated enforcement options as set out in Table 5?

Respondents were asked to agree, disagree, or choose no opinion. If respondents chose 'disagree' we asked them to tell us why.

There were 670 responses to this question. Of those, 70% agreed, 13% disagreed, and 16% chose no opinion*.

108 respondents provided further details. Comments included suggestions that education should be the first option, that failure to register should be a variable monetary penalty, and that any enforcement should be proportionate to impact.

Question 47: Do you think there should be a maximum limit for variable monetary penalties set out in legislation?

Respondents were asked to choose yes, no, or no opinion. If respondents chose 'yes' we asked them to provide details of what they think the limit should be.

There were 661 responses to this question. Of those, 26% chose yes, 45% chose no, and 29% chose no opinion.

106 respondents provided further details. An often-suggested option in these responses was that penalties should be proportionate to impact. Other suggestions included penalties being a percentage of turnover, that it should be a flat fee of £1000, that there should be no limit, or that it should be proportionate to business size.

Question 48: Do you agree or disagree with our proposed functions for environmental regulators?

Respondents were asked to agree, disagree, or choose no opinion. If respondents chose 'disagree' we asked them to tell us why.

There were 665 responses to this question. Of those, 77% agreed, 7% disagreed, and 16% chose no opinion.

62 respondents provided further details. The responses to this question were either opposed to the proposals in general or did not include anything specific about the proposed functions.

* Due to rounding these percentages do not add up to 100.

Question 49: Do you think costs relating to the investigation of and enforcement action taken against those not complying with the requirements of waste tracking should be recoverable through the fees and charges for users of the waste tracking service?

Respondents were asked to choose yes, no, or no opinion. There was a free text box for respondents to provide more information to support their answer if they wished.

There were 667 responses to this question. Of those, 39% chose yes, 47% chose no, and 14% chose no opinion.

257 respondents provided further details. The key theme from these responses was the opinion that non-compliant users or offenders should pay, not those who are compliant. There were also a number of responses suggesting that it should be funded by government.

Question 50: What is your preferred option for who should pay the IT service operation and maintenance costs?

Respondents were asked to choose an answer from the following:

- option A – the persons or business who enters the preliminary waste tracking information
- option B – a specific user group
- option C – existing waste related fee payers
- other
- no opinion

There were 662 responses to this question. Of those, 33% chose option A, 11% chose option B, 26% chose option C, 11% chose other, and 18% chose no opinion*.

If respondents chose 'option B' (a specific user group), we asked them to tell us what user group(s) this should be. 107 respondents provided further details. In these responses to most suggested group was all users, followed by producers and waste carriers.

If respondents chose 'other' we asked them to provide further details. 68 respondents provided further details. In these responses the most suggested option was that it should be funded by government, followed by all users.

* Due to rounding these percentages do not add up to 100

Question 51: What is your preferred option for what type of cost it should be?

Respondents were asked to choose an answer from the following:

- option 1 – a per record fee
- option 2 – a flat annual fee
- option 3 – an increase to existing fees
- other
- no opinion

There were 662 responses to this question. Of those, 33% chose option 1, 31% chose option 2, 10% chose option 3, 12% chose other, and 15% chose no opinion*.

If respondents chose 'other' we asked them to provide further details. 102 respondents provided further details. Suggestions included a combination of options 1 and 2, bands or ranges based on business size, and that there should be no fee.

Question 52: What is your preferred option for how the costs should be collected?

Respondents were asked to choose an answer from the following:

- option X – on-submission payment facility
- option Y – credit system
- option Z – environmental regulators recover service costs through existing fees and charges
- other
- no opinion

There were 659 responses to this question. Of those, 17% chose option X, 21% chose option Y, 31% chose option Z, 7% chose other, and 24% chose no opinion†.

If respondents chose 'other' we asked them to provide further details. 55 respondents provided further details. Suggestions included a periodic charge in arrears, a combination of options X and Y, and not having a fee at all.

* Due to rounding these percentages do not add up to 100.

† Due to rounding these percentages do not add up to 100

Question 53: Which approach to getting all users onto the waste tracking service do you think we should adopt?

Respondents were asked to choose an answer from the following:

- option 1 – everyone must use the service from the day it goes live
- option 2 – voluntary use for a specified length of time, then mandatory for all
- option 3 – mandating some waste holders use the service or certain types of waste movement must be recorded on the service first, then on-boarding others over time
- something else
- no opinion

There were 670 responses to this question. Of those, 21% chose option 1, 48% chose option 2, 19% chose option 3, 5% chose something else, and 7% chose no opinion.

If respondents chose 'option 3' we asked which users or waste types they think should come first and why. 104 respondents provided further details. The key theme in these responses was that hazardous waste should be introduced first.

If respondents chose 'something else' we asked them to provide further details. 35 respondents provided further details. As well as general opposition to the proposals, suggestions included a mixture of options 2 and 3, and that hazardous waste should be introduced first.

Question 54: Considering your answer to question 24 in the 'Ways to enter information' section, how much do you think it will cost your organisation to transition to this way of working?

Respondents were asked to provide a figure for each of the following costs, and details of any others they foresee incurring as part of the transition to digital waste tracking: staff training, familiarisation time, requirements familiarisation, customer engagement, changes to current IT systems, provision of any on-site technology, and other. We asked that they provide costs in pounds for the first year only and only include new additional costs associated specifically with the waste service.

There were 425 responses to this question. The key themes from these responses were that more details were needed before respondents could comment on costs, or that they didn't know. Where figures were given they ranged from 'minimal' to over £100,000.

Question 55: Do you think your organisation would make any savings by transitioning to this way of working?

Respondents were asked to provide a figure for each of the following potential savings and details of any others they foresee as part of the transition to digital waste tracking, in pounds for the first year only: data storage costs, time spend checking data quality, not having to complete or submit waste returns, time spent obtaining or providing waste information from or to customers, or other.

There were 417 responses to this question. From these the key theme was that respondents thought there would be no savings. Suggestions from those who thought there would be included time savings, savings from not submitting waste returns, and monetary values ranging from £100 to £40,000.

Question 56: Alongside this consultation we have published an impact assessment setting out the costs and benefits we foresee from the introduction of a mandatory digital waste tracking service, based on assumptions made from the evidence currently available. Have we made any assumptions that you disagree with?

Respondents were asked to choose yes, no, or no opinion. If respondents chose 'yes' we asked why and, if possible, for them to provide details of better information we could use to inform our assumptions.

There were 640 responses to this question. Of those, 13% chose yes, 29% chose no, and 58% chose no opinion.

100 respondents provided further details. There were no key themes from these responses, but comments included that the service would not reduce costs, and that it would not meet the waste crime intent as it won't tackle fly-tipping.

Next Steps

We will give careful consideration to all the consultation responses and will take them into account when developing the mandatory digital waste tracking service. The themes identified from the responses, as well as ongoing user research and engagement with stakeholders, will be used to inform the drafting of the government response which we aim to publish in 2023. We are grateful to all respondents for participating.

Annex A - List of Responding Organisations

This is a list of organisations who responded to the consultation. This list does not include those that asked for their response to be kept confidential.

This list of responding organisations is not exhaustive but is based on the details provided in consultation responses. The list may include responses from individuals who are members of specific organisations and so may not necessarily reflect that organisation's views.

- 360 Environmental Ltd
- A V Transport
- A&O Van Services
- AA Limited
- AATF Forum
- ABC House Clearance (Lincoln)
- Aberdeen City Council
- Aberdeenshire Council
- ADG Auctions
- Advanced Demolition Ltd
- AEM Ltd
- Agriwork5
- Air Products Group Ltd
- AJ & RG Barber Ltd
- all4woman hygiene Ltd
- All Round Services
- AlphaCycle Limited
- Alpheus Environmental Ltd
- Althorne Gardening & Maintenance
- The Anaerobic Digestion and Bioresources Association
- Anglian Water Services Ltd
- AP-Concept UK Ltd
- Armagh City, Banbridge & Craigavon Borough Council
- ASH Group/ASH Waste Services
- Aubrey Hawkins Ltd
- Avilon Property Management
- Baco Compak (Norfolk) Ltd
- Basildon Borough Council
- Beacons Business Interiors
- Belvoir Farm Drinks Ltd
- Biffa Waste Services
- Big Atom Limited
- Biogas Meden Ltd
- Binder Ltd
- Binn Group
- Black Country Asbestos Contracts Limited
- Blaenau Gwent County Borough Council
- Boswell Bros (Salisbury) Ltd
- Bowmer & Kirkland Ltd
- Bourne Electrical Contractors Ltd

- Boyd Group (Scotland) Ltd
- BPR Group Europe Ltd
- BRE – Building Research Establishment
- Brett Group companies: Brett Concrete Ltd, Capital Concrete Ltd, Brett Landscape Ltd, Robert Brett & Sons Ltd and Brett Aggregates Ltd
- British Glass
- British Home Enhancement Trade Association
- British Metals Recycling Association
- British Sugar plc
- Broxbourne Borough Council
- BSW Timber
- BTE Services Ltd
- Buckinghamshire Council
- C N Glass Ltd
- Cadent Gas
- Caerphilly County Borough Council
- Calibre Climate Control Ltd
- Calmak Ltd
- Cambridge Electrical Wholesale Ltd
- Canal and River Trust
- Castle Environmental
- Cardiff and Vale University Health Board
- Catercraft Supplies & Heatcraft Ltd
- Cavaghan and Gray Limited
- Central Construction Services Ltd
- Centrica Business Solutions (UK) Ltd
- The Charity Retail Association
- CHC Waste Facilities Management Ltd
- Cheshire East Council
- Cheshire West and Chester Council
- Chest Heart & Stroke Scotland
- Chloros Environmental Ltd
- City Building (Glasgow) LLP
- CIWM
- CJSB Ltd T/A Rainbow International
- Clarkson Evans Ltd
- Cleansing Service Group Ltd
- Clearspace Stripout Services
- Clews Recycling Ltd
- Closing the Loop – Amsterdam (NL)
- Cohart Asbestos Disposal Commercial Waste Connections
- Completely Clear Limited
- Comprehensive Asbestos Removal Ltd
- Conoco Phillips (UK) Teesside Operator Limited
- Cornelius Specialities Ltd
- Crew Chart Ship Management AB
- Cumbria County Council
- Cumbria Recycling Limited
- Curtis and Carder Services Ltd CWM Environmental Limited
- Cynon Valley Waste Disposal Ltd T/A Amgen Cymru
- D. Harrison (UK) Limited
- Dams Furniture Ltd

- Darryl Does It
- Dartford Borough Council, on behalf of Environment Enforcement Team
- David Lucias Removals Ltd
- Day Group Ltd
- Days Window & Door Services Ltd
- Derby City Council
- Devon Authorities Strategic Committee (DASWC) – East Devon District Council, Exeter City Council, Mid Devon District Council, North Devon District Council, South Hams District Council, Teignbridge District Council, Torridge District Council, West Devon Borough Council, Devon County Council and Torbay Council.
- DJHravcon Ltd
- Doncaster Metropolitan Borough Council
- Dorset Council
- Dorset Highways
- DPS Waste Clearance
- DSM Demolition Ltd
- Dsposal Ltd
- Duchess Roofing Specialists
- Dundee City Council
- Dyer & Butler Ltd
- E J Taylor & Sons Ltd
- ECS Limited t/a Lancashire Shredding
- Ecosurety
- EDF Energy Nuclear Generation Limited (EDF ENGL Ltd)
- Effective Consumable Solutions (UK) Ltd
- Electrical Waste Recycling Limited
- Elleteq Limited
- Energy Networks Association (ENA)
- Enva Ltd
- Environmental Health Services, Leeds City Council
- Environmental Solutions Waste Management Ltd
- EnviroWales Ltd
- Etex Building Performance Limited
- Evans Vanodine International
- Evergreen Horticultural Services
- Farm and Garden Ltd
- Farmers' Union of Wales (FUW)
- Farncombe Smith 1990 Limited
- Fidra
- File Centre Document & Data Storage Ltd
- Fire & Safety Solutions Ltd
- Fire Door Specialists Ltd
- Fire Wizard Fire Safety
- ForwardSpread Limited G Easton & Son Ltd
- Gamble Plant (Norfolk) Ltd
- Garden and Fence Ltd
- The Gas Company UK Ltd
- GBN Services Ltd
- Gemini Fire Consultants Ltd
- George Morrison ELP Ltd
- Gil-Don Construction Services
- Glasgow Caledonian University

- GreenDex
- Greenergy Biofuels
- Greenyard Frozen UK
- Green Meadow Ltd T/A Acorn Recyclers
- Green Spark Environmental
- Gordon's Man and Van Service
- Guildford Borough Council
- H W Martin Waste Limited
- Hampshire County Council
- Harro Limited
- Hazrem Environmental Ltd
- Heritage Railway Association
- The Hertfordshire Waste Partnership
- Hills Quarry Products Ltd Horizon
- Hornett Bros & Co Ltd
- HT Waste Recycling T/A Budget Skips
- ICEC-MCM – The UKRI Interdisciplinary Circular Economy Centre for Mineral-based Construction Materials
- ICER (Industry Council for Electronic Equipment Recycling)
- Indaver UK Ltd
- Indigo Environmental Ltd
- Indivior UK Ltd Institution of Civil Engineers Wales Cymru
- Industry Council for Packaging and the Environment (INCPEN)
- INEOS O&P UK
- IntelliDigest Ltd
- Irons Brothers Ltd
- J Aston Transport Ltd
- J O'Shea & Sons Ltd
- J Tomlinson Ltd
- J&J Security & Electrical Ltd
- Jack Moody Recycling
- James Cropper PLC
- John Kelly Construction Services Limited
- John Lawrie Metals Limited
- John Sisk and Son
- Joint Waste Solutions
- Junk Bunk Ltd
- K&S Pipe Contractors LLP
- Keep Northern Ireland Beautiful
- Kennedy's of Gosforth
- Kent County Council
- Kent Re Users
- Kindeva Drug Delivery Ltd
- Knauf (UK) GmbH
- Lakeside EFW Ltd
- LARAC Ltd
- Law Society of Scotland
- LC Hughes Partnership
- LDB Consulting
- Lee's Waste Solutions
- Leicestershire County Council
- Liberty Speciality Steel

- Lignasite Ltd
- Lilly Clean Limited
- Lime Track Limited
- Linbrooke Services Ltd
- Lincolnshire Waste Partnership
- Lisburn & Castlereagh City Council
- Living Gardens Landscapes Limited
- Llandysilio Community Council
- London Underground Limited
- MAC Group Ltd
- MAC Surfacing Ltd
- Magnox
- Manchester and Cheshire Construction
- Mark's Lawn Service
- Marlowe Fire & Security
- Material Change Composting Limited
- Mayglothing
- McQuillan Envirocare Ltd
- Medway Council
- Mersey Waste (NW) Ltd
- Merseyside Recycling and Waste Authority
- MGH Waste
- Mid Ulster District Council
- Midland Filtration Ltd
- Millers Vanguard Ltd
- The Mineral Products Association (MPA)
- Mitre Construction Co Ltd
- Mivan Ltd
- MKRA Utilities
- MRF Supply Chain Ltd
- Multiplex Construction Europe
- The National Farmers Union (NFU)
- National Grid Gas
- National Resource Consortium Limited
- Network Rail Infrastructure Limited
- Newcastle University
- Newport City Council
- Newport Recycling Limited
- NFU Scotland
- NHS Grampian
- NHS Greater Glasgow & Clyde
- NHS Highland
- NHS Lanarkshire
- Nordex UK
- North Norfolk DC
- Northamptonshire Minerals and Waste Planning Service
- The Nottingham Zinc Group
- Nottinghamshire Healthcare NHS Foundation Trust
- Nuclear Transport Solutions
- Oatley Resources Ltd
- O'brien Recycling Ltd
- OddJobs

- Offsite Archive and Integrated Storage Solutions (UK) Ltd
- Omega Proteins Ltd
- Ottervale Haulage Ltd
- OVS Waste Management LTD
- Oxford Aerials Ltd P H Hull & Sons
- Oxfordshire Resources and Waste Partnership
- Pa Handyman Services
- Parkhill Farm Supplies
- Pathways of Scarborough Ltd
- PDG Design Construct
- Pentyrch RFC Ltd
- Pirtek Cambridge Ltd
- Plaswire Ltd
- PM Garden Services
- Polytag Limited
- Portway Plant
- Priestgate Garden Specialists Ltd
- Pure Utility Services Ltd
- Quehenberger Transport & Logistics
- The QUENSH Consultancy Limited
- R. Bunton Ltd
- R. Plevin & Sons
- R. Wilks Landscaping
- Ray Pillinger Alloys Ltd
- Recycle NI
- Recycling Lives Ltd
- Recycling UK Limited
- Redwood Materials
- Regen Holdings Limited
- Re-gen Waste Ltd
- Regency Recycle Limited
- ReLondon
- Rentokil Initial UK Ltd T/A Initial Medical Services
- REPIC
- Resource and Fuels Ireland Ltd
- Rexel UK Ltd
- Rhino Waste Services Ltd
- Rio ESG Ltd
- Road Haulage Association
- Rowley Consulting Limited
- Rubo – Hazardous Waste Management
- Rugby Borough Council SABIC UK Petrochemicals Ltd
- Saint-Gobain Construction Products UK Ltd
- Salvation Army Trading Company (SATCoL) Ltd
- Sam Allon Limited
- Samplas Recycling
- Savills
- The Scottish Salmon Company
- Scottish Water
- Scutum UK Ltd
- SE Controls
- SEL Group

- Sembcorp Energy UK Ltd
- Serco Ltd
- SGL Carbon
- Sheffield City Council
- Sheffield Hallam University
- Shore Recycling Ltd
- Sierra CP Engineering Ltd
- Signs Express Exeter
- Skanska UK Plc
- Skegness Town Council
- Smith Brother Stores Ltd
- South East Waste Planning Advisory Group
- South Gloucestershire Council
- South Tyne and Wear Waste Management Partnership (Gateshead, South Tyneside and Sunderland City Councils)
- South Yorkshire Waste Partnership
- Southern Wetrooms
- SR Rubbish Removals
- SRMA (Scotland) Ltd
- Star CWS Ltd
- Stenner Waste Transport Ltd
- Stephenson Group Ltd
- Stericycle (SRCL Ltd & Shred-it Ltd)
- Stobart Energy Ltd
- Stork Technical Services Ltd
- Street Jesus
- Suez Recycling and Recovery (UK) Limited
- Suffolk Waste Partnership (Babergh and Mid Suffolk District Councils, West Suffolk District Council, East Suffolk District Council, Ipswich Borough Council and Suffolk County Council)
- Swale Borough Council
- Swallow Hygiene
- Talisman Plastics
- Talisman Plastics
- Target Pest Control & Hygiene Ltd
- Tarmac Trading Limited
- Thistle Loos Ltd
- Thomas Sinden Limited
- Thomas Symons
- Thompson Recycling Ltd
- Timm Cann Ltd
- TKL Skip Hire Limited
- Tradebe Fawley Ltd
- Trashman Clearance Ltd
- Tyre Recovery Association
- UK Remediation Ltd
- Uniper UK Limited
- United Kingdom Lubricants Association
- United Resource Operators Consortium Limited (UROC)
- United Utilities
- University of Exeter
- Unyte Waste Limited

- Valero Energy Ltd
- Valpak
- Vehicle Recyclers' Association
- Viabl Ltd T/A Able Group
- Viridor
- Vistry Group
- Waltet Materials Ltd
- Warkton Roofing Co Ltd
- Wastebuster CIC
- Wastecare Group Limited
- Wasted NE Ltd
- Waste Managed Ltd
- Wealden District Council
- Wealdon Services Ltd
- Wedge Group Galvanising Ltd
- WEEE Solutions Limited
- Weidmann Whiteley Ltd
- Wessex Water
- West Midlands Resource Technical Advisory Body
- West Sussex County Council
- Western Power Distribution Ltd
- The Wetroom Ltd
- W H Malcolm Limited
- Wildlife and Countryside Link
- William Munro Construction (Highland) Ltd
- William Nicol (Aberdeen) Limited
- William Thompson & Son (Dumbarton) Ltd
- Wiltshire Council
- Winvic Construction Ltd
- WJFJ Ltd
- WMG
- Wolverhampton Homes
- Womble Services Ltd
- Wood Recyclability
- The Woodhorn Group Ltd
- WPIF Environmental Ltd
- WPS Compliance Consulting Ltd WPSCC
- Yaskawa Electric UK Ltd
- Yorkshire Builders Ltd
- Yorkshire Water Services Limited